

Eve O'Sullivan

Subject: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC
Attachments: Scan_1213071.pdf

From: OBrien, Grace <Grace.OBrien@agriculture.gov.ie>
Sent: Friday 18 November 2022 12:33
To: Licensing Staff <licensing@epa.ie>
Cc: Foreshore <Foreshore@agriculture.gov.ie>
Subject: RE: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC

Our Ref: FW.9.24 Dumping at Sea application from the Department of Agriculture, Food and the Marine (DAFM) for An Daingean FHC
EPA Ref: S0036-01

Dear Sir/Madam,

I refer to your request for comments/observations from this Department with regards a dumping at sea permit for An Daingean FHC.

Please find attached the concerns raised by the Engineering Division of this Department.

Please note, there is a wild pot fishery for shellfish being developed in the area and the SFPA raised the possibility the development may have a negative impact on fishery if conducted during the shrimp fishing season.

Regards,

Grace O'Brien
Foreshore Section
Department of Agriculture, Food and the Marine
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From: Licensing Staff <licensing@epa.ie>
Sent: Thursday 7 July 2022 14:17
To: manager.dau@housing.gov.ie; foreshore@housing.gov.ie; Foreshore <Foreshore@agriculture.gov.ie>; orlaigh.quinn@dbei.gov.ie; Caroline.Anderson@fisheriesireland.ie; CorporateSupport.Unit@DCCAE.gov.ie; mso@dtas.ie; elaine.mcgooff@antaisce.org; DingleHarbour <DingleHarbour@agriculture.gov.ie>
Subject: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC

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Dear Sir or Madam

Re: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC

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 1 July 2022, of documentation relating to a Dumping at Sea Permit application from the Department of Agriculture, Food and the Marine in relation to An Daingean FHC. This application has been assigned the Reg No S0036-01.

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, S0036-01, 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.

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



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Mr. Campbell, Divisional Engineer
Ms O' Brien, Foreshore Section

BJO 23/8/22

RE: FW.9.24 Dumping at Sea application from DAFM for An Daingean FHC EPA ref : S0036-01

Mr Campbell's memo of 8 August 2022 refers. I have viewed the application documents on the EPA website.

The dumping at sea application proposes the dredging of 200000 tonnes of sediment from a proposed marina extension area in An Daingean FHC and disposal of the dredged material at a dumpsite located 1km east of the entrance – locations are shown on map overleaf.

The dredge area is some 7.4 hectares in area, the dump site area is 53 hectares in area ; a split hopper barge is proposed for the disposal operation. The proposed dump site was previously used for disposal of dredge spoil from An Daingean FHC in a 2018 dumping at sea permit.

The newly proposed dredging /dumping at sea operations would take place over 10-15 weeks at some stage in the 3 year period January 2023 – December 2025.

Application documents were compiled by engineering consultants Malachy Walsh and Partners for Engineering Division of DAFM and submitted to the EPA on 01/07/22

My comments on the application under the relevant headings are listed below:

Aquaculture

The nearest licensed aquaculture sites are significant distances away – there is a seaweed culture site (T06/372A) in Ventry Harbour which is 6km to west of proposed dump site and the nearest licensed shellfish growing sites are in Castlemaine Harbour (mussels and oysters) located 20 km to east of proposed dumpsite . See "Map showing nearest aquaculture sites" included in this report which shows relative positions. It is highly unlikely that proposed dredging/dumping operations at An Daingean would have a significant impact on aquaculture due to long separation distance between the activities . Negative impact on aquaculture may be discounted as a potential concern in my opinion.

Sea Fisheries

Sea fishing activity in the inshore water that include the proposed dumpsite and inner Dingle harbour would seem to be mainly crab and lobster potting – see MAP 15 included in this report.

Seabed on dumpsite is of mixed type based on video surveys carried out – west and north parts have exposed bedrock and coarse cobble /gravel material ; south and east of site are mainly rippled sand. The dredge area is soft sediment – muddy sand and sandy muds.

Sediment sample chemical analysis results provided with application seem to indicate that level of toxins/metals in the sediment proposed for dredging are relatively low (2 Pb(lead) values are above lower guidance level). EPA will in any case make their own assessment. If total sediment load were



SCALE
0 0.5 km

MAP 1

to be deposited on the dumpsite without loss it would in theory create an even sediment blanket of some 0.19m depth over the entire 53 hectare site. However loss to the water column and bed dispersion will reduce actual bed thickness change on the dumpsite - Hydrodynamic modelling output for the dumping operation (see copy attached of Figure 8 from Numerical Modelling report of consultant) shows isolated peaks in excess of 0.14m height increase within the dumpsite area at end of dumping operations.

It may be anticipated that potting activity/success on and close to the dumpsite area will be disrupted for a period during and for some months after the dumping operation -but that impact would be expected to reduce with time. Relative to the total potting fishery areas within Dingle Bay the dumpsite area is relatively small.

SFPA advice on potential for wild fisheries impact in the area may be helpful. Given that a previous dumping at sea operation has taken place at the same dump site a few years ago, it could be expected that a repeat operation is unlikely to have dissimilar level of impact

Passage of wild salmonids to the Milltown River could potentially be impeded by dredging operations proposed to take place over the area south of existing marina breakwater; this is an issue that IFI may comment on further and could affect timing of works.

Fisheries Harbours

The proposed dredge area is with the Fishery Harbour Centre area of An Daingean. The proposed development (marina area expansion) will be within a working fishing harbour area (landings more than 10000 tonnes in 2021) . The dredge site is offset from the approach channel to the harbour and the dumping site is to the east of the outer harbour entranceway. Provided appropriate safety precautions are applied by contractors involved the proposed dredging and disposal operations should not directly obstruct vessel traffic at the harbour be it fishing boat or users of the existing marina facilities – safety precaution would be needed to minimise potential hazard to mariners in the harbour area and at the dumpsite during the works period of a few months.

It may be anticipated that the dredging works ought not have a significant impact on normal ongoing activities at the harbour. Public access to certain areas may be restricted for a time. In terms of the harbour itself the dumping at sea operation is related to future marina expansion which will ultimately increase marine leisure berthage available in the area and ensure continued separation between fishing and marine leisure activities within the harbour area.

