

MAC Report	
Application for a Maritime Area Consent (MAC) under section 79 of Maritime Area Planning Act 2021, as amended (the Act)	
Application Details	
MAC Applicant:	Gas Networks Ireland
MAC Reference No:	MAC260022
Location:	Cahiracon, Co. Clare.
Date Application received:	24 July 2026
Proposed Maritime Usage:	Gas Networks Ireland has applied for the development of a jetty and associated infrastructure within the maritime area, to provide a safe and secure berth for a Floating Storage and Regasification Unit (FSRU) at Cahiracon, Co. Clare.
Recommendation:	To approve part granting of the MAC sought with conditions attached.

Document Control			
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Reviewed and approved by:	Jacinta Ponzi	Head of Maritime Area Consenting	18/08/2026
Final Report Version 1:	Paul Brennan	MAC Manager	18/08/2026

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1 Overview

On 24 July 2026, MARA received a Maritime Area Consent (MAC) application under section 79 of the Maritime Area Planning Act 2021, as amended (the Act) from Gas Networks Ireland for the development of a jetty and associated infrastructure within the maritime area, to provide a safe and secure berth for a Floating Storage and Regasification Unit (FSRU) at Cahiracon, Co. Clare.

2 Background

Gas Networks Ireland (GNI) has applied for a MAC for the occupation of the maritime area for a state-led strategic gas emergency reserve project, proposed for a site on the northern shore of the Shannon Estuary in the townland of Cahiracon in County Clare. The Applicant states that *“The project is being developed in line with the government’s Energy Security in Ireland to 2030 strategy, specifically Annex 2 – Securing Ireland’s Gas Supplies (Department of Climate, Energy and the Environment, 2023). This strategy was published as part of Ireland’s Energy Security Package. It identifies that Ireland has legal requirements under Gas Regulation (EU) 2017/1938 in respect of meeting a prescribed infrastructure standard which requires that EU Member States are capable of meeting exceptionally high gas demand in the event of a loss of its largest single piece of gas infrastructure. At present, Ireland has no gas storage solution available which is of a scale capable of meeting peak demand in the event that the largest interconnection (IC2) with the UK were to fail. Any long-term gas storage solution must also be compatible with the development of renewable hydrogen and consistent with Ireland’s climate objective of being climate neutral no later than 2050 as established by the Climate Action and Low Carbon Development (Amendment) Act 2021.”*

The Applicant states that *“The proposed project in Cahiracon will include the development of a jetty within the maritime area, the final location of which will be determined pending site investigations”* but is expected to be broadly in accordance with the indicative site layout drawing provided by the Applicant and reproduced in Figure 1 of this report. The Applicant also states *“The purpose of the jetty will be to provide a safe and secure berth for a Floating Storage and Regasification Unit (FSRU) and a visiting LNG Carrier (LNGC). An FSRU is a specialist vessel designed to transport, store and regasify Liquefied Natural Gas (LNG) to natural gas when required. The FSRU will store LNG to be used in the case of an emergency event. It shall be equipped with a sub-cooler to lower the temperature of the LNG below its boiling point thereby limiting Boil Off Gas (BOG) formation. This limitation in BOG will help maximise LNG inventory and thereby reduce the number of LNG deliveries to the facility. Deliveries of LNG, when required, will be by Ship-to Ship (STS) transfer from an LNGC berthed alongside the FSRU using cryogenic hoses. The FSRU will be connected to an onshore terminal via high pressure hoses and a pipeline. The onshore terminal will include the necessary equipment to condition, monitor and measure the gas prior to transmission to the national gas network as well as associated utility and ancillary facilities.”*

In summary, the Applicant states that the overall proposed project, including terrestrial elements, will comprise the following: -“

- Jetty
- Trestle
- FSRU
- Periodic mooring of an LNGC
- Onshore Terminal including Above Ground Installation (AGI)
- Gas pipeline connecting the FSRU to the onshore terminal
- Gas pipeline connecting the onshore terminal to the national gas network
- Utility connections including Medium Voltage (MV) electrical connection to ESBN distribution network and water connection to Uisce Éireann network
- Access Tracks

The FSRU will remain at the jetty for as long as the Strategic Gas Emergency Reserve is required to be maintained which is up to the end of 2049. It is intended that the facility will then be decommissioned and the site rehabilitated.”

3 Proposed Maritime Usage

The Applicant states that *“The proposed jetty will comprise a pile-founded marine structure extending from the shoreline into navigable waters.”* and that the proposed *“jetty structure will be supported on vertical piles installed into the seabed. The pile material, dimensions, and installation methodology (e.g. driven, drilled or socketed piles) are currently under technical development and will be finalised following detailed geotechnical investigations and design optimisation to ensure compliance with relevant standards and site-specific ground conditions.”*

The Applicant also states *“The piles will be transversely connected by reinforced concrete pile caps, cast in situ, forming structural crossbeams designed to transfer vertical, horizontal, and accidental loads (including berthing and environmental loads) to the foundation system. Longitudinal structural continuity will be provided by precast prestressed reinforced concrete beams, spanning between adjacent pile caps. These longitudinal members will support the jetty deck and transfer loads along the jetty axis. The use of prestressed concrete elements is intended to enhance structural efficiency, durability, and resistance to the aggressive marine environment.*

The top side structure will accommodate the following elements:

- Natural gas transfer lines and associated pipe racks;
- Utilities, monitoring, and safety systems;
- Access routes for personnel and operational equipment;

- *Marine fendering, mooring systems, and emergency response equipment compatible with FSRU operations.*

Construction activities may include:-

- *Marine piling operations using floating barges/jack up or cantilever shore side approach;*
- *In-situ casting of reinforced concrete pile caps;*
- *Installation of precast prestressed concrete beams;*
- *Deck construction and installation of natural gas-related infrastructure.*

Once the construction of the facility is complete, an FSRU will be berthed alongside, safely moored and connected to the shore systems already pre-installed on the jetty. During operation, the jetty will be used as a service and access structure for the FSRU. It will support LNG offloading from LNG Carriers moored alongside the FSRU in side-by-side configuration. It will also facilitate routine marine operations and emergency access, in accordance with applicable safety and operational procedures.”

