



October 31, 2025

licence@mara.gov.ie

RE: Request for Observations – MUL240010

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the application from Eirgrid for a Maritime Usage Licence for **site investigation works** to inform the engineering design and environmental assessments of a proposed electrical cable circuit crossing Dublin Bay from Blackrock Park to Shellybanks.

It is essential that the sea-fishing and aquaculture sectors are fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment as **the proposed site investigation works** are being evaluated.

Fishers and aquaculture site holders 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.

To inform the DAFM comments, the observations of the Marine Institute (MI) and Bord Iascaigh Mhara (BIM) on the application were requested.

Having reviewed all the MUL application documents, the MI agrees with section 8.3 of the AIMU report that: "Taking into consideration the limited nature, scale, size, and duration of the SI works, there will be a negligible impact on Fisheries and no impact on Aquaculture as a result of the SI works."

BIM also believe there would be a negligible impact on Fisheries from the proposed works.

Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. According to BIM's Business of Seafood 2024, €13 million worth of seafood was landed into Howth in 2024. The area of interest, set out in the licence application, is adjacent to an area where fishing for whelk takes place.

Exports of whelk from Ireland were valued at €16 million in 2024, making it the 12th most popular species exported from Ireland.

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

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Vessel Monitoring System (VMS) data regarding fishing in, and around, the area of interest 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 systems on board.

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.

It is acknowledged that a Fishery Liaison Officer (FLO) has been appointed and has been engaging with local communities, stakeholder and in particular the fisheries and seafood sector. DAFM would urge that early and ongoing consultation with the fishing industry continues to ensure minimum impacts on the seafood industry.

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

Yours sincerely,

Marine Divisions
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine