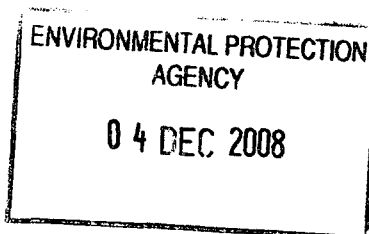




Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



SUB (4)
Environmental Health Service
Community Care Services
Co. Clinic
Navan
Co. Meath

Tel: (046) 902 1595 / 907 8811
Fax: (046) 902 2818

Ms. Marie Harris,
Office of Climate, Licensing and Resource Use,
Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

1st December 2008

Re: Reg. No.: P0822-01 - An Integrated Pollution, Prevention & Control licence applied for by Cooksgrove Ltd. T/A Euro Farm Foods at Cooksgrove, Duleek, Co. Meath.

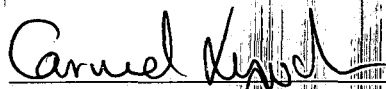
In my opinion the applicant has failed to address a number of important environmental matters in the Environmental Impact Statement. In order to properly assess this application please request applicant to submit the following further information:

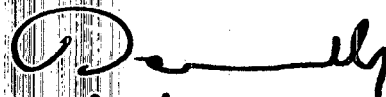
1. The EIS states that organic waste arising from the facility will be stored in a number of storage tanks on site and at a "bespoke land bank" in Rathfeigh. The calculations outlined on pages 195 and 196 of the EIS would suggest that the available storage capacity falls far short of the required 2463m³. The EIS suggests that a lagoon located in Rathfeigh may also be used for additional storage of effluent in the future. The applicant has failed to submit a plan indicating the location of these storage areas or details of their individual capacity and type of construction.

It was also noted that a large shed located in Rathfeigh is used for housing cattle. The applicant should clarify if the same storage tanks are used for storing effluent arising from these sheds.

2. There is a large area of land owned by the applicant in Rathfeigh which has been developed into a series of wetlands, the applicant states that planning permission may be sought for this development at a later stage. These wetlands have not been indicated on plan, the applicant suggests that they may be used as a tertiary treatment for effluent. Please request applicant to clarify this matter and submit further information on these wetlands.
3. The applicant states there is solid waste storage capacity available at Rathfeigh in covered yard areas. The applicant has failed to indicate these areas on plan, has failed to submit information regarding the classes and volumes of waste which may be stored in these areas and has failed to assess any of the impacts such storage may have on the surrounding environment. Such storage may give rise to an odour nuisance and may also attract pests to the area.

4. The EIS states that two on-site ground water wells are used to supply the facility. The applicant has failed to address the impact the drawdown of these wells may have on surrounding private wells. The applicant should also provide information regarding raw water quality and submit results of analysis.
5. The applicant has indicated on plan two surface water discharge points, the applicant should submit information regarding the quality of surface water which is discharged at these points.
6. The applicant has failed to submit detailed information regarding odour control. The EIS states that negative ventilation and passive odour control units will be installed on site. Please request applicant to submit further information regarding these systems.
7. The applicant suggests that the proposed "development of the dry boning hall, underground storage tanks and offices will in fact result in no additional noise emissions to those already in existence". The plans would indicate that in addition to the boning hall, a large coldroom will be constructed. The applicant has failed to submit details of the refrigeration units to service this new development. These units can be very noisy and may result in a nuisance at noise sensitive locations. The applicant should submit information regarding these units and should address the impact these units may have on the surrounding noise environment.
8. The flora and fauna section of the EIS states that there is a large population of rats surrounding the facility, it suggests that this may be as a result of the availability of carrion on the grounds of the facility. This is unacceptable practice and may give rise to a serious nuisance in the vicinity of the development. The applicant must submit a pest management plan to ensure that this nuisance is abated and does not arise again in the future. The applicant must also consider the implications of administering rat poison and the effect this may have on animals higher up the food chain.


Carmel Lynch
Environmental Health Officer

cf. 
P. Kelly
2/12/08