1 INTRODUCTION

1.1 Context

This Environmental Impact Assessment Report (EIAR) has been prepared by RPS on behalf of Donegal County Council (DCC) for the Burnfoot Flood Relief Scheme (FRS), hereafter called the Proposed Scheme.

An Environmental Impact Assessment (EIA) Screening Statement on the Proposed Scheme was issued to Donegal County Council in November 2022. The statement determined that the preferred option for the Proposed Scheme falls under Schedule 5 Part 2 of the Planning and Development Regulations 2001, as amended. This determination is due to the Proposed Scheme exceeding the criteria applicable *to Part 2 Class 10. Infrastructure Projects (f) (ii) Canalisation and flood relief works, where the immediate contributing sub-catchment of the proposed works (i.e. the difference between the contributing catchments at the upper and lower extent of the works) would exceed 100 hectares or where more than 2 hectares of wetland would be affected or where the length of river channel on which works are proposed would be greater than 2 kilometres.*

The overall contributing catchment area is 134.5 hectares therefore exceeds the 100 hectare threshold therefore; it was concluded that a full EIA is required for the Proposed Scheme. The full EIA Screening Statement for the Proposed Scheme can be found in Volume III Technical Appendices, Appendix 1.1.

Following this an EIA Scoping Report was prepared in order to facilitate a scoping exercise with statutory bodies to ensure that the information contained in the EIAR and what methods should be used to gather and assess that information is adequate. The scoping was submitted to the statutory bodies in May 2023.

1.2 Purpose of the EIAR

Environmental Impact Assessment (EIA) is a procedure under the terms of European Directives[1] for the assessment of the likely significant effects of a project on the environment. An Environmental Impact Assessment Report (EIAR) is a statement prepared by the applicant, providing information on the likely significant effects on the environment based on current knowledge and methods of assessment. It is carried out by competent experts, with appropriate expertise, to provide informed assessment within their discipline.

1.3 Function of the EIAR

This EIAR is a report of the effects, if any, which the Proposed Scheme, if carried out, would have on the environment, and includes the information specified in Annex IV of the Environmental Impact Assessment Directive. The EIAR is the document prepared on behalf of the developer that presents the output of the assessment conducted on behalf of the developer, and contains information regarding:

[1] *EU Directive 85/337/EEC as amended by Directives 2011/92/EU and DIRECTIVE 2014/52/EU*

a. the project;

b. the likely significant effects of the project;

c. the baseline scenario;

d. the proposed alternatives;

e. the features and measures to mitigate adverse significant effects;

f. any additional information specified in Annex IV of the EIA Directive; as well as

g. the Non-Technical Summary.

The EIAR must include the necessary information for the competent authority to reach a reasoned conclusion and should be of a sufficient quality to enable this judgement. Many of the EIA Directive's requirements and provisions aim to ensure that the EIAR is of a sufficient quality to effectively serve this purpose. Article 5 of the EIA Directive sets out what must be included in the EIAR, and how to ensure that it is both of a sufficient high quality and complete.

The EIAR has been prepared following an examination, analysis, and evaluation of the direct and indirect significant effects of the project in relation to the receiving environment.

1.4 Technical Difficulties or Lack of Data

The compilation of the information necessary for the EIAR did not present any significant difficulties. In addition to published datasets, the preparation of the EIAR has drawn on the dedicated programme of environmental surveys that was undertaken during the development of the Proposed Scheme, through a detailed environmental constraints study, dedicated field surveys, consultations, collaborative workshops with the client, OPW, project technical team, statutory consultees, and public information days.

The site-specific scientific data collected to date was used to support the preparation of the EIAR for the Proposed Scheme and serves to illustrate the depth of understanding of the environment in and around Burnfoot, including the Burnfoot Village, Burnfoot River, Skeoge River and downstream European Sites.

The preparation of the EIAR was further assisted by the extensive environmental datasets collated during the preparation of the constraints study undertaken at the early stages of the project to establish the main environmental constraints in the receiving environment so as to inform the option development process and preliminary design of the Proposed Scheme.

