



### Submission

Submitter:	Miss Liz Goff
Organisation Name:	South East RIFF
Submission Title:	Submission by SE RIFF to EPA on license application P0606-04 by SSE
Submission Reference No.:	S009959
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### 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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## South East Regional Inshore Fisheries Forum

Environmental Protection Agency  
PO Box 3000  
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18<sup>th</sup> April 2021

<b>Reg No.</b>	P0606-04
<b>Applicant Name:</b>	SSE Generation Ireland Limited
<b>Location of Facility:</b>	Great Island Generating Station, Campile, New Ross, Wexford.

To whom it may concern,

The South East Regional Inshore Fisheries Forum (SE RIFF) is one of 6 regional Inshore Fisheries consultative forums, at which members are representative of the ‘inshore sector’ fishermen using boats of less than 12m in overall length.

Established in May 2014 the National Inshore Fisheries Forum has been set up to facilitate the development of a coherent inshore sector “voice” by encouraging fishermen to discuss their fishing issues and generate commonly supported initiatives. The National Inshore Fisheries Forum (NIFF) is supported by a network of Regional Inshore Fisheries Forums (RIFFs) around the coast of Ireland. They have nominated delegates to bring forward regional proposals to NIFF for wider industry discussion. The RIFF members include inshore fishermen, environmental interests, marine leisure, marine tourism, processors (seafood added value) and other marine stakeholders.

The Inshore Fisheries Forums are facilitated by the statutory bodies responsible for marine fisheries in Ireland, namely Department of Agriculture, Food and the Marine, Bord Iascaigh Mhara, Sea Fisheries Protection Agency and the Marine Institute. Bord Iascaigh Mhara provides administrative support to the forums.

The South East RIFF covers the inshore coastal area of counties Wicklow, Wexford and Waterford. Further information concerning the South East RIFF and RIFFs in general can be obtained at <http://inshoreforums.ie/>

The link to the documentation for this proposed development has been sent to the members of the SE RIFF with the following observations made in particular by members with a knowledge of the area in question.

The SE RIFF wish to make the following points regarding this application.

The Waterford Estuary is a key fishery location for members of the inshore fishing fleet based both within the estuary and many others from local ports neighbouring it. These fisheries include;

- Shellfish/Bi valve molluscs such as razor and surf clams
- Whitefish and pelagic fisheries – important herring spawning area
- Pot fisheries - lobster, crab (brown/ velvet and green crab), shrimp and whelk towards and outside the mouth of the estuary

Many fishermen also have ties with traditional fisheries currently closed for conservation such as salmon and eels.

Of particular concern are mussel shellfish which provided a valuable employment/income for fishermen who participated in the mussel aquaculture initiative within the Waterford Estuary, and who wish to see this fishery restored and developed. However, as you may be aware this important fishery has not operated for a number of years due to the almost complete disappearance of mussels from the estuary. Of concern are the discharge practices of Great Island Power station of Sodium Hypochlorite which are perceived by fishermen and others to

have potentially impacted on the phytoplankton in the water column which acts as the foundation for most marine life such as filter feeders like mussels.

Fishermen are also concerned for other commercial species in the estuary. For example the sprat fishery in the estuary can be an important source of income in the winter months for small boats when other fisheries are more impacted by poor weather conditions etc. However large numbers of sprat have been seen (and recorded) floating dead in the vicinity of the power station outflow during the last season. Fishermen are also concerned about the decline of crustaceans within the estuary area.

The SE RIFF is concerned that license applications such as this one, are approved without a full environmental/ecosystem based impact study on marine life (including commercial fish/shellfish species) within the Waterford Estuary and neighbouring coastal area. We appreciate that there are numerous forms of discharges into the estuary and other activities such as dredging for silt to maintain shopping access. We therefore call for a full assessment/enquiry into the impacts of discharges into the Waterford Estuary by SSE including that applied for in this application before a decision is made. This study should investigate issues concerning the depletion of mussels in the area and the impact on other fish species, and on marine food chain such as phytoplankton.

The study must address the cumulative impact that this application would have in combination with other discharges to the marine environment.

A report on the findings should then be made available for consultation (including to the SE RIFF) before this and any other such license is considered.

The SERIFF firmly believe that conditions stated/contained within discharge permits need to be tightened up considerably with more stringent enforcement by the regulatory bodies such as the EPA. Of particular concern is the current monitoring regime, which allows for self-monitoring. This has been shown to be inadequate in this case where it has been stated that SSE have admitted to exceeding what was permitted on their licence by 1295 tons of sodium hypochlorite, without any visible/publicized enforcement/sanctions action taken against them.

With so much at stake with our water bodies, the level of statutory and independent monitoring required with real sanctions for breaches of licence conditions is vital, and must be transparently seen to be so. We recommend that consultation should take place immediately with stakeholders (such as those within the seafood sector) into giving such stakeholders a role/input into developing a more transparent monitoring system for this an all/the main discharges into the estuary. This, linked to a study on the impacts of discharges into the estuary, is vital in order to build confidence among the wider community including fishers that such industries are not impacting negatively on their livelihoods and the environment. If this is not done there is the growing potential of an overall negative impact on the clean image of the area that can affect the wider consumption/sale of seafood. This is not just the connection of this bad news story to local seafood but also regionally and national impacting not just on fishers but the wider economy, including seafood added value and ancillary services plus tourism sector employment etc.

We therefore state that the permit/license by SSE as applied for under this application be refused until these issues as stated above are addressed, or as a minimum more stringent controls are included. We further urge that a multi-agency/local authority forum with stakeholder participation that looks at discharges into the estuary as a whole be established, and that this body initiates asap a comprehensive study of the impacts of the wider discharges into the Waterford Estuary.

Regards,

Liz Goff,

Chair South East RIFF.

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