

Eve O'Sullivan

Subject: Reply from Inland Fisheries Ireland re : S0012-04 Port of Waterford Company - Dumping at Sea Permit Application
Attachments: IFI_Submission_PoW_202203.pdf; EPA re S0012-04 Port of Waterford Company - Dumping at Sea Permit Application

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>

Sent: Monday 14 March 2022 17:34

To: Licensing Staff <licensing@epa.ie>

Cc: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>; Planning Advisory <PlanningAdvisory@decc.gov.ie>

Subject: Reply from Inland Fisheries Ireland re : S0012-04 Port of Waterford Company - Dumping at Sea Permit Application

EPA reference S0012-04

Good afternoon,

Please see attached a reply from Mr Cormac Goulding & Mr Oliver McGrath (Fisheries Environmental Officers) and Mr Donnachadh Byrne (Senior Fisheries Environmental Officer) for EPA reference S0012-04 and the subject below. Please forward an acknowledgement of receipt to CorporateSupport.Unit@decc.gov.ie at your earliest convenience.

Regards,
Enda Brady,
Corporate Support Unit.

Enda Brady,
Corporate Support Unit,

An Roinn Comhshaoil, Aeráide agus Cumarsáide

Department of the Environment, Climate and Communications

Teach Leamháin, Bóthar Ghleann an Iarla, An Cabhán, H12 A8H7

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CorporateSupport.Unit@decc.gov.ie www.gov.ie/decc



Iascach Iníre Éireann
Inland Fisheries Ireland

Environmental Licensing Programme,
Office of Environmental Sustainability,
Environmental Protection Agency,
Johnstown Castle,
Co. Wexford

14 March 2022

Re: S0012-04 Dumping at Sea permit application from Port of Waterford Company

Location: Waterford Harbour

Submitted via email to: CorporateSupport.Unit@decc.gov.ie

To whom it may concern:

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource. The site of the dredging works spans the Lower Suir Estuary and Barrow Suir Nore Estuary. The current Ecological Status of the Lower Suir Estuary is *Good*. The current Ecological Status of the Barrow Suir Nore Estuary is *Moderate*. Both water bodies are *At Risk* of not meeting Good Status in the next WFD cycle.

In respect of the above application for planning IFI wish to make the following observations:

The dredging works have the potential to impact on fish passage into the Nore, Suir and Barrow Rivers and their associated transitional waters. Together these catchments drain an area of over 9,000km². Dredging is disruptive of the channel bed, disturbing its physical form and ecology by removing or destroying habitats and the species resident within or on the dredged area.

The freshwater and tidal reaches of the Barrow, Nore and Suir and Waterford Harbour are designated as Special Areas of Conservation or SACs under the EU Habitats Directive. Among the range of qualifying interests are anadromous (migratory) species including Atlantic Salmon, Sea Lamprey, Twaite and Allis Shad. In addition, Smelt, listed in the Irish Red Data Book for Vertebrates, has significant populations in these waters. These waters are also important migratory routes for juvenile and adult European Eels, a critically endangered species.

Notwithstanding the maintenance of existing tonnage of dredged material, the timing of works and the extension of the area in which elevated suspended solids loads are generated increases the probability that fish will be adversely impacted.

IFI note with concern that the closed period for plough dredging does not extend to the site at Cheek Point, which is among those for which an increase in the dredging area is proposed. Plough dredging generates elevated suspended solids levels in the water column. Elevated suspended solids levels impact adversely on fish respiration, lead to abrasions and infection, or result in the deposition of fines onto spawning areas; impede swimming or 'obstruct' passage, and impair dissolved oxygen.



Iascach Intíre Éireann
Inland Fisheries Ireland

Plough dredging relies on river flow and tidal movements to disperse the plume of material created in the dredging process. This has potential to generate very high SS levels on a continuous basis during the operation. This is occurring at the intersection of all three major catchments entering the estuary.

Migrations of eels occur on the new moon, whereas Salmon migrations tend to coincide with the full moon. Both species' migrations coincide with spring tides when plough dredging occurs at the Cheek Point site. Cheek Point lies at the intersection of all three catchments, and is a critical area for fish migration affecting a sizable portion of the total freshwater area of the country.

IFI therefore request that in the interests of the timing and sensitivity of migratory fish species, that consideration be granted to the extension of the closed period from 1 March to 30 June to this area. Extending the closed period can serve a valuable role in reducing potential adverse impacts to the migrating fish.

