

Submission No 768

**From:** [Licensing Staff](#)  
**To:** [Grainne Power](#)  
**Subject:** FW: Dublin Port Company for a Dumping at Sea permit (S0024-01)  
**Date:** 21 March 2016 11:53:26  
**Attachments:** [S0024-01 Observation.pdf](#)

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**From:** John Cronin [REDACTED]  
**Sent:** 21 March 2016 11:48  
**To:** Licensing Staff  
**Subject:** Dublin Port Company for a Dumping at Sea permit (S0024-01)

To whom it may concern,

Please find my 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 Sincerely,  
John Cronin

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Licensing Staff  
Office of Climate, Licensing & Resource Use  
Environmental Protection Agency  
PO Box 3000  
Johnston Castle Estate  
Co. Wexford  
Ireland  
17/Mar/2016

**Re: Dumping at Sea Permit Application for ABR Project by Dublin Port Company - S0024-01**

I wish to express my deep concern regarding the application by DPC for dumping at sea of millions of cubic metres of material at the Burford Bank site.

There are a number of proposed DaS activities looking to use the Burford Bank over an extended period (6+ years).

The DPC application suggests that millions of cubic meters of material, a significant portion of it contaminated with heavy metals such as mercury and nickel can be placed into containment (CAD) cells without significant pluming, drift, or dispersal of contaminated fine silts into the surrounding SAC designated ecosphere. The CAD containment assessment assumes no significant mechanical disruption to the integrity of the bunds or their sand/gravel caps. This integrity cannot be guaranteed, especially if Burford Bank location continues to be treated as a dumping ground on an industrial scale. The revised Natura Assessment when considering in-combination effects due to dredging works proposed at Howth Marina, Dún Laoghaire Cruise Terminal, and maintenance dredging by DPC, does not appear to take into consideration the potential disruption to the integrity of the ARB CAD cells by the dumping of hundreds of thousands of tonnes of material at the same location.

I note in the Natura Impact Assessment and in the associated documents a tone that there is an existing licensed dump site at the Burford bank (established in 1996) that can continue to be used provided the potential impacts can be scientifically played-down, couching potential impacts in statements such as "should recover".

The Burford Site now sits fully within the Rockabill to Dalkey SAC (EU code 003000) and its ongoing use as a dump site for millions of cubic metres of dredge material is entirely incompatible with the requirements of Article 6(2) and would be considered illegal under European Law.

I note that no alternative dump sites were considered in the ABR application.

The existing DaS license for the Burford site should surely now be revoked and a suitable location outside of the curtilage of the following SAC areas: 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 should be identified and licensed and any DaS capital or maintenance works applications (including the ARB related material) diverted to this appropriate site.

The proposed ABR dumping of dredge waste has the potential to cause unwarranted impact on species such as the harbour porpoise which are known to gestate within the area. Heavy metals such as mercury pose a cumulative toxicity hazard to all living organisms. Every exposure is added to the previous within the organism and enters the marine food chain over time. Dispersal of fine silts over a number of years as proposed will expose the fauna to repeat exposure events. It is not possible to remove doubt regarding the leaching of contaminants into either the environment or the downstream impacts of dumping on this scale within the Rockabill to Dalkey SAC.

Dublin Bay is now a UNESCO biosphere reserve site and also a Natura 2000 site containing a number of designated SAC and SPA - it is not appropriate that the Burford Bank be used as a location for ongoing industrial dumping activities.

I encourage the EPA to perform a thorough review of the DPC application with a view to challenging its legal validity and the potential impact on the SPC/SPA of the proposed operations.

Mise le Meas,

John Cronin

[REDACTED]

[REDACTED]

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