

Eve O'Sullivan

Subject: Dumping at Sea permit

Importance: High

From: Hazel Chu [REDACTED]

Sent: 12 April 2021 16:53

To: Licensing Staff <L.Staff@epa.ie>

Cc: [REDACTED]

Subject: Dumping at Sea permit

Importance: High

Environmental Licencing Programme
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 2000
Johnstown Castle Estate
Co. Wexford

April 1st 2021

EPA Reg Number S0004-03: Observation RE application for Dumping at Sea Permit

A Chara,

I am writing to submit my observations regarding Dublin Port's application for a Dumping at Sea Permit, based on the below outlined concerns.

Contaminated Materials

In 2015, former Minister Richard Bruton named Dublin Bay as a biosphere reserve by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) in recognition of the area's unique ecological habitat and biological diversity. The use of Dublin Bay for the dumping of dredge spoil is in complete contradiction to this designation of the Bay as a UNESCO Biosphere Reserve. The EIS has claimed that an advantage of dumping within the Bay is that the material will remain within the Bay system. However, with the approximate amount of material to be dredged standing at 300,000 cubic metres per annum and consisting mostly of silt and sand with elements of clay, gravel and cobbles, it is clear that dumping this quantity of silt and sand within the Bay is not the best way to dispose of or reuse the material dredged. In the absence of an overall management plan for the Bay it is hard to understand how this claim can be made. Dumping this material, some of which is contaminated, so close to the coast and to Howth Head, has the potential alter tidal patterns and cause increased flooding to an amenity which is a huge tourist attraction.

While the dumping of dredged silt around Dublin Bay has been practiced since the 19th Century, the ecological impacts of such dumping now needs to be properly revaluated and alternatives assessed with a view to finding more appropriate ways to dispose of or reuse the material dredged. I do not believe that the dumping location can be justified or that the issue of heavy metal contamination of silt within the port has been adequately addressed to allow this application to move forward.

Protection of Marine Life

The application raises significant impact concerns on the ecology of the Bay in general and of the areas and species protected under the Habitats and Birds Directive. I believe that there is a particular issue in relation to the protected reef habitats, which are known to be susceptible to the impact of silt, and the Harbour Porpoise, a protected animal which feeds at this dump site and which could be at risk as a result of the proposed plans.

The applicant's Benthic and Fisheries Assessment states: "The loss of fish and invertebrates as a result of dredging can be categorised as slight adverse and short-term, as the vast bulk of what will be entrained will be the most widespread and common for inspection purposes only." "Slight adverse and short-term" is not good enough. Alternatives must be considered in order to determine if impacts could be completely avoided or reduced if a different land-based treatment or different part of the Irish Sea was used for dumping.

The applicant's water quality risk assessment also states "It is proposed to undertake the maintenance dredging and disposal at sea operations within the period April to September each year between 2022 and 2029. The dredging campaign within each of these periods is expected to last approximately 4-6 weeks, depending on weather conditions." The best practice for dumping at sea is to dump only in winds of less than force 4 and in daylight, as a mammal observer on the barge would spot Seals, Dolphins or Porpoise at the dump site which is a recognised foraging ground for them. It is therefore incredibly worrisome that there is no mention of this and that we are led to believe from the application that the dumping operations will be planned for day and night in mostly all weathers.

Amenity

Apart from accommodating commercial shipping, the Bay is a significant recreational amenity for swimming, sailing, canoeing, wildlife observation, diving and other activities. Divers using Dublin Bay will be greatly affected by amount of mud and material in the water, thus reducing their visibility. This would no doubt have the effect of making the water dangerous to dive in. It would also affect all seaweed and plants in the water that need sunlight to grow. Additionally, not only is the water "muddied" during dumping but also for the following year while the dumped material is swept off the dumpsite and displaced all over Dublin Bay.

I strongly believe that Dublin Port have failed to explore alternative uses for the material and that better alternatives must be explored if we are to protect Dublin Bay for future generations. In light of these concerns, I would ask that the EPA refuse this application.

Kind regards,

Lord Mayor Hazel Chu