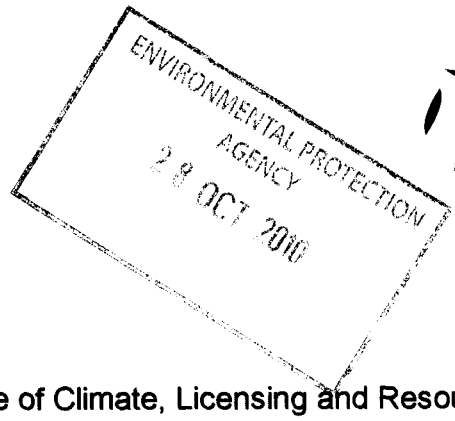


Iascach Intíre Éireann
Inland Fisheries Ireland

Joe Reilly
Programme Officer, Office of Climate, Licensing and Resource Use,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate, Co. Wexford.

Your Reference – W0269-01
Our Reference – BB/DD/170

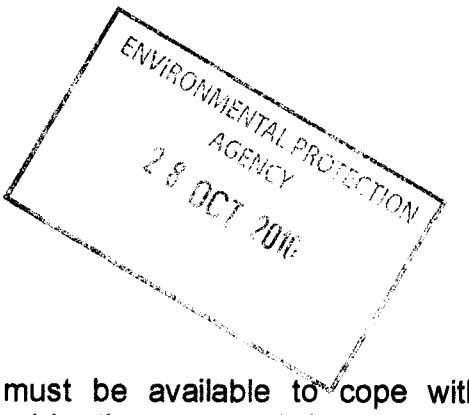
October 26th, 2010

Re: W0269-01 Fassaroe Waste Recovery Facility at Fassaroe Avenue, Bray.

Dear Mr. Reilly,

In relation to the above waste licence application, please find IFI's observations outlined below:

- The proposed development is located in the catchment of the Glencullen / Cookstown River, a tributary of the River Dargle. The Dargle (an EU-Designated Salmonid System) and its tributaries support a nationally significant population of Sea trout (*Salmo trutta*) in addition to a significant and biologically valuable population of Atlantic salmon (*Salmo salar,* listed under Annex II and V of the EU Habitats Directive). Thus, it is vital to note that salmonid waters constraints apply to any development in this area. All proposed works must be designed and implemented in an environmentally sound and sustainable manner and should not impact negatively on the salmonid status of this system.
- Should development proceed, best practice should be implemented at all times in relation to any activities that may impact on surface water (stream and river) or riparian habitats. As with any development, all measures necessary should be taken to ensure comprehensive protection of local aquatic ecological integrity, in the first place by complete impact avoidance and only as a secondary approach through mitigation by reduction and remedy. Only clean, uncontaminated surface waters must be permitted to discharge to the surface water network in the area so that the ecological integrity of the system is protected. It must be highlighted that the release of any leachate into the local surface and groundwater system is unacceptable and must not be permitted to happen under any circumstances.



- Local infrastructural capacity must be available to cope with increased surface and foul water generated by the proposed development in order to protect the ecological integrity of any receiving aquatic environment. It is unclear where it is proposed to discharge foul water from the development (the location of *existing treatment works* is unclear in the application). If the proposal is to treat effluent on site, proper site assessment and full compliance with the EPA Manual on Treatment Systems for small communities, business, leisure centres and hotels is essential. In this scenario, caution is urged in relation to the proposed location of the plant and associated polishing filter and distribution boxes. Hydraulic gradient is a key risk factor at such a site and should be examined closely i.e. the river may be at risk of suffering poor quality recharge from contaminated groundwater as a result of this proposal.
- Ground preparation and associated construction works, including large-scale topographic alteration, importation of waste materials and the creation of roads and buildings have significant potential to cause the release of sediments and various 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 stream protection during construction and operation (in line with international best practice) should be implemented.

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

Yours faithfully,

William Walsh
Director - Eastern River Basin District