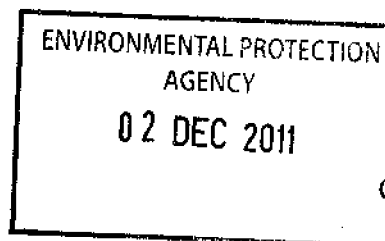


**Ms. Sonja Smith,
 Programme Officer,
 The Office of Licensing, Climate & Resource Use,
 Environmental Protection Agency,
 P.O. Box 3000,
 Johnstown Castle Estate,
 Co.Wexford.**



Woodville,
 Ballymackey
 Nenagh
 Co. Tipperary.

Date: 24/11/2011

Response to EPA letter dated 3/11/2011 with opportunity to comment on separate objections by Mr. Martin Hogan and Mr. Edward O Connor.

Relevant IPPC Reg No.: P0 467 - 02.
Objector Name: Woodville Pig Farms Limited
Location of Activity: Woodville, Ballymackey, Nenagh, Co Tipperary.

Dear Sir/Madam,

Firstly, Woodville Pig Farms Limited has had a number of queries as to the content of the letter dated 11th October 2011. Woodville Pig Farms Limited had difficulty finding the letter dated 11th October 2011 on the EPA public website which stated the following "Woodville Pig Farms Limited intends making a specific objection to some of the conditions of the PD as issued in a separate submission." This was a statement to ensure that the submission of the 11th of October was recorded as a separate submission to the "objection that was to follow". An EIS for the Woodville site accompanied this submission (dated 11/10/2011) and it was expected that the EIS and the letter dated 11/10/2011 would be put on the public website as separate documents. In the interests of transparency and ensuring free access to these documents Woodville Pig Farms Limited request that the EIS and the letter (and associated site plans) be entered on the public website as two separate PDF files.

Woodville Pig Farms Limited have read and studied the objections made by Mr. Martin Hogan and Mr. Edward O Connor to certain proposed conditions in the Proposed Determination for the pig rearing facility at the above address. Woodville Pig Farms Limited welcomes the opportunity to comment on their objections. Woodville Pig Farms Limited support and agree with everything they have said and claimed in relation to the transfer of manure from our installation to farmers who are and/or may be customers for manure regularly or from time to time.


For the avoidance of doubt, Woodville Pig Farms Limited states that the system for the management of manure in this installation to be licensed and for the lawful transfer of manure to customers who seek a supply from the installation is:

- Collect all manure in tanks in the manner required under S.I. 610 of 2010
- Store all manure temporarily in the tanks pending sale or supply and transfer to customers, in response to customer demand, as by-product fertiliser, as is provided for and authorised under S.I. 252 of 2008 and S.I. 253 of 2008, in the knowledge that use by customers is required to be in compliance with standards prescribed in S.I. 253 of 2008 and S.I. 610 of 2010, and
- Record all transfers of manure from the installation as is required by Article 23(1)(g) in S.I. 610 of 2010 and maintain the records for inspectors.

Woodville Pig Farms Limited wholeheartedly agree with the content of the objection from Mr. Hogan and Mr. O Connor. The legislation cited above confers rights and responsibilities on the “**occupier**” of every “**holding**” in the state. Woodville Pig Farms Limited cannot be responsible for matters addressed to the “occupier” of another “holding”. If the Agency has formed any impression to the contrary they are mistaken.

Any conditions in an IPPC licence issued to Woodville Pig Farms Limited must respect the rights of all citizens in the state. The two objections to conditions of the PD as issued clearly highlight the concerns of users of pig manure, and the fact that the Agency continues to ignore the rights conveyed on them by national and European legislation. This is a matter for the Agency to deal with as a matter of urgency. Woodville Pig Farms Limited expect all conditions in a licence issued to Woodville Pig Farms Limited to deal only with matters that are and can be under its control.

Yours Sincerely


(Tim Cullinan)