Maritime Usage Licensing and Planning Advisory Directorate Maritime Usage Licence Assessment Report					
To:	John Evans, Director	**From:**		Tom Manning, Ross Fitzgerald Marine Analysts	
Date:	05/11/2026	**Maritime Usage Licence Application Reference No:**		MUL260049	
MUL Applicant Name:		Uisce Éireann			
MUL Applicant Registered Address:		Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86.			
Licence application received:		19/08/2026			
Type of maritime usage in accordance with Schedule 7 of the Maritime Area Planning Act 2021:		3. Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000.			
Location of proposed maritime usages:		The Irish Sea from Carlingford Lough, Co. Louth to Kilcoole, Co. Wicklow.			
Environmental Impact Assessment (EIA) Screening		EIA not required (EIA Screening Form dated 30/10/2026)			
1st request for additional information (RAI) issued:		08/09/2026	Response to 1st RAI received		29/09/2026
2nd RAI issued:		22/09/2026	Response to 2nd RAI received		06/10/2026
Appropriate Assessment (AA) Screening		AA Screening and Determination Report dated 30/10/2026			
Public body consultation:		20/08/2026 – 24/10/2026	**Observations from public bodies received:**		Ten

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1. Background

Uisce Éireann (the applicant) has applied to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence (MUL) to undertake marine environmental surveys for the purposes of site investigations, falling under Schedule 7(3) of the Maritime Area Planning Act 2021 as amended (the MAP Act). The proposed site investigations are required for the calibration of hydrodynamic and water quality models in support of essential wastewater infrastructure along the Irish East coast. The proposed maritime usage area is referred to in the application as *Marine Modelling Studies - Lot 1 Greater Dublin & Northeast Region*.

2. Location and Description of the Proposed Maritime Usage

The oceanographic and geophysical data collected during the proposed maritime usage will facilitate the strategic modelling of water currents within proposed maritime usage areas A-D from Carlingford Lough, south to Wicklow Head (see Figure 1).

The site investigation survey methods include deployment of Acoustic Doppler Current Profilers (ADCPs), placement and recovery of tide gauges, CTD monitoring equipment and water quality sampling. The proposed bathymetrical surveys are located within discrete areas of the overall maritime usage area. The individual areas proposed for bathymetry data collection work comprise parts of Areas B, C and D at Skerries, Broadwater Meadow, Malahide Harbour, Malahide Bay, Shanganagh and Greystones.

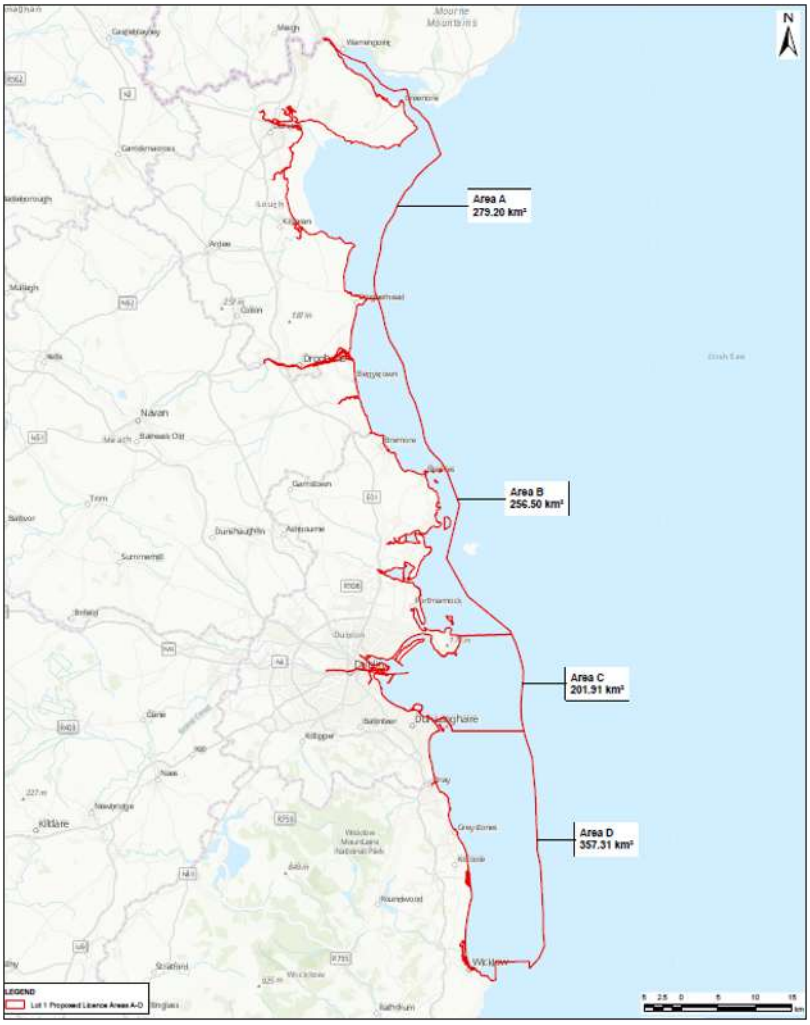


Figure 1. Location of the proposed maritime usage (applicants map).

