

SFPA Observations on Marine Usage Licence Applications

Applicant Name & Area: Ayesa (formerly Byrne Looby) on behalf of Dept of Defence Haulbowline Naval Basin		Application No: MUL 23009
Application Category		
☐ Shellfish Aquaculture Licence ☐ Renewal of Shellfish Aquaculture Licence ☐ Fin Fish Aquaculture Licence ☐ Renewal of Fin Fish Aquaculture Licence ☐ Foreshore Licence	☒ Dumping at Sea ☐ Water discharge ☒ Harbour Developments ☐ Marine Renewables ☐ Cables/ Fiber Optics/ Site investigations	

Sea Fisheries Protection Officer Observations <i>1. Possible impacts, if any, on existing wild fisheries in the area, with an emphasis on the possible implications for the SFPA in conducting official controls and possible non-compliance issues that could arise.</i> Application MUL 23009 prepared by Ayesa (formerly Byrne Looby) on behalf of Dept of Defence appears to be for dredging of Haulbowline Basin and subsequent disposal of dredge spoil at the Cork Harbour Dredge spoil disposal area South of Power Head. MARA MUL230029-MAU is unclear on what Ayesa is applying for. Section 2.2 in the description of the proposed maritime usage is for maintenance dredging of 'the entrance channel' and for the Southern part of the Graving dock to ensure that the Naval fleet can safely navigate (<i>into and out of the basin</i>) and allow the Naval Base to remain operational. Does the applicant not mean the Northern Part of the Graving dock? Section 2.4 of MARA MUL 230029 'Timings of Works/Activity points to Dredging Campaign 1 scheduled for Q4 2024 – Q1 2025 for 'Removal of contaminated material' described as contaminated spoil unsuitable for disposal at sea.

The Assessment of Impacts of the MUL application compiled by Ayesa identifies two separate areas within the Haulbowline Island basin, one for routine maintenance dredging and one area of contaminated spoil unsuitable for disposal at sea.

It further outlines area B as the entire Haulbowline basin and Graving dock stating that the proposal is to dredge the Graving Dock to a depth of -5.5 m CD or the original Graving Dock floor.

The assessment of impacts document outlines the proposed dredging activities as follows:

- Entrance channel and Harbour Basin are to be Dredged to -5.5 m CD (charted depth);
- Dredging the Graving Dock to -5.5 m CD or the floor of the historical Graving Dock, whichever is first.
- Suitable dredge material (i.e. non-contaminated) will be loaded onto a hopper barge and taken to the dump site South of Power Head.
- Disposal of contaminated dredged material to a licensed landfill facility.

The contaminated dredged material is unsuitable for disposal at sea and requires stabilisation and drying before being disposed of at a licensed facility.

The application estimates a total of 105,630 m³ of dredged material with 15630 m³ of contaminated material.

Should the application be for the entire basin and graving dock, SFPA have serious concerns on the effectiveness of differentiating and separating contaminated spoil from dredged material suitable for dumping at sea.

Specifically, for the disposal of suitable dredge spoil (ie NOT contaminated) at the Cork Harbour Dredge spoil disposal area South of Power Head, an area used by the fishing industry year-round for both crustacean and demersal fisheries.

It is believed that such disposal of dredge spoil activities will negatively impact on existing fisheries, however, in view of the relatively small area contained in the Cork Harbour Dredge spoil disposal area South of Power Head, it is believed that the overall impact will be low

2. Possible impacts, if any, on adjacent or nearby shellfish production areas adjacent, including possible implications for the SFPA in conducting official controls and possible non-compliance issues that could arise.

Application MUL 23009 prepared by Ayesa (formerly Byrne Looby) on behalf of Dept of Defence **appears** to be for dredging of Haulbowline Basin and subsequent disposal of dredge spoil at the Cork Harbour Dredge spoil disposal area South of Power Head.

MARA MUL230029-MAU is unclear on what Ayesa is applying for. Section 2.2 in the description of the proposed maritime usage is for maintenance dredging of 'the entrance channel' **and** for the **Southern** part of the Graving dock to ensure that the Naval fleet can safely navigate (*into and out of the basin*) and allow the Naval Base to remain operational.

Does the applicant not mean the **Northern** Part of the Graving dock?

Section 2.4 of MARA MUL 230029 'Timings of Works/Activity points to Dredging Campaign 1 scheduled for Q4 2024 – Q1 2025 for 'Removal of **contaminated** material' described as contaminated spoil unsuitable for disposal at sea.

The Assessment of Impacts of the MUL application compiled by Ayesa identifies two separate areas within the Haulbowline Island basin, one for routine maintenance dredging and one area of contaminated spoil unsuitable for disposal at sea.

