

From: [REDACTED]
To: [Licensing Staff](#)
Subject: S0012-05 Port of Waterford Dredge Spoils Dumping
Date: Tuesday 26 March 2024 00:28:01

Dear Sir/Madam,

In relation to the Port of Waterford application to extend the current Waterford Estuary dredge dumping license, I make the following submission for your perusal:

NASA satellite photography taken some years ago clearly shows the large accumulation of dumped dredge spoils, in mound form, at the current dumping site.

This accumulation amply demonstrates that

- Dispersal of the spoils is far from optimum with negative consequences for the ecosystem where fertile crustacean and fish spawning grounds are negatively impacted.
- Dumped spoils in all and any tidal condition, so close to the harbour entrance, is self-defeating as an flooding tide will undoubtable carry a portion right back into the Estuary.
- An empirical analysis / a visual examination of the largest Sand Coral Reef in Europe, stretching from Duncannon to the Hook, clearly shows the devastating impact of the fine silt of the dumped dredge spoils smothering the live coral, with dead patches clearly evident at low tides.
- The prevailing tidal currents are impacted by the extending geomorphology of the underwater Hook rock formation thus creating eddies to frustrate better dispersal.
- The current dump site is an anachronistic left-over from the first world war [WW1] when the new dredger at that time [ss Portlairge] was barred from voyaging further afield due to the activities of German U-Boats in the area. [note: ss Hornby and ss Connigbeg loses of this era]. The location has never changed since.
- With the upcoming demarcation of a DMAPS at this location, a dumping site of this nature would negatively impact the spirit and the practical aspirations of such a Marine Protected Area.
- Other Irish Port Companies must dump their dredge spoils much further out from the baseline. Cork Port Company is mandated to dump its spoils at least 4 km from shore, which makes much more sense.
- The prevailing currents East - West and West-East coupled with a flat bathymetric structure, extending out to our full EEZ lines, makes a 5km from baselines dump zone a far more effective dredge dumping location.
- The recent licensing permit allowing dredging to escalate to a full yearly endeavour, particularly at Cheekpoint, appears to have made, inter alia, devastating impacts on the ecology of the Waterford Estuary with fish and crustacean extinctions accelerated, anecdotally reported. This extension exacerbates the many problems, as outlined above, associated with the current dumping location.
- With rail services now connecting Limerick to Waterford Port, the most dredged Estuary in Ireland [Waterford], solely undertaken to accommodate Panama Max and Suez Max ships, is unnecessary for the importation of minimal amounts animal feed and molasses, mostly unloaded beforehand at Foynes and Cork Ports.

I trust you will give these points your full consideration.

Thank you.

With Kind regards,

Cllr. Jody Power, CEng CMarEng MMA MBA FIMarEST FIEI.

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