FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

Public Consultation

(Under Section 19 of the Foreshore Act 1933, and Regulation 42(6) of the European Communities (Birds and Natural Habitats)

Regulations 2011)

From: @yahoo.ie>

Sent: Sunday 22 January 2023 12:30

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks

Offshore Wind Farm

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To whom it may concern,

I live in Rossaveal which the Department of Marine are vuilding the new deep-water Quay which if this application goes ahead will give Rossaveal a big boost with the company using the area as a hub for wind energy. I believe this will give other companies the opportunity to build in the area for the wind industry giving employment for Rossaveal and the wider Connemara area. I think this project will give Ireland the wind energy boost it needs with the consent wind on the west coast. I would agree and want this project to go ahead which I hope the Minister agrees on. It will he a big investment to Connemara for generations to come.

Kind regards,



31St January 2023

Re Submission on FS007161.

A Chara,

We would make the following submissions on FS007161. Sceirde Rocks. Foreshore Application

1. Applicant Details.

The address given on the application, is not the registered address of the company.

2. Proposed Development Activity.

• The description contained in the application below is legally incorrect. This FS007161 application, (and especially its associated maps), is <u>not</u> eligible ,as stated in The Proposed Development Activity description in bold below , because it states

"Sceirde Rocks Offshore Wind Farm is a fixed bottom offshore wind farm off the West Coast of Ireland and under the Transitional Protocol is recognised as a Relevant or Phase One project. As such, Sceirde Rocks Offshore Wind Farm is a high priority project and it is anticipated that this project will be prioritised through the Foreshore License process, the MAC award process"

However as can be clearly seen from the maps below This FS007161 application is a completely a different array area, and approx. 3 times the size of that applied for, and granted eligible for Phase 1 surveying activities. . It is not a "small amendment" as stated by the applicant in Feb 2022.

The Project Description states "

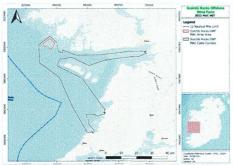
This application specifically relates to a foreshore license for site investigation activities in the wind farm array area only."

However the Wind Farm array area as show in the FS007161 is not the same and 3 times the size

The maps on the following page demonstrates this point

However the MAC Consent area under Phase One projects December 2022 is as map 2022- MAC -007.

Exhibit 1

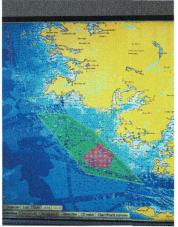


This application FS007161 states that "specifically relates to a foreshore license for site investigation activities in the wind farm array area only."

However the Wind Farm array area as show in Exhibit 2 in the FS007161 is over 3 time the array area applied for and granted under the Phase 1 Transitional protocol therefore the assertion in the application FS007161 that this larger Array area comes under Phase1 is incorrect and cannot legally be surveyed under Phase1 MAC Grant of Dec 2022 Exhibit 2



. **And Exhibit 3 shows** this application **FS007161** area (in GREEN) and shown overlay the Grant area (in PINK)under Transition Protocol Phase 1.



Therefore this clearly demonstrates that this larger array in FS007161 area is not in phase 1 Transition Legislation

2. Effect on Livelihood.

We ask you to access this application in the light of the constitutional right of the fishermen fishing under article __of the Constitution and The obligation of the Government of Ireland is oblidged not to Grant a licence/lease /or demise that does not take into account "valid private interest". The Submission is made by a family of fishermen who have fished these 30,000 acres for centuries.

We ask that we construe to be allowed to quietly the 30,000 acres fishing grounds that have provided our livehood for generations based on the constitutional right under Article

In absence of a refusal to grant the enlarged area north of the original Grant that The Department and Government agencies have a constitutional requirement to conditioned any licence granted to enforce the applicant or the Giverment to take into account and compensate for

- a. the immediate loss of surveying disruption,
- b. the loss of 30,000 acres of fidshing ground due to "Artificial Islands" 500m non navigation (i.e I sq kilometer for each turbine) away from all around This will require twice daily detour around this and the sterilising of 30,000 acres for pot fishing.
- c. and the ongoing consequential loss of extra navigation costs, lost time and fuel, to go around the array and further of which there is very little left when the legislation is obeyed
- d. the consequential loss of the fish stocks to surveying damage which is well documented.

3. Damage to Shellfish.

Especially affected is whos livelihood and fishing ground of over 30,000 acres of array will be bombarded with Geotechnical Geophysical surveys and the Acoustic survey equipment listed in FS007161 application and according to the schedule of works under FS00761 with seismic survey

That type of survey listed in the application has been proven by open water University in Scotland and Australia, Norway and Canada Those studies show a major detrimental affect on the lobster and crab lifecycle,

"I have genuine concerns about the impact that the Defendants' survey and/or site investigations will have upon the lobsters in this area and upon which I rely for my livelihood. I say that the average life cycle of a lobster is seven years. I say and believe that there are studies which indicate that the equipment used in the course of these surveys and/or site investigations have the potential to disrupt the only doubt being for how long and over 60 number of 60-70 meter deep sterilised under the MAC contend maintain that this Array of 141 sq Kilometers i.e 14,100 hecacres or over (area constitutes and I also say the life cycle of the lobster and/or may result in malformed lobsters. This would be devastating for my livelihood."

Valid Private intrest.

In summary on Point 2 & 3

We ask that the Department or Government Agencies in arriving at their decision that based on the information now available freely from respected independent Universities ,which are

available to everybody therefore decision makers, and applicants should know of the potential damage if the that the enlargement of the survey area north of the Granted MAC area be permitted.

And if application FS007161 is permitted that it be conditioned that no such sesmic or acoustic equipment be used at all .

or

Alternatively without a consequential loss guarantee between the applicant and the valid private interest of a steel and the steel as the main fishermen in the area of the array north of Sceirde rock and other fishermen.

Application Scope of works is out outside that allowed in the Foreshore re Act Legislation

Survey application schedule of works is possibly unlawful lif carried out and can not be legally licenced under the Foreshore Acts

The Boreholes proposed in FS 007161 is over 30 ft deep, which are outside the remit of the Foreshore Act applications and legislation.

We would Ask the Department and it Agencies to examine the legal basis, or their legal right, of its granting a foreshore licence to an applicant or application that clearly state that the applicant, are as part of the survey to drill up to 60 investigative bore holes (ie" bore holes will not exceed 70M)

That is deeper that the 30ft deep that is clearly all that is all that allowed under the foreshore acts.

We are aware that the interests of all sides have to be balanced, but it should not be at the total cost to one sector, and for the total profit of the other. There is a way to proceed with a balanced approach. This FS007161 application is not a balanced approach.

Yours Sincerely



All the lands and waters, mines and minerals, within the territory of the Irish Free State (Saorstát Eireann) hitherto vested in the State, or any department thereof, or held for the public use or benefit, and also all the natural resources of the same territory (including the air and all forms of potential energy), and also all royalties and franchises within that territory shall, from and after the date of the coming into operation of this Constitution, belong to the Irish Free State (Saorstát Eireann), subject to any trusts, grants, leases or concessions then existing in respect thereof, or any valid private interest therein, and shall be controlled and administered by the Oireachtas, in accordance with such regulations and provisions as shall be from time to time approved by legislation, but the same shall not, nor shall any part thereof, be alienated, but may in the public interest be from time to time granted by way of lease or licence to be worked or enjoyed under the authority and subject to the control of the Oireachtas: Provided that no such lease or licence may be made for a term exceeding ninety-nine years, beginning from the date thereof, and no such lease or licence may be renewable by the terms thereof.

From: yahoo.ie>
Sent: Wednesday 1 February 2023 21:20

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks

Offshore Wind Farm

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co Galway

I wound like to make a submission on the

FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

I fish in the proposed area and have concerns about my livelihood and the effects on fish stocks from this project .

From: @hotmail.com>

Sent: Wednesday 1 February 2023 21:35

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks

Offshore Wind Farm

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co. Galway.

I'm making a submission against

FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

I fish in the proposed area for years I have restocked fish in that area,I have heavily invested into the fishing industry I'm

Deeply concerned about the future of my livelihood and fishing industry for me and my family from the effect of this proposed projected.

Sent from my iPhone

From: @hotmail.com>
Sent: Thursday 2 February 2023 11:39

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: SUBMISSION: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed

Sceirde Rocks Offshore Wind Farm

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<u>Submission regarding -FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for</u> the proposed Sceirde Rocks Offshore Wind Farm

A Chara,

| My name is | from | My husband and I are the owners |
|------------|------|---------------------------------|
| of the | | |

Our vessel fishes for crab, lobsters as well as well as gillnetting and jigging around the Aran Islands, working both North and South sides depending on fishery seasons.

I want to highlight my concern in this submission.

During the geophysical survey carried out in and around June 2021 of the area, there was a noticable increace of potting effort around the Aran Islands, by fishermen from Conemmara who were displaced during the survey period.

Aran Islanders have fished around our Islands for generations. This displacement greatly impacts our fishing limited area, business and and puts further pressure on the stocks.

Other Island Fishermen have the same concern.

I hope my submission will be given consideration.

I would appreciate acknowledgement of receipt of this email.

Le meas,

15/2/23.

REF: APPLICATION FOR FORESHORE LICENCE RE, SCEIRDE ROCKS WIND FARM PROJECT.

WE OPERATE SEA AMELING, CHARTER, BOATS
OUT OFF ROUNDSTONE, & FOR Over 30 YEARS, 3
MOST OFF OUR FISHING IS DONE WITHIN THE
AREA THE PORESHORE, LICENCE IS BEEN APPLIED FOR

THESPANNING

THE FORESHORE LICENCE LIES WITHIN GROUND'S

FOR MOST SPECIE'S OFF. PISH, WE ARE WORRIED

THAT THE SURVEY METHOD'S USED. (BORFHOLE

SAMPLING, AND SHALLOW SAMPLING WILL HAVE.

A HUGE NEGATIVE EFFECT ON FISHING AS THE

PISH WILL MOVE OFF THE GROUND + RESULT IN A

BIG LOSS OFF INCOME OUBR THE NEXT PEW YBAR'S

FOR OUR BUSINESS.

Department of Housing, Planning & Local Government

17 FEB 2023

Foreshore Section
Department of Housing
Local Government and Heritage
Newtown Road, Wexford
Co Wexford

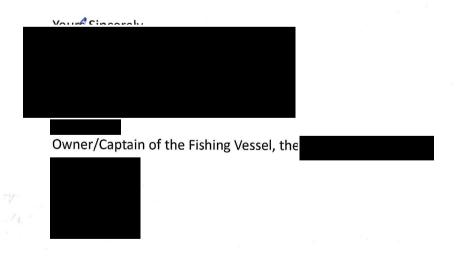
17 February, 2023

A Chara.

Please consider this submission regarding FS007161, Sceirde Rocks Offshore Wind Farm, Foreshore Application. We have grave and serious concerns on the grounds that;

- 1. This is a fertile fishing ground for crayfish. It is one of, if not the best, crayfish fishing ground in Ireland. We will not be able to fish the grounds if the turbines go in. We also rely on fishing for lobster and crabs here, which we will no longer be able to do with this plan.
- 2. Compensation was given to fishermen in the neighbouring villages to the south of us. Once they were put off their fishing grounds, they came onto ours instead. We were given no compensation, even though our grounds are being taken over by other fishermen. This was, and will be a serious detriment to our livelihoods.
- 3. We have grave concerns about the effect of this project on the biodiversity of the natural habitat, for instance the adverse effect on the coral reefs in the area.
- 4. We attended a meeting in Roundstone earlier in February. Nobody there seemed to know anything. They were unable to answer any of our questions. We need somebody to honestly tell us what is going on, and how we will be further impacted. So far, we have no faith in anyone associated with this project to deal with us in an open and supportive way.

We are more than willing to working with Fuinneamh Sceirde Teoranta on this issue, but our concerns need to be addressed in a transparent and constructive way.



From: @gmail.com>

Sent: Tuesday 21 February 2023 17:38

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks

Offshore Wind Farm

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To whom it concerns

Regarding the Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm, I wish to advise that any development on the sea bed around Sceirde would be detrimental to maritime ecology, to fragile ecosystems around the coast and would negatively impact the coast and surrounding areas.

The financial and environmental cost of putting such structures in place could not be justified.



Co Galway.

Submission for Application FS007161 23/02/23

To Whom It Concerns,

My name is and I'm a resident of Co. Galway. I'm writing in regard to the application FS007161 by Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Wind Farm.

I believe that, before permission is granted for this survey, there needs to be a review as to what impact the proposed mega turbines (30 x 15 MW turbines) will have on the environment and landscape above and below the water line. The Sceirdre Rocks are a unique feature of the west coast. MacDara Island, the closest island to the rocks, has one of the best examples in Ireland of an early Cristian oratory. Approval was given for a wind farm in the area many years ago, before these mega turbines became a possibility. The company seeking permission to go ahead with this current project have still not produced an in scale visual representation of what these mega turbines will actually look like in the area. At 280 metres tall, they are only slightly shorter than the Eiffel Tower.

There has been much success in developing the Wild Atlantic Way. Both the Sceirde Rocks and MacDara's Island are an integral part of the beauty and wildness of this coast. Carna and its neighbouring villages are trying to bring tourism into the area. A project of the scale proposed in application FS007161 will desecrate such a wild and beautiful area and will certainly have a negative impact on tourism.

I'm alarmed and disappointed by the glaring lack of adequate marine life protection proposed in this application. The proposed area for development is a large shallow reef between Sceirde Rocks and MacDara Island. This is a unique environment and provides an excellent habitat for lobster and crab. Local fishermen have fished these waters sustainably for generations. The drilling and associated disturbance proposed in application FS007161 will have huge repercussions for this habitat. The agenda proposed in the application seems to have little regard for the marine environment. The only monitoring for the protection of marine mammals listed in this application appears to be an MMO (Marine Mammal Observer) on deck with a pair of binoculars.

Another major concern with the proposed project is the effect it will have on the Mace Head weather station. The station is one of 6 profoundly important stations in the world due to it's pristine and isolated location which allows it to monitor changes in air quality. If the proposed wind farm goes ahead the station will have to be relocated due to the impact the turbines will have on air movement and the contamination of the air by pollutants produced during the construction phase as well as the use of anti corrosion chemicals on a maintenance basis. Mace Head weather station reported that it recorded the cleanest air in Europe last year. This station should be allowed to continue its vital work in its current location

There is another option. Many countries in Europe now insist that offshore wind farms must be located at least 15-20km from the shore. Beyond the horizon. These are floating structures that can be anchored in operation and removed when decommissioned. I believe that this was not an option when permission was first granted for a wind farm in the Sceirde Rock area.

I know there is a rush to get wind farms up and running to reduce our carbon emissions before 2030. I believe that planning for a floating wind farm further offshore could be fast tracked. This would allow us to avoid making a decision that could be regretted for generations to come. Ireland is fortunate enough to have a unique and beautiful Wild Atlantic Way. Let's keep it that way.

| Yours sincerely, | |
|------------------|-------------|
| | |
| | Co.Galway |
| | |

Submission to Foreshore License Application FS007161: Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm.

To Whom It May Concern,

26/02/23

I am a resident of Carna, Co. Galway. I'm submitting this objection/submission to the proposed Foreshore License Application (FS007161) by Fuinneamh Sceirde Teoranta (FST), for the proposed Sceirde Rocks Offshore Wind Farm (450 MW) located off Carna, Co. Galway.

If Application FS007161 is granted permission to proceed, this government can be credibly accused of green-washing by promoting it's 'fast-tracking' of wind-generated energy production for Ireland while disregarding the significant negative environmental consequences to the local seabed, the marine life that inhabits it, the coastal landscape and the fishing and tourism that sustain this pristine section of coastline along Ireland's 'Wild Atlantic Way' in Connemara.

