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Natura Impact Statement

Uisce Éireann Sligo and Donegal Strategic Model

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1. Introduction

Uisce Éireann wish to conduct a strategic modelling study of water currents within Donegal Bay, Sligo Bay, Killala Bay and their adjoining waters (Figure 1). A foreshore license application for this modelling was submitted in 2022 (Foreshore reference number: FS007553). The original licence application was for the deployment of static Acoustic Doppler Current Profilers (ADCPs) and associated ancillary instrumentation. Uisce Éireann now wish to expand the survey to include the gathering of bathymetric and tidal data.

The proposed programme of surveys includes vessel-based assessment of bathymetry using a combination of single-beam, multibeam and LiDAR surveys, use of aerial drones, surface water sampling and the deployment of tidal gauges.

Supporting Information for Screening for Appropriate Assessment (SISAA) of the proposed project was prepared (MERC, 2024). The SISAA has concluded that, in the absence of mitigation, it could not be excluded on the basis of objective scientific information, that the proposed project might have a significant effect on a European Site. Accordingly, it was considered that Appropriate Assessment (AA) of the proposed project is required.

Based on this conclusion, this report represents a Natura Impact Statement (NIS) for the proposed project.

This revised Natura Impact Statement (NIS) has been prepared to address the requirements of the Maritime Area Regulatory Authority (MARA) as set out in its notice of 23 October 2025 under Section 117(6)(a) of the Maritime Area Planning Act 2021. MARA determined that an Appropriate Assessment (AA) is required for the proposed maritime usage. This revision therefore provides the information necessary for MARA, as the competent authority under Section 117 of the Maritime Area Planning Act 2021, to carry out an Appropriate Assessment in accordance with Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011.

