

Application for a Maritime Usage Licence under the Maritime Area Planning Act 2021

Important Information

Before completing this form please read the declaration and consent at the end of the application form

It is important to note that a change in applicant name will require a new application.

This application and supporting documentation should be submitted by email to licence@mara.gov.ie

Please complete the form electronically. Type details in the boxes provided, space will expand as you type. Please complete form to a high level, i.e. give comprehensive answers to questions, answers which only reference supporting documentation are not sufficient.

Maritime Usage Licence:

Part 5 (sections 110 to 133) of the Maritime Area Planning Act 2021 (MAPA) provides for the granting of maritime usage licences.

Section 112 of the Act states that the Maritime Area Regulatory Authority (MARA) is the competent authority for the purposes of Part 5 of the European Communities (Birds and Natural Habitats) regulations 2011 ([S.I.No. 477 of 2011](#)) and appropriate assessments to which that Part applies.

Section 114 of the Act states that the Minister may by regulations provide for class of Schedule 7 usage to be exempted usage for the purposes of this Part.

[Schedule 7](#) of the Act lists the Maritime Usages that may be undertaken in the maritime area pursuant to licence.

[Schedule 8](#) of the Act lists the types of conditions that MARA may attach to a licence.

Privacy Policy:

MARA may require you to provide certain personal data in order to carry out our legislative and administrative functions. MARA will treat all personal data that you provide as confidential and will process your details in accordance with its obligations under data protection legislation, including the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

A Privacy Statement explaining how MARA, as the Data Controller, will process the personal data you provide, how that information will be used and what rights you may exercise in relation to your personal data, is available in this link: [Privacy Statement](#).

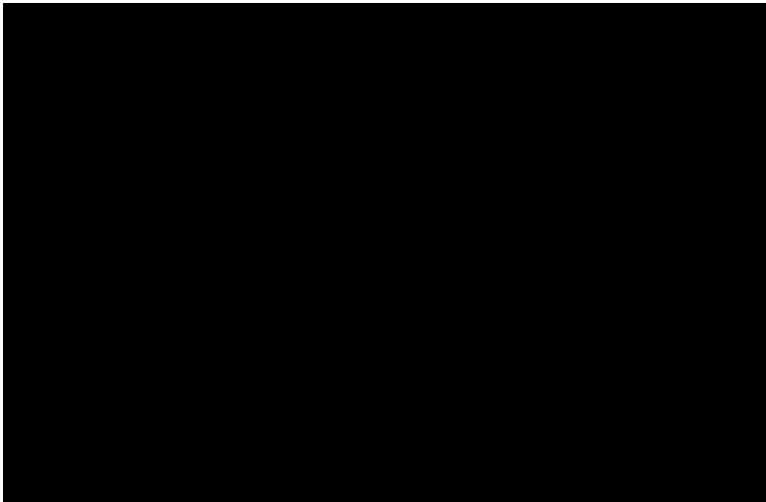
Freedom of Information (FOI)/ Access to Information on the Environment (AIE)

Applicants should be aware that under the Freedom of Information Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007 to 2018, information provided by them to MARA may be liable to be disclosed.


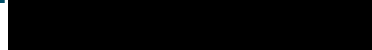
Applicants are asked to consider if any of the information supplied by them in their application should not be disclosed and clearly identify the specific sections of their application containing such information, specifying the reasons for its confidentiality/sensitivity. MARA will consult with applicants about this information before making a decision on any Freedom of Information/Access to Information on the Environment request received.

MARA
2nd Floor, Menapia House,
Drinagh Business Park,
Drinagh,
Wexford,
Y35RF29

www.maritimeregulator.ie

Part 1: Applicant Information	
1.1 Applicant Details	
Name of Applicant (the name that will appear on the licence)	Allod Energy Ltd
Company/Organisation (if applicable)	Allod Energy Ltd
Address/Company Address	Clondargan, Stradone, Co. Cavan
Eircode/Postcode	H12 NV06
Contact Name within Company/Organisation	
Contact Phone No.	
Contact Email Address	
Is the company registered in Ireland for tax purposes?	Yes

1.2 Contact Details (if different from above)	
Full Name	
Address	
Eircode/Postcode	
Contact Name	
Contact Phone No.	
Contact Email Address	

1.3 Agent Representing Applicant (if applicable)	
Person/Agency acting on behalf of Applicant	Gavin and Doherty Geosolutions Limited
Address	Unit A2, Nutgrove Office Park, Rathfarnham, Dublin
Eircode/Postcode	D14 X627
Contact Name (if applicable)	
Contact Phone No.	

Contact Email address	
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1.4 Applicant's Legal Advisor (if applicable)	
Name/Company Name	
Address	
Eircode/Postcode	
Contact Name (if applicable)	
Contact Phone No.	
Contact Email address	

<u>Part 2: Proposal Details (Attach additional documents as required)</u>	
2.1	In relation to this application, have you previously applied for a declaration as to whether or not a licence was required for this usage? If so, please provide the reference number associated with that application.
	No, the applicant has not previously applied for a declaration as to whether or not a licence is required for this usage in relation to this application.
2.2	Specify the Maritime Usage(s) being applied for with reference to Schedule 7 of the Maritime Area Planning Act 2021 as amended:
	Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000.
2.3	Description of proposed Maritime Usage.
	<p>Allod Energy Ltd (“Allód”) propose undertaking marine geophysical site investigations in the Celtic Sea. Allod Energy Ltd will undertake these investigations with the objective of assessing an area in the Celtic Sea for potential subsea hydrogen storage. These investigations will assess the extent and internal character of halite rock beneath the seabed to de-risk any future hydrogen storage development, supporting Ireland’s Climate Action Plan and National Hydrogen Strategy objectives and our transition to alternative fuels and net-zero commitments.</p> <p>Allód are looking to undertake both 2D and 3D surveys. 2D geophysical site investigation activities will enable Allód to understand the conditions of the shallower bedrock beneath the seabed and the conditions of the seabed surface itself for locating future hydrogen storage project infrastructure. 3D seismic surveys offer a detailed, volumetric image of the geological formations at depth, including the shape and size of the subsurface features that is critical for accurate resource assessment and development planning.</p>
2.4	Describe the nature and scale of any structure to be erected in the maritime area.
	No permanent structures will be erected in the maritime area. Ocean Bottom Nodes (OBNs) may be deployed to the ocean floor using a Remotely Operated Vehicle (ROV) for the duration of the surveying campaign and will be retrieved via ROV once works are completed. The OBNs have dimensions of 200x155x75 mm and a weight of 2.5kg in seawater.
2.5	Proposed licence duration and reasons for proposed duration
	<p>A 7-year licence duration is being sought.</p> <p>The intention is to begin survey activities as soon as practicable following license award. A staged programme of investigations will be undertaken, capitalising on suitable weather windows over the licence duration. This phased approach will progress the overall development towards detailed design stage. The exact mobilisation dates will not be known until the process of procuring a contractor is complete, these investigations will be subject to vessel and contractor availability. In anticipation of delays with some of these elements e.g. vessel availability/lead time, weather/season interruptions, data processing timelines, Allod Energy Ltd are seeking a 7-year Maritime Usage Licence.</p> <p>Timing of the site investigation activities is dependent on many factors including weather, tidal flows, availability of vessels and the grant of a licence. The granting of a licence will have a direct effect on the timing of site investigation activities e.g. whether vessel availability would align with the first survey season after licence award.</p>
2.6	Indicative timing of the works/activity: (i) Start date (ii) Duration (iii) Any other information relevant to timing.

