

Eve O'Sullivan

Subject: Our Ref: FW.7.23 EPA Ref: S0012-03 Dumping at Sea Technical Amendment Request - Port of Waterford Company

From: OBrien, Grace <Grace.OBrien@agriculture.gov.ie>

Sent: Tuesday 17 May 2022 12:57

To: Licensing Staff <licensing@epa.ie>

Cc: Foreshore <Foreshore@agriculture.gov.ie>

Subject: Our Ref: FW.7.23 EPA Ref: S0012-03 Dumping at Sea Technical Amendment Request - Port of Waterford Company

Our Ref: FW.7.23 Dumping at Sea Technical Amendment Request - Port of Waterford Company
EPA Ref: S0012-03

To Whom It Concerns,

I write in connection with this application for Port of Waterford Company.

Please see below the observations/concerns from BIM.

Please acknowledge safe receipt of this email.

Regards,

Grace O'Brien
Foreshore Section
Department of Agriculture, Food and the Marine
National Seafood Centre, Clogheen,
Clonakilty, Co. Cork,
P85 TX47
Tel: +353 (023) 8859565
Email: grace.obrien@agriculture.gov.ie
www.agriculture.gov.ie

From: Foreshore Licensing <foreshore.licensing@bim.ie>

Sent: Tuesday 17 May 2022 11:19

To: OBrien, Grace <Grace.OBrien@agriculture.gov.ie>

Cc: Foreshore <Foreshore@agriculture.gov.ie>; O'Loan, Brian <Brian.OLoan@bim.ie>; Hickey, John <John.Hickey@bim.ie>; Lawler, Ian <ian.lawler@bim.ie>; O'Donovan, Vera <Vera.ODonovan@bim.ie>; Campbell, Rory <rory.campbell@bim.ie>

Subject: RE: Our Ref: FW.7.23 EPA Ref: S0012-03 Dumping at Sea Technical Amendment Request - Port of Waterford Company

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Dear Grace,

Please see below BIM's comments/observations in regard to application (FW.7.23 EPA Ref: S0012-03) Dumping at Sea Technical Amendment Request – Port of Waterford. This technical amendment request by the Port of Waterford Company is seeking an extension to the areas of their current Dumping at Sea Permit (S0012-03).

It is BIM's view that it is likely that this application would have an impact on both fisheries and aquaculture in the area(s) of the existing dumping at sea permit (S0012-03) and the extension of these areas requested in this technical amendment for the reasons as outlined below:

Fisheries Impacts

With regard to this application, we note that the extension to one of the sites is in connection with a proposed pontoon at Cheekpoint. This project has general community support. The promoters of the pontoon originally applied to the FLAG SE for funding, but the FLAG was not in a position to assist at the time, but they have been successful in obtaining LEADER funding. The FLAG overall is supportive of the project as the strategy of the FLAG SE includes for the enhancement of landing facilities to help develop the tourism potential and provide better landing facilities for fishermen in areas such as the Waterford Estuary.

However, in line with the industry concerns with regard to the effects/impacts of sediment on fisheries within the estuary, we would question the use of ploughing as a technique at this and the other locations in this application, as this appears to just move the sediment with the tidal flow to other areas including the locations of important fisheries. We would recommend that the least impactful method be used such suction dredging with the sediment disposed at the dumpsite (albeit that there are genuine concerns that the dumpsite is too close to the mouth of the estuary with much of the dumped spoil washing back in on incoming tides).

We would also call for monitoring of sediment build up at a number of fishery locations on an ongoing basis in order to compare natural sediment build up with that that occurs during and after dredging and ploughing maintenance operations.

Such locations for monitoring using turbidity sensors etc. should be consulted with the fishermen but should include;

- The whelk beds from Arthurstown to Creadan Head
- Surf clam fishery on the east side near Broomhill south of the Natura site

In general, the fishing industry have a major concern with regard to sediment settlement that they see arising from the overall maintenance by the Waterford Port Authority throughout the estuary including dredging and ploughing.

Examples of this are the reported decrease in the fishable area (due to the increase in sediment over the bed) of the Waterford Estuary surf clam bed, which is a small-scale fishery that has locally led management under S.I. No. 180 of 2010.

