



15 August 2025

licence@mara.gov.ie

RE: Request for Observations – MUL240023 - Iarnród Éireann.

A Chara,

The Marine Divisions of the Department of Agriculture, Food, and the Marine welcome the opportunity to provide comments on the Licence Application MUL240023, Reference no MUL240023, Title of Application MUL240023 – Iarnród Éireann.

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 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.

In order to inform the DAFM comments on the application, the observations of both the Marine Institute (MI) and Bord Iascaigh Mhara (BIM) were sought. The MI has noted that two fishing harbours are in close proximity to the proposed survey areas: Dun Laoghaire and Wicklow. The proposed areas overlap with spawning and nursery grounds of commercial fish species (whiting, cod, haddock, mackerel, and horse mackerel), however, the impact of the surveys on these may be expected to be minor owing to spatial and temporal range of activities.

To illustrate the value of the two harbours mentioned above to the Seafood Industry, the following figures are given as an example: In 2022 landings by Irish vessels at Dun Laoghaire were twenty-five tonnes with an estimated value of €590,000. Wicklow had 1,695 tonnes landed with an estimated value of €2,960,000. A further 742 tonnes (€6,969,000) were landed by foreign vessels at Dun Laoghaire.

Near shore fisheries, which include crab, lobster, and whelk, also occur within the proposed areas 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 whelk landings were valued at €8 million in 2024.

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The MI has recognised that the potential impacts of the proposed activities on marine biota primarily relate to physical disturbance and noise, however, with the mobility of fish and limited operational time exposure, only limited impacts should be incurred.

The MI has also noted the potential for survey data exchange across overlapping activities, which should be considered across all MUL applications to reduce repeat activities. The proposed survey dates in the application may need to be revisited (stated as April to September 2025).

Inshore and offshore fisheries may be impacted by the increase in vessel activities associated with the proposed site investigations. All relevant stakeholders should be in receipt of the applicable marine notices and be aware of any proposed site investigation works at the earliest opportunity.

DAFM seeks confirmation that a Fisheries Liaison Officer (FLO) will be appointed to liaise with all the relevant sea going and foreshore users in advance of any operations and 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.

It should be noted that Vessel Monitoring Systems (VMS) data for fishing activity by inshore vessels is limited 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.

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 fishing grounds. Fishing and 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.

The Marine Engineering Division of DAFM has no objections to the application as set out in the documents provided, however, as with all marine applications, appropriate monitoring and measures and best practice must be followed during the to ensure that the proposed survey works do not cause any direct or cumulative negative impacts on environmental sites, aquaculture and fishery harbour operations.

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.

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food, and the Marine