

Our Ref: Natural Gas Fired CCGT Power Plant
Your Ref: Port of Waterford

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31 July 2009

Dear Sir / Madam,

Natural Gas Fired CCGT Power Plant Great Island, Draft Scoping Report

On behalf of our client, the Port of Waterford Company (POWC), Colin Buchanan (CB) welcomes the opportunity to comment on the Draft Scoping Report produced with respect to a proposal by Endesa Ltd for a Natural Gas Fired CCGT Power Plant at Great Island, Co Wexford. This response is made in the context of this report, the purpose of which is to seek comments and information from key consultees contributing to the identification of potentially significant environmental issues relating to the proposed scheme. CB takes this opportunity to raise some concerns relating its potential impact on the Port's ongoing operations and highlights issues for consideration as part of the Environmental Impact Assessment.

The Port of Waterford is a strategic economic asset and protecting its current and future activities is of significant importance to the wider economy. The POWC pursues this objective by safeguarding port land, coordinating activities and land use, maintaining the conditions for future investment and enhancing operational efficiency and capacity. The Port and its functional features, shown in **Figure 1.1**, are situated approximately 3.5 km south west of the site. It is in the interest of the regional economy to ensure that the Port and its supporting infrastructure shown in **Figure 1.1** are protected going forward.

Consent of Port of Waterford proposed on 31 July 2009

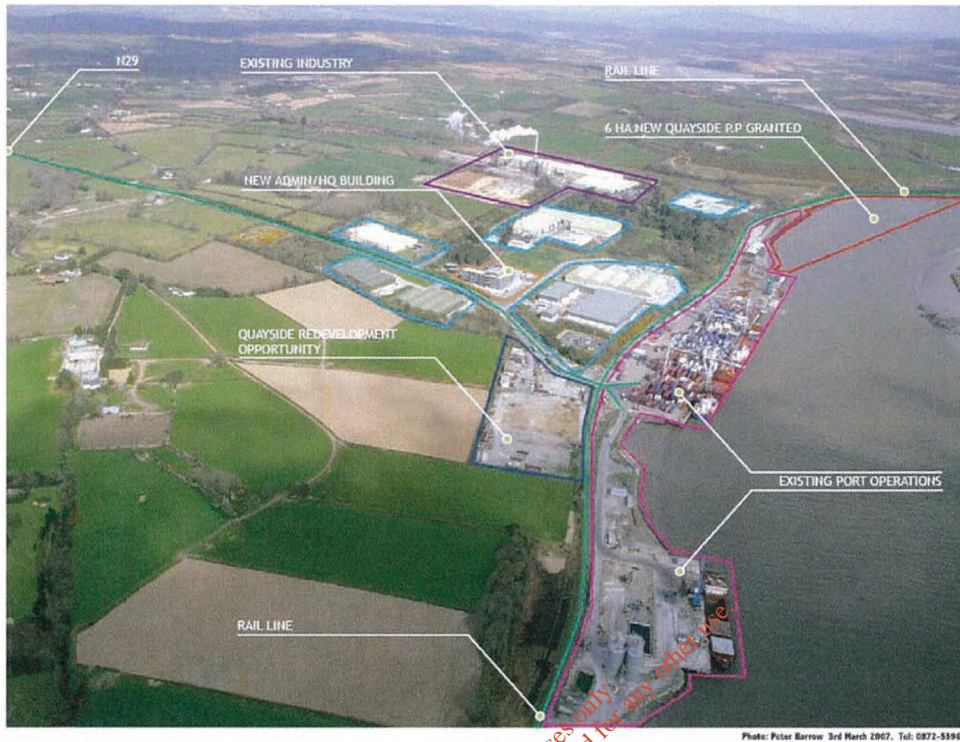


Figure 1.1 The Port Of Waterford: Current Operations and Future Plans

The Port of Waterford is the only port in the Country that is served by rail. Freight is currently transported by rail from the port, via the rail line passing directly north of and in close proximity to the Great Island site (See **Figure 1.2**). There are considerable benefits relating to this asset and the Port is in a strong position in respect of future development. This is acknowledged by Ports Policy Statement (2005) in stating that 'a crucial role of ports is to facilitate the movement of goods from sea to road and rail transport. It is expected that the ports would ensure seamless onward connections between the various modes'. It is therefore imperative that access including shipping lanes and potential transport routes to and from the Port should not be obstructed.

