

SEATEC NV

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Maritime Area Regulatory Authority

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

By email: licence@mara.gov.ie

22/05/2026

Re: Response to Request for Additional Information — Section 117(3) MAP Act 2021 Maritime Usage Licence Application Reference: MUL230036

Dear Ms O'Toole,

SEATEC NV refers to MARA's Request for Additional Information dated 24 April 2026 issued under Section 117(3) of the Maritime Area Planning Act 2021 in relation to licence application MUL230036, and is pleased to submit the following response.

Enclosed with this letter are the documents listed in the index below, which together address each of the five points raised in MARA's RAI. SEATEC has endeavoured to provide the level of detail requested and to engage constructively with all aspects of the RAI, and remains available to provide any further clarification that MARA may require.

1. Index of Documents Enclosed

Point 1	Wreck Identification Report — SEATEC-MUL230036-WRECKID-01
Point 2	Heritage Assets Policy 1 Assessment — SEATEC-MUL230036-HERITAGE-02
Point 3	Revised SISAA Report — SEATEC-MUL230036-SISAA-02 (Author: Matthias Leroy, MSc Marine and Lacustrine Sciences, University of Ghent)
Point 4	Annex IV RAAIVS Author Qualifications Addendum — SEATEC-MUL230036-RAAIVS-QUALS-01 (Author: Ben Lemeire, Survey Superintendent)
Point 5	Policy Consistency Statements — SEATEC-MUL230036-POLICY-01
Supporting CVs	Capt. Pim de Rhodes (Seatec NV) Capt. Guy Pochet, SCR (Sub-Tech / Seatec NV) Ben Lemeire (BRO Solutions) Matthias Leroy (Freelance)

2. Preliminary Observations

2.1 Regulatory history of this application

SEATEC wishes to draw MARA's attention to the regulatory history of this project, which predates MARA's establishment and which SEATEC considers relevant context for the assessment of this application.

The SS Ohio project has been subject to Irish regulatory oversight since 2023. Prior to MARA's establishment under the Maritime Area Planning Act 2021, the Irish Coast Guard was the competent authority for the oversight of offshore salvage operations of this nature in Irish maritime zones. SEATEC engaged with the Irish Coast Guard at an early stage of the project and obtained the necessary approvals from that authority in relation to the proposed operations. The Irish Coast Guard's approval — granted following its own assessment of the proposed activities — represents a prior determination by a competent Irish regulatory authority that the operations as proposed are consistent with Irish regulatory requirements.

The subsequent establishment of MARA and the requirement to obtain a Maritime Usage Licence under the MAP Act 2021 reflects a development of the regulatory framework, not a reversal of the position previously taken by the Irish Coast Guard. SEATEC acknowledges MARA's authority under the MAP Act 2021 and has engaged fully with the MUL application process. It respectfully submits, however, that the existing Irish Coast Guard approval is a material consideration in MARA's assessment, demonstrating that the proposed activity has already been subject to Irish regulatory scrutiny and found to be acceptable in principle by a competent authority.

SEATEC's current Tier 2 Oil Spill Response Plan has been approved by the Irish Coast Guard and remains in force. This is referenced throughout the supporting documentation enclosed with this response.

2.2 SEATEC's engagement with the application process

SEATEC has maintained this application since 2023 and has engaged in good faith with all statutory consultees, including MARA, the Irish Coast Guard, the EPA, the National Parks and Wildlife Service, the National Monuments Service, and the Receiver of Wreck. SEATEC has responded to all requests for additional information and has supplemented the application with updated documentation — including the revised Annex IV Risk Assessment submitted on 23 April 2026 — in advance of MARA's formal RAI.

SEATEC is committed to full compliance with all conditions that MARA may attach to a Maritime Usage Licence, and to ongoing transparent communication with MARA throughout any operational period.

3. Notes on Specific Points in the RAI

Point 1 — Wreck Identification:

The Wreck Identification Report addresses in detail the evidence base for SEATEC's conclusion that the wreck at position 51°N 52.720' / 014°W 16.880' corresponds to the SS Ohio. SEATEC draws MARA's attention in particular to Section 1.4 of that report, which addresses the physical recovery

of cargo material consistent with the documented manifest of the SS Ohio, and to Section 1.5, which sets out the basis for concluding that the position discrepancy with the Wreck Inventory of Ireland Database reflects the imprecision of the historical record rather than a misidentification of the wreck.

Point 2 — Heritage Assets Policy 1:

The Heritage Assets document addresses the jurisdictional framework in detail. SEATEC acknowledges Ireland's ratification of the 2001 UNESCO Convention on the Protection of Underwater Cultural Heritage in December 2025, and has addressed the implications of that ratification for the present application in Section 2.1 of the Heritage Assets document. SEATEC's position, in summary, is that the Convention's Article 10 EEZ regime establishes a framework of international coordination rather than conferring unilateral sovereign jurisdiction over all commercial activities involving underwater cultural heritage at 142 nm, and that this conclusion is consistent with the cooperative character of the Convention and with Ireland's own published statements upon ratification.

Points 3, 4, and 5:

The enclosed documents address each of these points in full. SEATEC draws MARA's attention to the qualifications sections included in both the revised SISAA (Section 8) and the Annex IV RAAIVS Author Qualifications Addendum, which together address the requirements of Points 3(b) and 4 of the RAI.

SEATEC trusts that this response, together with the enclosed documents, provides MARA with the information required to proceed to a determination on application MUL230036. Should MARA require any further information or clarification, SEATEC is available at short notice.

Yours faithfully,

Capt. Pim de Rhodes

Founder and Managing Director, Seatec NV

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