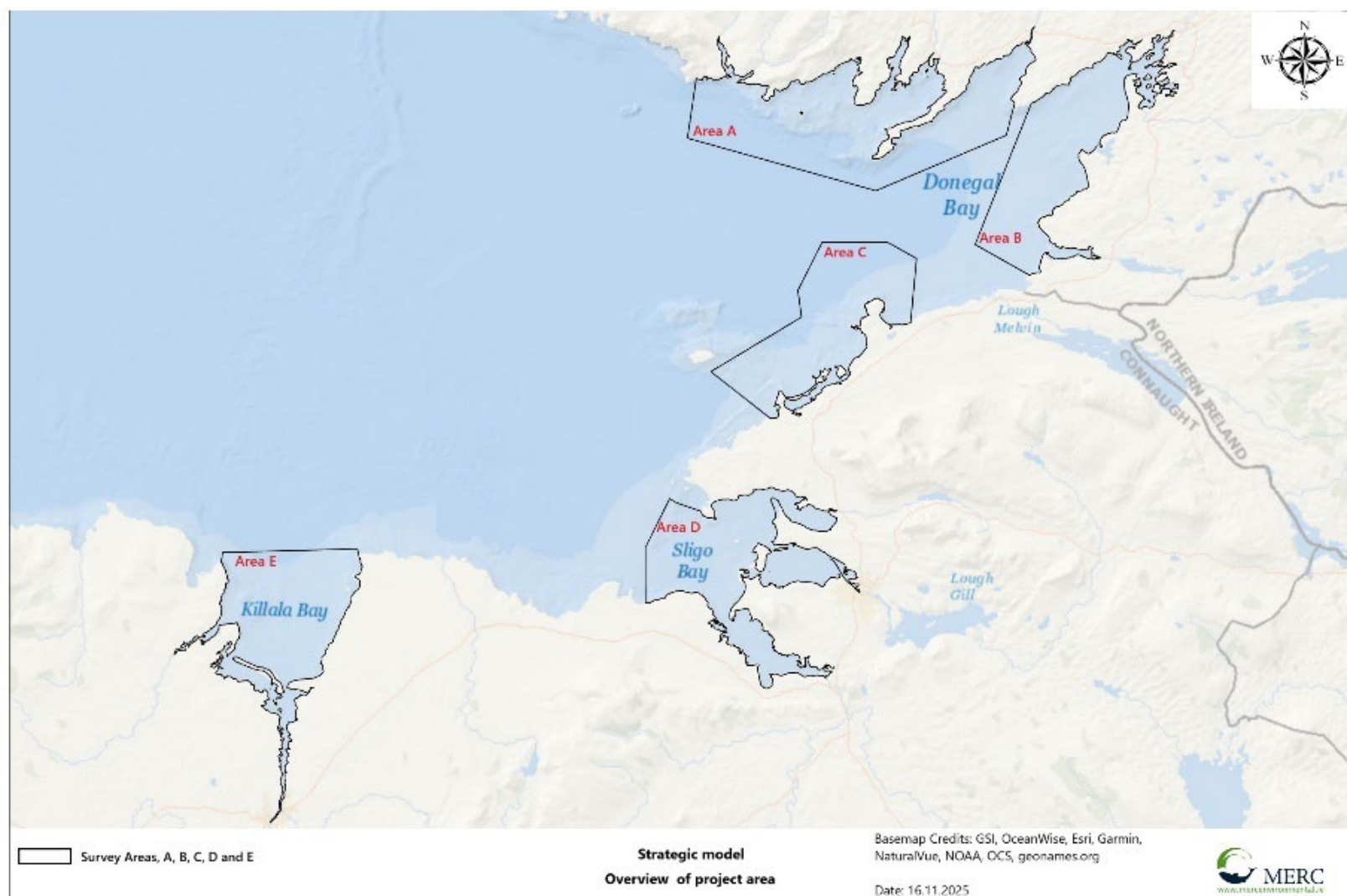


Figure 1. Overview of proposed project site.

2. Statement of authority

This report was prepared by MERC Consultants. MERC are a specialist marine ecological survey and consultancy firm. Core staff have more than 60 years of combined experience and specialist knowledge in relation to Irish aquatic habitats and species in addition to the assessment and management of conservation interests. MERC were responsible for preparing the [NPWS national monitoring of marine Annex I habitats](#) for compliance under Article 17 of the EU Habitats Directive in the period 2015-2019. In this context MERC were responsible for the assessment and reporting of marine Annex I habitats in Ireland and were the authors of all Article 17 reports and overarching site monitoring reports. MERC are currently engaged in conducting surveys and preparing the relevant reports for the current (2022-2025) monitoring cycle.

In addition to their scientific expertise, MERC has an in-depth knowledge of Irish and European Environmental legislation and policy. In 2011, MERC prepared the text describing Activities Requiring Consent (ARCs) for inclusion in a handbook detailing the regulatory framework for all developments within designated sites in Ireland on behalf of the National Parks and Wildlife Service. They have also produced numerous Conservation Management Plans for the same department. To date, MERC has conducted in excess of 200 ecological reports in support of Appropriate Assessment under Article 6(3) of the EU Habitats Directive.

3. Methods

This document updates the 17/5/2024 NIS to reflect MARA's Screening and Determination Report (dated 23 October 2025). It addresses all issues listed in Tables 1–3 of that report — including site coverage, impact pathways, and in-combination assessment. It also sets out mitigation measures and revised conclusions to demonstrate that the proposed project will not lead to adverse effects on the integrity of any European site.

Guidelines and legislation

This report has been prepared, *inter alia*, with reference to the following European Directives, national legislation and guidance relevant to the appropriate assessment of projects and plans with regard to the implementation of the provisions of Article 6(3) and (4) of the EU Habitats Directive 92/43/EEC.

- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna. Official Journal of the European Communities.
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version).
- European Communities (Birds and Natural Habitats) Regulations 2011. SI No. 477 of 2011.
- Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Commission 2018. 7621 final. Office for Official Publications of the European Communities, Luxembourg.
- Assessment of plans and projects significantly affecting Natura 2000 sites; Methodological Guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission, 2002.
- Appropriate Assessment Screening for Development Management. OPR Practice Note PN01. Office of the Planning Regulator. March 2021.

- Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters. Department of Arts, Heritage and the Gaeltacht, 2014.
- JNCC. 2023. JNCC guidance for the use of Passive Acoustic Monitoring in UK waters for minimising the risk of injury to marine mammals from offshore activities. JNCC, Peterborough.

4. Screening assessment

Uisce Éireann proposes to undertake vessel-based Acoustic Doppler Current Profiler (ADCP) monitoring, bathymetric surveys of intertidal areas, drone surveys and the deployment of tidal gauges at five locations along the Donegal and Sligo coasts (see Table 1). The proposed licence duration is three years.

Table 1. Description of activities, methods and expected duration of proposed maritime usage.

Activity	Description / Method	Expected Duration / Frequency
Deployment of vessel-mounted ADCPs	Up to 13 no. ADCPs to be deployed from the vessel for current profiling at set locations	30 mins – 1 hour per location and/or 13-hour continuous deployment
Deployment of tidal gauges	Installation of tidal gauges at selected sites to record water level variances	Minimum of 3 months (coinciding with other sampling)
Bathymetric surveys of intertidal areas	Conducted using single beam or multibeam echosounders, LiDAR, or a combination of both	One occasion, to cover all intertidal areas applied for
Collection of conductivity, temperature and depth (CTD) data	Measurements to be taken periodically alongside ADCP profiling	Periodically, over 13-hour deployment periods
Use of aerial drones	Done surveys will be undertaken using a DJI M350 Drone.	Surveys will be carried out in daylight hours at low tide only, typically flying for 4 hours per day. Transects of 500m length will be carried out each day, resulting in 40 Ha of foreshore being surveyed each day. The total number of flights to cover areas scoped for drone surveys is estimated to be 30 days.

