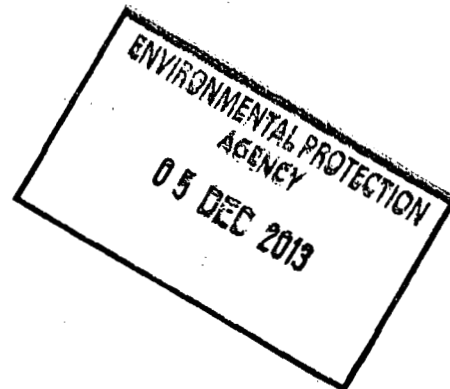




Iascach Intíre Éireann
Inland Fisheries Ireland



Ms. Gráinne Oglesby,
Environmental Licensing Programme,
Office of Climate, Licensing and Resource,
Environmental Protection Agency,
Headquarters, PO Box 3000
Johnstown Castle Estate,
Co. Wexford

3 December 2013

Re: IPPC Licence Application P0974-01, EIS from Bulrush Horticulture Limited

Dear Ms. Oglesby,

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.*"

We refer to the Environmental Impact Statement from Bulrush Horticulture Limited in relation to the IPPC licence application registration P0974-01. IFI have the following observations to make in regard to the EIS. This site is located in the catchment of the River Inny, which is part of the Shannon River Basin District.

Buffer zones of 25m should be maintained for all site operations as listed in section 2.3.2, i.e. ditching, profiling, milling, turning, ridging and harvesting. In addition, the stockpile adjacent to SW2 should be relocated so as to be a minimum of 25m from the settlement ponds to minimize the risk of sediment egress into the ponds or adjacent water-courses, via air or water. Also, IFI would request that drainage works during winter months should not take place within 48 hours of heavy rain.

Storage of fuels and oils should be in double-skinned bunded containers which are at 110% of the volume of the largest container, or 25% of the total storage volume, whichever is greater. Tanks must have 200mm freeboard for covered tanks, and 300mm freeboard for uncovered tanks. Refuelling and maintenance should take place within a bunded area with all surface run-off directed through an oil interceptor.

IFI would have concerns regarding the return period for the settlement ponds on the site, these being listed as 1 in 20 years for a two-hour rainfall event, and 1 in 5 years for a 24-hour rainfall event. Given the cumulative impact of peat operations on the River Inny, and the tendency towards more extreme rainfall events due to climate change, IFI feel it is important that a longer period should be specified for the settlement tanks. We would suggest a 1 in 50 year return period for settlement pond capacity on the site.



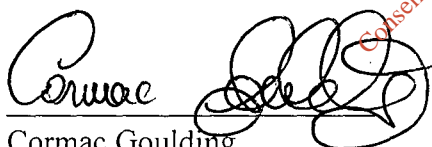
The size of settlement ponds should be calculated by the applicant based on the catchment surface area and rainfall data for an event of this magnitude. De-sludging of the ponds should take place at specified intervals to ensure the maximum working efficiency of those ponds. Ponds must be isolated before being de-sludged.

IFI would also suggest that monitoring of effluent from the settlement ponds should take more frequently. We would suggest that monitoring take place on a weekly basis, particularly for suspended solids and ammonia given the hazard of run-off from the site containing harmful concentrations of these parameters. In the case of any incident relating to any harmful discharge to water, or exceedance of the parameter limits should the applicant be awarded a licence, the licensee should notify IFI immediately after such an event.

IFI would also question the reasoning outlined in section 9.4.15 which seems to suggest that a high ammonia concentration in historic discharges and the receiving waters somehow normalises the input of ammonia run-off from the site. IFI would contend that this is all the more reason to reduce the ammonia load and concentration in run-off from the site to minimise any potential harmful impacts on water quality and fish life. We would also like to see more information on the suspended solids and ammonia load from the site on the Monkstown Stream to which emissions actually occur, rather than the Gleng River which is further downstream.

We trust you will take our observations on board and advise IFI of any decisions made.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cormac', followed by a more complex, stylized signature.

Cormac Goulding
Acting Fisheries Environmental Officer
Upper Shannon Fisheries District