MUL260034 Wexford County Council

Proposed activity:

Wexford County Council (WCC) propose to conduct marine site Investigations and associated environmental surveys that are required to inform the design of the Rosslare Coastal Erosion and Flood Relief Scheme.

BIM Comments: **10.06.26**

On page 10 of the Mul Application document under '3.3 Duration' about 3 weeks is stated as being needed to do the surveys and the 3rd quarter of 2026 is mentioned as a commencement timeframe. But this depends on when the MUL is granted. In the Supporting Information for Screening for Environmental Impact Assessment document however, period of up to 6 months are listed for some survey methods. In the NIS document permission under the MUL is being sought to give them permission of a 3 year time window to allow for delays in the application being granted.

Page 9 of the application document summarises the survey techniques, which list a number which are typically of concern to fishermen as highlighted below.

Summary of fishing effort over lapping with the application area.

There are two main inshore fisheries over lapping with the application area, along with some minor overlap of larger offshore vessel activity.

1. Razor clam dredging by inshore boats
2. Pot and net fishing for crustaceans
3. Pelagic and whitefish trawling (otter and beam)

1. Razor Fishery

Four boats currently fish razors in the production area. Included within this is one family run business that not only owns a number of the fishing boats but also has substantial additional employment on shore of over 20 employees as they pack/process and export the razors they land. The razor fishery production area classified by the SFPA is shown below alongside the area being applied for under this application, with a substantial overlap (Figure 1 and 2). On the right had side is shown the area fished by dredges compared with the application area, taken from the SISEIA report provided by the applicant (from data sourced from the Marine Institute) (Figure 3.). This shows that the razor fishing overlaps the application area on the outer/eastern boundary, and slightly on the northern boundary. However, those involved in razor fishing firstly state that the actual area fished extends somewhat more eastward than the area shown on the SISEA dredges map below. More importantly however, they make the point that the unfished area within the application area is heavily populated with juvenile razors that recruit to the commercial fishery on the outer areas shown. They have serious concerns of the impact that the survey techniques will have on the juvenile stocks within the

application/survey area, and directly also on the area that they fish, not just within the overlapping application area, but also on key areas just outside of it.

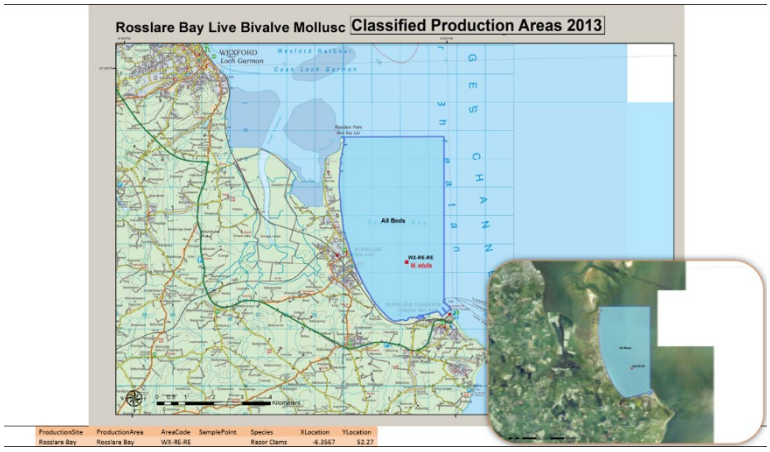

Figure 1. SFPA Classified production area

Figure 2. Area applied for by Wexford Co. Council

Figure 3. Area fished by Dredges (for razor clams) from SISEIA report

2. Pot and net fishing for crustaceans

Approximately 11 inshore fishing boats fish the area applied for. The SISSEA document shows only a small area overlap with the southeast of the application area (see Figure 4).

Figure 4. *Area fished by Pots from SISEIA report*

This is disputed by the fishermen who state that the area that they fish within the application is more extensive, and the document does not include net fishing for spider crab, that takes place within the area.

For approx. 5 fishermen the area being applied for surveys by Wexford Co. Council, would represent a substantial portion of the area that they fish overall (at least 80% of their total fishing area). These are in many cases smaller inshore boats (punts) that are limited to how far they can fish from their homeport of Rosslare cot safe and harbour.

The key fishery for these boats is spider crab fishing by way of both nets and pots from April to the end of August. However, pot fishing for velvet crab, some brown crab and lobster also takes place all year round for some fishermen.

3. Pelagic and whitefish trawling (otter and beam trawls)
This is identified within the SISEIA document and is shown to have minimal overlap (eastern and southeastern edges) with the application area.

Key Concerns expressed by fishermen
The SISEIA states the following regarding commercial fisheries

5.2.2.5 *Fish*

Commercial fisheries

There is potential overlap between the MUL area and commercial fisheries activities including dredges, pots, bottom otter trawls, pelagic trawls and beam trawls (Figure 5.3). However, as the overlap is limited to the outer boundary of the MUL area and due to the limited duration of the works, the impact on commercial fisheries is anticipated to be negligible. Furthermore, any SSC is likely to be limited in extent and of limited duration, with dispersion resulting in reduced SSC concentrations in the surrounding area. This is also therefore unlikely to impact the commercial fisheries activities.

The above findings are disputed by fishermen that I have been in touch with.

a) *Disruption and displacement of fishing effort during the surveys*
As the application area overlaps substantially with the fishing effort of a large number of inshore potting and netting boats, fishermen will need to move their gear and effort. It is not clear from the documentation if the fishermen have to

cease fishing or can the surveys work around fishing activity. This needs to be clarified to fully identify the true impacts. For some fishermen there is likely to have a larger impact than others due to the size of their boats, that are restricted to fishing closer to the shore within this area as it is close to their homeport. There is likely also to be knock on displacement of effort on top of other fishermen in other areas during the survey period(s). The extend of the overlap with the razor dredge fishery is discussed above, regarding the comparison to the SISEIA Dredges map with the classified production area and the application area.

b) *Impact on catch rates*
Concern is expressed by fishermen of the potential short and longer term impacts of some of the survey techniques such as 'Marine refraction seismic, Boreholes, Cone Penetration Tests (CPTs), SBP – boomer, SBP - sparker' etc. from examples where they saw a drop in catches from similar survey methods that took a considerable period to recover. In addition to the impact on direct immediate commercial catch rates, is also the feared impact on future catch rates by the impact of the surveys on juvenile species that recruit to the commercial fisheries (e.g. razors).

Key considerations
It would be vital that consultation takes place directly with all fishermen well in advance on the timing of the surveys to minimise impact with the highest concentration/period of their fishing activity. Clarity on the commencement and duration of the surveys is required, and whether fishing is required to cease during the surveys and to what extent etc.

From the perspective of the fishermen, they would ask that the overall impacts of the surveys are monitored in relation to the impact on their catch rates and resulting landings/incomes. This would involve studying landings/catch rates from the area before, during and after the surveys. This impact should also include for the impact on key juvenile species that recruit to the commercial fisheries (such as the example of juvenile razors that occur throughout the survey area being applied for).