

Maritime Usage Licensing and Planning Advisory Directorate

Maritime Usage Licence Assessment Report

To:	John Evans, Director	From:	Ross Fitzgerald Marine Analyst	
Date:	26/06/2026	Maritime Usage Licence Application Reference No:	MUL230036	
MUL Applicant Name:	SEATEC NV			
MUL Applicant Registered Address:	Verversrui 15, 2000 Antwerpen, Belgium			
Licence application received:	31/05/2024			
Types of maritime usage activities in accordance with Schedule 7 of the Maritime Area Planning Act 2021:	3. Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000			
	7. The use of a vehicle, vessel (including a craft capable of travelling on, in or under water, whether or not self-propelled), boat, aircraft, marine structure (other than a pipeline) or floating container to remove any substance or object from the seabed			
Location of proposed maritime usages:	Porcupine Bank (265km West of Valentia, Co. Kerry)			
Environmental Impact Assessment (EIA) Screening	EIA not required (EIA Screening Form dated 03/03/2026)			
1st request for additional information (RAI) issued:	08/12/2025	Response to 1 st RAI received	30/01/2026	
2nd RAI issued:	24/04/2026	Response to 2 nd RAI received	25/05/2026	
Appropriate Assessment (AA) Screening	N/A			
Notice requesting Natura Impact Statement (NIS) issued:	N/A	NIS received:	N/A	
Public body consultation:	08/12/2025 – 12/01/2026	Observations from public bodies received:	Seven	
Public consultation:	N/A	Submissions from the public received:	N/A	

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1. Background

SEATEC NV (the applicant) has applied to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence (MUL) to undertake *Marine environmental surveys for the purposes of site investigation*, falling under Schedule 7(3) and *The use of a vehicle, vessel (including a craft capable of travelling on, in or under water, whether or not self-propelled), boat, aircraft, marine structure (other than a pipeline) or floating container to remove any substance or object from the seabed*, falling under Schedule 7(7) of the Maritime Area Planning Act 2021, as amended (the MAP Act). The proposed maritime usages are required to survey and to salvage the cargo of a wreck, believed to be that of the *SS Ohio*, a World War I era steamship which was torpedoed and sunk by the German submarine *U-44* on 7/03/1917¹.

2. Location and Description of the Proposed Maritime Usages

The proposed maritime usage licence area is located on the Porcupine Bank, 265km west of Valentia, Co. Kerry (see Figure 1). The objective is to retrieve non-ferrous metals from the target wreck and its immediate environs. The applicant states that the cargo of the *SS Ohio* consisted of 6000 tons of metals, comprised of 4600 tons of steel, 720 tons of brass, 250 tons of zinc and 250 tons of copper when it was sunk.

