Our Case Number: ACP-323980-25

An Coimisiún Pleanála

Futureproof Clare Environmental CLG
c/o Sinéad Sheehan
12 Connaught Road
Scarriff
Co. Clare
V94 RCX7

Date: 13 August 2026

Re: Proposed Water Supply Project for the Eastern and Midlands Region
in the counties of Clare, Limerick, Tipperary, Offaly, Kildare, and Dublin.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

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

Please be advised that those who have already paid €50 are not required to pay a €50 fee at this time, a refund will be issued to the debit/credit card used to make payment for this submission

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

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

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An Coimisiún Pleanála

SID Online Observation

Online Reference
SID-OBS-005792

Online Observation Details

Contact Name	Lodgement Date	Case Number / Description
Sinead Sheehan	21/07/2026 16:52:28	323980

Payment Details

Payment Method	Cardholder Name	Payment Amount
Online Payment	Sinead Sheehan	€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of
€ 50.00

Lodgement No
LDG— 089953 - 26

Reason for Refund
No fee required for second round submission

Documents Returned to Observer
☐ Yes ☑ No

Request Emailed to Senior Executive Officer for Approval
☑ Yes ☐ No

Signed
Lauren Aff
EO

Date
13/5/26

Finance Section

Payment Reference
ch_3Tvfy4B1CW0EN5FC06xnnz42

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount
€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Futureproof Clare Environmental CLG

c/o Sinead Sheehan

12 Connaught Road

Scariff

Co. Clare

V94 RCX7

Date: 21st July 2026

ABP Case number: ACP-323980-25

Re: Proposed Water Supply Project for the Eastern and Midlands Region in the counties of Clare Limerick, Tipperary, Offaly, Kildare and Dublin

To whom it may concern,

Futureproof Clare would like to make a submission on the Response to Submissions in relation to ACP Case number ACP-323980 -25 regarding the Proposed Water Supply Project for the Eastern and Midlands Region in the counties of Clare, Limerick, Tipperary, Offaly, Kildare and Dublin (herein referred to in this document as WSP) available on the Commission's website and in response to a letter inviting submissions to Uisce Eireann's responses received from An Coimisiún Pleanála (ACP) in a letter dated 26th June 2026.

We have separated this submission into sections based on issues that we wish to raise with the commission. We have not used Chat GPT in our submission.

1. **The use of Chat GPT by Uisce Eireann (UE)**

The process used by UE in responding to submissions is something that Futureproof Clare (FPC) strongly objects to. The use of Chat GPT to thematically analyse the submissions received on this project suggests that nobody in UE has read each and every submission. The use of AI in such an important SID affecting numerous people, places and natural resources is an unproven shortcut to creating a relevant and thorough response to the submissions, which is part of UE's statutory obligations. There is a lack of transparency about how Chat GPT processes, uses and reproduces information, therefore it does not represent an appropriate tool to use as an initial way to find themes in the 114 submissions it received. Hence there is a lack of evidence the Applicant has sought to ensure that the substantive matters raised in each submission it received are appropriately addressed in their Responses to Submissions

2. Continue to lack consideration of reasonable alternatives
Futureproof Clare, in its submission to An Bord Pleanála in relation to the WSP highlighted that there has been a lack of consideration of reasonable alternatives such as state-led large scale rainwater harvesting. The response from UE appears to have considered only domestic rain water harvesting and therefore lacks consideration of all reasonable alternatives to the proposed WSP.

3. Leakage reduction of drinking water Section 1.4.2
We refer to section 1.4.2. Point 21, along with 1.4.3 where the report repeatedly uses the term "drinking water" to describe the water that would be sources from the Shannon. . This sentence demonstrates that UE are claiming the water coming from the Shannon will only be used as drinking water. There is a lack of acknowledgement along with inaccurate calculations in the response about how much water would be used by data centres. Water used by machines may be drinkable but it is not drinking water - this is misleading.and renders the entire report misleading. If the water abstracted from the Shannon will be used by data centres, then it changes the purpose of the abstraction and this should be clearly stated by the responses, especially given this was an issue raised in several of the submissions on the project.

