

ENVIRONMENTAL PROTECTION AGENCY

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Environmental Licensing Programme EPA, P.O. Box 3000 JOHNSTOWN CASTLE ESTATE WEXFORD.

Your Reference – S0010-01 Our Reference – BB/DD/315

December 3rd, 2010

Re: Dumping at Sea Act 1996 – Howth Yacht Club

Dear Sir or Madam.

Inland Fisheries Ireland has no preliminary objections to the above application for disposal of dredge spoil at sea from operations at Howth Yacht Club.

However, we have concerns regarding the elevation of contaminants such as metals, tributyl tin and hydrocarbons in sediments and urge caution to the applicant in this regard. A precautionary and weight of evidence-based approach is recommended in the Marine Institute's 'GUIDELINES FOR THE ASSESSMENT OF DREDGE MATERIAL FOR DISPOSAL IN IRISH WATERS' (Cronin et al., 2006) and should be applied in this case. Proposed operations must not be deleterious to aquatic life in any way and should in no way impact negatively on fisheries interests. An assessment / monitoring programme of environmental impact at the dumping site (as undertaken in the past) would be prudent as there have been a number of recent dumping permits granted in this area.

Yours faithfully,

William Walsh Director - ERBD