

Maritime Usage Licensing and Planning Advisory Directorate

Maritime Usage Licence Assessment Report

To:	John Evans, Director	From:	Ross Fitzgerald, Marine Analyst
Date:	24/09/2026	Maritime Usage Licence Application No:	MUL240005
MUL Applicant Name:	Allód Energy Ltd.		
MUL Applicant Registered Address:	Clondargan, Stradone, Co. Cavan, H12NV06		
Licence application received:	19/09/2024		
Type of maritime usage activity in accordance with Schedule 7 of the Maritime Area Planning Act 2021:	<i>3. Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000.</i>		
Location of proposed maritime usage:	Celtic Sea (~65km south of the West Cork coast)		
Environmental Impact Assessment (EIA) Screening	EIA not required (EIA Screening Form dated 03/03/2026)		
1st request for additional information (RAI) issued:	07/04/2025	Response to 1 st RAI received	10/04/2025
2nd RAI issued:	31/03/2026	Response to 2 nd RAI received	27/04/2026
Notice requesting Natura Impact Statement (NIS) issued:	n/a	NIS received:	19/09/2024
Public body consultation:	19/01/2026 to 19/02/2026	Observations from public bodies received:	10
Public consultation:	12/05/2026 to 15/06/2026	Submissions from the public received:	None

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1. Background

Allód Energy Ltd. (the applicant) has applied to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence (MUL) to undertake marine environmental surveys for the purposes of site investigation, under Schedule 7(3) of the Maritime Area Planning Act 2021, as amended (the MAP Act). The proposed maritime usage is required to assess the suitability of an area in the Celtic Sea for potential hydrogen storage.

2. Location and Description of the Proposed Maritime Usage

The proposed maritime usage area is located approximately 65km south of the West Cork coast (Figure 1) and covers a total area of 1,481 km². The objective of the proposed surveys is to determine environmental conditions, and the seafloor and subsurface geological characteristics within the proposed maritime usage area. The proposed programme of site investigations to be undertaken is summarised in Table 1, with survey activities anticipated to take 20 days. The applicant has applied for a MUL duration of seven years to allow for weather related delays and delays in securing a contractor and survey vessel.

The proposed maritime usage area is located in an area of the Celtic Sea with approximate water depths of between 90-110m. The benthic broad habitat type is primarily deep circalittoral mud, with patches of deep circalittoral sand in the north and south of the proposed MUL area and some deep circalittoral coarse sediment at the western extent. The proposed MUL area is approximately 70 km southwest of the Government's South-Coast Designated Maritime Area Plan¹ for offshore renewable energy.

¹ [South Coast Designated Maritime Area Plan for Offshore Renewable Energy](#)

