From: Environmental Co-ordination (Inbox)
To: GSPD
Subject: Consultation on Geothermal Policy
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Hello
Please see below comments relating to commercial sea fisheries and the geothermal policy statement for a circular economy. We note the marine area is not explicitly accounted for in this policy, but it is included under the general plan via the marine area planning regime. We also note "there is little data on the deployment of geothermal technologies in the marine environment and no commercial scale marine-based projects at European level." Current ocean thermal energy conversion (OTEC) technology worldwide relies on volcanic or tectonic activity heating the water, such as installations in Hawaii & India.

That said, if marine geothermal installations were to be built in Irish waters, commercial sea-fisheries would need to be accounted for in the plans. Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. It is essential that any negative impacts on fisheries are avoided. The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, and taken into account. Further, and unnecessary impacts on hatcheries or spawning grounds should be avoided as much as is possible.

Noting current OTEC technology has little data on it, it is vital to ensure as much data collection is carried out and scientific knowledge gaps are plugged before any construction in the marine environment commences. It is vital that an early and full assessment of the impact on fisheries is explicitly included in the process of assessing the impact OTEC would have on the marine environment and natural capital. The marine environment is vastly different to the terrestrial environment and has an entirely different set of environmental concerns.

In terms of possible interactions between fisheries and marine geothermal energy exploitation we can only make some very generic observations without more investigations being carried out:

- Where there is spatial overlap with fishing, there is potential for displacement of fishing activities.
- There may also be indirect interactions through potential environmental effects which may include damage or loss of habitat; sediment clouds that can smother or otherwise affect marine life; noise pollution and/or other kinds of pollution.

Kind regards

An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh,
Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |
An Roinn Talmhaíochta, Bia agus Mara
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Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolais san ríomhphost seo, agus in aon ceangláin leis, faoi phribhléid agus faoi rún agus le h-aghaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scrios an t-ábhar ó do ríomhaire le do thoil.