

Assessment, Research and Data Unit
Maritime Usage Licence Assessment Report

To:	Maritime Authorisations Unit	From:	Dr Ciar O'Toole Senior Marine Advisor
Date	30 September 2025	Maritime Usage Licence Application No:	MUL240001
Approved for issue by:	Laura Brien, CEO		
Applicant:	Woodrow Sustainable Solutions Ltd. (APEM Ireland), Upper Offices, Ballisodare Centre, Station Road Ballisodare, Co. Sligo		
Type of maritime usage in accordance with Schedule 7 of the Maritime Area Planning Act, 2021 (as amended):	<i>3. Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000.</i>		
Location of proposed Maritime Usage:	Great Blasket Island, Blasket Sound, Co. Kerry		
Licence application received:	25/04/2024		
Requests for further information:	09/07/2024, 06/02/2025		
Responses to requests for information received:	19/07/2024, 04/03/2025		
Stage 2 Appropriate Assessment required:	Stage 2 AA not required. Screening determination made 08/09/2025	Natura Impact Statement received:	Not Applicable
Environmental Impact Assessment considered:	02/12/2024		
Public consultation:	Not Applicable		
Submissions from the public received:	Not Applicable		
Public body consultation:	25/08/2025 to 24/09/2025, six submissions received.		

1. Background

The applicant applied to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence (MUL) on 25/04/2024 under the Maritime Area Planning Act 2021 as amended (the MAP Act), to undertake marine environmental surveys for the purposes of site investigation. The proposed maritime usage activity would consist of deployment of four temporary static passive acoustic monitoring devices, the carrying out of intertidal and subtidal surveys, grey seal counts and boat-based surveys at Great Blasket Island, Blasket Sound, Co. Kerry.

The work planned for this proposed maritime usage includes the following:

- Deployment of static passive acoustic monitoring (PAM) devices – 4 devices on fixed moorings, maintenance to occur every 2-3 months.
- Intertidal surveys - <1 km of coastline along 3 transects using a Phase II Quantitative Intertidal transect survey, as detailed in the applicants SISAA report which is expected to take four days in total.
- Subtidal surveys – using drop down video (DDV) or camera surveying to determine the presence of subtidal reefs. Dive surveys will be conducted in areas not suitable for the DDV equipment. Expected to take six days in total.
- Grey seal counts and human disturbance monitoring – survey over six days in total with one survey day per month between April and September and any disturbance monitored.
- Boat based surveys – to determine the species of marine mammals and their occurrence and disturbance within the survey area. The aim will be to undertake six surveys over a total of six days, and each survey will coincide with deployment, recovery, and maintenance of the PAM devices to minimise vessel presence within the survey area.

The study area is located in the Blasket Sound around the Great Blasket island in Co. Kerry and the indicative area is 4956.12 hectares. It consists of a number of habitat types including vegetated sea cliffs and reefs in some of the offshore areas. The water depth ranges from zero in the intertidal to around 50m offshore. The intertidal areas include soft sediment habitat on the beach and rocky shore. Proposed survey areas are indicated in Figure 1. It is envisaged that the works would be conducted over a one-year period. The licence period assessed here is two years.

