

Submission of the South East Regional Inshore Fisheries Forum (SE RIFF) on –

MUL240036 - Marine usage Licence consultation for EIRGRID to carry out site investigation (SI) Works at landfall associated with the South Coast DMAP

The SE RIFF is concerned about the impact of the surveys to the members of inshore fishing fleet that will face potentially significant disruption, and longer term impacts by some of the survey techniques on catch rates.

The requirement to relocate gear or avoid certain areas for extended periods will cause losses in income, which can be exacerbated by poor weather or vessel availability prolonging these disruptions.

Fishermen in some areas have already in recent times faced disruption over a multiannual period such as the recent Greenlink Interconnector project between Wales and Ireland, which caused disruption to fishing in the Hook Head area, particularly around Baginbun—a site also under consideration in this application.

Of greater concern are specific survey techniques associated with Offshore Renewable Energy (ORE) developments, such as the use of Sub-bottom Profilers (SBP), Ultra-High Resolution Seismic (UHRs) surveys, borehole investigations, and Vibrocore testing.

Fishermen have heard reported adverse effects from previous projects involving these techniques. In particular, crustacean and whelk stocks have been observed to relocate from key fishing areas and, in some cases, have not returned, resulting in long-term impacts on livelihoods.

The impact of underwater noise and vibration during construction, and electromagnetic fields (EMF) from subsea cables during operation are of considerable concern.

Fishing activity within the proposed survey area is significant, particularly among the inshore fleet operating vessels under 12 metres in length, which are not required to carry Vessel Monitoring Systems (VMS). BIM conducted a voluntary participatory mapping project in 2024 with the inshore fleet operating within the DMAP South area. There are close to 100 active vessels under 12 metres fishing from ports in Wexford and Waterford. Of these, over 70% were surveyed, with more fishermen from east Co. Cork ports. A presentation of the findings was made to representatives of EirGrid during a meeting of the SE RIFF, held in Wexford on 27th of November 2024, where it was stated as has always been the position made public by the SE RIFF, that all ORE development should be outside of the 12 nautical mile limit. This is still our position.

The results of this project clearly illustrates the resulting fishing effort distribution within the 12 NM zone, highlighting extensive pot fishing activity within the Tonn Nua site, with high concentrations of in particular potting for lobster, crab and shrimp along the Waterford and South Wexford coastal area. These are particularly in areas overlapping with potential landfall zones for cables associated with EirGrid's substations.

We have studied the application documentation, such as Section 8 of the “Powering Up Offshore South Coast – Assessments of Impact on the Maritime Usage (AIMU). Of concern is the omission of all local commercial fishing harbours and small piers within and adjacent to the Aol. In County Wexford, from the eastern extent of the Aol, relevant harbours include Fethard and Slade (Hook Peninsula), Duncannon, and Ballyhack. Though Duncannon and Ballyhack lie just north of the Aol, vessels based there operate within it. In County Waterford, relevant harbours include Passage East, Cheekpoint (also just north of the Aol), Dunmore East, Tramore,

Dunabrattin/Boatstrand, Stradbally, and Helvick, Ardmore, and Ferrypoint (near Youghal), all of which support fishing operations within the Aol.

"Pot fishing effort is noted across the Aol mainly to the east off Hook Head, in the Waterford Estuary and along its southern boundary further offshore. Effort was low in these areas with little effort to the north or west of the Aol." We dispute this as the results of the BIM mapping study show otherwise with extensive fishing activity throughout the Aol.

The AIMU outlines mitigation measures and states that:

"With the inclusion of the above best practice methods and mitigation measures, the impact on Fisheries and Aquaculture from the proposed activities will be reduced to non-significant levels,"

We are concerned that this will not be the case as the experience and perspectives of local fishers indicate a need for greater recognition of the real and potential impacts on commercial fishing activity, both inshore and offshore, within the Aol.

It is vital there is full and timely consultation with all fishers and other aspects of the seafood industry such as onshore processing, and other ancillary industries such as marine tourism and environmental interests at all stages of the works being proposed and adequate measures put in place to address losses suffered by the industry. It is essential that independent evaluation of the true impact on the seafood and related sectors is undertaken and faced up to.