

Intended for

**Environment Advisory Unit**

**Department of the Environment, Climate and Communications**

Date

**January 2023**

Project Number

**1620009502**

# **STATUTORY ENVIRONMENTAL ASSESSMENT APPROPRIATE ASSESSMENT SCREENING REVIEW FOR END OF OPERATIONS SEABED SURVEY OF THE KINSALE AREA INSTALLATIONS**

# STATUTORY ENVIRONMENTAL ASSESSMENT APPROPRIATE ASSESSMENT SCREENING REVIEW FOR END OF OPERATIONS SEABED SURVEY OF THE KINSALE AREA INSTALLATIONS

Project No. **1620009502**  
Issue No. **2**  
Date **24/01/2023**  
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## Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
1	10/01/2023	SMR	ME, KC	ME	First issue for Client review
2	24/01/2023	SMR			Final version addressing client comments

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## LIST OF ABBREVIATIONS

AA	Appropriate Assessment
Cm	Centimetre
DECC	Department of the Environment, Climate and Communications
DEHLG	Department for Environment, Heritage and Local Government
EC	European Commission
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EU	European Union
FPSOs	Floating Production, Storage and Offloading vessels
FSUs	Floating Storage Units
GSRO	Geoscience Regulations Office
Hz	Hertz
IEMA	Institute of Environmental Management and Assessment
IMO	International Maritime Organisation
IOSEA	Irish Offshore Oil and Gas Strategic Environmental Assessments
KADP	Kinsale Area Decommissioning Project
km	Kilometre
m	Metre
m <sup>2</sup>	Square metres
NIS	Natura Impact Statement
OSPAR	The Convention for the Protection of the Marine Environment of the North-East Atlantic
PTS	Permanent Threshold Shift
PUDAC	Permits to Use and Discharge Chemicals
SAC	Special Areas of Conservation
SPA	Special Protection Areas

AA	Appropriate Assessment
UKHO	United Kingdom Hydrographic Office
USBL	Ultra-Short Baseline

## 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 an application by PSE Kinsale Energy Limited (referred to herein as the applicant) for an Appropriate Assessment (AA) Screening Determination, submitted in respect of the end of operations seabed survey required as part of the Kinsale Area Decommissioning Project (KADP).

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 a review of the AA Screening Report and Fisheries Assessment Report submitted by the applicant. Public consultation on the information provided by the applicant has been undertaken by DECC. The consultation responses received by the DECC have been taken into consideration in the preparation of this report.

The information provided by the applicant is considered to be adequate and up to date for the DECC to issue an AA Screening determination, and no further information is required. The report provides a conclusion that can be used by the DECC to issue an AA screening determination. The table below summarises the overall conclusion of the AA screening report assessment.

### Summary of AA Screening Report Assessment for the proposed End of Operations Seabed Survey (KADP)

Outcome of Screening Report Assessment	Overall Screening Opinion / AA Required?
Project is not directly connected with or necessary to the management of Natura 2000 sites and is not likely to have Significant Effects on Natura 2000 Sites.	<b>No likely significant effects on Natura 2000 Sites have been identified, with regard to the potential connectivity with sites, relevant conservation objectives and the potential for in combination effects. No significant disturbance will be made to Annex IV species described. Appropriate Assessment is not required.</b>
<del>Project is not directly connected with or necessary to the management of Natura 2000 sites but is Likely to have Significant Effects on Natura 2000 Sites.</del>	<del><b>Appropriate Assessment is required because Likely Significant Effects on Natura 2000 sites, either individually or in combination with other plans or projects, cannot be excluded on the basis of the initial assessment (AA screening) provided by the applicant.</b></del>

## 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 with regards to the statutory assessment of an application by PSE Kinsale Energy Limited (herein referred to as the applicant) for an Appropriate Assessment (AA) Screening Determination, submitted in respect of the end of operations seabed survey required as part of the Kinsale Area Decommissioning Project (KADP).

### 1.1 Project Background

The applicant has submitted an application for consent to carry out the end of operations seabed survey required as part of the KADP.

The KADP comprises the decommissioning of the entire Kinsale Area gas fields and facilities in the North Celtic Sea Basin, which include:

- the Kinsale Head gas fields and facilities (including Southwest Kinsale and Ballycotton gas fields) (Petroleum Lease Area No. 1); and
- the Seven Heads gas field and facilities (Seven Heads Petroleum Lease).

