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

October 13, 2026

licence@mara.ie

RE: LIC230013MA Port of Waterford Company

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the request to amend the existing MUL: LIC230013. Port of Waterford Company wish to remove Specific Condition 28 regarding fish spawning and nursery grounds, to allow the proposed marine environmental surveys for the purposes of site investigation, to take place between 1st November and 31st January.

As stated in our previous comments on the initial licence application, 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.

To inform the DAFM response, the observations of the Marine Institute (MI) and Sea Fisheries Protection Authority (SFPA) on the application for the Material Amendment were requested.

The MI confirm that November -January is an important spawning period for a number of stocks of commercial importance but have stated that the consultant's report makes a strong case for a low or negligible impact on sprat, cod and turbot spawning

In respect of herring, the MI has not identified evidence that would conclusively confirm the presence of spawning grounds at the proposed works location. However, the MI have identified herring spawning grounds relatively close to the site area and have stated that some uncertainty remains regarding the extent and transport of suspended sediments generated by the site investigations. The potential for sediment plumes to overlap with spawning habitat, and the consequent effects on herring eggs or early life stages, is therefore difficult to assess based on the information currently available.

The available scientific information also indicates that the **wider estuary** may support seasonally important aggregations of mature herring and juvenile cod, and some uncertainty therefore remains regarding potential interactions with these life stages.

The SFPA state that, in reviewing the additional scientific report provided by the external environmental consultancy, it is not envisaged at this time that this project will present possible implications for the SFPA in conducting official controls or possible non-compliance issues.

The SFPA continue to state that any potential impacts are considered to have negligible impact on adjacent shellfish production areas, and the project is not expected to have any impact on seafood safety in the local environment.

Please also find attached observations from the MI and SFPA for consideration.

Yours sincerely,

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