

Dorota Richards

Subject: Technical amendment to Dumping at Sea Permit Reg: S0012-03
Attachments: S0012-03 Dumping at Sea Permit Technical Amendment by Port of Waterford Company for dredging Waterford Harbour.doc

From: Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>
Sent: Wednesday 15 April 2020 11:34
To: Licensing Staff <licensing@epa.ie>
Cc: David McNerney <David.McNerney@fisheriesireland.ie>
Subject: Technical amendment to Dumping at Sea Permit Reg: S0012-03

Dear Sir/Madam,

Please see attached a copy of the IFI submission regarding the proposed technical amendment to this Dumping at Sea Permit.

Yours faithfully

Donnachadh Byrne
Senior Fisheries Environmental Officer

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D'fhéadfaí go bhfuil an ríomhphost seo agus ceangaltáin ar bith atá in éineacht leis faoi rún agus iad beartaithe d'úsáid an duine a bhfuil a s(h)eoladh air amháin. Dearthaí nó tuairimí ar bith atá curtha in iúl ann, baineann siad leis an údar amháin, agus ní chaithfidh go n-aontaíonn Iascaigh Intíre Éireann leo. Mura tusa faighteoir beartaithe an ríomhphoist seo, ná déan rud ar bith mar gheall ar an méid atá ann, ná é a chóipeáil ná é a thaispeáint do dhuine ar bith eile. Déan teagmháil leis an seoltóir, le do thoil, má chreideann tú go bhfuair tú an ríomhphost seo trí earráid.

Environmental Licencing Programme
Office of Environmental Sustainability
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
County Wexford

14 April 2020

Application for Technical Amendment to Dumping at Sea Permit Reg: S0012-03

Dear Sir/Madam,

Inland Fisheries note that the site of this licence is within the transitional waters of the Rivers Suir, Nore and Barrow SACs. The Nore, Barrow and Suir Estuary is one of the larger and more environmentally important transitional water bodies in Ireland.

Estuaries and inshore waters provide significant nursery habitat for the larval and juvenile forms of (transitional and marine) fish species, in addition to providing shelter and food for many young/adult fish, crustaceans and shellfish. These in turn provide food resources for other levels of the trophic chain including shore birds, waterfowl, larger fish and marine mammals. Intertidal areas host high densities of benthic fauna in particular worms and molluscs. This in turn makes them important habitats for juvenile fish such as bass & flounder, and juvenile crustaceans such as crabs which inhabit such habitats in high numbers.

The majority of fish in estuaries, feed primarily on the benthos and thus live a demersal existence. Estuarine fish can generally be divided into a number of groups:

- Estuarine dependant (opportunists) species typically enter estuaries from the sea for a period each year but do not stay permanently. The majority of these species drift into estuaries as larvae and when as young fish they become demersal, they take advantage of the rich benthic food sources available in sublittoral and intertidal estuarine habitats. Estuaries contain large numbers of '0 group' fish that use them as nursery grounds before migrating to the sea as recruits to adult populations. The waters of the Suir Barrow Estuary represent some of Irelands the most important sea bass nursery habitat.
- Marine stragglers enter estuaries irregularly and are often restricted to the seaward end (usually low in numbers of individuals)
- Riverine species come from the freshwater end of the system and are mainly found in low salinity waters.
- Truly estuarine species (residents) comprise only a small number of species although they may form a high overall biomass. The gobies are most typical of this group as they are found in estuaries around the year.
- Migratory species use the estuary and inshore waters as a route from rivers to the open sea or vice versa. Most of these species are anadromous (breed in freshwater) e.g. the

lampreys, the shads and the salmon (*Salmo salar*)/sea trout (*Salmo trutta*). Eels (*Anguilla anguilla*) are catadromous and breed in the sea.

In addition to the above the majority of the Irish populations of Twaite Shad reside in the Nore/Barrow and Suir River systems. This species which is an Annex IV species under the European Habitats Directive spawns in the upper tidal area of these rivers, the transitional waters of these rivers represent the principal nursery habitat for the Irish populations of this important species.

The National Report for Ireland on Eel Stock Recovery Plans published by the Department of Communications, Energy and Natural Resources in December 2008 states that “The latest scientific advice from the International Council for the Exploration of the Sea (ICES) concerning European Eel is that the stock is outside safe biological limits and that current fisheries are not sustainable. A significant proportion of the European eel stock remains in transitional waters and the European Eels of the transitional waters of the Suir/Barrow Rivers represent a nationally important population of this threatened species

The Department of Agriculture, Food and the Marine document, “Consultation Paper on Minister’s review of Trawling Activity inside the 6 Nautical Mile Zone”, states “*The Marine Strategy Framework Directive (MSFD) requires that biodiversity and seafloor habitats are at good environmental status (GES), meaning that the diversity, structure and function of marine life on the seafloor is maintained. The Habitats and Birds Directives have more specific requirements for species and habitats coming under their remit and generally require that species and habitats are maintained at Favourable Conservation Status (FCS)*”.

As stated above the Suir, Nore/Barrow estuary represents nationally important nursery habitat for numerous species of pelagic and demersal fish including flatfish, rays, herring and whitefish. Damage to these habitats can have disproportionate effects on certain fish stocks by impacting on spawning and juvenile fish, not only damaging inshore stocks but also affecting recruitment to offshore populations.

IFI note the statement from the applicant that “The Port is confident that the results obtained demonstrate that the proposed ploughing will reduce dredged tonnage from Cheekpoint, and consequently the tonnage dumped at sea, and by undertaking the works during the Spring tide period, that the effects are temporal and comparable to natural background levels”.

IFI request clarification on whether ploughing/levelling works at this location will be confined to the Spring tide period over the full year, or if the undertaking to limit ploughing at Cheekpoint to Spring Tide periods is limited to the months March – June only.

Yours faithfully,

Donnachadh Byrne
Senior Fisheries Environmental Officer.

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24