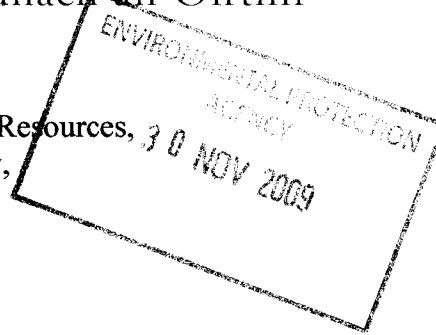




Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir

Office of Climate, Licensing and Resources,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford



Fisheries Ireland

Our Natural Heritage

26<sup>th</sup> November, 2009

**Re: Waste Water Discharge Licence Application in respect of Agglomeration  
Named Inniskeen Waste Water Treatment Plant. Ref: D0348-01**

Dear Sir/Madam,

We refer to the above-mentioned application for a waste water discharge licence at Inniskeen WWTP, Inniskeen, Co Monaghan. The Board has the following observations to make in relation to this.

From monitoring data supplied, it is clear that the WWTP has had little or no effect on the receiving water body during these sampling episodes. However it should also be necessary to include detailed, accurate assimilative capacity calculations in order to examine the potential effect of the discharge on the receiving environment in present and future scenarios. In the sub-section entitled Current Discharges within section F of the application form, calculations expressed in Table 5 and 6 shows extremely high ortho-phosphate concentrations within the column entitled "Resultant conc in river mg/l (max)". As presented, these figures would signify a very highly polluted waterbody and so, should have been highlighted in the main body of the application form. Therefore, these figures should be re-examined, and possibly amended if necessary.

The application also examines the potential effect of the discharge on the Fane when it is operating at design capacity in Section F of the application. However, it neglects to examine the potential future nutrient conditions (namely orthophosphate and ammonia) of The Fane due to the discharge. The Fane has been classed as at risk of not achieving at least good status by 2015, which is the core objective of the Water Framework Directive. It is currently at moderate status. The nutrient conditions of a waterbody are central to it achieving good status as per schedule 5 of The Surface Water Regulations (S.I. No.171 of 2009) and so these factors should be included in any assimilative capacity calculations.

The Eastern Regional  
Fisheries Board

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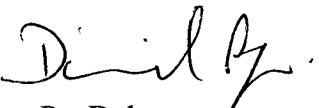
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The Fane is a particularly productive salmonid system. The river holds good stocks of Brown Trout, Salmon and Sea Trout. In fact, this is the only river on the east coast, which is open for angling, i.e. there are sufficient numbers of Salmon and Sea Trout returning to the river to allow for recreational fishing. Therefore it is imperative that this discharge has no negative effect on this valuable natural resource.

We trust you will take note of our observations. Please keep us informed of your progress with this application.

Regards,

  
PP Pat Doherty  
**Chief Executive Officer**

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