

Request for Observations - MUL240023 - Iarnród Éireann (Irish Rail) submitted on 17/06/2024

Jonathan White – Marine Institute – Version 1 – 31st July, 2025

Summary

Iarnród Éireann seek a MUL for survey operations along the east coast of Ireland to inform design of coastal protection measures and baseline surveys to inform environmental assessments. In summary relating to commercial fishing and aquaculture activities – the whole of the seafood sector:

- Two fishing harbours are in close proximity to the proposed survey areas: Dun Laoghaire and Wicklow
- Proposed areas overlap with spawning and nursery grounds of commercial fish species (whiting, cod, haddock, mackerel and horse mackerel) - the impact of the surveys on these may be expected to be minor owing to spatial and temporal range of activities.
- Commercial fishing activities in the areas comprise primarily whelk fishing and dredging for seed mussel.
- Recreational fishing is active in the area, which will incorporate some commercial elements from boat hire to gear and tackle sales.
- Activities are intended to be completed within one year.
- Public notice of general planned activities has been published in press – dates of activities would also need to be published.
- A Cumulative Impact Assessment is limited to proposed and agreed activities, with 11 projects flagged.
- Potential for survey data exchange across overlapping activities should be considered across all MUL applications to reduce repeat activities.
- Proposed survey dates in the application may need to be revisited (stated as April to September 2025).

Background

On the 11th of July, 2025, DAFM requested observations and comment on a Marine Usage Licences (MUL) application received by MARA from Iarnród Éireann (Irish Rail) submitted on 17/06/2024, with a response time of Friday 1st August.

Iarnród Éireann (IÉ) are proposing a Geotechnical Investigation (GI), Geophysical site investigation surveys, ecology and marine archaeology surveys (the Proposed Survey Works) to inform design options for proposed East Coast Rail Infrastructure Protection Projects (ECRIPP).

The request was for comments/observations on the impact this project might have on the whole of the seafood sector.

Observations and Comments:

- A ten year duration for the MUL is sought, with intention of Geotechnical and Geophysical works to be completed within 12 months of a MUL being granted.
- This is a commercial use.
- Work is to inform design of coastal protection measures and baseline surveys to inform environmental assessments.

- The Geotechnical Investigation (GI) and Geophysical Surveys will be completed within 12 months upon receipt of a valid MUL.
- Bathymetry, Ecology and Marine Archaeology surveys will be on a rolling basis to inform the environmental assessment. It is envisaged that up to date information will be critical due to the close proximity of European Sites to the Proposed Survey Works.
- Geotechnical & Geophysical Surveys: Maximum duration of 6 months however more likely to take one month in total.
- Ecology & Archaeology Surveys planned for April 2025 to August 2025
- Bathymetric Surveys: March to September 2025.
- The application is for multiple Licence Area locations:

Area	Location	Surveys: Foreshore & intertidal (land-based)	Intertidal & subtidal (boat-based)
A	Boosterstown	Geotechnical, geophysical, bathymetric, benthic ecology (intertidal cores and transects), metal detection	Bathymetric and sub-bottom profiling (6.4km line)
B	Blackrock		
B	Killiney	Metal detection, bathymetric, benthic ecology (intertidal transects and subtidal day-grabs)	Bathymetric and sub-bottom profiling (4.1km line)
C	Bray Head	Metal detection, bathymetric, benthic ecology (intertidal transects and subtidal day-grabs)	Bathymetric and sub-bottom profiling (5.5km line), breeding bird, drop down camera, bat, subtidal day grabs
D	Greystones	Metal detection, bathymetric, benthic ecology (intertidal transects)	Bathymetric and sub-bottom profiling (9.1 and 10.4km lines), subtidal day-grabs
	Wicklow Town		

- Surveys will be subject to weather conditions and likely that multiple rounds of ecology and archaeology surveys will be carried out each year to inform the environmental assessment.
- Consultations in relation to the Proposed Survey Works has been undertaken with: Local Authorities; private local landowners; National Parks & Wildlife Service; Dublin City Council; Dun Laoghaire-Rathdown County Council and; Wicklow County Council.
- Access to the foreshore and beach may be impacted.
- Pedestrian exclusion zones within the Licence Areas whilst the Proposed Survey Works are being undertaken will be necessary – temporary and short-term and the beach will be re-instated to its condition prior to the Proposed Survey Works.
- Reporting will include:
 - Supporting Information for Screening Appropriate Assessment (SISAA)
 - Natura Impact Statement
 - Risk Assessment for Annex IV Species
 - Assessment of Impacts on Maritime Usage (AIMU) Report
- Overlaps have been identified with spawning and nursery habitats of commercial fish species:

Species	Nursery Grounds	Spawning Ground
Whiting		A,B
Cod	A,B,C,D	A,B,C,D
Haddock	A,B,C	A,B,C,D
Mackerel	A,B,C,D	
Horse Mackerel	A,B,C,D	

- Figure 2 in the submission shows the location of licence areas A to D, and Figure 3 overlaps with Special Protection Areas and Special Areas of Conservation, which are coincidental with all licence areas:

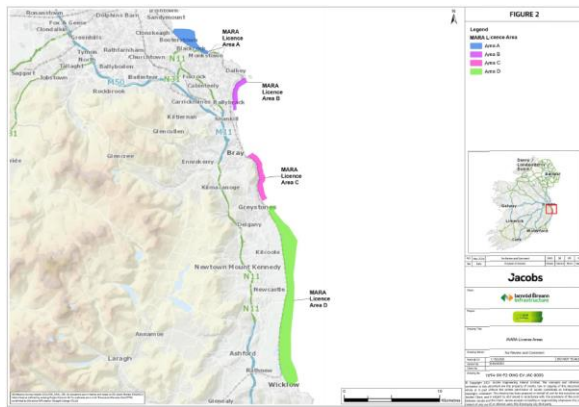


Figure 2. License area overview

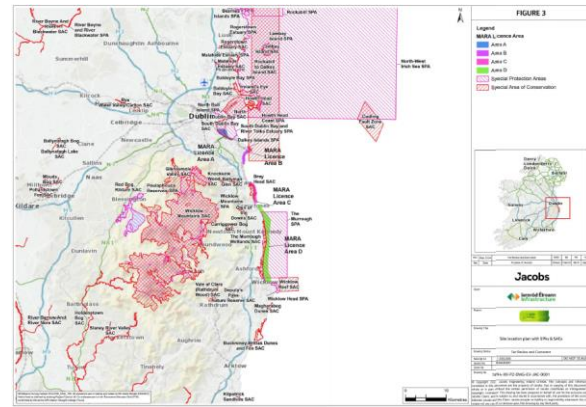


Figure 3. Site location with SPAs and SACs

The submitted report “Assessment of Impacts of Maritime Usage Report” accurately reports the overlaps with local fisheries related activities:

Two main harbours support commercial fishing landings in the proximity of the project boundaries: Dun Laoghaire (just south of Licence Area A) and Wicklow (Licence Area D): vessels <12m.

Landings can include catch from outside the project areas. In 2022 landings by Irish vessels at Dun Laoghaire were 25 tonnes (estimated value €590,000) and Wicklow 1695 tonnes (estimated value €2,960,000). A further 742 tonnes (€6,969,000) was landed by foreign vessels at Dun Laoghaire.

Nursery and spawning grounds of commercially important species are coincidental with the proposed licence areas, including whiting, cod, haddock, mackerel and horse mackerel.

Near shore fisheries predominantly comprises whelk potting – carried out through all licence areas. Lobster and crab are targeted by demersal creel fishing south-east of Dalkey (Licence Area B) and Dunbar Head (Licence Area D). In the same locations trammel net fishing is also undertaken for demersal (seabed) fish species.

In coastal waters east of Licence Area D, dredging is undertaken for seed mussel, primarily between 1 and 7 km offshore, extending out to 15km.

Recreational fishing is an extensive activity across licence areas. Popular coastal fishing locations are reported with targeted species including important commercial species.

Impacts

Potential impacts of the proposed activities on marine biota primarily relate to physical disturbance and noise. Physical disturbance arising from geophysical sediment sampling using hydraulic hammer, causing noise, vibration and sediment disturbance and suspension. Mobility of fish and limited operational time exposure should result in limited impact. Bathymetric surveys and sub-bottom profiling put sound energy into the water column and have been flagged as disturbing to fish and cetaceans. The short operation time and mobility of fish and cetaceans should result in limited effect. A Marine Mammal Observer (MMO) will be required (and is stated) and operations will need to follow NPWS *Guidance to manage the risk to marine mammals from man-made sound sources in Irish waters* (NPWS, 2014).

The proposal states:

“Due to the nature of The Proposed Survey Works, there will be no impacts on commercial fisheries, recreational sea angling or aquaculture. There will be no changes to commercial fisheries, or to employment within the fishing industry anticipated as a result of the works.”

Operators should be expected to publish operational survey intentions broadly to the fishing community and abide by navigational requirements to ensure fishing activities are not unduly impacted.

Cumulative Effects

The application incorporates aspects of a Cumulative Effects Assessment (CEA) approach following MARA’s stepwise approach for assessing interactions and impacts. (see doc. “Screening for Appropriate Assessment for Maritime Usage Licence Application LIC240023”).

Cumulative impacts from multiple projects were considered. Eleven projects were identified largely from licencing and planning documents, both proposed, yet to be approved, and approved. Of these 11 projects, the CEA states:

“Possible temporal overlap in terms of disturbance and displacement”

While noting that CEA is a developing field, there is insufficient evidence to ascertain whether cumulative effects, due to this proposed development, are significant or not. Of the other identified (proposed/ granted) MUL in the area, potential for survey data exchange across overlapping activities should be considered to reduce repeat activities and cumulative impacts.

The Marine Institute recommends that, for this and other such applications, evaluations are reviewed in a wider context of marine planning for Irish waters. Such planning should be supported by predefined CEA – potentially state-led – reviewing all relevant pressures and ecosystem components; sea and land-based. MARA’s stepwise approach for assessing interactions and impacts is acknowledged as a pathway to this. The Marine Institute does not provide an outline here of how this may be done, but is available for further consultation on design of such a programme of work.