Addendum to the Environmental Impact Assessment Report

NISA

North Irish Sea Array

Volume 8: Introductory Appendices

Appendix A6.1 Offshore Environmental Management plan (EMP)

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CIP Copenhagen Infrastructure Partners

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Table of Contents

North Irish Sea Array Windfarm Ltd (NISA, hereafter referred to as 'the Developer') has been considering the Request for Further Information (RFI) issued by An Bord Pleanála (now An Coimisiún Pleanála) as well as the third-party submissions received following public consultation. At An Coimisiún Pleanála's behest, the Developer has also continued to consult with stakeholders in respect of the 2024 planning application throughout 2024-2026. The Developer has refined elements of the design to respond to the third-party submissions, the continued public and stakeholder consultation and the RFI. Amendments are therefore required to Appendix 6.1: Offshore Environmental Management Plan (EMP) of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A1.2 Consultation Report.

For the purposes of clarity, this document shall be read in conjunction with the Appendix 6.1 submitted as part of the 2024 EIAR.

Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Addendum to the EIAR unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR will be clearly labelled as such.

Text in bold is only used throughout this document to indicate where changes are required, and what is subsequently driving them. Text in italics is text from a section of the 2024 EIAR which is deleted, or quotations from other documents (as explicitly stated). Replacement text is in normal font.

Only Tables which have been updated from the 2024 EIAR, or entirely new tables, have been included in the Addendum to the EIAR. These tables can be identified by the "A" prefix in the table caption. Any changes within an updated table, in comparison to tables within the 2024 EIAR, are indicated by grey shading in the relevant cell, column or row, as necessary.

The sections relevant to Appendix A6.1 in the RFI are included below.

RFI Section	RFI	Relevance to Appendix
1 (b)	The scientific information provided as part of the planning application documentation should be based on up-to-date survey reports and data. Accordingly, the applicant is requested to confirm/provide justification/verification that the information submitted in support of the planning application remains relevant and appropriate at the point of submitting further information or to update same as required.	The timeframes associated with the RFI have necessitated a review of the datasets previously used in the 2024 EIAR to ensure any updates to the baseline environment are captured. Therefore, a review of the Offshore Environmental Management Plan has been undertaken to comply with RFI Section 1 (b).
1 (d)	The applicant is requested to provide details of an operational monitoring programme for the proposed development. In this regard, the applicant is advised that the proposed operational monitoring	An Operational Monitoring Plan (OMP) has been developed to address this RFI – see Appendix A6.3: Operational Monitoring Plan. Where appropriate, the relevant technical topics have described

RFI Section	RFI	Relevance to Appendix
	programme should fully inform the requirements of any future decommissioning plan(s) and justify any adaptive mitigation measures required. The proposed operational monitoring should be provided at appropriate intervals, for appropriate periods, and provide for adequate reporting to the relevant compliance authorities.	the proposed approach to operational monitoring. It should be noted that the scope associated with any specific monitoring measures through all phases.
9 (f)	It is noted that development of an Offshore Environmental Plan (OEMP) was not listed as a measure under the operation phase of the project, where it had only been listed under construction and decommissioning (section 12.4.5; table 12.13). The applicant is requested to clarify if an OEMP is considered a mitigation measure under the operation phase.	The Developer can clarify that the Offshore EMP is considered a measures under the operation phase for Benthic Subtidal and Intertidal Ecology, see Section 5.3.
14 (a)	Chapter 18 of the EIAR relates to Offshore Archaeology and Cultural Heritage. Section 18.3.2.5 states that at the time of writing of the EIAR the results of an additional intertidal and shallow water marine geophysical survey at the nearshore of the ECC was unavailable to determine the AEZ of the recorded wreck of the Belle Hill which is a national monument located c. 150m north of the EEC. The applicant is requested to submit the results of the referenced geophysical survey and update the chapter and associated analysis accordingly.	The Developer has provided the results of the referenced geophysical surveys (ADCO, 2024 and 2026) and Chapter 18: Offshore Archaeology and Culutral Heritgae and associated analysis have been updated accordingly. See Section 8.3.1 of this document to view the updated AEZs.
15 (f)	The applicant is requested to examine the need for mitigation measures, in addition to monitoring during the operational phase, to reduce potential impacts on bats, and is requested to provide details in relation to potential mitigation measures, for example, including, inter alia, measures such as curtailment or feathering of blades under certain conditions.	Proposed monitoring for Offshore Bats is considered further in Section 3.11 of Appendix A6.3: Operational Monitoring Plan and Section 5.12 below. The Developer believes there is greater value in focusing on strategic monitoring in collaboration with the ECMG.

1. Introduction

1.1 Introduction

There are no changes to this section. Refer to Section 1.1 of Appendix 6.1 of the 2024 EIAR.

1.2 Purpose of this EMP

There are no changes to this section. Refer to Section 1.2 of Appendix 6.1 of the 2024 EIAR.

1.3 Structure of this EMP

There are no changes to this section. Refer to Section 1.3 of Appendix 6.1 of the 2024 EIAR.

1.4 Associated Documents

The only change to this section is to highlight which stand-alone documents are being referred to. Therefore the list of documents in Section 1.4 of Appendix 6.1 of the 2024 EIAR shall be deleted and replaced with the following:

- Marine Pollution Contingency Procedure (Appendix 1 of this document);
- Emergency Incident Response Procedure (Appendix 2 of this document);
- Marine Mammals Mitigation Protocol (Appendix A14.5);
- Invasive Non-Native Species Management Procedure (Appendix 3 of this document);
- Dropped Objects Procedure (Appendix 4 of this document);
- Waste Management Procedure (Appendix 5 of this document);
- Protocol for Archaeological Discoveries (Appendix 6 of this document);
- Offshore Decommissioning Strategy (Appendix 7 of this document);
- Environmental Vessel Management Plan (Appendix 14.5 of the 2024 EIAR);
- Vessel Management Plan (Appendix A17.2);
- Fisheries Management and Mitigation Strategy (Appendix A16.2);
- Lighting and Marking Procedure (Appendix A17.3);
- Operational Monitoring Plan (OMP) (Appendix A6.3)

Appendix A6.3: OMP specifically outlines the approach for delivering any anticipated monitoring for the offshore development associated with the relevant offshore topics. It should be read in conjunction with this document to determine if monitoring is proposed for each relevant topic.

There are no further changes to this section. Refer to Section 1.4 of Appendix 6.1 of the 2024 EIAR.

1.5 Updating this EMP

There are no changes to this section. Refer to Section 1.5 of Appendix 6.1 of the 2024 EIAR.

1.6 Scope

There are no changes to this section. Refer to Section 1.6 of Appendix 6.1 of the 2024 EIAR.

1.7 Aims and Objectives

There are no changes to this section. Refer to Section 1.7 of Appendix 6.1 of the 2024 EIAR.

2. Proposed Development Details

Following design refinements made in response to the RFI, wind turbine generators (WTGs) are now proposed with jacket foundations installed with suction buckets, and offshore station platforms (OSPs) with jacket foundations installed with either drilled pin piles or suction buckets (refer to Appendix A5.1: Design Refinements). Therefore Figure 2 of Appendix 6.1 of the 2024 EIAR shall be replaced with Figure A1 and Table 1 of Appendix 6.1 of the 2024 EIAR shall be updated with Table A1 below.

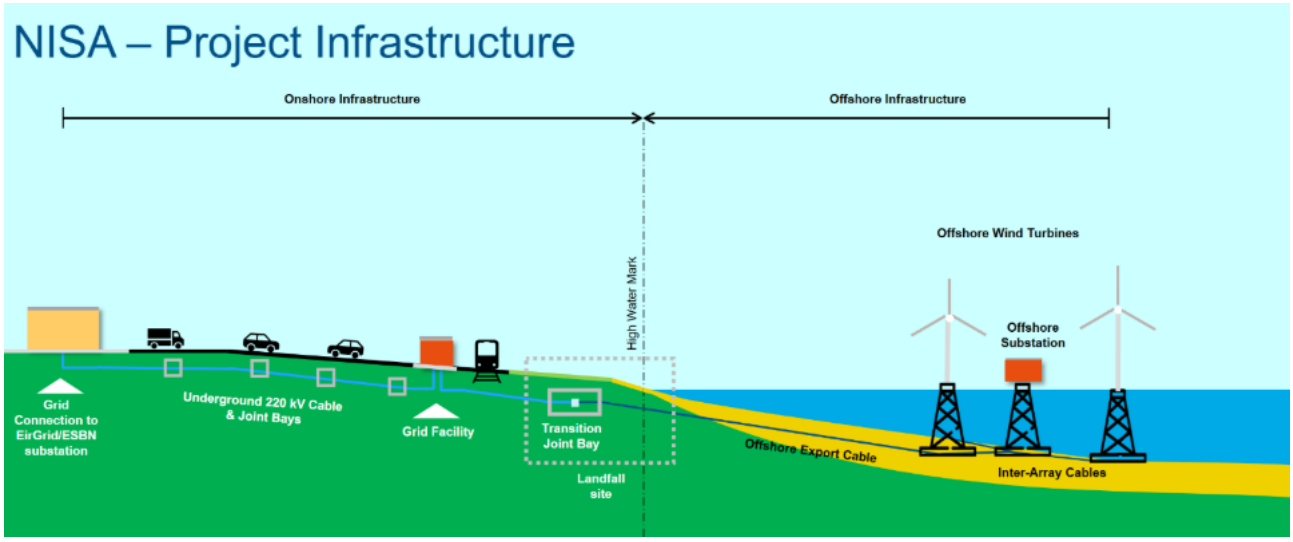

Figure A1 – Indicative Proposed Infrastructure of the proposed development (not to scale) (replacing Figure 2 of Appendix 6.1 of the 2024 EIAR)

Table A1 High Level Overview of the two Project Options for the proposed development (updates Table 1 in Appendix 6.1 of the 2024 EIAR)

Parameter	Project Option 1	Project Option 2
Number of WTGs	49	35
WTG tip height (m above lowest astronomical tide)	290	316 outside aviation restricted zone, 311 inside aviation restriction zone*
Rotor Diameter (m)	250	276
Foundation type	WTG - Jackets with suction bucket installation OSP – Jackets with pin piles or suction bucket installation	WTG - Jackets with suction bucket installation OSP – Jackets with pin piles or suction bucket installation
Number of OSPs	1	1
Offshore export cable length (km)	18	18
Inter-array cable length (km)	111	91

*An aviation restriction zone has been identified by the Developer due to the partial overlap of the array area with a Dublin Airport Instrument Flight Procedure. This is further detailed in Chapter 19: Aviation and Radar.

There are no further changes to this section. Refer to Section 2 of Appendix 6.1 of the 2024 EIAR.

3. Project Organisation and Responsibilities

There are no changes to this section. Refer to Section 3 of Appendix 6.1 of the 2024 EIAR.

3.1 Employer

There are no changes to this section. Refer to Section 3.1 of Appendix 6.1 of the 2024 EIAR.

3.2 Employers Representative

There are no changes to this section. Refer to Section 3.2 of Appendix 6.1 of the 2024 EIAR.

3.3 Project Manager

There are no changes to this section. Refer to Section 3.3 of Appendix 6.1 of the 2024 EIAR.

3.4 Construction Manager

There are no changes to this section. Refer to Section 3.4 of Appendix 6.1 of the 2024 EIAR.

3.4.1 Site-Specific Method Statements

There are no changes to this section. Refer to Section 3.4.1 of Appendix 6.1 of the 2024 EIAR.

3.4.2 General

There are no changes to this section. Refer to Section 3.4.2 of Appendix 6.1 of the 2024 EIAR.

3.5 Design Engineer

There are no changes to this section. Refer to Section 3.5 of Appendix 6.1 of the 2024 EIAR.

3.6 Environmental Manager

There are no changes to this section. Refer to Section 3.6 of Appendix 6.1 of the 2024 EIAR.

