



License Application for sustainable hand-harvesting of *Ascophyllum nodosum* in Kenmare Bay

**Response to non-statutory consultation with relevant
public bodies from 05/12/2025 to 27/02/2026
(Ref: MUL250011)**

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1. Introduction:

On the 5th of December 2025, the Maritime Area Regulatory Authority (MARA) issued a non-statutory consultation notice to relevant public bodies in relation to Maritime Usage Licence Application Reference MUL250011, submitted by BioAtlantis Ltd. The application is for a Maritime Usage Licence under Section 117 of the Maritime Area Planning Act 2021 (as amended) (the MAP Act) to undertake the sustainable hand harvesting of *Ascophyllum nodosum* within Kenmare Bay.

A number of observations were subsequently received from public bodies and made available to BioAtlantis Ltd. for review and consideration. This document provides BioAtlantis Ltd.'s response to those observations and identifies, where relevant, amendments, clarifications and additional information incorporated into the application documentation.

The responses set out in this document should be read in conjunction with the Maritime Usage Licence application, including the project Proposal Document, Assessment of the Impact of Maritime Usage (AIMU) report, Natura Impact Statement (NIS), Code of Practice and associated appendices (including Appendices 4, 5 and 6). Where amendments have been made to the application documentation in response to particular observations received, these are identified within the relevant sections of this document.

The table in the following section presents the observations received from each public body, together with BioAtlantis Ltd.'s response and references to the relevant application documents where applicable.

2. Summary of Public Body Observations and Applicant Responses

Public Body (comment no.)	Comment by Public Body	Response to Public Body
NPWS 1	Mapping and quantification of harvesting areas in relation to Annex I habitats [1160] Large Shallow Inlets and Bays and [1170] Reefs, including the proportion of each habitat affected within the SAC	Changes to NIS: Additional GIS mapping has been provided showing the proposed harvesting areas in relation to the mapped Annex I habitats/marine community types. The associated quantitative assessment has been consolidated in Section 6.1.11 and Figure 19, including the maximum annual area and proportion of the relevant habitat/community types potentially affected.
NPWS 2	Clarification of how the annual harvest limit (1,826 wet tonnes) will be distributed spatially and temporally, including maximum harvesting frequency per shoreline section and enforcement of recovery periods	Changes to NIS: Section 6.3 describes the annual operational allocation of harvesting between defined sub-sites, harvesting records and traceability, the 20% per-site annual biomass limit, harvesting frequency and applicable fallowing periods. It also explains how site inspections, the resource database and, where relevant, findings from periodic ecological recovery monitoring at representative locations inform re-harvesting decisions. Compliance with the applicable fallowing periods is monitored through the harvesting database, GRNs and Site Inspection Forms. Any non-compliance is addressed through the Code of Practice and Non-Conformance Report procedure.
NPWS 3	Site-specific baseline information for <i>Ascophyllum nodosum</i> within proposed harvesting areas, or justification for the applicability of literature-based recovery assumptions to Kenmare Bay	Changes to NIS: Section 4.1.4 explains the relevance and limitations of the published recovery literature and describes the periodic recovery monitoring at representative locations within selected harvesting areas in Kenmare Bay. Information recorded at those representative locations will provide a baseline against which subsequent recovery can be assessed.
NPWS 4	Further detail on assessment and management of disturbance risk to Common Seal (<i>Phoca vitulina</i>) and Otter (<i>Lutra lutra</i>), including defined seasonal restrictions and triggers for cessation of activity	Changes to NIS: Section 6.4 consolidates the existing spatial and seasonal restrictions and provides explicit operational cessation triggers where sensitive sites or disturbance responses are identified during harvesting.
NPWS 5	A detailed biosecurity protocol, including cleaning procedures, compliance checks, and contingency measures for invasive non-native species.	Changes to NIS: Section 6.5 summarises the project biosecurity requirements. A detailed Biosecurity Protocol is provided in Appendix 12 to the Proposal Document, with relevant biosecurity requirements also incorporated into the BioAtlantis Code of Practice. The protocol sets out cleaning requirements for boats, bags and nets, responsibility for compliance checks, record keeping and the response to a suspected invasive non-native species occurrence.
NPWS 6	A concise monitoring framework specifying indicators, reporting frequency, thresholds for	Changes to NIS: Section 6.6 contains a consolidated ecological monitoring and adaptive management framework. This identifies the parameters to be monitored, monitoring and reporting requirements, management triggers and adaptive-management responses.

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	action, and mechanisms for adaptive management	
NPWS 7	Further clarification of cumulative effects with other activities within the SAC, including aquaculture, recreation, and other seaweed harvesting.	Changes to NIS: Section 5.2.8 has been expanded to summarise the detailed cumulative and in-combination assessment contained in Appendix 7, with particular consideration of activities capable of acting on the same intertidal habitats, species or ecological processes as the proposed harvesting.
Marine Institute 1	Harvesting operations are not likely to impact fishing activities, fish biology or aquaculture activities. There are 43 licensed Aquaculture activities in close proximity and consultation with local licensed aquaculture operators is recommended, Shellfish Water Directive areas present in all three areas.	The following text has been added to the NIS and Section 8.3 of the AIMU report for clarification purposes: Interaction with Licensed Aquaculture Activities: The application recognizes that a number of licensed aquaculture sites are located within the proposed harvest area, with a number of designated Shellfish Water Directive Areas present (e.g. Kenmare River/Sneem/Ardgroom Shellfish Area and Kilmakillloge Harbour Shellfish Area). The assessment presented in Appendix 7 confirms that the proposed activity is compatible with existing aquaculture operations, with mitigation measures in place in the Code of Practice (Appendix 4) to avoid potential impacts. BioAtlantis will consult with local stakeholders to avoid and minimise any potential interactions.
Marine Institute 2	SACs and SPAs are present in all three areas. 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.	• Natura Impact Statement (NIS): An NIS was prepared, and compliance with Article 6(3) of the Habitats Directive (no adverse effect on site integrity) has been demonstrated. • Compliance with Environmental Impact Assessment (EIA) requirements (where applicable): The application has considered the requirements of the Environmental Impact Assessment Directive. As set out in the application (Section 1.8 and Section 5.1), the proposed activity does not constitute a 'project' or 'development' for the purposes of the EIA Directive, and therefore an EIA/EIS is not required." • Activity justified as being in the public interest: As outlined throughout the application, the proposed activity is considered to be in the public interest, as it supports sustainable economic development and employment in coastal communities, enables value to be added to Ireland's indigenous seaweed resource within Ireland rather than being exported as an unprocessed or minimally processed raw material, contributes to national policy objectives including the Blue Bioeconomy and climate action, ensures the sustainable management of a renewable marine resource, and delivers wider environmental and societal benefits through the development of sustainable agricultural technologies.
Marine Institute 3	Fishing activities are recorded in close proximity, however owing to the littoral nature of <i>A. nodosum</i> these are unlikely to be effected.	Fishing activities in the area are addressed throughout the application (e.g. Appendix 7, 10 and 11). Hand harvesting is considered compatible with fisheries activities, and in combination or

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		cumulative effects and other impacts are unlikely to occur. In addition, the Code of Practice includes measures to ensure that no impacts arise on angling and fisheries activities.
Marine Institute 4	Likewise, spawning and nursery grounds of commercial important fish species, close to the proposed harvest areas, are not likely to [be] effected.	As above for MI 3.
Marine Institute 5	Estimate of abundance are somewhat dated: "According to a study by the Marine Institute, Ireland has the potential to sustainably yield in excess of 74,000 tonnes (T) of <i>A. nodosum</i> per annum (Hession C, et al., 1998). However, the annualized potential yield has been under-harvested (<30,000 tonnes is estimated to be harvested per annum) and the true potential of <i>A. nodosum</i> as a renewable resource in Ireland has not been realized. The majority of these resources are found in Galway, Mayo and Donegal and it has been estimated that ~70,500 potential wet tonnes per annum may be harvested sustainably from these areas. Estimates by Hession C, et al., (1998) indicate that there are significant levels of <i>A. nodosum</i> in Kerry, with estimates of approximately 1,160 sustainable tonnes along the coastline of Kenmare Bay (excluding the islands). The application proposes a developmental phase which will incorporate site visits to ascertain abundance of <i>Ascophyllum nodosum</i> in known areas and identify further areas. The submitted material indicates towards use of satellite photography and GIS to determine the available biomass, however on inspection (in the Natura Impact Statement) this appears to be estimation on potential harvest area, assuming	The following text has been added the NIS and Section 2.3.1.2 of the AIMU report and Proposal document, for clarification purposes: <i>"A. nodosum Abundance, Productivity, Regeneration and Littoral Biodiversity:</i> <i>A. nodosum resources in Kenmare Bay were initially assessed based on a study by the Marine Institute (Hession et al., 1998) and subsequent work presented in the main proposal document of this application. Figures reported by the Hession study and other sources have been evaluated in the context of comparable applications, including A. nodosum harvesting proposals in Clew Bay (ref: MUL240043), and were found to be relatively similar overall to in-situ area-specific estimates. As outlined in Section 2.2.2 of the proposal document, sites in Kenmare Bay will be visited with the objective of verifying levels of A. nodosum at different locations. Section 2.3.2 (b) (ii) "Monitoring of the A. nodosum resource: initial and continual assessments", also outlines that initial assessments will be conducted to verify the levels of biomass at each site prior to conducting harvesting. These assessments will also assist in verifying the productivity and sustainable yield potential of A. nodosum within the harvest areas.</i> <i>A. nodosum is a renewable resource with documented regeneration rates (typically 11–17 months in the west of Ireland; Kelly et al., 2001). BioAtlantis will undertake on-site assessments and periodic recovery monitoring at representative locations to inform re-harvesting decisions and following periods, and will update the harvesting plan as necessary based on the results of these assessments.</i> <i>The potential impacts of hand harvesting have been considered in the application, and measures are in place in the Code of Practice (Appendix 4) to prevent impacts on community structure and biodiversity in the A. nodosum zone. As outlined in this application, BioAtlantis will build on the findings of Kelly et al., (2001) and over the life-time of the licence will assess rates of re-growth of A. nodosum post-harvest and associated biodiversity (see Section 2.3.2 (d) of the application proposal document). This approach will build on existing data and knowledge from previous surveys and studies on an ongoing basis throughout the lifetime of the licence".</i>

