



MERC Consultants
environmental and conservation services

Statement of Compliance with the Water Framework Directive

Applicant: Department of Climate, Energy and the Environment (DCEE)

MUL application for: South Coast Designated Maritime Area Plan (SCDMAP) Geophysical reconnaissance, metocean, geotechnical, benthic and passive acoustic surveys.

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The key objectives of the Water Framework Directive (Directive, 2000/60/EC) are set out in Article 4 of the Directive. It requires Member States to use their River Basin Management Plans and Programmes of Measures to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration. Thereby ensuring good qualitative and quantitative health, i.e. on reducing and removing pollution and ensuring that there is enough water to support wildlife at the same time as human needs. The WFD objectives are implemented in Ireland through the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009, as amended, e.g., 327/2012, 77/2019, 659/2021, 410/2023).

Transitional Waterbodies

The MUL area does not overlap with any transitional water body and no transitional water bodies lie within the Zone of Influence (Zol) of the proposed project.

Coastal waterbodies

The MUL area overlaps with the following coastal water bodies. There are no additional coastal waterbodies within the Zol of the proposed project.

- Eastern Celtic Sea (HAs 13;17)
- Western Celtic Sea (HAs 18;19;20)
- Outer Cork Harbour
- Ballycotton Bay

Protected areas

A number of protected areas lie within the Zol of the MUL area. The potential for impact on all of these protected areas was examined in the Supporting Information for Screening for Appropriate Assessment (MERC, 2026a) and/or the Supporting Information for Screening for Environmental Impact Assessment (MERC, 2026b) prepared for the MUL application. No potential for impact on the ecological status of any waterbody within any protected area as a result of the proposed project was identified.

The current ecological status of the coastal waterbodies within the ZOI is given in table 1.

Table 1. Current ecological status

Waterbody	Current (2019-2024) Ecological status	Hydromorphological Conditions (2021-2024)	WFD Risk
Eastern Celtic Sea	High	High. (No significant hydromorphological alterations identified at waterbody scale)	Not at Risk
Western Celtic Sea	High	High* (Minimally impacted; no significant hydromorphological pressures identified)	Not at Risk
Outer Cork Harbour	Good	Moderate (Localised hydromorphological modification from anthropogenic pressures)	Under Review (Anthropogenic pressures)
Ballycotton Bay	Good	High (Natural coastal processes dominant; limited hydromorphological pressure)	Not at Risk

* A further ecological sensitivity analysis is being completed for the Celtic Sea to align with the proposed South Coast Offshore Renewable Energy DMAP. This will ensure that protection of the marine environment is considered concurrently with the development of offshore renewables.

Under the EU Water Framework Directive (WFD, 2000/60/EC), “Good Ecological Status” (GES) is assessed using a combination of biological, hydromorphological, and physico-chemical quality elements. These are compared against “reference conditions” (near-natural, undisturbed state) for each water body type. Good surface water status means the status achieved by a surface water body when both its ecological status and its chemical status are at least “good”.

Supporting Information for Screening for Appropriate Assessment (SISAA) and Supporting Information for Screening for Environmental Impact Assessment (SISEIA) documents have been prepared to support this MUL application. These reports examined project related pressures and their potential to impact a range of environmental variables, including water quality. Neither report identified any potential for impacts on water quality that might effect the existing Ecological status of any waterbody

The key elements used to assess GES are listed in table 2 and a summary assessment of the potential for project related pressures to lead to an alteration to their baseline condition is provided. Further detail on the identification of pressures with the potential to affect the water quality elements and their likely impacts is given in MERC 2026a and MERC, 2026b.

Table 2: Indicators of Good Ecological status

Category	Quality Element / Indicator	Metrics considered	Assessment
Biological	Phytoplankton	Phytoplankton biomass abundance, species composition, frequency of blooms.	Site investigation only. No element of the proposed project has the potential to alter the baseline metrics of phytoplankton.
Biological	Macrophytes & Phytobenthos	Species composition, coverage, diversity, sensitivity to disturbance	Site investigation only. No element of the proposed project has the potential to alter the baseline metrics of macrophytes & phytobenthos.
Biological	Benthic Invertebrates	No element of the proposed project has the potential to alter the baseline metrics of Diversity, abundance, pollution sensitivity, community structure	SISAA examined potential for impact on benthic habitats. None recorded.
Biological	Fish Fauna	Species composition, abundance, age structure, migration patterns	SISAA and SISEIA examined potential for impact on commercial and Annex IV fish. No potential for impact recorded
Hydromorphological	Hydrological Regime	Flow quantity and dynamics, water level fluctuations, groundwater connection	Offshore site investigations project with no potential to alter baseline condition of hydrological regime.
Hydromorphological	River Continuity	Barriers to movement (weirs, dams), fish passage	No barriers to fish passage proposed
Hydromorphological	Morphological Conditions	Channel structure, substrate composition, riparian zone condition, bank/shore structure	Offshore project with no potential to alter baseline condition
Physico-chemical	General Conditions	Temperature, dissolved oxygen, pH, salinity	Site investigation only, no potential to change general conditions.
Physico-chemical	Nutrients	Nitrogen (nitrate, ammonia), phosphorus (phosphate)	Site investigation only, no nutrients discharged to sea.
Physico-chemical	Specific Pollutants	Metals, pesticides, and other nationally identified substances (EQS compliance)	Site investigation only, no introduction of pollutants possible. MARPOL compliant vessels.
Chemical (Separate Status)	Priority Substances	Mercury, cadmium, PFAS, PAHs and other EU priority chemicals (pass/fail)	Site investigation only, no dumping at sea or introduction of priority substances possible. MARPOL compliant vessels: standard pollution prevention and spill response measures implemented

Conclusion

The project as proposed does not have the potential to effect the existing baseline Ecological quality status of any waterbody, and is therefore, compliant with the objectives of the Water Framework Directive.

Statement of Authority

This assessment of compliance with the Water Framework Directive was prepared by Dr. Louise Scally (MCIEEM) and Dr Ronan Browne of MERC. **Louise Scally MCIEEM** is a professional marine ecologist with a wide range of experience in the field of conservation biology, marine habitat mapping and ecology. She completed a M.Sc. in ecology and taxonomy at Trinity College Dublin in 1989 and a Ph.D. in taxonomy, also at Trinity College Dublin, in 2001. She is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). For the last 20 years she has specialised in the ecology of marine ecosystems. She has specialised in the assessment of benthic habitats with a focus on intertidal and subtidal reef habitats and sensitive seabed species and habitats. Over the last 15 years she has conducted extensive marine monitoring surveys and assessments of EU Habitats Directive marine Annex I habitats and their associated species within European sites in Ireland to inform national compliance obligations under the EU Habitats Directive. **Ronan Browne** is a marine and environmental scientist with extensive experience in coastal ecology, WFD water-quality monitoring, and the assessment of intertidal and subtidal habitats. He holds qualifications in aquatic biology, shellfish biology, and fisheries (MSc, Bangor), and in fisheries science (PhD, University of Galway). He has worked across national marine monitoring programmes and applied research with organisations including BIM, the Marine Institute, CLS and MERC.

References

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