Chuig: Marine Planning Policy and Development, Department of Housing, Planning and Local Government, Newtown Road, Wexford, Co Wexford or foreshore@housing.gov.ie.

Seoltadh ag: [redacted]

Data: 23/02/2020

Tag: Foreshore Licence Application FS007016 as notified on https://www.housing.gov.ie/deep-sea-fibre-networks-ltd

A chara,

The following submission is made in good faith, in the interest of proper planning and sustainable development. In light of the current ecological emergency and dire state of our common home it is crucial that the authorities with statutory responsibilities and the expertise in planning and environmental assessments assure the public that all planning applications are subject to robust environmental assessments, rooted in the precautionary principle and providing the highest environmental protection possible, in full compliance with all relevant legislation.

Please acknowledge receipt of this submission and keep me updated (via email) of this application's progress.

It is submitted that Foreshore Licence Application FS007016 made to the DHPLG (https://www.housing.gov.ie/deep-sea-fibre-networks-ltd) relating to the proposed subsea fibre optic cable project from a landfall in Galway to landfall in Iceland traversing Galway Bay may not be consented in compliance with legislation for the following reasons:

1. Incorrect Planning Consent Procedure

The proposed development correctly falls to An Bord Pleanála (ABP) for planning and environmental consent determinations since the project in question involves infrastructure that has significant effect in the planning area of i) Galway County Council *and* ii) The Department of Housing, Planning and Local Government.

2. Project Splitting

The objectives of the Aarhus Convention and the purpose of the EIA Directive have been circumvented by the practice of Project Splitting in relation to the proposed development. The planned project noted in the application is to construct a new sub-sea telecoms cable system, IRIS, linking Iceland to Ireland, from a landfall on the Reykjanes Peninsula to a landfall on the west coast of Ireland. However, no description of the land-based element of the proposed project in Galway has been submitted for assessment with this Foreshore Licence application. In addition, the proposed survey is presented to the public as a project in itself, completely divorced from the proposed actual cable laying project, for which a Foreshore Licence is yet to be sought. It is logical, and in line with the precautionary principle, to consider the proposed survey as an intrinsic element of the proposed IRIS cable laying project. Environmental assessment of the proposed survey separate and split from i) the actual proposed 'IRIS' cable

laying element of the project, and ii) the land based element of the proposed telecoms project, circumvents the EIA Directive and the public's rights under the Aarhus Convention.

3. EIA Screening

The proposed project requires screening under the provisions of the EIA Directive in light of the significant effects on the environment noted in the application.

4. Birds & Habitats Directives

It is essential that the relevant authorities ensure that the State's obligations in the protection of all habitats and species protected under the Birds and Habitats Directives are fully satisfied. In light of the recent alarming findings of (i) 'The Status of EU Protected Habitats and Species in Ireland' (DCHG, 2019) and (ii) The UN Global Assessment by the IPBES (2019), it is imperative that Competent Authorities ensure that planning applications and consents strictly adhere to environmental regulations, legislation and to the Precautionary Principle in order to halt the rapid catastrophic decline in nature that threatens wildlife extinction. Both the above noted reports highlight the extent and rate of the national and global extinction crisis. Below are extracts from both reports:

I. *"A new report from the Department of Culture Heritage and the Gaeltacht on the status of our most valuable habitats and species paints a dire picture for biodiversity in Ireland and once again stresses the depth of the extinction crisis here" (Irish Wildlife Trust; Available at: https://iwt.ie/press-release-new-report-highlights-the-extent-of-the-irish-extinction-crisis/)*

II. *"The UN Global Assessment by the IPBES (2019) reports an alarming and unprecedented rate of decline in nature and an accelerating rate of species extinctions.*

PARIS, 6 May – Nature is declining globally at rates unprecedented in human history – and the rate of species extinctions is accelerating, with grave impacts on people around the world now likely, warns a landmark new report from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), the summary of which was approved at the 7th session of the IPBES Plenary, meeting last week (29 April – 4 May) in Paris.

"The overwhelming evidence of the IPBES Global Assessment, from a wide range of different fields of knowledge, presents an ominous picture," said IPBES Chair, Sir Robert Watson. "The health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide."

"The Report also tells us that it is not too late to make a difference, but only if we start now at every level from local to global," he said. "Through 'transformative change', nature can still be conserved, restored and used sustainably – this is also key to meeting most other global goals. By transformative change, we mean a fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values."

