



November 12, 2025

licence@mara.gov.ie

RE: Request for Observations – MUL Reference: MUL250010

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application from Gas Networks Ireland for a Maritime Usage Licence to conduct marine Site Investigations (SI) and environmental surveys within the Shannon Estuary adjacent to the townlands of Shannakea Beg, Cahiracon, Foynes Island, Leahys and Corrig, for the Strategic Gas Emergency Reserve Project.

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 site investigations and environmental surveys** are 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.

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

The MI observed that the proposed licence area overlaps a Special Area of Conservation and Special Protected Area and while the proposed survey areas do coincide with areas where fishing and aquaculture activities take place, the survey operations should not substantially interfere with such activities. It is assumed that necessary notices to mariners / fishing vessels will be made regarding the deployment of devices, sampling, geophysical and bathymetric mapping activities, noting need for appropriate care to be taken regarding Unexploded Ordnance.

The MI notes the potential for cumulative impacts between these and other survey activities that may be active in the vicinity.

BIM noted the reference to aquaculture and fishing activities in the Assessment of Impacts of the Maritime Usage (AIMU) report and mentioned the commercial fisheries activities occur

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

T +353 (0)23 8859500

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within the Shannon Estuary and that local licensed fishing vessels most frequently partake in pot fishing, gillnets, and tangle nets. Licenced aquaculture areas are also known to overlap with the proposed MUL area, and several sections of the Shannon Estuary are also designated under the Shellfish Waters Directive, although not many areas overlap with the proposed MUL Area.

BIM's main concern is due to suspended sediments from survey activity. However, BIM is not aware of any current aquaculture activity on these aquaculture sites at present. As noted in the MUL application and AIMU report the nearest active designated shellfish waters at Ballylongford Shellfish waters is 22km away from the proposed survey area and any suspended sediments would have little impact on these shellfish sites downriver. The AIMU report also identifies the temporary nature of the activity will not have significant impact on commercial fishery activity in the licence area.

BIM recommend timely notification of fishers on the ground through the usual channels of communication, such as Marine Notices, the Producer Organisations, all the relevant harbour port offices and local authority offices, and local media where possible covering the impacted area.

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 **proposed site investigations and environmental surveys** 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 would like to point out that commercial fishing activities occur within the Shannon Estuary, including pot fishing. 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.

The AIMU Report sets out that potential disturbances to commercial fisheries activity will be of a temporary nature and will not have a significant impact. However, DAFM would stress that relevant local fishing organisations should 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 seeks confirmation that where there are any indirect impacts on traditional fishing grounds 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