


***This Report has been cleared for submission to the Board by Programme Manager,
Marie O'Connor***

Signed: 

Date: 12/10/2023



**OFFICE OF ENVIRONMENTAL
SUSTAINABILITY**

**INSPECTOR'S REPORT ON AN INDUSTRIAL EMISSIONS LICENCE
REVIEW, LICENCE REGISTER NUMBER P0408-02**

TO: BOARD OF DIRECTORS

FROM: Brian Coffey, ELP Inspector

DATE: 12/10/2023

Applicant:	DDS Brady Farms Limited
CRO number:	536315
Location/address:	Carrickboy Farms, Ballyglassin, Edgeworthstown, County Longford.
Licence Review initiated:	18 December 2014
Classes of activity (under EPA Act 1992 as amended):	6.2: The rearing of pigs in an installation where the capacity exceeds: (a) 750 places for sows, or (b) 2,000 places for production pigs which are each over 30kg.
Categories of activity under IED (2010/75/EU):	6.6(b) Intensive rearing of pigs with more than 2,000 places for production pigs (over 30kg), or 6.6(c) Intensive rearing of pigs with more than 750 places for sows.
Main CID:	CID (EU) 2017/302 (15 February 2017). Establishing (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the intensive rearing of poultry or pigs.
All relevant CIDs, BREF documents and legislation are listed in appendices of this report.	
Activity description/background:	Existing activity for the rearing of pigs in an installation with capacity for 1,995 sows and 10,408 production pigs.
Additional information received:	No
No of submissions received:	15
Environmental Impact Assessment required: No	Stage 2 Appropriate Assessment required: Yes

1. Introduction

This is an Agency initiated licence review for an Industrial Emissions Directive (IED) licence to carry on an activity under Part IV of the Environmental Protection Agency Act 1992, as amended (hereafter referred to as the EPA Act). The review was initiated on 18 December 2014, to bring the existing licence, P0408-01, into compliance with the following legislation (Legislation references are as per the Section 87(1)(b) letter issued at the time):

- Protection of the Environment Act 2003;
- Directive 96/61/EC on Integrated Pollution Prevention and Control;
- Directive 2010/75/EU on Industrial Emissions (Integrated Pollution Prevention and Control);
- Regulation 1069/2009 on Animal By-Products;
- European Communities (Industrial Emissions) Regulations 2013 (SI 138 of 2013); and
- European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014 (SI 31 of 2014).

The licensee has not submitted any information in support of the review; therefore, the site-specific information used to complete this licence review was predominately from the original licence application, and the site's annual environmental reports.

DDS Brady Farms Limited operates a 2,000-sow integrated pig unit at Carrickboy Farms, Ballyglassin, Edgeworthstown, County Longford under an EPA-granted licence granted on 22nd October 1999. Details of the existing site capacity and infrastructure are provided in Table 1.1 below.

In February 2000, the licensee instigated judicial review proceedings of the licence, challenging the inclusion of certain conditions in the licence (P0408-01) (i.e. the classification of slurry as a waste and the imposition of licence requirements in areas outside the licence boundary) (1999/473JR).

This led to High Court and Supreme Court proceedings, cases 1999/473 JR and 143/2007 respectively, with the matter eventually adjudicated by European Courts. The ECJ hearing took place in February 2013, and the judgment issued in October 2013 (Case C-113/12).

Following the ECJ ruling, and as part of the Supreme Court settlement, the Agency agreed to review the licence to bring it in line with the ECJ ruling (i.e. as the producer of pig slurry does not intend to discard but rather to use it in an economically advantageous way, without causing pollution (i.e. landspreading), it does not come within the definition of 'waste'). In the time since the Supreme Court settlement, the Animal By-Product (ABP) Regulations¹ came into effect. The ABP Regulations state that

¹ EU Animal By-Product Regulation (EC) No. 1069 of 2009 and Regulation (EU) No. 142 of 2011, given legal effect by The European Union (Animal By-Product) Regulations 2014 (SI No. 187/2014), laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal By-Products Regulation) as amended.

pig manure is categorised as a category 2 Animal By-product and the options for its disposal/recovery are set out in Article 13 of Regulation 1069/2009, as amended.

No changes to the installation or scale of activity carried out on-site are proposed. Additional licence conditions to bring the activity into compliance with the Commission Implementing Decision (CID) have been included as part of the review.

Table 1.1. Stock numbers permitted under the existing licence.

<i>Pig categories</i>	<i>Number of animals</i>
Dry Sows	1,539
Farrowing sows	456
Maiden gilts	288
Boars	22
Weaners	7,084
Finishers	10,120
Total no. animals	19,509

For the purposes of the IED categorisation this equates to 1,995 sows and 10,408 production pigs (finishers and maiden gilts).

A map of the site layout is included in Appendix 1 of this report. Note that this map is the original site boundary as stated in condition 1.4 of the existing licence P0408-01. The licensee has not sought a change to the site boundary nor to activities on site in the time since P0408-01 was granted.

2. Description of activity

The installation is located in a rural location, with most development near the installation consisting of dwelling houses and farmyards.

The main activities at this installation occur during normal working hours. Stock inspections are carried out every day, including weekends and bank holidays and additional essential activities may be undertaken outside of core working hours.

The pig production process on this farm is typical of many other Irish units. The installation consists of a number of pig houses to cater for the different pig age categories on-site, along with slurry collection and storage tanks, and ancillary structures and equipment necessary for the accommodation, management and husbandry of the animals, and administration of the unit. The process involves the rearing of stock specifically bred from the on-site sows for meat production. Pigs will be reared at the installation until they reach the required finishing weight of approximately 110 kg. All houses will be fully cleaned out after each group of pigs is removed.

The type of pig house used for this activity is a simple closed building of concrete/steel/pre-fabricated panel on an impervious concrete base. The principal

inputs to the operation are feed, water, veterinary medicines and energy (electricity, diesel for back-up generator, and gas/oil for heating). The main by-product of pig rearing is organic fertiliser (slurry). This is discussed in further detail below.

3. Planning Status

No new developments have been proposed as part of this licence review. Planning permission is in place for the carrying out of the existing activity at the installation.

A number of planning applications have been made by the licensee for the area within the installation boundary since 1978. The planning applications made since the grant of P0408-01 are listed below in Table 3.1.

Table 3.1: Planning application history

Planning Reference	Description of Development	Date of Final Decision
98/547	Retention of Walled Concrete Manure Storage Area, ancillary works and effluent tank.	04/02/1999
99/78	5 Meal bins & shed to accommodate meal mixing, pumping equipment and other farm equipment.	22/04/1999
04/1205 (Appeal PL.212342)	Erect 2 no. weaners houses, extension of 3 nos. fattening houses and extend 1 no. dry sow house. Retention of farm office staircase enclosure, underground feed storage/mixing tank, screen wall around a carcass receptacle & pig fattening rooms on an area where feed storage was previously permitted.	03/09/2004
06/288	Removal of weaner house and erection of sow house on the same site to facilitate redistribution of existing herd within existing pig unit.	25/08/2006
08/261	Storage shed and ancillary site works.	31/07/2008
15/176	Construction of 1 no. pig house with slatted floor and slurry tank underneath, an extension with slatted floor and tank underneath to an existing pig house, to include all ancillary site works and augmentation of condition 2 attached to permission previously granted under PA04/1205 and PL14.212342.	Refused, 24/08/2016
16/241	Construction of extension to existing storage shed previously granted under PL 08/261 and all ancillary site works.	12/12/2016
17/267	Construction of 1 no. pig house with slatted floor and slurry tank underneath (960sq/m), an extension to existing pig house with slatted floor and tank underneath (305sq/m) and to include all ancillary site works.	Refused, 30/04/2018

18/278	Construction of 1 no. mixing shed and relocation and removal of meal silos and to include all ancillary site works. The application relates to development which is for the purposes of an activity requiring an industrial emissions licence.	26/02/2023
22/73	Demolition of existing pig house for replacement with new pig house structure to include replacement slatted floor and slurry tank below.	16/06/22

4. Environmental Impact Assessment (EIA) Screening

No developments or alterations to the site occurred as part of this review. Therefore, this licence review has not been made subject to an EIA.

5. Best Available Techniques and CID

This licence review process takes account of Commission Implementing Decision establishing BAT conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the intensive rearing of poultry or pigs (CID 2017/302).

Additional conditions have been incorporated into the RD to address BAT Conclusions and these are detailed throughout this report. Any relevant BAT-AELs have been specified in the emissions sections of this report. I consider that the BAT Conclusion requirements will be adequately addressed through the conditions and limits specified in the RD.

6. Emissions

6.1 Emissions to Air

This section addresses emissions to air from the installation and the environmental impact of those emissions.

6.1.1 Channelled Emissions to Air

There are no main emission points to air from the installation.

6.1.2 Fugitive Emissions

The only fugitive emissions from this sector are dust, odour and ammonia. These are discussed below. The nearest third-party dwellings potentially affected by fugitive emissions are detailed below (Table 6.1).

Table 6.1: Nearest third-party residential dwellings

Distance from Site	Direction from Site
250 m	east
260 m	northeast
510 m	northwest
520 m and 540 m	south

6.1.3 Dust

Dust may arise from the expulsion of warm air from ventilation systems on-site, vehicle movements, removal of organic fertiliser, filling of meal storage bins and the loading

and unloading of animals during periods of dry weather. Pigs are to be housed on fully slatted floors, therefore negating the need for a bedding material, and consequently limiting dust from bedding. Minimal dust impact may occur locally within the installation boundary during site operations.

No complaints or submissions were received in relation to dust for this site by the Agency or by the licensee.

Good housekeeping at the installation and keeping the concrete surface in a clean condition will minimise dust from the installation.

The RD specifies the following to prevent the generation and emission of dust:

- To use one or a combination of the techniques listed in BAT 11 to prevent or reduce dust emissions from the animal houses (Condition 6).

Dust is not expected to be a significant issue beyond the installation boundary.

6.1.4 Odour

Odour arising from the activity could have the potential to cause impairment to those living nearby. The nearest third-party residential dwellings are given in Table 6.1 above. One submission, for this licence review, from Ballyglasson Environmental Action Group on 3 December 2015, referenced odour issues from the site. Odour has not been identified as an issue by the Office of Environmental Enforcement (OEE).

The implementation of BAT on site will reduce odour emissions. Conditions in relation to BAT 3, 12, 13 and 30 are included in the RD. The licensee is required to provide an odour management plan which addresses the sources of odour from the installation, and mitigation measures to minimise odours.

Therefore, odour is not expected to be a significant issue.

