

An Bord Achomhairc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board



AP 6 /1 /2018

Appellant Name: Angela Putz, Robert Putz,
Angela Putz Jr., Anna Putz and Cashelfean
Developments Ltd and Dunmanus Bay Marine
Association

Site Ref: T05-590A

Appeal

**NOTICE OF APPEAL UNDER SECTION 40(1) OF
FISHERIES (AMENDMENT) ACT 1997 (NO. 23)**

Name and address of appellant:

**Appellant 1: Angela Putz, Robert Putz, Angela Putz Jr., Anna Putz and Cashelfean
Developments Ltd
Cashelfean,
Dunbeacon,
Durrus,
Bantry,
County Cork**

**Appellant 2: Dunmanus Bay Marine Association
Dunmanus
County Cork**

as representative association of:

The Association of Dunmanus Bay Fishermen
Ahakista Community Association Ltd.
Fishermens Inshore Saltwater Heritage Ltd
Goleen Community Council
Kikcrohane Development Association
Mizen Head Tourism Co-operative Society Ltd
Muintir Bhaire Community Council, company limited by guarantee
The Sheep's Head Way voluntary committee, consisting of landowners/farmers
and other representatives from the local community.



**Agent for Appellants:
Barry Doyle and Company
Solicitors
23 Merchants Quay
Dublin 8**

Telephone 01 670 6966 Fax: 01 670 6985
Mobile Tel: n/a E-mail address: info@doyleandco.com

Subject matter of the appeal:

**Application for long line mussel farm between Carbery Island and Drishane Point,
Dunmanus Bay, County Cork**

**Appeal Against: Determination of the Minister for Agriculture, Food and the
Marine**

Determination Reference: T05-590A

**Licence Applicant: Dunmanus Bay Mussels Ltd, Dromduff West, Bantry, County
Cork**

Site Reference Number:-

(as allocated by the Department of Agriculture, Food and the Marine) – T05-590A

Appellant's particular interest
in the outcome of the appeal:

First Appellant is a landowner of lands to the south of the proposed site and operates a holiday home business which would be damaged by the proposed activity.

Second Appellant represents a group of organisations having an interest in fishing, community and environmental matters in the area, all of which would be adversely affected by the proposed activity.

Outline the grounds of appeal (and, if necessary, on additional page(s) give full grounds of the appeal and the reasons, considerations and arguments on which they are based):

This is an appeal against a determination by the Minister for Agriculture, Food and the Marine to grant planning permission for a large mussel raising aquaculture activity in Dunmanus Bay at a site where ALAB refused a prior application due to inadequate tidal flushing. The Applicant has done little or nothing to establish that this prior conclusion by ALAB in 2012 was incorrect. The only evidence advanced is that the currents in the area are limited and suggests that a back-eddy forms on the flood and the ebb, leading to recirculation of water within a small area and consequent build up of effluent and detritus. As ALAB found in 2012, there is insufficient flushing in this area of the bay to accommodate a mussel farm.

See appeal submission attached.

Fee enclosed:..... €152.37

(payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 1998 (S.I. No. 449 of 1998))(See Note 2)

Signed by appellant:..... Date: 18 May 2018

Note 1: This notice should be completed under each heading and duly signed by the appellant and be accompanied by such documents, particulars or information relating to the appeal as the appellant considers necessary or appropriate and specifies in the Notice.

Note 2: The fees payable are as follows:

Appeal by licence applicant.....	€380.92
Appeal by any other individual or organisation	€152.37
Request for an Oral Hearing (fee payable in addition to appeal fee)	€76.18

In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded

Barry Doyle & Company
Solicitors
23 Merchants Quay
Dublin 8
DX 1081 Four Courts

To: The Aquaculture Licences Appeals Board (ALAB)
Kilminchy Court
Dublin Road
Portlaoise
Co Laois.
R32 DTW5

Appellant 1: Angela Putz, Robert Putz, Angela Putz Jr., Anna Putz and Cashelfean Developments Ltd
Cashelfean,
Dunbeacon,
Durrus,
Bantry,
County Cork

Appellant 2: Dunmanus Bay Marine Association
Dunmanus
County Cork

as representative association of:

The Association of Dunmanus Bay Fishermen
Ahakista Community Association Ltd.

Fishermens Inshore Saltwater Heritage Ltd

Goleen Community Council

Kikrohane Development Association

Mizen Head Tourism Co-operative Society Ltd

Muintir Bhaire Community Council, company limited by guarantee

The Sheep's Head Way voluntary committee, consisting of landowners/farmers and other representatives from the local community.

Agent for Appellants: Barry Doyle and Company
Solicitors
23 Merchants Quay
Dublin 8

Appeal Against: Determination of the Minister for Agriculture, Food and the Marine
Determination Reference: T05-590A
Licence Applicant: Dunmanus Bay Mussels Ltd, Dromduff West, Bantry, County Cork¹

¹ 41.—(1) For an appeal under section 40 to be valid, the notice of appeal shall—
(a) be in writing,
(b) state the name and address of the appellant,
(c) state the subject matter of the appeal,
(d) state the appellant's particular interest in the outcome of the appeal,

Date of Publication of Notice of Determination: 21 April 2018

Place of Publication: Southern Star

Deadline for Appeal: 21 May 2018 (20 May 2018 being a Sunday)

Summary

1. This is an appeal against a determination by the Minister for Agriculture, Food and the Marine to grant planning permission for a large mussel raising aquaculture activity in Dunmanus Bay at a site where ALAB refused a prior application due to inadequate tidal flushing. The Applicant has done little or nothing to establish that this prior conclusion by ALAB in 2012 was incorrect. The only evidence advanced is that the currents in the area are limited and suggests that a back-eddy forms on the flood and the ebb, leading to recirculation of water within a small area and consequent build up of effluent and detritus. As ALAB found in 2012, there is insufficient flushing in this area of the bay to accommodate a mussel farm.

Attachments

2. The following documents are attached:
 - Att01 – copy of notice from Southern Star dated 21 April 2018
 - Att02 – area photos prepared by First Appellant, Cashelfean Developments Ltd, showing location of proposed mussel farm as viewed from south side of Dunmanus Bay
 - Att03 – First Submission by Second Appellant, Dunmanus Bay Marine Association.
 - Att04 – Second Submission by Second Appellant, Dunmanus Bay Marine Association.
 - Att05 – Tide tables from UKHO for Ballycrovane Harbour (near the mouth of Dunmanus Bay) and Dunbeacon Harbour (near the head of the Bay.)

Legal Context

3. The criteria to be followed by ALAB or the Minister when determining a licence are as set out in S61 of the Fisheries (Amendment) Act 1997:-

61.—The licensing authority, in considering an application for an aquaculture licence or an appeal against a decision on an application for a licence or a

(f) be accompanied by such fee, if any, as may be payable in respect of such an appeal in accordance with regulations under section 63, and shall be accompanied by such documents, particulars or other information relating to the appeal as the appellant considers necessary or appropriate.

revocation or amendment of a licence, shall take account, as may be appropriate in the circumstances of the particular case, of—

- (a) the suitability of the place or waters at or in which the aquaculture is or is proposed to be carried on for the activity in question,*
- (b) other beneficial uses, existing or potential, of the place or waters concerned,*
- (c) the particular statutory status, if any, (including the provisions of any development plan, within the meaning of the Local Government (Planning and Development) Act, 1963 as amended) of the place or waters,*
- (d) the likely effects of the proposed aquaculture, revocation or amendment on the economy of the area in which the aquaculture is or is proposed to be carried on,*
- (e) the likely ecological effects of the aquaculture or proposed aquaculture on wild fisheries, natural habitats and flora and fauna, and*
- (f) the effect or likely effect on the environment generally in the vicinity of the place or water on or in which that aquaculture is or is proposed to be carried on—
on the foreshore, or
at any other place, if there is or would be no discharge of trade or sewage effluent within the meaning of, and requiring a licence under section 4 of the Local Government (Water Pollution) Act, 1977, and*
- (g) the effect or likely effect on the man-made environment of heritage value in the vicinity of the place or waters.*

Habitats Directive

4. A licence cannot be granted unless ALAB is satisfied either:

1, that the proposed activity is not “likely” to have a significant effect on a special protection area (SPA) or special area of conservation (SAC), meaning that it is established beyond reasonable scientific doubt that it will not have such an effect, or

2, that the proposed activity may have a significant effect on an SPA or SAC, but has been subjected to an Appropriate Assessment and ALAB has determined, again beyond a reasonable scientific doubt, that it will not adversely affect the integrity of that site,

5. ALAB also cannot grant a licence unless it is satisfied to the same standard that the proposed activity will not cause deliberate disturbance to a strictly protected species. A disturbance is deliberate if it is the natural and probable consequence of a person’s action.

