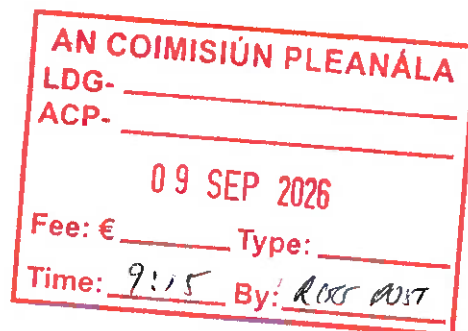


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MAULAKIEVE
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YOUR CASE NUMBER
ACP-324165-26

Dear Sir / Madam

I enclose my observations on the 'response to observations' by
messrs MKO as invited on 14 August 2026.

Yours Faithfully

I Collins

IAN COLLINS.

No fee requested.

I would like to preface my observation by a couple of aphorisms; one often locally quoted is 'Doctors differ and patients die' - the doctors here obviously being the expert opinions offered by the applicants and the objectors and the patient being a piece of mountainous terrain. The other perhaps slightly more obtuse comes from Quaxho Marx who said something along the lines of ... 'I have principles - and if you don't like them - I have others. I offer this because I met one of the observers engaged in the bird survey walking through my land in 2022-23 who answered my unasked question by stating in their opinion the bird survey alone would be enough to ensure that no wind farm would be allowed to be constructed here. I know this carries no weight behind it scientifically, but since no-one doubts the methodology or the results it is interesting to compare just how different the expert opinions of the interpretation of these observations have been. This is not just an academic spat but evidence of real doubt about predictable consequences. That is surely significant.

The site has been transformed within the last 50 years (the limit of my experience) by burning, over grazing (encouraged by Government policy) under grazing (the present policy) and afforestation. Turf cutting once localised is now almost non-existent. All these activities were enforced by poverty or encouraged through Government and EU policy. Perhaps the afforestation once seen as very positive change is now seen as degradation. It is no longer an option to just carry on the same path as now there is an increasing acceptance that there is a very important eco-system at work here which has a value whose contribution to our future well-being is being appreciated.

Not to repeat the mistakes of the past of developing and using this upland as if it had limited value or significance is of utmost importance. Fifty years ago it was considered as having no value to its owners, except to enable receipt of area based payments under farm subsidy schemes, until its potential for forestry was realised. Now that too

is seen as an ecologically damaging activity at least in its present monoculture form. Then sheep and cattle numbers grew as a result of EU policy to encourage increased production, now also seen as a damaging mistake that resulted in overgrazing. Next we have an acknowledged need to wean ourselves off fossil fuels, wind and solar farms are seen as the answer but they can still be a mistake too if the already damaged biodiversity is sacrificed to achieve that goal.

The afforestation can in time be reversed and cattle and sheep overgrazing has been curtailed. A wind farm on the other hand once established will be 'needed' for the foreseeable future. The demand for electricity generation will only increase and the infrastructure needed to use that energy will be permanent. Thus a wind farm is very far from being reversible once it is there it becomes far too valuable regardless of whether or not it is in a suitable location.

There appears to be a disjunct between the various surveys (which are deemed to be excellent examples of assessments of the biology and botany of the site) and the actual planning where assertions are made but not supported. It does seem that the actual planning on the ground of the project relied too much on third party reports rather than on first hand knowledge gained by site visits which would have resulted in a more robust appreciation of its characteristics.

I have known the site very well over a 50 year period and the decline in the observable wildlife has been shocking. Although I accept that this is not a scientific assessment it has formed a topic of conversations between neighbouring farmers for all that time. In other words it has been widely noticed as it has been happening. I wouldn't claim that the Maughanadea hills were teeming with observable wildlife but nearly every visit seemed to be an insight into the 'private lives' of the mammals and bird life that shared the space with our animals. The place has become quieter and sightings of mammals

and birds once commonplace are now less so to a marked degree. This proposal will only serve to make that situation worse. Of that there is definitely no doubt. Whether or not the gain of more energy production offsets that damage is one of opinion. However the biodiversity and bio-value of the site is at present protected by EU law and hence that opinion is not what is at stake here. It becomes one of is it lawful to grant permission for a wind farm at this site given what is now known. It is for the Commission to decide at this stage but ultimately it may come to be decided by the courts.

