Alab, Info

From: Alab, Info
Sent: Monday 2 November 2026 11:07
To: 'Mark Flynn'; Ray Gaughan
Subject: RE: Formal Objection to Aquaculture Licences – Ballyness Bay Co Donegal Ireland

Dear Sirs

We acknowledge receipt of your submission/observation to the Aquaculture Licences Appeals Board which was received on 30 October 2026.

Your submission/observation will be brought to the Board's attention.

Regards

Karl Brogan
Secretary to ALAB

From: Mark Flynn [redacted]
Sent: Friday 30 October 2026 17:46
To: Ray Gaughan [redacted]
Cc: Alab, Info <Info@alab.ie>
Subject: Re: Formal Objection to Aquaculture Licences – Ballyness Bay Co Donegal Ireland

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

That's really good

Sent from my iPhone

> On 30 Oct 2026, at 16:28, Ray Gaughan [redacted]
>
> Dear Department of Agriculture, Food and the Marine (DAFM) and the Aquaculture Licences Appeals Board (ALAB)
>
> **Formal Objection to Aquaculture Licences – Ballyness Bay**
>
> I strongly object to the apparent disregard shown by the Department of Agriculture, Food and the Marine (DAFM) and the Aquaculture Licences Appeals Board (ALAB)

towards the views of the overwhelming majority of the local community, who remain firmly opposed to commercial shellfish farming in Ballyness Bay.

Throughout the licensing and appeals process, there has been a concerning perception that greater consideration has been given to the interests of licence applicants than to the legitimate concerns of local residents.

Ballyness Bay is not simply an area of outstanding natural beauty; it is also a designated Special Area of Conservation (SAC), recognised for its ecological importance and sensitive natural habitats. This designation brings specific legal obligations under the EU Habitats Directive, requiring the protection of the site's conservation interests. The authorities must demonstrate, through rigorous and scientifically robust assessment, that the proposed aquaculture activities will not adversely affect the integrity of this protected site, either individually or in combination with other developments. Where reasonable scientific doubt remains, the protection of the bay's ecological integrity must take precedence over commercial interests.

I am particularly disappointed by ALAB's apparent failure to give sufficient weight to the serious environmental concerns raised regarding the bay, including the potential impact on its sensitive habitats, biodiversity and protected wildlife. The obligations arising under relevant EU environmental legislation must be fully respected. It is essential that all identified gaps in environmental assessments are satisfactorily addressed before any licensing decisions are finalised.

Of particular concern is the proposed introduction and cultivation of non-native species, including Pacific oysters and certain clam species. The potential for these species to reproduce naturally, spread and colonise surrounding areas presents an environmental risk that should not be underestimated or dismissed. Any resulting ecological changes could prove extremely difficult to reverse.

Ballyness Bay is characterised by its outstanding natural beauty, unspoilt coastal landscape, expansive views, rich wildlife and remarkable tranquillity. Its natural setting is increasingly rare and represents an irreplaceable environmental and landscape asset. The introduction of extensive commercial aquaculture infrastructure would fundamentally alter the visual character of the bay, undermining the very qualities that make it so special. Once this landscape is industrialised, its original character may never be fully restored.

The bay is also a highly valued natural amenity, enjoyed by residents and visitors alike for walking, swimming, boating, angling, windsurfing and other recreational activities. Commercial shellfish farming risks introducing additional litter, noise, pollution and operational disturbance, including activity during evenings and at night, fundamentally changing the peaceful character of the area.

Ballyness Bay is an increasingly popular destination along the Wild Atlantic Way, contributing valuable tourism income to the local economy. Extensive arrays of oyster trestles would create a significant visual intrusion into this exceptional landscape, potentially discouraging visitors and diminishing the enjoyment of the area for both residents and tourists. The economic value of preserving the bay's natural beauty and tourism appeal should not be overlooked in favour of private commercial interests.

Experiences reported from other coastal locations where commercial shellfish farming has been introduced raise legitimate concerns about potential environmental deterioration. Ballyness Bay should not be exposed to similar risks without a thorough and transparent assessment of the long-term consequences.

I am also concerned that insufficient consideration may have been given to the cumulative impact of the proposed aquaculture developments. Individual applications should not simply be assessed in isolation, but considered collectively in terms of their effects on the bay's ecology, wildlife, water quality, landscape and existing recreational activities. Once commercial aquaculture becomes established, the consequences for the natural environment may be difficult, if not impossible, to reverse.

There is also a fundamental question of public interest. Ballyness Bay is a shared natural resource whose environmental, recreational and economic value extends far beyond the interests of individual commercial operators. The anticipated economic and employment benefits of the proposed licences should be clearly demonstrated and properly weighed against the potential long-term consequences for the wider community. Consideration should also be given to whether less environmentally sensitive locations could accommodate such activities.

Furthermore, I believe DAFM and ALAB should clearly demonstrate how the substantial objections raised by the local community have been considered, how the environmental risks have been assessed and on what grounds the granting of licences can be justified in light of these concerns. The decision-making process must be transparent, balanced and supported by robust environmental evidence. There must also be clear accountability for environmental monitoring, enforcement and restoration should damage occur.

This is an issue of considerable importance to the local community, both now and for future generations. The protection of Ballyness Bay's outstanding natural beauty, SAC designation, wildlife, recreational value and tourism appeal must not be compromised for short-term commercial gain.

For all these reasons, I strongly object to the granting of aquaculture licences in Ballyness Bay. I urge DAFM and ALAB to give proper weight to the concerns of the local community, fully discharge their environmental obligations and prioritise the long-term protection of this unique and irreplaceable coastal environment.

Regards

Ray Gaughan BSc(Hons) MRICS