

**AP2/3/2017**

**COISTE TIMPEALLACHTA AN  
GHAOITH**

**SITE REF: T12/419A  
T12/419B&T419C**

**APPEAL**



**sNOTICE OF APPEAL UNDER SECTION 40(1) OF  
FISHERIES (AMENDMENT) ACT 1997 (NO. 23)**

Name and address of appellant: Coiste Timpeallachta an Ghaoith, f/ch Áislann Rann na Feirste, Rann na Feirste, Leitir Ceanainn, Co. Dhún na nGall.

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All correspondence to the Manager of Local Development Body:  
Aodh Mac Ruairí, Bainisteoir Áislann na Feirste



**Subject matter of the appeal:** Fisheries (Amendment) Act, 1997, (No. 23) Foreshore Act, 1933, (No.12) Notice of decision to grant Aquaculture and Foreshore Licences to Celtic Kerber Ltd., Braade Strand – Gweedore Bay, as published in the Public Notices in the Donegal Democrat 15 December 2016.

.....  
**Site Reference Number:-**

T12/419 A, B and C,

**Appellant's particular interest**

**in the outcome of the appeal:**

Appellant's live in the Rann na Feirste, Rann Mónadh, Carraig Fhinn and Bráid townlands on each side of the Braade -Gweedore Bay. All appellants interested in this issue live in this area, east west and the north of the bay which is reflected in the membership of our committee. The overwhelmingly majority of us have lived here all our lives. We recognize that Foreshore is a very beautiful and important element of our everyday life. A significant recreational resource and a cultural & natural heritage repository.

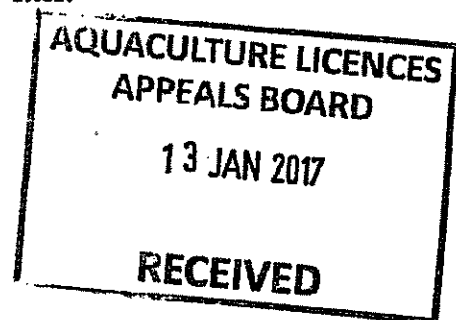
At a Public Meeting held in Áislann Rann na Feirste, (Ranafast Community Centre) on the 12 December 2016, concerns were raised over the issue of further Aquaculture and Foreshore Licences for the bay, as in the site references above. Areas in the bay where

there was no previous shellfish farming. Coiste Forbartha Rann na Feirste(Rann na Feirste Development) agreed that a sub-committee would be formed to appeal the Aquaculture and Foreshore Licences site: T12/419 A, B and C are among these licenses. Following the meeting residents from Carrickfinn and Bráid join the committee. The committee was called *Coiste Timpeallachta an Ghaoith*.

Nobody from the Rann na Feirste, Rann na Mónadh or the members of our committee from southern Carrickfinn side of the bay are involved in shellfish farming but it was quite clearly stated at the meeting that the Development Committee and the community at large supported the existing Aquaculture, overwhelmingly concentrated in the central Eastern part of the Braade –Gweedore Bay and was at a far smaller scale than the latest Licences in the bay as published in The Donegal Democrat 15 December 2016. Our concern was with the new areas being developed for shellfish, the vastly increasing scale of these operations in comparison to what existed, the lack of consultation by the shellfish farmers with the community about the scale and number of new sites. None of these developments would be in sympathy with the natural landscape or the inherited cultural landscape of Rann na Feirste, Rann na Mónadh, Southern Carrickfinn and the neighbouring vicinity.

We know all the local people involved in shellfish farming currently, owners and employees. They all are fine people from our community. We have no personal grievance with them or their current shellfish farming projects. Our concern is with the alarming expansion in scale of the four new licenses and nine new sites.

Outline the grounds of appeal (and, if necessary, on additional page(s) give full grounds of the appeal and the reasons, considerations and arguments on which they are based):



**Scale and Visual Impact:**

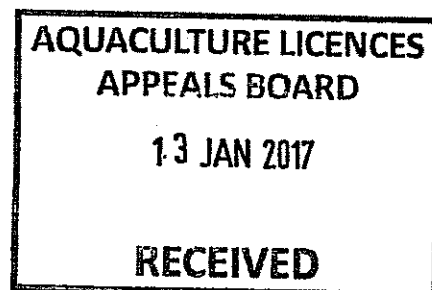
The Rann na Feirste Development Committee organised a public meeting in Áislann Rann na Feirste on the 12th of December 2016. At that meeting, support for the existing Aquaculture was confirmed and agreed by the majority. This agreement was reached on the basis that the operation was concentrated in the central eastern part of the Braade – Gweedore Bay, an area which is much smaller in scale than the areas identified in the licences that were published in The Donegal Democrat, 15 December 2016.

According to the published information, four new licenses were granted, which include nine separate sites that cover almost 99 acres. This represents a dramatic increase in scale, both in the number of sites licensed and the area covered by those sites. Prior to the granting of these licenses, four shellfish sites operated in Braade –Gweedore Bay. The current licenses allows for a tripling of sites, from 4 to 13 and staggering increase in area, which is seven times larger previous developments.

It is a matter of concern that all the new licenses were granted without any community consultation, despite that fact that the Braade Strand Map produced by the Department Agriculture, Food and the Marine clearly indicates that the shellfish developments outlined in red/pink will become the prominent physical feature in our bay. There was disquiet with the lack of equitable consultation and sharing of information with other legitimate stakeholders in the community.

