An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

August 20, 2026

licence@mara.ie

RE: MUL260051 - Oriel Windpark

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application submitted by Oriel Windfarm Limited. Oriel Windfarm Limited request a licence to conduct site investigation works of the offshore wind farm area and the offshore cable corridor to investigate the stability of the soil (seabed sediments) for the detailed design of foundations, wind turbines and the offshore substation and the detailed routing of cables within the offshore wind farm area and the offshore cable corridor off the coast of County Louth.

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 site investigation works 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) and Bord Iascaigh Mhara (BIM) on the application were requested.

The MI note that the applicant continues to state that the impact of the development, and its cumulative impact when considered alongside other Irish Sea developments, will be non-significant and minimal. The impacts are described as potentially low by the applicant; however, the MI point out that **the sensitivity of operators to displacement could be high, and this does not appear to be sufficiently acknowledged.**

The MI highlight scientific reviews of the impacts of offshore renewable energy (ORE) on fishing activity indicate **reductions of 77–94% for mobile gear fisheries and approximately 36% for static gear fisheries, indicating development could be significant**. Furthermore, **displacement from ORE extends beyond the immediate boundary of the development**. The MI recommend that impact assessments should therefore include an appropriate buffer around the development to more accurately represent this potential displacement.

The MI also note that species-specific information and biomass maps are available for the razor clam fishery, as outlined in the Marine Institute's *Shellfish Stocks and Fisheries Review 2025*. The fishery overlaps with the development area, and it appears that this information has not been utilised in assessing the impacts of the development.

The MI highlight that more recent landings data is publicly available through the EU data portal or specific requests could be made to the component Irish data holder. Based on this information, there is potential that the full impact of the development has not been fully assessed or accurately described. **To fully calculate the impact of the development a project socio-economic impact assessment is recommended.**

BIM advise in their observations that mussels and oysters being filter feeders, are sensitive to large influxes of sedimentation when it occurs in the water column. Sedimentation can lead to loss of growth and condition and ultimately increased mortality levels.

From an inshore fisheries perspective there is currently substantial fishing effort for lobster, crab and razor clams in the proposed MUL licenced area, along with a nearby potential shellfish aquaculture licensed site.

These potential aquaculture operations and Inshore fisheries activity should be taken into account in any Risk Assessment considerations for the Oriel wind farm site's and the proposed MUL application licence area activities.

BIM suggest that the applicant engage and keep all fishers, aquaculture establishments, the NE Regional Inshore Fisheries Forum (RIFF) and the Carlingford Lough Co-ordinated Local Aquaculture Management Systems Group (CLAMS) informed of their activities on an on-going basis.

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 the site investigation works 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, in this order of preference, 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 Notice/s, 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.

DAFM note that a variety of fishing activities take place adjacent to the proposed development site, including dredge fishing for razor clam and cockle, and pot fishing, including for lobster and crab.

Fishing for razor clam in Irish waters is largely based on the east coast, with fisheries located in the North Irish Sea (Howth to Dundalk Bay) and off Wexford. The North Irish Sea razor clam fishery, which overlaps with the development area, is a well-established and economically valuable fishery. In 2025, the total value of razor clam landings in Ireland was estimated at approximately €7.6 million, with the North Irish Sea fishery supporting over 70 vessels in recent years with the catch mainly exported to Asia.

Dundalk Bay is of particular importance, as it is also the only area in Ireland to have supported commercial dredge fisheries for cockle in recent years, underlining its worth to the inshore sector. Given that the vessels involved in the razor clam fisheries and Dundalk Bay cockle fishery are required to carry GPS tracking equipment their activities are also more visible than the rest of the inshore fleet.

A challenge for the inshore fleet more generally 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. This limitation is highly relevant to the proposed development, as it complicates planning and impact assessments for the inshore sector. Direct engagement and ongoing consultation with these operators is therefore essential, including with stakeholders such as the North East Regional Inshore Fisheries Forum (NE RIFF).

The displacement of the inshore fleet is a concern in the context of the proposed development. Potential impacts include increased steaming times to fishing grounds, potential restrictions on key fishing grounds, heightened fishing pressure on adjacent shellfish resources, gear conflicts, and economic effects on operators. The sensitivity of operators to displacement should be fully acknowledged.

Finally, and as stated earlier, the MI and BIM have provided detailed observations on the proposed development, which have been attached to the DAFM submission.

DAFM reiterates that is it critical that development is informed by the specific intensity of fishing in the proposed area, and that the developers need to work closely and constructively with our seafood sector to ensure that any adverse impacts are avoided, minimised or mitigated, in that order, in accordance with requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework.

Yours sincerely,

Marine Divisions
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food, and the Marine