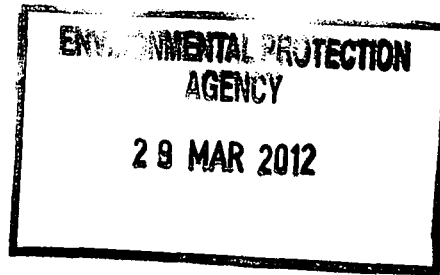




Iascach Intíre Éireann
Inland Fisheries Ireland

Administration,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Our Ref: MK/13c

5^{28th} March, 2012

**Re: Emyvale Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Licence Application
Register No. D0346-01**

Dear Sir/Madam,

We refer to the application made by Monaghan County Council for a waste water discharge licence in respect of the waste water treatment plant at Emyvale, Co. Monaghan.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management and conservation of the inland fisheries resource.

Having examined the application documents we have the following observations to make:

Section F: Existing Environment & Impact of Discharge

We note the monitoring results for the treated effluent relate to dates in 2004-2006 and just two dates in 2009. When assessing the impact of the discharge on the receiving environment it would be more valuable to use current results.

Having carried out a mass balance calculation based on the information provided we noted a potential increase in parameters we assessed, namely BOD, Ammonia and Ortho-phosphate. Therefore, we would strongly urge that recent monitoring results are used in the assessment in order to assess the status of current conditions.

As the EC Environmental Objectives (Surface Waters) Regulations, 2009 have been adopted since the application was made we would suggest that the assimilative capacity calculations in the application should now include comparison with the EQS in the new regulations.

Fisheries value of the receiving water

From a fisheries perspective the Mountain Water is a valuable resource. The river holds good stocks of Brown Trout with spawning and nursery habitat throughout. It should also be noted that the river contains notable stocks of crayfish, *Austropotamobius pallipes*, which is an Annex II species.

Given the value of fisheries/aquatic habitat of the Mountain Water River it is vital that appropriate discharge limits are set in this licence to ensure that there is, at the very least, no deterioration of existing conditions, in accordance with Article 5 of EC Environmental Objectives (Surface Waters) Regs, 2009 (S.I. 272 of 2009), which includes the following provision:

- A public authority shall not, in performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status (or ecological potential as the case may be) of a body of surface water.

We trust you will take our observations on board when assessing this application.

Yours faithfully,

Michael Kivane o.f.s.

PP

William Walsh,
Director – Eastern River Basin District

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