It should be noted that KADP decommissioning activities and associated survey works have been subject to a number of separate consent applications, as summarised in Table 1.1.

**Table 1.1: Consent applications associated with the KADP.**

Consent Application	Scope of Consent Application	Status
(Nov 2018) Decommissioning of certain facilities within the Kinsale Head and Seven Heads gas fields <sup>1</sup>	<ul style="list-style-type: none"><li>• Plugging and abandoning of development wells</li><li>• The removal of two platform topsides structures</li><li>• The removal of a number of subsea facilities</li></ul>	Approved (Apr 2019)
(Aug 2019) Decommissioning of certain facilities within the Kinsale Head Petroleum Lease area <sup>2</sup>	<ul style="list-style-type: none"><li>• The removal of the Kinsale Alpha and Kinsale Bravo platform sub-structures (jackets) and all associated works</li></ul>	Approved (Feb 2020)
(Oct 2021) Decommissioning of certain facilities within the Kinsale Area gas fields <sup>3</sup>	<p>The application in relation to the Kinsale Head gas fields covers the following activities:</p> <ul style="list-style-type: none"><li>• The leaving in situ of all infield pipelines and umbilicals associated with the Kinsale Head gas fields</li><li>• The leaving in-situ of the 24" export pipeline (offshore and onshore section) and the filling of the onshore section with grout</li></ul>	Approved (Dec 2022)

<sup>1</sup> More information available at: <https://www.gov.ie>

<sup>2</sup> More information available at: <https://www.gov.ie>

<sup>3</sup> More information available at: <https://www.gov.ie>

Consent Application	Scope of Consent Application	Status
	<ul style="list-style-type: none"> <li>The use of engineering materials (Rock Placement) to protect the pipelines and umbilicals <i>in situ</i></li> </ul> <p>With regards to the Seven Heads gas field the application covers the following activities:</p> <ul style="list-style-type: none"> <li>The leaving in-situ all infield pipelines and umbilicals associated with the Seven Heads gas field</li> <li>The use of engineering materials (Rock Placement) to protect the pipelines and umbilicals <i>in situ</i></li> </ul>	
(Mar 2022) Conduct site clearance surveys of the Kinsale Head (including South West Kinsale & Ballycotton) and Seven Heads Gasfields <sup>4</sup>	The surveys are required to confirm seabed status on various sites following completion of decommissioning of subsea wells and associated facilities (non-intrusive surveys with no seabed interaction)	Approved (September 2022)

The Permits to Use and Discharge Chemicals (PUDAC) associated with the KADP specifies that "In line with OSPAR Agreement 17-02<sup>5</sup>, a monitoring study must be carried out by the Operator to assess the impact of the operations on the seabed. The design of this study must be submitted in advance to the GSRO for its approval".

This report has been prepared as a statutory assessment of the activities proposed by the applicant in their application for consent to carry out the end of operations seabed survey, and provides a conclusion that can be used by the DECC to issue an AA screening determination.

## 1.2 Documents Reviewed

The following documents have been reviewed to inform this report:

- Kinsale Area Decommissioning Project – PL-01/SH Petroleum Lease. Application to Conduct End of Operations Seabed Survey. Dated 7 November 2022;
- Letter to the Head of Geoscience Regulation Office (DECC). Kinsale Area Decommissioning Project: Application to Conduct End of Operations Seabed Survey – Kinsale Head & Seven Heads Gasfields. Dated 9 November 2022;
- Kinsale Area Decommissioning Project. Kinsale Area Installations: End of Operations Seabed Survey. Screening for Appropriate Assessment and Article 12 Assessment. November 2022;
- Kinsale Area Decommissioning Project. Kinsale Area Installations: End of Operations Seabed Survey. Pre-survey Fisheries Assessment Report. November 2022; and
- Kinsale Area Decommissioning Project. Kinsale Area Installations: End of Operations Seabed Survey. Response to Request for Further Information: Screening for AA. December 2022.

This report has been prepared by competent experts with 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 (IEMA).

<sup>4</sup> Additional information available at: <https://www.gov.ie>

<sup>5</sup> The Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR) Agreement 2017-02: OSPAR Guidelines for Monitoring the Environmental Impact of Offshore Oil and Gas Activities



## 2. TERMS OF REFERENCE

### 2.1 Legislative context

This report has been prepared having regard to European Commission (EC) Directive 2009/147/EC 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 European Union (EU) and Irish courts.

### 2.2 Relevant guidance

This report has been prepared having regard to guidance on appropriate assessment for planning authorities, published by the Department for Environment, Heritage and Local Government (DEHLG) in 2009<sup>6</sup>. In addition, the structure and content of this report is based upon the methodology published by the European Communities in 2002<sup>7</sup> and Commission notice C (2021)<sup>8</sup>.

### 2.3 Consultation

#### 2.3.1 Prescribed Bodies

The following bodies were notified of the foreshore licence application:

- Development Applications Unit, National Parks and Wildlife Service;
- Irish Maritime Administration, Department of Transport;
- Ship Source Pollution Prevention Unit, Irish Maritime Administration, Department of Transport;
- Marine Survey Office, Department of Transport;
- Irish Coast Guard (& National Maritime Operations Centre), Irish Maritime Administration, Department of Transport;
- Sea Fisheries Protection Authority;
- Sea Fisheries Policy Division, Department of Agriculture, Food and the Marine;
- Department of Defence;
- Mission Support Facility, Irish Air Corps;
- Naval Headquarters;
- Marine Institute, Marine Environment and Food Safety Services; and
- Director of e-Navigation and Maritime Services, Commissioners of Irish Lights.

Two responses were received from the notified bodies:

- Response from the Ship Source Pollution Prevention Unit, Department of Transport, received by DECC on 15 November 2022; and
- Response from the Marine Survey Office, Department of Transport, received by DECC on 29 November 2022.

The following observations were made by the Ship Source Pollution Prevention Unit:

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<sup>6</sup> DEHLG (2009) Appropriate Assessment of Plans & Projects - Guidance for Planning Authorities, Revision Notes added 2010, URL: <https://www.npws.ie>

<sup>7</sup> 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, URL: <http://ec.europa.eu>

<sup>8</sup> 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>

- Under the MARPOL Convention and EU law, as applicable in national law, ships may not cause pollution either by discharge to water or emissions to air, when at sea or when at berth in port. Ships include Floating Production, Storage and Offloading vessels (FPSOs), also called a "unit" or a "system"; and Floating Storage Units, (FSUs). Ships berthed at terminals at sea are also obliged to conform to the law.
- Management of ship waste (mainly oil, hazardous and polluting substances, sewage, garbage and polluting emissions to air) and of all cargo residues must be ensured as required under international maritime organisation (IMO), EU and national law. Under existing provisions ships are obliged to discharge waste and cargo residues at port and ports are obliged to provide adequate facilities for their reception from ships.

The following observations were made by the Marine Survey Office:

- A Marine Notice shall be published for the information of all local maritime users detailing the works and any vessels which may be engaged in said works during the survey operation phase.
- The applicant shall be obliged to inform the United Kingdom Hydrographic Office (UKHO) detailing the location and nature of the proposed works to ensure relevant navigation charts and nautical publications are updated. (Fax: 0044 1823 284077, email: [hdc@hdc.hydro.gov.uk](mailto:hdc@hdc.hydro.gov.uk)). Where bathymetry data is produced this shall be forwarded to UKHO so as that relevant navigation charts can be updated.

Appropriate regard has been given to the issues raised in these submissions.

DECC submitted a request for clarification to the applicant on the AA screening report, a response to which was received from the applicant on 16 December 2022, and published on 6 January 2023 for 14 days consultation. Only one response from the Marine Survey Office, Department of Transport was received on 6 January 2023. The Marine Survey Office, Department of Transport had no further comments to add in relation to the additional information provided.

### 2.3.2 Public Consultation

The application was advertised by the DECC on their website on 15 November 2022 following receipt of the application on 9 November 2022. Following subsequent receipt of all required documentation, the application completed validation on 14 November 2022. Invitations for submissions were advertised by DECC to be received by close of business on 4 January 2023 to ensure consideration by the Minister. No responses were received from the public in response to this consultation.

As indicated above, DECC submitted a request for clarification to the applicant on the AA screening report, a response to which was received from the applicant on 16 December 2022, and published on 6 January 2023, for 14 days consultation. No responses were received from the public in response to this consultation either.

### 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:	Kinsale Area Decommissioning Project (KADP) – End of Operations Seabed Survey
Project Type:	Post-Decommissioning Seabed Surveys
Applicant:	PSE Kinsale Energy Limited
Exploration Licence Reference:	Kinsale Head Petroleum Lease (OPL 1) Seven Heads Petroleum Lease
Date AA Screening Report Received:	9 <sup>th</sup> November 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 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**

<p><b>Brief Project Description:</b></p> <p>The PUDAC associated with the KADP specifies that "In line with OSPAR Agreement 17-02, a monitoring study must be carried out by the Operator to assess the impact of the operations on the seabed. The design of this study must be submitted in advance to the GSRO for its approval".</p> <p>Accordingly, seabed sampling will be undertaken to confirm seabed sediment type, existing contamination status and faunal community type, comparing results with pre-decommissioning surveys undertaken in 2017.</p> <p>Seabed sampling will take place using the research vessel RV Tom Crean (or equivalent). Seabed samples will be collected from the upper 20 cm of surface sediments (approximately) using a Day grab (or equivalent) with a surface area of 0.1 m<sup>2</sup>. A drop-down camera will be used to collect seabed imagery prior to any samples being collected. Equipment will be positioned using an acoustic USBL system (Ultra-Short Baseline (acoustic positioning system)) operating at a frequency of 20-40 Hz. At each of the anticipated 33 sample stations (located within 33 km from the coast of Cork), two successful Day grab deployments will be subsampled in order to collect all the required samples for onshore analysis. Sample stations are located at the following locations:</p> <ul style="list-style-type: none"> <li>• Seven heads fields – 6 stations;</li> <li>• SW Kinsale and Greensand Wellheads – 6 stations;</li> <li>• Kinsale Head platforms and fields– 17 stations;</li> <li>• Ballycotton Wellhead – 2 Stations; and</li> </ul>
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<ul style="list-style-type: none"> <li>• Kinsale Head-shore export pipeline – 2 stations.</li> </ul> <p>All 33 sampling stations have previously been surveyed and are located in water depths between 85 m and 110 m.</p> <p>The estimated duration of seabed sampling activities is 2-3 days (excluding possible weather standby) and is planned for Q1/Q2 2023 following the completion of decommissioning works.</p>	
<b>Project Element</b>	<b>Have these features of the project been identified by the applicant? (If not, please provide details)</b>
Spatial Extent (size, scale, area etc)	<p><b>Yes</b> – The applicant has provided an adequate description of the spatial extent of the project.</p> <p>Figures presenting the location and coordinates of the seabed surveys have been provided by the applicant in the application documents (Application to Conduct End of Operations Seabed Survey – Appendices A and B; Screening for AA Report – Figures 1.1 and 2.1 and Table 2.2; Pre-survey Fisheries Assessment Report – Figures 1.1, 2.1 and Table 2.2). It is noted that the legend in Figure 1.1 does not identify the red dots, however, it is gathered, from the Figure title, that these indicate the location of sample stations, and legends in other figures confirm this (e.g. Figure 2.1).</p>
Supporting Infrastructure	<b>Not applicable</b> – no supporting infrastructure is directly required for this project.
Transportation Requirements	<p><b>Yes</b> – One survey vessel will be used, anticipated to be the research vessel RV Tom Crean (or equivalent).</p> <p>It is recommended that DECC request the applicant to confirm the survey vessel and equipment to be used (if any) to make sure that the assumptions used in the Screening for AA Report remain valid.</p>
Physical changes that will result from the project (e.g. from excavation, dredging)	<p><b>Yes</b> – The applicant indicates there will be interaction with the seabed through the use of a Day grab (or equivalent), which has a surface area of 0.1 m<sup>2</sup>. A total sampled area of up to 0.2 m<sup>2</sup> per sampling station is expected with a resultant total area of 6.6 m<sup>2</sup>. No pathway for interaction associated with seabed interaction and Natura 2000 sites and associated features is identified by the applicant.</p>
Emissions and Waste	<p><b>Yes</b> – The applicant provides information on underwater noise anticipated to be generated from the USBL system and vessel transit, and makes reference to the fact that no significant discharges would be anticipated. There is no mention of atmospheric emissions, waste generation or accidental releases. However, due to the nature and duration of the proposed survey, pathways for interaction with natura 2000 sites and associated features can be considered unlikely, and their consideration would have not had implications on the conclusions of the report. It should also be noted that they are considered separately in the EIA screening report prepared by the applicant.</p>
Resource Requirements (e.g. water abstraction)	<p><b>Yes</b> – The applicant indicates the extent of seabed area to be sampled. There is no mention of fuel consumption. However, due to the nature and duration of the proposed survey, its consideration would have not had implications on the conclusions of the report. It should also be noted that this is considered separately in the EIA screening report prepared by the applicant. No other resources are required to support the proposed survey.</p>
Duration of each phase	<p><b>Yes</b> – The estimated duration of seabed sampling activities is 2-3 days (excluding possible weather standby) and is planned for Q1/Q2 2023 following the completion of decommissioning works.</p>

