Alab, Info

From: robert wasson [redacted]
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In the Cloughaneely Parish area a campaign began rapidly in the Summer of 2019.

We object to the total disregard shown by the Department of Agriculture, Food and the Marine (DAFM) and the Aquaculture Licences Appeals Board (ALAB) to the strong opinions of the vast majority of the local Community in their total opposition to shellfish farming in Ballyness Bay. Rather, there seems to have been noticeable bias by those two organisations in favour of the oyster licence applicants all during the licensing and appeals process.

Licence applications were "publicised" in a newspaper (The Donegal Democrat) which is scarcely read in the Cloughaneely area and is much more popular in South Donegal. When awareness of the applications did begin to filter through to the local Community, outrage was very clearly and swiftly indicated by the numbers contributing to online expressions of concern and opposition, a **very** large public local meeting, poster campaign, broadcasts, articles, contacts with public representatives, etc. The many expressions of opposition to the granting of licences have been maintained by, literally thousands, over seven years!! Resisting the imposition of unwanted shellfish farming has been very costly, stressfull, unjust, and should have been avoidable had effective consultation been promoted from the outset with genuine engagement and active listening to the views of the local Community. Community members with a clear interest in the issue donated thousands of Euros and signed in their hundreds to express their concerns yet , even now, there seem to be impediments placed in the way of inclusive participation.

One unintended consequence of the long delay has been to demonstrate clearly the shifting nature of the dune and Bay environment which is a significant feature contributing to the long term unsuitability of establishing fixed designated sites to carry out shellfish farming at Ballyness.

We object to ALAB's disregard of the well founded concerns that have been expressed for the vulnerable, and hence, valuable natural environment in the bay, coupled with their ignoring of the most basic of the EU Directives to protect its rare and endangered wildlife, rare mammals, fish, an

unusually rich variety of bird life, and other rare flora, fauna, funga, etc. Not alone is the Bay exceptional in the locations of SAC and SPA, there is also a salmon Sanctuary at the head of the Bay on the Tullaghobegley River and a number of restorative projects on the catchments of the Glenna and Tullaghobegley Rivers involving freshwater pearl mussel sites and riparian-adjacent native woodland regeneration. It is hoped that measures such as these may provide some hope for the revival of the heritage of a once-thriving salmon and sea trout fishery in Ballyness Bay. An additional benefit could include the preservation of the eelgrass beds previously recorded in the Bay. A further consideration is the merit in providing the additional special protection accorded to a lagoon environment if Ballyness fits, as it would appear to, the definition of a coastal lagoon as defined by the Habitats Directive: it is an expanse of *"shallow coastal salt water, of varying salinity and water volume, wholly or partially separated from the sea by sand banks or shingle"*.

A particularly dangerous threat is the proposed introduction of non-native species of Clams and Pacific Oysters into the Bay and the denial of the well documented possibility of these to revert to spawning and colonise the surrounding area stimulated by rising water temperatures.

Ballyness Bay is a much cherished amenity in the Community. It provides a health-giving location for walking, swimming, boating, sea and game angling, art, photography, bird watching, windsurfing, kite surfing, kayaking, paddle boarding, surfing, body boarding, Citizen Science activities, etc, to the Community and to visitors alike. Industrial scale shellfish farming would add extensive pollution, litter, noise and daily and night time disturbance on the Bay, on access roads, and potentially on newly created access and egress. The disastrous effects on the rich variety of common, and of threatened, rare species cannot be ignored as it would seem to fit various definitions of wildlife crime.

"Both compaction and decompaction by various human activities such as trampling (O'Carroll et al., 2016) or exploitation of benthic species with mechanical means have a great effect on habitat and soft substrate habitat-forming species (Aspden et al., 2004;Badino et al., 2004;Wiesebron et al., 2021). Human access and activity on substrate characteristics in areas of bivalve cultivation or extraction is of particular conservation importance because many of these areas are in coastal zones of special protection for their environmental interest (Forde et al., 2015). There are many studies about the implications of compaction for the health of benthic communities (Hsu et (Badino et al., 2004;Diaz et al., 1994;Kelaher et al., 2003)"

Ballyness Bay is an increasingly popular beauty spot along the Wild Atlantic Way. That translates into tourism income that is a crucially important addition to the limited local economy. Arrays of oyster trestles would be an unacceptable visual blot on the Bay as well as reducing its appeal to visitors and locals alike.

Wide experience from other areas all point to a marked deterioration in the local environment once commercial shellfish farming is introduced. We don't want Ballyness Bay to follow the same pattern.

This is a hugely important issue for our community.

For all these reasons outlined and many more, we strongly object to the granting of aquaculture licences in Ballyness Bay.

In conclusion, should there still be any doubt about the visual and environmental harm done by trestles, a simple test is to go now to Ballyness Bay and walk out the Dooey commonage to see on site, (5V24+F96 Google maps) where over a period of at least 18 months, rusting decaying and hazardous trestles remain in an area on the Ballyness Machair. Please see images attached.

GRMA

Robert Wasson



