



Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2; Charity Registration No. CHY6264

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

[26/10/2021]

Re: Submission on oyster aquaculture licences in Trawbreaga Bay SPA / North Inishowen Coast SAC

To Whom It May Concern,

The Irish Wildlife Trust would like to make the following submission in relation to licences T12/554A, T12/555A, T12/557A, T12/558A, T12/560A, T12/561A, T12/562A, T12/563A, T12/566A, T12/568A, T12/570A, T12/571A, T12/572A and T12/573A.

The proposed sites are located within Trawbreaga Bay, which is designated as a Special Protection Area for Barnacle Goose (*Branta leucopsis*), Light-bellied Brent Goose (*Branta bernicla hrota*), Chough (*Pyrrhocorax pyrrhocorax*) and Wetland and Waterbirds as well as a Special Area of Conservation for the habitats / species Mudflats and sandflats not covered by seawater at low tide, Perennial vegetation of stony banks, Vegetated sea cliffs of the Atlantic and Baltic coasts, Fixed coastal dunes with herbaceous vegetation (grey dunes), Machairs, European dry heaths, *Vertigo angustior* (Narrow-mouthed Whorl Snail) and *Lutra lutra* (Otter).

The Appropriate Assessment (AA) report for the SPA¹ rightly points out the many negative impacts, as well as uncertainty around oyster aquaculture regarding the conservation objectives of Light-bellied Brent Geese. The population of this species has declined in Trawbreaga Bay, which suggests that even current levels of aquaculture in the bay are having a negative impact. **We therefore support the AA's conclusion that the proposed aquaculture licences should not be granted.** We also urge the licencing

¹ Appropriate Assessment of Aquaculture, Trawbreaga Bay SPA, Marine Institute, 06/08/2021



authority to review the current applications thoroughly when the time for licencing renewal comes.

Furthermore, we support the recommendation that further research and monitoring and an investigation of carrying capacity of Trawbreaga Bay is needed in order to reach well-informed conclusions regarding the impact of oyster trestle aquaculture on sedimentary habitats.

15% disturbance threshold

The AA report for the SAC² is based on a 15% disturbance threshold which is derived from NPWS guidance. The policy from the NPWS was loosely based on an EU guidelines document (which is not legally binding) on applying thresholds to describe the conservation status of habitats. The 15% threshold used by the NPWS is not mentioned in the EU guidelines and it is our view that the NPWS has misinterpreted the guidance. The application of the 15% policy has previously led to licencing of aquaculture and fisheries in SACs and has directly led to habitat deterioration (e.g. Roaringwater Bay)³.

While the licencing authority in this case recommends that the licences should not be granted, we still object to the use of the 15% disturbance threshold in the AA. It is not in line with the Habitats Directive Article 6 (2) requirement to avoid the deterioration of natural habitats and the habitats of species.

The Irish Wildlife Trust reserves the right to expand on the arguments against granting these licences should they proceed to be licenced despite the recommendation in the AA conclusion statement.

Yours sincerely,

Regina Classen
Project Officer Marine Protected Areas, Irish Wildlife Trust

² Report Supporting Appropriate Assessment of Aquaculture in the North Inishowen Coast SAC (Site code: 002012) Marine Institute, Version: August 2021

³ Classen, R (2020). Marine Protected Areas – Restoring Ireland’s Ocean Wildlife II. Report on Ireland’s Failure to Protect Marine Natura 2000 Sites. Irish Wildlife Trust.