3.7 Offshore Environmental Clerk of Works (ECoW)

There are no changes to this section. Refer to Section 3.7 of Appendix 6.1 of the 2024 EIAR.

3.8 Fisheries Liaison Officer (FLO)

There are no changes to this section. Refer to Section 3.8 of Appendix 6.1 of the 2024 EIAR.

3.9 Marine Coordinator (MC)

There are no changes to this section. Refer to Section 3.9 of Appendix 6.1 of the 2024 EIAR.

3.10 Supporting Environmental Specialists

There are no changes to this section. Refer to Section 3.10 of Appendix 6.1 of the 2024 EIAR.

4. General Environmental Requirements

4.1 Introduction

There are no changes to this section. Refer to Section 4.1 of Appendix 6.1 of the 2024 EIAR.

4.2 Method Statements

There are no changes to this section. Refer to Section 4.2 of Appendix 6.1 of the 2024 EIAR.

5. Schedule of Environmental Commitments

There are no changes to this section. Refer to Section 5 of Appendix 6.1 of the 2024 EIAR.

5.1 Marine Geology, Oceanography and Physical Processes

5.1.1 Embedded Mitigation Measures

There are no changes to this section. Refer to Section 5.1.1 of Appendix 6.1 of the 2024 EIAR.

5.1.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.1.2 of Appendix 6.1 of the 2024 EIAR.

5.2 Marine Water and Sediment Quality

5.2.1 Embedded Mitigation Measures

There are no changes to this section. Refer to Section 5.2.1 of Appendix 6.1 of the 2024 EIAR.

5.2.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.2.2 of Appendix 6.1 of the 2024 EIAR.

5.3 Benthic Subtidal and Intertidal Ecology

5.3.1 Embedded Mitigation Measures

The key change required in this section is the addition of the Offshore EMP for the operation phase of the proposed development (as per RFI Section 9 (f)), as well as adding abbreviations. Table 2 of Appendix 6.1 of the 2024 EIAR has been updated by Table A2 below:

Table A2: Embedded mitigation measures in relation to benthic subtidal and intertidal ecology (replaces Table 2 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Cable installation measures/Cable Burial Risk Assessment	Cable installation measures will seek to minimise adverse impacts to potentially sensitive receptors. It will also set out appropriate cable burial depth in accordance with industry good practice, reducing the risk of cable exposure and based on a cable burial risk assessment. Cables will be buried to a sufficient depth to ensure that they are not exposed via erosion or seabed lowering. Where target cable burial depth cannot be achieved during the cable installation process (for any of inter-array, interconnector or export cables), cable armouring will be implemented (e.g. mattressing, or rock placement etc). The suitability of installing rock or mattresses for cable protection will be investigated, based on (inter alia) the seabed current data at the location of interest and a risk assessment of the potential for cable damage to occur. Cable installation measures are captured in the Offshore Environmental Management Plan (EMP)
Cable burial	Cable installation will follow the burial hierarchy, where practicable two attempts will be made to bury cables before cable protection is used.
Landfall	The installation of the offshore export cables at landfall will be undertaken by Horizontal Directional Drilling (HDD) beneath the intertidal zone which will prevent any direct disturbance to intertidal receptors. The HDD exit pits will be located within the Export Cable Corridor (ECC) seaward of the Low Water Mark (LWM) at a point where cable installation vessels can operate.

Measure	Mitigation detail
Project Design	Presence of sensitive habitats will be identified through a review of the latest available benthic datasets and pre-construction surveys. Proposed development infrastructure will avoid protected habitats wherever reasonably practicable to an extent not resulting in a hazard for marine traffic and Search & Rescue capability.
Offshore Environmental Management Plan (EMP) **(this document)**	An Offshore EMP has been developed and will include details of: ▪ Marine pollution contingency measures to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM; ▪ A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance; ▪ Marine biosecurity measures detailing how the risk of introduction and spread of invasive non-native species will be minimised; ▪ Waste management and disposal arrangements; ▪ A VMP, to determine vessel routing to and from construction sites and ports, to include a code of conduct for vessel operators; and ▪ The appointment and responsibilities of a company Fisheries Liaison Officer (FLO).
Pre-construction profile survey	Where necessary, before works commence and following reinstatement, a topographical survey of the nearshore subtidal area will be carried out to identify and map the contours of the subtidal HDD exit pit to ensure a profile similar in nature to the profile recorded during the pre-construction survey is reinstated, as far as practicable.
Operation	
Offshore Environmental Management Plan (EMP)	An Offshore EMP will be developed and will include details of: ▪ Marine pollution contingency measures to address the risks, methods and procedures to deal with any spills and collision incidents of the authorised project in relation to all activities carried out below the HWM; ▪ A chemical risk review to include information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance; ▪ Marine biosecurity measures detailing how the risk of introduction and spread of invasive non-native species will be minimised; ▪ Waste management and disposal arrangements; ▪ Operational monitoring plan; ▪ A vessel management plan, to determine vessel routing to and from construction sites and ports, to include a code of conduct for vessel operators; and ▪ The appointment and responsibilities of a company Fisheries Liaison Officer (FLO).
Electromagnetic Field (EMF) and cable protection	Where practicable cables will be buried to reduce the impacts of EMF on sensitive receptors and minimise the requirement for additional cable protection.
Decommissioning	
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential environmental impacts to benthic ecology receptors from the proposed decommissioning activities will be undertaken, considering the baseline environment at the pre-decommissioning stage. All mitigation measures to be captured will be captured within the Rehabilitation Schedule and decommissioning

Measure	Mitigation detail
	strategy within the Offshore EMP. Any licences or authorisations that might be required will be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

There are no further changes to this section. Refer to Section 5.3.1 of Appendix 6.1 of the 2024 EIAR.

5.3.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.3.2 of Appendix 6.1 of the 2024 EIAR.

5.4 Fish and Shellfish Ecology

5.4.1 Embedded Mitigation Measures

The key change to this section relates to the refined design parameters of the proposed development which include no option for driven monopiles, therefore removing the need for mitigation measures relating to pile driving activities. Moreover, the Developer has committed to the use of a Noise Abatement System (NAS) e.g. bubble curtains or similar if high order UXO clearance is required. Therefore, Table 3 of Appendix 6.1 of the 2024 EIAR has been updated by Table A3 below:

Table A3: Embedded mitigation measures in relation to fish and shellfish ecology (replaces Table 3 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Marine Pollution Contingency Procedure (MPCP)	Marine pollution prevention and contingency measures will be implemented as part of Appendix A6.1: Offshore Environmental Management Plan (EMP; hereafter the Offshore EMP) to manage the risk of accidental pollution from offshore operations relating to the proposed development (Appendix 2A and 2B in Offshore EMP). The MPCP will include the following control measures and procedures: ▪ A chemical risk review with information regarding how and when chemicals (including vessel fuels) are to be used, stored and transported in accordance with recognised best practice guidance and national and international regulations and commitments; ▪ Navigational safety measures (e.g., guard vessels, safety buoys, lighting of active working zones) to reduce the likelihood of collision events; and ▪ Emergency response methods and procedures to deal with any spills and collision incidents. ▪ Implementation of these measures would reduce the likelihood of potentially harmful pollutants to be released into the marine environment, thereby reducing the likelihood of pollution impacts on sensitive fish and shellfish receptors.
Offshore Waste Management Procedure	An Offshore Waste Management Procedure setting out waste management and disposal procedures will be implemented as part of the Offshore EMP (Appendix 6 in Offshore EMP). The Waste Management Procedure will include the following measures:

Measure	Mitigation detail
	▪ Application of the waste hierarchy (prevention, re-use, recycle, recovery, and disposal) to minimise the amount of waste produced, and reduce, as far as possible, the amount of waste that is disposed of in landfill; ▪ Waste disposal procedures, ensuring all waste that cannot be reused, recycled or recovered will be kept onboard vessels and safely disposed of onshore in a suitable licensed waste facility; and ▪ Code of conduct for vessel operators with respect to the discharge of wastewater and handling and storing of hazardous materials. Implementation of these measures will reduce the likelihood of potentially harmful pollutants to be released into the marine environment, thereby reducing the likelihood of pollution impacts on potentially sensitive migratory fish species.
Environmental Vessel Management Plan (EVMP)	An EVMP will be implemented to minimise the risk of collision, injury and disturbance to marine wildlife during construction activities, which will include a code of conduct for vessel operators when encountering marine species (Appendix 14.5 of the 2024 EIAR). In addition, vessel movements to and from construction sites and ports will, where feasible, follow existing routes. While the measures are targeted towards marine mammals and birds at sea, they would equally reduce the risk of injury and disturbance to marine turtles and larger mobile receptors, such as basking sharks.
UXO Management Measures	The clearance of UXO will follow a mitigation hierarchy, with micro-siting of subsea infrastructure around UXO where practicable. Where avoidance is not possible, relocating the UXO to a safe place and leaving in situ will be considered. Where clearance of UXO is required (i.e. avoidance or relocation is not practicable), removal of the UXO from the site or low order clearance at the UXO location will be adopted where feasible. However, removal of the UXO or low order deflagration of the UXO are not always possible and are dependent upon the individual situations surrounding each UXO. Therefore, a high order detonation of the UXO may be required. A case-by-case risk assessment will be undertaken following pre-construction surveys (dedicated geophysical and Remotely Operated Vehicles (ROV) surveys) as part of the construction phase (Appendix A14.5: Marine Mammal Mitigation Protocol (MMMP), and Appendix A6.1: Offshore EMP (this document)). Where there may be clusters of UXO requiring detonation, these UXO will not be detonated at the same time. In addition, to reduce in-combination impacts to harbour porpoise protected within the Rockabill to Dalkey Island SAC, the Developer has committed to not undertake any high order UXO detonations at the proposed development at the same time Codling undertakes high order clearance within its Offshore Export Cable Corridor (Chapter 14: Marine Mammal Ecology).
Noise Abatement System (NAS) during high order UXO clearance	The Developer has committed to the use of NAS e.g. bubble curtain or similar if high order UXO clearance is required (Chapter 13: Fish and Shellfish Ecology). This would reduce the impact of UXO clearance noise on sensitive fish and shellfish species.
Pre-construction profile survey	Where necessary, before works commence and following reinstatement, a topographical survey of the nearshore subtidal area will be carried out to identify and map the contours of the subtidal HDD exit pit to ensure a

Measure	Mitigation detail
	profile similar in nature to the profile recorded during the pre-construction survey is reinstated, as far as practicable.
Operation	
Cable burial and cable protection measures	Export and inter-array cables will be buried where practicable to ensure they are not exposed by sediment movements (Section 8.3.10 in the Offshore Construction Strategy). Where cables cannot be buried, additional cable protection measures such as rock placement or mattressing will be applied to achieve adequate cable protection. Up to 20% of cable length is expected to need protection either during initial installation, or throughout the operational phase of the proposed development (Chapter 8). Cable burial or cable protection increases the distance between the cables and electro- and magneto-sensitive receptors, thereby reducing the received EMF (from attenuation of the EMF).
MPCP, Offshore Waste Management Procedure, EVMP	Marine pollution and waste management control measures and vessel operating procedures will be implemented throughout the operational phase of the proposed development, following the same measures and procedures that were implemented during the construction phase.
Decommissioning	
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential environmental impacts to fish and shellfish receptors from the proposed decommissioning activities will be undertaken, considering the baseline environment at the pre-decommissioning stage. All mitigation measures to be captured will be captured within the Rehabilitation Schedule and decommissioning strategy within the Offshore EMP. Any licences or authorisations that might be required will be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

There are no further changes to this section. Refer to Section 5.4.1 of Appendix 6.1 of the 2024 EIAR.

5.4.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.4.2 of Appendix 6.1 of the 2024 EIAR.