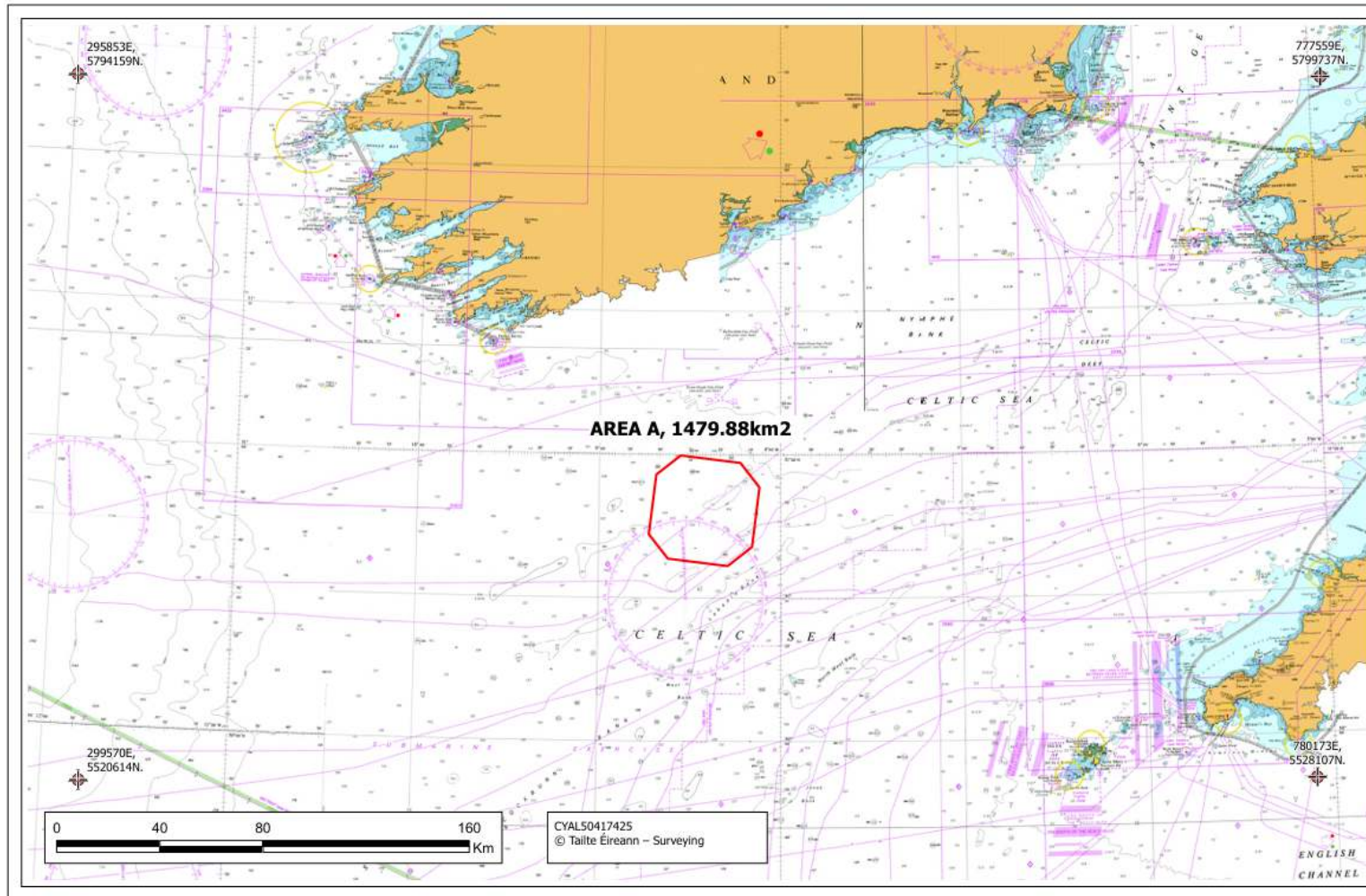


Figure 1 – Overview of the proposed maritime usage area

Table 1 – Summary of activities under the proposed maritime usage

Proposed maritime usage activities	Estimated timeframe for activities & maximum quantity (where relevant)
Geophysical - Airgun Array - Magnetometer - Sub-bottom Profiling (SBP) - Boomer - Sub-bottom Profiling (SBP) - Parametric Pinger - Sub-bottom Profiling (SBP) - Sparker - Multibeam Echosounder (MBES) - Ocean Bottom Nodes (OBN)	15mx15m array of approx. 40no. small airguns (2000 psi, 4500 in³ capacity) 10 no. streamers (8km length), with hydrophones, 100m between each streamer. Total width 1km, 10000 no. hydrophones in total May be undertaken across the full extent of the proposed maritime usage area May be undertaken across the full extent of the proposed maritime usage area May be undertaken across the full extent of the proposed maritime usage area May be undertaken across the full extent of the proposed maritime usage area May be undertaken across the full extent of the proposed maritime usage area May be undertaken across the full extent of the proposed maritime usage area May be deployed by ROV on the seabed at up to 500 locations across the full extent of the proposed maritime usage area Each OBN has dimensions of 200x155x70mm and has a weight of 2.5kg in seawater
Remote Operated Vehicle (ROV)	Will be used to deploy and recover the OBNs, if OBNs deployed
Ultra-short baseline (USBL)	May be used across the proposed maritime usage area to track the position of subsea equipment

3. Assessment

In assessing a MUL application, MARA must have regard to the criteria specified in the MAP Act, as discussed in this section.

3.1 National Marine Planning Framework (NMPF)

MARA must have regard to the Marine Planning Policy Statement (MPPS) which outlines the government's overarching vision, policies, and principles for managing the country's maritime area. MARA must also have regard to NMPF, which sets the framework for implementing the forward planning component of our marine planning system as set out in the MPPS.

The applicant has, as part of the Assessment of Impacts of the Maritime Usage report submitted in support of this application, identified and confirmed the relevant marine planning policies which apply to the proposed maritime usage. A number of environmental and sectoral activity policies detailed in the NMPF are covered in other sections of this report, including, but not limited to, the National Biodiversity Action Plan (NBAP), the Birds and Habitat Directives, the Water Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD) and Consideration of other maritime users.

Regarding the Key Sectoral Policies of the NMPF, the proposed maritime usage is consistent with Chapter 11, *Energy – Emerging Technologies (Carbon Capture and Storage, and Hydrogen)* and the policies within it. The applicant states that the provision of geological hydrogen storage can be part of an alternative offtake solution to non-grid connected offshore renewable energy developments. This offshore geological hydrogen storage can contribute significantly to the achievement of sustainability targets in both the transport and industrial sectors through the storage of green hydrogen as the raw material for sustainable fuels to be used in heavy goods transport, aviation and shipping.

Underwater Cultural Heritage

The NMPF includes a policy on heritage assets (Heritage Assets Policy 1). The policy supports the conservation of the historic environment and heritage assets both along the coast and in the underwater environment. The aim of the policy is to ensure that proposals in the marine environment do not have a detrimental impact on marine and coastal heritage assets. The applicant carried out a review of historic wrecks in support of the application and has stated that, if deployed, Ocean Bottoms Nodes will be placed at least 250m from any heritage assets. It is recommended that a condition be included in the Proposed Licence, if granted, to ensure that the proposed maritime usage will be carried out in accordance with those plans and particulars submitted with the application. In addition, it is recommended that a condition be included in the Proposed Licence, if granted, requiring the holder to consult with the Underwater Archaeology Unit of the Department of Housing, Local Government and Heritage prior to the commencement of the proposed maritime usage and to comply with their requirements in relation to underwater cultural heritage.

3.2 Environmental Impact Assessment Directive (2014/52/EU) (EIA Directive)

MARA carried out a screening for EIA of the proposed maritime usage, having considered Schedules 5 and 7 of the Planning and Development Regulations 2001. An EIA Screening Form was issued by MARA on 03/03/2026 and it was concluded that the proposed maritime usage does not fall within the scope of the EIA Directive and therefore an EIA is not required.

3.3 National Biodiversity Action Plan (NBAP)

Ireland's 4th National Biodiversity Action Plan sets the national biodiversity agenda for the period 2023–2030. The objectives of the NBAP focus on the conservation and restoration of biodiversity. Objective 2 of the NBAP is to meet urgent conservation and restoration needs. Part of its focus is to elevate efforts to tackle invasive alien species. It is recommended that a condition be included in the Proposed Licence, if granted, to address the potential risks from invasive alien species as a result of the proposed maritime usage. Sections 3.5–3.8 of this report also address the WFD, MSFD and the Habitats and Birds Directives and recommend conditions to minimise impacts on biodiversity from the proposed maritime usage.

3.4 Climate Action and Low Carbon Development Act 2015, as amended

Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended (the 'Climate Act') requires relevant bodies, including MARA, to perform their functions in so far as practicable in a manner consistent with the governance framework set out therein. The Act sets legally binding targets for the reduction of greenhouse gases by 2030 and net-zero emissions by 2050. Considering the temporary nature of the proposed maritime usage, no significant increases in carbon emissions are expected to be produced.

As the proposed maritime usage aims to assess an area in the Celtic Sea for potential hydrogen storage, the applicant states that the proposed maritime usage will contribute to achieving the objectives set out in the Climate Action Plan. Large scale hydrogen storage will be required to ensure that Ireland can deliver on decarbonisation and renewable energy targets as part of an alternative offtake solution to non-grid connected offshore renewable energy developments.

3.5 Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) requires EU member states to protect and improve water quality in all waters to achieve at least good ecological status in inland surface waters, transitional waters, coastal waters and groundwater by 2027, at the latest. The ecological status of coastal waterbodies is based on the assessment of biological quality elements (phytoplankton, benthic invertebrates, macroalgae, angiosperms) as well as supporting chemical (specific pollutants), physico-chemical (e.g. temperature, salinity, nutrients) and hydromorphological quality elements.

As the proposed maritime usage will take place over 60 km from the closest waterbody, the Western Celtic Sea (HAs 18;19;20) coastal waterbody, it will not have a significant effect on water quality of inland, transitional and coastal surface waters and/or groundwaters. As part of the survey, OBNs may be deployed on the seafloor for the duration of the survey. A small amount of sediment disturbance can be expected during deployment and retrieval at each location. However, the effect will be very localised and considering the distance from the nearest coastal waterbody will not have a significant effect on water quality of inland, transitional and coastal surface waters and/or groundwaters. Notwithstanding this, it is recommended that a condition be included in the Proposed Licence, if granted, relating to the preparation of an oil pollution emergency plan to mitigate for any accidental introduction of contaminants to the marine environment.

3.6 Marine Strategy Framework Directive (2008/56/EC)

The Marine Strategy Framework Directive (MSFD) sets the framework for European marine environmental policy. It aims to achieve Good Environmental Status (GES) for all marine waters in Europe and protect the resource base for marine related economic and social activities. Ireland's 2024 assessment² under Article 8 of the MSFD sets out the status of the 11 qualitative descriptors that describe the state of the marine environment. Table 2 sets out the status of the relevant descriptors and assesses the potential impacts of the proposed maritime usage. Subject to the mitigation described in Table 2, the status of the descriptors will not be negatively impacted from the proposed activities.

² [Ireland's Marine Strategy Part 1: Article 8, 9 and 10 report 2024.](#)

Table 2 - Assessment of impact of the proposed maritime usage on MSFD descriptors

MFSD Descriptor	Good Environmental Status achieved	Assessment
Biological diversity	Partially achieved	MARA has undertaken an Appropriate Assessment (AA) in respect to the proposed maritime usage (see Section 3.8). Mitigation measures have been identified and are recommended to be included in the Proposed Licence, if granted, which address potential impacts on marine mammals.
Non-indigenous species	Yes	To ensure that the proposed maritime usage will not result in the unintended introduction of non-indigenous species, a condition is recommended to be included in the Proposed Licence, if granted, relating to the control of invasive species.
Population of commercial fish/shellfish	Partially achieved	Given its location, the proposed maritime usage is a considerable distance from any aquaculture or fishery order areas and so will not have any impact on these. However, the proposed maritime usage area overlaps with a number of known fish spawning (Haddock, Horse Mackerel, Megrim) and nursery areas (White- and Black-bellied Anglerfish, Hake, Horse Mackerel, Megrim). Underwater noise generated as a result of the proposed geophysical surveys has the potential to have a negative impact on commercial fish and <i>Nephrops</i> populations in the proposed maritime usage area, particularly at vulnerable stages of their life history. It is recommended that a condition be included in the Proposed Licence, if granted, to minimise potential impacts on commercial fish and shellfish populations by avoiding peak spawning and nursery periods (1 st April to 31 st May and 1 st August to 30 th September annually).
Marine food webs	Unclear	Underwater noise generated as a result of the proposed geophysical surveys has the potential to have a negative impact on fish and shellfish species in the proposed maritime usage area. These species may form part of important marine food webs. It is recommended that a condition be included in the Proposed Licence, if granted, to minimise potential impacts on fish and shellfish species by avoiding peak spawning and nursery periods (1 st April to 31 st May and 1 st August to 30 th September annually).

		September annually). With mitigation, the balance and diversity in marine food webs is not expected be impacted as a result of the proposed maritime usage.
Eutrophication	Yes	The proposed maritime usage does not involve the addition of nutrients to the marine environment and as such will not impact this descriptor achieving GES.
Sea-floor integrity	Partially achieved	The seabed in the MUL application area will experience temporary disturbance due to the installation and retrieval of Ocean Bottom Nodes (OBNs), if deployed. The applicant states that OBNs are compact, self-contained units that can be deployed and retrieved without extensive seabed disruption. When placed on the seabed, each node will only displace a minimal amount of sediment, which quickly resettles around the node. This limited disturbance is localised and temporary. Deployment of the OBNs will be by means of remotely operated vehicles (ROVs) to ensure precise placement and collection, reducing the likelihood of disturbing the sediment. OBNs will be deployed for relatively short periods. It is not expected that the proposed maritime usage will negatively impact on the GES status of this descriptor.
Alteration of hydrographical conditions	Yes	The proposed maritime usage will not alter the hydrographical conditions in the proposed maritime usage area.
Concentrations of contaminants	Yes	It is recommended that a condition be included in the Proposed Licence, if granted, relating to the preparation of an oil pollution emergency plan to mitigate for any accidental introduction of contaminants to the marine environment. Given the nature and duration of the proposed maritime usage, it is not expected that the maritime usage will negatively impact on the GES status of this descriptor.
Contaminants in fish/seafood for human consumption	Yes	The proposed maritime usage will not result in the introduction of contaminants in fish or seafood and therefore, will not impact on the GES status of this descriptor.
Marine Litter	No	The proposed maritime usage will not result in the introduction of marine litter to the marine environment and thus will not impact on the achievement of GES status of this descriptor. It is recommended that a condition be included in the Proposed Licence, if granted, requiring the

		holder to remove all plant and equipment associated with the proposed maritime usage and to restore the licensed area to its original condition.
Introduction of energy including underwater noise	Yes	The impacts of underwater noise introduced as a result of the proposed maritime usage are assessed in Section 3.7 and 3.8 of this report. It is recommended that a condition relating to management of underwater noise disturbance in relation to marine mammals, be included in the Proposed Licence, if granted. In order to inform the data collected as part of MSFD requirements, it is recommended that the holder should provide details of all acoustic surveys to the Marine Environment section of the relevant government department in the reporting format of the OSPAR Impulsive Noise Registry.

3.7 Annex IV species

Articles 12 and 13 of the Habitats Directive (92/43/EC) impose obligations on Member States to establish a system of strict protection for animal and plant species listed on Annex IV of the Directive. The applicant submitted a Risk Assessment for Annex IV Species (RAAIVS) report in support of the MUL application and in line with national guidance on underwater noise³. The risk assessment considered the scope of the proposed maritime usage, the relevant Annex IV species (cetaceans and turtles) and the potential impacts of the proposed maritime usage on those species. The applicant considered underwater noise disturbance, entanglement risk (with towed geophysical equipment), collision risk and mortality/injury due to a pollution event to be the impacts most likely to have a potential effect on Annex IV species in the proposed maritime usage area.

Regarding collision risk for marine mammals and turtles, the applicant states that the vessels undertaking the geophysical surveys will be travelling at less than 5 knots while engaged in the survey activities, thus allowing both the vessel and any animals in the area time to avoid collision. The applicant also states that the predictable trajectory of geophysical survey vessels has an additional benefit of further reducing the risk of collision with marine mammal species.

In assessing the risk of entanglement with airgun arrays the applicants RAAIVS report considered that the risk of entanglement with airgun arrays is generally low. The applicant states that the survey vessel will be moving at a maximum speed of approximately 5 knots and following a predictable trajectory, allowing cetaceans the opportunity to anticipate and avoid the vessel's path. To minimise the likelihood of any potential impacts, the applicant has stated that they will implement the following mitigation:

- Standard mitigation measures (including a marine mammal observer), in line with national guidance on underwater noise.
- Utilizing passive acoustic monitoring (PAM) to detect the presence of marine species in the vicinity of the airgun array. If any species are detected within the relevant mitigation zone, a delay in the commencement of acoustic input will be implemented.

In relation to mortality/injury as a result of a pollution event, the applicant considered that while the site investigation activities will raise the risk of accidents and resultant fuel spills, the likelihood of pollution occurring (from operational activities or accidental incidents) is low. The applicant states that strict protocols will be followed for refuelling at sea, including the use of specialized equipment to minimize the risk of spills or leaks. All refuelling

³ [Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters. Department of Housing, Local Government and Heritage, 2014](#)

operations will be supervised by experienced personnel and carried out in favourable weather conditions to reduce the potential for accidents. Additionally, an emergency response plan will be in place. Vessels used during the survey campaign will be compliant with the International Convention for the Prevention of Pollution from Ships (MARPOL) and fully certified by the Maritime Safety Office (where required). Therefore, it is not likely that there would be any occurrence of a pollution event either accidental or otherwise that could directly or indirectly affect any Annex IV Species.

With reference to underwater noise disturbance, the applicant provided an assessment of the potential impacts of the proposed geophysical surveys on cetaceans (and their prey) and turtles. Given the marine mammal injury criteria proposed by Southall *et al.*, 2019⁴, the proposed geophysical survey equipment has the potential to cause injury or disturbance to Annex IV species if they were present during the surveys in the proposed maritime usage area. Effective mitigation will be required to avoid such impacts on these species. It is recommended to include conditions in the Proposed Licence, if granted, relating to:

- The requirement for the applicant to strictly adhere to the national guidance to manage the risk from underwater noise to marine mammals;
- The carrying out of the proposed maritime usage in accordance with those plans and particulars submitted with the application;
- The preparation of an oil pollution emergency plan to mitigate for any accidental introduction of contaminants to the marine environment.

The applicant has stated that a derogation licence from the National Parks and Wildlife Service (NPWS) under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, is required for the proposed maritime usage. The Minister for Housing, Local Government and Heritage granted a derogation (**DER-CETACEAN-2027-01**) to the applicant, in respect of Annex IV marine species, on 18/09/2026, for the period 01st April to 30th September 2027 inclusive. The derogation licence states that the action authorised by the derogation will not be detrimental to the maintenance of the population of whale, dolphin, turtle or porpoise at favourable conservation status in their natural range. All MULs include a standard condition specifying that the MUL does not negate the Holder's statutory obligations or requirements under any other law. Thus, the applicant will have to ensure that any further licence requirements from the NPWS in relation to Annex IV species are obtained as required during the duration of the MUL.