A list of European sites and the relevant Qualifying Interests (QIs) screened in is given in Table 2.

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.

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
Slieve League SAC - 000189	MUL area overlapping Slieve League SAC	Reefs [1170] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220]	No	No	NPWS (2015) Conservation Objectives: Slieve League SAC - 000189. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

St. John's Point SAC - 000191	MUL area overlapping St. John's Point SAC	<p>Large shallow inlets and bays [1160]</p> <p>Reefs [1170]</p> <p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]</p> <p>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]</p> <p>Alkaline fens [7230]</p> <p>Limestone pavements [8240]</p> <p>Submerged or partially submerged sea caves [8330]</p> <p><i>Euphydryas aurinia</i> (Marsh Fritillary) [1065]</p> <p><i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]</p>	No	No	NPWS (2015) Conservation Objectives: St. John's Point SAC - 000191. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Donegal Bay (Murvagh) SAC - 000133	MUL area overlapping Donegal Bay (Murvagh) SAC	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]</p> <p>Humid dune slacks [2190]</p>	No	No	NPWS (2012) Conservation Objectives: Donegal Bay (Murvagh) SAC - 000133. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		<i>Phoca vitulina</i> (Harbour Seal) [1365]	Yes – surveys within Harbour Seal foraging range (33.65km, Sharples et al. (2012))	Yes – possible visual and above water noise disturbance	

Lough Eske and Ardnamona Wood SAC - 000163	MUL area is adjacent to Lough Eske and Ardnamona Wood SAC	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] Petrifying springs with tufa formation (Cratoneurion) [7220] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] <i>Vandenboschia speciosa</i> (Killarney Fern) [6985] <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029] <i>Salmo salar</i> (Salmon) [1106]	No	No	NPWS (2019) Conservation Objectives: Lough Eske and Ardnamona Wood SAC - 000163. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Lough Melvin SAC - 000428	~3km	Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410] <i>Lutra lutra</i> (Otter) [1355] <i>Salmo salar</i> (Salmon) [1106]	No	No	NPWS (2021) Conservation Objectives: Lough Melvin SAC - 000428. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht

Bunduff Lough and Machair/Trawalua/Mullaghmore SAC - 000625	MUL area overlapping Bunduff and Lough Machair/Trawalua/Mullaghmore SAC	Mudflats and sandflats not covered by seawater at low tide [1140] Large shallow inlets and bays [1160] Reefs [1170] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] Machairs (* in Ireland) [21A0] <i>Petalophyllum ralfsii</i> (Petalwort) [1395] <i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130] Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210] Alkaline fens [7230] <i>Euphydryas aurinia</i> (Marsh Fritillary) [1065] <i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	No	No	NPWS (2015) Conservation Objectives: Bunduff Lough and Machair/Trawalua/Mullaghmore SAC - 000625. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Ballysadare Bay SAC - 000622	MUL area overlapping Ballysadare Bay SAC	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]	No	No	NPWS (2013) Conservation Objectives: Ballysadare Bay SAC - 000622. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

		<i>Phoca vitulina</i> (Harbour Seal) [1365]	Yes – surveys within Harbour Seal foraging range (33.65km, Sharples et al. (2012))	Yes – possible visual and above water noise disturbance	
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC - 000627	MUL area overlapping Cummeen Strand/Drumcliff Bay (Sligo Bay)	<p>Estuaries [1130]</p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p><i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]</p> <p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p><i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]</p> <p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p> <p><i>Lampetra fluviatilis</i> (River Lamprey) [1099]</p>	No	No	NPWS (2024) Conservation Objectives: Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC - 000627. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

		<i>Phoca vitulina</i> (Harbour Seal) [1365]	Yes – surveys within Harbour Seal foraging range (33.65km, Sharples et al. (2012))	Yes – possible visual and above water noise disturbance	
Killala Bay/Moy Estuary SAC - 000458	MUL area overlapping Killala Bay/Moy Estuary SAC	<p>Estuaries [1130]</p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</p> <p><i>Salicornia</i> and other annuals colonising mud and sand [1310]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Humid dune slacks [2190]</p> <p><i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]</p> <p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p>	No	No	NPWS (2012) Conservation Objectives: Killala Bay/Moy Estuary SAC - 000458. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

