



**Co-funded by
the European Union**

The contents of this report are the sole responsibility of Wexford County Council and does not necessarily reflect on the opinion of the European Union

N11/N25 Oilgate to Rosslare Harbour Scheme River Slaney MUL Application

**Attachment 4.6 - Compliance with Marine
Strategy Framework Directive**

June 2026

This page left intentionally blank for pagination.

Mott MacDonald
South Block
Rockfield
Dundrum
Dublin 16
D16 R6V0
Ireland

T +353 (0)1 2916 700
mottmac.com

Wexford County Council,
Roads Department,
Wexford County Council,
Carricklawn,
Wexford Town.
Y35 WY93

Tel: (053) 9196000

N11/N25 Oilgate to Rosslare Harbour Scheme River Slaney MUL Application

Attachment 4.6 - Compliance with Marine Strategy Framework Directive

June 2026

Directors: B Williams BE (Hons) MEngSc
CEng FIEI FConsEI (Managing), R
Jefferson MSCSI MRICS BSc Dip Con
Law, T Keane BE (Hons) CEng MIET, D
Kelly BEng (Hons) CEng FIEI, J H K
Harris BSc CEng (British), C H Travers
MEng CEng (British), R Risdon, E G Roud
FCA MA (Hons) Economics (British)
Innealtóirí Comhairleach (Consulting
Engineers)
Company Secretary: S O'Donovan BBS
(Hons), CTA, FCCA
Registered in Ireland no. 53280.
Mott MacDonald Ireland Limited is a
member of the Mott MacDonald Group

Mott MacDonald Public

Issue and Revision Record

Document reference: 229100548-MMD-0000-XX-RP-C-0069-P2

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

Contents

1	Introduction	1
1.1	Statement of Authority	1
2	Marine Strategy Framework Directive and Ireland's MSFD Marine Strategy	2
3	Conclusion	7

Tables

Table 2.1: Current Status of MSFD Descriptors and Consistency of Proposed Surveys with MSFD and Descriptor Targets	3
--	---

1 Introduction

Mott MacDonald Ireland Limited, on behalf of Wexford County Council (WCC) ('the Applicant'), are submitting a Maritime Usage Licence (MUL) application for site investigation surveys at the River Slaney, northwest of Wexford town. The MUL is being sought solely to facilitate site investigation surveys associated with the proposed N11/N25 Oilgate to Rosslare Harbour Scheme ('the proposed scheme').

This report refers to Attachment 3.1 Description of the Proposed Maritime Usage in relation to the description of the surveys proposed.

This report sets out how the proposed surveys are consistent with the objectives of the Marine Strategy Framework Directive (MSFD) and Ireland's Marine Strategy under the Directive, in line with Question 4.6 of the Maritime Usage Licence (MUL) General Application Form (MUL1).

The Marine Strategy Framework Directive 2008/56/EC, adopted in 2008, aims to achieve Good Environment Status (GES) for all marine waters in Europe and protect the resource base for marine related economic and social activities. The State's obligations under the MSFD are transposed into national law through the European Communities (Marine Strategy Framework) Regulations 2011 (S.I. No. 249/2011).¹ These Regulations were amended by European Communities (Marine Strategy Framework) (Amendment) Regulations 2025 (S.I. No. 362/2025).²

Ireland's 2024 MSFD Marine Strategy Part 1³ contains the most comprehensive and up to date assessment of the status of Ireland's marine environment, the characteristics of what GES should look like, and a revised set of environmental targets for each of the 11 qualitative descriptors of the Directive.

1.1 Statement of Authority

Aastha Sethi: Senior Environmental Scientist, Mott MacDonald. Aastha is an environmental specialist with over six years' experience in preparation and coordination of Environmental Impact Assessment Reports, non-statutory environmental and planning reports and feasibility studies for large scale infrastructure projects in Ireland. Proven understanding of Irish and EU environmental and planning legislation and policies.

