

Noeleen Roche

From: Licensing Staff
Subject: Submission No 731 Siobhan Egan, Birdwatch Ireland
Attachments: DumpingAtSea 31082015.pdf

From:
Sent: 31 August 2015 09:52
To: Licensing Staff
Cc: Siobhan Egan; Oonagh Duggan; Case Work
Subject: Submission on DaS application

Please find attached a submission on Dumping at Sea application SOO24-01.

Many thanks
Siobhán Egan

Head of Policy, Communications & People Engagement
BirdWatch Ireland
segan@birdwatchireland.ie

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BirdWatchIreland
protecting birds and biodiversity

Unit 20 Block D
Bullford Business Campus
Kilcoole
Greystones
Co. Wicklow
Ireland

t: +353 1 281 9878
e: info@birdwatchireland.ie
w: birdwatchireland.ie

Patron
Michael D. Higgins
President of Ireland

Éarlámh
Micheál D. Ó hUiginn
Uachtarán na hÉireann

Dumping at Sea applications
Environmental Licensing Programme
Environmental Protection Agency
P.O. Box 3000, Johnstown Castle Estate
County Wexford
licensing@epa.ie

31st August 2015

Dumping at Sea Permit application (SOO24-01), the proposed disposal of the dredged sediments at the existing licensed offshore disposal site located at the entrance to Dublin Bay to the west of the Burford Bank

Dear Sir/Madam

BirdWatch Ireland has concerns regarding the disposal of material at the Burford Bank and the conclusions of the Natura Impact Statement on this issue. Special Protection Areas nearby have been identified based on their importance for seabirds and our concerns relate specifically to the impacts that this disposal may have on the role of the Burford Bank as nursery bed for seabird prey.

We note page 20/21 of Annex A of the Natura Impact Statement identifies that breeding species will not be present during disposal activities. However it does not identify **potential impacts on prey availability in the subsequent breeding season, or the potential longer term impacts of ongoing disposal activity at this location.**

The large breeding colony of Common Terns within Dublin Port has been monitored closely since 1995. Breeding productivity (number of fledged young per nesting pair) between 1995 and 2002 averaged 1.50 (range 1.20 to 1.79) (Merne 2004). In 2013 the estimated productivity for this colony was in the range 1.05 to 1.91 (median 1.48) (BirdWatch Ireland, unpublished data). This suggests that the overall productivity of the terns is relatively stable over the medium term and has not been negatively affected by dredging of the Liffey Channel in 2012. The breeding colonies in Dublin Port are principally occupied by terns from late April to August. From July to September, large flocks of migratory terns gather in Dublin Bay and roost on Sandymount Strand (Merne et al. 2008). By early October, the majority of these birds have left the bay completely. As the proposed dredging of the navigation channel will take place in winter months only (October to March inclusive), when the terns are absent, there will be no residual increase in suspended sediments from dredging by the time the terns return to the colonies in late April.

While foraging ability of breeding seabirds is identified in Section 4.4.2 of the NIS, the report does not address potential impacts on prey availability to breeding seabirds.

The disposal of dredged material in the approved disposal site will take place entirely in the winter months (October to March). The fine sediment elements of the dredged material are predicted to disperse in a plume on each tide. Turbidity at the approved disposal site will be elevated as dumping at this location is ongoing; however, suspended solids levels will return to background levels within a period of days, following the completion of dumping in March each year. For the remainder of each year the predicted concentrations of suspended sediment in the affected area will be low and would not have any significant effect on the foraging ability of seabirds in this area during the period when they are breeding within some of the nearby SPAs. There will thus be no residual effects on seabirds in the following breeding seasons. It is concluded that the



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Unit 20 Block D
Bullford Business Campus
Kilcoole
Greystones
Co.Wicklow
Ireland

t: +353 1 281 9878
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w: birdwatchireland.ie

Patron **Éarlamh**
Michael D. Higgins Micheál D.Ó hUiginn
President of Ireland Uachtarán na hÉireann

disposal of dredged material will have no significant impacts on birds in the approved disposal area itself or in the surrounding parts of the Irish Sea.

It is our view that an assessment of potential impacts on nursery beds for sandeel and other prey for seabird interests of the nearby Special Protection Areas needs to be considered as part of the screening Appropriate Assessment process and in advance of a decision in relation to this application.

Yours sincerely

Head of Policy, Communications & People Engagement

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