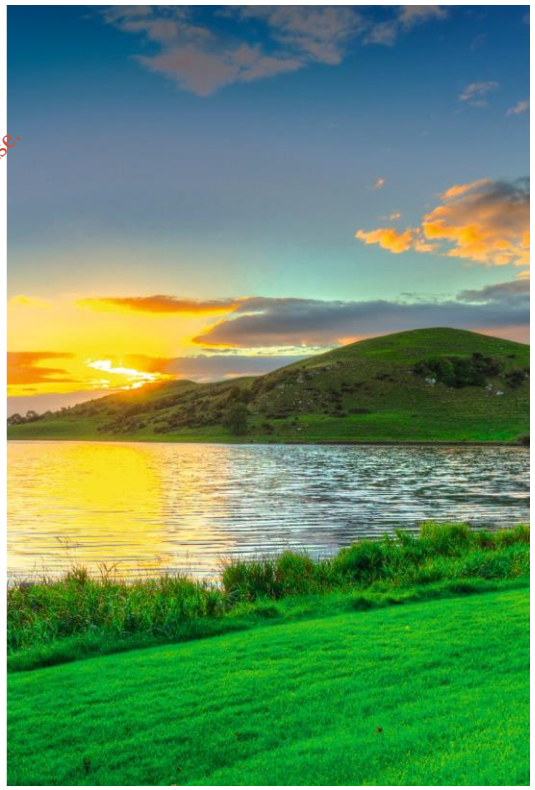
Rowan

Environmental Impact Assessment Report
Scoping Report



Silver Hill Duck

July 2020

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1. Introduction

1.1 Purpose of this Report

This Environmental Impact Assessment (EIA) Scoping Report sets out the proposed scope of work and methods to be applied in the development of an Environmental Impact Assessment Report (EIAR). It is to be used to support the EPA licence review for the Silver Hill Duck facility (hereafter referred to as the facility) in Emyvale. It also provides the proposed structure and contents of the EIAR.

Scoping is the process of determining what information should be included in the EIAR and which methods should be used to collect and assess that information.

The main objectives of this report are:

- Identify environmental effects which may arise during the construction and operation of the facility and which should therefore be addressed in more detail as part of the EIAR;
- Outline proposed assessment methodologies for completing the EIAR;
- Outline the likely contents of the EIAR; and
- Form a basis of common reference regarding the scope and methodology for the EIAR.

1.2 EIA Scoping Report Structure

The EIA Scoping Report structure is as follows:

Section 1: Provides an overview of the purpose and objectives of this EIA Scoping Report.

Section 2: Provides a description of the facility which is under consideration for this EIA Scoping Report.

Section 3: Provides an overview of the EIA process and the approach to the development of the EIAR.

Sections 4 – 13: These sections identify possible effects on the environment and outline the proposed assessment methodology that will be adopted in assessing the effects. The environmental aspects that will be considered in the EIAR are outlined below:

- Section 4: Population and Human Health;
- Section 5: Biodiversity;
- Section 6: Soils, Geology and Hydrogeology;

- Section 7: Water and Hydrology;
- Section 8: Air Quality and Climate;
- Section 9: Noise and Vibration:
- Section 10: Landscape and Visual;
- Section 11: Traffic and Transport;
- Section 12: Waste Management; and
- Section 13: Archaeology, Cultural Heritage and Architectural Heritage.

2. Project Description

2.1 Description of the Facility

The site is located just north of Emyvale, Co. Monaghan. The site as a whole, including auxiliary lands and infrastructure, encompasses approximately 35 hectares and is accessed by the N2 - the Dublin to Derry road. The site is set over a number of levels with the main processing and facilities area on the higher part off the site at an elevation of approximately 70m Above Ordnance Datum (AOD) and the lower part of the site encompassing the waste water treatment plant (WWTP) and environmental management area at 60m AOD.

Founded in 1962 by Ronnie and Lyla Steele in Emyvale, Co. Monaghan, Silver Hill Duck is a fully integrated duck producing company. All aspects of duck production are owned and controlled by Silver Hill Duck. The production facility in Emyvale undertakes the processing, cooking and packaging of the product. In March 2019 Fane Valley Group acquired Silver Hill Duck. Fane Valley is a progressive agri-food business, based in Northern Ireland and has been Silver Hill's feed nutrition partner for over 20 years. The site currently employs 180 people.