As a strategic economic asset, any likely effects on the operation of the port should be considered as part of the socio economic assessment within the EIS. Also, in the context of meeting emerging environmental obligations set by a number of European Directives, it is in the wider interest of all stakeholders to maintain the existing environmental capacity of the supporting environment. Potential impacts relating to water abstraction, quality of the of water discharging to the River Suir, and atmospheric deposition should be subject to consideration as part of an appropriate assessment under the Habitats Directive.



Photo: Peter Barrow 3rd March 2007. Tel: 0872-558438

Figure 1.2 Rail line passing North of the Site

CB acknowledge that the Scoping Report constitutes the initial stage in the process and further opportunities to comment on the full particulars of the development will arise. CB on behalf of the POWC welcome future consultations as details emerge and advise that additional information pertaining to the interests of our client may be sought should clarification be required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul McTernan'.

Paul McTernan

Director

paul.mcternan@cbuchanan.ie



Waterford Airport

27th July 2009

Angelika Grohmann -Wörle
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RE: Proposed Endesa CCGT Power Plant Great Island, Co. Wexford

Thank you for your recent correspondence regarding construction of a combined Cycle Gas Turbine power plant on the former ESB power plant site at Great Island. I would like to request further information regarding possible construction work or new external structures; in particular locations and heights (amsl) of these structures and any other details regarding the new facility that may have an impact on aviation activities for instance anticipated omissions etc.

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Yours sincerely

Aidan Power
Airport Manager

Waterford Regional Airport plc t/a Waterford Airport

Directors: N Fewer (Chairman) D Browne (Deputy Chairman) W Bolster T Cunningham J Crockett K Fitzgerald
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July 29, 2009

Introduction

Having first examined the Great Island project proposal it will not be necessary to repeat many of the comments made in that response as all of them apply to this project. The exceptions to this refer to the size of the plant and to the constraints imposed by infrastructural disparity. Reference to the high level of RE will be made and this point will be linked in with issues that may arise in the Wexford project. Technological issues will be addressed as will queries re water usage. Again, this topic can be linked in to the Great Island project.

Natural Gas (NG) Consumption and Global Matters, Trends & Impacts

Concerns arise in this area as a result of the level of NG that will be required in plant operation. It is supposed that the majority of this gas is expected to be supplied by gas from the Shannon Liquefied Natural Gas (LNG) import terminal. An Taisce has many reservations about the viability of the Shannon LNG project and is continuing to monitor that situation closely. Concerns arise not from Health & Safety matters but from global economic and geo-political trends and associated knock-on effects. Whilst LNG is being touted as delivering security of energy supply to the developed world, the fact remains that the sources of this LNG are politically unstable and/or flout human and democratic rights. From a point of view of policy the EU has flagged these issues in recent Foreign and Energy green papers. In addition, An Taisce is not convinced that the owners of Shannon LNG, HESS, will remove their suspension of the project in the short term as a result of:

- Current low global gas price
- Investment securing difficulties in current global economic downturn
- Financial issues facing the company at a global level

In the event that the Shannon LNG import terminal does NOT go ahead it would be prudent to have contingency plans regarding the sourcing of NG. Obviously, as has been acknowledged in the Great Island project comments, gas price and other global issues are not in the control of Endesa however these issues will impact enormously on the Endesa projects therefore risk analysis and contingency plans will be expected to appear in the EIS in the Socio-Economic Chapter. As a Spanish company, Endesa likely has first-hand experience of the LNG market given the high level of LNG import to Spain over the last 4 decades therefore the inclusion of this subject matter should not prove difficult.