<p>Works are intended to commence as soon as practicable following the grant of a Maritime Usage Licence, procurement of appropriate survey vessels and equipment and suitable weather.</p> <p>It is anticipated that the site investigation activities will commence in Summer 2025, subject to grant of licence, vessel procurement process and availability of vessel.</p> <p>Estimated survey duration is 20 days, excluding any weather delays or operational downtime.</p> <p>Ocean Bottom Nodes (if deployed) will be placed on the seabed at the start of operations and retrieved at the end of operations.</p>
<p>2.7 Do the proposed maritime usages provide for public use, commercial use or private use? Provide details.</p>
<p>The proposed maritime usage provides for private use by Allod Energy Ltd, to assess the area for its suitability to store hydrogen beneath the seabed in the future.</p>
<p>2.8 Could the proposed works restrict public use/enjoyment of the nearshore e.g. fishing, sailing, surfing, swimming, walking or other activities? Provide details.</p>
<p>No, the public use/enjoyment of the nearshore will not be restricted as the proposed works will be undertaken approximately 65 km from the nearest landfall.</p>
<p>2.9 Please outline any engagements that have taken place with marine users or other stakeholders in the proposed area that may be affected by the proposal and attach supporting documentation where relevant.</p>
<p>Part of the applicant's ethos and approach to project development is early communication with project stakeholders, local communities including fisheries/seafood sector and marine users. The applicant added a Fisheries Liaison Officer (FLO) to its development team in mid 2023. Since then, the FLO has been engaging with local communities, stakeholders and in particular the fisheries and seafood sector. Owing to the confidential nature of this project during the early stages of assessment/evaluation and the preparation of this Maritime Usage Licence (MUL) application, the FLO has not engaged with stakeholders specifically in relation to this project, however, the FLO has been engaging with some vessel owners (listed on the Irish vessel register) of the fishing/seafood sector that also operate in the Celtic Sea within or near the area of interest of this MUL application. Immediately after this MUL application is published by MARA, the applicant plans to actively engage with all stakeholders including the fisheries/seafood sector to inform them about this proposed project and this MUL application. As part of its preparation for this MUL application, the applicant has prepared a Stakeholder Engagement and Communications Plan (SECP) including stakeholder directory (confidential for the purposes of this application), identifying the stakeholders with potential interest in this MUL application and project, to give one example, the Irish Whale and Dolphin Group (IWDG). The applicant intends to formally inform all of those stakeholders about this MUL application when MARA publish it. The applicant will then continuously engage with interested stakeholders and update its stakeholder directory on an ongoing basis. The applicant plans to carry out some information events to assist with informing stakeholders about the project.</p>
<p>2.10 Describe briefly any consultations undertaken with other relevant authorities (e.g. Local Authority, Port/Harbour authority etc.) or State Agencies. e.g. National Parks & Wildlife Service, National Monuments Service of Department of Housing, Local Government and Heritage.</p>
<p>The applicant's representative met with the Department of the Environment, Climate and Communications (DECC) on 7th December 2023 to discuss the licencing regime under the Maritime Area Planning Act 2021 (MAPA) at which meeting it was suggested by DECC to</p>

meet with MARA. Subsequently, the applicant's representative met with MARA on 25th January 2024 to inform MARA about the project and the applicant's intention to apply for a MUL under MAPA as one of its first steps. MARA noted the project information shared and pointed the applicant to the MUL pre-application process. The applicant's representative made a pre-application on 6th February 2024 and attended a MARA scheduled pre-application meeting on 21st March 2024. After this pre-application process and meeting, the applicant prepared this MUL application (reference number LIC240005).

2.11 Please provide the reference number and title of any existing Foreshore licence you may hold within the footprint, or otherwise in the vicinity of the proposed Maritime Usage area.

N/A.

2.12 Please provide the reference number of any current application for a Foreshore Licence to the Minister for Housing, Local Government and Heritage. Does this application for a foreshore licence relate to or impact any part of the maritime area the subject of this licence application? If so, please provide details of the foreshore licence application.

N/A.

**2.13 What environmental reports, if any, have you submitted with this application?
(Supporting information for screening for Appropriate Assessment/ Natura Impact Statement/ Risk Assessment for Annex IV Species/ Assessment of Impact on the Maritime Usage Report)**

Below reports have been submitted to support this application:

- Assessment of Impact on the Maritime Usage (AIMU) Report
- Supporting information for screening for Appropriate Assessment (SISAA) Report
- Risk Assessment for Annex IV Species (RAAIVS) Report
- Natura Impact Statement (NIS)

Part 3: Location and Spatial Extent of Proposed Maritime Area (Attach additional documents as required)	
3.1	Location of proposed Maritime Usage
	Off the south coast of County Cork, approximately 65 km from the Old Head of Kinsale.
3.2	Total size of the proposed Maritime Area (in m², ha or km², as appropriate).
	1,481 km ² (148,100 ha) of expected survey operations including wide vessel turning circles. Area of resulting survey data is expected to be approximately 150 km ² (15,000 ha).
3.3	Please provide the distance of the main body of the proposed maritime area from the shore at its closest point in km.
	Approximately 65 km.
3.4	Is any of the maritime area in the proposed site in private ownership? If yes please provide documentary evidence of same (e.g. folio).
	No.
3.5	Any other site details considered relevant:
	The depth of the sea within the MUL application area varies between approximately 70m and 120m.

<p style="text-align: center;">Part 4: Maps and Drawings. Please refer to Technical Guidance on map and drawing requirements.</p>	
4.1	Please draft a map, titled “Licence Map”, outlining the proposed Maritime Area in accordance with the Technical Guidance for Maritime Area Licence Applications and submit same with this application.
4.2	Please submit GIS Shapefiles, in accordance with the Applicant Technical Guidance Note and submit same with this application.
4.3	Please list any Admiralty Charts, Maps, GIS Shapefiles and/or other Drawings submitted with this application.
-	GIS Files
-	Licence Map

Part 5: Fishing/Aquaculture Considerations:

5.1

Is the proposal located in proximity to any of the following:

- aquaculture operation
- designated Shellfish Growing Waters
- fish spawning ground
- other sensitive fisheries location

Please Illustrate on appropriate chart including distance in Km.

Further information on this can be found in the AIMU report submitted with this application.

There is no overlap between the Licence Application area and any of the Department of Agriculture, Food and the Marine's (DAFM) aquaculture sites. There are no licenced aquaculture sites within or adjacent to, or in the vicinity of the Licence Application Area.

According to Ireland's Marine Atlas (2021), Horse Mackerel and Megrim use the area as a spawning and nursery ground. Haddock also use the area as a spawning ground, whilst Black Belly Angler Monk, Hake and White Belly Angler Monk use this area as a nursery ground. This is summarised in Table 1, with relevant maps shown in Figure 1 – Figure 10.

