



### Submission

Submitter:	Mr. Michael McPartland
Submission Title:	Received by Email (Outside CRM)
Submission Reference No.:	S010642
Submission Received:	19 October 2022

### Application

Applicant:	Irish Water
Reg. No.:	D0544-02

See below for Submission details.

Attachments are displayed on the following page(s).

## Eve O'Sullivan

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**From:** Licensing Staff  
**Subject:** Application for a Waste Water Discharge licence by Irish Water at Grenagh, Co.Cork. Reference No: D0544-02.

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**From:** Michael McPartland <[Michael.McPartland@fisheriesireland.ie](mailto:Michael.McPartland@fisheriesireland.ie)>  
**Sent:** Wednesday 19 October 2022 12:09  
**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>  
**Subject:** Application for a Waste Water Discharge licence by Irish Water at Grenagh, Co.Cork. Reference No: D0544-02.

A chara,

Thank you for your recent notification of the above reference application.

The Martin River, the receiving water for effluent from Grenagh WWTP, is a significant salmonid spawning and nursery water. The river has been identified as being "at risk" particularly in its lower reaches. The applicant states "Due to limited background data, and the fact that the current WFD status of the Martin\_010 is Poor, ...the EPA's "notionally clean river concentrations were applied in the WAC calculations ". In the context of a river system under threat IFI fails to see how a 'notionally clean river approach' could be applied when assessing the environmental impact .

IFI would ask the EPA to ensure that current actual background data is applied when calculation of the assimilative capacity relative to legislative requirements is carried out as part of the licence application

Michael Mc Partland  
Senior Fisheries Environmental Officer.

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