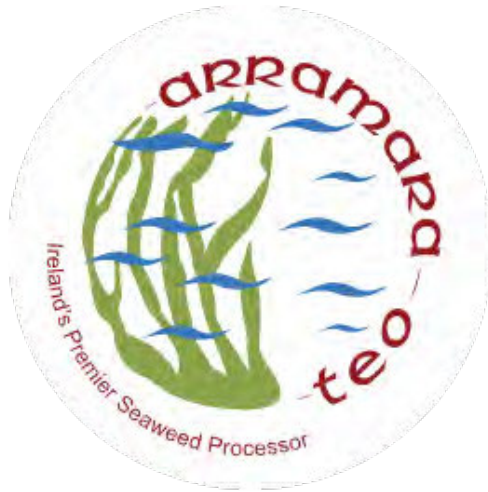




Supporting Information for Screening for Appropriate Assessment Related to the Harvest of Seaweed

Inner Galway Bay South

COMMERCIALLY CONFIDENTIAL

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Abbreviations

AA	Appropriate Assessment
AIMU	Assessments of Impacts of the Maritime Usage
GIS	Geographic Information System
JNCC	Joint Nature Conservation Committee
MUL	Maritime Usage Licence
MARA	Maritime Area Regulatory Authority
MU	Management Units
NPWS	National Parks and Wildlife Service
QI	Qualifying Interest
SAC	Special Areas of Conservation
SCI	Special Conservation Interest
SISAA	Supporting Information Screening for Appropriate Assessment
SPA	Special Protection Areas
SPR	Source Pathway Receptors
ZOI	Zone of Influence



1.0 Introduction

The Maritime Area Regulatory Authority ("MARA") was established under the Marine Area Planning Act 2021("MAPA"). The commencement date for MARA was July 17, 2023. Under Section 7 of MAPA, MARA has the authority to grant a Marine Usage Licence ("MUL") for the harvesting of seaweed.

Arramara Teoranta (Teo) is applying to MARA for a Maritime Usage Licence (MUL) to harvest the seaweed *Ascophyllum nodosum* and *Fucus spp.* (hereafter referred to as *Ascophyllum*) from the intertidal shoreline of Inner Galway Bay South, County Galway (Table 1 and Figure 1), targeting an annual harvest of up to 1,510 wet tonnes.

Arramara Teo has been sustainably harvesting *Ascophyllum* in the region for several decades, and the present MUL application aims to allow Arramara Teo to continue its harvesting activities. Arramara Teo has relied on local harvesters to obtain *Ascophyllum* and will continue to do so. This MUL application only applies to state-owned foreshore and excludes any portion of the foreshore for which a seaweed appurtenant right has been identified by Tailte Éireann, formerly the Property Registration Authority of Ireland. The Property Registration Authority of Ireland was contacted, and relevant information obtained. Biomass assessments also reflect this.

Arramara Teo believes a regulated, licensed industry is the only protection for Ireland's National seaweed resources.

	Geographic Descriptions and Coordinates of Arramara Teo's proposed MUL area
Harvest Allowance	See Figure 1
Harvest Restriction	To ensure compliance with existing legal rights and to avoid any potential conflict with rights holders, harvesting operations will not take place where Appurtenant Rights have been registered with Tailte Éireann.

