

REVISED SUPPORTING INFORMATION FOR SCREENING FOR APPROPRIATE ASSESSMENT

Maritime Usage Licence Application MUL230036

SS Ohio — Cargo Recovery Operations, Irish Exclusive Economic Zone

Document Reference	SEATEC-MUL230036-SISAA-02
Prepared by	Matthias Leroy, MSc Marine and Lacustrine Sciences (University of Ghent)
Application Reference	MUL230036
Date	May 2026
Version	Revised — v02
Status	Final — Submitted to MARA in response to RAI dated 24 April 2026

1. Introduction

1.1 Purpose and Scope

This document constitutes the Revised Supporting Information for Screening for Appropriate Assessment (SISAA) prepared by SEATEC NV in response to the Request for Additional Information issued by the Maritime Area Regulatory Authority (MARA) on 24 April 2026 under Section 117(3) of the Maritime Area Planning Act 2021, in relation to Maritime Usage Licence application MUL230036.

This revised SISAA supersedes the SISAA previously submitted with the original licence application. It has been prepared to provide the additional detail requested by MARA, specifically to enable MARA to undertake screening to determine whether an Appropriate Assessment (AA) is required for the proposed maritime usage, either alone or in combination with other plans or projects, in respect of any relevant European site, having regard to that site's conservation objectives.

This report has been prepared by Matthias Leroy, MSc in Marine and Lacustrine Sciences (University of Ghent, 2010), whose academic formation included Integrated Coastal Zone Management, Marine Legislation, Biological Oceanography, and GIS, and who has over twelve years of professional experience in offshore survey operations, wreck removal, environmental monitoring, and geophysical survey including multiple offshore wind energy projects subject to mandatory Habitats Directive screening. A summary of Mr Leroy's qualifications and professional experience is included in Section 8 of this report.

1.2 Legal and Regulatory Framework

This SISAA has been prepared in accordance with:

- Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), Articles 6(3) and 6(4);
- European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended;

- Maritime Area Planning Act 2021 (MAP Act), as amended;
- MARA Guidance Note for Applicants Applying for a Maritime Usage Licence (MUL);
- Circular NPW 1/10 and associated Department of Housing, Local Government and Heritage guidance on Appropriate Assessment;
- European Commission (2021) Assessment of implications for Natura 2000 sites — Methodological guidance;
- National Marine Planning Framework (NMPF) of Ireland.

This SISAA has been prepared in line with current Irish and EU guidance for Appropriate Assessment screening, as required by MARA.

2. Project Description

2.1 Project Location

The proposed maritime usage is the recovery of non-ferrous metal cargo from the wreck of the SS Ohio, located at position 51°N 52.720' / 014°W 16.880', at a water depth of approximately 330 metres, approximately 142 nautical miles west-southwest of the Irish coastline. The site is situated within the Irish Exclusive Economic Zone (EEZ) but is well outside Ireland's Territorial Sea (12 nm) and Contiguous Zone (24 nm).

2.2 Nature of the Proposed Activity

The proposed activity consists of the commercial recovery of non-ferrous metal cargo from the wreck using a surface crane-based grab system deployed from the offshore supply vessel N35. The key operational parameters are:

- Vessel: N35 (IMO 8119637), 80-metre offshore supply vessel, DP2 dynamic positioning, Panama flag.
- Positioning: DP2 dynamic positioning throughout operations — no anchors deployed.
- Crane system: 100-ton crane with cable-operated mechanical grabs (4 m³ primary; 2.5 m³ secondary). No hydraulics. Grab equipped with camera and USBL transponder.
- ROV deployment: Two ROVs with cameras and USBL transponders for site assessment and monitoring.
- Acoustic systems: Reson SeaBat T50 MBES (200–400 kHz, non-impulsive FM/CW); EdgeTech 4200 SSS (300/600 kHz); Sonardyne USBL (20–34 kHz, continuous, non-impulsive). No sub-bottom profiler, airguns, sparkers, or impulsive acoustic sources.
- Duration: Operations scheduled during summer season; estimated up to two years, discontinuous (suspended during winter months).
- Target cargo: Non-ferrous metals (brass, copper, zinc) from holds 1, 3, and 4 of the wreck.

2.3 In-combination Considerations

SEATEC is not aware of any other plans or projects currently proposed, in preparation, or under licence that would result in maritime usage within or proximate to the SS Ohio wreck site at 51°N 52.720' / 014°W 16.880'. The site is approximately 142 nautical miles from the Irish coast, in open Atlantic waters, with no proximate offshore energy installations, aquaculture operations, or other licensed maritime usages. No in-combination effects with other plans or projects are therefore identified.