The details of the proposed site investigations are shown below in Table 1.

Table 1. Details of the proposed site investigations

Site investigation	Proposed methodology and quantities
Acoustic Doppler Current Profilers (ADCP)	Deployment and recovery of 14 bottom mounted ADCPs. ADCPs have an operating frequency between 200 kHz to 500 kHz. deployed from the vessel's deck onto the seabed. Four additional vessel-mounted ADCPs are proposed for data collection purposes.
Geophysical surveys	Bathymetric surveys using single beam & multibeam echosounders with operating frequencies between 200-700 kHz for MBES and an operational frequency of 200 kHz for SBES.
Tide gauges	Deployment of nine tide gauges mounted on existing fixed structures, quaysides or navigation markers.

Oceanographic and other surveys	Conductivity, temperature and depth (CTD) measurements collected at ADCP and tidal gauge locations. Water quality sampling from the shoreline and from a vessel at multiple locations within each proposed licence area using handheld Niskin bottles or sondes.

The proposed survey duration is for a maximum of 60 days and is expected to utilise two survey vessels. The ADCPs will be left in place on the seabed for a minimum of 35 days and a maximum of 60 days. The tide gauges will be in place for 35 concurrent days. A five-year licence is sought to provide for survey scheduling contingencies.

2.1 Brief description of the site characteristics

The proposed maritime usage area stretches for approximately 130km along the east coast of Ireland, extending offshore to a distance of 15km at the widest point at Dundalk Bay in the north to 600m in the south along the County Wicklow coastline. The total proposed maritime usage area covers 109,537ha. The proposed maritime usage area is divided into 4 contiguous survey areas. Area A includes the southern portion of Carlingford Lough, Dundalk Bay and the coast of Louth south to Clogherhead Point; Area B encompasses the Boyne Estuary, the coast of Louth, Meath and north county Dublin down to Howth Harbour, excluding the islands off the Dublin coast; Area C includes the north and south of Dublin Bay down to Dalkey Islands SPA and; Area D covers the South Dublin and the Wicklow coastline south to Wicklow Head.

The broadscale coastal habitats within the MUL application area are large shallow inlets and bays, estuaries, mudflats and sandflats, coastal lagoons, beaches and rocky shores. Broadscale benthic soft sediment habitats within the proposed MUL area include infralittoral and circalittoral coarse, sand, mixed and mud sediments. Hard substrate rocky and subtidal cobble reefs likely to be present around offshore islands along the Dublin coast and at the southern area of the MUL application boundary. Water depths range from 0 - > 50 m, with low to moderate current energy.

3. Assessment

In assessing a MUL application, MARA must have regard to the criteria specified in the MAP Act, as discussed in this section.

3.1 National Marine Planning Framework (NMPF)

MARA must have regard to the Marine Planning Policy Statement (MPPS) which outlines the government's overarching vision, policies, and principles for managing the country's maritime area. MARA must also have regard to the NMPF, which sets the framework for implementing the forward planning component of our marine planning system as set out in the MPPS. A number of environmental and sectoral activity policies detailed in the NMPF are covered in other sections of this report, including, but not limited to, the National Biodiversity Action

Plan (NBAP), the Birds and Habitat Directives, the Water Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD) and Consideration of other maritime users.

The applicant notes that the proposed maritime usage is connected with the provision of essential wastewater infrastructure to facilitate community growth and housing provision. In this regard the proposed maritime usage supports the relevant national housing and infrastructure policies and the relevant objectives to ensure wastewater systems can accommodate planned housing and population growth in a sustainable manner. The proposed maritime usage provides for the development of water quality models and is also in line with the policy objectives of the NMPF (specifically the objectives of Chapter 24: *Wastewater Treatment and Disposal* and the policies therein). The proposed maritime usage is therefore considered to be compliant with the overall objectives and policies of the NMPF.

Underwater Cultural Heritage.

The NMPF includes a policy on Heritage Assets, which supports the conservation of the historic environment and heritage assets both along the coast and in the underwater environment. The policy notes that proposals not specifically contributing to enhancing cultural heritage assets must demonstrate that they avoid, minimise or mitigate against harm to heritage assets. The applicant notes that the proposed bathymetric surveys are not expected to have any interaction with the seabed, and states that ADCPs will not be placed on or near any shipwrecks.

