

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

9th January 2024

**Re: Ashleigh Farms (Waterford) Limited.
Licence Application
Ref. P0447-02**

Dear Sir/Madame,

I refer to your correspondence of 23rd June last in relation to our client, Ashleigh Farms Ltd. Please find detailed below the response to the issues raised.

1. An explanation has not been provided for the low ratio of weaners to sows at the proposed stocking level. At the proposed number of 900 sows and 2,200 weaners, there is a ratio of 2.4 weaners per sow, approximately half the value observed at comparable installations, including the Ashleigh Farms (Waterford) Limited installation with licence ref. no. P1096-01.

You are required to provide an explanation for the weaner to sows ratio at the proposed stocking level and provide documentation to support your explanation where available.

The number of weaners proposed is as per correspondence of 16th December last. As the Agency will appreciate historically the term Weaner was not defined in legislation and typically depended on individual farm housing systems, and varied between farms. A weaner pig could be up to 45 kg depending on the housing system on any particular farm.

As far as the applicant is aware there is no classification of a weaner in IE Licensing legislation, however as a production pig is classed as and from 30kg, the categories of stock on the farm have been revised so as to avoid any double counting. In this instance weaner pigs >30 kg are now referred to as production pigs and have been deducted from weaner pig numbers and added to production pig numbers.

This does not result in any change in the pigs on the farm and is merely a recategorization of the existing pig numbers to reflect legislative terminology.

The applicant notes the Agency's concerns pertaining to the ratio of sows to weaners, and appreciates that sow performance may be different on other farms, however as the Agency are aware the licensee is required to apply for a licence based on the maximum capacity of this farm.

Weaner numbers have been revised in line with capacity on the farm, and, have been categorized in line with the terminology as used by the Agency. In this regard any pigs previously referred to as weaners that were over 30kg are now referred to as production pigs. Any variation in numbers (as detailed further in Point No. 2) is due to this re-categorisation.

- The stock numbers on which the assessment described in the EIS submitted with this application (and the application for the existing licence, P0447-01) are given in Table 1, as are the proposed stocking numbers. The environmental impact of a production pig (finisher) is significantly higher than that of a weaner. Therefore, an environmental impact assessment (EIA) of the installation at the proposed stocking rate has yet to be carried out.

Submit an EIAR for the installation at the proposed stocking capacity, to include an assessment of the likely impacts of the installation's increased odour and ammonia emissions.

Table 1.

<i>Pig category</i>	<i>Sows</i>	<i>Weaners</i>	<i>Production pigs (finishers, fattening pigs)</i>	<i>Boars</i>	<i>Maiden gilts</i>
EIS	900	3,100	4,500	20	65
Proposed	900	2,200	5,500	NA	NA

As previously outlined to the Agency there is no change to the stock numbers on the farm, however the categories of stock have been revised to align with Agency and Legislative Terminology.

In essence the 900 weaners that are over 30 kg, the 65 gilts and 20 boars have been added to the finisher pig numbers (total 985) and added to the finisher pigs (4500) to arrive at the total number of production pigs 5485, rounded to the nearest '00 = 5,500.

<i>Existing Pig category</i>	<i>Sows</i>	<i>Weaners (c. 7 - c. 40kg)</i>	<i>Finishers (c. 40 Kg to sale)</i>	<i>Boars</i>	<i>Maiden gilts</i>
EIS	900	3,100	4,500	20	65

<i>Proposed Pig category</i>	<i>Sows</i>	<i>Weaners (7-30Kg)</i>	<i>Production pigs (30 kg +)</i>	<i>Boars</i>	<i>Maiden gilts</i>
Proposed	900	2,200	5,500 (900 weaners 30-40 kg, 4500 finishers, 20 boars and 65 gilts, rounded to the closest '00)	Incl. with production pigs.	Incl. with production pigs.



CLW Environmental Planners Ltd.

The Mews,
23 Farnham Street,
Cavan,
Co. Cavan

Phone: 049-4371447/9

Fax: 049-4371451

E-mail: info@clw.ie

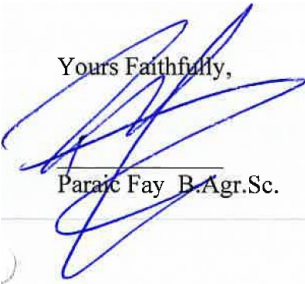
The re-categorisation of weaner pigs (30 kg+), gilts and boars to production pigs does not change the age, range and/or type of pig on the farm (and/or potential impacts) from that as detailed in the EIAR, but merely redefines them under a different categorisation system to concur with Agency used terminology.

3. Any new stormwater sampling point must be located within the site boundary. Revise the location of either the proposed sampling point or the site boundary accordingly.

Please refer to revised drawing attached.

If you require any additional information please contact this office.

Yours faithfully,

Yours Faithfully,

Paraic Fay B.Agr.Sc.