



From: [REDACTED]
Sent: Saturday 12 February 2022 16:22
To: ORE Consenting
Subject: 'MAC Assessment Consultation'

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To whom it may concern I wish to make the following submission in relation to the Maritime Area Consent (MAC) under the Maritime Area Planning Act (MPA) 2021.

1) I very strongly object to any progression of any applications that may result in works being carried out in our Irish Marine Environment without the proper designation of Marine Protected Areas based on best scientific evidence. The State has failed to designate more than a minuscule portion of our Marine Environment as MPAs. It is absolutely premature to progress any Marine Windfarm investigative works or projects until suitable zones for development are clearly identified by the Government on our behalf based on up to date independent scientific expertise and evaluation. There is evidence that to date developers rather than the State have been permitted to lead site selection without environmental constraints.

2) It is unacceptable that legacy projects that made applications in the context of an outdated legal framework (1933 Legislation) will be given preferential status under the new 2021 legislation. These projects have not been evaluated based on the best scientific evidence available in 2022 regarding environmental impact and appropriate site selection.

3) While there is reference to ensuring that the legacy project developers are fit and proper "persons" there is no reference to the need to check their environmental credentials. It is crucial that before any permissions are granted, a developers credentials regarding their history of causing pollution and harm to the environment are thoroughly scrutinised by bodies with the expertise to do so on behalf of the public. There is some evidence that the track records of windfarm developers in terms of their care for the environment are questionable. Thorough oversight and ongoing monitoring of their activities by independent expertise is vital should they be permitted to progress any projects. Sadly this kind of monitoring was lacking in Derrybrien with detrimental consequences.

4) The State has not taken responsibility for ensuring adequate public awareness and consultation in the context of a Pandemic regarding the pros and cons of these near shore projects. There is evidence of a strong bias towards facilitating developers to fast track their legacy projects. While we do have to make progress urgently to address climate change there is a huge risk of irreparable damage to the biodiversity of our marine environment associated with what is currently being proposed. The public must be informed and consulted with regarding these risks.

5) The State has failed to put in place an expert body that is well equipped and resourced to safeguard our Marine Environment. The National Parks and Wildlife Service for example is so poorly resourced that it has recently been reported as not being in a position to carry out its functions.

"The State agency charged with protecting the natural environment, including habitat and biodiversity in national parks, protected sites and nature reserves, is not fit for the task, according to a Government-commissioned report." Irish Times 3/2/22.

There are a number of expert bodies who have raised concerns regarding the impact of near shore windfarms on biodiversity and given that the Government declared a biodiversity crisis in 2019 surely further assessment of the concerns raised is warranted before we proceed. Advancing projects to tackle climate change, in a shortsighted way without due regard to biodiversity, has the potential to do a lot more harm than good.

6) Given the total failure of the State to protect Derrybrien by allowing windfarm development without adequate safeguards it is very difficult to have confidence in the State to protect our Marine Environment. We must be assured that going forward the State will do a much better job. We must be assured of full compliance with EU directives on Environmental Impact Assessments, The EU Habitats Directive and The Aarhus Convention before the State progresses any Offshore Windfarm Projects. Vested interests can not be allowed to advance their activities without vigorous independent expert monitoring.

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