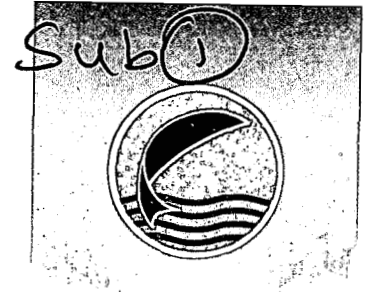


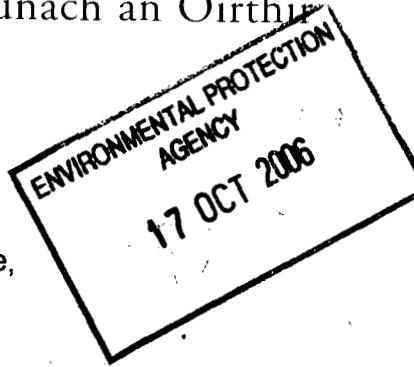


## Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland  
Our Natural Heritage



Gráinne Oglesby  
Office of Licensing and Guidance,  
EPA Headquarters  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford.

Your Reference – Reg. No P0805-01  
Our Reference – BB/DD/01

October 16<sup>th</sup>, 2006

**Re: IPPC licence application –Green Isle Foods, IDA Industrial Estate,  
Monread Road, Naas, Co. Kildare.**

Dear Ms. Oglesby,

With regard to the above IPPC application, the Board has no objections from a fisheries perspective. However, the following observations are important to highlight in relation to the application:

- The ecological integrity of the Grand Canal (pNHA 02104) and River Liffey (Morell Tributary), constituting a highly important salmonid system nationally, must be protected at all times and should not deteriorate in any way as a result of the proposed IPPCL. The Morell River is an extremely productive tributary of the Liffey. Salmon spawn annually at a location on the Morell in close proximity to the applicant site. The Morell River supports a resident population of Brown trout and migratory populations of Sea trout (*Salmo trutta*) and Atlantic salmon (*Salmo salar*). Thus it is important to note that salmonid waters constraints apply to any development in this area.
- The Rivers Liffey and Morell are exceptional among most urban rivers in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout (*Salmo trutta trutta*) in addition to resident Brown trout (*Salmo trutta*) populations. This highlights the sensitivity of local watercourses and the Liffey catchment in general. Fishery habitat is regarded as particularly good for all salmonid life stages throughout much of the Morell system.
- Only clean, uncontaminated surface and storm waters must be permitted to discharge to the surface water network in the area so that the salmonid status of local watercourses is protected.

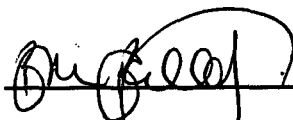
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- The physical manipulation of any stream or watercourse (including the riparian zone) contained within the site must first be submitted to the Board for approval.
- BAT measures regarding effluent / stormwater management must be fully applied. Pollution of the adjacent freshwaters from poor on-site construction or operational practices could have a significantly negative impact on the fauna and flora of this surface water system. A comprehensive and integrated approach for achieving river and stream protection during construction and operation should be implemented. On-site attenuation ponds should allow for the settlement of fine/particulate materials. High class petrol / oil interception and hydro-brake controls should be in place both on individual high risk discharges (e.g. basement carparks) and on primary surface water discharges to protect receiving freshwaters. Diffuse and point sources of pollution should be addressed and managed by implementing best practice in pollution control in the long term at this site (Sustainable Urban Drainage Systems). Interception technology efficiency is highly dependent on ongoing maintenance of these structures. A comprehensive long-term maintenance programme should be implemented to service these online features.
- It is recommended that the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" be consulted when undertaking any works on this site, particularly in the vicinity of surface waters. The Board requests that it be informed at least 3-4 weeks in advance of any diversion work to be carried out during channel alterations of any kind.
- Water quality monitoring should be undertaken as per best practice.
- Appropriate environmental protection measures are the responsibility of the developer and the contractor, and all works are subject to the provision of the Local Government (Water Pollution) Act 1977 (as amended) and the Fisheries (Consolidation) Act 1959 (as amended).

I trust you will take our observations on board when assessing this application.

Yours sincerely,



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Brian Beckett  
**Fisheries Environmental Officer – Dublin District**