

Marine Usage Licence Application Response Report



Client: Oceyon

Location: Irish South Coast

Project Ref: OCE001-002

Date: September 2026



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Introduction

Rowan refers to MARA's request for additional information under Section 117(3) of the Maritime Area Planning Act 2021 in relation to the Maritime Usage Licence (MUL) application (MUL260003), and to the seven items of additional information sought. This letter, together with the attachments referenced, sets out Oceyon's response. It is submitted within the 30-day period specified, ahead of the stated deadline of 4 September 2026.

For clarity, our response follows the same numbering and headings used in MARA's request, addressing: (1) the requirement for a Regulation 54 derogation in respect of Annex IV species; (2) consistency with the South Coast Designated Maritime Area Plan (SC-DMAP); and (3) the updated Attachments 4.1, 4.5, 4.6, 4.8, 4.9 and 4.10, provided in the current format required by MARA's Guidance Note for Applicants (November 2025) in place of the equivalent narrative previously included within the AIMU report.

Purpose and Structure of this Report

This purpose of the Report is to provide a point-by-point response to each of the requests for further additional information from Mara.

The Report mirrors the structure of the Request for further additional information, with each of the requests set out in the document for clarity and ease of reference. The response to each request is then provided below the request text in **dark blue colour font**.

This Response Report forms a response to a number of Item requests from Mara, as follows:

- **Item 1:** Habitats Directive Annex IV Species and Regulation 54 Derogation
- **Item 2:** Consistency with the South Coast Designated Maritime Area Plan (SC-DMAP)
- **Item 3:** Updated Marine Planning and Environmental Attachments

The document is supported by a number of attachments that form part of the overall response report. This is detailed below, which shows the full set of attachments that make up the response and these documents are referenced in **bold** through this Report.

The additional supporting documentation appended to this Report are:

- **Attachment 4.1** – Consistency with the National Marine Planning Framework (NMPD)
- **Attachment 4.5** – Consistency with the Water Framework Directive

- **Attachement 4.6-** Consistency with the Marine Strategy Framework Directive (MSFD) and Ireland's Marine Strategy
- **Attachment 4.8** - Consistency with the UN Convention on the Law of the Sea (UNCLOS) and the Maritime Jurisdiction Act
- **Attachment 4.9** - Consistency with the Climate Action and Low Carbon Act 2015, as amended
- **Attachment 4.10** - Consistency with Ireland's 4th National Biodiversity Action Plan (NBAP) 2023–2030

Statement of Authority

This Response Report has been written by Jessica Boyd. Jessica is a Senior Environmental Consultant, having joined Rowan Engineering Consultants Ltd., in February 2024 with over 7 years' experience in Environmental Impact Assessment, in relation to Pharmaceutical, Aggregate Industry and Onshore Wind Developments. Jessica has successfully Project Managed Onshore Wind EIAR's to their successful grant in planning permission. Additionally, Jessica's experience includes Environment and Planning preparation for Onshore Wind, Solar and Battery Energy Storage Systems across Ireland. Jessica holds a BSc in Environmental Management and MSc in Spatial Planning: Cities, Water & Climate Change.

This Response Report has been reviewed by Paola Rodolfi. Paola holds a B.Sc. in Marine Biology and a Master's in Environmental Science. She is a Senior Environmental Planning and EIA Manager experienced in coordinating and preparing Environmental Constraints Reports, EIA reports, AA Screenings, Natura Impact Statements, Strategic Environmental Assessments, for a wide range of projects and applying Geographical Information System (GIS) analysis. She has over 12 years' experience in working with environmental reports for renewable energy projects, wastewater treatment plants, flood relief schemes, land use changes, marine surveys, greenways. She has worked in the EU Marine LIFE Blue Natura Project, assessing blue carbon along the Atlantic and Mediterranean Coast. She has worked as a consultant for the private and public sectors in various countries, including the United Nations Development Programme, to coordinate, assess and develop environmental strategies and reports. She is a Full Member of ISEP.

