



**Clew Bay Marine Forum Ltd.**

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PL  
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For direct  
reply.

**Fax sheet 1 of 3  
14.12.07**

**To Ms Mary Kelly. Director General, EPA Wexford.  
053 9160699**

**From Clew Bay Marine Forum Ltd  
098 41616**

Dear Ms Kelly,

Please see the attached letter regarding Mayo County Councils application to the EPA to discharge Landfill Leachate via Westport WWTP. We request that the contents of this letter be taken into consideration during the appraisal stage of MCC's application.

Copies of the letter have also been sent to CBMF members.

Yours truly,

Niall O'Boyle  
Secretary

**SCANNED**  
03 JAN 2008

<b>RECEIVED</b>	
Time	1655
14 DEC 2007	
Signature	
Environmental Protection Agency, HQ. P.O. Box 3000, Johnstown Castle Estate, Co. Wexford.	



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The Manager  
Mayo County Council  
Altamont St  
Castlebar  
Co. Mayo

14<sup>th</sup> December 2007.

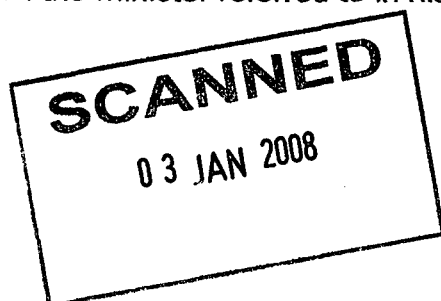
### **Proposed Landfill leachate discharge to Quality of Shellfish Waters area.**

We understand that MCC is again planning to discharge partially treated landfill leachate via Westport WWTP. CBMF have been omitted from the initial stakeholder consultation process, but have been made aware of your letter of 4<sup>th</sup> December initiating a process.

You may recall that CBMF wrote to you on 22.12.06 following the 'emergency' discharge in Dec 2006, outlining our concerns and requesting monitoring data. Unfortunately monitoring data has not been supplied to us & our concerns below remain.

1. We believe that this proposal is in contravention of Article 8 of COUNCIL DIRECTIVE 79/923/EEC. The directive also states that no NEW pollution sources should be brought into a designated area
2. Westport WWTP was not designed to treat landfill leachate & is not effective for that purpose.
3. Landfill leachate is known by MCC & EPA to reduce the ability of WWTP's to treat normal sewage.
4. The reduction of Westport WWTP's excess capacity from introducing landfill leachate increases the likelihood of a storm overflow which may result in sewage & leachate being discharged from the WWTP untreated.

Following the Dec 2006 discharge, CBMF received written confirmation from Minister Browne (DCMNR) that as soon as his Department - as the competent authority - became aware of the practice, they launched an investigation into the discharge following which the Department contacted both the EPA & MCC to remind them of their obligations under SI 268/2006 and asked MCC to consider alternative arrangements for the disposal of leachate in the future. Unfortunately it appears that MCC have not taken on board the full implications of DCMNR's reminder of their obligations under SI 268/2006 which the minister referred to in his reply.



We are particularly concerned at the WWTP's ability to treat Persistent Organic Pollutants (POP's) & other compounds with known abilities to bioaccumulate in shellfish for which discharge standards are not yet available.

Shellfish industries in Clew Bay are in the frontline regarding these types of discharge & sampling and testing techniques for POP's & other contaminants is already a reality. It is therefore essential that treatment is adequate for removal of compounds that can be found in biota. In excess of 100,000 compounds such as PAH's, PCN's, pharmaceuticals, perfluor-compounds, brominated dioxins, other brominated compounds etc. many of which are present in landfill leachate, have the potential to bioaccumulate in shellfish with a variety of toxicities & effects.

Our concern remains that shellfish grown in the vicinity of the discharges will display higher levels of these compounds than would be found elsewhere in relatively pristine West Coast Irish Waters. This would adversely effect market perception & limit the shellfish industry's development of potentially its biggest marketing feature – that of a clean safe product produced in unpolluted waters.

Unfortunately, there was no monitoring of the receiving environment or shellfish during the last discharge and given the stakes; it is not adequate to say that there is no evidence that pollution took place. It is imperative that the facility is deemed fit for purpose, that full consultation take place, that rigorous monitoring of the receiving environment & monitoring of the bioaccumulative effects in shellfish is agreed in advance and implemented prior to any new discharges to Clew Bays QSW's. It is also imperative that discharges cease and amelioration procedures commence should adverse effects be detected.

CBMF's objective in this is to ensure that a rigorous management objective from a food safety aspect is adhered to from the outset & that any new discharges are guaranteed to be 100% safe 100% of the time. It is also our aim to avoid practises becoming established that are in breach of EU legislation. For consumer safety, the sake of the local environment, the avoidance of prosecution of MCC for breaching the Shellfish Waters Directive and to avoid exposing Ireland to more cases for breach of European Law, MCC should reconsider this proposal & only proceed with extreme care. We are most anxious to avoid taking the course of action requested by our members – that of reporting leachate discharge via Westport WWTP directly to the European Commission as a new source of pollution and a breach of the QSW Directive.

CBMF members are available to meet with MCC officials to discuss these matters further.

Yours sincerely,

Niall O'Boyle  
Secretary.

