



ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING DETERMINATION

I. Project Proposal

On 15 January 2020, Exola DAC, (a wholly owned subsidiary of Providence Resources plc) (hereafter referred to as 'Exola') submitted an application to the Minister for Communications, Climate Action and Environment seeking approval to undertake a seabed and shallow geophysical survey, and an environmental baseline and habitat assessment survey, within the Barryroe licence area (SEL 1/11). The survey area is situated in the North Celtic Sea Basin approximately 49 kilometres (km) south east of the closest coastline at Ballymacshoneen, Butlerstown North, County Cork on the south coast of Ireland (the 'Barryroe K site area').

The site survey will comprise a seabed and shallow geophysical survey and an environmental baseline and habitat assessment survey at the Barryroe K site. Additional sampling will be carried out at a single environmental control point approximately 7km to the southeast of the survey area.

The survey operations will cover an area of approximately 9 km² with a 1 km buffer around the survey area where the survey vessel may manoeuvre during line turns and during equipment deployment and recovery. The greater working area is approximately 22m².

The key aims of the survey are to:

- Accurately determine water depths and provide information on depth of sediments overlying chalk bedrock and to identify and map any chalk exposures;
- Provide information on seabed and sub seabed conditions to ensure the safe emplacement and operation of a semi-submersible drilling rig at the well location;
- Provide information on the cultural potential of the survey area, including the location of any shipwrecks or other underwater cultural heritage features;
- Assess the survey area for the presence of any Annex 1 habitats (as defined in the EC Habitats Directive 92/43/EC);
- Obtain environmental baseline samples across the survey area to establish a benchmark for ongoing environmental monitoring as per OSPAR guidelines.

The survey vessel is anticipated to be working on location for approximately 3 days, excluding transit, port calls and weather downtime. Operations are proposed to take place at some point between the 1st April 2020 and 30th November 2020, subject to regulatory approval and vessel availability. If the survey has not commenced within this timeframe, it is proposed that the operations will be undertaken sometime between 1st February 2021 and 30th November 2021, again subject to regulatory approval and vessel availability.

The proposed Barryroe K site survey follows on from the site survey operations undertaken in the Barryroe (SEL 1/11) licence area at the proposed A and B well locations during September 2019. Obtaining data at the K location allows for the potential future emplacement of an additional well to the east of the previously surveyed A and B well locations, in order to further appraise the eastern panel of the Barryroe field. Any potential future activities would require separate applications for approval, during which any potential in-combination LSE on European sites would be considered.

The vessel proposed to be used for the survey is the Gardline vessel MV Kommander. It is noted in the application documents that, prior to the commencement of the proposed site survey operations, the applicant may seek approval from the DCCAE to use an alternative equivalent survey vessel.

II. DCCAE Assessment Process

The Environment Advisory Unit (**EAU**), a functionally independent and separate unit of the Department of Communications, Climate Action and Environment (**DCCAE**), is responsible for carrying out environmental screening and any environmental assessments determined as being required following screening, in accordance with the requirements set out in Directive 2011/92/EU, as amended by Directive 2014/52/EU (**EIA Directive**), Directive 92/43/EEC (**Habitats Directive**) and Directive 2009/147/EC (**Birds Directive**) in respect of applications to the Minister for permission to undertake “activities” under an exploration licence or petroleum prospecting licence.

EIA – In Ireland, the *European Union (Environmental Impact Assessment) (Petroleum Exploration) Regulations 2013* (S.I. 134 of 2013), as amended by the *European Union (Environmental Impact Assessment) (Petroleum Exploration) (Amendment) Regulations 2019* (S.I. 124 of 2019) give effect to the EIA Directive as a matter of Irish law in the context of applications for permission to undertake activities under an exploration licence or petroleum prospecting licence (**EIA Petroleum Exploration Regulations**). Regulation 3(1B) of the EIA Petroleum Exploration Regulations provides that the EAU shall carry out an EIA Screening Assessment and make a Determination as to whether the activities the subject of the application would, or would not, be likely to have significant effects on the environment by virtue, inter alia, of their nature size and location. Where it has been determined, following screening, that the activities the subject of the application are likely to have significant effects on the environment, an environmental impact assessment will be required.

