



### Submission

Submitter:	Mrs Arlene Ward
Organisation Name:	Health Service Executive
Submission Title:	Emission Licence
Submission Reference No.:	S011756
Submission Received:	27 September 2024

### Application

Applicant:	Enfield Broiler Breeders Limited
Reg. No.:	P1214-01

See below for Submission details.

Attachments are displayed on the following page(s).



Environmental Health Service  
Health Service Executive West  
Ashbourne Hall  
Ashbourne Business Park  
Dock Road  
Limerick  
V94 NPEO  
T: 00353 (0)61 461502 / 04 / 05

**Feidhmeannacht na Seirbhíse Sláinte**

**Health Service Executive**

Seirbhíse Sláinte Comhshaoil  
Halla Ashbourne  
Páirc Gnó Ashbourne  
Bóthar an Duga  
Luimneach  
V94 NPEO  
T: 00353 (0)61 461502 / 04 / 05

EPA Environmental Licensing Programme Office  
Environmental Sustainability  
Environmental Protection Agency  
Johnstown Castle Estate  
10th June 2024  
Co. Wexford

Date: 19<sup>th</sup> September 2024

Re: Industrial Emissions License Application

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above license application. If you have any queries regarding this report the contact is Andrew Curtin, Principal Environmental Health Officer at [andrew.curtin@hse.ie](mailto:andrew.curtin@hse.ie)

Yours sincerely

Andrew Curtin  
Principal Environmental Health Officer



**HSE Submission Report  
National Environmental Health Service Consultation Report  
(as a Statutory Consultee (Planning and Development Acts 2000) and  
Regulations made thereunder)**

**Date:** 19<sup>th</sup> September 2024

**Application for:** Industrial Emissions License Application

**Report To:**

Environmental Licensing Programme  
Office of Environmental Sustainability  
Environmental Protection Agency  
Johnstown Castle Estate  
Co. Wexford

**Class and Nature of Activity:** Activity Class 6.1(a), "The rearing of poultry in an installation, where the capacity exceeds 40,000 places.

**Applicant:** Enfield Broiler Breeders Limited, Unit B, Maynooth Business Campus, Straffan Road, Maynooth, Co. Kildare, W23 W5X7

**Location of Facility:** Gorteen, Broadford, Co. Limerick, P56 VH76

**EPA Ref. No:** P1214-01

**EHIS Ref:** 4133

The following HSE Departments were notified of the consultation request for the Planning on 12<sup>th</sup> August 2024:

- Emergency Planning – Kay Kennington
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O'Moore /Ina Kelly
- CHO – Maria Bridgeman

All commitments to future actions including mitigation and further testing have been taken as read, and all data has been accepted as accurate. No additional investigations/measurements were undertaken in the review of this application. The Environmental Health Service has not received any complaints regarding the said existing poultry rearing facility.

**Introduction**

The National Environmental Health Service has not received any complaints in respect of the applicants existing poultry facility. However, it is important to clarify such complaints would be investigated by the Environmental Protection Agency.

In respect of this planning application, the areas reviewed were those of concern to National Environmental Health Department which are:

- Air including odour and noise
- Surface and groundwater
- Waste water, poultry litter and waste management

As this activity falls within the category 6.1(a) of Schedule 1 of the EPA Act 1992 (as amended) an Industrial Emissions Licence is required. This report only comments on Environmental Health Impacts of the Licence application.

The material submitted in this licence application was reviewed with reference to 'BAT Reference Document for the Intensive Rearing of Poultry and Pigs' (2017).

### **Application:**

The site in question is located in a rural area within the townland of Gorteen, Broadford, Co. Limerick. The site is 10.92 hectares in area, and it is accessed via the L1311 road. It is c. 5 km NW of Broadford and c. 5 km SE of Killeedy, Co. Limerick. The activity on the farm is, and will be, a poultry farming activity appropriate to the area and consistent with the Co. Limerick development plan.

Land-use surrounding the site is predominantly agricultural and the main habitat is improved agricultural grassland.

An Application is being made by Enfield Broiler Breeders Limited, Unit B, Maynooth Business Campus, Straffan Road, Maynooth, Kildare. to the Environmental Protection Agency (E.P.A.) for a licence in respect of their poultry farm at Gorteen, Broadford, Co. Limerick. P56 VH76. The application is to increase the capacity of birds residing on the the site; it is proposed to be increased to 70,000 birds.

This enterprise is classed as: Activity Class 6.1(a), "The rearing of poultry in an installation, where the capacity exceeds 40,000 places.

The nearest occupied dwelling house is a distance of approximately 127m to the South East of the site. The next nearest occupied domestic dwelling is c. 183m to the South East of the poultry house.

The main activities at this farm occur during normal working hours between 06.00am and 20.00pm. Stock inspections in line with normal farming practices are and will be carried out every day including weekends and holidays. Automatic feeding and ventilation systems operate on a 24-hour basis and in addition, essential activities may be carried out outside of core working hours.

