Our Case Number: ACP-323575-25

An Coimisiún Pleanála

Karin Dubsky & Helena Shenk of Coastwatch (Irish Coastal Environment Group Coastwatch)
Wood Walls
Ballymoney
Co. Wexford
Y25Y894

Date: 11 November 2025

Re: Proposed extension of port facilities to support Offshore Renewable Energy ('ORE') development and ancillary works
at Port of Waterford, Belview, Co. Kilkenny. (www.250berth.portofwaterford.com)

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission and fee in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Commission will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of Kilkenny County Council and at the offices of An Coimisiún Pleanála when they have been processed by the Commission. .

More detailed information in relation to marine infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email marine@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,

pp

Honor Caird Marren
Executive Officer
Direct Line: 01-8049315

OA03

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SID

An Coimisiún Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a)	Observer's name	Karin Dubsky and Helena Shenk of Coastwatch (Irish Coastal Environment Group Coastwatch)
(b)	Observer's postal address	Wood Walls, Ballymoney, near Gorey, Co Wexford Y25Y894

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a)	Agent's name	NA
(b)	Agent's postal address	NA

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1	✓	**The agent at the postal address in Part 2**	☐

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

(a) An Coimisiún Pleanála case number for the current application (if available)

(for example: 300000)

OA10 323575

(b) Name or description of proposed development

Proposed ORE Capable Terminal on a 250m Wharf Extension & Ancillary Operation Support Infrastructure

(c) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

In a Natura 2000 site: the River Suir/River Barrow Nore confluence and on adjacent land in Co Kilkenny at Belview.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Values:

Waterford Harbour - the Barrow Nore Suir Estuary is thought to be the main early entry point into Ireland (Ref) and has one of the richest archaeological and historic records in the country.

Due to its unusual geology and its location it naturally has just about everything anyone could dream of for climate change adaptation and mitigation as well as estuarine biodiversity. This includes: winter upwellings at the mouth of the estuary between Hook and Brownstown head, one of the largest sprat spawning aggregations in the country. This bottom of food web is the biodiversity engine with many commercial fish, seals, birds and cetaceans feeding here.

The shores are lined by one of the largest honeycomb reefs in Europe, saltmarshes, mudflats and reeds beds. The estuary is of vital importance for several rare and threatened fish species and is protected as N 2000 sites because of that.

The educational and ecotourism value of this estuary is underdeveloped but has enormous potential.

Coastwatch is opposed to this port development on a number of grounds:

The offshore wind + port development are one unprecedented size and impact infrastructure development package incl (application FS005701 to DCEE, MARA MAC 20230001) where each part – the turbines – the port development with land reclamation and the consequent ongoing dredging requirement are likely to have the most serious combined impacts for this estuary has ever experienced.

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We are asked to submit on one part when the **wider planning frame is missing.** We do not have a national port strategy and are now seeing major port developments to service offshore wind competing with each other.

While here we are looking at one suite of impacts related to the inner estuary Port of Waterford plans, additionally there will be the impacts from capital dredging and ongoing maintenance dredging through the estuary and at the open sea end the Offshore wind development with cables in construction phase. Most recent Birdwatch tagging data confirms this as the main feeding area and flight path of a number of marine birds which are already threatened and in theory protected. Nature will be squeezed from both ends if this coupling of inner estuary port and offshore wind is chosen.

3. Alternatives:
Article 5(1)(d) of the EIA Directive requires the developer to provide a description of the 'reasonable alternatives' considered in the course of the application process. This appears to be missing. However even if the port produced alternatives we need to look at the larger SEA level alternatives.

We need the fundamental alternative considered - comparing the industrial development to an alternative estuarine management and restoration plan, which would set out to restore water quality (which is not meeting WFD standards), biodiversity (to bring the SACs to favourable conservation status) and compliance with the national Biodiversity Action Plan.

Envisaging an alternative future for the estuary with its archaeology and history of 1000 year old fish traps, eel migration into right this area of development etc. We could have as many jobs but in restoration, education and eco tourism, smaller scale sustainable fishing and related areas.