AA – The European Communities (Birds and Natural Habitats) Regulations 2011 – 15, as amended (**Birds and Natural Habitats Regulations**) give effect to the Habitats Directive and the Birds Directive as a matter of Irish law and require, inter alia, that a public authority carry out screening for Appropriate Assessment of a plan or project for which an application for consent is received. Where a public authority determines that an Appropriate Assessment is required, the Regulations require that the assessment carried out by a public authority include a determination pursuant to Article 6(3) of the Habitats Directive as to whether or not the plan or project would adversely affect the integrity of a European site. The EAU is responsible for carrying out AA screening assessments (and any required Stage 2 Appropriate Assessment) in accordance with the Regulations, in respect of applications to the Minister for permission to undertake “activities” under an exploration licence or petroleum prospecting licence.

On receipt of an application, the Petroleum Affairs Division in DCCAE places the application on the DCCAE website for consultation and refers the application, and any associated responses to the consultation, to the EAU for the purposes of carrying out its assessments.

On the completion of all environmental assessments by the EAU and after incorporating any suggested conditions which may be recommended by the EAU, the application will then be evaluated by the Petroleum Affairs Division in the Department who will make a recommendation to the Minister of State regarding whether consent should be given for the 'activities' applied for.

III. Independent Expert Advisors

DCCAIE has further engaged Ramboll UK Limited (herein referred to as **Ramboll**) as independent expert environmental advisors to provide assistance to the EAU with regard to the carrying out of environmental assessments of applications for permission to carry out "*activities*" under an exploration licence or petroleum prospecting licence.

Ramboll has conducted an independent assessment of the information provided by the Applicant, having regard to the EIA Directive and the **EIA Petroleum Exploration Regulations**. The expert report prepared by Ramboll, having carried out an external review of the applicant's EIA Screening Assessment, ("*Statutory Environmental Assessment; EIA Screening Determination for Offshore Geophysical and Environmental Surveys for Barryroe K Site Survey*" ; **Ramboll Report**) is shown at Appendix 1.

IV. Environmental Impact Assessment Screening: Legislative Background

The EIA Directive (Directive 2011/92/EU, as amended by Directive 2014/52/EU) requires that projects that are likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location are made subject to an environmental impact assessment.

Under Article 4 of the EIA Directive, projects listed under Annex I are automatically subject to an environmental impact assessment and for projects listed in Annex II, Member States shall determine whether the project shall be subject to an assessment and can make the determination through: (a) case by case examination or (b) thresholds set by the Member State, or both.

Article 4(4) of the Directive requires in respect of projects listed in Annex II that the developer provide information on the characteristics of the project and its likely significant effects on the environment. The list of information to be provided is set out at Annex IIA. The developer may also provide a description of any features of the project and/or measures designed to avoid or prevent what might otherwise have been significant adverse effects on the environment.

Article 4(3) of the EIA Directive requires that when making an EIA Screening Determination as to whether a project listed in Annex II shall be made subject to environmental impact assessment, the relevant selection criteria as set out in Annex III shall be taken into account.

Article 4(6) of the EIA Directive requires that an EIA Screening Determination must be made as soon as possible and within a period not exceeding 90 days from the date on which the developer has submitted all the information required.

In Ireland, the **EIA Petroleum Exploration Regulations** give effect to the EIA Directive in the context of applications to the Minister for permission to conduct "*activities*" under an exploration licence or a petroleum prospecting licence. As set out in further detail below, the Regulations provide for case by case examination of proposed "*activities*" in the first instance, to determine whether they are likely to have a significant effect on the environment (i.e. EIA Screening Determination is required).

"*Activities*" are defined in Regulation 2 of the EIA Petroleum Exploration Regulations as meaning:

- (a) searching for petroleum (within the meaning of section 8(7) of the Petroleum Act 1960) under an exploration licence, or
- (b) doing anything referred to in section 9(5) of the Petroleum Act 1960 under a petroleum prospecting licence,

and includes deep drillings.

Section 8(7) of the 1960 Act provides that “*searching for petroleum*” means:

‘...the doing by the licensee under an exploration licence of all such things as are in his opinion necessary or desirable for the purpose of ascertaining the character, extent or value of the petroleum in the area to which the licence extends and, in particular and without prejudice to the generality of the foregoing power, includes exploring for petroleum by using geological, geophysical, geochemical and topographic examination, making borings, sinking pits, removing water from old workings and taking and removing reasonable quantities of petroleum and other minerals for analysis, test, trial or experiment.’

