

From: [SeafoodClimate](#)
To: [Marine](#)
Cc: [SeafoodClimate](#)
Subject: Proposed offshore wind energy development – Arklow Bank Wind Park 2
Date: Wednesday 29 July 2026 16:17:36
Attachments: [DAFM return - Arklow Bank Wind Farm 2.pdf](#)
[BIM obs - Arklow Bank Wind Farm 2.pdf](#)
[MI obs - Arklow Bank Wind Park 2.pdf](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Good afternoon,

Please find attached the responses of DAFM and its agencies relating to Arklow Bank Wind Park 2.

Please confirm receipt.

Thanks,

Niamh Healy
Executive Officer
Seafood Climate Unit
Inshore and Seafood Climate & Environmental Division
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine

An Lárionad Bia Mara Náisiúnta, Cloich na Coillte, Corcaigh, P85 TX47
National Seafood Centre, Clonakilty, Co Cork P85 TX47

T +353 (0)2388 36205
www.agriculture.gov.ie

Disclaimer:

Department of Agriculture, Food and the Marine

The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended recipient(s). This information may be subject to legal and professional privilege. If you are not an intended recipient of this email, you must not use, disclose, copy, distribute or retain this message or any part of it. If you have received this email in error, please notify the sender immediately and delete all copies of this email from your computer system(s).

An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.



29th July 2026

marine@pleanala.ie

RE: Proposed offshore wind energy development – Arklow Bank Wind Park 2

A Chairde,

The Marine Divisions of the Department of Agriculture, Food and the Marine welcome the opportunity to provide comments on the additional information relating to the proposed offshore wind energy development at Arklow Bank Wind Park.

The importance of primary and secondary food production activities is reflected in the Irish Government's [Food Vision 2030](#) policy. Seafood, as a source of protein, is vital to food security. The importance of the seafood sector should be taken into consideration when cumulative ORE plans and projects are being implemented and adverse effects on the sector avoided as much as possible.

Fishers are primary food producers dependent upon certain marine areas which are particularly important for food production. This primary production is critical to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities.

In Ireland, the seafood sector supports economic activity in peripheral coastal communities right around our coast. The seafood sector – including fishing, processing, and ancillary support services – is a major source of employment in rural and coastal areas. Bord Iascaigh Mhara (BIM), the Irish State agency responsible for the development of the Irish seafood industry, has reported that over 16,800 jobs in the Republic of Ireland are reliant on the seafood sector with a total GDP valued at €1.24 billion.

To inform DAFM comments, observations on the application were requested from Ireland's Marine Institute (MI) and Bord Iascaigh Mhara (BIM). BIM have also included feedback from local fishers in their comments.

The MI advised that the degree of impacts could be higher than currently stated as conclusion have been maintained by the developer that the development will have a non-significant impact either at a site and at a cumulative phase 1 scale. However, this assessment is dependent on the underlying data and its robustness, the limitations of which have been highlighted by the MI throughout and were partially addressed in the response to comments.

In relation to comments on the potential impacts of Arklow Bank Wind Park 2 on fishing activity, the recently published BIM report Interactions between Offshore Wind Farms and

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

Government Buildings, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85 TX47

T +353 (0)23 8859500

gov.ie - Department of Agriculture, Food and the Marine (www.gov.ie)



Fisheries in European waters provides evidence on interactions between offshore wind developments and fishing activity. The report is available on BIM's website at this [link](#).

A variety of fishing activities take place adjacent to the proposed development site, including pot fishing (mainly for whelk, and also for lobster, crab, and shrimp, which are some of the most significant stocks fished by the inshore fleet), net/bottom trawl, line, and some dredge fisheries in the vicinity ([Ireland's Marine Atlas](#)). In 2025, the Irish fleet landed €7 million worth of whelk, €25 million worth of crab, and €13 million worth of lobster.

A challenge for the inshore fleet is that vessels under 12 metres are mostly not required to carry Vessel Monitoring Systems (VMS). This means their activities are less visible in official data, and the true scale and patterns of inshore fishing are not fully captured. The developer has proposed the selective implementation of inshore VMS to improve baseline data. It is important that any such monitoring is sufficiently comprehensive and transparent to accurately reflect fishing patterns and address concerns raised by the industry regarding coverage and data reliability.

The revised EIAR (March 2026) sets out that the developer will carry out a confirmatory survey (prior to the commencement of construction) within the Array Area, Cable Corridor, and Working Area to verify the presence/absence of any areas of reef habitat and blue mussel beds. The sharing of survey results and methodologies in a timely and transparent manner will support informed decision-making and ensure that the interests of both the fishing and aquaculture sectors are considered.

