

From: mmoreno@seatec.be
Sent: Friday 30 January 2026 10:34
To: MARA Licence
Subject: Re: MUL230036 - RAI Extension granted

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Dear Ms. Staunton and License Team,

First of all, thank you for the time extension. Happily all our crew has finally been released from Venezuela after 7 months.

We refer to your correspondence dated 08 December 2025 requesting additional information under Section 117(3) of the Maritime Area Planning Act 2021 in relation to Maritime Usage Licence application reference MUL230036.

Please find below SEATEC's updated response, including clarification on the scope and purpose of the proposed activities:

1) Equipment proposed and clarification of survey scope

SEATEC confirms that the **primary site investigation and seabed survey were completed in May 2023.**

The activities currently proposed under application MUL230036 **do not constitute a new site investigation or wide-area seabed survey.**

The purpose of the forthcoming operations is limited to:

- Identifying **specific, already-known seabed location** within the previously surveyed area; and
- **Synchronizing and calibrating USBL positioning data with existing multibeam and side scan sonar imagery**, in order to ensure accurate positioning of subsea equipment during recovery operations.

The operations will be conducted from the Offshore Supply Vessel **N35** (Panama flag), classed **DNV/GL 1A1 EO DPS 2**, IMO 8119637, with DP2 capability to maintain stable station-keeping.

The equipment to be used is limited to:

- **T50 Reson Multibeam Echo Sounder (MBES)**, operated on a targeted and intermittent basis solely for positional confirmation;
- **EdgeTech 4200 Side Scan Sonar**, used selectively for visual correlation with existing seabed data where required; and

- **Sonardyne Ultra-Short Baseline (USBL) acoustic positioning system**, used to synchronize acoustic positioning with sonar imagery for precise localization of known seabed features.

No sub-bottom profiler, airguns, or other impulsive acoustic sources will be deployed.

2) Revised Annex IV Risk Assessment – Underwater Noise

A revised Annex IV Risk Assessment is submitted herewith and reflects the **limited and targeted nature** of the proposed acoustic activities.

The assessment specifically considers underwater noise arising from:

- a) The intermittent use of MBES and side scan sonar for positional confirmation only; and
- b) The operation of the USBL positioning system for synchronization and tracking purposes.

Given that:

- The broader site investigation was completed in 2023;
- Acoustic sources are non-impulsive and of low to moderate output;
- Operations are short in duration, spatially confined, and intermittent; and
- DP2 station-keeping minimizes repeated passes and unnecessary acoustic exposure,

the assessment concludes that potential underwater noise impacts are **localized, temporary, and of low environmental risk**, with appropriate mitigation measures applied.

3) Annex IV species and derogation requirements

SEATEC confirms that, following assessment, **no derogation under Regulation 54** of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, is required.

The proposed activities are not expected to result in the deliberate disturbance, injury, or destruction of strictly protected Annex IV species. The limited use of non-impulsive acoustic equipment for positional verification and USBL synchronization will be conducted in accordance with best environmental practice and the mitigation measures outlined in the revised Annex IV Risk Assessment.

4) Confirmation of applicable schedules under the Act

We confirm that this application is made under **Schedule 7(3)** and **Schedule 7(7)** of the Maritime Area Planning Act 2021, as amended, in respect of:

- Marine environmental surveys limited to positional verification and equipment synchronization; and
 - The removal of substances or objects from the seabed.
-

We trust that the above clarification addresses MARA's request for additional information. Should any further clarification be required, please do not hesitate to contact us.

Yours faithfully,

Miguel Moreno

Operations and Project Management

Seatec

[Verversrui 15, 2000 Antwerpen, Belgium](#)

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From: MARA Licence <licence@mara.gov.ie>

Sent: Wednesday, January 14, 2026 10:35 AM

To: mmoreno@seatec.be <mmoreno@seatec.be>; MARA Licence <licence@mara.gov.ie>

Subject: MUL230036 - RAI Extension granted

Dear Miguel,

Thank you for informing MARA of these unfortunate circumstances. We hope you are doing well during this difficult time.

We have granted a four-week extension to provide the requested additional information. The revised deadline for your submission is now 11 February 2026.

Kind regards,

Joanne Staunton

Licence Authorisation Team

MARA

An tÚdarás Rialála Limistéir Mhuirí (MARA)

Maritime Area Regulatory Authority

**An Dara hUrlár, Teach Menapia, Páirc Gnó Dhraighní,
Draighneach, Loch Garman, Y35RF29.**

2nd Floor, Menapia House, Drinagh Business Park,

Drinagh, Wexford, Y35RF29.
W: www.maritimeregulator.ie



From: mmoreno@seatec.be <mmoreno@seatec.be>
Sent: Saturday 10 January 2026 21:53
To: MARA Licence <licence@mara.gov.ie>
Subject: Re: Reminder: MUL230036 - Request for Additional Information

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Dear MARA team,

Please be noticed the Seatec team was taken hostage in Venezuela with the N35 vessel last summer.

My self was released just this week after 7 months. The rest of the crew remains illegally detained, and I will need more time to update this application. We definitely don't want to drop this application after such a long delay from MARA. Our legal team will also assist us.

Kind regards,

Miguel Moreno

Operations and Project Management
Seatec

[Verversrui 15, 2000 Antwerpen, Belgium](#)

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From: MARA Licence <licence@mara.gov.ie>
Sent: Thursday, January 8, 2026 3:21 PM
To: mmoreno@seatec.be <mmoreno@seatec.be>
Cc: MARA Licence <licence@mara.gov.ie>
Subject: Reminder: MUL230036 - Request for Additional Information

Dear Applicant,

This is a gentle reminder that the deadline to submit the requested additional information is tomorrow, January 9, 2026.

Best regards

Joanne Staunton
Licence Authorisation Team
MARA

An tÚdarás Rialála Limistéir Mhuirí (MARA)

Maritime Area Regulatory Authority

**An Dara hUirlár, Teach Menapia, Páirc Gnó Dhraighní,
Draighneach, Loch Garman, Y35RF29.**

2nd Floor, Menapia House, Drinagh Business Park,
Drinagh, Wexford, Y35RF29.

W: www.maritimeregulator.ie



From: MARA Licence <licence@mara.gov.ie>

Sent: Monday 8 December 2025 12:41

To: mmoreno@seatec.be

Cc: MARA Licence <licence@mara.gov.ie>

Subject: MUL230036 - Request for Additional Information

Dear Applicant,

Please find attached a request for additional information in relation to your application MUL230036.

Kind regards,

Joanne Staunton
Licence Authorisation Team
MARA

An tÚdarás Rialála Limistéir Mhuirí (MARA)

Maritime Area Regulatory Authority

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MARA

An tÚdarás Rialála Limistéir Mhuiri
Maritime Area Regulatory Authority