



13th November 2025

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RE: Request for Observations – MUL Reference: MUL230015

A Chara

The Marine Divisions of the Department of Agriculture, Food, and the Marine (DAFM) welcome the opportunity to provide comments on to conduct a **strategic modelling study** of water currents and bathymetry along a section of the South Cork Coast between Cork Harbour and Roaring Waters Bay.

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 **strategic modelling study** 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) and Bord Iascaigh Mhara (BIM) on the application were requested.

The MI observed that the proposed license areas overlap or are in close proximity to marine and coastal Special Areas of Conservation (SAC) and Special Protection Areas (SPA) and, as noted in the application, are coincidental with spawning and nursery grounds of a range of commercial fish species.

The MI state that, independently, the proposed survey operations should not substantially interfere with fish stocks, fishing, and aquaculture activities in the area. It is assumed that the necessary notices to mariners and fishing vessels will be made regarding the deployment of seafloor monitoring devices.

The MI would like to point out the potential for cumulative impacts between these and other survey activities that may be active in the local vicinity.

BIM note the potential disturbance to fishing, and accidental entanglement with static fishing gear by the survey vessels, and vice versa. Disturbance to fishing activities is likely to be minimal as BIM do not envisage a requirement for fishers to stay out of the study areas.

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However, the risk of damage to static fishing gear and deployed survey equipment is a more realistic one. Instances of this has happened historically, where strings of pots were reported as being towed by survey vessels.

In relation to any bathymetric scans and vessel mounted ADCP in aquaculture production areas the applicant would need to be cognisant of the presence of structures such as rope mussel longlines and oyster trestles and navigational poles close to oyster licenced sites which will not be navigable directly above them even on high tides.

The main comment to make therefore is that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising from such incidents as stated above.

BIM do not envisage any issues with the bottom and vessel mounted ADCP locations regarding aquaculture activities and a normal notice to mariners would suffice.

DAFM notes that pot fishing occurs within the subtidal areas of all the proposed licence areas and dredge fisheries occur within sections of areas A (surf clam) and B (surf clam and cockle). Vessel Monitoring System (VMS) data regarding fishing in, and around, the proposed licence areas 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.

The Assessment of Impacts of the Maritime Usage Report sets out that minor inconvenience may be encountered by fishing vessel operators due to location of the ADCP on the seabed, but this will be temporary and for a short period.

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 of the **strategic modelling study** 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 marine survey operations.



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

Yours sincerely,

Marine Divisions
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food, and the Marine