

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

19/08/2025

RE: Enfield Broiler Breeders, Licence application Reg. No. P1214-01

RFI response

Dear Mr. Stack and to whom it may concern,

I refer to previous correspondence on 11th December 2024.

Firstly, We request that the proposed bird numbers under this application be reduced to 61,800 birds.

1. *Has the licensable activity commenced on-site (i.e. at a stocking level of >40,000 birds)?*

No

2. *It is noted that the documentation regarding the BAT conclusions from the Commission Implementing Decision (CID) document for the Intensive Rearing of Poultry or Pigs (2010/75/EU, Feb 2017) has not been fully completed. Clearly identify the **specific techniques** that will be used to comply with BAT 10, 13, 25, and 31.*

Please see separate document attached.

3. **Organic fertiliser**

- a. *Provide a letter from the contractor who will remove the litter from the installation confirming their agreement with the applicant. This letter should include the following:*
- i. *The contractor's DAFM registration details;*
 - ii. *Confirmation that the contractor will remove all poultry litter from the installation; and*
 - iii. *Assurance that the transport of poultry litter will be in accordance with the Animal By-product Regulations.*

See letter attached

- b. Is poultry litter removed solely at the end of 44-week production cycle? **YES**
- c. Does the storage capacity described in Table (b) Poultry Manure/Farmyard Manure Storage Capacity, in section 7.6.2(ii) Organic Fertiliser: Storage capacity of the application, describe litter on the floor of the poultry houses while the houses are occupied by the birds or separate litter storage facilities within the houses?

Storage capacity relates to litter on the floor within the houses only. No separate storage facilities are on site nor are they required.

- d. Is the 10.92 ha of land the applicant intends to use for landspreading of wash water located within the proposed licensed site boundary? If so, calculate the additional nutrient load arising from this landspreading and demonstrate that the requirements of the Nitrates Regulations (S.I. No. 605/2017) shall continue to be met.

Washing Procedure will generate 180m³ of wash water.

Assuming 5% total solids mixed with layers manure @ 13.7kgsN/m³ and 2.9kgsP/m³ – (based on SI 393 of 2022)

$180 \times 13.7 \times 5\% = 123.3\text{kgN}$ with 50% availability = 61.65kg N fertilizer equivalent applied

$180 \times 2.9 \times 5\% = 26.1\text{kgP}$ with 100% availability = 26.1kgP fertilizer equivalent applied.

Summary:

Hydraulic loading $180\text{m}^3/10.92\text{ha} = 16.48\text{m}^3/\text{ha}/\text{annum}$ (1467gallons/acre)

N $61.65\text{kg}/10.92\text{ha} = 5.64\text{kg}/\text{ha}/\text{annum}$

P $26.1\text{kg}/10.92\text{ha} = 2.39\text{kg}/\text{ha}/\text{annum}$

No stock are grazing the holding.

Based on a 1-cut silage system, the above N&P applications equate to 5% and 12% of the respective N and P crop requirements – (based on P index 3)

4. Will the installation be operated on a free-range basis? If so, calculate the N and P content of the manure deposited by the birds in the free-range area using the values for a laying hen given in Table 6 of the Nitrates Regulations. Demonstrate that the requirements of the Nitrates Regulations (S.I. No. 605/2017) shall be met. **No and apologies for incorrect wording previously. This is a non-caged deep litter system where the birds remain within the houses for the entire production cycle.**
5. For what proportion of the day are the birds permitted access to the range area? **Not Applicable**
The birds do not have access to the outdoors

6. *Provide a map showing the location of nearby third-party dwellings. If any nearby dwellings are owned by the applicant or their family, this should be highlighted. See attached – neighbouring dwellings shown in red. No nearby dwellings are owned by applicant or their families.*

7. *In relation to sanitary facilities for the site:*

- a. *Confirm if any sanitary facilities are or will be provided within the installation boundary. Sanitary facilities are provided on site*
- b. *Confirm, where applicable, the type of system that is or will be provided for the treatment of sanitary effluent arising onsite and the location of same. Conventional Septic Tank and Soakaway system is in place*
- c. *Where applicable, include the location of any existing or proposed sanitary facilities within the installation boundary in the revised site plan requested in item 1 above. Location of existing facility is shown on site layout plan*

8. **Storm water**

The site plan titled 'Site plan - Storm Water Drainage' and 'Site plan – Clean/Storm Water' outlining the storm water discharge points does not clearly outline the storm water drainage system and the associated infrastructure. Provide a revised site plan map to clarify:

- a. *Provide a map outlining the surface water pathways between the storm water discharge points and the local land drains/watercourses. Site Layout plan enclosed shows water pathways to land drain and adjacent watercourse. There are effectively 4 identical systems in place to take storm water from concrete areas in front of sheds to the open land drain. Once water enters into gully traps in each of the 4 concrete areas it is a sealed system thereafter.*
- b. *Confirm what mitigation measures are proposed for each stormwater discharge point, e.g. silt trap. Schematic drawing for this is enclosed. Conventional silt water trap is to be installed after storm/soiled water diversion point. Silt generated from soiled water during the cleaning process is diverted directly to concrete tanks and removed from there as required.*
- c. *Clarify how clean storm water from concrete aprons is kept separate from wash water. Water diversions manholes (AJs) are in place for each of the 4 concrete*

aprons. All water enters into the gully traps and is then almost immediately diverted to either the storm water discharge system or to concrete tanks as required.

9. Planning

With regards to planning permissions 1227/94, provide written confirmation from the planning authority that the installation has planning permission to:

- a. *change from housing of turkeys to housing of broiler breeders, and*

See Letter from Limerick County Council attached

- b. *to be operated as a free-range installation. This is not applicable as per point 4.*

10. Appropriate assessment

Please find Natura Impact Statement (NIS) attached

A screening for Appropriate Assessment was undertaken on 13 August 2024 and the Agency determined that an Appropriate Assessment of the proposed activity is required. You are thereby required to submit a Natura Impact Statement (NIS), as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended.

If you have any queries, please contact us.

Yours Sincerely,



Ricky Roycroft - BSc Agri.Bus. (Hons.)

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