



Rialtas na hÉireann
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Irish Offshore Strategic Environmental Assessment 6 Consultation Report

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Prepared by the Department of the Environment, Climate and
Communications
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1 Introduction

This consultation report has been prepared for the Department of the Environment, Climate and Communications (DECC) by Intertek Energy and Water Consultancy (Intertek).

This provides a summary of all consultation undertaken on the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of the 'Plan for assessment of applications for Petroleum Exploration and Production Authorisations in Irish Offshore Waters' for the period to 2030 (DECC, 2022).

1.1 Background

DECC is preparing a 'Plan for the assessment of applications for Petroleum Exploration and Production Authorisations in Irish Offshore Waters for the period to 2030' ("the Plan"). The Plan is being considered in the context of both SEA and AA, with the entire project referred to as Irish Offshore Strategic Environmental Assessment 6 ('IOSEA6'). This Plan will replace the existing Plan (which was the subject of IOSEA5) and will incorporate recent policy and legislative developments. It will set out the approach to the granting of petroleum authorisations in Irish waters in the period to 2030, and the consenting of the possible offshore activities (seismic surveys and the drilling of wells) that could take place under an authorisation, subject to Ministerial consent.

A key driver of the Plan is that the Climate Action and Low Carbon Development (Amendment) Act 2021 sets out a detailed plan to take decisive action to achieve a 51% reduction in overall greenhouse gas emission by 2030 and sets a path to reach net zero emissions no later 2050.

The purpose of the Plan is to provide a framework for the issuing of Petroleum Authorisations in Irish Offshore Waters. Key activities that could be undertaken under an authorisation include seismic surveys and the drilling of exploration, appraisal and production wells.

The Plan to be assessed under IOSEA6 will only grant petroleum (oil and gas) authorisations in areas currently under existing authorisations for petroleum activities to the west, south and south-east of Ireland. Offshore areas which are not currently subject to an authorisation will not be able to be licensed in the future.

The following objectives have been defined for IOSEA6:

1. To inform DECC of specific environmental considerations in petroleum activities taking place under both existing petroleum authorisations and any follow-on authorisations that may be granted during the lifetime of the 'Plan for Issue of Petroleum Exploration and Production Authorisations in Irish Offshore Waters for the Period to 2030', in line with current policy and legislation.
2. To provide petroleum authorisation holders an operational baseline against which they can conduct activities whilst ensuring the protection of the marine environment, in line with current best practice and lessons learned from previous IOSEAs.

As part of this process, a series of consultations had been organised as part of this project, as submissions were sought by selected stakeholders, as well as members of the public. This document presents an overview of the consultation process and the issues raised in the submissions received and how they have been treated before setting out the revisions made in light of the submissions received during the consultation process.

1.2 Consultation Process

Three separate consultations on varying stages of the draft plan and the associated SEA and AA Documents were held during IOSEA6.

- A draft outline of the Plan was provided to selected stakeholders along with the AA Screening Report, in order for the Department requested input from the required statutory bodies before making a Determination on whether a full AA was required.
- A draft version of the full Plan was provided to a wider list of stakeholders alongside the SEA Scoping Report, as the Department requested advice from the relevant bodies on further datasets or information that they recommended be incorporated into the SEA process.
- A draft version of the Final Plan, which incorporated the monitoring process and mitigation measures, was published to gov.ie and circulated to interested parties alongside the Environmental Report and Natura Impact Statement (NIS), with submissions invited from interested parties and the Public to comment on the draft Plan and associated documents.

Notification of the Public Consultation of the draft Policy Statement and associated documents was widely circulated by email to the consultees listed in Section 2.2 and was published on gov.ie on 28 November 2022 and the consultation occurred for a seven-week

period, with the deadline for submissions set at 13 January 2023. To increase awareness of this consultation taking place, the department also created posts on its social media platforms to increase awareness, along with a public notice being placed in the Irish Times on 02 December 2022. These notices included an invitation for submissions from all interested parties.

Across all three consultations, 40 submissions were received. They included submissions from Industry, Community Groups, Government Departments and Agencies and private individuals. Submissions from private individuals had personal information redacted before publication. DECC operates a convention for the publication of submissions received as part of a public consultation whereby submissions are classified as follows:

1. Industry Submissions: These are from businesses with a tangible financial interest in IOSEA6.
2. Group / Organisation Submissions: These are from other organisations like educational institutions, NGOs and Government Departments.
3. Individual Submissions: These are submissions made in an individual capacity.

Consultation on the NIS and ER resulted in two submissions were received from 'Industry', 13 submissions were received from 'Organisations', and two submissions were received from 'Individuals'. The adoption of this convention does not deny that any submission could reflect a vested interest or suggest that the interests of the three different categories are inherently different or opposed to one another.

The Department has carefully considered all the submissions and as a result has revised the draft Plan to incorporate appropriate modifications. This report will outline the submissions received and provides information on how the information was incorporated into the final version of the Plan, as well as the SEA and AA process.

2 Strategic Environmental Assessment Consultation

2.1 Consultees

Identifying consultees was an ongoing process during IOSEA6. A wide range of stakeholders have been consulted in the preparation of the SEA and AA.

2.1.1 Statutory Consultees

The statutory authorities for the plan were:

- Environmental Protection Agency (EPA);
- Department of Agriculture, Food and the Marine (DAFM);
- Department of the Environment, Climate and Communications (DECC);
- Department of Housing, Local Government and Heritage (DHLGH); and
- Local government – county and city councils.

2.1.2 Transboundary Statutory Regulators

- Isle of Man: Department of Environment, Food, and Agriculture
- Northern Ireland:
- Northern Ireland Environment Agency (NIEA)
- Department of Agriculture, Environment and Rural Affairs (DAERA)
- The Scottish Environment Protection Agency (SEPA)
- NatureScot
- Historic Environment Scotland
- Natural Resources Wales (NRW)
- Cadw (Welsh Environmental Service)
- Natural England
- Environment Agency
- Historic England

2.1.3 Irish non-statutory consultees relevant to and included in the IOSEA6 consultation.

- An Taisce
- Bird Watch Ireland
- Irish Sailing Association

- Bord Iascaigh Mhara (BIM)
- Commissioners of Irish Lights (CIL)
- Central Fisheries Board
- Failte Ireland
- Health and Safety Authority
- Irish Basking Shark Group
- Irish Offshore Operators' Association (IOOA)
- Irish Whale and Dolphin Group (IWDG)
- Irish Wildlife Trust
- Marine Institute (MI)
- National Parks and Wildlife Service (NPWS)
- Sea Fisheries Protection Authority
- The Heritage Council
- Irish Aviation Authority
- Commission for Regulation of Utilities (CRU)
- Irish Environmental Network
- Various Fisheries Producer Organisations
- Wind Energy Ireland

2.1.4 UK non-statutory consultees relevant to and included in the IOSEA6 consultation.

- Marine Management Organisation (MMO)
- Joint Nature Conservation Committee (JNCC)
- The Crown Estate
- Whale and Dolphin Conservation (WDC)
- ORCA Whale and Dolphin Group
- Department for Energy and Climate Change (UK)
- Centre for Environment, Fisheries and Aquaculture
- Royal Society for the Protection of Birds (RSPB)

2.2 Scoping Report Consultation

The SEA Scoping Report, which detailed the proposed structure of the SEA Environmental Report (ER) (Intertek, 2022a) was issued to key stakeholders and statutory authorities on 29th July 2022 for a six-week consultation period, which ended on 2nd September 2022.

2.2.1 Scoping Report Consultation Responses

Of the statutory and non-statutory consultees contacted, 11 scoping responses were received from;

- EPA;
- DECC / Geological Survey Ireland (GSI);
- DAFM;
- CRU;
- CIL;
- SEPA;
- NatureScot;
- Historic Environment Scotland;
- Natural England;
- JNCC; and
- Marine and Fisheries Division, DAERA NI.

Table 2-1 below summarises the relevant consultation responses received from the Scoping report consultation. The actions taken were addressed in the Environmental Report (Intertek, 2022b).

Table 2-1 Consultation feedback for Scoping Report

Consultee	Comment	Summary of Action Taken
CIL	<p>Reviewed this consultation and have no objections from a safety of navigation perspective.</p> <p>National Marine Planning Framework (NMPF) Ports, Harbours and Shipping Ch18: Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have:</p> <ul style="list-style-type: none"> - been informed by consultation at pre-application stage or earlier with the relevant port authority; - have carried out a navigational risk assessment including an analysis of maritime traffic in the area; and - have consulted Department of Transport, MSO and Commissioners of Irish Lights. Applicants must continue to engage parties identified in pre-application processes as appropriate during the decision-making process. <p>NMPF Ports, Harbours and Shipping Ch18: Irish Lights Risk Assessment processes can identify any increase in navigational risk and potential mitigation measures. Issues include:</p> <ul style="list-style-type: none"> - The protection of the use of the shortest routes to ports, thus the most economic route with the least carbon footprint. - Supporting the tourist, leisure and fishing sectors, promoting safety at sea, and encouraging safe development of coastal infrastructure and commercial activity, such as offshore exploration and renewable energy. <p>NMPF Safety at Sea Ch19: Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.</p>	The PPS review has been updated to note requirements of the NMPF in relation to navigation.
CRU - Commission for Regulation of Utilities	CRU remit for upstream (offshore and onshore) petroleum exploration/extraction, environmental role under the Petroleum Safety Act 2015 including major environmental incidents resulting from major accidents. Given the limited environmental remit as per these conditions CRU have no comments on the ongoing consultation.	Noted.

Consultee	Comment	Summary of Action Taken
DAFM - Department Agriculture, Food and the Marine and Marine Institute	<p>The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself.</p> <p>It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, we recommend consulting the fisheries Producer Organisations. Contact details for number of organisations provided.</p> <p>The list of consultees on page 36 of the Scoping Report includes the Federation of Irish Fishermen. This organisation is defunct, and instead we recommend consulting the fisheries Producer Organisations. These organisations are listed below:</p> <p>Killybegs Fishermen's Organisation Irish South and East Fish Producers Organisation Irish Fish Producers Organisation Clogherhead Co-op National Inshore Fisheries Forum Irish Fish Processors and Exporters Association Irish South and West Fish Producers Organisation Irish South And West Irish Islands Marine Resource Organisation</p>	<p>Impacts on commercial fishing activities is considered in the environmental assessment.</p> <p>Suggested fisheries Producer Organisations added to list of consultees on the ER.</p>
	<p>The IOSEA6 report is an excellent overview of fish, shellfish and fisheries in Irish waters. Number of small recommendations made for baseline section.</p> <p>Section C.8.9.1 and C.5.7.1 are not an accurate representation of the current overfishing situation and are based on non-official or not peer reviewed sources and should be removed or modified.</p>	<p>Section C.8.9.1 has been mortified, section C.5.7.1 has been removed.</p>
	<p>Section C.2.3: Few minor points like herring are misplaced in the demersal fish section, horse mackerel and boarfish are also important pelagic species in the area.</p>	<p>Section C.2.3 has been updated to include species mentioned and herring statement edited.</p>
	<p>Section C.8.1.1: While it is made clear in the figure legends for Figures C-36 to C-38 it could also be stated in the text that the maps represent fishing effort for >12m vessels.</p>	<p>A note has been made within section. C.8.1.1 regarding fishing vessels greater than 12m.</p>

Consultee	Comment	Summary of Action Taken
	Section C.8.9.1 is stated that “Ireland has a significant problem with overfishing” which is probably something that DAFM would contest. It is true to say that overfishing was a historical problem in the past in the IOSEA6 area significant progress has been made to end overfishing and bring down fishing mortality rates to sustainable levels. The latest ICES fisheries overview for the Celtic Seas (ICES, 2021) clearly shows declining levels of overfishing for many stocks and species groups especially since around 2000. The Marine Institute Stockbook also indicates that fishing pressure has declined on many stocks, and many are no longer considered overfished (Marine Institute, 2021).	This section has been updated as per the ICES and Marine Institute references.
	Section C.5.7.1: Similar comments to C.8.9.1, Bird Watch Report just re-quoting New Economics Foundation Reports	Section C5.7.1 has been removed, and sections C.8.9.1 has been updated.
	Section C.8.11 Table C-36: section identifies overviews of commercial fish distributions and the fisheries that exploit them as a key data gap. The VMS linked logbook information in the Atlas of commercial fisheries is available for the years 2019-2022 with a lag of around 1 year due to data transmission delays. So it is not a data gap per se the data is available from the Marine Institute but is just not published. Caveat is that VMS data is biased to species. Ground fish survey and other MI fisheries surveys are conducted annually (Nephrops UWTV and acoustic survey). Main data gap lack of species distributions models and up to date synthesis of knowledge on essential fish habitats.	The data gaps sections have been updated taking into account the consultation response
EPA	<p>This submission highlights some key environmental issues to consider in preparing the Plan and SEA.</p> <p>Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen Key Messages for Ireland. Delivering Ireland’s long term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies. The SOER2020 messages are also linked to a number of the UN’s Sustainable Development Goals, in particular Climate Action, Life on Land and Life below Water. Addressing and implementing these actions will be important in delivering environmental protection and promoting sustainable development in Ireland. In finalising the Plan and integrating the findings of the SEA into the Plan, the relevant recommendations, key issues and challenges described in the EPA’s SOER2020 should be taken into account.</p>	The State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 report has been reviewed in the preparation of this SEA.

Consultee	Comment	Summary of Action Taken
	<p>The integration of the SEA process into the Plan should reflect the overall objective of the SEA Directive “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes”.</p> <p>All recommendations from the SEA, including mitigation measures, should be integrated into the Plan. Fully integrating the findings and recommendations of the SEA into the Plan will be key to strengthening its overall positive commitments while ensuring that any significant adverse effects of implementing the Plan are mitigated. The SEA Environmental Report should include a chapter outlining how the recommendations and mitigation measures from the SEA, and any other environmental assessments, have been incorporated into the Plan. We recommend that, the SEA Environmental Report includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Plan policies/measures.</p> <p>SEA requires that significant environmental effects of implementing a plan are monitored in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action. The SEA environmental report must include a description of the measures envisaged concerning monitoring. The Plan should include a commitment to implement SEA-related environmental monitoring requirements and the associated reporting.</p> <p>The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any unforeseen environmental issues that may arise. The SEA Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring.</p> <p>The Plan should include a commitment to monitor the Plan over its lifetime to determine how well and effective the environmental-related objectives of the Plan are being met in implementing the Plan. The Plan should also take account of the SEA-related monitoring programme and associated reporting aspects also. We suggest including a separate section on ‘Monitoring, Implementation and Reporting’ in the Plan, setting out the provisions for monitoring (including SEA-related monitoring) and reporting considerations. It would be helpful also to specify the frequency of monitoring or periodic reviews of the</p>	<p>The SEA has helped define the limits of the Draft Plan and identify suitable mitigation to be considered at project level to minimise and avoid the potential effects on the environment.</p> <p>Section 5 of the ER presents the approach to monitoring. Monitoring will be undertaken at Project level and used to inform the effectiveness of the Plan.</p>

Consultee	Comment	Summary of Action Taken
	<p>Plan over its lifetime.</p> <p>There may be merits in aligning the periodic reviews of the Plan with existing cyclical reporting.</p> <p>The Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. To avoid duplication in data collection, the same indicators should be used for the plan-related and SEA-related monitoring where possible.</p>	
	We recommend including schematics in the SEA Environmental Report, showing the links and key inter-relationships between the Plan and other key relevant national, regional, sectoral and environmental plans/programmes (e.g., the National Marine Planning Framework, Offshore Renewable Energy Development Plan, Seafood Development Programme 2021-2027 etc.) and legislation.	The use of Schematics was considered in the preparation of the report but not implemented. Section 3 of the ER sets out the relevant Policies and Legislative Framework for the Plan.
	Appendix I provides info on next steps and available guidance and resources.	These guidance documents have been reviewed in the preparation of this ER.
	Scoping report should consider whether there is potential for likely significant effects perceived on neighbouring Member States. Additionally, we advise that consultation should be undertaken at a minimum with the relevant ministries/agencies in Northern Ireland and the UK. The relevant requirements of the SEA protocol ¹ under the ESPOO Convention should be taken into account, for any possible transboundary consultations with non-EU Member States.	We note that effects of the plan may impact transboundary waters. Transboundary consultation has been undertaken.
	<p>Section 3.4, it would be useful to consider the extent to which waste management associated with aspects such as drilling muds and other materials are considered in the SEA.</p> <p>Given the amount of seismic survey activity planned, a more comprehensive review of the MSFD Descriptor 11 (Underwater Noise) would be useful to consider.</p>	MSFD Descriptor 11 was considered in the environmental assessment.
	<p>Welcome that the scoping report acknowledges the "Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA)"</p> <p>Reasons for selecting the alternatives considered should include a description of how the</p>	This guidance was reviewed in preparation of alternative options for the Plan. Reasons for not selecting certain options are listed in Section 4.1.

