An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

January 7, 2026

licence@mara.gov.ie

RE: Maritime Usage Licence Application - Reference MUL250019

A Chara

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the Maritime Usage Licence application, by Helvick Head Offshore Wind Designated Activity Company, to undertake Marine environmental surveys for the purposes of site investigation which are required to characterise the physical, biological, and environmental conditions of Maritime Area A - Tonn Nua at South County Waterford.

Commercial sea fishing is a long-standing, pre-existing and traditional activity in the marine environment. The seafood sector, including fishing, processing, and associated support services, is the main source of employment in many rural and coastal areas.

BIM's Business of Seafood 2024 report outlines that over 16,800 jobs are reliant on the seafood sector on an overall basis. It is essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into the development of Offshore Renewable Energy (ORE) projects, to minimise adverse impacts on such employment and economic activity.

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

The MI has noted that geophysical and geotechnical survey methods, such as Sub-Bottom Profiling (SBP) and Ultra High Resolution Seismic (UHRS), pose potential risks to static gear fisheries due to the towed nature of survey equipment, which increases the likelihood of entanglement with buoy lines attached to strings of pots. Additionally, vibrations caused by geotechnical survey boreholes may lead to localised reductions in catch rates for brown crab and whelk during the survey period. Anthropogenic noise, including vibrations from drilling activities, can further disturb crustaceans and molluscs, exacerbating the impact on these fisheries.

The timing of the proposed surveys is important to minimising disruption to inshore fisheries. While the updated dataset provided in the BIM participatory mapping project has proven to be a valuable tool in enabling inshore fishers to provide spatial data on their activities, and for under 12 metre vessels operating from Waterford and Wexford ports has achieved a comprehensive sampling rate of 97%, it does not, however, currently provide seasonal usage of the site area. The Marine Institute has recommended that surveys be conducted in Q2 to reduce interactions with the brown crab fishery, as peak fishing opportunities are highly dependent on weather and

temperature conditions. Whelk fisheries, however, are likely to be affected regardless of the proposed survey time periods.

The proposed site investigation works for Maritime Area A – Tonn Nua, while essential for characterising the physical, biological, and environmental conditions to support ORE development, must be carefully planned and executed to mitigate potential impacts on inshore fisheries.

The MUL application area has a significant overlap with inshore fishing activities, as highlighted by the BIM participatory mapping project. This overlap is particularly pronounced for fisheries targeting brown crab and whelk, which are critical to the livelihoods of many inshore fishers. According to BIM's Business of Seafood 2024 report, landings of brown crab were valued at €20 million, while whelk landings were valued at €8 million, underscoring their economic importance at an overall level.

DAFM notes the "Compliance with Objectives of NMPF" document sets out that while survey vessels and equipment may create very localised, short-term restrictions, these will be minimal in extent and duration. It is also essential to consider the cumulative impact of survey activities, as prolonged periods of displacement could significantly affect fishing operations and earnings. While individual survey works may have limited potential for displacement, the cumulative effect of multiple surveys could result in extended disruptions to fishing activities in the Tonn Nua area.

To address the above concerns, it is recommended that the project team engage proactively with local fishing organisations and the Seafood/ORE Working Group to ensure effective communication and collaboration. The adoption of codes of best practice for fisheries engagement, as developed by the Seafood/ORE Working Group, will be instrumental in fostering positive relationships and minimising conflicts.

The appointment of a Fisheries Liaison Officer (FLO) is a welcome measure, as this role will facilitate coordination with local fishing interests, and should ensure timely dissemination of Notices to Mariners, and provide real-time communication during survey operations. Additionally, the deployment of guard vessels, where required, will safeguard operations and should mitigate other risks.

To conclude, the proposed site investigation works and their potential impacts on inshore fisheries, particularly brown crab and whelk, must be carefully managed. Measures, including the careful timing of surveys, proactive engagement with local fishing stakeholders, and adherence to codes of best practice for fisheries engagement, are essential to ensure that the socio-economic reliance on the seafood sector is fully recognised and protected in this area. By balancing the needs of inshore fisheries with the development of ORE, the project can contribute to sustainable marine resource management while supporting Ireland's renewable energy goals.

In addition, separately, further to the request from MARA, seeking additional information from Helvick Head Offshore Wind Designated Activity Company on 19 December 2025, the

Department would also appreciate sight of the requested information on "the proposed fisheries, fish and shellfish surveys (Section 2.4.4), the Further Environmental Surveys (Section 2.4.5) and the Noise Level Surveys (Section 2.5)."

Please also find attached documents, in Appendices I and II, 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

Appendix I - Marine Institute Report

Request for observations on application for Marine Usage Licence ref: MUL250019 – Helvick Head ORE – Tonn Nua Survey.

Matthew Coleman, Jonathan White – Marine Institute, 19/12/2025

Summary

The Marine Institute were contacted by DAFM in relation to a MARA application for a Marine Usage Licence (ref: MUL250019), for proposed marine site survey and site investigations within the South Waterford - Maritime Area A – Tonn Nua.

The request was for comments/observations on the impact this project might have on the whole of the seafood sector, with particular attention to timing of proposed surveys.

- Located in the South Waterford - Maritime Area A – Tonn Nua, **negative impacts could be expected on fishing activities principally inshore pot fisheries** (see BIM Participatory mapping for SC-DMAP**) caused by geophysical and geotechnical surveys. Resulting in displacement and loss of earnings for effected fisheries, with brown crab and whelk fisheries likely the most effected**.

- Degree and potential of displacement would be dependent on the geophysical and geotechnical survey methods. Several potential geophysical survey methods are highlighted (Sub-Bottom Profiling (SBP) / Ultra High Resolution Seismic (UHRS)) that **have potential entanglement risk to static gear**, due to the towed nature of the equipment. **Geotechnical survey boreholes methodologies could reduce catch rates of brown crab and whelk fisheries due vibrations caused by these activities**. Reduced catch rates however are likely only to occur during the survey period.

- The current **proposed geophysical and geotechnical survey times will likely overlap with peak fishing opportunities** with fisheries being highly weather and temperature dependant. Recommendations for timings of surveys to reduce interaction with brown crab fishery would be for surveys to occur in Q2. Whelk fisheries are likely to be equally affected in either of the proposed survey time periods.

- The application proposes that individual survey works would have limited potential displacement to fishing activity, **however cumulative survey work could see long periods of displacement for fishing gears in Tonn Nua**.

- Additional Recommendations would include engagement with the seafood/ORE Working Group and the adoption of codes of best practise for fisheries engagement produced by said group.

Background

Proposed scope of work and forecast time frames:

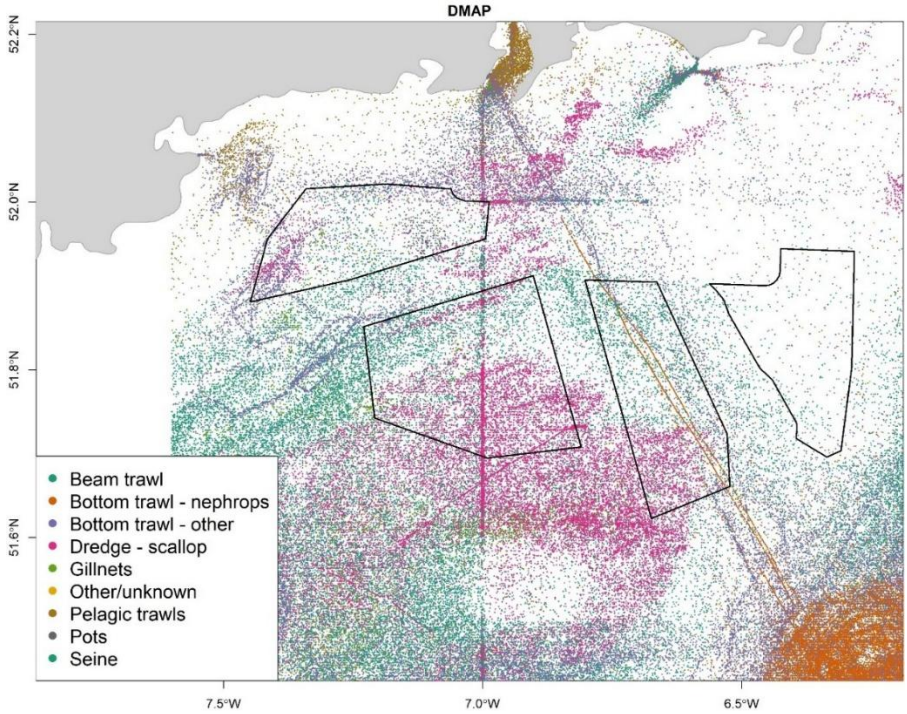
Scope of Work	Estimated Duration	Estimated Commencement Date
Geophysical Campaign	2 – 5 Months	Q2/Q3 2026 or 2027
Geotechnical Campaign	2 – 5 Months	Q2/Q3 2026 or 2027
Environmental/Ecological & Archaeological Surveys	Periodically across a 12-to-24-month Duration	2026 or 2027
Metocean Survey	Fixed 12-to-36-month period	2026, 2027 or 2028

Commercial Fisheries

Offshore (Vessels <12m)

Detailed VMS (vessel monitoring system) data is only available for vessels equal to and greater than 12m in length at an interval of 2 hours or less. This data can then be linked to Irish logbook data and the EU vessel register to determine the likely gear used.

The overall overlap and usage of Tonn Nua (Maritime Area A) by vessels of this size is lower than other adjacent sites in the SCDMAP and therefore the effect of survey activities could be seen as less impactful.



Raw VMS points (for the period 2018-22; vessels over 12m only). Each point corresponds to a VMS record of a vessel that was deemed to be fishing. Note that the fishing activity is not always correctly identified (a vessel may be steaming at speeds normally associated with fishing). Also note that a VMS transmission is 'triggered' when vessels cross the 7°W west line, leading to a higher density of points along this line than elsewhere.

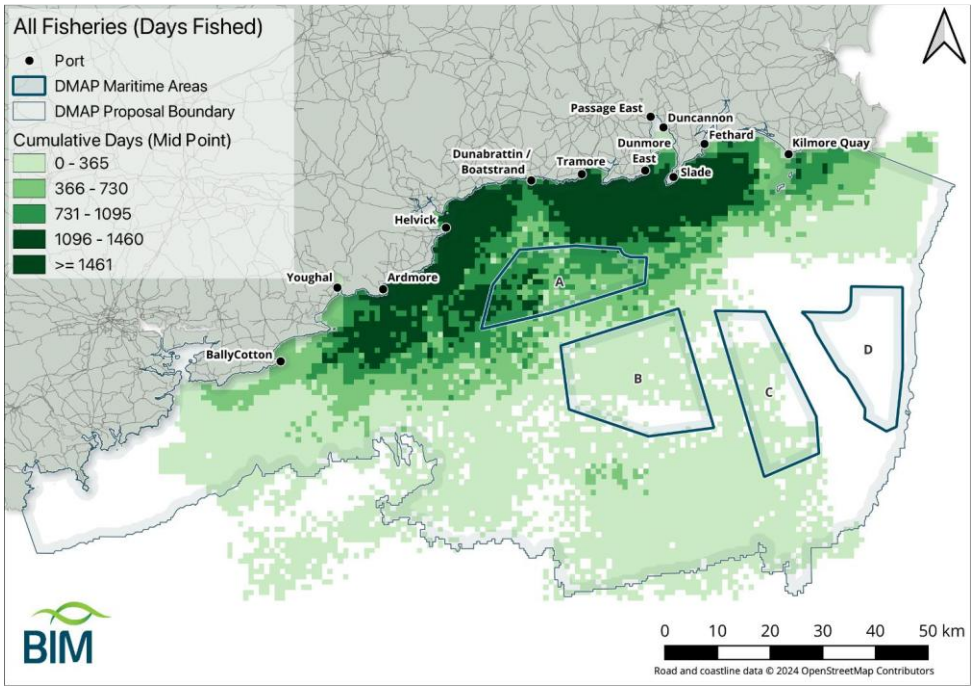
Inshore Fishing Vessels

Tonn Nua has a high degree of overlap with inshore fishing activity as highlighted by BIM participatory mapping.

