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**STATUTORY
ENVIRONMENTAL
ASSESSMENT
APPROPRIATE
ASSESSMENT
SCREENING
DETERMINATION
REVIEW FOR
KINSALE AREA
DECOMMISSIONING
PROJECT – CONSENT
APPLICATION 3**

RAMBOLL

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STATUTORY ENVIRONMENTAL ASSESSMENT KINSALE AREA DECOMMISSIONING PROJECT – CONSENT APPLICATION 3

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EXECUTIVE SUMMARY

Ramboll UK Limited (herein referred to as Ramboll) has been commissioned by the Department of the Environment, Climate and Communications (herein referred to as DECC) to provide assistance with regards to the statutory assessment of applications by PSE Kinsale Energy Limited and PSE Seven Heads Limited (referred to herein as the applicant) for an Appropriate Assessment (AA) Screening review.

The applicant has submitted two applications for consent to carry out decommissioning of certain facilities within the Kinsale Area gas fields (referred to as the Kinsale Area Decommissioning Project (KADP)), incorporating the Kinsale Head gas field and facilities (which includes the Southwest Kinsale and Ballycotton gas fields) and the Seven Heads gas field and facilities respectively.

The application in relation to Kinsale Head gas field covers the following activities:

- The leaving *in situ* of all infield pipelines and umbilicals associated with the Kinsale Head gas fields;
- The leaving *in situ* of the 24" export pipeline (offshore and onshore section) and the filling of the onshore section with grout; and
- The use of engineering materials (rock placement) to protect the pipelines and umbilicals *in situ*.

With regards to the Seven Heads gas field the application covers the following activities:

- The leaving *in situ* of all infield pipelines and umbilicals associated with the Seven Heads gas field
- The leaving *in situ* of the 18" Seven Heads export pipeline and umbilical; and
- The use of engineering materials (rock placement) to protect the pipelines and umbilicals *in situ*.

The competent authority (DECC) is required to consider the potential effects of such activities on the integrity of Natura 2000 sites, with respect to Article 6(3) of Council Directive 92/43/EEC which is transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011-21 as amended (the Birds and Natural Habitats Regulations).

This report provides an appraisal of the Appropriate Assessment (AA) Screening Report and subsequent Addenda submitted by the applicant.

Public consultation on the application has been undertaken by DECC. All submissions and observations received by the DECC have been taken into consideration in the preparation of this report.

Ramboll confirms that the information provided by the applicant is considered to be adequate, up to date and that no other information is required to make a screening determination. The applicant provided adequate, up-to-date, best scientific information so as to enable the DECC to make an Appropriate Assessment screening determination and to determine whether the integrity of a European site is likely to be adversely affected by the proposed project.

This report concludes that the proposed project, either alone or in combination with any other plan or project, will not have an adverse effect on the environment or on the integrity of any European site in view of its conservation objectives and will not cause any significant disturbance to the Annex IV species described.

Table 1.1: Recommendation of Screening Determination

Outcome of Screening Report Assessment	Overall Screening Opinion / AA Required?
<p>No Likely Significant Effects on Natura Sites identified, or project is directly connected with or necessary to the nature conservation management of the Natura site.</p>	<p>No likely significant effects on European Sites have been identified, having had regard to the potential connectivity with sites, relevant conservation objectives and the potential for in combination effects and will not cause significant disturbance to Annex IV species described. Appropriate Assessment is not required.</p>
<p>Likely or Potential Likely Significant Effects on Natura Sites identified, and project is not directly connected with or necessary to the nature conservation management of the Natura site.</p>	<p>Appropriate Assessment is required because it cannot be excluded, on the basis of the initial assessment (AA screening) provided by the applicant, that the project will have either individually or in combination with other plans or projects a likely significant effect on European sites.</p>

1. INTRODUCTION

Ramboll UK Limited (herein referred to as Ramboll) has been commissioned by the Department of the Environment, Climate and Communications (herein referred to as DECC) to provide assistance as competent experts for the statutory assessment of an application by PSE Kinsale Energy Limited and PSE Seven Heads Limited (referred to herein as the applicant), submitted in respect of consent to carry out decommissioning of certain activities of the Kinsale Head gas fields and decommissioning of certain facilities of the Seven Heads gas field. The authors hold undergraduate and postgraduate qualifications in environmental science (or related disciplines), professional qualifications including chartered status with the Society for the Environment and full membership of the Institute of Environmental Management and Assessment (MIEMA) and have long standing experience as expert practitioners within the fields of offshore development, environmental impact assessment and the appraisal of applications in the context of the Birds and Natural Habitat regulations.

This report provides an assessment of the Report for the purposes of Appropriate Assessment Screening and Article 12 Assessment Screening and associated addenda submitted by the applicant, prepared and approved by Ramboll as competent experts having relevant qualifications and experience. Documents Reviewed

The following documents have been reviewed to inform this review:

- Letter to Minister. Kinsale Head Plan of Development. Dated 13 October 2021;
- Letter to Minister. Seven Heads Plan of Development. Dated 13 October 2021;
- Letter to Minister. Kinsale Head Plan of Development. Dated 27 January 2022;
- Letter to Minister. Seven Heads Plan of Development. Dated 27 January 2022;
- Report for the purposes of Appropriate Assessment Screening and Article 12 Assessment Screening. 14 June 2018. Ref 253993-00-REP-14;
- Appropriate Assessment Screening and Article 12 Assessment Screening Addendum. 8 August 2019. Ref 253993-00-REP-23;
- Appropriate Assessment Screening and Article 12 Assessment Screening Addendum No.2. 30 September 2021. Ref 253993-00-REP-26;
- Addendum to Screening for Appropriate Assessment and Article 12 Assessment (KADP Pre/Post Rock Placement Surveys). January 2022;
- Report for the Purposes of Appropriate Assessment Screening and Article 12 Assessment Screening Addendum No.2 (Re-issue: 22 April 2022); and
- Pre-survey Fisheries Assessment Report. January 2022.

1.1 Project Background

The competent authority (DECC) is required to consider the potential effects of such activities on the integrity of Natura 2000 sites, with respect to Article 6(3) of Council Directive 92/43/EEC which is transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011-21 as amended (the Birds and Natural Habitats Regulations).

2. TERMS OF REFERENCE

2.1 Legislative context

This report has been prepared having regard to EC Directive 2009/147/EC¹ on the conservation of wild birds (commonly referred to as the Birds Directive) and EC Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (commonly referred to as the Habitats Directives), the European Communities (Birds and Natural Habitats) Regulations 2011-21 (the Birds and Natural Habitats Regulations) as amended and relevant jurisprudence of the EU and Irish courts.

The Appropriate Assessment Screening confirms that the Project has been screened having regard to the Birds and Habitats Directives and the Birds and Natural Habitats regulations and relevant jurisprudence of the EU and Irish courts.

2.2 Relevant guidance

This report, the AA Screening and AA Screening Addenda have been prepared having regard to guidance on appropriate assessment for planning authorities, published by the Department for Environment, Heritage and Local Government (DEHLG) in 2009². In addition, the structure and content of this report is based upon the methodology published by the European Communities in 2002³ and Commission notice C (2021)⁴.

2.3 Consultation

2.3.1 Notified Bodies

Notification of the application was issued to the following organisations:

- Cork County Council;
- The Office of Public Works;
- Minister for Agriculture, Food and the Marine;
- Minister for Rural and Community Development;
- The Health and Safety Authority;
- Bord Iascaigh Mhara;
- The Environmental Pillar;
- The Heritage Council;
- National Parks and Wildlife Service;
- An Taisce;
- Minister for Tourism, Culture, Arts, Gaeltacht, Sports and Media;
- Minister for Transport;
- Sea Fisheries Protection Authority;
- Marine Institute;
- The Irish Whale and Dolphin Group; and

¹ Amending Directive 70/409/EEC

² DEHLG (2009) Appropriate Assessment of Plans & Projects in Ireland - Guidance for Planning Authorities, Revision Notes added 2010: <https://www.npws.ie/protected-sites/guidance-appropriate-assessment-planning-authorities>

³ European Communities (2002) Assessment of Plans and Projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EE: https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

⁴ Commission notice C (2021) 6913 final "Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive: <https://op.europa.eu>

- The Environmental Protection Agency.

The Department of Transport provided a response that it had no observations to provide in respect of the application. Responses to the notification were received from the following organisations:

- The Irish Whale and Dolphin Group;
- National Parks and Wildlife Service; and
- Sea Fisheries Protection Authority.

The responses received from The Irish Whale and Dolphin Group (IDWG) and National Parks and Wildlife Service (NPWS) as described below (as applicable to the AA screening assessment).

2.3.2 Public Consultation

The application was advertised by the DECC on their website following receipt of the application on 14 October 2021. Invitations for submissions were advertised by DECC to be received by close of business on 17 November 2021 to ensure consideration by the Minister.

Five responses were received from the public in response to this consultation, and the points raised by these have been considered and responded to in the following sections of this report:

- Simply Blue Energy dated 17 November 2021;
- dCarbonX Ireland Ltd dated 15 November 2021;
- SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd dated 11 November 2021;
- SLR Consulting Ireland on behalf of Predator Oil and Gas Holdings Plc dated 11 November 2021; and
- Irish Whale and Dolphin Group (IWDG) dated 17 November 2021.

Following receipt of additional information from the applicant, the DECC advertised a further consultation period on this information from 31 January 2022 to 07 March 2022. One response was received in response to this consultation, from Not Here Not Anywhere dated 07 March 2022.

Following review of the application documents the DECC submitted a request for further information to the applicant. A further consultation was held on the Further Information Response from 26 April 2022 to 10 May 2022. One response was received in response to this consultation, from the Environmental Protection Agency (EPA) dated 10 May 2022.

2.3.3 General Consultation Responses

A number of general consultation responses have been received in relation to the applications. The comments represent general comments in regard to climate, energy storage and environment, and general comments on policy and securing future energy supply. Appropriate regard has been given to the issues raised in these submissions, however, the observations are not considered to be relevant to the scope of the report and therefore are not considered further. The general consultation responses received are presented in Appendix B.

2.3.4 Project Specific Consultation Responses

A number of project specific responses have been received in relation to the applications. The majority of the project specific responses received have related to policy issues (for example, potential re-uses for the Kinsale Area facilities); these responses have been considered as not relevant to the AA screening assessment by the Environmental Assessment Unit (EAU) and are therefore not considered further. The general consultation responses received related to policy are presented in Appendix B.

Project specific responses considered relevant to the AA screening assessment by EAU and considered further in this report are summarised in Table 2.1 below.