Routine inspection and maintenance activities will be undertaken throughout the operational life of the jetty to ensure structural integrity and safety.

These activities may include: -

- *Visual and above-water inspections;*
- *Underwater inspections of piles and foundations;*
- *Localised concrete repairs and corrosion protection measures;*
- *Maintenance or replacement of fenders, mooring equipment, and ancillary systems.*

The proposed development is a temporary State-led strategic energy security project, currently proposed to operate until the end of 2049, after which the facility is intended to be decommissioned and removed, subject to the requirements of the relevant consent process. Decommissioning activities will commence during the final 12-24 months of facility operations and will include the initiation of required authorisation processes, preparation of procurement documentation, and contractor procurement.

Decommissioning may include: -

- *Removal of deck structures and superstructure elements;*
- *Dismantling of prestressed concrete beams and pile caps;*
- *Cutting of piles at or below seabed level, where deemed environmentally and technically appropriate.*

Where feasible, rehabilitation or partial retention options may be considered to minimise environmental impacts and disturbance to the seabed.

The MAC area sought by the Applicant, including an indicative layout of the elements of the scheme within the maritime area is illustrated in *Figure 1*.



Figure 1 – Applicant Indicative site layout drawing of marine infrastructure and proposed MAC area

4 Site Visit

Senior Marine Advisor, Philip Newell inspected the site on 06 August 2026. The proposed site is located approximately 1 km south of Inishmurray Quay and Inishmurray Island. In the wider context of the Shannon Estuary, the site is situated 4km west-northwest of the Aughinish Alumina Limited facility and 3.5km northwest of the Port of Foynes, both of which are located on the opposite shoreline in County Limerick. The site occupies a relatively open and predominantly rural section of the northern shore of the estuary, facing established industrial and port-related uses on the southern shore. The existing shoreline and immediate maritime area on the northern side of the Shannon Estuary in the vicinity of the townland of Cahiracon are relatively undeveloped. The lands surrounding the proposed site, and the immediately adjoining maritime area, were found to be largely inaccessible from the public domain, with the terrestrial site enclosed by fencing with no readily identifiable public access route to the shoreline. Consequently, direct inspection of the shoreline immediately adjoining the proposed development area was not possible on the day of the inspection. The site inspection was therefore undertaken from the adjacent shoreline immediately to the north of the proposed development area, to the south of Inishmurray Quay, from which views towards the proposed site and the adjoining maritime area could be obtained.

The maritime area visible from the inspection location comprises a predominantly natural and undeveloped intertidal shoreline, characterised by extensive areas of intertidal mud flats, rock and exposed seaweed at low tide. The shoreline is relatively shallow and gently shelving, with areas of exposed substrate extending a considerable distance seaward. The shoreline is backed in places by scrub, mature woodland and agricultural land, with no evidence of any infrastructure or existing public use along the section of coast visible during the inspection. Except for Inishmurray Quay, which is 1km remote from the proposed site, no apparent slipways, promenades, designated bathing areas or other infrastructure indicative of significant regular public recreational use was evident within the maritime area adjoining the site.

The proposed jetty and FSRU would introduce new development extending into the maritime environment towards the navigation channel which serves the wider Shannon Estuary. The presence of established port and industrial activity at Aughinish and Foynes further demonstrates the working maritime character of the wider Shannon Estuary. The Applicant has submitted a Preliminary Navigational Risk Assessment in support of their application.

Photographs 1 to 3 detail the character of the maritime area in the vicinity of the proposed works. The photographs demonstrate the open and relatively remote character of the estuarine setting, with extensive views across the Shannon Estuary towards the opposite shoreline and the established industrial and port-related development at Aughinish and Foynes. There was nothing evident on the day of the site inspection that would preclude MARA from granting a MAC for the proposed maritime usage.



Photograph 1 – View towards proposed MAC area looking southwest– [PN 06/08/2026]



Photograph 2 – View towards Inishmurray Island and Inishmurray Quay looking north– [PN 06/08/2026]



Photograph 3 – View towards Port of Foynes and Foynes Island looking southeast– [PN 06/08/2026]

5 Review of Legislation & Associated Consents

5.1 Applicable Provisions of the Maritime Area Planning Act, 2021 as amended (the Act)

Under the Act, MARA has responsibility for granting MACs.

Schedule 3 and Schedule 4 of the Act specifies maritime usages for which a MAC is not required, including where the proposed maritime usage falls under the remit of another enactment, is navigation or fishing, is a licensable activity under schedule 7 or where the activity is to be undertaken on private land. The proposed maritime usage is not considered to fall under those listed under Schedule 3 or 4 of the Act.

The *Development (Strategic Gas Reserve) Bill 2026* has progressed through the Houses of the Oireachtas and has been signed into law by the President on 23 July 2026 as the *Development (Strategic Gas Reserve) Act 2026 (Act 36 of 2026)*.

The proposed project constitutes designated development within the meaning of the *Development (Strategic Gas Reserve) Act 2026*, which requires Ministerial approval under section 29 of that Act. As designated development, development permission (as defined in Section 2(1) of the MAP Act) does not apply to the proposed project.

In accordance with Section 76 of the MAP Act, a MAC is required for the occupation of that part of the maritime area for any such usage where development permission is not required. Accordingly, the subject of this application is considered to fall under Section 76 of the Act.

Where the *Development (Strategic Gas Reserve) Act 2026* is not commenced prior to the granting of a MAC should one be granted, the MAC Commencement Date shall align with the commencement date of the *Development (Strategic Gas Reserve) Act 2026* in accordance with Section 1(2) of that Act.

5.2 Existing Consents & Authorisations

A search of the MARA's GIS database was undertaken on 10 August 2026 for spatial overlap between the proposed MAC areas and existing foreshore authorisations and MARA licences and consents. The proposed MAC area does not overlap with any existing MACs or foreshore records. The proposed MAC area overlaps with two existing Maritime Usage Licence (MUL) consents as detailed in *Figure 2* and *Table 1*.



Figure 2 – Overlaps between proposed MAC area and existing

Table 1: Summary of Overlapping maritime authorisations and foreshore authorisations				
File Reference Number	Applicant/ Holder	Consent Type	Maritime Usage	Status
MUL240034	Gas Networks Ireland	Maritime Usage Licence	Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of	Active (Expires 27/06/2027)

			2000 in relation to the proposed Strategic Gas Emergency Reserve.	
MUL250010	Gas Networks Ireland	Maritime Usage Licence	Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000 in relation to the proposed Strategic Gas Emergency Reserve.	Active (Expires 11/02/2031)

MUL240034 and **MUL250010** are Maritime Usage Licences, held by the Applicant, for marine environmental surveys relating to the proposed Strategic Gas Emergency Reserve project, the subject of this application. Marine environmental surveys are proposed within two areas of the Shannon Estuary, adjacent to the townlands of Cahiracon and Tarbert, to provide high-quality baseline data that can contribute to a reliable basis for site selection for the proposed Strategic Gas Emergency Reserve. The surveys entail the deployment and retrieval of static acoustic monitoring (SAM) devices, acoustic doppler current profilers (ADCP), geophysical surveys, geotechnical investigations and ecological and archaeological surveys. These MULs are held by the Applicant and are non-exclusive in nature. It is therefore considered that the proposed usage, the subject of this application, can co-exist with the existing licensed activities.

The Marine Institute's Ireland's Marine Atlas database¹ was searched on 10 August 2026 for spatial overlap between the proposed MAC area and any Department of Agriculture, Food and the Marine (DAFM) foreshore authorisations for aquaculture sites. No existing DAFM foreshore authorisations, or applications for the same were identified as overlapping the proposed MAC application area.

In summary, no existing MACs, MULs, foreshore authorisations (including those for aquaculture) or applications for same which would impede MARA in granting a MAC for the proposed maritime usage were identified as overlapping the proposed MAC application area.

5.3 Registered Lands

A search was undertaken by MARA of the Tailte Éireann database on 10 August 2026¹ for any folios in order to ensure that there are no overlaps with registered maritime area within the MAC area as outlined in the proposed MAC Map as applied for in the subject MAC application.

Two folios (CE57250F and CE66412F) at Cahiracon Point, which are registered under the Registration of Title Act 1964, were found to overlap with the proposed MAC area as shown in *Figures 3 and 4*.

¹ <https://atlas.marine.ie/>

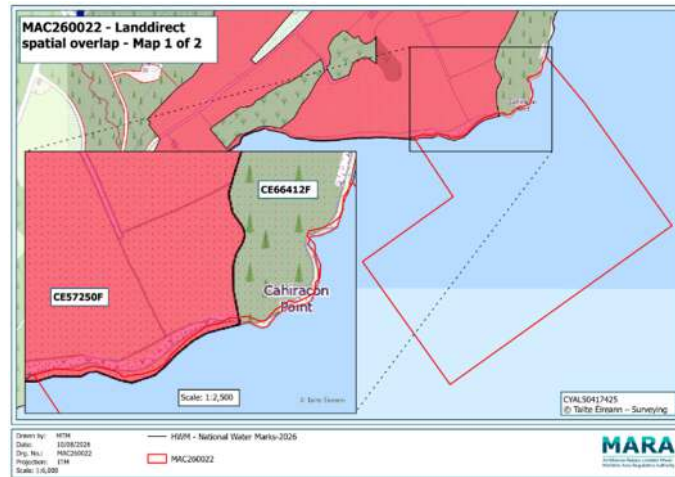


Figure 3 – Overlap between proposed MAC area at Cahiracon Point and registered maritime areas Map 1 of 2

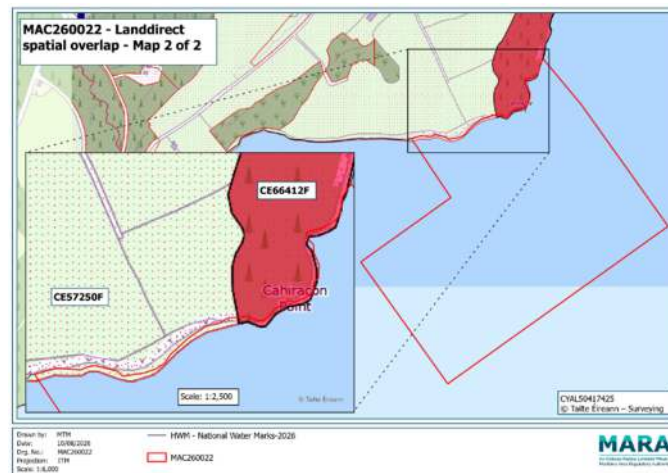


Figure 4 – Overlap between proposed MAC area at Cahiracon Point and registered maritime areas Map 2 of 2

In accordance with Section 99(3)(b) of the Act, Part 4 of the MAP Act shall only apply to that part of the maritime area which is in state ownership. Accordingly, a MAC cannot be issued on registered maritime area. Considering the above it is recommended that, should a MAC be granted, it is part granted for that portion of the maritime area which is in state ownership.

5.4 Development Permission

The Applicant has stated that the project requires ministerial approval under section 29 of the *Development (Strategic Gas Reserve) Act 2026*.

As designated development within the meaning of the *Development (Strategic Gas Reserve) Act 2026* development permission (as defined in Section 2(1) of the MAP Act) does not apply to the proposed project.

In accordance with Section 76 of the Act, a MAC is required for the occupation of that part of the maritime area for any such usage where development permission is not required.

Owing to the nature and scale of the proposed works, it is considered reasonable that the MAC Holder (if successful in obtaining a MAC) should submit an application for ministerial approval, in accordance with section 29 of the *Development (Strategic Gas Reserve) Act 2026*, within 18 months of the commencement date of the MAC.

6 Assessment

6.1 Schedule 5

The MAC application was submitted on 24 July 2026 with the appropriate fee paid on 24 July 2026 and reviewed for completeness on 24 July 2026. The application was deemed complete by MARA on 24 July 2026.

A request for additional information was issued on 04 August 2026 under section 79(3) of the Act and the associated response received relating to matters for technical assessment on 05 August 2026.

Schedule 5 of the Act sets out the criteria to which MARA must have regard when assessing a MAC application. This report sets out the assessment undertaken pursuant to section 5 of the Act. The assessment is summarised in Table 2 below.

