



12th November 2025

licence@mara.gov.ie

RE: Request for observations – MUL Reference: MUL240012

A Chara,

The Marine Divisions of the Department of Agriculture, Food, and the Marine welcome the opportunity to provide comments on the application from Uisce Éireann for a Maritime Usage Licence to conduct a strategic modelling study of water currents within Donegal Bay and Sligo Bay.

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 development of **the modelling study** 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.

The Minister's responsibility for the foreshore in the Department of Agriculture, Food and the Marine includes activities in the six designated Fishery Harbour Centres, and all Aquaculture and Fisheries related activities. If an application does not relate to Aquaculture or Fisheries, then responsibility will rest with MARA, the Maritime Regulator.

Therefore, the application by Uisce Éireann, as it pertains to Killybegs Fishery Harbour Centre, requires the issuing of a Foreshore Licence by this Department, and the removal of the area from the licence map overlapping the Fishery Harbour Centre on the final decision if granting the MUL.

Please see the link below to the application form and accompanying documentation.

<https://www.gov.ie/en/publication/fcd20-aquaculture-foreshore-management/#forms-and-downloads>

For further information on the six state-owned Fishery Harbour Centres, and their boundaries, please see the following secondary legislation:

Fishery Harbour Centre (Ros and Mhíl) Order 1981

[S.I. No. 208 of 1981](#)

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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Fishery Harbour Centre (Killybegs) (Amendment) Order 1987	S.I. No. 235 of 1987
Fishery Harbour Centre (Howth) Order 1989:	S.I. No. 336 of 1989
Fishery Harbour Centre (Dunmore East) Order 1989	S.I. No. 337 of 1989
Fishery Harbour Centre (Castletownbere) (Amendment) Order 1992 (1970 and 1992)	S.I. No. 243 of 1992 (Amended S.I. No. 57 of 1970)
Fishery Harbour Centre (An Daingean) Order 2007	S.I. No. 233 of 2007

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

The MI stated that commercial fishing activities take place in the proposed licence areas as outlined in the application, which also coincide with designated shellfish waters and aquaculture licenced areas.

The MI observes that the proposed survey operations should not substantially interfere with fish stocks, fishing activities or aquaculture activities in the area. The MI assumes that the necessary notices to mariners and fishing vessels will be made regarding the deployment of monitoring devices and bathymetric survey activities.

Furthermore, the indicated areas overlap with spawning and nursery grounds for a range of commercial fish species, and there is potential for cumulative impacts between these and other survey activities that may be active in the local vicinity. This must be taken into account in the granting of any licence to survey the area.

BIM acknowledge the reference to commercial fisheries activities in the licence documentation and note that there is no significant effect on shellfish and aquaculture as a result of the proposed activities.

BIM note the Assessment of Impact on the Maritime Usage (AIMU) report is aware of the aquaculture sites in the proposed licence areas and possible avoidance and mitigation measures are mentioned.

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, therefore it is vital that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising from such incidents as stated above.

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 modelling study** 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.

DAFM notes, as per the AIMU Report, that the waters within Donegal Bay, Sligo Bay, Killala Bay, and their environs are used by Ireland's inshore fishing fleet for a variety of distinct types of fishing, with pot fishing conducted over the vast majority of the area.

However, it should be noted that Vessel Monitoring System (VMS) data regarding fishing activity in the 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 unduly impact 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.

DAFM would seek confirmation that where any indirect impacts on traditional fishing grounds are identified, consultation with local stakeholders will be undertaken prior to and throughout the works and a Fisheries Liaison Officer (FLO) will be appointed to liaise with all the relevant sea going and foreshore users in advance of any marine survey operations.

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