

## Note / Memo

**Haskoning UK Ltd.**  
**Water & Maritime**

To: Marine Management Organisation  
From: Haskoning  
Date: 22 August 2025  
Copy: PD Teesport Ltd  
Our reference: PC6304-RHD-XX-XX-ME-X-0001  
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**Subject: Responses to the Tees and Hartlepool Maintenance Dredge Disposal  
public consultation representations (MLA/2025/00263)**

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## 1 Introduction

This note provides PD Teesport Ltd's responses to the public consultation representations received by the Marine Management Organisation (MMO), for the Tees and Hartlepool Maintenance Dredge Disposal Marine Licence Application (MLA/2025/00263).

Table 1 PD Teesport Ltd - Consultation Responses

Reference	Comment	PDT Response
<b>Public Representation 1</b>		
1	<p>I am writing to strongly object to the renewal of the maintenance dredge disposal licence L/2015/00427/7 for the Tees and Hartlepool area, which proposes a 10-year licence from January 2026 to December 2035.</p> <p>Many members of the public, local fishers, environmental experts, and marine conservation groups are deeply concerned about the environmental and ecological impacts of continued dredge disposal in this area. These concerns are based on the following serious issues:</p> <p>Crustacean die-offs and suspected contamination Since October 2021, mass shellfish deaths have occurred along the North East coast, including in Teesside, Hartlepool, and as far as Whitby. Crabs and lobsters were found twitching and dying in large numbers. Local fishermen have reported up to 95% declines in catches—an event with devastating effects on local livelihoods and marine biodiversity.</p> <p>While official reports claimed algal blooms were likely responsible, independent scientists and local observers continue to believe that dredging and the dumping of potentially contaminated sediments may be contributing to the damage. Pyridine, a toxic industrial chemical, was found at elevated levels in crab tissues. Yet no full explanation has ever been reached, and no resolution has been offered to impacted communities.</p>	<p>Following a multi-agency investigation<sup>1</sup> into the north-east crustacean die off event, an expert panel was convened consisting of experts from academia and industry with a range of knowledge and experience spanning crustacean biology, marine eco-toxicology, sea-life histology/pathology, marine pollutants, algal blooms, chemical dispersion in the oceans, sediment and water chemistry, dredging, and coastal processes. The panel concluded<sup>2</sup> that maintenance dredging, and specifically the disposal of maintenance dredge materials (the subject of this marine licence renewal application by PD Teesport Ltd) were 'very unlikely' to have contributed to the unusual crustacean mortality events.</p> <p>Further scientific studies have also been published which concludes that pyridine is not the cause of the mass mortality event (Ford <i>et al.</i>, 2024<sup>3</sup>).</p>
2	<p>Toxic sediment and unclear disposal practices The Tees estuary has a long history of industrial pollution. Dredging in this area may disturb toxic sediments, including heavy metals and industrial chemicals such as pyridine. Disposing of this material at sea without thorough and independent chemical analysis may be putting the entire marine food web at risk.</p> <p>Fishermen have expressed concern that dredged sludge is being dumped at sea</p>	<p>The marine licence application is for a renewal of the ongoing disposal of maintenance dredged materials from within the Ports of Tees and Hartlepool. PD Teesport Ltd has the power to carry out dredging of the River Tees under the Tees and Hartlepool Ports Authority Act 1966.</p> <p>PD Teesport Ltd complies with all conditions placed on it by the MMO when a maintenance dredge disposal licence is issued which provides for periodic</p>

<sup>1</sup> <https://www.gov.uk/government/publications/joint-agency-investigation-into-teesside-and-yorkshire-coast-crab-and-lobster-mortalities>

<sup>2</sup> Crustacean Mortality Expert Panel. 2023. Independent Expert Assessment of Unusual Crustacean Mortality in the North-east of England in 2021 and 2022. <https://www.gov.uk/government/publications/assessment-of-unusual-crustacean-mortality-in-the-north-east-of-england-in-2021-and-2022>

<sup>3</sup> Alex T. Ford, Mark F. Fitzsimons and Crispin Halsall. 2024. Why there is no evidence that pyridine killed the English crabs. <https://pubs.rsc.org/en/content/articlepdf/2024/va/d4va00006d>