It further outlines area B as the entire Haulbowline basin and Graving dock stating that the proposal is to dredge the Graving Dock to a depth of -5.5 m CD or the original Graving Dock floor.

The assessment of impacts document outlines the proposed dredging activities as follows:

- Entrance channel and Harbour Basin are to be Dredged to -5.5 m CD (charted depth);
- Dredging the Graving Dock to -5.5 m CD or the floor of the historical Graving Dock, whichever is first.
- Suitable dredge material (i.e. non-contaminated) will be loaded onto a hopper barge and taken to the dump site South of Power Head.
- Disposal of contaminated dredged material to a licensed landfill facility.

The contaminated dredged material is unsuitable for disposal at sea and requires stabilisation and drying before being disposed of at a licensed facility.

The application estimates a total of 105,630 m³ of dredged material with 15630 m³ of contaminated material.

Should the application be for the entire basin and graving dock, SFPA have serious concerns on the effectiveness of differentiating and separating contaminated spoil from dredged material suitable for dumping at sea.

An active Oyster production area is located in the Rostellan/Aghada area some 4 nautical miles east of Haulbowline. Disturbed contaminated spoil emanating from the basin could pose a very serious deleterious effect on the microbiological quality of Oysters produced in Rostellan.

Alternatively, if the application is only for maintenance dredging of the entrance channel and of Haulbowline Basin excluding the contaminated area of the Graving dock with subsequent disposal of dredge spoil at the Cork Harbour Dredge spoil disposal area south of Power Head. it is believed by SFPA, that MUL 23009 application will not have an impact on shellfish growing areas, as no such shellfish growing areas are in existence within the Power Head Area.

3. Possible impacts, if any, on seafood safety, with an emphasis on the implications for the SFPA in conducting official controls and possible non-compliance issues that could arise.

Application MUL 23009 prepared by Ayesa (formerly Byrne Looby) on behalf of Dept of Defence **appears** to be for dredging of Haulbowline Basin and subsequent disposal of dredge spoil at the Cork Harbour Dredge spoil disposal area South of Power Head.

MARA MUL230029-MAU is unclear on what Ayesa is applying for. Section 2.2 in the description of the proposed maritime usage is for maintenance dredging of 'the entrance channel' **and** for the

Southern part of the Graving dock to ensure that the Naval fleet can safely navigate (*into and out of the basin*) and allow the Naval Base to remain operational.

Does the applicant not mean the **Northern** Part of the Graving dock?

Section 2.4 of MARA MUL 230029 'Timings of Works/Activity points to Dredging Campaign 1 scheduled for Q4 2024 – Q1 2025 for 'Removal of **contaminated** material' described as contaminated spoil unsuitable for disposal at sea.

The Assessment of Impacts of the MUL application compiled by Ayesa identifies two separate areas within the Haulbowline Island basin, one for routine maintenance dredging and one area of contaminated spoil unsuitable for disposal at sea.

It further outlines area B as the entire Haulbowline basin and Graving dock stating that the proposal is to dredge the Graving Dock to a depth of -5.5 m CD or the original Graving Dock floor.

The assessment of impacts document outlines the proposed dredging activities as follows:

- Entrance channel and Harbour Basin are to be Dredged to -5.5 m CD (charted depth);
- Dredging the Graving Dock to -5.5 m CD or the floor of the historical Graving Dock, whichever is first.
- Suitable dredge material (i.e. non-contaminated) will be loaded onto a hopper barge and taken to the dump site South of Power Head.
- Disposal of contaminated dredged material to a licensed landfill facility.

The contaminated dredged material is unsuitable for disposal at sea and requires stabilisation and drying before being disposed of at a licensed facility.

The application estimates a total of 105,630 m³ of dredged material with 15630 m³ of contaminated material.

Should the application be for the entire basin and graving dock, SFPA have serious concerns on the effectiveness of differentiating and separating contaminated spoil from dredged material suitable for dumping at sea.

An active Oyster production area is located in the Rostellan Aghada area some 4 nautical miles East of Haubowline. Disturbed contaminated spoil emanating from the basin could pose a very serious deleterious effect on the microbiological quality of Oysters produced in Rostellan.

Oysters for which Rostellan is B classified are either eaten raw or lightly cooked and microbiological contamination of Oysters is a high risk for public health.

Alternatively, if the application is only for maintenance dredging of the entrance channel and of Haulbowline Basin excluding the contaminated area of the Graving dock with subsequent disposal of dredge spoil at the Cork Harbour Dredge spoil disposal area south of Power Head. it is believed by SFPA, that MUL 23009 application will not have an impact on shellfish growing areas, as no such shellfish growing areas are in existence within the Power Head Area, and the application would not pose an impact on seafood safety.

Sea-Fisheries Protection Authority

Clonakilty Port

Date:

14 October 2025