1. Request for additional information Item 1

MARA's request: "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."

Response to Request for Additional Information Item 1

The Risk Assessment for Annex IV Species submitted with the application (Attachment 4.4, prepared by Rowan Engineering Consultants Ltd, October 2025) identifies harbour porpoise (*Phocoena phocoena*) and bottlenose dolphin (*Tursiops truncatus*) as the Annex IV cetacean species most consistently recorded in the survey area and most likely to be encountered, with common dolphin, marine turtle species and other cetaceans assessed as infrequent or unlikely to be present given the proposed survey window.

The noise assessment in that report concludes that none of the proposed survey equipment (ROV/AUV sonar, Doppler Velocity Log, side-scan sonar or the SeaTrac USBL positioning system) is predicted to generate sound pressure levels exceeding the injury (PTS/TTS onset) exposure criteria for marine mammals or fish at any range, using the Southall et al. (2007) and Popper et al. (2014) criteria. The only effect identified is behavioural disturbance, with a maximum precautionary predicted range of 293 m for marine mammals (from the DVL and side-scan sonar), based on a conservative worst-case spherical propagation model.

Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, makes it an offence to deliberately capture, kill or disturb an Annex IV species, particularly during breeding, rearing, hibernation or migration, or to damage or destroy a breeding or resting place. A derogation under Regulation 54 is required where such an activity, and the resulting disturbance, cannot be avoided.

The survey has been specifically designed, through embedded controls, to avoid any deliberate disturbance to Annex IV species rather than to manage its consequences:

- A Marine Mammal Observer (MMO), appointed in line with the 'Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters' (DAHG, 2014), will carry

out a pre-start visual watch of the relevant zone at each site before any acoustic survey equipment is powered up.

- Acoustic survey equipment will not be activated – and operations will be suspended – if a marine mammal is observed within, or entering, the applicable precautionary range.
- Operations are limited to daylight hours only, are of short duration (generally less than one day per site), and are confined to the immediate area of each wreck (up to c. 5,000 m², see Item 3 / Attachment 4.1 below).
- No physical contact with the seabed, the wrecks, or any species is involved at any point in the survey.

The proposed survey is of short duration, non-invasive, and subject to normal industry controls for an ROV Survey in Irish Waters. The controls include the appointment of an MMO and the application of ‘Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters’ (DAHG, 2014).

As a result, the survey avoids deliberate disturbance within the meaning of Regulation 51, and therefore a Regulation 54 derogation is not required for this survey. Risk to Annex IV species was fully assessed within the Annex IV species Risk Assessment, which accompanied the application. As per the conclusion of the Assessment, no injury to any Annex IV species is predicted under any circumstances and no significant disturbance to any Annex IV species is anticipated from the survey.

As per the information and determination provided in the Annex IV species Risk Assessment which accompanied the application, a derogation is not required in this case.

2 Request for additional information Item 2

MARA's request: "Six of the proposed survey sites are within the South Coast Designated Maritime Area Plan (SCDMAP) Boundary and one of these sites is also within SCDMAP Maritime Area A (Tonn Nua). As such, the applicant should provide information to MARA detailing how the proposed maritime usage is consistent with the South Coast Designated Maritime Area Plan."

Response to Request for Additional Information Item 2

The proposed operations will result in the presence at each site for approximately one day and therefore will not interfere with any activities in relation to these designations. The proposed output of the survey will be confirmation of the location and presence of shipwreck (marine heritage) at these sites as well as providing additional information in relation to these wrecks which Oceyon has committed to sharing and submitting to the relevant government department. As such, the proposed marine activity provides direct benefit to the proposed marine usage in the form of additional baseline information in relation to the proposed future developments.

The SC-DMAP sets out seven objectives against which the consistency of maritime usages within its boundary can be assessed. **Table 2.1** outlines the consistency of the proposed survey against each objective.

