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> Airgeadas Finance 047 30589

Na Bóithre Roads 047 30597

-Clár na dToghthóirí Register of Electors 047 30547

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> > Mótarcháin Motor Tax 047-81175

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Rialú Dóiteáin/Foirgnimh
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Date 06/11/2014

Reg. No: P1003-01

Environmental Protection

Agency

1'8 NOV 2014

A Chara,

Further to your correspondence of 21/10/2014 please find attached comments and recommendations from Monaghan County Council in relation to intensive agricultural enterprises and associated activities.

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Intensive Agricultural Enterprises and Manure Management - Co Monaghan

Background: While there are some positive signs of improvement in water quality in County Monaghan, over 50% of river sites monitored in the 2010 to 2012 period show excess phosphorus levels and many of our lakes are strongly eutrophic. There are significant legacy issues with excess phosphorus in the county; however, in combination with ongoing measures to protect and improve water quality, it is essential that the intensive agriculture sector manage manure in a sustainable manner. In order to avoid a contribution to diffuse source pollution and cumulative effects, a sector approach to manure management is considered necessary. Transport of manure to tillage lands or energy crops and the use of alternative technologies are part of the solution for sustainable manure management. Where land spreading of manure within County Monaghan is being considered nutrient management planning and assessment of land banks by professional agri/environmental scientists in consultation with relevant public authorities is required. Restrictions on manure imports to protected areas, water supply catchments and hydro geological susceptible areas must be considered. A responsible transport sector, traceability and monitoring systems also play a role in sustainable manure management.

- (a) Transport and management of manures should take account of industry best practice, the European Communities (Good Agricultural Practice for the Protection of Waters) Regulations 2014, Monaghan County Development Plan 2013 to 2019, River Basin Management Plans and DAFM requirements under the Animal Byproducts Regulations.
- (b) Intensive agricultural enterprises and their agents land spreading manure/organic fertilizer should take account of hydrogeological susceptible areas, soil/subsoil characteristics, runoff risk and the sensitive areas identified in the Monaghan County Development Plan 2013 to 2019. All necessary measures including nutrient management planning should be taken to minimize the loss of phosphorus to waters. Land banks in the vicinity of water supply sources, their feeder streams and source protection zones should not be used for land spreading imported manures.
- (c) A fully traceable manure/organic fertifiser movement system should be maintained by licensee and transporters and available for inspection by persons authorized under the Water Pollution Acts (1977 2007).

Minimisation of impact of storm water runoff

Background: Siltation has been identified as a significant issue in the loss of fishery value. Sediments transported to streams can contain phosphorus and other contaminants. Hard surface runoff and yards subject to dusts, feed delivery and manure movement traffic can generate contaminated runoff. Supplementary measures are recommended to capture and remove contaminants and fine sediments from storm water runoff.

(d) Hard surface areas should be provided with an effective silt trap. Soft engineering solutions/SuDS should be provided downstream of the silt trap to minimize sediment loss and cumulative effects of low level contaminated discharges reaching waters with fishery value.

Protection of River Corridors

(e) Development associated with intensive agricultural enterprises should not adversely affect river corridors. Where possible river and stream corridors (both river bed and banks) should be enhanced to protect and improve biodiversity, water quality and fishery value.

Environmental Protection Agency 1 8 NOV 2014