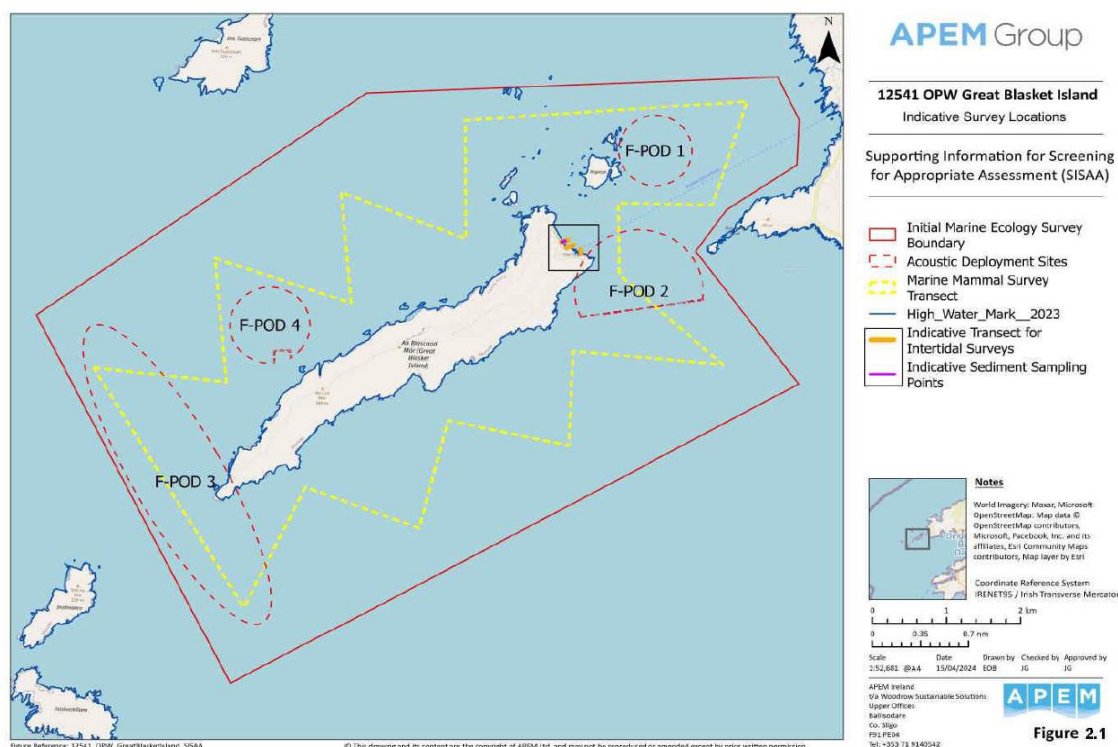


Figure 1: Map showing proposed Maritime Usage Area (solid red line) and locations of proposed maritime usage activities.

2 National Policy and EU Directives

In undertaking the assessment of this licence application MARA had regard to the requirements of Section 6(8), the Marine Policy Planning Statement, and Section 121(2) of the Maritime Area Planning Act, 2021, as amended, which sets out the marine policy and legislation to which regard must be had in considering a licence application.

2.1 National Marine Planning Framework (NMPF)

The Marine Planning Policy Statement (MPPS) outlines the government's overarching vision, policies, and principles for managing the country's maritime area. The National Marine Planning Framework (NMPF) sets the framework for implementing the forward planning component of our marine planning system as set out in the MPPS. The proposed maritime usage activities are consistent with the NMPF policy in two of the overarching marine planning policies: Environmental and Economic, particularly Chapter 6 Economy whose objectives include maintaining and developing relevant infrastructure. A number of environmental policies detailed in the NMPF are covered in other sections of this report, including, but not limited to, the National Biodiversity Action Plan (NBAP), the Birds and Habitat Directives, the Water Framework Directive, and the Marine Strategy Framework Directive (MSFD) and Climate Change.

2.2 National Biodiversity Action Plan (NBAP)

Ireland's [4th National Biodiversity Action Plan](#) sets the national biodiversity agenda for the period 2023–2030. The objectives of the NBAP focus on the conservation and restoration of biodiversity. Objective 2 of the NBAP is to meet urgent conservation and restoration needs. Part of its focus is to elevate efforts to tackle invasive alien species. It is recommended that a condition be included in the licence, if granted, to address the potential risks from invasive alien species as a result of the survey activities.

2.3 Birds and Habitats Directives (79/409/EC and 92/43/EEC)

MARA issued an Appropriate Assessment (AA) Screening Determination, dated 08/09/2025 which concluded that the proposed site investigation activities will not require Stage 2 AA as it could be excluded, on the basis of objective scientific information, that the proposed project, either individually, or in-combination with other plans or projects, will have a significant effect on European sites.

Articles 12 and 13 of the Habitats Directive impose obligations on Member States to establish a system of strict protection for animal and plant species listed on Annex IV of the Directive. The applicant submitted a Risk Assessment for Annex IV Species in support of their MUL application. The risk assessment considered the scope of the proposed site investigation activities, the relevant Annex IV species (bats, otters, cetaceans and turtles) and the potential impacts of the activities on those species. The Risk Assessment for Annex IV Species concluded that the proposed activities will not disturb Annex IV species, a conclusion I concur with. The applicant finds that a derogation licence in relation to Annex IV species is not required for this proposed maritime usage.

