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Valentia Island Energy Ltd

VI Energy

NMPF Compliance Statement

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1. INTRODUCTION

The development and operation of Valentia Island Energy Ltd is cognisant of the High-Level Objectives outlined in the National Marine Planning Framework (NMPF) published in 2021. These objectives mirror (and are guided by) those being adopted globally, namely, the United Nations Sustainable Development Goals. Below is a table identifying these objectives and the NMPF policies that they include.

High Level Objective	Policy Grouping	Planning Policies
Environmental – Ocean Health	Environmental – Ocean Health	Environmental – Ocean Health Policy 1
	Biodiversity	Biodiversity 1
		Biodiversity 2
		Biodiversity 3
		Biodiversity 4
	Protected Marine Sites	Protected Marine Sites 1
		Protected Marine Sites 2
		Protected Marine Sites 3
		Protected Marine Sites 4
	Non-indigenous Species	Non-indigenous Species 1
	Water Quality	Water Quality 1
		Water Quality 2
	Sea-floor and Water Column Integrity	Sea-floor Integrity 1
		Sea-floor Integrity 2
		Sea-floor Integrity 3
	Marine Litter	Marine Litter 1
	Underwater Noise	Underwater Noise 1
	Air Quality	Air Quality 1
		Air Quality 2
	Climate Change	Climate Change 1
		Climate Change 2
Economic – Thriving Maritime Economy	Co-existence	Co-existence 1
	Infrastructure	Infrastructure 1
Social – Engagement with the Sea	Access	Access 1
		Access 2
	Employment	Employment 1
	Heritage Assets	Heritage Assets 1
	Rural Coastal and Island Communities	Rural Coastal and Island Communities 1
	Seascape and Landscape	Seascape and Landscape 1
	Social Benefits	Social Benefits 1
		Social Benefits 2
	Transboundary	Transboundary 1

Figure 1: National Marine Planning Framework Objective breakdown

2. Objective Compliance

2.1. Environmental - Ocean Health

The following policy groupings are identified under this objective and are discussed below in relation to the survey works to which the foreshore licence application relates and the development and operation of Valentia Island Energy Ltd itself. For completeness, we have assessed both the project's survey phase and its wider operational scope.

2.1.1. Protected Marine Areas

Survey Works: Valentia Island Energy Ltd has identified all protected areas within the Zone of Influence of the survey works. Any areas within the Zone of Influence will see the impacts minimised and mitigated during the survey works.

Project Scope: Proximity and connectivity to designated / protected areas was a key consideration in site selection phase. Valentia Island Energy Ltd has identified all protected areas within the Zone of Influence of the project. Any areas within the Zone of Influence will see the impacts minimised and mitigated during the lifetime of the project.

2.1.2. Biodiversity

Survey Works: There will be temporary impacts due to certain survey works. Best practice guidelines will be adopted and any impacts that can't be avoided will be minimised and mitigated.

Project Scope: Valentia Island Energy Ltd.'s intention is to explore the installation of restoration reefs that will not only protect the biodiversity in and around the area of the project but may potentially enhance it beyond its current status, as suggested by evidence from the reef supplier's ongoing global projects.

2.1.3. Non-Indigenous Species

Survey Works: All necessary measures and practices will be put in place during the survey works to ensure non-indigenous species are not accidentally introduced to the environment. All operating personnel will be trained on these preventive measures and a Best Practice approach will be implemented for the survey works.

Project Scope: All necessary measures and practices will be put in place during the lifespan of the project to ensure non-indigenous species are not accidentally introduced to the environment during maintenance. All operating personnel will be trained on these preventive measures and a Best Practice approach will be implemented for the survey works.

2.1.4. Water Quality

Survey Works: Valentia Island Energy Ltd is aware that water quality may be affected temporarily during survey works and has accounted for this in their design (of intrusive works) so the impact will be minimised. As with all marine traffic, there is a risk of fuel leakage from vessels used. Valentia Island Energy Ltd has developed contingency plans to be implemented in the event of a fuel leakage and will operate to Best Practice guidelines and site-specific Environmental Management plans.

Project Scope: Valentia Island Energy Ltd is aware that water quality may be affected during the lifespan of the project and has accounted for this in their design so the impact will be minimised. Valentia Island Energy Ltd will operate to Best Practice guidelines and site-specific Environmental Management plans during the lifespan of the project.

2.1.5. Seafloor And Water Column Integrity

Survey Works: There will be some temporary sediment displacement during the initial survey works for Valentia Island Energy Ltd. Surveys will be designed to have least the possible impact on the environment.

