

Office of Licensing, Climate and Resource Use,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

12th March 2024

Re: Doon Farm Enterprises Ltd. ~ Licence Application P1024-02

Dear Sir/Madam,

I refer to previous Agency correspondence of 25th April 2023. Please find the response to the issues raised outlined below;

1. If BAT 30(a.1), a vacuum system for frequent slurry removal (in case of a fully or partly slatted floor), is to be implemented, dedicated **external** storage is required, as required by the Commission Implementing Decision (CID) Establishing Best Available Techniques (BAT) Conclusions For The Intensive Rearing Of Poultry Or Pigs.

You must therefore provide the following information:

- a. The type and capacity of external slurry storage proposed to facilitate implementation of this BAT technique;

External covered storage is to be provided off-site, on the applicant's bovine farm as per the detail as previously submitted. As part of this development 3 No. mass concrete storage tanks are to be provided. The two outermost tanks can be utilised for pig manure storage imported from the applicant's pig farm. Same will be covered and will have a net storage capacity of 1,022 m³ (1086 m³ gross) each. The pig manure can be used on this farm as an organic fertiliser. Alternatively, depending on the time of year the organic fertiliser could be moved direct to customer farms.

- b. Revisions to the on-site slurry storage capacity taking account of the restrictions in depth that would be required in the tanks under Houses A, B, 2.1 and 10.1 and the external slurry storage tank(s) as per point a);

No revisions are required here as the reduced storage capacity has already been accounted for in the information submitted on 06/02/2024, and the farm still has >26 eeks storage capacity remaining. The maximum storage capacity depth of 0.8 m is in keeping with other licenses issued by the Agency.

c. An updated site plan to accommodate additional infrastructure as required;

A revised site plan is not required as no additional infrastructure is proposed on-site.

d. An update odour and ammonia model to account for emissions from the external store, as required.

Same is not required as there is no additional infrastructure within the site boundary.

Please note any proposed external store must also comply with BAT.

2. Regarding the use of low protein feeds onsite. It is noted that protein concentrations in the diets of different categories of pigs vary significantly and that a standard 16% protein ration, as stated in the submitted air modelling report, is not appropriate for all pig categories. Provide the existing and proposed crude protein concentration per pig category to justify the reduced ammonia emission applied. If the reductions in crude protein do not align with those used in the ammonia and odour model to justify reductions in emissions, the model should be updated to reflect the correct values.

As the Agency will be aware the ammonia emissions from a farm are calculated based on published and researched emission factors, and therefore the ammonia reductions as a result of crude protein reductions in the diets are based on reductions from this baseline. As detailed in the report the reduced emission factors (max 30% reduction as is permitted) are achieved at c. 16% CP in the diet, (in essence setting an upper threshold/standard for the farm,), and no additional emission reduction has been sought, or would be allowed by the Agency for any further crude protein reductions below this level.

This is referred to in the revised report enclosed.

If you require any additional information please contact this office.

Yours Sincerely,

Paraic Fay

Paraic Fay B.Agr.Sc.