4. Temperatures in 2026 are unprecedented, and climate change is unpredictable.

The Water Framework Directive requires that a proposed activity must not cause deterioration in the status of any affected water body or prevent the achievement of environmental objectives. The response claims the following: "*The WSIAR appropriately assesses the Proposed Project against the current statutory flow regime and demonstrates that the abstraction will not cause deterioration or impede the achievement of WFD objectives."* This claim relies on modelling based on data from 2018 and not at current water quality quality levels and is therefore a flawed claim. Climate change has created unprecedented temperatures in Ireland already in 2026 and due to tipping point scenarios in relation to the Gulf Stream and AMOC, climatic and weather conditions are unpredictable. Calculations of the impacts of the proposed WSP ought to be based on worst case scenario models, and modelling should be presented for more recent years, along with 2018. Now that Ireland has had a demonstrable increase in temperature due to climate change in 2026, new models need to be run to assess the impact of the WSP on the future of Lough Derg, the Parteen Basin, Lough Derg SAC, the Lower Shannon SPA and surrounding special areas of protection, as well as on water quality and water flow.

5. Consultation process
The Aarhus convention states clearly that proper public consultation is needed in relation to development. 114 submissions were made including from county councils in Clare, Tipperary, Limerick and Offaly whose councillors are elected democratically to represent the general interests of the local area. UE does not consider the local authorities' authority, so to speak. If the local authorities are all opposed to the WSP, then it clearly should not get the go ahead by ACP. In 4.2.1.1 point 300, the Applicant claims to have used an adequate consultation process. However, as demonstrated by appendices 1 and 2 in this document, the documentation of the the consultation by UE is vastly different than the documentation by the community raising serious questions about the validity of the consultation report that have not been adequately addressed in the Applicant's response to concerns raised broadly

about the inadequacy of the consultation process. Point 309 of the Applicant's response states that consultations took place over an 8 week period in Tipperary but failed to take place in Clare, Offaly or Limerick, before the closure of the initial deadline for submission to ACP in relation to the WSP, all places which are named in the application. There was no physical planning notice up in the vicinity of Mountshannon, Tuamgraney, Scariff, Whitegate all located within the Zone of Influence.

6. The need for the project

Page 60 of the Applicant's response in point 359 states: "*Population and economic growth have driven a 15% increase in demand for water* ". The point attempts to respond to submissions which question the need for the SWSP due to the alternative which involves fixing leaks in the water supply. UE response is inadequate because it does not justify why it can't fix the leaks, nor does it justify why it can't supply water from elsewhere, for example build a new project in the east of the country where there is a higher demand due to population growth AND data centre usage (see Meta facebook report on data centre water usage: https://sustainability.atmeta.com/wp-content/uploads/2024/08/Meta-2024-Sustainability-Report.pdf where one data centre used 859 megalitres of water in 2024. Given there are approximately 80 data centres in the area the PWSP would supply, Uisce Eireann's response should contain a reference to the need for data centres to supply their own water, instead of using tax payer money to extract water from the Shannon..

Point 373 states in relation to potential reservoirs in the east: *Today, very few suitable sites remain, and those that do are often environmentally sensitive or heavily constrained* In theis sentence, UE have proffered the very reason that the Shannon is not a suitable site for water abstraction because it too is heavily constrained and environmentally sensitive. Given its distance from Dublin, UE have no provided an adequate reason for its preference for the Shannon over other water sources closer to the greater Dublin area.

7. Groundwater supply

Lack of adequate response to why the project did not consider groundwater as a supply
In point 379, the Applicant's response refers to its lack of consideration of groundwater as an alternative water supply for the proposed project. The reason stated for lack of consideration of groundwater is "*largescale ground water storage is not available in all areas and in general groundwater is more applicable to smaller supplies in Ireland* ". Here UE is admitting that it did not consider supplying smaller areas with smaller supplies,and instead only considered that the Dublin area could be supplied with very large environmentally unsustainable projects such as the proposed pipeline. It does not address the issue that several smaller groundwater projects could become the supply if they were developed and the greater dublin area supply project was broken down into several smaller scale areas for supply.

8. Rainwater Harvesting - consideration of feasible alternatives

Section 5.2.5.1 attempts to respond to submissions that raised the possibility of rainwater harvesting, The response is inadequate because it ONLY addresses domestic rainwater harvesting. Surely 6 billion euro could be spent on one or more large state-owned facility that could harvest large amounts of rainwater. Therefore the response has not adequately considered submissions that suggest harvesting rainwater is a much cheaper and more

environmentally sustainable way to supply water to the greater Dublin area. It was clear from Futureproof Clare's submission that the suggestion was not for domestic rainwater given we suggested Poulaphouca or building another reservoir. It is possible that Chat GPT misinterpreted our submission, as consideration to building state owned reservoirs to harvest rainwater has not been given or responded to by UE.