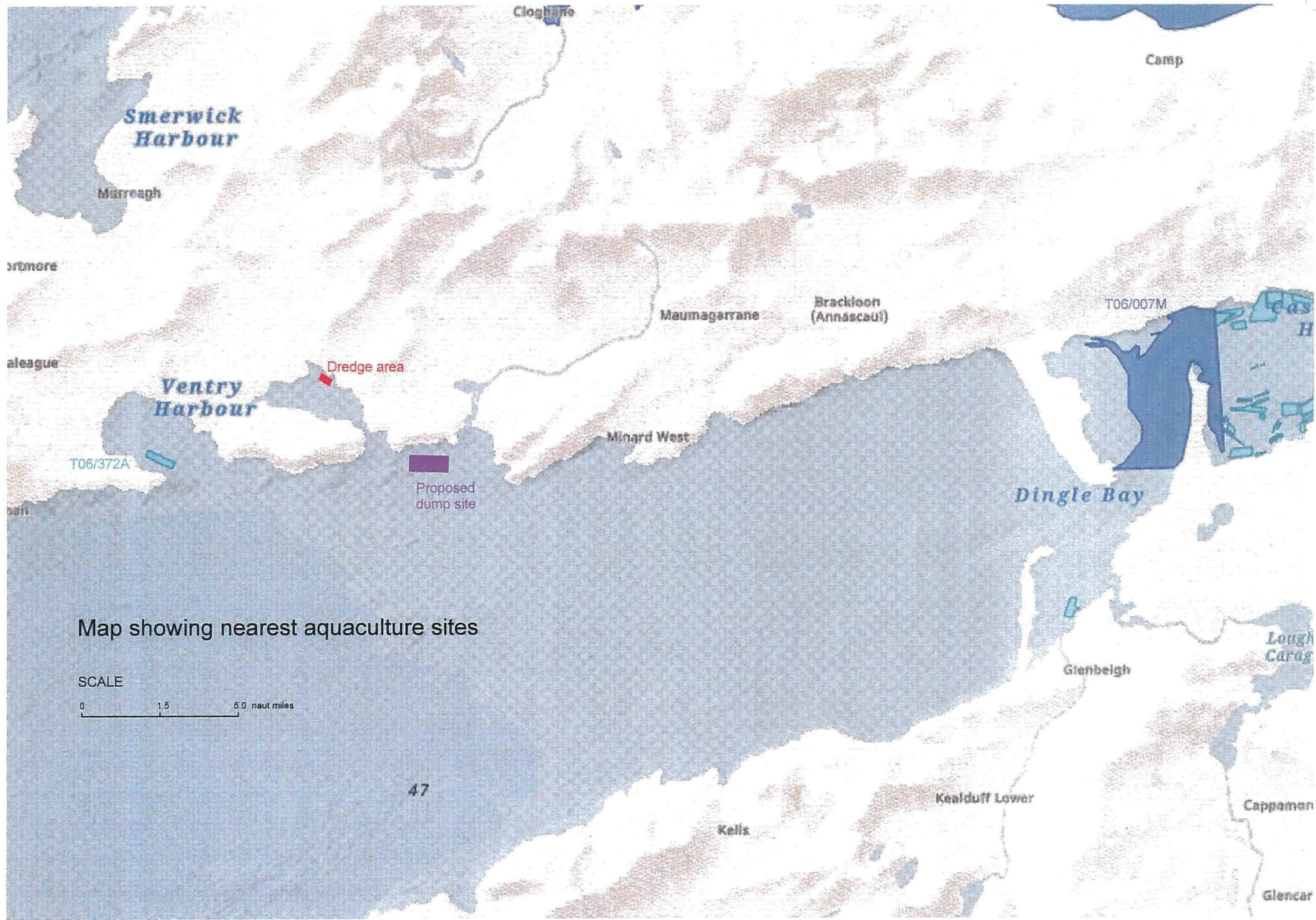
Paul O'Sullivan

Paul O'Sullivan

22/8/22

Further note (for information):

There is a discrepancy in Latitude Longitude coordinates for loading area in the application form. There are differences in the exact dumpsite location as mapped in certain application supporting documents. I have passed this information on to Engineering Division office Tralee.