Table 2: Synopsis of the assessment of the application with regard to the requirements of Schedule 5		
Schedule 5 Requirements		Synopsis
1.	The nature, scope and duration of the occupation of the maritime area concerned for the purposes of the proposed maritime usage.	Details of the proposed maritime usage, including the nature, scope and duration are described in Sections 3 & 4 above. The Applicant has sought a MAC term of 24 years. The Applicant states that “<i>The proposed design life for the maritime infrastructure will be 50 years based on IS EN 1990 Basis of Structural Design (Eurocode). The operational lifetime of the project is however expected to be not greater than 20 years covering the period from circa 2030 to end of 2049.</i>” The Applicant also states that “<i>The requested term for the proposed maritime usage, which is significantly shorter than the expected design life of the physical infrastructure, reflects the transitional nature of the project from an energy security and climate perspective. The proposed end date for the project is consistent with Ireland's Climate objectives to be carbon neutral by no later than 2050.</i>”

		Accordingly, a MAC term of 24 years (allowing for ministerial approval, in accordance with section 29 of the Development (Strategic Gas Reserve) Act 2026, construction and rehabilitation/decommissioning phases) is recommended.
2.	Whether the proposed maritime usage is in the public interest.	The Applicant states <i>“Energy Security in Ireland (ESI) to 2030’ outlines a comprehensive strategy aimed at ensuring energy security throughout the current decade while facilitating a sustainable transition towards a carbon-neutral energy system by 2050. Published in November 2023, this strategy is the outcome of an extensive process which involved a thorough review of Ireland’s electricity and gas networks (CEPA report), an extensive public consultation and an Independent Review of the Security of Electricity Supply (the McCarthy Report). The main conclusions of the McCarthy Report were that the reliance on gas-fired electricity generation to supplement renewables gives rise to security of natural gas concerns and the essential role of conventional generation that will be capable of conversion to hydrogen or other renewable gases in the future.</i> <i>Action 17 of ESI proposes the implementation of a “Strategic Gas Emergency Reserve to protect Ireland in the event of a gas supply disruption as Ireland makes a secure transition to a majority renewable energy”. The strategy underscores that Ireland is heavily dependent on gas imports through the UK interconnectors and, since Brexit and the decline of the Corrib field, Ireland no longer meets the N-1 standard on a standalone basis and that this proposed strategic emergency reserve will address this deficiency, while acting as a transitional measure, ensuring national energy security while enabling the transition to net zero emissions by 2050.</i> <i>The Strategic Gas Emergency Reserve is in alignment with further national policy including the ‘National Energy and Climate Plan (2021-2030) (2024)’ identifies gas security measures as a transitional requirement while Ireland decarbonises its energy system and increases renewable generation. Section 3.3.1 of the Plan concludes: “As a transitional measure, we will introduce a Strategic Gas Emergency Reserve to address security needs in the medium-term, to be used only if a disruption to gas supplies occur.</i> <i>Further to the above policy alignment, it is noted that on Thursday, 23rd January 2025, the Government issued the ‘Programme for Government 2025 – Securing Ireland’s Future’, which included the commitment that the government will “Take all necessary action to ensure and protect Ireland’s energy security”.</i> <i>On Tuesday, 4th March 2025, the Government gave approval to proceed with the development of a State-led strategic gas emergency reserve. The delivery of a temporary gas reserve is deemed critical to Ireland’s energy security as we continue to transition to indigenous, clean, renewable energy. The proposed project constitutes the delivery of the optimum solution for the strategic reserve. “</i> The Applicant also stated <i>“The EU has developed policies and legislation on an incremental basis to address energy security with regard to both geopolitics and EU climate action ambitions.</i> <i>Regulation 994/2010, published in 2010 by the European Commission (EC), concerns measures to safeguard the security of supply (SoS) for Member States mandating that all Member States formulate “Preventive Action Plans” and “Emergency Plans” to deal with gas supply crises and to ensure that gas supplies are guaranteed to households and other protected customers for a period of 30 days. Article 6 of this regulation also introduced an infrastructure standard (commonly referred to as the N-1 Infrastructure Standard or N-1 for short) requiring Member States to ensure that the necessary measures are taken so that in the event of disruption to the single largest piece of gas infrastructure, the capacity of the remaining gas infrastructure can satisfy total gas demand on a day of exceptionally high gas demand, defined as a day occurring with a statistical probability of once in 20 years.</i>

		<i>While Regulation (EU) 2017/1938 has explicitly repealed and replaced Regulation (EU) No 994/2010, it has retained the N-1 infrastructure standard prescription for member states As per the 'National Risk Assessment (2022)' published by the CRU in December 2022, Ireland is unable to meet the N-1 infrastructure standard in the event of failure of its largest piece of gas infrastructure and identifies it as a matter of national security which requires immediate attention.</i> <i>In turn, the proposed project will ensure national alignment with EU policy concerning the national energy security and infrastructure resilience of member states through enabling Ireland to be compliant with the mandatory N-1 Infrastructure Standard set out by the EU."</i> Having regard to the above the proposed maritime usage is considered to be in the public interest.
3.	The location and spatial extent of the occupation of the maritime area concerned for the purposes of the proposed maritime usage.	Details of the location, relevant consents, ownership and development permissions are provided in Sections 3 to 5 above. The total area proposed to be occupied by the MAC is 322,533 m² comprising a single MAC Area. A search was undertaken by MARA of the Tailte Éireann database on 10 August 2026 for any folios in order to ensure that there are no overlaps with registered maritime area within the MAC area as outlined in the proposed MAC Map as applied for in the subject MAC application. Two folios at Cahiracon Point, which are registered under the Registration of Title Act 1964, were found to overlap with the proposed MAC area (see section 5.3 for more detail). It is therefore recommended that any MAC which may issue should be part-granted to exclude those parts of the maritime area that are registered as outlined above. It is therefore recommended that any MAC which may issue should be part-granted, over a total area of 322,533m², as illustrated in <i>Figure 5</i> (Proposed MAC Map) in Section 7, to exclude those parts of the maritime area that are registered as outlined above.
4.	Guidelines issued under section 7 which are relevant to the proposed maritime usage.	No such guidelines have been published to date.
5.	Whether the Applicant is a fit and proper person (within the meaning of Schedule 2) to be granted a MAC, both at the time the application is made and at the time that the MAC application concerned is determined by the MARA.	In accordance with S.I. No. 375/2026 - Maritime Area Planning Act 2021 (Fit and Proper Person – Gas Networks Ireland) Order 2026, the Applicant has been declared as a fit and proper person to be granted and to hold any MAC in accordance with section 90(1)(b) of the Act.