Water Framework Directive

6. It is established for the purposes of the EU Water Framework Directive 2000/60 that an activity must not cause a deterioration in water quality. A deterioration occurs where the status of the water body is lowered by one level in respect of one parameter. See Case C-461/13 *Bund*.

Burden of Proof

7. Where a person proposes to carry out an activity within an area of foreshore, and where that activity will convert a part of the natural environment for use by a private individual, the burden of proving that the proposed activity is suitable lies on the person proposing to carry it on.
8. This is in accordance with the polluter pays principle which is a fundamental rule of the Treaty on Functioning of the European Union and which forms the background to all European environmental Directives.

Unseen Documents

9. This appeal is based on the following documents:
 - Application form by Dunmanus Bay Mussels Ltd
 - Documents accompanying the application:
 - Supplementary Information and Environmental Report, 6 December 2013, prepared by Cronin Millar
 - Habitats Directive Screening Report, September 2013 prepared by EirEco Environmental Consultants
 - Bathymetric and Current Modelling Data dated 19 October 2012 by Cronin Millar.
 - Appropriate Assessment Screening for Aquaculture Activities in Dunmanus Bay, prepared by the Marine Institute and dated July 2017
 - Ministerial Determination in relation to EIS Requirements for an Application for an Aquaculture Licence for the cultivation of shellfish by Dunmanus Bay Mussels Ltd in Dunmanus Bay County Cork, Site Ref: T5/590A, dated 3 October 2017.
 - Determination of Aquaculture Licence Application T05/590A, by the Minister for Agriculture, Food and the Marine, undated.
10. Should the Minister furnish any additional documents pursuant to Section 43, ALAB should note that the Appellants have not seen such documents and have not had the

opportunity to make submissions on them, or to formulate grounds of appeal arising from them.

11. The Appellants note that there is no statutory obligation on the Minister to make the full file available for inspection. The Appellants' rights under the Access to Information on the Environment Regulations 2007 do not confer a right to see the file within the time permitted for bringing an appeal. Accordingly, it is not possible for the Appellants to make submissions or formulate grounds of appeal on any such documents.
12. It is imperative for the purposes of a fair hearing in accordance with the rules of natural justice that the Appellants be given the opportunity to address any such documents.

Requirement for EIA and AA

13. The Minister determined on 3 October 2017 that an environmental impact assessment (EIA) and an appropriate assessment (AA) under the Habitats Directive and implementing regulations were not required.

14. Reasons were given as follows:

I had regard to the provisions of:

- (a) Regulation 5 of the Aquaculture (Licence Application) Regulations, 1998;
- (b) EIA Directives (codified by Council Directive 2011/92/EU) and amended by Council Directive 2014/52/EU;
- (c) The criteria specified in Annex III of Directive 2011/92/EU;
- (d) As the screening for this application commenced before the 16th May, 2017 (date for Member States implementation of the 2014 Directive), it is being carried out in accordance with the provisions of the 2011 Directive;
- (e) The guidance contained in the European Commission documents entitled "Guidance on ETA, Screening" June 2001 and interpretation of definitions of project categories of Annex I and Annex II of the EIA Directive (2015); and also to the report and recommendations of the Department's with particular reference to:
 - (f) the nature and scale of the proposed aquaculture activity — cultivation of Blue Mussels on longlines on a 26.3 ha site
 - (g) the limited magnitude and extent of the direct impacts arising from the proposed aquaculture activity
 - (h) the absence of any protected structures or recorded monuments in the area of the proposed aquaculture activity
 - (i) in general views of mussel longlines will be obscured and limited from the adjacent scenic routes
 - (j) the low visual impact of the proposed aquaculture activity

- (k) the non-use of toxic or hazardous substances as part of the proposed aquaculture activity*
- (l) the minor risk of accidents occurring as result of the proposed aquaculture activity*
- (m) the low risk of impacts on navigational safety*
- (n) the minimal impact on recreational use of the adjoining foreshore*
- (o) Appropriate Assessment Screening for aquaculture activities in Dunmanus Bay, Co. Cork July 2017.*

15. The EIA screening report on which this conclusion is based concludes that this is a project of a Class for which EIA is required under Annex II of the EIA Directive. Annex II Class 1(f) stipulates that EIA will be required for the following activity, where it is likely to have significant effects on the environment:

“(f) Intensive fish farming;”

16. Annex II is implemented into Irish law by Schedule 1 Part II of the European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1999 (S.I. No. 93/1999.)

17. Schedule 1 Part II requires EIA in the following cases:

“(f) Seawater fish breeding installations with an output which would exceed 100 tonnes per annum; all fish breeding installations consisting of cage rearing in lakes; all fish breeding installations upstream of drinking water intakes; other fresh-water fish breeding installations which would exceed 1 million smolts and with less than 1 cubic metre per second per 1 million smolts low flow diluting water.”

18. The application acknowledges that this activity will produce 190 tonnes per year in the second year, and 250 tonnes per year thereafter. This is above the 100 tonne threshold. An EIA is therefore mandatory.

19. The EIA Screening Report nonetheless goes on to apply the selection criteria set out in Annex III of the EIA Directive (Schedule 2 of the 1999 Regulations). It is not clear why it does so: once the threshold is exceeded, this exercise is redundant.

20. The Screening Report concludes that the proposed activity is not likely to have a significant effect on the environment in spite of the production of faeces and proto-faeces, and other detritus such as empty shells and dead mussels, because, it concludes:

“... The area impacted by faeces and pseudofaeces produced will be limited to the area of the site. The site is well flushed and build up of excess organic matter with subsequent reduction in oxygen is not considered likely. Amounts of discarded shells will be small and build up of excess on site will not be

permitted. Discarding of damaged or other materials will not be permitted into the sea or on the foreshore."

21. This conclusion is not based on any scientific evidence in the application or screening report, or elsewhere in the documents.
22. The conclusion is self-contradictory. Flushing, if it occurs, will move faeces etc. out of the site. If it is left in the site, on the other hand, it will build up there.
23. This conclusion contradicts the conclusion reached by ALAB when it refused a licence in 2012. It concluded then that the tidal flushing of the area was small.
24. There is minimal evidence of tidal conditions in the application. The evidence such as it is consists of two sets of measurements taken on one day 19 October 2012, at either end of the site. It is not indicated whether the tide was a spring or neap tide, but research carried out by the Appellants indicates it was a spring tide. As ALAB will be aware, water flows in spring tides are generally double those in neap tides. The tide predictions at Att-05 confirm this: tidal range in springs is c3.5m, in neaps it is c2m. The figures stated are maximum values and neap flow will be only about 50% of the value indicated. Hence, while the max flow will be c0.9kmh, flow for most of the tide will be about 1/3 that, in springs. Reduction of 50% across the Board will apply in neaps.
25. The graphs extrapolating the tidal direction are incoherent because they represent any change in flow direction passing through 0° as though it occurred in the opposite direction. For instance, if the flow direction changed from 359° to 1° , instead of showing a change of 2° a change of 358° would be apparent.
26. In any event, the conclusion reached, that there is adequate flushing, contradicts the conclusion reached by ALAB in 2012 and there is no evidence to justify it. ALAB's 2012 refusal also shows that build up of detritus from inadequate flushing is a real risk of a significant impact on the environment. That conclusion of itself shows that an EIA is required.
27. Furthermore, the conclusion that there will be no build up of detritus because this will not be allowed would require imposition of conditions on the licence. The determination published by the Minister on the Department's website contains no conditions. Accordingly, there is no basis for this conclusion.
28. Even if there were conditions, the possibility of eliminating significant effects by mitigation measures is not a reason for not requiring an assessment: the purpose of an assessment is to establish what mitigating measures are required. (See the recent decision of the CJEU in Case C-323/17 *People Over Wind v. Coillte*.)

29. Finally, although the screening report examined the criteria laid down in Annex III, it did not examine them with regard to the purpose of environmental impact assessment, as set out in Article 3:

- (a) The environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 12, the direct and indirect effects of a project on the following factors:*
- (b) human beings, fauna and flora;*
- (c) soil, water, air, climate and the landscape;*
- (d) material assets and the cultural heritage;*
- (e) the interaction between the factors referred to in points (a), (b) and (c).*

30. In the present case the screening did not consider the impact on otter or cetaceans which are strictly protected under Annex IV of the Habitats Directive, even outside special areas of conservation. Though otter and cetaceans were considered in the developer's screening application, they are not mentioned in the Marine Institute's AA screening document or in the EIA screening document. The Habitats Directive requires that there must be no deliberate disturbance of these species. It is the function of the decision maker, before granting consent, to identify what the effects of a proposed project will be so that the developer cannot plead his / her own ignorance or inadvertence as a defence for the disturbance of a strictly protected species. A decision maker, such as ALAB, must assess and identify the likely effects, so that those effects can be avoided and so that the strict protection of species is not set at naught through inadequate knowledge. This is an obligation which falls on ALAB directly as a consequence of Art 4(3) of the Treaty on the Functioning of the European Union, and its duty of sincere cooperation as a competent authority under the EIA and Habitats Directives. (See Case C-103/88 *Fratelli Costanzo*.)

