

ATTACHMENT 1-1 - REASON FOR REQUESTING A REVIEW

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1. Introduction

Licensed pig farm Ballyfaskin Enterprises Ltd EPA License Ref No P0915-01 has recently received planning permission for 1,000 sows and progeny and an electricity supply substation building (22m²). The proposed development did not require an increase in the animal housing area, but rather a reorganisation of the herd within the existing housing. The reason for the development is to upgrade the electricity supply to the farm to facilitate the operation of a mill on site – which will facilitate the formulation of specific diets e.g. low protein diets. The proposal is also to amend the livestock numbers as follows;

Table 1: Licensed, existing and proposed stock numbers

Type of pig	Existing License (A)	Proposed Alteration (B)
Sows	600	1,000
Maiden Gilts	150	166
Boars	10	5
Weaners	3,450	5,357
Production pigs	3,750	3,957

The existing production herd had a specialised market for heavy finisher pigs (130kgs). The change in market conditions has necessitated the move towards more conventional slaughter weights (100 – 110kgs) and the intention is to increase the sow numbers to 1,000 and finish some of the finishers off-site. Hence there will be no increase in the area of housing required.

2. Assessment of Guidance Criteria / questions

In accordance with the EPA Guidance Document ‘*Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity*’ the following questions are addressed;

Does the proposed alteration:

1. Require a new class of activity or process?
Response : No – the class of activity remains unchanged – i.e. Class 6.2: The rearing of pigs in an installation where the capacity exceeds (a) 750 sow places and (b) places for production pigs which are each over 30kgs
2. Cause new/ additional main emission point?

Response : Yes – The main air emission points i.e. the pig houses remain unchanged since grant of licence. The storm water emission receptor is unchanged, however we propose that only SW2 is relevant for future monitoring because the site storm water is now diverted entirely to SW2 (see attachment 3-2 Site Layout plan) and there are no storm water emissions to SW1.

3. Increase the total specified emissions for any emission parameter?

Response : Schedule B of the license for facility P0915-01 sets out the Emission Limits. These are; *'There shall be no emissions to air of environmental significance'*. The license does not specify specific limits and therefore the parameters within the license are not changed.

4. Increase significantly the overall total emissions from the installation/facility

Response : The emissions of significance as measured by the EPA Intensive Agriculture Tool are Ammonia (NH₃), Methane (CH₄) and Nitrous Oxide (N₂O). Odour is also an emission of environmental significance.

Ammonia (NH₃)

NH₃ emissions¹ from the licensed numbers (A in Table 1) and proposed alteration numbers (B in Table 1) are 15.83t and 16.4²t respectively. Therefore the proposed alteration will see NH₃ emissions increase by approx. 4% - with mitigation. If protein is reduced by 3% the NH₃ emissions will fall to 94% of the current licensed levels.

Methane (CH₄) and Nitrous Oxide (N₂O)

CH₄ emissions³ from the licensed numbers and proposed alteration numbers are 95.6t and 124.3t respectively. Therefore the proposed alteration will see CH₄ emissions increase by approx. 30%.

N₂O emissions⁴ from the licensed numbers and proposed alteration numbers are 95.6t and 124.3t respectively. Therefore the proposed alteration will see N₂O emissions increase by approx. 27%.

Odour (Odour Units - o.u.)

Odour emissions⁵ from the licensed numbers, current production numbers and proposed alteration numbers are 119,485 odour units and 119,193⁶ odour units respectively. Therefore the proposed alteration will not change odour emissions significantly.

¹ Assuming 4.7kgs, 3.2kgs, 1kg, 2.6kgs, 3.4kgs and 2.6kgs for suckling sows, dry sows, weaners, finishers, boars and gilts respectively (as per EPA calculation tool)

² Assumes a 20% reduction in the weaner and finisher pig NH₃ production due to 2% reduction in protein in the diet.

