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FAO Foreshore Unit Newtown Road, Carricklawn, Wexford, Y35 AP90

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta Department of Housing, Local Government and Heritage

28th February 2022

Re: FS006916 EirGrid Celtic Interconnector Electricity Cable

Foreshore Reference: FS006916

Please see below our responses to the both the 2 public submissions received Dec 23rd 2021 (Number 1 & 2) and observations/recommendations received from the Prescribed Bodies Consultation received on Jan 26th 2022 (Number 3 to 21)

The original public submissions are included in Appendix 1.

The observations/recommendations received from the Prescribed Bodies are included in Appendix 2.

Yours sincerely,

Project Manager, Celtic Interconnector Project, EirGrid PLC



1. Public Submission 1

Response to Public Submission 1:

We recognise the importance of open and timely engagement with the fishing community and stakeholders whose activities have the potential to be affected by the proposed development. Eirgrid are committed to the appointment of a Fisheries Liaison Officer (FLO) during the proposed development, who will maintain communication with fisheries representatives and organisations throughout construction and installation in accordance with good practice (FLOWW, 2014) (S. 19.11 - Mitigation).

Importance of the area to Inshore Fishing Activity

We recognise the importance of Youghal Bay to the inshore local fishing fleet that employs a diverse array of gear to harvest both shell- and fin-fish, including hand gathering of periwinkles. Our assessment of the fishery was in part drawn from data derived from the Central Statistics Office (An Phriomg-Oifig Staidrihm) (2019).

By its very nature, the installation of the Proposed Development will cause disturbance to the seabed in the immediate vicinity however this disturbance will be temporary, mobile and localised, representing only a small footprint within the wider bay. Crustaceans are mobile species and relatively tolerant of temporary disturbance with high and rapid recoverability. The FLO will maintain communication with mariners during this period of recovery.

Inshore the course of the cable lies predominantly through soft sandy substrate where the target depth of cable lay is 1.8m below stable seabed. The proposed development has the potential to temporarily effect the shrimp fishery along the immediate course of the cable route.

The first phase of the cable installation sequence is anticipated to take between approximately six to ten weeks and will be focused outside the peak summer months, i.e. October to April and undertaken predominantly on the foreshore and intertidal zone extending only a short distance into the subtidal zone. Whilst these works will be carried out during the shrimp fishing season the location of the works and any associated exclusion zone should not significantly impact the shrimp fishing grounds as the works take place primarily on land with land based equipment.

The second phase of the cable installation sequence that would occur in subtidal waters is must take place in an appropriate window during the summer months, i.e. May to September, to coincide with favourable weather & tidal windows for nearshore cable installation. Although this time does overlap with the start of the Shrimp season (1st August), the window required is short (days) and Eirgrid will endeavour to carry out the works predominately outside of the shrimp fishing season but optimum tidal conditions may require that these works take place in a short window during August to September. The area affected will be temporary, mobile and localised The Fisheries Liaison Officer (FLO) will ensure timely engagement with the fishing community whose activities have the potential to be affected by the proposed development throughout construction and installation.



Advanced warning and accurate location details of construction operation and associated mobile safety zones. Safety zones to be brought to the attention of mariners with as much advance warning as possible via frequent notice to Mariners and other means e.g. the Kingfisher Bulletin, VHF radio broadcasts etc. and through direct communications via the FLO.

Likely short term disruption of activity and economic impact caused by the same.

The request for a Fisheries Management and Mitigation Strategy (FMMS) is noted; we would propose that this forms part of the conditions attached to the Foreshore Licence, the contents of which to be discussed and agreed with relevant stakeholders prior to commencement of works.

Medium to long term economic impact.

Submission 1 raises concerns regarding EMF effects and attaches a research article.

We draw attention to Section 8.1 of Volume 3D2 of the offshore EIAR where the static magnetic field strength at maximum circuit loading is given for the Celtic Interconnector as 15uT (micro tesla). We reference Chapter 4 of Volume 3C Part 2 EIAR for Ireland Onshore (which accompanied the Foreshore Licence Application) where it is shown that the Earths geomagnetic field has a strength of 48uT for the project area. 15uT is a factor of 16 times lower than the lowest field level used in the attached research article (250 uT) and is a factor of 10 times lower than the range of field strengths estimated for typical subsea cables in the attached article (140uT to 8000uT). The low field strength for the Celtic Interconnector is due to the Bipolar System, bundled cable arrangement.

