



PETER SWEETMAN
And on behalf of
WILD IRELAND DEFENCE CLG

Appeal re: PAX16.324258 - Mayo County Council

REG.NO.	324258- Mayo CC
DESCRIPTION	The proposed development consists of up to 16 no. wind turbines (Tirawley Wind Farm), including a 110kV sub-station on site, an energy storage system in the form of a battery array located within container units and all associated infrastructure
ADDRESS	Located within the townlands of Ballymurphy, Ballynaleck, Barnhill Lower, Barnhill Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelackan Demesne, Castletown and others Co. Mayo.
APPLICIANT	Constant Energy Limited

Appeal submission by:

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Date: 25/06/26

1. REDIII application and assessment.

- 1.1 Wild Ireland Defence CLG ("WID") seeks to ensure projects are planned and delivered in full compliance with European Union and Irish environmental law. The present application has been submitted within the legislative context of Directive (EU) 2023/2413 ("RED III"), and the Planning Statement places reliance upon the Directive and the accelerated procedures introduced for renewable energy development.
- 1.2 While RED III seeks to streamline administrative procedures, it does not remove or dilute the substantive obligations imposed by the Environmental Impact Assessment Directive 2011/92/EU (as amended by Directive 2014/52/EU), Council Directive 92/43/EEC (Habitats Directive), Directive 2009/147/EC (Birds Directive), Directive 2000/60/EC (Water Framework Directive), nor the requirements of the Aarhus Convention concerning access to environmental information and effective public participation.
- 1.3 Accordingly, the accelerated decision-making procedures introduced under RED III cannot lawfully result in a lower evidential threshold, reduced environmental assessment or diminished public participation. Rather, the Commission must remain satisfied, on the basis of complete, accurate and scientifically robust information, that all statutory requirements have been fully complied with before development consent can lawfully be granted.

- 1.4 **Continued application of the Environmental Impact Assessment Directive:** Article 3 of the Environmental Impact Assessment Directive requires the environmental impact assessment to identify, describe and assess, in an appropriate manner, the direct, indirect and cumulative significant effects of the project upon, inter alia:
- biodiversity, with particular attention to species and habitats protected under the Habitats and Birds Directives;
 - population and human health;
 - land, soil, water, air and climate;
 - material assets and cultural heritage; and
 - the interactions between those environmental factors.
- 1.5 The obligation extends beyond identifying environmental receptors. It requires a complete assessment of all reasonably foreseeable impact pathways and the interactions between them. This obligation is reflected within Chapter 18 of the EIAR, which expressly acknowledges that environmental factors do not exist in isolation and that interactions must be assessed across all technical disciplines.
- 1.6 Accordingly, where one technical chapter identifies an environmental receptor or pathway that is omitted, treated differently or assessed on materially different assumptions elsewhere within the application documentation, the Commission must be satisfied that those differences have been fully explained and reconciled before relying upon the conclusions reached.
- 1.7 **Appropriate Assessment under Article 6 of the Habitats Directive:** Similarly, Article 6(3) of the Habitats Directive requires the competent authority to ascertain, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of any European Site having regard to its conservation objectives. The Natura Impact Statement explains that it has been prepared to assist the competent authority in carrying out this statutory assessment.
- 1.8 However, the Appropriate Assessment process cannot be viewed in isolation from the Environmental Impact Assessment. The EIAR identifies a substantially broader range of ecological receptors, habitats, species and environmental pathways than are necessarily considered within the NIS. Consequently, it is essential that the Commission be satisfied that every impact pathway identified within the EIAR which could potentially affect the conservation objectives or ecological functioning of European Sites has also been evaluated within the Appropriate Assessment process. The application presently contains no consolidated reconciliation schedule demonstrating this relationship.
- 1.9 **Water Framework Directive:** The Hydrology and Hydrogeology Chapter identifies the existence of a separate Water Framework Directive Compliance Assessment appended as Appendix 9.3. Compliance with the Water Framework Directive constitutes a separate legal obligation from both Environmental Impact Assessment and Appropriate Assessment. It requires consideration of deterioration, ecological objectives, chemical objectives, protected areas and the achievement of environmental objectives for every affected waterbody.
- 1.10 Wild Ireland Defence respectfully submits that compliance with the Water Framework Directive cannot simply be inferred from conclusions reached under the EIAR or Natura Impact Statement. Each legal regime pursues distinct statutory objectives and requires separate assessment against its own legal tests.
- 1.11 Accordingly, the Commission should ensure that the Water Framework Directive assessment transparently identifies every affected waterbody, every quality element assessed, every protected area objective considered and every pathway through which deterioration has been evaluated.

