



**Iascach Iníre Éireann
Inland Fisheries Ireland**

MARINE LICENCE VETTING COMMITTEE:

MUL2500022 – Uisce Éireann application to undertake surveys to inform and design a WWTP upgrade within the River Suir Estuary

Request for observations from Ms. Paula O'Toole (MARA) dated 23/04/2026

Overview:

Uisce Éireann is applying for a maritime usage licence to undertake marine site investigations in the River Suir Estuary adjacent to the townlands of Kilmurry, Gorteens, Little Island, Ballycanvan Big and Faithlegg. Geophysical, geotechnical, bathymetric, ecological, archaeological and CCTV surveys are being proposed to gather baseline data on seabed conditions, subsurface geology, environmental receptors and the condition of an existing outfall. Information from these surveys will be used to determine the optimal route for a new marine outfall. It has been stated that all works are temporary and limited to the defined MUL location consisting of an area (71 ha) of the Suir extending upstream from the existing Waterford City WWTP outfall location at Gyles Quay (Kilkenny), south to Little Island (Waterford) and eastwards to Bellview Port beyond the confluence of the Kings Channel and River Suir. The site is located within the Lower River Suir SAC (002137) which is designated for a range of estuarine and freshwater habitats and species, including the migratory fish: twaite shad, river lamprey, sea lamprey and Atlantic salmon.

IFI Comment:

Given the latest conservation status assessments for the Annex II diadromous fish (NPWS, 2025), IFI believes that all activities should aim to reduce any impact on these species. In addition, the European eel is critically endangered and is known to inhabit both freshwater, transitional and coastal waters.

The SISAA screened in sea lamprey, river lamprey, twaite shad and salmon due to 'possible disturbance and displacement from underwater noise from bathymetry and borehole drilling.' The Lower River Suir is used as a migratory corridor by these species and IFI concurs with the NIA that the noise-generating surveys shall not be undertaken during the period of peak migratory behaviour from April to October. Outside of this period, migratory behaviour will continue for the lamprey species and it is likely that the area is used for foraging and feeding by lampreys and twaite shad. To mitigate the impact of underwater noise on both the qualifying species and their prey/host fish species, the use of soft-start and ramp-up procedures for any sound-generating works – both on a day-to-day basis and on re-start after any stoppages within any day should be undertaken. This measure is particularly important as a number of potentially noise-generating projects and plans were listed in the NIS that may temporally overlap with the proposed project



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and produce a cumulative impact. The measure should be a condition of the maritime usage licence. The comments of IFI in this regard relate to fish species of conservation significance and of leisure angling significance, all of which constitute part of IFI's brief.

Ciara O'Leary and Tara Gallagher (IFI R&D)
22/05/2026

NPWS (2025). The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report. Edited by: Domhnall Finch, Aoife Delaney, Fionnuala O'Neill and Deirdre Lynn