Table 2.1 Project Specific Consultation Responses

Consultee	Project Specific Comments	Response
SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd	<p>Based on the Consent Application No. 3 submitted by PSE Kinsale Energy Ltd, Mag Mell Energy Ireland Ltd has the following requests for clarification and additional information required to integrate the reuse of the 24" gas export pipeline in the Mag Mell LNG FSRU project engineering design:</p> <ul style="list-style-type: none"> • It is indicated that the 24" pipeline has already been filled with inhibited seawater and disconnected from KA platform. Please can this be confirmed. Also, it is unclear where the 24" pipeline has been disconnected from the KA platform (e.g. at the top or bottom of the riser). Please can the point of disconnection be confirmed. • It is not indicated if the connection between the 24" pipeline and the riser/spoolpieces at the base of the KA platform are welded or flanged connections. Please can this be clarified, and if it is a flanged connection, please provide details of the flange type. • It is indicated that no subsea intervention is required if/when the grout plug is pumped in at the onshore end of the 24" pipeline. This infers that there is some type of end fitting already installed on the subsea end of the 24" pipeline. Please can details of this end fitting be provided (e.g. flanged or welded, flange type, valving details, etc). • Please provide details of the chemicals used to inhibit the seawater prior to filling the 24" pipeline (i.e. type, specification/datasheet, dosage, period of time the protection provides, when inhibiting chemicals were introduced, etc). • Is it assumed that the operator has carried out periodic internal in-line inspections (ILI) of the 24" pipeline. Please provide the latest ILI reports and date. In particular, please provide the report and data from the most recent ILI. If possible, please also provide historical ILI so that the rate of any corrosion can be assessed. • It is assumed that the operator has also carried out periodic external survey inspections of the 24" pipeline. Please provide the latest survey reports and data. In particular, please provide the latest report and data from any cathodic protection surveys performed. • The 24" pipeline is reported to have been installed in 1977 and given the timeframe it is assumed that the operator will have been obliged to gain approval of any critical changes in design details and/or operating limitations for the 24" pipeline. Please provide details of any such changes and any safety case submissions required to obtain approval to operate. 	This information is not considered necessary to inform the determination by EAU and therefore this additional information has not been requested from the applicant.

Consultee	Project Specific Comments	Response
	<ul style="list-style-type: none"> It is assumed that an integrity management system was in place by the operator. Please provide the latest annual report/s regarding integrity assessment/s for the 24" pipeline. 	
IWDG	<p>It is generally recognised from the noise levels supplied with the application that these are not sufficient to pose a serious threat or disturbance to cetaceans, except in the immediate vicinity of activities. However, on pages 187 and 188 (Kinsale Development EIAR Volume 2) the claim the Doppler Velocity logs are inaudible to marine mammals is correct because of their high frequency, but the assertion that the USBL systems are "<i>not expected to be discernible from the broadband noise of associated vessels</i>" is either incorrect or else these vessels produce a lot of noise in unusual frequencies which requires strict mitigation. Furthermore, while the frequencies of 20 to 40 kHz for the operating range of USBL systems is roughly correct. The widely used Kongsberg (2016) USBL systems such as HiPAP 502, HiPAP 452 and HiPAP 352 operate between 21 and 31 kHz and the SonarSyne (no date) ROVnav6, chosen as an example in the EIAR operates between 19 and 34 kHz and the Tritech MicroNav from 20 to 28 kHz. Some USBL systems intended for deepwater operation such as the HiPAP102 use frequencies from 10 to 15.5 kHz. Transponder source levels with Kongsberg depend on setup and mode of operation but vary from 190 dB to 206 dB re1µPa@1m and the Sonardyne system operates at 187 to 196 dB re1µPa@1m. The operating source levels of the Tritech system are not available. Therefore, the information on the USBL if based on the Sonardyne system alone and some 10 dB lower than systems that may be used, lacks full consideration of source level impact. 10 dB represents a trebling of sound pressure levels.</p>	<p>AA Addendum (Jan 22) on the pre/post rock placement surveys provides further detail on expected sound sources by detailing potential equipment to be used, e.g. see Section 2.2.</p> <p>No low frequency survey equipment will be used (the lowest frequency source which may be used is the USBL, which typically operates at 20-40kHz); no airgun, sparker (electrostatic discharge) or boomer (accelerated water mass) will be used</p> <p>Table 2.1 summarises indicative source characteristics of the survey equipment (and comparable equipment) which will potentially be used in the planned surveys, drawing on results of Crocker & Fratantonio (2016) supplemented by manufacturer specifications where required.</p> <p>In addition to those sources described in Table 2.1, there may be the use of an USBL system to monitor the position of towed equipment. The USBL system consists of a multi-element transducer mounted on the hull of a vessel and a</p>

Consultee	Project Specific Comments	Response
		<p>transponder attached to the towed equipment (e.g. side-scan sonar).</p> <p>It is considered that through AA Addendum (Jan 2022) the applicant has adequately considered sound sources with respect to disturbance to marine mammals.</p>
IWDG	<p>The multi-beam and sidescan sonar systems are stated as having a frequency usage of 200-400 kHz and 114 or 410 kHz respectively. It should be remembered that these are target frequencies for this equipment and such equipment will produce side lobes of energy in secondary frequencies. These frequencies have only been found below injury levels to date and therefore only represent a possible disturbance threat.</p>	<p>It is considered that the applicant has adequately considered sound sources with respect to disturbance to marine mammals.</p>
IWDG	<p>Such decommissioning work has never been carried out in Irish Waters previously. The equipment models to be used are assumed and the frequency range and sound source levels not necessarily completely accurate. While it seems unlikely that sound source levels will reach those high enough to cause temporary threshold shift, disturbance is entirely possible. In order to properly assess the impact of the decommissioning activities there should be acoustic monitoring of activities in the frequencies used by marine mammals up to 48 kHz as a minimum, and ideally to 200 kHz. Noise levels encountered in noise monitoring must be explained, with the source identified. The IWDG have called for German regulations for windfarm construction to be implemented, which established noise induced injury prevention thresholds that call for Sound Exposure Levels (SELs) not exceed 160 dB re1μPa²s and a peak-to-peak sound pressure level not exceeding 190 dB re 1 μPa at a distance of 750 m. Similar noise monitoring should also ensure these threshold levels are not exceeded in this operation.</p>	<p>It is considered that the applicant has adequately considered sound sources with respect to disturbance to marine mammals, and significant disturbance to Annex IV species is not predicted. Therefore it is not proposed to engage a Marine Mammal Observer (MMO) or undertake noise monitoring during the works.</p>
IWDG	<p>Additionally, a Marine Mammal Observer (MMO) should record all sightings and operations, including activation of all acoustic equipment, and conduct effort watches with detailed</p>	<p>As significant disturbance to Annex IV species (marine mammals) from</p>

Consultee	Project Specific Comments	Response
	<p>recording of marine mammal interactions with survey operations, where these may occur. If operations are occurring in more than one location simultaneously this would require a second MMO. The MMO should be authorised to stop or delay operations where safe to do so, if there is a clear disturbance and conflict with the Habitats Directive Article 12, and report on the rationale for any such decision immediately to the regulator. PAM (Passive Acoustic Monitoring) would greatly assist the correct reporting of noise production activities and allow identification of specific activities and operations which cause disturbance. These could then be more accurately monitored and reported by mitigation monitoring personnel.</p>	<p>underwater noise is not predicted, it is not proposed to engage an MMO during the works, or that any specific mitigation is required in relation to underwater noise effects.</p>
<p>Environmental Protection Agency</p>	<p>The Agency advises that two dumping at sea permit applications have been submitted to the Agency for the Kinsale Area Decommissioning Project as follows:</p> <ul style="list-style-type: none"> • PSE Kinsale Energy Limited submitted a dumping at sea permit application (Reg. No. S0034-01) to the Agency on 21st October 2021. The permit application is for the dumping at sea (or leaving <i>in situ</i>) of redundant gas export pipelines, in-field gas pipelines, in-field control umbilicals and umbilical contents associated with the decommissioning of the Kinsale Head gas fields and facilities. The applicant is seeking to leave in place circa 92 km of subsea steel pipelines varying in size from 273–610 mm and 21km of control umbilicals varying in diameter from 82–98mm. This application is currently under assessment by the Agency. The application and associated documents, can be found at the following link: https://epawebapp.epa.ie/terminalfour/DaS/DaS-view.jsp?regno=S0034-01. <p>PSE Seven Heads Limited submitted a dumping at sea permit application (Reg. No. S0035-01) to the Agency on 22nd October 2021. The permit application is for the dumping at sea (or leaving <i>in situ</i>) of redundant in-field gas pipelines, in-field umbilicals and umbilical contents associated with the decommissioning of the Seven Heads gas fields and facilities. The applicant is seeking to leave in place circa 61km of subsea steel pipelines, varying in size from 203–457 mm and 61 km of control umbilicals, varying in diameter from 93.2–123.5mm. The application is currently under assessment by the Agency. The application and associated</p>	<p>EAU have undertaken the AA screening determination independent of the assessment by the Agency in relation to the dumping at sea permit applications.</p>

Consultee	Project Specific Comments	Response
	documents can be found at the following link: https://epawebapp.epa.ie/terminalfour/DaS/DaS-view.jsp?regno=S0035-01 .	
Environmental Protection Agency	The Agency would further advise that in considering and deciding on the application that the proposed activity should not result in a contravention of the Water Framework Directive 2000/60/EC, Habitats Directive 92/43/EEC, Birds Directive 2009/147/EC, Marine Strategy Framework Directive 2008/56/EC, Bathing Water Directive 73/160/EEC or Environmental Liabilities Directive 2004/35/EC.	The AA screening assessment by EAU has considered compliance with all Directives relevant to the application.
National Parks & Wildlife Service (Development Applications Unit (DAU))	It must be noted that all cetaceans are listed under Annex IV (including those in Annex II) of Council Directive 92/43/EEC. Accordingly, under Section 51 of the European Communities (Birds and Natural Habitats) Regulations 2011, S.I. No. 477 of 2011, it is an offence to deliberately capture, disturb or kill a cetacean or take actions that result in deterioration or destruction of their breeding sites or resting places. Furthermore, all marine mammals are protected wild animals under the Fifth Schedule of the Wildlife Act (39 of 1976) and Amendments. Under section 23 (as amended in 2000), it is an offence to wilfully interfere with or destroy the breeding place or resting place of any protected wild animal. Introduction of certain sound sources into the marine environment, as may be required during the course of decommissioning as result of routine or exceptional circumstances over the foreshore, have the potential to cause injury and possibly mortality in these species. It is acknowledged that currently envisaged works fall outside of this category. However, in the event that some operations of this nature should arise then the proponents must consider the relevant sections of "Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters". Published by this Department on https://www.npws.ie/sites/default/files/general/Underwater%20sound%20guidance_Jan%202014.pdf	It is considered that the applicant has adequately considered sound sources with respect to disturbance to marine mammals.

3. REVIEW OF APPLICANT AA SCREENING REPORT

Table 3.1 provides a summary of the key project information.

Table 3.1: Project Information

Project Title:	Application for the decommissioning of certain facilities within the Kinsale Area gas fields (incorporating the Kinsale Head gas fields and facilities and the Seven Heads gas field and facilities).
Project Type:	Decommissioning
Applicant:	PSE Kinsale Energy Limited and PSE Seven Heads Limited (collectively referred to herein as the applicant)
Exploration Licence Reference:	Petroleum Lease No 1 (OPL 1 - 1970): Kinsale Head, Southwest Kinsale and Ballycotton Gas Fields. Seven Heads Petroleum Lease (2002): Seven Heads Gas Field.
Date AA Screening Report Received:	<p>14 October 2021 –</p> <ul style="list-style-type: none"> • Report for the purposes of Appropriate Assessment Screening and Article 12 Assessment Screening. 14 June 2018. Ref 253993-00-REP-14; • Appropriate Assessment Screening and Article 12 Assessment Screening Addendum. 8 August 2019. Ref 253993-00-REP-23; and • Appropriate Assessment Screening and Article 12 Assessment Screening Addendum No.2. 30 September 2021. Ref 253993-00-REP-26. <p>31 January 2022 –</p> <ul style="list-style-type: none"> • Addendum to Screening for Appropriate Assessment and Article 12 Assessment. Kinsale Area Decommissioning Project - Pre/Post Rock Placement Surveys. January 2022 <p>26 April 2022 -</p> <ul style="list-style-type: none"> • Appropriate Assessment Screening and Article 12 Assessment Screening Addendum No.2. (Re-issue: 22 April 2022)

3.1 Determining whether a Project should be subject to an Appropriate Assessment

Under Paragraph 42(6) of the Habitats Regulations, the DECC (as the relevant competent authority) shall determine that an AA is required, where it cannot be excluded, on the basis of objective scientific information following screening, that the project, either individually or in combination with other plans and projects, would have a significant effect on a European Site.

