



Submission

Submitter:	Mr John Hayes
Organisation Name:	FCDRG
Submission Title:	P0040-03
Submission Reference No.:	S010484
Submission Received:	10 August 2022

Application

Applicant:	Anglo Beef Processors Ireland Unlimited Company
Reg. No.:	P0040-03

See below for Submission details.

Attachments are displayed on the following page(s).

To Whom It May Concern

I realise that there's a need for Rendering Plants and that they provide an essential service.

It also goes without saying that they also provide local employment.

Also, I'm aware that the ABP company supports local clubs and the community with funding etc.

However, this does not mean that we can turn a blind eye to the stench in our area from both the trucks and the emissions from the plant which affect not only the local population and schools nearby, but also residents and businesses in Waterford City and as far out as the Dunmore Road?

It's actually a pity that the EPA staff or the Inspector in charge of evaluating the licence are not living in the area so that they could witness what we have to put up with on a regular basis.

This has been the situation in our area for the last 21 years.

I'd like to draw the EPA's attention to the following article:

Ref: <https://www.irishtimes.com/news/goodman-plant-in-waterford-seeks-special-rendering-licence-1.266615>

This article was published back in 2001.

I've included the wording of the article below and inserted my own comments in 'red' as it's so relevant to the current licence application.

Goodman plant in Waterford seeks special rendering licence

Chris Dooley

Thu Jan 4 2001 - 00:00

A Goodman-owned meat plant in Waterford has applied to become the second in the State to be allowed to render specified risk materials (SRMs) from cattle, such as brains and spinal cords.

The application by Munster Proteins in Ferrybank is opposed by residents from a number of areas in the city and a second public meeting on the issue was held last night.

At present all SRMs, the parts of animals where BSE could occur, are taken to a plant in Co Cavan, Monery By-Products, for rendering into meat and bone-meal.

It is thought, however, that a single plant will no longer have the capacity to handle all such materials from next week when the BSE slaughter scheme brings a huge rise in the number of cattle being killed.

- The Ferrybank rendering plant 'Processes Category 1 Animal By Products'

Category 1 ABP is the highest risk to public health.

Category 1 ABP is:

"Any domestic or wild animal infected with a disease transmittable to humans or animals
ABP is contaminated with treatments from healthcare research

For example, an animal that is infected or suspected of being infected with transmissible spongiform encephalopathy (TSE), avian flu or bovine spongiform encephalopathy (BSE) poses a significant risk to public health.

For this reason, Category 1 ABP should be disposed of at an approved incineration or co-incineration site.”

An initial decision on the Munster Proteins application for a licence to process SRMs is expected from the Environmental Protection Agency within a week. If, as expected, it is granted, people will have three weeks to object.

- My understanding is that if this current licence renewal application is passed, people will have 28 days within which they can object. However, each objection will require a payment of €120.

Rendering has not been carried out at the plant for some time, but residents and local politicians claim that in the 1980s, there was a severe problem of smell emanating from the factory. Residents opposed to the application held a public meeting in Ferrybank on Tuesday, while another took place in Waterford city last night.

The South Eastern Health Board and Waterford Corporation have also written to the EPA, drawing attention to the problems which existed at the plant in the past and requesting that it be allowed to operate only under stringent conditions.

Mr Hilary Quinlan, the chairman of the board and a Fine Gael member of Waterford City Council, said people were very concerned given "the history of the plant".

The mayor of the city, Mr Davy Daniels, said the previous problems had existed for a long time and he was opposed to the application.

A spokesman for Munster Proteins said the company would work to ensure there wouldn't be a smell arising from the rendering operation, and in any case this would be dealt with by the EPA in considering the application.

- Yet, despite all of this evidence outlining the concerns of both residents and Councillors, the plant was given the go ahead? In hindsight, it must surely be obvious that this was a serious error of judgement. As I said earlier, we have now been lumbered with this situation and the local residents in Ferrybank and Waterford City are suffering on an ongoing basis as a result.

- Our area has been seriously affected by the stench from both the trucks travelling to the plant and the terrible odours emitted on a regular basis from the plant itself.

He also said there was no risk involved in the rendering of specified risk materials. These would arrive in sealed containers and be dealt with in accordance with whatever terms and conditions were laid down by the EPA.

