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From: Richie Flynn <richieflynn@ifa.ie>
Sent: 28 April 2017 11:04
To: Licensing Staff
Cc: wildatlanticshellfish@gmail.com; Thomas Ryan; Bryan Barry; Adrian Leddy
Subject: Sligo harbour dredging
Attachments: Sligo Bay dredging submission April 2017.pdf

Environmental Protection Agency Licensing Programme
Office of Climate Licensing and Resource Use
Environmental protection Agency
P.O. Box 3000
Johnstown Castle Estate
Co Wexford
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Please see attached a submission on behalf of the shellfish aquaculture sector in relation to proposed dredging works at Sligo harbour as notified by advertisement in The Sligo Champion of March 28th last.

Please do not hesitate to contact me if you have any queries.

Yours Sincerely,

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IFA Aquaculture

Home of The Irish Salmon Growers' Association,
The Irish Shellfish Association

Irish Representative:

Federation of European Aquaculture Producers;
European Mollusc Producers' Association;
International Salmon Farmers' Association.

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Re: Sligo Harbour: Application by Sligo County Council for dumping of spoil at Sea from capital and maintenance dredging of Sligo Harbour commencing July 2017 as advertised in The Sligo Champion newspaper, 28 March 2017.

To whom it concerns,

IFA Aquaculture is the representative organisation for all aquaculture producers in Ireland, including molluscan shellfish and finfish both in the marine and freshwater sectors.

Our membership includes producers of oysters and clams in the Sligo Bay region as well as finfish producers (salmon) along the south Donegal coast.

We write to you to relay the views and concerns of the industry in the area in relation to the aforementioned dredging project.

1. IFA is concerned that the information on the aquaculture sector (Appendix F. 1 (vi)) outlined in the project proposal is neither current nor accurate.

- Pacific oyster production is now the main production sector in the area from Sligo harbour to inner Donegal Bay, Manila Clam production has reduced to practically zero;
- According to the latest statistics produced by an Bord Iascaigh Mhara (BIM) for 2016, there were 170 tonnes of oysters produced in County Sligo in 2016 with a value of €860,800, providing employment for 35 people¹.
- Oysters in the region are considered of exceptionally high quality and have generated significant interest and demand from the far eastern market²

2. Our oyster farming members have general concerns regarding the dredging of any materials in the vicinity of their farms – notwithstanding the prevailing currents – and the potential for any toxic material such as heavy metals or anti-foulant paint which was used in the past n fishing and transport vessels to potentially enter the food chain. They also have legitimate concerns regarding

¹ <http://www.bim.ie/media/bim/content/publications/aquaculture/BIM-Annual-Aquaculture-Survey-2017.pdf>

² F. O'Luasa, seafood marketing unit, Bord Bia, pers comm., April 2017

any increase in suspended solids/silt which may cause stress to oysters in particular and increase the chances of vulnerability to diseases such as Vibrio and Oyster Herpes Virus. These issues, and the general good image and reputation of the Sligo oyster, is at the forefront of their minds when viewing this application.

3. In particular, due to the increased risk of suspended solids and the undefined area of settlement as well as the greater risk of spreading contaminants, our members in the area wish to express their unequivocal objection to water injection dredging at the Sligo harbour site. This type of activity represents far too much of a threat to the sector than is deemed necessary to balance any negligible increase in access to the harbour which would result.

4. In other sensitive areas such as Castletownbere and Dingle where capital and maintenance dredging was carried out, the dredge spoil was carried to landfill and this would always be the preferred option for aquaculture producers in the vicinity of such works, particularly near a working harbour area which would have seen a lot of marine traffic in the past. Contaminants from land-based activities near the harbour, such as car washing etc could also have deposited material in the area which would be disturbed by the dredging activity and cause potential problems for oyster stocks.

5. Where such risks exist, it is important that adequate monitoring of the health of the stocks during and for a reasonable period after the dredging takes place is carried out by qualified experts in molluscan fish health and food safety, paid for by the contractors to the dredge activity and the results made known to local growers immediately upon availability in the interest of the industry and public health. A commitment to this monitoring from Sligo County Council is a key demand of the Sligo area shellfish industry.

6. Given the distance from the harbour to the proposed dump site, the industry also believes that it is important to have an independent observer on board the transport vessel to ensure that all dredged material arrives at the intended site and is not deposited en-route either by accident or on purpose to save costs.

7. The industry is concerned that the supporting documents to the proposed application – and in particular Appendix F.1(vi) do not appear to be particularly well informed on either the production situation in the area nor the underlying legislation regarding the regulation of aquaculture. The figures and production profile need to be updated in accordance with point 1 of this submission. In addition in Part 6.3.3 of the relevant appendix, mention should be made of the 1997 Fisheries (Amendment) Act and its supporting Statutory Instruments which superseded the 1980 Fisheries Act as the main legal structure for dealing with aquaculture applications and operation throughout the country. The 1997 legislation overrides the previous concept of "designation" in favour of individual area licensing.

8. In summary:

- All dredging activity in the vicinity of shellfish production poses risks to the producer and his/her stocks;
- All reasonable mitigation measures must be explored, including the dumping of dredge spoil at sea, in the context of the long term sustainability of the industry and its potential to provide both export income and employment to the area for generations to come;
- Where dumping at sea is considered, monitoring systems for the health of shellfish stocks during the activity must be undertaken by the contractors;

- Finally, a compensatory scheme for loss of stocks, markets, reputation and any other damage suffered as a result of dredging activity adversely impacting n shellfish stocks must be put in place and agreed with industry before such activity takes place.

Yours Sincerely

Richie Flynn
IFA Aquaculture & Irish Shellfish Association

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