

**From:** OBrien, Grace <Grace.OBrien@agriculture.gov.ie>  
**Sent:** Monday 7 March 2022 11:31  
**To:** Licensing Staff  
**Cc:** Foreshore  
**Subject:** Our Ref: Dumping At Sea Application for Iarnrod Eireann at Rosslare Europort, County Wexford  
**Attachments:** dumpsites\_rosslare.jpg

**Our Ref: Dumping At Sea Application for Iarnrod Eireann at Rosslare Europort, County Wexford**  
**EPA Ref: S0016-02**

Dear Sir/Madam

I write in connection with this application.

Please see below BIM's comments/observations and attachment in regard to the Dumping at Sea Application (FW.6.25 EPA Ref:S0016-02) at Rosslare Europort, Co. Wexford. In addition I have attached a jpeg showing mussel seed bed locations and Iarnrod Eireann dumpsites.

It is BIM's view that it likely that this application could have an impact on both fisheries and aquaculture in the area of the proposed dumpsite for the reasons as outlined below:

**Aquaculture Impacts**

Seed mussel beds are a resource required by the National Bottom Mussel industry each year and the vast majority of seed mussel is harvested from the Irish Sea and **in particular close to the areas proposed as dumpsites**. Without seed mussel the industry will not survive. The bottom mussel industry is an aquaculture industry so when the applicant states that:

*-1.4 Aquaculture There are no aquaculture sites in the vicinity of the disposal site. The nearest shellfishery area of importance is approximately 10km from the site.*

they are incorrect as mussel seed collection under Fishery Management is an integral part of many bottom mussel aquaculture licenced businesses nationally.

The **offshore dumpsite** is close to a known historical seed mussel bed and could potentially impact the development of a seed mussel bed again in this area. We strongly suggest that the offshore dumpsite be moved further east and south of the Lucifer Bank. Furthermore the proposed **near shore dumpsite** for coarse sediment has seen mussel seed development in this area late last year with large quantities of seed mussel being washed up onto the shore directly west of the proposed site. As such we recommend that the proposed nearshore site (beach nourishment site) also be moved to east and south of the Lucifer Bank.

The bottom mussel sector is a sustainable seafood sector that provides protein at a very low carbon footprint. Bottom grown mussels also provide ecosystem services in bays by removing nutrients and exerting top down control on phytoplankton thus mitigating against potential eutrophication effects in bays where nutrient inputs and phytoplankton levels are high. As such any negative impacts on mussel seed bed formation in this area will also have knock on negative ecosystem impacts in bottom mussel growing bays nationally.

**Fisheries Impacts**

The area between Holdens Bed and the shore is a pot fishing area for a number of inshore boats mainly for velvet crab but also with catches of brown crab.

As has been pointed out above the general area is a mussel seed bed, which would be a food source for velvet and brown crab. Therefore it is very likely that that the dumpsite is having a negative impact on the pot fishing from this perspective.

The area north of the West Long Buoy is mainly pot fishing for whelk. The dumpsites shown in this area, mainly coloured in green potentially impact this fishery, from the build-up of dredge spoil but also from any impact on the mussel seed as an important food source also for whelk.

Any proposed reallocation of the dumpsites would need to be communicated to the fisheries sector with appropriate consultation. For example the area inside from a line extending north from Rosslare port to a line intersecting with that extending west out from Rosslare Point is a classified razor clam production area. There are other pot fisheries if you follow the coast south from Holdens Bed etc.

**“The Department of Agriculture, Food and the Marine has been advised of a potentially serious impact on aquaculture and fisheries in relation to the application, your reference number EPA Ref: S0016-02, Our reference FW.6.25. Please see the comments of BIM in the email below with map attached.**

**As the impacts are of such a serious nature, The Department is sending this to you for your immediate attention. Other comments, as may be returned to this Department will be forwarded in the normal response manner.”**

**Please acknowledge this email.**

Regards,

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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara


Tá an t-eolais san ríomhphost seo, agus in aon ceanglín leis, faoi phribhléid agus faoi rún agus le h-agmaigh an seolaí amháin. D’fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má

tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.

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# Legend


 larnrod\_dumpsite


 buoysMFAWgs


 2021


 2020


 2019


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
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
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
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
 1999


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