Consultee	Comment	Summary of Action Taken
	<p>assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p> <p>Summary of alternative scenarios considered and the justification for selection of the preferred scenario/ combination of scenarios should also be provided.</p> <p>Suggest that the EPA Good Practice note for on SEA for the Energy Sector (EPA, 2021) may be useful to consider at this time also.</p>	<p>The guidance on good practice on SEA for the Energy Sector was also utilised.</p>
	<p>The EPA has published Guidance on SEA Statements and Monitoring, which should be considered in the preparation of the SEA statement.</p> <p>In addition, the DECC is required to publish a newspaper notice inviting submissions/observations from the public on both the Plan and the SEA environmental report. The SEA regulations refer to a public consultation period of not less than 4 weeks, however, given the national aspect of this Plan it is suggested that allowing a longer consultation period, 8-12 weeks, would be more appropriate.</p> <p>In accordance with Article 16 of the SEA Regulations DECC is required to publish a SEA Statement alongside the adopted Plan, summarising:</p> <ul style="list-style-type: none"> • how environmental considerations have been integrated into the Plan; • how the environmental report and consultation comments on it have been taken into account; <p>Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine • the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with (in the Environmental Report and the associated consultation); • the measures decided concerning monitoring. 	<p>The consultation period of 6 weeks is considered appropriate for the ER and Plan.</p> <p>An SEA statement will be produced upon adoption of the Plan.</p>
	<p>We note the environmental objectives set out in Table 6.1 – Draft SEA Objectives for the assessment of the Plan. With regards the Climatic Factors objective, there is merit in</p>	<p>The SEOs have been revised to take into account comments provided.</p>

Consultee	Comment	Summary of Action Taken
	<p>clarifying how the Plan will 'contribute to the delivery of the green economy'. Under the 'Economy and Material assets' topic, objective 5 (Protect and enhance existing infrastructure) could be amended to clarify the type of infrastructure covered, i.e. national/international and the various relevant sectoral infrastructure contained in the marine environment.</p> <p>The objective associated with the Water topic, could be amended to refer to supporting achievement of the objectives of the Marine Strategy Framework Directive.</p>	
	The Plan should identify any significant data and knowledge gaps, including commitments to help address these on a priority basis during the implementation phase of the Plan. This is with a view to strengthening the evidence base for future reviews and iterations of the Plan.	The ER includes data gaps in Section 3.5.
	The SEA Environmental Report should refer to the full range of effects and of the area likely to be affected. This assessment should consider the duration and frequency of effects as well as short, medium and long-term, cumulative and synergistic effects of the legislation.	The environmental assessment includes consideration of these effects.
	The geographical scope of the SEA is limited to the effects of the Plan within Ireland. The spatial coverage of the SEA should include both our coastal waters and offshore islands. The scoping report should consider whether there is potential for likely significant effects perceived on neighbouring Member States. Additionally, we advise that consultation should be undertaken at a minimum with the relevant ministries/agencies in Northern Ireland and the UK. The relevant requirements of the SEA protocol ¹ under the ESPOO Convention should be taken into account, for any possible transboundary consultations with non-EU Member States.	We note that effects of the plan may impact transboundary waters. Transboundary consultation has been undertaken.
	Following the completion of the public consultation on the SEA environmental report and the Plan, the final stages of the SEA process are to integrate and document the environmental considerations of the SEA environmental report into the Plan, as appropriate. The EPA has published Guidance on SEA Statements and Monitoring, which should be considered in the preparation of the SEA statement.	Noted.
	Appendix II sets out some additional plans and additional resources that may be useful to consider.	The PPS review has been updated to include PPS and legislation recommended.

Consultee	Comment	Summary of Action Taken
Geological Survey Ireland	<p>Geological Survey Ireland would encourage use of and reference to our datasets. This data can add to the content and robustness of the SEA process.</p> <p>Provided list of datasets.</p>	<p>Recommended datasets were reviewed and used to update the baseline data sections of the ER for relevant topic sections.</p>
	<p>Geological Survey Ireland have provided advice and information on particular topics which can add to the content and robustness of the SEA process.</p> <p>This advice includes:</p> <p>Marine and Coastal Unit - Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.</p> <p>Coastal Vulnerability index - Geological Survey Ireland is undertaking a new coastal vulnerability mapping initiative. Maps produced by this project will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea-level rise through the use of a Coastal Vulnerability Index (CVI).</p> <p>Geoheritage –</p> <p>Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts. County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer. There are numerous coastal and island County Geological Sites. We</p>	<p>All advice that has been recommended by the GSI has been taking into account within the ER.</p>

Consultee	Comment	Summary of Action Taken
	<p>would recommend consultation of the Geological Heritage viewer as there may be potential impacts on the integrity of current CGSs envisaged by potential offshore petroleum activities, (including associated onshore site works and cable/pipeline installation), should these sites not be assessed as constraints. These sites are listed in the corresponding county development plans with protection and promotion objectives attached to them. Ideally, the sites should not be damaged, or integrity impacted or reduced in any manner due to proposed developments under the plan. However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts.</p> <p>Geotechnical Database resources –</p> <p>Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas.</p> <p>Geological Mapping-</p> <p>Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. These sets include a national coastal geology compilation map combining our bedrock and subsoils geology data and our geoheritage datasets.</p> <p>We would encourage you to use these data which can be found here, in your future assessments. Our 3D models can help stakeholders visualize, understand and characterise geology. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.</p>	
Historic Environment Scotland	<p>We note from the provided SEA scoping report that the historic environment has been scoped into the assessment. However, we note that Appendix C: Baseline Data does not include specific baseline information for the historic environment in Scotland. As a result, we have assumed that it is your consideration that transboundary effects on the historic environment in Scotland are not considered to be significant. On the basis of the</p>	Noted.

Consultee	Comment	Summary of Action Taken
	<p>information contained within the scoping report we are content with the approach and are satisfied with the scope and level of detail proposed for the assessment.</p> <p>We note that it is proposed to consult on the Environmental Report for a 6-week period between October and November 2022 and we agree with this timescale.</p> <p>Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.</p>	
JNCC	<p>JNCC acknowledges that the IOSEA 6 scoping report has adequately scoped in the sensitivities of marine mammal species to pressures arising from the plan, namely underwater noise resulting from seismic surveys.</p>	Noted.
	<p>Section C.2.5.1: Black guillemot distribution need to clarify if sighted frequently or infrequently</p> <p>Table C-10 Razorbill/guillemot, cormorant/shag, herring/common gull, arctic/common tern have not been separated in the table. Please confirm whether this was accounted for in distribution estimates, and if so, how.</p> <p>Page 55 Para 2: A study conducted by Waggit et al. (2020) provides seabird distribution maps at basin and seasonal scales and provides a representation of the distribution patterns of seabirds within the IOSEA6 Area from January to July (Figure C-15)." This sentence needs clarification as the maps are for distribution in January and July not between those months, this was done correctly in figure title.</p> <p>Page 57 C.2.6.2: Mention highly mobile seabird species in transboundary protected areas. Sites need to be taken into consideration</p> <p>Page 59 Map of IOSEA6 Area: MCZs not included on the map</p> <p>Page 70 Table C-12: Birds have not been considered under the collision above and below water with static or moving objects not naturally found in the marine env. If activities are occurring at night, lit up vessels there is the potential to attract certain species and therefore collisions are more likely to occur. References: Merkel, F.R. and Johansen, K.L., 2011. Light-induced bird strikes on vessels in Southwest Greenland. Marine Pollution Bulletin, 62(11), pp.2330-2336.</p>	Relevant sections of Appendix C Section 2 have been updated.

