

MAC Report	
Application for a Maritime Area Consent (MAC) under Section 79 of Maritime Area Planning Act 2021, as amended (the Act)	
Application Details	
MAC Applicant:	Amazon MCS Ireland Limited
MAC Reference No:	MAC250018
Location:	Owenahincha, Co. Cork
Date Application received:	09 December 2025
Proposed Maritime Usage:	Amazon MCS Ireland Limited has applied for a MAC for the installation, operation, monitoring, maintenance, repair and decommissioning of a subsea fibre optic cable system.
Recommendation:	To approve the Granting of the MAC sought with conditions attached.

Document Control			
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1. Overview

On 09 December 2025, MARA received a Maritime Area Consent (MAC) application under Section 79 of the Maritime Area Planning Act 2021, as amended (the Act) from Amazon MCS Ireland Limited (the Applicant) for proposed works relating to the installation, operation, monitoring, maintenance, repair and decommissioning of a subsea fibre optic cable system (named the Fastnet Cable System) between Owenahinch, Co. Cork and Ireland's outer maritime area boundary. The fibre optic cable is planned to cross the Atlantic Ocean and connect with Maryland on the east coast of the United States of America (USA).

2. Background

The Applicant has stated that the purpose of the Fastnet Cable System is *"to provide next generation, high capacity, scalable, diverse and secure connectivity between Ireland and the USA"*. The Applicant states that the entire length of the cable between Ireland and USA is approximately 6,300km, of which approximately 600km relates to the MAC area sought.

Based on the information supplied by the Applicant, this project is considered to fall under Schedule 10 of the MAP Act. Schedule 10, Part 5 of the MAP Act prescribes *"Development consisting of the laying of a telecommunications cable or pipeline of not less than 15 kilometres in length"* as a class of development specified for inclusion in the Eighth Schedule of the Planning and Development Act as amended, therefore the Applicant is required to apply for development consent from An Coimisiún Pleanála for this project. The Applicant states that they will also acquire relevant consents/licences (e.g. Road Opening Licences) from Cork County Council for the onshore (landward of the High-Water Mark (HWM) as mapped by the Chief Boundary Surveyor¹) elements of the proposed development.

3. Proposed Maritime Usage

The proposed subsea cable will be 37mm in diameter and will connect to a terrestrial cable onshore in Owenahinch, Co. Cork. The subsea cable will terminate and transition to terrestrial cables in a Beach Manhole (BMH) which is proposed to be on the landward side of the High-Water Mark on the beach at Owenahinch. The Applicant states that the cable laying works will be carried out by a specialist marine installation contractor. The cable is proposed to be buried between the BMH and shallow water by trenching or jetting. Beyond the surf zone, the cable will be buried by a cable lay vessel using a marine cable plough in water depths between 0-1500m. The cable will be laid directly on the seabed in deeper waters (>1500m) where bottom fishing and anchoring are unlikely to impact on the cable route.

The Applicant states that the general cable installation processes involves:

1. Pre-Lay Grapnel Run (PLGR): This occurs immediately prior to installation of the subsea cable and the Applicant states that the purpose is to *"clear seafloor surface debris (e.g., wires or hawsers, derelict fishing gear, etc.) that may have been deposited along the route to prevent plough fouling. Any debris recovered during these operations shall be disposed ashore in accordance with local legislation upon*

¹ [Tailte Eireann - High Water Mark - Ungeneralised 2026 version](#)

completion of the operations". PLGR is carried out in water depths between 0m and 1500m, and the Applicant states that it is not conducted in locations where there are known existing buried subsea cables.

2. Cable Landing: The cable is winched/pulled from the cable laying vessel onto shore where it is anchored in the Beach Manhole (BMH). The cable is then protected using cast iron articulated pipe and the trench is prepared between the BMH and Low Water Mark. The cable is placed in the trench, and the trench is backfilled to bury the cable.
3. Post Lay Inspection and Burial: The subsea cable is buried between the Low Water Mark and 20m water depth by backfilling the trench. The installation will be inspected during and after the works.
4. Main Cable Laying: Once the cable is secured at the landward end, the cable laying vessel lays the subsea cable. In water depths up to 1500m, a sea plough is used to simultaneously lay and bury the cable in the seabed. The natural movement of sediment on the seabed backfills the trench. The speed of this operation is typically less than 1 knot. In water depths exceeding 1500m, the cable is laid on the seabed surface and is not buried by mechanical means, however it may self-bury itself depending on natural seabed conditions.
5. Post Lay Inspection and Burial: Inspections may be carried out post lay to inspect the cable and ensure proper laying along the cable route.

The Applicant states that cable laying operations in the maritime area will be continuous, i.e. 24 hours a day. The Applicant has submitted "*Public Consultation Report March-October 2025*" which outlines the public consultation that has been carried out in advance of this MAC application. The report notes the specific audiences that were targeted which include political stakeholders, civic / community groups, near neighbours and recreational water users. As the proposed cable transitions from maritime area to terrestrial land at the beach at Owenahincha, public access/use and amenity of the proposed MAC area will be restricted during the construction phase of the works to be carried out in the Maritime Area.

The length of the cable proposed within Ireland's territorial waters and Exclusive Economic Zone (EEZ) is 598.122km, comprising 35.575km within Ireland's territorial waters, and 562.547km within Ireland's EEZ (outside of territorial waters). The applicant has sought a MAC area of 3,861.06km². The Applicant requested that the width of MAC corridor increases as the water depth increases as per Table 1 below. The increase in MAC corridor width is requested to allow for future repairs to the subsea cable, which may require a loop of cable to be trenched/ placed on the seabed. This loop of cable is called a Bight offset, which the Applicant states can create a loop of up to twice the water depth to either side of the original cable location should this type of repair be required.

