



27th February 2025

licence@mara.gov.ie

RE: Maritime Usage Licence Application - Reference MUL250011

A Chara,

The Marine Divisions of the Department of Agriculture, Food and the Marine (DAFM) welcome the opportunity to provide comments on the application by BioAtlantis Ltd. for a Maritime Usage Licence to sustainably hand harvest *Ascophyllum Nodosum* seaweed in Kenmare Bay.

It is essential that the sea-fishing and aquaculture sectors are fully recognised and given a high priority as a long-standing, pre-existing, and traditional activity in the marine environment as the proposed harvesting of seaweed resources is being evaluated.

Fishers and aquaculture site holders are primary food producers dependent upon certain marine areas which are particularly important for food production. This primary production is critical to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities. The importance of these primary and secondary food production activities is reflected in the Government's Food Vision 2030 policy.

The seafood sector, including fishing, aquaculture, processing and ancillary support services, is an important source of employment in rural and coastal areas. BIM's [Business of Seafood 2024](#) report outlines that approximately 16,874 jobs (direct and indirect employment) are reliant on the seafood sector. The sector supports economic activity in peripheral coastal communities right around our coast.

To inform the DAFM comments, the observations of the Marine Institute (MI), Bord Iascaigh Mhara (BIM) and Sea Fisheries Protection Authority (SFPA) on the application were requested.

BIM advised that they promote sustainable management of environmental resources and the use of best practices. Due to overlaps, the proposed hand harvesting seaweed activity would need to be compatible with existing active licensed aquaculture and inshore fisheries activities within the sought application area.

The MI note that it is likely that the proposed harvest rates are sustainable based on historic harvesting, however without any in-situ area specific estimates of *Ascophyllum nodosum* productivity this cannot be definitively stated. DAFM would highlight the MI statement that the age of the scientific assessment is of concern.

The SFPA requests that consideration is given to existing fishing activities, and that foreshore routeways always remain unrestricted with seaweed harvesting restricted to the intertidal

Oifigí an Rialtais, An tIonad Náisiúnta Bia Mara, An Cloichín, Cloich na Coillte, Co. Chorcaí, P85 TX47.

Government Buildings, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85 TX47

T +353 (0)23 8859500

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zone to avoid spatial conflict. Seaweed harvesting must be conducted in a sustainable and supervised manner to maintain the marine ecosystem of juvenile fish and crustaceans.

DAFM recognises that the applicant's aim is to promote co-existence and minimise potential disruption to commercial fishing activities in the area. The evaluation of potential impacts of seaweed harvesting on commercial sea fishing activities needs to be given consideration within the context of the requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework (NMPF).

The principles in the NMPF of avoiding, minimising, or mitigating impacts on access to existing activities (including specific policies on Fisheries and Aquaculture) should be followed and any proposed activity should incorporate the principle of maximising coexistence with established activities in marine areas.

Vessel Monitoring System (VMS) data regarding fishing in, and around, the licence application area may be limited as many of the vessels in the inshore fishing segment (less than 12 metres in length) are not currently required to carry VMS on board. While the proposed activity is not anticipated to impact unduly on inshore fishers, relevant local fishing organisations should nevertheless be engaged with at the earliest opportunity to avoid disruption, spatial conflict, and potential displacement.

Organisations representing inshore vessels include:

- The National Inshore Fisheries Forum (NIFF): <https://inshoreforums.ie/niff/>
- The Irish Islands Marine Resource Organisation (IIMRO): <https://www.iimro.org/>
- The National Inshore Fishermen's Association (NIFA): <https://inshore.ie/>
- South West Regional Inshore Fisheries Forum (SWRIFF): <https://inshoreforums.ie/south-west-overview/>

All relevant fishing organisations should receive any applicable Marine Notice/s, and be made aware of any proposed harvesting activities, at the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible.

Please also find attached documents from the MI and the SFPA which provide further comments for consideration.

Yours sincerely,

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine

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