

Submission

Submitter:	Ms. Michaela Kirrane
Submission Title:	Michaela Kirrane, IFI
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Application

Applicant:	Silver Hill Foods Unlimited Company
Reg. No.:	P0422-04

See below for Submission details.

Attachments are displayed on the following page(s).

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Iascach Intíre Éireann
Inland Fisheries Ireland

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Our Ref: MK/14.1

17th August, 2021

Re: IEC Licence Review – Silver Hill Foods
Location of Facility: Hillcrest, Emyvale, Co. Monaghan
Reg. No.: P0422-04

Dear Sir/Madam,

We refer to the above mentioned licence review application submitted by Silver Hill Foods for their facility at Hillcrest, Emyvale, Co. Monaghan.

Inland Fisheries Ireland (IFI) is a statutory agency responsible for inland fisheries in Ireland. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management and conservation of the inland fisheries resource.

IFI have the following observations to make in relation to the application:

Wastewater Treatment:

The applicant proposes to treat wastewaters arising from the processing of animal carcasses and by-products and increased carcass production capacity in the existing wastewater treatment plant (WWTP). While the applicant states that the WWTP has sufficient capacity to treat this effluent the documents do not appear to contain details to support this.

Wastewaters from the proposed processing of carcasses are likely to have a high organic and nutrient loading and are also likely to contain organic compounds (Section 4.1.1.1.b of the EPA BAT Guidance Note for the Disposal or Recycling of Animal Carcasses and Animal Waste).

It would be important to ensure that the existing wastewater treatment plant has sufficient capacity to receive and treat this wastewater. This information should be sought from the applicant.

Wastewater Disposal

The current licence (P0422-03) states that disposal options for treatment of the treated wastewater from the facility is to the Corlattalon Stream when there is a 1 in 15 dilution available and otherwise discharge is to the proposed drip irrigation network.

We note that the applicant proposes to discharge treated effluent to the wastewater treatment plant at Emyvale and/or to the proposed drip irrigation network. It is not particularly clear in the application documents which option is proposed. The applicant states that it will depend on operational factors but this is not elaborated on.



The current licence for the facility states that discharge to Emyvale Wastewater Treatment Plant (WWTP) is sanitary wastewater only from the facility. The EPA Inspector, in the assessment of the current licence (P0422-03), states that the discharge of treated effluent to Emyvale WWTP could not be licensed due to the lack of assimilative capacity at low flows in the Mountain Water River.

It is important to ensure that the potential impacts of an industrial discharge to Emyvale WWTP are fully explored to ensure that there are no negative impacts on the receiving water, the Mountain Water River,

Wastewater disposal - Drip irrigation

IFI has concerns about the proposal for drip irrigation. In our experience this method of disposal can be problematic as there are many factors influencing its success, most notably the weather and ground conditions. We have grave reservations about the suitability of the lands proposed due to their close proximity to a number of streams and lakes, i.e. Corlatallan Stream, Back Lough and Conns Lough.

We note the current IEC licence for the facility includes the requirement for a six month pilot drip irrigation project. It also states that drip irrigation must be carried out at minimum in accordance with the Good Agricultural Practice for the Protection of Waters Regulations 2017 (S.I. 605 of 2017).

It is important to ensure that the drip irrigation system is managed in a sustainable manner and that there are no negative impacts on ground or surface waters in accordance with the relevant legislation.

Abnormal situations and actions (Section 2.10 EIS Vol 2)

We note the applicant deals with a breakdown in the on-site wastewater treatment plant in this section of the EIS. The proposed action includes an assessment of storage capacity on site or remove partially treated effluent to an external wastewater treatment plant. IFI recommends seeking details of the proposed actions during the application stage to allow a full assessment of the proposals.

We note that the following potential abnormal situations have not been explored:

- Unable to utilize drip irrigation system (e.g. mechanical issues, adverse weather conditions)
- Unable to discharge to Emyvale WWTP.

We note in the document that the applicant refers to a condition set by Irish Water that two days effluent storage must be provided on site. Details of this storage do not appear to be contained in the documents.

Duck slurry and WWTP sludge management

We note the application contains information regarding the management of both duck slurry and WWTP sludge management from the facility.

We note both Duck slurry and WWTP sludge from the facility is to be landspread in accordance with the GAP regulations. We urge caution about the suitability of lands for landspreading given the nutrient value of both the slurry and sludge and the dry matter content of duck slurry, which necessitates careful management to ensure it does not have a negative impact on ground and surface waters.

Surface water management on site

We note the applicant proposes to reduce the number of surface water discharges to three on site. The current IEC licence lists four surface water discharge points on site.

During a site visit in 2020 IFI noted that the concrete yards at units 8 to 11 were in poor condition and the upgrading of these yards does not appear to be included in the documents. The surface water from this area is discharged to a watercourse, which flows into Conn's Lough and from there into Emy Lough.

It is important to ensure that surface water management does not have a negative impact on the aquatic habitat.



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The watercourses on, and in the vicinity of, the facility at Corlattalan, Emyvale are tributaries of the Ulster Blackwater River, the Mountain Water River and Emy Lough.

The Corlattalan Stream flows into the Ulster Blackwater at the townland of Killyearagh.

The lands to the south and west of the facility are in the catchment areas of Back Lough and Conns Lake, which in turn flow into the Mountain Water River and Emy Lough.

All of these watercourses contain valuable fisheries habitats and support a variety of fish species and other aquatic fauna.

The current WFD Ecological status of these watercourses is as follows:

- Mountain Water_040 - Poor
- Ulster Blackwater tributaries – Unassigned
- Emy Lough - Moderate.

It is imperative to ensure that the proposed development does not impact negatively on the current Ecological status, or impede the achievement of Good status, in all of these watercourses, in accordance with the Water Framework Directive.

The reason for the application to review of the current IEC licence is to include the processing of animal carcasses and to increase carcass production capacity at the facility. Both of these activities will produce significant volumes of wastewater. Treatment and disposal of this wastewater must be carried out in a sustainable manner to safeguard ground and surface waters. It is important to ensure that details are provided by the applicant to ensure these proposals are fully assessed at application stage.

Yours faithfully,

Michaela Kirrane

Michaela Kirrane

Senior Fisheries Environmental Officer, IFI Dublin

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