Last year BIM staff were contacted by a whelk fisherman who fishes just outside of Duncannon who reported extraordinary deposits of sediment into his whelk pots that he hauled on a daily basis as the image below shows.



Whelk drum filled to the top with sediment after it had being hauled and emptied the previous day.

Other fisheries of concern include cockle beds within the estuary which have not being fished commercially for more than 10 years, however local fishermen are looking to see if a managed fishery can be pursued again. Fishermen in the estuary also have a strong interest in seeing the mussel fishery revitalised but are concerned that the dredging and ploughing campaign is having a detrimental impact on natural settlement and any reseeded mussels onto the beds.

Aquaculture Impacts

Concerns have been expressed to BIM from the oyster industry in Waterford Estuary in recent years over the increase in dredging activities undertaken by the Port of Waterford. We have reviewed the three Dumping at Sea Licences S0012-01, S0012-02 and S0012-03 and all of the technical amendments made to them to date and it is clear that:

- the tonnage of dredge spoil that can be taken out of the Estuary per annum has increased substantially
- the tonnage of dredge spoil that can be dumped within the estuary by plough dredging has increased substantially
- and the number of areas that can be dredged has increased also throughout the estuary. Furthermore, for some dredge areas e.g., Cheekpoint previously closed to dredging periods have been removed as recently as 2021. Thus, plough dredging can occur at Cheekpoint year round.

Last year the oyster producers experienced the clogging of oyster bags by sediment during and after dredging campaigns as the image below shows.



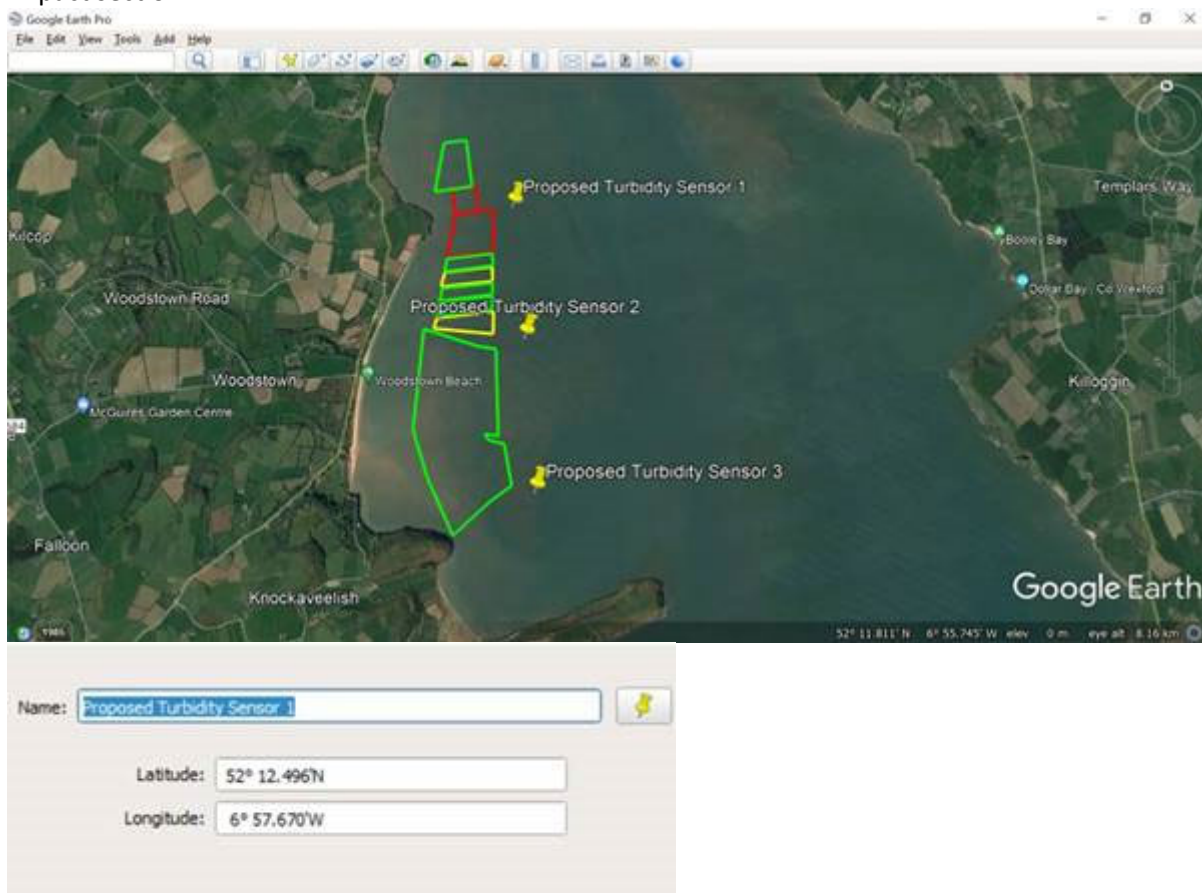
Silt/mud deposited on oyster bags clogging them up during and after dredging activities.