Consultee	Comment	Summary of Action Taken
	<p>Montevecchi, W.A., 2006. Influences of artificial light on marine birds. Ecological consequences of artificial night lighting, pp.94-113.</p> <p>Ryan, P.G., 1991. The impact of the commercial lobster fishery on seabirds at the Tristan da Cunha Islands, South Atlantic Ocean. Biological Conservation, 57(3), pp.339-350</p> <p>Page 73 Pressure: Hydrocarbon and PAH contamination Would this pressure not also have the potential to affect species/habitats outside the IOSEA6 area as well?</p>	
Nature Scot	<p>We agree with the inclusion of all SEA topics for further consideration and consider that the proposed assessment approach is satisfactory.</p> <p>We also note the intention for a 6 week consultation period on the Environmental Report. Please submit this consultation via the Scottish Government SEA gateway.</p>	Noted.
Natural England	<p>The only comment Natural England wishes to make is in respect to the protected sites within English waters. We welcome the inclusion of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites, however, please note that there are additional Marine Protected Areas in the form of Marine Conservation Zones (MCZs) in both inshore and offshore waters.</p>	MCZs have been added into the baseline in Section C.2.6.2 and added MCZ to figure.
SEPA	<p>It is noted that all SEA topics have been scoped into the assessment at this stage. We agree that in this instance all environmental topics should be scoped into the assessment and are satisfied with the proposed assessment approach.</p> <p>We are satisfied with the proposal for a 6 week consultation period for the Environmental Report.</p> <p>On completion, the Environmental Report and the plan to which it relates should be submitted to the Scottish Government SEA Gateway (SEA_Gateway@gov.scot) which will forward it to the Consultation Authorities.</p>	Noted.
NIEA - Marine and Fisheries Division	<p>Note that DAERA is not listed in Section 3.6 Stakeholder Consultation but is listed in Section 7.1 SEA Consultations.</p> <p>Table 4-1: recommends consideration of the following plans, programmes and legislation:</p> <ul style="list-style-type: none"> - Marine and Coastal Access Act 2009 - Marine Act (Northern Ireland) 2013 	The PPS review has been updated to include PPS and legislation recommended.

Consultee	Comment	Summary of Action Taken
	<p>- Wildlife (Northern Ireland) Order 1985</p> <p>- Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995</p> <p>Table 3-2: Recommends that disturbance to marine mammals should include underwater noise from seismic surveys, drilling and associated vessels.</p> <p>Table 3-3: believe Biodiversity, Flora and Fauna has a potential inter-relationship with Cultural, Architectural and Archaeological Heritage as marine species such as seaweed, hydroids etc. often grow on archaeological features such as shipwrecks and can create feeding grounds and 'hiding' places for fish and other species, establishing an ecosystem around these shipwrecks.</p> <p>Table 5-1:</p> <p>-Marine Mammals: MCA highlights the importance of considering cetaceans and pinnipeds regarding marine noise pollution associated with seismic surveys, drilling and associated vessels.</p> <p>- Designated Habitats and Species: MCA recommends considering the transboundary MPAs.</p> <p>-Invasive Non-Native Species: MCA highlights the importance of having good biosecurity measures associated with all vessels and equipment utilised</p> <p>Section C.2.8: MCA recommends using the DAERA Marine Map Viewer to view additional INNS records</p> <p>Section C.6.5: MCA recommends considering the potential impacts of seismic exploration activities to marine mammals in Section C.6.5 Potential Sensitivities to the Plan.</p> <p>useful to consider those relevant LDPs and their contained policies for Council areas which have a coastal remit - Derry City & Strabane District Council; Causeway Coast and Glens Borough Council, Mid and East Antrim District Council Belfast City Council; Ards and North Down; and Newry, Mourne and Down District Council.</p>	<p>The inter-relationship between Biodiversity, Flora and Fauna and Cultural Heritage has been recognised in Table 3-5.</p> <p>Section C2.8 has been updated.</p>
	<p>2. Avoid damage to the biodiversity, flora and fauna of Ireland and its seas, particularly EU designated sites and protected species. MCA recommends this section also</p>	<p>The SEOs have been revised to take into account comments provided.</p>

Consultee	Comment	Summary of Action Taken
	<p>considers transboundary waters.</p> <p>3. Contribute to the delivery of the green economy. MCA recommends consideration is also given to the 'blue economy' and 'blue carbon'.</p> <p>7. Protect the quality of the seabed, coastline and its sediments. MCA welcomes this objective.</p> <p>8. Protect the landscape/seascape character and visual amenity. MCA welcomes this objective.</p>	

2.3 Environmental Report Consultation

The Environmental Report (ER) was subjected to statutory, stakeholder and public consultation for a seven-week period from 28 November 2022 to 17 January 2023 (Intertek, 2022b).

2.3.1 ER Consultation Responses

The ER received 13 responses were received from statutory consultees and non-statutory authorities, two from industry and two responses from members of the public.

Table 2-2, 2-3 and 2-4 below summarises the relevant consultation responses received from the ER consultation and how these have been addressed in the final Plan.

Table 2-2 Consultation Feedback for Environmental Report and Plan - Statutory/non statutory consultee

Consultee	Comment	Summary of Action Taken
CIL	<p>Reviewed this consultation and have no objections from a safety of navigation perspective.</p> <p>National Marine Planning Framework (NMPF) Ports, Harbours and Shipping Ch18:</p> <p>Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have:</p> <ul style="list-style-type: none">- been informed by consultation at pre-application stage or earlier with the relevant port authority;- have carried out a navigational risk assessment including an analysis of maritime traffic in the area; and	<p>The PPS review has been updated to note requirements of the NMPF in relation to navigation.</p>

Consultee	Comment	Summary of Action Taken
	<p>- have consulted Department of Transport, MSO and Commissioners of Irish Lights. Applicants must continue to engage parties identified in pre-application processes as appropriate during the decision-making process.</p> <p>NMPF Ports, Harbours and Shipping Ch18: Irish Lights Risk Assessment processes can identify any increase in navigational risk and potential mitigation measures. Issues include:</p> <p>- The protection of the use of the shortest routes to ports, thus the most economic route with the least carbon footprint.</p> <p>- Supporting the tourist, leisure and fishing sectors, promoting safety at sea, and encouraging safe development of coastal infrastructure and commercial activity, such as offshore exploration and renewable energy.</p> <p>NMPF Safety at Sea Ch19: Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.</p>	
CRU - Commission for Regulation of Utilities	CRU remit for upstream (offshore and onshore) petroleum exploration/extraction, environmental role under the Petroleum Safety Act 2015 including major environmental incidents resulting from major accidents. Given the limited environmental remit as per these conditions CRU have no comments on the ongoing consultation.	Noted.
DAFM - Department Agriculture, Food and the Marine and Marine Institute	<p>The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself.</p> <p>It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, we recommend consulting the fisheries Producer Organisations. Contact details for number of organisations provided.</p> <p>The list of consultees on page 36 of the Scoping Report includes the Federation of Irish Fishermen. This organisation is defunct, and instead we recommend consulting the fisheries Producer Organisations. These organisations are listed below: Killybegs Fishermen's Organisation Irish South and East Fish Producers Organisation</p>	<p>Impacts on commercial fishing activities is considered in the environmental assessment.</p> <p>Suggested fisheries Producer Organisations added to list of consultees on the ER.</p>