Dr Diane Jone: Senior Associate Marine Environment, Mott MacDonald. Diane is an experienced marine and estuarine ecologist with over 23 years' practical experience in environmental consultancy in the ports and harbours, dredging, offshore renewables, deep sea mining and energy sectors. A proven ability to provide relevant advice regarding impacts, mitigation and monitoring for a range of projects, including site selection for new developments, dredging activities, habitat restoration and creation and licensing.

¹ European Communities (Marine Strategy Framework) Regulations 2011 (S.I. No. 249/2011)

² European Communities (Marine Strategy Framework) (Amendment) Regulations 2025 (S.I. No. 362/2025)

³ Ireland's Marine Strategy Part 1: Article 8, 9 and 10 Report (Annex IV) (Department of Housing, Local Government and Heritage, 2024)

2 Marine Strategy Framework Directive and Ireland's MSFD Marine Strategy

The MSFD defines Good Environment Status (GES) through 11 qualitative descriptors:

1. Biodiversity is maintained
2. Non-indigenous species do not adversely alter ecosystems
3. Populations of commercial fish and shellfish species are healthy
4. Food webs ensure long-term abundance and reproduction of species
5. Eutrophication is reduced
6. Sea floor integrity ensures the proper functioning of ecosystems
7. Permanent alteration of hydrographical conditions does not adversely affect ecosystems
8. Concentrations of contaminants give no pollution effects
9. Contaminants in seafood are at safe levels
10. Marine litter does not cause harm
11. Introduction of energy (including underwater noise) does not adversely affect the ecosystem

Table 2.1 lists the current status of all 11 descriptors and consistency of proposed survey works with achieving/ maintaining GES for these descriptors.

The zone of influence for the proposed surveys encompasses Lower Slaney Estuary (IE_SE_040_0200), classified as a transitional water body as per the Water Framework Directive (WFD). Under Irish MSFD implementation, transitional waterbodies are assessed using existing WFD monitoring programmes. The chemical and ecological status of the Lower Slaney Estuary as reported under the WFD is provided in Attachment 4.5 Compliance with Water Framework Directive.

Table 2.1: Current Status of MSFD Descriptors and Consistency of Proposed Surveys with MSFD and Descriptor Targets

MSFD Descriptor	Latest Environmental Status (2024)⁴	Potential Effects	Consistency Statement (including consistency with descriptor targets as listed in Ireland's Marine Strategy³)
D1 - Biodiversity	GES partially achieved. Numerous species are not in a good status, and status for many species groups is unknown.	Potential disturbance to seabirds, water fowl and species foraging along the banks of the riverine corridor. Potential disturbance to marine mammals from underwater noise. Temporary disturbance of riverbed during subtidal and intertidal grab sampling.	As stated in Section 3.4.5 of the AA / NIS (Attachment 4.3) the surveys will be undertaken outside of the peak wintering bird season (December – February). Soft start procedures will be used for acoustic sources during surveys. Section 3.4.2 of the AA / NIS states further guidance and mitigation measures to address key potential sources of anthropogenic sound that may impact negatively on marine mammals. Section 3.4.3 of the AA / NIS states mitigation measures to minimise physical disturbance associated with the surveys. The proposed surveys do not involve any fishing gear and will not result in accidental by-catch (D1T1). The proposed surveys are short-term and over a small area. Grab samples are limited in number and will not affect population abundance of species, the conservation status of species protected under the EU Habitats Directive (D1T2), and distributional range of species (D1T4). Benthic sampling will result in negligible, localised disturbance with rapid natural recovery, therefore not affecting the species habitat (D15). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D1.
D2 - Non-indigenous species	GES fully achieved.	Potential introduction of non-indigenous species via ballast water and survey equipment.	All vessels engaged in the surveys will comply with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (Ballast Water Management Convention, 2004) and the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS Convention, 2001). Vessels are operated in accordance with MARPOL (marine pollution) requirements and relevant EU and national legislation, including Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive alien species. Following mitigation measures, the proposed surveys will not provide a pathway for introduction of non-indigenous species (D2T1). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D2.
D3 - Commercial fish and shellfish	GES partially achieved. 46 stocks of commercially exploited fish and shellfish in Ireland's marine environment are not in a	Localised river bed disturbance during subtidal and intertidal grab sampling. Temporary effects on fish and shellfish due to noise from survey vessel and equipment.	As stated in Section 3.3.1.1 of the AA / NIS the proposed survey works will generate low-intensity underwater noise, with sound levels that fall well below thresholds associated with injury or permanent hearing damage to marine mammals and are comparable to, or lower than, noise emitted by routine commercial and fishing vessel traffic which is present and active further downstream.

