

Noeleen Roche

From: OFlynn, Deirdre <Deirdre.OFlynn@agriculture.gov.ie>
Sent: 12 April 2018 12:45
To: Noeleen Roche
Cc: Foreshore
Subject: Dumping at Sea Permit Kilmore Quay Harbour

Noeleen Roche
Programme Officer
Office of Environmental Sustainability
Environmental Protection Agency
Headquarters, PO Box 3000
Johnstown Castle Estate
Co. Wexford

12th April 2018

Your Ref: S0030-01

Our Ref: FW/6/15

Re: **Foreshore Application for Dumping at Sea Permit on behalf of Wexford County Council in respect of Kilmore Quay Harbour, Co Wexford.**

Dear Noeleen,

Further to your letter dated 31st January 2018, please find below observations from this Department.

The need to dredge the entrance channel to Kilmore Quay Harbour is welcomed in order to maintain a safe working depth for fishing and other boats using the harbour.

Concern has been expressed however by local lobster and crab fishermen as to the location of the proposed dump side for the dredge spoil. The area is known by inshore pot fishermen, as an area that is suitable habitat for juvenile lobsters. This type of seabed is clearly confirmed by the site description contained within the documentation supplied, including photographs of the seabed, where the area is classified to include cobble stone and gravel. This type of seabed is ideal for juvenile lobsters, where the lobster fishery is one of the most important fisheries in the area for local pot fishermen.

There are other areas close to the proposed dumpsite that are considered more suitable (i.e. sand only), and the South East Regional Inshore Fisheries Forum is happy to facilitate discussion with local fishermen on the best location. One such proposed alternative location contains the following co-ordinates;

SE corner	52° 08' 30" N	6° 30' 50" W
NE corner	52° 08' 70" N	6° 30' 50" W
SW corner	52° 08' 30" N	6° 31' 00" W
NW corner	52° 08' 70" N	6° 31' 00" W

The disposal site is deemed to be too close to the mouth of Bannow Bay and could cause sedimentation of the mouth of the bay and reduce flushing of the bay. Bannow Bay is a sheltered bay with weak flushing on certain tides and thus is prone to sedimentation accrual at the mouth

of the bay. It is an important bay for oyster farming where around 500 tons of top class oysters are produced annually valued in excess of 2.5 million euros. This industry is important to the local economy and will hopefully play an important role for county Wexford in the coming years in terms of seafood festivals for the region. Narrowing of the mouth of the bay would cause increased sedimentation within the bay and potentially reduce water quality especially in terms of algal blooms all of which would negatively impact the oyster industry there.

It is believed that the 40,000 tonnes of dredge spoil will be brought towards the mouth of the bay during spring flood tides and even during winter storms. It is noted that the Tidal Model outputs in Appendix 3 are only shown for the immediate area around Kilmore Quay (not the dumping area) and also only for the period immediately before and after low water and high water. Mid flood and mid ebb scenarios should also have been investigated as normally this is when the strongest currents are reached. In addition, there are no model outputs for the disposal site shown in the document at all despite saying earlier in that the document that they are in Appendix 3.

On the issue of testing for heavy metals and other pollutants, a small number of test samples will never rule out this risk especially to oysters which accumulate through filtration.

The dumping site seems very close to shore and no tidal modelling has been carried out at the dumping site – only at the extraction site. There are extensive oyster beds in the vicinity – 3 objections by local oyster growers. They are planning on dumping in relatively shallow water ~ 23 m.

Historically there have been issues in Ireland with the dumping of dredged material i.e.

- 1) Dredged material not reaching the designated dumping spot either due to bad weather or operator error.
- (2) The dumping area not being suitable.

Thus given the above it is observed that it would be better for the dredge spoil to be dumped somewhere east of the Saltees and not in the vicinity of Bannow Bay.

I will also forward this response by post as I am unsure if I have the correct email address for you.

Yours sincerely,

Deirdre

Deirdre O'Flynn

EO, Aquaculture and Foreshore Management Division

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

National Seafood Centre, Clogheen, Clonakilty, Co. Cork, P845 TX47

An Lárionad Bia Mara Náisiúnta, An Cloichín, Cloich na Coillte, Corcaigh, P85 TX47

T +353 (0)23 8859529

www.agriculture.gov.ie

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