



Objection

Objector:	Joe Murray
Objector Address:	Ballyglasson, Edgeworthstown, Longford, .
Objection Title:	Objection
Objection Reference No.:	OS011428
Objection Received:	14 December 2023
Objector Type:	3rd Party
Oral Hearing Requested?	No

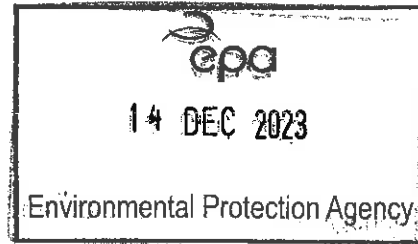
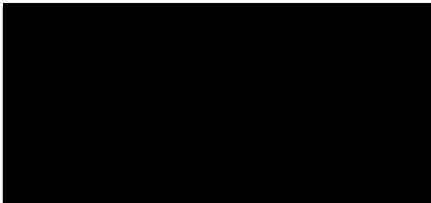
Application

Applicant:	DDS BRADY FARMS LIMITED
Reg. No.:	P0408-02

See below for Objection details.

Attachments are displayed on the following page(s).

BEAG (Ballyglasson Environmental Action Group)



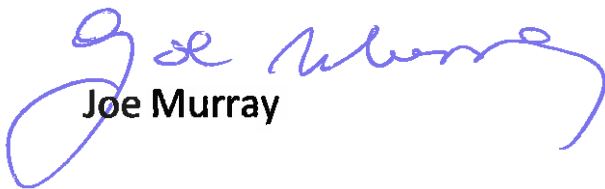
11/12/2023

To whom it Concerns,

Please find enclosed BEAG's response to the Proposed Determination regarding an Industrial Emissions Licence for DDS Farms Limited. (Licence Register Number P0408 – 02.)

Please acknowledge receipt to 

Yours sincerely,


Joe Murray

Ballyglasson Environmental Action Group (BEAG)

Ballyglasson, Edgeworthstown, County Longford.

Proposed Determination regarding the Issuing of an Industrial Licence to 'Carrickboy Farms'

Licence Number P0408-02

General Observations

BEAG is surprised and disappointed that no one involved in our group was contacted to outline our experience or to offer an opinion based on our direct experience of the facility, before the issuing of the proposed licence. Nobody knows more about the impact of this dirty industry on the local environment and on peoples' lives than those living under its long and toxic shadow. We believe that the failure to consult those most affected is a missed opportunity on the part of the EPA.

In the proposed licence, there is considerable discussion regarding the impact of the piggery on European Sites and Natural Habitats, which is extremely important, but the failure to address its impact on *people* in the local community is a major omission.

Over the years, the area around this facility has been degraded from a lush, green, clean and vibrant rural heartland to a virtual wasteland, characterised by overwhelming odours, noise, pollution of water and air and the stench usually associated with a heavy industry (this is definitely not a farm)

The casual statement in the licence proposal that 'run-off will be directed into the Lenamore River' demonstrates an alarming lack of awareness regarding contamination of this River, feeding into the River Inny over the course of the lifetime of this facility.

There is also the serious issue of spillage while slurry is being transported from the piggery which is a recurring problem and which is not dealt with in the terms of the Licence. In fact, the EPA seem to have no responsibility for slurry once it leaves the compound on its way to other farms, regardless of the damage done *en route*.

Intensive Farming, Methane Gas and Global Warming

During the course of COP 28, which is underway as we write this submission, concerns about our ability to reach targets and maintain our planet as a liveable home have been raised, among them the fact that methane gas levels in the atmosphere have doubled due to human activity and of course, intensive agriculture is the main source of methane which has a high global warming potential.

It seems extraordinary, in this context, that the Environmental Protection Agency, is licencing an intensive agricultural/industrial operation an inevitable by-product of which is emissions of large quantities of methane.

Installation of technology solutions to collect and treat odorous gases

While the proposed licence does contain some commendable terms and conditions such as that the Licencee must 'ensure that members of the public can obtain information at the installation, at all reasonable times, concerning the environmental performance of the installation'; and that noise and odour surveys must be carried out – the question of enforcement and penalties for breeches of the licence are noticeably absent. Our experience of this operator is that he will say whatever is necessary in order to achieve his goal but then fail to implement agreed procedures afterwards.

The following point is particularly pertinent:

6.19.2.6 Where odour impacts occur following implementation of Conditions 6.19.1 and 6.19.2, one or all of the following shall be implemented to the satisfaction of the Agency

- (i) an appropriate reduction/alteration in stock numbers
- (ii) installation of technology solutions to collect and treat odorous gases

We will be monitoring this particularly carefully.

BEAG believes that the above point should be a condition of receiving a Licence and that an industrial Licence *should not be issued* to this facility unless and until the most appropriate technology is installed – that is an Anaerobic Digester. By installing an Anaerobic Digester, the Applicant would demonstrate that he is taking his responsibility for protecting the environment seriously, which has been markedly absent since the establishment of this unwelcome industry in the area. The installation of an Anaerobic digester would ensure that the methane gas produced would be collected and could be used as a fuel for cooking or heating, or it could be burned to generate electricity, as a renewable source of energy.

Conclusion

It is a retrograde step to be licencing a facility that causes so much environmental degradation and pollution at a time when the effects of global warming are plain for all to see. Extreme weather events are occurring with increasing regularity and this will increase and intensify until we take the bull by the horns and embrace a new type of development based on clean technology and renewable sources of energy.