



BirdWatch Ireland
protecting birds and biodiversity

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11/3/14
CC ESO
B123559

11th March 2014

Re. PA0033 Proposed Galway Harbour development SID lodged 10 Jan 2014
Inner Galway Bay SAC, SPA and cNHA

Dear Sir/Madam

BirdWatch Ireland has a number of significant concerns relating to potential impacts on the wild bird interests of the area identified and makes a number of comments relating to the adequacy of the ecological assessments accompanying this application.

Specifically, the inadequacy of the Natura Impact Statement and the conclusions that are drawn without sufficient information:

- A single year of data is collected so as to inform the decision-making process. While IWeBS data provides essential context information, this survey is not designed to assess potential impacts or relative importance and habitat usage across a given site.
- Lack of consideration of ecological needs of species particularly in extreme weather and potential impacts of the proposal on this
- Lack of assessment of cumulative impacts on the associated bird populations using the SPA
- The lack of rationale for determining the relative importance of the specific location in question
- Lack of full consideration of Mitigation measures and Alternatives in advance of IROPI considerations

It is our view that:

- the background information provided to draw conclusions relating to impacts on Natura features is not sufficient
- the NIS exercise presented are inadequate.
- the granting of consent without having completed robust assessment would not be in keeping with the EU Habitats Directive and EU Birds Directive requirements.

We would welcome the opportunity to discuss the details of this submission.

Yours sincerely

Siobhán Egan
Head of Policy, Communications & People Engagement



Directors: K. O'Byrne (Chairman) J Cromie, B Lavery, J O'Halloran, JB Peart, SP Roche, J. Wilson

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