It is not clear from the scoping document whether or not grid reinforcement and development will be required for the construction and commissioning of the Phase 1 plant. Whatever about 2012, it is, with not a modicum of certainty, likely that the global economy will be in strong growth once more by 2016. It is also likely that this growth will be in large part led by development in technology – specifically renewable energy technology – as a result of the high level of investment being pumped into that sector world-wide. This investment is also being made in Ireland as is evident from the following quote:

“SFI considers energy to be a key determinant in Ireland’s long-term economic competitiveness. For example, at present, there exists a shortage of engineering skills in the energy area. The emphasis of the strategy is on developing human capital in a

collaborative context and is a necessary measure to address this current shortfall. The implementation of the strategy is an exciting prospect, and, we are confident that this issue will be addressed. As with all other SFI initiatives, close and continual engagement with industry is at the heart of this strategy. The energy and environment sectors will provide strong economic growth and job creation in Ireland in the years and decades to come. The establishment of a specifically-tailored Strategy Research Cluster for energy will help to propel Ireland to the fore of this area.”

Director General of Science Foundation Ireland (SFI), Prof. Frank Gannon

An Taisce would like to see included in the EIS alternatives to the development of Phase 2 in the form of RE. As has been pointed out in this scoping report there is a high level of RE – mainly wind – in the area which puts a strain on the system:

“The phasing of the construction is required as there are currently transmission constraints on the South Western Transmission Grid which limits generation at Tarbert to peak load operation. This is mainly due to the large amount of renewable generation (mainly wind) that is coupled to the grid in this region. These constraints are likely to prevail in the short to medium term. It is Eirgrid’s stated policy to reinforce the grid in the region in the medium to longer term which will facilitate mid merit/base load generation at Tarbert. As the reinforcement of the grid network is not part of the Endesa project this will be subject to separate permitting.”

However with Grid and Network development and reinforcement which An Taisce is actively supporting and promoting (within reasonable parameters) this strain will be relieved and RE will most likely be accommodated relatively easily and quickly. It is with this in mind that alternatives to the plant in the form of RE would be welcomed especially so since the OCGT – Phase 1 – will form the most suitable complement to wind and its variability characteristics.

“ENDESA is active in the renewable energies and cogeneration sector in Spain via ENDESA Cogeneración y Renovables (ECYR), which commands a 10% market share.

At year-end, the on-stream cogeneration and renewable energy facilities in which ENDESA has an equity interest in Spain and Portugal represented total capacity of 3,330 MW gross, of which 2,791 MW corresponded to renewable energies and 539 MW to cogeneration and waste treatment.

Output from facilities in which ENDESA has a stake amounted to 6,775GWh in 2008, 4,130GWh of which came from energy installations, 632GWh from mini hydro. 1,428GWh came from cogeneration, including industrial clients and 585GWh from other technologies.

ENDESA has earmarked Euro 1.9 billion through 2009 to take its renewable energy installed capacity to 4,100 MW. As a result, these facilities will account for around 12% of ENDESA’s generation portfolio. This will mark a major step forward in the diversification of the company’s generation mix and put it on track to meeting its environmental protection targets. The Company plans to build 2,224 MW of new wind energy capacity,

78MW of mini hydro capacity, 103MW of solid waste-fuelled and biomass capacity and 20MW of co-generation capacity between 2005 and 2009.”¹

In addition to knowledge of LNG, Endesa obviously has vast experience in the RE sector and is actively investing in that strand of their business in Spain and Portugal with 11 wind-farms under construction in Spain and four in Portugal at end 2008. Therefore CBAs or other similar analysis of the RE potential development by Endesa in Ireland is seen as not only helpful but extremely constructive and in keeping with Irish RE policy.

An Taisce is aware that this gas project is cleaner than the existing plants AND that we will be better off as a nation regarding CO₂ and other emissions by burning gas as opposed to oil to generate electricity however, to use this as a main reason for developing the project is not seen as valuable. An Taisce would prefer to see convincing arguments from a point of view of business case and benefits to the nation.