The potential for electromagnetic fields (EMF) emitted by subsea cables to disrupt electrosensitive and magneto sensitive fish have been discussed in s. 19.12.2 - Operational Phase Effects (Volume 3D2 Environmental Impact Assessment Report – Technical Chapters).

Whilst there remains the potential for some fish and shellfish to detect EMF emissions within the immediate locale of the cable to date there has been no evidence to indicate that the sensitivity and/or magnitude of these impacts are sufficient to significantly impact fisheries resources and no sensitivity thresholds for fish or shellfish in the environment have been proposed by regulators. For the field strengths of the Celtic Interconnector, the magnitude of this effect has been assessed as Negligible or Minor and not significant.

We note the concern expressed by fishing operatives regards EMF and will ensure appropriate cable burial depths that will indirectly reduce potential effects from electro-magnetic fields.



2. Public Submission 2

Response to Public Submission 2:

We recognise the importance of Youghal Bay to the inshore local fishing fleet that employs a diverse array of gear to harvest both shell- and fin-fish, including hand gathering of periwinkles. Our assessment was in part drawn from data derived from the Central Statistics Office (An Phriomg-Oifig Staidrihm) (2019).

By its very nature, the installation of the Proposed Development will cause disturbance to the seabed in the immediate vicinity however this disturbance will be temporary, mobile and localised, representing only a small footprint within the wider bay. Crustaceans are mobile species and relatively tolerant of temporary disturbance with high and rapid recoverability.

Inshore the course of the cable lies predominantly through soft sandy substrate where the target depth of cable lay is 1.8m below stable seabed. The proposed development has the potential to temporarily effect the shrimp fishery along the immediate course of the cable route.

The first phase of the cable installation sequence (the construction of a joint bay on land and connecting cable ducts to the intertidal zone) is anticipated to take between approximately six to ten weeks and will be focused outside the peak summer months, i.e. taking place October to April and undertaken predominantly on the foreshore and intertidal zone extending only a short distance into the subtidal zone using primarily land based equipment. Whilst these works will be carried out during the shrimp fishing season the location of the works and any associated exclusion zone should not significantly impact the shrimp fishing grounds.

The second phase of the cable installation sequence (final cable pull-in) that would occur in subtidal waters must take place in an appropriate window during the summer months, i.e. May to September, to coincide with favourable weather & tidal windows for nearshore cable installation. Although this time does overlap with the start of the Shrimp season (1st August), the window required is short (days) and Eirgrid will endeavour to carry out the works predominately outside of the shrimp fishing season (prior to August) but optimum tidal conditions may nonetheless require that these works take place in a short window during August to September. The area affected will be temporary, mobile and localised. The Fisheries Liaison Officer (FLO) will ensure timely engagement with the fishing community whose activities have the potential to be affected by the proposed development throughout construction and installation.

Eirgird are committed to appointment of a Fisheries Liaison Officer (FLO) who will ensure timely engagement with the fishing community whose activities have the potential to be affected by the proposed development throughout construction and installation.

Advanced warning and accurate location details of construction operation and associated mobile safety zones. Safety zones to be brought to the attention of mariners with as much advance warning as possible via frequent notice to Mariners and other means eg the Kingfisher Bulletin, VHF radio broadcasts etc. and through direct communications via the Fisheries Liaison Officer.



The request for a Fisheries Management and Mitigation Strategy (FMMS) is noted; we would propose that this forms part of the conditions attached to the Foreshore Licence, the contents of which to be discussed and agreed with relevant stakeholders prior to commencement of works.

We note the concerns of the stakeholder regards the need for open and timely communication. We are committed to the appointment of an FLO during the proposed development who will maintain communication with fisheries representatives and organisations throughout construction and installation in accordance with good practice (FLOWW, 2014) (S. 19.11 - Mitigation).

