



MERC Consultants
environmental and conservation services

Statement of Compliance with the National Marine Planning Framework (NMPF)	
Applicant:	SalvOcean
MUL application for:	Survey and salvage work of the RMS Laconia
Document reference:	Attachment 4.1
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The National Marine Planning Framework (NMPF) sets out Overarching Marine Planning Policies (OMPPs) that apply to marine activities and development in Ireland's maritime area. These include policies relating to, inter alia, co-existence, biodiversity, coastal and island communities, and infrastructure.

Salvocean's project comprises survey and controlled salvage works at the RMS Laconia wreck site, located offshore within Ireland's Exclusive Economic Zone on the Porcupine Bank. Proposed works are temporary in nature, limited to an immediate wreck-footprint work area, and are supported by the accompanying SISAA, Natura Impact Statement, Annex IV Risk Assessment, and Supporting Information for Screening for EIA (SISEIA).

The proposed works are confined to the immediate wreck footprint and do not include any intentional detonation or explosive ordnance disposal activities.

The controlled operational footprint also includes discrete adjacent seabed locations for subsea containers, frond-matting installation and dedicated laydown of cut wreck sections/non-recovered overburden at the bow. These remain local to the wreck-site operation; the UXO non-disturbance and >85 m separation basis is unchanged

The proposed project is considered to have limited potential to interact with the NMPF's overarching marine planning policies. Nonetheless, those policies have been reviewed in relation to the proposed project and are assessed in the table below. Based on the project's scale, duration, location, and proposed mitigation measures, the project is considered broadly consistent with the relevant objectives and policies of the NMPF.

Table 1. Assessment of compliance with the National Marine Planning Framework (NMPF).

Policy area	Assessment of compliance with the NMPF
Environmental - Ocean Health	
Biodiversity & Protected Marine Sites	

Policy area	Assessment of compliance with the NMPF
The SISAA identified the need for Appropriate Assessment, while the NIS concludes that, subject to implementation of the proposed mitigation, no adverse effect on the integrity of any European site will occur.	
Biodiversity	The project is supported by the following documents: SISAA. Natura Impact Statement (NIS). Annex IV Risk Assessment. and Supporting Information for Screening for EIA (SISEIA). Those assessments indicate that, subject to implementation of the proposed mitigation /s and operational controls, the temporary survey and controlled salvage works are highly unlikely to result in significant adverse effects on marine biodiversity. The SISEIA further concludes that the proposed effects are localised, temporary and limited to the immediate vicinity of the wreck site
Protected Marine Sites	A number of European sites were screened in the accompanying reports for assessment on a precautionary basis. The Natura Impact Statement concludes that, provided the proposed mitigation is implemented, no adverse effect on the integrity of any European site will occur. The SISAA identified the need for Appropriate Assessment, while the NIS concludes that, subject to implementation of the proposed mitigation, no adverse effect on the integrity of any European site will occur.
Non-indigenous Species	The SISAA and SISEIA did not identify any potential for the introduction of non-indigenous species.
Water Quality	The SISAA and SISEIA do not identify a pathway for significant effects on water quality, having regard to the temporary nature, limited footprint, and proposed controls for the works. SalvOcean in their operational plans specifies the use of spill kits if needed, synthetic biodegradable hydraulic oils where oil-powered subsea tooling is required, segregation/compliant disposal of used spill materials, return of non-incinerator waste to port, and environmental-incident notification/response procedures.