		<i>Phoca vitulina</i> (Harbour Seal) [1365]	Yes – surveys within Harbour Seal foraging range (33.65km, Sharples et al. (2012))	Yes – possible visual and above water noise disturbance	
West of Ardara/Maas Road SAC - 000197	~45km	<p>Estuaries [1130]</p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Large shallow inlets and bays [1160]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Decalcified fixed dunes with <i>Empetrum nigrum</i> [2140]</p> <p>Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) [2150]</p> <p>Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]</p> <p>Humid dune slacks [2190]</p> <p>Machairs (* in Ireland) [21A0]</p>	No	No	<p>NPWS (2015)</p> <p>Conservation Objectives: West of Ardara/Maas Road SAC - 000197. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.</p>

		Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]			
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		<p>Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130]</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p><i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]</p> <p>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]</p> <p>Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>) [6510]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Depressions on peat substrates of the Rhynchosporion [7150]</p> <p>Alkaline fens [7230]</p> <p><i>Vertigo geyeri</i> (Geyer's Whorl Snail) [1013]</p> <p><i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]</p> <p><i>Euphydrias aurinia</i> (Marsh Fritillary) [1065]</p> <p><i>Salmo salar</i> (Salmon) [1106]</p> <p><i>Petalophyllum ralfsii</i> (Petalwort) [1395]</p> <p><i>Najas flexilis</i> (Slender Naiad) [1833]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p> <p><i>Phoca vitulina</i> (Harbour Seal) [1365]</p>			
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Slieve Tooley/Tormore Island/Loughros Beg Bay SAC - 000190	~25km	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Decalcified fixed dunes with <i>Empetrum nigrum</i> [2140] Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) [2150] Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170] Humid dune slacks [2190] Alpine and Boreal heaths [4060] Blanket bogs (* if active bog) [7130] <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014] <i>Lutra lutra</i> (Otter) [1355]	No	No	NPWS (2015) Conservation Objectives: Slieve Tooley/Tormore Island/Loughros Beg Bay SAC - 000190. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		<i>Halichoerus grypus</i> (Grey Seal) [1364]	Yes – surveys within Grey Seal foraging range (51.29km, Cronin et al. 2011))	Yes – possible visual and above water noise disturbance.	

Ben Bulbin, Gleniff and Glenade Complex SAC - 000623	~4km	<p>Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260]</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p><i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]</p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]</p> <p>Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Transition mires and quaking bogs [7140]</p> <p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p>Alkaline fens [7230]</p> <p>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]</p> <p>Calcareous and calcshist screes of the montane to alpine levels (<i>Thlaspietalia rotundifolii</i>) [8120]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p><i>Vertigo geyeri</i> (Geyer's Whorl Snail) [1013]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>	No	No	<p>NPWS (2021)</p> <p>Conservation Objectives: Ben Bulbin, Gleniff and Glenade Complex SAC - 000623. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.</p>
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		<i>Najas flexilis</i> (Slender Naiad) [1833] <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]			
Slyne Head Islands SAC - 000328	158km	Reefs [1170] <i>Halichoerus grypus</i> (Grey Seal) [1364] <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]	No	No	NPWS (2024) Conservation Objectives: Slyne Head Islands SAC - 000328. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht
Duvillaun Islands SAC - 000495	85km	<i>Halichoerus grypus</i> (Grey Seal) [1364] <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]	No	No	NPWS (2024) Conservation Objectives: Duvillaun Islands SAC - 000495. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht
River Finn SAC - 002301	~10km	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] Blanket bogs (* if active bog) [7130] Transition mires and quaking bogs [7140] <i>Salmo salar</i> (Salmon) [1106] <i>Lutra lutra</i> (Otter) [1355]	No	No	NPWS (2017) Conservation Objectives: River Finn SAC - 002301. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Inishmore Island SAC - 000213	210km	Coastal lagoons [1150] Reefs [1170] Perennial vegetation of stony banks [1220] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170] Humid dune slacks [2190] Machairs (* in Ireland) [21A0] European dry heaths [4030] Alpine and Boreal heaths [4060] Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210] Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510] Limestone pavements [8240] Submerged or partially submerged sea caves [8330] <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014] <i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	No	No	NPWS (2024) Conservation Objectives: Inishmore Island SAC - 000213. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
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Lough Gill SAC - 001976	~1km	<p>Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]</p> <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</p> <p><i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092]</p> <p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p> <p><i>Lampetra planeri</i> (Brook Lamprey) [1096]</p> <p><i>Lampetra fluviatilis</i> (River Lamprey) [1099]</p> <p><i>Salmo salar</i> (Salmon) [1106]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>	No	No	<p>NPWS (2021)</p> <p>Conservation Objectives: Lough Gill SAC - 001976. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.</p>
Unshin River SAC - 001898	<1km	<p>Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion vegetation</i> [3260]</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]</p> <p>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]</p> <p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</p> <p><i>Salmo salar</i> (Salmon) [1106]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>	No	No	<p>NPWS (2021)</p> <p>Conservation Objectives: Unshin River SAC - 001898. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.</p>

