

## Eve O'Sullivan

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**Subject:** Dumping at Sea Permit application, S0013-03  
**Attachments:** Port of Cork 21-1.doc

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**From:** Michael McPartland <[Michael.McPartland@fisheriesireland.ie](mailto:Michael.McPartland@fisheriesireland.ie)>  
**Sent:** Friday 3 December 2021 13:58  
**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>  
**Cc:** Roisin O'Callaghan <[Roisin.OCallaghan@fisheriesireland.ie](mailto:Roisin.OCallaghan@fisheriesireland.ie)>  
**Subject:** Dumping at Sea Permit application, S0013-03

A chara

Please find attached submission

Michael Mc Partland  
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Iascach Intíre Éireann  
Inland Fisheries Ireland

Environmental Protection Agency  
Environmental Licensing Programme  
Office of Environmental Sustainability,  
Wexford

03 December 2021

RE: Reg No S0013-03 Dumping at Sea Permit Application from Port of Cork

A Chara,

I refer to the above-mentioned application.

While IFI appreciates the economic significance of the proposed works, there is also a statutory obligation on IFI to protect and conserve fisheries. It is in this context that we make the following comments on the proposal.

- a) The concentration levels licenced for any parameter should not be at variance with those set out in the Department's "Guidelines for the assessment of dredge material for disposal in Irish Waters" document.
- b) The quantity of dredged material to be dumped should not exceed that licenced on previous occasions for any given year.
- c) Dumping should avoid herring spawning times in November and February.
- d) The proposal to undertake dredging during the salmon draft net fishing season is at variance with previous practices. Should a decision be made to permit this operational change IFI would suggest a provision is available in the Permit for dredging during the draft net season to be discontinued at short notice if found to be interfering with the operation of the Draft Net Fishery.
- e) IFI would ask that fisheries recommendations of the "Assessment of Benthic and Fisheries Impacts of the Maintenance Dredging in Lough Mahon and the Lower River Lee" Report be implemented.

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f) An ecological assessment and species quantification of the dumpsite area should occur pre and post dumping to permit impact assessment.

g) Water quality monitoring in relation to suspended solids should be built into the dredging regime on a daily basis

Yours sincerely

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Michael Mc Partland.  
Environmental Officer.

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