Consultee	Comment	Summary of Action Taken
	<p>Irish Fish Producers Organisation Clogherhead Co-op National Inshore Fisheries Forum Irish Fish Processors and Exporters Association Irish South and West Fish Producers Organisation Irish South and West Irish Islands Marine Resource Organisation</p>	
	<p>The IOSEA6 report is an excellent overview of fish, shellfish and fisheries in Irish waters. Number of small recommendations made for baseline section.</p> <p>Section C.8.9.1 and C.5.7.1 are not an accurate representation of the current overfishing situation and are based on non-official or not peer reviewed sources and should be removed or modified.</p>	<p>Section C.8.9.1 has been mortified, section C.5.7.1 has been removed.</p>
	<p>Section C.2.3: Few minor points like herring are misplaced in the demersal fish section, horse mackerel and boarfish are also important pelagic species in the area.</p>	<p>Section C.2.3 has been updated to include species mentioned and herring statement edited.</p>
	<p>Section C.8.1.1: While it is made clear in the figure legends for Figures C-36 to C-38 it could also be stated in the text that the maps represent fishing effort for >12m vessels.</p>	<p>A note has been made within section. C.8.1.1 regarding fishing vessels greater than 12m.</p>
	<p>Section C.8.9.1 is stated that “Ireland has a significant problem with overfishing” which is probably something that DAFM would contest. is true to say that overfishing was a historical problem in the past in the IOSEA6 area significant progress has been made to end overfishing and bring down fishing mortality rates to sustainable levels. The latest ICES fisheries overview for the Celtic Seas (ICES, 2021) clearly shows declining levels of overfishing for many stocks and species groups especially since around 2000. The Marine Institute Stockbook also indicates that fishing pressure has declined on many stocks, and many are no longer considered over fished (Marine Institute, 2021).</p>	<p>This section has been updated as per the ICES and Marine Institute references.</p>
	<p>Section C.5.7.1: Similar comments to C.8.9.1, Bird Watch Report just requoting New Economics Foundation Reports</p>	<p>Section C5.7.1 has been removed, and sections C.8.9.1 has been updated.</p>
	<p>Section C.8.11 Table C-36: section identifies overviews of commercial fish distributions and the fisheries that exploit them as a key data gap. The VMS linked logbook information in the Atlas of commercial fisheries is available for the years 2019-2022 with a</p>	<p>The data gaps sections have been updated taking into account the consultation response</p>

Consultee	Comment	Summary of Action Taken
	lag of around 1 year due to data transmission delays. So it is not a data gap per se the data is available from the Marine Institute but is just not published. Caveat is that VMS data biased to species. Ground fish survey and other MI fisheries surveys are conducted annually (Nephrops UWTV and acoustic survey). Main data gap lack of species distributions models and up to date synthesis of knowledge on essential fish habitats.	
EPA	<p>This submission highlights some key environmental issues to consider in preparing the Plan and SEA.</p> <p>Our State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen Key Messages for Ireland. Delivering Ireland's long term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies. The SOER2020 messages are also linked to a number of the UN's Sustainable Development Goals, in particular Climate Action, Life on Land and Life below Water. Addressing and implementing these actions will be important in delivering environmental protection and promoting sustainable development in Ireland. In finalising the Plan and integrating the findings of the SEA into the Plan, the relevant recommendations, key issues and challenges described in the EPAs SOER2020 should be taken into account.</p>	The State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 report has been reviewed in the preparation of this SEA.
	<p>The integration of the SEA process into the Plan should reflect the overall objective of the SEA Directive "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes".</p> <p>All recommendations from the SEA, including mitigation measures, should be integrated into the Plan. Fully integrating the findings and recommendations of the SEA into the Plan will be key to strengthening its overall positive commitments while ensuring that any significant adverse effects of implementing the Plan are mitigated. The SEA Environmental Report should include a chapter outlining how the recommendations and mitigation measures from the SEA, and any other environmental assessments, have been incorporated into the Plan. We recommend that, the SEA Environmental Report includes summary tables outlining the key findings of the SEA and linking the significant</p>	The SEA has helped define the limits of the Draft Plan and identify suitable mitigation to be considered at project level to minimise and avoid the potential effects on the environment.

Consultee	Comment	Summary of Action Taken
	<p>environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Plan policies/measures.</p> <p>SEA requires that significant environmental effects of implementing a plan are monitored in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action. The SEA environmental report must include a description of the measures envisaged concerning monitoring. The Plan should include a commitment to implement SEA-related environmental monitoring requirements and the associated reporting.</p> <p>The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any unforeseen environmental issues that may arise. The SEA Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring.</p> <p>The Plan should include a commitment to monitor the Plan over its lifetime to determine how well and effective the environmental-related objectives of the Plan are being met in implementing the Plan. The Plan should also take account of the SEA-related monitoring programme and associated reporting aspects also. We suggest including a separate section on 'Monitoring, Implementation and Reporting' in the Plan, setting out the provisions for monitoring (including SEA-related monitoring) and reporting considerations. It would be helpful also to specify the frequency of monitoring or periodic reviews of the Plan over its lifetime.</p> <p>There may be merits in aligning the periodic reviews of the Plan with existing cyclical reporting.</p> <p>The Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. To avoid duplication in data collection, the same indicators should be used for the plan-related and SEA-related monitoring where possible.</p>	<p>Section 5 of the ER presents the approach to monitoring. Monitoring will be undertaken at Project level and used to inform the effectiveness of the Plan.</p>
	<p>We recommend including schematics in the SEA Environmental Report, showing the links and key inter-relationships between the Plan and other key relevant national, regional, sectoral and environmental plans/programmes (e.g., the National Marine Planning</p>	<p>The use of Schematics was considered in the preparation of the report but not implemented.</p>

Consultee	Comment	Summary of Action Taken
	Framework, Offshore Renewable Energy Development Plan, Seafood Development Programme 2021-2027 etc.) and legislation.	Section 3 of the ER sets out the relevant Policies and Legislative Framework for the Plan.
	Appendix I provides info on next steps and available guidance and resources.	These guidance documents have been reviewed in the preparation of this ER.
	Scoping report should consider whether there is potential for likely significant effects perceived on neighbouring Member States. Additionally, we advise that consultation should be undertaken at a minimum with the relevant ministries/agencies in Northern Ireland and the UK. The relevant requirements of the SEA protocol ¹ under the ESPOO Convention should be taken into account, for any possible transboundary consultations with non-EU Member States.	We note that effects of the plan may impact transboundary waters. Transboundary consultation has been undertaken.
	Section 3.4, it would be useful to consider the extent to which waste management associated with aspects such as drilling muds and other materials are considered in the SEA. Given the amount of seismic survey activity planned, a more comprehensive review of the MSFD Descriptor 11 (Underwater Noise) would be useful to consider.	MSFD Descriptor 11 was considered in the environmental assessment.
	Welcome that the scoping report acknowledges the "Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA)" Reasons for selecting the alternatives considered should include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Summary of alternative scenarios considered and the justification for selection of the preferred scenario/ combination of scenarios should also be provided. Suggest that the EPA Good Practice note for on SEA for the Energy Sector (EPA, 2021) may be useful to consider at this time also.	This guidance was reviewed in preparation of alternative options for the Plan. Reasons for not selecting certain options are listed in Section 4.1. The guidance on good practice on SEA for the Energy Sector was also utilised.
	The EPA has published Guidance on SEA Statements and Monitoring, which should be considered in the preparation of the SEA statement. In addition, the DECC is required to publish a newspaper notice inviting submissions/observations from the public on both the Plan and the SEA environmental	The consultation period of 6 weeks is considered appropriate for the ER and Plan.

Consultee	Comment	Summary of Action Taken
	<p>report. The SEA regulations refer to a public consultation period of not less than 4 weeks, however, given the national aspect of this Plan it is suggested that allowing a longer consultation period, 8-12 weeks, would be more appropriate.</p> <p>In accordance with Article 16 of the SEA Regulations DECC is required to publish a SEA Statement alongside the adopted Plan, summarising:</p> <ul style="list-style-type: none"> • how environmental considerations have been integrated into the Plan; • how the environmental report and consultation comments on it have been taken into account; <p>Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine • the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with (in the Environmental Report and the associated consultation); • the measures decided concerning monitoring. 	An SEA statement will be produced upon adoption of the Plan.
	<p>We note the environmental objectives set out in Table 6.1 – Draft SEA Objectives for the assessment of the Plan. With regards the Climatic Factors objective, there is merit in clarifying how the Plan will ‘contribute to the delivery of the green economy’.</p> <p>Under the ‘Economy and Material assets’ topic, objective 5 (Protect and enhance existing infrastructure) could be amended to clarify the type of infrastructure covered, i.e., national/international and the various relevant sectoral infrastructure contained in the marine environment.</p> <p>The objective associated with the Water topic, could be amended to refer to supporting achievement of the objectives of the Marine Strategy Framework Directive.</p>	The SEOs have been revised to take into account comments provided.
	<p>The Plan should identify any significant data and knowledge gaps, including commitments to help address these on a priority basis during the implementation phase of the Plan. This is with a view to strengthening the evidence base for future reviews and iterations of the Plan.</p>	The ER includes data gaps in Section 3.5.

