



report remains relevant – in particular the concerns expressed about the Trawbreaga Bay part of this proposal.

No species other than *Ascophyllum nodosum* is proposed for harvesting in this 2024 application ( the 2013 application included smaller quantities of other seaweed species).

I understand that no consent issued on foot of the 2013 foreshore licence application to DOECLG and that it was withdrawn in/after 2021 – to be replaced by the current maritime usage licence application to MARA.

The areas for which a maritime usage licence has been applied for are called Maritime usage licence areas in this set of 2024 application documents . The areas mapped for this maritime usage in the three Bays are entire intertidal zone areas in a certain portion of each Bay. No differentiation is made in the applied for area between upper and lower intertidal levels or between different substrates e.g. rock outcrop areas where wrack may be abundant and sand only areas (with little or no wrack). The areas are identical in extent to those applied for in the 2013 foreshore licence applications

In my opinion only the specific areas for potential harvesting should be included in any foreshore licence that may issue. This would offer better protection to other beneficial usages of the shore – for example to areas licensed under the Foreshore acts for aquaculture activity.

Overlap of these maritime usage harvest areas with licensed shellfish aquaculture sites is significant in all three bays and in general terms is similar to that outlined in my 2013 report. Note there will have been some changes in extent of licensed sites in the 3 bays over the past 12 years and to establish the actual overlap today MARA may access updated map information showing the currently licensed sites in these Bays on the Aquaculture viewer website <https://dafm-maps.marine.ie/aquaculture-viewer/>.

Based on my examination of the current set of supporting documents for the MUL240002 Maritime Usage Licence applications my observations are as follows:

1. All 3 bays: Given that there is overlap in all three bays between the licensed shellfish sites and the very extensive maritime usage licence areas applied for in these cases It is not sufficient in my opinion to argue as in 6.5.2.2. of Assessment of Impacts on Maritime Usage for Seaweed Harvesting “*Ascophyllum* is unlikely to occur in this area due to its preference for intertidal area and anchoring on hard substrates . Therefore there are no potential interactions between *Ascophyllum* harvesting and oyster/clam production areas”. If it is the case that aquaculture and seaweed harvest areas do not in practice coincide then I argue that the aquaculture licence areas could be easily excluded completely from any permitted maritime usage licensed map area that may issue with a consent in these 3 cases. That way aquaculture licence areas are given clear protection from potential cumulative seaweed related vehicle access /harvesting impacts. I think it

would be important that licensed aquaculture sites are very clearly excluded from the seaweed maritime use maps that may be consented to in all three bays.

2. All 3 bays : It would be appropriate that only certain seaweed collection points for lorry loading be designated - specified only where the access and the ground/structure itself is suitable for such lorries and loaders to operate on and where the activity will not significantly impinge on other beneficial usages of the Bay and its environs.
3. Dungloe Bay – the proposed keeping of a minimum distance of 200m away from potential breeding and moulting sites of harbour seals ( refer section 6.4.3.3 Assessment of Impacts on Maritime Usage for Seaweed Harvesting) would if implemented result in a significant reduction in consented to harvestable area in Dungloe Bay. If this mitigation measure is accepted by the licensing authority it should be formalised in any licence that issues by reducing the permitted harvest area accordingly i.e. excluding these specific exclusion zones from the maritime usage licence mapped area. The exclusion zones would presumably be based on the NPWS mapped breeding and moulting sites ( as define in the SAC site conservation objectives document ( site code 002283)). Note that the same approach is taken by this Department in aquaculture licensing in Dungloe Bay in order to ensure there is no overlap between licensed aquaculture activity and the 200m radius exclusion zones at NPWS designated seal haul outs.
4. Trawbreaga Bay – I am surprised that the draft screening statement for appropriate assessment concludes there is no potential for significant effects from the proposed project on the conservation features of the Natura 2000 site areas applicable at Trawbreaga Bay. Appropriate assessment is considered necessary for shellfish culture in this Bay. While some boat transport is used at Doaghmore to take wrack ashore much of the wrack currently collected at this Bay is not actually transported across the shore by boat but is moved by tractors with fitted cages/buckrake. Trailers are also used. Seaweed harvesting in this Bay therefore brings with it significant land based vehicle activity on much of the upper foreshore areas where seaweed is harvested and in accessing those areas. The proposed collection of 4000 tonnes of wrack seems to be a very high quantity for this bay – given its relatively small size. Aquaculture related tractor traffic on this foreshore (that I am familiar with) does have a physical impact on the shore, can cause disturbance in Natura 2000 site and can reduce erosion resistance of the natural substrate over time. Mitigation of aquaculture related vehicle traffic impact is attempted by specification in this Department's licences of use of approved access points and intertidal zone access routes only and by certain vehicle use/pollution prevention requirements incorporated in each aquaculture licence issued. To mitigate impact of seaweed related tractor traffic I think it would be important to restrict the maritime usage area consented to for seaweed harvesting in Trawbreaga Bay and reduce it from the very extensive intertidal area applied for to a more realistic and carefully selected subarea of this. For example I recommend that the small zostera dominated community area identified in the south part of the Bay (refer area marked in green on Figure 2 of NPWS North Inishowen Coast (site code 2012) conservation



Query on location : the five locations are not all covered in the SSAA document which seems to deal with locations 2 and 3 only . Foreshore Licence Map A and B use out of date Historic OS maps raster backgrounds and seem to cater for locations 2 and 3 only.

The application is a relevant foreshore authorisation which has been transferred to MARA in accordance with the provisions of Section 1E(5A) of the Foreshore Act 1933 (as amended). The application is for a Maritime Usage Licence under Section 117 of the Maritime Area Planning Act 2 The reference FS00626 given by MARA in their letter dated 5/12/25 is incorrect – it should be FS006844)

The completed application form proposes collection of *Fucus Serratus* (also known as serrated wrack). The application form does not state a quantity of wrack that might be harvested. Harvest quantities of 2 seaweed types are given for certain Easkey Strand locations in the 2021 Screening Statement but the application form itself is silent on any proposed harvest quantity. Also as outlined above the application documents do not make clear which of the 5 locations listed in part 2.3 of application form are relevant to MUL250004.

Clarification will be needed on what harvest sites and what harvest quantity for each site are actually proposed in this MUL licence application. As it stands the set of documents give a confused picture of the application.

I have sent an email query to MARA dated 9/1/26 asking for clarifications on areas and harvest quantities. (copy email attached to this report) on the proposed development .

To comment further I think clarifications would need to be received from MARA (or the applicant) on proposed harvest locations and proposed harvest quantities and any other relevant information that might clarify the proposal.

Another problem is that the seaweed tonnages for the 8 harvest areas in Table 2.1 (and in Appendix A) of the September 2001 Screening Statement appear to have been wrongly calculated. I think they overestimate the resource biomass by a factor of 10. Take for example Harvest area 5 – the *laminaria digitata* seaweed area is actually 15300m<sup>2</sup> which when multiplied by density of 23.2 kg/m<sup>2</sup> (table 3.2 ) gives a total of 356816 kg or 357 tonnes (of *laminaria digitata*) and not the 3567.2 tonnes listed in Table 3.3. I recommend that MARA cross check this possible issue with the biomass survey findings.

Note that 20 years ago we had some contact with Celtic Seaweed Products Ltd who were submitting foreshore licence applications for wrack harvesting to this Department. The foreshore file references at the time were MS 51/14/155 and MS51/14/162. The company has expanded since then and proposed harvest operation may be larger.



Paul O'Sullivan

Marine Engineering Division

9/1/26

Mr. Campbell, Divisional Engineer

Ms Gill, AFMD

**RE: Foreshore application for seaweed harvesting by Oilean Glas Teo,  
Co. Donegal**

File ref: FW/15/4

Ms Gills memo of 23/12/13 and foreshore application documents on DOECLG website refer.

The application is for harvesting on specified extensive lengths of shoreline /intertidal area in three bays on the County Donegal coast :

Rutland Island/Dungloe Bay

The applicant proposes harvesting up to 8000 tonnes of knotted wrack per annum (11.8% of estimated biomass based on 2013 survey) from this area.

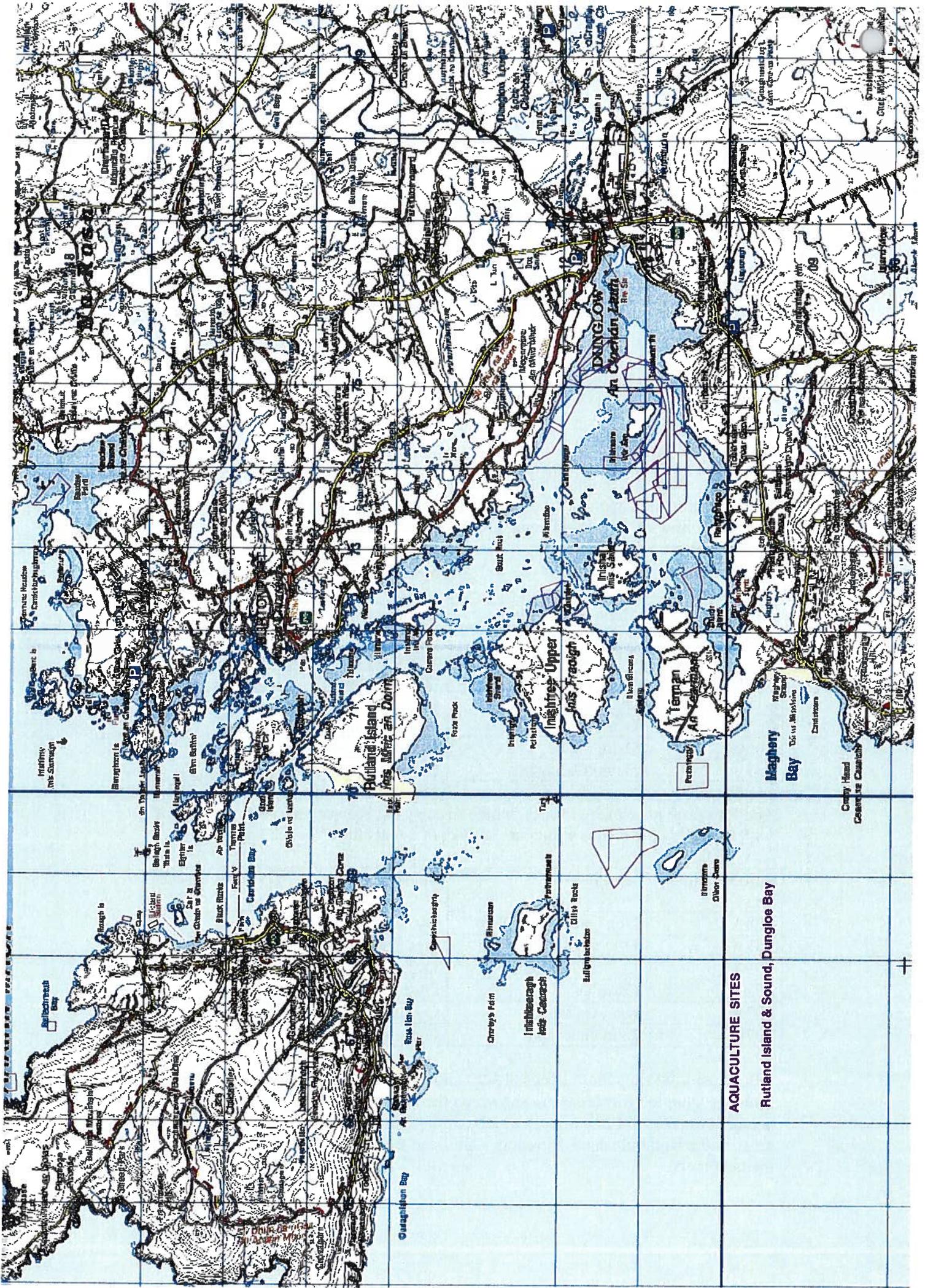
The foreshore area applied for on which to carry out seaweed harvesting overlaps with the following 8 licensed aquaculture sites :

<b>Aquaculture site</b>	<b>Licensee</b>	<b>Species</b>	<b>Overlap extent</b>
58C	Manus McGonigle	Clams, oysters	Full
316	Inish Sal Teoranta	Oysters, clams	Full
422A	Ostre'an	Oysters, clams	Full
205B	Ostre'an	Oysters, clams	Partial
315A	Ostre'an	Oysters, clams	Partial
205A	Ostre'an	Oysters, clams	Partial
205C	Ostre'an	Oysters, clams	Partial
287	David Gallagher	Oysters	Partial

The foreshore area applied for on which to carry out seaweed harvesting overlaps with the following 6 sites which are subject of aquaculture licence applications:

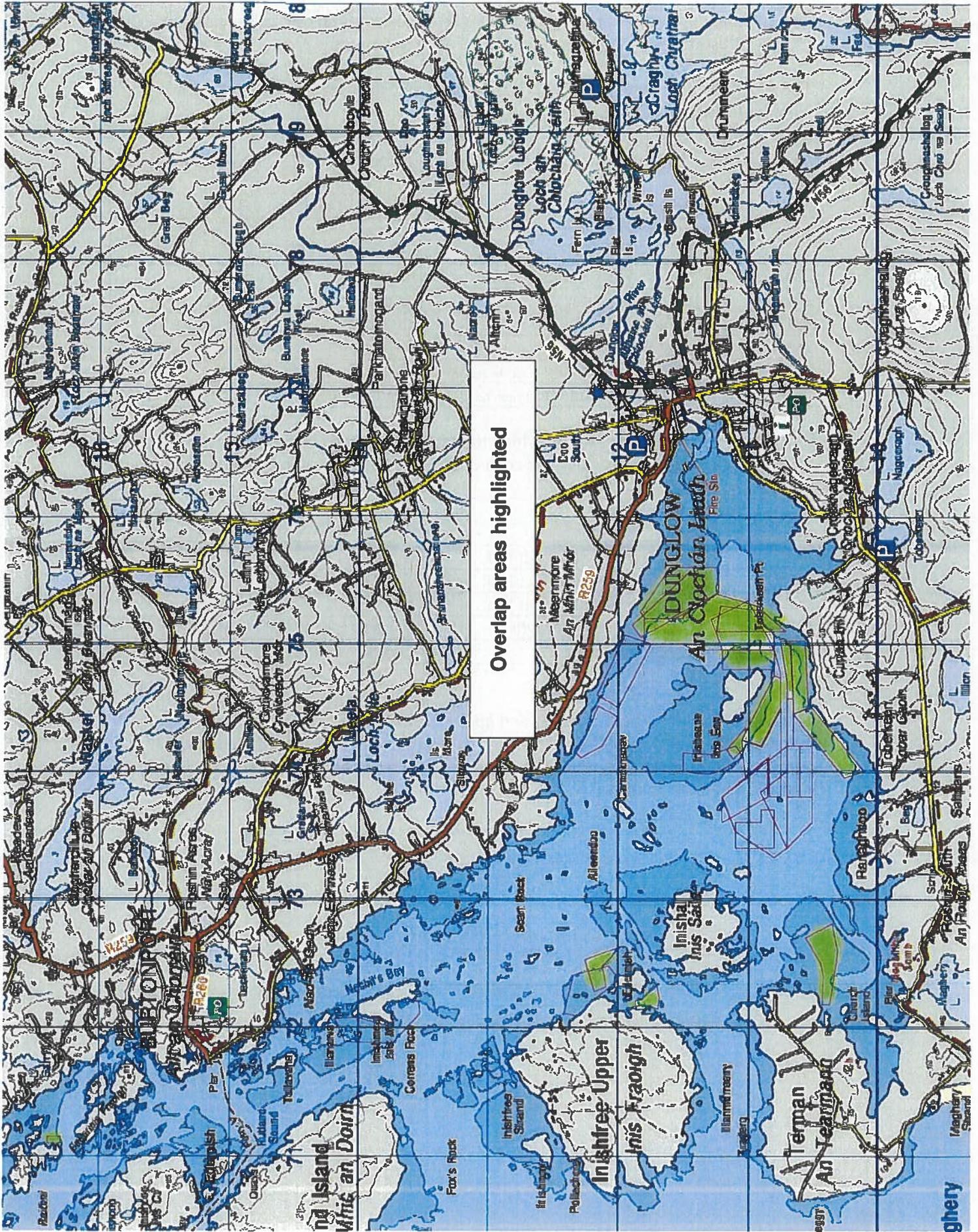
<b>Aquaculture site</b>	<b>Applicant</b>	<b>Species</b>	<b>Overlap extent</b>
408A	Donegal Ocean Deep	Oysters	Full
357A	O'Donnell/Gallagher	Oysters, clams	Partial
395A	C. Reid + others	Oysters	Partial
392A	Ostre'an	Oysters	Partial
307A	John Gallagher	Oysters	Partial
307B	John Gallagher	Oysters	Partial

All aquaculture sites (both licensed sites and applications) in the Rutland Island & Sound + Dungloe Bay areas are shown on the map overleaf. The subset of these aquaculture sites (14 in number) which overlap with the proposed seaweed harvest areas in the Rutland Island & Sound + Dungloe Bay areas are shown highlighted on the next map.



**AQUACULTURE SITES**

Rutland Island & Sound, Dungloe Bay



Overlap areas highlighted

## Mulroy Bay

The applicant proposes harvesting up to 2000 tonnes of knotted wrack per annum (10.1% of estimated biomass based on 2013 survey) from this area.

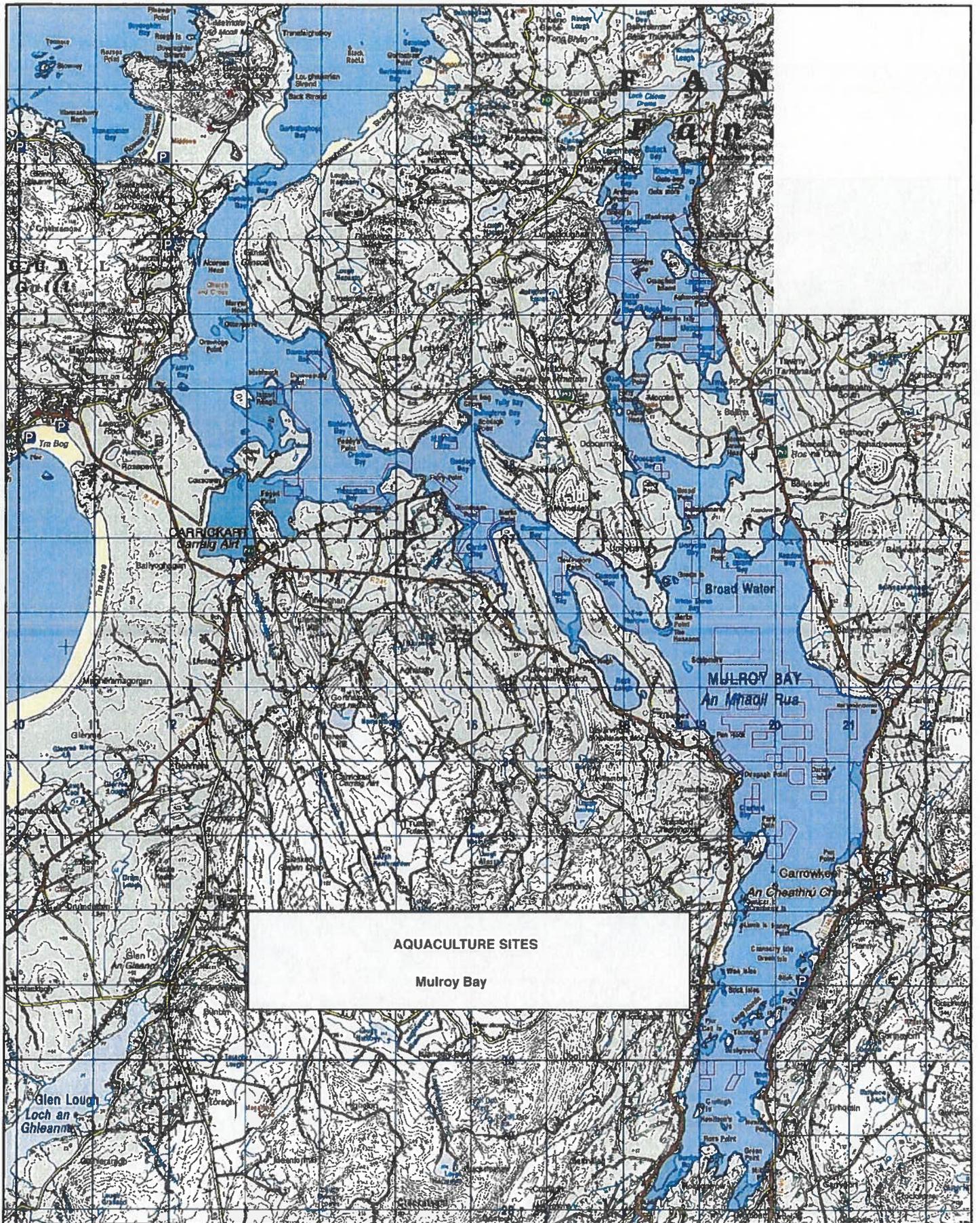
The foreshore area applied for on which to carry out seaweed harvesting overlaps with the following 8 licensed aquaculture sites:

<b>Aquaculture site</b>	<b>Licensee</b>	<b>Species</b>	<b>Overlap extent</b>
53B	Mulroy Bay Mussels	Mussels (susp.)	Partial (v.small)
77A	Marine Harvest Ireland	Salmon (holding)	Partial (v.small)
203F	North West Shellfish Ltd.	Scallops	Partial
281A	Anthony Duffy	Oysters	Partial
381B	Anthony Duffy	Oysters	Partial
281C	Anthony Duffy	Oysters	Partial
274A	Alan McGlinchey ( may be lapsed)	Oysters, clams	Partial
104C	Feirmeacha na mara (may be lapsed)	Oysters clams	Partial

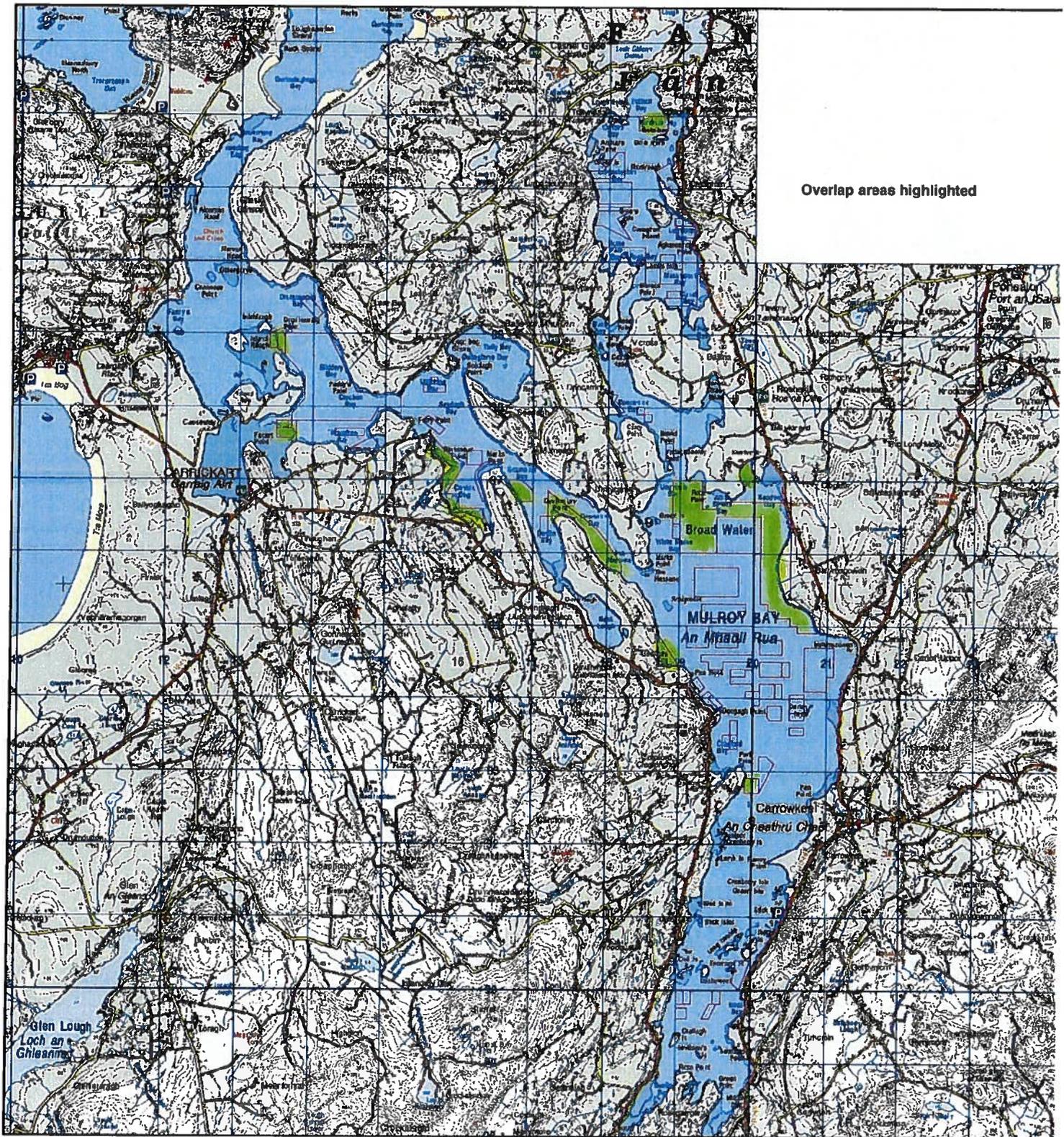
The foreshore area applied for on which to carry out seaweed harvesting overlaps with the following 5 sites which are subject of aquaculture licence applications:

<b>Aquaculture site</b>	<b>Applicant</b>	<b>Species</b>	<b>Overlap extent</b>
203C	North West Shellfish Ltd.	Scallops	Partial
203J	North West Shellfish Ltd.	Scallops	Partial
387G	North West Shellfish Ltd.	Scallops	Partial
370A	M Shiels & P Heraghty	Oysters	Partial
400A	Anthony Duffy	Oysters	Partial

All aquaculture sites (both licensed and applications) in the Mulroy Bay area are shown on the map overleaf. The subset of aquaculture sites ( 13 in number ) which overlap with the proposed seaweed harvest areas in the Mulroy Bay area are shown highlighted on the next map.



AQUACULTURE SITES  
Mulroy Bay



Overlap areas highlighted

### Trawbreaga Bay

The applicant proposes harvesting up to 4000 tonnes of knotted wrack per annum (9.7% of estimated biomass based on 2013 survey) from this area.

The foreshore area applied for on which to carry out this seaweed harvesting overlaps with the following 19 licensed aquaculture sites:

<b>Aquaculture site</b>	<b>Licensee</b>	<b>Species</b>	<b>Overlap extent</b>
336A	John McKinney	Oysters	Full
230	Michael McLoughlin	Oysters	Partial
352A	Philip M Doherty	Oysters	Partial
229A	PD Porteous	Oysters	Partial
354A	James Ball	Oysters	Partial
355A	Shaun McKinney	Oysters	Partial
177A	John McKinney	Oysters	Partial
244	W A Coffey	Oysters	Partial
353A	W A Coffey	Oysters	Partial
227	Alan Byrne	Oysters	Partial
359A	Bells Seafood Ltd.	Oysters	Full
363A	Bells Seafood Ltd.	Oysters	Full
215	Tony Kearney	Oysters	Full
231	Stephen Kearney	Oysters	Full
360A	Pat McDaid	Oysters	Full
216	Michael Doherty	Oysters	Partial
190A	Derek Diver	Oysters	Partial
351A	Gerard Diver	Oysters	Partial
345A	Derek Diver	Oysters	Partial

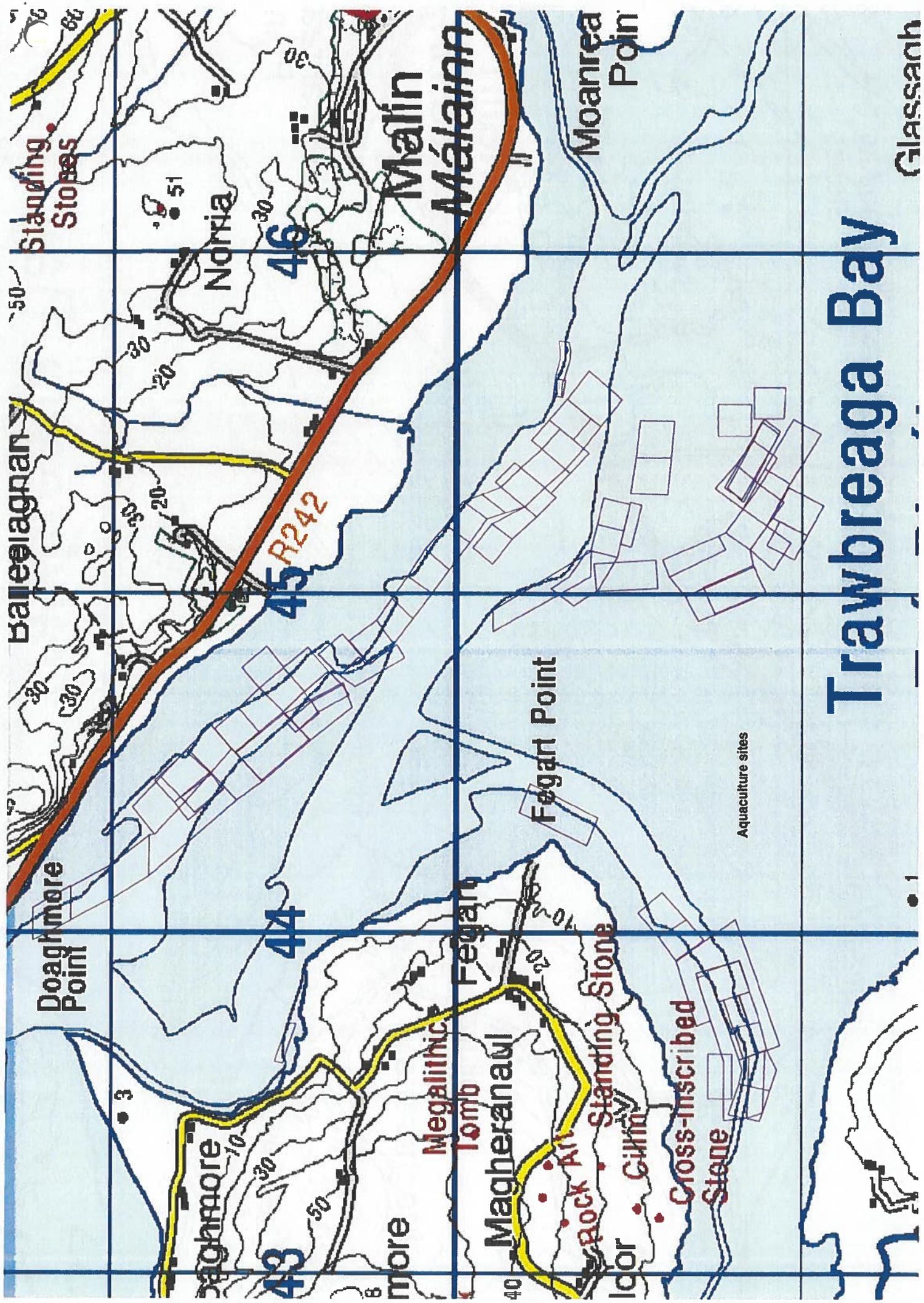
The foreshore area applied for on which to carry out seaweed harvesting overlaps with the following 35 sites which are subject of aquaculture licence applications:

<b>Aquaculture site</b>	<b>Applicant</b>	<b>Species</b>	<b>Overlap extent</b>
450A	P D Porteous	Oysters	Full
437A	P D Porteous	Oysters	Full
470A	Michael McLoughlin	Oysters	Partial
472A	James Neary	Oysters	Partial
475A	Michael McLoughlin	Oysters	Partial
440A	S. McKinney	Oysters	Partial (v. small)
426A	Michael Barr	Oysters	Partial (v. small)
453A	Michael McLoughlin	Oysters	Partial
444A	Philip Doherty	Oysters	Partial
466A	James Ball	Oysters	Partial
450B	P D Porteous	Oysters	Partial
437A	John McKinney	Oysters	Partial
437B	John McKinney	Oysters	Partial

385A	John McKinney	Oysters	Partial
383A	W A Coffey	Oysters	Partial
384A	Philip M Doherty	Oysters	Partial
411C	Bronagh Kearney (illegal)	Oysters	Partial
413C	P Kearney (illegal)	Oysters	Partial
439	James Ball	Oysters	Partial
345B	Derek Diver	Oysters	Full
427A	Philip C Doherty	Oysters	Full
427B	Philip C Doherty	Oysters	Full
416A	Anthony Kearney	Oysters	Full
468B	Danny McDermott	Oysters	Full
447A	Pat McDaid	Oysters	Full
429A	Stephen Kearney	Oysters	Full
411A	Bronagh Kearney	Oysters	Full
406A	Shaun McDaid	Oysters	Full
418A	Stephen Kearney	Oysters	Full
420A	Anthony Kearney	Oysters	Full
411B	Bronagh Kearney	Oysters	Full
415	Stephen Kearney (2 sites)	Oysters	Full
473A	Michael Farren	Oysters	Partial
345 A1	Derek Diver	Oysters	Partial
368A	Patrick Diver	Oysters	Partial

All aquaculture sites (both licensed and applications) in the Trawbreaga Bay area are shown on the map overleaf. The subset of aquaculture sites (54 approx. in number ) which overlap with the proposed seaweed harvest areas in the Trawbreaga Bay area are shown highlighted on the next map.

There is clearly a very significant degree of overlap between the proposed seaweed harvest proposal and areas of aquaculture activity/interest in this Bay. This gives rise to concern to this Department who are the appropriate authority for regulation of aquaculture that there may be environmental impact interactions and cumulative environmental impact issues arising. These could limit or curtail the valuable aquaculture activity already established in the bay – and which may in future years develop and expand further subject to appropriate assessment and other considerations.



Standing Stones

51

Norria

46

Malin  
Málainn

Moanrea  
Point

Balleiaghan

45  
R242

Doaghmore  
Point

44

Fegart  
Point

Aquaculture sites

Doaghmore

43

more

Megalithic  
Tomb

Magheranau

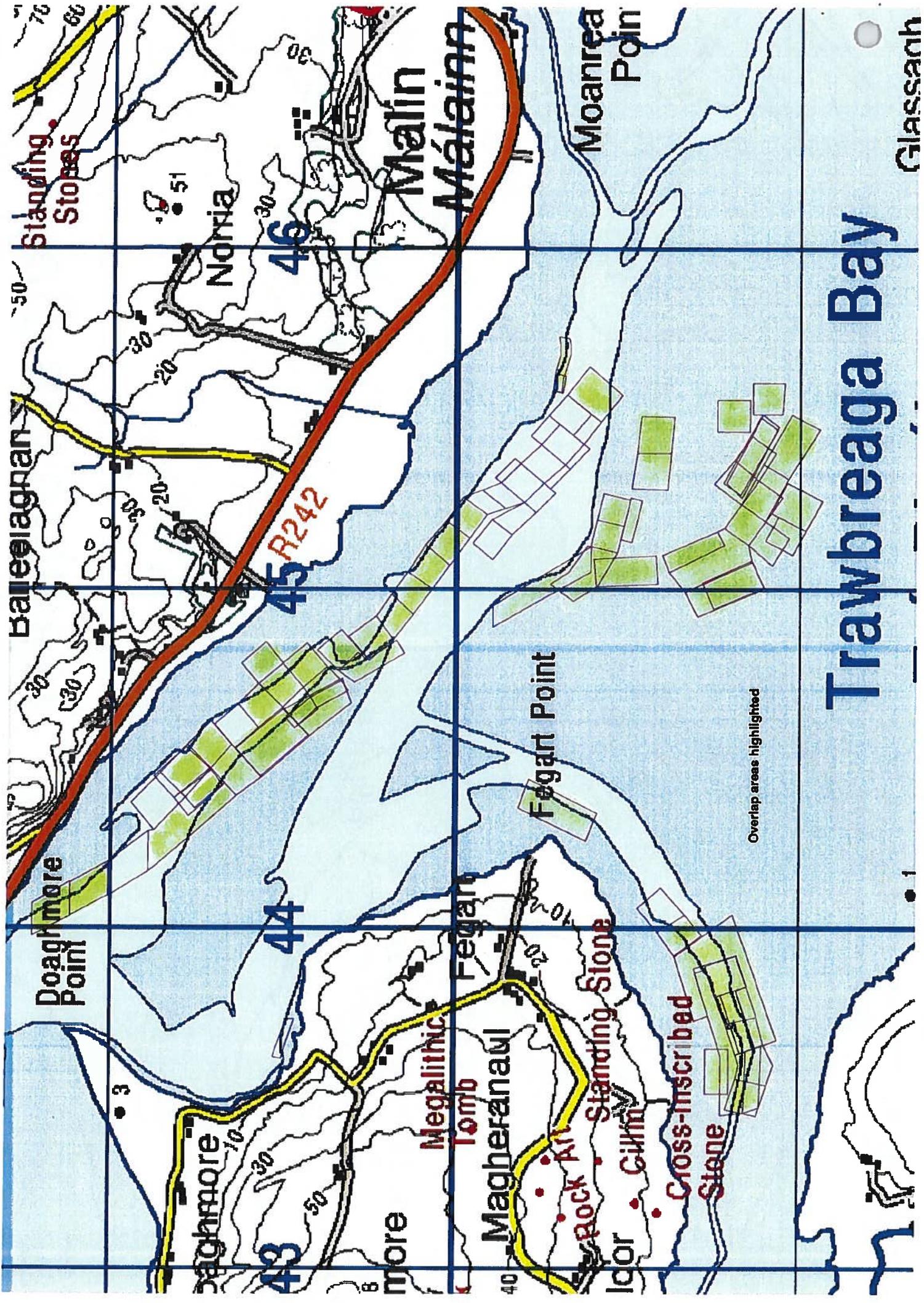
Rock Art  
Standing Stone

loor  
Gillin

Cross-inscribed  
Stone

# Trawbreaga Bay

Glassah



Overlap areas highlighted

# Trawbreaga Bay

Glassanah

### Observations on completed foreshore application form of Oilean Glas Teo

I note that indicative start date is given as 1/9/13 at section 1.3 – this date precedes the date of application and any decision on consent (unless the applicant already held such a consent – section 1.7 states that no previous licences are held). I understand from the website of the applicant that harvesting at Rutland and Mulroy may have taken place in the past.

I note that DAFM or BIM are not among the bodies consulted on the application (section 4.1). If the applicant had consulted these he might have identified more potential for overlap with aquaculture sites than he recognises at sections 7.1 and 7.3 of the completed application form.

I note reference to other traditional foreshore users at 4.3 – extent of current seaweed harvesting in these bays is not outlined - further information would be helpful on this in order to put the proposed development in context.

The proposed breakdown by bay of the proposed 14000 harvested tonnes per annum of *Ascophyllum nodosum* ( knotted wrack or egg wrack) is made clear in the application forms. The NIS documents also estimate the quantity of that seaweed in each of the 3 bays. What is not clear is where or in which Bay the applicant intends to harvest the other 400 tonnes per annum of oarweed, spiral wrack, carrageen and dulse or what the available resource of these less common seaweeds might be in each of the target bays. This is a deficiency in information provided in support of application.

### Observations on Rutland Island and Sound Natura Impact Statement of September 2013

No quantity is put on existing seaweed harvest take from the area. The harvest proposal is considered in isolation in this NIS.

This proposed harvesting of 8000 tonnes/annum of knotted wrack in Rutland island/Dungloe Bay combined with 6000 tonnes per annum in 2 other bays means that this is a significant total in national harvest terms – see reference to historic annual harvest countrywide of 8-28000 tonnes per annum on page 7.

The application and the NIS on page 7 refer to bundles of cut wrack being towed “usually by small boat to a pier for collection by lorry”. It is not clear that use of trailers or forklifts on foreshore for that purpose will not be used. Use of boats only would be preferable environmentally – and I know that some collection is done this way near Burtonport - but I know that tractors, trailers and teleporters are also used in seaweed collection operations in this Bay and that these operations may leave more of a footprint /cause more disturbance than purely boat based operations.

The harvestable areas shown on Figure 3.1 of NIS has generally a much less extensive width on foreshore than on application map – this green line on Figure 3.1 may be indicative only ; it would be important to consider whether in fact the entire foreshore width actually applied for is justified – it appears to me that much shore area on the shallow sloping intertidal areas in particular is of little seaweed harvest value eg intertidal foreshore on northwest of Inisheane for instance. The applicant may not be sufficiently selective in the areas applied for or alternatively the NIS may not be sufficiently precise about shore position that seaweed is likely to be harvested from.

The environmental survey in section 6.1 of the NIS focuses almost exclusively on quantifying the knotted wrack resource. Information collected on other species of flora and fauna is minimal/less detailed.

I don't agree with conclusion in section 7.8 that no activities occur in the area that would result in combined effects – it fails to take account of other seaweed collection activity in the Bay and of shellfish aquaculture activity in the bay.

This NIS is not particularly detailed given location of proposed activity in SAC002283 and proximity to other Natura 2000 areas. I note NPWS letter of 29/7/13 in Appendix 2 of NIS which refers to the applicant developing a sustainability programme or plan for managing the seaweed harvesting sites and NPWS recommends certain measures for this plan. However other than the 5 year harvesting Plan (tonnages only) I see little reference to a sustainability programme in the NIS the application form or elsewhere in supporting documentation. I think such details would be important to allow the competent authority carry out its appropriate assessment of this proposal (for all three Bay areas).

#### **Summary comments on Rutland Island/Sound component of seaweed harvesting proposal**

Seaweed harvesting is already well established in many parts of the area. It would be important for foreshore authority to cross check this proposal against any permits that may have issued in the past for such activity. There used to be a seaweed plant operational in the Meenmore area (Arramara Teo) now closed – it was partly supplied by local harvesting and I have seen seaweed harvesting activity in more recent years in parts of Dungloe Bay and south of Burtonport.

The potential for overlap with licensed aquaculture is mainly limited to the oyster farms in the Inisheane island area, and on east of Termon and on Inishfree. I recommend that such licensed areas be clearly excluded from any consent that may issue.

This Department has seen new applications for aquaculture in Dungloe Bay in recent years- some of which have been licensed. There is potential for more such activity. Were seaweed harvesting to be licensed for all the foreshore area applied for in the Bay it may restrict future aquaculture development potential in such areas in the future. A possible solution may be to ensure that seaweed harvesters do not have exclusive rights to foreshore usage in any area licensed and to make express provision in any consent for the possibility of later licensing of aquaculture on those same areas.

In my opinion there probably is sufficient information to lead to a positive appropriate assessment outcome – especially given history of seaweed harvesting in this general area but this decision on whether AA is needed is for the competent authority to make. From a fisheries perspective we would be anxious to ensure that the seaweed harvesting development if permitted does not limit or restrict aquaculture development in the area – and in particular that overlap areas are omitted from any

consent issued and that there is strict conditioning in any consent issued regarding sustainable harvest techniques and a requirement that boat transport only be used for moving seaweed ashore – this in order to avoid an intensification of vehicle use on foreshore areas some already in use for aquaculture purposes and to reduce combination impacts.

### Observations on Mulroy Bay Natura Impact Statement of September 2013

Many of the same observations made regarding the Rutland Island NIS would also apply to the Mulroy Bay NIS

I note that reference on page 7 “to bundles being towed by small boat to a suitable pier for collection..” – the word “usually” is not used in this case. There may be less likelihood of vehicles such as tractors etc. being used in this case?

The number of piers available for collecting wrack in the Bay may be few in number.. Most of these piers are relatively small and are used largely for aquaculture – eg Woodquarter, Cranford and Kerrykeel piers. It may be necessary for the applicant to identify the collection piers in mind and indicate how seaweed harvesting activity will not interfere with other pier usages

The environmental survey in section 6.1 of the NIS focuses almost exclusively on quantifying the knotted wrack resource. Information collected on other species of flora and fauna is less detailed.

I don't agree with conclusion in section 7.12 that no activities occur in the area that would result in combined effects – it fails to take account of aquaculture activity in Mulroy Bay. To what extent there is harvesting of wrack by others in the Bay and possible cumulative effects is also not clear

Section 8 mitigation measures refers to a sustainable harvest plan but other than a list of target annual harvest tonnages I am unsure if the plan consists of a great deal else.

This NIS is not particularly detailed given location of proposed activity in an SAC no. 002159.

### Summary comments on Mulroy Bay component of seaweed harvesting proposal

There are some overlap issues between this proposal and aquaculture in the bay – but in general ( putting aside the question of proposed pier use) they are minor – I recommend excluding the small areas of foreshore overlap from the seaweed harvest areas and I think that the two activities can co-exist. Most of the mussel and salmon aquaculture in the Bay is not in intertidal area and therefore will not be impacted on significantly. The oyster farms in the Bay do operate in some of the same intertidal area - they are generally small in scale though and subject to appropriate conditioning in any foreshore permit that may issue some protection to their established activity can be provided by ensuring no seaweed harvesting in same licensed areas etc. –

Island Roy and Carrick Bay would be the main areas of interest for licensed oyster farms. There is also an application near Keadue Bay.

In proposed harvest volume terms Mulroy Bay is the smallest of the three harvest sites. In terms of potential impact on aquaculture it offers less problems for fisheries interests than the other two Bays in my opinion.

From a fisheries perspective we would be anxious to ensure that the seaweed harvesting development does not limit or restrict aquaculture development in the Mulroy Bay area. In particular it would be important to ensure that piers used for aquaculture purposes are not congested by seaweed collection activity, that longlines or cage structures are not damaged by seaweed towing in the Bay, that overlap foreshore areas are omitted from any consent issued and that there is strict conditioning in any consent issued regarding sustainable harvest techniques and a requirement that boat transport only be used for moving seaweed ashore – this in order to avoid an intensification of vehicle use on foreshore areas.

#### Observations on Trawbreaga Bay Natura Impact Statement of September 2013

Many of the same observations made regarding the Rutland Island NIS would also apply to the Trawbreaga Bay NIS

The NIS on page 7 refer to bundles of cut wrack being towed “usually by small boat to a pier for collection by lorry”. It is not clear that trailers or forklifts on foreshore will not be used. Use of boats only would be preferable environmentally – - but I expect that tractors, trailers and teleports might well also be used in seaweed collection operations in this Bay – given lack of suitable piers and shallow nature of much of the Bay. Such operations may leave more of a footprint /cause more disturbance than purely boat based operations. This aspect would need to be clarified as the method of seaweed collection will influence extent and nature of physical impacts on the shore.

The environmental survey in section 6.1 of the NIS ( has even less information than in other two NIS documents associated with this foreshore application ) focuses only on quantifying the knotted wrack resource at a handful of locations . Information collected on other species of flora and fauna (including other seaweed) is not provided. This is hardly an environmental survey. Some of the Bed lengths quoted in Table 6.1 also seem very high (eg 500m ) . I note that the total resource is calculated on an average band width of 150 metres of shore – I think this may be too wide and could lead to an overestimate of the total resource

I don't agree with conclusion in section 7.3 that no activities occur in the area that would result in combined effects – it fails to take account of aquaculture activity in Trawbreaga Bay. To what extent there is harvesting of wrack by others in the Bay and possible cumulative effects is also not made clear

Section 8 mitigation measures refers to a sustainable harvest plan but other than a list of target annual harvest tonnages provided in supporting documents I am unsure if the plan consists of a great deal else.

I don't think there is a clear basis demonstrated for the conclusion given in section 10 of the NIS of no significant negative impact on qualifying interests, habitat or conservation objectives.

