

From: [Licensing Staff](#)
To: [Grainne Power](#); [Noeleen Roche](#)
Subject: FW: Dumping at Sea
Date: 21 March 2016 08:24:08
Attachments: [SOS Letter to EPA March 2016.docx](#)

From: SaveOurSeafront [REDACTED]
Sent: 21 March 2016 08:13
To: Licensing Staff
Subject: Dumping at Sea

To whom it may concern,

Please find attached letter regarding the application of Dublin Port Company for a Dumping at Sea permit (S0024-01) with respect to the Alexandra Basin Redevelopment Project.

Yours faithfully,

Sile Clancy,
Chairperson,
Save Our Seafront

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SAVE OUR SEAFRONT



21/03/2016

To whom it may concern,

Save our Seafront wish to object to Dublin Port Company's application for the "Dumping at Sea" Licence at Burford Bank (Ref. No. S0024-01).

Burford Bank was first given planning permission to be a "Dumping at Sea" site in 1996. However in December 2012 Minister Jimmy Deenihan (Minister for Arts Heritage and the Gaeltacht) designated the "Rockbill to Dalkey Island" site a Special Area of Conservation. This current application is the first for a "Dumping at Sea" permit at the Burford Bank since its inclusion within the SAC. Just last year in 2015 Dublin Bay, in its entirety, was given the designation of an UNESCO Biosphere. This is both an honour and a privilege for our city, but it also bestows on us a responsibility to look after this Biosphere and the animal and plant biodiversity that live therein. It is difficult for Save our Seafront to understand how an area currently designated as one of special conservation can any longer be considered an appropriate "Dumping" ground for any material, but most especially that which is already known to be contaminated with heavy metals such as Mercury. Common sense would dictate the opposite. DPC response to "Request for Further Information" and their "Revisions to Natura Impact Statement" might lead you to believe that because we can measure something it automatically correlates that it can be managed with the same level of precision. Everybody knows that we can measure how many car crashes happen and put in mitigating measures to help stop this,

but still people die every day. So too it would follow with Dublin Bay. DPC could put in CAD cells as mitigating measures. This might help control the dispersal of “Dumped” material, especially that of a contaminated nature, and subsequent distribution around the Bay, but its efficacy cannot be guaranteed. The last permitted “Dumping” at this site in 2012 showed 85% of the material had dispersed by the following year. Wind and tide can cause chaotic processes that cannot be fully predicted. Nature is just too great a force to control fully. Dumping at such an industrial scale as proposed is bound to contribute to elevated levels of turbidity and heavy metal pollution in the receiving waters. These heavy metals are cumulative toxins and as such ongoing exposure to them will have a cumulative effect on the protected flora and fauna of these waters. DPC constantly play down any potential negative effects in their reports by using words such as “should” or “may” or “not likely”. Dumping at this site should not be happening at all and just playing down the effects of the dumping does not make it acceptable. One would have to question if a proposal for a “Dumping at Sea” site licence application was made today for this area would it get it? Our belief is that it would not, and hence dumping at this site should cease. Without absolute scientific certainty that there would be no negative impacts on the receiving environment this application for a DaS permit should be refused.

Biodiversity is crucial for the well-being of all life on earth. Habitat destruction is currently a major cause for Biodiversity loss. Even a small element of break down can affect the balance of our whole eco system. We urgently need to proactively protect the habitat and species that we currently have, and this “Dumping at Sea” application will not do this.

The Harbour Porpoise SAC Survey carried out in 2013 by Simon Berrow and Joanne O’Brien resulted in a total of 201 sightings comprising at least 292 individual harbour porpoise over a six day survey

period visible in the Harbour area. For those of us who walk along the cliff walk from Sutton to Howth harbour porpoise can regularly be observed either singularly or in pods. Harbour Porpoise are a protected species under Annex 11 of the EU Habitats Directive. They are present in this area all year round feeding, breeding and hauling out. They rely on sound production through the use of echolocation signals for foraging orientation and communication and as such would be very vulnerable to the disturbance and further loss of habitat by “Dumping at Sea” at Burford Bank. Their breeding season and presence of growing pups is October to March which is the very time that Dublin Port propose to dump at this site repetitively 24 hours/day, 7 days/week, 6month/year, over a six year period. Once again it would seem to fly in the face of the SAC designation to have this species and habitat interfered with in such a manner.



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Map showing the locations of harbour porpoise sightings and corresponding group sizes recorded during survey of Rockabill to Dalkey Island SAC in 2013.

North Bull Island Lagoon also lies within the parameters of our UNESCO Biosphere and is just a few miles away from Burford Bank. This site has the most designations of any in the Republic of Ireland. It is of EU importance and part of the Natura 2000 Network as both a Special Protection Area under the EU Birds Directive and a Special area of Conservation under the EU Habitats Directive. Each Winter Dublin Bay is home to over 30,000 migratory birds from late September right through to late April. The numbers of Light bellied Brent Geese and Godwit, in particular, are of international importance. Dubliners are amazingly lucky to have such an asset on their doorstep, and it seems extraordinary to put this very special area under any possible threat. Words such as Protection and Conservation have a meaning and value. "Dumping at Sea" with contaminated material just miles away from such protected areas would seem to fly in the face of the many designations Dublin Bay holds (Rockabill to Dalkey – SAC - EU code 003000; Lambay Island – SAC - EU code 000204; North Dublin Bay – SAC - EU code 000206; South Dublin Bay – SAC - EU code 000210; North Bull Island – SPA - EU code 004006; South Dublin Bay & Tolka – SPA - EU code 004024). The contamination of the food source of some of these birds and the threat of movement of material or leeching of contaminants will have cumulative effects over time. It would be far more than a shame to lose our UNESCO Biosphere designation or indeed North Bull Island lagoon. Consequent silting up of the Lagoon as a result of movement of large amounts of material to Burford Bank could eventually be the resultant outcome. Decision making by a body such as the Environmental Protection Agency is of paramount importance. Please let us hope it is not a poor one.

We do not agree that the "ABR project will not result in direct, indirect or cumulative impacts which would have the potential to adversely affect the qualifying interests/special conservation interests of the Natura 2000 sites within the study". A short-sighted granting of this permit for "Dumping at Sea" at Burford Bank will in our opinion have long-term consequences. This is an unsuitable site to

be dumping anything at, and it should no longer be deemed acceptable to dump any material, most especially “contaminated material”, in this Special area of Conservation.

Yours faithfully,

Sile Clancy,

Chairperson,

Save our Seafront

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