

Addendum to Screening Statement for Appropriate Assessment Hand Harvesting of Seaweed at Easkey Strand, Co. Sligo.

Produced by

AQUAFACT – APEM Group

On behalf of Celtic Seaweed Bath Products Ltd. and Celtic Seabaths Ltd.

November 2024

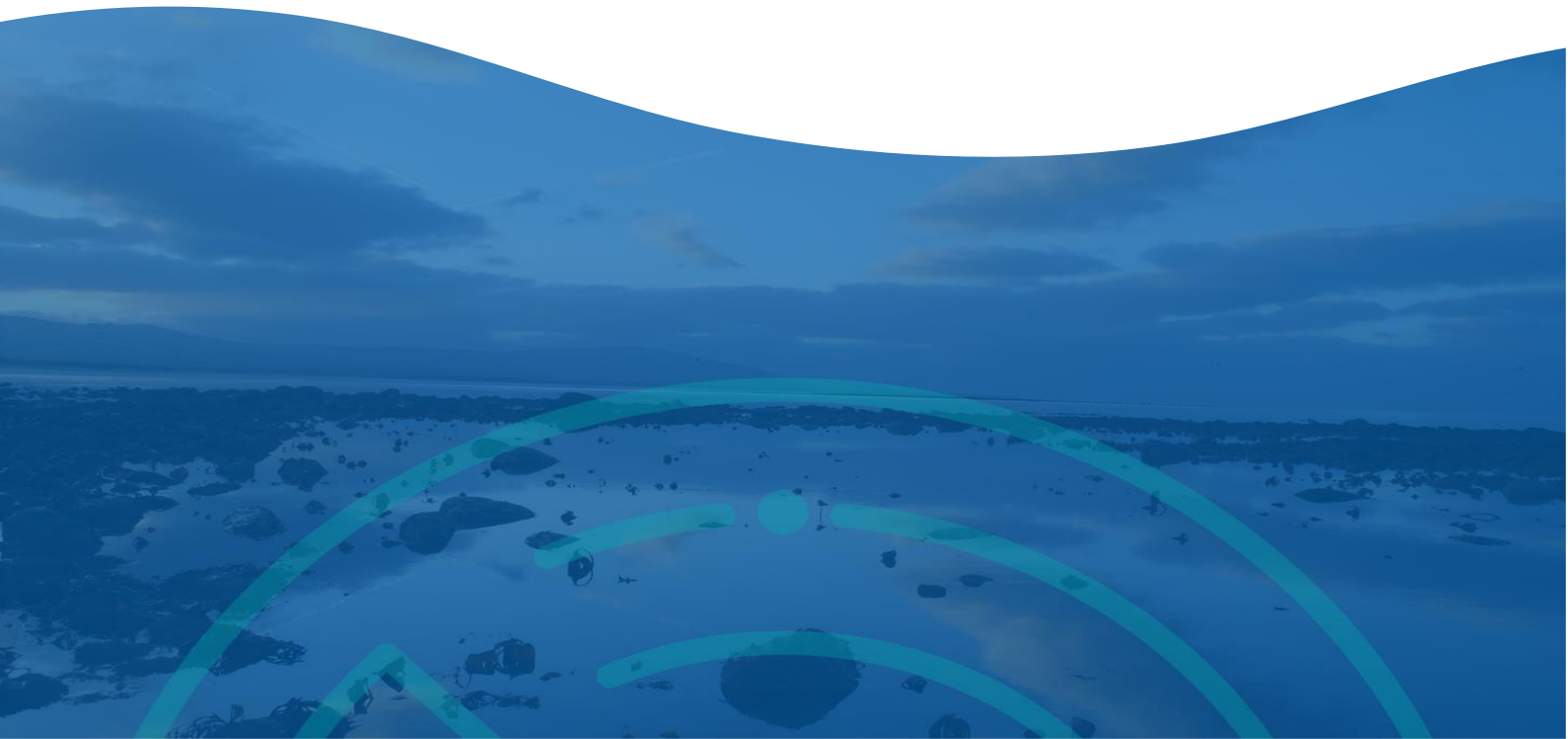


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1. Introduction

1.1. Overview

This Addendum to a Screening for Appropriate Assessment (AA) produced in September 2021 has been prepared by AQUAFACT - APEM Group (AQUAFACT) to review the validity of the original conclusion considering two significant changes to European sites in Ireland since the original report was composed.