Policy area	Assessment of compliance with the NMPF
Sea-floor and water column integrity	The scale and scope of the project does not have the potential to result in significant adverse effects on Sea-floor and Water Column Integrity as documented in the SISEIA. SalvOcean's operational procedure identifies local seabed laydown zones for cutting deck sections/equipment and non-recovered overburden adjacent to the bow work area, plus placement of subsea containers and frond mats. These activities remain discrete and localised within the wreck-site operational area and are followed by as-left video/MBES and hydrocarbon leak-detection surveys.
Marine Litter	The scale and scope of the project does not have the potential to intentionally or accidentally contribute to the impacts on marine litter policy as documented in the SISEIA. The receiving environment has already been subject to historical disturbance associated with previous salvage activity. Non-incinerator vessel waste is to be returned to port for compliant disposal, and frond matting is an intentional, survey point-fixed protective installation with an as-built record.
Underwater Noise	Underwater noise has been assessed in the SISAA, Natura Impact Statement, Annex IV Risk Assessment, and SISEIA. Acoustic and operational sources may give rise to localised and temporary disturbance in the immediate vicinity of the works, but the proposed mitigation is intended to avoid significant effects. The SISEIA notes that much of the salvage equipment generates intermittent, task-driven mechanical sound rather than continuous acoustic transmission. A specialist underwater UXO consultancy will also be retained to assess munitions-related risk and any implications for underwater-noise assessment. The SISEIA notes that much of the salvage equipment generates intermittent, task-driven mechanical sound rather than continuous acoustic transmission. SalvOcean August 2026 UXO review provides the munitions-risk rationale and confirms that the identified shell-cargo stack will not be disturbed under the proposed salvage scope.

Policy area	Assessment of compliance with the NMPF
	The UXO mitigation confines salvage to the bow and forward holds more than 85 m from the identified shell-cargo stack. Any required UXO verification will be directed by a third-party qualified and regulated UXO technician. No intentional detonation or disturbance of the shell stack is proposed.
Air Quality	Not materially relevant at the scale of this project. Temporary vessel emissions will occur but are not of a nature or magnitude likely to create a conflict with NMPF air-quality policy in this offshore context.
Climate Change	The proposed project is temporary and limited in extent. It does not give rise to any significant climate-related planning conflict and does not prejudice national climate objectives.
Economic - Thriving Maritime Economy	
Co-existence	The activities are temporary, limited in geographic scope, and located offshore. Some short-term exclusion or operational disturbance to very localised fisheries or passing vessels, occurring in the immediate vicinity of the works, but no significant long-term conflict with the co-existence policy is identified.
Infrastructure	No potential for impact on the infrastructure policy. No permanent infrastructure is proposed.
Social - Engagement with the Sea	
Access	No significant access issues have been identified.
Employment	Not applicable. It is considered that the Employment Policy 1 is not relevant to the proposed project.
Heritage Assets	An accredited marine archaeologist will be present during survey and salvage operations, with archaeological recording and reporting undertaken in accordance with established professional standards.
Rural Coast and Island Communities	This policy is not considered relevant to the proposed project.
Seascape and Landscape	No impact possible.
Social Benefits	The project may contribute to improved documentation, assessment, and managed recovery of material associated

Policy area	Assessment of compliance with the NMPF
	with the wreck site. This does not conflict with the NMPF's broader social objectives.
Transboundary	No credible transboundary effects are identified, having regard to the temporary nature of the works, the limited footprint, and the absence of a credible impact pathway to another jurisdiction 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.

Conclusion

Based on the scale, duration, location, and proposed mitigation and controls, the proposed project is considered consistent with the relevant objectives and policies of the NMPF.

SalvOcean will follow MARA's UXO guidance note. Salvage will concentrate on the bow and forward holds more than 85 m away from identified UXO; any required verification will be directed by a qualified UXO technician and frond matting is proposed for in-situ protection of the exposed UXO/lard-crate area.

Having regard to the accompanying SISEIA report and supporting ecological assessments, the proposed survey and controlled salvage work at RMS Laconia are considered consistent with the relevant Overarching Marine Planning Policies of the NMPF, subject to implementation of the mitigation and operational controls identified in those documents.

The project is also considered consistent with the environmental protection objectives of the MSFD and with the mitigation and operational controls identified across the accompanying document suite.

References

Appropriate Assessment Determination National Marine Planning Framework.

<https://assets.gov.ie/static/documents/national-marine-planning-framework-appropriate-assessment-aa-determination.pdf>

MARA 2024. Guidance Note Identification of Unexploded Ordnance (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-Ordnance.pdf>

Project Ireland 2040 National Marine Planning Framework. <https://assets.gov.ie/static/documents/national-marine-planning-framework.pdf>

Project Ireland 2040 National Marine Planning Framework Strategic Environmental Assessment (SEA) Statement. <https://assets.gov.ie/static/documents/national-marine-planning-framework-strategic-environmental-assessment-sea-statement.pdf>