



Submission

Submitter:	Pat Moran
Submission Title:	Rec'd by email
Submission Reference No.:	S011247
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Application

Applicant:	Kilkenny Cheese Limited
Reg. No.:	P1180-01

See below for Submission details.

Attachments are displayed on the following page(s).

Pat Moran

23/07/23

Re: – Kilkenny Cheese – PO1180-01

Dear Sir/ Madam

When granting the connection for Kilkenny Cheese to the sewer discharge pipe along with Glanbia's (now known as Tirlan) previous connection to the Urban Waste Water Treatment Plant (UWWTP) Irish Water failed to address or take into consideration the Storm Water overflow facility that a UWWTP and their discharge pipes has and that an industrial emissions Licence does not have and should not have by allowing this connection the developments on the entire Glanbia and Kilkenny cheese sites has potentially got that facility.

"The proposed development will be located within the Kilkenny Cheese Ltd site and the Glanbia Belview site".

A combined sites development which potentially could have crossover/diversion of the raw material between both plants, but with no combined effluent assessment report in terms of the two EPA Licenses and the UWWTP Licence.

Following Glanbia's connection to the UWWTP has Irish Water had cause to use the overflow facility either at the plant or at one of the other overflow pipes in the system EPA Site Visit Report SV15757 dated **05/07/2018**. "Is the Plant overloaded – YES". Then four years later EPA Site Visit Report SV23797 dated **28/09/2022**. "Organically overloaded" at present is being operated in a "**Shock Load**" state and that 50% of the load to the plant is now coming from just one local food industry. There is no mention of the issues referred to in the EPA site visit reports in the 2020 annual environmental report?

Can the UWWTP collecting system and discharge pipe still come under the UWWTP classification when the discharge pipe is servicing the two developments on the combined sites.

Should the overflow be withdrawn from the UWWTP and its collecting system?

Page 21 Appropriate Assessment – Stage2 – Natura Impact Statement - 4.3 Conservation Objectives -

In terms of Waterford Estuary – SAC these objectives have not and are not being met. Waterford Estuary – SAC has previously failed and is failing to meet the environmental

quality standards laid down in the legislation of the European Union and Irish legislation.

EPA water quality in Ireland 2016 – 2021 – Conclusion (eg Phytoplankton and Fish)

Transitional waters in less than good status – Barrow Suir and Nore.

The **New Normal** for Waterford estuary as I referred to on the 24/03/23. Whatever that is and wherever it is coming from “**Foam**” plus Oil like slick that appears to turn into “**Foam**” later traversing the estuary constantly and was on display significantly on Saturday 22/07/23 and Sunday 23/07/23.

Otters-eels

The absence of eels or any other food source that should inhabit the streams and rivers should be seen as a significant issue when it comes to otters and not having otters present . Eels now a critically endangered species would have been in every waterway in Ireland. Waterford estuary would have been renowned for eels and eel fishing . The area where the UWWTP discharges that Kilkenny cheese proposes to join discharges directly into an area of Waterford estuary where eels would historically have congregated both big and small. Eels written out of the history of the Waterford estuary and the streams that join it.

Until there are credible answers along with full disclosure there should be no new Licence granted.

Yours sincerely

Pat Moran