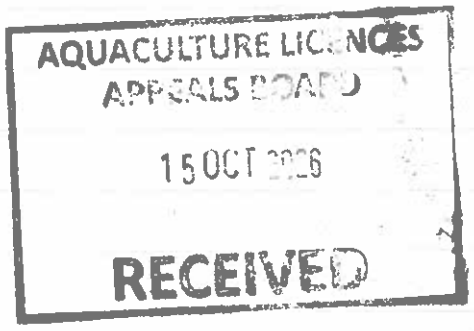


Brian Farrell
[redacted]

13 oct 2026

To: Mr. Karl Brogan,
Secretary of ALAB
Kilminchy Court
Dublin Rd
Portlaoise
Co — Laois
R32 OTW5.

Mr Brogan,

In observation of the Boards public Notification for Submissions for / re Aquaculture licences in Ballyness Bay / Brian Farrell of the above address am 100% percent opposed to Aquaculture Harvesting in Ballyness Bay. An S.A.C & S.P.A having studied the revised N.I.S from Aquafact May 2026 its my opinion that significant uncertainties remain.

MITIGATION MEASURES THAT ARE NO MANDATORY.
LIKE "STRONGLY ADVISED" & "BEST PRACTICE" OF WHICH PROVIDES NO CERTAINTY.
MEASURE SHOULD PROTECT & AVOID ADVERSE EFFECTS ON PROTECTING THE ALREADY ESTABLISHED ECOSYSTEM THIS IN TURN RAISES UNCERTAINTIES RELATING TO ACCESS ROUTES, PROTECTION of FIXED DUNE HABITAT & THE UNPRACTICALITY OF A 200M SEAL BUFFER.