Section 9(5) of the 1960 Act provides as follows:

‘Every petroleum prospecting licence shall be expressed and operate to authorise the licensee, during the currency of such period as is specified in the licence, to enter on the land specified in the licence and there do all such things as the licensee considers necessary or desirable for the purpose of ascertaining the character, extent or value of the petroleum under such land and, in particular and without prejudice to the generality of the foregoing power, for the purpose aforesaid, to make geological, geophysical, geochemical and topographic examinations and to make borings, sink pits, remove water from old workings and take and remove reasonable quantities of petroleum and other minerals for the purpose of analysis, test, trial or experiment.’

Applications for geophysical examinations (including site surveys) by holders of exploration or petroleum prospecting licences come within the above definitions and are therefore subject to the requirements of the EIA Petroleum Exploration Regulations in relation to EIA Screening.

Regulation 3(1B) of the EIA Petroleum Exploration Regulations provides, in this regard, that where the holder of an exploration licence or petroleum prospecting licence makes an application to the Minister under Regulation 3(1) for permission to undertake activities under the licence, the Environment Advisory Unit of the Department (**EAU**): “*shall make a determination, having taken account of the matters specified in paragraph (2A), as to whether the activities the subject of the application would, or would not, be likely to have significant effects on the environment by virtue, inter alia, of their nature, size and location*”.

Regulation 3(2A) refers to: (a) the criteria specified in Annex III of the EIA Directive and (b) where relevant, the results of preliminary verifications or assessments of the effects on the environment carried out pursuant to European Union legislation (other than the EIA Directive).

Regulation 3(2B) provides that where a determination is made that the proposed activities would be likely to have significant effects on the environment, the EAU shall specify, with reference to the relevant criteria listed in Annex III, the main reasons for the determination.

Regulation 3(2C) provides that where a determination is made that the proposed activities would not be likely to have significant effects on the environment, the EAU shall specify:-

- (a) with reference to the relevant criteria listed in Annex III, the main reasons for that determination,
- (b) any features (proposed by the applicant) of the proposed activities which would avoid or prevent what would otherwise be significant adverse effects on the environment, and
- (c) any measures proposed by the applicant to avoid or prevent what would otherwise be significant adverse effects on the environment.

Regulation 3(2) provides that, where the EAU makes a determination that the activities would be likely to have significant effects on the environment: *“the Unit shall require the applicant to submit an environmental impact statement in respect of the activities the subject of the application.”*

V. EXOLA Application: Assessment Process

Exola submitted the following documents with the application in January 2020:-

- (i) Application for Approval to Conduct a Seabed Geophysical, Environmental Baseline and Habitat Assessment Site Survey;
- (ii) Pre-survey Fisheries Assessment at Barryroe (SEL 1/11), prepared by Sinbad Offshore Support Ltd for EXOLA DAC;
- (iii) Barryroe K Site Survey: Appropriate Assessment Screening and Natural Impact Statement;
- (iv) Barryroe K Site Survey: Environmental Impact Assessment (EIA) Screening.

Vi. Notified Bodies

Notification of the Exola Survey application was issued to the following organisations:

- Development Application Unit, National Parks and Wildlife Service;
- Irish Maritime Administration, Department of Transport, Tourism and Sport;
- Ship Source Pollution Prevention Unit Irish Maritime Administration, Department of Transport, Tourism and Sport;
- Irish Coast Guard (& National Maritime Operations Centre), Department of Transport, Tourism and Sport;
- Sea Fisheries Protection Authority;
- Sea Fisheries Policy Division, Department of Transport, Tourism and Sport;
- Department of Defence;
- Mission Support Facility, Irish Air Corps;
- Naval Headquarters;
- Marine Institute;
- Commissioners of Irish Lights

The Irish Coast Guard (& National Maritime Operations Centre), Department of Transport, Tourism and Sport responded with comments as shown in Section 2.3.1 of the Ramboll Report, referenced above and included at Appendix 1.