The processes at Silver Hill Duck are as follows;

- Day old ducks are transported from the Hatchery in Bragan and placed on the duck rearing units. Silver Hill Duck employ 23 Contract Growers along with managing two of their own duck rearing farms. The Contract Growers are located in counties Donegal, Down, Monaghan, Waterford, Cavan, Armagh, Fermanagh and Tyrone.
- Silver Hill Duck Farm in Emyvale has the capacity to rear 80,000 ducks. Currently there are no ducks reared onsite due to the Covid 19 pandemic. It is envisaged that 40,000 of the capacity will be needed in 2021.
- When the Ducks have reached an age of 42 days they are slaughtered in the processing plant and are produced into both cooked and raw duck products. Approximately 3.5 million ducks are processed per year, with kills occurring 5 days per week Mon-Fri. Current kill pattern is 3 days a week to align production with sales during Covid pandemic.
- The feathers are washed at the Feather Plant onsite and are sorted according to their grade. The feathers are then sold in bulk or made into duvets, cushions, clothing and sold. All waste feathers are sent as Category 3 to Farragh Proteins, Crossdoney, Co. Cavan.
- The manure produced by the ducks on the offsite supplier farms is removed by licensed hauliers and is used as organic fertiliser by farmers – under Nutrient Management Plans (NMP) which are prepared to comply with the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2017 (S.I. No. 605 of 2017).
- If manure is produced on the Silver Hill site, it is stored in purpose-built tanks with level alarms which are centrally controlled by the PLC system. It too is landspread under NMPs prepared under the aforementioned regulations.

- Silver Hill Duck have a Waste Water Treatment Plant (WWTP) on site to treat the process water and then release the final treated water to the stream in accordance with the EPA Licence.
- All parts of the duck are sold. All offal products sent worldwide are transported via transport companies sourced by the Agent involved in getting product to these regions.

2.2 Description of the Project

2.2.1 EPA Review

The EPA review was initiated to address two key changes proposed at the site – drip irrigation for treated wastewater disposal and a new pet food processing plant.

The drip irrigation system would use land adjacent to the site in up to 9 or 10 plots each with an area of 1.6ha. Treated water would be piped to the fields and dispersed in the soil matrix using a network of distributor pipes. The design flow rate would be 3l/m2/day.

In addition to ongoing normal operations, Silver Hill Duck are examining options to convert their offal waste stream material into a raw material for use in the pet food industry or other similar industries. The processes will involve cooking the offal and then separating the solid material and the fat. It is proposed to locate this process on site by developing the building at the environmental management area, which was previous built for the processing of duck waste following anaerobic digestion.

3. Approach to the Environmental Impact Assessment

3.1 Introduction to the EIA Process

EIA is the process for anticipating the effects on the environment caused by a facility or development at a particular site. Where effects are unacceptable, design or other measures can be taken to avoid or reduce these effects to acceptable levels. The initial EIA Directive is in place since 1985 (85/337/EEC). This Directive along with three amendments was amalgamated into Directive 2011/92/EU in December 2011. Proposed changes to the Directive were adopted by the Council of the European Union in May 2014 (2014/52/EU) with a 3-year period to transpose the changes. These changes formed the first revision of the Directive 2011/92/EU.

The EU (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) transpose the requirements of Directive 2014/52/EU into planning law in Ireland and came into effect from the 1st September 2018.

The EIA Directive requires that certain developments be assessed for likely environmental effects before planning permission can be granted. When submitting a planning application for such a development, the applicant must submit an EIAR.

The EIA process can generally be summarised as follows:

- Screening – Is an EIA required
- Scoping – What issues should be considered within the EIAR?
- Baseline Data Collection – Establishing a robust baseline of the existing environment on and around the facility. This stage includes a review of existing available information and undertaking any surveys identified during the scoping phase;
- Impact Assessment – Assessment of the environmental impacts and establishing their significance;
- Mitigation – Formulation of mitigation measures to ameliorate the potential impacts of the facility which cannot be avoided practically through site design;
- Consultation – With Statutory Stakeholders, the public, and other bodies as required;
- Decision – The competent authority decides, taking into consideration the results of consultations, if the facility can be authorised;
- Announcement – The public is informed of the decision; and
- Monitoring – Monitoring of the effectiveness of implemented mitigation measures.

3.2 EIA Screening Assessment

Screening is the first stage of the EIA process, whereby a decision is made on whether or not a mandatory EIA is required. A mandatory EIA is required for developments or projects that are a classification specified by Annex 1 of the EIA Directive, as amended, or by Schedule 5 of the Planning and Development Regulations 2001, as amended.

Following correspondence and discussions with the EPA, they have advised that they consider that the licence review requires the benefit of an EIAR with a view to demonstrating that the facility will not present any significant environmental impacts in the future and the EIAR is proceeding under that advice.

3.3 Environmental Impact Assessment Scoping

Following screening, 'scoping' is the process of determining the content and extent of matters that should be covered in the environmental information contained within the EIAR. Scoping requires the consideration of the nature and likely scale of the potential environmental impacts likely to arise from a facility.

3.4 EIAR Methodology

This assessment of environmental impacts will be conducted giving consideration to best practice. The Environmental Protection Agency (EPA) has produced the following guidance which will be considered in the development of the EIAR for the facility:

- Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, August 2017); and
- Draft Advice Notes for Preparing Environmental Impact Statements (EPA, September 2015).

In addition to these overarching guidance documents for an EIAR, the assessment of each environmental aspect addressed in sections 4 – 13 will also be undertaken with specific consideration to aspect specific guidance and best practice.

The following key stages will form the basis of the assessment process.

- Establishing a baseline of the existing environment on and around the facility;
- Assessment of the environmental impacts and establishing their significance (primarily the assessment of residual impacts once mitigation has been adopted); and
- Formulation of mitigation measures to ameliorate the potential impacts of the facility that cannot be avoided practically through site design.

3.4.1 Baseline Data Collection

The existing environmental baseline for the facility and its surroundings will be established for each environmental aspect under consideration. To date this has been and will continue to be achieved largely through a desktop review of existing data and literature. Additionally, baseline field surveys will be undertaken as required to support the establishment of the baseline.

Given the nature of the expansion project within an existing well-established site, in an immediate area that has seen little development over the last decade, it is anticipated that minimal physical data collection will be required.

3.4.2 Potential Impacts

The assessment will evaluate the construction and operational phases of the facility and the potential impacts will be described. The potential for cumulative impacts to arise will also be considered.

For all environmental aspects, the significance of residual impacts, i.e. those impacts predicted once mitigation is taken account of, will be assessed.

3.4.3 Mitigation Measures

The EIAR will address potential environmental effects associated with the facility and propose mitigation where significant effects are identified. All measures proposed as mitigation for the facility will be reported within the relevant Chapter of the EIAR.

The EIAR will also include a final chapter that contains a Schedule of Environmental Mitigation Measures which will bring together the mitigation measures recommended in the various EIAR Chapters for ease of reference.

3.5 EIAR Structure and Content

The EIAR will be submitted to the EPA to support the licence review for the facility.

Broadly the following key sections will form the content of the EIAR document:

- Introduction
- The Environmental Impact Assessment Process
- Facility Description
- Consideration of Alternatives
- The following environmental topics will be addressed:
    - Population and Human Health;
    - Biodiversity;
    - Soils, Geology and Hydrogeology;
    - Water and Hydrology;
    - Air Quality and Climate;
    - Noise and Vibration:
    - Landscape and Visual;
    - Traffic and Transport;

  - Waste Management; and
  - Archaeology, Cultural Heritage and Architectural Heritage
- Cumulative Impacts and Environmental Interactions

For each of the environmental aspects being assessed, the EIAR chapter will be structured broadly as follows;

- Introduction to the topic area;
- Methodology;
- Baseline conditions;
- Predicted Impacts (construction and operational phases);
- Mitigation Measures;
- Residual Impacts;
- Difficulties Encountered in Compiling Information; and
- Cumulative Impacts and Impact Interrelations.

3.6 Appropriate Assessment

European Sites (Natura 2000), i.e. Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) are classified under the European Union Birds Directive (2009/147EC) and Habitats Directive (92/43/EEC). The procedures that must be followed when considering developments affecting a Natura 2000 site are specified in Articles 6(3) and 6(4) of Habitats Directive.

The EPA themselves initiated an Appropriate Assessment Screening and they concluded *'….an Appropriate Assessment is not required as the project, individually or in combination with other plans or projects, is not likely to have a significant effect on a European site.* Notwithstanding this, and ECIA will be undertaken for the facility to inform the EIAR process.

3.7 Flood Risk Assessment

A Stage 1 Flood Risk Assessment (FRA) will be carried out in accordance with the Office of Public Works Guidelines for Planning Authorities (GPA) 20: The Planning System and Flood Risk Management.

4. Population and Human Health

4.1 Potential Impacts

4.1.1 Potential Construction Phase Impacts

The main construction phase impacts would be associated with the potential nuisance and disturbance caused by construction activities. This would potentially include increases in noise and dust from the construction site and construction traffic on the roads surrounding the facility, resulting in some potential disruption to local people or groups. Such impacts may also result in impact to human health in the vicinity of the facility. There may also be beneficial impacts to the local economy during construction with some increases in local economic activity, with construction staff using local businesses for items such as food and fuel.

4.1.2 Potential Operational Phase Impacts

The facility employs approximately 180 people who work at the facility on a shift basis. In retrofitting / expanding the scope of operations of this facility, impacts would largely be associated with continued and increasing economic activity and security of employment at the plant.

The potential of significant residual impacts (either adverse or beneficial) occurring in relation to population and human health is generally considered low at this stage.

4.2 EIAR Scope

The assessment will comprise of a desk-based analysis of publicly available data, a site visit and review of relevant policies and plans. The following aspects will be considered, and information detailed, where relevant to the facility:

- Population;
- Economic Activity;
- Employment;
- Land Use and Development;
- Commuting Patterns; and
- Tourism, Recreation, and Access.

The significance of impacts on receptors such as primary public services and residential buildings located in proximity to the facility will be assessed.

Human health will be considered as required by Directive 2015/52/EU. This will likely be focused on identifying the environmental topics that have the potential to effect human health and the assessment of those impacts elsewhere within the EIAR. These environmental topics could include the likes of noise and vibration, air quality and traffic.

5. Biodiversity

5.1 Potential Impacts

5.1.1 Potential Construction Phase Impacts

Potential impacts for the construction phase of the facility, in the absence of mitigation would be associated with the:

- loss of habitat due to the footprint of the facility and its construction;
- some potential disturbance of bird, bat or mammal species in close proximity to the facility; and
- the potential spread of invasive species.

It is recognised that the pet food plant is being constructed within the boundary of an already developed facility. The potential of encountering habitats or notable species of ecological value is generally considered low.

5.1.2 Potential Operational Phase Impacts

Potential adverse effects for the operational phase of the facility, in the absence of mitigation have been identified as:

- lighting impacts – disturbance to nocturnal species, including badgers, bats, and birds;
- permanent loss of habitat within the footprint of the facility.

However, generally at this stage, no significant residual impacts on habitats or species are anticipated as a result of the facility.

5.2 EIAR Scope

A field walkover will be undertaken alongside a desk study of available ecological information and relevant plans and policies.

The impact assessment process will involve:

- Identifying any potential habitats or notable species of ecological value;
- Assessing potential direct, indirect and cumulative ecological impacts as a result of the construction and operation of the facility;
- Identifying and characterising potential significant impacts;
- Incorporating measures to avoid and mitigate (reduce) significant impacts where required; and
- Assessing the significance of any residual impacts after mitigation.

As noted in earlier sections, the EPA have screened out the need for Appropriate Assessment – see appendix 1 and this suggests that they consider the potential impact on the ecological environment to be quite benign.

6. Soils, Geology and Hydrogeology

6.1 Potential Impacts

6.1.1 Potential Construction Phase Impacts

Potential impacts associated with the construction phase of the facility may include:

- Loss of soil cover, soil erosion and compaction
- Removal and storage of spoil / overburden;
- Risk of encountering contaminated ground in unknown locations;
- Risk of contamination of existing soils and groundwater by the construction activities such as accidental spills;

6.1.2 Potential Operational Phase Impacts

Potential impacts associated with the operational phase of the facility may include:

- Changes in local surface run-off patterns resulting in local changes to recharge into the soils and bedrock over the operational life of the facility;
- Potential for the permanent loss of localised soils; and
- Potential contamination of soils and groundwater through accidental spillages of fuels or chemicals during operational and/or maintenance works.