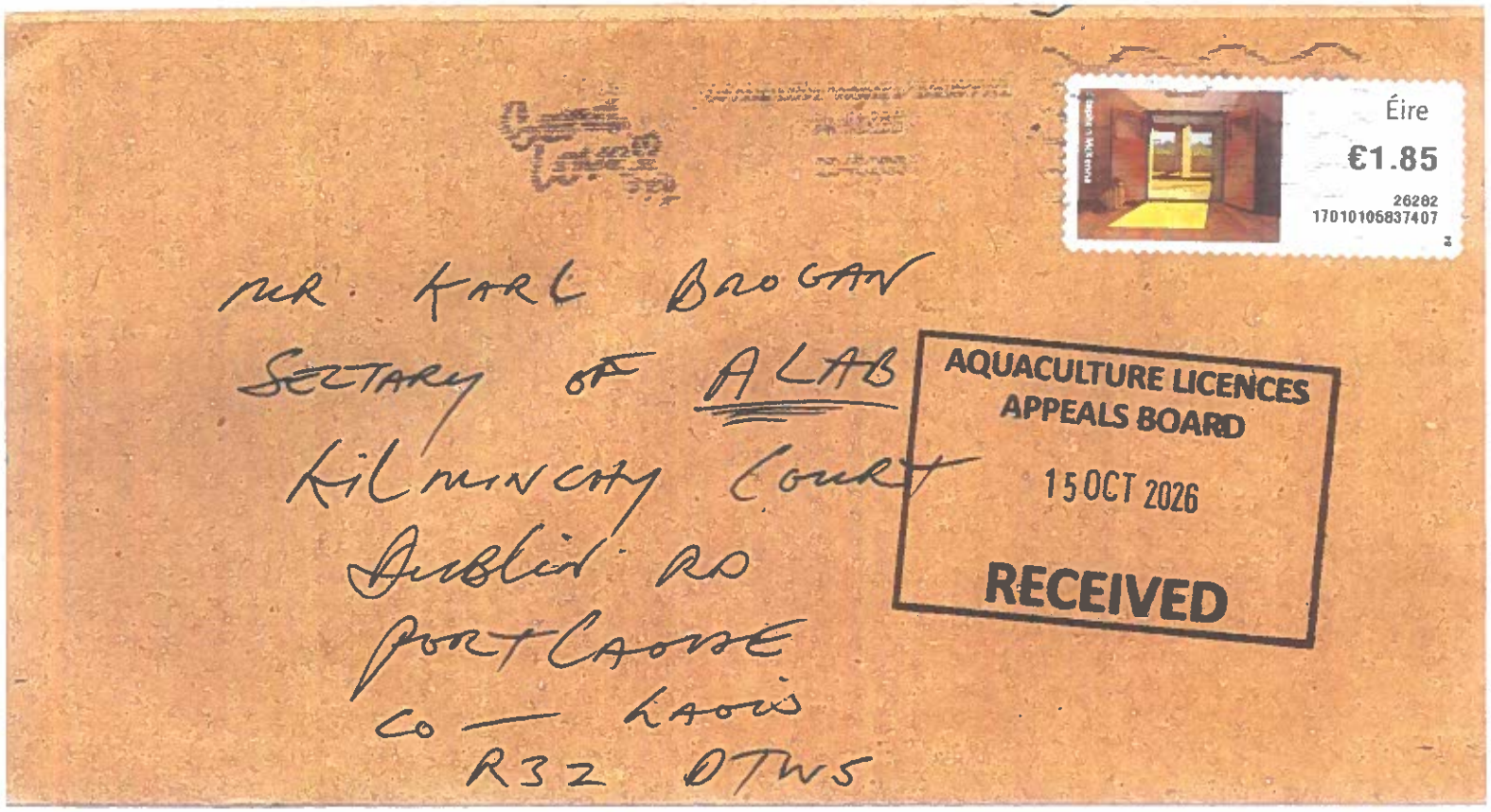
QUESTIONS ARE STILL & WILL REMAIN REGARDING BALLYNESS BAY AS A CONTINUAL SHIFTING BAY.
THE BAY IS DEEMED AS SITE USE BY MOBILE SPECIES ASSOCIATED WITH OTHER SITES.
SEALS, OTTER, RED-THROATED DIVER - ATLANTIC SALMON, SEA TROUT & IN TURN THE PEARL MUSSEL.
THERE ARE NO MAPS TO SHOW THE PROPOSED ROUTES.
[redacted]
THE PACIFIC OYSTER HAS BEEN PROVEN TO REPRODUCE. RATHMULLAN IS PROOF OF THAT.
MEASURES ESSENTIAL TO AN APPROPRIATE ASSESSMENT CONCLUSION MUST BE SPECIFIC, EFFECTIVE

& ENFORCEABLE. SO AGAIN AN ACCESS ROUTE FROM THE SOUTH CAN'T BE TREATED AS ESSENTIAL FOR HABITAT AVOIDANCE AND NEARLY A MATTER RECOMMENDED BEST PRACTICE. & A 200M BUFFER ZONE CAN NOT BE RELIED UPON.

ARTICLE 6(3). HABITATS DIRECTIVE DEMANDS PRECAUTIONARY STANDARD. THERE MUST BE PRECISE, COMPLETE & DEFINATE SCIENTIFIC FINDINGS THAT THE PROPOSED DEVELOPMENT WILL NO AFFECT THE INTEGRITY OF THE EUROPEAN SITES WITH / NO REASONABLE SCIENTIFIC DOUBT

I DONT BELIEVE THERE IS SUFFICIENT SCIENTIFIC EVIDENCE TO SUPPORT THE N.I.S. THERE ARE TO MANY UNCERTAINTIES

NO REASONABLE SCIENTIFIC DOUBT


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MR. KARL BOGAN
SECTARY OF ALAB
KILMINCHY COURT
DUBLIN RD
PORTLAOISE
CO — LAOIS
R32 DTW5
AQUACULTURE LICENCES
APPEALS BOARD
15 OCT 2026
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