

Maritime Usage Licences,
MARA,
2nd Floor, Menapia House,
Drinagh Business Park,
Drinagh,
Wexford, Y35RF29,



Iascach Intíre Éireann
Inland Fisheries Ireland

16 October 2025

Re: Maritime Usage Licence for maintenance dredging at Waterford Port 2026-2033

Licence No: LIC230025

Submitted via email to: licence@mara.gov.ie

Dear Ms. Monaghan,

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource. In respect of the above licensing application IFI wish to make the following observations:

The proposed dredging works span four water bodies. The Middle Suir Estuary, Lower Suir Estuary, Barrow Suir Nore Estuary have an Ecological Status of *Moderate*, and Waterford Harbour has a status of *Good*. All considered *At Risk* of not meeting Good Status in the current WFD cycle. The disposal site is located in the Eastern Celtic Sea which has *High* WFD Status.

The transitional waters of the Barrow, Nore and Suir and Waterford Harbour are also designated as Special Areas of Conservation under the EU Habitats Directive. Among the qualifying interests are anadromous (migratory) fish species including Atlantic Salmon, Sea Lamprey, Twaite and Allis Shad. In addition, Smelt, listed in the Irish Red Data Book for Vertebrates, has significant populations in these waters. These waters also contain an important resident population of European Eel, listed by the IUCN as a critically endangered species, as well as being an important migratory route for juvenile and adult eels.

The proposed dredging has the potential to impact on fish passage into the Nore, Suir and Barrow Rivers. Dredging is disruptive of the channel bed, disturbing its physical form and ecology by removing or destroying habitats, with potentially negative consequences for the species resident within or on the dredged area. Plough dredging in particular generates elevated suspended solids concentrations in the water column. This impacts adversely on fish respiration, leads to abrasions and infection, can result in the deposition of fines onto spawning areas, impedes swimming and obstructs fish passage, and reduces dissolved oxygen levels in the water.

IFI also wishes to highlight that the Waterford Estuary generally contains the highest nitrogen loading for any estuary in the country. This is primarily due to the intensification of agriculture in the three catchments feeding into the estuary. Estuaries and transitional waters are particularly sensitive to elevated nitrogen concentrations, where it is often the limiting nutrient.



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Dissolved Inorganic Nitrogen (DIN) levels in the Suir, Nore and Barrow estuaries all exceed the guideline threshold for Good Water Status. In some cases they are over 50% above the median winter threshold for DIN (EPA, 2025). Though dredging activity may not contribute directly to DIN levels, an assessment of the contribution of the continual resuspension of bed material on nutrient levels within the estuary needs to be considered by the applicant.

In addition, the re-suspension of bed material can mobilise phosphorous and increase its available fraction, further contributing to eutrophication, particularly in the upper reaches of the estuary. The cumulative impacts of this need to be considered by the applicant.

Notwithstanding the maintenance of the existing overall tonnage of dredged material, the timing of works and the extension of the dredging areas increases the probability that fish will be adversely impacted. Of particular concern is the dredging at Cheekpoint Lower Bar, which lies at the intersection of the Barrow, Nore and Suir catchments, and is a critical area for fish migration affecting a sizable portion of the total freshwater catchment area of the country. Together these catchments drain an area of over 9,000km².

Furthermore, the closed period for plough dredging applied elsewhere (1 March to 30 June) does not extend to the site at Cheekpoint. Therefore, in the interests of the protection of migratory fish species, IFI request that consideration be given to the extension of the closed period from 1 March to 30 June at Cheekpoint. Extending the closed period would serve a valuable role in reducing potential adverse impacts to the migrating fish. The applicant states that plough dredging at the primary sites, including Cheekpoint, will be required twice a year. IFI queries why the timing of operations at Cheekpoint cannot be aligned with the restrictions imposed at other sites.

The licence application also includes a proposed extension for plough dredging at the Cheekpoint Lower Bar, increasing from 8.4ha to 16.53ha. IFI queries whether additional tonnage will be dredged at this site, despite the fact that the overall dredging tonnage does not change? IFI ask that the applicant undertake an analysis of the potential impact of the extension of the dredging area at Cheekpoint on fish populations and migration.

Plough Dredging at Cheekpoint is also proposed to coincide with spring tides. Notwithstanding the applicant's reasons for pursuing this approach, spring tides also coincide with peak fish migrations. Salmon migrations tend to coincide with the full moon, whereas eel migrations occur on the new moon. Both species' migrations coincide with periods when plough dredging is proposed for Cheekpoint, maximising its potential disruption. The applicant states that plough dredging occurs twice yearly at the primary sites. Therefore, this should be timed to minimise the impacts on migratory fish species by adhering to the restrictions requested above.

IFI also request that consideration be given to the greater use of trailer suction hopper dredging (TSHD) or mechanical dredging relative to plough dredging from which the release of suspended solids is far less controlled. IFI notes that the applicant's documents provide a mean dredging time for TSHD, but not for Plough Dredging.

The applicant has also applied for a contingency tonnage of 175,000 dry tonnes in addition to its existing licence allowance of 823,513 wet tonnes. The applicant's documents state that this increased allowance is requested due to the inclusion of Creadan Bank on this application.



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IFI requests that restrictions are placed on the contingency tonnage, including the implementation of the close season from 1 March to 30 June as applied at other sites, and that the contingency tonnage is permitted for the Creaden Bank area only.

The licence application also states that bed levelling is permitted at all times, with no seasonal or other restrictions in place with regard to this activity. There is no analysis or consideration of the impact of bed levelling on suspended solids concentrations. IFI requests that more stringent restrictions are imposed on when and where bed levelling can occur and that these are aligned with IFI's concerns outlined elsewhere in this correspondence.

In relation to the dumping site, this has been utilised by the applicant since 1996. IFI requests that capacity of the site for additional material be assessed, as well as concerns regarding its siting and proximity to the estuary with respect to the risk of backwash of material into the estuary.

With regard to the mitigation measures listed in Section 7.1.3 of the Natura Impact Statement, IFI feels that these are vague and unquantified, making them extremely difficult to monitor or enforce. For example, there is a reference to "best practice measures to minimise the release of suspended solids", without stating what these are. There is also a general commitment to minimising the overflow of dredged material, without providing specific details on thresholds.

In relation to management of noise and vibration from dredging operations, IFI request that works have regard to the NPWS *Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters* where applicable, particularly articles 7 – 14 on Ramp-Up Procedure in section 4.3.3 of the document.

Finally, IFI request that in the event of any incident with the potential to impact on water quality or fish welfare directly or indirectly, that the licensee is obliged to notify IFI immediately. The results of any analysis carried out as part of the licensing should be published and made available to authorised persons under the Local Government (Water Pollution) Acts (as amended).

Should you require any clarification on the above please do not hesitate to contact me. Future correspondence including acknowledgements of this submission can be sent to environmentalplanning@fisheriesireland.ie or by post to the address below.

Yours sincerely,

Cormac Goulding
Senior Fisheries Environmental Officer
South-Eastern River Basin District

CC: Ms. Lynda Connor, Director, SERBD, IFI
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