It is recommended that a condition be included in the Proposed Licence, if granted, requiring the Holder to consult with the Underwater Archaeology Unit of the Department of Housing, Local Government and Heritage prior to the commencement of the activities and to comply with their requirements in relation to underwater cultural heritage.

3.2 Environmental Impact Assessment Directive (2014/52/EU) (EIA Directive)

MARA carried out a screening for EIA of the proposed maritime usage having considered Schedules 5 and 7 of the Planning and Development Regulations 2001. An EIA Screening Form was issued by MARA on 30/10/2026 and it was concluded that the activities do not fall within the scope of the EIA Directive and therefore an EIA is not required.

3.3 National Biodiversity Action Plan (NBAP)

Ireland's 4th National Biodiversity Action Plan sets the national biodiversity agenda for the period 2023–2030. The objectives of the NBAP focus on the conservation and restoration of biodiversity. The proposed maritime usage is considered to be consistent with the objectives of the NBAP to protect, conserve and restore marine biodiversity and is not expected to give rise to significant adverse effects on habitats and species within the Irish Sea region. Objective 2 of the NBAP is to meet urgent conservation and restoration needs. Part of its focus is to

elevate efforts to tackle invasive alien species. It is recommended that a condition be included in the Proposed Licence, if granted, to address the potential risks from invasive alien species as a result of the proposed maritime usage. Sections 3.5–3.8 of this report also address the Habitats and Birds Directives, WFD and MSFD and recommend conditions to be included in the Proposed Licence, if granted, to minimise impacts on biodiversity from the proposed maritime usage.

3.4 Climate Action and Low Carbon Development Act 2015, as amended

Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended (the 'Climate Act') requires relevant bodies, including MARA, to perform their functions in so far as practicable in a manner consistent with the governance framework set out therein. Considering the temporary nature of the proposed activities, no significant increases in carbon emissions are expected to be produced.

3.5 Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) requires EU member states to protect and improve water quality in all waters to achieve at least good ecological status in inland surface waters, transitional waters, coastal waters and groundwater by 2027, at the latest. The ecological status of coastal and transitional waterbodies is based on the assessment of biological quality elements (phytoplankton, benthic invertebrates, macroalgae, angiosperms and fish[1]) as well as supporting chemical (specific pollutants), physico-chemical (e.g. temperature, salinity, nutrients) and hydromorphological quality elements. The proposed maritime usage will take place in a number of waterbodies, as outlined in Table 2.

[1] Fish are a biological quality element of transitional waterbodies

Table 2: Water Framework Directive waterbodies in relation to the proposed maritime usage area from the reporting period 2019–2024, including status, risk and significant pressures for the at-risk[2] waterbodies[3].

Waterbody name & code	Waterbody type	Ecological status & Risk	WFD significant pressures
Knocknagoran IE_NB_06K250770	River	Good & under review	N/A
Raskeagh UKGBNI1NB060608251	River	Moderate & under review	N/A
Castletown IE_NB_06C010310	River	Good & not at risk	Agriculture, urban run-off
Ramparts IE_NB_06R010300	River	Poor & under review	N/A
Palmerstown IE_EA_08P030930	River	Poor & under review	N/A
Ballough Stream IE_EA_08B031600	River	Moderate & at risk	Agriculture, urban wastewater
Ballyboghil IE_EA_08B012200	River	Poor & at risk	Agriculture, urban wastewater
Royal Canal Main Line (Liffey and Dublin Bay) IE_09_AWB_RCMLE	River	Good & under review	N/A
Dodder IE_EA_09D010900	River, Heavily Modified Water Body (HMWB)	Moderate & at risk	Urban wastewater, urban run-off, other unknown
Dargle IE_EA_10D010300	River	Good & not at risk	N/A
Vartry IE_EA_10V010300	River, Heavily Modified Water Body (HMWB)	Good & not at risk	N/A
Newry Estuary NB_030_0100	Transitional, Heavily Modified Water Body (HMWB)	Unassigned & under review	N/A
Ballymascanlan Estuary IE_NB_040_0300	Transitional	Moderate & under review	N/A
Castletown Estuary IE_NB_040_0200	Transitional	Bad & at risk	Urban wastewater
Inner Dundalk Bay IE_NB_040_0100	Transitional	Poor & at risk	Urban wastewater

[2] At risk means at risk of not achieving good status by 2027; not at risk means no risk in maintaining current status.