- 1.12 **Effective Public Participation:** The Aarhus Convention requires that members of the public be provided with sufficient environmental information to enable informed participation before development consent is granted. Where environmental information is incomplete, internally inconsistent, deferred until post-consent or incapable of independent verification, the ability of the public to participate effectively is materially diminished.
- 1.13 Wild Ireland Defence respectfully submits that this principle is of particular importance in applications of this scale where the proposed development extends across multiple environmental disciplines and relies upon numerous interrelated technical reports.
- 1.14 Where uncertainty exists, the appropriate response is not to assume compliance but to seek further information capable of being subjected to meaningful public consultation.
- 1.15 For the reasons set out above, Wild Ireland Defence submits that the Commission must be satisfied that the accelerated procedures introduced under RED III have not resulted in any reduction in the quality, completeness or transparency of the environmental assessment process.
- 1.16 Where material uncertainties remain, or where the interaction between the EIAR, Natura Impact Statement and other technical assessments cannot presently be verified, the Commission should exercise its statutory powers to seek comprehensive Further Information before determining the application.

2. Failure to Reconcile the Environmental Impact Assessment Report and Natura Impact Statement

- 2.1 Wild Ireland Defence is concerned that the Environmental Impact Assessment Report ("EIAR") and the Natura Impact Statement ("NIS") have been **prepaed** under separate legal regimes, by different specialist disciplines and for different statutory purposes, yet the application does not provide any comprehensive reconciliation demonstrating that the conclusions of one assessment are consistent with the other.
- 2.2 While the EIAR and the NIS serve different legal functions, they are not independent documents. They form part of a single planning application seeking one development consent. The Commission must therefore be satisfied that they are scientifically consistent and that all environmental pathways identified within one assessment have been appropriately considered within the other where relevant.
- 2.3 The absence of such reconciliation creates uncertainty as to whether all potential impact pathways have been fully identified and assessed before development consent is granted.
- 2.4 **Different Statutory Purposes Require Consistent Scientific Evidence:** The EIAR expressly states that Chapter 6 assesses the likely significant effects of the Proposed Development on terrestrial ecology, aquatic ecology and biodiversity generally throughout the construction, operational and decommissioning phases. The assessment encompasses habitats, flora, bats, aquatic ecology, biodiversity enhancement measures and residual ecological effects.
- 2.5 Similarly, Chapter 7 undertakes a detailed ornithological assessment including collision risk modelling, flight activity surveys, breeding bird surveys, winter surveys and operational effects upon bird populations.
- 2.6 By contrast, the Natura Impact Statement explains that its purpose is to assess the implications of the Project for European Sites having regard to their conservation objectives pursuant to Article 6(3) of the Habitats Directive.
- 2.7 These assessments therefore operate under different statutory tests. The EIAR asks whether the project is likely to give rise to significant environmental effects. The NIS asks whether the project can adversely affect the integrity of any European Site. Although these legal tests differ, both assessments rely upon the same environmental baseline, the same physical development and many of the same ecological pathways. Scientific consistency between the two documents is therefore essential.

- 2.8 The EIAR assesses a considerably wider range of ecological receptors than those assessed within the Natura Impact Statement. For example the EIAR assesses frogs / lizards and newts but does not appear to assess in the NIS. While this reflects the different statutory purposes of the Environmental Impact Assessment and Appropriate Assessment processes, no document has been provided reconciling those two assessments. Consequently, neither the Commission nor members of the public can determine whether ecological pathways identified during the EIA process were appropriately screened, carried forward or excluded from the Article 6 assessment, nor the scientific basis upon which those decisions were made.

3. Separate Legal Obligations under the Water Framework Directive

- 3.1 The Water Framework Directive establishes a separate statutory regime from both Environmental Impact Assessment and Appropriate Assessment. Whereas the EIAR considers significant environmental effects generally, and the Natura Impact Statement considers the integrity of European Sites, the Water Framework Directive requires assessment of impacts upon individual water bodies having regard to their ecological status, chemical status, hydromorphological conditions, protected area objectives and the prohibition on deterioration.
- 3.2 Accordingly, compliance with one environmental assessment regime cannot automatically be relied upon to demonstrate compliance with another. Wild Ireland Defence respectfully submits that the Commission should therefore satisfy itself that each of these legal tests has been independently addressed.

3.3 Hydrological Connectivity

The Hydrology Chapter identifies that the proposed development includes extensive engineering works including:

- turbine foundations;
- access tracks;
- drainage infrastructure;
- watercourse crossings;
- excavation works;
- spoil deposition;
- temporary construction compounds;
- cable installation;
- forestry clearance; and
- associated earthworks.

Each of these elements has the potential to alter existing drainage pathways, increase sediment mobilisation, alter runoff characteristics or create pathways for accidental pollution during construction and operation.

- 3.4 The Biodiversity Chapter similarly acknowledges that the Site is drained by the Cloonalaghan_010, Gortmore Stream (Mayo)_010 and Knockboha_010 sub-catchments and that downstream reaches support improved fisheries habitat, including salmonid nursery and spawning waters. The Commission should therefore be satisfied that the hydrological assessment has evaluated not only direct pathways but also indirect, cumulative and downstream pathways extending beyond the immediate footprint of the development.

- 3.5 Aquatic Ecology:** Appendix 6.3 to the EIAR comprises a detailed Aquatic Ecology Assessment, including biological water quality assessments, fisheries evaluation, aquatic habitat surveys and Water Framework Directive risk assessment methodologies undertaken at twenty survey locations. The assessment recognises that while upper reaches of the watercourses may currently be of relatively limited ecological value, downstream reaches provide improved habitat quality and support salmonid nursery and spawning habitat.
- 3.6** Wild Ireland Defence respectfully submits that this demonstrates that the assessment of impacts cannot be confined solely to the immediate construction footprint. The Commission must also consider downstream ecological consequences where alterations to water quality, sediment transport or hydrological processes may occur. Accordingly, further clarification should be provided demonstrating how the Water Framework Directive assessment evaluates these downstream ecological receptors.
- 3.7 Interaction with Biodiversity Assessment:** Chapter 18 of the EIAR identifies interactions between biodiversity and hydrology, recognising that contamination of surface water or groundwater could affect aquatic habitats, fisheries, otter, amphibians, reptiles and associated ecological receptors. The same chapter concludes that implementation of mitigation measures will avoid significant residual effects.
- 3.7 Water Quality Protection Measures:** The EIAR refers to ‘embedded mitigation’ including exclusion zones around watercourses, drainage controls and pollution prevention measures. While these measures are welcomed, the Commission should be satisfied that they are not used to screen out impacts for AA purposes (can they actually be classed as embedded) have been assessed against worst-case construction scenarios, including:
- extreme rainfall events;
 - accidental fuel or hydrocarbon release;
 - failure of temporary drainage controls;
 - sediment mobilisation from peat excavation;
 - cumulative impacts where multiple construction activities occur simultaneously.

Given the increasing frequency of extreme weather events associated with climate change, Wild Ireland Defence respectfully submits that the robustness of these measures should be demonstrated through explicit assessment rather than assumed.

3.8 Further Information Requested

Wild Ireland Defence respectfully requests that the Applicant provide:

1. A Water Framework Directive compliance matrix identifying every affected surface water and groundwater body together with its current ecological and chemical status.
2. A schedule identifying every quality element assessed under Article 4 of the Water Framework Directive, including biological, hydromorphological and physico-chemical quality elements.
3. A clear explanation of how deterioration has been assessed for each affected waterbody during the construction, operational and decommissioning phases.
4. Confirmation that all downstream fisheries habitats, salmonid nursery and spawning areas identified within the Aquatic Ecology Assessment have been explicitly considered within the Water Framework Directive assessment.
5. A reconciliation table demonstrating consistency between the Hydrology Chapter, Aquatic Ecology Assessment, Biodiversity Chapter, Natura Impact Statement and Water Framework Directive Compliance Assessment.
6. Details of the assumptions, modelling parameters and sensitivity analyses relied upon in reaching the conclusion that no deterioration of waterbody status will occur.