Additional survey work has been undertaken in order to provide up-to-date baseline information on which to undertake the environmental assessments, in addition to the site-specific information from the existing databases from official sources, as detailed within specific chapters of this EIAR and summarised below:

- Archaeological Walkover surveys;
- Archaeological metal detection and wade survey;
- Archaeological Test Trenching;
- On-site visual inspection of Burnfoot Bridge by a built heritage consultant that has been augmented by a detailed photographic record, and

- Measured survey drawings (CAD) of the Burnfoot Bridge structure for built heritage appraisal and illustration purpose.
- Invertebrate Surveys;
- Fish habitat Surveys;
- Electrofishing Surveys;
- Habitat Surveys;
- Protected Species Surveys;
- Overwintering Bird Surveys;
- Hydrological Analysis;
- River Hydromorphological Surveys;
- Noise surveys;
- Invasive Species Surveys;
- Photographic Surveys for viewpoint assessment and photomontage production;
- Topographical Surveys;
- Ground Investigations;

1.5 Requirement for the EIAR

The Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2022, illustrate the position of this EIAR within the overarching EIA process (Figure 2.1 of the Guidelines reproduced in Figure 1.1 of this Chapter of the EIAR).

The Proposed Scheme falls within the following class of development identified in Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) and paragraph 10(f) of Annex II of the Directive 2014/52/EU (the EIA Directive):

10 (f)(ii) - Canalisation and flood relief works, where the immediate contributing sub-catchment of the proposed works (i.e., the difference between the contributing catchments at the upper and lower extent of the works) would exceed 100 hectares or where more than 2 hectares of wetland would be affected or where the length of river channel on which works are proposed would be greater than 2 kilometres.

Screening, in respect of the Proposed Scheme, was undertaken on behalf of the applicant, DCC. It was determined that the thresholds set out in the EIA Directive, and applicable Irish Regulations, were exceeded, and therefore an EIA would be required to be undertaken by the relevant competent authorities on the respective applications for development consent.

Directive 2014/52/EU includes a requirement for a developer (in this case, DCC) to prepare and submit an Environmental Impact Assessment Report (EIAR) to the competent authority. For the purposes of the application for permission made pursuant to the Planning and Development Acts, the obligations under Directive 2014/52/EU have been transposed into Irish law pursuant to the European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I No. 296 of 2018).

This EIAR has been prepared in compliance with the requirements of Directive 2014/52/EU, and the Irish regulations in force as at the date of its finalisation.

For the purposes of the application for permission, under the provisions of section 175(3) of the Planning and Development Act 2000 (as amended), (the Planning and Development 2000 Acts) and Part 10 of the Planning and Development Regulations (as amended), where an EIAR has been prepared for local authority development the local authority shall apply to the Coimisiún for approval. Accordingly, the application for permission must be made directly to An Coimisiún Pleanála (the Coimisiún) under section 175(3) of the Planning and Development Acts.

