

## Jose Alonso

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**Subject:** FW: S0033-01 Dublin Port Company - Dublin Port - Dumping at Sea Permit Application  
**Attachments:** Letter page 1.pdf; Letter page 2.pdf; Letter page 3.pdf

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**From:** Sandra Doyle <Sandra.Doyle@fisheriesireland.ie>  
**Sent:** Friday, November 8, 2024 11:48 AM  
**To:** Jose Alonso <J.Alonso@epa.ie>  
**Cc:** Cathal Gallagher <Cathal.Gallagher@fisheriesireland.ie>; Ronan Matson <Ronan.Matson@fisheriesireland.ie>  
**Subject:** RE: S0033-01 Dublin Port Company - Dublin Port - Dumping at Sea Permit Application

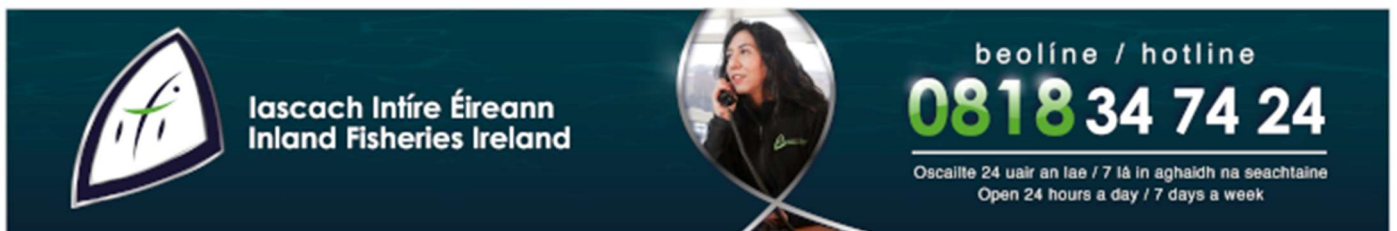
Dear Jose

Please find enclosed response in relation to your correspondence sent to Mr. O'Donnell in relation to the dumping at sea application reg. No S0033-01.

Many thanks

**Sandra Doyle**  
**PA to Head of Research and Development**

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The banner features the Inland Fisheries Ireland logo on the left, which consists of a stylized fish and a leaf. To the right of the logo is the text 'Iascach Iníre Éireann' and 'Inland Fisheries Ireland'. In the center, there is a circular inset image of a woman talking on a mobile phone. On the right side of the banner, the text 'beolín / hotline' is written above the large number '0818 34 74 24'. Below the number, it says 'Oscailte 24 uair an lae / 7 lá in aghaidh na seachtaine' and 'Open 24 hours a day / 7 days a week'.

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**Case reference: S0033-01**

**08/11/2024**

**Re: S0033-01 Dumping at Sea application from Dublin Port Company for Dublin Port**

In relation to the above proposed development and your correspondence dated, please find IFI's comments outlined below:

- Dublin Port is located within the catchments of the Rivers Liffey, Dodder and Tolka. The Tolka constitutes a salmonid system (under significant ecological pressure) while the Liffey and Dodder represent some of the foremost salmonid systems in this region. Developments in the Port area have significant potential to impact directly on aquatic ecology in this area.
- Both migratory and resident fish groups utilise coastal habitat in the vicinity of the proposed dredging area application at some time during their life cycle. Migratory Atlantic salmon, Sea trout, and Lamprey (juvenile fish on their seaward run and adult fish returning from the sea to spawn) have to pass through the Liffey Estuary /Dublin Harbour to reach the sea or return to their spawning grounds. Large numbers of eels also migrate through this area.  
Estuaries / transitional waters include a variety of different habitats. Their importance to fisheries relate to the fact that migratory fish must pass through these zones on their passage to / from the sea, while such transitional waters also act as important spawning / nursery areas for a wide variety of different marine fish species. All three Irish Lamprey species migrate through the dredging zone and are listed as Annex II species under the EU Habitats Directive.
- Consideration of resident and transient fish species must be made when considering operational working hours.  
In terms of time windows, the following are relevant, in regard to planning of the proposed dredging schedule:

Summer inward migration of 1-sea winter salmon or grilse, migration of adult river lamprey into the area from late summer through Autumn and Winter.  
Spring downstream migration (March – May) of salmon smolts moving out to sea.  
Winter – Spring glass eel recruitment and elver upstream migrations of European eel  
Autumn – Spring downstream migration of adult silver eel, European eel (beginning as early as August).

- IFI is conscious of the importance of operations necessary for ports to function. However, IFI also has obligations under its legislation in regard to conservation of a wide range of fish species. It is evident that dredging generates sediment loads in the water column and such sediment can impact adversely on migration and movement of fish species when the activity is taking place in confined areas. Any proposal to dredge on a 24/7 basis would have potential to impact adversely on aquatic species in the vicinity caused by no respite in generation of sediment releases. This would not be a satisfactory situation for migratory fish species – salmon, eel or river lamprey as in the Liffey. In combination effects should be considered with other plans for the port. This includes the Dublin Port 2022 – 2029 Maintenance Dredging.
- The disturbance effect of the dredging is difficult to quantify but mitigation measures such as soft start and ramp up along with periods of relief when dredger is offsite to dump sediment will reduce the impact. The dredger pumps being switched off or in neutral when raised and moving to a new location will also reduce the risk of fish entrainment.
- The resuspension of dredge material should not impact negatively on the fisheries of this area in any way. Toxic contaminants in water or sediment can kill marine life (e.g. fish and invertebrates). It appears from contaminant analysis that general levels in sediment at this site are within a range considered 'normal' in Irish coastal waters however typical ranges are not well documented.
- A precautionary and weight of evidence-based approach is recommended in the Marine Institute's 'GUIDELINES FOR THE ASSESSMENT OF DREDGE MATERIAL FOR DISPOSAL IN IRISH WATERS' (Cronin et al., 2006) and should be applied in this case.
- Dredging works including deposition at the receiving site should be carefully planned, taking tidal conditions into consideration to ensure that dredging is only carried out when currents will carry the dredge plume away from sensitive receptors.

I trust you will take our concerns on board when assessing this application

Yours sincerely,

Roisin O' Callaghan

Senior Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

**Iascach Intire Eireann**

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