



February 19, 2026

RE: MUL2400005 - Allod Energy Ltd

A Chara,

The Marine Divisions of the Department of Agriculture, Food, and the Marine welcome the opportunity to provide comments on the *Marine Usage Licence Application MUL2400005 Reference no MUL2400005 Title of Application MUL2400005 – Allod Energy Ltd*.

Further to our letter of 18 March 2025, the Marine Divisions of the Department of Agriculture, Food and the Marine would like to take this opportunity to reiterate that commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment and it is essential that this is fully recognised as the proposed development of the Allod hydrogen storage project is being evaluated.

Fishers 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.

Vessel Monitoring Systems (VMS) data regarding fishing in, and around, the licence application 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 on board.

The AIMU Report notes that "given the short duration and temporary nature of the proposed site investigation activities, any potential effects on fishing are not expected to be significant." While the proposed 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 to avoid disruption where possible.

The Marine Institute have noted that "there is evidence of a range of permanent, non-permanent physical and behavioural impacts" of sub-seafloor geophysical surveys on marine biota, including fish, and while the direct impacts may be minor, they cannot be quantified for lack of research.

It is important to highlight that the developer's Fisheries Management and Mitigation Strategy that the residual effects of offshore activities on fishing activity can be reduced to a minor status following the deployment of relevant mitigation measures. DAFM considers, along with the marine agencies, that such effects on fishing activity in or near the proposed area of

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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development may be of far greater significance than envisaged, including the impacts on nursery and spawning grounds.

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 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) should be followed and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas.

DAFM welcomes the ongoing engagement the Fisheries Liaison Officer (FLO) is having with the fisheries and seafood sector, local communities, and stakeholders, and wish to acknowledge that the applicant has prepared a Stakeholder Engagement and Communications Plan (SECP) including a stakeholder directory, identifying stakeholders with potential interest in this MUL application, both an important and useful practice.

DAFM would urge that timely consultation and active engagement with fishing representatives continues to take place, to ensure optimum coordination of activities, to limit disturbance and avoid displacement which may increase fishing pressure and competition in other areas.

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.

Please also find attached documents from the Marine Institute (MI), Bord Iascaigh Mhara (BIM) and the Sea Fisheries protection Authority (SFPA) that were used to support and inform the DAFM submission, and which provide further specific items for consideration in this application.

Yours sincerely,

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food, and the Marine