

**Eve O'Sullivan**

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**Subject:** Submission on dredging at Aughinish Alumina  
**Attachments:** Adobe Scan 22 Dec 2023.pdf

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**From:** Pat geoghegan [REDACTED]  
**Sent:** Friday 22 December 2023 08:40  
**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>  
**Subject:** Submission on dredging at Aughinish Alumina

Dear sirs

Please find attached the Cappagh Farmers Support Group submission to the application for dumping at sea by Aughinish Alumina S0026-02

Regards  
Pat Geoghegan

# CAPPAGH FARMERS SUPPORT GROUP

[REDACTED]

[REDACTED]

[REDACTED]

21-12-2023

Environmental Licensing Programme  
Office of the Climate Change Licensing and Resource Use  
Environmental Protection Agency,  
PO Box 3000  
Johnstown Castle Estate,  
Co. Wexford

**S0026-02**

Dear Sirs

Our group wish to make a submission to the application for dumping at Sea by Aughinish Alumina on the following grounds.

- 1- The failure to correctly describe the material been dredged at the locations outlined in their application.
- 2- The failure to have this material which contain hazardous/toxic material removed to the existing red mud ponds on the Aughinish site than to a dumpsite northwest of foynes.
- 3- Our group objects totally to the EPA in dealing with this application for dredging at Aughinish and should remove themselves immediately from it.
- 4- How samples were taken and by who at the locations outlined in this application.

## **The Failure to correctly describe the material been dredged in their application.**

The EPA description of the material been dredged is as follows-

### **"The dredging of clean sediment from four sites around the AAL jetty"**

The Cappagh Farmers Support Group has raised this in previous submission on an application to dredging lodged by Aughiinish Alumina, where Aughinish has continued to mask what exactly is in the material at these locations using the words clean sediment. We are at a loss as to why the EPA would think it's a clean sediment like they did back in 2016.

Since Aughinish went into production in 1983 and later when the EPA granted Aughinish an IPC licence in 1998 the left-over spillages from loading of Alumina and unloading of Bauxite has been pushed off the jetty into the water by a bob cat or other vehicle and lays on the bed

at the jetty and mixed with this clean sediment that suddenly becomes the main and only material that exists down there according to Aughinish which is untrue.

Even if this polluting process of dumping the left over into the water ceased, the picture at the jetty of where the bauxite is loaded in the application by Aughinish shows another aspect of this hazardous/toxic waste coming from above and into the water. Bauxite contains elements of radioactive material, and many other hazardous/toxic elements.

If one was to imagine the following, the bauxite ship arrives at the jetty, the hatches are opened, and the grab is lowered down and grabs the bauxite. In bringing up the bauxite in the grab the loose bauxite spills from the grab, where it becomes air born with the slightest wind on that day carrying it from the ship into the water. If Aughinish imports approx. 4 million tonnes of bauxite per year, the percentage of spillages into the water at the Jetty is huge. Local people have seen the Bauxite blowing in the wind on to waters when been unloaded.

Aughinish are the instigators of their own build up under the water at the jetty, but they will not own up to what's down there in their application as they are protected by the EPA to do as they please. Once they can keep bauxite material which contain hazardous/toxic elements from their application, it then gives the impression that its safe material to dredge and drag wherever they like.

Aughinish have already dredged from 2016 onwards, where our groups submission was totally ignored to facilitate Aughinish again but not the environment. That dredging caused huge contamination to the surface water that Bivalves, Mussels, Scallops, Oysters, Cockles etc in the vicinity.

It will affect fish and the whole eco system down there. It will make an already vulnerable situation even worse caused by Aughinish since they went into production. Not alone that, this company will now create another toxic dump over in the Northwest of Foynes with their hazardous/toxic waste.

It has already had a huge negative impact within the SAC from the 2016 dredging which continued at different intervals over an eight-year period dragging this hazardous/toxic waste all over the place for it to disperse and washed away in the tide. It has the potential to make its way down to Beale and Bally bunion in Kerry, not to mention what this same proposed dredging will have all over again from this application.

