

26th February 2018

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Environmental Licensing Programme

Office of Environmental Sustainability

P.O. Box 3000

Johnstown Castle Estate

Co. Wexford

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

Dear Sir/ Madam,



Having reviewed the documents for the proposed licence I have the following comments to make:

I have no issue with the maintenance of the harbour at Kilmore Quay as it is an essential Harbour for the fishing fleet.

The disposal site for the dredged material is too close to the mouth of Bannow Bay and I believe that it could cause sedimentation of the mouth of the bay and reduce flushing of the bay.

I have been a successful oyster farmer in Bannow Bay for over 26 years now and I am familiar with the nature of the bay. Bannow Bay is a sheltered bay with weak flushing on certain tides and thus is prone to sedimentation 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 and seafood trail 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.

The 40000 tonnes of dredge spoil would I believe be brought towards the mouth of the bay during spring flood tides and even during winter storms. I note that in Appendix 3 the Tidal model outputs 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. 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.

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

Thus given the above I would be asking that the dredge spoil be dumped somewhere east of the Saltees and not in the vicinity of Bannow Bay.

Yours Sincerely,

Tomás Ffrench



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