6.	Whether the Applicant is tax compliant, both at the time the application is made and at the time that the MAC application concerned is determined by the MARA.	The Applicant submitted Tax Registration Number and Tax Clearance Access Number (TCAN) which was used to view the Applicant's tax clearance certificate. Based on the review of the tax clearance certificate, the Applicant is considered tax compliant.
7.	In the case of any maritime usage relating to offshore renewable energy (within the meaning of section 100), the consistency of the MAC application concerned with the development plans of the transmission system operator (within the meaning of section 100).	Not applicable
8.	The National Marine Planning Framework (NMPF).	In accordance with the Maritime Area Planning Act 2021, MARA is obliged to adopt such measures, consistent with its functions, as are necessary to secure the objectives of the National Marine Planning Framework (NMPF) in the giving of any authorisation for the purposes of any maritime usage or proposed maritime usage. Accordingly, this application has been assessed with regard to the National Marine Planning Framework (NMPF). It is considered that the proposed project aligns with the following policy objectives of the NMPF: - • Co-existence Policy 1 - Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. • Infrastructure Policy 1 - <i>Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.</i> • Natural Gas Storage Policy 1 - <i>Subject to assessments required for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), natural gas storage proposals should be supported.</i>

		• Transmission Policy 6 - Subject to required assessments for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), and not involving the importation of fracked gas, additional proposals for natural gas transmission/import infrastructure should be supported. • Ports, Harbours and Shipping Policy 1 - To provide for shipping activity and freedom of navigation the following factors will be taken into account when reaching decisions regarding development and use: ○ The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and approaches to ports as well as key littoral and offshore routes; ○ A mandatory Navigation Risk Assessment; ○ Where interference is likely: whether reasonable alternatives can be identified; and ○ Where there are no reasonable alternatives: whether mitigation through measures adopted in accordance with the principles and procedures established by the International maritime Organisation can be achieved at no significant cost to the shipping or ports sector. In the application, the Applicant states that the proposed project is consistent with the environmental objectives of the NMPF. Based on the above, it is considered that the proposed works align with the above overall objectives and policy objectives of the NMPF.
9.	The extent and nature of the preparatory work already undertaken by the Applicant towards ensuring the efficacious undertaking of the proposed maritime usage the subject of the MAC application concerned should the Applicant be granted a MAC in respect of such usage.	The Applicant states that <i>"A range of preparatory activities and site investigations have been undertaken and are ongoing in support of the proposed maritime usage."</i> Gas Networks Ireland have been granted two Marine Usage Licences to undertake site investigation works relating to the proposed project. The investigations include surveys and assessments to inform the design of the proposed jetty and associated maritime infrastructure and to inform the baseline for the associated EIAR. Additionally, other environmental and metocean surveys have been carried out including the deployment of Static Acoustic Monitors (SAMs) and Acoustic Doppler Current Profilers (ADCPs) to gather baseline data on the marine environment, including marine mammal monitoring and metocean conditions. The Applicant states that <i>"The findings of these investigations and surveys will inform the design, environmental assessment, and overall development of the proposed project."</i> Having regard to the above and considering that the project is at an early stage of design, the extent of the preparatory works undertaken are considered acceptable for a project of this scale and nature.

10.	The extent and nature of stakeholder engagement undertaken by the Applicant in respect of the proposed maritime usage.	The Applicant stated that “Gas Networks Ireland has undertaken significant stakeholder engagement to date including consultation with the local community, prescribed bodies and other relevant stakeholders. Several meetings have been held with the Department of the Environment, Climate and Communications, Clare County Council, elected members and local representatives, and landowners and other users of the Shannon including Shannon Foynes Port Company and Aughinish Alumina. Engagement with the Maritime Area Regulatory Authority has been ongoing since August 2024 and is continuing as GNI progresses with its marine studies and project design. The project team has also engaged with prescribed and specialist bodies relevant to the project, including the National Parks and Wildlife Service (NPWS), Irish Whale and Dolphin Group, ESB, EirGrid and the National Oil Reserves Agency. These engagements have involved introducing the project, gathering baseline information, and seeking technical and environmental input to inform project design and assessment. The Applicant provided an initial list of stakeholders for consultation purposes, outlined below: <table><tr><th>Tier</th><th>Stakeholder</th></tr><tr><td>Competent Authorities</td><td>An Coimisiún Pleanála Environmental Protection Agency (EPA) Maritime Area Regulatory Authority (MARA)</td></tr><tr><td>Advisory Bodies</td><td>Clare County Council Kerry County Council Limerick County Council National Parks and Wildlife Service Irish Whale and Dolphin Group Inland Fisheries Ireland National Monuments Service (NMS) Health and Safety Authority Health Service Executive, Environmental Health and Emergency Planning Commission for Regulation of Utilities An Taisce Irish Aviation Authority Irish Defence Forces Fáilte Ireland Transport Infrastructure Ireland The Heritage Council Uisce Éireann Waterways Ireland</td></tr><tr><td>Others</td><td>Bat Conservation Ireland BirdWatch Ireland Friends of the Earth Friends of the Irish Environment Geological Survey Ireland Irish Farmers Association Irish Landscape Institute The Irish Wildlife Trust National Biodiversity Data Centre</td></tr></table>	Tier	Stakeholder	Competent Authorities	An Coimisiún Pleanála Environmental Protection Agency (EPA) Maritime Area Regulatory Authority (MARA)	Advisory Bodies	Clare County Council Kerry County Council Limerick County Council National Parks and Wildlife Service Irish Whale and Dolphin Group Inland Fisheries Ireland National Monuments Service (NMS) Health and Safety Authority Health Service Executive, Environmental Health and Emergency Planning Commission for Regulation of Utilities An Taisce Irish Aviation Authority Irish Defence Forces Fáilte Ireland Transport Infrastructure Ireland The Heritage Council Uisce Éireann Waterways Ireland	Others	Bat Conservation Ireland BirdWatch Ireland Friends of the Earth Friends of the Irish Environment Geological Survey Ireland Irish Farmers Association Irish Landscape Institute The Irish Wildlife Trust National Biodiversity Data Centre
Tier	Stakeholder									
Competent Authorities	An Coimisiún Pleanála Environmental Protection Agency (EPA) Maritime Area Regulatory Authority (MARA)									
Advisory Bodies	Clare County Council Kerry County Council Limerick County Council National Parks and Wildlife Service Irish Whale and Dolphin Group Inland Fisheries Ireland National Monuments Service (NMS) Health and Safety Authority Health Service Executive, Environmental Health and Emergency Planning Commission for Regulation of Utilities An Taisce Irish Aviation Authority Irish Defence Forces Fáilte Ireland Transport Infrastructure Ireland The Heritage Council Uisce Éireann Waterways Ireland									
Others	Bat Conservation Ireland BirdWatch Ireland Friends of the Earth Friends of the Irish Environment Geological Survey Ireland Irish Farmers Association Irish Landscape Institute The Irish Wildlife Trust National Biodiversity Data Centre									

		<i>The Southern Regional Assembly</i> <i>Office of Public Works</i> <i>Marine Institute</i> <i>Sustainable Energy Authority of Ireland</i> <i>Shannon Airport Authority DAC</i> <i>Shannon Integrated Framework Plan Steering Group</i>	
		The Applicant also stated “In addition, pre-scoping engagements have commenced with several others to follow. Since the announcement of the selected site, engagement with the local community has been at the forefront of GNI’s approach. An initial Community Briefing Session was held on 27th November 2025 to introduce the project to the community. Two follow up public consultation meetings were held on 25th and 26th February 2026 to provide further project updates to the community and to invite further engagement. Following announcement of the selected site to accommodate the project, a designated section of GNI’s website was launched and is maintained with updated information as the project progresses. Continued engagement will occur with statutory bodies and stakeholders as part of the statutory planning process. Engagement with local communities will continue through public information events and other consultation activities, providing opportunities for marine users, residents, and interested parties to obtain project updates and provide feedback as the design and assessment processes progress. The project webpage will be maintained and updated as the project progresses. The project team will also maintain and further develop engagement with key stakeholders, including Shannon Foynes Port Company and the Commissioners of Irish Lights, the Kildysart Currach Club, Foynes Yacht Club, and the Shannon Airport Authority in relation to navigation, port operations, and maritime safety. Ongoing consultation will also be undertaken with relevant prescribed bodies, statutory consultees, and industry stakeholders to ensure that potential impacts on marine users are identified, assessed, and appropriately managed. In addition, engagement will form part of the Environmental Impact Assessment process, including, as referenced in Section 8.1, consultation on the scope of the Environmental Impact Assessment Report (EIAR) and consideration of feedback received from stakeholders. This iterative engagement process will continue throughout the development of the project and prior to the submission of the planning application.” Having regard to the above, the extent and nature of the stakeholder engagement undertaken is therefore considered acceptable for a project of this scale and nature.	
11.	Where a competitive process referred to in section 93 or 103 is used, the outcome of such process.	Not applicable	
12.	Any additional criteria specified, for the purposes of this paragraph, in regulations made under section 80(2).	No such regulations have been made to date.	

6.2 Rehabilitation Schedule

Under section 96(1) of the Act, it is required that the holder of a MAC shall, before the expiration of the MAC, rehabilitate that part of the maritime area the subject of the MAC.

As this application falls for submission under section 76 of the Act, it is required that a rehabilitation schedule be attached to the MAC. Section 96(4) of the Act specifies particulars that should be included in a rehabilitation schedule that set out how the Applicant will discharge their rehabilitation obligations.

The Applicant submitted a Rehabilitation Schedule to MARA on 24 July 2026. Upon review of the requirements of section 96 of the Act, the Rehabilitation Schedule is considered satisfactory.

6.3 Section 83 – Nature of Use

Section 83(1) of the Act requires MARA in the granting of a MAC to specify whether the specific part of the maritime area the subject of that MAC is for exclusive use of the proposed maritime usage or not. Section 83(1) provides MARA discretion and flexibility to specify the nature of the use (i.e. exclusive, non-exclusive or may/may not be exclusive).

The Applicant has sought that the MAC be granted on a mixed use (exclusive and non-exclusive) or circumstantial use basis. Having regard to the nature and lifecycle of the proposed maritime usage the subject of this application, it is reasonably foreseeable that Gas Networks Ireland may be required to exclude access to parts of the MAC area on a temporary basis. For example, during construction, beach nourishment, maintenance, decommissioning and rehabilitation phases for health and safety reasons. Such temporary/short-term exclusions may be mandated by the planning authority or other authorities or legislation for specific purposes and durations. In this instance, it is considered that granting of exclusive use for the full term of the MAC is not merited, particularly having regard to co-existence and co-operation objectives of the NMPF. It is considered that exclusive use should only be permitted where use on an exclusive basis is required and provided for under another authorisation or enactment. Accordingly, it is recommended that the MAC is granted on a “may or may not be exclusive” basis contingent on circumstances that may arise after the granting of the MAC” in accordance with section 83(1)(c) of the Act.

6.4 Other Matters to which MARA must have regard

In addition to considerations under Section 6.1 to 6.3 above, MARA, in performing its functions, must have regard to matters as prescribed in Sections 3(3), 6(8), 7(1), 30 and 44 of the Act and Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended). However, the Development (Strategic Gas Reserve) Act 2026 disapplies Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended). Table 4 provides a synopsis of the regard that was had in relation to these matters when considering the subject application.