Table 1 - Geographic Descriptions and Coordinates; Inner Galway Bay South



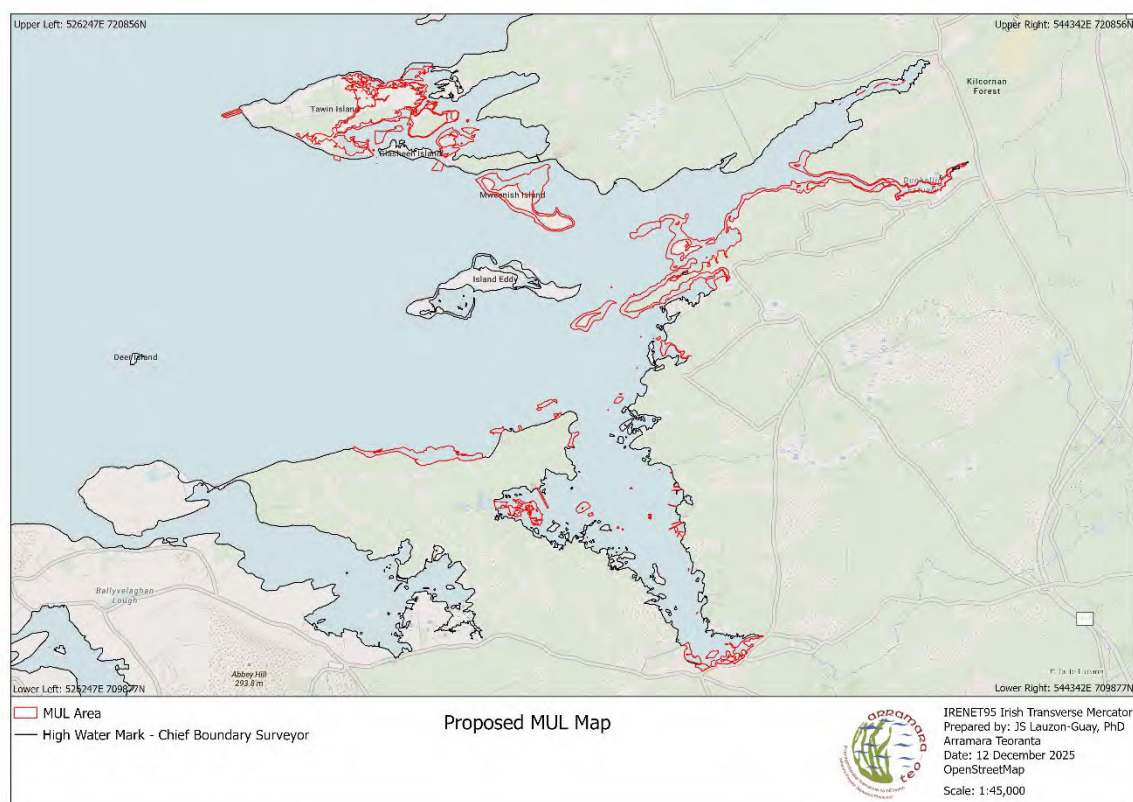


Figure 1 – Geographic description and proposed Arramara Teo MUL Area

1.1 Company Profile and Historical Context

The west of Ireland has supported human use of seaweeds for centuries. Initially taken as ‘storm tossed’ (seaweeds thrown ashore during North Atlantic storms), a variety of species have been used to build up otherwise sparse soils, to fertilise gardens and to supplement the diets of animals. As coastal communities became more familiar with the benefits of seaweed they began to harvest specific species for personal dietary, therapeutic and medicinal purposes.

Entrepreneurial and scientific knowledge grew, and commercial uses of certain species emerged. Commercial use within Arramara Teo evolved to where the harvesting of the species as responsibly and sustainably as possible became integral to sustaining the industry.

Founded in 1947 in *Cill Chiaráin* (Kilkieran), Connemara, County Galway, Arramara Teo has been acquiring and processing seaweed for over 79 years along the western coast of Ireland. It acquires seaweed from over 200 local harvesters and provides employment for 29 employees at its processing plant located in Kilkieran, County Galway. At its peak in 1979, the company processed 62,000 tonnes (Guiry & Blunden, 1981). Since 1964, sustainable annual harvests of *Ascophyllum* and *Fucus* have ranged from 8,000 to 28,000 wet tonnes, with an average of 22,000 tonnes per year since 2008 (Guiry & Morrison, 2013).

Arramara Teo is now a subsidiary of Acadian Seaplants Ltd (“ASL”), a family company founded by Louis Deveau in 1980 and based in Nova Scotia, Canada. ASL acquired Arramara from Údarás na Gaeltachta in May 2014. Údarás na Gaeltachta had held 100% of the company shares on behalf of the State since



2006. Prior to 2006 the Department of Marine and Natural Resources owned 82% of shares while ISP Alginates, a Scotland-based subsidiary of a multi-national corporation, held the remaining 18% of shares.

There is a deep tradition of hand-harvesting seaweeds along Ireland's west coast (*MacMonagail & Morrison, 2020; see Appendix A - Literature Review of Commercial Harvesting of Ascophyllum nodosum*), although boat and rake harvesting has recently become more common. Arramara Teo initially processed various seaweeds, including *Laminaria* and *Saccharina*, before focusing on *Ascophyllum* and *Fucus*, which remains its primary species processed in its Kilkieran factory for agricultural, horticultural, aquaculture, and alginate industries.

While Arramara Teo's operation is now solely based in the Connemara Gaeltacht region of Kilkieran, it had previously operated additional facilities near Newport, County Mayo and at Dungloe, County Donegal. These facilities were closed as efficiencies in resource management, logistics and production were realised. This indirectly allowed another Irish seaweed company to establish and grow in County Donegal, utilising the same species. Arramara Teo continued to acquire resources from harvesters across Counties Mayo, Galway and the northwest corner of County Clare and this continues to be the primary supply area for Arramara Teo today.

Over the past 78 years, Arramara Teo has emerged as Ireland's largest purchaser and processor of select intertidal seaweed species. During that time and in the absence of licensing, Arramara Teo has managed to gently guide resource management and harvest activity in its traditional harvesting procurement regions of Counties Galway, Mayo, Donegal and northern County Clare. This tactful evolution has resulted in a sustainable resource and an uninterrupted industry track record throughout Ireland's west coast.