Table 2.1 Consistency between Objectives and Proposed Maritim Usage

Objective	Consistency of Proposed Maritime Usage
Plan-Led Development	The survey is a temporary, non-development marine research activity. It does not seek to establish infrastructure or occupy Maritime Area A–D on an exclusive or permanent basis and does not conflict with the Plan's designation of those areas for offshore renewable energy (ORE).
Renewable Energy Directive	Not directly relevant – the survey is not an Offshore Renewable Energy (ORE) project. Oceyon confirms the survey will not obstruct, delay or conflict with the site investigation or development programme for the Tonn Nua project, given its short duration, small footprint and mobile single-vessel operation. Oceyon is willing to liaise with MARA and/or the Tonn Nua developer on scheduling if this is considered useful.

Safeguarding Biodiversity and Natura 2000 Sites	The AA Screening (Attachment 4.3) and Annex IV Risk Assessment (Attachment 4.4) submitted with the application conclude that the survey poses no risk of injury to Annex IV species and a negligible, short-duration risk of disturbance, mitigated by a Marine Mammal Observer applying the DAHG (2014) guidance. See also Item 1 of this response.
Multi-Use Seas	The survey uses a single small vessel for a maximum of 1–2 days per site over a 2–3 week window, with no seabed contact, no exclusion of other users, and a Notice to Mariners issued in advance. It is fully compatible with co-existing navigation, fishing and any concurrent ORE site investigation activity.
Protecting Cultural and Natural Heritage	This objective is the most directly relevant to the proposed Maritime Usage. The survey's sole purpose is the non-invasive, non-contact photographic and acoustic recording of historic wreck sites, in order to better understand and help protect this heritage. Results will be shared with the Wreck Unit of the Department of Housing, Local Government and Heritage and with wreck owners on completion (see also Attachment 4.1 below).
Evidence-Based Planning and Governance	The 3D models and condition data generated will improve the evidence base on underwater cultural heritage assets within the SC-DMAP area, which may also be of use to MARA, the National Monuments Service and future ORE developers (including at Tonn Nua) in their own heritage due-diligence and marine spatial planning.
Benefits for Communities and the Economy	The survey will use Irish ports and locally sourced vessel crew and services, and the resulting public data analysis on heritage assets will be made available to the community at large, consistent with this objective.

In summary, the proposed survey is a short-duration, non-invasive, single-vessel scientific research and heritage-recording activity. It does not conflict with the SC-DMAP's designation of Maritime Area A for offshore wind development and is considered directly supportive of the Plan's objectives for protecting cultural and natural heritage and strengthening the evidence base for future marine planning decisions, including within Tonn Nua itself. Oceyon is happy to coordinate directly with MARA and/or the Tonn Nua developer regarding survey scheduling, should this be useful in avoiding any operational overlap.

3 Request for additional information Item 3

Mara's request: in lieu of the submitted AIMU report, provide Attachments 4.1 (NMPF), 4.5 (WFD) and 4.6 (MSFD) in accordance with current MARA guidance, and address consistency with UNCLOS/the Maritime Jurisdiction Act, the National Climate Objective, and the 4th National Biodiversity Action Plan.

Response to Request for Additional Information Item 3:

The application documents and assessments were drafted and developed based on the templated and guidelines provided by MARA in the Pre-Application Meeting, which was held on the 26th of September 2025. Documents prepared were submitted initially prior to the emerging of the new guidelines. As such, we request that MARA review the documents as were instructed and provided. Should any supplementary assessment or information be required, Oceyon would be happy to provide it.

Nonetheless, attachments are provided in this response document, in the format set out in MARA's Guidance Note for Applicants applying for a Maritime Usage Licence (December 2025), and replace the equivalent narrative previously contained within the AIMU report (Attachment 3.1, October 2025). They should be read together with the Appropriate Assessment Screening Report (Attachment 4.3) and the Risk Assessment for Annex IV Species (Attachment 4.4), which are unaffected by this update and thus have not been re-submitted.

