



### Submission

Submitter:	Mr Jim Clohessy
Organisation Name:	TopFisher.eu
Submission Title:	Angling Objection to proposed licence
Submission Reference No.:	S005636
Submission Received:	07 August 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).

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## Submission on behalf of Jim Clohessy/TopFisher.eu and East Cork Bass Alliance.

**With reference to the application from Dairygold to pump effluent into waters at Rathcoursey Co.Cork. P1103-01**

We have concerns considering the above licence application on many grounds but for the purpose of this submission we will confine ourselves to our concerns considering the wellbeing of two important fish stocks – Bass (*Dicentrarchus labrax*) and Thick Lipped Grey Mullet (*Chelon labrosus*).

Having studied the relevant passages of the submitted EIS we have serious concern how the EIS simplifies the tidal activity in the East Ferry area. The EIS states that effluent “will be discharged at the ebbing tide” – This gives the impression that all effluent will be taken by the ebbing tide to the open sea. We are of the opinion that this is an over simplification of the tidal process in the area and is both misleading and in error.

The outflow point is 13km from the open sea. In our many years of angling experience we would note that while the movement of water through East ferry is considerable it is not enough to flush effluent to the southerly mouth of the East Passage not to mind to the open sea. The ebb tide does not flow at consistent rate. Rather it builds to a peak at mid-tide and then eases to the slack water period at low tide before flooding again. In times of neap tide the tidal flow is quite small while at spring tides the tidal flow is quite brisk.

In recent weeks (July 2019) there has been a profusion of dinoflagellates in the cork Harbour area. The waters of the channel at East Ferry are stained brown with over six weeks. If the flow was such as to flush out the system one would assume that the current bloom would be cleared rapidly by the ebbing tide. This is clearly not the case. It is our contention that effluent pumped in at Rathcoursey will largely stay in the upper harbour system to the detriment of the habitat and ultimately of fish stocks.

We are not against development. We are against poorly conceived development.

The levels of angling tourists travelling to Cork will be effected by a drop in stocks and/or a perception that our waters are not of top quality and capable of supporting decent fish stocks.

It would be only fair that before considering the application to pump, that there should be an independent EIS carried out to determine the facts and to clarify whether tidal movements are indeed enough to purge the system from Rathcoursey to Roche's Point.

There is further information attached on the angling in the area.

Regards,

Jim Clohessy

[www.topfisher.eu](http://www.topfisher.eu)

## Notes:

### On East Ferry and angling:

*“East ferry is somewhat of an enigma amongst bass anglers. The lower channel between the mouth and the marina at Marlogue can be one of the most productive bass fishing areas. The upper area of the channel produces some fine bass as well. In inclement conditions the “conger hole” a deep area close to the rocks near the marina is just that – a good area to fish for congers in bad weather! The choices here are many – try drifting the area using soft plastic baits, anchor close to the shoreline with crab baits or even try a live bait. The upper areas of the ferry, where it opens up to the east and west, like the upper regions of the Lee estuary are largely undiscovered waters. Bass can be had in these areas as well as flounders and the inevitable doggies. Few boat anglers fish in these areas – why would you when you have so many other areas to work in – but it could just be the area that produces that superb double figure bass.”*

Apart from being incredibly diverse in terms of its sea angling opportunities, anecdotal evidence suggests that East Ferry and the estuary to the north are areas that are starting to return to previous levels of prolificacy in terms of some fish species. The impact of the water and habitats directives cannot be underestimated.

Apart from bass, salmon and sea trout fish species caught in the area include: Flounder, thornback ray, silver eel, conger eel, mackerel, pollack, whiting, poor cod, ballan wrasse, cork wing wrasse, goldsinny wrasse, grey gurnard, tub gurnard, cod, thick lipped mullet, golden grey mullet, thin lipped mullet, smelt, various goby and blenny, scorpion fish, dab and various rockling. In recent years we have had a catch of smoothhound – not seen for many many years. Could we see the return of tope given the correct environment?



*East Ferry bass – This fish pictured above was caught and released in the lower part of East Ferry near the church. The fish was tracked via an acoustic transmitter and she migrated in early November and returned the following April. The fish was 78cm long and weighed 10.7lbs. A bass of this size would be more than 20 years of age.*

## Sea Bass

Sea bass are a species that are protected by law as a sport fish. There is no commercial fishing allowed. Bass are a migratory species and fish migrate into summer feeding areas each year. Cork Harbour is a very important bass habitat.

Bass migrate to the exact same stretch of water each year. In simple terms a fish resides each summer near the church at Marlog will return to that exact area year after year. If fish are killed in a particular area there may be no way for those areas to ever recover as bass holding areas. The majority of anglers practice catch and release although there is provision for an angler to retain one fish in twenty four hours. Bass are a slow growing long-lived fish with a 10lb specimen attaining 20+ years.

A major study carried out by UCC and local bass confirmed this location fidelity more can be read here:

<http://www.topfisher.eu/new-research-findings-can-help-save-sea-bass/>

And the study can be downloaded here:

<https://www.nature.com/articles/srep45841>

## Grey Mullet

The grey mullet in Cork Harbour has suffered from uncontrolled commercial fishing in recent years. Stocks are severely depleted. Apart from a netting incident that netted 120,000+ fish there has been uncontrolled netting in the north channel and the little island area. Stocks are starting to recover with some fish beginning to appear in areas where they were absent, especially along the Cobh shoreline at the North channel. There is further reading about our threatened mullet here:

<http://www.topfisher.eu/our-mullet-missing/>

## www.topfisher.eu

Is a popular Irish-based angling website. It presents articles on all disciplines of angling in Ireland. It has a large readership both at home and abroad.

## East Cork Bass Alliance

Is a loose organisation of bass anglers largely based in the Cork region who have formed an organisation to combat illegal activity in relation to bass. The members meet with Inland Fisheries Ireland (IFI) on a regular basis to discuss the current levels of activity and provide an "eyes on the ground" service to IFI.