



Luxembourg, 04/10/2022

## Environmental and Social Data Sheet

### Overview

Project Name: *CELTIC INTERCONNECTOR*  
 Project Number: *2018-0149*  
 Country: *Ireland*  
 Project Description: *The Project concerns the implementation of a High Voltage Direct Current (HVDC) link interconnecting France and Ireland across the Celtic Sea. The Project will have a rated capacity of 700 MW, DC voltage of 320 kV and a total route length of 575 km, of which 500 km offshore. The offshore route of the Project will cross French, British and Irish waters.*

EIA required: *yes*

*(If EIA is required by EU law or by the Bank, ensure that for projects inside and outside EU the full EIA/EIS, as well as the NTS, where appropriate, is sent to the [\\_register@eib.org](mailto:_register@eib.org), or provide here the necessary information, such as condition for 1<sup>st</sup> disbursement, other...)*

Project included in Carbon Footprint Exercise<sup>1</sup>: *yes*

*(details for projects included are provided in section: "EIB Carbon Footprint Exercise")*

### Environmental and Social Assessment

#### Environmental Assessment

The Project consists of the following main components:

- A bipole converter station in Knockraha (Cork, Ireland).
- 2 x 32 km of underground land cable in Ireland.
- 2 x 500 km of submarine cable, crossing the Territorial Waters (TW) and Exclusive Economic Zone (EEZ) of Ireland, the EEZ of Great Britain, and the TW and EEZ of France.
- 2 x 40 km of underground land cable in France.
- A bipole converter station in La Martyre (Brittany, France).

The Project connects to Eirgrid transmission network at the 220 kV substation in Knockraha and to RTE high voltage network via the La Martyre 400 kV substation.

Given its technical characteristics, the Project does not fall under either Annex I or Annex II of the EIA Directive. The Project is subject to various permitting regimes in Ireland, Great Britain and France as described in the below paragraphs. According to national legislations, the Project was screened in for an EIA in France and Ireland (both for the on-shore and the off-shore components), while an EIA was not required for the part of the Project crossing Great Britain's waters. Two separate EIA have been carried out in Ireland for the onshore and offshore

<sup>1</sup> Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO<sub>2</sub>e/year absolute (gross) or 20,000 tonnes CO<sub>2</sub>e/year relative (net) – both increases and savings.



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sections, respectively, following pre-application consultations with the respective competent authorities. As the Project is a PCI, the requirements of the TEN-E regulation 347/2013 also apply to the issuing of permits and public participation.

### **Ireland Onshore**

Planning permission under the Planning and Development Act 2000 (as amended) is required for the converter station and the onshore cables up to the landfall point located at Claycastle Beach. The competent authority - An Bord Pleanála - issued the relevant planning permission and the favourable EIA decision, which integrated the considerations on Natura 2000 sites, on 20/05/2022.

The Project has the potential to interact with the Natura 2000 sites Great Island Channel SAC (IR001058; 1.7km), Ballymacoda SAC (IR000077; 2.8km), Ballymacoda Bay SPA (IR004023; 1.4km), Blackwater River SAC (IR002170; 1.4km), the Cork Harbour SPA (IR004030; 1.9km), the Blackwater Estuary SPA (IR004028; 2.4km) and the Mullaghanish to Musheramore Mountains SPA (IR004162). An Appropriate Assessment screening determined that likely significant disturbance to the identified sites could not be ruled out and the Project was therefore subject to Appropriate Assessment in line with Article 6.3 of the Habitats Directive. Taking into account the mitigation measures proposed in the Natura Impact Statement annexed to the Project application, the assessment concluded that the Project, by itself or in combination with other plans or projects, would not adversely affect the integrity of the identified sites, in view of the sites' conservation objectives.

The Promoter has the capacity and is committed to implementing the necessary mitigating measures at both design and construction stages. These typically include applying international and national health and safety regulations and communication with local communities, measures to reduce emissions and ensure air quality, soil restoration, flood risk assessments and routing selection to improve resilience, translocation then restoration of calcareous grassland, protection measures for bats, red squirrels, pygmy shrews, hedgehogs, stoats, smooth newts and frogs, viviparous lizards, breeding birds in general and winter raptor roosts, special construction procedures to minimise damages and disturbance, protection of archaeological material, traffic management measures, appropriate waste collection procedures and others.

