



Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE
Submission Title:	P1098-02
Submission Reference No.:	S011622
Submission Received:	10 June 2024

Application

Applicant:	Tru Poultry Limited
Reg. No.:	P1098-02

See below for Submission details.

Attachments are displayed on the following page(s).



Environmental Health Service
The Arcade
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**HSE Submission Report
National Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000) and
Regulations made thereunder)**

Date: 10/06/2024

Application for: Industrial Emissions License Application

Report To:

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

Class and Nature of Activity: Intensive Agriculture (Poultry)

Applicant: Tru Poultry Limited

Location of Facility: Crossnacaldoo, Tydavnet, Co. Monaghan

EPA Ref. No: P1098-02

EHIS Ref: 3914

The following HSE Departments were notified of the consultation request for the Planning on the 29th of April 2024:

- Emergency Planning
- Estates
- Director of National Health Protection
- CHO 1

Introduction

The National Environmental Health Service has not received any complaints in respect of the applicants existing poultry facility.

In respect of this License application, the areas reviewed were those of concern to Environmental Health which are:

- Air including odour and noise
- Surface and groundwater
- Waste water, poultry litter and waste management

As this activity falls within the category 6.1(a) of Schedule 1 of the EPA Act 1992 (as amended) an Industrial Emissions licence is required. This report only comments on Environmental Health Impacts of the licence application.

This Licence is being reviewed to accommodate the proposed alteration in activity to permit free range poultry farming, in addition to the existing permitted activities, and any associated revisions to the site boundary, additional monitoring/emission points etc.

Application:

Emissions License Application -Intensive Agriculture (Class 6) State the maximum number of birds that will be housed at the installation 100,000. Type of bird to be housed at the installation: Broilers.

This Licence is being reviewed to accommodate the proposed alteration in activity to permit free range poultry farming, in addition to the existing permitted activities, and any associated revisions to the site boundary, additional monitoring/emission points etc.

Planning/Site History:

The site in question is located in a rural area within the townland of Crossnacaldoa. Access to the site is just off a Regional Road, the R186, the area of the site is 8.43ha, including the free range area. It is 2.1km south-west of Carrickroe.

The activity on the site is to be the rearing of poultry in a licensable installation. The farm is located in a rural area. The installation will comprise animal houses, ancillary structures and equipment necessary for the accommodation, management and husbandry of the animals, and the administration of the enterprise. The structures and equipment on the site are to be designed and installed for the purpose of rearing poultry for sale off the site. This poultry farm will operate as a c. 100,000 place traditional broiler farm, or as a 71,000 bird place free range broiler farm.

The proposed development will be completed on a site previously approved by Monaghan Co. Co. and the E.P.A. for the existing traditional broiler rearing activity and

will replace existing approved structure(s) and /or be visually integrated with the existing completed development, and/or the local land topography, so as to minimise any potential visual impact from same.

The proposed development is to be located slightly removed from the existing houses so as to facilitate the free range operation, if the consumer demand arises, but the infrastructural development is essentially similar to that as previously approved. The principle aspect of the proposed alteration relates to operational rather than infrastructural change and the option to operate as a free range enterprise at a reduced stocking rate.

The existing farmyard area, has previously been granted permission for the existing poultry farming activities (1811993, and permission remains in place for House No. 2 (which is to be replaced by the development as currently proposed) Site Location Maps are contained in Appendix No. 1. The existing E.P.A, Licence (P1098-01) was granted to the farm on 07/01/2021, authorising the development of 2 No. poultry houses on this site with an operational capacity of 100,000 birds (in a traditional rearing system, which is now proposed to be amended to also provide for the rearing of c. 71,000 birds in a free range rearing system).

The capacity of the proposed/authorised development will be Poultry farming- 100,000 birds traditional as currently permitted, and the free range capacity of the farm upon completion of the second poultry house on this site (which has essentially been previously approved, and for which permission remains active) will be limited to c. 71,000 birds.

The additional structures and remaining site works required as part of the proposed/previously approved development include meal storage silo(s), soiled water tank, gas storage tanks, completion of the site entrance, access route and any remaining site development/levelling works etc.

Odour:

The National Environmental Health Service notes that an Odour Management Plan has been submitted as part of the planning application and further notes **the mitigation** measures outlined in 'Mitigation Measures'. It is recommended that these measures are included as **conditions** of planning, if granted. This is in order to minimise the impact of odour from the facility on the nearest sensitive receptors and is a public health protection measure.

Management of operations on the site to prevent significant pulse releases of odour at times when the effect might be perceptible beyond the site boundary should ensure minimal impact on air in the vicinity of the site.

Noise levels at the existing poultry facility are low and noise sources at the operation are primarily internal with no expected changes to the external ambient noise environment.