Vii. Initial Public Consultation

The EXOLA Barryroe K Site Survey application and supporting documentation were published on the Department website on 22 January 2020 and submissions were invited to be made on the

application during a 30-day consultation period concluding on 21 February 2020. A total of 12 responses were received as follows:-

- Three response from private individuals dated 20th February, 2020
- Eight responses from private individuals dated 21st February, 2020
- Response from Not Here Not Anywhere dated 21st February, 2020

The consultation responses received (including the project specific observations) are shown at Sections 2.3.2 – 2.3.4 of the Ramboll Report, referenced above and included at Appendix 1 to this determination.

Viii. Further Information Requested and Supplemental Consultation

Having reviewed the Exola application and accompanying documents, the response from the Irish Coast Guard and the responses received to the public consultation, Ramboll recommended that further information be obtained from Exola in relation to their application on the basis that insufficient information had been provided with the application to enable an EIA Screening Assessment and Determination be made in respect of the proposed geophysical and environmental baseline site survey. Adopting that recommendation, additional information was sought from the applicant on 10 March 2020. The Department website was updated to reflect the position and the bodies who submitted observations following the initial consultation were notified of the decision to request further information.

On 24 March 2020, the Applicant responded by submitting an updated Environmental Impact Assessment Screening Report for the Barryroe K Site Survey (March 2020) and further provided a separate document setting out the applicant's responses to the queries raised by the EAU in the Request for Clarification (Appendix 1: Response from Exola to EAU Request for Clarification).

The adequacy of the applicant responses was assessed in conjunction with Ramboll and on 1 April 2020, following receipt of additional minor clarification from the Applicant, the supplemental information received from the applicant was posted on the Department website for comment by 15 April 2020. One further response was received and the points raised have been considered as part of the EIA screening assessment process.

- Submission received from An Taisce dated 15th April, 2020

The observations made in the submission received from An Taisce during the supplemental public consultation are shown in Section 2.3.4 of the Ramboll Report (at Appendix 1 to this Determination).

VI. EXOLA Application: EIA Screening Assessment and Determination

Further to Regulation 3(1A) of the EIA Petroleum Exploration Regulations, the EIA Screening Assessment of the Exola Barryroe K Site Survey application is carried out based on information provided by the applicant on the characteristics of the proposed activity and its likely effect on the environment as specified in Annex IIA of the EIA Directive and the description provided by the applicant of the features of the proposed activities and the measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

In accordance with Regulation 3(1B) and (2A), in carrying out an EIA Screening Assessment of the application to determine whether the activities the subject of the application would or would not be

likely to have significant effects on the environment, it is necessary to have regard to, *inter alia*, the relevant selection criteria as outlined in Annex III of the EIA Directive.

In carrying out the EIA Screening Assessment of the proposed Exola Barryroe K Site Survey in accordance with these criteria, I have carefully considered the following documents:-

- Documents provided by the Applicant –
 - (i) Application for Approval to Conduct a Seabed Geophysical, Environmental Baseline and Habitat Assessment Site Survey;
 - (ii) Pre-survey Fisheries Assessment at Barryroe (SEL 1/11), prepared by Sinbad Offshore Support Ltd for Exola;
 - (iii) Barryroe K Site Survey: Appropriate Assessment Screening and Natural Impact Statement;
 - (iv) Barryroe K Site Survey: Environmental Impact Assessment (EIA) Screening;
 - (v) Barryroe K Site Survey: Environmental Impact Assessment (EIA) Screening (updated Report submitted in March 2020); and
 - (vi) Appendix 1: Response from Exola to EAU Request for Clarification;
- Ramboll Report entitled “Statutory Environmental Assessment EIA Screening Determination for Offshore Geophysical and Environmental Surveys at the Barryroe K site survey” (at Appendix 1 to this Determination) prepared following Ramboll external review of the applicant’s EIA Screening Assessment;
- Submissions received during the public consultation processes; and
- Observation received from the Irish Coast Guard as a Notified Body.

