Sub No. 2

Grainne Oglesby

Subject: FW: Catriona Collins RE:Drogheda Port Company - Proposed Application for EPA Industrial Emissions Licence for the set down of Baled SRF and RDF at Tom Roes Point, Drogheda, Co. Louth (P91011-01)

From: Noel McGloin [mailto:Noel.McGloin@fisheriesireland.ie]
Sent: 12 May 2015 16:32
To: Wexford Receptionist
Subject: FAO: Catriona Collins RE:Drogheda Port Company - Proposed Application for EPA Industrial Emissions Licence for the set down of Baled SRF and RDF at Tom Roes Point, Drogheda, Co. Louth (P91011-01)

Dear Ms. Collins

We are in receipt of your correspondence regarding the above dated 26th February last.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010 .Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource.* Under section 7(3) of the IFI Act it is stated that *without prejudice to subsection (1), IFI shall in the performance of its functions have regard to(g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems),(h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).*

The EU Water Framework Directive (2000/60/EC) entered into force in December 2000 requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis.

Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Also article 28(2) of the said Regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015. This application is on the banks of the River Boyne Estuary whose status is *moderate* and has to be restored to *good* status .

In this submission I am quoting from an IFI submission with regard to the Drogheda Port dredging. In your project the main issues from the fisheries point of view will be any potential leachate and/or effluent from the SRF (Solid Revovered Fuel) and RDF (Resfuse Derived Fuel) making their way to local ground or surface waters. **It is up to the applicants to come with mitigation measures in order to alleviate any serious issues that may impact on fisheries,** especially in the light of increasing the throughput from **150,000** to **500,000** tonnes of SRF/RDF.

Fisheries is to be considered in regard to Annex II species - salmon and migratory lamprey. There is also a valuable recreational angling fishery for bass in the Boyne estuary over its full length. Discoloured water, either from natural sources or dredging, would impact adversely on this fishery. There is no commercial salmon fishery in the Boyne at present. There is a mussel fishery that is currently in a state of recovery following major capital dredging in the early 2000s. All of these fisheries issues require mitigation - not just the European site qualifying interests.

In relation to a past dredging application , a table indicating fish movements in various seasons was compiled (Table 1). This is attached here, with some pertinent amendments.

Table 1. Generalised timing of life stages of relevant migratory fish species using Boyne estuary

Fish sp	EU Status	Life stage	Estuary transit
Atlantic salmon	Habitats - Annex II	Adult upstream migration	All times of year: 'spring' fish; grilse run in June - July
		Smolt downstream run	March - June
Sea lamprey	Habitats - Annex II	Upstream Adult spawning migration	April - July
		Seaward migration of young adults	Autumn - winter
River lamprey	Habitats - Annex II	Upstream Adult spawning migration	Autumn - winter
		Seaward migration of young adults	Autumn - winter
(Shad)	*Habitats - Annex II*	*Adult upstream spawning migration*	*April _ June*
		Larval - young adult downstream migration	Post-spawning gradual downstream dispersal - June - October
Eel	EU Eel Action Plan	Upstream migration of elvers	
		Downstream of adult fish	Autumn
Bass	none	Adult	July - October (optimal angling period - conditions best)

Shad is included in italics as populations are not known to be established. However, individual fish were taken on rod-and-line in the lower estuary in both 2010 and 2011.

Please do not hesitate to contact me should you require clarification on any of the above.

Yours sincerely

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