

Response to Public Submissions

Summary: Summary Response document on Celtic Offshore Wind Foreshore Licence Application Public Submissions.

ESB Wind Development Limited (Ltd), has applied for a Foreshore Licence to undertake marine site investigations to inform feasibility assessments and design relating to the Celtic Offshore Wind project to the south of County Cork and to the southwest of County Waterford. These site investigation works include Geophysical surveys, Geotechnical surveys, Metocean surveys, Environmental/Ecological and Archaeological surveys.

A public consultation was undertaken as part of the foreshore licensing process between 6th March 2023 and 4th April 2023 and seven responses were received from the following organisations and individuals:

- Submission 1: Inshore Fisher
- Submission 2: Wild Ireland Defence
- Submission 3: Fishers
- Submission 4: Fishers
- Submission 5: Fishers - O Donovan Seafoods
- Submission 6: Fishers - O Donovan Seafoods
- Submission 7: Inshore Fisher

ESB Wind Development Ltd (ESB) welcomes all responses received and addresses each one below either alone or collectively depending on the content of the response.

We would like to highlight that the licence application is for site investigation activities only and any subsequent wind farm development and consenting activities are outside the scope of this application.

Responses to Submissions Received

Submission 1: Inshore Fisher

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>I am deeply concerned that my livelihood will be adversely affected in the coming months and beyond due to the planned surveys under this application and subsequent investigation works. The conflict between the right to fish in coastal areas and the right to lay underwater cables and associated surveys, has become an increasingly contested matter over the recent decades, with growing implications for the livelihoods of local fishing communities, various industries, coastal regulators, and those operating in the environment. This impacts operations such as mine, small scale inshore fishers significantly, both during the construction phases, and subsequently, forever changing the fishing ground, affecting species behaviour often in a manner that will destroy the local fishery.</p>	<p>For clarity, this Foreshore Licence application relates to proposed Site Investigation (SI) works only. These works are temporary and short term in nature. The ultimate project, the wind farm itself or any laying of underwater cables, will be the subject of a full consent application/applications in due course and is outside the scope of this application. This initial stage in the overall development process is focussed on the undertaking of SI works only in order to inform ongoing feasibility assessments for the development, the overall design of the potential wind farm and to inform the completion of an EIAR and NIS which will also address the impacts of the construction and operational stages of any proposed wind farm that will accompany any future consent application. In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks. Additionally, ESB is developing a Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment, and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p>
<p>The survey area marked out in the document available for inspection is indicative of my fishing ground. The ground in question is a recognised commercially exploited place of work and I have concerns regarding over exposure and continual disturbance of stocks and potential to create intensive disruptions to the seabed; the impact of continued large scale investigations on the fish stocks; and concerns around possible impact of use of ultra-high resolution seismic survey on stocks are all valid worries I have about the future of fishing in the area.</p>	<p>ESB will conduct site investigation (SI) activities and wish to further reinforce that these shall be short term and temporary in duration, and that based on the information provided below the effects on fish species from underwater noise generated from the SI activities on fish is therefore considered minor. Most fish species are not sensitive to noise as they are not able to detect frequencies above 1500hz which the majority of the proposed survey equipment operates above. For low frequency producing noise, including those produced from drilling and Ultra High Resolution Seismic (UHRS) survey equipment, noise may be detected by fish species. However, the sound pressure levels that would be detected would likely be low due to noise attenuation through the water column resulting in potential behavioural effects, such as startle responses, feeding disruption, area avoidance, rather than any physiological effects. The area in which the effects would be observed would also be localised and any effects temporary in duration. On cessation of activities any behavioural effects observed would dissipate over a brief period of time. Acknowledging that there is the potential for temporary changes in the behaviour of the fish species, resulting from the impact of underwater</p>

	<p>noise, it is considered likely that such temporary changes in the behaviour of fish would be minor and not result in significant effects on their survival including feeding, breeding, and migration through the Licence area.</p> <p>The Project will also comply with mitigation measures such as ramp-up procedures as recommended in the Guidance to manage the risk to marine mammals from man-made sound sources in Irish waters (DAHG, 2014)¹. A ramp-up/soft start procedure is the gradual ramping up of power over a set period of time with the aim to deter animals from the area before the full volume is reached so that noise exposure and the risk of potential injury are reduced. It should be noted that not all equipment has this capability inbuilt therefore the ramp-up procedure will be followed if the equipment has the capacity to do so. The expected fleeing behaviour of fish from the area affected when exposed to high levels of noise and the soft start procedure employed will ensure that fish have sufficient time to vacate the areas where they may be affected prior to noise levels reaching maximum level. Fleeing behaviour would be short term and temporary and effects considered minor.</p>
<p>I am an inshore fisherman who has fished these waters for over 25 years. I make my living in the Cork harbour area and beyond up to the 12-mile limit. My catch is seasonal, concentrating on potting for lobster, shrimp, and crab and using lines to catch mackerel, pollock, cod, ling and skate when in season. I fish sustainably and supply locally and this development directly threatens my livelihood and my work space and I would like to object to the current proposal under the following grounds:</p> <ol style="list-style-type: none"> 1. Access: The planned survey causes disruption to the local fishing industry, especially in terms of access to the area. I am concerned about exclusion zones both during and after the survey, within and outside the harbour, limiting fishing grounds and access to the areas I pot in. I am concerned that I may find that my access to certain areas is restricted or excluded from them. 2. Demand for Local Catch: As the surveys are being conducted, this can limit access to certain fishing sites and resources, local demand for the catch will be reduced. I may be forced to seek alternative locations to fish that are further away, resulting in labour and transportation costs that can not only decrease the profit margin of my catch but also increase my hours of work. 3. Loss of Income: I ask you to consider the negative economic implications for fishers and their families should they not be able to go to work due to this development. <p>Trusting the balancing of rights will endure and careful consideration of the right to earn a living and the right to protect our environments from all harm, that all stakeholders viewpoints will be considered, including those who have used the area to earn a living for decades.</p>	<p>In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks. Additionally, ESB is developing a Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment, and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p> <p>Fishers are key stakeholders in any of ESB's offshore wind farm proposals and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and also in the minimisation of risk to both parties.</p> <p>An Offshore Wind Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer (FLO) have been appointed to support the project, and they have been actively engaging with the commercial fishing industry on a face-to-face basis and also in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project.</p>

¹ DAHG. 2014. Guidance to manage the risk to marine mammals from man-made sound sources in Irish waters. [Underwater sound guidance Jan 2014.pdf \(npws.ie\)](https://www.npws.ie/~/media/2014/01/Underwater_sound_guidance_Jan_2014.pdf)

