

Stan Rennie

19/12/22

North East Fishing Collective Member.

To: Marine Management Organisation

Tees Freeport Dredging Licence granted by the MMO

**Tees Freeport Dredging Licence Variation reference:
PC1084-RHD-SB-EN-NT-EV-1137**

**Classification: Project related Subject: MLA/2020/00506/2
South Bank Quay Marine Licence**

**OBJECTION TO THE DREDGING LICENCE APPLICATION -
VARIATION MLV2**

**Offshore disposal MLV2 applies for an additional
231,000m3 of dredged material to be disposed offshore**

South Tees Developments Limited (STD L), otherwise known as 'Teesworks', are in the process of constructing a new quay at South Bank on the River Tees (South Bank Quay'). The original marine licence was made by the Marine Management Organisation (MMO) on 17th December 2021 (L/2021/00333/1) and included activities for the demolition of existing structures, capital dredging of a new turning circle, capital dredging of the channel and berthing pocket, and placement of a rock blanket.

A previous marine licence variation request to amend the dredging methodology, dredge depths, dredge areas and include an additional activity for enabling works (to facilitate access to and from South Bank Wharf) was determined by the MMO on 26th August 2022 (L/2021/00333/2). The current (second) marine licence variation request (referred to as 'MLV2') relates to a

proposed increase to the capital dredge and disposal volumes OF AN EXTRA 231,000 Tonnes, of OSPAR Material.

This variation application, to facilitate removal of the material between the existing OSPAR line¹ and line of the new quay wall together with minor corrections identified after determination of first marine licence variation request (herein referred to as 'MLV1'). The material between the existing OSPAR line and the line of the new quay wall is herein referred to as 'OSPAR material'.

Point 1- Objection- Various Toxic Substances, Harmful to Marine Life and Marine Ecosystems- Sediment Testing Results are too high to Consider the Dredge Being Dumped at Sea.

Point 2- Objection- There are substances harmful to the Marine Environment, have not been tested for, therefore there is a potential to cause a detrimental collapse or change to the Marine Life and Ecosystems, it is not just possible, but HAS POSSIBLY ALREADY HAPPENED, with the numerous Mass Wash Ups of dead and dying Marine Life, OCCURRING since the Freeport Dredge began 1st September 2022. See reports and additions reported to the EA/MMO, EA Hotline, Incident number 2110411

Point 3- Objection- There should be ADEQUATE TESTING undertaken, and a map of potential harmful toxic substances, that could detrimentally affect the Marine Ecosystem, tested for, and produced throughout the areas in the Licence dredge and variation areas, sampled in proximity, and sufficient samples taken and tested independently. Example- Pyridine, BEFORE any Variation is considered, and before further dredging in the Licence

continues. Then the variation, then the Licence Dredge, considered safe to dump at sea, or be taken to Landfill

Testing results:-

TESTING UNDERTAKEN FOR LICENCE VARIATION, MLV2,
Noted ion the Licence Variation MLV2, APPLICATION

2022 17 November 2022 PC1084-RHD-SB-EN-NT-EV-1137
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• Heavy metals and organotins: o Nickel (47.3mg/kg in the 2019 samples, **HAVE INCREASED TO 48.4mg/kg in the 2022 samples**)

Lead 296.0mg/kg in the 2019 samples, **HAVE INCREASED TO 573.0mg/kg in the 2022 samples**

The average and maximum **nickel (Ni) concentrations exceeded AL1,**

Other metals with maximum concentrations that exceed the respective AL1 thresholds include Arsenic (Ar), Cadmium (Cd), Chromium (Cr) and Zinc (Zn).

The maximum concentration of Zinc (Zn) in the 2022 **samples exceeds the AL2 threshold for that determinand.** The variation application comment, that this exceedance above AL1 and above the AL2 threshold, 'Has been mitigated through a commitment to dispose of sediment to land where the sediment is at a location within identified 'hotspots' of AL2 exceedances'

Point 4- Objection- **The Comment, nor mitigation measures are NOT acceptable. There is not proof that testing carried out, covers all potential locations of sediment exceeding AL2 and AL1 Nor mitigates FURTHER AL2 Thresholds being reached outside of the OSPA Material test points used.**

Point 5- Objection- There are no references to any 3rd Parties being contacted to this Licence variation application, for Comments, Objections OR Concerns- have any 3rd Parties been contacted?

Point 6- Objection- There is no reference to the 'Die Off/Marine Mortalities Incident' in the Variation (Or Licence) Application, or of the Potential to have been caused by TOXIC dredging being dumped at sea, beginning at the Exact time of the ORCA Dredge beginning.

Point 7- Objection- There is not any reference in the variation Application (Or Freeport Dredge Licence) Environment Impact Statement, of the 'Die Off Incident, or of the Potential of the Die Off's, to have been caused by TOXIC dredging being dumped at sea, - *beginning at the Exact time of the ORCA Dredge beginning.

