



September 18, 2026

licence@mara.ie

RE: MUL260049 – Uisce Éireann

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 Uisce Éireann. Uisce Éireann request a licence to conduct a survey to support a strategic modelling study of water currents along the Irish coast from Carlingford Lough to Kilcoole.

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

The MI advise that the proposed survey areas coincide with several fishing operations, including bottom trawling, dredging, pelagic fishing, and pots (the latter at the southern end of the survey area in Wicklow). The MI note that the sites overlap with 16 coastal Special Areas of Conservation (SACs), 13 Special Protection Areas (SPAs), the Skerries Islands Natural Heritage Areas (NHAs) and 4 shellfish water directive areas (see <https://atlas.marine.ie/> and <https://dafm-maps.marine.ie/aquaculture-viewer/>). The indicated areas are coincidental with spawning and nursery grounds of a range of commercial fish species including Cod, Herring, Haddock, Mackerel, Nephrops and Whiting.

The MI advise that there is potential for cumulative impacts between these and other survey activities that may be active in the vicinity and near timeframes.

BIM considers that the proposed surveys are temporary, low-impact scientific survey operations and are unlikely to result in significant adverse effects on aquaculture activities, inshore fisheries, bottom mussel seed fisheries, or razor clam fisheries.

Potential impacts are confined to short-term operational interactions associated with the deployment, presence and recovery of survey equipment and survey vessels.

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

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Accordingly, BIM raises no objection in principle to the proposed survey programme, subject to the following recommendations:

- Advance consultation with aquaculture licence holders and fishing license holders prior to each survey campaign.
- Issuing of Notice to Mariners and dissemination of accurate deployment coordinates.
- Avoidance, where practicable, of active aquaculture sites, known mussel seed beds, and areas of concentrated fishing effort.
- Prompt recovery of all deployed equipment at the completion of each survey period.
- Establishment of a point of contact for fishers and aquaculture operators to report any operational concerns during survey activities.

SFPA note that the proposed areas of investigations hold wild stocks of Live Bivalve Shellfish which are commercially harvested on an ongoing basis. However, there should be no issue for the SFPA to conduct official controls with the specified areas due to the nature of the equipment being temporarily deployed to the seabed.

Possible impacts to shellfish are the movement of the subsea devices which may be directly affected by dredging operations from the razor clam fishery which operate in water depths of 1-15m.

Due to the nature of the proposed equipment (ADCP) being deployed it is not envisaged by the SFPA, that there will be any impact on food safety while the environmental monitoring is taking place.

DAFM requests to be kept informed of the licence and any potential arising works, projects, or proposals, to minimise any impact to harbour, and aquaculture operations. DAFM requires that Irish water consult directly with DAFM through the harbourmaster as to the exact location and nature of any survey operations that are to take place near Howth Fishery Harbour Centre.

DAFM notes that a variety of fishing activities take place in and adjacent to the proposed site investigation areas, including fishing for razor clam and cockles. While vessels fishing those stocks are required to carry Vessel Monitoring Systems (VMS), there may be a lack of data concerning other fishing activities in and around the licence application area as VMS is generally not required currently for the majority of the vessels in the inshore fishing fleet. All such activities are therefore not routinely captured in official datasets. As set out by BIM in their observations, areas of concentrated fishing effort and known mussel seed beds should be avoided where practicable.

The applicant outlines that the proposed works will be temporary in nature, however, there is the potential for negative impacts on inshore fisheries. DAFM would request that all relevant fishing organisations are in receipt of the Notices to Mariners and are made aware of any proposed site survey and investigation works at the earliest opportunity. Relevant local fishing



organisations, including the North-East Regional Inshore Fisheries Forum (NERIFF), should be communicated with, to avoid any potential disruption.

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 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.

Please also find attached documents from the MI, BIM and SFPA which provide further comments for consideration.

Yours sincerely,

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food, and the Marine