



An Taisce – The National Trust for Ireland
Tailor's Hall, Back Lane, Dublin 8

Grace O'Brien
Coastal Zone Management Division
Dept of Agriculture, Fisheries and Food
Clogheen
Clonakilty
Co.Cork

REF: E/2/11 Vol 4

**Application by Arklow Harbour Commissioners for a Dumping at Sea Permit for
Arklow Harbour**

20.04.09

Dear Ms O'Brien

Thank you for referring this application for approval to An Taisce for comment. An Taisce wishes to make the following comments in relation to this application.

An Taisce's main concern is the disposal of the contaminated spoil. There are a number of metals present in the sediment in quantities that are deemed to be above the DCMNR Lower Threshold as well as above the DCMNER Upper Threshold. The metals found mainly above the lower threshold include Arsenic, Cadmium, Lead and Nickel, whereas Copper and Zinc are found mainly above the upper threshold. With these metals present in toxic concentrations there will be an impact upon the ecosystem, no matter how carefully the dredging and disposal methods are carried out. Although the heavily contaminated dredged spoil will be disposed of via the 'dig, dump and cover' method, the application, in conjunction with the ecological assessment cannot fully assess the environmental risks.

The application states that the area proposed to dispose of the contaminated spoil is an area of Circalittoral Muddy Sand, which can tolerate the dredged spoil disposal process. However, this does not imply it can tolerate the dredged spoil disposal process of contaminated material.

The ecological assessment states that 'ca 100,000 of material at the disposal site will result in the smothering and destruction of the existing biological community'.

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Considering this project is likely to have a significant impact on the environment, and for the reasons mentioned above, an Environmental Impact Assessment should be carried out. Under Article 1 of the EIA Directive: the 'Directive shall apply to the assessment of the environmental effects of those public and private projects which are likely to have significant effects on the environment'.

Finally, the treatment of the contaminated spoil to remove the toxic concentrations of metals should be a considered alternative. Although this is an expensive option, it will allow for the safe disposal of the de-contaminated spoil and will significantly reduce the impacts upon the site's benthic community.

For the reasons stated above, An Taisce recommends the permit not be granted until the above issues have been adequately addressed.

Please inform An Taisce of the decision and do not hesitate to contact us if you have any queries.

Yours sincerely,

Camilla Keane
Natural Environment Casework and Research Officer
An Taisce
Tailors Hall
Back Lane
Dublin 8

naturalenvironment@antaisce.org

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