Consultee	Comment	Summary of Action Taken
	The SEA Environmental Report should refer to the full range of effects and of the area likely to be affected. This assessment should consider the duration and frequency of effects as well as short, medium and long-term, cumulative and synergistic effects of the legislation.	The environmental assessment includes consideration of these effects.
	The geographical scope of the SEA is limited to the effects of the Plan within Ireland. The spatial coverage of the SEA should include both our coastal waters and offshore islands. The scoping report should consider whether there is potential for likely significant effects perceived on neighbouring Member States. Additionally, we advise that consultation should be undertaken at a minimum with the relevant ministries/agencies in Northern Ireland and the UK. The relevant requirements of the SEA protocol ¹ under the ESPOO Convention should be taken into account, for any possible transboundary consultations with non-EU Member States.	We note that effects of the plan may impact transboundary waters. Transboundary consultation has been undertaken.
	Following the completion of the public consultation on the SEA environmental report and the Plan, the final stages of the SEA process are to integrate and document the environmental considerations of the SEA environmental report into the Plan, as appropriate. The EPA has published Guidance on SEA Statements and Monitoring, which should be considered in the preparation of the SEA statement.	Noted.
	Appendix II sets out some additional plans and additional resources that may be useful to consider.	The PPS review has been updated to include PPS and legislation recommended.
Geological Survey Ireland	Geological Survey Ireland would encourage use of and reference to our datasets. This data can add to the content and robustness of the SEA process. Provided list of datasets.	Recommended datasets were reviewed and used to update the baseline data sections of the ER for relevant topic sections.
	Geological Survey Ireland have provided advice and information on particular topics which can add to the content and robustness of the SEA process. This advice includes: Marine and Coastal Unit - Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. Demonstrated applications for the use of INFOMAR's suite of mapping products include	All advice that has been recommended by the GSI has been taken into account within the ER.

Consultee	Comment	Summary of Action Taken
	<p>Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.</p> <p>Coastal Vulnerability index - Geological Survey Ireland is undertaking a new coastal vulnerability mapping initiative. Maps produced by this project will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea-level rise through the use of a Coastal Vulnerability Index (CVI).</p> <p>Geoheritage –</p> <p>Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts. County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer. There are numerous coastal and island County Geological Sites. We would recommend consultation of the Geological Heritage viewer as there may be potential impacts on the integrity of current CGSs envisaged by potential offshore petroleum activities, (including associated onshore site works and cable/pipeline installation), should these sites not be assessed as constraints. These sites are listed in the corresponding county development plans with protection and promotion objectives attached to them. Ideally, the sites should not be damaged, or integrity impacted or reduced in any manner due to proposed developments under the plan. However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts.</p> <p>Geotechnical Database resources –</p>	

Consultee	Comment	Summary of Action Taken
	<p>Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas.</p> <p>Geological Mapping-</p> <p>Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. These sets include a national coastal geology compilation map combining our bedrock and subsoils geology data and our geoheritage datasets.</p> <p>We would encourage you to use these data which can be found here, in your future assessments. Our 3D models can help stakeholders visualize, understand and characterise geology. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.</p>	
Historic Environment Scotland	<p>We note from the provided SEA scoping report that the historic environment has been scoped into the assessment. However, we note that Appendix C: Baseline Data does not include specific baseline information for the historic environment in Scotland. As a result, we have assumed that it is your consideration that transboundary effects on the historic environment in Scotland are not considered to be significant. On the basis of the information contained within the scoping report we are content with the approach and are satisfied with the scope and level of detail proposed for the assessment.</p> <p>We note that it is proposed to consult on the Environmental Report for a 6-week period between October and November 2022 and we agree with this timescale.</p> <p>Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.</p>	Noted.
JNCC	JNCC acknowledges that the IOSEA 6 scoping report has adequately scoped in the sensitivities of marine mammal species to pressures arising from the plan, namely underwater noise resulting from seismic surveys.	Noted.

Consultee	Comment	Summary of Action Taken
	<p>Section C.2.5.1: Black guillemot distribution need to clarify if sighted frequently or infrequently.</p> <p>Table C-10 Razorbill/guillemot, cormorant/shag, herring/common gull, arctic/common tern have not been separated in the table. Please confirm whether this was accounted for in distribution estimates, and if so, how.</p> <p>Page 55 Para 2: A study conducted by Waggit et al. (2020) provides seabird distribution maps at basin and seasonal scales and provides a representation of the distribution patterns of seabirds within the IOSEA6 Area from January to July (Figure C-15).” This sentence needs clarification as the maps are for distribution in January and July not between those months, this was done correctly in figure title.</p> <p>Page 57 C.2.6.2: Mention highly mobile seabird species in transboundary protected areas. Sites need to be taken into consideration.</p> <p>Page 59 Map of IOSEA6 Area: MCZs not included on the map.</p> <p>Page 70 Table C-12: Birds have not been considered under the collision above and below water with static or moving objects not naturally found in the marine env. If activities are occurring at night, lit up vessels there is the potential to attract certain species and therefore collisions are more likely to occur. References: Merkel, F.R. and Johansen, K.L., 2011. Light-induced bird strikes on vessels in Southwest Greenland. Marine Pollution Bulletin, 62(11), pp.2330-2336.</p> <p>Montevecchi, W.A., 2006. Influences of artificial light on marine birds. Ecological consequences of artificial night lighting, pp.94-113.</p> <p>Ryan, P.G., 1991. The impact of the commercial lobster fishery on seabirds at the Tristan da Cunha Islands, South Atlantic Ocean. Biological Conservation, 57(3), pp.339-350</p> <p>Page 73 Pressure: Hydrocarbon and PAH contamination Would this pressure not also have the potential to affect species/habitats outside the IOSEA6 area as well?</p>	<p>Relevant sections of Appendix C Section 2 have been updated.</p>
Nature Scot	<p>We agree with the inclusion of all SEA topics for further consideration and consider that the proposed assessment approach is satisfactory.</p> <p>We also note the intention for a 6 week consultation period on the Environmental Report. Please submit this consultation via the Scottish Government SEA gateway.</p>	<p>Noted.</p>

Consultee	Comment	Summary of Action Taken
Natural England	The only comment Natural England wishes to make is in respect to the protected sites within English waters. We welcome the inclusion of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites, however, please note that there are additional Marine Protected Areas in the form of Marine Conservation Zones (MCZs) in both inshore and offshore waters.	MCZs have been added into the baseline in Section C.2.6.2 and added MCZ to figure.
SEPA	<p>It is noted that all SEA topics have been scoped into the assessment at this stage. We agree that in this instance all environmental topics should be scoped into the assessment and are satisfied with the proposed assessment approach.</p> <p>We are satisfied with the proposal for a 6 week consultation period for the Environmental Report.</p> <p>On completion, the Environmental Report and the plan to which it relates should be submitted to the Scottish Government SEA Gateway (SEA_Gateway@gov.scot) which will forward it to the Consultation Authorities.</p>	Noted.
NIEA - Marine and Fisheries Division	<p>Note that DAERA is not listed in Section 3.6 Stakeholder Consultation but is listed in Section 7.1 SEA Consultations.</p> <p>Table 4-1: recommends consideration of the following plans, programmes and legislation:</p> <ul style="list-style-type: none"> - Marine and Coastal Access Act 2009 - Marine Act (Northern Ireland) 2013 - Wildlife (Northern Ireland) Order 1985 - Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 	The PPS review has been updated to include PPS and legislation recommended.
	<p>Table 3-2: Recommends that disturbance to marine mammals should include underwater noise from seismic surveys, drilling and associated vessels.</p> <p>Table 3-3: believe Biodiversity, Flora and Fauna has a potential inter-relationship with Cultural, Architectural and Archaeological Heritage as marine species such as seaweed, hydroids etc. often grow on archaeological features such as shipwrecks and can create feeding grounds and 'hiding' places for fish and other species, establishing an ecosystem around these shipwrecks.</p> <p>Table 5-1:</p> <p>-Marine Mammals: MCA highlights the importance of considering cetaceans and pinnipeds regarding marine noise pollution associated with seismic surveys, drilling and</p>	<p>The inter-relationship between Biodiversity, Flora and Fauna and Cultural Heritage has been recognised in Table 3-5.</p> <p>Section C2.8 has been updated.</p>

