

11th July 2005

Ms. Noeleen Roche Office of Licensing & Guidance **Environmental Protection Agency** Headquarters, P.O. Box 3000 Johnstown Castle Estate Co. Wexford

Rennard Pig Farms Ltd.

Licence Review Application Reg. No. The Deep/Cornwall, Crossabeg, Co. Wexfor

Dear Ms. Roche.

Re:

I refer to the above application for a licence review which was referred to Fáilte Ireland under Article 20(1) of the Environmental Protection Agency (Licensing) Regulations 1994 to 2004.

Fáilte Ireland is, in general, supportive of the development of anaerobic digesters as they are a sustainable method of dealing with on farm waste and can bring with them a range of environmental benefits. However, the action of an anaerobic digester is an organic process and, therefore, must be carefully managed and properly supervised. A comprehensive management and maintenance plan should accompany this application which should, inter alia, provide details of the human resources that will be allocated to ensure the effective, efficient and safe operation of the digester. The effectiveness and efficiency of the process is also dependent on the mix of organic material that is inputted to the digester. Guarantees must, therefore, be secured to ensure that the nonslurry material can be sourced on a consistent basis from approved sources and a contingency plan in this regard must also be put in place. The application should also demonstrate that alternatives to the use of Belly Grass have been explored.

The primary concern of Fáilte Ireland in relation to this proposal is the potential threat to water quality in the River Slaney which is a proposed candidate Special Area of Conservation (pcSAC) and a popular fishing area, as well as to the groundwater of the area, which are at risk from accidental spillages of slurry or digestate material that may occur on site or while being transported to or from the site.

Yours sincerely,

Donal Guilfoyle

Head of Regional Development.

ุอม สมคร