



May 25, 2026

**RE: MUL260007 Uisce Éireann, Castletown Estuary, Co. Louth**

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on MUL260007. Uisce Éireann are seeking a licence to deliver subtidal and intertidal marine ecology surveys for the Dundalk WWTP Capacity Upgrade Project.

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.

To inform the DAFM comments, the observations of the Marine Institute (MI) 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.

A variety of fishing activities take place adjacent to the proposed site investigations, including dredge fishing for razor clam and cockle. While vessels fishing those stocks are required to carry Vessel Monitoring Systems (VMS), there may be a lack of data concerning other fishing activities in, and around, the licence application area as many of the vessels in the inshore fishing segment are not currently required to carry VMS on board.

Given the scale and temporary nature of the proposed site investigations, however, they are not anticipated to impact unduly on inshore fishers. Relevant local fishing organisations, including the North-East Regional Inshore Fisheries Forum (NERIFF), should nevertheless be engaged with at the earliest opportunity, to avoid any potential disruption.

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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 document from the MI which provide further comments for consideration.

Yours sincerely,

**Marine Divisions**

**An Roinn Talmhaíochta, Bia agus Mara**

*Department of Agriculture, Food and the Marine*