The site's WWTP currently discharges (under the EPA licence) to the local stream. It is also connected to the Irish Water sewer system – but this is not in current use. As the EPA are aware, Silver Hill have been working to develop alternative treated water disposal routes. Drip irrigation has been proposed as a viable option. This would use land adjacent to the site in up to 9 or 10 plots each with an area of 1.6ha area. The design flow rate would be 3l/m2/day.

Silver Hill have proposed a pilot project to the EPA and feedback is awaited.

Just before the EIAR process was commenced, Irish Water agreed that the local sewer system can accommodate up to 230m3 of treated WWTP effluent per day in off peak hours (see appendix 2). This disposal route will be considered in the EIAR.

6.2 EIAR Scope

A field walkover will be undertaken alongside a desk study of available information and relevant policies and plans. The assessment will cover potential impacts on soils, geology and hydrogeology and will describe the existing conditions and the likely potential impacts associated with the construction and operation of the facility. The impact assessment process will involve:

- Identifying and characterising the significance of potential impacts;
- Incorporating measures to avoid and mitigate significant impacts where required; and
- Assessing the significance of any residual impacts after mitigation.

The assessment to be carried out will include the following elements:

- Identification of issues relevant to the facility;
- Review of current soil, bedrock and groundwater conditions in the vicinity of the facility;
- Review any potential sensitive receptors relevant to the facility, such as homes and businesses which may use and abstract groundwater in the vicinity;
- Review potentially available site investigation data for works undertaken in the area of the facility;
- Assessment of potential impacts of construction and operational activities on soils, geology and hydrogeology;
- Detailed description and impact assessment of drip irrigation system;
- Incorporating measures to avoid and mitigate (reduce) significant impacts where required; and
- Assessing the significance of any residual impacts after mitigation.

A detailed site assessment review has been undertaken for the drip irrigation system – conducted by Flynn and Shaw in 2016. A total of 15 trial holes were excavated throughout the lands, each to a depth of 1.5m. This report will be used as the basis of impact assessment for this chapter and no further detailed (hydrogeological) modelling is considered required.

7. Water and Hydrology

7.1 Potential Impacts

7.1.1 Potential Construction Phase Impacts

During the construction phase there is the potential for impact on the hydrological environment such as pollution of surface water features through surface water run-off and also flood risk. Sources of pollution include sediment and on-site spillages, which if uncontrolled may flow into local surface water drainage and outfall into the local watercourses.

7.1.2 Potential Operational Phase Impacts

During the operational phase there is the potential for pollution of surface water features through surface water run-off. Sources of pollution associated with the facility would be from potential spills, such as fuel / oil from vehicles on site or spillages from chemical drums. If such substances were allowed to flow into surface water drainage, there is the potential for them to reach nearby surface water bodies. Another potential impact could be flooding risk resulting from increased hardstanding introduced by the facility.

7.2 EIAR Scope

A field walkover will be undertaken alongside a desk study of available information and relevant policies and plans. The assessment will describe the existing water environment and any potential significant impacts associated with the construction and operation of the facility on these aspects.

The impact assessment process will involve:

- A review of drainage plans for surface and waste water at the facility and for the facility;
- Review of the receiving drainage system and existing surface water quality of the receiving environment;
- Inspection of data that may be available relating to surface water quality, such as from the EPA or Local Authority;
- Review of the relevant River Basin Management Plan;
- Identifying and characterising the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) significant impacts (where they occur); and
- Assessing the significance of any residual impacts after mitigation.

Whilst from a preliminary review, no significant impacts to/from flood risk are anticipated, a Stage 1 flood risk assessment (FRA) will be carried out and appended to the EIAR. The FRA will be carried out in accordance with the Office of Public Works (OPW) Guidelines for Planning Authorities (GPA) 20: The Planning System and Flood Risk Management (OPW and Department of Environment, Heritage and Local Government 2009).

