

EirGrid,
The Oval,
160 Shelbourne Road,
Dublin 4,
D04 FW28.

9th April 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to provide feedback on the development of EirGrid's Biodiversity Strategy. Biodiversity is a key component of Ireland's unique culture and heritage, contributing to Ireland's competitiveness in economic terms, helping to attract talent and investment.

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, and our purpose is to unite, represent and support our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Environment, Climate and Communications for 2024-25.

Cork Chamber's advocacy efforts are guided by the views and priorities of our members, and are shaped by our continuous engagement with members, our board and key stakeholders in Cork City and County. Both renewable energy and sustainability have been identified as key priority areas for progress in our engagement with members.

Cork Chamber welcomes EirGrid's commitment to protecting Ireland's biodiversity by refining its action in a formal strategy framework. Protecting and enhancing our natural environment is a key cornerstone of sustainability efforts across all sectors. In the context of major ongoing developments both onshore and offshore through the development of Ireland's grid, it is vital that all stakeholders involved coordinate their biodiversity preservation efforts. However, projects of strategic importance must not be delayed or abandoned because of costs or other difficulties associated with protecting biodiversity.

Yours sincerely,



Conor Healy

CEO

Q1. What do you think are the biggest challenges facing Ireland's biodiversity onshore?

Onshore biodiversity across Ireland, and indeed across the wider European Union, faces a number of challenges resulting from sustained degradation of ecosystems due to industrial development and other human actions. Protecting Ireland's rich and unique biodiversity is critical for preserving our environment and climate into the future and should be prioritised in all plans for major development, such as those undertaken by EirGrid.

In terms of onshore biodiversity, alignment with other operators in the energy space will be critical for EirGrid's strategy, particularly ESB, who have published a comprehensive biodiversity plan for the period 2024 to 2029.¹ Alignment with existing policies at both national and EU level, such as Ireland's National Biodiversity Action Plan and the EU's Biodiversity Strategy for 2030, should be prioritised, and EirGrid's strategy should work in support of the goals identified both in Ireland and at EU level.

Significant progress has been made on a number of projects of strategic importance being undertaken by EirGrid currently. In the Cork region, projects like the Celtic Interconnector and the Powering Up Offshore South Coast project will have a transformative impact on Ireland's energy system. While these projects are vital to bolster Ireland's grid infrastructure and ensure the provision of a future-proof, green energy-ready network, it is critical that all stakeholders remain mindful of the potential impact on Ireland's biodiversity that projects of this scale can have.

Of particular importance in terms of biodiversity is the location of many of EirGrid's large-scale infrastructure projects. Many key projects are located in more remote areas with unique ecosystems that can be particularly impacted by this large-scale development. Development in such areas can result in significant and sustained disruptions to habitats, which in turn can have a detrimental effect on a wide variety of species. It is critical that EirGrid takes account of the unique habitat profile of each area in which it operates and develops new projects, particularly any rare, sensitive or protected habitats, and collaborates with government, local communities and other relevant stakeholders to ensure that local biodiversity is preserved and enhanced as projects progress.

From a broader economic perspective, conserving local heritage and biodiversity plays a central role in defining the unique selling points of each region. This in turn helps to set our regions apart on the global playing field, defining our competitive edge and attracting both investment and talent. The connection between maintaining and creating vibrant, welcoming local communities and fostering economic growth and development is clear, and sustainable development that safeguards our biodiversity for future generations should be favoured insofar as possible in projects of all sizes.

¹ [Networks for Nature: ESB Networks Biodiversity Strategy 2024-2029](#)

Q2. What do you think are the biggest challenges facing Ireland's biodiversity offshore?

Water quality and the biodiversity of aquatic ecosystems and species is a particular concern in the context of Ireland's biodiversity offshore. Cork Chamber welcomes recent work by EirGrid and other stakeholders to prepare for the expansion of the offshore renewable energy sector, however it is vital that offshore biodiversity concerns are recognised and mitigated where possible in the context of this sector's development.

Cork Chamber established the Cork Offshore Renewable Industry Forum (CORIF) in 2024, bringing together representatives of the offshore renewables industry in Cork. The forum works to identify and advocate for key policy and infrastructure enablers that will ensure Cork and Ireland capitalise fully on the development of offshore renewables in the years to come.

CORIF has benefited from positive engagement with EirGrid in recent times, particularly in relation to key projects for the Cork region, such as the Powering Up Offshore South Coast project. Following approval of the first Designated Maritime Area Plan (DMAP) for the South Coast last year, there is a considerable amount of important work being undertaken by EirGrid and others in the Cork and Munster region to prepare for the realisation of the area's offshore wind potential.

In this context, it is critical to balance these necessary developments to facilitate the green energy transition, vital to help meet our climate targets and prepare for evolving and increasing energy demand, with the protection of biodiversity offshore. It is imperative to consider regional and local conditions, alongside the distinct characteristics of habitats and ecosystems, while prioritising engagement with local stakeholders within the framework of these projects.

Ireland's marine territory is vast, rich in biodiversity, and central to both our climate and economic future. As we work towards delivering on offshore wind targets and building a secure, sustainable energy grid, it is essential that we also safeguard the health of our marine ecosystems, from seabirds and marine mammals to deep-sea coral reefs. Scientific research, including work being undertaken by researchers at University College Cork, highlights clear and pressing challenges that must be considered in the planning and delivery of offshore infrastructure.

Offshore wind development, if not carefully sited and managed, may pose risks to marine wildlife. Seabirds are vulnerable to collisions with turbine blades and may be displaced from important feeding grounds, which impacts breeding success. Marine mammals are sensitive to underwater noise from construction activities and may avoid areas they previously relied on. While turbine structures may provide some artificial reef benefits, these do not outweigh the broader disturbance to established habitats.

Overfishing and bycatch continue to exert pressure on offshore ecosystems. Seabirds and marine mammals are affected by the depletion of forage fish and by accidental entanglement

in fishing gear. Bottom trawling, particularly in deep waters, can cause lasting damage to cold-water coral habitats which take centuries to recover. Climate change adds another layer of complexity, warming seas, shifting currents and increased storm activity are already altering species distribution, reducing food availability, and threatening nesting sites. Pollution, both visible and invisible, is reaching even our most remote waters. Microplastics have been found in deep-sea corals off Ireland's west coast, and noise pollution from vessels and industrial activity disrupts sensitive marine species.

It is vital that such potential negative consequences are taken into account before, during and after major development works.

Q3. Are there any particular aspects of biodiversity you think should be prioritised by EirGrid in their role as the onshore grid operator and offshore grid operator and owner?

In EirGrid's role as the onshore grid operator and offshore grid operator and owner, it is vital that EirGrid is mindful of the interrelation between onshore and offshore biodiversity and ensures that developments on- or offshore do not negatively impact the other environment and vice versa.

An integrated approach to biodiversity preservation in this regard will ensure a coordinated approach to biodiversity across all developments. Alignment with other biodiversity strategies and plans, such as that of ESB and government strategies, will be critical to achieve this.

While the protection of Ireland's unique biodiversity profile both onshore and offshore should be prioritised as much as possible, it is crucial that all stakeholders are mindful of the cost burden involved. Affordable and achievable biodiversity protections should be integrated into all major developments, however critical developments of strategic importance should not be delayed or abandoned entirely because of costs or other difficulties associated with protecting biodiversity.

Q4. Please share any insights on effective biodiversity action you have gained through involvement in any biodiversity projects in your locality

Cork Chamber has been designated an SDG Champion for 2024 – 2025 by the Department of the Environment, Climate and Communications. In addition, five SDGs have been identified by the Chambers Ireland network as priorities for progress. With this in mind, all of Cork Chamber's policy outputs and activities aim to work in support of these SDGs and in support of broader sustainability goals.

Cork Chamber coordinates the Sustainable Cork Programme, which aims to explore key themes vital to support a sustainable and resilient Cork, empowered by a thriving business community. As part of the Programme, an event on Infrastructure and Biodiversity was held in September 2024 to explore the impact of infrastructure developments on the natural environment and biodiversity. The event featured speakers from UCC, ESB, Bank of Ireland,

and the Land Development Agency, offering insights to businesses on how economic development and the natural environment can exist in equilibrium.

It is crucial that necessary infrastructure developments, such as those underway in the offshore renewables sector, are progressed in order to realise the societal and economic benefit they can bring about. However, it is vital that this is done in a manner that is mindful and respectful of the habitats in which it takes place, especially where activity is proposed near a Special Area of Conservation (SAC) or other ecologically sensitive site. A balance must often be struck between the protection of our natural environment and biodiversity and the achievement of our climate and economic goals in this regard.

Q5. Have you any other opinions/suggestions?

In addition to the feedback and recommendations outline above, EirGrid could examine the possibility of implementing a number of other measures to further promote biodiversity in the context of its operations, such as:

- Putting in place strong monitoring mechanisms at infrastructure sites to continuously monitor for ongoing or changing impacts on biodiversity.
- Expand EirGrid’s community engagement programmes, particularly in communities where large-scale infrastructure developments are taking place, to include programmes focused on biodiversity.
- Prioritise nature-based solutions as promoted by the European Commission where possible.²

² European Commission, [Nature-based Solutions](#)