



Objection

Objector:	Mr Paul Murphy
Organisation Name:	Saleen & District Residents Association
Objector Address:	Church Cottage, East Ferry, Midleton, Co. Cork.
Objection Title:	Objection #OS005998 - 3rd party objection for Reg No:[P1103-01]
Objection Reference No.:	OS005998
Objection Received:	16 March 2020
Objector Type:	3rd Party
Oral Hearing Requested?	No

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).

Environmental Protection Agency

Po Box 3000

Johnstown Castle Estate,

Co. Wexford

16h March 2020

Submitted Online

Objection

by

Saleen and District Residents' Association re. Application Reg No P 1103-01

to the granting by the EPA

to Dairygold Co-operative Society Ltd and TINE Ltd. for an outfall license at Rathcoursey West, for the discharge of effluent from the Applicants' Cheese plant at Mogeely, Co Cork

Saleen and District Residents' Association is an elected, voluntary body representing the interests of residents in the areas of Saleen, Scartleigh Upper, Bawnard West, Rathcoursey East, Rathcoursey Village, Rathcoursey West, East Ferry, Garranekinnake and Jamesbrook. The Association works for the environmental protection and appropriate development of the areas that it serves.

The Association wish to appeal the decision taken by the EPA to grant the Industrial Emissions License to Dairygold and Tine Ltd.

We are fast approaching the deadline for appeals to be made in relation to the granting of a license to Dairygold and Tine Ltd to emit, into our harbour, very significant volumes of effluent waste from their Cheese making facility in Mogeely, Co. Cork. We appeal to those who are in authority to show common sense and prevent this environmental catastrophe from occurring.

There are alternatives.

We request that the EPA refuse to grant this license and advise Dairygold and Tine Ltd that before any license for industrial emissions can be granted all alternatives must be explored.

Saleen & District Residents Association is in favour of promoting growth in our local economy and creating employment for those who live in the area but not at the very high price of environmental damage. We are appealing the decision by the EPA to grant a license for the disposal of effluent waste into our harbour at Rathcoursey West, a harbour in which millions of euro has been invested over recent years to clean up our waters.

As residents, many of whom have resided in this area for their whole life, we are concerned about the environmental damage that will no doubt be done by disposal of effluent waste both in the method and volume proposed and at the location chosen in the above mentioned application.

Our objection to the granting of this license is based on facts,

- Rathcoursey West, the location of the outfall is at the northwest part of the inner section of Cork Harbour and is part of a Special Protection Area, Special Area of Conservation and Natural Habitat Area. We are not convinced that the monitoring, mitigation and preventative measures outlined in the application will enable the activity to operate without causing environmental pollution, as stated in the EPA Industrial Emissions License recommended determination.
- The functions of this part of Cork Harbour are outlined in the Cork Harbour Study undertaken by Cork County Council in 2011 as primarily recreational, environmental and aquacultural. Granting of a license which will allow the emission of up to 4,000 cubic metres of effluent waste into this part of the harbour does not support the view outlined by Cork County Council.
- The entire harbour area between Fota and Midleton is designated as a Ramsar site for wetland protection. It is very clear that emitting large volumes of effluent waste containing Suspended Solids, Ammonia, Fats, Oils and Grease along with other elements at temperatures of up to 25 degrees will be harmful to these wetlands.
- The proposed outfall contained in the application for industrial emissions is also adjacent to designated shellfish waters. Alternative options must be considered to prevent damage to this food source.
- The inclusion of a tidal holding tank in the application suggests that tidal influences are a prerequisite for effective distribution of the emissions. Unfortunately, tidal movements will transfer some of the emissions in the direction of the Saleen Creek/Rostellan Special Protection Area (SPA). The tidal flow in the initial part of the ebb tide from Rathcoursey is fast but slows very suddenly as it enters the wider expanse between Marloag Point and Gold Point. A reduction in water depth and a widening of the sea area will automatically result in deposition of elements contained in the emissions.
- A significant proportion of the emissions will remain in the conservation area close to the outfall pipe due to varying current movements and tidal eddies. These currents and eddies will extend the flushing period significantly and further highlights the need for considering alternative methods of emission.
- It has been established that the proposed location for emissions at Rathcoursey West, is, in effect, a mixing zone for both fresh and saline waters and that these exist in differing degrees depending on the ebb or flow of the tide and rainfall levels. Severe degrees of water disturbance is commonly seen in this location. This will also have the effect of extending the flushing period resulting in further environmental damage in the vicinity of the outfall.
- Significant amounts of money have been spent in recent years as part of an overall plan to improve water quality in Cork Harbour.
 - €112 million on the waste water treatment plant at Shanbally near Ringaskiddy.
 - Further investment is to be put in place in order to connect Cobh to the Shanbally Treatment Plant in the near future.
 - €12.3 million spent on upgrading the waste water treatment plant at Carrigtohill.
 - Irish Water plan to invest further in waste water treatment for the Whitegate and Aghada area on the east side of Cork Harbour.

Emitting up to 4,000 cubic metres of effluent waste per day from a cheese making facility will go a long way to negate the great work and expense that has been invested in the Cork Harbour area in recent years to improve water quality.

Given the above facts we cannot comprehend how our Environmental Protection Agency can grant a license which gives permission to Dairygold and Tine Ltd to add further effluent waste to our harbour waters. We are investing huge amounts of money in cleaning up these waters. Granting of this license is a retrograde step. In addition, it is inconceivable to understand how our EPA can consider adding this volume of effluent into a section of the harbour which is surrounded by areas of conservation and is so dependent on tidal flows to remove any pollution from a narrow inlet in the inner harbour and transport it without causing any environmental damage to the outer harbour and beyond.

The EPA in its report have concluded that it considers that the activity, *if managed, operated and controlled in accordance with the licence* will not result in the contravention of any relevant environmental quality standards or cause environmental pollution. This opinion is flawed as it assumes that there will be no contravention of quality standards. Track records of most industries worldwide prove otherwise.

The report also concludes that the EPA is satisfied, *on the basis of the information available*, that subject to compliance with the conditions of this licence any emissions from the activity will comply with and will not contravene any of the requirements of Section 83(5) of the Environmental Protection Agency Act 1992 as amended. This conclusion is also flawed as it is based only on information available. Our point of view is that not all information has been made available as all options for disposal of emissions have not been considered by the applicant.

The EPA decision concluded that the conditions of the licence and the mitigation measures proposed will significantly reduce the likelihood of accidental emissions occurring and limit the environmental consequences of an accidental emission should one occur. For the EPA to state that the measures adopted *will significantly reduce* the likelihood of accidental emissions is clearly indicating that the EPA accept that some accidental emissions could occur. This is not acceptable when you consider where the proposed outfall is located.

Saleen & District Residents Association is hereby appealing the decision taken by the EPA in granting this Industrial Emissions License. Our appeal is based on the facts outlined above and on our criticisms of the points raised by the EPA in deciding to grant the license.

This proposal is unreasonable, unnecessary and unsuitable.

We conclude with reminding you of our opening statement. We are asking our Environmental Protection Agency to show some common sense and to advise the applicant that they must consider other measures in which to handle the effluent in an environmentally friendly manner.

On behalf of the Saleen & District Residents Association

Paul Murphy

16th March 2020

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