2.5 Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) requires EU member states to protect and improve water quality in all waters to achieve at least Good Status in inland surface waters, transitional waters, coastal waters and groundwater by 2027, at the latest. There is one coastal waterbody within the MUL application area, known as the South Western Atlantic Seaboard waterbody, which was classified as having High status in the most recent [Water Quality in Ireland 2016-2021](#) assessment. Furthermore, the waterbody is classed as not at risk of failing to meet the objectives of the WFD by 2027.

The status of coastal waterbodies is based on the assessment of biological quality elements (phytoplankton, benthic invertebrates, macroalgae, angiosperms) as well as supporting chemical (specific pollutants), physico-chemical (e.g. temperature, salinity, nutrients) and hydromorphological quality elements. Given the type and scale of these activities, there is minimal potential for water quality impacts due to this proposed maritime usage. It is not

expected that the proposed maritime usage will have any impact on the existing High status of the waterbody listed above.

2.6 Environmental Impact Assessment Directive (2014/52/EU) (EIA Directive)

MARA carried out a preliminary EIA screening of the proposed activities having considered Schedules 5 and 7 of the Planning and Development Regulations 2001 ('PDR'). A 'Consideration of EIA Form' was issued by MARA on 20/12/2024 and it was concluded that the project does not fall within the scope of the EIA Directive and therefore an environmental impact assessment is not required. The conclusion was reached as the proposed activities are not listed on Part 1 of Schedule 5 of the PDR. In addition, the proposed activities are not listed on Part 2 of Schedule 5 of the PDR, in relation to projects with specific thresholds above which require EIA and below which require consideration of the criteria listed in Schedule 7 of the PDR (i.e. characteristics and location of proposed development and characteristics of potential impacts).

2.7 Marine Strategy Framework Directive (2008/56/EC)

The Marine Strategy Framework Directive (MSFD) sets the framework for European marine environmental policy. It aims to achieve Good Environmental Status (GES) for all marine waters in Europe and protect the resource base for marine related economic and social activities. The 2024 draft assessment under Article 8 of the MSFD¹ states that GES has not been achieved for sea-floor integrity, marine litter and biodiversity. Table 1 provides an assessment of the impacts of the proposed activities on the MSFD descriptors relevant to this application.

Table 1: Assessment of impact of proposed activities on MSFD descriptors

MFSD Descriptor	Good Environmental Status achieved²	Assessment
Biological diversity	Partially achieved	As discussed in Section 2.3, MARA has undertaken an AA screening in respect to the proposed maritime usage activities which found no impact on protected species or habitats. The applicant also carried out an Annex IV risk assessment that found no likelihood of impact on those protected species.
Non-indigenous species	Yes	To ensure that the proposed maritime usage activities will not result in the unintended introduction of non-indigenous species, it is recommended that a condition be included in

¹ [Ireland's Draft Marine Strategy Part 1: Article 8, 9 and 10 report 2024.](#)

² As per [Ireland's Draft Marine Strategy Part 1: Article 8, 9 and 10 report 2024](#)

		the licence, if granted, relating to the control of invasive species.
Population of commercial fish/shellfish	Partially achieved	Aquaculture/Fisheries Orders: There are no aquaculture sites or fishery order areas in the immediate vicinity of the proposed maritime usage. The nearest aquaculture site is in Ventry Harbour and will not be impacted by the proposed maritime usage due to the distance involved and the nature and scale of activities. Commercial Fisheries: There are some fishing activities in the proposed maritime usage areas. This topic is considered further in Section 3.
Marine food webs	Unclear	The balance and diversity in marine food webs is not expected be impacted as a result of the proposed activity.
Eutrophication	Yes	The proposed activity does not involve the addition of nutrients to the marine environment and as such will not impact this descriptor achieving GES. See Section 2.5 on the WFD for further discussion on water quality.
Sea floor integrity	No	The benthic environment will experience very small and temporary disturbance due to some of the methods proposed by this maritime usage activity. Overall, it is not expected that the activities will negatively impact on the GES status of this descriptor.
Alteration of hydrographical conditions	Yes	The proposed activities will not significantly alter the hydrographical conditions (e.g. changes in wave action, currents, salinity, temperature) in the proposed MUL area. There will be no impact on the GES status of this descriptor.
Concentrations of contaminants	Yes	The licence, if granted, will require inclusion of a condition relating to preparation of an oil pollution emergency plan to mitigate for any accidental introduction of contaminants to the marine environment for vessels used in this proposed MUL activity. Given the nature and duration of the activities proposed, it is not expected that the activities will negatively impact on the GES status of this descriptor.
Contaminants in fish/seafood for human consumption	Yes	The proposed MUL activity will not result in the introduction of contaminants in fish or seafood and therefore, will not impact on the GES status of this descriptor.
Marine Litter	No	The proposed activities will not result in the introduction of marine litter to the marine environment and thus will not impact on the achievement of GES status of this descriptor.

