



20th June 2025

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**RE: Eirgrid plc.**

**For marine site investigation works to inform the engineering design and environmental assessments for two offshore substations in the Tonn Nua Area A (as identified in the South Coast Designated Maritime Area Plan), potential offshore transmission cable corridors, approaches to seven potential landfall zones, and seven landfall zones.**

A Chara,

The Marine Divisions of the Department of Agriculture, Food, and the Marine (DAFM) welcome the opportunity to provide comments to the Marine Area Regulatory Authority (MARA) on the Licence Application MUL240036 Reference no MUL240036 Title of Application MUL240036 – Eirgrid plc.

The Department of Agriculture, Food and the Marine (DAFM) wishes to stress that commercial sea fishing and aquaculture are long standing, pre-existing and traditional activities in the marine environment. Fishers and aquaculture site holders are primary food producers dependent upon certain marine areas; with the area covered by EirGrid's application (under MUL240036) being of considerable importance for such food production. This primary production is also essential to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities. The significance of such food production activity is reflected in the Government's [Food Vision 2030](#) policy.

There are a number of commercially important fisheries, which include Crab, Lobster and Scallop, located within the proposed area for site investigations. According to BIM's Business of Seafood 2024, in overall terms, crab landings were valued at €20 million, lobster landings at €13 million, and scallop landings accounted for €6 million in value terms for 2024. These examples can assist in demonstrating the sector's socio-economic reliance on such an important fishing area.

The application does not appear to take full account of the significant fishing activity in the area by inshore vessels, particularly in terms of potting activities. However, it is acknowledged that Vessel Monitoring Systems (VMS) data can be limited in this regard as the majority of vessels in the inshore fishing segment (less than 12 metres in length) are not currently required to carry such VMS systems. BIM has been working to address data gaps for such vessels in the South Coast DMAP through a participatory mapping project. The project results show extensive inshore fishing operations within the South Coast DMAP. The proposed investigation works, and survey activities are likely to cause disruption to these fishing activities, potentially requiring gears to be moved during surveying, which may lead to displacement onto other grounds, increasing effort and competition for space. Fishing and

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aquaculture activities in the area should be fully recognised and factored into site investigation plans and surveys in order to avoid, minimise and mitigate adverse impacts on the seafood sector.

Inshore and offshore fisheries may also be impacted by the increase in vessel activities associated with the proposed investigations. The referenced Fisheries Liaison Officer (FLO) would need to ensure that all relevant stakeholders are in receipt of the applicable marine notices and are aware of any proposed site investigation works at the earliest opportunity. DAFM requests that sufficient prior notice is given in advance of any such works to ensure the optimum coordination of activities and to limit potential disturbances to fishing and aquaculture activities.

To inform the DAFM comments, the observations of the Marine Institute (MI), the Sea Fisheries Protection Authority (SFPA) and Bord Iascaigh Mhara (BIM) were requested.

### **Marine Institute Feedback**

The MI observed that two major fishing harbours fall within the MUL area, namely Ballycotton Harbour in Co. Cork and Dunmore East in Co. Waterford, with Dunmore East being one of the six state owned Fishery Harbour Centres (FHC) and having significant figures for fish landings, according to the latest available figures from the SFPA.<sup>1</sup> Other fishing harbours are in close proximity including Cork City Quays, Tivoli, Ringaskiddy and Cobh, Crosshaven, Duncannon and Helvick Harbour and Youghal. MI also comment that some access restrictions, including fishing operations, are likely to result in order for SIs to be undertaken safely.

The MI observed that there are a number of aquaculture sites within the licence application area but that the application indicates that, given the nature of Site Investigations and their location, there will be no effect on aquaculture, noting the application also stating geophysical and geotechnical investigations may result in some disruption to fishing activities. The MI agrees with this conclusion given the location of the 7 potential landfall sites and site investigations likely to occur in such intertidal areas. However, given the fluid nature of aquaculture licencing, it is advised that MARA confirm the exact location of licenced aquaculture sites prior to making a determination.

In relation to cumulative effects with other activities, the MI wish to draw MARA's attention to Natura assessments, and to consider interactions between Natura qualifying interests and aquaculture operations (existing and proposed) that have been carried out nationally and, more specifically, in areas adjacent to the proposed application area. Furthermore, the MI draws MARA's attention to fishery risk assessments relating to Natura Qualifying interests that have been carried out nationally and more specifically, on the south and west coasts.

It is advised that Eirgrid plc. identify any similar geophysical/geotechnical surveys that may have been carried out in the vicinity in recent years to avoid unnecessary duplication or repetition. The MI advise that acoustic surveys avoid spawning periods to minimise impacts

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<sup>1</sup> Source: SFPA - [2023 Annual Statistics](#)



and state that in Furthermore, in light of the intensive nature of the methodologies proposed, it would be important to consider the cumulative effects of these activities in light of the location and timing of similar activities along the southeast coast (and other sites more further afield) and consider the likely longer term effects on commercial and non-commercial fish and shellfish species, other biota and the broader marine ecosystem, if any, and how these effects might be measured?

The MI recommends that, for this and other such applications, evaluations are reviewed in a wider context of marine planning for Irish waters. Such planning should be supported by predefined Cumulative Effects Assessment – potentially state-led – reviewing all relevant pressures and ecosystem components (sea and land-based).

#### **Bord Iascaigh Mhara Feedback**

BIM observed there are significant amounts of inshore fishing activity in the proposed survey areas, primarily static gears for a range of shellfish species and that survey activities could potentially disrupt some of these activities requiring gears to be moved during surveying, which may lead to displacement onto other grounds, increasing effort and competition for space.

Site investigation works may also disrupt fishing and/or catch rates due to sediment disturbance and noise which may affect catch rates in these fisheries.

In relation to aquaculture BIM notes that the application overlaps with all aquaculture licences and shellfish waters in Bannow Bay and has a partial overlap with those in Waterford Harbour and requests that the application be adjusted so as not to overlap with any aquaculture sites or shellfish waters. BIM acknowledge that no issues exist with the application boundaries in Dungarvan Harbour or Ballymacoda Bay.

BIM request that where any sediment generating activities are undertaken close to the mouth of Waterford harbour that they are done on an ebbing tide when water is exiting the harbour. Equally if the activity will generate a large acoustic sound in the water near Waterford Harbour that it is done at low tide when oysters are not covered by seawater.

#### **Sea Fisheries Protection Authority Feedback**

The SFPA observe that the application area of MUL 240036 is actively fished for Shrimp from the months August – October and for Lobster, Crab during the months of April – October.

The area is also highly utilised by the fishing industry year-round for Prawns and demersal fisheries, with an important wild Scallop fishery in the eastern section of this licence area.

There is also a high degree of risk to spawning fish aggregations occurring during the survey and development of larval fishes such as Sprat and Herring that spawn in Waterford estuary during November to January. These planktonic fishes develop and recruit into areas defined by this



survey and impacts from noise and sediment distribution may cause an adverse effect on spawning and juvenile fish stocks in the post survey years.

It is believed that such survey activities will negatively impact on existing fisheries as the identified means of conducting both Geotechnical and Geophysical surveys could significantly disrupt the existing crustacean fisheries from such benthic disturbances either through boomers or chirpers used for sub bottom profiling.

The MUL area is within important fisheries areas and fish spawning and nursery grounds. It is also believed that such Geotechnical and Geophysical surveys will also cause disturbance to the existing demersal fisheries for the duration of the survey works.

It is also believed by the SFPA, that benthic disturbances, specifically from those required for Geotechnical and geophysical surveys conducted close by or adjacent to the above classified bivalve mollusc production areas could pose a deleterious effect on the microbiological quality of both Oysters and Clams.

## **Conclusion**

DAFM recognises that the applicant's aim is to promote co-existence and minimise potential disruption to commercial fishing activities in the area. The evaluation of potential impacts of the proposed activity on commercial sea fishing activities needs to be given consideration within the context of the requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework. (NMPF).

The principles in the NMPF, in order of preference, of avoiding, minimising, or mitigating impacts on access to existing activities (including specific policies on Fisheries and Aquaculture) should be followed and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas and must demonstrate how avoidance of significant adverse impacts is considered as the preferred option.

DAFM notes that where surveys may traverse traditional fishing grounds, Fisheries liaison and consultation with local stakeholders will be undertaken prior to and throughout the works and acknowledges that a Fishery Liaison Officer (FLO) has been appointed and has been engaging with local communities, stakeholder and in particular the fisheries and seafood sector.

Particular attention is drawn to the observations from the SFPA that the area encompasses a number of live bivalve mollusc production areas classified in accordance with Commission Implementing Regulation (EU) 2019/627 for the commercial harvesting of oysters and clams for human consumption, and that there is the potential for negative impacts on these classified production areas due to benthic disturbances and possible chemical contamination. The Marine Institute has also provided observations, which warrant due consideration, and importantly, highlighting the position that acoustic surveys should avoid spawning periods in order to minimise impacts. The role of the FLO in communicating with all the relevant stakeholders would be crucial in this regard.



DAFM would urge that early and ongoing consultation with the fishing industry continues to ensure minimum impacts on the seafood industry. All relevant fishing organisations should receive any applicable Marine Notice/s, and be made aware of any proposed site survey and investigation works, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities, aquaculture sites and spawning grounds to the greatest extent possible.

Please find attached reports from the MI, BIM and the SFPA which provide further detail on the comments above for consideration.

Yours sincerely,

**Marine Divisions**  
**An Roinn Talmhaíochta, Bia agus Mara**  
Department of Agriculture, Food, and the Marine