Point 8- Objection- There is not any reference in the MLV 2 Method Statement, (Or Freeport Dredge Licence) of the 'Die Off Incident, or of the Potential to have been caused by TOXIC dredging being dumped at sea, beginning at the Exact time of the ORCA Dredge beginning.

Point 9- Objection- There is not any reference in the MLV2 Variation application Risk Assessment, (Or Freeport Dredge Licence) of the 'Die Off Incident, or the Potential to have been caused by TOXIC dredging from the Tees, being dumped at sea. *Die off beginning at the Exact time of the ORCA Dredge beginning.

Point 10- Objection- There are not ANY MITIGATION MEASURES PUT IN PLACE, in the Variation (Or Original Freeport Dredge Licence) Application, if the potential that the Dredge Material, contains Harmful substances not found in limited testing point number points, subsequently causes harm to the Marine Environment OR Ecosystem- NONE!

With correct testing and toxic, harmful material identified, and taken to landfill, A DIE OF/MARINE MORTALITIES incident can be stopped- IT CAN NOT BE STOPPED AFTER IT HAPPENS- like we have already seen in the non-stop period from the ORCA Dredge onwards

Point 11- Objection- The EFRA Committee recommendations to the MMO, Dated 1st November,

HAVE THEY ALL BEEN UNDERTAKEN?, IF NOT WHY?

The EFRA Committee recommendations to the MMO, 'segments' include: -

11a- 'The MMO must urgently review the dredging activity in the Tees'- Before considering the variation- WHAT HAVE THE MMO DONE TO REVIEW THE INSTRUCTION?

11b- The EFRA Committee Recommendation, included, 'the MMO explore, in line with the precautionary principle, what steps could be taken to reduce the risk associated with Capital and Maintenance Dredging'

Including- 'where and how dredged material is disposed of'

- WHAT HAVE THE MMO DONE TO REVIEW THE INSTRUCTION, OR THE PRECAUTIONARY PRINCIPLE?

11c)- 'The MMO must also ensure that all the current conditions of its licence are met and should include Pyridine in their testing as part of any future licence approval process. We also believe that all dredged material

should be tested for pyridine and any that is found to have dangerous levels of pyridine should not be disposed of at sea'

HAVE THE MMO VIEWED THE RESULTS OF TESTING FOR PYRIDINE IN THE VARIATION APPLICATION?

- WHAT HAVE THE MMO DONE TO REVIEW THE INSTRUCTION?

Point 12- Objection- The Secretary of State for the Environment, Food and Rural Affairs, received a Letter dated 13th December, from the EFRA Committee, 'giving her a timescale of the 20th December, to respond to their concerns about the independent inquiry panel set up', and states that 'the Independent investigation report results, from 'external experts analysis of the evidence behind the competing theories of algae bloom and Pyridine Pollution' are expected by January 23'

Are the MMO going to wait, until after the report's findings, taking a precautionary measure on dredging, before even considering, never mind granting the variation application? -

IF NOT, WHY NOT?

Objection Point 13) The Die off's/mass wash up of Marine Life has increased dramatically since the uncontained

Die off's from the Orca Dredge exact time, onwards:-

The Orca dredged 148.000 tonnes of toxic sediment, from 25th September '21, over 10 days, from the Mouth of the Tees, and dumped it on the 3 1/2 mile dumping ground

At the same time- the destruction of the Marine Eco system happened, and has never stopped happening!

Over 30 miles down the Coast, Over 10 mile up the Coast, Devastation
Brown Crab Kelp and Dogfish

Sea Urchins



Sea Slug

Crab and Seamouse

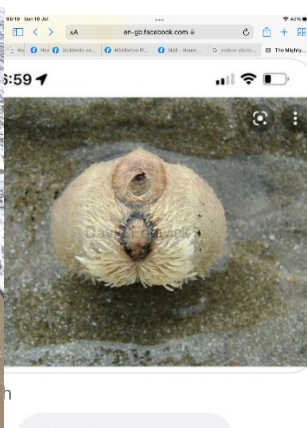
Dead Lobsters out of the pots



Porpoise Block Sands

Sea Mouse

Dead Lobster/Seamice/Sea Potatoe



Sea Anemone's

Seal

Porpoise



Dolphin



Crab Lobsters



Mass Shellfish/Razor Clams



Since the Uncontained Freeport Dredge began 1st September, Die offs and Mass Wash ups have once again, increased dramatically. These Wash ups were mostly in calm weather, so can't blame a storm.

