

Eve O'Sullivan

From: Bridget Ginnity [REDACTED]
Sent: Thursday 15 February 2024 15:59
To: Licensing Staff
Subject: Dumping at Sea Permit Application by Aughinish Alumina Ltd. Ref. S0026-02.

Re: Submission Re. the Dumping at Sea Permit Application by Aughinish Alumina Ltd. Ref. S0026-02.

Dear Sir or Madam,

I wish to make a submission in relation to the Dumping at Sea Permit Application, (EPA Ref No. S0026-02) by Aughinish Alumina Ltd., to dump in the Shannon Estuary.

I am concerned that insufficient evidence was presented by the applicant that the sediment is not likely to be contaminated from decades of activity. Consequently, disturbance of potentially contaminated sediment would cause release of substances harmful to the environment, some of which are listed as priority substances listed in Annex 1 of Directive 2008/105/EC. Emissions, discharges and losses of these substances should be ceased or phased out and permitting their potential release is contrary to the aims of this directive.

I am also concerned that the volume of the material which would be disturbed is large, at almost 670,000 tonnes. This would be dumped on top of what should be the protected habitats of the River Shannon and River Fergus Estuaries SPA and Lower Shannon Estuary SAC.

Both dredging and dumping is likely to lead to loss of habitat and wildlife in the surrounding areas. These risks outweigh the commercial advantage to Rusal in extending their jetty capacity. For this reason, I submit that the requested licence should not be awarded.

Yours sincerely

Bridget Ginnity
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Bridget