



### Submission

Submitter:	Mr Peter Thompson
Submission Title:	EPA Submission re licence application by Dairygold
Submission Reference No.:	S005599
Submission Received:	11 July 2019

### Application

Applicant:	Dairygold Co-Operative Society Ltd and TINE Ireland Ltd
Reg. No.:	P1103-01

See below for Submission details.

Attachments are displayed on the following page(s).

For inspection purposes only.  
Consent of copyright owner required for any other use.

**Submission to the Environmental Protection Agency on the licence application by Dairygold Co-Operative Society Ltd and TINE Ireland Ltd**

**Licence application registration number P1103-01**

**Submitted by Peter Thompson on behalf of: Carrigtwohill Environmental Alliance (CEA)**

It is with grave concern that we are lodging this submission to the EPA in relation to the proposal by Dairygold Co-Operative Society Ltd and TINE Ireland Ltd to pump 4 million litres of waste water daily from their new cheese factory in Mogeely and discharge it into the inner reaches of Cork Harbour .

CEA have long campaigned for the protection and sustainable development of Cork Harbour and vicinities and recently received notification that the area of the North Channel has been granted full Special Area of Conservation status. This is entirely appropriate given the sensitive nature of this estuarine eco system and it's rich diversity of bird and other wildlife.

We are most alarmed by the seeming contradiction between the Dairygold / TINE Environmental Impact Statement, and that of research carried out by NUIG.

Dairygold / TINE's report states: *"over the 6+ hour period between ebb tides, water will undergo an ~80% exchange so that the subsequent discharge event will occur on new water coming in rather than the column which has gone out on the preceding tide."* (see item 1 in references below).

This does not seem to be in line with more recent, up to date research on the hydrodynamics of Cork Harbour which indicate that water in the inner reaches of Cork Harbour takes significantly longer to discharge than proposed in the Dairygold / TINE EIS.

A 2012 study on tidal flushing in Cork Harbour titled as *"An integrated approach to trophic assessment of coastal waters incorporating measurement, modeling and water quality classification "* and was carried out by Prof. M. Hartnett, S. Nash, I. Olbert (College of Engineering & Informatics, National University of Ireland, Galway, Ireland) 2012, states:

*"The spatial variation of residence times provided a very good insight into the hydrodynamic circulation patterns of the harbour; for example they enabled easy identification of areas that are well mixed with a high rate of tidal exchange and other areas such as the North Channel that are quite poorly mixed and are thus a potential site for eutrophication. A number of areas were identified within which the residence times were quite similar; it was on this basis that the harbour was divided into the seven sub-regions.*

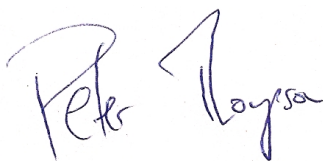
*The names of the sub-regions and their spatially averaged residence times are:*

- 1) Lee Estuary - 3.8 days;
  - 2) Lough Mahon - 31.4 days;
  - 3) North Channel - 64.4 days;
  - 4) Owenacurra Estuary - 53.1 days
  - 5) Harbour (west) - 26.2 days;
  - 6) Harbour (central) - 10.7 days;
  - 7) Harbour (east) - 47.1 days.
- (see item 2 in references below).*

This NUIG study is in line with our observations of the hydrodynamic circulation patterns from living on the North channel and utilising the water for the recreational purposes outlined below. The contradiction between Dairygold / TINE's EIS and the NUIG study is alarming and leads to concern about the impact of the accumulation of deposits of fats, oils and grease in the water and on the shoreline of the North Channel. The implications of these accumulations of fats, oils and grease are clearly far reaching and we have serious concern for the impact on wildlife and recreation in the harbour area. The North Channel is currently used for a wide range of recreational activities including walking, fishing, swimming, kitesurfing, wakeboarding, waterskiing, bird watching, boating and sailing. At a time in Ireland, where the outdoors is being accessed and utilised by people with increasing frequency, it is vital that any development in areas of special conservation and of high recreational value, is carefully planned and great care must be made to ensure that it is done in a sustainable manner.

We hope these concerns will be taken into consideration and investigated by the Environmental Protection Agency before granting a licence to Dairygold / TINE.

Yours sincerely,



---

**Peter Thompson MIACP, MIAHIP, Co-chair CEA**

## **References**

1. "S.5.5.10 Habitats, p. 60 of the Dairygold EIS.
2. An integrated approach to trophic assessment of coastal waters incorporating measurement, modelling and water quality classification" M. Hartnett, S.Nash, I. Olbert (College of Engineering & Informatics, National University of Ireland, Galway, Ireland) 2012.