



## **ENVIRONMENTAL SOLUTIONS LTD**

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17<sup>th</sup> June 2022

Environmental Protection Agency,  
Johnstown Castle Estate  
County Wexford  
Y35 W821.

**Licensee Name:** Woodville Pig Farms Ltd  
**EPA Licence No:** P0467  
**Application Reference No:** LA004791  
**RFI Reference:** Reg 19(2) notice

Dear Sir/Madam

The Regulation 19(2) notice issued by the EPA, dated 26<sup>th</sup> May 2022, cited the following:

*“The responses received by the EPA to date, most recently on 05 May 2022, have been deemed by the EPA to be an inadequate response for the following reasons:*

- *The response proposed a low emission housing system without providing a description of the system, an overview of its technical performance, or an evidence base to support the substantial reduction in ammonia emissions attributed to it.*
- *The modelling of ammonia impacts from the installation contained substantial errors, notably the emission factor used for production pigs.”*

*“WHEREAS the Environmental Protection Agency is of the opinion that this Industrial Emissions License Review Application has been abandoned NOW TAKE NOTICE that you are hereby required to make a submission in writing to the EPA on or before the 22 June 2022 as to why the Licence Review Application should not be regarded as abandoned and FURTHER TAKE NOTICE that after the said date and after considering the submission (if any) made by you pursuant to this notice the EPA may declare that the Licence Review Application shall be regarded as abandoned.”*

A virtual meeting was held on Tuesday 31 May 2022 with Martin O’Looney (PES Ltd), Brian Sheridan (Odour Monitoring Ireland Ltd), Philip Stack (EPA) and Brian Coffey (EPA) in order to gain further detail and clarity on the information required to address the above items.

It was indicated that the proposed low emission housing system or mitigation should be Best Available Technique (BAT), or provide sufficient information to demonstrate that the technology is a BAT equivalent technology.

This issue has been rectified by including the relevant BAT reference for the proposed housing systems, technologies and measures within the revised Air Impact Assessment Report by Odour Monitoring Ireland Ltd. The report references:

Germán Giner Santonja, Konstantinos Georgitzikis, Bianca Maria Scalet, Paolo Montobbio, Serge Roudier, Luis Delgado Sancho; “*Best Available Techniques (BAT) Reference Document for the Intensive Rearing of Poultry or Pigs*”; EUR 28674 EN; doi:10.2760/020485 <https://op.europa.eu/en/publication-detail/-/publication/f673b352-62c0-11e7-b2f2-01aa75ed71a1/language-en>

In relation to the second item, the ‘*substantial errors*’ in the emissions factor used for production pigs was discussed in the meeting.

It was outlined that the Sniffer ER26 Final Report (March 2014), which is the basis for the Simple Calculation of Atmospheric Impact Limits (SCAIL) tool, was used to determine the emissions factor for pigs on the farm. In reviewing this report, it was noted that a typo in the figures presented showed a higher emissions factor with mitigation than without mitigation. A co-author on the paper was contacted to provide the corrected emissions factor.

The EPA stated that this would not be an acceptable basis for the establishment of emissions factors.

This issue has been rectified by using the emissions factors cited for the relevant BAT referenced housing systems, technologies and measures within the revised Air Impact Assessment Report by Odour Monitoring Ireland Ltd.

The EPA also stated that, should dietary amendment be included as a mitigation measure, that the proposed dietary crude protein levels should be cited as this may be the basis for a condition of the revised licence.

Woodville Pig Farms Limited have worked closely with their nutritionists over the years to reduce the protein levels in the pig diets. They have engaged in the progress that has been made by the Irish pig sector on nutritional improvements over the years.

The diets to be used at Woodville Pig Farm will have the following maximum crude protein levels:

Diet Type	% Crude Protein
Dry Sow	14.5
Lactating Sow	18.5
Weaner Ration	18.0
Finisher Ration	16.5

This submission is accompanied by the following revised reports:

- 20062022 Woodville Farm Piggery Odour Impact Assessment Ver 6
- Natura Impact Statement \_Woodville Pig Farms Ltd\_21341

Licensee Name: Woodville Pig Farms Ltd  
EPA Licence No: P0467

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RFI Reference:

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Yours faithfully

A handwritten signature in black ink, appearing to read "Martin O'Looney", with a large, stylized flourish underneath the name.

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