Responses to observations/recommendations received from the Prescribed Bodies Consultation

3. Marine Institute

EirGrid thanks the Marine Institute for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector.

We acknowledge the request that mitigation measures as outlined within Section 3.6 of Volume 6B of the application documentation (Appropriate Assessment Screening Report and Natura Impact Statement) form conditions in any Foreshore Licence issued, and are happy to support this request.

4. Inland Fisheries Ireland

EirGrid thanks the Inland Fisheries Ireland (IFI) for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector.

The IFI response is within the scope of works covered by the Foreshore Licence, and we agree with the requests to confirm burial option, provide signage for recreational anglers, adhere to the IFI Guidelines during construction works (where applicable), include the IFI in the emergency response plan, notify IFI in the event of water pollution, and give advanced notice for starting works (five days notification time, prior to works commencing).

The IFI have indicated no work should be carried out at night to reduce the impact on migratory species around the Blackwater Estuary. We would clarify that the works take place in 2 phases. Phase I refers to the preparatory works prior to cable pull-in, taking place in the period October to April outside bathing season and take place primarily on land and on the beach. These works will generally take place only during the day and are not considered to have any impact on the migratory fish.

Phase II covers the final cable pull-in works which are a continuous operation and are based on taking place during optimum tidal conditions. This operation will require vessels to be stationed at or near the end of the duct (LAT), setting up ready to commence the pull in through the duct. The pull in operation for each cable will take a matter of a few hours but may need to stop and re-start as the tide flows and ebbs. The operations will be timed to ensure that the majority of the work is during



daylight hours, but it is possible that it will need to start very early morning or continue late into the night. These operations form only a very small part of the works and will be undertaken over a few days only. We consider that the level of night-time work which may be required will have no significant impacts.

5. Geological Survey Ireland

EirGrid thanks Geological Survey Ireland for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector.

We welcome the list of publicly-available datasets applicable to the Celtic Interconnector project, and the acknowledgement that relevant datasets were included within the EIAR.

EirGrid can confirm that we will be glad to provide GSI with copies of reports detailing the results of future site investigations carried out in connection with the Celtic Interconnector, and will provide these via the email address provided.

6. Health and Safety Authority

EirGrid thanks the Health and Safety Authority for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector, and note that no specific observations have been made.

7. Department of the Environment, Climate and Communication

EirGrid thanks the Department of the Environment, Climate and Communication for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We welcome the confirmation that the proposed Celtic Interconnector project is consistent with relevant Government energy and climate policy.

8. Environmental Protection Agency

EirGrid thanks the Environmental Protection Agency for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector.

In particular, we welcome confirmation that there is no requirement for a Dumping at Sea Permit under the Dumping at Sea Act 1996 (as amended). The Agency's position that operation and construction of the proposed Celtic Interconnector shall not result in a contravention of the Water Framework Directive, Marine Strategy Framework Directive, Bathing Water Directive or Environmental Liabilities Directive.



9. Underwater and Archaeology Unit / National Parks and Wildlife Service

EirGrid thanks the Underwater Archaeology Unit for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector.

With regards to the specific comments raised, the EIAR mitigations were set out as in-principle proposals, and consequently the additional detail provided by the UAU provides welcome detail on which to base a more detailed project design for an Underwater Archaeological Impact Assessment (UAIA) and, where appropriate, further mitigation proposals. It is confirmed that the project design will be prepared by an appropriately qualified licence-eligible marine archaeologist. This investigative scope will be agreed with the UAU to ensure compliance with the relevant requirements of any necessary licencing, and that the proposed investigative works are appropriate to the aims and scope of the project and can be safely delivered.

10. Department of Agriculture, Food and the Marine

EirGrid thanks the Department of Agriculture, Food and the Marine for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We welcome the confirmation that there are no objections raised to any licence which may be issued for the project.

11. Marine Survey Office

EirGrid thanks the Marine Survey Office for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector, and welcome the conclusion that the Office has no objections to the project from a navigational safety perspective.