- *Describe how the proposed Maritime Usage is consistent with the objectives of the National Marine Planning Framework. Provide sufficient information addressing the consistency of the proposed Maritime Usage with the objectives of the NMPF. This information should be provided as Attachment 4.1. Emphasis should be made on the interaction of the proposed maritime usage with underwater archaeology and/or cultural heritage.*

Response to Request for Additional Information Item 3– Bullet 1

Section 3.4 of the AIMU report and cross referenced in the application, indicated that the project does not consist of any risk or impact to the objectives of the National Marine Planning Framework. Specifically, the proposed operations are in line with the marine planning policy with regard to providing further information of heritage assets, the commitment to share information with the responsible government parties, and providing additional information to support the

Heritage Assets Policy 1 by contributing to enhancing the significance of heritage assets through survey, information and visualisation.

- *Provide sufficient information addressing the consistency of the proposed Maritime Usage with the objectives of the Water Framework Directive. This information should be provided as Attachment 4.5. Note that one survey site overlaps WFD waterbody (Western Celtic Sea (HAs 18;19;20) – WFD code IE_SW_010_0000)*

Response to Request for Additional Information Item 3– Bullet 2

Section 3.2 of the AIMU report noted that the project does not indicate that the project does not consist of any risk or impact to the objectives of the WFD. Oceyon notes MARAs confirmation that one site is in the boundary of Western Celtic Sea (HAs 18;19;20) – WFD code IE_SW_010_0000. This water body is classified with a baseline status of High and is categorized as not at risk. As per the assessment in the AIMU, the proposed project poses no risk to water quality as it consists of a small vessel present onsite for 1 day to conduct non intrusive survey. The survey may contribute to the objectives of the WFD in providing more information on the wreck in question and supporting future assessment of whether it may pose any risk to water quality as the wreck naturally deteriorates.

- *Provide sufficient information addressing the consistency of the proposed Maritime Usage with the objectives of the Marine Strategy Framework Directive and Ireland’s Marine Strategy under the Directive. This information should be provided as Attachment 4.6.*

Response to Request for Additional Information Item 3– Bullet 3

Section 3.2 of the AIMU Report noted that the project does not indicate that it would result in any risk or impact to the objectives of the Marine Strategy Framework Directive (MSFD) or Good Environmental Status (GES). As assessed in the AIMU, the proposed project does not pose a significant risk or impact to the objectives or the 11 descriptors of the MSFD, as it involves a small vessel being present on site for one day per site to conduct a non-intrusive survey. The project does not interact significantly with any of the MSFD descriptors. In relation to marine noise, any interaction is of extremely short duration at each site and is not considered significant, as fully assessed within the AIMU and Annex IV reports submitted with the application.

- *Provide sufficient information addressing the consistency of the proposed Maritime Usage with the Irish State's obligations under the UN Convention on the Law of the Sea and the Maritime Jurisdiction Act.*

Response to Request for Additional Information Item 3– Bullet 4

The AIMU notes that the proposed project is fully compliant with and consistent with maritime usage and international law including UNCLOS. The project has the potential to provide a net positive impact on the States obligations with regard maritime heritage, safe navigation and SOLAS Convention which require further survey and information on wrecks within Irelands waters.

- *Provide sufficient information addressing the consistency of the proposed Maritime Usage with achieving the National Climate Objective, as defined in the Climate Action and Low Carbon Act of 2015, as amended.*

Response to Request for Additional Information Item 3– Bullet 5

The proposed project is of minimum size and duration and temporary in nature. It has no significant interaction with the National Climate Objectives or Climate Action plans with the exception of the operation of a small vessel for a short duration. Any contribution to maritime carbon is so insignificant as to be undetectable and unmeasurable. The project will abide by all normal vessel operational controls such as fuel type, maintenance schedule etc in relation to the vessel proposed.