[3] From www.catchments.ie

Fane Estuary IE_NB_040_0400	Transitional	Moderate & at risk	N/A
Glyde Estuary IE_NB_040_0500	Transitional	Moderate & under review	N/A
Boyne Estuary IE_EA_010_0100	Transitional	Poor & at risk	Urban wastewater, agriculture
Nanny Estuary IE_EA_030_0100	Transitional	Moderate & under review	N/A
Rogerstown Estuary IE_EA_050_0100	Transitional	Poor & at risk	Agriculture, domestic wastewater
Broadmeadow Water IE_EA_060_0100	Transitional, Heavily Modified Water Body (HMWB)	Moderate & at risk	Urban wastewater, domestic wastewater
Mayne Estuary IE_EA_080_0100	Transitional	Moderate & under review	N/A
North Bull Island IE_EA_090_0100	Transitional	Moderate & under review	N/A
Tolka Estuary IE_EA_090_0200	Transitional	Poor & at risk	Urban wastewater
Liffey Estuary Upper IE_EA_090_0400	Transitional	Moderate & under review	N/A
Liffey Estuary Lower IE_EA_090_0300	Transitional, Heavily Modified Water Body (HMWB)	Moderate & at risk	Urban wastewater
Dargle Estuary IE_EA_110_0100	Transitional	Moderate & under review	N/A
Kilcoole Marsh IE_EA_120_0100	Transitional	Moderate & at risk	N/A
Broad Lough IE_EA_130_0100	Transitional	Moderate & at risk	Urban run-off, agriculture
Carlingford Lough GBNIIE6NB030	Coastal	Unassigned & under review	N/A
Mourne Coast GBNIIE6NB020	Coastal	Unassigned & under review	N/A
Outer Dundalk Bay IE_NB_040_0000	Coastal	High & not at risk	N/A
Louth Coast (HA 06) IE_NB_025_0000	Coastal	High & not at risk	N/A
Boyne Estuary Plume Zone IE_EA_010_0000	Coastal	Moderate & at risk	Other unknown, urban run-off

Northwestern Irish Sea (HA 08) IE_EA_020_0000	Coastal	Good & at risk	Unknown
Malahide Bay IE_EA_060_0000	Coastal	Moderate & at risk	Urban wastewater
Irish Sea Dublin (HA 09) IE_EA_070_0000	Coastal	Good & not at risk	N/A
Dublin Bay IE_EA_090_0000	Coastal	Good & not at risk	N/A
Irish Sea Dublin (HA 09) IE_EA_070_0000	Coastal	Good & not at risk	N/A
Southwestern Irish Sea - Killiney Bay (HA10) IE_EA_100_0000	Coastal	Good & not at risk	N/A

The proposed activities may result in minor, localised disturbance to seabed sediments and very small, short-lived increases in suspended sediment concentrations in the immediate vicinity of the ADCP deployment and recovery works. Given the scale and nature of the surveys, any disturbance to the seabed or water column will be temporary and rapidly reversed, with no potential to result in measurable changes to water quality or benthic conditions at the scale of the relevant water bodies. The proposed activities may also result in a temporary displacement of benthic invertebrates and fish, through deployment of ADCPs, or during the bathymetric surveys. However, given the geographical and temporal extent of the proposed activities, it is expected that any displaced benthic communities and fish will rapidly recolonize the area once works are complete.

There is a possibility that fuel or oil spills from survey vessels may cause a negative impact on water quality and WFD Status. The Proposed Licence, if granted, has a condition requiring the Holder to have an oil pollution emergency plan in place in the event of an accident. The applicant has also stated that mitigation measures will be implemented outlined further mitigation measures to lessen the risk of fuel or oil spills to from the survey vessels. The Proposed Licence, if granted, has a condition stating that the Permitted Maritime Usage shall be carried out in accordance with the plans and particulars submitted in support of the MUL application. There is also the risk of introduction of invasive marine species via the vessels or equipment proposed to be used, which may impact the WFD biological quality elements. It is recommended that a condition be included in the Proposed Licence, if granted, to address the potential risks from invasive alien species as a result of the proposed maritime usage.

Considering the baseline conditions of the receiving environment and having regard to the scale, nature and duration of the proposed maritime usage, along with the recommended conditions as included in the Proposed Licence, if granted, it is concluded that the proposed maritime usage will not result in the deterioration of the ecological status of any WFD

waterbody. The works are therefore compliant with the requirements and objectives of the Water Framework Directive.

3.6 Marine Strategy Framework Directive (2008/56/EC)

The Marine Strategy Framework Directive (MSFD) sets the framework for European marine environmental policy. It aims to achieve Good Environmental Status (GES) for all marine waters in Europe and protect the resource base for marine related economic and social activities. Ireland's 2024 assessment[4] under Article 8 of the MFSD sets out the status of the 11 qualitative descriptors that describe the state of the marine environment. Table 4 sets out the status of the relevant descriptors and assesses the potential impacts of the proposed maritime usage.