It is also confirmed that an appropriate Marine Notice shall be prepared and published, detailing planned works, and the vessels to be engaged in those works. These shall be distributed by all appropriate means for the duration of works, and updated as necessary.

Further, EirGrid shall ensure full details of the project, specifically the final cable route, depth and shore markings of the cable are submitted to the United Kingdom Hydrographic Office for inclusion on relevant navigation charts.

12. Bord lascaigh Mhara

EirGrid thanks Bord lascaigh Mhara for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector, and notes that no specific, separate submission is being made at this time, following previous submission via the Department of Agriculture, Food and the Marine.



13. Commissioners of Irish Lights

EirGrid thanks the Commissioners of Irish Lights for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We can confirm that CIL will be consulted during the installation phase of the project to avoid any adverse effects on navigational safety in the vicinity of the works.

14. Sea-Fisheries Policy Management Division, Department of Agriculture Food and the Marine

EirGrid thanks the Sea-Fisheries Policy and Management Division, Department of Agriculture, Food and the Marine for taking the time to provide a detailed response to Foreshore Licence application FS006916 for the Celtic Interconnector.

Point 1 and 2

We acknowledge that herring are a vitally important part of the ecosystem and a valuable fishery species. Also, that the Celtic Sea Herring (CSH) stock has fallen to its lowest ever observed biomass (Figure 2 in your consultation response), is sensitive (ecologically and economically) and activities that have the potential to disturb the life-cycle of these fish must be avoided. Also, that spawning is known to occur between late August / September and March and with the first phase of the installation sequence being completed in the winter months there is a seasonal overlap for the herring spawning period.

With reference to (Figures 3 and 4 in your consultation response), the route option that has been assessed within the EIAR is the option that lands at Youghal (Claycastle Beach). On this basis it is evident that direct disturbance and impact to all herring spawning grounds have been avoided.

The footprint of the cable corridor through the nearshore environment is considered to be localised. Within the EIAR it was also identified that benthic habitat along the cable corridor from Claycastle Beach and within Youghal Bay did not identify optimal herring spawning habitat or features / significant substrate that may provide habitat for herring spawning. Whilst fish may occasionally spawn on features within the intertidal zone these eggs may become desiccated or predated during low water periods and are not considered to contribute to recruitment.

Point 3

We agree with the recommendation to liaise with the national representative organisations and their members who operate in the area i.e. the local fishing producer organisations, as the project continues to progress. The following organisations shall be added to the list of proposed contacts for any future engagement on the project:

- Irish South & East Fish Producers Organisation.
- National Inshore Fisheries Forum.



- Regional Inshore Fisheries Forums.
- Irish South & West Fish Producers Organisation.

We also agree that the FLO should be a key link with the stakeholders in the Celtic Sea fisheries and will need to keep them well informed on key developments e.g. restrictions because of cable laying and rock armour deployments. Also, the FLO is key for implementing the measures to offset the effects to fisheries.

Point 4

For overlap with the Labadie Nephrops grounds (Figure 6 in your consultation response), these are located beyond the limits of the Foreshore Licence application FS006916. It is however noted that these grounds will not be avoided completely, in the waters beyond the 12nm, and only a very small percentage of the entire grounds will be intersected. It is also agreed that prior engagement with the fishing industry will be carried out to ensure the minimum disruption.

For the survey of fishing vessels, it is noted that this assessment was carried out using best available information (project specific reports from Wood, NetWork Services and Anatec Limited to EirGrid & RTE), liaison work undertaken by the proposed FLO, review of a list of peer-reviewed and grey literature and was supported further by a data request to the Sea Fisheries Protection Authority. The date range for the available project specific reports is also noted from 2013 to 2019. The applicant acknowledges continuing developments in the marine environment and are committed to ongoing stakeholder engagement and information gathering. For demersal (whitefish) seine net fishing, Section 19.7 (Page 351) of the EIAR sets out the principal target species for the commercial fisheries in the Celtic Sea and provides a focus on demersal fish and those that are captured via seine vessels (notably whiting *Merlangius merlangus* and Atlantic mackerel *Scomber scombrus*). Also, with reference to Figures 5 and 6 in your consultation response, it is noted that international fishing activity for Danish Seine and Scottish Seine (Figure 5) is primarily located out with the limits of the Foreshore Licence application FS006916 (beyond 12nm), and the majority of the route (within 12nm) does not intersect any of the main demersal (whitefish) fishing grounds.

