

Office of Environmental Enforcement,
Environmental Protection Agency,
Regional Inspectorate,
McCumiskey House,
Richview,
Clonskeagh Rd.,
Dublin 14

19st July 2016

Re: JMW Farms P0696-02 - Amendment request

Dear Sir/Madame,

I refer to the Licence granted to the above mentioned farm on 16th February 2011, and in particular Condition No. 1.4 of same.

In this regard approval is sought for a technical amendment to provide for;

- A. the revision to the site boundary (Condition No. 1.3) of the licence to incorporate an additional area to the rear of the site to accommodate the proposed development in line with the planning permission as granted.
And
- B. a marginal increase in stock numbers (+800 production pigs – Schedule A1) in line with said planning permission (Ref. No. 14/97), to house replacement breeding stock on the site and operate and enclosed herd health policy. Note. The revised details are in keeping with the Inspectors report of 10/12/2014, however as per subsequent Agency recommendations the gilts will be treated as production pigs for the purposes of any subsequent assessments.

Table 1:

1. Animal Class	2. Stock numbers as per Schedule A.1 of licence P0696-02 <small>Note 1</small>	3. Animal Class	4. Proposed stock numbers <small>Note 1</small>
Sows <small>Note 2</small>	1,200	Sows <small>Note 4</small>	1,650
Gilts	550	Gilts <small>Note 5</small>	900
Weaners	6,800	Weaners	6,800
Production pigs <small>Note 3</small>	0	Production pigs <small>Note 3</small>	0
Total	8,550	Total	9,350

Note 1: This excludes suckling pigs maintained on site.

Note 2: Sow means a female pig after its first farrowing

Note 3: Production pig means any pig over 30kg in weight which is being fattened for slaughter

Note 4: Sows and served gilts, in accordance with CJEU Judgement in Case C585/10.

Note 5: Malden gilts only (unserved)

1. Purpose of Proposed Amendment

As the Agency are aware bio-security measures have increased substantially on a number of pig farms. This has been encouraged due to the outbreak of PRRS (Blue-ear) in recent years. As part of their on-going farm management practices, JMW Farms reviewed the bio-security measures on this farm, and this highlighted a perceived weak spot in the measures implemented on-site, namely the introduction of replacement gilts from outside farms into this farm.

This existing pig farm is what is referred to as a breeding unit. At present the herd consists of c. 1,200 Sows (a female pig after its first farrowing) and 550 gilts with all pigs reared to weaner, as per the Licence granted to this farm. All weaners are then moved to off-site finishing accommodation elsewhere. The number of gilts currently provided for covers gilts from movement onto the farm, from outside farm(s) at c. 100kg's (pre-service) to the point of farrowing.

It is the farms intention to put in a programme to breed replacement gilts on the farm. This will allow the farm to be in full control of the breeding programme, and maintain an enclosed breeding policy, thus minimising any potential health risks to this farm associated with importing stock from other farms.

The proposed amendment will provide the required accommodation to rear c. 800 replacement gilts on the farm from c. 30 Kg (the weight at which they are currently moved off-site) to c. 100 Kg (the weight at which they are currently moved on-to the site). The proposed development will not provide for any increase in the production capacity of the farm, and there will be no increase in any other class of stock (sows, weaners etc.), and is designed merely to allow for an enclosed herd health policy.

Gilts will be selected from the weaners (c. 30 kg's) prior to the remaining weaners being moved off-site, and reared in the proposed specialised gilt rearing accommodation to be provided. This will allow the farm to use specialised gilt rearing diets as required and will allow the gilts to be reared in the optimum manner so as to ensure that the maximum number of healthy productive replacement gilts are entering the herd.

This proposed gilt rearing house will hold c. 800 pigs. The production system on the farm requires c. 30 gilts per week for the breeding herd. In order to achieve the required number of gilts at the end of the period c. 60 gilts are to be selected on a weekly basis.

The pigs are reared from 30kg to 100 kg at a slower rate than normal production pigs over a 90-95 day period to ensure the highest standards of functionality and longevity in the breeding herd, and maximum milk production. As part of the selection and management policy, approximately 50% of the pigs selected at 30kg, are deemed not to be suitable as replacement gilts by the time they reach 100kg and are fattened for slaughter. This is due to poor performance, locomotion issues, mortality etc.

Number of spaces required = $60 \times 13 = 780$ (Rounded up to 800)

The proposed development will;

- Not increase the production capacity of the farm.
- not alter the class of licence required (i.e. will not result in >2,000 production pigs being held on the farm)
- increase organic fertiliser production by in the order of c. 10-12%.
(Organic Manure production will increase by c. 1,622.4 m³/annum to 12,480m³/annum.