The government is right to encourage green energy. Wind and solar farms are necessary for Ireland to meet its green energy targets. The benefits of wind farms to the climate and environment have been well documented. However, because of their enormous size and nearly constant movement, wind farms also have detrimental consequences of significant visual and acoustic impact and disruption to their local environments, wildlife and communities. We have all been affected by these negative attributes of wind farms as they have been erected on land around Ireland. Because of the vast size of large wind turbines and their effects on the environment and communities, the Irish government should hold wind farm developers/companies to the highest standards of transparency, engagement and protection of Irish land and marine environments and communities.

The wind farm proposed in Application FS007161 is huge (30 x 15MW turbines = 450 MW), fixed bottom and nearshore (nearest offshore turbine located 5km from shore). The 2008 Environmental Impact Assessment by FST for the Sceirdre Rocks Wind Farm specifies a 20 x 5MW turbines = 100 MW (http://www.fsteo.com/Non-Technical Summary.pdf). This current application (FS007161) specifies a wind farm producing over 4 times the power and requiring many more turbines nearly twice the size of those specified in the 2008 application.

Given the vast size of this proposed offshore wind farm, it is crucial that the government ensure a) that Ireland's environment, habitats, marine life, landscapes and communities are not damaged and b) that the wind farm developers/owners are held to the highest levels of rigorous disclosure and transparency.

I have the following questions regarding Application FS007161 and the proposed Sceirdre Rocks Wind Farm:

1) Is Macquarie's Green Investment Group (GIG) the best company with which to entrust an industrial project of this scale? Fuinneamh Sceirde Teoranta (FST) and its manager's Corio Generation are owned by Macquarie's Green Investment Group (International investment bank Macquarie buys Irish offshore wind farm development (irishexaminer.com)). Macquarie Group have a poor track record in terms of financial management, maintenance of infrastructure, and protection of the environment. For example: How Macquarie bank left Thames Water with extra £2bn debt - BBC News. Macquarie's Green Investment Group (GIG) includes independent trustees, as part of the sale to Macquarie group by the UK Government. In their most recent annual letter (Letter from the GPC (greeninvestmentgroup.com)) these independent trustees highlighted concerns with regard to GIG's risk and opportunity management: "The identification, assessment and management of ESG (Environmental, Social and Governance) risks is core to GIG's principles and policies and to the Green Governance Framework. We encourage GIG to consider enhanced disclosure of such risks and its risk management framework. This should include the methods to assess and mitigate risk, and to realise opportunities." The trustees also note concerns related to disclosure: "Disclosure is an area where, in our view, GIG is now at risk of falling significantly behind peers and leading practice. To maintain credible global leadership and influence within green investment policy, process and practice, GIG should aspire to leading edge disclosure practices. As noted above, there are several areas where disclosure could be improved. These include risk, stakeholder

engagement and the metrics and targets associated with GIG's commitments to net zero, among others." Given the scale of the risk involved – drilling 60 boreholes into the seabed in an important marine area cannot be without impact – is this really the type of actor we wish to have involved? How can any of the documents associated with the foreshore licence application be taken at face value if the independent trustees tasked with ensuring that GIG delivers truly impactful and effective green infrastructure projects are highlighting a lack of transparency across multiple key areas of GIG's work?

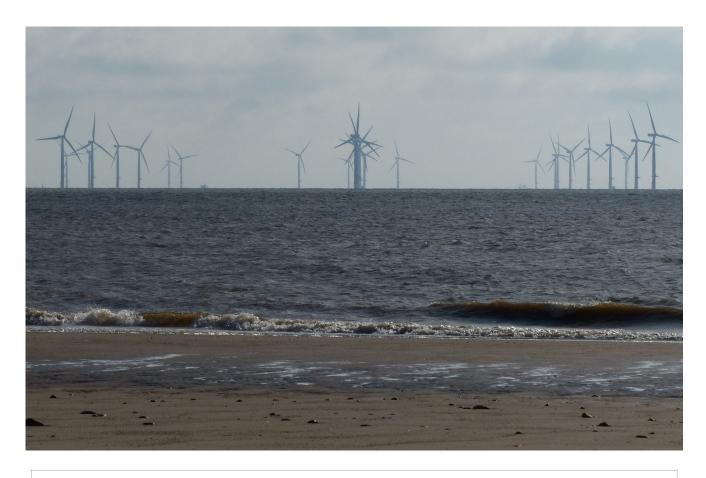
- 2) Why does government not require wind developers like FST/Corio to be more transparent and forthcoming about all the potential consequences of their proposal? As mentioned above, GIG has a poor record of stakeholder engagement. FST/Corio Generation/GIG's behaviour regarding 'stakeholder engagement' in the proposed Sceirdre Rocks Wind Farm seems to be the minimal required by law and does not inspire trust or goodwill. I'm a member of the community living nearest to this proposed development yet I've not been contacted by FST/Corio to discuss what impact I might experience from the proposed wind farm. The information presented by FST/Corio/GIG has been accomplished with the most minimal of public display: the foreshore application was posted in 3 journals on Fri, Dec 23rd when most people were concentrating on the imminent weekend Xmas celebrations and work holidays. Hard copies of the applications were posted in public spaces such as Garda stations and public libraries not in Post Offices where most people would see them. Additionally, the website for Corio Generation references Sceirdre Rocks Wind Farm but has no further relevant information than the general location proposed and the projected total wind farm power of 450MW.
- 3) Why is the proposed survey site in Application FS007161 for 60 boreholes when the developer [Fuinneamh Sceirde Teoranta (FST)] and their managers (Corio Generation) have promised residents that there will be a maximum of 25-30 wind turbines installed? What is the justification for such a large survey area?
- 4) Is it acceptable to be developing this proposal for a 30 turbine / 450 MW wind farm on the basis of mega wind turbines that are currently only at experimental stage? There are no wind turbines with 15MW output commercially available. Is the larger survey area because Corio Generation do not expect to meet this extremely optimistic output per turbine and therefore will need (many) more smaller turbines?
- 5) Is it appropriate to place such large machinery less than 5km from key cultural and natural heritage sites such as the 6th century church on Oilean MhicDaraand Oilean Masún. What impact will the turbines have on hugely important community events such as Feile Mhic Dara?
- 6) Is the government risking damage to one of Ireland's most pristine coastal environments if the proposed Sceirde Rocks Wind Farm is allowed? As the application states, the survey area is not subject to high levels off boat traffic. The fishermen based in this area generally have boats of less than 12m. There is no significant industrial activity in this area. As a result, the water, air and shoreline are clear of pollution. The Mace Head Weather Station is located here for this reason and consistently reports the cleanest air qualities in Europe. Mace Head Weather Station is one of 6 important international weather stations supplying crucial data in global research of climate change. Mace Head station "has been measuring greenhouse gases since 1978 under the Advanced Global Atmospheric Gases Experiment (AGAGE). AGAGE is part of the powerful global observing system that is measuring greenhouse gases in the earth's atmosphere" (RTE News, 10/03/2020). If the proposed Sceirde Rocks Wind Farm is allowed to proceed, Mace Head Weather Station will have to move, as they have told us that air flow readings will be affected by the wind farm and air quality readings will be affected by the construction phase as well as by the finished wind farm itself due to continual atmospheric dispersal of anti-corrosion materials used on the turbines.
- 7) Is it true that this proposed survey poses no significant risk to the marine environment? Can the developers claims be trusted? For instance, CORIO/FST seems to contradict itself in Application FS007161, when claiming that the proposed 70m boreholes don't qualify as 'deep drilling' yet do qualify as 'deep boreholes'. On p. 6 of the Environmental Impact Assessment (EIA), FST says that the proposed boreholes of 70m are not defined as 'deep drilling' because they are not related to an "extractive industry". This seems a purely semantic definition based

on the premise that deep drilling is defined solely when related to an extractive industry - not by the actual depth of the hole that is drilled. The application proposes using very large CPT Units (20-25 tonnes) because the drilling depth is up to 50m - which they say qualifies as 'deep' (FST EIA p. 18) while also saying that 70m is not deep enough' to qualify as 'deep drilling'. This seems frankly contradictory. As the EIA illustrates at length, the proposed boreholes are not as intrusive as a 'well'. However, a 70m borehole is highly intrusive to the marine environment & marine life. Application FS007161 also seeks permission to leave these 20-25 tonne CPT units on the seafloor beside the boreholes if needed, obviously resulting in severe damage to a significantly wider area of seabed around the boreholes. How can such significant seabed damage pose 'no significant risk to the environment' of the nursery/ spawning grounds in the area, as the EIA claims? Wind farm developers seeking to drill deep boreholes should be required to provide the same level of protective measures to the marine environment and marine life as those required by 'deep drilling'.

- Is the Irish government doing all it can to protect marine mammals? If the government allows Application FS007161 to proceed, it will show blatant disregard for best practise in preserving marine mammal health in Irish waters. During previous survey works by FST, a dead Harbour Porpoise was found on Trá Mhór and two dead seals were found, one on Trá Mhór and one on the Mynish Bay side of the island. A baby seal was also found on Trá Mhór but it made its way back to sea. For this second more intrusive survey, Sceirde Rocks Foreshore Application FS007161 Table 4.9 lists the decibel levels from impulsive noise sources for SBP & USBL. The levels listed are within 180dB - 240 dB re1mPa - a "scale (which) is roughly equivalent in air to noise levels experienced at a rock concert up to sound levels that can cause organ rupture" (p. 5, IWDG Offshore Wind arm Policy Document). This second foreshore application FS007161 reports protection procedures for marine mammals which are limited to slow starts and an MMO on board during daylight hours with binoculars. Such minimal marine mammal protection procedures are quite outdated and dangerously insufficient, according to the Irish Whale and Dolphin Group (IWDG) in their Offshore Wind Farm Policy Document (https://iwdg.ie/cms_files/ wp-content/uploads/2020/12/IWDG-Offshore-Windfarm-Policy-Document.pdf). In this document, the IWDG issues 25 recommendations on updated marine mammal protection procedures for offshore wind farm companies. Amongst them, IWDG strongly recommends that wind farm companies use Passive Acoustic Monitoring (PAM) to monitor and track cetacean movement in the areas of their survey and installation operations. IWDG recommends the use of Acoustic Deterrent Devices. IWDG also recommend that "Noise levels should be actively monitored during static operations such as pile driving, and should apply the most up to date TTS levels in noise emission monitoring. As per best practice in Germany and other jurisdictions, where noise levels exceed control levels, operations must cease until lower noise levels can be achieved. Noise mitigation measures such as coffer dams, bubble curtains and other Noise Abatement Systems (NAS) should be implemented where appropriate to reduce noise emitted into the environment, taking into account the depth, current, seabed and environmental conditions of the site" (p. 6, IWDG Offshore Wind Farm Policy Doc.). The Irish government should require all wind farm developers to abide by the marine mammal protection recommendations of the IWDG. If the Irish Government is sincere in its claims of protecting marine mammals, Application FS007161 should be denied.
- 9) Why have FST and Corio Generation not been forthcoming with residents about the visual impact of the proposed Sceirde Rocks Wind Farm? The Sceirde Rocks Wind Farm will be the most significant change ever experienced in the Connemara coastal environment and landscape. To generate the proposed 15MW output, the individual turbines will have to be massive [The Danish wind turbine manufacturer Vestas Wind Systems is developing such turbines: the giant V236-15 MW turbine, reaching a rotor tip blade height of 280 metres. These turbines are 2.3 times the height of the Dublin spire and nearly as tall as the Eiffel Tower in Paris (300 m)]. 15MW turbines are much larger than any wind turbines currently operating in Ireland [the largest wind turbines in Ireland are currently being installed at Arrderroo, a relatively isolated site in Co. Galway not easily visible or audible to local residents/tourists due to the contour of hills in the area. 7 of the 58 turbines in Arrderroo are Nordex N149/5.X (5MW) with hub heights of 159 metres and rotor blade tip heights of 240 metres.]. As yet, there has been no visual impact statement, image or drawing offered to the communities most affected by the proposed wind farm. Despite having the measurements/coordinates necessary for detailed marine surveys, Corio/FST have not produced scale drawings of their proposed wind farm

which would allow residents to understand the visual impact in their areas. This is not good enough.

10) If the proposed Sceirde Rocks Wind Farm is permitted to proceed, is the government securing the best technology/solution for the area? Ireland's coastline in general, and the Wild Atlantic Way in particular, are world famous for their wild beauty. Why is the government endangering Ireland's priceless coastal beauty by considering large fixed bottom nearshore wind farms? Fixed offshore wind farms so close to shore provide less power and more severe visual impact to residents than floating wind turbines located further offshore (https:// cdn.naturalresources.wales/media/689503/eng-evidence-report-315-seascape-and-visualsensitivity-to-offshore-wind-farms-in-wales.pdf). Because of their enormous visual impact, no other EU country will allow large wind turbines within 22km of their shoreline (https:// www.bluehorizon.ie/#proposal). There are several floating wind farms being planned at least 22km offshore for the east and south of Ireland. Why not require floating wind farms at least 22km offshore on this pristine coastline of the Wild Atlantic Way? As an example of the visual impact of large nearshore wind farms, I include a photo of Lincs Offshore Wind Farm (Lincolnshire, UK). As an indication of scale, Lincs Offshore Wind Farm is located 8km from shore, it's turbines are 170m tall. Application FS007161 states that Sceirdre Rocks Wind Farm will be closer to shore at 5km distance and it's turbines will be at least 280m tall.



Mat Fascione / Lincs Offshore Wind Farm / CC BY-SA 2.0

Regards,

Carna, Co. Galway

Mobile: @yahoo.com

From: @gmail.com>

Sent: Monday 27 February 2023 10:44

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks

Offshore Wind Farm

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A chara,

I am a resident of Oileán Muighinis and I am writing to state my objections to the award of foreshore licence FS007161 to Fuinneamh Sceirde Teoranta for site investigations for the proposed Sceirde Rocks Offshore Wind Farm.

- As reported in the Sunday Business Post on 26 February 2023 (Government U-turn 'puts 80 per cent of offshore wind projects at risk' | Business Post), the Department of the Environment, Climate, and Communications (DECC) has confirmed that there will be a centralised scheme for offshore wind energy projects "confined to two sites, one off the south coast and one off the south-east coast".
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- The 'Policy Support' document does not reference the European Union strategy "An EU Strategy to harness the potential of offshore renewable energy for a climate neutral future" (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0741&from=EN)
- The Environmental Assessment and EIA Screening Report does not demonstrate how the Climate Action Plan 2023 requirement for the "development of offshore renewable energy to progress at pace alongside the conservation, protection, and recovery of marine biodiversity" will be met. Mitigation measures alone are not sufficient to meet the requirement for conservation, protection, and recovery of marine biodiversity as part of offshore renewable energy development.
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- The Environmental Assessment and EIA Screening Report has not considered the impact of the survey works on the marine environment holistically, particularly on the basis of the food web. There is no mention in the report of the important seagrass and kelp forests in the survey area.
- The Environmental Assessment and EIA Screening Report has not considered the potential impact of the survey works on the atmospheric research station at Mace