The following are the updates to European sites in Ireland:

- Two new SPAs, the North-west Irish Sea Special Protection Area (SPA) and the Seas off Wexford SPA were approved in July 2023 and January 2024, respectively.
- Harbour porpoise (*Phocoena Phocoena*) and bottlenose dolphins (*Tursiops truncatus*) have recently been added as Qualifying Interests(QIs) to 16 existing marine and coastal Special Areas of Conservation (SAC).

This has been done by using the Source-Pathway-Receptor method (OPR, 2021) to assess if the project alone or in combination will have a significant effect to any new conservation features or their objectives as a result of these new designations.

1.2. Guidance/Legislation

This Addendum report has been prepared in accordance with the following guidance:

- European Commission (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC Commission notice.
- Office of Planning Regulator (2021) Practice Note PN01 Appropriate Assessment screening for development management.
- Department of Environment, Housing and Local Government (2009) Appropriate Assessment of plans and projects in Ireland guidance for planning authorities (Revised 2010).
- European Commission (2021) Assessment of plans and projects in relation to Natura 2000 sites – methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC Commission notice.
- Habitats Directive (Council Directive 92/43/EEC) 1992.
- Birds Directive (Directive 79/409/EEC) 1979, amended Directive 2009/147/EC.
- European Communities (Birds and Natural Habitats) Regulations 2011-2021
- Department of Arts, Heritage and the Gaeltacht – National Parks and Wildlife Service (DAHG - NPWS) (2012) Marine Natura Impact Statements in Ireland Special Areas of Conservation, a working document.
- CIEEM, 2018 (Updated in 2022). Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine.

1.3. Statement of Authority

This Screening for Appropriate Assessment Addendum has been prepared by Aisling Hearty (MSc, ACIEEM) of AQUAFAC (APEM Group). Aisling is a senior ecologist with over 5 years of experience in consultancy and ecology. Aisling is experienced in taxonomic identification of major benthic macroinvertebrate groups. Aisling also has a wide range of experience in ecological survey techniques and methodologies including grab sampling, freshwater kick sampling, intertidal sampling and drop-down video deployment and analysis and she is GWO and BOSIET certified. Aisling has a JNCC certification as a Marine Mammal Observer and has carried out both desk and field-based assessments regarding Marine Mammals in Ireland. Aisling has a wide range of experience in the preparation of Appropriate Assessment Screening reports, Natura Impact Statements, Ecological Impact Assessments and Environmental Impact Assessment Reports. Aisling's project history includes working on aquaculture licencing, renewable energy projects (solar farms and onshore and offshore wind) and water quality projects.

2. Assessment of New Designations

2.1. Potential Impact Mechanisms

The original potential impact mechanisms (or sources of impact) identified from the project are:

- Disturbance to habitat and associated species
- Removal of target and non-target species
- Uncovering of previously hidden fauna
- Trampling (during access and harvesting)
- Reduction in dampening effect

2.2. Review of European sites in the zone of influence

2.2.1. Special Areas of Conservation

After the addition of Harbour porpoise and Bottlenose dolphin as QIs to 16 existing SACs around Ireland, the total number of SACs that have harbour porpoise as a QI is now 16 and bottlenose dolphin as a QI is now 10.

The closest SACs to the site that have either listed as a QI are:

- Bunduff Lough and Machair/Trawalua/Mullaghmore SAC (000625) *ca.* 35 km from site
 - *Phocoena phocoena* (Harbour Porpoise)
- St. John's Point SAC (000191) *ca.* 43 km from site
 - *Tursiops truncatus* (Common Bottlenose Dolphin)
- West Connacht Coast SAC (002998) *ca.* 66 km from site

- *Phocoena phocoena* (Harbour Porpoise)
- *Tursiops truncatus* (Common Bottlenose Dolphin)

