

Eve O'Sullivan

From: Melina Sharp [REDACTED]
Sent: Friday 16 February 2024 13:52
To: Licensing Staff
Subject: Aughinish Alumina Ltd. application for dredging and dumping at sea license, application ref. S0026-02
Attachments: Dumping at Sea licence 2023_Feb Submission_16th Feb 2024.pdf

Dear Sir/ Madam,

Please find attached submission regarding the Aughinish Alumina Ltd. application for dredging and dumping at sea license, application ref. S0026-02 as advertised on Wed 17th January 2024 in the Irish Times.

Sincerely,
Melina Sharp and Michael Eversen.

ENVIRONMENTAL PROTECTION AGENCY
PO BOX 3000
JOHNSTOWN CASTLE ESTATE
WEXFORD
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Y35 W821

16th February 2024

**Re: Second Submission - EPA Reg No S0026-02 Dumping at Sea Permit Application by
Aughinish Alumina Ltd.**

Dear Sir or Madam,

In addition to our previous submission, dated 22nd December 2023, we hereby make these further points in the relation to EPA Reg No S0026-02 Dumping at Sea Permit Application by Aughinish Alumina Ltd. in the Shannon Estuary.

For the following reasons, we believe that the dredging and Dumping at Sea license should not be given:

Public Consultation

We continue to contest that insufficient notification to the local communities has been carried out. In our opinion a local paper for County Clare, the Clare Echo or the Clare Champion, should have been used to reach a large local population. This should be in addition to the notice in the national paper, necessary due to the extent of impacts of proposed (cumulative) activities on water, wildlife and coastline of Ireland.

Sediment Sampling

In our opinion not enough samples were taken of the sediment. Only multiple samples for each site could result in a representative sample for each of the areas that are proposed to be dredged. 668,454 tonnes, from AA Screening Report, Table 4.2 and 4.3, is a substantial amount of waste to be sampled using only 4 samples for the chemistry analysis.

This is in addition to previous concerns raised in our submission on 22nd December 2023, which included the sampling methodology, core or surface sampling and the classification of 'clean' for the sediment, which contains a substantial list of chemicals and heavy metals as shown in the chemical analysis.

It is also noted that no sample was taken or test for radiation levels at Site A, at the jetty. As mentioned in the previous submission, it is here that we believe much bauxite and alumina is likely to have ended up on the sea floor.

The act of dredging and proposed ploughing of this likely contaminated sediment will disturb any wildlife that is still surviving around the AAL complex. We know from Dr. Harinder of the Malaysian Society of Marine Sciences and a marine expert at the Malaysia National Oceanographic Data Centre that bauxite (spillage) 'affects all forms of life, from planktons to top carnivores in the area, even the marine mammals.' He continues that 'these sediments will clog the gills of the fish, and the breathing systems of the clams. That is when all the marine life will start dying and it will be a dead zone.'¹

The proposed Dumping at Sea in this case will cause an enlargement of the contaminated area leading to further loss of habitat and wildlife in the surrounding areas.

¹ <https://www.straitstimes.com/asia/se-asia/pahang-coast-contaminated-by-bauxite-doomed-for-three-years-says-scientist>

Conclusion

In our opinion the contaminated dredged sediment cannot be dumped at sea of the reasons listed above and needs to be brought to land and contained and monitored appropriately to avoid further damage to aquatic life.

Yours Sincerely,

Mélina Sharp & Michael Eversen