Table 1: Application area overlap with commercial fish species distribution areas

Species	Nursery Area	Spawning Area
Black Belly Angler Monk	✓	X
Cod	X	X
Haddock	X	✓
Hake	✓	X
Herring	X	X
Horse Mackerel	✓	✓
Mackerel	X	X
Megrim	✓	✓
White Belly Angler Monk	✓	X
Whiting	X	X

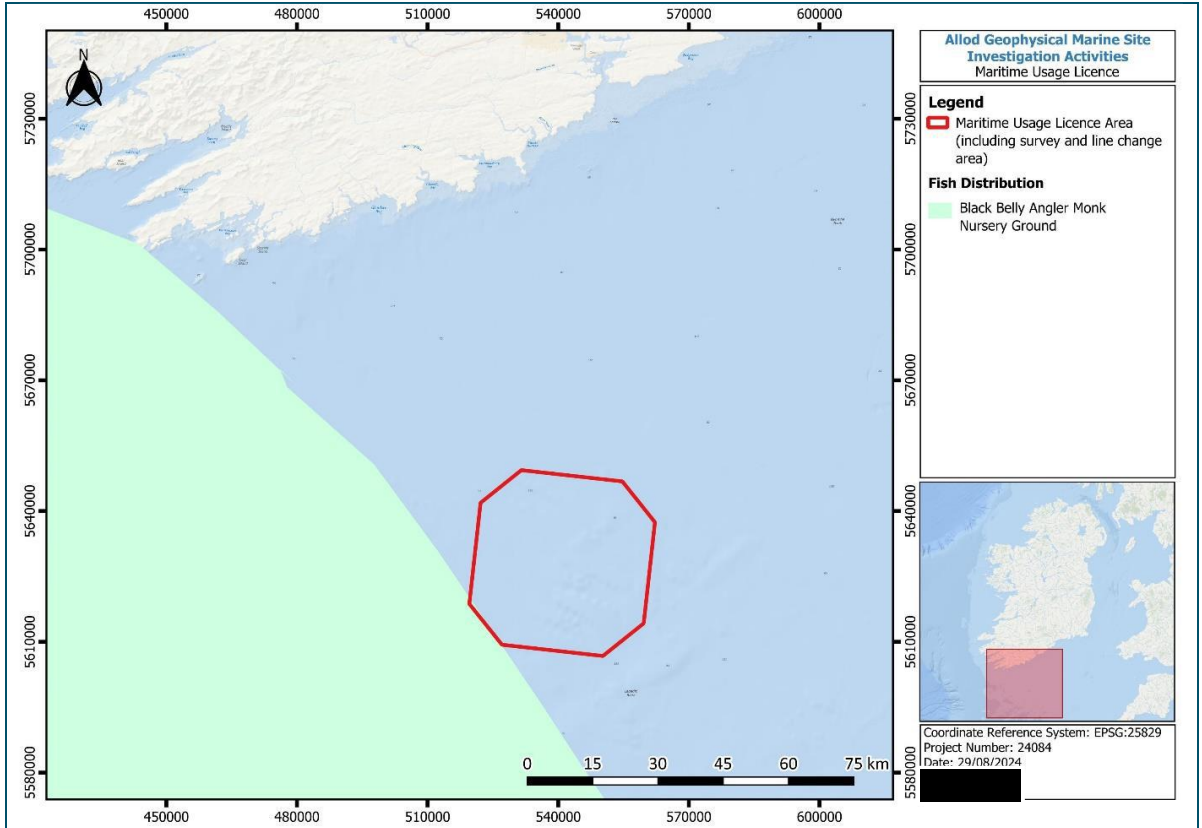


Figure 1: Black Belly Angler Monk Nursery Ground (Ireland's Marine Atlas, 2021)