Where it is determined that AA is required for the proposed development or project, the applicant must submit a Natura Impact Statement (NIS).

3.2 Description of the Project

The AA screening process involves describing the individual elements of the project that are likely to give rise to impacts on the conservation objectives and/or qualifying features of a Natura site.

Table 3.2 provides a review of the applicant’s description of the project.

Table 3.2: Description of Project AA Checklist

Brief Project Description:

Kinsale Energy is progressing with the decommissioning of the Kinsale Area gas fields and facilities (incorporating the Kinsale Head gas fields and facilities and the Seven Heads gas field and facilities), which have come to the end of their productive life; gas production from the wells ceased on 5th July 2020. The decommissioning of the entirety of the Kinsale Area gas fields and facilities is collectively referred to as the Kinsale Area Decommissioning Project (KADP).

Consent applications are now being made for the remaining works required to complete the KADP - Consent Application no. 3 for Kinsale Head Petroleum Lease (OPL 1) and Consent Application no. 2 for Seven Heads.

Kinsale Head Consent Application no. 3 includes the following:

- To leave *in situ* all infield pipelines and umbilicals associated with the Kinsale Head gas fields
- To leave *in situ* the 24" export pipeline (offshore and onshore section) and to fill the onshore section with grout
- To use engineering materials (rock placement) to protect the pipelines and umbilicals *in situ*

Seven Heads Consent Application no. 2 includes the following:

- To leave *in situ* all infield pipelines and umbilicals associated with the Seven Heads gas field
- To leave *in situ* 18" Seven Heads export pipeline and umbilical
- To use engineering materials (rock placement) to protect the pipelines and umbilicals *in situ*

Rock cover remediation (rock placement) will be required either at the pipe ends and freespan only, or the full length of pipelines (e.g. at areas which are currently not buried or under existing protective material). The depth of rock cover will be at least 0.2 m depth at all points and a maximum of 1m wide berm. Graded rock will be used, and similar to existing rock material specifications.

The consent applications also include the undertaking of post-decommissioning survey activities at sites associated with the Kinsale Head, Ballycotton and Southwest Kinsale fields and the Seven Heads field. In order to accurately record the status of the pipelines and confirm the completion of the pipeline decommissioning activities, pre and post rock placement surveys are proposed as part of the decommissioning Plans.

The survey campaign is proposed to be carried out in phases, between Q2 and Q4 in 2022. However, these works may slip to between Q2 and Q3 2023 due to the potential for delays. The surveys will include the use of equipment (e.g. multi-beam echosounder, sidescan sonar) to characterise the pipeline/umbilicals and the immediately adjacent seabed.

A variety of potential equipment will be used to support the above decommissioning activities (e.g. rigs, heavy-lift vessels (HLV), rock placement vessel with remotely operated vehicle (ROV), construction support (CSV), anchor handling (AHV), platform support (PSV) and guard vessels).

It is anticipated that the decommissioning programme of works is expected to take 12-18 months to complete, however, operations may not be continuous, and overall, it may take up to 10 years for the work to be completed.

A summary of the potential equipment/vessels which may support the decommissioning works and pre and post rock placement surveys are presented in:

- Report for the purposes of Appropriate Assessment Screening and Article 12 Assessment Screening – Table 3.3
- Addendum to Screening for Appropriate Assessment and Article 12 Assessment (KADP Pre/Post Rock Placement Surveys, January 2022) - Table 2.1.

Project Element	Have these features of the project been identified by the applicant? (If not, please provide details)
Spatial Extent (size, scale, area etc)	Yes – The applicant has described the spatial extent of the actual works satisfactorily with respect to the decommissioning options. In the re-submitted Addendum No. 2 (Report for the Purposes of AA Screening and Article 12 Assessment Screening No.2 (Re-issue: 22 April 2022)), the Zone of Influence (ZoI) for screening in for seabirds for those relevant SPAs are now correctly made based on available foraging range data (e.g. Woodward <i>et al.</i> , 2019).
Supporting Infrastructure	Not applicable – No supporting infrastructure is directly required for this project. The Kinsale Head and Seven Heads infrastructure is already in place.
Transportation Requirements	Yes - The vessels that will be used for the decommissioning and survey/rock placement works have been identified.
Physical changes that will result from the project (e.g. from excavation, dredging)	Yes - A detailed methodology has been provided of all the planned decommissioning operations. The overall aim of the project is to adhere to OSPAR 98/3 and all decommissioning options for pipeline and umbilical decommissioning were subject to a number of technical and environmental studies via the Comparative Assessment process. The physical changes are to return the area to the condition it was prior to development, with the exclusion of pipeline, umbilicals and protection materials which will be left <i>in situ</i> . The survey equipment that will be used will have no interaction with the seabed. The only change will be as a result of the rock placement required as a result of the identified free spanning. The likely length requiring rock placement has been identified.
Emissions and Waste	Yes - Waste and atmospheric and noise emissions to be generated by the decommissioning activities and pre/post rock placement surveys have been adequately summarised by the applicant. MARPOL will be complied with
Resource Requirements (e.g. water abstraction)	Yes – The resource requirements are standard for survey vessel operations and are considered to be minimal.
Duration of each phase <i>e.g.</i> <ul style="list-style-type: none"> • <i>Phase 1 Construction</i> • <i>Phase 2 Operation</i> • <i>Phase 3 Decommissioning</i> 	Yes - The entire project is phase 3, decommissioning. There will be a level of preparatory works which will be completed <i>in situ</i> and be part of the Cessation of Production (CoP) process. It is anticipated that the decommissioning programme of works is expected to take 12-18 months to complete, however operations may not be continuous, and overall it may take up to 10 years for the work to be completed. The pre and post rock placement surveys will both take approximately 14 days respectively and the anticipated schedule was included within the application.

The AA screening must consider the effects of the proposed development in combination with other plans and other projects in making the screening assessment.

Table 3.3 provides a review of the in-combination assessment undertaken by the applicant.

Table 3.3: In-combination Assessment

Brief Description of identified plans / projects that might act in-combination (Operational, Consented and Proposed projects) with the proposed project:
The applicant’s AA Screening Report considers the following projects that might act in-combination with the proposed project:

1. Existing oil and gas lease areas and potential offshore oil & gas related exploration activity;
2. The Hibernia Atlantic “D” and Hibernia Express subsea cables;
3. Marine dredge disposal;
4. Commercial shipping;
5. Fisheries;
6. Ireland France subsea cable;
7. Eirgrid Celtic interconnector.

Within Addendum No. 2 and =Addendum No. 3 the following plans/projects have been considered:

8. Two Foreshore Licences have been applied for in relation to offshore wind farm site investigation work in the territorial waters off Cork. The application most of relevance to the KADP is for the Emerald project, though there is some overlap with the Inis Ealga project area in close proximity to shore. There is the potential for interaction between the timings of these surveys and work associated with the decommissioning of the export pipeline. The duration and scale of the works (up to 16 days for all KADP pipelines) are such that there is considerable scope to avoid interactions.
9. The wind farm proposals associated with the above site investigations are at a conceptual stage; no consent application for either development has been made, and no approvals have been granted. In the absence of project information, the applicant cannot make an in-combination assessment conclusion.

The applicant has submitted a detailed fisheries assessment to support assessment of the pre/post rock placement surveys.

It is agreed that due to the predicted scale, intensity and duration of the survey activities as well as the stakeholder engagement that has occurred and is planned to occur, that the survey activities will not result, directly or indirectly, in likely significant adverse effects on fisheries, alone or cumulatively with other existing or approved projects.

Project Element	Is the predicted magnitude / extent of identified likely in-combination effects considered by the applicant?	Summary
Spatial Extent (define boundaries for examination of in-combination effects)	Yes	The applicant has not explicitly stated a distance used for screening of other plans and projects. However, based on typical foraging and migratory ranges for qualifying features of European designated sites the projects considered are considered sufficient to screen in/out in-combination effects for the purposes of the review of the applicant’s AA Screening Report.
Impact Identification (e.g. noise, chemical emissions etc.)	Yes	The applicant has considered potential in-combination effect with identified plans and projects arising from physical presence, underwater noise and vibration, discharges to sea and accidental events. However, the likelihood of such eventuality occurring is rated as low in terms of potential impact on or affecting the integrity of European sites and their qualifying features.

Pathway Identification (e.g. via water, air etc)	Yes	Pathways are via water e.g. underwater noise.
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3.3 Identification of relevant European sites and species

The applicant's AA Screening Report and AA Screening Report Addenda consider the designated European sites that may be impacted by the project, including consideration of direct, indirect and in combination effects. As projects that lie out with European sites may still have an impact upon their integrity, particularly in a marine environment where the environment is extremely dynamic and species may be highly mobile, identifying potential zones of influence surrounding the European sites is a key component.

Appendix 1 identifies the relevant European Sites and species that might be impacted by the project. The relevant sites in the report have been reviewed and the applicant meets the requirements of:

- Identifying the Natura Site / Annex IV species;
- Listing the qualifying interests / Annex IV species;
- Considering direct impacts to the Natura site / Annex IV species;
- Considering indirect impacts to the Natura site / Annex IV species;
- Considering potential zones of influence on the Natura site / Annex IV; and
- The consideration of in combination effects.

3.4 Screening for Appropriate Assessment of Likely Significant Effects on Natura sites and adverse effects on Annex IV species.

Table 3.5 provides a summary of the likely significant effects identified for the project alone and in combination with other projects considering, *inter alia*, the characteristics and specific environmental conditions of the sites concerned by the relevant project and the project location.

Table 3.5: Assessment of Likely Significant Effects AA Screening

Summary of likely significant effects
<p>The applicant's AA Screening Report and AA Screening Report Addenda identified the following impact sources for further consideration in the determination of likely significant effects on Natura sites and protected features.</p>
<p>Decommissioning works</p> <ul style="list-style-type: none">• the physical presence of vessels in the field and in transit;• underwater noise from vessels, cutting, rock placement and post-decommissioning survey (note that no explosive cutting is proposed);• physical disturbance from rig placement, rig and vessel anchoring, and infrastructure removal and rock placement;• discharges to sea;• accidental events;• waste recycling, reuse and disposal;• atmospheric emissions.
<p>Physical presence of vessels on birds</p> <p>Vessels in the area may potentially cause displacement and/or other behavioural responses in bird species.</p> <p>Most species from those relevant SPAs within the foraging range of the Project will have a low to moderate sensitivity to this disturbance (northern gannet, fulmar, common guillemot, kittiwake, Manx shearwater and gulls).</p> <p>For rafting birds that may move in response to vessels, it was determined that such effects would be negligible overall.</p> <p>For seaducks and other waterbird flocks, there may be disturbance from vessel traffic. In consideration of the distance of the Project from where flushing of birds could occur, there is a limitation in the potential interaction that could occur in coastal sites such as Cork Harbour SPA. However, with acknowledgement that interaction may occur with overwintering species (cormorant, red-breasted merganser). Any interaction will be limited as inshore activities will be of short duration, temporary and incremental.</p> <p>It was determined that no likely significant effects will occur.</p>
<p>Underwater noise on diving birds</p> <p>It is stated that there is limited information on the effects of anthropogenic noise on diving birds, but that direct effects may cause physical damage to species. It was assessed that despite limited data, and the importance of diving birds in the region of the Project, that given the nature of the potential sound sources, and the limited footprint and duration of works, that no likely significant effects will occur.</p> <p>, The following effects were subsequently discounted from the AA Screening:</p> <ul style="list-style-type: none">• Physical disturbance:<ul style="list-style-type: none">○ Activities do not take place within any Natura 2000 sites and are approximately 8 km from the nearest site designated for Annex I seabed habitat (Great Island Channel SAC);

- Recent benthic sampling/imagery surveys in the Kinsale Area have been consistent in reporting no indication of sensitive species/habitats.
- **Water recycling, reuse and disposal:**
 - Wastes generated by the KADP will be managed in accordance with the relevant waste legislation requirements and recovered or disposed of in appropriated licensed waste facilities, and will not cause a significant impact on Natura 2000 sites;
- **Atmospheric emissions:**

overall significance of the impact of atmospheric emissions from the project is considered to be low and will not cause a significant impact on Natura 2000 sites.

Within Table 2.3 of the re-issued Report for the Purposes of Appropriate Assessment Screening and Article 12 Assessment Screening Addendum No.2 (22 April 2022), the relevant SPAs and their qualifying interests are all listed and screened (as a *Yes* or *No*) against the two effect categories of physical presence of vessels, and underwater noise for further consideration.

In-Combination Effects

No potential likely significant in-combination effects are predicted from the offshore decommissioning works with other projects or plans.

Pre/Post Rock Placement Surveys

- Physical presence of survey vessels;
- Underwater noise including from the vessel and survey equipment.

No Natura 2000 sites are located within the survey area. As such, the assessments have focussed on relevant mobile species that may interact with the activities (seabirds, marine mammals and fish). See KADP Pre/Post Rock Placement Surveys Addendum (January 2022) Table 3.2 for SACs, and Table 3.4 for SPAs for list of sites considered for further assessment.

The relevant SACs included those sites where waterbirds (seaduck and other waterbird flocks) and seabirds are a designated feature. See KADP Pre/Post Rock Placement Surveys Addendum (January 2022) Table 3.3 for full list of seabirds identified for further assessment.

Relevant SACs included those sites where the marine mammals species (harbour porpoise, grey seal, and harbour seal) are a designated feature.

Relevant SACs included those sites where the following Annex II migratory fish species are a designated feature and included Atlantic salmon, sea and river lamprey, twaite shad.

Physical presence of survey vessels

Birds - It is described that vessels in the area may temporarily cause disturbance to birds from relevant SPA sites. Seaducks and other waterbird flocks (common scoter), may be disturbed, which may result in repeated disruption of feeding, loafing and roosting (e.g. in coastal areas such as Cork Harbour SPA). Divers are also sensitive to vessel disturbance.

Seabirds species such as gulls, fulmar and kittiwake were determined to be less sensitive to such activities, whereas razorbill, cormorant and guillemot have moderate sensitivity. Overall, it was determined that **no likely significant effects** will occur.

Fish and Marine Mammals - Collisions from vessels is identified as the primary source of potential effects to marine mammals. The presence of vessels may affect the distribution and movements of both marine mammals and migratory fish. Overall, it was determined that **no likely significant effects** will occur.

Underwater noise including from the vessel and survey equipment

Birds - It is described that there is limited information on effects on anthropogenic noise on diving birds, but that direct effects may cause physical damage to species. Deeper-diving species (e.g. auks) may be at most risk of exposure. Table 3.1 in the KADP Pre/Post Rock Placement Surveys Addendum (January 2022) provides a list of relevant migratory and /or Article 4 diving bird species considered potentially vulnerable. Overall, it was determined that in consideration of the sound source characteristics, the small spatial footprint, and short duration of planned surveys that **no likely significant effects** will occur.

Marine Mammals - Reference is made to the UK Offshore Energy Sea (DECC, 2016) conclusion that the characteristics of noise sources emitted from geophysical survey equipment (e.g. sub-bottom profilers) will result in negligible effects, however, with acknowledgment that there is a high level of uncertainty overall. There may be localised disturbances within a few hundred meters of the source, and a short-term and temporary decrease in densities of certain species within a 10km range of a survey being undertaken. Vessel movements may also disturb foraging activities by marine mammals within or close to designated sites. Harbour porpoise was identified as most likely to occur in the survey area. In consideration of source characteristics and propagation, it was determined that for all marine species, any effects will be negligible for both risk of injury and behavioural disturbance, and **no likely significant effects** will occur.

Fish - Potential effects on migratory diadromous fish are discussed, where it is stated there is limited empirical evidence available, but that salmonids and eels are sensitive to particle motion. In consideration of the characteristics of potential noise sources, the small spatial footprint and short duration of the surveys, the risk of injury to any fish species will be remote, and significant effects to any fish species will be low, and as such, **no likely significant effects** will occur.

Within Table 4.1 of the KADP Pre/Post Rock Placement Surveys Addendum (January 2022) the relevant SACs and SPAs, and their qualifying interests are all listed and screened (as a Yes or No) against the two effect categories of physical presence of vessels, and underwater noise for further consideration.

In-combination Effects

Fisheries and shipping activities may cause an in-combination effect, however, it was assessed that the additional vessels from the survey is not considered significant. Overall, no potential likely significant in-combination effects are predicted from the pre/post-rock placement surveys, with other projects or plans.

Do you agree with the applicant's AA screening assessment? Why?

Decommissioning Works

It is agreed that the impacts to Annex IV species (fish and mammals) and Article 4 species (birds) as a result of the decommissioning works are considered to be negligible/extremely low and therefore significant effects are considered to be unlikely.

During the time that the initial screening and the subsequent addenda have been issued supporting literature has been updated and the applicant has acknowledged this with respect to underwater noise and the impact on marine mammals (the use of Southall *et al.*, 2019 within Addendum No. 2 for example). The original screening assessment contains a detailed consideration of the impact sources identified for further consideration. Within the Addendum No. 1 a much more detailed appraisal considerably more fit for purpose than the original appraisal is provided. Subsequently three SACs were taken through to be considered with the AA screening. It is agreed that these three sites alone needed to be taken forward and a detailed assessment was made.

Furthermore, following the DECC's request for further information (8 April 2022), the applicant re-issued Addendum No. 2 (22 April 2022), and included additional information that further supported

the screening assessment. This re-issued Addendum included a rationale for why otters, a designated feature of certain sites, had not been carried through to the assessment, and applied specific breeding seabird foraging ranges for species, as described by Woodward *et al.* (2019). The revision of the criteria for screening SPA sites, based on Woodward *et al.* (2019) (rather than based on the previously applied 100 km) has now been adequately undertaken by the applicant.

Pre/Post Rock Placement Surveys

It is agreed that the impacts as a result of the planned survey works to Annex IV species are considered to be negligible/extremely low and therefore significant effects are considered to be unlikely.

As no seismic noise sources (e.g. airguns, sparkers or boomers) will be used during survey operations it is agreed that there is not a requirement for mitigation measures. However, it has been further stated in the Addendum for the Pre/Post Rock Placement Survey (January 2022), that vessels surveying within inshore areas, will follow those measures outlined in the Department of Arts, Heritage and the Gaeltacht’s 2014 ‘Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters’.

The re-issued Addendum No. 2 (22 April 2022), included additional information that further supports the screening assessment which includes a rationale for why otters, a designated feature of certain SAC sites, had not been carried through to the assessment.

3.5 Screening Determination

If significant effects are certain, likely or uncertain then the DECC must request the applicant provides a NIS in order for the DECC to undertake an AA as the competent authority. The applicant may also choose to recommence the screening process with a modified project that removes or avoids elements that posed risks of likely significant effects.

Tables 3.6 and 3.7 provide a summary of Ramboll’s recommendation to enable the DECC to make a screening determination.

Table 3.6: Summary of Applicant’s Screening Report Review

Is the plan or project directly connected with or necessary to the nature conservation management of the Natura site?	No
Is the project or plan likely to have significant effects on the environment?	It can be concluded that the planned survey operations are NOT likely to have a significant effect in the environment.
Is an AA required? (Yes / No / More Information Required?)	Following review of all documentation submitted by the applicant, it can be confirmed that an AA is not required.
What further information is required to inform AA Screening Opinion (if any)?	Following receipt and review of the applicant’s response to the DECC’s Request for Further Information it can be confirmed that no further information is required.

Table 3.7: Recommendation of Screening Determination

Outcome of Screening Report Assessment	Overall Screening Opinion / AA Required?
No Likely Significant Effects on Natura Sites identified, or project is directly connected with or necessary to the nature	No likely significant effects on European Sites have been identified, having had regard to the potential connectivity with sites, relevant conservation objectives and the potential for in

Outcome of Screening Report Assessment	Overall Screening Opinion / AA Required?
conservation management of the Natura site.	combination effects and will not cause significant disturbance to Annex IV and Article 4 (bird) species described. Appropriate Assessment is not required.
Likely or Potential Likely Significant Effects on Natura Sites identified, and project is not directly connected with or necessary to the nature conservation management of the Natura site.	Appropriate Assessment is required because it cannot be excluded, on the basis of the initial assessment (AA screening) provided by the applicant, that the project will have either individually or in combination with other plans or projects a likely significant effect on European sites.

APPENDIX A: IDENTIFICATION OF RELEVANT EUROPEAN SITES/SPECIES AA SCREENING CHECKLIST

Table 1: Identification of Relevant European Sites/Species AA Screening Checklist

Sites presented in Appendix A of the applicant's AA Screening Report and within the AA Screening Report Addenda have been cross referenced against current lists of Natura sites – no omissions of relevant sites have been determined. On this basis the list of sites presented by the Applicant has been considered below.

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Ardmore Head SAC (002123)	40	Yes	Yes	Yes	Yes	Yes	Yes	Qualifying features are terrestrial and therefore not relevant to the plan/project
Ballymacoda (Clonpriest & Pillmore) SAC (000077)	17	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are distant from KADP activities (at least 17km) and when considered in relation to the footprint of these activities and the sheltered nature of the site with respect to the offshore pipeline, there is

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								no foreseeable interaction.
Barley Coveto Ballyrisode Point SAC (001040)	95	Yes	Yes within Addendum No. 2, but not the original submission	Yes	Yes	Yes	Yes	KADP will not affect those site attributes or related targets set for each qualifying interest towards achieving the conservation objectives of maintaining or restoring favourable conservation status as appropriate. The site was therefore not considered to be relevant beyond its initial identification as being within the ZoI and was excluded from further assessment.
Blackwater River (Cork/Waterford) SAC (002170)	26	Yes	Yes	Yes	Yes	Yes	Yes	The potential for interaction with KADP activities and the sensitivities of the species interest features of the site identified

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								above are such that the site was considered in the AA screening.
Clonakilty Bay SAC (000091)	45	Yes	Yes	Yes	Yes	Yes	Yes	The site was not considered to be relevant beyond its initial identification as being within the ZoI and was excluded from further assessment.
Courtmacsherry Estuary SAC (001230)	32	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least 32km), and when considered in relation to the footprint of these activities and the nature of the qualifying interests, there is no foreseeable interaction.