- Head. The station is of international importance: <u>How a Galway weather station keeps track of climate change (rte.ie)</u>.
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- The Environmental Assessment and EIA Screening Report concludes that "the proposed activities will have no likely significant effects on the identified environmental receptors". It is impossible for the scale of survey works proposed to have no significant effects on the identified environmental receptors. This conclusion must surely call into question the validity of the Environmental Assessment and EIA Screening that has been carried out. It is also noted that an update to Schedule 5, Parts 1 and 2, of the Planning and Development Regulations 2001 is required to include offshore wind farms as a type of scheme that requires an EIA.
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- There has been very limited effort made to inform and consult with the local community regarding the foreshore licence application and the proposed survey works. Leaving the drawings in the garda station which can only be accessed by appointment is entirely insufficient. There are no posters up in key places such as the post office informing the local community about the foreshore licence application and how they can access information on it. Given the scale of the surveys proposed, as well as the scale of the proposed wind farm, it is essential that the local community who will be affected by this are consulted with and provided with information on the project.
- The Irish Government has committed to expand Ireland's Marine Protected Areas (MPAs) to cover 30% of Ireland's marine area by 2030 (having failed to meet an earlier 10% target) https://www.gov.ie/en/press-release/22f3a-government-takes-next-step-towards-marine-protected-areas-forming-30-of-irelands-maritime-area/. Fair Seas have published a report identifying areas of interest for Marine Protected Area designation in Irish Waters https://fairseas.ie/wp-content/uploads/2022/07/FS_full_report_pages.pdf. The report identifies an 'area of

- interest' incorporating Galway Bay and Islands which incorporates the area proposed for the Sceirde Rocks windfarm. The report notes the importance of the area in terms of cetaceans, commercial fishing, seabirds, and seabed features of conservation importance.
- A report on RTÉ Radio 1 on 14 February from a wind energy conference (https://podcasts.apple.com/ie/podcast/drivetime/id203094311?i=1000599615595) stated that wind farms off the west coast of Ireland will be floating turbines and will be up to 30km offshore and they won't be visible from land. It was stated that this was preferred as anything else would not survive in the waters off the west coast.
- Fuinneamh Sceirde Teoranta is owned by Macquarie's Green Investment Group (International investment bank Macquarie buys Irish offshore wind farm development (irishexaminer.com)) which has set up Corio Generation to manage its wind energy projects. Macquarie Group has a poor track record in terms of financial management, maintenance of infrastructure, and protection of the environment. Whilst Thames Water was under the ownership of Macquarie Bank there were significant environmental and financial management issues: How Macquarie bank left Thames
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"The identification, assessment and management of ESG (Environmental, Social and Governance) risks is core to GIG's principles and policies and to the Green Governance Framework. We encourage GIG to consider enhanced disclosure of such risks and its risk management framework. This should include the methods to assess and mitigate risk, and to realise opportunities."

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Given the scale of the risk involved – drilling 60 no boreholes into the seabed in an important marine area cannot be without impact – is this really the type of actor we wish to have involved? How can any of the documents associated with the foreshore licence application be taken at face value if the independent trustees tasked with ensuring that GIG delivers truly impactful and effective green infrastructure projects are highlighting a lack of transparency across multiple key areas of GIG's work?

Le meas,

From: @yahoo.co.uk>

Sent: Monday 27 February 2023 11:38

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks

Offshore Wind Farm

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- The 'Policy Support' document provided as part of the foreshore licence application makes no reference to the Climate Action Plan 2023
- The 'Policy Support' document does not reference the European Union strategy "An
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Le meas,

Objection to Foreshore applications FS007161 and FS007543 by Fuinneamh Sceirde

Teoranta – Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm and

Export Cable Corridor by Galway & Aran Fisherman's Co-operative

1. Galway & Aran Fisherman's Co-operative

Galway & Aran Fishermen's Co-operative was founded in 1974 and initially operated out of Galway Harbour. In 1979, operations were transferred to Ros a Mhíl, and all facilities for the operation and administration of the co-operative have been based there since 1982.

Since its inception, the co-operative has been engaged in the selling and marketing of members' landings, mainly by public auction, but also by contract. The collective purchase and payment of its members' supplies are necessary for the operation of their vessels, e.g. diesel, lubricating oils, provisions, ice, etc.

The co-operative consists of a fleet of eleven fishing vessels as well as a number of smaller fishing vessels.

The co-operative sells mainly whitefish, shellfish and a small amount of pelagic fish, mainly sold through the auction house it manages in a new modern building located close to the Harbourmasters office.

The co-operative employs eight staff. Turnover in 2021 was €8,499,766, with 2,936 tonnes of fish landed at Ros a Mhíl.

The co-operative is the sales agent for a number of commercial fishing vessels that fish the Aran Grounds for the Norway lobster, (Nephrops norvegicus), throughout the year and have done so for the past 50 years.

The turnover of members of Galway & Aran Fisherman's co-operative from catches off the Aran Grounds over the last number of years is;

2016 €1,842,390.00

2017 €1,838,727.00

2019 €1,295,974.00

A comprehensive survey of the amount of Nephrops located in the Aran Grounds is contained in Appendix 1

2. Norwegian Lobster (Nephrops norvegicus)

Nephrops, is the second most valuable commercial species landed from Irish waters. They are important ecosystem engineers that play a critical role in maintaining the health and stability of benthic ecosystems. They spawn on seabed's and therefore are highly vulnerable to disturbance. Nephrops are found at a depth range from 20 to 800m on muddy bottoms in which they dig their burrows. Spawning for Nephrops is highly dependent on sediment type, with a preference for sediments composed of fine cohesive mud.

Nephrops are common around the Irish coast occurring in geographically distinct sandy/muddy areas where the sediment is suitable for them to construct their burrows. The Nephrops fishery in ICES sub-area 7 is extremely valuable with Irish landings in 2019 worth around €31 million at first sale. The Nephrops fishery 'at the back of the Aran Islands' can be considered the mainstay of the Ros a Mhíl fleet. Estimated landings of 188 t in 2020 were worth approximately €1 million at first sale. Without this Nephrops fishery, the majority of vessels in the fleet would cease being economically viable. Given these socio-economic realities good scientific information on stock status and exploitation rates are required to inform sustainable management of this resource.

The Foreshore License area lies within the spawning grounds for Nephrops which spawn all year-round.

3. Fishing grounds and location of site investigations, surveys and cables

The fishing grounds lie west of the Foreshore License Area and overlap with the southern part of the route corridor running south-east toward Liscannor Bay. The fishing grounds at the back of the Aran islands is a rich Nephrops fishery where landings for the local fleet have well exceeded a million euro on an annual basis and is the mainstay of the smaller local fleet. The fishing grounds off Spiddal are fished regularly by some of the smaller vessels in the fleet as well.

The location of the Nephrops burrows and the proposed survey and cable locations are illustrated in the pictures located in Appendix 2

¹ https://www.afbini.gov.uk/sites/afbini.gov.uk/files/publications/FAEB%20fact%20sheets%20NEPHROPS.pdf

4. Negative impacts of site investigations and surveys on Nephrops

The surveys proposed in the Applicant's Environmental Assessment and Environmental Assessment Screening Report are comprised of a number of invasive methods. These include;

- (i) A Sub Bottom Profiling (SBP) system used to determine the stratigraphy across the site and quantify the variability in the lateral and vertical extents to a depth of at least 50m below seabed.
- (ii) An Ultra High Resolution Seismic (UHRS) system is optimised to achieve a subbed penetration depth focusing on the depth range of 10 1000 m below seafloor.
- (iii) Boreholes will be made which provide geotechnical data to aid with preliminary engineering support for horizontal direction drilling design at landfall locations.
- (iv) Up to nine boreholes will be required using Cable Percussive Sampling and/or Rotary Coring techniques (depth of borehole will not exceed 70m)

Nephrops reside within these depth ranges and will be extremely vulnerable to the disturbances caused from the aforementioned activities. Studies have shown that marine sonar surveying can cause physical damage to the burrows and habitats of Nephrops. The intense sound waves from sonar equipment can displace sediment, destabilise burrows, and cause harm to crustaceans that are unable to escape in time. In addition, the noise pollution created by sonar surveying can disrupt the feeding, mating, and communication patterns of marine animals, leading to stress and decreased reproductive success. This can have long-term impacts on the health and sustainability of the entire ecosystem.

