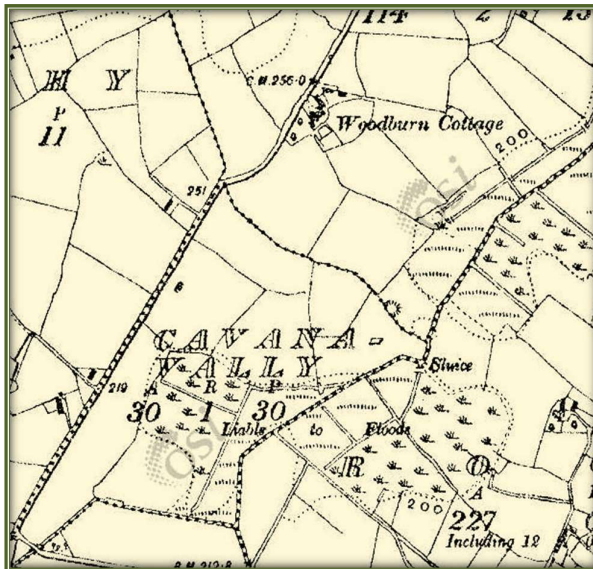


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**NATURA IMPACT STATEMENT OF AN APPLICATION FOR A
LICENCE AT KILNAMADDY, NEWBLISS, CO MONAGHAN
(EPA LICENSE APPLICATION NO. P1175-01)**



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August 2022

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1 INTRODUCTION

1.1 REQUIREMENT FOR AN APPROPRIATE ASSESSMENT

This Natura Impact Assessment was prepared to accompany an EPA License for a poultry farm at Kilnamaddy, Newbliss, Co. Monaghan. It followed on from an Appropriate Assessment Screening Determination made by the EPA in August 2022 regarding this License application.

Having regard to the location of the application site and its proximity to certain sites designated under the Natura 2000 network, an Appropriate Assessment of the proposed development was prepared in accordance with Article 6 of the Habitats Directive.

The purpose of the assessment is to determine the appropriateness of the proposed project, in the context of the conservation status of the site or sites. In Ireland, an Appropriate Assessment takes the form of a Natura Impact Statement (NIS), which is a statement of the likely impacts of the plan or project on a Natura 2000 site. The NIS comprises a comprehensive ecological impact assessment of the plan or project and it examines the direct and indirect impacts that the plan or project might have on its own or in combination with other plans or projects on one or more Natura 2000 sites in view of the sites' conservation objectives.

1.2 THE AIM OF THIS REPORT

This Natura Impact Statement (NIS) has been prepared in accordance with the current guidance (DoEHLG, 2009, Revised February 2010), and it provides an assessment of the potential impacts of the atmospheric emissions from a poultry farm at Kilnamaddy, Newbliss, Co. Monaghan on designated European sites.

An NIS should provide the information required in order to establish whether or not a proposed development is likely to have a significant impact on certain Natura sites in the context of their conservation objectives and specifically on the habitats and species for which the Natura 2000 conservation sites have been designated.

Accordingly, a comprehensive assessment of the ecological impacts of this application was carried out in August 2022 by Noreen McLoughlin, MSc, MCIEEM of Whitehill Environmental. This assessment allowed areas of potential ecological value and potential ecological constraints associated with this proposed development to be identified and it also enabled

potential ecological impacts associated with the proposed development to be assessed and mitigated for.

1.3 REGULATORY CONTEXT

RELEVANT LEGISLATION

The Birds Directive (Council Directive 2009/147/EC) recognises that certain species of birds should be subject to special conservation measures concerning their habitats. The Directive requires that Member States take measures to classify the most suitable areas as Special Protection Areas (SPAs) for the conservation of bird species listed in Annex 1 of the Directive. SPAs are selected for bird species (listed in Annex I of the Birds Directive), that are regularly occurring populations of migratory bird species and the SPA areas are of international importance for these migratory birds.

The EU Habitats Directive (92/43/EEC) requires that Member States designate and ensure that particular protection is given to sites (Special Areas of Conservation) which are made up of or support particular habitats and species listed in annexes to this Directive.

Articles 6(3) and 6(4) of this Directive also call for the undertaking of an Appropriate Assessment for plans and projects not directly connected with or necessary to the management of, but which are likely to have a significant effect on any European designated sites (i.e. SACs and SPAs).

The Water Framework Directive (WFD) (2000/60/EC), which came into force in December 2000, establishes a framework for community action in the field of water policy. The WFD was transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. 722 of 2003). The WFD rationalises and updates existing legislation and provides for water management on the basis of River Basin Districts (RBDs). RBDs are essentially administrative areas for coordinated water management and are comprised of multiple river basins (or catchments), with cross-border basins (i.e. those covering the territory of more than one Member State) assigned to an international RBD. The aim of the WFD is to ensure that waters achieve at least good status by 2027 and that status does not deteriorate in any waters.

