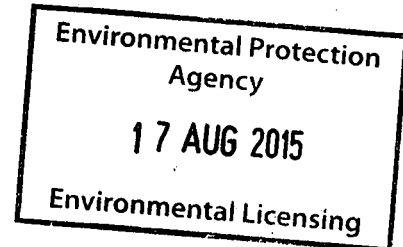




*Marine Institute*  
Foras na Mara

**To: Tara Higgins, EPA**  
**From: Margot Cronin , MI**  
**RE: Sligo County Council, Dumping at Sea application, 2015**  
**Date: 07/08/2015**



**Sligo County Council (Sligo Harbour) S0023-01, received on 03/06/2015**

This is an application to dump 5 500 tonnes of sediment through water injection dredging (WID) and 250 000 tonnes through conventional suction or backhoe dredging. WID is proposed for the most upstream areas and conventional dredging for further downstream.

The sediment chemistry here is 6 years old, which is well outside the OSPAR guidelines of three years (for clean material). I recommend that resampling and analyses should be carried out.

Irrespective of the fact that the sediment chemistry testing is outdated, I reviewed the results. Samples D1 to D4 are outside but adjacent to the area to be dredged. Samples D1 – D4 are considered to be heavily contaminated, with levels of PAH up to 250 times the lower action level. These samples also have marginal, but frequent, exceedances of the lower action levels for copper, zinc, cadmium, mercury, arsenic and nickel.

Although the sediment proposed for WID appears to be essentially clean, given its proximity to the area of contamination, I would be very reluctant to permit WID without inclusion of several mitigation conditions. Our experiences with WID in Cork Harbour demonstrated that the WID sediment was transported everywhere in the harbour, even when models and intuition indicated otherwise.

The proposed dumpsite is located in >90m of water, and at a minimum distance of 30NM (aerial distance) from its easternmost point to the westernmost point of the dredging area. A round journey of 60NM, at a rate of 6 kn will take at least 10 hours. With each barge holding just 1500 tonnes of dredged material, this would require a minimum of 166 journeys just for the solid dredged material. Using the Applicant's own worst case scenario of 66% of supernatant and 33% dredged sediment, this results in 500 journeys.

Figure 3 in Annex D of the application shows the proposed dumpsite superimposed on to a map of commercial fishing effort. Using this map, it seems to me that the original dumpsite proposed (approx. 10nm from the westernmost point of the dredging area) is in an area with very little fishing effort.

As only clean sediment is proposed to be dumped at the dumpsite, I'm a little puzzled as to why such an extreme measure is necessary (especially in times when we are urged to keep all GHG emissions to a minimum). Is such an environmentally extravagant measure justified? And if so, what of future dredging and dumping operations around the coast?