



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

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1. Introduction

Dumping at Sea permit holders are required to prepare and submit an Annual Environmental Report (AER) 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:

- 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 required contents of the AER are outlined in the AER Schedule and specific conditions within the DaS permit and it should address the previous calendar year. Further detail on AER content is provided in this guidance note.
- The OSPAR dumping report for the relevant year must be included in the AER – refer to Section 4 of this guidance document.
- If items are omitted or not presented in an acceptable manner, the EPA reserves the right to reject the AER report on these grounds.
- A pdf copy of the Annual Environmental Report (AER) and the OSPAR Dumping Report for the previous year shall be submitted via EDEN before the **31st March each year**.
- A separate **EXCEL** version of the OSPAR dumping report should also be emailed (before the **31st March**) directly to the Marine Institute for OSPAR reporting purposes, with all additional files required, as specified in the OSPAR report.

Dumping at Sea permits may require the submission of a Final Environmental Report (FER). This Guidance also applies to/ provides assistance on the preparation of the Final Environmental Report. The date for the Final Environmental Report submission is specified in your permit (i.e. within 3 months of completion of loading and dumping activities) and it differs to the submission date for the AER. The contents of the FER are outlined in the FER Schedule within the DaS permit.

NOTE:

The Annual Environmental Report (AER) is a public document and it will be published on the EPA website. The permit holder must ensure that all information provided is truthful, accurate and complete to their best of their knowledge and belief, and a declaration in this regard should be included with the AER.

2. Cover page and declaration

The cover page of the AER should include the following information;

- a) The reporting AER year (previous calendar year).
- b) The permit number S00XX-0X.
- c) The name of the permit holder and address,
- d) The location of the loading site(s), if applicable.
- e) The location of the dumping site(s).

All above details are specified on the front page of the permit. A cover template can be found [here](#).

A Declaration should be completed by inputting details of the author (e.g. name and position) and ticking the box in the declaration form. The declaration form can be found [here](#). The Declaration form should be included immediately after the Cover page in the AER.

NOTE:

By ticking the box in the Declaration, you are confirming that the information provided in the report is truthful, accurate and complete to the best of your knowledge. In addition, the declaration includes confirmation that all monitoring and performance reporting is available for inspection by the Agency.

3. Summary of Loading and Dumping at Sea Activities

The permit holder should provide a description of loading and dumping at sea activities for the previous calendar year. The summary should include as a minimum the following:

- Period of validity of the permit.
- Details of closed periods.
- Details of exclusion zones (if any).
- Dates/ period when permitted activities occurred during the previous calendar year.
- Quantity of dredge material dumped at sea.
- Location of loading.
- Location of dumping.
- Compliance summary¹ (including non-compliances (if any) recorded during the reporting year).

¹ The summary of “compliance” status should include details of compliance with any turbidity levels at any monitoring location (where relevant) that have been agreed by the Agency, or were proposed in the permit application documentation.

- Any changes to the permit.
- Other relevant environmental improvements and /or additional monitoring completed.

4. OSPAR Dumping Report

The permit holder is requested to include in the AER a completed OSPAR dumping report for the previous year, as required under the OSPAR Convention. The completed EXCEL OSPAR dumping report should be saved as PDF and added to the AER PDF document.

Before the excel template is saved as PDF, check that all data is visible in the cells. The template should be formatted correctly and have all cells sized appropriately so that all text is readable before it is saved as PDF document.

A separate **EXCEL** copy of the completed OSPAR dumping report should be emailed directly to the Marine Institute (margot.cronin@marine.ie) for OSPAR reporting purposes, with all additional files required, as specified in the OSPAR report.

The reporting deadline for the submission of the AER and the OSPAR dumping report, for the previous calendar year, is the 31st of March.

Important:

1. The name of the OSPAR dumping report and subject line of the email to the Marine Institute must read as follows;
Permit holder name, location of loading, S00XX-0X, OSPAR return 20XX.

Please note that the permit holder name, location of loading and permit number, S00XX-0X , are all specified on the front page of the permit. RETURN 20XX refers to the reporting year of the return.

NOTE:

In order to comply with international reporting obligations, Ireland **MUST** report to OSPAR annually with details of all substances dumped at sea. In Ireland Dumping at Sea permit holders are obliged to include their OSPAR return as part of their Annual Environmental Report to the EPA. The OSPAR Dumping Report Template is updated regularly and therefore the permit holder shall ensure that data is reported using the most up-to-date template, which is available [here](#).

5. Register of Loading and Dumping at Sea Activities

Information on loading and dumping at sea activities should be recorded during each dumping voyage, as 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 should be submitted in summary form as part of the AER.

Requirements for bathymetric surveys at the loading areas, plough dredging areas and dumping sites prior to commencement and after completion of the permitted activities may be included as part of the DAS Permit. Maps/ drawings showing the before and after bathymetry as required in the permit, should be included in the AER.

6. Vessel Track Record Data

The vessel track record data 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.

NOTE:

The vessel track record data may include a map/ drawing, however the permit holder must ensure that all relevant information required under the DAS permit is included (i.e. date, time and position of vessel when loading/ dumping began and ended).

7. 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.

An incident is defined, but not limited to (refer to the DaS Permit for site specific definition):

- 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.
- Activation of alarmed turbidity sensors (if relevant).
- In some instances, complaints of an environmental nature.

The permit holder is required to notify the EPA as soon as practicable after the occurrence of an incident via EDEN. Information to be included in the incident notification should include the date and time of the incident, incident details, incident nature, incident location and where available the steps taken to minimise any impacts. A detailed record of all incidents does not need to be included in the AER, but a summary should be included in the AER. A suggested format for the incident summary is illustrated below:

Date & Time	Location of Incident	Incident details (CAUSE)	Impact (EFFECT)	List of Authorities contacted	Corrective action	Success of the corrective action	Incident Closed (Y/N)
DD/MM/YY 00:00 hrs	Identify the place of the incident	Nature, extent 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

NOTE:

Some permits may include “complaints of an environmental nature” in the definition of an incident (refer to the DaS Permit for site specific definition).

8. Complaints Summary

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

- Each complaint record should include details of the date and time and nature of the complaint. The record should include the details of the response made, and the corrective action undertaken. This should be made available to the EPA on request.
- A summary of the complaints is to be included within the AER. A suggested format for the complaint summary is illustrated below:

Date of complaint	Nature of the complaint	Response made to the complainant	Complaint Closed (Y/N)
DD/MM/YYYY	<u>In Brief</u> Location, nature, extent and circumstances giving rise to the complaint.	Summary of response made including corrective and preventative actions put in place (if any)	Y/N

NOTE:

Under GDPR Regulations, no personal data such as personal email addresses, monitoring locations etc. that could identify an individual should be included in this, or other reports submitted to the Agency. The EPA will reject any report that contains personal data.

9. Monitoring Summary

The permit holder should include a monitoring summary within the AER, as per the schedules and conditions of the permit.

Where specific full reports are required to be submitted as part of the AER (refer to DaS permit), a summary of the monitoring should be provided under this section and the full reports submitted as Appendices in the AER. Monitoring reports that may be required to be submitted as part of the AER include, but are not limited to, the following:

- Water Quality Monitoring Report.
- Hydrographic Monitoring Report.
- Sediment Plume Monitoring Report.
- Marine Mammal Monitoring Report.

NOTE:

The monitoring summary should provide a summary of the monitoring results and clearly state whether the permit holder was compliant with the relevant conditions and any emission limit values.

10. Accident Prevention and Emergency Response

The permit holder should, in advance of the commencement of the activities, ensure that documented Accident Prevention and Emergency Response Procedures are in place. The DaS permit may require that these procedures are reported on as part of the AER.

11. Other Items specified by the Agency

The permit holder should review the specific conditions of the permit and the schedules to ensure that all required AER information is submitted. The permit holder shall also submit any other items as specified by the Agency.

NOTE:

Some DaS permits may require the inclusion of a report in the AER on continued investigations into alternative re-use options for dredged material – i.e. alternatives to dumping the dredged material at sea.

12. AER Submission Details

A pdf version of the AER and OSPAR reports should be submitted to the Agency via return on EDEN.

NOTE:

1. The completed AER and OSPAR Reports should be saved as PDF files and uploaded through the EDEN portal as a Return using the following categories:

Document type: Annual Environmental Report

Document Subtype: AER (FER for Final Environmental Reports)

2. The pdf AER file should be named using the following format “**S00XX-0X AER Return 20XX**”; S00XX-0X being the permit number and 20XX the AER reporting year (previous calendar year). For Final Environmental Reports the File should be named “S00XX-0X FER Return 20XX”. If the document is required to be broken down into a number of smaller sized documents, the files should be named using the following format: “**S00XX-0X AER Return 20XX Part X of X**”.

NOTE:

Permit holders should ensure that the AER is clearly legible and formatted correctly. There is a maximum limit on the file sizes for upload to the EDEN portal which is set to **10MB per file**. Saving pdf files as reduced file size pdf's, using compression tools, or reducing the size of any images before converting to a pdf document may reduce the size of the resulting pdf document. If necessary, the permit holder should break up the document into smaller file size documents.

13. Helpdesk Assistant

Queries relating to the EDEN portal can be submitted by email to: eden@epa.ie

If you have any technical queries relating to the content of the AER and/or OSPAR returns, please contact your relevant EPA Dumping at Sea (DaS) inspector.