FAO :Leeanne Doyle

Maritime Usage Licensing Team

Maritime Area Regulatory Authority

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4th June 2026

Dear Ms Doyle

Ref: LIC230014MA – Response to RFI issued by MARA on 14/05/2026

In response to your letter dated 14th May 2026 requesting further information, please find below the answers to your queries:

Query 1

With reference to the strict protection of species listed under Annex IV of the Habitats Directive (92/43/EEC), confirm if you are required to apply for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. If yes, provide details of the application submitted, including the NPWS Derogation Number or application reference number.*”*

<u>Response to Query 1</u>

SUMMARY POSITION

The position of Shannon Foynes Port Company is that we are **<u>not required</u>** to apply for a derogation under Regulation 54. We take this position because the law allows for, and indeed requires mitigation measures to be considered when assessing whether a derogation from the prohibitions in Article 12 of the Habitats Directive is required. An explanation of this position is set out below in detail.

EXPLANATION AND REASONING

LIC230014MA seeks to amend LIC230014, granted in October 2024, by undertaking additional Marine Site Investigation works (geophysical and geotechnical marine-based site investigations and grab samples) in two extra areas to those already licenced and already completed under LIC230014, resulting in an increase in the footprint of the licensed works.

LIC230014 states in its recitals at (D) that "The Grantor, under Section 112 of the Act, is the competent authority for the purposes of Part 5 of the Act for the purposes of Part 5 of the European Communities (Birds and Natural Habitats) Regulations, 2011. The Grantor has carried out screening for appropriate assessment in respect of the Permitted Maritime Usage and has determined that appropriate assessment was required as it cannot be excluded on the basis of objective scientific information that the proposed activities, individually or in combination with other plans or projects, will have a significant effect on European sites".

LIC230014 further states in its recitals at (E) that "The Grantor has completed an Appropriate Assessment in respect of the Permitted Maritime Usage and has determined, that the activities (either individually or in combination with any other plans or projects) will not adversely affect the integrity of any European Sites, in view of the sites' conservation objectives, subject to the implementation of the mitigation measures adopted and outlined in the Appropriate Assessment".

Set out in these terms, it has been determined that undertaking the activities licenced under LIC230014 will not adversely affect the integrity of a European Site, subject to the implementation of mitigation measures. For the avoidance of doubt, those mitigation measures are captured as 'Specific Condition' of LIC230014, and they are listed at Appendix 2 of the licence. Mitigation measures relevant to species listed under Annex IV of the Habitats Directive are described in Condition No's. 29, 30 and 34 at Appendix 2 –

"*29. Marine Mammals*

i. *The Holder shall appoint a marine mammal observer for the purposes of overseeing the activity. The Holder shall ensure the marine mammal observer shall satisfy the requirements of National Parks and Wildlife Service guidance.*
ii. *The Holder shall implement risk control and mitigation measures for marine mammals in strict accordance with National Parks and Wildlife guidance.*
iii. *The Holder, upon completion of the Permitted Maritime Activity, shall forward all reporting to offshore@npws.gov.ie and compliance@mara.gov.ie.*

30. In-combination effects

i. *Prior to the commencement of the Permitted Maritime Usage, the Holder shall coordinate with other authorisation holders carrying out geophysical, seismic and geotechnical activities within a 10 km radius of the site boundary.*
ii. *Where a vessel to vessel distance of greater than 10 km cannot be maintained with respect to geophysical, seismic and geotechnical activities, the Holder shall co-ordinate with other authorisation holders to prevent temporal overlap of the activities. Where the Holder can submit evidence that there is a vessel to vessel distance of greater than 10 km, no temporal co-ordination of activities is required.*
iii. *Where the Holder becomes aware of temporal overlap that cannot be resolved within the prescribed distance, the Holder shall notify the Grantor who shall determine the timing of activities.*

iv. *Records of al engagements held and agreements reached, if any, shall be maintained by the Holder and made available to the Grantor if requested.*

34. Accidental events
The Holder shall ensure that there is an oil pollution emergency plan on-board any survey vessels. This plan should specify:

i. *Information on the location and detail of spill response resources on-board;*
ii. *Information on crew training in relation to oil pollution response;*
iii. *How crew will interface with other site investigation operators, where applicable*."