Reference	Comment	PDT Response
	<p>when it should instead be disposed of on land under strict safety measures. Continuing to allow this dumping for another decade without proper scrutiny could further harm wildlife and public trust.</p>	<p>sediment sampling and testing throughout the lifetime of the licence to ensure that the material disposed of is suitable for disposal at sea. It is for the relevant licencing bodies to stipulate the required sampling protocol.</p> <p>Sediment sampling was undertaken in line with the sample plan provided by the MMO on the 20<sup>th</sup> July 2024 (SAM/2024/00054). This sampling was conducted as part of the previous disposal licence (MLA/2015/00088) and were approved for the continuation of disposal activities by the MMO and Cefas. Conditions 5.2.3 and 5.2.9 were subsequently discharged by the MMO.</p>
3	<p>Lack of an independent Environmental Impact Assessment (EIA) The application appears to rely mainly on the Tees Maintenance Dredging Protocol (MDP) Baseline Document. However, there is no indication that a full, transparent, and independent EIA has been carried out for this renewal. A licence of this length and scale—covering daily dredging and dumping over 10 years—must be based on robust environmental evidence and transparent public consultation.</p> <p>Any sediment proposed for disposal must be tested for industrial contaminants, including pyridine. Without this, there is no way to assess the full risks to the marine environment, fisheries, or public health.</p>	<p>A marine licence application for the disposal of sediment to sea is not subject to the requirements of the Environmental Impact Assessment (EIA) Directive or UK EIA regulations. The Marine Dredge Protocol (MDP) Baseline document includes the required environmental assessments to appropriately assess receptors within the boundaries of the activity.</p> <p>As outlined in the MDP Baseline document, “Maintenance Dredging and the Habitats Regulations 1994, <i>A Conservation Assessment Protocol for England</i> (referred to as ‘the Protocol’ hereafter) was published by the Department for Environment, Food and Rural Affairs (Defra) in 2007. The Protocol sets out an approach for operators and regulators to provide a MDP Baseline document to present existing and readily available information to describe the current and historical patterns of dredging in relation to the conservation objectives of a site which is part of the National Site Network. The Protocol aids operators and regulators seeking or giving approval for maintenance dredging activities that could potentially affect sites which are part of the National Site Network. Following this process enables the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) to be addressed in a streamlined and proportionate manner, assisting harbour and port authorities in fulfilling their statutory obligations, and minimising the delay and cost to port and marine operators in obtaining consents.</p> <p>The presumption in assessing any potential consequences of maintenance dredging activity is that dredging will continue in line with the established practice. The baseline document also presumes that existing practice is part of the functioning of the existing system given the timeframe over which it has occurred and continues to occur.”</p>

Reference	Comment	PDT Response
		As above, sediment sampling and analysis has been undertaken in line with the sample plan provided by the MMO on the 20 <sup>th</sup> July 2024 (SAM/2024/00054).
4	<p>Calls for precaution and protection</p> <p>Given the scale of previous ecological impacts, the uncertain cause of crustacean die-offs, and the lack of transparency around sediment testing, I ask that you adopt a precautionary approach.</p> <p>Before any licence is renewed:</p> <p>All dredged material should be thoroughly tested for industrial toxins, including pyridine and heavy metals.</p> <p>Disposal at sea should not be permitted unless the material is proven to be non-toxic.</p> <p>An independent Environmental Impact Assessment must be conducted and published for public review.</p> <p>Ongoing environmental monitoring and real-time reporting must be part of any dredging programme.</p> <p>Full consideration must be given to the voices of local communities and fisheries, who have already suffered huge losses.</p>	See previous response to point 1 of this representation.
5	<p>This decision will shape the health of the Tees estuary and the wider North Sea coastline for the next decade. The marine ecosystem, fishing livelihoods, and public confidence in environmental protection all depend on responsible, science-based decisions.</p>	Noted.
<b>Public Representation 2</b>		
1	<p>I am writing to express serious concerns about the proposal to renew the dredging licence L/2015/00427/7.</p> <p>I have noted for some years the unexplained deaths of crustaceans in the area that seems to be linked to dredging and dumping of potentially toxic sediments. The Tees is known to have toxic sediments and it's entirely possible if not probable that disturbing and dumping these layers is responsible for the mass deaths of crabs and lobsters. It is also likely that other sea life is being harmed. Our seas are already in a precarious state and should not be stressed further.</p>	See previous response to Public Representation 1 point 1 on this point.
2	<p>The precautionary principle should be applied and the license should not be renewed until a full and independent environmental impact assessment that demonstrates no</p>	See previous response to Public Representation 1 point 3 on this point.

