

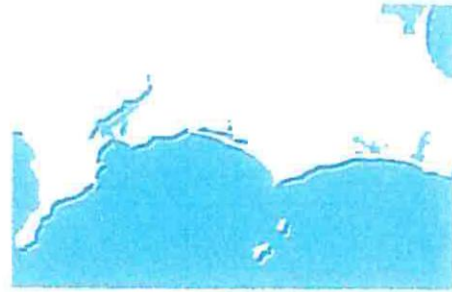
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The South Wexford Coast: SWC a natural heritage coastline

8 May 2018

The Minister,
Department of Agriculture, Food and the Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre,
Clonakilty,
Co Cork.

Refs: (1) T03/86A, T03/86B and T03/86C.
(2) T03/87A.
(3) T03/88A, T03/88B and T03/88C.
(4) T03/96A and
(5) T03/97A and T03/98.

Dear Minister,

This is a submission in relation to the applications for Aquaculture Licences and Foreshore Licences relevant to (1) the area reference numbers listed above at Bannow Bay, Co Wexford, (2) the public notices published in the *Wexford People* newspaper, issue dated 24 April 2018, page 105 and (3) applications No 5, 6, 7, 8 and 9 posted on your webpage at

<http://agriculture.gov.ie/seafood/aquacultureforeshoremanagement/aquaculturelicensing/aquacultureforeshorelicenceapplications/wexford/>.

I make the following points for your consideration.

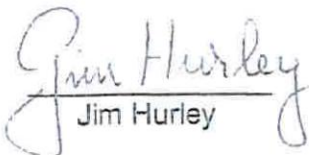
1. While Bannow Bay is a protected area for its biodiversity, it is self-evident that the spread of shellfish aquaculture there is reducing the available area of habitat 1140 'Mudflats and sandflats not covered by seawater at low tide' and is turning part of the bay into an actively farmed zone with consequent ongoing disturbance.
2. The National Parks and Wildlife Service (NPWS), one of the technical services of the Heritage Division of the Department of Culture, Heritage and the Gaeltacht, is the competent authority in Ireland for nature conservation, has responsibility for the protection and conservation of Ireland's natural heritage and biodiversity at national government level, and manages the protected wildlife areas at Bannow Bay.
3. In the 2014 version of the Site Synopsis for the Bannow Bay candidate Special Area of Conservation (cSAC IE000697), the NPWS estimates that the intertidal area under shellfish cultivation in 2013 was "approximately 20 ha" and that "Any further increase in aquaculture poses a threat [to the sustainable conservation of the site]." (Source: <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY000697.pdf>; last paragraph, page 3).

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4. No licences for shellfish aquaculture at Bannow Bay were issued in the period 2006-2017 suggesting that the maximum area under cultivation, and the threshold for posing a threat to the sustainable conservation of the site as outlined above, currently remains an area of approximately 20ha.
5. On 13 March 2018, public notice was given in the local press that the licences for 13 areas comprising approximately 52ha had been granted (areas T03/25A, T03/25B and T03/25/1, T03/31 A and B and T03/31/1, T03/32 A and B and T03/32/1A and T03/41 A and B and T03/41/1 A and B). That combined area (52ha) is more than double the area that is regarded as acceptable (20ha).
6. The newly-licenced area of approximately 52ha comprised approximately 20ha of renewal licences (areas T03/25A, T03/25B, T03/31A, T03/31B, T03/32A, T03/32B, T03/41A and T03/41B) and approximately 32ha of trial licences (areas T03/25/1A, T03/31/1A, T03/32/1A, T03/41/1A and T03/41/1B). My letter to you dated 23 November 2017 favoured the granting of the 20ha of renewal licences to the four shellfish farmers formerly licenced to operate in the bay on grounds of precedence but was opposed to the granting of licences for an additional 32ha area of trials in line with the NPWS management policy for the area as outlined at Point No 3 above. (I trust you received that letter (copy attached) as I have no record of it being either acknowledged or replied to.)
7. The present 10 applications cover an additional area of approximately 65ha (areas T03/86A, T03/86B and T03/86C, T03/87A, T03/88A, T03/88B and T03/88C, T03/96A, T03/97A and T03/98). That combined area is more than three times the area that is regarded as acceptable (20ha) and, if granted, would bring the area under cultivation to approximately 117ha, almost six times the area that is regarded as acceptable by the NPWS.
8. None of the aforementioned shellfish sites is in the area designated for aquaculture (<http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/Environment/Water/FileDownload%2C19482%2Cen.pdf>). The area designated for aquaculture is completely free of shellfish farms.
9. To date, shellfish farmers at Bannow Bay have been local people living in the area. The application to farm 20.8ha by AG Oyster Ltd with an address in France and a company office in the International Financial Services Centre in Dublin is a marked departure from practice to date in terms of the proposed scale of operation.

I trust this submission and the above points will receive due consideration and that the five current applications for licences will be refused so as not to prejudice the long-term conservation of the biodiversity of Bannow Bay.

Yours sincerely,


Jim Hurley