



**Licence Ref:** MUL230036  
(Please quote in all related correspondence)

12 January 2026

Maritime Area Regulatory Authority  
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Via: licence@mara.gov.ie

Referral under Regulation 42(6) of the European Communities (Birds and Natural Habitats) Regulations 2011

**Re:** Maritime usage licence application. The proposed maritime usage involves the salvage operation of the cargo of the SS Ohio, a World War I era steamship located 142 NM from the Irish territorial waters at a depth of 330 meters. The objective is to retrieve non-ferrous metals from the wreck site while ensuring minimal environmental impact.

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I refer to correspondence on 8 December 2025 received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

### Underwater Archaeology

- The site, as suggested by the applicant, is that of the SS *Ohio*, a WWI steamship.
- Located c. 142NM from Ireland's territorial waters, in 330 metres depth of water.
- 51°N 52,720; 014°W 16,880.
- Wreck in two sections on seafloor (ref: Salvage Plan).
- No specific proof of the wreck's identify provided apart from written statement.



- No proof of ownership apart from written statement, i.e. French owned (ref: Salvage Plan).
- The applicant clearly states that the wreck is of historical significance (ref: Assessment of Impact of the Marine Usage (AIMU) Report).
- The AIMU Report states that 'The Project includes provisions for reporting any archaeological findings and ensuring that the salvage operation does not disturb historically significant areas'. However, no reporting plan is included in the application and no significant historical parts of the wreck or area has been highlighted.
- AIMU Report 'efforts will be made to avoid disturbing these areas...' and 'project's approach ensures that cultural heritage is preserved...'. This has not been demonstrated.
- The section on Cultural Heritage in the AIMU Report is inadequate and does not address the potential impact on the wreck site.

The National Monuments Service is of the view that further information is required. In particular the following should be addressed:

- No proof of ownership is included.
- No permission of owner is included.
- No proof of wreck ID is included.
- The Cultural Heritage section of the AIMU Report does not constitute an Underwater Archaeological Impact Assessment (UAIA).

As the wreck being proposed as the focus of salvage, i.e. potential remains of 1917 SS *Ohio*, is a wreck over 100-years old, it may fall within the scope of the 2001 UNESCO Convention on the Protection of Underwater Cultural Heritage. As such, and in keeping with the Rules of the Annex of the 2001 Convention, a detailed UAIA should be undertaken to inform on all identifiable (direct and indirect) impacts that may occur to the wreck site.

#### **UAIA:**

The following should form the basis of the assessment:

- Undertaken by a professional archaeologist with underwater cultural heritage experience.
- A detailed desktop study be undertaken, to include looking at the wreck data for the area, inform on the significance of the SS *Ohio*, its loss, etc.
- Review all information and results from surveys undertaken at the wreck site to understand the condition of the wreck and how it may/will be impacted.
- Set out a detailed Impact Statement.
- Put forward informed mitigation and recommendations for avoiding/limiting impact to the wreck site.



### **Recommendations:**

The National Monuments Service strongly recommends the following:

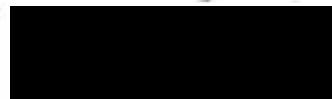
- The Maritime Area Regulatory Authority (MARA) includes as a condition the requirement for a detailed UAIA to inform on the potential impacts to the wreck site, to take the form of that set out above. Applicants to submit UAIA Report to MARA and the National Monuments Service for further review and comment in advance of any salvage taking place;
- MARA seeks more definitive proof (ideally visual) of identity to ensure this is the remains of the 1917 wreck *SS Ohio*;
- MARA includes as a condition(s) a requirement that the applicants:
  - Consult formally with the authorities in their own state, it being the Belgian authorities, as it is a Belgian-registered salvage vessel (*N35*).
  - Consult formally with the French authorities, who have indicated their interest in the wreck of *SS Ohio*, it being a wreck and former merchant vessel in French ownership.
  - In particular, the applicants should seek clarification from both authorities regarding their legal obligations in relation to the wreck, given that it appears to come within the scope of the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage (both Belgium and France are States Parties to the 2001 UNESCO).

The National Monuments Service is available to discuss any of the above.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) [fem.dau@npws.gov.ie](mailto:fem.dau@npws.gov.ie), or to the following address:

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