Project Scope: Valentia Island Energy Ltd.'s intention is to explore the installation of restoration reefs that will not only protect the biodiversity in and around the area of the project but may potentially enhance it beyond its current status, as suggested by evidence from the reef supplier's ongoing global projects.

2.1.6. Marine Litter

Survey Works: Possible marine litter as a result of survey works will be accounted for in the planning and design stage for these works. Valentia Island Energy Ltd has developed contingency plans to be implemented in the event of marine litter and will operate to Best Practice guidelines and site-specific Environmental Management plans.

Project Scope: Possible marine litter as a result from the operation of Valentia Island Energy Ltd may arise during maintenance works. For the duration of the lifespan of Valentia Island Energy Ltd, the site-specific Environmental Management will be followed to avoid, minimise and mitigate marine litter.

2.1.7. Underwater Noise

Survey Works: Valentia Island Energy Ltd assessed the impact of underwater noise on marine fauna in its initial application for a Foreshore Licence as part of the suite of ecology reports prepared. Where underwater noise is unavoidable, Valentia Island Energy Ltd has accounted for this in survey design to minimise the impact on marine life using MMO and PAM operators.

Project Scope: There will be low levels of noise from vessels during maintenance works on the Valentia Island Energy Ltd. Best Practice guidelines will be followed throughout the lifespan of the project.

2.1.8. Air Quality

Survey Works: There will be minimal impact on air quality during the survey works as modern efficient vessels will be used with low sulphur fuel as standard.

Project Scope: Once completed, Valentia Island Energy Ltd will contribute towards Ireland's migration from non-renewable energy sources to more sustainable alternatives. The wider availability of cleaner energy sources will lead to an overall improvement in air quality locally and potentially on a transboundary basis.

2.1.9. Climate Change

Survey Works: There will be minimal emissions of greenhouse gases during the survey works as modern efficient vessels will be used with low sulphur fuel as standard.

Project Scope: Valentia Island Energy Ltd contributes to various Irish and European goals in migration from non-renewable energy sources towards more sustainable alternatives. The wider availability of cleaner energy sources will lead to an overall nett benefit from a climate change perspective as the country seeks to achieve its 2030 goals.

2.2. Economic-Thriving Marine Economy

The following policy groupings are identified under this objective and are discussed below in relation to the survey works to which the foreshore licence application relates and the development and operation of Valentia Island Energy Ltd itself. For completeness, we have assessed both the project's survey phase and its wider operational scope.

2.2.1. Co-Existence

Survey Works: Valentia Island Energy Ltd will work with other marine users during survey works designs to ensure there is no user conflicts in the marine space for the duration of these works. A full time Fisheries Liaison Officer (FLO) has been appointed to facilitate communications between the project team and other users in the areas where the surveys will occur.

Project Scope: Throughout the lifespan of Valentia Island Energy Ltd, multi-use practices which can be integrated within the Valentia Island Energy Ltd site itself will be pursued. These longer-term plans / options will be discussed with interested parties as part of the planning permission / development consent process.

2.2.2. Infrastructure

Survey Works: Existing infrastructure will be utilised during survey works. It is not envisaged that new facilities will be required. Where possible, and where capacity exists, local supply chain will be utilised.

Project Scope: Any infrastructural developments that may be required for Valentia Island Energy Ltd will be identified with the community and will be supported through stakeholder engagement with the relevant parties. This will likely include port and harbours, turbine manufacturing / assembly, warehousing, logistics and will likely lead to regeneration and diversification projects.

2.2.3. Social-Engagement With the Sea

The following policy groupings are identified under this objective and are discussed below in relation to the survey works to which the foreshore licence application relates and the development and operation of Valentia Island Energy Ltd itself. For completeness, we have assessed both the project's survey phase and its wider operational scope.

2.2.4. Access

Survey Works: Access to ports infrastructure and harbours will not be impeded by the survey works of Valentia Island Energy Ltd. Where existing port and harbour users identify issues with access due to these works, Valentia Island Energy Ltd will work with these users through stakeholder engagement to help avoid, minimise and mitigate these issues.

Project Scope: Access to local infrastructure that will be required for Valentia Island Energy Ltd will be identified with the community and will be supported through stakeholder engagement with the relevant parties. Where increased capacity of port and harbours, turbine manufacturing / assembly, warehousing, logistics etc. are required, this will be planned as part of the overall project plan and will likely lead to regeneration and diversification projects.