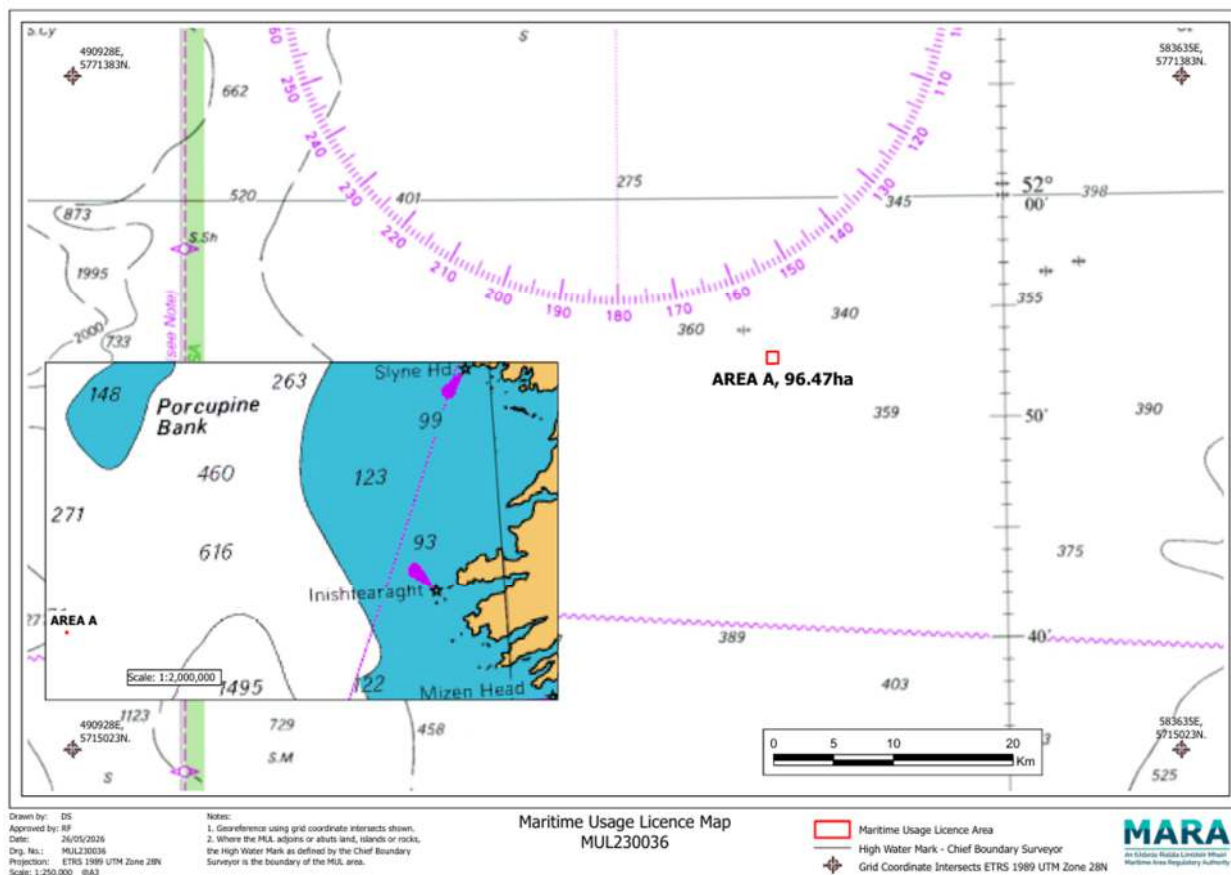


Figure 1 – Location of the Proposed Maritime Usage

¹ <https://www.wrecksite.eu/wreck.aspx?159593>

The proposed licence area does not correspond with the location of the *SS Ohio* as recorded on the *Wreck Inventory of Ireland Database*² (WIID) and the *National Monuments Service Wreck Viewer*³. The applicant notes that the WIID entry for the *SS Ohio* is a historical estimate, not a surveyed position and has submitted reports with their application, outlining their reasons for concluding that the target wreck is that of the *SS Ohio*. However, the applicant has not provided any historical documents or visual proof in support of their proposed identification of the target wreck to be that of the *SS Ohio*.

The applicant states that the target wreck was discovered by them on 17/06/2023 during a multibeam echo sounder survey conducted at several suspected positions derived from historical sources, including German naval records, *U-44*'s war patrol log, Lloyd's of London contemporary records, and post-sinking Allied naval assessments. Further visual surveys were carried out using a remotely operated vehicle (ROV). The applicant states that the results of this ROV survey provided information on the dimensions, orientation, propulsion system and hull construction, as well as observable damage consistent with a torpedo detonation amidships which supports their conclusion that the target wreck is that of the *SS Ohio*.

The applicant conducted salvage operations between 19/06/2024 and 31/06/2024 and recovered cargo material from holds 1 and 3 of the target wreck, which are claimed to be consistent with the documented cargo of the *SS Ohio* and inconsistent with any other identified wreck in the area. They note that no other vessel carrying a comparable cargo of mixed non-ferrous metals is recorded as having been lost in the vicinity of the target wreck.

As part of their application, the applicant has provided a Salvage Plan which details the procedures to be implemented in the proposed salvage operation. The proposed maritime usage involves a number of stages:

Stage 1: Reinvestigating the wreck by scanning the site (using Multibeam Echosounder and Side Scan Sonar) and exploring with cameras. A Remotely Operated Vehicle (ROV) will be deployed to locate and mark the salvage points using ultra-short baseline (USBL) sonar.

Stage 2: Retrieval of cargo using grabs deployed via crane on the ships deck. The grabs will be equipped with a camera, lights and a USBL transponder. There will also be occasional redeployment of the ROV to rescan the wreck site.

