

## Suzanne Cleary

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**From:** Daniel O'Connor  
**Sent:** Wednesday 28 January 2026 14:43  
**To:** Suzanne Cleary; Shirley Connolly  
**Subject:** FW: Case 323895 WID Submission  
**Attachments:** WID Sub 323895 Ros Ui Mhil complete.pdf

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**From:** Appeals2 <[appeals@pleanala.ie](mailto:appeals@pleanala.ie)>  
**Sent:** Wednesday 28 January 2026 10:11  
**To:** Daniel O'Connor <[danieloconnor@pleanala.ie](mailto:danieloconnor@pleanala.ie)>  
**Subject:** FW: Case 323895 WID Submission

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**From:** Sabrina Joyce <[sabrina.joyce@gmail.com](mailto:sabrina.joyce@gmail.com)>  
**Sent:** Tuesday 27 January 2026 17:18  
**To:** Appeals2 <[appeals@pleanala.ie](mailto:appeals@pleanala.ie)>; Elizabeth Davidson <[secretary.wildirelanddefence@gmail.com](mailto:secretary.wildirelanddefence@gmail.com)>  
**Subject:** Case 323895 WID Submission

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Good Evening,  
Further to my telephone conversation with Daniel in Appeals section today, please find enclosed a submission from Wild Ireland Defence CLG.  
Best regards  
Sabrina Joyce-Kemper

cc. Elizabeth Davidson - Wild Ireland Defence.

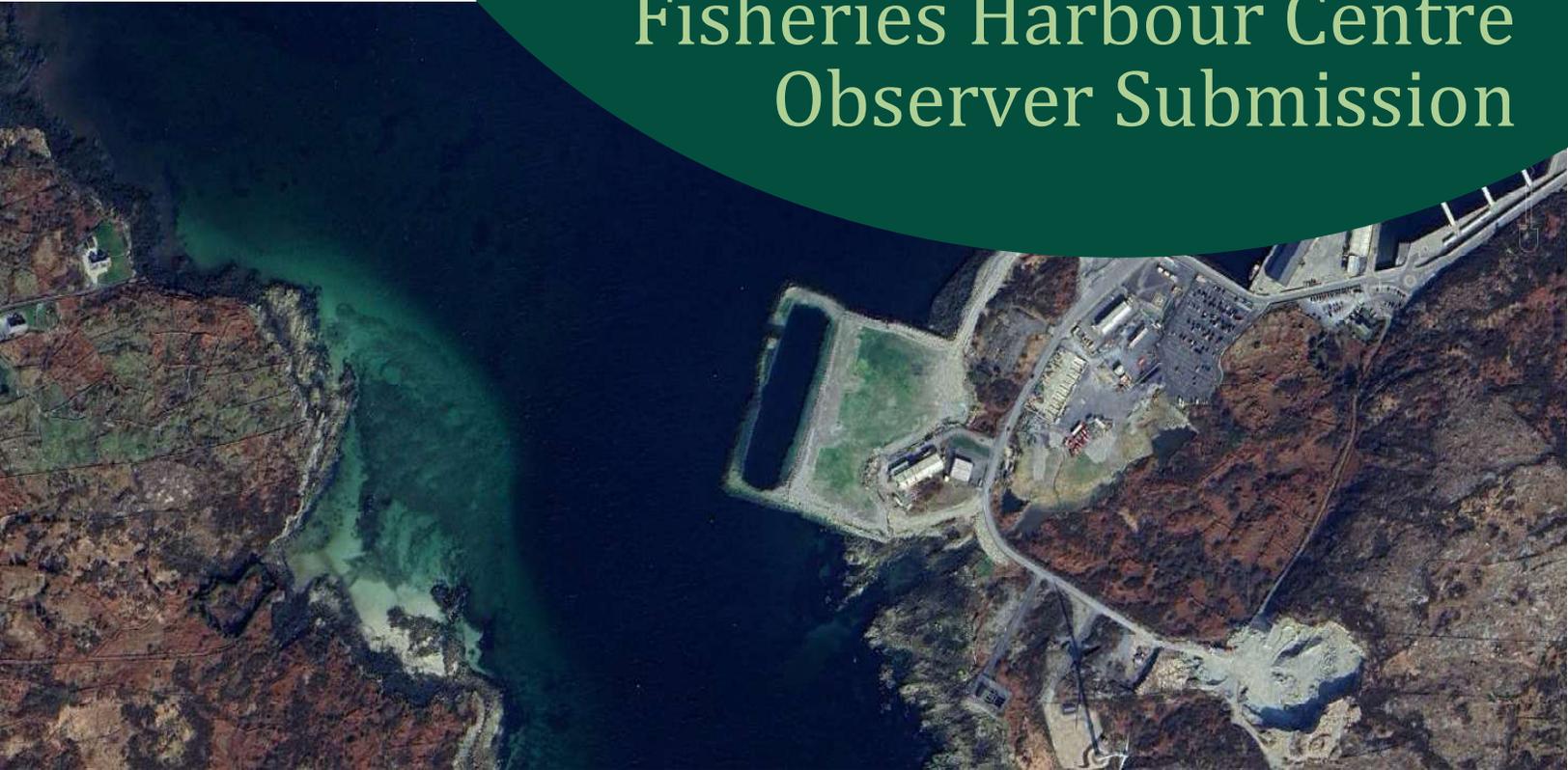
# An Coimisiún Pleanála

## Case ref: 323895

### Ros a' Mhíl

## Fisheries Harbour Centre

## Observer Submission



Satellite Image by Google Earth 18<sup>th</sup> March 2025

#### Planning submission submitted by:

Wild Ireland Defence CLG  
5 Eaglewood House  
Rochestown Avenue  
Dun Laoghaire  
Co. Dublin  
A96 X213

Date of Submission: 27<sup>th</sup> January 2026

# Submission

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## 1. Introduction

- 1.1 Wild Ireland Defence CLG is an organisation dedicated to education, advocacy and legal action in the protection, conservation, preservation and defence of the natural environment, and of the species and habitats that depend upon it. A core purpose of the organisation is to uphold, promote and seek compliance with the domestic and European Union legal frameworks governing environmental protection.
- 1.2 Wild Ireland Defence CLG makes this submission in its capacity as an observer in order to ensure that the application for substitute consent is examined and determined in strict accordance with applicable European Union and national environmental, planning and development law, and that the statutory protections afforded to the environment and protected species are fully respected and enforced.
- 1.3 Wild Ireland Defence CLG has commissioned Sabrina Joyce-Kemper, Planning and Environmental Consultant, to review the application and to provide an expert assessment of the matters arising. Ms Joyce-Kemper has examined the material as submitted and has prepared the brief summary set out below, which Wild Ireland Defence CLG adopts and endorses in full. Ms Joyce-Kemper holds an Advanced Diploma in Planning and Environmental Law from the Honourable Society of King's Inns.
- 1.4 This assessment is necessarily limited in scope. Wild Ireland Defence CLG's position is that the application, as currently framed, fails to address the entirety of the development from the baseline position before unauthorised works were carried out which are the subject of the substitute consent 323827 and does not encompass the full extent of the unauthorised development at Ros an Mhíl Fisheries Harbour Centre (FHC). In those circumstances, a comprehensive assessment is not possible, and Wild Ireland Defence CLG considers that a substantially revised and/or new application is required, once a decision in 323827 has been made.
- 1.5 This WID observation is relating to an application under Section 37L for development per case reference 323895 which is described on the An Coimisiún Pleanála case page / portal as follows<sup>1</sup>;
- Application for development pursuant to Section 37L of the Planning and Development Act 2000 (as amended) for Deep Water Quay development as previously permitted by Galway County Council ref 17/967 An Environmental Impact Assessment Report (EIAR) and A Natura Impact Statement (NIS) has been submitted as part of this application.*
- 1.6 This submission is made by Wild Ireland Defence CLG in response to significant omissions and deficiencies in the application documentation relating to impacts on protected species and habitats under the EIA Directive, Habitats Directive and Birds Directive, and on surface waters

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<sup>1</sup> <https://www.pleanala.ie/en-ie/case/323895>

and coastal waters protected under the Water Framework Directive. The submission seeks to request invalidation and/ or refusal of the application in the first instance, or without prejudice to that argument, in the second instance to await the decision in 323827 and incorporate into this application if subsequent to the decision this application is still valid and or The commission still has jurisdiction to consider it.

- 1.7 As currently presented, the application with its arbitrary limitation of the development concerned, contains material omissions which prevent the carrying out of a complete, precise and scientifically robust Appropriate Assessment and Environmental Impact Assessment. The deficiencies identified are such that the Commission cannot, on the basis of the information provided, reach definitive findings or conclusions of no significant effect on Natura 2000 sites, as required by EU law. In several instances, there is no current scientific or evidential material before the Board capable of substantiating the screening conclusions reached by the applicant in the Appropriate Assessment Screening report or relied upon in the Natura Impact Statement. Accordingly, the documentation on file is insufficient to support the determinations sought, and further information is required before any lawful assessment or decision can be made.
- 1.8 The final date for submission is 28<sup>th</sup> January 2026 (within 8 weeks from date of application on the 19<sup>th</sup> of January 2026), as the submission date for this observation has the benefit of additional days per Section 251 (holiday rule) and weekend rule as per the Commissions 'Guide to Christmas opening booklet'.<sup>2</sup> WID are also an observer on 323827 as this is an extension to the original Substitute consent

## **2. Direct planning history relevant to this application.**

- 2.1 Planning permission for the Ros an Mhíl Deep Water Quay was granted by Galway County Council on 2 April 2018 under planning reference 17/967. That permission authorised a defined and integrated project comprising a new quay wall, land reclamation, dredging works, and associated marine construction, all as assessed in the Environmental Impact Assessment (but not Appropriate Assessment) process undertaken at that time.
- 2.2 In April 2022, the Department of Agriculture, Food and the Marine, as applicant, sought an extension of duration under section 42 of the Planning and Development Act 2000 (as amended) by way of application reference 22/460. That application was refused on the lawful basis that no development had been substantially carried out, a statutory precondition for the exercise of the section 42 power.
- 2.3 Notwithstanding the absence of any valid extension, a business case was approved and a construction contract was awarded in or about October 2022. Physical works commenced on site in January 2023, while the original permission remained extant but approaching expiry.

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<sup>2</sup> <https://www.pleanala.ie/getmedia/2399a5ab-649c-4484-8713-991d9ec355d0/Guide-to-Christmas-Opening-Booklet-2025-2026.pdf?ext=.pdf>

- 2.4 On 26 May 2023, an application purporting to seek an extension of permission was lodged under reference 23/60548. That application was deemed invalid but the applicant was not advised as such until the 12<sup>th</sup> of July 2023. On or about 29 May 2023, a further (concurrent?) application was made under reference 23/218, seeking to extend the duration of the original permission. This extension of permission was granted on 11<sup>th</sup> July 2023. That decision was subsequently challenged by way of judicial review and was quashed by an order of certiorari perfected on 11 November 2024 in proceedings bearing record number 2023/1007JR which were initiated in September 2023. As a matter of law, that decision must be treated as having never had legal effect.
- 2.5 The original permission 17/967 expiration date was 1<sup>st</sup> of April 2023 taking into account the applicants claim of an additional 101 days, the claimed expiration date is 11<sup>th</sup> July 2023 as was the impugned planning decision date for extension 23/218, which was subsequently quashed. However the permission as granted under 17/967 was not completed in accordance with the consent on either the 1<sup>st</sup> of April 2023 or 11<sup>th</sup> of July 2023. Development works continued thereafter until May 2024.
- 2.6 The Commission are currently reviewing substitute consent for works carried out between 11 July 2023 and 20 May 2024 only under 323827 which is effectively the unconsented parent permission to this, a separate application under section 37L 323895) seeking permission to complete the remainder of the project. Attached (**Attachment 2.1**) please find the Submission Wild Ireland Defence CLG made to the substitute consent application. We ask the inspector and Board to consider this appendix as part of our submission to the instant case 323895 and the issues that arise and the observations in that submission are carried over into this submission. Effectively WID are of the opinion that this application is not valid and ACP do not have the jurisdiction to grant consent on either the parent permission or this expansion to the parent permission as the full extent of the development works have not been identified, assessed and mitigated against for all any any assessment that must be statutorily carried out by An Coimisiún Pleanála.

### **3. Current legal landscape governing substitute consent and Section 37L**

- 3.1 Part XA of the Planning and Development Act 2000 was introduced to address Ireland's failure to comply with the Environmental Impact Assessment Directive in respect of unauthorised development. It constitutes a strictly limited and exceptional remedial regime, not a parallel or alternative planning system.
- 3.2 Section 177E(1) provides that an application for substitute consent may be made only in respect of development carried out without the required environmental assessment. Section 177K strictly governs the Board's jurisdiction to grant such consent.

Section 177K(1) provides:

*“The Board may grant substitute consent in respect of a development where;*  
*(a) the Board is satisfied that exceptional circumstances exist which justify the grant of substitute consent, and*  
*(b) the Board has carried out an environmental impact assessment or appropriate assessment, or both, in respect of the development.”*

- 3.3 Section 177K(1J) further restricts what may constitute exceptional circumstances, including, at subsection (b), circumstances where the applicant “could not reasonably have known” that the development required assessment.
- 3.4 This regime transposes the requirements of Directive 2011/92/EU (as amended) as interpreted by the Court of Justice of the European Union, which has consistently held that retrospective consent may be permitted only as an exception, and must not have the effect of circumventing the preventive purpose of environmental assessment.
- 3.5 Where a development relies upon a parent permission that has expired, and where works carried out thereafter are unauthorised and subject to a pending substitute consent application, the Board’s jurisdiction is constrained in the following ways.
- 3.6 As per above once a planning permission has expired and any purported extension has been quashed, that permission must be treated as having no continuing legal effect. Any development carried out after expiry is unlawful unless and until substitute consent is granted under Part XA. Until that occurs, there is no lawful baseline permission upon which a further or “completion” application can be anchored.
- 3.7 Also per above the substitute consent regime under Part XA is exclusive and exceptional. It exists precisely because Ireland failed to ensure that development subject to EIA and Appropriate Assessment was consented before works commenced. EU law tolerates that failure only on the strict condition that remedial assessment is carried out before any further consent is given and only where exceptional circumstances are established. Allowing a prospective consent application to proceed in parallel, under section 37L, would undermine the remedial logic of Part XA and circumvent the statutory safeguards built into sections 177E–177K.
- 3.8 Section 37L does not empower the Board to assume the outcome of a substitute consent application, nor to treat unauthorised development as if it were lawful for the purposes of baseline conditions, cumulative assessment, or project description. To do so would unlawfully fragment the project and would be contrary to settled principles under the EIA Directive and Article 6(3) of the Habitats Directive, which require assessment of the entire project and its effects before consent is granted.

- 3.9 In addition, where the environmental assessments underpinning the substitute consent application have been shown to contain material lacunae, including missing surveys, incomplete cumulative assessment, or unresolved scientific uncertainty those deficiencies necessarily “overtake” any parallel application that relies on the same project description, same baseline conditions, or same receiving environment. The competent authority cannot lawfully proceed on the basis of assessments that are themselves under challenge or demonstrably incomplete.

#### **4. Legal issues arising in respect of this development**

- 4.1 The development consent that this substitute consent is concerned with and that is linked to this consent by virtue of being the parent consent to this, is Galway County Council reference 17/967 granted by the Council on the 2<sup>nd</sup> of April 2018. According to the applicant this consent ceased on the 11<sup>th</sup> of July 2023 after the Section 251 days and SI 165 of 2020 are taken into account and added to the 1<sup>st</sup> of April 2023.

- 4.2 A central legal error in the applicant’s position is the assertion that only works carried out after 11 January 2023 are unauthorised. That proposition has no basis in Irish planning law. Where a development authorised by a planning permission is not completed within the statutory duration of that permission, and no extension of duration is lawfully obtained under section 42 of the Planning and Development Act 2000, the permission ceases to have effect in its entirety. Once the permission has expired, there is no longer any subsisting consent capable of authorising any part of the development, whether constructed before expiry or not.

- 4.3 Expiry of permission and legal status of the development. Section 40(1) of the Planning and Development Act 2000 provides;

*“Subject to subsection (3), a permission granted under this Act shall, on the expiration of the appropriate period, cease to have effect (but without prejudice to the validity of anything done pursuant thereto prior to the expiration of that period).”*

- 4.4 The legal effect of section 40 is that, where a development is not completed within the lifetime of the permission and no lawful extension is obtained, the permission ceases to exist as a legal authorisation. The development as it stands thereafter has no subsisting consent underpinning it.

- 4.5 The Act does not recognise a concept of partial permission survival whereby development completed before expiry remains authorised indefinitely while incomplete elements are treated as severable. The planning permission is a single, indivisible legal instrument authorising a single project as assessed. Once it lapses without completion, the entire development stands without planning permission. This legal protection is to prevent say, a developer building profitable sections of a development while leaving social/ infrastructural sections of development unbuilt such as childcare facilities, sustainable drainage systems etc.

- 4.6 The parent application attempts to split the project temporally, treating works up to 10 July 2023 as authorised and those thereafter as unauthorised. That approach has no basis in section 40 and is incompatible with the structure of the Act, which regulates permissions as whole instruments, not as divisible consents.
- 4.7 Inability to conduct lawful EIA and AA on a partial project is an issue for this application which is subservient to the parent application. Environmental Impact Assessment and Appropriate Assessment are project-based and cumulative exercises. They require assessment of the entire development as it exists and is proposed, based on plans, drawings and reports that are indivisible from each other in the parent application and therefore from this application.
- 4.8 By excluding the works carried out prior to 11 July 2023 from the substitute consent application, the applicant deprives the Commission of jurisdiction to conduct a lawful EIA and AA of the development as a whole, a factual issue that extends to this 37L application. The environmental baseline has been altered irreversibly by those works, yet they are excluded from the scope of assessment in the parent application and therefore in this application and the cumulative impact on sensitive receptors both environmental and public health.
- 4.9 This creates an inherent legal defect: the Commission cannot reach the “complete, precise and definitive findings (without lacunae) and conclusions” required by EU law where the development subject to assessment is salami sliced and does not accurately reflect the original baseline and all unauthorised works and proposed works<sup>3</sup>.
- 4.10 Exceptional Circumstances.** Failure to meet the exceptional circumstances test is another legal deficit of this application. The applicant is a Department of State with access to legal, planning, and environmental expertise. It sought and was refused an extension under section 42. It commenced works notwithstanding the absence of a valid extension and persisted in that course while relying on an extension decision that was challenged within limited statutory time frame and ultimately quashed. The developer now seeks to build on that deficient foundation by applying for amended and expanded works with this application (323895)
- 4.11 The applicant asserts in the Planning Statement for 323827 that the circumstances giving rise to the present application satisfy the “exceptional circumstances” requirement applicable to substitute consent. That assertion is not supported by the facts as presented, nor by the legal framework governing substitute consent. The circumstances relied upon by the applicant arise primarily from failures of sequencing, project management, and legal compliance that were entirely within the applicant’s control. Such circumstances, even if regrettable, do not meet the threshold of exceptionality contemplated by the planning code.

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<sup>3</sup> See: Section 4.3 Changes and extensions, Cumulation with other projects and Salami-Slicing at <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52003DC0334>

- 4.12 The Planning Statement in 323827 places significant emphasis on the strategic importance of the Ros an Mhíl harbour, the public interest in fisheries infrastructure, and the advanced stage of construction at the time the planning consent expired. It should be noted that when the applicant sought a decision from An Comisiún Pleanála<sup>4</sup> as to whether the development was strategic in nature, the Commission decided it was not, agreeing with the inspector who found that “While the additional economic activity would clearly be significant at a local level I do not consider that it can clearly be stated that the economic and social impacts arising would be significant in a regional or national or national context.” However in relation to , the importance of a project, its public utility, or the financial and logistical consequences of delay are not, of themselves, exceptional circumstances for the purposes of substitute consent. The substitute consent regime was not designed to operate as a safety net for developments considered desirable or urgent, but as a narrowly circumscribed mechanism to address specific failures to carry out environmental assessment where EU law so requires. To treat public importance or economic consequence as determinative would be to convert an exceptional regime into a discretionary policy balancing exercise, which the legislation does not in WIDs opinion permit.
- 4.13 The planning statement for 323895 also makes a nod to the strategic relevance of the 37L application but does not as explicitly imply it is in itself strategic. If the development is not strategic should substitute consent on the parent application be allowed for a local development particularly when no exceptional circumstances exist to give ACP jurisdiction to grant such consent. Although framed carefully, the Planning Statement in 323895 proceeds on the assumption that substitute consent will be granted, and that the development can therefore be treated as capable of completion. Section 37L does not authorise the Board to assume the success of a substitute consent application, nor to treat unauthorised development as lawful for baseline, cumulative or project-definition purposes.
- 4.14 In the parent application the applicant further relies on the proposition that it acted in good faith and on the basis of a reasonable belief that it was entitled to proceed with the development. That position is difficult to reconcile with the documented planning history. The applicant sought an extension of duration in 2022 and was expressly refused on the basis that the statutory criteria were not met. Notwithstanding that refusal, works were subsequently commenced in early 2023 in advance of the expiry of the original permission and continued in reliance on a further extension decision that was ultimately quashed by order of the High Court. The Judicial review of 23/218 decision (a process to which WID had made a submission and highlighted serious environmental and legal lacunae) was lodged in the High Court on the 4<sup>th</sup> of September 2023 with Ex Parte leave granted on the 27<sup>th</sup> October 2023. In those circumstances, the legal risk attaching to the development and indeed continuing the development, despite legal proceedings, for nearly eight further months was neither unforeseeable nor beyond the applicant’s knowledge. (See appendix 4.1 of Attachment 1) satellite images of the progression

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<sup>4</sup> <https://www.pleanala.ie/en-ie/case/pc0232>

of the development.)

- 4.15 In both 323827 and 323895 this difficulty is compounded by the identity of the applicant. The Department of Agriculture, Food and the Marine is a central government department with access to legal, planning and environmental expertise. As an emanation of the State, it is charged with upholding and exemplifying compliance with domestic and EU law. Errors arising from misinterpretation of statutory provisions, failure to secure valid permissions carry out a lawful AA screening or reliance on legally vulnerable decisions cannot be equated with the type of exceptional or unforeseen circumstances that might, in limited cases, justify recourse to substitute consent. On the contrary, such circumstances point to ordinary administrative failure rather than legal exceptionality, these circumstances bleed into this application from the parent application and cannot be considered separate to 323895.
- 4.16 The Planning Statement in 323827 also seeks to characterise the present situation as an anomalous or unintended outcome of a complex regulatory environment. That characterisation is not borne out by the record. The statutory framework governing planning permissions, extensions of duration, Appropriate Assessment and Environmental Impact Assessment is well established and was fully engaged by the applicant's own actions, including the refusal of the section 42 application and the subsequent acknowledgment that Appropriate Assessment was required. The lapse of the original permission, and the legal consequences flowing from that lapse, were the predictable operation of the planning code rather than an external or extraordinary event.
- 4.17 Accepting the applicant's interpretation of exceptionality would carry broader and problematic implications. It would mean that a State authority, having failed to comply with clear statutory requirements and having allowed a permission to lapse, could nevertheless invoke substitute consent to regularise only those elements of a development it chooses to identify, on the basis of project importance and expended costs. That approach would not only undermine the exceptional nature of the substitute consent regime, but would risk unequal treatment between State and non-State developers, incentivise non-compliance (floodgates principal), and erode the preventive purpose of EU environmental law.
- 4.18 For these reasons, if the applicant has not demonstrated that the circumstances relied upon in the Planning Statement and application in 323827 satisfy the exceptional circumstances test applicable to substitute consent, then the parent application taints this application and carry's through the infirmity to it. The difficulties encountered were foreseeable, avoidable, and arose from matters within the applicant's control. They therefore fall outside the narrow category of situations for which substitute consent is lawfully available, and if the parent application cannot meet the statutory threshold required for its consideration or grant, then this application is invalidated before it gets out of the gate.

- 4.19 Furthermore in those circumstances, it cannot plausibly be argued that the applicant “could not reasonably have known” that the substantive development required valid consent and environmental assessment. Nor can administrative error, sequencing failure, or project management decisions by a State authority amount to “exceptional circumstances” within the meaning of section 177K. It must be noted and taken into account that The Department of Agriculture, Food and the Marine is itself a ‘competent authority’ with responsibility for carrying out environmental Impact assessments and Appropriate Assessment, for example in its ‘Aquaculture & Foreshore Management Division’ and cannot reasonably be expected to claim it did not know the law as it is required absolutely to know the law where the Habitats Directive, Birds Directive, Water Framework Directive and EIA Directive is concerned. In fact as recently as August 2025 the Department carried out an Appropriate Assessment for a foreshore licence in Ros An Mhil for a project that was not in fact, cumulatively assessed in this application (see appendix 4.2 of Attachment 2.1) To accept such circumstances as exceptional would invert the purpose of Part XA and reward non-compliance by the very bodies charged with upholding the law.
- 4.20 Article 4(3) of the Treaty on European Union provides;
- “Pursuant to the principle of sincere cooperation, the Union and the Member States shall, in full mutual respect, assist each other in carrying out tasks which flow from the Treaties. The Member States shall take any appropriate measure, general or particular, to ensure fulfillment of the obligations arising out of the Treaties or resulting from the acts of the institutions of the Union.”*
- 4.21 As an emanation of the State, the applicant is under a heightened obligation to exemplify compliance with EU environmental law, not to test its limits. Likewise, An Coimisiún Pleanála, as the competent authority, is obliged to ensure that domestic procedural mechanisms are not applied in a manner that undermines the effectiveness of EU law.
- 4.22 Permitting a State authority to rely on substitute consent to regularise a partially completed, environmentally sensitive development, where the lapse of permission arose from failures entirely within the control of that authority, would create a structural incentive for non-compliance and risk unequal treatment of non-State developers. Such an outcome raises serious concerns not only under planning and environmental law, but also under EU principles of equality, effectiveness, and potentially State aid if leniency is afforded uniquely to State actors.
- 4.23 For the reasons set out above and in the previous WID submission to 323827, the application for substitute consent is legally defective and therefore this application which is built upon it is legally defective. The lapse of the original permission rendered the entire development unauthorised as a matter of law. The attempt to confine substitute consent to a subset of the

works unlawfully fragments a single project and prevents the Commission from carrying out a lawful EIA and AA on the parent permission and by extension a lawful EIA and AA on this application. The applicant has failed to demonstrate exceptional circumstances, and its status as a Department of State aggravates rather than mitigates that failure. Accordingly, the Commission has no lawful jurisdiction to entertain either applications as applied for.

**5. Conflicts and deficiencies in the submitted EIS/rEIAR/ AA Screening and rNIS.**

- 5.1 Section 5 of the WID submission to 323827 (attachment 1) covers the issues in the parent permission and the Commission must integrate those issue into any cumulative assessment with this application. However it is near impossible for WID to effectively and lawfully make detailed observation on the subservient application 323895 when the parent application is so materially deficient. With the main issue being the unlawful baseline that is identified in this application not identifying the actual reality of the unauthorised development and the environmental baseline that existed before any works were undertaken under any of the planning applications identified in section 2.
- 5.2 The Environmental Impact Assessment Report submitted with application 323895 fails to comply with Directive 2011/92/EU, as amended by Directive 2014/52/EU, and the corresponding Irish transposing measures. Article 2 of the Directive requires that projects likely to have significant effects on the environment be subject to EIA before development consent is given. Article 3 requires a comprehensive assessment of effects on biodiversity, water, land, human health, and the interaction between these factors.
- 5.3 As identified at 5.1 the EIAR (and NIS) relies upon a baseline environment that has been materially altered by unauthorised works, including extensive land reclamation, blasting, dredging, and placement of rock armour. This approach is unlawful. An EIA cannot lawfully treat the environmental consequences of unauthorised development as an acceptable baseline against which further impacts are assessed. To do so would reward non-compliance and defeat the preventative purpose of the Directive and the application of the precautionary principle.
- 5.4 Article 5 and Annex IV of the Directive require that the EIAR contain complete, precise and scientifically sound information. The EIAR repeatedly acknowledges difficulties encountered, gaps in data, and reliance on qualitative professional judgment where quantitative information is absent, including in relation to marine sediments and water quality. Under EU law, such uncertainty cannot be resolved in favour of development. Where information is incomplete or imprecise, the competent authority is precluded from granting consent.
- 5.5 In WID's opinion the treatment of dredging and seabed disturbance is particularly deficient. Chapter 8 of the EIAR and Appendix 8A identify the presence of contaminated sediments, including PCBs, PAHs and heavy metals. However, there is no worst-case assessment of contaminant mobilisation, no robust sediment plume dispersion modelling, no assessment of

bioavailability or bioaccumulation, and no quantitative evaluation of toxicological effects on marine receptors. This omission alone constitutes a breach of the EIA Directive, Habitats Directive, Birds Directive, Water Framework Directive (including Priority Substances / Dangerous Substances Regime), Marine Strategy Framework Directive (MSFD) in relation to Good Environmental Status and the Urban Waste Water Treatment directive and the obligation for this application to cumulatively assess impacts with the raw sewage, effluent and industrial discharges to the waterbodies and or catchment that the harbour is located in. (see Section 6 below).

- 5.6 The SOCOTEC Laboratory analysis of sediments within the proposed dredging and excavation footprint confirms the presence of multiple toxic and persistent substances, including but not limited to polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and elevated concentrations of heavy metals. These substances are universally recognised as environmentally hazardous due to their persistence, toxicity and capacity to bioaccumulate. Their identification establishes, as a matter of fact, that the sediments are chemically contaminated and cannot be regarded as inert or benign material.
- 5.7 The significance of these findings is amplified by the nature of the proposed works. The development expressly involves dredging, excavation and, in places, blasting within the very sediments that have been chemically characterised. These activities will inevitably disturb sediment structure, alter redox conditions and resuspend fine particulates, thereby mobilising contaminants that are currently bound within the sediment matrix. Once mobilised, such substances do not remain localised. They enter the water column, are transported by tidal and current-driven processes, and become available for uptake by aquatic organisms well beyond the immediate works area.
- 5.8 Despite this, the Environmental Impact Assessment Report confines itself to the presentation of raw laboratory results, primarily within Chapter 8 and Appendix 8A, without undertaking any meaningful interpretation of what those results signify. The EIAR does not assess whether the concentrations identified are environmentally harmful when sediments are disturbed, does not compare the results against Environmental Quality Standards or recognised sediment quality benchmarks, and does not evaluate contaminant bioavailability or toxicological significance. The data are presented, but their implications are not analysed. This omission is particularly stark given that sediment disturbance is not incidental, but a central component of the proposed development.
- 5.9 No assessment is carried out of contaminant mobilisation during dredging, no modelling of sediment plume chemistry or dispersion is provided, and no evaluation is undertaken of indirect discharges of hazardous substances to the marine environment. The EIAR therefore fails to assess a foreseeable and intrinsic effect of the project. In environmental law terms, this is not a matter of disagreement between experts or of mitigation design; it is a failure to assess an effect

that is both predictable and acknowledged by the applicant's own sampling program. Effectively they have done the sampling but stopped short of analysing the significance of what they found. The Board need independent expertise to be brought in to clearly identify how the applicant can comply with a legal EIA, AA and WFD assessment.

- 5.10 The Natura Impact Statement compounds these deficiencies further as the test and the regime for AA is more onerous than that for the EIA. The NIS does not meaningfully engage with the sediment chemistry data at all. It does not translate the laboratory findings into an assessment of impacts on qualifying interests or conservation objectives, does not examine contaminant uptake by benthic organisms or prey species in and out of water, and does not assess the potential for bioaccumulation and biomagnification in protected species such as harbour porpoise or in sensitive habitats such as seagrass beds and spawning grounds. The existence of toxic substances in the sediments is therefore effectively ignored for the purposes of Appropriate Assessment.
- 5.11 This absence of analysis has direct and unavoidable legal consequences. Article 6(3) of the Habitats Directive requires the competent authority to be satisfied, beyond reasonable scientific doubt, that a plan or project will not adversely affect the integrity of a European site. Where laboratory data establish the presence of toxic substances, and where project works will mobilise those substances, the absence of assessment does not equate to absence of impact. On the contrary, it gives rise to scientific uncertainty. Under settled EU law, scientific uncertainty cannot be resolved in favour of development. Where uncertainty remains, consent must be refused.
- 5.12 The same defect arises under the Water Framework Directive. The dredging and disturbance of contaminated sediments constitute a foreseeable pathway for the release of priority and hazardous substances into surface waters. The application contains no deterioration assessment, no comparison with chemical status thresholds, and no evaluation of whether mobilisation of these substances would undermine water body status or designated uses. In the absence of such assessment, the competent authority cannot lawfully conclude that the project will comply with the non-deterioration obligation in Article 4 of the Directive.
- 5.13 The ultimate point is that this is not a case where data or findings are absent because contamination is unknown. The applicant's own laboratory analysis confirms the presence of toxic substances. What is absent is the assessment of what those data mean. In EU environmental law, a lack of interpretation, modelling and legal analysis is not a neutral gap; it is a failure of proof. The absence of assessment is itself the source of scientific doubt.
- 5.14 Accordingly, the documentation before the competent authority does not provide the complete, precise and definitive findings required to support a lawful Appropriate Assessment under Article 6(3) of the Habitats Directive or to demonstrate compliance with the non-deterioration

and chemical status obligations of the Water Framework Directive. In these circumstances, the competent authority is legally precluded from granting consent.

**6. Failure to cumulatively assess relevant plans, projects, programs.**

6.1 The rNIS and the earlier Appropriate Assessment Screening report prepared in 2022 from 323827 and the NIS in this application 323985 both fail to carry out a lawful cumulative assessment of relevant plans, projects and programmes capable of affecting the integrity of the Natura 2000 network. Article 6(3) of the Habitats Directive requires that likely significant effects be assessed not only in isolation but also in combination with other existing and proposed pressures. That obligation has not been met in this case.

6.2 Figure 6.1 below demonstrates that a substantial number of planning permissions exist within the harbour lands and on adjoining lands, all of which have the potential, individually and cumulatively, to impact the receiving environment and nearby European sites. Notwithstanding this, neither the rNIS/ NIS nor the earlier screening assessment identifies, catalogues or evaluates these consents in a systematic manner, nor do they assess how their effects may interact with the quay development.

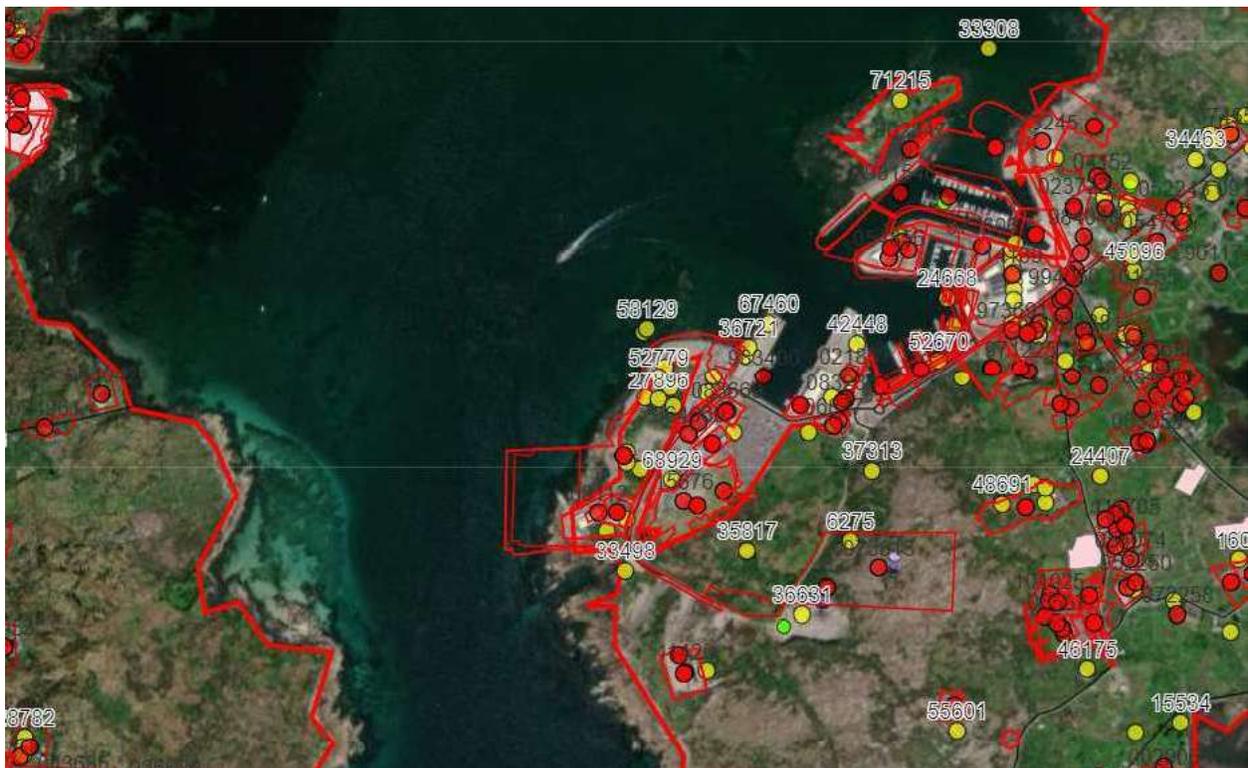


Figure 6.1. Planning developments that may require cumulative assessment.

6.3 Further deficiencies arise in respect of discharges to water. Figure 6.2, drawn from the EPA GIS

portal, identifies multiple Section 4 discharges and chemical monitoring points within and adjacent to the bay. These discharges represent existing and ongoing pressures on the receiving waters, yet they are not identified, described or assessed in either the rNIS or the rEIAR. Their omission precludes any meaningful assessment of in-combination effects on water quality and dependent habitats and species.

- 6.4 This may include W182/88 licenced to Uduras na Gaeltachta which includes sewage effluent and has been licenced since 1992. The original licence, monitoring data and AER should be submitted for this licence and for any other section 4 discharges that may impact water quality or the NATURA2000 network in a cumulative manner. Particularly in light of the fact that the associated planning under Section 37L (323895) papers to utilise this Section 4 discharge and operational waste water treatment plant to treat effluent from this development.

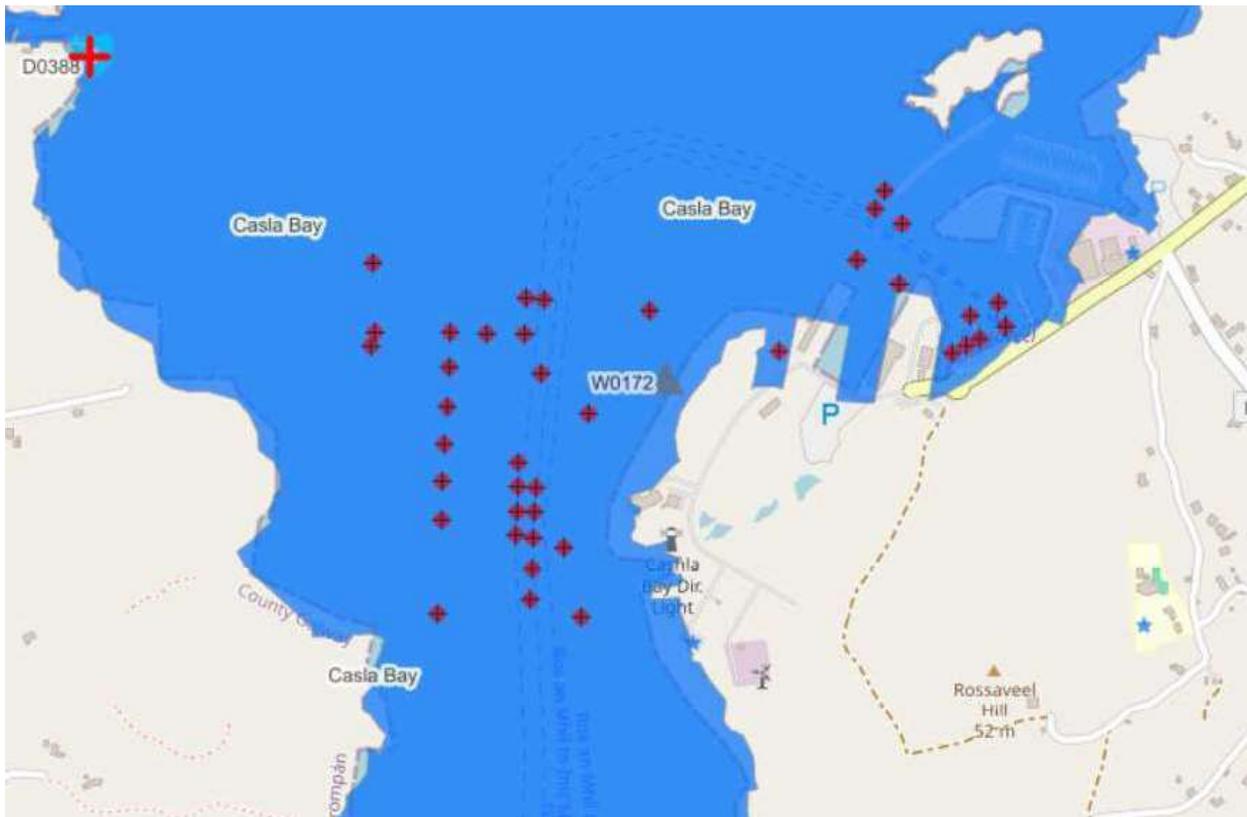


Figure 6.2. Section 4 Discharges and chemical monitoring points.

- 6.5 Figure 6.3, also derived from the EPA planning portal, indicates that much of the Ros an Mhíl area does not form part of a designated wastewater agglomeration. This strongly suggests the presence of numerous septic tank systems in close proximity to the bay and/or the potential for untreated wastewater discharges directly to coastal waters. Given that Ros an Mhíl functions as a major harbour and ferry hub, it is reasonable to expect that toilet and sanitary facilities are provided for workers, ferry passengers and visitors. The absence of any assessment of the nature, location and treatment of wastewater arising from these activities represents a

significant omission. The extent of all wastewater collection systems, septic tanks and direct discharges must be clearly identified and assessed in any application for substitute consent and in the accompanying rEIAR and rNIS and in the instant application EIAR and NIS for 323895.

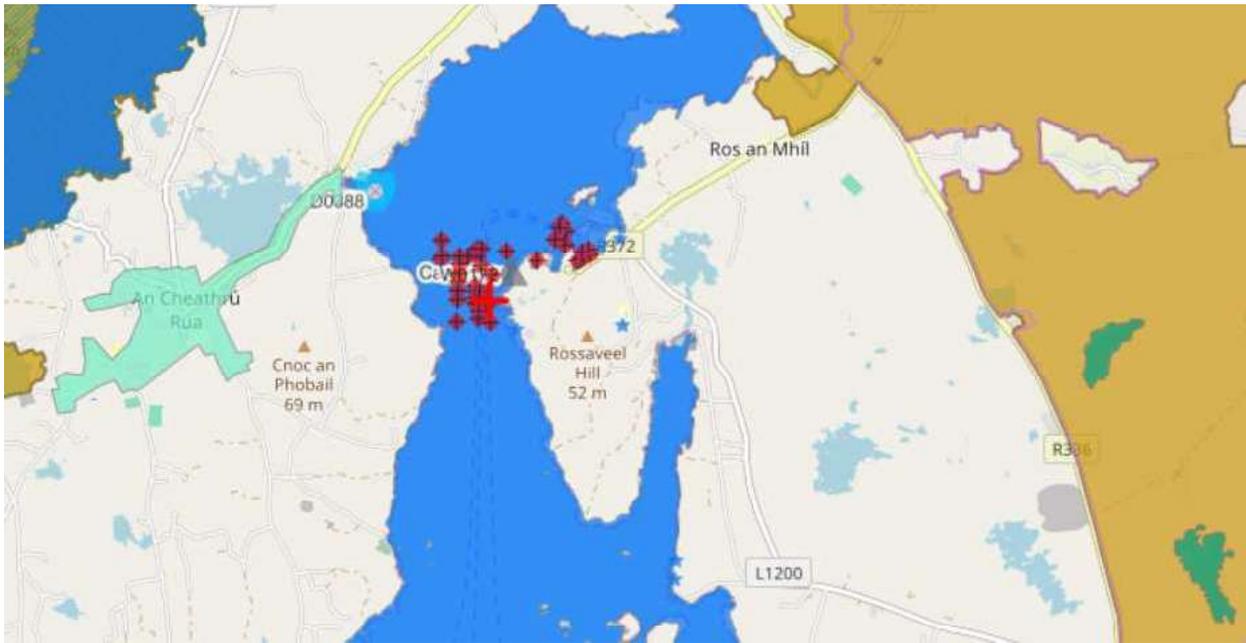


Figure 6.3. EPA GIS Mapping – Orange and light blue identifying Waste Water agglomerations.

6.6 The Carraroe agglomeration (D0388) light blue above, is subject to a Wastewater Discharge Authorisation permitting the discharge of untreated raw sewage to the receiving waters. Notwithstanding the existence of this discharge, Uisce Éireann has provided no information on the nature, volume, frequency or impacts of these discharges in its most recent Annual Environmental Report, as set out at [Appendix 6.1 of Attachment 1](#). The discharge of raw sewage from this agglomeration has been the subject of repeated infringement warnings and has already resulted in adverse findings against the State by the Court of Justice of the European Union.

6.7 In these circumstances, there is no lawful basis upon which the present development as applied for with proposed development could be authorised without a full and transparent assessment of the raw sewage discharges and their interaction with the quay development. Those discharges constitute a significant and ongoing pressure on the receiving waters and must be assessed cumulatively in the context of Environmental Impact Assessment, Appropriate Assessment under Article 6(3) of the Habitats Directive, and assessment under the Water Framework Directive. The complete failure to identify, quantify or assess these discharges in the application documentation for both files represents a serious and fatal lacuna. In the absence of such assessment, the competent authority cannot lawfully conclude that the unauthorised

development or proposed development will not give rise to adverse effects on protected habitats, species or water bodies.

- 6.8 Figures 6.4 and 6.5 identifies a quarry located within the harbour lands which appears to have been used as a source of hardcore material for the reclamation of coastal waters associated with the quay development. Mapping from the planning portal raises a serious question as to whether the lands from which this material was extracted are subject to a lawful planning permission for quarrying. The quarry appears to have been subject to an enforcement notice EN18/077. If the material used in the reclamation works was not lawfully obtained, this introduces a further layer of illegality and environmental risk. Given that the material has already been placed in the coastal environment, this issue requires urgent clarification and assessment, both from a planning compliance perspective and in terms of potential environmental effects.



Figure 6.4 – Quarry pit before works commenced.



Figure 6.5. Quarry pit after works commenced.

6.9 Taken together, these omissions demonstrate a systemic failure to identify and assess cumulative impacts on the Natura 2000 network and the receiving environment. Without a comprehensive and transparent evaluation of all relevant plans, projects, discharges and material sources, the competent authority cannot lawfully conclude that the development, either alone or in combination with other pressures, will not adversely affect the integrity of European sites.

## **7. Water Framework Directive assessment.**

7.1 Water Framework Directive Compliance and Stand Alone Assessment; The Ros an Mhíl Deep Water Quay development is located within and directly affects coastal waters and some tidal rivers to which Directive 2000/60/EC establishing a framework for Community action in the field of water policy (the Water Framework Directive) applies. The obligations imposed by that Directive are legally binding on both the applicant, and on An Coimisiún Pleanála as the competent authority. Those obligations apply independently of, and cumulatively with, the requirements of the Environmental Impact Assessment Directive and the Habitats Directive and must be complied with at the stage of authorisation of any project capable of affecting the status of a surface water body.

7.2 Article 4 of the Water Framework Directive sets out the Directive's core environmental objectives. Article 4(1)(a)(i) provides, that Member States shall "implement the necessary measures to prevent deterioration of the status of all bodies of surface water", while Article 4(1)

(a)(ii) further requires Member States to “protect, enhance and restore all bodies of surface water... with the aim of achieving good surface water status”. These obligations are preventive in nature and admit of derogation only under the tightly constrained regime set out in Article 4(7). They require the competent authority to be satisfied, in advance of consent, that a project will not cause deterioration in the status of the water body or compromise the achievement of environmental objectives.

- 7.3 The activities comprising the Ros an Mhíl Deep Water Quay development, including dredging, blasting, rock placement, reclamation of coastal waters and increased vessel movements, are inherently capable of affecting multiple quality elements relevant to Water Framework Directive status classification. These include hydromorphological conditions, sediment transport and deposition, turbidity and suspended solids, seabed integrity, and biological quality elements such as benthic invertebrate communities and fish populations. In addition, the operational use of the harbour introduces ongoing pressures associated with intensified vessel activity, including bilge water discharge, hull cleaning and maintenance residues, fuel handling, accidental spills, and diffuse pollution from port and FHC operations. Each of these pressures is relevant to the Directive’s non-deterioration obligation and must be assessed cumulatively.
- 7.4 Beyond project-specific impacts, the Water Framework Directive requires that deterioration risk be assessed in combination with all existing and authorised pressures affecting the same water body. In this regard, the application documentation fails to identify or assess a range of legally relevant discharges. These include Section 4 discharges to waters, Dumping at sea licences, wastewater discharge licences or authorisations, and discharges arising from areas not served by wastewater agglomerations, which strongly indicate reliance on septic tanks or other on-site wastewater treatment systems in close proximity to the bay. Leakage or malfunction of such systems is a recognised source of nutrient and microbial pollution and is directly relevant to the assessment of ecological and chemical status under the Directive.
- 7.5 The omission of these discharges from the assessment material in addition to the failure to assess toxic substances identified in the sediments as per Section 5 above, is particularly serious in the context of a functioning harbour and ferry hub. One would reasonably expect the presence of sanitary facilities for workers, ferry passengers and visitors, as well as service infrastructure associated with vessel berthing and maintenance. The failure to identify how wastewater arising from these activities is collected, treated or discharged prevents any meaningful assessment of cumulative nutrient loading, microbial contamination, or interactions with other pressures already affecting the receiving waters.
- 7.6 The Water Framework Directive does not permit the assessment of deterioration risk on a partial or segmented basis. The legally relevant question is whether the project, as a whole and in its factual and environmental reality, is liable to cause deterioration of the status of a water body or to jeopardise the achievement of environmental objectives. That assessment must take

into account the current condition of the water body at the time of decision-making, including alterations already caused by construction works and ongoing operational pressures.