8. Air Quality and Climate

8.1 Potential Impacts

8.1.1 Potential Construction Phase Impacts

During the construction phase there is potential for an impact on air quality from the following sources:

- Potential for construction dust emissions and nuisance dust from activities such as excavation, soil movement, soil storage and backfilling. Dust tends to be deposited within 500m of the generation site, and therefore sensitive receptors which fall within this distance of construction activities would be more at risk; and
- Emissions from Heavy Goods Vehicles (HGVs) and on-site construction plant and equipment which may give rise to emissions including; particulates (PM10 and PM2.5), benzene, nitrogen oxides (NOx) and carbon monoxide (CO).

In order to minimise dust emissions during construction, mitigation measures will be included in the EIAR and be implemented during the construction phase of the facility. The appointed contractor will be required to comply with these measures.

8.1.2 Potential Operational Phase Impacts

During the operational phase of the facility, air quality impacts may be associated with emissions from the boilers and from the refrigeration systems. Air emissions may generate quantities of air pollution such as NO_2, CO, benzene and particulate matter (PM_{10} and $PM_{2.5}$) and those associated with refrigerant gases.

It is believed that the processing of offal onsite (in the pet food plant) will reduce the risk of odours as the offal is currently collected on a need to basis. Depending on the production rates this could be daily or every second day. The process will use only fresh offal and there will be very little odour generated. The process will work in tandem with the processing plant so this will ensure fresh product will be readily available every two hours. No material will be processed unless it is fresh.

An odour model will be generated and will assess the potential impact from the development.

8.2 EIAR Scope

The air quality assessment carried out on the facility will include the following elements:

- Identification of air quality issues relevant to the components of the facility, including boilers and refrigerants;
- Assess odour potential from the pet food plant;
- Review of background ambient air quality in the vicinity of the facility (relevant air quality baseline data will be obtained from the EPA and publicly available information);
- Assessment of potential construction related air quality impacts;
- Assessment of potential impacts of plant and equipment processes on air quality;
- Assessment of potential impacts of traffic on ambient air quality;

- Identifying the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) significant impacts (where they occur); and
- Assessing the significance of any residual impacts after mitigation.

The assessment will identify potential sensitive receptors relevant to the facility. Sensitive receptors include locations where people spend significant periods of time, such as domestic properties. Sensitive receptors within the vicinity of the facility may include:

- Residential dwellings;
- Industrial or commercial uses sensitive to dust;
- Recreational areas and sports grounds;
- Schools and other educational establishments;
- Buildings of religious sensitivity;
- Designated ecological area of conservation (either Irish or European designation);
- Hospitals and nursing homes; and
- Offices or Shops.

Given the nature of the expansion project, detailed dispersion modelling of the boilers is not proposed to inform the impact assessment process – but an odour model is proposed.

9. Noise and Vibration

9.1 Potential Impacts

9.1.1 Potential Construction Phase Impacts

The potential construction phase noise and vibration impacts will be associated with the operation of machinery on the site. In addition, there may be some percussive noise generated as a result of the need to break down the concrete slabs existing on part of the site. The actual noise level produced by construction work will vary depending on a number of factors including the type of plant in use, plant location, duration of operation, hours of operation and intervening topography.

Vibration impacts are predicted to be low given the nature of the work to be undertaken.

9.1.2 Potential Operational Phase Impacts

It is anticipated that operational phase noise and vibration impacts would be minimal and would be associated with an expansion to the operation as opposed to new noise sources.

9.2 EIAR Scope

The assessment will cover potential impacts from noise and vibration and will describe the existing conditions and the likely potential impacts associated with the construction and operation of the facility.

The impact assessment process will involve:

- Identifying the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) significant impacts (where they occur); and
- Assessing the significance of any residual impacts after mitigation.

The noise and vibration assessment carried out on the facility will include the following elements:

- Identification of noise and vibration issues relevant to the facility;
- Review of background noise in the vicinity of the facility. A field walkover and noise survey will be undertaken alongside a desk study any relevant baseline information.;
- Assessment of potential noise and vibration impacts resulting from construction activities;
- Assessment of potential impacts of operational phase plant processes on noise and vibration in and around the applicable parts of the facility;
- Assessment of potential impacts of traffic on noise levels in and around the facility.

Given the nature of the expansion project, detailed noise modelling is not proposed to inform the impact assessment process.

