



28<sup>th</sup> November 2025

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RE: Maritime Usage Licence Application - Reference LIC230014MA

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the proposed amendments involving additional Marine Site Investigation works in two extra areas to those licenced in MUL (LIC230014) which will result in an increase in the footprint of the licensed works.

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 investigation works are 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 the DAFM comments, the observations of the Marine Institute (MI) on the application were requested.

Having reviewed the application documents, the MI agrees that the proposed survey operations are temporary and spatially limited and are not expected to substantially interfere with fish stocks, fishing activities, or aquaculture operations in the area.

Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. Vessel Monitoring System (VMS) data regarding fishing in, and around, the licence application area 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 impact unduly 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.



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 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*