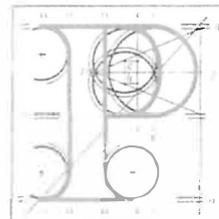


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

St. Flannans Fishing Club
c/o John Burns
Killaloe
Co. Clare

Date: 03 March 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

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

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,



Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA04

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John Burns
St. Flannans Fishing Club
Killaloe
Clare

To whom it concerns,

On behalf of Saint Flannans Fishing Club I wish to make a strong objection to the proposed construction of a pipeline from lower Lough Derg to Dublin. Although a 50 page document could be produced in objection to the project I'd like to shortlist just a couple of the key drawbacks of this application and also highlight recommendations for the project in the event it is to be passed.

SFFC objects to the Water Supply project on the basis that it is unlawful under EU environmental law, factually unsound, and procedurally defective.

The Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) repeatedly frame the proposed abstraction as representing approximately 2% of average annual flow at Parteen Basin. This is factually incorrect. During Q95 and drought-year conditions, the proposed abstraction would remove between approximately 30% and nearly 50% of available flow in the Lower Shannon under realistic operational scenarios.

The Project documentation therefore misrepresents the true scale of abstraction impacts by presenting an average-flow percentage that conceals severe low-flow effects.

This constitutes a material flaw in the environmental assessment.

The ecological effects of this project on Lough Derg are extremely concerning to members of SFFC. Again there has been significant misrepresentation in the project as does not effectively evaluate long term flow metrics. Several key parameters such as dissolved oxygen, habitat evaluation and fish migration will all be negatively impacted as a consequence of this project especially during periods of drought and low water. The Environmental Protection Agency (EPA) have classified Lough Derg and associated water bodies as being less than good. This water abstraction will further decline the ecological status.

Fish migration is a significant issue on Lough Derg as it is. This pipeline will further decimate stocks of salmon and trout in the lake. Fish follow flow and many fish will incorrectly swim towards the abstraction pipes when they are drawing water. Salmon have been listed as a protected species under the EU Habitat directive (Annex ii and V) and are vulnerable in Ireland. This pipeline does not protect the remaining salmon travelling up the Shannon system and places them at further risk. The European eel is a critically endangered species which will be subject to further decline also from this pipeline. Global warming is another key factor in future years. Lough Derg will be subject to further drought periods and with the added pressure of water abstraction there will be further increase in algal booms and foreign weeds in the lake.

Ecologically and economically this project is not feasible. It is estimated this project may cost, when the data is broken down appropriately, in the region of 10 billion euro. There are far better more local alternatives to supply Dublin including desalination and groundwater options. There are other options to draw water from more localised lakes nearby. It is reported that Dublin water leakage is in excess of 37% and we replace less than 1% yearly. How can a project comprehend a third of the water never making a tap and yet it is still deemed feasible. In reality it is not just the current but future generations that will be paying the large debt to cover this project. Efforts to fix the pipes should be done before any abstraction planning was submitted.

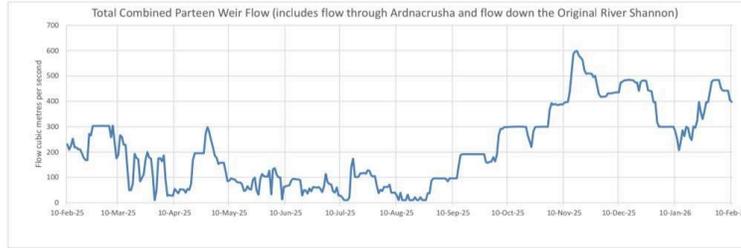
There is huge concern amongst anglers here at SFFC about whether we will be able to launch our boats from our boatshed during conditions of large abstraction or low water levels. We have over 60 boats and fishing goes back generations on Lough Derg. Images below depict water levels outside the boatshed from Feb 2026. Additional abstraction from the lake could end up having our boats beached permanently during periods of extended water abstraction. The next image depicts where the normal water level is. No safeguarding has been provided in the proposed project for people with boats on lower Lough Derg.





Current Total Combined Parteen Weir Flow (includes flow through Ardnacrusha and flow down the Original River Shannon)

10-Feb-26 09:00:00 398 cubic metres per second



Please note the following:

1. Note that ESB does not guarantee the accuracy of any data provided. It is the user's responsibility to independently verify and quality control any of the data used and ensure that it is fit for purpose/use. ESB does not accept responsibility for the use of any data made available, read or interpreted or used in any way by the user, or passed to a third party, and do not accept liability for any damage or loss howsoever arising out of the use or interpretation of this data.

Last 30 readings for Total Combined Parteen Weir Flow (includes flow through Ardnacrusha and flow down the Original River Shannon)

Timestamp	Value	Units
10-Feb-26 09:00:00	398	cubic metres per second
09-Feb-26 09:00:00	405	cubic metres per second
08-Feb-26 09:00:00	442	cubic metres per second
07-Feb-26 09:00:00	442	cubic metres per second
06-Feb-26 09:00:00	442	cubic metres per second
05-Feb-26 09:00:00	442	cubic metres per second
04-Feb-26 09:00:00	454	cubic metres per second
03-Feb-26 09:00:00	484	cubic metres per second
02-Feb-26 09:00:00	484	cubic metres per second
01-Feb-26 09:00:00	484	cubic metres per second
31-Jan-26 09:00:00	484	cubic metres per second
30-Jan-26 09:00:00	478	cubic metres per second
29-Jan-26 09:00:00	437	cubic metres per second
28-Jan-26 09:00:00	397	cubic metres per second
27-Jan-26 09:00:00	397	cubic metres per second
26-Jan-26 09:00:00	360	cubic metres per second
25-Jan-26 09:00:00	330	cubic metres per second
24-Jan-26 09:00:00	356	cubic metres per second
23-Jan-26 09:00:00	398	cubic metres per second
22-Jan-26 09:00:00	323	cubic metres per second
21-Jan-26 09:00:00	296	cubic metres per second
20-Jan-26 09:00:00	301	cubic metres per second
19-Jan-26 09:00:00	247	cubic metres per second
18-Jan-26 09:00:00	260	cubic metres per second
17-Jan-26 09:00:00	295	cubic metres per second
16-Jan-26 09:00:00	300	cubic metres per second
15-Jan-26 09:00:00	263	cubic metres per second
14-Jan-26 09:00:00	286	cubic metres per second
13-Jan-26 09:00:00	242	cubic metres per second
12-Jan-26 09:00:00	207	cubic metres per second

Please note the following:

1. Note that ESB does not guarantee the accuracy of any data provided. It is the user's responsibility to independently verify and quality control any of the data used and ensure that it is fit for purpose/use. ESB does not accept responsibility for the use of any data made available, read or interpreted or used in any way by the user, or passed to a third party, and do not accept liability for any damage or loss howsoever arising out of the use or interpretation of this data.

Finally there was significant disappointment in that the community scheme/fund is largely construction based compensation. The money will be distributed amongst county councils but there is no guarantee that any of the money will be used to improve the lake and associated waters even though it's the main resource of the project. A specific allocation should be made towards the lake that this project relies on. Funding toward LAWPRO to improve water quality for all lake and water users would be an excellent alternative. We would also ask for transparency in monitoring of water levels. An additional water meter on the Lower lake away from the basin would provide an additional sense of relief amongst anglers and could help build a better relationship between water users, uisce Eireann and ESB. It would be a visual marker whereby if the level drops below a certain cut off abstraction must be temporarily stopped or curtailed. This would allow residents to continue to use the lake and launch boats etc.

I hope that the resounding evidence to not proceed with this project is evident. This project is high risk, high cost and environmentally unsound. We urge the relevant authority to refuse planning permission.

Kind regards,

John Burns

SFFC Secretary

4 Hill Road,

Killaloe,

Co. Clare

V94Y3VR