4. **Baseline Ecological Surveys, Survey Lifespan and the Need for Updated Ecological Information**

- 4.1 The reliability of any Environmental Impact Assessment and Appropriate Assessment depends fundamentally upon the accuracy and representativeness of the ecological baseline upon which the assessment is based. The environmental conclusions reached throughout the EIAR and the Natura Impact Statement are only as reliable as the survey information used to establish the existing ecological conditions.
- 4.2 Wild Ireland Defence notes that the Applicant has itself recognised the importance of this issue by including Appendix 6.5 entitled "*Note on Lifespan of Baseline Ecological Survey Data*" within the EIAR documentation. The inclusion of a dedicated appendix addressing survey lifespan demonstrates that the Applicant recognised the potential implications arising from the age of portions of the ecological baseline.
- 4.3 **Acknowledgement that Survey Data is Ageing:** The Ornithology Chapter expressly acknowledges that baseline ornithological surveys commenced during 2021 and were largely completed by 2023. The EIAR further states that the survey information is now approaching, or in some cases exceeds, three years of age when considered against the CIEEM Advice Note *On the Lifespan of Ecological Reports and Surveys* (April 2019). While the Applicant concludes that the existing data remain adequate, Wild Ireland Defence respectfully submits that this conclusion may not be legally safe and updated survey will be required. Intervening developments including associated grid connections may also have impact species and habitats surveyed
- 4.4 The issue is whether the Applicant has demonstrated, using objective evidence, that the baseline conditions upon which the environmental assessment relies remain representative at the time the competent authority determines the application.
- 4.4 **Different Survey Years Across Different Disciplines:** The application indicates that different ecological disciplines have been surveyed during different years.

For example:

- ornithological surveys principally extend from 2021–2023;
- bat surveys include additional survey effort during 2024 and 2026;
- aquatic ecology surveys were undertaken separately;
- the Natura Impact Statement refers generally to ecological information extending to 2024.

No consolidated schedule appears to have been provided identifying:

- the survey date for each receptor;
- the period of validity relied upon;
- whether any habitat changes have occurred since survey;
- whether any supplementary verification surveys have been undertaken;
- the scientific basis upon which older survey information continues to be relied upon.

4.5 Particular Importance for Highly Mobile Species

The issue of survey longevity is particularly important for highly mobile species.

Bird utilisation of landscapes can alter significantly between years in response to:

- forestry operations;
- habitat management;
- food availability;
- climatic conditions;
- disturbance;

- breeding success;
- changes elsewhere within the wider landscape.

Similarly, bat activity can alter following changes in hedgerows, woodland edges, forestry operations, lighting conditions and available roost sites. Wild Ireland Defence respectfully submits that where the Applicant has itself recognised the age of portions of the survey data, the Commission should carefully examine whether sufficient evidence has been provided to demonstrate that present ecological conditions remain consistent with those recorded during the original surveys.

4.6 Implications for the Environmental Impact Assessment and Appropriate Assessment

The Environmental Impact Assessment Directive requires assessment to be based upon adequate and reliable environmental information. Likewise, Article 6(3) of the Habitats Directive requires the competent authority to reach complete, precise and definitive findings capable of removing reasonable scientific doubt. Where uncertainty exists regarding the continuing validity of baseline ecological conditions, that uncertainty should be addressed through updated survey information rather than assumption. This is particularly important where the conclusions of the Environmental Impact Assessment and Natura Impact Statement depend upon species distribution, habitat utilisation, flight activity, breeding behaviour or ecological connectivity.

4.7 Further Information Requested

Wild Ireland Defence respectfully requests that the Commission require the Applicant to provide:

1. A consolidated schedule identifying every ecological survey undertaken, including survey dates, survey seasons and the ecological receptors covered.
 2. A statement identifying which ecological surveys have been updated since the original baseline work and the reasons for those updates.
 3. Confirmation that no material habitat changes have occurred within the Site, Grid Connection Route, Turbine Delivery Route or associated lands since completion of the baseline surveys.
 4. Updated verification surveys where significant habitat alteration, forestry operations or other land-use changes have occurred since the original surveys.
 5. A scientific justification demonstrating why ecological survey data exceeding the indicative lifespan referred to within the CIEEM Advice Note continues to provide an accurate representation of existing environmental conditions.
 6. Confirmation that the Natura Impact Statement, Water Framework Directive assessment and Environmental Impact Assessment all rely upon the same verified ecological baseline.
5. Landowner Consent, Red-Line Boundary Certainty and Identification of the Proposed Development
- 5.1 Wild Ireland Defence respectfully submits that the documentation accompanying the application does not presently enable either the Commission or members of the public to independently verify that valid landowner consent has been obtained for the entirety of the Proposed Development. This issue goes directly to the identification of the development for which permission is sought, the transparency of the planning process and the ability of interested parties to participate effectively within the meaning of the Aarhus Convention.
 - 5.2 Where a proposed development extends across numerous landholdings and comprises permanent works, temporary works, biodiversity enhancement measures, access improvements, drainage infrastructure, spoil deposition areas, grid infrastructure and construction compounds, it should be possible for the competent authority and members of the public to identify precisely which landowner has authorised each element of the proposed development.

5.3 Transparency and Effective Public Participation

The Aarhus Convention requires that environmental decision-making be transparent and that members of the public are provided with sufficient information to understand the nature and extent of the development for which consent is sought. Where ownership information is presented separately from engineering drawings and environmental assessment documentation, without a spatial correlation between them, members of the public are effectively required to speculate whether particular development components fall within land over which the Applicant has authority.

5.4 This is particularly important where temporary works extending beyond the Red-Line Boundary form part of the Proposed Development itself. Wild Ireland Defence respectfully submits that the planning documentation should enable an interested member of the public, by reference to a single integrated plan, to determine:

- the ownership of every affected parcel;
- the development proposed within that parcel;
- the environmental assessment applicable to that parcel; and
- the landowner consent relied upon.

The documentation presently available does not appear to provide that level of transparency.

5.5 Requirement for Legal Certainty

Planning permission authorises development upon land. Accordingly, the identity of the land comprising the Proposed Development must be capable of objective verification. Where a project extends across numerous landholdings and incorporates temporary construction areas, ancillary infrastructure and biodiversity enhancement lands, legal certainty requires that the relationship between ownership and development be readily ascertainable. Wild Ireland Defence respectfully submits that the present application does not appear to provide a single integrated document and map enabling such verification.

6. Failure to Assess the Planning Status and Cumulative Environmental Effects of Proposed Aggregate and Concrete Suppliers

6.1 The construction of the Proposed Development will require substantial quantities of rock, aggregate, sand, concrete and associated construction materials.

The EIAR identifies a number of existing quarries and concrete batching facilities as potential suppliers of these materials. Figure 17.7 identifies the following facilities within the local and regional area:

Quarries

- Barrets Quarry;
- Killala Rock Quarry;
- Lacken Stone;
- Mullafarry Quarry.

Quarry and Concrete Batch Suppliers

- Coolturk Quarries Ltd.;
- Harrington Concrete & Quarries;
- Molloy Concrete Limited.

Wild Ireland Defence respectfully submits that the inclusion of these facilities within the EIAR demonstrates that they form part of the anticipated construction logistics of the Proposed Development and are therefore capable of giving rise to cumulative environmental effects which require assessment.

6.2 Absence of Planning Status Assessment

The EIAR identifies the locations of the proposed aggregate suppliers. However, Wild Ireland Defence has been unable to identify any assessment confirming:

- whether each quarry currently benefits from a valid planning permission;
- the planning reference numbers applicable to each quarry;
- whether extraction is occurring entirely within authorised boundaries;
- whether each quarry possesses sufficient remaining permitted reserves to supply the development;
- whether existing planning permissions authorise the anticipated production levels;
- whether any substitute or alternative quarries may ultimately be required.

Without this information neither the Commission nor members of the public can determine whether the environmental assessment has been based upon authorised development or whether additional extraction may be required outside the scope of existing permissions. The planning status of these facilities is particularly important where cumulative environmental effects are relied upon within the EIAR.

6.3 Cumulative Assessment

Article 3 of the Environmental Impact Assessment Directive requires assessment of direct, indirect and cumulative effects. Where a project expressly identifies external quarries and concrete batching facilities as anticipated suppliers of construction materials, Wild Ireland Defence respectfully submits that the cumulative environmental consequences associated with those facilities should be assessed.