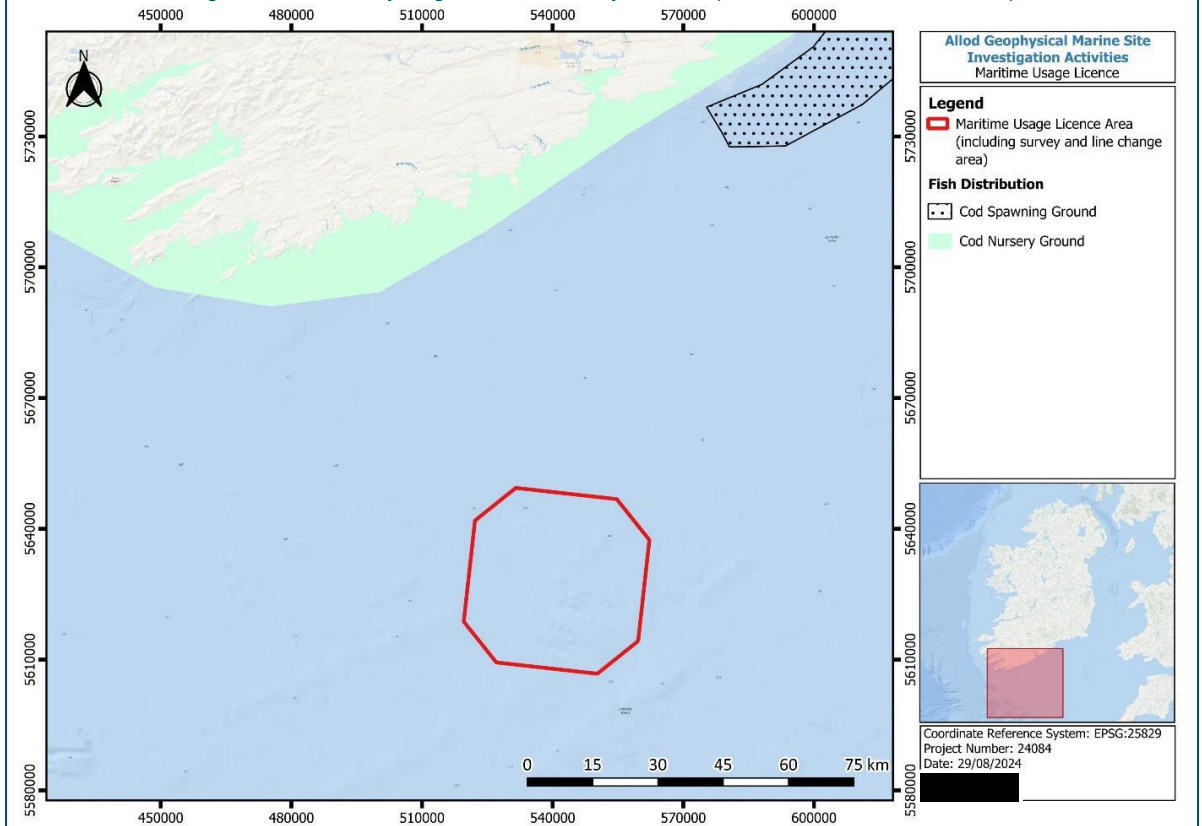


Figure 2: Cod Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

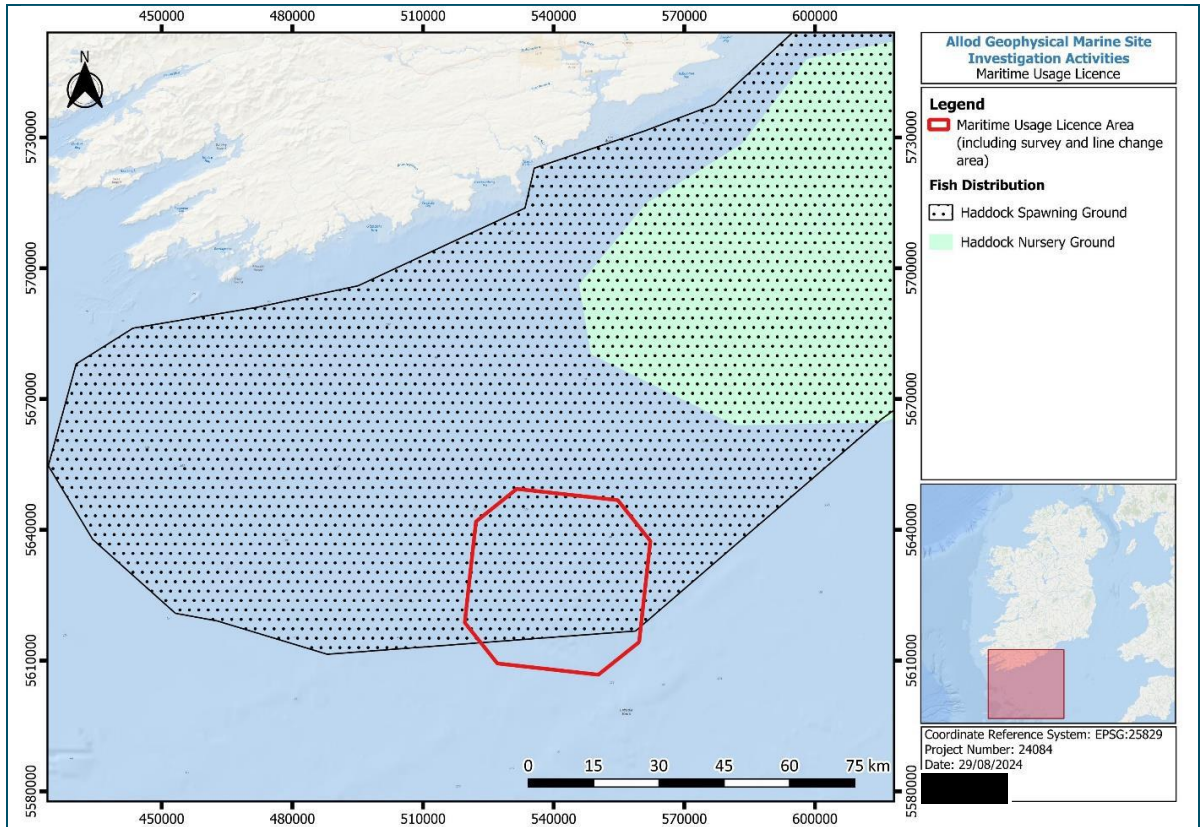


Figure 3: Haddock Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

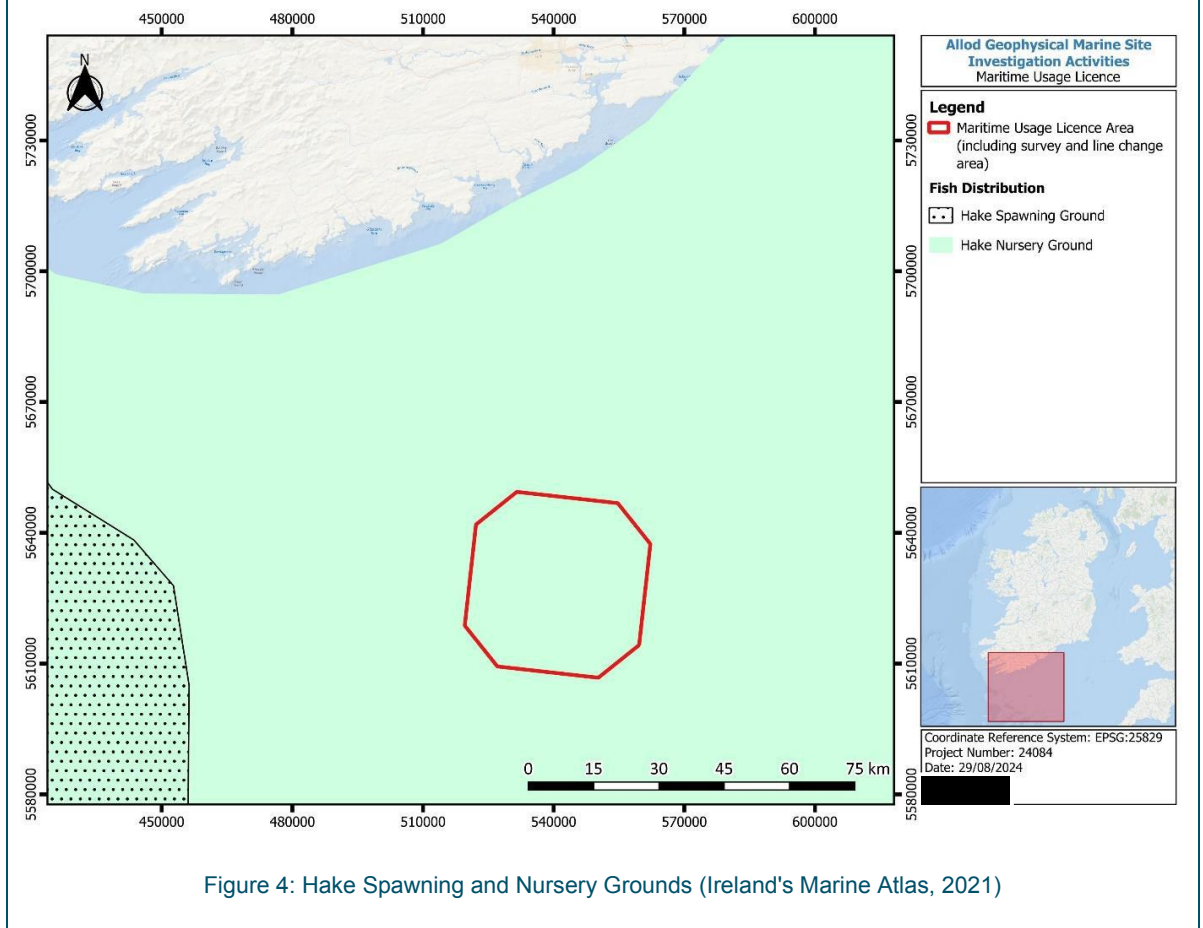


Figure 4: Hake Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