⁴ <https://www.aquaticmammalsjournal.org/article/vol-45-iss-2-southall/>

3.8 Appropriate Assessment

The Habitats Directive (92/43/EC) and the Birds Directive (2009/147/EC) are transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011, as amended (the Regulations) and by Part XAB of the Planning and Development Act 2000. The application was subject to screening for appropriate assessment (AA) by MARA in accordance with the Regulations. MARA made an AA Screening Determination on 05/05/2026 which concluded that the proposed maritime usage will require Stage 2 AA as it could not be excluded, on the basis of objective scientific information, that the proposed project, either individually or in-combination with other plans or projects, will have a significant effect on European sites.

Seven Special Areas of Conservation (SACs) were screened in for appropriate assessment by MARA. No Special Protection Areas were screened in for Appropriate Assessment. These SACs, their Qualifying Interests (QIs) and likely or potential sources of impact as a result of the proposed maritime usages are given in Appendix 1. The applicant submitted a Natura Impact Statement (NIS) in support of the application, dated 17/09/2024.

3.8.1 Assessment of Likely/Potential Impacts on European Sites

The AA Screening Determination identified the potential for survey activities to generate underwater noise at a level that could cause disturbance, displacement or harm (PTS or auditory injury (TTS)) that could adversely affect the mobile marine mammal QIs of the SACs listed in Appendix 1.

Marine mammals depend on sound for a wide range of functions including navigation, perception of their environment, communication, prey identification and capture, and the detection of predators. Given the marine mammal injury criteria proposed by Southall *et al.*, 2019⁵, the geophysical survey equipment to be used in the proposed maritime usage could interfere with these functions by inducing permanent auditory injury (or Permanent Threshold Shift (PTS)) at very close range or temporary hearing impairment (or Temporary Threshold Shift (TTS)) and disturbance at further distances from the noise source. Therefore, the measures listed in Section 3.8.3 will be required to mitigate against these potential significant effects. Taking into account these proposed mitigation measures there will not be significant adverse impacts on marine mammal populations at these SACs.

3.8.2 Assessment of In-combination effects

The potential impacts of the proposed maritime usage must be considered individually and also in combination with other plans or projects. All types of plans or projects that could, in-combination with this application, have a significant effect, have been considered. This in-

⁵ <https://www.aquaticmammalsjournal.org/article/vol-45-iss-2-southall/>

combination assessment has been undertaken using professional and scientific judgement and is assessed primarily in terms of potential spatial and temporal impacts. Table 3 below outlines the potential sources of impact that could act in-combination with the proposed maritime usage.

The spatial scope of the in-combination assessment (20km) is based on the maximum distance of underwater noise generated by the airgun array equipment and the Effective Deterrence Range⁶ of Harbour porpoise which is most sensitive to underwater noise. The temporal scope of the in-combination assessment is based on the period over which the maritime usage is proposed. The applicant has applied for a seven-year licence and thus the temporal scope is seven years.

Table 3 - Potential sources of impact that could act in-combination with the proposed maritime usage

Impact	Potential Cumulative Pathway
Underwater noise disturbance, displacement or harm (PTS or auditory injury) from survey activities	Potential for underwater sound sources from survey activities to be at a level and duration that would cause a significant negative impact on marine mammals.

Prediction:

The magnitude and extent of identified likely cumulative effects have been predicted below.

Underwater noise disturbance, displacement or harm (PTS or auditory injury) from survey activities

There is the potential for increased underwater noise disturbance effects on marine mammals if other relevant projects, capable of producing similar underwater noise sources, were to take place within 20km of the proposed maritime usage and at the same time.

Identification of Plans or Projects that could act in combination

A search was carried out on 23/09/2026 of relevant databases (including EPA, *An Coimisiún Pleanála*, Foreshore Unit, MARA, planning authorities) for other plans and projects with characteristics that may cause in-combination effects with the proposed maritime usage on

⁶ Effective Deterrence Range – the radius of a circular area assumed to be disturbed (see [JNCC Report 803](#))

the QIs of the European sites identified in Appendix 1. No other projects were found to have the potential to act in combination with the proposed maritime usage

The following plans were identified as having the potential to result in in-combination effects.

- The Climate Action Plan 2025,
- The South Coast Designated Maritime Area Plan, 2024

These plans promote sustainable development and integrated management planning in the maritime environment. It is unlikely that any of these plans will result in a negative in-combination effect on the conservation objectives of the identified European sites.

In-Combination Effects Assessment conclusion

Given that no other projects were found to have the potential to act in combination with the proposed maritime usage and the plans listed above are unlikely to result in negative in-combination effects on the conservation objectives of the identified European sites, significant in-combination effects can be excluded for the proposed maritime usage.

3.8.3 Mitigation measures

The most up to date national underwater noise guidance must be adhered to for all geophysical activities, including the relevant monitored zones for the particular geophysical surveys being undertaken.

