



May 29, 2026

licence@mara.gov.ie

RE: MUL260022 - Fingal County Council

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on MUL260022, submitted by Fingal County Council to perform maintenance dredging in Balbriggan Harbour Basin.

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 dredging is 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 note that the dredging to a depth of -1.5m ODM is proposed for the harbour basin to maintain accessibility for fishing vessels. Considering the short nature and small areas of proposed operations, they should not interfere with fishing activities (save for potentially limited access to the harbour for vessels), assuming any necessary Marine Notices are made, or fish ecology/biology.

BIM note that the proposed maintenance dredging at Balbriggan Harbour is a necessary and broadly supported measure. However, the supporting documentation does not mention the fisheries activity of razor classification areas and the potential impact the dredging might have on the economically important razor fishery, which is a significant proportion of landing to the Balbriggan Harbour. Although the overall risk of dredging-related contamination affecting the surrounding areas is considered low, the sensitivity of these species and the regulatory framework governing classified production areas make it appropriate to maintain standard precautionary measures. These include turbidity monitoring, defined stop-work thresholds, and clear communication protocols should unexpectedly changes in water quality occur.

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

Government Buildings, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85 TX47

T +353 (0)23 8859500

gov.ie - Department of Agriculture, Food and the Marine (www.gov.ie)



Balbriggan Harbour is significant in respect of commercial sea-fishing activities, with the razor clam fishery representing an important share of local landings and economic activity. Any maintenance dredging project should carefully consider the potential impacts on all sea-fishing activities throughout planning and execution. Razor clam fishing vessels are subject to legal requirements in respect of Vessel Monitoring Systems (VMS), which may support effective coordination during harbour operations. For other inshore vessels under 12 metres that do not target razor clam, VMS is generally not required, and their activities are not routinely captured in official datasets.

Early and ongoing engagement with local fishers is recommended to ensure their activities are considered in project planning. A liaison officer or contact point should be available so inshore fishers can communicate any concerns and receive timely updates during the planned dredging campaign. Organisations such as the North East Regional Inshore Fisheries Forum (NE RIFF): <https://inshoreforums.ie/north-east> should be included in project communications, Notices to Mariners, and invited to relevant stakeholder meetings. Dredging operations should be scheduled to avoid peak fishing activity windows - from approximately three hours before high tide to one hour after - as recommended by Bord Iascaigh Mhara, to minimise disruption to the inshore fleet and local fisheries.

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 dredging 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.

All relevant fishing organisations should receive any applicable Marine Notices, and be made aware of any proposed works, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible.

Please also find attached document(s) 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