31. In the application it is conceded at para 3.3:

There is likely to be considerable otter activity in the general vicinity of the proposed farm although this activity is likely to occur along the shallower shoreline. The closest otter holt is likely to be on Holt Island, which is approximately 700m from the proposed farm. The mussel farm is unlikely to create any disturbance to the otter community.

32. Later at 2.2.5 of the developer's screening report, it is stated:

*Otter (*Lutra lutra*) are reported as being widespread within Dunmanus Bay and there is evidence that Cold Island to the southwest of the proposed site, is used as a holt location. The shoreline to the south of the proposed site is also well suited for both holt, couch and foraging usage. The site itself is in water too deep to support foraging by otter. A variety of cetacean species have been recorded in Dunmanus Bay in recent years, with results compiled by the Irish Whale and Dolphin Group presented in Table 3 for the period 2007-2012*

(Source, RPS Technical Advisors Report 761363). [The cited report is not appended, and the Appellants have been unable to comment on it.]

33. A table follows, showing that up to 100 common dolphin and up to 3 minke whale at a time have been recorded in the Bay. The conclusion reached is as follows:

On the basis of the data recorded, it can be surmised that periodic occurrence of small to medium sized cetaceans occurs within Dunmanus Bay on an occasional basis primarily during the summer period. Unidentified whale species recorded are likely to be Minke whales, the most widespread of the baleen whales and the species most frequently encountered in inshore environments. The sporadic occurrence of cetaceans within the Bay suggests movements are likely to be primarily associated with movements in pursuit of fish prey. All cetacean species are afforded protection under Annex IV of the EU Habitats Directive

34. The different holt locations hypothesised in the two reports are not explained. No explanation is offered as to why the site is in water too deep for otter to forage in. No consideration is given to the risk of whale or dolphin becoming entangled in the mussel lines. There is no consideration of what the effect would be on whale or dolphin if the lines parted from their anchor in a storm. There is also no consideration of the potential impact on a boat propeller if it became entangled in a parted line. These are all risks which require assessment.
35. Cetaceans have been sighted in the bay, as noted above, and as visible in the submission by Dunmanus Bay Marine Association to the Minister (appended). The creation of a mussel farm taking up a large portion of the bay will necessarily make that area unavailable to whales and dolphins, and this will amount to a disturbance to them.
36. For all of the above reasons, it is submitted that an EIA is required, and that the Minister erred in not conducting one.
37. An AA is also required because there is no evidence to justify the conclusion that there will be no impact on neighbouring SACs. The build up of faeces and protofaeces in the water may, depending on a proper knowledge of tidal movements, have an impact on water quality within the Bay which may in turn affect the perennial vegetation of stony banks for which those sites are designated.

Substantive Appeal Grounds

38. It is proposed to address the appeal by reference to the criteria set out in S61 of the 1997 Act.

(a) The suitability of the place or waters at or in which the aquaculture is or is proposed to be carried on for the activity in question,

39. The Minister determined as follows:

(a) Technical advice is to the effect that the waters are a suitable location for the operation of a suspended rope mussel culture facility with adequate flushing rates;

40. The only technical advice availed of by the Minister, as disclosed on the Department's website, are the EIA and AA screening documents which do not address the flushing rate.

41. There is no technical advice which addresses the flushing rate. (If there is additional advice, it was not available to the Appellants under the Access to Information on the Environment Regulations within the time allowed to make the appeal, and as above the Appellants ask ALAB to circulate it under S47 when received by ALAB under S43. The Appellants will then formulate such submissions as may arise out of that technical advice.)

42. The evidence advanced by the Applicant is inadequate to provide any reasonable measure of certainty as to tidal flows and flushing. Measurements were taken on one day only, 19 October 2012, and at two locations only, the eastern and western end of the site. They do not state whether they were taken at spring or neap tides, but research carried out by the Appellants indicates it was a spring tide. Tidal flow would be ½ as strong at neap tides. See tidal predictions at Att05 which are taken from the UK Home Office, 'Easytide' site. Tidal range in springs is c3.5m, in neaps it is c2m. The figures stated are maximum values and neap flow will be only about 50% of the value indicated. Hence, while the max flow will be c0.9kmh, flow for most of the tide will be about 1/3 that, in springs. Reduction of 50% across the Board will apply in neaps.

43. The tidal data do not show the movement of water through the bay as a whole, so it is impossible to determine if there is any flushing of water from the bay. They do not take account of the flow at the islands to the west, or the headland to the north east, both of which are likely to determine the movement of water into and out of this area of the bay.

44. The graphs relating to current velocity, such as they are, show that the current does not exceed 0.4 m/s (approx 1.4kmh), and is for most of the time below 0.1 m/s (0.35kmh). At neap tides, flow would be anticipated to be 0.75kmh max, but seldom above 0.05m/s (0.125 kmh). This is a very slight, effectively negligible, tidal flow.

45. The graphs extrapolating the current direction preclude a full rotation in the direction of flow. For instance, if the flow direction changed from 359^o to 1^o, instead of showing a change of 2^o a change of 358^o would be apparent. Hence, although the

graph appears to show a widely varying direction, in fact the major variations at the 20 and 25m depths could actually represent a small number of degrees change passing through 0° (due north). Apart from this, the general direction on the ebb tide (after high water) at all depths, appears to be north eastwards, into the bay. The general direction at the shallower depths on the flood (before high water) is south westwards, towards the mouth of the bay. This is the classic pattern of a back eddy, suggesting that the water is not being flushed into or out of the bay in this location but is instead being recirculated around the bay. This effect is exacerbated by the low flow which means little if any water will leave the bay. It might be anticipated that this effect would be localised to the area south of a line running from Carbery Island to Drishane Point; but in the absence of any evidence, this can only be conjecture.

46. Effectively the data, such as it is, suggests that the main flow into and out of the bay lies to the north of the chain of islands to the west (Carbery Island, Horse Island, Furze Island, Cold Island, etc), and that the proposed location of the mussel farm is in a back eddy to the south of the main flow. This may reduce exposure to storm damage, but will increase the tendency of material to accumulate beneath the lines. This accords with ALAB's conclusions in 2012.
47. A full range of tidal measurements taken in different tidal and wind conditions at a range of locations, including to the north in more open water, to the west at the channels between the islands, and to the north east at the Drishane Point would be necessary before a grant could be contemplated.

(b) other beneficial uses, existing or potential, of the place or waters concerned,

48. The Minister concluded, in relation to this criterion:

- b) There is no significant impact anticipated on existing beneficial usages of the local shore area;*
- c) In general, views of the mussel longline site are obscured and limited from the adjacent scenic routes;*
- d) The landscape character will not be dramatically altered as the development will integrate with the existing bay;*
- e) The aquaculture activity should have a positive effect on the economy of the local area;*

49. Conclusion (b) is too limited. It does not properly address uses of the place, and does not address use of the waters at all.

50. As to place, beyond the immediate shore area lies the First Appellant's property which is used as a complex of tourist accommodation and a stud farm. Cashelfean Development Ltd runs a large farm, comprising a large horse stud (breeding ponies and Irish cobbs) and a large herd of pedigree Aberdeen Angus cattle. It also runs a number of holiday homes, nine of which are located in the Dunmanus Bay area

overlooking the proposed development. It has invested significant amounts of money in establishing this business and at the height of the season employs up to 30 people locally. The holiday homes attract over 2,500 people every year which gives a significant boost to the local economy. The primary attraction for visitors apart from the quality of the holiday homes is the beauty and unspoilt nature of Dunmanus Bay. The mussel farm will make Dunmanus Bay less attractive to tourists and will inevitably damage the business of Cashelfean Development Ltd. with subsequent knock on effect to the local economy.

51. Above the First Appellant's property lies a roadway which forms part of the Wild Atlantic Way. The proposed fish farm will have a negative impact on both. The Wild Atlantic Way is a major tourism marketing campaign intended to attract tourists from around the world to the rugged and unspoilt wonders of Ireland's Atlantic coastline. The tourist experience depends on the impression of a pristine environment. That experience is undermined by the view of a commercial fish farm from the roadway. The same applies to a much greater extent in relation to the First Appellant's property which would be directly impacted by the construction of a mussel farming unit adjacent to it.
52. On the other side of Dunmanus Bay lies Sheep's Head with its Sheep's Head waymarked trail. This is a walking and cycling trail that is marketed to tourists. In the area of Ahakista the trail will look down on the proposed mussel farm. As with the Wild Atlantic Way, the presence of a buoyed and marked mussel farm will devalue the tourists' experience of a pristine, unspoilt environment. This will have negative consequences for the local economy which is heavily reliant on tourism.
53. It is noted that the Minister did not invite comment from Failte Ireland on this proposal. Failte Ireland is an authority which is required to be consulted in an EIA of the project.
54. The organisations which are members of the Second Appellant carry out fishing, kayaking, and boating activities in the area of the proposed farm, and make use of Kiltomane Pier as a landing spot. The proposed farm will interfere with that use, and will devalue the tourist offering in the area.
55. As to use of the waters, the Minister does not consider the use of the area by otter, cetaceans, sailing vessels and other fishermen. Otter and cetaceans have been addressed above in relation to the requirement for EIA. They are strictly protected species and it is not lawful to grant authorisation for activities that will cause disturbance to them.
56. As noted in the submission by Dunmanus Bay Marine Association to the Minister, sailing boats beating out of Dunmanus Bay against the wind need the entire width of the Bay to make progress into the wind. Construction of a mussel farm at this location would prevent them doing so. In this respect, ALAB should take notice of the fact

that, as one progresses towards the open sea, the wind tends to pick up, and sailing ships need a longer tack to make progress into the wind before they go about.

57. Also, as apparent from the photos in the Dunmanus Bay Marine Association submission to the Minister, the proposed mussel farm is in use by members of the Second Appellant, and others, as a fishing ground at present, and several boats ply the area. The introduction of long lines and the creation of faeces, protofaeces and detritus in the area and on the seabed will severely restrict this activity which is a highly productive, sustainably managed, year round fishing ground, targeting different species as they come into and go out of season. 12 local boats participate in this fishing activity.

58. Hence, there will be several highly significant impacts on existing uses of the bay.

59. Conclusion (c) is also incorrect. As part of the Wild Atlantic Way project, owners of land adjoining the way are encouraged to cut back the vegetation to ensure uninterrupted views. Work on this is ongoing and views of the bay are already greatly enhanced. This effort will continue into the future, ensuring that views of the mussel longline site from scenic routes are uninterrupted.

60. Conclusion (d) is incorrect. The change from an unmodified marine environment to one where mussel longlines are buoyed and visible is a fundamental change from the type of environment which is fundamental to the Wild Atlantic Way project to a commercial / industrial environment.

61. In light of the above errors, the resulting conclusion at (e) of the Minister's determination, that the proposed development should have a positive effect on the local economy, is unsubstantiated. There was no evidence capable of supporting it. This appeal shows the evidence that contradicts that conclusion.

(c) The particular statutory status, if any, (including the provisions of any development plan, within the meaning of the Local Government (Planning and Development) Act, 1963 as amended) of the place or waters,

62. The Minister made no finding in relation to this criterion.

63. County Development Plan Objective CS4-4: West Cork Strategic Planning Area (p33) includes the following:-

d) Recognise the international importance and the importance to the region's tourism economy, of the scenic and landscape qualities of the coastal and upland areas, particularly along the peninsulas in the southwest and to protect these landscapes from inappropriate development;...

f) Encourage a vibrant and well populated countryside, recognising the need to strengthen and protect the rural communities of the area by encouraging

sustainable and balanced growth in both urban and rural populations, maintain traditional rural settlement patterns in rural areas and the islands, protecting agricultural and fishery infrastructure and productivity and focusing other employment development in the main towns and key villages;
g) *Recognise the need to encourage the diversification of the rural economy by promoting a stronger tourism and leisure economy both through the protection of the area's natural and built heritage and by encouraging appropriate new forms of employment development; ...*

and

k) *Recognise the role to be played by Castletownbere and its deepwater port facilities in the future growth of the fishing and tourism industry and to promote its future development and potential for other port related activities subject to the requirements of the Habitats, Birds, Water Framework, SEA and ELA Directives.*

64. Note that fishery infrastructure and productivity is merely protected, while tourism is actively promoted. There is no promotion of new fisheries activity, other than at Castletownbere, and even there the development is as much based around tourism as around fishing, and environmental constraints are recognised as paramount.

65. Para 8.2.1 of the Cork County Development Plan 2014 has this to say about the area:

8.1.12 Tourism in County Cork is based on its rich natural and built heritage. The principle features of the area's tourism product include; mountains and upland habitats; rivers and lakes, over 1100 km's of scenic rugged coastline and peninsulas with long stretches of sandy beaches, fertile agricultural land and many upland peatlands and forest/woodland areas. These natural assets combined with a rich heritage of archaeological and historical sites, built environment including manor homes and gardens, attractive towns and villages offer a unique tourism product.

8.1.13 Many areas that are important to the tourist industry of County Cork owe their attraction to the exceptional quality of the landscape or particular features of the built environment. It is important to recognise the valuable role of natural assets such as lakes, rivers and forests as economic resources for tourism, particularly in rural areas, and to protect and enhance the qualities of such areas so that they can continue to contribute to the growth in tourism visitors into the County as a whole. Figure 8.1 "Key Tourism Assets" shows the diversity and spread of existing tourism assets throughout the County and the range of activities and infrastructure.

8.2.1. ...

8.2.1 County Cork has a wide range of nationally significant tourism assets namely (See Figure 8.1 Key Tourism Assets); ...

The Coastline –over 1100kms of scenic coastline and peninsulas. Marine related activities including some fine blue flag beaches;

The West Cork Peninsulas (Beara, Mizen, Sheeps Head) – with their unique visual amenity and landscape character offer potential for walking and cycling and other outdoor activities;

66. The West Cork Peninsulas are listed as “Key Tourism Assets” at figure 8.1.
67. Appendix E, Landscape Character Assessment of County Cork states that the Landscape Character Type, “Rugged Ridge Peninsulas” have a Landscape Value and Sensitivity that are “Very High” and that they are of “National” Landscape Importance.
68. These statements are highly significant. Although the site of the proposed activity, being located below the high water mark, is not within the functional area of the County Council, the “place” on which they have an impact is. The Act requires that ALAB have regard to that place, and the County Council has determined that the development of tourism within that place is more important than the development of fisheries.
69. It is noted that there is no evidence that the Minister requested any input from Cork County Council on this matter.

(d) The likely effects of the proposed aquaculture, revocation or amendment on the economy of the area in which the aquaculture is or is proposed to be carried on,

70. This has been dealt with above: the Minister reached a conclusion in relation to economic benefit without having regard to the likely impact on tourism, on sailing vessels beating out of the Bay, or on existing fishing uses of the area. The effects of the project will be to restrict the local fishing activity in the area with adverse employment consequences. Vessels which fish in this area will no longer be able to do so: contrary to the Applicant’s assertion, it will not be possible to fish between lines in adverse weather conditions, and the build up of detritus beneath the site will in any event restrict the fishing opportunities in the area.
71. The effects on sailing will reduce the attractiveness of Dunmanus Bay to sailors and therefore as a tourism destination. The visual effects of the farm will eliminate the rugged appeal and unspoilt beauty of the Wild Atlantic Way, and will adversely affect the tourist economy of the area, and in particular the business of the First Appellant.

**(e) the likely ecological effects of the aquaculture or proposed aquaculture on wild fisheries, natural habitats and flora and fauna, and the effect or likely effect on the environment generally in the vicinity of the place or water on or in which that aquaculture is or is proposed to be carried on—
on the foreshore, or**

at any other place, if there is or would be no discharge of trade or sewage effluent within the meaning of, and requiring a licence under section 4 of the Local Government (Water Pollution) Act, 1977, ...