Appropriate Assessment and the Habitats Directive

Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora – the ‘Habitats Directive’ - provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of European Community interest, at a favourable conservation status. Articles 3 - 9

provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as *Natura 2000*. Natura 2000 sites are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC).

Articles 6(3) and 6(4) of the Habitats Directive sets out the decision-making tests for plans or projects affecting Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

Article 6(4) deals with the steps that should be taken when it is determined, as a result of appropriate assessment, that a plan/project will adversely affect a European site. Issues dealing with alternative solutions, imperative reasons of overriding public interest and compensatory measures need to be addressed in this case.

Article 6(4) states:

“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.”

The Appropriate Assessment Process

The aim of Appropriate Assessment is to assess the implications of a proposal in respect of a designated site's conservation objectives.

The 'Appropriate Assessment' itself is an assessment which must be carried out by the competent authority which confirms whether the plan or project in combination with other plans and projects will have an adverse impact on the integrity of a European site.

Screening for Appropriate Assessment shall be carried out by the competent authority as set out in Section 177U(1) and (2) of the Planning and Development Act 2000 (as amended) as follows:

(1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

(2) A competent authority shall carry out a screening for appropriate assessment under subsection (1) before—

(a) a Land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made, or

(b) consent for a proposed development is given.'

The competent authority shall determine that an Appropriate Assessment is not required if it can be excluded, that the proposed development, individually or in combination with other plans or project will have a significant effect on a European site.

Where the competent authority cannot exclude the potential for a significant effect on a European site, an Appropriate Assessment shall be deemed required.

Where an Appropriate Assessment is required, the conclusions of the Appropriate Assessment Report (Natura Impact Statement (NIS)) should enable the competent authority to ascertain whether the plan or proposed development would adversely affect the integrity of the European site. If adverse impacts on the integrity of a European site cannot be avoided,

then mitigation measures should be applied during the appropriate assessment process to the point where no adverse impacts on the site remain. Under the terms of the Habitats Directive consent can only be granted for a project if, as a result of the appropriate assessment either (a) it is concluded that the integrity of any European sites will not be adversely affected, or (b) after mitigation, where adverse impacts cannot be excluded, there is shown to be an absence of alternative solutions, and there exists imperative reasons of overriding public interest for the project should go ahead.

Section 177(V) of the Planning and Development Act 2000 (as amended) outlines that the competent authority shall carry out the Appropriate Assessment, taking into account the Natura Impact Statement (amongst any other additional or supplemental information). A determination shall then be made by the competent authority in line with the requirements of Article 6(3) of the Habitats Directive as to whether the plan or proposed development would adversely affect the integrity of a European site, prior to consent being given.

2 METHODOLOGY

2.1 APPROPRIATE ASSESSMENT

This NIS has been prepared with reference to the following:

- European Commission (2018). Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.
- European Commission (2021). Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
- European Commission (2006). Nature and Biodiversity Cases: Ruling of the European Court of Justice.
- European Commission (2007). Clarification of the Concepts of: Alternative Solution, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission.
- Department of Environment, Heritage and Local Government (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.

The EC Guidance sets out a number of principles as to how to approach decision making during the process. The primary one is 'the precautionary principle' which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty.

When considering the precautionary principle, the emphasis for assessment should be on objectively demonstrating with supporting evidence that:

- There will be no significant effects on a Natura 2000 site;
- There will be no adverse effects on the integrity of a Natura 2000 site;
- There is an absence of alternatives to the project or plan that is likely to have an adverse effect to the integrity of a Natura 2000 site; and
- There are compensation measures that maintain or enhance the overall coherence of Natura 2000.

This translates into a four stage process to assess the impacts, on a designated site or species, of a policy or proposal.

The EC Guidance states that "each stage determines whether a further stage in the process is required". Consequently, the Council may not need to proceed through all four stages in undertaking the Appropriate Assessment.

The four-stage process is:

Stage 1: Screening – The process which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether or not these impacts are likely to be significant;

Stage 2: Appropriate Assessment – The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts;

Stage 3: Assessment of Alternative Solutions – The process which examines alternative ways of achieving objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site;

Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain – An assessment of the compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

In complying with the obligations set out in Articles 6(3) and following the guidelines described above, this screening statement has been structured as a stage by stage approach as follows:

- Description of the proposed project;
- Identification of the Natura 2000 sites close to the proposed development;
- Identification and description of any individual and cumulative impacts on the Natura 2000 sites likely to result from the project;
- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects;
- Description of proven mitigation measures.

2.2 STATEMENT OF COMPETENCY

This NIS report was carried out by Noreen McLoughlin, BA, MSc, MCIEEM. Noreen has an honours degree in Zoology and an MSc in Freshwater Ecology from Trinity College, Dublin and she has been a full member of the Chartered Institute of Ecology and Environmental Management for over fifteen years. Noreen has over 17 years' experience as a professional ecologist in Ireland.

2.3 DESK STUDIES & CONSULTATION

Information on the site and the area of the proposed development was studied prior to the completion of this statement. The following data sources were accessed in order to complete a thorough examination of potential impacts:

- National Parks and Wildlife Service - Aerial photographs and maps of designated sites, information on habitats and species within these sites and information on protected plant or animal species, conservation objectives, site synopses and standard data forms for relevant designated sites.
- Environmental Protection Agency (EPA)- Information pertaining to water quality, geology and licensed facilities within the area, correspondence from the EPA regarding this License application;
- Myplan.ie – Mapped based information;
- National Biodiversity Data Centre (NBDC) – Information pertaining to protected plant and animal species within the study area;
- CLW Environmental Planners – Site plans, development description and information on potential emissions.
- Monaghan County Council – Information on planning history in the area for the assessment of cumulative impacts.

2.4 ASSESSMENT METHODOLOGY

The proposed development was assessed to identify its potential ecological impacts and from this, the Zone of Influence (Zol) of the proposed development was defined. Based on the potential impacts and their Zol, the Natura 2000 sites potentially at risk from direct, indirect or in-combination impacts were identified. The assessment considered all potential impact sources and pathways connecting the proposed development to Natura 2000 sites, in view of the conservation objectives supporting the favourable conservation condition of the site's Qualifying Interests (QIs) or Special Conservation Interests (SCIs).

The conservation objectives relating to each Natura 2000 site and its QIs/SCIs are cited generally for SACs as “to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or Annex II species for which the SAC has been selected”, and for SPAs “to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA”.

As defined in the Habitat’s Directive, the favourable conservation status of a habitat is achieved when:

- Its natural range and area it covers within that range is stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future;

The favourable conservation status of a species is achieved when:

- The population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future;
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Where site-specific conservation objectives (SSCOs) have been prepared for a European site, these include a series of specific attributes and targets against which effects on conservation condition, or integrity, can be measured. Where potential significant effects are identified, then these SSCO should be considered in detail.

3 DESCRIPTION OF THE PROPOSED PROJECT

3.1 PROJECT DESCRIPTION

OVERVIEW

In 2021, Monaghan County Council granted planning permission to Woodburn Farms Ltd for the alterations of operations at an existing poultry farm in Kilnamaddy, Newbliss, Co. Monaghan. The existing poultry farm currently facilitates the housing of 26,000 pullets and 9,500 hens. The planned re-alignment of activities will concentrate on pullet rearing only and the proposed stock numbers will include 60,000 pullets. The proposed changes will result in a decrease in ammonia emissions from the farm from 4,315kg ammonia to 3,600kg, i.e., a 17.25% reduction. The operation of the farm and all its associated activities will be done in accordance with S.I. 113 of 2022.

The applicant is now seeking a License from the EPA for the operation of this farm (License Registration Number P1175-01).

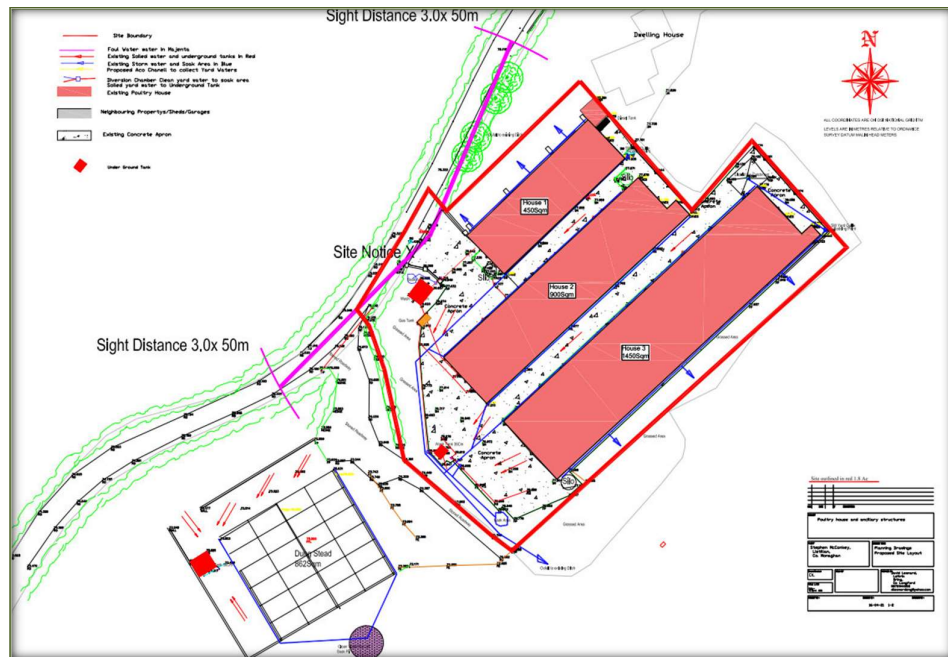


Figure 1 – Proposed Site Plan (as prepared by David Leonard)

Automated feeding and drinking systems will be incorporated into the house operation. The poultry manure will be stored in a manure store adjacent to the poultry house. Soiled water from the proposed development will be collected in dedicated soiled water collection tanks. The cycle length for the birds is typically 15-17 weeks, after which the birds are removed from

the house, the house is cleaned and disinfected and left ready for the incoming pullets. There will be 2.5 cycles per annum.