- 7.7 In the present case, the applicant seeks to confine a purported few paragraphs on Water Framework Directive to works carried out after 11 July 2023, excluding from consideration substantial dredging, blasting and reclamation works undertaken prior to that date, as well as pre-existing and concurrent discharge pressures. This approach is incompatible with Article 4 of the Directive. Once physical works have altered hydromorphology, sediment regimes or seabed conditions, and once additional pollutant pathways have been introduced through construction and operation, those changes form part of the impact against an original baseline against which further deterioration on this secondary (shifting baseline) must be assessed. An assessment that excludes such alterations and pressures and has no modelling of the old and new hydrological regimes and or future regimes, cannot answer the legally required question of whether deterioration has occurred or will occur.
- 7.8 Furthermore, the Directive requires that impacts be assessed in combination with other pressures affecting the same water body. Cashla Bay and its receiving waters are subject to multiple existing and authorised pressures, including wastewater discharges, on-site wastewater treatment systems, harbour-related pollution sources, fisheries activity and vessel traffic. An assessment limited to a subset of works and which fails to identify and assess these pressures in combination artificially isolates impacts that are cumulative in nature and therefore fails to comply with the Directive.
- 7.9 Where deterioration cannot be excluded, a project may proceed only if the strict conditions in Article 4(7) are satisfied. That provision permits derogation from the non-deterioration obligation only where the reasons for the modification are of overriding public interest, no significantly better environmental options exist, and all practicable mitigation measures are taken. The present application does not purport to invoke Article 4(7), nor does it provide the information necessary to support such a derogation. In the absence of a lawful Article 4(7) assessment, the competent authority has no discretion to authorise a project that risks deterioration.
- 7.10 The obligation to ensure compliance with the Water Framework Directive rests squarely with An Coimisiún Pleanála as the decision-maker. It cannot be discharged by deferring assessment to future licensing, operational controls or monitoring regimes, nor by accepting a fragmented application that excludes works already carried out or omits existing discharge pressures that are integral to the project's impact on the water body.
- 7.11 In circumstances where the development has proceeded without a subsisting planning permission, without a lawful Appropriate Assessment, and without a coherent and comprehensive assessment of deterioration risk under the Water Framework Directive that

includes all relevant discharges and pollution pathways, in both this application and the parent application, the Commission cannot lawfully conclude that the environmental objectives in Article 4 have been met. The Water Framework Directive therefore constitutes an independent and additional legal barrier to the grant of consent in this case. Until the entire Ros an Mhíl Deep Water Quay development is assessed in its totality, on the basis of current environmental conditions and cumulative impacts, the Commission cannot lawfully authorise its retention, completion or operation.

## **8. Other Consents:**

- 8.1 A further matter requiring clarification concerns whether the development has been authorised by the appropriate foreshore licences and/or marine area consents, and whether such consents, if any, were obtained in the correct legal sequence relative to planning permission and environmental assessment. The Ros an Mhíl harbour area is subject to extensive and overlapping marine uses, and publicly available mapping indicates a dense proliferation of existing foreshore licences and marine consents within the wider bay. In such circumstances, careful coordination between the planning code and the foreshore and marine consenting regimes is essential to ensure legal certainty and environmental protection.
- 8.2 It is unclear from the application documentation whether all elements of the development, particularly dredging, reclamation, quay construction, placement of materials below the high-water mark, and any associated temporary works, have been authorised under the correct statutory regime. Historically, such works required foreshore licences or leases under the Foreshore Acts, while more recent developments may fall within the scope of the Marine Area Planning Act and require a Marine Area Consent. The application does not clearly identify which regime applies to each component of the works, nor does it set out whether the necessary consents have been granted, are pending, or were relied upon prior to being lawfully in place.
- 8.3 This lack of clarity raises a material concern regarding sequencing. As a matter of law and principle, environmental assessment must inform consent, not follow it. Where foreshore licences or marine consents or dumping at sea licences are required, those consents must be integrated into the overall authorisation framework in a manner that ensures Environmental Impact Assessment, Appropriate Assessment, and Water Framework Directive obligations are satisfied before irreversible works are undertaken. If works proceeded in advance of the requisite foreshore or marine consent, or if such consents were sought or granted on the basis of an expired or legally vulnerable planning permission, this would raise serious questions as to the lawfulness of the development process as a whole.
- 8.4 The issue is particularly acute given the potential for cumulative and in-combination effects arising from multiple foreshore licences and marine consents operating within the same receiving waters. Without a clear account of all relevant foreshore licences and marine area consents, including their status, conditions, and spatial extent, it is not possible for the

competent authority to assess cumulative impacts or to determine whether the present development has been authorised consistently with other marine uses in the area.

8.5 Accordingly, clarification is sought as to whether all required foreshore licences and/or marine area consents have been secured for the development, the dates on which any such consents were granted, the statutory basis upon which they were issued, and how they interact with the planning permissions and substitute consent now sought. In the absence of this information, there is a real risk that the development has proceeded without the full suite of legally required marine consents, or in an incorrect sequence, which would constitute a further and independent obstacle to the lawful authorisation of the project.

## **9. Actual use for Ros a'Mhil.**

9.1 The application before the Commission proceeds on the basis that the development is a fisheries-led infrastructure project, justified economically by increased landings, processing activity and associated marine services. However, the applicant's own published documentation demonstrates that the long-term economic viability of the Rossaveel Fishery Harbour Centre as a deep-water port is highly contingent on non-fisheries uses, in particular offshore renewable energy activities, notwithstanding that such uses are entirely absent from the description of development, the revised EIAR and the revised Natura Impact Statement. In fact this very question has also been raised by An Taisce in their submission to this application no 323895.<sup>5</sup>

9.2 The Cost-Benefit Analysis (Appendix 9.1 of Attachment 1) prepared for the revised deep-water berth (not submitted with this application) expressly identifies offshore renewable energy as a core driver of future economic viability, stating that Rossaveel is "of great strategic importance in servicing both floating and fixed offshore windfarms" and that these developments alone would justify the provision of the deep-water berth.

9.3 The same document makes clear that the financial performance of the harbour, assessed strictly on a fisheries basis, is weak, with the financial appraisal yielding a strongly negative Net Present Value and Benefit-Cost ratio well below unity, and that the positive economic case relies on wider, indirect and future activities rather than existing fisheries demand.

9.4 This reliance on future diversification is further confirmed by the fact that Irish fishing quotas and landings volumes have, since the original permission issued, been substantially revised downwards, a trend acknowledged within the fisheries business planning material itself (see appendix 9.2), which highlights decommissioning, quota reductions and structural contraction within the sector. This plan does not reflect further reductions and constraints in quotas for Irish Fishers in recent EU CAP allocations.

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<sup>5</sup> <https://www.pleanala.ie/publicaccess/Responses/323895/An%20Taisce%20%2020-01-26.pdf?r=410257994399>

- 9.5 In such circumstances, the premise that a major capital investment of this scale can be justified on fisheries demand alone is not supported by the evidence now available and appears increasingly unrealistic. Despite this, the application does not include offshore renewable energy activities as part of the project description, nor does it assess the environmental implications of using the quay, dredged areas and hinterland for offshore renewables assembly, servicing, logistics or intensified vessel movements. There is no assessment in the remedial EIAR or remedial NIS of the cumulative, secondary or induced impacts that would arise from such intensification of use, including increased dredging maintenance, vessel traffic, noise, lighting, pollution risk, or disturbance to qualifying interests of nearby European sites. The omission is particularly significant given that offshore renewable use is repeatedly identified in the applicant's own published economic material (not submitted with this application) as a central justification for the investment.
- 9.6 This disconnect gives rise to a planning and environmental law concern. Either offshore renewable energy operations form part of the project for which consent is now sought, in which case they must be explicitly included in the application and assessed under the EIA and Habitats Directives, or they do not form part of the project, in which case the economic case advanced for the development is materially incomplete and misleading. It appears misleading for the Department to rely on future, unassessed uses to justify the project economically while avoiding assessment of their environmental effects. As there is already very serious breaches of EU law in relation to this development, the Department may have jeopardised future EU funding for this development and or have breached obligation in expenditure of EU funds if already applied.
- 9.7 In those circumstances, and without prejudice to the primary submission that the application is incapable of lawful determination due to jurisdictional defects and failure to assess the entirety of the development, it is submitted in the alternative that any grant of consent would require a strict and explicit condition prohibiting the use of the deep-water berth and associated infrastructure for offshore renewable energy or related industrial marine operations. Such a condition would be necessary to ensure that the development remains within the scope of the project assessed in the revised EIAR and revised NIS, and to prevent subsequent intensification or change of use that has not been subject to appropriate environmental assessment.
- 9.8 Absent either a revised application that transparently incorporates offshore renewable energy uses into the project description, or a condition expressly excluding such uses, the Commission cannot be satisfied that it has before it a complete, coherent and environmentally assessable project. Granting consent in these circumstances would risk facilitating a form of project-splitting, whereby the economic justification relies on unassessed future activities, contrary to the requirements of EU environmental law and the principles of legal certainty and informed decision-making.

## 10. Conclusion

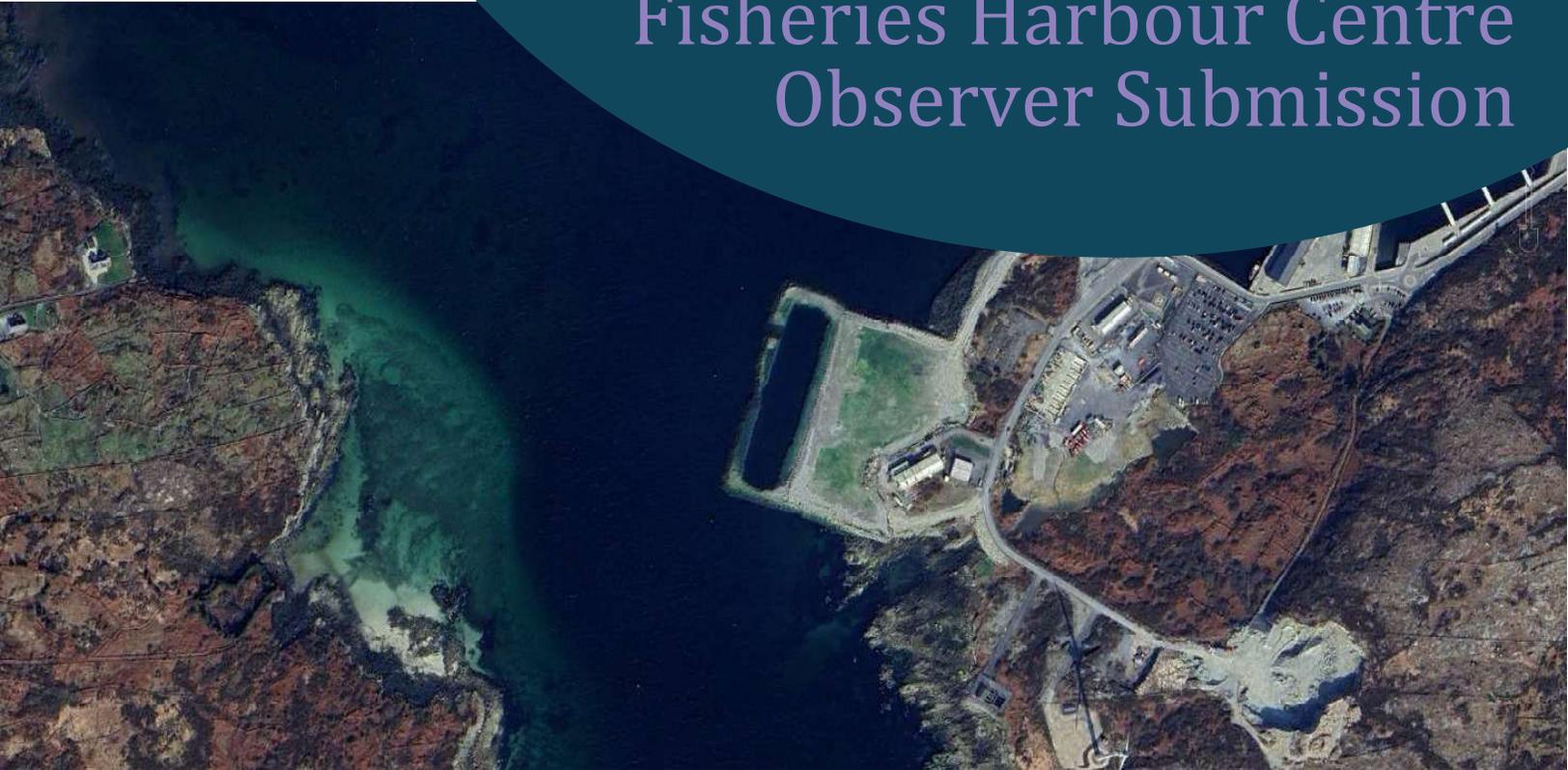
- 10.1 For the reasons set out in this submission, it is respectfully submitted that the application is incapable of lawful determination and must be refused or otherwise rejected *in limine*. The development in question was not completed within the statutory duration of the original permission, no lawful extension under section 42 of the Planning and Development Act 2000 (as amended) was validly secured, and no continuous or subsisting planning permission existed at the time the impugned works were carried out. In those circumstances, the development cannot be artificially segmented so as to treat only post-expiry works as unauthorised, and the statutory preconditions for invoking the substitute consent regime under Part XA are not met in the parent application and so cannot be met in this expansion/ amendment of that application. Accordingly, the Board lacks jurisdiction to process or determine the application, and to do so would amount to an unlawful circumvention of the ordinary planning code and of the requirements of EU environmental law.
- 10.2 Without prejudice to that primary position, and in the alternative only, it is submitted that if the Commission were to consider that it has jurisdiction to proceed under Part XA in the parent application, it cannot lawfully do so on the basis of the information currently before it and therefore per this application. The documentation lodged in both applications is materially deficient and does not provide a complete, precise or scientifically robust basis upon which the Commission could carry out its obligations under the Environmental Impact Assessment Directive, Article 6 of the Habitats Directive, or the Water Framework Directive. The revised EIAR and revised NIS and EIAR and NIS fail to describe the project in a complete and coherent manner, omit assessment of foreseeable intensification and alternative uses that underpin the economic rationale of the development, and do not adequately address cumulative, in-combination or long-term impacts on European sites, protected species or water bodies.
- 10.3 In those circumstances, and in order to avoid a manifest breach of EU law, it is submitted that the Commission would be required, at a minimum, to seek substantial further information before any consideration of substitute consent application and by knock on effect this application, could lawfully occur. Such information would need to include, but not be limited to, a complete and accurate project description; a revised Environmental Impact Assessment that assesses all likely significant effects arising from the development as a whole; a revised Natura Impact Statement capable of supporting a lawful Appropriate Assessment in accordance with Article 6(3) of the Habitats Directive; and a full assessment of compliance with the objectives and non-deterioration obligations of the Water Framework Directive and the equivalent for the 37L application once the parent documents had been revised to be in compliance. Absent such information, the Commission cannot reach reasoned, evidence-based conclusions capable of withstanding legal scrutiny.

- 10.4 In summary, the only lawful course open to the Commission is to refuse or invalidate the applications in the first instance. Alternatively, and strictly without prejudice to that position, the Commission must require the submission of substantial further information sufficient to enable a lawful, transparent and EU-compliant assessment process. Any attempt to proceed otherwise would undermine the integrity of the planning system, erode public confidence in environmental governance, and expose the decision to inevitable legal challenge. WID will make detailed submissions on the rEIAR, rNIS and rWFD from the parent application 323827 and the EIAR, NIS and FWD assessment once amended for the 323895 application, once the appropriate information, surveys, data and cumulative impacts have been updated so as to be scientifically precise and robust and without lacunae.
- 10.5 The Commission must adhere to their statutory obligation in terms of the nature of the test for Article 6(3). The obligation imposed by that provision is not reactive but preventive. It does not require proof of harm; it requires certainty of the absence of harm before consent may lawfully be granted. As the Court of Justice held in *Waddenzee* (C-127/02, paras 59–61), authorisation may be given only where no reasonable scientific doubt remains as to the absence of adverse effects on site integrity

Yours Sincerely  
Elizabeth Davidson  
Secretary Wild Ireland Defence CLG.

# An Coimisiún Pleanála Substitute Consent 323827

## Ros a' Mhíl Fisheries Harbour Centre Observer Submission



Satellite Image by Google Earth 18<sup>th</sup> March 2025

**Planning submission submitted by:**

**Wild Ireland Defence CLG  
5 Eaglewood House  
Rochestown Avenue  
Dun Laoghaire  
Co. Dublin  
A96 X213**

**Date of Submission: 5<sup>th</sup> January 2026**

# Submission

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## 1. Introduction

- 1.1 Wild Ireland Defence CLG is an organisation dedicated to education, advocacy and legal action in the protection, conservation, preservation and defence of the natural environment, and of the species and habitats that depend upon it. A core purpose of the organisation is to uphold, promote and seek compliance with the domestic and European Union legal frameworks governing environmental protection.
- 1.2 Wild Ireland Defence CLG makes this submission in its capacity as an observer in order to ensure that the application for substitute consent is examined and determined in strict accordance with applicable European Union and national environmental, planning and development law, and that the statutory protections afforded to the environment and protected species are fully respected and enforced.
- 1.3 Wild Ireland Defence CLG has commissioned Sabrina Joyce-Kemper, Planning and Environmental Consultant, to review the application and to provide an expert assessment of the matters arising. Ms Joyce-Kemper has examined the material as submitted and has prepared the brief summary set out below, which Wild Ireland Defence CLG adopts and endorses in full. Ms Joyce-Kemper holds an Advanced Diploma in Planning and Environmental Law from the Honourable Society of King's Inns.
- 1.4 This assessment is necessarily limited in scope. Wild Ireland Defence CLG's position is that the application, as currently framed, fails to address the entirety of the development and does not encompass the full extent of the unauthorised development at Ros an Mhíl Fisheries Harbour Centre (FHC). In those circumstances, a comprehensive assessment is not possible, and Wild Ireland Defence CLG considers that a substantially revised and/or new application is required, incorporating the full unauthorised development, before the statutory decision-maker can lawfully carry out a complete and robust assessment.
- 1.5 This WID observation is relating to an application for substitute consent reference 323827 which is described on the An Coimisiún Pleanála case page / portal as follows<sup>1</sup>;
- Application for Substitute Consent for Deep Water Quay Development under section 177E of the Planning and Development Act 2000 (as amended). The application is accompanied by an EIA and NIS.*
- 1.6 This submission is made by Wild Ireland Defence CLG in response to significant omissions and deficiencies in the application documentation relating to impacts on protected species and habitats under the EIA Directive, Habitats Directive and Birds Directive, and on surface waters and coastal waters protected under the Water Framework Directive. The submission seeks to request invalidation and/ or refusal of the application in the first instance, or without prejudice

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<sup>1</sup> <https://www.pleanala.ie/en-ie/case/323827>

to that argument, in the second instance to request further information and clarification in respect of the extent of the development concerned and the corresponding remedial Natura Impact Statement (rNIS) and the remedial Environmental Impact Assessment Report (rEIAR), as such information is necessary to enable the Board to lawfully and robustly carry out its obligations under Article 6 of the Habitats Directive and the Environmental Impact Assessment Directive.

- 1.7 As currently presented, the application with its arbitrary limitation of the development concerned, contains material omissions which prevent the carrying out of a complete, precise and scientifically robust remedial Appropriate Assessment and remedial Environmental Impact Assessment. The deficiencies identified are such that the Commission cannot, on the basis of the information provided, reach definitive findings or conclusions of no significant effect on Natura 2000 sites, as required by EU law. In several instances, there is no current scientific or evidential material before the Board capable of substantiating the screening conclusions reached by the applicant in the Appropriate Assessment Screening report or relied upon in the Natura Impact Statement. Accordingly, the documentation on file is insufficient to support the determinations sought, and further information is required before any lawful assessment or decision can be made.
- 1.8 The final date for submission (within 8 weeks from date of application fell on the 25<sup>th</sup> of December 2025, therefore the submission date for this observation has the benefit of additional days per Section 251 (holiday rule) and weekend rule as per the Commissions 'Guide to Christmas opening booklet'.<sup>2</sup>

## **2. Direct planning history relevant to this application.**

- 2.1 Planning permission for the Ros an Mhíl Deep Water Quay was granted by Galway County Council on 2 April 2018 under planning reference 17/967. That permission authorised a defined and integrated project comprising a new quay wall, land reclamation, dredging works, and associated marine construction, all as assessed in the Environmental Impact Assessment (but not Appropriate Assessment) process undertaken at that time.
- 2.2 In April 2022, the Department of Agriculture, Food and the Marine, as applicant, sought an extension of duration under section 42 of the Planning and Development Act 2000 (as amended) by way of application reference 22/460. That application was refused on the lawful basis that no development had been substantially carried out, a statutory precondition for the exercise of the section 42 power.
- 2.3 Notwithstanding the absence of any valid extension, a business case was approved and a construction contract was awarded in or about October 2022. Physical works commenced on site in January 2023, while the original permission remained extant but approaching expiry.

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<sup>2</sup> <https://www.pleanala.ie/getmedia/2399a5ab-649c-4484-8713-991d9ec355d0/Guide-to-Christmas-Opening-Booklet-2025-2026.pdf?ext=.pdf>

- 2.4 On 26 May 2023, an application purporting to seek an extension of permission was lodged under reference 23/60548. That application was deemed invalid but the applicant was not advised as such until the 12<sup>th</sup> of July 2023. On or about 29 May 2023, a further (concurrent?) application was made under reference 23/218, seeking to extend the duration of the original permission. This extension of permission was granted on 11<sup>th</sup> July 2023. That decision was subsequently challenged by way of judicial review and was quashed by an order of certiorari perfected on 11 November 2024 in proceedings bearing record number 2023/1007JR which were initiated in September 2023. As a matter of law, that decision must be treated as having never had legal effect.
- 2.5 The original permission 17/967 expiration date was 1<sup>st</sup> of April 2023 taking into account the applicants claim of an additional 101 days, the claimed expiration date is 11<sup>th</sup> July 2023 as was the impugned planning decision date for extension 23/218, which was subsequently quashed. However the permission as granted under 17/967 was not completed in accordance with the consent on either the 1<sup>st</sup> of April 2023 or 11<sup>th</sup> of July 2023. Development works continued thereafter until May 2024.
- 2.6 The present application seeks substitute consent for works carried out between 11 July 2023 and 20 May 2024 only, and is accompanied by a separate application under section 37L (323895) seeking permission to complete the remainder of the project.

### **3. Current legal landscape governing substitute consent**

- 3.1 Part XA of the Planning and Development Act 2000 was introduced to address Ireland's failure to comply with the Environmental Impact Assessment Directive in respect of unauthorised development. It constitutes a strictly limited and exceptional remedial regime, not a parallel or alternative planning system.
- 3.2 Section 177E(1) provides that an application for substitute consent may be made only in respect of development carried out without the required environmental assessment. Section 177K strictly governs the Board's jurisdiction to grant such consent.

Section 177K(1) provides:

*"The Board may grant substitute consent in respect of a development where;*

*(a) the Board is satisfied that exceptional circumstances exist which justify the grant of substitute consent, and*

*(b) the Board has carried out an environmental impact assessment or appropriate assessment, or both, in respect of the development."*

- 3.3 Section 177K(1J) further restricts what may constitute exceptional circumstances, including, at subsection (b), circumstances where the applicant "could not reasonably have known" that the

development required assessment.

- 3.4 This regime transposes the requirements of Directive 2011/92/EU (as amended) as interpreted by the Court of Justice of the European Union, which has consistently held that retrospective consent may be permitted only as an exception, and must not have the effect of circumventing the preventive purpose of environmental assessment.

#### **4. Legal issues arising in respect of this development**

- 4.1 The impugned development consent that this substitute consent is concerned with and linked to, is Galway County Council reference 17/967 granted by the Council on the 2<sup>nd</sup> of April 2018. According to the applicant this consent ceased on the 11<sup>th</sup> of July 2023 after the Section 251 days and SI 165 of 2020 are taken into account and added to the 1<sup>st</sup> of April 2023.

- 4.2 A central legal error in the applicant's position is the assertion that only works carried out after 11 January 2023 are unauthorised. That proposition has no basis in Irish planning law. Where a development authorised by a planning permission is not completed within the statutory duration of that permission, and no extension of duration is lawfully obtained under section 42 of the Planning and Development Act 2000, the permission ceases to have effect in its entirety. Once the permission has expired, there is no longer any subsisting consent capable of authorising any part of the development, whether constructed before expiry or not.

- 4.3 Expiry of permission and legal status of the development. Section 40(1) of the Planning and Development Act 2000 provides;

*“Subject to subsection (3), a permission granted under this Act shall, on the expiration of the appropriate period, cease to have effect (but without prejudice to the validity of anything done pursuant thereto prior to the expiration of that period).”*

- 4.4 The legal effect of section 40 is that, where a development is not completed within the lifetime of the permission and no lawful extension is obtained, the permission ceases to exist as a legal authorisation. The development as it stands thereafter has no subsisting consent underpinning it.

- 4.5 The Act does not recognise a concept of partial permission survival whereby development completed before expiry remains authorised indefinitely while incomplete elements are treated as severable. The planning permission is a single, indivisible legal instrument authorising a single project as assessed. Once it lapses without completion, the entire development stands without planning permission. This legal protection is to prevent say, a developer building profitable sections of a development while leaving social/ infrastructural sections of development unbuilt such as childcare facilities, sustainable drainage systems etc.

- 4.6 The present application attempts to split the project temporally, treating works up to 10 July 2023 as authorised and those thereafter as unauthorised. That approach has no basis in section 40 and is incompatible with the structure of the Act, which regulates permissions as whole instruments, not as divisible consents.
- 4.7 Inability to conduct lawful EIA and AA on a partial project is an issue for this application. Environmental Impact Assessment and Appropriate Assessment are project-based and cumulative exercises. They require assessment of the entire development as it exists and is proposed, based on plans, drawings and reports that are indivisible from each other.
- 4.8 By excluding the works carried out prior to 11 July 2023 from the substitute consent application, the applicant deprives the Commission of jurisdiction to conduct a lawful EIA and AA of the development as a whole. The environmental baseline has been altered irreversibly by those works, yet they are excluded from the scope of assessment.
- 4.9 This creates an inherent legal defect: the Commission cannot reach the “complete, precise and definitive findings (without lacunae) and conclusions” required by EU law where the development subject to assessment is salami sliced<sup>3</sup>.
- 4.10 Exceptional Circumstances.** Failure to meet the exceptional circumstances test is another legal deficit of this application. The applicant is a Department of State with access to legal, planning, and environmental expertise. It sought and was refused an extension under section 42. It commenced works notwithstanding the absence of a valid extension and persisted in that course while relying on an extension decision that was challenged within limited statutory timeframe and ultimately quashed.
- 4.11 The applicant asserts in the Planning Statement that the circumstances giving rise to the present application satisfy the “exceptional circumstances” requirement applicable to substitute consent. That assertion is not supported by the facts as presented, nor by the legal framework governing substitute consent. The circumstances relied upon by the applicant arise primarily from failures of sequencing, project management, and legal compliance that were entirely within the applicant’s control. Such circumstances, even if regrettable, do not meet the threshold of exceptionality contemplated by the planning code.
- 4.12 The Planning Statement places significant emphasis on the strategic importance of the Ros an Mhíl harbour, the public interest in fisheries infrastructure, and the advanced stage of construction at the time the planning consent expired. It should be noted that when the applicant sought a decision from An Comisiún Pleanála<sup>4</sup> as to whether the development was

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<sup>3</sup> See: Section 4.3 Changes and extensions, Cumulation with other projects and Salami-Slicing at <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52003DC0334>

<sup>4</sup> <https://www.pleanala.ie/en-ie/case/pc0232>

strategic in nature, the Commission decided it was not, agreeing with the inspector who found that “While the additional economic activity would clearly be significant at a local level I do not consider that it can clearly be stated that the economic and social impacts arising would be significant in a regional or national or national context.” However in relation to , the importance of a project, its public utility, or the financial and logistical consequences of delay are not, of themselves, exceptional circumstances for the purposes of substitute consent. The substitute consent regime was not designed to operate as a safety net for developments considered desirable or urgent, but as a narrowly circumscribed mechanism to address specific failures to carry out environmental assessment where EU law so requires. To treat public importance or economic consequence as determinative would be to convert an exceptional regime into a discretionary policy balancing exercise, which the legislation does not in WIDs opinion permit.

- 4.13 The applicant further relies on the proposition that it acted in good faith and on the basis of a reasonable belief that it was entitled to proceed with the development. That position is difficult to reconcile with the documented planning history. The applicant sought an extension of duration in 2022 and was expressly refused on the basis that the statutory criteria were not met. Notwithstanding that refusal, works were subsequently commenced in early 2023 in advance of the expiry of the original permission and continued in reliance on a further extension decision that was ultimately quashed by order of the High Court. The Judicial review of 23/218 decision (a process to which WID had made a submission and highlighted serious environmental and legal lacunae) was lodged in the High Court on the 4<sup>th</sup> of September 2023 with Ex Parte leave granted on the 27<sup>th</sup> October 2023. In those circumstances, the legal risk attaching to the development and indeed continuing the development, despite legal proceedings, for nearly eight further months was neither unforeseeable nor beyond the applicant’s knowledge. (See [appendix 4.1](#) satellite images of the progression of the development.)
- 4.14 This difficulty is compounded by the identity of the applicant. The Department of Agriculture, Food and the Marine is a central government department with access to legal, planning and environmental expertise. As an emanation of the State, it is charged with upholding and exemplifying compliance with domestic and EU law. Errors arising from misinterpretation of statutory provisions, failure to secure valid permissions carry out a lawful AA screening or reliance on legally vulnerable decisions cannot be equated with the type of exceptional or unforeseen circumstances that might, in limited cases, justify recourse to substitute consent. On the contrary, such circumstances point to ordinary administrative failure rather than legal exceptionality.
- 4.15 The Planning Statement also seeks to characterise the present situation as an anomalous or unintended outcome of a complex regulatory environment. That characterisation is not borne out by the record. The statutory framework governing planning permissions, extensions of duration, Appropriate Assessment and Environmental Impact Assessment is well established and was fully engaged by the applicant’s own actions, including the refusal of the section 42

application and the subsequent acknowledgment that Appropriate Assessment was required. The lapse of the original permission, and the legal consequences flowing from that lapse, were the predictable operation of the planning code rather than an external or extraordinary event.

- 4.16 Accepting the applicant's interpretation of exceptionality would carry broader and problematic implications. It would mean that a State authority, having failed to comply with clear statutory requirements and having allowed a permission to lapse, could nevertheless invoke substitute consent to regularise only those elements of a development it chooses to identify, on the basis of project importance and expended costs. That approach would not only undermine the exceptional nature of the substitute consent regime, but would risk unequal treatment between State and non-State developers, incentivise non-compliance (floodgates principal), and erode the preventive purpose of EU environmental law.
- 4.17 For these reasons, the applicant has not demonstrated that the circumstances relied upon in the Planning Statement satisfy the exceptional circumstances test applicable to substitute consent. The difficulties encountered were foreseeable, avoidable, and arose from matters within the applicant's control. They therefore fall outside the narrow category of situations for which substitute consent is lawfully available, and the application cannot meet the statutory threshold required for its consideration or grant.
- 4.18 Furthermore in those circumstances, it cannot plausibly be argued that the applicant "could not reasonably have known" that the development required valid consent and environmental assessment. Nor can administrative error, sequencing failure, or project management decisions by a State authority amount to "exceptional circumstances" within the meaning of section 177K. It must be noted and taken into account that The Department of Agriculture, Food and the Marine is itself a 'competent authority' with responsibility for carrying out environmental Impact assessments and Appropriate Assessment, for example in its 'Aquaculture & Foreshore Management Division' and cannot reasonably be expected to claim it did not know the law as it is required absolutely to know the law where the Habitats Directive, Birds Directive, Water Framework Directive and EIA Directive is concerned. In fact as recently as August 2025 the Department carried out an Appropriate Assessment for a foreshore licence in Ros An Mhil for a project that was not in fact, cumulatively assessed in this application (see appendix 4.2) To accept such circumstances as exceptional would invert the purpose of Part XA and reward non-compliance by the very bodies charged with upholding the law.
- 4.19 Article 4(3)<sup>5</sup> of the Treaty on European Union provides;

*"Pursuant to the principle of sincere cooperation, the Union and the Member States shall, in full mutual respect, assist each other in carrying out tasks which flow from the Treaties. The Member States shall take any appropriate measure, general or particular, to ensure*

*fulfilment of the obligations arising out of the Treaties or resulting from the acts of the institutions of the Union.”*

- 4.20 As an emanation of the State, the applicant is under a heightened obligation to exemplify compliance with EU environmental law, not to test its limits. Likewise, An Coimisiún Pleanála, as the competent authority, is obliged to ensure that domestic procedural mechanisms are not applied in a manner that undermines the effectiveness of EU law.
- 4.21 Permitting a State authority to rely on substitute consent to regularise a partially completed, environmentally sensitive development, where the lapse of permission arose from failures entirely within the control of that authority, would create a structural incentive for non-compliance and risk unequal treatment of non-State developers. Such an outcome raises serious concerns not only under planning and environmental law, but also under EU principles of equality, effectiveness, and potentially State aid if leniency is afforded uniquely to State actors.
- 4.22 For the reasons set out above, the application for substitute consent is legally defective. The lapse of the original permission rendered the entire development unauthorised as a matter of law. The attempt to confine substitute consent to a subset of the works unlawfully fragments a single project and prevents the Commission from carrying out a lawful EIA and AA. The applicant has failed to demonstrate exceptional circumstances, and its status as a Department of State aggravates rather than mitigates that failure. Accordingly, the Commission has no lawful jurisdiction to entertain the application in its present form.
- 5. Conflicts and deficiencies in the submitted EIS/rEIAR/ AA Screening and rNIS.**
- 5.1 The environmental assessment record for the Ros an Mhíl Deep Water Quay development is inconsistent, legally fragmented, in some instances contradictory and incapable of supporting a lawful Appropriate Assessment under Article 6(3) of the Habitats Directive unless the development is assessed in its entirety. This arises from fundamental conflicts between the original Environmental Impact Statement submitted in 2017 in support of planning permission 17/967, the subsequent 2022 “Stage 1” Appropriate Assessment Screening prepared by Aquafact, and the later remedial EIAR and Natura Impact Statement now relied upon in the context of substitute consent.
- 5.2 The Environmental Impact Statement dated June 2017 was prepared to support a prospective development and explicitly framed its assessment on the basis of a greenfield baseline, with impacts assessed as arising from future construction and operation of the quay. While the EIS contains an appendix described as a “Screening for Appropriate Assessment”, it is clear from the structure and content of the EIS that no lawful Appropriate Assessment was undertaken and no Natura Impact Statement was prepared or considered prior to the grant of permission. The EIS itself treats the project as one that could proceed without triggering Article 6(3), notwithstanding the acknowledged presence of Annex II species such as Atlantic salmon and

otter in the receiving environment and reliance on historic ecological data extending back to surveys undertaken in 2002, 2016 and 2017.

- 5.3 This absence of Appropriate Assessment at first consent stage is not cured, but rather highlighted, by the Aquafact report produced later in November 2022 and described as a “Stage 1 Screening Assessment”. That document purports to assess whether the development is likely to have significant effects on nearby European sites in the context of a proposed extension of duration under section 42. However, the report immediately undermines its own characterisation as screening. It expressly states that “it is regarded as necessary that the proposal should be subject to the AA process” and proceeds to undertake detailed analysis of noise, blasting, dredging, suspended sediments, vessel movements, species sensitivity, mitigation measures and conclusions on the maintenance of favourable conservation condition for qualifying interests, including Atlantic salmon, harbour seal and otter.
- 5.4 The structure of the Aquafact report confirms this characterisation as a “Stage 1 screening”. However in contradiction entire sections are devoted to “Potential Impacts of the Development”, “Impact Assessment” and conclusions that the integrity of sites “will not be compromised”. These are not screening functions. Screening is confined, as a matter of law, to identifying whether there is a possibility of significant effects. Once evaluative judgments are made on impacts and integrity, the process has crossed irreversibly into Stage 2 Appropriate Assessment. The Aquafact document therefore constitutes a de facto Appropriate Assessment carried out without being identified, structured or scrutinised as such, and without the preparation of a Natura Impact Statement capable of supporting a lawful Article 6(3) conclusion.
- 5.5 This contradiction is compounded by the applicant’s subsequent conduct. The later submission of a remedial Natura Impact Statement under section 177 of the Planning and Development Act constitutes an express acknowledgement that Appropriate Assessment was, in fact, required for the development. That acknowledgement cannot logically be reconciled with the conclusions of the 2022 screening document, which purported to screen out all qualifying interests and conclude that Stage 2 AA was not required. The two positions are mutually exclusive: either AA was required, or it was not. The applicant’s own remedial actions demonstrate that the earlier screening conclusions cannot be relied upon. This an administrative failure.
- 5.6 Further conflicts arise when the remedial EIAR and NIS are examined in light of the factual development on the ground. Both documents attempt to assess environmental effects by distinguishing between works carried out before and after 11 July 2023. That approach is fundamentally incompatible with the ecological and hydrodynamic reality of the site. The Aquafact screening and the original EIS both describe a single integrated project involving dredging, blasting, caisson installation, reclamation, and quay construction, with impacts arising from the interaction of these activities over time. Once any substantial part of that project is constructed, the baseline environment is permanently altered. Noise propagation pathways,

sediment dynamics, habitat disturbance and species behaviour do not reset or segment by reference to planning timelines and arbitrary separation of project works.

- 5.7 The remedial Natura Impact Statement therefore suffers from a serious methodological flaw: it excludes from assessment the very works that created the altered baseline against which impacts are now to be measured. This prevents any meaningful assessment of cumulative effects, both within the project itself and in combination with other plans or projects in Cashla Bay and the wider receiving environment. An Appropriate Assessment that does not assess the implications of the project “as it exists” cannot lawfully conclude that there will be no adverse effect on site integrity.
- 5.8 In addition, the reliance throughout the assessment material on historic survey data from 2002, 2016 and 2017, without systematic post-construction verification or updated baseline surveys reflecting works already undertaken, further undermines the scientific robustness of the conclusions reached. The Aquafact report itself notes the absence of certain species in later surveys while simultaneously relying on earlier data to discount sensitivity. This compounds the uncertainty inherent in the assessment.
- 5.9 Taken together, the environmental reports submitted demonstrates not merely minor lacunae but a significant failure to align the assessment process with the legal and ecological requirements of the project. The original EIS did not lawfully address Article 6(3). The 2022 screening unlawfully exceeded the scope of screening while denying the need for Appropriate Assessment. The subsequent remedial EIAR and NIS accept that AA is required but attempt to confine that obligation to a truncated portion of a development that is, in fact, indivisible in environmental terms.
- 5.10 For these reasons, the Commission cannot lawfully rely on the existing assessment material to carry out an Appropriate Assessment of the development. Any lawful AA must address the entire Ros an Mhíl Deep Water Quay as constructed and proposed, using up-to-date baseline data and assessing all direct, indirect and cumulative effects in view of the conservation objectives of the relevant European sites. The present application, which excludes substantial parts of the development from assessment, cannot satisfy that legal requirement.
- 5.11 For the convenience of the Commission and Inspector, WID refers to the judgment of Finlay Geoghegan J in *Kelly v An Bord Pleanála*<sup>6</sup> who clearly laid out the legal test in relation to AA screening and stages as follows;

*‘40. It must be recalled that the appropriate assessment, or a stage two assessment, will only arise where, in the stage one screening process, it has been determined (or it has been implicitly accepted) that the proposed development meets the threshold of being considered likely to*

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<sup>6</sup> [2014] IEHC 400

*have significant effects on a European site. Where that is the position, then, in accordance with the preceding case law, the appropriate assessment to be lawfully conducted in summary:*

*(i) Must identify, in the light of the best scientific knowledge in the field, all aspects of the development project which can, by itself or in combination with other plans or projects, affect the European site in the light of its conservation objectives. This clearly requires both examination and analysis.*

*(ii) Must contain complete, precise and definitive findings and conclusions and may not have lacunae or gaps. The requirement for precise and definitive findings and conclusions appears to require analysis, evaluation and decisions. Further, the reference to findings and conclusions in a scientific context requires both findings following analysis and conclusions following an evaluation each in the light of the best scientific knowledge in the field.*

*(iii) May only include a determination that the proposed development will not adversely affect the integrity of any relevant European site where upon the basis of complete, precise and definitive findings and conclusions made the Board decides that no reasonable scientific doubt remains as to the absence of the identified potential effects.*

*41. Hence in my judgment the full appropriate assessment required by s.177V(1) must include all of the above elements and not just the determination expressly referred to in the sub-section.*

**6. Failure to cumulatively assess relevant plans, projects, programs.**

6.1 The rNIS and the earlier Appropriate Assessment Screening report prepared in 2022 both fail to carry out a lawful cumulative assessment of relevant plans, projects and programmes capable of affecting the integrity of the Natura 2000 network. Article 6(3) of the Habitats Directive requires that likely significant effects be assessed not only in isolation but also in combination with other existing and proposed pressures. That obligation has not been met in this case.

6.2 Figure 6.1 below demonstrates that a substantial number of planning permissions exist within the harbour lands and on adjoining lands, all of which have the potential, individually and cumulatively, to impact the receiving environment and nearby European sites. Notwithstanding this, neither the rNIS nor the earlier screening assessment identifies, catalogues or evaluates these consents in a systematic manner, nor do they assess how their effects may interact with the quay development.

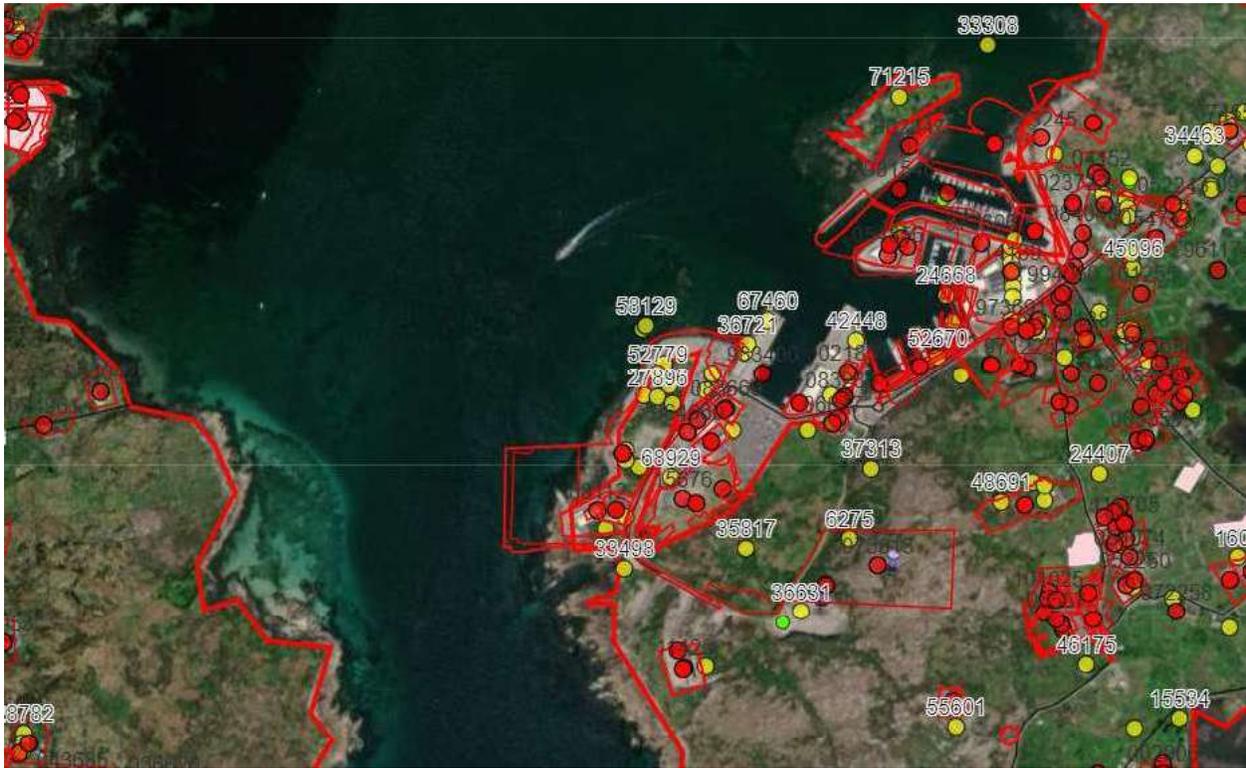


Figure 6.1. Planning developments that may require cumulative assessment.

6.3 Further deficiencies arise in respect of discharges to water. Figure 6.2, drawn from the EPA GIS portal, identifies multiple Section 4 discharges and chemical monitoring points within and adjacent to the bay. These discharges represent existing and ongoing pressures on the receiving waters, yet they are not identified, described or assessed in either the rNIS or the rEIAR. Their omission precludes any meaningful assessment of in-combination effects on water quality and dependent habitats and species.

6.4 This may include W182/88 licenced to Uduas na Gaeltachta which includes sewage effluent and has been licenced since 1992. The original licence, monitoring data and AER should be submitted for this licence and for any other section 4 discharges that may impact water quality or the NATURA2000 network in a cumulative manner. Particularly in light of the fact that the associated planning under Section 37L (323895) appears to utilise this Section 4 discharge and operational waste water treatment plant to treat effluent from this development.

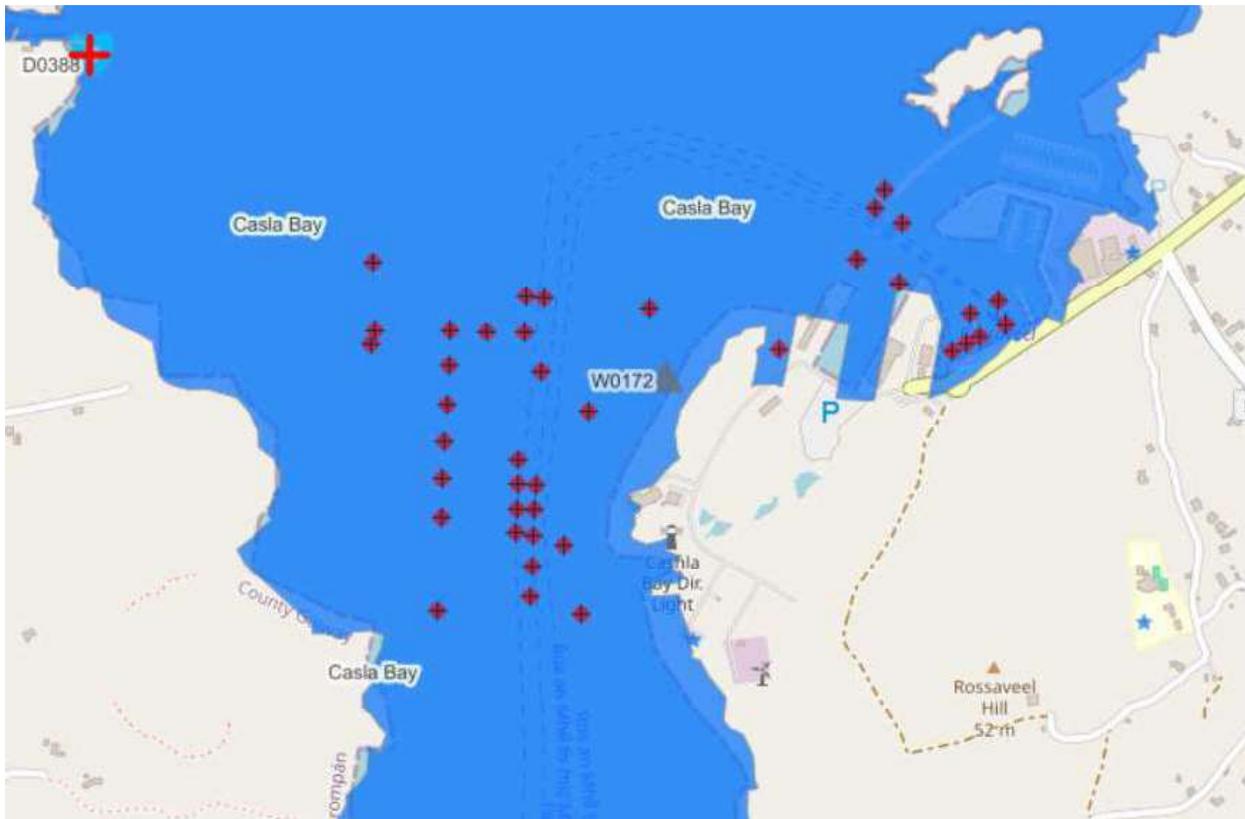


Figure 6.2. Section 4 Discharges and chemical monitoring points.

6.5 Figure 6.3, also derived from the EPA planning portal, indicates that much of the Ros an Mhíl area does not form part of a designated wastewater agglomeration. This strongly suggests the presence of numerous septic tank systems in close proximity to the bay and/or the potential for untreated wastewater discharges directly to coastal waters. Given that Ros an Mhíl functions as a major harbour and ferry hub, it is reasonable to expect that toilet and sanitary facilities are provided for workers, ferry passengers and visitors. The absence of any assessment of the nature, location and treatment of wastewater arising from these activities represents a significant omission. The extent of all wastewater collection systems, septic tanks and direct discharges must be clearly identified and assessed in any application for substitute consent and in the accompanying rEIAR and rNIS.