5. Negative impacts of electrical cables on Nephrops

The noise generated during the cable-laying process can disturb the Nephrops behaviour, causing them to abandon their burrows or reduce their activity. The installation of high-capacity electrical cables can alter the physical and chemical conditions of the Nephrops habitat, making it unsuitable for their survival. Studies have shown that electromagnetic fields created by the cables which transport energy from the offshore wind farm have debilitating effects on Nephrops and can lead to Nephrops larvae being three times more likely to grow deformed - with bent tail sections being the most common. Thus, even if stock is temporarily affected, it could have long lasting effects later down the line. Such deformities lead to the Nephrops inability to swim and therefore inability to surface, which is a necessity in order for

them to feed and thrive. Tests have been carried out to check swimming ability of Nephrops exposed to electromagnetic fields and they were found to be three times more likely to fail the test. The proposed cable corridor running behind the islands of Fuinneamh Sceirde Teo runs directly through the Aran Nephrops grounds.

6. Summary

It is clear that proposed surveys and cable infrastructure have the capacity to wreck productive fishing grounds and are a real threat to the sustainability of the stock of Nephrops. Fishermen are now threatened with the loss of their legitimate business and the lack of consultation from the company is astonishing, particularly due to the inevitable negative effects such activities would have on their right to earn a livelihood under the Irish Constitution and European Conventions. Given that Nephrops is a rather sedentary species with specific habitat requirements, populations are unable to shift to other areas and will inevitably be negatively affected. We strongly believe that consultation with the Applicant needs to happen before a license is approved for either of these cable corridors as it will without doubt have a detrimental effect on the earnings of the local fishermen.

APPENDIX 1

The following tables details the summary statistics for the number of burrows in the Galway Bay Nephrops grounds from 2002-2021.

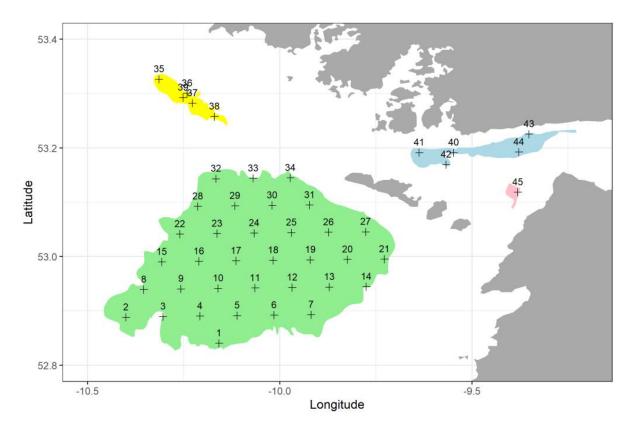
| Year | Ground | Number of stations | Area (km²) | Raised abundance estimate (million burrows) |
|------|------------|--------------------|------------|---|
| 2002 | Galway Bay | 7 | 78.966 | 93.1 |
| 2003 | Galway Bay | 3 | 78.966 | 102.6 |
| 2004 | Galway Bay | 8 | 78.966 | 92.2 |
| 2005 | Galway Bay | 4 | 78.966 | 103 |
| 2006 | Galway Bay | 3 | 78.966 | 58.8 |
| 2007 | Galway Bay | 5 | 78.966 | 71.8 |
| 2008 | Galway Bay | 5 | 78.966 | 31.6 |
| 2009 | Galway Bay | 8 | 78.966 | 56.3 |
| 2010 | Galway Bay | 10 | 78.966 | 97.6 |
| 2011 | Galway Bay | 6 | 78.966 | 43.2 |
| 2012 | Galway Bay | 4 | 78.966 | 50.9 |
| 2013 | Galway Bay | 5 | 78.966 | 29.6 |
| 2014 | Galway Bay | 3 | 78.966 | 39.8 |
| 2015 | Galway Bay | 5 | 78.966 | 55.8 |
| 2016 | Galway Bay | 7 | 78.966 | 25.1 |
| 2017 | Galway Bay | 5 | 78.966 | 15.8 |
| 2018 | Galway Bay | 5 | 78.966 | 32.5 |
| 2019 | Galway Bay | 5 | 78.966 | 22.8 |
| 2020 | Galway Bay | 5 | 78.966 | 27.2 |
| 2021 | Galway Bay | 5 | 78.966 | 11.5 |

The following table details the summary statistics for the number of burrows in the Slyne Head Nephrops grounds from 2002-2021.

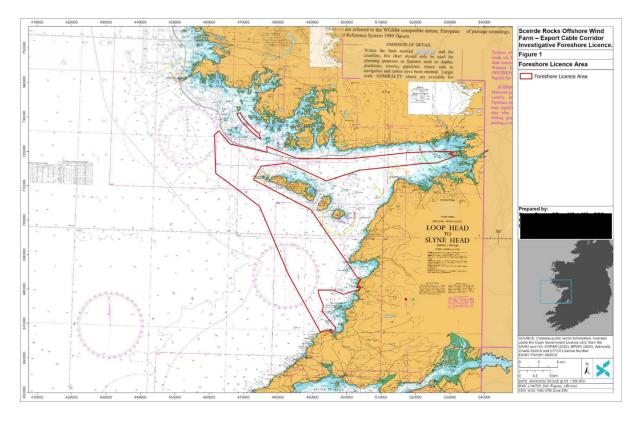
| Year | Ground | Number of stations | Area (km²) | Raised abundance estimate (million burrows) |
|------|------------|--------------------|------------|---|
| 2002 | Slyne Head | 5 | 39.146 | 29.8 |
| 2003 | Slyne Head | 0 | 39.146 | 25.3 |
| 2004 | Slyne Head | 3 | 39.146 | 20.8 |
| 2005 | Slyne Head | 3 | 39.146 | 17.4 |
| 2006 | Slyne Head | 3 | 39.146 | 11.8 |
| 2007 | Slyne Head | 4 | 39.146 | 19.8 |
| 2008 | Slyne Head | 0 | 39.146 | 16 |
| 2009 | Slyne Head | 6 | 39.146 | 12.2 |
| 2010 | Slyne Head | 7 | 39.146 | 28.7 |
| 2011 | Slyne Head | 7 | 39.146 | 20 |
| 2012 | Slyne Head | 3 | 39.146 | 20.5 |
| 2013 | Slyne Head | 4 | 39.146 | 21.1 |
| 2014 | Slyne Head | 4 | 39.146 | 11 |
| 2015 | Slyne Head | 5 | 39.146 | 19.6 |
| 2016 | Slyne Head | 4 | 39.146 | 10.8 |
| 2017 | Slyne Head | 4 | 39.146 | 10.7 |
| 2018 | Slyne Head | 5 | 39.146 | 33.0 |
| 2019 | Slyne Head | 5 | 39.146 | 11.5 |
| 2020 | Slyne Head | 5 | 39.146 | 7.4 |
| 2021 | Slyne Head | 5 | 39.146 | 9.1 |

APPENDIX 2

The following picture illustrates the location of the stations surveying Nephrops in 2021 in the Aran Grounds (green), Slyne Head (yellow), Galway Bay (blue) and Zero grounds (red).



The following picture is extracted from the Environmental Assessment and EIA Screening Report of the Applicant and demonstrates that the proposed survey location and cable location traverses the Nephrops grounds located at the "Aran Grounds", Galway Bay and Slyne Head



References

Mikel Aristegui1, Jennifer Doyle, Gráinne Ryan, Ross Fitzgerald, Jonathan White, Sinead O'Brien, Dave Tully and Mairead Sullivan (2021). Aran, Galway Bay and Slyne Head Nephrops Grounds (FU17) 2021 UWTV Survey Report and catch scenarios for 2022

Agri-Food and Biosciences Institute (1991) Nephrops Norvegicus Fact Sheet



Foreshore Section,
Department of Housing, Local Government and Heritage,
Newtown Road,
Wexford. Co Wexford

February 24th 2023

2nd Public Consultation - FS007161 Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm

A chara,

My name is an Associate Professor in the School of Natural Sciences at the University of Galway. I have expertise in molecular biology, environmental science, remote sensing and am a physicist by training. I have been the principal investigator or co-investigator of environment relevant funding from the Environmental Protection Agency (EPA) and Science Foundation Ireland. Of particular mention is the EPA funded KelpRes project, which was the first funded initiative by a State agency to characterise the diversity and resilience of kelp ecosystems within the Irish foreshore area¹. I mention this because this is directly relevant to my submission as part of the 2nd Public Consultation, which I am doing here in a private capacity as a concerned Irish citizen.

I have carefully read the documentation detailing the planned site investigations and in particular the 'Natura Impact Statement' and the associated 'SCREENING FOR APPROPRIATE ASSESSMENT REPORT'. Despite the apparently thorough review of the potential impact of the proposed site investigations for this significant offshore area (141 km²) of south-west Connemara, I was concerned to see no formal assessment of the potential impact of the proposed works to the extensive macroalgal communities - specifically kelp - likely to be present in this extensive area, and in particular to the potential irreversible damage to the extended marine ecosystems that depend on on these 'anchor' marine communities. I was furthermore surprised to see no mention of the climate change and carbon impact assessment of these proposed works - nor indeed the subsequent construction and operation of these enormous facilities.

I would refer you and your colleagues to the Scottish Government's comprehensive assessment of the impact of the planned Pentland Floating Offshore Wind Farm², in particular *Environmental Impact Assessment Report, CHAPTER 20: CLIMATE CHANGE AND CARBON*³, which details the *'climate change and carbon impact assessment... during construction, operation and maintenance, and decommissioning'* of this 100 MW facility to be operated off Caithness, and using a fraction of the windmills proposed for the Sceirde Rocks development. This is complemented by a separate *Environmental Impact Assessment Report, CHAPTER 9: Benthic Ecology*⁴, where a thorough assessment of the proposed works on the vitality of the kelp beds in this location is implemented.

¹https://www.epa.ie/publications/research/water/research-413-the-diversity-and-resilience-of-kelp-ecosystems-in-ireland.php

²https://pentlandfloatingwind.com/

³https://marine.gov.scot/sites/default/files/chapter_20._climate_change_and_carbon.pdf

⁴https://marine.gov.scot/sites/default/files/chapter_9._benthic_ecology.pdf

These reports together explicitly assess the impact of the proposed Caithness development in the context of releasing existing sequestered carbon in the sedimentary environment, and the potential for damage to the local kelp bed ecosystem. Based on a thorough prior survey of the Pentland Floating Offshore Wind Farm site, they note the presence of such extensive kelp forest communities. Stating that these kelp beds are 'a key blue carbon habitat' and 'a high-value receptor and are assessed as being highly sensitive to changes in habitat', the report notes that the developers 'will endeavour to microsite around sensitive habitats, such as kelp beds, wherever possible, to minimise any disturbance or loss' and provide evidence-based basis for the regulatory authorities to proceed with its development.

No such due diligence exists for the Sceirde Rocks Offshore Wind Farm. No assessment of the impact of the planned works on already sequestered carbon in this enormous marine area is, so far as I an determine, is being proposed. No survey of the wider benthic ecology of the site is planned where the full extent of the presence and extent of the kelp beds within the wind farm zone can be determined, and so a formal assessment of the impact of the planned works on their vitality could be made, nor of the potential destruction of one of the most effective and entirely natural carbon sequestration resources we actually possess in abundance off the Irish coast.

Therefore I am writing to you to request that the Minister be mindful of this deficiency in the existing environmental assessments of the Sceirde Rocks Offshore Wind Farm to date. My concern is the potential irreparable damage that could happen to this marine environment, ecologically and also in terms of carbon sequestration. It is not beyond the bounds of possibility that the proposed facility could be exposed to legal jeopardy in the future on account of this without the sort of scrutiny one can see implemented by our neighbours in Scotland for the Pentland Floating Offshore Wind Farm.

Is mise le meas,



From: @gmail.com>

Sent: Monday 27 February 2023 21:05

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: Sceirde wind farm

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I would loke to object to the sceirde wind farn on the grounds of its close proximity to the shore and the sheer height and number of them they will completely destroy the natural unspoilt beauty of this area and also the affect that the drilling will have on the sea life in the area and the wild birds that come to nest and rear their young every year.i have fished and sailed these waters most of my life and this will mo longer be possoble for me or anyone else if these wind turbines are erected i cant understand why they wont put yhem far out to sea on floating platforms so as not to disturb the sea bed too much and not to disrupt the beautiful scenery in this area that is getting scarcer all the time.i know that we need green energy and im not against that but surely they can be moved further out to sea like in other countries and not on our doorsteps giving us a flickering evening light it is a large price to pay in my opinion

From: @yahoo.ie>

Sent: Monday 27 February 2023 21:07

To: Housing ForeShoreORE < foreshoreORE@housing.gov.ie>

Subject: Sceirde Windfarm Submission

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I am a resident of Muighinis Island and I am writing to state my objections to the award of foreshore licence FS007161 to Fuinneamh Sceirde Teoranta for site investigations for the proposed Sceirde Rocks Offshore Wind Farm.

As reported in the Sunday Business Post on 26 February 2023 (Government U-turn 'puts 80 per cent of offshore wind projects at risk' | Business Post), the Department of the Environment, Climate, and Communications (DECC) has confirmed that there will be a centralised scheme for offshore wind energy projects "confined to two sites, one off the south coast and one off the south-east coast".

The 'Policy Support' document provided as part of the foreshore licence application does not make reference to the Climate Action Plan 2023

The 'Policy Support' document does not reference the European Union strategy "An EU Strategy to harness the potential of offshore renewable energy for a climate neutral future" (https://eur-lex.europa.eu/legal-

content/EN/TXT/PDF/?uri=CELEX:52020DC0741&from=EN)

The Environmental Assessment and EIA Screening Report does not demonstrate how the Climate Action Plan 2023 requirement for the "development of offshore renewable energy to progress at pace alongside the conservation, protection, and recovery of marine biodiversity" will be met. Mitigation measures alone are not sufficient to meet the requirement for conservation, protection, and recovery of marine biodiversity as part of offshore renewable energy development.

The Environmental Assessment and EIA Screening Report has not assessed potential socioeconomic impacts of the survey works

The Environmental Assessment and EIA Screening Report has not considered the impact of the survey works on blue carbon sequestration

The Environmental Assessment and EIA Screening Report has not considered the impact of the survey works on the marine environment holistically, particularly on the basis of the food web. There is no mention in the report of the important seagrass and kelp forests in the survey area.

The Environmental Assessment and EIA Screening Report has not considered the potential impact of the survey works on the atmospheric research station at Mace Head. The station is of international importance: How a Galway weather station keeps track of climate change (rte.ie).

The Environmental Assessment and EIA Screening Report does not reference the Irish Whale and Dolphin Group (IWDG) policy paper on offshore wind: https://iwdg.ie/cms_files/wp-content/uploads/2020/12/IWDG-Offshore-Windfarm-Policy-Document.pdf

The Environmental Assessment and EIA Screening Report fails to note the conservation status of marine species. For example, the leatherback turtle is reported as vulnerable, with a

declining population, in the International Union for Conservation of Nature (IUCN) red list: Dermochelys coriacea (Leatherback Turtle) (iucnredlist.org).

The Environmental Assessment and EIA Screening Report has not considered the potential impact of the survey works on seabirds. The Birdwatch Ireland Birds of Conservation Concern in Ireland 2020-2026 (Red and Amber Lists of Birds of Conservation Concern in Ireland (BoCCI4) 2020-2026 - BirdWatch Ireland) includes a number of birds present in the area that may be impacted by the survey works.

The Environmental Assessment and EIA Screening Report has not considered the potential impact of the survey works on key cultural and natural heritage sites such as the 6th century church on Oilean MhicDara.

