



April 7, 2026

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RE: MUL260006 Uisce Éireann

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on MUL260006, submitted by Uisce Éireann, to conduct marine and intertidal site investigation surveys in Liscannor Bay, County Clare.

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 surveys are being evaluated.

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 significance of such food production activity is reflected in the Government's [Food Vision 2030](#) policy.

The importance of the seafood sector to our coastal communities is highlighted in BIM's [Business of Seafood 2024](#) which sets out that the total GDP of the seafood sector was €1.24 billion in 2024, and employment increased to 16,874 (direct and indirect jobs) from 15,673 in 2023.

To inform the DAFM comments, the observations of the Marine Institute (MI) on the application were requested. The MI advise that, considering the short-term nature and small spatial coverage, the proposed survey operations should not interfere with fishing activities fish ecology/biology or aquaculture. Cumulative impacts should be given consideration regarding similar activities proposed/planned to take place in close spatial and temporal proximity to the survey area.

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 the 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.

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DAFM notes that fishing activity, in particular using pots, may take place in the vicinity of the proposed site investigation surveys. Vessel Monitoring System (VMS) data regarding fishing in the area may be limited as many of the vessels in the inshore fishing segment (less than 12 metres in length) are not currently required to carry VMS equipment on board.

It is noted that the site investigation surveys shall be short-term and localised, and it is not anticipated that they will impact unduly on inshore fishers. Nevertheless, it is important that relevant local fishing organisations are included on the provision of any Notices to Mariners in this respect and made aware of proposed survey works at the earliest opportunity.

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

Yours sincerely,

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