



Submission

Submitter:	Mr CorporateSupport Unit
Organisation Name:	Department of Environment, Climate and Communications
Submission Title:	Reply from Inland Fisheries Ireland
Submission Reference No.:	S010369
Submission Received:	08 June 2022

Application

Applicant:	Amazon Data Services Ireland Limited
Reg. No.:	P1184-01

See below for Submission details.

Attachments are displayed on the following page(s).



Date: 08/06/2022

Re: Amazon Data Services Ireland Limited, Application for Industrial Emissions (IE) Licence, Reference EPA043011.

Dear Sir/Madam,

IFI have reviewed the application and associated documentation and make the following observations:

The drainage from site is directed to SDCC public stormwater drain to the northwest of the site along the Baldonnell Road. The SDCC stormwater system discharges to the River Griffeen to the north of the site. The River Griffeen is a tributary of the River Liffey.

This connectivity in the absence of appropriate mitigation measures during the operational phase of the development poses a risk to the receiving aquatic environment.

The current WFD status for the Griffeen River is Moderate which must be returned to Good status by 2027.

Ireland has a legal obligation in accordance with The [EU Water Framework Directive \(2000/60/EC\)](#) requires all Member States to protect and improve water quality in all waters so that we achieve good ecological status by 2015 or, at the latest, by 2027. It was given legal effect in Ireland by the [European Communities \(Water Policy\) Regulations 2003 \(S.I. No. 722 of 2003\)](#).

- IFI are becoming aware of the lack of appropriate maintenance of interceptors, attenuation tanks on developments during the operational phase of developments and would encourage that the appointed site management/maintenance company is required to enter a service maintenance contract with an authorised specialised company with responsibility for the agreed service and maintenance of the on-site drainage and attenuation infra-structure.
- It is essential that the receiving foul and storm water infrastructure has adequate capacity to accept predicted volumes from this development during construction and post construction phases with no negative repercussions for the quality of any receiving waters. It is essential that local infrastructural capacity is available to cope with increased surface and foul water generated by the development to protect the ecological integrity of any receiving aquatic environment.



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Inland Fisheries Ireland**

- All discharges from the site must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

Regards,

Matthew Carroll

Fisheries Environmental Officer
Inland Fisheries Ireland - Dublin

**Iascach Intíre Éireann
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**Iascach Iníre Éireann
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