

REASONS FOR REVIEW

**WOODVILLE PIG FARMS LTD,
WOODVILLE,
BALLYMACKEY,
NENAGH,
CO. TIPPERARY**

2020

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Attachment 1.1

CURRENT LICENCE REF: P0467-02

Application Ref: LA004791

Initial Licence (P0467-01)

Woodville Pig Farms Limited, Woodville, Ballymackey, Nenagh, County Tipperary, under Section 83(1) Environmental Protection Agency Act, 1992, were initially granted a licence to carry on the following activity:

'the rearing of pigs in installations, whether within the same complex or within 100 metres of that complex where the capacity exceeds 1,000 units on gley soils or 3,000 units on other soils and where units have the following equivalents: 1 pig = 1 unit and 1 sow = 10 units.'

Current Licence (P0467-02)

Woodville Pig Farms Limited was granted an IPPC licence Reg. No. 467-01 to operate a 620 sow integrated unit located at Woodville, Ballymackey, Nenagh, County Tipperary on 29th March 2000. By agreement with the Agency under IPPC licence Reg' No. P0467-01 the maximum licensed animal numbers were amended to 220 farrowing sows, 700 dry sows, 109 gilts, 12 boars, 3,840 weaners and 0 production pigs, i.e. a 920 sow breeding unit on 20th April 2004.

The installation was authorised to undertake the following activity under the terms of this revised licence:

1. *To incorporate an existing production pig unit located at Ballyknockane, Ballymackey, Nenagh, County Tipperary.*

The breeding unit and production pig unit are located on separate sites within approximately 1.8 km of each other.

A revised IPPC licence (Reg. No. P0467-02) was issued on 27th July 2012, allowing 220 farrowing sows, 700 dry sows, 109 gilts, 12 boars, 3,850 weaners and 8,000 finishing pigs. This licence review incorporated the finishing unit at Ballyknockane into the Woodville Pig Farms Ltd licence.

The licence was again reviewed to an Industrial Emissions licence on 16th December 2013, and the licence activity was amended to 6.2(a) and 6.2(b) of 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;
 - (b) 2,000 places for production pigs which are each over 30kg.

Proposed Changes

Planning permission has been sought from Tipperary County Council by Woodville Pig Farms to demolish a gilt house, two weaner houses and one first stage weaner house and to construct a modern second stage weaner house and extend farrowing Unit 1 with additional farrowing sow accommodation, convert farrowing Unit 2 to loose sow accommodation, extend Unit 2 to provide additional weaner accommodation, construct a new pre-finisher house for slow growing pigs, construction of a slurry reception tank and all associated site development works at their pig rearing facility in Woodville (Tipperary Co Co Planning File Reference No: 20211).

All proposed alterations to structures and animal numbers would occur at the Woodville pig rearing site. There would be no alterations to the structures or animal numbers at the Ballyknockane finishing site.

The extension of the farm would allow for an increase in the live weight of pigs at sale, an increase in sows and stock numbers and an increase in animal welfare and production efficiency to sustain the financial viability of this pig rearing enterprise.

The proposed new structures will lead to a more efficient production system, as they will allow more space for the production of heavier pigs that the market now seeks.

There will be much greater scope to manage disease by increasing the accommodation on the site and allowing a longer time for disinfection and drying of rooms between batches of pigs.

Advances in the genetics of the Irish sow herd are responsible for increases in numbers of piglets born alive. However, there has been a concomitant increase in the number of small and weak piglets produced. These problems culminate in piglets dying at a younger age, or reaching finishing weight at a slower rate.

The proposed development would modernise the design of farrowing places at the breeding site and improve animal welfare in order to accommodate the larger piglet litters that genetic improvements in modern pig breeds have brought, larger farrowing pens are needed to provide sufficient space for the sow and the piglets.

The provision of a separate finisher unit for slow growing pigs would also improve animal welfare by improving survival rates for pigs at the site and therefore improve the production efficiency at the site.

