



AP7-11/2017

Trawbreaga

Section 46 extension request from  
Appellants

dated 16 March 2018



**REF : LICENSE APPEALS:**

TRAWBREAGA BAY CO. DONEGAL

T12/470

T12/426

T12/471

T12/475

T12/434



**AQUACULTURE LICENCES  
APPEALS BOARD  
16 MAR 2018  
RECEIVED**

**Marjorie Doherty**

**14/3/18**

**Dear Mary,**

We are writing to request a 12 week extension to consider the points raised in your letter of the 5<sup>th</sup> March 2018.

We were thankful that the board provided the Engineering report by Mr O'Sullivan but we are very concerned that this was not placed in the public domain at the time of licence determination so that it could have informed our initial appeal.

The report raises a number of issues not previously considered in our appeal and as it was not previously provided to us.

With the greatest respect 21 days is not enough time to appoint a consultant and have them compile a report critiquing Mr O'Sullivan's assertions.

We also note that the Full National Guidelines referred to by Mr O'Sullivan do not appear to be in the public domain (All we can find is an information leaflet – not the full report).

The convention on Access to information, public participation in decision-making and access to justice in environmental matters dictates "that public participation procedures shall include reasonable time-frames for different phases of consultation, allowing sufficient time for informing the public and for the public to prepare and participate effectively during the environmental decision-making."

We feel that a three month period is not an excessive time for this phase of the decision making process and given the current deadline (26<sup>th</sup> March) we would appreciate if you could examine this request and respond to us as a matter of urgency

**Regards**

*Marjorie Doherty*

**Marjorie Doherty**

**James Ball**

**14/3/18**

**Dear Mary,**

We are writing to request a 12 week extension to consider the points raised in your letter of the 5<sup>th</sup> March 2018.

We were thankful that the board provided the Engineering report by Mr O'Sullivan but we are very concerned that this was not placed in the public domain at the time of licence determination so that it could have informed our initial appeal.

The report raises a number of issues not previously considered in our appeal and as it was not previously provided to us.

With the greatest respect 21 days is not enough time to appoint a consultant and have them compile a report critiquing Mr O'Sullivan's assertions.

We also note that the Full National Guidelines referred to by Mr O'Sullivan do not appear to be in the public domain (All we can find is an information leaflet – not the full report).

The convention on Access to information, public participation in decision-making and access to justice in environmental matters dictates "that public participation procedures shall include reasonable time-frames for different phases of consultation, allowing sufficient time for informing the public and for the public to prepare and participate effectively during the environmental decision-making."

We feel that a three month period is not an excessive time for this phase of the decision making process and given the current deadline (26<sup>th</sup> March) we would appreciate if you could examine this request and respond to us as a matter of urgency

Regards

*James Ball*

**James Ball**

**Michael Mc Laughlin**

14/3/18

**Dear Mary,**

We are writing to request a 12 week extension to consider the points raised in your letter of the 5<sup>th</sup> March 2018.

We were thankful that the board provided the Engineering report by Mr O'Sullivan but we are very concerned that this was not placed in the public domain at the time of licence determination so that it could have informed our initial appeal.

The report raises a number of issues not previously considered in our appeal and as it was not previously provided to us.

With the greatest respect 21 days is not enough time to appoint a consultant and have them compile a report critiquing Mr O'Sullivan's assertions.

We also note that the Full National Guidelines referred to by Mr O'Sullivan do not appear to be in the public domain (All we can find is an information leaflet – not the full report).

The convention on Access to information, public participation in decision-making and access to justice in environmental matters dictates "that public participation procedures shall include reasonable time-frames for different phases of consultation, allowing sufficient time for informing the public and for the public to prepare and participate effectively during the environmental decision-making."

We feel that a three month period is not an excessive time for this phase of the decision making process and given the current deadline (26<sup>th</sup> March) we would appreciate if you could examine this request and respond to us as a matter of urgency

**Regards**



**Michael Mc Laughlin**

**Michael and Eunan Mc Laughlin**

14/3/18

**Dear Mary,**

We are writing to request a 12 week extension to consider the points raised in your letter of the 5<sup>th</sup> March 2018.

We were thankful that the board provided the Engineering report by Mr O'Sullivan but we are very concerned that this was not placed in the public domain at the time of licence determination so that it could have informed our initial appeal.

The report raises a number of issues not previously considered in our appeal and as it was not previously provided to us.

With the greatest respect 21 days is not enough time to appoint a consultant and have them compile a report critiquing Mr O'Sullivan's assertions.

We also note that the Full National Guidelines referred to by Mr O'Sullivan do not appear to be in the public domain (All we can find is an information leaflet – not the full report).

The convention on Access to information, public participation in decision-making and access to justice in environmental matters dictates "that public participation procedures shall include reasonable time-frames for different phases of consultation, allowing sufficient time for informing the public and for the public to prepare and participate effectively during the environmental decision-making."

We feel that a three month period is not an excessive time for this phase of the decision making process and given the current deadline (26<sup>th</sup> March) we would appreciate if you could examine this request and respond to us as a matter of urgency

**Regards**



**Michael and Eunan Mc Laughlin**

**Michael Barr**

14/3/18

Dear Mary,

We are writing to request a 12 week extension to consider the points raised in your letter of the 5<sup>th</sup> March 2018.

We were thankful that the board provided the Engineering report by Mr O'Sullivan but we are very concerned that this was not placed in the public domain at the time of licence determination so that it could have informed our initial appeal.

The report raises a number of issues not previously considered in our appeal and as it was not previously provided to us.

With the greatest respect 21 days is not enough time to appoint a consultant and have them compile a report critiquing Mr O'Sullivan's assertions.

We also note that the Full National Guidelines referred to by Mr O'Sullivan do not appear to be in the public domain (All we can find is an information leaflet – not the full report).

The convention on Access to information, public participation in decision-making and access to justice in environmental matters dictates "that public participation procedures shall include reasonable time-frames for different phases of consultation, allowing sufficient time for informing the public and for the public to prepare and participate effectively during the environmental decision-making."

We feel that a three month period is not an excessive time for this phase of the decision making process and given the current deadline (26<sup>th</sup> March) we would appreciate if you could examine this request and respond to us as a matter of urgency

Regards



**Michael Barr**