River Moy SAC - 002298	<1km	Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510] Active raised bogs [7110] Degraded raised bogs still capable of natural regeneration [7120] Depressions on peat substrates of the Rhynchosporion [7150] Alkaline fens [7230] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0] <i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092] <i>Petromyzon marinus</i> (Sea Lamprey) [1095] <i>Lampetra planeri</i> (Brook Lamprey) [1096] <i>Salmo salar</i> (Salmon) [1106] <i>Lutra lutra</i> (Otter) [1355]	No	No	NPWS (2016) Conservation Objectives: River Moy SAC - 002298. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
West Connacht Coast SAC - 002998	~55km	<i>Phocoena phocoena</i> (Harbour porpoise) [1351] <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]	No	No	NPWS (2025) Conservation Objectives: West Connacht Coast SAC - 002998. Version 2.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
West Donegal Coast SPA - 004150	MUL area overlapping West Donegal Coast SPA	Peregrine (<i>Falco peregrinus</i>) [A103] Chough (<i>Pyrrhocorax pyrrhocorax</i>) [A346] Fulmar (<i>Fulmarus glacialis</i>) [A009] Kittiwake (<i>Rissa tridactyla</i>) [A188]	No	No	NPWS (2025) Conservation Objectives: West Donegal Coast SPA – 004150 Version 1.0 National Parks and

		Razorbill (<i>Alca torda</i>) [A200]			Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Herring Gull (<i>Larus argentatus</i>) [A184]	Yes – nesting areas potentially disturbed	Yes – possible disturbance from above water noise	
Inishduff SPA - 004115	MUL area overlapping Inishduff SPA	Light-bellied Brent Goose (<i>Brenta bernicla hrota</i>) [A046] Sanderling (<i>Calidris alba</i>) [A144]	No	No	NPWS (2025) Conservation Objectives: Inishduff SPA - 004115 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Shag (<i>Phalacrocorax aristotelis</i>) [A018]	Yes – nesting areas potentially disturbed	Yes – possible disturbance from above water noise	
Donegal Bay SPA - 004151	MUL area overlapping Donegal Bay SPA	Great Northern Diver (<i>Gavia immer</i>) [A003] Common Scoter (<i>Melanitta nigra</i>) [A065] Wetland and Waterbirds [A999]	No	No	NPWS (2012) Conservation Objectives: Donegal Bay SPA – 004151 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Drumcliff Bay SPA - 004013	MUL area overlapping Drumcliff Bay SPA	Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Sanderling (<i>Calidris alba</i>) [A144] Wetland and Waterbirds [A999]	No	No	NPWS (2013) Conservation Objectives: Drumcliff Bay SPA - 004013 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Cummeen Strand SPA - 004035	MUL area overlapping Cummeen Strand SPA	Light-bellied Brent Goose (<i>Brenta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]	No	No	NPWS (2013) Conservation Objectives: Cummeen Strand SPA - 004035 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Ballysadare Bay SPA - 004129	MUL area overlapping Ballysadare Bay SPA	Light-bellied Brent Goose (<i>Brenta bernicla hrota</i>) [A046] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]	No	No	NPWS (2013) Conservation Objectives: Ballysadare Bay SPA - 004129 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Killala Bay/Moy Estuary SPA - 004036	MUL area overlapping Killala Bay/Moy Estuary SPA	Golden Plover (<i>Pluvialis apricaria</i>) [A140] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Wetland and Waterbirds [A999]	No	No	NPWS (2013) Conservation Objectives: Killala Bay/Moy Estuary SPA - 004036 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Ardboline Island and Horse Island SPA - 004135	0.65km	Barnacle Goose (<i>Branta leucopsis</i>) [A045]	No	No	NPWS (2025) Conservation Objectives: Ardboline Island and Horse Island SPA - 004135 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Cormorant (<i>Phalacrocorax carbo</i>) [A017]	Yes - nesting areas potentially disturbed	Yes - possible disturbance from above water noise	
Inishmurray SPA - 004068	0.77km	Barnacle Goose (<i>Branta leucopsis</i>) [A045]	No	No	NPWS (2025) Conservation Objectives: Inishmurray SPA - 004068 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
		Shag (<i>Phalacrocorax aristotelis</i>) [A018] Herring Gull (<i>Larus argentatus</i>) [A184] Arctic Tern (<i>Sterna paradisaea</i>) [A194]	Yes - nesting areas potentially disturbed	Yes - possible disturbance from above water noise	