Submission 2: Wild Ireland Defence

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>We believe and so submit that it is singularly impossible to conduct any form of Environmental Assessment in relation to this Project either in accordance with the Habitats Directive, the Birds Directive or the EIA Directive of the European Union without also considering all adjacent and overlapping Wind Energy Projects proposed and/or in respect of which Ministerial Consent is sought along the coastline between Old Head of Kinsale and Carnsore Point, regardless whether those Plans and/or Projects are sought to be consented to and implemented inside of the Baseline and within the Internal Waters of the State or whether those Plans and/or Projects are sought to be consented to and implemented outside of the Baseline within the Territorial Waters of the State, or otherwise.</p>	<p>ESB has assessed the implications of the proposed SI works within and outside of the foreshore area both individually and in combination with other plans and projects (including adjacent and overlapping Wind Energy Projects), against the conservation objectives of the European Sites referenced in the Natura Impact Statement (NIS) and have concluded that following application of suitable mitigation measures the proposed SI works will not adversely affect the integrity of the sites concerned. It is worth noting that the proposed works are temporary and short term in nature.</p> <p>In accordance with the Habitats Directive, potential impacts on habitats and species associated with European Sites have been addressed in the NIS and potential impacts on Annex IV species have been addressed in the Annex IV Risk Assessment which have been submitted as part of this foreshore licence application.</p>
<p>On Page 45 of the Celtic Offshore Wind Site Investigation “non-statutory Environmental Report” we are told that the Projects listed in Table 8-1, running from page 46 – 48 and including Geophysical, Geotechnical, Archaeological, Ecological, Oceanographic, Meteorological and Environmental investigations that seek to acquire, amongst other information, baseline data to allow cable design and the development of cable installation methodologies, to acquire baseline data to optimise the wind farm layout design and finalise offshore foundation locations, to acquire baseline data on the wind resource and baseline information for environmental studies of the area (of proposed Wind-farm Installations and sub-sea Cabling to take Electricity derived from a significant number of Wind Energy Projects to Shore.</p> <p>Meanwhile the Non-Statutory Environmental Report being a Report to Accompany Foreshore Licence Application for Site Investigation Works in a Submission to the Department of Housing, Local Government & Heritage, Document No.: QS-000316-01-R460-003-000 and dated August 2022, prepared by ESB Engineering & Major Projects, One Dublin Airport Central, Dublin Airport, Cloughran, Co. Dublin, Ireland advises the Consenting Authority and the Public that “the proposed project impacts have been identified as highly localised and of temporary duration. It is therefore considered that cumulative impacts are likely to be minor.”</p> <p>Meanwhile on Page 50 of that Non-Statutory Environmental Report we are advised that ESB Engineering & Major Projects, on behalf of the ESB Wind Development Limited, have concluded that the works envisaged and as described in the Application when taken “alone and cumulatively with other proposed projects are not anticipated to result in any significant effects on the environment and are both short term and temporary in nature.” With all due respects to the Applicant and to ESB Engineering & Major Projects, we submit that this cannot possibly be a correct assumption to have made having regard to the</p>	<p>ESB is proposing to conduct Geophysical, Geotechnical, Archaeological, Ecological, Oceanographic, Meteorological and Environmental investigations. These works will be short term and temporary in duration and have been assessed in accordance with the Habitats Directive both alone and cumulatively with other projects and plans.</p> <p>The screening for appropriate assessment concluded that Likely Significant Effects (LSE) could not be excluded for all the Qualifying Interests (QIs) of all the relevant European Sites as a result of the SI works. The report concluded that LSE could not be ruled out for European Sites as a result of site investigation works alone or in-combination with other projects (without mitigation) in terms of effects on water bird species associated with Cork Harbour SPA, Ballycotton Bay SPA, Ballymacoda Bay SPA, Sovereign Island SPA.</p> <p>No LSE was identified for marine mammal designated features of the 14 SACs however they were still brought forward for NIS to account for the mitigation measures that will need to be implemented to negate non-significant effects of underwater noise during the surveys and additionally there were no LSE identified for designated benthic habitats or Annex II diadromous fish receptors.</p> <p>The NIS concluded that following application of suitable mitigation measures the site investigation work, either alone or in-combination with other plans or projects, will not have an adverse effect on the integrity of any Natura 2000 site that was identified as part of the screening phase.</p> <p>The proposed SI works, alone and in-combination with other projects and plans, have been assessed in Section 4.2 of the Supporting Information: Screening for Appropriate Assessment (SISAA) Report and Section 3 of the NIS.</p>

