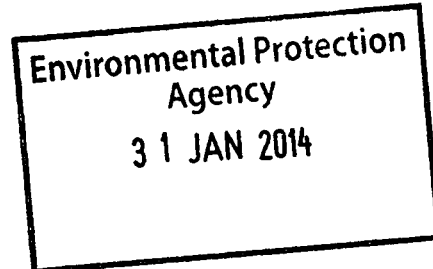




Noeleen Keavey,
Environmental Licensing Programme,
Office of Climate, Licensing and Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate.
Co. Wexford.



Our Ref: MK/14.1

29th January, 2014

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

Dear Ms. Keavey,

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.*

We note the contents of two documents, in particular, relating to the licence review, which we accessed on the EPA website, namely:

- Assessment of the impact of the Silver Hill Effluent Discharge on the Mountain Water – submitted by Silver Hill Foods
- Consent to Discharge Trade Effluent to Sewer granted by Monaghan County Council to Silver Hills Foods

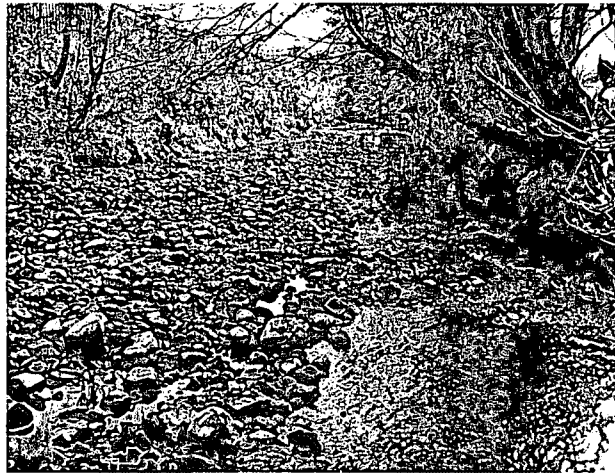
Firstly, we wish to comment on the description of Mountain Water in the Assessment of the impact of the Silver Hill Effluent Discharge on the Mountain Water, which was submitted by Silver Hill Foods.

The report appears to infer that the outflow from Emy Lough flows into the Mountain Water River (page 6). While the inflow to the lake is from the Mountain Water the outflow from the lake flows directly into the Ulster Blackwater at Figanny/Ballynahone Tds.

IFI's observations were sought by Silver Hill Foods regarding the proposal to discharge the treated effluent to the Mountain Water. For your information, we attach our comments dated 19th August, 2013.

As you can see from our letter to Silver Hill Foods we are very concerned about the sustainability of the proposal to discharge the treated effluent directly to the Mountain Water or indeed indirectly via Emyvale Wastewater Treatment Plant.

Our concern relates to low flow periods in the Mountain Water River, which is due in part to its spate nature but is also exacerbated by the weir on the river upstream of Emyvale. As a result, we believe the river's assimilative capacity is greatly reduced in low flow periods. The following photograph, taken in February 2013, illustrates our concerns.



Low flow conditions in the Mountain Water River, approximately 250m downstream of Emyvale, Feb., 2013

Given the lack of flow data from the Mountain Water at Emyvale we would urge that a comprehensive study of flows in the river at this location is carried out in order to ensure the impact of the discharge of treated effluent to the river can be completely assessed.

From a fisheries perspective the Mountain Water is a valuable resource. The river holds good stocks of Brown Trout with spawning and nursery habitat throughout. The river also contains notable stocks of crayfish, *Austropotamobius pallipes* which is an Annex II species.

Given the value of fisheries/aquatic habitat of the Mountain Water River it is vital that a detailed assessment of the proposal to discharge treated effluent to the river is carried out in order to ensure that there is, at the very least, no deterioration of existing conditions, in accordance with Article 5 of EC Environmental Objectives (Surface Waters) Regs, 2009 (S.I. 272 of 2009), 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.

Please keep us informed of progress with the licence review.

Yours faithfully,

Michaela Kirrane
Senior Fisheries Environmental Officer



Iascach Intire Éireann
Inland Fisheries Ireland

Catriona Lazdauskas,
Environmental Officer,
Silver Hill Foods,
Emyvale,
Co. Monaghan.

Our Ref: MK/14/1

19th August, 2013

Re: Proposed discharge to Mountain Water, Emyvale

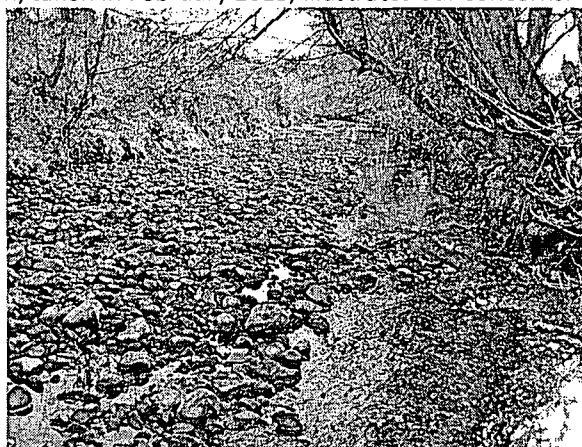
Dear Ms Lazdauskas,

We refer to your email dated 7th August last in which you outlined Silver Hills Foods proposal to discharge treated effluent to the Mountain Water River at Emyvale.

Based on the information currently available to us and our knowledge of the Mountain Water River we are very concerned about the sustainability of this proposal.

Mass Balance calculations, based on the information contained in your email and EPA's Integrated Water Quality Report 2011 (Monaghan and Louth), revealed a potential deterioration in water quality in the Mountain Water after the addition of the treated effluent from Silver Hill Foods. The most notable deterioration related to Orthophosphate where there was a greater than 3 fold increase in levels, which would result in levels above the EQS for 'Good' Status (E.C. Environmental Objectives (Surface Waters) Regulations 2009 - S.I. No. 272 of 2009).

Given the lack of flow data from the Mountain Water at Emyvale we would urge Silver Hill Foods to carry out a comprehensive study of flows the river at this location. We are concerned about low flow periods in the Mountain Water River, which is due in part to it's spate nature but is exacerbated by the weir on the river upstream of Emyvale. As a result, we believe the river's assimilative capacity is greatly reduced in low flow periods. The following photograph, taken in February 2013, illustrates our concerns.



Low flow conditions in the Mountain Water River, approximately 250m downstream of Emyvale, Feb., 2013

The Mountain Water River at Emyvale (IE_XB_03_6) has a Poor WFD status. While the General physico-chemical status is Moderate the macro-invertebrate status is Poor.

2010 Q values results were as follows:

- Station 0400 1st Bridge u/s Emyvale Q3-4
- Station 0500 Br. 1.1km d/s Emyvale Q3.

From a fisheries perspective the Mountain Water is a valuable resource. The river holds good stocks of Brown Trout with spawning and nursery habitat throughout. The river also contains notable stocks of crayfish, *Austropotamobius pallipes*, which is an Annex II species

Given the value of fisheries/aquatic habitat of the Mountain Water River it is vital that a detailed assessment of the proposal to discharge treated effluent to the river is carried out in order to ensure that there is, at the very least, no deterioration of existing conditions, in accordance with Article 5 of EC Environmental Objectives (Surface Waters) Regs, 2009 (S.I. 272 of 2009), 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.

Please keep us informed of progress with the proposal.

Yours faithfully,

Michaela Kirrane
Senior Fisheries Environmental Officer

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