

**Devon and Severn IFCA response to Combwich Wharf Activity Details,  
MLA/2012/00259/5.**

**Adequacy of the Method Statement**

Devon and Severn Inshore Fisheries and Conservation Authority (D&S IFCA) has some concerns relating to the adequacy of the Method Statement provided regarding the works at Combwich Wharf. The main concerns for D&S IFCA pertain to the fish species that comprise the estuarine fish assemblage sub-feature of the Severn Estuary EMS, including the stretch of the River Parrett affected by the Combwich works. The Parrett estuary is a proposed Bass Nursery area, and juvenile sea bass are known to move upstream into river systems.<sup>1-3</sup> This highlights the potential for this (and other) euryhaline species from the Severn Estuary EMS assemblage to be affected by pollution events in the vicinity of the Combwich works.

Specifically, during the preparation works (pages 10 – 11 of document HPC-OH7102-CW-000-PLN-100015) it is not made clear if the excavation of the unreinforced concrete slab and subsequent infilling with granular fill material will cause some material to be exposed to the effects of the tide. For example, on page 11, the methods statement includes the following: “Excavated material from the slab breakout or substrata may be left in the berth bed overnight if cranage is not possible due to wind etc.”. It appears that this material would be exposed to the effects of the tide and may be washed away. The potential effects of this on the environment are not considered. We recommend that the methods are changed or clarified to show how this will be prevented.

In addition, on page 11 of the methods statement (document HPC-OH7102-CW-000-PLN-100015), it is stated that “A suitable aquatic use release agent, i.e. mould oil, or impermeable separator layer will be used”. However, the details of this are not provided in the COSHH statement, and the effects on the environment are not considered. More detail would be appreciated on the agent to be used, the quantities required and its potential effects on the environment – and how these will be prevented or mitigated. The concrete mould release oil included in the COSHH assessment is toxic to aquatic life with long lasting effects, but it is not made clear how the release of this substance into the environment will be prevented.

D&S IFCA hope the points raised here will be considered during the forthcoming process and used to ensure as far as possible that pollution events are minimised and controlled.

**References**

1. Devon and Severn Inshore Fisheries and Conservation Authority (2016). Devon and Severn IFCA's response to the Defra call for evidence and impacts for new and existing Bass Nursery Areas.
2. Barnabé, G. (1989). L'élevage du loup et de la daurade. in *Aquaculture*, vol. 2 (ed. Barnabé, G.) 657–720 (Lavoisier Technique et Documentation).
3. Devon and Severn Inshore Fisheries and Conservation Authority (2015). European Sea Bass (*Dicentrarchus labrax*) in the Inner Severn Estuary (including South Gloucestershire and Gloucestershire).