



Submission

Submitter:	Miss Deirdre O'Shaughnessy
Submission Title:	Concerns for Cork harbour
Submission Reference No.:	S005891
Submission Received:	16 December 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.

I, Deirdre O'Shaughnessy, am concerned about the impact statement and associated documents accompanying the present application from Dairygold TINE and wish to submit an objection for the following reasons:

1. Lack of acknowledgment in the NIS (Nature Impact Statement)) that upstream pollution {i.e. in to the Great Island Channel} would cause adverse effects on the water quality in a part of Cork Harbour that is categorised as both SAC (Special Areas of Conservation) and SPA (Special Protected Area)

2. Lack of acknowledgment in the NIS of the adverse effect of pollution released downstream [i.e. into other parts of the Cork Harbour} on the protected species in Cork Harbour SPA

3. Lack of analysis in NIS of the Possible deposition of Fat, Oil and Grease(FOG) on the surface of mudflats and the effect of such deposition on feeding birds.

4. Erroneous claims in the NIS that there will be no significant effect on water quality.

Slow Water turn over in the Harbour

NUI Galway research demonstrates that any discharge from the Rathcoursey Outlet will circulate and remain around East Ferry and the Great Island North Channel for up to two months before exiting the harbour.

Tine need to demonstrate beyond reasonable scientific doubt that long term exposure to FOG will have no detrimental effect on the Special Areas of Conservation and Special Protected Areas.

Lack of Appropriate Assessments

As part of the application process, because the proposal potentially impacts on two European protected sites (the Cork Harbour Special Protected Area and the Great Island Channel Special Area of Conservation), it is necessary to carry out Appropriate Assessments as specified by legislation. The legislation framework is laid down in the Habitats Directive (92/43/EEC) and Birds Directive (79/409/EEC), and transposed in the European Communities (Bird and Natural Habitats) Regulation 2011

I ask to see your assessment findings...All four Stages of your findings...the four stages are listed below:

1. Screening

2. Detailed analysis in the Nature Impact Statement...If NIS cannot rule out adverse effects on species protected in the SAC and SPA sites, then analysis should proceed to stage 3

3. Alternative Solutions...if none exist

4. Imperative reasons of overriding public interest for allowing project to adversely affect a Natura 2000 site

I object to the fact that Dairygold/TINE have not sought alternative solutions nor offered “imperative reasons of overriding public interest” as is required by European and Irish Law I therefore consider that the applicant should be required to proceed to the third stage (as illustrated above), and to consider alternatives to the proposed discharge of wastewater into the Harbour

Local Impact Statements

...Smell of sewerage...residue, silt, dead flora fauna...and what will happen when 4,000,000 lts of FOG are discharged on top of this daily...

Lastly, it is our understanding that under Regulation 42/(12) of the European Communities (Birds and Natural Habitats) Regulations 2011, Appropriate Assessment should take account of “any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project”. Which would imply that alternatives suggested in formal submissions should be given consideration during the process.

Here are some alternative solutions for treating the waste water: construct wetlands

Irrigation of short rotation willow coppice

Irrigation of farmland.

As required by Irish and European law, please consider my submission and I await your response.

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