These licence conditions of LIC230014 reflect the mitigation measures specified in Table 4-5 of the Natura Impact Statement (NIS) prescribed to prevent adverse effects on the integrity of the Lower River Shannon SAC in relation to the conservation objectives of Annex II species which are qualifying interests of that Natura 2000 site, and also the mitigation measures prescribed at Section 6.1 of the Annex IV Species Risk Assessment report in relation to marine mammals.

The Appropriate Assessment conducted by MARA prior to the grant of licence LIC230014 concludes that undertaking the activities will not adversely affect the integrity of a European Site, subject to the implementation of mitigation measures. The NIS concludes that with the implementation of mitigation measures, the activities will not adversely affect the integrity of any European Sites. The Annex IV Species Risk Assessment report concludes that with the implementation of mitigation measures, there will be no residual impacts from the proposed marine operations on Annex IV species in the area.

This is an important point to make, establishing that it is only when taking into consideration the mitigation measures adopted, that the conclusion can be reached that there will be no adverse effect or residual impact on the species concerned.

The same mitigation measures and protocols are proposed as part of activities proposed to be undertaken under LIC230014MA (comprising geophysical and geotechnical marine-based site investigations and grab samples in two additional areas). These measures are specified in Table 4-5 of the NIS, and at Section 6.1 of the Annex IV Species Risk Assessment report submitted in support of MUL application LIC230014MA.

In July 2025, the NPWS released updated guidance in light of the decision of the Court of Justice of the European Union (CJEU) in *Hellfire Massey Residents Association v. An Bord Pleanála* C-166/22 on the relationship between the systems of development consent and the provision of derogations regarding the strict protection of species under Annex IV to the Habitats Directive. That guidance states that, where a derogation licence is required for any activity, that derogation must be granted by the Minister before consent issues for the proposed activity.

Regulation 51(2)(b) of S.I. No. 477/2011, as amended, states that a person shall be guilty of an offence under the EC (Birds and Natural Habitats) Regulations if, inter alia, they deliberately disturb a species referred to in Part 1 of the First Schedule to the Regulations, particularly during the period of breeding, rearing, hibernation and migration. That is so notwithstanding any other consent, including planning permissions, except in accordance with a licence granted by the Minister (under Regulation 54). Such species include dolphins, whales, porpoises, seals, otters and bats.

As LIC230014 was granted prior to the publication of updated guidance from NPWS, and LIC230014MA is yet to be determined but must be determined in light of the updated guidance from NPWS on provision of derogations regarding the strict protection of species under Annex IV to the Habitats Directive, MARA has asked the applicant to confirm if they are required to apply for a derogation under Regulation 54 of S.I. No. 477/2011, as amended.

The position of Shannon Foynes Port Company is that we are **not required** to apply for a derogation under Regulation 54. We take this position because the law allows for, and indeed requires mitigation measures to be considered when assessing whether a derogation from the prohibitions in Article 12 of the Habitats Directive is required.

Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, provides as follows:

> *51. (1) The Minister shall take the requisite measures to establish a system of strict protection for the fauna consisting of the species referred to in Part 1 of the First Schedule.*
>
> *(2) Notwithstanding any consent, statutory or otherwise, given to a person by a public authority or held by a person, except in accordance with a licence granted by the Minister under Regulation 54, a person who in respect of the species referred to in Part 1 of the First Schedule—*
>
> *(a) deliberately captures or kills any specimen of these species in the wild,*
>
> *(b) deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration,*
>
> *(c) deliberately takes or destroys eggs of those species from the wild,*
>
> *(d) damages or destroys a breeding site or resting place of such an animal, or*
>
> *(e) keeps, transports, sells, exchanges, offers for sale or offers for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive,*
>
> *shall be guilty of an offence."*

Regulation 54 establishes a system of "derogation licences", pursuant to which, activities which would otherwise constitute an offence under Regulation 51 might be permitted by the Minister:

(1) Any person may apply to the Minister, or the Minister or Ministers of Government with responsibilities for fish species referred to in Part 2 of the First Schedule, for a derogation licence from complying with the requirements of the provisions of Regulations 51, 52 and 53.

