

Iascach Intíre Éireann
Inland Fisheries Ireland

Joe Reilly
EPA - Office of Climate, Licensing and Resource Use
PO Box 3000,
Johnstown Castle Estate,
Wexford.

Your Reference – W0129-03
Our Reference – BB/DD/270

31st January, 2011

Re: Murphy Environmental, Integrated Waste Facility, Naul, Co. Dublin.

Dear Mr. Reilly,

The Corduff (Ballough) River represents a highly significant salmonid catchment. The river is exceptional in the area in supporting a small but biologically significant population of both Atlantic salmon and Sea trout in addition to resident Brown trout populations. This highlights the sensitivity of local watercourses bordering the site in question and the Corduff catchment in general.

The following general comments are important to note:

- The presence of these fish populations highlights the sensitivity of local watercourses. 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 water should leave the development site and drain to the river network. Any river manipulation works (bridging, culverting or otherwise) must first be submitted to IFI Blackrock for consultation and approval.
- Best available technology (BAT) mitigation measures should be implemented to ensure protection of the surface water and ground water system during both construction and operational programmes (as outlined in 10.13.2, 14.8 and 15.5). The maintenance of any attenuation structures (e.g. de-silting operations) must not result in the release of contaminated water to the surface water network. Again and in all cases, it is essential that only clean and uncontaminated surface water should be discharged from the landfill site to the local surface water network. The release of any leachate into the local surface and groundwater system (14.4.5.2) would

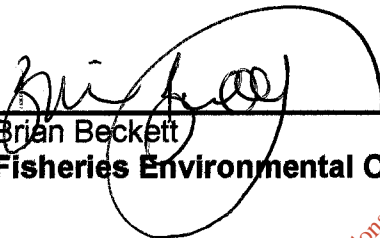
be unacceptable and must not be permitted to happen under any circumstances.

- On-site attenuation ponds should allow for the settlement of fine/particulate materials. Online monitoring and telemetry must provide failsafe and alarm-enabled mechanisms on both foul and surface water discharges in order to protect receiving waters. Class I petrol / oil interception, silt and grit trapping and hydro-brake controls should be in place on surface water discharges to protect receiving freshwaters. Silt fencing (or similar operation) of discharge streams should also be implemented during the construction phase.
- The discharge of clean surface waters to the Corduff River system and any construction works associated with the proposed development must in no way impact on the passage of salmonids thereby contravening Section 173 of the Fisheries (Consolidation) Act 1959, as amended.
- It is recommended that the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" (<http://www.fishingireland.net/>) be consulted when undertaking any works on this site, particularly in the vicinity of surface water features. In-stream works can only be carried out during the period May to September of each year. All in-stream and riparian works must first be submitted to IFI Blackrock in the form of a proposal and method statement for agreement in advance of initiation. Bankside and riparian works should be designed and implemented in an ecologically sound and sustainable way involving consultation with IFI Blackrock.
- Although beyond the remit of this authority, it must be highlighted that it is essential that local infrastructural capacity is 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.
- The commitment to preservation of a 10m wide riparian corridor or 'leave strip' is very important to the protection of local aquatic ecological integrity (and general biological diversity) and should be implemented in full (as per 13.10.2).
- The potentially highly polluting nature of the wastewaters generated at this facility highlights the need for implementation of comprehensive foul and surface water management measures in order to safeguard the ecological integrity of local surface waters. Under no circumstances should there exist the possibility of cross-contamination of the two waste water streams, neither should there be any scope for foul water entry to the local surface water system.

- IFI Blackrock's policy is to maintain watercourses in their open natural state in order to prevent habitat loss, preserve biological diversity and aid in pollution detection. The installation of any wetland feature should be undertaken 'offline' i.e. not created within the boundary of existing surface water channel wetted area.
- When culverts have to be installed it must be highlighted that ongoing maintenance is essential in order to keep these structures debris-free which in turn allows for the free movement of salmonid species as is required under the Fisheries Acts.
- Ongoing intensive monitoring of surface waters will be essential should the review be granted. Both biological and physico-chemical data should be collected for local salmonid surface waters to ensure protection of the ecological integrity of the aquatic system.

I trust you will take our concerns on board and these will be reflected in your final decision.

Yours sincerely,



Brian Beckett

Fisheries Environmental Officer – Dublin District

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