



Objection

Objector:	Mr Cathal O Donovan
Organisation Name:	C/o C.L.W. Environmental Planners
Objector Address:	The Mews, 23 Farnham St., Cavan, Cavan, Co. Cavan.
Objection Title:	Objection #OS012017 - Applicant objection for Reg No:[P0621-03]
Objection Reference No.:	OS012017
Objection Received:	05 August 2025
Objector Type:	Applicant
Oral Hearing Requested?	No

Application

Applicant:	Carhue Piggeries Limited
Reg. No.:	P0621-03

See below for Objection details.

Attachments are displayed on the following page(s).

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

5th August 2025

Re: Carhue Piggeries Ltd. P0621-03
Cooligboy, Timoleague, Bandon, Co. Cork
Objection to Proposed Determination issued 09/07/2025

Dear Sir/Madam,

I refer to previous Agency correspondence of 9th July last.

The applicant has thoroughly reviewed and considered the conditions proposed in the PD as issued in this regard. As a result of this review one condition in particular has been highlighted by the applicant (Condition 6) and is felt by the applicant to be both;

- 1) an unnecessary restriction on this activity, and,
- 2) an incorrect interpretation of reports submitted as part of this application.

Point of Objection: Condition No. 6 seeks to specify the nature and extent of mitigation measures to be implemented on the farm, contrary to that which was proposed in the documentation submitted in support of this application.

AS outlined in the accompanying correspondence from Katestone the following mitigation measures were proposed, and included in the modeling calculations;

- Low protein diets,
- Frequent removal of slurry.

While slurry cooling may have been referred to in previous iterations of the modelling report, same was not carried forward into the final report, as;

- Compliance with E.P.A. requirements was achieved and demonstrated without this 3rd mitigation measure.
- In accordance with E.P.A. guidance credit is only given for 2 mitigation options (2nd at a reduced rate) and there is no additional credit given for additional mitigation.

In the assessment of the application, and as detailed in the inspectors report, it was understood that low protein diets and frequent removal of slurry would be used in all tanks, as detailed in sections 6.1.4 and 6.1.5 of the report. This is in keeping with the proposals as submitted to the Agency, and as outlined in the attached correspondence from Katestone, and sufficient to comply with Agency requirements and guidance.

The applicant appreciates that preliminary works have been completed (at the applicant's discretion) to facilitate the implementation of slurry cooling in certain tanks, however at this juncture the full implementation of same is not proposed and as previously detailed is not required to comply with Agency requirements. The applicant may, in the future, and at his discretion, for either operational or economic reasons decide to proceed with slurry cooling, however this decision should be left up to him.

In this regard the applicant feels that the approach adopted by the Agency is unnecessary restrictive and not necessary to meet Agency requirements.


The licensee is requesting that Condition 6.21 be revised to;

- A) detail that frequent removal is applicable to all tanks on-site, and,
- B) provide the discretion for the applicant to implement a slurry cooling system either in lieu of, or in addition to, frequent removal where he feels it may be operationally or economically advantageous.

The approach as outlined above would be in keeping with the modeling reports as submitted and Agency guidance while still providing for the required environmental protections sought by the Agency.

The applicant is requesting that the Agency review the proposed determination with a view to more appropriately aligning with the application documentation, while still providing appropriate environmental protection.

Signed:



Parale Fay
BAgrSc

MEMORANDUM

To	Carhue Piggeries
From	Micheal Fogarty
Client name	Carhue Piggeries Limited
Deliverable No.	D23015-8
Subject	Response to EPA Proposed Determination for Timoleague Piggery (P0621-03)
Date	31 July 2025

Carhue Piggeries Limited operates a pig farm at Cooligboy, Timoleague, Co. Cork in accordance with an Industrial Emissions Licence (IEL) issued by the Environmental Protection Agency (EPA) (Licence reference P0621-02). Carhue Piggeries submitted a review application for the IEL on 15 November 2023 (Licence reference P0621-03).

