



Comhshaol, Oidhreacht agus Rialtas Áitiúil  
Environment, Heritage and Local Government

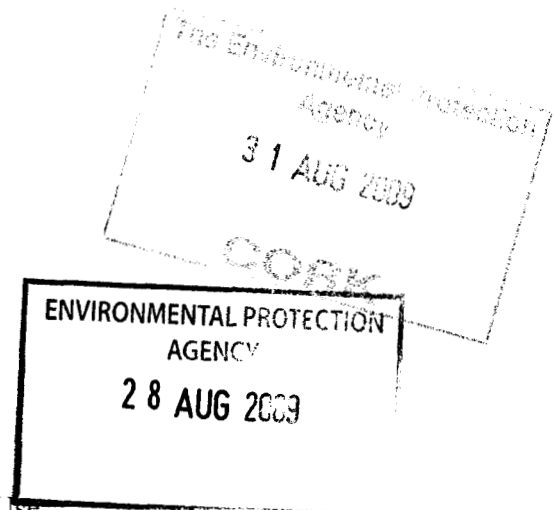
SUB. NO. 1.



26 August 2009

Our Ref: E2009/60  
Your Ref: W0009-03

Ms Maire Buckley  
Office of Climate, Licensing and Resource Use  
EPA  
Johnstown Castle Estate  
Co. Wexford



**Re: IPPC Licence Application for landfill at Balleally, Lusk, Co. Dublin – Fingal County Council**

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A Chara,

We refer to the application for an IPPC licence in relation to the above-proposed development. Outlined below are the nature conservation recommendations of the Department of the Environment, Heritage and Local Government.

Rogerstown Estuary is of high conservation value as recognised by its designation as an SAC and SPA. The water quality of the estuary is already sufficiently low so as to put the estuary at risk of failing to meet requirements under the Water Framework Directive. As the leachate outfall is within a Natura 2000 site it is recommended that an Appropriate Assessment be carried out in order to assess the potential for the leachate discharge to have a significant adverse effect on the qualifying interests and integrity of the designated site. This should include an assessment of the impact the discharge is having on the infauna of the mudflats and sandflats adjacent to the discharge point, which form the food resource for many of the wintering waterfowl.

In light of the previous intention to tanker leachate off-site to local wastewater treatment works, it is recommended this option be assessed as an alternative to discharging it to the Rogerstown Estuary as part of any Appropriate Assessment. In line with the precautionary

principle, it is recommended that ideally no increase above the current licenced Emission Limit Values be granted and that on completion of the wastewater treatment works referred to above, that leachate be moved off-site rather than discharged to the estuary.

Mise le meas,



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Mary Boothman  
Development Applications Unit

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