

7th January 2022

Ms. Pamela McDonnell
Programme Manager
Environmental Licencing Programme,
Office of Environmental Sustainability,
Johnstown Castle Estate,
Co. Wexford,
Y35 W821

By EDEN

**Re: Response to the EPA's NOTICE in accordance with Regulation 19(2) of the
EPA (Industrial Emission) (Licensing) Regulations 2013 as amended, dated
16 December 2021**

Dear Ms. McDonnell,

Please find attached Connolly's Red Mills response to the EPA's NOTICE in accordance with Regulation 19(2) of the EPA (Industrial Emission) (Licensing) Regulations 2013 as amended, dated 16th December 2021 and items raised in a subsequent remote meeting on the 21st December 2021 with the Agency, Connolly's Red Mills and Malone O'Regan (MOR) Environmental.

We wish to reiterate that we remain fully committed to the IE licence application (P1069-01) and do not intend to abandon this application. We greatly appreciate the fact that the Agency made themselves available at such short notice to meet with us before Christmas as we considered such a meeting was very beneficial for all parties. We trust that the Agency now appreciate that Connolly's Red Mills has not abandoned this licence application.

We very much took on board the points that you communicated to us at our recent meeting and therefore we subsequently decided to defer our plans for the time being for two additional grain dryers in order to concentrate all our efforts on providing the Agency with the necessary information that will allow for a proposed licence determination to be issued in a timely manner. We will therefore be amending the

current planning application just to include for the two proposed grain stores that we hope will be consented and constructed prior to the 2022 harvest season. We will revisit the proposed two additional dryers at a future date on the basis that they could be addressed as part of an amendment to a future licence as you had suggested.

We have attached a technical report prepared by Malone O'Regan, that includes legal advice they obtained from Arthur Cox. Within these documents, clarity is given to the previously submitted documents, current operations onsite, the future proposed works onsite and responses to the items raised during the remote meeting on the 21st of December 2021 and the RFI dated 20th November 2018.

We wish to acknowledge the significant efforts of Malone O'Regan over the past couple of weeks as they have used their best endeavours to support Connolly's Red Mills in addressing as many of the queries raised by the Agency as was practicable. We trust that the Agency will appreciate that in addition to the annual Christmas holiday period, we have also had to deal with the ongoing unprecedented fourth wave of Covid-19 which has significantly impacted on all resources both in Connolly's Red Mills and our consultants. Therefore we have not been able to address all of the queries, but we have provided definitive commitments in regards to the provision of any further outstanding information. We would hope the fact that we met both the November 30th deadline and this deadline despite the aforementioned challenges will instil confidence that all such future deadlines will be met. We therefore respectfully request that the Agency approve the programme of works submitted in the MOR report.

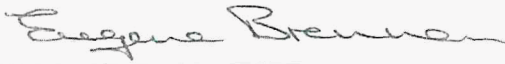
We do fully acknowledge that environmental improvements are required. Connolly's Red Mills are an international company and brand, as such we want all aspects of our operations to be of highest standard including especially our environmental performance. We therefore reiterate our commitment that Connolly's Red Mills are prepared to make significant investments to improve the environmental performance of our facility. In fact a lot of these improvement works are already ongoing in preparation for the IE licence that we hope will be issued. We request that the Agency appreciate that we are not however dealing with a new development on a greenfield site, on the contrary this is historic site with all of the associated challenges. The first mill here was built in the 18th century and much of the site has been unsystematically developed in an unregulated era which complicates rationalising it. Hence we need to make sure that when we are making such investments that they are in the best long term interests for the future viability of the company.

We wish to work closely with the Agency in the coming years following the issuing of a proposed licence. We accept now that some works that we do require for the business like the proposed new dryers must be addressed as part of a future licence review and/or amendment. However it would be important for the viability of the business that the current upgrades works that are ongoing at the Site will be

accounted for in any proposed licence determination that the Agency wish to issue, in order to at least ensure any final licence will reflect site operations at that time.

We trust this is satisfactory to the Agency and we would like to state that both we and our consultants would be happy to meet with the relevant Agency personnel at a time/date of your convenience to clarify any further queries on the report submitted.

Yours sincerely,



EUGENE BRENNAN B.Agr.Sc.
EHS Manager.

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