

**From:** [Licensing Staff](#)  
**To:** [Eve O'Sullivan](#)  
**Subject:** FW: S0012-05 Dumping at Sea Permit Application from Port of Waterford Company  
**Date:** Wednesday 22 May 2024 17:31:43  
**Attachments:** [email\\_852418dc-7261-46bd-8cad-0f5cfb922b46.png](#)  
[phone\\_fb192a96-ab34-4721-a173-456574efed4b1.png](#)  
[web\\_64d727b2-84ca-4794-bc60-45e02ad63d06.png](#)  
[home\\_d16e0b8ad-bed2-44cf-a08c-5ceec6c9c3fe.png](#)  
[external-signature\\_6737b7d5-5705-4554-b86d-f0ded9774efe.png](#)  
[IFI\\_Submission\\_PoW\\_S0012-05.pdf](#)

---

**From:** Cormac Goulding <[Cormac.Goulding@fisheriesireland.ie](mailto:Cormac.Goulding@fisheriesireland.ie)>  
**Sent:** Wednesday, May 22, 2024 4:44 PM  
**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>  
**Cc:** Lynda Connor <[Lynda.Connor@fisheriesireland.ie](mailto:Lynda.Connor@fisheriesireland.ie)>; Donnachadh Byrne <[Donnachadh.Byrne@fisheriesireland.ie](mailto:Donnachadh.Byrne@fisheriesireland.ie)>; Oliver McGrath <[Oliver.McGrath@fisheriesireland.ie](mailto:Oliver.McGrath@fisheriesireland.ie)>  
**Subject:** S0012-05 Dumping at Sea Permit Application from Port of Waterford Company

To whom it may concern,

Please find attached a submission from Inland Fisheries Ireland in respect of the above licence application to the EPA.

Regards,

Cormac

**Cormac Goulding**

**Fisheries Environmental Officer**

[✉ Cormac.Goulding@fisheriesireland.ie](mailto:Cormac.Goulding@fisheriesireland.ie) • [☎ +353 \(0\)52 6180 055](tel:+353(0)526180055) • [🌐 www.fisheriesireland.ie](http://www.fisheriesireland.ie) • [🏠 E91 RD25](#)

---



**Iascach Intíre Éireann**  
**Inland Fisheries Ireland**

beo líne / hotline  
**0818 34 74 24**

Oscailte 24 uair an lae / 7 lá in aghaidh na seachtaine  
Open 24 hours a day / 7 days a week



Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species.  
Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

Environmental Licensing Programme,  
Office of Environmental Sustainability,  
Environmental Protection Agency,  
Johnstown Castle,  
Co. Wexford



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

22 May 2024

Re: **S0012-05 Dumping at Sea permit application from Port of Waterford Company**

Location: Waterford Harbour

Submitted via email to: [licensing@epa.ie](mailto:licensing@epa.ie)

To whom it may concern:

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource. In respect of the above application for licensing IFI wish to make the following observations:

The proposed dredging works span four water bodies, namely the Middle Suir Estuary, Lower Suir Estuary, Barrow Suir Nore Estuary and Waterford Harbour. All have an Ecological Status of *Moderate*, and are all considered *At Risk* of not meeting Good Status in the current WFD cycle. The disposal site is located in the Eastern Celtic Sea which has *High* WFD Status.

The transitional waters of the Barrow, Nore and Suir and Waterford Harbour are designated as Special Areas of Conservation under the EU Habitats Directive. Among the qualifying interests are anadromous (migratory) species including Atlantic Salmon, Sea Lamprey, Twaite and Allis Shad. In addition, Smelt, listed in the Irish Red Data Book for Vertebrates, has significant populations in these waters. These waters also contain an important resident population of European Eel, listed by the IUCN as a critically endangered species, as well as being an important migratory route for juvenile and adult eels.

The proposed dredging has the potential to impact on fish passage into the Nore, Suir and Barrow Rivers. Dredging is disruptive of the channel bed, disturbing its physical form and ecology by removing or destroying habitats, with potentially negative consequences for the species resident within or on the dredged area. Plough dredging in particular generates elevated suspended solids concentrations in the water column. This impacts adversely on fish respiration, leads to abrasions and infection, can result in the deposition of fines onto spawning areas, impedes swimming and obstructs fish passage, and reduces dissolved oxygen levels in the water.

Notwithstanding the maintenance of the existing overall tonnage of dredged material, the timing of works and the extension of the dredging areas increases the probability that fish will be adversely impacted. Of particular concern is the dredging at Cheek Point, which lies at the intersection of the Barrow, Nore and Suir catchments, and is a critical area for fish migration affecting a sizable portion of the total freshwater catchment area of the country. Together these catchments drain an area of over 9,000km<sup>2</sup>.