Consultee	Comment	Summary of Action Taken
	<p>associated vessels.</p> <p>- Designated Habitats and Species: MCA recommends considering the transboundary MPAs.</p> <p>-Invasive Non-Native Species: MCA highlights the importance of having good biosecurity measures associated with all vessels and equipment utilised.</p> <p>Section C.2.8: MCA recommends using the DAERA Marine Map Viewer to view additional INNS records.</p> <p>Section C.6.5: MCA recommends considering the potential impacts of seismic exploration activities to marine mammals in Section C.6.5 Potential Sensitivities to the Plan.</p> <p>useful to consider those relevant LDPs and their contained policies for Council areas which have a coastal remit - Derry City & Strabane District Council; Causeway Coast and Glens Borough Council, Mid and East Antrim District Council Belfast City Council; Ards and North Down; and Newry, Mourne and Down District Council.</p>	
	<p>2. Avoid damage to the biodiversity, flora and fauna of Ireland and its seas, particularly EU designated sites and protected species. MCA recommends this section also considers transboundary waters.</p> <p>3. Contribute to the delivery of the green economy. MCA recommends consideration is also given to the 'blue economy' and 'blue carbon'.</p> <p>7. Protect the quality of the seabed, coastline and its sediments. MCA welcomes this objective.</p> <p>8. Protect the landscape/seascape character and visual amenity. MCA welcomes this objective.</p>	The SEOs have been revised to take into account comments provided.

3 Screening for Appropriate Assessment (AA) and Natura Impact Statement (NIS)

The methodology for the Screening for AA was produced in January 2022 and NPWS were consulted with on the approach to be used to screen the sites and the impacts to be assessed.

3.1 Screening for AA Consultation

The report to inform Screening for AA was consulted upon in April 2022. Following review of initial feedback, the report was updated to address comments received and submitted for further consultation in July 2022 (Intertek, 2022c). The edits made to the report mainly consisted of inclusion of missing sites and re-ordering the screening tables.

3.1.1 Screening for AA Report Consultation Responses

The comments received on the Screening for AA are summarised in Table 3-1 with comments on how they have been addressed within the NIS (Intertek, 2022d).

Table 3-1 Consultation Feedback for the Screening for AA Report

Consultee	Comment	Summary of Action Taken
Department of Housing, Local Government and Heritage (DHLGH)	Screening concluded that an LSE could not be excluded. DHLGH concurs with this conclusion and recommends that a Natura Impact Statement is generated to evaluate the potential interaction with designated sites from the proposed plan.	NIS prepared.
	Cetaceans must be considered.	Cetaceans are considered in this NIS.
Joint Nature Conservation Committee (JNCC)	Table A-2 and Table A-3 incorrectly titled.	Updated in Revised Screening for AA report.

Consultee	Comment	Summary of Action Taken
Scottish Natural Heritage (NatureScot)	No requirement to screen in any Scottish Special Areas of Conservation (SACs) due to distances. Atlantic salmon migrate northwards from their natal rivers, therefore, unlikely to encounter the proposed area of exploration and associated activities.	Scottish sites included for Atlantic salmon as feature were removed from consideration in the NIS.
	Brook lamprey do not leave freshwater habitats, therefore, can be screened out.	Brook lamprey removed from consideration.
	Refer to agreed foraging ranges to screen in species and identify from which breeding colony SPA. Key species to be considered are gannet, fulmar, shearwaters and petrels.	It was not considered appropriate to consider foraging ranges as a means of screening sites. This will be undertaken at the project level.
Natural England	Table A-2 and Table A-3 incorrectly titled.	Tables were incorrectly duplicated, correct tables resent to consultees.
	River based SACs with Annex 1 habitats and Annex II fish as protected features not identified. For example, River Derwent and Bassenthwaite Lake SAC and River Ehen SAC are not listed (note this is not an exhaustive list). We advise that these sites, and others with Annex II fish (and fish assemblage features) in particular are considered within the screening assessment for completeness.	These sites were added to the Revised Screening for AA report.
	Ramsars sites do not include, however, understand HRA is being undertaken in line with Irish Law.	No action needed.
	Consideration of MCZs required.	MCZ will be considered in the SEA Environmental Report.
Northern Ireland Environment Agency (NIEA) - Marine and Fisheries Division	Table A-2, Table A-3 and Table A-4 incorrectly titled.	Updated in Revised Screening for AA report.
	East Coast Marine proposed SPA and the Carlingford Marine proposed SPA to be included.	These sites were added to the Revised Screening for AA report.
	Consideration of INNS introduced through drill rig ballast water and INNS to be added as a pressure in the conclusion.	This pressure was screened out of the assessment.
	Section 3.2.3.1 underwater noise can also lead to death of marine mammals.	Updated in Revised Screening for AA report.
Natural Resources Wales (NRW)	Unclear about the outcome of screening for sites in Wales that have marine mammals as a feature. Sites which have been correctly identified for screening in Table 3-2, the outcome of screening has not been recorded in Appendix A-4. All Welsh sites that host harbour	Marine Mammal Management units (MMMU) were considered when screening the sites.

Consultee	Comment	Summary of Action Taken
	porpoise and bottlenose dolphin as features should be screened into the appropriate assessment on the basis that a likely significant effect from those pressures that have been scoped into further assessment cannot be excluded.	
	There is no screening record for Mynydd Cilan, Trwyn y Wylfa ac Ynysoedd Sant Tudwal SPA, although we agree this can be screened out.	No action needed.
DHLGH	The Department has reviewed the amendments and these changes don't alter the previous comments requesting that the application should proceed to further environmental evaluation. The Department has no additional comments at this point.	NIS prepared.
JNCC	We note the screening document now contains details of UK SPAs and SACs to be screened into appropriate assessment. We agree with the sites identified to be screened in and have no further comments at this stage.	No action needed.
Scottish Natural Heritage (NatureScot)	Having reviewed the revised draft, NatureScot still disagree with many of the conclusions reached for our SACs. There are three SACs, scoped out for further consideration and the rest remain in (Appendix A-3). A number of the sites being taken forward into the LSE stage are sites with a mixture of habitats and mobile species as qualifying interests. Many are at a great distance from any of the proposed exploration or drilling sites. It is unclear on the rationale for excluding some and leaving the rest in. Either all should be in or out.	GIS was used to determine how connected areas were to the IOSEA6 Study Areas. Where sites were sheltered by headlands or islands it was determined that if an accidental oil spill occurred these areas (and other shorelines prior to this) would receive the initial beaching of oil and, therefore, ensure these sites were not directly impacted.
	There is a mixture of Scottish SPA screened out and others screened in and again it appears not to be related to the impact pathway from an accident. We advise all should be screened in or out.	
	Accidental event impact pathway – this appears to be the key impact pathway for screening in Scottish sites. We advise if these are all screened in at this stage, the measure identified to manage such an event should be outlined in the Plan. Additionally, you may want to consider tidal modelling etc. for different pollution scenarios on how far any such pollution will reach to determine hypothetically if there will be an adverse effect on site on integrity or not.	Oil spill modelling is utilised within the NIS and mitigation measures to manage an accidental event if one occurred.