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	presence/abundance/productivity of <i>A. nodosum</i> with limited in-situ observations. It is likely that the proposed harvest rates are sustainable based on historic harvesting, however without any in-situ area specific estimates of <i>Ascophyllum nodosum</i> productivity this cannot be definitively stated. This is of concern. Since 1998, <i>Ascophyllum nodosum</i> abundance may have varied. As a littoral species, potential impact on biodiversity in the littoral zone of harvesting cannot be estimated.	
SPFA 1	Possible impacts, if any, on existing wild fisheries in the area, with an emphasis on the possible implications for the SPFA in conducting official controls and possible noncompliance issues that could arise. • Potential spatial conflict with traditional and local fishing activities in the area particularly in respect of pot fisheries for shrimp, crab and lobster. • Potential ecological damage to marine habitats of juvenile fish and crustaceans on which commercial fisheries are based. Consideration should be given to stipulating that existing fishing activities and foreshore routeways remain unrestricted at all times with seaweed harvesting restricted to the intertidal zone (area between high water and low water mark) to avoid spatial conflict with existing wild fisheries in the area and that seaweed harvesting is required to be conducted in a sustainable and supervised manner so as to maintain the marine ecosystem of juvenile fish and crustaceans.	• Possible Impacts on Existing Wild Fisheries in the Area Existing wild fisheries and fishing activities in the area are addressed throughout the application (e.g. Appendix 7, 10 and 11). Hand harvesting is considered compatible with wild fisheries activities, and in combination or cumulative effects and other impacts are unlikely to occur. The Marine Institutes submission in relation to this application states the following: - <i>“Harvesting operations are not likely to impact fishing activities, fish biology or aquaculture activities”.</i> - <i>“Fishing activities are recorded in close proximity, however owing to the littoral nature of A. nodosum these are unlikely to effected”</i> - <i>“Likewise, spawning and nursery grounds of commercial important fish species, close to the proposed harvest areas, are not likely to effected”.</i> In addition, the Code of Practice (“Part 10: Angling and fisheries activities”, Appendix 4 of the application) includes measures to ensure that no impacts arise on angling and fisheries activities. • Potential spatial conflict with traditional and local fishing activities in the area, particularly in respect of pot fisheries for shrimp, crab and lobster Given the intertidal nature of hand harvesting, hand harvesting activities are not likely to impact of conflict with local fisheries activities, particularly in respect of pot fisheries for shrimp, crab and lobster. Specific measures are included in Part 10 of the Code of Practice to ensure seaweed harvesting may only take place in the intertidal <i>A. nodosum</i> zone and not in subtidal areas of relevance to fisheries activities such as potting (lobster, crab, shrimp,

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		whelk, nephrops), dredging (e.g. scallop, native oyster, cockle), trammel net fishing for bait, otter trawl, tangle net (crayfish), gillnet, Mid-water trawl. In addition, Appendix 11 provides an assessment of the application to hand harvest <i>A. nodosum</i>, and its consistency with the National Marine Planning Framework (NMPF) and Marine Spatial Planning (MSP) policies, particularly with regard to: Fisheries Policy, Fisheries – effort, Fisheries species and Fisheries - Ports, harvesting, distribution. The text below has also been added to Section 8.4 of the AIMU report, for clarification purposes. The associated ecological and in-combination considerations are addressed in Section 5.2.8 of the NIS and in the detailed assessment presented in Appendix 7: <i>“Coexistence with Sea Fishing and Aquaculture as Established Marine Uses</i> <i>The application has been developed on the basis of the sustainable management of natural and renewable environmental resources and the use of best practice. As outlined in the application documents, sea-fishing, inshore fisheries, and aquaculture are recognised and given a high priority as long-standing, pre-existing, and traditional activities within the marine environment. The proposal has been designed to operate on the principle of maximising coexistence with these and other established activities, in accordance with the National Marine Planning Framework (NMPF), including the principles of avoiding, minimising, and mitigating impacts on access to existing marine users (see Appendix 11).</i> <i>The assessment of in-combination and cumulative effects presented in Appendix 7 confirms that no significant adverse effects arise in relation to existing licensed aquaculture, inshore fisheries, and sea-fishing activities, and demonstrates that the proposal is compatible with these activities. Mitigation measures have also been incorporated to avoid potential interactions, impacts, or in-combination or cumulative effects with these and other activities in the area (see Appendix 4).”</i> ● Potential ecological damage to marine habitats of juvenile fish and crustaceans on which commercial fisheries are base, and maintenance of the marine ecosystem of juvenile fish and crustaceans.

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		As outlined above, hand harvesting is considered compatible with wild fisheries activities, and in combination or cumulative effects and other impacts are unlikely to occur. The Marine Institutes submission in relation to this application states the following: - <i>“Harvesting operations are not likely to impact fishing activities, fish biology or aquaculture activities”.</i> - <i>“Fishing activities are recorded in close proximity, however owing to the littoral nature of A. nodosum these are unlikely to effected”</i> - <i>“Likewise, spawning and nursery grounds of commercial important fish species, close to the proposed harvest areas, are not likely to [be] effected”.</i> The proposed sustainable hand harvesting of <i>A. nodosum</i> is not expected to negatively impact on marine habitats of relevance to juvenile fish and crustaceans on which commercial fisheries are based. Appendix 10 of the application provides an assessment of fish, crustaceans and shellfish of commercial relevance in Kenmare Bay and demonstrates that commercially relevant species are not dependent on the intertidal <i>A. nodosum</i> zone during early life stages. Harvesting activities are confined to the intertidal <i>A. nodosum</i> zone and do not extend into subtidal nursery, spawning or feeding habitats of relevance to commercial fisheries species. Part 10 of the Code of Practice includes measures to avoid interactions with non-<i>A. nodosum</i> habitats which represent the broader habitat range of fish, shellfish, crustaceans and fisheries species during adult and early-life stages, including the following: - <i>“Seaweed harvesting may only take place in the intertidal A. nodosum zone and not in subtidal areas of relevance to fisheries activities such as potting (lobster, crab, shrimp, whelk, nephrops), dredging (e.g. scallop, native oyster, cockle), trammel net fishing for bait, otter trawl, tangle net (crayfish), gillnet, Mid-water trawl. Activities in subtidal waters that are permitted include site visits, inspections, surveys, collection of harvested seaweed, transport and transfer to pick up points.</i> - <i>Avoid interactions with non-A. nodosum habitats which represent the broader habitat range of fish, shellfish, invertebrates and fisheries species during adult and early-life stages, including: deep water areas, seagrass, estuarine mud areas, saltmarsh, lagoons, maerl, subtidal gravel/coarse bottom, subtidal soft bottom areas, intertidal soft bottom areas and exposed shores”.</i>

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		In addition, harvesting is undertaken using low-impact hand harvesting methods and is subject to sustainability controls, including limits on harvest intensity, retention of canopy coverage, holdfast protection, fallowing measures, environmentally safe navigation measures and controls on trampling and disturbance. These measures are intended to maintain the structure and function of the intertidal habitat and minimise potential impacts on associated species and ecological communities. Existing Fishing Activities and Foreshore Routeways Remain Unrestricted at All Times The application has been designed to ensure that existing fishing activities and foreshore routeways are not restricted by harvesting activities. In particular Part 10 of the Code of Practice submitted with this application “Angling and fisheries activities” includes the following measures: <i>“Part 10: Angling and fisheries activities:</i> <i>- There are several sites of relevance to fisheries and sea angling in Kenmare River SAC. Harvesters must work to ensure that the space of fishermen and sea angler’s is respected at all times.</i> <i>- Ensure that the space of recreational/shore anglers is respected, particularly when competitions and festivals take place, particularly during summer months.</i> <i>- Seaweed harvesting may only take place in the intertidal A. nodosum zone and not in subtidal areas of relevance to fisheries activities such as potting (lobster, crab, shrimp, whelk, nephrops), dredging (e.g. scallop, native oyster, cockle), trammel net fishing for bait, otter trawl, tangle net (crayfish), gillnet, Mid-water trawl. Activities in subtidal waters that are permitted include site visits, inspections, surveys, collection of harvested seaweed, transport and transfer to pick up points.</i> <i>- Avoid interactions with non-A. nodosum habitats which represent the broader habitat range of fish, shellfish, invertebrates and fisheries species during adult and early-life stages, including: deep water areas, seagrass, estuarine mud areas, saltmarsh, lagoons, maerl, subtidal gravel/coarse bottom, subtidal soft bottom areas, intertidal soft bottom areas and exposed shores.</i> <i>- Avoid soft substratum areas where bait digging for ragworm/lugworm is observed to be taking place”.</i> In addition, the Code of Practice has been amended to include the following additional mitigation measure: “<i>Ensure that existing fishing activities and foreshore routeways are respected and are not restricted during harvesting and associated activities</i>”.

