



Assessment, Research and Data Unit			
<b>To:</b>	Maritime Authorisation Unit	<b>From:</b>	Dr. Alison McCarthy Senior Marine Advisor
<b>Permitted Maritime Usage Licence Application:</b>	MUL230031		
<b>Applicant:</b>	Amazon MCS Ireland Limited		
<b>Date</b>	17 <sup>th</sup> April 2025		
<b>Title:</b>	Response to Supplementary Material submitted by the applicant on Minded to Determination and Reasons for the Conditions		

Written by:	Dr Alison McCarthy	Senior Marine Advisor, ARD	17/04/2025
Reviewed and Approved by:	John Evans	Director, ARD	17/04/2025
Issued by:	John Evans	Director	22/04/2025

**Introduction:**

I have considered the issues raised by the applicant on 16<sup>th</sup> April 2025 in their submission on the Minded to Determination Notice issued by MARA on 7<sup>th</sup> April 2025. This report sets out the amendments requested by the applicant in relation to Specific Conditions 24 and 32 in Appendix 2 of the Proposed Licence only and the recommendations from the Assessment, Research and Data (ARD) Unit following a technical examination of the submission.

**Specific Condition 24:**

The Holder shall not damage or interfere with any third party's property, infrastructure or fishing gear while conducting the Permitted Maritime Usage.

**Reason:** To minimise impact on other users of the marine environment and ensure the orderly undertaking of the proposed maritime usage.

**Applicant's response:**

The applicant has requested that the word 'knowingly' should be added to the condition so as to read '*The Holder shall not knowingly damage or interfere with...etc...*'.

**MARA Response:**

As this condition is standard across all similar maritime usage licences I do not recommend amending it in this licence. It is implied that, as part of this condition, the Holder will not intentionally or knowingly damage or interfere with any third party's property, infrastructure or fishing gear while conducting the maritime usage.

**Recommendation:**

No change to condition 24

**Specific Condition 32:****Marine Mammals**

- i) The Holder shall appoint a marine mammal observer(s) for the purposes of overseeing the Permitted Maritime Usage. The Holder shall ensure the marine mammal observer(s) shall satisfy the requirements of the most up to date national guidance. During the activity the Holder shall comply with the directions of the marine mammal observer(s).
- ii) The Holder shall implement risk control and mitigation measures for marine mammals in strict accordance with the most up to date national guidance.
- iii) The Holder shall publish the report and recording and data forms on their website within 60 days of completion of the Permitted Maritime Usage unless otherwise agreed with the Grantor.

- iv) The Holder shall, within 30 days of completion of the Permitted Maritime Usage, forward a report of the marine mammal observer(s) operations and mitigation undertaken, to [offshore@npws.gov.ie](mailto:offshore@npws.gov.ie) and [compliance@mara.gov.ie](mailto:compliance@mara.gov.ie).

**Reason:** To ensure the protection of the marine environment and protected species.

**Applicant's response:**

The applicant has requested that the requirement for publishing the marine mammal reports on their website be removed from the condition. The applicant has noted that they do not have a website that would be suitable to publish such a report.

**MARA Response:**

Part (iii) of this condition is to allow members of the public to view the marine mammal monitoring reports. Scope is provided in the condition for the licence holder to agree an alternative arrangement to the publication of marine mammal reports with MARA's Compliance and Enforcement Team. Consideration should be given by the applicant to a suitable alternative means of making the information publicly available. Thus I do not recommend amending this part of the condition in the licence.

**Recommendation:**

No change to condition 32

  
**Dr Alison McCarthy**

Senior Marine Advisor

Assessment, Research and Data Unit

17/04/2025