4. There are so many gaps, assumptions and weaknesses in this proposal - and on the other hand so much traditional knowledge and information in this estuary that we urge the Coimisiún to:

- hold an oral hearing and invite these knowledge holders to inform its decision.

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- visit the estuary now over coming weeks when the sprat season starts and the air and water are filled with wildlife trying to feed on them, as well as the local communities and saltmarshes, reed beds and other Nature based solutions which are prone to erosion with deeper shipping channels and more dredging .

We prepared a more detailed account of weaknesses and gaps are set out in the detailed referenced account below:

Case reference: OA10.323575

Coastwatch Criticism on the Proposed Port of Waterford Expansion for Offshore Wind Development

Coastwatch Europe

Research by Helena Shenk, with support from Karin Dubsky

November 3, 2025

In light of a proposed offshore wind development at the Port of Waterford, Belview, Co. Kilkenny, this document will outline and enumerate concerns regarding the environmental impacts of such an expansion. In some cases, there is inadequate information on which to base an assessment for development.

This development would require a 250 cubic meter wharf extension, partly on land and partly in nearshore habitat; the total development area would encompass approx 8 hectares, with "c.4.9ha within the existing land ownership of Port of Waterford, c.1.3ha of reclaimed area within the River Suir using reclaimed material and quarried rock, and c.1.8ha of a biodiversity enhancement area located to the northwest of the wharf development".

Issues:

1. With regards to public notice, the planning reports were published in four newspapers, but with no visual aids or maps to accompany the textual element. As a consequence most local citizens did not become aware of this application until well into the consultation period.

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2. In 2023, Inland Fisheries Ireland (IFI) raised concerns about construction impacts on aquatic animals and fish like lamprey and Atlantic salmon, including cumulative effects; IFI also sought assurance that there would no extensive interference with watercourses without consultation and agreement of the IFI, which would obligate site-specific methods planning and and referenced resources concerning fish ecological status and data. In response baseline ecological assessments of potentially affected habitats (marine, freshwater, and estuarine) were produced along with mitigation measures against dispersion of harmful materials to adjacent waters.

3. Proposed guidance for EU Port Strategies from Leibniz-Institute of Freshwater Ecology and Inland Fisheries emphasizes that ports and port expansions should not be undertaken in upper estuaries

4. Coastwatch believes that these are inadequate as detailed in some examples below. Without enough information, we cannot have confidence in impact assertions or the mitigation measures proposed.
Regarding two Annex 2 fish species for which this estuary is designated:
- The total lack of data and life history information for Twaite shad when in the estuary.
- The total lack of information on the sea lamprey use of the estuary outside some limited spawning site information and general time-of-year for spawning.
- The minimized importance of the dependence of river lamprey on the estuary during adulthood.
- There are repeated assertions that species are habituated to the level of activity and therefore a port expansion would have little to no material effect on species success.
- The assumption that aquatic species such as otters and fish will know to use natural breaks in construction works to pass through the estuary.
- Lack of information on larval fish and possible impacts of noise on larval fish.

5. No alternatives meaningfully considered
- "Accordingly, progression to Stage 3 of the Appropriate Assessment process (i.e. Assessment of Alternatives Solutions) was not considered necessary."

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Issues with Construction Phase:

- Demolition, capital dredging, land reclamation, and quay construction within close proximity to and in SACs → decreased water quality
- Dredging
    - 7000m3 of fluvial (river) sediment will be removed from the riverbed during the earlier half of months 6-9 of the construction phase
    - Heightened potential for sediment resuspension, pollution events, decreased foraging efficiency, elevated noise levels → risk assessment predicts this to have "no significant impact" on the conservation goals of the SACs; in contrast to already threatened or inconclusive conservation status
        - 2017 NPWS Lower River Suir Report (latest available) finds the SAC conservation status not favorable
        - 2025 NPWS River Barrow and River Nore Report (latest available) finds the SAC conservation status inconclusive
        - EPA Water Quality Report 2019-2024 found increased nitrates in relation to the Barrow, Nore, and Suir estuaries
    - With these three points in mind, it is difficult to establish the existence of a suitable baseline conservation status against which construction impacts can be compared, if conservation status is

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already under threat → advisability of such a protracted development comes under scrutiny when there is evidence to suggest strained ecosystem
    - This is pivotal → challenges assessment findings of little-to-no environmental impact because these findings stand on grounds of an assumed stable ecosystem
- Noise-impacts (dredging, piling)
    - "Construction noise can impact species such as otter and fish for which the SAC is designated"
        - disturbance, behavioural impacts, stress, displacement from feeding grounds, migration impacts
        - Underwater noise within water column travels much further than noise generated in air→ could reach off-site locations
        - Holts/couches not identified on or adjacent to Site, shoreline not suitable habitat for otter holts/couches; however, area provides commuting and foraging habitat, but assumed otters in the area habituated to human disturbance due to existing port → this is a concern because there are no behavioral studies included that support the idea that otters in the area are habituated to the disturbance
    - "Piling and dredging activities have the potential to generate underwater noise and vibration that could result in temporary disturbance or displacement of fish, particularly diadromous species such as salmonids during their migration periods"
        - "Underwater noise criteria are the subject of ongoing research. In many cases, species-specific data is sparse or does not currently exist and must be extrapolated from similar species" → acknowledged risk in undertaking Development with existing unknowns regarding fish hearing thresholds and underwater noise
        - "worstcase scenario, using 250dB SPLPeak, the potential injury zone fish species would be within a 180-200m range from the piling event" → this is a concern because there is little way of knowing where fish species are in the estuary during construction, and thus little way of knowing how many fish are being affected
        - "Impact piling, which represents the worst-case event with predicted peak source levels up to **250dB re 1µPa @ 1m**. Other activities such as dredging, vessel movements, support vessels, jack-up barge operation and vibratory piling will generate lower noise levels (typically **150–170dB re 1µPa @ 1m**)... Therefore, as otter are designated for Lower River Suir SAC and the River Barrow and River Nore SAC, further consideration for potential noise effects will be required. In addition, designated fish species are also known to utilise the Lower Suir Estuary and the Waterford Estuary. Similar to otter, underwater noise emissions could result in effects on fish within the immediate vicinity of the Site." →

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acknowledgement that impact piling, which produces worst-case scenario with 250dB SPLPeak, can and likely will affect designated fish species and otter that are using the affected area of the estuary

- "any potential disturbances to fish will be very localised and restricted to the immediate vicinity of operations" → seems somewhat flawed to conclude that disturbances resulting from capital dredging cannot have rippling effects beyond the immediate vicinity; complex estuarine ecosystems do not abide by simply-defined, predictable boundaries and rarely remain unaffected by surrounding activity
- "It can be expected that fish species can swim at normal or burst speeds (typically up to seven body lengths per second) away from any sudden disturbance in their immediate vicinity. Therefore, the entrainment of fish during the capital dredging was therefore considered unlikely, as any fish that may be disturbed will move to adjacent areas to avoid the disturbance" → **neglects planktonic larval fish that are largely transported by water column and cannot move independently**
- In the risk assessment, noise impact on eggs/larval phase considered only on a basis of mortality, not injury → this is concerning, since noise can impact long-term viability, and there is a high proportion of larval fish following spawning times (which construction works will overlap with since the construction phase is estimated 18-24 months)
    - There is some consideration given to decibel thresholds, but unclear whether frequency/pitch thresholds have been included in assessment → this is concerning because frequency/pitch is a significant factor in noise disturbance and resulting behavioral change in many species
    - It is unclear whether measures will be taken to lessen noise during peak spawning times, especially for vulnerable populations
- Previous study on Dutch offshore windfarms and pile-driving effects on fish:
    - "An existing egg and larval transport model (Bolle et al. 2009) was expanded, with the assumption that egg and larval mortality might occur in a 1-km radius around a pile-driving site. This effect range was presumed to be a worst-case scenario based on the limited information available at that time (e.g., the US FHWG criteria). The **results indicated that offshore pile driving could cause an ecologically significant reduction in the number of fish larvae that reach the Natura 2000 sites.**"

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- "limited results available to date provide a first indication that injuries or mortality in fish larvae and juveniles may not occur at SELcum values below 207 dB re 1 µPa2·s and SPLz-p values below 204 dB re 1 µPa2 (Table 11.2). Further work on other species is required before these findings can be extrapolated to fish (larvae) in general. Moreover, the research to date has mainly focused on injury and mortality assessments, whereas **sound exposure may also affect physiology or behavior and hence predation and starvation risks**" → even if injury or mortality does not occur due to piling works, there is still research needed to determine how noise exposure affects behavior, physical development, and risk of affected fish becoming more vulnerable to predation and starvation

- Artificial lighting
  - Lighting required (especially in winter months); extensive lighting already in use at the port and assumed marine life habituated → another assumption that minimizes role of expansion project in light pollution

Concerns regarding aquatic species and population health during Construction and Operational Phases

- Lower River Suir SAC home to Annex II species: Freshwater Pearl Mussel, Otter, White-clawed Crayfish, Salmon, Twaite Shad and three species of Lampreys– Sea, Brook and River Lamprey
- 2016 and 2019 WFD surveillance monitoring carried out by IFI concluded ecological status of fish in Waterford Estuary was of 'good' status [60, 61]; IFI designated Barrow-Nore-Suir Complex as having 'good' status in 2022 [68]" → this status could be threatened by development, and as previously mentioned, the latest available NWPS reports found overall conservation status of the River Suir, River Barrow, and River Nore either inconclusive or "not favorable" (see [13,14])
- European eel are not mentioned in the assessment despite their designation as an internationally important fish species
  - Eel traps and eel populations near area of proposed development
  - European eel are critically endangered
- **April and May:** spawning adult Twaite shad enter lower River Barrow in vicinity of St. Mullins; **peak activity in May** with eggs hatching shortly afterwards, young shad drifting into Waterford Estuary proper in relatively low salinity conditions → construction works will overlap with migration
  - One of only three known Irish spawning grounds for Twaite Shad
  - Conservation status is vulnerable; population threatened by barriers to upstream migration and water quality degradation → the Development would represent a physical barrier to migration and cause of water quality degradation
  - Significant lapses in knowledge of the ecological needs of this species during breeding season → this is concerning, since it is

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difficult to definitively determine that the Development will have little-to-no significant impact on their population
    - 2025 study concluded that "beyond preventing local habitat alterations, broader river and basin-scale measures are essential" in order to facilitate adequate Twaite Shad access to spawning sites → expansion would represent a significant habitat alteration
    - Maintaining habitat quality requires sufficient flow patterns and sediment supply, as well as continuous water quality and temperature monitoring → dredging is of concern, since it directly impacts sediment supply and flow patterns
    - There should be further consideration as to whether the proposed location of the expansion may impact spawning success
- Sea-bound **Atlantic salmon** smolt feed during migration through Waterford Estuary over a period of one to several days → significant uncertainty regarding length of migration, which makes it difficult to definitively conclude that there will be little-to-no significant impact on population
    - Duration of return migration of maturing adult salmon and presence in estuary dependent on flows from natal river; prolonged residence in Waterford Estuary during droughts/limited freshwater flow in rivers, while passage is rapid when freshwater flows sufficient to facilitate entry and migration in natal river → the stress of construction and/or decreased habitat after construction combined with drought would have a significant impact on salmon populations
    - **Spring months:** early running multi-sea-winter (MSW) fish enter natal rivers; one-sea-winter ('1SW') and MSW summer fish enter their natal rivers during the **summer months** → construction works will overlap with migration
    - Mature adults on their return migration do not feed within the estuary during their migration. Therefore, it can be stated that they have very little dependency on the estuarine environment" → defining dependency through the lens of feeding seems a bit short-sighted, as estuaries are still **providing crucial passage to natal rivers**
- **Late spring months**: spawning adult **sea lamprey** migrate through Waterford Estuary to freshwater spawning habitat → construction works will overlap with migration
    - **May and June:** spawn in shallow flowing water habitat with stony substrate
    - **Juveniles** (ammocoetes) spend several years in silty substrates before metamorphosing during autumn months, and migrating downstream to sea
    - Metamorphosed lamprey have been recorded in Waterford Estuary during November fish impingement studies at Great Island; believed to migrate rapidly through estuary to open sea where they enter parasitic stage → this is concerning, since potential impacts on present sea lamprey populations are not heavily considered
    - "Considered to have at least regional populations from which adults ascend into suitable spawning rivers, which are not necessarily their

