



# Eastern Regional Fisheries Board

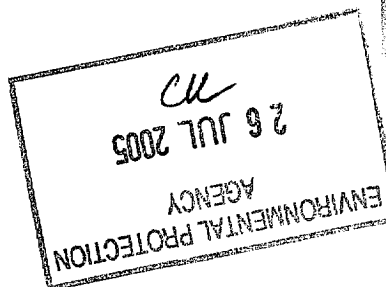
Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland

Our Natural Heritage

Catherine O'Keeffe  
Office of Licensing and Guidance,  
EPA Headquarters  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford.



Your Reference – Reg. No 756  
Our Reference – BB/DD/01

SUBMISSION

July 22<sup>nd</sup>, 2005

**Re: IPPC licence review application – AHP Manufacturing B.V> t/a Wyeth Medica Ireland, Buckley's Cross Roads, Old Connell, Newbridge, Co. Kildare. Reg No 756**

Dear Madam,

With regard to the above IPPC review application, the Board has no objections from a fisheries perspective. However, the following observations are important to highlight in relation to the EIS:

- The ecological integrity of the River Liffey, constituting a highly important salmonid system nationally, must be protected at all times and should not deteriorate in any way as a result of the proposed development.
- Only clean, uncontaminated surface and storm waters must be permitted to discharge to the surface water network in the area so that the salmonid status of local watercourses is protected.
- The physical manipulation of any stream or watercourse (including the riparian zone) contained within the site must first be submitted to the Board for approval.
- The measures outlined in Chapter 8 regarding effluent / stormwater management in the context of protection of receiving waters must be fully adhered to. Ground preparation and associated construction works, including large-scale topographic alteration and the creation of roads and buildings (as proposed), have significant potential to cause the release of sediments and pollutants into surrounding watercourses. Pollution of the adjacent freshwaters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this surface water system. A comprehensive and integrated approach for achieving river and stream

**EPA**

MAIN FILE ✓

PUBLIC FILE ✓x1

EVALUATION FILE ✓KOB

DATE 26/7/05/CK

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Fisheries Board

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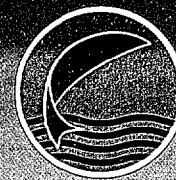
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protection during construction and operation should be implemented. On-site attenuation ponds should allow for the settlement of fine/particulate materials. High class petrol / oil interception and hydro-brake controls should be in place both on individual high risk discharges (e.g. basement car parks) and on primary surface water discharges to protect receiving freshwaters. Silt fencing of discharge streams could also be implemented during the construction phase. Diffuse and point sources of pollution should be addressed and managed by implementing best practice in pollution control in the long term at this site (e.g. Sustainable Urban Drainage Systems guidance). Interception technology efficiency is highly dependent on ongoing maintenance of these structures. A comprehensive long-term maintenance programme should be implemented to service these online features.

- Any utilisation of natural channels in the context of a SUDS approach to surface water discharges should not in any result in a deterioration of water quality or habitat in natural river / stream channels.
- It is recommended that the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" be consulted when undertaking any works on this site, particularly in the vicinity of surface waters. The Board requests that it be informed at least 3-4 weeks in advance of any diversion work to be carried out during channel alterations of any kind.
- Water quality monitoring should be undertaken as described throughout the EIS. Monitoring should be designed to encompass the construction phase to complement the operational surface water protection scheme..
- Appropriate environmental protection measures are the responsibility of the developer and the contractor, and all works are subject to the provision of the Local Government (Water Pollution) Act 1977 (as amended) and the Fisheries (Consolidation) Act 1959 (as amended).

I trust you will take our observations on board when assessing this application.

Yours sincerely,

Brian Beckett

**Fisheries Environmental Officer – Dublin District**

