

11 March 2014

Mr Kieran Doherty  
Executive Officer  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

**Re: Galway Harbour Company, Galway Harbour Extension,  
Direct Application to An Bord Pleanála in respect of a Strategic Infrastructure Development**

Dear Mr Doherty

I refer to the Galway Harbour Company's notice of its intention to make an application to An Bord Pleanála for permission for the development of an extension to Galway Harbour at Renmore and Townparks Townlands and on lands to be reclaimed from the foreshore and sea in Galway Bay.

Inland Fisheries Ireland (IFI) is mandated to ensure that the fisheries of the State are protected. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

Whilst IFI is not opposed to this strategic infrastructure project, it does seek to ensure that the fishery resource is fully protected. Having reviewed the proposal and associated documentation, IFI has the following observations which it requests are borne in mind in relation to the conditions attached to any approval to proceed:

**Galway Fishery:**

IFI had previously expressed concerns that this development will encroach into the zone which is legally an integral part of the Galway Fishery the fishing rights of which are vested in IFI. The two outer markers of the Galway Fishery (dated 1669) seem to have been lost or removed during previous developments undertaken within Galway Bay. The marker located at the existing Harbour Enterprise Park may have been covered over by spoil as part of this development. IFI is anxious to have the location of the marker identified and replaced, and similarly the outer marker which was previously located on Mutton Island. In accordance with the Fishery Consolidation Act, 1959, the mouth of a river is defined by an order under Section 10 of the Fisheries Consolidation Act, 1959. The existing River Corrib mouth boundaries as defined by law should be delineated and an examination of any implications arising from the development should be undertaken.

**Angling Facilities:**

IFI market and promote angling and has invested in developing access routes, including disabled access, bridges and fishing stands for anglers. Currently, spaces for recreational sea fishing in Galway

City are limited due to other public uses of promenade and beach space, shallow water and lack of access. Sea angling within the city boundaries is restricted to shallow water species, such as flounder, and angling for mackerel in the summer months, which is very popular, but due to the aforementioned lack of space leads to crowded piers and angling in unsafe places. The proposed new pier would allow access to a significant increase in usable space, as well as access to deeper water, allowing more species to be targeted. IFI would recommend that public access to the pier be permitted, and that angling is encouraged where it does not interfere with boating or shipping operations. This would constitute a public amenity use, and foster community pride and involvement in the project.

### **Water Quality:**

The EU Water Framework Directive (2000/60/EC) requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. The Western River Basin Management Plan states that the Corrib Estuary's overall chemical status has failed to meet the standard and needs to be restored to at least "good" status by 2021.

IFI would highlight the importance of ensuring that there is sufficient capacity available both within the receiving sewerage network and at Mutton Island waste water treatment plant over the full duration of the project to ensure that the ecological integrity of Corrib estuary is protected.

It is noted that the pollution mitigation measures with regard to construction activities have been largely addressed in the EIS and these are generally acceptable subject to close liaison with IFI Galway should the project be approved.

### **Non-native Invasive Species**

Non-native invasives are species that have been introduced, generally by human intervention, outside their natural range and whose establishment and spread can threaten native ecosystems. Invasive species represent one of the greatest threats to biodiversity, second only to that caused by direct habitat destruction. They do this by competitively excluding or out-competing our less robust native species, by preying on native species or by altering the natural aquatic or riparian habitat in which they become established.

Aquatic Invasive Species (AIS), fish parasites and diseases are readily transferred from one watercourse to another via angling tackle, boats and protective clothing. These can be very damaging to resident fish stocks, the aquatic habitat and the general environment. Invasive species can also adversely impact the recreational and amenity use of infested watercourses, and hence tourism, by restricting angling, boating, swimming and other water-based leisure pursuits. An example of a proactive policy in this regard would be to prohibit invasive species from inclusion in the landscape design proposals. Landscaping proposals etc. should require the use of native species from local stock.

IFI has concerns that the escalation in marine traffic associated with the harbour extension will increase the volumes of ballast water discharged into Galway Harbour. This in turn will increase the risk of introducing non-native species to the estuary which could cause extensive ecological and economic damage to the aquatic ecosystem. It is noted that Section 7.7.4.18 of the EIS states that Harbour Company will implement an Environmental Management Plan and policy regarding handling of invasive alien species. IFI requests that it is included in the EMP as a notifiable body should any invasive species be detected.

### **Increased Seal Predation:**

Section 7.7.6.16 of the EIS states that the design of the proposed harbour construction with steel sheet pile to act as a toe for the rock armour will create a steep drop into the water and thus mitigate against the possibility of seal haul out areas being created in this area. Whilst this design may ensure that no

additional seal haul out areas are created, IFI still has concerns that the narrowing of the channel will increase the likelihood of seal predation on migrating salmonids and may also render migrating smolts more vulnerable to predation by aquatic birds.

Observations by IFI personnel over the years would indicate that there are a greater numbers of seals present at the estuary than was observed during the seal study undertaken as part of the EIS. Indeed anglers and IFI staff have reported sporadic sightings of grey seals as far upriver as the Galway Weir during the summer months. A large proportion of the salmon caught by anglers within the Galway Fishery also exhibit claw marks associated with seal predation.

The proposal to monitor the seal populations prior to, during, and for at least two years post construction is welcomed by IFI. However, should it emerge that the rate of seal predation increases as a result of the new layout of Galway Harbour, consideration may have to be given to the introduction of some mitigation measures such as an acoustic deterrent device at the mouth of the river.

**Elver Migration:**

There are concerns that the proposed harbour extension may obstruct the upstream migration of elvers, as they typically return to the River Corrib via the coastline. Indeed, existing structures such as the causeway out to Mutton Island may already be interfering with eel migration.

IFI would recommend that a monitoring programme is initiated pre construction (April/May) to determine the existing migration pathways utilised by migrating elvers entering the River Corrib. Should it emerge that the elver's migration route could be hindered by the proposed harbour extension, an ongoing emergency recovery programme and elver transportation programme will need to be implemented. It should be borne in mind that stocks of European eel (*Anguilla anguilla*) are at a dangerously low level Europe wide which has led to the introduction of a complete ban on fishing for this species in Ireland and, as such, every protection should be afforded the recovery of this native fish species.

**Lough Atalia:**

As per the concerns expressed in relation to elver migration, and also to reduce the likelihood of poaching, IFI would recommend that a fish monitoring programme is implemented during and post construction to ensure that the frequency of returning salmonids entering Lough Atalia rather than travelling straight up the River Corrib does not increase as a result of the harbour extension.

IFI requests an acknowledgement from An Bord Pleanála of receipt of this submission.

Yours sincerely

  
John Conneely  
Director