



MERC Consultants
environmental and conservation services

Statement of Compliance with the Water Framework Directive (WFD)
Applicant: SalvOcean
MUL application for: Survey and controlled salvage work on RMS Laconia
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The key objectives of the Water Framework Directive (Directive 2000/60/EC) are set out in Article 4 of the WFD. It requires Member States to use their River Basin Management Plans and Programmes of Measures to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration, thereby ensuring good qualitative and quantitative health, i.e. through reducing and removing pollution and ensuring that there is enough water to support wildlife at the same time as human needs. The WFD objectives are implemented in Ireland through the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009, as amended, e.g., 327 of 2012, 77 of 2019, 659 of 2021 and SI 410 of 2023).

This compliance note has been prepared using the project description and findings presented in the Supporting Information for Screening for Appropriate Assessment (MERC, 2026) and the Supporting Information for Screening for Environmental Impact Assessment (MERC, 2026) report for the proposed survey and controlled salvage works at RMS Laconia. The proposed works comprise offshore geophysical and visual survey, ROV operations, localised sediment clearance where required, and controlled recovery of selected cargoes and artefacts within the immediate wreck footprint on the Porcupine Bank. No ordnance recovery or disposal activities form part of the proposed works.

SalvOcean proposes a four-phase operational sequence and specifies local subsea containers and dedicated seabed laydown zones adjacent to the bow work area for cut wreck sections/non-recovered overburden, followed by as-left survey and equipment recovery.

Salvage will concentrate on the bow and forward holds more than 85 m away from identified ordnance. Frond matting is proposed over the exposed UXO/lard-crate area to secure it and promote in-situ preservation. SalvOcean will follow the guidance provided by Mara (2024) for the Identification of Unexploded Ordnance.

Table 1. WFD Waterbody Definitions

‘Transitional waters’ are bodies of surface water in the vicinity of river mouths which are partly saline in character as a result of their proximity to coastal waters but which are substantially influenced by freshwater flows”
‘Coastal water’ means surface water on the landward side of a line, every point of which is at a distance of one nautical mile on the seaward side from the nearest point of the baseline from which the breadth of territorial waters is measured, extending where appropriate up to the outer limit of transitional waters.

The RMS Laconia wreck site lies approximately 240 km offshore, within Ireland's Exclusive Economic Zone and on the continental shelf. The closest coastal water body (Southwestern Atlantic Seaboard Has 21;22) is approximately 224 km from RMS Laconia. As such, the proposed project is well beyond transitional and coastal water bodies managed under the WFD river basin planning framework. There is therefore no direct spatial overlap with any identified WFD surface water body.

There are no protected areas within the ZoI of the MUL area. The potential for impact was examined in the Supporting Information for Screening for Appropriate Assessment (MERC, 2026) and the Supporting Information for Screening for Environmental Impact Assessment (MERC, 2026) prepared for the MUL application. No likely significant effect on the ecological status of any WFD waterbody, including any waterbody associated with a protected area, has been identified.

The key elements used to assess ecological status are listed in **Table 2**. Further detail on the identification of pressures with the potential to affect the water quality elements and their likely impacts is given in MERC 2026a and MERC, 2026b.

Table 2: Indicators of Good Ecological Status

Category	Quality Element / Indicator	Metrics considered	Assessment
Biological	Phytoplankton	Phytoplankton biomass abundance, species composition, and frequency of blooms.	No element of the proposed project has the potential to alter the baseline metrics of phytoplankton.
Biological	Macrophytes & Phytobenthos	Species composition, coverage, diversity, and sensitivity to disturbance	No element of the proposed project has the potential to alter the baseline metrics of macrophytes & phytobenthos.
Biological	Benthic Invertebrates	No element of the proposed project has the potential to alter the baseline metrics of Diversity, abundance, pollution sensitivity, and community structure	SISAA examined the potential for impact on benthic habitats.

Category	Quality Element / Indicator	Metrics considered	Assessment
Biological	Fish Fauna	Species composition, abundance, age structure, migration patterns	SISAA and SISEIA examined the potential for impact on commercial fish and Annex II fish species. No potential for impact was recorded.
Hydromorphological	Hydrological Regime	Flow quantity and dynamics, water level fluctuations, groundwater connection	No potential to alter baseline condition of hydrological regime.
Hydromorphological	River Continuity	Barriers to movement (weirs, dams), fish passage	No barriers to fish passage proposed.
Hydromorphological	Morphological Conditions	Channel structure, substrate composition, riparian zone condition, bank/shore structure	Offshore project with no potential to alter baseline condition.
Physico-chemical	General Conditions	Temperature, dissolved oxygen, pH, salinity	No potential to change general conditions.
Physico-chemical	Nutrients	Nitrogen (nitrate, ammonia), phosphorus (phosphate)	No nutrients are discharged to the sea.
Physico-chemical	Specific Pollutants	Metals, pesticides, and other nationally identified substances (EQS compliance)	No introduction of pollutants is possible. MARPOL-compliant vessels. Identified shell-cargo stacks will not be disturbed. The proposed salvage area is more than 85 m away, and frond matting is proposed to secure the exposed UXO/lard-crate area and reduce further scour/exposure. Any unexpected suspect munition encountered elsewhere will trigger stop-work and qualified UXO assessment. SalvOcean will have spill kits at suitable locations, use synthetic biodegradable hydraulic oils where oil-powered subsea tooling is required, undertake segregation and compliant disposal of used spill materials, and has environmental-incident response procedures in place.
Chemical (Separate Status)	Priority Substances	Mercury, cadmium, PFAS, PAHs and other EU priority chemicals (pass/fail)	No dumping at sea or introduction of priority substances possible. MARPOL-compliant vessels: standard pollution prevention and