(2) Where there is no satisfactory alternative and the derogation is not detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range, the Minister, or the Minister or Ministers of Government with responsibilities for fish species referred to in the Fourth Schedule, may grant such a derogation licence to one or more persons, where it is:

(a) in the interests of protecting wild fauna and flora and conserving natural habitats,

(b) to prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property,

(c) in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment,

(d) for the purpose of research and education, of repopulating and re-introducing these species and for the breeding operations necessary for these purposes, including the artificial propagation of plants, or

(e) to allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule.

The question arises as to whether an activity which, with effective implementation of mitigation measures, will not cause any significant impact on marine mammals may simultaneously require a derogation licence. In other words, when assessing the requirement for a derogation licence under Regulation 54, should mitigation measures to be taken into account?

This issue is relevant to MARA's jurisdiction to consider and/or determine the MUL application in the absence of a derogation licence. The necessity to obtain a derogation licence <u>prior</u> to obtaining consent for a project was the subject-matter of the judgment of the Court of Justice of the European Union [CJEU] in *Hellfire Massy* referred to above. The Court held in the following terms regarding the prescribed sequencing for permissions and derogations:

"The applicant in the main proceedings submits, in essence, that the system of strict protection provided for in Article 12 of Directive 92/43, as implemented in Irish law, is invalid in so far as it does not integrate the derogation mechanism laid down in Article 16 of that directive into the procedure for granting development consent to projects and,

moreover, does not provide for proper public participation, thereby failing to comply with the Aarhus Convention.

The Board and the Irish authorities dispute the merits of the abovementioned ground of challenge. In addition, they object to the reliance by the applicant in the main proceedings, first, on the Aarhus Convention since it did not expressly reference that convention in its pleadings, and, second, on possible future harm to strictly protected species…

By its third and fourth questions, which it is appropriate to examine before the first and second questions, the referring court asks, in essence, whether Articles 12 and 16 of Directive 92/43 are to be interpreted as requiring a piece of national legislation intended to transpose those provisions of Directive 92/43 into national law to provide for (i) a development consent procedure which involves a decision by a competent authority determining whether it is necessary to apply for a derogation under Article 16 of that directive because of matters identified following the grant of development consent to a project and/or whether surveys are required to that end and (ii) public participation in that derogation procedure.

In that regard, it is sufficient to note that Articles 12 and 16 of Directive 92/43, which do not concern only activities carried out in the context of projects within the meaning of Article 1(2)(a) of Directive 2011/92, but which concern any human activity, do not require the derogation procedure under Article 16 of Directive 92/43 to be integrated into the procedures for granting development consent to such projects; nor do they require provision to be made for public participation in such a derogation procedure…

Articles 12 and 16 of Directive 92/43 and, accordingly, Regulations 51 and 54 of the 2011 Regulations which transpose those provisions into national law, must be interpreted and applied in conformity with the requirements arising from other EU acts and from international conventions which are binding on the European Union, in particular, the requirements arising from Directive 2011/92 and from the Aarhus Convention, as interpreted in the case-law of the Court.

It follows from that case-law that, in the specific case where, first, the execution of a project that is subject to the dual requirement for assessment and development consent laid down in Article 2(1) of Directive 2011/92 involves the developer applying for and obtaining a derogation from the plant and animal species protection measures prescribed in the provisions of national law transposing Articles 12 and 13 of Directive 92/43 and where, second, a Member State confers power to grant such a derogation on an authority other than the one on which it confers power to give development consent for the project, that <u>potential derogation must necessarily be adopted before development consent is given</u>. If it were otherwise, that development consent would be given on an incomplete basis and would not, therefore, meet the applicable requirements."