Stage 3: Once the vessel's deck reaches its maximum capacity, or the salvage operations are completed, the vessel will sail to port for cargo discharge. The planned port for unloading is Vlissingen in the Netherlands.

The applicant states that salvage operations may extend up to two years to allow contingency for weather factors and any mechanical issues. It is estimated that there will be five cargo retrievals per hour. The salvage operation is planned during the summer season, stopping

² <https://data.gov.ie/dataset/national-monuments-service-wreck-inventory-of-ireland>

³ <https://www.archaeology.ie/advice-and-support/locate-a-monument-or-wreck/wreck-viewer/>

during the winter season due to adverse weather conditions. The applicant has applied for a licence duration of two years.

2.1 Brief description of the site characteristics

As per Figure 1, the proposed maritime usage area is located in an area of the Porcupine Bank with an approximate depth of 330m. The benthic broad habitat type is deep-sea mud to muddy sand.

3. Assessment

In assessing a MUL application, MARA must have regard to the criteria specified in the MAP Act, as discussed in this section.

3.1 National Marine Planning Framework (NMPF)

Under section 121(2)(a) of the Maritime Area Planning Act 2021 (as amended) (the MAP Act), MARA shall have regard to the NMPF, which sets the framework for implementing the forward planning component of our marine planning system as set out in the MPPS.

The applicant has, as part of the Assessment of Impacts of the Maritime Usage report submitted in support of this application, identified and confirmed the relevant marine planning policies which apply to the proposed maritime usage. A number of environmental and sectoral activity policies detailed in the NMPF are covered in other sections of this report, including, but not limited to, the National Biodiversity Action Plan (NBAP), the Birds and Habitat Directives, the Water Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD) and Consideration of other maritime users.

Underwater Cultural Heritage.

Chapter 7 of the NMPF includes a policy on Heritage Assets (“Heritage Assets Policy 1” as set out at section 7.3), which supports the conservation of Ireland’s underwater cultural heritage, including the historic environment and heritage assets both along the coast and in the underwater environment. The policy provides that proposals which do not specifically contribute to enhancing cultural heritage assets must demonstrate that they avoid, minimise or mitigate against harm to heritage assets. The policy expressly states that if it is not possible to mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. Proposals should also consider evidence regarding the level of significance of a heritage asset, including information and advice from relevant regulators and advisors, and on how they are managed. MARA has consulted with the National Monuments Service of the Department of Housing, Local Government and Heritage (DHLGH) and received a detailed submission in relation to this application from the Development Applications Unit (DAU) of DHLGH, incorporating observations from The National Monuments Service (NMS), which addressed the importance of underwater archaeology. This submission is dealt with in further detail in Section 6 below.

The proposed maritime usage has the potential to cause harm to the wreck of the *SS Ohio*. The applicant states that while the salvage operation will utilise two grabs equipped with cameras, lights and USBL transponders to ensure precise cargo removal, the proposed operations will cause localised, precisely controlled disturbance to the cargo holding areas of the *SS Ohio*. It is stated by the applicant that this is inherent to the nature of a cargo recovery and that they do not seek to minimise this disturbance. Thus, the proposed maritime usage clearly does not support Heritage Assets Policy 1 of the NMPF.

3.2 Environmental Impact Assessment Directive (2014/52/EU) (EIA Directive)

MARA carried out a screening for EIA of the proposed maritime usage, having considered Schedules 5 and 7 of the Planning and Development Regulations 2001. An EIA Screening Form was issued by MARA on 03/03/2026 and it was concluded that the activities do not fall within the scope of the EIA Directive and therefore an EIA is not required.

3.3 National Biodiversity Action Plan (NBAP)

Ireland's 4th National Biodiversity Action Plan sets the national biodiversity agenda for the period 2023–2030. The objectives of the NBAP focus on the conservation and restoration of biodiversity. Objective 2 of the NBAP is to meet urgent conservation and restoration needs. Part of its focus is to elevate efforts to tackle invasive alien species. It is recommended that a condition be included in any licence granted, to address the potential risks from invasive alien species as a result of the survey activities. Sections 3.5–3.8 of this report also address the Habitats and Birds Directives, WFD and MSFD and recommend conditions to be included in the licence, if granted, to minimise impacts on biodiversity from the proposed activities.

