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By email only [REDACTED]@galetechenergy.com and [REDACTED]@venterra-group.com

Date: 31/03/2026

Request for Additional Information: Section 117(3) of the Maritime Area Planning Act 2021

Re: Maritime Usage Licence Application Reference: MUL240005

Dear Applicant,

I refer to the above referenced maritime usage licence application received by the Maritime Area Regulatory Authority (MARA).

MARA considers that it requires additional information as set out below in order to determine the licence application.

1. With reference to the strict protection of species listed under Annex IV of the Habitats Directive (92/43/EEC), confirm if you are required to apply for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. If yes, provide details of the application submitted, including the NPWS Licence Derogation Number or application reference number.
2. The Assessment of Impact of the Maritime Usage (AIMU) states that "*The proposed survey will involve a 15m x 15m array of approximately 25 small airguns...*" (pg. 6), however the Risk Assessment for Annex IV Species states that "*The proposed survey will involve... 40 small airguns...*" (pg. 4). Please clarify the proposed number of small airguns to be used.
3. Data for the years 2014-2018 from Ireland's Marine Atlas (2021) were used to assess overlap between the proposed maritime usage and commercial fisheries as part of the Assessment of Impact of the Maritime Usage (AIMU) Report. However, more recent fisheries data is available from *The Atlas of Commercial Fisheries Around Ireland, 4th*

address:

An tÚdarás Rialála Limistéir Mhuiri / Maritime Area Regulatory Authority
2^ú hUrlár, Teach Menapia, Páirc Ghnó Dhraighní Draighneach Loch
Garman, Y35RF29.
2nd Floor, Menapia House, Drinagh Business Park, Drinagh, Wexford,
Y35RF29.

email:

licence@mara.gov.ie

website:

www.maritimeregulator.ie

*Edition*¹ (2024). Please provide an updated assessment of commercial fisheries overlap with the proposed maritime usage.

4. The Risk Assessment for Annex IV Species mentions the potential use of Acoustic Deterrent Devices (ADDs) to mitigate against possible impacts of the proposed maritime usage on marine mammals and reptiles. However, the use of ADDs has not been mentioned in the Supporting Information for Screening for Appropriate Assessment (SISAA) Report, or the Natura Impact Statement (NIS) provided.
 - a. Confirm if ADDs are proposed to be used
 - b. If so, provide additional information on the proposed use of ADDs, as follows:
 - i. Specify the activities within the proposed maritime usage for which ADDs are proposed to be used
 - ii. Indicate the focal species for which ADDs will be used
 - iii. Indicate the impacts for which ADDs will mitigate against (e.g. underwater noise, entanglement, etc.)
 - iv. Provide justification for the proposed use of ADDs
 - v. Indicate the type(s) of ADD to be used and provide full specification details for the equipment (including details on sound output levels)
 - vi. Provide a full methodology for the proposed ADD use in line with current relevant best practice guidance
 - vii. Where required, revise the Risk Assessment for Annex IV Species, the SISAA Report and the NIS, in light of the responses provided to a) and b) i-vi above

The requested information should be submitted to MARA within **4 weeks** of the date of this notice, i.e by **28/04/2026**, in order for MARA to assess the licence application.

Please direct any queries to licence@mara.gov.ie.

Yours faithfully,

Joanne Staunton
Maritime Usage Licensing Team
MARA

¹ <https://oar.marine.ie/entities/publication/d03c8fb2-d69e-48fd-bc61-963be7e49f6a>