The RD specifies the following odour control conditions:

- That odour from the activity shall not result in an impairment of, or an interference with amenities or the environment beyond the installation boundary (Condition 5).
- To use a diet formulation and nutritional strategy to reduce the total nitrogen and phosphorus excreted, as per BAT 3 and BAT 4 (Condition 6). The RD limits the crude protein content of the animal feed (Condition 6 and Schedule C).
- To use a combination of the techniques listed in BAT 13 to prevent/reduce odour emissions/impact from the site (Condition 6).
- To use a combination of the techniques listed in BAT 30 to reduce ammonia emissions to air from each pig house (Condition 6).
- That the licensee carries out an odour survey of the site operations in response to any odour complaint or as required by the Agency (Condition 6).
- That the licensee prepares, maintains and implements an odour management plan, and incorporates it into the Environment Management System (EMS) for the installation, as per BAT 12 (Condition 6).
- Should odour become an issue on-site, the RD includes a condition whereby the licensee can be required to reduce stock or install abatement to reduce odour emissions (Condition 6).

- That carcasses be stored on site in covered leak-proof containers and transported off site at least fortnightly in covered, leak proof containers (Condition 8).

6.1.5 Ammonia

The report "Ireland's Informative Inventory Report 2023"² (EPA, 2023) identifies agriculture as the primary contributor (99.4%) of Irish ammonia emissions in 2021, emitting a total of 124.65 kilotonnes (kt) of ammonia in that year. According to that report, ammonia emissions from the pig sector in 2021 accounted for 6.4 kt. The Department of Agriculture, Food and the Marine (DAFM) has published a 'Code of Good Agricultural Practice for reducing Ammonia Emissions from Agriculture'³, as required by the National Emission Ceiling Directive (NECD).

This installation, following implementation of BAT onsite, will emit approximately 69 tonnes of ammonia per annum. Ammonia emissions from this activity may have the potential to impact sensitive receptors in the vicinity of the installation. The Agency screened the impact of ammonia emissions and nitrogen deposition at European sites using a screening model (SCAIL Agriculture⁴) which indicated potentially elevated ammonia emissions and nitrogen deposition.

The model results indicate the potential for the pig rearing process to contribute to ammonia emissions and nitrogen deposition at Glen Lough SPA (site code 004045), Mount Jessop Bog SAC (site code 002202), Lough Iron SPA (site code 004046), Ardgullion Bog SAC (site code 002341), Garriskil Bog SAC (site code 000679), Garriskil Bog SPA (site code 004102), Lough Ree SAC (site code 000440), Lough Ree SPA (site code 004064), Brown Bog SAC (site code 002346), Ballymore Fen SAC (site code 002313), Lough Forbes Complex SAC (site code 001818), Lough Owel SAC (site code 000688), Lough Owel SPA (site code 004047), Ballykenny-Fisherstown Bog SPA (site code 004101), Lough Derravarragh SPA (site code 004043), Fortwilliam Turlough SAC (site code 000448), Scragh Bog SAC (site code 000692), Lough Kinale and Derragh Lough SPA (site code 004061), Clooneen Bog SAC (site code 002348), Derragh Bog SAC (site code 002201), Lough Ennell SAC (site code 000685), Lough Ennell SPA (site code 004044), Carn Park Bog SAC (site code 002336), Moneybeg and Clareisland Bogs SAC (site code 002340), Lough Sheelin SPA (site code 004065), Corbo Bog SAC (site code 002349), Lough Lene SAC (site code 002121), Crosswood Bog SAC (site code 002337), Wooddown Bog SAC (site code 002205) and Split Hills and Long Hill Esker SAC (site code 001831). The SCAIL Agriculture screening model is conservative.

As this was an Agency initiated licence review, the Agency commissioned a full site-specific model (not a screen model), as part of the completion of an Ecological Baseline

² <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/Ireland-IIR-2023-finalv2.1.pdf>

³ <https://www.gov.ie/en/publication/9a6c6-code-of-good-agricultural-practice-for-reducing-ammonia-emissions-from-agriculture/>

⁴ SCAIL Agriculture is a web-based screening tool available at <http://www.scail.ceh.ac.uk/>

Report, using more refined details in accordance with the requirements of AG4⁵. The model indicated no significant impacts in the SACs or SPAs.

This licence review will update the existing licence conditions to ensure they are consistent with CID 2017/302. Any upgrade of the site will lead to improved environmental standards and efficiencies and a reduction in ammonia emissions.

Qualifying interests in European sites will not be affected by ammonia emissions from the installation, due to the distance between the installation and the designated sites, the type and physical characteristics of the designated sites, and associated mitigation techniques conditioned in the RD.

The design of the buildings, adherence to good management practices, and implementation of the required mitigation measures will reduce ammonia emissions from the installation. The RD specifies the following additional ammonia minimisation conditions:

- To establish, maintain and implement an Ammonia Management Programme within six months of the date of grant of the licence and, in accordance with BAT 23, undertake an estimation/calculation of the reduction in ammonia emissions from the activity achieved by implementing BAT (Condition 5).
- To use a diet formulation and nutritional strategy to reduce the total nitrogen excreted, as per BAT 3 and BAT 4 (Condition 6).
- To use a combination of the applicable techniques listed in BAT 16 to reduce ammonia emissions to air from slurry stores (Condition 6).
- To use one or a combination of the applicable techniques listed in BAT 30 to reduce ammonia emissions to air from each house for pigs (Condition 6).

The potential for ammonia emissions from the landspreading of organic fertiliser is covered in the Organic Fertiliser section later in this report.

6.2 Emissions to Water and Ground

6.2.1 Emissions to Surface Waters

There are no direct process emissions to surface waters from this activity.

6.2.2 Emissions to ground/groundwater

There are no direct process emissions to ground/groundwater from this activity. There has been no historical contamination of groundwater at the site.

6.2.3 Other emissions to ground/groundwater

There are no other emissions to ground or groundwater.

⁵ Air Dispersion Modelling from Industrial Installations Guidance Note (AG4): <https://www.epa.ie/publications/compliance--enforcement/air/air-guidance-notes/epa-air-dispersion-modelling-guidance-note-ag4-2020.php>

6.3 Storm water discharges

Storm water arises on-site from rainwater collected from clean yards and from the roofs of buildings. All clean storm water is diverted away from soiled areas of the site by a storm water collection system around each house and is diverted by gravity for discharge via a four discharge points (DP1, DP2, DP3, and DP4) into field drains on the boundary of the site.

The table below gives details on installation's storm water discharges to waters, as well as details of the receiving water.

Table 6.2: Stormwater discharge point details

Discharge Reference	Monitored parameters (monitoring frequency)	Abatement	Drainage areas	Discharging to
DP1	Visual (weekly); COD/BOD (quarterly)	None	Roofs and clean yards	Field drain >> Lenamore stream >> River Inny
DP2	Visual (weekly); COD/BOD (quarterly)	None	Roofs and clean yards	Field drain >> Lenamore stream >> River Inny
DP3	Visual (weekly); COD/BOD (quarterly)	None	Roofs and clean yards	Field drain >> Lenamore stream >> River Inny
DP4	Visual (weekly); COD/BOD (quarterly)	None	Roofs and clean yards	Field drain >> Lenamore stream >> River Inny

The drains flow to the Lenamore Stream, which joins the River Inny approximately 7 km downstream of the installation. The Lenamore Stream currently has a WFD status of 'moderate' (waterbody code: IE_SH_26L060400). There are no identified downstream drinking water abstraction points on the Lenamore Stream.

The storm water discharged from the installation should be uncontaminated and, therefore, should have no qualitative impact on receiving waters.

The only period during which there is potential for contamination of surface waters is during removal of organic fertiliser (pig slurry) and during the loading or unloading of animals. Most movement of animals is via covered slatted passages and loading directly on to trailers, which separates clean and soiled waters, minimises the quantity of soiled water produced and keeps yard areas clean. The areas around the animal houses where the loading and unloading occurs are concreted and designed in such a way that any pig slurry is diverted to the slurry storage tanks under the houses. All soiled water from the washing of the houses is diverted to the organic fertiliser storage tanks under the animal houses.

The on-site infrastructure, adherence to good management practices, and implementation of any required mitigation measures will mitigate the risk of storm water contamination.

The RD requires the following in relation to storm water management:

- That all uncontaminated storm water be diverted to the storm water drainage system (Condition 6).
- That an up-to-date site drainage map be maintained on-site, and that the storm water drainage system be inspected weekly and maintained properly at all times (Condition 6).
- That a storm water/rainwater collection and drainage system for all pig houses on-site be provided and maintained (Condition 6).
- That inspection chambers at the outlets of the storm water drainage system be maintained (Condition 3).
- That a silt trap be provided and maintained on all existing storm water discharge points within twelve months of the date of grant of the licence, and that any new storm water discharge points shall be fitted with silt traps in advance of discharge (Condition 6).
- That the storm water discharge is visually inspected weekly and monitored for Chemical Oxygen Demand (COD) or Biological Oxygen Demand (BOD) as required by the Agency, in accordance with Schedule C.2.3 *Monitoring of Storm Water Discharges*.

The RD contains standard conditions in relation to the storage and management of materials and wastes. The RD also requires that accident and emergency response procedures are put in place. The controls pertaining to accidents and emergencies are addressed in the Prevention of Accidents section later in this report.

6.4 Noise

The main sources of noise at the installation include the operation of equipment, ventilation systems, the back-up generator, vehicle deliveries/collections, and animals. As mentioned earlier, the nearest third-party residential dwelling is c. 250 m away.

There has been no history of noise complaints at the installation, and none have been received by the Agency or the licensee. No submissions have been received outlining that noise is a cause for concern from the installation.

Noise emissions are primarily minimised by implementing good management practices. Noise conditions and emission limit values, which apply at noise-sensitive locations, have been included in the RD.

- Noise from the installation shall not exceed the limit values set out in Schedule *B.4 Noise Emissions* of the RD at the noise sensitive locations (Condition 4).
- The use of one or a combination of the techniques listed in BAT 10 to prevent/reduce noise emissions from the site (Condition 6).
- A requirement that a noise survey be carried out of the site operations, as required by the Agency (Condition 6).

In accordance with the EPA document *Guidance Note for Noise: Licence Applications, Surveys and Assessments in relation to Scheduled Activities (NG4)* (2016), the day time ELV has been changed from 55 dB LAeq to 55 dB LAr, to allow for corrections for tonal noise, and an evening time ELV has been introduced.

7. Waste Generation

Certain wastes are generated on-site as part of the licensable activity. Waste generated on-site mainly comprises of spent fluorescent tubes, fallen stock (animal carcasses), veterinary/chemical waste containers and general waste.

Conditions relating to waste management have been included in Condition 8 of the RD. This requires the licensee to ensure waste generated shall be prepared for re-use, recycling or recovery. Carcasses are stored temporarily on-site in covered skips, before being transported to an appropriately licensed installation.

Condition 3 of the RD requires the licensee to establish, maintain and implement a pest control programme in accordance with relevant DAFM guidelines. These guidelines take account of the requirements of the Campaign for Responsible Rodenticide Use (Ireland).

8. Organic Fertiliser

The installation will necessarily generate organic fertiliser (pig slurry, including soiled/wash water). Documentation submitted in support of the application for the existing licence indicated that the installation generates approximately 33,000 m³ of slurry per annum.

Soiled/wash water is generated by the activity during routine cleaning and at the end of each batch of pigs. The farm operates an all-in, all-out batch production system. Once the pigs are removed, the houses are washed down, with the resulting wash water is washed through the slatted floors into the tanks below, adding to the total volume of organic fertiliser produced. After washing, the houses are allowed to dry and then disinfectant applied. The wash water may contain insignificant quantities of disinfectant from the previous washing cycle.

Condition 8 of the RD requires that the licensee maintains a record of organic fertiliser sent off-site for use on land or for compost production in accordance with the requirements of the Nitrates Regulations⁶. The licensee is required under the licence to submit to DAFM by the 31st of December annually details in relation to the quantity of organic fertiliser (pig slurry) exported (Record 3 form) off-site. The record must also be maintained at the installation for inspection by the Agency, Local Authority or DAFM. DAFM may use the record of export of organic fertiliser to identify the recipient of the organic fertiliser and the quantity received.

The ABP Regulations impose legal requirements on the licensee, the 'commercial haulier' and the user of the organic fertiliser. These requirements include use of a 'commercial document' to record details required under the regulations. The licensee is required to receive a completed copy of the 'commercial document' from the transporter confirming the final destination.

There is no landspreading of organic fertiliser conducted and/or permitted within the installation boundary, and consequently there will be no additional ammonia emissions from landspreading activities within the installation boundary. It is important to note that the IE licence relates to the site of the activity for which the original licence application, P0408-01, is made and does not extend to the lands on which organic fertiliser may be used as fertiliser. The Nitrates Regulations specify when organic

⁶ S.I. No. 113 of 2022 European Union (Good Agricultural Practice for Protection of Waters) Regulations 2022.

fertiliser can be applied to land and the application rates, and these are enforced by the DAFM and Local Authorities.

As stated earlier, under the ABP Regulations, pig manure is categorised as a category 2 Animal By-product and the options for its disposal/recovery are set out in Article 13 of Regulation 1069/2009, as amended.

The pig slurry produced by the animals is contained in the slatted tanks under each animal house and in three aboveground circular slurry tanks. The areas around the houses will be concreted and designed such that any pig slurry produced here during animal loading and unloading is diverted to the slurry storage tanks under the houses. Animal manure is removed by the licensee from the slatted tanks under each pig house or slurry stores directly to tanker and immediately removed off-site.

The licensee has previously identified farmers who are available to accept organic fertiliser from the installation as fertiliser for their farms in County Longford and surrounding counties.

The Nitrates Regulations (Article 10(1)) require that a minimum of 26-weeks' storage capacity for organic fertiliser is provided. Documentation submitted in support of the application for the installation's existing licence indicated that there is a total slurry and wash water storage capacity on-site of approximately 36,552 m³, equal to 57 weeks storage capacity.

The quantity of nitrogen and phosphorus generated by the activity at the licence capacity (i.e. a 1,995-sow integrated unit) is approximately:

- 173,565 kg N per year, and
- 33,915 kg P per year,

based on figures available in the Nitrates Regulations (annual nutrient excretion rates for livestock)

The RD contains the following additional requirements relating to the management of organic fertiliser:

- To monitor the total nitrogen and phosphorus excreted in manure annually, in accordance with BAT 24 (Condition 6).
- That slurry only be stored within/under the animal houses or designated manure stores (Condition 8).
- That all storage tanks are integrity assessed at least once every three years (Condition 6).
- That a combination of the techniques listed in BAT 6 be used to reduce the generation of wash water on-site (Condition 6).
- That one or a combination of the techniques listed in BAT 7 be used to reduce the emissions to water from wash water on-site (Condition 6).

That a freeboard of at least 200 mm from the top of covered organic fertiliser storage tanks and 300 mm from the top of uncovered organic fertiliser storage tanks is maintained, as a minimum, at all times and that this is clearly indicated in the tank (Condition 6).

9. Energy Efficiency and Resource Use

The operation of the installation involves the consumption of fuel, electricity and resources. The estimated quantities used at a capacity of 1,995 sows and 10,408 production pigs are given below.

Table 9.1: Estimated resource usage

Resource	Quantity per annum
Electricity	82,176 kWh
Liquified Petroleum Gas	100 m ³ (Source: P0408-01 application)
Natural Gas	16,191m ³ (Source: 2022 Annual Environmental Report)
Water (GWS/on-site well)	Yes: 60,000m ³ (GWS/on-site well and stream) (Source: P0408-01 application)
Water Abstraction registration required:	Yes for groundwater abstraction.
Feed	11,000 tonnes
Diesel	Back-up generator only

The licensee employs a variety of technologies to maximise the efficient use of energy within the installation, including regular preventative maintenance of equipment, and thermal insulation.

The primary source of water for the activity is an on-site well. Additional water is provided by the Group Water Scheme. The RD requires the licensee to carry out monitoring of the well annually.

The installation is located on the Inny groundwater body (IE_SH_G_110), a poorly productive bedrock, which has a WFD status of 'Good'.

In accordance with the European Union (Water Policy) (Abstractions Registration) Regulations 2018 (S.I. No. 261 of 2018) those who abstract 25m³ of water or more per day are required to register their water abstraction with the EPA. The licensee has registered a river water abstraction from the Ballyglassin Stream (Reg. No. R00458-01). The licensee is required to register their groundwater abstraction where it exceeds 25m³ of water or more per day (Condition 3).

The RD specifies that the licensee undertake the following in relation to energy and resource efficiency:

- Annual maintenance of the animal house heating systems and the back-up generator (Condition 3).
- To install and maintain a water meter on all water supplies (Condition 3).
- To use a combination of the techniques listed in BAT 8 (efficient use of energy) and BAT 5 (efficient use of water) (Condition 7).
- To undertake an assessment of the efficient use of resources and energy in all site operations, undertake an energy audit, repeated at intervals as required by the Agency with the recommendations of the audit being incorporated into the Schedule of Environmental Objectives and Targets as outlined in Condition 2 (Condition 7).

10. Prevention of Accidents

A certain amount of accident risk is associated with the licensable activity. For this installation, potential accidents and measures for prevention/limitation of consequences are given in the table below.

Table 10.1: Potential accidents and measures for prevention/limitation of consequences

Potential for an accident or hazardous/emergency situation to arise from	- Surface water or ground/groundwater contamination during pig removal.
--------------------------------------------------------------------------	-------------------------------------------------------------------------

activities at the installation	<ul style="list-style-type: none"> - Surface water or ground/groundwater contamination by spillage of organic fertiliser, fuel or other polluting materials. - Surface water and/or ground/groundwater contamination due to leaks from tanks. - Accidental emissions of noise, dust or odour such as to cause nuisance outside the site boundary.
Preventative/Mitigation measures to reduce the likelihood of accidents and mitigate the effects of the consequences of an accident at the installation	<ul style="list-style-type: none"> - The provision and maintenance of adequate wash water and slurry storage facilities. - The storage of potentially polluting liquids in bunded areas. - The protection of fuel tanks from accidental damage. - The separation of wash water and clean storm water with wash water diverted directly to the slurry storage tanks under the animal houses.
Additional measures provided for in the RD	<ul style="list-style-type: none"> - Integrity assessment and maintenance of the slurry storage tanks as required (Condition 6). - The regular visual examination and inspection of the storm water discharge points and storm water drainage system (Condition 6). - The provision of more than 26-weeks organic fertiliser storage capacity (Condition 3). - Accident prevention and emergency response procedures requirements (Condition 9). - A preventative maintenance programme (Condition 2).

The risk of accidents and their consequences, and the preventative and mitigation measures listed above, have been considered in full in the assessments carried out throughout this report. It is considered that the conditions of the RD and the mitigation measures proposed will significantly reduce the likelihood of accidental emissions occurring and limit the environmental consequences of such an event should it occur.

11. Cessation of Activity

A certain amount of environmental risk is associated with the cessation of any licensable activity (site closure). Condition 10 of the RD requires the proper closure of the activity with the aim of protecting the environment.

Where an activity involves the use, production or release of relevant hazardous substances, and having regard to the possibility of soil and groundwater contamination at the site of the installation, the IED requires operators to prepare a baseline report. Consistent with other pig-rearing IE licences, the Agency is satisfied there are no relevant hazardous substances used, produced or released in relation to the licenced activity.

Nonetheless, upon cessation of the activity, Condition 10 of the RD requires the applicant/licensee to take certain measures to ensure that there is, to the satisfaction of the Agency, no remaining risk of environmental pollution at the site.

12. Fit and Proper Person

Technical Ability

The licensee has held a licence issued by the EPA since 22 October 1999, P0408-01. It is considered that the licensee has demonstrated the technical knowledge required to operate this installation.

Legal Standing

Neither the licensee nor any relevant person has relevant convictions under the EPA Act, as amended, or under any other relevant environmental legislation.

ELRA, CRAMP and Financial Provision

The licence category and proposed installation were assessed for the requirements of Environmental Liabilities Risk Assessment (ELRA), Closure, Restoration and Aftercare Management Plan (CRAMP) and Financial Provision (FP), in accordance with Agency guidance. Under this assessment it has been determined that ELRA, CRAMP and FP were not required.

Fit and Proper Conclusion

It is my view that the licensee can be deemed a Fit and Proper Person for the purpose of this review.

13. Submissions

While the main points raised in the submissions are briefly summarised in the table below, the original submission should be referred to at all times for greater detail and expansion of particular points.

The issues raised in the submissions are noted and addressed in this Inspector's Report and the submissions were taken into consideration during the preparation of the Recommended Determination (RD).

Table 13.1: Summary of submissions received.

1.	Name & Position:	Organisation:	Date received:
	Mr. Peter Sweetman	Peter Sweetman and on behalf of Wild Ireland Defence CLG	15 June 2023
Issues raised:			
<i>The submission:</i>			
<ul style="list-style-type: none"> • States that the EPA must assess the disposal of the waste from these developments; • States that the threshold for Appropriate Assessment is set out in Kelly -v- An Bord Pleanála [2014] IEHC 400 (25 July 2014); 			
<i>References four CJEU judgements in the context of Article 6 of the Habitats Directive, specifically C-323/17, C-258/11, C-293/17 and C-294/17.</i>			
Agency response:			

The submitter's reference to "these developments" refers to pig and poultry industrial emissions licence applications.

I am satisfied that I have sufficient information available to complete an Appropriate Assessment Screening, in an appropriate manner, to assess in view of best scientific knowledge and the conservation objectives of the site, if the project individually or in combination with other plans or projects is likely to have a significant effect on a Natura 2000 Site.

The Appropriate Assessment section of this report details the results of the appropriate assessment conducted as part of the licence review. More information on waste can be found in the waste section of this report.

The submitter quotes Case C-323/17 where the court noted that "*in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site*".

I am satisfied that the screening conducted as part of this licence review to determine whether or not an Appropriate Assessment was required was consistent with case C-323/17 and did not take into account measures that would mitigate any potential impacts on Natura 2000 sites.

