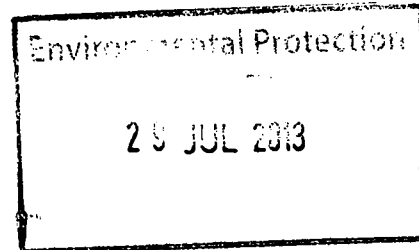




Eve O'Sullivan
Programme Officer
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Your Reference – W0279-01
Our Reference – BB/DD/01

July 25th, 2013

Re: W0279-01 EIS for Rehab Glassco Ltd, Unit 4 Osberstown Industrial Park, Caragh Road, Naas, Co. Kildare.

Dear Ms. O'Sullivan,

In relation to the above EIS, please find IFI's comments outlined below:

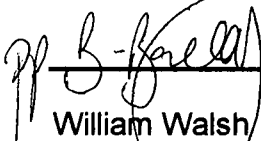
- The development is located adjacent to the main channel of the River Liffey (a nationally important salmonid river). The River Liffey system is exceptional among most in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout in addition to resident Brown trout (both *Salmo trutta*) populations in addition to many other fish species. This highlights the sensitivity of local watercourses and the Liffey catchment in general. The river is regarded as a very important fishery. Fish habitat is regarded as particularly good for all salmonid life stages throughout much of the Liffey system, including the area adjacent to this development.
- As with any development, all measures necessary should be taken to ensure comprehensive protection of local aquatic ecological integrity, in the first place by complete impact avoidance and only as a secondary approach through mitigation by reduction and remedy. Only clean, uncontaminated surface or ground waters must be permitted to discharge to the water network in the area so that the ecological integrity of the surface water system is protected.
- Results for site surface water analysis as presented in Table 10.1 is a concern. Elevated BOD levels should be investigated further, sourced and eliminated as a matter of priority. Remedial measures as stated in section 10.6 should be implemented in full and repeat sampling should be incorporated in any site management plan developed. The incorporation of

a silt pond may not address the BOD issue. This should be considered further by the applicant and addressed in the context of more recent surface water sampling data.

- IFI's policy is to maintain watercourses in their open natural state in order to prevent habitat loss, preserve and enhance biological diversity and aid in pollution detection. All proposed works must be designed and implemented in an environmentally sound and sustainable manner and should not impact negatively on the salmonid status of the Liffey system.
- Best practice should be implemented at all times in relation to any activities that may impact on surface water (stream and river) or riparian habitats. Comprehensive surface water management measures (GDSDS study recommendations) must be implemented at the construction and operational stage to prevent any pollution of local surface waters. Petrol/oil interception (and possibly hydrobrake controls) should be in place on primary surface water discharges.
- Any works directly affecting watercourses or riparian habitats in the area must first be submitted to IFI for assessment and approval (see "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" (www.fishingireland.net/environment)).
- It is essential that the receiving foul and storm water infrastructure has adequate capacity to accept predicted volumes from this development with no negative repercussions for quality of treatment, final effluent quality and the quality of receiving waters.

I trust you will take our comments on board when assessing this application.

Yours sincerely,



William Walsh
Director – IFI Blackrock.