Table 1: MAC corridor widths requested

Water Depth	Total Corridor Width for Installation and Repair
0-100m	400m
101-250m	1000m
251-500m	2000m
501-1000m	4000m
1001-1500m	6000m
1501-2500m	10000m
2501-5000m	10000m

The Applicant has requested a MAC term of 30 years. The Applicant states that the design life of the cable will be 25 years, and that the requested term will cover the “*planning, construction, operation and decommissioning of the system... with 2 years for planning and construction, 25 years operational life and 3 years to decommission the system and rehabilitate the maritime area*”. The Applicant states that the design and performance of the cable will conform to standards recommended by the International Telecommunication Union - Telecommunication Standardization Sector (ITU-T), European Telecommunications Standards Institute (ETSI) and the International Electrotechnical Commission (IEC) as applicable.

The MAC area sought by the applicant is illustrated in Figure 1.

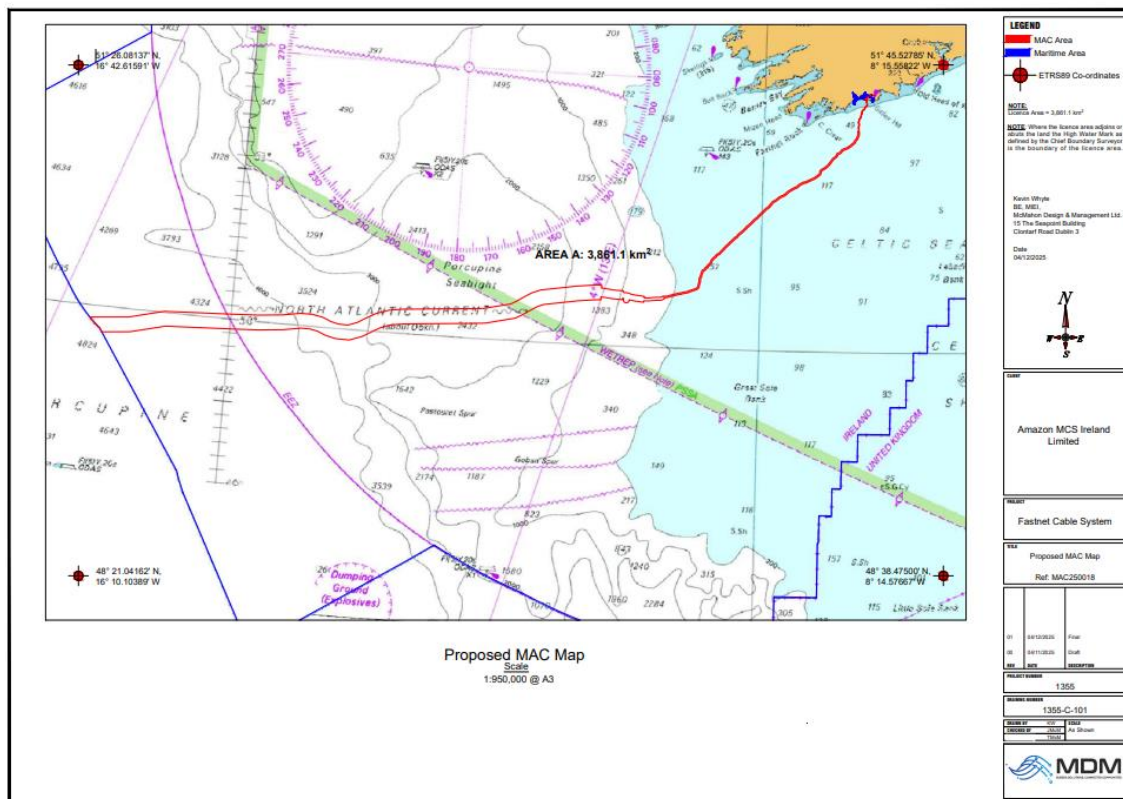


Figure 1: Applicant map of proposed layout of MAC area for Fastnet Cable System

4. Site Visit

Richard Browne, Chartered Engineer and Director at McCarthy Browne visited the site on behalf of MARA on 16 March 2026.

The foreshore landing site for the proposed cable was easily accessible on foot via steps from a public car park located off the R598. The site is a wide shallow sandy strand with rock outcrops at either end of the strand and sand dunes to the rear. The presence of a lifeguard station was noted to the west of the proposed works site.

No other existing infrastructure or occupation, which would materially conflict with the proposed maritime usage, was noted during the site inspection.

Photographs 1 to 4 document the character of the receiving maritime environment within the immediate vicinity of the proposed MAC area in the foreshore area.



Photograph 1: View east at approximate landing point [RB 16/03/2026]



Photograph 2: View showing access to east from carpark being worked on [RB 16/03/2026]



Photograph 3: View north from approximate landing point [RB 16/03/2026]



Photograph 4: View west from access point on top of dunes [RB 16/03/2026]

5. Review of Legislation & Associated Consents

5.1 Applicable Provisions of the Maritime Area Planning Act, 2021 as amended (the Act)

Under the Act, MARA has responsibility for granting MACs. Schedule 3 and Schedule 4 of the Act specifies maritime usages for which a MAC is not required, including where the proposed maritime usage falls under the remit of another enactment, is navigation or fishing, is a licensable activity under Schedule 7 or where the activity is to be undertaken on private land. The proposed maritime usage is not considered to fall under those listed under Schedule 3 or 4 of the Act.

The applicant has stated that the proposed maritime usage and the subject of this application requires development permission. In accordance with Section 75(1) of the Act, a MAC is required before an application for development permission can be lodged with the relevant consent authority.

Accordingly, the subject of this application is considered to fall under Section 75(1) of the Act.

5.2 Ownership

A search was undertaken of the Land Registry on 15 December 2025 and 18 June 2026 for any document granting or affecting rights to land to ensure that there are no conflicts of interest with the MAC area being applied for as outlined in the proposed MAC Map.

No conflicts of interest affecting the proposed MAC area were identified.

5.3 Existing Consents & Authorisations

A search of the MARA's GIS database was undertaken on 15 December 2025 and 18 June 2026 for spatial overlap between the proposed MAC areas and existing foreshore authorisations and MARA licences and consents.

