

An Coimisiún Pleanála
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IWDG comments on proposed development of Rosslare Europort Offshore Renewable Energy (ORE) Hub

The Irish Whale and Dolphin Group (IWDG) was established in December 1990 and is an all-Ireland group dedicated to the conservation and better understanding of cetaceans (whales, dolphins and porpoises) in Irish and other waters through increasing awareness, research, education, welfare activities and collaboration (see <http://iwdg.ie>).

The IWDG welcomes the opportunity to comment on Iarnród Éireann's application to An Coimisiún Pleanála for planning permission to develop Rosslare Europort ORE Hub, recognising the vital role of port infrastructure in servicing Ireland's nascent ORE industry, and the importance of that industry in enabling Ireland to reach our climate targets.

Our comments are restricted to Chapter 13 Marine Mammals; Technical appendix 13 Marine Mammals – Report 2 Underwater Noise; and Chapter 26 Summary of Secondary Mitigation Measures and Monitoring.

The IWDG would like to commend the proponents for their comprehensive assessment of marine mammal presence over a two-year period through vantage point (VP) surveys and static acoustic monitoring (SAM). The group would also like to bring attention to the comprehensive underwater noise modelling carried for

piling, blasting and dredging activities. Notably permanent threshold shift (PTS), temporary threshold shift (TTS) and disturbance/displacement were all assessed, and broadband sound measurements taken prior to the assessment.

Modelling did not account for the extensive bunds which are predicted to prevent some of the noise propagating into the wider marine environment, so this can be said therefore to be an assessment of the worst-case scenario.

However the following section (in italics) from **Chapter 13 Integration of the Bunded Area as a Designed-in Feature** assumes that the bund will act similarly to noise abatement systems (NAS) such as bubble curtains, cofferdams etc which achieve sound reductions of 10–30dB (DAHG 2014), ~20dB (Stokes et al. 2010) or up to 24dB (JNCC 2024). There is unfortunately no evidence offered to suggest that engineered systems designed with the sole purpose of reducing sound levels from piling can be matched in their efficacy by stone bunds. (Note also that Stokes et al. 2010 and JNCC 2024 are not listed in the references.)

The influence of piling within the bund on underwater noise emitted from piling activities (see Chapter 6: Project Description of this EIAR) could not be considered in the noise modelling undertaken, as there is insufficient empirical data to establish definitive values for the noise attenuation levels provided by bunds. Additionally, the noise of piling within contained (small boat harbour) and enclosed (ORE Berths) bunded areas cannot be precisely modelled due to site-specific variables, including bund structure, water depth, and substrate composition, all of which influence noise attenuation. Published evidence demonstrates that physical barriers of this type consistently reduce underwater noise by a material margin. NPWS (2014) reports reductions in the order of 10–30 dB using fully enclosing or confined barriers, while Stokes et al. (2010) modelled reductions of ~20 dB for de-watered cofferdams, and JNCC (2024) reviews found physical abatement systems to achieve up to 24 dB. Accordingly, while the precise reduction achievable at Rosslare cannot be modelled, it can be stated with confidence that the bund will materially reduce sound input to the wider marine environment compared to unbunded piling.

Furthermore in **Chapter 6 (6.4.6.1) Piling for the ORE berths** it is stated that *piling for the ORE berths will commence once the rockfill bund construction has sufficiently advanced to enable safe access to conduct the piling works*. This does not indicate to what extent the area is enclosed by bunds prior to piling taking place, or how that might influence the noise-abating function of the bund. The IWDG recommends that these points are clarified, and that a clear sequence for bund construction and the piling campaign is presented.

Table 13.9: Predicted distances to weighted cSEL thresholds for PTS and TTS to marine mammals from piling shows predicted distances to threshold for the species groups under different fleeing speed scenarios. These show a TTS distance of 2600m for both low frequency animals (baleen whales) and very high frequency animals (porpoises) under the slowest fleeing speed of 1.5m/s. These distances are way beyond what can be effectively mitigated for using single point visual methods, i.e. a single MMO monitoring the 1000m mitigation zone dictated by the NPWS Guidance (DAHG 2014). The assumption that an animal will flee at a minimum of 1.5m/s is not explored, and no modelled distance for TTS is offered for an animal that does not flee. The IWDG recommends that if the full noise-abating effects of the stone bunds will not be available throughout the piling campaign, then multiple MMOs should be used to effectively monitor a zone equivalent to at least the modelled TTS zone, as the 1000m zone is insufficient. Alternatively bubble curtains or other similar Noise Abatement Systems (NAS) can be used to reduce the noise produced into the receiving environment.

Table 13.12: Maximum predicted distances to zero-to-peak SPL thresholds for PTS and TTS to marine mammals from rock blasting indicates that porpoises may suffer PTS injury from blasting at a distance of 1630m, even up to 2670m at the upper bound of prediction, and the TTS zone extends out to 3000m.

Protocols to mitigate this are outlined in **Table 26.1: Secondary Mitigation Measures and Monitoring Summary – Construction Phase** and include: *A 1000 m exclusion zone (as per DAHG, 2014) will be established around the blasting location. A 30-*

minute pre-blast watch will be conducted by a qualified MMO to confirm that no marine mammals are present within the MZ. If any are observed, detonation will be postponed until the zone is clear. Also: An ADD(s) will be deployed prior to detonation to encourage marine mammals, particularly harbour porpoise, to vacate the 1000 m MZ.

The 1000m monitored zone is not sufficient to prevent PTS injury to porpoises, nor are ADDs allowed for in the current NPWS Guidance (DAHG 2014). The IWDG again recommends the use of bubble curtains or similar NAS technology to reduce the PTS injury zone as much as possible during blasting operations. This is in line with the latest recommendations from the UK (JNCC, 2025) for UXO clearance.

Yours faithfully



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References

DAHG (2014). Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters, DAHG, 2014. https://www.npws.ie/sites/default/files/general/Underwater%20sound%20guidance_Jan%202014.pdf

JNCC. 2025. JNCC guidelines for minimising the risk of injury to marine mammals from unexploded ordnance (UXO) clearance in the marine environment. JNCC, Aberdeen.