

An Bord Achomharc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board



Submission from DAFM dated 27 April 2018

Cúirt Choill Mhinsí, Bóthar Bhaile Átha Cliath, Port Laoise, Contae Laoise, R32 DTW5
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OHara, Mary

From: Hodnett, Kevin
Sent: 27 April 2018 12:45
To: Mary Ohara (Alab)
Cc: Quinlan, John; Reilly Eimear
Subject: Shot Head and Section 46(1)(a) request. Your Ref: AP2/1-14/2015

Dear Mary,

I refer to your letter dated 10th April to the Minister (and copied to John Quinlan) which was referred to me for attention.

Your letter of 10th April advises that:

“In accordance with the provisions of section 46(1)(a) of the Act, the ALAB Board **HEREBY REQUIRE** you to make any submissions or observations you have in relation to matters referred to in the attached Reports, Notice and response”

The following is a summary of the documents referred to in your letter:

1. A report dated 24th November 2017 assessing potential impact on otters.
2. A report dated 1st February 2018 assessing potential impact on seals.
3. A report dated 5th February 2018 assessing potential impact on Wild Birds.
4. Copy of Section 47 Notice dated 27th February 2018 to the Marine Institute.
5. Copy of Marine Institute response to the Aquaculture Licences Appeals Board dated 28th March 2018.

The Marine Institute are as you are aware, the scientific advisors to this Department in relation to marine matters and I have consulted with the Institute in relation to the matters referred to by you. I am advised as follows:

1. Report dated November 24th November 2017 assessing potential impact on otters.

“This report summarizes habitat and diet preferences of the European otter, what is recognized from the literature in regards to the species sensitivity to pressures—including human disturbance and interactions with fish farms, and population associations with wild salmonid abundance in otter habitats. The purpose of the report was to consider whether the licensed Shot Head salmon farm might adversely affect the otter populations within the Glengarrif and Woodland SAC—the closest SAC to Shot Head. The report concludes the species is a diet generalist/opportunist whose numbers have not been affected by recognized declines in wild Atlantic salmon numbers, and whose status in Ireland is currently listed in the ‘Favorable’ status. It finds that the operation of the salmon farm at Shot Head would be highly unlikely to negatively impact the otter, and as such, it does not support the contention that a supplemental field survey is warranted. We would concur with the conclusions of this report in regards to the interactions of the Shot Head farm and its potential effects on the European otter and the specific population within the Glengarrif and Woodland SAC”.

2. Report dated 1st February 2018 assessing potential impact on seals.

“This report summarizes population status, habitat and diet preferences, and sources of disturbance to the harbour seal, a protected species in Ireland for which concerns have been raised regarding potential impacts to the Glengarrif and Woodland SAC—the closest SAC to Shot Head. The report notes that population assessments of the seal have been made within Bantry Bay repeatedly since 1985, and that between 1985 and 2005, numbers increased nearly fourfold from 135 to 400. Since this time the report conveys that the population status has been relatively stable, from between around 320 to 350 animals, and the author asserts it is likely at or near pre-exploitation levels. The number of seals using Bantry Bay, and the results of a limited tagging study of two seals in Bantry Bay support the conclusion asserted by the author that

harbour seals will encounter the Shot Head site and may interact with it, as was demonstrated by the association of the tagged seals around the existing Roancarrig salmon farm site. The author notes, "These opportunities may be aggregations of wild fish found around farms (Carss, 1990), or may be direct predation on the farmed stock (Northridge, Coram, and Gordon, 2012)." We would concur with this assertion. The report further summarizes potential sources of disturbance from human activities on harbour seals, particularly on the use of haul-outs, but concludes that the level of activity associated with the farm will not be disproportionate to what currently occurs from recreational activities in the bay to which the seals are likely habituated (e.g., kayaks) and is unlikely to negatively impact them. Again, we would not dispute this conclusion. The report concludes that the population of harbour seals in Bantry Bay appears stable and that the conservation targets for the nearby SAC for harbour seals would not be affected, but acknowledges that the use of seal scarers, if required for nuisance seals, could introduce man-made noise adjacent to the farm site. Given that this man-made noise would not extend to the SAC, we concur with the report's conclusion that the Shot Head farm and its operations would not negatively impact the conservation status of harbour seals at the Glengarriff and Woodland SAC".

3. Report dated 5th February 2018 assessing potential impact on Wild Birds.

The Marine Institute has previously reviewed this report at the direct request of the Aquaculture Licences Appeals Board (request dated 27th February 2018) and provided its detailed response on 28th March 2018. The Marine Institute as scientific advisors to the Department has advised that: "*No additional information has been provided since that time from which our views would be altered*".

This Department has no further observations in relation to this report.

4. Section 47 Notice to Marine Institute dated 27th February 2018.

The issue of a Section 47 Notice to Marine Institute by the Aquaculture Licences Appeals Board (ALAB) is entirely a matter for ALAB.

5. Marine Institute response dated 28th March 2018.

As set out in No 3 above, the Marine Institute as scientific advisors to the Department has advised that: "*No additional information has been provided since that time from which our views would be altered*". This Department has no further observations in relation to this report.

The Department does note however, that the Marine Institute has noted a typographical error in the concluding sentence of its response dated 27th February 2018, in relation to the requirement to "*carry out a full Article 6.3 assessment on the likely interactions with gannet or to assess the importance of the area for other bird populations*." The Marine Institute has advised that it will write directly to the Aquaculture Licences Appeals Board in this regard.

If you require any further information please let me know.

Regards,

Kevin Hodnett.

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