In a Special Area of Conservation this represents a significant expansion of the previous shellfish licenses awarded, a growth which is almost on an industrial scale for such a narrow channel. It will have a dramatic visual impact on the foreshore and detract from an area of outstanding natural beauty, which has been a natural resource for this community for centuries. Its importance is clearly recorded in its literature and song and in many of the customary traditions associated with this foreshore.

A review of the scale of the proposed licenses is necessary if we are to retain this important natural resource.



The increase in scale will necessitate a move from linear narrow stripes of trestles along the tidal stream between Braade/ Carrickfinn and Rann na Feirste/ Rann na Mónadh to far larger blocks of steel trestles, which will have to be situated further away from the depression and low line of the tidal stream, to higher ground which will make the trestles far more visible to the communities living on both sides.

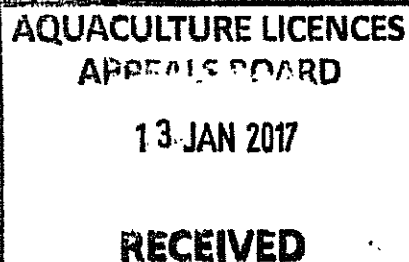
**The following sites present particular difficulties as in the *Determination of Aquaculture/ Foreshore Licensing*: Sites T12/419B; T12/419C; T12/419A**

License T12/419 B is proposed for one of the most culturally iconic sites on the foreshore. It is where the first Rann na Feirste GAA Pitch was formed in the dry summer months in 1920 by the Irish author Seosamh Mac Grianna and is still used today for recreational activities today. So iconic is this place that a picture of it was chosen by the Rann na Feirste community for front cover of their community CD, *Ceol Cheann Dubhrann, Ceol agus amhráin Rann na Feirste*. A CD to collect funds for the community development centre( A copy of the CD enclosed). Seven of the nineteen songs are composed about this very foreshore.

**We believe that the Department needs to review Ministerial Determination in relation to EIS requirements for an Aquaculture Licence application for the cultivation of shellfish by Celtic Kerber Ltd. (T12/419 A, B and C) in Braade Strand, Gweedore Bay, Co. Donegal:**

- i) no significant impact on recreational use of the adjoining foreshore.

The *Determination of Aquaculture/ Foreshore Licensing* for Site T12/419B will be situated on the highest part of the bay. The local name for a significant section of this location is an *Oitir Mhór*, which means 'the large sandbank' in Irish. It is the shallowest part of the bay at full tide, having a tidal range of 4 metres. At low tide trestles will barely have one foot of coverage. An *Oitir Mhór* is the deepest sandbank in the area and it moves regularly for a number of reason. It is effected by the confluence of the Crolly and



Murlough tidal streams and by the output of the Clady Hydro scheme. The banks are neither stable nor stationary, and are very soft during prolonged periods of flooding. This is also true of site T12/419C, known locally as the Oitir Ritigh, meaning 'the steep sandbank'. The natural tidal conditions in both these sites will present difficulties for oyster farmers as trestles will sink and retrieval and the constant re-siting and management of trestles will lead to increased activity and disruption particular as T12/419B is the furthest from the road.

These two areas T12/419B and T12/419/419C encompass the largest sandeel bank in the area and the this part of the strand is known as *Trá na gCorr* (Sandeel Strand) and has been a traditional recreational area for digging sand eels (Pic 1a, digging sandeels at *Trá na gCorr*). Although the sandeel is not a protected species In The Republic of Ireland, it a priority species in Northern Ireland and the UK (source [habitas.org.uk](http://habitas.org.uk)). These species are are recognized as an important food source for wild sea trout and birds like terns, red throated divers, these are protected species in this Bay (Natura 2000)

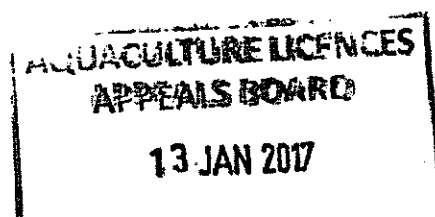
**The Determination of Aquaculture/ Foreshore Licensing for Site T12/419A, clause:**

*b) Public access to recreational and other activities can be accommodated by this project.*

The reality is that this license for Site T12/419A, of 7.38 hectares will block off a tidal ford used by the communities for centuries and is "*partially outside the designated*" shellfish area. (Clause A in the *Determination of Aquaculture/ Foreshore Licensing for Site T12/419A*)

*(Map Reference 2a – Site T12/ 419a with the tidal ford marked in black pen ).*

Site T12/419A incorporates *Fearsaid na Bráda* (the Braade tidal ford) at the Northern head of Rann na Mónadh (Rinnamona). This is the shallowest point in the channel in the southern part of the bay and has been recorded as a crossing point for walkers since 1736.