[Emphasis added]

The CJEU's decision in *Hellfire Massey* underscores from the *corpus* of case law that emphasises the restrictive and narrow application of the derogation principle in European Union law. The jurisprudence in that regard is instructive in considering the substantive issue arising as to whether that principle allows for (or requires) mitigation measures to be included in the assessment of whether a grant of derogation is necessary. In *Namur-Est v. Régione wallone* C-463/20 the CJEU noted:

> *"By its first question, the referring court asks, in essence, whether Directive 2011/92 must be interpreted as meaning that a decision adopted under Article 16(1) of Directive 92/43 and which authorises a developer to derogate from the applicable species protection measures in order to carry out a project within the meaning of Article 1(2)(a) of Directive 2011/92 forms part of the development consent procedure, within the meaning of Article 1(2)(c) of that directive, where, first, the project cannot be carried out without the developer having first obtained that decision and, second, the authority competent for granting development consent for such a project retains the ability to assess the project's environmental impact more strictly than was done in that decision…*
>
> *As regards, in the second place, the context in which the definitions given in points (a) and (c) of Article 1(2) of the directive occur, it must be observed, first of all, that, as is apparent from the directive as a whole, the development consent decision is meant to be taken upon the conclusion of the entire process for the assessment of projects likely to have significant effects on the environment, which are referred to in Article 2(1) of the same directive.*
>
> *Those provisions thus make it clear that the grant of development consent for a project is the end point of a decision-making process which begins with the developer submitting an application and which, from a procedural perspective, includes each and every step that is required in order to process that application.*
>
> *Next, those provisions show that, from a substantive rather than procedural perspective, that decision-making process must lead the competent authority to take full account of the effects that projects subject to the dual requirement for assessment and development consent laid down in Article 2(1) of Directive 2011/92 are likely to have on the environment, as the Advocate General observed in point 44 of her Opinion.*
>
> *It follows that <u>the decision-making process instituted by Directive 2011/92 must address, in particular, the significant effects that a project subject to the Directive is likely to have on the fauna and flora present in the various areas that may be affected by the project</u>, such as the construction zone and the areas adjacent to it, as indeed has already been made clear in the Court's case-law…*"
>
> [Emphasis added]

Whilst the purpose of the law, as interpreted by the CJEU, is clearly designed to ensure that fauna and flora are adequately protected, the assessment regarding whether ecological features will be affected is predicated upon "*the significant effects that a project subject to the directive is likely to have*", rather than a hypothetical assessment of the likely significant impacts of a project in the absence of mitigation measures.

In the closely related area of the conservation of wild birds and the identical prohibition in Article 5(d) of Directive 2009/147/EC, the CJEU has recently (26 February 2026) addressed the issue as to whether mitigation effects are to be taken into account when assessing derogation in C-131/24 *VIRUS v. Land Niederösterreich*. In *VIRUS*, the CJEU emphatically reiterated that mitigation measures were to be considered for the reason outlined in *Namur-Est*, namely, that any derogation must address the actually likely effects of a project. The European Court specifically addressed the question of derogating from the overlapping protections in both the Habitats Directive and the Birds Directive:

> *"The referring court asks, in the first place, whether measures intended to prevent or limit disturbances to the bird species concerned by the project at issue may be taken into account in order to assess whether that project satisfies the requirements of Article 5(d) of the Birds Directive. It considers that the Court's case-law prohibiting the taking into account of measures aimed at avoiding or reducing adverse effects on the protected site at the stage of the screening preceding the appropriate assessment provided for in Article 6(3) of the Habitats Directive cannot be transposed to Article 5(d) of the Birds Directive.*
>
> *The referring court considers it necessary, on the contrary, to align the interpretation of Article 5(d) of the Birds Directive with that of Article 12(1)(d) of the Habitats Directive, as formulated by the Commission in its Guidance document on the strict protection of animal species of Community interest under the latter directive [C(2021) 7301 final]. The essential criterion resulting from that interpretation is that the permanent ecological function of the site be maintained or improved…*
>
> *By its first question, the referring court asks, in essence, whether Article 5(d) of the Birds Directive must be interpreted as meaning that there is no deliberate disturbance, within the meaning of that provision, where measures, implemented as part of a project, make it possible to prevent any significant effect having regard to the objectives of that directive…*
>
> *First, regarding the wording of Article 5(d) of the Birds Directive, it should be noted that, unlike the prohibitions laid down in Article 5(a) and (b) of that directive, the prohibition set out therein, namely the prohibition of deliberate disturbance of birds, particularly during the period of breeding and rearing, applies 'in so far as disturbance would be significant having regard to the objectives of [that directive' (judgment of 1 August 2025, Voore Mets and Lemeks Põlva, C-784/23, EU:C:2025:609, paragraph 50). Consequently, unlike what is required for the application of Article 5(a) and (b) of the same directive, the examination of the effect of a human activity on the population level*

of the bird species concerned is relevant for the purposes of applying the prohibition laid down in Article 5(d) of the Birds Directive (see, to that effect, judgment of 1 August 2025, Voore Mets and Lemeks Põlva, C-784/23, EU:C:2025:609, paragraph 54).

It follows that, if appropriate preventive measures effectively prevent a project from disturbing wild birds or are effectively capable of reducing that disturbance such that it does not have significant effects on the objectives of the Birds Directive, it follows from the wording of Article 5(d) thereof and from the context of that provision that the prohibition of deliberate disturbance referred to in that provision is not applicable. <u>The existence of such measures, the implementation of which is provided for by the project, must therefore be taken into consideration in assessing whether the prohibition on disturbance of wild birds laid down in Article 5(d) of the Birds Directive precludes the project.</u>

Second, it is not necessary, in order to attain the objectives of the Birds Directive, recalled in paragraph 40 of the present judgment, namely the maintenance or restoration to a sufficient level of the population of wild bird species, that the disturbing effects of a project on wild bird species be assessed independently of the accompanying measures proposed for the project to prevent or reduce those effects. After all, the disturbances which will actually be suffered by the wild bird species as a result of the implementation of the project, as accompanied by those measures, are alone relevant in the light of those objectives.

[…]

It follows from the foregoing that Article 5(d) of the Birds Directive must be interpreted as meaning that <u>there is no deliberate disturbance, within the meaning of that provision, where measures, implemented as part of a project, make it possible to prevent any significant effec</u>t contrary to that directive's objectives of maintaining or restoring to a sufficient level the population of all species of naturally occurring birds in the wild state in the European territory of the Member States, taking into account, in particular, ecological, scientific and cultural requirements, as well as economic and recreational requirements."

[Emphasis added]

The CJEU judgment is clear that mitigation measures <u>must</u> be taken into account when assessing the necessity of derogation and, secondly, that "*deliberate disturbance*" for the purposes of the Birds Directive is expressly equated with "*significant effects contrary to that directive's obligations*". This latter point is consistent with the consideration of those concepts in the *Namur-Est* decision regarding the Habitats Directive and is of substantive importance in circumstances where both the Annex IV Risk Assessment report and NIS submitted in respect of MUL application LIC230014MA are unequivocal as to the fact that no significant effects on marine mammals will arise from the mitigated activities.

Similarly, in *Föreningen Skydda Skogen v. v Länsstyrelsen i Västra Götalands län (*Case C-473/19), the Advocate General opined that the test for whether the prohibition in Article 12 of the Habitats Directive applied should be directly related to whether the activity will be "*particularly likely*" to be detrimental to the conservation status of the relevant species:

> *"However, aligning the prohibition on disturbance with the objective of the Habitats Directive does not only restrict its application with regard to isolated and ultimately insignificant disturbances of individual specimens. In turn, it also suggests that the prohibition on disturbance protects important habitats of the species irrespective of whether individual specimens are present, breeding and resting places are there or protected areas have been established there. The reason for this is that, particularly in the light of the objectives of the directive, causing detriment to or eliminating the habitat may cause significant disturbance to the relevant species irrespective of these factors.*
>
> *Consequently, the prohibition on disturbance under Article 12(1)(b) of the Habitats Directive must be restricted to acts that are particularly likely to be detrimental to the conservation status of the protected species, in particular in places of particular importance to those species or where they would be adversely affected in terms of their breeding, rearing, hibernation and migration.*"

The CJEU delivered its judgment largely agreeing with the Advocate General's Opinion and holding that:

> *"Having regard to all of the foregoing considerations, the answer to the second question is that Article 12(1)(a) to (c) of the Habitats Directive must be interpreted as meaning that… <u>the prohibitions laid down in that provision apply only in the event of a risk of adverse effects on the conservation status of the species concerned</u> and, secondly, the protection afforded by that provision does not cease to apply to species which have attained a favourable conservation status."*
>
> [Emphasis added]

The principle that mitigation measures should be taken into account when assessing the need for derogation was already reflected by the National Parks and Wildlife Service in its Guidance on Article 12 of the Habitats Directive (*Strict Protection of Animal Species*) where the following is stated at p.22:

> *"If mitigation is capable of reducing those impacts to the point where there will be no harmful effect, then a derogation will not be necessary."*

The fact that the sequencing stipulated in the CJEU judgment in *Hellfire Massy* only "bites" where a derogation licence is actually required on the facts was squarely acknowledged by

Humphreys J. in his directly subsequent judgment in the High Court in *Hellfire Massy Residents Association v. An Bord Pleanála (No.5)* [2023] IEHC 591:

> *"The proposition is that if a derogation licence is necessary, it should be obtained in advance. But while that may be important in another case, it doesn't arise here because a derogation licence isn't necessary as matters stand."*

CONCLUSION

The substantive issue considered by the CJEU in *VIRUS* was whether Article 5(d) of the Birds Directive – and, by implication, Article 12(1)(d) of the Habitats Directive – must be interpreted as meaning that there is no deliberate disturbance, for the purposes of those provisions, where measures, implemented as part of a project, make it possible to prevent any significant effects.

The resolution of this substantive issue by the CJEU is that, if appropriate preventive measures effectively prevent or reduce disturbance, then such that a project does not have significant effects on the objectives of the Birds and Habitats Directives, and the prohibition of deliberate disturbance is not applicable.

Accordingly, the existence of mitigation measures, the implementation of which is anticipated to be a condition of the license granted for LIC230014MA in the same way as those mitigation measures were captured as 'Specific Condition' of LIC230014, must be taken into consideration by MARA in determining the licenced in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.

EU law <u>requires</u> that the mitigation measures proposed to be implemented in respect of the proposed marine site investigations form part of the assessment as to whether derogation from the prohibition on deliberate disturbance at Article 12 of the Habitats Directive and Regulation 51(2) of the EC (Birds and Natural Habitats) Regulations 2011 is required.

Accordingly, in considering the issue as to whether or not a derogation licence is required, MARA is <u>obliged</u> to consider the materials submitted in the Annex IV Species Risk Assessment report and NIS to the effect that the proposed activities will have no significant impacts on marine mammals if mitigation measures are implemented.

In circumstances where appropriate mitigation measures will effectively prevent or reduce disturbance, such that the proposed marine site investigations will not have significant effects on the objectives of the Habitats Directive, then the prohibition of deliberate disturbance is not applicable and a derogation licence is not required.

Query 2

The proposed MUL area as submitted does not align to the High Water Mark as defined by the Chief Boundary Surveyor, and traverses onto terrestrial land. Confirm if the proposed MUL Area should align exactly with the High Water Mark by the Chief Boundary Surveyor (available for download as High Water Mark - National Water Marks - Ungeneralised – 2026 from https://arcg.is/1zSran1). Please resubmit any amendments to the GIS data and proposed MUL map to MARA in accordance with the MARA Technical Mapping Guidance Notes. Please note that MARA has made available a GIS Data Delivery Shapefile Template Pack for Applications which may be of assistance

Response to Query 2

The MUL area has now being aligned with the High Water Mark as defined by the Chief Boundary Surveyor. A package of 5 drawings is enclosed with this letter and these drawings supersede any previous drawings provided as part of the MUL amendment application. A file containing shapefiles for the revised MUL area is also enclosed.

Query 3

The AIMU (pg. 28) states that subtidal sampling will include a *"Single vibrocore collected in **Area A** to a depth of 2m…".* Confirm that this should be Area C.

Response to Query 3

We can confirm that the Single vibrocore will be collected in Area C to a depth of 2m and diameter of approximately 75mm as shown in Figure 2.5 of the AIMU

Query 4

Confirm the correct borehole diameter to be used for the geotechnical surveys proposed under the current material amendment.

<u>Response to Query 4</u>

Borehole diameters will typically be 200mm diameter, however this will be dependent on the Contractor and could go up to a maximum of 250mm diameter.

Yours Sincerely

John Carlton

Port Services Manager

Shannon Foynes port Company

Enc: 5 pdf files of amended drawings

GIS package containing shapefiles of amended MUL outline