Theoretical, not one bit of hard proof Algae bloom nonsense, can be blamed, for these wash ups and die offs, it is not the conditions for Algae bloom, and it doesn't carry on for 15 solid months, BUT, MORE

IMPORTANTLY: -

The majority of the Marine wash up's are creatures from this years plankton/birth, so were not born until this summer- so last year's pretend Algae Bloom cannot have killed them!

On the side of caution, Capital dredging should be stopped and thorough testing and investigations should be undertaken, until the cause from the Tees is proved.

Wash Ups and Die Off's since the Tees Freeport Dredge began 1st September 2022:-

Millions of tiny Whelks Mass Wash ups x 2

South Gare and Redcar

No live prawns- 2 x trawler skippers – 4 prawns each for a 10 hour tow, Tees Prawn Areas

Mass Wash up of Shrimps, Millions, from North Sands Hartlepool, to Blackhall beaches

Mass Wash up of Shrimps South Gare to Saltburn

Mass Wash up of shrimps Bridlington Beaches

Mass Wash up of Sprats Tees River Banks- millions

Mass Wash up of sprats North Sands HARTLEPOOL TO Crimdon Dene, Durham

Dead Lobsters in the pots again- example- one skipper- 18 in 1 day at Staithes, 8 the day before

Staithes Merchant losing 20% of stock overnight of lobsters in holding tanks

Dead Scallops being caught

Mass wash up of Mussels South Gare to Saltburn

Mass wash up of Razor clams Redcar

Evidence has been shared and sent in- FEEDBACK TO ME HAS NOT BEEN GIVEN

Evidence available if required, if it has been lost.

Examples provided below, of the transfer info' given:-



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Mass wash up of dead sprats on the banks of the Tees Estuary - these were born after the pretend theoretical algae bloom, so don't blame that, and calm, so don't blame stormy weather-see footage

Mass wash ups of tiny whelks, South Gare, Tees Estuary- these were born after the pretend theoretical algae bloom, so dont blame that, and calm, so don't blame stormy weather-see picture

Mass wash up of shrimps, Hartlepool North Sands to Crimdon- these were born after the pretend theoretical algae bloom, so don't blame that, and not stormy on tje day, so don't blame that

Staithe merchant losing up to 20%of lobster stock, from holding tanks, overnight,

Fisherman reported catching 18 dead lobsters in 1 day, ladt week, 8 the day before

Fishermen losing 30% lobster catch, before getting ashore to land

Merchant reporting weak lobsters again

Catches in the die off zone, very poor.

Instead of non evidenced, pretend theories or stories , Just try Pyridine as the cause.

North East Fishing Collective, have undertaken independent sampling and testing, of Tees sediment, from

IMG_5425.MOV

31 MB · mov



And 28 more



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Mass wash up of shrimps, H...

38 files · 445.3 MB · Sent 18 seconds ago · Edit title · Expires in 7 days

<https://we.tl/t-G6kU59dojc>



Download



Preview



Forward



Delete

Message

EA incident number 02114011. Mass wash ups of small shrimps, millions, over miles of beach, high to low water marks. Not a stormy sea, sea has been dropping away last 2 days.

Pass on to CEFAS and DEFRA please.

This mass wash up is one of several, since the Tees Freeport dredge started 1st September'22, which is not contained, which has been sending large amounts of silt clouds, down the River to the Sea, and contains Pyridine, pcb's and other toxic substances.

Since the Freeport Dredge started:-

Mass wash up, tiny whelks, Redcar beach- these were born after the pretend theoretical algae bloom, so don't blame that, and calm, so don't blame stormy weather- see picture

Mass wash up of dead sprats on the banks of the Tees Estuary - these were born after the pretend theoretical algae bloom, so don't

38 files

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7 MB · mov



IMG_5417.MOV

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And 28 more





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Instead of non evidenced, pretend theories or stories , Just try Pyridine as the cause.

North East Fishing Collective, have undertaken independent sampling and testing, of Tees sediment, from the area of the 3 mile dumps, into the Orca dredge spot, up the Tees, to past the Freeport dredge at Southbank.

Everyone, apart from 2 of the sea/Riverbed sediment samples, tested positive for Pyridine at a depth of only 20cm!

Feedback required. This will be circulated to the Parliamentary EFRA Committee, Chair, local MP's, Councillors, NEFC, legal, and public, PM, King Charles, who owns the foreshore, etc

Sent to 8 people

mdo.northeastarea@environment-...

✓ Not yet downloaded

info@marinemanagement.org.uk

✓ Not yet downloaded

isc@environment-agency.gov.uk

✓ Not yet downloaded

info@teesvalleymonitor.com

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northeast-newcastle@environmen...

From: Incident Communication Service <incident_communication_service@environment-agency.gov.uk>

Sent: 22 November 2022 14:29

To: 'Renhors61@outlook.com' <Renhors61@outlook.com>

Subject: FW: Incident number 02110411 - to go with the die off example evidence reported

Good afternoon,

I have passed this email. trail with attached photographs to the officer involved.

