MERC Consultants
environmental and conservation services

Statement of Compliance with the Marine Strategy Framework Directive (MSFD)
Applicant: SalvOcean Ltd
MUL application for: Survey and controlled salvage work on RMS Laconia
Document reference: Attachment
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1. Introduction

The key objective of the Marine Strategy Framework Directive (MSFD) is to protect the marine ecosystem and biodiversity upon which our health and marine-related economic and social activities depend. Its aim is to achieve good environmental status (GES) of the EU's marine waters and sustainably protect the resource base upon which marine-related economic and social activities depend.

To help EU countries achieve a good environmental status (GES), the directive sets out 11 illustrative qualitative descriptors. To achieve this goal of GES, the MSFD has set out a programme of measures to address the identified stressors. A total of 28 separate measures has been set out. These measures are mostly focused on reducing pressures by improving water quality and preventing environmental damage. Negative impacts stated in the MSFD include, for example, pollution, biodiversity loss, seabed damage, overexploitation, spread of non-indigenous species, marine litter, underwater noise, and ocean warming and acidification.

This project is supported by Supporting Information for Screening for EIA (SISEIA). The SISEIA assessed the project's implications for the receiving environment. It concluded that, based on the scale and scope of the proposed project, no significant adverse effect on the marine environment is predicted. The proposed project comprises offshore geophysical and visual survey work, together with controlled salvage activities, at the RMS Laconia wreck site on the Porcupine Bank within Ireland's Exclusive Economic Zone. The purpose of this document is to assess whether the scale, nature and control measures associated with the proposed works are consistent with the objectives of the MSFD.

SalvOcean's operational procedures for this project define the four operational phases, local seabed laydown/collection arrangements, environmental controls and as-found/as-left recording requirements.

2. MSFD assessment

The assessment below considers the 11 qualitative descriptors used under the MSFD. It is based on the activity description and the findings of the SISEIA, SISAA, NIS and Annex IV Risk Assessment. Where a pressure pathway exists, the assessment reflects the embedded controls and mitigation proposed for the project.

Descriptor	Analysis	Assessment
Descriptor 1: Biodiversity is maintained	The SISEIA provided a description of the biodiversity baseline of the proposed project location and its environs. In addition, a separate SISAA, Natura Impact Statement (NIS) and Annex IV Risk Assessment were prepared for this project. All of which examined the potential for impact on various elements of the biodiversity of the proposed project area and the potential for project-related impacts on them. The SISAA, SISEIA and Annex IV Risk assessment recommended mitigation to ensure no impact on identified sensitive receptors occurred. No intentional detonation or explosive ordnance disposal activities form part of the proposed works under the MUL application.	Provided the mitigations recommended in the NIS, Annex IV Risk assessment and SISEIA are fully implemented, no potential for impact on this descriptor is considered possible.
Descriptor 2: Non-indigenous species do not adversely alter ecosystems	No project element is intended to introduce or spread non-indigenous species. Vessel operations remain subject to standard maritime controls, including normal pollution and biosecurity management.	No potential for impact.
Descriptor 3: Populations of commercial fish and shellfish species are healthy	Commercial fishing occurs in the wider offshore area. The proposed works are temporary, spatially confined and centered on the wreck site.	No potential for impact.
Descriptor 4: Food webs ensure long-term abundance and reproduction of species	The works are of short duration and highly localised. No project mechanism has been identified that would materially alter trophic structure, prey availability, or reproductive success at a scale relevant to this descriptor.	No potential for impact.
Descriptor 5: Eutrophication is reduced	No impacts relative to eutrophication are possible.	No potential for impact.
Descriptor 6: Sea-floor integrity ensures the proper functioning of ecosystems	The proposed works include controlled seabed interaction at the wreck site, including localised sediment clearance and salvage-related disturbance. These effects are confined to the immediate wreck footprint, occur in an already historically disturbed area, and are temporary and limited in scale. The proposed salvage is confined to the bow/forward holds more than 85 m away; the shell	A localised, temporary seabed effect will occur, but no significant adverse effect on sea-floor integrity at the ecosystem scale is predicted. No potential for impact.