[4] Ireland's Marine Strategy Part 1: Article 8, 9 and 10 report 2024.

Table 3: Assessment of impact of proposed maritime usage on MSFD descriptors

MFSD Descriptor	Good Environmental Status achieved	Assessment
Biological diversity	Partially achieved	MARA has undertaken a screening for AA in respect to the proposed maritime usage and an assessment of impact on Annex IV species. The proposed maritime usage will have no impact on species populations, habitats or ecological functioning within the Irish Sea region. There is potential for small scale, temporary seabed disturbance and temporary increases in suspended sediments during ADCP deployment and recovery, however there will be no disruption to ecosystem processes due to any potential impacts being localised, temporary and reversible.
Non-indigenous species	Yes	To ensure that the proposed maritime usage will not result in the unintended introduction of non-indigenous species, a condition is recommended to be included in the Proposed Licence, if granted, relating to the control of invasive species.
Population of commercial fish/shellfish	Partially achieved	This assessment of GES is based on whether stocks are being fished at or below the maximum sustainable yield (MSY) and whether spawning stock biomass is above the level that can produce MSY. The proposed maritime usage area is within spawning and nursery grounds for a variety of fish and shellfish species. However, due to the small scale and temporary duration of potential impacts on the benthic environment, the proposed maritime usage would not be capable of causing significant disturbance to spawning and nursery grounds for fish species and there is not expected to be an impact on this descriptor from the proposed activities.
Marine food webs	Unclear	The balance and diversity in marine food webs is not expected be impacted as a result of the proposed maritime usage.

Eutrophication	Yes	The proposed maritime usage does not involve the addition of nutrients to the marine environment and as such, will not impact this descriptor achieving GES.
Sea-floor integrity	Partially achieved	The seabed habitat within the proposed maritime usage area will experience temporary disturbance due to the deployment and recovery of ADCPs. Localised seabed disturbance will be temporary, spatially limited, and reversible and seabed habitat conditions are expected to return to normal levels relatively quickly and increases in suspended sediments would be temporary. It is therefore not expected that the proposed maritime usage will negatively impact on the GES status of this descriptor.
Alteration of hydrographical conditions	Yes	The proposed maritime usage will not alter the hydrographical conditions (e.g. changes in wave action, currents, salinity, temperature) in the proposed maritime usage area and there will be no impact on the GES status of this descriptor.
Concentrations of contaminants	Yes	The proposed maritime usage is not expected to introduce contaminants into the receiving waters of the Irish Sea. Any potential risk from concentrations of contaminants relates to accidental pollution spills, such as hydrocarbon spills from the survey vessels. There is a very low risk of accidental pollution, and the applicant has stated that mitigation measures will be implemented to lessen the risk of fuel or oil spills from the survey vessels. The Proposed Licence, if granted, has a condition stating that the Permitted Maritime Usage shall be carried out in accordance with the plans and particulars submitted in support of the MUL application. To further mitigate this risk, it is recommended that the Proposed Licence, if granted, includes a condition requiring the Holder to ensure that there is an oil pollution emergency plan on board any survey vessels engaged in the proposed maritime usage.
Contaminants in fish/seafood for human consumption	Yes	The proposed maritime usage will not introduce contaminants in fish or seafood. While there is an overlap between the proposed maritime usage area and several licensed aquaculture sites in Carlingford Lough, the only activity proposed to take place in Carlingford Lough is a water quality

		sample in the vicinity of Greer's Quay, near Omeath, Co. Louth. Thus, there will be no impact on the achievement of GES status of this descriptor.
Marine Litter	No	The proposed maritime usage will not result in the introduction of marine litter to the marine environment and thus will not impact on the achievement of GES status of this descriptor. The Proposed Licence, if granted, includes a general condition requiring the Holder to remove all plant and equipment associated with the activities and to restore the licenced area to its original condition.
Introduction of energy including underwater noise	Yes	The proposed maritime usage will result in the introduction of underwater noise. The applicant indicates that for the bathymetry surveys, industry standard operating frequencies will be used, typically ranging from 200-700 kHz for MBES and 200 kHz for SBES. These high frequencies are outside the hearing ranges of most marine mammals, fish and birds. In addition, the MBES and SBES surveys will only be conducted in shallow water. In this case, the fan of insonification will be very narrow and will dissipate quickly. Given the temporary, localised nature of the proposed activities and equipment, it is not anticipated that significant underwater noise will be introduced into the environment as a result of the proposed maritime usage. However, given the known records of cetaceans in the Irish Sea, it is recommended that as a precautionary measure, a condition relating to management of underwater noise disturbance in relation to marine mammals, and in line with National Guidance, be included in the Proposed Licence, if granted. In order to inform the data collected as part of MSFD requirements, a condition has been included in the Proposed Licence, if granted, requiring the Holder to provide details of all acoustic surveys to the Marine Environment Section of the relevant government department in the reporting format of the OSPAR Impulsive Noise Registry.

