

## Reasoned Conclusion on submitted EIAR

The submitted EIAR is concluded to be comprehensive and has been compiled by suitably qualified individuals. It is concluded that the submitted information is sufficient to arrive at a reasoned conclusion with respect considering the likely significant effects on the environment arising from this development.

Having considered the IEC's report, the submitted EIAR and having regard to the totality of the documentation on file it is concluded that the main non-significant direct and indirect effects of the proposed development on the environment are:

- No residual significant direct or indirect impacts on Population and human health are predicted.
- The proposed development will have a beneficial impact on Air Quality by supporting renewable power generation and reducing the requirement for generation of power by fossil fuels sources, the emissions to air from fossil fuel generation will be reduced.
- It is anticipated that the proposed development will have a net positive effect on Climate by reducing GHG emissions as it will support renewable power generation and reducing the requirement for generation of power by fossil fuels sources.
- No residual significant direct or indirect impacts on Land and soil are predicted.
- There will be no residual risk of flooding of the Celtic Interconnector landfall areas and the project is not expected to have any impact on the risk of flooding of surrounding areas.
- With the implementation of the proposed mitigation measures, no residual significant direct or indirect impacts on water quality are predicted.
- There will be a temporary slight adverse but not significant impact on benthic biodiversity and resident fish communities due to habitat loss. There will be a temporary adverse impact from cable installation on benthos, but no residual impacts are expected as a rapid recovery to pre cablelay levels for faunal biomass and diversity is expected. The residual impacts on benthic biodiversity associated with the cable lay activities will be not significant permanent adverse.
- No long-term impacts on fish distribution or abundance are predicted, thus the likelihood of significant indirect impacts on prey abundance and distribution for marine mammals is low.
- No significant residual direct or indirect impacts on marine mammals are predicted with the effective implementation of mitigation measures proposed
- There will be no residual significant direct impacts on non-breeding waterbirds or their habitats.
- With the implementation of the proposed mitigation measures, no residual significant direct or indirect impacts are predicted on any designated site because of the construction and operation of the Celtic Interconnector Project.
- The impact of the Celtic Interconnector Project on Natura 2000 Sites was assessed separately as outlined above.
- Neither the construction nor the operation of the Celtic Interconnector Project will have a significant direct or indirect impact on the landscape or seascape or on visual amenity.
- In relation to archaeology and cultural heritage, the Celtic Interconnector Project will have a slight adverse residual effect on near-shore peat deposits and offshore deposits of geoarchaeological interest. There is also the potential to uncover and expose previously unrecorded archaeological material, most notably shipwrecks.
- In relation to existing material assets, existing cables have a high sensitivity due to damage and economic implications. With the mitigation measures proposed, there will be a slight adverse residual impact to existing cables. The proposed development will have a positive transboundary

impact on material assets associated with providing a high capacity electricity transmission line between Ireland and France.

- The construction and the operation of the Celtic Interconnector Project will have no significant noise or vibration impacts on the nearest sensitive terrestrial receptors on land at the landfall.
- Cable installation and the shipping associated with the Celtic Interconnector Project, are not expected to have a significant adverse effect on the underwater noise environment or on noise sensitive marine species.
- There is a potential temporary adverse impact to shipping and navigation due to the presence of work vessels with limited ability to manoeuvre during the installation phase. Though not anticipated for the majority of the cable route within the Irish Foreshore, additional cable protection may be required which will result in localised reduction in water depth. Additionally, the Commissioner of Irish Lights indicated the presence of a marine aid to navigation (bar rocks buoy) and requested consultation prior to construction.
- Mitigation measures and cable route design have minimised the impacts to shipping and navigation and no significant residual impacts are identified.
- A permanent, localised displacement of commercial fisheries activities due to seabed obstructions resulting from cable protection measures may occur within the Irish Foreshore. There will also be temporary displacement to fishing activity from installation and maintenance work as a result of temporary exclusion zones. The magnitude of this effect has been assessed as imperceptible or Minor and Not significant.
- The Celtic Interconnector Project does not pose an increased risk of significant adverse effects on the environment due to its vulnerability to risks of major accidents and/or disasters.

It is noted that a draft Construction Environmental Management Plan (CEMP) (EirGrid, June 2021) was submitted with the application. The draft CEMP sets out the minimum requirements which will be adhered to during the construction phase of the Celtic Interconnector Project. The draft CEMP includes all the construction phase mitigation measures proposed in the EIAR and stipulates revisions to include construction-related conditions attached to granting the Foreshore Licence. The draft CEMP sets out the minimum requirements which will be adhered to during the construction phase of the Celtic Interconnector Project. It is proposed that the draft CEMP will be updated as the project progresses. This document is considered to be both reasonable and prudent in view of the scale, complexity and importance of the project. The report and assessment of the IEC has been considered in conjunction with a review of the submitted documentation and it is considered that the submitted information is comprehensive.

It is concluded that following consideration of the submitted reports including the assessment report on the EIAR undertaken by our IEC, the EIAR complies with the EIA Directive and the relevant Irish legislation. The impacts of the Celtic Interconnector are concluded to be acceptable in terms of population and human health, biodiversity, land, soil, water, air and climate, material assets, cultural heritage and landscape. Below are the environmental conditions which are included in the holistic MLVC report

1. The Licensee shall use that part of the foreshore, the subject matter of this licence, for the purposes as outlined in the application and for no other purposes whatsoever.
2. The following drawings shall be attached to and referenced in the licence document;
  - a. Foreshore Licence Map 1, Drawing Number: 400584-PL-DWG-009 Rev: D. Date: 10/06/21,
  - b. Foreshore Licence Map 2, Drawing Number: 400584-PL-DWG-009 Rev: D. Date: 10/06/21.
3. Underwater Archaeology:

The following mitigation measures for underwater archaeology shall be implemented in full:

  - a. An Underwater Archaeological Impact Assessment (UAIA) shall be undertaken to address any potential impact to the Underwater Cultural Heritage. A licence-eligible, suitably qualified, underwater archaeologist shall be engaged to carry out the Underwater Archaeological Impact Assessment (UAIA). The archaeologist shall also be suitably experienced, with a track record in dealing with marine and offshore developments, resultant report submission, etc.
  - b. This evaluation shall be conducted by a multidisciplinary team of specialists to determine the archaeological, including artefact-bearing, potential of the submerged forest deposits and the nature, date and extent of any such archaeological materials that may exist.
  - c. The evaluation shall include detailed topographical mapping of the peat horizon, a systematic wade and dive survey and careful manual excavation and paleo environmental sampling of a substantial section of the deposit (to be agreed with the Department of Housing, Local Government and Heritage via a method statement), aimed at retrieving and plotting the locations of worked stone tools and other archaeological materials, should they be identified.
  - d. The UAIA shall include a hand-held metal detection survey, undertaken by a suitably licenced and experienced detectorist. A Dive Licence (section 3 1987 Act) and Detection Device consent (section 2 1987 Act) will be required for these works.
  - e. A detailed method statement shall accompany their licence applications to the National Monuments Service for consideration (both for a Dive Survey Licence to cover the UAIA and a Detection Device Consent to cover the geophysical survey assessment for archaeological purposes and metal detector for the foreshore survey). The licences shall be issued as required under the National Monuments Acts 1930-2004.
  - f. The archaeologist shall be compliant with all licensing requirements, including being up to date with report submissions.

g. A preliminary report shall be issued to the Department within four weeks of the end of the excavation works and this report shall summarise the results. The UAIA Report is to contain a detailed Impact Assessment to address all identified cultural heritage and shall also make recommendations for mitigation measures to avoid all impacts to the archaeology. If potential or identified sites, features or artefacts cannot be avoided to allow for preservation in situ, then the UAIA Report Recommendations shall put forward an archaeological mitigation strategy to address this, including preservation by record (archaeological testing and/or full archaeological excavation).

h. Once all surveys and follow up interpretations (including radiocarbon dating and palaeoenvironmental analysis) have been completed, the full information is to be compiled into a UAIA report and submitted to the Underwater Archaeology Unit, National Monuments Service for review and further comment. The Licensee shall be prepared to be advised by the Department of Housing, Local Government and Heritage in this regard.

i. For wrecks and other sites identified, or the potential location of same, the results to be reviewed by the Licensee and the archaeologists and appropriate exclusions placed around them to ensure they are avoided by any works, including SI works.

j. Once the UAU or the National Monuments Service has had the opportunity to review the UAIA Report, further recommendations may arise. It should be borne in mind that should significant archaeological remains be identified, further archaeological mitigation / monitoring may be required. The Department of Housing, Local Government and Heritage will advise the Licensee with regard to these matters.

4. There are two options detailed in the EIAR for burying the cables/trench. The Licensee shall inform in writing prior the commencement of development The Department of Housing, Local Government and Heritage and the local Inland Fisheries Ireland office (Macroom) of the chosen option for cable burial.

5. A Fisheries Liaison Officer (FLO) shall be appointed to ensure timely engagement with the fishing community whose activities have the potential to be affected by the proposed development throughout construction and installation.

6. The Licensee shall liaise with the national representative organisations and their members who operate in the area as the project continues to progress. The Licensee shall also liaise with the local fishing producer organisations including but not limited to the Irish South & East Fish Producers Organisation, National Inshore Fisheries Forum, the local Regional Inshore Fisheries Forums and Irish South & West Fish Producers Organisation.

7. The Licensee shall develop a Fisheries Management and Mitigation Strategy (FMMS) which shall be discussed and agreed with the relevant stakeholders including relevant members of the National Inshore Fishermen's Association (NIFA) and the National Inshore Fishermen's Organisation (NIFO) prior to the commencement of the works .