Such cumulative effects may include:

- additional mineral extraction;
- increased blasting activity;
- crushing and screening operations;
- concrete batching;
- dust emissions;
- noise and vibration;
- heavy goods vehicle movements;
- greenhouse gas emissions;
- impacts upon local roads;
- impacts upon nearby European Sites;
- impacts upon Water Framework Directive waterbodies;
- cumulative effects with other permitted quarry developments.

No comprehensive cumulative assessment appears to have been undertaken examining the interaction between the Proposed Development and the continued operation or increased utilisation of these extractive industries.

6.4 Reliance Upon Existing Authorised Development

The EIAR appears to proceed on the assumption that suitable aggregate and concrete supplies are available. However, the environmental assessment does not appear to demonstrate:

- whether sufficient authorised production capacity presently exists;
- whether temporary increases in extraction rates would be required;
- whether production limits imposed by existing planning permissions or EPA licences would be exceeded;
- whether additional environmental mitigation would become necessary at supplier sites;
- whether existing quarry Environmental Impact Assessments contemplated supplying a project of this scale.

These matters are directly relevant to cumulative assessment because the environmental consequences of supplying the Proposed Development may extend beyond the boundaries of the wind farm itself.

6.5 Transport and Climate Impacts

The identification of specific supplier locations also demonstrates that significant volumes of aggregate and concrete will require transportation over considerable distances. Are the emissions generated included in a lifecycle embedded carbon assessment?

Without this information it is not possible to independently verify that all indirect environmental effects associated with material sourcing have been assessed.

- 6.7** Wild Ireland Defence respectfully submits that where the Applicant has identified specific quarries and concrete batching facilities as integral components of the proposed construction strategy, the environmental consequences associated with those facilities cannot simply be treated as unrelated third-party developments. The Commission should be satisfied that the planning status, authorised production capacity and cumulative environmental effects associated with those facilities have been fully assessed before determining the application. In the absence of that information, Wild Ireland Defence respectfully submits that the cumulative impact assessment remains incomplete and that further information should be sought.

Conclusion.

For the reasons set out throughout this submission, Wild Ireland Defence respectfully submits that the application documentation does not presently provide sufficient information to enable the Commission to conclude, with the requisite degree of scientific certainty required by European Union and Irish law, that the proposed development complies with the Environmental Impact Assessment Directive, the Habitats Directive, the Birds Directive, the Water Framework Directive, the Planning and Development Acts and the requirements of effective public participation under the Aarhus Convention.

The deficiencies identified in this submission are not intended to constitute an exhaustive review of every aspect of the application. Rather, they identify a number of significant issues which, in the opinion of Wild Ireland Defence, require clarification and further environmental assessment before the Commission can lawfully determine the application.

Accordingly, Wild Ireland Defence respectfully requests that An Coimisiún Pleanála, in the first instance, refuse permission for the proposed development.

Without prejudice to that primary submission, and should the Commission not be minded to refuse permission, Wild Ireland Defence respectfully requests that comprehensive Further Information be sought from the Applicant in respect of the matters identified throughout this submission. Such Further Information should be sufficiently detailed to permit the Commission to undertake a complete and lawful assessment under all applicable statutory regimes and should be published for a further period of public consultation in accordance with the requirements of the Planning and Development Acts, the Environmental Impact

Assessment Directive, the Habitats Directive and the Aarhus Convention.

Wild Ireland Defence expressly reserves the right to make further submissions and observations on the substantive merits of the proposed development following publication of any Further Information, revised environmental assessments, updated surveys, amended drawings, additional modelling, revised mitigation measures or other documentation submitted by or on behalf of the Applicant. Such further submissions may address matters arising directly from the Further Information itself, as well as any additional legal, scientific, environmental or planning issues that become apparent upon review of the expanded application documentation.

Nothing contained within this submission should be construed as limiting or prejudicing Wild Ireland Defence's entitlement to raise additional matters arising from any subsequent material submitted during the course of the statutory process or from any amendments to the proposed development. The organisation respectfully reserves all rights available to it under Irish law, European Union law and applicable international obligations.

Yours Sincerely
Peter Sweetman

A handwritten signature in black ink, appearing to read 'Peter Sweetman', written in a cursive style.

Peter Sweetman
and on behalf of
Wild Ireland Defence CLG