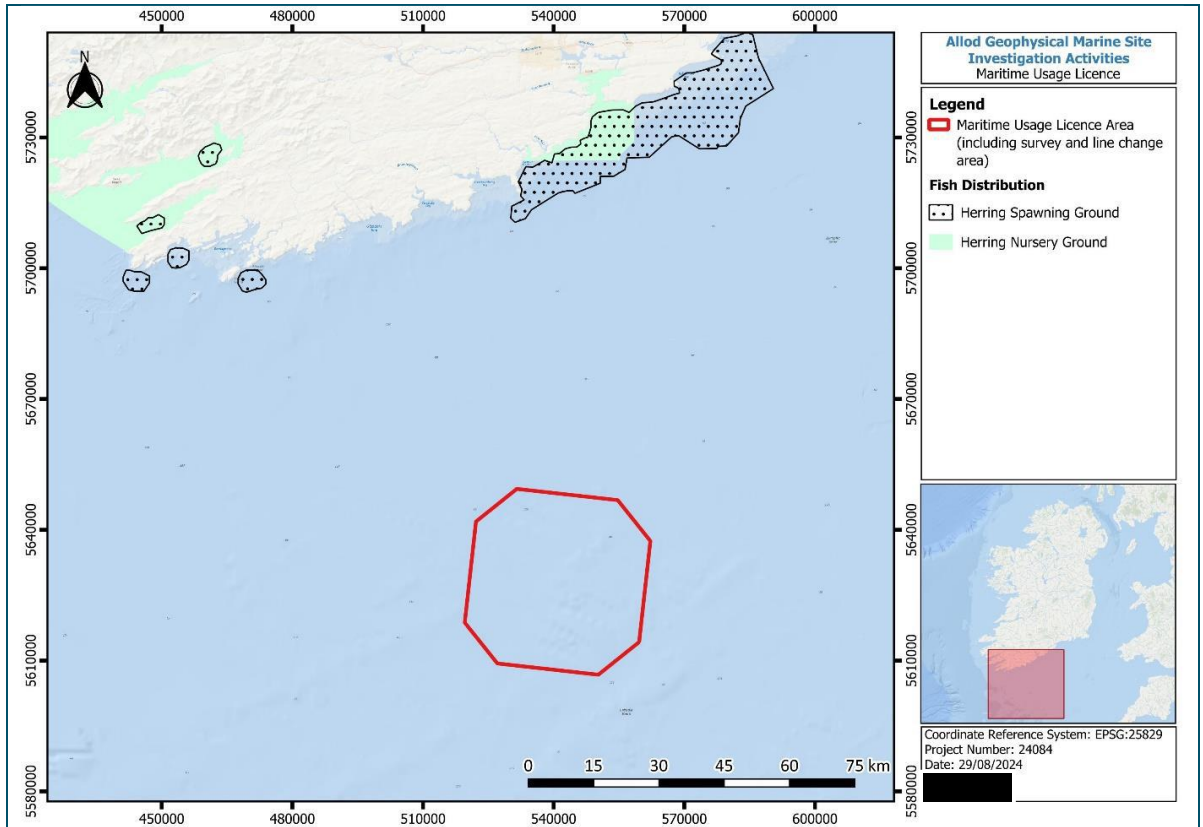


Figure 5: Herring Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

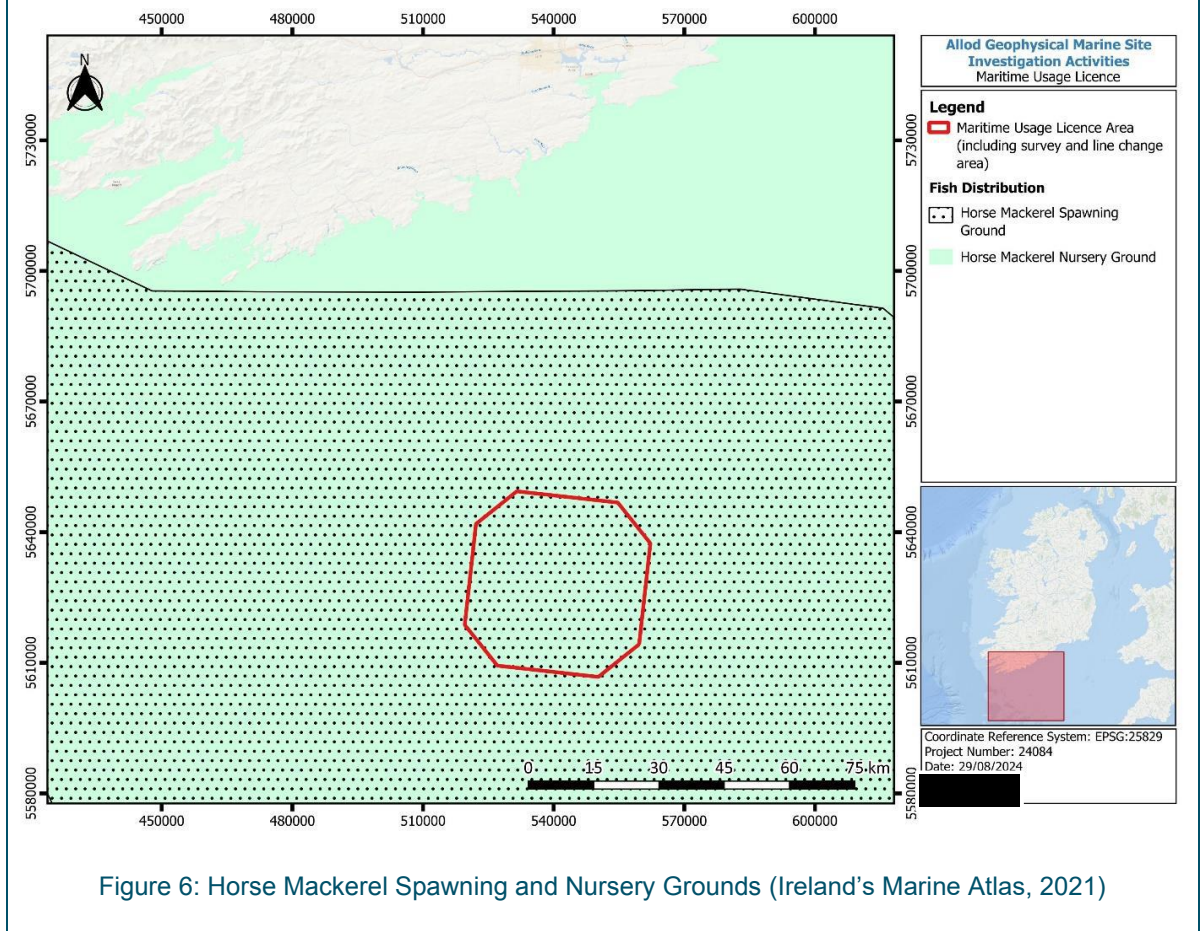


Figure 6: Horse Mackerel Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

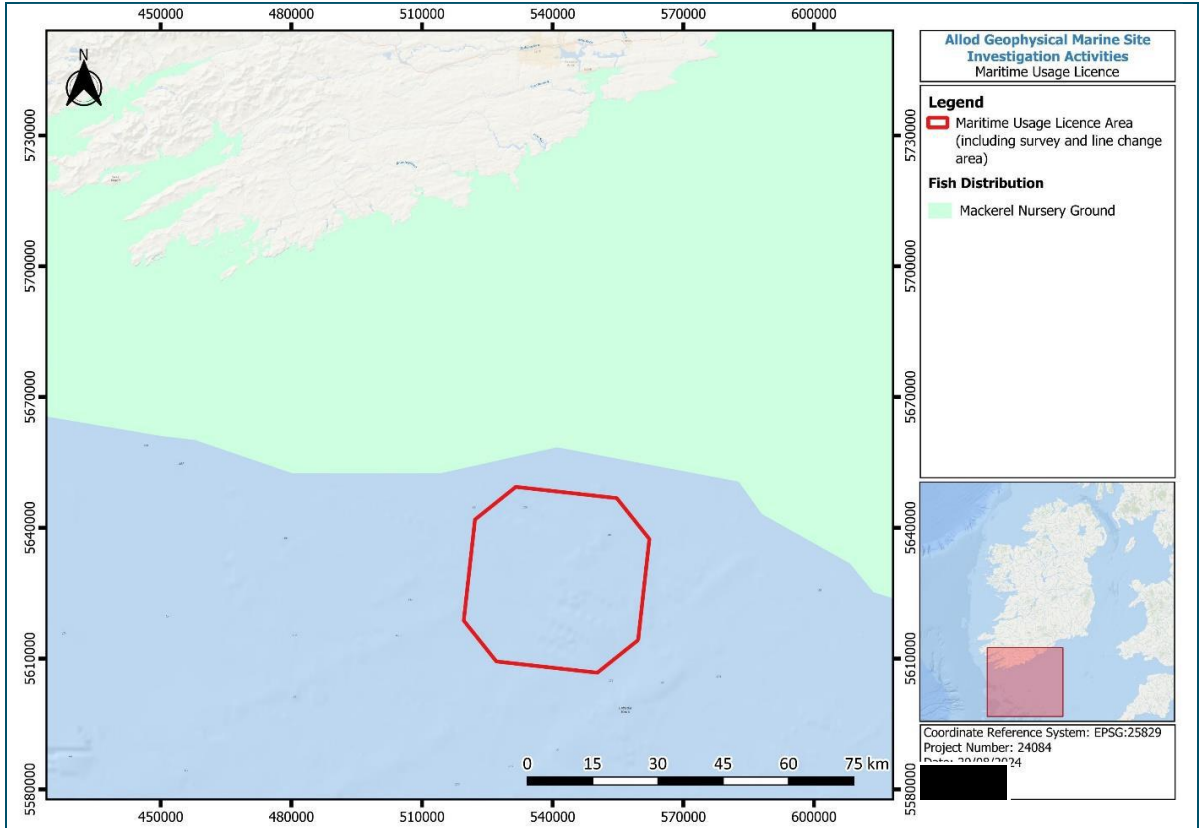


