



Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE
Submission Title:	PO696-03
Submission Reference No.:	S011301
Submission Received:	11 September 2023

Application

Applicant:	Messrs Jim and Mark Wright T/A JMW Farms
Reg. No.:	P0696-03

See below for Submission details.

Attachments are displayed on the following page(s).

HSE SUBMISSION REPORT

Environmental Health Service Consultation Report

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

Date:	12 th September 2023
Our Reference:	3329
Report To:	Environmental Licensing Programme Office of Environmental Sustainability Environmental Protection Agency Johnstown Castle Estate Co. Wexford
EPA Reference:	P0696-03
Type of Consultation:	Industrial Emissions (Intensive Agriculture Poultry and Pigs)
Applicant:	James and Mark Wright T/A JMW Farms
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
Location:	Crosses, Monaghan, Co. Monaghan

General Comment

Details of the application were circulated to HSE stakeholders on the 1st August 2023

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O'Moore
- CHO –Dermot Monaghan

Introduction

The licence review applied for relates to the rearing of pigs on an existing site at Crosses, Monaghan, Co. Monaghan. The reasons for the licence review are stated in the application form as an increase in capacity and site related changes. The previous licence EPA Ref P0696-02 has been in place since February 2011.

Full planning permission was granted by Monaghan County Council under Planning References 17/587 – 07/993. Planning Reference 17/587 relates to for one pig house and ancillary facilities with seven planning conditions. The pig house and ancillary facilities have since been built. The unit employees five people and a maximum number of 1,600 sows are to be housed at the installation.

Site Location

The facility is located at Crosses, Monaghan, Co. Monaghan

Water/Storm water

The NTS indicates that clean surface water will be directed to a local water course and that dirty surface water will be directed to manure storage tanks.

The Environmental Health Service (EHS) recommends that clean water from roofs and 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.

Pig Manure (including dirty surface water)

The NTS describes pig manure as the main secondary product produced on the farm which is made available to customer farmers for use as an organic fertiliser on their lands.

The EHS recommends that the storage facilities for pig manure are bunded to 110% of the storage facility in line with Dept. of Agriculture, Food and Marine standards.

The EHS recommends that access to pig manure for use in landspreading by local farmers is restricted to times of the year when the landscape can safely absorb such manure 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 and Odour

The NTS describes noise mitigation measures such as restricting deliveries to the normal daily work routine where possible/practical and the use of a computerised feeding system. Odour is mitigated through a strict washing routine to prevent the build up of odour within the houses.

Local observations indicate that the location is rural where potential sensitive receptors are few in number.

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

Waste (including general waste, domestic/canteen 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 the generation of waste in the first place, minimizing/reducing the volume 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 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

Reference could not be found in the NTS to the issue of Pest/Vector Control.

On a day to day basis the facility should operate a vector control plan to limit/eliminate the potential proliferation of disease vectors such as rodents, flies, mosquitoes and other potential vectors.

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

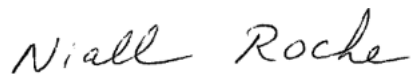
management practices, such as the management of animal tissues and carcasses plus the application of measures to control vectors in all stages of their life cycle.

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

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

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

**Environmental Health Service
The Arcade
Main Street
Cavan
H12 N251**

**Tel: +353 (0) 49-437 3418
Fax: +353 (0) 49-437 3427**

**Ref: CO'D/FS
Date: 28/09/23**

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

12th September 2023

Re: Industrial Emissions Licence No: P0696-03

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 1st August 2023.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O'Moore
- CHO –Dermot Monaghan

If you have any queries regarding this report the contact is Claire O'Dwyer, Principal Environmental Health Officer, Monaghan at claire.odwyer@hse.ie

Yours sincerely,



Claire O'Dwyer
Principal Environmental Health Officer