Ballintemple and Ballygilgan SPA - 004234	MUL area adjoins Ballintemple and Ballygilgan SPA	Barnacle Goose (<i>Branta leucopsis</i>) [A045]	No	No	NPWS (2024) Conservation Objectives: Ballintemple and Ballygilgan SPA - 004234 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Aughris Head SPA - 004133	~5km	Kittiwake (<i>Rissa tridactyla</i>) [A188]	No	No	NPWS (2025) Conservation Objectives: Aughris Head SPA - 004133 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Horn Head to Fanad Head SPA - 004194	~71km	Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Barnacle Goose (<i>Branta leucopsis</i>) [A045] Peregrine (<i>Falco peregrinus</i>) [A103] Kittiwake (<i>Rissa tridactyla</i>) [A188] Guillemot (<i>Uria aalge</i>) [A199]	No	No	NPWS (2025) Conservation Objectives: Horn Head to Fanad Head SPA - 004194 Version 1.0 National Parks and Wildlife Service,
		Razorbill (<i>Alca torda</i>) [A200] Chough (<i>Pyrrhocorax pyrrhocorax</i>) [A346] Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395] Fulmar (<i>Fulmarus glacialis</i>) [A009]			Department of Arts, Heritage and the Gaeltacht.

Tory Island SPA - 004073	~70km	Corncrake (<i>Crex crex</i>) [A122] Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204] Fulmar (<i>Fulmarus glacialis</i>) [A009]	No	No	NPWS (2025) Conservation Objectives: Tory Island SPA - 004073 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Lough Derg (Donegal) SPA - 004057	~13km	Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] Herring Gull (<i>Larus argentatus</i>) [A184]	No	No	NPWS (2025) Conservation Objectives: Lough Derg (Donegal) SPA - 004057 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
Lough Conn and Lough Cullin SPA - 004228	~9km	Tufted Duck (<i>Aythya fuligula</i>) [A061] Common Scoter (<i>Melanitta nigra</i>) [A065] Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395] Wetland and Waterbirds [A999] Common Gull (<i>Larus canus</i>) [A182]	No	No	NPWS (2025) Conservation Objectives: Lough Conn and Lough Cullin SPA – 004228 Version 1.0 National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Following MARA's SAA Determination, additional consideration has been given to the potential for disturbance to bird species listed as SCIs for the following SPAs: West Donegal Coast SPA [004150], Inishduff SPA [004115], Ardboline Island and Horse Island SPA [004135], and Inishmurray SPA [004068].

5. Impact assessment

The screening determination identified the following pathways as having the potential for likely significant effects.

Potential short-term behavioural responses in grey seals and harbour seals arising from vessel activity, aerial drone operations and above-water noise. The key concern relates to temporary disturbance during periods of resting, moulting and pupping. Potential disturbance may occur where vessels operate in proximity to recorded haul-out for Harbour Seal (*Phoca vitulina*) and Grey Seal (*Halichoerus grypus*), potentially resulting in temporary displacement or altered behaviour. These sensitivities are recognised in the NIS and addressed through the mitigation set out in Section 6.

European Sites screened in for disturbance to seals (SACs):

- *Harbour Seal*: Donegal Bay (Murvagh) SAC; Ballysadare Bay SAC; Cummeen Strand/Drumcliff Bay SAC; Killala Bay/Moy Estuary SAC.
- *Grey Seal*: Slieve Tooley / Tormore Island / Loughros Beg Bay SAC.

Potential disturbance to SPA birds from drone surveys may cause short-term flushing or displacement of nesting and roosting species within adjoining SPAs screened in: West Donegal Coast SPA, Inishduff SPA, Ardboline & Horse Island SPA, and Inishmurray SPA. Any disturbance is expected to be brief and reversible due to the limited footprint and short duration of aerial activity.

European Sites screened in for disturbance to SPA bird species:

- *Cormorant* (*Phalacrocorax carbo*) – Ardboline & Horse Island SPA; West Donegal Coast SPA.
- *Shag* (*Phalacrocorax aristotelis*) – Inishduff SPA; Inishmurray SPA; West Donegal Coast SPA.
- *Herring Gull* (*Larus argentatus*) – Inishmurray SPA; West Donegal Coast SPA.

These SPAs contain nesting cliffs and coastal roosts that could be temporarily disturbed by above-water noise or drone operations.

Potential underwater noise effects – There is potential for temporary behavioural responses in Bottlenose Dolphin (*Tursiops truncatus*) and Harbour Porpoise (*Phocoena phocoena*) if present during survey works. However, the frequencies used by MBES/SSB systems (300–500 kHz) are above the hearing range of both species (JNCC, 2020; Southall et al., 2021; MARA, 2025). Therefore, no likely significant effects on Bottlenose Dolphin or Harbour Porpoise are considered possible

The site-specific Qualifying Interests (QIs) for the SACs screened in, as given in Table 2, are further discussed below and recommended mitigation measures are proposed.

5.1 Harbour Seal and Grey Seal

Harbour seal is a QI for Donegal Bay (Murvagh) SAC, Killala Bay/Moy Estuary SAC, Ballysadare Bay SAC and Cummeen strand/Drumcliff Bay (Sligo Bay) SAC.

Disturbance from vessel working in close proximity to haul out sites of Harbour seal, resulting in disturbance to this species at their recorded haul out sites could impact the Harbour seal population within the site during pupping, moulting and resting. Harbour seals are present within the aforementioned sites, throughout their life cycle. There is a potential for disturbance to the Harbour

seal QI for these sites should the vessel be operating within close proximity (<100m) of the haul out sites for these species.

Halichoerus grypus (Grey Seal) is a QI for Slieve Tooney / Tormore Island / Loughros Beg Bay SAC. There is a potential for disturbance to the Grey seal QI for this site should the vessel be operating within close proximity (<100m) of haul out sites for this species.

Therefore, to ensure the proposed surveys do not give rise to significant effects on any European Site designated for Harbour seal or Grey seal, the mitigation set out in Section 6 is recommended.

5.2 SPA Birds (Visual and Above-Water Disturbance)

Cormorant – Ardboline & Horse Island SPA; West Donegal Coast SPA – potential nesting disturbance and above-water noise.

Shag – Inishduff SPA; Inishmurray SPA –potential nesting disturbance and localised noise effects.

Herring Gull – Inishmurray SPA – potential noise-related disturbance during nesting.

Arctic Tern – Inishmurray SPA –potential temporary disturbance risk during the breeding period.

Razorbill – West Donegal Coast SPA – potential disturbance during breeding season.

Disturbance may arise from vessel presence, human activity, and drone operations.

These effects are expected to be temporary, reversible, and spatially limited due to the short duration of the survey programme.

The MUL240012 Screening and Appropriate Assessment Determination (MARA, 2025) identified potential short-term behavioural disturbance to Special Conservation Interest (SCI) bird species associated with the use of aerial drones during survey operations. The SPAs within or adjacent to the survey areas include West Donegal Coast SPA [004150], Inishduff SPA [004115], Ardboline Island and Horse Island SPA [004135], and Inishmurray SPA [004068].

Disturbance may arise from increased human activity, vessel presence, or drone flights at low altitude over nesting or roosting areas. Such disturbance could result in temporary flushing, displacement, or reduced nest attendance. However, any effects will be short-term, localised, and fully reversible, given the limited survey duration and the absence of habitat alteration.

5.3 Potential for in-combination effects

A total of 18 projects and 3 plans were identified within the ZOI of the proposed project and screened for in-combination effects. Of these, two projects were identified as having the potential to contribute to the in-combination effects as given in Table 3. Both of these projects have the potential to contribute to underwater noise in the receiving environment, with the potential to act in combination with noise and disturbance resulting from the proposed project.

Mitigation to address the potential for in-combination impacts is proposed in section 6.

Table 3. In-combination effects: Potential projects and plans.

Application licence no.	Applicant	Description/scope	Location	Potential for impact
MAC20240002	Donegal County Council	Installation of seasonal pontoon	Donegal Bay	Minor local vessel disturbance
MAC20230031	Bunbeg Harbour	Seasonal pontoon installation	Gweedore Bay	Negligible
MAC20230008	OPW	Flood-relief works (drainage, embankments)	Ballyshannon	Possible overlapping timing
FS007189	Aniar Offshore Array Ltd	Offshore wind-farm site investigations	Sligo / Donegal coasts	Acoustic survey noise
FS007553	Uisce Eireann	Strategic modelling study of water currents within Donegal Bay, Sligo Bay and their adjoining water	Donegal Bay, Sligo Bay and adjoining water	N/A
FS005725	Donegal County Council	Maintenance dredging	Killybegs	Temporary vessel presence
FS005954	Killybegs Harbour	Quay-wall upgrade	Killybegs	Temporary vessel presence

* FS007553 has been superseded by the present MUL application

Each of these activities outlined is short-term and spatially discrete relative to the proposed project. The implementation of the mitigation measures outlined in Sections 6.1 and 6.4—including MMO oversight, ramp-up procedures, 500 m exclusion zones, and drone altitude limits—will avoid cumulative disturbance.

Therefore, no cumulative or in-combination effects on the qualifying interests of any European site are predicted.

6. Mitigation measures

Table 4 presents the qualifying interests (QIs) that were screened in for further assessment, grouped by species (Table 2). For each species, the table identifies the relevant European Site(s) where potential impact pathways exist and outlines the likely mechanisms of effect, such as visual disturbance, above-water noise, or temporary displacement of foraging. Only highly mobile marine mammals and selected seabird species were screened in, reflecting the limited range of pathways from the proposed MUL activities.