3.7 Annex IV species

Articles 12 and 13 of the Habitats Directive (92/43/EC) impose obligations on Member States to establish a system of strict protection for animal and plant species listed on Annex IV of the Directive. The applicant submitted a Risk Assessment for Annex IV Species (RAAIVS) report in support of the application and in line with national guidance on underwater noise[5]. The risk assessment considered the scope of the proposed maritime usage and assessed baseline conditions in relation to the relevant Annex IV species (cetaceans, sea turtles, otters, bats). Although not listed on Annex IV of the Directive, seals and basking shark were also included. Following an initial assessment, sea turtles, otter, bats (and basking sharks) were excluded by the applicant from further assessment due to the low likelihood of significant impacts on these species from the proposed activities.

The applicant further assessed the potential impacts of the proposed maritime usage on cetaceans (and pinnipeds) in relation to underwater noise (from survey activities and vessel engine noise) and collision risk. Given the published marine mammal hearing ranges and the expected operational frequencies of the proposed bathymetry and ADCP equipment (>200kHz), along with the fact that MBES and SBES surveys will only be conducted in shallow water (where the fan of insonification will be very narrow and will dissipate quickly), and taking into account the short-term nature of any proposed vessel use, we agree with the applicant's conclusion that the proposed activities will not cause auditory injury or disturbance or a significant collision risk to Annex IV cetacean species. However, as a precaution, it is recommended that a condition relating to management of underwater noise disturbance in relation to marine mammals, be included in the Proposed Licence, if granted.

The applicant has stated that a derogation licence from the National Parks and Wildlife Service (NPWS) under the (Birds and Natural Habitats) Regulations 2011 as amended, is not required for the proposed maritime usage.

3.8 Appropriate Assessment Screening

The Habitats Directive (92/43/EC) and the Birds Directive (2009/147/EC) are transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011, as amended (the Regulations) and by Part XAB of the Planning and Development Act 2000. The application was subject to screening for appropriate assessment (AA) by MARA in accordance with the Regulations. MARA made an Appropriate Assessment (AA) Screening Determination on 30/10/2026 which concluded that the proposed maritime usage will not require Stage 2 AA as it could be excluded, on the basis of objective scientific information, that the proposed

[5] https://www.npws.ie/sites/default/files/general/Underwater%20sound%20guidance_Jan%202014.pdf

project, either individually or in-combination with other plans or projects, will have a significant effect on European sites.

4. Consideration of other maritime users

MARA has had regard to the rights of other users as set out in Section 3 (3)(b) of the MAP Act. The proposed maritime usage area spans a wide portion of the east and northeast coasts, overlapping with a variety of other maritime users.

The applicant has stated that the proposed maritime usage, including the deployment of survey equipment, will not require access to public areas (including beaches) for deployment or operation. The proposed maritime usage area overlaps with several bathing water areas, however, due to the short-term and temporary nature of the surveys, disturbance to the public using such bathing waters is expected to be minimal.

The proposed maritime usage area overlaps with several commercial fisheries along the east coast and a number of licensed aquaculture sites in Carlingford Lough. However, the only proposed activity in Carlingford Lough is a water quality sample in the vicinity of Greer's Quay and there will be no impact on adjacent licensed sites as a result. The applicant has provided an assessment of the overlap between the proposed maritime usage and fishing activity, with dredge and pot fisheries most likely to be affected. The applicant notes that there is the potential risk of damage to static fishing gear along with risk of entanglement with deployed survey equipment. It is recommended that conditions be included in the Proposed Licence, if granted, in respect of the requirement to publish a marine notice via the Marine Safety Division of the Department of Transport, prior to the commencement of activities and the requirement to appoint a Fisheries Liaison Officer (FLO).

There are several commercial ports, shipping routes and widespread recreational activities within the proposed maritime usage area. The potential effects on marine traffic include an increased risk of disruption to shipping traffic or collision with the survey vessels while carrying out bathymetry surveys, water sampling or ADCP operations. It is recommended that conditions be included in the Proposed Licence, if granted, in respect of the requirement to publish a marine notice via the Marine Safety Division of the Department of Transport, prior to the commencement of activities and for the Holder to consult with the relevant Port Companies, Local Authorities or Harbour Masters.

