

Noeleen Roche

Subject: FW: Killybegs pier extension 2017 final
Attachments: Killybegs pier extension 2017 final.docx

From: O'Brien, Grainne [<mailto:devine@bim.ie>]
Sent: 12 January 2017 15:13
To: Licensing Staff
Subject: Killybegs pier extension 2017 final

To whom it concerns,

Please find attached a submission from BIM regarding the proposed Killybegs Pier extension.

Kind Regards
Grainne Devine

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Bord Iascaigh Mhara
Irish Sea Fisheries Board

Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 300
Johnstown Castle Estate
Co Wexford

12th January 2017

To Whom it Concerns

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)

I refer to the consultation published in the Donegal Democrat on 15th December 2016 regarding the above proposed application. BIM, the Irish Seafood Development Agency welcomes the opportunity to respond to this proposal and would like you to consider the following comments, reflecting the interests of the aquaculture and fisheries sectors in the vicinity.

- 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.
- The proposed infrastructural development will provide additional facilities for the seafood sector and is welcomed.
- Donegal Bay hosts a vibrant aquaculture industry. Salmon, oysters and mussels are all cultured in the bay as illustrated on the map of licenced areas attached. Seafood Safety is at the forefront of business management practices and Environmental Management is taken very seriously by the growers some of whom retain Organic and Origin Green certification demonstrating their commitment to best practice and continual improvement of Environmental performance.
- The proposal to dump dredge spoil associated with construction of the Pier extension is of grave concern due to the potential impacts on marine life including aquaculture stocks from re-suspended material re-entering Donegal Bay. The proposed disposal sites coincide with fishing ground utilised by pot fishermen

National Fishery Training Centre, Greencastle, Co. Donegal

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and will directly disrupt these activities. We understand that the North Regional Fishery Forum will make its own detailed submission regarding wild fisheries concerns.

- BIM are strongly opposed to any Class 2 material being disposed at sea. The report on Alternatives to Disposal of Dredge Material at Sea is somewhat ambiguous regarding this material indicating that it is unsuitable for disposal at sea and will be disposed to landfill (sections 4.8.2 & 4.8.5) and later stating that it Class 1 and Class 2 materials will be disposed at sea (section 7.6.1) While the material has been graded according to chemical risk and that which poses a higher risk will not be disposed at sea the volume of Class 1 which could be disposed at sea is also a concern.
- Class 1 silt grade dredge spoil could have serious negative effects of washed back into Donegal Bay. Historically it cannot be ruled out that similar dumping of dredge spoil at a location very close to that proposed in this instance (Site A), was the cause of large mortalities of aquaculture stocks within Donegal Bay in 2003.
- The preferred option for the location of the disposal site (Site A) is that which is closest to Killybegs and in our opinion poses the greatest threat to the aquaculture and fishing sectors in the area.
- As a certain amount of disposal at sea is likely to occur as the preferred option, BIM requests that a detailed monitoring programme for the testing of dredge material prior to as well as during disposal and the subsequent impact of this disposal be included within the proposal to protect the interests of the seafood sector working in the area. Monitoring should also be carried out of fishing grounds and aquaculture site prior to and during disposal.

Yours Sincerely

Grainne Devine
Environmental Officer

National Fishery Training Centre, Greencastle, Co. Donegal

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