5.5 Marine Mammal Ecology

5.5.1 Embedded Mitigation Measures

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2 (refer to Appendix A5.1 Design Refinements and Appendix A10.1: Marine Processes Review of Project Options). In the 2024 EIAR, WTG monopile foundations and OSP monopile and jacket foundations with pin piles were considered. Following design refinement in response to the RFIs, monopiles have been removed and WTG foundations will now be installed with Suction Bucket Jackets (SBJs), and OSP jacket foundations installed with either drilled pin piles or suction buckets, as well as noise abatement systems (NAS) (e.g. bubble curtain or similar) for high-order UXO clearance. Therefore, Table 4 of Appendix 6.1 of the 2024 EIAR has been updated by Table A4 below:

Table A4 Embedded mitigation measures in relation to marine mammal ecology (replaces Table 4 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Marine Pollution Contingency Procedure (MPCP)	An offshore Environment Management Plan (EMP) is provided in Appendix A6.1 (this document) and will be implemented to cover the construction, operational and decommissioning phase of the proposed development. The Offshore EMP includes a MPCP to cover accidental spills, potential contaminant release and include key emergency contact details. Key measures in the MPCP include: ▪ Compliance with MARPOL; ▪ Spill kits on board all vessels; ▪ Fuel and chemical storage according to relevant storage regulations; ▪ Handling of waste in accordance with relevant waste regulations; and ▪ Vessel refuelling to take place in port. The measures included in the MPCP would reduce the likelihood of potentially harmful pollutants to be released into the marine environment which may then impact on marine mammal receptors. Further information is provided in Appendix A6.1 (this document).
Collision avoidance	The Department of Communications, Marine and Natural Resources released a Marine Notice (No 15 of 2005) for the correct procedures when encountering whales and dolphins in Irish coastal waters (DCMNR 2005). Alongside this Marine Notice, the Irish Whale and Dolphin Group provided a Code of Conduct for all watercraft encountering whales and dolphins (IWDG 2005). These guidelines were drafted specifically for the interactions between small vessels and marine mammals (e.g. whale watching passenger vessels), however the key principles will be followed by all project vessels where practicable to minimise the risk of vessel collisions with marine mammals and disturbance to marine mammals from vessels. These measures are captured within Appendix 14.5 Environmental Vessel Management Plan (EVMP) of the 2024 EIAR. Other key measures to mitigate collision risk, as described in the EVMP include: ▪ When an animal(s) is first sighted, vessels should maintain a steady course (speed and direction) to allow marine mammals to predict the vessel's path; ▪ Where practicable, when an animal(s) is in close proximity (for example 100 – 200 m), vessel speed should be gradually reduced and maintained below 7

Measure	Mitigation detail
	knots (in accordance with DCMNR, 2005). The exception to this is when behaviour such as bow riding is experienced, where speed should be maintained on a steady course; ▪ If animals are moving in a consistent direction, maintain a parallel course; ▪ Do not cut off individuals by moving across their path; ▪ Avoid deliberately approaching marine mammals when sighted; ▪ Avoid abrupt changes to course or speed should marine mammals approach the vessel, be on course to cross the path of a vessel or bow-ride; and ▪ Transit vessels should maintain a minimum distance of 150m or more from the coast, particularly when near to known seal haul-out sites during sensitive periods (i.e. moulting and breeding seasons). Vessels should remain in the vicinity of seals for no more than 15 minutes.
Auditory injury and disturbance from high order UXO clearance	The Developer has committed to at-source noise reduction (e.g. bubble curtain or similar) if high order UXO clearance is required. Additionally, to reduce in-combination impacts on the Rockabill and Dalkey Island SAC, the Developer has committed not to carry out any high-order detonations at the Proposed Development at the same time that Codling undertakes high-order detonations within its OECC.
Operation	
Marine Pollution Contingency Procedure (MPCP)	The Offshore EMP includes a MPCP to cover accidental spills, potential contaminant release and include key emergency contact details. ▪ Key measures in the MPCP include: ▪ Compliance with MARPOL; ▪ Spill kits on board all vessels; ▪ Fuel and chemical storage according to relevant storage regulations; ▪ Handling of waste in accordance with relevant waste regulations; and ▪ Vessel refuelling to take place in port. The MPCP would reduce the likelihood of potentially harmful pollutants to be released into the marine environment which may then impact on marine mammal receptors.
Collision avoidance	The Department of Communications, Marine and Natural Resources released a Marine Notice (No 15 of 2005) for the correct procedures when encountering whales and dolphins in Irish coastal waters (DCMNR 2005). Alongside this Marine Notice, the Irish Whale and Dolphin Group provided a Code of Conduct for all watercraft encountering whales and dolphins (IWDG 2005). These guidelines were drafted specifically for the interactions between small vessels and marine mammals (e.g. whale watching passenger vessels), however the key principals will be followed by all proposed development vessels where practicable to minimise the risk of vessel collisions with marine mammals and disturbance to marine mammals from vessels. These measures are captured within Appendix 14.5 EVMP of the 2024 EIAR. Other key measures from the EVMP are the same as those listed in the construction collision avoidance mitigations section of this table.
Decommissioning	
Collision avoidance	The Department of Communications, Marine and Natural Resources released a Marine Notice (No 15 of 2005) for the correct procedures when encountering whales and dolphins in Irish coastal waters (DCMNR 2005). Alongside this Marine Notice, the Irish Whale and Dolphin Group provided a Code of Conduct for all watercraft encountering whales and dolphins (IWDG 2005). These guidelines were drafted specifically for the interactions between small vessels

Measure	Mitigation detail
	and marine mammals (e.g. whale watching passenger vessels), however the key principals will be followed by all Project vessels where practicable to minimise the risk of vessel collisions with marine mammals and disturbance to marine mammals from vessels. These measures are captured within the EVMP. Other key measures from the EVMP are the same as those listed in the construction collision avoidance mitigations section of this table.
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential environmental impacts to marine mammal receptors from the proposed decommissioning activities would be undertaken, considering the baseline environment at the pre-decommissioning stage. All mitigation measures to be delivered would be captured within the Rehabilitation Schedule and Offshore EMP. Any licences or authorisations that might be required would be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

There are no further changes to this section. Refer to Section 5.5.1 of Appendix 6.1 of the 2024 EIAR.

5.5.2 Mitigation and Monitoring Measures

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2 (refer to Appendix A5.1 Design Refinements and Appendix A10.1: Marine Processes Review of Project Options). In the 2024 EIAR, WTG monopile foundations and OSP monopile and jacket foundations with pin piles were considered. Following design refinement in response to the RFIs, monopiles have been removed and WTG foundations will now be installed with suction buckets, and OSP jacket foundations installed with either drilled pin piles or suction buckets, as well as at-source noise reduction (e.g. bubble curtain or similar) for high-order UXO clearance. Therefore, pile driving impacts and associated mitigation and monitoring are no longer considered and deleted from Table 5 of Appendix 6.1 of the 2024 EIAR and mitigation for high order UXO clearance is added.

To clarify, Table 5 of Appendix 6.1 of the 2024 EIAR has been updated by Table A5 below:

Table A5: Mitigation related to marine mammal ecology (replaces Table 5 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Geophysical survey monitoring	Geophysical survey equipment sources with a greater than negligible magnitude of impact will be covered by 'Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters' (DAHG 2014), which outlines measures to reduce the potential impacts (PTS and disturbance) to negligible levels. Only the SBP is predicted to overlap with the estimated hearing range of relevant marine mammal species. Measures proposed are: ▪ A mitigation zone (an area within which mitigation must be applied to prevent instantaneous injury) of 500m radial distance from the SBP source; and ▪ A qualified and experienced marine mammal observer (MMO) will be appointed to monitor for marine mammals and to log all relevant events using

Measure	Mitigation detail
	standardised data forms in accordance with licensing and regulatory requirements; and ▪ Survey equipment with a source SPL above 170 dB re 1µPa shall commence from a lower energy start-up and increase gradually over a period of 40 minutes. ▪ The start of the acoustic equipment will be delayed if marine mammals are detected within the mitigation zone during the pre-watch, allowing the animals time to move away from the acoustic source. The start of the source will be delayed for at least 30 minutes following the last sighting within the mitigation zone; and ▪ For any breaks in operation of the equipment of 10 minutes the MMO/PAM operator will undertake dedicated monitoring to check no marine mammals are present within the mitigation zone prior to the source restarting; and ▪ For line changes taking longer than 40 minutes, the source will be stopped, then a pre-watch of 30 minutes followed by a soft-start will be required to resume operations. Further details on these measures are included in the MMMP (Appendix A14.5).
UXO clearance mitigation measures, including: • MMO; • Acoustic Deterrent Device (ADD) (if required); and • At-source noise reduction (E.g. bubble curtain or similar).	The implementation of a Marine Mammal Mitigation Protocol (MMMP) (Appendix A14.5) with specific measures should UXO clearance be required, to ensure the risk of PTS to marine mammals is imperceptible (not significant levels). The list of measures and procedures can be modified in accordance with advice received from the regulator and their specialist UXO advisors as appropriate prior to UXO clearance activities commencing. Measures will include: ▪ If detonation is deemed necessary, a mitigation zone of 1,000m from the detonation location will be established, within which it will be ensured, through visual observations (trained and experienced MMOs)that no marine mammals are present prior to the detonation event. ▪ Where a UXO disposal method has a risk of PTS impact range that may exceed the 1,000m mitigation zone there is a residual risk of auditory injury to marine mammals at a greater range than can be mitigated by monitoring of the 1,000m mitigation zone alone. Therefore, an ADD will be operated for a pre-determined length of time, concurrent to the pre-detonation search, to deter marine mammals to a greater distance prior to any detonation.
Operation	
Nil	No mitigation measures are anticipated to be required specifically during the operational phase.
Decommissioning	
Nil	No additional mitigation measures are anticipated to be required specifically during the decommissioning phase. All relevant embedded mitigation measures will still apply.

There are no further changes to this section. Refer to Section 5.5.2 of Appendix 6.1 of the 2024 EIAR.

5.6 Offshore and Intertidal Ornithology

5.6.1 Embedded Mitigation Measures

The change required in this section is in response to the refinement and reduction of the offshore development area, in addition to a refinement and reduction in the WTG layouts.

To clarify, Table 6 of Appendix 6.1 of the 2024 EIAR has been updated by Table A6 below:

Table A6 Embedded mitigation measures relating to offshore and intertidal ornithological receptors (replaces Table 6 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Refinement and reduction in the offshore development area	Refinements in the offshore development area from the extent of the original MAC boundary (as outlined in the Alternatives Chapter) were undertaken to avoid key areas for birds (e.g., avoidance of density hotspots that may indicate key foraging areas where possible, alongside avoidance of breeding colonies and migration corridors where possible). Reducing the extent of the offshore development area also increases distance from Rockabill Island and Lambay Island which leads to a considerable reduction in interaction with bird species that inhabit these SPA colonies. There has been a considerable reduction in the size of the array area from the original MAC boundary. This process considered hotpots of auks, the most abundant species within the survey area, using species heatmaps from raw observations and a modelled approach using MRSea (MRSea Modelling Report). The results of this modelling clearly show high densities of guillemots and razorbills in proximity to Lambay Island during the breeding season. During this time the densities of birds within the array area are comparatively low. Outside of the breeding season there are no clear hotspots throughout the survey area (MAC boundary plus 4km buffer). This process was undertaken for the proposed development, with the array area of the proposed development being reduced by more than 60% from the MAC boundary of 195.9km^2 to the refined array area of 88.5km^2.
Reduction in WTG Footprint	The design process has refined and reduced the footprint of the fixed WTG layouts for Project Option 1 and Project Option 2 to reduce the spatial extent of the offshore infrastructure within the NWIS cSPA. The footprint of the WTGs with 500m Limit of Deviation (LOD) within the array area has reduced the area of overlap (in terms of area of potential displacement for Common Guillemot, which includes a 2km buffer around the array area) from 8.5% to 6.9% of the NWIS cSPA.
Increase in air draft	The design has increased the WTG air draft, which reduces the collision risk to key vulnerable ornithological receptors by reducing the rotor swept area that is at collision risk height. All turbines in Project Option 1 will have minimum air draft of 40m LAT. Turbines in Project Option 2 will have a minimum air draft of 40m LAT except where they are in the aviation restriction zone where the air draft will be 35m LAT. The number of birds at collision risk height at 40m is considerably reduced compared to 22m. For example, the number of common tern flying at collision risk height is reduced by 90.6% between 22m and 40m. Likewise, kittiwake have a reduction of birds at collision risk height of 82.2% between 22m and 40m, and gulls show a reduction of roughly 65%.

