

Submission

Submitter:	Ms. Mariesa Rushe
Submission Title:	Rec'd by email
Submission Reference No.:	S011344
Submission Received:	23 October 2023

Application

Applicant:	Crayvall Egg Production Limited
Reg. No.:	P1120-02

See below for Submission details.

Attachments are displayed on the following page(s).



Environmental Health Services

HSE Dublin North East
Unit 1.02, First Floor,
Southgate, Dublin Road,
Drogheda, Co. Louth.
A92 DK2T

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

Tel: +353 (0) 41 2152011
Fax: +353 (0) 41 2152091

23rd October 2023

Re: Industrial Emissions Licence No: P1120-02

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the licence review referred to above.

The following HSE departments were notified of the consultation request for this development on the 12th September 2023.

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

If you have any queries regarding this report the contact is Marie McCaffrey, Principal Environmental Health Officer, Louth at marie.mccaffrey@hse.ie

Yours sincerely,

Marie McCaffrey
Principal Environmental Health Officer

**Environmental Health Services**

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HSE SUBMISSION REPORT**National Environmental Health Service Consultation Report**

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

Date: 23rd October 2023

Our Reference: 3424

Report To: Environmental Licensing Programme Office of Environmental Sustainability Environmental Protection Agency Johnstown Castle Estate Co. Wexford

EPA Reference: P1120-02

Type of Consultation: Industrial Emissions (Intensive Agriculture – Rearing of poultry)

Applicant: Crayvall Egg Production Limited, Carrickbaggot, Grangebellew, Co. Louth

Nature of Activity: Activity Class 6.1 (a)

Class 6.1 (a) Intensive Agriculture: The rearing of poultry in installations where the capacity exceeds 40,000 places.

Location: Carrickbaggot, Grangebellew, Co. Louth

General Comment

Details of the application were circulated to HSE stakeholders on the 12th September 2023

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

Introduction

The licence review applied for relates to the rearing of poultry at Carrickbaggot, Grangebellew, Co. Louth. There is an existing egg production facility at the location. The applicant is planning to increase the size of the flock being managed at the site from the existing size of 60,000 birds to 124,000 birds in total. The applicant indicates in the Non-Technical Summary under the licence review that planning permission has been applied for an additional poultry house to accommodate the additional 64,000 birds.

At the time of writing this submission Louth County Council have refused permission on 6th October 2023 for the proposed development under Planning Reference 23/60288 on a number of grounds

"Inadequate information in relation to

- Landspreading Areas and Biosecurity
- Alternative Sites
- Noise
- Dust
- Climate Change
- Ground Water
- Surface Water and
- Biodiversity"

To further inform this submission the location of the proposed site was visited by Ms. Mariesa Rushe, Environmental Health Officer on Thursday 12th October 2023

Site Location

The facility is located at Carrickbaggot, Grangebellew, Co. Louth

The following observations are structured around issues of most relevance to the protection of public health in the context of the emissions licence review.

Infrastructure

At present the infrastructure required to manage a hugely expanded flock from 60,000 birds to 124,000 birds does not exist. Planning permission has been sought from Louth County Council but as the introduction here explains the current application for planning permission (Planning Reference No: 23/60288) has been refused.

The Environmental Health Service (EHS) recommends that a licence is only granted after the required infrastructure is in place that meets the conditions of planning if and when planning permission is achieved.

Poultry Manure

The Non-Technical Summary (NTS) that forms a part of the licence application indicates that the poultry manure produced on site can be used as an organic fertiliser, thereby replacing inorganic chemical fertiliser currently used on agricultural land.

The EHS recommends that access to poultry 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.

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

Noise and Odour

The NTS provides an outline of mitigation measures that will be taken such as the restriction of deliveries to normal working hours and the use of automated feeding and ventilation systems.

A site visit to the area was conducted by Ms. Mariesa Rushe, EHO on the 12th October 2023. The EHS are not aware of any potential sensitive receptors near the proposed facility and to date the EHS office has not received any complaints from sensitive receptors with regard to noise and/or odour.

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

Water (clean and dirty surface water)

The NTS makes brief reference to the fact that there will separate clean and dirty water systems though no reference is made in the NTS to the source of “clean” water on site. In the context of dirty water reference is made to dry cleaning of poultry houses thereby reducing the need for washing water. The NTS does not indicate where clean surface water discharges go to after collecting by drains around the existing houses.

Local observations indicate the presence of a stream at the entrance to the site.

The EHS recommends the maximum use of rain water harvesting from the roofs of the poultry houses to limit demand on existing water sources, be they public or private. Rainwater harvesting may also serve to address future dry spell/drought conditions in the context of our changing climate.

The EHS recommends that potential emissions (clean surface water emissions for example) take account of the stream at the site entrance and discharges if any, meet Emission Limit Values.

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 both 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.

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

Reference in the NTS is made to certain types of waste namely animal tissue waste, general domestic waste and fluorescent tubes as main sources of emissions.

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.

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. Alternatives to fluorescent tubes such as LED tubes should be explored to deliver greater energy efficiency. Some forms of waste may suitable for the generating of bio energy.

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.

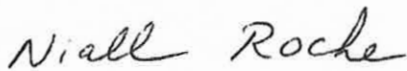
The EHS recommends an Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of measures to control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

Exceptional Emissions

The issue of potential exceptional emissions did not arise in the NTS. Exceptional emissions may arise on occasion if for example the flock was afflicted by an infectious disease and a cull had to take place on site.

The EHS suggests such potential emissions are considered in the context of Disaster Risk Reduction and contingency plans and procedures are put in place to limit potential emissions to the local environment. The EHS suggests that mechanisms are put in place to enable communities provide feedback (including a formal complaints mechanism) to and receive communications from the facility's operator should any incident arise that may impact on human health.

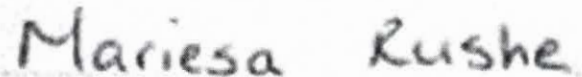
Kind regards,



Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

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



Mariesa Rushe
Environmental Health Officer