

## Grainne Power

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**From:** Licensing Staff  
**Subject:** Submission No 511 ISEFPO  
  
**Importance:** High

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**From:** isefpo [mailto:isefpo@eircom.net]  
**Sent:** 28 August 2015 11:43  
**To:** Grainne Power  
**Cc:** Wexford Receptionist  
**Subject:** Dublin Port Company Application for Dumping at Sea Permit  
**Importance:** High

Dear Ms. Power,

Please find attached the submission of the Irish South & East Fish Producer's Organisation Ltd. made on behalf of its members, in relation to the application by Dublin Port Company for a Dumping at Sea Permit.

I'd be grateful if you could confirm receipt and acceptance of our submission at your earliest convenience.

Yours sincerely,

Hugo Boyle,  
CEO,  
Irish South & East Fish Producer's Organisation Ltd.,  
18 The Mall,  
Waterford, X91 RDW7.

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Mr. Hugo Boyle,  
CEO,  
Irish South & East Fish Producers Organisation Ltd.,  
18 The Mall,  
Waterford.

Ms. Grainne Power,  
Programme Officer,  
Environmental Licencing Programme,  
Office of Climate, Licencing & Resource Use,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

Date: Friday August 28<sup>th</sup>, 2015.

**RE: Application for a Dumping at Sea Permit by Dublin Port Company**

Dear Ms Power,

I refer to the application for a Dumping at Sea Permit by Dublin Port Company (DPC) and hereby give notice in writing of our objection to the issuing of such a permit on behalf our members whose income depends on the area in question and its surroundings.

As a representative of fishermen and fishing vessel owners, we are acutely aware of the active commercial fisheries in the area subject to this application. The fisheries which are of most concern to us are those in which inshore vessels of less than 10 meters in length operate in and dependent upon. These vessels engage in traditional, sustainable, low impact fishing methods with their importance to coastal communities recognised and protected by the European Union. Due to their size, they do not have the luxury of travelling further afield to earn their living and as such will become economically unviable should their catches disappear as a result of this project.

Our first difficulty lies with the clear lack of consultation with and consideration for this local inshore community, the majority of who were only informed of the intended dredging and dumping at sea by word of mouth. Further to this, none of the fisheries representative groups, with the exception of Inshore Ireland, were invited to engage with DPC at any stage of the process. We therefore cannot see how DPC, without consulting with the fishing community



in the area, have established a clear understanding of the commercial fisheries which may potentially be impacted.

While we acknowledge that some analysis regarding commercial fisheries in the area has been completed, that analysis assumes these operations will only impact on bottom dwelling species. It is our view that trawling for such species by means of a 1.5 meters and 2 meters Beam Trawls over a 3 day period in May and June 2013 is far from adequate in determining the potential effect on all commercial fisheries in the area. As far as we can see no in depth analysis has been carried out on species such as Brown Crab, Lobster, Ray, Cod or Razor fish to name a few of the species which the inshore sector in the area depend upon.

Further to this, there appears to be a naive assumption that risk will be confined solely to the areas of Dublin Port, the shipping channel and disposal site. The Environmental Impact Statements fail to address fundamental questions regarding the wider effects of the operation such as; how will sediment transport; how will smaller harbours be effected by adverse silting and how will the recovery of juvenile fish such as Dab and Plaice which feed in the Dublin Bay area (as acknowledged in the limited analysis provided) be effected.

The dredging will, by DPC's own admission, "significantly reduce feeding in the dredged area for juvenile fish with full biomass recovery taking 2 to 3 years." Given the 6 year timeframe of this project, with dredging activates occurring for 6 months each year, the recovery period is likely to be pushed way beyond a timeframe of 2 to 3 years.

Of particular concern to us is the recovery of valuable Benthos species in the area, namely Whelks which will not occur until after the 6 year lifespan of the project. It is presumed that some recovery will occur during the 6 month non-dredge period but this recovery will be severally disrupted once dredging and disposal re-commences. Given that the slow growth and reproductive nature of Whelks, it is extremely likely the population will not recover in the area until many years after operations cease.

The Whelk fishery is worth €4 million to the Irish economy annually and accounts for up to 70% of the income of the inshore fleet in the area each year. The fishery is therefore extremely important to these vessels. Whelks are fished by the fleet to the North and South of the disposal site Burford Bank annually from October to March. As such the fishery is not "scaled back" during this period as incorrectly stated in DPC's analysis.

If the permit is granted, from October 2015 this fishery and the 6 month disposal period proposed by DPC at the Burford Bank site will coincide with each other, almost certainly eliminating the Whelk fishery over the next 6 years and far beyond as the population slowly



recovers. The economic effects on the vessels concerned is insurmountable and there will be no alternative sources of income.

In addition to the Whelk fishery the inshore fleet also pot for Crabs and Lobster to the East of Burford Bank and on the North and South approaches to Dublin Bay close to Howth and Dun Laoghaire. While the site has been an officially licenced dump site since 1996, the disposal of dredged material to this scale has never before been witnessed. We therefore believe it is impossible to predict, without further independent analysis exactly what impact the movement of debris will have on commercial fisheries in the area. Deeming the disposal material suitable for dumping at sea, does not eliminate the other consequential effects of such operations nor does it make it acceptable.

It is our view that this project will have significant implications for the inshore fleet in the area. As already stated, there are no other alternative streams of income open to these vessels. The potential effect this project may have on the coastal communities around Dublin is inconceivable.

Therefore, we must strongly object to the granting of such a permit unless further consultation, analysis and studies take place and we ask the EPA to proceed with caution when considering whether or not to grant this permit. The vested interests of all those who use the area, be it for pleasure or commercial means, must be safeguarded and we trust you will fully consider this when making your decision.

Yours sincerely,

Hugo Boyle.  
CEO,  
Irish South & East Fish Producers Organisation Ltd.