Table 4: Synopsis of other legislative matters to which MARA has had regard

Applicable legislation	Synopsis
Section 3(3)(a) & Section 44 (b) of the Act - obligations of the State under the United Nations Convention on the Law of the Sea (as transposed by the Maritime Jurisdiction Act 2021)	In accordance with Sections 8 and 9 of the United Nations Convention on the Law of the Sea (the Convention), subject to a right of innocent passage enjoyed by all other States, the Irish State has sovereign jurisdiction in respect of its internal waters and territorial sea, including the seabed, the subsoil and the airspace above. The State owns the seabed and subsoil of the territorial sea and the internal waters, including the mineral and other non-living resources located in or under the seabed, and of all forms of potential energy on, in, under and above the territorial sea and the internal waters. The proposed MAC area is fully located within the Irish State's territorial sea. Accordingly, MARA is considered to have jurisdiction in accordance with the Convention to consider the granting of a MAC for the proposed maritime usage the subject of this application.
Section 3(3)(b) of the Act - the obligations in respect of the rights of the public or any class of the public over the foreshore in relation to navigation and fishing	The proposed works constitute designated development within the meaning of the Development (Strategic Gas Reserve) Act 2026 (the Act), which require Ministerial approval under section 29 of the Act. Prior to the Minister's decision, An Coimisiún Pleanála (a public body under Maritime Area Planning Act 2021) has prescribed functions it is required to undertake pursuant to the Act, including comprehensive assessments and consultations. The consultative process involves public consultation in addition to consultation with a comprehensive list of designated authorities under the Act, which includes MARA, the Commissioner for Irish Lights (for navigational purposes, amongst other matters), Inland Fisheries Ireland and the Minister for Agriculture, Food and the Marine (both regarding fishing, amongst other matters). Safety of navigation, the protection of the marine environment (including the protection of fisheries) and the results of the public and designated authorities' consultations will be matters for consideration by An Coimisiún Pleanála when reaching a reasoned conclusion on the likely significant effects the proposed development may have on the environment in accordance with section 26 of the Act.
Section 6(8) of the Act- Marine Planning Policy Statements (MPPS)	In the assessment of this application, regard has been given to the Marine Planning Policy Statement (MPPS), which was introduced in 2019 pending development of the National Marine Planning Framework (NMPF) and adoption of the MAP Act 2021. The MPPS sets out overarching principles and high-level vision and objectives in relation to marine spatial planning. Strategic Principle 2 of the MPPS states "<i>Marine planning will enable Ireland to meet its relevant obligations under EU and International law...</i>". The proposed Strategic Gas Emergency Reserve is considered to support Ireland's ability to meet its relevant obligations under EU law relating to the security of gas supply. The project is being developed in line with the Government's <i>Energy Security in Ireland to 2030, Annex 2 – Securing Ireland's Gas Supplies (Department of Climate, Energy and the Environment, 2023)</i>. This strategy was published as part of Ireland's Energy Security Package. It identifies that Ireland has legal requirements under gas Regulation (EU) 2017/1938 in respect of meeting a prescribed infrastructure standard which requires that EU Member States are capable of meeting exceptionally high gas demand in the event of a loss of its largest single piece of gas infrastructure. On this basis, the proposed development is considered to align with the objective of Strategic Principle 2. Strategic Principle 3 of the Marine Planning Policy Statement provides that "marine planning will facilitate Ireland's transition to a low-carbon and climate-resilient economy." While the proposed development involves infrastructure associated with the use of natural gas, its purpose is to provide a temporary, emergency strategic gas reserve rather than to facilitate increased or continued routine fossil-fuel consumption. The facility is intended to provide resilience during the transition to a lower-carbon energy system and is not intended to result in long-term fossil-fuel dependency. On this basis, the proposed

	development is considered not to act against, or undermine, the objective of Strategic Principle 3, having regard to its temporary and emergency nature and its role within Ireland's wider transition to a low-carbon and climate-resilient economy. A revised MPPS is currently under development, highlighting Government commitment to forward planning in the maritime area.
Section 7(1) of the Act - Marine Planning Guidelines	No such Guidelines have issued to date.
Section 30 & Section 44(a) of the Act - Secure the Objectives of the NMPF	Discussion is provided in Table 2(8) above in relation to the regard that was had when considering whether the subject MAC application aligns with the objectives of the NMPF.
Section 44(c) of the Act - the policies of the Government or any Minister of the Government	As detailed above, regard has been given to the MPPS and NMPF when considering the subject MAC application. Furthermore, the proposed Strategic Gas Emergency Reserve is consistent with the <i>Government's Energy Security in Ireland to 2030</i> , and in particular, <i>Annex 2 – Securing Ireland's Gas Supplies (Department of the Environment, Climate and Communications, 2023)</i> , which identifies the need to strengthen Ireland's resilience to disruption of natural gas supplies. The proposed facility represents a strategic, State-led measure to provide an emergency reserve of gas and thereby enhance the security and resilience of Ireland's energy system, while supporting the transition towards a low-carbon energy system.
Section 44(d) of the Act - the need for co-operation between users of the same part, or adjoining parts, of the maritime area, or both	Consideration of users in the vicinity of the proposed MAC Area is provided in Section 5 and Table 2(3).
Section 15(1) of the Climate Action and Low Carbon Development Act 2015 (as amended)	MARA disapplies section 15(1) of the Climate Action and Low Carbon Development Act 2015 (as amended) pursuant to section 33 of the <i>Development (Strategic Gas Reserve) Act 2026</i> .

6.5 Levy

An annual MAC levy has been calculated based on the project type and proposed MAC area in accordance with MARA's MAC levy framework, as set out below.

MAPA Levy Framework Part:	Part A: Nearshore
Category/Class:	Development (non-commercial)
Tier:	Tier 4

Applicable Rate:	Base Annual Charge of €214.09 plus an add on of 0.2007 per sq.m for areas in excess of 100 sq.m
Area:	322,533m ²
Calculation:	€214.09 + (€0.2007 * (322,533.00 - 100.00))
Levy due:	€64,926.39

The MAC levy has been calculated as €64,926.39 per annum. All levies are indexed to the Harmonised Index of Consumer Prices (HICP), applied on an annual basis.

