



October 28, 2025

licence@mara.gov.ie

RE: Request for Observations – MUL230029

A Chara,

The Marine Divisions of the Department of Agriculture, Food, and the Marine welcome the opportunity to provide comments on the Maritime Usage Licence for maintenance dredging at Haulbowline Naval Base, Co. Cork.

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 dredging 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.

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

The MI observed that, after review of the information in the application documents, particularly the modelling of sediment plumes from the dredging and disposal sites, likely impacts on fish stocks and the associated fisheries were expected to be minimal.

According to the sediment plume analysis the sediment load should be no more than background levels before reaching the nearest licenced aquaculture site.

Similarly for the disposal site, sediment is not expected to reach any sensitive spawning habitats. Also, the disposal site does not overlap with any of the ecologically sensitive areas identified by the MPA Advisory Group in the Celtic Sea Ecological Sensitivity Analysis. Resuspension of contaminated sediment could be a concern, however.

The SFPA stated they would have concerns if the proposed dredging included the entire basin and graving dock, as this could impact the effectiveness of differentiating and separating contaminated spoil from dredged material suitable for dumping at sea.

As an active Oyster production area is located in the Rostellan/Aghada area approximately four nautical miles east of Haulbowline, disturbed contaminated spoil

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emanating from the basin could pose a serious deleterious effect on the microbiological quality of Oysters produced in Rostellan.

Alternatively, if the application is only for maintenance dredging of the entrance channel and of Haulbowline Basin excluding the contaminated area of the Graving dock with subsequent disposal of dredge spoil at the Cork Harbour Dredge spoil disposal area south of Power Head, it is believed by the SFPA, that the proposed activities outlined in the application will not have an impact on shellfish growing areas, as no such shellfish growing areas are in existence within the Power Head Area.

BIM believe that the proposed works will have a negligible impact.

DAFM notes that pot fishing can take place in the vicinity of the proposed works, according to [Ireland's Marine Atlas](#). However, Vessel Monitoring System (VMS) data regarding fishing in the 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 this proposal is not anticipated to impact unduly on inshore potting fisheries, all 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 to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible.

DAFM also 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 operations.

DAFM recognises that the applicant's aim is to promote co-existence and minimise potential disruption to commercial fishing activities in the area and notes the applicant's referral to the National Marine Planning Framework. (NMPF). The evaluation of potential impacts of **proposed dredging 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 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.

Please also find attached documentation from the MI 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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