



June 17, 2026

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RE: MUL260034 Wexford County Council

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments Wexford County Council's application for a licence to conduct marine site investigations and environmental surveys to inform the design of the Rosslare Coastal Erosion and Flood Relief Scheme.

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 surveys are 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), Bord Iascaigh Mhara (BIM) and the Sea Fisheries Protection Authority (SFPA) on the application were requested.

The MI advised that in consideration of 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.

BIM have highlighted the fishing effort that takes place within the application area. This includes overlap with two main inshore fisheries (razor clam dredging and pot and net fishing), and some minor overlap of larger offshore pelagic and whitefish trawling activity.

BIM advise 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.

The SFPA also agreed there was overlap between the survey areas and other wild shellfish fisheries located in and immediately adjacent to this survey area and not identified as part of the screening documentation. They also advise that, while the screening documentation does mention that survey works should have a negligible impact on shellfish aquaculture, the issue

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of low water flow rates at survey site A is not addressed, which could potentially result in increased morbidity of shellfish farmed there.

The SFPA also state that, the surveying techniques outlined in the application pose a negligible risk to seafood safety, once adhered to. They do point out that any hinderance in access to the relevant aquaculture sites for control during survey periods may negatively impact on the commercial value of product within the bay.

Commercial sea-fishing is a long-standing, pre-existing and traditional activity in the marine environment. A variety of fishing activities take place adjacent to the areas set out in the MUL application, including dredge fishing for mussel seed and razor clam, and pot fishing. Rosslare Harbour is important for landings of key species such as whelk, scallop, razor clam, lobster, and crab. The inshore fishing fleet account for the majority of these landings. Most of these vessels use static gear and operate as day boats close to their home port, making uninterrupted access to the port essential for their economic viability, and the sustainability of local fishing communities.

A challenge for the inshore fleet is that vessels under 12 metres are mostly not required to carry Vessel Monitoring Systems (VMS). This means their activities are less visible in official data, and the true scale and patterns of inshore fishing are not fully captured. In this instance we wish to draw your attention to the observations provided by Bord Iascaigh Mhara (BIM) in relation to concerns raised by local fishers including, disruption, displacement, impacts of survey work on catch rates and on juvenile razor clams.

DAFM acknowledges that appropriate notices will be provided to ensure marine users are aware of the operations and deployments during the proposed survey works to avoid disruption to marine traffic. Organisations representing inshore vessels which should be engaged/consulted with include:

- The National Inshore Fisheries Forum (NIFF): <https://inshoreforums.ie/niff/>
- The South East Regional Inshore Fisheries Forum (SE RIFF):
<https://inshoreforums.ie/south-east-overview/>
- The National Inshore Fishermen's Association (NIFA): <https://inshore.ie/>

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 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 documents from the MI, the SFPA 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