IFI also request that consideration be given to the greater use of suction or mechanical dredging relative to plough dredging from which the release of suspended solids is far less controlled.

In the event of any incident with the potential to impact surface waters directly or indirectly, the contractor should notify IFI immediately.

Should you require any clarification on the above please do not hesitate to contact me. Future correspondence including acknowledgements of this submission can be sent to cormac.goulding@fisheriesireland.ie or by post to the address below.

Yours sincerely,

Cormac Goulding
Fisheries Environmental Officer
South-Eastern River Basin District

Donnachadh Byrne
Senior Fisheries Environmental Officer
South-Eastern River Basin District

Oliver McGrath
Fisheries Environmental Officer
South-Eastern River Basin District

Eve O'Sullivan

From: Cormac Goulding <Cormac.Goulding@fisheriesireland.ie>
Sent: Monday 14 March 2022 14:21
To: CorporateSupport.Unit
Cc: Donnachadh Byrne; Oliver McGrath; Michaela Kirrane
Subject: EPA re S0012-04 Port of Waterford Company - Dumping at Sea Permit Application
Attachments: IFI_Submission_PoW_202203.pdf

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Enda,

Please find attached IFI's submission in response to this licence amendment request.

Regards,

Cormac

From: Michaela Kirrane <Michaela.Kirrane@fisheriesireland.ie>
Sent: Tuesday 8 February 2022 08:39
To: Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>; Oliver McGrath <Oliver.McGrath@fisheriesireland.ie>; Cormac Goulding <Cormac.Goulding@fisheriesireland.ie>
Subject: FW: EPA re S0012-04 Port of Waterford Company - Dumping at Sea Permit Application

FYI,

Regards,
Michaela

From: CorporateSupport.Unit [<mailto:CorporateSupport.Unit@decc.gov.ie>]
Sent: 07 February 2022 17:08
To: Michaela Kirrane; Noel McGloin; GSI Planning; GSRO; GSPD; Rosemary Gaul; Jon Field; Dorothy McCauley; Ciaran McManus; Sinead Hart Moran; Deirdre Doran; Michael OConnor
Cc: CorporateSupport.Unit; Planning Advisory
Subject: EPA re S0012-04 Port of Waterford Company - Dumping at Sea Permit Application

*****CYBER SECURITY WARNING***:** This email originated from outside of Inland Fisheries Ireland email system and contains an attachment(s). Do not open attachments from unknown sources.

Good afternoon,
Please see attached correspondence in the above regard from the EPA. Please forward any observations to Corporate Support Unit as soon as possible for return to the EPA.

Regards,
Enda Brady,
Corporate Support Unit.

From: Licensing Staff <licensing@epa.ie>
Sent: Monday 7 February 2022 11:18

To: manager.dau@housing.gov.ie; foreshore@housing.gov.ie; foreshore@agriculture.gov.ie; orlaigh.quinn@dbei.gov.ie; Caroline.Anderson@fisheriesireland.ie; CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>; mso@dttas.ie; elaine.mcgooff@antaisce.org; info@portofwaterford.com
Subject: S0012-04 Port of Waterford Company - Dumping at Sea Permit Application

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Dear Sir or Madam

Re: S0012-04 Dumping at Sea application from Port of Waterford Company for Waterford Harbour

In accordance with Section 5(1)(a) of the Dumping at Sea Act 1996 as amended, we are to inform you of the receipt on 3 February 2022, of documentation relating to a Dumping at Sea Permit application from Port of Waterford Company in relation to Waterford Harbour. This application has been assigned the Reg No S0012-04.

The application and associated correspondence, including the acknowledgements and notifications referred to, are available to view on the Agency's website at [Environmental Protection Agency \(epa.ie\)](http://Environmental Protection Agency (epa.ie))

The Agency will have regard to any comments made in accordance with the Act and will write, in due course, to each person who makes such a comment, to advise them of the Agency's decision on the application.

Please use the register number of the Dumping at Sea Permit application, S0012-04, in any future communication and send by email to licensing@epa.ie.

Please note that there is no requirement for you to acknowledge receipt of this email.

Regards

Environmental Licensing Programme
Office of Environmental Sustainability, Wexford
An Clár um Cheadúnú Comhshaoil
An Oifig um Inmharthanacht Comhshaoil, Loch Garman



053-9160600

licensing@epa.ie

www.epa.ie



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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an



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