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		Seaweed Harvesting Restricted to the Intertidal Zone (Area Between High Water and Low Water Mark). Measures are included in the Code of Practice to ensure seaweed harvesting may only take place in the intertidal <i>A. nodosum</i> zone (i.e. Area Between High Water and Low Water Mark), and not in subtidal areas of relevance to fisheries activities. Part 10 of the Code of Practice states the following: <i>“Seaweed harvesting may only take place in the intertidal A. nodosum zone and not in subtidal areas of relevance to fisheries activities such as potting (lobster, crab, shrimp, whelk, nephrops), dredging (e.g. scallop, native oyster, cockle), trammel net fishing for bait, otter trawl, tangle net (crayfish), gillnet, Mid-water trawl. Activities in subtidal waters that are permitted include site visits, inspections, surveys, collection of harvested seaweed, transport and transfer to pick up points”</i>. Avoid Spatial Conflict with Existing Wild Fisheries in the Area As outlined above, measures are in place in the Code of Practice to ensure no spatial conflict with existing wild fisheries in the area. Seaweed Harvesting Conducted in a Sustainable and Supervised Manner The proposed harvesting system has been designed to ensure that <i>A. nodosum</i> is hand harvested in a sustainable manner which minimises and prevents potential effects on marine and coastal species and habitats within Kenmare River SAC, while also supporting sustainable local employment. The Code of Practice has been developed to support these objectives and to ensure that harvesting activities operate in line with the conservation objectives specified for the SAC for a range of Annex I and II habitats and species. Key aspects of the Code of Practice include: - Methods to ensure <i>A. nodosum</i> is harvested in a sustainable manner. - Environmentally safe navigation techniques. - Methods to prevent impacts on relevant wildlife and animal species. - Requirements to prevent interactions, cumulative and in-combination effects. To manage harvesting activities and ensure that harvesting is conducted in a sustainable and supervised manner, BioAtlantis will employ or contract a Resource Manager or Project Manager, preferably with relevant environmental qualifications, a marine ecology background, and/or experience in the fishing or marine resources industry. This individual will work as part of the resource management team and will be responsible for managing activities within the harvesting area and ensuring the sustainability of these activities. The

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		person responsible for assessing recovery post-harvesting will have a marine ecology background. In addition, harvesting activities are subject to environmental protection measures relating to marine habitats, harbour seals, birds, otters, fisheries, aquaculture, navigation, tourism and biosecurity to ensure that they are undertaken in a controlled, supervised and environmentally sustainable manner. Possible implications for the SFPA in conducting official controls and possible non-compliance issues that could arise Hand harvesting of <i>A. nodosum</i> is not expected to give rise to significant implications for the SFPA in conducting official controls, or result in non-compliance issues in relation to existing fisheries activities. Harvesting activities are localised, intertidal, and temporary in nature, and are not expected to interfere with inspections, monitoring, enforcement activities, navigation, or access associated with fisheries management and regulatory oversight. Measures are also included in the Code of Practice to avoid potential congestion at pick-up points and to ensure that the space of other marine and foreshore users is respected. Point 3.14 of the Code of Practice states: <i>“Prevent interactions: Follow pre-planned harvest schedules in order to avoid potential congestion at pick up points such as at piers that may be busy at certain times. Work to ensure that space required by others using piers, harbours, quays or ports is respected.”</i> The Code of Practice also includes measures to ensure that existing fishing activities, aquaculture activities, and foreshore routeways are not restricted by harvesting activities.
SPFA 2	Possible impacts, if any, on adjacent or nearby shellfish production areas adjacent, including possible implications for the SFPA in conducting official controls and possible noncompliance issues that could arise. - Potential spatial conflict with existing aquaculture licensed sites in the area - Potential impacts on aquaculture installations such as trestles, long lines and associated mooring ropes and anchor lines. Potential	Potential spatial conflict with existing aquaculture licensed sites in the area The proposed hand-harvesting activity is compatible with existing aquaculture and inshore fisheries in the area and, as outlined in Appendix 7 of the application, no significant in-combination or cumulative effects arise. Spatial overlap with these activities is limited, and mitigation measures are set out in the Code of Practice (Appendix 4) to avoid potential interactions or impacts. This is further detailed in the responses provided above to similar comments from the Marine Institute and DAFM. Potential impacts on aquaculture installations such as trestles, long lines and associated mooring ropes and anchor lines.

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	obstruction of traditional shore handling areas for live bivalve molluscs with seaweed harvesting equipment and harvested seaweed awaiting transport.	Part 9 of the Code of practice provides mitigation measures to ensure that hand harvest activities do not impact on aquaculture production units or exacerbate any negative effects associated with aquaculture in the SAC. This includes the following specific measure: <i>“Ensure that no aspects of A. nodosum harvesting give rise to any physical interaction or contact with aquaculture production units, their structures or anchors.”</i> To ensure greater clarity in the Code of Practice, the measure has been amended as follows: <i>“Ensure that no aspects of A. nodosum harvesting give rise to any physical interaction or contact with aquaculture production units, <u>including trestles, long lines, mooring ropes, anchor lines and associated</u> structures or anchors”.</i> Potential obstruction of traditional shore handling areas for live bivalve molluscs with seaweed harvesting equipment and harvested seaweed awaiting transport. Potential obstruction of traditional shore handling areas for live bivalve molluscs is addressed through measures included in Section 3.5 (“Health and Safety”), Section 3.14 (“Prevent interactions”) and Part 9 (“Aquaculture”) of the Code of Practice, including requirements relating to the <i>“pick up of bags/nets”, “temporary storage of bags”, to “avoid potential congestion at pick up points such at piers that may be busy at certain times”, to “work to ensure that space required by others using piers, harbours, quays or ports is respected”, and to “not impede workboat or tractor access to aquaculture sites along access routes”.</i>
DAFM 1	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	The text below has been added to Section 8.4 of the AIMU report, for clarification purposes. The associated ecological and in-combination considerations are addressed in Section 5.2.8 of the NIS and in the detailed assessment presented in Appendix 7: <i>“Coexistence with Sea Fishing and Aquaculture as Established Marine Uses</i> <i>The application has been developed on the basis of the sustainable management of natural and renewable environmental resources and the use of best practice. As outlined in the application documents, sea-fishing, inshore fisheries, and aquaculture are recognised and given a high priority as long-standing, pre-existing, and traditional activities within the marine environment. The proposal has been designed to operate on the principle of maximising coexistence with these and other established activities, in accordance with the National Marine Planning Framework (NMPF), including the principles of avoiding, minimising, and mitigating impacts on access to existing marine users (see Appendix 11).</i>

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		<i>The assessment of in-combination and cumulative effects presented in Appendix 7 confirms that no significant adverse effects arise in relation to existing licensed aquaculture, inshore fisheries, and sea-fishing activities, and demonstrates that the proposal is compatible with these activities. Mitigation measures have also been incorporated to avoid potential interactions, impacts, or in-combination or cumulative effects with these and other activities in the area (see Appendix 4)."</i>
DAFM 2	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 licenced aquaculture and inshore fisheries activities within the sought application area.	As above for DAFM 1.
DAFM 3	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 <i>Ascophyllum nodosum</i> productivity this cannot be definitively stated. DAFM would highlight the MI statement that the age of the scientific assessment is of concern	As outlined in response to comments by the Marine institute (see reply to "Marine Institute 5").
DAFM 4	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 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.	The matters raised by DAFM in relation to fisheries, foreshore access, spatial conflict, restriction of harvesting to the intertidal zone, and the sustainable and supervised management of harvesting activities, are addressed in detail in the response to the SFPA submission, as set out above.
DAFM 5	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	As outlined above for DAFM 1. In addition, Appendix 11 provides an assessment of the application to hand harvest <i>A. nodosum</i> , and its consistency with the National Marine Planning Framework (NMPF) and Marine Spatial Planning (MSP) policies, particularly with regard to: Fisheries Policy, Fisheries - effort, Fisheries species and Fisheries - Ports, harvesting, distribution.

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	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).	
DAFM 6	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	As above for DAFM 1.
DAFM 7	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 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/ • North West Regional Inshore Fisheries Forum (NWRIFF): https://inshoreforums.ie/northwest-overview/	As outlined in the application, the proposed activity is compatible with, and is not anticipated to result in significant impacts on inshore fisheries or to cause disruption or displacement of fishing activities. Mitigation measures are set out in the Code of Practice (Appendix 4) to avoid potential impacts, where applicable. BioAtlantis recognises the importance of engagement with local stakeholders such as fishing organisations, and will consult with stakeholders to inform them of the proposed activity, to avoid any potential for disruption or displacement. A Marine Notice will be issued where required, to inform relevant stakeholders to ensure optimum coordination and avoid potential interactions, impacts or disturbances to other marine activities (such as fishing) to the greatest extent possible.
DAFM 8	All relevant fishing organisations should receive any applicable Marine Notice/s, and be made aware of any proposed harvesting activities, at	As above for DAFM 7.

