AQUACULTURE LICENCES
APPEALS BOARD
21 OCT 2026
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The Secretary
Aquaculture Licences Appeals Board
Kilminchy Court
Dublin Road
Portlaoise
Co. Laois
R32 DTW5

Subject: Formal Objection to the Proposed Aquaculture Licence for Non-Native Pacific Oysters

1. Protection of an Area of Exceptional Ecological Value

I wish to formally object to the proposed aquaculture licence for non-native Pacific oysters within this Special Area of Conservation (SAC).

This is an area of exceptional natural beauty and enormous ecological value. It supports an abundance of wildlife, including seals, birds, native oysters, mussels, crabs, periwinkles and countless smaller species living within its rock pools, sand and seabed. This rich and diverse ecosystem is precisely the kind of environment that the SAC designation is intended to protect.

2. Threat to Native Species, Habitats and Wildlife

The commercial cultivation of non-native Pacific oysters will disrupt the natural balance of this established ecosystem. Pacific oysters can compete with native oysters and mussels for space and resources, while dense oyster beds and accumulated shells can alter the structure of the seabed, covering natural sand and mud.

These changes can affect sediment oxygen levels, burrowing organisms, rockpool life and the wider marine food chain. The resulting impacts extend beyond the oysters themselves, potentially affecting the feeding grounds and food sources upon which birds, seals and other wildlife depend.

The seabed is not empty space available for commercial use; it is a living habitat supporting countless species. Introducing a non-native species and fundamentally changing these habitats within a protected area threatens the biodiversity that makes this location so valuable. Once established, such ecological changes may be impossible to reverse fully.

3. Triploid Oysters and the Risk of Reproduction

Triploid oysters are intended to be sterile, but triploidy is not an absolute guarantee against reproduction. Evidence has shown that some triploid Pacific oysters can retain reproductive capability.

Even a small proportion of reproductively capable oysters presents a serious concern in an open marine environment. A single spawning oyster can release millions of eggs and sperm, potentially resulting in large numbers of larvae dispersing into surrounding waters.

Relying on triploidy alone is therefore insufficient protection against the establishment and spread of a non-native species. The application must address how reproductive capability will be detected, how stock will be monitored and what effective measures will be taken if wild Pacific oysters become established beyond the farm.

4. Visual Impact and Public Safety

The proposed metal racks and associated aquaculture equipment would be a significant visual intrusion into this beautiful and otherwise natural coastline. They would fundamentally change its appearance and diminish its natural beauty and amenity value.

The structures may also create hazards for wildlife and for people walking or exploring the shoreline, particularly when equipment is submerged, obscured by the tide or covered in marine growth.

5. The Responsibility to Protect the SAC

An area designated for its ecological importance should receive the protection its status demands. Its designation must mean more than recognising its environmental value while allowing commercial activities that threaten its native species and natural habitats.

The commercial benefits of aquaculture cannot justify compromising the ecological integrity of this protected area. Its conservation objectives must take priority.

6. Request for Refusal of the Licence

I respectfully request that this aquaculture licence application be refused.

Introducing non-native Pacific oysters and associated infrastructure into this protected environment threatens its biodiversity, natural habitats and ecological integrity. If the oysters establish themselves beyond the farm, or if the seabed is substantially altered, the consequences may be irreversible.

This is a unique and irreplaceable natural environment. Its wildlife, native marine life and natural character deserve to be protected for future generations.

For these reasons, I strongly object to the proposed licence and believe this development must not be permitted within this Special Area of Conservation.

Yours sincerely,

Name [redacted]

Date 10-10-26

[redacted]