8. The Licensee shall notify the local Inland Fisheries Ireland office (macroom@fisheriesireland.ie) five days in advance of works commencing on the site.
9. An appropriate Marine Notice detailing the works and vessels engaged in said works shall be prepared and published for the information of all marine users in the sea area covered by the application. Safety notices for mariners shall be promulgated by all available means appropriate during the duration of the subsea cable operations to ensure the safety of navigation is maintained.
10. The Licensee shall complete cable installation and maintenance in accordance with the application and supporting documents provided in the application process.
11. The mitigation measures as outlined within Section 3.6 of Volume 6B of the application documentation (Appropriate Assessment Screening Report and Natura Impact Statement, March 2022) shall be implemented in full.
12. The mitigation measures listed in EIAR Volume 3D2 Appendix 5A Construction Environmental Management Plan and in the technical chapters of the EIAR Volume 3D2 shall be implemented in full.
13. An up-to-date Construction Environmental Management Plan (CEMP) shall be submitted by the Licensee to the Department of Housing, Local Government and Heritage, for the approval of the Minister (subject to such modifications, if any, as she/he may deem appropriate) at least two months before work commences on site. The CEMP shall provide detailed construction methodology and shall further consider all potential and predicted impacts, the mitigation and control measures and their implementation and the monitoring proposed.
14. The CEMP shall include an Accident Prevention Procedure that addresses hazards, particularly in relation to the prevention of accidents with a possible impact on the environment.
15. The CEMP shall include an Emergency Response Plan which sets out the procedure to be followed in the event of an accident/emergency relating to impacts on the environment.
  - a. The Licensee shall include the Marine Institute, Sea Fisheries Protection Authority, Inland Fisheries Ireland and Bord Iascaigh Mhara in the emergency response plan as notifiable bodies in the event of water pollution occurring during the works.
  - b. The Licensee shall notify the relevant authorities as soon as practicable after the occurrence of any emergency or pollution incident. The Licensee shall include as part of the notification, the date and time of the incident, summary details of the occurrence, and where available, the steps taken to minimise any impacts.
  - c. In the case of any incident relating to archaeology, marine mammals or migratory fish, the Licensee shall notify the National Monuments Service, National Parks and Wildlife Service, Marine Institute, Sea Fisheries Protection Authority, and Bord Iascaigh Mhara and Inland Fisheries Ireland and any other relevant authorities as soon as practicable after such an



incident.

16. The licensee shall make a record of any incident. This record shall include details of the nature, extent, and impact of, and circumstances giving rise to, the incident. The record shall include all corrective actions taken to manage the incident, and the effect on the marine environment, and avoid recurrence. The licensee shall, as soon as practicable following incident notification, submit to the relevant authorities the incident record.
17. The mitigation measures for onshore noise at the landfall listed in Section 7.10.4 of this report shall be implemented in full.
18. The licensee shall notify the Department of Housing, Local Government and Heritage at least 14 days in advance of the commencement of any works on the foreshore. This notification shall include an up to date Programme of Works for the completion of the project.
19. The Licensee shall provide signage for recreational anglers along Claycastle beach in advance of commencement of the works. The signage shall provide a brief description of the works, the timing of the works, a description of exclusion zones and limits to access and shall provide the contact number of a project liaison person.
20. During the course of the nearshore/landfall cable lay operations the Licensee shall ensure that existing public access arrangements are maintained, where possible, and all necessary precautions are put in place to protect the public in accordance with relevant Health and Safety Legislation.
21. The Licensee shall ensure that all contractors, and their subcontractors, are made aware of all conditions and project specific requirements and they are required to brief all relevant staff on these to ensure that all parties are fully aware of these requirements.
22. The Licensee shall consult with Commissioners of Irish Lights during the installation phase of the project to avoid any impact to safety of navigation.
23. The Licensee shall adhere to the IFI Guidelines during construction works where applicable.
24. The Licensee shall restore the foreshore and adjacent seashore beach area to its natural condition on completion of the cable installation works to the satisfaction of the Department of Housing, Local Government and Heritage.
25. On completion of the works, the Licensee shall submit to the Department of Housing, Local Government and Heritage a statement from a suitable qualified Chartered Engineer confirming that works are completed in accordance with the documents submitted together with a drawing and a route position list showing the "as-laid location" for the submarine cable.
26. The Licensee shall ensure the information regarding the final location, depth and shore markings of submarine cables is submitted to the United Kingdom Hydrographic Office (UKHO) for inclusion on relevant navigation charts.
27. Decommissioning procedure shall be in accordance with best practise at that time. This could involve leaving in situ, mitigation works, partial removal and full removal or otherwise agreed with the lessor and the relevant competent authorities at that time in compliance with all relevant legislation and environmental requirements.

Signature & Date of Recommending Officer:

A large black rectangular box redacting the signature of the recommending officer.

 Senior Planning Adviser BA (Hons), MsC, MBA, MIPI

13th May 2022