Marine Mammals

- (i) The Holder shall appoint a marine mammal observer(s) for the purposes of overseeing the Permitted Maritime Usage. The Holder shall ensure the marine mammal observer(s) shall satisfy the requirements of the most up to date national guidance. During the activity the Holder shall comply with the directions of the marine mammal observer(s).
- (ii) The Holder shall implement risk control and mitigation measures for marine mammals in strict accordance with the most up to date national guidance.
- (iii) The Holder shall, within 30 days of completion of the Permitted Maritime Usage, and within 30 days of the completion of each stage of site investigation requiring a marine mammal observer, forward a report of the marine mammal observer(s) operations and mitigation undertaken, to offshore@npws.gov.ie and compliance@mara.gov.ie
- (iv) The Holder shall publish the report and recording and data forms on their website within 60 days of completion of the Permitted Maritime Usage, and each stage of site investigation requiring a marine mammal observer, unless otherwise agreed with the Grantor.

3.8.4 Residual effects

This assessment has identified likely/potential significant impacts on European Sites and their conservation interests in Section 3.8 and recommends mitigation measures as conditions to be included in the Proposed Licence, if granted. It is considered that the mitigation measures described and their implementation through licence conditions will remove, or reduce to imperceptible levels, all negative impacts and that residual effects will not arise.

3.8.5 Assessment of Transboundary effects

The mitigation measures proposed as part of this appropriate assessment will mitigate against any transboundary effects on other European sites.

3.8.6 Appropriate assessment conclusion

The appropriate assessment screening process identified likely/potential significant impacts due to underwater noise disturbance, displacement or harm (PTS or auditory injury) from survey activities. Likely significant impacts from the proposed maritime usage could not be ruled out, beyond reasonable scientific doubt, without mitigation. The potential for in-combination effects from the proposed maritime usage with other plans and projects could be ruled out, beyond reasonable scientific doubt.

Mitigation measures were identified to ensure that impacts on European sites and their QIs do not occur. Therefore, with adherence to the mitigation measures specified in Section 3.8.3 and in view of best scientific knowledge, and of the sites' conservation objectives, the project, individually, or in-combination with other plans or projects, will not have adverse effects on European sites. The appropriate assessment determination is included in Section 10.

4. Consideration of other maritime users

MARA has had regard to the rights of other users as set out in Section 3 (3)(b) of the MAP Act. Given the location of the proposed maritime usage, it is unlikely to affect recreational maritime users to any significant degree. The potential effects on marine traffic include an increased risk of collision with the survey vessels and/or the survey equipment. The applicant states that other vessels will be asked to maintain a safe distance, in keeping with accepted maritime safety practices during survey activities. In addition, the survey vessel will be accompanied by two guard vessels who will patrol the waters around the survey vessel to mitigate against collision with other marine traffic.

The applicant has provided an assessment of the overlap between the proposed maritime usage and fishing activity, with beam and bottom otter trawling and seine netting most likely to be affected. Notably, the proposed licence area overlaps with important *Nephrops* (Dublin Bay Prawn) fishing grounds. There is significant potential for the proposed maritime usage to temporarily impact fishing activity (and other vessel users) during the geophysical surveys and

as a result of the possible deployment of up to 500 Ocean Bottom Nodes (OBNs) on the seabed.

In particular, the proposed airgun array survey will temporarily take up a large area of the sea surface and seabed during survey operations. The proposed survey will involve a 15m x 15m array of approximately 40 small airguns towed by the survey vessel. These airguns will emit low frequency sound which is returned from the seabed and subseafloor and is recorded by the OBNs (if deployed on the seabed) and by a series of hydrophones encased within streamers which are towed behind the airgun array. The survey is anticipated to utilise 10 streamers, each up to 8 km in length, with a 100 m spacing between each streamer, giving a total width of 1 km and total length of up to 8 km. The applicant has stated that during the proposed site investigation activities, other vessels will be requested to maintain a safe distance from the survey vessels due to their restricted manoeuvrability. They also state that fishers will be requested to avoid the static OBN survey equipment once it is deployed on the seabed. The application documentation indicates that the OBNs would be in place for the duration of the geophysical marine site investigation activities (approx. 3 weeks).

The proposed maritime usage area contains three known international submarine cables, and the applicant has stated that if deployed, OBNs will be placed at least 250 m from subsea cables in the proposed maritime usage area.

In order to ensure fishers and other vessel users are notified of the proposed maritime usage and to minimise the impacts of the proposed maritime usage on other maritime users, the following conditions are recommended to be included in the Proposed Licence, if granted:

- A condition in respect of the requirement to publish a marine notice via the Marine Safety Division of the Department of Transport, prior to the commencement of activities.
- A condition ensuring that the holder of the licence, if granted, does not damage or interfere with any third party's property
- A condition to appoint a Fisheries Liaison Officer (FLO)
- A condition to ensure that the proposed maritime usage will be carried out in accordance with those plans and particulars submitted with the application

5. Site visit

No site visit was undertaken due to the offshore location of the proposed maritime usage.

6. Public body consultation

Observations on the MUL application were invited from relevant public bodies to ensure that MARA takes account of all other relevant maritime usages and interests in the application area. Ten responses were received. The following tables summarise the observations from public bodies with a response given below each submission summary. The MARA website should be consulted to view the full details of the observations received.

1. Observations summary – Marine Survey Office (MSO)

A submission was received on 19/01/2026 from the MSO, which states that they have no objection to the proposed maritime usage from a navigational safety perspective. The MSO notes that the proposed maritime usage area contains three known international submarine cables and that the licensee shall ensure all precautions to avoid interference, disruption and damage to these cables.

