



### Submission

Submitter:	Mrs Lisa Maguire
Organisation Name:	Health Service Executive
Submission Title:	Environmental Health Submission
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### Application

Applicant:	Pfizer Ireland Pharmaceuticals
Reg. No.:	P0153-06

See below for Submission details.

Attachments are displayed on the following page(s).

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12th July 2019

## HSE EIA SCOPING REPORT

### Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000,  
& Regs made thereunder).

**Date:** 12<sup>th</sup> July 2019

**Type of consultation:** Scoping

**Planning Authority:** EPA

**EPA Reference:** PO153-06

**EHIS Reference:** 0975

**Applicant:** Pfizer Ireland Pharmaceuticals

**Proposed Development:** Review of Industrial Emissions (IE) licence P0153-05 to take into account the proposed introduction of new production processes at Pfizer's existing facility located at Buckley's Cross Roads, Old Connell, Newbridge, Kildare.

### Introduction

The proposed development is an IE licence review application from Pfizer Ireland Pharmaceuticals which relates to the introduction of new production processes necessary for the manufacture of Gastrointestinal Therapeutic System (GITS) products,

to provide additional capacity at the existing Technology Innovation Centre (TIC) on site and to install a new steam boiler at their existing Newbridge facility.

The main class of activity as set out in First Schedule of EPA Act 1992. as amended, is:  
*12.2.1 – The surface treatment of substances, objects or products using organic solvents, in particular for dressing, printing, coating, degreasing, waterproofing, sizing, painting, cleaning or impregnating, with a consumption capacity of more than 150kg per hour or more than 200 tonnes per year.*

The proposal involves development for which a grant of planning permission is not required.

The applicant proposes to prepare an EIAR which will assess the direct and indirect impacts of the proposed development on the environment. The assessment will consider the baseline scenario to be the existing Pfizer Newbridge site, facility and operations in their current permitted form. The impact of the proposed project will be assessed against this baseline.

The applicant states the EIAR will also include a cumulative impact assessment, which will consider the baseline scenario plus the proposed project as well as other factors which may affect the baseline environment. The cumulative impact will be assessed against relative criteria, e.g. the Air Quality Standards and all relevant limits outlined in the new IE licence.

Specific impacts will be assessed by the applicant in the following format:

- Description of the proposed development, as outlined above, including VOC abatement;
- Impact assessment of the proposed development on the environmental aspect;
- Proposal for mitigation measures;
- An assessment of residual effects.

The Following HSE Departments were made aware of the scoping request on the 9<sup>th</sup> July 2019:

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Ann O'Shea

**This report only comments on Environmental Health impacts of the proposed Development:**

It is essential the nature and scale of the proposed impact is correctly predicted during the EIA process. An assessment of the significance of the impact must also be carried out. Any change to the baseline environment must be identified and assessed.

The following specific information should be included in the EIAR:

**Description of the Project:**

The EIAR should fully describe all manufacturing processes outlined in the proposal. All potentially polluting compounds and sources of emissions shall be identified and their potential impact on the surrounding environment shall be assessed. Containment, treatment and disposal options for all potential emissions shall be outlined. Any residual impacts, after mitigation, shall be identified and discussed.

With regard to the construction phase of the project all significant impacts should be identified and assessed. Proposed mitigation measure should be fully described. A comprehensive construction management plan outlining specific control measures should be provided in the EIAR.

Information on possible future monitoring requirements for the operation of the facility should be included in the EIAR.

**Consideration of Alternatives:**

The reasons for choosing the proposed treatment options and disposal processes shall also be outlined.

**Public Consultation:**

Meaningful public consultation with the local community should be carried out. All legitimate concerns from the public shall be fully addressed and evaluated. The EIAR should clearly demonstrate how the outcome of consultation with the public influenced decision making within the EIA.

**Noise:**

The impact of noise from both the construction phase and the operational phase of the proposed development shall be assessed. It is recommended that up to date baseline monitoring shall be carried out to establish the existing noise environment. Noise sensitive receptors shall be identified. Appropriate noise assessment modelling should be carried out to accurately predict the change in the noise environment. This

information should be outlined and clearly displayed in the EIAR. It is the opinion of the Environmental Health Service that adherence to absolute noise limits may not always protect sensitive receptors against noise nuisance and that it is often the change in the existing noise environment that is of the most significance, therefore the significance of the predicted change in the noise environment should be fully assessed and the criteria for the evaluation of the significance clearly identified.

The potential cumulative effects of other industry in the vicinity of the development should also be assessed as part of the noise survey. All mitigation measures for the control of noise shall be described.

### **Water:**

All drinking water sources, both surface and groundwater (including individual private wells) shall be identified. Any potential impacts to these drinking water sources shall be assessed. Details of bedrock, overburden, vulnerability, groundwater flows and gradients, inner and outer zones of protection and catchment areas should all be considered when assessing potential impacts and possible mitigation measures. The EHS would recommend that all information is gathered by means of a site survey as desktop studies do not always accurately reflect the current use of water resources.

Any potential impacts of surface water runoff should be assessed and mitigation measures detailed. Site drainage, increased rainfall and the possibility of flooding should all be considered when identifying possible impacts and mitigation measures.

### **Air:**

The potential impacts of air emissions and the possibility for odour generation as a result of the proposed development should be clearly assessed in the EIA. Proposals for the capture, containment and treatment of potentially harmful emissions shall be outlined.

### **Sustainability:**


Energy efficiency should be incorporated into the design of the proposed development and an energy management programme should be developed and implemented during the operational phase. The proposal should be have cognisance of Meath County Councils 'Climate Action Plan' and building typologies that minimise the use of energy, SuDS management initiatives, the integration and utilisation of open space and water conservation/reuse measures are some of the options that could be explored to reduce the carbon footprint of the proposed development.

**Cumulative Impacts:**

In line with the EPA Guidelines on the information to be contained in Environmental Impact Statements (2002) and their Advice Notes on Current Practice in the preparation of Environmental Impact Statements (2003) the EIA should include the assessment of cumulative impacts of any other industrial or energy developments in the area.

**Decommissioning:**

The EIAR should describe proposals for decommissioning the facility at the end of life of the project. The residual impact of the development on the environment must be fully assessed.

  
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Lisa Maguire  
Environmental Health Officer

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to: [lisa.maguire@hse.ie](mailto:lisa.maguire@hse.ie)

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