3.4 Climate Action and Low Carbon Development Act 2015, as amended

Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended (the 'Climate Act') requires relevant bodies, including MARA, to perform their functions in so far as practicable in a manner consistent with the governance framework set out therein. The Act sets legally binding targets for the reduction of greenhouse gases by 2030 and net-zero emissions by 2050. Considering the temporary nature of the proposed activities, no significant increases in carbon emissions are expected to be produced.

3.5 Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) requires EU member states to protect and improve water quality in all waters to achieve at least good ecological status in inland surface waters, transitional waters, coastal waters and groundwater by 2027, at the latest. The ecological status of coastal waterbodies is based on the assessment of biological quality elements (phytoplankton, benthic invertebrates, macroalgae, angiosperms) as well as supporting chemical (specific pollutants), physico-chemical (e.g. temperature, salinity, nutrients) and hydromorphological quality elements. As the proposed maritime usage will take place 65 km

from the nearest landfall, it is anticipated that it will not have a significant effect on water quality of inland, transitional and coastal surface waters and/or groundwaters.

3.6 Marine Strategy Framework Directive (2008/56/EC)

The Marine Strategy Framework Directive (MSFD) sets the framework for European marine environmental policy. It aims to achieve Good Environmental Status (GES) for all marine waters in Europe and protect the resource base for marine related economic and social activities. Ireland’s 2024 assessment⁴ under Article 8 of the MFSD sets out the status of the 11 qualitative descriptors that describe the state of the marine environment. Table 1 sets out the status of the relevant descriptors and assesses the potential impacts of the proposed activities.

Table 1: Assessment of impact of proposed activities on MSFD descriptors

MFSD Descriptor	Good Environmental Status achieved	Assessment
Biological diversity	Partially achieved	MARA was unable to undertake a screening for Appropriate Assessment respect to the proposed maritime usage. Therefore, the potential impacts of the proposed maritime usage on this descriptor have not been fully characterised and could not be adequately assessed.
Non-indigenous species	Yes	To ensure that the proposed activities will not result in the unintended introduction of non-indigenous species, a condition is recommended to be included in any licence granted, relating to the control of invasive species.
Population of commercial fish/shellfish	Partially achieved	The applicant’s assessment of the proposed maritime usage concluded that the proposed licence area is not within a significant fishing ground and that the proposed activities would not have an effect on abundance, distribution, or population structure of commercial fish species. However, the proposed licence area does overlap with gill net and long line fishing areas and is adjacent to important <i>Nephrops</i> and demersal fishing grounds. In addition, the applicant has not provided an assessment of any overlap of the proposed licence area with fish spawning or nursery grounds, however the area does overlap with spawning grounds for Blue whiting, Horse mackerel and Megrim and nursery grounds for Blue whiting and Megrim. Therefore, the potential

⁴ [Ireland's Marine Strategy Part 1: Article 8, 9 and 10 report 2024.](#)

		impacts of the proposed maritime usage on this descriptor have not been fully characterised and could not be adequately assessed.
Marine food webs	Unclear	The balance and diversity in marine food webs is not expected be impacted as a result of the proposed maritime usage
Eutrophication	Yes	The proposed maritime usage does not involve the addition of nutrients to the marine environment and as such will not impact this descriptor achieving GES.
Sea-floor integrity	Partially achieved	The seabed habitat in the proposed licence area may experience temporary disturbance due to the proposed salvage activities. However, seabed habitat conditions are expected to return to normal levels relatively quickly. It is recommended that a condition be included in any licence granted, requiring the holder to remove all plant and equipment associated with the activities and to restore the licensed area to its original condition. It is not expected that the activities will negatively impact on the GES status of this descriptor.
Alteration of hydrographical conditions	Yes	The proposed activities will not alter the hydrographical conditions (e.g. changes in wave action, currents, salinity, temperature) in the proposed licence area. There will be no impact on the GES status of this descriptor.
Concentrations of contaminants	Yes	The applicant states that the target wreck was a coal-fired seam vessel and does not carry any liquid hydrocarbon fuel and that any coal bunker storage is inaccessible and physically contained. It is recommended that a condition be included in any licence granted, relating to the preparation of an oil pollution emergency plan to mitigate for any accidental introduction of contaminants to the marine environment from any vessels employed in the proposed maritime usage. Given the nature and duration of the proposed maritime usage, it is not expected that the maritime usage will negatively impact on the GES status of this descriptor.
Contaminants in fish/seafood for human consumption	Yes	The proposed maritime usage activity will not result in the introduction of contaminants in fish or seafood and therefore, will not impact on the GES status of this descriptor.
Marine Litter	No	The proposed maritime usage may result in the introduction of marine litter to the marine environment as a result of the proposed salvage operations. It is recommended that a condition be