MAC260022

7 Proposed MAC Map (for illustration purposes only)

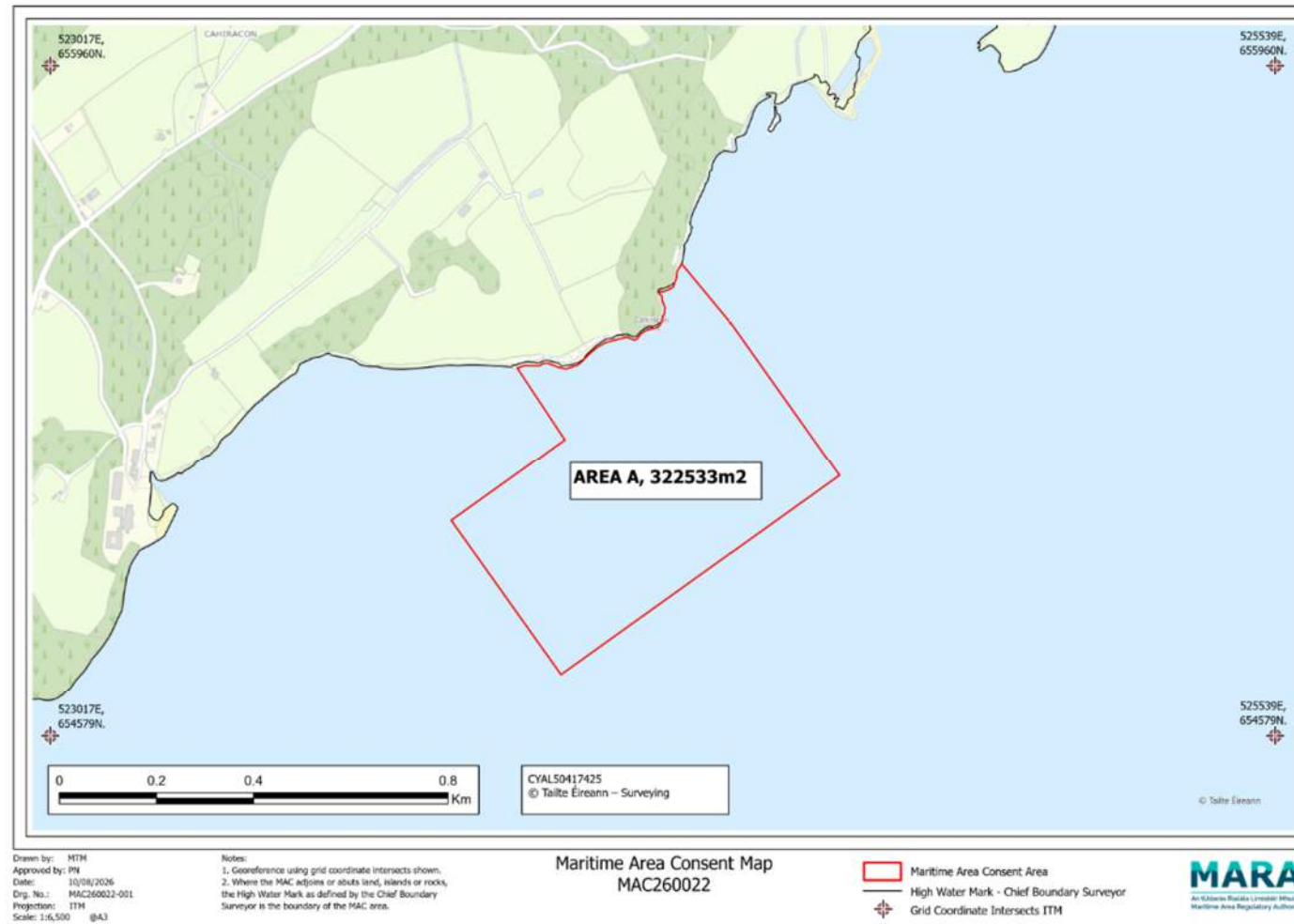


Figure 5 – Proposed MAC Map

8 Discussion

Based on the assessments undertaken contained herein, it is considered that the subject MAC application complies with all the necessary requirements of Schedule 5 of the Act, where relevant and appropriate, subject to the following recommended terms and conditions:

The proposed MAC area has been assessed to overlap private maritime area. Schedule 3(3) and Schedule 4(5) of the Act precludes “any maritime usage to the extent to which it is undertaken on a privately owned part of the maritime area” from requiring a MAC. Section 99(2) of the Act specifies that “no part of the maritime area shall be treated at any time as privately owned land unless the part is land whose owner is, or is deemed to be, registered under the Registration of Title Act 1964.” Accordingly, MARA may not consent to the sections of the proposed MAC area that are deemed to be privately held. Having regard to the above, it is recommended to part grant the proposed MAC for that portion of the maritime area which is in state ownership.

a. Terms

MAC Term:	24 Years
Consent Area:	That part of the maritime area marked red on the MAC Map.
MAC Map Title:	Maritime Area Consent Map MAC260022; Drawing Number MAC260022-001
Permitted Maritime Usage:	The construction, operation and maintenance of a jetty and associated infrastructure for the berthing of a Floating Storage and Regasification Unit (FSRU) at Cahiracon, Co. Clare, including decommissioning, demolition, rehabilitation, and any other works required on foot of any ministerial approval relating to the infrastructure.
Nature of Usage:	May or May Not be Exclusive
Date by which application for section 29 Development (Strategic Gas Reserve) Act 2026 approval must be submitted:	18 months from MAC Commencement Date.
The minimum number of days in which the MAC Holder shall provide the Grantor advance notice in writing of the Holder's	14 Days

**intention to commence the
Permitted Maritime Usage.**

b. Conditions and Reasons for Conditions

Section 82 of the Act specifies that MARA may attach to a MAC one or more conditions which fall within the types of conditions specified in Part 1 of Schedule 6 of the Act. All conditions contained in Schedule 6; Part 2 are deemed to be attached to a MAC.

The standard suite of MARA conditions reflecting the contractual and statutory relationship that will exist with a grant of consent are also recommended. Reasons for these conditions are set out in the enclosed section 81(7)(b) Minded to Notice.

9 Conclusion & Recommendation

Following a detailed assessment of all information on file, it is recommended to issue a section 81(7)(b) Minded to Notice, as enclosed, informing the Applicant that MARA is minded to part grant a Maritime Area Consent subject to the proposed conditions attached to the MAC. It is recommended to allow the Applicant a period of 21 days being a period reasonable in all the circumstances of the case from the date of issue of the Minded to Notice to submit supplementary material in relation to the reasons for the conditions as per section 81(7)(b)(ii).

Once a final determination is made by MARA, the Applicant(s) will be notified and MARA will publish a notice on its website as soon as practicable thereafter.

Signed: Paul Brennan Position: Manager, MAC Directorate

Signed: Philip Newell Position: Senior Marine Advisor, MAC Directorate