

# TECHNICAL NOTE

Project title:	Allód Energy Ltd MUL240005		
Subject:	Request for Further Information		
To:	MARA		
Project number:	24084	Document ref.:	22084_TN_RFI
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Checked by:	J O'Connor	Date of issue:	24/04/2026
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# 1 INTRODUCTION

Allód Energy Ltd. proposes to undertake marine geophysical site investigations, with the objective of assessing an area in the Celtic Sea for potential hydrogen storage.

A Maritime Usage Licence application was prepared by GDG on behalf of Allód Energy Ltd. for the proposed marine surveys and was received by the Maritime Area Regulatory Authority on 19 September 2024. The MUL application (reference: MUL240005) included the following documentation:

- Application Form
- Site Location Map
- AIMU Report
- RAAIVS Report
- SISAA Report
- NIS Report

Allód Energy Ltd. welcomes the opportunity to provide this submission in response to the request for additional information issued on 31 March 2026.

# 2 RESPONSE TO RFI

**1. With reference to the strict protection of species listed under Annex IV of the Habitats Directive (92/43/EEC), confirm if you are required to apply for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. If yes, provide details of the application submitted, including the NPWS Licence Derogation Number or application reference number.**

NPWS were contacted for advice regarding the submission of a Derogation Licence. Under NPWS advice, an application has been submitted.

NPWS has issued an email to confirm receipt of the application for the Derogation Licence, which is included as a supporting document accompanying this response.

**2. The Assessment of Impact of the Maritime Usage (AIMU) states that “The proposed survey will involve a 15m x 15m array of approximately 25 small airguns...” (pg. 6), however the Risk Assessment for Annex IV Species states that “The proposed survey will involve... 40 small airguns...” (pg. 4). Please clarify the proposed number of small airguns to be used.**

- The proposed survey involves a 15m x 15m array of approximately 40 small airguns with a combined volumetric capacity of c. 4500 cubic inches (cu.in.)

The revised AIMU report which accompanies this response has been updated accordingly.

**3. Data for the years 2014-2018 from Ireland’s Marine Atlas (2021) were used to assess overlap between the proposed maritime usage and commercial fisheries as part of the Assessment of Impact of the Maritime Usage (AIMU) Report. However, more recent fisheries data is available from The Atlas of Commercial Fisheries Around Ireland, 4t Edition1 (2024). Please provide an updated assessment of commercial fisheries overlap with the proposed maritime usage.**

More recent fisheries data has been used to inform an updated assessment of commercial fisheries overlap with the proposed maritime usage, as detailed in the revised AIMU report which accompanies this response.

**4. The Risk Assessment for Annex IV Species mentions the potential use of Acoustic Deterrent Devices (ADDs) to mitigate against possible impacts of the proposed maritime usage on marine mammals and reptiles. However, the use of ADDs has not been mentioned in the Supporting Information for Screening for Appropriate Assessment (SISAA) Report, or the Natura Impact Statement (NIS) provided.**

- a. Confirm if ADDs are proposed to be used**
- b. If so, provide additional information on the proposed use of ADDs, as follows:**
  - i. Specify the activities within the proposed maritime usage for which ADDs are proposed to be used**
  - ii. Indicate the focal species for which ADDs will be used**
  - iii. Indicate the impacts for which ADDs will mitigate against (e.g. underwater noise, entanglement, etc.)**
  - iv. Provide justification for the proposed use of ADDs**
  - v. Indicate the type(s) of ADD to be used and provide full specification details for the equipment (including details on sound output levels)**
  - vi. Provide a full methodology for the proposed ADD use in line with current relevant best practice guidance**
  - vii. Where required, revise the Risk Assessment for Annex IV Species, the SISAA Report and the NIS, in light of the responses provided to a) and b) i-vi above**

It is confirmed that ADDs are not proposed to be used.

For context, at the time of submission of the MUL application, the applicant was of the view that a revision of the DAHG 2014 guidance, which may set out criteria for the use of ADDs as mitigation for noise producing activities in Irish waters, would be published before the MUL was granted. This has not yet occurred.

The revised RAAIVS report which accompanies this response has been updated accordingly.

# **APPENDIX A UPDATED ASSESSMENT OF IMPACTS FOR MARITIME USAGE (AIMU)**

## **APPENDIX B UPDATED RISK ASSESSMENT FOR ANNEX IV SPECIES (RAAIVS)**

## **APPENDIX C DEROGATION APPLICATION CONFIRMATION EMAIL FROM NPWS**

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