This Report has been cleared for submission to the Board by Senior Inspector, Mr Brian Meaney

Signed: Dorothea Richardi

Date: 24th AUGUST ***2016***

Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

OFFICE OF ENVIRONMENTAL SUSTAINABILITY

ADDENDUM TO AN INSPECTOR'S REPORT ON A LICENCE APPLICATION

To:	Directors	
From:	CAITRÍONA COLLINS	**- LICENSING UNIT**
Date:	24TH AUGUST 2016	
RE:	Application for a Waste Licence from Port of Cork Company, Licence Register W0290-01	

A Recommended Determination and Inspector's Report (dated 15th August 2016) were presented to the Board of the Agency on 23rd August 2016 and a decision on the application was deferred. This addendum report provides clarification for members of the Board of the Agency in relation to Port of Cork Waste licence application (Licence Register w0290-01) and should be read in conjunction with my original Inspector's report, dated 15th August 2016.

Compliance with Shellfish Directive (2006/113/EC)

Bantry Bay is a designated shellfish area and there are a number of licensed aquaculture sites in Bantry Bay, the nearest of which lies approximately 1km northwest of the site which is the subject of the waste licence application, as illustrated in Figure 1.

The Shellfish Directive (2006/113/EC), transposed in Ireland by the Quality of Shellfish Waters Regulations (S.I. No. 268 of 2006), as amended, aims to support shellfish life and growth and to contribute to the high quality of directly edible shellfish products within designated shellfish areas.

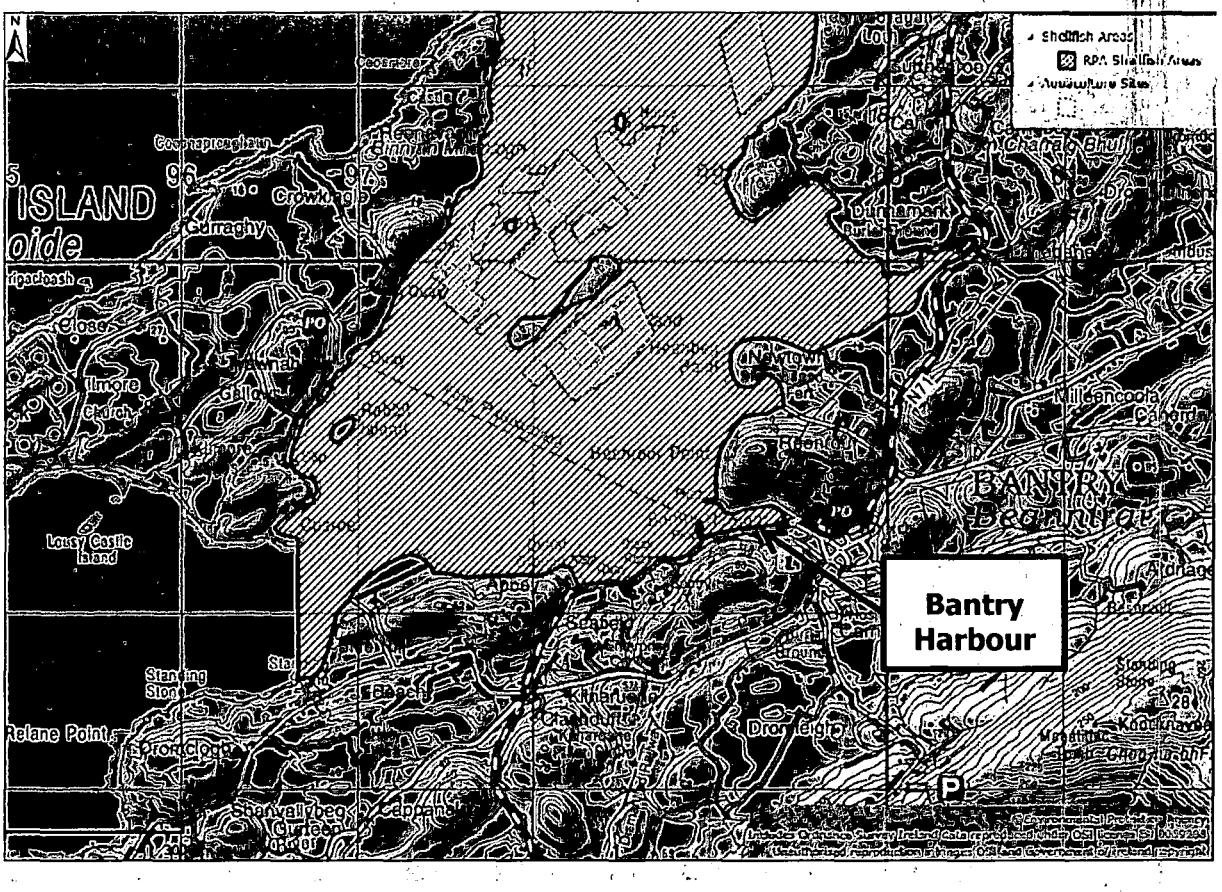

Figure 1 Shellfish areas and licensed aquaculture sites in Bantry Bay

It is stated in the Environmental Impact Statement that the available information from the shellfish monitoring programme carried out by the Marine Institute in the vicinity of the proposed activity, indicates issues with faecal contamination, which is not a relevant matter for this waste licence application. However, 21 water samples analysed for general components, metals and organics between 2004 and 2010 did not breach mandatory and guideline values for these parameters (including arsenic, copper, cadmium, chromium, mercury, nickel, lead and zinc).

The Environmental Quantitative Risk Assessment (EQRA) considered the disturbance of fine sediments during the dredging activity (which is not proposed for regulation under a waste licence). It concluded that the contamination risk is short lived due to dilution and dispersion in the open harbour environment. The worst case scenario calculations predicted that, while there was potential for average TBT concentrations to be elevated just above the annual average surface water EQS[1] in the immediate area of the dredging work, all other concentrations were below their respective EQS values. In addition, it has been demonstrated in the EIS that suspended sediment concentrations in the water column during the dredging operation would be very low outside the confines of the harbour.

[1] Environmental quality standard, as set out in the European Communities Environmental Objectives (Surface Water) Regulations 2009 as amended (S.I. No. 272 of 2009 s amended by S.I. No. 386 of 2015).

The EQRA further concludes that the risk of contamination from the licensable activities at the site is also very low. In addition, it is stated in the EIS that an armoured bund, put in place for the purpose of land reclamation, will prevent the dredged material from escaping into the surrounding waters, thus providing safety for shellfish within the local area. While this this is stated in the context of an infill area that was not featured in the waste licence application, by extension the same protection will be in place at the amenity area, where a Perimeter Engineered Revetment Structure (PERS) will be constructed, and at the town pier and quayside area, where an impermeable sheetpile system will be put in place.

Therefore, it is not anticipated that there will be an impact on shellfish waters as a result of the activities to be carried out under the waste licence. The RD provides for manual and automatic monitoring of suspended solids, heavy metals and a number of other parameters in the marine water in Bantry Harbour.

Signed

Caitriona Collins

Caitríona Collins

Procedural Note

In the event that no objections are received to the Proposed Determination of the application, a licence will be granted in accordance with Section 87(4) of the Environmental Protection Agency Acts 1992 as amended as soon as may be after the expiration of the appropriate period.