The submitter quotes Kelly -v- An Bord Pleanála [2014] IEHC 400 which references CJEU case C-258/11 where the court noted that in order for a regulatory body such as the Agency to grant approval "*it should be pointed out that it cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned*".

I am satisfied that there is sufficient information available to the Agency to conclude beyond reasonable scientific doubt that emissions and discharges from the proposed project will not have any adverse effects on the integrity of any European site. The Appropriate Assessment section of this report details the results of the appropriate assessment conducted as part of the licence review. More information on waste can be found in the waste section of this report.

The submitter quotes cases C-293/17 and C-294/17 where the court ruled "*Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that the grazing of cattle and the application of fertilisers on the surface of land or below its surface in the vicinity of Natura 2000 sites may be classified as a 'project' within the meaning of that provision, even if those activities, in so far as they are not a physical intervention in the natural surroundings, do not constitute a 'project' within the meaning of Article 1(2)(a) of Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment.*"

Organic fertiliser is something which may be distributed to farmers for use on their farms, but that ultimately use does not form part of the project in respect of which the Agency was considering a licence review. Ultimately, the location on which landspreading of organic fertiliser from the installation may occur, can vary across and within any given year.

The spreading of organic fertiliser on farms is regulated by the European Union (Good Agricultural Practice for the Protection of Waters) Regulations 2022 (S.I. 113 of 2022) which gives effect to the 5th Nitrates Action Programme (2022 to 2025), published in accordance with the Nitrates Directive.

I am satisfied that the appropriate assessment conducted as part of this licence review is considered in compliance with the rulings of the Courts of Justice of the European Union judgement for cases C-293/17 and C-294/17.

2.	Name & Position: Mr Peter Sweetman	Organisation: Peter Sweetman	Date received: 25 March 2023
<p>Issues raised:</p> <p><i>In the submission Mr. Sweetman quotes the following from the Courts of Justice of the European Union judgement for cases C-29317 and C-29417:</i></p> <p><i>1. Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that the grazing of cattle and the application of fertilizers on the surface of land or below its surface in the vicinity of Natura 2000 sites may be classified as a 'project' within the meaning of that provision, even if those activities, in so far as they are not a physical intervention in the natural surroundings, do not constitute a 'project' within the meaning of Article 1(2)(a) of Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment.</i></p> <p>Agency response:</p> <p>Organic fertiliser is something which may be distributed to farmers for use on their farms, but that ultimately use does not form part of the project in respect of which the Agency was considering a licence review. Ultimately, the location on which landspreading of organic fertiliser from the installation may occur, can vary across and within any given year.</p> <p>The spreading of organic fertiliser on farms is regulated by the European Union (Good Agricultural Practice for the Protection of Waters) Regulations 2022 (S.I. 113 of 2022) which gives effect to the 5th Nitrates Action Programme (2022 to 2025), published in accordance with the Nitrates Directive.</p> <p>In 2022, the 5th Nitrates Action Programme was subject to appropriate assessment (as referred to in this Agency's Inspector's Report) and a strategic environmental assessment. In addition, the referenced Courts of Justice ruling stated that "Article 6(3) of Directive 92/43 must be interpreted as not precluding national programmatic legislation which allows the competent authorities to authorise projects on the basis of an 'appropriate assessment' within the meaning of that provision, carried out in advance and in which a specific overall amount of nitrogen deposition has been deemed compatible with that legislation's objectives of protection."</p> <p>The appropriate assessment screening conducted as part of this licence review is considered in compliance with the rulings of the Courts of Justice of the European Union judgement for cases C-29317 and C-29417.</p>			
3.	Name & Position: Laura Broxson	Organisation: National Animal Rights Association	Date received: 17 December 2022
<p>Issues raised:</p> <p><i>The issues raised in the submission are as follows:</i></p> <ul style="list-style-type: none"> • <i>The submitter states that the application should be refused as it is "not ethically acceptable to kill or consume any living creature".</i> • <i>The submission states that "Ireland's ammonia emissions have not met EU limits for 7 out of the last 9 years" and that "almost all of Ireland's ammonia emissions come from agriculture". It states that "more than half are located in Monaghan and Cavan, counties already struggling with excess manure".</i> 			

	<ul style="list-style-type: none"> • <i>The submission goes on to include some of the damage that can be caused by ammonia pollution and PM2.5 to the environment and human beings.</i> • <i>It concludes that "for animal rights, human health and safety, and the impact it would have on the environment, these 36 applications need to be refused".</i> <p><i>The submission goes on to list by Reg. No., all of the pig and poultry licence applications upon which the submission is to be made.</i></p> <hr/> <p>Agency response:</p> <ul style="list-style-type: none"> • The principle of whether or not it is ethical to consume meat is beyond the remit of the EPA. • Ireland is addressing ammonia emissions from the agricultural sector through the implementation of 'Ag Climatise – A roadmap towards Climate Neutrality'. The recommendations of this document, regarding the national reduction of ammonia levels, are considered during the assessment of licence applications and licence reviews. • All intensive agriculture EPA licensed facilities are required to operate to the best available techniques (BAT) standard as specified in the Commission Implementing Decision (CID) for the intensive rearing of poultry or pigs. This includes the requirement to implement techniques for the reduction and control of ammonia emissions. • Due to the number of intensive agriculture applications/reviews and licences, especially in the Cavan/Monaghan, the EPA published guidance on how applicants should assess the predicted impact of air emissions. This has specific restrictions on applications in the Cavan/Monaghan area. <p>The assessment of this licence review included undertaking of an Environmental Impact Assessment (EIA) Screening of the activity. Further information on this can be seen in the 'EIA' section of this report.</p>		
4.	<p>Name & Position: Aislinn Byrne</p>	<p>Organisation: Member of the public</p>	<p>Date received: 14 December 2022</p>
	<p>Issues raised:</p> <p><i>The issues raised in the submission are as follows:</i></p> <p><i>"I am objecting to the following applications on the grounds that factory farming, or intensive agriculture, is seriously damaging the environment. The systems currently in place in the respective counties of the applicants are insufficient to deal with the current level of animal agriculture. Approving licenses for additional intensive farming would be wilfully destroying the land and the environment and putting peoples [sic] health at risk.</i></p> <p><i>Separately it is cruel to farm animals in this manner. It's raises questions around the health of the animals and therefore the end product that is being sold to humans. It is putting smaller farmers out of business".</i></p> <p><i>The submission goes on to list by Reg. No., all of the pig and poultry licence applications upon which the submission is to be made.</i></p>		

	<p>Agency response:</p> <p>The Agency will not grant a licence or revised licence unless it is satisfied that emissions comply with relevant emission limit values and standards prescribed under regulations. As this licence review will update the existing licence conditions to ensure they are consistent with CID 2017/302, the result of this process will lead to a net decrease in emissions from the licenced activity relative to operating under the existing licence conditions which came into effect in 1999.</p> <p>The submission also mentions animal cruelty concerns and Ireland has legislation governing animal welfare, which are the responsibility of the Dept. of Agriculture, Food and the Marine (DAFM).</p> <p>The submission also mentions financial implications of intensive farming over “smaller farmers”. The viability of a business, including farming, is beyond the scope of the EPA Licensing Process.</p>		
5.	<p>Name & Position:</p> <p><i>M. Peter Sweetman</i></p>	<p>Organisation:</p> <p><i>Peter Sweetman and Wild Ireland Defence CLG</i></p>	<p>Date received:</p> <p><i>27 October 2022</i></p>
	<p>Issues raised:</p> <p><i>The submission states that the CJEU has found that compliance with European Union (Good Agricultural Practice for the Protection of Waters) Regulations 2017 (S.I. 605 of 2017) cannot be considered a mitigation measure when conducting an appropriate assessment.</i></p> <p>Agency Response:</p> <p>The submission did not provide a reference to the Court of Justice of the European Union (CJEU) case to which it refers. However, the judgments of the CJEU form part of this review assessment, as appropriate. The landspreading of organic fertilizer was considered in carrying out AA and regard was had to the regulatory systems in place, i.e. <i>European Union (Good Agricultural Practice for Protection of Waters) Regulations 2022.</i></p>		
6.	<p>Name & Position:</p> <p><i>Joe and Tess Murray</i></p>	<p>Organisation:</p> <p><i>Ballyglasson Environmental Action Group (BEAG)</i></p>	<p>Date received:</p> <p><i>05 August 2022</i></p>
	<p>Issues raised:</p> <p><i>The submission references a grant of planning permission relating to the installation. The submitter believes that the licensee has an “appalling record of non-compliance with EPA conditions in the past” and urges the EPA to ensure that any terms proposed in the current licence review be adhered to or that the licence review application be refused.</i></p> <p><i>The submissions states that due to the prospect of catastrophic climate change and the need for reductions in agricultural greenhouse gas emissions, that it is ill-advised to licence any type of intensive farming projects.</i></p> <p>Agency Response:</p>		

	<ul style="list-style-type: none"> The purpose of this licence review is to update the existing licence conditions to ensure they are consistent with current legislation including CID 2017/302, Protection of the Environment Act 2003, Directive 96/61/EC on Integrated Pollution Prevention and Control, Directive 2010/75/EU on Industrial Emissions (Integrated Pollution Prevention and Control), Regulation 1069/2009 on Animal By-Products, European Communities (Industrial Emissions) Regulations 2013 (SI 138 of 2013) and European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014 (SI 31 of 2014). No planning permissions are associated with this review. The licensee's compliance record is considered as part of the Agency's assessment. There are three non-compliances (the last being in 2018) and no compliance investigations associated with this licence over the past ten years. The licensee is obliged to comply with the conditions of its existing and will similarly be obliged to comply with the conditions of any future licence. This is an existing installation. No change in the scale of the activity is proposed by this review, however the addition of new conditions regarding energy efficiency will lead to a reduction in the greenhouse gas emissions associated with the activity. 		
7.	Name & Position: Mr. Peter Sweetman	Organisation: Peter Sweetman and on behalf of Wild Ireland Defence CLG	Date received: 13 October 2020
<p>Issues raised:</p> <p><i>The issues raised in the submission are as follows:</i></p> <p><i>In the submission Mr. Sweetman indicated that "it is not possible to perform an Appropriate Assessment Screening to the standard required by Finlay J in Kelly -v- An Bord Pleanála [2014] IEHC 400 (25 July 2014). Without the full information as to the method and place of disposal of the waste.</i></p> <p><i>It is our submission that the EPA Acts as interpreted by the EPA are not in compliance with the Environmental Impact Assessment Directive Article 11."</i></p> <p>Agency response:</p> <p>I am satisfied that I have sufficient information available to complete an Appropriate Assessment Screening, in an appropriate manner, to assess in view of best scientific knowledge and the conservation objectives of the site, if the project individually or in combination with other plans or projects is likely to have a significant effect on a European Site. An Appropriate Assessment Screening Determination was issued on 14 March 2022, which included specific reasons for determining that a Stage 2 Appropriate Assessment was required, and subsequently an Ecological Baseline Report was produced.</p> <p>The Appropriate Assessment section of this report details the results of the appropriate assessment screening conducted as part of the licence review. More information on waste can be found in the waste section of this report.</p> <p>There is sufficient information to conclude beyond reasonable scientific doubt that the disposal of waste arising from the proposed project will not have any adverse effects on the integrity of any European site.</p> <p>I am satisfied that the EPA's interpretation of the EPA Act is in accordance with Article 11 of the EIA Directive, and members of the public have access to a review procedure that is impartial, fair, equitable, timely and not prohibitively expensive. Information on the EPA's licensing process, including access to administrative and judicial review procedures, is available to the public on the EPA's website, at</p>			

