

ENVIRONMENTAL PROTECTION
AGENCY

30 JAN 2013

To :

Office of Climate, Licensing and Resource Use,
PO Box 3000
Johnstown Castle Estate
County Wexford

From :

Curragh Sub Aqua Club,
Sandycove, Dun Laoghaire,
County Dublin



27/1/2013

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.

The Curragh Sub Aqua club would like to raise concerns about the proposal by Dublin City council to dump 823,000 tonnes of tunnel waste in Dublin Bay.

The Curragh Sub Aqua club is a diving club located in Sandycove Co. Dublin and members have been actively diving in the Bay and its environs for over 50 years. As divers, we are uniquely aware of the wonderful underwater life in Dublin bay. The Bay is a fantastic amenity and perhaps unique amongst capital cities in Europe and we are concerned at the potential impact this dumping will have on the rich diversity of marine life in the Reef Habitats of Dublin Bay. Since the new sewage water treatment plant was commissioned we have seen the huge improvement in water quality and consequent revival in the underwater environment in the bay.

We have reviewed the DCC application and supporting material and have the following concerns:

1) The DCC argue that because the proposed site is already used by Dublin port to dump spoil from port dredging, this is a justification for saying disposal at sea in this place is already proven as not damaging the environment in the bay. There is a considerable difference in the nature of the waste and the duration of the disposal being proposed here and to suggest that you can extrapolate the effects of sustained dumping over a period of years from the existing dumping of a few weeks duration every two or so years seems dubious.

Up to 20% of the 823,000 tonnes is fine sand, silt and dust which the Council's report states can remain in the water column for hours. We do not think the council's report gives sufficient consideration to the effects of the dumping on areas directly downstream and upstream of the main tidal flows (N-NE and S-SW). It says :

"it is predicted that the volumes of suspended materials reaching the Natura 2000 sites in the

intertidal parts of Dublin Bay are likely to be extremely small and probably not measurable. As current patterns in the area are to a great extent north south, the likelihood of any significant levels of suspended sediments reaching the inner parts of Dublin Bay (Bull Island SPA and South Dublin and Tolka Estuary are 3.4km and 5.7km respectively) is seen as extremely low."

This emphasis on the intertidal areas of the Bay ignores the potential effects on such wildlife habitats as Dalkey Island and the Muglins which are in the direct path of the tidal currents. We are familiar with very low water visibility due to suspended particles when dredging material from the shipping berths is being dumped and when many of the recent pipelines were being excavated across Dublin Bay. Based on our own experiences of the limited dumping of waste in Dublin Bay, we are extremely concerned that the proposal to dump this volume of waste continuously over three years will have a significant impact on the underwater environment around Dalkey Island and the Muglins.

We would also point out that the proposed dump site and environs are within the newly proposed Special Areas of Conservation (SAC) and the Council's application appears to ignore this very important fact.

3) As well as significant wildlife habitats these provide some of the best recreational dive sites on the east coast. They are the back bone of the sport across Dublin and the surrounding hinterland. We do not think the DCC has considered the potential impact on recreation. Increased turbidity not only impacts aquatic life but also increases the risks of diver separation and accidents. This consideration is embedded in the dumping at sea legislation which refers to:

"1. Interference with shipping, fishing, recreation, mineral extraction, desalination, fish spawning and nursery habitats, fish and shellfish culture, areas of special scientific importance, areas of natural or archaeological heritage importance, biological diversity (including diversity within species, between species, and of ecosystems) and other legitimate use of the sea."

4) The DCC study identifies two viable options; land disposal for purposes such as quarry reclamation and disposal at sea. It states:

"it is considered that there are a sufficient number of suitable land based licensed facilities available in the region which will be available to take the spoil material from the LSO tunnel construction."

The costs in the study show that land disposal may not be much more expensive than sea disposal. Land disposal costs range from EUR11 million to EUR18 million and sea disposal in the bay is 10 million. They do not detail why the land disposal range is so great but it does indicate that there may not be that much cost difference.

The primary objection to land disposal centres on the traffic and environmental issues of moving large numbers of trucks from Poolbeg over East Link Bridge and out through the Port Tunnel. Our understanding is the environmental impact study reviewed the impact of traffic removing spoil via the port tunnel and concluded that there was no residual impact.

The report does detail a possible option involving quarry reclamation by Roadstone in Arklow, which has a sea port – this would remove the issue of having to transport the waste in trucks. This option seems to be dismissed by Dublin City Council without sufficient consideration because Roadstone has not agreed to apply for a license for this facility in the absence of a guarantee that a selected contractor would use this facility. We think this option would be the most favourable environmentally.

5) The only “monitoring” being proposed is:

“The contractor will be required to undertake pre and post bathymetric survey of the entire spoil disposal area to compare and record any changes to the seabed level.”

We consider this completely inadequate. If this dumping is permitted we request the EPA require the applicants to monitor the level of suspended sediments in water, particularly along the main tidal flows North East and South West, and to monitor the effects on the underwater environment. There should be agreed limits and dumping must be halted in the event of those limits being exceeded.

In summary, we think this proposal gives insufficient consideration to the impact on Dublin Bay as a whole. The plan overlooks other viable options that should be chosen and provides insufficient proactive safeguards. On behalf of our 50 members the Curragh SAC objects to the proposal to dump the tunnel waste at sea.

Yours sincerely,



David Moore
Chairperson Curragh Sub Aqua Club

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