Lighting design	Lighting design will avoid lighting levels that exceed those required to comply with navigational safety, aviation, emergency procedures and general activity to reduce the risk of WTG and OSP lighting attracting birds during periods of bad weather or at night. This measure will be provided as part of the Lighting Management Plan (LMP).
Standard pollution and waste management	Each WTG will be equipped with sensors to enable early detection of fluids and leaks. Spill kits will also be located on each WTG to contain any fluids in the unlikely event of pollutant release. Pollution and waste management is considered within Appendix A6.1: Offshore EMP.
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential environmental impacts to fish and shellfish receptors from the proposed decommissioning activities would be undertaken, considering the baseline environment at the pre-decommissioning stage. All mitigation measures to be captured would be captured within the Rehabilitation Schedule. Any licences or authorisations that might be required would be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

5.6.2 Mitigation and Monitoring Measures

Mitigation

There are no changes to this section. Refer to Section 5.6.2 of Appendix 6.1 of the 2024 EIAR.

Monitoring

Following updates to Appendix A6.3: Operational Monitoring Plan the following section of Appendix 6.1 of the 2024 EIAR shall be deleted in its entirety and replaced with the following:

As highlighted within Appendix A6.3: OMP, the Developer believes there is greater value in focusing on strategic monitoring in collaboration with the East Coast Monitoring Group (ECMG). A more coordinated, strategic study is likely to provide stronger and more meaningful results, enabling the identification of potential changes at a much broader scale.

Nevertheless, a number of possible project specific monitoring options are outlined in Table 3.1 of Appendix A6.3: OMP, these have not yet been fully developed and will require further consultation with the relevant statutory body, such as NPWS, post consent. It is anticipated that these studies would primarily focus on key species including Guillemot, Razorbill, Kittiwake, Red-throated Diver, and terns.

There are no further changes to this section. Refer to Section 5.6.2 of Appendix 6.1 of the 2024 EIAR.

5.7 Commercial Fisheries

5.7.1 Embedded Mitigation Measures

Following further design refinement in response to RFI Section 10 (a), the key changes required in this section is the revision of the foundation installation method for Project Option 1 and Project Option 2 (WTGs are now proposed with SBJ foundations, and OSPs with jacket foundations installed with either drilled pin piles or suction buckets).

Therefore, Table 7 of Appendix 6.1 of the 2024 EIAR has been updated with Table A7 below:

Table A7: Embedded mitigation measures in relation to commercial fisheries (replaces Table 8 in Appendix 6.1 of the 2024 EIAR)

Embedded mitigation	Justification
Construction	
Fisheries liaison	The Developer is committed to ongoing liaison with fishers throughout all stages of the project, including: ▪ Continuation of the appointment of a company FLO to continue to maintain effective communications between the project and fishers, in compliance with the Seafood/ORE Engagement in Ireland guidance (Seafood/ORE Working Group, 2023); ▪ Appropriate liaison with relevant fishing interests to ensure that they are fully informed of development planning and any offshore activities and works; ▪ Timely issue of notifications including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings to the fishing community to provide advance warning of project activities and associated advisory safe passing distances; and ▪ Development of an FMMS (Appendix A16.2) setting out in detail the approach to fisheries liaison and means of delivering co-existence and disruption payments.
Agreement of lighting and marking with Commissioners of Irish Lights during construction.	Implementation of a buoyed construction area around the site (assumed to be 12 construction buoys) during the appropriate phases, in consultation with Commissioners of Irish Lights.
Dropped objects	The approach for dealing with dropped objects, including reporting and recovery of dropped objects where they pose a potential hazard to other marine users, is included in the offshore environmental management plan (EMP). Measures to prevent dropped objects include: ▪ Good housekeeping practices, with all wastes correctly stored; ▪ Storage of hazardous chemicals as per material safety data sheet (MSDS); ▪ Lift planning for over-the-side lifting (including appropriate crane rigging and load ratings, crane operator and rigger training and competency requirements) all lifting equipment will be tested and certified; ▪ A ship-to-ship transfer permit will be in place; ▪ All deck items will be securely stowed;

Embedded mitigation	Justification
	▪ Transfers of objects will use specialist equipment and consider environmental conditions; ▪ Ongoing personnel awareness and training, and dropped object prevention programs (e.g., lanyards on hardhats, hand tools); ▪ Safe working procedures to prevent dropped objects; ▪ Procedures will be put in place to ensure that the location of any lost material is recorded and that significant objects are recovered - including ROV and boat recovery where practicable; ▪ Ongoing personnel awareness and training, and dropped object prevention programs; and ▪ Waste Management Plan.
Cable burial	Preferred means of cable protection is cable burial with typical trench depth of between 1-3 m and typical trench width of 1 m.
Cable Burial Risk Assessment (CBRA)	CBRA undertaken pre-construction following detailed site investigation surveys including consideration of under keel clearance and appropriate cable protection applied based upon the outcomes. To include consideration of requirements for monitoring of the protection.
Guard vessels	Use of temporary guard vessel during construction phase will be employed if deemed necessary during detailed design stage and following consultation with the relevant statutory authorities, e.g. to protect unlit structures and/or unprotected cable prior to burial.
Advisory safety zones	During construction the proposed development will deploy advisory safety zones around individual structures undergoing installation. Irish navigational guidance is available through the Department of Transport's Maritime Navigation Safety Guidance and Emergency Response document for Offshore Renewable Energy Installations (2025), which has taken account of relevant UK guidance, in particular Maritime and Coastguard Agency MGN 654 (Maritime and Coastguard Agency, 2021) in the establishment of advisory safety zones. Advisory safety zones of up to 500m in radius around individual structures undergoing installation will be established. Advisory safety zones of 50m will be sought for incomplete structures where construction activity may be temporarily paused (and therefore the 500m safety zone has lapsed) such as installed foundations or where construction works are completed but the WTGs have not yet been commissioned.
Advisory safe passing distances	Use of advisory safe passing distances including surrounding vessels that are undertaking sensitive construction, installation, or maintenance works. These vessels are likely to display Restricted in Ability to Manoeuvre (RAM) status.
Operation	
Fisheries liaison	The Developer is committed to ongoing liaison with fishers throughout all stages of the project, including:

Embedded mitigation	Justification
	▪ Continuation of the appointment of a company FLO to continue to maintain effective communications between the project and fishers, in compliance with the Seafood/ORE Engagement in Ireland guidance (Seafood/ORE Working Group, 2023); ▪ Appropriate liaison with relevant fishing interests to ensure that they are fully informed of development planning and any offshore activities and works; ▪ Timely issue of notifications including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings to the fishing community to provide advance warning of project activities and associated advisory safe passing distances; and ▪ Development of a FMMS (Appendix A16.2) setting out in detail the approach to fisheries liaison and means of delivering co-existence and disruption payments.
Snagging	In the instance that snagging does occur, the Developer will work to the protocols laid out within the guidance produced by the UK FLOWW group and 'Recommendations for Fisheries Liaison: Best Practice' guidance for offshore renewable developers, in particular Section 11: Dealing with claims for loss or damage of gear as confirmed in the FMMS (Appendix A16.2).
Agreement of lighting and marking with Commissioners of Irish Lights during the operation and maintenance phase.	The Developer is committed to marking and lighting the project in accordance with relevant industry guidance and as advised by relevant stakeholders including in accordance with IALA Recommendation O-139 (IALA, 2013) and Irish Lights requirements. In particular, the use of marine lighting to mark selected peripheral structures. The Developer will also ensure all structures associated with the proposed development are adequately marked on nautical and electronic charts.
Advisory safety zones	During the operational phase, the proposed development will deploy advisory safety zones around any WTG or OSP to protect technicians, crew and vessels on-site during any maintenance works. Safety zones are not a statutory requirement in Ireland meaning they are advisory only, however following UK guidance MGN 654 (Maritime and Coastguard Agency, 2021) the safety zones will be 50m during the operational phase.
Advisory safe passing distances	The proposed development will recommend that advisory clearance distances of up to 500m in radius are observed around cable installation vessels and cable repair vessels during the operational phase.
Decommissioning	
Fisheries liaison	The Developer is committed to ongoing liaison with fishers throughout all stages of the project, including: ▪ Continuation of the appointment of a company FLO to continue to maintain effective communications between the project and fishers, in compliance with the Seafood/ORE Engagement in Ireland guidance (Seafood/ORE Working Group, 2023);

Embedded mitigation	Justification
	▪ Appropriate liaison with relevant fishing interests to ensure that they are fully informed of development planning and any offshore activities and works; ▪ Timely issue of notifications including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings to the fishing community to provide advance warning of project activities and associated advisory safe passing distances; and ▪ Development of a FMMS (Appendix A16.2) setting out in detail the approach to fisheries liaison and means of delivering co-existence and disruption payments.
Agreement of lighting and marking with Commissioners of Irish Lights during decommissioning.	Implementation of a buoyed decommissioning area around the site (assumed to be 12 decommissioning buoys during the appropriate phases, in consultation with Commissioners of Irish Lights.
Advisory safety zones	During decommissioning the proposed development will deploy advisory safety zones around individual structures undergoing installation. Due to a lack of Irish guidance, it is proposed to establish zones based on the relevant UK guidance, UK guidance MGN 654 (Maritime and Coastguard Agency, 2021). Advisory safety zones of up to 500m in radius around individual structures undergoing installation will be established.
Advisory safe passing distances	Use of advisory safe passing distances including surrounding vessels that are undertaking sensitive decommissioning works. These vessels are likely to display Restricted in Ability to Manoeuvre (RAM) status.
Decommissioning strategy	A decommissioning strategy will be developed to cover the decommissioning phase and included as part of the Offshore EMP and Rehabilitation Schedule. The decommissioning strategy is anticipated to cover the removal of all structures above the seabed; cutting of piled foundations at approximately 1m to 2m below the seabed, with remaining sections fully buried; decision to leave or remove scour protection and buried assets; and secure burial of export cables in the intertidal area.

There are no further changes to this section. Refer to Section 5.7.1 of Appendix 6.1 of the 2024 EIAR.

5.7.2 Mitigation and Monitoring Measures

In response to RFI Section 12, the key change to this section is the progress in developing and implementing the Sustainable Fisheries Community (SFC). Therefore, Table 8 of Appendix 6.1 of the 2024 EIAR has been updated with Table A8 below:

Table A8 Mitigation measures relating to commercial fisheries (replaces Table 9 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation description
Construction	
Appendix A16.2: Fisheries Management and Mitigation Strategy (FMMS)	This chapter has concluded significant impacts requiring additional mitigation for Irish demersal otter trawlers targeting Nephrops (*Nephrops norvegicus*) within the array area during the construction phase of the proposed development. Under the NMPF, where significant impacts are identified, a FMMS should be prepared (Fisheries Policy 2). This is provided in Appendix A16.2. The mitigation measures provided within the FMMS have been developed in consultation with the industry as detailed in Appendix C of the FMMS and will continue to be delivered through the FMMS, as it remains a live document. The FMMS includes the following key principles and measures relevant to construction: ▪ **The proposed development will provide a Fisheries Liaison Strategy** The implementation of appropriate communication and information transfer strategies is of key importance to assist in minimising interference and facilitating effective co-existence with the fishing industry. The principles of liaison are that: ▪ The Developer will undertake regular and routine communications via NtM to provide reasonable time (accounting for adverse weather etc.) to enable operational fishing business decisions to be made; ▪ Continued engagement, constructive two-way communication and proactive dialogue between the fishers, their representatives and other fisheries stakeholders and the Developer is desired and is advantageous to all parties; and ▪ All maritime operations that may have an effect on the commercial fishing sector will be made on a factual and accurate basis, in order to prevent unnecessary escalation of issues. ▪ **The proposed development will follow the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023)** The FMMS provides a schedule for liaison and information dissemination. Notice and information will aim to be provided not less than 14 days prior for individual construction vessels mobilisations (where feasible) and weekly construction status updates will be provided.

