

Submission 1 #



## Eastern Regional Fisheries Board

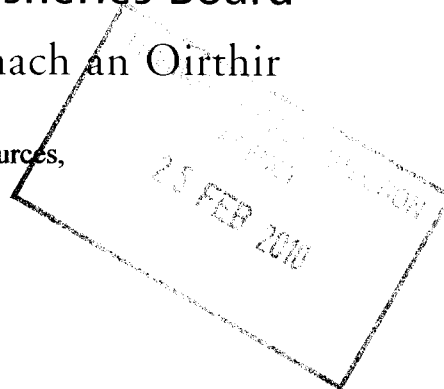
Bord Iascaigh Réigiúnach an Oirthir

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

Our Ref:MK3.d



**Fisheries Ireland**  
Our Natural Heritage



24<sup>th</sup> February, 2010

**Re: Waste Water Discharge Licence Application in respect of Agglomeration Named Annyalla Waste Water Treatment Plant. Ref: D0465-01**

Dear Ms. Keavey,

We refer to the above-mentioned application for a waste water discharge licence at Annyalla WWTP, Mullaghduff, Co. Monaghan. Having examined the documents submitted we have the following comments to make in relation to it.

As is noted in Section F of the application, it neglects to carry out assimilative capacity calculations to examine the effect of the plants effluent discharge on the receiving watercourse during low flow conditions. Without this, the only information provided to assess the plants impact on the receiving environment is contained in Tables F.1(i)(a). Upon examination of this we would have grave doubts about the sustainability of the WWTP functioning in its present state. The sampling data shows significant increases of NH<sub>3</sub>, PO<sub>4</sub> and BOD concentrations from values which would be indicative of a high quality stream above the discharge, to values which would far exceed the limits for good river status as per schedule 5 of The Surface Water Regulations (S.I. No.272 of 2009), downstream of the discharge.

As explained in the application, Annyalla WWTP discharges to The Carrickaslane Lough Stream. This watercourse 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. From the information provided it could be concluded that unless action is taken, the WWTP discharge could be a major factor in the streams failure to achieve good status by 2015.

The Carrickaslane Lough Stream is part of the Fane catchment which is a very valuable resource. 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.

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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