

Maritime Usage Licence and Planning Advisory Directorate			
To:	Licensing Team	From:	Dr Ciar O'Toole
Permitted Maritime Usage Licence Application:	MUL250010		
Applicant:	Gas Networks Ireland		
Title:	Response from the applicant on Minded to Determination and Reasons for the Conditions		

The Senior Marine Advisor has considered all of the issues raised in the submission to the Minded to Determination letter submitted by the applicant dated 9 February 2026.

Both queries raised by the applicant relate to the reasons given for the specific conditions, as they look to clarify the extent of the protection afforded to the marine habitats and species considered.

Specific Condition 24 Marine Mammals

(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).

(ii) The Holder shall implement risk control and mitigation measures for marine mammals in strict accordance with the most up to date national guidance.

(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 offshore@npws.gov.ie and compliance@mara.gov.ie

(iv) The Holder shall publish the report and recording and data forms on their website within 60 days of completion of the Permitted Maritime Usage unless otherwise agreed with the Grantor

Reason: To ensure protection of the marine environment and protected species

Gas Networks Ireland minded to submission:

GNI asks for clarification regarding the use of an MMO. This relates to clarifying if an MMO is required for all activities or just those that produce a noise in the marine environment.

MARA Response:

MARA can confirm that an MMO is only required for geophysical and geotechnical survey activities where acoustic sources are deployed and MMO oversight is standard practise in line

with national guidance. Other environmental survey activities that do not involve an acoustic noise source do not require an MMO to be on board during these activities.

Recommendation: No change required to the condition

Specific Condition 27 In-combination effects

(i) Prior to the commencement 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.

(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.

(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.

(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

Reason: To ensure protection of the marine environment and protected species and habitats.

Gas Networks Ireland minded to submission:

GNI asks for clarification regarding what activities fall under geotechnical activities in relation to this condition.

MARA Response:

MARA can confirm that GNI's interpretation that the condition relates to intrusive geotechnical activities is correct. Ecological grab sampling and intertidal environmental survey work are not included as part of the works considered under this condition.

Recommendation: No change required to the condition