



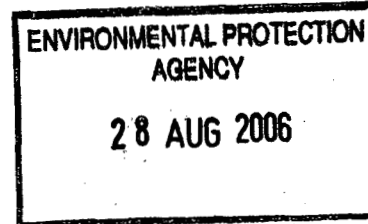
W0232-01
Eastern Regional Fisheries Board
Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage

Ann Bosley
Programme Officer, Office of Licensing and Guidance,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Sub ①



Your Reference – W0232-01
Our Reference – BB/DD/01

August 24th, 2006

Re: Dublin Waste to Energy Project, August 2006.

Dear Ms. Bosley

Regarding the above planning scheme's Environmental Impact Statement and your correspondence dated July 11th, 2006, please find the Board's observations outlined below:

- The development is within the catchment of the River Liffey, one of the foremost salmonid fisheries in this region. The proposed development is located immediately adjacent to the tidal section of this system and has significant potential to impact on aquatic ecology in this area.
- 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 aquatic system from poor on-site construction practices could have a significantly negative impact on the aquatic fauna and flora of this area. A comprehensive and integrated approach for achieving aquatic ecological protection both during construction and operation should be implemented.
- All measures necessary should be taken to ensure protection of local aquatic ecological integrity, in the first place by complete impact avoidance and as a secondary approach through mitigation by reduction and remedy.
- The potential for pollution of the River Liffey from both suspended solids and hydrocarbon elements is significant. On-site attenuation ponds should allow for the settlement of fine/particulate materials. Class 1 petrol/oil interception, silt/grit traps and hydrobrake controls should be in place on surface water

The Eastern Regional
Fisheries Board
15a Main Street
Blackrock
Co. Dublin
T: (01) 278 7022
F: (01) 278 7025
E: info@erfb.ie
www.fishingireland.net





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discharges to protect the receiving aquatic environment. SUDS concepts should be implemented where possible according to international best practice.

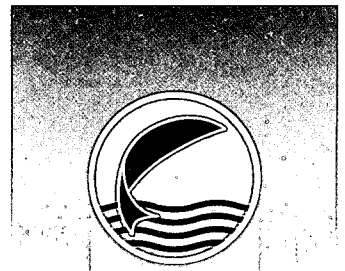
- Significant potential for additional contamination of water exists through the use of biocides at this facility. As suggested in Chapters 12 and 15 of the EIS, biocide and other contaminant levels should be closely monitored during the lifetime of the development (water, sediment and biota monitoring). Should a contamination problem arise, discharge of contaminated water to the River Liffey should cease immediately and alternative disposal or a change in plant practices should be arranged. Standard water quality monitoring should be implemented on all discharges to surface waters according to international best practice. Water quality must be protected at all times.
- 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 in the vicinity of surface water features.
- As rightly identified in the EIS, the Liffey system supports a regionally significant population of Atlantic salmon (*Salmo salar*), a species listed under Annex II and V of the EU Habitats Directive and as such is a species afforded conservation protection as listed under that directive. Estuaries serve as the natural linkage for species such as salmon and sea trout migrating between freshwater and ocean environments, providing the necessary habitat for their transition. Recent research has demonstrated that contaminants derived from agriculture, forestry and intensive in-river aquaculture many of which are also present in sewage and landfill leachate, have significant effects on salmonids and other migratory fish at "sensitive" stages in their life cycle (e.g. reproduction, embryo development, migration and seawater entry). This research has highlighted that the freshwater and marine environments cannot be considered in isolation and that exposure of fish to poor water quality in freshwater and the transitional (estuarine) zone may be a key factor influencing survival of salmonids in the sea. Thus, fisheries ecology is an important element for consideration in any development proposal in this area. Ongoing and comprehensive fisheries monitoring should be implemented (in consultation with the ERFB and Marine Institute) in order to protect local and transient fish population that may be subject to detrimental impacts (water contamination, thermal impact, entrainment mortality) from the development as highlighted in EIS Chapter 15.
- As rightly identified in the EIS, many fish groups are likely to utilise estuarine habitat in the vicinity of the proposed development at some time during their





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life cycle. Thus it is essential to consider the potential impact of the proposal in fisheries, particularly on species of conservation interest. The Board is available for further consultation to ensure representation of environmentally sustainable and sympathetic fisheries targets for freshwater and estuarine habitat and species keeping general biodiversity protection in mind.

Yours sincerely,

Pat Doherty
Acting Chief Executive Officer

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