Current and proposed maximum animal numbers housed at the Woodville (breeding unit) site are included in Table 1.1 below. No finisher pigs are kept at the Woodville site.

Table 1.1: Current and Proposed Maximum Pig Numbers at the Woodville Site.

ANIMAL CLASS	EXISTING EPA LICENSED NO. OF PIGS <small>NOTE 1, 2</small>	PROPOSED NO. OF PIGS
WOODVILLE		
Dry Sows / Farrows / Suckling Sows	920	1,650
Weaners	3,850	8,400
Pre-Finisher	----	4,200
BALLYKNOCKANE		
Finisher Pigs	8,000	8,000

Note 1: This excludes suckling pigs maintained on site.

Note 2: A 20% increase in the number of production pigs (finishers) held on site, for a period not exceeding 2 weeks, is permissible. The frequency of such occurrences must be kept to a minimum. Any other variation in any of the animals numbers specified requires prior agreement from the Agency.

The proposed development would not have an effect on the stock numbers at the Ballyknockane site, which is currently 8,000 finisher pigs that are reared to slaughter weight.

In addition to alterations to the activity arising from the proposed planning permission, it is intended to change the current licence site boundary. The proposed new site boundary is shown in Attachment 3.2.2_Site-Plan of this application.

The proposed site boundary would be altered by the proposed development by adding additional lands, structures and extensions along the northern boundary of the site.

In addition, as part of this licence review application, it is proposed to remove the milling facility area from the eastern EPA licence boundary. The milling area is under the control of Tipperary Milling Company Limited, a separate business to Woodville Pig Farms Limited. The directors of Woodville Pig Farms Limited and Tipperary Milling Company Limited are the same. Tipperary Milling Company Limited does not conduct an activity which would require an IPPC or IE licence, and conducts business and supplies customers which are not associated with the Woodville Pig Farms Limited activity.

It is also proposed to remove agricultural land and a residence from the southern EPA licence boundary. The exception is While these lands are in the ownership of the applicant, the use of these properties is not associated with the Woodville Pig Farms Limited activity.

In summary, the principal changes to the activity would be as follows;

- Increase in animal numbers at the Woodville townland pig rearing farm.
- Increase in production, waste and emissions from Woodville townland pig rearing farm.
- Alteration of the activity boundary.

Reason for Review

Using the Screen Questions, as seen in Table 1.2 below, provided in the EPA document '*Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity*' (June 2019) it was determined that a licence review was necessary, as the above mentioned development does require an EIAR to be submitted as part of the planning application process.

Screening Question:

Does the proposed alteration involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála?

Guidance Note:

Proposed alteration(s) that require an EIA by the planning authority indicates that the alteration is likely to have a significant effect on the environment and therefore the EPA would regard the alteration as being substantial in nature.

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Table 1.2: Screening Questions and Option Selection

	Category	Screening Question
1	<p>Review/ new licence</p> <p>A positive answer to any of these questions indicates a licence review or new application is likely to be required</p>	<p>Does the proposed alteration:</p> <ol style="list-style-type: none"> 1. Require a new class of activity or process? 2. Cause new/ additional main emission point? 3. Increase the total specified emissions for any emission parameter? 4. Increase significantly the overall total emissions from the installation/facility? 5. Involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála? 6. Require the preparation of a Natura Impact Statement (NIS) for consideration by any planning/ public authority? 7. Indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)? 8. Conflict with BAT as set out in the relevant BAT conclusions? 9. Adversely affects the energy efficiency of the installation/facility? 10. Adversely affects the environmental risk of the installation/facility significantly? 11. Cause an increase above the capacity limitations specified in a licence? 12. Require an extension of operating hours (where controlled by the licence) for an installation/ facility where the public is likely to have an interest in such an extension? 13. Involve the incineration or co-incineration of waste materials displaying hazardous properties that were not previously authorised (as per the WID/IED)? 14. Introduce materials or techniques which adversely alter the probability, magnitude and duration or complexity of the installation/facility transboundary impact? 15. Constitute a substantial change? 16. Regularise an on-going breach of a licence condition?