

Mr Eoin McCaffery
Inspector Level II
Environmental Licencing Programme,
Office of Environmental Sustainability,
Johnstown Castle Estate,
Co. Wexford,
Y35 W821

By EDEN

RE: William Connolly & Sons Unlimited Company, Grange Lower, Goresbridge, Kilkenny, R95 EKH4, IE Licence Reg No. P1069-01

Dear Eoin,

Connolly's Red Mills would like to re-iterate to the EPA that any restriction on operating hours for either the dryers or the Feed Mill imposed in an IE licence will effectively mean that the business will be unviable and will have to close down. It is not possible to operate this business sporadically. The reasons for this were previously outlined in the following documentation submitted to the Agency:

- MOR Cover Letter submitted via Eden on 30th November 2021, explained the nature of the business, seasonality of the harvest and dryers, weather dependency and other factors that impact on the operational hours of this business.
- MOR report entitled 'Additional Technical Information', dated 7th January 2022, page 9, section 5.4 provided details on the operating regimes for two modelling assessments, as well as a discussion on actual operating conditions and unpredictability of those operations.
- Updated Non-Technical Summary submitted on 31st March 2022, page 2 section 1.5, stated the required operating hours for both the Mill and the Dryers.
- MOR 'Air Dispersion Modelling Report – Additional and Refined Scenarios' dated 31st March 2022, pg. 11, section 4.3 explained why typical operating regime was modelled – as an example of a realistic operating regime, rather than the 24/7 operating regime presented in the original Air Dispersion Modelling report. However as was clearly stated this was just included to illustrate to the Agency as an example of typical operating hours at the facility.

Although the pertinent reasons had been communicated previously, it is really important that the Agency fully understand that it would not be practicable for the facility to operate based on restricted hours given the unpredictability of demand for animal feed. Some reasons for this position are presented below:

- Energy Restrictions – if the government impose energy restrictions on businesses, we will need an ability to manufacture 24 / 7 / 365 at reduced loads to meet the demands of our customers not withstanding any weather or seasonality events.
- We are a primary producer and are dependent on nature in an inclement climate. This necessitates an ability to manage our business with flexibility, efficiency and competitiveness using the best available techniques.
- We are an essential part of the food chain. In our quality control process, we dry and store on site raw materials supplied direct from farm i.e. the harvest which is totally dependent on the climate (harsh winter/spring and wet or dry summer). These inputs are either sold directly, and or processed into animal feeds stuff as part of the food chain – Dairy, Beef, Poultry, Sheep and Pig. Ireland is an exporter of food and food ingredients, the demand for these products is all year round. The impact of our inclement climate drives the seasonality of the business. Currently, the high temperatures have already impacted heavily the growth of grass, thus necessitating the need to supplement the diet of animals. Volumes of animal feed needed to feed herds across the country has spiked demand. Equally, a harsh winter also drives demand and again our ability to react and remain competitive in the market. Each year the climate presents different challenges. As a result seasonality is varied depending on rainfall, sunshine and frost in addition to storms and droughts which are influenced by nature.
- We have a duty of care to our customers who are primary producers. The health and welfare of their animals is directly proportional to our ability to supply our products given the seasonality of the climate and the demand on their produce.
- We were declared an Essential Service throughout Covid – part of the Food Chain and Health and Welfare of animals.
- Export Driven – we export products to both the Northern and Southern Hemisphere. This requires an ability to meet the demands of the markets throughout the year. Any restrictions will directly impact our efficient running of the plant and therefore our competitiveness internationally. We are selling Irish produce which is seen as high quality, clean green food however price remains a crucial factor. While we are making every effort using the best available techniques, this will be severely impacted by restrictions.
- Climate Change - We now seem to be experiencing more extreme weather and climate change events e.g. droughts, flooding etc. In such circumstances normal sources of animal feed, e.g. grass and forage, can become unavailable or severely restricted in supply. This leads to increased demand for compound animal feed and we must be able to respond to these additional customer demands, sometimes at very short notice
- Food Security is now an important issue given the current situation with global supply chains, skills and labour shortages, plant and equipment breakdowns and the war in Ukraine. The ability to retain the flexibility to respond to increased demand domestically and internationally is more important than ever in these circumstances
- Rural employment – Over 350 people are employed by the company with 150 within a 50 mile radius. Loss of competitiveness or an ability to process products will directly impact the business and countless suppliers in the country.

These reasons illustrate how the operations at Red Mills are totally dependent on the weather which in Ireland is very unpredictable, especially with onset of climate change. No restriction on operating hours can be justified. It is not risk based and if it is imposed, we will unfortunately have no option but to challenge such a decision. We clearly do not want to be in that situation, hence the reason why we are issuing this correspondence to the Agency at this juncture.

It should be re-iterated that air dispersion modelling is a predictive tool, and it not a conclusive proof that any air quality impact has occurred or will occur. For AQS exceedances shown in

the model the following would have to coincide: specific weather condition AND all 48 emissions points at the Site running at maximum load AND at maximum emission rates. This scenario will not occur, and even if it does, the model predicts any impact would be limited to a narrow strip of land along the site boundary in an agricultural field - therefore no impact on human health has been predicted. The model used was extremely conservative and therefore was a significant overestimate as it was considered that total dust equates to PM10, as no data is available on speciation of emitted dust. Impact of that overestimate was demonstrated in the MOR RFI Response dated 2nd June 2022, Appendix B.

As the initial air dispersion modelling (completed in November 2021) predicted air quality impact when all emissions running 24/7, the EPA requested modelling of a typical operating scenario (refer to March 2022 report) with an objective of demonstrating that in a typical operating scenario, no impact on air quality would be predicted. This objective was clearly met. Regardless, in order to cover a rare scenario where more intensive operations may be required and also to futureproof the plant, mitigation measures were proposed involving alterations to stacks and filters for Feed Mill sources. These alterations were modelled in Scenario 3 (refer to 'Air Dispersion Modelling Report – Additional and Refined Scenarios' dated 31st March 2022), which proved that these alterations will result in drastic improvements, i.e. very significant reduction in emissions and ground-level concentrations.

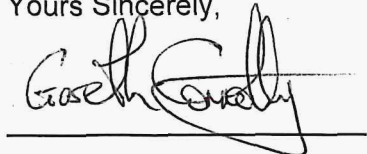
These mitigation measures will be very costly to implement, however, will result in very significant environmental benefits and therefore Red Mills considers these as an investment beneficial to the environment as well as their business. Red Mills have already made a substantial investment by completing a feasibility study and preliminary design. These mitigation measures can be implemented either through a Planning Permission, which will take minimum 5-6 months to obtain, or can be conditioned in the future IEL, in which case these would be classified as exempt development as per section 86(8) of the EPA Act 1992 (refer to our Eden submission dated 29th July 2022). Naturally the latter option is more desirable for Red Mills and for the environment.

Red Mills are also actively pursuing options of acquiring additional lands so their site boundaries would be extended to ensure regardless of the circumstances that there would be no exceedances beyond their site boundary.

In summary, Red Mills have already invested significant costs and resources to meet every request made by Agency. The company is committed to making significant further investment over the next couple of years to improve the air emissions at the facility. We are actually inviting the Agency to condition these improvement works so there would be a legal obligation to complete these works. We consider that this would be a far more sensible approach than imposing conditions that would limit the number of operational hours that would basically put the company out of business, given the sector we operate in.

We respectfully request that Agency consider this submission, prior to making any final decision on the proposed licence determination for the facility.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Gareth Connolly', written over a horizontal line.

GARETH CONNOLLY
CEO