

**Re: MUL250010 – Minded to Determine Notice – Response to proposed licence conditions**

Dear Sir/Madam,

We refer to the Minded to Determination letter issued by the Maritime Area Regulatory Authority (MARA) in respect of Maritime Usage Licence reference MUL250010, together with the proposed licence conditions. Gas Networks Ireland confirms that we accept all proposed licence conditions as set out in the draft Maritime Usage Licence. For completeness, and to assist MARA in finalising the licence, we have provided comments on a small number of conditions where clarification of intent may be helpful.

A table is provided below setting out our responses to Condition 24(i) and Condition 27(i) only. These comments are intended to clarify the scope of activities proposed under the licence and to support proportionate and effective implementation of the conditions. No comments are provided in respect of the remaining conditions, which are accepted as drafted.

Conditions	Comments
<p>24. Marine Mammals</p> <p>(i) The Holder shall appoint a marine mammal observer(s) for the purposes of overseeing the Permitted Maritime Usage. The Holder shall ensure the marine mammal observer(s) shall satisfy the requirements of the most up to date national guidance. During the activity the Holder shall comply with the directions of the marine mammal observer(s).</p> <p>(ii) The Holder shall implement risk control and mitigation measures for marine mammals in strict accordance with the most up to date national guidance.</p> <p>(iii) The Holder shall, within 30 days of the completion of the Permitted Maritime Usage, forward a report of the marine mammal observer(s) operations and mitigation undertaken, to <a href="mailto:offshore@npws.gov.ie">offshore@npws.gov.ie</a> and <a href="mailto:compliance@mara.gov.ie">compliance@mara.gov.ie</a></p> <p>(iv) The Holder shall publish the report and recording and data forms on their website within 60 days of</p>	<p>Condition 24(i) requires the appointment of a Marine Mammal Observer (MMO) “for the purposes of overseeing the Permitted Maritime Usage.” As currently drafted, the condition does not specify which activities require MMO supervision and could be interpreted as applying to all survey activities.</p> <p>We wish to clarify our intended approach. Gas Networks Ireland proposes to have a suitably qualified MMO on board vessels during geophysical and geotechnical survey activities, where acoustic sources are deployed and where MMO oversight is standard practice in accordance with national guidance.</p> <p>Other environmental survey activities proposed under this licence, including benthic grab sampling, water sampling and camera drop-down surveys, do not involve the use of acoustic noise sources and do not typically require MMO supervision. Accordingly, we are not proposing to have an MMO on board during these activities.</p>

555744, a bhfuil IE3323308KH mar uimhir CBL aici agus a bhfuil a hoiig chlaraithe ionnaithe ar Bhothar na nOibreacha Gais, Corcaigh, T12 RX96. Gas Networks Ireland is a designated activity company, limited by shares, incorporated in Ireland with registered number 555744, VAT number IE3323308KH and has its registered office at Gasworks Road, Cork, T12 RX96.

**Stiúrthóirí/ Directors:** Kevin Toland (Chairperson), John Curran, Fiona Egan, Saoirse Fahey, Keith Harris, Liz Joyce, Geraldine Kelly, Keara Robins.

<p>completion of the Permitted Maritime Usage unless otherwise agreed with the Grantor</p> <p>Reason: To ensure protection of the marine environment and protected species.</p>	<p>We trust that this approach aligns with established practice and the mitigation principles set out in the latest National Guidance, and we would welcome MARA's confirmation.</p>
<p>27. In-combination effects</p> <p>(i) Prior to the commencement (time frame can be added if required) of the Permitted Maritime Usage, the Holder shall coordinate with other authorisation holders carrying out geophysical, seismic and geotechnical activities within a 20 km radius of the Licensed Area.</p> <p>(ii) Where a vessel to vessel distance of greater than 20 km cannot be maintained with respect to geophysical, seismic and geotechnical activities, the Holder shall co-ordinate with other authorisation holders to prevent temporal overlap of the activities. Where the Holder can submit evidence that there is a vessel to vessel distance of greater than 20 km, no temporal co-ordination of activities is required. Where the Holder becomes aware of temporal overlap that cannot be resolved within the prescribed distance, the Holder shall notify the Grantor who shall determine the timing of activities.</p> <p>(iii) Where the Holder becomes aware of temporal overlap that cannot be resolved within the prescribed distance, the Holder shall notify the Grantor who shall determine the timing of activities</p> <p>(iv) Records of all engagements held, and agreements reached, if any, shall be maintained by the Holder and made available to the Grantor if requested</p> <p>Reason: To ensure protection of the marine environment and protected species and habitats.</p>	<p>Condition 27(i) requires coordination with other authorisation holders carrying out "geophysical, seismic and geotechnical activities" within a 20 km radius of the Licensed Area. We note that the term "geotechnical activities" is not defined within the proposed licence.</p> <p>We wish to clarify that ecological grab sampling and intertidal sampling undertaken for environmental survey purposes should not be considered part of geotechnical works. These activities are low-impact, non-acoustic in nature and are distinct from intrusive geotechnical investigations such as borehole drilling or cone penetration testing.</p> <p>Without this clarification, the condition could be overly restrictive in practice and may unduly constrain survey planning, particularly given the weather and tide-dependent nature of ecological survey activities. We therefore wish to outline our intended approach. Gas Networks Ireland proposes that coordination requirements under Condition 27(i) relate to geophysical, seismic and intrusive geotechnical activities only.</p>

We note that the proposed licence conditions proceed from Condition 20 to Condition 22, with no Condition 21 included. We assume this may be a clerical or numbering error.

Yours faithfully,



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Tom Hegarty