

25 September 2025

Office of Environmental Sustainability  
Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford

**RE: EPA Industrial Emissions Licensing Application P1181-02**

Dear Sir/Madam,

On behalf of the applicant, Amazon Data Services Ireland Limited, we submit an Natura Impact Statement (NIS) in response to the request dated 30 July 2025 to submit a Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended.

This is included with this submission as:

- ▶ Attachment-6-3-4-NIS-Licence-Sept-2025

In addition, a full review of the Licence Review application documentation has been undertaken, these have been updated to reflect the findings of the NIS, and a review has been undertaken to ensure consistency across the submitted application documentation.

In relation to updates made to documentation, the primary revisions relate to the following:

- ▶ Update to the Thermal Capacity of the Emergency Back-up Generators as advised to the EPA in the response to the further information request submitted 22 September 2025.
- ▶ Update to the maximum potential fuel use per year (revised Attachment 4-6-1-Water-Energy-Usage was included as part of the further information request submitted 22 September 2025).
- ▶ Revised air dispersion modelling as a result in amendments to the stack diameter of the emergency back-up generators (Building B), inclusion of the SSE Generation Ireland Ltd (EPA Ref.: P1225-01) to the air quality cumulative impact assessment and a reduction in emergency generator run hours from 300 hours per generator year, to 100 hours per generator year, to align with the permitted development.
- ▶ In addition, all information provided in response to the further information request submitted 22 September 2025 has been incorporated into the revised documents for completeness.

The following documents / revised attachments are submitted with this response:

- ▶ Attachment-1-2 Non Technical Summary-Rev
- ▶ Attachment-4-4-1-Activity Capacity Calculations\_Rev
- ▶ Attachment-4-6-2-Raw-Material-Interm-Products\_Rev
- ▶ Attachment-4-7-3-BREF-Emissions from Storage\_Rev
- ▶ Attachment-4-7-4-BREF-Industrial Cooling Systems\_Rev
- ▶ Attachment-4-8-1 Operational Report\_Rev
- ▶ Attachment-6-1-Stakeholder-Engagement\_Revised\_Rev

**HEADQUARTERS**

- ▶ Attachment-6-3-1-ABP Decision-Apr-2021
- ▶ Attachment-6-3-1-ABP Report-Apr-2021
- ▶ Attachment-6-3-4-AA Screening ABP-Apr 2021
- ▶ Attachment-6-3-6-EIAR-ABP-Apr 2021
- ▶ Attachment-7-1-3-1-Emissions Compliance Report\_Rev
- ▶ Attachment-7-1-3-2 Air Emissions Impact Assessment\_Rev
- ▶ Attachment-7-1-3-2-Soil & Water Impact Assessment\_Rev (including Appendix A – Technical Note: Stormwater Impact Assessment, i.e. the assimilative capacity assessment)
- ▶ Attachment-7-4-2-Emissions-to-Air-Minor-Potential\_Rev
- ▶ Attachment-7-7-1 Stormwater Monitoring\_Rev
- ▶ Attachment-7-7-Storm-Water-Discharges\_Rev

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'G' followed by a horizontal line.

Jonathan Gauntlett  
Associate  
AWN Consulting