Measure	Mitigation description
	▪ **The Developer will minimise the size and duration of advisory safety zones during surveys and other works where safe and practicable to do so.** ▪ **The Developer will provide local fisheries stakeholders with procedures for registering disruption payment claims for loss of/damage to fishing gear in association with surveys and construction activities of the proposed development.** ▪ **Vessels undertaking operations in relation to the proposed development will be working to appropriate safety management systems to ensure safe work practices.** ▪ **Vessels undertaking operations in relation to the proposed development will only undertake activities prescribed in their line of work.** ▪ **Vessels involved in the construction, operation and maintenance and decommissioning of the proposed development, including guard vessels and survey vessels, will be provided with the relevant lines of communication (as outlined within the FMMS) to minimise interaction with fishing vessels undertaking their normal activities.** ▪ **The proposed development will provide a Co-existence Strategy within Appendix A16.2: Fisheries Management and Mitigation Strategy, which sets out the approach to maintaining and facilitating fishing activity within and around the array area. This includes the provision of designated trawling corridors aligned with the conventional trawling direction, consideration of over-trawlability and cable burial/protection standards to reduce snagging risk, and the development of operational protocols that recognise local tidal constraints and fishing practices. The strategy also includes a commitment to the monitoring of fishing access and catch rates, including through the proposed Digital Effort Traceability Project.** The Developer regards coexistence as the continuation of both the proposed development and fishing industry activities at the same time within and around the array area and along the ECC. Specifically, these commitments relate to: ▪ Proposed development design, i.e. the location and coordination of all wind farm layout infrastructure and cable burial and protection; ▪ The offshore development area represents only 36% of the full MAC boundary area and was reduced as a commitment by the Developer to ensure optimal seabed usage where possible, whilst ensuring the key other marine users are impacted as minimally as possible. This has been further reinforced through the refined Project Option 1 and Project Option 2 WTG layouts, which demonstrate an additional reduction in the spatial extent of offshore infrastructure within the array area, as set out in Appendix A5.1: Design Refinements; ▪ Design of the array area that maximised corridors between turbines for navigation and orientated the turbines in a NNW - SSE direction to facilitate the direction of trawling in this area; ▪ Appropriate notification of survey and construction activities to other marine users and the retention of a Fisheries Liaison Officer (FLO);

Measure	Mitigation description
	▪ Appropriate lighting and marking of the proposed development and construction vessels; ▪ Appropriate charting of the proposed development and notification of any hazards; and ▪ The adoption of advisory safety zones and a process for marine coordination of all vessel activity. ▪ Code of good practice for all vessels sets out measures for safe navigation, communication, vessel scheduling and reporting of any disruption. ▪ Procedures in relation to gear fastening or loss; set out protocols for securing gear, reporting losses, retrieving lost gear and communicating any entanglement hazards. In addition to the commitments above, vessels undertaking operations in relation to the proposed development will be required to follow the mitigation and management measures provided in other documents and management plans committed to by the proposed development. These are referenced within the FMMS and include**:** ▪ The Lighting and Marking Plan (Appendix A17.3); sets out the types, placement and intensity of lights, identification systems and protocols to ensure visibility and safety. ▪ The Vessel Management Plan (VMP) (Appendix A17.2) sets out navigational safety measures for the proposed development, including use of advisory safety zones and guard vessels (as appropriate) ▪ The Offshore Environmental Management Plan (EMP) (this document, Appendix A6.1); includes a Dropped object procedure which sets out measures for risk assessment, reporting and retrieval protocols for dropped objects.
Sustainable Fisheries Community (SFC) (Appendix B within the FMMS Appendix A16.2)	▪ **The proposed development has established and is delivering a Sustainable Fisheries Community (SFC)) as a mechanism for long-term, collaborative fisheries impact mitigation.** The SFC is a mechanism to deliver long-term proactive fisheries impact mitigation through collaboration and mutual cooperation between the local fishing community and the Developer. The SFC has been established as a formal, fisheries-led structure to support long-term coexistence between the proposed development and commercial fishing activity. It has been developed to provide a structured framework for consultation, mitigation, monitoring, adaptive management and, where relevant, compensation and community benefit initiatives. The SFC will be adapted post consent to implement the the FMMS and is intended to remain active throughout the pre-construction, construction phases and into the operational phases of the proposed development, thereby ensuring that fisheries engagement and mitigation continue over the lifetime of the project rather than being limited to the pre-consent stage. The key aim is to establish a SFC focused on the protection and enhancement of a locally sustainable fisheries and marine environment in the waters around the proposed development.

Measure	Mitigation description
	The SFC is intended to provide a transparent and durable mechanism through which fisheries stakeholders can contribute to project decision-making, the co-design of mitigation measures, and the review of monitoring outcomes. The arrangements developed to date include committee formation, Terms of Reference, Secretariat support and an independently administered fisheries funding mechanism. This ambition includes the following delivered throughout the lifetime of the proposed development: ▪ Collaboration between the Developer and local fishing community. ▪ Provide a definition of what is considered the local fishing community. ▪ Deliver a proactive fisheries impact mitigation process. ▪ Create a mechanism to deliver benefits, both to and from, the local fishing ports. ▪ Work collaboratively to deliver enhancements to the local marine environment. ▪ To, in a broad context, enhance the sustainability of the local fishing community. ▪ Establish ways of collaboratively adding value to local seafood produce. ▪ Support fisheries-led input into mitigation design, monitoring and adaptive management through a formal committee structure with seafood-sector representation. ▪ Support strategic initiatives that improve the evidence base for fisheries coexistence, including spatial activity monitoring, traceability, low impact fisheries initiatives, coastal engagement and marine stewardship projects. The SFC will focus on the commercial fishing industry in the long term through such measures such as enhancing stocks, improvements to fishing vessels, improvements that enhance the profit margins of sustainable fishing activities, and the development of new fisheries or other activities. In support of this role, an independently administered Fisheries Coexistence Fund has been established to enable fisheries-related initiatives and to support broader resilience, diversification and sustainability objectives within affected coastal communities. Funding Round 1 has already supported projects including the Digital Effort Traceability Project (DETP), a coastal education initiative, a low impact fishery pilot and a marine biodiversity mapping initiative, with additional pipeline projects approved in principle. Where construction related impacts occur, and where there are claims to be considered, the Developer will require a significant level of supporting evidence for any such claims. It is for this reason that the Developer has gathered extensive fishing activity information, so as to ensure that this lengthy process can be expedited, for known fishers in the area. This evidence base is being strengthened through targeted consultation and fisheries-led data initiatives, including the DETP, which is intended to improve understanding of fishing activity, spatial footprint, displacement risk and sector dependency within and around the proposed development area.

Measure	Mitigation description
	The Developer will develop a fair, transparent and evidence based disturbance payment scheme for those fishers that can evidence disruption. The SFC is intended to support transparency in this process by improving the quality of fisheries engagement, strengthening the available evidence base and providing a structured forum through which mitigation, monitoring and any necessary adaptive measures can be discussed with the fishing community. Further information of the SFC is provided in the FMMS (Appendix A16.2). Further details on the development of the SFC, its framework arrangements, associated consultation and funded initiatives are provided in Appendix B and Appendix C of Appendix A16.2.
Operation	
Appendic A16.2: FMMS	This chapter has concluded significant impacts requiring additional mitigation for Irish demersal otter trawlers targeting Nephrops (*Nephrops norvegicus*) within the array area during operation. Under the NMPF, where significant impacts are identified, a FMMS should be prepared (Fisheries Policy 2). This is provided as Appendix A16.2. The mitigation measures provided within the FMMS have been developed in consultation with the industry and will continue to be delivered through the FMMS as it remains a live document. The key principles and mitigation details are presented earlier in this table and the measures that are relevant to operation are: • **The Developer will provide a Fisheries Liaison Strategy** • **The Developer will follow the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023)** • **The proposed development will minimise the size and duration of advisory safety zones during operation and maintenance and other activities where safe and practicable to do so.** • **Vessels undertaking operations in relation to the proposed development will be working to appropriate safety management systems to ensure safe work practices.** • **Vessels undertaking operations in relation to the proposed development will only undertake activities prescribed in their line of work.** • **Vessels involved in the operation and maintenance of the proposed development, including guard vessels and survey vessels, will be provided with the relevant lines of communication (as outlined within the FMMS) to minimise interaction with fishing vessels undertaking their normal activities.** • **The proposed development will provide a Co-existence Strategy. with an update provided in Appendix A16.2.** • **In addition to the commitments above, vessels undertaking operations in relation to the proposed development will be**

Measure	Mitigation description
	required to follow the mitigation and management measures provided in other documents and management plans committed to by the proposed development. These are referenced within the FMMS and include the VMP (Appendix A17.2, LMP (Appendix A17.3) and Offshore EMP (this document).
Appendix B: SFC of Appendix A16.2: FMMS	• **The proposed development has established and is delivering a Sustainable Fisheries Community (SFC) as a mechanism for long-term, collaborative fisheries impact mitigation.** The SFC is a mechanism to deliver long-term proactive fisheries impact mitigation through collaboration and mutual cooperation between the local fishing community and the Developer. The SFC has now progressed beyond a proposed concept and has been established as a formal, fisheries-led structure to support long-term coexistence between the proposed development and commercial fishing activity. It has been developed to provide a structured framework for consultation, mitigation, monitoring, adaptive management and fisheries initiatives. The SFC has been developed in parallel with the FMMS and is intended to remain active throughout the pre-construction, construction and operational phases of the proposed development, thereby ensuring that fisheries engagement and mitigation continue over the lifetime of the project rather than being limited to the pre-consent stage. The key aim is to establish a SFC focused on the protection and enhancement of a locally sustainable fisheries and marine environment in the waters around the proposed development. The SFC is intended to provide a transparent and durable mechanism through which fisheries stakeholders can contribute to project decision-making, the co-design of mitigation measures, and the review of monitoring outcomes. The framework arrangements developed to date include committee formation, Terms of Reference, Secretariat support and an independently administered fisheries funding mechanism. This ambition includes the following delivered throughout the lifetime of the proposed development, including the operational phase: ▪ Collaboration between the Developer and local fishing community. ▪ Provide a definition of what is considered the local fishing community. ▪ Create a mechanism to deliver benefits, both to and from, the local fishing ports. ▪ Work collaboratively to deliver enhancements to the local marine environment. ▪ To, in a broad context, enhance the sustainability of the local fishing community. ▪ Establish ways of collaboratively adding value to local seafood produce. ▪ Support fisheries-led input into mitigation design, monitoring and adaptive management through a formal committee structure with seafood-sector representation. ▪ Support strategic initiatives that improve the evidence base for fisheries coexistence, including spatial activity monitoring, traceability, low impact

Measure	Mitigation description
	fisheries initiatives, coastal engagement and marine stewardship projects. The engagement with the local fisheries around the SFC has commenced and initiatives are being delivered, as described in Appendix B of Appendix A16.2. The SFC is now being taken forward as an active and ongoing mechanism for collaboration with the local fishing community, with further workstreams and longer-term initiatives to be developed and refined over time. Delivery of these broad-ranging benefits to the local fishing community, as relevant to the proposed development, will continue through construction and into the operational phase. Prior to the commencement of the operational phase, the SFC will be reviewed and, where necessary, updated to ensure that its arrangements, representation, workstreams and delivery mechanisms remain appropriate to the transition from construction into long-term operation and maintenance. This review will take account of the final form of the authorised project, relevant monitoring outputs, consultation feedback, experience from construction, and the practical requirements of operational coexistence. During the operational phase, the SFC will continue to function as a key fisheries mechanism through which the Developer and fisheries stakeholders can review coexistence outcomes, monitoring evidence and any reported interactions over time, and identify any proportionate updates to mitigation or management measures where required. In this way, the SFC will support an evidence-led and adaptive approach to operational coexistence, rather than a fixed or one-off mitigation response. In support of this objective, an independently administered Fisheries Coexistence Fund has been established to enable fisheries-related initiatives and to support broader resilience, diversification and sustainability objectives within affected coastal communities. Funding Round 1 has already supported projects including the Digital Effort Traceability Project (DETP), a coastal education initiative, a low impact fishery pilot and a marine biodiversity mapping initiative, with additional pipeline projects approved in principle. The operational-phase role of the SFC is therefore expected to include continued support for fisheries liaison, review of monitoring and coexistence evidence, consideration of fisheries-led initiatives, and ongoing collaboration on practical measures that help maintain coexistence between the proposed development and commercial fishing activity over the life of the project. Further details on the development of the SFC, its framework, associated consultation and funded initiatives are provided in Appendix B and Appendix C of Appendix A16.2.
Decommissioning	
Appendix A16:2: FMMS	This chapter has concluded significant impacts requiring additional mitigation for Irish demersal otter trawlers targeting Nephrops (*Nephrops norvegicus*) within the array area during decommissioning. Under the

Measure	Mitigation description
	NMPF, where significant impacts are identified, a FMMS should be prepared (Fisheries Policy 2). This is provided as Appendix A16.2. The mitigation measures provided within the FMMS have been developed in consultation with the industry and will continue to be delivered through the FMMS as it remains a live document. The key principles and mitigation details are presented earlier in this table and the measures that are relevant to decommissioning are: ▪ **The proposed development will provide a Fisheries Liaison Strategy** ▪ **The proposed development will follow the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023)** ▪ **The proposed development will minimise the size and duration of advisory safety zones during surveys and other works where safe and practicable to do so.** ▪ **Vessels undertaking operations in relation to the proposed development will be working to appropriate safety management systems to ensure safe work practices.** ▪ **Vessels undertaking operations in relation to the proposed development will only undertake activities prescribed in their line of work.** ▪ **Vessels involved in the construction, operation and maintenance and decommissioning of the proposed development, including guard vessels and survey vessels, will be provided with the relevant lines of communication (as outlined within the FMMS) to minimise interaction with fishing vessels undertaking their normal activities.** ▪ **The proposed development will provide a Co-existence Strategy, with an update provided in Appendix A16.2: Fisheries Management and Mitigation Strategy.** ▪ **In addition to the commitments above, vessels undertaking operations in relation to the proposed development will be required to follow the mitigation and management measures provided in other documents and management plans committed to by the proposed development. These are referenced within the FMMS and include the VMP, LMP and Offshore EMP.** The FMMS is a live document and will be updated to reflect current (at the time of decommissioning) fishing practices and liaisons to reflect best practice at that point in time.
SFC	▪ **The proposed development has established and is delivering a Sustainable Fisheries Community (SFC)** The SFC is a mechanism to deliver long-term proactive fisheries impact mitigation through collaboration and mutual cooperation between the local fishing community and the Developer. It is a live document and will be updated to reflect the current fishing ahead of decommissioning commencing, to provide a mechanism for dealing with this transitional phase for the fisheries.

Measure	Mitigation description
	The SFC is focused on the protection and enhancement of a locally sustainable fisheries and marine environment in the waters around the proposed development. Further details on the development of the SFC, its framework arrangements, associated consultation and funded initiatives are provided in Appendix B and Appendix C of Appendix A16.2.

There are no further changes to this section. Refer to Section 5.7.2 of Appendix 6.1 of the 2024 EIAR.

5.8 Shipping and Navigation

5.8.1 Embedded Mitigation Measures

The key changes to this section relate to the publication of the DoT guidance and the increase in the Structure Exclusion Zone due to the amendment of the Rockabill Gap. The relevant embedded mitigation measures in Table 10 of Appendix 6.1 of the 2024 EIAR should be disregarded and updated by the those outlined in Table A9 below:

Table A9 Embedded mitigation measures in relation to shipping and navigation (replaces Table 10 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Advisory safe passing distances	Advisory safe passing distances may be deployed around ongoing work being undertaken by a construction or maintenance vessel with notice of these promulgated through Notices to Mariners and Marine Notices (where deemed appropriate).
Buoyed construction area	A buoyed construction area around the array will be implemented during the appropriate phases in agreement with Irish Lights and as outlined in Appendix A17.3: Lighting and Marking Plan (LMP).
Cable protection	Cable protection (burial or external protection) will be implemented and monitored, as determined by a cable burial risk assessment post consent.
Compliance with relevant regulator guidance	The proposed development will be compliant with the relevant regulator guidance noting that the DoT Guidance on Safety of Navigation & Emergency Response: Offshore Renewable Energy Installations (OREI) published by DoT in 2025 is generally aligned with UK MGN 654.
Guard vessel(s)	Where appropriate, guard vessels will be used to ensure adherence with advisory passing distances.
Liaison with IRCG in relation to SAR resources	The Developer will liaise with the IRCG in relation to SAR resources to ensure the Emergency Response Cooperation Plan (ERCoP) is in place post consent.
Lighting and marking	Lighting and marking of the array in agreement with Irish Lights and in line with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162. A separate LMP is provided in Appendix A17.3.
Marine coordination for proposed development vessels	Marine coordination will be implemented to manage proposed development vessels. A separate Vessel Management Plan (VMP) is provided in Appendix A17.2.
Marking on nautical charts	There will be appropriate marking of all offshore infrastructure associated with the offshore development area on UKHO Admiralty charts.
Proposed development compliance with international marine regulations	All proposed development vessels will comply with international marine regulations as adopted by the Flag State including International Regulations for Preventing Collisions at Sea (COLREGs) and International Convention for the Safety of Life at Sea (SOLAS). A separate VMP is provided in Appendix A17.2.

Measure	Mitigation detail
Promulgation of information	Information relating to the proposed development will be circulated via Notices to Mariners and other appropriate media including via the project Fisheries Liaison Officer (FLO) and Marine Notices (where deemed appropriate).
Structure Exclusion Zone	An area within the array area within which no surface piercing structure will be located inclusive of blade overfly. This area will ensure that a minimum 3.06nm gap between the Rockabill islands and the surface infrastructure is maintained. In practice, given the fixed nature of the layouts, the gap will be greater even when considering LoD/ micrositing principles.
Operation	
Advisory safe passing distances	Advisory safe passing distances may be deployed around ongoing work being undertaken by a maintenance vessel with notice of these promulgated through Notices to Mariners and Marine Notices (where deemed appropriate).
Cable protection	Cable protection (burial or external protection) will be implemented and monitored, as determined by a cable burial risk assessment post consent.
Compliance with relevant regulator guidance	The proposed development will be compliant with the relevant regulator guidance noting that the Irish Guidance published by DoT is generally aligned with UK MGN 654.
Guard vessel(s)	Where appropriate, guard vessels will be used to ensure adherence with advisory passing distances.
Lighting and marking	Lighting and marking of the array in agreement with Irish Lights and in line with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162. A separate LMP is provided in Appendix A17.3.
Marine coordination for proposed development vessels	Marine coordination will be implemented to manage proposed development vessels during operation. A separate VMP is provided in Appendix A17.2.
Marking on nautical charts	There will be appropriate marking of all offshore infrastructure associated with the offshore development area on UKHO Admiralty charts.
Minimum blade clearance	There will be a minimum blade clearance of more than 22 m above highest Astronomical Tide (HAT) in line with industry good practice and MGN 654. The lowest minimum blade clearance associated with the proposed development is 35m above LAT associated with selected WTGs for Project Option 2.
Proposed development vessel compliance with international marine regulations	All proposed development vessels will comply with international marine regulations as adopted by the Flag State including COLREGs and SOLAS.
Promulgation of information	Information relating to the proposed development will be circulated via Notices to Mariners and other appropriate media including via the FLO and Marine Notices (where deemed appropriate).
Structure Exclusion Zone	An area within the array area within which no surface piercing structure will be located inclusive of blade overfly. This area will ensure that a minimum 3.06nm gap between the Rockabill islands and the array is maintained. See Figure A17.3 of Chapter 17: Shipping and Navigation. In practice, given the fixed nature of the layouts and LoD/ micrositing principles, the gap will be greater.

Measure	Mitigation detail
WTG design and layouts	Consideration will be given to navigational safety and SAR with respect to WTG and layout design (with respect to the 500m LoD), including acceptable levels of SCADA systems.
Decommissioning	
Advisory safe passing distances	Advisory safe passing distances may be deployed around ongoing work being undertaken by a decommissioning vessel with notice of these promulgated through Notices to Mariners and Marine Notices (where deemed appropriate).
Buoyed decommissioning area	A buoyed construction decommissioning area around the array area will be implemented during the appropriate phases in agreement with Irish Lights as outlined in the LMP in Appendix A17.3.
Compliance with relevant regulator guidance	The proposed development will be compliant with the relevant regulator guidance noting that the Irish Guidance published by DoT is generally aligned with UK MGN 654.
Guard vessel(s)	Where appropriate, guard vessels will be used to ensure adherence with advisory passing distances.
Liaison with IRCG in relation to SAR resources	The Developer will liaise with the IRCG in relation to SAR resources to ensure the ERCoP is in place post consent.
Marine coordination for proposed development vessels	Marine coordination will be implemented to manage proposed development vessels. A separate VMP is provided in Appendix A17.2.
Proposed development vessel compliance with international marine regulations	All proposed development vessels will comply with international marine regulations as adopted by the Flag State including COLREGs and SOLAS.
Promulgation of information	Information relating to the proposed development will be circulated via Notices to Mariners and other appropriate media including via the project FLO and Marine Notices (where deemed appropriate).

There are no further changes to this section. Refer to Section 5.8.1 of Appendix 6.1 of the 2024 EIAR.

5.8.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.8.2 of Appendix 6.1 of the 2024 EIAR.

5.9 Offshore Archaeology and Cultural Heritage

5.9.1 Embedded Mitigation Measures

There are no changes to this section. Refer to Section 5.9.1 of Appendix 6.1 of the 2024 EIAR.

5.9.2 Mitigation and Monitoring Measures

Whilst there are no specific changes required to Table 12 of the 2024 EIAR, as a result of consultation with the National Monuments Service (NMS), specific mitigation measures will now be set out in a project specific Marine Archaeology Management Plan (MAMP) (see Appendix A18.3: Marine Archaeology Management Plan).

There are no further changes to this section. Refer to Section 5.9.2 of Appendix 6.1 of the 2024 EIAR.

5.10 Aviation and Radar

5.10.1 Embedded Mitigation Measures

The key changes to this section relate to the publication of the DoT guidance and the increase in the Structure Exclusion Zone due to the amendment of the Rockabill Gap. The relevant embedded mitigation measures in Table 10 of Appendix 6.1 of the 2024 EIAR should be disregarded and updated by the those outlined in Table A10 below:

Table A10 Embedded mitigation measures in relation to shipping and navigation (replaces Table 10 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation description
Construction	
Compliance with IAA lighting and marking requirements	The offshore infrastructure would be designed and constructed in accordance with the requirements of the IAA and the Commissioners of Irish Lights (CIL) in terms of the notification, charting, marking and lighting of obstacles in order to protect air and marine navigation. Refer to Section 19.4.5.1. for further details and Appendix A17.3: Lighting and Marking Plan.
Compliance with IAA requirements for the promulgation of obstacle locations	At least three months before the erection of offshore infrastructure, the required obstacle parameters will be supplied to the IAA and the CIL. Refer to Section 19.4.5.2 for further details.
WTG design parameters within aviation restricted zone	Project Option 2 WTGs within the 3nm buffer areas of Dublin Airport's ATCSMAC sectors 1 and 2 will have a reduced air draft and corresponding reduced tip height of 311m above LAT. This is to ensure that the minimum required obstacle clearances of sectors 1 and 2 are not infringed.
Compliance with relevant regulator guidance	The proposed development will be compliant with the relevant regulator guidance noting that the Irish Guidance published by DoT is generally aligned with UK Marine Guidance Note (MGN) 654. Refer to Chapter 17: Shipping and Navigation for further details.

Measure	Mitigation description
Consultation with the DoD Adherence to DoD issued NOTAMs and NtMs, and DoT issued Marine Notices	Prior to installation of the offshore export cable, engagement will be undertaken with the DoD and the following of NOTAMs, NtMs and Marine Notices relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with IAC firing range activities.
Operation	
Compliance with IAA lighting and marking requirements	The offshore infrastructure would continue to be lit during operation in accordance with the requirements of the IAA and the CIL in terms of the notification, charting, marking and lighting of obstacles in order to protect air and marine navigation. Refer to Section 19.4.5.1. for further details and Appendix A17.3.
Compliance with IAA requirements for the promulgation of obstacle locations	Within three months of construction completion, updated obstacle information will be supplied to the IAA and the CIL. Refer to Section 19.4.5.2 for further details.
WTG design parameters within aviation restricted zone	Project Option 2 WTGs within the 3nm buffer areas of Dublin Airport's ATCSMAC sectors 1 and 2 will have a reduced air draft and corresponding reduced tip height of 311m above LAT.
Compliance with relevant regulator guidance	The fixed layouts for Project Option 1 and Project Option 2 comply with Irish Coast Guard requirements with regards to SAR emergency access to the array area.
Decommissioning	
Compliance with IAA lighting and marking requirements	The offshore infrastructure would continue to be lit through the decommissioning phase in accordance with the requirements of the IAA and the CIL in terms of the notification, charting, marking and lighting of obstacles in order to protect air and marine navigation. Refer to Section 19.4.5.1. for further details and Appendix A17.3.
Compliance with IAA requirements for the promulgation of obstacle locations	Updated relevant information will be supplied to the IAA and the CIL, as detailed in Section 19.4.5.2.
WTG design parameters within aviation restricted zone	Project Option 2 WTGs within the 3nm buffer areas of Dublin Airport's ATCSMAC sectors 1 and 2 will have a reduced air draft and corresponding reduced tip height of 311m above LAT.
Compliance with relevant regulator guidance	The fixed layouts for Project Option 1 and Project Option 2 comply with Irish Coast Guard requirements with regards to SAR emergency access to the array area.

Measure	Mitigation description
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential impacts to aviation and radar receptors from the proposed decommissioning activities would be undertaken, considering the baseline environment at the pre-decommissioning stage. All mitigation measures to be captured would be captured within the decommissioning strategy within Appendix 6.1: Offshore Environmental Management Plan (EMP; hereafter Offshore EMP). Any licences or authorisations that might be required would be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

There are no further changes to this section. Refer to Section 5.10.1 of Appendix 6.1 of the 2024 EIAR.

5.10.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.10.2 of Appendix 6.1 of the 2024 EIAR.

5.11 Infrastructure and Other Users

5.11.1 Embedded Mitigation Measures

The changes to this section are a result of consultations with Marine Survey Office (MSO) and the commitment by the Developer to maintain the Structural Exclusion Zone to a minimum 3.06nm. Therefore, the only change in this section is to Table 14 of Appendix 6.1 of the 2024 EIAR which shall be updated with Table A11 below:

Table A11 Embedded mitigation measures in relation to infrastructure and other users (replaces Table 14 in Appendix 6.1 of the 2024 EIAR)

Measure	Mitigation detail
Construction	
Pre-construction surveys	Pre-construction surveys will be carried out that involve geophysical and magnetometer surveys used to identify existing assets. This may include out of service cables located in a different area to their chartered location due to outdated location techniques, which will reduce the risk of direct impacts or damage to subsea cables and pipelines during construction.
Structure Exclusion Zone	As part of managing potential impacts to shipping and navigation, the proposed development has incorporated a Structure Exclusion Zone, into the design. This is an area within the array which excludes all surface infrastructure (inclusive of blade overfly) and enables a minimum 3.06nm separation between surface infrastructure and the Rockabill islands to be maintained. This gap between the array area and the Rockabill islands is referred to as the Rockabill gap and provides sea room to facilitate the safe passage of vessels. Additionally, it is anticipated that potential other users of the Rockabill gap will be able to safely navigate in the presence of other activities.
Advisory safety zones	Advisory safety zones of up to 500m around infrastructure under construction will be communicated during construction. Where appropriate, guard vessels and/or guard buoys will also be used to ensure adherence to advisory safety zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction. An advisory safety zone of 50m will be implemented for incomplete structures at which construction activity may be temporarily paused.
Advanced vessel warnings	Details of the proposed development will be promulgated in advance of construction, via Notice to Mariners (NtM) to ensure mariners are aware of the planned works. This information will include associated advisory safety zones and advisory passing distances.
Updated nautical charts	The provision of relevant data and information will be provided to the relevant authorities/charting bodies for the updating of nautical and electronic charts.
Consultation with the DoD Adherence to DoD NtMs and/or Marine Notices	Prior to installation of the export cable, engagement will be undertaken with the DoD and the following of, NtMs (and/or Marine Notices) relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with Irish Air Corps (IAC) firing range activities.

Measure	Mitigation detail
Cable burial and cable protection measures	Exposed and/or inappropriately managed cables may potentially impact on vessels looking to anchor within proximity to the offshore development area. Export and inter-array cables will be buried where practicable to ensure they are not exposed by sediment movements (Section 8.3.10 in Chapter 8: Offshore Construction Strategy Chapter). Where cables cannot be buried, additional cable protection measures such as rock placement or mattressing will be applied to achieve adequate cable protection. Up to 20% of cable length is expected to need protection either during initial installation, or throughout the operational phase of the proposed development (see the Offshore Construction Strategy). Cable specification and installation measures will be determined pre-construction and will be included within a detailed Cable Burial Risk Assessment (CBRA), to enable informed judgements regarding burial depth to increase the likelihood of cables remaining buried whilst limiting the amount of sediment disturbance to that which is necessary. This sets out appropriate cable burial depth in accordance with industry good practice, reducing the risk of cable exposure. During construction, sections of export cable might be left exposed whilst awaiting a suitable method of installation. A temporary exclusion zone may therefore be required until the cable can be buried.
Vessel route management	Indicative transit corridors (vessel routing to and from construction sites and ports) will be define in advance of the construction phase, in consultation with the Marine Survey Office (MSO). A vessel management plan (VMP) will be implemented and will include a code of conduct for vessel operators. These measures will reduce the risk of disturbance and displacement of with infrastructure and other users. The VMP is provided in Appendix A17.2 and will be updated through the phases of the proposed development.
Marine pollution contingency measures – chemical risk review	Marine pollution contingency measures will be implemented as part of the offshore EMP to manage the risk of accidental spillages from construction equipment or collision incidents. This includes a chemical risk review with information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance. This measure will reduce the likelihood of potentially harmful pollutants to be released into the marine environment which may then impact on fish and shellfish receptors.
Operation	
Structure Exclusion Zone	The proposed development design has incorporated a Structure Exclusion Zone, an area within the array which excludes all surface infrastructure (inclusive of blade overfly) and enables a minimum 3.06nm separation between surface infrastructure and the Rockabill islands to be maintained. This gap between the array area and the Rockabill islands is referred to as the Rockabill gap and provides sea room to facilitate the safe passage of vessels. Additionally, it is anticipated that potential other users of the Rockabill gap will be able to safely navigate in the presence of other activities.
Advanced vessel warnings	Details of the proposed development will be promulgated in advance of any work that is not routine during operation via NtM to ensure mariners are aware of the planned works. This information will include associated advisory safety zones and advisory passing distances.
Advisory safety zones	Advisory safety zones of up to 500m around the relevant infrastructure will be communicated during substantial maintenance activities (such as major component replacement). Where appropriate, guard vessels and/or guard buoys will also be used to

Measure	Mitigation detail
	ensure adherence with advisory safety zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, maintenance and decommissioning phases. Such risks may include partially installed structures or cables, extinguished navigation lights or other unmarked hazards. An advisory safety zone of 50m will be implemented for incomplete structures at which construction activity may be temporarily paused.
Updated nautical charts	The provision of relevant data and information will be provided to the relevant authorities/charting bodies as/if required for the updating of nautical and electronic charts.
Consultation with the DoD Adherence to DoD issued NtMs and/or Marine Notices	Prior to management or repair of the offshore export cable, engagement will be undertaken with the DoD and the following of NtMs (and/or Marine Notices) relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with IAC firing range activities.
Decommissioning	
Structure Exclusion Zone	The proposed development incorporated a Structure Exclusion Zone, an area within the array which excludes all surface infrastructure (inclusive of blade overfly) and enables a minimum 3.06nm separation between surface infrastructure and the Rockabill islands to be maintained. This gap between the array area and the Rockabill islands is referred to as the Rockabill gap and provides sea room to facilitate the safe passage of vessels. Additionally, it is anticipated that potential other users of the Rockabill gap will be able to safely navigate in the presence of other activities.
Advanced vessel warnings	Details of the proposed development will be promulgated in advance of decommissioning via NtM to ensure mariners are aware of the planned works. This information will include associated advisory safety zones and advisory passing distances.
Advisory safety zones	Advisory safety zones of up to 500m around the relevant infrastructure will be communicated during decommissioning. Where appropriate, guard vessels and/or guard buoys will also be used to ensure adherence with advisory safety zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during decommissioning. Such impacts may include partially installed structures or cables, extinguished navigation lights or other unmarked hazards. An advisory safety zone of 50m will be implemented for incomplete structures at which construction activity may be temporarily paused.
Updated nautical charts	The provision of relevant data and information will be provided to the relevant authorities/charting bodies for the updating of nautical and electronic charts.
Consultation with the DoD Adherence to DoD issued NtMs and/or Marine Notices	Prior to decommissioning of the offshore export cable, engagement will be undertaken with the DoD and the following of NtMs (and/or Marine Notices) relating to Gormanston Danger Area EID1 will ensure that installation schedules do not conflict with IAC firing range activities.

Measure	Mitigation detail
Assessment of impacts and best practice environmental management	Prior to decommissioning a study of the potential environmental impacts to infrastructure and other users from the proposed decommissioning activities should be undertaken, taking into account the baseline environment at the pre-decommissioning stage. All mitigation measures to be captured would be captured within the decommissioning strategy within the Offshore EMP. Any licences or authorisations that might be required would be identified and obtained prior to decommissioning, including any validation, updating or new submission of an EIAR, as required.

There are no further changes to this section. Refer to Section 5.11.1 of Appendix 6.1 of the 2024 EIAR.

5.11.2 Mitigation and Monitoring Measures

There are no changes to this section. Refer to Section 5.11.2 of Appendix 6.1 of the 2024 EIAR.

5.12 Offshore Bats

5.12.1 Embedded Mitigation Measures

There are no changes to this section. Refer to Section 5.12.2 of Appendix 6.1 of the 2024 EIAR.

