

Kilrush Maritime Ltd
Kilrush Marina, Merchants Quay, Kilrush, Clare, V15 AD62

By email only louis.keating@kilrushmarina.ie

Date 07/08/2026

Request for Additional Information: Section 117(3) of the Maritime Area Planning Act 2021

Maritime Usage Licence Application Reference: MUL250020

Dear Applicant,

I refer to the above referenced maritime usage licence application received by the Maritime Area Regulatory Authority (MARA).

MARA considers that it requires additional information as set out below in order to determine the licence application.

1. Confirmation of dredge methodology

Attachment 3.1 Description of Proposed Maritime Usage and Section 3.1A in the Application Form state that plough dredging will be utilised, with no disposal site outlined nor methodology included, presumably as plough dredging does not require disposal at a separate site. However, Attachment 4.3 SISAA and NIS states that *“the dredged material is proposed to be disposed of at a licensed offshore dumping site in accordance with relevant environmental legislation and permitting requirements”*. “Offshore disposal site” is referenced several times throughout the SISAA and NIS, although “disposal site at Kilrush Marina” is also mentioned, and the Appendix 1 to this document states *“the dredge site itself also functions as the dumpsite....This approach is consistent with previous maintenance dredging campaigns at Kilrush, which were accepted under earlier Dumping at Sea permits”*. We note that a DaS licence was applied for in 2025, and the boundary aligns with the current MUL boundary, with no separate offshore site.

Can the applicant confirm the method of dredging to be undertaken is to be plough dredging as described in the majority of your application.

Can the applicant also confirm if dumping at an offshore site is to be undertaken or not.

address:

An tÚdarás Rialála Limistéir Mhuirí / Maritime Area Regulatory Authority
2^ú hUrlár, Teach Menapia, Páirc Ghnó Dhraighní Draighneach Loch Garman, Y35RF29.
2nd Floor, Menapia House, Drinagh Business Park, Drinagh, Wexford, Y35RF29.

email:

licence@mara.gov.ie

website:

www.maritimeregulator.ie

2. Sediment contaminants

It appears that no sediment contaminant sampling results have been referenced in the environmental assessments. While the SISAA/NIS considers *Potential Impact Mechanism 1: Pollution of marine environment from spills/leakages*, historic sediment contaminants have not been considered. The WFD Assessment contains the following information, however full references for these reports has not been provided, nor have they been included as an appendices.

"Sediment quality in the approach channel to Kilrush Marina has been confirmed as clean and suitable for disposal at sea. A detailed sediment characterisation survey conducted in 2020, with follow-up resampling later that year, analysed metals, organochlorines, PCBs, hydrocarbons, organotins, and PAHs. With the exception of an initial elevated cadmium value at one station, which was later shown with resampling to be within acceptable levels (0.3 mg/kg), all results were well below the lower Irish action limits for dredge material. Concentrations of PCBs, PAHs, hydrocarbons, and organotins were also consistently low, and the sediments were found to be composed primarily of clean fine sands with minor silt and clay fractions. Subsequent sampling in 2023 at four stations found that all heavy metals were below the lower action levels with exception to copper, nickel and zinc which were below their upper action levels. This demonstrates that the dredged material is naturally derived, uncontaminated, and poses no risk of introducing pollutants into the receiving environment. On this basis, no deterioration in chemical status is anticipated as a result of the works within the ZOI."

Can the applicant please submit all reports and survey information relating to previous sediment contaminants as reference in their WFD assessment.

3. Annex IV Derogation

With reference to the strict protection of species listed under Annex IV of the Habitats Directive (92/43/EEC), confirm if you are required to apply for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. If yes, provide details of the application submitted, including the NPWS Derogation Number or application reference number.

The requested information should be submitted to MARA (by email to licence@mara.gov.ie) within 2 weeks of the date of this notice, (by **21/08/2026**) in order for MARA to assess the licence application. Should you require an extension to this date (for good and sufficient reason), please contact us at your earliest possible opportunity.

address:

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Please refer to MARA's [Guidance Note for Applicants applying for a Maritime Usage Licence \(MUL\)](#) when providing the information requested.

If you have any queries in relation to this matter, please do not hesitate to contact the Maritime Usage Licensing Team at licence@mara.gov.ie.

Yours faithfully,

Paula O'Toole
Maritime Usage Licensing Team
MARA