The MSO recommended conditions to be applied to the licence if granted, which relate to:

1. The requirement for a marine notice to be issued
2. The requirement for *Navtex* and radio broadcast warnings
3. Navigational safety
4. The need to liaise with the MSO and Commissioner for Irish Lights (CIL) regarding the marking and lighting of any moored instruments
5. The need for vessels to be suitably certified
6. The need to notify the MSO if Maritime Autonomous Surface Ships are to be deployed
7. The particulars of information to be provided to the UK Hydrographic Office (UKHO) and INFOMAR

MARA Response:

MARA notes the observations of the MSO. It is recommended that conditions be included in the Proposed Licence, if granted, in respect of the requirement to publish marine notices, the need for vessels to conform with the requirements of Irish certification standards, the need to provide information to the UKHO and INFOMAR, where relevant, and to not damage or interfere with any third party's property while carrying out the Permitted Maritime Usage. In addition, MARA is required to have regard to the rights of the public or any class of the public over the foreshore in relation to navigation and navigational safety – this requirement has been incorporated into MARA's overall assessment of the licence application.

2. Observations summary – Department of Agriculture, Food and the Marine (DAFM)

Submissions were received on 18/03/2025 and 19/02/2026 from DAFM, which along with its own comments, summarises comments and observations from the Marine Institute, Bord Iascaigh Mhara and Sea Fisheries Protection Authority. These are made in more detail in these agencies' separate submissions and are considered under the relevant separate headings in this section of the report.

In their submission dated 18/03/2025, DAFM state that:

- The sea-fishing and aquaculture sectors should be fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment within the context of the assessment of the proposed maritime usage.

- 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).
- Early and ongoing consultation with the fishing industry continues, so as to ensure minimum impacts on the seafood industry.
- 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.

In their submission dated 19/02/2026, DAFM reiterate the above points and further note the following:

- 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.
- Relevant local fishing organisations should be included on the provision of any Notices to Mariners and be made aware of proposed works at the earliest opportunity.
- Effects on fishing activity in, or near the proposed area of development may be of far greater significance than envisaged, including the impacts on nursery and spawning grounds.

MARA response:

MARA notes the issues raised by DAFM. The potential impacts of the proposed maritime usage on fish and fisheries have been assessed in Sections 3.6 and 4 of this report. Regarding potential impacts of the proposed maritime usage on fish spawning and nursery grounds, it is recommended that a condition relating to this is included in the Proposed Licence, if granted. To minimise impacts on fishing activity, it is recommended that a condition to appoint an FLO be included in the Proposed Licence, if granted.

3. Observations summary – Bord Iascaigh Mhara (BIM)

Submissions were received on 16/12/2024 and 12/02/2026 from BIM, which notes that the proposed MUL area overlaps with nursey grounds for monkfish, hake, horse mackerel and megrim, as well as spawning areas for horse mackerel, haddock and whiting. BIM also notes that the proposed MUL area also overlaps with areas of beam trawl, and bottom otter trawl and seine fishing activity and that more recent fisheries data available from the Marine Institute should be used to provide a more up to date assessment of fisheries overlap.

MARA response:

MARA notes the observations of BIM. The potential impacts of the proposed maritime usage on fish and fisheries have been assessed in Sections 3.6 and 4 of this report. Regarding potential impacts of the proposed maritime usage on fish spawning and nurse grounds, it is recommended that a condition relating to avoiding peak spawning and nursery periods is included in the Proposed Licence, if granted. Regarding the use of more recent fisheries data to assess the overlap of the proposed maritime usage and fishing activity, following a Request for Additional Information (issued by MARA on 31/03/2026), the applicant has provided an updated assessment of fisheries overlap on 24/04/2026, using the most up to date fisheries data available. To minimise impacts on fishing activity, it is recommended that a condition to appoint an FLO be included in the Proposed Licence, if granted.

4. Observations summary – Marine Institute (MI)

A submission was received on 17/01/2025 from the MI, noting the overlap between the proposed MUL area and beam trawl, bottom trawl and seine fishing activity, as well as overlap with haddock, hake, horse mackerel, megrim, and white-bellied anglerfish spawning grounds. The MI notes that the size of the application area is relatively small compared to the area in which these species spawn. The MI also highlights a possible overlap with the Labadie, Jones & Cockburn *Nephrops* fishing grounds.

The application does not mention a plan to conduct a cumulative effects assessment (CEA), nor any CEA methods or approaches. The MI recommends that this and other such MUL applications be evaluated in the wider context of proper marine planning and existing activities in Irish waters and the wider Celtic Sea basin specifically.

The MI also raises concerns around the effects of underwater noise generated by the proposed maritime usage on fish, shellfish, cetaceans and benthic life.

MARA response:

MARA notes the issues raised by the MI and agrees with the point regarding further work on cumulative effects across the ecosystem as a whole. The potential impacts of the proposed maritime usage on fish and fisheries have been assessed in Sections 3.6 and 4 of this report. Regarding potential impacts of the proposed maritime usage on fish spawning and nurse grounds, it is recommended that a condition requiring avoidance of peak spawning and nursery periods is included in the Proposed Licence, if granted. To minimise impacts on fishing activity, it is recommended that a condition to appoint an FLO be included in the Proposed Licence, if granted.

Regarding potential cumulative effects, a condition is recommended to be included in the Proposed Licence, if granted, to address the duplication of survey effort in the proposed

maritime usage area. Section 3.8.2 of this report also considers in-combination impacts for relevant habitats and species.

5. Observations summary – Sea Fisheries Protection Authority (SFPA)

A submission was received dated 29/01/2026 from the SFPA, noting that the proposed maritime usage is located in an area extensively used by the fishing industry year-round for both crustacean and demersal fisheries. The SFPA also notes that given its offshore location, the proposed maritime usage will not have an impact on shellfish production areas, or on seafood safety.

