



Iascach Intíre Éireann
Inland Fisheries Ireland

Environmental Licensing Programme
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford



24 June 2014

RE: Submission by the Inland Fisheries Ireland, Sunnyside House, Macroom, Co.Cork in relation to the application by the Port of Cork Company for a Dumping at Sea Permit in respect of Ringskiddy Port, Co.Cork (S0021-01)

A chara

I refer to the above-mentioned application by the Port of Cork Company.

IFI is a statutory body whose responsibility includes the protection, development and conservation of fisheries in our functional area which includes the subject area of the current application. The application states dredging is required to expand the existing services of the port at Ringaskiddy. IFI recognises the strategic economic and social importance of the proposed project. It is in this context that IFI make the following comments on the proposed development.

While IFI recognises the strategic economic and social importance of the proposed project, unfortunately associated with the development is significant and measurable fisheries losses, as detailed in the Environmental Impact Statement submitted with the application. These losses can be summarized as follows

- a) Removal of an existing mussel bed and intertidal area.
- b) Permanent loss of approximately 3ha of fish and crustacean feeding and nursery grounds
- c) Permanent reduction in the fishing opportunities in Cork Harbour due to the dredging of shellfish habitat.
- d) Disruption of local fishing operations during the dredging phase. IFI would ask that dredging is not permitted during the draft net salmon season.

Items a) to c) above represent a permanent loss of fisheries habitat together with the loss commercial and amenity resource value. IFI would anticipate that local compensatory arrangements would be applicable between commercial interests and the developer should the development proceed.

However of greater concern to IFI is the permanent loss of aquatic habitat identified above. While, as already stated, IFI appreciates the strategic and economic importance of the proposed development, we feel that the substantial and permanent loss of habitat if the development were to proceed must be offset with appropriate counterbalancing measures being applied. Such measures may include enhancement measures in the general Cork Harbour area.

We note that Port of Cork has suggested offsetting the impacts of the development by contributing to an environmental education programme for local primary schools concentrating on the marine environment. While this is a welcome initiative as a partial mitigation measure, no quantification in terms of duration of the programme or financial commitment to fund the programme has been detailed. In the view of IFI any such programme should run in perpetuity since the loss of habitats is permanent.

Additionally IFI would ask that should permission be granted for the proposed development that the following condition should apply

“The total loss to fisheries resulting from the works will be quantified within a six month period and appropriate counterbalancing measures will be agreed between the applicant and IFI so that no net loss to fisheries occurs as a result of the development. This agreement should be finalised within an 18 month period.”

Should you require any more information in relation to this submission please contact the undersigned.

Yours sincerely,



Michael Mc Partland
Senior Environmental Officer.