

**Eve O'Sullivan**

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**Subject:** Dublin Port DaS Application S033-01  
**Attachments:** Letter EPA S0033-01.docx

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**From:** [REDACTED]  
**Sent:** Thursday 30 September 2021 15:35  
**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>  
**Subject:** Dublin Port DaS Application S033-01

Please find enclosed my comment and observations on the above DaS application.

Regards

Peadar Farrell

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[REDACTED]  
[REDACTED]  
[REDACTED]  
30-9- 2021.

**DAS Application. Dublin Port S0033-01**

I ask that this application is not granted to Dublin Port and make the following observations.

Dublin Port are accumulating numerous Dumping at sea licenses and for much longer periods than before.

Should this be granted they will have 3 licenses operating in the same period. That is S0004-03. 8 years 2022 to 2029 : S0004-02. 15 years from 2021 : and this one S0033-01. For 8 years from 2022.

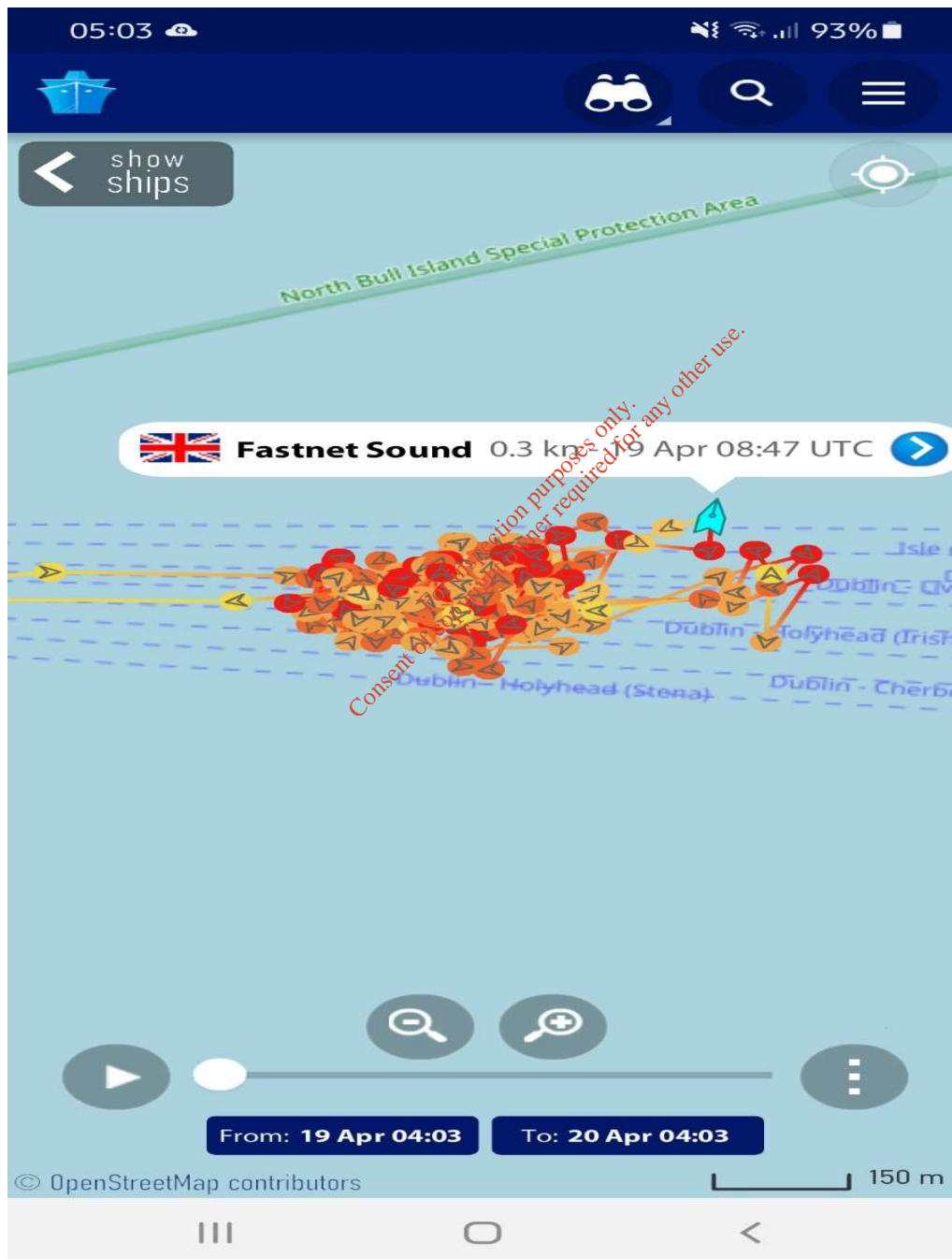
They would also be carrying out dumping on a continuous basis S0004-03. In the months April to September and S0004-02. and S033-01. October to March.

