Memorandum

Date:	25/02/2022
Subject:	Non-Technical Review of Kenmare Bay Licence Applications: T06/202 Deenish
Written by:	[redacted] Benthos Ecology Unit, MI
Checked by:	[redacted] Benthos Ecology Unit, MI
Approved by:	[redacted] Licensing and Policy, MI

Background

1. The Department of Agriculture Food and the Marine (DAFM) requested a preliminary non-technical review of the finfish aquaculture licence application T06/202 in Deenish, Kenmare Bay, Co. Kerry. This memorandum details the findings of the requested review of the information provided in the application documents (including the EIAR). The findings of this review relate to issues or ambiguities within the application documents that affect the reader's ability to fully understand the proposal from a non-technical perspective.

Review of Applications

Documents Reviewed

T06/202 Deenish

2. The T06/202 application documents provided to the MI by DAFM which have been reviewed are:
    a. Application Form;
    b. Additional documents (Schematics and charts of proposed sites [10 pages]):
        i. T06-202 GIS co-ordinates;
        ii. H1902 Mowi Ireland, Deenish, Sheet10 – Overall site layout;
        iii. H1902 Mowi Ireland, Deenish, Sheet 11- Site Sections;
        iv. H1902 Mowi Ireland, Deenish, Sheet 12- Site Sections;
        v. H1902 Mowi Ireland, Deenish, Sheet 13- Plan layout;
        vi. H1902 Mowi Ireland, Deenish, Sheet 14- Component details;
        vii. H1902 Mowi Ireland, Deenish, Sheet 15- OSI Site location map;
        viii. H1902 Mowi Ireland, Deenish, Sheet 16- OSI Site location map;
        ix. H1902 Mowi Ireland, Deenish, Sheet 17- Site Access map;
        x. H1902 Mowi Ireland, Ballinskelligs Bay, Sheet 18 – British Admiralty Chart;
    c. JN1524 Deenish EIA – Volume 2- Main Report – 14.12.2020;
    d. JN1524 Deenish EIA – Volume 3 – Appendices – 14.12.2020

Application documents provided to the MI by DAFM which have not been reviewed in this memo:

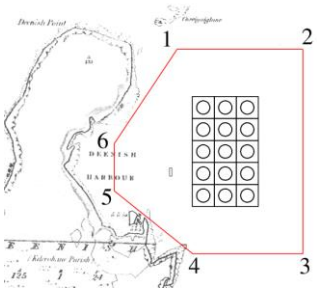
a. JN1524 Deenish EIA – Volume 1- Non Tech Summary – 14.12.2020
b. JN1524 Deenish NIS Volume 1 – Main Report – 14.12.2020
c. JN1524 Deenish NIS Volume 2 – Appendices – 14.12.2020

Findings of Preliminary Non-Technical Review

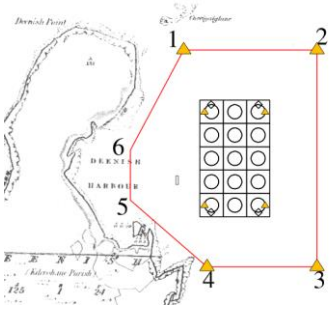
Administrative – T06/202

3. There appear to be inconsistencies in the nomenclature for the Deenish site number. The EIAR and all but the GIS coordinates additional document refer to the Deenish site number as T06/202.The GIS coordinates document refers to the Deenish site number as T06/202A.
4. Section ix of the application form (Number, type and shape, cubic capacity, depth of cages/tanks):
    a. In the application form, the diameter of the cage is 40.1m and circumference of 126m while the EIAR states that the cage diameter is 40m and circumference of 100m. A 100m circumference would be impossible with a diameter of 40m.
    b. The application form and additional sheets 11 and 12 (site sections) state that the wall depth will be 11m for a total depth of the pen to be 20m. In the EIAR, the pen wall depth will be 8m with a total depth of 10m.
    c. There is a discrepancy in the cubic capacity between the application form and the EIAR. In the application for the total capacity is presented as 265,577 m^3 (17,705.15m^3 per pen) whereas in the EIAR the cubic capacity is 41,422 m^3 (6,904 m^3 per pen).
5. Section x of the application form (Sea Cage characteristics (mesh size net type)):
    a. There is a discrepancy in the net mesh size in the application form of 32mm, whereas the EIAR states the mesh size is 15mm for smolt nets and 22-25mm for grower nets.
6. Additional documents Sheet 15 (site location map) and Sheet 16 (site location map with navigation lights) have slightly differing boundary locations. Sheet 15 more closely resembles the additional document GIS coordinates sheet. The boundaries are marked in red below.

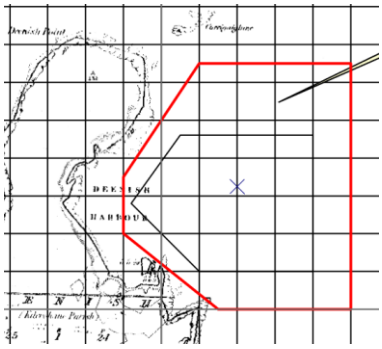
a. Sheet 15 (site location)



b. Sheet 16 (site location with navigation lights)



c. GIS coordinates



7. The hydrographic study was undertaken in 2010 which significantly predates the date of submission of this application. This model should be updated with more recent data, this is likely to be raised at the technical review stage.
8. EIAR (p 31)- Figure 2-16 and Appendix 5 MOWI standard operating procedures IV Single Bay Management Plans (p201) indicate that the proposed stocking and fallowing plan begins in January year 1 and ends in September year 2. This is contradictory to the EIAR document p26 which states that the end of the harvest period is December year 2 with a 3-month fallowing until the next generation is stocked the following March. The 24-month March-March cycle is also displayed in Table 2.2- Production cycle for T6/202 (p27), Figure 2-13: Mean weight growth for one production cycle (p28), Figure 2-14: Total stock and harvest biomass for three production cycles (p29), and Figure 2-15: Mean biomass gain, feed fed tonnes and feed conversion ratio (FCR) for one production cycle (p30).
9. EIAR p174- Table 6.18 Potential impacts on bird populations
    a. Of the cells in the column “Impact Significance”, seven include “SIGIIICANT” instead of “SIGNIFICANT”

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