



### Submission

Submitter:	Mr Michael McPartland
Organisation Name:	Inland Fisheries Ireland
Submission Title:	Reg. No P1103-01 Dairygold, Mogeely, Co.Cork
Submission Reference No.:	S005677
Submission Received:	26 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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26 August 2019

Re: Reg No. P1103-01. Dairygold Co-Operative Society Ltd and TINE Ireland Ltd, Mogeely, Cork.


A chara,

Reg No. P1103-01 refers to an application to discharge trade effluent from a Dairygold Co-operative Society Ltd facility at Mogeely to the waters of Cork Harbour at Rathcoursey. Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management and conservation of the inland fisheries resource. Ireland has over 70,000 kilometers of rivers and streams and 144,000 hectares of lakes all of which fall under the jurisdiction of IFI. The agency is also responsible for sea angling in Ireland. Key to the protection and conservation of fisheries is the availability of waters of adequate quality to support the resource. IFI would make the following comments on the application Reg No. P1103-01.

The impact assessment report (T Bruton, J Walshe) submitted in support of Reg No. P1103-01 recognises *"The Great Island Channel is an SAC, an SPA and a proposed NHA and there are designated shellfish waters in the Great Island Channel and in the lower harbour off Rostellan"*. Both of these areas are in close proximity to the proposed discharge. Furthermore the report identifies that both the Great Island Channel North and Owenacurra Estuary are Nutrient Sensitive Waters at risk of not achieving good status while the Greater Cork Harbour area is also at risk of not achieving good status and that *"the existing winter DIN background level is above the EQS target for Good Status"* in the vicinity of the outfall.

It is clear the proposed receiving waters are already at risk, primarily due to nutrient loadings from miscellaneous sources. The current application would involve the importation of effluent from a separate hydrological catchment for disposal in already challenged receiving waters. In such a scenario it would seem that in the first instance priority should be given to identifying, quantifying and reducing current nutrient inputs to Cork Harbour from within its own catchment area in order to meet our water quality obligations rather than permitting the importation of additional discharges which will increase the overall loading.

Yours sincerely

  
Michael McPartland  
Environmental Officer