The AA screening must consider the effects of the project 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**

<b>Brief Description of identified plans / projects that might act in-combination (Operational, Consented and Proposed projects) with the proposed project:</b>		
<p>The applicant's screening for AA report considers the following projects that might act in-combination with the proposed project:</p> <ul style="list-style-type: none"> <li>Existing users and activities within the wider Kinsale area, including shipping and fishing activity. The applicant notes that due to the duration of the proposed end of operation survey (2-3 days), significant in-combination effects are unlikely;</li> <li>The applicant has also identified the potential for interaction of the proposed end of operation survey with Two Foreshore Licence applications in relation to offshore wind farm site investigation work in the territorial waters off Cork. The proposed programme associated with both Licence applications indicate a three-year window for survey completion (2020-2023). The applicant has stated that the duration and scale of the proposed end of operations survey are such that there is considerable scope to avoid interactions.</li> <li>The applicant has identified the potential for future development associated with the Barryroe oil discovery, however, licence applications for the appraisal or development of the field are yet to be made, and therefore interactions are not expected.</li> <li>On the basis of the above, no in-combination effects associated with relevant future planned developments are reported. The applicant has stated that they will maintain awareness and dialogue with the developers of both wind farms, and any further proposals in relation to the Barryroe field, to ensure that activities do not proceed in a matter which could lead to in-combination effects</li> </ul>		
<b>Project Element</b>	<b>Is the predicted magnitude / extent of identified likely in-combination effects considered by the applicant?</b>	<b>Summary</b>
Spatial Extent (define boundaries for examination of in-combination effects)	Yes	<p>The applicant has not explicitly defined the spatial boundaries for examination of in-combination impacts but identifies existing and future activities relevant to the Kinsale area.</p> <p>The applicant has stated that the duration and scale of the surveys is such that there is considerable scope to avoid interactions with other projects which could give rise to in-combination effects and considers the proposed survey unlikely to represent a source of in-combination effect.</p>
Impact Identification (e.g. noise, chemical emissions etc.)	Yes	<p>Although the nature of potential in-combination effects is not described in detail, the applicant indicates that the source of in-combination effects would be related to the spatial / temporal overlap of the proposed survey with other ongoing activities and projects, and justifies that the duration and scale of the surveys is such that there is considerable scope to avoid interactions with other projects which could give rise to in-combination effects and considers the proposed survey unlikely to represent a source of in-combination effect.</p> <p>The applicant has stated that they will maintain awareness and dialogue with the developers of both wind farms, and</p>

		any further proposals in relation to the Barryroe field, to ensure that activities do not proceed in a matter which could lead to cumulative impacts.
Pathway Identification (e.g. via water, air etc)	Yes	Although there is no specific reference to pathways associated with potential in-combination effects, the applicant indicates that the source of in-combination effects would be related to the spatial / temporal overlap of the proposed survey with other ongoing activities and projects, and justifies that the duration and scale of the proposed survey is such that there is considerable scope to avoid interactions with other projects which could give rise to in-combination effects and considers the proposed survey unlikely to represent a source of in-combination effect.

### 3.3 Identification of relevant European sites and species

The applicant's AA screening report considers 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.

The applicant's response to the request for further information further clarifies the application of a 15 km boundary range as a criterion associated with underwater noise potential impacts, which is considered appropriate.

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 identified the following impact sources for further consideration in the determination of likely significant effects:</p> <ul style="list-style-type: none"> <li>• Physical presence of the survey vessel; and</li> <li>• Underwater noise including from the vessel and USBL positioning equipment.</li> </ul>