9. Vulnerability of relying on the proposed project

Section 6.3.10.1 does not expressly address the issue raised in submissions of the problem of relying on the Shannon in relation to a lack of vulnerability assessment, probabilistic analysis, emergency response protocols, estimated repair times, and redundancy provisions, as per James Crowley's submission. Merely stating UE does not agree with the assessment is not an adequate response to the issues raised.

10. Noise of construction

A number of submissions raised the issue of construction noise and these are not adequately addressed by the Applicant's response in Section 8. The EIAR was said to address the impact of noise during the construction phase in relation to the potential disturbance to resident humans, but it fails to address ecological impacts which can be significant for wildlife in protected areas including the Lower Shannon SAC and Lough Derg SPA. The Applicant response does not refer to any risk assessments conducted and we argue that this is problematic because ongoing noise, such as referred to in the Applicant response in point 707.

11. Impacts of project on biodiversity, habitats and species

Point 924 of the Applicant response refers to a modelling report based on data from 1972-2023. It claims that the modelling suggests no significant impacts would arise to Lough Derg or Parteen Basin based on this 52 years of data However, the modelling is bound to be flawed if it bases its risk assessment on data from the 1970's, 1980;s, 1990's and 2000's because there was significantly less pollution in the river Shannon at that time compared to now. Those of us who swim regularly in Lough Derg see the toxic algae increase year on year, due to pollution and climate change. We argue that the impacts to biodiversity, habitats and species were not adequately addressed in the EIAR and that this issue was not adequately recognised in UE's response to the submissions on this topic.

In addition points 943 and 944 refer to modelling conducted based on data from 2018 which found that there would be a minimal or neutral effect on Lough Derg and the Parteen Basin. The year 2018 was justified in the Applicant response based on it being a year of drought. However, if conducting a risk assessment for algal bloom and the impacts of the proposed project on algal bloom, then the year chosen ought to have included the year when the algal bloom and/or pollution was at its worst, considering that both algal bloom and pollution are worsening in the area. The Applicant response suggests that it took into account climate change but only certain climate change scenarios were risk assessed and not all realistic predictions of temperature increase as a result of climate change were risk assessed, nor referred to in the applicant response.

12. Otters, bats and other protected species and habitats

Section 10.4.9.1 refers to assessments for impacts of noise and works related to the project on otters and bats, and their habitats. The section appears to indicate that if works take

place outside 20m of an existing habitat, that the habitat nor its inhabitants would be adversely affected. However, 20m is a very short distance and surely this is not adequately assessed or responded to.

13. Modelling the impacts of climate change

In Section 11.2.4.1 the applicant response claims that climate change has been taken into account and yet again models the impact of the proposed project based on 2018. However, there has already been a recorded increase in temperature in the last seven or eight years, with the hottest year on record broken two years in a row and expected to increase again. Not only do we have hotter days, but we have heat for longer. A proper risk assessment has not been conducted based on the current impacts of climate change, if the modelling is based on 2018, particularly given the record temperatures of 2025 and 2026.

14. Impacts on flow of Old River Shannon

With regards to the proposed project's impact on the flow of the old river Shannon, and therefore on the ecological status, the response provided in Section 11.2.6.1 is inadequate. Point 1461 regards the issues raised as "*being conflated with an existing issue, that is not for the Proposed Project to resolve* ". However, the proposed project must take into account other existing issues faced by the River Shannon if it is to properly assess the impact of abstracting water from it, and this includes the cumulative impacts of Ardnacrusha along with other industrial and recreational activities taking place close to the proposed pipeline.Additionally in point 1519 of the response document, it is stated: "*The Applicant will not control water levels or the management of water levels and therefore is not committing to providing water level monitoring or monitoring the flow to the Old River Shannon".* So the water is set to be abstracted by UE, and is admittedly expected to affect the flow, but UE do not take responsibility for monitoring the flow, because they say that ESB already does so. However, there is no response about the communication between ESB and UE regarding this monitoring and it is unacceptable that UE would not monitor the flow.

15. Habitats Directive

Point 2590 refers to the Habitats Directive and states: "*Because the proposal does not trigger the legal threshold of an adverse effect on site integrity under Article 6(3), the derogation provisions under Article 6(4) are not required".* However, we argue that the legal threshold was not triggered because of a lack of appropriate assessment of impact for protected species in the zone of influence. For example, there was no mention of assessment of impact on the White tailed Eagles that live and breed on Lough Derg. In other areas of the report the negative impact on habitats of bats, otters and fish migration is mentioned, so why is it claimed in the NIS that the legal threshold is not triggered?