Introduction of energy including underwater noise	Yes	The proposed activities will not result in the introduction of significant levels of underwater noise or other forms of energy into the marine environment and thus will not impact on the achievement of GES status of this descriptor.
---	-----	--

2.8 Climate Action and Low Carbon Development Act 2015 ('the Climate Act')

Considering the temporary and short-term nature of the proposed maritime usage activities, no significant increases in carbon emissions are expected to be produced.

3. Consideration of other maritime users

MARA has had regard to the rights of other users as set out in Section 3 (3)(b) of the MAP Act. Potential impacts on commercial fishers and recreational users of the maritime area, including the intertidal have been assessed. There will be very minimal disturbance to recreational users.

There is a small possibility of overlap between the proposed site investigation activities and smaller commercial fishing vessels, particularly those carrying out potting activities for crustacean species in the area. However, as the activities are short term and temporary in nature, this is not considered significant. It is recommended to include a condition in any licence granted that the holder not damage or interfere with any third party's property, infrastructure or fishing gear while carrying out the Permitted Maritime Usage.

4. Site visit

No site visit was carried out for this assessment, given the short term and temporary nature of the proposed activity.

5. Public consultation

Public consultation was not undertaken on this application as screening for appropriate assessment, by MARA, under regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011), determined that Stage 2 appropriate assessment was not required in this instance.

6. Public bodies consultation

MARA engaged in a non-statutory consultation seeking observations from relevant public bodies in respect of the proposed maritime usage. Six observations were received from these bodies. The submissions received are summarised below. The MARA website should be consulted for details of the full submissions.

Public Body Submission 1: Geological Survey Ireland (GSI)

Submission summary

GSI highlights some possibly relevant data sources for the GSI and also requested a copy of any reports detailing the site investigations carried out if they go ahead. This data request specifically relates to borehole data.

MARAs response:

MARA notes the submission from the GSI. MARA notes that the GSI's data request specifically relates to borehole data, an activity not proposed as part of this maritime usage application.

Public Body Submission 2: Department of Agriculture, Food and the Marine (DAFM)

Submission summary

Refers to comments they received on this application from the Marine Institute and Bord Iascaigh Mhara in relation to this application and states both agencies noted minimal to no impact on the fishing sector. DAFM requested that the activity be subject to a Marine Notice.

MARAs response:

MARA notes the content of the submission from DAFM. They recommend that a condition be included in any licence issued requiring that the applicant issues a Marine Notice before activities commence. This is covered in the proposed maritime usage licence conditions in Appendix 1.

Public Body Submission 3: Marine Survey Office (MSO), Department of Transport

Submission summary

The MSO has no objection to the proposed maritime usage. The submission recommends conditions to be applied to the licence if granted, which relate to navigation safety, the need for vessels to be suitably certified, the requirement for a marine notice to be issued, the requirement for Navtex broadcasts, the need to liaise with the MSO and Commissioners for Irish Lights regarding the marking and lighting of any moored instruments.

MARAs response:

MARA notes the issues raised by the MSO. Conditions are included as standard in Marine Usage Licences in respect of the requirement to publish marine notices and the need for vessels to conform with the requirements of Irish certification standards. In addition, MARA is required to have regard to the rights of the public or any class of the public over the foreshore in relation to navigation and this requirement has been incorporated into our overall assessment of the licence application.

Public Body Submission 4: Marine Institute (MI)

Submission summary

The MI also made an additional submission agreeing with the AA screening conclusion and making a general comment regarding keeping survey time as short as possible to minimise time visible to Grey seal.

MARAs response:

MARA notes the submission from the MI. The general comment made regarding minimizing disturbance time to Grey seal has been considered as part of the AA screening and is discussed in the applicants submissions as part of their application.