The Environmental Assessment and EIA Screening Report concludes that "the proposed activities will have no likely significant effects on the identified environmental receptors". It is impossible for the scale of survey works proposed to have no significant effects on the identified environmental receptors. This conclusion must surely call into question the validity of the Environmental Assessment and EIA Screening that has been carried out. It is also noted that an update to Schedule 5, Parts 1 and 2, of the Planning and Development Regulations 2001 is required to include offshore wind farms as a type of scheme that requires an EIA.

The 'Schedule of Activities' states that "A foreshore license with a timeline of 5 years is being requested to allow phases of survey activity". It is stated that the phasing will consist of preliminary investigation for general ground conditions and potential hazard assessment, main investigation for specific ground conditions, and infill survey covering additional locations or to investigate newly identified hazards. However, the schedule of activities appears to provide details only for the preliminary investigation.

There has been very limited effort made to inform and consult with the local community regarding the foreshore licence application and the proposed survey works. Leaving the drawings in the garda station – which can only be accessed by appointment – is entirely insufficient. There are no posters up in key places such as the post office informing the local community about the foreshore licence application and how they can access information on it. Given the scale of the surveys proposed, as well as the scale of the proposed wind farm, it is essential that the local community who will be affected by this are consulted with and provided with information on the project.

The Irish Government has committed to expand Ireland's Marine Protected Areas (MPAs) to cover 30% of Ireland's marine area by 2030 (having failed to meet an earlier 10% target) - https://www.gov.ie/en/press-release/22f3a-government-takes-next-step-towards-marine-protected-areas-forming-30-of-irelands-maritime-area/. Fair Seas have published a report identifying areas of interest for Marine Protected Area designation in Irish Waters - https://fairseas.ie/wp-content/uploads/2022/07/FS full report pages.pdf. The report identifies an 'area of interest' incorporating Galway Bay and Islands which incorporates the area proposed for the Sceirde Rocks windfarm. The report notes the importance of the area in terms of cetaceans, commercial fishing, seabirds, and seabed features of conservation importance.

A report on RTÉ Radio 1 on 14 February from a wind energy conference (https://podcasts.apple.com/ie/podcast/drivetime/id203094311?i=1000599615595) stated that wind farms off the west coast of Ireland will be floating turbines and will be up to 30km offshore and they won't be visible from land. It was stated that this was preferred as anything else would not survive in the waters off the west coast.

Fuinneamh Sceirde Teoranta is owned by Macquarie's Green Investment Group (International investment bank Macquarie buys Irish offshore wind farm development (irishexaminer.com)) which has set up Corio Generation to manage its wind energy projects.

Macquarie Group has a poor track record in terms of financial management, maintenance of infrastructure, and protection of the environment. Whilst Thames Water was under the ownership of Macquarie Bank there were significant environmental and financial management issues: How Macquarie bank left Thames Water with extra £2bn debt - BBC News. The company were prosecuted for polluting the Thames and other rivers and the Judge noted that there had been "inadequate investment, diabolical maintenance and poor management". The pollution by the company was considered to be "reckless" and "borderline deliberate" and the Judge further stated that "knowledge of what was going on went very high indeed".

Macquarie's Green Investment Group (GIG) includes independent trustees, as part of the sale to Macquarie group by the UK Government. In their most recent annual letter (Letter from the GPC (greeninvestmentgroup.com)) these independent trustees highlighted concerns with regard to GIG's risk and opportunity management:

"The identification, assessment and management of ESG (Environmental, Social and Governance) risks is core to GIG's principles and policies and to the Green Governance Framework. We encourage GIG to consider enhanced disclosure of such risks and its risk management framework. This should include the methods to assess and mitigate risk, and to realise opportunities."

The trustees also note concerns related to disclosure:

"Disclosure is an area where, in our view, GIG is now at risk of falling significantly behind peers and leading practice. To maintain credible global leadership and influence within green investment policy, process and practice, GIG should aspire to leading edge disclosure practices. As noted above, there are several areas where disclosure could be improved. These include risk, stakeholder engagement and the metrics and targets associated with GIG's commitments to net zero, among others."

Given the scale of the risk involved – drilling 60 no boreholes into the seabed in an important marine area cannot be without impact – is this really the type of actor we wish to have involved? How can any of the documents associated with the foreshore licence application be taken at face value if the independent trustees tasked with ensuring that GIG delivers truly impactful and effective green infrastructure projects are highlighting a lack of transparency across multiple key areas of GIG's work?

Yours Sincerely,



Co. Galway.

Sent from Yahoo Mail on Android

From: @gmail.com>

Sent: Monday 27 February 2023 21:20

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: Sceirde wind farm

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I would like to strongly object to the wind farm being put so close to the shore and in plain view of so many dwellings and buisinesses and also the affect that these turbines will have on the wildlife and fish in the area i have fished and sailed in these waters most of my life and find it hard to believe that such a big turbines could even be considered so close to the shore and in an area of unspoilt beauty in which it is so hard to get planning permission for most things.if these wind farms could be put out at sea far out of view like they do in most countries there would be no problem im sure and on floating platforms so as not to have to be drilling and damaging the fragile natural habitat of our already dwindling fish stocks.these will also have a detrimental affect on tourism in the area which so many people depend on every season please consider all i have mentioned yours sincerely

From: .com>

Sent: Monday 27 February 2023 22:28

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: Objection to proposed wind farm off the coast of the West of Ireland

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I was shocked and saddened to see the map of the proposed development of wind farm off the coast of Carna.

The most beautiful unspoiled part of Galway – we seem to have destroyed so much of our natural resources for profit and are not thinking of the future and what we should leave behind for the next generation

We are all aware that we need other options for energy but not here or so close to the coast. For many years I have been sending guests to Connemara and they are blown away by Carna – quietness, the water, the silence, The way they expect Ireland to be.....

They are not coming for fast roadways, green energy, big houses, or busy cities or towns.

This is not progress this is all about money..

The planners need to take a drive to Carna – there are other options & ways. More important that you look at public transport & electric cars We live near a M16 and it roars day & night – is this progress I don't think so

Ireland needs this space to left wild & beautiful for generations to come see & discover

From: @gmail.com>

Sent: Monday 27 February 2023 23:38

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject:

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To whom it concerns,

I would like to object to the scale and positioning of the proposed of shore wind farm at Sceirde rocks Connamara.

While I do think wind power is the way forward ,it must not be at the cost to natural beauty . I think that this project needs to be pushed further out to sea as it will be totally visible from the coast in areas of outstanding natural beauty.

Kind regards,

Roundstone Co Galway.

From: @gmail.com> Sent: Monday 27 February 2023 23:48

To: Housing ForeShoreORE <foreshoreORE@housing.gov.ie>

Subject: Proposed Sceirde Rocks Offshore Wind Farm

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Concerning the above proposal, I have several concerns regarding the siting of the proposed development. The size and number of proposed turbines, so close to an area recognised as being one of the cleanest environments in the country for air quality and clean seabed, could pose a threat to this status.

A development such as this has repercussions far beyond the lifespan of the wind farm. The seabed and surrounding environment

repercussions far beyond the lifespan of the wind farm. The seabed and surrounding environment would be altered irreversibly with possibly unforeseen implications in the future.

The need for such generating capacity to meet our commitments is justifiably a priority but, according to the company profile, there is a choice of offshore wind farm type; A permanent site with seabed foundations and boreholes or a floating offshore wind farm. What are the reasons why the floating option has not been put forward?

This is quoted as the largest infrastructural project that the region has seen. We have seen the devastating effect of fast track planning with the Derrybrien farm. All avenues need to be investigated and documented in full and in detail with regard to future impact on environment and sensitive area.

Technology is moving at an unprecedented pace. Green energy options will increase apace with the need for sustainable options and emissions targets.

This is a decision that

should not be made for profit or short term requirement but one that will be right for the environment, the community and the country.

Sent from my iPhone