The undertaking of a research project focused on investigating potential cumulative displacement effects of such an offshore renewable energy development, and examination on the feasibility of this, is acknowledged. Potential impacts could include increased steaming times to fishing grounds, potential restrictions on key fishing grounds, heightened fishing pressure on adjacent shellfish resources, gear conflicts, and economic effects on operators. The sensitivity of individual operators to displacement needs to be fully acknowledged. Ongoing, structured engagement with industry is essential to ensure that evolving concerns are understood and addressed, and that any emerging evidence of cumulative displacement is identified early and informs adaptive management.

The Department welcomes the ongoing engagement with the Seafood/Offshore Renewable Energy (ORE) Working Group and acknowledges that a Fisheries Liaison Officer (FLO) has been in situ since 2018. Active, timely consultation and engagement with inshore fishing representatives continues to be vitally important for ensuring optimum coordination of activities, to limit disturbance, and to avoid displacement which may increase fishing pressure and competition in other areas.



The Department wishes to stress that it is imperative to comply with the National Marine Planning Framework (NMPF) and that the avoidance of adverse impacts on existing fisheries and aquaculture activities should be the default position and, where this is not possible, then minimising and mitigating adverse effects in that order should be the focus.

DAFM recommends that any adverse effects on the reproduction and welfare of shared fish stocks are avoided, minimized or mitigated to the greatest extent possible.

It is essential that the seafood sector is fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment as the proposed policy is being evaluated.

DAFM recognises that the aim is to promote co-existence and minimise potential disruption to commercial fishing activities in the area and welcomes the consultations in this regard and would encourage further ongoing engagement at all stages of this process.

Yours sincerely,

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

Public consultation regarding the further information request for the Arklow Bank Wind Park 2 ORE project

DAFM request observations on p. 70 and 71 [Applicant Response to the Request for Further Information](#) and p. 189-192 of (p.65-75 are the applicant's response to the MI) of Arklow Bank Wind Park 2 [Applicants Response to Observations](#)

BIM Comments

08.07.2026

In relation to comments on the potential impacts of Arklow Bank Wind Park 2 on fishing activity, the recently published BIM report *Interactions between Offshore Wind Farms and Fisheries in European waters* provides evidence on interactions between offshore wind developments and fishing activity. The report is available on BIM's website at this [link](#)."

BIM have collated several comments below after reaching out to some fishermen in the area.

Applicant Response to the Request for Further Information

The Commercial Fisheries and Aquaculture section response states that the proposed development complies with Co-existence Policy 1 of Vol II chapter 2 of the NMPP. They state that the EIAR in Vol II chapters 14, 15, 16, 19 and 21 in relation to commercial fisheries concludes that there will be no significant effects during all phases (construction, operation and decommissioning)

They further state that there will be no significant impact in combination with the other proposed ORE sites (Oriol, The Dublin Array, NISA and Codling).

All of the above would be disputed by fishermen fishing the proposed area.

The applicant states that observations from prescribed bodies recognise the concern that temporary disruption could contribute to displacement of fishing effort such as whelk potting activity, but that this is being covered by ongoing liaison through the appointed Fisheries Liaison Officer and co-operation agreements.

The applicant also recognises the importance of understanding potential displacement to neighbouring fishing areas not within the development area. In response to this they propose to work with the Marine Institute (MI) to implement iVMS on selected fishing vessels to have real time monitoring over the ORE area to provide baseline data to monitor changes in fishing activity during construction and operation.

Speaking to whelk fishermen within the area they would make the following points.

They are dissatisfied with the level of service to date provided by the Fishery Liaison Officer employed by the applicant. In their view there is a lack of adequate information. Instead, they contrast where newsletters are issued by the applicant, which highlights the funding being provided onshore to community and sports organisations by the applicants, with little information/support to those such as fishermen impacted through their livelihoods by the applicant's development.

Regarding co-operation agreements the fishermen state that they have not to date seen any proposal on what a co-operation agreement would look like. Due to their experience with other ORE developers to date they have serious mistrust on what they will be offered. They fear that the true value of their fishery will not be adequately recognised. To this end they call for a socio-

economic impact study to be conducted, that would look at the level of activity and its value of the seafood sector from the fishing, processing and ancillary services etc. This study should include the neighbouring buffer zones and areas that displacement would likely occur to.

While there is a National Framework Agreement (NFA) being negotiated through the current mediation process, there is no knowledge by local fishers whether this agreement if it is reached will apply to this project development or what process will apply.