The main outputs of the proposed development will be pullets and poultry manure.

The spent poultry litter and manure will be removed from the farm by specialised contractors where it will be transported to customer farmers for use as a fertiliser on their lands. The wash water produced from the houses will be spread on lands owned / leased by the applicants. This will be used in accordance with S.I. 113 of 2022. All records for the movement of fertiliser will be kept on site and presented to the Department of Agriculture, Food and Marine as requested.

S.I. 113 OF 2022

The European Union (Good Agricultural Practice for Protection of Waters) Regulations 2022 provides a basic set of measures to ensure the protection of waters, including drinking water sources, against pollution caused by nitrogen and phosphorus from agricultural sources, with the primary emphasis being on the management of livestock manures and other fertilisers. This directive outlines measures that must be followed during the land-spreading of manure. These measures are summarised in the points below.

- Livestock manure or slurry containing more than 170kg per hectare in a year must not be spread.
- The spreading of any organic fertiliser during certain times of the year is prohibited (The prohibited spreading period, generally between Mid-October and Mid-January).
- Farmers must keep within the overall maximum fertilisation rates for nitrogen and phosphorus.
- Farmers must have sufficient storage capacity to meet the minimum requirements of the regulations.
- All storage facilities must be kept leak proof and structurally sound.
- Records for the movement of fertilisers
- Chemical fertilisers, livestock manure and other organic fertilisers, effluents and soiled water must be spread as accurately and as evenly as possible.
- An upward-facing splash plate or sludge irrigator on a tanker or umbilical system must not be used for the spreading of organic fertiliser or soiled water.
- Chemical fertilisers, livestock manure, soiled water or other organic fertilisers must not be spread when:
 - The land is waterlogged;

- The land is flooded, or it is likely to flood;
 - The land is frozen, or covered with snow;
 - Heavy rain is forecast within 48 hours;
 - The ground slopes steeply and there is a risk of water pollution, when factors such as surface run-off pathways, the presence of land drains, the absence of hedgerows to mitigate surface flow, soil condition and ground cover are taken into account.
- Chemical fertilisers must not be spread on land within 2 metres of a surface watercourse.

Table 1 shows the buffer zones for various water bodies (lakes, rivers, wells etc.). Soiled water, effluents, farmyard manures or other organic fertilisers must not be spread inside these buffer zones.

Water Feature	Buffer Zone
Any water supply source providing 100m ³ or more of water per day, or serving 500 or more people	200m (or as little as 30m where a local authority allow)
Any water supply source providing 10m ³ or more of water per day, or serving 50 people or more	100m (or as little as 30m where a local authority allows)
Any other water supply for human consumption	25m (or as little as 15m where a local authority allows)
Lake shoreline or turlough likely to flood	20m
Exposed cavernous or karstified limestones features	15m
Any surface watercourse where the slope towards the watercourse exceeds 10%	10m
Any other surface waters	5m

Table 1 – Requirements for the Application of Fertilisers and Soiled Water as set out in S.I. 113 of 2022.

Prior to its approval, a Natura Impact Statement was prepared for the Nitrates Action Programme (NAP) by RPS (2022). This Natura Impact Statement considered the potential of the measures proposed within the NAP to give rise to adverse effects on the integrity of European Sites, with regard to their qualifying interests, associated conservation status and the overall site integrity, alone and in combination with other relevant plans and programmes. The NIS concluded that the adoption of the NAP will not adversely affect the integrity of any European Site either alone or in combination with other relevant plans or programmes and subject to securing the mitigation measures prescribed in the NIS.

The applicant is fully aware of his obligations under S.I. 113 of 2022 and he will meet all the requirements under this Directive with the proposed application.

3.2 SITE LOCATION AND SURROUNDING ENVIRONMENT

The site in question is approximately 0.7 hectares and it is located in a rural area, in the townland of Kilnamaddy. Access to the site will be via an existing entrance into the farm and this is located just off a local, third-class road. The site is 3.9km north of Newbliss and 4km south-west of Smithborough.

The dominant land-use surrounding the application site is agriculture and improved agricultural grassland is the dominant habitat locally. Other natural habitats represented locally include areas of wet grasslands, heathland, scrub, hedgerows, treelines and watercourses. Site location maps can be seen in Figures 2 and 3 whilst an aerial photograph of the site and its surrounding habitats can be seen in Figure 4.

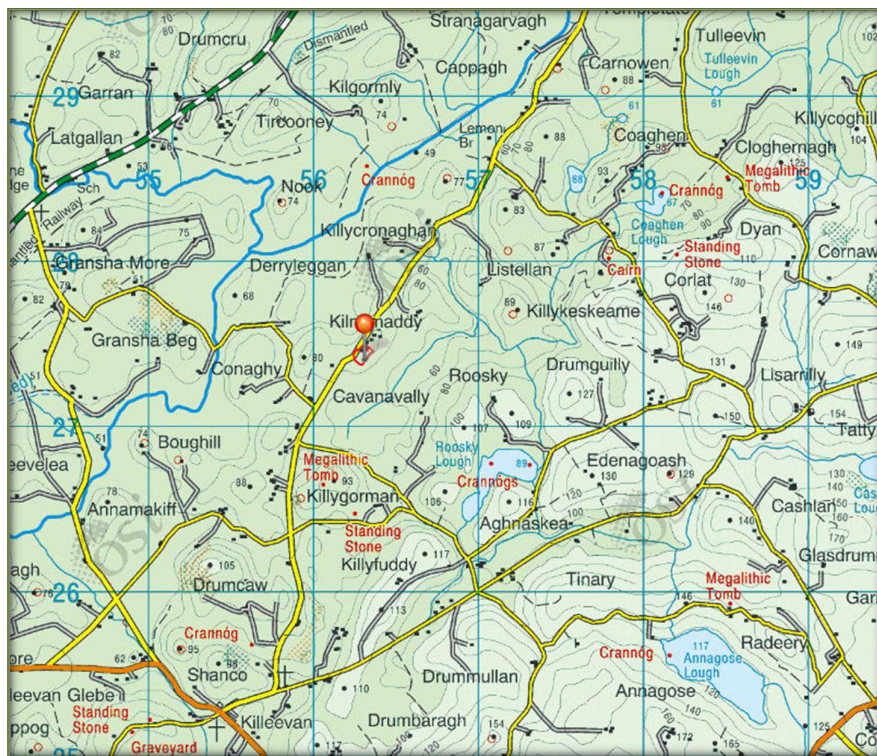


Figure 2 – Map showing the Location of the Proposed Development Site (Pinned)

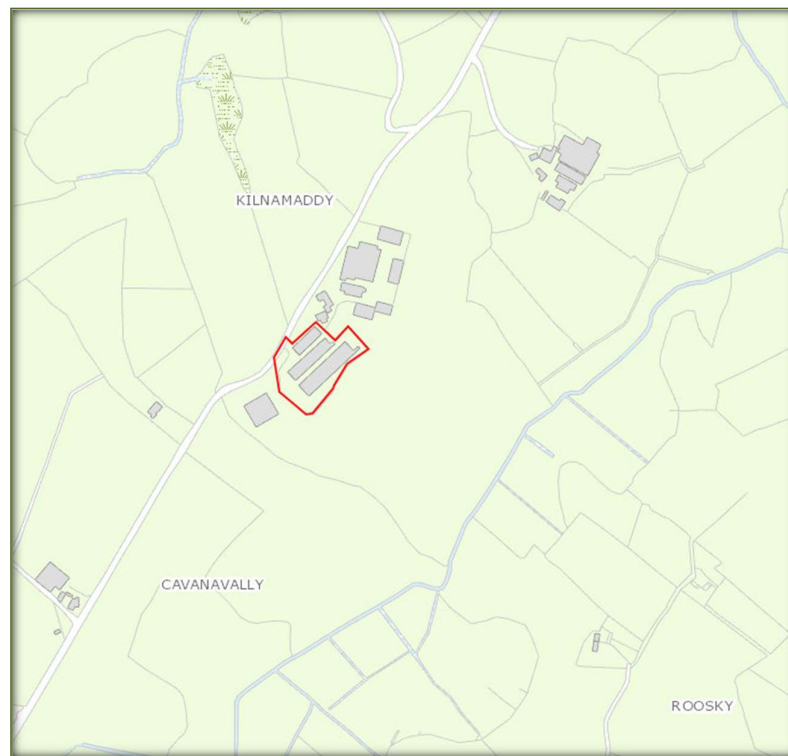


Figure 3 – Map showing the Location of the Proposed Development Site (Outlined in Red)

HABITATS AND SPECIES

The dominant habitat within the application site currently is buildings and artificial surfaces, i.e., the existing poultry houses. There are also some pockets of grassland present around the houses. There are no natural boundaries around the site.

An examination of the website of the National Biodiversity Data Centre revealed that there are no records for the presence of any notable mammal species from within the relevant one km grid square (H5627) of this proposed development.

WATER FEATURES AND QUALITY

The application site lies within the Erne Hydrometric Area and Catchment, and the Finn (Monaghan) Sub-Catchment and Sub-Basin. There are a number of drains close to the application site, and clean surface water from the site is being directed into these drains. These drain towards the Nook Stream, which is 228m south-east of the application site. This stream flows north / north-west / west until its confluence with the River Finn, at a point approximately 870m north-west of the application site.

The EPA have defined the ecological status of the Nook Stream and the River Finn as moderate. Under the requirements of the Water Framework Directive in Ireland, this is unsatisfactory and all watercourses are obliged to meet achieve good ecological status within a specified time frame (2021).



Figure 4 – Aerial Photograph of the Site (Outlined in Red) and its Surrounding Habitats.

3.3 NATURA 2000 SITES IDENTIFIED

There are six Natura 2000 designated sites within 15km of the application site. These sites are summarised in Table 2 and a map showing their locations relative to the application site is shown in Figure 5. A full description of the sites can be read on the website of the National Parks and Wildlife Service (www.npws.ie) and the Joint Nature Conservation Committee (jncc.defra.gov.uk).

Site Name & Code	Distance	Qualifying Interests	Potential Impacts
Magheraveely Mark Loughs SAC UK0016621	5.1km north-west	<ul style="list-style-type: none"> • Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp. • Calcareous fens with <i>Cladium mariscus</i> and species of the Caricion <i>davallianae</i> • Alkaline fens • <i>Austropotamobius pallipes</i> (White-clawed Crayfish) 	<i>Significant effects arising from emissions will be considered further.</i>
Kilroosky Lough Cluster SAC 001786	6.1km west	<ul style="list-style-type: none"> • Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp. • Calcareous fens with <i>Cladium mariscus</i> and species of the Caricion <i>davallianae</i> • Alkaline fens • <i>Austropotamobius pallipes</i> (White-clawed Crayfish) 	<i>Significant effects arising from emissions will be considered further.</i>
Upper Lough Erne SPA UK9020071	10.6km	<ul style="list-style-type: none"> • Whooper Swan <i>Cygnus cygnus</i> 	<i>Significant effects arising from emissions will be considered further.</i>
Slieve Beagh SPA 004167	11.4km north	<ul style="list-style-type: none"> • Hen Harrier <i>Circus cyaneus</i> 	<i>Significant effects arising from emissions will be considered further.</i>
Slieve Beagh-Mullaghfad-Lisnaskea SPA UK9020302	11.5km north-west	<ul style="list-style-type: none"> • Hen Harrier <i>Circus cyaneus</i> 	<i>Significant effects arising from emissions will be considered further.</i>
Slieve Beagh SAC UK0016622	14.9km north	<ul style="list-style-type: none"> • Natural dystrophic lakes and ponds • European dry heaths • Blanket bogs 	<i>Significant effects arising from emissions will be considered further.</i>

Table 2 – Natura 2000 Sites within 15km of Application Site

The generic conservation objectives of these sites are:

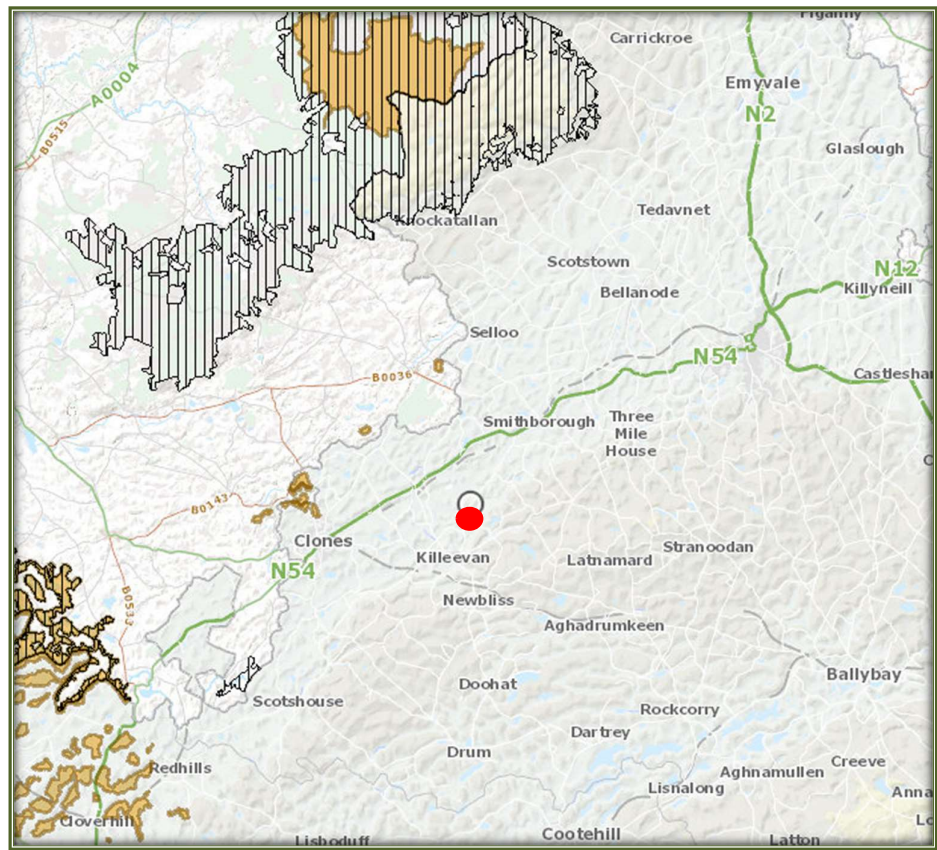


Figure 5 – The Application Site (Red Dot) in relation to the Natura 2000 sites. SACs – Brown Hatching, Hatching, SPAs – Vertical Hatching

4 IDENTIFICATION AND ASSESSMENT OF POTENTIAL IMPACTS

4.1 INTRODUCTION

An Appropriate Assessment Screening undertaken by the EPA (17/8/2022) identified the following potential impacts:

- *Air emissions of ammonia (and associated nitrogen deposition) from the installation have the potential for effects on qualifying interest habitats and species in the European Sites listed above due to their proximity to the installation.*
- *The closest European sites, Magheraveely Marl Loughs N.I. SAC and Kilroosky Lough Cluster SAC, are within 10km of the installation boundary. Alkaline fens [7230] which are particularly sensitive to ammonia are listed as qualifying interests in the Conservation Objectives documents for both of these European Sites. Information in relation to European Sites is available on www.npws.ie and www.daera-ni.gov.uk/.*
- *Regard has been had to the EPA's Licence Application Guidance (Assessment of the Impact of Ammonia and Nitrogen on Natura 2000 Sites from Intensive Agriculture Installations, Version 1, May 2021) and the online screening tool SCAIL Agriculture as part of this Appropriate Assessment Screening Determination.*
- *Taking all of the foregoing into account it is considered that significant effects on European Sites and their qualifying interests due to emissions to air from the installation cannot be ruled out at the screening stage and based on the precautionary principle this determination is that a Stage 2 Appropriate Assessment is required.*

Significant Effects on Natura 2000 sites arising from Atmospheric Emissions

The EPA have recently produced guidance documents for the assessment of impacts of emissions on Natura 2000 sites (*Assessment of the Impact of Ammonia and Nitrogen on Natura 2000 sites from Intensive Agriculture Installations, EPA 2021*). This document contains a step-by-step assessment process which allows the applicant to ascertain the level of assessment and information needed when determining potential effects from emissions on Natura 2000 sites. Step 6c of the flow chart (Figure 6) makes a provision for applicants to demonstrate that the emissions from the new installations will result in an overall reduction in emissions from the baseline numbers.

The proposed development consists of the re-alignment of activities on the farm to concentrate on pullet rearing only, with a proposed stock level of 60,000. This re-alignment will result in an overall reduction in emissions from the farm, from 4,315kg ammonia to 3,600kg, i.e., a 17.25% reduction.

As the final emissions from the farm upon completion of the total development will be lower than the current baseline levels, detailed atmospheric modelling is not required in this instance. It can be concluded that the proposed application will have no significant effects upon any European site by virtue of emissions to the atmosphere.

