



May 22, 2026

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**RE: MUL260021 Department of Climate, Energy and the Environment (DCEE)**

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on MUL260005, submitted by Department of Climate, Energy and the Environment (DCEE), to conduct geophysical, geotechnical, metocean and biological surveys in the South Coast DMAP to inform future offshore renewable energy development

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 importance of these primary and secondary food production activities 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) and Bord Iascaigh Mhara (BIM) on the application were requested. BIM note that there are licensed oyster farms in Ballymacoda Bay which are adjacent to the boundary of the proposed MUL area. <https://dafm-maps.marine.ie/aquaculture-viewer/>. BIM request to be notified if any oil or chemical spills occur during the works.

BIM note that there is widespread commercial fishing activity within the geographical area on the 'Proposed MUL Map'. VMS data will clearly show the activity of the larger offshore fishing fleet, which includes scallop dredging, whitefish trawling and for pelagic fishing activity such as herring. BIM highlight an additional concern regarding the 'displacement' impact of fishing activities moving to the coastal inshore region.

MI advise that the degree of potential impacts to fisheries and fishery resources relates to timing of survey operations and the equipment used. The timing of the surveys will be crucial

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to minimise impacts of displacement of fisheries. Survey plans and engagement with relevant fishing organisations, DAFM and its marine agencies is required to ensure sufficient engagement in respect of the timing of surveys to, as far as possible, minimise impact on fishing activity.

Geotechnical operations, specifically cone penetration test and boreholes works are highlighted by MI, as causing potential negative effects on benthic crustaceans (Crab and Lobster) and subsequently reduced catch rates and this must be taken into consideration.

As per observations made for LIC24006, MI reiterate that where feasible, the use of the “sparker” instead of the airgun is recommended, along with the application of additional mitigation measures during survey activities (bubble curtains). Ongoing engagement with the relevant fishing organisations is required to ensure sufficient engagement.

DAFM recognises that the applicant’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).

DAFM note that a variety of fishing activities take place adjacent to the proposed development site, including pot fishing (for lobster, crab, shrimp and whelk), net/trawl, line and some dredge fisheries in the inshore area of the Wexford and Waterford coastline. A challenge for the inshore fleet is that vessels under 12 metres are mostly not required to carry Vessel Monitoring Systems (VMS). This means their activities are less visible in official data, and the true scale and patterns of inshore fishing are not fully captured. This data gap makes it essential to engage directly with local fishing representatives and use participatory mapping to recognise and mitigate impacts.

The displacement of the inshore fleet is a concern in the context of the proposed activities. Potential impacts include increased steaming times to fishing grounds, potential restrictions on key fishing grounds, heightened fishing pressure on adjacent shellfish resources, gear conflicts, and economic effects on operators. The sensitivity of individual operators to displacement should be fully acknowledged.

Where impacts cannot be avoided, activities must be minimised and mitigated as far as possible. The Department welcomes that survey operations will be managed to reduce disruption, and mitigation such as advance notification to mariners and engagement with local stakeholders through a Fisheries Liaison Officer is set out to ensure activities are communicated clearly. It is recommended that survey timing and methods be selected to minimise cumulative disturbances, with ongoing engagement throughout the project activities.



DAFM recognises that DCEE fully appreciate their obligations under marine planning law and policy, having led on the formulation of these, and DAFM are fully confident these principles in the NMPF of avoiding, minimising, or mitigating impacts on access to existing activities (including specific policies on Fisheries and Aquaculture) will be strictly adhered to.

It is acknowledged that Fishery Liaison Services support ongoing engagement with coastal communities, fishers and representative organisations in relation to the SC-DMAP. DAFM would urge that early and ongoing consultation with the fishing industry continues to ensure minimum impacts on the seafood industry.

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*