Category	Quality Element / Indicator	Metrics considered	Assessment
			spill response measures implemented. No ordnance recovery or disposal is proposed. Any UXO verification will be undertaken under qualified specialist direction.

Any sediment disturbance associated with the salvage phase would be localised, temporary, and confined to the immediate vicinity of the wreck footprint in deep offshore waters. The works do not involve discharge to a river basin district water body, abstraction, hydromorphological modification of any WFD water body, or any activity that would be expected to alter the classification of a coastal, transitional, surface water, or groundwater body.

The SISEIA further notes that the receiving environment has already been subject to historical disturbance associated with previous salvage operations at the wreck site.

In addition, the work is to be undertaken by a MARPOL-compliant vessel operating under standard pollution prevention and response controls, including vessel management procedures, waste-handling measures, and spill-prevention arrangements. On that basis, the project does not present a realistic mechanism for a measurable deterioration in water quality within any receiving WFD water body.

SalvOcean will have a project-specific HIRA before mobilisation; Permit-to-Work, Job Safety Analysis, lift-plan and recorded toolbox-talk controls; twice-daily/12-hour weather forecasts with suspension of operations when operating limits are exceeded; spill kits at suitable locations; use of synthetic biodegradable hydraulic oils where oil-powered subsea tooling is required; segregation and compliant disposal of used spill materials; return of non-incinerator waste to port for compliant disposal; and defined notification/response arrangements for environmental incidents.

These measures include SOPEP implementation, spill kits, bunkering controls, waste-management procedures, and incident-reporting protocols.

Accordingly, having regard to the scale, location, and nature of the proposed project, and to the findings of the SISEIA report, the proposed survey and controlled salvage works on RMS Laconia are not considered likely to cause deterioration in the status of any WFD water body, nor to undermine the achievement of the objectives of the Water Framework Directive.

A summary assessment of the potential for project-related pressures to alter their baseline condition is provided in Table 3.

Table 3. Summary assessment

WFD consideration	Project relevance	Conclusion
Spatial overlap with WFD water bodies	No overlap. The wreck site is deep offshore waters on the Porcupine Bank, far beyond coastal and transitional WFD water bodies.	No direct WFD water body interaction.
Water quality/status deterioration risk	No planned discharge to a WFD water body. Vessel operations comply with MARPOL standards and include standard pollution prevention controls.	No realistic pathway for deterioration in status.
Hydro morphology/seabed disturbance	Localised and temporary disturbance may occur at the wreck footprint during controlled salvage and sediment clearance. SalvOcean proposes to have seabed laydown locations for cut wreck material/non-recovered overburden, together with subsea containers and the frond-mating area. This refines the local operational footprint but does not create spatial overlap with a classified WFD water body.	The effect remains confined to offshore seabed conditions and does not affect a classified WFD water body.

Conclusion

Based on the available project information and the findings of the SISEIA report, the proposed works are considered compliant with the objectives of the Water Framework Directive. No likely deterioration of any WFD water body is identified, and no conflict with Article 4 objectives is anticipated.

The conclusions of this compliance assessment are aligned with the accompanying SISAA, Natura Impact Statement, Annex IV Risk Assessment and SISEIA prepared in support of the MUL application.

Statement of Professional Authority

This assessment of compliance with the Water Framework Directive was prepared by Nick Pfeiffer (MCIEEM), Dr Ronan Browne and Dr Louise Scally (MCIEEM) of MERC Consultants. MERC is a specialist marine ecological consultancy with extensive expertise in marine environmental assessment, ecological fieldwork and the management and conservation of marine ecosystems. Our team has substantial combined practical experience spanning more than 60 years undertaking complex aquatic surveys and providing independent scientific advice in support of Marine Protected Areas, designated conservation sites and sustainable marine development.

MERC also is active in supporting public authorities, developers and marine operators throughout various consenting and regulatory processes, including for projects involving aquaculture, marine seabed surveys, shipwreck recovery and removal, port infrastructure and offshore renewable energy. Our work combines robust scientific methodology, extensive field experience and a detailed understanding of current national and EU environmental law and relevant marine regulatory requirements.

Through our breadth of technical expertise and proven experience in challenging marine environments, MERC provides credible, evidence-based ecological advice to inform sound environmental decision-making and the sustainable management of marine resources.

References

European Parliament and Council of the European Union, 2014. Consolidated text: Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (consolidated version incorporating amendments to 1 January 2014), CELEX: 02000L0060-20140101. Available via EUR-Lex. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A02000L0060-20140101&utm>

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>