



### Submission

Submitter:	Mr donagh cronin
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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).

To the Environmental Protection Agency

I wish to record my objection to the proposed expansion of the ABP Waterford Proteins plant currently up for review to the relevant authorities, namely the EPA but surely also on the radar of both Kilkenny and Waterford local authorities. Indeed the 2005 Kilkenny county plans included an aspiration to relocate the meat industry from its current location to a more suitable one. What happened to this obvious solution? Why and by whom was it removed from Kilkenny's next set of county plans?

I also wish to point out the obvious opportunity to move this operation once and for all out of our city environs. This is an Unlimited Company looking to expand capacity. Few companies are so secure financially that they take themselves out of protection. If ABP wish to expand by 60% let them do so on a purpose built site away from the city environs and with the latest technology and connectivity to already existing waste water systems so there is finally a solution that we were all assured of by the EPA over 20 years ago when the current license was acquired. Prior to the current licence being awarded, National Proteins was shut down for a very good reason after years of problems with the very same odours. The same owners applied for a new license promising new technology to burn off the emissions at very high temperatures. We were assured at the time that the newly formed EPA would strictly monitor all odours/emissions/waste/leakage/complaints etc etc. We were even told this rendering technology was being used in city centres in Europe and there were no problems. This simply has not been the case. It has been over 20 years of light touch regulation and now the EPA are expecting the citizens of Waterford to just trust them again, that this time will be different? No thanks. Light touch regulation versus big business has been a disaster in every sector in every country.

The large blue holding tanks on the riverbank are also a huge source of odours but seem to be beyond monitoring or license? What happens when these are full? The infrastructure is creaking and regularly results in sewage pipes bursting between the rendering plant in question (that wishes to expand by 60%) and these blue holding tanks. This is not regular sewage. This is the most toxic by-product of a rendering system. Who monitors this? Is anything being pumped into the river? If so who monitors what is in this sludge? The Estuary is currently being massively polluted and the EPA don't know the source. And yet you are asking our opinion on more than doubling the throughput of a major producer of toxic waste located on the very river that is biologically being decimated as we speak. It beggars belief.

Where will the toxic materials be coming from to drive this business? Ireland or abroad? If it's the latter then how could the EPA possibly countenance importing environmentally dangerous materials for disposal in this country for the personal gain of one individual?

One final question for the EPA. There is a 2018 application for the addition of the buildings to house this new expansion. Have these been built? Is this already a fait accompli? If it proves to be already decided then these submissions are a sham and therefore a scandal.

We are an agricultural country and we punch way above our weight on the international stage with the likes of Kerry Group, Total Produce, Glanbia, Dawn Meats and the Goodman Group to name a few obvious ones. We need abattoirs and thus rendering plants. We also need them to be compliant and monitored. These companies operate in billions. They can afford to be compliant and using the most up to date technologies. Indeed these technologies pay for themselves. There is no excuse.

Do your job.