



May 25, 2026

RE: MUL250022 Uisce Éireann, Waterford

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on MUL250022. Uisce Éireann are seeking a licence to undertake marine site investigations in the River Suir Estuary to progress a Waterford City Wastewater Treatment Plant Upgrade.

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 site investigation works 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 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) and Bord Iascaigh Mhara (BIM) on the application were requested.

The MI advise that, considering the short nature and small areas of proposed operations, they should not interfere with fishing activities or fish ecology/biology.

BIM acknowledge that an SISEIA assessed the implications of the project on the potential for effects on water quality within the receiving environment and that it concluded that no impact on the any receiving waterbody will occur. It further noted that the proposed project is required to inform the future upgrading of an existing wastewater treatment which will ultimately improve the water quality within the receiving environment. Shellfish however do bioaccumulate through filter feeding and the BIM concern would be that chemicals/metals (Waterford Framework Directive 45 Priority substances) could potentially be dispersed in fine sediments through the planned activity of borehole drilling.

BIM note that the MUL application states that grab samples will be tested for chemicals and that recommend they are tested for WFD Priority Substances before drilling and that if any levels of priority substances are very high that BIM are notified. To mitigate further any

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potential risk of bioaccumulation of WFD Priority substances BIM recommend borehole drilling be undertaken on flooding tides to lessen downstream transport of fine sediments.
BIM request to be notified immediately of any oil and chemical spills.

While the proposed activity is not anticipated to impact on inshore fishers, relevant local fishing organisations should nevertheless be engaged with at the earliest opportunity, to avoid potential disruption and displacement. The publication of a Local Notice to Mariners, through the Port of Waterford Harbour Master, should be done in a timely manner, so that relevant navigational safety information is provided to local maritime users.

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 site investigations 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.

Please also find attached documents from the MI and BIM which provide further comments for consideration.

Yours sincerely,

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