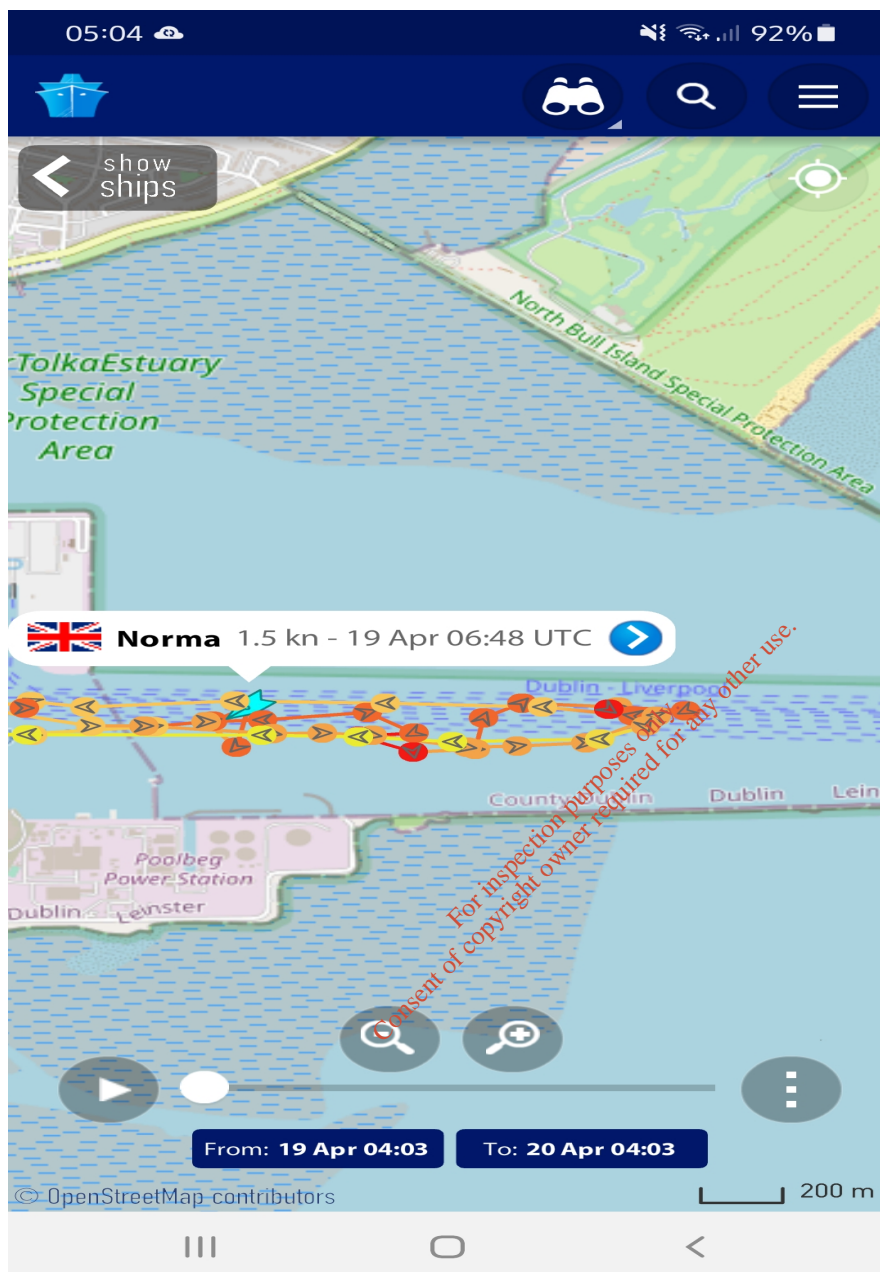
To examine these 3 permit applications individually I believe is very wrong as they are both overlapping and back to back. The dumping allowed for in each application into the exact same dumpsite must have an effect on the following on dumping and be affected by preceding dumping.

So, I would ask that the Environmental impacts of these 3-permit application be put together as one and fully examined, surely a logical thing to do as they are continuous operations. From the experience of the last 5 years of continuous dumping permit applications there will be more applications lodged every year by Dublin Port.

The dumping permits issued in the last few years are very well detailed and allow for a suction dredger to carry out the work of dredging and dumping. The entire study of the environmental impacts are based on one hopper dredger. Last year there were 3 vessels involved in dredging. 2 No. Bottom Ploughs or sea bed levelers and the hopper dredger. The effect of the bottom

ploughing by these 2 vessels was not considered in the environmental impacts. From the tracking of these vessels, it obvious that they preceded the suction dredger loosening up the sea bed, followed by the suction dredger followed by bottom levelling plough.





Both screen shots are from April 20<sup>th</sup> 2020. In all future applications the use of these 2 additional vessels must be examined I believe. Standing watching them work the plume of muddy water is evident behind them. Some examination is also now needed to ensure that Dublin Port are applying for dredging in areas where they have Planning permission for as it appears to me that they are seeking to extend out past these areas.

It should be apparent that Dublin Port do not need 3 Dumping permits active at the one time. There is only one Port and one dumpsite so please let's have one permit with all the environmental effect examined, please reject this application.

Peadar Farrell



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