The proposed MAC area does not overlap with any MACs or existing Foreshore Act consents. The application overlaps with four Maritime Usage Licences (MUL) as detailed in *Table 2* below.

Table 2: Summary of Overlapping maritime authorisations and foreshore authorisations				
File Reference Number	Applicant/ Holder	Consent Type	Maritime Usage	Status
MUL230015	Uisce Éireann	MUL	Strategic modelling study of water currents and bathymetry	Licensed
MUL230024MA	Deep Sea Fibre Networks Ltd.	MUL	Marine survey and site investigations for a cable route for the PISCES subsea telecoms cable system	Licensed
MUL230031	Amazon MCS Ireland Ltd	MUL	Geophysical survey and site investigations	Licensed
MUL250021	National Oceanography Centre	MUL	Marine research surveys	Licensed

Maritime Usage Licence MUL230015, granted by MARA, authorises Uisce Éireann to undertake a strategic modelling study of water currents and bathymetry surveys in the proposed MUL area along the south Cork coastline in Glandore Bay. As Maritime Usage Licences are issued on a non-exclusive basis and this licence

relates to survey activities, co-existence with the proposed maritime usage the subject of this application is considered possible, therefore no conflict is considered to exist.

Maritime Usage Licence MUL230024MA, granted by MARA, is a Material Amendment to previously granted MUL230024. This MUL authorises Deep Sea Fibre Networks Ltd., to undertake marine surveys and site investigations within the licence area. The permitted MUL area is the proposed cable route for the PISCES subsea telecoms cable system. The MUL area crosses the proposed MAC area to the southwest of Ireland in the EEZ. As Maritime Usage Licences are issued on a non-exclusive basis and this licence relates to site investigation activities, co-existence with the proposed maritime usage the subject of this application is considered possible, therefore no conflict is considered to exist.

Maritime Usage Licence MUL230031, granted by MARA, authorises Amazon MCS Ireland Ltd., to undertake geophysical surveys and site investigations within the licence area for a proposed transatlantic subsea fibre optic cable, which is the subject of this MAC application. As Maritime Usage Licences are issued on a non-exclusive basis and this licence relates to site investigation activities for the subject development of this MAC application, co-existence with the proposed maritime usage the subject of this application is considered possible, therefore no conflict is considered to exist.

Maritime Usage Licence MUL250021, granted by MARA, authorises National Oceanography Centre to conduct systematic scientific surveys for the characterisation of the transport of natural particles, nutrients, organic carbon and pollutants from the continental shelf to the deep-sea. As Maritime Usage Licences are issued on a non-exclusive basis and this licence relates to survey activities, co-existence with the proposed maritime usage the subject of this application is considered possible, therefore no conflict is considered to exist.

The Marine Institute's Ireland's Marine Atlas database² was searched on 15 December 2025 and 18 June 2026 for spatial overlap between the proposed MAC areas and any Department of Agriculture, Food and the Marine (DAFM) foreshore authorisations for aquaculture sites. No overlaps with any DAFM foreshore authorisations for aquaculture sites were found.

In summary, no existing MACs, MULs, foreshore authorisations (including those for aquaculture) or applications for the same were identified as overlapping the proposed MAC application area which would impede MARA in granting a MAC for the proposed maritime usage.

5.4 Development Permission

The Applicant has stated that the proposed works require development permission. The applicant indicated that they intend to apply for development permission should they be successful in obtaining a MAC for the proposed project. No application for development permission has been made in advance of seeking a MAC from MARA.

Owing to the nature and scale of the proposed works, it is considered reasonable that the MAC Holder (if successful in obtaining a MAC) should submit a valid application for development consent to the relevant planning authority within 18 months of issuance of a MAC.

² <https://atlas.marine.ie/>

The applicant in their development permission application to the relevant planning authority is required to include a Rehabilitation Schedule detailing how the applicant proposes to rehabilitate the maritime area in accordance with Part 4, Chapter 8 of the Act.

6. Assessment

6.1 Schedule 5

The MAC application was submitted on 09 December 2025 with the appropriate fee paid on 09 December 2025 and reviewed for completeness on 11 December 2025. The application was deemed complete by MARA on 11 December 2025.

A number of requests for additional information were issued on 13 January 2026; 19 March 2026; 21 April 2026; 07 May 2026; 26 May 2026 and 05 June 2026 under Section 79(3) of the Act and associated responses received relating to matters for general, technical and financial assessment on 29 January 2026; 24 March 2026; 27 April 2026; 13 May 2026; 29 May 2026 and 13 July 2026.

Schedule 5 of the Act sets out the criteria to which MARA must have regard when assessing a MAC application. This report sets out the assessment undertaken pursuant to Section 5 of the Act. The assessment is summarised in *Table 2* below.

