



Submission

Submitter:	Mr Alex Crowley
Organisation Name:	National Inshore Fisheremen's Association and National Inshore Fisheremen's Organisation
Submission Title:	Submission on P0606-04
Submission Reference No.:	S009930
Submission Received:	21 March 2021

Application

Applicant:	SSE Generation Ireland Limited
Reg. No.:	P0606-04

See below for Submission details.

Attachments are displayed on the following page(s).

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Cahirciveen,
Co. Kerry,
V23 H985
20 March 2021

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

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Re: Application by SSE Generation Ireland, Limited for revision to IPC Licence P0606-04 at
Great Island Generating Station, Campile, New Ross, Co. Wexford

Dear Sir/Madam,

To Whom it may concern,

As you may be aware the National Inshore Fishermen's Association CLG (NIFA) was established in 2017 to represent Inshore Fishers, who operate vessels of less than twelve meters overall length, that meet the European Maritime Fisheries Fund (EMFF), Small Scale Coastal Fishers (SSCF) definition. NIFA works closely with the National Inshore Fishermen's Organisation CLG (NIFO) which was also established in 2017, to represent Inshore Fishers, who operate vessels of less than eighteen meters overall length, that do not meet that definition. Combined the two groups now have one hundred and seventy eight members

nationally. These members, between them, operate approximately two hundred, commercial Inshore, fishing vessels. Of these members sixteen are based in counties Waterford and Wexford and would operate in the vicinity of the Waterford estuary to varying extents. Other members based outside of Waterford and Wexford would also operate seasonally in the Estuary.

The Waterford Estuary supports a wide range of commercial fisheries which are of significant economic importance to many of these members, and indeed other commercial fishing operators. These fisheries include, inter alia, Potting for shrimp, whelk, lobster, velvet and green crab, Pelagic trawling for Sprat and Herring and dredging for various bi valve species. The wider sea area further south in to which the estuary flows also supports a wide range of important commercial fisheries which are of interest to many of our members. It is an important spawning ground for a number of commercially important species including Celtic Sea Herring.

The viability of these fisheries depends on a great extent of the water quality in the estuary and anything that could negatively impact that is obviously of serious concern to our members. Since the granting of the original licence (P0606-03) members involved in fisheries for more residential species such as shrimp, whelk and velvet crab report a noticeable decline in these fishery's. Significant die off in bi valve shellfish species in the general area have also been reported. The effects of Sodium Hypochlorite on Marine life are well documented and members report that seaweed no longer even grows in the intertidal zone for some miles downstream of the current outfall pipe. The attached pictures were taken at low water, approximately seven miles downstream in an area where dense amounts of seaweed previously grew in the intertidal zone. Despite what is published on your website about "foaming" members are also concerned about it. (again pictures attached)

Members concerned are convinced that the actions carried out under the existing licence have had a significant negative impact on marine life in general in the area, including commercially valuable fish stocks which by extension has had a significant negative economic impact on the viability of their businesses. The existing licence grants an annual discharge of 5 tonnes when in the discharge is noted on your website as being in the region of 1300 tons. This was something we understand that the EPA discovered by coincidence. It is our view that application P0606-04 seeks to legitimise the increase volume of Sodium Hypochlorite discharged of in excess of twenty fold that has been in breach of the existing licence conditions and has been detrimental to the economic viability of our members. The by On that bases both NIFA and NIFO strongly object to the granting of licence application P0606-04 and feel strongly that the conditions of (P0606-03) need to be strictly adhered to as a minimum.

Regards,

Alex Crowley,

General Secretary, National Inshore Fishermen's Association CLG (NIFA)