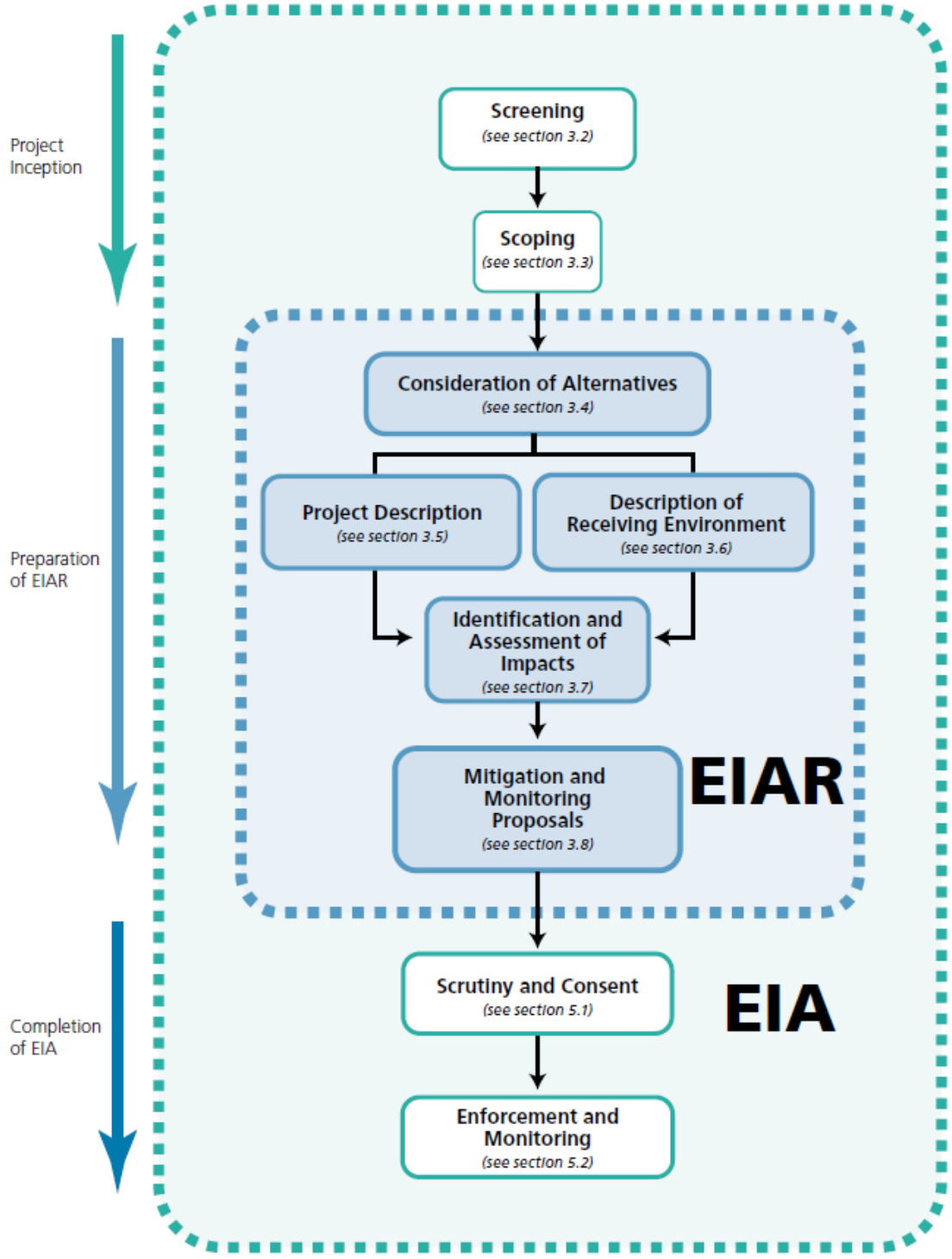

Figure 1.1: The Position of this EIAR within the EIA Process

1.6 Methodology and Structure of the EIAR

The main aim of this EIAR is to provide information on the project to the public, prescribed bodies and the competent authority. To this end, Article 3(1) of the EIA Directive requires that significant effects are identified, assessed, and described in an 'appropriate manner'. Article 5(1) of the EIA Directive sets the form of the information that should be presented in an EIAR to enable stakeholders and authorities to form opinions, and to make decisions regarding the project. While there are no formal requirements concerning the format and the presentation of the report, this EIAR clearly sets out the methodological considerations and the reasoning behind the identification and assessment of likely significant effects.

1.6.1 EIAR Content

Article 5(1) sets out what must be included as a minimum in the EIA Report. Annex IV to the Directive, expands on these requirements. In short, this includes the following:

a. A description of the project: this is an introduction to the project and includes a description of the location of the project, its characteristics, including land use requirements during construction and operational phases, as well as estimates of the expected residues, emissions, and waste produced during the construction and operation phases.

b. Baseline scenario: a description of the relevant aspects of the current state of the environment, and the likely evolution thereof, without the implementation of the project, on the basis of the availability of environmental information and scientific knowledge.

c. Environmental factors affected: a description of the environmental factors likely to be significantly affected by the project, including consideration of climate change mitigation and adaptation, biodiversity, natural resource sustainability, and the risks of major accidents and disasters.

d. Effects on the environment: a description of the likely significant effects of the project on the environment. Such significant effects include direct and indirect, secondary, cumulative, transboundary, short-term, medium-term, and long-term, permanent, and temporary, and positive and negative, as appropriate.

e. Assessment of alternatives: a description of the studied reasonable alternatives to the project, with an indication of the main reasons for the selection of the option chosen, including a comparison of environmental effects.

f. Mitigation measures: a description of the measures envisaged to avoid, prevent, reduce and, where possible, offset any identified significant adverse effects on the environment, including a determination of the effectiveness of such measures, their reliability and certainty, as well as the commitment to ensuring their practical implementation and monitoring of results.

g. Monitoring: a description of any measures proposed to monitor significant adverse effects on the environment and/or measures taken to mitigate them.

h. Non-Technical Summary: an easily accessible summary of the content of the EIAR presented without technical jargon, hence understandable to anybody without a background in the environment or the project.

i. Quality of the EIAR: the experts responsible for preparing the EIAR are competent.

