



**Iascach Intíre Éireann
Inland Fisheries Ireland**

MARINE LICENCE VETTING COMMITTEE:

MUL240011 – Bremore Port; Overview: Investigations into the feasibility of developing port infrastructure at Bremore, off the coast of County Dublin and County Meath.

Request for observations from Ms. Joanna Staunton (MARA) dated 02.12.2025

Overview:

A maritime usage licence is sought to undertake marine environmental, ecological surveys and technical site investigations in support of an application to inform the design of the Bremore Port and provide data to enable the development of an Environmental Impact Assessment to support the planned application. The proposed investigations comprise four major strands, namely hydrographical and geophysical surveys, geotechnical surveys, metocean monitoring (waves and sediment), ecological monitoring and archaeological monitoring, conducted over periods ranging from 24 days to 12 to 24 months. The area of the MUL is 159.48 km², the Proposed Development Area is 4.21 km² at Bremore Ireland Port off the coast of counties Dublin, Meath and Louth.

IFI Comment

Given the state of our diadromous fish species IFI believe that all activities should aim to reduce any impact on these species. River lamprey, sea lamprey, salmon and twaite shad are Habitat Directive Annex II species and are qualifying interest for a number of Natura 2000 sites along the East Coast. These species use the coastal waters, to migrate through and as a feeding area. The European Eel is critically endangered and is known to inhabit both freshwater, transitional and coastal waters.

For migratory fish species 35 kms is not an adequate distance for a zone of influence. Twaite shad from the Severn Estuary have been detected in the Munster Blackwater (Davies *et al.*, 2020) and while this evidence was highlighted in the SISAA it didn't change the zone of influence. Given how few shad have been tagged, the detection of 1 UK tagged fish in an Irish estuary indicates mixing of stocks within the Irish Sea. Shad have been reported within the Boyne Estuary despite no evidence of spawning this shows that shad are migrating up the coast of Ireland while feeding and therefore it cannot be excluded that there won't be a significant impact on this HD listed species.

Page 81 of the SISAA mention hosts for twaite shad, this is an error and potentially refers to sea lamprey.



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Page 98 screens out annex II species but there is no justification in the text for river lamprey.

The SISAA report on page 43 states that **likely effects of underwater noise on Annex II fish species from these activities cannot be excluded**. IFI believe the twaite shad should be screened in and following the mitigation measures that are being implemented as outlined in the NIS they can be screened out in that process. There is a lack of data around the use of coastal waters by our diadromous fish species and the routes they take in the Irish Sea.

To reduce impact on fish species the use of soft-start and ramp-up procedures for any sound-generating works undertaken – both on a day-to-day basis and on re-start after any stoppages within any day should be undertaken. This measure should be a condition of the foreshore licence. The comments of IFI in this regard relate to fish species of conservation significance and of leisure angling significance all of which constitute part of IFI's brief.

Ciara O'Leary and Nicola O'Gorman (IFI R&D)
19.12.2025

References

Davies, P., Britton, R. J., Nunn, A. D., Dodd, J. R., Crundwell, C., Velterop, R., ... & Bolland, J. D. (2020). Novel insights into the marine phase and river fidelity of anadromous twaite shad *Alosa fallax* in the UK and Ireland. *Aquatic Conservation: Marine and Freshwater Ecosystems*, 30(7), 1291-1298.