



Submission

Submitter:	Miss Deborah Hayes
Submission Title:	Objection to industrial effluent licence
Submission Reference No.:	S005926
Submission Received:	03 January 2020

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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On behalf of the community group 'Protect East Ferry Waters' I wish to object to the proposed waste licence application put forward by Dairygold and TINE based on the following facts;

1. The proposed outfall site is in extreme close proximity to a SAC and a SPA. This is no place for the outfall pipe to release FOG (Fats , oils and grease) There has been a complete lack of acknowledgment in Dairygold's NIS that upstream FOG pollution will in fact cause adverse effects on water quality in these protected areas as well as impacting negatively to the multiple sources of protected wildlife residing there. This blatant lack of analysis in the NIS of the possible deposition of fats oils and grease on the surface of mud flats and the effects of such deposition on feeding birds is quite frankly negligent.
2. Water quality will be impacted. Sweeping claims in the NIS that there will be "no significant effect on water quality" contradict studies that have been carried out by NUI Galway in the North channel showing clearly that anything that is released at the north channel does not simply get brought out to sea, but rather, builds up in the region and accumulates. In fact only a fraction of the water in the harbour goes out to sea with each tide. This is going to impact significantly on the multiple mud flat areas around the proposed outfall pipe thereby impacting on protected birds and their ability to feed. No consideration has been given to this accumulation of pollution by the applicant.
3. No alternative discharge points were considered, despite a legal obligation for Dairygold and TINE to do so. This is utterly unsatisfactory especially considering that there are many. Possible alternatives include constructed wetlands, irrigation of farmlands, and the disposal of effluent directly into the ocean. These alternatives have been suggested in detail to Dairygold and the public authorities during consideration of the planning application by the council and An Bord Pleanála. Why is it that Dairygold has not considered any of these?

We hope that these issues are taken into consideration in this process.

Yours sincerely,

Debby Hayes, Protect East Ferry Waters.

Dated 3.01.2020