

## Maritime Usage Licence and Planning Advisory Directorate

### Appropriate Assessment Screening and Determination Report

<b>To:</b>	John Evans, Director	<b>From:</b>	Ross Fitzgerald Marine Analyst
<b>Date:</b>	01/05/2026	<b>Maritime Usage Licence Application No:</b>	MUL240005
<b>Applicant:</b>	Allód Energy Ltd., Clondargan, Stradone, Co. Cavan, H12NV06		
<b>Type of maritime usage activity in accordance with Schedule 7 of the Maritime Area Planning Act 2021:</b>	<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>		
<b>Location of proposed maritime usage:</b>	Celtic Sea (~65km south of the West Cork coast)		
<b>Licence application received:</b>	19/09/2024		

**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, falling under Schedule 7(3) of the Maritime Area Planning Act 2021 (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. Description of maritime usage and local site characteristics**

**2.1 Brief description of the 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 km<sup>2</sup>. 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 7 years to allow for weather related delays and delays in securing a contractor, survey vessel, etc.

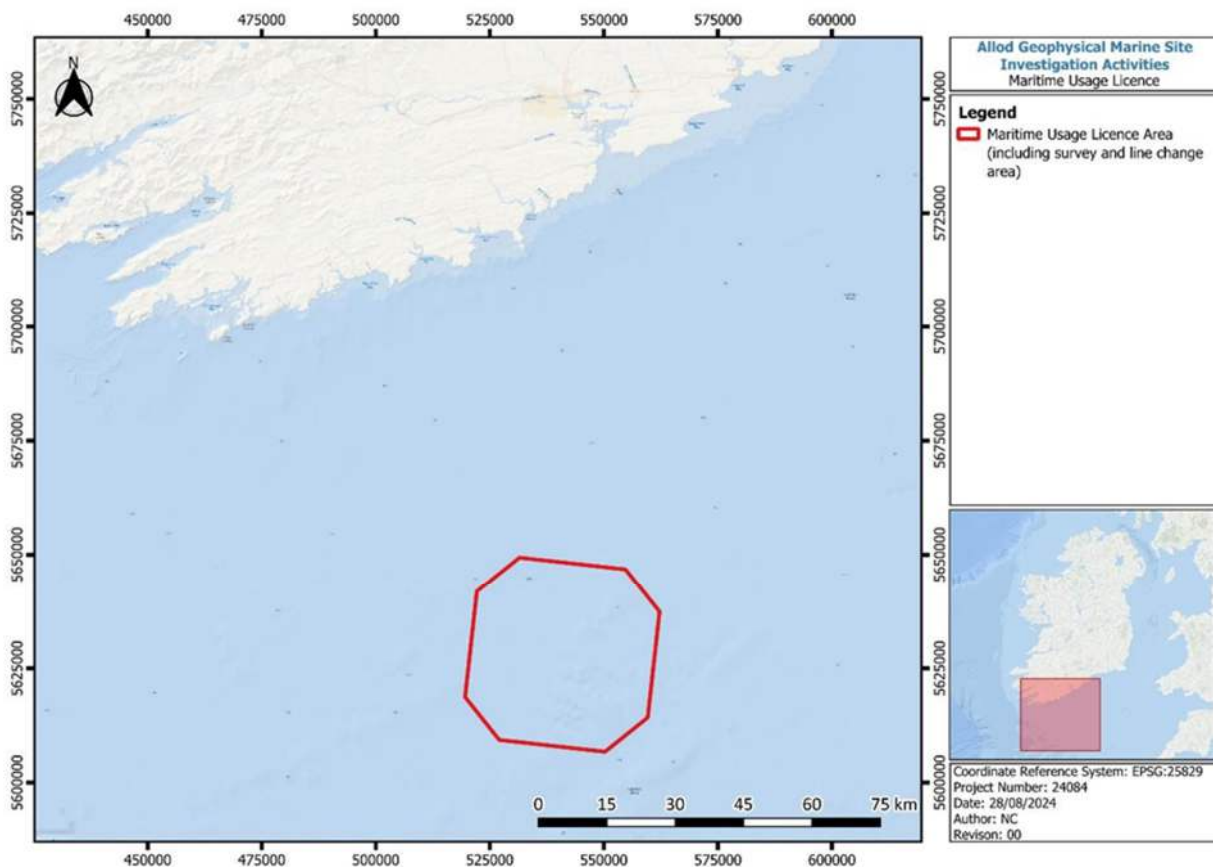


Figure 1 – Location of the proposed maritime usage area (applicant's map)

Table 1 – Summary of proposed maritime usage activities

Proposed maritime usage activities	Details
<p>Geophysical</p> <ul style="list-style-type: none"> <li>• Airgun Array</li> <li>• Magnetometer</li> <li>• Sub-bottom Profiling (SBP) - Boomer</li> <li>• Sub-bottom Profiling (SBP) - Parametric Pinger</li> <li>• Sub-bottom Profiling (SBP) - Sparker</li> <li>• Multibeam Echosounder (MBES)</li> <li>• Ocean Bottom Nodes (OBN)</li> </ul>	<p>15mx15m array of approx. 40no. small airguns (2000 psi, 4500 in<sup>3</sup> capacity)</p> <p>10 no. streamers (8km length), with hydrophones, 100m between each streamer. Total width 1km, 10000 no. hydrophones in total</p> <p>May be undertaken across the full extent of the proposed MUL Area</p> <p>May be undertaken across the full extent of the proposed MUL Area</p> <p>May be undertaken across the full extent of the proposed MUL Area</p> <p>May be undertaken across the full extent of the proposed MUL Area</p> <p>May be undertaken across the full extent of the proposed MUL Area</p> <p>May be undertaken across the full extent of the proposed MUL Area</p> <p>Each OBN has dimensions of 200x155x70mm and has a weight of 2.5kg in seawater</p> <p>May be deployed by ROV at up to 500 locations across the full extent of the proposed MUL Area</p>
<p>Remote Operated Vehicle (ROV)</p>	<p>May be used to deploy and recover the Ocean Bottom Nodes (OBNs) to and from the seabed</p>
<p>Ultra-short baseline (USBL)</p>	<p>May be used across the Maritime Usage Licence Area to track the position of subsea equipment</p>

## 2.2 Brief description of the site characteristics

The proposed maritime usage area is located in an area of the Celtic Sea with approximate water depths of between 91-108m. 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.

## 3. Identification of relevant European sites

The MUL application is subject to screening for appropriate assessment in accordance with Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, to determine if it alone, or in-combination with other plans or projects, is likely to have a significant effect on a European sites, in view of best scientific knowledge and the conservation objectives of the sites. The applicant submitted a Supporting Information for Screening of Appropriate Assessment (SISAA) report in support of the application which was referred to during this assessment

The proposed maritime usage is not directly connected with or necessary to the management of any European site(s). The European sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) listed on Table 2 have been considered for appropriate assessment, given the nature, scale and Zone of Influence of the maritime usage, the conservation objectives of the European sites and using the Source-Pathway-Receptor model.

**Table 2 - Identification of relevant European sites, their qualifying interests and site-specific conservation objectives.** Those Qualifying Interests marked in bold have been screened in for Stage 2 appropriate assessment.

European site & site code	Distance from proposed MUL area (km)	List of Qualifying Interests	Connections (Source-pathway-receptor)	European Site Screened in	Site-specific conservation objectives
Roaringwater Bay and Islands SAC [000101]	75-100	<b><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</b> <b><i>Halichoerus grypus</i> (Grey Seal) [1364]</b>	Yes – possible disturbance, displacement or harm (PTS <sup>1</sup> or auditory injury) from underwater noise	Yes	<a href="#">NPWS (2011)</a> Roaringwater Bay and Islands SAC [000101]. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Large shallow inlets and bays [1160] Reefs [1170] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030] Submerged or partially submerged sea caves [8330] <i>Lutra lutra</i> (Otter) [1355]	No		
Kenmare River SAC [002158]	>100km	<b>Harbour Porpoise (<i>Phocoena phocoena</i>) [1351]</b>	Yes – possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	Yes	<a href="#">NPWS (2026)</a> Kenmare River SAC [002158]. Version 2.0. National Parks and Wildlife