1.6.2 Assessment Methodology

1.6.2.1 Baseline Scenario

An assessment of the relevant aspects of the current state of the environment, and the likely progression thereof, without implementation of the project, is undertaken by relevant and qualified experts on the basis of the environmental data and scientific knowledge which is available.

The outcomes of the assessment are provided in a description of existing environmental conditions, and the do-nothing scenario, within each environmental topic chapter. This forms the foundation against which likely significant effects can be compared and evaluated. It further provides the basis upon which the existing environment versus post scheme environment monitoring that can be used to measure change once the project has been initiated.

1.6.2.2 Environmental Factors

Article 3(1) details that the following environmental factors are considered so as to appropriately identify, describe, and assess the likely significant effects which might impact upon them as a result of the implementation of the project:

a. Biodiversity, flora, and fauna;

b. Land, soils, geology, and hydrogeology;

c. Water quality and flood risk;

d. Air;

e. Climate;

f. Noise and vibration;

g. Material assets – services

h. Material assets - transportation

i. Archaeology and cultural heritage;

j. Landscape and visual;

k. Population and human health; and

l. Waste.

The Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2022, illustrate the EIA process flow chart which is applied to each environmental factor (Figure 2.2 reproduced in Figure 1.2 of this Chapter of the EIAR). It illustrates that the EIA process can be considered as involving three main parts.

1. The first consists of a compilation of facts – i.e., the description of the existing environment and the description of the Proposed Scheme.
2. The second consists of predictions of likely effects – this may be carried out on an iterative basis as the design is improved to eliminate excessive adverse effects.
3. The final part consists of the assessment of the environmental effects as part of a consent process which may decide to grant, condition, refuse or seek additional information.

Specific topic-related methodologies are outlined in each section.

Further to these, consideration is also given to the below factors. These are incorporated into assessment procedures so as to provide a complete understanding of the interaction between the project and the environment.