"The member States of IPBES Plenary have now acknowledged that, by its very nature, transformative change can expect opposition from those with interests vested in the status quo, but also that such opposition can be overcome for the broader public good," Watson said."

(Available at: https://www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/)

5. Appropriate Assessment (AA)

The public are effectively excluded from providing any observation in relation to the Appropriate Assessment Screening Determination made by the Competent Authority, since this information is absent from the Foreshore Licence application presented to the public for consultation.
The Natura Impact Statement (NIS) submitted by the applicant is not based on the precautionary principle nor demonstrate with the required certainty, the absence of adverse effects; the NIS is limited and contains errors; European Sites along the route of the proposed survey have been excluded in error; habitats and species have been screened out of the NIS in error; insufficient detail in relation to the whole project and cumulative effects have been provided which would enable the Competent Authority to make a AA determination compliant with case law (e.g. C-258/11, C-164/17, C-127/02, C-243/15, C-387/15, C-388/15, C-157/96, C-127/02, C-441/17, C-323/17, C-461/17).

Is mise,

[redacted]

A Chara,

We are concerned about the proposed Cable route survey and site investigation FS007016.

The map and co-ordinates outlining this survey was only recently brought to my attention by another concerned fisherman.

As a licenced and active fishing family in the area surrounding the Aran Islands, I believe that this survey is the ground-works for future development that will severely impact the fishing grounds surrounding the Aran Islands and as a result impact my livelihood.

The Public Consultation in the form of a Notice Application for a Foreshore Lease/Licence printed in the Connacht Tribune and the Irish Examiner on the 24/01/2020 was very misleading. Misleading due to the address in the application being Ballyloughane Strand, Renmore, Co Galway. There was no mention of the Aran Islands in the proposed Cable route survey and site investigation in the printed Notice Application.

This Public Notice should have been accompanied by the map showing the Aran Islands encircled in red. It should also have been printed in the national marine papers as this would have reached the specific affected public.

There is currently uproar among the fishermen and Islanders on the three Islands.

Le meas,

[redacted]

To Whom it concerns

We [redacted] wish to object to the foreshore application FS007016 submitted by Deepsea Fibre Networks Limited in Galway bay and south of the Aran Islands dated 24/01/2020

We are second and Third generation fishermen who have fished Galway bay and Aran grounds all our lives,we own the [redacted].She is a trawler,scalloper which operates from Rossaveel.

The proposed survey location in Galway Bay and south of the Aran Islands is of great concern to us as section A, B and C run right through the middle of our fishing grounds where we have fished traditionally for prawns , whiting, haddock, cod,squid,pollock and scallops amongst other species we are concerned that sea bed samples and the required survey work could interfere with the breeding and spawning of the above mentioned species. As most of us involved in the industry known Galway bay and surrounding area is documented as a nursery area to several important fish species and crustaceans

We are also concerned about interference with fishing activities during the survey not being able to trawl in certain area's where fish congregate on an annual basis would result in a much needed loss of revenue.

Regards
[redacted]

To Whom it concerns

We [redacted] wish to object to the foreshore application FS007016 submitted by Deepsea Fibre Networks Limited in Galway bay dated 24/01/2020

We are second and Third generation fishermen who have fished Galway bay all our lives,we own the [redacted].She is a static gear vessel fishing creels and gill nets which operates from Rossaveel.

The proposed survey location in Galway Bay is of great concern to us as section B and C run right through the middle of our fishing grounds where we have fished traditionally for shrimp, prawns , crab, lobster, crayfish,whiting,pollock amongst other species we are concerned that sea bed samples

and the required survey work could interfere with the breeding and spawning of the above mentioned species.As most of us involved in the industry known Galway bay is documented as a nursery area to several important fish and crustaceans

We are also concerned about interference with fishing activities during the survey operation where gear might not be accessible for retrieval when relevant to do so,with recent weather patterns only a short weather window can exist at times to recover gear and failure to do so could result in lost gear and revenue.

Regards

[redacted]

Marine Planning and Foreshore Section,

Department of Housing,

Planning and Local Government,

Newtown Road,

Wexford,

Co. Wexford.

Planning Application Reference Number: FS007016

Applicant: Deep Sea Fibre Networks Ltd

Description of Development: Cable route survey and site investigations for a proposed subsea fiber optic cable

Location: Ballyloughane Strand, Renmore, Co. Galway

To Whom it Concerns,

I refer to the above planning application & wish to make the following submission in relation to the same.

