8th February 2022

Your ref: FS007404
Our ref: I002IE

DP Energy Ireland Limited
2nd Floor, 1 Horgan's Quay,
Waterfront Square, Cork City
T23 PPT8

E-mail : [redacted]

[redacted]
Foreshore Unit
Department of Housing, Local Government and Heritage
Newtown Road
Wexford
Y35 AP90

Re: FS007404 Inis Ealga Marine Energy Park (additional cable corridor) Site Investigations – Inis Ealga Marine Energy Park Ltd.' Response to Public & Prescribed Body Submissions

Dear [redacted]

I refer to your emails dated December 2021 in related to the above Foreshore Licence Application, and the submissions made to your office by public & prescribed bodies. Please note Inis Ealga Marine Energy Park Ltd.' comment on each submission as follows:

Submission 1:

> *"I want to object to the wind farm at Ballycotton called inis Ealga Marine energy park ref number FS 007404 because I make my living for hook head to cork harbour I have a under 10m trawler and work in that Area that the wind farms are proposed to go if they go head I will lose my Lively hood my boat is too small to work off out side in the deep water"*

Inis Ealga Marine Energy Park Ltd. Response: The application for Foreshore License pertains only to proposed site investigation activities, which are temporary and short term in nature. The submission above references potential impacts on fishing activities due to the presence of a wind farm, which is not pertinent to this application for Foreshore License which proposes site investigations-only. It is acknowledged that a degree of temporary displacement of fishing activity may result during some of the proposed site investigations, particularly during towing of equipment, and Inis Ealga Marine Energy Park Ltd. is committed to engaging with the fishing community to minimise disturbance as far as possible and to discuss any potential impacts in an open manner. Inis Ealga Marine Energy Park Ltd. will give timely notice before

commencement of survey works through the publication of marine notices and through its ongoing engagement with fishers and fisheries organisations.

Submission 2: NIFA, NIFO and Submission 3 (same text)

Inis Ealga Marine Energy Park Ltd.' response is set out below in accordance with the headers used throughout the NIFA, NIFO submission:

"Importance of area to Inshore Fishing Activity"

Inis Ealga Marine Energy Park Ltd. Response: The proposed site investigations will be short in duration, and the area of foreshore occupied by survey vessels will be limited.

Inis Ealga Marine Energy Park Ltd. has commenced engagement with the fishing community both through the Fisheries Liaison Officer appointed to the project since 2020 and via DP Energy's Community & Stakeholder Liaison Manager appointed to the project since 2020. We acknowledge that there is potential for some disruption to the fishers. Information such as seasonality of the fishery can inform the survey timing and area to minimise disruption to the fishers.

Potential effects on fish species due to the proposed site investigations are appraised in Section 2.3 of the document submitted in support of this application for Foreshore License as 'Environmental Supporting Information'. Potential effects on Commercial Fisheries due to the proposed site investigations are appraised in Section 2.6 of that same 'Environmental Supporting Information' document.

"Likely short term disruption of activity and economic impact caused by the same."

Inis Ealga Marine Energy Park Ltd. Response: Inis Ealga Marine Energy Park Ltd. recognises the potential for disruption to the fishers within the survey area and agree that any disruption will be kept to a minimum. For disruption to be kept to a minimum, it is essential that correct and accurate information is obtained regarding fishing area and seasonality.

Inis Ealga Marine Energy Park Ltd. has commenced engagement with the fishing community both through the Fisheries Liaison Officer appointed to the project since 2020 and via DP Energy's Community & Stakeholder Liaison Manager appointed to the project since 2020. Engagement with all those with economic interests (including fishing, tourism and other) will be a key part of this ongoing stakeholder engagement. To this end, an additional resource has been appointed to the project since 2021: a Community Liaison Officer.

This application for Foreshore License pertains only to site investigation activities which are temporary and short-term in nature and will not result in significant economic impact.

"Medium to long term economic impact."

Inis Ealga Marine Energy Park Ltd. recognises the potential for impacts of any future wind farm development on the economy (whether positive or negative) and will undertake a detailed appraisal of any potential impacts of Inis Ealga Marine Energy Park on socioeconomics, including on the fishing industry. This appraisal of potential impacts will be set out within the

Environmental Impact Assessment Report to be submitted to An Bord Pleanála in support of any eventual Development Consent application for an offshore wind farm.

"These concerns are based on previous experience for similar site investigation works associated with the Eirgrid Celtic Interconnector project. Members inform that shrimp fishing was exceptionally poor for over a month following those works"

Inis Ealga Marine Energy Park Ltd. Response: To address specific concerns, and recognising the importance of the fishing industry to coastal communities and the economy as a whole, Inis Ealga Marine Energy Park Ltd. has appointed a specialist Fisheries Liaison Officer (FLO) (John Harrington) to work closely with the fishing community, and with DP Energy's Community & Stakeholder Liaison Manager, in assisting with the early engagement process and to provide technical feedback on fisheries concerns raised.

Inis Ealga Marine Energy Park Ltd. is currently collating and assessing the concerns raised by the members of fishing industry during ongoing engagement and will produce a policy concerning survey zoning and mitigation methods for the proposed site investigations.

Submission 3:

Inis Ealga Marine Energy Park Ltd. Response: Please see response to submission 2.

Submission 4: Dated 19th November 2021

'..I am making this response as a person directly dependent on a Commercial Inshore Fishing Enterprise, and am concerned the project outlined will impact negatively on this enterprise. I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, and my livelihood. I am also concerned about displacement of fishing activity as a result in the wider area and the negative impact this will have on this enterprise'

Inis Ealga Marine Energy Park Ltd. Response: To address specific concerns, including those set out in Submission 4, and recognising the importance of the fishing industry to coastal communities and the economy as a whole, Inis Ealga Marine Energy Park Ltd. has appointed a specialist Fisheries Liaison Officer (FLO, John Harrington) to work closely with the fishing community, and with DP Energy's Community & Stakeholder Liaison Manager, in ensuring early engagement and to provide technical feedback on fisheries concerns raised.

Inis Ealga Marine Energy Park Ltd. is currently collating and assessing the concerns raised by the members of fishing industry during ongoing engagement and will produce a policy concerning survey zoning and mitigation methods for the proposed site investigations.

Potential effects on fish species due to the proposed site investigations are appraised in Section 2.3 of the document submitted in support of this application for Foreshore License as 'Environmental Supporting Information'. Potential effects on Commercial Fisheries due to the proposed site investigations are appraised in Section 2.6 of that same 'Environmental Supporting Information' document.

Submission 5: Inland Fisheries Ireland (IFI)

Inis Ealga Marine Energy Park Ltd.' response is set out below in accordance with the headers used throughout the IFI submission:

"Recommendations for mitigation measures for fish."

Inis Ealga Marine Energy Park Ltd. Response: The mitigation measures recommended by IFI on page 2 of its submission are noted. When considering these recommendations, Inis Ealga Marine Energy Park Ltd. would like to request that the Department also consider that the design of the proposed site investigations has yet to be finalised. In particular, the activities which are likely to generate the most noise will not be fully designed, specified, procured, and executed until the initial survey activities have been completed. This approach allows the results of the initial site investigations to inform the design of the more detailed site investigations. An obligation on Inis Ealga Marine Energy Park Ltd. to work to mitigate potential impacts using careful survey design and by adhering to best practice is suggested, as opposed to inclusion of more specific conditions in any Foreshore License granted.

The document submitted in support of the application for Foreshore Licence as 'Foreshore Licence Application: Supporting Information for Screening for Appropriate Assessment' sets out in Section 3, a description of the receiving environment including Fisheries & Aquaculture as Section 3.2. Potential Environmental Impacts are appraised in Section 4, including potential disturbance from underwater noise associated with the proposed site investigations (see Section 4.2) and potential injury due to collision (see Section 4.3).

EP Energy's Community and Stakeholder Liaison Manager will engage with all businesses in the vicinity of the proposed survey area, including local angling clubs and charter companies, ahead of the proposed site investigations taking place.