The assessment will take account of any Noise Sensitive Locations (NSL's) relevant to the facility. Sensitive receptors will comprise places where it would be reasonable to expect people to be exposed

to local noise and vibrations. The EPA NG4 definition of an NSL will be used in the assessment, as reproduced below:

> *NSL – any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or other facility or other area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels:*

Noise monitoring will be consistent with that gathered as part of the maintenance of the current EPA licence.

10. Landscape and Visual

10.1 Potential Impacts

10.1.1 Potential Construction Phase Impacts

Potential construction phase impacts relevant to the Landscape and Visual Assessment may include;

- Visual impacts from the movement of traffic and machinery to and from the facility and associated ancillary construction requirements i.e. water drainage, power and lighting etc to and from the facility;
- Landscape and visual impacts arising from the movement of construction materials;

10.1.2 Potential Operational Phase Impacts

Potential operational phase impacts relevant to the Landscape and Visual Assessment may include:

- Landscape and visual impacts arising from the presence of new permanent structures at the facility.

The facility is being developed solely within the boundary of an existing well established and developed site. At this stage, no significant residual impacts on the landscape and visual environment are anticipated.

10.2 EIAR Scope

The assessment will include a field walkover undertaken alongside a desk study of available information and relevant policies and plans. The impact assessment process will involve:

- Describing the existing environment (both landscape and visual) taking into account the landscape character assessment published by Monaghan County Council in the County Development Plan 2019-2025;
- Identifying potential landscape and visual issues relevant to the facility;
- Assigning landscape and visual receptor sensitivity;
- Identifying the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) significant impacts (where they occur);
- Assessing the significance of any residual landscape effects and visual effects after mitigation.

Given the nature of the expansion project within the confines of the existing facility, detailed photomontages are not proposed to be developed, to inform the impact assessment process.

11. Traffic and Transport

11.1 Potential Impacts

11.1.1 Potential Construction Phase Impacts

Potential impacts during the construction phase may include:

- An increase in noise and potentially dust generated from construction related traffic may cause some level of disruption;
- An increase in road traffic levels due to construction related activities supplying and accessing the site using the existing road network.

11.1.2 Potential Operational Phase Impacts

Potential impacts during the operational phase may include:

- Increase in traffic levels due to traffic accessing/ egressing the facility.

11.2 EIAR Scope

The assessment will address potential impacts on traffic and transport and will describe the existing conditions and the likely potential impacts associated with the construction and operation of the facility. The impact assessment process will involve:

- Evaluating the facility in relation to all road users including general traffic, HGV's, cyclists and pedestrians;
- Reviewing the future road and public transports proposals in the area surrounding the facility;
- Parking and loading availability at the facility during the construction and operational phases;
- Identifying and characterising the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) any significant impacts (where they occur); and
- Assessing the significance of any residual impacts after mitigation.

A Traffic and Transport Assessment (TTA) will be undertaken as per TII TTA guidelines (2014).

12. Waste Management

12.1 Potential Impacts

12.1.1 Potential Construction Phase Impacts

Potential impacts during the construction phase may include:

- Production of additional waste material, arising from excavation works
- Excavation of possible contaminated lands, which would require disposal off site at a suitably licensed facility;
- Surplus materials and waste may occur where material supply exceeds material demand.

12.1.2 Potential Operational Phase Impact

Wastes generated during the operational phase of the facility are likely to include general waste and wastes produced as a result of the expansion to the production process. The waste streams are typically Category 1 and 3 (offal) animal by-products, fat, WWTP sludge, blood, municipal wastes and organic fertiliser (duck slurry)

The pet food process will have a solid material, a liquid fat and effluent. The effluent volume generated will be in the region of 150 m3 per week or less than 1 m3 per hour to the wastewater treatment plant. The products will be sold converting a waste material into a product.

12.2 EIAR Scope

The assessment will cover the potential impacts of waste generation, describe the existing conditions and the likely potential impacts associated with the construction and operation of the facility. The impact assessment process will involve:

- Review of current and future waste plans and/or requirements relevant to the facility i.e. national and regional waste management policies and objectives;
- Describing the waste streams arising from the construction and operational phase of the facility;
- Review of excavated materials expected to be generated during the construction phase;
- Identifying and characterising the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) any significant impacts (where they occur); and
- Assessing the significance of any residual impacts after mitigation.

