



September 19th, 2025

[licence@mara.gov.ie](mailto:licence@mara.gov.ie)

**RE: Request for Observations - MUL240042 - marine site surveys and investigations including geophysical, geotechnical, environmental, intertidal benthic and marine mammal surveys at Dognose Bank, Corkbeg, Whitegate, Co. Cork**

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the Marine usage Licence **MUL240042 - marine site surveys and investigations including geophysical, geotechnical, environmental, intertidal benthic and marine mammal surveys at Dognose Bank, Corkbeg, Whitegate, Co. Cork.**

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

### **SFPA Observations Summary**

The SFPA advised that Cork Harbour is a Classified Live Bivalve Molluscan production area in accordance with Commission Implementing Regulation (EU) 2019/627 for the commercial harvesting of Oysters for human consumption.

The northern end of the 98.55-hectare site proposed for site investigation works is located approximately five kilometres downstream from an active Oyster production area.

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

Government Buildings, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85 TX47

T +353 (0)23 8859500

[gov.ie](http://gov.ie) - Department of Agriculture, Food and the Marine ([www.gov.ie](http://www.gov.ie))



Lower Cork Harbour is actively fished for Shrimp from the months August to October and for Lobster and Crab year-round and the proposed survey activities could negatively impact on existing fisheries. The identified means of conducting both Geotechnical and Geophysical surveys could also significantly disrupt the existing crustacean fisheries.

### **MI Observations Summary**

The MI advised as the Oyster farm occurs within the locality of the proposed works, the proposed geotechnical survey activities could potentially increase water turbidity resulting in a smothering event, with vibrations simultaneously negatively impacting feeding behaviour. This could negatively impact aquaculture productivity.

The degree and severity of impact and potential for this to happen is however unknown and would in part be dependent on direction and state of the tidal cycle when works are undertaken.

Pot fishing can take place in the vicinity of the proposed site survey and investigation works outlined by the Port of Cork. Such being the case, Vessel Monitoring System (VMS) data regarding fishing in the area may be limited as many of the vessels in the inshore fishing segment (less than 12 metres in length) are not currently required to carry VMS systems on board.

These activities could be negatively impacted through reduced catch rates owing to changes in behaviour due to seismic reflection surveys and in extreme cases potential mortality to both adult and juvenile portions of local stocks depending on proximity and intensity of seismic activity.

While the above reports highlight some negative potential effects, DAFM's Marine Engineering Division (MED) noted the works proposed seem to be typical of marine geotechnical investigations carried out in Ireland and are temporary and short-term in nature and small in the context of Cork Harbour. They also highlight that it could be possible that any sediment released into the environment due to these works will be localised to the site and quickly dispersed under normal hydrodynamic conditions.

Please see the attached reports from the SFPA and the MI for further information on their findings.

Due to the potential effects identified, relevant local fishing and aquaculture operators should be included on the provision of any Notices to Mariners in this



respect and be made aware of proposed site survey and investigation works at the earliest opportunity.

DAFM would seek confirmation, that where there are any indirect impacts on traditional fishing grounds identified, consultation with local stakeholders will be undertaken prior to and throughout the works and a Fisheries Liaison Officer (FLO) will be appointed to liaise with all the relevant sea going and foreshore users in advance of any marine survey operations.

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 **MUL240042** 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 Aquaculture) should be followed and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas.

Yours sincerely,

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