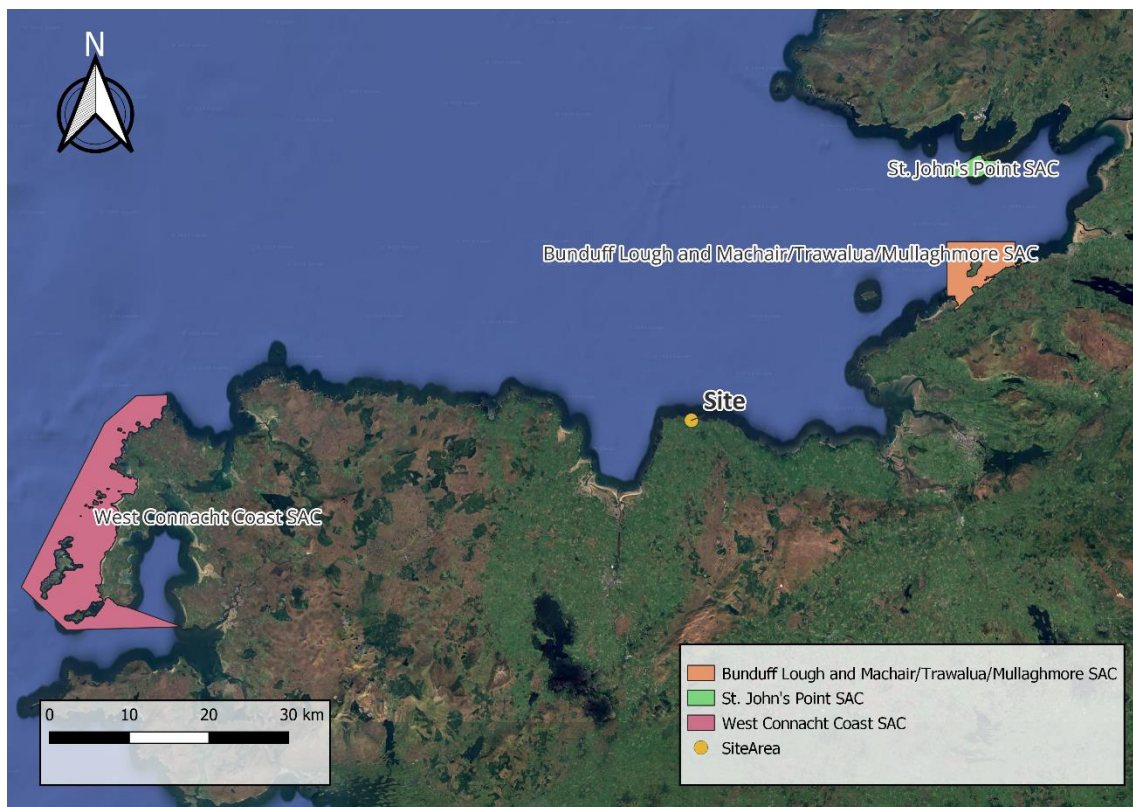


Figure 2-1: SACs with updated QIs closest to the project site.

Upon review of the potential impact mechanisms and the newly designated QIs, the SPR pathway determined that there is no connectivity given the nature of the hand harvesting works. As the work will be carried out close to the shore and that the hand harvesting activities will not have a long-term significant effect on the ecology of the harvest areas there will be no interaction with the QI species listed either directly or indirectly and therefore these QIs can be screened out.

2.2.2. Special Protection Areas

Since the production of the original Screening for Appropriate Assessment report in 2021, two new SPAs, the North-west Irish Sea Special Protection Area (SPA) and the Seas off Wexford SPA were approved in July 2023 and January 2024, respectively.

The North-west Irish Sea SPA is located *ca.* 187 km from the project site and has the following bird species listed as Special Conservation Interests (SCIs):

- Red-throated Diver (*Gavia stellata*) [A001]
- Great Northern Diver (*Gavia immer*) [A003]
- Fulmar (*Fulmarus glacialis*) [A009]
- Manx Shearwater (*Puffinus puffinus*) [A013]
- Cormorant (*Phalacrocorax carbo*) [A017]
- Shag (*Phalacrocorax aristotelis*) [A018]
- Common Scoter (*Melanitta nigra*) [A065]
- Little Gull (*Larus minutus*) [A177]
- Black-headed Gull (*Chroicocephalus ridibundus*) [A179]
- Common Gull (*Larus canus*) [A182]
- Lesser Black-backed Gull (*Larus fuscus*) [A183]
- Herring Gull (*Larus argentatus*) [A184]
- Great Black-backed Gull (*Larus marinus*) [A187]
- Kittiwake (*Rissa tridactyla*) [A188]
- Roseate Tern (*Sterna dougallii*) [A192]
- Common Tern (*Sterna hirundo*) [A193]
- Arctic Tern (*Sterna paradisaea*) [A194]
- Little Tern (*Sterna albifrons*) [A195]
- Guillemot (*Uria aalge*) [A199]
- Razorbill (*Alca torda*) [A200]
- Puffin (*Fratercula arctica*) [A204]