We have raised industry concerns at the South East Regional Operational Committee level run by LAWPRO for the WFD. We believe that increases of suspended solids during periods when the estuary is not experiencing high turbidity levels (naturally) will:

- impact oyster feeding directly (energy expenditure sorting out silt from food)
- impact on primary productivity in the estuary (also in cumulative effects on primary productivity with other discharges into the estuary)
- can impact oyster feeding indirectly through clogging of oyster bag mesh (which can reduce water flow in the bag leading to possible reduced delivery of food)
- can potentially reduce oyster quality (meat content) and increase mortality through reduced oxygen and food flow through the bag increasing stress and disease susceptibility

The oyster producers describe it as ‘slop’ landing in on top of their sites. It has also made access throughout the site more difficult. Although this request for a technical amendment to the present Dumping at Sea Permit (S0012-03) is not asking for an increase in dredge tonnages it is asking for increases in the dredge areas. As indicated in our response at the beginning of the Aquaculture Impact section substantial increases in tonnages were granted in previous licences and technical amendments.

From the perspective of the oyster and mussel farmers in the estuary we would be recommending a year long study taking in three turbidity monitoring stations (every 30 minutes, with data accessible on the web at the three locations shown on the google earth image below (just east of the seaward flank of the oyster licenced sites). The data gathered would help us determine background turbidity levels, turbidity levels during dredging campaigns and turbidity levels post dredging campaigns throughout the year. This would be in addition to the monitoring of sediment build-up at a number of fisheries locations on an on-going basis as we have mentioned in the Fisheries Impact section.



Name: Proposed Turbidity Sensor

Latitude: 52° 11.888'N

Longitude: 6° 57.711'W

Name: Proposed Turbidity Sensor

Latitude: 52° 11.218'N

Longitude: 6° 57.781'W

In response to the overall seafood concerns there needs to be substantial reduction in plough dredging within the estuary and a change to using methods that result in the dredge spoil being contained in the dredger (such as suction dredging) until disposal at the offshore site. There needs to be a comprehensive study on the impact of the maintenance campaign including dredging and ploughing on fisheries and aquaculture in the Waterford Estuary.

Kind regards,

Denise

From: OBrien, Grace <Grace.OBrien@agriculture.gov.ie>

Sent: 25 April 2022 15:05

To: Crowley, Raphael <Raphael.Crowley@agriculture.gov.ie>; DAFM Queries <DAFMQueries@sfpa.ie>; 'francis.xobeirn@marine.ie' <francis.xobeirn@marine.ie>; Foreshore Licensing <foreshore.licensing@bim.ie>

Cc: Foreshore <Foreshore@agriculture.gov.ie>

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EPA Ref: S0012-03

Dear All,

This Department has received a request for comments/observations from the Environmental Protection Agency (EPA) in relation to a dumping at sea permit that previously issued to Port of Waterford Company under the **EPA Ref: S0012-03**.

Please see the link below that will take you to their website where the application can be viewed.

[Environmental Protection Agency \(epa.ie\)](http://epa.ie)

As usual this Department's observations will be confined to aquaculture/ sea fisheries and fisheries harbours.

Please provide your comments directly to myself, quoting our reference **FW.7.23** and kindly copy foreshore@agriculture.gov.ie on all correspondence.

Regards,

Grace O'Brien
Foreshore Section
Department of Agriculture, Food and the Marine
National Seafood Centre
Clonakilty
Co. Cork
P85 TX47
Email: grace.obrien@agriculture.gov.ie

Disclaimer:

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.

Disclaimer:

Department of Agriculture, Food and the Marine

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