72. The Minister concluded as follows:

- f) The Minister has already determined that the aquaculture activity is not likely to have a significant effect on the environment and that an Environmental Impact Statement is not required for this project. The reasons and considerations for the Minister's determination are available on the Department's website;*
- g) The site is not located in a Natura 2000 area but is adjacent to the Dunbeacon Shingle Special Area of Conservation (SAC) and there are a number of other Natura 2000 sites in the vicinity, namely the Sheeps Head SAC, the Sheeps Head to Toe Head Special Protection Area, Reen Point Shingle SAC and the Farranamanagh Lough SAC. The proposed aquaculture activity does not spatially overlap with the Natura 2000 sites and there will be no significant effects posed by the culture of shellfish at this current level, on any of the qualifying interests of the Natura 2000 sites (The Screening Matrix for Aquaculture Activities in Dunmanus Bay is available on the Department's website);*
- h) Taking account of recommendations requiring full implementation of the measures set out in the draft Marine Aquaculture Code of Practice prepared by Invasive Species Ireland;*
- i) All issues raised during the public and statutory consultation phases;*
- j) The updated and enhanced Aquaculture and Foreshore Licences contain terms and conditions which reflect the environmental protection required under EU and National law.*

73. The requirement for an EIA has been dealt with above. An EIA is required to assess in particular the likely effect of the project on cetaceans and otter in the vicinity of the site; the likely effect of any accident or storm damage as a result of which the long lines might become detached and be loose within the Bay; and the likely effect of mussel faeces and proto-faeces having regard to the slow tidal movement and flushing of the bay.

74. Otter will be affected by the build up and potential dispersal of faeces around the south shore of the Bay and the islands close to the proposed development. Otter are particularly susceptible to changes in water quality. The proposed development will necessarily cause disturbance to them in their habitat.

75. Cetaceans would be unable to navigate the area of the Bay where the long lines would be located. This constitutes a disturbance to their natural hunting and foraging areas. Photographic evidence shows this area is used by minke whale.

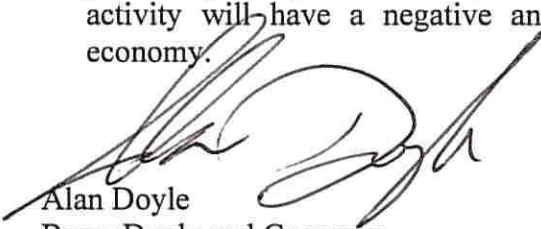
76. There is no evidence of impact on water quality as required for all consent processes under Case C-461/13 *Bund*. Faeces and protofaeces as well as other detritus will accumulate beneath the site. Depending on tidal movements, they may also be washed up on the shore adjacent to the First Appellant's property, and may reduce water quality near the Appellant's property. These are serious issues which need to be investigated and understood, and on which the Appellants must have the opportunity to comment before any decision is taken.
77. There is no consideration as to whether the build-up of faeces and proto-faeces on the site may have an adverse impact on the perennial vegetation of stony banks for which several of the nearby special areas of conservation are designated. An impact on water quality, if it accumulates, and depending on tidal movements, may affect that vegetation. Having regard to the incorrect conclusion reached in relation to flushing, it is not safe to conclude that an appropriate assessment is not required for potential significant effects on these sites.
78. The updated and enhanced aquaculture and foreshore licences referred to have not been made available as part of the decision and the Appellants have not had the opportunity to comment on them. This failure is in breach of fair procedures, and a valid determination cannot be made on the basis of material on which there has been no right to comment.
79. For all the above reasons, there is insufficient evidence to warrant a conclusion that this statutory requirement has been satisfied.

(g) The effect or likely effect on the man-made environment of heritage value in the vicinity of the place or waters.

80. The Minister reached no conclusion in relation to this criterion.

Conclusion

81. For the above reasons the Appellants submit that an EIA and AA are required; that ALAB should refuse a licence for the same reason outlined in its 2012 decision – namely that there is inadequate flushing in this area of Dunmanus Bay, and that faeces, proto-faeces and detritus will accumulate in the area of the long lines and potentially along the shore adjacent to the First Appellant's property. The proposed activity will have a negative and deleterious impact on tourism and the local economy.


Alan Doyle
Barry Doyle and Company

Barry Doyle & Company
Solicitors
23 Merchants Quay
Dublin 8
DX 1061 Four Courts

Att01
Copy Notice

West Cork FARMING & FISHERIES 21

FISHERIES (AMENDMENT) ACT, 1997 (NO. 23) AND FORESHORE ACT, 1933 (NO. 12) NOTICE OF DECISIONS TO GRANT AQUACULTURE AND FORESHORE LICENCES

The Minister for Agriculture, Food and the Marine has decided to grant Aquaculture and Foreshore Licences to:

File References	Applicants	Minister's Decisions	Species, No. of Sites and References
T05/473A	Mr. Jean Paul Mestre, 2 Fairy Hill, Monkstown, Co. Cork	Grant Renewal	Pacific Oysters using bags and trestles on the north shore of inner Dunmanus Bay, Co. Cork - 1 Site: T05/473A
T05/590A	Dunmanus Bay Mussels Ltd, Dromduff West, Bantry, Co. Cork	Grant	Mussels using longlines and ropes at outer Dunmanus Bay, Co. Cork - 1 Site: T05/590A

The reasons for these decisions are elaborated on the Department's website at: <https://www.agriculture.gov.ie/seafood/aquacultureforeshoremanagement/aquaculturelicensing/aquaculturelicencedecisions/cork/>

An appeal against an Aquaculture Licence decision may be made in writing, within one month of the date of its publication, to THE AQUACULTURE LICENCES APPEALS BOARD, Kilminchy Court, Portlaoise, Co. Laois, by completing the Notice of Appeal Application Form available from the Board, phone 057 86 31912, e-mail info@alab.ie or website at <http://www.alab.ie/>

A person may question the validity of a Foreshore Licence determination by way of an application for judicial review, under Order 84 of the Rules of the Superior Court (SI No. 15 of 1986). Practical information on the review mechanism can be obtained from the Citizens Information Board at: <http://www.citizensinformation.ie/>

www.agriculture.gov.ie

[@agriculture_ie](https://twitter.com/agriculture_ie)



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

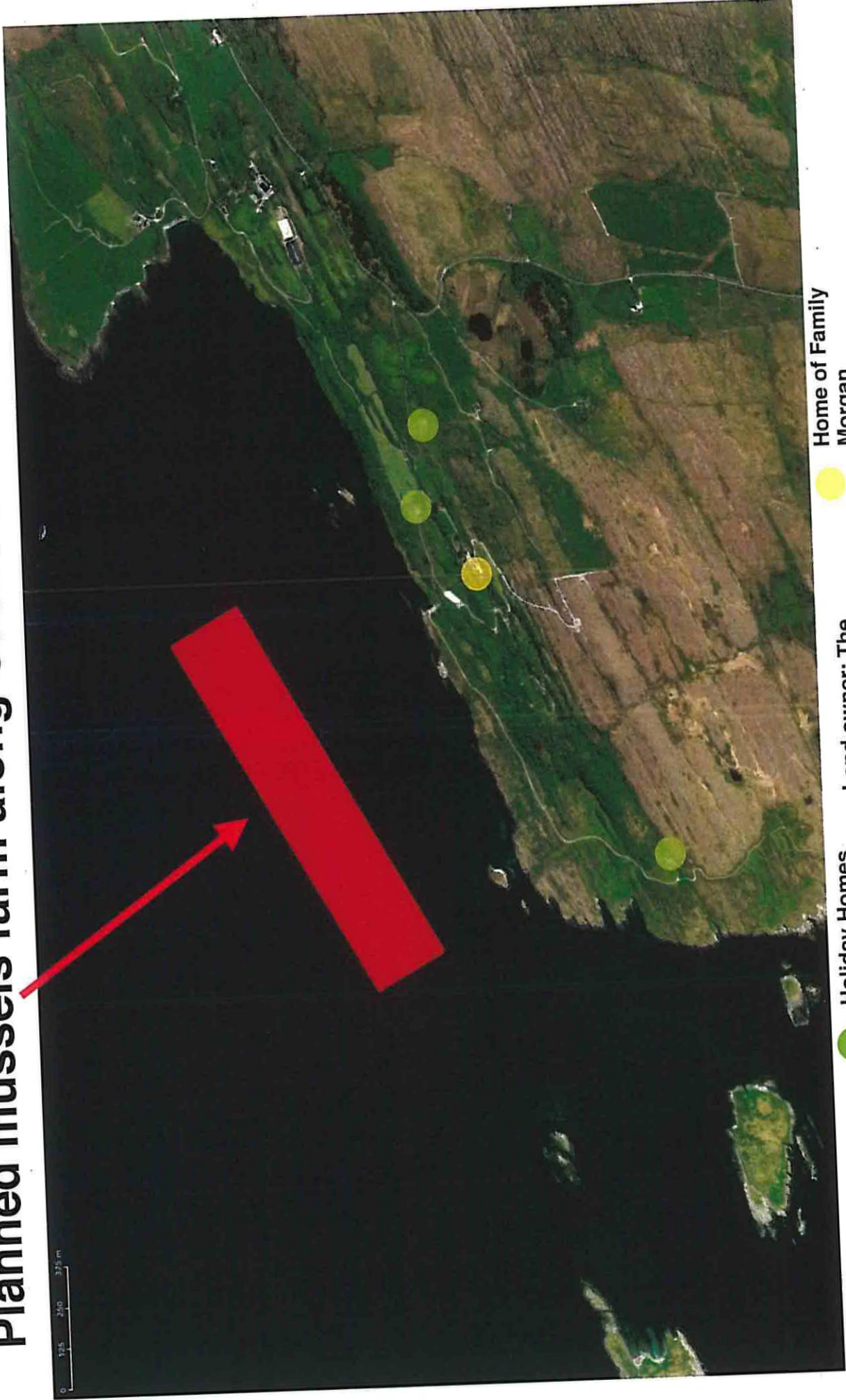
Minis-
Food

his week,
land (MII)
Healy hailed
it as 'an im-
ough for the
noting that
ars of effort.
ork with Ag-
in Dublin and
orities

ay comfy

Att02
Area Photos

Planned mussels farm along Cashelane Farm



- Home of Family Morgan
- Land owner: The Estate of the late Franz Robert Putz
- Holiday Homes
 - Ballyvonane
 - Kilicomane
 - Carbery IV