MARA response:

MARA notes the observations of the SFPA. The potential impacts of the proposed maritime usage on fish and fisheries have been assessed in Sections 3.6 and 4. Regarding potential impacts of the proposed maritime usage on fish spawning and nurse grounds, it is recommended that a condition relating to this is included in the Proposed Licence, if granted. The inclusion of a Fisheries Liaison Officer (FLO) is also recommended as a condition in the Proposed Licence, if granted.

6. Observations summary – Dept. Housing, Local Government and Heritage (DHLGH)

A submission was received on 24/02/2026 from the Development Applications Unit (DAU) of DHLGH incorporating observations from The National Monuments Service (NMS). With regard to underwater archaeology, the NMS provides recommendations and a number of suggested conditions in relation to underwater archaeology to be applied to the Proposed Licence, if granted.

MARA response:

MARA notes the content of the submission from the DAU of DHLGH in relation to underwater archaeology. A condition is recommended to be included in the Proposed Licence, if granted, requiring the holder to consult with the Underwater Archaeology Unit of the Department of Housing, Local Government and Heritage prior to the commencement of the proposed maritime usage and to comply with their requirements in relation to underwater cultural heritage.

7. Observations summary – Geological Survey Ireland (GSI)

A submission was received on 04/02/2026 from GSI recommend the use of their various data sets when conducting the EIAR, SEA, planning and scoping processes for any developments, plans and policies.

MARA response:

MARA notes the comments from GSI, however the proposed maritime usage is for Schedule 7(3) site investigations only, and EIAR, SEA and planning are not applicable.

8. Observations summary – Commissioners of Irish Lights (CIL)

A submission was received on 03/02/2026 from CIL stating they have no objection to the granting of a licence for the proposed maritime usage from a safety of navigation perspective.

MARAs response:

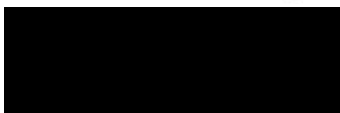
MARA notes the submission from CIL.

8. Public Consultation

A public consultation was undertaken between 12/05/2026 and 15/06/2026, under Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 and under section 117(6)(b) of the MAP Act. No submissions were received.

9. Recommendation

Having considered the information submitted in support of the application, I recommend that a Maritime Usage Licence in accordance with the criteria specified in the Maritime Area Planning Act, 2021, as amended, be granted to **Allód Energy Ltd., Clondargan, Stradone, Co. Cavan, H12NV06**, for the purposes of marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000, subject to the conditions in the Proposed Licence. Given the maximum proposed duration of the activities is 20 days, it is recommended that a licence be granted for a period of five years, in line with the intent of the MAP Act that licences be granted for the purposes of activities that will be undertaken for relatively short periods of time.

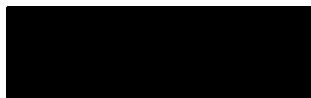
Signed:	
Prepared by:	Ross Fitzgerald Marine Analyst
Date:	24/09/2026

10. Appropriate Assessment Determination

Having considered:

- the application information submitted by the applicant;
- observations received further to public body consultation;
- this *Maritime Usage Licence Assessment Report*,

together with my own assessment, it can be concluded, and I determine, for the purposes of Article 6(3) of the Habitats Directive (92/43/EEC) and Regulation 42(11) of the European Communities (Birds and Natural Habitats Regulations) 2011 that the proposal to carry out **marine environmental surveys for the purposes of site investigation in the Celtic Sea, 65km south of The Old Head of Kinsale (MUL240005)** (either individually or in combination with any other plans or projects), will not adversely affect the integrity of any European sites, in view of the sites' conservation objectives, subject to the implementation of the mitigation measures specified in the foregoing **Section 3.8 – Appropriate Assessment**. These mitigation measures are included in the Proposed Licence and must be incorporated into any consent that may be granted in respect of the respective maritime usage licence application.

Signed:	
Approved and determined by:	John Evans Director of Maritime Usage Licensing
<u>Date:</u>	<u>25/09/2026</u>

11. Appendix 1

European sites and qualifying interests which were screened in for appropriate assessment along with potential source of impact and site-specific conservation objectives.

European site & site code	Distance from proposed MUL area (km)	List of Qualifying Interests	Connections (Source-pathway-receptor)	Site-specific conservation objectives
Roaringwater Bay and Islands SAC [000101]	75-100	<i>Phocoena phocoena</i> (Harbour Porpoise) [1351] <i>Halichoerus grypus</i> (Grey Seal) [1364]	Possible disturbance, displacement or harm (PTS ⁷ or auditory injury) from underwater noise	NPWS (2011) Roaringwater Bay and Islands SAC [000101]. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Kenmare River SAC [002158]	>100km	Harbour Porpoise (<i>Phocoena phocoena</i>) [1351]	Possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	NPWS (2026) Kenmare River SAC [002158]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Hook Head SAC [000764]	>100	<i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349] <i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	NPWS (2025) Hook Head SAC [000764]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

⁷ Permanent Threshold Shift

Carnsore Point SAC [002269]	>100	<i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	NPWS (2024) Carnsore Point SAC [002269]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Blasket Islands SAC [002172]	>100	<i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	NPWS (2014) Blasket Islands SAC [002172]. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Blackwater Bank SAC [002953]	>200	<i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	NPWS (2024) Blackwater Bank SAC [002953]. Version 3.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Belgica Mound Province SAC [002327]	>200	<i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349] <i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	NPWS (2025) Belgica Mound Province SAC [002327]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.