		included in any licence granted, requiring the holder to remove all plant and equipment associated with the activities and to restore the licensed area to its original condition.
Introduction of energy including underwater noise	Yes	The impacts of underwater noise introduced as a result of the proposed maritime usage are assessed within the Annex IV Risk Assessment submitted by the applicant and in Section 3.7 of this report. However, underwater noise impacts could not be fully assessed due to MARA being unable to carry out a Screening for Appropriate Assessment (see Section 3.8). Therefore, the potential impacts of the proposed maritime usage on this descriptor have not been fully characterised and could not be adequately assessed.

3.7 Annex IV species

Articles 12 and 13 of the Habitats Directive (92/43/EC) impose obligations on Member States to establish a system of strict protection for animal and plant species listed on Annex IV of the Directive. The applicant submitted a Risk Assessment for Annex IV Species report in support of the MUL application and in line with national guidance on underwater noise⁵. The risk assessment considered the scope of the proposed maritime usage, the relevant Annex IV species (cetaceans and turtles) and the potential impacts of underwater noise as a result of the proposed maritime usage on those species. No other potential impacts were considered.

For the proposed equipment (Multibeam Echosounder (MBES) at 200–400 kHz, Side Scan Sonar (SSS) at 300/600 kHz, Ultra-short Baseline (USBL) at 20–34 kHz), the applicant considered that underwater noise as a result of the proposed maritime usage would not cause injury or disturbance to cetaceans or turtles given the non-impulsive nature of the underwater sources, the high operational frequencies of the MBES and SSS equipment proposed to be used, the spatially confined nature of the proposed maritime usage and the limited duty cycles and short operational durations of the proposed equipment. Notwithstanding this conclusion, the applicant suggests mitigation measures that will be implemented when carrying out geophysical and USBL activities. However, the applicant has not explicitly stated that they will implement the national guidance on underwater noise.

It is recommended to include conditions in the licence if granted, relating to management of underwater noise disturbance and to ensure that the proposed maritime usage will be carried out in accordance with those plans and particulars submitted with the application.

The applicant has stated that a derogation licence from the National Parks and Wildlife Service (NPWS) under the (Birds and Natural Habitats) Regulations 2011, as amended, is not required for the proposed maritime usage.

⁵ [Underwater sound guidance Jan 2014.pdf](#)

3.8 Appropriate Assessment Screening

The Habitats Directive (92/43/EC) and the Birds Directive (2009/147/EC) are transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011, as amended (the Regulations) and by Part XAB of the Planning and Development Act 2000.

The applicant has not fully identified those specific European Sites likely to be impacted by the proposed maritime usage and has not provided a full assessment of the likely impacts on the Qualifying Interests and/or Special Conservation Interests and associated Conservation Objectives of any European Sites likely to be impacted by the proposed maritime usage.

As the applicant has not provided all the information MARA reasonably considers necessary to assist it in determining the application, MARA was unable in this case to carry out screening for appropriate assessment in respect of the proposed maritime usage in accordance with the Regulations.