- *Provide sufficient information addressing the consistency of the proposed Maritime Usage with the 4th National Biodiversity Action Plan 2023-2030*

Response to Request for Additional Information Item 3– Bullet 6

The proposed project is of minimum size and duration and temporary in nature. The AIMU, Anex IV Species assessment and Site Specific Risk Assessment (SSRA) reports that accompany the application clearly demonstrate the project has no significant interaction with and no significant impact to marine biodiversity. The video footage recorded in relation to the wrecks maybe of use in identifying biodiversity assemblages or species associated with the wrecks in question which would provide supporting scientific net benefit in this regard.



Attachments in support of request **Item 3** are included overleaf.

ATTACHMENTS IN TO SUPPORT REQUEST ITEM 3

Attachment 4.1 – Consistency with the National Marine Planning Framework (NMPF)

Overarching objectives

The NMPF's overarching ambition is for marine activity in Ireland's maritime area to support seas that are clean, healthy, safe, productive and biologically diverse, managed to meet the long-term needs of both people and nature. The proposed survey is consistent with this ambition:

- Clean – no discharges, deposits or waste are proposed; a zero overboard-waste policy applies, with all waste secured on board and disposed of ashore through licensed facilities.
- Healthy / biologically diverse – the survey is non-invasive, involves no seabed contact and is assessed as posing no risk of injury to any protected species (Attachment 4.4); short-duration, low-level disturbance effects are actively mitigated by an MMO.
- Safe – the survey vessel operates in daylight hours only, with a Notice to Mariners issued in advance of operations at each site.
- Productive – the survey does not interfere with fishing, aquaculture, shipping or other legitimate uses of the sea, and the wreck sites surveyed are not used for these purposes.

Marine archaeology and cultural heritage

MARA has specifically requested emphasis on the interaction of the proposed Maritime Usage with underwater archaeology and cultural heritage. The NMPF states, in relation to heritage assets:

“Proposals unable to contribute to the protection of the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference, avoid, minimise, or mitigate harm to the significance of heritage assets. If it is not possible to avoid, minimise or mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets.” (NMPF, p.89).

The proposed Maritime Usage sits at the top of this preference hierarchy: it avoids harm entirely, rather than minimising or mitigating it. The survey uses only non-contact photographic and acoustic recording techniques (ROV/AUV, sonar and camera), with the ROV always maintaining

a safe standoff altitude above each wreck; no diving, physical disturbance, recovery of material, or intrusive investigation of any kind is proposed. The purpose of the survey is itself protective of heritage: to generate 3D models and condition data on each wreck that can improve understanding of its state and inform future protection and risk-assessment decisions.

Oceyon confirms that the associated dive/detection survey licence for these activities has been granted by the Department of Housing, Local Government and Heritage. On completion of the survey, Oceyon will share the resulting data and 3D models with the Wreck Unit of the Department of Housing, Local Government and Heritage, and with the relevant wreck owners, at no cost, consistent with the NMPF's emphasis on strengthening the evidence base for heritage protection.

Marine research and the blue economy

The proposed Maritime Usage falls within the 'Research' category of Schedule 7 usage (Section 1.1 of the application form). The survey supports the development and validation, in a marine (saline) environment, of Oceyon's proprietary deep-learning technology for 3D modelling of underwater structures, previously tested only in Swiss alpine lakes. This is consistent with the NMPF's support for marine scientific research, innovation and the development of Ireland's blue economy knowledge base, and the outputs – public data analysis on heritage assets – will be of benefit to the wider community, regulators and researchers.

Attachment 4.5 – Consistency with the Water Framework Directive (WFD)

The ten proposed survey sites are located off the coasts of Cork, Waterford and Wexford, at distances of approximately 2 to 25 nautical miles from the shore (see the Proposed MUL Map and GIS shapefiles, Attachments 3.4 and 3.5), in waters generally between 27 m and 110 m in depth.

MARA has advised that one survey site overlaps the WFD waterbody ‘Western Celtic Sea (HAs 18, 19, 20)’, WFD code IE_SW_010_0000. Oceyon accepts this identification and confirms that this waterbody, together with the wider offshore Celtic Sea waters in which the remaining sites are located, falls within the Zone of Influence for the purposes of this assessment.

Effect of the proposed Maritime Usage: the survey involves no discharges, deposits, dredging, or extraction of any kind, and no contact with the seabed. The only vessel-related activities are transit and station-keeping, with any refuelling undertaken at existing licensed inshore facilities, not at sea. On this basis, the proposed Maritime Usage is not assessed as having any potential to cause deterioration in the ecological or chemical status of IE_SW_010_0000, or of any other waterbody within the Zone of Influence, nor to prejudice the prospect of that waterbody achieving good status. No protected areas under the WFD (bathing waters, nutrient-sensitive areas, or areas designated for economically significant aquatic species) are identified within the Zone of Influence of the survey sites.

Conclusion: the proposed Maritime Usage is consistent with the objectives of the Water Framework Directive.

Attachment 4.6 – Consistency with the Marine Strategy Framework Directive (MSFD) and Ireland's Marine Strategy

The MSFD requires Member States to achieve or maintain Good Environmental Status (GES) in the marine environment, assessed against eleven descriptors. The Table below sets out Oceyon's assessment of the proposed Maritime Usage against each descriptor, for the Zone of Influence of the survey (the immediate vicinity of each of the ten wreck sites and the transit routes between them and the ports used).

Table 4.6: GES Descriptors

GES Descriptor	Relevance / Current Considerations	Effect of the Proposed Survey
Biological diversity	Cetaceans, seals, fish and basking sharks present in varying densities off the south coast.	No injury risk identified; short-duration, low-level disturbance only (Attachment 4.4). No significant effect.
Non-indigenous species	Standard shipping/vessel biofouling and ballast pathways.	Single vessel, standard hull husbandry; no ballast discharge planned. Negligible risk.
Commercial fish/shellfish populations	Wreck sites are not designated fishing or aquaculture grounds.	No interaction with commercial stocks; no fishing gear or extraction involved.
Marine food webs	Cetaceans and fish are part of the local food web.	No significant effect – see Descriptor 1.
Eutrophication	Not a pressure associated with survey vessels of this type.	No nutrient inputs; not applicable.
Sea floor integrity	Wrecks and surrounding seabed.	No seabed contact – ROV/AUV maintain standoff altitude; no anchoring on wrecks. No effect.

Hydrographical conditions	N/A to short-term mobile survey.	No effect.
Contaminants	N/A – no discharges.	No effect; standard refuelling at licensed inshore facilities only.
Contaminants in seafood	N/A.	No effect.
Marine litter	Standard vessel-source risk.	Zero overboard waste policy; all waste secured and disposed of ashore.
Underwater noise/energy	Key consideration for this survey – see Attachment 4.4.	No exceedance of injury criteria for any receptor; disturbance-range effects are short-duration, localised (max. 293 m for marine mammals) and actively mitigated by MMO protocol.

Underwater noise (Descriptor 11) is the only pressure with the potential to interact meaningfully with the marine environment as a result of this survey, and is addressed in detail in the Risk Assessment for Annex IV Species (Attachment 4.4) and Item 1 of this response. No exceedance of injury criteria is predicted for any receptor, and disturbance-range effects are short in duration, localised, and actively mitigated by the MMO protocol described above.

Conclusion: the proposed Maritime Usage will not compromise the achievement or maintenance of Good Environmental Status under any of the eleven MSFD descriptors, and is consistent with the objectives of the Marine Strategy Framework Directive and Ireland's Marine Strategy.

Attachment 4.8 – Consistency with the UN Convention on the Law of the Sea (UNCLOS) and the Maritime Jurisdiction Act

The proposed Maritime Usage involves the operation of a single chartered vessel, and the deployment of ROV/AUV survey equipment from that vessel, within Ireland's territorial sea and near-shore exclusive economic zone (the ten sites lie approximately 2 to 25 nautical miles from the coast). The activity does not involve dredging, cable-laying, construction, or the deposit or removal of any substance, and does not engage the freedoms of navigation or cable-laying that other States enjoy within Ireland's EEZ and continental shelf under UNCLOS.

Consistent with the Irish State's general obligation under UNCLOS to protect and preserve the marine environment, and its obligation to prevent, reduce and control pollution, the survey is designed to have no discharge, deposit or pollution pathway: no waste, fuel, chemicals or other substances will be released to the marine environment, and all vessel activity will comply with applicable Irish and international maritime safety and environmental standards (MSO P5, MCA Category 2). The vessel and equipment used are Irish/EU-sourced and operated, and the survey does not interfere with the navigational rights of other States or vessels.

Conclusion: the proposed Maritime Usage is consistent with the Irish State's obligations under UNCLOS and the Maritime Jurisdiction Act 2021.

Attachment 4.9 – Consistency with the Climate Action and Low Carbon Act 2015, as amended

The National Climate Objective, as defined in Section 3 of the Act, is the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy by no later than 2050. The proposed Maritime Usage is consistent with, and does not hinder, this objective:

- Direct emissions are minimal: a single small vessel (15.2 GT) will be used for a total survey duration of approximately 10–14 days (up to 3 weeks allowing for weather), rather than a larger vessel or fleet operating continuously.
- No infrastructure, construction or permanent occupation of the maritime area is involved, and there is no ongoing operational emissions footprint following completion of the survey.
- The survey supports the development of technology (AI/deep-learning-based 3D modelling of underwater structures) that has potential future application in lower-impact, remote condition-assessment of marine assets – including aged wrecks that may pose pollution or navigational risk – reducing the need for higher-impact intervention methods.

Conclusion: the proposed Maritime Usage is consistent with the furtherance of the National Climate Objective.

Attachment 4.10 – Consistency with Ireland's 4th National Biodiversity Action Plan (NBAP) 2023–2030

The 4th NBAP is structured around five strategic objectives. Oceyon's assessment of the proposed Maritime Usage against each is set out below, scaled proportionately to a short-duration, single-vessel, non-invasive research survey.

- **Objective 1 (Whole-of-Government, Whole-of-Society Approach):** biodiversity considerations have been integrated into the application from the outset, through the AA Screening (Attachment 4.3) and Annex IV Risk Assessment (Attachment 4.4), both prepared by suitably qualified environmental consultants.
- **Objective 2 (Meet Urgent Conservation and Restoration Needs):** the survey is temporary, non-intrusive and involves no permanent habitat loss; embedded mitigation (MMO protocol, no seabed contact) avoids disturbance to protected species and habitats, upholding existing conservation objectives.
- **Objective 3 (Secure Nature's Contribution to People):** the survey generates new data on underwater cultural heritage, connecting people with Ireland's maritime and archaeological heritage, and will be shared publicly and with the National Monuments Service.
- **Objective 4 (Enhance the Evidence Base for Action on Biodiversity):** the MMO sightings log and any incidental marine mammal data collected during the survey will be made available to MARA and NPWS following completion, contributing to the national evidence base on marine mammal distribution off the south coast.
- **Objective 5 (Strengthen Ireland's Contribution to International Biodiversity Initiatives):** the survey is conducted in a manner consistent with Ireland's obligations under the Habitats Directive and the Convention on Biological Diversity, applying internationally recognised marine mammal mitigation guidance (DAHG, 2014; Southall et al., 2007).

Consistent with the Wildlife (Amendment) Act 2023 duty to have regard to the NBAP, the mitigation measures already embedded in the survey design (MMO protocol, no seabed contact, zero overboard-waste policy, standard vessel biofouling management) directly address the pressures most relevant to the NBAP in this context: disturbance, underwater noise, and marine litter/pollution. No further mitigation is considered necessary.



Conclusion: the proposed Maritime Usage is consistent with the objectives and policies of the 4th National Biodiversity Action Plan 2023–2030.