

Grainne Power

From: Licensing Staff
Subject: Submission No 758 Pádraig Breatnach

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

From: Pádraig Breatnach
Sent: 31 August 2015 19:37
To: Licensing Staff
Subject: Dublin Port application to dump (S0024-01, 13/07/2015).

To: EPA

This is in connection with the proposal from Dublin Port for large-scale dredging in Dublin Port with dumping of the dredged material off Howth (S0024-01, 13/07/2015).

As a resident of Clontarf and a regular swimmer from the Bull Wall and as a constant user (with my family) of the Bull Island facility for walks I write to express serious concern about the impact of these proposals.

While accepting the need for dredging to facilitate access to Dublin Bay by shipping, there is expert scientific evidence that the dredging as proposed will inevitably cause short- to medium-term deterioration in water quality with associated hazards for swimmers, marine life, and birds. Measures must be taken against such a deleterious impact and accordingly EPA should insist on regular monitoring which should in turn feed into the rate at which the dredging work is done.

The site of the proposed dumping is a major cause for concern. In the past dumping in this region has resulted in extensive silting along the south side of the North Bull Wall, onto the Bull Island itself, and affecting the shoreline. Dumping should occur much further out than these proposals envisage, and careful analysis of currents and final destination of the silt needs to be undertaken to minimise effects on the amenity for humans, impact on birds, marine mammals and fish, and also shellfish and the porpoise population. The levels of heavy metals and other toxins in the dredged material requires diligent and continuous monitoring. Scientific opinion is available to show that we could here be talking of high levels of toxic waste.

The submission of DP as presented shows a cavalier dismissal of possible health and safety and environmental effects which has caused widespread concern in the local community and more widely. It ought to give rise to a red alert at the EPA. Along with all those others from the area who have expressed concern I wish to ask the EPA to examine the DP submission carefully and critically and to require and insist upon provision of comprehensive evidence and data to support the applicant's assertions and proposals.

Please note that this is not an expression of opposition to dredging per se, but is intended to urge the EPA to stand firm on standards of planning and research that will defend the environment we all share in the interests of this and future generations.

Yours sincerely,

Prof Pádraig Breatnach, MA Dr phil MRIA

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