



Carra Mask Corrib Water Protection Group Ltd



To whom it may concern,

I am writing to you on behalf of the Carra Mask Corrib Water Protection Group to express our concern regarding the application for an Integrated Pollution Prevention Control licence (P0981-01) for the expansion of a piggery in Levally, Ballinrobe, Co. Mayo.

The proposed spread fields for the manure from this piggery are in an area where the groundwater is categorised as Poor status in the Western River Basin Management Plan (2009-2015). In this area up to 43% is comprising of Karstic and Productive fissured bedrock which is often quite unsuitable for the spreading of slurry.

This proposed expansion incorporates an anerobic digester which cannot function without the importation of a large amount of waste from outside this already vulnerable catchment.

This proposed expansion will lead to a massive increase in Phosphates and Nitrates into this already Poor status catchment which would seem to contravene the objectives of the Water Frameworks Directive, whose aim is to achieve good status by 2015.

The figures for the proposed discharge from this piggery point to an annual production of pig manure of 3,141,583 gallons, which reflects an increase of approx. 2,350,000 gallons from the existing situation. This in a catchment where in excess of 44 million gallons of slurry are already being spread (An Environmental Appraisal and Review of the main factors contributing to the decline of the River Robe as a Salmonid Fishery - Kevin Rogers WRFB 2001).

Even allowing for the removal of 80% of P and 20% of N with fibre from the separation process, this still would lead to the addition of 8,603Kg of P and 86,559Kg of N to the catchment through the spreading of liquid digestate. This would represent a 300% increase in P and 700% increase in N from the existing levels from this piggery as it is presently operating.

Also very scant information has been provided as to the disposal of the fibrous waste from the separation process, this waste will have a very high P content (34,414Kg) as well as a high N content (25,238Kg) and it is possible that this waste will also be used within the catchment.

We feel that this proposed expansion of landspreading of waste in this catchment, of Loughs Mask and Carra, both candidate SACs who are already under threat from high phosphate levels contravenes the objectives of the Water Frameworks Directive and will make it impossible for the targets set out in the Western River Basin Management Plan (2009-2015) to be achieved.

Philip Comber

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'working for cleaner water'

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