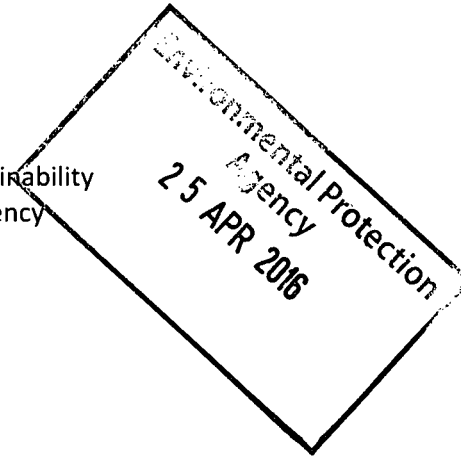




Department of
**Agriculture,
Food and the Marine**
An Roinn
**Talmhaíochta,
Bia agus Mara**

Grainne Power
Programme Officer
Office of Environmental Sustainability
Environmental Protection Agency
Headquarters, PO Box 3000
Johnstown Castle Estate
Co Wexford



Your Ref: S0005-02

Our Ref: -- FW 8/57

Re: Dumping at Sea Permit application on behalf of the Department of Defence in respect of Maintenance Dredging at the Hawlbowl Naval Base, Cork Harbour.

Dear Grainne,

Further to your letter dated 28th January 2016, please find below observations from this Department.

There are no licenced aquaculture sites in the vicinity of the proposed dump site and therefore the it is considered that no aquaculture operation would d be impacted by the proposed dumping activity.

The applicant has submitted the results of chemical analysis of samples of the material to be dredged that were collected on 16th April 2015 at a total of 7 locations in the proposed dredge area. The sampling location and results of the analysis are given in Appendix A of the document entitled "Impact on the receiving environment Appropriate Assessment submitted as Attachment A.1 to the Application Form. The results show concentrations of Zinc above the Irish Upper Levels at location NV4 and NV6 as well levels of Lindane and HCBs above the Irish Upper Levels at locations NV3, NV4, NV5 and NV7. These results indicate heavily contaminated material which may not be suitable for "unconfined" disposal at sea as is proposed. The area with elevated concentrations, particularly at NV3 and NV4, appears to be similar to the area where heavily contaminated material was recorded in 2010 prior to the dredging campaign in February 2011. In this instance an exclusion zone, within which the loading and subsequent dumping of dredged material was prohibited, was applied as a Condition of the Dumping at Sea Permit issued by the EPA.

A similar exclusion zone may be appropriate in this case. While the disposal of dredge spoil at sea is a matter for consideration, and final determination, by the EPA the comments from the applicant on potential alternative management arrangements for dealing with the heavily contaminated material, which could include an exclusion zone, should be sought.

Yours sincerely,

Deirdre O'Flynn
Aquaculture & Foreshore Management Division
Department of Agriculture, Food & the Marine
National Seafood Centre

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