⁴ Marine Strategy Framework Directive and Irelands' Marine Strategy Part 1 (Department of Climate, Energy and the Environment, 2024)

MSFD Descriptor	Latest Environmental Status (2024) ⁴	Potential Effects	Consistency Statement (including consistency with descriptor targets as listed in Ireland's Marine Strategy ³)
	good status, and status for 99 stocks is unknown.		Soft start procedures will be used for acoustic sources during surveys. Section 3.4.2 of the AA / NIS states further guidance and mitigation measures to address key potential sources of anthropogenic sound that may impact negatively on marine mammals. Operational controls will reduce disturbance to fish species and habitats. The nature of proposed survey works will not affect fishing mortality rate (D3T1) and fish stock biomass (D3T2) for commercially exploited species. Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D3.
D4 - Food webs	Status unknown as methods to determine GES are not sufficiently developed.	Proposed surveys are not directly relevant to this descriptor. Potential indirect effects due to displacement of prey species (like forage fish and plankton). These effects will be short-lived and temporary in nature.	The nature of proposed survey works is not relevant to the diversity (D4T1) or abundance (D4T2) of trophic guilds. Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D4.
D5 - Eutrophication	GES fully achieved.	Possible change in nutrient concentrations due to discharges from survey vessel, and due to sediment movement on the river bed during grab sampling. Any sediment movement during grab sampling will not result in nutrient concentration changes beyond natural variability.	Section 3.4.1 of the AA / NIS states mitigation measures to minimise pollution risk due to vessel leaks or discharges. Due to the limited nature of proposed survey works, and mitigation measures proposed, the proposed maritime usage will not affect nutrient concentration (D5T1), chlorophyll concentrations (D5T2), and concentrations of dissolved oxygen (D5T3). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D5.
D6 - Sea-floor integrity	GES partially achieved. 11% of Ireland's assessment area is not in good status and 15% remains not assessed or unknown.	Temporary disturbance of riverbed during subtidal and intertidal grab sampling. A total of 40 samples will be taken in the subtidal zone and a total of 48 samples in the intertidal zone. As discussed in Section 3.3.1.4 of the AA / NIS, the disturbance to riverbed will be localised, short-term and rapidly reversible, with no mechanism for effects to extend beyond the immediate sampling point. The WFD assessment (Attachment 4.5) confirms proposed surveys will not result in deterioration of waterbody status.	The footprint of grab samples is very small and will not alter sea-floor integrity. The size and number of samples to be collected will not adversely affect the ecosystem function (D6T1). Following mitigation, any temporary and localised disturbance during surveys will not adversely affect habitat condition (D6T2). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D6.

