

CONSULTATION

Response Document



43 Southgate Street, Winchester, Hampshire, SO23 9EH, UK
Tel: +44 (0)1962 868 626 | enquiries@cieem.net | www.cieem.net

EirGrid

**Grid Implementation Plan 2017-2022 [Draft]
for the Electricity Transmission System in Ireland**

30 July 2018

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), being the leading membership organisation supporting professional ecologists and environmental managers in Ireland and the United Kingdom, welcomes the opportunity to participate in this consultation process.

CIEEM was established in 1991 and has more than 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

Amongst others, CIEEM is a member of:

- National Biodiversity Forum (Ireland)
- Irish Forum on Natural Capital (working group member)
- The Environmental Science Association of Ireland
- Europarc Federation
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- The UK All Party Parliamentary Group on Biodiversity
- The UK Environmental Policy Forum

CIEEM has approximately 250 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on SEA and AA.

Comments from CIEEM

CIEEM welcomes the opportunity to participate in EirGrid's consultation on the Draft Grid Implementation Plan 2017-2022, SEA and NIS.

The review of the Plan, together with SEA and NIS reports, has been undertaken by members of the CIEEM Ireland Policy Working Group which comprises experienced, Irish-based, practitioners and specialists with a wide breadth of knowledge across the ecological and environmental management spectrum in Ireland.

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CIEEM would like to make a number considered comments on the consultation documents, as follows:

GENERAL COMMENTS

It is considered that these documents are generally thorough and robust, however we should like to draw your attention to a few specific items which, in our opinion, need to be addressed.

SPECIFIC COMMENTS

Draft Grid Implementation Plan 2017-2022 (April 2018)

- Table 4.1/Page 39: in Table 4.1 at EMM3 Preparation of Evidence-based Environmental Guidelines, cites "Ecology Guidelines for Electricity Transmission Projects - A Standard Approach to Ecological Impact Assessment of High Voltage Transmission Projects (October 2015)."

However, in Section 4.2 on page 42 the report states that "EirGrid is currently updating its existing Ecology Guidelines for Electricity Transmission Projects, published in 2011". Is this the same referenced document as that referred to on page 39? If so, the referenced year should be the same throughout.

- Page 40 / Section 4.2, paragraph 4 States "*This process of internal Screening for AA was subject to scrutiny by the High Court in a Judicial Review, and has been found to be robust.*"

It is suggested that the judgement(s) in question should be referenced.

- Page 43/ Section 4.4.2 & Page 87 / Table 13.1 ENVP4:
It is noted that the reference to the 2011 Regulations is in a broad context of 'protect flora, fauna and habitats' under ENVP4.

It is suggested that perhaps the biodiversity policies should more explicitly acknowledge EirGrid's role in not allowing invasive species listed on the Third Schedule of the 2011 European Communities (Birds and Natural Habitats) Regulations to disperse, spread or otherwise cause to grow in any place through EirGrid's activities (whether that be new, or maintenance of existing, infrastructure).

It is noted that invasive species are addressed in 'Table 13.3: From NIS- Box 7A. Key Principals for Protecting European Sites' on page 95, and perhaps this is sufficient, but if so it is considered that this table should be cross-referenced in Section 4.4.2 on page 43.

• *References:*

It is recommended that a separate references section should be provided for all cited sources (as in the SEA report). This would mean that only a short citation (author/date) to sources would be needed in the text instead of having the full reference citation embedded in the text.

SEA Environmental Report (April 2018)

• Page 42 Birds:

It is noted that the reference for Birds of Conservation Concern in Ireland (BoCCI List) is cited as 'BirdWatch Ireland, 2016'. The citation should be amended to: 'Colhoun & Cummins, 2013'.

Similarly, in the References section on page 188:

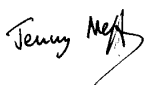
- The full citation should be: Colhoun K. & Cummins S. (2013). *Birds of Conservation Concern in Ireland 2014–2019*. Irish Birds **9**: 523-544.
- The link to this paper (BoCCI list) on the BirdWatch Ireland website does not appear to work. The correct web link is:
<https://www.birdwatchireland.ie/LinkClick.aspx?fileticket=EjODk32LNcU%3D&tabid=178>

All documents

In view of the reference citation issues highlighted above, it is suggested that references and cross - referencing should be checked across all three documents to ensure that they are correct and consistent, also that there is no disparity between text and full cited references.

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CIEEM members are knowledgeable about the natural heritage of Ireland and, as a professional body representing practicing ecologists (many of whose work is SEA/AA - related), CIEEM is therefore well placed to provide advice to the EirGrid in respect of ecological aspects of the EirGrid Draft-Grid-Implementation-Plan 2017-2022 going forwards and is willing to assist as appropriate, at any stage, including reviewing/commenting on further drafts if/when they become available.



Jenny Neff BSc(Hons) MSc(Ecol) CEcol CEnv FCIEEM

Chair, CIEEM Ireland Policy Working Group

Vice-President (Ireland) of the Chartered Institute of Ecology and Environmental Management (CIEEM)

30 July 2018