### **Planning/Site History:**

The existing poultry farm operated by the applicants is located in a rural area in Co. Limerick. The poultry farm has been operated by the applicants since 1998. The existing poultry houses were built in circa 1994/95 and have been in operation since. Planning Application in which the current and proposed activity is based on 94/122

The subject site is an existing development site comprising of poultry housing and existing farming activities. There are no proposed developments in this application. The operation of the proposed activity will be integrated with the operation of the existing farming activities.

The capacity of the site is proposed to be increased to 70,000 birds, exceeding the threshold required for the preparation of an Environmental Impact Assessment Report as per S.I. 600 of 2001 (Planning and Development Regulations 2001), Schedule 5 Part 2 1 (e) (i) as follows: "Installations for intensive rearing of poultry not included in Part 1 of the Schedule which would have more than 40'000 places for poultry".

### **Odour & Noise**

THE National Environmental Health Service (NEHS) notes that the Environmental Impact Assessment dated July 2024 outlines that the proposed activity is unlikely to adversely impact, cause nuisance nor impact amenity beyond the site due to the distance from nearest sensitive receptor. Nevertheless, there is a possible exception of times when birds and/or manure are being removed from the site, which will occur at the end of each cycle, approximately once every 11 months

A number of management practices will be implemented on site so as to minimise potential odour emissions from the proposed development. The NEHS would recommend such measures as outlined in section 6.0 Effects on air are included as **condition** if planning sought should be approved.

Management of operations on the site are imperative to prevent significant pulse releases of odour at times when the effect might be perceptible beyond the site boundary should ensure minimal impact on air in the vicinity of the site.

**The National Environmental Health Service** notes that there is no proposed monitoring for dust or odour at the poultry operation due to the proximity of sensitive receptors within the vicinity of the proposed development.

The National Environmental Health Service would recommends if planning is approved a **condition** should be included that "that if any complaints are received, a follow up investigation will be initiated. This will be initiated as soon as feasible and all results made available to the local authority and any relevant bodies for inspection. In the event that dust or odour from the proposed development is creating an environmental nuisance an ambient dust deposition survey will be carried out by an air quality specialist and mitigation measures will be developed to eliminate the nuisance."

The National Environmental Health service notes further mitigation measures outlined in Section 4.1.2 (Mitigation Measures) in the Environmental Impact Assessment dated July 2024. It is recommended that these measures are included as **conditions** of planning if granted. This is in order to minimise the impact of odour from the facility on the nearest sensitive receptors and is a public health protection measure.

**Noise** levels at the existing poultry facility are low and noise sources at the operation are primarily internal with no expected changes to the external ambient noise environment.

The National Environmental Health Service recommends that a **programme for the inspection** and maintenance (as required) of ventilation fans to minimise any potential impact of noise from the ventilation fans on sensitive receptors.

### **Surface and Groundwater**

The National Environmental Health Service (NEHS) has considered any potential risk of contamination of surface and groundwater and makes the following comments:

The NEHS notes that the Environmental Impact assessment has outlined that “Adverse effect on groundwater from the proposed development should be nil, as there will be no process discharge to ground and any minimal risk of accidental leakage or spillage of polluting liquid on the site.”

Furthermore the EIAR states that all potentially polluting products (fuels, detergents etc.) to be stored in appropriately bunded/secured areas.

The only soiled water from the proposed development will arise due to washing down of poultry houses and adequate storage facilities are in place for this. The volume of water needed for the farm once the proposed activity has been completed will be proportionate to the proposed stock levels. The existing water supply on the farm is from on-farm boreholes which will also serve the proposed activity

As the proposed activity will operate on a dry manure basis, the manure will be removed from the houses at the end of each cycle and removed off site by a licenced contractor and all soiled water will be collected onsite there is minimal risk to groundwater supplies in the area of the site.

**The Environmental Health Service recommends that details are provided of the ‘compost yards/recipient farmers’ receiving the manure and of the address of the land banks to be used for the spreading of manure.**

### **Wastewater, poultry litter and waste management**

It is vital that there is no deterioration in water quality in the watercourses in the vicinity during operation. As per the EIAR dated July 2024 the proposed activity will be carried out on an impermeable concrete base, with proper storm and soiled water separation and collection facilities.

Monitoring of storm water will be undertaken by means of weekly visual and ‘sniff’ testing.

The washings from when houses are being cleaned down are diverted to wash water holding tanks from where the washings or soiled waters are vacuum tankered to available lands for land spreading. Compliance with Section 4.6 ‘Spreading Poultry Manure’ of the EPA’s ‘Batneec Guidance Note for the Poultry Production Sector’ should be included as a condition of planning.

**It is recommended** that high level **monitors are** installed on the **proposed** washwater **tank to reduce** the risk of **accidental overflow**. This is **recommended for the protection of** nearby watercourses and in the interest of the protection of public health.