In 2014, Arramara Teo submitted a licence application to harvest seaweed from the foreshore of Counties Mayo, Galway and Clare to the Marine Planning and Foreshore Division of the Department of Housing, Planning, Community and Local Government Ref (FS006108). While the application was being processed and prior to publication for public consultation the Department suspended the foreshore licencing process for all seaweed application in April 2015 pending consultation with the Attorney General on the status of existing seaweed rights on the foreshore. Arramara Teo views licensing as formalizing the responsibility to ensure the orderly, sustainable and continued development and growth of the *Ascophyllum* and *Fucus* harvest in Ireland as well as providing the justification for future investment.



1.2 Current Business Model

Arramara Teo has developed a thorough management plan for the harvest of *Ascophyllum*. This is based on years of experience harvesting in the region combined with expertise from the development and implementation of similar management plans for the harvest of *Ascophyllum* in Canada, United States, and Scotland. The main components of the management plan include:

- **A single licensee per region** - This ensures that the resource is not overharvested because of competitive pressure from multiple companies. It also allows for the licensee to exert some control over the quantity of resource removed on a yearly basis.
- **The implementation of area-based management** - The foreshore is divided into sectors that form the management unit. A biomass assessment is conducted within each sector to evaluate the available biomass of *Ascophyllum*. Based on these assessments, a yearly quota is established for each sector.
- **Harvest quotas per sector** - A maximum of 20% of the standing stock of *Ascophyllum* is harvested annually in any sector. This level of harvest is commonly used in Canada, United States, and Scotland. It has proven to be sustainable after more than two decades of continuous commercial harvesting, having no long-term impact on the biomass, length, or morphology of *Ascophyllum*.

Arramara Teo employs two permanent marine biologists to conduct biomass assessments and to monitor the condition of the resource. Arramara Teo also employs three resource managers who oversee the harvesting activities, work with the harvesters, and ensure that annual quotas are respected.

1.3 Harvest Management Plan

There is a long history of commercial harvesting of *Ascophyllum* in the region (*Guiry and Morrison, 2013*) and many of the *Ascophyllum* beds have been harvested for several decades.

Arramara Teo's current model is to buy *Ascophyllum* and *Fucus* from many different local independent harvesters along the West Coast of Ireland. Arramara remains committed to these harvesters' long history, tradition and culture of harvesting seaweed. As such, Arramara Teo will enter contract supply/service agreements with the harvesters for the supply of seaweed. The agreements will include, as part of our Harvest Management Plan, specific areas to cut and a schedule that fits the need of the harvester. In addition, Arramara is committed to training and supplying the harvesters with the necessary equipment to ensure seaweed is cut sustainably.

The purpose of the Harvest Management Plan is to ensure traditional harvesting activities are properly conducted allowing growth and development of the industry while maintaining excellent environmental stewardship of the *Ascophyllum* and *Fucus* resource and ecosystem. This objective has been accomplished by doing the following:

- Research the current harvesting methods to evaluate and quantify sustainability and identify improvements to the harvesting techniques to maximize the biomass.
- Strengthen the management approach to ensure a sustainable industry based on good quality biomass.



- Understand the resource using historical landings data.
- Develop biomass assessment using satellite/aerial imagery and ground-truthing surveys.
- Develop harvest strategies for each sector.
- Develop resource management protocols.
- Develop harvester support and training.

Arramara Teo's annual Harvest Management Plan is prepared based on information developed and maintained in the seaweed resource records of the company. From the data, the level of sustainable harvest is determined by using the following information:

- Detailed resource sector maps.
- Detailed data on actual seaweed volumes.
- History of previous harvest and regrowth rates.
- History of harvest rates and harvesting methods employed.
- Availability of harvesters.
- Demand for the seaweed to meet production forecasts.
- Relative cost of harvest delivered to the factory.

While annual harvest budgets are set by Arramara Teo, they are based on historical information and current projections from the harvesters cutting in the area. This planning allows for the orderly flow of raw material for production purposes. The harvest occurs year-round but at a very low intensity. Only one harvester is active at a time along the foreshore in any sector included in this license application, and they only harvest for a total of 20 days per year per sector.

These harvesters employ two different methods to harvest *Ascophyllum*: the traditional harvest and the boat and rake method. Both are described in Section 2.3 – Harvesting Methods.

The harvesters cut and prepare their seaweed for transport. As the harvesters are independent contractors, they manage access to the seaweed that they cut. The harvester contacts Arramara Teo when they have enough seaweed to be picked up and transported to the factory in Kilkieran. Arramara Teo sends a resource manager to verify the quantity and quality of seaweed that has been cut and then arranges for the purchase and transport of the seaweed to the Arramara Teo factory for processing.