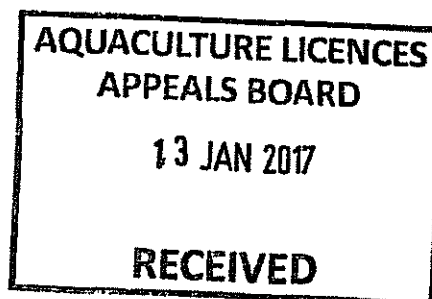
It is such a significant tidal ford that it gives its name to Rann na Feirste (from the old Irish 'Fearsaid' plus 'Rann', meaning 'the peninsula by the two fords'). The crossing continues to be used by all communities in the bay, young people going to train on the GAA pitch in Carrickfinn, by hundreds of students at the Rann na Feirste summer college, by walkers, swimmers visitors and school children. This crossing point will be obstructed by trestles.

*J) No effects anticipated on the man-made environment heritage of value in the area.*

In the case of license for Site T12/419A, we strongly disagree with the assertion that no effects are anticipated on the man-made environment heritage of value in the area and would question the criteria used to make this assessment. Proper engagement with local communities would have revealed quite a different story. The importance of the area to our own communities and the nation's cultural and maritime heritage is well attested. As noted by Ciara Breathnach in her work on the Congested Districts Board (2005) the

"... seaweed industry in the North West was much more significant than fisheries."

From the 18th Century onwards, each family in the Rann na Feirste townland, and in neighbouring townlands had family plots on the foreshore from which they harvested seaweed as a soil improver. The plots are either square or rectangular and contain grids of rock in a variety of patterns. Each plot is separated by a path which roughly equates with the width of a cart. These "man-made" features are known as a *Srathóg* or *Srathógaí*. The fact that no English exists for these terms is testament to their uniqueness, although references to their existence and use, are to be found in the literature and oral culture of the area (*Nuair a bhí mé Óg*, Séamus Ó Grianna, (1942:154); *Srathóg Feamnaí agus Scéalta eile*, Pádraig Ó Baoighill, (2001). They are an important aspect of our material heritage and have existed practically undisturbed for over two hundred years. They are currently being destroyed to make room for steel trestles. This can be investigated in the review.





For our communities, the communal seaweed plots are defining feature of our foreshore, they speak to a history of communal activity and to the value of the natural resources that have been available from time immemorial to coastal communities. In the context of the European Union, there are very strong directives regarding heritage and "shared cultural areas"(EC2005). These features are monuments to our past and deserve to be preserved and protected for future generations(Photograph 1: Srathóg – man -made environment).

**Appropriateness of Ministerial Determination in relation to EIS requirements for an Aquaculture Licence application for the cultivation of shellfish by Celtic Kerber Ltd. (T12/419 A, B and C) in Braade Strand, Gweedore Bay, Co. Donegal.**

**We conclude that the Minister may not have been appraised of the full facts and that the outcome of his determinations in relation to EIS requirements, for the license by Celtic Kerber Ltd. (T12/419 A, B and C) in Braade Strand, Gweedore Bay, Co. Donegal, are not based on a full and accurate assessments.**

*The Reasons and Considerations* of his determinations state:

**d) the surrounding area is not densely populated.**

**This could not be further from the truth, on every side of the bay:**

**"The three parishes of Na Rosa, Gaoth Dobhair and Cloich Cheann Fhaola constitute the main centre of population of the Donegal Gaeltacht and with a population of just over 16,000, is considered to be the most rurally populated area in Europe;"**

**Source :<http://www.udaras.ie/en/an-ghaeilge-an-ghaeltacht/an-ghaeltacht/dun-na-ngall/>**



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Total population of Rosses and Gweedore is 11983.

Rosses Population – 7260 Gweedore – 4723

Population of Rann na Feirste – 325 people live on 525 acres (The size of some Dairy Farms in Munster).

Link to census mapping

Source: <http://airo.maynoothuniversity.ie/external-content/donegal>

(this link breaks down population and housing stock)

These determinations and assessments are not appropriate for this community, none give any credence to these Irish Speaking communities and their unique coastal culture, not even the public notice in Irish or at least bilingual. They are generic determinations and that there has been no analysis or grasp that this a unique coastal community. Not a single mention of Gaeltacht or its unique culture, anywhere.

**Scale and effects on water quality**

Although the current Gaoth Dobhair Bay is " *Classification B* " as in the Determination of Aquaculture for these sites. There is also the very important issue of water quality in the bay. Will the present water quality be able to support the dramatically increased scale and should this effect the sanctioning of increased licenses for food producers or oyster farming. Oyster farmers have several interest groups whose demands must be satisfied and customers require high quality produce and increasingly consider environmental and ethical values when choosing a product. Environmental concern, sound environmental practices and image will reflect on the marketing of such products. The Environmental Protection Agency (EPA) in 2013, have already concluded that the Annagry Waste Water

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Treatment Plant was at an insufficient level of treatment, algal blooms are very evident on calm days in the tidal stream between these oyster farming sites. The EPA's report stated:

#### ***Existing Treatment Plant***

*The plant is located to the west of the village beside the seashore. The town treatment plant comprises a horizontal flow-settling tank.*

*The purpose of any settlement tanks is to reduce the velocity of the incoming wastewater stream thereby allowing the settleable solids to fall to the bottom of the tank. Typically 50-70% of suspended solids are removed in these tanks. The efficiency of the tank is dependent on a number of factors ie; Type of solids present, design criteria and sludge withdrawal from the tank.*

*After primary treatment in the tank the treated effluent is discharged via a long sea outfall to Gweedore Estuary.....*

