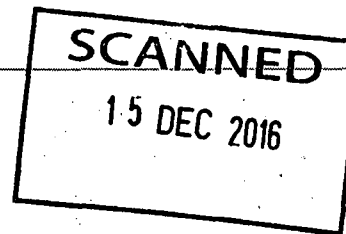


Noeleen Keavey

Subject: FW: IPPC Licence application P0096-03

From: Foreshore EPA Marine [mailto:fem.dau@ahg.gov.ie]
Sent: 15 December 2016 14:21
To: Wexford Receptionist
Subject: IPPC Licence application P0096-03



Re: IPPC Licence application P0096-03 by Saint Gobain Performance Plastics Ireland.

A Chara,

On behalf of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs I refer to the above.

Outlined below please find the Nature Conservation observations.

The Department refers to the EPA's notification of the current licence review application by Saint Gobain Performance Plastics Ireland for their facility at Kilrush Business Park, Kilrush, Co. Clare. It is understood that an existing IPC licence is in place, and that the licence review is required because of a change in processing which results in a new class of activity to be licensed: i.e. *"the use of coating material in processes with capacity to use at least 10 tonnes per year of organic solvents, not included in class 12.2.1"*.

The following observations are made in the context of this Department's role in relation to nature conservation. They are not exhaustive and are offered to assist the EPA in meeting any obligations that arise in relation to nature conservation in the context of this licence review, and the screening for appropriate assessment which has yet to be carried out.

The Saint Gobain Performance Plastics Ireland site is located on the northern outskirts of Kilrush, approximately 2km from the European sites, Lower River Shannon cSAC (site code 002165) and River Shannon and River Fergus Estuaries SPA (site code 004077).

The application documentation is extensive and includes a 'Report for Appropriate Assessment Screening' by Moore Group – Environmental Services, dated 24/06/16, in Appendix 6(f). This report rightfully identifies the two European sites most likely to be at risk from the development, and includes or summarises the site specific conservation objectives for these sites. Statements are then made that there will be no direct, indirect or cumulative effects arising from the change in processing or chemicals used in line with the licence review. The EPA should note, however, that these statements in the 'screening report' are not substantiated by any information on or examination of:

- changes in processing or emissions that will/could result;
- pathways and sources of impact other than hydrological;
- emissions from the existing facility, noting that it is the subject of ongoing monitoring in connection with the existing IPC licence⁽¹⁾;
- current levels of emissions licensed;
- the extent of compliance with existing licensing of emissions and discharges; or
- existing water quality trends and status in the receiving (marine or estuarine) waters.

The analysis in the 'screening report' is based primarily on fact that existing permissions and licences are in place, and were subject to their own assessments in the past.

The above is of relevance to the screening for appropriate assessment which the EPA must carry out under Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations, 2011. The EPA will be aware that an appropriate assessment is required if it cannot be excluded that a project on its own or in combination with other plans and projects, will have a significant effect on a European site in view of its conservation objectives; best scientific knowledge and objective information should underpin any determinations made.

Mise le meas,

Simon Dolan
Development Applications Unit
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs
Newtown Road
Wexford

tel: 0539117377



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An Roinn Ealaíon, Oidhreachta,
Gnóthaí Réigiúnacha, Tuairhe agus Gaeltachta
Department of Arts, Heritage,
Regional, Rural and Gaeltacht Affairs

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¹⁴ Including monitoring of: emissions to air from thermal oxidiser; emissions to sewer of process wastewater; emissions of stormwater (rainfall from roof and yards) to soakpit; and noise emissions

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