2. Appropriate Assessment Screening

The proposed development is located c. 15 (14.475) Km away from any Natura 2000 site and therefore is highly unlikely to adversely impact on same. The proposed development is also located outside of the catchment area of the closest Natura 2000 site, Slieve Beagh SPA.

In order to screen the potential impact of the ammonia and Nitrogen emissions from this proposed alteration it was decided to use a freely available online model (SCAIL Agriculture <http://www.scail.ceh.ac.uk/cgi-bin/agriculture/input.pl>) to calculate the ammonia and nitrogen deposition at designated sites in the vicinity of the activity. The model “is a simple online screening tool that can be used in IED applications, EIAs or Appropriate Assessments in Ireland and the UK to estimate the effect of an agricultural emission (e.g. pig house) on a habitat (e.g. SPA, SAC). This estimate can then be used to determine the exceedance or non-exceedance of the habitat's impact limit and will help users in deciding whether more detailed modelling or site specific investigation is required”. SCAIL Agriculture runs the atmospheric dispersion model AERMOD to model emissions from livestock installations and associated storage and spreading. The model takes into account regional wind statistics for 40 UK and Irish meteorological stations and users can input details of their source (e.g. livestock numbers). The new system also automatically looks up protected sites (e.g. SSSI, SACs) within a set radius of the source.

The SCAIL Agriculture model results (in relation to the proposed 800 additional pig places – assessed as production pigs) indicated a contribution from the development of 0 % of the critical load for Ammonia (process contribution of 0.01 micro grammes) and a process contribution of 0.05micro grammes (or 0.27% of the background level) for Nitrogen deposition at Slieve Beagh SPA (004167).

Given the conservative nature of the model, the activity having been established for a long number of years, the distance between the activity and the European sites, and the fact that the development is located outside of the water catchment for same it is considered that there will be no likely significant impact on the designated sites associated with the proposed development..

3. Impact of the Proposed Development

3.1 Manure Production/Storage

As previously details the proposed development will result in an additional 1,622.4 m³ organic fertiliser/annum. Additional manure storage of c. 1,572 m³ has been proposed which will provide c. 12 months storage capacity, well in excess of the 6 months required.

3.2 Pig Movement

As per the plans submitted all stock will move to and from the proposed development via a slatted/concrete passageway with all pig movement on hardstanding areas. All soiled water to be collected in manure storage tanks.

3.3 Storm Water

All roof water from the proposed development will be transferred to the rainwater collection tank, with any excess discharging through the existing discharge point, thus no new emission points are required.

3.4 Odour Emissions

The existing farm has had no odour complaints to date. As the Agency are aware the farm has been significantly rebuilt over recent years with significant investment in housing and manure storage structures, and the elimination of open external manure storage tanks. The proposed development will be completed in the same manner and no significant adverse odour impacts are anticipated.

3.5 Ammonia and N Emissions

As per the Scail Agriculture screening report, any potential adverse impact from same is negligible.

4 E.I.A.

As the Agency will be aware a comprehensive E.I.A. of the existing development was completed as part of the planning permission and Licence review process previously undertaken. Monaghan Co. Co. have concurred with our understanding that the currently proposed development did not require an additional E.I.A. in line with the requirements of the Planning and Development Regulations (as Amended).

In our view the proposed development should be able to be accommodated as a technical amendment to the existing licence as granted rather than necessitating a full review.

5 Inspectors Report of 10/12/2014

The applicant feels that based on the additional information contained in this submission, i.e.,

- No significant impact on Natura 2000 sites,
 - No significant increase in ammonia/Nitrogen emissions,
 - The continuation of activities on this farm in a compliant manner,
- And
- the proposed development of gilt accommodation to improve the bio-security on the farm, with the resulting improvements in animal health, efficiency (due to a lower disease risk/burden), and improvement in performance,

that the requirements Section 83(5) of the E.P.A. act (as amended) will continue to be satisfied and there should be scope to accommodate same under the relevant sections of the E.P.A. Acts (as amended) and provide for the technical amendment of this licence.

Please find attached the required information as follows;

1. Copy of Planning application drawings showing the revised site boundary.
2. Copy of Grant(s) of planning permission.
3. Copy of inspectors' reports.

Should you require any additional information please do not hesitate to contact me.

Yours Sincerely,



Paraic Fay B.Agr.Sc.