#### ***Proposals for future upgrade***

*Annagary is not listed on any development programme at present. The septic tank has a design capacity of 500 p.e. The present day PE equates to 473.*

*The treated effluent from the septic tank discharges to Gweedore Bay and Islands SAC and Gweedore Bay and Islands NHA. The existing septic tank serving Annagary provides an insufficient level of treatment to the waste water generated in the catchment. A new Waste Water treatment plant is required to provide, as a minimum, Secondary Treatment to the wastewater to cater for future development of the area and to comply with all European and local government directives.*

Article 34 of the Common Fisheries Policy Regulation requires Member States to prepare multi-annual national strategic plans for aquaculture. *The National Strategic Plan for Sustainable Aquaculture Development(2015), states:*

*The industry, supported by BIM and MI, should continue to develop environmentally sustainable fishing and aquaculture production methods to*

*secure a sustainable resource base and to underpin the development of a smart, green and clean image which contributes to the overall strategy for the food industry.*



**Economic Impact:**

*"The proposed aquaculture should have a positive effect on the economy of the local area", according to clause C) of each Determination of Aquaculture/ Foreshore Licensing concerning the four licenses that are the subject matter of this appeal. But consideration must be given to the negative impact which such a development may have on the local economy.*

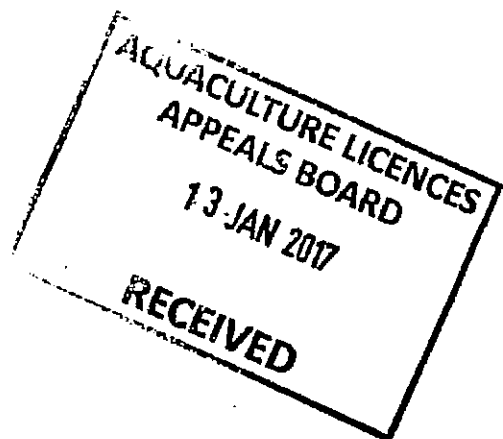
Donegal is widely regarded as an area of outstanding natural beauty and is renowned for its long picturesque coastline, and unspoilt natural habitats. 'The Beautiful Scenery' was the main reason cited by tourists for choosing to holiday in the county according to tourism studies. In one such study, 80% of respondents credited the 'Beautiful Scenery' as their primary reason for recommending the area. These figures therefore serve to highlight the significance of protecting and promoting the topography of the county in order to sustain and further develop the tourism sector here (*Fáilte Ireland, (2013) Holidaymaker Study 2013 – Donegal*).

Therefore it is important to note that scale of expansion on this narrow picturesque channel( as illustrated in diagram below), arising from four new licenses and nine new sites will make the dramatic expansion of these shellfish trestles, the prominent physical feature of this bay.

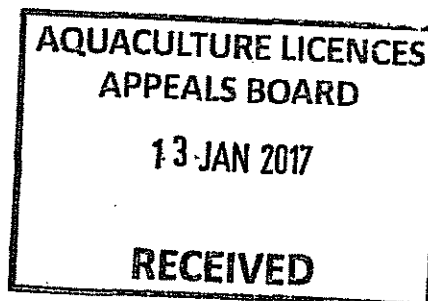
**We conclude that the Minister may not have been appraised of the full facts and that the outcome of his determinations in relation to EIS**

requirements, for the license by Celtic Kerber Ltd. (T12/419) in Braade Strand, Gweedore Bay, Co. Donegal, are not based on a full and accurate assessments with regard to:

- a) the nature and scale of the proposed aquaculture activity, (oysters in bags and trestles on 3 sites covering 16.07ha) relative to the body of coastal water in which it is located
- b) the limited magnitude and extent of the direct impacts arising from the proposed aquaculture activity



(Source: An Roinn Talmhaíochta, Bia agus Mara (2016) Scale 1:24,000; new licenses in bold by Coiste Timpeallachtaán Ghaoith).



Aquaculture management can impact negatively on lucrative recreational activities and amenities such as fishing, water sports and ecotourism to name a few. This favourable marine environment facilitates the use of the bay for any great number of leisure purposes, many of which have traditionally been enjoyed by locals and visitors to the area alike.

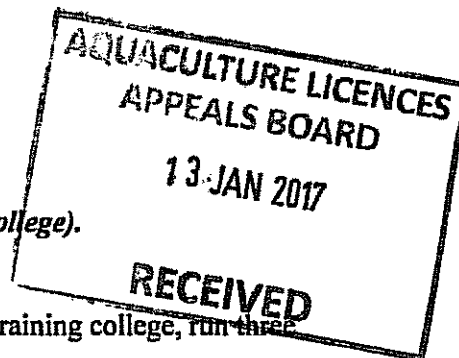
The tourism industry supports in excess of 29,000 jobs in the region and is responsible for attracting approximately 174,000 overseas visitors each year, while a further 500,000 domestic visitors come to Donegal to enjoy – amongst other things - our clean beaches and waterways(Donegal County Council, (2014), “DONEGAL’S TOURISM PRODUCT DEVELOPMENT.” Accessed October 03, 2016.

<http://www.donegalcoco.ie/business/developingourtourismsector/>).

The Donegal Gaeltacht is one of the largest of the Gaeltacht’s in Ireland, boasting a vibrant young population. It remains a vital repository for one of the most distinguishing features of our culture, the Irish language.

This area has played a key role in the Irish language revival for well over a century, having attracted hundreds of thousands of Irish language learners over the years. The Summer College in Rann na Feirste is one of the largest in the county attracting 750 - 850 students annually to the townland and neighboring coastline vicinity. They colleges contribute an estimated €5million to the Donegal Gaeltacht economy, attracting students, parents and the wider family circle.

In Rann na Feirste in 2014, 719 students stayed in the townland. €103,569 was paid by Roinn na Gaeltachta and another estimated €210,000 was spent by students and parents (Source Roinn na Gaeltachta 2014). These students access the foreshore for guided walks in Irish and traditionally crossed the tidal ford at Bráid Fearsaid, at low tide, to access Carrickfinn Beach. This access will now be blocked by Site T12/419A.



*(Ref: Letter 3A – Letter of Support from the Summer College).*

St. Mary's College, Belfast, the Irish Language Teacher training college, run three different week long courses in Rann na Feirste each year and guided walks to the foreshore are regular features of these courses. Queen's University and the University of Ulster, Jordanstown, also send Irish language students to Rann na Feirste.

The story of the foreshore has always played a significant part in delivery of these courses due to its centrality to local communities as evidenced in the numerous references to the area in literature, song and oral tradition. Much has been written about this local in the Irish language, it is estimated that just under a hundred books has been published since the 1940's about this local vicinity( *Source; Oidhreacht Rann na Feirste 1, Scéalalocht, Filíocht agus Amhránaíocht: 1-2, le Pádraig Ó Baoighill(2011).*

Indeed, students from the University of New Mexico, Las Cruces, are to visit this coastal community in August 2017, to study this unique culture and landscape and a number other universities have made enquiries. We realise we have something special and Áislann Rann na Feirste and the local community know that their niche market is the language. We are passionate about the language and we will make these ventures thrive.

In the presentation we give our American guests we often quote, the great American Novel, *Moby Dick* by Hermann Melville(1851):

*It's not down on any map; true places never are.*

The knowledge we have as a community, highly contrasts the knowledge that has been put together to make determinations about these licenses. Our knowledge of our coastline has been passed on orally and by tradition from generation to generation. There is often little documentary evidence of this process, it is embodied in our culture. The Irish language describes depth and shallowness of water different to English(more like Russian); it tells us about the weather from the colour of the seaweed; it describes the

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majestic track the dorsal fin of the salmon makes when travelling up our channel; it describes how the seatrout waits for the incoming tide and what we call that first movement they make; there is a name for the imprint the flatfish make in the sand; it tells us about the weaverfish and its deadly poison from its Irish name; it tells the mythology about the Great Northern Diver and the prophetic lonely cry of the curlew. There is a story about every headland, every lagoon and current in the channel. Every stone that is a marker for depth or that summons danger in their name and navigates people around the coast.

The foreshore is central to our historical cultural narrative. This is why university students visit our area. This is why the University of New Mexico's Geography and Linguistics Departments are interested in coming to visit us. They realise that much like the native peoples of New Mexico, that can read the desert, we can read the foreshore and tell its tales. We have something here that is not found anywhere else in the world. Cultural tourism will develop further with the hugely successful *Wild Atlantic Way*. This program has attracted large numbers of tourists to the natural scenery in areas such as County Donegal. Aquaculture is a comparatively small contributor to Ireland's economy, in comparison to the more than EUR6.5 billion generated by tourism in 2014.

All our tours and guided walks have to be given at low tide so we can access the foreshore with students and adults alike. This is when the steel trestles of the oyster farms are most visible. We already encounter poor trestle husbandry, debris from ropes and fixtures, as shown in the pictures enclosed and items forwarded. Especially since we are east and north of these developments, due the prevailing winds from the west and southwest.

If these four new licenses and 9 new sites proceed this will be totally out of harmony with our cultural tourism projects.

*Feda O Donnell Coaches*, a travel company from Rann na Feirste, is the town's largest employer. They are contracted to bring 8,000 tourists from cruisers from Killybegs to



various cultural locations in the county. Áislann Rann na Feirste are in advanced discussions with the operators to offer cultural tours and shows because they believe that we have a unique product and fantastic story to tell. Walking tours along the coast are a part of the itinerary planned for these tourists.

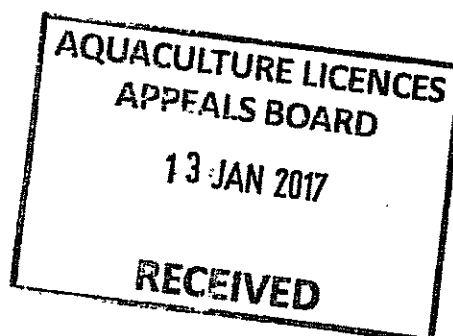
As a small village of 325 people, struggling with emigration and employment, we are on the cusp of change. We are benefitting from cultural tourism. We realise our people and our unique story and our landscape and especially our unspoilt foreshore are our greatest assets.

It may reasonably be argued, that the scale of expansion and the migration of some these new licenses to previously unspoilt foreshore will undoubtedly have a detrimental effect on or cultural tourism. If the licenses in question be allowed to go ahead, then such a situation would have profound implications on the locality's ability to sustain and to develop its existing Summer College/Third Level Education trade on which much employment and local businesses depend and that ultimately, this would irrevocably damage the areas wider tourism brand.