For the fishing industry representative organisations providing comments on how the survey data compares to the current fishing operations and potential associated changes to fisheries management, the applicant again acknowledges continuing developments in the marine environment and are committed to ongoing stakeholder engagement and information gathering.

It is also recognised that the FLO will be key for implementing measures to offset the effects to fisheries and that the FLO will make contact and keep all relevant stakeholders in the Celtic Sea fishery informed.

Point 5

For interactions between gear and the seabed, concerns about possible interaction of fishing gear with the cable (notably rock placements/berms/concrete mattressing, exposed cable and entanglement of passing demersal (whitefish) seine nets, dredges, static nets, traps and scallop gear



with 50mm substrate penetration) is recognised, and we will discuss the mitigation measures with fishing industry representatives (where applicable).

Exposed cable is not likely to restrict fishing activity providing the target burial depth is met, the seabed is restored to its original profile and it remains following installation and during operations.

For rock placements/berms/concrete mattressing, Section 8.4.3 (Page 91) of the EIAR identifies that these are not anticipated within the first 18km of the cable from the landfall at Claycastle Beach. This covers the majority of the seabed area within the limits of the Foreshore Licence application FS006916 and for the remaining 3km in the Irish territorial waters (within 12nm) the water depth is over 60m BCD.

It is noted that entanglement does not apply to all activities (i.e. deploying static nets, traps and use of scallop gear with 50mm substrate penetration, which has been identified as a receptor beyond 12nm within the Irish EEZ) and / or during the operational phase of the Project (i.e. beyond any temporary fishing vessel exclusion periods during installation).

Section 19.11 (Page 364 and 365) of the EIAR identifies that seabed obstructions created by installation of the marine cables, that are considered to pose a risk to the fishing industry will be made safe for towed fishing gear. Also, that where seabed obstruction such as rock berms and concrete mattressing will be installed (where cable burial has not been possible), they will be designed to have a smooth over-trawlable profile so that they do not present an obstruction to fishing activity (i.e. ensuring operational safety and minimising risk of gear snagging). The locations of any rock placement/berm/concrete mattress will also be communicated to fishermen via Notice to Mariners.

Point 6

For concerns over use of AIS data, it is noted that this assessment was carried out using best available information (Anatec Limited to EirGrid & RTE) with the AIS coupled with VMS data for commercial fishing vessels and qualitative information on recreational vessels/small fishing craft from local harbours (where available). Consultation also took place with the Ballycotton and Youghal Fisherman's Associations in 2017 and 2018, and further consultation with the national representative organisations and their members who operate in the area (i.e. the local fishing producer organisations) will be undertaken as part of the process of communicating detailed proposals for construction activity, when these are available.

With reference to the comparison that is being made between the main areas of fishing activity, 1) the area close to the Irish shore, and 2) south of the Scilly Isles (Fig 7.15 and 7.16 of the Vol 3D2 Appendices), and the findings of the ICES VMS data (Fig 5 in your consultation response) these datasets are not directly comparable. The former is illustrating a total of 12 months fishing crossing frequency and fishing crossing results by gear type (below 6 knots and varied gear types e.g. including pelagic) in the period April to September 2014 and May to October 2015. It also has a different purpose and is attempting to identify risk from fishing vessels. The latter is illustrating international fishing activity in a different period (2013-18), is specific to mobile bottom fishing only and is attempting to reduce fishing disturbance on the seafloor habitats that affect fisheries landings and value.



As an additional observation the 'All mobile bottom gears' part of Figure 5 in your consultation response does actually show a main area of fishing activity close to the Irish shore. The 'Bottom trawl - Demersal fish' and 'Beam trawl - Demersal Fish' parts of Figure 5 in your consultation response also show areas of fishing activity to the south of the Scilly Isles. Both of these overlap with sections of high annual fishing crossing frequency and high annual fishing crossing results by gear type (Figures 7.15 and 7.16 of the Vol 3D2 Appendices).