Katestone completed an odour impact assessment (OIA) and an ammonia impact assessment (AIA) that were submitted as part of the review application for the IEL.

EPA reviewed the application and on 9 July 2025 proposed to grant a revised licence to Carhue Piggeries (Proposed Determination). Carhue Piggeries has the option to submit comments on the Proposed Determination.

The Proposed Determination includes the following statement:

Emissions to air will be mitigated through inclusion of abatement (including the use of low protein feed, slurry cooling, frequent slurry removal to an anaerobic digester); imposing emission limit values to comply with the CID; and implementing monitoring, maintenance and control measures,

In addition to this statement, Condition 6 of the Proposed Determination states:

6.1 Test programme - Animal house numbers specified below are as per the drawing titled "Carhue Piggeries Ltd. General Arrangement" received by the Agency as part of the application on 31 May 2024. The licensee must prepare a test programme for the slurry cooling with heat recovery system installed in the new animal housing (in pig houses 20, 2L, 22, and 23) to control emissions to atmosphere.

Carhue Piggeries would like references to slurry cooling in the Proposed Determination to be removed.

The new sheds at the pig farm will operate shallow tanks and implement frequent slurry removal to reduce emissions of odour and ammonia. The plumbing and pipe network, required to facilitate slurry cooling, was installed as part of the construction of the base of each tank in the new sheds as it is not practical to retrofit this infrastructure after the concrete tanks base has been poured. A significant amount of additional infrastructure is required to implement slurry cooling including above ground plumbing and heat exchange equipment that was not installed during construction. The plumbing and pipe network was installed as a contingency to facilitate slurry cooling if it was determined to be a necessary emissions abatement technique. The OIA and AIA determined that slurry cooling was **not** a necessary emissions abatement technique as detailed in the next section and it was therefore not implemented as part of this licence application. Further detail is also provided in Attachment A.

The AIA and OIA demonstrate that compliance of the pig farm with all relevant limits/thresholds including the relevant odour assessment criteria or ammonia assessment criteria is:

- **Not** reliant on slurry cooling
- Entirely achieved with the requirements specified in the Proposed Determination for:
 - Dietary manipulation
 - Operation of shallow tanks with frequent slurry removal.

The requirements specified in the Proposed Determination in relation to slurry cooling are entirely unnecessary to meet the requirements of the relevant assessment criteria in relation to odour and ammonia.

The abatement techniques that should be referenced and conditioned for all old and new sheds at the Proposed Determination are:

- Dietary manipulation
- Operation of shallow tanks with frequent slurry removal.

If you have any questions please do not hesitate to contact the undersigned.

Kind regards,

Micheal Fogarty

ATTACHMENT A SAMPLE ATTACHMENT

There is no reference to the adoption of slurry cooling in the OIA. A reference to slurry cooling in the AIA was an error as explained below.

A1 Reference to Slurry Cooling in the OIA

The OIA states:

The odour emission mitigation measures that will be employed at the pig farm include:

- *Manipulation of dietary protein and supplements (new and old housing units).*
- *The use of reduced manure volume pit and the frequent removal of slurry (new and old housing units)*

There is no reference to slurry cooling being adopted in the OIA.

A2 Reference to Slurry Cooling in the AIA

The AIA states:

Ammonia emissions from the new housing units will be lower than the upper limit of the BAT-AEL range as the design and operation of the new housing units include multiple BAT technologies. The new housing units will be operated with the following ammonia emission controls:

- *Shallow pit (manure levels maintained below 600 mm) housing units, with frequent slurry removal.*
- *Diets formulated with optimised protein content, to limit emissions*

The AIA does however state

The first two ammonia emission controls ensure that the new housing units will operate in accordance with the requirements of BAT 30 in the BREF for IRPP. The use of slurry cooling at the new housing units will significantly reduce emissions of ammonia, as identified in the BREF for IRPP.

This statement is relevant to an older draft of the AIA, when slurry cooling was being considered and was included in error in the final draft of the AIA.