

**An Bord Achomharc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board**



**Submission from Billy Smyth
Galway Bay Against Salmon Cages
received 1 May 2018**

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OHara, Mary

From: Billy Smyth [
Sent: 01 May 2018 13:28
To: Mary Ohara (Alab)
Subject: Submission on Shot Head salmon farm Ref: T05/555

Aquaculture Licences Appeals Board,

Submission by Galway Bay Against Salmon Cages (GBASC) in relation to the reports Assessing Potential Impacts on Wild Birds, Seals and Otters at the proposed Shot Head salmon farm Site Ref: T05/555

GBASC agree with the findings of Ecological Consultant Tom Gittings, that,

"The EIA for the proposed fish farm site contains no assessment of potential impacts on bird populations and does not make any references to the Bull and Cow Rocks SPA. The conclusion that there is "no potential "source pathway-target" vector" connecting the proposed fish farm site and the Beara Peninsula SPA is clearly incorrect, as Fulmar are a SCI of the Beara Peninsula SPA.

Therefore, in the context of the present assessment, the EIA does not provide an adequate assessment of potential impacts on all the SPAs for which there is potential for interaction between their SCIs and the proposed fish farm site. In a wider context, the EIA is also clearly inadequate as it does not consider important non-SPA bird populations which have the potential to interact with the proposed fish farm site.

The EIS and EIA are inadequate, as discussed above. Therefore, further AA screening is required. The present briefing note contains the information required for this screening. However, based on the assessment presented here, a stage 2 Appropriate Assessment of the potential impact of Gannet mortalities on the Gannet SCI of the Bull and the Cow Rocks may be required."

GBASC however, do not agree with the findings of Dr.Graham Saunders conclusions that the proposed fish farm at Shot Head is unlikely to negatively impact the conservation status of the population of harbour seals or Otters in the Glengarriff Harbour and Woodland SAC.

It is hard to believe that " Existing sites in County Cork have been granted permission to shoot four seals since 2007, and have reportedly shot two." There is anecdotal evidence from other salmon farming countries and indeed here in Ireland that salmon farm operators shoot seals on sight, we don't believe it will be any different in Bantry Bay.

Also, there was no mention or study in Dr. Graham Saunders reports about the affects toxic pesticides used to kill sea lice on farmed salmon may have on the seal and Otter populations in Bantry Bay.

We are often told that toxic pesticides will not be used on organic salmon farms but the reality is that sea lice cannot differentiate between organic and non organic farmed salmon and toxic pesticides must be used to kill the sea lice when infestations occur. These toxic pesticides are then taken up by crustaceans such as Shrimp, Prawn, Lobster and Crab, either by eating fish feed that has been dosed with the pesticide so that the fish can be treated orally or by contaminated dead fish and feces under the cages.

It is known that Seals and Otters are opportunist feeders and will eat the above named crustaceans that may have been feeding under or around the salmon cages. As there is no study or mention of the possible affects these toxic pesticides may have on Shrimp, Prawn, Lobster and Crab and subsequently on Seals and Otters that eat them, we believe that Dr. Graham Saunders reports may be flawed and further screening may be required in this regard.

GBSAC are of the opinion that ALAB must refuse the current application and insist that the applicant start afresh and comply with all relevant legislation and current scientific knowledge. Recent court decisions and legal opinion pertaining to the habitats Directive have come to our attention.

Our reading of the situation, given that we have not had a chance to carry out an in depth study leads us to believe that any attempt to proceed with the current application will eventually fail legal challenges.

I refer to case C164/17, in particular.

We have not had sufficient time to study the others in detail.

On behalf of GBASC,

Billy Smyth

Chairman, Galway Bay Against Salmon Cages

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