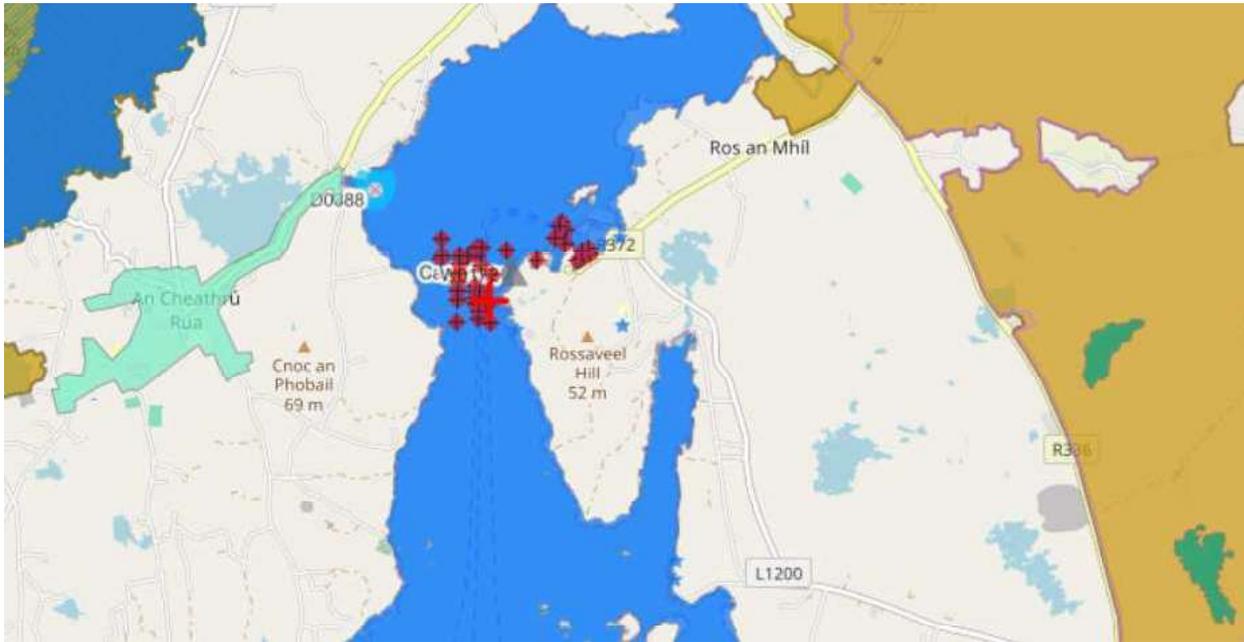


Figure 6.3. EPA GIS Mapping – Orange and light blue identifying Waste Water agglomerations.

6.6 The Carraroe agglomeration (D0388) light blue above, is subject to a Wastewater Discharge Authorisation permitting the discharge of untreated raw sewage to the receiving waters. Notwithstanding the existence of this discharge, Uisce Éireann has provided no information on the nature, volume, frequency or impacts of these discharges in its most recent Annual Environmental Report, as set out at Appendix 6.1. The discharge of raw sewage from this agglomeration has been the subject of repeated infringement warnings and has already resulted in adverse findings against the State by the Court of Justice of the European Union.

6.7 In these circumstances, there is no lawful basis upon which the present development could be authorised without a full and transparent assessment of the raw sewage discharges and their interaction with the quay development. Those discharges constitute a significant and ongoing pressure on the receiving waters and must be assessed cumulatively in the context of Environmental Impact Assessment, Appropriate Assessment under Article 6(3) of the Habitats Directive, and assessment under the Water Framework Directive. The complete failure to identify, quantify or assess these discharges in the application documentation, including the rEIAR and rNIS, represents a serious and fatal lacuna. In the absence of such assessment, the competent authority cannot lawfully conclude that the development will not give rise to adverse effects on protected habitats, species or water bodies.

6.8 Figures 6.4 and 6.5 identifies a quarry located within the harbour lands which appears to have been used as a source of hardcore material for the reclamation of coastal waters associated with the quay development. Mapping from the planning portal raises a serious question as to whether the lands from which this material was extracted are subject to a lawful planning

permission for quarrying. The quarry appears to have been subject to an enforcement notice EN18/077. If the material used in the reclamation works was not lawfully obtained, this introduces a further layer of illegality and environmental risk. Given that the material has already been placed in the coastal environment, this issue requires urgent clarification and assessment, both from a planning compliance perspective and in terms of potential environmental effects.



Figure 6.4 – Quarry pit before works comenced.



Figure 6.5. Quarry pit after works commenced.

6.9 Taken together, these omissions demonstrate a systemic failure to identify and assess cumulative impacts on the Natura 2000 network and the receiving environment. Without a comprehensive and transparent evaluation of all relevant plans, projects, discharges and material sources, the competent authority cannot lawfully conclude that the development, either alone or in combination with other pressures, will not adversely affect the integrity of European sites.

## **7. Water Framework Directive assessment.**

7.1 Water Framework Directive Compliance and Stand Alone Assessment; The Ros an Mhíl Deep Water Quay development is located within and directly affects coastal waters and some tidal rivers to which Directive 2000/60/EC establishing a framework for Community action in the field of water policy (the Water Framework Directive) applies. The obligations imposed by that Directive are legally binding on both the applicant, and on An Coimisiún Pleanála as the competent authority. Those obligations apply independently of, and cumulatively with, the requirements of the Environmental Impact Assessment Directive and the Habitats Directive and must be complied with at the stage of authorisation of any project capable of affecting the status of a surface water body.

7.2 Article 4 of the Water Framework Directive sets out the Directive’s core environmental objectives. Article 4(1)(a)(i) provides, that Member States shall “implement the necessary measures to prevent deterioration of the status of all bodies of surface water”, while Article 4(1)

(a)(ii) further requires Member States to “protect, enhance and restore all bodies of surface water... with the aim of achieving good surface water status”. These obligations are preventive in nature and admit of derogation only under the tightly constrained regime set out in Article 4(7). They require the competent authority to be satisfied, in advance of consent, that a project will not cause deterioration in the status of the water body or compromise the achievement of environmental objectives.

- 7.3 The activities comprising the Ros an Mhíl Deep Water Quay development, including dredging, blasting, rock placement, reclamation of coastal waters and increased vessel movements, are inherently capable of affecting multiple quality elements relevant to Water Framework Directive status classification. These include hydromorphological conditions, sediment transport and deposition, turbidity and suspended solids, seabed integrity, and biological quality elements such as benthic invertebrate communities and fish populations. In addition, the operational use of the harbour introduces ongoing pressures associated with intensified vessel activity, including bilge water discharge, hull cleaning and maintenance residues, fuel handling, accidental spills, and diffuse pollution from port and FHC operations. Each of these pressures is relevant to the Directive’s non-deterioration obligation and must be assessed cumulatively.
- 7.4 Beyond project-specific impacts, the Water Framework Directive requires that deterioration risk be assessed in combination with all existing and authorised pressures affecting the same water body. In this regard, the application documentation fails to identify or assess a range of legally relevant discharges. These include Section 4 discharges to waters, Dumping at sea licences, wastewater discharge licences or authorisations, and discharges arising from areas not served by wastewater agglomerations, which strongly indicate reliance on septic tanks or other on-site wastewater treatment systems in close proximity to the bay. Leakage or malfunction of such systems is a recognised source of nutrient and microbial pollution and is directly relevant to the assessment of ecological and chemical status under the Directive.
- 7.5 The omission of these discharges from the assessment material is particularly serious in the context of a functioning harbour and ferry hub. One would reasonably expect the presence of sanitary facilities for workers, ferry passengers and visitors, as well as service infrastructure associated with vessel berthing and maintenance. The failure to identify how wastewater arising from these activities is collected, treated or discharged prevents any meaningful assessment of cumulative nutrient loading, microbial contamination, or interactions with other pressures already affecting the receiving waters.
- 7.6 The Water Framework Directive does not permit the assessment of deterioration risk on a partial or segmented basis. The legally relevant question is whether the project, as a whole and in its factual and environmental reality, is liable to cause deterioration of the status of a water body or to jeopardise the achievement of environmental objectives. That assessment must take into account the current condition of the water body at the time of decision-making, including

alterations already caused by construction works and ongoing operational pressures.

- 7.7 In the present case, the applicant seeks to confine a purported few paragraphs on Water Framework Directive to works carried out after 11 July 2023, excluding from consideration substantial dredging, blasting and reclamation works undertaken prior to that date, as well as pre-existing and concurrent discharge pressures. This approach is incompatible with Article 4 of the Directive. Once physical works have altered hydromorphology, sediment regimes or seabed conditions, and once additional pollutant pathways have been introduced through construction and operation, those changes form part of the impact against an original baseline against which further deterioration on this secondary (shifting baseline) must be assessed. A assessment that excludes such alterations and pressures and has no modelling of the old and new hydrological regimes, cannot answer the legally required question of whether deterioration has occurred or will occur.
- 7.8 Furthermore, the Directive requires that impacts be assessed in combination with other pressures affecting the same water body. Cashla Bay and its receiving waters are subject to multiple existing and authorised pressures, including wastewater discharges, on-site wastewater treatment systems, harbour-related pollution sources, fisheries activity and vessel traffic. An assessment limited to a subset of works and which fails to identify and assess these pressures in combination artificially isolates impacts that are cumulative in nature and therefore fails to comply with the Directive.
- 7.9 Where deterioration cannot be excluded, a project may proceed only if the strict conditions in Article 4(7) are satisfied. That provision permits derogation from the non-deterioration obligation only where the reasons for the modification are of overriding public interest, no significantly better environmental options exist, and all practicable mitigation measures are taken. The present application does not purport to invoke Article 4(7), nor does it provide the information necessary to support such a derogation. In the absence of a lawful Article 4(7) assessment, the competent authority has no discretion to authorise a project that risks deterioration.
- 7.10 The obligation to ensure compliance with the Water Framework Directive rests squarely with An Coimisiún Pleanála as the decision-maker. It cannot be discharged by deferring assessment to future licensing, operational controls or monitoring regimes, nor by accepting a fragmented application that excludes works already carried out or omits existing discharge pressures that are integral to the project's impact on the water body.
- 7.11 In circumstances where the development has proceeded without a subsisting planning permission, without a lawful Appropriate Assessment, and without a coherent and comprehensive assessment of deterioration risk under the Water Framework Directive that includes all relevant discharges and pollution pathways, the Commission cannot lawfully

conclude that the environmental objectives in Article 4 have been met. The Water Framework Directive therefore constitutes an independent and additional legal barrier to the grant of consent in this case. Until the entire Ros an Mhíl Deep Water Quay development is assessed in its totality, on the basis of current environmental conditions and cumulative impacts, the Commission cannot lawfully authorise its retention, completion or operation.

#### **8. Other Consents:**

- 8.1 A further matter requiring clarification concerns whether the development has been authorised by the appropriate foreshore licences and/or marine area consents, and whether such consents, if any, were obtained in the correct legal sequence relative to planning permission and environmental assessment. The Ros an Mhíl harbour area is subject to extensive and overlapping marine uses, and publicly available mapping indicates a dense proliferation of existing foreshore licences and marine consents within the wider bay. In such circumstances, careful coordination between the planning code and the foreshore and marine consenting regimes is essential to ensure legal certainty and environmental protection.
- 8.2 It is unclear from the application documentation whether all elements of the development, particularly dredging, reclamation, quay construction, placement of materials below the high-water mark, and any associated temporary works, have been authorised under the correct statutory regime. Historically, such works required foreshore licences or leases under the Foreshore Acts, while more recent developments may fall within the scope of the Marine Area Planning Act and require a Marine Area Consent. The application does not clearly identify which regime applies to each component of the works, nor does it set out whether the necessary consents have been granted, are pending, or were relied upon prior to being lawfully in place.
- 8.3 This lack of clarity raises a material concern regarding sequencing. As a matter of law and principle, environmental assessment must inform consent, not follow it. Where foreshore licences or marine consents or dumping at sea licences are required, those consents must be integrated into the overall authorisation framework in a manner that ensures Environmental Impact Assessment, Appropriate Assessment, and Water Framework Directive obligations are satisfied before irreversible works are undertaken. If works proceeded in advance of the requisite foreshore or marine consent, or if such consents were sought or granted on the basis of an expired or legally vulnerable planning permission, this would raise serious questions as to the lawfulness of the development process as a whole.
- 8.4 The issue is particularly acute given the potential for cumulative and in-combination effects arising from multiple foreshore licences and marine consents operating within the same receiving waters. Without a clear account of all relevant foreshore licences and marine area consents, including their status, conditions, and spatial extent, it is not possible for the competent authority to assess cumulative impacts or to determine whether the present development has been authorised consistently with other marine uses in the area.

8.5 Accordingly, clarification is sought as to whether all required foreshore licences and/or marine area consents have been secured for the development, the dates on which any such consents were granted, the statutory basis upon which they were issued, and how they interact with the planning permissions and substitute consent now sought. In the absence of this information, there is a real risk that the development has proceeded without the full suite of legally required marine consents, or in an incorrect sequence, which would constitute a further and independent obstacle to the lawful authorisation of the project.

**9. Actual use for Ros a'Mhil.**

9.1 The application before the Commission proceeds on the basis that the development is a fisheries-led infrastructure project, justified economically by increased landings, processing activity and associated marine services. However, the applicant's own published documentation demonstrates that the long-term economic viability of the Rossaveel Fishery Harbour Centre as a deep-water port is highly contingent on non-fisheries uses, in particular offshore renewable energy activities, notwithstanding that such uses are entirely absent from the description of development, the revised EIAR and the revised Natura Impact Statement.

9.2 The Cost–Benefit Analysis (Appendix 9.1) prepared for the revised deep-water berth (not submitted with this application) expressly identifies offshore renewable energy as a core driver of future economic viability, stating that Rossaveel is “of great strategic importance in servicing both floating and fixed offshore windfarms” and that these developments alone would justify the provision of the deep-water berth.

9.3 The same document makes clear that the financial performance of the harbour, assessed strictly on a fisheries basis, is weak, with the financial appraisal yielding a strongly negative Net Present Value and Benefit-Cost ratio well below unity, and that the positive economic case relies on wider, indirect and future activities rather than existing fisheries demand.

9.4 This reliance on future diversification is further confirmed by the fact that Irish fishing quotas and landings volumes have, since the original permission issued, been substantially revised downwards, a trend acknowledged within the fisheries business planning material itself (see appendix 9.2), which highlights decommissioning, quota reductions and structural contraction within the sector. This plan does not reflect further reductions and constraints in quotas for Irish Fishers in recent EU CAP allocations.

9.5 In such circumstances, the premise that a major capital investment of this scale can be justified on fisheries demand alone is not supported by the evidence now available and appears increasingly unrealistic. Despite this, the application does not include offshore renewable energy activities as part of the project description, nor does it assess the environmental implications of using the quay, dredged areas and hinterland for offshore renewables assembly,

servicing, logistics or intensified vessel movements. There is no assessment in the remedial EIAR or remedial NIS of the cumulative, secondary or induced impacts that would arise from such intensification of use, including increased dredging maintenance, vessel traffic, noise, lighting, pollution risk, or disturbance to qualifying interests of nearby European sites. The omission is particularly significant given that offshore renewable use is repeatedly identified in the applicant's own published economic material (not submitted with this application) as a central justification for the investment.

- 9.6 This disconnect gives rise to a planning and environmental law concern. Either offshore renewable energy operations form part of the project for which consent is now sought, in which case they must be explicitly included in the application and assessed under the EIA and Habitats Directives, or they do not form part of the project, in which case the economic case advanced for the development is materially incomplete and misleading. It appears misleading for the Department to rely on future, unassessed uses to justify the project economically while avoiding assessment of their environmental effects. As there is already very serious breaches of EU law in relation to this development, the Department may have jeopardised future EU funding for this development and or have breached obligation in expenditure of EU funds if already applied.
- 9.7 In those circumstances, and without prejudice to the primary submission that the application is incapable of lawful determination due to jurisdictional defects and failure to assess the entirety of the development, it is submitted in the alternative that any grant of consent would require a strict and explicit condition prohibiting the use of the deep-water berth and associated infrastructure for offshore renewable energy or related industrial marine operations. Such a condition would be necessary to ensure that the development remains within the scope of the project assessed in the revised EIAR and revised NIS, and to prevent subsequent intensification or change of use that has not been subject to appropriate environmental assessment.
- 9.8 Absent either a revised application that transparently incorporates offshore renewable energy uses into the project description, or a condition expressly excluding such uses, the Commission cannot be satisfied that it has before it a complete, coherent and environmentally assessable project. Granting consent in these circumstances would risk facilitating a form of project-splitting, whereby the economic justification relies on unassessed future activities, contrary to the requirements of EU environmental law and the principles of legal certainty and informed decision-making.

## **10. Conclusion**

- 10.1 For the reasons set out in this submission, it is respectfully submitted that the application is incapable of lawful determination and must be refused or otherwise rejected in limine. The development in question was not completed within the statutory duration of the original permission, no lawful extension under section 42 of the Planning and Development Act 2000 (as amended) was validly secured, and no continuous or subsisting planning permission existed at the time the impugned works were carried out. In those circumstances, the development cannot

be artificially segmented so as to treat only post-expiry works as unauthorised, and the statutory preconditions for invoking the substitute consent regime under Part XA are not met. Accordingly, the Board lacks jurisdiction to process or determine the application, and to do so would amount to an unlawful circumvention of the ordinary planning code and of the requirements of EU environmental law.

- 10.2 Without prejudice to that primary position, and in the alternative only, it is submitted that if the Commission were to consider that it has jurisdiction to proceed under Part XA, it cannot lawfully do so on the basis of the information currently before it. The documentation lodged is materially deficient and does not provide a complete, precise or scientifically robust basis upon which the Commission could carry out its obligations under the Environmental Impact Assessment Directive, Article 6 of the Habitats Directive, or the Water Framework Directive. The revised EIAR and revised NIS fail to describe the project in a complete and coherent manner, omit assessment of foreseeable intensification and alternative uses that underpin the economic rationale of the development, and do not adequately address cumulative, in-combination or long-term impacts on European sites, protected species or water bodies.
- 10.3 In those circumstances, and in order to avoid a manifest breach of EU law, it is submitted that the Commission would be required, at a minimum, to seek substantial further information before any consideration of substitute consent could lawfully occur. Such information would need to include, but not be limited to, a complete and accurate project description; a revised rEnvironmental Impact Assessment that assesses all likely significant effects arising from the development as a whole; a revised rNatura Impact Statement capable of supporting a lawful Appropriate Assessment in accordance with Article 6(3) of the Habitats Directive; and a full assessment of compliance with the objectives and non-deterioration obligations of the Water Framework Directive. Absent such information, the Commission cannot reach reasoned, evidence-based conclusions capable of withstanding legal scrutiny.
- 10.4 In summary, the only lawful course open to the Commission is to refuse or invalidate the application in the first instance. Alternatively, and strictly without prejudice to that position, the Commission must require the submission of substantial further information sufficient to enable a lawful, transparent and EU-compliant assessment process. Any attempt to proceed otherwise would undermine the integrity of the planning system, erode public confidence in environmental governance, and expose the decision to inevitable legal challenge. WID will make detailed submissions on the rEIAR, rNIS and rWFD assessment once the appropriate information, surveys, data and cumulative impacts have been updated so as to be scientifically precise and robust and without lacunae.

Yours Sincerely  
Elizabeth Davidson  
Secretary Wild Ireland Defence CLG.

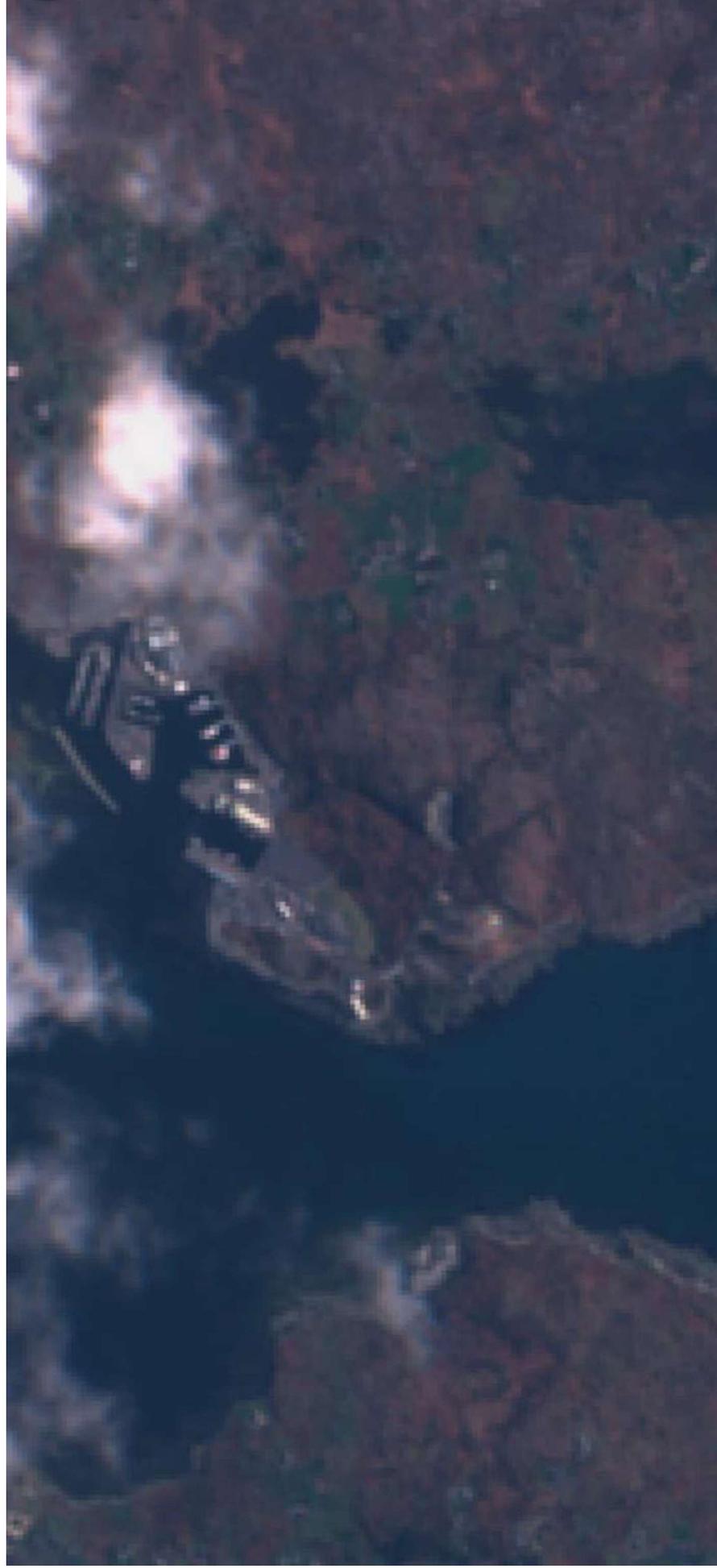
## Appendix 4.1 Satellite Imaging

January 2023 – Pre-construction





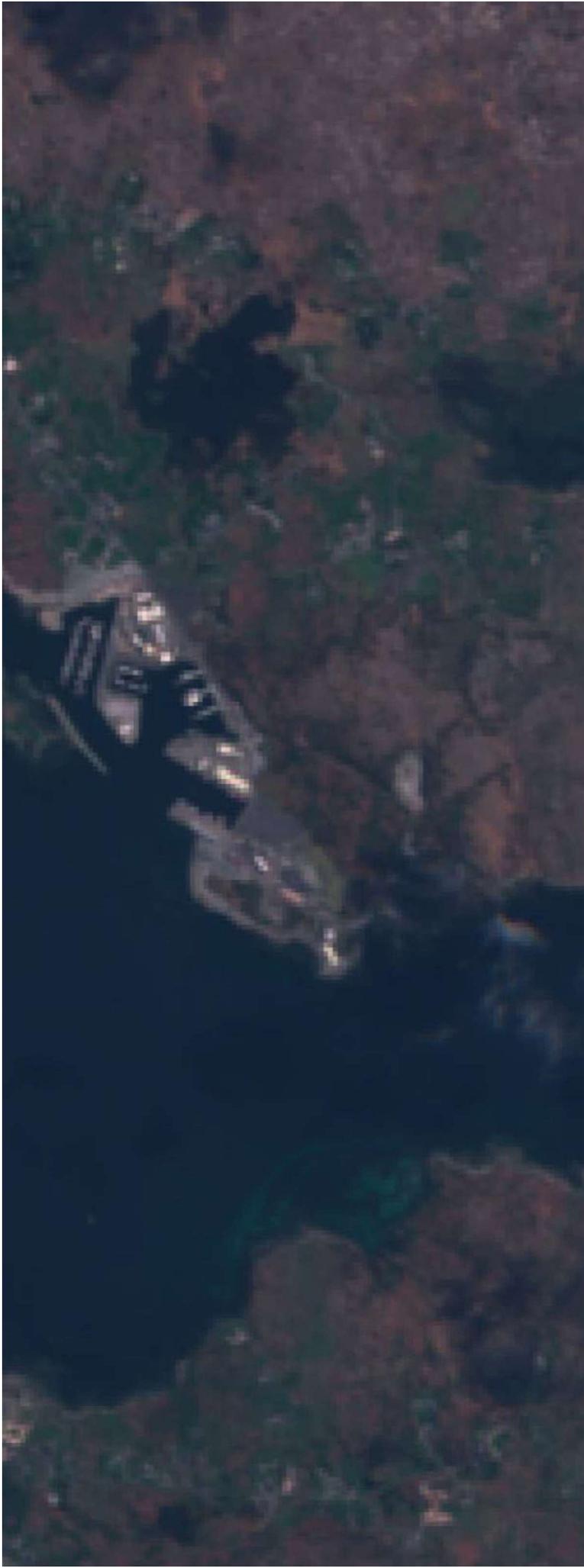
March 2022



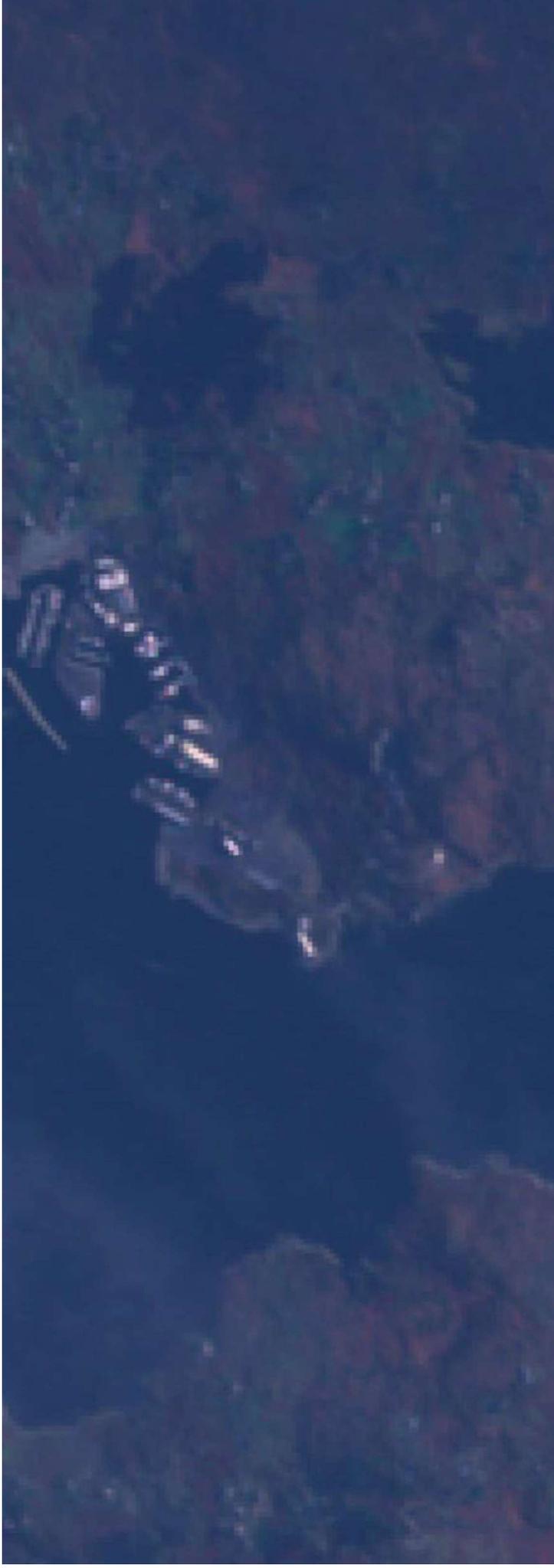
May\June 2022



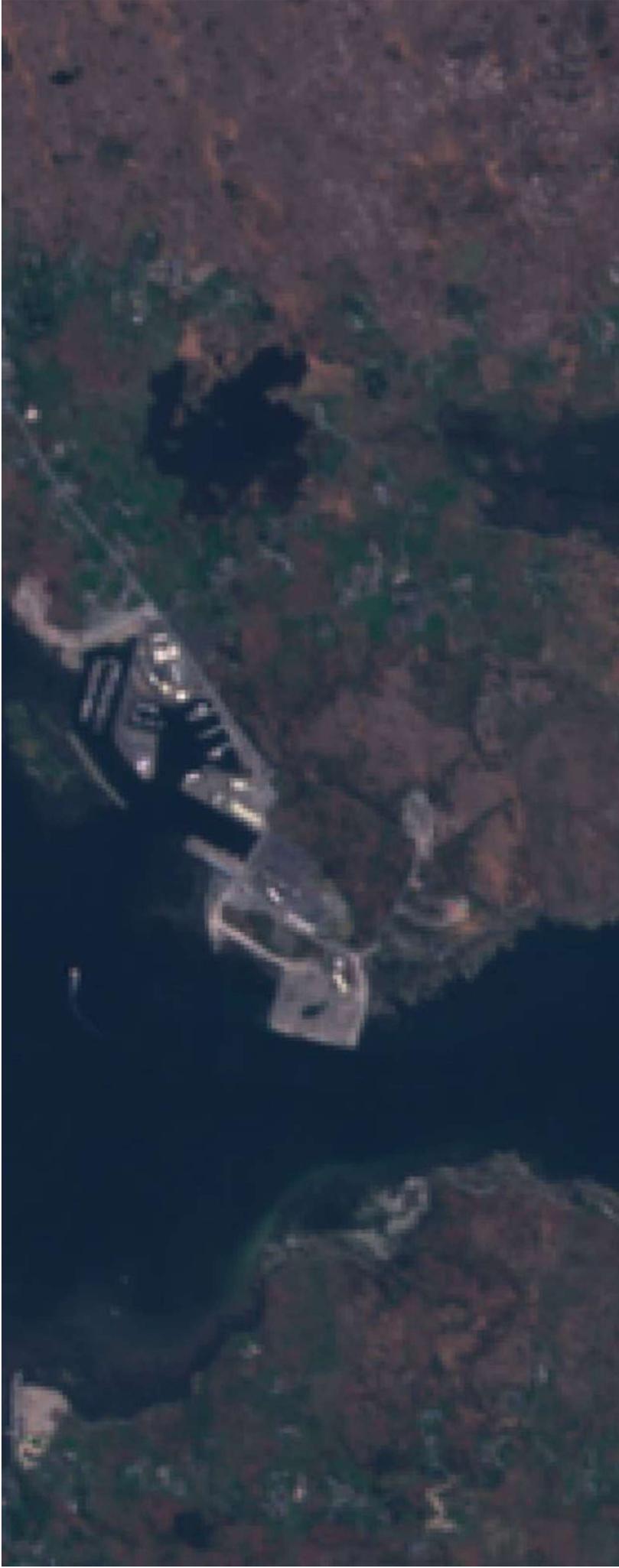
October 2022



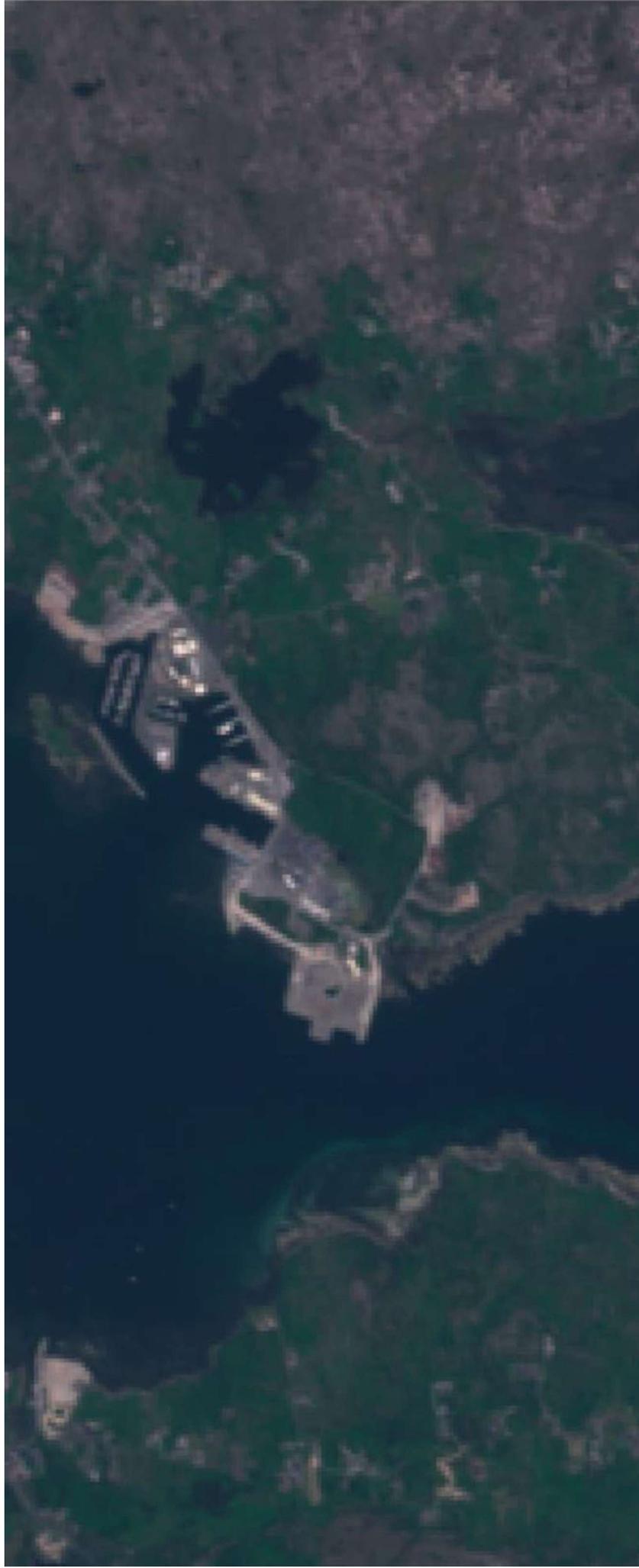
Feb 2023



April 2023



May June 2023



July - 2023



Sept 2023



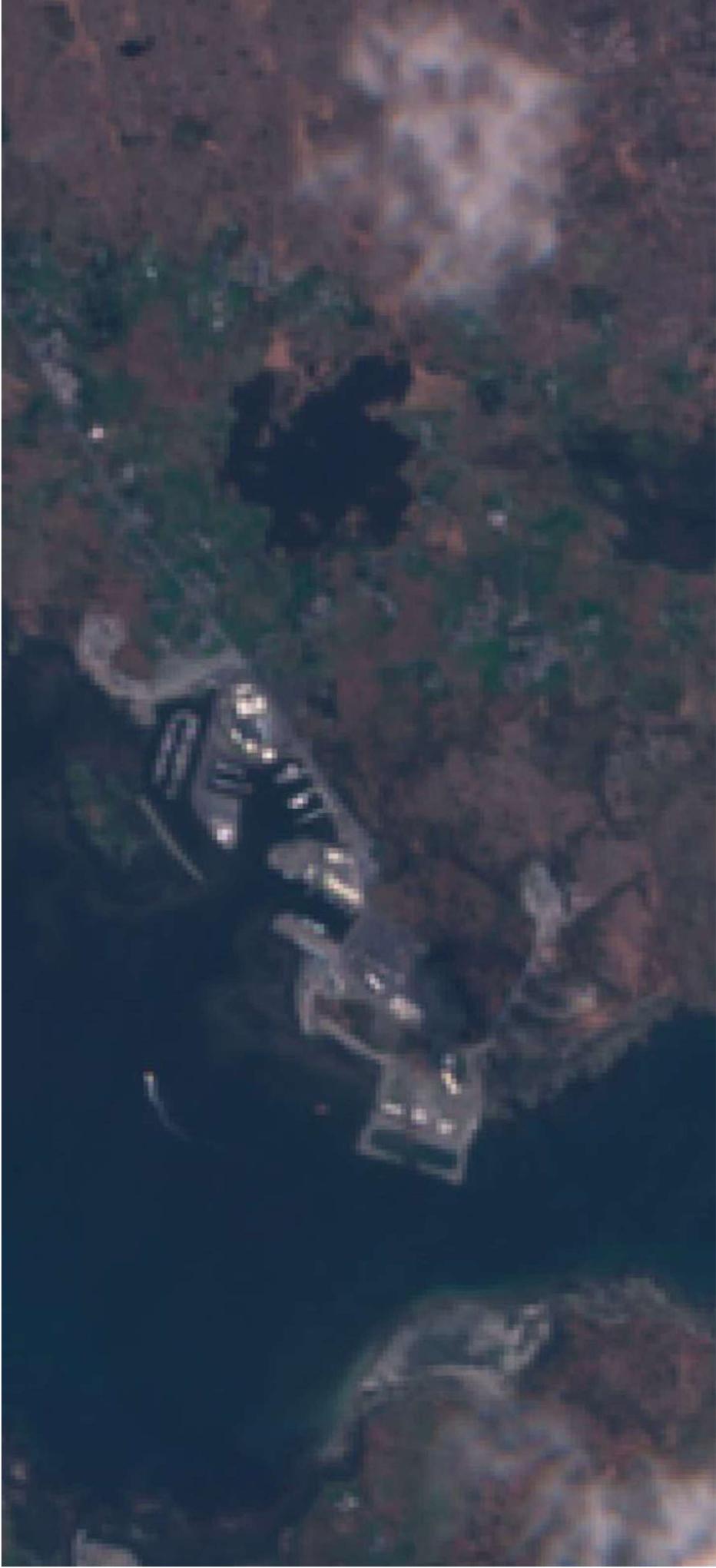
October 2023



January 2024



March 2024



May 2024



August 2024



November 2024



Appendix 4.2  
AA Determination  
DAFM

## APPROPRIATE ASSESSMENT SCREENING DETERMINATION

### Screening Determination for Appropriate Assessment

#### Project Reference:

FC 12/20, Bad Chlós Ros a'Mhíl Teo, at Ros a'Mhíl, Co. Galway.

In accordance with Article 6(3) of the EU Habitats Directive (Directive 92/43/EEC) and Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended ('The Regulations'), the Department of Agriculture, Food and the Marine has undertaken Screening for Appropriate Assessment (AA) to assess, in view of best scientific knowledge and the conservation objectives of relevant European sites, if the proposed project at Ros a'Mhíl, Co. Galway, individually or in combination with other plans or projects would be likely to have a significant effect on a European site.

In accordance with Regulation 42(7) of the EC (Birds and Natural habitats) Regulations 2011, SI 477, as amended, the Minister for State at the Department of Agriculture, Food & the Marine has made a determination following screening that an Appropriate Assessment is **not** required as the project individually or in-combination with other plans or projects is not likely to have a significant effect on any European sites. The risk of likely significant effects on European sites **can** be excluded on the basis of objective evidence. This determination is based on the location, scale, extent and duration of the proposed development, including temporary works, and has not taken account of measures intended to avoid or reduce significant effects on European sites.

Timmy Dooley TD

Minister of State at the Department of Agriculture, Food and the Marine

Date: 18/08/2025



Appendix 6.1  
Carraroe AER

# Annual Environmental Report

2024



Carraroe

D03888-01

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    - 4.1.1 SWO IDENTIFICATION AND INSPECTION SUMMARY REPORT
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- 5 LICENCE SPECIFIC REPORTS**
  - 5.1 HABITATS IMPACT ASSESSMENT
- 6 CERTIFICATION AND SIGN OFF**
  - 6.1 SUMMARY OF AER CONTENTS
- 7 APPENDIX**

# 1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2024 AER

This Annual Environmental Report has been prepared for D0388-01, Carraroe, in Galway in accordance with the requirements of the wastewater discharge licence for the agglomeration. Specified reports where relevant are included as an appendix to the AER.

## 1.1 ANNUAL STATEMENT OF MEASURES

A summary of any improvements undertaken is provided where applicable.

## 1.2 TREATMENT SUMMARY

- Currently there is no treatment provided at Carraroe . Please refer to section 4 for details of the Programme of Improvements.

## 1.3 ELV OVERVIEW

The overall compliance of the final effluent with the Emission Limit Values (ELVs) is shown below. More detailed information on the below ELV's can be found in Section 2.

Discharge Point Reference	Treatment Plant	Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF1200D0388SW001	Carraroe Untreated Discharge	Untreated	Non-Compliant	N/A

## 1.4 LICENCE SPECIFIC REPORTING

Assessment / Report

There are no Licence Specific Reports included in this AER.

## 2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

### 2.1.1 EFFLUENT MONITORING SUMMARY -

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
<b>There is no Effluent data included in the AER.</b>								

Notes:

- 1 – This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied
- 2 – For pH the WWDA specifies a range of pH 6 - 9

#### Cause of Exceedance(s):

**The agglomeration is not served by a wastewater treatment plant.**

#### Significance of Results:

The ELVs set in the Wastewater Discharge License cannot be measured, as there is no influent or effluent data included in the AER.

### 2.1.2 AMBIENT MONITORING SUMMARY FOR THE UNTREATED DISCHARGE TPEFF1200D0388SW001

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections below. For discharges to rivers upstream (U/S) and downstream (D/S) location data is provided. For other ambient points in lakes, coastal or transitional waters, monitoring data from the most appropriate monitoring station is selected.

The table below provides details of ambient monitoring locations and details of any designations as sensitive areas.

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	River Station Code	Bathing Water	Drinking Water	FWPM	Shellfish	WFD Ecological Status
<b>There is no Ambient data included in the AER.</b>							

**Where the receiving water body is not a river or where the data is not in EDEN – the Ambient data will be appended.**

### **Significance of Results:**

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence.

There is no ambient data included in the AER. It is unknown if the ambient monitoring points meet the required EQS.

The EQS relates to the Oxygenation and Nutrient Conditions set out in the Surface Water Regulations 2009.

It is unknown if discharge from the wastewater treatment plant has an observable impact on the water quality.

It is unknown if discharge from the wastewater treatment plant has an observable negative impact on the Water Framework Directive status.

## 3 COMPLAINTS AND INCIDENTS

### 3.1 COMPLAINTS SUMMARY

A summary of complaints of an environmental nature related to the discharge(s) to water from the WWTP and network is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints
<b>There were no relevant environmental complaints in 2024.</b>			

### 3.2 REPORTED INCIDENTS SUMMARY

Environmental incidents that arise in an agglomeration are reported on an on-going basis in accordance with our waste water discharge licences. Where an incident occurs and it is reportable under the licence, it is reported to the Environmental Protection Agency through their Environmental Data Exchange Network, or in some instances by telephone. Some incidents which arise in the agglomeration are recorded by Uisce Éireann but may not be reportable under our licence for example where the incident does not have an impact on environmental performance.

A summary of reported incidents is included below.

#### 3.2.1 SUMMARY OF INCIDENTS

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
<b>There were no reportable incidents in 2024.</b>			

### 3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2024	0
Number of Incidents reported to the EPA via EDEN in 2024	0
Explanation of any discrepancies between the two numbers above	N/A

## 4 INFRASTRUCTURAL ASSESSMENTS AND PROGRAMME OF IMPROVEMENTS

### 4.1 STORM WATER OVERFLOW IDENTIFICATION AND INSPECTION REPORT

A summary of the operation of the storm water overflows and their significance where known is included below:

#### 4.1.1 SWO IDENTIFICATION

WWDL Name / Code for Storm Water Overflow (chamber) where applicable	Irish Grid Ref. (outfall)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2024 (No. of events)	Total volume discharged in 2024 (m <sup>3</sup> )	Monitoring Status
<b>There are no Storm Water Overflows in this Agglomeration.</b>							

The contents presented in this table include the most up to date information available at the time of writing. Any TBC SWO(s) were identified as part of the ongoing National SWO programme and will be updated in subsequent AER(s) once the information is confirmed.

SWO Summary	
How much wastewater discharge by metered SWOs during the year (m <sup>3</sup> )?	Unknown
Is each SWO identified as not meeting DoEHLG Guidance included in the Programme of Improvements?	N/A
The SWO Assessment included the requirements of relevant of WWDL schedules?	N/A
Have the EPA been advised of any additional SWOs / changes to Schedule C3 and A4 under Condition 1.7?	N/A

## 4.2 REPORT ON PROGRESS MADE AND PROPOSALS BEING DEVELOPED TO MEET THE IMPROVEMENT PROGRAMME REQUIREMENTS.

### 4.2.1 SPECIFIED IMPROVEMENT PROGRAMME SUMMARY

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
<b>D0388-SIP:01</b>	Construct a WWTP, as necessary, to comply with ELVs specified in Schedule A: Discharges and Discharge Monitoring, of this licence.	C	22/12/2015	Yes	At Planning Stage		

A summary of the status of any other improvements identified by under Condition 5 assessments- is included below.

### 4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments
<b>No additional improvements planned at this time.</b>				

### 4.2.3 SEWER INTEGRITY RISK ASSESSMENT

N/A

## 5 LICENCE SPECIFIC REPORTS

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Licence Specific Report	Required by licence	Included in this AER
D0388-01-Habitats Impact Assessment	Yes	No

## 6 CERTIFICATION AND SIGN OFF

### 6.1 SUMMARY OF AER CONTENTS

Parameter	Answer
Does the AER include an Executive Summary?	Yes
Does the AER include an assessment of the performance of the Waste Water Works (i.e. have the results of assessments been interpreted against WWDL requirements and or Environmental Quality Standards)?	Yes
Is there a need to advise the EPA for Consideration of a Technical Amendment/Review of the Licence?	Yes
List reason e.g. additional SWO identified	EPA Initiated Review
Is there a need to request/advise the EPA of any modification to the existing WWDL with respect to condition 4 changes to monitoring location, frequency etc	N/A
List reason e.g. changes to monitoring requirements	N/A
Have these processes commenced?	No
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	N/A

I certify that the information given in this Annual Environmental Report is truthful, accurate and complete:

Signed:   Date: 26/05/2025

This AER has been produced by Uisce Éireann's Environmental Information System (EIMS) and has been electronically signed off in that system for and on behalf of,

Eleanor Roche

Head of Environmental Regulation.

## **7 APPENDIX**

There are no Appendices included

## Appendix 9.1 Cost Benefit Analysis

**MWP**

**in association with**  
**Raymond Burke Consulting**

**Cost Benefit Analysis**  
**Revised Deep Water Berth at Rossaveel Fishery**  
**Harbour Centre**

**Department of Agriculture, Food and the Marine**

**2<sup>nd</sup> December 2022**

Project No.	Doc. No.	Rev.	Date	Prepared By	Checked By	Approved By	Status
17648	17648-6109	A	23/08/2021	R Burke	R Burke	P Parle	DRAFT
17648	17648-6109	B	11/10/21	R Burke			Not Issued
17648	17648-6109	C	12/11/21	R Burke	R Burke	P Parle	Draft final
17648	17648-6109	D	15/11/21	R Burke	R Burke	P Parle	Draft final
17648	17648-6109	E	18/11/21	R Burke	R Burke	P Parle	Draft final
17648	17648-6109	F	27/01/22	R Burke	R Burke	P Parle	Final
17648	17648-6109	G	2/12/22	R Burke	R Burke	P Parle	Final

**MWP, Engineering and Environmental Consultants**

**Address:** Park House, Bessboro Road, Blackrock, Cork, T12 X251

**www.mwp.ie**



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Appendix 4: Executive Summary Report from Udaras na Gaeltachta re Rossaveel

Appendix 5: Submission from Fuinneamh Sceirde Teoranta (FST)

## Executive Summary

Planning Permission was granted by Galway County Council in April 2018 for a Deep Water Berth at Rossaveel Fishery Harbour Centre to cost some €29.2 million in 2017 prices in accordance with a design prepared by Mott MacDonald. A Cost Benefit Analysis was finalised by DKM Economic Consultants in June 2017 that found that there was a strong economic case for the development to proceed.

Subsequently, the Department of Agriculture, Food and the Marine (DAFM) commissioned Gavin and Doherty Geosolutions Ltd (GDG) to carry out a peer review on the design completed by Mott MacDonald. The GDG Report proposed a number of design options with the following initial costs.

Design Option	Total Cost based on -12.0m CD berth slot and 200m dia. turning circle	Total Cost based on -12.0m CD berth slot and 150m dia. turning circle	Total Cost based on -10.0m CD berth slot and 150m dia. turning circle
1	€29,293,572.50	N/A	N/A
2A	€21,304,182.90	€20,398,497.90	€19,022,667.90
2B	€21,090,720.50	€20,185,035.50	€18,809,205.50
2C	€18,973,220.50	€18,067,535.50	€16,691,705.50
3	€21,006,705.50	N/A	N/A

In late September 2021, Gavin and Doherty Geosolutions Ltd (GDG) issued a draft Numerical Modelling Report, updated in November 2021, on the Rossaveel Deepwater Quay which indicated that the cost estimate for the open piled quay option is now €25.6m. Their Report also updated the cost estimates based on the -10.0m CD berth slot and 150m dia. turning circle options presented in their earlier Report.

These costs are summarised below.

Design Option	Option Description	Total Cost
2A	Rock ledge profile & smaller caisson units	€24.0m
2B	Rock ledge profile & "L" Wall structure	€22.6m
2C	Rock ledge profile & mass concrete retaining wall	€21.0m
3	Ruukki Pile type retaining wall	€23.3m
4	Open Piled Quay Wall	€25.6m

The Open Pile Quay Wall option cost of €25.6 million was the amount used in estimating the Socio-Economic Impact of the development of the harbour. However, it should be noted that the CBA has been undertaken based on an open quay structure to demonstrate the economic case for a potential worst case scenario (i.e. most expensive feasible option). The actual structure constructed will be decided at the detailed design stage. A 20 per cent reduction in the Capital Cost to €20.5 million would increase the Benefit Cost Ratio by up to 0.5 depending on the volume and mix of landings.

In mid 2021, DAFM commissioned Malachy Walsh and Partners (MWP) to review and update the DKM Cost Benefit Analysis on the basis of the updated costs.

Malachy Walsh and Partners requested Raymond Burke Consulting (RBC) to carry out the CBA on its behalf and DAFM approved this arrangement.

