



November 12, 2025

licence@mara.gov.ie

RE: Request for observations – MUL Reference: LIC230013

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the application from the Port of Waterford for a Maritime Usage Licence under the Maritime Area Planning Act 2021 for geotechnical investigation works at the Port of Waterford, Belview, Co. Kilkenny.

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 **geotechnical investigation works** at the Port of Waterford 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 are reflected in the Government's Food Vision 2030 policy.

To inform the DAFM comments, the observations of the Marine Institute (MI), Bord Iascaigh Mhara (BIM) and the Sea Fisheries Protection Authority (SFPA) on the application were requested.

The MI observed that the overall impact of the immediate proposed development on sea-fisheries is "negligible", however, regarding aquaculture, an oyster farm occurs within the locality of the proposed works (~4km) and construction, and dredging activities could potentially increase water turbidity. This has the potential to result in a smothering event, with vibrations simultaneously negatively impacting feeding behaviour and aquaculture productivity.

The MI recommend that further information should be sought from Inland Fisheries Ireland regarding salmonids.

BIM noted while the Environmental Impact Assessment Report (EIAR) is mainly concerned with the local impact to the site on species of fish many which are not available to commercial fishing, the EIAR does highlight some potential impairment of the water quality generally.

BIM recommends that care should be taken to minimise the impact of water quality on commercial fish species and aquaculture sites further downstream from the construction. There is potential release of pollutants currently lying dormant in the sediment at the site entering the surrounding and downstream water bodies, and also from the operational phase arising from the additional activity at the site.

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

Government Buildings, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85 TX47

T +353 (0)23 8859500

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Therefore, BIM recommends that the usual channels of communication be utilised, such as Marine Notices, the Producer Organisations, the relevant harbour port offices and local authority offices, and local media where possible, in making relevant users aware of the potential effects arising from the proposed works.

SFPA notes that there is expected to be localised noise impact during the project's 3-week period and advise that the project avoids commencement between November and January, which is a crucial period for spawning stocks of commercially important fish species that spawn in the estuary.

DAFM notes that Vessel Monitoring System (VMS) data regarding the activity of inshore fishing vessels in the vicinity of the proposed works may 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 the proposed works are not anticipated to unduly impact on inshore fisheries, relevant local fishing organisations should nevertheless be included on the provision of any Notices to Mariners in this respect and be made aware of proposed works at the earliest opportunity.

It would appear from the Assessment of Impact on the Maritime Usage Report that "the site is not located within the navigational channel, therefore, there will be no impacts to navigation". It is acknowledged that the Harbour Master for the Port of Waterford will be informed of the works, and risk assessments and method statements for the works will be approved by the Harbour Master prior to the commencement of works.

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 **geotechnical investigation 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.

DAFM would 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 geotechnical investigation works.

Please also find attached documents from the MI, BIM and the SFPA which provide further comments for consideration.

Yours sincerely,

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

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