The impact of the proposal on several of the species that breed or feed in or around Lough Derg has not been assessed or responded to by the Applicant, for example terns, whooper swans, egrets and grebe.

Point 2674f states "*During reduced periods of hydropower generation, they[smolts] would therefore be encouraged to migrate downstream over Parteen Weir, instead of through the turbines at Ardnacrusha".* However, the response does not state how the smolts would be

"encouraged" and what kind of monitoring and mitigating factors are involved in this complicated suggestion.

Point 2686 states: "*The assessment concludes that the Proposed Project will not introduce changes to hydromorphological or flow conditions that would affect the structure or function of qualifying interest habitats*".. However, previously in the Applicant response document, UE state that flow will be impacted by the proposed pipeline operations. In addition construction works will introduce adverse changes to the structure and function of qualifying habitats.

Point 2722 states "*It is critical to emphasise that the hydrological regime of Lough Derg is not natural but highly regulated, primarily for hydropower generation by ESB, with secondary functions relating to navigation and flood attenuation. The lake has been managed within a defined 460mm Normal Operating Band since the late 1970s. Over this extended period, shoreline and littoral habitats within the SAC have demonstrably adapted to, and stabilised under, this controlled and inherently variable regime. As such, these habitats are resilient to fluctuations within the established Normal Operating Band on Lough Derg".* However, the habitats are not resilient, species have been in decline since the 1970's and the proposed pipeline is set to add another pressure on an ecosystem that does not have the capacity to withstand more impacts on its declining status.

16. GHG Emissions

Point 3104 states."The Proposed Project is required to calculate its GHG emissions and assess the likely significant effects of these emissions on climate, and this has been done and reported in EIAR Chapter 13 - Climate". However, the calculations were not conducted with full reference to operations and in accordance with the climate act. For example, the EIAR states that vehicles transporting the pipeline will run on palm oil, which is has a GHG and ecologically intensive life cycle assessment resulting in adverse climate change impacts not mentioned in the applicants response.

17. Operations of Ardnacrusha

The UE response frequently refers to its reliance on ESB for monitoring and for operations of the proposed water supply pipeline. However, the risk that the proposed project would adversely affect Ardnacrusha and result in its closure has not properly been assessed or addressed in the response document.. Ardnacrusha supplies power which, if closed would be likely to be replaced by energy that, unlike hydropower, is not renewable, resulting in higher emissions. This impact has not been properly addressed by the Applican'tresponse to issues raised about cumulative impacts of the proposed pipeline.

18. Lack of response in relation to issues raised about data centres

As noted in Appendix 1, the issue of the WSP being used to supply large water users such as data centres is of major concern to local communities impacted by the project, and was raised in Futureproof Clare's submission. However, the UE response appears to contain unclear information about how much water would be supplied to data centres in the greater Dublin area.

According to a recent report by McGrath & Alamamos (2024) (https://thewaterforum.ie/app/uploads/2024/10/McGrath-2024-Data-Centre-Water-Use-in-Ireland-.pdf) the figure about water usage of data centres provided by UE in its documented

notes on the community meeting in Scariff as part of the public consultation on the WSP are incorrect. UE claim that data centres would use less than 1% of the water supplied by the pipeline, but this conflicts with Meta's Sustainability report that indicates one data centres used 659 megaliters of water in 2023, and839 megaliters in 2022. Howe much water are the all data centres in the greater Dublin area using during a drought period like 2026? Clearly the water modelling conducted in 2018 referenced earlier in the report did not take into account current data centre demand on water, and therefore will have come to erroneous conclusions about the assessment of the impacts of the WSP on habitats, flora, fauna, water flow and water quality.

It is misleading to bill the project's necessity to supply drinking water to the greater Dublin area, if the pressures on drinking water have come about because of increased water demand from data cetres. This is a problem that UE and the government should resolve otherwise, not by taking water from the Shannon, which is already under ecological pressure and by the reports' own admission, would be placed under even more pressure by the WSP.

In addition, the public have asked UE for the figures on data centre water usage in the greater Dublin area which has not been provided with adequate information and referencing, and this is simply unacceptable.

19. Rights of the Shannon River

We submit that The Shannon itself has rights and these have not adequately been represented or addressed in UE's application nor in its response to submissions. We argue that UE does not have the right to abstract water from the Shannon at this level and has given inadequate consultation to the communities that are impacted by the SWSP and to the local authorities in the area. Please see appendix x for a copy of notes from an UE meeting that took place in Scarif on 10th June to demonstrate the inadequacy and inaccuracy of the process they have used.