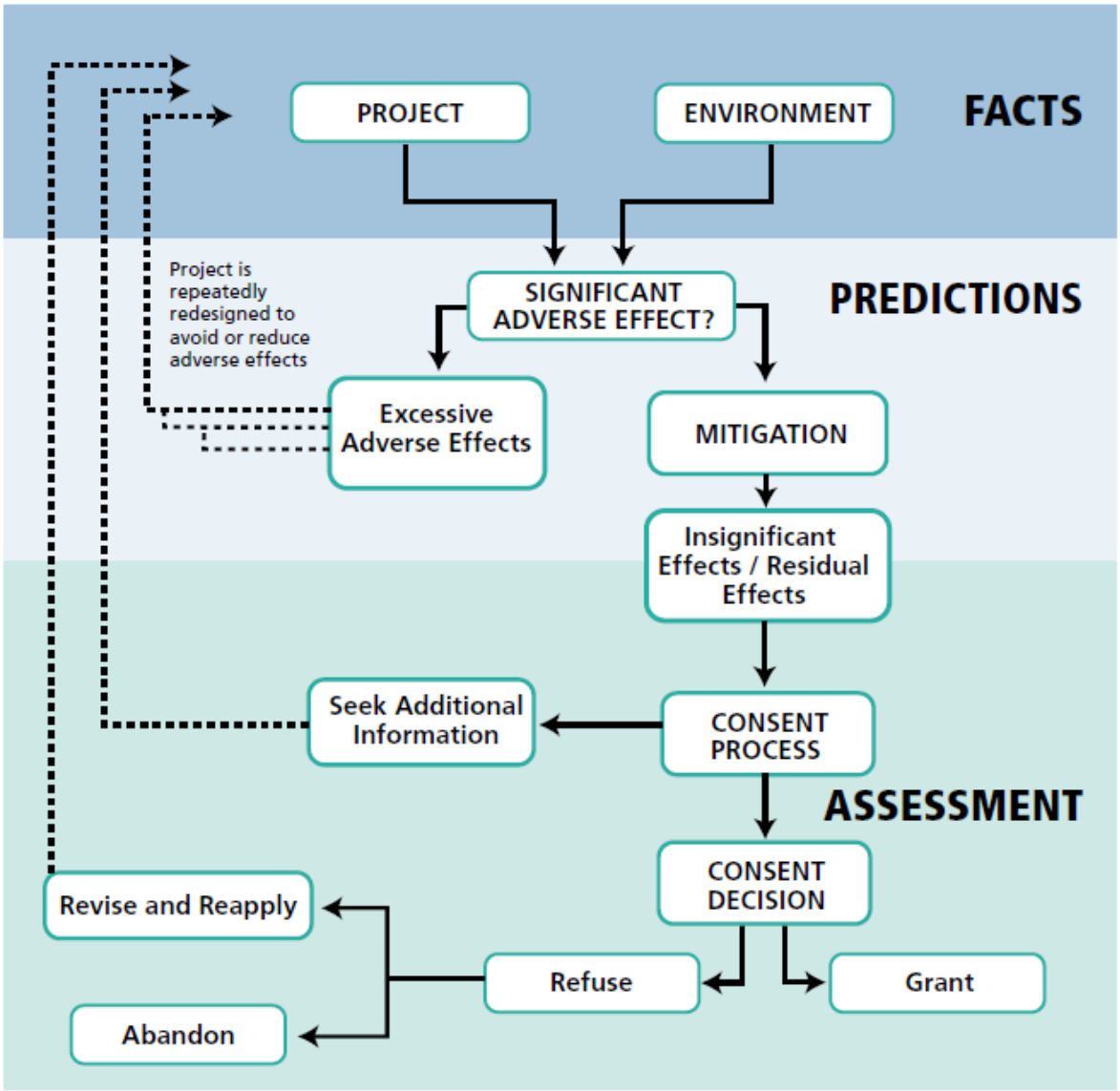

Figure 1.2: EIA Process Flow Chart

Climate Change

In addition to considering the effects of the project upon climatic factors, consideration is also given to the compliance with the Climate Action Plan 2025 (CAP25), and the vulnerability of the project to future changes in the climate, and to its capacity to adapt to such changes into the future.

Accidents and Disasters

Consideration is given to the potential of the project to cause accidents and/or disasters (both natural and man-made), and to the vulnerability of the project to potential accidents and/or disasters.

Biodiversity

Further to consideration of the effects of the project upon flora and fauna, particularly with regard to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC, consideration is also given to the effects of the project upon biodiversity; understood to be the interactions and variety of, and variability within species, between species and between ecosystems.

Natural Resources

Consideration is given to the sustainability of resources, particularly with regard to land, soil, water, and biodiversity, as well as energy. The assessment of the project's impacts upon the availability of natural resources is in addition to the assessment of the impacts of the project upon the resource itself.

Assessing Impacts

The identification, description, and assessment of the effects of the project upon the aforementioned factors is premised upon an understanding of the likely magnitude of predicted impacts and the sensitivity to change of affected receptors. This provides for a determination of the likely significance of effects.

The baseline scenario relating to each environmental factor is used to identify potential receptors. The sensitivity of a given receptor is dependent on the receptor concerned, and the effect to which it is subject. For this reason, given that sensitivity is context-specific, it is thus defined within each topic chapter, but nonetheless considers:

a. The vulnerability of the receptor;

b. The capacity of the receptor to recover; and

c. The value / importance attributed to the receptor.

An impact is defined as a physical change to the environment which is attributable to the implementation of the project. The impacts which are likely to arise, and their magnitude, are detailed within individual topic chapters. Nonetheless, unless otherwise stated, the magnitude of impacts generally takes into account factors such as:

a. The extent of the impact;

b. The duration of the impact;

c. The frequency of the impact; and

d. The capacity for the impact to be reversed.

The significance of an effect, defined in terms of the express consequence of an impact, is determined with regard to the magnitude of the impact and the sensitivity or value of the receptor. Resultantly, the level of significance of effects is defined separately within each section. With that being said, the following provides an indication of the categorisation of the scale of significance:

More Significant

Effects which are substantial. They represent key factors in the decision-making process with regard to planning consent. These effects are generally, but not exclusively, associated with site or features of international, national, or regional importance that are likely to suffer the most damaging impact and loss of resource integrity.

Effects which are major. These beneficial or adverse effects are considered to be very important considerations and are likely to be material in the decision-making process.

Effects which are moderate. These beneficial or adverse effects may be important but are not likely to be key decision-making factors. The cumulative effects of such factors may influence decision making if they lead to an increase in the overall adverse effect on a particular resource or receptor.

Effects which are minor. These beneficial or adverse effects may be raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project.

Effects which are negligible. No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.

Less Significant

Effects are also considered, and categorised, in terms of being direct and indirect, secondary, cumulative, transboundary, short-term, medium-term, and long-term, permanent, and temporary, and positive and negative, as appropriate.

