



Iascach Intíre Éireann
Inland Fisheries Ireland

Joe Reilly
Office of Climate, Licensing and Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford



15th November, 2011

Re: IPPC Licence Application Review – Silver Hill Foods
Reg: P0422-03

Dear Sir,

We refer to the application made by Silver Hill Foods for the review of an IPPC Licence for activities at Emyvale, Co. Monaghan.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource.*

Having examined the application documents we have the following observations to make:

Section D – Existing Environment and Impact of the Activity

Attachment No D.1, Table 5 depicts a theoretical situation in which the treated effluent discharges directly into the Corlattlan stream. This shows that the effluent would have the ability to cause significant deterioration in the water quality of the Corlattlan stream during low flow conditions. However the effluent does not discharge here but into another stream which drains a significantly smaller catchment and so would have a far lower flow. Therefore, the discharge would be expected to have a far greater relative impact on this stream. In our opinion, it is unacceptable that the direct effect of the discharge at emission point W1 on the actual receiving watercourse (denoted unnamed stream in the application) is not examined.

We would urge that compliance with Article 5 of EC Environmental Objectives (Surface Waters) Regs, 2009 (S.I. 272 of 2009) is ensured, which includes the following provision:

- A public authority shall not, in performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status (or ecological potential as the case may be) of a body of surface water.

We would be very concerned at the chemical characteristics of the “unnamed stream” as described in Attachment No D.1, Table 1. This figures described in this table denote a highly polluted watercourse. There is no indication as to the cause of this issue. However a large proportion of the streams catchment

is within The Silver Hill Foods site. Therefore we feel that the onus should be on Silver Hill Foods to attempt to account for the streams poor condition, to ensure that activities within the site are not a contributor.

We note that there is scant reference to slurry management within the application. Silver Hill Foods is a large operation and so must produce a large amount of slurry. If good management practise is not in place, it has the potential to be extremely detrimental to both the local environment and further afield. Therefore we feel that the management of this potential pollution source must be examined more closely prior to a licence renewal being granted.

Given the fisheries potential of the Corlattan stream and other streams in the vicinity, it is vital that appropriate discharge limits are set in this licence to protect the aquatic habitat.

We trust you will take our observations on board when assessing this application.

Yours faithfully,



William Walsh,
Director – Eastern River Basin District

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