The key findings of this outline Cost Benefit Analysis are as follows:

- Rossaveel is the only fishing port between Dingle and Killybegs and thus is the best located for fishing fleets operating off the west coast of Ireland
- However, it is located in a remote area of the local Gaeltacht that has a range of socio-economic challenges
- The provision of a deep-water berth at Rossaveel would address a range of opportunities including:
  - Catering for landings from foreign vessels
  - Landings by Irish vessels currently landing at Irish and non-Irish ports
  - Enabling the servicing of potential offshore windfarms
  - Reducing congestion and delays to entry because of insufficient water depths
  - Mitigating health and safety risks
  - Facilitating increased cargo landings
  - Acting as a port of refuge
- The economic well-being of Rossaveel is very much inter-twined with the fortunes and future of the Fishery Harbour Centre
- Iasc Mhara Teo is the only industry based in Rossaveel; it is currently closed and its recovery and future as a processing plant are very much dependent on the development progressing. New landings at Rossaveel should see the reactivation of the Iasc Mara Teo fish processing plant and the employment of many local people generating income for the region
- Increased traffic will also result in a growth in local spending by local and foreign vessels in the Rossaveel area. This relates to fuel supplies, food purchases, vessel maintenance, hospitality etc.
- The additional quay space will also facilitate local maritime industry to expand and grow
- The development offers the opportunity to rebalance the West region economy, revitalise the Rossaveel coastal economy and address the BREXIT quota consequences on the fishery sector
- Government policy, as set out in Food Wise 2025, notes that there is a need to develop and initiate practical and competitive measures to attract additional landings into Irish ports and continue to invest significantly in necessary infrastructure at the Fishery Harbour Centres ensuring that sufficient quay space and draught is available to avoid queuing and to facilitate quick vessel turnaround at the ports
- In addition, it is Government policy to encourage, promote and grow local fish processing by fish caught and landed by foreign vessels
- It also supports the goals of the Government's Policies laid out for Coastal Communities in the document: *Our Rural Future: Rural Development Policy 2021 -2025*
- According to the SFPA, in 2020, almost 3,100 tonnes of fish were landed at Rossaveel with a value of some €11.1 million
- Of that 3,100 tonnes, approximately 250 tonnes were landed by foreign vessels

- There is a local fleet of 18 vessels that operate out of Rossaveel that increases to about 35 vessels during the busy season
- An initial outline Cost Benefit Analysis was carried out on the proposed development in accordance with the Public Spending Code that incorporates a Financial Appraisal and an Economic Appraisal
- The socioeconomic CBA takes the net cash flows from the financial appraisal, adjusts them to shadow prices (i.e. true economic prices) including a 30 per cent premium for the shadow price of public funds, and adds the wider economic benefits and the external costs to the calculation. It then applies a social discount rate of 4% real over a timeframe of 20 years
- The Financial Case evaluates the project from the point of view of Rossaveel FHC, while the socioeconomic CBA evaluates it from the point of view of society as a whole
- The three Performance Metrics measured were the Net Present Value (NPV) in €m at constant prices over a 20 year timeframe; the Internal Rate of return (%) and the Benefit Cost Ratio (BCR)
- The elements that make up the Economic Cost Benefit Analysis are:
  - Capital Expenditure including Residuals incorporating Shadow Price of Public Funds
  - Less Operating and Maintenance Costs
  - Incremental Revenue to Rossaveel FHC from fishing catch not currently being landed at any Irish port (but excluding fish that would have been landed at Rossaveel that did not require the development to proceed)
  - Shadow Price of Labour
  - Added Value from local Fish Processing of Irish catch
  - Added value of fish caught and sold locally
  - Added Value from local Spend by landing Vessels at Rossaveel
- The principal risks facing the success of this development relate to
  - Failure to secure anticipated fish catch volumes
  - Diversion to alternative ports without local processing
  - Difficulties with processing anticipated volumes
  - CAPEX increase and/or programme over-running
- Fundamental to the business case for the proposed development is that all landed Irish fish are processed locally; foreign landings are unlikely to be processed locally
- The CBA on the Core Option, which incorporates additional landings of some 5,000 tonnes of primarily pelagic catch annually by foreign vessels and 3,000 tonnes of additional catch from vessels of the Irish fleet, provides the following results on the assumption that only the Irish catch is processed.

	NPV (€m)	IRR (%)	Benefit/Cost Ratio
<b>Financial Analysis</b>	-16.8	-1.8	0.1
<b>Economic Analysis</b>	14.2	7.7	1.6
<b>Exchequer Impact</b>	-10.4	-2.3	0.8

It should be noted that the achievement and sustaining of the additional foreign landings is very much dependent on having a good local Agent in place to service the foreign vessels

- Discussions with BIM supported these projections and confirmed that these annual projections were not unreasonable

- Any local processing of foreign landings would improve the economic return
- However, if the Irish landings of 3,000 tonnes are purely **displaced** catch from other Irish ports, then, in accordance with the principles of the Public Spending Code, the economic impact of these landings should be excluded and the resultant CBA would show a Benefit/Cost Ratio of less than one
- In this particular case, notwithstanding that the Irish fish landings are displaced landings from another Irish port, from a purely Rossaveel FHC perspective, it could be argued that the economic benefits noted under the Core Option are the benefits generated locally from the proposed development
- An option examined was a decrease in the annual average Irish landings to 2,000 tonnes. This generated the following results:

	NPV (€m)	IRR (%)	Benefit/Cost Ratio
<b>Financial Analysis</b>	-17.0	-1.9	0.1
<b>Economic Analysis</b>	4.0	5.1	1.2

- Because of the uncertainty that surrounds all forecasting exercises, the scenario where Capital Costs have been increased by 10 per cent in the Core Option was also examined as follows:

	NPV (€m)	IRR (%)	Benefit/Cost Ratio
<b>Financial Analysis</b>	-18.6	-1.9	0.1
<b>Economic Analysis</b>	12.0	6.9	1.5

- Increasing the Core Option costs by 40 per cent, an extreme case, resulted in the following:

	NPV (€m)	IRR (%)	Benefit/Cost Ratio
<b>Financial Analysis</b>	-24.2	-2.0	0.1
<b>Economic Analysis</b>	5.4	5.0	1.2

- This analysis highlights the sensitivity of CAPEX to the economic analysis but, in all cases, resulted in a benefit /cost ratio in excess of 1.
- Excluding any landings by foreign vessels, an incremental volume of the order of 1,600 tonnes of Irish vessel landed fish annually and processed locally is required to break-even on the proposed CAPEX. It is generally believed that such volumes are achievable
- The overall economic impact of the proposed development as set out under the Core Option may, in fact, be an under-estimate as it should be noted that a prudent and conservative approach has been adopted to projecting expected landings
- Rossaveel has been recognised, because of its location, to be of great strategic importance in servicing both floating and fixed offshore windfarms such as the Sceirde Offshore Wind Energy Farm, recently acquired by the Australian-based multinational, Macquaries' Green Investment Group, that are expected to give rise to many direct and indirect jobs, and significant local spend. This spend is likely to amount to many millions of Euro annually much of which will support the Rossaveel and surroundings economies. These developments alone would justify the provision of the deep-water berth
- A report prepared by Dublin Offshore Consultants Ltd for Udaras na Gaeltachta confirms that Ros a Mhil has the potential to play an important role supporting the significant pipeline of Floating Offshore Wind on the West Coast of Ireland. Its combined attributes of proximity to offshore project locations and consented deepwater harbour infrastructure provide the opportunity for cost effective entry into the offshore energy market for the Port

- Serious consideration should be given to the co-development and funding of the proposed development with Udaras na Gaeltachta/Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media because of their joint interest in and because of the benefits that will accrue to the stakeholders of each

**The overall analysis confirms that there is a business case for the proposed development and that the new berth would be a catalyst for the socio-economic regeneration of Rossaveel and its regional environment.**

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**MWP**

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# 1. Introduction

## 1.1 Overview

Planning Permission was granted by Galway County Council in April 2018 for a 200 metre Deep Water Berth to cost some €29.2 million in 2017 prices at Rossaveel Fishery Harbour Centre in accordance with a design prepared by Mott MacDonald. A Cost Benefit Analysis of the project was finalised by DKM Economic Consultants in June 2017 that found that there was a strong economic case for it to proceed.

Subsequently, the Department of Agriculture, Food and the Marine (DAFM) commissioned Gavin and Doherty Geosolutions Ltd (GDG) to carry out a peer review on the design completed by Mott MacDonald. The GDG Report proposed a number of design options with the following costs.

Design Option	Total Cost based on -12.0m CD berth slot and 200m dia. turning circle	Total Cost based on -12.0m CD berth slot and 150m dia. turning circle	Total Cost based on -10.0m CD berth slot and 150m dia. turning circle
1	€29,293,572.50	N/A	N/A
2A	€21,304,182.90	€20,398,497.90	€19,022,667.90
2B	€21,090,720.50	€20,185,035.50	€18,809,205.50
2C	€18,973,220.50	€18,067,535.50	€16,691,705.50
3	€21,006,705.50	N/A	N/A

In late September 2021, Gavin and Doherty Geosolutions Ltd (GDG) issued a draft Numerical Modelling Report, updated in November 2021, on the Rossaveel Deepwater Quay which indicated that the cost estimate for the open piled quay option is now €25.6m.

It built on previous studies and design work and addresses specific issues that have arisen in relation to the potential impacts of locally generated waves incident on the proposed quay.

A breakdown of the agreed option cost is as follows:

Key Element of Works	Description	Estimated Costs €m
Dredging	Rock and overburden dredging incl. rock slope formation and material re-use and handling	€6.3
Quay Wall Structures	Open-piled construction incl. mobilisation, both drilled tubular piling and sheet piling works	€10.2
Concrete Elements	Reinforced concrete quay slab, concrete pavement and vertical boundary walls	€3.1

Reclamation Fill	Imported rockfill, rock armour revetments and Clause 804 for access road	€5.4
Ancillary Civils Works	Various items incl. drainage, services, perimeter fencing, high mast lighting and marine fendering	€0.8
<b>TOTAL COSTS</b>		<b>€25.6</b>

Their Report also updated the cost estimates based on the -10.0m CD berth slot and 150m dia. turning circle option presented in their earlier Report.

These costs are summarised below.

Design Option	Option Description	Total Cost
2A	Rock ledge profile & smaller caisson units	€24.0m
2B	Rock ledge profile & "L" Wall structure	€22.6m
2C	Rock ledge profile & mass concrete retaining wall	€21.0m
3	Ruukki Pile type retaining wall	€23.3m
4	Open Piled Quay Wall	€25.6m

The Open Pile Quay Wall option cost was the amount used in estimating the Socio-Economic Impact of the development of the harbour. However, it should be noted that the CBA has been undertaken based on an open quay structure to demonstrate the economic case for a potential worst case scenario (i.e. most expensive feasible option). The actual structure constructed will be decided at the detailed design stage. A 20 per cent reduction in the Capital Cost to €20.5 million would increase the Benefit Cost Ratio by up to 0.5 depending on the option.

DAFM commissioned Malachy Walsh and Partners (MWP) to review and update the DKM Cost Benefit Analysis on the basis of the original updated costs, which were subsequently replaced by the most recent costs.

In addition, there was a requirement to review the CBA Report previously carried out by DKM Economic Consultants Ltd.

Malachy Walsh and Partners requested Raymond Burke Consulting (RBC) to carry out the CBA on its behalf and DAFM approved this arrangement.

## 1.2 Rossaveel Fishery Harbour Centre

### 1.2.1 Summary Profile

Rossaveel (Ros an Mhil), located in the Connemara Gaeltacht, is the largest and busiest port in County Galway and acts as the main base for the Galway and Aran Co-op fishing fleet. As well as being a busy fishing port, its proximity to the Aran Islands also makes Rossaveel FHC invaluable to the residents of the islands and acts as a catalyst for the development of the island based tourism industry. Rossaveel is located, approximately 40 kilometres to the west of Galway city, within the functional area of Galway County Council.

**Map 1.1: Map showing location of Rossaveel Fishery Harbour Centre**



Rossaveel FHC is a distinct harbour authority and designated fishery harbour centre managed by the Department of Agriculture, Food and the Marine (DAFM), under the Fishery Harbour Centres Acts.

The next FHC to the south of Ros an Mhil is Dingle, approximately 90 nautical miles, and to the north is Killybegs, 120 nautical miles away.

Rossaveel FHC has some 215 metres of quay and an ice plant. Maximum draft is 8 metres.

A report prepared by Oxford Economics in 2018 for BIM, entitled *The Economic Impact of the Seafood Sector: Ros a Mhil*, found that the total economic contribution of the seafood sector at Rossaveel equated to €34.1 million of GVA across the West economy. The port's seafood sector supported an estimated 595 jobs across the region and generated €4.3 million in tax revenues from wages of almost €14 million.

In 2020, according to the SFPA, some 3,100 tonnes of fish were landed by Irish and foreign vessels in Rossaveel worth some €11.1 million.

- Rates charged at Rossaveel and other Fishery Harbour Centres are set out in Statutory Instrument Number 214 of 2012<sup>1</sup> entitled Fishery Harbour Centres (Rates and Charges) Order 2012.

### **1.2.2 Proposed Development**

DAFM proposes to develop a new deep water quay that will enable the harbour to accommodate larger fishing vessels. The quay will also help facilitate the development of opportunities in the fishing sector which in turn will support the continued operation and sustainable development of Rossaveel Harbour.

The quay will provide 200m of outside berthing frontage which, along with associated dredging works, will make Rossaveel Harbour a viable location for increased fish landings, particularly by larger Irish and foreign vessels.

To facilitate berthing by these vessels, a 30m wide x 200m long pocket directly adjacent to the quay will be dredged to a depth of -12m Chart Datum (mCD).

In addition, a vessel approach corridor of approximately 600m length and a vessel turning circle of 200m diameter will be dredged to a depth of -8m mCD. A reclamation area will also be constructed directly behind the quay which will link to the existing onshore components of Rossaveel Harbour.

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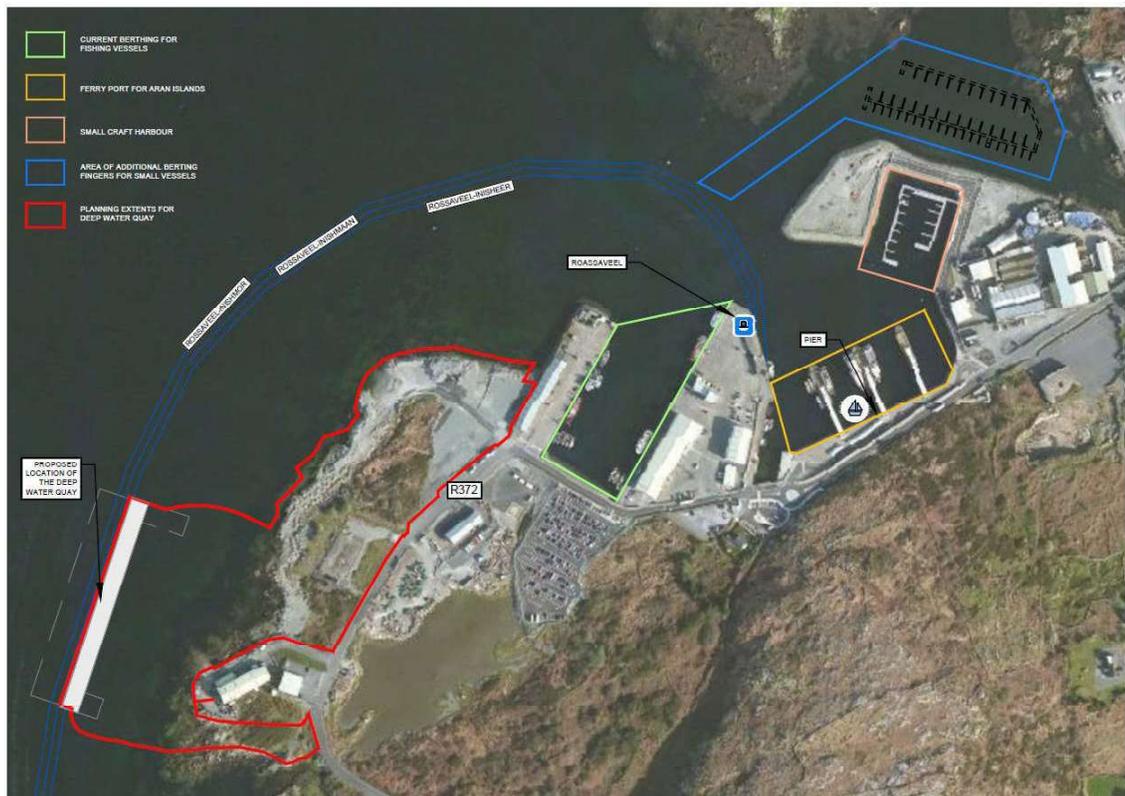
<sup>1</sup>

<https://www.agriculture.gov.ie/media/migration/seafood/fisheryharbours/ratesandchargesatfisheryharbourcentres/FisheryHarbourCentresRatesChargesOrder2012.pdf>

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Figure 1.1: Location of Functions



### 1.2.3 Planning Status

An application for the proposed development was submitted to Galway County Council in late June 2017 and planning permission for the development was granted in April 2018 subject to a number of conditions. Permission lapses in April 2023.

### 1.3 The Case for Development according to the Rossaveel Harbour Development Committee

The case for the Deep Water Berth has been summarised by the Rossaveel Harbour Development Committee (Coiste Tacaíocht Calaphort Ros a Mhíl) as follows:

- The existing harbour is too shallow and cannot accommodate vessels over 30m in Length from the Irish fishing fleet and no foreign vessels can be accommodated in the harbour.
- Rossaveel is the only harbour where a deep water pier can be developed between Killybegs and Foynes.
- It is a sheltered harbour so (there is) no need for an expensive break-water and the channel has a natural depth in excess of eight meters at the lowest low tide.

- Between Udarás Na Gaeltachta and DAFM there is a total of 84 acres of land in State ownership (ref: Mott McDonald Land Use Zoning Study 2007), adjacent to the port, available for development.
- Planning permission and all other necessary permissions are in place up to April 2023.(Galway County Council, Ref No 17/967)
- A number of studies have been carried out on the project to date, some by DAFM and one by Coiste Tacaíocht Chalaphort Ros a Mhíl. All of the studies concluded that this deep water pier should be built.
- The proposed project is in the Government Capital Programme
- Option 2 C on page 44 of the Quay Wall Peer Review Study September 2020,(a 200 m pier with a depth alongside of –12 m and a turning circle of 150 m), estimates the cost at just over €18m.
- Rossaveal port is located in An Gaeltacht where a high percentage of people use Gaeilge on a daily basis. Creation of jobs in this area aligns with Government's policy to support the transmission of Irish as a living language.
- This infrastructure would provide the basis to create 300 jobs in the Offshore Renewable Energy Sector – as presented by Mark De Faoite of Udarás Na Gaeltachta.
- It is the policy of the current Government to reduce carbon emissions by 51% by the end of this decade.

## 1.4 The Significance of the Irish Fishing Sector

### 1.4.1 Government Policy

Current government policy<sup>2</sup>, as set out in the Programme for Government, is to recognise the importance of the fisheries, tourism, and other sectors that support balanced regional development and employment noting that everything must be done to protect marine biodiversity and to secure a sustainable future for the fisheries sector, while supporting coastal communities

Specifically it states that the Government will

*Invest strategically in harbour infrastructure to attract increased landings into Ireland of sustainably caught fish in our waters, driving the development of the seafood processing sector and the blue economy in coastal communities.*

The National Development Plan 2021 – 2030<sup>3</sup>, the National Marine Planning Framework<sup>4</sup> and Food Vision 2030<sup>5</sup> equally recognises the importance of the

<sup>2</sup> Programme for Government – Our Shared Future, June 2020

<sup>3</sup> National Development Plan 2021 – 2030, Government of Ireland, October 2021

<sup>4</sup> National Marine Planning Framework, Department of Housing, Local Government and Heritage

<sup>5</sup> Food Vision 2030 – A World Leader in Sustainable Food Systems, Department of Agriculture, Food and the Marine, August 2021

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fishing sector for the Irish economy and stating that Ports are key facilitators and enablers of economic development in general. As such, their strategic development is supported as a key objective in the Government's National Development Plan.

Food Vision notes that fishers, farmers and food producers are at the core of the Strategy and, working with Ireland's world-class food and drinks businesses, will ensure the sector's continued contribution to the national economy, and especially to rural and coastal communities.

The Department of Agriculture, Food and the Marine reflects these objectives in its current Statement of Strategy 2021 - 2024 as an Action (4.3.3) in respect of Objective 4.3 as follows:

*Manage utilisation of sea fisheries and aquaculture resources in consultation with stakeholders to promote environmental sustainability and the development of the sector's economic and social contribution to rural and coastal communities*

In the Government's policy document, *Our Rural Future: Rural Development Policy 2021 -2025*, it notes in Chapter 10, *Supporting the Sustainability of our Islands and Coastal Communities* that the marine economy is a key enabler of effective regional development, especially in remote coastal communities.

Government will seek to ensure that coastal communities continue to benefit from the unique characteristics and attributes of Ireland's coastline and its natural resources in a sustainable manner. Government will achieve this through developing and implementing a National Marine Planning Framework and investing in coastal communities to support economic growth.

Specifically, it adds that offshore renewable energy projects will also offer employment opportunities around the coast of Ireland. Further development of offshore energy projects will support future diversification in employment and ensure that coastal areas benefit from opportunities in this sector, including through supply chain opportunities.

#### **1.4.2 The Ocean Economy<sup>6</sup>**

Ocean-based economic activity makes an important contribution to Ireland's economy. Recent estimates by the Socio-Economic Marine Research Unit (SEMRU) at NUI Galway put the overall turnover of Ireland's ocean economy

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<sup>6</sup> Challenges and Opportunities for Ireland's Major Ocean Economy Industries, SEMRU, June 2020  
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in 2019 at €5.8 billion. Ocean economy industries directly contribute nearly €2 billion in value added (approximately 1 per cent of GNI\*) to the Irish economy and provide almost 31,000 jobs. The ocean economy has an especially important role to play in regional development. The employment provided by ocean economy industries has a wide geographical spread, with most jobs in the sector located outside of Dublin. Moreover, the figures above refer only to the direct economic contribution of the ocean economy. Measures that take into account the indirect activity and employment generated from ocean-based industries show markedly higher contributions to overall economic activity, typically about twice that of the direct contribution.

In 2020, according to BIM, the estimated GDP of the Irish sea fishing industry was worth some €1.09 billion including domestic consumption of €406m and imports/exports worth €263 million. This is a decline of almost 12 per cent on 2019 values.

The value of Irish seafood was €526 million including the value of Aquaculture worth €180 million. Some €346 million in seafood was landed by Irish and non-Irish boats in Irish ports during the year.

Due primarily to the global Covid-19 pandemic Ireland's seafood economy declined in 2020, with a drop of 12% (-€142million) compared to 2019, giving a total value of €1.1 billion. This was driven mainly by a reduction of 18% in domestic consumption due to the closure of the food-service sector with additional impacts of a 17% reduction (-€44 million) in private investment and an 8% decline (-€50 million) in exports. Global markets faced severe disruption from the Covid-19 pandemic, and when added to the continued uncertainty from the UK's departure from the EU, this made for challenging trading conditions.

Despite these challenges the seafood sector remained resilient and adapted to the disruption the market faced. While there was a decrease of 18% in domestic consumption to €406 million, mainly due to a fall in sales in food service, this was somewhat offset by a 6% increase (€18m) in retail sales. There was also a reduction in private investment to €213 million (-17%) reflecting the uncertainty in the markets leading to cautious activity from many seafood businesses. There was also a decline in our seafood balance of trade (exports – imports) which fell by €28 million (-10%) to €263 million. Overall investment in the sector was €416 million, equivalent to 39% of seafood GDP, a slight increase compared to 2019, underlining the importance of strong public sector support through times of economic turbulence.

The volume of seafood produced by the Irish seafood sector surpassed 220,000 tonnes with a value of €394m. While less than 20% of this volume was produced by the aquaculture sector it contributed 46% of the total value.

The volume of landings into Irish ports fell by 4% in 2020, to 252,000 tonnes, this decline being driven by the Irish fleet, landing 10% less than 2019 while landing volumes of non-Irish vessels increased by 17%. The value of landings fell 18% in 2020 to €346m with the Irish fleet contributing the most to this decline falling by 26% in value. Most ports saw a decline in the volume and value of landings in 2020 with Killybegs seeing a 9% decline in volume (8% in value) and Castletownbere landings declining by 16% in volume (20% in value). Mackerel was the most valuable species landed by the Irish fleet with over 60,000 tonnes landed worth €80m. This was an increase in value of 3% on 2019.

Landings of Dublin Bay prawn declined by around 40% in volume and value terms after a difficult year in which many of the main international markets for this species were shut down

#### **1.4.3 Economic Significance of the Seafood Sector to Rosaveel**

A report prepared by Oxford Economics in 2018 for BIM, entitled *The Economic Impact of the Seafood Sector: Ros a Mhíl*, clearly showed the importance and value of the seafood sector to the Rosaveel economy.

The consultants found that the sector directly generated some €50 million in turnover, supporting nearly 440 direct jobs. Aquaculture was the largest of the three seafood sub-sectors generating an estimated €35 million in turnover, followed by fish processing (€15 million) and commercial fishing (€9 million). When translated into GVA, the seafood sector directly contributed an estimated €24 million to the local port economy.

When the indirect and induced effects are calculated, the total economic contribution of the seafood sector at Rosaveel equated to €34.1 million of GVA across the West economy in 2018. The port's seafood sector supported an estimated 595 jobs across the region and generated €4.3 million in tax revenues from wages of almost €14 million.

A survey carried out to establish the main constraint on growth found that *Quotas and Regulations* were the primary constraint for 37 per cent of respondents followed by *Competition and Market Issues*, and *Overfishing* by

12 per cent each. *Harbour Facilities* was only mentioned by 2 per cent of respondents.

As Oxford Economics did not produce a Report for the Seafood Sector at a national level, it is not possible to relate and compare the economic impact of Rossaveel with national figures.

#### **1.4.4 Other Developments**

##### **BREXIT**

The UK's withdrawal from the European Union under Article 50 of the Treaty on European Union (BREXIT) has had a major impact on the €1 billion Irish seafood economy with Irish quota transfers to the UK from the EU under the TCA contributing around €43m of the total estimated €199m of quotas transferred. This amounts to a 15% reduction compared to the overall value of the 2020 Irish quotas which compares unfavourably with other EU Member States which, proportionally, contributed far less.

The seafood sector and dependent coastal communities are amongst the areas most negatively impacted by the EU/UK Trade & Co-operation Agreement. The impacts are significant, immediate and long lasting, and need to be addressed.

Based on the preliminary analysis of available data carried out by the Department of Agriculture, Food and the Marine (DAFM) with the assistance of the Marine Institute and BIM, under the TCA, Ireland will lose 26,412 tonnes of quota, of which 23,500 tonnes is pelagic and 2,366 tonnes is demersal species, valued at around €43m over the period 2021-2026. These figures are estimated on the mean fish price per species in 2019 from Irish Sales Notes data, 2020 Irish quotas and assumes 100% quota uptake.

While there may be some re-adjustment in the medium to longer term through possibly quota swaps, the TCA represents a significant and permanent loss of quota. Pelagic stocks account for 67% of the total loss in quota value, with Nephrops making up 20%. Whitefish and deepwater stocks combined make up for the remaining 13%.

The objective of the EU Brexit Adjustment Reserve is “to provide support to counter the adverse consequences of the withdrawal of the United Kingdom from the Union in Member States, regions and sectors, in particular those that are worst affected by that withdrawal, and to mitigate the related impact on the economic, social and territorial cohesion”.

As Rossaveel has been affected by BREXIT, the Brexit Adjustment Reserve could therefore support employment, businesses and local communities negatively affected by Brexit, including those in the fishing industry.

### **Over-fishing**

It is understood that an analysis by the European Commission has concluded that during the period 2012-2016, Ireland overfished its quota of mackerel by 28,700 tonnes; its horse mackerel quota by 8,100 tonnes and blue whiting by 5,600 tonnes.

This over-fishing may see tens of thousands of tonnes of pelagic and whitefish deducted from its quotas in the coming years and Ireland faces losing up to €40 million in European funding.

The reduction in quotas will have a significant impact on current whitefish landings and potential pelagic landings by Irish fishers in Rossaveel which could be attracted by the proposed new berth.

## **1.5 Report of the Seafood Task Force<sup>7</sup>**

According to the Report of the Seafood Task Force published in October 2021, the seafood industry supports some of the most fragile and vulnerable communities in the State. The implication of any reduction in competitiveness or resilience can send economic and social shock waves through their communities. The complexity and interplay between jobs at sea and their supporting communities is well recognised and any loss of profitability at sea leaves an economic vacuum ashore.

Much of our marine public infrastructure (piers, harbours and facilities) is old and is holding back the full development of a range of marine water-based activity. Accordingly, and in line with the Terms of reference, the Task Force has recommended an €80 million initiative for the development of publicly owned marine infrastructure. The resulting infrastructure development can provide a platform for the development of new and diversified economic activity in our coastal communities.

The provision this modernized, publicly owned marine infrastructure will be a key enabler in allowing integrated application at a local level of the Task Force's initiatives for the seafood sector, such as community led local development and tourism initiatives.

Under the Trade & Cooperation Agreement (TCA) between the EU and UK, Ireland will

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<sup>7</sup> Report of the Seafood Sector Task Force "Navigating Change – The way forward for our Seafood Sector in the wake of the EU/UK Trade & Cooperation Agreement", October 2021  
2<sup>nd</sup> Dec 22

lose 26,412 tonnes of quota per year, on a phased basis up to 2026, valued at around €43 million. The seafood sector and dependent coastal communities are amongst the areas most negatively impacted by the TCA. The impacts are significant, immediate and long lasting. The impacts of the TCA on the Seafood Sector and Coastal Communities need to be addressed. While much of the quota reduction will be felt at the 6 DAFM Fishery Harbour Centres and 5 larger County Council ports (Clogherhead, Kilmore Quay, Union Hall, Baltimore and Greencastle) the wider, direct and indirect impacts of Brexit will be felt by communities around the entire coast who are dependent on fisheries, aquaculture, and spending power they generate at a local level. and will have direct downstream impact on the processing sector and workforce in coastal communities.

A key enabler in offsetting the implications, for local communities, of the Brexit related adjustments to the fisheries sector is regeneration and development of many of the coastal structures around the coastline. Many of these structures, especially those of a minor nature and which are important landmarks to local communities, have declined in both their structural integrity and effective usage over the years. A new focus on innovative restoration would see many of these structures delivering new benefits to smaller and often remote communities. In some instances, this investment could result in these structures becoming different in nature to their original functionality, with diversification into leisure, recreational and other usages, such as aquaculture support facilities for small vessel launch to access nearby sites.

The scale of investment needed to address the Brexit losses, to sustain a new sense of momentum and transition in our seafood and coastal communities will be significant. The overall funding required has been determined by the Task Force, as in the order of €423.3 million.

## 1.6 Structure of the Report

The structure of this Report is as follows.

Following this Introduction which highlights the significance of the Fishery Sector for the Irish economy, there are Chapters dealing with

- A profile of Rossaveel Fishery Harbour Centre and its importance in and for the development of the fishing sector; the Profile also includes current facilities at and key stakeholders of Rossaveel Fishery Harbour Centre
- A description of the Proposed Development
- An Outline Cost Benefit Analysis including Risk and Sensitivity Analyses
- A Conclusion chapter

## 1.7 Acknowledgements

Raymond Burke would like to thank Capt Mairtin Mylotte, Harbour Master Rossaveel Fishery Harbour Centre, Mr Padraic O'Toole, Deputy Harbour Master and Mr Gerry Egan, Engineer, as well as the staff of the Department of Agriculture, Food and the Marine including Mr Noel Clancy and Mr Noel O'Murchu.

Thanks are also due to the members of Coiste Tacaíochta Chalaphort Ros a Mhíl including Máirtín Ó'Conghaile, Cathaoirleach, Nioclás O'Conchubhair and Mr Cathal Groomell, Runai who was also Chief Executive of Iasc Mara Teo.

Other consultees were:

- Capt Fergal Hegarty, Harbour Master, Killybegs Fishery Harbour Centre
- Mr Pat Fitzpatrick, MV Shauna Ann
- Mr Cornelio Diarmuid O'Donovan
- Mr Grattan Healy, Fuinneamh Sceirde Teoranta
- Mr Máirtín Eidge O'Conghaile "Realt Ara",
- Mr Donal Kelly, CEO, Fast Fish Ltd.
- Mr Anthony Sheehy Knollway Ltd
- Mr Aodhan Fitzgerald, The Marine Institute

He would also like to thank Mr Mark De Faoite (White), *Stiúrthóir Fiontraíochta, Fostaíochta & Maoine, Udaras na Gaeltachta*, Mr Peter Coyle, Chairman Marine Renewables Industry Association (MRIA), Mr John Paul Molloy, SFPA, Mr Dominic Rihan Head of Economic and Strategic Services, BIM and Mr Sean Griffin, Aran Fishermen's Co-Op.

## 2. Rossaveel (Ros an Mhíl) Fishery Harbour Centre – A Profile

In this chapter, we provide a brief profile of the Rossaveel Fishery Harbour Centre, its facilities and principal stakeholders.

Figure 2.1: Ros an Mhíl Harbour



### 2.1 Socio-Economic Profile

#### 2.1.1 Planning Vision and Context

Galway County Council, in its most recent Development Plan, recognises that the presence of the Ros an Mhíl deep water port facility - one of the largest fishing ports in the country - is an economic strength and opportunity for the county noting that Rossaveel is the main base for the Galway and Árann Deep-Sea fishing fleet and is a major ferry port for passengers and goods for the three Oileáin Árann Islands.

**A key objective of the Plan, Objective TI 24 – Sustainable Development of Ports, Harbours, Piers and Slipways is to “Support the development of Ros an Mhíl Harbour as a deep water port and support and facilitate improvements and maintenance to other harbours including Inis Oirr and Inis Meáin, piers and slipways and consider any new marine infrastructure where appropriate”.**

## 2.1.2 Population

For the purposes of this analysis, the Rossaveel Harbour area comprises the four Electoral Divisions of Bear, Curryglass and Killaconenagh, and between 2006 and 2016, the population growth in the area was 4.5 per cent compared with a national growth of 12.3 per cent pointing towards a potential underlying weakness of the Rossaveel Harbour area.

**Table 2.1: Population**

Rossaveal	1991	1996	2006	2011	2016
<b>Arainn</b>	1,322	1,303	1,225	1,251	1,226
<b>Kilcummin</b>	1,241	1,273	1,304	1,315	1,314
<b>Sailearna</b>	1,051	1,148	1,362	1,448	1,453
<b>An Crompan</b>	2,077	2,167	2,294	2,505	2,472
<b>Rossaveal</b>	<b>5,691</b>	<b>5,891</b>	<b>6,185</b>	<b>6,519</b>	<b>6,465</b>
<b>State</b>	<b>3,525,719</b>	<b>3,626,087</b>	<b>4,239,318</b>	<b>4,588,252</b>	<b>4,761,865</b>

Source: CSO

## 2.1.3 Relative Affluence and Deprivation

The Rossaveel Harbour Area is considerably more disadvantaged than the West region or the country as a whole. In 1991, the Relative HP Index score for the Rossaveel Harbour Area was -9.0, indicating that this is a disadvantaged area by national comparison. Despite a significant improvement of 2.6 points over the 10-year period, the Index score in 2016 was -6.4, which would still classify as comparatively deprived. It is also worth noting that of the four EDs which make up the Rossaveel Harbour Area, Sailearna is slightly less disadvantaged, whilst the other three EDs show signs of even greater weakness than Sailearna.

**Table 2.2: Ros an Mhíl Geographical Area Relative Affluence and Deprivation**

	2006	2011	2016
<b>Inishmore</b>	-10.0	-6.0	-7.9
<b>Kilcummin</b>	-12.4	-8.2	-7.7
<b>Selerna</b>	-2.6	-2.5	-1.4
<b>Crumpaun</b>	-10.2	-7.9	-8.8
<b>Rossaveel</b>	-9.0	-6.0	-6.4
<b>West</b>	-1.0	-0.3	-0.4
<b>State</b>	-0.4	<b>0.2</b>	<b>0.6</b>

Source: Haase and Engling

## 2.2 Governance of Rossaveel Fishery Harbour Centre

Rossaveel is one of the state's Fishery Harbour Centres operated by the Department of Agriculture, Food and the Marine.

The other five Fishery Harbour Centres are: -

- Howth, Co. Dublin
- Dunmore East, Co. Waterford
- Castletownbere, Co. Cork
- An Daingean (Dingle), Co. Kerry
- Killybegs, Co Donegal

These harbours are managed and operated in accordance with the Fishery Harbour Centres Acts 1968 (as amended). This Act provides for the establishment and operation of these harbours to promote, develop and carry on sea fishing, fish processing, fish related activities and matters connected with the fish industry as well as any other purpose, including the provision, improvement and development of leisure or amenity facilities or for facilitating or promoting the social or economic development of the area in which the Fishery Harbour Centre is located.

The 1968 Act was amended in 1998 to broaden how properties owned by the State could be used. Section 5 defines the scope of use for which Fishery Harbour Centres can be put to. While the Section states that *'the facilities can be used for facilitating or promoting the social or economic development of the area in which the Fishery Harbour Centre is located, which the Minister considers advantageous and appropriate in respect of the operation or development of the Fishery Harbour Centre'*, it could be strengthened to confirm that FHCs can be used for the support of offshore windfarms.

The Harbours are managed via a statutory fund, known as the Fishery Harbour Centres' Fund, which the Comptroller & Auditor General audits on an annual basis. The Fishery Harbour Centre Management Committee has overall responsibility for the management of the Fishery Harbour Centres. This committee is made of an Assistant Secretary General and the Heads of Divisions for the Sea Food Administration Division (SFAD), Marine Engineering Division (MED) and Accounts Divisions. SFAD and MED are jointly charged with the day to day management of the harbours with SFAD responsible for financial management of the harbours including the Fishery Harbour Centres' Fund, the Capital Programme and the property portfolio and MED responsible for operations, HR, Health and Safety and implementation of the Capital Programme.

## 2.3 Staffing

The Rossaveel Fishery Harbour Centre has a Full-Time-Equivalent staffing of 10 as follows:

- Harbour Master and deputy Harbour Master
- Harbour Engineer
- Foreman, craft and general operatives
- Receptionist

About 18 local fishing boats including up to six pelagic vessels, operate out of Rossaveel; these numbers grow to some 35 with vessels from the East Coast when the Porcupine Basin season (September to June).

## 2.4 Financial Performance

Irish fishing boats pay annual Harbour Dues based on tonnage. In addition, they pay goods due based on the volume of catch. These details can be found in S.I. No. 214 of 2012, Fishery Harbour Centres (Rates and Charges) Order 2012.

Rates are under review at present and are expected to undergo public consultation in the near term. It is likely that the charges will be adjusted, at a minimum, in line with inflation.

The most recent financial data available for the Rossaveel Fishery Harbour Centre is for the year ending 31 December 2015. *The Accounts are prepared in accordance with the relevant legislation include Receipts & Payments Accounts as well as an Income & Expenditure Account. Depreciation does not feature in any of these Harbour Accounts.*

The financial performance of Rossaveel on an Income and Expenditure basis is as follows:

**Table 2.3: Rossaveel Fishery Harbour Centre Income & Expenditure for the year ended 31 December (€000)**

**Extract from Audited Financial Statements**

	2017	2018	2019
	€	€	€
<b>Income</b>			
Harbour Dues	111	293	258
Rents	57	57	73
Sundry Receipts	13	4	3
Sale of Assets	0	0	19
	<b>181</b>	<b>354</b>	<b>353</b>
<b>Expenditure</b>			
Salaries & Wages	295	318	362
Light, Heat & Power	39	53	43
Maintenance	86	40	51
Telephone	2	2	2
Water Rates	3	17	20
Sundry Expenses	24	25	111
Bad Debt Expense	47	1	3
Bad Debt Provision	76	59	23
Depreciation		<b>23</b>	<b>27</b>
	<b>420</b>	<b>538</b>	<b>642</b>
<b>Surplus/(Deficit)</b>	<b>(239)</b>	<b>(184)</b>	<b>(259)</b>
<b>Opening Balance</b>	<b>(2,279)</b>	<b>(2,517)</b>	<b>(2,701)</b>
<b>Closing Balance</b>	<b>(2,517)</b>	<b>(2,701)</b>	<b>(2,990)</b>

*Source: Department of Agriculture, Food and the Marine*

## 2.5 Fisheries Infrastructure

The photo below shows the location of the principal facilities, namely

- Pier 1, 120m long with a water depth of 3.7 metres.
- Pier 2, 313 metres long with the part beyond the Ice Plant some 5.5 metre deep
- the Sean Ceibh wharf at the eastern side of No 2 Quay, 70 metres long, where the cargo vessels generally tie up (Rossaveel Port Services, Lasta Mara Teo)
- Galway and Aran Co-op / Auction Hall,
- Harbour Office,
- Ferry Boarding Facilities,

- (6) Sea Angling / Charter Boat Boarding Facilities, These three pontoons handle the ferry boats to the Aran Islands (Aran Island Ferries). The Doolin Ferries vessels tie up there during the winter months.
- Iasc Mara Teo – now out of voluntary liquidation with plant and equipment still in place
- Small Craft Harbour (160 berth marina to grow to 240 berths),
- Car Park,
- BIM Ice Plant,
- Ferry Offices,
- Old Auction Hall.
- Marina

**Figure 2.2: Locations of Key Infrastructure**



## 2.6 Landings

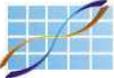
### 2.6.1 National

Table 2.5 presents details of Irish and foreign landings at the six Fishery Harbour Centres for the period 2013 – 2019 as well as the total for the state.

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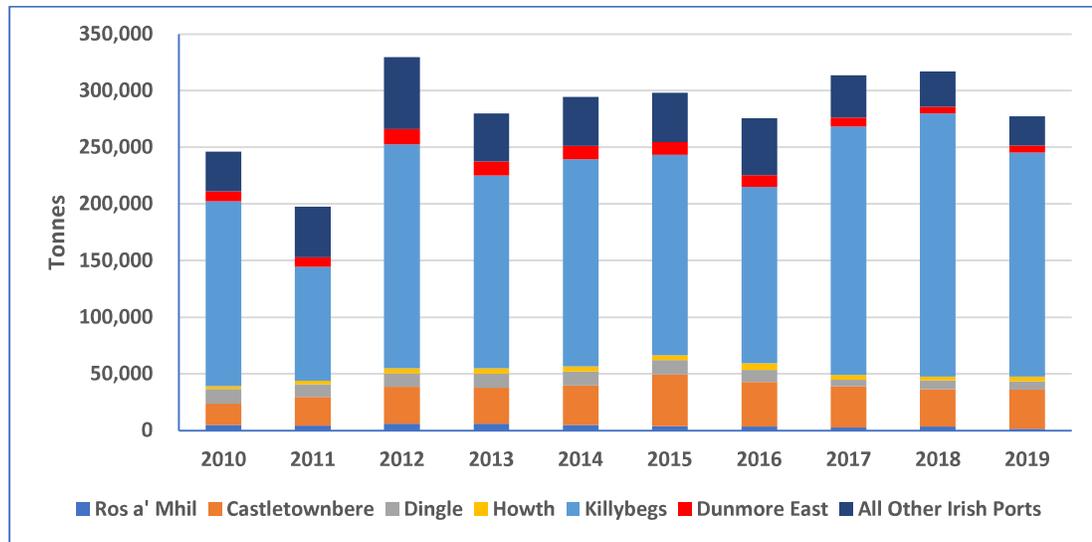
Appendix 6 shows Fishing Activity in Irish EEZ based on VMS for various days during the year by nationality of boat owner. It shows that, at certain times of the year, there is significant fishing activity off the west coast.

**Table 2.8: Total Irish and Foreign Fish Landings by FHC (2013– 2019)**

	2013	2014	2015	2016	2017	2018	2019
<b>Ros a' Mhil</b>	5,795	4,770	3,637	3,391	2,744	3,526	1,429
<b>Castletownbere</b>	32,105	35,004	45,762	39,562	36,221	32,811	34,540
<b>Dingle</b>	12,123	12,221	12,610	10,454	5,645	7,715	7,386
<b>Howth</b>	5,054	4,482	4,411	5,997	4,331	3,551	4,181
<b>Killybegs</b>	170,139	183,052	177,036	155,535	219,346	232,228	197,760
<b>Dunmore East</b>	11,994	11,534	10,978	10,387	7,942	5,784	6,430
<b>All Other Irish Ports</b>	42,658	43,318	43,698	50,305	37,575	31,237	25,583
<b>TOTAL</b>	<b>279,868</b>	<b>294,381</b>	<b>298,132</b>	<b>275,631</b>	<b>313,804</b>	<b>316,852</b>	<b>277,309</b>

Source: CSO, Fish Landings (Live Weight Equivalent)

**Fig 2.3: Fish Landings by FHC (2010– 2019)**



Source: CSO, Fish Landings

## 2.6.2 Catch by Species

Table 2.7 details the catch by species for Rossaveel for 2017 – 2020 as published by the SFPA.

Table 2.8 relates the tonnage and value of catch between Rossaveel FHC and for Ireland in 2020.

**Table 2.7: Fish Catch by Species for Rossaveel FHC (2017– 2020)**

Species	2017		2018		2019		2020	
	Tonnes	€	Tonnes	€	Tonnes	€	Tonnes	€
<b>Irish Landings</b>								
Demersal	546	1,449,167	465	1,235,053	466	1,199,458	650	1,522,624
Pelagic	974	589,578	1,494	1,275,095	11	10,459	1,410	732,207
Shellfish	1,149	8,934,924	1,356	12,028,848	775	7,235,405	746	7,368,443
Deepwater	0.2	110	0.4	416.0	0	0	2	3,276
<b>Total</b>	<b>2,669</b>	<b>10,973,779</b>	<b>3,315</b>	<b>14,539,412</b>	<b>1,252</b>	<b>8,445,322</b>	<b>2,809</b>	<b>9,626,550</b>
<b>Foreign Landings</b>								
Demersal	5	16,416	32	112,011	32	111,817	33	110,897
Pelagic	0	0	0	0	0	0	0	0
Shellfish	70	481,828	178	1,380,300	149	1,081,765	215	1,369,599
Deepwater	0	0	0	0	0	0	0	0
<b>Total</b>	<b>75</b>	<b>498,244</b>	<b>210</b>	<b>1,492,311</b>	<b>181</b>	<b>1,193,582</b>	<b>248</b>	<b>1,480,496</b>
<b>All Landings</b>								
Demersal	551	1,465,583	497	1,347,064	498	1,311,275	683	1,633,521
Pelagic	974	589,578	1,494	1,275,095	11	10,459	1,410	732,207
Shellfish	1,219	9,416,752	1,534	13,409,148	924	8,317,170	961	8,738,042
Deepwater	0.2	110.0	0.4	416.0	0	0	2	3,276
<b>Total</b>	<b>2,744</b>	<b>11,472,023</b>	<b>3,525</b>	<b>16,031,723</b>	<b>1,433</b>	<b>9,638,904</b>	<b>3,057</b>	<b>11,107,046</b>

Source: SFPA

**Table 2.8: Fish Catch by Species for Rossaveel FHC and All Irish Ports (2020)**

Species	2020					
	Rossaveel		Ireland		Ratio	
	Tonnes	€	Tonnes	€	Tonnes	€
Demersal	683	1,633,521	49,663	132,322,695	1%	1%
Pelagic	1,410	732,207	252,601	111,998,313	1%	1%
Shellfish	961	8,738,042	24,888	101,497,069	4%	9%
Deepwater	2	3,276	622	961,677	0.3%	0.3%
<b>Total</b>	<b>3,057</b>	<b>11,107,046</b>	<b>327,773</b>	<b>346,779,753</b>	<b>1%</b>	<b>3%</b>

Source: SFPA

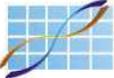
Fig 2.4: Vessels at Rest at Rossaveel Fishery Harbour Centre



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## 2.7 Facilities

### 2.7.1 Quays

The harbour has a number of quays.

- The Ferry quay which is 98 metres long
- The No.2 quay which is 215 metres long
- The Old Auction Hall (No 1) pier which is 125 metres in length
- The Sean Cheibhe (old granite pier), which dries out, located between No.2 pier and the passenger ferry berths, which is 70 metres long

With an access channel of 7 metres, the water depth is typically 3.7 metres, with one deepwater berth of 5.8 metres on the No.2 quay. There is a slipway located on the old quay.

### 2.7.2 Auction Hall

The Auction Hall is managed by the Galway and Aran Fishermen's Co-Op. and sells mainly whitefish, shellfish and a small amount of pelagic fish. It is a new modern building located close to the Harbourmasters office. The old auction hall is used to store nets and other fishing gear.

### 2.7.3 Properties

The harbour administration block, which contains the Harbour Master's Office, the SFPA Offices and the Marine Institute Office and Laboratory are owned by the Department. The ferry offices, which are located on a site owned by the harbour centre, were built by Tourism Chonnamara agus Árinn.

A building housing the Coast Guard Station, Department Engineers' store and a store/workshop for the Harbour Master is located on a site owned by the harbour centre. There is a helicopter pad operated by The Commissioners of Irish Lights; the site which is owned by the harbour centre and a car park with spaces for 300 cars, is also owned by the harbour centre.

### 2.7.4 Ice Plant

BIM has an Ice Plant on a site at No 2 pier leased from the FHC at Rossaveel

### 2.7.5 Marina

There is a 160 berth marina with toilets, showers and other amenities within

the harbour area. This is planned to grow to 250 berths.

### 2.7.6 Charter Island

This company, located within the estate, offers yacht charter, training courses and trips to the Aran Islands.

### 2.7.7 Iasc Mara Teo

There has been a fish processing operation in Rossaveal since the late 1960's. Herring processing commenced in the mid-seventies and by 1980 the Rossaveal plant became the largest processor of herring in Ireland and one of the leading marinating companies in Europe; as well as being the first supplier of herring roe processed in Ireland to the Japanese market.