	https://www.epa.ie/our-services/licensing/industrial/industrial-emissions-licensing-ied/industrial-emissions-licensing-process-explained-/ As part of this licence assessment process, including EIA and AA screening, regard has been given to all submissions received.		
8.	Name & Position <i>Mr Peter Sweetman</i>	Organisation: <i>Mr Sweetman & Associates</i>	Date received: <i>28 January 2019</i>
	Issues raised: <p><i>The submission refers to CJEU case references C-258/11, C-164/17, C-323/17, C-461/17 and joined cases C-293/17 and C-294/17, and states the following:</i></p> <p><i>"Any licence granted by the EPA for the following applications must comply with the Habitats and Birds Directives and must comply with the following judgements of the CJEU."</i></p>		
	Agency response: <p>The requirements of the EIA Directive (2011/92/EU as amended by 2014/52/EU) and the Habitats Directive (92/43/EC) and Birds Directive (2009/147/EC) are considered as part of the Environmental Impact Assessment and Appropriate Assessment sections of this report. In addition, the judgments of the Court of Justice of the European Union form part of this assessment, as appropriate.</p> <p>Judgment reference numbers C-293/17 and C-294/17 relate to habitat protection and the impacts from nitrogen deposition. The legislation governing ammonia emissions from livestock installations across Member States varies and is not directly comparable. The Judgment references C-293/17 and C-294/17 relate to the system in The Netherlands, where a new approach was adopted in 2015 in the form of a 'programmatische' (or integrated) approach to nitrogen/ammonia (Programmatische Aanpak Stikstof - PAS). This approach deals with the assessment requirements of the Habitats Directive Article 6(3) at a 'programmatische' level considering general reduction trends as well as (planned) management and restoration measures with the purpose to establish a "room for development" for subsequent permits. The PAS has been successfully challenged in the courts (C-293/17 & C-294/17) on the grounds that it is not in accordance with the Habitats Directive. This approach is not used in Ireland.</p> <p>See also the section on appropriate assessment later in this report.</p>		
9.	Name & Position: <i>Joseph Murray</i>	Organisation: <i>Ballyglasson Environmental Action Group (BEAG)</i>	Date received: <i>17 August 2018</i>
	Issues raised: <p>The submission references a planning application made by the licensee rejected by the planning authority on the following grounds:</p> <ul style="list-style-type: none"> • that "the proposed development, with the lack of specific detail in its EIAR would not give rise to the risk of pollution and pose a significant threat to the quality of ground and surface water". • "The EIAR lacked specific detail in its assessment of environmental impact, waste, emissions and identification and impact on surrounding water courses ... both individual and cumulative". 		

	<ul style="list-style-type: none"> Thirdly, the Planning Authority was not satisfied that there was sufficient information to carry out a full EIA. <p>The submitter believes this has repercussions for the licence review and that the concerns expressed by Longford County Council need to be considered during the licence review.</p> <p>Agency Response:</p> <p>The planning application referenced (17/267) was rejected. The development proposed has not occurred. There are no developments or EIA associated with this licence review.</p>		
10.	<p>Name & Position</p> <p><i>Mr Peter Sweetman</i></p>	<p>Organisation:</p> <p><i>Mr Sweetman & Associates</i></p>	<p>Date received:</p> <p><i>17 July 2018</i></p>
	<p>Issues raised:</p> <p><i>The submission provides a copy of judgment of the 12 April 2018 by the CJEU, in relation to Case C-323/17 and quotes the ruling from that judgment that:</i></p> <p><i>"Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site."</i></p> <p>Agency Response:</p> <p>In the Appropriate Assessment section of this report, I have addressed the potential for significant effects of the project on European sites and have detailed the results of an Appropriate Assessment conducted as part of the licence review.</p> <p>There are 30 European sites within 30 km of the installation. Any European sites more than 30 km distance from the installation fall well outside of the potential zone of influence of the activity, so it was not necessary to consider them further.</p> <p>This assessment determined that the activity is not directly connected with or necessary to the management of any European site and through setting out of a set of reasons, determined that an Appropriate Assessment of the activity is required, and for this reason required an Ecological Baseline Report to complete this licence review.</p> <p>Qualifying interests and conservation objectives of each individual site were examined as part of that assessment.</p> <p>The Appropriate Assessment section details the results of the appropriate assessment screening and the appropriate assessment conducted as part of the licence review.</p>		
11.	<p>Name & Position</p> <p><i>Mr. Enda Coffey, Mr. Paul McGuinness</i></p>	<p>Organisation:</p> <p><i>Environmental Health Department, HSE Dublin Mid-Leinster</i></p>	<p>Date received:</p> <p><i>22 July 2016</i></p>
	<p>Issues raised:</p> <p>The HSE notes that a planning application associated with the installation was submitted to Longford County Council, that an EIAR was submitted with that planning application, and that no EIAR has been submitted in support of this licence review.</p>		

	<p>The HSE further notes that third party submissions have been made in respect of this application.</p> <p>Agency Response:</p> <p>The points raised by the HSE are noted. No developments or alterations to the site occurred as part of this review. Therefore, this licence review has not been made subject to an EIA. Third party submissions are addressed in the submissions section of this report.</p>		
12.	<p>Name & Position</p> <p><i>Mr Peter Sweetman</i></p>	<p>Organisation:</p> <p><i>Mr Sweetman & Associates</i></p>	<p>Date received:</p> <p><i>13 March 2016</i></p>
	<p>Issues raised:</p> <p>Mr. Sweetman contends that "To adequately screen for effects on a Natura Site it is mandatory that a map of the spread lands be included in the application." He refers to and attaches a letter from the Development Applications Unit (DAU) of the Department of Arts, Heritage and the Gaeltacht (DAHG) to the Planning Director of Services of Limerick City and County Council (dated 12 October 2015) in relation to a planning application for a pig farm in Abbeyfeale County Limerick (planning ref 15/573). In the letter, the DAU states that for Appropriate Assessment Screening under the Birds and Natural Habitats Regulations 2011, a map of the spread lands is required to ensure that there is no significant negative effect on any Natura 2000 site from the proposal. The DAU also states that the spread lands should be subject to AA screening with particular reference to potential effects on water quality.</p> <p>Agency response:</p> <p>Appropriate Assessment screening for the activity has been carried out as detailed in Section 15 below. The issue of Appropriate Assessment and the spreading of organic fertiliser is discussed therein.</p> <p>Organic fertiliser generated by the activity will be sent off-site for use as fertiliser in accordance with the (Good Agricultural Practice for the Protection of Waters) Regulations 2022 (S.I. 113 of 2022), (Nitrates Regulations) and the European Animal By-product Regulations (EC Regulation No 1069/2009 and Commission Regulation 142/2011), (Animal By-product Regulations). The IE licence relates to the installation of the activity for which the licence application is made and does not extend to the lands on which organic fertiliser may be used as fertiliser.</p> <p>The use of organic fertiliser as fertiliser will be carried out in accordance with the Nitrates Regulations and Animal By-product Regulations and will be monitored and controlled by the DAFM and Local Authorities. The use of organic fertiliser as fertiliser will be carried out in accordance with the Nitrates Regulations and Animal By-product Regulations and will be monitored and controlled by the DAFM and Local Authorities. We have regard to their regulatory role as part of our AA assessment.</p> <p>It is noted that the Department of Arts, Heritage and the Gaeltacht (DAHG) are a specified body which is notified of all licence applications and licence review applications received by the Agency. The DAHG was notified of this licence review and no submission has been received.</p>		
13.	<p>Name & Position:</p> <p><i>Joe and Teresa Murray</i></p>	<p>Organisation:</p> <p><i>Ballyglasson Environmental Action Group (BEAG)</i></p>	<p>Date received:</p> <p><i>03 December 2015</i></p>
	<p>Issues raised:</p>		

	<p>The submission makes statements in relation to the following:</p> <ul style="list-style-type: none"> • Unauthorised construction on-site, with a pattern of obtaining planning retention rather than planning permission, which has been tolerated by the planning authority and EPA. • No EIA has been carried out for the installation. • Nuisance from the installation, including air (odour) and water pollution. No attempt to mitigate the nuisance through installation of an aerobic digester. • Repeated non-compliance with the existing licence. • The role of agriculture in climate change is raised as a further reason why no expansion of the activity should be permitted. <p>Agency response:</p> <ul style="list-style-type: none"> • The planning authority is the competent authority with respect to the planning status of the installation. The EPA is not aware of any current issues with the planning status of the installation. • With respect to the licence review, no change or expansion in the activity is proposed, therefore no EIA is necessary. • The updated licence will improve the environmental performance of the installation by introducing additional licence conditions to bring the activity into compliance with the Commission Implementing Decision (CID). • In recent years, the compliance history of the licensee is substantially improved, with no complaints since 2016. • No expansion of the activity is proposed or authorised. 		
14.	<p>Name & Position: Mr. David Malone</p>	<p>Organisation: Environmental Action Alliance – Ireland (EAA-I)</p>	<p>Date received: 17 and 30 November 2015</p>
	<p>Issues raised:</p> <p>On 17 November 2015 Mr. Malone made a submission stating that the licensee had made a planning application to extend the installation and that no EIS had been submitted with the application. He requested that the EPA identify the current status of the application and confirm whether he could still make a submission on the application.</p> <p>On 30 November Mr. Malone made a further submission covering the following:</p> <ul style="list-style-type: none"> • Case C-215/06 of the CJEU, relating to the need for EIA to be considered prior to the execution of a development wholly or in part, and therefore retention planning could not be granted for developments which would have required EIA. Mr. Brady has been repeatedly granted retention permissions. • Case C-113/12 of the CJEU, brought by Mr. Brady against the EPA in relation to the regulation of landspreading of slurry outside the licensed site boundary. Repeated mention is made of unauthorised waste activities, which in this instance refers to the management and export offsite of pig slurry. Mr. Malone states that paragraph 59 of the C-113/12 judgement ruled that pig slurry is a waste and that the licence for the installation should therefore include the activity category 6.5, as listed in Annex 1 of the IED, "<i>The disposal or recycling of animal carcasses or animal waste with a treatment capacity exceeding 10 tonnes per day</i>". • The poor compliance history of the licensee. A letter dated 14 March 2005 submitted by the EPA to the European Commission is referenced. 		