Table 3: Synopsis of the assessment of the application with regard to the requirements of Schedule 5			
Schedule 5 Requirements		Synopsis	Assessment
1.	The nature, scope and duration of the occupation of the maritime area concerned for the purposes of the proposed maritime usage.	Details of the proposed maritime usage, including the nature, scope and duration are described in Section 3 & 4 above. The Applicant has stated that the proposed subsea cable will be designed with reference to the International Telecommunication Union - Telecommunication Standardization Sector (ITU-T), European Telecommunications Standards Institute (ETSI) and International Electrotechnical Commission (IEC) standards. Based on the application of these standards, it is considered that a design life for the subsea cable of circa 25 years, with proper maintenance and repair as required, should be achievable. Accordingly, a MAC term of 30 years as requested by the Applicant (allowing for planning, construction and decommissioning/rehabilitation phases) is recommended. The proposed maritime usage is considered satisfactory, having regard to the nature, scope and duration.	Satisfactory
2.	Whether the proposed maritime usage is in the public interest.	The Applicant states that the proposed project aligns with the following policies/programme of Irish Government; - <i>The National Development Plan 2021-2030</i> - <i>The Digital Connectivity Strategy for Ireland, 2022</i> - <i>Harnessing Digital – The Digital Ireland Framework (2022)</i> - <i>The National Digital Strategy and White Paper on Enterprise (2022 – 2030)</i> - <i>The Department of the Environment, Climate and Communications’ International Connectivity Consultation in 2024</i> On a European level, the Applicant states that the proposed project aligns with; - <i>The EU Digital Decade Policy Programme 2030 (Decision (EU) 2022/2481)</i> - <i>Trans-European Networks for Telecommunications (TEN-Telecom) policy framework</i> - <i>The European Commission’s digital transformation framework, 2030 Digital Compass: The European way for the Digital Decade</i> The Applicant confirms that the proposed maritime usage contributes to the sustainable economic development of the local area or wider economy and states <i>“The Fastnet Cable System project will provide skilled marine-related employment during its construction phase and will support the marine services supply chain. The operation and maintenance of the Fastnet Cable System will also require the services of skilled technicians and engineers over its lifetime.”</i> and <i>“Such infrastructure could be expected to attract further investment in the region.”</i> <i>“At a national level, the project strengthens Ireland’s role as a primary European gateway for transatlantic data flows, which directly supports the export-led digital economy. This aligns with Ireland’s Harnessing Digital</i>	Satisfactory

		strategy and White Paper on Enterprise, both of which emphasise high-value, knowledge-intensive sectors. Improved direct connectivity to the US boosts the performance and attractiveness of Ireland's cloud infrastructure ecosystem, enabling more efficient multi-region operations for global cloud providers and reducing dependence on third-country transit routes. That, in turn, supports Ireland's position in global value chains for digital services and data-intensive research collaborations. By encouraging distributed economic activity, the project supports Ireland's balanced regional development goals. It creates the enabling infrastructure for long-term, sustainable job creation in high-skill sectors, while also making regional areas more viable for digital businesses reliant on international connectivity." It is considered that access restrictions are likely to occur during the construction phase of the proposed works which may affect the public use of the beach. It is considered appropriate that the Applicant provides sufficient advance notification of any planned temporary restrictions or closures. It is recommended that a condition is included in the MAC requiring the holder to undertake public engagement in advance of undertaking the permitted maritime usage. Refer to Section 9 for further details The proposed maritime usage is considered satisfactory, having regard to the public interest.	
3.	The location and spatial extent of the occupation of the maritime area concerned for the purposes of the proposed maritime usage.	The total area occupied by the proposed MAC is 3,861.06km², as illustrated in Figure 2 (Proposed MAC Map) in Section 7. The total length of cable within the maritime area under MARA's jurisdiction is 598,122m. The length of cable between the HWM and 3 Nautical Mile (NM) nearshore limit is 8,244m (Section L1 of Figure 2– Proposed MAC Map). The length of cable between the 3NM limit and 12NM Territorial Sea limit is 27,331m (Section L2 of Figure 2 – Proposed MAC Map). The length of cable in the Outer Maritime Area (beyond the Territorial Sea 12NM limit) is 562,547m (Section L3 of Figure 2 – Proposed MAC Map). Details of the location, relevant consents, ownership and development permissions are provided in Sections 3 to 5 above. Based on the searches, nothing was identified that would preclude the granting of a MAC in the proposed area. Accordingly, the proposed maritime usage is considered satisfactory, having regard to the location(s) and spatial extent of the occupation.	Satisfactory

4.	Guidelines issued under Section 7 which are relevant to the proposed maritime usage.	No such guidelines have been published to date.	Not applicable
5.	Whether the applicant is a fit and proper person (within the meaning of Schedule 2) to be granted a MAC, both at the time the application is made and at the time that the MAC application concerned is determined by the MARA.	A detailed review and assessment of the information provided by the applicant(s) has been completed. Based on the assessment set out in Table 3 below, Section 6.3 and the Financial Capability Assessment (FCA) as set out in the Ernst & Young (EY) report dated 02 June 2026, it is considered that the applicant satisfies the fit and proper person requirements. As required by Schedule 6, Part 2 of the Act, it is a condition of all MACs that the Holder shall continue to be a fit and proper person within the meaning of Schedule 2 of the Act for the Term of the MAC.	Satisfactory
6.	Whether the applicant is tax compliant, both at the time the application is made and at the time that the MAC application concerned is determined by the MARA.	The applicant submitted Tax Registration Number and Tax Clearance Access Number (TCAN) which was used to view the applicant's tax clearance certificate. Based on the review of the tax clearance certificate, the applicant is considered tax compliant.	Satisfactory
7.	In the case of any maritime usage relating to offshore renewable energy (within the meaning of section 100), the consistency of the MAC application concerned with the development plans of the transmission system operator (within the meaning of section 100).	Not applicable	Not Applicable
8.	The National Marine Planning Framework (NMPF).	Based on a review of the application, MARA has had regard to the National Marine Planning Framework (NMPF) and it is considered that the proposed project aligns with the overall objectives of the NMPF, including the telecommunications, economic and social objectives set out therein.	Satisfactory