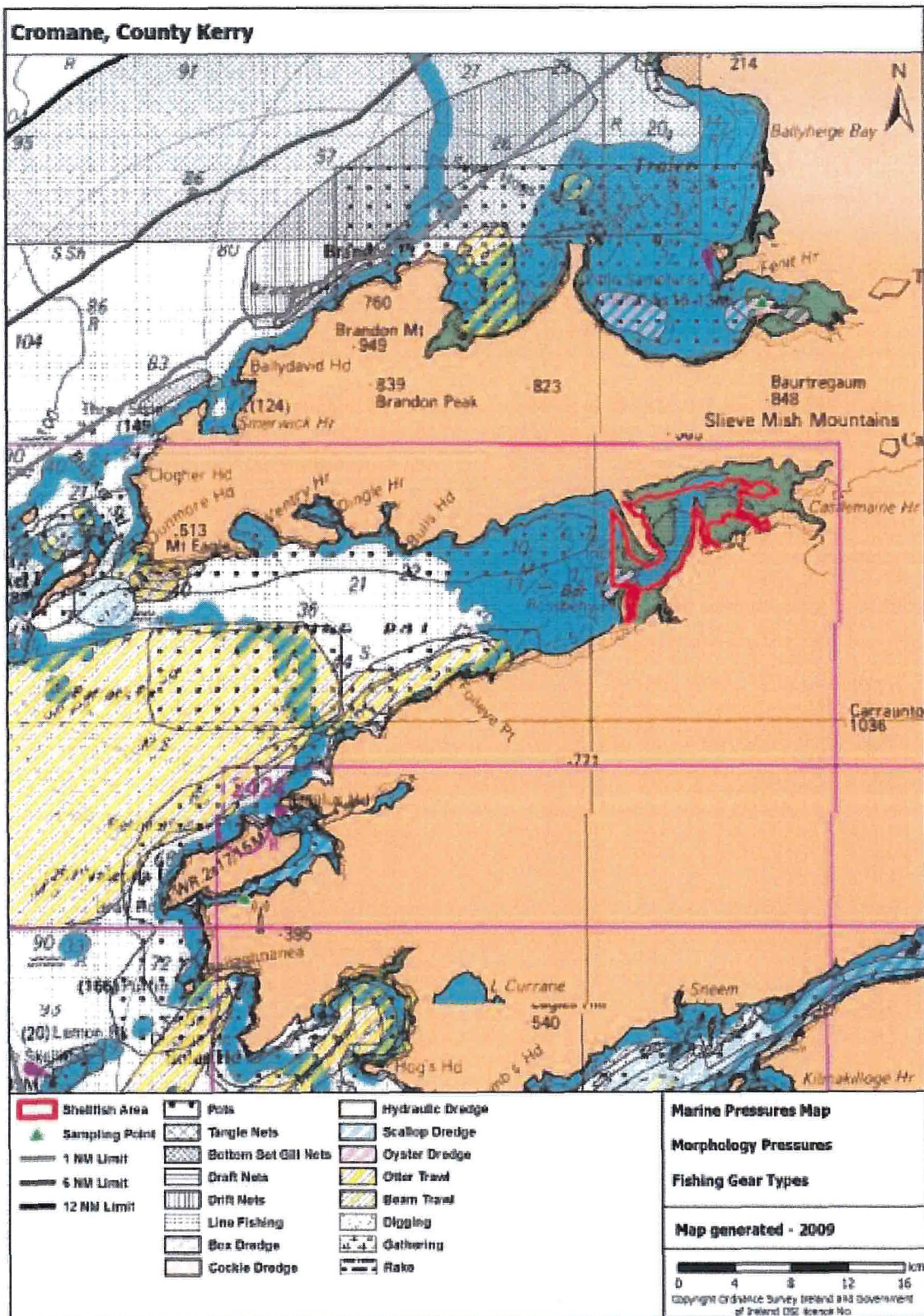


Map showing nearest aquaculture sites

SCALE
0 1.5 5.0 naut miles

47

MAP 15 - Fishing gear activity



Source: Cromane Shellfish Area Final Characterisation Report number VII DHLGH

2.4.2 Bed Thickness Change

The build-up of bed thickness at the end of the dumping operations is shown in Figure 8.