The devise used for loading Alumina on to the ships is called an elephant trunk that pumps the alumina into the ship once the hatches have been opened. Again, members of the public have reported on numerous occasions over the years the alumina blowing in the wind. This happens as the Alumina is very light in nature contains heavy metals and any wind at all carries a percentage of it from the ship into the water.

**The failure to have this material which contain Hazardous/toxic material removed to the existing mud ponds on the Aughinish site than to a dumpsite northwest of Foynes.**

Our group already raised this issue in our previous submission in 2016, that this material at all four locations should be removed to the existing mud ponds as its contaminated with bauxite and Alumina that contain hazardous/toxic material. Aughinish has no problem



whatsoever in having this material brought up, like they do for dredging next to the jetty, placed within lorries that are sealed and covered to stop leakage and transported directly to their own toxic site at the Mud Ponds, instead they are allowed to contaminate, and damage an SAC, in dumping it away from their plant. Our proposal would keep the contamination to a minimum and within their own plant. Dredging is the cheapest way for this company to get rid of it.

They transport another dangerous material called salt Cake from their plant to the Mud Ponds and the EPA facilitates that for them.

It's a case not in our backyard, we caused it but let others have it now.

**Our Group objects totally to the EPA in dealing with this application for dredging and should remove themselves immediately from it.**

Our group has seen for the past two decades or more how the EPA has facilitated Aughinish using a legal held licence given to them by the EPA on behalf of the State, to destroy our environmental in every way possible through emissions to air and water and its no different here.

Our group is aware of conversations between the group Rescue the River Shannon and the EPA on the issue of what was been dumped by Aughinish at the jetty. The EPA are on record that there was no evidence of bauxite down there whatsoever, they never even sent anyone including a diver down there to see for themselves because they knew what they would find.

The 2016 application for dredging was granted. It is also alleged that once the dredging started Aughinish had to take samples of the material been dredged at the jetty. The machine carrying out the dredging had a huge bucket in bring up what was described as silt but contained within this bucket was over 1/3 of bauxite material that was openly seen by individual's down there and later by others which Aughinish and the EPA had denied ever existed. Our group believes there may be more evidence to support this.

It also transpired that samples were been taken from this bucket that contained this material to be analysed which everyone taught would be independent of Aughinish. It is alleged that these samples may have gone to Aughinish own lab to be analysed and results produced for same.

What instructions did the EPA give to Aughinish in relation to taking samples from this bucket or did the EPA personally take samples themselves and what was tested for in their samples independent of Aughinish Alumina. Were the EPA there to visually inspect this bucket of silt and bauxite when it came up? No clean sediment whatsoever here. This was the trent for all the days been dredged, bauxite every day.

It is also alleged that Aughinish took water samples approx. ½ mile away from the Jetty when the dredging was taking place, that seems along distance away from the contaminated source to find anything linking bauxite in the dredging.

The EPA are quoted in a newspaper that they don't know what is contained in the Mud Pond, that they have licenced since 1998. 450 Acres containing approx. 70 million tonnes of Hazardous/toxic material, with 150 acres never lined seeping into the Shannon since 1983

and blowing in the wind on to our farms effecting human health with its particles and they don't want to know what it contains. The same seem to be applied here with what is on the bed at Jetty.

**How samples were taken and by who at the locations outlined in this application**

Samples were tested from the locations at the jetty with results enclosed. Our group have questions in relation to

- 1- Were the samples taken personally by this company at the locations outlined in this application from the Aughinish plant?
- 2- How were these samples taken were there core samples taken or just from the top?
- 3- Did they visually view what material was on the bed at all four locations?
- 3- Who provided a list of chemicals/Heavy metals etc to be tested for
- 4- Were the samples taken by Aughinish themselves and sent over to this lab for testing?
- 5- Our group has only seen some heavy metal results in this application that may indicate bauxite down there, but the results seems very low for some reason. Clearly no full list of elements shown in the application that covers bauxite and Alumina.

The Cappagh Farmers Support Group have outlined our submission above and we are requesting that the EPA remove themselves from this process, contact the Minister for Environment and have an independent expert to deal with such a serious issue of dredging at the Aughinish Plant.

Yours Faithfully



Pat Geoghegan

Spokesperson for CFSG