<p>content of the Applicant’s own “SCREENING FOR APPROPRIATE ASSESSMENT REPORT” - Application No. FS007138 dated the 29th November 2022 where on Page 29, following on a recitation in a number of preceding paragraphs that the possibility of likely significant effects as a result of the proposed project within the Zone of Influence of the proposed Project cannot be excluded.</p>	
<p>We are then advised at Paragraph 3.4.3 on “In-combination effects” that in a search of the Department’s Foreshore applications web site on the 11th of November 2022, a number of Foreshore applications were identified which may have potential to have in-combination effects with the proposed project (table 7). Of identified projects only those which have a temporal overlap with the proposed project are likely to have in-combination effects. Such effects, depending on the project, are likely to include all or some of the following effects – above water noise disturbance, under water noise disturbance and visual disturbance</p> <p>With all due respects to the Applicant, it cannot possibly be the case that only proposed Wind Energy Projects which have a temporal overlap with the proposed (ESB) Project are likely to have in-combination effects. Having regard to the fact that the Site of the proposed Project and the Site of the proposed Geophysical and Geotechnical Investigations lies directly in the migratory path of a number of species, including highly protected species of, for example, Whales, Dolphin and other species that are so protected in accordance with the EU’s Habitats and Birds Directives and, having regard to the fact that by the ESB’s own admission, a significant number of Fish Species will have their Nursery and Spawning habits and Habitats significantly interfered with as a result of the ‘works’ proposed by the ESB and by ‘works’ proposed to be conducted by a number of other Wind Energy Companies along the coast of Counties Cork, Waterford and Wexford, it is patently the case that no proper Assessment can be performed absent consideration of the “in combination affects” between the ESB Project and the Projects listed in the following paragraphs</p> <p>The paragraphs to which we refer above are then recite as follows: As stated in Section 1.1 ESB Wind Development Ltd. propose to carry out site investigations in an adjacent area identified for future floating offshore wind in the Celtic Two project. The applicant’s Supporting Information Screening for Appropriate Assessment report (SISSA) states that their screening for Appropriate Assessment includes the Celtic Two area, however as this area is outside the foreshore licence jurisdiction no details of the proposed site investigation have been provided to the Department and as such this Screening for Appropriate Assessment only takes account of the Celtic One Site investigations. The Celtic Two project and associated site investigations are considered to have in-combination effects if they overlap temporally. Based on insufficient clarity on when the survey/works will be carried out and using the precautionary principle the following projects are considered to have in-combination effects with the proposed project:</p>	<p>ESB considered the cumulative impacts of the project in association with other projects and plans identified at the time of writing and noted that a number of the projects had the potential to cause similar effects on the identified sensitive receptors associated with the proposed survey site investigations.</p> <p>Given the extremely localised and short duration nature of the proposed site investigation work, it is considered that there is negligible potential for in-combination effects on the marine mammal QIs of the relevant sites. Where routes to impact have been identified, and under a precautionary approach, it is still considered that any potential effects are so negligible in scale that no potential for in combination effects with any other relevant plans or projects exists.</p> <p>The NIS concluded no LSE due to any potential effects (auditory injury) for all marine mammal features of all relevant identified SACs for the Project, in combination with other Plans/projects. However, with due regard to the precautionary principle there is a potential for pressure on the QIs of the 14 relevant SACs during the start-up of survey geophysical equipment. Therefore, the surveys will comply with mitigation measures regarding pre-start monitoring and ramp-up as recommended in the guidance (DAHG, 2014) to eliminate the potential for pressure.</p> <p>Regarding fish species most are not sensitive to noise as they are not able to detect frequencies above 1500hz which the majority of the proposed survey equipment operates above. For low frequency producing noise, including those produced from drilling and Ultra High Resolution Seismic (UHRS) survey equipment, noise may be detected by fish species. However, the sound pressure levels that would be detected would likely be low due to noise attenuation through the water column resulting in potential behavioural effects, such as startle responses, feeding disruption, area avoidance, rather than any physiological effects. The area in which the effects would be observed would also be localised and any effects temporary in duration. On cessation of activities any behavioural effects observed would dissipate over a brief period of time. Acknowledging that there is the potential for temporary changes in the behaviour of the fish species, resulting from the impact of underwater noise, it is considered likely that such temporary changes in the behaviour of fish would be minor and not result in significant effects on their survival including feeding, breeding, and migration through the Licence area.</p> <p>As mentioned previously the Project will also comply with mitigation measures such as ramp-up procedures. A ramp-up/soft start procedure is the gradual ramping up of power over a set period of time with the aim to deter animals from the area before the full volume is reached so that noise</p>

<p>☐ Site Investigations for ESB Celtic Two – offshore floating wind project adjacent to, but outside 12nm limit, of this application (FS007138).</p> <ul style="list-style-type: none"> • FS007354 Kinsale Offshore Wind Ltd., site Investigations for offshore wind. • FS006916 EirGrid Celtic Interconnector Electricity Cable. • FS007404 Inis Ealga Marine Energy Park (IEMEP) site investigations for offshore wind. • FS007139 Simply Blue Emerald Site Investigations for site Investigations for offshore wind. 	<p>exposure and the risk of potential injury are reduced. It should be noted that not all equipment has this capability inbuilt therefore the ramp-up procedure will be followed if the equipment has the capacity to do so. The expected fleeing behaviour of fish from the area affected when exposed to high levels of noise and the soft start procedure employed will ensure that fish have sufficient time to vacate the areas where they may be affected prior to noise levels reaching maximum level. Fleeing behaviour would be short term and temporary and effects considered minor.</p> <p>ESB would also like to clarify that it has not been stated in the associated foreshore licence application reports that the site investigation works will have a significant impact or interfere with fish species and their nursery and spawning habitats.</p>
<p>We submit that it is IMPOSSIBLE to conduct any form of Appropriate Assessment of the Environmental effects of all of these Projects unless and until a Cumulative Assessment is conducted on ALL Projects that are proposed and whereby the Environmental Impacts of all Projects are assessed together</p> <p>We believe and so submit that failure to conduct an Assessment of all such Plans and Projects together with the cumulative impacts of all such Projects being assessed both on their own and in combination with each other and both in waters within the Baseline, in the Internal Waters of the State and in waters outside of and without the Baseline in the Exclusive Economic Zone and Exclusive Fishery Limits of the State represents an abject failure to comply with the requirements of both Habitats and Birds Directives of the EU and Article 6.3 and the Caselaw governing application of Article 6.3 and 6.4 of the ECJ</p>	<p>ESB respect the concerns raised however believes that the assessments conducted associated with the Site Investigation works, identified in the accompanying Supporting Information: Screening for Appropriate Assessment and NIS documents are in line with the Department of Environment, Heritage and Local Government (DEHLG), Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities (DEHLG, 2010) and that the assessment have been carried out under Article 6(3) of the Habitats Directive regarding the implications of a plan or project, either individually or in-combination with other plans and projects, on a Natura 2000 site in view of the site’s conservation objectives (DEHLG, 2010).</p> <p>ESB has undertaken an assessment of the SI works alone and in-combination with other plans and projects (refer to Section 4.2 of the Supporting Information: Screening for Appropriate Assessment (SISAA) Report and Section 3 of the NIS) as per the requirements of the Habitats Directive.</p>

Submission 3: Fishers

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>This application is made by a family of fishermen that have worked the area concerned for many years.</p> <p>We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.</p> <p>This stretch of coastline has, and continues to provided livelihoods, employment , as well as top quality , low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.</p> <p>The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well all other members of the fishing community's on the south coast. These effects which are detrimental to the health to fish/shellfish stocks are well documented.</p> <p>This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors .</p> <p>I personally fish crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.</p> <p>Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.</p> <p>Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.</p> <p>Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the applicant.</p>	<p>In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks.</p> <p>Additionally, ESB is developing a Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment, and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p> <p>Fishers are key stakeholders in any of ESB's offshore wind farm proposals and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and also in the minimisation of risk to both parties.</p> <p>An Offshore Wind Stakeholder Manager, a Community Liaison Officer, and a Fisheries Liaison Officer (FLO) have been appointed to support the project, and they have been actively engaging with the commercial fishing industry on a face-to-face basis and also in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project.</p>

Submission 4: Fishers

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>This application is made by a family of fishermen that have worked the area concerned for many years.</p> <p>We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.</p> <p>This stretch of coastline has, and continues to provided livelihoods, employment, as well as top quality, low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.</p> <p>The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well all other members of the fishing community's on the south coast. These effects which are detrimental to the health to fish/shellfish stocks are well documented.</p> <p>This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors .</p> <p>I personally fish crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.</p> <p>Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.</p> <p>Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.</p> <p>Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the applicant.</p>	<p>In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks.</p> <p>Additionally, ESB is developing Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p> <p>Fishers are key stakeholders in any of ESB's offshore wind farm proposals and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and in the minimisation of risk to both parties.</p> <p>An Offshore Wind Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer (FLO) have been appointed to support the project, and they have been actively engaging with the commercial fishing industry on a face-to-face basis and in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project.</p>

Submission 5: O Donovan seafoods - Fishers

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>This application is made by a family of fishermen that have worked the area concerned for many years.</p> <p>We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.</p> <p>This stretch of coastline has, and continues to provided livelihoods, employment, as well as top quality, low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.</p> <p>The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well all other members of the fishing community's on the south coast. These effects which are detrimental to the health to fish/shellfish stocks are well documented.</p> <p>This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors.</p> <p>I personally fish in excess of 1500 crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.</p> <p>Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.</p> <p>Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.</p> <p>Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the applicant.</p>	<p>In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks.</p> <p>Additionally, ESB is developing Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p> <p>Fishers are key stakeholders in any of ESB's offshore wind farm proposals and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and in the minimisation of risk to both parties.</p> <p>An Offshore Wind Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer (FLO) have been appointed to support the project, and they have been actively engaging with the commercial fishing industry on a face-to-face basis and in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project.</p>

Submission 6: O Donovan seafoods - Fishers

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>I wish to make an objection for the following reasons. I hope you take them into consideration.</p> <p>I am an inshore fisherman from Cork Harbour, for over 25 years. The planned survey area as marked out in the document available for inspection is where my main fishing grounds are.</p> <p>I fish for shrimp in the winter months, and for whitefish and shellfish during the spring spawning grounds for whitefish, lobster and shrimp. These species make up my main source of income.</p> <p>The planned survey will cause disruption to the local fishing industry, especially in terms of access. I am very concerned that my access to said area would be restricted or maybe excluded from these fishing grounds. This in turn will have a negative economic implication for me, ie. Loss of income</p>	<p>In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks.</p> <p>Additionally, ESB is developing Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p> <p>Fishers are key stakeholders in any of ESB's offshore wind farm proposals and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and in the minimisation of risk to both parties.</p> <p>An Offshore Wind Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer (FLO) have been appointed to support the project, and they have been actively engaging with the commercial fishing industry on a face-to-face basis and in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project.</p>

Submission 7: Inshore Fishers

ESB notes the points raised in this submission. A response to the comment is provided in the table below.

Submission Comments	ESB Response
<p>This application is made by a family of fishermen that have worked the area concerned for many years.</p> <p>We ask you to assess this application in light of the constitutional right of the fisherman engaged in fishing this area listed under article 11 of bunreacht na hEireann, as well as the obligation of the state not to grant license/lease or demise which does not take into account and consideration valid public interests.</p> <p>This stretch of coastline has, and continues to provided livelihoods, employment , as well as top quality , low carbon and secure food source which given recent global events cannot be allowed to be destroyed by uncontrolled offshore development.</p> <p>The effects of the surveys involved in ORE development on fish and shellfish stocks are of grave concern to me as well all other members of the fishing community's on the south coast. These effects which are detrimental to the health to fish/shellfish stocks are well documented.</p> <p>This particular survey/ development is located in areas of key importance including spring spawning grounds for whitefish, autumn spawning grounds of the Celtic sea herring stocks as well as areas of vital importance to the inshore fleet and pot fishing sectors .</p> <p>I personally fish in excess of 1500 crab / lobster pots and any such survey activity in the area listed for the offshore array as well as the proposed cable routes has the potential to be extremely detrimental for both stocks, as well as my companies/ vessels earning potential and ability due to restrictions or activities involved in survey operations that limit access to fishing grounds.</p> <p>Any license granted to the applicants should be sure to stipulate the financial mitigation of any losses and / or potential future losses due to lasting damage to stocks / earning potential.</p> <p>Any license granted to the applicant should also stipulate full compliance with guidelines set as out by ORE / seafood working group to ensure clear and comprehensive notification/communication is provided prior to any works.</p> <p>Any decision/ license granted should not come at a total cost or risk of loosing many years of hard work building a business for the total gain / profit of the applicant.</p>	<p>In line with the Summary Guide on Seafood/ORE Engagement in Ireland, ESB is committed to working with individual fishers and also with their representative Fish Producer Organisations and Inshore Fisheries Forums with the objective of ensuring that as many fishers as possible are made aware of our proposals, and also that survey activities can be completed safely and without damage to fishing gear, survey equipment or vessels and without long-term damage to fish and/or crustacean stocks.</p> <p>Additionally, ESB is developing Commercial Fisheries Stakeholder Engagement Plan and has committed to sharing that with the Fish Producer Organisations as well as with NIFA and NIFO for review, comment and input with a view to having a Plan in place which would be acceptable to both interests. It will outline how ESB plans to engage with commercial fishers about the Celtic project throughout the project's life cycle – from initial assessment, through construction, into operation. It will also take cognisance of the Summary Guide mentioned above.</p> <p>Fishers are key stakeholders in any of ESB's offshore wind farm proposals and ESB is keen to ensure there are mutual benefits from the development of this project. Shared understanding will be essential in achieving this and in the minimisation of risk to both parties.</p> <p>An Offshore Wind Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer (FLO) have been appointed to support the project, and they have been actively engaging with the commercial fishing industry on a face-to-face basis and in written correspondence, as well as with the local councils and locally elected representatives. ESB intends to continue this engagement with the fishing community throughout the duration of the project.</p>