

**Submission re IPPC Licence Application Ref. No. P0942-01,  
Mr. Derek Good, Ardnaclug, Innishannon, Co. Cork.**

I refer to the above IPPC application which was referred to Cork County Council for comment.

I have the following comments to make on the application, primarily dealing with proposals for the management of poultry litter;

1. The applicant refers throughout the application to S.I 378 of 2006, it should be noted that this was superseded by S.I. 610 of 2010.
2. The applicant states that approx. 600 tonnes of poultry litter will be generated annually on site. Table 8 in S.I. 610 of 2010 states that the P content of Broiler Poultry Litter is 6 kg/T. On this basis the annual poultry litter produced on site will contain an estimated 3,600kg of P.  
However if Table 6 of S.I. 610 of 2010 is used to calculate P produced in poultry litter the estimated P produced by the 88,000 broiler places on site is 7920 kg P. Clearly there is an inconsistency between these figures which should be clarified by the applicant.
3. On pages 34 & 35 of the Application Form the applicant sets out a table which identifies the lands which will be used for recovery of this poultry litter. This table states that poultry litter contains 3.51 kg P /T.  
It is noted that Table 8 in S.I. 610 of 2010 states that the P content of Broiler Poultry Litter is 6 kg/T.  
If the figure of 6kg P/t is correct then the applicant has not identified sufficient lands to recover the poultry manure. This should be clarified by the applicant.
4. On pages 34 & 35 of the Application Form the applicant refers to Plot 52 receiving 82.26 T of poultry litter or 21.37T/ha.  
This application rate will result in an organic N loading of 235 kg N /ha from livestock manure, (11kg N /T poultry litter as per Table 8 in S.I. 610 of 2010), which is in breach of Article 20 of S.I. 610 of 2010.
5. The applicant has not demonstrated that there are facilities provided for 26 weeks storage of poultry manure in accordance with Article 10 of S.I. 610 of 2010.
6. Very little information is provided on the lands which are proposed for the recovery of poultry litter from this unit other than the table on pages 34 & 35 of the application form.

Frank O'Flynn,  
Senior Executive Scientist,  
Cork County Council,  
Environment Directorate.  
13/5/2011.