

***N & A Scallan  
Mussel Suppliers  
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Republic of Ireland***

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**RE: Mussel Sites Wexford Harbour T03/48A & T03/91A.**

**REF: AP36-37/2019 (S46 01.2024).**

To whom it may concern,

I wish to reiterate to you how detrimental the Minister's decision to reduce the above Mussel Sites in Wexford Harbour will be to our business.

If the proposed reduction on our sites goes ahead, it will make our business completely unviable.

All of our sites lie within the estuarine environment and were all cut by 66% in the proposed DAFM licences. This means that we are the **only producer** in the whole harbour subjected to having all of our sites reduced by this huge percentage and as such are **disproportionately negatively impacted**. This is unjust.

There was no consultation had with any of the operators in Wexford Harbour when it came to these proposed reduced areas. So not only would these cuts make our business unviable, in every day terms they would make our areas of cultivating grounds unworkable. The layout makes it impossible for vessel operations, underwater hazards make it impossible to plant mussel seed in parts of these areas, and also the capacity of tonnage that these areas could hold for ongoing cultivation would as I have already stated make this business completely unviable.

Our site T03/91A is located near one of the busiest parts of Wexford Town, with Wexford bridge, the main traffic carrier into Wexford adjacent to the site. Also Wexford railway station is located nearby, as well as many shops and busy businesses along the shoreline, so I think it can be agreed that disruption in the area is certainly not an issue.

If these proposed drastic cuts to our sites are going to go ahead we would ask that we be given a chance to realign the reduced areas within our existing application so as to maximise the amount of usable ground. In such a scenario this would not increase the area that DAFM proposed to give and would not have any added impacts on the SAC and as for reasons stated above would not have any impacts on birds in this busy part of the harbour.

We would like to request an Oral Hearing for the following reasons:

- The negative impact that loss of mussel licences would have to our family and many families and businesses in the Wexford area which has been long standing within the area
- The negative impact that removal of licences would have given the known positive ecosystem effect of mussels in the harbour have ;counteracting the increasing

nitrogen and phosphorus nutrient loadings into the bay (from farming and human activities) by feeding on phytoplankton. Removal of mussel farming would in effect literally give the green light to eutrophication of the harbour with associated drastic environmental consequences (Lough Neagh an example currently) such as benthic kills due to anoxia, disruption to the food chain affecting fish and birds alike. The precautionary principle should be applied against the removal of the mussel industry as the negative environmental consequences to both the SAC and the SPA's is a distinct possibility through the removal of the huge top down control mussels have on the development of eutrophication.

Kind Regards,

Martin Scallan.

On Behalf of Scallan Mussels,  
29 William Street  
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Co Wexford