Conclusion

We hope that ACP take into account the issues raised in this and previous submissions in relation to the inadequacy of the EiAR, the NIS and the response from UE to the general public submissions, ENGO submissions, and submissions from prescribed bodies.

Regards

Sinéad Sheehan

Email: futureproofclare@gmail.com

Appendix 1 Community notes on meeting held by Uisce Eireann in Scariff on 10th June

Shannon Water ExtrAction Resistence (SWEAR)

Notes on meeting hosted by Uisce Eireann 10th June 2026 East Clare Community Co-op Ralahine Room 12:30-2:30

Present: Sophie Ryan (Tetratech –taking notes for Uisce Eireann), Don Murnane (Community Liason Officer, Uisce Eireann) , John Collins (Senior Programme Manager, Uisce Eireann (who arrived approx. 1pm).

Members of the community (16): REDACTED

Minutes of public consultation:

Locals raised a number of concerns documented below, with responses provided by members of Uisce Eireann. The tone of the meeting was combatative and the community was thoroughly dissatisfied with the responses to the questions. I tried to capture the main jist of the communities concerns that were raised along with the responses we were given.

At the meeting everyone from the community agreed to stay in touch and plan to organise another meeting soon to discuss options that might be available to us to protect Lough Derg, the River Shannon and surrounding areas. I numbered the concerns below - please feel free to contact me on 085 8267751 or futureproofclare@gmail.com if you want to be added to an email list or whatsapp community.

1. Cost of project is around 6 billion taxpayer money. Would this be better spent on fixing leaks?

Response: Fixing leaks would not be feasible because there would be too much disruption to people and businesses in Dublin.

2. The extraction of an average of 300 million litres of water per day from Parteen Basin raises significant ecological concerns for the Shannon and for Lough Derg in particular.

Response: There are around 200,000 pages in planning documentation that demonstrate water levels can be maintained and any impacts on the ecology can be accounted for or mitigated.

3. When Ardnacrusha is taking water from the Shannon will this affect the amount of water taken via the pipleline? Will there be less water taken when Ardnacrusha is operating and using water so that the water levels do not drop too low?

Response: the 300 million litre per day is a maximum. This is approximately 2% of long term average flow of the Shannon. Could not provide information on the exact

expected water level drop, and how this might change from season to season. Could not provide information on what would happen if the water dropped below a certain level.

4. Would the pipeline be turned off if the water were to drop below a certain level.

Response: Unclear response. Kept repeating that the water would not drop below the level. Interpreted as a no, the pipeline would not be turned off if the water level dropped below the minimum (the exact minimum level could not be named).

5. Concerns about the quality of the consultation and the lack of expertise on the panel. Where are Waterways Ireland to tell us that this is an ok project? Where are the councillors. The community is asking genuine questions that the Uisce Eireann employees claim they do not know the answer to.

Response: This is because the Environmental Impact Assessment Report is too long, around 200,000 pages and 8 chapters, and it is not reasonable to expect them to know everything in it.

6. What is the current water usage in Dublin?

Response: 600 million litres per day

7. How much of the current water usage in the catchment area is by data centres.

Response: Less than 1%

8. Less than 1% means that approximately 50-70 data centres in Dublin together use 6 million litres of water per day. That cannot be correct. Data centres use around one million litres of water each per day. How much water exactly do the data centres use?

Response: We don't have the figures but it is less than 1%.

9. If you don't have the figures then how do you know it is less than 1%?

No response.

10. The community is concerned that our local area is going to be severely impacted. We came to live here because we have access to a water body. We swim there, our children swim there, the lake is a place of recreation for the community. We don't agree with the plan to abstract water from Parteen because it isn't for households, it's for data centres.

Response: It's a lovely area around here, you are very lucky. What is your reference for water usage of data centres? (Community member's reply: Patrick Bresnihan). We can send you a paper by somebody from…could be from UL, not sure who. We don't remember the exact figures.

11. Concern about the use of HVO (palm oil) as a way to reduce emissions. Trucks used to drive the 170km of 1.6 metre pipeline from Dublin Port The only company referenced in the application about this is CERTA, who sell HVO. This is a form of greenwashing.

Response: No it isn't. (later on John C. answers) We don't know where the HVO will come from, it may not be CERTA, depends on where they get their HVO.
Community: But why did you only reference CERTA, surely they have a vested interest in saying the use of HVO will reduce greenhouse gas emissions as they make profit from selling HVO.
No response.