The proposed maritime area contains several known international submarine cables. It would be important that the applicant not damage or interfere in any way with this existing consented third-party infrastructure (for example, if a grapple run was required to retrieve an ADCP unit). It is recommended to include a condition in the Proposed Licence, if granted, in respect of the need for the Holder not to damage or interfere with any third party's property while carrying out the Permitted Maritime Usage.

5. Site visit

A site visit was not undertaken due to the large spatial scope of the proposed maritime usage.

6. Public body consultation

Observations on the MUL application were invited from relevant public bodies to ensure that MARA takes account of all other relevant maritime usages and interests in the application area. Ten responses were received. The following tables summarise the observations from public bodies with a response given below each submission summary. The MARA website should be consulted to view the full details of the observations received.

1. Observations summary – Dept Agriculture, Food & Marine (DAFM)
Observations were received on 20/08/2026 from DAFM. DAFM notes that Area B of the proposed maritime usage area is in close proximity to Howth Fishery Harbour Centre and requests confirmation that the Fishery Harbour Centre boundary is taken into account in the application.

MARA Response:

MARA can confirm that the applicant has not included the Howth Fishery Harbour Centre within the proposed maritime usage area, and a condition is recommended to be included in the Proposed Licence, if granted, for consultation with the Harbour Master at Howth Fishery Harbour Centre.

2. Observations summary – Marine Institute (MI)
Two observations were received on 26/08/2026 and 08/09/2026 from the Marine Institute. The observation of 26/08/2026 notes that the proposed site investigations coincide with Dublin Port activities, commercial fishing activity, designated sites and spawning and nursery grounds of commercial fish species and that there is potential for cumulative impacts between these and other survey activities that may be active in the vicinity of the proposed site investigations. In the observation of 08/09/2026 the MI refers to information provided by the applicant, indicating that the operating frequency overlaps with high frequency cetaceans (including Harbour porpoise) and that the basis of exclusion from AA, relating to interactions between proposed bathymetric surveying and Annex II qualifying interests, be carefully considered.

MARA response:

In relation to the observation of 26/08/2026, it is considered that the proposed maritime usage will be of a small scale, low intensity and short duration within the survey areas and

would not be likely to cause significant effects on marine habitats or species, even when considered in combination with other plans and projects. Benthic habitats will recover rapidly following ADCP deployment and on the basis of the small areas potentially affected by any benthic disturbance. The applicant indicates that for the bathymetry surveys, industry standard operating frequencies will be used, typically ranging from 200-700 kHz for MBES and 200 kHz for SBES. These high frequencies are outside the hearing ranges of most fish. Therefore, the proposed maritime usage would not be capable of having significant impacts on spawning and nursery grounds of commercial fish species populations. It is recommended that conditions be included in the Proposed Licence, if granted, in respect of the requirement to publish a marine notice via the Marine Safety Division of the Department of Transport, and for the Holder to consult with the relevant Port Companies, Local Authorities or Harbour Masters. The appointment of a Fisheries Liaison Officer (FLO) is also recommended as a condition of the Proposed License, if granted.

In relation to the observation of 08/09/2026, MARA concurs with the information within the SISAA report submitted by the applicant that the hearing range of marine mammals would be outside the operating frequency of the geophysical equipment proposed to be deployed. However, as a precaution, it is recommended that a condition relating to management of underwater noise disturbance in relation to marine mammals, be included in the Proposed Licence, if granted.

3. Observations summary – Bord Iascaigh Mhara (BIM)
Observations were received on 03/09/2026 from BIM. BIM recommends advance consultation with aquaculture licence holders and fishing licence holders, a Notice to Mariners with deployment coordinates, the avoidance of active aquaculture sites and areas of fishing effort, the recovery of all deployed equipment at the completion of each survey period and the provision of a point of contact for fishers and aquaculture operators to report any operational concerns during the proposed maritime usage.

MARA Response:

MARA notes the observations of BIM. It is recommended to include a condition in the Proposed Licence, if granted, in respect of the need for the Holder not to damage or interfere with any third party's property while carrying out the Permitted Maritime Usage, and to publish a marine notice via the Marine Safety Division of the Department of Transport, in support of the principle of coexistence of marine users. The appointment of a FLO is also recommended as a condition of the Proposed License, if granted, as is a condition requiring the Holder to remove all equipment used in connection with the Permitted Maritime Usage from the Licensed Area and to restore the Licensed Area to the condition it was prior to the commencement of the Permitted Maritime Usage.

4. Observations summary – Sea Fisheries Protection Authority (SFPA)
Observations were received on 26/08/2026 from the SFPA, noting that the proposed licence area overlaps with several commercial fisheries. The SFPA notes that the ADCP devices may be directly affected by dredging operations from the razor clam fishery. They also state that there will be no issue for the SFPA to conduct official controls within the specified areas due to the nature of the equipment being temporarily deployed to the seabed and similarly, there will be no impact on food safety.

