



**Guidance Document on the Preparation and  
Submission of the Annual Environmental Report  
for Dumping at Sea Permit Holders**

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## Table of Contents

1. Introduction.....	3
2. Register of Loading and Dumping at Sea Activities .....	3
3. OSPAR Dumping Report .....	4
4. Marine Positional Log.....	4
5. Reported Incidents Summary.....	5
6. Complaints Summary .....	6
7. Environmental Liability and Financial Provisions .....	6
8. AER Submission Details .....	8
9. Helpdesk Assistant .....	8
Appendix 1.....	9
OSPAR Reporting Template.....	9

## 1. Introduction

As part of the requirements of the Dumping at Sea permits, permit holders are required to prepare and submit an **Annual Environmental Report (AER)** that is to the satisfaction of the EPA. This guidance document is provided to assist with the preparation of the AER. The following points should be noted about the AER:

- The annual reporting of environmental information in the form of an AER is a **legal requirement** for all holders of a Dumping at Sea (DaS) permit.
- The content of the AER is outlined in the DaS permit and it should cover the previous calendar year. More details on content are provided in this guidance document.
- The OSPAR dumping report for the relevant year must be included in the AER – refer to **Section 3** of this guidance document.
- The AER may include any other items as specified by the EPA.
- If items are omitted or not presented in an acceptable manner, the EPA reserves the right to reject the AER report on these grounds.
- The permit holder shall submit a **pdf copy** of the AER electronically via the DaS specified email address: [das@epa.ie](mailto:das@epa.ie), by the **31<sup>st</sup> of March each year** - refer to **Section 8** of this guidance document.

## 2. Register of Loading and Dumping at Sea Activities

Adequate information on loading and dumping at sea activities should be automatically recorded during each dumping voyage – the details of which are outlined in the DAS Permit. A full record shall be kept by the permit holder on matters relating to each load of the substance or material intended to be dumped, and put on board the vessel. The register or log of the loading and dumping at sea activities shall be submitted in **summary form** as part of the AER.

A pre-loading and post-loading bathymetric survey of the loading areas is required under the DAS Permit. A map showing the before and after bathymetry, should be included in the AER. A remediation report should be included in the AER if applicable.

### 3. OSPAR Dumping Report

The permit holder is requested to include their completed **OSPAR dumping report**, as required under the OSPAR Convention, in the AER for the relevant year. It should be added to the main text of the AER which is then converted to a **pdf file**.

A copy of the completed OSPAR dumping report (Excel Template) should also be sent in a **separate email** to [das@epa.ie](mailto:das@epa.ie) and cc to **Margot Cronin** in the Marine Institute for OSPAR reporting purposes: [margot.cronin@marine.ie](mailto:margot.cronin@marine.ie).

The reporting deadline for the submission of the AER and the OSPAR dumping report is the

**31<sup>st</sup> of March** for the previous calendar year.

#### **Important:**

1. The subject line of the email and name of the OSPAR dumping report must read as **S00XX-01 OSPAR RETURN 20XX**.
2. The subject line of the email and name of the AER report must read as **S00XX-01 AER RETURN 20XX**.

Please note **S00XX-01** refers to the Permit Number for example S0004-01 refers to Dublin Port Company, while S0008-01 refers to Endesa Ireland (Tarbert Generating Station). **RETURN 20XX** refers to the reporting year of the return for example **RETURN 2011**.

A copy of the OSPAR reporting template is included in **Appendix 1** of this guidance document.

### 4. Marine Positional Log

The marine positional log is the record of the locations of the vessel during the loading and dumping activities – refer to the DAS permit. A copy of this log should be included in the AER. It is requested that the latitudes and longitudes shall be recorded in “Degrees and Decimal Minutes” only.

## 5. Reported Incidents Summary

The permit holder is required to keep a record of any incident including details of the nature, extent, and impact of, and circumstances giving rise to the incident (Refer to the DAS Permit).