Cumulative effects are changes to the environment that are caused by an action in combination with other actions. They can arise from a number of sources, where relevant, including:

- The interaction between all of the different projects in the same area; and
- The interaction between the various impacts within a single project.

The cumulative effects of the Proposed Scheme, in conjunction with other proposed projects, are considered within each topic chapter. Relevant developments considered within the cumulative assessments include those which are:

- Under construction;
- Permitted, but not yet implemented;
- Submitted, but not yet determined; and
- Identified in the Development Plan (and emerging Development Plans – with appropriate weight being given as they move closer to adoption), recognising that much information on any relevant proposals is limited.

It is noted that developments that are built and operational at the time of submission are considered to be part of the existing baseline conditions.

Each topic chapter further considers whether there are significant cumulative effects which are likely to arise as a result of interaction between effects as part of the same project, so as to identify potential secondary, cumulative, or synergistic effects.

1.6.2.3 Assessment of Alternatives

Assessment of reasonable alternatives is mandatory under the EIA Directive. The process allows for adjustment to minimise environmental impact thus minimising project significant effects on the environment.

Alternatives are different ways of carrying out the Project in order to meet its agreed objective and there are a range of types of alternatives in relation to a Project:

- Design;
- Technology;
- Location;
- Size; and
- Scale.

The Department of Housing, Local Government and Heritage Guidelines for Planning Authorities and An Coimisiún Pleanála on carrying out Environmental Impact Assessment (August 2018) state that the EIA Directive requires that an EIAR includes *"a description of the reasonable alternatives studied ….. which are relevant to the project and its specific characteristics".* This *"must also indicate the main reasons for the option chosen taking into account the effects of the project on the environment ….. The type of alternatives will depend on the nature of the project proposed and the characteristics of the receiving environment ….. It is generally sufficient for the developer to provide a broad description of each main alternative studied and the key environmental issues associated with each. A 'mini- EIA' is not required for each alternative studied."*

Assessment of alternatives includes consideration of the avoidance, prevention, reduction, or offsetting of adverse environmental effects, which may be described at a number of levels including:

- those assessed at plan stage (which the EU guidance states *"it would likely be unnecessary to consider them again")* and
- those assessed at design stage (which the EU guidance describes as *"alternatives or variants of Project components in order to mitigate significant environmental impacts that emerge during assessment"*).

1.6.2.4 Mitigation Measures

Where required, mitigation measures are identified and described within individual topic chapters. These are measures which could further avoid, prevent, reduce and, where possible, offset likely significant adverse effects upon the environment as described in Recital (35) of Directive 2014/52/EU.

A description of those adverse effects which proposed mitigation measures are intended to avoid, prevent, reduce, or offset are provided in addition to a summary regarding the measure's effectiveness, reliability,

and certainty, as well as the commitment to ensuring their practical implementation and monitoring of results.

1.6.2.5 Monitoring

Further to mitigation measures, appropriate and proportionate monitoring measures are also identified and summarised within individual topic chapters.

Such monitoring measures may arise either as a result of legislative requirements and/or directly in relation to the effects of the project upon environmental factors. Nevertheless, duplication of efforts will be strictly avoided.

In any case, monitoring measures will be developed so as to ensure that:

- Significant adverse impacts from the construction and operation of projects do not exceed impacts projected in the EIAR, and that measures taken to avoid, prevent, reduce and/or offset such impacts are carried out as planned;
- Mitigation methods can be assessed for robustness. This can help to improve the identification of impacts in future EIARs;
- The EIAR is in line with other EU legislation, especially the SEA Directive; and that
- The systematic ex-post impact monitoring of adverse significant effects, resulting from the project, offers an opportunity to identify if forecasted impacts are not developing as predicted, so that steps may be taken for rectification.

1.6.2.6 Conclusion on Likely Significant Effects

A conclusion by the authors of the EIAR on the likely significant effects of the Project on the environment, taking into account the results of the examination of the information presented in the EIAR is provided. In addition, a summary of the key impacts and mitigation and monitoring measures associated with the Project is provided, along with a discussion of cumulative impacts, interactions, and inter-relationships between environmental factors. This conclusion will inform the reasoned conclusion to be made by the competent authority in conducting the EIA.

