

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

4th July 2024

Re: Tru Poultry P1098-02

Dear Sir/Madam,

I refer to previous Agency correspondence of 1st July last. Please find detailed below the response to the issues raised.

Storm water

1. With regards to storm water management, the following further information is required:
 - a) Provide a map outlining the surface water pathways between the storm water discharge points and the local land drains/watercourses; and
 - b) Identify the location of all storm water discharge points on the site plan and provide grid coordinates (where installed).

Please refer to updated Site Plan enclosed.

Organic Fertiliser

2. With regards to poultry litter/manure (organic fertiliser) to be produced by the activity, provide the following:
 - a) Attachment 7.6.2(a) *Landspreading Controls Agri - Operational Report for the Management of Organic Fertiliser* of the application form.
 - b) In addition:
 - i. Confirm the capacity of each wash water storage tank (total capacity minus the freeboard).
 - ii. Clarify how the 26 weeks' storage capacity requirement will be met.
 - iii. If the storage capacity is to be supplemented by off-site storage, identify the type, capacity and location of the off-site storage.

In order to assist you in compiling this information, a table has been provided. Complete Table 1 in full.

Table 1:

Wash water	Proposed Activity
Number of wash water tanks	<u>2</u>
Capacity of each wash water tank (m ³) (total capacity minus the freeboard)	<u>110.79 & 15.9 (Gross)</u> <u>101.55 & 14.75 (Net)</u>
	<u>Total 116</u>
Type, location and total capacity of off-site storage (m ³) (total capacity minus the freeboard)	<u>N/A</u>
Number of weeks of wash water storage available	<u>161 m3 / Annum</u> <u>37 weeks capacity</u>

Nutrient Deposition rates

- Recalculate nutrient deposition quantities for the free-range areas. The values given in Table 6 of the Nitrates Regulations should be used to calculate the N and P content of the manure deposited by the birds in the free-range area.

Where the N or P loading exceeds the amounts permissible for grassland under the Nitrates Regulations (S.I. No. 605/2017) you are required to address how the requirements of the Nitrates Regulations shall be met in this regard.

In this instance I would not concur that table 6 is the appropriate data to use. Table 6 does not contain reference data for free range broiler production and specifically does not allow for a significant reduction in the number of cycles per annum. The proposed free range production system is limited to c. 5 cycles/annum unlike the conventional broiler system at closer to 7.5.

The figures as presented are based on data contained in S.I. 113 of 2022 and are appropriate for use in this instance. This issue has previously been addressed with the Agency in respect of Licence application Ref. P1044-01 (Submission 10/01/2017), whereby soil samples were taken from the range area of 2 No. existing houses operating under similar management criteria for in excess of c. 10 years. The results obtained demonstrated a very low Soil P (significantly deficient Soil P Level), and based on the results obtained it is safe to say that the lands were being depleted of P due to the crop/silage removal, and thus supporting the position adopted.

Notwithstanding the above the management system can be revised to remove additional cuts of silage off the range area were it to be determined that soil P levels were increasing, above target level (index 3).

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

The logo for CLW Environmental Planners Ltd. features a stylized graphic on the left consisting of overlapping squares in shades of blue and green, intersected by a vertical black line. To the right of this graphic is a solid black horizontal bar containing the company name in white serif font.

CLW Environmental Planners Ltd.

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

Phone: 049-4371447/9

Fax: 049-4371451

E-mail: info@clw.ie

Not required.

If you require any additional information please contact this office.

Yours Sincerely,

Paraic Fay

Paraic Fay B.Agr.Sc.