



Submission

Submitter:	Ms. Bernadine Scanlan
Submission Title:	HSE Submission
Submission Reference No.:	S011236
Submission Received:	14 July 2023

Application

Applicant:	Mr Michael Monagle
Reg. No.:	P0446-03

See below for Submission details.

Attachments are displayed on the following page(s).



Environmental Health Service,
Blackwater House,
Mallow Business Park,
Mallow,
Co. Cork
Phone: 022 58705

14th July 2023

EPA Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford
licensing@epa.ie

Re: Industrial Emissions Licence No: P0446-03

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the scoping of the above proposal.

The following HSE departments were notified of the consultation request for this development on the 25th May 2023.

- HSE South Emergency Management – David O’Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O’ Moore
- CHO – Michael Fitzgerald

If you have any queries regarding this report the contact is Bernadine Scanlon, Principal Environmental Health Officer, North Cork at bernadine.scanlan@hse.ie

Yours sincerely,

A handwritten signature in blue ink that reads "Seamus Kenny".

pp Bernadine Scanlan
Principal Environmental Health Officer

HSE SUBMISSION REPORT

Environmental Health Service Consultation Report

as a Statutory Consultee (Planning and Development Acts 2000, & Regs made thereunder)

Date:	14 th July 2023
Our Reference:	3196
Report To:	Environmental Licensing Programme Office of Environmental Sustainability Environmental Protection Agency Johnstown Castle Estate Co. Wexford
EPA Reference:	P0446-03
Type of Consultation:	Industrial Emissions (Intensive Agriculture Poultry and Pigs)
Applicant:	Michael Monagle, Annakisha North, Doneraile, Co. Cork
Nature of Activity:	Activity Class 6.2(a) and (b) Class 6.2 (a) The rearing of pigs in an installation where the capacity exceeds 750 places for sows Class 6.2 (b) The rearing of pigs in an installation where the capacity exceeds 2,000 places for production of pigs which are over 30kg.
Location:	Annakisha North, Doneraile, Co. Cork

General Comment

Details of the application were circulated to HSE stakeholders on the 25th May 2023

- HSE South Emergency Management – David O’Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O’ Moore
- CHO – Michael Fitzgerald

Introduction

The licence review applied for relates to the rearing of pigs on site at Annakisha, Doneraile, Co. Cork. The existing licence P-0446-01 has been in place since 1999. A previous licence review under P-0446-02 of March 2021 was withdrawn.

The current licence review is necessary due to additional stock numbers and amended site boundary relating to conditional permission granted for the construction of fattening house and associated feed mixing room and pig walkway under Planning Reference Number 14/5815. A review is required as the development “will bring the capacity of this farm in excess of that for which a licence was granted (P0446-01) from the EPA on the 12/01/1999” (pg4 of the Non-Technical Summary).

It is also note that the EPA conducted a site visit under a compliance investigation on the 15th March 2023 and found the “operation of unauthorised houses and overstocking in excess of EPA licence limits”. The site visit report stated the site was “found to be continually using unauthorised houses”... and “instruction to de-stock was not complied with”.

The facility is described in the Non-Technical Summary (NTS) of the application as a farm where the production process will be similar to other pig units throughout Ireland and is located in an agricultural area. The installation comprises animal houses, manure collection and storage tanks, ancillary structures and equipment necessary for the accommodation, management and husbandry of the animals and the administration of the enterprise. It is designed and installed for the purpose of breeding and rearing pigs for sale off of the site for processing into human food by the pork/bacon industry.

Site Location

The facility is located in the townland of Annakisha 3.7km south of Doneraile, 6.7km north east of Mallow and 1.5km west of Annakisha church.

Water (Ground water and Surface water)

The NTS indicates that potable water is sourced from 2 existing onsite wells (AAW1 and AAW5) and a new additional well (AAW2).

Stormwater

Storm water from roofs and clean yards are described in the NTS as being discharged to field drainage via a storm water collection system. Discharge points will be checked, inspected and monitored and that no soiled water or effluent will be discharged to any watercourse or groundwater.

The Environmental Health Service (EHS) recommends that storm water from roofs and clean yards is collected/harvested in attenuation tanks for example, to maximise water efficiency and limit potential discharges that may cause flooding in the local area. This is in the context of climate change where the frequency and intensity of precipitation is expected to increase as global temperatures increase.