Iasc Mara Teo was founded in 1992 by the Directors, Cathal Groomell and Tom Kane. They diversified the range of pelagic species processed to include mackerel, horse mackerel and sprat and also processed prawns during the summer period. IMT was the only processor of pelagic fish between Donegal and Kerry and until the time operations ceased in 2018 it was the natural destination for fish landed in Rossaveal.

Over the period from 1985 until 2017 the supply of herring and mackerel reduced significantly. As a result, employment at the factory has reduced significantly as follows:

	<b>Full-Time</b>	<b>Seasonal</b>
1985	60	340
1995	40	160
2005	15	40
2017	12	18

The company traded successfully from 1992 until 2015 with an annual turnover of approximately, €5 million. On average the company processed approx. 7,000 Mt of pelagic species per annum. In 2017 the company processed 1,200 Mt Mackerel and 1,000 Mt herring.

With the deterioration in supply, the financial performance of the company also suffered. In 2017 the turnover was €2.9 million. The herring quotas were significantly reduced for 2018 and the four pelagic boats from the local Galway and Aran Fisherman's Co-Op were either bought out or contracted by competitors based in Killybegs. After exhausting all avenues to find a solution

to the supply problem, the company was forced to take the decision to cease operations in April 2018

Iasc Mara Teo specialised in processing pelagic species, in particular mackerel and herring. The company had been in business on a 3.5 acre site since 1992.

“The factory has modern processing, freezing and cold storage facilities and it is hoped to find a buyer that will continue to operate it as a fish processing facility,” the company said.

The Company is now out of receivership.

The context of the closure can be found in the opening Statement to the Joint Oireachtas Committee on Agriculture, Food and the Marine on Tuesday 4th April 2017, when the Company noted that

*“there were 12 registered pelagic processing factories in the country - eight in County Donegal and one each in Rossaveal, Baltimore, Dingle and Castletownbere. These factories mainly process mackerel, herring, horse mackerel, sprat and blue whiting.*

*There are 50 boats in the fleet with a pelagic quota entitlement. There are 23 in the refrigerated sea water, RSW, sector which are currently allocated 87% of the mackerel quota. A total of 21 of the 23 are Killybegs based. There are 27 boats in the polyvalent fleet, based mainly on the south coast. They are allocated the remaining 13% of the mackerel quota.*

*Large Killybegs based companies which already control much of the quota are actively encouraging fishermen whose boats have licences with a pelagic quota entitlement to sell their boats, offering prices well in excess of their economic value. This trend has serious implications for fishing ports in the south and west. In Rossaveal three boats have been sold to Killybegs based companies in the past year. These boats were the main suppliers to Iasc Mara Teoranta for decades and accounted for over 60% of the fish supply to the factory. The reported prices paid for the boats were €5 million, €6 million and €8 million. Of these prices about 20% relates to the actual cost of the boats and 80% to the licences and the pelagic quota entitlements. All of the fish from them is now processed in Killybegs or outside the country. This has put the future of Iasc Mara Teoranta in jeopardy. It is also a major blow to the local fisherman’s co-op that handled their fish and all of the service providers and small businesses in the Rossaveal area. In total, five Rossaveal based boats have been bought by companies in Killybegs in recent years. There are now no active pelagic boats based in Rossaveal.”*

### 2.7.8 The Galway & Aran Fisherman's Co-op

The Galway & Aran Fisherman's Co-op is located in Rossaveal Harbour, County Galway. The co-operative consists of a fleet of twelve fishing vessels as well as a number of smaller fishing vessels.

The Galway & Aran co-op auctions mostly sea prawns to Italy, Spain and Irish wholesalers in a new modern building located close to the Harbourmaster's office.

### 2.7.9 Ferry Services from Rosaveel

Aran Island Ferries offer daily services from Rossaveel to the three Aran Islands.

They operate from dedicated berths.

**Fig 2.5: Aran Islands Ferry arriving from Inis Oirr**



### 2.7.10 Cargo Services from Rosaveel

Lasta Mara Teo<sup>8</sup> commenced cargo ferry services to the Aran Islands in 1999 and was set up to facilitate utility and heavy cargo services to the Western Islands. Since the 1st January 2005 Lasta Mara Teo has operated the cargo contract to the three Aran Islands Inis Mor, Inis Meain and Inis Oirr. The vessel MV Blath na Mara is the main cargo vessel to the Aran Islands.

<sup>8</sup> <https://www.lastamarateo.com/index4.html>  
2<sup>nd</sup> Dec 22

All food stuffs chill and frozen, all household goods, furniture, coal, cars, transit vans, tractors, horses and all types of livestock are carried on Blath na Mara. Chill and frozen facilities are provided in the warehouse and on the vessel. A 'roll on roll off' service is provided by the vessel MV Chateau Thierry for heavy goods machinery from Rossaveal, i.e. Trucks, Diggers and heavy plant and machinery.

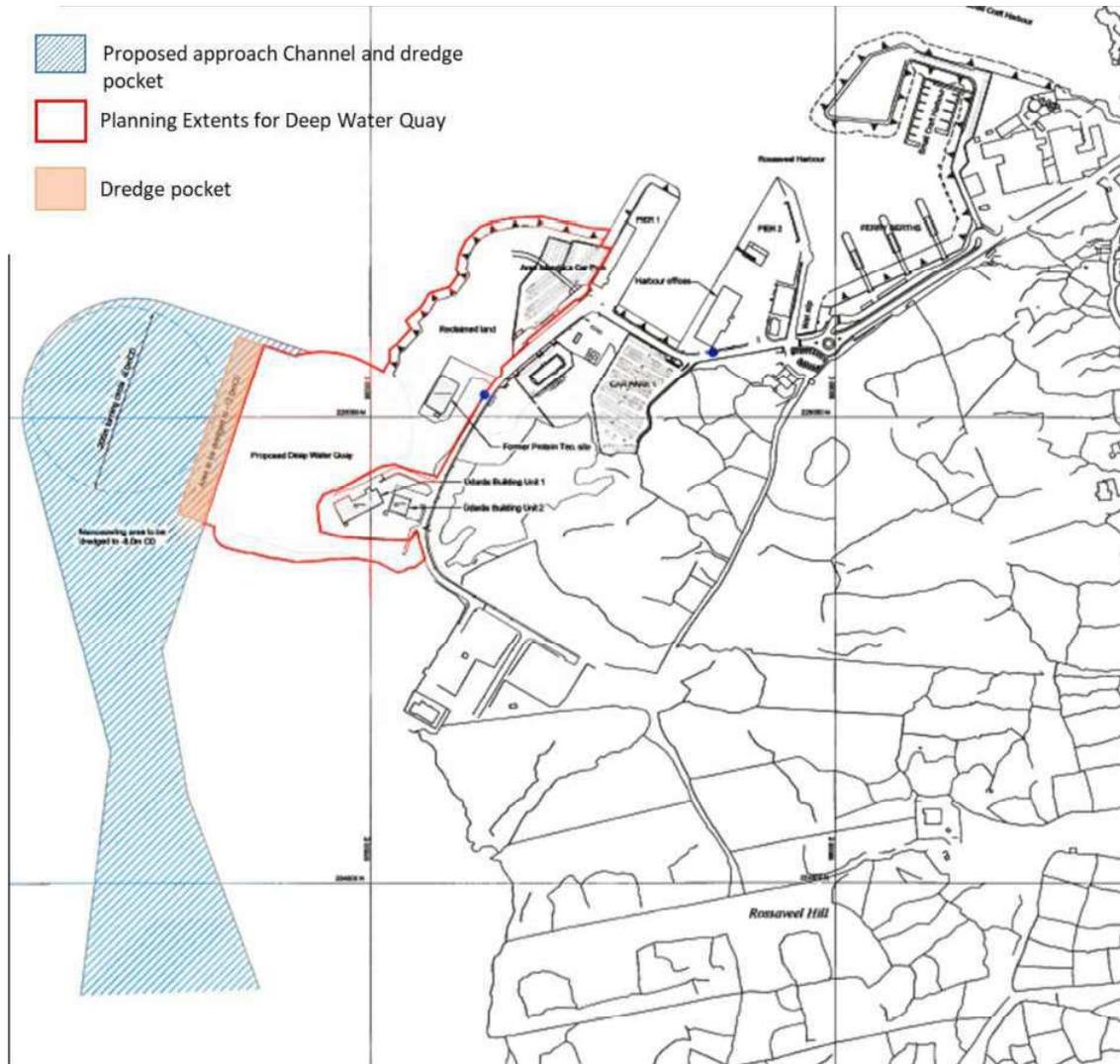
**Fig 2.6: Lasta Mara Teo Vessels**



### 3. The Proposed Development

In this Chapter, we outline the deep water development as proposed by Mott Macdonald and the findings of the peer review carried out by GDG.

**Fig 3.1: Location of the proposed Deep Water Quay**



#### 3.1 The Original Proposal<sup>9</sup>

The existing harbour at Rossaveel is constrained as no deep water facilities are currently available for larger vessels. Modern fishing vessels continue to increase in size as the industry trends towards larger and more sophisticated boats, and Rossaveel

<sup>9</sup> EIS Non-Technical Summary: Rossaveel Harbour: Deep Water Quay Development; Dept of Agriculture, Food and Marine, June 2017  
2<sup>nd</sup> Dec 22

Harbour is increasingly unable to serve these larger vessels. In order to address this, a new deep water quay is being considered that will enable the harbour to accommodate these larger fishing vessels. The quay will help facilitate the development of opportunities in the fishing sector which in turn will support the continued operation and sustainable development of Rossaveel Harbour.

Government policy in Ireland in relation to the fisheries industry is to improve Irish harbour infrastructure and to attract more large foreign fishing vessels into Irish harbours to land their catches.

The quay will provide 200m of outside berthing frontage which, along with associated dredging works, will make Rossaveel Harbour a viable location for increased fish landings, particularly by larger Irish and foreign vessels. To facilitate berthing by these vessels, a 30m wide x 200m long pocket directly adjacent to the quay will be dredged to a depth of -12m Chart Datum (mCD). In addition, a vessel approach corridor of approximately 600m length and a vessel turning circle of 200m diameter will be dredged to a depth of -8m mCD. A reclamation area will also be constructed directly behind the quay which will link to the existing onshore components of Rossaveel Harbour. Rossaveel has significant strengths which would make it an attractive location for increased fish landings, particularly by larger Irish and foreign vessels. These strengths include:

- Close proximity to the main fishing grounds off the Irish west coast, meaning short steaming times for vessels;
- Connectivity via motorway network to Dublin and on to Rosslare, which would enable trucks to speedily transport fish exports across to Irish ferry ports; and
- Substantial excess capacity in existing fish processing facilities at Rossaveel.

The deep water quay would have a significant impact on local businesses. For example, Iasc Mara Teoranta estimates that the quay would attract fish landings which would increase sales value by 60%–100%, with the majority going to the export market. Employment would be expected to rise by 20-25 staff during the busy season. Moreover, the busy season would be extended by a further two months due to landings of blue whiting, and this would maintain a workforce of 50-60 staff for nine months of the year. However, should the status quo continue in Rossaveel Harbour (i.e. no deep water quay), IMT have stated that its ability to survive commercially would be undermined and that it would likely close in a matter of years, with a resultant loss of output and employment for the local economy.

Likewise, Údarás na Gaeltachta has advised that the deep water quay would be strategically essential for the South Connemara Gaeltacht in generating economic activity for a peripheral region. Údarás has vacant buildings and land available for

development in Rossaveel Harbour, and has indicated that its overall agenda for the region would be advanced by the quay.

In addition, Coiste Tacaíochta Chalafoirt Ros a' Mhil (an Coiste), a committee with representatives from the community and local businesses in the Rossaveel area, has conducted a high-level economic impact assessment which indicated that significant job creation and economic multipliers would arise from the development of a deep water quay at Rossaveel Harbour.

### 3.2 Alternative Design Options

As an alternative to the Mott MacDonald design, GDG has presented three main alternative design solutions for the deep-water quay and suggested some variations in depth for proposed dredging areas with the intention of reducing the overall cost of construction whilst maintaining scheme functionality. Four different types of retaining structures have been proposed for the quay wall along with a subset variation in the bedrock profiles, to improve the efficiency of the design. Options considered include caissons, an “L” wall type proprietary system, a mass concrete retaining wall and also a Ruukki piled retaining wall involving the drilling of relatively small diameter tubular piles connected immediately adjacent to one another. Within a number of the designs, the finished bedrock profile has been altered in order to reduce the rock blasting and dredging required attributing to high costs.

#### 3.2.1 Costs of Options and Savings

The total costs of each option are provided in Table 4.1 below. It should be noted that these design options are based on a turning circle diameter of 200m and with an adjacent berth slot depth of -12.0m CD. Cost savings between the new alternative design options and the original design and associated cost estimate is also presented.

**Table 3.1: Comparison of Cost Saving Estimates for all Design Options**

Design Option	Description	Total Cost	Cost Saving relative to original Mott MacDonald design, 2017
1	Steepening Rock profile based on the original design	€29,293,572.50	-€82,335.00 (cost increase)
2A	Rock ledge profile & smaller caisson units.	€21,304,182.90	€7,907,054.60
2B	Rock ledge profile & “L” Wall structure	€21,090,720.50	€8,120,517.00
2C	Rock ledge profile & mass concrete retaining wall	€18,973,220.50	€10,238,017.00
3	Ruukki Pile type retaining wall	€21,006,705.50	€8,204,532.00

Each of the alternative design options considered provide the functional requirement for the structure while saving on the overall cost of dredging and constructing the quay wall in various ways.

Option 1 provides the least savings of the alternative designs considered – and is in fact a small increase due to the potential variation discovered in rock head levels. It maintains the originally proposed structure by using the caisson with no changes to the dimensions and properties. The design remains technically feasible for its required usage with cost saving due to the reduction of rock blasting and rock dredging of the natural bedrock profile (although the overall rock profile has been updated based on the latest geophysical survey). Option 1 thus provides a cost increase estimate of €82,000.

Option 2A provides a cost saving estimate of €7,907,000. The design remains technically feasible by adopting the same principles as in terms of using caisson structures to form the main quay wall but with reduced height due to the bedrock ledge profile. To obtain this profile more detailed and advanced methods of blasting and dredging are required. The slope from the foundation of the caisson structure to full depth of the dredge pocket will remain as close to vertical as possible. From a technical point of view, a wider fender along the face of the quay will likely be required to ensure that any vessel that is berthing alongside the quay maintains clearance from the slope face. This can be addressed through projecting brackets or concrete outstand elements, helping to increase the overhang distance along the quay and effectively offset the berthing line slightly seaward.

Option 2B offers a cost saving in the order of €8,120,000. This design uses an alternative “L” wall type structure compared to the box caissons. The structure maintains the functional requirements of the quay wall but is achieved through a different construction form. Similarly, to the caisson option, all panels for the “L” walls are cast and cured on site. The majority of the cost savings within this design option comes from the reduction in concrete volume and reinforcement needed to produce the structure. The thickness of the walls is significantly reduced due to the supports and the interlocking panels between each “L” shape unit.

The Option 2B concept design also uses the bedrock ledge profile to reduce the total volume of material requiring blasting and dredging. This Option 2B design will also require the use of a wider fender or outstand wall to ensure that any vessel can berth safely along the length of the quay and avoid the rock slope. The proposed use of the “L” wall comes from similar successful

installations of the structures in projects reported from Finland. In Finland there are similar geological ground conditions to that of Rossaveel where there are extensive areas of hard rock such as granite, along with the need for significant water depths and drafts. This alternative design is also based on its use elsewhere for achieving similar retained heights as presented.

Option 2C potentially offers the most cost saving in the order of €10,238,000. This design uses an insitu concrete pillar caisson as the main cell with alternating rockfilled (or partially concrete filled) cells between. This type of structure was previously used in Castletownbere to provide a robust concrete face without fendering

Option 3 has a cost saving in the order of €8,204,000. This design uses a fully drilled Ruukki piled system to advance the interlocking steel tubes into the rock and avoids the necessity of dredging in advance. One considerable advantage over any Option2 is the negated risk of an unsatisfactory rock ledge/plinth or sufficiently stable rock slope being created. The creation of the rock ledge may be seen as a particular risk given the uncertainties of the rock properties at this stage.

A further refinement of the dredging volumes and associated options costs was developed in conjunction with DAFM in Q1 2020 (as discussed in Sections 5.5 and 6.7), whereby a reduced turning circle diameter of 150m (from 200m) was considered in conjunction with potential reduction to the berth slot depth to -10.0m CD (from -12.0m CD) for Options 2A, 2B and 2C. Such measures were able to further reduce cost estimates to the extent shown in Table 4.2 below.

**Table 3-1 Cost Estimates from Cost Reduction Exercise in Q1 2020**

Design Option	Total Cost based on -12.0m CD berth slot and 200m dia. turning circle	Total Cost based on -12.0m CD berth slot and 150m dia. turning circle	Total Cost based on -10.0m CD berth slot and 150m dia. turning circle
1	€29,293,572.50	N/A	N/A
2A	€21,304,182.90	€20,398,497.90	€19,022,667.90
2B	€21,090,720.50	€20,185,035.50	€18,809,205.50
2C	€18,973,220.50	€18,067,535.50	€16,691,705.50
3	€21,006,705.50	N/A	N/A

As demonstrated, there is a relative cost saving of approximately €906k from reducing the turning circle diameter from 200m to 150m and maintaining a berth slot depth of -12.0m CD, and a further cost saving of €1,376k from raising the level of the berth slot from -12.0m CD to -10.0m CD and maintaining the turning circle diameter at 150m.

### 3.2.2 Summary of Recommendations and Conclusions from Original Report

The points below summarise the recommendations and conclusions considered by GDG within the alternative designs proposed.

- There have been five alternative design solutions considered; Options 1, 2A, 2B, 2C and 3, each with their relative merits. The options have been advanced at a conceptual level. In order to progress with a preferred design option, we would recommend that this body of work is further advanced through preliminary and detailed design studies. At the preliminary design stage, a more detailed cost estimate accompanied by a set of preliminary design drawings should be provided.
- Option 1 maintains the use of the same caisson structure but involves the steepening of the rock slopes at the back of the caisson. The rock slopes should be more stable than assumed in the original design allowing for this increase. This has been based on the strength of the rock that has been proven through rock testing, leading to the same design change allowing saving in all three alternative designs.
- Due to the relative difference in rock levels between surveys, using the updated dredge volume estimates, it is estimated that there is a marginal cost increase of €82,000 for Option 1, when compared to the originally proposed caisson design by Mott MacDonald.
- In order to create the large base required for the placing the caisson large amounts of rock blasting and rock dredging with depth was deemed to be required. A potential alternative to this, to limit the blasting and rock dredging required, is to create a stepped bedrock ledge at a depth where bedrock is strong enough for bearing capacity of the retaining structure and sufficiently competent for a steep graded slope down to the dredged depth of -12mCD. This solution was carried through design alternatives Options 2A, 2B and 2C.
- This ledge/plinth, in combination with potential to reduce the proposed dredge depth in the navigation channel from -8.0m CD to -7.0m CD could reduce circa 70,000m<sup>3</sup> of rock and 10,000m<sup>3</sup> of overburden compared to the original design.
- Option 2A adopts the rock ledge profile along with a caisson unit of consequently lesser retained height. The stability of the reduced height caisson has been proven through the design calculation completed.
- The approximate cost saving estimate for design Option 2A is €7,900,000 compared to the originally proposed caisson design by Mott MacDonald.
- Option 2B adopts the rock ledge profile along with a “L” wall retaining units with interlocking panels, that is filled behind the quay wall.
- The approximate cost saving estimate for design Option 2B is €8,120,517.00 compared to the originally proposed caisson design by Mott MacDonald.
- The structural stability of the “L” wall system has been considered as suitable based on precedence where the retained height and geological ground conditions are similar to that of Rossaveel. However, this design alternative needs further detailed design and structural checks in discussion with Boskalis if to be carried forward as a viable solution.
- In terms of installing the “L” wall panels and interlocking units, the maximum dry weight of the 12m height panel is 265 Tonnes and therefore

it may be more suited to contractors with access to large scale marine plant capable of lifts greater than this weight.

- The assumptions associated with the cost saving assessment of design alternative Option 2B include the following:
  - The use of a 12m retained height structure with the possibility of extending this height. Comparably, to the caisson structures, a cope beam/services trench is used to make up the level difference from the top of the retaining structure to the finished proposed deck level.
  - The casting yard used for the “L” wall units and interlocking panels will be situated on land for casting, curing and installation.
- Option 2C adopts the same rock ledge profile but utilises concrete pillars with infilled cells between, essentially providing alternative forms of wall than the caisson and “L” wall systems. This option is estimated to provide the greatest cost saving from those considered, with up to €10,238,000 cost saving, equivalent to an overall cost in the order of €18,973,000.
- Option 3 utilises a Ruukki retaining wall system which effectively requires no dredging behind the quay line, allowing for piles to be installed directly into the rock in order to form the quay wall. This option provides the greatest cost savings in terms of dredging, but is offset relative to other alternative due to significant civils construction costs. The overall cost saving from this option is approximately €8,205,000 relative to the original cost estimate.
- A further cost refinement exercise was undertaken in Q1 2020 on Options 2A, 2B and 2C to examine the cost savings associated with amendments to the turning circle diameter and to the berth slot depth. It was found that there is a relative cost saving of approximately €906k from reducing the turning circle diameter originally from 200m to 150m and maintaining a berth slot depth of -12.0m CD, and a further cost saving of €1,376k from raising the level of the berth slot originally from -12.0m CD to -10.0m CD and maintaining the turning circle diameter at 150m. When both cost saving measures were applied, the range of costs of these options was found to vary from €16,692,000 for Option 2C, to €19,023,000 for Option 2A.

### 3.2.3 Numerical Modelling Report

Subsequently, GDG was commissioned to undertake a Numerical Modelling Report.

The report first details a wind analysis at the site using numerically generated data and based on the output of this analysis two types of numerical models were setup and run. The first numerical model determined the magnitudes of locally generated wind waves at the site whilst the second examined in detail the interaction of these waves with the proposed deepwater quay structure. The outcome of the modelling led to a re-examination of the nature of the quay seaward face such that to mitigate against potential negative impacts.

It builds on previous studies and design work and addresses specific issues that have arisen in relation to the potential impacts of locally generated waves incident on the

proposed quay.

The primary issue associated with this study has been the use of a vertical face on the proposed deepwater quay. Locally generated waves are most critical with respect to this and the work examined and quantified the frequency of occurrence and impacts of these waves. It was determined that on a vertical face quay face the incident wave heights can be more than doubled in terms of their propagation in front of the quay. Although the 0.5m wave heights that were simulated only occur approximately once per year at the site it would be expected that if the vertical face was used then lower incident waves could also cause operational issues. The model output demonstrated that an open face design with a revetment could solve such operational issues with respect to reflected waves.

However, it needs to be decided, based on the frequency of occurrence of winds that give rise to adverse conditions whether the additional expense associated with the open face design is justified

The model output also showed that variations in relation to the bed levels associated with the access channel and turning circle do not influence the wave characteristics. Therefore, there is no restriction in relation to which should be selected for the final design.

The 2021 cost of Option 4, the Open Piled Quay Wall, is as follows and was used in the socio-economic analysis undertaken.

Key Element of Works	Description	Estimated Costs €m
Dredging	Rock and overburden dredging incl. rock slope formation and material re-use and handling	€6.3
Quay Wall Structures	Open-piled construction incl. mobilisation, both drilled tubular piling and sheet piling works	€10.2
Concrete Elements	Reinforced concrete quay slab, concrete pavement and vertical boundary walls	€3.1
Reclamation Fill	Imported rockfill, rock armour revetments and Clause 804 for access road	€5.4
Ancillary Civils Works	Various items incl. drainage, services, perimeter fencing, high mast lighting and marine fendering	€0.8
<b>TOTAL COSTS</b>		<b>€25.6</b>

Appendix 2 contains the Open Piled Quay Wall Concept Appraisal and Cost Estimate Assumptions drawn from the GDG Numerical Modelling Report.

## 4. Cost Benefit Analysis

In this Chapter, we present an outline Cost Benefit Analysis (CBA) of the proposed development in terms of Net Present Value (NPV), Internal Rate of Return (IRR) and Benefit/Cost Ratio.

CBA is the mandatory appraisal technique for projects costing more than €20m.

To address uncertainty in relation to fish landing projections and to establish the minimum volumes that were necessary to ensure the socio-economic viability of the proposed development, a highly conservative approach to forecasting was adopted.

It should be noted that no account was taken of fish landings that would have occurred that did not require the development to proceed.

### 4.1 General Approach

The general approach to carrying out this CBA is set out in Circular 13/13 of the Department of Public Expenditure and Reform: *The Public Spending Code: Expenditure Planning, Appraisal & Evaluation in the Irish Public Service - Standard Rules & Procedures*. CBA is an analysis tool used generally for projects seeking public funding, and attempts to identify the net socioeconomic benefit of a project.

Three forms of evaluation have been prepared:

- Financial
- Exchequer
- Economic

In all cases,

- As noted above, the projections were prepared on a prudent conservative basis over a 20 year horizon
- The financial projections are presented in constant prices, ie, inflation is ignored
- It is assumed that there are no displacement effects, ie, no developments at other Irish fishery harbours, eg Killybegs, will impact on landings at Rossaveel, and that developments (or non-developments) at Rossaveel will impact any other harbour company

It should be noted that the analysis is constrained by the commercial confidentiality of the fishing and fish processing sector and various assumptions, therefore, have had to be made based on conversations held with some of the local stakeholders. In a number of cases, averages have been used and estimates made.

VAT has been assumed to be neutral; while the capital costs of the development will attract VAT, there will be VAT payments back to the Exchequer from the VAT payments of builders and suppliers.

No account is taken of any processing in foreign owned processors or other Irish processors in the economic analysis other than the spend of foreign calls in Rossaveel.

Tables 4.1(a) and 4.1(b), later, provide detail of the Drivers of Development and Key Parameters used in the CBA calculations.

Appendix 1 is a print-out of the Cost Benefit Analysis of the Core Option.

#### 4.1.1 Financial Appraisal

General Financial Appraisal is a method used to evaluate the viability of a project by assessing the value of net cash flows that result from its implementation.

There are at least two types of financial analysis which must be carried out for projects over €20m:

- A Financial Analysis from the perspective of the Sponsoring Agency
- An Exchequer cashflow analysis

The Financial Analysis looks at the impact of the project on the finances of the Sponsoring Agency, in this case, the Department of Agriculture, Food and the Marine, while the Exchequer Analysis is concerned with the impact of the project on the Exchequer.

Financial analysis focuses on cash flows as opposed to economic flows and in particular considers sustainability and profitability. The financial analysis is one of the first steps in the overall appraisal stage because an understanding of the pattern of the cashflows is a critical building block for the overall business case as well as the CBA.

#### 4.1.2 Economic Appraisal

The net economic benefit consists of:

The **additional value-added** is made up of the additional income (profits + wages) generated by the project, and can be considered the private return to the resources (enterprise and labour) used in the project.

The **social opportunity cost of the resources used** represents the cost to society of using enterprise and labour resources on the project. It is effectively their value in the next best use, and is often referred to as the shadow price.

The Public Spending Code sets out the Shadow Price of Labour (SPL) for use in economic appraisals. The guidance provides that the appropriate range for the SPL is between 80 per cent and 100 per cent, and to be employed in

appraisal. A rate of 80 per cent has been adopted to reflect the precariousness of employment in the Gaeltacht area.

As Exchequer funds are used, a shadow price of 130 per cent is applied to account for the distortionary effect of the taxes used to generate them.

**External benefits** are those that affect third parties who are not charged for these benefits or compensated for these costs.

In the current context we include **wider economic benefits**, specifically the additional **Gross Value Added** or GVA generated by customers of the FHC, because they can increase their profitability or reduce their costs as a result of the proposed harbour development.

The most familiar **external costs** are time, fuel, non-fuel and pollution costs of fleet transport. However, as it is assumed that all catch will be processed in Rossaveel, these costs have been excluded.

While congestion may arise during the construction phase and subsequent operations, these costs have also been excluded.

The socioeconomic CBA takes the net cash flows from the financial appraisal, adjusts them to shadow prices (i.e. true economic prices) including a 30 per cent premium for the shadow price of public funds, and adds the wider economic benefits and the external costs to the calculation. It then applies a social discount rate of 4 per cent real.

The wider external benefits include the additional economic activity by the FHC's customers, eg, spend by foreign vessels and crew at Rossaveel and the added value generated by the fish catching and fish processing sectors.

In the case of Rossaveel Fishery Harbour Centre, it can be summarised as follows:

<b>Financial CBA</b>	<ul style="list-style-type: none"><li>• <b>The financial benefits minus financial costs of the project, from the point of view of Rossaveel FHC</b></li></ul>
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Economic CBA	<p><i>plus</i></p> <ul style="list-style-type: none"> <li>• <b>External and wider economic benefits</b></li> <li>• <b>Adjustments for the shadow price of Labour and public funds</b></li> </ul> <p><i>minus</i></p> <ul style="list-style-type: none"> <li>• <b>External costs</b></li> </ul>
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Put simply, the Financial Case evaluates the project from the point of view of Rossaveel FHC, while the CBA evaluates it from the point of view of society as a whole.

#### 4.1.3 Performance Metrics

The three performance metrics applied in Cost Benefit Analysis are:

**Net Present Value Method (NPV):** The Net Present Value (NPV) is the sum of the discounted cash flows over the period. This criterion is simply based on whether the sum of discounted benefits exceeds the sum of discounted costs.

**Benefit Cost Ratio (BCR):** This is the ratio of discounted benefits to discounted costs. If the benefit cost ratio is greater than one the project may be accepted as there are more benefits than costs. Generally a BCR of greater than 1:1 is an indicator that a proposal's benefits exceed the costs.

**Internal Rate of Return (IRR):** The internal rate of return is the maximum rate of interest that a project can afford to pay for the resources used which allows the project to cover the initial capital outlay and on-going costs and still break even. It can also be described as the discount rate that equates the present value of benefits and costs.

## 4.2 Rationale for the Project

The rationale for the Deep Water Berth is to facilitate existing and potential traffic using Rossaveel harbour that are currently impacted by the absence of deep water.

In addition, the current facilities at Rossaveel are not adequately or efficiently catering for existing traffic, with congestion, queuing and delays a regular occurrence particularly during the Porcupine Basin season.

**Fig 4.1: A Busy Harbour**



This limitation also impacts the number of potential visiting vessels that would come to Rossaveel to land their catch and grow the local fish processing sector.

Discussions with stakeholders, particularly the Harbour Development Ctte, suggest that providing a deep water berth would open up the harbour to additional business and attract more vessels to Rossaveel; however, what is uncertain is the nature of the business, the volumes and the extent that it would be additional rather than a displacement.

New businesses, both new landings and diversification, suggested include the Spanish fleet operating off the west coast that used to land fish in Rossaveel, cargo services and cruise vessels.

However, the most likely, relevant and certainly additional services relate to the offshore wind energy sector that we will consider later. The servicing of the Sceirde offshore windfarm requires a facility nearby and Rossaveel is ideally suited to provide this service and support.

A new deeper berth would address the delays suffered by certain existing large fishing vessels entering the harbour at low tide and the dangerous congestion that can arise when fleet from the east coast tie up during the porcupine basin season or during bad weather.

From a strictly CBA perspective, a CAPEX of €33.3m, after taking into account the

shadow price of capital of 130% and a Residual Value of €20m, requires an average annual net revenue of approximately €1.6m to break-even.

### 4.3 Offshore Energy

In recent times, the importance of servicing the offshore energy sector has become more pronounced and the Fishery Harbour at Rossaveel is considered an ideal location and of strategic importance as a base offering supporting facilities for such projects off the west coast because of its proximity to potential wind farms. Being some 40 kilometres west of Galway reduces steaming time to sites thus saving travel and fuel costs.

It also benefits from the available land alongside owned by Udraras na Gaeltachta for sub-assembly and other activities, as well as community support.

Both the IPORES<sup>10</sup> and Carbon Trust<sup>11</sup> Reports confirm that Rossaveel is suitable as an Operations & Maintenance facility location for instance.

The Marine Renewables Industry Association (MRIA) is a strong advocate of Rossaveel as an offshore servicing site; see Appendix 3.

#### 4.3.1 The Benefits of Renewable Energy

Offshore wind will play a critical role in Ireland achieving its 2030 target of having 70 per cent of electricity generated from renewable sources and the net 2050 net zero carbon target. Ireland has a phenomenal natural resource in the Atlantic winds which blow across the island.

It is expected that developing the 3.5 GW of offshore wind energy identified in the Government's Climate Action Plan would create around 2,500 jobs in construction and development and around 700 permanent operations and maintenance jobs. The Programme for Government published in 2020 has an enhanced target of 5 GW of offshore wind which would create even more employment. The industry says that in the initial stages, the development of offshore wind energy would create employment in conducting environmental surveys, community engagement and development applications for planning. As a site moves to construction, people with backgrounds in various types of engineering, marine construction and marine transport would be recruited. Once the site is up and running, a project requires a team of turbine

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<sup>10</sup> IPORES 2018 - A Review of Irish Ports Offshore Renewable Energy Services, IMDO

<sup>11</sup> Harnessing our Potential: Investment and jobs in Ireland's offshore wind industry March 2020, Carbon Trust, Green Tech Skillnet  
2<sup>nd</sup> Dec 22

technicians, engineers and administrators to ensure the wind farm is fully and properly maintained, as well as crew for the crew transfer vessels transporting workers from shore to the turbines.

A typical 500 MW offshore wind farm would require an operations and maintenance base which would be on the nearby coast. Such a project would generally create between 80-100 fulltime jobs, according to the IWEA. There would also be a substantial increase to in-direct employment and associated socio-economic benefit to the surrounding area where the operation and maintenance hub is located.

The imminent development of a number of offshore wind farms in the Republic of Ireland presents a sizable opportunity to stimulate the Irish economy through the growth of an indigenous and globally competitive offshore wind supply chain according to a study<sup>12</sup> undertaken to evaluate the economic and employment potential of the offshore wind sector for Ireland. The analysis is based on the expenditure on products and services required to develop an offshore wind farm, the planned capacity of projects in the pipeline, and the ability of Irish companies to supply the sector. Results suggest that by 2030, 2.5–4.5GW of domestic offshore wind development could create between 11,424 and 20,563 supply chain jobs and generate between €763m and €1.4bn in gross value added.

A recent report<sup>13</sup> published by Irish Wind Energy on floating wind energy noted that ports and offshore wind projects can be a locus for regional development. The port of Wick, Scotland, provides a great example of this. £20 million was invested in Wick to renovate two largely derelict port buildings for O&M facilities and to ready the port. The renovated port will serve as the O&M base for the Beatrice Offshore Windfarm, guaranteeing the Harbour Authority 25 years of rental and harbour fees, as well as supporting up to 90 full-time personnel, and more support staff. As FLOW opens up new areas for the development of projects, it provides an opportunity to address Ireland's regional economic

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1. **12** *Economic and employment impacts of offshore wind for Ireland: A value chain analysis*, Sarah Kandrot, Val Cummin, Declan Jordan & Jimmy Murphy

<sup>13</sup> *Revolution – a Vision for Floating Wind Energy*, Irish Wind Energy, July 2021  
2<sup>nd</sup> Dec 22

imbalance and associated issues, such as rural depopulation and the decline of many coastal communities, especially on the west coast.

### 4.3.2 Templates

One example of an opportunity for Rossaveel FHC is the proposed state-of-the-art O & M facility to be developed by SSE Renewables<sup>14</sup> at Arklow Harbour, Co. Wicklow, proposed as part of Arklow Bank Wind Park Phase 2.

**Fig 4.2: Drawing of Proposed O & M Facility**



Source: SSE Renewables

The facility will act as the support [base](#) for the offshore wind farm over its operational lifetime and is a key component of the planned Phase 2 520MW [Arklow Bank Wind Park](#), located 6km to 13km off the coast of Arklow, Co. Wicklow. [SSE Renewables](#) is actively progressing its plans to deliver Ireland's first offshore wind farm of scale by 2025, and expects to invest between €1 billion and €2 billion to deliver the project.

Delivery of the planned Operations and Maintenance Facility at Arklow Harbour's South Dock will require an expected investment of around €15 million.

SSE Renewables is proposing to develop the facility at a disused site known as The Old Shipyard. Approximately 60 construction roles will be created

<sup>14</sup> <https://openplans.uk/arklowbank/>  
2<sup>nd</sup> Dec 22

during the delivery phase of the Operations and Maintenance Facility alone, and additional indirect supply chain roles are expected.

Once complete, the building will accommodate around 80 full-time employees who will be recruited to work on the wind farm once it becomes operational. These direct jobs will include site managers, supervisors, technicians, control room operators, engineers, vessel crew, stores and administration staff. The wider wind park project will also support thousands of indirect and induced jobs over the project's lifetime

The Arklow Bank Wind Park will also contribute significantly to Ireland's green economic recovery and will create 10,500 FTE years nationally, 4,800 of which will be local.

Another example is the establishment at Wicklow Port the Codling Wind Park's Operations and Maintenance base, the long-term facility from which the offshore wind farm – located 13-22km off the coast of County Wicklow – will be operated and serviced.

Codling Wind Park is a 50:50 joint venture between EDF Renewables and Fred Olsen Renewables.

The busy fishing and commercial port was selected following a detailed technical study of potential port options along the east coast and engagement with relevant port authorities and stakeholders.

The new base will provide offices, warehousing and vessel berthing facilities, as well as an operations control centre. This will enable the safe operation and maintenance of Codling Wind Park over its expected 30-year operational lifetime.

A total of 115 jobs are anticipated during the construction and operational phases combined. The new facility will see the creation of 75 new, long-term, local jobs in a variety of maintenance, technician, engineering, administration, and other roles. Additional potential benefits include training, retraining and apprenticeship opportunities in the local area. There will also be opportunities for local businesses to support the planning, design, construction, and ongoing operation of the new base.

The location of the long-term base in Wicklow Town represents a major economic boost for the area, with significant investment to be made in the development of the port facilities in readiness to support Ireland's flagship offshore wind project.

### 4.3.3 Udaras na Gaeltachta Initiative

Údarás na Gaeltachta announced that they are to research and formulate a development plan for the environs of Ros an Mhíl harbour to investigate the opportunities to develop the location as a national resource for marine renewable energy. The board of Údarás na Gaeltachta has approved funding to prepare a development plan regarding the lands (30 acres) in Údarás na Gaeltachta's ownership in Ros an Mhíl in County Galway to be utilised to progress opportunities for renewable energies on the West Coast of Ireland. The land in question is immediately adjacent to the proposed site of the deep water quay and is anxious to develop this landbank.

Údarás na Gaeltachta is committed to ensuring Gaeltacht areas will benefit from any boost in the renewable energy sector in the years ahead and it will form a significant part of the Údarás na Gaeltachta Strategy for 2021-2025 to be published this year.

Renewable energy issues will be central to the organisation's new strategy for the 2021-2025 period and it will investigate issues in relation to energy conservation, carbon reductions and energy generation from renewable sources.

Ros an Mhíl has been long identified by Údarás na Gaeltachta as a strategic resource, where there are feasible opportunities for the harbour to be a strategic national centre with regards to marine renewable energy. Údarás na Gaeltachta is working hand in hand with the community and the harbour development committee to ensure that the Harbour will have the opportunity to attain every possible benefit from this sector in future and that the appropriate basic infrastructure is available in the area to that end.

In that regard, Udaras na Gaeltachta commissioned Dublin Offshore Consultants Ltd to undertake a study to include a review of the marine renewable energy sector, the opportunities that arise and the requirements and advantages that Ros an Mhíl harbour agus Gaeltacht companies have to meet future demands and to benefit from same.

The Consultants published their Report in September 2021 and Appendix 4 is the Executive Summary of their Report.

The key findings of their final Report confirm that Ros a Mhíl has the potential to play an important role supporting the significant pipeline of Floating Offshore Wind on the West Coast of Ireland. Its combined attributes of proximity to offshore project locations and consented deepwater harbour infrastructure provide the opportunity for cost effective entry into the offshore energy market for the Port. The significant economic activity associated with offshore construction and wind farm operations may be realised through long term employment opportunities local to the Port and within the region.

Specifically,

- The development of Ros a Mhíl as a support port for the floating offshore wind sector would represent a major opportunity for the Galway Gaeltacht and the wider economy. Early signs of market intent for offshore wind in the region have been demonstrated by Green Investment Group's recent acquisition of the 400MW Sceirde Rocks offshore wind farm
- Each of the scenarios examined requires additional investment in the port to become fit for purpose for all users (i.e. fishing, tourism, ferry and offshore renewables). The variation in port investment costs between €17.4M and €170.5M for operational scenarios indicates the importance of clearly identifying the targeted market segment the Port intends to service and developing infrastructure in close alignment with the industry requirements.
- Ros a Mhíl does not currently have suitable infrastructure to support large scale construction & assembly activities, and will require channel dredging, quay extension, and land redevelopment work to do so
- O&M port selection is more geographically sensitive to location than construction phase activities. Ros a Mhíl is well positioned to compete as O&M port to wind farms from Loop Head to Belmullet.
- A focus on use of the Port only for Operations and Maintenance offers the best Cost Benefit Ratio of modelled scenarios (5.95), but the lowest GVA benefit to the Galway Gaeltacht (€103.5 million) for a single 500 MW Windfarm. In total, the development and construction of a 500MW FOW project would support 66 years of employment within the Galway Gaeltacht and 61 jobs during operations
- A focus on use of Ros a Mhíl as an Assembly port offers an equivalent Cost Benefit Ratio, and significant GVA benefits (€321.3), compared to O&M only. Deployment Scenarios show a demand for port capacity in excess of the Ports' facilities, which also indicates there will be a requirement for space across a number of west coast ports.
- Project construction activities offer economic activity earlier than O&M. Ros a Mhíl will lose their first mover advantage if progressing an O&M only strategy should adjacent ports in the region develop capability to service the construction phase first. An investment decision prior to expiration of existing planning permission is key.
- Ensuring the port is suitable for O&M activities as well as Assembly will be important as a contract for O&M activities brings long term benefit and local employment. However, winning a contract to be an O&M port is more locationally dependent relative to project location than activities such as Assembly. O&M activity follows sequentially from Assembly activity, and

Ros a Mhíl may be at a disadvantage if progressing an O&M only strategy should competing ports in the region develop capability to service the Assembly phase first.

- A challenge in assessing these options is the need to have port infrastructure ready ahead of demand. Assembly activity also offers economic activity earlier than O&M. Therefore, an earlier investment decision is required, and build-out of the necessary infrastructure prior to its' planning permission running out is key.
- A 700m quay would open up the port to a wide range of manufacturing, assembly and operational activities. However, it would require significant additional cost but does not deliver a significant additional benefit.
- Environmental risk is low for the proposed additional infrastructure components identified, but additional consenting may be required for some of the additional work.
- A clear strategy for procuring crane services is key to determining the highest Cost Benefit approach in supporting the Assembly phase

The potential for Ros a Mhíl to play an active support role in the construction and operation of offshore assets on the Irish West Coast, and the benefit of this economic activity to the surrounding region, is set out in the Dublin Offshore Consultants Ltd Report. The nature of the opportunity for the Port is dependent on the pace of FOW deployments over the coming years, the platform types to be deployed, and the exact capabilities to be developed at the Port.

While the facilities specified in the planning permission granted in 2018 were not intended for support to the FOW industry, many of the key requirements for a support facility could be met by effective leveraging of this facility specification. In order for Ros a Mhíl to benefit from the burgeoning offshore industry, the timely and targeted development of dedicated infrastructure at the Port is required.

The accurate targeting of high value segments within the FOW industry is key to the guidance of beneficial development at Ros a Mhíl. Four viable scenarios have been analysed here in terms of their Market, Logistics, Environmental, and Socio-Economic impact. The variation in investment requirements, port activity and economic benefit are calculated and presented to inform decision making by all stakeholders of the Port on the direction of future investment. While the timing of build out of the FOW industry on the West Coast cannot be guaranteed, the scale of the related operations requires a magnitude of ports and harbour capacity on the West Coast not currently available and provides significant opportunity to deliver a sustainable source of high value long term employment and revenue for Ros a Mhíl.

#### 4.3.4 Sceirde Offshore Windfarm

This wind farm, being developed by Fuinneamh Sceirde Teoranta, a Galway Gaeltacht-based company, at Skerd Rocks, is a 20 turbine offshore wind farm located off the County Galway coastline, approximately 2.8km northeast of Sceirde Mór (Skerdmore), 5km southwest of Maoinis (Mweenish), Co. Galway, 14.3km southwest of Cill Chiaráin (Kilkieran), Co. Galway and 16.4km northwest of Inis Mór, Oileain Árann (Inishmore, Aran Islands). The development would include an offshore substation and buried/rock armoured (if suitable) cabling between the turbines and the substation and between the substation and shore.

The investment value of the Sceirde wind farm is currently of the order of €1 - €2 billion and would involve a diverse range of businesses including civil engineering design, specialist plant hire, shipping and transportation, rental of port facilities, purchase of turbine and electrical components and civil and marine engineering contractors etc.

According to the EIS, approximately 530 full time equivalent (FTE) jobs and 123 FTE professional and managerial jobs would be created over the 1-year construction period, both on shore and offshore. A number of these workers are likely to be sourced locally.

Also, the operational and maintenance period would involve the creation of 32 FTE jobs for the lifetime of the development. In addition, there would be investment related to monitoring of the marine environment, including the periodic hire of local boats for seabird surveys and benthic grab surveys during the first few years of the operation of the wind farm.

In May 2020, the Government announced that seven offshore renewable energy projects, including Sceirde, have been designated as Relevant Projects. These are offshore wind projects that either applied for or were granted a lease under the Foreshore Act 1933, or offshore wind projects that are eligible to be processed to receive a valid grid connection offer. The Climate Action Plan commits to increasing Ireland's offshore wind capacity to 3.5GW as part of our overall ambition to reach 70% renewable energy by 2030.

The announcement of the transition of these projects means that they can continue to work and update a number of aspects of their projects so that they will be in a position to apply under the National Marine Planning Framework (NMPF).

A number of other economic impacts are expected to arise including:

- Skills obtained in developing and operating this project are transferable and a competency would be developed that could be used elsewhere in the economy.
- The potential contribution to the area in terms of strengthening social capital and addressing persistent weaknesses in its social structure go beyond the economic benefits identified
- There is potential for other sectors such as tourism and fishing to benefit from proximity to the windfarm. The indications to date are that any negative impacts would be minor and opportunities exist
- When operational, it's estimated the project will reduce Irish carbon emissions by up to 457 Kt CO<sub>2</sub> emissions avoided per annum
- The investment would contribute to policy aims such as developing the Gaeltacht and sustainable energy thereby underpinning the credibility of policy making

In September 2021, it was announced that an Australian-based multinational, Macquaries' Green Investment Group, had acquired Fuinneamh Sceirde Teoranta.

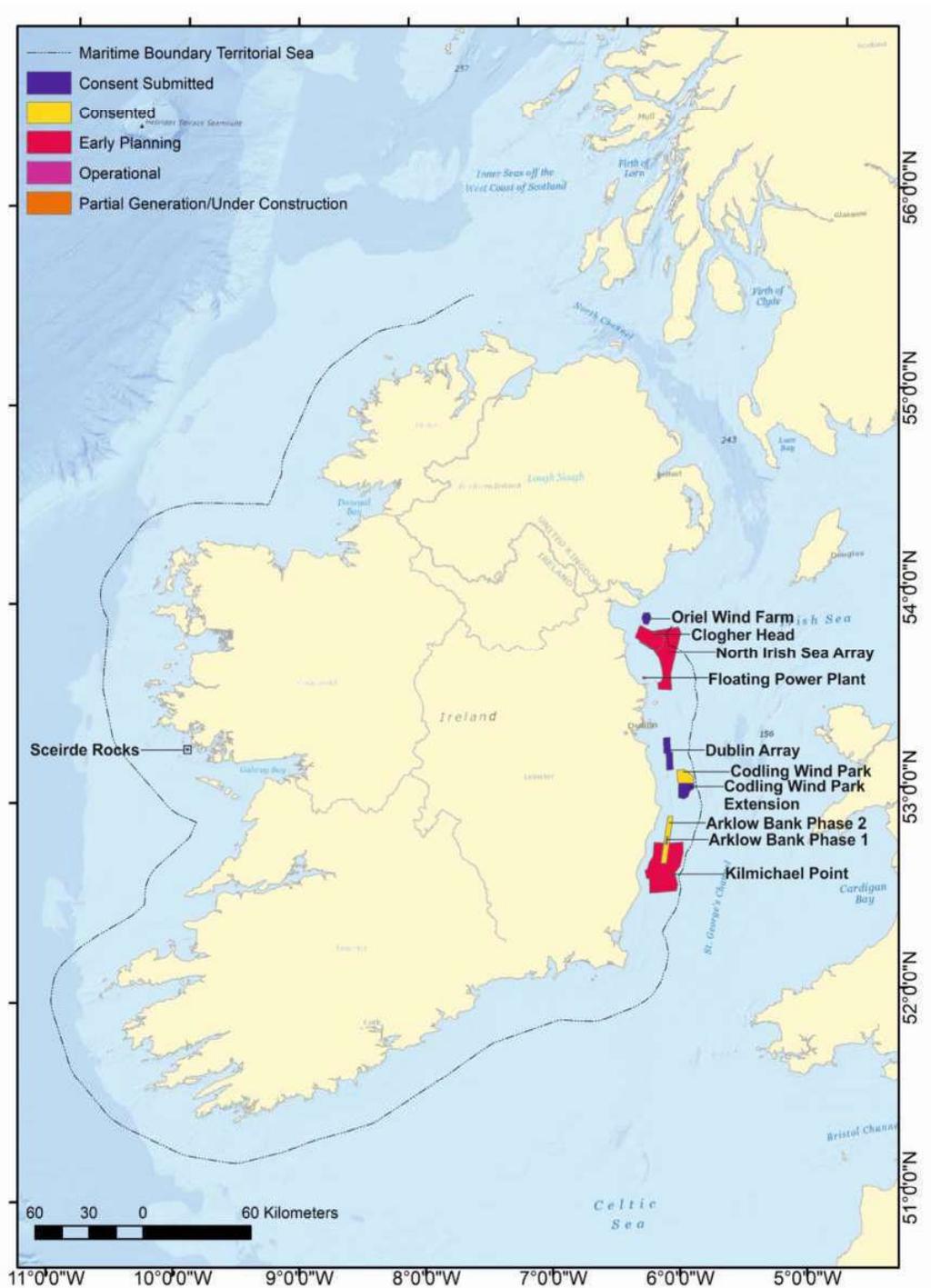
GIG, a leading renewable energy developer with a mission to accelerate the green transition, is currently developing 14 GW of offshore wind across the globe. Sceirde Rocks will be GIG's first offshore wind investment in Ireland.

