

Noeleen Roche

Subject: FW: S0028-01 - Capital dredging of Smooth Point at Killybegs Harbour

From: william britton [mailto: [redacted]]
Sent: 09 January 2017 21:51
To: Licensing Staff
Cc: Richie Flynn
Subject: S0028-01 - Capital dredging of Smooth Point at Killybegs Harbour

Dear Sir/Madam,

We are writing to express our concerns over the proposal to dump dredged material from the expansion of Killybegs harbour off the Donegal coast. Our concerns are as follows:

1. The potentially toxic nature of the material and the consequent risk to shellfish.

There is a clear risk that the toxins in the first layer of material (to be disposed of in a land-based site) have leached into the second layer which is to be disposed of at a site within Donegal Bay. There is a clear danger that the material will drift and spread, resulting in contaminants harming the health of shellfish farmed in Donegal bay, as well as other ocean life. In addition to the environmental damage that might be caused, this could also have impacts on our business and on local jobs.

2. It has been suggested that previous fish kills in 2003 have been associated with disposal in Site A, which is currently proposed as the dump site. An investigation into whether the fish kill had been caused by the disposal of materials at sea was inconclusive.

3. The site proposed for disposal (Site A) is close to Natura 2000 sites.

We would advocate that should the disposal proceed, that the neither Site A or B should be considered or used. Regarding **Site C** (or other possible sites further west of this), new modeling is required to ensure that any material dumped will be washed westwards into the Atlantic. We also concur with the IFA view that it is very important that *monitoring of the operations at the dredge site, on board ship and at the dump site are carried out independently to ensure no toxic material is carried out into the bay and that all dumping occurs exactly where it can do no harm.*

Yours Sincerely,

Willie Britton,

Director of Raco Shellfish

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