The proposed staged construction at Tarbert power plant will allow a phased training of the staff and the workers to adapt their skills to the new technology.

The above is a statement from the scoping report. Clarity regarding the staff/workers to be trained is requested i.e. are they personnel currently in employment at the plant? Will all of them be needed given the new technology? Will there be a need to make some of them redundant? Does this therefore contradict statements about focusing on local employment in that whilst the current staff may be locally based, there will not be a need for significant numbers of new staff from the local area? Clarity on these areas would be most welcome.

Water

An area of concern with the proposed CCGT Power Plants is the use of groundwater. The proposed CCGT Great Island Power Plant in Co. Wexford will use groundwater supplied from a regionally important aquifer, while the proposed CCGT Tarbert Power Plant in Co. Kerry will use a locally important aquifer. Groundwater quality and quantity must be protected in their own right under the requirements of the WFD (2000/60/EC). The Groundwater Directive (80/68/EEC) and the WFD are the relevant pieces of EU legislation relating specifically to groundwater. The only specific standards related to groundwater in Irish legislation are the environmental quality standards set for Schedule 1 and Schedule 2 substances in the water pollution regulations (S.I. 271 of 1992). Article 17 of the WFD requires that the European Parliament and Council adopt measures to prevent and control groundwater pollution.

The impact of pressures on groundwater in the Republic of Ireland was used to prepare the Article 5 Characterisation and Risk Assessment Report for the Water Framework Directive (WFD). This report identified groundwater bodies that potentially have groundwater quality or over-abstraction problems, and monitoring data are required to verify the risk assessment in this report and help determine the status of each groundwater body. This report should be taken in to consideration within the EIA.

¹ http://www.endesa.es/Portal/en/our_business/cogeneration_renewables/default.htm

The Temperature Rise Assessment within the Environmental Impact Statement for the Combined Cycle Gas Turbine Power Plant Aghada in County Cork, showed that the

“...impact region from the combined discharge of the two outfalls will be confined principally to Whitegate Bay, its approaches and an 800 m to 1 km wide strip. The predicted average temperature rise in the bay is 1.5 – 2°C and 2.5 – 3°C on spring and neap tides respectively. Outside of Whitegate Bay along the shoreline from south of Corkbeg Island to north of the Aghada site the combined effect of the two outfalls is more noticeable with the average temperature rise being increased by approximately 0.5°C. At the cooling water intake the combined average temperature rise is 0.65°C and 1.2°C on spring and neap tides with a maximum instantaneous temperature rise of 2.25°C. Outside of this region the predicted average temperature rise is less than 0.5°C on a neap tide and less than 0.25°C on a spring tide. Little impact is predicted in the west section of Lower Cork Harbour as the hydrodynamic regime does not encourage cross flow from east to west”.

Similar temperature changes may be predicted for both the Tarbert and the Great Island Power Plants. However, the area just below the Great Island Power Plant has been designated as a New Shellfish Area under the Water Framework Directive. The temperature changes would have an impact upon aquaculture in this area. If the Pacific Oyster is cultivated here, the warmer waters as a result of the Power Plant discharge may result in the Oyster being able to breed. Currently the non-native Pacific Oyster is cultivated in Irish waters, but the spawning capacity of this species is limited by the lack of sufficiently high temperatures. However the warm water discharge may provide suitable conditions for this species to spawn successfully, causing adverse impacts to native oysters, benthic invertebrates, and the wider ecosystem. The Pacific oyster may establish itself in the Barrow Estuary and come into direct competition with resident native species for food and space. The EIA must examine the changes in water temperatures from the proposed development change in combination with climate change predicted temperature changes, and the effects on the flora and fauna; as well as the susceptibility from invasive species.