Participatory mapping however does not provide seasonal usage of the site. In addition, owing to the current statutory data collection framework landing and gear types cannot be assigned beyond ICES rectangle level for these fisheries, with the Tonn Nua principally contained within ICES rectangle 32E2 (ICES rectangles are approximately 3,600km^2 in size).

Available habitat information indicated the most likely fisheries overlap would be those targeting brown crab and whelk. These static gear fisheries employ floating buoy lines attached to strings of pots, this method increases the potential for entanglement in towed survey equipment as proposed in the site investigation schedule of works.

Crustacean and mollusc can be disturbed by anthropogenic noise including vibrations caused by drilling activities. The resulting impact could be localised reduction in catch rates.



Results of BIM participatory mapping of inshore fishing vessels operating within the south coast DMAP area and overall overlap with designated areas for lease

Aquaculture

Owing to the offshore nature of proposed works no impact on commercial aquaculture is foreseen.

Appendix II - BIM 2025 Participatory Mapping Report

Updated spatial data on under 12 m fishing vessel activities for marine spatial planning off the south coast of Ireland

Elizabeth Tray and Ronán Cosgrove

BIM, New Docks, Galway, Ireland

Email: Elizabeth.Tray@bim.ie

Marine Spatial Planning Report **December 2025**

BIM

Key Findings

- Building on 78 vessels surveyed in 2024, BIM surveyed a further 59 vessels in 2025 providing a total of 137 vessels surveyed off the south coast.

Waterford and Wexford

- In addition to 70 surveys conducted in 2024, BIM surveyed an additional 15 vessels from Waterford and Wexford ports in 2025.
- BIM surveyed a total of 85 out of 88 active under 12 m vessels providing an overall sampling rate of 97%.
- The resulting aggregated data are comprehensive and suitable for marine spatial planning purposes.
- The updated aggregated spatial data for these vessels are available at this link.
- The data collected from Waterford and Wexford vessels are suitable for planning of the ORE maritime areas.
- The data can also inform planning of proposed Waterford or Wexford landfall zones of offshore transmission cables from Tonn Nua.

Cork

- BIM surveyed an additional four vessels from East Cork ports. It was not possible, however, to ascertain the sampling rate so these data were removed from finalised maps and datasets to avoid potential misinterpretation and use of incomplete datasets for planning purposes.
- BIM surveyed 40 vessels in other Cork ports but lack of local consensus on survey participation and resource constraints precluded further progress.
- The aggregated data from Cork vessels are not comprehensive and are not suitable for planning of proposed offshore transmission cable landfall points in East Cork or other planning purposes.
- BIM can make individual's data available to them as required.

Recommendations

- The BIM participatory mapping approach may be of benefit in enabling inshore fishers provide spatial data on their activities in relation to planning of other ORE developments and MPAs under the new National DMAPs.
- Lessons learned to date suggest that a strong level of regional consensus, coordination and implementation, underpinned by appropriate resource planning and allocation would be needed to ensure successful application of this approach in other Irish coastal areas.

Introduction

In 2024, BIM developed a participatory mapping tool to enable under 12 m vessels provide spatial data on their fishing activities for marine spatial planning (MSP) purposes (Tray et al., 2025) (link here). The project successfully generated data on < 12 m fishing activities in and around the four designated maritime areas for offshore renewable energy (ORE) off the south coast (Government of Ireland, 2024). The project results were presented at the Seafood-ORE Working Group and received positive feedback from the fishing and wind energy industries.

It is essential that any data on fishing activities used for these purposes are comprehensive to ensure inclusion of the relevant stakeholders and effective MSP. In 2024, BIM surveyed 70 out of 96 active fishing vessels operating from Waterford and Wexford ports providing a 73% sampling rate. Many of the outstanding 26 vessel owners were not available during survey work in 2024 and it was important to provide them with further opportunity to participate.

We also surveyed a further 11 vessels from the east Cork ports of Ballycotton and Youghal in 2024. The total number or active vessels was not available and it was not possible to estimate the sampling rate from these ports. East Cork is a key area for ORE development given that Eirgrid has identified a landfall zone where offshore transmission cables will come ashore from maritime area A – the other landfall location will be in Waterford or Wexford. Hence it was important to try and increase the sampling rate for vessels operating in east Cork. Data on under 12 m vessel activities are also needed for the rest of Cork to address data gaps in relation to development of Marine Protected Areas (MPAs) in the Celtic Sea (Marine Protected Area Advisory Group, 2024; Tray et al., 2025).