**The National Environmental Health Service recommends** that the **wastewater** storage tank is **inspected** annually to check for structural integrity.

The primary source of non-hazardous waste produced at the proposed facility is poultry litter, fallen birds and a small quantity of domestic waste. The National Environmental Health Service **recommends** that licensed contractor responsible for the removal of poultry carcasses or reference to facilities for the onsite storage of poultry casualties and all records are maintained regarding disposal. It is **recommended** that containers for the storage of broiler casualties have sufficient capacity and that the containers are of steel construction and are water, pest and topple proof.

**The EHS recommends that the applicant shall be requested to conform with the legal provision of article 23 (4) of S.L 31 of 2014 in respect of "an occupier of a holding shall provide such information as is requested relating to the movement of organic fertilisers on or off the holding". It should be a requirement of any licence issued that all such information is provided to the EPA well in advance of any slurry transportation so that potential land banks can be risk assessed and evaluated for suitability."**

**It is recommended that poultry litter is not removed during periods of heavy rain. This is to reduce the potential contamination of storm water (and ultimately surface and groundwater) and is in the interest of the protection of public health.**

**Due to the increase in the number of birds, it is recommended that the applicant monitors ground nutrients on his lands by way of a Nutrient Management Plan which should be updated annually.**

The National Environmental Health Service further notes the mitigation measures outlined in Section 5.1.5 (Mitigation Measures) in the Environmental Impact Assessment dated July 2024. It is recommended that these measures are included as **condition** of planning if granted as public health protection measures.

### **Pest/Vector Control**

Reference could not be found in the EIAR to the issue of Pest/Vector Control. On a day to day basis the facility should operate a vector control plan to limit/eliminate the potential proliferation of disease vectors such as rodents, flies, and other potential vectors. The NEHS recommends an Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of measures to control vectors in all stages of their life cycle.

### **Climate/Energy**

The National Environmental Health Service (NEHS) recommends that clean water from roofs and yards is collected/harvested in attenuation tanks for example, to maximise water efficiency and limit potential discharges that may cause flooding in the local area. This is in the context of climate change where the frequency and intensity of precipitation is expected to increase as global temperatures increase. Consideration should be given going forward to renewable energy sources. Renewable energy is energy produced from sources like the sun and wind that are naturally replenished and do not run out. Renewable energy can be used for electricity generation, space and water heating and cooling, and transportation.

### **Conclusion**

## Conclusion

**In respect of this planning application, the National Environmental Health Service recommends that-**

- The odour mitigation measures outlined in 'Mitigation Measures' are included as conditions of planning if granted.
- The abstraction well is not used for both a drinking water supply for the domestic dwelling and for **activities** related to poultry rearing.
- High level monitors are installed on the proposed washwater tank to reduce the risk of accidental overflow.
- The waste water storage tank is inspected annually to check for structural **integrity**.
- Containers for the storage of broiler casualties **have** sufficient **capacity and** that the containers are of steel construction and are water, pest and topple proof.
- High level monitors are installed on the **proposed** washwater tank to reduce the risk of accidental overflow.
- Waste water storage tank **is inspected annually to check** for structural integrity.
- It is recommended that a formal complaints procedure should be outlined to resolve any possible issues or community concern in relation to traffic, dust, water, noise, odour or nuisance complaints.
- Impervious concrete is provided throughout the site where necessary to enable the full collection of surface water to the surface water collection network.
- No contaminated material is stored on a site in a fashion that may undermine the environmental security of the collection system.
- All drains, guttering and other collection apparatus must be inspected at regular intervals.
- Inspections and maintenance programs for tanks and pipelines should be initiated to mitigate against the risk of leakage.
- Functional high-level alarms and holding tank security
- High level over-flow collection where applicable – in particular a vacuum tanker should be on site as back-up during the washing process
- Valves should be placed at water diversion points to give added protection while unloading soiled water tanks.
- It is vital that there is no deterioration in water quality in the watercourses in the vicinity during operation hence all activities on site to be carried out be in accordance with the Department of Agriculture, Food and Marine, Bord Bia, EPA, and Limerick City & County Council specifications and/or industry standards.
- All organic fertiliser generated on the site to be removed by a registered contractor for use elsewhere.
- All soiled water to be appropriately collected, stored and utilised in accordance with the requirements of S.I. 605 of 2017 (as amended).
- All potentially polluting products (fuels, detergents etc.) to be stored in appropriately banded/secured areas.
- Stormwater discharge points to be checked and inspected regularly for any sign of contamination

Providing the development is kept as per the specifications detailed and operated and maintained as per Department of Agriculture, Food and Marine Guidance, the NEHS is of the opinion that there is adequate protection of Public and Environmental Health in the license conditions.



Arlene Ward.

Arlene Ward  
Environmental Health Officer  
Environment/Climate Change, Network Support Unit (NSU)

**\* All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to: Andrew Curtin**