1.4 Statement of Authority

The authors of this report have extensive expertise and experience in seaweed ecology, sustainable harvesting practices, and industry operations. With decades of combined research, including published works on the ecology of commercially important seaweed species and the environmental impacts of seaweed harvesting, as well as training in Appropriate Assessment and the Habitats Directive (2024), the authors are well-equipped to develop this comprehensive Screening for Appropriate Assessment (SISAA) report. Their involvement in academic research and industry projects has allowed them to contribute to sustainable practices globally, making them authorities in seaweed management. Their experience developing sustainable harvest plans in Canada, the USA, and Scotland, as well as industry-leading sustainable harvest management practices, has provided them with the required knowledge and experience to develop this report.



1.5 Aim of this SISAA Report

This Supporting Information Screening for Appropriate Assessment (SISAA) report has been prepared per the current guidance documents, and it assesses the likely significant effects of the proposed seaweed harvesting operation on its own, or in combination with other plans or projects, on any European site. European sites are designated as Special Areas of Conservation (SAC) under the Habitats Directive or Special Protection Areas (SPA) under the Birds Directive. The Appropriate Assessment (AA) screening stage considers whether, based on objective scientific evidence, it can be concluded that there are no likely significant effects on any European site, given best scientific knowledge and the conservation objectives of the relevant European sites.

This SISAA report provides the information required to justify the determination made related to the likelihood of the proposed seaweed harvesting to likely significantly impact the surrounding Natura 2000 sites in the context of their conservation objectives.

1.6 Approach to Screening for Appropriate Assessment

This SISAA has been undertaken to inform the Screening for Appropriate Assessment, which will be carried out by MARA per Figure 2 below.

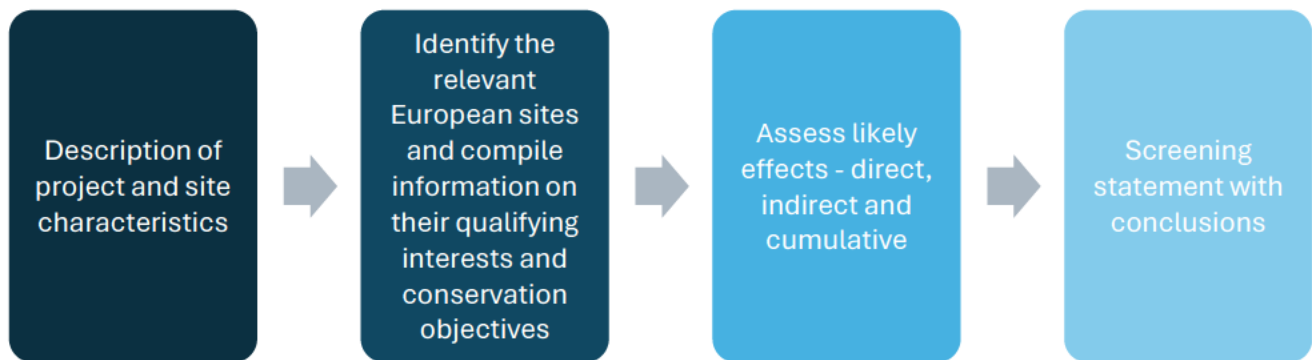


Figure 2 - Screening process adopted for Screening for Appropriate Assessment

By taking the ecological impact assessment in a step-by-step manner concerning the habitats and species of the Natura 2000 sites, together with their conservation objectives, this report seeks to inform the screening process required as the first stage of the process according to Article 6.3 of the EU Habitats Directive.

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives... "

1.7 Description of Proposed Project

Arramara Teo is applying for an exclusive 10-year MUL to harvest *Ascophyllum* and *Fucus* from Inner Galway Bay South.

This SISAA report covers the annual harvest of 1,510 tonnes of *Ascophyllum* and *Fucus* from the intertidal zone of Inner Galway Bay South. The areas and harvest quantities only consider state-owned foreshore free from any appurtenant rights.

Biomass assessments have been conducted to map and quantify *Ascophyllum* and *Fucus* in the bay. Based on those assessments, management plans detailing the sustainable harvesting programs have been developed for Inner Galway Bay South.

2.0 Resource Management

2.1 Overview

The accurate biomass assessments, scientific information collected, and experience gained by the company over the past several years has provided detailed information regarding the intricacies of developing a sustainable seaweed harvest fishery in Ireland. The commercial harvest of *Ascophyllum* and *Fucus* in Ireland has long been a traditional fishery working well with all stakeholders in all harvest areas. Arramara Teo has over 79 years of experience in harvesting, and these relationships of trust with harvesters is a guiding principle to a sustainable harvest. Arramara Teo will also continue to make the necessary investments in harvesting infrastructure, trucking, recruitment and training of harvesters.