Public Body Submission 5: Commissioner of Irish Lights

Submission summary

Has no concerns relating to the proposed maritime usage activity. Raises one point relating to the marking and lighting of possible structures in the maritime area

MARAs response:

MARA notes the submission, and the point raised by Irish Lights. It should be noted that the requirement for statutory consents in respect of the deployment of buoys lies with the Commissioner for Irish Lights. The onus is on the applicant to ensure that all the required statutory consents are in place in order for the proposed marine usage activity to go ahead. It is recommended that a condition be included in the licence, if granted, stating that the MUL does not negate the responsibility of the applicant to ensure they have all the necessary consents to undertake the proposed activity.

Public Body Submission 6: Development Applications Unit (DAU), Department of Housing, Local Government and Heritage

Submission summary

The DAU made a submission on behalf of the Underwater Archeological Unit (UAU) of their Department which provides a list of recommendations and a number of suggested conditions to be applied to the proposed Licence if granted.

MARAs response:

MARA notes the submission of the UAU. Any licence issued to the applicant for the proposed maritime usage will require they adhere to the plans and particulars of their submitted application documents. It is recommended that the licence include a condition to consult with, and comply with the requirements of, the National Monuments Service prior to commencing the proposed maritime usage.

Recommendation

Having considered the information submitted in support of the application and my own assessment, I recommend that a Maritime Usage Licence in accordance with Section 119 of the Maritime Area Planning Act, 2021, as amended, be granted to Woodrow Sustainable Solutions Ltd. (APEM Ireland), Upper Offices, Ballisodare Centre, Station Road Ballisodare, Co. Sligo, for the purposes of undertaking marine environmental surveys, subject to the conditions in Appendix 1.



Dr Ciar O'Toole
Senior Marine Advisor
30/09/2025

Appendix 1 – Recommended Conditions

Recommended term of licence for inclusion in the *Particulars Schedule*:

1. Recommended Term of licence to be 2 years from date of commencement.

Reason: To ensure the orderly administration of licensed maritime usages in the maritime area.

Recommended conditions for inclusion in *Appendix 2: Specific Conditions of the Marine Usage Licence*, if granted.

17. The Permitted Maritime Usage shall be carried out in accordance with the plans and particulars submitted in support of the application for this Licence.

Reason: To clarify the scope of this licence and ensure protection of the marine environment.

18. Prior to the commencement of the Permitted Maritime Usage the Holder shall consult with the Underwater Archaeology Unit of the Department of Housing Local Government and Heritage, National Monuments Service, located at G37, Custom House, Custom House Quay, Dublin 1, D01 W6X0, and comply with all applicable requirements set forth by the Unit.

Reason: To ensure protection of maritime heritage.

19. The Holder shall, a minimum 14 days prior to the commencement of the Permitted Maritime Usage, arrange for the publication of a Marine Notice with the Marine Safety Policy Division, Department of Transport. This Marine Notice shall include details of the Licence Holder, and the Licence Number as granted by MARA.

Reason: To ensure safe navigation.

20. The Holder shall not damage or interfere with any third party's property while carrying out the Permitted Maritime Usage.

Reason: To minimise impact on other users of the marine environment.

21. The Holder shall ensure that all vessels engaged in this Permitted Maritime Usage conform to Irish Certification standards for vessels, as required by the Marine Survey Office.

Reason: To ensure protection of the marine environment.

22. The Holder shall demonstrate all reasonable practical measures are taken to ensure that all vessels used in the Permitted Maritime Usage are free of invasive marine species on their hulls and in their ballast water and that all vehicles and equipment used in the Permitted Maritime Usage are free of invasive marine species.

Reason: To ensure protection of the marine environment.

23. Accidental events:

The Holder shall ensure that there is an oil pollution emergency plan on-board any survey vessels. This plan should specify:

- (i) Information on the location and detail of spill response resources on-board;
- (ii) Information on crew training in relation to oil pollution response;
- (iii) How crew will interface with other site investigation operators, where applicable.

Reason: To provide appropriate controls on the Permitted Maritime Usage to ensure protection of the marine environment.

24. On completion of the activity, the Holder shall provide the United Kingdom Hydrographic Office (UKHO) at <https://ukhodataupload.admiralty.co.uk/> or sdr@UKHO.gov.uk and the INFOMAR program at support@geodata.gov.ie with the final bathymetric data from this Permitted Maritime Usage so that the appropriate charts can be updated.

Reason: To ensure the safety of navigation at sea and the protection of the marine environment through availability of monitoring data.