

Bea Claydon

From: Deirdre Greer <deirdre_greer@yahoo.com>
Sent: 29 January 2013 21:17
To: Wexford Receptionist
Subject: DCC dumping at sea permit application

29.01.2013

RE: Dublin City Council's Application for a Dumping at sea permit

Dear Sir / Madam,

This is a formal objection to Dublin City Council's application to the EPA for a dumping at sea permit. I agree extending the existing Ringsend Wastewater Treatment Works is necessary to meet the needs of an increased Dublin population. But the application to dump 824,000 tons of spoil created while drilling inside the Burford Bank because it's the cheapest disposal option is disgraceful.

Sandbanks, estuaries and rocky reef habitats in Dublin Bay are protected under the EU Habitats Directive legislation. Further protected by Natura 2000 these sites include North & South Dublin Bay, Ireland's Eye, Dalkey & Lambay Islands, North Bull Island and the river Tolka Estuary. As recently as last December Minister Deenihan under pressure from the EU to designate marine SAC's, proposed six new sites including a large site from Rockabill to Dalkey Island (reefs and harbour porpoise). These sites were designated to protect marine habitats and species listed in the 1992 EU Habitats Directive. In a statement the department claimed "these six SAC sites will protect a range of habitats and species including sandbanks, reefs, deep sea coral reefs, dolphins off the Atlantic coast and harbour porpoises found in Dublin Bay". The proposed Ringsend Wastewater Treatment Works dump site is within this designated SAC area. According to the EU Habitats Directive, favourable conservation status of a habitat is achieved when its natural range is stable or increasing, and the ecological factors that are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future. Destroying habitats and species in this SAC site goes against the conservation objectives of the EU Habitat Directive and shouldn't be allowed.

Dublin Bay is a shallow mud and sand habitat with rocky reefs off it's islands and headlands. In bad weather these sediments become suspended in the water reducing the visibility. Unfortunately as claimed, suspended materials are not flushed away quickly in the bay's tidal streams, instead they are trapped circulating within the bay and Irish Sea taking a long time to settle.

Dumping a further 824,000 tons of drilled limestone dust and rubble everyday over a three year period will hugely increase sediment suspension, water turbidity and block light penetration. In the wider bay area marine plants and animals that live on these sandbanks and reefs, mostly filter feeders adjusted to living in habitats with some silt, certainly won't survive additional tons of limestone sediment dumped over a prolonged period. The Burford Bank itself is home to borrowing fauna - worms, molluscs & crustaceans and is also a nursery area for juvenile fish. These species living in or near the dump site will be wiped out, a big loss for future marine tourism, fisheries and the overall biodiversity of Dublin Bay.

It has taken ten years from when Ringsend Wastewater Treatment Works was completed in 2003, for the abundance and diversity of marine species to establish itself in the bay. As a resident of Dublin, I have enjoyed the bays many resources and amenities - natural beaches, walking, swimming, sailing, kayaking and diving. It's unbelievable that DCC are proposing to destroy this by applying for a dumping permit in this protected marine area. I'm requesting the EPA to respect the Bay's designated SAC status and consider the consequences if this permit to dump in Dublin Bay goes ahead.

Yours sincerely,

Deirdre Greer

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