The EIA screening assessment of the proposed Barryroe K Site Survey carried out by Ramboll considered the different project elements by reference to the Annex III criteria. In this context the following elements were considered:

- Characteristics of the Project, with particular regard to size and design of the development, cumulation with other existing or approved developments, use of natural resources (particularly land, soil, water and biodiversity), production of waste, pollution and nuisances, risk of major accidents and/or disasters relevant to the project including climate change, risks to human health.
- Location of the project, with particular regard to: existing and approved land use, relative abundance, availability and regenerative capacity of natural resources in the area, absorption capacity of wetlands, riparian areas and river mouths, absorption capacity of the natural environment (paying particular attention to coastal zones and marine areas, nature reserves and parks, areas classified or protected under national legislation, areas where there has been a failure to meet environmental quality standards or in which it is considered there is such a failure, landscapes and sites of historical, cultural or archaeological significance).
- Types and characteristics of the potential impact (as set out in Annex III of the EIA Directive) with regard to the impact on the factors specified in Article 3(1) of the EIA Directive, taking into account: the magnitude and spatial extent of the impact, the nature of the impact, the transboundary nature of the impact, the intensity and complexity of the impact, the

probability of the impact, the expected onset, duration, frequency and reversibility of the impact, the cumulation of the impact with the impact of other existing and/or approved projects and the possibility of effectively reducing the impact.

Based on careful consideration of the documentation highlighted above by reference to the Annex III criteria:

- I agree with and adopt the conclusions reached in the Ramboll Report (at Appendix 1) regarding the adequacy of the information provided by the Applicant and accordingly am satisfied that the Applicant has provided sufficient information to enable an EIA Screening Assessment of the proposed Barryroe K Site Survey.
- I further agree with and adopt the response to the observation received from the Irish Coast Guard, Irish Maritime Administration, Department of Transport, Tourism and Sport (as a notified body), set out in section 2.3.1 of the Ramboll Report and the responses to the project specific observations received during the public consultation process, as set out in section 2.3.4 of the Ramboll Report.
- As regards the additional general observations received during the public consultation process, comprising general comments on legal entities and contractor, general comments on health and safety and environment (including climate change) and general economic comments (set out in section 2.3.3 of the Ramboll Report), I agree these are outside the scope of the EIA Screening Assessment process.
- I note the conclusion in the EIA Screening Assessment carried out on behalf of the applicant by Orbis Energy Limited and submitted with their application is that the proposed Exola Barryroe K site survey is not likely to have a significant effect on the environment, including Annex IV species, and it is therefore considered that an EIA is not required in this instance.
- I agree with and adopt the EIA Screening Assessment carried out by Ramboll in respect of the proposed Barryroe K Site Survey by reference to the Annex III criteria and the conclusions reached in the Ramboll Report. The Ramboll Report concludes that, subject to the implementation of the mitigation commitments detailed in section 5 of the Report, the nature and extent of the proposed activities are not likely to result in significant effects on the environment either from this project alone or in combination with other plans or projects. The mitigation commitments detailed at section 5 of the Ramboll Report include the mitigation and management commitments made by the applicant, along with additional measures required to address the issues raised in observations following the consultation with prescribed bodies and the general public.

Accordingly, I am satisfied and have decided that the proposed Barryroe K Site Survey (to take place in 2020 or 2021) is not likely to have a significant effect on the environment and, consequently, an Environmental Impact Assessment is not required in respect of the application, subject to the implementation of the mitigation measures referred to in Section 5 of the Ramboll Report, which I adopt and set out Table 1 of this Determination (below). This decision is contingent on the inclusion of these mitigation measures in any consent that may be granted in respect of this application.

Further, the vessel proposed to be used for the proposed survey is the MV Kommandor. Adopting the recommendation in the Ramboll Report, any consent granted in respect of this application must further require that the applicant obtain prior approval from DCCAE should an alternative survey vessel be proposed, in which case confirmation will be required that the survey equipment and

methodology on any replacement vessel are equivalent to that described in the updated EIA Screening Assessment Report (March 2020) submitted by Exola and Appendix 1: Response From Exola to EAU Request for Clarification, and that the nature and extent of the proposed activities described in these documents has not materially changed. Accordingly, this decision is further contingent on this requirement also being included as a condition of any consent granted in respect of this application.

The Applicant can be informed of this EIA Screening Determination and, in accordance with Regulation 3(2E) of the EIA Petroleum Exploration Regulations, the public will also be informed of this EIA Screening Determination, with the Determination being published on the Department's website and notice thereof being published in a national newspaper.

Jean Clarke

A handwritten signature in black ink that reads "Jean Clarke". The signature is written in a cursive, flowing style.

