






SECTION	COMMENT
<p>2.4.1 Phase One</p> <p>‘The MAP sets out detailed requirements regarding public consultation and environmental assessment in the context of the development permission process.’</p>	<ul style="list-style-type: none"> • Please highlight the exact sections of the bill that set out detailed requirements regarding public consultation and environmental assessment. • There is an urgent need to publish clear guidelines on what environmental assessment and monitoring measures are necessary to establish an accurate baseline description of the sites prior to development and what ongoing environmental monitoring measures will be required. • The outlined process appears to take little or no consideration of the suitability of sites for development on environmental and ecological terms, ignores completely the forthcoming MPA designation process and proffers development at any cost based on potentially false assumptions that any environmental or ecological impact can be mitigated by the developer. • Background work needs to be conducted to update current mitigation guidelines to reflect industry best practice for site assessments, surveys and construction of renewable generation sites, including the NPWS <i>Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters</i> which the IWDG is concerned are currently insufficient to mitigate the impacts of noise-generating activities on marine mammals in Irish Waters. • Site assessment and consideration of the suitability of any given site for development should include stated minimum periods of acoustic monitoring to determine both marine mammal species present, their use of the area and ambient noise levels. This assessment must start

	<p>prior to works commencing in order to give a reasonably accurate picture of baseline environment.</p>
MPA Expansion Process	<ul style="list-style-type: none"> It is highly undesirable that Phase 2 and subsequent phases would proceed in the absence of assessment of priorities for designations of an expanded Marine Protected Area network.
ORDEP II	<ul style="list-style-type: none"> It is highly undesirable that Phase 2 would consider a further call for MACs prior to completion of the Offshore Renewable Energy Development Plan (OREDP) II
Site Screening	<ul style="list-style-type: none"> Areas unsuitable for development need to be screened from the Offshore Windfarm Development process at the earliest stage possible.
Windfarm Technology	<ul style="list-style-type: none"> It is important to consider that the final selection of any 'Wind turbine technology' may be site specific and dependent on the environmental and ecological impact assessment of the site
MAC Applications under Phase 2	<ul style="list-style-type: none"> MAC applicants should be expected to provide evidence of implementation of ecological and environmental best practice and innovation to minimise ecological and environmental impacts of marine developments and maximise ecological and environmental benefits resulting from development. MAC applicants should be able to provide strong evidence of implementing ecological and environmental stewardship of previous development sites throughout the lifetime of those developments. Senior Members of the Team should be able to demonstrate at least 10 years of ecological and environmental experience demonstrating implementation of best practice, innovation, and ecological and environmental stewardship. <p>Innovation</p> <ul style="list-style-type: none"> Novel and innovative measures should be encouraged to reduce ecological and environmental impacts and maximise ecological and environmental benefits.

<p>Marine Environmental Enhancement Fund</p>	<ul style="list-style-type: none"> The MECC should actively consider a funding obligation similar to the Scottish Marine Environmental Enhancement Fund (SMEEF) for all MAC consents to contribute to as a condition of consent. This would provide funds to support communities and other groups in marine biodiversity enhancement and innovation projects. See: https://www.nature.scot/funding-and-projects/scottish-marine-environmental-enhancement-fund-smeeef
<p>MACs/Site Consents</p>	<ul style="list-style-type: none"> The proposed duration of MACs/Site Consents is an extraordinary period to allow effective control over activity and access to significant portions of the Irish Sea Area to private companies. These consents must carry with them the highest onus of stewardship on the companies to which MACs and consents are granted and needs to be accompanied by the highest levels of strong and effective environmental and ecological monitoring and regulation to ensure environmental and ecological impacts are minimised and potential environmental and ecological benefits are maximised.


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