

Dungarvan, Co. Waterford and Greystones, Co. Wicklow. Request for Observations from Public Bodies MUL240026

Proposed activity:

To conduct a strategic modelling study of water currents and bathymetry along the Southeast Coast of Ireland. The study requires the deployment of up to nine static Acoustic Doppler Current Profilers (ADCPs) at separate locations within the study area. Ancillary instruments, to collect salinity and temperature data, may also be contained within the trawl resistant frames in which the ADCPs will be deployed. Boat based ADCP surveys and a bathymetric survey (multibeam and single beam) are also required. The proposed project is located off the South East coast between Dungarvan, Co. Waterford and Greystones, Co. Wicklow.

BIM Comments:

Fisheries comments:

The AIMU states in its analysis that *‘Due to the limited interaction with the seabed and scale and scope of the project no impact on commercial fisheries is considered possible’*.

It is fair to say that the survey/study methods to be used would be considered by fishers to be at the lower spectrum of any concern.

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. Disturbance to fishing activities is likely to be minimal as BIM can't see a requirement for fishers to stay out of the study areas. However, the risk of damage to static fishing gear and deployed survey equipment is a more realistic one. Instances of this has happen historically, where strings of pots were reported as being towed by survey vessels.

The main comment to make therefore is that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising from such incidents as stated above.

From a fisheries perspective looking at the maps supplied the study areas will overlap with the following main fishery activities.

The study will involve both steaming through areas conducting ADCP, bathymetric surveys (multibeam and single beam), the taking of water samples and the deployment of tidal gauges ('of up to nine static Acoustic Doppler Current Profilers (ADCPs) at separate locations within the study area. Ancillary instruments, to collect salinity and temperature data, may also be contained within the trawl resistant frames in which the ADCPs will be deployed').

According to the application on file, no consultations have taken place (up to the time of submitting the application).

- AREA A – Tramore Bay to Waterford coast: inshore potting for lobster, crab and shrimp plus whitefish trawling and dredging for scallop
- AREA B – Bannow Bay extending to the Hook peninsula in the west to east of Kilmore Quay and the Saltee Islands: inshore potting for lobster, crab and shrimp plus whitefish trawling and dredging for scallop.
- AREA C – Tachumshane lake east to Carnsore point, and north to Rosslare Europort: : inshore potting for lobster, crab
- AREA D – River Slaney/Wexford Harbour to Rosslare and Curacloe: Razor dredging with whelk boats steaming from Wexford town through the survey areas to/from fishing grounds
- AREA E – Black water to Cahore: Whelk pot fishing and razor dredging
- AREA F – Courtown whelk pot fishing
- AREA G – Arklow town Whelk fishermen steaming to/from grounds
- AREA H – Outside of Arklow whelk pot fishing
- AREA I – Brittas Bay: potfishing for lobster, crab and whelk
- AREA J – Wicklow: pot fishing for lobster, crab and whelk
- AREA K – Greystone pot fishing for whelk and whitefish trawling

Some of the areas also overlap with spawning and nursery areas such as for herring and cod.

Therefore, timely notification to notify fishers on the ground, through direct contact using the Irish Fleet Register [Sea-Fishing Boat Licence Applications, Forms and Conditions](#) should be taken. Additional, usual channels of communication, such as Marine Notices, the Producer Organisations such as the IS&EFPO, IIMRO, NIFA, local RIFF, all the relevant harbour port offices and local authority offices, and local media including Marine Times where possible covering the impacted area.

Aquaculture Comments:

Area B overlaps completely with oyster licenced sites in Bannow Bay.

Area D overlaps completely with bottom mussel and oyster licensed sites in Wexford Harbour.

Vessel mounted ADCP (reference VMADCP10) is situated over a licenced bottom mussel site in the middle of Wexford Harbour. The bottom mussel industry and harbour master would need to be contacted in advance so that there is no interference with bottom mussel operations at that site or within the harbour as it is on the main navigation channel.

BIM do not envisage any issues with the remaining vessel mounted ADCP locations in regard to aquaculture activities and a normal notice to mariners would suffice.

In relation to any bathymetric scans within Bannow Bay and Wexford harbour the applicant would need to be cognisant of the presence of structures such as oyster trestles and navigational poles close to oyster licenced sites which will not be navigable directly above them even on high tides.

For all bottom mounted ADCP's there are some overlaps with the proposed deployment (see Figure 1).

- FADCP 8 north of Wicklow overlap with a historical bed. However, no settlement has been observed in this area since the early 2000s.
- FADCP 5 north of Cahore Point overlap with historical seed mussel beds exploited in 2018, 2019 and 2021.
- FADCP 4 located between the Long Bank and the Lucifer Bank east of Wexford Harbour overlap with the south end of the seed mussel bed found in 2025 and exploited in 2022 and 2019.

The main issue for those is the deployment time schedule (during the seed fishing season) if a bed is identified in those locations and that there will be no interference with seed bed formation/prevention of seed harvesting. Note, traditionally Mussel seed Fisheries open between the end of August to the end of November.

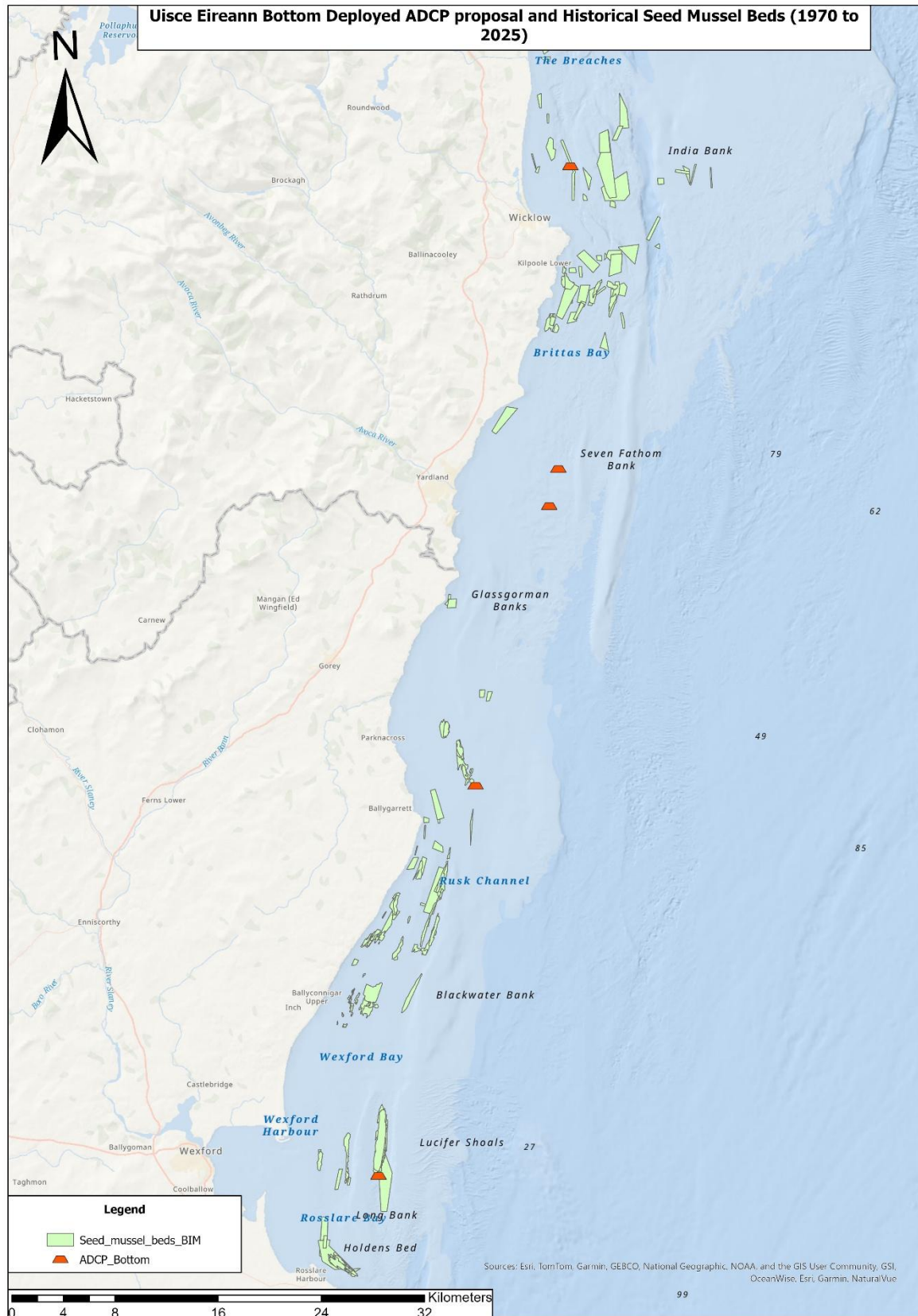


Figure 1. Uisce Eireann Bottom Deployment ADCP proposal and Historical Seed Mussel Beds (1970 to 2025).

There is no reference to shellfish designated water bodies as a protected water body in the documentation.

There is no reference to vessel spills possibly impacting on shellfish at aquaculture sites. Thus, all preventative measures must be in place to prevent spills and BIM would need to be contacted immediately if there are any spills within or close to shellfish aquaculture licenced sites viz Bannow Bay oyster farms and Wexford Harbour mussel and oyster farms.

BIM notes that MARA has queried the following:

Figure 1 on page 5 of the AIMU states that the locations for both the bottom mounted and vessel mounted ADCPs are provisional. Please provide the reason(s) why these locations are provisional.

The response from applicant was:

2. Final ADCP Locations

Final locations would be subject to confirmation during the deployment process when redeployments checks are undertaken to ensure sites can be accessed safely and will allow for effective data capture (e.g. for fixed ADCPs, ensure there are no local conditions which would cause frame to drag or tip over). Given the dynamic nature of the environments, this is necessary, however it would be envisioned that final locations would be within the immediate vicinity.

BIM would expect that no overlap of vessel mounted ADCP with oyster farms in Bannow would occur and that due to an overlap in Wexford Harbour (VMADCP10) that the mussel industry is kept informed of the details of the proposed vessel activity (dates, times, location and not preventing normal bottom mussel operations).

As for bottom mounted ADCP locations over seed beds as stated above there is some overlap, see Figure 1. Therefore, timely notification to notify fishers on the ground is necessary through the communication channels highlighted above in fisheries comments.