



Submission

Submitter:	Helena Walsh
Submission Title:	Climate Aware Middleton
Submission Reference No.:	S005717
Submission Received:	29 August 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).

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ENVIRONMENTAL PROTECTION AGENCY

- 3 SEP 2019

CORK

Climate Aware Midleton

c/o Helena Walsh

Green Field Farm

Aghaduff, Knockraha, Co. Cork



27th August 2019

Ref: Dairygold Cooperative Society Ltd and Tine Ireland Ltd Application for EPA Industrial Waste Discharge Licence no. P1103-01

Dear Sir,

Climate Aware Midleton is a small newly formed group primarily concerned with mitigating Climate Change and preparing for whatever it brings. In the course of our discussions it is evident to us that Climate Change is a multifaceted subject, embracing every sort of environmental topic, in particular the imperative that we clean up and preserve the natural habitat so that biodiversity and humanity can flourish.

Please consider the following points:

- In 2015 the EU Commission adopted an action plan aimed at accelerating the shift towards a circular economy where wastes can become resources. Here, four years later a cheese factory in Mogeely is choosing instead the old fashioned linear model, drawing water from underground, using it in their processes and piping the waste water out to Cork Harbour. Alternative land based alternatives for closed loop waste/resource management are already available, many cheaper to install and operate and with far less adverse environmental impact than the current end of pipe disposal here proposed.
- Also, from the Dairygold/Tine Environmental Impact Statement (EIS), the EU Waste Water Framework Directive classifies the Inner Harbour as having only moderate cleanliness status and being at risk of not achieving good status, despite the Framework objective for that area to have good status restored by 2021. We see the adding of the extra Dairygold/Tine waste water as up-scuttling that goal.
- Furthermore in the EIS different stretches within the Great Island North Channel and Inner Harbour areas are already designated as a Special Area of Conservation, a National Heritage Area, a Designated Shellfish Area, a Nutrient Sensitive Area and an area "at risk of not achieving 'good' status". Adding more waste water to that body

of water in the Inner Harbour is surely incompatible with our obligations of care under the EU Urban Waste Water Framework Directive.

- We are deeply upset at the proposal to pipe waste from the new Dairygold/Tine cheese factory into the Inner Harbour of Cork Harbour, and we suggest that even at this late stage of the planning process that it is not too late to consider alternative solutions. If these solutions are not introduced at this time we suggest that the EPA introduces more stringent pollution requirements that will bring the factory more into line with a circular economy on a fairly steep time frame.
- We understand that already Ireland is being fined for breach of waste water limits. If this pipe is licenced to discharge into the Harbour who will pay the fines if the Inner Harbour and the sewage outfall exceed their limits? Will it be Dairygold/Tine or their advisers, or maybe Irish Water. Will it be the EPA? Or will it be the tax payer, you and I?
- Alternatives already tried and tested in Ireland and internationally are Anaerobic Digestion (AD) of whey for example, to provide methane gas and/or electricity for sale or for using on site. Constructed Wetlands as used in the smaller cheese factory in Kilmeaden where the effluent did not once break its emission limits during its eight years of operation. Willow plantations for biomass, which could fuel a biomass boiler, saving on imported fossil fuels and moving the facility towards a carbon neutral state. Recycling waste water to replace water from underground where ever possible.
- You, the Irish Environmental Protection Agency, are the people who can make a difference for the Irish environment. You grant and issue licences to industry that put limitations on what they can emit to the environment. You are the ones who enforce compliance, and can really put a stop to bad practice on the part of polluters, and you are already doing this. When people or industry lobby for slacker rules, you are the ones who can say 'No.' We all want to be proud of our industry, our countryside, our waterways and coasts. We are depending on you to stand firm and to keep them clean and healthy. On our part we will continue to help you with our tidy towns and beach clean-ups.

Finally we entreat you to take note of the EU directives and requirements and help us deliver on our commitments. We oppose this licence.

Yours faithfully,

Signed:

Ref: Dairygold Cooperative Society Ltd and Tine Ireland Ltd Application for EPA Waste
Discharge Licence no. P1103-01

Signed: (Continued)

Katherine Wenzel.

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