



March 18th, 2025

cathal.boyle@galetechenergy.com

RE: Introductory letter - Galetech Energy Developments - announces proposed Allód hydrogen storage project

Dear Cathal Boyle,

The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the *Licence Application MUL240005 Reference no MUL240005 Title of Application MUL240005 - Allod Energy Ltd.*

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 development of the Allód hydrogen storage project 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 are reflected in the Government's Food Vision 2030 policy.

BIM note, according to the Allód hydrogen storage project documentation, that the survey area overlaps with nursery grounds for monkfish, hake, horse mackerel and megrim and spawning areas for horse mackerel, haddock and whiting. The proposed licence area also overlaps with areas for beam trawling, and bottom otter trawling and seine fishing activity. Data from Ireland's Marine Atlas 2018 were used in the application to assess fisheries overlap. More recent fisheries data available from the Marine Institute should be used to provide a more up to date assessment of fisheries overlap.

Please also find attached document from the Marine Institute which provides further comments for consideration. In particular, we would like to stress that the MI have noted that "there is evidence of a range of permanent, non-permanent physical and behavioural impacts" on marine biota, including fish, attributed to sub-seafloor geophysical survey and these concerns need to be taken into consideration in your application.

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 offshore hydrogen storage development on commercial sea fishing activities needs to be given consideration within the context of the requirements set out

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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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.

It is acknowledged that a Fishery Liaison Officer (FLO) has been appointed and has been engaging with local communities, stakeholder and in particular the fisheries and seafood sector. DAFM would urge that early and ongoing consultation with the fishing industry continues to ensure minimum impacts on the seafood industry.

The Department finally advises that spawning and nursery grounds be included under Biodiversity, flora and fauna, as well as seafood included as a material asset under Objective 2 in table 7-1.

Yours sincerely,

Marine Divisions
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine