

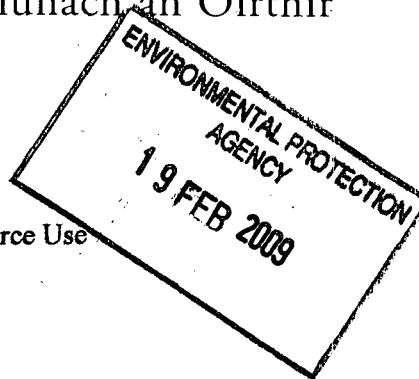


Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage



Office of Climate, Licensing & Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
County Wexford

18 February 2009

Dear Sir

Section 4 Discharge License by Ballon Meats Ltd at Raheen, Ballon, Co. Carlow

Dear Sir,

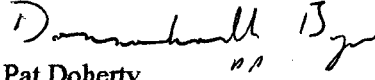
Further to our letter dated the 13th February 2009 the Board wish to make the following submission relating to the Stand-Off Pad area in use at Ballon Meats. We note that the Out-Wintering pad was constructed in 2005 prior to the Department of Agriculture Guidelines which were released in February 2007.

The Department of Agriculture and Food, Minimum Specifications for out Wintering Pads states that "underneath the drainage system the effluent is collected and stored before being recycled onto a suitable crop", Section A.4 of the DAFF minimum specifications for Out Wintering Pads states that "All the effluent produced on the OWP shall be contained and stored in an appropriate facility. The construction of the effluent storage tank shall be in accordance with the requirements of the DAFF Specifications and any other regulations or conditions. All effluent collected from the underdrainage system or off-pad feeding areas shall be considered to be slurry and shall require management as such".

An Inter-Departmental Technical Working Group was set up to consider the performance of ICWs with a view to develop technical specifications for their siting, design, construction and operation. This group has yet to report and to date no minimum specifications for ICWs have been issued by the Department of Agriculture.

The Board do not believe that the discharge from the OWP at Ballon Meats fulfills the criteria relating to storage as laid down in the DAFF Minimum Specifications for OWPs, and as no minimum specifications for ICWs have been published to date no discharge from the OWP to the ICW system should be permitted. We request that the run-off from the OWP site be directed to an appropriate storage tank for land-spreading or to the secondary waste water treatment facility (including P removal to maximum 2ppm) prior to discharge to the ICW system.

Yours faithfully


Pat Doherty
Chief Executive Officer

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