4. Consideration of other maritime users

MARA has had regard to the rights of other users as set out in Section 3 (3)(b) of the MAP Act. Given its location, the proposed maritime usage will not impact recreational users or commercial shipping. Regarding impacts on fishing activity, the applicant's assessment of the proposed maritime usage concluded that the proposed licence area is not within a significant fishing ground. However, the proposed licence area does overlap with gill net and long line fishing areas and is adjacent to important *Nephrops* and demersal fishing grounds. The proposed maritime usage has the potential to temporarily impact fishing activity during the course of the proposed activities. In order that other maritime users are notified of the proposed maritime usage and to minimise the impacts of the proposed maritime usage on fishers, the following conditions are recommended to be included in the licence, if granted:

- A condition in respect of the requirement to publish a marine notice via the Marine Safety Division of the Department of Transport, prior to the commencement of activities.
- A condition ensuring that the holder of the licence, if granted, does not damage or interfere with any third party's property.
- A condition to appoint a Fisheries Liaison Officer.

5. Site visit

A site visit was not undertaken due to the offshore location of the proposed maritime usage.

6. Public body consultation

Observations on the MUL application were invited from relevant public bodies to ensure that MARA takes account of all other relevant maritime usages and interests in the application area. Seven responses were received. The following tables summarise the observations from public bodies with a response given below each submission summary. The MARA website should be consulted to view the full details of the observations received.

<p>1. Observations summary – Commissioners of Irish Lights (CIL)</p> <p>A submission was received on 12/01/2026 from CIL, which states they have no objection to the proposed maritime usage from a safety of navigation perspective.</p>
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MARA Response:

MARA notes the observations of CIL.

<p>2. Observations summary – Department of Agriculture, Food and the Marine (DAFM)</p> <p>A submission was received on 19/12/2025 from DAFM, which along with its own comments, summarises comments and observations from the Marine Institute and Bord Iascaigh Mhara. These are made in more detail in these agencies’ separate submissions and are considered under the relevant separate headings in this section of the report.</p> <p>DAFM notes that any evaluation of potential impacts on commercial sea fishing activities needs to be given consideration within the context of the requirements of the Maritime Area Planning Act and the National Marine Planning Framework. DAFM notes in particular that 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.</p> <p>DAFM recommends that all relevant fishing organisations should receive any applicable Marine Notice/s, and be made aware of any proposed works, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities.</p>
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MARA response:

MARA notes the issues raised by DAFM. The importance of fishing in the proposed maritime usage area and the potential impacts of this proposed maritime usage application have been assessed under Sections 3.6 and 4 above. It is recommended that conditions be included in the licence, if granted, in respect of the requirement to publish the relevant marine notices, and to appoint a Fisheries Liaison Officer (FLO).

3. Observations summary – Bord Iascaigh Mhara (BIM)

A submission was received on 19/12/2025 from BIM, which states that, while the proposed maritime usage is near the Porcupine Bank *Nephrops* fishing grounds and is within Blue Whiting nursery/spawning grounds, they have no concerns regarding this activity on Fisheries and Aquaculture.

BIM encourage timely notification of fishers, through direct contact using the Irish Fleet Register and via Marine Notices, the relevant Producer Organisations and local media (including Marine Times) covering the impacted area, where possible.

MARA response:

MARA notes the issues raised by BIM. The importance of fishing in the proposed maritime usage area and the potential impacts of this proposed maritime usage application have been assessed under Sections 3.6 and 4 above. It is recommended that conditions be included in the licence, if granted, in respect of the requirement to publish the relevant marine notices, and to appoint a Fisheries Liaison Officer (FLO).

4. Observations summary – The Marine Institute (MI)

A submission was received on 19/12/2025 from the MI, noting that the wreck of the *SS Ohio* is in close proximity to the northern edge of the Porcupine Bank *Nephrops* fishing grounds. Furthermore, the MI indicate that the wreck site is also in close proximity to Vulnerable Marine Ecosystem (VME) Area 51, as identified in the EU deep sea access regulation. The MI recommends that the necessary notices to mariners be made.

MARAs response:

MARA notes the issues raised by the MI. The applicant has provided specific GIS coordinates for the proposed licence area and MARA is satisfied that it is outside VME Area 51. The importance of fishing in the proposed maritime usage area and the potential impacts of this proposed maritime usage application have been assessed under Sections 3.6 and 4 above. It is recommended that conditions be included in the licence, if granted, in respect of the requirement to publish the relevant marine notices, and to appoint a Fisheries Liaison Officer (FLO).

5. Observations summary – Geological Survey of Ireland (GSI)

A submission was received on 11/12/2025 from GSI recommend the use of their various data sets when conducting the EIAR, SEA, planning and scoping processes for any developments, plans and policies.