I am making this response as a person directly dependant on a Commercial Inshore Fishing Enterprise, and am concerned the project outlined will impact negatively on this enterprise.

- As a member of the Inshore Fishing Sector I'm deeply disappointed that there was NO consultation with the sector and its representatives, by the applicant, at the pre application stage. This is in spite of the guidelines published on your website.
- Based on my personal experience, the level of Inshore Fishing activity described in the application is grossly under estimated.
- I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, for my livelihood. The fishing operation I depend on, operates in the following areas, at the following times, for the following species, fishing by means of the following methods, and I fear the proposed works will prevent or disrupt it from doing the same

- Operating in the area roughly bound by the following latitude and longitude coordinates
53° 10' N 3 9° 05 W.
53° 16' N 3
USING DREDGE AT DIFFERENT LOCATIONS THROUGHOUT THE YEAR WITHIN THE ABOVE AREA.

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish~~/whitefish~~/bi valve mollusc/~~whitefish/pelagic fish~~, other species, during the months of January – December.

By means of *(cross out as appropriate)* ~~pots/static nets/demersal trawl/mid water trawl~~/bottom dredge/~~hooks and lines/other~~.

- Operating in the area bound by the following latitude and longitude coordinates

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/bi valve mollusc/~~whitefish/pelagic fish~~, other species, during the months of January – December.

By means of *(cross out as appropriate)* ~~pots/static nets/demersal trawl/mid water trawl~~/bottom dredge/~~hooks and lines/other~~

- Operating in the area bound by the following latitude and longitude coordinates

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/whitefish/bi valve mollusc/whitefish/pelagic fish, other species, during the months of _____

By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other

Outside of the specific areas in which this enterprise fishes, it is reliant on others areas covered by the application for safe navigational passage to and from the fishing grounds to the following safe harbours _____

I would also like to raise the following points:

I FISH FOR Clams Year Round, and Have done for 22 years. The method I use is Totally Sustainable. Our fishing provides for Two Family's mine and my sons. We Have worked Hard to Develope our Fishery and are concerned about our good work being undone.

Marine Planning and Foreshore Section,

Department of Housing,

Planning and Local Government,

Newtown Road,

Wexford,

Co. Wexford.

Planning Application Reference Number: FS007016

Applicant: Deep Sea Fibre Networks Ltd

Description of Development: Cable route survey and site investigations for a proposed subsea fiber optic cable

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- Based on my personal experience, the level of Inshore Fishing activity described in the application is grossly under estimated.
- I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, for my livelihood. The fishing operation I depend on, operates in the following areas, at the following times, for the following species, fishing by means of the following methods, and I fear the proposed works will prevent or disrupt it from doing the same

- Operating in the area roughly bound by the following latitude and longitude coordinates

53° 16' N } 9° 10' W.
53° 10' N }

LIABLE TO BE WORKING AT ANY POSITIONS WITHIN THE ABOVE BOX THROUGHOUT THE YEAR.

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/bi valve mollusc/~~whitefish/pelagic~~ fish, other species, during the months of JAN - DECEMBER INCLUSIVE

By means of *(cross out as appropriate)* pots/static nets/~~demersal trawl/mid water trawl~~/bottom dredge/~~hooks and lines/other~~

- Operating in the area bound by the following latitude and longitude coordinates

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/bi valve mollusc/~~whitefish/pelagic fish~~, other species, during the months of JAN — DEC. Inclusive

By means of *(cross out as appropriate)* pots/static nets/~~demersal trawl~~/~~mid water trawl~~/bottom dredge/~~hooks and lines/other~~

- Operating in the area bound by the following latitude and longitude coordinates

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/whitefish/bi valve mollusc/whitefish/pelagic fish, other species, during the months of _____

By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other

Outside of the specific areas in which this enterprise fishes, it is reliant on others areas covered by the application for safe navigational passage to and from the fishing grounds to the following safe harbours Galway Harbour + Rinville, Elsewhere

I would also like to raise the following points:

Static gear is the main type of gear (pots + creels) used in inner Galway Bay. I am very committed and guided by the green ethic in my fishing methods and I am totally committed to sustainability and proper stock and environmental management as are my colleagues working in the area. In 2018 (Nov.) we were presented with an award for our commitment to sustainability and for our innovative approach to management. I greatly fear that an unrelated enterprise would negatively impact on our many years of effort and negatively effect our incomes and our livelihoods, through environmental damage or disruption. I am sorely disappointed with the absence of direct consultation with inshore, local stakeholders in Galway Bay + environs.