GIG says the planned wind-farm would be a "flagship" development for the West of Ireland. It stated that the project will be the largest ever infrastructure project in Connemara and will position Galway as a leader in Ireland's new green energy economy.

The project will also establish a multi-million euro Community Benefit Fund, which will support sustainable community initiatives once the wind farm becomes operational.

Rossaveel FHC is ideally located to service this proposed windfarm.

Figure 4.2: Location of Sceirde Rocks Offshore Wind Site



Source: *Co-designing opportunities towards the development of Irish offshore wind*, EirWind. Adapted from 4C Offshore, (2019)

## 4.4 Other Opportunities

### 4.4.1 The Marine Institute

The Marine Institute is the state agency responsible for marine research, technology development and innovation in Ireland. They do so by providing scientific and technical advice to the government to inform policy and support the sustainable development of Ireland's marine resources.

They manage, develop and promote the two national research vessels *RV Celtic Explorer* and the smaller *RV Celtic Voyager*, 65.5m and 31.4m in length respectively, and the deep-water Remotely Operated Vehicle *Holland 1*. The research vessel operations team handles all aspects of scheduling and survey planning from ship-time application stage through to pre and post cruise preparation.

The 52.8m *Tom Crean*, Ireland's new state-of-the-art multi-purpose marine research vessel, due for completion in summer 2022, will replace the *RV Celtic Voyager*.

The *RV Celtic Voyager* regularly uses Rossaveel but the harbour at this time, cannot handle the larger vessel because of its size.

While the Institute will continue to use Galway Port as its main base, the Institute would expect to see greater use being made of Rossaveel by all of its vessels should the harbour be developed, particularly if there are difficulties with accessing alternative ports due to weather, tidal or congestion reasons.

Rossaveel's closer proximity to the Atlantic makes it an attractive port for the Institute.

### 4.4.2 The Naval Service

The Naval Service noted in their submission to the EIS that they would use Rossaveel if there was a deep water berth there. They need berths around Ireland to resupply, to refuel and embark operational equipment.

A deep water berth with 24 hour access would greatly facilitate Naval Service Operations.

## 4.5 Drivers of Development

Table 4.1 details the key parameters applied to the Drivers of Development used in this Cost Benefit Analysis and classified in terms of Costs or Benefits for the Financial Analysis and the Economic Analysis.

Discussions with BIM confirmed that the targets of 5,000 tonnes of foreign pelagic landings and 3,000 tonnes of mixed fish landings by Irish fleet vessels were not unreasonable.

It should be noted that the CBA has been undertaken based on an open quay structure to demonstrate the economic case for a potential worst case scenario (i.e. most expensive feasible option). The actual structure constructed will be decided at the detailed design stage.

**Table 4.1 (a): Parameters – Financial Analysis**

Financial Analysis				
Benefit		Costs		Data Source/Comment
Residual Value	60%	Construction Cost (Nett of Contingency and VAT)	€25.6m	GDG; excl VAT & Contingency in 2022 money terms
Values in 2022 Money Terms	€15.4m	Construction Cost (Nett of Contingency and VAT)	€25.6m	
Contingency %			10%	Sensitivity Options
Displaced Calls by Irish boats ( <i>should the deep-water berth be built</i> )	60			RBC Estimate
Calls by foreign boats (excluding any foreign vessels landing for direct export to mainland Europe or to an alternative port for processing)	12 rising to 20			RBC Estimate
Catch per Landing (Tonnes)	50 tonnes per Irish boat 250 tonnes per foreign boat			RBC Discussions
Rossaveel Revenue from increased Fish Landings	Based on GT & Fish Landings			DAFM
		Increased Operating & Maintenance Costs	Maintenance Costs of €2.5k	Estimate
Test Discount Rate %	4%			As per Public Spending Code

**Table 4.1 (b): Parameters – Economic Analysis**

Economic Analysis				
Benefit		Costs		Data Source/Comment
		Construction Cost (Nett of Contingency and VAT)	€25.6m	GDG; excl VAT & Contingency in 2022 money
Residual Value	60%			
		Shadow Price of Public Funds	130%	
Credit for reduced Shadow Price of Labour	80%			PSC (Shadow Price of Labour applied to both Construction & IMT staff) to reflect precariousness and vulnerability of labour in Gaeltacht areas
Construction Jobs/€m Spent	12			DKM
Average Salary – Construction & Processing	€35k			Industry sources
Average Selling Price per Tonne €	3,000			Industry sources
Average Added Value from Fish Processing Sector (Labour & Margin).	27%			Discussions with Industry Sources
Fish Processing Yield %	55			Industry Sources
Incremental Purchases of Fuel, Provisions and Other Services & Crew Local Spend (foreign)	€5k per Visit			Estimate
Incremental Purchases of Fuel, Provisions and Other Services & Crew Local Spend (Irish)	€1k per Visit			Estimate
Added Value per Tonne of Fish Landed	€270			SFPA Stats, Ocean Wealth Data
Added Value from Local Spend	65%			Derived from CSO Input/Output Tables
Incremental Labour (FTEs)	40			
Average Tax Rate %	20			Estimated
Incremental Processing Labour Costs	€1,400,000			Discussions with Industry Sources and derived from FTEs and Average Salary/FTE

## 4.6 Financial Cost Benefit Analysis

The elements that make up the Financial Cost Benefit Analysis are:

- Revenue from the Irish and Foreign Fishing sectors in terms of vessel calls and fishing landings
- Capital Expenditure including Residuals
- Less Operating & Maintenance Costs

The key assumptions driving the financial cost-benefit analysis are as follows:

- CAPEX €m 25.6
- Discount Rate 4.0
- Port Infrastructure Depreciation (years) 50
- Straight Line Depreciation
- Residual Value of 60 per cent of CAPEX
- Year 0 is 2022 and Year 20 is 2042
- Year 1 is first year of operation

Applying the values set out in Table 4.1, Table 4.2 provides details of the Key Parameters for the period between 2023 and 2042.

**Table 4.2: Cost Benefit Analysis – Financial Base Case**

	2023	2028	2033	2038	2042
<b>Incremental Fish Catch (Tonnes)</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income €</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 3.37% (€m)</b>	-16.8				
<b>IRR %</b>	-1.8				
<b>Benefit/Cost Ratio</b>	0.1				

## 4.7 Exchequer Cost Benefit Analysis

The components that make up the Exchequer Cost Benefit Analysis are:

- Capital Expenditure
- Port Revenue from Foreign and Irish Fishing Traffic
- Less Operating & Maintenance Costs
- Taxes from Jobs in Fish Processing
- Corporate Taxes on Shipping Company

- Taxes on Construction Employment
- Corporate Taxes on Construction Companies

Table 4.3 provides a summary of the Key Parameters for specific years between 2023 and 2042. It should be noted that the economic values returned are very sensitive to the Corporate Tax rate used.

**Table 4.3: Cost Benefit Analysis – Exchequer Base Case**

	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit €</b>	832,123	866,040	866,040	866,040	866,040
<b>Economic NPV @ 4% (€m)</b>	<b>-10.4</b>				
<b>IRR %</b>	<b>-2.3</b>				
<b>Benefit/Cost Ratio</b>	<b>0.8</b>				

#### 4.8 Economic Cost Benefit Analysis

The components that make up the Economic Cost Benefit Analysis are:

- Capital Expenditure including Residuals incorporating Shadow Price of Public Funds
- Port Revenue from Foreign and Irish Fishing Traffic
- Less Operating & Maintenance Costs
- Shadow Price of Labour
- Added Value from Landings of Irish catch
- Added Value from Fish Processing of Irish catch
- Added Value from Local Spend by Vessels at Rossaveel

The key assumptions driving the economic cost-benefit analysis are as follows:

- Shadow Price of Public Funds % 130
- Shadow Price of Labour 80
- Added Value of Fish Landed per Tonne € 270
- Added Value of Fish Processing Sector % 27
- Added Value of Local Purchasing % 65
- Purchases of Fuel, Provisions and Other Services per Foreign Vessel Landing € 5,000
- Purchases of Fuel, Provisions and Other Services per Irish Vessel Landing € 1,000

The average estimate of Added Value assumes that all species are graded and whole round frozen. The sale price of Mackerel and Horse Mackerel would be higher and the sale price of Herring, Sprat and Blue Whiting would be lower so on average over all species and quantities, €1000 / Mt sales price ex factory, is considered reasonable.

That figure would include, the cost of the fish, labour, packaging, freezing, transport to the factory, a contribution to overheads and a profit margin.

A Socio-Economic report carried out for The Polyvalent Fishing and Processing Group in 2009 by Erinshore Economics Ltd found that every additional €1 Million of fish landed for processing in Ireland would result in an overall increase in output throughout the Irish economy as a result of the combined multiplier effects of €3.88 Million.

Table 4.3 provides a summary of the Key Parameters for specific years between 2023 and 2042.

**Table 4.4: Cost Benefit Analysis – Economic Base Case**

	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit €</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	14.2				
<b>IRR %</b>	7.7				
<b>Benefit/Cost Ratio</b>	1.6				

While Iasc Mara Teo is currently not operating, it is assumed that the factory will have commenced processing fish from other sources at the time of the availability of the new berth. Should this not be the case, the socio-economic benefits arising from the new berth would be higher because of the creation of new jobs.

#### 4.9 Summary of Projected Impact and Economic Benefits

From the foregoing it can be seen that Rossaveel Fishery Harbour and the proposed deep water berth are of local and regional importance both economically and socially.

In the first instance and most significantly, the proposed development will facilitate the entry of vessels that heretofore could not enter the harbour because of inadequate water depth.

The new development will facilitate additional fish landings of over 150,000 tonnes over the next twenty years or so. Most of this additional tonnage is expected to be foreign landings, while the balance will be from Irish vessels that will be a mixture of new catch and previously landed fish at Irish or non-Irish ports.

The overall economic impact is, in fact, under-estimated as it should be noted that a prudent and conservative approach has been adopted to projecting expected landings.

In addition, the value of time, the expected health & safety benefits and congestion savings have not been taken into account.

In particular, what has been excluded is the significant impact of the proposed facility to service the Sceirde offshore Wind Energy Farm that has been identified by Eirgrid as one of the sources of offshore energy to come onstream by 2030. This development is expected to give rise to many direct and indirect jobs, and significant local spend. This spend is likely to amount to many millions of Euro annually.

#### 4.10 Employment Impacts

The proposed development will impact on employment locally both directly and indirectly initially during construction. Thereafter, direct impacts will arise through increased numbers employed in fish processing, agency services and port users.

Modern processing technology has resulted in significant automation and reduction in overall labour requirements. A total staff of 50 to 55 skilled staff would be required during an eight month season this would drop to 25 in the off season. The estimate of total annual labour cost would be €1.4 to 1.5 Million. Approximately the same number of people would be employed in local businesses supplying goods and services to the factory, for example transport, packaging suppliers, engineering services, accountancy, local shops, hospitality and garages etc.

#### 4.11 Social Impacts

The proposed development will support the long established fishing tradition which is integral to the social and cultural life of Rossaveel. The development will allow the coastal community to be revitalised as a key fishing harbour and address the effects of BREXIT by ensuring that the fishing industry will continue to be accommodated at Rossaveel.

#### 4.12 DKM Cost Benefit Analysis Report

DKM, now EY DKM, carried out the original CBA on the proposed Deep Water Quay based on the original cost estimated by Mott Macdonald of €29.2 million. The CBA was published in late June 2017.

The CBA was carried out in accordance with the Public Spending Code Guidelines then in place that subsequently have been developed and expanded.

Based on a range of assumptions including the achievement of landings of 7,774 tonnes of demersal species and 44,054 tonnes of pelagic fish by Year 20, the Socio Economic Cost Benefit Analysis showed for Option 2, the *Do Project*, the following results:

- NPV of €27 million
- Internal Rate of Return of 10.6 per cent
- Benefit/Cost Ratio of 2.83

Since the production of that CBA Report, a number of significant events have occurred that would, no doubt, have influenced the assumptions and analysis results.

They include:

- The reduction in CAPEX values
- BREXIT and the revised reduced quotas for Ireland
- The issues raised in recording fish catch, particularly in relation to pelagic fish
- Covid 19
- The voluntary liquidation of Iasc Mara Teo (now out of it)
- The development of new berths and facilities at the Fishery Harbour Centres of Castletownbere and Killybegs
- The ever-increasing likelihood of Rossaveel being selected for servicing the Sceirde Rocks offshore wind farm.

## 5. Risk and Sensitivity Analysis

In this Chapter, we carry out a brief Risk Analysis and examine the impact of an increase of 10 per cent on the Capital Cost of the project.

### 5.1 Risk Analysis

The principal risks facing this development relate to

- CAPEX increase and/or programme over-running
- Failure to secure anticipated fish catch volumes
- Diversion to alternative ports without local processing
- Difficulties with processing anticipated volumes

We consider each of them briefly.

#### 5.1.1 CAPEX Increase and/or Programme Over-Running

Serious construction inflation, eg in the cost of labour, of steel or other raw materials, could result in a major increase in the cost of the project.

An appropriate Contingency Sum should be added to the budget sum to take account of such eventualities.

Major projects can suffer from delay for all sorts of reasons. It would be important to choose a reputable contractor with relevant experience during the tender process and ensure scope / schedules are put in place from the outset to ensure smooth delivery of project.

#### 5.1.2 Failure to Secure Anticipated Fish Catch Volumes

The fish projections were developed in association with local stakeholders and consideration of the intentions of some Irish companies to land at Rossaveel if the deep water berth was provided.

With the best intentions and changing circumstances, the delivery of the projections may be affected adversely with a consequent impact on the overall benefits.

For instance, the recent capital developments at Killybegs and Castletownbere may influence the potential volumes through Rossaveel.

### 5.1.3 Difficulties with Processing Anticipated Volumes

It is assumed that all Irish vessel landed fish will be processed at Iasc Mara Teo.

Any failure by the company to deliver the required output on schedule, to the quality expected and in line with budget may also impact volumes landed.

## 5.2 Sensitivity Analysis on Base Case

Other scenarios have been examined:

- The impact of a 10 per cent increase on the CAPEX
- The impact of a 15 per cent increase on the CAPEX
- The impact of a 20 per cent increase on the CAPEX
- The impact of a 25 per cent increase on the CAPEX
- The impact of a 40 per cent increase on the CAPEX
- Annual landings of Irish catch of 2,000 tonnes
- Exclusion of Shadow Price of Labour Benefits and a 25 per cent increase in CAPEX

For each case, we present details of

- NPV
- IRR
- Benefit/Cost Ratio

### 5.2.1 10 Per Cent Increase on CAPEX

This scenario examines the impact of a further increase in the Capital Costs by 10 per cent, ie, an expenditure of €28.2 million.

Table 5.1 shows the Financial and Economic impacts.

**Table 5.1: Capital Costs Increase by 10 per cent**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 4% (€m)</b>	<b>-18.6</b>				
<b>IRR %</b>	<b>-1.9</b>				
<b>Benefit/Cost Ratio</b>	<b>0.1</b>				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	<b>12.0</b>				
<b>IRR %</b>	<b>6.9</b>				
<b>Benefit/Cost Ratio</b>	<b>1.5</b>				

Table 5.1 demonstrates an economic NPV of €12 million, IRR of 6.9 per cent and a Benefit / Cost Ratio of the order of 1.5 still justifying the investment.

## 5.2.2 15 Per Cent Increase on CAPEX

This scenario examines the impact of a further increase in the Capital Costs by 15 per cent, ie, an expenditure of €29.4 million.

Table 5.2 shows the Financial and Economic impacts.

**Table 5.2: Capital Costs Increase by 15 per cent**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 4% (€m)</b>	<b>-19.6</b>				
<b>IRR %</b>	<b>-1.9</b>				
<b>Benefit/Cost Ratio</b>	<b>0.1</b>				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	<b>10.9</b>				
<b>IRR %</b>	<b>6.5</b>				
<b>Benefit/Cost Ratio</b>	<b>1.4</b>				

Table 5.2 demonstrates an economic NPV of €11 million, IRR of 6.5 per cent and a Benefit / Cost Ratio of the order of 1.4 still justifying the investment.

### 5.2.3 20 Per Cent Increase on CAPEX

This scenario examines the impact of a further increase in the Capital Costs by 20 per cent, ie, an expenditure of €30.7 million.

Table 5.3 shows the Financial and Economic impacts.

**Table 5.3: Capital Costs Increase by 20 per cent**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 4% (€m)</b>	<b>-20.5</b>				
<b>IRR %</b>	<b>-2.0</b>				
<b>Benefit/Cost Ratio</b>	<b>0.1</b>				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	<b>9.8</b>				
<b>IRR %</b>	<b>6.2</b>				
<b>Benefit/Cost Ratio</b>	<b>1.3</b>				

Table 5.3 demonstrates an economic NPV of €10 million, IRR of 6.2 per cent and a Benefit / Cost Ratio of the order of 1.3 still justifying the investment.

## 5.2.4 25 Per Cent Increase on CAPEX

This scenario examines the impact of a further increase in the Capital Costs by 25 per cent, ie, an expenditure of €32 million.

Table 5.4 shows the Financial and Economic impacts.

**Table 5.4: Capital Costs Increase by 25 per cent**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 4% (€m)</b>	<b>-21.4</b>				
<b>IRR %</b>	<b>-2.0</b>				
<b>Benefit/Cost Ratio</b>	<b>0.1</b>				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	<b>8.7</b>				
<b>IRR %</b>	<b>5.9</b>				
<b>Benefit/Cost Ratio</b>	<b>1.3</b>				

Table 5.4 demonstrates an economic NPV of €8.7 million, IRR of 5.9 per cent and a Benefit / Cost Ratio of the order of 1.3 still justifying the investment.

## 5.2.5 40 Per Cent Increase on CAPEX

This scenario examines the impact of a further increase in the Capital Costs by 40 per cent, ie, an expenditure of €35.8 million.

Table 5.5 shows the Financial and Economic impacts.

**Table 5.5: Capital Costs Increase by 40 per cent**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 4% (€m)</b>	<b>-24.2</b>				
<b>IRR %</b>	<b>-2.0</b>				
<b>Benefit/Cost Ratio</b>	<b>0.1</b>				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	<b>5.4</b>				
<b>IRR %</b>	<b>5.0</b>				
<b>Benefit/Cost Ratio</b>	<b>1.2</b>				

Table 5.5 demonstrates an economic NPV of €5.4 million, IRR of 5.0 per cent and a Benefit / Cost Ratio of the order of 1.2 still justifying the investment.

## 5.2.6 Exclusion of the Benefits of the Shadow Price of Labour and a 25 Per Cent Increase on CAPEX

This scenario examines the impact of excluding the benefits of the Shadow Price of Labour (€280,000 annually) and a further increase in the Capital Costs by 25 per cent, ie, an expenditure of €32 million.

Table 5.6 shows the Financial and Economic impacts.

**Table 5.6: Capital Costs Increase by 25 per cent and Exclusion of Shadow Price of Labour**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	6,000	8,000	8,000	8,000	8,000
<b>Irish Calls</b>	60	60	60	60	60
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	72	80	80	80	80
<b>Incremental Financial Income</b>	102,123	136,040	136,040	136,040	136,040
<b>Project NPV @ 4% (€m)</b>	<b>-21.4</b>				
<b>IRR %</b>	<b>-2.0</b>				
<b>Benefit/Cost Ratio</b>	<b>0.1</b>				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	2,606,623	2,666,540	2,666,540	2,666,540	2,666,540
<b>Economic NPV @ 4% (€m)</b>	<b>4.9</b>				
<b>IRR %</b>	<b>5.0</b>				
<b>Benefit/Cost Ratio</b>	<b>1.2</b>				

Table 5.6 demonstrates an economic NPV of €4.9 million, IRR of 5.0 per cent and a Benefit / Cost Ratio of the order of 1.2 still justifying the investment.

## 5.2.7 Annual Landings of 2,000 Tonnes from Irish Vessels

The Base Case assumed landings of 3,000 tonnes of Irish catch.

This scenario considers the impact of landings of 2,000 tonnes.

Table 5.7 shows the Financial and Economic impacts.

**Table 5.7: Average Annual Landings of 2,000 Tonnes**

<i>Financial Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Fish Catch</b>	5,000	7,000	7,000	7,000	7,000
<b>Irish Calls</b>	40	40	40	40	40
<b>Foreign Calls</b>	12	20	20	20	20
<b>Total Calls</b>	52	60	60	60	60
<b>Incremental Financial Income</b>	84,207	118,124	118,124	118,124	118,124
<b>Project NPV @ 4% (€m)</b>	-17.0				
<b>IRR %</b>	-1.9				
<b>Benefit/Cost Ratio</b>	0.1				
<i>Economic Impact:</i>	2023	2028	2033	2038	2042
<b>Incremental Economic Benefit</b>	1,860,207	1,920,124	1,920,124	1,920,124	1,920,124
<b>Economic NPV @ 4% (€m)</b>	4.0				
<b>IRR %</b>	5.1				
<b>Benefit/Cost Ratio</b>	1.2				

Table 5.7 demonstrates an economic NPV of €4 million, IRR of 5.1 per cent and a Benefit / Cost Ratio of 1.2.

As this table shows, reducing the volume landed and processed does not impact the economic return and the viability of the project.

## 6. Conclusion

This document sets out the initial outline Cost Benefit Analysis of the proposed deep water berth at Rossaveel Fishery Harbour Centre. The general approach to carrying out a CBA is set out in Circular 13/13 of the Department of Public Expenditure and Reform: *The Public Spending Code: Expenditure Planning, Appraisal & Evaluation in the Irish Public Service - Standard Rules & Procedures*.

In 2020, almost 3,100 tonnes of fish were landed at Rossaveel with a value of some €11.1 million. Approximately 250 tonnes of the 3,100 tonnes landed were by foreign vessels.

Iasc Mara Teo, the only fish processor in Rossaveel, closed in April 2018 following the loss of supply of fish to Killybegs. The Iasc Mara factory has modern processing, freezing and cold storage facilities that is available for catch landed at Rossaveel.

The lack of deep water in Rossaveel has constrained the growth in landings as the depth is not sufficient for modern fishing vessels to berth there.

As noted in Food Wise 2025, there is a need to develop and initiate practical and competitive measures to attract additional landings into Irish ports and continue to invest significantly in necessary infrastructure at the Fishery Harbour Centres ensuring that sufficient quay space and draught is available to avoid queuing and to facilitate quick vessel turnaround at the ports.

The Government's policy document, *Our Rural Future: Rural Development Policy 2021 -2025*, notes in Chapter 10, *Supporting the Sustainability of our Islands and Coastal Communities* that the marine economy is a key enabler of effective regional development, especially in remote coastal communities.

It is also Government policy to grow, encourage and promote local fish processing by fish landed by foreign vessels.

The provision of a deep-water berth at Rossaveel would address a range of opportunities including:

- Catering for additional landings from Irish and foreign vessels
- enabling the servicing of potential offshore windfarms
- reducing congestion and delays to entry
- mitigating health and safety risks
- facilitating increased cargo landings

Rossaveel has been recognised, because of its location, available land alongside and community support, to be of great strategic importance for servicing both the fixed and floating offshore windfarm sector that are expected to give rise to many direct and indirect jobs, and significant local spend. This spend is likely to amount to many millions of Euro annually much of which will support the Rossaveel and surrounding economies. This development alone would justify the provision of the deep-water berth.

Discussions with the developer of the proposed Sceirde Offshore Wind Energy facility, the Marine Renewables Industry Association and Udaras na Gaeltachta indicate that Rossaveel has major potential for supporting the sector.

The economic well-being of Rossaveel is very much linked with the fortunes and future of the Fishery Harbour Centre. For instance, the deep water berth will facilitate the reopening of the local fish processing plant that will result in the creation of some 50 to 55 skilled staff during an eight month season that would drop to 25 in the off season. Approximately the same number of people would be employed in local businesses supplying goods and services to the factory.

The provision of a deep water berth at a cost of €25.6 million, excluding VAT, will also lead to a growth in local spending by visiting fishing vessels. This spend would cover such purchases as fuel, food, ice, vessel maintenance, local transport and hospitality, medical attention etc.

However, it should be noted that the CBA has been undertaken based on an open quay structure to demonstrate the economic case for a potential worst case scenario (i.e. most expensive feasible option). The actual structure constructed will be decided at the detailed design stage.

The CBA on the Core Option of annual landings of 5,000 tonnes of foreign catch and an additional 3,000 tonnes of Irish catch, with processing of Irish catch only, generated the following results:

	NPV (€m)	IRR (%)	Benefit/Cost Ratio
<b>Financial Analysis</b>	-16.8	-1.8	0.1
<b>Economic Analysis</b>	14.2	7.7	1.6

If Irish landings are restricted to 2,000 tonnes, the following results are obtained:

	NPV (€m)	IRR (%)	Benefit/Cost Ratio
<b>Financial Analysis</b>	-17.0	-1.9	0.1
<b>Economic Analysis</b>	4.0	5.1	1.2

It should be noted that the overall economic impact of the proposed development as set out under the Core Option is, in fact, under-estimated as a prudent and conservative approach has been adopted to projecting expected landings.

Adopting the Public Spending Code Guidelines, an annual net revenue of €1.6 million, including 1,600 tonnes of fish processed locally, is required to break-even on the proposed CAPEX. It is generally accepted that the achievement of such minimum volumes is highly likely.

Serious consideration should be given to the co-development and funding of the proposed development with Udaras na Gaeltachta/Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media because of their joint interest in and because of the benefits that will accrue to the stakeholders of each.

**The overall analysis confirms that there is a business case for the proposed development and that the new berth would be a catalyst for the socio-economic regeneration of Rossaveel and its regional environment.**

# Appendix 1

## CBA Analysis of Core Option

2<sup>nd</sup> Dec 22

**MWP**

17648 -6109 G









## Appendix 2

# Open Piled Quay Wall Concept Appraisal and Cost Estimate Assumptions<sup>15</sup>

### INTRODUCTION

This appendix has been specifically prepared to accompany the numerical modelling work undertaken with respect to an alternative open piled quay wall at Rossaveel Fishery Harbour Centre. It also builds on the previous work by GDG in their peer review report (reference “18122-R-002 - Quay Wall Peer Review Report”) where a variety of vertical quay wall solutions were developed with associated cost estimates for dredging and marine civils works.

As outlined in the body of this study, the use of an open piled quay wall may offer benefits to DAFM in terms of providing marginal improvements to the operability of the new deepwater port facility. The work contained in this appendix should be considered in particular context with the wind analysis and percentage occurrence of wind and wave conditions at occurring at the deepwater port site.

### OPEN PILED QUAY WALL ARRANGEMENT

Considering the original functionality of the deepwater quay in terms of quay loading, achieving dredge depth at the adjacent berth slot of up to -12m CD, quay line, fendering, drainage, services, etc, along with new requirements such as wave absorption capability (i.e. rock armour profiling, sizing and composition) and having to carry a suspended reinforced concrete deck in an open-piled arrangement, GDG has developed a concept design for the open piled quay wall.

A full-scale drawing illustrating the proposed concept has been included in Appendix A.1, but screen-clips from the drawing are provided below for ease of reference. A cross-section taken from the drawing is provided below in Figure A-1.

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<sup>15</sup> Numerical Modelling Report, GDG Gavin & Doherty Geosolutions, November 2021  
2<sup>nd</sup> Dec 22

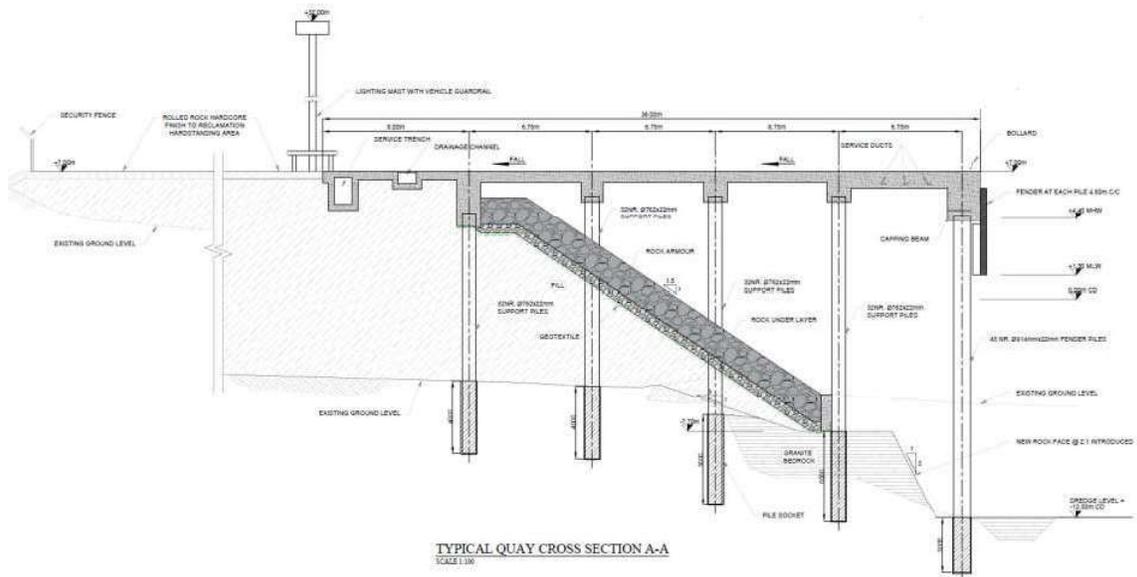


Figure A-1 Cross-Section through Open Piled Quay Wall

The main elements comprising the concept design have been laid out in an anticipated set of construction stage steps, as follows:

1. Similar to the previous solutions developed in the peer review report, a ledge of rock shall be formed in an effort to minimise rock dredge volumes in proximity to the quay line. Whilst the final dredge level is subject to final agreement, either -12m CD or -10m CD berth pocket dredge level can be accommodated. A new rock face at 1:2 (V:H) shall be formed in the granite bedrock during dredging using drilling and blasting methods, also such that a reasonably flat ledge of rock at -7.7m CD is formed to help support the rock armour revetment. Rockfill generated from the dredging process is to be readily stored within the main filled area within the reclamation area.
2. Drilled rock socketed steel piles shall be installed into the underlying granite bedrock in order to support the new suspended reinforced concrete deck. Piles are expected to be rock socketed circa 3.0m into rock using an oversized casing. Pile lengths may typically vary between 16 - 22m. Piles shall generally be arranged on a 6.75m (transverse spacing) x 6.50m (longitudinal spacing) pile grid to accommodate an approximate design load of at least 50 kN/m<sup>2</sup>. Piles are expected to be circa 762mm dia x 22mm thk S430 steel grade. However, the most seaward gridline, gridline 1, shall comprise 813mm dia x 22mm thk S430 steel grade piles spaced at 4.5m centres. Thus, a total of circa 173nr piles are required across the extent of the 200m long quay, 4nr gridlines comprising 32nr and 1nr gridline at the seaward face with 45nr piles. The piles shall be closed end and shall be grouted in place around their annulus within the rock socket. Piles are likely to be installed on site using either jack-up barge or floating marine plant given their relative location away from shore.
3. The rock armour revetment shall be constructed following piling activities. A concrete facing panel shall first be installed between adjacent piles along pile gridline 2 (i.e. one gridline in from most seaward gridline, gridline 1), in order to prevent the toe of the revetment from pushing seawards. The revetment comprises core rockfill material with a geotextile prepared base layer with two layers of rock armour overlain, as i) underlayer, relatively lightweight armour typically around 100 – 300 kg and ii) and primary layer armourstone comprising 2nr separate layers of heavier 1 – 3 tonne rock armour. The main core material of the revetment shall be obtained primarily from dredging works of the navigation channel and berth; however, with additional material needed to be imported to site from local quarries. The revetment shall be brought up

in layers achieving the 1:1.5 (V:H) gradient set. Each layer shall be carefully compacted and placed with cognisance paid to the presence of the new piles. It should also be noted that in keeping within the original planning boundary, the northern face of the revetment shall wrap around underneath the extent of the suspended deck, with the inclusion of a vertical sheet piled wall into the corner of the filled area in this location (refer to Figure A-2), which may provide the added benefit of having a short length of quay face approximately 50m long at circa -4m to -6m CD.

4. At this point, filling activities behind the quay can proceed concurrently alongside installation of the structural elements of the quay including the reinforced concrete deck and capping beam, services including water, lighting, electricity, etc, fendering and remaining deck furniture including bollards, safety ladders, life-rings, etc.

A plan arrangement demonstrating the extents of the 200m long open piled quay is provided below in Figure A-2. As illustrated, the rock armour revetment should wrap around at either end appropriately in order to remain within the original planning boundary.

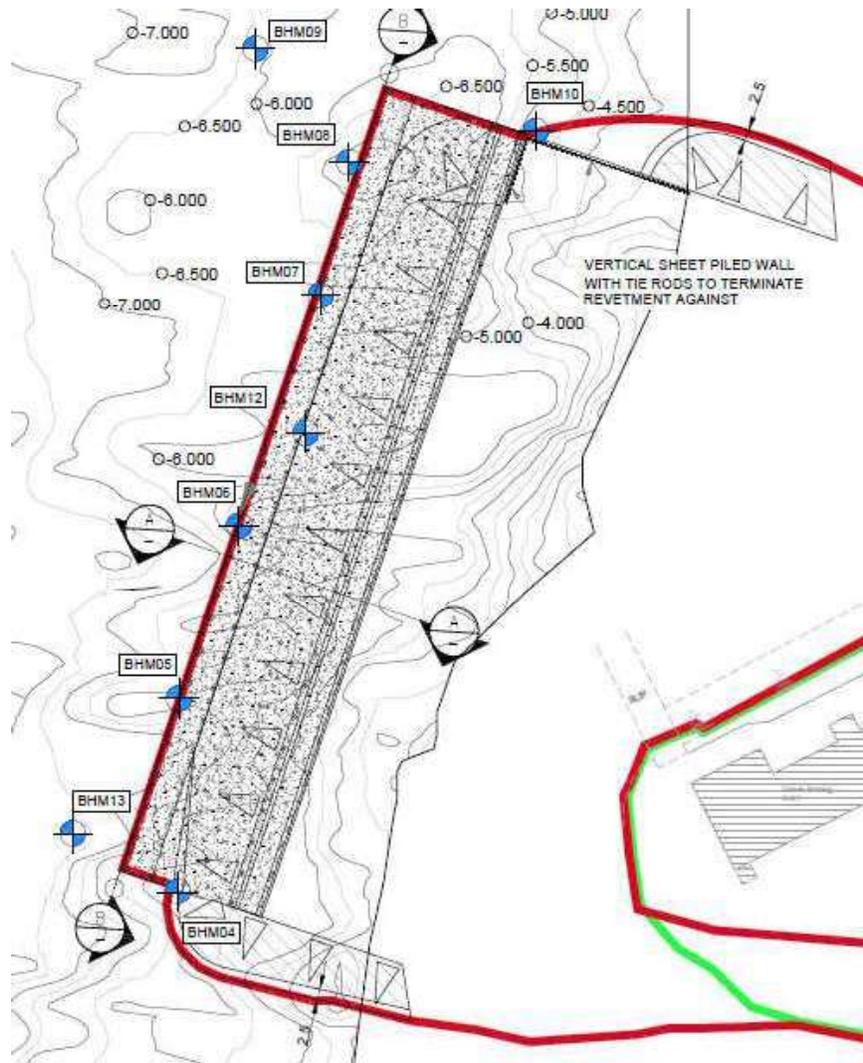


Figure A-2 Plan Arrangement of Open Piled Quay Wall

## OPEN PILED QUAY WALL ARRANGEMENT

### COST ESTIMATE ASSUMPTIONS

The following assumptions have been made with respect to cost estimation.

- The baseline of the original cost has been extracted from a cost assessment carried out by Mott MacDonald in 2017. The prices that have been quoted exclude VAT.
- Estimates of the original cost have been made using the planning drawings provided. Similar cross section layouts have been used to produce cost savings for the newly proposed conceptual designs.
- All dredged material is being reused in filling / placement behind to form the revetment core and main reclamation area.
- In order to draw direct comparison of cost savings between other design options, generally the plan extents of the structure are retained between options.
- The estimates provided are generally best estimates of likely contract costs without any additional provision for contingencies.
- The costs are subject to variation from factors such as barge and marine plant availability, stability of the rock slope in front of the proposed revetment, extent, type and frequency of fendering required, any influence from variation in rock strength and its stratification along the wall, final quality of backfill material (after dredging and recovery), remoteness of the site which may restrict availability of material and concrete deliveries, etc.
- We consider that the costs presented may be taken as fairly representative of the different costs relative to one another as costings has been based on relative parametric costs.
- It may be expected that the costs presented will need to be re-assessed at a later date, closer to tendering / procurement.
- Reasonable assumptions on design loads and toe levels have been made during concept design development. Refinement and variation of loading scenarios could influence specific options to a greater or lesser extent.

At this stage a contingency figure of +10 to +20% would not be unreasonable given recent market volatility combined with reduced material availability.

## COST ESTIMATE

The cost estimate for the open piled quay wall is presented in Table A-1. This option is referred to as Option 4, given the numbering of previously developed concept designs and cost estimates.

**Table A-1 Option 4 (Open Piled Quay Wall) 2021 Cost Estimate**

<b>Key Element of Works</b>	<b>Description</b>	<b>Estimated Cost</b>
Dredging	Rock and overburden dredging incl. rock slope formation and material re-use and handling	€6.3m
Quay Wall Structures	Open piled quay construction incl. mobilisation, both drilled tubular piling and sheet piling works	€10.0m
Concrete Elements	Reinforced concrete quay slab, concrete pavement and vertical boundary walls	€3.1m
Reclamation Fill	Imported rockfill, rock armour revetments, general reclamation fill and Clause 804 for access road	€5.4m
Ancillary Civils Works	Various items incl. drainage, services, perimeter fencing, high mast lighting and marine fendering	€0.8m
<b>Total Cost</b>		<b>€25.6m</b>

## **Appendix 3**

# **Letter of Support from the Marine Renewables Industry Association**

2<sup>nd</sup> Dec 22

**MWP**

17648 -6109 G



Raymond Burke  
Verona  
9 Ballinlea Road  
Killiney  
Co Dublin

8 July 2021

Dear Raymond,

I was delighted to discuss the possible future development of Rossaveal Harbour from the perspective of the Offshore Renewable Energy (ORE) industry with you yesterday.

Ireland's major ORE resource lies off the west coast where the wind speeds and availability levels are global leaders while our west coast waves are deemed the most energy intensive world-wide. Three factors will drive the development of these resources.

First, west coast *wind* will be exploited almost exclusively (Sceirde Rocks is an exception to the rule) by Floating Offshore Wind (FLOW) technology which is rapidly emerging. This is due to various reasons, most notably the closeness to shore of the 50m depth contour line (practical limit of most traditional Bottom Fixed Offshore Wind turbine types) in the west. Several of the projects seeking sites already off the south coast involve FLOW - (part of) the SSE project and the full proposals by DP Energy, Simply Blue Energy and ESB/Equinor's 'Celtic 2' are based on this technology. The vast majority of the planned projects off Clare (to take advantage of the grid capacity that will be released when the 1GW Moneypoint coal station closes in 2025) are also based on FLOW. Floating offshore wind activity has increased rapidly in the past 5 years. Global installed capacity stands at 65MW but there is currently 25GW of floating wind capacity under development worldwide. *Wave* energy is at an earlier stage and will start to emerge in the 2030s. Ireland's *National Energy and Climate Plan 2021-2030* includes indicative wave capacity forecasts for the 2030s. Wave energy off the Irish coast is likely to be largely focused on the west coast.

The second driver of ORE is Government policy. The Programme for Government calls for a pal develop 30GW of FLOW of the west coast in the 2030s which will be underpinned by an exercise called *Offshore Renewable Energy Development Plan 2* which is now underway in the Department of Environment, Communications and Climate. This will inter alia update the locations of the ORE resource off our coasts and facilitate planning of the *Designated Maritime Area Plans* i.e., zones provided for in the new Maritime Area Planning Bill.

The final driver will be market opportunity. Our early ORE will be fully utilised by domestic needs as we decarbonise the electricity system but export opportunities will arise from a variety of sources such as the UK where the generating fleet is reaching mass retirement and the Government is actively seeking electricity deals with its neighbours;

the development of an EU wide energy market linked up by an undersea grid is progressing rapidly and will enable Ireland to export to continental Europe where some countries (e.g., Germany) have limited renewable resources; and, of course, the rise of hydrogen is already leading energy giants to think in terms of converting seawater into hydrogen using offshore, west of Ireland wind and wave machines, and shipping e.g., in converted oil tankers to Europe.

Turning to the shore support required to support the ORE future, this breaks down into three elements. First, **turbines have to be installed** on site and this involves such activities as cable laying to shore, construction of sub-stations ashore (and at sea), assembly of key components etc. This requires support from a local port. A key feature of the ORE industry is that the specialist vessels required in this phase are very expensive to hire and industry is always seeking to minimise 'steaming' distances.

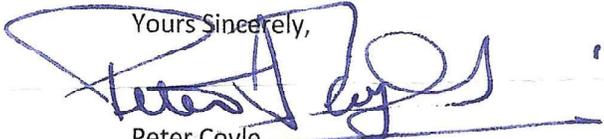
Second, a wind farm will last c25 years and then will have to start all over again with new turbines etc. The **Operations and Maintenance (O&M)** required over the life time of a farm involves a shore operations centre, a logistic facility ashore and vessels to transport technicians to and from individual turbines for maintenance. Occasionally, major components may have to be replaced or a turbine towed into a shore base for repair. A good rule of thumb would be to envisage about 100 people being employed full time on O&M per wind or wave farm. A point to bear in mind is that the types of vessels required to support the developments off the west coast are likely to be similar in size (c80m in length) to the vessels used to support oil and gas fields. There is potentially employment available for fishers who may decide or need to leave that industry.

Finally, a **cluster of major developments** off the west coast may drive decisions to **manufacture major components** close to site e.g., Siemens are currently building a blade factory, to supply the southern North Sea, at Le Havre - c800m long and will employ c700 people. This would be a great prize for the 2030s.

We in industry have long been concerned about port capacity on the west coast to support ORE - please see *MRIA Discussion Paper on Maritime Infrastructure Development Priorities to Support Ireland's Future Ocean Energy Industry* available at the Publications page of [www.mria.ie](http://www.mria.ie) . There is a role for all ports on the west coast but, taking into account the potential scale of the opportunity in the 2030s, the nature of the technologies involved, the 'steaming' distance issue etc, there is a need for extra capacity to serve the seas to the west of Galway and Mayo in particular.

We fully support the efforts of Údarás na Gaeltachta to develop a plan for Rossaveal (we are a member of the steering group) by way of consultation with key stakeholders (industry, local community etc) and the development of options by consultants. We don't believe that there is an immediate need for investment decisions necessarily but it would be a major blunder if the existing consents associated with possible quay developments at Rossaveal were allowed to lapse. We urge the Department of Agriculture, Food and Marine to renew them and to keep closely in touch with the vital work being undertaken by An Údarás.

Yours Sincerely,



Peter Coyle

Chairman



[www.mria.ie](http://www.mria.ie)

@Marineireland

## Appendix 4

### Executive Summary Report from Udaras na Gaeltachta

2<sup>nd</sup> Dec 22

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# DOC Dublin Offshore



## EXECUTIVE SUMMARY

Ros a Mhíl

A Strategic Hub for the Development and Support of the Offshore Wind Industry on the West Coast of Ireland

September 2021

## EXECUTIVE SUMMARY

### Client

Údarás na Gaeltachta is the regional development authority for the economic, social and cultural development of the Gaeltacht with the overall objective of maintaining Irish as the communal language of the region. Further information can be obtained on [www.udaras.ie](http://www.udaras.ie).



### About this Report

**Date of Issue:** September 2021

**Lead Author:** Dublin Offshore

**Project Team:**

Scenario Creation & Enterprise Strategy – Lumen Energy & Environment.

Environmental Analysis – ITP Energised.

Economic Analysis – BIGGAR Economics.

The Project Team authored this report based on an impartial analysis of primary and secondary sources, including stakeholder consultation. The Authors would like to thank everyone that has contributed their time and expertise during the preparation and completion of this report. Special thanks go to Údarás na Gaeltachta and the Stakeholder Advisory group whose input and feedback were invaluable in completing this report.

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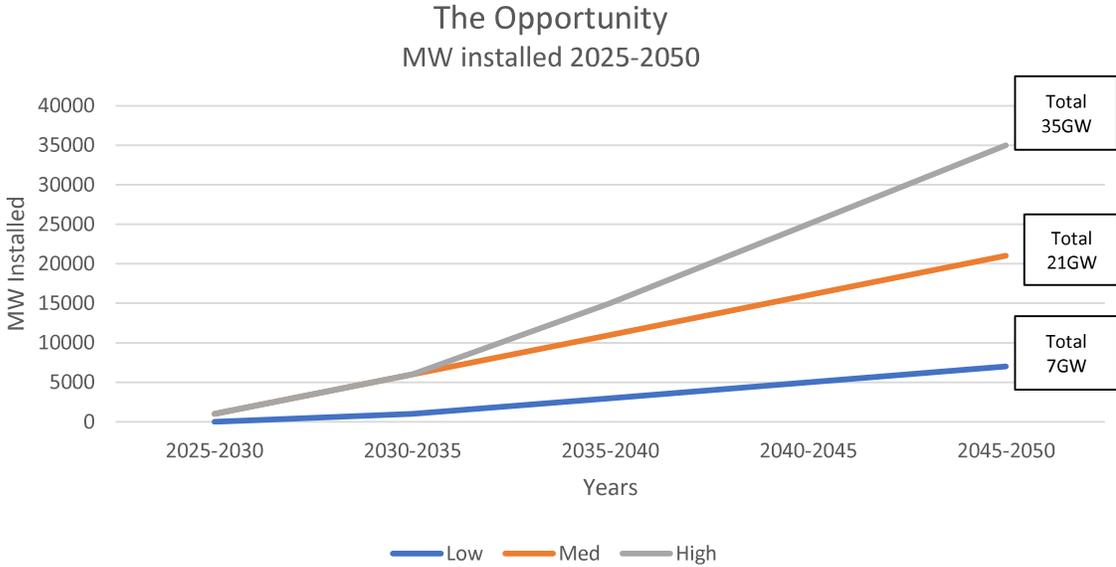
**EXECUTIVE SUMMARY**

**Opportunity and Context**

This report assesses the Technical, Environmental and Socio-Economic opportunities and constraints for Ros A Mhíl port considering the proposed development of Floating Offshore Wind (FOW) on the west coast of Ireland. The analysis may be used to guide decision making by all stakeholders in the long-term development of infrastructure and facilities to meet the targeted FOW market segment requirements.

Ireland has made a strong commitment to the growth of offshore wind, and environmental conditions, particularly on the west / Atlantic coast are better suited to Floating Offshore Wind Platforms – a rapidly emerging market beginning to scale up over the next decade. However, Ireland will require port and infrastructure investment to capitalise on the environmental and economic benefits from the construction and operation of new generation assets.

The Programme for Government ‘Our Shared Future’ aims to take advantage of the “at least 30 GW of offshore floating wind power” off the Atlantic coast by 2050. Offshore Renewable Energy Development Plan (OREDPlan) outlines the possibility of 27 GW of floating wind in Irish waters (7GW on the West Coast region closest to Ros a Mhíl). In order to predict which capacity in MW will be installed and require port facilities on the western seaboard, Low, Medium & High scenarios have been created with indicative installed capacity (MW) per 5-year window.



It should be noted that the Low scenario will require grid reinforcement along the west coast given existing grid capacity constraints, the high scenario requires both major grid reinforcement as well as other uses for electricity produced by floating wind, such as the production of Hydrogen, integration to a super grid and other e-fuels like Ammonia for shipping.

## EXECUTIVE SUMMARY

Ros a Mhíl has the potential to play an important role supporting the significant pipeline of Floating Offshore Wind on the West Coast of Ireland. Its combined attributes of proximity to offshore project locations and consented 12m deep berth provide the opportunity for cost effective and timely entry into the offshore energy market for the Port. The significant economic activity associated with offshore construction and wind farm operations may be realised through long term employment opportunities local to the Port and within the region.

This analysis highlights risks and opportunities for Ros a Mhíl both as an Operations and Maintenance (O&M) port and as a base for Assembly activities during floating offshore wind development.

## Target Market Scenarios

The following potential scenarios were defined and assessed as part of the analysis.

**Scenario 1:** defines a port that can be used as a quick reaction port for Operation & Maintenance of a FOW project, the port would include an O&M office facility for technicians and control centre for the operation of the windfarm. Technicians would access the wind farm from the port using service operation vessels, crew transfer vessels and helicopters.

**Scenario 1a:** defines a port that can act as a quick reaction O&M Port, but with the additional facilities and requirements to be able to store and deploy certain, smaller components required during the construction of a FOW project, this could include mooring chains & anchors.

**Scenario 1b:** defines a port that can act as a quick reaction O&M Port, but also act as a centre for major maintenance repairs, with the additional facilities and requirements to be able to store and deploy some of the larger components (mooring systems, cables etc) required during the construction of a FOW project.

**Scenario 2:** defines a 'cluster port', i.e. a port large enough to host Pre-fabrication, Assembly, wind turbine staging; all construction related activities as well as a full Operation & Maintenance service (quick reaction & major repairs).

## Key Findings

- The development of Ros a Mhíl as a support port for the floating offshore wind sector would represent a major opportunity for the Galway Gaeltacht and the wider economy. Early signs of market intent for offshore wind in the region have been demonstrated by Green Investment Group's recent acquisition of the 400MW Sceirde Rocks offshore wind farm.
- Each of the scenarios outlined require additional investment in the port to become fit for purpose for all users (i.e. fishing, tourism, ferry and offshore renewables). The variation in port investment costs between €17.4M and €170.5M for operational scenarios indicates the importance of clearly identifying the targeted market segment the Port intends to service and developing infrastructure in close alignment with the industry requirements.
- Ros a Mhíl does not currently have suitable infrastructure to support large scale construction & assembly activities, and will require channel dredging, quay extension, and land redevelopment work to do so.
- O&M port selection is more geographically sensitive to location than construction phase activities. Ros a Mhíl is well positioned to compete as O&M port to wind farms from Loop Head to Belmullet.
- A focus on use of the Port only for Operations and Maintenance offers the best Cost Benefit Ratio of modelled scenarios, but the lowest Gross Value Add (GVA) benefit to the Galway Gaeltacht.
- A focus on use as an Assembly port offers similar Cost Benefit Ratio, and significant GVA benefits, compared to O&M only. However, as stated above significant marine and onshore works are required.
- Project construction activities offer economic activity earlier than O&M. Ros a Mhíl will lose their first mover advantage if progressing an O&M only strategy should adjacent ports in the region develop capability to service the construction phase first. An investment decision prior to expiration of existing planning permission is key.
- Scenario 2 requires significant additional investment in order to open up the port to a wide range of manufacturing, and assembly and operational activities. However, it does not deliver a significant additional GVA benefit compared to Scenario 1b.

**Key Consideration :** While all options are available to Ros a Mhíl, the potential to provide O&M plus Assembly support as captured in Scenario 1b is of particular interest for the reasons outlined above. Based on servicing 3GW of projects, which is less than half of the Low FOW deployment scenario, this has the potential to result in up to 900 direct and indirect jobs for the region.

**EXECUTIVE SUMMARY**

**Summary Scenario Outcomes (per 500MW Project)**

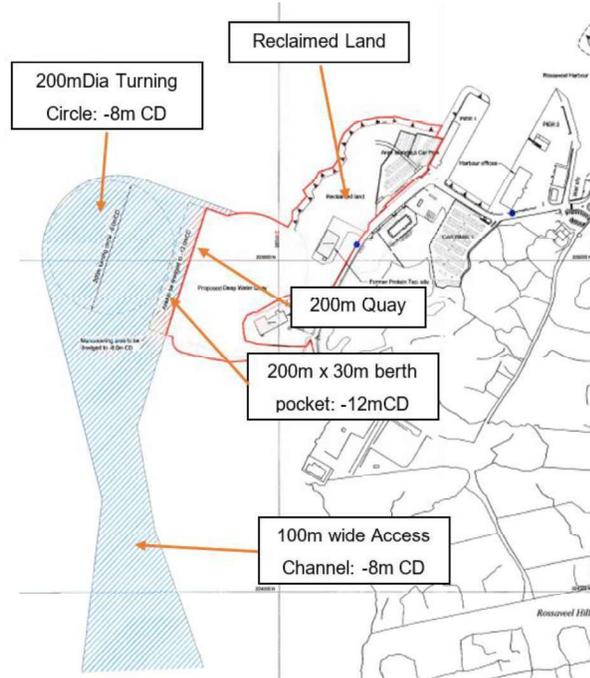
	Scenario 1	Scenario 1a	Scenario 1b	Scenario 2
Description	O&M quick reaction for 1 x 500MW project	Scenario 1 plus ancillary construction support	Scenarios 1a & Staging / Assembly	Cluster port
Port Investment Cost (€m) (Fixed Cost)	17.4	24.6	54.5	170.5
GVA (€m) – Galway Gaeltacht (per 500MW Project)	103.5	105.4	321.3	389.1
Benefit Cost Ratio (per 500MW Project)	5.95	4.28	5.90	2.28
Consenting Assessment	Minor	Minor	Significant	Significant
Environmental constraints	Low	Low – Medium	Medium-High	Medium - High
Risk	Low risk option in terms of least cost route to port utilisation. However will prevent port infrastructure development that secures wider economic benefit. Utilisation depends on the construction of a wind farm near to port and timing of O&M contracts	Scenario offers low Benefit Cost Ratio, as requires investment to be viable, but additional GVA benefits in comparison to Scenario 1 are small. Significant on-shore ground preparation and development required.	Significant marine and land development required. Under low deployment pathway scenarios there is risk of under contracting the Port. In addition, this option has greater environmental impacts and associated consenting risks.	Significant marine and land development required. Additional investment comes with high risk of securing additional port activity. In addition, this option has greater environmental impacts and associated consenting risks.
Opportunity	O&M contract opportunity offers stable long term benefit over life of the wind farm. Opportunity to develop multi use port to enhance existing port activities such as fishing.	Allowing additional activities and benefit beyond O&M (though the additional GVA benefits are not significant). Opportunity to develop multi use port to enhance existing port activities such as fishing.	West coast of Ireland does not yet have suitable assembly port facilities. In medium-high deployment scenarios, a multi-port strategy will be required. Opportunity to develop multi use port to enhance existing port activities such as fishing.	Opportunity to benefit from a clustering effect over time, as has been seen in locations such as the Humber on the east coast of England.

EXECUTIVE SUMMARY

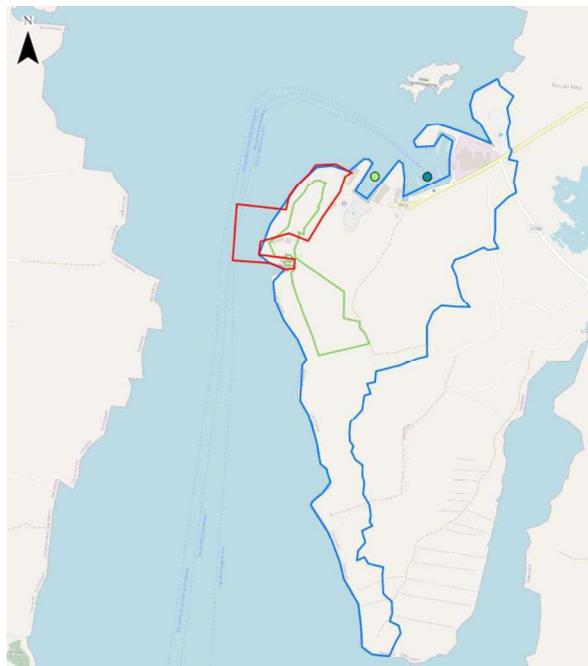
Ros a Mhíl

Ros a Mhíl does not currently have the capacity to support large scale offshore construction activities. However, planning permission granted to the Department of Agriculture, Food and the Marine (DAFM) in 2018 for a 200m deepwater quay provides opportunity to develop the necessary onshore infrastructure. Ros a Mhíl is unique among ports on the Irish west coast in having existing permission for infrastructure with the potential to support the FOW project pipeline.

The Port currently supports ferry, fishing and leisure activities with the existing harbour. The proposed additional development must consider existing port users, and infrastructure specifications are to be progressed in-line with the target market requirements and stakeholders needs.



Ros a Mhíl consented infrastructure



Land ownership in Ros a Mhíl. Planning boundary in RED. Údarás owned land in GREEN. DAFM owned land in BLUE

Ros a Mhíl benefits from a significant land bank adjacent to the proposed 12m deep-water berth, under ownership of both Údarás na Gaeltachta and DAFM. The available land supports direct access to quayside and provides growth potential for servicing significant project cargo throughput, in addition to office and workspace.

The dual functioning of the existing harbour activities and FOW support activities at the proposed development would be achievable through detailed design of the new facility footprint, and project specific logistics planning.

Its combined attributes of proximity to offshore project locations and consented 12m deep-water berth infrastructure provide the opportunity for cost effective entry into the offshore energy market for the Port.

**EXECUTIVE SUMMARY**

**Suitability of Consented Infrastructure**

The consented infrastructure has a high level of suitability for re-purposing the development in service to the FOW industry. The quay length, berth depth and onshore landbank provide capacity for many of the anticipated O&M and cargo handling activities. The potential of the facility to directly service FOW platforms within the Port is constrained primarily by the Access Channel depth and the footprint of the deep pocket. Market segments within FOW which do not require platform access to quayside have also been identified as having a high Benefit Cost ratio relative to the investment required.

Consented Facility Traits				Yes	Requires Clarification	No
1	1a	1b	2	FOW Support Activity		
✓	✓	✓	✓	Service Operation Vessel home port.		
✓	✓	✓	✓	Crew Transfer Vessel home port.		
✓	✓	✓	✓	Project Cargo Vessels: Lo-Lo		
✓	✓	✓	✓	Anchor Handling Vessel		
		✓	✓	Platform Assembly and Deployment Support		
		✓	✓	Platform O&M Support		
		✓	✓	Permanent crange for RNA operations: Quayside Crane.		
		✓	✓	Temporary crange for RNA operations: Crawler Crane.		
		✓	✓	Crange for RNA operations: Jack-Up Barge (JUB) alongside		
		✓	✓	Onshore Space Requirements	Quay Deck Set Down Area: Space required for close storage of cargo for timely assembly of WTG at quayside.	
		✓	✓		Blades: (3-unit racking)	
		✓	✓		Nacelles	
		✓	✓		Tower	
	✓	✓	✓		Anchors	
	✓	✓	✓		Chain	
	✓	✓	✓		Synthetic Line	
	✓	✓	✓		Mooring Jewellery: Buoys, clump weights, load reduction components etc	
	✓	✓	✓		Electrical Array Cable	
✓	✓	✓	✓		RNA Components	
✓	✓	✓	✓		O&M Centre	
✓	✓	✓	✓		Helicopter Access	
✓	✓				Access Channel: -7m CD, 100m Width	
✓	✓				Access Channel: -8m CD, 100m Width	
		✓		Access Channel: -9m CD, 100m Width		
			✓	Access Channel: -12m CD, 100m Width		
✓	✓			Turning Circle: -7m CD, 200m Diameter		
✓	✓			Turning Circle: -8m CD, 200m Diameter		
		✓		Turning Circle: -9m CD, 200m Diameter		
			✓	Turning Circle: -12m CD, 200m Diameter		
		✓	✓	Wet Storage: Galway Bay		

**EXECUTIVE SUMMARY**

**Environmental Constraints**

The key aims of this study were to identify:

1. If the scenario is covered under the existing planning permission and/or if additional environmental impacts to those identified in the EIS were expected.
2. If additional impacts are expected, what are they and what additional assessments and/or consents, if any, would be required.
3. Rank each scenario using a traffic light system (i.e. low, medium and high environmental and consenting risks) to determine the environmentally preferred scenario.

The assessment identified potential constraints and consenting requirements associated with each development scenario and provides recommendations for further investigations, where relevant. It does not guarantee that no other barriers to planning or development will be identified during further investigative work. Scenario 1 would result in the fewest additional impacts and consenting requirements whilst Scenario 2 would have the most. Scenario 1b would have similar additional impacts to Scenario 2.

Topic		Scenario 1	Scenario 1a	Scenario 1b	Scenario 2
Ecology	Terrestrial	Low	Medium	Medium	Medium
	Marine	Low	Low	High	High
	Designated sites	Low	Low	High	High
Landscape and visual		Low	Low	Medium	High
Geology and water resources		Low	Low	Low	Medium
Cultural heritage		Low	Low	Low	Medium
Noise	Terrestrial	Low	Medium	Medium	Medium
	Marine	Low	Low	High	High
Other marine users	Shipping	Low	Low	Low	Low
	Fishing	Low	Low	Low	Low
	Offshore wind	Low	Low	Low	Low
	Energy test sites	Low	Low	Low	Low
	Aquaculture	Low	Low	Low	Low
Transport and access		Low	Low	Low	Low
Aviation		Low	Low	Low	Low

## Socio-Economic Benefit

Investment in Ros a Mhíl has the potential to lead to the creation of highly skilled permanent jobs within the Galway Gaeltacht for every farm serviced by the port. The forecasted national pipeline of projects is up to 35GW by 2050, and therefore multiples of these job numbers may be achievable subject to the pace of project deployments.

If the port were to target servicing 3GW (6 x 500MW) of wind farms it could lead to the creation of up to 366 - 1080 O&M jobs within the Galway Gaeltacht, this would account for under half of the 7000MW total predicted pipeline of projects to be installed by 2050 under the low deployment scenario.

500MW Job Creation Opportunity					
Criteria		Scenario 1	Scenario 1a	Scenario 1b	Scenario 2
Direct Jobs by Area	Galway Gaeltacht	54	54	134	160
	County Galway	63	63	23	23
	Rest of Ireland	147	147	107	81
Indirect Jobs by Area	Galway Gaeltacht	7	7	16	20
	County Galway	15	15	12	13
	Rest of Ireland	122	122	116	111
Total Jobs by Area	Galway Gaeltacht	61	61	150	180
	County Galway	78	78	35	36
	Rest of Ireland	269	269	223	192
Total Ireland per 500MW		408	408	408	408

For Scenario 1b, by servicing 3GW, which is only 10% of the Programme For Government targets, the port of Ros a Mhíl would create 900 permanent jobs within the Galway Gaeltacht. This development has the potential to support retention of the local population and return of regional emigrants within the area.

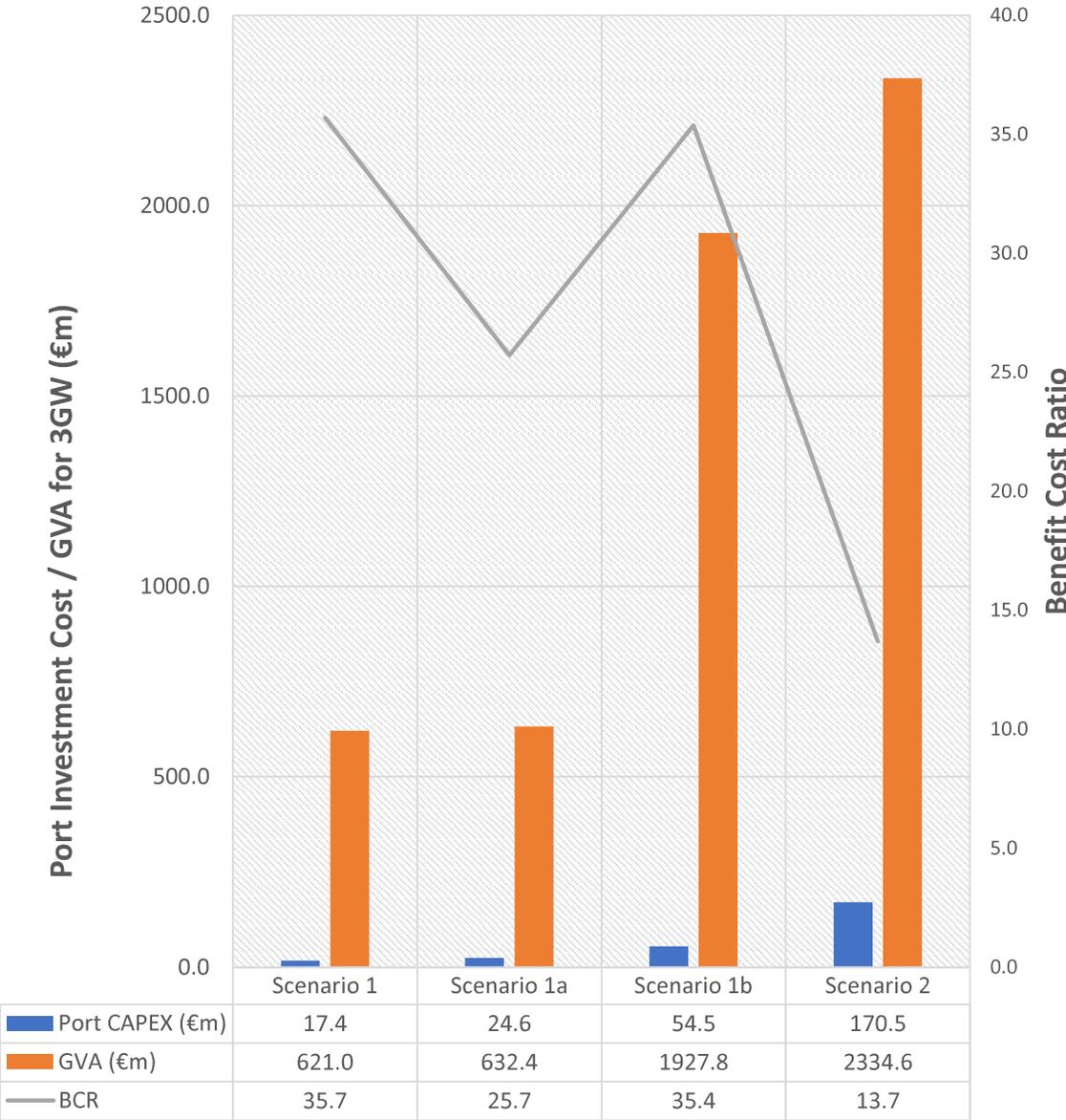
Each of these scenarios will rely on additional investment in the port. The variation in port investment costs between €17.4M and €170.5M for operational scenarios indicates the importance of clearly identifying the targeted market segment the Port intends to service and developing infrastructure in close alignment with the industry requirements. A key decision is related to the investment required to enable platform access directly to quayside, and the impact on dredge volumes and CAPEX associated with the necessary navigable water depths. Bringing platforms alongside, as considered in Scenario 1b and Scenario 2, allows for step changes in the GVA delivered for the region, but with significant impact

**EXECUTIVE SUMMARY**

for cost, planning and logistics. The role of cranning, given the cost and supply issues for cranes sizes required for FOW, is key to establishing the most beneficial role for the Port. Cost effective pathways to initially deliver least-cost support options, potentially followed by future upgrades to realise the greater economic benefit of increased capability, may be worth detailed consideration in advance of investment.

Summary of Costs & Benefits based on 3GW O&M activities (achievable even within the low roll out scenario) to 2050 is given in the following table. It's important to note that while the investment costs are fixed the GVA outlined per 500MW is factored by the project capacity secured by Ros a Mhíl port.

**Summary of Costs & Benefits based on 3GW to 2050**





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## Appendix 5

### Submission from Fuinneamh Sceirde Teoranta (FST)

Fuinneamh Sceirde Teoranta (FST), a Galway Gaeltacht-based firm, began developing the Skerd Rocks Offshore wind farm project off the Galway coast in 2001. Given the at times uncertain policy environment, the project is still in the development phase. However, the Government's Climate Action Plan has transformed that environment into an aggressive policy in favour of offshore wind. FST's project was fortunate enough to have kept going regardless, submitted a Lease application in 2008, a grid application in 2011 and was ultimately designated a 'Relevant Project' by Government in 2020.

Under the new process to be established on enactment of the MAP Bill, the project will need to resume its full consenting process and will also need to participate in the Government's proposed Offshore Renewable Energy Support Scheme (ORESS) in the not too distant future. Its grid application is being processed. Assuming success in all of the above, it could be envisaged that the project would move from development to construction sometime over the next 5 plus years, making it one of the largest ever investments in a Gaeltacht area.

Such a large project would require considerable infrastructure and installation equipment. Marshalling the very large turbine and foundation components, as well as an offshore transformer station and cabling, is likely to require a large quayside area at a deep water port, such as that being considered at Rosaveel, not to mention berthing for the jack-ups, cranes ships, cable-laying vessels & other marine vessels likely to be involved in the installation. The nearest alternative would seem to be Galway Harbour, though that is a lot further away from site. The smaller operation and maintenance (O&M) vessels and possibly helicopters could be accommodated at various sites around the area, some nearer to the site than Rosaveel, but of course no decision of any kind has been taken on any of these matters so far. Rosaveel would also seem to be a good location for the local HQ for the project, given its proximity to the site, while also having ready access to the motorway system the other side of Galway City. Clearly there would be hundreds of people involved in installation which could stretch over some years, with a smaller contingent permanently employed for the ongoing O&M over the subsequent 25 to 30 years.

2<sup>nd</sup> Dec 22

**MWP**

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Appendix 9.2  
FHC Businessplann and  
Rossaveel Masterplan  
Reports



**McIver Consulting**

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**DEPARTMENT OF AGRICULTURE, FISHERIES AND FOOD**

**DEVELOPMENT OF BUSINESS PLANS FOR THE FISHERY  
HARBOUR CENTRES**

Prepared by

**Raymond Burke Consulting and McIver Consulting**

25 February 2009

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# 1. Introduction

## 1.1 Overview

Raymond Burke Consulting (RBC) and Mclver Consulting (MCI) were commissioned in mid July 2007 by the then Department of Communications, Marine and Natural Resources to prepare a Five Year Business Plan for each of the Department's six Fishery Harbour Centres (FHCs).

The Business Plans are to provide a roadmap for maximising fish and fish processing opportunities, establish business development priorities and, where appropriate, promote marine-related activities and the development of leisure or amenity facilities thereby facilitating and promoting the social or economic development of the area.

The purpose of the Business Plan is to enable each of the FHCs to work to clear, strategic objectives.

## 1.2 Terms of Reference

The Consultants are required to prepare an overall comprehensive Business Plan (BP) for the six<sup>1</sup> Fishery Harbour Centres (FHCs). Within this overall Plan, individual BPs are required for each designated Fishery Harbour Centre.

The Business Plan is to cover management's medium-term vision for the FHCs and the goals to be achieved over the next five years to realise this vision. It will identify the strategy to be followed to reach these goals, and recommend a detailed plan of action for the next five years to implement the strategy. The Business Plan will need to focus on ensuring the efficient and safe operation of the FHCs, while ensuring compliance with statutory requirements.

There is substantial scope for increasing fishing activity operating out of Irish fishery harbours. Our geographical location provides an opportunity to attract a much greater proportion of EU landings and downstream activity through the fishery harbour centres.

A key policy objective is therefore to develop the infrastructure, operational efficiency and range of supply and support services at the FHCs with a view to maximising the levels of economic activity and returns from these facilities.

The Business Plan will establish business development priorities for the FHCs. It will provide a roadmap for maximising opportunities in fishing, marine related leisure,

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<sup>1</sup> At the time of tender, there were only five Fishery Harbour Centres. Following its designation as a Fishery Harbour Centre in May 2007, Dingle was included in the list of FHCs for which a Business Plan was to be prepared

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amenity and commercial activities, which promote the social or economic development of the area in which the FHCs are located. Due regard will have to be given to the fact that these are working fishery harbour centres and that they contribute significantly to the vibrancy of the local economy. The Business Plan should also enable management to benchmark progress in achieving goals.

The Business Plan will comprehensively cover the overall operation of the FHCs in general while incorporating the operation of each individual FHC as a separate entity including:

- Assessment of FHCs existing facilities
- Assessment of strengths, weakness, opportunities and threats to the FHCs
- Identification of FHCs competitive advantages
- Development of business expansion options
- Development of a marketing strategy
- Financial modelling of business opportunities

### **1.3 The Six Fishery Harbour Centres**

The six Fishery Harbour Centres are: -

- Howth, Co. Dublin
- Dunmore East, Co. Waterford
- Castletownbere, Co. Cork
- Ros an Mhíl, Co. Galway
- An Daingean (Dingle), Co. Kerry
- Killybegs, Co Donegal

These harbours are managed and operated in accordance with the Fishery Harbour Centres Acts 1968 (as amended). This Act provides for the establishment and operation of these harbours to promote, develop and carry on sea fishing, fish processing, fish related activities and matters connected with the fish industry as well as any other purpose, including the provision, improvement and development of leisure or amenity facilities or for facilitating or promoting the social or economic development of the area in which the Fishery Harbour Centre is located.

The 1968 Act was amended in 1998 to broaden how properties owned by the State could be used.

The Minister for Agriculture, Fisheries and Food now has overall responsibility for the development of infrastructure at the Fishery Harbour Centres and for the leasing of property within the harbours. The responsibility was transferred to this Department on 19 October 2007. The Harbours are managed via a statutory fund, known as the Fishery Harbour Centres' Fund, which the Comptroller & Auditor General audits on an

annual basis. Sea Fisheries Administration Division (SFAD) of the Department of Agriculture, Fisheries and Food, which is based in Clonakilty, Co Cork, is responsible for the line management of these fishery harbours, including the overseeing of this tender.

## 1.4 Activity

### 1.4.1 Landings

In 2007, the six harbours in question had landings from Irish registered vessels of over 125,000 tonnes with a value of over €92 million. Overall, the catch was almost 262,000 tonnes, a decrease on the 2007 national landings of 272,000 tonnes.

The volume of overall foreign landings was some 31,381 tonnes valued at €46 million.

Table 1.1: The Irish Fishery Sector 2007

FHC	Irish Fleet		Foreign Fleet		Total	
	Catch Tonnes	Value €'000	Catch Tonnes	Value €'000	Catch Tonnes	Value €'000
<i>Killybegs</i>	89,262	42,096	19,259	12,591	108,521	54,687
<i>Dunmore East</i>	8583	14,277	8	0	8,591	14,277
<i>Ros an Mhíl</i>	3,738	11,338	0	0	3,738	11,338
<i>An Daingean</i>	5,114	4,906	2,669	8,576	7,783	13,482
<i>Castletownbere</i>	14,719	13,331	8,129	23,188	22,848	36,519
<i>Howth</i>	3,935	6,176	1	0	3,936	6,176
<b>Sub-Total</b>	<b>125,351</b>	<b>92,124</b>	<b>30,066</b>	<b>44,355</b>	<b>155,417</b>	<b>136,479</b>
<i>Other Harbours</i>	105,158	88,222	1,315	1,829	106,473	90,051
<b>TOTAL</b>	<b>230,509</b>	<b>180,346</b>	<b>31,381</b>	<b>46,184</b>	<b>261,890</b>	<b>226,530</b>

Source: SFPA

Notwithstanding the increase in fuel prices which have now reduced and the reduction in some fishing quotas, the industry continued to invest in renewal and upgrading. In 2006, this investment included the introduction of 23 new and second-hand vessels into the fleet.

### 1.4.2 Decommissioning

Following agreement with the Department of Agriculture, Fisheries and Food and State Aid approval by the European Commission, the 2008 scheme to permanently withdraw capacity from the whitefish sector of the Irish fishing fleet was formally launched by the Minister of Agriculture, Fisheries and Food, Mary Coughlan T.D. in February 2008.

A total of 71 applications were received. Forty-six of these vessels accepted decommissioning grants with a total of 6909 GT and 19,000 Kw

being removed from the register. The total payout for decommissioning in 2008 was €21m.

### **1.4.3 Fish Quotas**

The December 2008 negotiations on fish quota secured 37,421 tonnes of whitefish quotas for Ireland for 2009, which is an increase of 4% on 2008 levels. This was a significant success given that the initial proposal involved cuts of between 25% and 15% for most of the whitefish stocks of importance to Ireland.

The Commission proposed a closure of all whitefish fishing in the waters off Donegal. Following intense negotiations a package of measures were agreed that both delivered strong conservation measures for the cod, whiting and haddock stocks in decline while facilitating the continuation of important fishing activities for the Irish fleet.

In addition, the pelagic quota was set at 136,635 tonnes which is an increase of 8% on 2008 levels. An increase of 33% was secured for mackerel and a roll over of the Horse Mackerel quota 40,500 tonnes. These stocks are the economic drivers of the pelagic fleet and will coperfasten the future viability of this part of the Irish fleet.

Due to the poor state of the herring stocks total allowable catches for these stocks were reduced, Irish fishermen brought forward a Rebuilding Plan for the important Celtic Sea herring stock which was adopted by the Commission.

Total value of quotas is up by 5% from €194m in 2008 to €202m in 2009. This gives Irish vessels total quotas of 183,000 tonnes to utilise in 2009.

### **1.4.4 Policy**

The national policy on delivering a profitable, efficient and sustainable fishing sector is set out in the Cawley Strategy – Steering A New Course. The strategy was as a result of an independent review chaired by Dr. Noel Cawley, working with Mr. Joey Murrin and Mr. Ruain O’Bric and together they engaged in a set of intensive discussions around the coast with fishermen, fishing communities and all of the other players in the sector. Their expert recommendations are being delivered and progress is being monitored through an Implementation group chaired by Dr Cawley. The implementation group incorporates the Federation of Irish Fishermen and it has held a series of meeting to progress the effective implementation of the strategy. The strategy focused on a number of key areas – the restructuring of the fishing fleet to bring it into balance with available resources, a more innovative and co-ordinated approach to the marketing of seafood capitalising on its healthy

and nutritious image and maximising the value of seafood at every stage from the sea to the table. The Government has committed to this strategy in the Programme for Government and has provided for its implementation in the National Development Plan 2007 – 2013.

### **1.4.5 National Development Plan 2007 - 2013**

Some €203 million has been identified for investment under the Fisheries and Coastal Infrastructure Sub-Programme to provide for the future viability of the fishing industry, to bring the Fishery Harbour Centres up to international practice, to reduce congestion at the harbours and to improve safety for the fisheries sector.

### **1.4.6 The Broader Sea Fisheries Sector**

In its 2007 end-of-year statement of review for the Irish seafood industry, Bord Iascaigh Mhara noted that, despite another challenging year, 2007 saw demand increase for quality Irish seafood, with estimated total sales worth €803 million, up 6% on the 2006 figure (€778 million).

Provisional figures reveal that the Irish retail and foodservice market for seafood continued to show growth with domestic seafood sales to the retail sector increasing by 7% to €169 million while sales to the foodservice sector increased 5% to €213 million.

In 2007, Irish seafood exports had an approximate value of €360 million, similar to 2006, with France accounting for 24% of total exports (€85 million), while the second most important destination for Irish seafood was the United Kingdom with €68.6 million of seafood exports.

Further afield, pelagic exports to Nigeria increased 120% in volume and 80% in value to almost €10 million. There was also a lift in trade to Egypt with seafood exports worth approximately €7 million.

During 2007, total grant aid for the fishing fleet and sea fisheries was provided to a total of 1,036 projects. This included a scheme to support vessel owners to upgrade to more environmentally-friendly fishing gear and fuel monitoring equipment as well as a programme for vessels to upgrade their onboard quality through the purchase of special freezers and ice making machines. A fishing vessel safety scheme enabled vessels to improve their safety equipment while five new sea angling/marine tourism vessels were completed in 2007 with grant-aid of more than €330,000 paid on an investment of €860,000.

Also in 2007, under the Sea Fisheries Supporting Measure, grant-aid of €3 million was paid to nineteen projects that promoted the sustainable development of Ireland's sea fisheries industry at sea and ashore, and

supported its diversification in the coastal regions from a total committed figure to date of nearly €24 million.

The decommissioning scheme was launched on 20<sup>th</sup> February 2008. This scheme will deliver on the commitments for fleet restructuring contained in the Programme for Government with €42 million committed to fund this scheme in 2008 and 2009.

### **1.5 Approach**

Our approach to the preparation of the Business Plans was as follows:

- We commenced the engagement with a Mobilisation Meeting with Department officials at Clonakilty to receive a briefing on each of the Fishery Harbours, discuss the approach to be taken, the interview programme and the conduct of the consultation process
- We then prepared a Briefing Note for each of the Harbour Masters and their key stakeholders in advance of our visits to the six harbours. The Briefing Note set out our Terms of Reference, the approach that we are taking and the information that we sought from them
- Each harbour was visited where meetings were held with harbour-based staff, Department officials based in Clonakilty and engineers, and key stakeholders. We also attended User Group meetings where these have been established. Follow-up meetings and discussions were held where required
- We also had discussions with and met a range of third parties, interested groups and representative organisations
- On the transfer of the fishery harbour function to the Department of Agriculture, Fisheries and Food, the Department issued a Press Release about the assignment and seeking submissions. We took the opportunity to use this Press Release to publicise our consultation process
- As part of the development of the overall Business Plan, we prepared profiles of each of the harbours that were checked by the individual harbour masters
- Significant desk research and a literature review were carried out as a prequel to the analysis of the sector and the writing of the Business Plans
- We agreed a common template for each of the Business Plans
- Outline catch, revenue and expenditure projections were prepared for each of the Fishery Harbour Centres
- We had an interim meeting with the Department to present our findings and outline proposals
- We prepared a draft report for consideration by the Department
- Following a meeting with the Department, the Report was updated as required and signed-off
- On an ongoing basis, we kept the Department advised of how the study was advancing, the issues arising and presented them with regular progress updates

### **1.6 Key Findings**

Some of the key findings that arose during this assignment include:

- The FHCs are strategically located for the landing of fish caught in European waters

- The FHCs benefit from the support of the State's professional, technical, administrative and financial resources in the carrying out of their roles
- The FHCs are engines of local economic activity and development in the rural areas that they are based; for many communities, they play an important social role
- The User Group meetings are seen as an excellent opportunity to discuss local issues, share concerns and for participants to be advised of proposed developments; stakeholders believe that a partnership approach should be the way forward
- Equally, the relationships between tenants and the Department, particularly in relation to dealing with leases, are considered frustrating
- Although relationships are good at a personal level, there are potential structural difficulties arising from separate administrative and engineering functions
- There is a lack of a business focus by FHC officials with little marketing and commercial activity and involvement by the FHCs
- The management of the FHCs should undergo training with a view to acquiring the relevant leadership skills, expertise and competencies. Up-to-date job descriptions should be developed and there should be an appropriate management development programme put in place for them
- With landings static from the Irish fleet driven by quota limits, there is an opportunity to grow landings by attracting an increased number of foreign vessels
- In addition, there is a need to broaden the activity base of the Harbours; within that context, satisfying the demand for marine leisure facilities including marinas is generally seen as an exciting and rewarding opportunity
- The development of the marinas at Kilmore Quay and at An Daingean shows that the fishing and the marine leisure sectors can operate in tandem
- A study funded under the Ireland-Wales Interreg Programme found that the average spend per berth on maintenance, chandlery, fuel, personal protective equipment (PPE), clothing, insurance, marina berthing fees and training ranged between €7,787 and €11,011 per berth, and that the average spend per visitor ranged between €105 and €142 on groceries, gifts, chandlery entertainment and eating out, but not expenditure on other services such as repairs etc
- The British Marine Federation estimates that visiting boats to UK marinas contribute on average £150 (€227) each per night to the local economy. The BMF has also reported that for every £ spend on boating, there is an associated spend of £6 onshore and that every job in the core coastal marina sector supports a further 12 jobs in the local economy, through tenant businesses, suppliers and as a result of visitor and employee expenditures in the wider economy
- There are capacity deficits at some of the various harbours and Capital Expenditure funding is only agreed annually and frequently some months into the year
- A successful decommissioning scheme should make fishing more economically viable for the remaining fishermen
- The effective control of fish landings, which is the responsibility of the SFPA remains a challenge but is of critical importance to the rebuilding of fish stocks, sustainable fishing practices and the long term future of coastal communities dependant on fishing.
- Most of the FHCs have high debtor balances that need to be addressed urgently
- User charges were last updated in 2003; they should be updated on a regular basis and reflect current costs
- FHCs are working harbours; without adequate safeguards, there is potential for accidents arising from easy access to the piers and working spaces
- The absence of procedure manuals to address specific courses of action is a major

weakness

- There are opportunities to outsource a number of activities including the synchrolift and the Howth Boatyard

### **1.7 Focus of the Business Plans**

Our analysis has identified a number of key priorities. They include:

- The need for the Fishery Harbour Centres to operate to good business practice
- Development of a commercial focus and mandate, and in partnership with local stakeholders
- Raising the profile of the Fishery Harbour Centres and promoting their facilities
- Attraction of increased foreign landings to Irish fishery harbour centres
- A reorientation towards serving a multi-stakeholder customer base
- Recognition of the economic impact of maritime leisure activities
- Establishment of local budgets and performance targets
- Improved MIS for enhanced budget and performance monitoring
- Increased autonomy devolved to harbour-based management
- Induction training for new harbour management, both harbour-based and those located at Clonakilty, and ongoing management training for senior harbour-based staff

The Business Plan Vision, Objectives and Actions reflect these priorities.

### **1.8 Structure of the Report**

The structure of this Report is as follows. Following this Introduction, we present

- An overview of the various policies impacting on the operation and development of the Fishery Harbour Centres. Because of the importance of the marine tourism and leisure sectors to the Harbours, we look at the economic benefits arising
- A broad profile of the Fishery Harbour Sector in terms of the volume and value of landings, employment and financial performance. We also set out a sector SWOT analysis
- In the context of its operating environment, the key issues that we see face the sector and, from them, derive a Vision, Strategic Objectives and Values for the Fishery Harbour Centres
- The Business Plans for each of the six Fishery Harbour Centres
- The role of the Department of Agriculture, Fisheries and Food in driving the Business Plans forward, and
- In conclusion, the need for change and the benefits to be derived from it

### **1.9 Confidentiality**

On grounds of confidentiality, matters of a commercial nature discussed have not been included in this report.

**1.10 Acknowledgements**

The Consultants would like to thank the staff of the Sea Fisheries Administration Division and, in particular, Mr Paschal Hayes, Principal Officer.

We would also like to thank the respective Engineers from the Engineering Division of the Department, namely Messrs Tony O’Sullivan, Edwin Mooney, John Campbell and Gerry Egan.

The inputs of the Harbour Masters and their staff were also of considerable help. The Harbour Masters are Captain Peter Murphy, Castletownbere FHC, Captain Brian Farrell, An Daingean FHC, Captain Hugh Byrne, Dunmore East FHC, Captain Raja Maitra, Howth FHC, Captain John Donnelly, Ros an Mhíl FHC and Martin Connell, Killybegs FHC (acting Harbour Master).

We would also like to thank the many users of the various Fishery Harbour Centres who gave us their time and considered views.

Appendix 1 lists the many bodies and individuals with whom we were in contact while Appendix 2 provides details of those who made submissions.

## **PART 1: BUSINESS PLAN CONTEXT**

## 2. Policy Framework

There are three key Policy Documents and Strategies that were published recently which will influence the developments of the Fishery Harbour Centres over the next couple of years.

They are

- The National Development Plan 2007 – 2013
- Steering a New Course: Strategy for a Restructured, Sustainable and Profitable Irish Seafood Industry 2007-2013
- Tourism Product Development Strategy 2007 - 2013

Given the importance of the marine tourism sector, we conclude this chapter with consideration of the economic impact of tourism and marinas.

### 2.1 *National Development Plan 2007 - 2013*

Some €203 million will be invested under the Fisheries and Coastal Infrastructure Sub-Programme to ensure the future viability of the fishing industry, to bring the Fishery Harbour Centres up to international practice, to reduce congestion at the harbours and to improve safety for the fisheries sector.

The Plan notes that there is substantial scope for increasing fishing activities operating out of Irish harbours through exploiting our geographical competitive advantage. As energy costs increase the global fishing industry will have to change patterns of travelling long distances to fish off Ireland. In order to capitalise on location and to attract a greater proportion of EU landings our harbour infrastructure will be developed to facilitate increased landing and downstream activities at the harbours, especially at the six Fishery Harbour Centres, Howth, Dunmore East, Castletownbere, Ros-An-Mhil, Killybegs and An Daingean. Subject to feasibility and prioritisation of resources, other strategic harbours such as Greencastle, Kilmore Quay and Cromane will be developed to meet increased demands.

The current situation of many fish stocks and the need for sustainable management will continue to constrain the output from the Irish Sea Fishing Fleet. In that context, and in order to sustain the communities dependent on fishing, it will be necessary, in addition to attracting business from other fleets, to maximize the scope for diversification to marine leisure and other activities through the utilisation and development of our Coastal infrastructure. It will therefore be necessary during the Plan period to develop other industries such as aquaculture, tourism and the leisure industry to provide alternate means of employment for communities dependent on fishing. The development of port infrastructure and port service facilities will help to accommodate this.

## **2.2 *Steering a New Course: Strategy for a Restructured, Sustainable and Profitable Irish Seafood Industry 2007-2013***

In late January 2007, the Department of Communications, the Marine and Natural Resources published the new Marine Strategy "*Steering a New Course, Strategy for a Restructured, Sustainable and Profitable Irish Seafood Industry 2007-2013*".

The Strategy sets out a visionary road map towards achieving an Irish seafood sector that is sustainable, profitable, competitive and market-focused. The Strategy recommends that over €330 million of public funds should be made available to match private sector funding of €263 million to create a total investment package of €597 million for the seafood sector.

Presenting recommendations under ten core themes, the Study found that, while a buoyant and growing market for seafood exists both in Ireland and throughout key export markets, the industry is facing a range of significant challenges that must be urgently and comprehensively addressed if these opportunities are to be realised. These challenges include:

- Need for a more innovative market-focused strategy throughout the industry
- Lack of profitability, fragmentation and uncertainty of supply within the processing sector
- Imbalance between catching capacity and resource availability – requiring significant but managed industry restructuring and rightsizing
- Need for stakeholder-supported, commercially-aware fisheries management policies and procedures, based on strict compliance with quotas and other National and EU regulations
- Need for a comprehensive industry development programme supported by an appropriate regulatory framework, to encourage market-led investment to expand the aquaculture sector
- Obstacles preventing the sustainable exploitation of inshore fisheries
- Inadequate fish conservation and fishing practices, including mis-reporting, high-grading and discarding
- Need for a level playing pitch throughout the EU with respect to regulatory compliance and conservation practices.
- Need for improved relationship between the industry and the State and its policymakers/regulators.
- Fragmented representation in a fragmented industry.

It finds that the Irish seafood-processing sector is facing a range of significant challenges including reduced supplies of raw material, industry fragmentation and increased competition on key export markets. As a consequence, this sector suffers from low/declining profitability – with an increasing number of loss making companies. In order to establish a profitable, competitive and sustainable Irish seafood processing sector, the Strategy indicates that significant restructuring to the current processing configuration needs to occur, accompanied by a major performance uplift.

Enhancing competitiveness is a major objective and the strategy document notes that during the consultation processes it was maintained that the key Irish ports for landing seafood are not competing effectively, in terms of handling charges or operational efficiency, with competing alternative ports outside of Ireland. Given that it is vital to the industry's long-term development to attract as much landings of fish into Ireland as possible, both from domestic and foreign vessels, it is of paramount importance, the Strategy argues, that Irish ports can compete with the best international alternatives. Essentially, the objective should be to provide the industry with access to ports that operate commercially competitive handling charges and allow for the rapid/efficient turn-around of vessels. Continuing capital investment will be required in key fishery harbours to facilitate landings by both Irish and foreign vessels and support the local processing and service industry.

### **2.3 Tourism Product Development Strategy 2007 - 2013**

Fáilte Ireland has prepared a Tourism Product Development Strategy for the period 2007 – 2013. The Strategy notes that tourism is the largest internationally traded services sector in Ireland and is a powerful instrument of national economic development. The sector includes a wide range of diverse small and medium enterprises that are predominantly Irish-owned. Ireland experienced unprecedented growth and outperformed the rest of Europe as a tourist destination in the 1990s. However, since 2001 it has become less competitive due to a number of factors including changes in demand and customer needs and more aggressive competition from other destinations.

#### **2.3.1 The Vision for Irish Tourism**

Appropriate funding will enable the vision for Irish tourism to be fulfilled so that the industry:

- Achieves growth in market share with a higher yield;
- Has a pristine physical environment;
- Offers accommodation that is diverse in its character;
- Has key iconic attractions to entice visitors;
- Delivers a range of authentic experiences, in a friendly, engaging environment;
- Attracts investors and staff of the highest quality;
- Demonstrates and delivers continuous product innovation;
- Makes a sustained contribution to the development of the economy, especially from a regionally diverse viewpoint;
- Respects and supports Irish culture in all its diversity; and
- Provides a positive international profile of Ireland.

#### **2.3.2 Need to Speed Up the Pace of Tourism Growth**

There is a case for speeding up the pace of tourism growth based on such

facts as

- Since 1999, growth in foreign earnings from tourism has been sustained.
- There has been major progress in attracting mainland European visitors.
- Much of the growth has occurred in Dublin.
- Outside Dublin, growth has been more dependent on the domestic market.
- The next stage is about growing market share, exploiting the investment that has been made in the accommodation sector and developing the products, which will meet customers' needs.
- The sector is primarily indigenously owned, is more integrated into the economy than virtually any other sector and has out-performed all other indigenous sectors at providing employment, with the short-term exception of the construction sector.
- In the longer term, tourism has a vital role to play, especially in terms of the required development and the delivery of the National Spatial Strategy.

### 2.3.3 Product Analysis

The Strategy examines a range of tourism products; of relevance to this study are the findings in relation to Angling, Inland Cruising and Marine Tourism, which are:

#### *Marine tourism (including sailing)*

- Modern public facilities in Ireland and services for visitors are not as high as the standards commonly seen abroad.
- The visitor marina network is incomplete, particularly along the west and north-west coastline.
- There are no clear policies around planning and foreshore issues for marine tourism.
- There is a rather thin network of sailing, boating, watersports and dive centres
- There are also very few marine or water-themed visitor centres, in key strategic locations.
- There are localised shortages of sea angling and small tourism vessels.
- Viewing points or vessels for whale and dolphin watching are poorly provided compared with our neighbouring competitors.

#### *Angling*

- There has been a serious reduction in stock levels as well as water quality in recent years and this has resulted in negative publicity for the sector.
- Some overseas visitors have to get several different licenses and permits in both the Republic and Northern Ireland and this is discouraging.
- Historically, tourism and the local community have had different ways of handling the fishing resource. This has not always been in the best interest of tourism – particularly in relation to the problems associated with drift netting and the consequent reduction in stock levels.
- There are some problems with tourists getting access to inland and sea angling fisheries

*Inland cruising*

- Overseas operators say the Irish product has become 'jaded' and that it is facing increased competition from other destinations. They see it as relatively expensive compared with products in other new and developing cruising destinations.
- Many inland cruising locations lack services and many marinas are overcrowded.
- Inland cruising is vital to the Midlands economy.

In summary,

- The environment is key, and elements of it are under threat.
- The regional issue is not a simple Dublin versus 'the rest', but a more complex Dublin and urban, coastal, and inland division.
- Concentration of the general product and high quality product is mainly found in Dublin, other urban regions and along the coast.
- There are specific challenges with each of the key product components.
- There is a strong accommodation product but areas of concern have been identified. These are the traditional independent hotels, self-catering units and the B & B sector.
- The marine sector and Ireland's historic towns and cities have not yet exploited The need to invest in product in all the major locations (e.g. Dublin, Cork, Killarney, Limerick, Shannon and Galway) is vital not just to those locations but also for the country as a whole.
- State investment in key public assets is vital.
- From a tourism point of view, priority needs to be given to certain aspects of transport development, and investment needs to be accelerated.
- The cohesiveness of public policy needs to be strengthened.
- The tourism sector lacks an ethos of continuous innovation and Research and Development.

**2.3.4 Tourism Infrastructure Fund**

The development and infrastructure priorities for Irish tourism have significantly changed over time. The analysis, as earlier outlined, does not propose that the state provides further major investment in tourism facilities being provided by the private sector. However, it underlines how necessary it is to be more active in providing the required supporting public infrastructure.

Tourism needs to be brought to the forefront of policy coordination when public bodies are making decisions that will have a critical impact on tourism success. This is particularly important where environmental planning is concerned. But it also applies to the actions of groups as diverse as cultural and conservation bodies; environmental protection watchdogs; and public transport providers.

Operational supports are high priority for the future of tourism. It is also necessary to support investment in the types of tourism infrastructure that the

relevant authorities might not prioritise.

In order to get this type of development under way, it is proposed to set up a Tourism Infrastructure Fund with an average annual budget of €15 million. Fáilte Ireland would administer this fund and request public bodies to submit annual proposals for investments, which may be 100%, financed from this Fund.

Local authorities are the main providers of public infrastructure. They are the primary providers of walking and cycling facilities and they have an important role in providing water sports and some other facilities for outdoor activities. However, Local Authorities often do not have the funds to prioritise tourism needs.

The 'Tourism Infrastructure Fund' is needed to provide and maintain such facilities. This fund needs to be ring-fenced and would be for all public sector infrastructures, for example:

- Controlled access to environmentally sensitive areas;
- Signposting;
- Water based facilities;
- Marinas; and
- Leisure route development (walking and cycling particularly).

The second part of the fund, some €28 million, will be used to reinvest in facilities like:

- Walking and cycling routes;
- Moorings and jetties.

It is recommended that this fund be either administered by Fáilte Ireland, or if implemented by other agencies, that Fáilte Ireland has a primary role in allocation decision.

## **2.4 The Economic Benefits of Tourism**

### **2.4.1 Overview**

There is general consensus that harbours have a tourism benefit for the towns where they are sited:

- Tourism is a major instrument of regional development. Many tourism enterprises are situated in areas where other employment options are limited
- Local communities benefit from investment in facilities for tourists such as leisure and sporting facilities and in associated infrastructure including access transport and roads

- A vibrant tourism industry contributes to the viability and sustainability of a wide range of local enterprises
- Tourism promotes an enhanced awareness and positive appreciation of local traditions, way of life and cultural heritage

Specifically, tourist expenditure creates both temporary employment and income from the purchase of local goods and services. Service-type jobs are created in shops, gift production, and restaurants and hotels. There is also a multiplier effect where the income or wages generated from tourism is spent by residents on local services. The multiplier is estimated to be of the order of 1.43.

It is also estimated that for every Euro spent by an out-of-state tourist, 52 cent eventually ends up with the government through VAT, excise duty, PAYE etc. For every €1 million of foreign and domestic tourism revenue, there is generated an overall GNP impact of almost €950,000 after applying multiplier effects.

### **2.4.2 The Economic Value of Marine Leisure Activity**

In 2003, the Marine Institute commissioned a survey from the ESRI to establish the contribution of marine leisure activity to the national economy, and to highlight emerging trends and the potential for development of our water-based leisure resources.

The survey showed that marine leisure activity based on Ireland's marine and freshwater resources generates over €400 million in expenditure by Irish residents. Approximately 6,000 jobs are supported, directly and indirectly, by this level of expenditure. Water-based tourism accounted for 25 per cent of the domestic tourism market and generated 45 per cent of domestic tourism revenue.

The survey results showed that nearly half of the adult population participated in some form of water-based activity during the survey period. Although overall satisfaction with facilities was high, a further 10 per cent of the adult population said they would take up some marine leisure activity if facilities were better. For boating enthusiasts, poor access was a major issue particularly among those who use small craft such as row-boats and canoes.