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Great Island Channel SAC (001058)	8	Yes	Yes	Yes	Yes	Yes	Yes	No interactions between offshore KADP activities and the qualifying interests of the site were identified. In view of the distance of the site to the nearest onshore works (8km), the potential for an effect to occur in relation to dust emissions associated with terminal demolition works was considered further in the AA screening.
Helvick Head SAC (000665)	57	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least 57km), and the nature of the qualifying interests are such that there is no foreseeable interaction.

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Hook Head SAC (000764)	82	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least 82km), and when considered in relation to the footprint of these activities and the nature of the qualifying interests, there is no foreseeable interaction.
Kilkeran Lake and Castlefreke Dunes SAC (001061)	56	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (56km), and when considered in relation to the footprint of these activities and the nature of the qualifying interests, there is no foreseeable interaction

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Lough Hyne Nature Reserve and Environs SAC (000097)	69	Yes - Relevant ones have been	Yes - Relevant ones have been	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least 69km), and when considered in relation to the footprint of these activities, there is no foreseeable interaction
River Barrow & River Nore SAC (002162)	92	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least 92km for export pipeline, and beyond the ZoI for all others) and when considered in relation to the footprint of these activities, there is no foreseeable interaction
Roaringwater Bay and Islands SAC (000101)	73	Yes	Yes	Yes	Yes	Yes	Yes	Given the potential for qualifying interest species (e.g. harbour

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								porpoise and grey seal) to be present in the KADP area, and their relative sensitivity to certain sources of effect (e.g. noise), the site was included for further assessment in the AA Screening Report.
Tramore Dunes and Backstrand SAC (000671)	80	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least 80km for export pipeline, and beyond the ZoI for all others) and when considered in relation to the footprint of these activities, there is no foreseeable interaction.
Bandon River SAC (002171)	69	Yes	Yes	Yes	Yes	Yes	Yes	The site qualifying interests are some distance from KADP activities (at least

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								69km), and when considered in relation to the footprint of these activities, there is no foreseeable interaction.
Mid-Waterford Coast SPA (004193)	55	Yes	Yes	Yes	Yes	Yes	Yes	This coastal site and its qualifying interests are some distance from the KADP activities, and when considered in relation to the footprint and relative sensitivity of features, of these activities, there is no foreseeable interaction or likelihood of effect.
Sovereign Islands SPA (004124)	16	Yes	Yes	Yes	Yes	Yes	Yes	This coastal site and its qualifying interests are some distance from the KADP activities, and when considered in relation to the footprint and relative sensitivity of features, of these

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant’s consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								activities, there is no foreseeable interaction or likelihood of effect.

Table 2: Identification of Relevant European Sites/Species AA Screening Checklist for the pre/post rock placement survey

Sites presented in Appendix A of the applicant's AA Screening Report and within the AA Screening Report Addenda have been cross referenced against current lists of Natura sites – no omissions of relevant sites have been determined. On this basis the list of sites presented by the Applicant has been considered below.

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Roaringwater Bay and Islands SAC (000101)	73 km	Yes	Yes –	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise and have screened these in for grey seals and harbour porpoise.
Blasket Islands SAC (0002172)	188 km	Yes	Yes	Yes	Yes	Yes	Yes	Due to the distance of 188 km from the site acceptable that grey seal was screened out. Have considered physical presence of vessels and underwater noise and have screened harbour porpoise in for both.
Rockabill to Dalkey Island SAC (0003000)	260 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise and

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								have screened both in for harbour porpoise and have been considered appropriately.
Bandon River SAC (0002171)	69 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise. In view of the qualifying interest dependency (pearl mussel) on a potentially noise sensitive feature (Atlantic salmon), the potential for likely significant effect is considered further and appropriately.
Blackwater River (Cork/Waterford) SAC (0002170)	26 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise and have been screened in for a number of species

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								and have been considered appropriately.
River Barrow and River Nore SAC (0002162)	92 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise and have been screened in for a number of species and have been considered appropriately.
Lower River Suir SAC (0002137)	52 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise and have been screened in for a number of species and have been considered appropriately.

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Slaney River Valley SAC (0000781)	123 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise and have screened in a number of species (e.g. Atlantic salmon, sea lamprey) for both. Although the distance from the sites is 123 km, in consideration of the migratory behaviour of sensitive species there is the potential for interaction with the presence of vessels and underwater noise.
Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC (UK0030396)	185 km	Yes	Yes	Yes	Yes	Yes. Agree with ranges used	Yes	Have considered physical presence of vessels and underwater noise and have screened in both for harbour porpoise and have been considered appropriately.

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North Anglesey Marine /Gogledd Môn Forol SAC (UK0030398)	294 km	Yes	Yes	Yes	Yes	Yes. Agree with ranges used	Yes	Have considered physical presence of vessels and underwater noise and have screened both in for harbour porpoise and have been considered appropriately.
West Wales Marine/Gorllewin Cymru Forol SAC (UK0030397)	166 km	Yes	Yes	Yes	Yes	Yes. Agree with ranges used	Yes	Have considered physical presence of vessels and underwater noise and have screened both in for harbour porpoise and have been considered appropriately.
North Channel SAC (UK0030398)	368 km	Yes	Yes	Yes	Yes	Yes. Agree with ranges used	Yes	Have considered physical presence of vessels and underwater noise and have screened both in for harbour porpoise and have been considered appropriately.

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Saltee Islands SPA (0004002)	112 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered both physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Puffin Island SPA (0004003)	150 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered both physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Cliffs of Moher SPA (0004005)	310 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered both physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.

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Skelligs SPA (0004007)	160km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Blasket Islands SPA (0004008)	187 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Old Head of Kinsale SPA (0004021)	25 km	Yes – Northern fulmar, herring gull, and razorbill considered as additional species	Yes – Northern fulmar, herring gull, and razorbill considered as additional species	Yes	Yes	Yes	Yes	There is the potential for interactions between diving seabird species (guillemot, razorbill) which are potentially sensitive to underwater noise, and the survey activities. This is considered further. Have also considered physical presence of

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
								vessels when relevant to individual species and have been considered appropriately.
Ballycotton Bay SPA (0004022)	11 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels. There is the potential for interactions between diving seabird species (guillemot, razorbill) which are potentially sensitive to underwater noise, and the survey activities. This is considered further and appropriately.
Ballymacoda Bay SPA (0004023)	21 km	Yes	Yes	Yes	Yes	Yes	Yes	None of the qualifying interests are diving seabirds which are likely to be most at risk of any underwater noise effects, and therefore no interactions with the

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								survey are considered to be possible. Physical presence of vessels and has been considered appropriately.
Blackwater Estuary SPA (0004028)	28 km	Yes	Yes	Yes	Yes	Yes	Yes	None of the qualifying interests are diving seabirds which are likely to be most at risk of any underwater noise effects, and therefore no interactions with the survey are considered to be possible. Have considered physical presence of vessels and has been considered appropriately.
Courtmacsherry Bay SPA (IE0004219)	31 km	Yes	Yes	Yes	Yes	Yes	Yes	None of the qualifying interests are diving seabirds which are likely to be most at risk of any underwater noise effects,

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								and therefore no interactions with the survey are considered to be possible. Have considered physical presence of vessels and has been considered appropriately.
Cork Harbour SPA (0004030)	5 km	Yes	Yes	Yes	Yes	Yes	Yes	There is the potential for interactions between a diving species (cormorant, red-breasted merganser) which are potentially sensitive to underwater noise, and the survey activities, which is considered further. Have also considered physical presence of vessels.

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Dungarvan Harbour SPA (0004032)	47 km	Yes - Lesser black-backed gull included as an additional species	Yes - Lesser black-backed gull included as an additional species	Yes	Yes	Yes	Yes	None of the qualifying interests are diving seabirds which are likely to be most at risk of any underwater noise effects, and therefore no interactions with the survey are considered to be possible. Have considered physical presence of vessels and when relevant to individual species and have been considered appropriately.
The Bull and The Cow Rocks SPA (0004066)	136 km	Yes - Northern fulmar and black-legged kittiwake considered as	Yes - Northern fulmar and black-legged kittiwake considered as	Yes	Yes	Yes	Yes	Have considered both physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.

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		additional species	additional species					
Lambey Island SPA (0004069)	282 km	Yes - Manx shearwater considered as an additional species	Yes - Manx shearwater considered as an additional species	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Tacumshin Lake (SPA) (0004092)	124 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Kilcolman Bog SPA (0004095)	124 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.

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Howth Head Coast SPA (0004113)	270 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Illaunonearaun SPA (0004114)	269 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Loop Head SPA (0004119)	260 km	Yes - Northern fulmar considered as an additional species	Yes - Northern fulmar considered as an additional species	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.

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Ireland's Eye SPA (0004117)	274 km	Yes - Northern fulmar and northern gannet considered as additional species	Yes - Northern fulmar and northern gannet considered as additional species	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Skerries Islands SPA (0004122)	294 km	Yes - Northern fulmar considered as an additional species	Yes - Northern fulmar considered as an additional species	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Magharee Islands SPA (0004125)	238 km	Yes - Northern fulmar considered as an additional species	Yes - Northern fulmar considered as an additional species	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.

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Wicklow Head SPA (0004127)	227 km	Yes - Northern fulmar considered as an additional species	Yes - Northern fulmar considered as an additional species	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further
Dingle Peninsula SPA (0004153)	196 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Iveragh Peninsula SPA (0004154)	147 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.

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Beara Peninsula SPA (0004155)	123 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Sheep's Head to Toe Head SPA (0004156)	65 km	Yes - Northern fulmar considered as an additional species	Yes - Northern fulmar considered as an additional species	Yes	Yes	Yes	Yes	Fulmar, while having the potential to forage within range of the survey area (see Woodward <i>et al.</i> 2019), are regarded to have a low sensitivity to shipping traffic (Garthe & Hüppop 2004, Fließbach <i>et al.</i> 2019). However, in view of the potential for interaction, this is considered further. Have also considered physical presence of vessels when relevant to individual species

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Deenish Island and Scariff Island SPA (0004175)	146 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Kerry Head SPA (0004189)	254 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species. Underwater noise has not been taken further.
Galley Head to Duneen Point SPA (0004190)	48 km	Yes - Northern fulmar and herring gull identified for further considerations.	Yes - Northern fulmar and herring gull identified for further consideration.	Yes	Yes	Yes	Yes	None of the qualifying interests are diving seabirds which are likely to be most at risk of any underwater noise effects, and therefore no interactions with the survey are considered to be possible.

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								Have also considered physical presence of vessels to individual species
Seven Heads SPA (0004191)	34 km	Yes - Herring gull identified for further consideration.	Yes - Herring gull identified for further consideration.	Yes	Yes	Yes	Yes	Herring gull is not a diving seabird likely to be most at risk of any underwater noise effects, and therefore no interactions with the survey are considered to be possible. Have also considered physical presence of vessels when relevant to individual species
Helvick Head to Ballyquin SPA (0004192)	39 km	Yes - Northern fulmar, common guillemot, and razorbill	Yes - Northern fulmar, common guillemot, and razorbill	Yes	Yes	Yes	Yes	There is the potential for interactions between a diving seabird species (guillemot, razorbill) which is potentially sensitive to underwater noise, and the survey

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
		identified for further consideration	identified for further considerations.					activities, which is considered further. Have also considered physical presence of vessels relevant to individual species
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA (UK9014051)	131 km	Yes	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Grassholm SPA (UK9014041)	174 km	Yes – Northern gannet identified for further considerations.	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.
Irish Sea Front SPA (UK9020328)	315 km	Yes – Manx shearwater considered for further	Yes	Yes	Yes	Yes	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
		consideration.						species and have been considered appropriately.
Aberdaron Coast and Bardsey Island SPA (UK9013121)	254 km	No - Chough is not included, however, any interaction with the planned activities are unlikely (due to the distance of 254 km from the Project Site).	No - Chough is not included, however, any interaction with the planned activities are unlikely (due to the distance of 254 km from the Project Site).	Yes	Yes	Yes	Yes	Whilst Chough (a coastal bird species and member of the crow family) had not been listed by the applicant, any interaction with planned activities with this designated feature are unlikely, due to distance of the SPA from the Project Site. Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.

Natura site/ Annex IV species identified by assessor	Distance from Project Site (km)	Are the Natura site / Annex IV species identified by the applicant?	Are all the qualifying interests / Annex IV listed by the applicant?	Are direct impacts to the Natura Site / Annex IV species considered by the applicant?	Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?	Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?	Are in combination effects considered by the applicant?	Briefly summarise whether the applicant's consideration of relevant Natura sites / Annex IV species which may be affected by the proposed project, meets the requirements for a screening opinion:
Copeland Islands SPA (UK9020291)	442 km	No - Arctic tern not included.	No - Arctic tern not included	No - Have not considered Arctic tern. However, any interaction with the planned activities are unlikely in consideration of its foraging ranges.	No - Have not considered Arctic tern. However, any interaction with the planned activities are unlikely in consideration of its foraging ranges.	Yes - Manx shearwater assessed	Yes	Have considered physical presence of vessels and underwater noise when relevant to individual species and have been considered appropriately.

APPENDIX B: GENERAL CONSULTATION RESPONSES

General comments on climate, energy storage and environmental impacts

- It is considered that the Kinsale Area gas field pipelines to be potential national strategic assets essential to Ireland’s security of energy supply, net zero commitments and future offshore wind resource development.
 - Ireland currently imports ~60% of its natural gas and 100% of its oil consumption. The only Irish indigenous gas production is from the Corrib gas field which is expected to cease production by the end of the decade.
 - Ireland has no large-scale natural gas storage capacity since the closure of the SW Kinsale gas storage facility in 2017. Imported natural gas enters Ireland via a single entry point at Moffat, Scotland, which post-Brexit now lies outside the EU in a ‘third country’ jurisdiction. Natural gas power production is currently the cleanest baseload support for balancing Ireland’s increasing intermittent renewable energy generation capacity.
 - In order for Ireland to decarbonise its non-power generation sectors such as heavy transportation, industry, shipping and heating, it is clear that molecules such as green hydrogen and hydrogen carriers will be required in the national energy mix. These molecules can be generated using renewable sources such as wind and solar during times of peak generation when the grid is over-supplied. Large-scale storage of these molecules will be required to balance the energy load and manage Ireland’s renewable energy resources.
 - Ireland possesses the highest average sustained wind speeds in the European Union. The Sustainable Energy Authority of Ireland (SEAI) estimates that €100-200 billion of investment in Irish offshore wind will occur by 2050 supporting the development of over 40 GW of generation capacity. Wind Energy Ireland, the industry advocacy group, recently reported that c. 22 GW of capacity is already in development. Such significant, albeit intermittent, energy generation capacity would exceed Irish domestic market consumption and drive the requirement for large scale energy storage capacity development.
- As Ireland moves forward with its ambitious plan to achieve its climate and de-carbonisation objectives by 2050, unprecedented changes will be required within the energy industry in Ireland over what is a relatively short period of time (30 years).
- As the DECC is only too aware, Ireland has an acute short-term and longer-term issue to ensure that it can deliver on its core objectives of:
 - Energy Security & System Resilience
 - Net Zero
 - Affordable Energy
 - Energy Independence
 - Wind Energy Resource Development
- To achieve these objectives, a host of solutions are required including but not limited to increased renewables penetration, energy system upgrades, more interconnectivity, consumer behaviour changes and integrated energy management, whilst ensuring that Ireland also has in place vital energy security of supply.
- dCarbonX see large-scale energy storage as a key requirement as Ireland moves forward. With indigenous gas production falling, and with the Kinsale gas storage facility now

General comments on climate, energy storage and environmental impacts

decommissioned, Ireland has no large-scale indigenous gas storage capacity. Whilst it is acknowledged that batteries may help provide some measures of storage capacity for the electricity grid, Ireland has no large-scale energy storage capacity.

- As part of the Energy Transition, dCarbonX see a significant future role for green hydrogen / hydrogen carriers produced from Ireland’s exceptional wind energy resources. The joint venture with the ESB for green hydrogen storage provides a staged pathway to achieve this, including the recently announced Green Hydrogen @ Kinsale project. dCarbonX have completed a new proprietary study of the energy storage potential using hydrogen / hydrogen carriers in the reservoirs of the Kinsale Area gas fields. This study indicated that the area has the potential to host c. 3 TWh of energy storage capacity with significant further upside potential.

It is clear that hydrogen / hydrogen carriers and their safe storage will play a pivotal role in delivering Ireland’s decarbonisation plans whilst providing indigenous energy security of supply. Long-term hydrogen / hydrogen carriers will provide affordable resilient energy and represents a transformational export opportunity in the decades ahead.

General comments on policy and securing future energy supply

- Kinsale Head Petroleum Lease (OPL1) Consent Application No 3 is made on the basis that it is the position of DECC “that arrangements are not to be made to provide for the future use of the pipelines”.
- The refusal by DECC, on 30th October 2020, of Predator Oil and Gas Holdings PLC’s request of 20th October 2020 for a virtual meeting to discuss the ownership and access to the Kinsale pipeline and the decision by DECC to inform KEL that arrangements are not to be made to provide for the future use of the pipeline, potentially represents, in legal terms, an attempt at constructive termination of parts of Predator Oil and Gas Holdings PLC’s long-established business in Ireland.
- DECC should consider adopting a Defferral and Phased Decommissioning approach as practiced in the UK. This approach recognises that disused facilities including pipelines may represent important infrastructure. Where a specific opportunity has been identified deferral of decommissioning can be considered.
- Alternatively, DECC might consider adopting an Interim Pipeline Regime as practised in the UK. The Interim Pipeline Regime is intended to ensure out of use lines do not pose a risk to other users of the sea or the environment and that they are covered by an appropriate surveying and maintenance regime from the point where they are taken out of use by one operator until approval of the final decommissioning programme of another operator.
- The PSE KEL Consent Letter states that following discussions with DECC regarding potential future use of the facilities, it was the position of the Department that Consent Application No. 3 should be submitted on the basis that arrangements are not to be made to provide for the future use of the pipelines. Did the Department consider the Mag Mell FSRU Project in reaching this position, given that Mr Paul Griffiths on 20th October 2020 requested by letter a meeting with DECC to discuss the ownership and access to the Kinsale pipeline?

DECC’s letter of 30th October 2020 clearly states that “the Department is conducting a review of the security of energy supply of Ireland’s electricity and natural gas systems... The review will consider a wide range of options including energy storage, additional gas

General comments on climate, energy storage and environmental impacts

import capacity (including LNG terminals)... The outcome of the review will inform future policy considerations including the future use of the Kinsale Head gas field and such decisions will not be made in advance of the outcome of the review of energy security". The contract to undertake a Technical Analysis to inform a Review of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems was awarded to CEPA on 24th March 2021. The RFT timelines said that the draft version of the supplementary report (the third report) would be issued within 11 months of commencing the project and the final version within 12 months of commencing the project. The final report is expected Q2 2022. It is therefore clearly premature for DECC to approve consent to fill the onshore section of the 24" export pipeline with grout. Indeed the current Licensing Terms for Offshore Oil and Gas Exploration, Development & Production 2007 empowers the Minister to require the owner of facilities to enter into discussions ...on the utilisation of facilities with persons in addition to the owner.

KEL's Consent Application 2 of August 2019 states that a leave *in situ* option, particularly with regard to the main 24" export pipeline and landfall, could facilitate the re-use of the pipeline infrastructure in the future.

Preliminary studies into the use of the Kinsale Head reservoir and facilities for CCS have been undertaken by Ervia and these indicate that re-use of the platform jackets as part of a CCS project is not viable, although the 24" export pipeline could possibly be re-used.

- It should be noted that GNIs and Eirgrids' 'Long Term Resilience Study 2018' concluded that the most economically advantageous option for Ireland to enhance its security of supply is a floating LNG terminal, along with bio-methane integration. These measures would significantly improve Ireland's security of supply position.
- It is submitted that the proposed FSRUP should be considered a key project that would enable Ireland to ensure energy security of supply by providing an alternative source of gas, through the use of existing infrastructure. In support of this it should be noted that diversification of supply sources is considered paramount both to energy security as well as for competitiveness. Ensuring that all Member States have access to liquid gas markets is a key objective of the EU's Energy Union.
- The Department of the Environment, Climate Actions and Communications has commissioned a study on the security of Energy Supply of Ireland's Electricity and Natural Gas Systems. This newly commissioned study is expected to be published in Q2 2022 and will include extensive stakeholder consultation and the preparation of a technical analysis to inform a full strategic review.

It is hoped that the Mag Mell FRSU will be included in the consultation process of this review during 2021. In this regard, and with respect to the above points it is submitted that the proposed KEL Consent Application No. 3 should acknowledge the Mag Mell FSRUP Project that would make use of the existing 24" pipeline and associated AGI connected to the GNI entry point at the onshore Inch Terminal.

- Mag Mell Energy Ireland Ltd contends that the 24" export pipeline could be left in a state of interim decommissioning (i.e. as is, filled with inhibited seawater) until such time as access to the pipeline and Inch Onshore Terminal is established by the MAG Mell LNG FSRU project. Mag Mell Energy Ireland Ltd further contends that the filling of the onshore section of 24" export pipeline with grout and the decommissioning of the associated Inch Onshore Terminal is premature and a decision to grant consent by DECC can be deferred without adversely affecting the overall decommissioning cost or schedule.

General comments on climate, energy storage and environmental impacts

UK Government guidance on decommissioning pipelines is outlined in Offshore Oil and Gas Decommissioning Guidance Notes November 2018, published by the Department for Business, Energy and Industrial Strategy. These Guidance Notes include the following provisions:

- Sections 5.18 to 5.23 recognise that decommissioning can be deferred stating that “disused facilities including pipelines may represent important UKCS infrastructure and provide the means for the further development of hydrocarbon reserves, or the storage of carbon dioxide or hydrocarbon gas. Where a specific opportunity has been identified deferral of decommissioning can be considered”.
- Sections 10.23 to 10.27 address the situation where a pipeline reaches the end of its operational life substantially in advance of the other facilities in the field. In this case decommissioning of the pipeline is deferred, and the pipeline is considered to form part of an “Interim Pipeline Regime”.

