



Licence Ref: **MUL260003**  
(Please quote in all related correspondence)

8<sup>th</sup> April 2026

Maritime Area Regulatory Authority  
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Drinagh Business Park  
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Y35RF29

Via email: [licence@mara.gov.ie](mailto:licence@mara.gov.ie)

Referral under Regulation 42(6) of the European Communities (Birds and Natural Habitats) Regulations

**Re:** Maritime usage licence application for testing equipment (underwater technology on ROVs and AUVs to survey and support salvage of anthropogenic structures (wrecks) by creating 3D and other models from data) in saline waters in the North Atlantic South Coast Cork

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I refer to correspondence received in connection with the above. Outlined below are heritage related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading(s).

### **Archaeology**

In light of the below observations, the following recommendations are provided to assist MARA to ensure the proposed marine surveys will align with statutory obligations and policy objectives for the protection of the State's underwater cultural heritage.

The Department recommend MARA issue the following FURTHER INFORMATION request relating to the Maritime Usage Licence application under the Maritime Area Planning Act 2021:

#### **1. Consultation with Department of Housing, Local Government and Heritage**

In advance of any decision on the MUL application the applicant shall consult and comply with the requirements of the National Monuments Service of the Department of Housing Local Government and Heritage. Specifically, the applicant shall furnish the National Monuments Service with clarifications/details on the following:

- the status of the 'unknown' or 'unidentified' wrecks as per locations given;
- a report on review of additional relevant sources on wrecks for the area



- site specific survey methodologies
- rationale for the proposed 300m<sup>2</sup> around each wreck site
- research and scientific questions, and investigation scope (application refers to both 'testing equipment' as well as 'research' purposes)
- final product data is to be used for if beyond that of equipment testing;
- port/harbour(s) to be used for the duration of the surveys;
- ID details of survey vessel(s) to be used.

**Should MARA proceed to approve the MUL application, the Department recommend MARA include the following CONDITIONS relating to the Maritime Usage Licence application under the Maritime Area Planning Act 2021:**

**1. Consultation with Department of Housing, Local Government and Heritage**

In advance of any survey deployment the applicant shall consult and comply with the requirements of the National Monuments Service of the Department of Housing Local Government and Heritage.

**2. Section 3 National Monuments (Amendment) Act 1987 Licence**

a. The surveys shall be licenced under the National Monuments Acts 1930-2014: a Section 3 1987 National Monuments (Amendment) Act licence shall be required for all survey works. Licence applications, accompanied by Method Statements, shall be sent for approval to the National Monuments Service of the Department of Housing, Local Government and Heritage.

c. The National Monuments Service shall be furnished with a final archaeological report describing the results of the works.

**3. Protocol for Archaeological Discoveries**

A Protocol For Archaeological Discoveries shall be implemented to facilitate reporting to the statutory authorities within 96 hours of any previously unknown wrecks or archaeological objects underwater, in compliance with the National Monuments Acts 1930-2014.

The MUL Licensee shall be prepared to be advised by the National Monuments Service in regard to their statutory obligations to protect underwater cultural heritage or in regard to any subsequent recommendations that may issue. No surveys shall be undertaken until the required Section 3 licence has been approved in writing from the National Monuments Service.

**Observations on MUL260003 application**

The Maritime Usage Licence application encompasses the proposed deployment of remotely operated vehicles (ROVs) and autonomous underwater vehicles (AUVs) to undertake non-invasive surveys of protected shipwrecks off the south coast of Ireland to support potential future salvage operations. The wrecks in question are the SS East Wales, SS Minnehaha, SS Ben Lomond, SS Pinewood, MV Daru, Unidentified submarine, and four other 'unknown' wrecks, located along the Cork and Waterford coast. The submitted *Marine Usage Licence Application Supporting Information for AIMU* report (Oct 2025) notes in relation to Cultural Heritage (including underwater archaeology): 'We assess that there will be no risk of significant impact on cultural heritage, as the purpose of the survey is to collect additional information on wreck sites using non-invasive technologies only'. In considering applications, a key concern of the National Monuments Service is the safeguarding of the protected wrecks in question including from any inadvertent or incidental impacts.



It is noted that each of the proposed survey sites, bar one, is a protected shipwreck recorded in the Wreck Inventory of Ireland Database (WIID), whose location can be seen on the National Monuments Service wreck viewer: <https://www.archaeology.ie/advice-and-support/locate-a-monument-or-wreck/wreck-viewer/>

Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater, irrespective of age. Wrecks that are less than 100 years old and archaeological objects underwater or the potential location of such a wreck or archaeological object can also be protected under Section 3 of the 1987 (Amendment) Act. The minister may issue Underwater Heritage Orders if a wreck, area or object is considered to be of sufficient historical, archaeological or artistic importance to merit such protection. The Wreck Inventory of Ireland Database (WIID) is the official register of historic shipwrecks protected under the National Monuments Acts. All wrecks over 100-years old are protected under the 1987 and 1994 (Amendment) Acts of the National Monuments Acts. Over 18,000 wrecks have been recorded to date, ranging from small fishing boats, dugout canoes and coastal traders to steamships and ocean going ships. Though earlier sources have been included where obtainable, the Inventory is largely based on documentary sources available from after 1700 AD. As such, previously unrecorded wreck sites, including those dating to earlier periods, may await discovery in the marine areas under consideration here.

Should you require any further information or clarification on any of the above submission please do not hesitate to contact this office.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [FEM.dau@npws.gov.ie](mailto:FEM.dau@npws.gov.ie), or to the following address:

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Administration