Marine Planning and Foreshore Section,

Department of Housing,

Planning and Local Government,

Newtown Road,

Wexford,

Co. Wexford.

Planning Application Reference Number: FS007016

Applicant: Deep Sea Fibre Networks Ltd

Description of Development: Cable route survey and site investigations for a proposed subsea fiber optic cable

Location: Ballyloughane Strand, Renmore, Co. Galway

To Whom it Concerns,

I refer to the above planning application & wish to make the following submission in relation to the same.

I am making this response as a person directly dependant on a Commercial Inshore Fishing Enterprise, and am concerned the project outlined will impact negatively on this enterprise.

- As a member of the Inshore Fishing Sector I'm deeply disappointed that there was NO consultation with the sector and its representatives, by the applicant, at the pre application stage. This is in spite of the guidelines published on your website.
- Based on my personal experience, the level of Inshore Fishing activity described in the application is grossly under estimated.
- I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, for my livelihood. The fishing operation I depend on, operates in the following areas, at the following times, for the following species, fishing by means of the following methods, and I fear the proposed works will prevent or disrupt it from doing the same

- Operating in the area roughly bound by the following latitude and longitude coordinates

  9° 35' + 53° 14' 10° 15' + 52° 45'

  10° 30 + 53° 30

  9° 20' + 53° 10'

  9° 30 + 52° 46'

  The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/whitefish/bi valve mollusc/whitefish/pelagic fish, other species, during the months of March to November

  By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other.

- Operating in the area bound by the following latitude and longitude coordinates

  The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/whitefish/bi valve mollusc/whitefish/pelagic fish, other species, during the months of _____

  By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other

- Operating in the area bound by the following latitude and longitude coordinates

  The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/whitefish/bi valve mollusc/whitefish/pelagic fish, other species, during the months of _____

  By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other

Outside of the specific areas in which this enterprise fishes, it is reliant on others areas covered by the application for safe navigational passage to and from the fishing grounds to the following safe harbours Rossaveal, Kilronan, Kilronan.

I would also like to raise the following points:

I am not opposed to developments within my working area but it would be preferable if the proposers sat down with the industry at an early stage + openly inform us of their plans. By not consulting with the fishing industry the proposer's actions insinuate suspicion. I am in favour of green energy initiatives + the proposer may well discover that it benefits the proposal to learn from the people who operate within the area.

Marine Planning and Foreshore Section,

Department of Housing,

Planning and Local Government,

Newtown Road,

Wexford,

Co. Wexford.

Planning Application Reference Number: FS007016

Applicant: Deep Sea Fibre Networks Ltd

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- As a member of the Inshore Fishing Sector I'm deeply disappointed that there was NO consultation with the sector and its representatives, by the applicant, at the pre application stage. This is in spite of the guidelines published on your website.
- Based on my personal experience, the level of Inshore Fishing activity described in the application is grossly under estimated.
- I acknowledge that this application is for site investigation works, but I am concerned that these works will negatively affect the financial viability of the fishing enterprise I depend on, for my livelihood. The fishing operation I depend on, operates in the following areas, at the following times, for the following species, fishing by means of the following methods, and I fear the proposed works will prevent or disrupt it from doing the same

- Operating in the area roughly bound by the following ~~latitude and longitude coordinates~~

Throughout Inner Galway Bay.

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/whitefish/bi valve mollusc/whitefish/pelagic fish, other species, during the months of 12 MONTHS

By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other.

- Operating in the area bound by the following latitude and longitude coordinates

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/~~bi valve~~ mollusc/~~whitefish~~/pelagic fish, other species, during the months of 12 MONTHS

By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other

- Operating in the area bound by the following latitude and longitude coordinates

The fishing operation I'm dependant on, traditionally fishes for *(cross out as appropriate)* crustacean shellfish/~~whitefish~~/~~bi valve~~ mollusc/~~whitefish~~/pelagic fish, ~~other~~ species, during the months of

By means of *(cross out as appropriate)* pots/static nets/demersal trawl/mid water trawl/bottom dredge/hooks and lines/other

Outside of the specific areas in which this enterprise fishes, it is reliant on others areas covered by the application for safe navigational passage to and from the fishing grounds to the following safe harbours GALWAY HARBOUR, SPIDDAL, BARNA.