Also, it is possible that the sections to the south of the Scilly Isles (Figures 7.15 and 7.16 of the Vol 3D2 Appendices) is showing high annual fishing crossing frequency and high annual fishing crossing results by gear type (beam trawlers in particular), as the model is picking up on these beam trawlers as they slowly (<6 knots) navigate and traverse in and out of the mid to northern waters of the English Channel entrance. It is also possible that they are not actively fishing within the dataset and time period that was examined and this caveat is identified in the Anatec work (Vol 3D2 Appendices).

15. Marine Advisor, Department of Housing. Local Government and Heritage

EirGrid thanks the Marine Advisor of the Department of Housing, Local Government and Heritage for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We welcome the Advisor's conclusion that in principle they have no objections to the application, noting the recommendation that the Foreshore Unit engage a suitably-qualified Independent Environmental Consultant to undertake independent assessment of the application.

16. Engineering Inspector and Marine Advisor, Department of Housing. Local Government and Heritage

EirGrid thanks the Engineering Inspector and Marine Advisor of the Department of Housing, Local Government and Heritage for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We welcome the conclusion that there are no conflicts between the proposed project and existing licences / applications, and that the works will not have significant adverse impacts on the public use of, access to, and enjoyment of the area and its users.

Further, we acknowledge the request that the granting of any Foreshore Licence be subject to the conditions presented, and are happy to support this request.

17. Sea Fisheries Protection Authority

EirGrid thanks the Sea Fisheries Protection Authority (Eastern Region) for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We confirm acceptance of your request and confirm that you will be notified immediately (as a statutory body and regulator for the sea-fisheries and seafood production sectors) of any pollution incidents. These will be reported to the local SFPA office also (assumed to be Dunmore East, County Waterford).



18. Met Eireann

EirGrid thanks Met Eireann for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We acknowledge the requirement for dust mitigation measures to be implemented, to avoid negative impacts arising on the climate monitoring station north of Claycastle Beach; this will be implemented through liaison with contractors, once commissioned.

19. Department of Defence

EirGrid thanks the Department of Defence for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. The Department's own consultation with the Naval Service is noted, and the conclusion that there are no observations made on the application.

20. Irish Coast Guard and Maritime Service

EirGrid thanks the Irish Coast Guard and Maritime Service for taking the time to provide a response to Foreshore Licence application FS006916 for the Celtic Interconnector. We note that there are no specific comments raised at this point, and also confirm that the full suite of Marine Notices will be issued in relation to works on the project, the distribution of which will include the Irish Coast Guard.

21. Bird Watch Ireland

EirGrid thanks Bird Watch Ireland for taking the time to provide an initial response to Foreshore Licence application FS006916 for the Celtic Interconnector, and understand that a fuller response may be received in due course, following a more detailed review of the presented documentation.

To confirm, the particular volumes / sections of the marine-related application which we believe are most pertinent to Bird Watch Ireland are:

- Volume 3D1, presenting an introduction to and overview of the project;
- Volume 3D2 (Chapters 5 and 6), presenting a detailed description of the project;
- Volume 3D2 (Chapter 13), presenting the impact assessment in relation to marine biodiversity (including ornithology); and
- Volume 6B, presenting the findings of the Appropriate Assessment Screening Report and Natura Impact Statement.

With regards to the queries raised, EirGrid can confirm that Claycastle Beach is the final choice for the Celtic Interconnector's landfall, and a detailed description / environmental assessment of the route between Claycastle Beach and the substation is provided within EIAR Volume 3C Part 2, with biodiversity specifically (including birds) addressed in Chapter 8 (p.213-369). The appendices to EIAR



Volume 3C Part 2 Chapter 8 biodiversity (Appendices 8.1-8.6) include the complete baseline bird survey reports in Appendix 8.6.



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APPENDIX 1 - Public Submissions

DIRECTORS: Brendan Tuohy Chair



APPENDIX 2 – observations/recommendations received Prescribed Bodies