

Fiona Marshall
Secretary to the ACC
UN Economic Commission for Europe
Palais des Nations
1211 Geneva 10
Switzerland.

23rd June 2021

Re: Communication concerning compliance by Ireland with articles 5 and 6 of the Convention with respect to Dumping at Sea Permits (ACCC/C/2016/139)

Dear Fiona,

Diving Ireland is still working towards providing answers to the questions to the communicant raised in your letter of 26 March 2021. Questions 6, 7, and 8 all sought information on documents on the EPA website, and if the documents were not available on the EPA website, then to seek copies from EPA regional offices. There are a number of documents requested by the ACCC that are not available on the EPA website. However, unfortunately, due to the Covid 19 situation, all EPA offices are currently closed to the public. Therefore, Diving Ireland formalised the access to documents from the EPA via an Access to Information on the Environment (AIE) request.

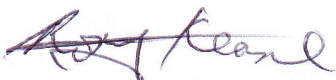
Question 6 asked *"For which of the permits in the Dumping at Sea Register issued since September 2012 have loading and dumping activities been carried out but the required two-week notice before commencing activities are not available on the EPA website?"* Review of the Dumping at Sea (DAS) register indicated that there were twenty permits for which commencement letters were not available on the EPA website. These commencement notices constituted items 1 to 20 of the AIE request. The EPA responded to this request in a letter of 2 June 2021 stating that *"In particular items 1 to 20 of your request are too broad and voluminous. Please note that each permit holder may have sent us several commencement notifications since they were issued permits by the EPA. In addition, the EPA only has hard copies of these commencement notifications prior to November 2016. So unfortunately, we will only be able to provide you with access to the pre-November 2016 notifications when the current Covid 19 restrictions are lifted. In the meantime, you could confine your request to after November 2016 and to the last notification received by the EPA."*



Diving Ireland confirmed that it was requesting all notifications since September 2012. The EPA has now advised Diving Ireland that *"it is necessary to extend the period for consideration of your request by one month. The reason for this extension is because of the volume of the records involved which exceed more than 100 pages and to allow us time to asses [sic] these records. This is based on Article 7(2)(b) of the Regulations, which permits an extension of up to one month due to the volume or complexity of the environmental information requested. This means that you can now expect to receive your decision by 19 July 2021."*

Diving Ireland therefore anticipates that it will be able to fully address the questions raised in the letter of 26 March 2021 towards the end of July 2021. We apologise for the delay in the response, but obviously the Covid 19 situation has hampered the ability to physically review EPA documents located in regional offices.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rory Keane', with a small dot at the end.

Rory Keane

Company Secretary

Diving Ireland.