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

25th June 2024

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

Dear Sir/Madam,

I refer to previous Agency correspondence of 2nd May 2024. Please find the response to the issues raised outlined below;

1. With regards to the proposed slurry store on the adjacent dairy farm.

- a. Is the given volume of 2,044 m³ of slurry storage available exclusively for pig slurry or is it intended that some of this volume would be utilised for cattle slurry?**

It is intended that this pig slurry would be exported to Mr. Charlie Ryan's cattle herd for use on his land. At this point the pig manure has left the pig farm site and is the responsibility of the customer farmer.

Mr. Ryan will have the capacity to store the pig manure separately, or mixed with cattle slurry as he deems best appropriate for use on his land.

As the 2044 m³ referred to is split between two tanks, they will be managed as two separate 1022 m³ tanks to be used by the customer farmer as best integrates with his farming activity.

- b. Should the slurry tank also be used for cattle slurry, demonstrate that sufficient capacity is available for storage of pig slurry, without impairing the ability of the cattle farm to comply with the storage requirements stated in the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2022.**

Please see attached a spread sheet compiled by Mr. Charlie Ryans advisor detailing a shortfall of 11 M³ storage ($24.2 - 13.2 = 11$) capacity on his cattle farm to comply with S.I. 113 of 2022. This does not include the proposed additional storage facilities, of which one of the 3 proposed tanks will more than facilitate this additional requirement.

- c. Confirm the frequency at which slurry will be removed from the pig houses to comply with this BAT technique.

As detailed in previous correspondence slurry will be removed when the level in the tank exceeds 500mm, and prior to it exceeding 800mm to comply with BAT requirements. This is as per other licenses granted by the Agency.

- d. How will the slurry be removed and transported from the pig houses to the slurry stores?

Slurry will be moved by vacuum tanker, and /or submersible pump and lay flat hose to the receiving tank. There will be no physical infrastructure linking the two separate sites/enterprises. DRY Sow House A may also be used for additional slurry storage upon completion of the slurry cooling system (BAT Compliance) subject to Agency Agreement.

- e. Considering that slurry storage is a directly associated activity, which has a technical connection with the licensable activity and is carried out on the site of that activity, as per the EPA Act 1992, as amended, it is required that the slurry stores and associated infrastructure be included within the site boundary.

IN this instance the slurry storage is external to the pig farm and located on a customer farm. It is appreciated that there is a management (not an operational) association between both the exporting farm and importing farm in this instance, however they are two separate activities. This is acknowledged in the Agency's own description as "proposed slurry store on adjacent dairy farm", and is in keeping with previous Agency position taken on this matter.

In keeping with Government Policy and the anticipated 70% storage grant that may be available to importing farmers, additional storage facilities may become available to be supplied by the applicant in the same way, and these will have no connection to the applicant, and in the same way could not be considered to be an associated activity.

The slurry storage is not to be carried out on the site of the pig farming activity, and as detailed / acknowledged above this is a separate activity. Ancillary BAT compliant storage will be available on site with the installation of the colling system in Dry Sow House A, and any excess capacity here can also be used by the applicant to relieve organic fertiliser from the houses where frequent removal is proposed, to meet BAT requirements, and pending subsequent transfer of organic fertiliser to customer farmers. The additional storage capacity is not required to meet the applicant's 26 week storage capacity requirements.

f. Submit an updated site plan to accommodate the additional infrastructure.

Based on the response to Point e, a revised site plan is not required.

2. A crude protein concentration of 16% is not considered a low protein diet for dry sows. Provide the existing and proposed crude protein concentrations of the dry sow diet on-site. The air dispersion model should be updated to reflect the updated values.

Dry sow diets to be revised in line with Bref Spec as per below.

Table 4.13: Indicative crude protein levels in low-protein feeds for pigs

Animal type	Phases	Crude protein content (% in feed)	Remark
Weaner	< 10 kg	19–21	With adequately balanced and optimal digestible amino acid supply
	< 25 kg	17–19	
Fattening pig	25–50 kg	15–17	
	50–110 kg	14–15	
Sow	Gestation	13–15	
	Lactation	16–17	

Source: [43, COM 2003]

Please refer to revised report enclosed.

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

No revisions are required to the non-technical summary.

If you require any additional information please contact this office.

Yours Sincerely,

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