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	the earliest opportunity to ensure the optimum coordination of activities and to limit potential disturbances to fishing activities to the greatest extent possible	
BIM 1	BIM promotes the sustainable management of environmental resources and the use of best practice.	The existing application and Code of Practice reflects best practice and sustainable resource management.
BIM 2	Due to overlaps, the proposed hand harvesting seaweed activity would need to demonstrate that it is compatible with existing active licenced aquaculture and inshore fisheries activities within the application area. Any potential overlap would need to consider in-combination and cumulative effects.	The proposed hand-harvesting activity is compatible with existing aquaculture and inshore fisheries in the area and, as outlined in Appendix 7 of the application, no significant in-combination or cumulative effects arise. Spatial overlap with these activities is limited, and mitigation measures are set out in the Code of Practice (Appendix 4) to avoid potential interactions or impacts. This is further detailed in the responses provided above to similar comments from the Marine Institute and DAFM.
BIM 3	Although BIM has no remit in the hand harvesting of seaweed some of our clients and their communities have strong hand harvesting traditions/rights and the proposed activity would need to be consistent with existing activity.	The application acknowledges existing hand-harvesting traditions/rights in the area and has been designed to operate in a manner consistent with these activities. As outlined in Section 3.5 of the application form, BioAtlantis liaised with the The Property Registration Authority of Ireland (PRAI, now part of Tailte Éireann) to identify the nature and extent of existing seaweed rights within the licence area. Following an in depth examination of Land Registry folios, a number of folios have been identified that specify existing appurtenant rights in relation to the gathering or removal of seaweed in Kenmare Bay. There are also folios containing burdens with seaweed-related rights in certain areas. Folios that refer to seaweed in the license area were identified. This is described in a separate report submitted with the application, along with maps showing the location of these harvesting rights. As outlined in the application, BioAtlantis wish to work in partnership with local hand harvesters in Kenmare Bay to create a vibrant industry, and add value to the seaweed resource in Ireland. The application ensures that traditional seaweed harvesting rights are fully respected and measures are included to ensure the license has no impacts on existing harvesting rights in Kenmare Bay. In particular, BioAtlantis will not harvest in any area where existing appurtenant rights and burdens exist in relation to seaweed, without first obtaining permission from the owner of such rights. See report attached with the application entitled “Assessment of the nature and extent of seaweed harvesting rights in Kenmare Bay”, for further details. Where Profit-à-Prendre rights to harvest seaweed are successfully registered with the PRAI, the harvesting plan will be adjusted to ensure that those individuals can continue to harvest A.

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		<i>nodosum</i> . It is envisaged that a clause will be inserted into the licence that will issue to allow the harvesting of <i>A. nodosum</i> , stating that if a Profit-à Prendre right holder provides sufficient proof of their right, the licensee would be prohibited from harvesting in that area, without first obtaining permission from the owner of such rights.
BIM 4	Demonstrating compliance with sustainable management and best practice is considered important	The application has been developed on the basis of the sustainable management of natural and renewable environmental resources and the use of best practice. This is demonstrated through the inclusion of a Code of Practice (Appendix 4) to guide sustainable hand harvesting activities, the implementation of mitigation measures to avoid potential impacts, and the adoption of an adaptive management approach incorporating ongoing monitoring and site assessments to ensure the long-term sustainability of the resource.
BIM 5	Early and continuous communication should be made with stakeholders in the proposed mapped areas to avoid any conflicts arising with fishermen and aquaculture operators in the areas regarding proposed activities.	BioAtlantis will engage with members of the public through the statutory public consultation process to avoid potential interactions, impacts or conflicts regarding the proposed activity, including those relating to other marine users.
GSI 1	With reference to your emails received on the 9 December 2025, concerning the MUL Applications for Seaweed Harvesting, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' Data & Maps (gsi.ie) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).	• The availability of datasets from the Geological Survey Ireland (GSI) is noted and may be considered where relevant, with appropriate attribution to source data in accordance with GSI guidance. • As outlined in the application form, the proposed activity does not constitute a project for the purposes of the EIA Directive and therefore an Environmental Impact Assessment is not required. This is further detailed in the response to comments from the Marine Institute (see response to Marine institute comment number 8 above).
GSI 2	For specific data available for Environmental Assessment and Planning topics please follow this link [Data by Environmental Assessment and Planning Topic (gsi.ie)], where you will find our data arranged by environmental assessment topic as illustrated below:	As above for GSI 1. In addition: The information and datasets identified by Geological Survey Ireland, including those available through the Marine and Coastal Unit and the INFOMAR programme, have been reviewed. Having regard to the nature, scale and intertidal location of the proposed hand-harvesting activity, these datasets are not considered directly applicable to the proposal and do not give rise to any additional impact pathways. Accordingly, no further assessment is required at this stage.

Public Body (comment no.)	Comment by Public Body	Response to Public Body
	• Land and soils: Soil – Subsoils (Quaternary Geology); Tellus Geochemistry; Geotechnical. Geology – Bedrock; Geophysics; Bedrock & Quaternary 3D. • Water: Groundwater – Aquifers GW vulnerability, GWPSs (GWPPS); Surface water – Tellus Geochemistry; Estuarine & marine waters – Marine and coastal; Flooding – GWClimate; Karst. • Climate Change: Carbon accounting / Carbon balance – Geothermal; Carbon capture and storage. Climate change trends – National coastal change assessment. • Cultural Heritage: Archaeology – Cherish; Underwater Archaeology – Shipwrecks. • Material Assets: Built Services – Natural resources (Minerals & Aggregates); Active quarries. • The Landscape: Landscape Appearance & Character – Physiographic units; Historical landscapes – Historic mines. • Other Relevant Data: Natural (Geo) hazards – Landslide Susceptibility Mapping; Groundwater flooding; Coastal vulnerability; Subsidence; Radon. Natural heritage – Geoheritage (County Geological Sites); Dimension Stone/Stone Built Ireland.	In terms of Cultural Heritage, Appendix 1 of the application form provides a list of archaeological sites in close proximity or within to the license area. As outlined in Appendix 1, in cases where archaeological sites are located on the foreshore, or directly adjacent to the foreshore, such sites will be avoided by a distance of 20 meters. Prior to harvesting, the Resource Manager will mark these sites.
GSI 3	Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders.	As above for GSI 1 and GSI 2. Regarding coastal change and coastal erosion, various sources, including ESA Coastal Erosion from Space, the National Coastal Change Assessment, and the Office of Public Works Irish Coastal Protection Strategy Study (ICPSS) 2050 Erosion Line dataset, www.heritagemaps.ie and https://www.floodinfo.ie/map/coastal_map/, have been consulted. As outlined below, measures have been incorporated into the Code of Practice to ensure that the proposed harvesting will not result in impacts on coastal erosion. The following text has been added to the NIS and Section 3.5.4 of Appendix 5, for clarification purposes: <i>“Potential Effects of Hand Harvesting of A. nodosum on Coastal Erosion and Wave Attenuation</i> <i>(a) Coastal Processes in Kenmare Bay</i>

Public Body (comment no.)	Comment by Public Body	Response to Public Body
	INFOMAR data such as bathymetry, backscatter, sediment classification, shipwrecks and survey metadata can be downloaded free of charge in a variety of formats at the INFOMAR Marine Data Download Portal. INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment. Story maps have also been developed providing a different perspective of some of the bays and harbors of the Irish coastline. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer. The Marine and Coastal Unit also participate in coastal change projects and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found here.	<i>Kenmare Bay is a long, narrow, south-west facing drowned glacial valley approximately 55km in length and up to 12km wide at its mouth. The SAC contains a highly varied coastal environment characterised by exposed rocky coasts, sheltered inlets, estuarine conditions, peat-based saltmarshes, 1220 Perennial vegetation of stony banks systems and localised sand dune systems (NPWS, 2013B). Exposure to prevailing winds and swells decreases progressively towards the inner bay, while numerous islands, coves and sheltered inlets create highly localised sedimentary environments and coastal habitat mosaics.</i> <i>Coastal systems within Kenmare River SAC are naturally dynamic and are subject to ongoing natural coastal processes, including tidal action, sediment transport, erosion, accretion and succession. NPWS conservation objectives recognise that these habitats are naturally dynamic and that targets are assessed subject to natural processes, including erosion and succession (NPWS, 2013B). In contrast to more exposed soft-sediment systems, much of the Kenmare coastline is rocky and structurally stable (NPWS, 2013B).</i> <i>Review of the Office of Public Works (OPW) Irish Coastal Protection Strategy Study (ICPSS) 2050 erosion-line mapping identifies a number of localised erosion-susceptible coastal areas within the Kenmare Bay region, including sections along north-west Kenmare Bay (e.g. near Cove Strand, Castlecove; near Rath Strand; and shoreline sections within Derrynane Bay) and south-west Kenmare Bay (e.g. Ballydonegan Strand and Ballydonegan Quay near Allihies). The mapped erosion lines are generally confined to low-lying beach or sedimentary coastal margins rather than the surrounding rocky coastline (OPW, n.d.).</i> <i>However, certain habitats and localities within the SAC are sensitive to disturbance of sediment dynamics, trampling, peat erosion, shoreline instability and localised erosion processes, particularly within:</i> <i>• Peat-based saltmarsh systems;</i> <i>• 1220 Perennial vegetation of stony banks spits and tombolos;</i> <i>• Dune systems;</i> <i>• Sensitive coastal habitats adjacent to saltmarsh, dune and 1220 Perennial vegetation of stony banks systems; and</i> <i>• Sheltered peat-based saltmarsh systems and soft coastal margins.</i>