- This is a very important point, as the trucks are ‘not sealed’, but only have a tarpaulin cover over the top. In my opinion whichever ‘authority’ is responsible for monitoring the trucks are clearly at fault here because the terms and conditions laid down are not in accordance.

The stench from the trucks passing through Ferrybank are disgusting throughout the year and even more so during the warm Summer months. The stench from the trucks is so bad that the plant sprays them and applies a ‘perfume’ to disguise the odour before they leave the facility. Even after that treatment there is a foul odour from them.

Another issue with the trucks is that because they are not properly ‘sealed’, juices often escape onto the

road and the stench can linger for a long time afterwards. Maggot infested body parts often fall out on the road and passing cars flatten the foul flesh on the road. These trucks also pass our local schools and students are exposed to the stench while walking home. Surely that the plant is approved for Category 1 processing, this can't be healthy?

I would like to refer now to the submission which was sent to the EPA by Mr. Paul Byrne of Kilkenny County Council on 21st of July 2022 following his site visit to the Anglo Beef Processors Ireland Unlimited Company plant in Ferrybank, where he states:

"The Environment Section of KCC have received a limited number of odour complaints in relation to the facility from time to time. These complaints would be forwarded to the EPA for investigation given that the facility is operated under an Industrial Emissions Licence. "

I'd like to explain that I have been working voluntarily in the community for over ten years. I'm a member of the Ferrybank Community Development Residents Group. In 2013 I set up the Ferrybank Community Newsletter Facebook group which has over 5,000 followers.

<https://www.facebook.com/TheFerrybankCommunityNewsletter>

One consistent complaint from residents over that time has been the stench from both the trucks and the plant.

I've always advised residents to make a complaint and to call the plant directly. However, it has been my experience that residents rarely take the time or make the required effort in order to properly log a call to the plant or follow it up by complaining to the EPA.

I guess people are busy with their lives/work and once they post their comment on the community Facebook page, they leave it at that.

In a lot of cases people simply don't know how the complaint process works etc.

The point I'm making is that just because not many 'official complaints' are recorded, that certainly does not mean that there isn't a serious issue in our area.

Here's an example of a recent complaint which was sent to our community Facebook page:

"One of the trucks going to the rendering plant lost some of its load by the Briar Rose earlier. It looked like big lumps of jelly on the road. Probably guts. Sorry, I wasn't able to take a photo because I was driving."

My understanding was that the gunge from the truck was cleaned up very quickly afterwards, so no photos were available and a complaint was not lodged.

Another point of frustration for residents is that when they complain about the trucks, they are told by the EPA that they are not responsible, just for the plant itself and that the trucks come under the authority of the Dept of Agriculture. In other cases, it seems that they are told by the Department of Agri that it's the local authority who are responsible. Ferrybank has sections under Waterford City & County Council, and still others under Kilkenny County Council, so you can see where it can become confusing for residents. There's also a deep-rooted pessimism in that residents feel that there's no point in complaining as nothing ever seems to improve.

Another reason for the lack of complaints is that a lot of parents are reluctant to do so as they feel that the ABP company supports the local club(s) etc and that their children benefit from that sponsorship by way of obtaining free training and games etc.

Regarding the 'Air Quality' in our area. This is a difficult issue for most people to evaluate scientifically. The

stench is the obvious topic mentioned, however there have been many studies carried out across the World in the vicinity of rendering plants and the results are disturbing to say the least. I've listed the results of one such study which was carried out in Southwest Greece below:

Odor nuisance and health risk assessment of VOC emissions from a rendering plant

Volatile organic compounds (VOCs) are generated from animal rendering facilities, some of which are malodorous, while others are considered hazardous. Odor annoyance potential, possible carcinogenic risks, and toxic effects due to VOC emissions from a rendering plant unit in Southwest Greece were evaluated for the general population residing in the near vicinity. Nine air samples were collected from the facilities of an integrated rendering plant and the surrounding area, over a 9-month period. Volatile compounds were absorbed onto solid sorbents containing Tenax TA/Sulficarb via active sampling and analyzed by thermal desorption-gas chromatography-mass spectrometry (TD-GC-MS). Sixty-three organic compounds, mainly volatile fatty acids, aldehydes, aromatic, and sulfur compounds, were quantified, in concentrations ranging from < 0.01 to 210 µg m⁻³. The compounds contributing most to odor nuisance were butanoic acid, dimethyl trisulfide, and octanal, exceeding their odor threshold by up to 24, 36, and 117 times, respectively. Cancer and non-cancer risks were determined by a probabilistic risk assessment method. The cumulative lifetime cancer risk for the general population was calculated to be on average 10 times higher than the acceptable risk (one-in-a-million). The cumulative mean hazard quotient was 3.3 and its 95th percentile was 4.0, indicating a high risk of adverse health effects. Control measures to prevent the generation of the VOCs responsible for both odor nuisance and potential adverse health effects should be adopted.

Ref:

https://www.researchgate.net/publication/344276432_Odor_nuisance_and_health_risk_assessment_of_VOC_emissions_from_a_rendering_plant

So, the obvious question is, are Air Quality samples being taken in Ferrybank and Waterford for the presence of VOC emissions? Which body or authority are charged with taking them? Are the samples being checked by an independent body/group, and where are the results displayed?

Having spoken with an expert in the workings of a thermal oxidizer and biofilter, our understanding is that they work 'fairly well' if maintained in an optimum condition, but that the regular maintenance can be costly.

Is the EPA in charge of monitoring the emissions, and are the results independently accessed and reported?

To be honest I wouldn't have much faith in 'Site Visits' as it seems that they need to be arranged prior to the visit, so that surely gives the plant plenty of time to get the plant looking spic and span? Are 'any' visits carried out without prior notice, and if so, given the seriousness of the situation for our area, why is that the case?

The ABP Plant Has Proposed A 60% Increase In Daily Intake!

I understand that the plant wants to increase the daily intake from 375 tons to 600 tons per day.

Given all of the points I've outlined above, how can this be possibly granted?

The roads leading to the plant are extremely narrow in parts. It's a miracle that a serious accident hasn't

occurred up to this point. They pass schools and businesses on a daily basis and the stench is a serious nuisance for our area.

it's also obvious that the rendering process is not best in class for the current intake as the residents of Ferrybank and Waterford can attest to.

The last two Kilkenny County Council development plans included a reference to the rendering plant in Ferrybank and said that the preferred option was that the plant be moved to a different area. One suggestion I'd put forward is that it be moved to Belview Port instead as it has an adequate sewage and water supply system there. Also, the trucks could bypass Ferrybank by way of the link road. Why is this plant left spew out it's stench in such a highly populated area which is so close to schools etc. It just doesn't make sense.

It's not as though the situation in Ferrybank is so unique.

Basic research would suggest that rendering plants are a nuisance close to any highly populated area.

Here are some examples:

Freshly roasted ass: What a rendering plant smells like:

<https://www.poisonedpets.com/freshly-roasted-ass-what-a-rendering-plant-smells-like/>

What's that smell? Homeowners say odor affecting quality of life

<https://eu.democratandchronicle.com/story/news/2014/08/30/penfiled-baker-commodities-rendering-smell/14830513/>

How To Solve The Safety Challenge At Rendering Plants

<https://www.mallory.com/roller/Blog/entry/maximize-safety-glove-efficiency>

Bodies and Biofuel: Regulating an Animal Rendering Plant in the Heart of San Francisco

<https://law.scu.edu/environmental-justice/bodies-and-biofuel-regulating-an-animal-rendering-plant-in-the-heart-of-silicon-valley/>

Excerpt from above article: *"Our findings suggest a need for **stronger enforcement of environmental regulations and more stringent emission limits**. We recommend agencies work with the community to develop guidelines for increased transparency and public involvement in enforcement, and fully implement environmental justice policies with specific, measurable goals and accountability mechanisms".*

Iowa town 'held hostage' by rendering plant's 'rotting flesh' stink

<https://eu.desmoinesregister.com/story/money/agriculture/2018/09/22/estherville-iowa-rotting-pig-flesh-stink-rendering-plant-odor-smell-central-bi-products-dnr-emmet/1335754002/>

Unable to sit in gardens because of the smell and daughter left in chronic pain - what life is like near animal-rendering facility

“It smells like rotten flesh”

