



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

SUBMISSION NO. 3
Environmental Health Service
Primary, Community & Continuing Care
HSE West
St. Mary's Headquarters
Castlebar
Co. Mayo
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30th September 2013

Ms. Noeleen Keavey,
Environmental Licensing Programme,
Office Of Climate, Licensing & Resource Use,
EPA Headquarters,
Johnstown Castle Estate,
County Wexford.

Environmental Protection
Agency
- 2 OCT 2013

Applicant Mr. Paraig Kiely, Tulrahan, Claremorris, Co. Mayo.
Activity 6.1.0 (Intensive Agriculture) The rearing of poultry in
installations, whether within the same complex or within
100m of the same complex, where the capacity exceeds 40,000
places.
Ref No's. EPA P0923-01 HSE EHIS 0033

Dear Ms. Keavey,

Further to your correspondence seeking comments in relation to this application, I would like to bring the following observations to your attention for your consideration.

Your notification to the HSE of this application was forwarded to Estates Management, Emergency Planning, Health Protection and Dr. Declan Bedford RDPI within the HSE for observation/comment. No such comments have been received and this report is the Environmental Health response to your statutory consultation.

The assessment consisted of a study of documentation on the EPA website, EPA guidance documents and a visit to the site of the activity at Carrowhawny, Ballyhaunis, County Mayo. No additional measurements/investigations were undertaken and comments are limited to matters relevant to the HSE.

Soiled wash water

Confirmation of the spreadlands for soiled washwater should be sought from the applicant. The EIA non technical summary specifies the applicants land (section 3) but specifies the farm of a Mr. Dermott McGuire, Cornacarta, Tulrahan, Claremorris in the introduction to the EIS



Disposal of veterinary/chemical waste and containers

The EIS states that containers are to be "thoroughly washed out with the washings stored in the waste water storage tank". This soiled water is to be land spread. Cleaned veterinary/chemical containers are then to be collected "by the licensed waste company, Wers Waste Ltd."

This does not appear to comply with best practice and is at odds with advice from Teagasc stating that disposal should be as per manufacturers' instructions, that items such as animal remedies/medicines should not be disposed of in domestic rubbish, down drains or watercourses or into household sewage and that use should be made of any schemes whereby such unused chemicals/medicines are returned to the supplying veterinary surgeon/pharmacist for correct disposal.

Ground Water Quality / On-site borehole

The EIS indicates the quality of the water "is monitored by the applicant on a regular basis". The EIS contains reference to two samples taken on the same day (12th July 2013) and analysed for microbiological parameters. While results of analysis of these samples indicate the water to be free from microbiological contamination at that time, ongoing periodic monitoring would be required to determine if these results are representative of the general quality of the water.

Pest Control

A comprehensive rodent baiting program is in evidence at the site. However, the bird houses were seen not to be rodent proof, particularly where service pipes were entering the buildings and holes in walls not filled in. Intensive agriculture presents a significant attraction to pests and every effort must be made to ensure the activity does not impair or interfere with amenities or the environment at the installation or beyond the site boundaries at neighbouring lands/properties.

An open bucket/small bin, ¾ filled with caracasses was observed adjacent to the covered carcass refuse skips at the time of my visit. This material was covered with bluebottles and was attracting a large number of crows to the site.

I would like to clarify that no complaints relating to Environmental health matters (noise, odour, dust, pests, water contamination) have been made to this office concerning activity at this site.

Yours Sincerely,

Tim Coffey
Senior Environmental Health Officer