



September 15, 2025

To: licence@mara.gov.ie

RE: Request for Observations – MUL 240001 - APEM Group - Marine environmental survey at Blasket Sound, Co. Kerry, for survey works to be carried out including deployment of static Passive Acoustic Monitoring (PAM) devices, boat-based line transects, intertidal and subtidal surveys.

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The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the Marine usage Licence, **MUL240001**, for **APEM Group for Marine environmental survey works at Blasket Sound, Co. Kerry.**

It is essential that the sea-fishing and aquaculture sectors are fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment as the proposed activity of **MUL240001** is being evaluated.

Fishers and aquaculture site holders are primary food producers dependent upon certain marine areas which are particularly important for food production. This primary production is critical to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities. The importance of these primary and secondary food production activities is reflected in the Government's Food Vision 2030 policy.

To inform DAFM comments, observations on the application were requested from the Marine Institute (MI) and Bord Iascaigh Mhara (BIM).

The MI noted that as the proposed survey sites are located around Great Blasket Island, Co. Kerry, no impacts are expected to fishing activities, fish stocks, spawning or juvenile areas or aquaculture operations.

BIM also noted that this project will have minimal to no impact on the sector.

As reported in the application, fishing vessel traffic can surround the area in the vicinity of the Blasket Islands. Vessel Monitoring System (VMS) data regarding fishing in the area may also be limited as many of the vessels in the inshore fishing segment (less than 12 metres in length) are not currently required to carry VMS systems on board.

While this proposal is not anticipated to impact unduly on fisheries, relevant local fishing organisations should nevertheless be included on the provision of any Notices to

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Mariners in this respect, and be made aware of proposed site survey works at the earliest opportunity.

DAFM would then seek confirmation that where there are any indirect impacts on traditional fishing grounds identified, consultation with local stakeholders will be undertaken prior to and throughout the works and a Fisheries Liaison Officer (FLO) will be appointed to liaise with all the relevant sea going and foreshore users in advance of any marine survey operations.

DAFM recognises that the developer'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 survey works 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 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.

Yours sincerely,

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