Consultee	Comment	Summary of Action Taken
Natural England	<p>We welcome the updated documents.</p> <p>Natural England notes that amendments have been made in line with our previous advice and we have no further comments at this time.</p>	No action needed.
NIEA - Marine and Fisheries Division	Confirm they are content with revision in the revised Screening for AA report.	No action needed.
	Reiterate comment on ballast water discharges and ask that ballast water is treated prior to drilling commencing in line with the Ballast Water Management Convention.	Ballast Water Management Convention is included as part of the embedded mitigation and best practice measures (Table 6-1).
NRW	The only observation we would make is that D grade SAC features have been included for some of the screened-in sites, such as Cardigan Bay SAC includes Harbour porpoise which is categorised as a 'D grade feature'. It is not normally a requirement to screen these features into HRA in the UK.	Noted. We have assessed all sites with interest features no matter what the grade.

3.2 NIS Consultation

Following Screening a Natura Impact Statement (NIS) was produced released for consultation alongside the SEA ER for a period of seven weeks from 28 November 2022 to 17 January 2023 (Intertek, 2022d).

3.2.1 Screening for AA Report Consultation Responses

The comments received on the NIS are summarised in Table 3-2 with comments on how they have been addressed in the final Plan.

Table 3-2 Consultation Feedback for the NIS Report

Consultee	Summarised Comment	Summary of action taken
NatureScot	<p>NIS comment: We note that our previous comments on screening in Scottish European Sites have only partially been acted upon. There are still a number of sites (St Kilda, Sound of Barra and Solway Firth SACs) that seem to have been further assessed, where we consider LSE from seismic / drilling and accidental pollution events to be unlikely.</p> <p>If these aforementioned sites have been assessed then we suggest that the Inner Hebrides and Minches SAC with respect to its harbour porpoise feature, should also have been included - although as above we consider that LSE to this site is unlikely.</p>	<p>These sites were selected through use of GIS when it was concluded that in the event of a large unmitigated oil spill hydrocarbons may reach this area.</p> <p>The Inner Hebrides and Minches SAC was screened out of the assessment at the Screening stage as the site is not within a Marine Mammal Management Unit (MMMU) for harbour porpoise which intersects the IOSEA6 Study area (i.e., authorisations).</p>
	<p>NIS comment: We note that the NIS recommends that for potential projects to avoid LSE, further detailed assessment will be required, and consideration given to the specific implementation of the mitigation measures outlined in the draft Plan. We have no further comments to make.</p>	Noted.
Natural England	<p>NIS comment: Natural England provided comments on the Stage 1 screening assessment in April 2022 and acknowledge that our advice on inclusion of certain sites was taken onboard.</p>	Noted.
	<p>NIS comment: The NIS identifies the potential for LSE for some English Transboundary SACs from seismic survey and drilling activities. Whilst we acknowledge and welcome</p>	Species that have been incorrectly listed as Qualifying Interests will be removed and sites

Consultee	Summarised Comment	Summary of action taken
	this precautionary approach, we advise that you should reconsider the assessment as some of the English sites do not have the qualifying features that have been identified in Table 5-2	reassessed for potential adverse effects on conservation objectives.
	NIS comment: We welcome the modelling undertaken to identify the potential oil spill shoreline impact on protected sites and this is visually well presented for ease of the reader. We agree with the precautionary approach that identifies LSE for the English sites with respect to potential impact from an accidental event. We welcome the mitigation measures highlighted within section 6.3 and the statement that highlights that this should be reassessed at project level.	Noted.
	NIS comment: The proposed mitigation measures identified in Section 6 provide a clear list of measures that will be embedded in projects, and this will help to ensure consistency.	Noted.
JNCC	NIS comment: JNCC does not agree that foraging ranges are not an appropriate screening tool, as stated in Table 4-1 Response to NatureScot comments on use of foraging range for LSE screening. For species with large foraging ranges there is the potential for impact and therefore LSE cannot be ruled out.	Due to the Plan level assessment (large study area, large number of sites and species) it was not considered appropriate to use this form of screening. However, it is agreed that this approach is suitable at Project level.
	NIS comment: Section 5.1.2.2. seems to make an assumption of only one vessel operating in an area, and that single passes would occur. However, ER section 4.2 states a maximum of 2 vessels for seismic surveys, with the typical time for a seismic survey being four weeks. typical survey parameters could be used to give a high-level assessment of disturbance risk. We agree that slower moving vessels appear to be less disturbing, but conversely, they are likely to be present in an area for longer.	Noted. During a survey one vessel would undertake the seismic data acquisition, with support from smaller support vessel (on occasions). This additional vessel will not have a noticeable impact on visual disturbance given background levels. This impact will be considered at project level (where relevant).
	NIS comment: Whilst Section 5.1.2.2. comments on disturbance, the NIS makes no mention of the potential for attraction. This is particularly relevant to Manx shearwater and petrel species. While it is unlikely to lead to significant adverse impact at a population scale. Mitigation measures proposed.	Suggested additional mitigation have been added into Annex II of the Plan.
	NIS comment: The Irish Sea Front SPA and sites classified for non-breeding species were screened into Appropriate Assessment for impacts from accidental release (Table 3-4), but don't seem to have been considered further in Section 5.2.9.4.	While not explicitly stated impacts on offshore SPAs (and SAC) were assessed. Due to the Plan level assessment and number of variables it was

Consultee	Summarised Comment	Summary of action taken
	Potential oil spill shoreline impact on SPAs is discussed on page 45 but does not include any offshore SPAs. Section 5.2.9.4 discusses potential offshore impacts on seabirds but there is no reference to specific sites or species that may be in high densities etc. Data and maps presented in ER section 4.3.1 could have been presented here to illustrate risk and to inform whether Adverse Effects On Integrity can be ruled out for all sites under consideration.	concluded that a large oil spill could have significant impact on seabirds without mitigation. It is noted that the inclusion of the data for probability of surface sheen (from the ER) could have been used to support the NIS.
	NIS comment: We would expect to see survey specific noise modelling being carried out as part of the licensing process to determine the minimum distance at which Permanent Threshold Shift could occur from the air guns (pg. 34).	Noted. Noise modelling will be undertaken at Project level where required.
DAERA NI	NIS Comment: We are content that given the distance involved, the closest Northern Ireland site, located 220.8km from the nearest exploration and drilling site, is unlikely to have an impact on the selection features of sites, listed within NIS.	Noted.
	NIS Comment: We note that modelling has been undertaken on accidental releases from drilling sites which shows that the likelihood of any such release reaching a Northern Ireland designated site as being less than 5%. Given the low risk and the distance involved Natural Environment Division is content that the plan is unlikely to have a significant impact on Northern Ireland designated sites.	Noted.
	NIS Comment: There is a typo on p46, Irish sites are listed on Table 5-4 and UK sites on Table 5-5, not table 5-3 and 5-4 as stated in the text. Additionally, on p52 the text should read Table 5-6 and 5-7 for the assessment of LSEs and not Table 5-3 and 5-4 as stated.	Noted, this will be amended.
EnerGeo Alliance	NIS comment: The Impact Statement provides a balanced review of the literature relating to the potential impacts of underwater sound on marine species, including both fish and marine mammals. EnerGeo concurs with the conclusion that the disturbance effects to fish species from a transient and brief activity are also likely to be brief and therefore not significant. Additional data research paper provided to support conclusions.	Noted.
	NIS Comment: EnerGeo Alliance concurs with the findings of the Impact Statement, noting the balanced literature review and pragmatic finding that the potential impacts from seismic surveys are not significant, and well managed using established mitigation measures.	Noted.

4 References

1 Intertek, (2022a). Irish Offshore Strategic Environmental Assessment 6 - SEA Scoping Report. Prepared for Department of the Environment, Climate and Communications.

2 Intertek, (2022b). Irish Offshore Strategic Environmental Assessment 6 – Strategic Environmental Assessment - Environmental Report. Prepared for Department of the Environment, Climate and Communications.

3 Intertek, (2022c). Irish Offshore Strategic Environmental Assessment 6 – Stage 1: Screening for Appropriate Assessment. Prepared for Department of the Environment, Climate and Communications.

Intertek, (2022d). Irish Offshore Strategic Environmental Assessment 6 – Natura Impact Statement. Prepared for Department of the Environment, Climate and Communications.