Reference	Comment	PDT Response
	risks has been completed. The risks to sea life, the fishing industry and humans should not be underestimated.	
<b>Public Representation 3</b>		
1	I object to the renewal of the dredge license. Dredging is known to be deadly to sea wildlife, in this case mostly crabs and lobsters and it is time for this practice to end, or at the minimum for there to be a full environmental assessment carried out and proper decisions to be based on the conclusions of that.	See above response in Public Representation 2 point 2 on this point.
2	I am also concerned about the dumping of the sediment gathered as a result of the dredging process as there is known historical industrial contamination in this area that is harmful to wildlife. There needs to be detailed chemical analysis and environmental assessment undertaken before any consideration is taken towards any possible decision to consider dredging in this area. It is time to put the health of our oceans before short term financial profit.	Sediment sampling was undertaken in line with the sample plan provided by the MMO on the 20 <sup>th</sup> July 2024 (SAM/2024/00054). On review by MMO and Cefas, their scientific advisors, it was determined that the sediments were suitable for disposal at sea.
<b>Public Representation 4</b>		
1	<p>Covering Note</p> <p>Most Important Restrictions and Recommendations for the Dredging Licence:</p> <p>Eliminate or severely restrict overspilling during dredging operations. Trailing Suction Hopper Dredgers (TSHDs) are considered the least suitable for contaminated rivers like the Tees due to sediment dispersal and mixing. Overspilled material is more contaminated due to the concentration of hydrophobic contaminants (like PAHs and PCBs) on finer particles.</p> <p>Mandate enhanced and consistent sediment analysis and sampling. More frequent analyses for PAHs, PCBs, and Brominated Diphenyl Ethers (BDEs) are needed. Sampling must be performed before, during, and after dredging operations, with specific limits set on contamination spread. Crucially, analysis should consider the surface area of sediment particles, not just overall weight, as contaminants adsorb onto smaller particles.</p> <p>Adopt a precautionary and beneficial environmental management approach. This requires urgently exploring technologies for extracting dredged material without spillage and depositing it in lined landfill sites, rather than offshore redistribution. A full-scale Beneficial Use of Dredged Material (BUDM) Program should be</p>	PD Teesport Ltd defers a response to the MMO as the regulator.

Reference	Comment	PDT Response
	<p>commissioned, initially focusing on clean sand from outer channels for beach nourishment or construction.</p> <p>Re-evaluate the continued use of TSHDs in historically contaminated, silty upper reaches of the estuary (e.g., Billingham Reach). More precise, lower-dispersal dredging methods (e.g., environmental clamshell or auger dredgers) should be explored for targeted "hotspot" management.</p> <p>Implement an Adaptive Turbidity Monitoring Program. This necessitates real-time turbidity and Total Suspended Solids (TSS) sensors (upstream and downstream) linked to pre-agreed, tiered trigger levels (Alert, Action, Stop-Work) to allow real-time operational adjustments.</p> <p>Formally adopt an Annual Calendar of Ecological Sensitivity. This comprehensive, risk-based tool would consolidate all known ecological sensitivities into a colour-coded system to proactively schedule dredging campaigns, minimising conflicts with critical wildlife periods such as harbour seal pupping season (June-July) and peak waterbird feeding times.</p>	
2	<p>Covering Note</p> <p>Significant Errors and Concerns in the Licence Renewal Documents:</p> <p>"Providential" rather than precautionary approach: The licence application assumes existing practices are acceptable due to long-term occurrence, despite significant environmental damage such as the mass crustacean die-off in 2021 and high mortality of harbour seal pups.</p> <p>Incorrect application of Marine and Coastal Access Act 2009: The application incorrectly states that PD Ports meets the exemption within Section 75 for sea disposal, as the Tees Inner disposal site (Tees Bay 'A' TY160) is not classified as "surface waters" but rather the North Sea, governed by international conventions.</p> <p>Inadequate assessment of overspilled material: The environmental impact assessment in the renewal documents fails to consider the up to 25% of dredged material that is released as overspill back into the river at dredge sites. This overspill, enriched with fine particles, carries a greater fraction of adsorbed contamination.</p> <p>Inconsistent and insufficient sediment data: The reliance on limited, inconsistent data sets with missing fundamental measurements (e.g., total organic carbon, PCBs, BDEs) makes objective comparison and understanding of the system impossible. Samples are often taken from the surface and may not be representative of the underlying dredged material. The number of samples is insufficient to comply with OSPAR guidelines given the geographical spread and volume of material.</p>	<p>PD Teesport Ltd defers a response to the MMO as the regulator to the points raised in the covering note.</p> <p>Regarding Section 75 of the Marine and Coastal Access Act 2009 (as amended), the MDP document clearly states: <i>"The marine licence, however, only permits disposal to sea because PD Teesport Limited, as a statutory harbour authority, meets the exemption within Section 75 of the Marine and Coastal Access Act 2009 relating to dredging activities."</i> Disposal of dredged materials at sea falls out with the remit of Section 75, and as such, PD Teesport Ltd have applied for a renewed marine licence from the MMO to allow for the continuation of long-term maintenance dredging disposal activity at the established licenced Tees Bay A disposal site.</p>

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	<p>Elevated contamination levels: Tees sediments, particularly in overspill, show significantly elevated PAH and BDE levels compared to other ports like Southampton, indicating a persistent pollution source.</p> <p>Over-simplistic plume modelling: Current modelling is over-simplified, ignoring the significant volume and highly contaminated nature of overspilled fine particles, and the continuous, chronic pressure of maintenance dredging across fragile habitats.</p> <p>Concerning sampling recommendations: Recommendations to reduce sampling frequency based on a single "good result" are concerning, given the high variability in contamination and ongoing development activities in the Tees region.</p> <p>NEMRG stresses the urgent need for a shift from a "waste disposal mindset" to one of "resource management" and genuine environmental leadership, ensuring sustainable growth for the River Tees.</p>	
3	<p>Representation <i>Summarised in the cover letter.</i></p>	PD Teesport Ltd defers a response to the MMO as the regulator.
4	<p>Environmental Best Practices <i>Summarised in the cover letter.</i></p>	PD Teesport Ltd defers a response to the MMO as the regulator.
5	<p>Sediment Quality Investigation <i>Summarised in the cover letter.</i></p>	PD Teesport Ltd defers a response to the MMO as the regulator.
<b>Cefas</b>		
1	<p>Major Comment (Action): The Applicant name application number dates and location as well as dredge area tonnages are omitted, these should also be provided in the MMO template for use with the Cefas Action Level Viewer and for use by the MMO in providing accurate annual disposal returns. In addition, this helps efficient assessment and interpretation of data without introduction of things like transcription error. The locations listed are in Eastings and Northings and should be converted to decimal degrees for WG S84 as required by the template. This should be rectified but should not necessarily prevent or delay a licensing decision being made.</p>	Sediment analysis result tables have been updated and submitted to the MMO following a separate 'Request for further Information (Rfi)' on MCMS following Cefas' comment.
<b>Environment Agency</b>		
1	<p>Eels Regulations - Advice to Applicant Under Regulation 17(4) of the Eels (England and Wales) Regulations 2009, on or after 1 January 2015, a responsible person must ensure an eel screen is placed in a diversion structure that: 1. is capable of</p>	This marine licence renewal application is for the disposal at sea of maintenance dredged materials only, not dredging, therefore comments relating to the eel regulations are not considered to be applicable.

Reference	Comment	PDT Response
	abstracting at least 20 cubic metres of water through any one point in any 24-hour period; or 2. returns water to a channel, bed or sea.	Regardless of this, we do not consider dredging to be an abstraction activity as per the regulations.
<b>NEIFCA</b>		
1	However, we are concerned about the elevated levels of BDE209, BDE99, and BDE100 at some of the sites. While we acknowledge that, in the absence of Total Organic Carbon (TOC) data, PBDE results cannot be normalized, we strongly recommend re-testing these sites with the TOC analysis prior to the issuance of a new licence. Furthermore, we recommend exploring alternative disposal methods for these sites should contaminant levels be found to exceed acceptable thresholds.	<p>Sediment sampling was undertaken in line with the sample plan provided by the MMO on the 20<sup>th</sup> July 2024 (SAM/2024/00054). On review by MMO and Cefas, their scientific advisors, it was determined that the sediments were suitable for disposal at sea.</p> <p>The sediment samples were submitted with TOC data for normalisation of PBDE on 6<sup>th</sup> February 2025 as per Condition 5.2.9 and discharged on 1<sup>st</sup> April 2025 by the MMO.</p>
<b>MMO North Shields Coastal Team</b>		
1	A Fisheries Liaison and Coexistence Plan must be submitted to the MMO at least six weeks prior to the commencement of licensed activities. The plan must include details of the Fishery Liaison Officer (FLO) and Commercial Fisheries Working Group (CFWG). No activities can commence until these plans have been authorised by the MMO.	Disposal of maintenance dredged material is a long term ongoing activity by PD Teesport Ltd. Therefore we question why such a requirement would be necessary given the long standing nature of these activities.