

Eve O'Sullivan

Subject: FW: Permit S0012-03

From: Cian Daniels [REDACTED]
Sent: 20 April 2020 21:05
To: Licensing Staff <licensing@epa.ie>
Subject: Permit S0012-03

To whom it may concern.

The East Waterford Lobster Fisherman's Association wishes to raise some concerns about the application by the Port of Waterford Company for amendment to permit S0012-03, for the disposal of dredge material at sea.

The Port of Waterford Company engaged in dredging and dumping operations some years ago and our Lobster Fishermen have always been worried about the potential damage to the area around the dumpsite and to our lobster stocks. We have worked hard to protect Lobster stocks over the last 25 years, employing the lobster 'V' notching stock enhancement programme, part funded by BIM.

We have always believed that the mud plume from the dumping activity could smother the vulnerable juvenile lobsters and possibly affect other species too. Some of our members also fish for shrimps in the area during the winter months. The application for a proposed amendment for a dumping at sea permit S0012, allows for the dumping of [7,253,856 tonnes from 2020 to 2025](#).

Since Dredging and Dumping operations began our lobster fishermen at times and in certain areas have seen mud on lobster fishing gear where it has never been seen before.

We would like to ask the Port of Waterford Company the following:

- Have any environmental impact studies been done to date on the effects on and around the dumpsite since operations began?
- Does the spoil from the dumpsite stay in one place, therefore creating a mound or has all or some of it dissipated, therefore potentially smothering the surrounding area?
- We would also be concerned about the impact of ploughing activities proposed in the application for amendment to Permit S0012-03. Would there be adverse consequences eg. turbidity of the water from the related displacement of the spoil and potential for smothering of adjacent marine habitat?
- Will the proposed increase, in dumping, in the same area create an even bigger mound or will it dissipate and create an even bigger plume, that would smother an even bigger area than before?
- Can a study be done now before the next dredging/dumping campaign begins, so that East Waterford Lobster Fishermen can see before and after results for comparison, to allay their fears and prove the anecdotal evidence is incorrect?

Yours faithfully,

Cian Daniels

East Waterford Lobster Fisherman's Association.