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		<i>The NPWS conservation objectives emphasise the importance of maintaining natural sediment circulation, natural hydrological and flooding regimes, and natural coastal functionality throughout the SAC (NPWS, 2013B).</i> (b) Sensitivity of Habitats <i>Saltmarsh, dune and 1220 Perennial vegetation of stony banks habitats within Kenmare River SAC are naturally dynamic systems which rely on natural sediment processes, tidal exchange and shoreline stability (NPWS, 2013B). These habitats may be sensitive to disturbance of sediment supply, vegetation structure, hydrological processes or shoreline integrity. Site-specific sensitivities identified in the NPWS documentation include:</i> <i>• Dereen House: The most extensive salt meadow system within the SAC occurs at Dereen House, where exposed peat and lower saltmarsh areas support turf fucoids characteristic of western Atlantic saltmarsh systems. These peat-based lower marsh areas may be sensitive to physical disturbance and erosion (McCorry and Ryle, 2009; NPWS, 2013B).</i> <i>• West Cove: Saltmarsh development is fragmented and discontinuous, with variable shoreline topography and exposed peat areas. Turf fucoids are also present. The site may be sensitive to trampling, sediment disturbance and peat erosion (McCorry and Ryle, 2009; NPWS, 2013B).</i> <i>• Tahilla: This enclosed bay and lagoon-associated system is hydrologically sensitive and dependent on maintaining natural sediment and tidal processes (NPWS, 2013B).</i> <i>• Dinish: Small areas of saltmarsh occur in association with transitional wet heath, wet grassland and woodland habitats. The shoreline configuration and small scale of the site may increase sensitivity to localised disturbance (NPWS, 2013B).</i> <i>• Derrynane: Sand dune habitats at Derrynane include embryonic dunes, shifting dunes, fixed dunes and humid dune slacks. NPWS identifies these habitats as naturally dynamic and potentially sensitive to recreational pressures, trampling and disturbance of sediment processes (Ryle et al., 2009; NPWS, 2013B).</i> <i>• Rossdohan Island and Pallas Harbour: These 1220 Perennial vegetation of stony banks systems include a well-vegetated spit and tombolo system, respectively, and are dependent on maintaining natural sediment circulation and coastal mobility (NPWS, 2013B).</i> <i>The NPWS conservation objectives emphasise the importance of maintaining natural sediment circulation, shoreline mobility and coastal functionality within 1220 Perennial vegetation of stony banks habitats (NPWS, 2013B).</i> (c) Conservation Context

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		<i>Under the EU Habitats Directive, Kenmare River SAC is designated as a Special Area of Conservation (SAC) supporting a range of coastal habitats, including saltmarsh, 1220 Perennial vegetation of stony banks habitats, dunes and vegetated sea cliffs (NPWS, 2013B). The NPWS conservation objectives for these habitats place particular emphasis on:</i> <i>• maintaining natural sediment circulation;</i> <i>• maintaining natural coastal functionality;</i> <i>• maintaining natural flooding and hydrological regimes;</i> <i>• maintaining habitat zonation and transitional habitats;</i> <i>• avoiding interference with sediment dynamics; and</i> <i>• maintaining habitat extent and distribution, subject to natural erosion and succession.</i> <i>The conservation objectives recognise that erosion, accretion and shoreline mobility are natural components of ecological functioning within these coastal systems (NPWS, 2013B).</i> <i>Ongoing coastal monitoring and management initiatives are being undertaken at Derrynane by statutory authorities and organizations, including the OPW and NPWS, in response to natural coastal erosion and dune mobility (OPW, 2025). Coastal erosion and shoreline vulnerability are also recognised issues along certain shoreline sections at Templenoe. Kerry County Council also identifies coastal erosion and climate-related coastal vulnerability as important environmental and climate adaptation issues within County Kerry (Kerry County Council, 2022).</i> <i>(d) Assessment of Potential Impacts and Mitigation</i> <i>The proposed hand harvesting of A. nodosum is not expected to materially increase wave exposure in the intertidal zone or contribute to coastal erosion, as the activity involves the selective cutting of fronds only, retains the holdfast, maintains sufficient biomass for regeneration, and does not alter the physical processes that control erosion in Kenmare River SAC. A. nodosum grows in naturally sheltered intertidal environments where wave energy is inherently low and therefore has limited influence on coastal hydrodynamics or wave action (NPWS, 2013B). Coastal erosion in these areas is primarily controlled by physical factors such as substrate type and geomorphology, rather than macroalgal cover (NPWS, 2013B; EPA, n.d.). Hand harvesting involves the selective removal of fronds only, with the holdfast remaining intact, allowing for natural regeneration and maintaining biomass along the shoreline. The Code of Practice includes measures to prevent impacts on mudflats, sandflats, intertidal sandy mud, estuarine mud, fine-sand, salt meadow, shingle and reef areas, including adherence to environmentally safe navigation practices and avoiding entry into soft sediment areas during</i>

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		<i>low tide. On this basis, it is considered that the proposed hand harvesting of A. nodosum will not contribute to coastal erosion. This conclusion is supported by the following:</i> <i>• Any potential effects on localised wave attenuation and sediment stabilisation are limited in spatial extent, and do not exert a controlling influence on coastal processes.</i> <i>• Coastal processes in Kenmare River SAC are controlled primarily by geomorphology, tidal dynamics and sediment processes (NPWS, 2013B). Accordingly, the proposed activity does not involve sediment removal or alteration of these processes and therefore will not influence sediment transport pathways or shoreline evolution.</i> <i>• There is no plausible pathway by which the proposed activity, as designed and subject to the proposed mitigation measures, could increase coastal erosion, as it does not alter wave energy, tidal processes, sediment supply or the integrity of stabilising habitats.</i> <i>• The sustainable hand-harvest methodology and rotational nature of harvesting limit reductions in biomass and ensure recovery between harvesting cycles.</i> <i>• Access to sites and harvesting methods are designed to minimise physical disturbance to shoreline sediments and vegetation (e.g. saltmarsh, dunes and 1220 Perennial vegetation of stony banks habitats), thereby avoiding indirect effects on erosion processes.</i> <i>• While coastal wetlands, such as saltmarsh and mudflat habitats, and other intertidal habitats have the potential to contribute to localised coastal resilience, the proposed hand-harvesting activity is designed to be sustainable by retaining sufficient biomass, ensuring regeneration and avoiding adverse effects on sensitive areas, thereby maintaining these functions.</i> <i>• The limited number of personnel operating along the shoreline, together with other measures set out in the application, serves to limit anthropogenic effects and minimise the potential for impacts on shoreline stability and coastal erosion processes.</i> <i>(e) Mitigation Measures to Prevent Coastal Erosion</i> <i>To ensure that no significant impacts on coastal erosion arise, additional mitigation measures are included in the Code of Practice, as outlined below:</i> <i>• Follow environmentally safe navigation practices at all times, including avoiding entry into soft sediment areas during low tide, accessing sites at appropriate tidal states, and minimising contact with the seabed and shoreline (see Section 7: Environmentally Safe Navigation).</i> <i>• Use correct hand-cutting methods at all times, leaving the holdfast intact to facilitate regeneration and retain sufficient seaweed cover.</i> <i>• Adhere to sustainable harvesting practices, biomass limits and harvesting schedules to ensure regeneration and maintenance of biomass levels along the shoreline, and to prevent over-harvesting and any potential indirect impacts on organic drift material.</i>

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		• <i>Activities related to harvesting, such as storage and transport, are not permitted within sand dune, saltmarsh or stony bank areas (Perennial vegetation of stony banks [1220]). Harvesting shall be restricted to the intertidal Ascophyllum nodosum zone.</i> • <i>Do not harvest at the fringes of saltmarsh habitats (e.g. Atlantic salt meadow and Mediterranean salt meadow habitats).</i> • <i>Particular care shall be taken to avoid disturbance of erosion-prone areas within saltmarsh, dune and 1220 Perennial vegetation of stony banks systems, including areas at Dereen House, West Cove, Tahilla, Dinish, Derrynane, Rossdohan Island and Pallas Harbour.</i> • <i>Harvesting shall not occur within erosion-susceptible low-lying beach or sedimentary coastal margins identified through OPW ICPSS erosion-line mapping, specifically shoreline sections at: Cove Strand (Castlecove), Rath Strand, Derrynane Bay, Ballydonegan Strand and Ballydonegan Quay.</i> • <i>Harvesting shall not occur along the identified erosion-sensitive shoreline section at Templenoe.</i> • <i>Harvesting shall not occur at Derrynane, thereby preventing impacts on dune habitats and avoiding disturbance to these systems.</i> • <i>Ensure particular caution in more exposed areas of sites, where natural erosion processes may be more active.</i> • <i>Ensure particular caution when operating near upper shore areas identified as erosion-sensitive through site assessments, harvester training, local guidance, or where there is visual evidence of peat erosion, saltmarsh edge erosion, shoreline instability or sediment instability.</i> • <i>Access routes:</i> - <i>Harvesting activities are confined to the intertidal zone where A. nodosum is present.</i> - <i>Access routes used by harvesters must not traverse or involve trampling across sensitive inland and coastal habitats, and harvesters cannot enter into the following sensitive coastal zones and terrestrial habitats: dune systems (Ammophila arenaria (white dunes) [2120], Fixed coastal dunes with herbaceous vegetation [2130]), saltmarsh areas including those dominated by sea rush (saltmeadow areas; Atlantic salt meadows [1330], Mediterranean salt meadows [1410]), heathland (e.g. European dry heaths [4030]), Juniper scrub zones (Juniperus communis formations [5130]), stony bank areas (Perennial vegetation of stony banks [1220]), sea cliffs (Vegetated sea cliffs [1230]), sea caves (Submerged or partially submerged sea caves [8330]), Calaminarian grasslands [6130], and mined landscapes.</i> - <i>No storage or equipment placement is permitted in heath areas.</i> - <i>Harvesters must avoid trampling of vegetation, especially in soft intertidal areas.</i>