		It is considered that the proposed project aligns with the following economic, social and key sectoral policy objectives of the NMPF: - Co-existence Policy 1 - <i>Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate.</i> <i>If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference:</i> <i>a) minimise significant adverse impacts,</i> <i>b) mitigate significant adverse impacts, or</i> <i>c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.</i> Infrastructure Policy 1 - <i>Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.</i> Telecommunications Policy 1 - <i>Proposals that guarantee existing and future international telecommunications connectivity which is critically important to support the future needs of society, Government, the provision of Public Services and enterprise in Ireland, should be supported.</i> Telecommunications Policy 4 - <i>Proposals that ensure and enhance connectivity of Ireland's rural and island communities to high quality telecommunications networks should be supported.</i> In the application, the applicant states that the proposed project is consistent with the environmental objectives of the NMPF. The proposed works constitute development which require planning permission and environmental assessment of the proposed maritime usage, which is undertaken at development permission stage by the relevant planning authority. This above assessment does not prejudice any consideration and determination that the relevant Planning Authority may make in relation to the NMPF when considering the Planning Application for this development. Based on the above, MARA is satisfied that the proposed works align with the above overall objectives and policy objectives of the NMPF.	
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9.	The extent and nature of the preparatory work already undertaken by the applicant towards ensuring the efficacious undertaking of the proposed maritime usage the subject of the MAC application concerned should the applicant be granted a MAC in respect of such usage.	The Applicant states the following in relation to preparatory works: <i>“The preparatory activities for the Fastnet Cable System project began with comprehensive desktop and feasibility studies to establish technical, environmental, and permitting feasibility. These studies compiled and assessed existing data on bathymetry, seabed geology, metocean conditions, environmental designations, existing infrastructure, and coastal landfall options, in line with International Cable Protection Committee (ICPC) recommendations. They identified key constraints, stakeholder interests, and regulatory requirements leading to preliminary route engineering and the selection of a cable route corridor. An application for a maritime usage licence (MUL240030) was submitted to conduct geophysical and geotechnical surveys within this corridor.</i> <i>Following receipt of the MUL in April 2025, detailed marine and land-based surveys have been completed to investigate seabed and onshore conditions along the route. These include marine geophysical and geotechnical surveys (multibeam, side-scan sonar, sub-bottom profiling, CPTs, grab samples, gravity cores), landfall topographical surveys, bar probes, environmental and archaeological studies, and landfall investigations to inform burial assessments, Horizontal Directional Drill or trench design, and engineering parameters. Environmental, ecological, archaeological, and socio-economic data have also been collected to support appropriate assessments and the planning application.”</i> Having regard to the above, the extent of the preparatory works undertaken are considered acceptable for a project of this scale and nature.	Satisfactory
10.	The extent and nature of stakeholder engagement undertaken by the applicant in respect of the proposed maritime usage.	The Applicant stated in their application that the <i>“Fastnet Consultation Report and Fastnet Fisheries Liaison Report”</i> outlines <i>“the engagement that has taken place with marine users in the area.”</i> The document titled <i>“FASNET Consultation Report MAC250018”</i> outlines the stakeholder engagement undertaken with Elected Representatives, Civic / Community Groups, Near Neighbours, Recreational Water Users and Wider Audience. The document <i>“FASTNET Fisheries Liaison Report MAC250018”</i> outlines the stakeholder engagement with the local fishing community. Having regard to the above, the extent and nature of the stakeholder engagement undertaken is therefore considered acceptable for a project of this scale and nature.	Satisfactory
11.	Where a competitive process referred to in section 93 or 103 is used, the outcome of such process.	Not applicable	Not applicable

12.	Any additional criteria specified, for the purposes of this paragraph, in regulations made under section 80(2).	No such regulations have been made to date.	Not applicable
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6.2 Fit & Proper Person Assessment

Schedule 2(2) of the Act sets out the criteria to which MARA shall have regard in determining whether the relevant person(s) is/are “fit and proper” to be granted and to hold a MAC. The assessment of whether the holder is a fit and proper person within the meaning of Schedule 2(2) is set out in *Table 3* below.

Table 4: Schedule 2(2) Fit & Proper Person			
Fit & Proper area for assessment		Synopsis	Assessment
(a)	letters of reference;	As set out in Section (g) below, the Applicant has demonstrated clear evidence of their expertise and technical capability in successfully delivering projects of a similar scale. No letters of reference were provided.	Satisfactory
(b)	that the relevant person, or any other person concerned, stands convicted of— (i) an indictable offence under this Act or an offence in another state equivalent to an indictable offence, (ii) an indictable offence under an enactment prescribed for the purposes of this clause, or (iii) an offence involving fraud or dishonesty;	As part of the FCA, the Applicant and their Supporting Entity, Amazon.com Inc., were assessed against these criteria and it was concluded that no information or details were identified which indicate that such offences or disqualifications apply.	Satisfactory
(c)	if the relevant person is a body corporate, whether any of its directors has a declaration under section 819 of the Act of 2014 made against him or her or is	As part of the FCA, the Applicant and their Supporting Entity, Amazon.com Inc., were assessed against these criteria and it was concluded that no information or details were identified which indicate that such offences or disqualifications apply.	Satisfactory

	deemed to be subject to such a declaration by virtue of Chapter 5 of Part 14 of that Act, or is subject to or deemed to be subject to— (i) a disqualification order, within the meaning of Chapter 4 of Part 14 of the Act of 2014, whether by virtue of that Chapter or any other provision of that Act, or (ii) a disqualification outside the State to like effect which corresponds to a disqualification order within the meaning of Chapter 4 of Part 14 of the Act of 2014;		
(d)	if the relevant person is an individual, whether he or she is adjudicated bankrupt or is subject to proceedings for a declaration of bankruptcy or becomes an arranging debtor;	As part of the FCA, the Applicant and their Supporting Entity, Amazon.com Inc., were assessed against these criteria, and it was concluded that no information or details were identified which indicate that such offences or disqualifications apply.	Satisfactory
(e)	if the relevant person is a body corporate, whether it— (i) has commenced a voluntary winding-up or is subject to a winding-up order or is subject to proceedings for such an order, (ii) is subject to the appointment of a receiver or examiner, or	As part of the FCA, the Applicant and their Supporting Entity, Amazon.com Inc., were assessed against these criteria and it was concluded that no information or details were identified which indicate that such offences or disqualifications apply.	Satisfactory

