

FEAS Observations on MUL240043 – Clew Bay, Seaweed Harvesting, BioAtlantis.

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Summary

- Fisheries Ecosystems Advisory Services (FEAS) Marine Institute, were asked by DAFM for observations on MUL240043, an application for a foreshore licence, transferred to MARA and designation as a MUL, submitted by BioAtlantis for the purpose of seaweed harvesting in Clew Bay, County Mayo.
- The following response is with consideration of potential impacts on sea fisheries and the seafood sector, including aquaculture.
- The application is for a license to hand harvest *Ascophyllum nodosum* seaweed in Clew Bay. Initially submitted in 2014 (ref: FS006269) this application is updated to reflect issues raised by various stakeholders, the details of which are itemised in the application.
- The proposed harvest area covers approximately the inner third of Clew Bay, from Bertra Beach on the south shoreline, north-northeast to Rosmurrevagh Sand Dunes on the north shore and the bay into the east. Within this are three areas designated “no take”, including:
 - Burrishoole estuary/river
 - three shallows around the islands Inishdeashmore and Inishdeashbeg
 - a series of approx. 15 areas around Green island/ Stony Island to the south of Carrowcally.
- The Assessment of *A. nodosum* resources and associated biodiversity in Clew Bay SAC (Appendix 1 in the submitted reports) is dated November 2014 and reporting on data gathered in September 2013 and based on previous work in 1998 and 2001. An Assessment of “Algal harvesting in Clew Bay: pre-license survey, April – July 2016” is now approaching 10 years ago.
This is of concern. Since 2013 / 2016 *Ascophyllum nodosum* abundance may have varied. As a littoral species, potential impact on biodiversity in the littoral zone of harvesting cannot be estimated.
- 57 Licensed Aquaculture Sites fall within the proposed harvest area, with Clew bay a designated Shellfish Water Directive Area¹. Consultation with local licensed aquaculture operators is recommended.
- A fisheries order is in place: European Flat Oyster¹ and consultation with the local co-operative is recommended.
- Clew bay is designated a Special Area of Conservation¹.
- Salmon are also present in the area, both wild and hatchery reared, migrating out of and returning to the Burrishoole river system. Other diadromous species are also prevalent in the area, namely trout and eel.

¹ <https://dafm-maps.marine.ie/aquaculture-viewer/>

- Some of the zone marked for harvesting are subject to considerable coastal erosion – does removal of *Ascophyllum* allow more wave action on the intertidal zone and therefore potentially contribute to further erosion?
- While fishing operations are recorded in the area (periwinkle harvesting, dredge fishing, pot fishing) and within close proximity (net and line fishing) along with spawning and/or nursery grounds for cod and horse mackerel², the littoral distribution of *A. nodosum* tends to be shallow and therefore the impact on fishing activities is likely to be minimal.
- In general, and particularly where the proposed activities occur within Natura 2000 sites, it should also be verified that the particular activity complies with regulations that will safeguard the ecological integrity of the proposed site in view of the site's conservation objectives under Article 6(3) of the Habitats Directive and also have regard to the requirements of the Environmental Impact Assessment Directive. The activity must also be deemed to be in the public interest.
- Potential impact on individuals who have the right to harvest wild seaweed, namely those who hold *appurtenant rights* and *profite-a-prendre* rights, should be assessed.

² 2014 – 2018; Ireland's Marine Atlas: <https://atlas.marine.ie>