

## **MUL260021 - South Coast DMAP**

### **Proposed activity:**

MARA application MUL260021, submitted by Department of Climate Energy and Environment (DCEE), to undertake geophysical, geotechnical, metocean and biological surveys to inform future offshore renewable energy development in the South Coast DMAP

### **BIM Comments**

**08.05.26**

#### **Aquaculture**

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/>

It would depend on the scale of sediment disturbance at this location as to whether sediment would be transported in on top of oyster sites in Ballymacoda Bay. Also, it would be recommended that any works using seismic shocks that are to take place close to Ballymacoda Bay would be done at low water as this is when oysters in Ballymacoda Bay are exposed to air. For all other aquaculture sites in the region the proposed MUL area is too far away to have any impact on these sites.

BIM would ask that if any oil or chemical spills occur during works that BIM are informed of the nature of the spill and associated details (time location etc).

#### **Fisheries**

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.

Known spawning area and migratory routes of key stocks/species are also well mapped by the Marine Institute. <https://atlas.marine.ie/?page=Marine-Atlas&views=Map-Layers>

The inshore commercial fishing activity has been successfully mapped within the BIM Wexford and Waterford participatory mapping study with the recently updated report. The attached report presents and describes fleet-wide fishing activity of < 12 m vessels within the area, and the aggregated spatial data can be accessed at this [link](#), and the report is on BIM's webpage at this [link](#).

This shows widespread fishing by pots for mainly lobster, crab and shrimp and some for whelk but also net/trawl, line and some dredge fisheries in the inshore area of the Wexford and Waterford coastline.

There is likely to be widespread disturbance to the commercial fishing activity within the Mul area from the proposed surveys. However, additional concern should also be expressed concerning the 'displacement' impact of fishing activity being moved to the coastal inshore region that is inside of the Mul area map. Already this displacement issue has been reported to have occurred in 2025 during the Eirgrid surveys for the substation site surveys. It appears that pot fishermen that did not have gear directly within the survey area, were not initially consulted with, despite the fact that gear fished by fishermen directly impacted by the surveys (who were consulted with and compensated) was moved in on top of their fishing areas, causing a drop in their landings and incomes. This displacement situation needs to be addressed with this project.

Having read the Marine Institute (MI) comments (29.05.2024), BIM would agree with the need stated that 'the site investigation (SI) surveys should overlap with fisheries studies to gather empirical evidence on impacts on fisheries catch rates' and that every effort should be made to co-ordinate and minimize disturbance to fisheries by both the required studies of this project and those being undertaken by the MI, and any other body that is applying to MARA to do survey work.

BIM would also strongly agree with the MI comment (29.05.2024), that 'MARA consider the likely longer-term effects on commercial and non-commercial fish and shellfish species, other biota and the broader marine ecosystem, if any, and how this effect might be measured.' Fishers have always expressed concern regarding the potential impacts on commercial fish species of the survey methods (in particular seismic) to be undertaken in the site investigations that are also highlighted by the MI comments, which comments on the fact that the various impact studies do not quantify potential impacts on commercial fish species, but instead on listed species. Therefore, before during and after catch rate data on key commercial fish species should be included.

Full consultation with the fishing industry likely to be impacted including adequate warning of the timing and exact location of the survey phases is essential, through direct contact using the Irish Fleet Register [Sea-Fishing Boat Licence Applications, Forms and Conditions](#). Additional, usual channels of communication, such as Marine Notices, the Producer Organisations such as the IS&EFPO, IIMRO, NIFA, local RIFF, all the relevant harbour port offices and local authority offices, and local media including Marine Times where possible covering the impacted area.