

Bea Claydon

From: Rory Keatinge <rory.keatinge@gmail.com>
Sent: 31 January 2013 17:23
To: Licensing Staff
Cc: kdubsky@coastwatch.org
Subject: Fwd: Coastwatch submission to Dublin City Council dumping in Dublin Bay
Attachments: Coastwatch submission.doc

----- Forwarded message -----

From: **Rory Keatinge** <rory.keatinge@gmail.com>
Date: Thu, Jan 31, 2013 at 5:03 PM
Subject: Coastwatch submission to Dublin City Council dumping in Dublin Bay
To: licencing@epa.ie
Cc: kdubsky@coastwatch.org

Hi,

please find attached submission from Coastwatch re Dublin City Council plans.

Kind regards,

Rory Keatinge

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Johnstown Castle Estate
Co. Wexford

Coastwatch Ireland
Trinity College Dublin
Dublin 2

31/01/2013

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

Coastwatch Ireland are deeply concerned about the environmental impact of the above application by Dublin City Council.

Ireland is a signed-up member of the OSPAR Convention (1998) for the Protection of the Marine Environment of the North East Atlantic which prohibits dumping at sea. There are exceptions, including *“inert materials of natural origin, that is solid, chemically unprocessed geological material the chemical constituents of which are unlikely to be released into the marine environment”*.

As we are yet unaware of the exact tunnelling methods and machinery (as the contractor is to be chosen at a later date) we cannot yet claim the material being dumped will be “of natural origin, that is solid, chemically unprocessed geological material”. There are not enough details given by Dublin City Council to render the EIS valid.

However Dublin City Council have claimed *“that recycling for reuse as an aggregate is highly unlikely due to the quality of material and based on experience from the Dublin Port Tunnel and the high dust content of the spoil”*. This claim should confirm that the material is not suitable for dumping at sea under the OSPAR convention and therefore should not be permitted.

We trust the EPA will consider these points and not allow the destruction of a sensitive ecosystem, much of which is part of the Natura 2000 network.

Kind regards,

Rory Keatinge