<b>Do you agree with the applicant's AA screening assessment? Why?</b>
<p>Yes. We agree with the applicant's AA screening assessment for the following reasons:</p> <ul style="list-style-type: none"> <li>We agree with the premise that additional vessel traffic would be negligible over that already present in the region based on Irish Offshore Oil and Gas Strategic Environmental Assessments (IOSEA) data reviewed by the applicant, and that no likely significant effects would be expected given the low to moderate sensitivities to shipping traffic in the relevant species, and short/low magnitude effects that the survey vessel would represent; and</li> <li>We agree with the premise that underwater noise generated by vessel transit and USBL positioning equipment is unlikely to exceed sound levels at which permanent damage to marine mammals and fish can happen (i.e. sound levels estimated are below marine mammal permanent threshold shift (PTS)) and below criteria for fish mortality and potential injury. We also agree that due to the transient nature and short duration of the proposed survey, behavioural disturbance on marine mammals, fish and diving birds is expected to be negligible, and no likely significant effects would be expected.</li> </ul>

### 3.5 Screening Determination

If significant effects are certain, likely or uncertain then the DECC must request that 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 and triggered the need for an AA.

Tables 3.6 and 3.7 provide a summary of Ramboll's recommendation to enable 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?	<b>No</b>
Is the project or plan likely to have significant effects on the environment?	<b>No</b>
Is an AA required? (Yes / No / More Information Required?)	<b>No</b>
What further information is required to inform AA Screening Opinion (if any)?	<b>N/A</b>

**Table 3.7: Summary of AA Screening Report Assessment for the proposed End of Operations Seabed Survey (KADP)**

<b>Outcome of Screening Report Assessment</b>	<b>Overall Screening Opinion / AA Required?</b>
Project is not directly connected with or necessary to the management of Natura 2000 sites and is not likely to have Significant Effects on Natura 2000 Sites.	<b>No likely significant effects on Natura 2000 Sites have been identified, with regard to the potential connectivity with sites, relevant conservation objectives and the potential for in combination effects. No significant disturbance will be made to Annex IV species described. Appropriate Assessment is not required.</b>
<del>Project is not directly connected with or necessary to the management of Natura 2000 sites but is Likely to have Significant Effects on Natura 2000 Sites.</del>	<del><b>Appropriate Assessment is required because Likely Significant Effects on Natura 2000 sites, either individually or in combination with other plans or projects, cannot be excluded on the basis of the initial assessment (AA screening) provided by the applicant.</b></del>

## APPENDIX 1: IDENTIFICATION OF RELEVANT EUROPEAN SITES/SPECIES AA SCREENING CHECKLIST

<b>Natura site/ Annex IV species identified by assessor</b>	<b>Distance from Project Site (km)</b>	<b>Are the Natura site / Annex IV species identified by the applicant?</b>	<b>Are all the qualifying interests / Annex IV species listed by the applicant?</b>	<b>Are direct impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are in combination effects considered by the applicant?</b>	<b>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:</b>
<b>Roaringwater Bay and Islands SAC (000101)</b>	74 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Blasket Islands SAC (0002172)</b>	188 km	Yes	Yes	Yes	Yes	Yes	Yes	The response to request for further information provided by the applicant clarifies that otter ( <i>Lutra lutra</i> ) is not a qualifying feature of the site, noting that this does not affect the assessment outcome. Consideration meets minimum requirements.
<b>Rockabill to Dalkey Island SAC (0003000)</b>	260 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Bandon River SAC (0002171)</b>	69 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.



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<b>Blackwater River (Cork/Waterford) SAC (0002170)</b>	56 km	<b>No</b>	Yes	Yes	Yes	Yes	Yes	The response to request for further information provided by the applicant clarifies that reference to otter ( <i>Lutra lutra</i> ) should be added, noting that this does not affect the assessment outcome. Consideration meets minimum requirements.
<b>River Barrow and River Nore SAC (0002162)</b>	113 km	<b>No</b>	Yes	Yes	Yes	Yes	Yes	The response to request for further information provided by the applicant clarifies that reference to otter ( <i>Lutra lutra</i> ) and reefs should be added, noting that this does not affect the assessment outcome. Consideration meets minimum requirements.
<b>Lower River Suir SAC (0002137)</b>	113 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.

<b>Natura site/ Annex IV species identified by assessor</b>	<b>Distance from Project Site (km)</b>	<b>Are the Natura site / Annex IV species identified by the applicant?</b>	<b>Are all the qualifying interests / Annex IV species listed by the applicant?</b>	<b>Are direct impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are in combination effects considered by the applicant?</b>	<b>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:</b>
<b>Slaney River Valley SAC (0000781)</b>	156 km	Yes	Yes	Yes	Yes	Yes	Yes	The applicant has included Atlantic and Mediterranean salt meadows in the list of qualifying interests, but these are not listed within the site. This erratum is not considered to affect the assessment outcome. Consideration meets minimum requirements.
<b>Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC (UK0030396)</b>	185 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>North Anglesey Marine / Gogledd Môn Forol SAC (UK0030398)</b>	294 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>West Wales Marine/Gorllewin Cymru Forol SAC (UK0030397)</b>	166 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>North Channel SAC (UK0030398)</b>	370 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.