Accordingly, and notwithstanding the very small number of full and part-time jobs which the applicant intends to create as a direct result of their application, the resulting job losses which would arise in both the tourism and hospitality industries would subsequently negate any potential job creation which the project may yield, and would ultimately result in significant employment loss to the area.

#### **Environmental Impact:**

Considering that the nature of the activities pertaining to the application are primarily marine based, the negative influences often associated with aqua-farming on the marine environment must not be overlooked in this instance.



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The area in which this proposal is planned is a Special Area of Conservation (SAC), and any potential aquaculture or mari-culture activity must incorporate specific conditions as to accommodate Natura 2000 requirements.

It is widely documented that oyster farming can have a detrimental effect on the marine environment including through the accumulation of waste from feed and faecal pellets, while aquaculture in general may result in changes to the benthic macro-fauna. Aquaculture stock may pose a threat to wild populations through a reduction in gene pool strength caused when escaping farm stock mate with wild species, something which can result in the transmission of diseases to wild stocks. Furthermore, in areas where aquaculture activity is prolific, this is likely to result in environmental degradation and may lead to poor aquaculture growth rates. Therefore, in bays where aquaculture is abundant, the marine environment is likely to suffer from 'over stocking'.

Furthermore, the potential impact of intertidal oyster culture on water birds and the distribution of any birds which inhabit or depend on water bodies has become the subject of much study in recent years. Research carried out by the Marine Institute into the effects of oyster farming on marine and aquatic birds, has found that the assemblage variation and flocking behaviour of certain bird species is heavily affected by the presence of oyster trestles.

The study found that the species which tend to feed in large highly concentrated flocks, such as the Knot (*Calidris canutus*); Sanderling (*Calidris alba*); Dunlin (*Calidris alpina*); Blacktailed Godwit (*Limosa limosa*) and the Ringed Plover (*Charadrius hiaticula*), all demonstrated a negative response to the structures. The presence of trestles in the samples taken from the studied ordination space, directly interfered with the flocking and territorial behaviour of the species, forcing individual birds to become dispersed across several lines of trestles.<sup>1</sup>

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<sup>1</sup> Gittings, T. & O'Donoghue, P.D. (2012). *The effects of intertidal oyster culture on the spatial distribution of waterbirds*. Report prepared for the Marine Institute. Atkins, Cork.

It's notable that the species which displayed the strongest negative response to oyster trestles generally favour open mudflats/sandflats, such as those present at the proposed development site. Consequently, mixed sediment and rocky shore sites are often cited as the preferred locations for littoral zone oyster culture as such sites can minimise the potential harmful impact of oyster culture on birds inhabiting the marine environment. In this context, it can reasonably be argued that the area for which this licence is being sought would be most unsuitable for the installation of oyster trestles and harvesting equipment given the repercussions which such activities have on avifauna.

In 2014, BirdWatch Ireland and the Royal Society for the Protection of Birds (RSPB) worked to compile a updated list of bird species on the island of Ireland with each species classified into three separate headings (i.e., Red, Amber and Green), based on the conservation status of the bird and hence where conservation priority lies with respect to each.

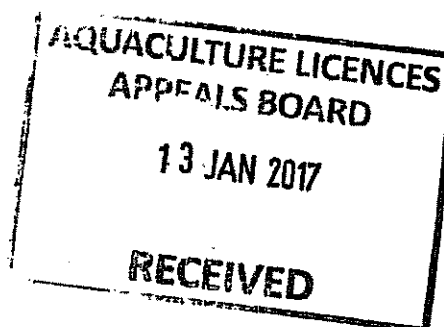
This publication, entitled 'Birds of Conservation Concern in Ireland' (BoCCI) found that, of the above named species, the Dunlin (*Calidris alpina*) qualified for Red listing due to its extreme declining breeding and wintering populations, while both the Knot (*Calidris canutus*) and the Bar-tailed Godwit (*Limosa lapponica*) were given Amber status, owing to the birds' moderate declines in range and or abundance.<sup>2</sup> In the case of the Dunlin and Knot, coastal estuarine sites of muddy sands, such as those found at the proposed development, are recognised as important wintering sites for both species.

<sup>1</sup> Gittings, T. & O'Donoghue, P.D. (2012). *The effects of intertidal oyster culture on the spatial distribution of waterbirds*. Report prepared for the Marine Institute. Atkins, Cork.

<sup>2</sup> Colhoun, K. and Cummins, S. (2014) *Birds of Conservation Concern in Ireland 2014–2019*.

We would like to request an oral hearing.

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Fee enclosed:..... €228.55

(payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 1998 (S.I. No. 449 of 1998))(See Note 2)

*Coiste Timpéallachta*  
Signed by appellant:..... *An Ghaoth* Date: *12/1/17*

**Note 1:** This notice should be completed under each heading and duly signed by the appellant and be accompanied by such documents, particulars or information relating to the appeal as the appellant considers necessary or appropriate and specifies in the Notice.

