



Submission

Submitter:	Mr Save Cork Harbour SAVE CORK HARBOUR
Submission Title:	Objection to industrial effluent licence
Submission Reference No.:	S005711
Submission Received:	03 September 2019

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).

For inspection purposes only.
Consent of copyright owner required for any other use.

We, the members of Save Cork Harbour strongly object to the granting of Dairygold's industrial emissions licence into the North channel at Rathcoursey /East Ferry based on the following facts.

1. In Dairygold's Natura impact statement there was a complete lack of acknowledgment that the 4 million litres of grey water containing FOG (fats, oils and grease) would have any adverse impacts on the surrounding water quality. The information given in Dairygold's application specifically contradicts scientific evidence carried out by NUI Galway. These studies show that any pollutant or substance that is released in the pipe outfall area or surrounding area predominantly stays and accumulates there for a period of up to 70 days, despite the coming and going of tides. Dairygold have implied in their application that the effluent will be swept off to open ocean after releasing it on ebb tide. The notion that new tidal water will return to the outfall pipe area to replace or refresh the area contradicts the scientific evidence. Yes, the tide will return but it will bring with it exactly what it was released with, namely industrial effluent containing FOG. This is a very narrow channel of water and only a fraction of this water reaches open sea. In other words there is very little capacity for this effluent to leave the area, and studies prove the same. In fact the water stagnates in the north channel, according to the NUI Galway study from 2012.

Another study carried out by local transition students some years ago under the guidance of their teacher Mr Ray Power, coincides with the results from NUI Galway.

2. We are already living in a sacrifice zone, in that we are receiving sewage from the town of Midleton directly into the north channel, this is the same pipe that Dairygold are connecting into. The visual and odour evidence of sewage is becoming more and more worrying as the population of Midleton grows. In addition to this, we are also accepting Irish distillers waste water from the Jameson distillery in Midleton. We also have evidence that show that there are high levels of nitrogen and phosphorus in the north channel, thereby increasing the level of toxicity in the water.
The combination of all of these components entering the north channel from the one pipe source lends itself to the question of an unknown chemical 'cocktail' entering the water and accumulating over time. Why haven't Dairygold looked at alternatives?
3. Of course there are alternatives. Possible alternatives include constructed wetlands and irrigation of farm land. A newly constructed cheese factory in Cumbria employed Clearfleau who manufactured an AD plant to convert the excess liquid waste into biogas on site. This in turn generates power for the factory.
Dairygold have chosen to ignore alternatives which they have an obligation to do under EU Law. In fact, in the present application Dairygold has not even mentioned the EXISTENCE of alternatives!
4. We are concerned with the vast quantity of industrial effluent mentioned in the application. Dairygold have stated that up to 4 million litres of effluent per day would be released and that the FOG concentration in that is 15mg per litre. This attributes to 60 kg of FOG per DAY being released. This is 22 tonnes per year for the life time of the operational factory.

5. The pipeline is sandwiched between two areas of concern. One is an environmentally protected area and the other is a special area of conservation. Both contain protected bird and fish species such as sea bass and egrets, amongst many other species. When the tide goes out the layer of FOG at the surface of the water will be deposited on the mud flats that are exposed at Low tide. These mudflats are actually feeding grounds for protected birds. A detailed analysis as recent as 2nd September by the NPWS highlights all of our concerns about the marine life and water quality. <https://greennews.ie/dairy-expansion-marine-biodiversity/>
6. We have no issue whatsoever with any appropriate development that Dairgold embark on. However, we as local residents would urge the EPA not to grant this licence, both for the sake of the safe recreational use of the water that we and our children want to avail of and enjoy for the future, as well the protection of the marine life which exists in the second largest harbour in the world.

Our junior infant pupils in our local school know that oil and water do not mix. We strongly urge the EPA to not grant this ludicrous licence.

Kindest regards,
SAVE CORK HARBOUR

For inspection purposes only.
Consent of copyright owner required for any other use.