Descriptor	Analysis	Assessment
	stack will not be disturbed, and frond matting is proposed for in-situ protection of the exposed UXO area.	The proposed effects are confined to an already historically disturbed wreck site and are not considered likely to affect sea-floor integrity at a wider ecosystem scale
Descriptor 7: Permanent alteration of hydrographical conditions does not adversely affect ecosystems	The project will not alter tides, currents, wave climate or other hydrographical conditions. The proposed project does not have the potential to cause any hydrographical changes.	No potential for impact.
Descriptor 8: Concentrations of contaminants give no pollution effects	No intentional release of a contaminant forms part of the works. Standard vessel and operational pollution controls apply, including spill prevention and response procedures. SalvOcean will undertake specific pollution controls: spill kits at suitable locations, synthetic biodegradable hydraulic oils where oil-powered subsea tooling is required, segregation and compliant disposal of used spill materials, and environmental-incident notification/response arrangements.	Provided standard controls are followed, no significant pollution effect is predicted.
Descriptor 9: Contaminants in seafood are at safe levels	The proposed works do not include any activity likely to increase contaminant concentrations in seafood resources.	No pathway to effect has been identified.
Descriptor 10: Marine litter does not cause harm	The works do not involve deliberate disposal of materials to sea. Standard waste-handling, containment, and recovery procedures apply during vessel and salvage operations. No recovery of the identified ordnance is proposed. The UXO mitigation instead provides for non-disturbance and frond-mat in-situ protection of the exposed shell/lard-crate area. Non-incinerator vessel waste is to be returned to port for compliant disposal. Frond matting is a planned, point-fixed protective installation with an as-built record, rather than marine litter.	No significant pathway to effect has been identified.
Descriptor 11: Introduction of energy, including underwater noise, does not adversely affect the ecosystem	Acoustic survey systems, vessel thrusters and salvage equipment will generate underwater noise. The SISAA, SISEIA and Annex IV Risk Assessment identify this as a relevant pressure pathway in the absence of mitigation. No explosive ordnance recovery or disposal activities form part of the works proposed under the MUL application.	Provided the mitigation recommended in the NIS, Annex IV Risk assessment and SISEIA is adhered to no potential for impact on this descriptor is considered possible.

Descriptor	Analysis	Assessment
	A suitably qualified Marine Mammal Observer (MMO, will undertake visual monitoring during periods of elevated acoustic activity where practicable and safe to do so, in accordance with NPWS (2014) Guidance. Any required UXO verification will be directed by a third-party qualified and regulated UXO technician. No disturbance of the identified shell-cargo stack will take place; the proposed salvage area is more than 85 m away from identified munition materials storage.	

3. Conclusion

The RMS Laconia project includes both survey and controlled salvage activities, so some localised and temporary interaction with the seabed and underwater sound environment is unavoidable. However, those effects are spatially limited, short-term, and subject to operational controls and mitigation measures.

SalvOcean will adhere to MARA's guidance note regarding UXO. Salvage will be concentrated on the bow and forward holds more than 85 m away from stored UXO materials, with qualified UXO-technician oversight of any verification and frond-mat in-situ protection of the exposed UXO area. No intentional detonation or UXO recovery forms part of the current application.

Based on the assessments supplied and the stated mitigation measures, and standard vessel controls, the proposed project is not expected to cause significant adverse effects that would undermine the objectives of the Marine Strategy Framework Directive. The project is therefore considered to be compliant with the MSFD.

Given the offshore location within Ireland's EEZ and continental shelf, and the highly localised and temporary nature of the proposed works, significant transboundary environmental effects are not predicted.

References

DIRECTIVE 2008/56/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive)

MARA 2024. Guidance Note Identification of Unexploded Ordinance (UXO) in the Maritime Area Guidance for Consent Holders on the identification of Unexploded Ordnance (UXO) in the Maritime Area. Guidance Note 001 October 2024. https://www.maritimeregulator.ie/wp-content/uploads/2025/10/CER-Guidance-001-UXO-Unexploded-Ordinance.pdf

MERC (2026). Supporting Information for Screening for EIA (SISEIA) Report: Survey and salvage work on RMS Laconia.

MERC (2026). Supporting Information for Screening for Appropriate Assessment: Survey and salvage work on RMS Laconia.

MERC (2026). Nature Impact Statement: Survey and salvage work on RMS Laconia.

MERC (2026). EU Habitats Directive Annex IV Risk Assessment: Survey and salvage work on RMS Laconia.

MSFD Compliance Template. Compliance with the Marine Strategy Framework Directive. https://environment.ec.europa.eu/topics/marine-environment_en