

McCarthy Ann

---

**From:** Natural Environment [naturalenvironment@antaisce.org]  
**Sent:** 24 May 2018 10:45  
**To:** McCarthy Ann  
**Subject:** Re: Aquaculture Licence applications in Bannow Bay  
**Attachments:** T03-86, T03-87, T03-88, T03-96, T03-97, T03-98.pdf

Dear Ann

Please find attached the submission from An Taisce with regard to the aquaculture applications T03/86, T03/87, T03/88, T03/96, T03/97 and T03/98.

Kind regards,

Annie Allen

On Fri, Apr 13, 2018 at 12:27 PM, McCarthy Ann <[Ann.McCarthy@agriculture.gov.ie](mailto:Ann.McCarthy@agriculture.gov.ie)> wrote:

Please see attached correspondence in relation to aquaculture licence applications in Bannow Bay.

Ann McCarthy  
Aquaculture and Foreshore Management Division  
Department of Agriculture Food and the Marine  
National Seafood Centre  
Clonakilty  
Co Cork  
P85 TX47

Email: [ann.mccarthy@agriculture.gov.ie](mailto:ann.mccarthy@agriculture.gov.ie)

Phone No; (023)8859537

Fax (023)8821782

-----Original Message-----

**From:** [ann.mccarthy@agriculture.gov.ie](mailto:ann.mccarthy@agriculture.gov.ie) [mailto:[ann.mccarthy@agriculture.gov.ie](mailto:ann.mccarthy@agriculture.gov.ie)]  
**Sent:** 13 April 2018 11:09  
**To:** McCarthy Ann  
**Subject:** Letter to Consultees

Please open the attached document. It was scanned and sent to you using a Xerox Multifunction Printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location: Clonakilty LO, Ground Floor (Marine)

Device Name: C-CL-GF-X7855-MFD3

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

Disclaimer:

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

[24/05/2018]

**Submission pursuant to the provisions of Article 5 (2) of Directive 2011/92/EU**

To Whom It May Concern:

Thank you for referring this notification to An Taisce in accordance with Section 10 of the Aquaculture (Licence Application) Regulations, 1998 (SI No 236 of 1998).

An Taisce has reviewed the six new licence applications for aquaculture development in Bannow Bay, T03/86, T03/87, T03/88, T03/96, T03/97 and T03/98 and would like to make the following submission in relation to this application.

The proposed aquaculture project lies within the Bannow Bay SAC (000697), which is a relatively large estuarine site, approximately 14 km long, on the south coast of Co. Wexford. The Bay is designated as a Special Area of Conservation (SAC), with designated marine habitats: Estuaries (1130) and Mudflats and sand flats not covered by seawater at low tide (1140) each of which support soft sedimentary communities and community complexes. The site also contains, and is designated for, a range of coastal habitats including salt meadow, sand dunes and scrub. The proposed project also lies with the Bannow Bay SPA (004033) designated under the E.U. Birds Directive of special conservation interest for the following species: Light-bellied Brent Goose, Shelduck, Pintail, Oystercatcher, Golden Plover, Grey Plover, Lapwing, Knot, Dunlin, Blacktailed Godwit, Bar-tailed Godwit, Curlew and Redshank. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

**New Licences**

The findings of the Appropriate Assessment conclude that:

*'Renewal of existing licences would appear to have acceptable disturbance impact levels on bird conservation features (see Table 4.4 of the Atkins report)*

*- Licensing of renewals and those previously considered trial licences, would potentially exceed the threshold of 5% displacement for a number of bird species including Grey Plover, Bar-tailed Godwit, Black-tailed Godwit, Dunlin and Knot (see table 4.4 of Atkins Report). The maximum likely disturbance calculated, under this scenario, was 7.9% for Knot*

- *The licensing of all sites in the bay, both existing activity and new areas, would potentially result in significantly high levels of disturbance, exceeding the 10% threshold for 5 shorebird species (see table 4.4 of Atkins Report)*'

And on page 10 of the AA Conclusion Report they outline:

*'On the basis of the Appropriate Assessment findings it is not proposed to licence any new aquaculture activity in Bannow Bay as there are no clear mitigation measures available to prevent the risk of the deterioration of the conservation status of the referenced shorebirds.'*

An Taisce have reviewed the documentation provided, and would welcome this decision by the licensing authority. On reviewing the documentation provided, we would submit, in agreement with the AA report conclusions, that levels of aquaculture in the Bay cannot be increased, as there are no clear mitigation measures available to prevent the risk of the deterioration of the conservation status of the referenced shorebirds. Thus, the granting of new licences would be in contravention of Article 6 (3) of the Habitats Directive.

Given that licence application numbers T03/86, T03/87, T03/88, T03/96, T03/97 and T03/98 are all new licence applications, and thus licensing will not proceed, we have no further comment on these applications.

Is mise le meas.



Elaine McGoff,  
Natural Environment Office,  
An Taisce – The National Trust for Ireland

## References

NPWS (2012) Conservation Objectives: Bannow Bay SPA 004033. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

US EPA (2010) Nutrients in Estuaries A Summary Report of the National Estuarine Experts Workgroup 2005–2007

EPA (2010). Water Quality Survey of Irish Estuaries and Coastal Waters for 2007-2009

EPA (2017) Urban Waste Water Treatment in 2016

Dept of Housing, Planning and Local Government (2012) Bannow Bay PRP 2012 - Updated