Water quality is threatened from both the direct and indirect effects of climate change. Direct effects include increasing water temperatures and changes in precipitation intensity together with associated reduction in the dissolved oxygen concentration. Indirect effects include the greater pressure exerted on the hydrological system from increased abstractions and discharges into watercourses. The Climate Change, Heritage and Tourism: Implications for Ireland's Coast and Inland Waterways (2009) report shows that conducted simulations indicate that all catchments will experience decreases in stream flow, most especially in late summer and autumn. Many of these stream flows may be responsible for the re-charging of groundwater supply.

Land-use changes are responsible for increased surface run-off, which also results in a decrease of groundwater re-charge. Furthermore, population growth and changing lifestyles impact water demand and supply. A study of the impact of climate change on water consumption, if unconstrained showed a rise in temperature of 1°C would lead to an increase in average domestic per capita demands of approximately 5%. Simulations suggest that demand will be greatest in the summer and autumn when the greatest reduction in surface water resources is also likely. Furthermore, increases in evaporation are likely to result in increased losses from storage reservoirs.

Agricultural demand will also be particularly sensitive to climate change². Therefore, groundwater supplies are going to become an increasingly precious resource.

Care must be taken to ensure all of the future possibilities (only a few of which have been mentioned) are addressed by the EIS to ensure that the developments proposed will not result in a shortage of suitable groundwater to meet future needs. Thus it is important that the Environmental Impact Statement assesses the cumulative impacts of these proposals with other pressures on the groundwater sources identified, including climate change. Globally, over the period 1961-2003, sea level rose at an average rate of 1mm yr⁻¹. However, an accelerated increase to 3.1 mm yr⁻¹ was observed over the 1993-2003 period. Warming of the oceans has occurred to depths of at least 3,000 meters and this, in turn, has resulted in thermal expansion which is estimated to have contributed 13.5% of the rise between 1993 - 2003.

In addition, the global change in ocean temperature is predicted to be a 2°C increase. However, these ranges may be significant underestimates as they do not include important uncertainties in the carbon-cycle feedback, such as the non-linear response of ice sheets to warming³. Increased sea level in conjunction with the increased in wave height and storm surge strength could result in greater salt water intrusion in the Groundwater of Great Island. Evidence of saltwater intrusions at Great Island has already been recorded⁴.

Finally, both the River Barrow estuary and the Lower Shannon estuary have been identified by the EPA as being at risk of not achieving good status by 2015 as required under the Water Framework Directive. The areas surrounding both the groundwater sources have also been labelled as being at risk of not achieving good status. The EIA's to be carried out for the proposed CCGT Power Plants must take this into account when looking at the developments in conjunction with the surrounding cumulative impacts.

Conclusion

It is acknowledged that some of these issues have been addressed verbally by Endesa during informal discussions however, it has been decided to include all issues in our comments document. This is because in An Taisce's experience these tend to be areas which lead to hold-ups in the planning process and if they are clearly outlined and explained from the outset, needless questions leading to equally needless delays are less likely to occur.

An Taisce would like to thank Endesa for the opportunity to make comments. If any further questions or comments arise please do not hesitate to contact us at energy@antaisce.org

² The Climate Change, Heritage and Tourism: *Implications for Ireland's Coast and Inland Waterways* (2009). Editors: Kelly, B., and Stack, M.

³ The Climate Change, Heritage and Tourism: *Implications for Ireland's Coast and Inland Waterways* (2009). Editors: Kelly, B., and Stack, M.

⁴ www.gsi.ie

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31st July 2009

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Re: Great Island, Campile, New Ross, Co Wexford,

Dear Angeleika

I would be grateful if you could include our views as part of your proposal, IFA would like to make the following brief points:

Submission

Road

Local people are concerned in the area that the existing road is rather narrow leading to the power station. This road needs to be up graded and widened to take the extra volume of traffic.

Information

More information is required on this project to inform the local people of how it will affect the local community and also to deepen their understanding of its impact.

Pollution

On the environmental impact statement what are the results of this and how will this impact on milk production and food production?
What type fuels are going to be used? How can emissions be minimized?