MARA response:

MARA notes the comments from GSI, however the proposed maritime usage is for site investigations only, therefore they fall outside the scope of this assessment, or are outside the remit of MARA.

6. Observations summary – Department of Housing, Local Government and Heritage (DHLGH)

A submission was received on 12/01/2026 from the Development Applications Unit (DAU) of DHLGH incorporating observations from The National Monuments Service (NMS).

With regard to underwater archaeology, the NMS notes the following points of concern:

- The lack of proof of ownership of the target wreck
- No permission of owner is included
- Insufficient proof of correct identity of the target wreck
- The Cultural Heritage section of the AIMU Report did not constitute a suitable Underwater Archaeological Impact Assessment (UAIA)

The NMS submission provides details of what further information should be included in an UAIA.

The NMS recommends the following:

- MARA to include as a condition, the requirement for a detailed UAIA, to be submitted to MARA and NMS for review
- MARA to seek more definitive visual proof of vessel identity
- MARA to include as a condition a requirement that the applicant:
 - i) Consult with the authorities of the flag state (Panama) of *MV N35* (the vessel to be used to carry out the salvage operations)
 - ii) Consult formally with the French authorities as *SS Ohio* was a French vessel
 - iii) Seek clarification from the French and *MV N35* flag state (Panama) authorities regarding the applicant’s legal obligations under the UNESCO Convention

MARA response:

MARA notes the content of the submission from the DAU of DHLGH containing inputs relating to Underwater Archaeology. The impacts of the proposed maritime usage on underwater archaeology in relation to the NMPF have been discussed in Section 3.1 above.

7. Observations summary – Marine Survey Office (MSO)

A submission was received on 07/01/2026 from the MSO, which states that they have no objection to the proposed maritime usage from a navigational safety perspective.

The MSO recommended conditions to be applied to the licence if granted, which relate to:

1. The requirement for a marine notice to be issued
2. Navigational safety
3. The requirement for *Navtex* and radio broadcast warnings
4. The need to liaise with the MSO and Commissioner for Irish Lights (CIL) regarding the marking and lighting of any moored instruments
5. The need for vessels to be suitably certified
6. The need to notify the MSO if Maritime Autonomous Surface Ships are to be deployed
7. The particulars of information to be provided to the UK Hydrographic Office (UKHO) and INFOMAR

MARA Response:

MARA notes the issues raised by the MSO. The proposed maritime usage does not include the use of Maritime Autonomous Surface Ships. It is recommended that conditions be included in the licence, if granted, in respect of the requirement to publish marine notices, the need for vessels to conform with the requirements of Irish certification standards, the need to provide information to the UKHO and INFOMAR, where relevant, and to not damage or interfere with any third party's property while carrying out the Permitted Maritime Usage. In addition, MARA is required to have regard to the rights of the public or any class of the public over the foreshore in relation to navigation and navigational safety – this requirement has been incorporated into MARA's overall assessment of the licence application.

7. Recommendation

Having considered the information submitted in support of the application, and the criteria specified in the Maritime Area Planning Act 2021, as amended, I recommend that MARA refuses to grant a Maritime Usage Licence in accordance with Section 119 of the Maritime Area Planning Act, 2021, as amended, to **SEATEC NV, Verversrui 15, 2000 Antwerpen, Belgium**, for the purposes of *Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000 and The use of a vehicle, vessel (including a craft capable of travelling on, in or under water, whether or not self-propelled), boat, aircraft, marine structure (other than a pipeline) or floating container to remove any substance or object from the seabed*, for the following reasons:

- 1) The proposed maritime usage does not support Heritage Assets Policy 1 of the National Marine Planning Framework.
- 2) The potential impacts of the proposed maritime usage on Descriptors 1, 3 and 11 of the Marine Strategy Framework Directive could not be adequately assessed.
- 3) MARA was unable to carry out screening for appropriate assessment in respect of the proposed maritime usage in accordance with its legal obligations under the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, as the applicant has not provided all the information MARA reasonably considers necessary to determine the application.

Signed:	
Prepared by:	Ross Fitzgerald Marine Analyst
Date:	26/06/2026