The objectives of the current study were as follows:

1. Update the spray-map application for improved functionality & data collection
2. Review active vessels and survey remaining vessels from Waterford and Wexford ports
3. Provide updated maps, spatial data and fisheries information restricted to Waterford and Wexford where comprehensive sampling was achieved
4. Identify active vessels and continue surveying remaining vessels from Cork ports
5. Provide recommendations on potential future work

Methods

We updated the spray-map application in collaboration with the developer, Professor Jonny Huck from Lune Geographic Ltd. BIM regional officers based in Wexford and Cork identified active vessels and those which had not yet been surveyed and arranged interviews with skippers. Prior to commencing further surveys in Cork, we met with the South West Regional Inshore Fisheries Forum which provided support for the project. BIM conducted the interviews mainly between June and August 2025. Detailed methodology on all aspects of this work is available in Tray et al. 2025 (link here). We restricted resulting fisheries outputs to Waterford and Wexford where comprehensive sampling was achieved. Incomplete spatial data were removed or excluded to avoid misinterpretation and use of incomplete data sets in MSP.

Results

Application Development & Improvements

We made minor improvements to the application and updated the user interface to improve overall mapping accuracy. We added a measure function, which enabled the interviewer to draw a line between two points on the admiralty chart using the mouse, automatically calculating the distance in miles. We also developed an “add more maps” option, which enabled interviewers to return to the mapping page if the survey was accidentally closed before completion. Additional laptop batteries were procured to enable extended sampling periods.

Updated outputs for Waterford & Wexford

The BIM regional officers identified 88 active vessels operating from Wexford and Waterford ports in 2025. This number was revised down from 96 in 2024 due to some vessels operating in other counties or becoming inactive. We surveyed an additional 15 vessels in 2025. This resulted in a total or 85 out of 88 active vessels surveyed providing a sampling rate of 97%. 82 skippers operated the 85 vessels. Updates to the maps and tables produced in Tray et al. (2025) are outlined below and the associated spatial data is available at this link. We excluded survey results from vessels operating from Cork ports due to lack of comprehensive data.

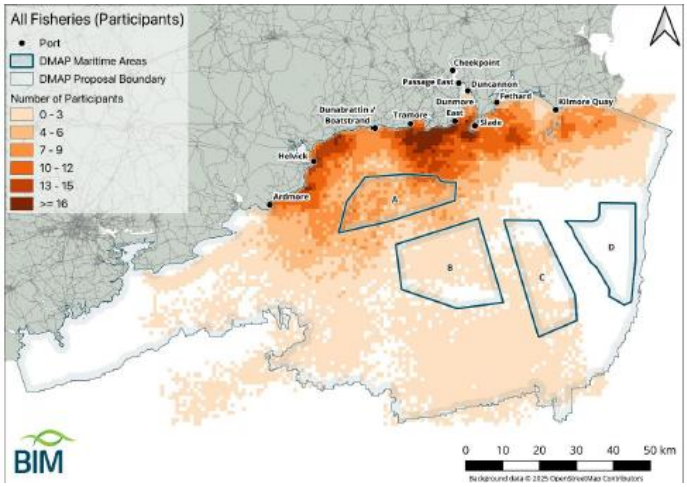


Figure 1. Updated map of combined fisheries by survey participants based in Waterford and Wexford ports in relation to ORE maritime areas