Environment Advisory Unit, 22nd , June 2020
Department of Communications, Climate Action and Environment

Table 1 : Mitigation measures required to be specified in any Consent that may be granted

Discipline	Mitigation Measure Proposed	Industry Standard	Project Specific
Physical Presence	Risk of collision with vessels reduced through the use of positioning and automatic identification systems, notice to mariners also. Contractors with good HSE performance will be used.		X
	Benthic sample stations will be investigated prior to sampling using high-resolution video or stills photography.		X
Interactions with Other Sea Users	For interactions with fishermen, the project proposes the use of a FLO, submitting a notification to “regular runners” and local fisheries organisations via Notice to Mariners through the Irish Coast Guard and notifications made to Government departments and agencies as stipulated in the DCCAE Exploration and Appraisal Rules and Procedures Manual (DCENR, 2014).		X
	In the Fishery Assessment it is recommended that an experienced Irish Marine Mammal Observer will be appointed for the duration of the survey and a multi-lingual notification campaign will proceed the survey as well as a French speaking person ashore with a working knowledge of both the fishing industry and offshore operations should be available is liaison with foreign vessel owners is required. It would be envisioned that this person would work in conjunction with the FLO.		X
Underwater Noise	Exola and its survey contractor will adhere to the DAHG Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters (DAHG, 2014), which provides mitigation measures for the protection of Annex IV species from geophysical acoustic surveys as well as a number of other offshore operations. Of note is that these measures apply specifically to marine mammals, however, observations shall also be undertaken for marine reptiles and the same procedures applied	X	
	Two qualified MMOs will be appointed to monitor marine mammals and log all data according to the standardised forms provided in the DAHG Guidance and provide an MMO report to the regulatory authorities.	X	
	Acoustic surveying will not commence if marine mammals are detected within a 500 m radius around the acoustic sources (referred to as the Monitored Zone).	X	
	Sound-producing survey activities will only be commenced in daylight hours where effective visual monitoring, as determined by the MMO, can be achieved.	X	

Discipline	Mitigation Measure Proposed	Industry Standard	Project Specific
	For sound-producing activities, as water depths across the proposed survey area are less than 200 m, pre-start-up monitoring will be conducted by the MMO at least 30 minutes before any activity using the acoustic sources is due to commence. Sound-producing survey activity using the acoustic sound sources will not commence until at least 30 minutes have elapsed with no marine mammals detected within the Monitored Zone by the MMO. This pre-start monitoring will be followed by the soft-start procedure.	X	
	Commencement of sound-producing survey activities will be undertaken using a 'soft-start' (ramp up and gradual increase in energy/noise source) procedure for any equipment where the output peak SPL exceeds 170 dB re 1µPa at 1 metre. The build-up of acoustic energy output will occur in consistent stages to provide a steady gradual increase in power (over a period of 20 minutes). Where the power of acoustic noise sources cannot be increased gradually due to operational parameters of the device, the device will be switched on and off in a consistent sequential manner for a period of 20 minutes prior to commencement of the full necessary output.	X	
	Where a soft-start procedure has commenced, there is no requirement to halt or discontinue the procedure at night or in poor weather or visibility conditions or if marine mammals are sighted within the Monitored Zone.	X	
	Where there is a break in sound output (e.g. in the event of equipment failure, shut-down etc.) from the acoustic sources for more than 30 minutes, all soft-start procedures must be undertaken before activity can recommence.	X	
	If a break in sound output occurs during the hours of darkness, the survey will be suspended until daylight when effective visual monitoring, as determined by the MMO, can be completed before start-up.	X	
	Full reporting on MMO operations and mitigation measures undertaken must be provided to the relevant regulatory authorities.	X	
Atmospheric Emissions	Compliance with the Merchant Shipping (Prevention of Air Pollution from Ship) (Amendment) Regulations 2014 and the MAPROL Convention 73/78 Appendix VI on atmospheric emissions.	X	
	Operations will be planned to minimise duration, and vessel movements, and ensure efficient operations.	X	

