## **Eve O'Sullivan**

**Subject:** Reg No S0005-03 Dumping at Sea Permit Application from Department of Defence

Attachments: 23-25.doc

From: Michael McPartland < Michael. McPartland@fisheriesireland.ie >

Sent: Friday 11 August 2023 13:39
To: Licensing Staff < licensing@epa.ie>

Subject: Reg No S0005-03 Dumping at Sea Permit Application from Department of Defence

A chara

Please find attached submission

Michael Mc Partland Senior Fisheries Environmental Officer.

lascach Intíre Éireann Inland Fisheries Ireland

Tel + 353 (0)26 412 21/2 Fax + 353 (0)26 412 23

Email <u>michael.mcpartland@fisheriesireland.ie</u>

Web www.fisheriesireland.ie

Sunnyside House, Macroom, Co. Cork, Ireland. P12 X602

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Help Protect Ireland's Inland Fisheries

## Michael McPartland Senior Fisheries Environmental Officer

Michael.McPartland@fisheriesireland.ie • 🌥 +353 (0)26 41222 • 🊳 www.fisheriesireland.ie • 🏚 P12 X602



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Environmental Protection Agency Johnstown Castle Estate Wexford

11 August 2023

RE: Reg No. S0005-03 Dumping at Sea Permit Application from Department of Defence

A Chara,

I refer to the above-mentioned application.

While IFI appreciates the significance of the proposed works, there is also a statutory obligation on IFI to protect and conserve fisheries. It is in this context that we make the following comments on the proposal.

- a) The concentration levels licenced for any parameter should not be at variance with those set out in the Department's "Guidelines for the assessment of dredge material for disposal in Irish Waters" document.
- b) Dumping should avoid herring spawning times in November and February.
- c) Effective control measures are required to ensure there is no water quality impact outside the dredge zone to the greater Cork Harbour area.
- d) The effectiveness of these control measures should be ensued by daily monitoring during the period of dredging activity.
- e) An ecological assessment and species quantification of the dumpsite area should occur pre and post dumping to permit impact assessment.

Yours sincerely	
Michael Mc Partland.	
Environmental Officer.	