For the operational phase attention will be dedicated to: proper maintenance (with particular reference to SF6 substation), on-site drainage systems to address flooding risk, habitat management to preserve species and enhance impacted vegetation (orchid-rich grassland, hedgerows, treelines and grassland verges), equipment selection to limit sound power levels and waste management with permitted contractors and authorised destinations.

### **Ireland Offshore**

A Foreshore Licence is required under the Foreshore Act 1933 (as amended), which covers licensing of the offshore cables in both the Irish Territorial Waters (TW) and Exclusive Economic Zone (EEZ). The Department of Housing, Local Government and Heritage is the consenting authority. The licence application was submitted in June 2021 with permit approval not yet issued at current time and according to the Promoter expected in August 2022.

A full EIA was required for the foreshore licence. Based on the EIA report prepared by the Promoter, with the implementation of appropriate mitigating measures, the Project is predicted to have no significant negative effect on the environment.

The Promoter has the capacity and is committed to implementing the necessary mitigating measures at both design and construction stages. These typically include selection of cable installation and protection techniques to preserve seabed and minimize sediment disturbance, soil restoration, translocation then restoration of spoil following the installation of the conduits, protection of archaeological material, Cable Crossing Agreements and consultation with windfarm developers, preservation of shipping and fisheries activities, limit installation activities



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during peak tourist season, selection of appropriate vessels and techniques techniques that limit noise propagation, and ramp up/soft start procedures for piling and geo acoustic survey techniques to prevent disturbance to receptors and others.

The Project has the potential to interact with several Natura 2000 sites (e.g. Blackwater River SAC – 002170 at 1.4km and River Barrow and River Nore SAC – 002162 at 6.5km). The Appropriate Assessment screening carried out by the Promoter concluded that likely significant effects cannot be excluded for the Ballymacoda Bay SPA and the Blackwater Estuary SPA. Further assessment within the Natura Impact Statement annexed to the Project application has led to the conclusion that the Project will not, either alone, or in-combination with other plans or projects, adversely affect the integrity of the identified sites in light of their conservation objectives, provided that the foreseen mitigation measures are implemented as planned. However; this has to be confirmed by the competent authority, which has still to public its Natura Impact Statement and/or Appropriate Assessment Determination.

Based on the review of the EIA report and other assessments prepared by the Promoter and the outcome of the public consultations, the Bank identified no significant environmental concerns. However, at this stage, formal feedback from the consenting authority has not been received yet for both the EIA and the Natura 2000 appropriate assessments. The above mentioned conclusions and mitigations will therefore have to be reassessed in the light of the feedbacks received.

### **Great Britain**

The offshore cables of the Project will cross the Great Britain EEZ for approximately 211 km.

A Marine Licence is therefore required under the Marine and Coastal Access Act 2009 (as amended in 2011). The licence application was submitted and validated as complete by the consenting authority - the Marine Management Organisation (MMO) - in July 2021. A draft licence has not yet been issued at the current time and is expected, according to the Promoter, in August 2022.

Statutory EIA was not required in respect of the application for the Marine licence (MMO statement EIA/2020/00042, 17 December 2020). Notwithstanding this, an Environmental Report was prepared by the Promoter to support the Marine licence application. Based on this report, with the implementation of appropriate mitigating measures, the Project is predicted to have no significant negative effect on the environment. The main mitigants resulting from the Environmental report prepared by the Promoter are in line with the ones for Ireland offshore.

Based on the screening carried out by Promoter, the project is likely to have significant effects alone and in-combination with other plans and projects on several UK nature conservation sites in respect of the potential disturbance and auditory damage of marine mammals caused by underwater noise creation and the potential for death or injury due to collision with vessels. The involved UK sites are: the Isles of Scilly complex SAC, Bristol Channel Approaches/Dynesfeydd Mor Hafren SAC, Pembrokeshire Marine/Sir Benfro Forol SAC, West Wales marine/Gorllewin Cymru Forol SAC, Cardigan Bay/Bae Ceredigion SAC, Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC, North Anglesey Marine/Gogledd Mon Forol SAC; and North Channel SAC. These sites have therefore been subject to further assessments with regards to the effects of underwater noise and vessel movements on marine mammals. Those further assessments have led to the conclusion that subject to the implementation of mitigating measures that are standard practice for marine development projects such as cable installations and offshore wind farms, the Project will not, either alone, or in-combination with other plans or projects, adversely affect the integrity of the identified sites in light of their conservation objectives. However, this has to be confirmed by the competent authority.

Based on the review of the Environmental report and other assessments prepared by the Promoter and the outcome of the public consultations, the Bank identified no significant environmental concerns. However, at this stage, formal feedback from the competent authority



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is still outstanding. The above mentioned conclusions and mitigations will therefore have to be reassessed in the light of the feedbacks received.

### **France**

The Project requires an Environmental Authorisation, which incorporates a full EIA process. The competent authority is the *Ministère de la Transition Écologique et Solidaire*. The authorization application was submitted in Q3 2021, with authorization not yet issued at current time and, according to the Promoter, expected in August 2022.

In addition, the Project requires a Public Utility Declaration (DUP). The competent authority is the Département du Finistère. The issuance of the DUP has not yet happened at current time and is expected, according to the Promoter, in August 2022. The impact assessment on Natura 2000 sites prepared by the Promoter has highlighted the following possible affected sites:

- ZSC Rivière Elorn (FR 5300024) ;
- ZSC Anse Goulven – Dunes de Keremma (FR5300016) ;
- ZPS Baie de Goulven (FR5312003) ;
- ZSC Abers – Côtes des Légendes (FR5300017) ;
- ZSC Guissény (FR5300043) ;
- ZSC Baie de Morlaix (FR5300015) ;
- ZPS Baie de Morlaix (FR5310073) ;
- ZSC Talus du Golfe de Gascogne (FR5302015) ;
- ZPS Talus du Golfe de Gascogne – Mers Celtiques (FR5212016).

The detailed assessments concluded that no adverse impact is expected on the species and habitats of those areas, in view of the sites' conservation objectives, according to the Promoter.

According to the environmental study carried out by the Promoter, the Project is not expected to have adverse impacts on the identified marine environments, also thanks to the application of standard mitigation measures typical of marine development projects, in particular insofar as noise pollution is concerned.

The Promoter has the capacity and is committed to implementing the necessary mitigating measures at both design, construction and operation stages. These typically include preliminary tracking the location of the submarine link, biosedimentary monitoring of the interconnection route in French territorial waters, monitoring of rock recolonization from marine species, monitoring of revegetation and others.

The assessment of the impacts on the onshore section also conclude that no significant adverse impact is expected, also by virtue of the selection of a route, techniques, and prevention measures that minimise potential impacts. The impacts will mostly be limited, of temporary nature, and reversible.

However, this has to be confirmed by the competent authority.

Based on the review of the Environmental report and other assessments prepared by the Promoter and the outcome of the public consultations, the Bank identified no significant environmental concerns. However, at this stage, formal feedback from the competent authority is still outstanding for both the Natura 2000 appropriate assessments and the EIA. The above mentioned conclusions and mitigations will therefore have to be reassessed in the light of the feedbacks received.

### **EIB Carbon Footprint Exercise**

The sources of CO<sub>2</sub> equivalent (CO<sub>2</sub> e) emissions for the Project are the ohmic losses in the converters and in the cables of the Project and the indirect emissions resulting from the losses



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in the rest of the network. These emissions are however offset by the indirect emissions savings resulting from the avoided curtailment of intermittent RES enabled by the Project.

Over the economic life of the Project the corresponding average absolute emissions are estimated at 15.8 kt CO<sub>2</sub> equivalent per year while the relative emissions savings are estimated at -665 ktCO<sub>2</sub> equivalent per year.

For the annual accounting purposes of the EIB Carbon Footprint, the Project emissions will be prorated according to the EIB lending amount signed in that year, as a proportion of Project cost.

### EIB Paris Alignment for Counterparties (PATH) Framework

As corporate entities, both Eirgrid and RTE are in scope of PATH assessment. According to the information available at the moment of writing this note, both TSOs are not operating in a high-emitting sector, being electricity transmission network operators and therefore are both screened out.

### Social Assessment, where applicable

The offshore part of the Project has the potential to interfere with fishing and shipping activities (commercial and recreational) or in general with marine/coastal and intertidal users and infrastructure (e.g. existing cable routes, coastal recreation). Standard mitigations are proposed to inform, sensitize, agree on schedule and in general promote an early engagement with owners / operators.

### Public Consultation and Stakeholder Engagement

Considering the different permitting procedures in the countries involved, separated consultations have been carried out.

In addition, the project being a PCI, as per requirement of the TEN-E regulation, in all jurisdictions public consultations were carried out prior to the submission of the permit application files in order to facilitate comments and objections by stakeholders/members of the public in advance of formal submission.

#### Ireland

EirGrid has been carrying out high level consultation and engagement with strategic stakeholders at a national level since inception and consultation and engagement with project stakeholders (including members of the public) from Step 2 since 2017.

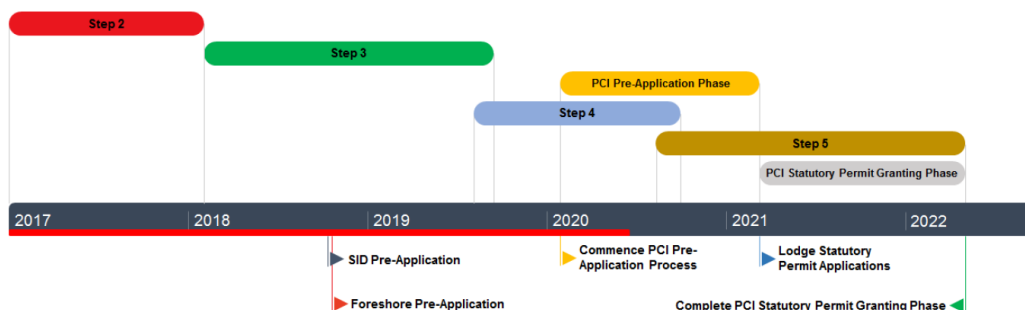


Figure 1 - Celtic Interconnector Project Consultation Timeline

(Source: Eirgrid, Volume 7A EIAR Celtic Interconnector TEN-E Regulation Concept for Public Participation)

Examples of proactive forms of stakeholder identification include:

- Stakeholder mapping workshops;
- Early stage communication and consultation activity;



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- Advertised engagement events e.g. project meetings, conferences etc.;
- Community Liaison Officer activity in local areas;
- Review of desktop information e.g. data from the Central Statistics Office (CSO) and the Property Registration Authority of Ireland (PRAI); and
- Engagement with statutory bodies.

Examples of passive forms of stakeholder identification include previously unidentified stakeholders interacting with the project in response to:

- Project website;
- Social media;
- Media reporting; and
- Word of mouth.

The most recent public consultations are:

- *A public consultation on the Foreshore Licence Appropriate Assessment - Commencement Date: Tuesday, 29 March 2022 - Closing Date: Wednesday, 27 April 2022 (available material in Cork County, Waterford County, Youghal Garda Station, Youghal Library)*
- *Statutory public consultation with regard to the Celtic Interconnector planning application process from 19 July 2021 to 6 September 2021*

### **Great Britain**

A public consultation was required in the frame of obtaining a marine licence to undertake the installation of that portion of the Celtic Interconnector within the UK Exclusive Economic Zone (EEZ), under the Marine and Coastal Access Act 2009, Part 4. It was held from 23 December 2021 to 11 February 2022.

### **France**

Public consultation from 29/11/2021 to 11/01/2022 organized by Département 29 - Finistère (interested municipalities: Bodilis, Cléder, Île de Batz, Goulven, Guisseny, Kerlouan, La Martyre, Landéda, Ploudiry, Plouescat, Plougar, Plouguerneau, Plouider, Plounéour-Brignogan-Plage, Plounévez-Lochrist, Plouzévédé, La Roche-Maurice, Saint-Servais, Saint-Vougay, Santec, Sibiril, Tréflaouéan, Tréfléz).

### **Other Environmental and Social Aspects**

The sponsors are committed to manage all the mitigation and monitoring measures identified through the EIA process and detailed in the Environmental Statements/Reports and other primary consent/permit application documents across all three jurisdictions. This will facilitate the delivery of the mitigation commitments so that environmental effects are appropriately managed and risk of unforeseen adverse effects arising during the implementation of the Project is kept to minimum.

## **Conclusions and Recommendations**

Based on the review of the EIA reports, the outcome of the public consultations, the other assessments prepared by the sponsors and the permits granted for the Project, the Bank identified no significant residual environmental and social impacts associated with the Project.

At this stage however, formal responses from competent authorities are still outstanding for the majority of the primary permits applications and the associated assessments under the EIA and Habitats Directives.

The Bank will complete its environmental and social due diligence based on the feedback and the formal response received in due course from the competent authorities. The award of all required primary permits and applications is a condition for signature.



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Based on the information available, the Project is expected to be acceptable to the Bank in environmental terms. Further appropriate conditions for signature and/or disbursement will be defined upon completion of the Bank's environmental and social due diligence for the Project.