**Note 2:** The fees payable are as follows:

Appeal by licence applicant.....	€380.92
Appeal by any other individual or organisation .....	€152.37
Request for an Oral Hearing (fee payable in addition to appeal fee)	€76.18

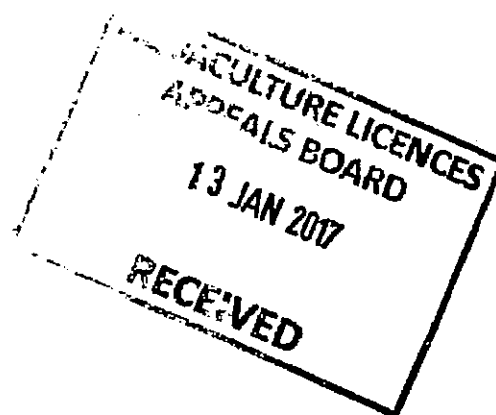
In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded. Environmental Issues

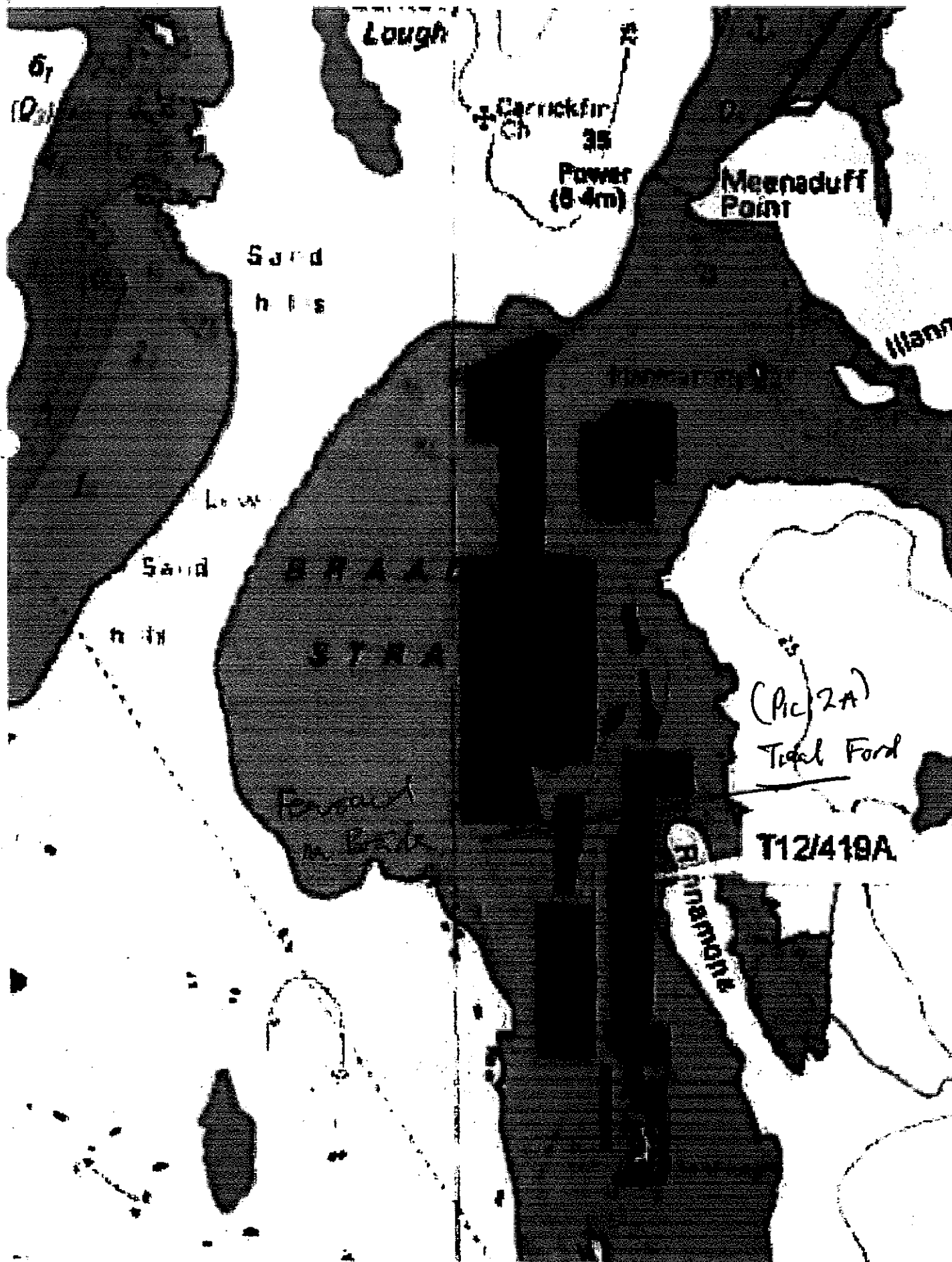


CHC I - Drafting - multi-media curriculum



(Ref Pic 1A)