Slurry (also partly covered under waste)

The NTS indicates that slurry produced at the facility is utilised as a valuable fertiliser for farmland. It is said to be distributed to local farmers for use on their farmland.

The previous licence sets conditions, some of which relate to the size of slurry storage capacity (six months minimum), that the storage facilities are built to Dept. of Agriculture, Food and the Marine standards and that the storage facilities are bunded to 110% the size of the storage facility.

The EHS recommends that access to slurry for use in landspreading by local farmers is restricted to times of the year when the landscape can safely absorb slurry in order to protect surface and ground water sources and minimise odours to sensitive receptors. There may be a cumulative effect at play if other large sources of slurry in the locality are being utilised at the same times.

Noise

It was difficult from the documentation reviewed to establish the location of potential noise sensitive receptors/locations. However, a visit to the locality by Environmental Health Officer Ms. Muireann Chambers on July 6th 2023 indicated that circa 10 domestic dwellings are present in the area surrounding the pig farm. Her observations indicated the site is well screened with established trees and foliage. Condition 6 under licence P-0446-01 set noise levels at the boundary of the facility at 55 dB(A) for the daytime and 45 dB(A) for night-time.

The EHS recommends that noise levels are re-assessed at/near potential noise sensitive locations and mitigation measures put in place, if necessary, to meet permissible noise limits.

**Waste (including general waste, domestic waste, animal tissue and veterinary waste)
Overlaps with pest/vector control**

The principles of the waste hierarchy should be applied to the facility, in terms of preventing waste in the first place, minimizing/reducing the generation of waste, reusing, recycling and the final option of disposal. The facility should also take account of the Circular Economy and Miscellaneous Provisions Act 2022, and work towards the avoidance of single use items and prevent food waste.

The type of lighting utilised on site could be given special consideration to limit waste linked to the use of fluorescent lighting tubes.

The EHS recommends proper segregation of waste into different waste streams for appropriate handling and management by appropriately authorised waste contractors. Animal tissues or carcasses should be stored and transported in sealed leakproof containers

Pest/Vector Control

Condition 2 under the licence P0446-01 for management of the facility states “the licensee shall maintain and continuous vermin control at the site”. Vermin control should be extended to other pests and potential vectors of disease such as flies and possibly mosquitoes.

The EHS recommends an Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of control measures to vectors in all stages of their life cycle.

Emissions to Air and Odour

As referenced below in the context of climate change the source of energy used by the facility may impact on the cumulative impact of climate change on health as well as produce pollutants potentially harmful to human health, if those sources of energy are fossil fuel based. Indications under the previous licence are that there are no emissions to air of environmental significance.

Odour is an issue of potential significance in this type of facility. The local Environmental Health office in north Cork is not aware of any complaints regarding odour up to the point of the area visit undertaken by Ms. Muireann Chambers, EHO on July 6th 2023.

The EHS recommends that odour abatement is carried out on site to limit potential impact on odour sensitive locations.

Climate Action

The Irish Government declared a climate and biodiversity emergency in 2019 and the Climate Action Plan 2023 sets out a roadmap to halve emissions by 2030 and for Ireland to be a net zero economy by 2050. It is incumbent on every energy consumer to reduce energy consumption and green house gas emissions to protect human health locally and globally.

The EHS recommends the applicant to use renewable energy technology if available, to power the facility and to continuously investigate and implement any proven technology/initiative which reduces the production of green house gases. Roof space for example could be utilised to harvest solar energy and deliver energy efficiency.

Kind regards,

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)

HSE South Emergency Management Consultation Report			
Report to	Bernadine Scanlon PEHO, North Cork	Date	26th May, 2023
Type of consultation: EIS X Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR X EPA <input type="checkbox"/>			
Other (please specify) Industrial Emissions (IE)			
Authority	EPA / HSE		
Authority's Reference No.	P0446-03 EHS 3196		
EM Reference Number	EMENV 165		
Applicant	Mr. Michael Monagle, Annakisha North, Doneraile, Cork P541 EY43		
Proposal	The rearing of pigs in an installation where the capacity exceeds – (a) 750 places for sows at Doneraile, Cork P51 EY43		

HSE South Emergency Management Observations:

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the `ETHANE` format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e.; a green sign with a yellow border and white lettering citing the abbreviation RVP
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the `off-site` impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*.
<https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or maryanne.horgan@hse.ie