12. Concern about the length it will take to complete the project and whether the assessments that have been done in projecting water needs will be accurate for the future, given population growth.

Response: Assessments contained in the project documents online take into consideration projected population growth. The assessments looked at 1200 possible solutions to the water shortages and the pipleline is the best one.

13. What about rainwater harvesting? Surely that would be much better, it's a free resource and we should be making the most of it.

Response: Agree that there should be more rainwater harvesting. Every household should harvest rainwater. Uisce Eireann will lobby for more households to harvest rainwater, and for every new build to harvest rainwater. But this is not the remit of Uisce Eireann so we can't control what happens in every household.
Community: but why not have state-owned reservoirs, not putting the onus on the households. Other countries have reservoirs that they use to supply villages and towns and they have far less rain than Ireland. You could put a number of resevoirs around the east of the country. And data centres should have to supply their own reservoirs.
Response: I agree with you that data centres are a problem. How they supply their water is not our remit.

14. Have you run modelling based on the water usage of data centres alone?
Response: No
Community: The water should be for people not for machines. Why should machines be entitled to get the good water from our rivers?
Response: We do not have oversight on water use for data centres.

15. What about the impact of the pipeline on the operations of Ardnacrusha? What about the people of Limerick and surrounds who rely on Ardnacrusha for their power?

Response: The water for Limerick is currently supplied by Parteen and they do not believe the pipeline will cause any problems. Ardnacrusha only supplies around 2% of energy anyway.

16. Who will own the land where the 170km of pipeline will be laid?
Response: In some places it will be laid on land not owned by Uisce Eireann. In other places land will be bought under Compulsory Purchase Orders. They are liaising with farmers and landowners.

17. Concerns raised that the lake is low currently. Boat has been beached for ages.
Response: Surveys have been conducted for the last 10 years. It is a normal seasonal arrangement for the lake's water level to rise and fall within a certain range. The water level to be extracted will be a pancake layer.
Community: How much water level will be removed per day.
Response: 150mil per day of 7.5 metre (or litres??) water level.
Community: For how many days?
Response: The level will be refilled from the waterways upstream.
Community: How many days will the pancake layer be removed?
We will be able to abstract water without hitting lower levels. Lough Derg will not be significantly affected.
Community: What do you mean by significantly?
Response: Our modelling is based on 50 years of data from ESB.

18. Is some of the data you are using provided by corporations? In the US corporations are people. How reliable is your data? Concerned about the impacts on small businesses.

Response: Data and statistics are property of Uisce Eireann. 22 chapters in the EIAR created by external consultancy, including surveys. Internal data from ESB.

19. We are concerned about the lack of safeguards in place if the water level were to go down in Lough Derg and there was severe ecological impact.

Response: There are positive impacts to the project. For example areas in Tipperary have been on boil water notices but the new treatment plant will provide a cleaner water supply to areas such as Newport and Cloughjordan. The project will supply water to the greater Dublin area from Wicklow and Carlow to Leitrim and Louth.

20. But what about the data centres in that area. Will the water go to the data centres?

Response: I'm concerned about data centres but I'm more concerned about energy than water.

Community: Is the water for the data centres?

Response: The water is not for data centres, but data centres can use the water.

Community: Why can't it be mandatory for data centres to harvest rainwater?

No response.

21. There are consistent references to a 200,000 page application, but you do not know what is in it so what good is that? You could have brought it along so we could properly discuss our concerns.

Response: It would be way too big!

Community: But you could bring it on a phone! You could do a document search if we asked a question if you had it on a laptop. We came to the consultation with the expectation that our questions would be answered.

Response: We will take that on board for the next time.

22. The approach of the consultation has been very passive-aggressive and problematic.

Response: Apology

23. What if we don't accept the pipleline?

Response: This is a democracy!

24. Issues raised about the biodiversity report in the EIAR and the water framework directive. The impact of the pipeline is considered "moderate". Concern that information about mitigation measures are not provided in the EIAR. Concern that

failure to comply with water framework directive leads to fines from the EU – that the taxpayer pays in the end.

Response: agree with concern about fines. Testing revealed some pollutants in the water such as mercury, not sure where it comes from.

Community: What about the recourse? What happens if the water quality drops?

Response: John C grew up near a reservoir and cares about the impacts to biodiversity.