	(iii) has proposed a compromise or arrangement that is sanctioned under section 453(2) of the Act of 2014 or section 201(3) of the Act of 1963;		
(f)	if the relevant person is a body corporate incorporated under the law of another state— (i) whether an event which corresponds to an event referred to in clause (c) has occurred in relation to any of its directors, or (ii) whether an event which corresponds to an event referred to in clause (e) has occurred in relation to the body corporate;	As part of the FCA, the Applicant and their Supporting Entity, Amazon.com Inc., were assessed against these criteria, and it was concluded that no information or details were identified which indicate that such offences or disqualifications apply.	Satisfactory
(g)	whether the relevant person, or a person acting for or on behalf of the relevant person in the relevant person's capacity as such, has (or has access to), or continues to have (or have access to), as the case may be, the requisite technical knowledge or qualifications, or both, to undertake the proposed maritime usage, or continue to undertake the maritime usage, as the case may be;	Assessment of the technical capability of Amazon MCS Ireland Limited to deliver the proposed maritime usages the subject of the MAC application is detailed in Section 6.2.1 below. The Applicant is considered to have the requisite technical knowledge and qualifications to undertake the proposed maritime usage.	Satisfactory
(h)	whether the relevant person is likely to be in a position to meet, or continue to meet, as the case may be, any financial commitments or obligations that the MARA reasonably considers will be	A FCA report dated 02 June 2026 has been prepared by external financial consultants, Ernst & Young (EY) , who assessed the applicant's financial capability to carry out the proposed maritime usages. Based on the results from the financial capability tests and the information submitted, it is considered that the Relevant Person is viewed as passing the assessment.	Satisfactory

	entered into or incurred by the relevant person— (i) in undertaking the proposed maritime usage, or in continuing to undertake the maritime usage, as the case may be, or (ii) in ceasing to undertake the proposed maritime usage or the maritime usage, as the case may be;	Due to the commercial sensitive nature of a company's finances, details of the assessment are not included herein. The Applicant and their supporting entity, Amazon.com Inc., are considered likely to be in a position to meet financial commitments associated with the proposed maritime usage and MAC.	
(i)	the previous performance of the relevant person when granted— (i) a MAC, (ii) a development permission, (iii) a licence, or (iv) an authorisation (howsoever described) under the Act of 1933.	MARA has undertaken a review of MACs (including associated development permission under MARA's remit for enforcement), maritime usage licences and foreshore authorisations held by the applicant. Based on the review, MARA is not aware of any non-compliances with these consents, there are no enforcement actions pending and there are no outstanding debts owed.	Satisfactory

6.2.1 Technical Capability Assessment (TCA)

Based on the information supplied by the Applicant, the TCA for this application has been carried out on the basis that the proposed scheme is a Schedule 10 project. Schedule 10, Part 5 prescribes “*Development consisting of the laying of a telecommunications cable or pipeline of not less than 15 kilometres in length*” as a class of development specified for inclusion in the Eighth Schedule of the Planning and Development Act as amended.

This determination is for the purposes of TCA only and does not prejudice the planning process as it should be noted that the ultimate arbiter of whether a project falls under Schedule 10 or not is An Coimisiún Pleanála.

Applicant’s Corporate Project Experience:

The minimum criteria under the TCA test relating to the Applicant’s corporate project experience are:

- a) 12-months continuous experience at the development (design and consenting) stage for a project of a similar scale and nature.
- b) 12-months continuous experience at the construction stage for a project of a similar scale and nature.
- c) 12-months continuous experience at the operation and maintenance stage for a project of a similar scale and nature.

For reference, the scale and nature of the proposed project, the subject of this MAC application, is as follows:

Nature – Subsea telecommunications or fibre optic cables

Scale – Scale consistent with Schedule 10 project (i.e. in excess of 15 kilometres in length in the maritime area)

The applicant has provided details for the following seven projects in respect of demonstration of their corporate project experience, gained working at the development, construction and operation and maintenance stages of projects of a similar scale and nature. The Applicant states that all projects identified in the TCA1 form submitted with the MAC application have been developed by companies within the Amazon Group.

Beaufort Cable System: Kilmore Quay (2022 – present) Ireland - Newgale, Wales (UK). The Applicant states that this cable is currently in the construction phase, having moved through the development stage.

NDA Covered System #1: UK – Belgium (2022 – present) The Applicant states that this cable system was due to move to the operational phase in 2025.

NDA Covered System #2: UK – France (2022 – present) The Applicant states that this cable system is due to move to the operational phase in 2026.

BiFrost: Oregon Landing, USA (2021 – present) The Applicant states that this cable system was due to move to the operational phase in 2025.

Fastnet: USA - Co. Cork, Ireland (2023 – present) The Applicant states that this cable system has moved to the construction phase and is due to be operational in 2028. This is the cable system, which is the subject of this MAC application, therefore only experience relating to the development stage can be relied upon for the purposes of this TCA.

The Applicant states that they have project experience for planning, design, contractor management, construction supervision, testing/commissioning and continue to have “responsibility for the operation and maintenance of the subsea cable” in relation to the Jupiter cable. The Applicant further states that they have “*experience in managing the operating of the Submarine Line Terminal Equipment on various cables including MAREA and Havfrue*”.

The Applicant has not provided specific project details regarding the Confidential Pacific System or Jupiter cables which were named in the application.

On the basis of the information submitted, the applicant has satisfied the essential criteria in relation to previous corporate project experience - i.e. 12-months continuous experience at the development, construction, operation and maintenance stages of a project or projects of a similar scale and nature.

Proposed Project Delivery Team Experience:

The minimum criteria under the TCA test relating to the Applicant’s project delivery team experience are:

- a) 10 years of experience with marine projects of a similar scale and nature, with experience gained at the development and construction stages of the reference project.
- b) 10 years of experience with other projects of a similar scale and nature (including terrestrial projects), with experience gained at the development and construction stages of the reference project.
- c) 10 years of experience of the Irish Planning system delivering projects of a similar scale and nature (including terrestrial projects).

The Applicant has listed seven team members of the project delivery team under Part 3 of the TCA1 form and has provided CVs in relation to all seven proposed team members. The Applicant states that all employees identified in the TCA1 form submitted with the MAC application are employed by companies within the Amazon Group.

All CVs were fully reviewed as part of this assessment. The team members listed have demonstrated the required experience of marine projects of a similar scale and nature and the required experience of the Irish Planning system. It is not expected that all members of the team will meet all of the required criteria and therefore what is considered is that the team meet the criteria in aggregate, therefore the Applicant has supplied sufficient evidence of project team experience to satisfy the minimum criteria for the TCA test relating to the Applicant’s project delivery team experience.

Accordingly, MARA considers that the Applicant has provided sufficient details to meet the minimum criteria under the TCA test relating to the Applicant’s project delivery team experience.

Delivery Timelines

The Applicant has completed Part 5 of the TCA1 form which refers to details on the proposed project delivery timelines. Table 5 in Appendix Tec C: Delivery Timelines outlines the key milestone delivery timelines and demonstrates how the project will progress from submission of the planning application, to signing of the main contractor agreement to planned maintenance activities.

The project delivery timelines submitted appear to be realistic timelines for the proposed project including obtaining a MAC consent, development consent, construction phase and operational/decommissioning phase. The Applicant states that a contractor is already appointed for the construction stage of the project. MARA considers the Applicant has demonstrated a realistic understanding of the complexities and probable timeframes of developing a project of this scale and nature in an Irish context.

TCA Conclusion

Following an assessment of the full suite of documentation provided by the Applicant, MARA considers that Amazon MCS Ireland Limited have satisfied all the criteria under the Technical Capability Assessment of the Fit and Proper Test.

Based on the outcome of the Technical Capability Assessment, MARA considers that Amazon MCS Ireland Limited have the requisite technical knowledge and qualifications to undertake the proposed maritime usage.

6.3 Rehabilitation Schedule

Under Section 96(1) of the Act, it is required that the holder of a MAC shall, before the expiration of the MAC, rehabilitate that part of the maritime area the subject of the MAC. In accordance with Section 75(5) of the Act, as for MAC applications made to MARA on the basis of Section 75(1) of the Act, the applicant is required to attach a Rehabilitation Schedule to their associated application for development permission.

6.4 Section 83 – Nature of Use

Section 83(1) of the Act requires MARA in the granting of a MAC to specify whether the specific part of the maritime area the subject of that MAC is for exclusive use or not. Section 83(1) provides MARA discretion and flexibility to specify the nature of the use (i.e. exclusive, non-exclusive or may/may not be exclusive).

The Applicant has sought that the MAC be granted on a may or may not be exclusive basis. The Applicant stated that it may be necessary to exclude access to parts of the MAC area on a temporary basis *“for example, during the installation, maintenance, decommissioning and rehabilitation phases for health and safety reasons”*.

Having regard to the nature and lifecycle of the proposed maritime usage the subject of this application, it is reasonably foreseeable that Amazon MCS Ireland Limited may be required to exclude access to parts of the MAC area on a temporary basis. For example, during construction, maintenance/repairs, decommissioning and rehabilitation phases for health and safety reasons. Such temporary/ short-term exclusions may be mandated by the planning authority or other authorities or legislation for specific purposes and durations. Accordingly, it is recommended that the MAC is granted on a “may or may not be exclusive” basis contingent on circumstances that may arise after the granting of the MAC” in accordance with Section 83(1)(c) of the Act.

6.5 Levy

An annual MAC levy has been calculated based on the project type and proposed MAC area in accordance with MARA's MAC levy framework, as set out below.

MAPA Levy Framework Part:	Nearshore (HWM – 3NM)	Outer Maritime Area (3NM – 12NM)	Outer Maritime Area (12NM – Outer Maritime Boundary)
Category/Class:	Cables, pipelines and ducting		
Applicable Rate:	Base Annual Charge of €321.14 up to 75 LMs + €4.28 per LM for the next 22,165 LMs, €2.14 per LM for the next 22,240 LMs, €1.07 per LM for the next 22,240 LM's and €0.535 per LM for the remaining LM's.		Note: The levels for telecommunication cables will only be applied in respect of the portion of cables present in Ireland's territorial sea, i.e. within the 12nm zone
Length	8244 LM	27331 LM	562547 LM
Calculation:	€321.14 + (€4.28 * 22,165.00) + (€2.14 * 13,335.00)		N/A
Levy due:	€123,724.24		N/A

The MAC levy has been calculated as €123,724.24 per annum. All levies are indexed to the Harmonised Index of Consumer Prices (HICP), applied on an annual basis.

