



December 23, 2025

licence@mara.gov.ie

RE: Maritime Usage Licence Application - Reference MUL240011

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application by Bremore Ireland Port Designated Activity Company (BIPDAC) for a Maritime Usage Licence to Marine environmental surveys for site investigations to inform the location and design of a proposed port infrastructure. The surveys will include marine geophysical, geotechnical, environmental, metocean and archaeological surveys, north of Balbriggan, spanning the border of County Meath and Dublin, Gormanston Bay Beach and Knocknagin Bay Beach.

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 survey work** is 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.

The MI noted no overlap between the licence area and licensed aquaculture sites and partial overlap with the Shellfish Waters Directive and Inshore Shellfish Production Areas. The application area does overlap with spawning and/or nursery grounds of several commercially important fish species.

The MI note in that the application that it is stated: *BIPDAC and an appointed FLO will work closely with fishers in the area to minimise disruption and potential impacts...*"

The MI note the proposed survey operations may impact fishing activities and the indicated area of operations is coincidental with commercial fishing activities, however the spatial extent is relatively small, and operation times limited. Independently, the proposed operations should not substantially interfere with fish stocks, fishing activities or aquaculture activities in the locality.

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It is assumed that the necessary notices to mariners / fishing vessels will be made regarding the operations and that geophysical surveys and sampling will operate under soft-start up procedures to protect marine fauna in the vicinity.

There is potential for cumulative impacts between these and other survey/dredging activities that may be active in the local vicinity and/or near timeframes.

BIM also state that no impact to aquaculture sites is envisaged and that the main concern from a fisheries context would be disturbance to fishing, and accidental entanglement with static fishing gear by the survey vessels, and/or by fishing vessels with the deployed survey equipment.

BIM also share the MI's recommendation that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising and every effort should be made to avoid miscommunication and the risk of not reaching all active fishermen in the areas regarding timelines and proposed activities.

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 survey work** 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 survey activity should incorporate the principle of maximising coexistence with established activities in marine areas.

Commercial sea-fishing is a long standing, pre-existing and traditional activity in the marine environment. A variety of fishing activities, including for razor clam, crab, lobster, whelk etc take place within, and adjacent to, the area of interest outlined in licence application MUL 240011 (Source: [Ireland's Marine Atlas](#)).

Vessel Monitoring System (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 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.

As set out in the Assessment of Impacts through the Maritime Usage Report, proposed site investigation activities will be temporary and have a short duration. The mitigation measures proposed in relation to commercial fisheries are welcomed. It is noted that the Fisheries Liaison Officer (FLO) will engage with fishers who operate within the applicable survey area, including those with static gear, such as crab, lobster, whelk pots etc and that the potential movement of this gear on a temporary basis will be discussed. The FLO should engage with the local fishing community before, during, and after the site investigation activities, keep them informed of the



schedule of works in relation to such activities, and regarding any follow-up plans which may affect fisheries as deemed relevant.

DAFM would urge that early and ongoing consultation with the fishing industry continues to ensure minimum impacts on the seafood industry.

Please also find attached documents from the MI and BIM which provide further comments for consideration.

Yours sincerely,

Marine Divisions

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