



### Submission

Submitter:	Mr John Fitzgerald
Submission Title:	ABP Submission 2022
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### 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).

Anglo Beef Processors Ireland Unlimited Company

Register Number P0040-03

26/08/2022

The following is a submission on the application for the licence renewal by Anglo Beef Processors Ireland Unlimited Company, for the ABP Rendering Plant at Christendom Ferrybank Waterford.

In the time this company has been in operation in this location, their detrimental impact on local air quality, arising from their rendering activity, has been sickening, unbearable and unjust on those effected. The residents effected by this ever-present, nauseous smell, are literally hostages in their own houses, and their quality of life is being severely blighted by this rendering operation in their neighbourhood.

As someone who commutes regularly by bicycle in the area, the strong putrid smell is extremely nauseous and uncomfortable when passing within the drift <https://www.latimes.com/local/lanow/la-me-ln-rendering-plants-20171103-story.html> reach of the premises and lingers for the course of the day. The inbound trucks transporting the offal to the plant, also leave an unbearable, nauseous stench in their wake.

It has been confirmed that the ABP operation is seeking to expand its activity by sixty per cent. This is frightening, given the detrimental impact the current operation is already having on local air quality. This also means even greater truck movements, increased noxious and nauseous smells, than the present unbearable stench. It has been stated by the operators that trucks containing offal, are sealed. This is not the case. They are covered in roll back tarpaulin and the lingering smell left in their wake, as stated above, is unbearable and sickening to members of the public.

Waterford already had the worst air quality of any Irish city in 2020 and 2021 according to a report by the EU Environmental watchdog, The European Environment Agency. Adding more pollution to that unhealthy scenario, is unacceptable.

<https://www.wlrfm.com/news/air-quality-report-eu-261068>

Everyone has the right to a healthy environment. This right has been ratified this year (July 28, 2022), by the United General Assembly. "The resolution will help reduce environmental injustices, close protection gaps and empower people, especially those that are in vulnerable situations, including environmental human rights defenders, children, youth, women and indigenous peoples."

<https://news.un.org/en/story/2022/07/1123482>

The local people effected by this ABP operation have had their right to a clean and healthy environment, taken away from them for years and now that right has to be upheld by the EPA. Rendering plant odours are only one of a slew of environmental ills that impair health and quality of life of communities around the world.

<https://www.irishtimes.com/news/science/dairy-and-livestock-farms-in-ireland-can-be-compared-to-oil-production-1.4343974>

<https://www.latimes.com/local/lanow/la-me-ln-rendering-plants-20171103-story.html>

As to whether odours can cause health effects, the American Thoracic Society, a scientific society that focuses on respiratory and critical care medicine, published its official guidelines as to what constitutes an adverse health effects, updated these guidelines in 1999 and 2004. The statement acknowledges that there are graduations in the degree of effects and also differentiate between an effect that is adverse from an effect that is merely a physiological response. The ATS statement indicates that air pollution exposures which interfere with the quality of life can be considered adverse. Thus odour-related annoyance should be considered adverse, even if nausea or headache or other symptoms are not present. In the ATS guidelines, odours are clearly listed as an adverse respiratory health effect. Unpleasant odours have long been considered as warning signs of potential health risks.

More recently, there have been public health concerns that odour sensations themselves, or perhaps the agents responsible for odour, may in fact cause health effects. Such odours often elicit complaints of respiratory irritation, headache, nausea and other adverse symptoms. While the mechanism for the production of these effects is not known, these effects have been noted at concentrations of substances that produce unpleasant odours. Postulated mechanisms include neurological changes in sensory nerves that could influence symptom production in the absence of other toxicological effects.

“What Constitutes an Adverse Health Effect of Air Pollution?”, American Thoracic Society, 1999,

<http://www.thoracic.org/statements/resources/archive/airpollution1-9.pdf> “Odour Impact - Odour Release, Dispersion and Influence on Human Well-Being with Specific Focus on Animal Production”, Nimmermark, 2004

It is quite apparent that the abatement measures in this plant are not sufficient to protect public health and deal with the continuous and pervasive presence of odour nuisance.