I would also like to raise the following points:

FIRST I HEARD OF THIS DEVELOPMENT WAS THROUGH THE N.I.F.A THERE WAS NO COMMUNICATION WHATSOEVER. CONTRARY TO THE INFORMATION PROVIDED BY THE APPLICANT THE AREA IS IN FACT OF CONSIDERABLE IMPORTANCE TO MANY DOZENS OF FISHING FAMILIES I AM INVOLVED IN POT FISHERIES FOR LOBSTER, SHRIMP, VELVET CRAB THROUGHOUT GALWAY BAY AND AM LIKELY TO BE HEAVILY IMPACTED BY THESE PROPOSALS

NIFA

www.inshore.ie

NIFO

nifa.secretary@gmail.com

nifo.secretary@gmail.com

Office Light,
Cahirciveen,
Co. Kerry,

10/02/20

To whom it may concern,

With reference to planning application reference number FS007016, by Deep Sea Fibre Networks Ltd., Ballyloughane Strand, Renmore, Co. Galway, regarding a cable route survey and site investigations for a proposed subsea fiber optic cable. The National Inshore Fishermen's Association (NIFA) and the National Inshore Fishermen's Organisation (NIFO) wish to make the following joint submission. Our members in the area have raised, what we feel are valid concerns regarding this application. This submission is based on the same, the main points being as follows

We note and commend the fact that DPHLG *"places a high priority on public participation during the assessment of foreshore applications"* (as published on your website) and that *"At pre-application stage, when the developer initially discusses the project with HPLG (Marine Planning and Foreshore Section), the developer is encouraged to engage in pre-application consultations with stakeholders".*

To the best of our knowledge there was no consultation between the developer and the Inshore Commercial Fishing sector to date. Pre application consultation appears to have been limited to State agencies and bodies. While NIFA and NIFO are the largest dedicated, National Inshore Fishing groups in the country, they are relatively new, however the Inshore Fisheries Forums www.inshoreforums.ie , the representative structures for the Inshore Fishing Sector (with whom we have a MOU) were established in 2014, and are now well established and recognized. The National Inshore Fisheries Forum (NIFF) is represented on the Marine Spatial Planning Advisory Group where its representatives meet along with a wide range of other stakeholders. Local, long established inshore fishing groups such as the Galway Bay Inshore Fishermen's Association are represented on the Western Regional Inshore Fisheries Forum (WRIFF). As stated above the rationale behind making this submission is that our embers have concerns, pre application consultation may have gone some way to alleviate them, had the developer carried it out. It is unfortunate to say in the least that they did not. This public consultation appears to be the only avenue available to voice these concerns.

The application fails to acknowledge Inshore fishing activity in the area of which there is much. Page 12 of the application only acknowledges that the survey route "may traverse fishing grounds (Aran Grounds) which presumable refers to the prawn ground south of the Aran Islands. Specific to the activity of our members, we have members fishing for shrimp, velvet/brown crab and lobster in inner Galway Bay but also extending along the proposed route of the cable out North of the Aran Islands to the South West of Lettermullan and along the southern proposed route West of the Clare coast. Our members would also operate static bottom set nets in the areas and proposed route traverses important scallop/prawn/ and whitefish grounds used by members of NIFO using various types of towed gear such as demersal trawls and scallop dredges.

While we appreciate this application is for site investigation works our members are concerned that these works will disrupt their fishing operations and this disruption will have a negative economic impact on them. We acknowledge that the applicant outlines an intention to engage a Fisheries Liaison Officer (FLO) prior to commencement of survey, however engaging one at pre application stage, would feel have been more favorable from our perspective. The further in advance of any survey that fishing operators are consulted and liaised with, the greater the opportunity to keep any disruption to a minimum is.

A number of our members have traditionally fished this area for years. Many with the previous generations also having fished in this specific area. This area accounts for a significant part of the economic return of these members operations. The site's proximity to shoreline allows them to operate in a degree of safety. That is something they could not find elsewhere within a realistic range of the landing sites they have traditionally used. They consider displacement of their operations out of this area, not to be economically viable and would be detrimental to their businesses. They operate with small vessels of around 6/10 meters overall length, which limits their operational range considerably. In many cases landing sites they traditionally use are not suitable for larger vessels. Scaling up the size of their vessels is not a realistic option for them, if they are to continue to operate from these sites, in the fisheries they are currently, and have been traditionally, involved in. Displacement further than to the area adjacent to the specific area, is not a realistic option for them.

Finally we thank the Department of Planning, Housing and Local Government for the opportunity to make this submission and we trust that it will be given the consideration it deserves.