

FEAS Observations on MUL260045 – Inner Galway Bay South, Arramara Teo

Graham Johnston, Hans Gerritsen, Oliver Tully, Francis O’Beirn, Jonathan White – Marine Institute
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Summary

- The application is for a 10-year license to hand harvest 1,510 tonnes per year of *Ascophyllum nodosum*/*Fucus* spp. seaweed from the intertidal zones of Inner Galway Bay (South), Co. Galway.
- Due to the littoral distribution of *A. nodosum* and *Fucus* spp. the impact on fish ecology, fishing activities and aquaculture is generally likely to be minimal. Intertidal seaweed areas may be important habitat and nursery areas for wrasse, which is used in aquaculture and as bait in pot fisheries, and for shrimp (*Palaemon serratus*).
- The information provided in screening for AA assesses the potential impact of seaweed harvesting on the ecology of the habitats. A harvest rate of 20% is proposed based on annual surveys of biomass of seaweed.
- There are 3 MUL applications for inner Galway Bay (one is referred to as outer but in effect it is contiguous with the south inner Galway Bay application). The individual and cumulative effect of the 3 applications should be considered together and in-combination with other activities in the area.

Fisheries Ecosystems Advisory Services (FEAS), Marine Institute, were asked by DAFM for observations on MUL260045, an application for a foreshore licence, transferred to MARA and designation as a MUL, submitted by Arramara Teo. for the purpose of seaweed harvesting in Inner Galway Bay (South), County Galway.

The following response is with consideration of potential impacts on sea fisheries and the seafood sector, including aquaculture.

General comments on all seaweed MUL applications

Multiple applications within similar timeframes, areas, habitats may have cumulative effects on an area, its habitats, ecology and fishery that are not collectively estimated or considered in the individual applications.

Where SACs and SPAs are present, it should be verified that the particular activity complies with regulations that will safeguard the ecological integrity of the site in view of the site's conservation objectives under Article 6 of the Habitats Directive and also have regard to the requirements of the Environmental Impact Assessment Directive.

Where sub-tidal zones marked for harvesting of seaweed can be subject to considerable coastal erosion, removal of substantial quantities of *Ascophyllum* or *Fucus* species may result in more wave action on the intertidal zone and therefore increase exposure levels and ecology on rocky shores.

The MUL applications propose to limit the harvest rates to 20% of biomass per annum and to adopt rotational harvest practices and refers to international practice in identifying the sustainable harvest limits and the harvest strategies to limit impacts of the harvest.

The associated post-harvesting and transport logistics associated with the activity and the potential effects on other marine users of piers and access roads is not described. This can be relevant given the remote locations of the harvest sites.

The proposed harvesting targets species that are components of Group 2 habitats (Macroalgal forests; Seaweed communities on full salinity Atlantic littoral rock and Fucoids on variable salinity Atlantic littoral rock) listed in the Nature Restoration Regulation and which are subject to restoration targets. Seaweed harvesting is a significant pressure on these habitats and could compromise the achievement of restoration targets. It is important therefore to estimate the cumulative footprint of all such licence applications and how in combination with other pressures they may affect restoration targets. These habitats are also components of Habitats Directive habitat codes 1170, 1160 and 1130.

Due to the littoral distribution of *A. nodosum* and *Fucus* spp. which tend to be shallow, the impact on fishing activities is likely to be minimal. Likewise, spawning and nursery grounds of commercially important fish species, close to the proposed harvest areas, are not likely to be affected. Intertidal and shallow sub-tidal macroalgal forests are critical habitat for wrasse, which are used in aquaculture and as bait in pot fisheries and shrimp (*Palaemon serratus*) which is commercially exploited in the estuarine and shallow inshore waters of Galway Bay.

Application-specific comments

The application is for a 10-year license to hand harvest 1,510 t per year of *Ascophyllum nodosum*/*Fucus* spp. seaweed in Inner Galway Bay (South), Co. Galway.

The Application recognises that the harvesting area is within the Galway Bay SAC complex (IE000268) and Inner Galway Bay SPA (IE004031).

The proposed MUL area is adjacent to several key fisheries. These include pot fishing (targeting lobster *Homarus gammarus*, velvet crab (*Necora puber*) and shrimp *Palaemon serratus*), net fishing (primarily for bait including wrasse species), and dredge fishing for *Spisula solida* occurs close to the MUL area, There appears to be no overlap between the MUL area and other fishing activities. The MUL area is proximal to native oyster beds in inner Galway Bay.

As the coordinates or GIS boundary of the proposed MUL area are not provided within the application documents reviewed, it is not possible to independently assess the extent of overlap between the proposed MUL area and existing fisheries or other maritime uses. It is also not possible to verify whether the MUL boundary is wholly confined to the intertidal zone or extends into shallow subtidal waters. While the application repeatedly describes the harvesting activity as occurring within the intertidal zone, the precise seaward extent of the licensed area is not clearly defined in the documentation reviewed.

Licensed activities are found to overlap with the proposed MUL area. These licensed aquaculture sites are T09-501A, T09-482A, T09-393, T09-463A and T09-065A, as well as Fishery Orders (T09005A and T09-065). In addition, there are a number of other licensed sites adjacent to the proposed MUL areas. The SISAA report identifies aquaculture activities as an activity for in-combination effects consideration with the proposed seaweed harvesting. It would be important that the disturbance effects on marine mammals and birds of both activities are considered in-full in any Appropriate Assessment.