



c/o 7, Myra Manor,
Malahide,
Co. Dublin.

21 January, 2013

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

Re: Application submitted by Dublin City Council for the disposal of spoil generated by tunneling of the Ringsend Wastewater Treatment Works' long sea outfall tunnel commencing in early 2014 and for a period of three years.

To Whom It May Concern,

We, the members of Kish Sub Aqua Club, wish to urge your office to reject the application by Dublin City Council (D.C.C) to grant a permit to allow dumping of tunneling spoil in Dublin Bay. Perhaps more than most, our 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 full design and specification of the tunnel has not been decided and so it is not possible at this early stage to know the impact this project will have when all information is not available.
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 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 Bay 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. The fact that this dumping will take place daily over a three year period will prevent any recovery of the Bay during this time and for some time afterwards.
6. 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 year round users of Dublin Bay, our Club 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", and 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 and underwater activity of Dublin Bay.

Yours faithfully,



Fred O'Brien, Chairman
on behalf of Kish Sub Aqua Club

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