Here it bears commentating of the inequalities inherent to this planning process where a group of local residents has to collect over €20,000 to access specialist opinion and present it to counter the one-sided assessments in the presented EIA. The whole principle of this process is that the EIA should be a fair and balanced appraisal of the environmental effects and impacts not one (and this one is by no means alone) which is as obviously biased as this one. 'He who pays the piper calls the tune' but in order to enable the local community to be able to make a meaningful contribution to the planning process, surely some financial contribution from a potential developer should be required to pay for an independent review of their assertions and judgements.

Here are my comments requested (by section)

4.3.2.1. White tailed Eagle (WTE)

It is stated that there is too little evidence of activity to calculate the collision risk. This neglects the effect of the hoped for increase in the WTE population which is the whole point of the re-introduction program. The local population has increased since 2022-2025 when the walkover surveys were carried out. It is further stated that there is no evidence 'that the area in which the proposed wind farm site is located provides attractive thermals or corridors for travelling and hunting'. ... Equally there is no evidence presented that the converse is not the case. The type of terrain, its elevation its fauna and contours provide exactly the conditions to attract the WTE and other raptors which are similarly protected.

4.3.2.2 The response purely restates their (the consultants MKO's) position that they have dealt correctly and adequately within their EIA/R chapter 6 and 8. Their assessments have been comprehensively challenged by Dr Will O'Connor in the submission of Ms. Annabel Seymore which offers a very different view of their 'adequacy'.

4.3.2.3. Cumulative Effects.

The sections on each of the key ornithological receptors (KOR) is comprehensive in identifying the threats to each species that are considered in need of special preservation measures. As pointed out before many of these effects have been as a result of land use changes brought about in accordance with either national policy or EU policy which with hindsight were responsible for at least a part of the serious species decline which it is now sought to reverse. The past is what it is and measures to try to reverse species decline may be necessary to try to encourage the improvement of the biodiversity which is obviously in decline. It is only comparatively recently that the value of what has been lost has been appreciated and it roughly correlates with the growth in our use or abuse of our uplands. The large number of wind farm developments on such areas has been driven by the relatively high wind speeds there available and the lack of human habitations rendering them suitable for wind generation of electricity. The cumulative effects of this anthropomorphic activity is obvious but the evaluation of the contribution of each activity to the biodiversity decline is much more complicated. The developer's agents seek to minimise the direct effects of wind energy developments by calculating collision risks only and suggesting that there are no significant effects of habitat loss or displacement reported at any of the other wind farm sites in the area. There is no evidence of any assessments made (before and after) in relation to the construction of any of the mentioned wind farms, therefore there is absolutely no definitive data to back up these assertions. Not being an expert, merely an observer I cannot be authoritative but the species decline is undeniable. Here the combination of the 'precautionary principle' and the necessity under

Article 6(3) of the Habitats Directive to ensure.. "complete, precise and definitive findings capable of excluding adverse effects on the integrity of European sites beyond reasonable scientific doubt", becomes the significant paradigm. For a real step forward in assessing the effects of wind farms on the ecology of the area there is an overwhelming need of 'before and after' studies so that the effects can be understood and quantified before any more developments take place. The response to the threat of climate change must not cause greater problems than it solves. The historical lessons of the post industrial revolution are of the solutions to one problem leading to the creation of others.

"No significant residual effects of habitat loss, displacement or collision risk were reported for any other wind farms" is MKO's preferred conclusion in the case of each KOR. Who should have done this reporting and if it exists where is it available for scrutiny of its results and methodologies has not been detailed. I contend most strongly that these conclusions are not evidenced at all. Even a short search of the available literature demonstrates that observable significant deleterious effects have been documented elsewhere so to assume that the absence of reportage is evidence of absence of effect is baseless and demonstrably wrong.

I ask the Commission to refuse permission for this Manghanaclea wind farm for among many other reasons it has failed to demonstrate the reasoned magnitude of effects on the key ornithological receptors as required.



IAN COLLINS

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