3. Identification of Relevant European Sites

3.1 Natura 2000 Network in the Irish EEZ

A review of the Natura 2000 network as mapped by the National Parks and Wildlife Service (NPWS) and the European Environment Agency confirms that there are no Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) designated at or proximate to the project site at 51°N 52.720' / 014°W 16.880'. The site is located approximately 142 nautical miles from the Irish coastline, in the open Atlantic.

The nearest SACs designated for marine and coastal habitats are located in the inshore zone along the western Irish coast. The nearest offshore Natura 2000 designations are those associated with reef habitats and seabird colonies in inshore and nearshore waters, at distances substantially exceeding 100 nautical miles from the project site.

The European Sites within the Irish EEZ most relevant to consideration in this context are those designated for pelagic and wide-ranging species, including certain cetacean species whose home ranges extend into offshore Atlantic waters. These are addressed in Section 4 below.

3.2 Relevant Conservation Objectives

Given the absence of any designated Natura 2000 site at or proximate to the project location, the screening analysis focuses on whether the proposed activity could give rise to effects on qualifying interests or conservation objectives of the nearest relevant European Sites through pathways of influence — specifically, through potential effects on wide-ranging species (primarily cetaceans) whose ranges extend into the operational area.

4. Assessment of Potential Effects on European Sites

4.1 Identification of Potential Impact Pathways

The following potential impact pathways have been identified and are assessed in this section:

- Acoustic disturbance from subsea positioning and imaging equipment — potential to disturb cetaceans or other Annex IV species present in the operational area.
- Physical disturbance to the seabed — potential effects on benthic habitats.
- Vessel presence and surface noise — potential disturbance to seabirds or marine mammals.
- Accidental pollution — potential effects from fuel spill or release of cargo material.

4.2 Acoustic Disturbance

The acoustic equipment proposed for deployment consists exclusively of non-impulsive, continuous-wave or frequency-modulated systems: the Reson SeaBat T50 MBES, the EdgeTech 4200 SSS, and the Sonardyne USBL positioning system. No impulsive sources — sub-bottom profilers, airguns, sparkers, or boomers — are proposed.

The source levels of these systems are well-characterised in the scientific and technical literature. Non-impulsive acoustic systems of this type, operating in the frequency ranges specified, do not produce the instantaneous peak pressure levels associated with injury or mortality risk to marine mammals. The applicable threshold criteria under NPWS (2014) Guidance and Southall et al. (2019) Marine Mammal Noise Exposure Criteria for non-impulsive sources confirm that the zone of potential behavioural disturbance for these systems is limited in extent, and the probability of injury or permanent hearing impairment is negligible.

The operational area is approximately 142 nautical miles from the nearest Natura 2000 site. Any individual cetacean that might experience a degree of temporary behavioural disturbance within the

immediate operational zone would be able to move freely away from the source. The effect would be temporary, reversible, and of no significance at the population level for any qualifying interest of any European Site.

A detailed species-specific assessment of acoustic effects on Annex IV cetacean species, including bottlenose dolphin, common dolphin, harbour porpoise, and relevant whale species, is provided in the Revised Annex IV Risk Assessment for Annex IV Species (RAAIVS), document reference SEATEC-MUL230036-RAAIVS-01, submitted concurrently with this report.

4.3 Physical Disturbance to the Seabed

The seabed at the project site is composed predominantly of soft clay at approximately 330 metres depth. Physical disturbance will be confined to the footprint of the SS Ohio wreck and the immediately surrounding cargo debris field. Operations will not extend beyond the defined wreck site.

The seabed at this location and depth does not constitute a Priority Habitat under Annex I of the Habitats Directive. Soft-sediment deep-water habitats of this type, while forming part of the broader marine ecosystem, are not designated as qualifying interests of any Natura 2000 site at this location or within any area that could reasonably be considered within the zone of influence of the operations. The physical disturbance is highly localised, temporary in the context of the operational period, and will not affect any protected habitat.

4.4 Vessel Presence and Surface Noise

Vessel traffic noise from the N35 operating in the open Atlantic at 142 nm from the Irish coast is assessed as having no potential for significant effects on any European Site. The vessel will operate for discontinuous periods subject to weather, and its acoustic footprint in the context of background shipping noise in North Atlantic waters is not distinguishable in terms of significance from normal commercial maritime traffic.

4.5 Accidental Pollution

The SS Ohio is a coal-fired steam vessel; no residual liquid petroleum fuel is present in the wreck. The risk of hydrocarbon release from the wreck itself is therefore negligible. Fuel carried by the N35 is covered by a Tier 2 Oil Spill Response Plan (OSRP), approved by the Irish Coast Guard, which has been prepared in accordance with SOLAS and SOPEP requirements. The probability of a significant fuel release is low, and the OSRP provides an appropriate response framework. In the event of any accidental fuel release, the distance of 142 nm from the Irish coast means that any impact on nearshore Natura 2000 sites through direct oil contact is highly improbable.