<b>Natura site/ Annex IV species identified by assessor</b>	<b>Distance from Project Site (km)</b>	<b>Are the Natura site / Annex IV species identified by the applicant?</b>	<b>Are all the qualifying interests / Annex IV species listed by the applicant?</b>	<b>Are direct impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are in combination effects considered by the applicant?</b>	<b>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:</b>
<b>Ballymacoda Bay SPA (0004023)</b>	49 km	Yes	Yes	Yes	Yes	Yes	Yes	The applicant has provided an updated assessment for this site in the response to request for further information, in which common gull ( <i>Larus canus</i> ) has been added, noting that this does not affect the assessment outcome. Consideration meets minimum requirements.
<b>Ballycotton Bay SPA (0004022)</b>	42 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Courtmacsherry Bay SPA (IE0004219)</b>	42 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Cork Harbour SPA (0004030)</b>	37 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Helvick Head to Ballyquin SPA (0004192)</b>	62 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Old Head of Kinsale SPA (0004021)</b>	33 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Saltee Islands SPA (0004002)</b>	119 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Puffin Island SPA (0004003)</b>	168 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.

<b>Natura site/ Annex IV species identified by assessor</b>	<b>Distance from Project Site (km)</b>	<b>Are the Natura site / Annex IV species identified by the applicant?</b>	<b>Are all the qualifying interests / Annex IV species listed by the applicant?</b>	<b>Are direct impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are indirect impacts to the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are Potential Zones of Influence on the Natura Site / Annex IV species considered by the applicant?</b>	<b>Are in combination effects considered by the applicant?</b>	<b>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:</b>
<b>Cliffs of Moher SPA (0004005)</b>	322 km	Yes	Yes	Yes	Yes	Yes	Yes	The qualifying feature Clough ( <i>Pyrrhocorax pyrrhocorax</i> ) has not been included; however, it is recognised this is due to the distance of the Project site from the SPA. Consideration meets minimum requirements.
<b>Skelligs SPA (0004007)</b>	162 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Blasket Islands SPA (0004008)</b>	189 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>The Bull and The Cow Rocks SPA (0004066)</b>	136 km	Yes	Yes	Yes	Yes	Yes	Yes	The applicant has provided an updated assessment for this site in the response to request for further information, in which Atlantic puffin ( <i>Fratercula artica</i> ) has been added, noting that this does not affect the assessment outcome. Consideration meets minimum requirements.
<b>Lambay Island SPA (0004069)</b>	291 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Magharee Islands SPA (0004125)</b>	246 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.

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<b>Dingle Peninsula SPA (0004153)</b>	194 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Iveragh Peninsula SPA (0004154)</b>	144 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Beara Peninsula SPA (0004155)</b>	120 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Deenish Island and Scariff Island SPA (0004175)</b>	145 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Kerry Head SPA (0004189)</b>	255 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA (UK9014051)</b>	130 km	Yes	Yes	Yes	Yes	Yes	Yes	The applicant has provided an updated assessment for this site in the response to request for further information, in which Atlantic puffin ( <i>Fratercula artica</i> ) has been added, noting that this does not affect the assessment outcome. Consideration meets minimum requirements.
<b>Grassholm SPA (UK9014041)</b>	173 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.
<b>Irish Sea Front SPA (UK9020328)</b>	323 km	Yes	Yes	Yes	Yes	Yes	Yes	Consideration meets minimum requirements.

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<b>Copeland Islands SPA (UK9020291)</b>	418 km	<b>No</b>	Yes	Yes	Yes	Yes	Yes	Arctic tern not included; however, it is recognised this is due to the distance of the Project site from the SPA. Consideration meets minimum requirements.
<b>Aberdaron Coast and Bardsey Island SPA (UK9013121)</b>	254 km	<b>No</b>	Yes	Yes	Yes	Yes	Yes	The qualifying feature Clough ( <i>Pyrhacorax pyrrhacorax</i> ) has not been included; however, it is recognised this is due to the distance of the Project site from the SPA. Consideration meets minimum requirements.