



Summary--GBIFA.

The proposed development is planned for an area which is designated as a candidate Special area of Conservation, Special Protection Area and a proposed National Heritage Area. These designations become meaningless if developments such as the proposed harbour are permitted. It would be totally unreasonable and unacceptable to permit this massive construction within an area of such unique classification. The witness statement from Dr. Brendan O' Connor concluded that, adopting the precautionary principal, the habitat loss and impact on species is.....significant.

No stretch of the imagination could lead to the conclusion that this proposed development is a matter of Primary Infrastructural National importance. We believe the proposal cannot meet the legal "Imperative Reasons of Overriding Interest" (IROPI) requirement of the EU habitats directive. Galway is responsible for a mere 1% of National Port traffic. The National Ports Policy, 2013 (Dept. Transport, Tourism and Sport) does not classify Galway in Tier1 nor Tier2 amongst Ireland's ports. The Policy sees Galway's future plans in urban regeneration, marine leisure and tourism. It proposed to transfer the shareholder function to a more appropriate local or regional structure. Clearly, this is not the precursor to a massive National investment and the proposal does not meet the IROPI conditions.

In recent times the Harbour Company has attempted to claim that cruise ships will justify the investment. This is patently not the case. While over the years the justification varied amongst a whole range of supposed future activities, in the light of the Dept. policy document, the hat is now being hung largely on cruise ships. The location of Galway at the top of a shallow bay outside of which is the open North Atlantic makes it very difficult to attract operators to this port. The United Nations Environmental Programme has addressed the limited benefits ports of call gain from cruise ship business. They concluded that the "all inclusive" vacation package left little room for local people to benefit from tourism. "The facts from non- industry sources, including research-based analysis rather than general economic models, make clear that the actual economic benefits from cruise passenger spending rarely meet the industry's asserted levels, nor in some cases even come close to off-setting public costs associated with hosting cruise ships themselves." In was in the informed light of this knowledge that Cork Harbour, which already has 53 cruise ship visits booked for this year, decided that the construction of a simple stub pier(which would have been considerably shorter than the visiting vessel) in Cobh, could not be justified and will not proceed.

There has been no formal consultation by the proposers with our Association. Casual conversations were held on 2 occasions with individual members and without any agenda being available the Association was patently aware that this exercise was solely to tick the "local consultation" box. There was zero consultation with the Board of our Association. If there was any genuine concern about the livelihoods of our 24 members we should have received an invitation to a meaningful meeting before and during the drawing up of plans. If the proposers had bothered to consult they would have learned that this area is of extreme importance to the local inshore commercial fleet as it produces a significant volume of the annual shrimp (*Palaemon serratus*) harvest. It is also a recognized nursery area for juvenile shrimp during the Summer as well as an historical lobster fishing area. In the light of having ignored the local industry it is most annoying to read the EIS stating

"There will be no significant socio-economic impacts as a result of the proposed developments; therefore no socio-economic mitigation measures are required". Any type of enquiry whatsoever would have revealed that this area is by far the most productive area for shrimp in all of Galway Bay.

We have been told at this hearing that somehow Galway will be isolated if this development does not proceed. During the 70's and 80's Galway port thrived with movements of coal, timber, fertilizer, steel, meat, lead-zinc ore, oil and barites. There were 6 or 7 ships every week and ~~100~~⁴⁰ dockers were employed. Companies such as Coens, Hynes, Corbetts and Mc Donagh's were very active. The port has since faded and what has happened to Galway? It has thrived despite this imagined isolation. A single company in Galway (Boston Scientific) exported finished produce equivalent to the value of the entire Irish tourist industry only last year. The reality is that Galway could never justify this new harbour as it is without heavy industry and is within a short distance by the greatly improved road network to three Tier1 ports.

We have been told that the new facility could cater for 20,000T liquid cargo and 12,000T dry cargo vessels and we are also told that this will have no effect on the road network. The harbour could not pay for itself without a massive increase in traffic. Ringaskiddy container terminal was refused permission because there was no connection to national primary routes. Galway's road system is already regularly at a standstill with the current level of traffic and is incapable of carrying the required extra traffic which this harbour must generate if it is to be viable. The notion of a rail service must be recognized for what it is—a red herring.

Finally, if the promoters are genuine about the need for and benefits of a deep-water pier in the area then the limited national resources should be spent in Rossaveal where, for a tiny proportion of the cost, a deepwater berth could be built. The planning is currently in place for this facility and it would make excellent sense to put their energies into this project.