Figure 7: Mackerel Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

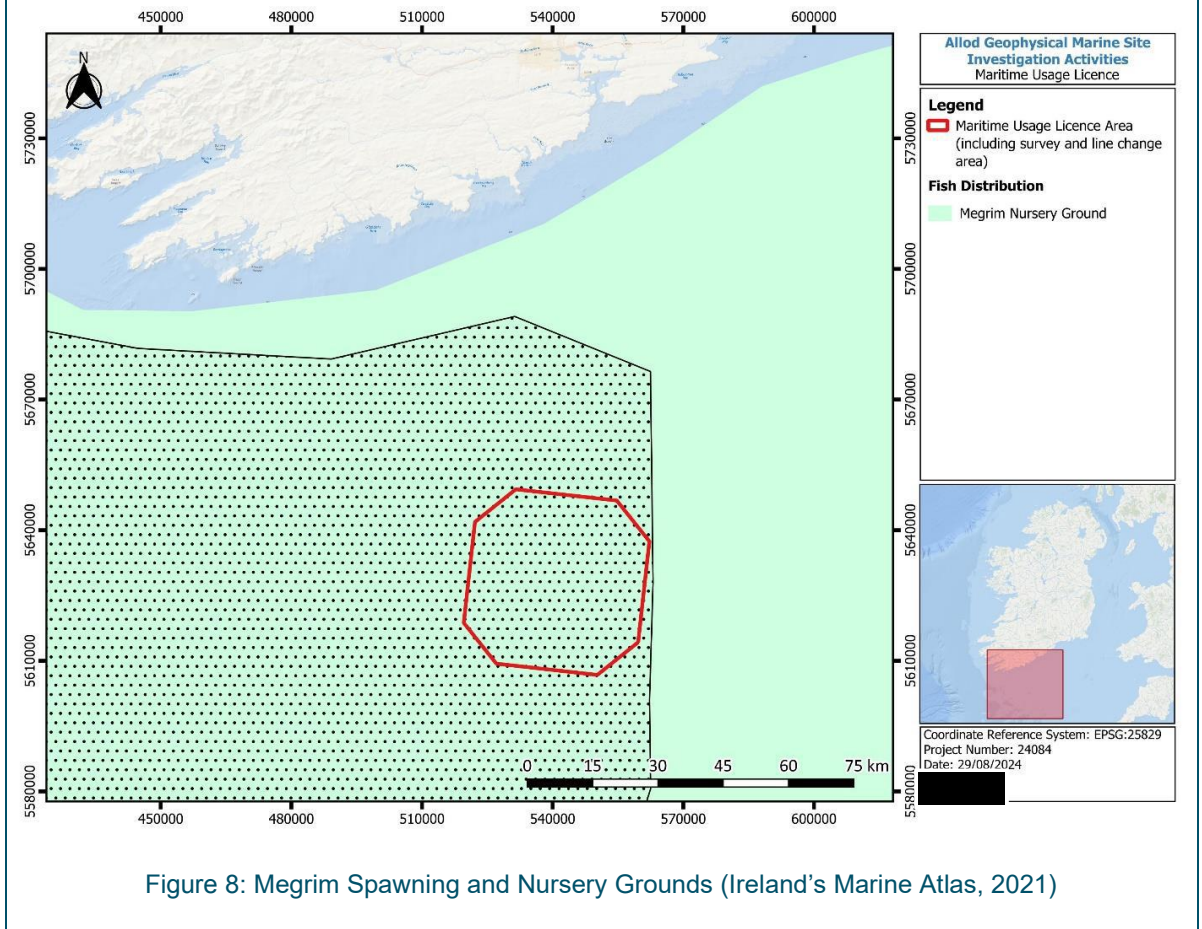


Figure 8: Megrin Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

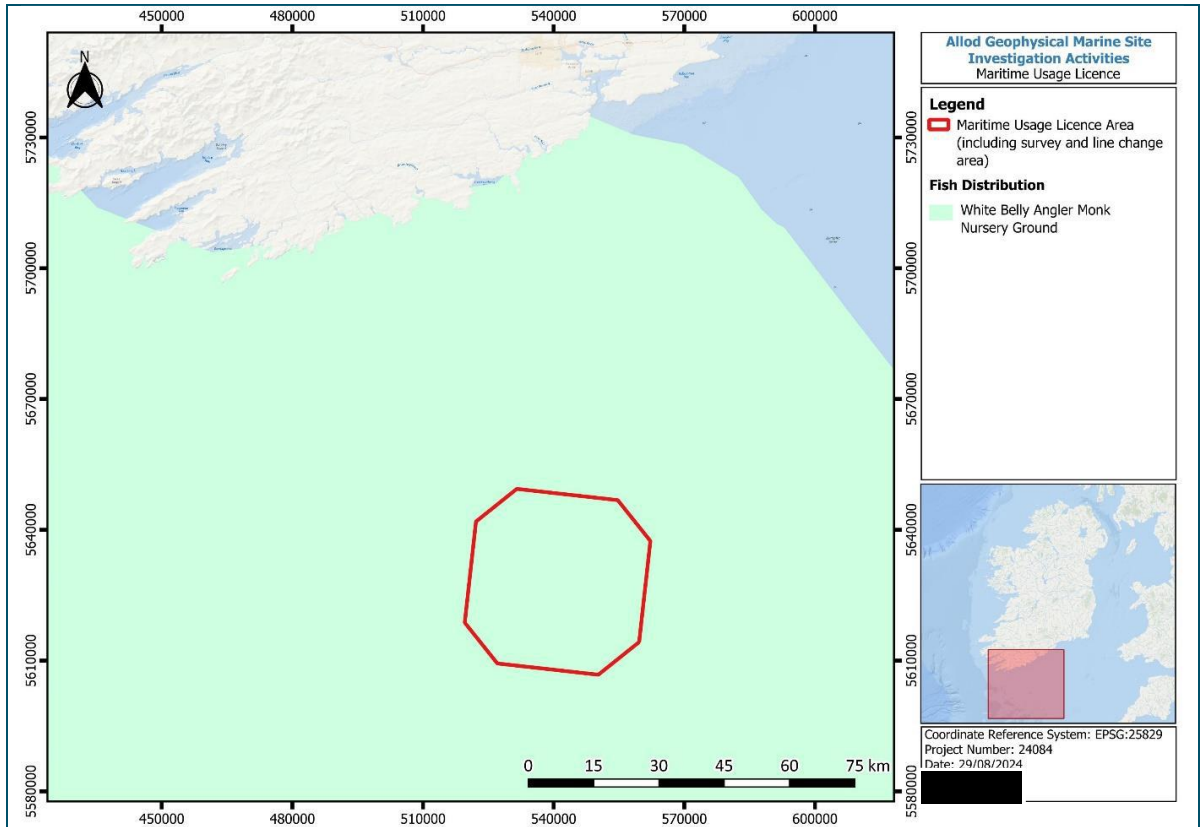


Figure 9: White Belly Angler Monk Spawning and Nursery Ground (Ireland's Marine Atlas, 2021)