Mag Mell Energy Ltd understands that decommissioning of the Kinsale Field is taking place because of the cessation of production, but the 24” gas export pipeline has not necessarily reached the end of its operational life. Industry best practice makes provision for the deferral of decommissioning if reuse is an option, and furthermore the concept of “interim decommissioning” is acknowledged and allowed for in international decommissioning guidance documents.

KEL advise in their Consent Application that these activities will be completed from onshore and do not require any specialised offshore vessels or equipment. These activities therefore could be deferred to some later date, and at no apparent additional cost. It should be noted that KEL indicate in their submission that other decommissioning activities may be deferred to 2023 (e.g. jacket removal).

- DECC has commissioned a study into the security of energy supply to the island of Ireland, and this study has not yet been completed. The contract for this work was awarded in May 2021 (OJS contract award notice 2021/S 093-244025), and the expected timeframe for the report was 12 months (Reference: DECC Request for Tender RFT100519 for the provision of Consultancy Services to undertake a Technical Analysis to inform a Review of the Security of Energy Supply or Ireland’s Electricity and Natural Gas System). It is assumed that LNG projects such as Mag Mell will be considered an integral part of this study. Mag Mell therefore contend that the above listed decommissioning activities should not be carried out until such time as this study is completed and the importance of LNG projects to the security of supply to the country, is established and understood.
- Further to the security of supply issue as outlined, EirGrid the national TSO, have advised that energy shortages are likely in the winter of 21/22 leading to black outs. Further electricity outages are considered likely in the coming years. This highlights the need to keep gas storage options open and adds further weight to the deferral of the 24” gas export pipeline decommissioning.
- Ireland is entering a period of major transition of its energy systems as part of the national Climate Action Plan 2019 objective to double electricity generated from renewable sources to 70% of the nation’s consumption with the majority of the remaining 30% of electricity generated from natural gas. Maintenance of energy security for Ireland within this transition period depends on the provision of a strategic natural gas storage facility such as Ram Head to provide security of supply for the national network.

General comments on climate, energy storage and environmental impacts

- The PSE KEL Consent letter states that following discussions with DECC regarding potential future use of the facilities, it was the position of the Department that Consent Application No. 3 should be submitted on the basis that arrangements are not to be made to provide for the future use of the pipelines. Did the Department take into account the ongoing discussions with Predator Oil and Gas Holdings Plc on the Ram Head Licence Option 16/30 Extension in reaching this position?

KEL's Consent Application 2 of August 2019 states that a leave *in situ* option, particularly in regard to the main 24" export pipeline and landfall, could facilitate the re-use of the pipeline infrastructure in the future.

Preliminary studies into the use of the Kinsale Head reservoir and facilities for CCS have been undertaken by Ervia and these indicate that re-use of the platform jackets as part of a CCS project is not viable, although the 24" export pipeline could possibly be re-used.

In his report to DECC on 28th November 2019 on KEL's Consent Application No. 2 Stephen Jewell of Selgovia Limited (retained by DECC as petroleum engineering advisor) stated that KEL remains open to the possibility that some of the pipelines might be preserved for reuse pending more detailed study of such options. Has a more detailed study of those options been carried out by KEL?

- It should be noted that the 'Long Term Resilience Study' concluded that the development of permanent gas storage is one of the options to improve Ireland's security of supply position.
- It is submitted that the proposed Ram Head Gas Storage Project should be considered a key project, as it would enable Ireland to ensure energy security of supply by providing an alternative source of gas, through the use of existing infrastructure. In support of this it should be noted that the use of existing infrastructure. In support of this it should be noted that diversification of supply sources is considered paramount both for energy security as well as for competitiveness.
- Natural gas storage as proposed by the RAM Head Gas Storage Project is well established as an issue of 'public interest'. By virtue of targets and actions set within the Government's Climate Action Plan Ireland is entering a period of major transition of its energy systems, including increasing the proportion of the electricity generated from renewable sources to 80% of the country's final consumption. This target was set in the Climate Action Plan in October 2021, with the majority of the remaining 20% of electricity anticipated to be generated from natural gas. The maintenance of energy security with this transition period is critical to the Plan's success, and the provision of natural gas storage is acknowledged as having the potential to make a major contribution to our energy security.
- In terms of wider energy security considerations, the following factors are important:
 - Ireland's demand for electricity is expected to increase in the coming years due to increased electrification in the heat and transport sectors and growth in demand from large energy users such as data centres.
 - Following the phasing out of peat and coal use for electricity generation, Ireland's security of electricity supply is expected to become much more dependent on natural gas which is likely to be the principal source of non-variable generation supporting variable renewable sources such as wind and solar.

General comments on climate, energy storage and environmental impacts

- There will be a significant reduction in indigenous supplies of natural gas due to production at Kinsale fields having ceased in July 2020, and the planned tapering decline in production from Corrib over the next decade.
- Ireland’s gas import dependency is predicted to increase from over 50% in 2019 to circa 80% by the middle of the decade and to over 90% import dependency by 2030.
- All of Ireland’s natural gas imports are sourced (via the two pipelines) from a single supply point at Moffat in Scotland with no alternative import routes.
- There is no natural gas storage in Ireland at present.
- The UK has left the European Union which will lead, at the end of the withdrawal period, to difficulties for Ireland in meeting the requirements of EU law in relation to gas security of supply including potential challenges for future compliance with EU law including the “N-1” infrastructure standard and supply standard.
- In July 2018, the Irish Academy of Engineering published a report on the role of natural gas in Ireland’s energy security. The report highlighted the following key conclusions:
 1. Natural Gas is critical to Ireland’s Energy Supply
Gas plays a critical role in Ireland’s energy mix. Gas supplies around 30% of Ireland’s total primary energy and is used to generate about 50% of Ireland’s electricity. Many indigenous and multinational companies in Ireland rely on gas. Approximately 650,000 households in Ireland depend on natural gas for home heating.
 2. Natural gas will be essential for Ireland’s transition to a low-carbon future
Electricity generation in Ireland in the future will be a combination of renewables and natural gas. Ireland’s dependence on natural gas for electricity generation will increase further when coal and peat use in generation end. Gas would then account for over 90% of Ireland’s electricity generation at times of very low renewables generation. Natural gas has the lowest carbon emissions of all fossil fuels and is the ideal complement to renewables. Gas will also be needed for many industries in Ireland where there is no low-carbon alternative. Gas will be critical for Ireland’s transition to a low-carbon future.
 3. Ireland will have no indigenous gas supply after 2030
Corrib will only supply around 20% of Ireland’s annual gas demand in 2025. Corrib production will cease around 2030. This will leave Ireland in the vulnerable position of having no indigenous gas supply and being totally dependent on gas imports from Britain.
 4. Ireland needs to develop alternative gas sources
Ireland needs to develop diverse sources and routes of gas supply to ensure its energy security in the longer term. By 2030, Britain will need to import 75% of its gas due to the decline in North Sea production. The gas supply route to Ireland will be longer than at present with a greater risk of supply disruption. Ireland should have at least two separate supply sources and supply routes. Developing a gas storage project at Ram Head would enhance Ireland’s security of supply and provide access to the competitive global gas market. Exploration for offshore gas should be promoted in parallel. Options of gas storage in Ireland also need to be assessed.

General comments on climate, energy storage and environmental impacts

5. A Strategic plan for gas supply security is needed.

A strategic government plan is needed to diversify Ireland’s gas supply. This strategic plan should include appropriate fiscal, licensing and legislative frameworks to facilitate the development of new sources of gas supply and encourage investment. The plan needs to factor in a lead-time of five to ten years for large energy infrastructure developments in Ireland.

- It should be noted that there have been a number of important developments since both of these studies were published. These include:
 - A new target of 70% for the level of electricity generated from renewable sources by 2030 has been set.
 - Clarity that the UK will leave the internal energy market and the full spectrum of EU energy law will no longer apply to the UK.
 - The planned closure of two of the three peat-fired power stations and the significant reduction in generation of electricity from coal increasing the reliance on electricity supply in Ireland on natural gas in the near term.
 - A reduction in the number of active petroleum exploration licences and the commitment in the Programme for Government to end the issuing of new licences for exploration and extraction of gas, which in turn means a significant reduction in the likelihood of additional indigenous production of natural gas.
- In light of the above, it is considered that these previous studies are no longer considered fully representative of the key risks to security of supply in natural gas and electricity systems. In response, the DECC has therefore commissioned a further study on the Security of Energy Supply of Ireland’s Electricity and Natural Gas Systems. This newly commissioned study is expected to be published in Q2 2022 and will include extensive stakeholder consultation and the preparation of technical analysis to inform a full strategic review.

It is hoped that the Ram Head Gas Storage Project will be included in the consultation process of the review during 2021.

- It is crucial that Ireland does not further lock-in its dependence on fossil fuels if we are to meet our climate targets under the Paris Agreement and the Climate Action and Low Carbon Development (Amendment) Bill 2021 - which legally obliges us to achieve a 51% reduction of our 2018 emissions levels by 2030 and net-zero by no later than 2050.
- Global and national climate targets mean that LNG terminals and other large fossil fuel infrastructure projects are at a high risk of becoming stranded assets, which must be retired well before the end of their useful life.
- Any investment in new fossil fuel infrastructure, or providing a market for such infrastructure, will displace investment in clean energy. It is also directly contrary to market signals; renewable energy portfolios consistently outperform fossil fuel investments, with a new study showing that renewable power 4 portfolios generate triple the returns of fossil fuel portfolios and have proven more resilient to the pandemic.

APPENDIX C: PROJECT SPECIFIC CONSULTATION RESPONSES (POLICY ISSUES)

Consultee	Project Specific Comments	Response
<p>Simply Blue Energy Ltd</p>	<p>We note the application for consent to decommission the Kinsale gas export pipeline and would like to make a proposal that the pipeline is not decommissioned as planned but rather kept in a preservation state for further use. Specifically, we would suggest that the landfall is not grouted, and the presentation state is left full of inhibited seawater or some other preservation medium. There are potential reuse options that have not been fully assessed yet.</p> <p>Section 3.3 of the consent application notes that the <i>Kinsale Area facilities (including pipelines and umbilicals) were designed for dry gas production and processing, and the majority of the facilities are now close to or beyond their original design lives. Nevertheless, parts of the facilities may have been suitable for re-use, depending on the service, particularly the main Kinsale and Seven Heads export pipelines. Three potential re-uses have been considered at a high level. These are hydrocarbon production, carbon capture and storage (CCS) and offshore wind energy production. An assessment of the alternatives and other uses are outlined in full at Sections 3.3 and 3.4 of the EIAR. Following discussions with DECC regarding potential future use of the pipelines, it was the position of the Department that Consent Application 3 should be submitted on the basis that arrangements are not to be made to provide for the future use of the pipelines. Kinsale Energy is proceeding with decommissioning on the basis that none of the pipelines or umbilicals will be re-used.</i></p> <p>Section 3.3 of the EIAR considers hydrocarbon production, CCS and wind energy production. Specifically on wind energy production: <i>Offshore Wind Energy Production - The main 24" export pipeline and landfall could possibly have a use as a cable conduit, for either fibre optic or high-voltage direct current (HVDC) cables (for example as part of a windfarm). The platform jackets could be used to support HV convertor stations. Kinsale Energy is not aware of any wind farm development being considered for the vicinity of any of the Kinsale Area facilities, so no proposal currently exists at this time.</i></p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by the Environmental Assessment Unit (EAU)</p>

