



12th November 2025

licence@mara.gov.ie

RE: Request for observations – MUL Reference: MUL230038

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application from Uisce Éireann for a Maritime Usage Licence for Marine surveys within Ballyness Bay, Falcarragh, Co. Donegal.

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 **marine survey works** 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, in their review of the application documents noted the site overlaps or is near at least three marine/coastal Special Areas of Conservation and two Special Protected Areas. The application notes aquaculture licences in place within the proposed survey area.

The MI state that independently, the proposed survey operations should not substantially interfere with fish stocks, fishing activities or aquaculture activities in the area. The MI assume that the necessary notices to mariners and fishing vessels will be made regarding the deployment of seafloor monitoring devices and that there is potential for cumulative impacts between these and other survey activities that may be active in the local vicinity.

BIM acknowledges the reference to aquaculture and fisheries within Ballyness Bay within the Assessment of Impacts of the Maritime Usage (AIMU) report attached to this application and would highlight the main concern from a fisheries context would be disturbance to fishing, and accidental entanglement with static fishing gear by the survey vessels, and/or by fishing vessels with the deployed survey equipment. Instances of this have happened historically, where strings of pots were reported as being towed by survey vessels.

Early and continuous communication with stakeholders in the survey areas is essential to avoid any conflicts arising from such incidents as stated above.

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

Government Buildings, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85 TX47

T +353 (0)23 8859500

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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 **marine survey works** 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 notes that Vessel Monitoring System (VMS) data regarding fishing in, and around, the area of interest 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 AIMU Report notes that "overall, there are no predicted negative or adverse impacts on any aquaculture area or fisheries activities". While the proposed survey 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 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. 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 to the greatest extent possible.

Please also find attached document 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