



An Taisce

*The National Trust for Ireland*

**Submitted online via the EPA's website**

Office of Climate, Licensing & Resource Use,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford

6 February 2013

**Westland Horticulture IPPC Licence Application (P0914-01)  
Peat extraction near Lough Derravaragh SPA, Co. Westmeath**

To Whom It May Concern:

In respect of the above-mentioned IPPC licence application, we are writing to you further to: the Department of the Environment's submission of 21 June 2010; my submission of 3 August 2010 (in the name of Friends of the Irish Environment); and my submission of 14 February 2012 (also in the name of Friends of the Irish Environment), this final submission relating primarily to Bulrush Horticulture Ltd's ongoing IPPC application (renumbered P0974-01; formerly P0599-02), but highlighting issues of direct relevance to this application, given the proximity of Westland's and Bulrush's operations in Co. Westmeath.

We note the EPA's recent decision - almost three years after the present application was lodged - to subject this licence application to an environmental impact assessment pursuant to the EIA Directive (Directive 85/337/EEC; recently codified as Directive 2011/92/EU). An Taisce is surprised and concerned, however, that the EPA has not screened for (and then carried out) an appropriate assessment of 'in combination' effects on the Lough Derravaragh Special Protection Area (SPA) for birds as part of this licence application, pursuant to the Habitats Directive (Directive 92/43/EEC) and the European Communities (Birds and Natural Habitats) Regulations 2011 (No. 477/2011).

For the reasons set out in full in the above-mentioned submissions, such an assessment is required as a matter of law. (Note that the Department of the Environment's submission cited above explicitly supports this view.) We should therefore be grateful for your confirmation in writing that an appropriate assessment of 'in combination' effects on Lough Derravaragh SPA will be carried out in respect of this licence application.

Yours faithfully,

Andrew Jackson,  
Natural Environment Officer  
[naturalenvironment@antaisce.org](mailto:naturalenvironment@antaisce.org)

## Maire Buckley

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**From:** Licensing Staff  
**Sent:** 06 February 2013 14:41  
**To:** Sonja Smith; Maire Buckley  
**Subject:** FW: New submission entered for Reg no: P0914-01. (Reference Number: P0914-01-130206021035)  
**Attachments:** 20130206 - Westland IPPC application.pdf  
**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**From:** Andrew Jackson [<mailto:naturalenvironment@antaisce.org>]  
**Sent:** 06 February 2013 14:11  
**To:** Licensing Staff  
**Subject:** New submission entered for Reg no: P0914-01. (Reference Number: P0914-01-130206021035)  
**Importance:** High

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