



January 9, 2026

licence@mara.gov.ie

RE: Maritime Usage Licence Application - Reference MUL250020

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on Kilrush Maritime Ltd.'s application for a Maritime Usage Licence to undertake maintenance dredging of the approach channel to Kilrush Marina situated on the northern shore of the lower Shannon Estuary in Co. Clare.

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 dredging is 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 note that the indicated dredging area is coincidental with spawning and nursery grounds of a range of commercial fish species. However, it is noted that the spatial extent is extremely small, operations are of a limited time, and hydrodynamic models are indicative of limited particulate distribution. Independently, the proposed operations should not substantially interfere with fish stocks, fishing activities or aquaculture activities in the locality. The MI also note that there is potential for cumulative impacts between these and other survey/dredging activities that may be active in the local vicinity and/or near timeframes.

BIM do not anticipate any issue regarding inshore fisheries from the proposed activity. BIM acknowledge that the SISAA & NIS reports reference the aquaculture activity and licensed sites supporting both mussel and oyster cultivation within the Shannon Estuary. The AA reports indicate there is a low concern of suspended sediments due to dilution factors, however, there is potential for some impact from resuspending sediments which may contain heavy metals and bacterial loads which could affect downstream Bi-Valve Classification production areas, which contain active licenced sites, some of which are Classified as Class A production areas.

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Therefore, continuous direct communication from Kilrush Maritime Limited with local shellfish operators, IFA aquaculture, BIM, MI and SFPA on dates of activity and when it will cease is advised to give aquaculture producers and competent authorities more knowledge and insights into when to harvest or not to prevent any food safety concerns during this temporary dredging activity.

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 dredging 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.

All relevant fishing organisations should receive any applicable Marine Notice/s, and be made aware of any proposed works, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible. Organisations representing inshore vessels include:

- The National Inshore Fisheries Forum (NIFF): <https://inshoreforums.ie/niff/>
- The Irish Islands Marine Resource Organisation (IIMRO): <https://www.iimro.org/>
- The National Inshore Fishermen's Association (NIFA): <https://inshore.ie/>

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

Yours sincerely,

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine