Request for Observations on an application for a Maritime usage licence Ref: MUL230038

Proposed activity:

The proposed surveys are important in identifying any new future discharge outfall for the upgraded WWTP and thus also towards ensuring that there is no impact on the water quality for licenced aquaculture sites. The surveys include a dye trace survey; however, the time limited and dispersive nature of this survey will not impact the shellfish production areas within Ballyness Bay.

BIM comments:

BIM acknowledges the reference to aquaculture and fisheries within Ballyness Bay within the AIMU report attached to this application. "*There are several aquaculture licenced sites within Ballyness Bay, related to the farming of Pacific Oyster and Manila Clam, which were granted in May 2024 by the Aquaculture LicencesAppeals Board, previously held aquaculture licences for the Bay lapsed in 1999. Ballyness Bay is currently not a Designated Shellfish Area nor a Classified Bivalve Mollusc Production Area.*"

BIM acknowledge the importance of *"The proposed future upgrading/replacement of Falcarragh WWTP will ensure that water quality is maintained within the thresholds of Article 5 of Directive 2006/113/EC [quality required for shellfish waters], with faecal coliforms and E.Coli the key parameters of concern for shellfish production areas. The proposed surveys are important in identifying any new future discharge outfall for the upgraded WWTP and thus also towards ensuring that there is no impact on the water quality for licenced aquaculture sites. The surveys include a dye trace survey; however, the time limited and dispersive nature of this survey will not impact the shellfish production areas within Ballyness Bay."*

The main concern from a fisheries context would be disturbance to fishing, and accidental entanglement with static fishing gear by the survey vessels, and/or by fishing vessels with the deployed survey equipment. Instances of this has happened historically, where strings of pots were reported as being towed by survey vessels.
The main comment to make therefore is that early and continuous communication is made with stakeholders in the survey areas to avoid any conflicts arising from such incidents as stated above.

Therefore, timely notification to notify fishers on the ground, through direct contact using the Irish Fleet Register Sea-Fishing Boat Licence Applications, Forms and Conditions should be taken. Additional, usual channels of communication, such as Marine Notices, the Producer Organisations such as the IS&EFPO, IIMRO, NIFA, local RIFF, all the relevant harbour port offices and local authority offices, and local media including Marine Times where possible covering the impacted area.