**Iascach Iníre Éireann  
Inland Fisheries Ireland**

The closed period for plough dredging applied elsewhere (1 March to 30 June) does not extend to the site at Cheek Point. The applicant's documents indicate that plough dredging at the primary dredging sites, including Cheekpoint, will be required twice a year. IFI queries why the timing of dredging operations at Cheekpoint cannot be aligned with that imposed at other sites. In the interests of the protection of migratory fish species, IFI request that consideration be given to the extension of the closed period from 1 March to 30 June at Cheek Point. Extending the closed period would serve a valuable role in reducing potential adverse impacts to the migrating fish.

The licence application also includes a proposed extension for plough dredging at the Cheekpoint Lower Bar, increasing from 8.4ha to 16.53ha. IFI queries whether additional tonnage will be dredged at this site, despite the fact that the overall dredging tonnage does not change? IFI ask that the applicant undertake an analysis of the potential impact of the extension of the dredging area at Cheekpoint on fish populations and migration.

Plough Dredging at Cheek Point is also proposed to coincide with spring tides. Notwithstanding the applicant's reasons for pursuing this approach, spring tides also coincide with peak fish migrations. Salmon migrations tend to coincide with the full moon, whereas eel migrations occur on the new moon. Both species' migrations coincide with periods when plough dredging is proposed for Cheek Point, maximising its potential disruption. As mentioned above, the applicant states that plough dredging occurs twice yearly at the primary dredging sites. Therefore, this should be timed to minimise the impacts on migratory fish species within the estuary.

The licence application also states that bed levelling is permitted at all times, with no seasonal or other restrictions in place with regard to this activity. There is also no analysis or consideration of the impact of bed levelling on suspended solids concentrations. IFI requests that more stringent restrictions are imposed on when and where bed levelling can occur and that these are aligned with IFI's concerns outlined elsewhere in this correspondence.

IFI also request that consideration be given to the greater use of trailer suction hopper dredging (TSHD) relative to plough dredging from which the release of suspended solids is far less controlled. IFI notes that the applicant's documents provide a mean dredging time for TSHD, but not for Plough Dredging.

IFI also wishes to highlight that the Waterford Estuary contains the highest nitrogen loading for any estuary in the country. This is primarily due to the intensification of agriculture in the three catchments feeding into the estuary. Estuaries and transitional waters are particularly sensitive to elevated nitrogen concentrations, where it is often the limiting nutrient. Dissolved Inorganic Nitrogen (DIN) levels in the Suir, Nore and Barrow estuaries are all in excess of the threshold for Good Water Status (2.6mg/l as N) (EPA, 2021). Though dredging activity does not contribute directly to DIN levels, an assessment of the contribution of the continual resuspension of bed material on nutrient levels within the estuary needs to be considered by the applicant.

In addition, the re-suspension of bed material can mobilise phosphorous and increase its available fraction, further contributing to eutrophication, particularly in the upper reaches of the estuary where freshwater levels can reach levels capable of sustaining freshwater aquatic life. The cumulative impacts of this need to be considered by the applicant.



**Iascach Iníre Éireann  
Inland Fisheries Ireland**

The applicant has also applied for a contingency tonnage of 175,000 dry tonnes in addition to its existing licence allowance of 823,513 wet tonnes. The applicant's documents state that this increased allowance is requested due to the inclusion of Creadan Bank on this application. Therefore IFI requests that restrictions are placed on the contingency tonnage, including the implementation of the close season from 1 March to 30 June as applied at other sites, and that the contingency tonnage is permitted for the Creadan Bank area only.

With regard to the mitigation measures listed in Section 7.1.3 of the Natura Impact Statement, IFI feels that these are vague and unquantified, making them extremely difficult to monitor or enforce. For example, there is a reference to Best Practice Measures, without stating what these are. There is also a general commitment to minimising overflow of dredged material, without providing specific details on thresholds.

With regard to the dumping site, this site has been utilised continuously by the applicant since the inception of its dredging and disposal operations. IFI requests that capacity of the site for additional material be assessed, as well as concerns regarding its siting and proximity to the estuary with respect to the risk of backwash of material into the estuary.

Finally, IFI request that in the event of any incident with the potential to impact on water quality or fish welfare directly or indirectly, that the licensee / contractor should be obliged to notify IFI immediately. The results of any analysis carried out as part of the licensing should be published and made available to authorised persons as defined under the Local Government (Water Pollution) Acts (as amended).

Should you require any clarification on the above please do not hesitate to contact me. Future correspondence including acknowledgements of this submission can be sent to [cormac.goulding@fisheriesireland.ie](mailto:cormac.goulding@fisheriesireland.ie) or by post to the address below.

Yours sincerely,

---

Cormac Goulding  
Fisheries Environmental Officer  
South-Eastern River Basin District

CC: Ms. Lynda Connor, Director, SERBD, IFI  
Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, SERBD, IFI  
Mr. Oliver McGrath, Fisheries Environmental Officer, SERBD, IFI