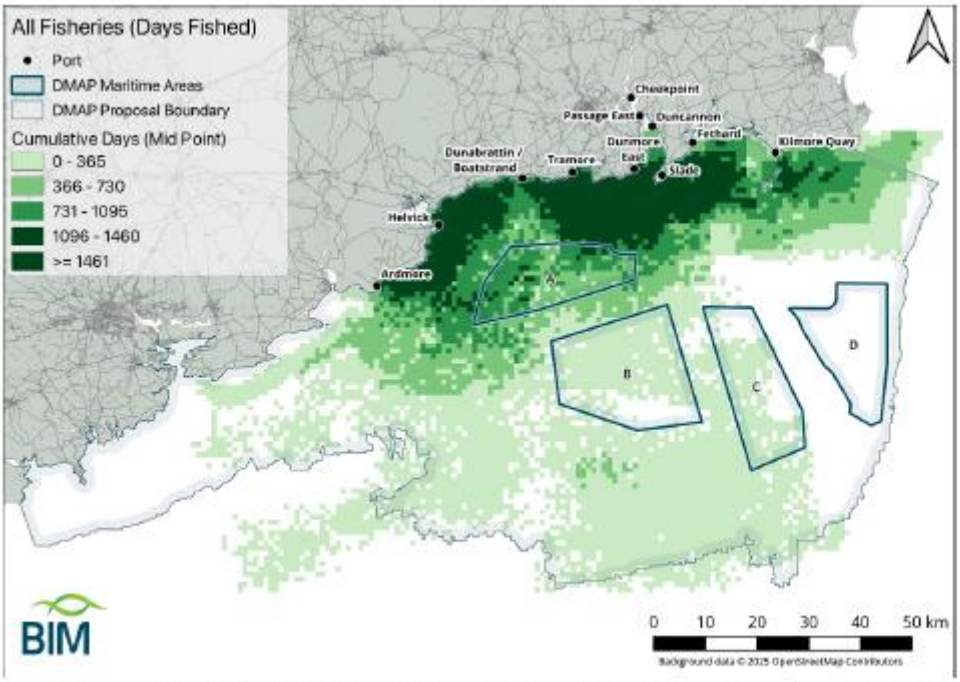


Figure 2. Updated map of combined fisheries by days fished for survey participants based in Waterford and Wexford ports in relation to ORE maritime areas

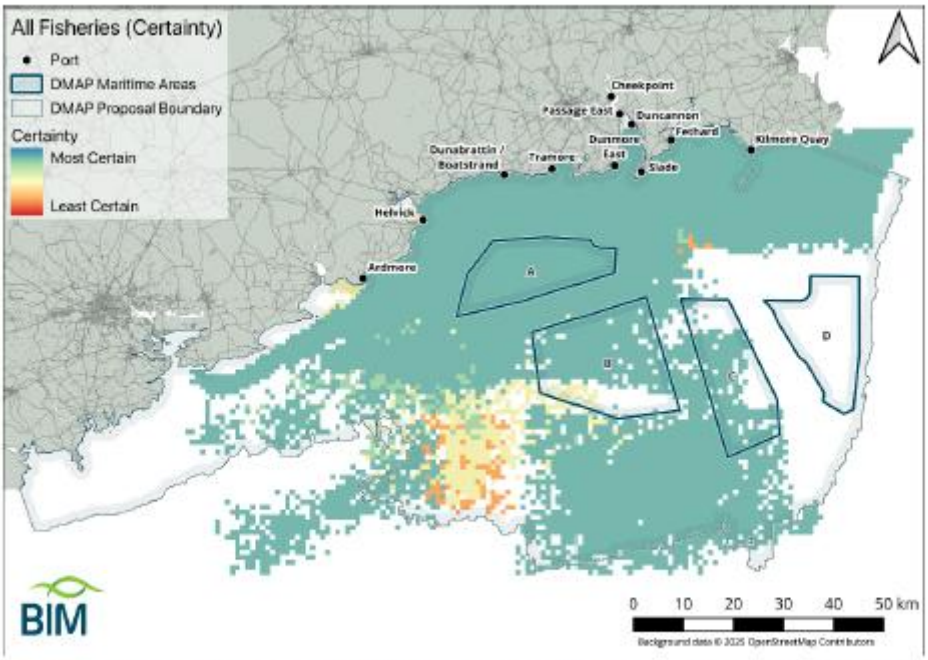


Figure 2. Updated map of statistical certainty for survey participants based in Waterford and Wexford ports in relation to ORE maritime areas

