

EPA-P1031-01--4792

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

06 November 2015

RE: EPA: Reg No. P1031-01:- Colm Ryan Nantinan Milltown, Co. Kerry. Class 6.2 rearing of pigs in an installation where capacity exceeds 2,000 places each over 30 kgs.

I refer to the Proposed Determination of an application for an Integrated Pollution Control Licence in accordance with Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations, 2013, to carry out an activity for the rearing of pigs in an installation where capacity exceeds 2,000 places each over 30kgs at Nantinan, Milltown, Co Kerry.

Inland Fisheries Ireland (IFI) comments as follows based on the requirement to insure that water quality and ecological status of the Laune River and its tributaries are protected from deterioration and where necessary improved to support the salmonid fishery therein. For clarification, with reference to watercourses (aquatic ecosystems) in the area of the development, the site drains directly to and is bounded by the Keelbrogreen Stream (not a drainage ditch) which in turn flows to the Laune River, a river specifically designated as part of the Castlemaine Harbour SAC (site code 343) because, *inter alia*, of the presence of the Habitats Directive Annex 11 listed fish species Salmon and their spawning and nursery habitats.

1: There are several drainage channels from the site to the Keelbrogreen River each with the potential to transport fugitive liquid emissions to waters and as identified in the application the lands surrounding the farm buildings are nutrient rich and will not be used for disposal of slurries.

This enrichment is likely a result of previous emissions of slurry either directly or indirectly to lands from past use of the piggery and there may currently be a source of diffuse nutrient runoff to waters. Soil nutrient levels and drainage water quality should be assessed within the existing site and if proven to be a risk to surface water quality, remedial measures should be identified and implemented to reduce impacts.

2: Consideration should also be given to the status of the Keelbrogreen Stream as determined during the Water Framework Directive (WFD) characterisation of the Laune River, Water Management Unit (WMU). It found that the Keelbrogreen Stream (22-2130) was of poor ecological and fishery status and at risk of not achieving good status based on agricultural inputs. This poor quality status also applies to

several rivers close to the development site e.g. the Gweestin River and with the Laune River at moderate ecological status there is a need to insure that land use practices e.g. land spreading of slurries does not give rise to additional diffuse runoff to the Laune River and its tributaries.

3: Information on spread lands in use and those proposed for accepting slurries from this development should be detailed in the application with soils assessed in the first instance as being suitable for accepting a high nutrient slurry and then of sufficient area to accept the annual volume of slurries generated in the piggery. This information should be based on current soil nutrient status and determination of suitability should conform to the most recent agronomic recommendations.

An activity which has the capability of causing water quality deterioration must be operated in a manner which eliminates risk to the aquatic environment. IFI considers that information provided in this application fails to identify if there is an existing diffuse nutrient runoff issue at the development site and how the disposal of slurry generated on site can be undertaken in a sustainable manner within the Laune River catchment.

IFI requests that the above issues be considered.

Yours sincerely,

Patricia O'Connor  
Senior Environmental Officer.

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**Liz Leacy**

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**From:** Licensing Staff  
**Sent:** 09 November 2015 08:20  
**To:** Liz Leacy  
**Subject:** FW: New submission entered for Reg no: P1031-01. (Reference Number: P1031-01-151106081618)  
**Attachments:** EPA-P1031-01- Nantinan Piggery-4792.doc  
**Importance:** High

**From:** Patricia O'Connor [<mailto:patricia.oconnor@fisheriesireland.ie>]  
**Sent:** 06 November 2015 20:16  
**To:** Licensing Staff  
**Subject:** New submission entered for Reg no: P1031-01. (Reference Number: P1031-01-151106081618)  
**Importance:** High

**Title:**

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