The Seas off Wexford SPA is located *ca.* 271 km from the project site and has the following bird species listed as Special Conservation Interests (SCIs):

- Red-throated Diver (*Gavia stellata*) [A001]
- Fulmar (*Fulmarus glacialis*) [A009]
- Manx Shearwater (*Puffinus puffinus*) [A013]
- Gannet (*Morus bassanus*) [A016]
- Cormorant (*Phalacrocorax carbo*) [A017]
- Shag (*Phalacrocorax aristotelis*) [A018]

- Common Scoter (*Melanitta nigra*) [A065]
- Mediterranean Gull (*Larus melanocephalus*) [A176]
- Black-headed Gull (*Chroicocephalus ridibundus*) [A179]
- Lesser Black-backed Gull (*Larus fuscus*) [A183]
- Herring Gull (*Larus argentatus*) [A184]
- Kittiwake (*Rissa tridactyla*) [A188]
- Sandwich Tern (*Sterna sandvicensis*) [A191]
- Roseate Tern (*Sterna dougallii*) [A192]
- Common Tern (*Sterna hirundo*) [A193]
- Arctic Tern (*Sterna paradisaea*) [A194]
- Little Tern (*Sterna albifrons*) [A195]
- Guillemot (*Uria aalge*) [A199]
- Razorbill (*Alca torda*) [A200]
- Puffin (*Fratercula arctica*) [A204]

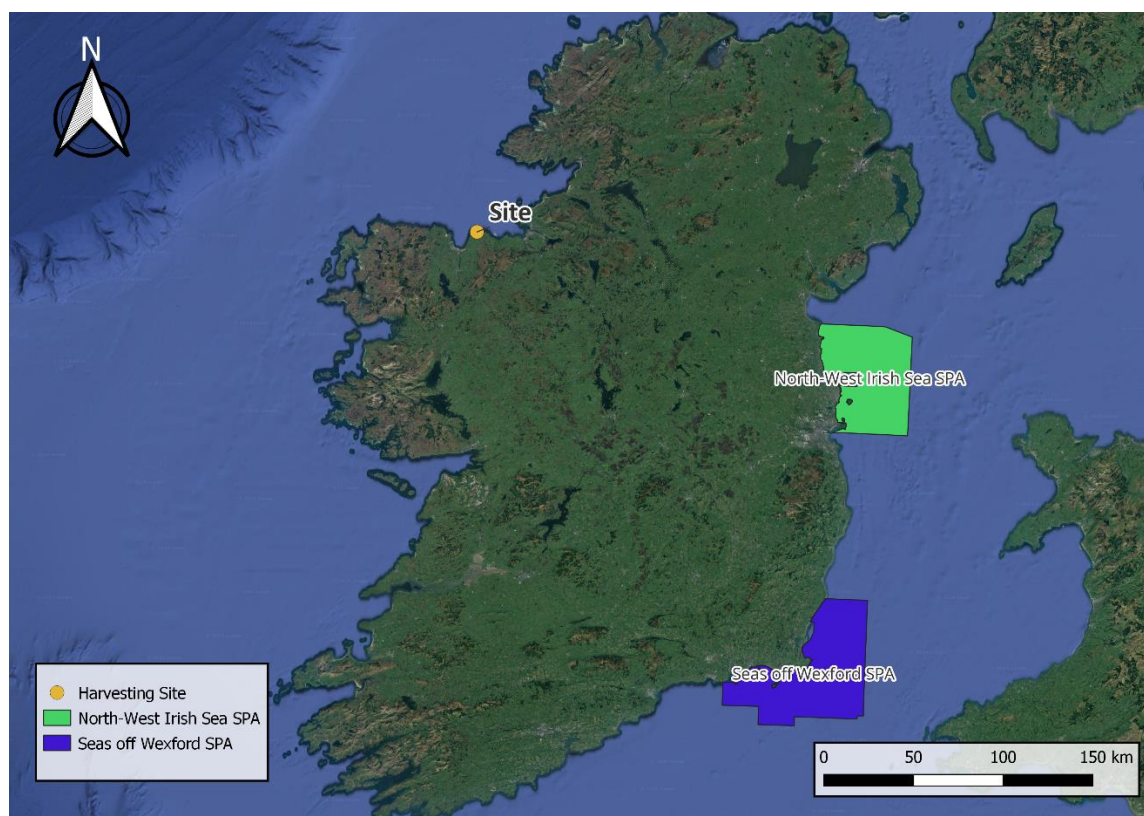


Figure 2-2: Newly designated SPA's in relation to the project site.

Upon review of the potential impact mechanisms and the newly designated SCIs, the SPR pathway determined that there is no connectivity given the nature of the harvesting works. As the work will be carried out at a distance of over 180 km from both SPAs and that the harvesting activities will not have a long-term significant effect on the ecology of the harvest areas there will be no interaction with the SCI species listed either directly or indirectly and therefore these SCIs can be screened out.

2.3. Plans or Projects That Might Act in Combination

This section provides an updated review of plans or projects which may have in-combination effects with the proposed project since the original Screening for Appropriate Assessment report.

Given the nature of the proposed activities associated with the Project, the potential project impact mechanisms (or sources of impact) are:

- Disturbance to habitat and associated species
- Removal of target and non-target species
- Uncovering of previously hidden fauna
- Uncovering of previously hidden fauna
- Trampling (during access and harvesting)
- Reduction in dampening effect

The assessment of potential in-combination effects considers other plans and projects that may result in significant effects to conservation features of SACs and SPAs. To inform the assessment of potential in-combination effects a review of consent applications for projects in the vicinity of the proposed Project included on the following websites was completed in November 2024:

- DHPLG - EIA Portal¹
- Sligo County Council - Planning System²

Screening assessments of potential in-combination effects from current and proposed projects listed on above websites are summarised in **Table 2.1**.

In summary, the assessments presented in **Table 2.1** conclude that there is no potential likelihood for significant effects caused by in-combination effects.

Table 2.1: Assessment of potential in-combination effects.

Website	Project Details	File Reference	Date Application Received	Assessment of Potential Cumulative or In-combination Effects	Potential significant effect assessment
DHPLG - EIA Portal	A search of the DHPLG EIA Portal was undertaken to examine projects with potential for in-combination effects.	22401	25/11/2022	Though an application for the extension of the lifespan of the operational Lackan Wind Farm by 12 years to October 2035, with mitigation outlined in the accompanying EIAR for that project and the lack of significant effects on conservation features in the current project, it was determined that there was no potential for in-combination effects to occur with the proposed Project.	No potential significant cumulative or in-combination effects
Sligo County Council - Planning System	A search of the Sligo planning databases was undertaken to examine projects with potential for in-combination effects.	-	-	Applications made typically to Sligo County Council and published on the planning database in the vicinity of the project consisted of extensions and renovations to existing houses, and retention of existing developments. These are small-scale terrestrial developments which do not have the potential to result in cumulative effects in combination with the proposed Project.	No potential significant cumulative or in-combination effects

2.4. Reviewed Screening Outcome

Upon review of the recent changes to European sites since the original Screening for Appropriate Assessment was produced, the reassessment concluded that due to lack of significant effects identified through the SPR model the original conclusion is upheld:

'The assessment has determined, in light of best available scientific data, that there is no potential for significant effects on Natura 2000 sites.

The assessment also determined that there is no potential likelihood for significant effects from the proposed activities in combination with other plans or projects.

Given the nature and scale of the proposed harvesting activity, and the distance to the harvest areas from designated Natura 2000 sites, it can be concluded that there harvesting activities will not have a significant effect on designated Natura 2000 sites - there are no impact pathways and effects are ruled out.'

3. References

- CIEEM. (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. *Chartered Institute of Ecology and Environmental Management, Winchester.*
- DEHLG. (2009). Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (Revised February 2010).
- Environment Agency. (2003). River Habitat Survey in Britain and Ireland Field Survey Guidance Manual 2003.
- European Commission. (2000). Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. *Office for Official Publications of the European Communities, Luxembourg.*
- European Commission. (2002). Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. *Office for Official Publications of the European Communities, Luxembourg.*
- European Commission. (2007). EU Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the concepts of alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the Commission.
- European Union. (1992). Habitats Directive: Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.
- Environmental Protection Agency. (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR). May 2022.
- European Union. (1992). Habitats Directive: Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.
- Fossitt, J.A. (2000). A guide to habitats in Ireland. *The Heritage Council.*
- National Roads Authority. (2009). Guidelines for Assessment of Ecological Impact of Road Schemes.
- OPR (2021). Practice Note PN01 Appropriate Assessment Screening for Development Management.

¹ DHPLG - EIA Portal: <https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal>

² Sligo County Council - Planning System: <https://eplanning.ie/>