



24 February 2025

licence@mara.gov.ie

**RE: Introductory letter - Deep Sea Fibre Networks Ltd.
Marine Survey and Site Investigations for a cable route for the PISCES subsea
telecoms cable system from a landfall at Ballyloughane County Galway traversing the
Irish Maritime Area to the south west of Ireland.**

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the Licence Application MUL230024 Reference no MUL230024 Title of Application MUL230024 – Deep Sea Fibre Networks Ltd. In order to inform the DAFM comments, the observations of both the Marine Institute (MI) and Bord Iascaigh Mhara (BIM) on the application were requested. These have been attached here for your attention. In respect of agency observations, DAFM would like to particularly draw your attention to:

- MI comments that the survey route passes through the Aran Grounds fishing grounds, which is an important fishing area for the Irish fleet to fish for prawns, our most important whitefish stock. The MI further comment that the survey route overlaps with spawning and nursery grounds of selected commercial fish species, including herring, which is a depleted stock. DAFM would like to stress the importance, for this reason that any geographical surveys are undertaken outside of the main spawning and fishing periods.
- BIM comments that inshore pot fishing for crab and lobster also takes place in the area and interference with pots should be avoided.

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 activity 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 is reflected in the Government's [Food Vision 2030](#) policy.

According to BIM's Business of Seafood 2023, the volume of fish landed in Ros an Mhíl, in 2023 by Irish and non-Irish vessels was 1,700 tonnes, valued at €20 million. This can assist in demonstrating the seafood sector's socio-economic reliance on the surrounding coastline and this should be fully recognised and factored into surveys or site investigations plans, in order to avoid, minimise and mitigate adverse impacts on the seafood sector.

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Inshore and offshore fisheries may be impacted by the increase in vessel activities associated with site surveys and investigations. The Assessment of Impacts on the Maritime Usage (AIMU) Report outlines that consultation with seafood representatives and engagement with local fishing fleets will be carried out prior to any works to avoid disruption to fisheries and prevent a direct overlap of fishing with the site investigations and sampling associated with the proposed licence. The Department welcomes this approach and also notes and acknowledges that the applicant has included a number of mitigation measures to reduce the impacts of the proposed site investigation works, including conducting such investigations outside of certain spawning periods and in reducing the impacts of survey related noises.

DAFM recognises that the applicant'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 activity 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, in that order, and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas and must demonstrate how avoidance of significant adverse impacts is considered as first principle.

DAFM notes that where the cable surveys may traverse traditional fishing grounds, Fisheries liaison and consultation with local stakeholders will be undertaken prior to and throughout the works. In this regard, DAFM seeks confirmation that 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. All relevant fishing organisations should receive any applicable Marine Notice/s, and be made aware of any proposed site survey and investigation works, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible.

Please find attached documents from the Marine Institute and Bord Iascaigh Mhara 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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