

Patrick.J.Hayes

Rathcline,
The Reisk,
Killurin, Enniscorthy,
Co Wexford.
Phone 053 28956

The Environmental Protection Agency.
P.O Box 3000,
Johnstown Castle Estate,
Co Wexford.

13 March 06

Your Ref: Reg No 742. Current Licence No 453.
Rennard Pig Farms Ltd,
The Deeps, Kilpatrick,
Killurin,
Co Wexford.

Dear Sir / Madam.

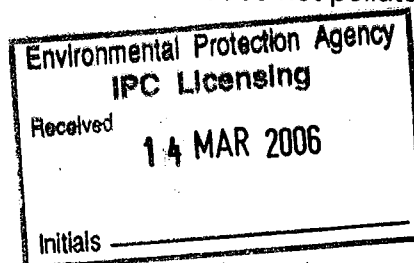
Following receipt of your letter dated 8th February 2006 which enclosed a copy of the objection to the conditions by Messrs M.S Farm Services on behalf of Messrs Rennard Pig Farms Ltd. I would like to comment and make the following submission.

Condition 2.1.2

By removing this condition Rennard 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 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 spread. This NMP should not only identify the farm by the individual plots of land on a daily and weekly basis where the material was land spread.

Condition 3.5

I understand the difficulty presented by the provision of safe and permanent access to the Agency for off-site locations. However, The Agency are 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 that the land spreading of the wastes from the IPPC Licensed facility are conducted in a manner which does not pollute the environment.



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 full traceability. The Agency should ensure that if modifications are made to these conditions it should not be to the extent that the traceability for the waste is transferred from the Licensee to farmers who land spread the waste but a combination of both.

Condition No. 11.10

The Agency and the Licensee's responsibility is to ensure that waste materials generated from the I.PPC. 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.

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

Schedule C.6.2 and C.7.1

I 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)

I strongly disagree with this request from the proposed Licensee. There should always be full traceability. If the information is commercially sensitive surely a coding system agreed between the Licensee and the Agency can be developed. Any lack of transparency in the land spreading activity is not acceptable under any circumstances.

In addition I am 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 requirements on the Agency to;

Transitional provisions relating to Licensed activities

March 14, 2006

34. (1) The Agency shall as soon as maybe after the making of these Regulations and not later than 30th 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 given effect to the standards prescribed by these regulations in relation to the amounts of nitrogen and phosphorous which may be applied to land.

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

It is very obvious that Messrs Rennard Pig farms Ltd are not prepared to take the necessary responsibility in the proper running of the proposed instillation.

To renege on the safe running of, and in the maintenance of the proposed plant and in it's upkeep. To accept no responsibility for the spreading of the wastes or the suitability of or the condition of the land bank, for example their proposal to use fish waste. This must be fully investigated. To accept no responsibility for the environment. It is very obvious that Messrs Rennard Pig farms are not suitable candidates to be granted this licence review.

Yours sincerely,



Patrick Hayes.

For inspection purposes only.
Consent of copyright owner required for any other use.