Table 1. Defined fisheries based on gear types and species

Fishery	Gear type	Species
Brown crab	pots	brown crab
Demersal trawl	single	haddock
		monkfish
		nephrops
		plaice
	twin-rig	nephrops
		plaice
Dredge	dredges	surf clam
Gillnets	gill nets	black pollack
		hake
		plaice
		pollack
		turbot
Hook & line	hook & line	mackerel
		pollack
Lobster	pots	lobster
Mid-water trawl	single	sprat
Other crab	pots	green crab
		spider crab
		velvet crab
Shrimp	pots	shrimp
Tangle nets	tangle nets	crayfish
		monkfish
		plaice
		spider crab
		turbot
Whelk	pots	whelk

Table 2. Vessel plotter and validation data

Characteristic	N	STDEV
Vessels with plotter (N)	57	
Vessels without plotter (N)	28	
Mean vessel size (m)	8.3	2.0
Mean vessel size with plotter (m)	9.3	1.6
Mean vessel size without plotter (m)	6.4	1.3
Fishing activities	234	
Validated fishing activities (N)	145	
Validated fishing activities (%)	62	
Mean validation score (%)	83	18.1

Table 3. Days fished in ORE maritime areas

Fishery	Total	A	B	C	D
Lobster	8550	275	0	0	0
Brown Crab	5625	1675	500	350	0
Shrimp	3000	0	0	0	0
Demersal Trawl	1225	1125	125	125	0
Whelk	1025	50	0	0	0
Other Crab	775	0	0	0	0
Gill Nets	600	175	225	100	0
Tangle Nets	600	50	25	0	0
Hook & Line	575	0	0	0	0
Mid Water Trawl	150	0	0	0	0
Dredge	125	0	0	0	0
Total	22250	3350	875	575	0

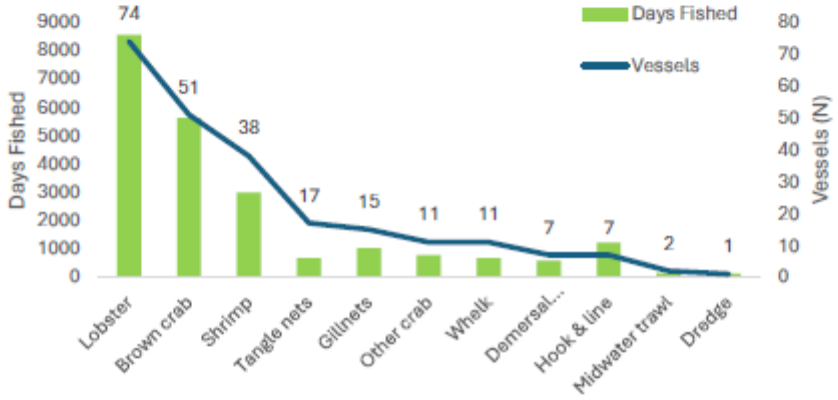


Figure 4. Cumulative days fished and number of vessels in each defined fishery

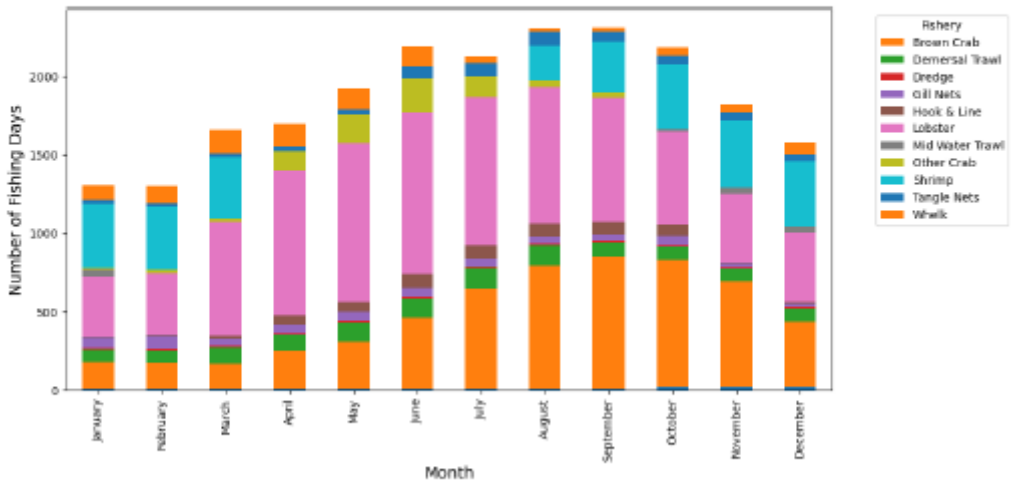


Figure 5. Number of fishing days for each fishery by month

Figure 6. Heat map of fisheries by month standardised by fishery

Surveys of vessels from Cork ports

There were over 300 vessels registered to Cork addresses in the 2025 fleet register, and many of these vessels could not be categorised as active or inactive nor could their home ports be identified. Hence, it was not possible to derive related sampling rates and no detailed outputs were provided for vessels from Cork ports due to lack of comprehensive data.

The Cork ports are widely dispersed over a large area. This raised logistical and resource issues and it was difficult for available BIM staff to make substantial progress on surveying vessels over such a wide area.

We did complete surveys for 44 vessels from Cork ports. Four of these came from the East Cork ports of Ballycotton, Youghal, and Knockadoon resulting in a total of 15 vessels surveyed from the area over two years.

We surveyed a further 40 active vessels across 10 more Cork ports further to the west. Concerns were raised by participants in some of these ports over potential use of the data for area-based fisheries management measures under Natura 2000. It was not possible for the project team to provide assurance that the resulting aggregated data would not be used for these purposes and we decided to cease surveys in these areas due to lack of local consensus around participation.

Discussion

Building on 78 vessels surveyed in 2024, BIM surveyed a further 59 vessels in 2025 providing a total of 137 vessels surveyed off the south. This study has enabled skippers of under 12 m vessel in Waterford and Wexford ports to provide comprehensive spatial data on their fishing activities in relation to designated ORE maritime areas. We improved the sampling rate from 73% in 2024 to 97% in 2025 and gathered data for all skippers who were willing to participate. The updated aggregated spatial data for these vessels are available at this link.

It is essential that aggregated data generated using this approach have a high sampling rate and are as comprehensive as possible to avoid exclusion of key stakeholders from MSP. We are satisfied that the data from Waterford and Wexford vessels meet this requirement.

Building on work in 2024, we surveyed additional vessels in East Cork ports in 2025. However, the number of active vessels operating from these ports could not be ascertained so we could not derive a sampling rate or tell if the data were comprehensive. Hence, data from East Cork vessels were removed from outputs to avoid potential misinterpretation and use of incomplete datasets for planning purposes.

We also surveyed vessels operating from Cork ports further to the west but resource constraints and a lack of local consensus on survey participation precluded further progress. It is important to note that the data provided by vessels from Cork have been retained and individual's data can be made available to them as required. Subject to local needs and consensus, a regionally coordinated data collection programme would need to be implemented in Cork before aggregated fleet-level data could be made available for MSP purposes.

The data collected from Waterford and Wexford vessels are suitable for planning of the ORE maritime areas, particularly maritime area A 'Tonn Nua' which is first up for proposed development post 2030. The data can also inform planning of proposed Waterford or Wexford landfall zones of offshore transmission cables from Tonn Nua. However, our published data are not suitable for planning of proposed landfall points in East Cork.

Our developed participatory mapping approach may be of benefit in enabling inshore fishers provide spatial data on their activities in relation to planning of other ORE developments and MPAs under the new National DMAPs. Lessons learned to date suggest that a strong level of regional consensus, coordination and implementation, underpinned by appropriate resource

planning and allocation would be needed to ensure successful application of this approach in other Irish coastal areas.

Acknowledgements

Thanks to all the skippers who participated in the study. Thanks to BIM regional officers John Hickey and Sean Daly for their assistance and to Jonny Huck for work on the application development and map outputs. Thanks to the BIM IT Team Janet, Steven, and Terri for their ongoing collaboration. This work was funded by the Irish Government and part-financed by the European Union through the EMFAF Operational Programme 2021 – 2027.

Data Citation

Bord Iascaigh Mhara. (2025). Updated spatial data on under 12 m fishing vessel activities for marine spatial planning off the south coast of Ireland (Version 2) [Data set]. Zenodo. https://doi.org/10.5281/zenodo.17979611 ,

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