Specifically, Arramara Teo has adopted a resource management model based on the well-accepted Area Based Management Model that is used in many jurisdictions globally. This includes the following seven components:

- Professional management team of resource scientists and resource managers
- Long tradition of trust with harvesters
- Monthly resource management meetings
- Harvester recruitment and training
- Harvester tools and infrastructure
- Harvesting plans
- Harvesting management and monitoring

Arramara Teo has been operating under this model; however, in an open fishery, the orderly management of the biomass is difficult to control when it is unknown how other harvesters are managing their operations. This makes sustainability of the resource challenging and could lead to overharvesting.

2.2 Resource Management Team

Arramara will continue to use its team of experienced and qualified resource management professionals to implement the sustainable harvest of the resource. The team is comprised of resource management personnel from Arramara Teo and Uist Asco operations throughout Ireland and Scotland and senior leaders from other parts of both organizations, providing over 50 years of combined experience. Monthly meetings are arranged for the Resource Management and Research teams to approach harvest management, planning, execution and problem solving. These meetings



provide a forum for the exchange of ideas, experiences and challenges faced during the harvest season. The resource managers and the rest of the management team benefit from the feedback provided at these meetings.

The management of the harvest in Arramara Teo is led by three resource managers. Each is assigned a specific geographic area and brings specific technical, harvesting, agriculture and cultural competencies to the team and are very familiar with all harvesting activities. They are well qualified to conduct their duties in a professional manner.

2.3 Harvesting Methods

Traditional Harvesting

Traditional harvesting involves using one to two local harvesters, also known as cutters, working within a specific section of the foreshore. The seaweed is cut on foot at low tide within a 20 m x 20 m section of bed using a knife or sickle (see Figure 3), leaving at least 25 cm attached to the substrate to ensure re-growth of the plant. This traditional harvesting is carried out in strict rotation to allow the *Ascophyllum* to regrow, with harvesters only returning after 3 to 5 years.

Using a fork, the seaweed is then gathered into bundles (called “*climíní*” in Connemara Irish) of approximately 2 to 3 tonnes, which are bound by 20-meter-long nets and ropes and left on the intertidal shoreline. These bundles float at high water and are towed by a small boat (3 to 4 metres in length, 20 to 30 HP outboard engine) to a suitable pier for collection by a lorry with a crane that lifts the *climín* onto the lorry, where it is inspected by a resource team member before a haulier transports the seaweed to Arramara Teo for processing (usually in 20-tonne loads). Hauliers access the seaweed through the road networks and existing tracks.

Hand Harvesting using a Small Boat and Rake

The boat and rake method was introduced to Ireland in 2015 by Arramara Teo. It is an effective and sustainable method to harvest *Ascophyllum*, which has been used in Canada for over 40 years and has been recently implemented in the United States and Scotland. For the boat and rake method, harvesters manoeuvre their boat (maximum length 3 to 4 metres, 30 HP outboard engine) to the bed they wish to harvest on the rising tide. The boats are specifically designed to carry a load of 3 to 4 tonnes of seaweed. The harvester cuts the seaweed using a specially designed cutting rake that allows the harvester to target and trim the upper portion of individual plants and bring the cut portion into the boat. All rakes are equipped with a 15-cm rail to prevent cutting from occurring too close to the holdfast. Figure 3 shows an Arramara Teo boat and rake harvester.

Once full, the boats are unloaded at a landing site directly into a truck or stored into nets for collection within a few days after the initial cut. Harvesting from the boat allows harvesters to operate during high tide and store the seaweed in the boat rather than leaving it on the shore. Because their vessel is constantly moving with the tide and currents, harvesters gather *Ascophyllum* plants in a patchy and pruning fashion. This process leaves ample canopy for other intertidal inhabitants, allows for a rapid regeneration of seaweed shoots and minimizes the disturbance of the habitat architecture. Overall, our research finds the boat and rake method to be a highly sustainable practice.





Figure 3- Image of Traditional (left) and Boat and Rake (right) harvesters

2.4 Harvester Training and Recruitment

Harvester training and recruitment is extremely important to the success of Arramara Teo. Standard Operating Procedures for Harvesting of *Ascophyllum nodosum* provides all harvesters cutting seaweed for Arramara Teo good knowledge of the company expectations.

The total number of harvesters engaged is approximately 200, and most harvesters are professional fishermen. Annually harvesters are invited to the factory in Kilkieran for presentations and training to familiarize themselves with the seaweed industry including seaweed biology, weather, tides, safety guidelines, coastal geology, assessment, harvesting guidelines and regulations, compliance, reporting, and maintenance of harvesting tools. It is reiterated to all harvesters that training and proper safety is critical to the success of the any harvest season. Resource managers also conduct training of new harvesters in the field. This includes familiarization with assigned harvest areas, harvesting tool maintenance, harvesting technique and safety equipment.

Ongoing training is conducted through placement with experienced harvesters to provide knowledge concerning tides and currents, boat handling at the harvest sites, proper boat loading procedures and transportation of harvest safely to the landing site.

Harvester health and safety is the number one priority of all parties involved. Arramara Teo encourages all harvesters to obtain marine training. Compliance monitoring of harvesters and equipment is conducted on a regular basis by Resource Management and Safety personnel.

2.5 Boat Safety

All harvesters using Arramara Teo's boat and rake method are required to undergo boat safety training before use. This training takes approximately 8 to 10 business days to complete and is either company provided, or company supported. The following training and/or certifications are required:

- Certified National Power Boat Certificate
- VHF Certificate
- Hydraulic Equipment Handling/Maintenance Training
- Internal Arramara Safety training and Induction
- On water harvest training with an experienced harvester



In addition, all boats provided by Arramara are registered with the Marine Survey office in Ireland. Boats are classified as work boats and have P4 designation. Boats are maintained on a regular basis by an independent contractor. This contractor does all boat and motor maintenance for the fleet.

2.6 Harvest Management and Monitoring

The annual Harvest Plan is a key component of Arramara Teo's annual budgeting and planning process.

For the management of the *Ascophyllum* and *Fucus* resource, the coastline was divided into 21 bays. From the north, the first bay is in Broad Haven Bay, Sruwaddacon Co. Mayo. The last bay is in Shannon Estuary, Co. Clare.

Arramara Teo produces a Harvest Plan prior to the start of the annual harvest and an annual Harvest Report upon the completion of the annual harvest.

The annual Harvest Plan includes a complete list of the bays to be harvested, which are further divided into sectors to provide a higher resolution, the volumes to be harvested, planned meetings with harvesters, and the planned financial and human resources required to implement the harvest plan.

Arramara Teo collects data on its harvested resources. The data are used to track harvester remuneration and are also used by the resource manager to track landings. All harvests, by sector, are recorded to generate harvest landing reports.

The annual Harvest Report itemises the results of the annual harvest and will be presented to the relevant regulatory authorities. The Harvest Report includes following subject areas:

- Harvested quantities
- Harvest landings by bay
- Harvest landings by sector
- Assessment of the resource
- Future considerations

3.0 Sustainable Harvesting of *Ascophyllum* & *Fucus*

3.1 Quantitative *Ascophyllum nodosum* and *Fucus vesiculosus* Biomass Survey

Since 2014, Arramara Teo has developed an intensive assessment program to enhance its understanding of total and harvestable *Ascophyllum* biomass, which is essential for a viable fishery and effective management plan. The program incorporates scientific sampling, extensive ground-truthing, sector bed mapping using remote sensing, and harvest experience, resulting in high-resolution biomass data stored in a GIS database. This comprehensive dataset informs Arramara Teo of the current condition of resources on the West Coast of Ireland.

The field surveys, which are the most recent and detailed in Ireland, estimate *Ascophyllum* and *Fucus* density across harvesting sectors to calculate harvestable biomass. Sampling locations were chosen



within main beds to ensure representativeness. Sampling was conducted within a four-hour window around low tide. A 30 m transect was set parallel to the shore at the midpoint of the *Ascophyllum/Fucus* zone, with ten 50 x 50 cm (0.25 m²) quadrats randomly placed along the transect. Shoots were cut 25 cm from the holdfast, weighed using a digital hook scale, and recorded as density per unit area. Bed width measurements were also taken to calibrate satellite-based area data. (See Appendix C - Biomass assessments of *Ascophyllum nodosum* and *Fucus spp.*)

3.2 Available Biomass

Arramara Teo resource scientists have calculated the standing biomass of *Ascophyllum* and *Fucus* to be greater than 7,551 tonnes for Inner Galway Bay South. Arramara Teo is applying for an annual harvest of 1,510 tonnes (20% of the standing stock). The exact biomass to be harvested, as well as the size of the harvestable areas in the MUL and the total standing stock of the targeted seaweed, can be seen in Table 2. Further detail can be found in Section 3.4, which outlines in more detail how Arramara Teo will manage the resource to ensure that harvesting of the resource remains sustainable.

The seaweed will be harvested from the mid and low intertidal shores of sheltered and semi-exposed rocky shorelines from the Bay (see Table 1). Existing piers, landing sites and roads will be used for the collection and onward transport of the harvested seaweed.

