

Aquaculture & Foreshore Application Observations

Applicant Name & Area: EirGrid PLC – Tonn Nua Area A South Coast DMAP.	Application No: MUL240036
Application Category	
<input type="checkbox"/> Aquaculture Licence <input type="checkbox"/> Review of Aquaculture Licence <input type="checkbox"/> Renewal of Aquaculture Licence	<input checked="" type="checkbox"/> Foreshore Licence <input type="checkbox"/> Trial Licence

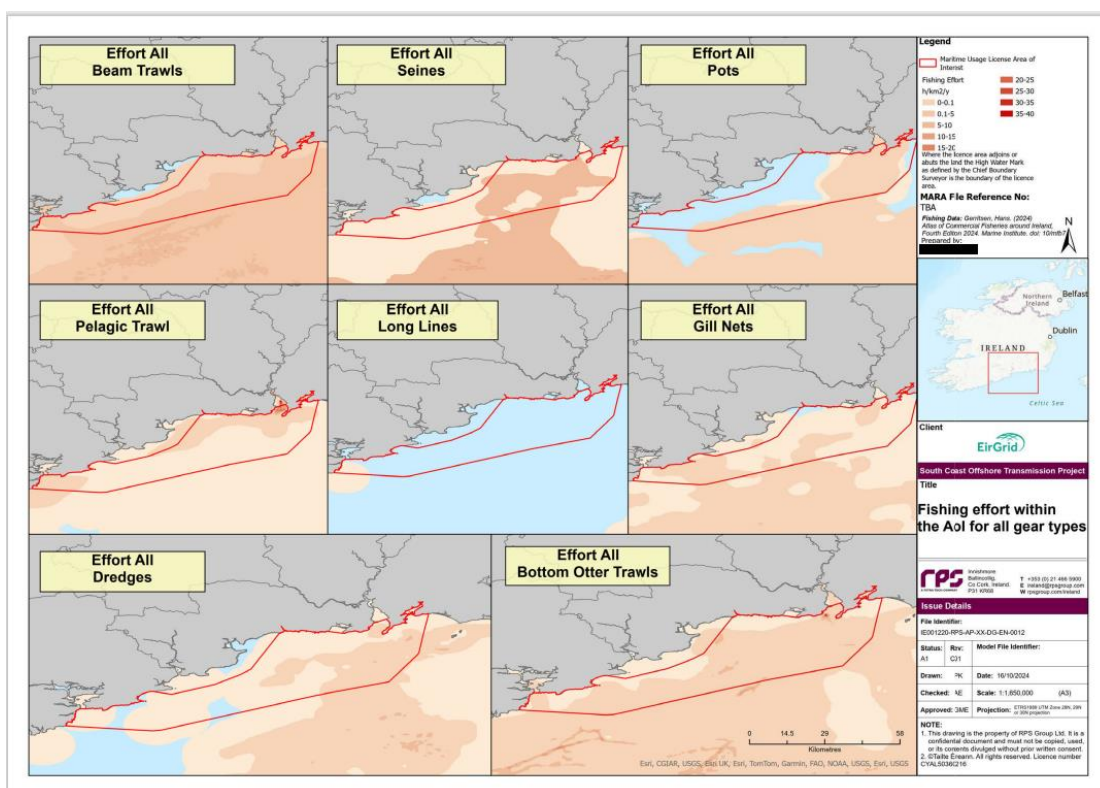
Sea Fisheries Protection Officer Observations																								
<p>1. <i>Possible impacts, if any, on existing wild fisheries in the area, with an emphasis on the possible implications for the SFPA conducting official controls and possible non-compliance issues that could arise.</i></p> <p>Foreshore Licence application MUL240036 by Eirgrid is for Site Investigation works to inform engineering and environmental assessments for two offshore Wind Substations in the Tonn Nua Area A of the South Coast Designated Maritime Area Plan located off the Southwest Waterford Coast.</p> <p>The proposed licence duration is five years from April 2025 – April 2030. The location of the Maritime Usage is off the Cork, Waterford and Wexford coasts extending from Reanies Point County Cork to Cullenstown Co Wexford.</p> <p>Outlined in the application are a series of marine and coastal Geophysical surveys, land based below HWM and from survey vessels for marine. and Geotechnical surveys conducted from survey vessels at sea and from Jack Up Barges in shallower waters on the approaches to seven potential land fall zones for the offshore transmission cables.</p> <p>The seven potential land fall zones are:</p> <table border="1"> <thead> <tr> <th>Landfall Zone</th> <th>Nearest Townlands</th> <th>County</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Ballintra West, Ballintra East, Inch, Lahard</td> <td>Cork</td> </tr> <tr> <td>B</td> <td>Ballybrangan, Ballycroneen West, Ballyrobin South</td> <td>Cork</td> </tr> <tr> <td>C</td> <td>Garryvoe Lower, Ballybutler, Ballycrenane</td> <td>Cork</td> </tr> <tr> <td>D</td> <td>Templeyvrick, Ballynasissala, Bunmahon, Ballynagigla, Knockmahon</td> <td>Waterford</td> </tr> <tr> <td>E</td> <td>Ramstown, Carnivan</td> <td>Wexford</td> </tr> <tr> <td>F</td> <td>Bannow</td> <td>Wexford</td> </tr> <tr> <td>G</td> <td>Haggard, Blackhall, Ballymadder</td> <td>Wexford</td> </tr> </tbody> </table>	Landfall Zone	Nearest Townlands	County	A	Ballintra West, Ballintra East, Inch, Lahard	Cork	B	Ballybrangan, Ballycroneen West, Ballyrobin South	Cork	C	Garryvoe Lower, Ballybutler, Ballycrenane	Cork	D	Templeyvrick, Ballynasissala, Bunmahon, Ballynagigla, Knockmahon	Waterford	E	Ramstown, Carnivan	Wexford	F	Bannow	Wexford	G	Haggard, Blackhall, Ballymadder	Wexford
Landfall Zone	Nearest Townlands	County																						
A	Ballintra West, Ballintra East, Inch, Lahard	Cork																						
B	Ballybrangan, Ballycroneen West, Ballyrobin South	Cork																						
C	Garryvoe Lower, Ballybutler, Ballycrenane	Cork																						
D	Templeyvrick, Ballynasissala, Bunmahon, Ballynagigla, Knockmahon	Waterford																						
E	Ramstown, Carnivan	Wexford																						
F	Bannow	Wexford																						
G	Haggard, Blackhall, Ballymadder	Wexford																						

The location of the Maritime Usage associated with application MUL 240036 off the Cork, Waterford and Wexford coasts extending from Reanies Point County Cork to Cullenstown Co Wexford, is actively fished for Shrimp from the months August – October and for lobster, Crab (Brown, Spider, Velvet) during the months of April – October. The area is also highly utilized 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 (Nov-Jan) these planktonic fishes develop and recruit into areas defined by this survey. 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 and 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.

In referencing the below image taken from the “Project Description”. I would caution that the effort map for potting is not accurate. The near shore area between Youghal bay and Bannow bay would have a high density of potting activity from March to October. Primarily from under 10m vessels that don't transmit tracking data. These works and their exclusion zones will significantly impact inshore potting activities.





2. *Impacts, if any, on shellfish growing areas adjacent to or within the area and the possible impact on the ability of the SFPA to conduct official controls and possible non-compliance issues that could arise.*

Foreshore Licence application MUL240036 by Eirgrid is for Site Investigation works to inform engineering and environmental assessments for two offshore Wind Substations in the Tonn Nua Area A of the South Coast Designated Maritime Area Plan located off the Southwest Waterford Coast. The location of the Maritime Usage is off the Cork, Waterford and Wexford coasts extending from Reanies Point County Cork to Cullenstown Co Wexford.

This 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.

These production areas include:

Harrylock bay located in the approaches to Waterford Harbour, classified for Clams, Bannow bay, classified for Oysters and Ballyteigue Bay, also classified for Oysters.

It is believed by 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.

3. *Possible impacts, if any, on seafood safety.*

Foreshore Licence application MUL240036 by Eirgrid is for Site Investigation works to inform engineering and environmental assessments for two offshore Wind Substations in the Tonn Nua Area A of the South Coast Designated Maritime Area Plan located off the Southwest Waterford Coast. The location of the Maritime Usage is off the Cork, Waterford and Wexford coasts extending from Reanies Point County Cork to Cullenstown Co Wexford.

This 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. These production areas include:

Harrylock bay located in the approaches to Waterford Harbour, classified for Clams, Bannow bay, classified for Oysters and Ballyteigue Bay, also classified for Oysters.

It is believed by 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 and quality of both Oysters and Clams. There is also a risk of chemical contamination from an unknown source being agitated and resuspended within the water column. Tidal movements could potentially convey contamination to Classified production areas for shellfish.

Food safety Legislation, specifically Regulation (EC) 853/2004 Annex III prescribe measures for Food Business Operators to follow to mitigate Microbiological contamination of Live Bivalve Molluscs (LBMs).



Harrylock Bay is A classified for the commercial harvesting of Surf Clams for Human consumption and does not require microbiological mitigating measures before placing on the market for human consumption. In the case of B classified LBMs such measures include depuration which purify B class LBMs to A class where there are then fit for direct human consumption.

Oysters for which Bannow Bay and Ballyteigue Bay are B classified are either eaten raw or lightly cooked and microbiological contamination of Oysters is a high risk for public health.

The depuration process, as described, is limited to the maximum *E.coli* levels of 4600 MPN *E.coli* /100grams shellfish flesh and intravalvular fluid, and may NOT be used to purify LBMs with higher *E.coli* levels.

4600 MPN *E.coli* /100grams is the maximum permitted *E.coli* levels for B classification. Any additional microbiological contamination caused by benthic disturbances, specifically from those required for Geotechnical and Geophysical surveys could pose a deleterious effect on the microbiological quality of both Oysters and Clams and may exceed the maximum permissible levels for microbiological mitigation through depuration.

Sea-Fisheries Protection Authority:
Clonakilty Port Office
Dunmore East Port Office

Date: 29/05/2025