



Rialtas na hÉireann
Government of Ireland

Request for Further Information

DCEE Marine Usage Licence
Application 260021

2026

Prepared by the Department of
Climate, Energy and the Environment
gov.ie

1 RESPONSE TO: Request for Additional Information: Section 117(3) of the Maritime Area Planning Act 2021

Maritime Usage Licence Application Reference: MUL260021

Query 1

The Supporting Information for Screening for Appropriate Assessment (SISAA) (page 26) considers that sites designated solely for wintering waterbirds or species (e.g. Chough) without a reliance on marine habitats, are outside of the Zone of Influence of the proposed maritime usage. Figure 2 of the SISAA gives indicative borehole and grab sampling locations. Clarify whether there are any proposed borehole or other geotechnical surveys within the MUL Application Area adjacent to any Special Protection Area designated for wintering waterbirds, including the Ballycotton Bay SPA [site code: 004022], Cork Harbour SPA [site code: 004030] and Ballymacoda Bay SPA [site code: 004023]. If there will be any borehole, or other surveys in this part of the MUL Application Area, provide details on the potential for above water noise disturbance (or disturbance from vessels, platforms, lighting, increased human presence for example) expected from such surveys.

Response

Table 1 below shows the nearest distance from SPAs, designated for wintering waterbirds, to the MUL application area. Boreholes are proposed only for the individual Maritime areas within the MUL area as shown in figure 2 of the SISAA. The nearest proposed grab sampling station, as shown in figure 2 of the SISAA is 2.5km east of Ballycotton Bay SPA. We do not propose to conduct any other geotechnical surveys closer than 1km to the sites listed in table 1. We consider that this distance is too far removed from these SPAs for any potential impacts on the qualifying interests of these sites in terms of disturbance from vessels, platforms, lighting or associated human presence.

Table 1. SPA distances to MUL application area

SPA	Nearest distance (km) to MUL Area (as crow flies)
Cork Harbour SPA	1.2
Ballycotton Bay SPA	1.4
Ballymacoda Bay SPA	2.5
Blackwater Estuary SPA	>8
Dungarvan Harbour SPA	>8
Tramore Back Strand SPA	>8

Query 2

Figure 7 of the Supporting Information for Screening for Environmental Assessment report shows potential reef habitat distribution in relation to the MUL application area. The report also states that no surveys are proposed for areas indicated to be comprised of shallow sublittoral rock and biogenic reef. Clarify how impacts on reef habitats will be avoided during the survey activities.

Response

INFOMAR seabed classification shows the spatial distribution of reef habitats within the south coast DMAP. This information is publicly available at [Seabed and Sediment Data | Infomar](#). This mapping will be available on the vessel during surveys. As such, areas classified as reef habitat will be avoided during any intrusive surveys (e.g. grab sampling and borehole drilling). Only non-intrusive surveys such as drop-down camera surveys will be conducted over areas classified as reef habitat.

Query 3

Clarify length of the towed equipment referred to in both the SISAA and the Annex IV Risk Assessment. Both reports refer to a '400 m tow cable' and also to a 'total towed instrumentation length approximately 200m.

Response

The South Coast DMAP survey plans will involve deployment of towed equipment of a maximum length of 300m, but it is anticipated in 2026 that the towed equipment will be 200m maximum, or 160m in length if the same system is provided by the service provider as was deployed in 2024.

Query 4

Clarify the size (volume) of the mini-airguns proposed to be used in cubic inches (in³)

Response

A single mini-airgun was deployed in the first half of the 2024 survey of the south coast DMAP. While the Sparker is the primary operating source proposed to be deployed, the volume of single mini-airgun that may be deployed during the license term (if the sparker does not meet required specifications) is a maximum of 12 cubic inches e.g. a Mini G 12 cubic inch source with compressor and accumulators.

Query 5

Table 4 of the Annex IV Risk Assessment identifies that noise/vibration from geotechnical activities may have a potential impact on Annex IV species however this is not further discussed in the report. Provide information on the potential impact from the proposed geotechnical activities on Annex IV species.

Response

As detailed in the Annex IV risk assessment, physical disturbance from noise and vibration, as a result of geotechnical surveys, would be localised to each borehole and immediate working area (incl. drill spread/anchoring where relevant). Mechanical vibration may be transmitted into the water as sound waves, which causes radiated underwater noise.

NPWS (2014) states that *"drilling is generally acknowledged to produce moderate levels of continuous omnidirectional sound at low frequency (several tens of Hz to several thousand Hz and up to c.10 kHz). Source sound pressure levels have generally been reported to lie within the 145-190 dB re: 1 µPa range^{3,44,45}. While sound exposure levels from such operations are thought to be below that expected to cause injury to a marine mammal, they have the potential to cause lower-level disturbance, masking or behavioural impacts"*.

The impacts of vibration as a result of borehole drilling, Cone Penetration Testing and vibrocore sampling, on cetaceans are therefore quite considered to be quite low. As such it is considered that temporary behavioural disturbance and short-term habitat avoidance by Annex IV cetacean species may occur. However, mitigation by way of that provided in the NIS is recommended.

Query 6

Provide further information on the applicability of the underwater noise impact modelling study on Minke whale to the other cetacean species described in the Annex IV Risk Assessment, noting that Harbour porpoise is described as the species most sensitive to noise disturbance in UK Joint Nature Committee guidance.

Response

The noise modelling and environmental risk assessment (Thomsen *et al*, 2023) used minke whale as a proxy species for other cetaceans within the same functional hearing group. Harbour porpoise is considered to be within the High Frequency hearing group, while minke whale is within the mid-frequency group.

Table 2 of the SISAA stated that the sparker would be operating in the range of 250 Hz – 1.75 kHz with a sound pressure Level (dB re 1 μ Pa @ 1 m) of 223 and the mini airgun would be operating at a level of < 250 Hz and 230 dB re 1 μ Pa @ 1 m.

It is therefore recognised that the modelling for Minke whale may not be directly applicable to Harbour porpoise in all operational circumstances. JNCC guidelines¹ recommends an Effective Deterrence Range (EDR) of 5km is applied to survey lines for mini-airgun relative to Harbour porpoise. The proposed recommendations given in section 6.1 of the NIS relative to apply.

Query 7

Section 6.4 of the Natura Impact Statement refers to mitigation to avoid the potential for likely significant in-combination effects on marine mammals and birds, as follows:

‘However, it is recommended that elements of the proposed project, that result in introduction of underwater noise into the marine environment, should not occur simultaneously with any underwater noise inducing element of the additional projects listed in Table 3, should they also be in receipt of a MUL or MAC’.

Provide details as to how this measure will be implemented in practice. Provide details on which ‘elements’ of the proposed site investigation activities this measure is referring to and the scientific reasoning for including those particular elements.

Response

Over the last 12 months we have had ongoing meetings, with regard to joint simultaneous operations (SIMOPS), with ESB and EirGrid. This liaison will continue to ensure any temporal overlap between projects is avoided to ensure compliance with the licencing conditions of all three organisations. The project team propose to plan surveys so that underwater noise inducing activities are maintained outside the required distance to avoid temporal overlap. We have been advised that ESB and Eirgrid will be conducting work within the Tonn Nua site and shore landing routes respectively. These areas represents a small section within the overall MUL application area sought. As such there is sufficient scope to conduct surveys so no temporal overlap occurs.

Should any additional projects, with the potential to lead to any underwater noise inducing effects, be consented, these will be addressed in the same manner to avoid temporal overlap relative to underwater noise.

This measure relates to geophysical survey operations, which have been identified as having the potential to introduce underwater noise into the receiving environment with the potential to lead to Likely Significant Effects (LSE's) to marine mammals and birds. While geotechnical operations may also introduce underwater noise into the receiving environment, the levels produced are not considered to cause LSE's to marine mammals or birds.

¹ JNCC (2023). Marine Noise Registry Disturbance Tool: Description and output generation.