


*Reddina  
Killurin  
Enniscorthy  
Co. Wexford*

Date: 15<sup>th</sup> March, 2006.  
Ref: MAO'L/DR

I.P.C. Licensing and Control,  
Environmental Protection Agency,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

RECEIVED	
Time	1220
16 MAR 2006	
Signature 	
Environmental Protection Agency, HQ. P.O. Box 3000, Johnstown Castle Estate, Co. Wexford.	

**Re: Rennard Pig Farms Limited – Licence No. 453**

Dear Sirs,

I refer to your letter of the 16<sup>th</sup> February and note in particular that the applicant for the licence has objected to certain conditions in the licence, and I wish to comment on these.

**Condition No. 2.1.3** - The nitrates directive certainly does place certain requirements on farmers with regard to the application rate for fertilizer on the land, but the farmer can only carry this responsibility adequately if there is a proper traceability system in place in order to trace the fertilizer back to source. I would be particularly concerned that some of the product coming from this facility may carry an element of disease risk and by having a proper traceability in place, in the event of an outbreak of a disease on a particular farm that would have used the digestate it should be possible to trace back, not alone to the applicants but to the suppliers of the raw material. I refer in particular to the belly grasses and fish waste which appear not to be covered by any legislation at the present time, in particular the two departments responsible for these activities, namely, agriculture and marine. In the event of some animal organs getting mixed up in the belly grasses and finding its way on to a farm by virtue of the fact that it has not been adequately treated in the digester as it would be only heated to a level of 58%, it does carry a substantial risk, therefore, traceability is a must.

**Condition No. 3.5** - The applicants are trying to absolve themselves from a certain element of responsibility and trying to offload this responsibility to other parties, therefore, the condition should stand.

**Condition No. 3.6.5 & 6.7** - The position on this site is that some of the storage being used in this application is very old and has been there for many years. I would have to question the condition of a lot of these tanks, and suggest that they should not be used at all – in fact they should be totally replaced by new tanks as the old tanks carry the risk of leakage and could possibly cause an environmental disaster.

**Condition No. 11.10 (ii)** - The reply to this condition in fact serves to increase the concern of local people with regard to eventual distribution of the material from this particular operation. It

get rid of a substantial amount of the material proposed to be processed at this site. This development has been applied for on the basis of an agricultural activity, while it is clearly an industrial activity, and will be producing substantial amounts of waste. I would be of the opinion that the promoters have now recognised that it is their responsibility to install substantially more storage than is proposed by the EPA in the licence and are, therefore, effectively seeking a way out by placing the onus on the receiving farmer to store the product in the event of him not being in a position to spread it on his land, or alternatively they may put themselves in a position where they can hire storage space in silage pits or slurry tanks in order to store surplus material.

It has always been the contention of the local people that the location of this facility and the amount of product to be transported in was going to create serious storage problems, particularly with nitrates policy and I would, therefore, ask that the capacity of the activity be re-looked at in the context of the objection and that the digester be reduced to an ordinary agricultural digester servicing the number of pigs in each fattening unit and that no material should be allowed in.

**Schedule A : Limitations** - No reason was given for wanting to change from gilts to maiden gilts, therefore, this should not be changed.

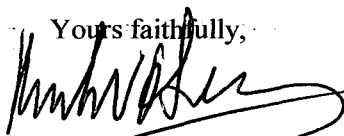
**Schedule C 6.2** - The monitoring situation should actually be strengthened rather than amended.

**Schedule D** - The names of the customers are not commercially sensitive. They should have been produced at the time of the original application and the result of the tests on the various farms should also have been produced. I would suggest an amendment to the environmental report and that all this information should be made public as this is an environmental issue and the public have a right to know what is going on in the vicinity of their homes.

**Condition 11.10 (iii)** - This condition should stand, otherwise we could end up with a situation where the organic fertilizer from the facility could be delivered to farmers, stored on the farms and eventually find its way in an unrecorded fashion on to agricultural land. The question of competition does not arise in this case as it has been made quite clear through the application that the product will be given free to pre-approved farmers.

I would propose that the conditions of this licence be strengthened in line with the conditions proposed by the objectors in the local area. These are the people who know the area, know the land and know the soils, and their concerns should be taken on board and acknowledged openly by the EPA who are charged with responsibility for protecting the environment.

Yours faithfully,



Michael O'Leary