Yours sincerely,

Ger Lyons

Ger Lyons
Co Wexford IFA Chairman

From: David Fenton [mailto:dfenton@rpii.ie]
Sent: 17 July 2009 13:03
To: Pauline Kiernan
Subject: Gas Fired Power stations Tarbert and Wexford

Hi Pauline,

As per our conversation today, my Institute is the Statutory Authority in Ireland who deal with radioactive substances. This includes naturally occurring radioactive materials (NORM) that may be present in raw materials such as natural gas. The relevant legislation governing this area is the Radiological Protection Act, 1991 and the Ionising Radiation Order, 2000. You may like to note a report of assessments we have done, pursuant to this legislation, in a number of industries in Ireland including the gas extraction industry. NORM report 2008.

You probably should note that as the project develops it is likely that an assessment will be needed to determine if the radiation dose from the use of natural raw materials (natural gas) could give rise to a significant radiation dose to workers or members of the public. However for the moment I just wanted to email your company by way of introduction.

Please contact me should you require further information

Regards

David Fenton

Manager
Natural Radioactivity Advice Section
Radiological Protection Institute of Ireland
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6.3. Summary of Responses

Stakeholder	Sent	Response Received	Key Issues/Concerns	Relevant Chapter
Local Authorities				
Wexford County Council	Report	No	N/A	N/A
Waterford City Council	Report	No	N/A	N/A
Waterford County Council	Report	Yes	Air and climate; Impacts on water and Shellfish Areas in Waterford harbour; Impacts on ecology and Waterford Estuary SAC; Noise and vibration; and Landscape.	Chapter 15 Chapter 14 and 12 Chapter 12 Chapter 11 Chapter 16
Kilkenny County Council	Report	No	N/A	N/A
Governmental Departments				
Department of Communications, Energy and Natural Resources	Report	No	N/A	N/A
Department of Justice, Equality and Law Reform	Invite Letter	No	N/A	N/A
Department of Environment, Heritage and Local Government	Report	Yes	Archaeology and architecture; and Nature conservation.	Chapter 17 Chapter 12
Department of Enterprise, Trade and Employment	Invite Letter	E-mail response received indicating that they will not be making any comment	N/A	N/A
Department of Transport	Report	Verbally indicated that they will not be making any comment and that they passed it on to the NRA.	N/A	N/A
The Department of Agriculture, Fisheries and Food	Report	E-mail response received confirming receipt and indicating that a meeting would be necessary. A meeting was requested by the project team however DAFF were not available	N/A	N/A
Department of Community, Rural and Gaeltacht Affairs	Report	No	N/A	N/A

Proposed Power Plant at Great Island, Co. Wexford
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Stakeholder	Sent	Response Received	Key Issues/Concerns	Relevant Chapter
Department of Arts, Sport and Tourism	Invite Letter	No	N/A	N/A
Regional Authorities				
Health Service Executive - South (Kilkenny, Waterford, Wexford)	Report	Yes	Impacts on human health; Alternatives; Impacts of waste disposal; Discharges to water; Air emissions; Impacts on Shellfish; Flood risk; Construction workers; Noise and vibration.	Chapters 11 and 15 Chapter 2 Chapter 13 Chapters 13 and 14 Chapter 15 Chapter 12 Chapter 14 Chapter 9 Chapter 11
South East Regional Authority	Report	No	N/A	N/A
Eastern Regional Fisheries Board	Report	No	N/A	N/A
Southern Regional Fisheries Board	Report	Yes	Impacts on marine fauna during construction and operation.	Chapter 12
State/Semi-State Organisations				
An Bord Pleanála	Report	Written response received indicating that they will not be making any formal written submission.	N/A	N/A
Health Services Executive Head Office	Invite Letter	No	N/A	N/A
Environmental Protection Agency	Report	No	N/A	N/A
Commission for Energy Regulation	Invite Letter	No	N/A	N/A
National Roads Authority	Invite Letter	Yes	Visual impacts from existing national roads should be assessed; Cumulative impacts with regards to road networks should be included in EIS; EIS should be informed by Noise Regulations 2006; and Assessment should be made as to whether a road safety audit is required.	Chapter 16 Chapter 10 Chapter 11 Chapter 10
Office of Public Works	Invite Letter	No	N/A	N/A
National Parks and Wildlife Service	Report	No	N/A	N/A