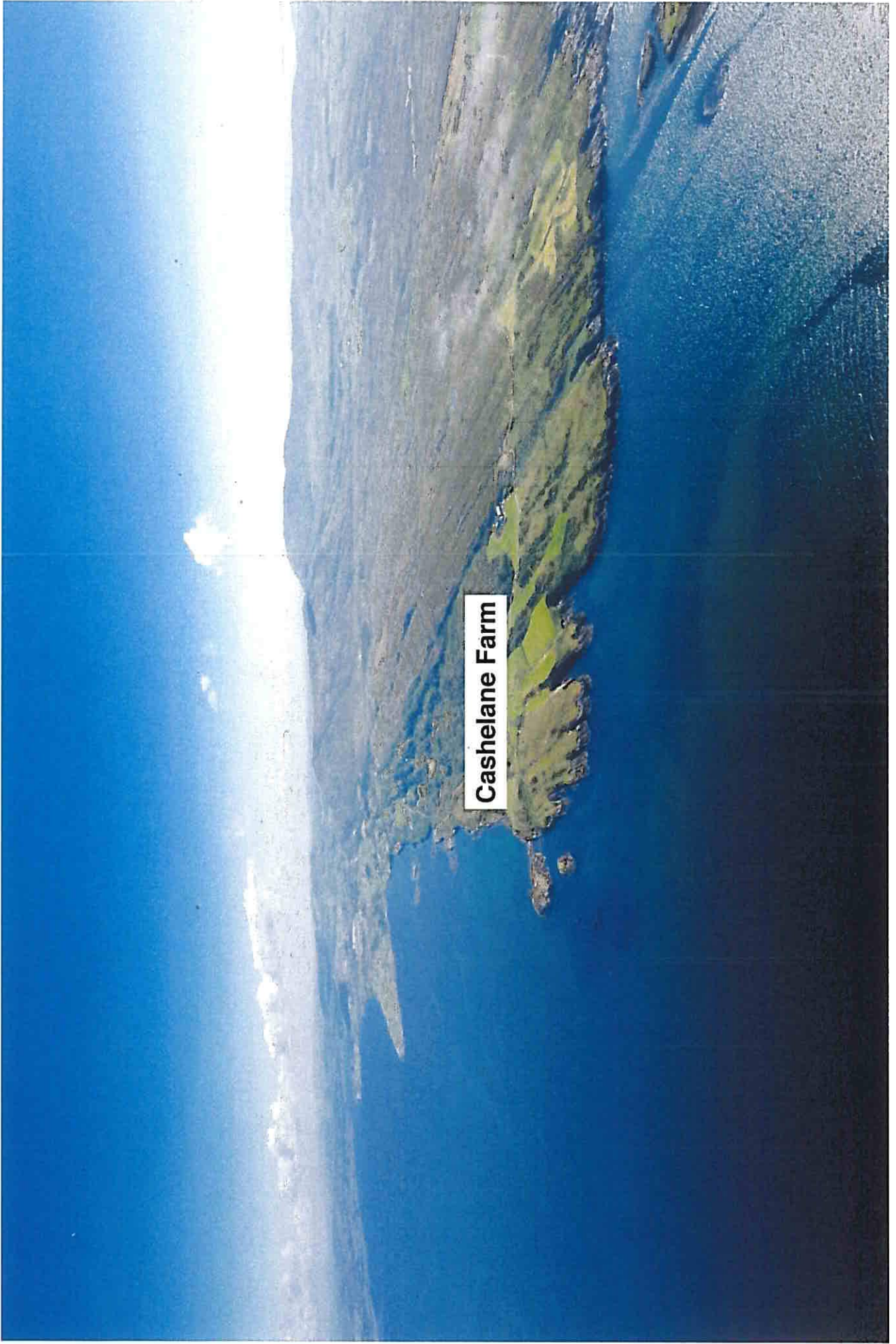
Cashelane Farm

Cashelane Farm

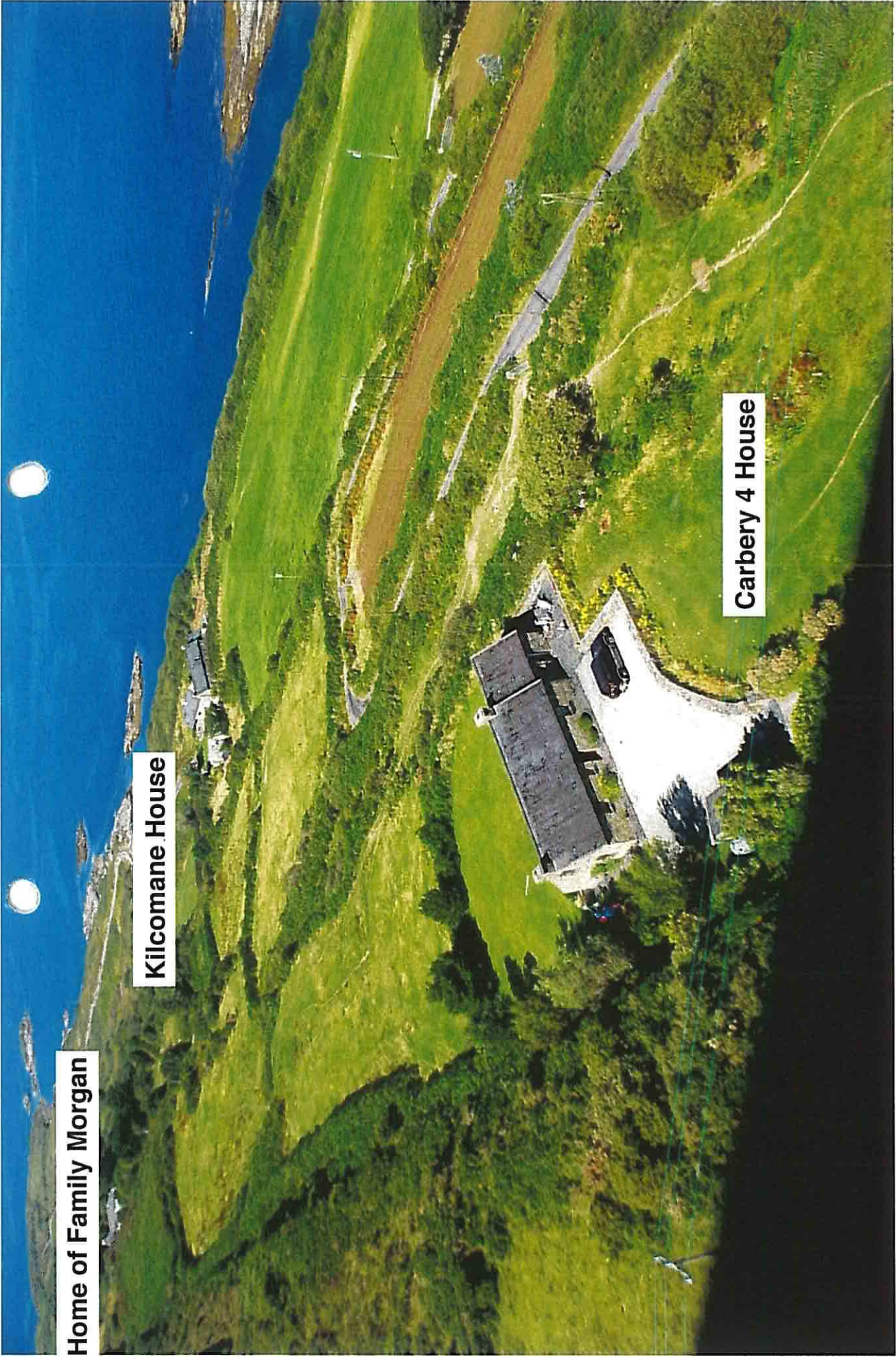
Cashelane Farm



Kilcomane House



Cashelane Farm



Home of Family Morgan

Kilcomane House

Carbery 4 House

Att03

**First Submissions of Dunmanus
Bay Marine Association**

Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org

Dear Minister,

We represent the following organisations: The Association of Dunmanus Bay Fishermen, Fishermen's Inshore Saltwater Heritage Ltd, Goleen Community Council, Ahakista Community Association, Kilcrohane Development Association, Muintir Bhaire Community Council, The Sheep's Head Way, Mizen Head Tourism Co operative Society Ltd and Barley Cove SAC, and attached 422 signatures from landowners and residents on both sides of Dunmanus Bay and those on our online petition <https://www.ipetitions.com/petition/savedunmanusbay> which continues to gather signatures.