During Demolition & Construction:

It is vital that there is no deterioration in water quality in the watercourses in the vicinity of the development. This will protect both habitats and species that are sensitive to pollution. Therefore, strict controls of erosion, sediment generation and other pollutants associated with the construction process to be implemented.

No development works to take place near to any watercourse. Surface water run-off from the site (during construction) should be routed to the watercourses via suitably designed and sited settlement areas/filter channels.

Fuels, oils, greases and hydraulic fluids will be stored in bunded areas well away from drains. Refuelling of machinery, etc., to be carried out in bunded areas.

Stockpile areas for sands and gravel will be kept to a minimum size, well away from the drains. There will be no disturbance to the banks or habitats along local watercourses.

There will be an amount of waste material from site development works. Same is to be completed in line with the Construction and Demolition Waste Management Plan.

Soil and stone which will be used within the site/landholding. It's use will not lead to the loss or damage of any natural or semi-natural habitats elsewhere and will not be spread close to any local watercourse. All waste material should be segregated, stored and disposed of in accordance with the Construction and Demolition Waste management plan and the E.P.A. Licence requirements.

Surface and Groundwater

The National Environmental Health Service has considered any potential risk of contamination of surface and groundwater and makes the following comments:

Wash water will be collected in the soiled water collection tanks and will be continued to be used for land spreading. Manure generated on site will be removed off site by an authorised contractor six to seven times per year.

Waste water, poultry litter and waste management

Soiled wash water from the site will continue to be diverted to and collected in an underground soiled water collection tank which will be located in front of the proposed poultry house. It is estimated that the volume of wash water generated would be 6 to 12 m³ per batch of broilers (estimated 6-7 batches per year). Wash water will continue to be used for land spreading on the applicant's land. with Section 4.6 'Spreading Poultry Manure' of the EPA's 'Batneec Guidance Note for the Poultry Production Sector' is included as a condition of planning. Compliance

It is recommended that high level **monitors are** installed on the **proposed** washwater **tank to reduce** the risk of **accidental overflow**. This **is recommended for the protection of** nearby watercourses and in the interest of the protection of public health. **The National Environmental Health Service recommends** that the **waste** water storage tank **is inspected** annually to check for structural integrity.

The primary source of non-hazardous waste produced at the proposed facility is poultry litter, fallen birds and a small quantity of domestic waste. The National Environmental Health Service recommends that licensed contractor responsible for the removal of poultry carcasses or reference to facilities for the onsite storage of poultry casualties and all records are maintained regarding disposal. It is recommended that containers for the storage of broiler casualties have sufficient capacity and that the containers are of steel construction and are water, pest and topple proof.

It is recommended that poultry litter is not removed during periods of heavy rain. This is to reduce the potential contamination of storm water (and ultimately surface and groundwater) and is in the interest of the protection of public health.

Due to the increase in the number of birds it is **recommended that the applicant monitors ground nutrients on his lands by way of a Nutrient Management Plan which should be updated annually.**

Pest/Vector Control

Reference could not be found in the EIAR 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, and other potential vectors. The NEHS 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/Energy

The National Environmental Health Service (NEHS) 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. Consideration should be given going forward to renewable energy sources. Renewable energy is energy produced from sources like the sun and wind that are naturally replenished and do not run out. Renewable energy can be used for electricity generation, space and water heating and cooling, and transportation.

Conclusion

In respect of this planning application, the National Environmental Health Service recommends that-

- The odour mitigation measures outlined in 'Mitigation Measures' are included as conditions of planning if granted.
- Any potentially significant impacts arising from noise during the construction phase are assessed.

- Further information is obtained regarding the abstraction well, particularly in respect of water quality and measures used to protect the well from contamination.
- The abstraction well is not used for both a drinking water supply for the domestic dwelling and for **activities** related to poultry rearing.
- High level monitors are installed on the proposed washwater tank to reduce the risk of accidental overflow.
- The waste water storage tank is inspected annually to check for structural **integrity**.
- Containers for the storage of broiler casualties **have** sufficient **capacity and** that the containers are of steel construction and are water, pest and topple proof.
- High level monitors are installed on the **proposed** washwater tank to reduce the risk of accidental overflow.
- Waste water storage tank **is inspected annually to check** for structural integrity.
- It is recommended that a formal complaints procedure should be outlined to resolve any possible issues or community concern in relation to traffic, dust, water, noise, odour or nuisance complaints.

Providing the development is kept as per the specifications detailed and operated and maintained as per Department of Agriculture, Food and Marine Guidance, the NEHS is of the opinion that there is adequate protection of Public and Environmental Health in the license conditions.



Eve Smith
Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)



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10th June 2024

**Re: Industrial Emissions License Application P1098-02
Tru Poultry Limited, Crossnacaldoo, Tydavnet, Co. Monaghan**

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above application.

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

Yours sincerely

A handwritten signature in purple ink that reads "Claire O'Dwyer".

**Claire O'Dwyer
Principal Environmental Health Officer**