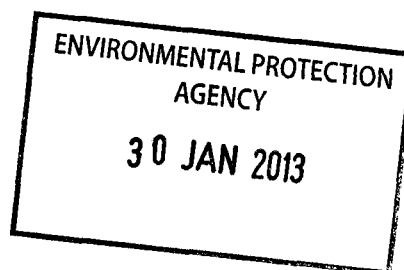




**An Taisce**  
The National Trust for Ireland

20130129-6C-S0018-01

Environmental Licensing Programme,  
Environmental Protection Agency,  
P.O. Box 3000,  
Johnstown Castle Estate,  
County Wexford.



29.01.13

**Ref:** S0018-01  
**App:** Dumping at Sea Permit  
**For:** Disposal of the excavated material generated in the tunnelling operation for the construction of a Long Sea Outfall (to discharge treated effluent from the Ringsend Wastewater Treatment Works)  
**Site:** Dublin Bay

Dear Sir/Madam,

Thank you for referring the above application to An Taisce for comment.

Dublin Bay and North County Dublin has recently been proposed as a Special Area of Conservation (SAC) for the Harbour Porpoise (*Phocoena phocoena*) by the Department of Arts, Heritage and the Gaeltacht due to the high densities of this species recorded in the area.

Article 6 of the Habitats Directive (92/43/EC) requires that any project "likely to have a significant effect" on a Natura 2000 protected site "shall be subject to appropriate assessment of its implications for the site". In line with our obligations under Article 6, An Taisce request that an Appropriate Assessment be carried out for the proposed dumping works prior to granting of a permit for these works. The application must also be considered in conjunction with other environmental impacts on this Natura 2000 site, to ensure that cumulative impacts are considered in line with the requirements of the Directive. An Taisce request a copy of the Appropriate Assessment report, as carried out under Article 6 (3) of the Habitats Directive, for the application, including justification for screening the project out should stage 2 of the assessment not be carried out. However, should stage 2 of the process be carried out and a Natura Impact Statement be submitted to the EPA, we request to view a copy of the NIS report.

An Taisce is also concerned about the level of siltation this proposed activity will produce in the Dublin Bay area. Siltation from re-suspension will reduce light penetration. By impairing light penetration, turbidity limits primary productivity by diminishing the column of water in which light intensity is sufficient for the rate of photosynthesis to exceed the respiration rate. While most estuaries exhibit naturally occurring background turbidity, filling activities may increase those levels beyond environmentally acceptable limits. Every precaution must be taken to ensure the activities do not lead to a significant increase in sediment re-suspension levels.

Siltation has also been recorded remaining in the water column for up to two years post dredging activities therefore, dredging can have devastating consequences. These potential adverse consequences are indicated below:

- I. When such sediment settles to the bottom of the water column, the consequent layer of fine sediment can have a disruptive effect on ecosystem functions, for example making it impossible for invertebrates to feed. Siltation may alter the physical and chemical characteristics of the estuarine environment, which in turn may affect the resident biota.
- II. Benthic dwelling organisms are affected indirectly through sediment composition change. Insect and mollusc larvae populations (bottom dwelling organisms) often do not develop when unable to attach themselves to larger grain sediment.
- III. Siltation caused by dredging and filling has been shown to affect fisheries adversely by reducing or eliminating food supplies, destroying habitat, and eliminating spawning areas or smothering eggs and larvae after spawning has been completed. Fish may also be affected directly by a decrease in visibility, which makes feeding difficult. Coarse particles in suspension may harm fish by causing abrasion of the body surface, which may remove protective mucus and increase the susceptibility to invasion by parasites or disease.
- IV. Increased turbidity caused by dredging and filling also has been shown to affect ambient water quality. Dissolved oxygen concentrations near dredging operations have been revealed to be markedly lower than concentrations measured away from these operations. This may be attributed to re-suspension of bottom sediments, which increases turbidity, settleable and suspended solids, and biochemical oxygen demand.
- V. Siltation is not necessarily limited to those areas near where the activities are occurring and at best will remain within 200-300 metres from the site.
- VI. The proposed dredging activities have the potential to alter the hydrodynamics and the sedimentary regime of the area which will disrupt the pollutant assimilation ability as well as potentially releasing pollutants and causing nutrient enrichment. However, there will be indirect consequences surrounding the activities from the alteration of the local hydrodynamic and sedimentary regime, i.e. these alternations will be significantly larger than the dredge area's and the dumping area's footprint.

For the reasons stated above, An Taisce recommends the permit not be granted until the above issues have been adequately addressed.

Please provide an acknowledgement of this submission, the nature of the decision, the date of the decision, in the case of a decision to grant an approval, any conditions attached thereto, and the main reasons and considerations on which the decision is based, and, where conditions are imposed in relation to any grant of approval, the main reasons for the imposition of any such conditions to An Taisce in relation to this submission as per legislative requirements.

Yours sincerely,

Roisin Kearney  
Natural Environment Office  
An Taisce  
Tailors Hall  
Back Lane  
Dublin 8

naturalenvironment@antaisce.org