### **2.4.3 The Increasing Demand for Marina Berths**

The demand for marina berths continues to grow, and there is a significant shortage of berths nationally. The potential demand can be gauged from the

fact that Irish boat ownership is extremely low compared with other coastal nations as shown in the following table:

**Table 2.1: Comparative Boat Ownership**

<b>Country</b>	<b>Per Capita Boat Ownership</b>
Sweden	1:7
USA	1:16
Netherlands	1:30
France	1:66
Italy	1:67
UK	1:100
Germany	1:108
<b>Ireland</b>	<b>1:171</b>

*Source: World Marine Markets*

#### **2.4.4 The Economic Value of Marinas**

A recent survey<sup>2</sup> of businesses in Dún Laoghaire, Kilmore Quay and Malahide, and carried out under an Irish Sea Marine Sector Marketing & Business Development Programme funded under the Interreg 111A project 2005-2007, found that marinas in Dún Laoghaire and Malahide had a positive impact on 34 per cent of respondents. At Kilmore Quay, some 50 per cent of businesses surveyed believed that their local marina contributed to their success.

Marinas can generate significant income from their activities in terms of local spend, employment and activity. Whether the marina is occupied by a yacht owner, a visitor or a berth owner, local businesses will benefit from the purchases of fuel, supplies and gifts. Chandler purchases and any repairs carried out will also contribute to the local economy. Most users of the marina will spend money in the town on visitor attractions, golf, meals, drink and other day-to-day requirements, and all of this spend will boost the local economy which will have a significant impact on employment and local disposable income.

The study showed that the average spend per berth on maintenance, chandlery, fuel, personal protective equipment (PPE), clothing, insurance, marina berthing fees and training, ranged between €7,787 and €11,011 per berth, and that the average spend per visitor ranged between €105 and €142 on groceries, gifts, chandlery entertainment and eating out, but not expenditure on other services such as repairs etc. This range may well be a conservative spend as the British Marine Federation estimates that visiting boats to UK marinas contribute on

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<sup>2</sup> *The Potential for Growing Marine Leisure: A Study Establishing the Scope & Opportunities for Expansion on the East Coast of Ireland*, Countryside Consultancy; Tourism Development International and Drima Marketing, November 2007

average £150 (€227) each per night to the local economy. The BMF has also reported that for every £ spend on boating, there is an associated spend of £6 onshore.

The analysis of the spend, including the secondary benefits arising from the indirect and induced impacts, for the three marinas is shown in Table 2.2.

**Table 2.2: Economic Impact of the Three Marinas**

<i>Marina</i>	<i>Dun Laoghaire</i>	<i>Malahide</i>	<i>Kilmore Quay</i>	<i>Three Marinas</i>
<b>Berths</b>	510 berths	350 berths (78% occupancy)	60 berths (15 visitor berths)	920 berths
<b>Active Berths</b>	510	273	45	828
<b>Direct Spend per Berth</b>	€11,011	€7,787	€8,815	€9,829
<b>No of Visitors</b>	814	400	1,100	2,314
<b>Average Visitor Spend</b>	€142	€105	€167	€147
<b>Visitor Spend per Berth</b>	€115,588	€42,000	€183,700	€341,288
<b>Berth Holder Direct Expenditure</b>				
<b>Maintenance</b>	€1,247,970	€374,010	€124,065	€1,746,045
<b>Chandlery</b>	€454,410	€226,590	€65,250	€746,250
<b>Fuel</b>	€798,660	€282,555	€63,000	€1,144,215
<b>PPE and Clothing</b>	€331,500	€177,450	€35,370	€544,320
<b>Insurance</b>	€868,530	€419,055	€42,570	€1,330,155
<b>Marina Berth</b>	€1,804,380	€618,891	€64,620	€2,487,891
<b>Training</b>	€110,160	€27,300	€1,800	€139,260
<b>Total Direct Expenditure</b>	<b>€5,615,610</b>	<b>€2,125,851</b>	<b>€396,675</b>	<b>€8,138,136</b>
<b>Secondary Benefits (40%)</b>				
<b>Berth Holder Spend</b>	€2,246,244	€850,340	€158,670	€3,255,254
<b>Visitor Spend</b>	€46,235	€16,800	€73,480	€136,515
<b>Total Secondary Benefits</b>	<b>€2,292,479</b>	<b>€867,140</b>	<b>€232,150</b>	<b>€3,391,769</b>
<b>Total Benefits</b>	<b>€8,023,677</b>	<b>€3,034,991</b>	<b>€812,525</b>	<b>€11,871,194</b>
<b>Estimated FTE Jobs Supported @ €50k per FTE</b>	160	61	16	237

Source: TDI

Another study carried out by the Coastal Resource Centre of UCC in early 2002 found that In the case of An Daingean Harbour, it was estimated that direct expenditure associated with marine leisure activity in the rejuvenated harbour together with associated spend from visiting boats, summer sailing courses, sail charters, diving and sea angling, generated almost €800,000 to the local economy with associated expenditure of almost €312,000. The estimated total effect of marine activities on employment in the An Daingean area is 30 Full Time Equivalent (FTE) jobs. In calculating these estimates, no account was taken of the benefits arising from the many regattas and other special events associated with the marina. An Daingean receives between 350 and 400 national and international visiting boats annually.

Rates vary from marina to marina; at this time, the rates for Dun Laoghaire Marina, the highest in the country, are as follows:

- Annual Rate per Metre €455
- Summer Rate per Metre €340
- Winter Rate per Metre €185
- Overnight Rate per Metre €4

#### **2.4.5 Financial Return to the Local Authorities**

The various County Councils in whose area the Fishery Harbour Centres are located will also benefit from any new commercial developments through rates, development levies, car parking fees etc

### **3. Profile of The Fishery Harbour Centres Sector**

In this chapter, we present a profile of the Fishery Harbour Centres (FHCs).

We commence with a brief overview of the general management of the Fishery Harbour Centres.

We then consider:

- Fish Landings by Volume and Value
- The Irish Fishing Fleet
- Employment
- Financial Performance of the Fishery Harbour Centres

concluding with an analysis of the Sector in terms of Strengths, Weaknesses, Opportunities and Threats established through our consultation programme, literature review and data analysis.

#### ***3.1 General Management, Control, Funding and Operation of the Fishery Harbour Centres***

The management, control, operation and funding of the Fishery Harbour Centres are prescribed primarily by the Fishery Harbour Centres Act, 1968.

On a day-to-day basis, the six Fishery Harbour Centres are managed by a staff of 0.5 Principal Officer, 1 Assistant Principal Officer, 1 Higher Executive Officer, 2.5 Executive Officers, 1.5 Staff Officer and 1 Clerical Officers based at headquarters in Clonakilty with staff also based in each of the six Fishery Harbour Centres. Each Harbour is managed by a Harbour Master who reports directly to the Assistant Principal Officer based in Clonakilty.

Harbour Masters are appointed a grade equivalent to a Higher Executive Officer, and are former ship masters or naval officers. They generally have little business and commercial experience when recruited.

FHCs, through the SFAD (Sea Fisheries Administration Division) now are part of the Department of Agriculture, Fisheries and Food.

In relation to payments, billing and harbour charges, details are input into the Department's SAP accounting system operated from the Department's offices at Cavan which are responsible for invoicing, payment and cash collection.

Annual budgets are prepared by the Administration with inputs as appropriate from the Harbour Master and the Engineering Division. Capital estimates are also prepared annually and are approved by the Minister early in the year in question. The Department's Capital Expenditure policy is to continuously upgrade the Fishery Harbour Centres on a rolling basis. The Department generally manages one major harbour project at a time with the capital works at Castletownbere scheduled to end in 2009.

The Fisheries Harbour Coastal Infrastructure Development Programme for 2008,

excluding grants to various small harbours under Local Authority control, is set out in Table 3.1.

**Table 3.1: Fisheries Harbour Coastal Infrastructure Development Programme for 2008**

<b>FISHERY HARBOUR CENTRES</b>	
Safety and maintenance (all Fishery Harbour Centres)	€1,750,000
Disability access (all Fishery Harbour Centres)	€270,000
<b>CASTLETOWNBERE</b>	
Dinish wharf extension	€8,000,000
RNLI pontoon	€1,000,000
Effluent treatment upgrade	€40,000
Mainland quay extension and provision of slipway	€200,000
<b>AN DAINGEAN</b>	
An Daingean harbour dredging	€40,000
Removal of old slipway	€60,000
Additional berthing pontoons	€765,000
<b>DUNMORE EAST</b>	
Harbour development project	€30,000
Harbour sedimentation/dredging study	€50,000
Repairs to East Pier – Phase 2	€350,000
Erection of safety railing/walkway	€10,000
Upgrading slipway and access to west wharf	€30,000
<b>HOWTH</b>	
Installation of powerpoints	€50,000
Upgrade of CCTV system	€15,000
Maintenance dredging of harbour	€100,000
<b>KILLYBEGS</b>	
Environmental management study	€50,000
<b>ROS AN MHÍL</b>	
Gear Store and workshop building	€600,000
Onshore works	€300,000

Source: DAFF

All non-capital expenditure, including day-to-day operations and maintenance of the FHCs, is financed from a Fund known as the Fishery Harbour Centres Fund. The Fund receives all rates, lease income, tolls or other charges paid under section 4 (b) of the Fishery Harbour Centres Act, 1968. *The Minister, with the consent of the Minister for Finance, may from time to time make, or arrange for the Commissioners of Public Works to make, grants to the Fund out of moneys provided by the Oireachtas*

Port charges, of which there are now some 23 categories of charges, are set by a Fishery Harbour Centres (Rates and Charges) Order and apply equally to all Fishery Harbour Centres. They are reviewed irregularly. The last change took place in October

2003.

Harbour masters are primarily responsible for the operation of their harbours. They have no commercial or business development mandate, and generally require the advice or permission of Headquarters for major decisions.

Maintenance of the Synchrolift is funded by the Engineering Division and maintained on its behalf by the OPW.

### 3.2 Landings

Table 3.2 presents details of landings from Irish vessels at the six Fishery Harbour Centres for the period 2001 – 2007 as well as all other harbours

**Table 3.2: Landings 2001 – 2007 (Tonnes)**

<i>Catch</i>	<i>2001</i>	<i>2002</i>	<i>2003</i>	<i>2004</i>	<i>2005</i>	<i>2006</i>	<i>2007</i>
<i>Killybegs</i>	102,934	80,595	82,862	77,765	94,988	86,868	89,262
<i>Dunmore East</i>	13,468	7,340	6,258	11,832	11,345	6,598	8,583
<i>Ros an Mhil</i>	10,422	11,759	7,672	5,304	10,611	4,635	3,738
<i>An Daingean</i>	9,106	5,906	3,952	3,161	7,513	6,322	5,114
<i>Castletownbere</i>	8,397	5,904	5,081	5,233	7,876	6,191	14,719
<i>Howth</i>	6,253	4,661	4,101	4,103	4,635	3,776	3,935
<b><i>Sub-Total</i></b>	<b>150,580</b>	<b>116,165</b>	<b>109,926</b>	<b>107,398</b>	<b>136,968</b>	<b>114,390</b>	<b>125,351</b>
<i>Other Harbours</i>	170,059	166,592	186,373	211,154	153,693	156,249	105,158
<b><i>Total Tonnes</i></b>	<b>320,639</b>	<b>282,757</b>	<b>296,299</b>	<b>318,552</b>	<b>290,661</b>	<b>270,639</b>	<b>230,509</b>
<b><i>% FHCs of Total</i></b>	<b>47%</b>	<b>41%</b>	<b>37%</b>	<b>34%</b>	<b>47%</b>	<b>42%</b>	<b>54%</b>

Source: SFPA (note: figures for 2003 – 2006 for the FHCs have been revised from those published)

There was a significant growth in landings of pelagic and demersal fish in Castletownbere in 2007 compared with 2006.

There are also landings at Irish harbours of fish from foreign vessels, primarily Spanish and French. Table 3.3 provides details of foreign landings for the six Fishery Harbour Centres for the years 2003 to 2007.

**Table 3.3: Foreign Landings 2003 – 2007 (Tonnes)**

<i>FHC</i>	<i>2003</i>	<i>2004</i>	<i>2005</i>	<i>2006</i>	<i>2007</i>
<i>Castletownbere</i>	7,051	6,289	5,570	5,241	8,129
<i>An Daingean</i>	3,451	3,869	2,811	2,495	2,669
<i>Dunmore East</i>	14	44	27	125	8
<i>Howth</i>	76	0	5	20	1
<i>Killybegs</i>	9,268	2,336	3,306	11,636	19,259
<i>Ros an Mhil</i>	42	184	161	11	0
<b><i>TOTAL TONNES</i></b>	<b>19,902</b>	<b>12,722</b>	<b>11,880</b>	<b>19,528</b>	<b>30,066</b>

Source: SFPA; 2007 landings detail are provisional

The two principal harbours attracting foreign landings are Castletownbere and Killybegs where whitefish and pelagic fish are landed respectively.

Total foreign landings at all Irish ports were 31,381 tonnes, valued conservatively at €46 million.

The waters around Ireland contains some of the most productive fishing grounds in the EU and, according to the Cawley Report, it is estimated that in 2004 the total catch by all fleets within the Irish Exclusive Economic Zone was 700,000 tonnes of fish valued at €500 million, the greater proportion of which was taken by non-Irish vessels. This reflects the Principle of Relative Stability of the Common Fisheries Policy, wherein Ireland's share (quota) of the EU Total Allowable Catch is fixed for each of the key commercial species, amounting to some 20% in the case of pelagic species, 16% of Demersal species and 23% of shellfish (Dublin bay prawns/*Nephrops*). Inshore shellfish stocks (crab, lobster, whelk, shrimp, etc.) are not subject to EU quota allocation; these stocks generated 25% of the first-point-of-sale value for the fisheries sector in 2004.

The fact that foreign fishing vessels can catch their allocated Western Water Quotas in waters close to the Irish coast and with fuel costs continuously increasing represents an opportunity to increase the level of fish that can be landed in Irish fishery harbour centres.

### 3.3 Value of Catch

In Table 3.4 we present details of the value of landings at the six Fishery Harbour Centres for the period 2001 – 2007 from the Irish fishing fleet.

Table 3.4: Value of Landings 2001 – 2007 (€000)

FHC	2001	2002	2003	2004	2005	2006	2007
<i>Killybegs</i>	38,062	32,222	30,171	21,957	27,600	33,640	42,096
<i>Dunmore East</i>	19,220	10,831	7,208	9,106	13,177	8,641	14,277
<i>Ros an Mhil</i>	16,658	14,454	12,403	9,121	12,218	6,704*	11,338
<i>An Daingean</i>	9,827	11,906	4,277	3,622	6,099	5,575	4,906
<i>Castletownbere</i>	13,297	8,777	8,418	7,889	8,456	9,682	13,331
<i>Howth</i>	15,553	13,392	7,441	6,297	6,543	6,594	6,176
<b>Sub-Total</b>	<b>112,617</b>	<b>91,582</b>	<b>69,918</b>	<b>57,992</b>	<b>74,093</b>	<b>70,836</b>	<b>92,124</b>
<i>Other Harbours</i>	137,573	142,706	143,243	209,092	107,554	132,495	88,222
<b>Total Value €000</b>	<b>250,190</b>	<b>234,288</b>	<b>213,161</b>	<b>267,084</b>	<b>181,647</b>	<b>203,331</b>	<b>180,346</b>
<b>% 6 FHCs of Total</b>	45%	39%	33%	22%	41%	35%	51%

Source: SFPA Note: the value of catch at Ros an Mhil in 2006 was recently revised to €11.1 million

### 3.4 Landings into Foreign Ports

Irish boats also land fish into foreign ports.

Details for 2002 to 2004 are as follows:

Table 3.5: Landings in Foreign Ports 2002 – 2004

	2002	2003	2004
<b>Tonnes</b>	68,802	91,985	120,040
<b>Value €000</b>	36,783	34,330	40,259

Source: CSO

Most of the landings are pelagic fish landed in Norway and Scotland, primarily on the grounds of achieving a better price than at home.

### 3.5 The Irish Fleet

Information provided by the Department indicated that there were 1,914 vessels registered on the Irish Register in early November 2007.

A breakdown of the Register is as follows:

Table 3.6: Analysis of the Irish Fishing Fleet – 6 November 2007

Segment	Number	Gross Tonnage	KW
<b>Polyvalent General</b>	1,234	36,723	120,853
<b>Of which &gt; 18m</b>	163	28,872	73,475
<b>Beamers</b>	13	1,813	6,645
<b>Of which &gt; 18m</b>	12	1,803	6,511
<b>Polyvalent Potting</b>	488	1,117	14,647
<b>Aquaculture</b>	26	4,478	10,468
<b>Beamers</b>	13	1,813	6,645
<b>Pelagic</b>	22	21,810	35,164
<b>Polyvalent Tank</b>	4	1,247	2,881
<b>Specific</b>	127	3,249	14,880
<b>TOTAL</b>	<b>1,914</b>	<b>70,437</b>	<b>205,537</b>

Source: DCENR

### 3.6 Restructuring the Irish Whitefish Fleet

In mid February 2008, the Minister for Agriculture, Fisheries and Food, and the Minister of State at the Department, launched a scheme to permanently remove fishing vessels from Ireland's fishing fleet. This voluntary scheme will remove older and larger fishing vessels with mixed catches of fish such as cod, haddock, monkfish, mackerel and herring. The scheme delivers on a key recommendation of the Strategy for a Restructured, Sustainable and Profitable Seafood Industry 2007 to 2013 – Steering A New Course also known as the Cawley Report.

The Government invested €21 million in the scheme in 2008 with a further investment committed for 2009. The Finance Bill 2008 contains a number of measures specifically designed to reduce the tax burden on fishermen taking up this scheme.

The scheme is open to vessels owners in respect of fishing vessels 10 years or more in age and 18 metres or more in overall length. Vessels must be operational at the time of decommissioning and have a recent track record of fishing. The level of

payments under the scheme are determined based on criteria including the age of the vessel and its catch history but will not exceed in any case €7,500 per gross tonne.

The scheme provides for the withdrawal of premiums (decommissioning grants), for the permanent withdrawal of fishing vessels from the whitefish sector of the Irish fishing fleet and their removal from the EU register of sea fishing vessels.

The 2007 Decommissioning Scheme sets itself the target of removing a further 11,140 GTs from the polyvalent and beam trawl segments of the whitefish fleet. This, together with the 3,178 GTs already removed from the whitefish sector accomplished during the first phase of decommissioning, represents the full programme of decommissioning recommended by the Seafood Industry Strategy Review Group and provided for in the National Development Plan 2007 - 2013.

Vessel owners who opt to remain in the industry are expected to face a more secure future and will have access to increased fish quotas to secure their financial viability.

### 3.7 **Employment**

*Steering a New Course*, the Cawley Report, provides details of employment in the fishing sector. They present the following statistics:

**Table 3.7: Employment in the Irish Fishing Fleet in 2006**

Segment	No of Vessels	Employment		
		Full-Time	Part-Time	Total
<i>Pelagic</i>	23	276	-	276
<i>Polyvalent</i>	1,650	3,320	872	4,192
<i>Beam-Trawl</i>	13	73	-	73
<i>Specific</i>	158	255	191	446
<b>Total</b>	<b>1,844</b>	<b>3,924</b>	<b>1,063</b>	<b>4,987</b>

*Source: Steering a New Course, Table 3.2, page 37*

Surprisingly, the 2006 census figures indicate that there were 1,717 people classified as Fishermen, a drop of 425 on the 1996 figures.

### 3.8 **Financial Performance**

The most recent Accounts available for the original five Fishery Harbour Centres are for the year ending 31 December 2006. Their Accounts are prepared in accordance with the relevant legislation include Receipts & Payments Accounts as well as an Income & Expenditure Account. Depreciation does not feature in any of these Harbour Accounts. **It should be noted that the 2006 figures are provisional only and have not been signed off by the Comptroller and Auditor General.**

In respect of An Daingean FHC, the most recent Accounts were prepared for Dingle Harbour Commissioners and were also for the period year ending 31 December 2006. No account is taken of the value of the main Harbour Assets, e.g. piers, in these Accounts.

The 2006 Dingle Accounts have been integrated with the five original FHC Accounts as follows other than the Table of Receipts and Payments:

**Table 3.8: Receipts and Payments Basis 2006**

€'000	Killybegs	C'bere	Ross	Howth	Dunmore	2006 Tot
<b>Receipts</b>	7,389	583	195	1,306	232	9,704
<b>Payments</b>	971	490	251	673	274	2,657
<b>Surplus</b>	6,418	94	-56	633	-43	7,045
<b>Grants</b>	21	21	21	21	21	105
<b>After Grants</b>	<b>6,439</b>	<b>115</b>	<b>-35</b>	<b>654</b>	<b>-22</b>	<b>7,150</b>

Source: DAFF

**Table 3.9: Income & Expenditure Account 2006**

€'000	Killybegs	C'bere	Ross	Howth	Dunmore	An Daingean	2006
<b>Income</b>	7,359	647	234	1,704	232	320	10,496
<b>Expenditure</b>	892	480	373	717	272	271	3,005
<b>Grants</b>	21	21	21	21	21	0	105
<b>Surplus</b>	<b>6,488</b>	<b>187</b>	<b>-118</b>	<b>1,008</b>	<b>-19</b>	<b>49</b>	<b>7,596</b>

Source: DAFF

**Table 3.10: Balance Sheet at 31 December 2006**

€m	Killybegs	C'bere	Ross	Howth	Dunmore	An Daingean	2006
<b>Fixed Assets</b>	71.5	29.7	19.3	3.6	7.5	0.2	131.7
<b>Current Assets</b>	7.8	-1.2	0.4	1.8	-0.8	0.4	8.4
<b>Current Liabilities</b>	0.1	0.6	0.0	0.0	0.0	0.1	1.0
<b>Total Net Assets</b>	<b>79.1</b>	<b>27.8</b>	<b>19.6</b>	<b>5.3</b>	<b>6.7</b>	<b>0.5</b>	<b>139.1</b>

Source: DAFF

**Table 3.11: Working Capital 2006**

€'000	Killybegs	C'bere	Ross	Howth	Dunmore	An Daingean	2006
<b>Current Assets</b>	7,779	-1,177	352	1,761	-809	444	8,351
<b>Current Liabilities</b>	133	648	5	22	47	117	973
<b>Net Current Assets</b>	<b>7,646</b>	<b>-1,825</b>	<b>346</b>	<b>1,738</b>	<b>-855</b>	<b>327</b>	<b>7,378</b>

Source: DAFF

Table 3.12: Debtor Days and Bad Debt Provision 2006

€'000	Killybegs	C'bere	Ross	Howth	Dunmore	An Daingean	2006
<b>Debtors</b>	917,487	228,309	334,604	627,914	178,223	226,000	2,512,537
<b>Debtor Days</b>	46	129	522	134	280	258	87
<b>Bad Debt Provision</b>	-13,003	8,064	127,250	85,482	18,350	N/avail	226,143
<b>Provision/Revenue %</b>	0%	1%	54%	5%	8%		2%
<b>Cumulative Provision</b>	88,381	47,359	230,288	160,963	64,372	N/avail	591,363

Source: DAFF

The Accounts show that the sector overall is viable on a day-to-day basis with the support of Government grants but that, apart from Killybegs, Howth and An Daingean, Castletownbere, Ros an Mhíl and Dunmore East do not have the current assets to fund their current liabilities and that would make them technically insolvent from an accounting perspective.

What is striking is the level of debtors that each of the FHCs has; only Killybegs has a Debtors' Days figure anywhere approaching an acceptable commercial level. The Debtors figures themselves are nett of Provision for Bad Debts that make the Debtor Days even higher.

As of mid November 2007, there was an amount of €1,608,165 outstanding for invoices in excess of 90 days. The Department's payment terms are 30 days from date of invoice.

### 3.9 Rent Income

The Department has major property banks at Howth, Castletownbere, Dunmore East and Killybegs.

The total Rent Income, according to the 2006 Income and Expenditure Account, was €1,249,109 excluding Lease Premiums, broken down as follows:

Table 3.13: Rents 2006

€'000	Killybegs	C'bere	Ros an Mhíl	Howth	Dunmore	2006
Rents	238	183	30	717	81	1,249
Of Total	19%	15%	2%	57%	6%	
Of FHC	3%	28%	13%	42%	35%	12%

Source: DAFF

The total Rent Income, according to the 2005 Income and Expenditure Account, was €572,313.

As can be seen, by far, the greatest income is generated at Howth at 42 per cent. It also forms most of that Fishery Harbour Centre's income.

### **3.10 SWOT Analysis**

A review of the FHC Sector indicates that they, in general, share a range of traits. We present these in terms of a SWOT analysis. An individual SWOT analysis for each of the FHCs is presented in the relevant Harbour analysis chapter.

#### **3.10.1 Strengths**

- The FHCs are strategically located for the landing of fish caught in European waters
- The FHCs benefit from the support of the State's professional, technical, administrative and financial resources in the carrying out of their roles
- The FHCs are engines of local economic activity and development in the rural areas that they are based
- The FHCs enjoy the goodwill of the various stakeholders who use their facilities
- The staff of the Harbours have the respect of the users of the harbours
- The User Group meetings are seen as an excellent opportunity to discuss local issues and for attendees to be advised of proposed developments

#### **3.10.2 Weaknesses**

- Only with grant-aid are the Centres generally financially viable on a day-to-day basis
- Some of the FHCs suffer from inadequate infrastructure in terms of berthage, storage and water depth to address their current and projected needs
- Many of the Fishery Harbour Centres are remote from major population centres and are hindered by poor road infrastructure
- Some fish are landed, primarily, pelagic, at fishing ports outside of Ireland on grounds of better local price
- The rolling Capital Expenditure Programme hinders the planning and development of the sector as it does not necessarily allow for changing priorities to be addressed.
- The 'dual' structure of Administration and Engineering is unwieldy
- Equally, the relationships between tenants and the Department, particularly in relation to dealing with leases, are considered frustrating
- The amount and extent of outstanding Debtors that each harbour has generally do not reflect standard business norms
- The billing and collection of FHC invoices are not under the control of the local Harbours
- There is little, if any, commercial focus or ethos within the Centres and the Centres are reactive to opportunities
- Staff movement in the Department reduces corporate knowledge and memory, and affects the operational management of the FHCs
- Managers have little discretion over local budgets and budget setting
- Harbour charges are not reviewed sufficiently regularly to take account of cost inflation
- Ice sales are declining as vessels become more reliant on their own ice-making plant

### 3.10.3 Opportunities

- The principal opportunity lies with increased landings from foreign vessels with the proper marketing, local support and co-operation
- The transfer of landings of the Irish fishing fleet outside the jurisdiction back to Irish harbours and subsequent down-stream processing could also increase Irish landings
- There should be greater exploitation of non-quota fish
- Marine leisure through the construction of local marinas and related activities is seen as a major opportunity
- The new round of decommissioning should make fishing more economically viable for the remaining Irish fleet that continue
- A restructuring of harbour-based management to provide greater autonomy in the running and development of their Centres and in business promotion
- The contracting-out of the operation and maintenance of the Synchrolift
- Utilising the deepwater capability of many of the ports to facilitate the development and expansion of suitable commercial shipping activities
- Oil industry support activity particularly on the western seaboard

### 3.10.4 Threats

- A reduced take-up of the next round of decommissioning
- A reduction in Exchequer receipts could delay or possibly abandon the implementation of planned capital works
- Further rounds of quota reductions will impact the economic basis of the Irish fleet
- A failure to provide the appropriate infrastructure to handle increasing vessel size
- Accidents and claims arising from the failure to segregate fisheries from increasing marine leisure/tourism activities in Fishery Harbour Centres
- Fish processing is moving offshore because of high local labour and transport costs; there are also issues of stability of supply
- Need to be seen to avoid displacement
- A failure in progressing the recommendations of this Report



Údarás na  
Gaeltachta

# ROS AN MHÍL

# STRATEGIC ENTERPRISE ZONE

FEBRUARY 2023

**MASTERPLAN  
EXECUTIVE  
SUMMARY**



## Delivering on Ireland’s Climate Action Plan

The west coast of Ireland will be a major location for the development of offshore windfarms and key to delivering the Governments vision for Ireland to become energy independent, a strategic goal of the current Government. This will see the installation of at least 5 GW of offshore wind farms in the short to medium future. The capacity exists for up to 70GW in the long-term which would make Ireland a major energy exporter.

Experience from the North Sea and other areas where offshore wind is developing is that suitable port availability can be a significant limiting factor. The west coast will require every bit of port infrastructure that can be provided to exploit the opportunities that exist. Ros an Mhíl, Co. Galway is strategically located at the centre of the west coast and has capacity to become one of the key ports required to support this industry. In 2022, Údarás na Gaeltachta commissioned an independent consulting team led by Atkins to develop a Masterplan for Ros an Mhíl ‘Strategic Enterprise Zone’ that would provide a road map for the evolution of Ros an Mhíl up to 2037.

This Masterplan as summarised here shows that, if acted upon, Ros an Mhíl could provide a fast-track route to delivering a key part of these port facilities to accelerate developments on the west coast.



Figure 1: Planned Offshore Wind Projects for the West Coast of Ireland

## Future Proofing Ros an Mhíl

In February 2022 the Department for Agriculture, Food and the Marine announced €25m for the development of deep-water quay facility in Ros an Mhíl Fishery Harbour Centre. Critically, this investment recognises that the port facilities could also facilitate the development of renewable energy in the area, with the Minister for Agriculture, Food and the Marine, Charlie McConalogue, T.D. stating that the development of Ros an Mhíl is "a really good strategic vantage point to be able to service that (renewable) industry in the years ahead"<sup>1</sup>. Construction of the new deep-water facility with 200m long quay commenced in January 2023.

This Masterplan for future sustainable growth and development of Ros an Mhíl as an Economic Enterprise Zone allows for enhancement of the fishing industry whilst future proofing for staging, assembly, and servicing of the offshore wind industry.



Figure 2: Ros an Mhíl 2037 Masterplan layout

<sup>1</sup> RTE News, Tuesday 1<sup>st</sup> February 2022, Maggie Doyle

## Opportunities

The **proximity of Ros an Mhíl to the 5GW** (Figure 1: Planned Offshore Wind Projects) of west coast offshore wind projects under development, and potential for over 70GW of projects regionally, **results in long term demand** for the infrastructure and supply chain proposed in this Masterplan.

The strategic development of Ros an Mhíl as a hub for wind energy support services is actively supported by fishing community representatives locally and by the local Ros an Mhíl harbour support group. This Masterplan envisages a future strategic enterprise zone in which the fishing industry and the renewable energy sector work in parallel.

A focus on readiness for the near-term development and construction phases of offshore projects is key to ensure these high value activities are situated within the Masterplan area and effectively leveraged to attract on-going Operations and Maintenance activity throughout the lifetime of the offshore wind farms.

The first west coast offshore wind farm, Fuinneamh Sceirde Teo located at the Sceirde Rocks at the mouth of Cuan Chill Chiaráin and only 20 NM from Ros an Mhíl, is expected to submit to ORESS 1 in 2023, with construction of 450MW to commence within 2-3 years of award. The subsequent floating wind pipeline will follow with an expectation of at least one additional 1GW farm requiring extensive port infrastructure before 2030 and several others currently in the pipeline.

Renewable energy companies have publicly expressed their concerns over the current availability of suitable port facilities; a view shared by representative bodies such as Wind Energy Ireland. The assessment below of Ros an Mhíl indicates its suitability for development as a Floating OSW hub should the recommendations of this Masterplan be implemented.

Requirement	Minimum Requirement	Preferred Requirement	Response	Ros an Mhíl's Suitability
Access Channel Width	150 m	200 m	Addressable through future dredging	Yes
Access Channel Draft	9 mLAT	14 mLAT	Addressable through future dredging	Yes
Quay Water Depth	9 mLAT	14 mLAT	Planning Permission in place for - 12m CD	Yes
Quay Berth Length	300 m	600 m	400m Quay proposed for Phase 2	Yes
Quay Berth Length + Staging	600 m	900 m	Manufacturing not proposed – Not relevant	Not applicable
Quay berth Width	40 m	80 m	Berth pocket width as required in Phase 2	Yes
Quayside Bearing Capacity	15 t/m <sup>2</sup>	50 t/m <sup>2</sup>	Design decision by DAFM – site suited to high bearing capacity	Yes

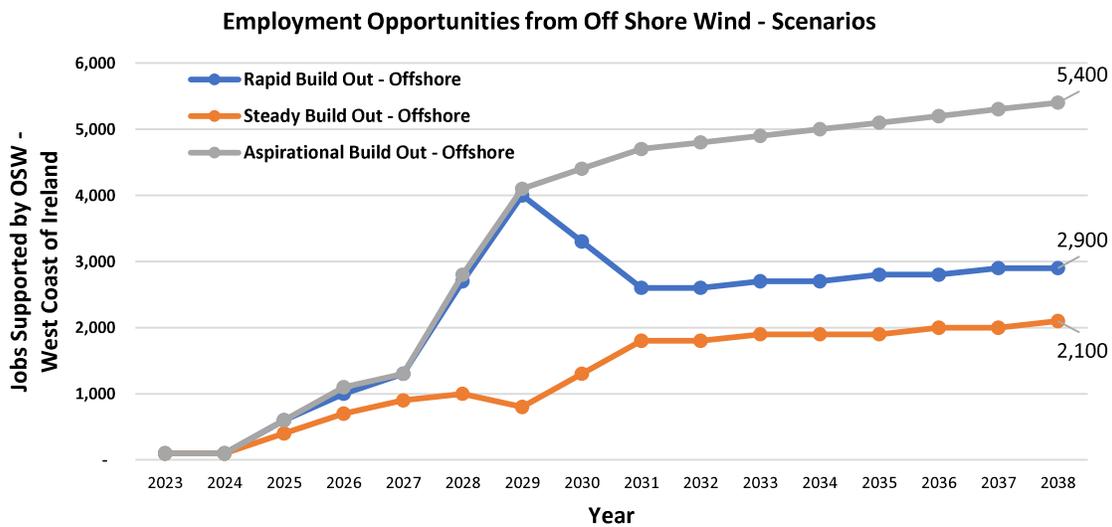
Laydown Area – Substructure Assembly	12 ha	18 ha	Suitable laydown area demonstrated in Phase 2 proposed	Yes
Laydown Area - Staging	6 ha	12 ha	Suitable laydown area demonstrated in Phase 2 proposed	Yes
Laydown Area - Manufacturing	34 ha	50 ha	Manufacturing not proposed – Not relevant	Not applicable
Laydown Bearing Capacity	7.5 t/m <sup>2</sup>	20 t/m <sup>2</sup>	Design decision by DAFM – site suited to high bearing capacity	Yes
Wet Storage Area	Yes/No	Yes/No	Significant suitable Wet Storage in Galway Bay	Yes
Wet Storage Depth	13 mLAT	23 mLAT		
Wet storage Location	No	N/A		

**Table 1: Assessment of Ros an Mhíl’s suitability**

Ros an Mhíl’s strategic advantage includes the ports’ location and **proximity to the pipeline of offshore wind farms**, and **access to temporary wet storage options for floating platforms** in Galway Bay.

The development of the necessary upgraded facilities at Ros an Mhíl to support these commercial projects requires approximately six years advance scheduling for design, planning and construction, resulting in the necessity to commence development work in the near term.

The combined construction and operational activities related to offshore wind at Ros an Mhíl would **support up to 900 jobs within the local area** and generate **approximately €70m GVA annually**.



**Figure 3: Employment Opportunities from OSW – Scenarios**

Ros an Mhíl and its hinterlands are ideally positioned to deliver a high-skilled workforce and long-term private investment to the Galway Gaeltacht region through supporting services to the offshore wind industry but can only achieve this through targeted and pro-active investment in the near term. Without action, the significant opportunity and current first-mover-advantage over ports within and outside of Ireland will be lost. The requirement for port infrastructure to be developed and in-place in advance of the construction of the west coast offshore wind pipeline requires urgency in development, allowing for the necessary design, planning and construction timelines.

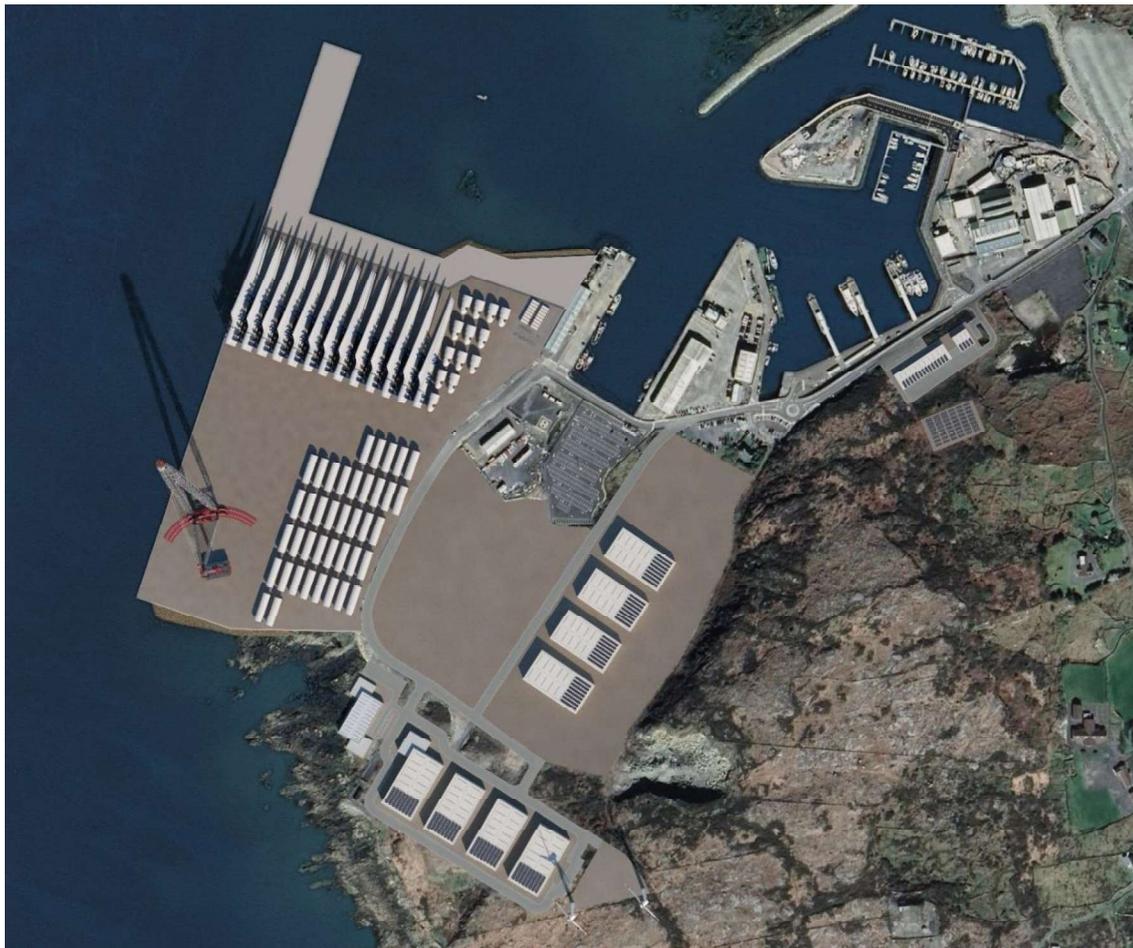


Figure 4: Masterplan View of Phase 2 at 2037

## The Phased Development

Údarás na Gaeltachta proposed a collaborative approach to the development of a Masterplan utilising both the Department of Agriculture, Food and the Marine, Údarás na Gaeltachta lands and others to form a ‘Phased Masterplan’. There is upwards of 21 hectares of land which could be developed upon.

Ros an Mhíl Port is operated by the Department of Agriculture, Food and the Marine, and is uniquely mandated to support the fishing industry, which has been a key driver and agent of economic activity locally. The new industrial opportunity that the offshore wind sector creates, provides opportunity for an extension of this mandate for the management of the port to allow the local community, including the fishing community, benefit from the significant economic opportunity.

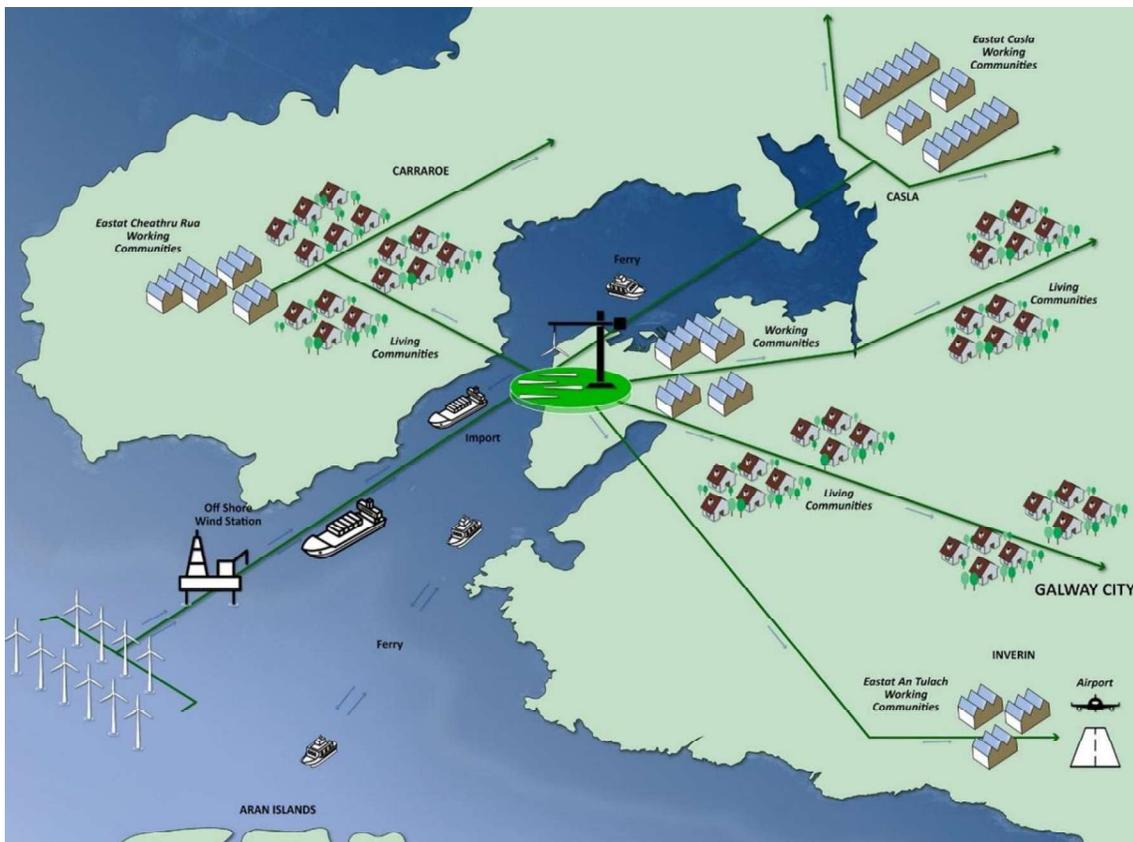


Figure 5: Benefits to the Local Gaeltacht Communities

The Ros an Mhíl Strategic Enterprise Zone Masterplan is inclusive of the established Gaeltacht community and planned population growth in the local settlement areas of Ros an Mhíl, An Cheathrú Rua and Casla.

An optimum solution for the development of Ros an Mhíl is to support parallel operations for the expanded fishing sector and offshore wind industry. This Masterplan proposes upgrades to the current development within the existing planning permission limits as Phase 1.

It also proposes a Phase 2 development, which looks at delivering extended deepwater berthing, quay facilities and ancillary services to support the offshore wind and the fishing sectors. This two phased approach will enable this Masterplan to develop its full potential as a source of sustainable employment for the region.

A **cost-effective intervention** now would deliver the additional capability required to support development and assembly work for the initial offshore wind project pipeline and begin the process of engagement with this new industrial opportunity for Ros an Mhíl. The **increase in bearing capacity** of the quay would allow handling of project cargo for the Sceirde Rocks development, which would be a major near-term impact.

### **Upgrade to existing Phase of Development (Phase 1 2023-2025):**

- Increase berth depth to -12mCD (As permitted within the present planning conditions). This would require additional dredging and re-design of quay wall to the present project.
- Increase quay bearing capacity to 35T/m<sup>2</sup> (No conflict with planning conditions. Low CAPEX impact and critical to early ORESS 1 project support).

The expected marginal capital cost of Phase 1 upgrades is €5M above the existing CAPEX budget.

### **Phase 2 Development (2025 – 2030)**

- Design, Development and Construction of upgraded facilities, including:
  - Extended deepwater quay for dedicated offshore wind project support.
  - Dedicated deepwater fishing berths and quay space.
  - Extended quay apron for offshore wind component transfer.
  - Wet Storage zone in Galway Bay for floating platforms.
- Concurrent with Phase 2 works, Údarás na Gaeltachta will plan, refurbish and repurpose as necessary their industrial estates at An Cheathrú Rua, Casla and An Tulach and other properties to align them with the evolving requirements of the OSW industry and with other off-shoot / ancillary service requirements.
- Údarás na Gaeltachta will also examine how the Aran Islands could help with the provision of infrastructure and services.

The capital cost for Phase 2 is subject to detailed design. Total capital cost is anticipated to be in the order of the annual GVA delivered to Ros an Mhíl by the activities it will then support.

## Roadmap for the Development of Offshore Wind - Timelines to 2037

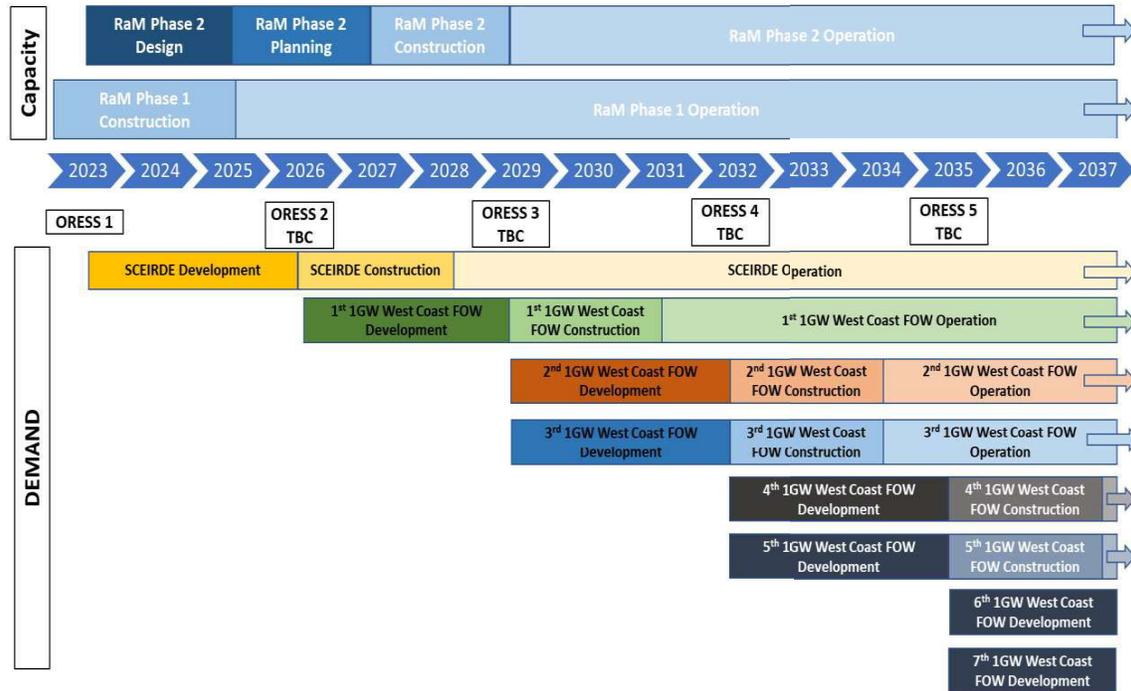


Figure 6: Roadmap for the Development of Ros an Mhíl

The summary roadmap for offshore wind project on the Irish west coast combines anticipated timings of regulatory approval for these developments to commence, with the necessary lead-in times for development of the necessary supporting infrastructure. Ensuring that port infrastructure is developed in advance of project timelines is essential to allow offshore wind benefits be realised locally. The Offshore Renewable Energy Support Scheme (ORESS) auctions are expected, once commenced, to allow projects to bid regularly for permission to commence development and the existing significant pipeline of declared projects in proximity to Ros an Mhíl supports assumptions of ongoing project development support requirements in the coming years.

## Conclusion And Recommendations - Next steps to delivering Ros an Mhíl and Ireland's Climate Action Plan

If acted upon, this Masterplan could provide a fast-track route to delivering facilities to service the Floating Offshore Wind industry on the west coast of Ireland. Atkins and their team have prepared this plan with the benefit of global leaders in offshore and port development and have identified a clear opportunity for Ros an Mhíl to play a significant role in the development of Floating Offshore Wind, not only on the basis that it supports the local economy and Gaeltacht area ( 900 jobs within the local area and €70m GVA annually) and in meeting our Climate Action targets. However without early investment in port infrastructure, Irelands ports will out on this opportunity to other UK and European ports.

- It is recommended that Údarás na Gaeltachta and the Department of Agriculture, Food and Marine and other vested stakeholders work collaboratively to ensure that the investment secured for Ros an Mhíl is expended on a sustainable development that will best serve the local Gaeltacht community into the future.
- Seek an innovative way in which to overcome the marginal funding gap for Phase 1 upgrades before Q2 2023.
- Develop Cabinet level understanding for the necessity of cross Departmental action to deliver this strategic infrastructure for the region.
- Jointly develop a collaborative model for future Port operations and dedicated industry zones.
- Commence active development work for Phase 2, inclusive of all stakeholders, before Q2 2023.
- **Act Now!** Delays in progressing development will result in Ros an Mhíl missing a one-off opportunity to deliver a high value industrial hub in the heart of the Gaeltacht. The rapid rate of offshore wind demand compared to the long lead time of Port upgrades means there is a risk of undersupply of suitable regional port capacity. If acted on now, Ros an Mhíl can bridge that gap and ensure that benefits are capitalised locally and nationally.

Further supporting detail is provided in the full Ros an Mhíl Strategic Enterprise Area Masterplan prepared by Atkins in partnership with Dublin Offshore, Biggar Economics and VHA Architects.

## Notes



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