

Crossabeg / Killurin Community Action Group

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Reg. No. 742

13.03.06

Proposed erection of an Anaerobic Digester on the banks of the River Slaney.

Dear Madame,

I refer to your letter of 16th February, and have pleasure in completing our submission which is based on the objections raised by Reenard farms.

Condition 2.1.3

By removing this condition, Reenard could be considered as removing their responsibilities for a 'cradle to grave' approach in relation to the management of application of wastes from their facility to the receiving land bank. It would be considered more appropriate that Nutrient Management Plans be held at the site of the proposed development which demonstrates load by load where the waste material was and is planned to be landspread. This NMP should not only identify the farm by the individual plots of land on a daily and weekly basis where the material was landspread.

Condition 3.5

We understand the difficulty presented by the provision of safe and permanent access to the Agency for off-site locations. However, the Agency is responsible for ensuring that the wastes generated from the proposed development are applied to land in an environmentally sustainable manner. The responsibility of the licensee and the Agency should not stop at the front door of the facility. The Agency needs to be able to satisfy itself that the land spreading of the wastes from this proposed IPC licensed facility are conducted in a manner which does not pollute the environment. Please refer to the proposals we made in connection with on site monitoring in our previous objections

Condition 3.6.5. and 3.6.7

In the event of a leak detection system, which is assessed for adequacy by the Agency, being provided under floors of specific structures, and it is agreed to remove the requirement for 3 or 5 year integrity assessments, the leak detection system in itself as a reasonable alternative should be required to be fully tested and reported on a 3-5 yearly basis.

Condition 4

These conditions are necessary to ensure that the activity is conducted in an environmentally responsible manner with the required full traceability. The Agency should ensure that if modifications are made to these conditions it should not be to the



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extent that the traceability for the waste is transferred from the licensee to farmers who landspread the waste but a combination of both.

Condition No. 11.10

The Agency and licensee's responsibility is to ensure that waste materials generated from the IPPC licensable activity are handled in a manner which does not result in environmental pollution. This will as a consequence require customer farmers to apply the wastes to their land in a fully transparent and traceable manner which can be verified by the Agency.

Schedule A

We would request that the Agency fully assess the implications of changing the schedule from maiden gilts back to gilts vis a vis waste generation and environmental impact.

Schedule C.6.2 and C.7.1

We strongly disagree with the removal of this requirement as it in essence defines the suitability for the receiving lands to accept the waste. If there is no assessment of the adequacy of the receiving land bank, how can the Agency be sure that the land application of the waste will not result in environmental pollution?

Schedule D, Conditions 11.10(iii), 11.10(v), 11.10 (vi)-(xi)

We strongly disagree with this request from the proposed licensee. There should be full traceability. If the information is commercially sensitive surely a coding system agreed between the licensee and the Agency can be developed. We cannot accept any lack of transparency in the land spreading activity.

In addition we are very worried that the proposed licensee appears to be endeavouring to avoid the nutrient management plan, adequate storage, traceability and responsible land spreading requirements by hiding behind farmers increased responsibilities in relation to the Nitrates Regulations.

In fact if one closely reviewed Section 34 of the Nitrates Regulations, one should note the requirement on the Agency to;

Transitional provisions relating to licensed activities

34. (1) The Agency shall as soon as may be after the making of these Regulations and not later than 30 October 2007, review or examine, where necessary, any licence granted by it under Part IV of the Act of 1992 and shall determine the review or amend the licence on the basis of giving effect to the standards prescribed by these Regulations in relation to the amounts of nitrogen and phosphorus which may be applied to land.



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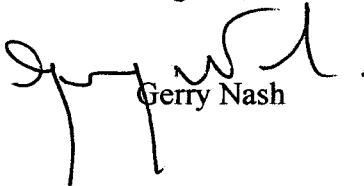
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This in essence requires the Agency to ensure effective nutrient and wastes management vis a vis setting limits for nitrogen and phosphorous which can be applied to lands taking waste from an IPPC licensable activity.

We look forward to receiving an opportunity to comment further on the issues raised by Reenard Farms to our objections.

Killurin and Ferrycarrig Rowing Clubs concur with the views expressed above.

Regards,


Gerry Nash


Dr. John Morris


Michael O Leary

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