

Grainne Power

From: Licensing Staff
Subject: Submission No 751 Francis O' Donnell CEO IFPO
Attachments: DPC application to dump.doc

-----Original Message-----

From: IFPO FRANCIS
Sent: 31 August 2015 14:27
To: Grainne Power; Wexford Receptionist
Cc: 'IFPO JOHN'
Subject: Emailing: DPC application to dump

Dear sir madam,

Please find enclosed objection by IFPO to the application by Dublin port Co for a dumping at sea permit.

Kind regards,

Francis O' Donnell
CEO
IFPO

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Irish fish producers' organisation



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: Monday August 31st, 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 of our inshore members. I appreciate that we are one day late in making this submission but we were only advised of this application yesterday.

As a Producer Organisation representing fishermen and coastal communities we have significant issues with this application and its potential impacts on the inshore fisheries fleet in the area in question. Most of that fleet are small in size and will not have the potential to move to deeper water offshore.

In the first instance we believe that the four Irish and EU recognised fish producer organisations should have been consulted as stakeholders directly. This did not happen, as we were advised yesterday by phone by one of our members in relation to this application. We therefore cannot see how the DPC, could have any real understanding of the impacts of this application on the fishing community without having consulted with them.

We believe that the baseline analysis carried out to determine the impacts of the potential dumping of waste is inadequate. Fish species including crustaceans are highly migratory. A three day sampling programme by means of a 1.5 meters and 2 meters Beam Trawls in May and June of 2013 is not sufficient

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and deeply flawed in terms of robust scientific analysis. This sampling protocol is not suitable to determine the impacts of dumping on species such as Lobster, Brown Crab, Skates, Rays, Whiting, Haddock, Cod or Razor fish. Juvenile populations of all flat fish species will be impacted by such a dumping operation.

There will also be wider affects not confined to the dumping area itself in terms of sediment transport by ocean currents. This has not been addressed in the EIA. The whelk fishery will be adversely impacted north and south of the proposed dumping area by excess sediment in the water body. The 6 year timeframe of this project may render some species locally extinct as recovery will be almost impossible due to the dredging activates which will occur for 6 months each year throughout the proposed duration of the project. The whelk fishery and pot fishery in this area is critical to the local economy and a considerable compensation package will need to be put in place if proper remedial solutions are not put in place, and found to be working.

The scale of the proposed dumping of dredged material contained in this application will impact on the lobster and crab fisheries in this area. No proper evaluation has been afforded to understanding the impacts on food webs at various trophic levels within the local or wider ecosystem.

This licence if granted will have very significant biological and economical consequences. Little or no consideration has been given to this.

The IFPO strongly objects to the granting of this application and associated permit unless further stakeholder consultation is undertaken with the primary stakeholders who are inshore fishermen. More importantly a proper and in-depth scientific analysis is required to assess and understand the biological impacts of such a project on all commercial/non commercial fish species found in and around the proposed dumping site.

Yours sincerely,

Francis O' Donnell
CEO
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