

Advice Request- MUL230024- Feb-2026_Response on special condition.docx

Marine usage licence ref MUL230024 for marine survey and site investigation works at Ballyloughane, county Galway & Atlantic ocean

Jonathan White, Hans Gerritsen, Cormac Nolan – Marine Institute Version 1 – 23/February/2026

FEAS were requested by DAFM in relation to:

MARA have opened a [public consultation](#) seeking a material amendment to MUL230024, for which DAFM and MI's responses are attached.

The applicant is requesting an amendment to the existing licence to remove Specific Condition 37.i) regarding fish spawning and nursery grounds from the Licence to allow the marine usage to be undertaken between 1st February and 30th June.

The applicant has the view that the special condition is an onerous and overly restrictive condition, which is perhaps at odds with advice from DAFM and MI, and the appropriate assessment.

Considering this could MI please review the initial response and provide observations on the application for the material amendment.

Please provide a response 13th March.

In response:

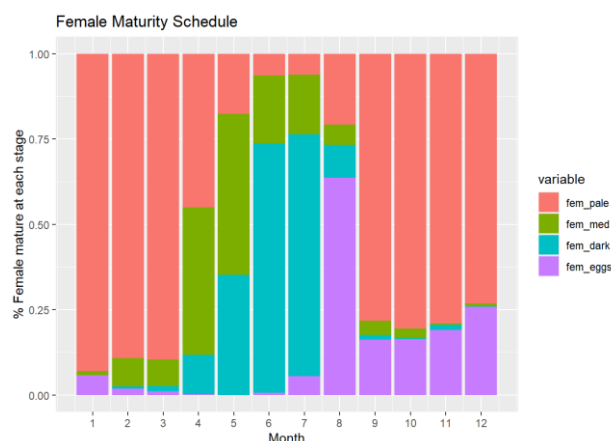
The proposed activities should not have any significant or long-lasting impacts on fish biology, ecology, fisheries activities or aquaculture.

Points to highlight from observations provided in February 2025:

- The survey route passes through prawn fishing grounds "The Aran Grounds" Functional Unit 17 (FU17).
- Application states "*There is no significant overlap with fishing activities in the region*" while there are overlaps with FU17 and regions of high fishing activity catching anglerfish, boarfish horse mackerel, mackerel, megrim and squid.
- It is not expected that any long-lasting effects on fish or habitats of significance would result from the proposed survey.
- Effect on recreational activities expected to be minor.

Further, from the perspective of most fish species/stocks and fishing activities, the request is appropriate. It would be advisable to avoid the *Nephrops* ground Functional Unit 17 and proximity to herring spawning beds in Liscannor Bay between August and December.

There is strong debate over the effects of high energy acoustic survey operations on fish and benthic organisms including crustaceans, with the *Nephrops* and herring fishing communities acutely aware of this.



Nephrops Female maturity schedule of FU17.

Egg bearing female *Nephrops* are most abundant in Functional Unit 17 late summer to December (Figure right).

The survey area also comes close to herring spawning grounds (Liscannor Bay), with similar debate around levels of sound energy emitted by Geophysical sub bottom profilers and impacts on herring spawning. Most recent evidence indicates peak spawning of herring in Liscannor Bay is from September to December inclusive¹.

Without specific acoustic attenuation studies of energy input, water densities and energy dissipation levels it is not possible to be definitive, however it is likely that the sound energy would have dissipated to insignificant levels at the implied distances. It may however, be advisable to avoid these areas between September and December if possible to circumvent potential issues. With the proposed dates flagged as 1st February and 30th June this should be possible.

¹ O'Sullivan, David & O'Keeffe, Eimear & Berry, Alan & Tully, Oliver & Clarke, Maurice. (2013). An Inventory of Irish Herring Spawning Grounds. Irish Fisheries Bulletin. 42. 10.1002/9781118527085.ch1.
https://www.researchgate.net/publication/257327726_An_Inventory_of_Irish_Herring_Spawning_Grounds