Annex 1: Flow Chart

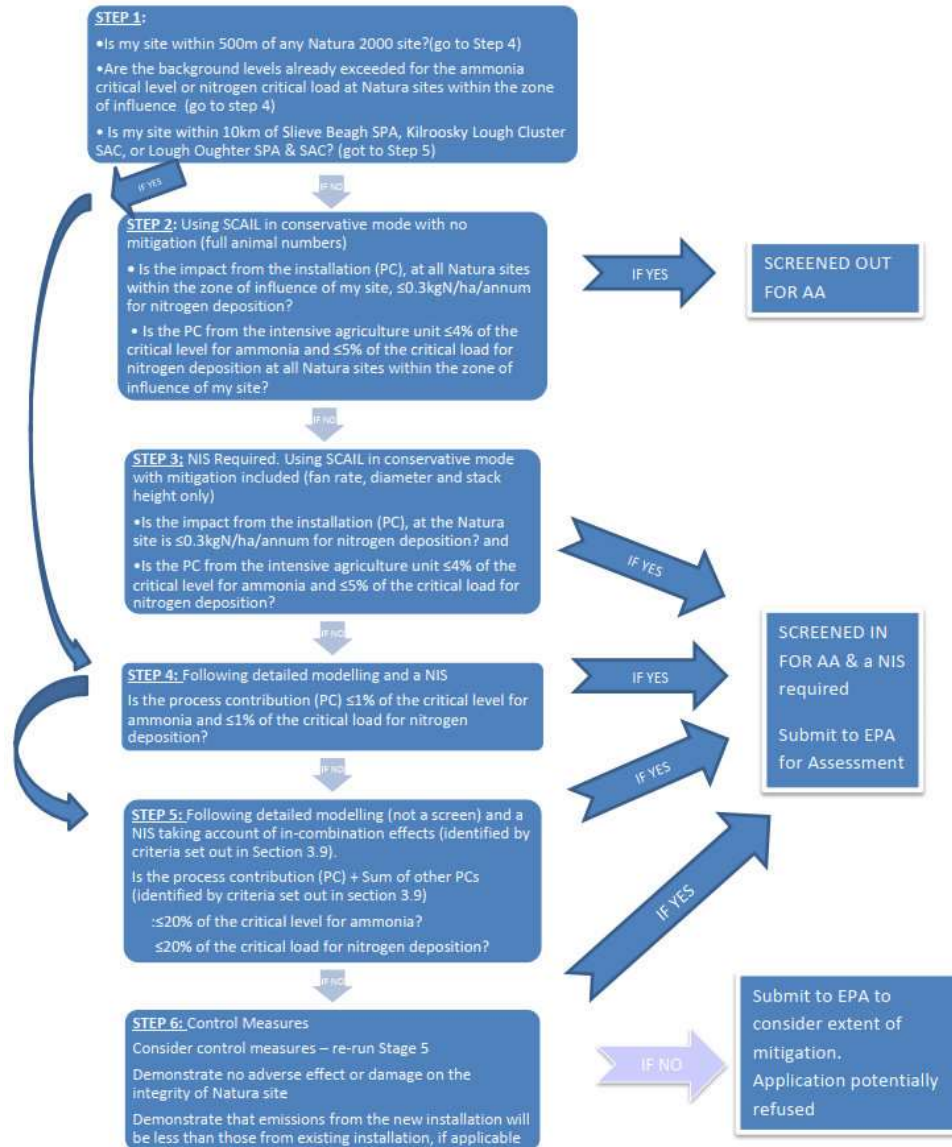


Figure 6 – EPA Flow Chart, Taken from Annex I of the Assessment of the Impact of Ammonia and Nitrogen on Natura 2000 sites from Intensive Agriculture Installations, EPA 2021

4.2 CUMULATIVE IMPACTS

There are other agricultural activities ongoing close to the current application site, therefore cumulative impacts arising from the operation of these farms together were considered. All farms, regardless of whether licensed by the EPA or not, are required to operate within the legalisation defined in S.I. 605 of 2017 regarding manure storage, minimisation of soiled water and general good agricultural practice, etc. Therefore, cumulative impacts arising from the combined operation of these activities with the proposed operation of the poultry farm at Kilnamaddy will be negligible.

The land-spreading of the poultry manure produced at the proposed facility has also been considered as part of this process. Records for the distribution and movement of all the manure produced will be kept on site and presented to the Department of Agriculture, Food and Marine if necessary. All organic fertiliser will replace the use of chemical fertiliser; therefore there will be no overall increase in the amount of nutrients spread.

All farmers that receive the manure from the proposed farm will do so under the European Union (Good Agricultural Practice for the Protection of Waters) Regulations 2022 (S.I. 113 of 2022). Upon the receipt of the manure, they will be informed of their obligation under this legalisation. Compliance with these regulations will minimise cumulative impacts as well as any impacts

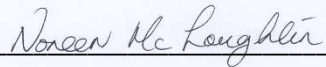
5 MITIGATION MEASURES

In order to further minimise emissions from the poultry facility at Kilnamaddy, a number of mitigation measures should be implemented and followed.

- Techniques for the reduction of emissions from the poultry houses must be employed on the farm. These are outlined in the document *Best Available Techniques Reference Document for the Intensive Rearing of Poultry or Poultry* (http://eippcb.jrc.ec.europa.eu/reference/BREF/IRPP/JRC107189_IRPP_Bref_2017_publiched.pdf).
- The applicant must follow the guidelines set out in the Department of Agriculture's *Explanatory Handbook for Good Agricultural Practice Regulations*.

6 NIS CONCLUSIONS

This Natura Impact Statement has concluded that with the mitigation measures outlined in this document and with the construction of the houses to a low emissions specification, the proposed operation of the poultry farm at Kilnamaddy will not lead to any significant impacts upon the designated sites identified. Although the stock numbers on the farm will increase with the re-aligning of the farm to pullet rearing only, the change in stock type will lead to an overall reduction in atmospheric emissions from the farm.



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(PI Insurance details available on request)