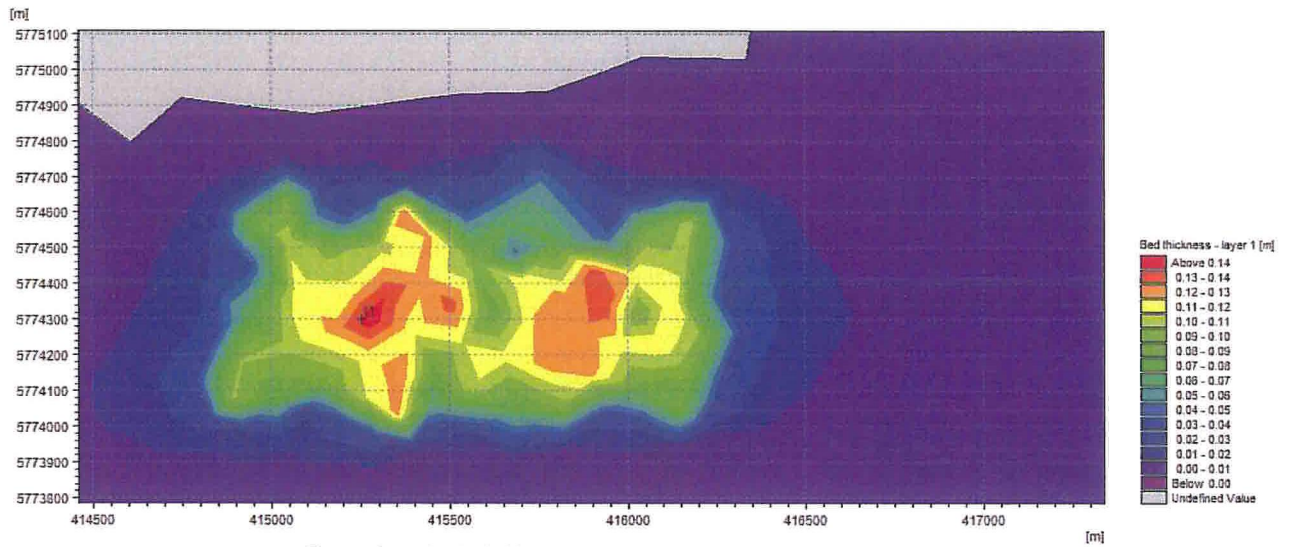


Figure 8 Dumpsite: Bed Thickness Change at end of dumping operations (day 70)

OSullivan, Paul

From: Campbell, John
Sent: Monday 8 August 2022 12:57
To: OSullivan, Paul
Subject: FW: Our Ref: FW.9.24 EPA Ref: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC

Hi Paul,
Could you report on this please. It relates to and EPA Dumping@Sea application for a DAFM project in Dingle.
Regards
John

From: Crowley, Raphael <Raphael.Crowley@agriculture.gov.ie>
Sent: Thursday 14 July 2022 10:54
To: Campbell, John <John.Campbell@agriculture.gov.ie>
Cc: Clancy, Noel <Noel.Clancy@agriculture.gov.ie>
Subject: FW: Our Ref: FW.9.24 EPA Ref: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC

John
For your attention please as discussed.
Regards
Raphael

Raphael Crowley
Chartered Engineer - Marine Engineering Division
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine
Pointe Uí Rinn, Cathair Uí Mhóráin, Trá Lí, Co. Chiarraí, V92 X2TK
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From: OBrien, Grace <Grace.OBrien@agriculture.gov.ie>
Sent: 07 July 2022 15:12
To: Crowley, Raphael <Raphael.Crowley@agriculture.gov.ie>; DAFM Queries <DAFMQueries@sfpa.ie>; 'francis.xobeirn@marine.ie' <francis.xobeirn@marine.ie>; 'foreshore.licensing@bim.ie' <foreshore.licensing@bim.ie>
Cc: Phair, Ann <Ann.Phair@sfpa.ie>; Foreshore <Foreshore@agriculture.gov.ie>
Subject: Our Ref: FW.9.24 EPA Ref: S0036-01 Dumping at Sea application from the Department of Agriculture, Food and the Marine for An Daingean FHC

Our Ref: FW.9.24 Dumping at Sea application from the Department of Agriculture, Food and the Marine (DAFM) for An Daingean FHC
EPA Ref: S0036-01

Dear All,

An application has been received from the Environmental Protection Agency, for the Department's observations/comments for a dumping at sea permit for An Daingean FHC – that is the responsibility of this Department.

Please see the link below where the application may 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 observations directly to myself quoting our reference **FW.9.24** and kindly copy foreshore@agriculture.gov.ie on all correspondence.

Regards,

Grace O'Brien
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