Region	Sector	MUL Area (ha)	Intertidal Bed Area (ha)	Density Asco (kg/m ²)	Density Fucus (kg/m ²)	Density Asco and Fucus (kg/m ²)	Number of transects	Proposed Annual Harvest (t)
Inner Galway Bay South								
	Total	288.8	60.7				27	1510

Table 2 - Sustainable harvest estimates and sectors within the MUL area

3.3 Implementing a Precautionary Approach to Harvest Management in Ireland: Area-Based Management

Ascophyllum and *Fucus* are not only the raw material for the industry but also form important habitats for diverse species (Kelly et al. 2001; MacMonagail et al. 2017). Area-based management is a spatial management strategy for conservation and management of marine resources. It divides an area into small geographic units or sectors which become the management units. The units vary in number and size depending on the quantity of the resource within a bay. Each unit has its harvest budget, which is determined by our biomass surveys. Area-based management can be used to customise harvest plans to respond to small-scale ecological concerns relevant to the resource or the habitat, such as protecting waterfowl breeding areas. It also allows yield to be optimised when there are changes in productivity or geographical differences in productivity within harvest areas over time.

Other advantages of area-based management are economic. The assignment of an exclusive license gives the company the security of raw material supply. This, in turn, permits investment of both



human and monetary resources in research and development to reach the goals of the harvest plan and make a viable industry.

Area-based management for the harvest of *Ascophyllum* has been successfully used in Canada and in Maine, USA for several decades by Acadian Seaplants, the parent company of Arramara Teoranta. Acadian Seaplants has also implemented it in North Uist, Scotland, in 2020 to sustainably manage the harvest of *Ascophyllum* under the guidance of NatureScot. Arramara Teo proposes to use this same management strategy in the MUL area proposed in the West coast of Ireland.

3.4 Harvest Regulations

To minimise significant changes in the structure of the resource and its biomass, the management plan also includes conservative exploitation rates well below the annual growth of the resource. *Ascophyllum* generally produces 40% (and up to 70%) of its biomass annually (Lauzon-Guay et al. 2021, Cousens 1985, Vadas, Wright & Beal, 2004). A recent study has demonstrated that these approximations may be underestimating the real productivity of the species (Lauzon-Guay et al. 2022). Field studies in Ireland indicate that the growth rates are similar or higher than in Canada (MacMonagail, unpublished data). In Canada, up to 25% of the standing stock of *Ascophyllum* is removed annually by harvesters. This level of harvest has had no impact on the biomass or height of *Ascophyllum* after more than 20 years of continuous harvest (Lauzon-Guay et al. 2021). As a precautionary approach, we propose a conservative annual exploitation rate of 20% in the proposed MUL area. Each sector may not be harvested to its maximum harvest potential depending on several factors, including the harvest method employed, availability of harvesters, demand for seaweed to meet production forecasts, the relative cost of harvest delivered to the factory and other practical constraints. The 20% represents the maximum that may be harvested within a year in any sector. In addition to the exploitation rate, our management plan controls cutting height (25 cm) and holdfast removal.

All these internal regulations are components of the precautionary approach and general conservation principles Acadian Seaplants and Arramara Teo apply everywhere they harvest *Ascophyllum*.

3.5 Resource Monitoring and Research

Over the last ten years, Arramara Teo has developed and implemented scientific surveys, biomass assessments, and research in Ireland.

3.6 Proposed Scientific Monitoring Plan

Arramara Teo proposes to follow the internationally recognised scientific monitoring methodologies developed and practised by Acadian Seaplants Limited in Canada, the USA, and Scotland.

The biomass of *Ascophyllum* within Inner Galway Bay South will be monitored through annual resource inspections and biomass sampling (Figure 4). Based on this monitoring, the Harvest Plan for the following year will be adjusted.



