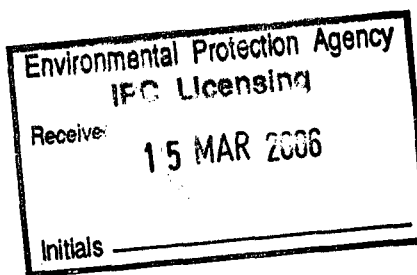


Office of Licensing & Guidelines,
EPA Headquarters,
P.O.Box 3000
Johnstown Castle, Co. Wexford



13/03/06

**Comments in Respect to Objections by M.S. Farm Services to the
Proposed Determination for a Review Integrated Pollution
Prevention and Control Licence by Rennard Farms Ltd. at
Killurin Co. Wexford (Licence Register No. 742)**

(a)

Point (2) Monitoring only on the site (Red Area on site map) itself, as requested by the applicant is a further attempt to reduce costs and responsibility. The monitoring as proposed in the licence determination is totally inadequate, and fails to address our concerns as regards human health, the river and the reed beds which are Special Areas of Conservation, and adjoining lands.

Is this "State of The Art Danish Technology"? With old tanks, a hay barn in which to store fibre, an old septic system, doubts about spreading digestate on grassland, and a most sensitive site, where will the spiral of declining standards end?

(b)

Point (-3). Visual assessment of the tanks used to store Digestate beside a river and an S.A.C. and adjoining other farms is simply not acceptable. As pig farmers now know, tanks built in the eighties are easily damaged and have to be patched.

(c)

The proposed feedstuffs to be used are not all currently land-spread in Wexford, as claimed. Milk- sludge is, but what sane farmer would spread fish-waste? With the decline in fish-processing, where can Rennard Pig Farms Ltd. get the continuous supply necessary for A.D?

All the proposed feedstuffs included in the licence application put the construction and

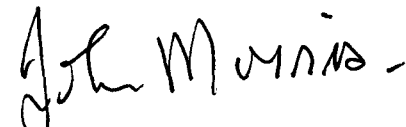
operation of this A.D. outside the remit of D.A.F., whose regulations on pasteurisation, animal disease control, site evaluation, traceability etc. are very stringent in comparison to those in the Proposed EPA licence. This places grave responsibility on the EPA to prevent a low-standard template which other A.D operators may follow.

(d)

With regards to the Nitrates Directive and tracability, the EPA must be aware of interpretation of the directives and where the responsibility rests for the protection of the environment by control of pollution.

Because the facility will be outside the remit of D.A.F., it is especially important that there should be full tracability, from source to sink, of all materials which may pollute our rivers, water supply and habitats. Otherwise the EPA has no function and becomes a waste of the tax-payer's money, and a servant of commercial interests.

We trust you will give due consideration to the above comments.


John Morris


Frances Morris

Ballyharran, Crossabeg, Co. Wexford.