Friday 30th October 2026

Aquaculture Licences Appeals Board

Kilminchy Court

Dublin Road

Portlaoise

Co. Loais

R32 DTW5

Re: Ballyness Bay, Co. Donegal

To whom it may concern,

Please see below comments from Inland Fisheries Ireland re the proposed aquaculture sites in Ballyness Co. Donegal.

Ballyness Bay is situated in north west of Donegal, the towns of Falcarragh and Gortahork are adjacent to the bay. Ballyness Bay is a large shallow bay and at low tide exposes a large area of sandflats. This site is of European importance and designated as a Special Area of Conservation (SAC) because of the habitats and species listed on Annes I and Annex II of the EU Habitats Directive. The Qualifying Interests (QI) of the site (Site Code 001090) are as follows:

- Mudflats and sandflats not covered by seawater at low tide [1140]
- Embryonic shifting dunes [2110]
- Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]
- Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]
- Humid dune slacks [2190]
- Vertigo geyeri (Geyers Whorl Snail) [1013]

Two river systems flow into Ballyness bay:- the Glenna River flows into the southern section of Ballyness Bay and the Tullaghobegley River flows into the eastern section of the bay. Both rivers systems have runs of salmon and seatrout which generally occur during June to September. The most prolific of the two river systems is the Tullaghobegley River which offers good angling to local and visiting anglers alike. The source of the Tullaghobegley is Lough Altan at the base

of Mount Errigal and it flows for approximately 9km before entering Ballyness Bay. The source of the Glenna River is also at the foot of Mount Errigal but the river flows northward through the scenic Gaeltacht area before entering Ballyness Bay at Gortahork.

Following a review of the site Inland Fisheries Ireland would to note the following:-

Should this application to cultivate Gigas Oysters using bags and trestles and the cultivation of Clams using wooden trays under mesh be approved the three proposed sites on the eastern shore of Ballyness Bay would need to be located in order to avoid the narrow channel at low tide which salmon and sea trout use for their migration upstream into the Tullaghobegley and Glenna Rivers.

As Ballyness Bay has little marine traffic, generally only recreational craft, the proposed sites would have little impact on marine traffic, however sites should be clearly identified by a St. Andrews Cross.

Ballyness Bay is situated just off the busy N56 road and the bay is very visible. The visual impact of bags and trestles for the cultivation of Pacific oysters and the use of wooden trays under mesh for the cultivation of Clams may impact the visual aesthetics of Ballyness Bay.

Proper biosecurity protocols should be followed during operations to ensure no diseases or non-native species are introduced or spread from the aquaculture sites or activities.

The applicant should confirm that only triploid oysters are intended for use on site.

It should also be noted that a commercial salmon draft net fishery still remains in existence at the base of the Tullaghobegley River, which drains to Ballyness Bay. The draft net fishery hasn't operated in recent years due to conservation reasons, but may open again in the future depending on the annual available harvestable surplus.

Yours sincerely

Owen Kelly

Owen Kelly – District Inspector, Inland Fisheries Ireland

[redacted]