

**From:** Licensing Staff  
**Subject:** Submission No 535 Joe Gantly

**From:** Joe Gantly  
**Sent:** 28 August 2015 15:27  
**To:** Licensing Staff  
**Subject:** Dumping in Dublin Bay

## **Re: Dublin Port Company plans to dump silt on the Burford Bank**

I have heard the details of the plans by Dublin Port Company to remove up to 10 million tons of silt and sand from the mouth of the river Liffey and to dump that material on the Burford Bank in Dublin Bay.

My first concern is that Dublin Port Company cannot tell me how much of that silt and sand will be washed right back into the foreshores of the north bay area, particularly into the Blue Lagoon-Sutton Creek inlet, which is already silting up quite quickly. If the Creek is to fill with silt, a vitally important feeding-ground for tens of thousands of geese who winter there will have been wiped out. This is major a protected area, within a unique bio-sphere but the dumping plan will put an end to any value it has, now and forever

The Burford bank is located far too close to the shore and probably far too shallow for safe dumping of such an amount of silt and sand. When the materials dumped will inevitably return to the beaches around the bay, most especially Dollymount Strand, it is most likely that the beaches will lose their Blue Flag Status

I am unable to find details of any alternative dump site investigated by the surveyors working for the Dublin Port

Company and it seems likely that the Burford bank was chosen because it is not in a area where EU anti-pollution laws would apply, and is also because dumping there is the least expensive option.

Put simply, Dublin Port Company has not researched the impact that continuous dumping (24- 7 when weather allows) will have on what is a very tidal bay.

I believe- and someone such as the EPA needs to prove otherwise- that this entire plan is seriously and even lethally flawed, that the potential damage has not been properly assessed, that at all stages costs have been prioritised ahead of concern over public health. For example, when will we know exactly what toxic materials are contained in the material being dredged: when it washes back up when beaches lose their blue flags, when people who use the bay for recreation start getting sick?

If the EPA cannot protect us by insisting on a higher standard of research, analysis and transparency from the Dublin Port Company before this project is given the okay, it will be a major setback to everyone who values the unique heritage and environment of one of the most beautiful bays in the world.

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