



13<sup>th</sup> November 2025

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**RE: Request for Observations – MUL Reference: MUL250013**

A Chara

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application from Uisce Éireann for a Maritime Usage Licence for Site Investigations (SI) to inform detailed engineering design for the Greater Dublin Drainage Project (GDD). The Maritime Usage Licence is required to undertake site investigations within Baldoyle Bay and the Irish Sea.

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 site investigations** 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) and Bord Iascaigh Mhara (BIM) on the application were requested.

The MI noted in the application, the indicated areas are coincidental with spawning and nursery grounds of a range of commercial fish species, including:

Cod Nursery and Spawning Grounds; Haddock Nursery Ground; Horse Mackerel Nursery Ground; Mackerel Nursery Ground; Whiting Spawning Ground.

Independently, the proposed survey operations should not substantially interfere with fish stocks, fishing activities or aquaculture activities in the area. It is assumed that the necessary notices to mariners / fishing vessels will be made regarding the deployment of seafloor monitoring devices.

However, the MI highlight there is potential for cumulative impacts between these and other survey activities that may be active in the local vicinity.

BIM notes that 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

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vessels with the deployed survey equipment. Disturbance to fishing activities is likely to be minimal and BIM cannot 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.

BIM comment that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising from such incidents as stated above. BIM agree there will be no impacts on aquaculture with this activity.

Inshore fishing activity, in particular pot fishing and dredge fishing for razor clams, occurs within, and adjacent to, the Maritime Usage Licence (MUL) Area. However, it should be noted that Vessel Monitoring System (VMS) data regarding fishing activity in the MUL 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. While the proposed site investigation works are not anticipated to impact unduly on inshore fisheries, relevant local fishing organisations should nevertheless be included on the provision of any Notices to Mariners in this respect and be made aware of proposed works at the earliest opportunity. In this regard, the Department welcomes the confirmation that Uisce Éireann will inform all sea users prior to activities commencing via a marine notice.

The Assessment of Impacts on the Maritime Usage (AIMU) Report sets out that potential effects on fisheries during the site investigation works will be reduced by ensuring that best practice methods are followed and standard control measures for prevention of impacts on the environment during the SI works are complied with.

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 **proposed site investigation works** 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.

DAFM notes that Uisce Éireann will inform all sea users prior to activities commencing via a marine notice. 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.



Please also find attached documents from the **MI and BIM** which provide further comments for consideration. In particular, **that early and continuous communication is made with stakeholders in the survey areas to avoid accidental entanglement with static fishing gear by the survey vessels.**

Yours sincerely,

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