

Office of Environmental Sustainability,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

4th May 2022

Re: Mullan Poultry Ltd. P1157-01

Dear Sir/Madame,

I refer to your previous correspondence of 24th March in relation to the aforementioned applicant.

“For the approach outlined in your letter to be applicable in this instance, the part of the development operating below the licensing threshold (referred to in your letter as Phase 1) must have been fully operational prior to the publication of the EPA guidance “Assessment of impact of ammonia & nitrogen on Natura sites on intensive agriculture installations”, i.e. prior to May 2021.

- **Confirm the date of commencement of the poultry rearing activity onsite within the Phase 1 poultry house, and provide documented evidence to support this in the form of dated receipt(s) from the processor of acceptance of broilers for slaughter from this installation.**

With a view to advancing this application for determination, the above mentioned information should be submitted to the EPA within 4 weeks of the date of this notice.”

The applicant is aware of the EPA Guidance referred to which was issued after planning permission was granted and after the applicant had committed to Phase 1 of the development to sub- EPA Licence threshold and understands the Agency’s goals in relation to this guidance.

Notwithstanding same this guidance was issued and effectively brought into practice without any transitional provisions etc. to address situations such as that at hand, i.e. where planning permission had been granted and/or sub-threshold development works commenced. This situation will not arise going forward as local authorities have implemented this guidance from the date of publication.

At this juncture it is the applicant’s opinion that the appropriate threshold to address these circumstances, i.e. where planning permission was granted before the coming into force of this guidance, but where the development was not yet completed, is the sub-threshold level of production, that is permissible in the absence of an I.E. Licence.



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As previously detailed the applicant will upgrade the proposed development to ensure that overall emissions do not exceed this sub-threshold level. Upgrading both houses to low emission specifications would actually reduce emissions below sub-threshold limits and unmitigated levels i.e.

- 40,000 @ 0.08 unmitigated = 3,200 kg ammonia.
- 85,000 @ 0.35 low emission housing specifications = 2,975 kg ammonia

A reduction of a minimum of c.7%.

As a result of the above it would be counter productive, and against the goals of the guidance, not to license a farm in this scenario, whereby the license was securing/providing for a reduction in planned ammonia emissions.

If you require any additional information please contact this office.

Yours faithfully,

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B.Agr.Sc.

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