



### Objection

Objector:	Mr Simon Mould
Organisation Name:	Save Cork Harbour campaign
Objector Address:	Gortstoke, Ladysbridge, Co. Cork.
Objection Title:	Objection #OS005997 - 3rd party objection for Reg No:[P1103-01]
Objection Reference No.:	OS005997
Objection Received:	13 March 2020
Objector Type:	3rd Party
Oral Hearing Requested?	Yes

### Application

Applicant:	Dairygold Co-Operative Society Ltd and TINE Ireland Ltd
Reg. No.:	P1103-01

See below for Objection details.

Attachments are displayed on the following page(s).

I object to the Proposed Determination of the EPA to grant Dairygold Tine an industrial emissions licence.

The reason I object is that the EPA's decision is in contravention of the Habitats Directive (Council Directive 92/43/EEC).

The Habitats Directive is a series of legislative measures that provide protection to sites across Europe known as Natura 2000 sites. The two sites concerned and adversely affected by the Proposed Determination of the EPA are the Great Island Channel Special Area of Conservation site code 001058 and the Cork Harbour Special Protected Area site code 004030.

**The overriding conservation objective of the Habitats Directive is the maintenance or improvement of habitats and the species listed in the descriptions of the protected areas.**

Hydrodynamic studies on flow from the end of the effluent discharge pipe by a number of independent professionals and scientists demonstrate that both these protected areas will be washed by the discharge from the Dairygold/Tine factory if the Proposed Determination is enacted. The study by NUIG states that the discharge will remain in the upper harbour for 60 days. The two above mentioned protected sites that are mandated to be protected under the Habitats Directive by the EPA, will receive an amplified dose of FOG if the discharge license is granted. The Ownenacurra River, which already classed as potentially eutrophic, receives 28% of the flow from the discharge pipe on the returning tide. At best the effluent will reduce significantly the local water quality and therefore degrade the habitats protected in the Great Island Channel SAC and the Cork Harbour SPA. Therefore the Proposed Determination to grant Dairygold/Tine an industrial emissions licence is contrary to the Habitats Directive because the pipeline if allowed to emit will degrade the habitats protected under it.

Most of the species mentioned are birds and their habitats, but also Polychaetes and Oligochaetes are listed as protected as they are an important food source for the protected bird species. To date no evidence as to the effect of FOG on these ecologically important food species has been presented by the EPA or by Dairygold/Tine. A study is clearly needed to assess the likely effect on the populations of these species by repeated and prolonged exposure to FOG effluent. Without such a study the EPA and Dairygold/Tine are neglecting their duty to follow the Habitats Directive.

In responding to issue 1 in the Inspectors Report dated 12<sup>th</sup> December 2019, the inspector lists the checks in place and efforts made to treat the effluent prior to its release into the environment. Despite this the proposed volume of effluent is so huge that the additional load of eutrophic nutrients and pollutants WILL downgrade the quality of water and therefore the habitat in the areas covered by the Habitats Directive. The industrial emissions licence should not be granted as it is in direct contravention of that directive.

In her response to Issue 1 the Inspector notes how the new Lower Harbour Sewage Scheme will greatly benefit the Great Island Channel. The inspector is clearly implying that the improvement in water brought about by this scheme leaves more room for the degradation of water quality brought about by the Dairygold/Tine discharge. This again is contrary to the Habitats Directive which states that the areas under the scheme are to be maintained or improved NOT improved and then re-polluted.

Simon Mould Bsc Zoology/Environmental Studies, MBA (mbs).

From the SAVE CORK HARBOUR CAMPAIGN