13. Archaeololgy, Architectural and Cultural Heritage

13.1 Potential Impacts

13.1.1 Potential Construction Phase Impacts

No significant impacts are currently anticipated upon the cultural heritage resource as a result of the facility. The pet food plant is being developed within the existing facility boundary in an area that has been previously constructed on and developed. Nothing of archaeological or architectural note has been identified to date on site and it is expected that there is low potential for other subsurface unrecorded archaeology to be present. The closest designated heritage asset is approximately 300m north west of the facility. It is described as a Ringfort (ref: MO001-044) in the townland of Knockakirwin.

13.1.2 Potential Operational Phase Impacts

Similar to the construction phase, no significant impacts are currently envisaged as a result of the operational phase of the facility. It is considered unlikely that there would be direct or indirect impacts on cultural heritage given that the development is occurring within the existing site boundary and also accounting for the distance to the closest designated heritage asset.

13.2 EIAR Scope

It is proposed that an assessment of cultural heritage will be carried out in and will be tailored accordingly based on professional judgement and local circumstances.

The assessment will cover potential for impacts on archaeology, architectural and cultural heritage, and will describe the existing conditions and any likely potential impacts associated with the construction and operation of the facility (where relevant). The impact assessment process will involve:

- Undertaking a search of the Record of Monuments and Places (RMPs), Site and Monuments Record (SMR), and National Inventory of Architectural Heritage (NIAH)
- Review of aerial photographic and cartographic sources available online;
- Review of the Excavation Bulletin;
- Identifying and characterising the significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) these any significant impacts (where they occur); and
- Assessing the significance of any residual impacts after mitigation.

14. Consultation

The scoping report will be reviewed and approved by the EPA. The Agency will comment on areas that they suggest require more or less attention than detailed above. The aim would be that when the EIAR is submitted to the EPA as part of the licence review process this will facilitate an efficient review (with minimal amount of further information requests).

Appendix 1 - EPA AA screening

Electronic copy
Mr. Michael Briody
On behalf of Silver Hill Duck

Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

12 September 2019 Reg. No. P0422-03

Re: Appropriate Assessment in respect of a licence review from Silver Hill Duck for an installation located at Silver Hill Duck, Hillcrest, Emyvale, Monaghan.

Dear Sir,

I refer to your application for a licence review in respect of an installation at Hillcrest, Emyvale, Monaghan.

I am to advise you in accordance with Regulation 42(8)(a) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, that the EPA has made a determination that an Appropriate Assessment is not required as the project, individually or in combination with other plans or projects, is not likely to have a significant effect on a European site. Notification of this determination is attached for your reference.

The application and all associated correspondence are available to view on the EPA website at www.epa.ie. You are advised to refer to the website for information on the progress of the application.

If you have any further queries, please contact licensing@epa.ie.

Yours faithfully,

Environmental Licensing Programme
Office of Environmental Sustainability
Tel: 053 – 9160600

Appendix 2 - Letter from Irish Water

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Denise Jordan
Silver Hills Foods
Emyvale
Co. Monaghan

Reg No: P1022-03
Irish Water Reference: S99-PC-12755

16 June 2020

Dear Ms. Jordan,

I refer to your recent correspondence in relation to a proposed trade effluent emission to sewer from your facility at Silver Hills Foods, Emyvale, Co. Monaghan as part of your Industrial Emissions licence review application.

Irish Water have assessed your proposal and could support a discharge of trade effluent with emissions limit values as outlined in Schedule A below and subject to the following conditions:

- A maximum discharge limit of 21m3/hour from Silver Hill Foods to the public sewer would apply between the hours of 20:00 and 7:00 daily, with a total maximum discharge of 230m3 in this period and no shock loading to the public sewer from Silver Hill Foods at any time.

- It would be a requirement to provide two days effluent storage at your premises to control the release of effluent to the Emyvale WWTP and also for additional storage capacity necessary to cater for storm conditions (230m3 x 2 = 460m3 storage volume).

If you have any further queries, please do not hesitate to contact Irish Water.

Yours sincerely

DocuSigned by:
Roman Connolly
Roman Connolly
Wastewater Source Control & Licensing

CC: Trevor Montgomery, Montgomery EHS Limited, Kantoher Business Park, Killeedy, Ballagh, Co. Limerick