

Grainne Power

From: Kelleher Evan <Evan.Kelleher@agriculture.gov.ie>
Sent: 10 May 2018 12:31
To: Grainne Power
Cc: Foreshore
Subject: DAS Permit Bunrana Pier S0011-03
Attachments: oyster Farm Location.jpg

Grainne Power
Environmental Licensing Programme
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Co. Wexford

Your Ref: S0011-03

Our Ref: FW/15/14

Re: Dumping at Sea Permit on behalf of Donegal County Council in relation to Bunrana Pier, Bunrana, Co. Donegal.

Dear Grainne,

Further to your letter dated 21st March 2018 the department has the following observations to make on the above mentioned planning application:

- The dumping area is 3km from an oyster farm (map attached above) which is licensed and which is in the designated shellfish area, T12/462A. The Department would request that the developers are made aware of the oyster farm and that the plume from the spoil should not impact on the oyster farm.
- The 2016 modelling report submitted in support of this application seems to point to a depositional impact of 100mm for 8000 tonnes per day dredging rate over 13 days. The Department would query the accuracy of this conclusion which is partly based on a conversion factor of approximately 2.6 tonnes per cubic metre to convert dredge quantity from cubic metres to tonnes – see table I of report ref 18670-6004-A Modelling Assessment Report. EPA might check the accuracy of this bulk density conversion factor with the applicant. While possibly a specific gravity value 2.6 appears to be too high a bulk density for granular sediment. If a lower bulk density value should have been applied the volume of sediment discharged in the model corresponding to 8000 tonnes per day would accordingly be higher and modelled depositional amounts for 8000 tonnes per day would also be higher than those shown on Figure 10 of that report.

More than 10 years ago there was an expectation that plough dredging maintenance at this location might be phased out in favour of methods that created less suspension of dredged material into the water column. The licensing authority may have a position on long term suitability of plough dredging as an appropriate dredging technique at this location or elsewhere – it would be important in context of this 8 year application – which if granted presumably will be followed by further such applications into the future.

In general the proposal to dredge 8000 tonnes per annum seems acceptable to the Department subject to confirmation on the bulk density used in supporting study - but long term environmental sustainability of dredging along the pier at Bunrana and suitability of the dredging technique employed might be given some

further consideration by the licensing authority on this occasion – in the context of permits issued for maintenance dredging works at Bunrana pier over the past 2 decades.

- The bay is currently classified as a “B” class area.

There is a Pacific Oyster farm approximately 2 kilometres north of the proposed dredging and dumping site, Marine Harvest Ireland have a fish farm approximately 3 kilometres across the bay from the proposed dredging and dumping site, there are several dredging vessels operating in Lough Swilly harvesting Wild Native Oysters (*Ostrea eduli*) and Wild Pacific Oysters (*Crassostrea gigas*).

The silt and debris turned up by the dredging of the pier and subsequent deposition of debris may have negative physical impact on the commercial fisheries in the area and consultation with these commercial interests. The high levels of heavy metals and other contaminants in the proposed dredge material may be absorbed by the shellfish by virtue of the shellfish being filter feeders, this may result in elevated levels of contaminants in the shellfish meat if the shellfish are tested during official controls, leading to a recall etc.

The current classifications of Lough Swilly is “B” for Pacific Oysters and Native Oysters, which means the Oysters will have to undergo relaying for an extended period of time in an “A” class bay or depuration of specific heat treatment method before being placed on the market for direct human consumption. Additional testing of the shellfish would be advisable before the shellfish would leave Lough Swilly.

Yours Sincerely,
Evan Kelleher

Evan Kelleher
EO, Aquaculture and Foreshore Management Division

An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine

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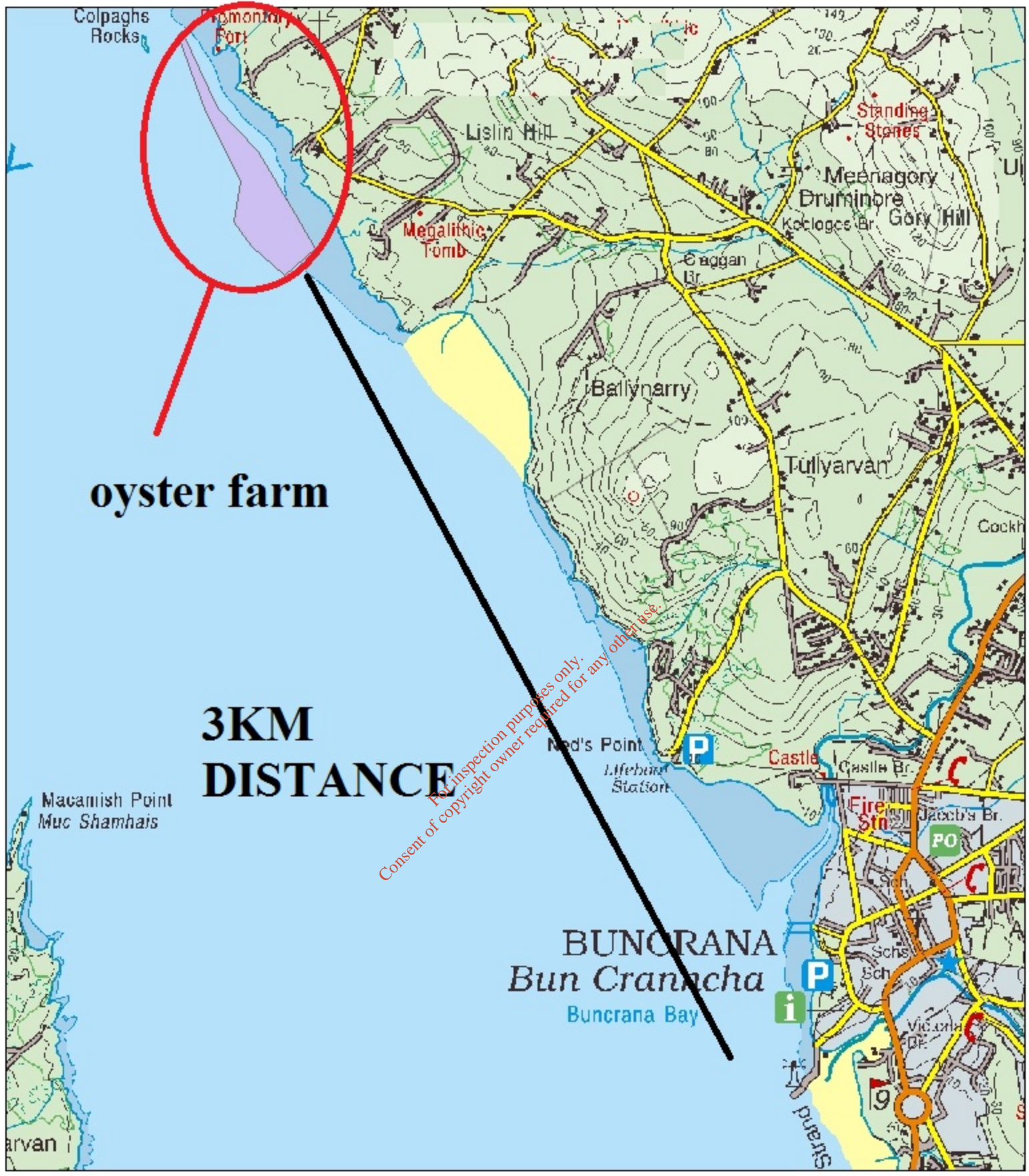
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An Roinn Talmhaíochta, Bia agus Mara

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