# Coiste an Ghaoith

## Achainí in éadan feirmeoireacht oisrí ar 100 acra den Tráigh Bhán

1	Michael Ward	17	Michael Ward
2	Tina Boyle	18	Tina Boyle
3	Brendan Boyle	19	Brendan Boyle
4	Ainslie Devenney	20	Ainslie Devenney
5	Thomas MacIntyre	21	Thomas MacIntyre
6	K. Robb	22	K. Robb
7	S. Sean Mac Páirín	23	S. Sean Mac Páirín
8	An Ní Gallachan	24	An Ní Gallachan
9	Aislinn Collins	25	Aislinn Collins
10	Cristian ó Dochartaigh	26	Cristian ó Dochartaigh
11	Karen Ní Dhomhnaill	27	Karen Ní Dhomhnaill
12	Tony O'Searcaigh	28	Tony O'Searcaigh
13	Seana Ní Bhaill	29	Seana Ní Bhaill
14	Quinn ó Dhomhnaill	30	Quinn ó Dhomhnaill
15	Patrick ó Bhaill	31	Patrick ó Bhaill
16	Bernie Ní Bhaill	32	Bernie Ní Bhaill

AGRICULTURE LICENCES  
APPEALS BOARD  
13 JAN 2017

RECEIVED



Achainí in éadan feirmeoireacht oisrí ar 100 acra den Tráigh Bhán

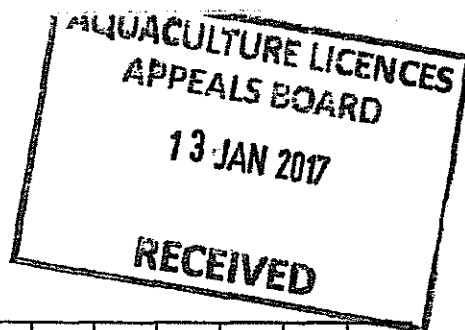
<u>1</u> Mairéad Ní Ghaoith	<u>17</u> Mairéad Ní Ghaoith
<u>2</u> Mairéad Ní Ghaoith	<u>18</u> Dolores O'Donnell
<u>3</u> Neil Walsh	<u>19</u> Brian O'Donnell
<u>4</u> Eibhlín Ní Ghaoith	<u>20</u> Paddy O'Donnell
<u>5</u> Marie Ní Ghaoith	<u>21</u> Aislin Ní Ghaoith
<u>6</u> Catherine Greene	<u>22</u> E.S. O'Donnell
<u>7</u> Emma Ní Ghaoith	<u>23</u> Paddy Mac Gaibbheigh
<u>8</u> Kelly Gallagher	<u>24</u> Nora Ní Ghaoith
<u>9</u> Ivy Ní Ghaoith	<u>25</u> Aislin Ní Ghaoith
<u>10</u> Mairéad Ní Ghaoith	<u>26</u> Orla Ní Ghaoith
<u>11</u> Mairéad Ní Ghaoith	<u>27</u> Suzanne Ní Ghaoith
<u>12</u> Donal O'Seagaird	<u>28</u> Mairéad Ní Ghaoith
<u>13</u> Donal O'Seagaird	<u>29</u> Mairéad Ní Ghaoith
<u>14</u> Mairéad Ní Ghaoith	<u>30</u> Mairéad Ní Ghaoith
<u>15</u> Mairéad Ní Ghaoith	<u>31</u> Mairéad Ní Ghaoith
<u>16</u> Mairéad Ní Ghaoith	<u>32</u> Mairéad Ní Ghaoith

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Achainí in éadan feirmeoireacht oisrí ar 100 acra den Tráigh Bhán

<u>1</u> Pádraig O'Neill ó Garanna	<u>17</u>
<u>2</u> Conall ó Garanna	<u>18</u>
<u>3</u> Síle Ó'Mallaigh	<u>19</u>
<u>4</u> Kitty Bonar	<u>20</u>
<u>5</u> Mia Smith	<u>21</u>
<u>6</u> Bríd M. Dhomhnaigh	<u>22</u>
<u>7</u> Brian Ó Duinnill	<u>23</u>
<u>8</u> Fedra Ó Dónaill	<u>24</u>
<u>9</u> Fionn W. Duggan	<u>25</u>
<u>10</u> Frunchó Zennell	<u>26</u>
<u>11</u> Cathal Mac Searnaigh	<u>27</u>
<u>12</u> Michael O'Donnell	<u>28</u>
<u>13</u> Kallie O'Donnell	<u>29</u>
<u>14</u> Wm. Greene	<u>30</u>
<u>15</u> Lorc Ó Searnaigh	<u>31</u>
<u>16</u> Seán Ó Garanna	<u>32</u>





*Coláiste Bhríde Rann na Feirste*



Rannafast,  
Annagry,  
Co. Donegal.

10<sup>th</sup>. Jan. 2017

To whom it may concern,

I write to you on behalf of the committee of Coláiste Bhríde , Rann na Feirste the Irish language summer college based in Rannafast. I wish to express our deepest reservations to the proposed large oyster farming development in the areas around Rannafast namely Rannnamona, Braad Strand and Rannafast. In spite of the fact that Coláiste Bhríde has been promoting badly needed cultural tourism to North West Donegal since 1926 no one saw fit to contact the college to ascertain our views on the proposed development .

Parents and relatives of our students visit this areas every summer to visit the students and to holiday in this area of outstanding natural beauty. It is the view of our college that the proposed large development will have a highly detrimental effect on our local shores.

The development of the Wild Atlantic Way has seen a welcome rise in the profile of the North West and it would be a shame if this progress were to be reversed by such a visually obtrusive development.

Yours Sincerely,

*Niall Ó Sluáin*

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Niall Ó Sluáin

College Secretary