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		- Access to the shore by vehicles is also subject to these control measures in order to protect sensitive areas. - Where appropriate, use signage or local guidance to direct access along durable surfaces. - Harvesters must avoid unnecessary coastal exploration or exploration of unfamiliar shoreline features. (f) Flooding and Coastal Inundation <i>Flooding and coastal inundation are recognised issues in coastal areas. However, A. nodosum is naturally adapted to sheltered intertidal environments where wave energy is inherently low, and therefore has limited influence on broader coastal hydrodynamics or flood processes. The proposed activity involves the selective hand harvesting of fronds only, retains the holdfast and sufficient biomass for regeneration, and does not involve alteration of shoreline morphology, sediment transport processes, hydrology, tidal exchange or coastal defences. No evidence is available to indicate that sustainable hand harvesting of A. nodosum within sheltered intertidal areas contributes to coastal flooding, shoreline inundation or changes in regional hydrodynamic processes. Accordingly, no pathway exists by which the proposed activity could contribute to flooding or coastal inundation.</i> (g) Conclusion <i>Erosion, accretion and shoreline mobility within Kenmare River SAC are natural coastal processes, and certain habitats and locations may be locally sensitive to trampling, sediment disturbance and physical damage. The NPWS conservation objectives require that natural sediment processes, shoreline mobility and habitat functionality are maintained, and that activities do not interfere with sediment dynamics or natural erosion and succession processes (NPWS, 2013B).</i> <i>The proposed hand harvesting of A. nodosum is limited to selective cutting within the intertidal zone, retains the holdfast and sufficient biomass for regeneration, and does not involve alteration of sediment processes, shoreline morphology or hydrology. On this basis, and taking account of the mitigation measures outlined above, it is concluded that the proposed activities will not result in impacts on coastal erosion processes, shoreline stability or sediment dynamics within Kenmare River SAC.</i> (f) References

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		• Environmental Protection Agency (EPA) (n.d.) Coastal erosion. Climate Ireland. https://www.climateireland.ie/impact-on-ireland/climate-hazards/coastal-erosion/ • Evans, T. (2021). One big storm could spell trouble for Templenoe GAA. Irish Independent. Available at: https://www.independent.ie/irish-news/one-big-storm-could-spell-trouble-for-templenoe-gaa/40493069.html • KCC (2022). Kerry County Development Plan 2022–2028. Chapter 11: Environment, Climate Action and the Coast. Available at: https://consult.kerrycoco.ie/ga/consultation/draft-kerry-county-development-plan-2022-2028/chapter/chapter-11-environment • McCorry, M. and Ryle, T. (2009). Saltmarsh Monitoring Project 2007–2008. Unpublished report to NPWS. • NPWS, 2013B. Kenmare River SAC (site code 2158) Conservation objectives supporting document – coastal habitats [Version 1]. • Office of Public Works (OPW) (n.d.). Irish Coastal Protection Strategy Study (ICPSS) Coastal Erosion Mapping Viewer. Available at: https://www.gov.ie/en/office-of-public-works/publications/irish-coastal-protection-strategy-study-icpss/ • Office of Public Works (OPW) (2025). Derrynane Coastal Monitoring Project. Available at https://dunes.ie/ • Ryle, T., Murray, A., Connolly, K. and Swann, M. (2009). Coastal Monitoring Project 2004–2006. Unpublished report to NPWS.”
GSI 4	ObSERVE Programme The ObSERVE Programme is a collaborative initiative between the Department of Climate, Energy and the Environment (DCEE) and the Department of Housing, Local Government and Heritage (DHLGH). Managed by DCEE, the programme delivers aerial and acoustic survey data on marine megafauna — including cetaceans, seabirds and other protected species — to address critical baseline data gaps in Irish waters. These datasets support marine spatial planning, biodiversity conservation, and Ireland’s obligations under EU and international environmental frameworks.	The ObSERVE Programme is acknowledged as a key national dataset providing baseline information on the distribution and occurrence of marine megafauna in Irish waters, including cetaceans, seabirds and other protected species. Many of the species identified within ObSERVE were already considered in the application. The remaining species and groups have been reviewed and incorporated into the assessment where relevant (e.g. see updated Appendix 6, Appendix 5). As the dataset is regional in nature and not necessarily site-specific to Kenmare Bay, and as many species are offshore or pelagic or have no spatial overlap or obligate relationship with <i>A. nodosum</i>, there is limited potential for interaction with the proposed intertidal activities. The conclusions of the environmental assessments remain unchanged. Potential effects on other marine megafauna have been further assessed and incorporated into the updated Appendix 5. To ensure no impacts on marine megafauna, the following additional measures have been included in the Code of Practice in updated Appendix 4: “Part 14: Other requirements:

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		• Other mammalian and large non-mammalian marine fauna: To prevent disturbance the following is required: - Harvesters will be trained to identify presence of marine mammals such as Harbour Porpoise, Grey seals, Dolphins and other cetaceans, and other large non-mammalian marine fauna (such as basking shark and turtles), as part of the general environmental awareness training. - Harvesters must adhere to measures to prevent disturbance of other marine mammals and non-mammalian marine fauna, and steps to record disturbance events (e.g. section 5.4. of Code of Practice). • Training: Harvesters will be provided with training, where necessary, regarding habitat recognition and measures to prevent impacts on marine and coastal habitats and species, including those outlined in the Code of Practice.”
MSO 1	After careful consideration, the Marine Survey Office has no objection to the proposed works from a navigational safety perspective.	No action required.
MSO 2	The Licensee shall ensure all hazards to safe navigation are easily identifiable to all mariners operating within or in the vicinity of the licence area.	No navigation hazards are expected; however, any potential hazards that may arise will be clearly marked and easily identifiable to all mariners operating within or in the vicinity of the licence area.
MSO 3	All buoys deployed must be visible by day and fitted with appropriate lighting during hours of darkness.	The following text has been added to the AIMU report and Proposal document, for clarification purposes:
MSO 4	The marking and lighting of any moored instruments shall be carried out in consultation with the Marine Survey Office and Commissioners of Irish Lights and shall comply with IALA requirements.	“Additional Navigation, Marking and Lighting Measures: • Any buoys deployed will be visible by day and fitted with appropriate lighting during hours of darkness, if applicable. • The proposed activity does not involve the deployment of moored instruments and, accordingly, this requirement is not applicable. However, should such equipment be deployed, it’s the marking and lighting will be carried out in consultation with the Marine Survey Office and the Commissioners of Irish Lights and shall comply with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) requirements. • BioAtlantis will comply with all Irish maritime licensing and certification requirements”.
MSO 5	All vessels engaged in the proposed works must conform to Irish licensing and certification standards and be manned by appropriately qualified personnel.	
CCC	General — Following your letter dated 05-12-2025, Cork County Council, in its capacity as a Coastal Local Authority and a Port Authority for	Responses provided below.

Public Body (comment no.)	Comment by Public Body	Response to Public Body
	part of the proposed licensed area, wishes to exercise its right to make a submission with regards to BioAtlantis Ltd's application for the harvesting of <i>Ascophyllum nodosum</i> in the intertidal shoreline in Kenmare Bay.	
CCC 1.1	General — Confirmation letter from the Department of Agriculture, Food and the Marine that the proposed activity is not subject to Aquaculture (Licence Application) Regulations, 1998, as amended (S.I. No. 236/1998), or to any other Foreshore Regulation or commercial sea-fishing boat licensing regulation.	BioAtlantis notes that the proposed activity relates to the sustainable hand harvesting of <i>Ascophyllum nodosum</i> within the intertidal zone and does not involve aquaculture operations or aquaculture infrastructure. The Department of Agriculture, Food and the Marine has been consulted on this application during the non-statutory public bodies consultation process, and has provided comments. If required, BioAtlantis has no objection to MARA seeking a confirmation letter from the Department of Agriculture, Food and the Marine that the proposed activity is not subject to Aquaculture (Licence Application) Regulations, 1998, as amended (S.I. No. 236/1998), or to any other Foreshore Regulation or commercial sea-fishing boat licensing regulation.
CCC 1.2	General — Confirmation letter from the Sea-Fishery Protection Authority that the proposed activity is compliant with sea-fishing regulation.	The SFPA has been consulted on this application during the non-statutory public bodies consultation process, and has provided comments. If required, BioAtlantis has no objection to MARA seeking a confirmation letter from the Sea-Fishery Protection Authority that the proposed activity is compliant with sea-fishing regulation.
CCC 1.3	General — The Licensee shall conduct their operations in a safe manner and with regard for other persons in the area and the environment and shall ensure that the operations are not injurious to adjacent lands or the public interest (including the environment) and do not interfere with navigation or other lawful activity in the vicinity of the licensed area, and shall comply with any lawful directions issued by the Minister and any other competent State authority in that regard.	BioAtlantis agrees with the principle of including of a condition requiring that operations are conducted in a safe manner, with due regard for other persons in the area, the environment, navigation and other lawful activities. The application documentation, including the Code of Practice (Appendix 4), already contain a range of operational, environmental and safety measures intended to ensure that harvesting activities are undertaken responsibly and in accordance with relevant legislative and environmental requirements. In this regard, the following clarifications and considerations are provided: • Conducting operations in a safe manner: Part 3.5 <i>Health and Safety</i> of the Code of Practice (Appendix 4 of the application) sets out health and safety measures to ensure that harvesters comply with health and safety requirements and relevant maritime legislation during harvesting activities • Having regard for other persons in the area and the environment: Parts 8 <i>Tourism, sport and recreation</i>, Part 9 <i>Aquaculture</i>, and Part 10 <i>Angling and fisheries activities</i> of the Code of Practice (Appendix 4 of the application) contain measures requiring harvesters to respect other users of the area, avoid interference with tourism, aquaculture and fisheries activities, and minimise anthropogenic disturbance within Kenmare River SAC.

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		• Ensuring that operations are not injurious to adjacent lands or the public interest (including the environment): Part 4 <i>Marine and coastal habitats</i>, Part 7 <i>Environmentally safe navigation</i>, and Part 13 <i>Preventing coastal erosion</i> (sub-section: Access routes) of the Code of Practice (Appendix 4 of the application) contain mitigation measures designed to protect marine and coastal habitats, prevent impacts on sensitive environments, avoid damage to adjacent lands and habitats, and ensure protection of the public interest, including conservation objectives, biodiversity, navigation, fisheries, recreation, tourism and other lawful uses within Kenmare River SAC. • Not interfering with navigation or other lawful activity in the vicinity of the licensed area: Part 3.14 <i>Prevent interactions</i>, Part 7 <i>Environmentally safe navigation</i>, Part 8 <i>Tourism, sport and recreation</i>, Part 9 <i>Aquaculture</i>, and Part 10 <i>Angling and fisheries activities</i> of the Code of Practice (Appendix 4 of the application) contain measures requiring harvesters to avoid congestion at piers, maintain appropriate distance from vessels and other users, and avoid interference with navigation routes, fisheries, aquaculture operations and other lawful marine and coastal activities within Kenmare River SAC. • Compliance with any lawful directions issued by the minister and any other competent state authority in that regard: Part 2 <i>Securing the Code of Practice during the operation phase</i> and Part 11 <i>Other seaweed harvesting activities</i> of the Code of Practice (Appendix 4 of the application) set out the management, training, auditing, monitoring and reporting framework governing implementation and compliance of harvesting operations, including engagement with relevant authorities where required. In addition, BioAtlantis has applied to MARA under the Maritime Area Planning Act 2021 for a Maritime Usage Licence, and the application is made on the basis that all operations will comply with any lawful directions or conditions issued by the Minister or other competent State authorities, where applicable.
CCC 1.4	General — The licensee shall take all practicable measures to minimise the visual impairment of amenities, arising from the operation of the activity.	BioAtlantis agrees in principle with the inclusion of a condition to minimise the visual impairment of amenities, arising from the operation of the activity, subject to the following clarifications and considerations: • The proposed activity is compatible with relevant Marine Spatial Planning and National Marine Planning Framework policies relating to seascape, landscape and visual amenity, as outlined in Appendix 11 of the application, <i>Assessment of Compatibility with MSP Policies and Activities in Kenmare Bay</i>. The assessment concludes that the proposal will not adversely affect Seascape and Landscape Policies, Seascape Coastal Types, or Seascape Character Areas, including Seascape Character Assessment 9 (SCA9).

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		• Appendix 11 further concludes that the likelihood of giving rise to impacts on seascape, landscape and visual disturbance is very low as (a) hand harvesting has a long established tradition along the west coast of Ireland (b) harvesting will take place on a sustainable basis and (c) measures are in place to prevent interactions between harvesting and recreation, sport and tourism-related activities. In addition, no infrastructure is involved in this application. Measures contained within the Code of Practice also ensure environmentally safe navigation methods are employed and that cumulative or in-combination effects do not arise. • The Code of Practice further includes measures to minimise impacts on visual and recreational amenity, including requirements that harvesters follow pre-planned harvest schedules, avoid sites where tourism, sport and recreation activities are taking place, prevent congestion at piers and pick-up points, respect space required by other harbour and port users, minimise noise and disturbance, and avoid harvesting at certain locations during peak tourism periods. Activities are also confined to the intertidal <i>A. nodosum</i> zone and do not involve permanent infrastructure or visually intrusive structures. • Appendix 11 also concludes that the proposal is unlikely to give rise to Likely Significant Effects (LSEs), either individually or cumulatively/in combination with other activities, including in relation to tourism, recreation, transitional water quality, material assets and seascape character. The AIMU Report separately addresses Landscape/Seascape (Section 11), Traffic and Transport including navigation (Section 12), Summary of Mitigation (Section 20), and consistency with National Marine Planning Framework policies (Section 21.4, including Table 12: MSFD Analysis), and concludes that impacts on landscape, seascape and related amenities are unlikely due to the sustainable nature of the proposed activities, the use of traditional harvesting methods, and the implementation of mitigation measures and environmentally safe navigation procedures.
CCC 1.5	General — The Licensee shall ensure that traditional harvesting rights and other traditional activities (whether subject to appurtenant and profit- à prendre rights or not) taking place in the licensed area are fully respected.	BioAtlantis agrees in principle with the inclusion of a condition relating to protection of appurtenant (folio) rights and profit- à prendre rights to harvest seaweed, subject to the following clarifications and considerations: Section 2.3 (c) of the application form states the following: <i>“On the 28th of June 2018, Minister Damien English clarified the legal position around seaweed harvesting and applications received under the Foreshore Act, as advised by the Attorney General. In line with this, this application ensures that traditional seaweed harvesting rights are fully respected and measures are included to ensure the license has no impacts on existing harvesting rights in Kenmare River SAC. BioAtlantis will not harvest in any area where existing appurtenant rights exist, without first obtaining permission from the owner of such rights. Where Profit-à-Prendre rights are</i>

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		<i>successfully registered with the Property Registration Authority of Ireland (PRAI)/Tailte Éireann, the harvesting plan will be adjusted to ensure that those individuals can continue to harvest. It is envisaged that a clause may be included in the licence issued to allow the harvesting of A. nodosum, stating that if a Profit-à Prendre rights holder provides sufficient proof of their right, the licensee would be prohibited from harvesting in that area, without first obtaining permission from the owner of such rights"</i>
CCC 2.1	Waste Management — An Operational Waste Management Plan shall be agreed with Cork County Council to inter alia provide details of the prevention, holding, transfer, disposal and/or recovery of all wastes (including unplanned mortalities, maintenance materials, chemical/hydrocarbon containers) arising from the operation of the proposed activity. Empty containers shall not be rinsed out on site but removed to an authorized facility for disposal. Appropriately authorized contractors only shall be used.	BioAtlantis agrees in principle with the inclusion of a condition relating to waste management, subject to the following clarifications and considerations: • Appendix 4 (<i>Code of Practice for hand harvest activities in Kenmare Bay</i>) of the application submitted to MARA includes measures relating to waste prevention and environmental protection. In particular, Section 3.15 ("Other") requires harvesters to "Ensure that no debris from boats is inadvertently deposited into the environment", "Ensure appropriate removal or recycling of any rubbish, debris or other foreign matter when ashore", "Ensure routine maintenance of boat engines", and "Ensure appropriate cleaning procedures of boats are undertaken". • The AIMU Report further states that "Impacts in relation to waste will not arise as a result of this application, and it is highly improbable that waste/debris will inadvertently be deposited into the environment." The AIMU Report also states that "harvesters will receive training where necessary in general hygiene best practises and means of disposing of any general waste or rubbish". • Appendix 5 (<i>Impact Assessment</i>) similarly states that "It is highly improbable that debris will inadvertently be deposited into the environment, as harvesters will be provided with training, where necessary, in general hygiene best practises and means of disposing of general and mechanical waste associated with boats."
CCC 2.2	Waste Management — The Operator shall ensure that the licensed areas, and any area used for service, maintenance, harvesting or onshore storage of plant and/or equipment, shall be kept clear of all materials (barrels, ropes, rafts, waste products), and shall make adequate provision for the prompt removal and disposal of all wastes and refuse from those areas.	As above for CCC 2.1.
CCC 2.3	Waste Management — The licensee shall take all practicable measures to minimise the visual	As above for CCC 2.1.

