Maritime Usage Licensing and Planning Advisory Directorate Response to Supplementary Material on a Minded to Determination			
To:	John Evans, Director	**From:**	Dr Ciar O'Toole Senior Marine Advisor
Date:	30/10/2026	**Maritime Usage Licence Application No:**	MUL240005
MUL Applicant Name:	Allod Energy Ltd.		
MUL Applicant Registered Address:	Clondargan, Stradone, Co. Cavan, H12NV06		
Licence application received:	19/09/2024	**Supplementary material received:**	16/10/2026
Type of maritime usage in accordance with Schedule 7 of the Maritime Area Planning Act, 2021 (as amended):	*7 (3). Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000.*		
Location of proposed Maritime Usage:	Celtic Sea (~65km south of the West Cork coast)		

Introduction:

The Maritime Area Regulatory Authority (MARA) issued a Minded to Determine Notice and a proposed Maritime Usage Licence (MUL) to Allod Energy Ltd. (the applicant) on 25/09/2026. The MUL application is for marine environmental surveys for the purposes of site investigation, falling under Schedule 7(3) of the Maritime Area Planning Act 2021, as amended (the MAP Act). The applicant was advised in the Notice that MARA was minded to grant the MUL, subject to conditions.

The applicant may, under Section 119(6)(b) of the MAP Act, submit supplementary material in relation to the reasons for the proposed licence conditions only.

The applicant submitted a response with supplementary information setting out their reasons for three "clarifications" as they term them, which do not strictly fall under the remit of a submission of supplementary material, and requested amendments to two of the conditions in the proposed MUL. This report addresses the supplementary material submitted, while also having regard to the application documentation and MARA's assessment reports. The applicant's supplementary material is briefly summarised below however the MARA website should be consulted to view the full details of the material submitted.

1. Clarification – Particulars Schedule

Applicant's request:
The applicant requests the company name be amended in the Particulars Schedule from "Allód Energy Ltd." to "Allod Energy Ltd" as the company name does not include a fada.

MARA's Response:
Although this request does not relate to a licence condition, it is a clerical error which can be corrected in the Final Licence.

Recommendation:
Amend company name to remove fada.

2. Clarification – Definitions

Applicant's request:
The applicant requests the removal of several definitions from the "Definitions" section as they are not referenced in their MUL.

MARA's Response:
This request also falls outside the remit of submitting supplementary material in relation to a proposed MUL. However, for clarification, the Definitions Section is standard in all MARA licences issued and no change is required.

Recommendation:
No change to Definitions Section

3. Clarification – Appendix 1: The Licenced Area

Applicant's request:
The applicant requests the amendment of the text on the chart presented in Appendix 1 which gives a licence area of 1,479.88km^2 to 1481km^2 to match the area they feel is presented in Appendix 1.

MARA's Response:
This request does not relate to the reasons for a licence condition and is a clerical change request. However, the map presented in Appendix 1 shows the verified area of the proposed MUL red line area which is 1,479.88km^2 as determined by MARA, therefore no change is required

Recommendation:
No change to Appendix 1

4. Condition 9.1 (i) and 9.1 (ii)

Without prejudice to the Holder's liability to indemnify the Grantor, the Holder shall:

(i) effect and keep in force a public liability insurance policy of indemnity in the joint names of the Grantor and the Holder in an insurance office licensed to operate in the State 12 MUL240005 Territory with a limit of € 6,500,000.00 (six million five hundred thousand euro) in respect of any one claim or a series of claims arising out of a single occurrence for any damage, loss or injury which may occur to any property (not being the property of the Grantor or the Holder) or to any person by or arising out of the admission of any person to the Licensed Area, and to extend such policy so that the Grantor is indemnified by the insurers in the same manner as the Holder;

(ii) effect and keep in force an employer's liability insurance policy of indemnity in the name of the Holder in an insurance office licensed to operate in the State Territory with a limit of €13,000,000.00 (thirteen million euro) for any one claim or a series of claims arising out

of a single occurrence and to extend such policy so that the Grantor is indemnified by the insurers in the same manner as the Holder in respect of all actions, costs, proceedings, losses, damages, or claims for personal injuries by employees of the Holder. This policy should include an indemnity to principles clause with a specific indemnity to the Grantor

Applicant's request:
The applicant requests that MARA replace "effect and keep in force" with "The Holder shall effect and keep in force for the duration of any mobilisation, activity, works or operations undertaken pursuant to the Licence, including associated demobilisation" to clarify that the activity-specific insurances are required only while the activities are undertaken.

MARA's Response:
Condition 9.1 (i) of the proposed Licence is a standard condition of Maritime Usage Licences. In this regard, no further consideration can be given by MARA. No change is recommended.

Condition 9.1 (ii) of the proposed Licence is a standard condition of Maritime Usage Licences. In this regard, no further consideration can be given by MARA. No change is recommended.

Recommendation:
No change to Condition 9.1 (i) and 9.1 (ii)

Specific Condition 28 -Fish spawning and nursery grounds:

The Holder shall not undertake the Permitted Maritime Usage between 1 st April & 31st May and 1 st August & 30th September annually, to ensure least disturbance at known fish and Nephrops (Dublin Bay prawn) spawning and nursery times.

Reason: To ensure protection of the marine environment.

Applicant's request:
The applicant states that imposing Condition 28 in its current wording would prohibit 4 months of a 6-month weather window. They feel that this exclusion is not supported by available scientific literature and will pose significant operational constraints that may lead to additional environmental emissions. A supplementary information report was submitted in relation to Specific Condition 28.

MARA's Response:

MARA accepts that the overlap between known nursery and spawning grounds for the eight fish species identified by MARA is relatively small in relation to their overall spawning and nursery areas.

However, the overlap between *Nephrops* grounds and the proposed licence area is larger and with a greater potential impact from the activities (Figure 1). Impulsive underwater noise (such as that produced by air guns) has been linked to mortality and injury in crustaceans and fish eggs and larvae in some cases. Behavioural changes have also been noted. However, a number of studies have also recorded no impacts after exposure to impulsive noise. Continuous noise, such as that produced by MBES and Side scan sonar also show a mixture of results, with some studies showing various impacts on mortality, rates of injury and behaviour, and some studies recording no impacts on the studied shellfish species at various life histories (Long et al., 2026).

Overall, the current evidence suggests that impulsive noise is most consistently associated with more severe effects, including injury, developmental abnormalities and occasional mortality for eggs and larvae and shellfish, with the evidence base for these outcomes coming mainly from seismic air gun studies. Continuous noise is more consistently associated with chronic sublethal effects including reduced reproductive success, with strongest relevance for shellfish (Long et al., 2026).

Given the short term nature of the air-gun portion of the project (approx. 20 days total), impulsive noise is of greater concern, which relates to the adult, egg and larval stages. Given the species life history and behaviour, the most sensitive life history stage is potentially that of mating, egg hatching and larval dispersal stages, all thought to occur primarily between late spring and early summer in Irish waters.

Therefore, MARA feels it is reasonable to amend Condition 28 to prevent the undertaking of the Permitted Maritime Usage between 1 st April & 30th June, but remove the restriction during August and September.



Figure 1: showing the overlap between Marine Institute identified *Nephrops* grounds (in green, with red dots showing identified *Nephrops* sightings) and the proposed licenced area (purple hatching).

Recommendation:

The Holder shall not undertake the Permitted Maritime Usage between 1 st April & 30th June annually, to ensure least disturbance to Nephrops (Dublin Bay prawn) spawning and larval settlement.

Reason: To ensure protection of the marine environment.

Senior Marine Advisor
Maritime Usage Licensing and Planning Advisory Directorate