



Submission

Submitter:	Mr. Féidhlim Harty
Submission Title:	FH Wetland Systems Ltd - Received by email.
Submission Reference No.:	S005908
Submission Received:	19 December 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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Subject: FW: Submission re EPA Industrial Waste Discharge Licence no. P1103-01
Attachments: Dairygold Trine EPA letter.pdf

From: Feidhlim Harty <reeds@wetlandsystems.ie>
Sent: 19 December 2019 14:58
To: Wexford Receptionist <REC_WEX@epa.ie>
Subject: Submission re EPA Industrial Waste Discharge Licence no. P1103-01

FAO Noleen Keevy,

Dear Ms Keevy, please find submission attached.

I grew up canoing and wind surfing in Cork Harbour, so even though we have moved to Clare I have a great love of the harbour area. My grandparents Ivan and Myrtle Allen of Ballymaloe also had great time for Dairygold, and I have worked in some of their factories and am friendly with their employees, so I am not knocking them as an organisation by any means.

Indeed, Tine, the Norwegian partner in this factory, is the producer of Brunost, a sweet whey cheese, a favourite present from my Scandinavian inlaws, so I seem to have connections to all sides of the situation!

I would be grateful if you could read my letter with an open mind and heart and really do the right thing for the harbour area. Who knows, perhaps Dairygold can rent out binoculars to birdwatchers at the wetland that I am proposing for use prior to discharge, as has been done on the municipal sewage treatment wetland at Arcada California.

Kind regards

Féidhlim Harty

New book by Féidhlim Harty: *Towards Zero Waste - How to Live a Circular Life*
See www.wetlandsystems.ie/shop.html

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19 December 2019

Noleen Keevy,
Licence Officer,
EPA,
Johnstown Castle Estate,
Co. Wexford.
info@epa.ie

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

Dear Ms. Keevy,

In view of the disappointing water quality results in the recent *Water Quality in Ireland 2013-2018* report, particularly the net drop in ecological status for rivers and transitional water bodies, and also in light of the current biodiversity emergency in Ireland and globally, it is surely now essential to reduce existing flows of nutrients and other pollutants into our inland and coastal waterways and to stop addition of new sources of pollution.

Cork Harbour is shown in the new report to have poor to moderate ecological status, so further additions of nutrients are clearly not acceptable. Moreover the Dairygold EIS acknowledges that close to the immediate area of the outfall point and in the wider harbour area there are a Special Area of Conservation, National Heritage Area, Designated Shellfish Area, and Nutrient Sensitive Area. Under such circumstances it would be counter to our current national and international biodiversity and water quality objectives to permit the new Dairygold/Tine discharge licence into this area.

As a suitable alternative to the existing proposal, constructed wetlands or a willow filter could be used at the factory site in Mogeely as an effective way to filter large quantities of water to background environmental quality prior to discharge. They are also generally more cost effective to build and to run than standard mechanical treatment. In addition, they can create diverse wildlife habitats and contribute to Ireland's GHG emission reduction targets by providing sequestration of atmospheric carbon as the peat layers of plant biomass accumulate naturally in the system (wetland option) or as woody biomass (willow option).

Before granting a discharge licence for the new Dairygold/Tine cheese factory I would strongly suggest that you require treatment of all effluent to background environmental levels of nutrients and other parameters using a wetland, willow system or equivalent nature based solution. I have been offering these systems as part of my work over the past 23 years, so to avoid a conflict of interest and to emphasise the need for environmental protection rather than economic gain may I suggest that you approach VESI Environmental in Little Island for constructed wetland advice/designs and Laurence Gill, head of the school of engineering in TCD for willow system advice or designs.

Please do not hesitate to call or email with any questions on any of the above information. I look forward to your response.

Yours sincerely,

Féidhlim Harty



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