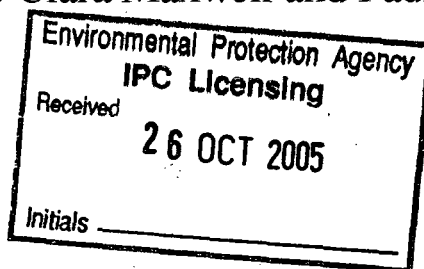


## Submission to Ciara Maxwell and Padraig Larkin.



Ballyharan,  
Crossabeg,  
Co. Wexford,  
Ireland.

28/10/2005

Ref: Licence Application No. 742

Firstly, I wish to comment on the Environmental Impact Statement (EIS) submitted on behalf of Reenard Farms, owned by John and David Ronan to the E.P.A., in pursuit of a licence to include the building of an anaerobic digester at the pig farm at the Deeps, Killurin.

It is a sub-standard document, poorly presented. It contains irrelevant data. It is in part aspirational and fails to address the issue of environmental impact.

The following are a few examples:

The site is beside the River Slaney, on variable soils, close to the water table. It is on ground sloping to the river, and is both tidal and subject to flooding. In this situation, a proper hydrological survey should have been carried out by experts. This would have involved the boring of a large number of holes; at least three holes should have been bored for groundwater alone.

Analysis of soils/sub-soils/groundrock should have taken place and the risk to groundwater should have been evaluated and quantified. In a situation where surface water run-off can be blocked by spring tides, resulting in flooding, the risk of pollution from this source should have been evaluated.

This is a high-risk location, and is subject to the EU Water Framework Directive. Thus, the limitations of the EIS are apparent.

Odour assessment is aspirational and simply ignores the risk from transport and storage of animal waste, and the possible leaks of obnoxious mercaptans, hydrogen sulphide etc. A further odour source which may arise from the storage of digestate is not even noted. The odours from piggeries can be reduced by good management.....clean houses and pigs, and proper diet and access to water. The pig slurry storage tanks should be covered.

This piggery in Killurin is famous for odours. The reason why these odours are so bad made be due to the location of the piggery in a valley, atmospheric conditions and management. In the EIS, the concept of pumping the air from the piggery high into the atmosphere by the use of fans and chimneys (6.2.5.1 a) indicates that there is a problem in a valley.

The aspiration to reduce odour emissions by 50% from their present very high non-specified baseline is unacceptable, especially to those living beside the piggery and those living downwind.

**EPA**  
MAIN FILE ☒  
PUBLIC FILE ☒  
EVALUATION FILE ☒  
DATE 26/10/05 CM

As regard noise levels, the EIS states that noise levels are unlikely to be a problem. The presence of three families within 100metres of the site is ignored. The noise which is generated by the feed-mill is not mentioned. This can be heard at night in the valley. It resonates and like a drip from a tap, is a nuisance. The building and operation of a large industrial scale anaerobic digester will add some decibels to the present noise levels and will be a problem in the valley.

The flora and fauna report is ridiculous. It lists birds, trees etc. It refers to the Sloblands, Tullow, Edermine etc. It quotes from an EPA discussion document on anaerobic digestion. It totally ignores the serious question of what the environmental impact of such a large industrial complex will be on the flora and fauna at the proposed site in Killurin, which abuts a proposed Special area of Conservation. This section could be written without visiting the site.

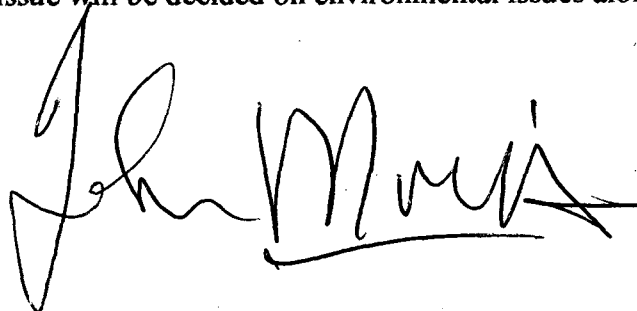
The failure of the applicants to communicate with adjoining landowners and the local community and the record of indifference to locals over a large number of years has totally alienated the residents. There is a lack of trust. Based on our house-to house calls and the response to our web-site ([www.riverslaney.org](http://www.riverslaney.org)) 98% of the local population is opposed to the proposed development at the Deeps.

Bland statements from the EIS such as "it is in a remote location"; "it will have no effect on tourism"; noise will not be a problem" diminish the E.I.S. since they are untrue.

A meeting was held recently in Enniscorthy by the I.F.A. for its members. A team of experts from N.R.G.E. outlined the benefits of anaerobic digestion, and the need to place a digester at The Deeps in Killurin. It will secure the piggery, save jobs, and benefit barley growers in Wexford. The impression given was that the impetus for anaerobic digestion comes from the E.P.A. and that it is necessary to build an anaerobic digester to secure the renewal of the licence. Since this is the B.A.T. they are confident that the E.P.A. will grant the licence. This explains why the planning submission and the E.I.S. are so poor from such experienced operators. The fact that pig farmers are in both the High and Supreme Court, was mentioned. The E.P.A. are under pressure from the pig sector.