- Mr. Malone alleges that as the pig installation was granted retention planning permission without having conducted an EIA, under Case C-215/06, the retention consent should be revoked. The installation is therefore unauthorised, the existing licence issued by the Agency is legally flawed, and the current review cannot be processed.
- Case C-50-09 of the CJEU, which requires "*complete fulfilment of the requirements of Articles 2 to 4 of the EIA Directive, as amended by the Public Participation Directive*". Mr. Malone states that this means that the EPA will not consider such a licence application unless the development consent process, including EIA, has been concluded or at least the application for the consent lodged with the planning authority. Mr. Malone maintains that the licensee does not at present have an existing IE licence. He states that the EPA cannot consider these licence applications without an EIA being conducted and having received a copy of the EIS. Reference is made to a planning application made by the licensee (ref. no. 15/176) and that no EIS was submitted in support of that application.
- Mr. Malone references a letter issued by the Agency to Longford County Council on 06 November 2015, which indicated that the licence review may accommodate changes to the activity (pig numbers) based on the outcome of a planning application (ref. no. 15/176) made by the licensee and that this is incorrect as the review was solely to implement the outcome of case C-50/09.
- That the Agency, at Mr. Brady's request, decided to disapply the CJEU judgements in cases C-215/06 and C-50/09, instead focusing solely on the judgement in Case C-113/12.
- That as a transfer of the licence from Mr. Brady has occurred, a new licence is required by the current licence holder DDS Brady Farms Ltd.
- That the licensee is required to submit a baseline report in support of the licence review and that the Agency has decided not to request this information.
- That "*consultation on the planning application, licence application and EIS must be carried out in accordance with the EU (Environmental Impact Assessment) (Integrated Pollution Prevention and Control) Regulations 2012*" and that "*the Agency is ignoring the rights of citizens under the Treaty of European Union violation citizens rights under Aarhus Convention and the European Charter of Human Rights*". Mr. Malone states that unless the Agency notifies the EEA-I that it intends to resolve the issues raised in this submission, the EEA-I will lodge a complaint with the European Commission.

Agency response:

The submitter refers to case CJEU C-215/06 which is concerned with the legality of local authority planning permissions issued for this installation where EIA was required. The licence review does not expand the scope of installation and activity beyond those activities that had already received planning permission from Longford County Council at the time of the initial licence assessment. No developments or alterations to the site occurred as part of this review. Therefore, this licence review has not been made subject to an EIA.

The submitter references CJEU case C-113/12. In C-113/12, the CJEU ruled that slurry can only be deemed not a waste where it can be shown to be a by-product. However, subsequent to the ruling, EU legislature evolved, and the Agency is no longer required to commence its analysis from the position that manure generated from piggery operations "is, in principle, waste". Legislation now includes 'manure' within the scope of the ABP Regulations.

Regarding the compliance history of the licensee, there are no compliance investigations open in relation to the site and no complaints have been received since 2013. The last non-compliance was issued in 2018. There are no significant compliance issues at the site.

The submitter referred to CJEU cases C-215/06 and states that the retention consent should have been revoked by the local authority. The cancellation of this existing retention planning permission is outside the scope of EPA powers and is currently not revoked. As such, I am satisfied that all legally required planning permissions are in place for the activities assessed in this licence review.

The submitter referred to CJEU case C-50/09 and states that the EPA cannot consider these licence applications without an EIA being conducted and having received a copy of the EIS. However, no developments or alterations to the site occurred as part of this review. Therefore, this licence review has not been made subject to an EIA.

The submitter referred to a letter from the Agency to Longford County Council on 06 November 2015. I am satisfied that this licence review assessment does not increase the scale or impact of activities at the installation. The animal numbers assessed were the same as the number currently permitted in Schedule 1(i) of the existing licence, P0408-01.

The submitter suggests that the Agency, at Mr. Brady's request, decided to disapply the CJEU judgments in cases C-215/06 and C-50/09, instead focusing solely on the judgement in Case C-113/12. However, as detailed above, I am satisfied that C-215/06, C-50/09 and C-113/12 were considered appropriately in this licence review assessment.

The submitter stated that as a transfer of the licence from Mr. Brady has occurred, a new licence is required by the existing licence holder DDS Brady Farms Ltd. However, I am satisfied that the licence transfer from Mr. Brady to DDS Brady Farms Ltd was undertaken in full compliance with the requirements of Section 94 of the EPA Act which facilitates such a transfer. As part of the transfer process, DDS Brady Farms Ltd accepted all liabilities, requirements and obligations provided for in or arising under the existing licence.

The submitter believes that a baseline report from the applicant is required to conduct this assessment. However, there is no legal obligation for such a baseline report, and I am satisfied that I have sufficient information available to screen the installation out for the baseline report requirement.

This submitter will be informed of the outcome of the Agency's review in the same manner as other submitters, specifically a notification of proposed determination/decision directly to all submitters.

15	Name & Position <i>Mr Peter Sweetman</i>	Organisation: <i>Mr Sweetman & Associates</i>	Date received: 31 August 2015
Issues raised: <p>The submission refers to Article 6.3 of the Habitats Directive which states that:</p> <p><i>'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.'</i></p>			

	<p>The submission quotes UEU Case C-127/02 as follows: "<i>...with each licence entailing a new assessment both of the possibility of carrying on that activity and of the site where it may be carried on, falls within the concept of 'plan' or 'project' within the meaning of Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.</i>"</p> <p>The submission concludes as follows: "<i>Therefore the spreading of organic fertiliser arising from the activity must to be considered under the Habitats Directive.</i>"</p> <p>Agency response:</p> <p>The issue of Appropriate Assessment and the spreading of organic fertiliser is discussed in the relevant sections of this report.</p>
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14. Consultations

14.1 Cross Office Consultation

The Environmental Licensing Programme (ELP) and the Office of Environmental Enforcement (OEE) routinely liaise in relation to the licensing of the intensive agricultural sector. This in part has informed the assessment of this licence review.

No compliance investigations or non-compliances have been raised by OEE for the site in recent years. The last site visit by OEE in November 2018 raised one non-compliance in relation to the unavailability of records.

14.2 Transboundary Consultations

There were no transboundary consultations undertaken as there were no transboundary impacts identified.

15. Appropriate Assessment

In accordance with Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, the Agency must ensure that before a revised licence is granted, that the Agency has undertaken Appropriate Assessment screening.

Appendix 2 lists the European sites assessed, their associated qualifying interests and conservation objectives along with the assessment of the effects of the activity on the European sites.

A screening for AA was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Sites at Glen Lough SPA (site code 004045), Mount Jessop Bog SAC (site code 002202), Lough Iron SPA (site code 004046), Ardgullion Bog SAC (site code 002341), Garriskil Bog SAC (site code 000679), Garriskil Bog SPA (site code 004102), Lough Ree SAC (site code 000440), Lough Ree SPA (site code 004064), Brown Bog SAC (site code 002346), Ballymore Fen SAC (site code 002313), Lough Forbes Complex SAC (site code 001818), Lough Owel SAC (site code 000688), Lough Owel SPA (site code 004047), Ballykenny-Fisherstown Bog SPA (site code 004101), Lough Derravarragh SPA (site code 004043), Fortwilliam Turlough SAC (site code 000448), Scragh Bog SAC (site code 000692), Lough Kinale and Derragh Lough SPA (site code 004061), Clooneen Bog SAC (site code 002348), Derragh Bog SAC (site code 002201), Lough Ennell SAC (site code 000685), Lough

Ennell SPA (site code 004044), Carn Park Bog SAC (site code 002336), Moneybeg and Clareisland Bogs SAC (site code 002340), Lough Sheelin SPA (site code 004065), Corbo Bog SAC (site code 002349), Lough Lene SAC (site code 002121), Crosswood Bog SAC (site code 002337), Wooddown Bog SAC (site code 002205) and Split Hills and Long Hill Esker SAC (site code 001831).

The activity is not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it cannot be excluded, on the basis of objective information, that the activity, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was required.

This determination was made based on the following:

- Air emissions from the installation have the potential for adverse impact on sensitive receptors due to elevated ammonia levels and/or nitrogen deposition at European sites.

An ecological baseline assessment was commissioned by the Agency from a qualified third party and received on 8 November 2022.

An Inspector's Appropriate Assessment has been completed and has determined, based on best scientific knowledge in the field and in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, pursuant to Article 6(3) of the Habitats Directive, that the activity, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site, in particular Glen Lough SPA (site code 004045), Mount Jessop Bog SAC (site code 002202), Lough Iron SPA (site code 004046), Ardgullion Bog SAC (site code 002341), Garriskil Bog SAC (site code 000679), Garriskil Bog SPA (site code 004102), Lough Ree SAC (site code 000440), Lough Ree SPA (site code 004064), Brown Bog SAC (site code 002346), Ballymore Fen SAC (site code 002313), Lough Forbes Complex SAC (site code 001818), Lough Owel SAC (site code 000688), Lough Owel SPA (site code 004047), Ballykenny-Fisherstown Bog SPA (site code 004101), Lough Derravarragh SPA (site code 004043), Fortwilliam Turlough SAC (site code 000448), Scragh Bog SAC (site code 000692), Lough Kinale and Derragh Lough SPA (site code 004061), Clooneen Bog SAC (site code 002348), Derragh Bog SAC (site code 002201), Lough Ennell SAC (site code 000685), Lough Ennell SPA (site code 004044), Carn Park Bog SAC (site code 002336), Moneybeg and Clareisland Bogs SAC (site code 002340), Lough Sheelin SPA (site code 004065), Corbo Bog SAC (site code 002349), Lough Lene SAC (site code 002121), Crosswood Bog SAC (site code 002337), Wooddown Bog SAC (site code 002205) and Split Hills and Long Hill Esker SAC (site code 001831) having regard to their conservation objectives and will not affect the preservation of these sites at favourable conservation status if carried out in accordance with this RD and the conditions attached hereto for the following reasons:

- The installation is not located within a European site.
- The closest European site is approximately 6.3 km away.
- Storm water run-off from the roof and paved areas are directed into the Lenamore stream. There will be no other direct discharge to surface waters or groundwater within the installation boundary.
- There is no surface water pathway within 31 km downstream of the installation

connecting the installation to any of the European sites.

