

From: [Bidarra, Helena](#)
To: [Licensing Staff](#)
Cc: [SeafoodEnvironment](#)
Subject: RE: Reg No S0005-03, Dumping at Sea Permit Application by Department of Defence - Haulbowline Naval Base
Date: Thursday 2 October 2025 14:06:37
Attachments: [image001.png](#)
[DAFM Marine Divisions comments to Reg No S0005-03, Dumping at Sea Permit Application by Department of Defence.pdf](#)

Dear Ms O'Sullivan,

Please find attached comments from the Marine Divisions of the Department of Agriculture, Food and the Marine to Reg No S0005-03, Dumping at Sea Permit Application by Department of Defence - Haulbowline Naval Base.

Mise le meas/ Kind regards,

Helena Bidarra

Oifigeach Feidhmiúcháin |

Executive Officer | Inshore and Seafood Climate & Environmental Division

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

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

Office +353 (0)23 885 9551

Mobile +353 (0)87 477 6178

www.agriculture.gov.ie



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



Water, Energy and Business Support Programme,
Office of Environmental Sustainability,
Wexford

licensing@epa.ie

**Re: Reg No S0005-03, Dumping at Sea Permit Application by Department of Defence -
Haulbowline Naval Base**

2 October 2025

Dear Ms O'Sullivan,

The Department of Agriculture, Food and the Marine welcomes the opportunity to provide comments on Reg No S0005-03, Dumping at Sea Permit Application by Department of Defence - Haulbowline Naval Base.

There are a number of herring spawning beds in the Celtic Sea, close to the south coast. Generally, herring spawn over gravel/rock substrates in waters of less than 30m depth. The closest spawning bed is approximately 5km east of the site with additional beds with 10km. It should be confirmed that material dumped at the site will not be advected to the spawning beds prior to settlement as any blanketing of the gravel spawning beds would be detrimental to spawning success.

As there are herring spawning beds in the general area, the presence of herring larvae, juvenile and migrating mature herring at the site cannot be discounted.

There is potting activity in the general area and while this proposal is not anticipated to impact unduly on inshore potting fisheries, relevant local fishing organisations should nevertheless be included on the provision of any Notices to Mariners in this respect and be made aware of proposed works at the earliest opportunity.

Is mise,

Seafood Environmental Unit

Inshore and Seafood Climate & Environmental Division

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine