

CAPPAGH FARMERS SUPPORT GROUP

Boolaglass

Askeaton

Co.Limerick

9-6-2016

Marine Planning and Foreshore Section

Department of Environment

Community and Local Government

Newtown Road

Co.Wexford

Ref Number FS006578

Dear Sir

Our group wish to make a submission in relation to the proposed undertaking of maintenance dredging in the Shannon Estuary, in the vicinity of the deep water jetty at the Aughinish Alumina Plant in Askeaton County Limerick.

Our concern is, the removal of high points on the river bed that are been dumped out to Sea. Such removal will have a serious negative impact on the environment and we believe that not enough planning into the removal of what we consider to be toxic waste incorporated into sediment on the river bed has been taken into account. The easy option is to unearth an already toxic waste area on the sea bed that this company has for years created themselves by way of pushing its bauxite left over on the jetty into the Shannon and likewise its Alumina spillage from loading ships exporting its Alumina also into the Shannon, all accumulating on the sea bed. Both the Bauxite waste and the Alumina waste contain toxic heavy metals and other dangerous chemicals.

Now we have a situation, where this company is going to unearth, which to our group is a toxic waste dump on the sea bed, creating a danger, where these chemicals/heavy metals are been disturbed because the EPA and local council have allowed this practice to continue under their watch that will contaminate the surface water that Bivalves, Mussels, Scallops, Oysters, Cockles etc. in the vicinity. It will also effect fish and fishing as a whole and will make an already vulnerable situation even worse. Not alone that, but this company will now create another toxic waste dump out at sea leading to further environmental damage. It's not a case of control the pollution situation at hand from this proposed undertaking maintenance of dredging but to create a further one using the EPA to do so away from the plant.

In section 5.2 - The Company has answered no to an EIS been required. We believe that an EIS is required due to the effects that this proposed activity will have on the environment and especially

due to the waste contents been removed and transported due to its toxic contents and the safety issue of transporting such toxic waste to a new location.

In section 5.3 - The Company states that the area is located partially or entirely within an SAC. Our group feels that this will have a negative effect on an SAC and not enough investigation has been taken into account in regard to this proposed maintenance of dredging.

In section 5.7 - The Company has answered no in regard to the public health implication arising from the proposed work. We believe that this answer should be yes due to the contents of the toxic waste at the bottom of the sea bed. A reports attached to this application shows elevated Arsenic and Nickel in the toxic waste/sediment alone.

In section 5.8 the company has answered no that this work will involve the storage and / or disposal of waste. Our group feels that this answer should be yes. It is a waste, a toxic waste that is at the bottom of this bed incorporated with sediment from the Bauxite waste and Alumina waste off the jetty onto the sea bed along with other waste from the plant itself.

In section 5.9 the company has also answered no that no other environmental considerations exists. Our group again feels that this is incorrect and has been covered in our third paragraph above.

We believe that the Minister cannot grant a foreshore licence based on the company's application as it stands and must consider other options to remove the toxic waste/sediment from the sea bed. This process is not a one off but will continue at different intervals over an eight year period which will have a detrimental effect on the environment at the jetty area and its wider area but also out at sea which will be used as a dumping ground for toxic waste by this company.

One option is the consideration of removing this toxic waste/sediment on the sea bed to the toxic mud pond (BRDA 2) by way of Lorries that are covered transporting it or by way of suction dredgers that would pump the toxic waste/sediment out directly to the toxic waste pond (BRDA 2) into cells allocated for this waste that would then be covered. The latter would be the preferred option. This method would contain the contamination within the plant of such removal of their own toxic waste.

Yours Faithfully

Pat Geoghegan

Spokesperson