

Tully Shellfish Ltd

RE: Appeals received in relation to aquaculture license determination T12/510

Dear Sir/Madam,

In response to the appeals received as a result of the public consultation following license determination, Tully Shellfish have the following comments and observations.

General Comments:

Tully shellfish have been operating in Donegal for 19 years. We currently employ four people on a fulltime basis with seasonal work for an additional two people. We regard this application as being an important part of the sustainable development not only of our business but that of the local community. We have an expectation that the addition of this site will necessitate the creation of at least one additional full-time position in the short term and additional part time positions as the site reaches full capacity. We are proud of the contribution we make to the economy in what are rural coastal locations with limited year-round employment opportunities. All Directors and employees live in Donegal and have no desire to negatively impact the economy and/or amenity value of Ballyness Bay.

Submissions: Falcarraah Tourists and Traders Association

Response: We have structured our response our response to answer specific issues raised in this submission.

Location of the site/perceived visual impacts

The location of site T12/510 was chosen so that it could not be viewed from any of the designated viewpoints in the County Donegal Development plan 2018-2024 (See Fig 1 below). Furthermore, the site is not overlooked by any designated scenic routes or any dwelling or commercial premises. We foresee no conflicts with eco-tourism in the bay (See Tourism section below) and we wish to state that we are committed to the highest standards of navigational safety within the Bay and will defer to the directions of the Commissioners of Irish Lights for the installation and character of all navigational marks.

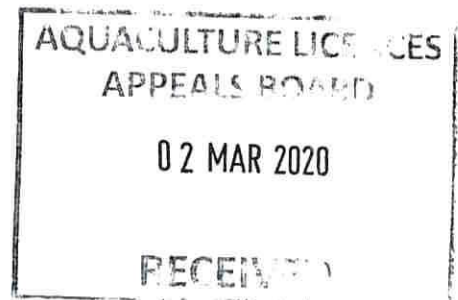
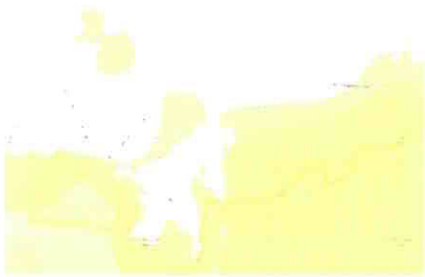
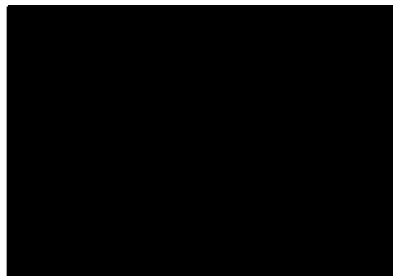


Figure 1: Views defined as important within the County Donegal Development plan 2018-2024



Perceived conflict with tourism/ economic impact

The perceived conflict between sustainable aquaculture and tourism, particularly along the Wild Atlantic Way is outdated. In support of this assertion we wish to highlight a statement by Sinead Hennessy, Food Tourism Officer with Failte Ireland at the launch of 2018 information workshops for the seafood businesses', including aquaculture producers, that enhance visitor offerings aligned to the Wild Atlantic Way. She said;

“More and more visitors want to experience local culture through authentic food and beverage-based activities, and what better way for visitors travelling the Wild Atlantic Way to do this than to meet and engage with the maker’s whose lives have been shaped by the Sea. Taste the Atlantic, encourages those who travel along the route to slow down, dwell longer and immerse themselves in the local seafood traditions and practices of the West coast, all while fostering a deeper appreciation for our exceptional seafood, clean Atlantic waters and growing food reputation. Today’s development programme is all about delivering on the promise of the Wild Atlantic Way by creating and offering an enhanced and saleable experience to leisure tourists and is delivered as part of Failte Irelands commitment to increasing seasonality and regionality for the tourism industry.”

The successful “Taste the Atlantic” allows tourists exploring the Wild Atlantic Way to taste and learn about local seafood to enhance their experience. It’s about lobster and crab, salmon and mackerel, oysters and mussels plucked fresh from the ocean. But it’s also about the men and women who mix tradition and 21st-century techniques to bring it from tide to table, to serve it just a few miles (or in some cases, just a few feet) from where it’s caught. This initiative has been so successful that it is now being replicated in other areas of the country e.g. Sea Louth scenic seafood trail.

The County Donegal Development plan 2018-2024 classes the environs of Ballyness Bay as an area that exhibits characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. Sustainable aquaculture developments such as those proposed by our company will support the creation of local jobs and support Failte Irelands commitment to increasing seasonality and regionality for the tourism industry.



Figure 2: Rural Area Types County Donegal Development plan 2018-2024

Tel: [REDACTED]
Email: [REDACTED]

Adequacy of the Appropriate Assessment

The Marine Institute as scientific advisors to the Minister, are the competent authority with regard to Appropriate Assessment of aquaculture in a given area. Thus, issues raised by Falcarragh Tourists and Traders Association in connection with the appropriate assessment should more properly be referred to them.

Issues relating to consultation and procedural matters

Matters relating to the public consultation or other procedural elements of the aquaculture licensing process are managed and controlled by the Aquaculture and Foreshore Management Division (AFMD) of the Department of Agriculture, Food and the Marine (DAFM). This, it would not be appropriate for us to comment on these matters and queries in this regard should be referred directly to the AFMD of the DAFM.

Submissions: Save Ballyness Bay S.A.C. Action Group

Response: We have structured our response our response to answer specific issues raised in the submission.

Perceived conflict with tourism/economic impact

See response to this issue in response to the Falcarragh Tourists and Traders Association

Perceived conflict with other marine users/Accommodation for access and recreation

We foresee no conflicts with other marine users in the bay and we wish to state that we are committed to the highest standards of navigational safety within the Bay and will defer to the directions of the Commissioners of Irish Lights for the installation and character of all navigational marks.

Perceived impact on the Environment

Shellfish aquaculture is an extensive form of food production in that no inputs of food or other substances are required. The Marine Institute considered all possible impacts of our proposal on the environment of Ballyness Bay and found no threat to the environment.

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Perceived conflict with Bealach Baile an Easa

T12/510 will not impede access to this walking route. Indeed, the structures will only be visible at low water and the site will be marked in line with the directions of the Commissioners of Irish Lights who are the competent authority for the installation of navigational marks.

Adequacy of the Appropriate Assessment/ threat to protected species.

See above

Site safety/hazards

The Department of Agriculture Food and Marine have monitoring and inspection procedures to ensure compliance with license terms and conditions which include all elements of waste disposal and site management. The status of SAC's and SPA's are routinely monitored by the National Parks and Wildlife Service. We further note that many clean coasts groups collaborate with the local aquaculture industry when organizing beach cleans, with BIM the seafood development agency providing grant aid and other supports for local clean-ups. We would hope that such a partnership would be possible in Ballyness Bay.

Location of the site/perceived visual impacts

See above

Perceived conflict with other marine users/Accommodation for access and recreation

See above

Accusations of being untruthful

We acknowledge that we made an error when answering yes to the query relating to the site being located within a designated shellfish area. Designation will only be possible once shellfish have been produced in the area for several years. Such designation will support the efforts of locals to achieve funding for an upgrade of the Falcarragh sewage treatment works.

We regard this site as sufficiently distant from the sewage outfall and note that we have a responsibility to ensure that any product we are placing on the market is fit for human consumption. We note that the SFPA, FSA or Irish waters as key stakeholders for sewage treatment and shellfish hygiene have not objected to this license.

Wrack Rights

T12/510 is located on a sandy substrate in an area free of rocks and seaweed. We fail to see how with would impact with local traditions.

Association with the locality

As a citizen of the state and with a company registered in this state, we have a protected right to apply for a license for a legitimate use of the state foreshore. We reject the assertion that we have no association with the locality. Ballyness and its environs is an area which we have visited often and where we have family connections.

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Heritage

We note that the National Monuments Service did not make any comments, observations or objections in relation to this application. However, we have independently consulted the Department of Culture, Heritage and the Gaeltacht's Historic Environment Viewer¹ and Wreck Viewer² and we note that there are no known Heritage features in or directly adjacent to the proposed site. A midden is noted on the other side of the pier, but our operations will not impact on this area.

We also note that access methods and culture equipment proposed pose no risk to any buried and previously unrecorded features.

Please contact me if you have any queries.

Yours faithfully,



Michael Havlin, Director

Tully Shellfish

¹ <http://wchps.archaeology.ie/historicenvironment/>

² [https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=80e50518e5f4437bba6\(284ff30fd640\)](https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=80e50518e5f4437bba6(284ff30fd640))

