



CLW Environmental Planners Ltd.

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

20th October 2025

Re: Declan Sullivan. P1065-02

Dear Sir/Madam,

I refer to previous Agency correspondence of 17th October last. Please find detailed below the response to the issues raised.

1. Installation Operation:

- (i) Please confirm expected date of completion of internal refurbishment works at two existing poultry houses to allow the intensification of the activity permitted under planning ref. 24/60366 and the planned date of commencement of operation of the installation at a capacity of 90,000 birds (Regulation 9(2)(i)).

It is hoped to have internal refurbishment works completed by 01/01/2027 with the site stocked at the proposed capacity of 90,000 thereafter.

- (ii) Please confirm the number of employees and other persons working or engaged in connection with the activity following the proposed intensification (Regulation 9(2)(b)).

The farm is and will be operated, managed and staffed by Declan and Mairead Sullivan.

2. Organic Fertiliser: In relation to wash water produced by the activity, please clarify how the 26 weeks' storage capacity requirement will be met (Regulation 9(2)(g)).

Table 1:

Wash water	Proposed Activity
Number of wash water tanks	2
Capacity of <u>each</u> wash water tank (m ³) (total capacity minus the freeboard)	15.9& 25 (Gross) 14.58 & 22.9 net
Type, location and total capacity of off-site storage (m ³) (total capacity minus the freeboard).	2 x 225m3 bovine slatted tanks located adjacent to site.
Number of weeks of wash water storage available	>26 weeks

3. **Water Supply:** Conflicting information regarding the source of water for operation of the installation is provided in the application. Please specify if water is sourced from public water supply, group water scheme and/or a private well located on the farm (Regulation 9(2)(g)).
The water supply is from the Kilkitt water scheme.
4. **Best Available Techniques (BAT):** With regards to Commission Implementing Decision (EU 2017/302) of 15 February 2017 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the intensive rearing of poultry or pigs (CID IRPP), the responses provided to address compliance with a number of BAT are incomplete. Regarding BAT 3, BAT 4 and BAT 10, provide specific details regarding the technique, or the combination of the techniques that will be used (Regulation 9(2)(h)).
- **BAT 3A (Reduce the crude protein content by using an N-balanced diet based on the energy needs and digestible amino acids), and,**
 - **3B (Multiphase feeding with a diet formulation adapted to the specific requirements of the production period) – Generally applicable and in practice on site.**
 - **Low crude protein diets to be used onsite. Phase feeding (Typically 3 diets through the rearing cycle, with reducing crude protein at each stage) to be implemented as appropriate, and in line with processor/nutritionist advice. The BREF document does not prescribe what is considered low protein for Pullet diets and same will be based on nutritionist advice.**
 - **BAT 4A (Multiphase feeding with a diet formulation adapted to the specific requirements of the production period.), and,**
 - **4B (Use of authorised feed additives which reduce the total phosphorus excreted (e.g. phytase)–**
 - **Phase feeding to be implemented as appropriate, and in line with processor/nutritionist advice. Phytase or similar to be used where deemed appropriate.**

Bat 10 C Operational Measures to be implemented. (These include measures, such as:

- i. closure of doors and major openings of the building, especially during feeding time, if possible;
- ii. equipment operation by experienced staff;
- iii. avoidance of noisy activities at night and during weekends, if possible;
- iv. provisions for noise control during maintenance activities;
- v. operate conveyers and augers full of feed, if possible;
- vi. keep outdoor scraped areas to a minimum in order to reduce noise from scraper tractors

As this is an existing poultry farm with no additional building proposed remaining Bat 10 measures not applicable.

5. **Storm Water:** The site plan does not clearly identify the locations of the silt traps associated with storm water discharge points SW 1 and SW 2. Provide a revised site layout map clarifying their location (Regulation 9(2)(k)).

Silt traps not currently installed at the storm water discharge points

6. **Fuel storage:** Provide details of the capacity, location, secondary containment and /or protection measures (i.e. bunding, double walled tank(s), etc.) of any existing/proposed diesel storage facilities and/or integrated fuel storage associated with the back-up emergency generator on-site (Regulation 9(2)(k)).

Generator located off-site and no ancillary fuel storage located on-site.

7. **Waste Generation:** The application contains conflicting information in relation to the waste streams generated by the activity. Confirm whether veterinary waste and fluorescent light tubes will be waste streams at the installation and, if so, provide quantities generated (in tonnes/annum) for each waste stream and describe how it will be, in order of priority, prepared for re-use, recycling, recovery or where that is not technically or economically possible, disposed of (Regulation 9(2)(s) & 9(2)(t)).

Fluorescent tubes have been replaced by LED and will not be applicable forthwith. Veterinary waste is limited to packaging waste and is to be disposed of with the general waste.

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.

NO revisions required.

If you require any additional information please contact this office.

Yours Sincerely,

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Paraic Fay B.Agr.Sc.