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natal river to spawn and die" → this is concerning, since even if it is assumed that fish species in the area are habituated, lamprey originating from other rivers who migrate through the estuary will not be habituated

- **Early spring months:** spawning adult **river lamprey** migrate through Waterford Estuary to freshwater spawning grounds → construction works will overlap with migration
    - **April and May:** spawn in shallow flowing water habitat with stony substrate
    - Juveniles (ammocoetes) spend several years before metamorphosing and migrating downstream to sea during **spring months**
    - Metamorphosed lamprey have been recorded in Waterford Estuary during November fish impingement studies at Great Island, adults have been recorded during June fish impingement studies → this is concerning, since impacts on river lamprey are not heavily considered
    - River lamprey spend entire adult lives in estuarine/coastal environments where they enter parasitic stage– **highly estuary-dependent during adulthood** → this is concerning, since estuary dependence means there will be a high proportion of river lamprey in the estuary during construction works, which is not heavily considered
    - No evidence adults return to natal rivers to spawn; likely regional populations which spawn in many local rivers → under the assumption of the assessment that fish species in the area are habituated to high activity, regional individuals who do not originate from Waterford Estuary will not be habituated
- Sprat spawning season → significant occurrences of dolphin
    - No mention of dolphin in risk assessment

Concerns regarding avian species and population health during Construction and Operational Phases

- BirdWatch Ireland data
    - Black-legged Kittiwake and European Herring Gull populations meet criteria for IBA (Important Bird and Biodiversity Areas) at Mid Waterford Marine Extension → turbines could potentially restrict this central wintering habitat for seabirds
    - Kittiwake are listed as having a red conservation status and European Herring gull are listed as having an amber conservation status

Listed mitigation measures for Construction Phase

- "works will be limited to 07:00 and 19:00 hours Monday to Friday inclusive and 07:00 and 14:00 hours on Saturdays, and pile installation works will be limited to 08:00 – 18:00 Monday to Friday, and 8:00 – 14:00 on Saturdays" → high activity and disturbance for the majority of the time
- "Natural breaks in activity"→ assumed that otter and fish will use these breaks as opportunities to move through area → this is concerning, since

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there are little-to-no behavioral studies included that support aquatic species will know to use these breaks as opportunities for movement/migration

- Terrestrial noise assessment: predicted range of sound pressure levels from the construction will be 59-67dB, lower than thresholds that would cause harm to otters → there may not be physical harm caused, but there is still a possibility of behavioral impacts
- Works area will be temporarily unavailable to otters during construction (especially piling) → "alternative habitats within the wider estuary and coastal zone will remain accessible, ensuring that foraging and feeding opportunities will continue" → this is concerning, since there is no guarantee that otters will know or decide to use other areas, and could possibly increase intraspecific competition for resources
    - "works were not predicted to affect the breeding success or the overall population of otters within the area" → assumption but little/no reference to behavioral studies
    - Mitigation measures and best-practice construction "will ensure that no direct impacts to individuals will occur" → somewhat vague assurance without actual guarantee
    - Consultation with the NPWS will be undertaken prior to construction to determine and secure derogation licence → permission to undertake activities that may otherwise harm conservation status of these species
    - Reiteration of assumption that species are habituated to the noise and activity or will avoid the area, and that there will be resumed reoccupation, return to baseline levels of activity after works are completed
- Assertion that impacts will be "localised and temporary in nature" → seems to imply that the impacts can simply be isolated to one locale, regardless the interconnectivity of an estuary ecosystem, as if the effects will exist in a vacuum
- **Pre-Start Monitoring**
    - Visual monitoring of marine mammal species; pile-driving will not commence if marine mammal species present in Monitored Zone and will not commence until 30 minutes elapsed with no marine mammal sighting in Monitored Zone → reliant on visual confirmation, which is not always possible and will not guarantee safety of marine mammals
    - Followed by Ramp-Up Procedures
- **Ramp-Up Procedures**
    - "Controlled build-up of acoustic energy output" over ramp-up period; "once an appropriate and effective Ramp-Up Procedure commences, there will be **no requirement to halt or discontinue the procedure… if marine mammals occur within the Monitored Zone**" → this is concerning, since marine mammals are still liable to be knowingly exposed to sound levels that cause harm
- **Biodiversity Enhancement Area Proposed Works**
    - Not much mentioned in the way of conserving fish species

Operational Phase

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- Operational noise emissions "may cause temporary behavioural responses in otter, fish and marine mammals; however, as these levels are already characteristic of port operations, additional impacts were predicted to be minor and localised" → **repeated assumption of minor and localized impacts without included behavioral studies**

IGB Feedback on current EU Port Strategy

- Leibniz-Institute of Freshwater Ecology and Inland Fisheries (IGB)
- Harbours cause habitat fragmentation, migration barriers for migratory species (especially fish)
- Sink effect: the increased sedimentation → excessive fertilisation → algal and bacterial blooms → oxygen depletion → waterbodies hostile to life and no longer passable
- Wide open areas of stagnant water and metal sheet pile walls + solar radiation → heating → evaporation and unavailability of water
- Ports and port expansion in upper estuaries very damaging → prioritize development in marine ports instead

Other concerns

- Slight concern that the existing impact of intensive agricultural and industrial runoff could be wielded to draw criticism away from possible environmental implications of the proposed development
    - Page 52 of the Screening and Stage 2: Natura Impact Statement, a brief statement is made describing the threat of fertilizer and slurry discharge to the SAC conservation status → agricultural/industrial discharge represents a significant part and perhaps a plurality of the environmental threat, but **does not exempt** port expansion from effecting major negative change on the SAC that could **compound existing harm**
    - Page 80: further description of existing polluting industries surrounding the port, which contribute to the conclusion that no significant compounding impacts will arise → if it is to be understood that the waters are already polluted by anthropogenic activities, then it can be proposed that dredging polluted estuarine habitat could have negative effects
        - E.g. releasing anoxic sediments into oxygenated waters and result in particle surface reactions, which would have the effect of mobilizing toxic trace elements and influencing phytoplankton community structure

Conclusions/recommendations:

- Port expansion is important for hitting offshore wind targets and renewable energy goals
- Compromised conservation status of River Suir, River Nore, and River Barrow
- IGB Feedback on EU Port Strategy
- Ireland's port policy outdated, has been under review for two years

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- Further consideration toward spawning/breeding seasons for marine life, especially Twaite Shad and otters
- Ensure Twaite Shad access to spawning sites, since Waterford Estuary is one of only three known sites in Ireland
- Challenge overall framing of Development as a potential compounding harm rather than a benign extension of existing human activity → increased focus on limiting environmental impact/looking for alternative solutions
- Worst-case scenario is a cascading effect up the food chain: forage fish populations dwindle due to larval, juvenile, and adult injury/mortality; decrease in foraging opportunities for marine mammals and birds and causing further decline in populations; possibly compounded by turbines obstructing seabird wintering habitat

References

Stage 1: Appropriate Assessment - Screening and Stage 2: Natura Impact Statement. Proposed Offshore Renewable Energy ('ORE') Capable Berth on a 250m Wharf Extension & Ancillary Operational Support Infrastructure. Port of Waterford Company, Port of Waterford, Belview, Co. Kilkenny.

Carton, J.G., Duggan, B., & Doody, J. (2025). Missing the Boat: Port Infrastructure as a Critical Barrier to Offshore Wind Energy Development in Ireland. https://publicpolicy.ie/environment/missing-the-boat-port-infrastructure-as-a-critical-barrier-to-offshore-wind-energy-development-in-ireland/

IGB FEEDBACK on EU Ports Strategy: Better consideration of environmental impacts (IGB, Berlin, 2025). https://www.igb-berlin.de/sites/default/files/media-files/download-files/igb_feedback_eu_ports_strategy.pdf

NPWS. Application for Derogation. https://www.npws.ie/licensesandconsents/disturbance/application-for-derogation

BirdLife International (2025) Site factsheet: Mid Waterford marine extension. https://datazone.birdlife.org/site/factsheet/49421-mid-waterford-marine-extension

BirdWatch Ireland. Kittiwake. https://birdwatchireland.ie/birds/black-legged-kittiwake/

BirdWatch Ireland. Herring Gull. https://birdwatchireland.ie/birds/herring-gull/

Bolle, L.J. et al. (2016). Effect of Pile-Driving Sounds on the Survival of Larval Fish. In: Popper, A., Hawkins, A. (eds) The Effects of Noise on Aquatic Life II. *Advances in Experimental Medicine and Biology,* vol 875. Springer, New York, NY. https://doi-org.ezproxy.bu.edu/10.1007/978-1-4939-2981-8_11

Cabria, M. (2014). Phytoplankton community indicators of changes associated with dredging in the Tagus estuary (Portugal). Environmental pollution, 191(17-24). https://doi.org/10.1016/j.envpol.2014.04.001

5. Grounds

NPWS. Lower River Suir SAC. Conservation objectives supporting document - Coastal habitats. Version 1, March 2017.

NPWS. River Barrow and River Nore SAC. Conservation objectives supporting document - Marine Habitats. Version 2, March 2025.

EPA Water Quality Report 2019-2024. Monitoring & Assessment: Freshwater & Marine Publications. https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-in-ireland-2019-2024.php

Negro, G., Lesa, D. et al. (2025). Mesohabitat Spawning Preference of the Anadromous Twaite Shad (Alosa fallax, Lacépède 1803) in the Tagliamento River (Italy). *Ecohydrology,* 18 (1). https://doi.org/10.1002/eco.70010

Environmental Impact Assessment Report (EIAR) – Volume 2, Chapter 1 – Introduction. Proposed ORE Capable Terminal on a 250m Wharf Extension & Ancillary Operational Support Infrastructure. Port of Waterford Company, Port of Waterford, Belview, Co. Kilkenny.

Planning Context Report. Proposed ORE Capable Terminal on a 250m Wharf Extension & Ancillary Operation Support Infrastructure, Port of Waterford. Belview, Co. Kilkenny. Applicant: Port of Waterford Company

The Maritime Heritage of Waterford Estuary. An Overview of Heritage Features & Opportunities. https://www.portofwaterford.com/wp-content/uploads/2022/07/Maritime_Heritage_of_Waterford.pdf.

European Eel. Inland Fisheries Ireland. https://www.fisheriesireland.ie/fish-species/european-eel-anguilla-anguilla

Irish Dolphin and Whale Group. https://iwdg.ie/waterford-still-the-place-to-be/

Supporting materials

6. If you wish, you can include supporting materials with your observation. Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the "Yes, I wish to request an oral hearing" box below.

You can find information on how to make this request on our website or by contacting us.

If you do not wish to request an oral hearing, please tick the "No, I do not wish to request an oral hearing" box.

Yes, I wish to request an oral hearing	**Yes** ☐
No, I do not wish to request an oral hearing	☐

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes