



**OF  
LICENSING &  
RESOURCE USE**

**ENVIRONMENTAL LICENSING PROGRAMME**

<b>To:</b>	Director
<b>From:</b>	Pamela McDonnell - LICENSING UNIT
<b>Date:</b>	10 December 2014
<b>RE:</b>	<b>Request for Technical Amendment to IE licence reg. P0412-01, held by Harvest Lodge Pigs Limited, Gortnamuc, Kilcormac, Co. Offaly.</b>

On the 28<sup>th</sup> August 2014, a Technical Amendment (TA) request was received from Harvest Lodge Pigs Limited, licence Reg. No. P0412-01, to accommodate an increase in the number of animals housed on site on foot of the site changing from a sow breeding unit to a fully integrated unit.

**Background**

An IPC licence was granted to Kilcormac Farms Limited (later known as Gortnamuc Pigs Limited) on the 12<sup>th</sup> October 1999 for a 1122 sow breeding unit, which focusses on producing and rearing pigs to weaner stage.

The licence was transferred, in accordance with Section 94 of the EPA Acts, to Harvest Lodge Pigs Limited on the 26<sup>th</sup> February 2009. The licence has since been amended as follows:

- Technical Amendment A, issued on the 14<sup>th</sup> October 2009, to bring the licence into conformity with the requirements of the IPPC Directive (96/61/EC).
- Technical Amendment B, issued on the 4<sup>th</sup> February 2013, to bring the licence into conformity with the requirements of the Environmental Objectives (Groundwater) Regulations 2010, as amended and to change conditions in the licence in relation to the control and management of organic fertiliser.
- Section 82A(11) Amendment, issued on the 17<sup>th</sup> December 2013, to bring the licence into conformity with the requirements of the Industrial Emissions (IE) Directive (2010/75/EU).

It should be noted that as the original Inspectors report states that the weaners held on site weigh up to 32-36kg, the IED amendment made on the 17<sup>th</sup> December 2013 identifies that IE licence Reg. No. P0412-01 is for the following classes of activity under the First Schedule of the EPA Act 1992, as amended:

- 6.2 The rearing of pigs in an installation where the capacity exceeds:
  - (a) 750 places for sows, or
  - (b) 2,000 places for production pigs which are each over 30kg.

Schedule 1(i) of the licence restricts the animal numbers housed on site, as outlined in Table 1 below.

On the 5th January 2012, the licensee requested permission to apply for a licence review to accommodate changes to the allowable pig numbers housed on site arising from the conversion of the site into a fully integrated unit. The proposed numbers are detailed in column 3 of Table 1 below. While the number of sows and weaners housed on site are proposed to decrease, the number of finishers are proposed to increase, which would result in an additional 318 pigs being housed on site overall.

Table 1:

<b>1. Animal Class</b>	<b>2. Stock numbers as per Schedule 1(i) of licence P0412-01</b> <small>Note 1 &amp; 2</small>	<b>3. Proposed stock numbers</b>
<b>Farrowing sows</b>	920	132
<b>Dry sows</b>	202	480
<b>Gilts</b>	80	75
<b>Boars</b>	35	10
<b>Weaners</b>	4362	2500
<b>Finishers</b>	280	3000
<b>Total</b>	5879	6197

Note 1: This excludes suckling pigs maintained on site.

Note 2: Variation in these numbers is allowed providing the overall number of units remains unchanged.

The EPA responded to the licensee's review request on the 11<sup>th</sup> June 2012 instructing the licensee to apply for a licence review to accommodate the changes proposed.

### **Technical amendment**

On the 28<sup>th</sup> August 2014, Harvest Lodge Pigs Limited requested that the changes to pig numbers outlined above be accommodated into the licence by TA. They stated they had been unable to proceed with a licence review application due to the financial costs involved. They point out that the changes to pig numbers proposed would result in a slight reduction in the volumes of pig slurry produced annually (reducing from 10,324m<sup>3</sup> per annum to 9,154m<sup>3</sup> per annum) and that the proposed activity would take place within the existing structures on site.

### **Consultation with the Office of Environmental Enforcement (OEE)**

I have consulted with the OEE Inspector, Irene Doyle, in relation to this technical amendment request. The OEE confirmed that the change could not be accommodated under the conditions of the existing licence. They have also confirmed that the proposed changes to the site have not yet been implemented.

## **Assessment**

The changes proposed by the licensee will result in a marginal increase in the overall numbers of pigs housed on site, which will require changes to Schedule 1(i) of licence Reg No. P0412-01. It is noted that manure levels will decrease slightly and the existing structures on site will remain unchanged, and that the classes of activity in the licence will remain unchanged.

While the overall pig numbers on site will only increase marginally, the nature of the activity is changing from a breeding unit to an integrated sow unit. In the breeding unit, weaners are sold at approximately 30kg. However in an integrated unit, while the number of sows on site will reduce, greater numbers of animals will be retained to finisher weight (>30kg weight). Odour and ammonia emissions may therefore increase and an assessment of impact is necessary as part of a licence review. An odour assessment has not been provided in support of this TA request.

The planning status of the site and the need for EIA will also need to be addressed as part of a licence review.

## **Recommendation**

It is considered that the requested change goes beyond the scope of Section 96(1)(b) and 96(1)(c) of the EPA Act, as amended. I recommend that the technical amendment request, as sought, be refused

Pamela McDonnell

Pamela McDonnell  
Inspector  
Office of Climate, Licensing and Resource Use.