



**Iascach Intíre Éireann
Inland Fisheries Ireland**

MARINE LICENCE VETTING COMMITTEE:

MUL260007 – Dundalk WWTP Capacity Upgrade Project

Request for observations from Ms. Leeanne Doyle (MARA) dated 23/04/2026

Overview:

Uisce Éireann (UE) wishes to undertake capacity upgrade of the Dundalk wastewater treatment plant (WWTP). The initial planning and feasibility phase of the project will require subtidal and intertidal marine ecology surveys at Soldiers Point in Castletown Estuary, Co. Louth, to provide baseline data to inform an Environmental Impact Assessment Report (EIAR). To this end, UE, in conjunction with AQUAFAC International Services Ltd., have formally applied to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence (MUL) to undertake these surveys. It is anticipated that surveying will be straightforward, highly localised, non-destructive and minimally impacting upon the foreshore, seabed and marine environment, requiring a single week to complete. The area of the proposed MUL is 90 hectares.

IFI Comment:

The MUL application along with the various supporting documents were reviewed by IFI. The applicant provided details and locations of the proposed marine survey exercise and intertidal survey transects. The application outlined in detail how the proposed MUL is consistent with the objectives of relevant marine planning and environmental legislation such as the National Marine Planning Framework (NMPF), Habitats and Birds Directives, Water Framework Directive (WFD), Marine Strategy Framework Directive (MSFD), Environmental Impact Assessment (EIA) Directive, UN Convention on the Law of the Sea (UNCLOS) and the Maritime Jurisdiction Act, the Climate Action and Low Carbon Development Act, the 4th National Biodiversity Action Plan 2023–2030, as well as several National and European strategic or policy objectives. Also provided were a risk assessment for Annex IV Habitats Directive (HD) species and an appropriate assessment (AA) screening and determination report. This latter document concluded the survey works would have no significant effects on protected habitats, species or European sites in general, thereby precluding any requirement for an EIA or further EIA screening.

Inland Fisheries Ireland (IFI) is satisfied with the documentation submitted and the assessments provided. The Dundalk WWTP upgrade project will undoubtedly relieve pressure on the receiving waters and provide numerous environmental, societal and economic benefits which will extend beyond Dundalk Bay and into the Irish Sea.



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IFI also wishes to draw attention to several migratory and highly mobile fish species which are qualifying interests in SACs adjacent to the Irish Sea, including Atlantic salmon (*Salmo salar*), twaite shad (*Alosa fallax*), sea lamprey (*Petromyzon marinus*) and river lamprey (*Lampetra fluviatilis*) as well as elasmobranchs, European eel (*Anguilla anguilla*) and sea trout (*Salmo trutta*). For many of these species, their migration pathways or use of adjacent coastal waters to forage may bring them into contact with the proposed MUL area. To this end, IFI suggests potential mitigation measures for these various species which should include.

- Agreed timing of works so as not to interfere with migration times of pertinent fish life stages.
- Short sampling window to mitigate any possible or unforeseen long-term effects.

These measures should be a condition of the Maritime Usage Licence.

Dr. Sean Rooney and Dr. Ciara O'Leary (IFI Research)
22/05/2026