

Sub no. 6

Noeleen Roche

Subject: FW: Dumping At Sea licence application Killybegs (S0028-01)
Attachments: Donegal dredge spoil IFA submission.pdf

From: Richie Flynn [mailto:richieflynn@ifa.ie]
Sent: 11 January 2017 16:09
To: Licensing Staff
Subject: Dumping At Sea licence application Killybegs (S0028-01)

To whom it concerns,

Please see attached our submission in relation to the proposal to dump spoil from harbour dredging works in Killybegs harbour, Co Donegal as applied for by the Department of Agriculture Marine and Food and advertised in the Donegal Democrat newspaper of December 15, 2016.

I would be grateful if you would confirm receipt of same.

Sincerely,

Richie Flynn
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Office of Environmental Sustainability,
PO Box 3000,
Johnstown Castle Estate,
Co Wexford

Email licensing@epa.ie

RE: Application by Dept. of Agriculture, Marine and Food to dump spoils from dredging arising from proposed Pier Extension at Smooth Point, Killybegs, County Donegal. (S0028-01)

Dear Sir/madam,

In relation to the above application which was advertised in The Donegal Democrat of December 15th, 2016, IFA Aquaculture wishes to make the following submission.

The aquaculture industry in the locality (Donegal and Sligo Bay areas), comprises sales and standing stock worth up to €50 million and the industry supports 150 jobs at peak production periods. IFA represents this industry and as such we have been in close consultation with our members regarding this application.

The clear consensus among all fish and shellfish farmers in the area is that, despite the fact that we support coastal development and the development of Killybegs harbour in particular, the major concern is the fate of the spoil from the dredging activity.

The industry is very concerned that the proposed location for the dumping of dredge spoil should be at "Location A" as indicated in the application documents. This site is highly controversial and viewed with deep suspicion and fear by our sector, with a huge amount of justification. The site was associated with a major fish kill in 2003 and, despite a detailed and costly report by the Marine Institute into the mortality, the dredge spoil dumped there could not be ruled out as a factor in causing "gill damage" to millions of salmon. The time lag between the incident and the report meant that no direct evidence was found by the report's authors, however our members' who suffered massive losses as a result, have clear personal and independently verified facts in relation to the layers of unusual material which appeared on their nets and cages prior to the mortality event.

The losses were to the value of tens of millions of Euro, and there is no tolerance for any risk arising from the process of dumping at sea of any material which could lead to the irritation of the gills of finfish or smother oysters or mussels. It is irresponsible and unacceptable for the Department's consultants to dismiss the possibility of the spoil at the dumping site having been a factor to this disastrous situation.

IFA Aquaculture requires that a precautionary approach must be taken in relation to dumping at sea in such close proximity to aquaculture operations and site "A" must be ruled out as an excessively risk-laden site.

IFA Aquaculture is also concerned that the environmental information submitted with the proposal is less than satisfactory – a fact which we are well aware of because of the extremely onerous demands made of our members when submitting applications to grow fish or shellfish in the marine environment.

At the very least there should be made available to the sector digital dispersal studies from an independent company covering all three sites originally proposed by the Department during its scoping process in March 2016. These type of studies are a standard requirement of any finfish aquaculture application. It has been noted by the experts in our sector that it is too simplistic to note that the prevailing currents are Northerly as this does not take account of tidal streams and surface currents and disturbance caused by wind.

A very clear benthic survey must be submitted to identify the ecology and species that would be affected by the proposed dumping.

The "cumulative effect" and "adjacent impact" of the dumping on the four SACs/SPAs in Donegal Bay must be carried out and published. This would be standard practice for any applicant to the Coastal Zone Administration Division of the Department of Agriculture, Marine and Food itself. <http://www.agriculture.gov.ie/seafood/aquacultureforeshoremanagement/aquaculturelicensing/>

IFA Aquaculture notes the categorisation of the spoils but we are unclear as to how these different categories of toxic and "non-toxic" materials can be separated out with any confidence as work begins on dredging the area. In a marine situation the likelihood of mixing and cross contamination is extremely high – no matter what method (Suction etc.) is used. This needs further clarification and assurance that now Class 2 or 3 material is ever removed and dumped at sea.

IFA is further concerned at the supposition in the proposal that despite the clearly identified peaty nature of the layers of material at Smooth Point, it is assumed that this light and relatively buoyant matter would go straight to the bottom of the sea when in fact it will naturally disperse in the water column and lie suspended in the top layers of the ocean, precisely where our members stocks are located.

IFA Aquaculture is puzzled as to why the research into the *karenia mykimotoi* blooms which occurred off the northwest coast and were identified up to 30 miles offshore by the Marine Institute's Celtic Explorer is not discussed or mentioned in the application. This bloom moved rapidly – by tide, current and wind – into the innermost parts of Donegal Bay, causing massive damage to oyster producers and to inshore dwelling wild fish and shellfish. This further strengthens the industry's belief that Donegal Bay is not the passive or safe place to dump spoils as presented in the application but a very active and swift moving system which has the ability to transport suspended material right along the northern and eastern shores in a very short timeframe. Research on the bloom is available here:

<https://www.researchgate.net/publication/294871528> Potential impact of an exceptional bloom of *Karenia mikimotoi* on dissolved oxygen levels in waters off western Ireland

See also:

<http://www.marine.ie/Home/site-area/news-events/press-releases/exceptional-algal-bloom-detected-north-west>

IFA Aquaculture has concerns over the paucity of the monitoring proposed for the operation. The dumping process must be overseen by an independent environmental expert to ensure regular monitoring of the contaminants and that any spoils are dumped where they are supposed to be dumped which will require a presence on the vessel carrying out the work itself.

In conclusion, IFA Aquaculture believes that the development of Killybegs harbour should proceed. However any decision to simply go for the lowest cost option would have serious impacts upon our members. There is no plan outlined for dealing with the consequences of another fish kill nor any mention of proposed compensation or protection for the fish and shellfish farmers in the region should our fears be realised. We require a much more structured approach which gives full appreciation of our concerns. **Our first requirement is that all spoils should be used on land** and it is our view that the use of the Category 2 & 3 material in land reclamation has not been sufficiently explored.

If any spoils which have been *independently guaranteed* to be free of toxic substances are to be dumped anywhere at sea, this should only be done at a much greater distance from any aquaculture operation than Site A and accompanied by clear compensatory measures in the event of a negative impact and also a detailed computer generated dispersion model which must be made available to industry in advance.

Should you have any queries, please feel free to contact us using the details above.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'R. Flynn', with a long horizontal line extending to the right.

Richie Flynn
Executive

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