<sup>1</sup> Permanent Threshold Shift

		<p>Large shallow inlets and bays [1160]  Reefs [1170]  Perennial vegetation of stony banks [1220]  Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]  Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]  Grey Seal (<i>Halichoerus grypus</i>) [1364]  Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]  Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]  Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]  European dry heaths [4030]  <i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]  Calaminarian grasslands of <i>the Violetalia calaminariae</i> [6130]  Submerged or partially submerged sea caves [8330]  <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]  <i>Rhinolophus hipposideros</i> (Lesser Horseshoe Bat) [1303]  <i>Lutra lutra</i> (Otter) [1355]</p>	No		Service, Department of Arts, Heritage and the Gaeltacht.
Hook Head SAC [000764]	>100	<b><i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]</b>	Yes – possible disturbance,	Yes	<a href="#">NPWS (2025)</a>

		<b><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</b>	displacement or harm (PTS or auditory injury) from underwater noise		Hook Head SAC [000764]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Large shallow inlets and bays [1160] Reefs [1170] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	No		
Carnsore Point SAC [002269]	>100	<b><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</b>	Yes – possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	Yes	<a href="#">NPWS (2024)</a> Carnsore Point SAC [002269]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Mudflats and sandflats not covered by seawater at low tide [1140] Reefs [1170]	No		
Blasket Islands SAC [002172]	>100	<b><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</b>	Yes – possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	Yes	<a href="#">NPWS (2014)</a> Blasket Islands SAC [002172]. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Reefs [1170] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] <i>Halichoerus grypus</i> (Grey Seal) [1364] European dry heaths [4030] Submerged or partially submerged sea caves [8330]	No		
Blackwater Bank SAC [002953]	>200	<b><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</b>	Yes – possible disturbance,	Yes	<a href="#">NPWS (2024)</a>

			displacement or harm (PTS or auditory injury) from underwater noise		Blackwater Bank SAC [002953]. Version 3.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Sandbanks which are slightly covered by sea water all the time [1110]	No		
Belgica Mound Province SAC [002327]	>200	<b><i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]</b> <b><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</b>	Yes – possible disturbance, displacement or harm (PTS or auditory injury) from underwater noise	Yes	<a href="#">NPWS (2025)</a> Belgica Mound Province SAC [002327]. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Reefs [1170]	No		

#### 4. Assessment of likely significant effects

Table 3 identifies the potential direct and indirect impacts that may have an effect on the conservation objectives of European sites, taking into account the nature and scale of the proposed maritime usage.

Table 3 – Potential direct and indirect impacts of the proposed maritime usage on the conservation objectives of European sites

Potential Impacts	Possible significance of Potential impacts (duration, magnitude, etc.)
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.

#### 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-combination assessment has been undertaken using professional and scientific judgement and is assessed primarily in terms of potential spatial and temporal impacts.

The spatial scope of the in-combination assessment is a radius of 20km from the extent of the proposed maritime usage area and is based on the maximum distance of underwater noise generated by airgun array seismic survey equipment and the Effective Deterrence Range<sup>2</sup> 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 activities are proposed. The applicant has applied for a seven-year licence and thus the temporal scope is seven years.

A search of relevant databases was undertaken on the 28/04/2026. No projects were found to have the potential to act in combination with the proposed maritime usage.

The following plans, related to the development of the maritime environment were also considered:

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



Likely significant in-combination effects between this application, the plans considered and the plans listed above, on the conservation objectives of the European sites considered in this report can be excluded at this stage.

<sup>2</sup> Effective Deterrence Range – the radius of a circular area assumed to be disturbed

**Were mitigation measures considered during the screening process?**

No

**5. Screening Determination Statement**

<p>The assessment of significant effects:</p> <p>Having considered the legal framework applicable to appropriate assessment, the information on file, and having regard to:</p> <ul style="list-style-type: none"> <li>• The nature and scale of the proposed development</li> <li>• The distance to the nearest European sites</li> <li>• Possible disturbance from underwater noise,</li> </ul> <p>it was concluded that the proposed maritime usage by Allód Energy Ltd., to carry out Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000 in the Celtic Sea (approximately 65km south of the West Cork coast) (MUL240005) will require Stage 2 appropriate assessment. It cannot 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 a European site.</p>		
Signature and Date of Recommending Officer	 Ross Fitzgerald Marine Analyst	01/05/2026
Signature and Date of Decision Maker	 John Evans Director of Maritime Usage Licensing	05/05/2026