MARA Response:

MARA notes the reference in the SFPA observation in relation to a razor clam fishery in the Irish Sea. As it is considered that there could be interaction between the placement of ADCPs on the seabed and the activities of fishers, conditions are recommended for inclusion in the Proposed License, if granted, with regard to the publication of a Marine Notice via the Marine Safety Division of the Department of Transport and the appointment of a FLO.

5. Observations summary – Inland Fisheries Ireland (IFI)
Observations were received on 10/09/2026 from IFI, which stated that the body has no comment to make in relation to this application.

MARA Response:

MARA notes the observations of IFI.

6. Observations summary – Dept Transport (Marine Survey Office MSO)
Observations were received on 09/09/2026 from the MSO. The MSO noted that the application documentation did not consider NMPF Chapters 18 or 19, or the safety of other maritime users and the safety of the project personnel engaged during the proposed deployment of MBES equipment and survey data acquisition.

MARA Response:

MARA received an RAI response from the applicant in relation to Chapters 18 and 19 of the National Marine Planning Framework and ensuring the safety of maritime users. The regulation of the safety of project personnel is not part of MARAs remit.

7. Observations summary – Development Applications Unit of the Department of Housing, Local Government and Heritage (DHLGH)
Observations were received on 18/09/2026 from DHLGH. DHLGH noted that the proposed works are temporary and non-invasive and that the hearing range of relevant marine mammals is outside of the operating frequency of the marine surveys. It was also noted that no cumulative or in-combination effects are anticipated. DHLGH recommended

compliance with Marine Mammal Observer protocol (NPWS, 2014) during any vessel-based work as appropriate: Guidance to Manage the Risk to Marine Mammals from Manmade Sound Sources in Irish Waters (NPWS, 2014) and retrieval of all equipment upon completion of surveys. In relation to Underwater Archaeology, the National Monuments Service (NMS) recommended implementation of statutory protections for Underwater Cultural Heritage (e.g. appointment of project archaeologist and Protocol for Archaeological Discoveries).

MARA Response:

A condition is included in the Proposed Licence, if granted, requiring compliance with the Marine Mammal Observer protocol and Guidance to Manage the Risk to Marine Mammals from Manmade Sound Sources in Irish Waters (NPWS, 2014). A condition is also included in the Proposed Licence, if granted, for consultation with the NMS of DHLGH in relation to Underwater Cultural Heritage prior to commencement of the proposed maritime usage.

8. Observations summary – Louth County Council
Observations were received on 28/09/2026 from Louth County Council stating that they had no comment on the proposed maritime usage.

MARA Response:

MARA notes the observation from Louth County Council.

9. Observations summary – Commissioners for Irish Lights (CIL)
A submission was received on 05/10/2026 from CIL, stating that some of the proposed ADCP would need IALA compliant surface marker buoys, or may require repositioning due to potential navigational risks. CIL also note that any AA (or AA screening) should consider the potential impact of deployment of any surface marking buoys and associated moorings which may be required as part of the project.

MARA Response:

MARA notes the submission of CIL. The onus is on the applicant to ensure that all the required statutory consents are in place in order for the proposed maritime usage to proceed and this is specified as a standard condition of all MULs. Prior to the commencement of the deployment of survey equipment, the applicant must be in receipt of any relevant consents required from CIL. All aspects of the proposed application submitted to MARA were considered as part of the Appropriate Assessment screening determination.

10. Observations summary – Department of Agriculture, Environment and Rural Affairs (DAERA), Northern Ireland
A submission was received on 27/10/2026 from DAERA, stating that as no part of the proposed maritime usage will be within Northern Irish waters, DAERA would not require a marine licence be applied for through its process. DAERA note that if this was to change, it would request the applicant contact them directly to apply for a marine licence for any work proposed to take place within Northern Ireland's marine area.

MARA Response:

MARA notes the submission of DAERA. The proposed maritime usage is confined to the area outlined in Appendix 1 if the Proposed Licence, if granted. Furthermore, the Proposed Licence, if granted, has a condition stating that the Permitted Maritime Usage shall be carried out in accordance with the plans and particulars submitted in support of the MUL application.

7. Recommendation

Having considered the information submitted in support of the application, and the criteria specified in the Maritime Area Planning Act 2021, as amended, we recommend that a Maritime Usage Licence in accordance with Section 119 of the Maritime Area Planning Act, 2021, as amended, be granted to **Uisce Éireann, Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86** for *Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000*, subject to the conditions in the Proposed Licence and for a duration of 5 years.

Signed:	[redacted]
Prepared by:	Tom Manning, Ross Fitzgerald Marine Analysts
Date:	05/11/2026