Discipline	Mitigation Measure Proposed	Industry Standard	Project Specific
Discharges to the Sea	Solid waste stored onboard and handled with the Waste Management Hierarchy, MARPOL and the Sea Pollution (Prevention of Pollution by Garbage from Ships) Regulations 2012. Garbage Management Plan will be developed in accordance with MARPOL Annex V. Contractors must use authorised waste contractors.	X	
	Adherence to IMO and Irish Regulations and guidance on ballast water management.	X	
	All discharges will be treated and discharged according to the MARPOL Convention and any additional IMO requirements.	X	
	Survey vessel will have a Shipboard Oil Pollution Emergency Plan (SOPEP) in place in accordance with Annex I of MARPOL.	X	
	Small spill kits on board the vessel deck to clean-up spills of utilities hydrocarbons or chemicals before they can enter the sea.	X	
	Refuelling of the survey vessel to be undertaken in port, thus reducing potential for collision or spillage at sea.	X	
	As per Sea Pollution (Miscellaneous Provisions) Act 2006 Part 3 Para 20 and 21 the operator will provide: <ul style="list-style-type: none"> • A risk assessment re hydrocarbon discharge; and • A plan for the prevention and minimisation of any accidental discharge. Operations such as the “ship to ship” transfer of fuels or other HNS substances which present a hazard to the marine environment are prescribed operations within the Irish EEZ and as such require a permit for operations from the Irish Coast Guard (DTTAS). The Operator should update and advise the IRCG of the commencement and suspension or termination of survey operations offshore via the Marine Rescue Coordination Centre (MRCC) Dublin and a Radio Navigational Warning (RNW) should be promulgated via the same.	X	
Archaeology	Geophysical data will be used to ensure no marine archaeology sites are disturbed and to provide information on the cultural potential of the survey area.		X
	Investigation of benthic grab sample sites using video/photos will be undertaken in order to confirm the absence of features of cultural heritage sensitivity.		X
	The services of a suitably qualified and suitably experienced marine archaeologist, to include experience in the interpretation of marine geophysical data, shall be engaged in advance of any such survey to undertake the Underwater Archaeology Impact Assessment so as to inform on the cultural potential of the area and advise on the known or potential location of any shipwrecks of other underwater cultural heritage sites within the specified survey area. This is particularly relevant where		X

Discipline	Mitigation Measure Proposed	Industry Standard	Project Specific
	environmental surveying is proposed to be carried out.		
	The UAIA should comprise a desktop study and archaeo-geophysical interpretation of all geophysical survey results as well as assessment of the results of all sampling.		X
	The UAIA shall be licensed by DAHG and a detailed method statement shall accompany the licence application by the archaeologist.		X
	The archaeologist should ideally be on board the survey vessel to view the geophysical data in real time and identify known and potential underwater cultural heritage as it is encountered. If it is not possible the results of all marine geophysical survey undertaken shall be made available to the archaeologist for assessment and interpretation, and to inform on any potential submerged cultural heritage or submerged palaeo-landscape evidence.		X
	The UAIA report shall be forwarded to the Underwater Archaeology Unit of the Department of Culture, Heritage and the Gaeltacht for consideration and further comment in advance of any site investigation/sampling works taking place.		X
General	Prior to the commencement of the proposed site survey operations, the applicant may seek approval from DCCAIE to use an alternative equivalent survey vessel.		X
	Appropriate steps will be taken regarding the use and handling of substances that could be harmful to human health or the environment, in accordance with Regulations and best practice.	X	
	Solid waste will be stored appropriately on the vessel and returned to shore for handling in accordance with the Sea Pollution (Prevention of Pollution by Garbage from Ships) Regulations 2012.	X	
	Garbage Management Plan will be in place in accordance with MARPOL Annex V.	X	
	The applicant must seek approval from the DCCAIE to use an alternative equivalent survey vessel or equipment from that described in the EIA Screening Report. In this event, the DCCAIE would seek confirmation that the survey equipment and methodology on any replacement vessel are equivalent to that described in the EIA Screening Report and that the description of the development used to inform the EIA Screening Report is still valid. With regard to the environmental sampling equipment, the applicant must update the proposed equipment to be used prior to commencement.		X

Discipline	Mitigation Measure Proposed	Industry Standard	Project Specific
	With regard to the avoidance/prevention of significant effects on population and human health, it will be the responsibility of the applicant and their contractor to ensure that Government requirements and guidelines are met in relation to Covid-19.		X

