



Submission

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Application

Applicant:	Dairygold Co-Operative Society Ltd and TINE Ireland Ltd
Reg. No.:	P1103-01

See below for Submission details.

Attachments are displayed on the following page(s).

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The proposed expansion of the Dairygold Cheese Plant at Mogeely is a positive development. It will create employment and boost agricultural production and exports.

However the proposal to discharge huge volumes of waste water to an enclosed body of water in Cork Harbour is bizarre when alternatives are available.

The fact that the developers have chosen to build a pipeline for which they have planning permission but for which they have no licence to use should in no way influence the decision for a discharge licence.

Angling in Cork Harbour is a hugely important generator of Tourism Revenue and is still untapped in its potential. In 2012, Tourism Development International (TDI) on behalf of Inland Fisheries Ireland conducted their 'Socio-Economic Study of Recreational Angling in Ireland'. The report, which was published in 2013, estimated the total economic contribution of recreational angling in Ireland to be approximately €755 million with an estimated 406,000 individuals having participated in angling over the course of 2012. Fish stocks, in particular Bass are protected by law. The angling community have embraced this conservation approach and the Planning process should show the same respect to them. Bass, their movements and sensitivity to environmental factors were not considered at all in the EIS. This is a serious deficiency that needs to be remedied.

The Fundamental statements, assumptions and modelling used in the EIS, which was compiled on behalf of the applicant should be **rigorously verified by independent experts**.

The Natura Impact Assessment never proceeded to stage 3 because it concluded that there was no risk to the habitats and protected species of the Great Island Channel SAC and Cork Harbour SPA. This is a wholly unproven fact and highly questionable assumption when that volume of waste water is discharged into the inner reaches of Cork Harbour where it can travel further into the Harbour and where there is no flushing effect.

Alternatives should have been considered but even at the Planning stage it seems that the only alternative considered by the developers was to discharge to the Kiltha River Planning Application

3.3.2 New treated effluent discharge pipeline The Kiltha River does not have the capacity to accept the increased volumes of treated wastewater. Therefore a new discharge point is required. As part of this development proposal it is being proposed to discharge treated process effluent into Cork Harbour at Rathcoursey. The pipeline route selection process initially commenced by defining a broad area of search between the two fixed start and end points. Two general route options for the treated effluent discharge pipeline were considered as follows: Option 1 (Figure 3.3) – Combination of Off-road and On-road route Option 2 (Figure 3.4) – On road only route (Option 2a and Option 2b)

In effect, no alternative discharge point appears to have been considered at all.

5.3.1.2 Wastewater discharge pipeline The wastewater discharge pipeline will be installed along public road for a length of 13.61km from the on-site WWTP to the Midleton Main Drainage Outfall at Rathcoursey.

The obvious outfall point was to the open sea along the public road which is approximately 8 km and seemed a logical option for investigation.

No alternative process for the treatment of waste on site seemed to have been considered either. Anaerobic digestion of the waste would produce methane that could be used in the boiler, exported to the National grid or used to produce electricity on site in a Combined Heat and Power Plant.

Dairygold is a progressive company with strong brand recognition and Green credentials. Treating valuable waste in this way would be a perfect progressive, environmentally friendly and cost effective investment for them. First Milk's Aspatria Cheese plant in the UK uses this process and Dairygold/TINE could have too.

<http://clearfleau.com/portfolio/lake-district-biogas-green-gas-from-cheese-residues/>

This application for a discharge licence should be rejected and alternatives that pose no threat to Cork Harbour's Wildlife and Amenities used instead.

Hendrick Verwey

21/08/2019

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