An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Licence Ref: MUL260011
(Please quote in all related correspondence)

30 September 2026

Maritime Area Regulatory Authority
2nd Floor
Menapia House
Drinagh Business Park
Drinagh
Wexford
Y35RF29

Via: licence@mara.gov.ie

Re: Maritime usage licence application for an offshore survey and cargo salvage campaign at the RMS Laconia wreck site within the proposed Marine Usage Licence (MUL) area Irish Exclusive Economic Zone (EEZ), 150 miles (~240 km) NW by W of Fastnet, on the Porcupine Bank.

A chara

I refer to correspondence on 4 September 2026 received in connection with the above.

Outlined below are heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The Department of Housing, Local Government and Heritage (the Department) has reviewed the Maritime Usage Licence (MUL) application (MUL260011) and the associated documentation for the proposed survey works. The Natura Impact Statement (NIS) concludes that "provided the mitigation measures described in this document are fully implemented, no adverse effect on the integrity of any European site will occur". This is supported by the available information for the assessment of impacts from vessel activity and underwater noise disturbance. The Department notes that there is a data gap on sound source levels of the salvage equipment which impedes definitively ruling out minor potential impacts on marine mammals, and while, behavioural disturbance (temporary avoidance) due to vessel presence is the principal potential effect, the Department notes that marine

mammals are also potential receptors for mechanical noise. However, properly executing the specified mitigation measures, including a marine mammal observer, pre-start watch, and ramp-up protocol, is expected to effectively minimise these impacts. The Department recommends that compliance with marine mammal risk avoidance protocol[1] (NPWS, 2014) is attached to the consent.

1. Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters. (NPWS, 2014). https://www.npws.ie/sites/default/files/general/Underwater%20sound%20guidance_Jan%202014.pdf

Underwater Archaeology

As the wreck being proposed as the focus of salvage, i.e. potential remains of ocean liner 1917 RMS *Laconia*, is a wreck over 100 years old, it may fall within the scope of the 2001 UNESCO Convention on the Protection of Underwater Cultural Heritage, to which Ireland is now a States Party. As such, and in keeping with the standards set out in the Rules of the Annex of the 2001 Convention, a detailed Underwater Archaeological Impact Assessment (UAIA) should inform on all identifiable (direct and indirect) impacts that may occur to the wreck site by the proposed salvage operation.

UAIA:

The following should form the basis of the assessment:

- Undertaken by a professional archaeologist with underwater cultural heritage experience.
- A detailed desktop study be undertaken, to include looking at the wreck data for the area, inform on the significance of the RMS *Laconia*, its loss, its human loss, etc.
- Review all information and results from surveys undertaken at the wreck site to understand the condition of the wreck and how it may/will be impacted.
- Set out a detailed Impact Statement.
- Put forward informed mitigation and recommendations for avoiding/limiting impact to the wreck site.

Recommendations:

The Department strongly recommends the following:

- MARA includes as a condition the requirement for a detailed UAIA to inform on the potential impacts to the wreck site, to take the form of that set out above. Applicants to submit UAIA report to MARA and the Department for further review and comment in advance of any salvage operations taking place;
- MARA seeks confirmation (ideally visual) of identity of the remains of the 1917 wreck RMS *Laconia*.

The Department is available to discuss any of the above.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) fem.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

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Amy Thornton
Development Applications Unit
Administration