We object to the new planning applications ref T05/590A, for aquaculture and foreshore licenses for an intensive mussel farm in Dunmanus Bay, outside Kiltomane Pier and directly across from Ahakista. These applications are a repeat of similar applications T05/590 for the same location, denied 5 years ago. The revised applications, engineer's report and photos are date stamped 2013/14 and thus out of date and largely invalid.

Despite the offhand reference to "fishermen ad hoc" in the application, the area is a highly productive, sustainably managed, year round fishing ground, targeting different species as they come in and out of season. 12 fishing boats from both sides of the Bay congregated there on a November day to protect their ground which has supported fishermen and their families for generations back into the mists of time and hopefully will continue for generations into the future..

When the Fisheries (Amendment) Act 1997 was passed and licenses were being sought for unlicensed mussel farms, the Dunmanus Bay Fishermen decided not to protest mussel installations already in situ. In effect the fishermen gifted without rancour, a portion of their livelihood to the mussel farmers and said goodbye to what had been productive sheltered fishing ground for small boats. Now after 20 years of intensive mussel culture, this area is environmentally destroyed, the ground under and around the lines and the foreshore deep with detritus and discarded mussel socks.



Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org

Evidence of the applicant's failure in best practice is to be found at applicant's abandoned mussel farm installation at Gouladoo in Bantry Bay. Ropes, anchor blocks and debris have been left as a marine safety hazard rendering this productive scallop ground unfishable. (Application refers to their operations in Bantry Bay. Directors of Bantry Bay Mussels Ltd are also Directors of Dunmanus Bay Mussels Ltd.)

Fishing between lines as suggested by applicant is not possible in deep rough water, with change of wind and tide which could lead to loss of fishing gear or serious accident

The following pictures were taken November 19th 2017 and show fishing boats within the proposed site clearly visible from various places along our section of the Wild Atlantic Way.

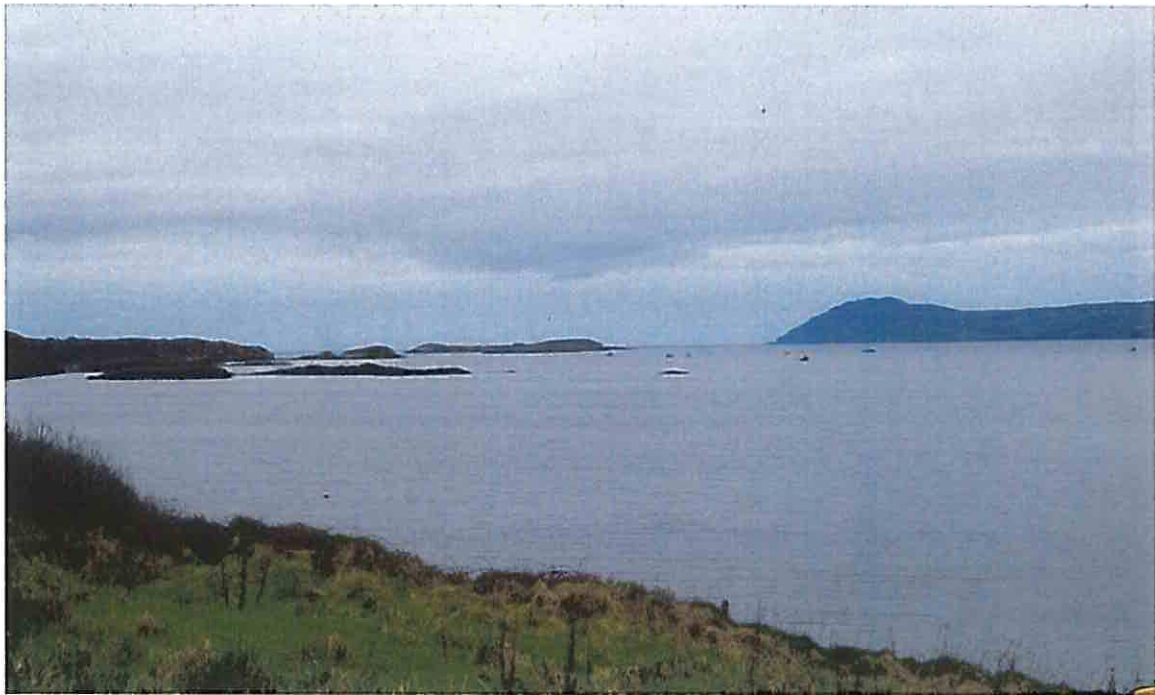


The Wild Atlantic Way runs down both sides of Dunmanus Bay, an environmentally sensitive area of unspoiled scenic beauty. We have complied with the tourism directive to cut ditches and improve views of the sea wherever possible. Any new aquaculture development would be clearly visible from long sections of our Wild Atlantic Way and detrimental to it.

Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org



Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org



The Luxury Holiday homes and Stud Farm overlooking the proposed site bring celebrity tourism to the region. These high-end rental properties are at capacity during the warmer months and with business increasing annually for the cooler months. More aquaculture in the Bay would destroy this business, which employs up to 15 people.



Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org



Kiltomane is a public pier used by fishing boats and pleasure craft, adjoining a beautiful and popular swimming strand packed with tourists and locals during the warmer months and more occasional use in the cooler months. This public amenity should never be spoiled by any installation, least of all a mussel farm, a navigational hazard for fishing boats and pleasure craft of all sizes.

Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org



Fin Whale, second largest mammal on earth, 4 1/2 miles inside Dunmanus Bay looking North to Dooneen Pier, taken November 16th 2016. An Affirmation of our pristine marine environment that we wish to preserve.

To underwrite more environmental damage to wildstock fisheries and endanger our lucrative tourist industry for the sake of 1 or 2 part time jobs on a mussel farm makes no sense to any of us. Please deny this application.

Dunmanus Bay Marine Association

Dunmanus Bay

The Hidden Jewel of SW Ireland

<http://www.savedunmanusbay.org>

Att04

**Second Submissions of Dunmanus
Bay Marine Association**

Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org

Dear Minister

We represent the following organisations: The Association of Dunmanus Bay Fishermen, Fishermen's Inshore Saltwater Heritage Ltd, Goleen Community Council, Ahakista Community Association, Kilcrohane Development Association, Muintir Bhaire Community Council, The Sheep's Head Way, Mizen Head Tourism Co operative Society Ltd and Barley Cove SAC, and attached signatures from landowners and residents on both sides of Dunmanus Bay and those on this petition which continues to gather signatures.

We object to the new planning applications ref T05/590A, for aquaculture and foreshore licenses for an intensive mussel farm in Dunmanus Bay, outside Kiltomane Pier and directly across from Ahakista. These applications are a repeat of similar applications T05/590 for the same location, denied 5 years ago. The revised applications, engineer's report and photos are date stamped 2013/14 and thus out of date and largely invalid.

Despite the offhand reference to "fishermen ad hoc" in the application, the area is a highly productive, sustainably managed, year round fishing ground, targeting different species as they come in and out of season. 12 fishing boats from both sides of the Bay congregated there on a November day to protect their ground, which has supported fishermen and their families for generations, back into the mists of time and hopefully will continue for generations into the future.

When the Fisheries (Amendment) Act 1997 was passed and licenses were being sought for unlicensed mussel farms, the Dunmanus Bay Fishermen decided not to protest mussel installations already in situ. In effect the fishermen gifted without rancour, a portion of their livelihood to the mussel farmers and said goodbye to what had been productive sheltered fishing ground for small boats. Now after 20 years of intensive mussel culture, this area is environmentally destroyed, the ground under and around the lines and the foreshore deep with detritus and discarded mussel socks.

Evidence of the applicant's failure in best practice is to be found at their abandoned mussel farm installation at Gouladoo in Bantry Bay. Ropes, anchor blocks and debris have been left as a marine safety hazard rendering this productive scallop ground unfishable. (Application refers to their operations in Bantry Bay. Directors of Bantry Bay Mussels Ltd are also Directors of Dunmanus Bay Mussels Ltd.)

Fishing between lines as suggested by applicant is not possible in deep rough water, where change of wind and tide could lead to loss of fishing gear or serious accident.

The Wild Atlantic Way runs down both sides of Dunmanus Bay, an environmentally sensitive area of unspoiled scenic beauty. We have complied with the tourism directive to cut ditches and improve views of the sea wherever possible. Any new aquaculture development would be clearly visible from long sections of our Wild Atlantic Way and detrimental to it.

Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org

The Luxury Holiday homes and Stud Farm overlooking the proposed site bring celebrity tourism to the region. These high-end rental properties are at capacity during the warmer months and with business increasing annually for the cooler months. More aquaculture in the Bay would destroy this business, which employs up to 15 people.

Kiltomane is a public pier used by fishing boats and pleasure craft, adjoining a beautiful and popular swimming strand packed with tourists and locals during the warmer months and more occasional use in the cooler months. This public amenity should never be spoiled by any installation, least of all a mussel farm, a navigational hazard for fishing boats and pleasure craft of all sizes.

A Fin Whale, second largest mammal on earth, was photographed 4 1/2 miles inside Dunmanus Bay looking North to Dooneen Pier, taken November 16th 2016. An Affirmation of our pristine marine environment that we wish to preserve.

To underwrite any more environmental damage to wildstock fisheries and endanger our lucrative tourist industry for the sake of 1 or 2 part time jobs on a mussel farm makes no sense to any of us. Please deny this application.

Dunmanus Bay Marine Association
Dunmanus Bay
The Hidden Jewel of SW Ireland
<http://www.savedunmanusbay.org>

Dunmanus Bay Marine Association

Dunmanus, West Cork.

Email savedunmanusbay@gmail.com Website www.savedunmanusbay.org

Att05
Tide Tables



Your EasyTide Prediction (free)

[View printer friendly prediction](#)

Ballycrovane Harbour, Ireland

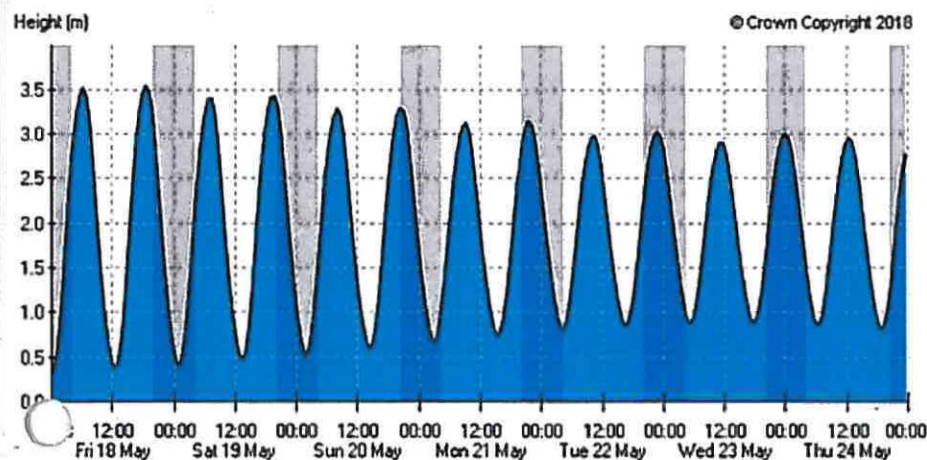
Port predictions (Standard Local Time) are equal to UTC

Start Date: Today - Friday 18th May 2018 (Standard Local Time)

Duration: 7 days



Tidal prediction chart



Note: the date shown underneath 12:00 on any given day is applicable to the previous and next periods of 12 hours

Fri 18 May				Sat 19 May				Sun 20 May			
LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW	HW
00:01	06:12	12:27	18:36	00:54	07:06	13:20	19:29	01:51	08:02	14:18	20:28
0.3 m	3.5 m	0.4 m	3.5 m	0.4 m	3.4 m	0.5 m	3.4 m	0.5 m	3.3 m	0.6 m	3.3 m

Mon 21 May				Tue 22 May				Wed 23 May				Thu 24 May		
LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW
02:52	09:05	15:21	21:35	04:01	10:14	16:29	22:46	05:06	11:19	17:35	23:53	06:14	12:24	18:41
0.7 m	3.1 m	0.7 m	3.1 m	0.8 m	3.0 m	0.8 m	3.0 m	0.9 m	2.9 m	0.9 m	3.0 m	0.9 m	3.0 m	0.8 m

Predicted heights are in metres above Chart Datum

Adjust chart time axis

Daylight saving:

Max graph size:

Apply

Daylight Saving Warning

EasyTide predictions are based on the standard time of the country concerned. For the UK this is GMT (which is in force from 02:00 am on the last Sunday in October until 01:00am on the last Sunday in March). The specific dates of the Sundays in October and March for the next three years can be found on the directgov website at <http://www.direct.gov.uk/en/index.htm>.

The "Daylight saving" drop-down box in the top right-hand corner of the screen can be used to convert the predicted times to "Daylight Saving Time". In the UK this is known as British Summer Time (BST) and is one hour later than GMT. Therefore BST applies to dates and times outside those mentioned above.



Your EasyTide Prediction (free)

[View printer friendly prediction](#)

Dunbeacon Harbour, Ireland

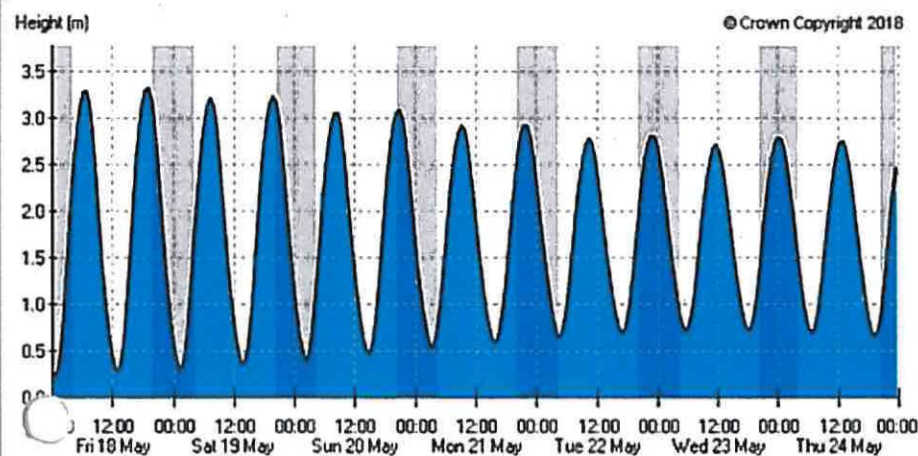
Port predictions (Standard Local Time) are equal to UTC

Start Date: Today - Friday 18th May 2018 (Standard Local Time)

Duration: 7 days



Tidal prediction chart



Note: the date shown underneath 12:00 on any given day is applicable to the previous and next periods of 12 hours

Fri 18 May				Sat 19 May				Sun 20 May			
LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW	HW
00:27	06:28	12:52	18:51	01:19	07:21	13:44	19:44	02:15	08:16	14:41	20:41
0.2 m	3.3 m	0.3 m	3.3 m	0.3 m	3.2 m	0.4 m	3.2 m	0.4 m	3.1 m	0.5 m	3.1 m

Mon 21 May				Tue 22 May				Wed 23 May			Thu 24 May			
LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW	HW	LW
03:15	09:17	15:43	21:47	04:22	10:25	16:50	22:57	05:29	11:31	17:58	00:07	06:38	12:38	19:06
0.5 m	2.9 m	0.6 m	2.9 m	0.6 m	2.8 m	0.7 m	2.8 m	0.7 m	2.7 m	0.7 m	2.6 m	0.7 m	2.6 m	0.7 m

Predicted heights are in metres above Chart Datum

Adjust chart time axis

Daylight saving: 0 hours

Max graph size: 7 days

Apply

Daylight Saving Warning

EasyTide predictions are based on the standard time of the country concerned. For the UK this is GMT (which is in force from 02:00 am on the last Sunday in October until 01:00am on the last Sunday in March). The specific dates of the Sundays in October and March for the next three years can be found on the directgov website at: <http://www.direct.gov.uk/en/index.htm>.

The "Daylight saving" drop-down box in the top right-hand corner of the screen can be used to convert the predicted times to "Daylight Saving Time". In the UK this is known as British Summer Time (BST) and is one hour later than GMT. Therefore BST applies to dates and times outside those mentioned above.