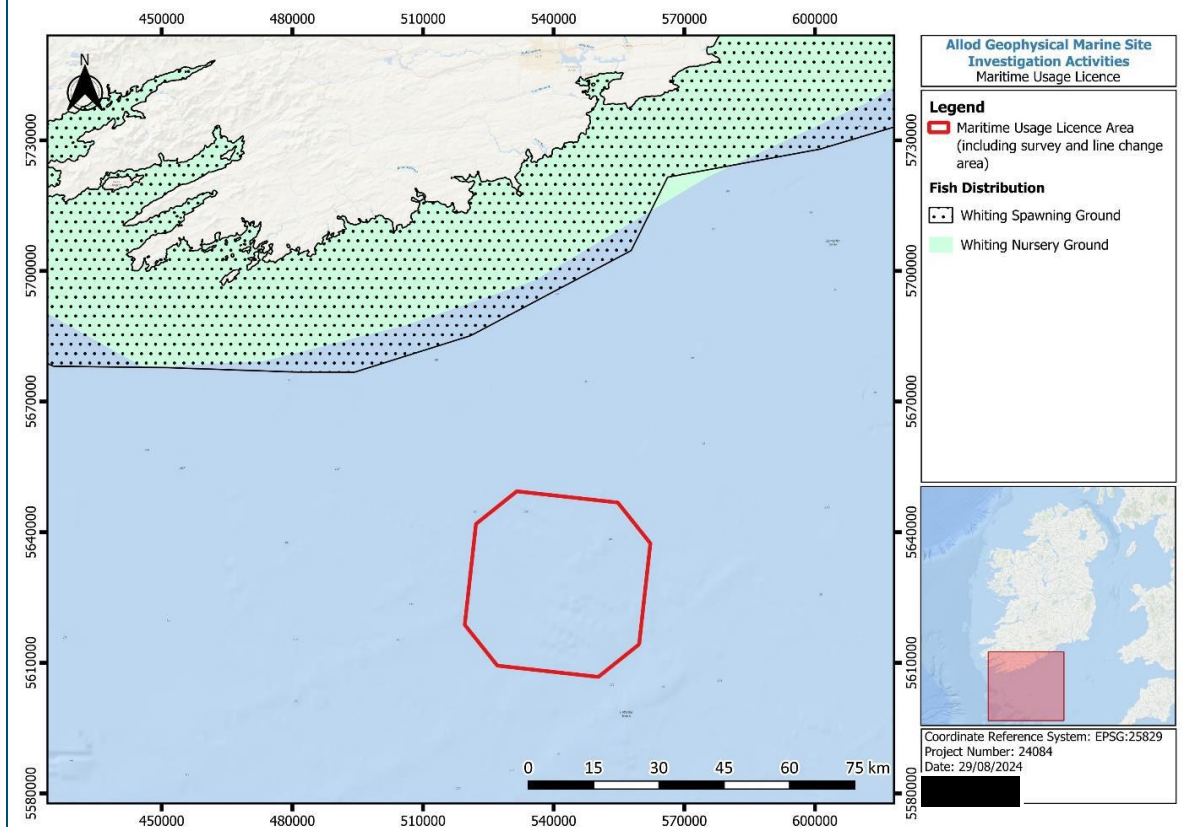


Figure 10: Whiting Spawning and Nursery Grounds (Ireland's Marine Atlas, 2021)

The Licence Area also overlaps with areas with limited recorded beam trawl, and bottom otter trawl fishing activity and moderate seine fishing activity recorded in Ireland's Marine Atlas from 2018 (See Figure 11 to Figure 13).

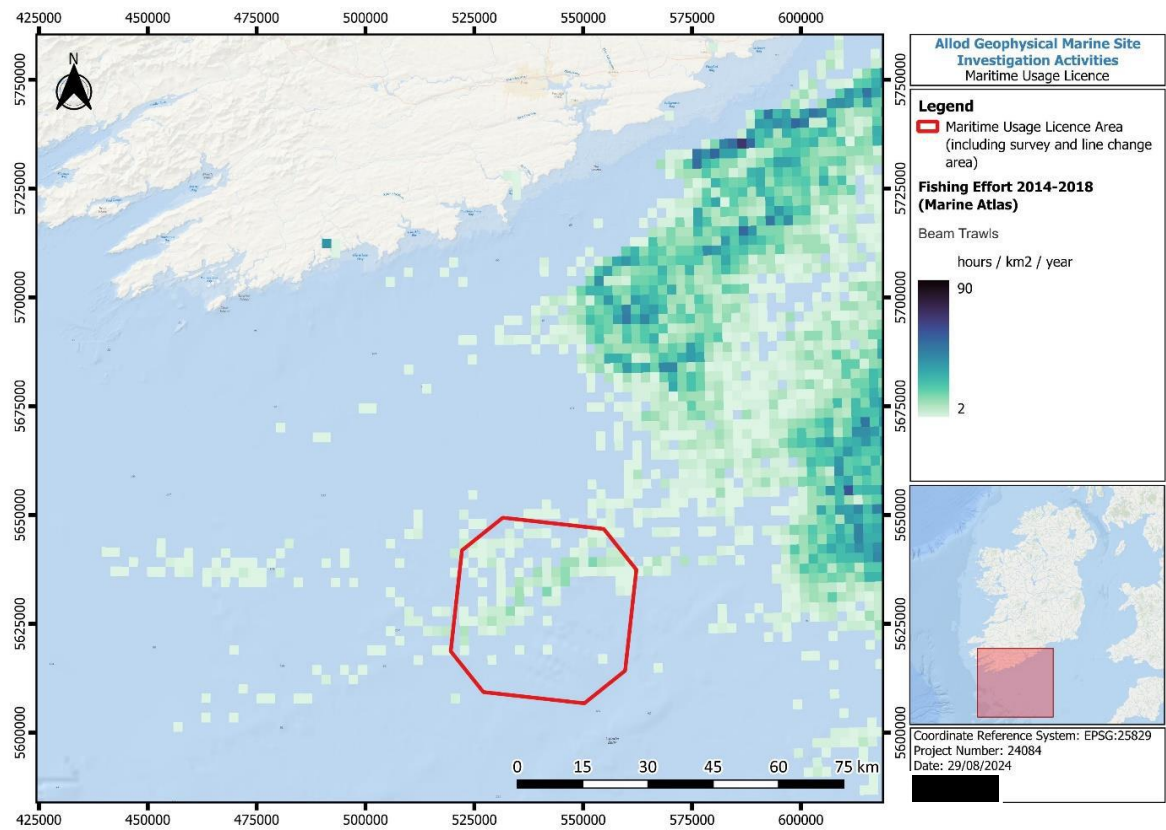


Figure 11: Beam Trawls Fishing Effort in the vicinity of the Licence Application Area in 2018 (Ireland's Marine Atlas, 2021)

