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RE: MUL250024 - surveys to inform the Port of Cork expansion project

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on Port of Cork's application to undertake surveys to inform the Port of Cork expansion project.

It is essential that the sea-fishing and aquaculture sectors are fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment as the proposed surveys are being evaluated.

Fishers and aquaculture site holders are primary food producers dependent upon certain marine areas which are particularly important for food production. This primary production is critical to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities. The importance of these primary and secondary food production activities is reflected in the Government's Food Vision 2030 policy.

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

It is believed by DAFM's agencies that the works involved in the proposed site investigation surveys should not interfere with fishing activities due to their short nature and the small area of the proposed operations, as well as the distance to aquaculture areas. A variety of fishing activities, including pot fishing, takes place adjacent to the area of interest outlined in licence application MUL 250024 (Source: Ireland's Marine Atlas).

Timely notification to aquaculture producers and fishers on the ground, through direct contact using the Irish Fleet Register ([Sea-Fishing Boat Licence Applications, Forms and Conditions](#)) should be taken. This will allow them to make informed food safety decisions around timing of shellfish harvesting and fishing activity during the scheduled proposed activities. Cumulative impacts should be given consideration with regard to similar activities proposed/planned to take place in close spatial and temporal proximity to the site.

DAFM recognises that the developer's aim is to promote co-existence and minimise potential disruption to commercial fishing activities in the area. The evaluation of potential impacts of the surveys on commercial sea fishing activities needs to be given consideration within the context of the requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework. (NMPF). The principles in the NMPF of avoiding, minimising, or mitigating impacts on access to existing activities (including specific policies on Fisheries and

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Department of Agriculture,  
Food and the Marine



Aquaculture) should be followed and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas.

Please also find attached documents from the MI, BIM and SFPA which provide further comments for consideration.

Yours sincerely,

**Marine Divisions**  
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*Department of Agriculture, Food and the Marine*