The EPA have oversight for monitoring water quality and biodiversity. Data is available on this for a number of years. If an coimisiun pleanala approve the application the project will need to get a water abstraction licence from the EPA.

Community: How does that work?

Response: We don't know. The regulations around this have not been fully completed yet. The relevant law is called Empowerment and Water Abstraction Bill 2023. The kind of licence needed to extract water from a lake does not currently exist.

25. The decision to build the pipeline was based on data up to 2016. Things have changed in the last ten years including an increase in data centres.

Response: There are several techniques for cooling data centres. Water cooling is one way but not sure of other techniques. There are models predicting future scenarios, for example in 2050 the pump in Cloughjordan is expected to work full time.

Community: Is this based on a net zero economy

Reponse: Yes.

26. Concern for farmers who refuse to sell their land. What will be done about that if they refuse? How will the farmers be treated? We saw the Rossport 5 being beaten and jailed.

Response: It won't come to that.

Appendix 2 Uisce Eireann notes on Scariff meeting 10th June

Water usage by data centres Uisce Éireann carried out a review in 2026 of data centres water use. Data Centre consumption as a percentage of overall water supplied is low. Nationally Uisce Éireann produces over 1.7 billion litres of drinking water a day with data centres using on average 4,789 m3 a day equating to less than 1% (0.28) of all water produced. Given most data centres are in the Greater Dublin Area (GDA) water supply zone

we also analysed demand here, water production in the GDA averages 640 million litres a day, with water use by data centres still below 1% equating to just 0.8% of water produced in the GDA. Data Centres in Ireland are designed to utilise a hybrid of air and liquid cooling. This approach results in minimal to no reliance on public drinking water. For those Data Centres that are cooled by water, that water may be sourced from boreholes or from the public water supply (or a mix of both). Data Centres also recycle the water sourced from the public mains and send it back through the data halls several times, as a result, not continually drawing upon the public mains and utilising water more efficiently for cooling purposes. We also understand that future data centres will leverage rainwater harvesting for cooling purposes, with only a limited contingency window to draw from the public supplies. It remains Government policy to support the development of sustainable Data Centres by encouraging a conservation and use-less approach where possible. Uisce Éireann when engaging with Data Centre applicants through our Connection Enquiry process continue to identify and insist as part of any connection agreements that Data Centres avail of water efficient technology which minimises their requirement for water in their cooling processes.

Rainwater Harvesting Sustainability features such as rainwater harvesting systems and green roofs have been incorporated into Water Supply Project infrastructure designs where feasible. These measures help reduce stormwater runoff and contribute to treated water processes. While greywater and rainwater harvesting are private-side solutions, and not currently within the remit of the organisation, Uisce Éireann supports their adoption and is progressing pilot studies to assess their viability and benefits. However, due to Ireland's seasonal rainfall patterns, significant storage capacity would be required to make these solutions effective during dry periods, which may not be feasible for typical domestic properties. It would also not provide enough water in the timeframe within which it is required. Nature based solutions and sustainable drainage systems have been incorporated into the design of the Proposed Project and will be used to manage surface water runoff at the Infrastructure Sites. This includes, for example: • Use of rainwater harvesting at the Raw Water Intake and Pumping Station and Water Treatment Plant. This will reduce stormwater runoff that would otherwise have to be managed, as rainwater will be fed into the water treatment process as opposed to the drainage system. Baseline

Use of green roofs at the Water Treatment Plant, Break Pressure Tank, and Termination Point Reservoir. The green roofs will reduce the speed of surface water runoff, as well as contributing to biodiversity outcomes. • Use of drainage ditches, attenuation ponds, and infiltration basins, as appropriate, to control the rate of surface water discharge and mitigate water quality impacts. Abstraction Licence and Licencing Conditions An abstraction licence will be required by the project as set out in the EIAR submitted as part of the planning application. The application in respect of the abstraction licence will be made to the EPA who are the responsible body for determining abstraction licence applications, including the volume of any abstraction and operating conditions. As part of any statutory licencing consent there is ongoing regulatory control, expressly having regard to environmental protection and Water Framework Directive objectives. The abstraction licencing regime provides an operational mechanism through which any required environmental measures are enforced, including controls on volumes, flow thresholds, seasonal operation, and compliance monitoring. The maximum abstraction would be controlled by this abstraction

licence and additionally by the Planning Permission, (which is based on the EIAR which assesses a maximum abstraction of 300Mld), if granted. The abstraction licence application for the Water Supply Project is dependent on a licence application being made by the ESB for it's existing impoundment. It is Uisce Éireann's intention to submit the application for our Abstraction Licence as soon as the ESB application is made. This will allow for appropriate liaison between the Environmental Protection Agency and An Coimisiún Pleanála regarding the interface between the determination of the SID Planning Application and the abstraction licence application. The abstraction licence will need to align with the SID Planning Application regarding "the rate of abstraction, hydrological impacts, ecological impacts, and groundwater protection" and Uisce Éireann fully intends to submit an abstraction licence on this basis. The abstraction license application will be an application for the Proposed Project abstraction from the associated ESB impoundment, in line with the requirements of the Water Environment (Abstractions and Associated Impoundments) Act 2022. Management of Seasonal Variability in Water Demand The aim of Uisce Éireann is that the Proposed Project makes no change to the current water level management regime controlled by ESB. Specifically, ESB manage water levels within an upper and lower water level (which define the 'Normal Operating Band'). For the Parteen Basin, the top of the Normal Operating Band is 30.86mAOD (33.56mAOD Poolbeg) and the bottom is 30.00mAOD (32.70mAOD Poolbeg). The Proposed Project will not change this, and it will continue to be the case with the implementation of the Proposed Project. Uisce Éireann will not control where the water level is on the Parteen Basin. This will be done by ESB, and the water level will be maintained as it is today within its Normal Operating Band.

The abstraction point at Parteen Basin is a hydro-regulated system with a narrow ESB-controlled operating band. Water levels in Parteen Basin and Lough Derg are actively managed for hydropower generation, and the Proposed Project will be just one more consideration that ESB considers when managing water levels on Parteen Basin and Lough Derg. ESB normally manages the Normal Operating Band to be near full in late spring, before the onset of summer conditions, to ensure enough water supply for the statutory compensation flow during dry periods, and to be at the lower end in autumn, in anticipation of incoming wet weather flows. Even in a drought year such as 2018, the lowest recorded levels were in April and December, and not at all in the summer months. These lowermost levels, recorded naturally, pre abstraction, were substantially the same as the model predicted levels post abstraction in August 2018 (EIAR Appendix A9.1, of Chapter 9: Water). The impacts to Lough Derg (and Parteen Basin) lake levels, due to the modelled inclusion of the Proposed Project abstraction (as a constant flow of either 154Mld or 300Mld) are barely distinguishable from the baseline case when viewed on level/flow duration curves (a standard hydrological method for comparing long-term data series). The level regimes of Lough Derg (and Parteen Basin) are only simulated to be affected by the Proposed Project abstraction during extreme drought periods and in the days immediately after the drought (up to a week) when inflow is needed to replenish any deficit in storage caused by the Proposed Project abstraction. Climate change simulations for the reasonable worst-case scenario indicate that simulated lake levels would still remain within the Normal Operating Band with the Proposed Project abstraction included. From the 52-year period model simulation period (1972-2023), the simulated Lake levels are only found to be notably affected by the inclusion of the Proposed Project during the 1995 and 2018 drought events, with all other years showing no perceptible impacts. Therefore, for approximately 99% of the 52-year model simulation period, there are no perceptible impacts to simulated Lake levels

as a result of the Proposed Project abstraction. Even during the worst modelled drought event (2018) from the 52-year model simulation period, the size and rate of simulated Lake level change fits within the range of ESB normal observed Lake level fluctuations seen within the historical recorded levels and are still within the Normal Operating Band on Lough Derg and the upper and lower water level that ESB applies to Parteen Basin. The abstraction modelling is addressed in more detail in Chapter 11 – Water (Hydrological Modelling and Water Levels) of this report. Enforcement An Coimisiún Pleanála's role in the SID process is primarily a decision-making role which is set out in Section 37 of the Planning and Development (Strategic Infrastructure) Act 2006. Once a decision is made on a SID case, the Commission Order is passed to the Local Authority for implementation and compliance. In the case of WSP, if granted, this will be passed to the respective Local Authorities who will be responsible for implementation and compliance for the elements of the project within their jurisdiction. It is the local authority's function to carry out enforcement should a development not be carried out as permitted/conditioned. This is provided for under Part VIII of the Planning and Development Act 2000 (as amended). If a person is of the view that a development is not in compliance with its

planning permission, they may make a submission in writing to the local authority under Section 152 of the Planning and Development Act. It is a matter for the planning authority to investigate the issue raised and to take appropriate enforcement action. SID: Making sure the Commission's decision is followed: Enforcement | An Coimisiún Pleanála -