An incident is defined in the permit as:

- An emergency.
  - Any loading or dumping at sea operation which does not comply with the requirements of the permit.
  - Any indication that environmental pollution has, or may have, taken place.
- The permit holder is required to notify the EPA of as soon as practicable after the occurrence of an incident by both telephone and email/web form. As part of the notification the date and time of the incident, summary details of the occurrence and where available the steps taken to minimise any impacts.
- The record of the incident is **does not** need to be included in the AER.
- The **reported incidents summary** should be included in the AER. A suggested format for the incident summary would be tabular as illustrated below:

Date	Incident description (CAUSE)	Impact (EFFECT)	List of Authorities contacted	Corrective action	Success of the corrective action	Incident Closed (Y/N)
DD/MM/YYYY	Nature, extent of and circumstances giving rise to the incident. <u>In Brief</u>	Environmental impact on marine environment or on waters.	Who was notified of the incident?	What was done about the incident?	What was the outcome of the corrective action?	Y/N

Authorities to contact in event of an incident **impacting on waters** are:

- ***Marine Institute***
- ***Sea Fisheries Protection Authority***
- ***Inland Fisheries Ireland***
- ***Bord Iascaigh Mhara***
- ***Any other relevant authorities***

Authorities to contact in event of any incident relating to marine mammals/archaeology or migratory fish are:

- *National Parks and Wildlife Service*
- *Marine Institute*
- *Sea Fisheries Protection Authority*
- *Inland Fisheries Ireland*
- *Any other relevant authorities*

## 6. Complaints Summary

The permit holder is required to keep a record all complaints of an environmental nature related to the loading and dumping at sea activities.

- Each record of complaints shall include details on the date and time of the complaint, the name of the complainant and details on the nature of the complaint. The record should include the details on the response made and the corrective action undertaken. This should be made available to the EPA on request.
- A brief summary of the complaints is to be included in the AER. A suggested format for the complaints summary would be tabular as illustrated below.

Date of complaint	Name of complainant	Nature of the complaint	Response made to the complainant	Complaint Closed (Y/N)
DD/MM/YYYY			How it was this dealt with? What was the corrective action?	Y/N

## 7. Environmental Liability and Financial Provisions

The permit holder shall as part of the AER, provide an **annual statement of measures** as to the measures taken or adopted at the loading areas and the dumping site in relation to the prevention of environmental damage, and the financial provisions in place in the relation to the costs for remedial actions following anticipated events or accidents/incidents, as may be associated with loading and dumping at sea. Please refer to the DAS Permit.

**Annual statement of measures** on prevention of environmental damage should include:

- Measures taken/adopted at loading areas and the dumping site to prevent environmental damage.
- Outlines financial provision in place for remedial action following anticipated events or incidents (should include financial provision for liabilities identified in the ELRA).
- Proof of renewal/revision of financial indemnity identified in the ELRA shall be included in the annual statement of measures. The amount of indemnity held should be reviewed at least every 3 yrs.

For general guidance as to what should be included in the annual statement of measures please contact the Environmental Liability Unit of the EPA at [elinfo@epa.ie](mailto:elinfo@epa.ie). For any site specific issues please contact your enforcement inspector.

### **Environmental Liabilities Risk Assessment (ELRA)**

The permit holder shall arrange for completion by an appropriately qualified consultant, a comprehensive and fully costed ELRA to address the liabilities from loading and dumping at sea. Please refer to the DaS permit.

The ELRA must meet the minimum criteria below:

- Must be carried out by a qualified consultant
- A report on this assessment must be submitted as part of **the second AER and subsequent AERs.**
- The ELRA should be reviewed as necessary to reflect any significant change to the volume or character of the material/substance to be loaded and dumped at sea and in any case every 3 yrs following initial agreement.
- The results of the ELRA review must be included in the AER.
- Make financial provisions to cover any liabilities identified in the ELRA. The amount of indemnity held shall be reviewed and revised as necessary, but at least triennially. This review will be included in the annual statement of measures.
- Guidance material on the preparation of the ELRA can be found at the link below:

<http://www.epa.ie/downloads/advice/licensee/elra%20guidance%20document.pdf>

## 8. AER Submission Details

The pdf copy of the AER should be attached to an email addressed to [das@epa.ie](mailto:das@epa.ie).

**Important:** The subject line of the email and name of the report must read as **S00XX-01 AER RETURN 20XX**.

**Please note:** **S00XX-01** refers to the Permit Number for example S0004-01 refers to Dublin Port Company, while S0008-01 refers to Endesa Ireland (Tarbert Generating Station). **RETURN 20XX** refers to the reporting year of the return for example **RETURN 2011**.