5. Screening Conclusion

On the basis of the information presented in this SISAA, SEATEC concludes that the proposed maritime usage — the recovery of non-ferrous metal cargo from the SS Ohio at 51°N 52.720' / 014°W 16.880' — will not have a significant effect on any European Site (Natura 2000 site), either alone or in combination with other plans or projects, having regard to the conservation objectives of those sites.

The grounds for this conclusion are:

- No Natura 2000 site is present at or proximate to the project location.
- The potential pathways of effect — acoustic disturbance, seabed disturbance, vessel noise, and accidental pollution — have been assessed and none is identified as capable of resulting in a significant effect on the qualifying interests or conservation objectives of any European Site.

- Acoustic impacts are confined to non-impulsive systems with limited zones of influence; any disturbance to individual cetaceans would be temporary, reversible, and not significant at the population level.
- Physical disturbance is confined to the wreck footprint, does not affect protected habitats, and is not connected to any Natura 2000 site by any plausible pathway.
- No in-combination effects with other plans or projects have been identified.

It is therefore SEATEC's assessment that a full Appropriate Assessment under Article 6(3) of the Habitats Directive is not required. MARA may proceed on the basis that the proposed activity is unlikely to have a significant effect on any European Site, either alone or in combination with other plans or projects.

6. Mitigation and Monitoring Measures

The following measures will be implemented throughout the operational period and will support the conclusions of this screening assessment:

- DP2 dynamic positioning throughout: eliminates anchor deployment and associated seabed disturbance beyond the wreck footprint.
- Acoustic system use limited to non-impulsive, continuous-wave or FM equipment: no impulsive sources will be deployed.
- Marine mammal visual monitoring: a trained visual observer will maintain a watch for marine mammals during acoustic system operation periods.
- Soft-start procedures: acoustic systems will be ramped up gradually rather than activated at full source level.
- Operations limited to daylight hours where practicable, to support marine mammal monitoring.
- Tier 2 Oil Spill Response Plan in place and approved by the Irish Coast Guard, providing a proportionate response framework for any accidental fuel release.
- Regular ROV surveys of the wreck and immediate surrounding area throughout the operational period to monitor seabed conditions.

7. Ongoing Reporting Commitments

SEATEC commits to ongoing environmental monitoring and reporting to MARA throughout the operational period, including:

- Notification to MARA of any unexpected observations of protected species or habitats within the operational area.
- Compliance with any environmental conditions attached to Maritime Usage Licence MUL230036 by MARA.
- Post-operational environmental report following the conclusion of each operational season, to be submitted to MARA within 60 days of ceasing operations.

8. Qualifications of the Author

This SISAA has been prepared by Matthias Leroy. A summary of his qualifications and relevant professional experience is set out below, as required by MARA's Guidance Note for Applicants applying for a Maritime Usage Licence (MUL).

Academic Qualifications:

- MSc in Marine and Lacustrine Sciences, University of Ghent, Belgium (2008–2010). Principal subjects relevant to this assessment: Integrated Coastal Zone Management; Marine Legislation; Biological Oceanography; Geology, Geophysics and Oceanography; GIS. Master's thesis: Niche models in marine invasion biology.
- BSc in Biology, University of Ghent, Belgium (2005–2008). Principal subjects: Biology of Vertebrates; Biology of Invertebrates; Physics; Chemistry.

Professional Experience Relevant to This Assessment:

Mr Leroy has over twelve years of professional experience as a Lead Surveyor, Party Chief, and Survey Specialist in the offshore sector, with direct involvement in multiple offshore wind energy construction projects — including Borssele (Netherlands), Norther (Belgium), East Anglia 1 (UK), and others — where Appropriate Assessment screening under the EU Habitats Directive is a mandatory pre-construction regulatory requirement. This experience has provided practical familiarity with the application of the Habitats Directive framework, the identification of qualifying interests of Natura 2000 sites, the assessment of potential effects on Annex IV species from subsea acoustic operations, and the preparation of environmental compliance documentation for submission to national competent authorities.

Mr Leroy additionally holds over two years' professional experience as a Metocean Field Engineer (Gems Met, 2011–2013) conducting real-time environmental monitoring for major dredging projects (London Gateway, Thames), including instrument deployment, data acquisition, field supervision, and client liaison with environmental regulators. This background reinforces the environmental monitoring competencies applied in this assessment.

Prepared by: Matthias Leroy, MSc Marine and Lacustrine Sciences (University of Ghent) | May 2026

On behalf of: SEATEC NV | Verversrui 15, 2000 Antwerpen, Belgium | Application Reference: MUL230036