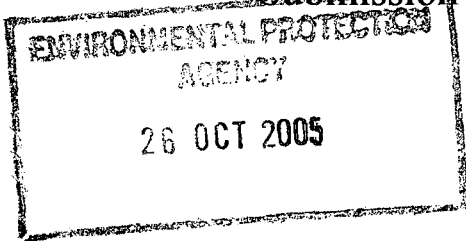
We hope that the issue will be decided on environmental issues alone.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Morris', with a stylized, sweeping flourish at the end.

JOHN MORRIS.

Submission to Ciara Maxwell and Padraig Larkin.



Ballyharraan,  
Crossabeg,  
Co. Wexford,  
Ireland.

28/10/2005

Ref: Licence Application No. 742

Firstly, I wish to comment on the Environmental Impact Statement (EIS) submitted on behalf of Reenard Farms, owned by John and David Ronan to the E.P.A., in pursuit of a licence to include the building of an anaerobic digester at the pig farm at the Deeps, Killurin.

It is a sub-standard document, poorly presented. It contains irrelevant data. It is in part aspirational and fails to address the issue of environmental impact.

The following are a few examples:

The site is beside the River Slaney, on variable soils, close to the water table. It is on ground sloping to the river, and is both tidal and subject to flooding. In this situation, a proper hydrological survey should have been carried out by experts. This would have involved the boring of a large number of holes; at least three holes should have been bored for groundwater alone.

Analysis of soils/sub-soils/groundrock should have taken place and the risk to groundwater should have been evaluated and quantified. In a situation where surface water run-off can be blocked by spring tides, resulting in flooding, the risk of pollution from this source should have been evaluated.

This is a high-risk location, and is subject to the EU Water Framework Directive. Thus, the limitations of the E.I.S. are apparent.

Odour assessment is aspirational and simply ignores the risk from transport and storage of animal waste, and the possible leaks of obnoxious mercaptans, hydrogen sulphide etc. A further odour source which may arise from the storage of digestate is not even noted. The odours from piggeries can be reduced by good management..... clean houses and pigs, and proper diet and access to water. The pig slurry storage tanks should be covered.

This piggery in Killurin is famous for odours. The reason why these odours are so bad made be due to the location of the piggery in a valley, atmospheric conditions and management.

In the EIS, the concept of pumping the air from the piggery high into the atmosphere by the use of fans and chimneys (6.2.5.1 a) indicates that there is a problem in a valley.

The aspiration to reduce odour emissions by 50% from their present very high non-specified baseline is unacceptable, especially to those living beside the piggery and those living downwind.

As regard noise levels, the EIS states that noise levels are unlikely to be a problem. The presence of three families within 100metres of the site is ignored. The noise which is generated by the feed-mill is not mentioned. This can be heard at night in the valley. It resonates and like a drip from a tap, is a nuisance. The building and operation of a large industrial scale anaerobic digester will add some decibels to the present noise levels and will be a problem in the valley.

The flora and fauna report is ridiculous. It lists birds, trees etc. It refers to the Sloblands, Tullow, Edermine etc. It quotes from an EPA discussion document on anaerobic digestion. It totally ignores the serious question of what the environmental impact of such a large industrial complex will be on the flora and fauna at the proposed site in Killurin, which abuts a proposed Special area of Conservation. This section could be written without visiting the site.

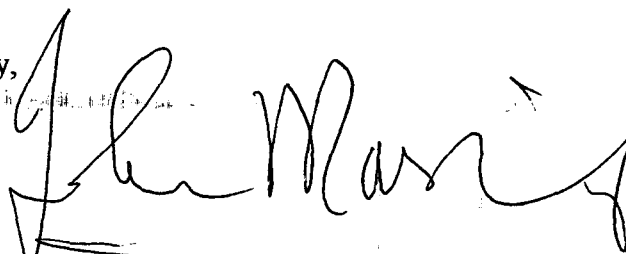
The failure of the applicants to communicate with adjoining landowners and the local community and the record of indifference to locals over a large number of years has totally alienated the residents. There is a lack of trust. Based on our house-to house calls and the response to our web-site ([www.riverslaney.org](http://www.riverslaney.org)) 98% of the local population is opposed to the proposed development at the Deeps.

Bland statements from the EIS such as "it is in a remote location"; "it will have no effect on tourism"; noise will not be a problem" diminish the E.I.S. since they are untrue.

A meeting was held recently in Enniscorthy by the I.F.A. for its members. A team of experts from N.R.G.E. outlined the benefits of anaerobic digestion, and the need to place a digester at The Deeps in Killurin. It will secure the piggery, save jobs, and benefit barley growers in Wexford. The impression given was that the impetus for anaerobic digestion comes from the E.P.A. and that it is necessary to build an anaerobic digester to secure the renewal of the licence. Since this is the B.A.T. they are confident that the E.P.A. will grant the licence. This explains why the planning submission and the E.I.S. are so poor from such experienced operators. The fact that pig farmers are in both the High and Supreme Court, was mentioned. The E.P.A. are under pressure from the pig sector.

We hope that the issue will be decided on environmental issues alone.

Yours sincerely,



JOHN MORRIS.