Request for Observations from Public Bodies MUL250013

Proposed activity:

Site investigation to inform detailed engineering design for the Greater Dublin Drainage Project

BIM Comments:

Fisheries

BIM acknowledge the AIMU report highlights the known *"nursery grounds for commercially important fish species that overlap the MUL Area including: cod (Gadus morhua), haddock (Melanogrammus aeglefinus), whiting (Menticirrhus americanus), mackerel (Scomber scombrus) and horse mackerel (Trachurus trachurus). One known spawning ground for cod overlaps the MUL Area. A haddock spawning ground is located approximately 2 km east of the MUL Area and there is a herring nursery ground approximately 10 north of the MUL Area. Inshore fishing activity that occurs within the MUL Area is dredge fishing for razor clams, which extends from the southwest of the Howth peninsula to the coast of Dunany Point in Louth. Net fishing for mixed demersal species occurs within and north of the MUL Area, extending from Howth Peninsula to Carlingford, Louth during March to September. Pot fishing occurs in inshore waters all along the east coast of Ireland and overlaps directly with the MUL Area for mixed demersal species during March to September (Irelands Marine Atlas, 2025). "*

The main concern from a fisheries context would be disturbance to fishing, and accidental entanglement with static fishing gear by the survey vessels, and/or by fishing vessels with the deployed survey equipment. Disturbance to fishing activities is likely to be minimal as BIM can't see a requirement for fishers to stay out of the study areas. However, the risk of damage to static fishing gear and deployed survey equipment is a more realistic one. Instances of this has happened historically, where strings of pots were reported as being towed by survey vessels.
The main comment to make therefore is that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising from such incidents as stated above.

Therefore, timely notification to notify fishers on the ground, through direct contact using the Irish Fleet Register Sea-Fishing Boat Licence Applications, Forms and Conditions should be taken. Additional, usual channels of communication, such as Marine Notices, the Producer Organisations such as the IS&EFPO, IIMRO, NIFA, local RIFF, all the relevant harbour port offices and local authority offices, and local media including Marine Times where possible covering the impacted area.

Aquaculture

BIM acknowledge the AIMU report highlights the following: *"There are no aquaculture sites within or adjacent to the MUL Area. The nearest licenced aquaculture sites are located in Carlingford Lough in Co. Louth, approximately 65 km from the northern boundary of the MUL Area and at Clogga Bay off the coast of Wicklow, 95km south of the MUL Area (Marine Atlas, 2025). Given the distances between the SI works areas and the aquaculture sites there will be no interaction with aquaculture."* BIM agree there will be affects on aquaculture with this activity.