- The storm water collection system will include silt traps on all storm water lines prior to discharge of the storm water from the site.
- The risk of surface water or groundwater contamination because of accidental emissions during washing activities, or from spillage from the wash water tanks, is minimal, given the distance between the activity and a European site and / or given that there is no surface water pathway within 31 km connecting the installation with a European Site.
- Waste generated on-site will be handled and stored in a manner which will ensure there is no risk to European sites and will only be sent to appropriately authorised facilities.
- Organic fertiliser (pig slurry) is and will be used as a fertiliser on farmlands in accordance with the Nitrates Regulations. The licence review, if granted, relates to the site of the activity for which the licence review is made, i.e. the rearing of pigs within the installation boundary, and does not extend to the lands beyond the installation boundary on which organic fertiliser may be used.
- Activities which can take place within European sites are restricted by legislation. All persons must obtain the written consent from the relevant Minister before performing particular operations on, or affecting, particular habitats where they occur on lands or waters within the SACs and SPAs.
- The closest European site is approximately 6.3 kms away from the installation boundary (Glen Lough SPA) and is considered to be outside of the zone of influence of noise emissions arising at the installation.
- The installation is in a rural area where the predominant farming activities involve the rearing of livestock. There are no other licensed installations within a 5 km radius of the installation.
- The licence review is for the update of licence conditions. The required upgrade of this site and reviewed licence will lead to improved environmental standards and efficiencies.
- The licence review proposes a number of mitigation measures which comply with BAT to minimise emissions of ammonia and therefore, nitrogen deposition at the designated sites.
- 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 2, March 2023) in addition to the online screening tool SCAIL Agriculture as part of this Appropriate Assessment Screening Determination.
- Air emissions modelling concluded that there will be no increase in process emissions from the installation. The implementation of BAT at the installation will lead to an overall decrease in emissions.
- Emissions of ammonia and nitrogen deposition from the proposed change to the activity will be lower than those from the existing activity.

In light of the foregoing reasons no reasonable scientific doubt remains as to the absence of adverse effects on the integrity of those European Sites: Glen Lough SPA (site code 004045), Mount Jessop Bog SAC (site code 002202), Lough Iron SPA (site code 004046), Ardgullion Bog SAC (site code 002341), Garriskil Bog SAC (site code

000679), Garriskil Bog SPA (site code 004102), Lough Ree SAC (site code 000440), Lough Ree SPA (site code 004064), Brown Bog SAC (site code 002346), Ballymore Fen SAC (site code 002313), Lough Forbes Complex SAC (site code 001818), Lough Owel SAC (site code 000688), Lough Owel SPA (site code 004047), Ballykenny-Fisherstown Bog SPA (site code 004101), Lough Derravarragh SPA (site code 004043), Fortwilliam Turlough SAC (site code 000448), Scragh Bog SAC (site code 000692), Lough Kinale and Derragh Lough SPA (site code 004061), Clooneen Bog SAC (site code 002348), Derragh Bog SAC (site code 002201), Lough Ennell SAC (site code 000685), Lough Ennell SPA (site code 004044), Carn Park Bog SAC (site code 002336), Moneybeg and Clareisland Bogs SAC (site code 002340), Lough Sheelin SPA (site code 004065), Corbo Bog SAC (site code 002349), Lough Lene SAC (site code 002121), Crosswood Bog SAC (site code 002337), Wooddown Bog SAC (site code 002205) and Split Hills and Long Hill Esker SAC (site code 001831).

16. EPA Charges

The annual enforcement charge recommended in the RD is €3,153 which reflects the anticipated enforcement effort required and the cost of monitoring.

17. Recommendation

The Agency, in considering the review of a licence, shall have regard to Section 83 of the EPA Act. The Agency shall not grant a licence or revised licence unless it is satisfied that emissions comply with relevant emission limit values and standards prescribed under regulation. In setting such limits and standards, the Agency must ensure they are established based on the stricter of either, or both, the limits and controls required under BAT, and those required to comply with any relevant environmental quality standard. The Agency shall perform its functions in a manner consistent with Section 15 of the Climate Action and Low Carbon Development Act 2015 as amended.

The RD specifies the necessary measures to provide that the installation shall be operated in accordance with the requirements of Section 83(5) of the EPA Act, and has regard to the AA. The assessment is consistent with Section 15 of the Climate Action and Low Carbon Development Act 2015 as amended. The RD gives effect to the requirements of the EPA Act and has regard to submissions made.

This report was prepared by Brian Coffey, Philip Stack and Brian Walsh.

I recommend that a Proposed Determination be issued subject to the conditions and for the reasons as drafted in the RD.

Signed



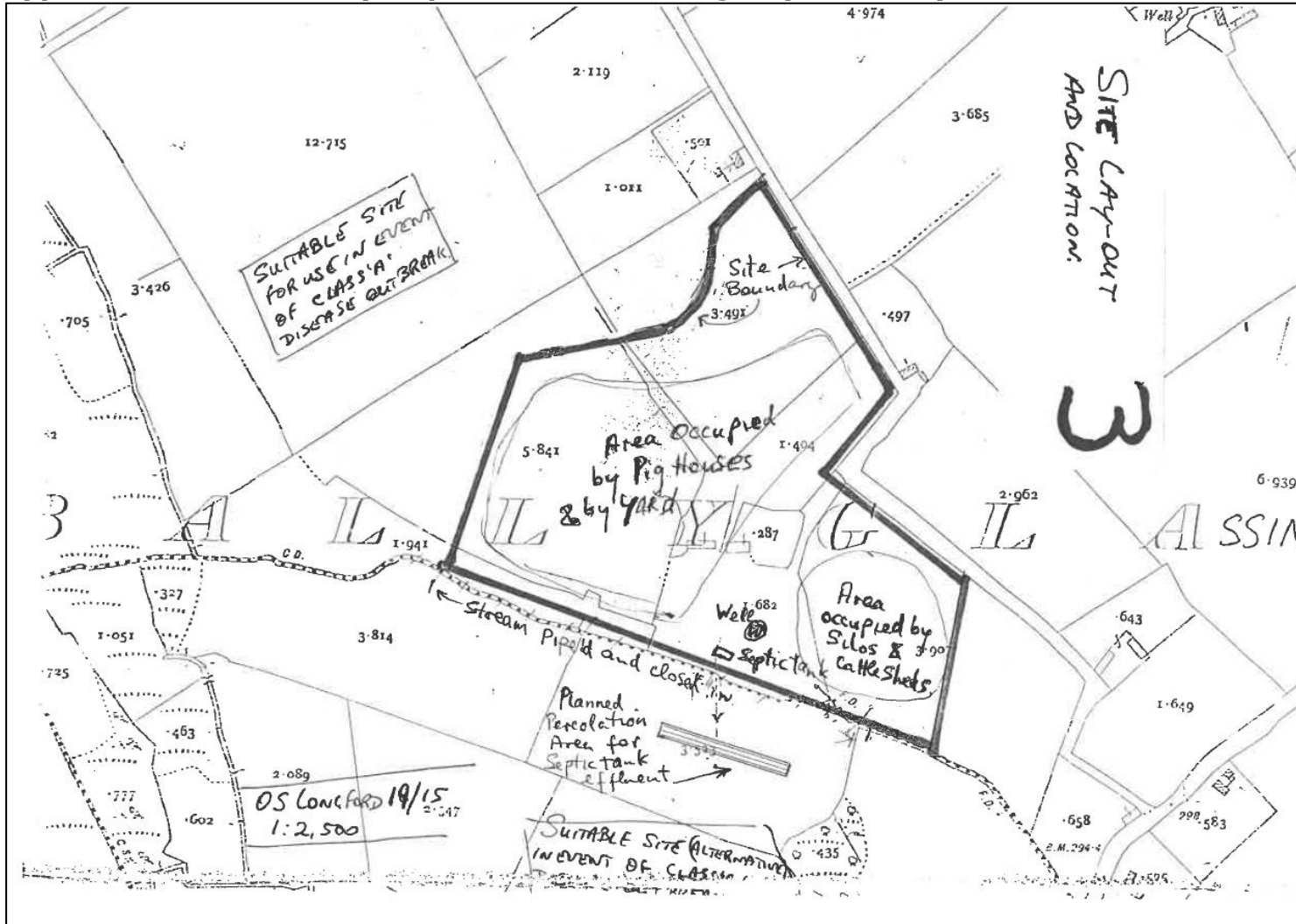
Brian Coffey, ELP Inspector

Procedural Note

In the event that no objections are received to the Proposed Determination on the licence review, a licence will be granted in accordance with Section 87(4) of the EPA Act, as soon as may be after the expiration of the appropriate period.

Appendices

Appendix 1: Site boundary map submitted to the Agency on 28 July 1998.



Appendix 2: AA table

Appendix 2: Table 1 Assessment of the effects of the activity on European sites and mitigation measures conditioned in the RD.

Site Code	Site Name	Qualifying Interests (* denotes a priority habitat)	Conservation Objectives	Assessment
004045	Glen Lough SPA	Birds A038 Whooper Swan (<i>Cygnus cygnus</i>)	NPWS (2022) Conservation objectives for Glen Lough SPA [004045]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 6.2 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Whooper Swan at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002202	Mount Jessop Bog SAC	Habitats 7120 Degraded raised bogs still capable of natural regeneration 91D0 Bog woodland*	As per NPWS (2023) Conservation Objectives: Mount Jessop Bog SAC 002202. Version 1. National Parks and Wildlife Service, Department of	<p><i>This site is located 8.6 km to the northwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
			Housing, Local Government and Heritage.	<p><i>not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004046	Lough Iron SPA	<p>Birds A056 Shoveler (<i>Anas clypeata</i>) A038 Whooper Swan (<i>Cygnus cygnus</i>) A125 Coot (<i>Fulica atra</i>) A140 Golden Plover (<i>Pluvialis apricaria</i>) A395 Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) A052 Teal (<i>Anas crecca</i>) A050 Wigeon (<i>Anas penelope</i>)</p> <p>Habitats Wetlands</p>	NPWS (2022) Conservation objectives for Lough Iron SPA [004046]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 12.1 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Shoveler, Whooper Swan, Coot, Golden Plover, Greenland White-fronted Goose, Teal or Wigeon at this European site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
				<i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i>
002341	Ardagullion Bog SAC	Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration 7150 Depressions on peat substrates of the Rhynchosporion	NPWS (2015) Conservation Objectives: Ardagullion Bog SAC 002341. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>This site is located 13.1 km to the northeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
000679	Garriskil Bog SAC	Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration 7150 Depressions on peat substrates of the Rhynchosporion	NPWS (2015) Conservation Objectives: Garriskil Bog SAC 000679. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>This site is located 13.5 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
				<p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004102	Garriskil Bog SPA	Birds A395 Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>)	NPWS (2022) Conservation objectives for Garriskil Bog SPA [004102]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 13.5 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Greenland White-fronted Goose at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests (* denotes a priority habitat)	Conservation Objectives	Assessment
000440	Lough Ree SAC	<p>Habitats</p> <p>3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation</p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)</p> <p>7110 Active raised bogs*</p> <p>7120 Degraded raised bogs still capable of natural regeneration</p> <p>7230 Alkaline fens</p> <p>8240 Limestone pavements*</p> <p>91D0 Bog woodland*</p> <p>91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae)*</p> <p>Species</p> <p>1355 Otter (<i>Lutra lutra</i>)</p>	NPWS (2016) Conservation Objectives: Lough Ree SAC 000440. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs	<p><i>This site is located 14.3 km to the southwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Otter at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004064	Lough Ree SPA	<p>Birds</p> <p>A061 Tufted Duck (<i>Aythya fuligula</i>)</p> <p>A056 Shoveler (<i>Anas clypeata</i>)</p> <p>A142 Lapwing (<i>Vanellus vanellus</i>)</p> <p>A038 Whooper Swan (<i>Cygnus cygnus</i>)</p> <p>A140 Golden Plover (<i>Pluvialis apricaria</i>)</p> <p>A125 Coot (<i>Fulica atra</i>)</p> <p>A050 Wigeon (<i>Anas penelope</i>)</p> <p>A067 Goldeneye (<i>Bucephala clangula</i>)</p>	NPWS (2022) Conservation objectives for Lough Ree SPA [004064]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 14.3 km to the southwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
		A004 Little Grebe (<i>Tachybaptus ruficollis</i>) A193 Common Tern (<i>Sterna hirundo</i>) A052 Teal (<i>Anas crecca</i>) A053 Mallard (<i>Anas platyrhynchos</i>) A065 Common Scoter (<i>Melanitta nigra</i>) Habitats Wetlands		<p><i>hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Tufted Duck, Shoveler, Lapwing, Whooper Swan, Golden Plover, Coot, Wigeon, Goldeneye, Little Grebe, Common Tern, Teal, Mallard or Common Scoter at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002346	Brown Bog SAC	Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration 7150 Depressions on peat substrates of the Rhynchosporion	NPWS (201c) Conservation Objectives: Brown Bog SAC 002346. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>This site is located 14.8 km to the northwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
002313	Ballymore Fen SAC	Habitats 7140 Transition mires and quaking bogs	NPWS (2018) Conservation Objectives: Ballymore Fen SAC 002313. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.	<p><i>This site is located 16 km to the south of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
001818	Lough Forbes Complex SAC	Habitats 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration 7150 Depressions on peat substrates of the Rhynchosporion 91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*	NPWS (2016) Conservation Objectives: Lough Forbes Complex SAC 001818. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>This site is located 16.5 km to the northwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p>

