

Date: 08/09/2026

To: Maritime Area Regulatory Authority

From: Francis O'Beirn, Marine Institute

Re: Request for Observations: MUL260049 Uisce Éireann - Marine environmental surveys for the purposes of site investigation.

Uisce Éireann has applied to MARA for a Maritime Usage License (MUL) to conduct a survey to support a strategic modelling study of water currents along the Irish coast from Carlingford Lough to Kilcoole. The proposed surveys are intended to support the design and consenting of wastewater infrastructure.

Within the 5-year licence duration the applicants will survey within 4 broad areas along the eastern seaboard.

The proposed works to be covered under this MUL are as follows:

- Deployment of up to fourteen (14) bottom mounted ADCPs. Additionally, four (4) vessel-mounted ADCP will be required for locations VADCP02, VADCP03, VADCP04 and VADCP05 (Attachment 3.5).
- Deployment of nine (9) tide gauges.
- Additional ancillary data will also be collected at the ADCP and tidal gauge locations such as conductivity, temperature and depth (CTD) measurements.
- Bathymetric surveys of the defined intertidal areas using either single beam & multibeam echosounders, or a combination of these technologies.
- Water quality sampling from the shoreline and from a vessel at multiple locations within each proposed licence area.

MI Observations:

It is the view of the Marine Institute (MI) surveys proposed are, for the most part, non-intrusive or of such as scale that they will not result in significant harm to the marine environment. The footprint of the static surveying equipment is very small and deployment and release will not result in any harm to the benthic communities upon which they are deployed or likely interfere with other users in the area.

Bathymetric sampling is being carried out at a number of inshore locations ranging in size from 245ha to 1456ha. It is noted in Section 2.6.3 in the SISAA document provided by the applicant¹, that the auditory range of cetaceans is outside the operating frequency of the proposed survey instrumentation and on this basis, no likely significant effects are considered on these qualifying interests. However, it is clear based on information provided on Table 4 (of the same report) that the operating frequency does overlap with high frequency cetaceans (including Harbour porpoise). This is an important species in this region and the primary Annex II qualifying interest of the Rockabill to Dalkey Island SAC. It would be important that the basis of exclusion from AA, relating to interactions between proposed bathymetric surveying and Annex II qualifying interests, be carefully considered in deliberations.

The proposed site investigation methods are relatively standard and have been used in similar investigations in Irish waters and internationally. It is noted that there are no bird monitoring or

¹ 19/062 - WO064 Marine Modelling Studies - Lot 1 Greater Dublin & Northeast Region Supporting Information for Screening of Appropriate Assessment Uisce Éireann August 2026

investigations proposed for the area in question. Is this an oversight or do the applicants consider there are sufficient data to inform this subject area during subsequent licensing deliberations?

There are 38 licenced aquaculture sites within the proposed site investigation areas. All of these 38 sites are located within Carlingford Lough and are included in Lot 1 - Proposed Licence area A. There is a single water quality sampling station proposed at Greer's Quay in Carlingford Lough, which will have no likely interactions with aquaculture activities. There are no other proposed sampling events planned for the lough. On this basis, impacts on aquaculture are not considered likely.

The proposed site investigation areas do overlap with Classified Bivalve Mollusc Production Areas (Carlingford Lough, Dundalk Bay, Skerries, Gormanstown and Malahide) and the Carlingford, Dundalk, Balbriggan/Skerries and Malahide Shellfish Waters Directive Area - <https://dafm-maps.marine.ie/aquaculture-viewer/>. Carlingford is designated for production of mussels and Pacific oysters. All other areas are designated for the fishing/production of razor clams. Assuming all safety measures are fully implemented and risk mitigated (e.g., risk of oil spill is considered negligible), it is unlikely the proposed activities will have any impact on the current status of these protected areas.

There is other commercial fishing activity within the proposed site investigation area in the maritime area and therefore, some interaction with fishing activity may occur.

We draw MARA's attention to fishery risk assessments relating to Natura Qualifying interests that have been carried out nationally and more specifically, on the east coast. These reports can be found at the following link and give an indication of likely fisheries activities occurring in the area in question.

<http://www.fishingnet.ie/sea-fisheriesinnaturaareas/concludedassessments/>

If a subsequent AA screening concludes that likely significant effects among conservation features (e.g., marine mammals) and the proposed activities cannot be excluded, there are a number of measures that might be applied to minimise risk. Foremost among these is the use of marine mammal observers (MMO) during bathymetric surveying operations including the adoption of a 'soft start' protocol. The NPWS guidance on this subject is an appropriate reference². The MI is satisfied that adoption of such measures will mitigate any risk to marine mammals during the site investigations.

Furthermore, in light of the intensive nature of the methodologies proposed and the extensive nature of the coverage, the MI believe it would be important that MARA consider the cumulative effects of these activities in light of the location and timing of similar activities along the East Coast (and other locations further afield) and consider the likely longer term effects on marine mammals, birds and other biota, if any, and how these effects might be measured?

On a broader note, the MI advises MARA that similar data gathering surveys be carried out in a co-ordinated fashion in order to avoid redundancy of effort and minimise disturbance while also broadening spatial and temporal extent of the baseline of information on habitats and species, in particular. In addition, having these baseline data will facilitate future assessment of impacts of developments beyond the footprint of the licence/lease area. The extension of ecological surveying (e.g. fisheries, CPOD and bird surveying?) beyond the footprint of the maritime usage licence application area might also be considered?

² Dept of Arts Heritage and the Gaeltacht. 2014. Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters. January 2014 58pp [Underwater sound guidance Jan 2014.pdf](#)