



March 24, 2026

licence@mara.gov.ie

Re: MUL230024MA – Deep Sea Fibre Networks

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application for a material amendment to Licence MUL230024. The applicant is requesting to remove Specific Condition 37 regarding fish spawning and nursery grounds to allow the marine usage to be undertaken between 1st February and 30th June.

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 material amendment is being evaluated.

DAFM wishes to reiterate that 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) on the material amendment to the licence granted were requested. The application document states "*There is no significant overlap with fishing activities in the region*" however there are overlaps with important prawn fishing grounds "The Aran Grounds" Functional Unit 17 and regions of high fishing activity catching anglerfish, boarfish horse mackerel, mackerel, megrim and squid. However, the MI do note that proposed activities should not have **any significant or long-lasting impacts** on fish biology, ecology, fisheries activities or aquaculture.

The MI advise that survey activity avoid the *Nephrops* ground Functional Unit 17 and herring spawning beds in Liscannor Bay between September and December.

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

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the cable surveys 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 where the cable surveys may traverse traditional fishing grounds, fisheries liaison and consultation with local stakeholders will be undertaken prior to and throughout the works. In this regard, DAFM seeks confirmation that 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. All relevant fishing organisations should receive any applicable Marine Notice/s and be made aware of any proposed site survey and investigation work, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible.

Please also find attached document from the Marine Institute which provides further comments for consideration.

Yours sincerely,

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