



HOOK HEAD

OYSTERS

Environmental Licensing Programme

Office of Environmental Sustainability

P.O. Box 3000

Johnstown Castle Estate

Co. Wexford

Environmental Protection
Agency

27 FEB 2018

Environmental Licensing

26th February 2018

Dear Sir/Madam

RE: Dumping at Sea Permit Kilmore Quay Harbour EPA Ref: S0030-01

As an interested party in the proposed dumping at sea initiative, we at Hook Head Shellfish would like to outline our concerns and make the following comments:

Firstly, we understand the necessity to maintain the harbour at Kilmore as an important port for the fishing industry. However, the disposal site for the dredged material is completely unsuitable in proximity, to the mouth of Bannow Bay, coupled with the heavy metal content contained in the dredged material makes the possibility for disastrous consequences to the well-established Oyster industry a highly likely event.

We have been producing top grade, world class oysters for almost 30 years, and are therefore very familiar with the hydro-flow aspects of the Bay. Bannow is a sheltered bay with weak flushing on certain tides and thus is prone to sedimentation at the mouth of the bay. Narrowing the mouth of the bay would cause increased sedimentation within the bay and reduce water quality especially in algal blooms all of which would negatively impact our oyster production in terms of quality and mortality rates.

Furthermore, in relation to the heavy metal content found in the random sampling deemed "low" we are concerned the number of samples taken were not high enough to make this conclusion. Also of concern is on which parameters is "low" measured? Its effects on the environment or its effect on shellfish? Heavy metals can be toxic to oysters, therefore further investigation is needed in this area as the possibility for TBT and other toxic metals may still be in the substrate, which the scant information has not detected conclusively.

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Moreover, the 40,000 tonnes of dredge spoil would we believe be brought towards the mouth of the bay during spring flood tides and even during winter storms. We have noted that in Appendix 3 the Tidal model outputs are only shown for the immediate area around Kilmore Quay (not the dump site) and also only for the period immediately before and after low water and high water. I would have expected mid flood and mid ebb scenarios as normally that is when the strongest currents are reached. There are no model outputs for the disposal site shown in the document at all despite saying earlier in that the document that they would be in Appendix 3.

In conclusions fishing is a vital industry in our rural area, but equally as important is the lesser known oyster production. Our bay produces 500 tons of top class oysters annually, with an export value of approx. €3,000,000. We hope to grow our own brand domestically and globally in the coming years and the proposed actions seriously question our investment.

We propose the properly sampled dredged material is disposed as far off the coast as possible South-East of the Saltee Islands and nowhere in the vicinity of the Bannow Bay, and also request GPS tracking of the disposal runs be a condition of the permit.

Yours Sincerely,

[Redacted Signature]

Director of Hook Head Shellfish Limited

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