2.2.5. Employment

Survey Works: Where possible, local residents with the necessary qualifications will be encouraged to apply for roles available for the duration of the survey works. Where possible and where capacity exists, local supply chain will be utilised.

Project Scope: Valentia Island Energy Ltd is dedicated to providing training, where there is interest, to residents of these communities with a view to diversifying their skills and enabling employment in these emerging marine industries. Where possible and where capacity exists, local supply chain will be utilised.

2.2.6. Heritage Assets

Survey Works: All Heritage Sites within the vicinity of Valentia Island Energy Ltd were identified in the desktop study and avoided in terms of development and construction. Any heritage sites discovered during the survey works will be made known the National Monument Service.

Project Scope: Any heritage sites discovered during the survey works will be made known the National Monument Service and, if required, the project scope can be altered to help preserve such assets via exclusion zones etc.

2.2.7. Rural And Coastal Communities

Survey Works: Valentia Island Energy Ltd, through stakeholder engagement, will identify community concerns about survey works and address these. A full time Fisheries Liaison Officer (FLO) has been appointed to facilitate communications between the project team and other users of the areas where the surveys will occur. Where possible and where capacity exists, local supply chain will be utilised.

Project Scope: Valentia Island Energy Ltd, through stakeholder engagement, will identify community concerns and address these, where possible, through skills development, employment opportunities and social benefits to these communities. Where possible, and where capacity exists, local supply chain will be utilised.

2.2.8. Seascape And Landscape

Survey Works: A slight increase in vessel movement in the area will be experienced but this will be a short term and minimal impact.

Project Scope: Valentia Island Energy Ltd will be a permanent fixture on the seascape. However, the site was chosen due to it having minimal visual impact due to its distance from receptors. 3D models will be used to demonstrate the potential impacts, and this will be assessed in detail in the planning permission / development consent process.

2.2.9. Social Benefits

Survey Works: Valentia Island Energy Ltd will provide social benefits such as employment opportunities to those within the local community during survey works. Where possible and where capacity exists, local supply chain will be utilised.

Project Scope: Valentia Island Energy Ltd will provide social benefits such as infrastructure development, training, economic diversification, educational and tourism opportunities to those within the local community. Valentia Island Energy Ltd will work closely with the local community through stakeholder engagement to identify what social benefits are desired by the community, and support those which are viable.

2.2.10. Transboundary

Survey Works: The Valentia Island Energy Ltd survey works extend beyond Ireland's 12 nautical mile limit but remains within our Exclusive Economic Zone. There are no transboundary issues expected during the survey works as all impacts will be localised. Notwithstanding this, mobile species and the potential impact on same, will be monitored using MMO and PAM operators.

Project Scope: Valentia Island Energy Ltd extends beyond Ireland's 12 nautical mile judicial limit but remains within our Exclusive Economic Zone. There are no negative transboundary issues identified for the project. The completed Valentia Island Energy Ltd project will contribute towards Ireland's migration from non-renewable energy sources to more sustainable alternatives. The wider availability of cleaner energy sources will lead to an overall improvement in air quality locally and potentially on a transboundary basis.

3. Conclusion

Based on this review, we suggest that Valentia Island Energy Ltd is consistent with the objectives laid out in the National Marine Planning Framework. Specifically, we would conclude that the Valentia Island Energy Ltd project will achieve the following:

- appropriate enhanced and inclusive public access to and within the maritime area, and considerations in respect of the future provision of services for tourism and recreation activities;
- through the proposed mitigation and habitats development, the enhancement of species adaptation and habitat connectivity;
- avoidance of adverse changes to physical features of the coast;
- contribution to a net increase in marine related employment in Ireland, particularly in Irish coastal communities adjacent to the maritime area;
- support appropriate land-based infrastructure which facilitates marine activity;
- facilitation of the diversification or regeneration of marine industries;
- inclusion of measures (such as development of a waste management plan) to mitigate marine litter;
- increase of the understanding and enjoyment of the marine environment (including its natural, historic and social value);
- consideration of the transboundary impacts throughout the lifetime of the proposed activity;

- consideration of the spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna;
- consideration and mitigation of the likely significant impacts of a development on the seascape and landscape of an area;
- development of a risk management approach to prevent the introduction of and / or spread of non-indigenous species; and
- consideration of how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate.

On the basis of the above, we believe Valentia Island Energy Ltd is, in all of the aforementioned aspects, considerate of the National Marine Planning Framework.