Table 4. Summary of screened-in qualifying interests, the relevant European Sites and the potential impact pathways.

Species (QI)	European Site(s) Screened In	Likely Impact Pathways
<i>Phoca vitulina</i> (Harbour Seal)	Donegal Bay (Murvagh) SAC; Ballysadare Bay SAC; Cummeen Strand/Drumcliff Bay SAC; Killala Bay/Moy Estuary SAC	Visual disturbance; above-water noise; temporary foraging displacement
<i>Halichoerus grypus</i> (Grey Seal)	Slieve Tooley / Tormore Island / Loughros Beg Bay SAC	Visual disturbance; survey noise; displacement
Cormorant (<i>P. carbo</i>)	Ardboline & Horse Island SPA; West Donegal Coast SPA	Nesting disturbance; above-water noise
Shag (<i>P. aristotelis</i>)	Inishduff SPA; Inishmurray SPA	Nesting disturbance; noise
Herring Gull (<i>L. argentatus</i>)	Inishmurray SPA	Above-water noise during nesting
Arctic Tern (<i>S. paradisaea</i>)	Inishmurray SPA	Noise disturbance to breeding colony
Razorbill (<i>A. torda</i>)	West Donegal Coast SPA	Noise disturbance during breeding

The following measures are proposed to ensure that no adverse effect on the integrity of any European site occurs. They are consistent with NPWS (2014) guidance, JNCC (2023), and MARA (2025) determination requirements.

6.1 Harbour seal

Surveys within the Harbour Seal foraging range (33.65km, Sharples et al. (2012).

An MMO will be appointed to ensure no vessel or above water noise causes disturbance to Harbour Seals. The survey vessel will not approach haul out sites for Harbour seal closer than 100m as observed by the MMO. It should be noted that the survey vessel will be moving through the intertidal area during high water. At this stage, seals will have abandoned their intertidal haul out sites due to the tidal state.

6.2 Grey seal

Surveys within Grey Seal foraging range (51.29km, Cronin et al. 2011).

An MMO will be appointed to ensure no vessel or above water noise causes disturbance to Grey Seals. The survey vessel will not approach haul out sites for Grey seal closer than 100m as observed by the MMO. It should be noted that the survey vessel will be moving through the intertidal area during high water. At this stage, seals will have abandoned their intertidal haul out sites due to the tidal state.

6.3 Seabirds

The following mitigation measures are designed to avoid or minimise disturbance to nesting bird species through appropriate survey timing, operational controls, and noise-reduction procedures.

To minimise potential above-water-noise-related disturbance or displacement to nesting seabirds associated with Ardboline & Horse Island SPA, West Donegal Coast SPA, Inishduff SPA, Inishmurray SPA, and West Donegal Coast SPA, the mitigation detailed below is proposed.

- Drone surveys will not be undertaken between February and May to avoid potential disturbance of nesting birds.

Mitigation measures address the issues identified by MARA (MUL240012, Oct 2025), specifically visual and above-water disturbance risks associated with vessel and drone activity.

6.4 In-combination effects

Sections 6.1 to 6.4 set out the proposed mitigation to avoid the potential for likely significant effects as a result of:

- Disturbance from vessel presence
- Disturbance from drone activity

As the identified projects (listed in Table 3) are likely to result in the same or very similar noise/disturbance effects, the implementation of the proposed mitigation will act to eliminate any potential for in-combination effects on the qualifying interests of European sites within the Zol of the proposed project.

7. Transboundary effects

Transboundary effects relate to the likelihood of significant effects on a site which is part of the Natura 2000 network but lies outside our national boundaries. Since 1 January 2021 nature conservation areas in the UK (including Northern Ireland) are no longer part of the Natura 2000 network (OPR, 2021).

The ZoI of the proposed project has been estimated and all European sites with the potential for project related impacts have been assessed, including *ex-situ* effects. This process and the subsequent assessment did not identify any potential for transboundary effects.

8. Residual impacts

No residual impacts of the proposed project have been identified or are considered possible.

Residual impacts from vessel, aerial, or acoustic disturbance are not anticipated following implementation of the mitigation measures described herein. This conclusion reflects the updated MARA Screening and Determination Report (2025).

9. Natura Impact Statement Conclusion

In accordance with the requirements of Section 117(6)(a) of the Maritime Area Planning Act 2021 and the Screening Determination (MUL240012, MARA 2025), this NIS concludes that, subject to full implementation of the mitigation measures outlined, the proposed project will not adversely affect the integrity of any European Site, alone or in combination with other plans or projects.

This assessment is based on complete, precise and definitive findings in the light of the best scientific knowledge. It objectively concludes that provided the mitigation measures described in this document are fully implemented, **no adverse effect on the integrity** of any European site will occur.

10. References

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