



Licence Ref: MUL240002

(Please quote in all related correspondence)

25 February 2026

Maritime Area Regulatory Authority
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Drinagh
Wexford
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Via: licence@mara.gov.ie

Referral under Regulation 42(6) of the European Communities (Birds and Natural Habitats) Regulations 2011

Re: Maritime usage licence application for the hand harvesting of seaweed *Ascophyllum nodosum* from the intertidal shoreline at Dungloe Bay, Mulroy Bay and Trawbreaga Bay, Co. Donegal.

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I refer to correspondence on 5 December 2025 received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage has reviewed the Supporting Information for Screening for Appropriate Assessment (SISAA) submitted in support of Maritime Usage Licence (MUL) applications for the proposed hand-harvesting of *Ascophyllum nodosum* within Trawbreaga Bay, Rutland Island and Sound/Dungloe Bay, and Mulroy Bay, Co. Donegal. While the SISAA documentation provides a description of the proposed harvesting activities and outlines a



number of operational measures intended to minimise environmental impacts, the National Parks and Wildlife Service considers that there are significant deficiencies in the assessment which limit the ability to rely on the conclusions reached at screening stage. In particular, the National Parks and Wildlife Service considers the information provided does not allow the Competent Authority to exclude, with the necessary level of scientific certainty, the potential for adverse effects on the integrity of the relevant European sites. The National Parks and Wildlife Service therefore advises that further information should be sought to inform the Appropriate Assessment process, and specifically notes the following issues:

1. The assessment does not systematically evaluate potential effects against the site-specific conservation objectives of the relevant European sites, particularly in respect of Annex I habitat 1170 (Reefs) and, where relevant, Annex I habitat 1160 (Large shallow inlets and bays).
2. Interactions with qualifying interests are described largely in general terms, without a clear, feature-by-feature assessment of whether the proposed activities could undermine habitat structure, function, or supporting ecological processes.
3. The SISAA relies heavily on assumed recovery rates and resilience of *Ascophyllum*-dominated intertidal reef communities, citing generic regrowth periods, without demonstrating that these assumptions are applicable to:
 - a) The site-specific environmental conditions present within each bay; or
 - b) Repeated harvesting pressure over multiple years at the proposed scales.
4. There is no baseline assessment of habitat condition for the reef areas proposed for harvesting, limiting the ability to assess whether cumulative biomass removal could result in a gradual decline in habitat condition or function.
5. The assessment areas are described at a very broad scale, but the SISAA does not provide:
 - a) Spatially explicit mapping of harvesting locations in relation to the distribution of Annex I habitats; or
 - b) Clear differentiation between reef areas of differing exposure, community composition, or conservation sensitivity.
6. Without this spatial resolution, it is not possible to verify that more sensitive or less resilient reef features will be consistently avoided.



7. Reference is made to disturbance limits and biomass thresholds; however:
 - a) These thresholds are not clearly derived from conservation objectives or site-specific evidence, and
 - b) It is not demonstrated how compliance with such limits ensures the maintenance of habitat structure and function.

8. Potential disturbance to Annex II species (notably harbour seal) and Special Protection Area bird interests is addressed primarily through avoidance statements. While one assessment acknowledges potential for significant effects, the ecological implications of repeated or chronic disturbance, including displacement or habitat abandonment, are not consistently or adequately assessed across all three bays.

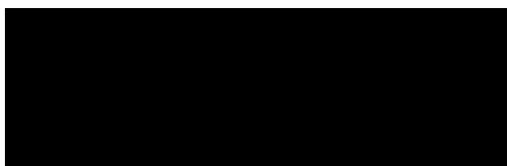
9. Although monitoring is proposed, the SISAA does not clearly specify:
 - a) Measurable indicators linked to conservation objectives;
 - b) Thresholds that would trigger management responses; or
 - c) How monitoring results would be used to inform adaptive management or reassessment of impacts over time.
 - d) As presented, monitoring is largely operational rather than impact-focused.

10. The in-combination assessment is largely qualitative and does not adequately consider:
 - a) Existing traditional seaweed harvesting pressure;
 - b) Other shoreline or marine activities, including aquaculture at the required scientific detail; or
 - c) The potential for incremental or chronic disturbance at bay-wide scale.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) fem.dau@npws.gov.ie, or to the following address:

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Administration