7. Proposed MAC Map (for Illustration purposes only)

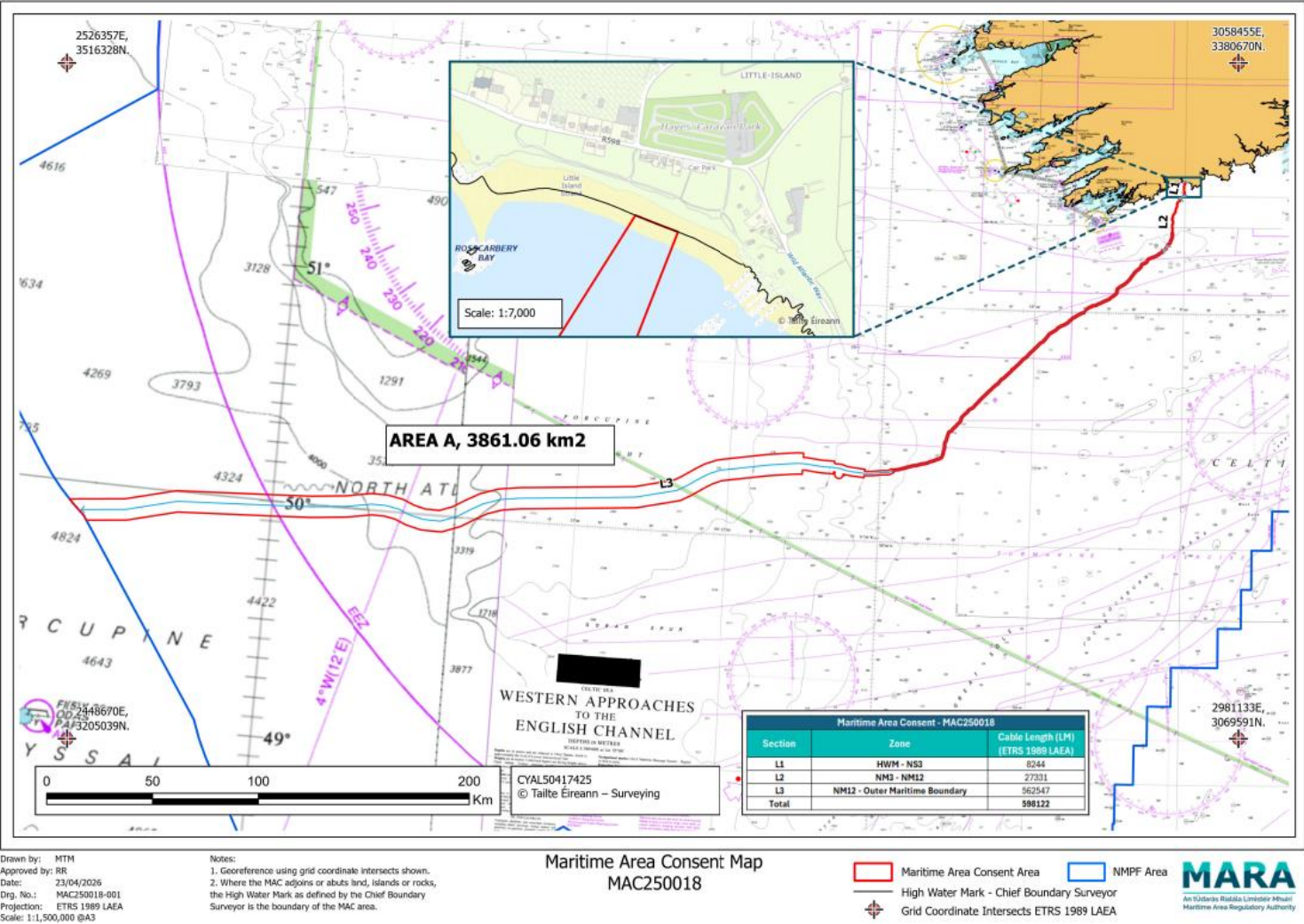


Figure 2: Proposed MAC Map

8. Discussion

Based on the assessments undertaken contained herein, it is considered that the proposed MAC application complies with all the necessary requirements of Schedule 5 of the Act, where relevant and appropriate, subject to the following recommended terms and conditions:

a. Terms

MAC Term:	30 Years
Consent Area:	That part of the maritime area marked red on the MAC Map.
MAC Map Title:	Maritime Area Consent Map MAC250018 Drawing Number: MAC250018-001; Date: 23/04/2026
Permitted Maritime Usage:	The installation, use, operation and maintenance of a telecommunications fibre optic cable including all associated decommissioning, demolition, rehabilitation and any other works required on foot of any development permission relating to the infrastructure.
Nature of Usage:	May/May Not be Exclusive
Date by which application for Development Permission must be submitted:	18 months from date of grant of MAC.
The minimum number of days in which the MAC Holder shall provide the Grantor advance notice in writing of the Holder's intention to commence the Permitted Maritime Usage.	14 Days

b. Conditions and Reasons for Conditions

Section 82 of the Act specifies that MARA may attach to a MAC one or more conditions which fall within the types of conditions specified in Part 1 of Schedule 6 of the Act. All conditions contained in Schedule 6; Part 2 are deemed to be attached to a MAC.

The standard suite of MARA conditions reflecting the contractual and statutory relationship that will exist with a grant of consent are also recommended. Reasons for these conditions are set out in the enclosed Section 81(7)(b) Minded to Notice.

Following assessment of this MAC application, a number of additional specific conditions and the reasons for these conditions to be attached to the MAC, are recommended below. Discussion in relation to each recommended condition is also provided.

23. Public Engagement Plan

In the event of a grant of planning permission, the Holder shall 6 weeks prior to the commencement of the development, submit to the Grantor, a public and stakeholder engagement plan. This engagement plan shall ensure it complies with all the relevant planning particulars, and any relevant Best Practice Guidance if available, and shall at a minimum address the following topics;

- Stakeholder Identification;
- Engagement principles;
- Scope of engagement;
- Engagement methods and tools;
- Engagement Schedule;
- Communication Plan;
- Monitoring and evaluation and adaption of engagement plan;
- Issue management, and;
- Documentation and record keeping.

The engagement plan shall be published, maintained, updated and adhered to, ensuring there is public and stakeholder engagement at the earliest stage possible, and continuing during all phases of the proposed maritime usage for the duration of the MAC term.

Reason: To enable the Grantor to request the Holder to communicate information that the Grantor deems relevant to the public

It is considered that the application for a MAC complies with all the requirements of Part 4 of the Act, with particular regard to Schedule 5 criteria. Accordingly, it is recommended that the proposed MAC is granted with conditions.

9. Conclusion & Recommendation

Following a detailed assessment of all information on file, it is considered that the proposal complies with all the necessary requirements. Accordingly, it is recommended to issue a Section 81(7)(b) Minded to Notice, as enclosed, informing the Applicant that MARA is minded to grant a Maritime Area Consent subject to the proposed conditions attached to the MAC. It is recommended to allow the Applicant 21 days from the date of issue of the Minded to Notice to submit supplementary material in relation to the reasons for the conditions as per Section 81(7)(b)(ii).

Once a final determination is made by MARA, the Applicant will be notified and MARA will publish a notice on its website as soon as practicable thereafter.

Signed: Karen McCluskey

Position: Consenting Analyst, MAC Directorate

Signed: Robert Roche

Position: Marine Analyst, MAC Directorate