



Licence Ref: **MUL240043**

(Please quote in all related correspondence)

27th February 2026

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Via email: licence@mara.gov.ie

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

Re: Maritime usage licence application for seaweed harvesting at Clew Bay, Co. Mayo.

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I refer to correspondence received in connection with the above. Outlined below are heritage related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading(s).

Nature Conservation

NPWS has reviewed the Natura Impact Statement (NIS) submitted in support of the proposed hand-harvesting of *Ascophyllum nodosum* within Clew Bay. While the NIS provides a general description of the activity and outlines a number of proposed management measures, NPWS considers that there are significant deficiencies which limit the ability to rely on the conclusions of no adverse effects on the integrity of the Clew Bay Complex SAC. NPWS would request that the Competent Authority should seek further information to inform the application and specifically address the following:

- The assessment does not systematically assess effects against the site-specific conservation objectives for relevant qualifying interests, in particular Annex I habitat 1170 (Reefs) and 1160 (Large shallow inlets and bays).
- Interactions are described in general terms, but there is no clear, objective-by-objective analysis of whether the proposed activity could undermine habitat structure, function, or supporting processes.

- The NIS relies heavily on assumed recovery rates and resilience of *Ascophyllum*-dominated reef communities, citing generic regrowth periods (e.g. 3–5 years) without demonstrating that these are applicable to:
 - Site-specific environmental conditions in Clew Bay, or
 - Repeated harvesting pressure over multiple years.
- There is no baseline habitat condition assessment for harvested reefs, making it difficult to assess whether cumulative biomass removal could result in a gradual degradation of habitat condition.
- The assessment area is described at a broad scale, but the NIS does not provide:
 - Mapped extent of harvesting locations relative to Annex I habitat distribution, or
 - Clear differentiation between reefs of differing exposure, community composition, or conservation sensitivity.
- Without this spatial resolution, it is not possible to verify that harvesting will consistently avoid more sensitive or less resilient reef features.
- Reference is made to disturbance limits (e.g. percentages of biomass or “continuous disturbance”), but:
 - These thresholds are not clearly derived from conservation objectives or site-specific evidence, and
 - It is not demonstrated how compliance with these limits ensures that habitat structure and function are maintained.
 - It should also be noted that a quoted interaction of 15% with conservation features is only applicable to sedimentary habitats. Rocky shore habitats are not part of this framework.
- The relationship between biomass removal and functional attributes of reef habitats (e.g. canopy cover, associated fauna, ecosystem processes) is not adequately addressed.
- Potential disturbance to marine mammals, birds, and otter is addressed largely through avoidance statements rather than evidence-based assessment. Seasonal and spatial restrictions are referenced, but:
 - The ecological rationale for these restrictions is not clearly set out, and
 - It is unclear how adherence will be monitored or enforced in practice.



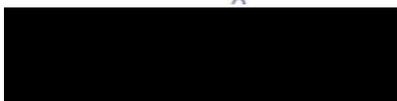
- While monitoring is proposed, the NIS does not clearly specify:
 - Measurable indicators linked to conservation objectives,
 - Thresholds that would trigger management responses, or
 - How monitoring results will be used to reassess impacts over time.
- As presented, monitoring appears more operational than impact-focused, limiting its usefulness in an Appropriate Assessment context.
- The in-combination assessment is largely qualitative and does not adequately consider:
 - Existing traditional seaweed harvesting pressure,
 - Other shoreline activities within the SAC, or
 - The potential for incremental or chronic disturbance at bay-wide scale.
- There is insufficient analysis of whether repeated low-level impacts could, in combination, affect site integrity.

The Department concurs that the proposed site investigation works, either alone or in combination with other plans or projects, are not likely to have a significant effect on any European site.

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

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