<https://www.lincolnshirelive.co.uk/news/local-news/unable-sit-gardens-because-smell-5977692>

Complaints over JG Pears' 'smelly' Nottinghamshire factory

<https://www.bbc.com/news/uk-england-nottinghamshire-28673522>

Proposed Rule Meant to Curb Stink from Animal Rendering Plants

<https://la.streetsblog.org/2017/10/24/proposed-rule-meant-to-curb-stink-from-animal-rendering-plants/>

Perhaps the only ‘surprise’ from the articles shown above is that there doesn’t appear to be any communication between the affected communities Worldwide. Perhaps we need to look at that. The complaints follow a common theme. It would seem that individual plants can keep fobbing off any issues as they arise and seem to get away with the breaches on an ongoing basis.

Many of the residents in Ferrybank are relative newcomers to the area and there’s a total lack of awareness of the plant. One resident I spoke with recently said that she had noticed that the smell was really bad at times when she collected her child from school. When I mentioned the ABP Rendering plant she asked “what exactly do they do down there?”

I strongly object to the passing of the licence renewal.

The situation is totally acceptable and has been so for over twenty years.

Clear instructions need to be sent to residents so that they are aware of the proper complaint process. (As in, calls to the plant, EPA, Dept Of Agriculture and/or ‘which’ Local Authority?)

Even when you send in a complaint, it seems it achieves little or nothing in way of change, which can be very frustrating. (I called the plant on the 20th of June last and sent in a complaint to the EPA. I still haven’t received feedback or a reason for the stench from the plant, despite being told by the plant manager that they would do so. I’ve inserted an image of the complaint below for reference). At other times, I was told that it was ‘only steam’ coming out of the chimney stack. I made the point that if it was ‘only steam’, then way was it that it was generally only released when the wind direction was favourable? If it was only steam, surely it would be okay to leave it out at any time of the day or night? I received no reply to that question.

At the very least, the current plant needs to be fully evaluated as it’s clearly not fit for purpose.

We are unfortunate that the licence was awarded back in 2001. It’s clear that the plant has never been a ‘stench free’ production process and that includes the trucks. (Again, I’m referring to the fact that they are not, and never have been ‘sealed’.)

It’s also worth noting that the population of Ferrybank will be increasing rapidly in the coming years as many new housing estates are planned for the area.

In addition, we expect Dunnes Stores to open in the Ferrybank Shopping Centre. (Hopefully by Christmas).

Shoppers to the area will be treated to the 'putrid' odours while visiting. This is not in the best interest of our area or new retail businesses locating here.

The 'nuisance' factor of having this rendering plant in our area will be multiplied many times over. Particularly should the 60% increase in production be sanctioned by the EPA without the current process being properly examined and extremely stringent 'independently monitored' conditions applied.

Complaint referenced above:

Odour Issue Experienced:

Both

Location:

Abbeylands Estate, Ferrybank

Detail of Complaint:

I was visiting a friend in the Abbeylands Estate yesterday evening. I go there most evenings as I bring their dog walk.

The stench from the ABP Rendering Plant was very strong. The lady living there said that the odour was so bad she had to take in her washing and had closed the vents in the house as the odour was in the house as well.

She maintained that the stench had been there at least an hour and a half. Perhaps 2 hours before I arrived.

It only went away at 8:20pm

She rang the factory, but there was only a security guard on duty so he asked if we could call back the next day (Tuesday).

I rang the factory at 11:16am this morning (Tuesday 19/07/2022) and spoke with Colm the production manager. He said that it was hard to understand why there would be a stench earlier than 7:00pm as they only started the production then.

He also said that "it may have been one of the trucks traveling to the factory as you know that in this warm weather can be a strong smell."

I said that a truck will usually give a strong smell while passing and perhaps for a short while after that, but that was a persistent stench.

He said that he'd check to see if there was a reason for it and call me back.

I didn't receive a call back as yet.

This is not something unusual to be honest. We have been putting up with this stench for years.

We are trying to manage our day to day lives, jobs, families and businesses. People don't have the time or the means in order to keep on top of the issues caused by this plant. This is where we need the EPA and other state bodies to provide the support and proper monitoring of the rendering plant so that we can enjoy clean fresh air and a stench free environment.

