



Iascach Intíre Éireann
Inland Fisheries Ireland

Bea Clayton
Office of Climate, Licensing and Resource use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

21st November, 2011

Re: IPPC Licence Application Review – Town of Monaghan Co-op
Reg: P0815-02

Dear Bea,

We refer to the application made by Town of Monaghan Co-op for the review of an IPPC Licence for activities at Coolshannagh, 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

Table D.5(i) Assesses the impact of both the SW2 and SW5 discharges combined during 95%ile conditions. To carry out these calculations it is mentioned in the application form that data was obtained from historical hydrometric data to provide the actual flow of the receiving water course during 95%ile conditions to calculate the impact of these discharges. It is unclear exactly how this data was obtained. However The EPA register of hydrometric stations 2007 provides a 95%ile flow of 0.05m³/s at Faulkland bridge and not 0.5m³/s, as mentioned in the application. As the actual figure provided by The EPA is a tenth of that used to examine the assimilative capacity of the receiving watercourse, the calculations provided must be deemed invalid.

One must also conclude that during 95%ile conditions (if The EPA data is still valid), the effluent discharges from the site in question would undoubtedly cause the receiving watercourse to exceed pollutant limits which would constitute good status in a water body as per SI 272 of 2009 E.C Environmental Objectives (Surface Water) Regs, 2009.

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 also like to note that we feel it is unclear how the average volume and constituents of the discharge at SW2 were arrived at. We would request that this is disclosed prior to a licence being granted.

The Blackwater River, which is a valuable salmonid river, is adjacent to the site. It is imperative to ensure that the treated effluent discharge does not have a negative impact on this valuable resource.

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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