Consultee	Project Specific Comments	Response
	<p>We consider that the future wind energy options have not been fully considered as using the pipeline as a conduit for HV cables could be feasible for selected sections such as the landfall area to avoid further beach trenching. This requires further assessment and is not covered directly in the current EIAR. We do have a project in development in potentially close proximity to the Kinsale Area facilities. In addition, there may be the potential to reuse the pipeline for hydrogen transportation as either part of an offshore hydrogen reservoir storage facility or as a buffer storage in itself.</p> <p>We believe these options should be considered fully before any permanent state of decommissioning is enacted.</p>	
<p>dCarbonX Ireland Ltd</p>	<p>dCarbonX believes a full assessment of the potential reuse of the Kinsale Area gas field pipeline infrastructure for future energy storage capacity development, considering our present and future national energy context, should be carried out before choices become further limited by ongoing abandonment activities.</p> <p>The storage of hydrogen / hydrogen carriers was not considered as a potential reuse option by the Operator during its assessment.</p> <p>The availability of suitable pipelines and plant could vastly reduce both cycle times and costs for any future energy storage project in the area which would be positive in terms of Ireland’s security of supply.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd</p>	<p>In the KEL EIAR Vol 1 of May 2018 under Consideration of Potential Alternative Uses, the use of the main 24” export pipeline and the landfall at the Inch Terminal as import infrastructure for floating LNG was not considered. In the KEL EIAR Addendum 1 of 8th August 2019 Consultation Table Predator Oil and Gas and Mag Mell were not included. Therefore, we submit that:</p> <p>The Mag Mell FSRU Project provides a viable alternative to the re-use option for the 24” pipeline and Inch Terminal.</p> <p>Mag Mell Energy Ireland objects to the proposed plan under KEL’s Consent Application 3 to fill the onshore section of the 24” export pipeline with grout.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>

Consultee	Project Specific Comments	Response
	<p>Mag Mell Energy Ltd objects to the proposed plan under KEL’s Consent Application 3 to decommission the Inch Terminal.</p> <p>The objections are lodged now due to the fact that Mag Mell Energy Ireland Ltd was overlooked in the KEL and DECC stakeholder engagement process despite verifiable correspondence between the Predator Group, including Predator Oil and Gas Ventures Ltd. and Predator LNG Ireland Ltd (now Mag Mell Energy Ireland Ltd).</p>	
<p>SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd</p>	<p>Neither Predator Oil and Gas or Mag Mell Energy Ireland Ltd are included in KEL’s stakeholder register referenced in KEL’s Consent Application 3 of 30th September 2021 although Paul Griffiths has been in contact with DECC, ERVIA and GNI, CRU and KEL concerning the use of the 24” export pipeline and Inch Onshore Terminal by the Mag Mell FSRU Project.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd</p>	<p>In his report to DECC on 28th November 2019 on KEL’s Consent Application No. 2 Stephen Jewell of Selgovia Limited (retained by DECC as petroleum engineering advisor) stated that KEL remains open to the possibility that some of the pipelines might be preserved for reuse pending more detailed study of such options. Has a more detailed study of those options been carried out by KEL?</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd</p>	<p>It is proposed that KEL Consent Application No. 3 should acknowledge the potential alternative use of the existing 24” pipeline and the onshore Inch Terminal by the Mag Mell LNG FSRU Project and modify the decommissioning plan accordingly.</p> <p>We request that the following should be inserted in the second paragraph of Section 3.3 of the KEL Consent Application 3: <i>“Five potential re-uses have been considered at a high level. These are hydrocarbon production, carbon capture and storage (CCS), Floating LNG Storage and Regasification, offshore gas storage and offshore wind energy production”.</i></p> <p>Section 3.3 of the EIAR should include a paragraph on Floating LNG Storage and Regasification.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>

Consultee	Project Specific Comments	Response
	<p>KEL EIAR Addendum No. 2 of 30th September 2021 should acknowledge that an alternative re-use and operator has been identified for the existing 24" pipeline and the onshore Inch Terminal by the Mag Mell LNG FSRU Project.</p> <p>The failure by KEL and DECC to recognise Predator Oil and Gas Ventures Ltd. and Predator LNG Ireland Ltd (now Mag Mell Energy Ireland Ltd) as stakeholders in the decommissioning consultation process potentially represents, in legal terms, an attempt at constructive termination of parts of their long-established business in Ireland. In the interests of absolute transparency, please indicate why Predator Oil and Gas Ventures Ltd and Predator LNG Ireland Ltd (now Mag Mell Energy Ireland Ltd) were not identified as stakeholders during the decommissioning consultation process and why the LNG FSRU option for the use of the Kinsale pipeline was not considered. Predator regards this as a very grave matter deserving your full attention as no legislation existed at the time of the decommissioning submissions that prevented re-use of the Kinsale facilities. Indeed, quite the opposite, the 2007 Offshore Licensing Terms and Conditions, which are still in force, specifically provide circumstances where the facilities could be used by third parties.</p>	
<p>SLR Consulting Ireland on behalf of Predator Oil and Gas Holdings Plc</p>	<p>In the KEL EIAR Vol 1 of May 2018 under Consideration of Potential Alternative Uses the use of the main 24" export pipeline and landfall at the Inch Terminal as import infrastructure for offshore gas storage was not considered. In the KEL EIAR Addendum 1 of 8th August 2019 Consultation Table Predator Oil and Gas Holdings Plc was not included. Therefore, we submit that:</p> <p>The Ram Head Gas Storage Project provides a viable alternative re-use option for the 24" export pipeline and the Inch Terminal.</p> <p>Predator Oil and Gas Holdings Plc objects to the proposed plan under KEL's Consent Application 3 to fill the onshore section of the 24" export pipeline with grout. The intention is to ground the onshore pipeline section during decommissioning of the Inch Onshore Terminal site.</p> <p>Predator Oil and Gas Holdings Plc objects to the proposed plan under KEL's Consent</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>

Consultee	Project Specific Comments	Response
	<p>Application 3 to decommission the Inch Terminal.</p> <p>Predator Oil and Gas Holdings Plc contends that the 24" export pipeline could be left in a state of interim decommissioning (i.e. as is, filled with inhibited seawater) until such time as access to the pipeline and Inch Onshore Terminal is established by the Ram Head Gas Storage Project. Predator Oil and Gas Holdings Plc further contends that the filling of the onshore section of the 24" export pipeline with grout and decommissioning of the associated Inch Onshore Terminal is premature and a decision to grant consent by DECC can be deferred without adversely affecting the overall decommissioning cost or schedule.</p> <p>These objections are lodged now due to the fact that Predator Oil and Gas Holdings Plc was overlooked in the KEL stakeholder engagement process.</p>	
<p>SLR Consulting Ireland on behalf of Predator Oil and Gas Holdings Plc</p>	<p>Predator Oil and Gas Holdings Plc is not included in KEL's stakeholder register referenced in KEL's Consent Application 3 of 30th September 2021 although Paul Griffiths has been in contact with DECC, concerning the extension of the Licence Option 16/30 for the Ram Head Gas discovery.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>SLR Consulting Ireland on behalf of Predator Oil and Gas Holdings Plc</p>	<p>It is submitted that the proposed KEL Consent Application No. 3 should acknowledge the Ram Head Gas Storage Project that would make use of the existing 24" pipeline and associated AGI connected to the GNI entry point at the onshore Inch Terminal.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>

Consultee	Project Specific Comments	Response
<p>SLR Consulting Ireland on behalf of Predator Oil and Gas Holdings Plc</p>	<p>We request that the following be inserted in the second paragraph of Section 3.3 of the KEL Consent Application 3:</p> <p>“Five potential re-uses have been considered at a high level. These are hydrocarbon production, carbon capture and storage (CCS), Floating LNG Storage and Regasification, offshore gas storage and offshore wind energy production”.</p> <p>Section 3.3 of the EIAR should include a reference to the Ram Head Gas Storage Project.</p> <p>KEL EIA Addendum No. 2 of 30th September 2021 should acknowledge that an alternative re-use and operator has been identified for the existing 24” pipeline and onshore Inch Terminal by the Ram Head Gas Storage Project.</p> <p>The failure by KEL and DECC to recognise Predator Oil and Gas Holdings Plc. as a stakeholder in the decommissioning consultation process potentially represents, in legal terms, an attempt at constructive termination of parts of its long-established business in Ireland. In the interests of absolute transparency, please indicate why Predator Oil and Gas Holdings Plc. was not identified as a stakeholder during the decommissioning consultation process and why the Ram Head Gas Storage option for the use of the Kinsale pipeline was not considered. Predator regards this as a very grave matter deserving your full attention as no legislation existed at the time of the decommissioning submissions that prevented re-use of the Kinsale facilities. Indeed, quite the opposite, the 2007 Offshore Licensing Terms and Conditions, which are still in force, specifically provide circumstances where the facilities could be used by third parties.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>Not Here Not Anywhere</p>	<p>NHNA welcomes the decommissioning of certain facilities within Kinsale Area gas fields however we argue that the Kinsale Head Consent Application No. 3 — which requests consent to leave <i>in situ</i> the 24” export pipeline and all infield pipelines — along with the Seven Heads gas field application, will allow for the decommissioned pipelines to be used for future fossil fuel projects. Leaving this fossil fuel infrastructure <i>in situ</i> risks creating a “lock in” effect, guaranteeing high</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>

Consultee	Project Specific Comments	Response
	<p>levels of gas consumption, obstructing investment in clean energy, and delaying the zero carbon energy transition.</p>	
<p>Not Here Not Anywhere</p>	<p>We urge the Department of Environment, Climate and Communications to ensure that:</p> <ul style="list-style-type: none"> • The Inch onshore terminal is decommissioned, with full removal and reinstatement to agricultural use as set out in the application. • The onshore section of the 24" export pipeline is filled with grout as set out in the application. • Any infrastructure left <i>in situ</i> is not used for future fossil fuel projects. For example, legislation such as the LNG Free Bill can be put in place to prevent the development of Liquefied Natural Gas terminals. 	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>Not Here Not Anywhere</p>	<p>We argue that the comparative assessment approach has failed to take into account future impacts on the climate and the environment — in particular those in relation to carbon dioxide and methane emissions — if this infrastructure is once again used for fossil fuels.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>Not Here Not Anywhere</p>	<p>Kinsale Energy’s own Environmental Impact Assessment Report suggests that the facilities being decommissioned could be potentially re-used for hydrocarbon production. As documented in a submission to the initial consultation on the proposed decommissioning, fossil fuel company Predator Oil and Gas Holdings Ltd are planning to build a LNG terminal located off the coast of Cork and intend to use the Inch onshore terminal and the connected offshore pipeline (the 24" export pipeline that is to be left <i>in situ</i>) as an entry point to Gas Networks Ireland. This is a prime example of how leaving this fossil fuel infrastructure <i>in situ</i> risks locking Ireland into dirty energy and threatens our climate commitments.</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>
<p>Not Here Not Anywhere</p>	<p>The Kinsale gas infrastructure is the energy infrastructure of the past, and in the context of Irish legislation and policy and the urgent decarbonization required to keep 1.5C alive, its decommissioning is wholly appropriate. We urge the Department to ensure that any infrastructure left <i>in situ</i> is not used for future fossil fuel</p>	<p>As this is a policy issue it is not relevant to the AA screening assessment by EAU</p>

Consultee	Project Specific Comments	Response
	projects and to pass legislation to ensure this is not the case.	