5.12.2 Mitigation and Monitoring Measures

In response to RFI Section 15 (f) and the incorporation of the 2024 offshore bat survey results and the request in RFI Section 1 (d) to provide an Operational Monitoring Programme (OMP), Section 5.12.2 of Appendix 6.1 of the 2024 EIAR shall be deleted and replaced with the following:

In response to RFI Section 15 (f) and following the incorporation of the 2024 offshore bat survey results and the refinements made to Impacts 3, 4, 6, 7 and 8, the assessment concludes that no significant effects on bats are predicted to occur during the construction, operation or decommissioning phases of the proposed development. On this basis, additional mitigation measures such as curtailment or feathering are not considered necessary or proportionate for the proposed development. Standard environmental management measures associated with construction, operation and decommissioning will be implemented as part of the wider project environmental controls.

There are no further changes to this section. Refer to Section 5.12.2 of Appendix 6.1 of the 2024 EIAR.

6. Training and Awareness

6.1 Overview

There are no changes to this section. Refer to Section 6.1 of Appendix 6.1 of the 2024 EIAR.

6.2 Personnel Induction Procedure

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2 (refer to Appendix A5.1 Design Refinements and Appendix A10.1: Marine Processes Review of Project Options). In the 2024 EIAR, WTG monopile foundations and OSP monopile and jacket foundations with pin piles were considered. Following design refinement in response to the RFIs, monopiles have been removed and WTG foundations will now be installed with suction buckets, and OSP jacket foundations installed with either drilled pin piles or suction buckets. Subsequently reference to the Pile Driving Procedure has been removed. Therefore, the subjects of relevance to the offshore works for inclusion within toolbox talks within Section 6.2 of Appendix 6.1 of the 2024 EIAR shall be deleted and replaced by:

Subjects of relevance to the offshore works for inclusion within toolbox talks may comprise, but are not limited to:

- The various mitigation protocols (i.e. Marine Mammal Monitoring Plan (MMMP));
- Archaeological Exclusion Zones (AEZs) and the necessary mitigation measures to be followed;
- Dealing with oil and chemical spills;
- Type of spill kits and their use;
- Storage and handling of hazardous material (according to Control of Substances Hazardous to Health (COSHH));
- Minimising waste;
- Waste separation, appropriate storage and Duty of Care;
- General good environmental actions and 'house-keeping';
- Environmental Incident Reporting; and
- Other consent constraints and considerations that a package of works may require to consider.

There are no further changes to this section. Refer to Section 6.2 of Appendix 6.1 of the 2024 EIAR.

6.3 Environmental Notices

There are no changes to this section. Refer to Section 6.3 of Appendix 6.1 of the 2024 EIAR.

6.4 Monitoring, Auditing and Reporting

There are no changes to this section. Refer to Section 6.4 of Appendix 6.1 of the 2024 EIAR.

7. Communications

7.1 Communication and Engagement

7.1.1 Internal Communication

There are no changes to this section. Refer to Section 7.1.1 of Appendix 6.1 of the 2024 EIAR .

7.1.2 Community Liaison and Stakeholder Liaison

There are no changes to this section. Refer to Section 7.1.2 of Appendix 6.1 of the 2024 EIAR .

7.1.3 External Communications

There are no changes to this section. Refer to Section 7.1.3 of Appendix 6.1 of the 2024 EIAR .

7.1.4 Advance Notice of Works

There are no changes to this section. Refer to Section 7.1.4 of Appendix 6.1 of the 2024 EIAR.

7.2 Environmental Complaints

There are no changes to this section. Refer to Section 7.2 of Appendix 6.1 of the 2024 EIAR.

7.3 Incident Reporting

There are no changes to this section. Refer to Section 7.3 of Appendix 6.1 of the 2024 EIAR.

7.4 Dropped Objects

There are no changes to this section. Refer to Section 7.4 of Appendix 6.1 of the 2024 EIAR.

8. Environmental Control Measures

There are no changes to this section. Refer to Section 8 of Appendix 6.1 of the 2024 EIAR.

8.1 Marine Pollution and Contingency Planning

There are no changes to this section. Refer to Section 8 of Appendix 8.1 of the 2024 EIAR.

8.2 Marine Species

There are no changes to this section. Refer to Section 8 of Appendix 8.1 of the 2024 EIAR.

8.3 Marine Archaeology

8.3.1 Archaeological Exclusion Zones

The key change to this section is the addition of more recent data and reports that have become available since submission of the 2024 EIAR. The new information has been reviewed and included to ensure the impact assessment is informed by the most current and up-to-date data, satisfying RFI Section 1 (b) and 14 (a).

Therefore, the only change in this section is to Table 15 of Appendix 6.1 of the 2024 EIAR which shall be updated with Table A12 below:

Table A12: AEZs within the offshore development area (replaces Table 15 in Appendix 6.1 of the 2024 EIAR)

Site ID	Description	UTM30N Easting	UTM30N Northing	Recommended AEZ buffer
WA7000	High value, potential for impact	289332	5946816	100m, clipped to MHW and overlapping AEZs
ADCO 03	High value, potential for impact	286121	5901164	100m, clipped to MHW and overlapping AEZs
ADCO 07	High value, potential for impact	289361	5946778	100m, clipped to MHW and overlapping AEZs
M 0142	High value, potential for impact	289385	5946700	150m, clipped to MHW and overlapping AEZs
WA7001	High value, potential for impact	289796	5946725	100m
WA7002	High value, potential for impact	297073	5949027	100m

WA7003	High value, no potential for impact	297403	5947223	None: outside the ECC boundary by c.450m
WA7004	High value, no potential for impact	297387	5947239	None: outside the ECC boundary by c.450m
WA7005	High value, no potential for impact	298783	5947415	None: outside the ECC boundary by c.450m
WA7006	High value, potential for impact	299034	5948785	100m
WA7007	High value, potential for impact	302666	5951085	100m
WA7008	High value, potential for impact	303126	5951304	100m
WA7009	High value, potential for impact	311154	5944559	100m
WA7010	High value, potential for impact	299052	5948791	None, covered by AEZ for WA7006
WA7011	High value, potential for impact	299029	5948771	None, covered by AEZ for WA7006
WA7012	High value, potential for impact	302665	5951077	None, covered by AEZ for WA7007
WA7013	High value, potential for impact	303061	5951326	100m

There are no further changes to this section. Refer to Section 8.3 of Appendix 6.1 of the 2024 EIAR.

8.3.2 Protocol for Archaeological Discoveries

The only change required to this section is the addition of a reference to the MAMP. Therefore, the paragraph with Section 8.3.2 of the 2024 EIAR shall be deleted and replaced in its entirety by the following:

The procedure to be followed on discovering any marine archaeology during the construction, operation and decommissioning phases of the proposed development are set out in the Archaeological Management Procedures (Appendix 6) and Appendix A18.3: Marine Archaeology Management Plan.

There are no further changes to this section. Refer to Section 8.3 of Appendix 6.1 of the 2024 EIAR.

8.4 Vessel Management and Other Marine Users

There are no changes to this section. Refer to Section 8.4 of Appendix 6.1 of the 2024 EIAR

8.5 Marine Invasive Non-Native Species

There are no changes to this section. Refer to Section 8.5 of Appendix 6.1 of the 2024 EIAR

8.6 Waste Management

8.6.1 General Waste Management Measures

There are no changes to this section. Refer to Section 8.6.1 of Appendix 6.1 of the 2024 EIAR.

8.6.2 Offshore Waste Management Measures

There are no changes to this section. Refer to Section 8.6.2 of Appendix 6.1 of the 2024 EIAR.

8.7 UXO Management Measures

As a result of the Developer committing to the use of NAS (e.g. bubble curtain or similar) if high order clearance is required, Section 8.7 shall be deleted and replaced in its entirety by the following:

During the construction of offshore wind farms in Europe, there is potential to encounter UXO originating from historical military action or modern munitions. This poses a health and safety risk where it may be located at or near the planned location of infrastructure and associated vessel activity, and therefore it is necessary to survey for and manage this risk.

Studies to date indicate the array area to be low risk and one area within the ECC near the coast in the southwest is considered medium risk of encountering UXOs (Alpha Associates, 2021). If UXOs are found, depending on their nature, they can be avoided by rerouting / relocating cables or foundations. If that is not technically feasible, high-order detonation; low-order deflagration; removal/ relocation; and other less intrusive means of neutralising the UXO may be employed. If high order detonation is required, the Developer has committed to the use of NAS (e.g. bubble

curtain or similar). A case-by-case risk assessment will be undertaken following dedicated geophysical surveys.

Where a target is confirmed as non-UXO the device may be recovered for onshore disposal where practicable.

The impact of detonating in situ on marine species has been assessed and appropriate mitigation measures and controls are provided in the Marine Mammal Mitigation Protocol (Appendix A14.5).

There are no further changes to this section. Refer to Section 8.7 of Appendix 6.1 of the 2024 EIAR.

8.8 Decommissioning Strategy

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2 (refer to Appendix A5.1 Design Refinements). Since the 2024 EIAR, monopiles have been removed as a foundation option for the WTGs and the OSP, and replaced by jackets on suction bucket foundations (SBJs) for the WTG, and SBJ or drilled pin piles for the OSP.

Therefore, Section 8.8 of the 2024 EIAR shall be deleted and replaced in its entirety by the following:

1. All structures above the seabed will be completely removed.
2. Foundations (be it suction buckets or pin piles) will be cut approximately 2m below the seabed and removed, with due consideration made of likely changes in seabed level across the array area (it is not thought to be reasonably practicable to remove the entire sub surface portion of the foundations from the seabed, as this may cause damage to the seabed environment, but endeavors will be made to ensure that the sections of pile or suction bucket that remain in the seabed are fully buried and made safe to ensure they do not become to stop protrusions and hazards).
3. Any scour protection will be left in situ and would only be removed if it was less impactful to do so.
4. Where appropriate, buried assets such as cables will be left in situ - Where discussions with stakeholders and regulators identify the need for cables to be wholly or partially removed, this would require the removal of seabed material or cable protection measures to allow access. Cable ends would be weighted and returned to the seabed and securely buried. The rock protection or concrete mattresses over the cables will only be displaced as much as necessary to remove the cables if requested by the authorities to do so at the time.
5. The landfall HDD ducting will be left in-situ, as its removal would not be reasonably practical and any efforts to do so would cause damage to the intertidal area and shoreline.
6. In the nearshore area of the export cable corridor (i.e. water depths < 10m), the export cables will be left in place in the seabed and should the portion of cable within the HDD ducting be removed, any exposed cable ends will be cut, sealed and securely buried.

There are no further changes to this section. Refer to Section 8.8 of Appendix 6.1 of the 2024 EIAR.

8.9 Rehabilitation Schedule

There are no changes to this section. Refer to Section 8.9 of Appendix 6.1 of the 2024 EIAR

9. References

There are no changes to this section. Refer to Section 9 of Appendix 6.1 of the 2024 EIAR.

APPENDIX 1 – Marine Pollution Contingency Procedure

There are no changes to this Appendix. Refer to Appendix 1 of the Offshore Environmental Management Plan of the 2024 EIAR.

APPENDIX 2 – Emergency Incident Response Procedure

There are no changes to this Appendix. Refer to Appendix 2 of the Offshore Environmental Management Plan of the 2024 EIAR.

APPENDIX 3 – Invasive Non-Native Species Management Procedure

There are no changes to this Appendix. Refer to Appendix 3 of the Offshore Environmental Management Plan of the 2024 EIAR.

APPENDIX 4 – Dropped Objects Procedure

There are no changes to this Appendix. Refer to Appendix 4 of the Offshore Environmental Management Plan of the 2024 EIAR.

APPENDIX 5 – Offshore Waste Management Procedure

There are no changes to this Appendix. Refer to Appendix 5 of the Offshore Environmental Management Plan of the 2024 EIAR.

APPENDIX 6 – Protocol for Archaeological Discoveries (PAD)

There are no changes to this Appendix. Refer to Appendix 6 of the Offshore Environmental Management Plan of the 2024 EIAR.

APPENDIX 8 – Offshore Decommissioning Strategy

There are no changes to this Appendix. Refer to Appendix 8 of the Offshore Environmental Management Plan of the 2024 EIAR.