

Attachment 4.10

Consistency of the proposed Maritime Usage with the 4th National Biodiversity Action Plan 2023 – 2030

The Fourth National Biodiversity Action Plan (NBAP) 2023–2030 sets out Ireland’s strategic framework for halting and reversing biodiversity loss, while ensuring that the sustainable use of natural resources underpins social and economic well-being. The Plan is structured around five overarching objectives:

- Conserve and restore biodiversity
- Improve the evidence base for biodiversity action
- Enhance Ireland’s contribution to global biodiversity
- Mainstream biodiversity into decision-making
- Secure nature’s contribution to people.

Any marine activity proposed within Irish waters, including the site investigation surveys outlined below, must be considered in the context of these objectives and demonstrate consistency with them. The proposed Maritime Usage in Liscannor Bay is a temporary, local scale activity aimed at informing the design and location of a treated effluent outfall pipe which will reduce potential impacts on the environment, human health, and sensitive communities and habitats. The development of the new outfall aims to address existing pressures on receiving waters, including eutrophication and public health risks. The project therefore is well-aligned with the NBAP through evidence-based decision-making, and by contributing to the long-term conservation and restoration of biodiversity and the securing of nature’s contribution to people. The consistency of the proposed Maritime Usage with the five main objectives of the NBAP are outlined below:

Mainstream biodiversity into decision-making

In line with the NBAP objective to mainstream biodiversity across all sectors and decision-making, the proposed site investigation surveys have been planned with consideration of ecological sensitivities of protected/sensitive habitats/species within and adjacent to the proposed site area, including the Inagh River Estuary Special Area of Conservation which overlaps the survey footprint. The project has been subject to Appropriate Assessment (AA) screening in compliance with Article 6 of the Habitats Directive, ensuring that potential interactions and subsequent effects on qualifying habitats and species have been assessed (see Attachment 4.3). Where risks were identified, avoidance and mitigation measures have been incorporated into the survey design and method statements. This approach ensures that biodiversity considerations are integrated into every stage of project planning, in full consistency with the NBAP objective to embed biodiversity protection into public decision-making. Furthermore, failure to address the existing discharge non-compliance from the current WWTPs would continue to pose a risk to both human health and biodiversity

in Liscannor Bay. Addressing this issue through informed, sustainable design therefore directly supports the mainstreaming of biodiversity protection into infrastructure and water management decisions.

Improve the evidence base for biodiversity action

The NBAP highlights the need to strengthen Ireland's biodiversity knowledge base and improve the evidence underpinning policy and planning. The proposed site investigation surveys directly support this objective by generating high-quality baseline data on bathymetry, seabed geology, sediment characteristics, water quality, marine habitats, benthic communities, and potential archaeological features. These data will inform the optimal outfall design and location, ensuring that the final infrastructure is situated and constructed in a manner that minimises ecological disturbance (*i.e.*, the dispersion and dilution of appropriately treated effluent). Beyond project design, these investigations will also contribute to the wider evidence base on the biological, physical, and cultural characteristics of Liscannor Bay, consistent with NBAP actions to improve data-sharing, monitoring, and the scientific foundation for biodiversity management. The project reflects the NBAP's call for evidence-based decision-making and cross-sectoral data integration, ensuring that biodiversity considerations are informed by robust and transparent data.

Conserve and restore biodiversity

In support of the NBAP objective to conserve and restore biodiversity, the proposed site investigation surveys are not expected to result in permanent or long-term habitat loss or degradation. Indicative sample numbers/spatial extent and locations are provided in the project description and duration sections of the MUL application form (Attachments 3.1 and 3.3). Sediment disturbance will be localised and temporary, with no long term impacts on seabed morphology or benthic habitat. Use of a drop-down video (DDV) survey will ensure that sampling avoids reef or biogenic habitats and other sensitive benthic features. Intertidal trial pits and sampling will be reinstated immediately following sampling completion, and geophysical surveys will be conducted within a short operational window to limit acoustic disturbance.

Collectively, these measures ensure that the site investigation surveys are fully consistent with the NBAP's conservation objectives — avoiding degradation of marine habitats, minimising disturbance to species, and supporting restoration through improved water quality in the longer term.

Secure nature's contribution to people

This objective focuses on protecting and enhancing the ecosystem services and natural benefits that biodiversity provides to people. The proposed project supports this goal by addressing ongoing risks to public health, recreation, and tourism arising from existing wastewater non-compliance discharging into the Inagh River which ultimately discharges into Liscannor Bay, signifying a risk to human health and the environment.

By informing the design of a compliant wastewater outfall, the site investigation surveys contribute to safeguarding bathing water quality, protecting recreational opportunities such as surfing and swimming, and maintaining the natural and cultural values of the coastline — all key components of nature’s contribution to people. These improvements will enhance the sustainability and attractiveness of the local area, aligning directly with NBAP priorities to sustain human well-being through a healthy natural environment.

Enhance Ireland’s contribution to global biodiversity

Although the site investigation surveys are local in scale, they demonstrate Ireland’s commitment to international biodiversity goals under the EU Biodiversity Strategy for 2030 and the Convention on Biological Diversity (CBD), both of which underpin the NBAP.

By informing a project that will improve wastewater management and water quality, the site investigation surveys contribute indirectly to Ireland’s obligations under the EU Water Framework Directive and Marine Strategy Framework Directive, which aim to achieve good ecological status of all water bodies and protect marine and freshwater biodiversity. These outcomes reflect Ireland’s broader international commitments to halt biodiversity loss, restore degraded ecosystems, and reduce pollution pressures — core global targets also embedded within the NBAP. The proposed approach shows how even small-scale marine activities can exemplify the integration of biodiversity considerations into development, reinforcing Ireland’s contribution to global biodiversity objectives.

In conclusion, the proposed site investigation surveys and associated environmental assessments will inform infrastructure that ultimately enhances local water quality, protects ecosystem services, and reduces existing pressures on marine habitats. As such, the proposed Maritime Usage is consistent with the Fourth National Biodiversity Action Plan 2023–2030.