This NIS is not particularly detailed given location of proposed activity in both SAC002012 and SPA004034.

**Summary comments on Trawbreaga Bay component of seaweed harvesting proposal**

Given potential for significant environmental impact in this case I think that a full appropriate assessment of the proposed development in Trawbreaga Bay is required. The NIS submitted is not a sufficient basis to proceed without a full assessment in my opinion.

I think our Department should express its opposition to this component proceeding without much more careful evaluation of the possible consequences of such a significant scale development in Trawbreaga Bay.

From an aquaculture perspective the Trawbreaga Bay part of this foreshore application is of particular concern to this Department. As can be seen from the tables and maps that I have compiled earlier in this report, the scale of direct overlap with areas of shellfish aquaculture interest is very extensive. The area applied for overlaps with almost all current oyster farms licenced and also with many applied for oyster farm sites (applied for in period 2007-13). This potential conflict arises in a Natura 2000 area – the Bay is both an SPA and an SAC. The Bay itself is already in my opinion under some environmental pressure due to current levels of shellfish and fishing activity. I have particular concerns about areas on north shore of the Bay. The introduction of a 4000 tonnes per annum seaweed harvest operation on top of existing foreshore usages may well increase levels of disturbance, foreshore tracking on access routes by machinery, physical change to near shore areas and increase further the potential for negative impacts on the Natura 2000 site in general.

New aquaculture licensing in Trawbreaga Bay has not occurred since 2007. Appropriate assessment of all existing and proposed aquaculture activity by the Marine Institute is underway. Until such time as that process is completed it is not possible to be definite about scale of aquaculture activity that the Bay can accommodate into the future.

The high number of aquaculture applications currently under consideration reflects the significant potential for expansion of the already valuable shellfish growing activity in this Bay. If all new applications were to be licensed it would potentially treble the area used for trestle based oyster culture at present.

It is important in my view that no new seaweed harvesting activity be consented to at this time as it could introduce add-on environmental impacts to that caused by existing shellfish aquaculture to the Bay and may also impact negatively on the potential for aquaculture expansion in certain parts of the Bay. Certainly the proposed commercial scale seaweed harvesting project would need to go through an appropriate assessment procedure (comparable to that which aquaculture is undergoing at present) – such assessment which also will take into account potential for cumulative impact with aquaculture activity, crab potting, boat angling and other beneficial usages in the Bay.

The access routes do not coincide with the more restricted set of access routes that the aquaculture industry in the Bay are currently permitted to use.

From a cost benefit perspective I would suggest that the economic value arising from established shellfish culture activity in Trawbreaga Bay is more valuable than the more seasonal and less labour intensive seaweed harvesting activity that may result from this proposed project. In terms of employment numbers and income generated the oyster farming is likely to make a significantly higher contribution to the local economy than seaweed harvesting. I would estimate that there are approximately 25 people engaged in oyster farming in the Bay on a regular basis.

I note that the seaweed harvest area in the Bay applied for includes virtually all foreshore area in the central portion of the Bay. No attempt is made to be more selective with the areas applied for – this is unhelpful in my opinion. I know there are extensive sand flat areas which have little or no seaweed growth – yet these areas are included in the seaweed harvesting application. A more selectively targeted area would have been appropriate in my opinion.

My preliminary opinion is that on a precautionary basis this Department should oppose seaweed harvesting at any scale in area no. 1.2 or area no. 1.3 (refer to application map). I would also advocate opposition to seaweed harvesting on certain parts of the Isle of Doagh shoreline (on the west side of Bay) where oyster farming is established.

I suggest that if seaweed harvesting were to be allowed to proceed on the south shore of the Bay it might best be only permitted within a certain maximum distance of the high water mark (say 100 metres). In addition if seaweed harvesting were to be allowed to take place on west shore of bay it should I think only be permitted to take place in non aquaculture areas and only within a certain maximum distance of the high water mark (say 50 metres in that case).

### Overall conclusion

Based on the information provided on this application I can see from a fisheries /aquaculture perspective that there may well be scope for the proposed developments in Dungloe Bay and Mulroy Bay proceeding subject to further information being provided and certain restrictions imposed through the consent process.

But I don't see that scope for progress generally in Trawbreaga Bay. In the Trawbreaga Bay situation there is very significant overlap with shellfish farm interests, the NIS information provided is of poor detail and it seems to me that the Department should request the competent authority to seek a full appropriate assessment of the proposed seaweed harvesting development proposal in that bay (if not the other 2) in order for it to be considered any further.

Refer also to summary comments made on each Bay proposal and to maps showing area overlap with aquaculture activity in this report.



Paul O'Sullivan  
Marine Engineering Division

31/12/13





**OSullivan, Paul**

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**From:** MARA Licence <licence@mara.gov.ie>  
**Sent:** Friday 9 January 2026 10:14  
**To:** OSullivan, Paul; MARA Licence  
**Subject:** Reply: Query about MUL250004

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Hi Paul,  
Thank you for your email.  
You are correct, there is a typo in the letter regarding the FS reference. It should be FS006844.  
I will forward your comments below to the Marine Advisor and revert back to you as soon as possible.  
Kind regards,

Joanne Staunton  
Licence Authorisation Team  
MARA

**An tÚdarás Rialála Limistéir Mhuirí (MARA)**  
Maritime Area Regulatory Authority

**An Dara hUirlár, Teach Menapia, Páirc Gnó Dhraighní,  
Draighneach, Loch Garman, Y35RF29.**

2<sup>nd</sup> Floor, Menapia House, Drinagh Business Park,  
Drinagh, Wexford, Y35RF29.  
W: [www.maritimeregulator.ie](http://www.maritimeregulator.ie)

**MARA**

An tÚdarás Rialála Limistéir Mhuirí  
Maritime Area Regulatory Authority

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**From:** OSullivan, Paul <[REDACTED]>  
**Sent:** Friday 9 January 2026 09:54  
**To:** MARA Licence <licence@mara.gov.ie>  
**Subject:** FW: Query about MUL250004

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**From:** OSullivan, Paul  
**Sent:** Friday 9 January 2026 09:36  
**To:** 'mac@mara.gov.ie' <[mac@mara.gov.ie](mailto:mac@mara.gov.ie)>  
**Subject:** Query about MUL250004

Hi

I work with DAFM. We are assessing this application ( for non-statutory consultation purposes) but are finding it difficult to assess.

The application documents lack coherency.

- 1 the FS reference in MARA note attached is not correct
- 2 the application form or supporting documents provided do not include a proposed quantity of seaweed for harvesting at each individual area
- 3 the number of individual areas is not clear – is it 5 , 3 or 2?
  - (a) some of the ITM coordinates in 2.3 of the application form are a digit short
  - (b) site location maps referred to at 3.1 of the application form are not provided
  - (c) the screening statement for AA 2021 refers only to the Easkey area– not Raghly or Lislary
  - (d) the 2 foreshore maps provided (Area A and Area B) are out of date historic maps and are located at Easkey area only.

Could you clarify these matters for us?

Regards

Paul O'Sullivan

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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphost seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.