Public Body (comment no.)	Comment by Public Body	Response to Public Body
	impairment of amenities from storage of process or waste, plant, equipment, or material, and to prevent litter arising from the licensed activities.	
CCC 2.4	Water Pollution — In the event of any incident which may give rise to water pollution and/or risk to public health, the applicant shall immediately report the incident to Cork County Council at environ@corkcoco.ie as soon as is practicable, and no later than 24 hours after the incident.	BioAtlantis agrees in principle with the inclusion of a condition relating to Water Pollution, subject to the following clarifications and considerations: • The proposed activity relates to low-impact sustainable hand harvesting only and does not involve the discharge of pollutants or the use or storage of significant quantities of chemicals within the licence area. The AIMU Report states that “Impacts in relation to waste will not arise as a result of this application, and it is highly improbable that waste/debris will inadvertently be deposited into the environment”. The application documentation further states that “It is highly improbable that a chemical hazard will occur given that no chemicals will be carried on board of boats, except for standard cleaning and hygiene equipment.” • Appendix 4 (<i>Code of Practice for hand harvest activities in Kenmare Bay</i>) also includes measures relating to pollution prevention and environmental protection. In particular, Section 3.15 (“Other”) requires harvesters to “Ensure that no debris from boats is inadvertently deposited into the environment”, “Ensure appropriate removal or recycling of any rubbish, debris or other foreign matter when ashore”, “Ensure routine maintenance of boat engines”, and “Ensure appropriate cleaning procedures of boats are undertaken”. • The application documentation further provides that harvesters will receive training, where necessary, in general hygiene best practises and means of disposing of general waste or rubbish associated with the activity. Overall, the AIMU Report and Appendix 5 conclude that impacts relating to waste, pollutants and chemical hazards are highly unlikely to arise from the proposed activity.
CCC 2.5	Water Pollution — In the event of an oil and hazardous substance spill, the applicant shall immediately report the incident to the Irish Coast Guard.	As above for CCC 2.4.
CCC 2.6	Water Pollution — No substances listed in Table 11 or 12 of Schedule 6 of the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009) shall be discharged. All chemicals used in the licensed area shall be used in accordance with	As above for CCC 2.4.

Public Body (comment no.)	Comment by Public Body	Response to Public Body
	instructions issued by the Licensing Authority. The licence shall keep records of all chemicals including quantities and times of use.	
CCC 3	Shoreside Port Operations — In consideration of Cork County Council permitting the user access or usage of property, lands, harbour areas, port facilities owned by or under the responsibility of the Cork County Council (this includes facilities described as “public” in the application document), the Operator shall submit a port facility operation plan to Cork County Council. The plan should inter alia provide for:	BioAtlantis acknowledges that the operational use of any Cork County Council-owned piers, slipways, harbour areas or associated facilities may, where required, necessitate further engagement and coordination with Cork County Council. The proposed harvesting activity is intermittent in nature and does not involve the exclusive or permanent use of harbour infrastructure. The list of piers, quays and harbours identified in the application represents potential pick-up and access locations only, and not all locations may ultimately be used during operations. BioAtlantis is agreeable, where required, to engaging with Cork County Council in relation to operational arrangements for any specific Cork County Council-owned facilities proposed to be used as part of the licensed activity. Notwithstanding the above, the application documentation already considers and addresses a range of operational, access, navigation and interaction-management matters relevant to operations, pick-up points and associated harbour infrastructure, as follows: • AIMU report: Details regarding access to harvest sites and pick up points were provided in Section 2.3.3.2 of the application’s AIMU report as follows: <i>“2.3.3.2. Access to harvesting sites</i> <i>Access to the islands will be by boat, according to methods which minimise potential impacts on the SAC (e.g. harbour seals, estuarine mud areas, wintering and breeding birds, etc; see Appendix 4 of the proposal document). Access to the coastline will be via existing routes or boats as required. Should a pick-up boat be deemed applicable to the area, launch to islands will be made from existing piers. Individual harvesters will access sites via existing methods. The harvested seaweed will be collected in nets or bags at the shoreline; these nets or bags will then be collected by the pick-up boat (if deemed applicable for the area) and delivered to a pier for onward transport. The size of the shore area covered by an individual net or bag will be approximately 2m² to 8 m².</i> <i>Harvest will occur at islands and shorelines as described in the harvest management plan. Nets or bags will then be picked up at each location in which harvesting took place. Alternatively, harvesters may tow the floating nets or bags from the harvest site directly to</i>
CCC 3.1	Shoreside Port Operations — Name and location map of the port facility (pier, slipway, steps) to be used for primary access (normal operations).	
CCC 3.2	Shoreside Port Operations — Name and location map of the port facility (pier, slipway, steps) to be used in the event of the primary access facility not being available.	
CCC 3.3	Shoreside Port Operations — Information on the type of vessel(s) to be used (registration number, LOA, max draft, GT) at the selected port facilities	
CCC 3.4	Shoreside Port Operations — Confirmation that all vessels used are appropriately licensed by the relevant authorities	
CCC 3.5	Shoreside Port Operations — Name and location map of the lay-by berth/ port facility to be used by the above vessel(s)	
CCC 3.6	Shoreside Port Operations — Maximum number of crew/ workers using the selected port facilities and frequency of usage.	
CCC 3.7	Shoreside Port Operations — Production landing methods and frequencies at the selected port facilities.	

Public Body (comment no.)	Comment by Public Body	Response to Public Body
CCC 3.8	Shoreside Port Operations — Location of car parking for crew/ workers in the vicinity of the selected port facilities	<i>the pick-up points. In some cases, certain individuals with existing seaweed harvesting rights may prefer to land seaweed at pick up points.</i> <i>The seaweed will be weighed by BioAtlantis at pick up points and/or on delivery to the processing facility. Final pick-up points will be at established piers, quays and harbours. The piers typically vary in size from large, medium to small. While public piers will be accessed, privately owned piers will not be used without permission. The main pick up/collection points for transport to the processing plant are as follows:</i> - <i>South eastern area of Iveragh Peninsula: Blackwater Pier, Kenmare Pier, Templesnoe Pier.</i> - <i>South-mid area of Iveragh Peninsula: Oysterbed Pier, Rossdohan Pier, Coongar Harbour (pier).</i> - <i>North-mid area of Beara Peninsula: Bunaw Pier-Kilmakilloge Harbour, Lauragh Pier, Pallas Pier.</i> - <i>North-western area of Beara Peninsula: Ballycrovane Pier</i> - <i>North-eastern area of Beara Peninsula: Dawros Pier.</i> - <i>Access via the N70 and R571 respectively, including linked byroads and coastal roads.</i> <i>Harvesting will be carried out in a manner which does not negatively impact on fishing and sea angling in the complex. Several sites which are documented to be of relevance to fisheries and sea angling have been identified and will not be negatively affected by harvest activities (see Appendix 7 of the proposal document). The operational areas of charter boats and skippers in Kenmare River SAC have also been identified and will not be impacted by harvest activities. Harvesters will work to ensure that angler's space will be respected at all times"</i> • Natura Impact Statement: Figure 7 of the NIS provides a map entitled "Overview map of the proposed collection points in Kenmare Bay" • Code of Practice (Appendix 4): BioAtlantis notes that a range of operational and interaction-management measures relevant to shoreside and harbour-related activities are already incorporated into the application documentation, including Appendix 4 (<i>Code of Practice for hand harvest activities in Kenmare Bay</i>). In particular: Part 3.14 ("Prevent interactions") of the Code of Practice requires harvesters to: - <i>"Follow pre-planned harvest schedules in order to avoid potential congestion at pick up points such at piers that may be busy at certain times."</i>
CCC 3.9	Shoreside Port Operations — Proposed requirements for temporary storage of equipment or machinery at the selected port facility.	
CCC 3.10	Shoreside Port Operations — Risk assessment and method statement for the proposed activities	
CCC 3.11	Shoreside Port Operations — Waste management plan (compliant with the provisions of S.I. 351/2022, part 3 and Marpol Annex V)	
CCC 3.12	Shoreside Port Operations — A reporting procedure for damaged caused to port infrastructure, including access roads and Aids to Navigation (AtoNs)	
CCC 3.13	Shoreside Port Operations — A reporting procedure of Marine incidents or accidents	
CCC 3.14	Shoreside Port Operations — Insurance details, including: policy wording, cover period, Public/Products Liability insurance with an indemnity limit of not less than €6.5 million, Employers' Liability indemnity limit of no less than €13m and a specific notation of indemnity to Cork County Council.	
CCC 3.15	Shoreside Port Operations — Confirmation that the applicant understands that all vessels may be subject to harbour dues and/or port fees, including fish landing charges, cargo dues and waste charges as appropriate.	
CCC 3.16	Shoreside Port Operations — 24/7 contact details.	

Public Body (comment no.)	Comment by Public Body	Response to Public Body
		- <i>“Work to ensure that space required by others using piers, harbours, quays or ports is respected.”</i> Part 3.15 (“Other”) of the Code of Practice further requires harvesters to: - <i>“Ensure that no debris from boats is inadvertently deposited into the environment.”</i> - <i>“Ensure appropriate removal or recycling of any rubbish, debris or other foreign matter when ashore.”</i> - <i>“Ensure routine maintenance of boat engines.”</i> - <i>“Ensure appropriate cleaning procedures of boats are undertaken.”</i> Part 9 (“Aquaculture”) of the Code of Practice further requires harvesters to: <i>“Ensure caution when travelling in the vicinity of defined aquaculture navigation routes. Do not impede workboat or tractor access to aquaculture sites along access routes, including but not limited to those associated with routes via Bunaw Pier, Bunaw (Kilmackilloge Pier), areas near Kilmackilloge Pier, Blackwater Pier and Oysterbed Pier, roadway access points at Templenoe (upper Kenmare Bay), access along the foreshore over intertidal habitats (e.g. near Templenoe, via public roads such as R571), areas with existing rights of way and other locations including those near the Beara Peninsula, Sneem (e.g. slipway), Coulagh Bay, Travara, Eyeries, Kilcatherine Point, Ardgroom Harbour, Cleandra (landing pier), Coongar Harbour, Pallas Pier, inner Kenmare Bay, outer Kenmare Bay and private laneways or routes or pick up points”.</i>