Our email is ics@environment-agency.gov.uk

Or our direct line is 0800 80 70 60

Thanks

Corina Ward

Incident Communication Service
Environment Agency

.

Tel: 0800 80 70 60

Web Site: <https://www.gov.uk/environment-agency>

Click an icon to keep in touch with us:-



From: Northeast Newcastle, Customer Contact <northeast-newcastle@environment-agency.gov.uk>

Sent: 22 November 2022 13:35

To: Incident Communication Service <incident_communication_service@environment-agency.gov.uk>

Subject: FW: Incident number 02110411 - to go with the die off example evidence reported

Hello

Please see email below and emails attached to be logged on NIRS. It's related to the crab incident along the North East coast.

The customer would like to be contacted back to confirm these have been picked up.

Many thanks

Gemma

Gemma Loeland

Customers and Engagement Officer

Environment Agency | Tyneside House, Skinnerburn Road, Newcastle Business Park, Newcastle upon Tyne, NE4 7AR

gemma.loeland@environment-agency.gov.uk

External: 02084746461

Working days: Monday to Wednesday

Please consider this a "thanks in advance". Every e-mail has a carbon footprint, so if you don't hear back from me it's because of the planet. #WhatWeCanDo



Creating a better place
for people and wildlife



From: Stan Rennie <>

Sent: 21 November 2022 21:39

To: SM-MMO-SH - MMO Info (MMO) <SH.Info@marinemanagement.org.uk>; Walker, Alan AM (CEFAS) <alan.walker@cefas.co.uk>; keith.landars@environment-agency.gov.uk; isc@environment-agency.gov.uk; Northeast Newcastle, Customer Contact <northeast-newcastle@environment-agency.gov.uk>

Subject: Incident number 02110411 - to go with the die off example evidence reported

Dear EA,

The address given on the initial call, is returning my emails today, undeliverable. Please pass on to the incident hotline, and ask if they could confirm my emails have been received, I have had an email off 'WeTransfer' that they downloaded my footage and photos, if they could confirm that to, please?

Thanks,
Stan Rennie

Please pass to ALL agencies, MMO, CEFAS, DEFRA and EA, as part of die off evidence since the Freeport dredge began

To: Stan Rennie <>

Subject:

Lobsters dying big time again, since the Freeport dredge started, Merchant losing up to 20% stock in holding tanks overnight!

Fishermen catching up to 18 dead lobsters

Individual Fisherman catching 18 dead lobsters, dead catch happening regularly again, since the Freeport dredge began!

from AB Shellfish Staithes on 1st November

From: Stan Rennie <>

Sent: 21 November 2022 21:48

To: SM-MMO-SH - MMO Info (MMO) <SH.Info@marinemanagement.org.uk>; SM-MMO-Media

(MMO) <MediaMMO@marinemanagement.org.uk>; Northeast Newcastle, Customer Contact <northeast-newcastle@environment-agency.gov.uk>; isc@environment-agency.gov.uk <isc@environment-agency.gov.uk>; keith.landiers@environment-agency.gov.uk <keith.landiers@environment-agency.gov.uk>; Walker, Alan AM (CEFAS) <alan.walker@cefass.co.uk>
Subject: Incident number 02114011 evidence of die offs increasing since the Freeport dredge began.
Fw: Dead scallops

More die offs, evidence to add to the description in the transfer download, happening since the Freeport dredge began, @ 1st September 22, increasing species dying, mass wash ups, as it goes on.

Don't blame algae, this is happening from the time of the Freeport dredge starting, spewing toxic sediment clouds, down river to sea, 1ST September- Calm Days

The Capital Dredge and VARIATION needs putting on hold, our Industry, already half the Hartlepool fleet lost in the past 12 months, now at risk of disappearing totally, because of dredging.

Stan

----- Forwarded message -----

From: **John**

Date: Sat, 12 Nov 2022, 12:03

Subject: Dead scallops

To: Joe Redfern <northsearesearch@gmail.com>

Hi joe. Been seeing a lot of freshly dead scallops out here. If you want to pass it on to Stan.

John.



isc@environment-agency.gov.uk

downloaded Mass wash up of shrimps, Hartlepool Headland, North Sands to Crimdon Dene/Blackhall beaches. Dead, dying, twitching, legs twitching, millions, from the high water to low water mark. Never seen shrimps wash up like this, ever, and I live 20yds from a beach

Yours Concerned,

Please Give Feedback to me, and on the Die off incident number 02114011 as above. This should be investigated independently, not just Government Scientists, and instructions from the EFRA Committee followed

Stan Rennie,

Fisherman,

In the North East Die Off Zone,

Around the Tees Spoil Dumping Ground and Toxic River.

On behalf of the North East Fishing Collective.