And, Inis Ealga Marine Energy Park Ltd. will engage with those other projects in the vicinity of Inis Ealga Marine Energy Park to ensure that survey activities are co-ordinated such as to minimise potential adverse effects on marine mammals and local fish populations.

Submission 6: Department of Housing, Local Government and Heritage, Marine Advisor, Environment

Inis Ealga Marine Energy Park Ltd. Response: The submission made by the Department of Housing Local Government and Heritage, Marine Advisor, Environment, is noted, including the reference to requirement for Risk Assessment for Annex IV Species. Inis Ealga Marine Energy Park Ltd. trusts that the Risk Assessment for Annex IV Species submitted as distinct document in support of **FS007404** meets the Department's requirements. The EIA Pre-Screening appended to this submission is noted also, including its conclusion that no EIA or Screening for EIA is required.

Submission 7: Department of Housing, Local Government and Heritage, Development Applications Unit

Inis Ealga Marine Energy Park Ltd. Response: The submission made by the Department of Housing, Local Government and Heritage, Development Applications Unit (DAU), regarding archaeology is noted.

One section of the submission makes five recommendations relating to an archaeology *desktop study*. Another section of the submission makes four recommendations relating to archaeology *field survey*. We have no objection to these recommendations being included as site-specific conditions to the licence.

Inis Ealga Marine Energy Park Ltd. has commissioned RHDHV as its lead Environmental Impact Assessment Report (EIAR) consultant for the project. A thorough EIAR Scoping Exercise is scheduled to commence for Inis Ealga Marine Energy Park from the end of February 2022. This EIAR Scoping Exercise will involve consultation with a range of Prescribed Bodies and other stakeholders. The Underwater Archaeology Unit will be invited to participate in the EIAR Scoping Exercise. Following the EIAR Scoping Exercise, work on EIAR-proper will commence with a full baseline assessment, including for archaeology both offshore and onshore. This baseline assessment will comprise both *desktop study* and *field survey* for archaeology. The EIAR will be made publicly available in support of application for Development Consent to be sought from An Bord Pleanála in due course.

Submission 8: Marine Survey Office

Inis Ealga Marine Energy Park Ltd. Response: We welcome the observations of the Marine Survey Office stating *"Marine Survey Office has no objection to the above referenced application from a navigational safety perspective. "*

We have no objection to the proposed conditions, as recommended by the Marine Survey Office being included as site-specific conditions to the licence.

Submission 9: Marine Institute

Inis Ealga Marine Energy Park Ltd. Response: We welcome the observations of the Marine Institute stating, "*the Marine Institute is satisfied that the site investigations as proposed will not have a significant impact on the marine environment in the survey area and will not have a significant impact on other legitimate uses / users of the area and therefore has no objections to a licence being granted."*

We have no objection to the proposed conditions, as recommended by the Marine Institute being included as site-specific conditions to the licence.

We wish to note that Inis Ealga Marine Energy Park Ltd. is currently engaged in consultation with local fishers regarding the proposed site investigations and that a Fisheries Liaison Officer has been appointed to Inis Ealga Marine Energy Park since 2020. Inis Ealga Marine Energy Park Ltd. has commenced engagement with the fishing community both through the Fisheries Liaison Officer appointed and via DP Energy's Community & Stakeholder Liaison Manager also appointed to the project since 2020.

Submission 10: Department of Agriculture, Food, and the Marine

Inis Ealga Marine Energy Park Ltd. Response: Inis Ealga Marine Energy Park Ltd. acknowledges the two conditions recommended by the Department of Agriculture, Food, and the Marine for inclusion in any Foreshore License issued to the project. These relate to engagement of a

Fisheries Liaison Office and ensuring that the Fisheries Liaison Officer engages with the survey contractors in advance of, during and following the proposed site investigations. A Fisheries Liaison Officer has and will continue to be engaged by the project. We have no objection to the proposed conditions, as recommended by the Department of Agriculture, Food, and the Marine, being included as site-specific conditions to the licence.

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,

[redacted]

[redacted]

DP ENERGY