1.6.3 Structure of the EIAR

The EIAR has been structured in accordance with the European Commission's Guidance "Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)" (2017). Accordingly, the EIAR:

a. Is presented with a clear structure with a logical sequence that describes, inter alia, existing baseline conditions, predicted impacts (nature, extent, and magnitude), scope for mitigation, proposed mitigation measures, significance of unavoidable/residual impacts for each environmental factor;

b. Contains a table of contents at the beginning of the document;

c. Comprises a description of the development consent procedure and how EIA fits within it;

d. Reads as a single document with appropriate cross-referencing and is concise, comprehensive, and objective;

e. Is written in an impartial manner without bias;

f. Includes a full description and comparison of the alternatives studied;

g. Makes effective use of diagrams, illustrations, photographs, and other graphics to support the text;

h. Uses consistent terminology with a glossary;

i. References all information sources used;

j. Has a clear explanation of complex issues;

k. Contains a good description of the methods used for the studies of each environmental factor;

l. Covers each environmental factor in a way which is proportionate to its importance;

m. Provides evidence of effective consultations;

n. Provides a basis for effective consultations to come;

o. Makes a commitment to mitigation (with a programme) and to monitoring;

p. Contains a Non-Technical Summary which does not contain technical jargon;

q. Contains, where relevant, a reference list detailing the sources used for the description and assessments included in the EIAR.

The Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2022, illustrate a general seven step sequence which helps ensure an objective and systematic approach to the EIAR process (Figure 3.1 reproduced in Figure 1.3 of this Chapter of the EIAR).

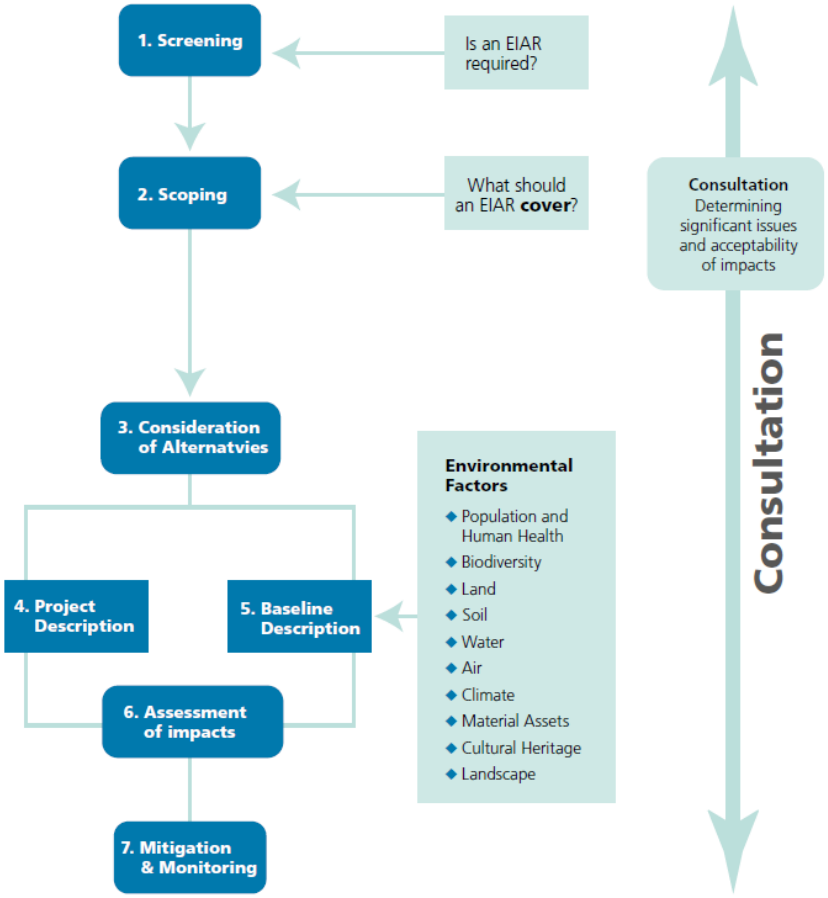

Figure 1.3: EIAR Contents and General Sequence

Following this approach, this EIAR is broken down into the following Chapters.