MSFD Descriptor	Latest Environmental Status (2024) ⁴	Potential Effects	Consistency Statement (including consistency with descriptor targets as listed in Ireland's Marine Strategy ³)
D7 - Hydrographical conditions	GES fully achieved.	Localised, short-term effects are anticipated due to vessel movement during hydrographic and benthic surveys.	There will be no permanent alteration of hydrographical conditions due to the duration of surveys and number of vessels required. Any short-term disturbance will not affect structure and functions of the ecosystem (D7T1). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D7.
D8 - Contaminants	GES fully achieved.	Risk of accidental release of fuels, oils, or lubricants into surface water from the use of survey vessel.	All vessels engaged in the surveys will comply with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (Ballast Water Management Convention, 2004) and the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS Convention, 2001). Vessels are operated in accordance with MARPOL (marine pollution) requirements and relevant EU and national legislation, including Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive alien species. Section 3.4.1 of the AA / NIS states mitigation measures to minimise pollution risk due to vessel leaks or discharges. These include presence of spill kits on site for duration of surveys, and an emergency response plan in place. The surveyors will be trained to use these. Any waste generated during the surveys will be taken on shore and disposed of in accordance with Waste Management Act 1996 (as amended). Following mitigation measures, the potential risk of contamination and associated biological / ecological effects will be minimised and not interfere with relevant thresholds and criteria to be achieved for the marine environment (D8T1, D8T2). Following operational controls, pollution risk will be minimised (D8T3). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D8.
D9 - Contaminants in seafood	GES fully achieved.	There are no direct pathways between proposed surveys and contamination in seafood. Contaminants from vessel used for surveys have the potential to indirectly enter the marine food chain.	All vessels engaged in the surveys will comply with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (Ballast Water Management Convention, 2004) and the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS Convention, 2001). Vessels are operated in accordance with MARPOL (marine pollution) requirements and relevant EU and national legislation, including Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive alien species. Section 3.4.1 of the AA / NIS states mitigation measures to minimise pollution risk due to vessel leaks or discharges. These include presence of spill kits on site for duration of surveys, and an emergency response plan in place. The surveyors will be trained to use these. Any waste generated during the surveys will be taken on shore and disposed of in accordance with Waste Management Act 1996 (as amended).

MSFD Descriptor	Latest Environmental Status (2024) ⁴	Potential Effects	Consistency Statement (including consistency with descriptor targets as listed in Ireland's Marine Strategy ³)
			Following mitigation measures, there is no anticipated accumulation of contaminants or hazardous substances in the marine food chain (D9T1). No potential risk to seafood safety. Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D9.
D10 - Marine Litter	GES partially achieved.	Effects associated with accidental release of plastic, waste and other survey debris.	Any waste generated during the surveys will be taken on shore and disposed of in accordance with Waste Management Act 1996 (as amended). Waste handling off shore will comply with vessel waste management procedures as per MARPOL Annex V (Prevention of Pollution by Garbage from Ships). The surveyors will ensure no release of litter to the marine environment. The operational controls will ensure that surveys do not contribute towards marine litter (D10T1a, D10T1b). Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D10.
D11 - Energy, including underwater noise	GES fully achieved.	Temporary effects on fish and shellfish due to noise from survey vessel and equipment.	As stated in Section 3.3.1.1 of the AA / NIS the proposed survey works will generate low-intensity underwater noise, with sound levels that fall well below thresholds associated with injury or permanent hearing damage to marine mammals and are comparable to, or lower than, noise emitted by routine commercial and fishing vessel traffic which is present and active further downstream. Soft start procedures will be used for acoustic sources during surveys. Section 3.5.2 of the AA / NIS states further guidance and mitigation measures to address key potential sources of anthropogenic sound that may impact negatively on marine mammals. Following mitigation, the proposed surveys will not result in sound sources exceeding levels that adversely affect populations of marine animals. Therefore, proposed maritime usage is consistent with current environmental status and achievement of relevant targets for D11.

3 Conclusion

Table 2.1 lists potential effects from proposed surveys on the 11 MSFD descriptors and their targets. This table also includes relevant mitigation measures and operational control procedures.

The proposed surveys will be temporary with no permanent footprint in the marine environment. With mitigation in place, these surveys will not compromise Ireland's ability to achieve or maintain GES under the 11 MSFD descriptors.