Proposed Power Plant at Great Island, Co. Wexford
25755400007N

Stakeholder	Sent	Response Received	Key Issues/Concerns	Relevant Chapter
Geological Survey of Ireland	Invite Letter	Yes	The designation of important geological and geomorphological sites as NHAs;	Chapter 13
			Request copies of reports detailing site investigations carried out;	N/A
			Request notification of ground excavations for sampling purposes; and	N/A
			Request that significant bedrock cuttings remain exposed.	N/A
Fáilte Ireland	Invite Letter	No	N/A	N/A
Health and Safety Authority	Invite Letter	No	N/A	N/A
Heritage Council	Invite Letter	Yes	Impacts on flora and fauna; Impacts on archaeology and architecture.	Chapter 12 Chapter 17
Irish Aviation Authority	Invite Letter	Yes	Confirmed that they have no concern with stack heights of 60m.	N/A
Sea Fisheries Protection Authority Head Quarters	Report	No	N/A	N/A
Sea Fisheries Protection Authority Waterford Office	Invite Letter	No	N/A	N/A
An Garda Síochána	Invite Letter	No	N/A	N/A
Bord Iascaigh Mhara	Report	No	N/A	N/A
Central Fisheries Board	Report	No	N/A	N/A
Marine Institute	Invite Letter	No	N/A	N/A
Teagasc	Invite Letter	No	N/A	N/A
Sustainable Energy Ireland	Invite Letter	No	N/A	N/A
Iarnród Éireann	Report	Yes	Impacts on rail or lands in CIE/IE ownership.	N/A
Comhar Sustainable Development Council	Invite Letter	No	N/A	N/A
Companies				
Port of Waterford	Invite Letter	Yes	Impacts on socio-economics; Water quality; and Air quality.	Chapter 9 Chapters 13 and 14 Chapter 15
Bord Gáis Éireann	Info Letter	No	N/A	N/A
Eircom	Info Letter	No	N/A	N/A
Electricity Supply Board (ESB)	Info Letter	No	N/A	N/A

Proposed Power Plant at Great Island, Co. Wexford
25755400007N

Stakeholder	Sent	Response Received	Key Issues/Concerns	Relevant Chapter
Waterford Airport	Info Letter	Requested further information – forwarded Draft Scoping Report. No subsequent response received.	N/A	N/A
National Special Interest Groups				
An Taisce	Invite Letter	Yes	Level of natural gas consumption and global matters; Alternatives to the development of Phase 2 in the form of renewable energy; Employment; and Impacts on water, especially groundwater.	N/A N/A N/A Chapter 9 Chapters 13 and 14
ENFO	Invite Letter	No	N/A	N/A
Badgerwatch Ireland	Info Letter	No	N/A	N/A
Birdwatch Ireland	Info Letter	No	N/A	N/A
Bat Conservation Ireland	Info Letter	No	N/A	N/A
Irish Farmers Association	Info Letter	Yes	Road traffic; Impact on local community; Impact on local agricultural production; Fuel types; and Mitigation of emissions.	Chapter 10 Chapter 9 Chapters 8, 13 and 15 Chapter 3 Chapters 13, 14 and 15
National Museum of Ireland	Info Letter	No	N/A	N/A
Radiological Protection Institute of Ireland	Info Letter	Yes	Refers to Radiological Protection Act, 1991 and Ionising Radiation Order, 2000; Refers to report of assessment on gas extraction industry, NORM report 2008; and Indicates that it is likely that an assessment is needed to determine the radiation dose from the natural gas.	N/A N/A N/A
Irish Whale and Dolphin Group	Info Letter	No	N/A	N/A
Irish Wildlife Trust	Info Letter	No	N/A	N/A