

**Eve O'Sullivan**

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**Subject:** Re- Amendment to permit #S0012-03 for the disposal of Dredge material  
**Attachments:** EPA230420v2.docx

**From:** Peter Guy [REDACTED]  
**Sent:** 23 April 2020 19:40  
**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>  
**Cc:** [REDACTED]  
**Subject:** Re- Amendment to permit #S0012-03 for the disposal of Dredge material

Licensing Dept EPA

Dear Sir or Madam

To whom it may concern, please find the attached letter below in regard to the Amendment to permit #S0012-03 for the disposal of Dredge material.

I look forward to hearing from you soon.

Yours Sincerely

Pat Moran

[REDACTED]

e mail: [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23/04/20

Licensing Dep EPA

**Ref- Amendment to permit #S0012-03- for the disposal of Dredge material.**

Dear Sir/Madam

I would say that section 3.4 – A-5 is a perfectly reasonable condition and the least that should be attached to a permit that probably should not have been given in the first place. Plough Dredging and Suction Dredging on the scale it has to happen in Waterford estuary to try and achieve the unachievable is unsustainable.

What good the SAC designation or any EU directive? I think at least four of the migratory fish stocks are on the endangered list Salmon-Eels-Shad-Lamprey. Is Waterford estuary a big part of the problem for the decline in stocks of these species?

**March-June – To Protect Migratory Fish**

Spring Salmon enter and Salmon Smolts leave during these months. Glass Eels enter and I understand Glass Eels stay in the mud-sand during ebb tide and go up on the flood tide. Trout would have dropped down during the winter and would hang around the estuary and would go back up around this time period also. Black sole enter and go up above Waterford city during February-March-April time and stay until October. Shad are later and I think Lamprey can be late and early around this time period. Flounders that were one time numerous but are not now are also migratory in this time period.

Mussels have gone from the Waterford estuary? The estuary is no longer EU directive compliant for Mussels.

I am very surprised and shocked by the Inland Fisheries Ireland (IFI) letter when the supporting documentation around modelling and sediment amounts and where the sediment flows too as a result of the ploughing is so contradictory. The results around heavy sedimentation at low water downstream should be of major concern to the IFI as everyone knows how important the low water hour is to all species. To alter 30 minutes of that hour must have monumental consequences for all fish species especially the Salmon.

Is Plough Dredging into Cheekpoint Pier covered by this permit?

Has condition 3.4 been removed already at least 6 days in March and yesterday 22 April?

Yours sincerely

Pat Moran

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