


From: [Power, Thomas](#)
To: [Licensing Staff](#)
Cc: [Foreshore](#)
Subject: Reg No S0012-05 Dumping at Sea Permit Application from Port of Waterford Company
Date: Wednesday 17 April 2024 12:41:52
Attachments: [image001.png](#)
[BIM observations Reg No S0012-05 Dumping at Sea Permit 04.2024.docx](#)

Please see attached observations from BIM in relation to the application from the Port of Waterford.

Any additional comments sent to this office, will be forwarded under separate cover.

Regards

Tommy Power

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| <p>Thomas Power Higher Executive Officer Aquaculture and Foreshore Management Division</p> <hr/> <p>Department of Agriculture, Food and the Marine National Seafood Centre, Clonakilty, Co. Cork, P85 TX47 Ionad Náisiúnta Bia Mara, Cloich na Coillte, Co. Chorcaí www.agriculture.gov.ie Email: Thomas.Power@agriculture.gov.ie Tel: +353 23 8836264 (Direct Dial) Tel: +353 23 8859500 (Switchboard)</p> |  <p>An Roinn Talmhaíochta, Bia agus Mara Department of Agriculture, Food and the Marine</p> |
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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

BIM observations on Reg No S0012-05 Dumping at Sea Permit Application from Port of Waterford Company Port of Waterford Company for a Dumping at Sea Permit at Waterford Harbour

Please see below BIM's comments/observations regarding the application Reg No S0012-05 Dumping at Sea Permit Application from Port of Waterford Company

It is BIM's view that it likely that this application would have an impact on both fisheries and aquaculture within Waterford Harbour. Recommendations are made for collection of data that would inform mitigation measures.

Fisheries Impacts

Industry have grave concerns with regard to the effects/impacts of sediment on fisheries within the estuary, and would question the use of ploughing as a technique at this and the other locations in this application, as this appears to just move the sediment with the tidal flow to other areas including the locations of important fisheries. The following observations are noted:

A less impactful dredging method could be used as an alternative to plough dredging such as suction dredging with the sediment disposed at the dumpsite.

Require monitoring of sediment build up on an ongoing basis at a number of fishery locations in order to compare natural sediment build up with that which occurs during and after plough dredging maintenance operations. Such locations for monitoring using turbidity sensors etc. should be agreed in consultation with the fishermen but *inter alia* should include the whelk beds from Arthurstown to Creadan Head; Surf clam fishery on the east side near Broomhill south of the Natura site. In general, the fishing industry have a major concern regarding sediment settlement that they see arising from the overall maintenance by the Waterford Port Authority throughout the estuary including dredging and ploughing. Examples of this are the reported decrease in the fishable area (due to the increase in sediment over the bed) of the Waterford Estuary surf clam bed, which is a small-scale fishery that has locally led management under S.I. No. 180 of 2010.

Extraordinarily heavy deposits of sediment were observed in whelk pots just outside of Duncannon. The photograph below shows whelk pot taken during a period of dredging/ploughing in the estuary. The image was taken was taken after the pots were hauled the day before so after a 24-hour soak.

Whelk pot outside Duncannon silted up post dredging.



Other fisheries of concern include cockle beds within the estuary which have not being fished commercially for more than 10 years, however local fishermen are looking to see if a managed fishery can be pursued again. Fishermen in the estuary also have a strong interest in seeing the mussel fishery revitalised but are concerned that the dredging and ploughing campaign is having a detrimental impact on natural settlement and any reseeded mussels onto the beds.

Aquaculture Impacts

Concerns have been expressed to BIM from the oyster industry in Waterford Estuary in recent years over the increase in dredging activities undertaken by the Port of Waterford. We have reviewed the three Dumping at Sea Licences S0012-01, S0012-02 and S0012-03, and the application S00012-04 and all of the technical amendments made to them and it is clear that: the tonnage of dredge spoil that can be taken out of the Estuary per annum has increased substantially, the tonnage of dredge spoil that can be dumped within the estuary by plough dredging has increased substantially and the number of areas that can be dredged has increased also throughout the estuary. Furthermore, for some dredge areas e.g. Cheekpoint previously closed to dredging periods have been removed as recently as 2021. Thus plough dredging can occur at Cheekpoint year round. Oyster producers experienced the clogging of oyster bags by sediment during and after dredging campaigns. Concerns have been raised at the South East Regional Operational Committee level run by LAWPRO for the WFD. Increase of suspended solids during periods when the estuary is not experiencing high turbidity levels (naturally) will:

- impact oyster feeding directly (energy expenditure sorting out silt from food)
- impact on primary productivity in the estuary
- can impact oyster feeding indirectly through clogging of oyster bag mesh (which can reduce water flow in the bag leading to possible reduced delivery of food. See image below) which can potentially reduce oyster quality (meat content) and increase mortality through reduced oxygen and food flow through the bag increasing stress and disease susceptibility

Sediment on Oyster bags

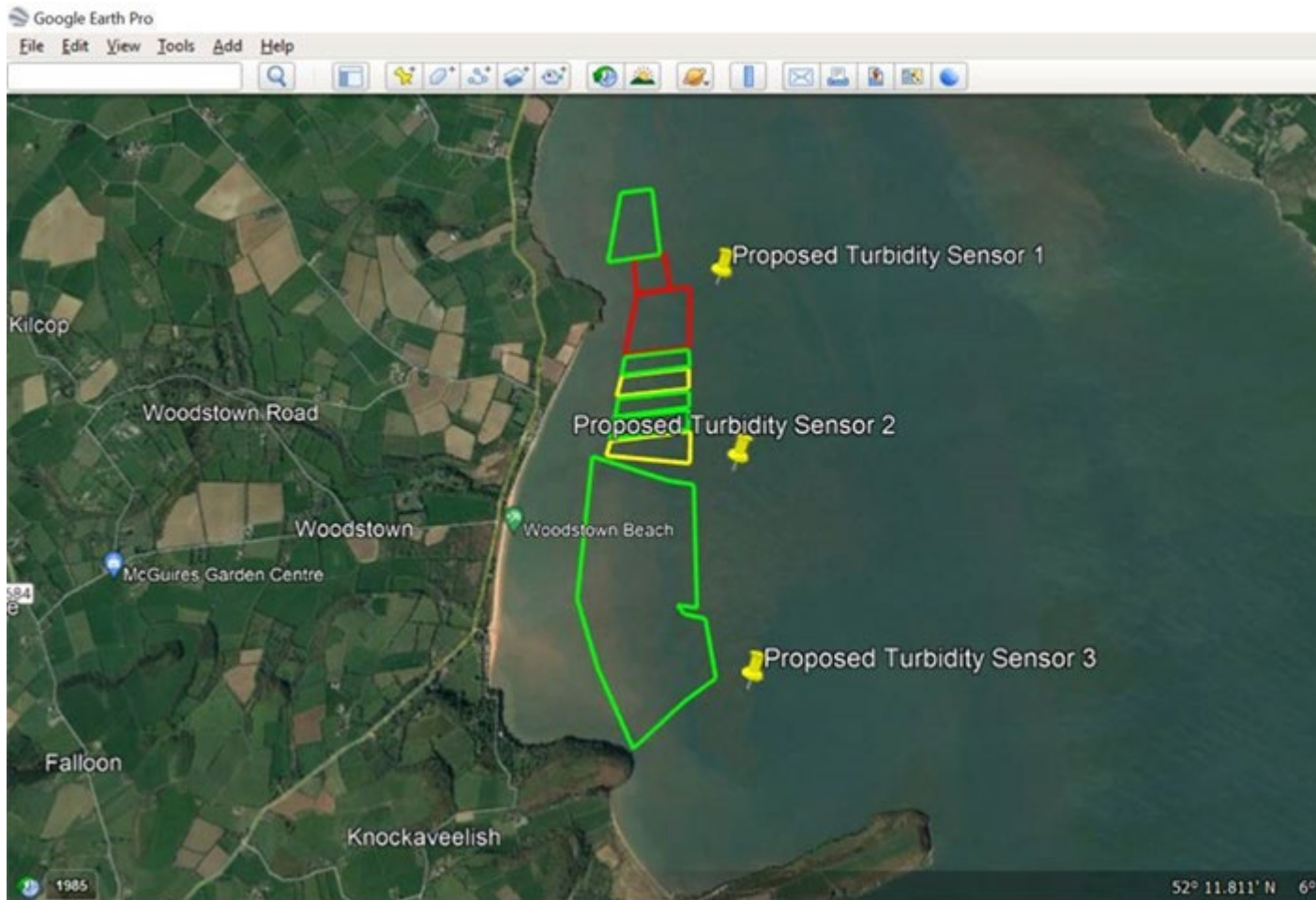


It is noted that the ABPMER report is 2017 and confined to the upper reaches of the Estuary while the DEFT report is 2000 prior to subsequent increases in dredging activity under sequent licenses/ amendments. The AquaFact report on impact on Aquaculture did not bring any new or current bay data therefore does not address the concerns already outlined in previous submissions i.e. bay scale year-long turbidity monitoring at the recommended locations and frequency.

The oyster producers describe the sedimentation as s 'slop' landing in on top of their sites. It has also made access throughout the sites more difficult. Although the application for Dumping at Sea Licence S0012-05 is not asking for an increase in dredge tonnages it is asking for marginal increases in the dredge areas. As indicated in our response at the beginning the substantial increases in tonnages were granted in previous licences and technical amendments.

From the perspective of the oyster and mussel production in the estuary a year-long study taking in three turbidity monitoring stations (every 30 minutes, with data accessible on the web at the three locations shown on the google earth image below (just east of the seaward flank of the oyster licenced sites). The data gathered will determine background turbidity levels, turbidity levels during dredging campaigns and critically turbidity levels post dredging campaigns throughout the year. This would be in addition to the monitoring of sediment build-up at a number of fisheries locations on an on-going basis as we have mentioned in the Fisheries Impact section.

Proposed Location of monitoring points:



Proposed Coordinates for Turbidity sensors 1, 2, 3 to collect hard data on impact on Aquaculture:

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| Name: | <input type="text" value="Proposed Turbidity Sensor 1"/> | |
| Latitude: | <input type="text" value="52° 12.496'N"/> | |
| Longitude: | <input type="text" value="6° 57.670'W"/> | |

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|------------|--|--|
| Name: | <input type="text" value="Proposed Turbidity Sensor 2"/> | |
| Latitude: | <input type="text" value="52° 11.888'N"/> | |
| Longitude: | <input type="text" value="6° 57.711'W"/> | |

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|------------|--|--|
| Name: | <input type="text" value="Proposed Turbidity Sensor 3"/> | |
| Latitude: | <input type="text" value="52° 11.218'N"/> | |
| Longitude: | <input type="text" value="6° 57.781'W"/> | |

In response to the overall seafood concerns there needs to be a comprehensive field study to collect hard data on the impact of the maintenance campaign including dredging, bed levelling and ploughing on fisheries and aquaculture in the Waterford Estuary.