STAGE 1

- Introduction and Screening

STAGE 2

- Need for the Project
- Project Scoping and Consultation

STAGE 3

- Examination of Alternatives

STAGE 4

- Project Description
- Risk of Major Accidents

STAGES 5 AND 6 (by environmental factor)

- Subsequent chapters address specific environmental factors and provide a description of the existing environment, the likelihood of effects, the significance of effects, remedial and mitigation measures, residual impacts, and monitoring measures. The specific environmental factors considered are:
  i. Biodiversity, Flora, and Fauna
  ii. Land, Soils, Geology and Hydrogeology

iii. Water Quality and Flood Risk Assessment

iv. Air Quality

v. Climate

vi. Noise and Vibration

vii. Material Assets

viii. Cultural Heritage (including Architectural and Archaeological)

ix. Landscape and Visual

x. Population and Human Health

xi. Waste

STAGE 7

- Cumulative Effects and Environmental Interactions
- Summary of Mitigation Measures and Conclusion
- References and Bibliography
- Glossary of Terms

The advantages of using this type of format are that it is easy to examine each environmental topic and it facilitates easy cross-reference to specialist studies undertaken as part of the assessment.

Each topic of environmental assessment is considered as a separate chapter and is drafted by relevant specialists. The EIAR is presented in three volumes of the application documentation, as follows:

1. EIAR Non-Technical Summary
2. EIAR Main Document
3. EIAR Appendices

The production of the EIAR has been co-ordinated by RPS. The EIAR structure, responsibility and qualified input for each chapter are detailed in Table 1.1.

Table 1.1: List of Contributors to EIAR Chapters

Chapter of EIAR	Lead Author(s)	Company	Subject	Qualifications
Chapter 6	David Kelly	Paul Johnston Associates	Biodiversity - Aquatic	Ph.D., MCIEEM, MIFM
Chapter 7	James McCrory	RPS	Biodiversity, Flora & Fauna Terrestrial Biodiversity	BA (Mod) MSc CEcol CEnv MCIEEM CBiol MRSB
Chapter 8	Mark Magee	RPS	Population and Human Health	BA (Mod) MSc CEnv CSci CWEM CIWEM
	Conor Sweeney			BA (Mod) MSc

Chapter of EIAR	Lead Author(s)	Company	Subject	Qualifications
Chapter 9	Diane Mc Ginnis	RPS	Flood Risk Assessment	BEng CEng MICE MIEI
Chapter 10	Mark Magee	RPS	Water Quality	BA (Mod) MSc CEnv CSci CWEM CIWEM
Chapter 11	Joe McGrath	RPS	Land, Soils, Geology & Hydrogeology	BSc (Hons) MSc MCIWEM MIEnvSc
Chapter 12	Kerith Mc Connell	RPS	Terrestrial Noise and Vibration	BA(Mod) MSc MIEMA MIOA CEnv
Chapter 13	Stephen McAfee	RPS	Air Quality and Climate	BSc MSc MIAQM CMIES
Chapter 14	Mark Magee	RPS	Material Assets – Utilities	BA (Mod) MSc CEnv CSci CWEM CIWEM
	Conor O'Hara		Material Assets - Transport	MSc, BSc (Hons), CMILT, MCHIT
Chapter 15	Kate Robb	John Cronin & Associates	Cultural Heritage	BA, MA, PGDip EIA/SEA Mgmt, MIAI
Chapter 16	Raymond Holbeach	RPS	Landscape and Visual	BSc(Hons) MLA CMLI
Chapter 17	Ciara Devine	RPS	Waste	BSc MSc MCIWM
Chapter 18	Mark Magee	RPS	Risk of Major Accidents and Disasters	BA (Mod) MSc CEnv CSci CWEM CIWEM
Chapter 19	Mark Magee	RPS	Cumulative Effects and Environmental Interactions	BA (Mod) MSc CEnv CSci CWEM CIWEM
	Conor Sweeney			BA (Mod) MSc
Chapter 20	Mark Magee	RPS	Summary of Mitigation Measures and Conclusions	BA (Mod) MSc CEnv CSci CWEM CIWEM

1.7 Viewing and Purchasing of the EIAR

The EIAR is available to view and download at the following dedicated https://countydonegalfrs.ie/burnfootfrs/

The EIAR can be inspected free of charge or purchased on payment of a specified fee (which shall not exceed the reasonable cost of making such copy) during public opening hours at the offices of Coimisiún Pleanála and Donegal County Council.

The EIAR can be viewed at the reception of the Donegal County House, The Diamond, Lifford, Co. Donegal during normal working hours. A computer and screen has also been made available with appropriate search facilities. Hard copies and e-copies of the EIAR may also be purchased from RPS at the reasonable

cost of making such copy by phoning the following number during normal business hours, 0749161927 or by email to burnfootfrs@rpsgroup.com.