³ Assuming 23kgs, 23kgs, 8.7kgs, 13.3kgs, 23kgs and 11.5kgs for suckling sows, dry sows, weaners, finishers, boars and gilts respectively (as per EPA calculation tool)

⁴ Assuming 0.031kgs, 0.031kgs, 0.005kgs, 0.014kgs, 0.025kgs and 0.014kgs for suckling sows, dry sows, weaners, finishers, boars and gilts respectively (as per EPA calculation tool)

⁵ Assuming 18 o.u., 19 o.u., 6 o.u., 22.5 o.u., 20 o.u. and 20 o.u. for suckling sows, dry sows, weaners, finishers, boars and gilts respectively (as per Table 5 of the Odournet UK Report *'Odour Impacts for Intensive Agriculture'*)

⁶ Assumes a 20% reduction in the weaner and finisher odour emissions due to 2% reduction in protein in the diet.

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?

Response : The proposed alteration did require planning permission⁷ for the increase in the number of sows from 600 to 1000 and the construction of a sub-station to provide an upgraded electricity supply to the mill building. However, while the Council advised that it was the Council's view this was probably an intensification and therefore required an EIAR for them to assess the likely impacts, the results of the EIAR is that for the main environmental emissions there was no significant increase from the existing production herd, and other than a new 22m² sub-station building no additional animal housing was required to facilitate the re-configured pig herd.

6. Require the preparation of a Natura Impact Statement (NIS) for consideration by any planning/ public authority?

Response : The proposed alteration did require a NIS and an AA Screening & NIS was submitted with the planning application 19/1135 (copy attached in Attachment 1B)

7. Indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)?

Response : It is the opinion of the applicant that the EPA does not have to conduct an Appropriate Assessment because this has already been conducted and submitted as part of planning application 19/1135; and was therefore available for consideration by Limerick County Council, statutory stake holders and the public.

8. Conflict with BAT as set out in the relevant BAT conclusions?

Response: As can be seen from Attachment 4-7 (BAT Assessment Document) there is no significant conflicts with BAT conclusions for the pig sector.

9. Adversely affects the energy efficiency of the installation/facility?

Response: There is no adverse effects on the energy efficiency of the installation because there is no significant changes in the animal housing (which is well insulated) and the new sub-station will increase energy efficiency.

10. Adversely affects the environmental risk of the installation/facility significantly?

Response: As substantiated in Section 1.6 in the EIAR attached to planning application 19/1135 there are no significant changes in the environmental risks associated with the pig farm. The volume of pig manure stored on site will not change significantly and emissions to air will not increase environmental risks.

11. Cause an increase above the capacity limitations specified in a licence?

Response : The proposed alteration will result in an increase in the capacity limitations as specified in Schedule A of the EPA license. However as Table 1 above shows the production capacity of the 600 sow herd had exceeded the license limit capacity due to genetic improvements and increases in production efficiency in the last decade. For

⁷ Limerick County Council 19/1135 granted on 29/01/2021

example in 2013 the average production per pig was approximately 22 – 24 pigs per sow whereas in 2021 this herd can achieve 27 pigs per sow.

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?

Response: No

13. Involve the incineration or co-incineration of waste

Response: No

3. Conclusions

The proposed alteration;

- **Does not** involve change in the class of licensed facility;
- **Does not** involve an increase in pig housing area;
- **Does not** involve a change in the site boundary or emission points;
- **Does not** involve a change in odour emissions
- NH₃ emissions will rise slightly – but this increase can be offset by reducing the protein by 3% to the growing pigs.
- While CH₄ and N₂O emissions will increase at this site there are no specific emission levels referred to on the license. In the context of national legislation⁸ for NH₃, national pig numbers have not changed significantly and the changes in the sector reflect a concentration of pigs at fewer sites – rather than a significant increase in overall emissions from the pig sector. Methane and Nitrous Oxide emissions are also linked to the total national pig herd size which has not changed significantly over the past decade.
- Limerick County Council requested and EIAR and NIS because of the change from 600 sows to 1,000 sows and the construction of an electricity substation. However, compared to existing numbers, the change to additional sow and reduced numbers of finishers (some of which will be finished off-site) does not represent a significant intensification.
- The proposed alteration **does** involve a change in the pig numbers specified in schedule A1 of the license.

Therefore this assessment concludes that a Licence Amendment is required to Schedule 1 of the License i.e. a change in the number of pigs.

⁸ National Emissions Ceilings (NEC) Directive entered into force on 31/12/2016