Site Code	Site Name	Qualifying Interests (* denotes a priority habitat)	Conservation Objectives	Assessment
				<i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i>
000688	Lough Owel SAC	<p>Habitats 3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. 7140 Transition mires and quaking bogs 7230 Alkaline fens</p> <p>Species 1092 White-clawed Crayfish (<i>Austropotamobius pallipes</i>)</p>	NPWS (2018) Conservation Objectives: Lough Owel SAC 000688. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.	<p><i>This site is located 16.7 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for White-clawed Crayfish at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004047	Lough Owel SPA	<p>Birds A125 Coot (<i>Fulica atra</i>) A056 Shoveler (<i>Anas clypeata</i>)</p> <p>Habitats</p>	NPWS (2018) Conservation Objectives: Lough Owel SAC 000688. Version 1. National Parks and Wildlife Service,	<p><i>This site is located 16.7 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
		Wetlands	Department of Culture, Heritage and the Gaeltacht.	<p><i>not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Coot or Shoveler at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004101	Ballykenny-Fisherstown Bog SPA	Birds A395 Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>)	NPWS (2022) Conservation objectives for Ballykenny-Fisherstown Bog SPA [004101]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 16.5 km to the northwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p>

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				<p><i>The project site is not located within the vicinity of any known breeding site for Greenland White-fronted Goose at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004043	Lough Derravarragh SPA	<p>Birds A125 Coot (<i>Fulica atra</i>) A038 Whooper Swan (<i>Cygnus cygnus</i>) A061 Tufted Duck (<i>Aythya fuligula</i>) A059 Pochard (<i>Aythya ferina</i>) Habitats 3180 Turloughs*</p>	<p>NPWS (2022) Conservation objectives for Lough Derravarragh SPA [004043]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.</p>	<p><i>This site is located 17.7 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Coot, Whooper Swan, Tufted Duck or Pochard at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
000448	Fortwilliam Turlough SAC	Habitats 3180 Turloughs*	NPWS (2018) Conservation Objectives: Fortwilliam Turlough SAC 000448. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.	<p><i>This site is located 19.5 km to the west of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
000692	Scragh Bog SAC	Habitats 1393 Slender Green Feather-moss <i>Drepanocladus vernicosus</i> 7140 Transition mires and quaking bogs 7230 Alkaline fens	NPWS (2018) Conservation Objectives: Scragh Bog SAC 000692. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.	<p><i>This site is located 21.4 km to the southeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p>

Site Code	Site Name	Qualifying Interests (* denotes a priority habitat)	Conservation Objectives	Assessment
				<i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i>
004061	Lough Kinale and Derragh Lough SPA	Birds A059 Pochard (<i>Aythya ferina</i>) A061 Tufted Duck (<i>Aythya fuligula</i>)	NPWS (2022) Conservation objectives for Lough Kinale and Derragh Lough SPA [004061]. First Order Site-specific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 21.8 km to the northeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Pochard or Tufted Duck at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002348	Clooneen Bog SAC	Habitats 7120 Degraded raised bogs still capable of natural regeneration	NPWS (2016) Conservation Objectives: Clooneen Bog SAC 002348. Version 1. National Parks and Wildlife Service,	<p><i>This site is located 22.0 km to the northeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
		7150 Depressions on peat substrates of the Rhynchosporion 91D0 Bog woodland*	Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.	<p><i>not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002201	Derragh Bog SAC	Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration	NPWS (2023) Conservation Objectives: Derragh Bog SAC 002201. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.	<p><i>This site is located 22.2 km to the northeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
000685	Lough Ennell SAC	Habitats 7230 Alkaline fens	NPWS (2018) Conservation Objectives: Lough Ennell SAC 000685. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.	<p><i>This site is located 24.2 km to the southeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004044	Lough Ennell SPA	Birds A059 Pochard (<i>Aythya ferina</i>) A061 Tufted Duck (<i>Aythya fuligula</i>) A125 Coot (<i>Fulica atra</i>)	NPWS (2022) Conservation objectives for Lough Ennell SPA [004044]. First Order Sitespecific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 24.7 km to the west of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
				<p><i>The project site is not located within the vicinity of any known breeding site for orchard, Tufted Duck or Coot at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002336	Carn Park Bog SAC	<p>Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration</p>	<p>NPWS (2015) Conservation Objectives: Carn Park Bog SAC 002336. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.</p>	<p><i>This site is located 25 km to the southwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002340	Moneybeg and Clareisland Bogs SAC	<p>Habitats* 7110 Active raised bogs 7120 Degraded raised bogs still capable of natural regeneration</p>	<p>NPWS (2016) Conservation Objectives: Moneybeg and Clareisland Bogs SAC 002340. Version 1. National Parks and</p>	<p><i>This site is located 25.1 km to the northeast of the installation.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
		7150 Depressions on peat substrates of the Rhynchosporion	Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
004065	Lough Sheelin SPA	Birds A005 Great Crested Grebe (<i>Podiceps cristatus</i>) A059 Pochard (<i>Aythya ferina</i>) A061 Tufted Duck (<i>Aythya fuligula</i>) A067 Goldeneye (<i>Bucephala clangula</i>)	NPWS (2022) Conservation objectives for Lough Sheelin SPA [004065]. First Order Sitespecific Conservation Objectives Version 1.0. Department of Housing, Local Government and Heritage.	<p><i>This site is located 26 km to the northeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>The project site is not located within the vicinity of any known breeding site for Great Crested Grebe, Pochard, Tufted Duck or Goldeneye at this European site.</i></p>

Site Code	Site Name	Qualifying Interests (* denotes a priority habitat)	Conservation Objectives	Assessment
				<i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i>
002349	Corbo Bog SAC	Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration 7150 Depressions on peat substrates of the Rhynchosporion	NPWS (2015) Conservation Objectives: Corbo Bog SAC 002349. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>This site is located 26 km to the west of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002121	Lough Lene SAC	Habitats 3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp. Species 1092 White-clawed Crayfish <i>Austropotamobius pallipes</i>	NPWS (2021) Conservation Objectives: Lough Lene SAC 002121. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.	<p><i>This site is located 27.8 km to the east of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
				<p><i>The project site is not located within the vicinity of any known breeding site for White-clawed Crayfish at this European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
002337	Crosswood Bog SAC	Habitats 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration	NPWS (2016) Conservation Objectives: Crosswood Bog SAC 002337. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.	<p><i>This site is located 27.9 km to the southwest of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
002205	Wooddown Bog SAC	Habitats 7120 Degraded raised bogs still capable of natural regeneration	NPWS (2023) Conservation Objectives: Wooddown Bog SAC 002205. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.	<p><i>This site is located 29.2 km to the southeast of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i></p>
001831	Split Hills and Long Hill Esker SAC	Habitats 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)	NPWS (2018) Conservation Objectives: Split Hills and Long Hill Esker SAC 001831. Version 1. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht.	<p><i>This site is located 29.3 km to the south of the installation.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that ammonia emissions from the project site will not cause an impact on the qualifying interest habitats for this European Site.</i></p> <p><i>I am satisfied beyond reasonable scientific doubt that storm water discharges will not cause an impact on this European Site due to the lack of hydrological connectivity of the project site with the European site.</i></p>

Site Code	Site Name	Qualifying Interests <i>(* denotes a priority habitat)</i>	Conservation Objectives	Assessment
				<i>I am satisfied beyond reasonable scientific doubt that ammonia emissions or storm water discharges from the project site will not cause an impact on the conservation objectives for this European Site.</i>

Appendix 3: Relevant Legislation

The following European instruments which have been transposed into Irish legislation are regarded as relevant to this licence review assessment and have been considered in the drafting of the Recommended Determination.
National Emissions Ceilings Directive (2016/2284)
Industrial Emissions Directive (IED) (2010/75/EU)
Environmental Impact Assessment (EIA) Directive (2011/92/EU as amended by 2014/52/EU)
Habitats Directive (92/43/EEC) & Birds Directive (79/409/EC)
Water Framework Directive [2000/60/EC]
Waste Framework Directive (2008/98/EC)
Air Quality Directives (2008/50/EC and 2004/107/EC)
Groundwater Directive (80/68/EEC) and 2006/118/EC
Environmental Liability Directive (2004/35/CE)
Regulation (EC) No 1069/2009, as amended (Animal By-products Regulation)
Nitrates Directive (91/676/ EEC)
Energy Efficiency Directive (2018/2002/EU)

Appendix 4: Other CIDs/BREF/BAT documents relevant to this assessment

Commission Implementing Decisions	Publication Date
COMMISSION IMPLEMENTING DECISION of 15 February 2017 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the intensive rearing of poultry or pigs (2017/302/EU)	February 2017
Sectoral BREF	Publication date
Reference Document on the Best Available Techniques for the Intensive Rearing of Poultry or Pigs	July 2017
Horizontal BREF	Publication date
Reference Document on the Best Available Techniques on Emissions from Storage	July 2006
Reference Document on the Best Available Techniques for Energy Efficiency	February 2009