Their experience includes, discussing initially with another developer compensation to fully bring in their gear and have it stored ashore. However, this did not happen and instead they obtained compensation but moved their gear to a neighbouring fishing area, impacting on the fishermen there and the whelk stock, which in their view has never since recovered. This illustrated the impact of displacement, but also the potential for the combination impact of the various ORE sites if an adequate system is not implemented across the ORE sites within the region.

Co-operation agreements need to cover neighbouring areas that suffer displacement.

There is a fear regarding the use of iVMS. Some of this arises from them being asked in the past to utilise AIS where other fishermen could see where they are fishing and move on top of them. The applicant has stated in their response that the iVMS would be on 'selected' vessels. There is suspicion regarding this, where all relevant boats are not being covered, including those operating in neighbouring fishing areas.

There is substantial concern on what impact the ORE site will have on fishing activity and catch rates after during construction and after the development is constructed, from the ability to fish safely with the site to the impact on EMF from the cables, turbine vibration etc.

There definitely appears to be a serious thrust issue. If for example iVMS is to be utilised with the co-operation of the MI, the fishermen need to be reassured on how this will work, that it be comprehensive rather than 'selected' vessels and that the data will be monitored and reported by a trusted entity. Ideally to build thrust a monitoring group comprising fishermen to overview the system should be put in place.

Information needs to discuss openly on what process co-operation agreement will be put in place.

DAFM Briefing document: Review of Further Information for the Arklow Bank Wind Park 2 ORE project

Matthew Coleman – Marine Institute — 10/07/2026

Summary

- Conclusion are maintained by the developer that the development will have a non-significant impact either at a site and at a cumulative phase 1 scale – this assessment is however dependent on the underlying data and its robustness, the limitations of which have been highlighted by the MI throughout and are only partially addressed in the response to comments.
- The degree of impacts could therefore be higher than currently stated/assessed.
- In the case where impacts to fisheries cannot be avoided the developer is committed to the FMM policy and working with seafood ORE on compensation mechanism.

Background

In June 2026, the MI were requested to provide comment on the further information request for the Arklow Bank Wind Park 2 ORE project. Observations were requested Applicant Response to the Request for Further Information and response to the original MI observations.

Observations:

Request for Further Information

The response addresses the issues raised regarding co-existence, fisheries impacts, displacement of fishing effort and cumulative effects, and identifies mitigation measures through the FMM and the how this relates to NMPF policy requirements.

The developer address concerns surrounding measuring impact by implementing a mechanism for independent assessment and data gathering. Principally however the applicant continues to outline that it believes the impact of the development will be non-significant despite acknowledge data gaps and limitations in the underlying data, and the potential for displacement and that this effect could disproportionately affect inshore static gear fisheries.

Response to Observations

Fisheries

The response outlines the assessment, mitigation and monitoring measures proposed for fisheries and the impacts of the development. However, uncertainty remains regarding the degree of displacement, how representative the data collected over the 6-year period of fisheries surveys is and subsequently how this data has been used to assess its impact. In addition, the data from this 6 year fisheries survey appears to not have been presented so no comment can be made on its robustness. Monitoring commitments are welcomed, but uncertainty remains regarding potential cumulative impacts on fisheries.

Aquaculture

No further comment, the original observation regarding water quality and sedimentation impacts on aquaculture sites appears to have been addressed.

Effects on Fisheries and Fish Habitats

The response does not address the MI's observation regarding the limitations of the underlying evidence base. Consequently, uncertainty remains regarding potential adverse effects on fish populations and essential fish habitat.

Fish species

The response confirms that European eel, blonde ray, spawning and nursery habitats, cumulative impacts and EMF effects were assessed. However, it largely reiterates the conclusion of no significant effects and does not directly address the recommendation for a more precautionary approach, given the conservation importance of these species and the uncertainties surrounding cumulative impacts and EMF effects.

Underwater Noise

The applicant has acknowledged the recommendation regarding underwater noise monitoring and has committed to engaging with national and regional monitoring bodies. The response also references an Operational Monitoring Programme and commits to involving the fishing industry in a consultative capacity through established fisheries liaison mechanisms.

However, the original observation specifically recommended the establishment of monitoring programmes to assess the effects of construction noise, including baseline monitoring prior to construction and monitoring of relevant ecosystem components during and following construction at appropriate spatial and temporal scales. The applicant has committed to doing so but does not outline how.

Cumulative effects

The cumulative assessment is underpinned by the project assessments both individually and cumulatively being non-significant. Concerns remain regarding how these impacts have been assessed, given the limitations of the data underpinning the analysis. It may therefore be advisable that the assessment adopts a more conservative approach in how potential cumulative effects are classified.

Operational Monitoring

No further comment is provided.