

Mr. Patrick Byrne,
Senior Inspector,
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 ; 29th August, 2012.

Request for Technical Amendment of IPPC Licence Reg. No P0 467 - 02.

Applicant/ Licensee Name: Woodville Pig Farms Limited
Location of the activity: Woodville, Ballymackey, Nenagh, County Tipperary.

Dear Mr. Byrne,

Woodville Pig Farms Limited makes this request for a technical amendment to the Final Determination as issued by your Office on 27th July 2012.

It has always been the intention of Woodville Pig Farms Limited to increase the stock numbers at the breeding site. This was clearly stated in previous correspondence and in oral communications with Agency staff. All of the existing buildings at the Breeding Unit in Woodville townland have planning permission. A new planning permission was lodged with North Tipperary County Council to increase the pig numbers as shown below in Column 3 of Table 1. The total number of pigs currently accommodated on the site is shown in Column 2 of Table 1 below:

TABLE 1. Summary details of stock numbers at Breeding Unit

Animal Type	Existing Stock Numbers	Proposed Numbers ^{Note 1}
Farrowing Sow	220	350
Dry Sow	700	850
Gilts	109	300
Boars	12	15
Weaners	3,850	6,600
Total	4,891	8,115

Note 1: Full planning permission was granted by North Tipperary County Council for accommodation for these increased numbers on 28/1/2012.

All of the existing and proposed buildings at the Production Pig Unit in Ballyknockane have planning permission.

The Agency is aware that Woodville Pig Farms Limited sought and obtained planning permission for the increased stock numbers at the Woodville Breeding Unit as outlined above. An updated EIS and planning application was lodged with North Tipperary County Council and the requisite copies of the EIS were forwarded to the Agency with the submission dated 11th of October 2011. The site plans for the Woodville site were updated to allow for increased manure storage and the boundary (marked by a red line) showed clearly the buildings and location where the pig rearing activity of Woodville Pig Farms Limited is and will be carried on. The monitoring point for roof/storm water (referenced as SW2 in Schedule C.2.3 of the proposed determination document) at the Woodville site was also amended to allow for the proposed new buildings on this site.

These site plans are the most relevant and up-to-date site plans for the pig rearing activity of Woodville Pig Farms Limited. They were submitted to the Agency with the submission dated 11/10/2011 to ensure no future ambiguity in relation to the site of activity of Woodville Pig Farms Limited.

Woodville Pig Farms Limited submitted the copies of the EIS as part of the submission dated 11th October, 2011. It was a separate submission to the objection lodged by Woodville Pig Farms Limited to the PD which followed afterwards. The Agency accepted both documents and appears to want them treated as one "objection". As part of a separate planning process the EIS was processed by North Tipperary County Council and the Agency Technical Committee in its Technical Report as part of the review process acknowledged that initial planning permission was granted on 15/12/2011.

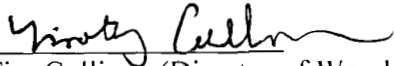
The planning authority would have been aware of the site having an IPPC licence and the Agency would be one of the statutory bodies to obtain a copy of the EIS from the planning authority. The Agency would therefore have had every right to comment on the EIS at that stage if it saw fit to do so.

It is very concerning that the Agency would issue a licence for a substantial number of animals less than the number authorised by the Planning Authority. Woodville Pig Farms Limited believes that North Tipperary County Council is fully aware of and compliant with the EIA Directive. The argument for not allowing the pig numbers as shown in Column 3 of Table 1 above is questionable in light of the fact that the EIS was processed by North Tipperary County Council. Woodville Pig Farms Limited suggest that the Agency support the argument for inserting Column 3 as suggested in the objection dated 14th October, 2011 (ie "subject to planning permission being obtained") from Woodville Pig Farm Limited. It suggests that this be done by means of technical amendment as may be allowed under Section 96 of the EPA Acts of 1992 to 2007.

Otherwise, Woodville Pig Farms Limited will be put to the expense and time of another "review" of our IPPC Licence.

I would welcome the opportunity to meet with you or any Agency personnel to address the issues raised above.

Yours sincerely



Tim Cullinan (Director of Woodville Pig Farms Limited).

cc. Dr Laura Burke, Director General of The Environmental Protection Agency.

Attachments

Copy of Grant of Full Planning Permission for Woodville site dated on 28/1/2012.

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