



# Comhairle F6-Thuinn Irish Underwater Council

Submission No. 8

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Environmental Protection  
Agency

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Office of Climate Licensing & Resource  
PO Box 3000  
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Co Wexford

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**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:

The Irish Underwater Council are the National Governing Body for underwater sport in Ireland. We have over 80 clubs affiliated to the organisation. These clubs provide training from basic One Star Certification to Diver First Responder, Coxn (boat handling) and right through to Instructor levels, in their local area. Thirty of these Sub Aqua Clubs use Dublin Bay on a regular basis which represents nearly half of our membership.

It has come to our attention the fact that Dublin City Council have submitted an application for a permit to allow dumping of tunnelling spoil in Dublin Bay. We would like to strongly object to this application, we believe if granted it will directly affect all our members especially those that use the Bay on a weekly basis. We believe that this dumping will not only destroy the fragile balance of Marine Life which has been steadily growing in the past number of years, but it will also endanger the safety of our divers due to reduced visibility.

The proposed dumping area lies around 3km south of Howth Head. The tunnel spoil would be dumped from a barge on average around once every day for 3 years. Each barge will contain approximately 2400 tonnes of spoil. It is estimated that around 17% of the spoil will be silt and clay with a particle size of less than 0.06 mm. Therefore, each barge load would discharge in excess of 400 tonnes of limestone silt and clay into Dublin Bay. Section 4.3.1 of the Ringsend Wastewater Treatment Works Effluent Outfall Extension Dumping at Sea Permit Application Supporting Information provides no information at all on the settling time for these smaller particles, even though they are likely to remain in the water column for many hours or possibly days. The impact of these suspended solids has also not been considered. They 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. For divers, increased turbidity means reduced underwater visibility making diving dangerous and no longer viable.

The tidal currents around the proposed dumping area move backwards and forwards, moving north on a flooding tide and south on an ebbing tide. Since dumping would likely be almost



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daily over the three year period, it is likely that turbidity in this area would increase steadily over the period of the works as there would be little opportunity for the suspended fine particulates to disperse.

The larger spoil material, mostly between 2 to 10 mm diameter, would smother the seabed killing any benthic fauna present. Over a period of three years this would have an adverse impact on the various fish species that live and breed in this area.

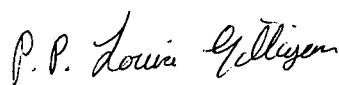
In December 2012, Jimmy Deenihan TD, Minister for Arts, Heritage and the Gaeltacht, proposed that the area from Dalkey Island to Rockabill be designated as a marine Special Area of Conservation (SAC). This designation is primarily due to the large population of Harbour Porpoise living along this length of coastline. An Irish Whale and Dolphin Group survey of this area in 2008 recorded the highest ever acoustic detection rate for this species in Ireland. The Harbour Porpoise is listed on Annex II of the EU Habitats Directive and, as such, Ireland has a responsibility to establish SACs that correspond to the ecological requirements of this species. The proposed dumping site lies within the proposed SAC and the Dumping at Sea Permit Application Supporting Information states in Section 4.3.3 that the spoil disposal would "make this area unsuitable for foraging seabirds and marine mammals for temporary periods, immediately after each discharge of spoil material". However, it is possible that repeated disturbance in the area would make the area unsuitable for marine mammals, such as the Harbour Porpoise, for longer periods of time. The dumping of spoil material within this proposed SAC would greatly reduce the conservation value of the area.

Data on seabirds in the Dumping at Sea Permit Application Supporting Information is based on a 1999 survey of the Kish Bank. This data appears to have little relevance in terms of forming an objective understanding of the ecological impacts of the spoil dumping at the proposed area. This is of particular significance since the dumping has already been stated as being likely to make the area unsuitable for foraging seabirds.

The ethos and code of conduct of our organisation is centered around "take only photos, leave only bubbles". How can we insist that our members adhere to this if those with the responsibility for the management of this important but fragile eco systems are intent on destroying it?

In conclusion, we would ask that your office carefully examine this proposal. The proposed dumping will have an adverse impact on the marine ecology. Furthermore, the Bay belongs to the people of Dublin and to permit such dumping would destroy an amenity and resource that is essential to so many clubs, organisations, and individuals.

Kind regards



Dr Richard Thorn  
Hon. President  
Comhairle F6-Thuinn