

S0013-02

Comments by Inland Fisheries Ireland



Iascach Intíre Éireann
Inland Fisheries Ireland

Environmental Licensing Programme
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
County Wexford
17 February 2014

RE: Application for a Dumping at Sea Permit
Port of Cork- S0013-02

Environmental Protection
Agency

19 FEB 2014



A chara,

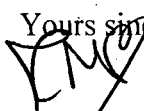
Thank you for your recent notification of the above application.

While IFI appreciates the economic significance of the proposed development, there is also a statutory obligation on IFI to protect and conserve fisheries. It is in this context that we make the following comments on the proposal.

- a) The concentration levels licenced for any parameter should not be at variance with those set out in the Department's "Guidelines for the assessment of dredge material for disposal in Irish Waters" document.
- b) The quantity of dredged material to be dumped should not exceed that licenced on previous occasions for any given year.
- c) Dumping should avoid herring spawning times in November and February, due to the inherent risk set out in the application data.
- d) Dredging should not occur in the salmon draught net fishing season .i.e in the period 12 May to 15th August, in order to minimise the impact on this licenced activity.
- e) IFI would ask that fisheries recommendations of the " Assessment of Benthic and Fisheries Impacts of the Maintenance Dredging in Lough Mahon and the Lower River Lee " Report be adopted as a condition of any licence granted. More specifically the recommendations in relation to further annual sampling and size-frequency distribution studies.
- f) An ecological assessment and species quantification of the dumpsite area should occur pre and post dumping to permit impact assessment.

IFI would ask to be informed when further information is submitted and when a decision is made on this application.

Yours sincerely


Michael Mc Partland.
Environmental Officer.