

## **MUL250022 - Uisce Eireann, River Suir Estuary**

**Proposed activity:** Uisce Eireann has submitted an application to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence under Section 117 of the Maritime Area Planning Act 2021 (the MAP Act) to undertake Hydrographic, Geophysical, Geotechnical, and Environmental surveys to inform and design WwTP upgrade within the River Suir Estuary adjacent to the townlands of Kilmurry, Gorteens, Little Island, Ballycanvan Big and Faithlegg.

### **BIM Comments:**

**08.05.26**

BIM acknowledge that an SISEIA assessed the implications of the project on the potential for effects on water quality within the receiving environment and that it concluded that, based on the scale and scope of the proposed project no impact on the any receiving waterbody will occur. It further noted that the proposed project is required to inform the future upgrading of an existing wastewater treatment which will ultimately improve the water quality within the receiving environment. Shellfish however do bioaccumulate through filter feeding and the BIM concern would be that chemicals/metals (Waterford Framework Directive 45 Priority substances) could potentially be dispersed in fine sediments through the planned activity of borehole drilling. We note that the MUL application states that grab samples will be tested for chemicals and that we recommend they are tested for WFD Priority Substances before drilling and that if any levels of priority substances are very high that BIM are notified. To mitigate further any potential risk of bioaccumulation of WFD Priority substances we would recommend borehole drilling be undertaken on flooding tides to lessen downstream transport of fine sediments.

We note that the MUL application has plans in place for oil and chemical spills and we ask that BIM are notified immediately of any spills of that nature.

BIM are not aware of active fisheries that are taking place within the survey area proposed. However, there would be migratory fish that pass through the area, which are referenced in the 'Supporting Information for Screening for Appropriate Assessment (SISAA)' document. The species that are 'Screened In' as been potentially impacted by the survey techniques include Atlantic Salmon, Twaite Shad and Lamprey (Sea and River).