

I wish to object to the proposed development for the following reasons -

Dawn Meats documents do not reference Ireland's new CLIMATE ACTION AND LOW CARBON DEVELOPMENT (AMENDMENT) BILL 2021 in its EIAR or FI reports. This is an important piece of legislation brought into law late last year.

Section 8 of the Climate action and low carbon development (amendment) bill 2021 states

8) For the purposes of performing their respective functions under this section, the Minister and the Government shall have regard to the following matters:

(a) the need to deliver the best possible value for money consistent with the sustainable management of the public finances and to maximise, as far as practicable, the net benefits to society taking into account the impact of greenhouse gas emissions;

(b) the need to promote sustainable development and restore, and protect, biodiversity;

(c) relevant scientific or technical advice;

(d) climate justice;

(e) any recommendations or advice of the Advisory Council;

(f) the social and economic imperative for early and cost-effective action in relation to climate change;

And section 9 of the same bill

9. Section 37B of the National Oil Reserves Agency Act 2007 is amended—

by the substitution, in paragraph (d), of the following subparagraphs for subparagraph (iii):

(vi) enhance biodiversity through nature based projects that seek to reduce, or increase the removal of, greenhouse gas emissions or support climate resilience in the State;”

Regarding Section 8 (b) *“the need to promote sustainable development and restore, and protect, biodiversity;”*

Threatened biodiversity is now coming under the spotlight in Ireland and this is reflected in the new Climate Bill. Ireland's State of the Environment Reports 2016 and 2020 by the EPA

(accessed here: <https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report-/>)

shows a declining trend in all sections of Ireland's environment. Meanwhile, meat production is at its peak in Ireland with over seven million cows, 1.6 million pigs, 70 million chickens etc. It's time that Ireland puts biodiversity first and protects this (already protected) SAC, SPA and Gateway to a World Heritage Site.

Meath County Council describes the River Boyne as -

“an area of outstanding natural beauty which is a designated Special Area of Conservation and Special Protection Area, and is the gateway to the World Heritage Site, Bru na Bóinne.”

Page 18 of the main EIAR states -

The proposed discharge to the River Boyne would take place at Ardmulchan, Co. Meath. The proposed treated effluent emissions have been based upon the assimilative capacity of the River Boyne, the current water quality of the River Boyne and comments made by Meath County Council. The assimilative capacity assessment (included as Attachment 9.1) was used to predict the river's ability to accommodate treated effluent discharge of BOD5, Total Phosphorous, Orthophosphate, Nitrogen, Nitrate, Ammonia, Suspended Solids and Oils, Fats and Greases from the Dawn Meats (Slane) facility. **The assessment concluded that the River Boyne would have sufficient assimilative capacity to accommodate the proposed discharge from the Dawn Meats (Slane) facility.**

Page 20 also states –

“There would be no deterioration in water quality as treated final effluent values proposed by Dawn Meats (Slane) have been based upon the River Boyne's assimilative capacity and current water quality”

Yet, according to the National Parks and Wildlife Service, a report in December 2021 concludes that –

“Relevant nutrients and their natural ranges are yet to be defined. However, nitrogen deposition is noted as being relevant to this habitat in NPWS (2013). See also Bobbink and Hettelingh (2011). **Increased nutrients can lead to changes in plant and invertebrate species through competition and subsequent structural changes to micro-habitat.”**

https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002299.pdf

The same report also advises that –

“Alkaline fen has not been mapped in detail for River Boyne and River Blackwater SAC and thus the exact total current area of the qualifying habitat in the SAC is currently unknown.”

This site of European importance, protected under Irish and EU law for its flora and fauna, is not even completely mapped. It should therefore, be against the law to develop any industry that has the potential to disrupt this exceptional ecosystem. For this reason the development should not be allowed to go ahead.

An article from The Journal in December 2021 found that Dawn Meats is one of the highest emitters of greenhouse gases in Ireland.

“ABP and Dawn Meats accounted for just over 7.5% of emissions from the beef sector alone across the EU and UK.”

The same article refers to a report by the EPA examining the agriculture sector and describing environmental reporting -

“Irish processing company Dawn Meats also features in the report. The company’s claims around climate targets and emissions reduction are “hard to examine”, the report found.”

In the FI report, page 32, Dawn Meat claim

“Under its Corporate social responsibility policy, Dawn Meats Group has stated a commitment to putting in place measures to mitigate against the potential impacts of climate change. As part of the Dawn Meats (Slane) IE licencing regime and membership with Origin Green, there is a commitment to improving the facilities resource and energy use on an ongoing basis. The proposed development would form part of improvements to environmental management and impact upon the climate for the Dawn Meats (Slane) facility”

If the EPA can’t decipher their reporting then it isn’t relevant and Dawn Meats can’t claim corporate social responsibility.

This article draws on the fact that Dawn Meats are not reporting their climate targets and emission reductions in a way that is easy to understand, which is against environmental legislation which requires reporting to be unambiguous. The article is referenced below –

<https://www.thejournal.ie/report-meat-and-dairy-emissions-ireland-5624660-Dec2021/>

Page 25 of the EIAR contains a mixture of thoughts on the River Boyne. On the one hand,

“The proposed treated effluent discharge point would be located at the River Boyne, therefore the discharge point would be located within the SAC and SPA sites.”

And further down page 25,

“habitats within the proposed development area generally of either low ecological value or common to the area.”

How can an SAC/SPA site be of low ecological value? The Climate Action Bill protects biodiversity and this EIAR does not. This development should not be allowed.

Page 25 of the report also concludes –

“ it may be necessary to undertake hedgerow removal works during the bird nesting season (1st March to the 31st August)”

This contravenes Section 8 part (b), (c), (d) & (e) of the Climate Action Bill and therefore, the proposed development should not be permitted.

There are 12 other industries of note recorded in the EIAR that already abstract and discharge on the Boyne . That is a massive pressure already on this protected river, therefore it is unreasonable to say that more pressure in the form of an outflow pipe from an abattoir WWTP will have no effect on this area. There are also eight drinking water schemes abstracting water from the Boyne daily.

To conclude, there are a lot of reasons to object to this plan. Dawn Meats EIAR and FI contain hundreds of pages of inaccurate, ambiguous and sometimes incorrect information. Permission for this development would contravene the CLIMATE ACTION AND LOW CARBON DEVELOPMENT (AMENDMENT) BILL 2021 which was not referenced once. Ireland’s biodiversity is being seriously threatened and now we have the legislation to protect it.