## 9. Helpdesk Assistant

### General Assistance with the AER Submissions

Email: [das@epa.ie](mailto:das@epa.ie)

### Technical Queries on the AER Report Content

Queries will be circulated to the relevant contact from this email address:

Email: [das@epa.ie](mailto:das@epa.ie)



## **Appendix 1**

### **OSPAR Reporting Template**

**OSPAR report on Dumping at Sea in Ireland - Reporting Template**

	<b>Additional comments</b>	
<b>Permit No.</b>		
<b>Date of issue</b>		
<b>Amount permitted (tonnes)</b>		
<b>Capital or maintenance?</b>		
<b>Method of dredging</b>		
<b>Dumpsite</b>		

**WASTES DUMPED**

If permit relates to dredge sediments please complete section A. Otherwise, complete section B

**A. DREDGED SEDIMENTS**

(a)	Specification of waste (e.g. mud, silt, sand etc.)		
(b)	Derived from harbour, estuary or open water?		
(c)	Total quantity of wastes dumped (tonnes)?		
(d)	Details of any chemical, toxicity and/or other testing carried out on these sediments. (Reports to be attached as separate documents. Include report references, date of analysis, contractors.)		
(e)	Please provide a map of the area dredged with chemical analysis sampling stations indicated. Please include details of quantities dredged from specific areas.		

(g)	What monitoring has taken place and by whom? Please attach report.		
(f)	Other relevant information		

## B. OTHER WASTES

(a)	Specification of waste		
(b)	Derived from harbour, estuary, open water or other (please specify)?		
(c)	Total quantity of wastes dumped (tonnes)		
(d)	Details of any chemical, toxicity and/or other testing carried out on this waste (reports to be attached as separate documents)		
(e)	Please provide a map of the area dredged with chemical analysis sampling stations indicated. Please provide details of specific areas and quantities dredged.		
(f)	What monitoring has taken place and by whom? Please attach report.		
	Other relevant information		

## c. DUMPING AREA :

**Note: EACH INDIVIDUAL DUMPSITE REQUIRES SEPARATE ENTRY**

### *Dumpsite 1*

(a)	Location Co-ordinates (minimum of 4):		
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Latitude (decimal degrees)		Longitude (decimal degrees)	
(b)	Depth (metres)		
(c)	Distance from coast (km)		
(d)	Tidal flows		
	Direction (degrees)		
	Maximum speed (m/s knots)		
(e)	Method of dumping (if more than one vessel involved, give the range of loads and discharge conditions)		
(i)	Vessel(s) load (tonnes)		
(ii)	Manner of discharge from vessel		
(iii)	Rate of discharge (te/day)		
(iv)	Speed of vessel while dumping (m/s or knots)		
(f)	Amount of material dumped		

(g)	Type of material (%gravel/ sand / mud)	
(h)	Other relevant information (e.g. residual water movements):	

**Dumpsite 2**

(a)	Location	
	Co-ordinates (minimum of 4):	
	Latitude (decimal degrees)	Longitude (decimal degrees)
(b)	Depth (metres)	
(c)	Distance from coast (km)	
(d)	Tidal flows	
	Direction (degrees)	
	Maximum speed (m/s knots)	
(e)	Method of dumping (if more than one vessel involved, give the range of loads and discharge conditions)	
(i)	Vessel(s) load (tonnes)	

(ii)	Manner of discharge from vessel		
(iii)	Rate of discharge (te/day)		
(iv)	Speed of vessel while dumping (m/s or knots)		
(f)	Amount of material dumped		
(g)	Type of material (%gravel / sand / mud)		
(h)	Other relevant information (e.g. residual water movements):		

**Dumpsite 3**

(a)	Location		
Co-ordinates (minimum of 4):			
Latitude (decimal degrees)		Longitude (decimal degrees)	
(b)	Depth (metres)		
(c)	Distance from coast (km)		

(d)	Tidal flows		
	Direction (degrees)		
	Maximum speed (m/s knots)		
(e)	Method of dumping (if more than one vessel involved, give the range of loads and discharge conditions)		
(i)	Vessel(s) load (tonnes)		
(ii)	Manner of discharge from vessel		
(iii)	Rate of discharge (te/day)		
(iv)	Speed of vessel while dumping (m/s or knots)		
(f)	Amount of material dumped		
(g)	Type of material (%gravel /sand / mud)		
(h)	Other relevant information (e.g. residual water movements):		