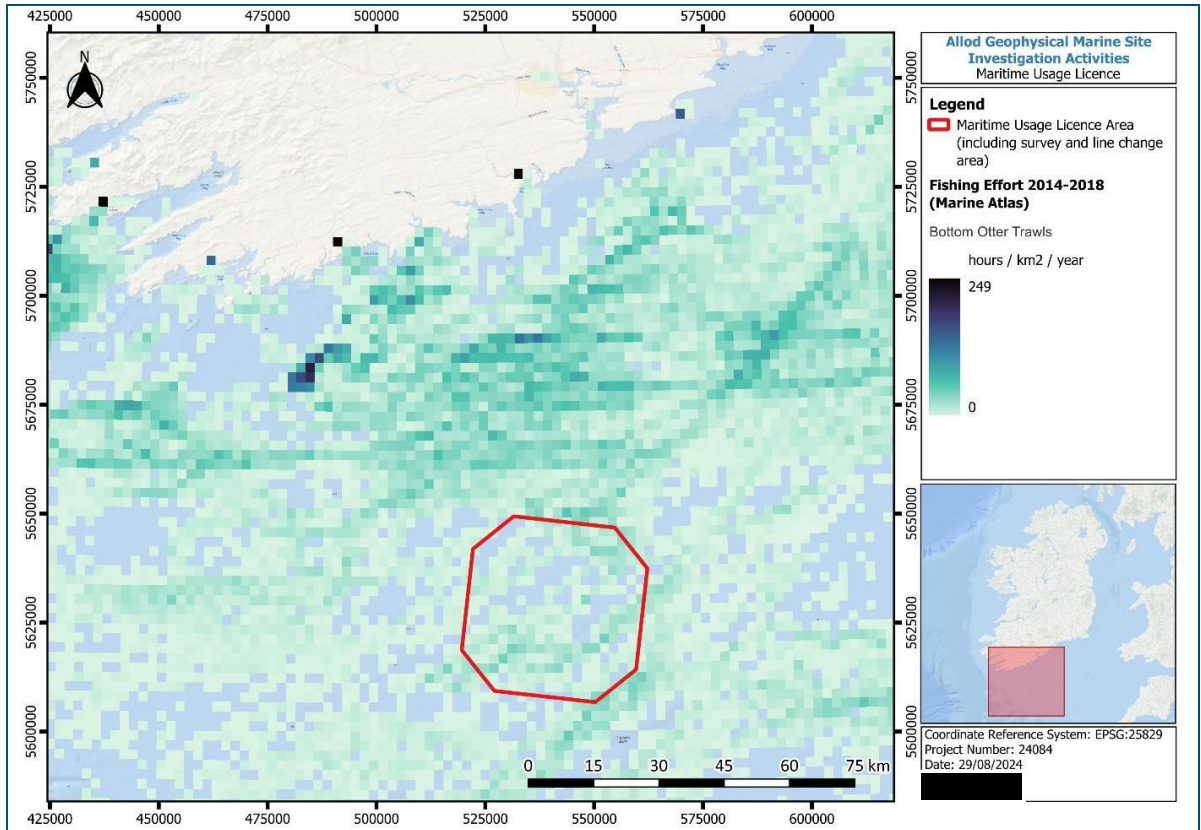


Figure 12: Bottom Otter Trawls Fishing Effort in the vicinity of the Licence Application Area in 2018 (Ireland's Marine Atlas, 2021)

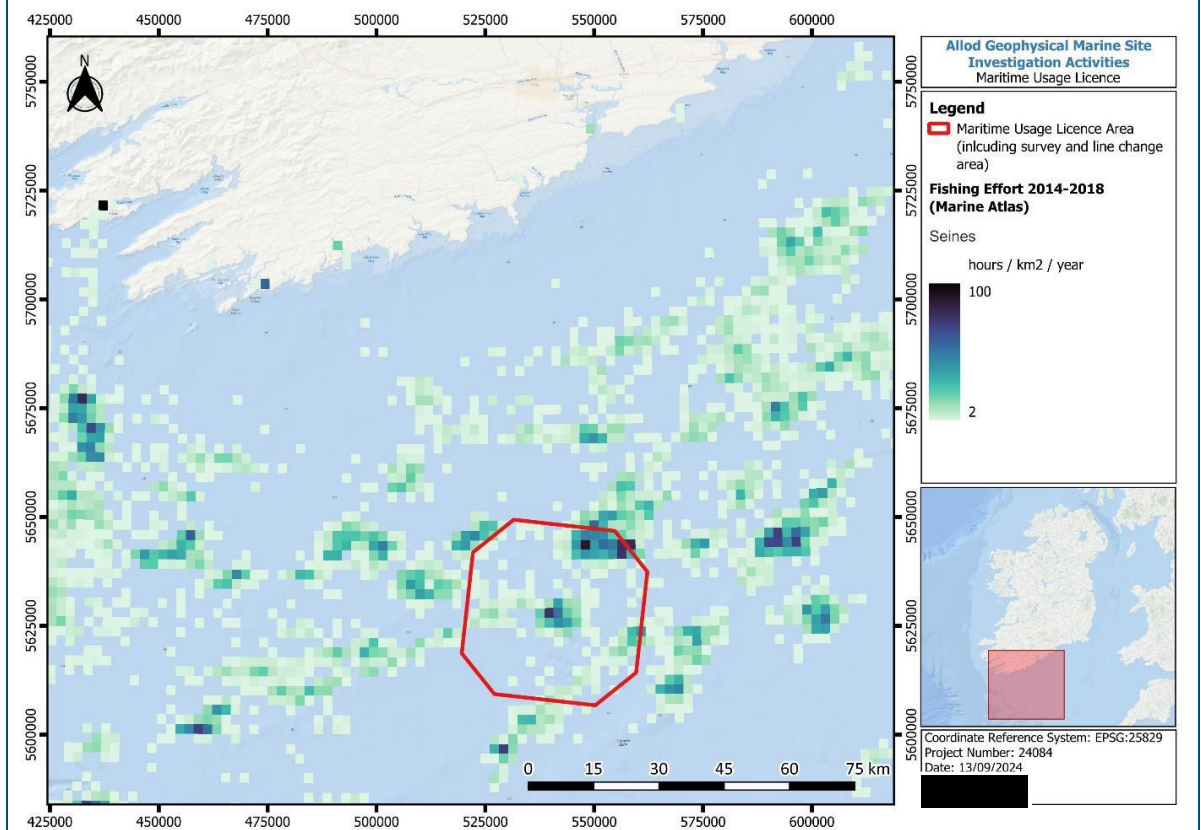


Figure 13: Seine Fishing Effort in vicinity of the Licence Application Area in 2018 (Ireland's Marine Atlas, 2021)

Given the nature, scale and duration of the proposed works, no significant impacts on fisheries are expected.

5.2

Are there other potential impacts of the proposal on fishing/aquaculture in the area? If yes, please describe.

Potential impacts of underwater noise from proposed survey activities on commercial fish have been considered in detail in the AIMU document which accompanies this application.

No significant impacts on fishing/aquaculture are envisaged from the proposed activities.

5.3

Are there any measures proposed to mitigate potential impacts on fisheries or aquaculture? If yes, please describe.

No significant impacts are envisaged from the proposed activities, however, during the proposed survey activities an on-board FLO will constantly engage with other vessels regarding the planned vessel movements for the upcoming 24 hours.

Fishermen will also be requested to avoid the Ocean Bottom Nodes (if deployed).

Declaration and Consent:

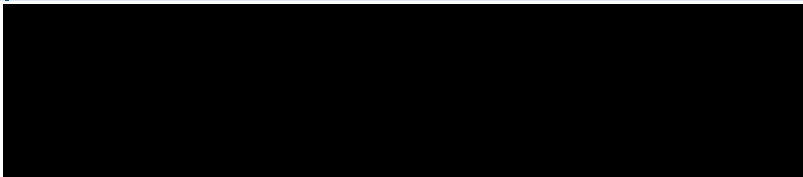
The details provided here are correct to the best of my knowledge.

I understand that no works will be commenced, by the applicant or the applicant's agents on the proposed site, without a valid licence from MARA. The granting of any Maritime Usage Licence will not give rise on the part of the applicant to any expectation whatsoever for, right or entitlement to a grant of any future licence in respect of all or any part of any area of the Maritime Area.

By submitting this application form, the applicant agrees that the details provided (with personal contact details redacted) are to be published on MARA's website and also that the full information provided including contact details are to be processed and retained by MARA and shared with all relevant public authorities in furtherance of consideration for a Maritime Usage Licence under the MAPA.

I give consent to MARA and its agents to copy this application and to make (a redacted) copy available for inspection and copying by the public. This consent relates to this application, to any further information, or submission provided by the applicant or on the applicant's behalf and to the publication of the licence document.

Signed for and on behalf of the applicant:



Herman Busschots

Position Held:

Director

Date:

18/9/24

Applicant Checklist	
Document	Included
Application Form (Parts 2 to 5 inclusive)	<input checked="" type="checkbox"/>
Supporting Information for Screening for Appropriate Assessment (SISAA) Report	<input checked="" type="checkbox"/>
Risk Assessment for Annex IV Species Report	<input checked="" type="checkbox"/>
Natura Impact Statement (NIS), if initially included	<input checked="" type="checkbox"/>
Assessment of Impact of the Maritime Usage (AIMU) Report	<input checked="" type="checkbox"/>
Schedule of Works (contained within the AIMU report)	<input checked="" type="checkbox"/>
Licence Mapping (including GIS Shapefiles)	<input checked="" type="checkbox"/>
Other (Please list below)	

Other