

YOURVIEW

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Simply put, this legislation and the relevant CA in Ireland, the EPA were not mentioned in the Q&A section by either Departments. Yet it is highly relevant to the proposed Dalkey project.

Ireland's coastal waters, including Dublin and Killiney Bays, are covered by Community water management legislation¹ (Water Framework Directive), while there are specific parts of Dublin Bay that fall under both the 'Birds' and 'Habitats' directives.

In addition, petroleum drilling is a dangerous activity (defined in Annex III of the Directive on Environmental Liabilities) for which strict liability rules apply, i.e. the operator is fully liable for the environmental damage listed above.

Note: This is different to the maritime transportation of petroleum fluids, for which over four million tonnes per annum enter Dublin Bay each year, as ship owners only have liability under existing conventions to a specified financial sum. The State is liable for the additional costs.

In practice, if an incident were to occur, Providence Resources would carry the full financial costs; the State's oil spill contingency plans would likely to be mobilised, as they are already in place, and the costs transferred to Providence.

The Environmental Liabilities Directive is clear in that the CA can assume full control of the situation at any time, both in relation to preventative and remedial measures. Therefore, the principles contained in *Inshore Ireland* (Feb/March) described by Providence in their Resources Oil Spill Contingency Plan are in fact correct, although under the legislation above, the CA is the EPA and not the Coastguard.

Finally, it is not only a shame that while appropriate EU legislation is in place, (which neither the Department officials nor the citizen are aware of) there is also a fundamental legal duty on the authorities to actively and systematically disseminate environmental information.

One can only conclude that in this case, the authority responsible for its implementation, the EPA, cannot be bothered. Sadly this casual attitude is depriving both the citizen of his/ her right to participate in the process and the developer the assurance that the public in the environment he is operating, will be correctly informed of the standards that are in place regarding the prevention and remedying of environmental damage.

PAT SWORDS

**GLENAGEARY,
CO DUBLIN**

Waste not, want not: Should Dublin City Council be allowed to plunder the River Shannon?

Gerry Siney,
Shannon Protection
Alliance

In anticipation of growing water requirements of the greater Dublin Area (GDA), Dublin City Council (DCC) is proposing to source its future supply from the River Shannon for piping to Dublin for domestic, commercial, and industrial consumption. The River Shannon Protection Alliance (RSPA) www.shannonprotection-alliance.ie with branches in Athlone, Tipperary (Dromineer), and Limerick is the lead organisation opposing this need-less and high risk scheme.

The DCC plan proposes to abstract water at a rate of upwards of 500 million litres per day (MLD). This of course is but the thin edge of the wedge, and the realist will be in no doubt that this level of extraction will increase exponentially year-on-year.

It will be a case of a bit more next year and the year after, and the year after that again. In the words of environmental scientist, Jack O'Sullivan, "International experience shows that large-scale abstraction from river systems worldwide has generally been followed by ecologically and socially destructive and irreversible consequences."

LEAKAGE, NOT SHORTAGE

The current rate of leakage of the Dublin supply system is 30%, which means of course that one-third of Shannon water would be wasted, against a backdrop of no real programme in place to fix these leaks.

We are told there is no money available, but oddly, half a billion Euros can be found to construct a pipeline. Even if the proposal were to gain approval, DCC would seem content to waste some 160 million litres of supply and consumer side water daily. The plan proposes at some undefined date in the future to reduce leakage to 20% – hence the 160 MLD leakage in perpetuity. Yet a reduction

to 15% would yield savings in excess of 100MLD per day. Some cities in Europe have leakage down to 5% and 6%, and cities in Japan have achieved a rate of 3%.

If these proposals are allowed to proceed, yes DCC will be able to continue to attract foreign direct investment (FDI) for Dublin and its runaway expansion of satellite towns and commuter belts. The RSPA does not wish to place limits on the promotion of the capital's legitimate interests; however under Shannon abstraction proposals, the regions will pay a high and unsustainable cost economically and socially, and the Shannon and its tributaries will suffer ecologically and environmentally.

Economically, the regions along the length of the river – from the Shannon Pot to the Shannon Estuary (18 local authorities), and indeed the hinterland communities – depend on a healthy water course for their very livelihoods and standard of living.

RISKS OF EXTRACTION

Historically, people and organisations have invested time, effort and financial resources developing tourism, hospitality facilities, shipping,

social, recreational, and educational enterprises, and any significant drop in the levels and flow of the river could put these businesses and industries at risk of non-viability. No-one has a right to take this away from those who worked hard to put it in place – merely at the stroke of a pen.

The ecosystem of the Shannon is fragile one, supporting countless aquatic and non-aquatic forms of life, and contains a significant number of vulnerable and important Natural Heritage Areas (NHAs), Special Areas of Conservation (SACs), and Special Protection Areas (SPAs) for wildlife, and these designated areas and their unique flora and fauna would be at risk from excessive abstraction of water. These considerations have been given scant regard in DCC's proposal.

PROFLIGATE WASTAGE

The Greater Dublin Area (GDA) is not at risk of running short of water. There is no shortage now, and there needn't be in the future. There is on the other hand a problem of profligate wastage, lack of conservation and demand reduction measures, and a lack of emphasis on recycling and use of grey

water usage measures.

These alone would be enough to result in an immediate savings in excess of 100-150 MLD on a permanent basis. If a new source of supply were really needed, DCC should go back to the drawing board and re-examine (properly this time) the very ample availability of untapped water which exists closer to home. Potentially large groundwater resources in Counties Fingal, Meath and Kildare are estimated to sustainably yield over 100 MLD of high quality water. Desalination (on Dublin's doorstep) should also be revisited. New technology such as Reverse Osmosis is making this process more and more economically affordable.

A combination of these practical options if seriously implemented would provide the GDA with a surplus of water for many years to come. Placing pipes into the Shannon is the 'soft option' for the DCC, which allow it pump and leak and waste away in a continuance of grossly out-of-date water use practices.

DCC's proposal in its current form represents Victorian Era technology for a 21st Century problem.



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Photo G Mills