

Sub No. ①

The Environmental Protection
Agency
26 JAN 2012
CORK



Iascach Intíre Éireann
Inland Fisheries Ireland

ENVIRONMENTAL PROTECTION
AGENCY
25 JAN 2012

Sonja Smith
Office of Climate, Licensing and Resource Use
EPA Headquarters
PO Box 3000, Johnstown Castle Estate,
Co. Wexford.

Your Reference – Reg. No. P0301-02
Our Reference – BB/DD/01

January 23rd, 2012.

Re: Reg. No. P0301-02 – IPPC licence review Diageo Ireland, St. James' Gate, Dublin 8.

Dear Ms. Smith,

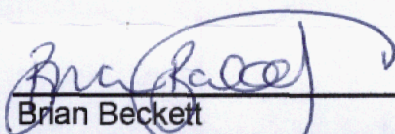
With regard to the above IPPC review, IFI Blackrock has no objections from a fisheries perspective. However, we would ask that the following observations are noted:

- The River Liffey system represents some of the foremost salmonid waters in this region. The Liffey supports a resident population of Brown trout (*Salmo trutta*), a migratory population of Sea trout (*Salmo trutta*) and a healthy population of the 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. The system also supports populations of Freshwater Crayfish and Lamprey (both Habitats Directive Annex II species) in addition to many other fish species.
- The presence of these fish populations highlights the sensitivity of local watercourses and the Liffey catchment in general. The site under review discharges surface water to the Liffey estuary. 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. Developments in the Liffey estuary area have significant potential to impact directly on aquatic ecology in this area and thus impact directly on many populations of fish (riverine, marine, estuarine, and migratory).

- A comprehensive and integrated approach for achieving aquatic ecological protection both during construction and subsequent operation should be incorporated in the planning approach (Environmental Management Systems approach).

I trust you will take our observations on board when addressing this review.

Yours sincerely,



Brian Beckett

Fisheries Environmental Officer – Dublin District

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