



Submission

Submitter:	Mr Liam Quaide
Organisation Name:	Mr.
Submission Title:	SubSubmission on Dairygold waste discharge licence
Submission Reference No.:	S005918
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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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Submission to the Environmental Protection Agency on the licence application by Dairygold Co-Operative Society Ltd and TINE Ireland Ltd Licence application registration number P1103-01

1st January 2020

As a public representative for the people of East Ferry and as a member of the broader East Cork community I object to the granting of this waste water licence in the strongest possible terms. I object also as a psychologist who is keenly aware of the emotional impact on a community of feeling powerless in the face of decisions that no amount of evidence or reasoned argument appears to influence. I hope that reason, evidence and ethics will prevail in this case, even at this late stage of what has been a prolonged struggle for the community affected. Like, I believe, anyone else objecting to this waste discharge licence I support the Mogeely cheese plant itself and recognise its economic importance.

I believe it is absurd that the waste water pipe was laid between Mogeely and East Ferry - with all the upheaval, increased traffic congestion and irreparable damage to the road that those works involved - prior to the granting of this licence by the EPA. I am concerned that the cost implication and further upheaval associated with refusing the licence at this stage – and thereby the rerouting of the waste discharge – places the EPA in a highly pressured situation to grant the licence, despite there being no reasonable case - ethically or environmentally - to do so.

Having dealt with similar planning issues where large, costly projects have been progressed very far, I'm aware that even when serious concerns about the project have not been addressed, enormous pressure falls on the final decision-maker(s) to see the project over the line. The sequencing of these works in this case call into question our planning process. I hope that the EPA decision- makers(s) will be guided by the scientific evidence set out in the authoritative submissions on this proposal, and that their ethical standards would withstand the undoubted political pressure that they are under to grant this licence despite Dairygold relying on a flawed Natura Impact Statement and despite their having shown no evidence of consideration of alternatives to this waste discharge plan.

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It is clear from Dr. Gordon Reid's / Ms. Catriona Reid's methodical submission on this proposal that Dairygold's Nature Impact Statement (NIS) is seriously flawed. Dr. Reid shows that Dairygold's NIS contains a claim that water will undergo an 80% exchange when there is a discharge of waste on the ebb tide. There is no basis or source given in the NIS for this highly optimistic figure. The figure is used to argue that no risk exists to the habitats and protected species of the Great Channel Island Special Area of Conservation (SAC) and Cork Harbour Special Protected Area (SPA). This claim is directly contradicted by an independent report completed by Irish Hydrodata Ltd. for Irish Water, which drew on earlier research. Dr. / Ms. Reid detail the implications of a much lower exchange value, identified in this research, which greatly increases the risk of mixing and accumulation of pollution resulting from the discharge proposal.

Dr. / Ms Reid point out that claims in Dairygold's NIS that "there will be no significant elevation in nutrient or BOD concentrations owing to the proposed WWTP discharges" were made before the Irish Hydrodata Ltd. report was included in it. Therefore this part of the NIS does not stand up to scrutiny. Indeed, there appears to be no contrary evidence proffered to establish the NIS claim, prior to this other research coming to light.

Dr. / Ms. Reid highlight the lack of detailed consideration in the NIS of where released effluent will end up in the restricted space of Cork Harbour. He references a 2012 study by NUIG researchers (Hartnett et al) which shows that residence times of waters in Cork Harbour can be over 60 days; in the region of the Rathcoursey outflow and the East Ferry channel it is around 50 days.

Dr. / Ms. Reid point out that European legislation mandates appropriate assessment of conservation sites (the Cork Harbour Special Protected Area and the Great Island Channel Special Area of Conservation). The documents submitted by Dairygold to date represent stage 1 (screening) and stage 2 (NIS) of such an assessment process. As the NIS has not shown that adverse impacts on protected wildlife can be ruled out, Dairygold is obliged to proceed to stage 3 (assessment of alternative solutions). The standard that must be reached by Dairygold is that "no reasonable scientific doubt as to the absence of such effects".

Alternatives to the current waste discharge proposal were requested by Cork Co. Council at an earlier stage in the planning process. Dairygold's response to this request contained no analysis of alternatives. I wrote to Dairygold in June 2019 asking for details on alternative waste water plans they have considered and received a general paragraph on their commitment to environmental standards but no answer to that question.

Given the serious flaws in Dairygold's Natura Impact Statement and the contrary evidence from independent sources that protected species and water quality would be at significant risk from their waste discharge; also given Dairygold's lack of consideration of alternative waste discharge plans, and given the collective dismay felt by much of the community in East Ferry, as well as those in Cork generally who are concerned about conservation and water quality, the granting of this licence would be ethically and ecologically indefensible. The laying down of a waste discharge pipe under the road from Mogeely to East Ferry prior to the granting of this licence places serious political pressure on the EPA to sign off on this licence. In a time of mounting environmental crises, where our natural world is under ever increasing threat, it is all the more imperative that state agencies make their decisions based on evidence and ethics.

Yours sincerely,

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