

Environmental Protection  
Agency  
21 JAN 2013

Office of Climate Licensing & Resource Use  
PO Box 3000  
Johnstown Castle Estate  
Co Wexford

Date: 18<sup>th</sup> January 2013

***Re: Application submitted by Dublin City Council for the Disposal of spoil generated by tunnelling of the Ringsend Wastewater treatment works Long sea outfall tunnel commencing early 2014 for a period of 3 years.***

To Whom It May Concern:

We the members of **Dalkey Scuba Diving Club**, Dublin, wish to urge your office to reject the application by Dublin City Council (D.C.C) to grant a permit to allow dumping of tunnelling spoil in Dublin Bay. More than most, our diving members are keenly aware of the fragile eco system that exists in Dublin Bay. We have seen first hand over the past number of years the result of improvements in the water quality and are witness to the abundance of marine life now resident in the Bay. Set out below are the reasons why we believe this non reversible action should not be permitted.

1. The complete design and specification of the tunnel has not been finalised and so it is not possible at this early stage to know the impact this project will have.
2. Dublin Bay is relatively shallow and the tidal streams acting within the bay *do not allow for material dumped within its confines to be easily flushed away.* This material if left suspended in the water column will increase water turbidity and reduce light penetration, thereby possibly affecting phytoplankton and seaweed growth and in turn the animals that depend upon these plants.
3. For us Dublin Bay divers, increased turbidity means reduced underwater visibility making diving dangerous and no longer viable.

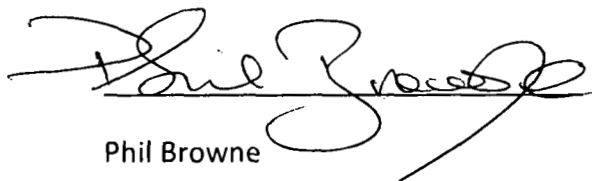
4. We have seen a large increase in the abundance and diversity of marine life in the around Dalkey Island and the Muglands over the past number of years. The spoil from this dumping will smother the seabed killing any benthic fauna and other reef habitats present.
5. We are aware that the Minister for Arts, Heritage and the Gaeltacht has proposed six new marine sites for designation as *Special Areas of Conservation*, *Dublin Bay* being one of these. This plan seems to contravene the spirit of such designation.

As regular users of Dublin Bay, Dalkey Scuba Divers members will be directly affected by this action should it be granted permission. Not only will the **safety of our members** be affected but the **irrevocable damage this dumping** will have on the rich diversity of marine life will greatly reduce the enjoyment of our sport.

In conclusion, the spirit of our sport is to "take only photos, leave only bubbles". It seems incomprehensible that Dublin City Council would consider dumping this potentially damaging material into such a beautiful resource.

**We would ask that you reject this application in the interest of preserving the marine life of Dublin Bay**

Kind regards



Phil Browne

Chairman of Dalkey Scuba Divers, Dublin

90 93 Whitehorn Dr,  
Palmerstown, Dublin 22

CC: Minister Jimmy Deenihan TD, Department of Arts, Heritage and the Gaeltacht, 23 Kildare Street, Dublin 2