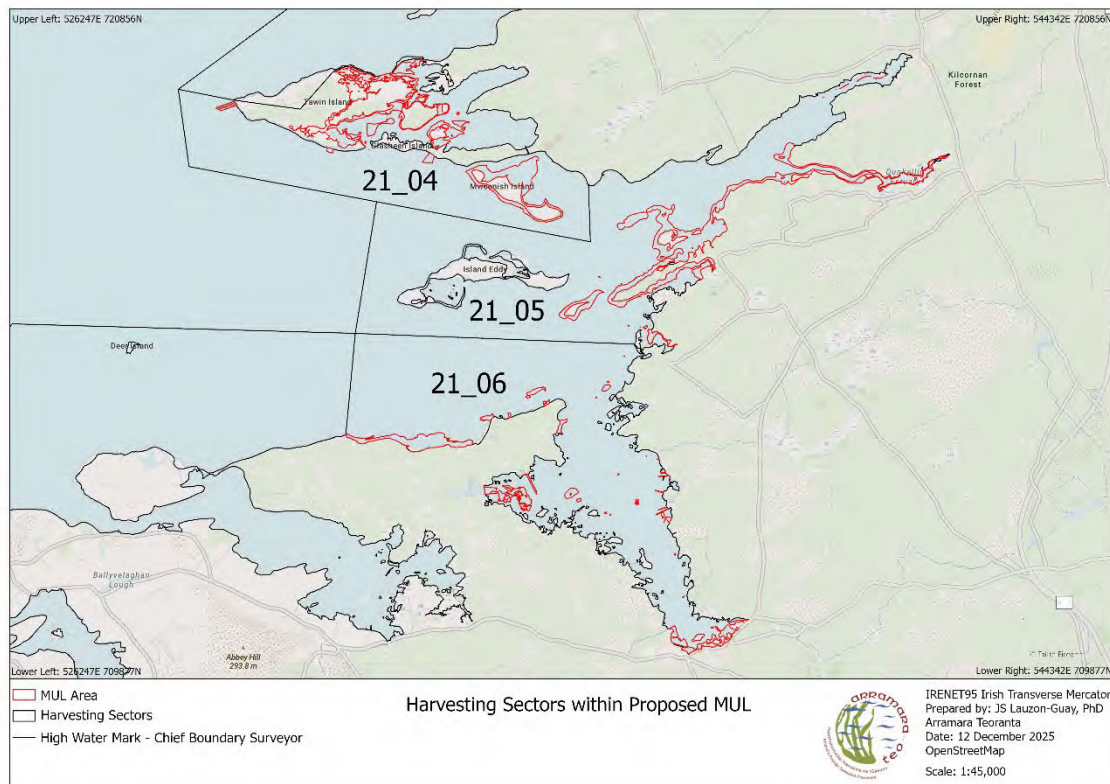


Figure 4 - MUL area with harvesting sectors used for the management of the harvest.

3.7 Description of the Receiving Environment

To describe the receiving environment of Inner Galway Bay South, several relevant data sources were utilised, including data provided by The National Parks and Wildlife Service (NPWS), the Marine Institute (MI), Coordination of information on the environment (CORINE), and other relevant datasets.

For Inner Galway Bay South, we present:

- Natura 2000 sites within the Zone of Influence (ZOI) and their relevant Qualifying Interests.
- Substrate.
- Description of the biota.
- The presence of significant populations of Annex I and Annex II species.

Intertidal transects were surveyed as part of these baseline characterisation assessments. See Appendix B - Ecology Assessment - Inner Galway Bay South. The ecology of Inner Galway Bay South is described below in the context of the wider environment and the Natura 2000 sites.

3.8 Ecological Assessment

Horizontal and vertical shore transects were sampled at Inner Galway Bay South. Vertical shore transects with multiple quadrats allowed a description of the extent of the biotopes present in the survey sites. Fauna and macroalgae (including epiphytic algae) were recorded along with substrate type, wave exposure, and width of the algal band on the shore. As the shores tended to be composed

of hard substrates such as bedrock, boulders, cobble and gravel, it was not possible to collect cores for the fauna.

A description of Inner Galway Bay South, including a description of each biotope recorded, the fauna encountered, and the extent of the biotope, is also outlined in Appendix B - Ecology Assessment – Inner Galway Bay South. Descriptions of the biotopes are from the JNCC Marine Habitat Classification for Britain and Ireland (Connor *et al.* 2004).

3.9 Inner Galway Bay South

Inner Galway Bay South is part of Galway Bay Complex SAC (IE000268) and Inner Galway Bay SPA (IE004031), shown in Figure 5. Galway Bay South holds a high number of littoral communities (12) which range from sandy beaches with rock or sand dunes behind to rocky terraces. The sediments of the intertidal support good examples of communities that are moderately exposed to wave action. A well-defined talitrid zone in the upper shore gives way to an intertidal, mid-shore zone with sparse epifauna or infauna. On the lower shore, the tubes of the deposit-feeding terebellid worm *Lanice conchilega* are common. Small crustaceans, nereid and cirratulid polychaete worms (*Arenicola marina*, *Hediste diversicolor*) and bivalves (*Cerastoderma edule*, *Angulus tenuis* and *Macoma balthica*) are present. The area has the country's only recorded example of the littoral community characterised by *Fucus serratus* with ascidians, sponges and red seaweeds on tide-swept lower eulittoral mixed substrata. The rare sea urchin *Paracentrotus lividus* and the foliose red alga *Phyllophora sicula* are present at Finavarra, with the red alga *Rhodomyenia delicatula* and the rare brown alga *Ascophyllum nodosum* var. *mackii*, occurring in Kinvara and Muckinish Bays (NPWS, 2006g).

The substrate consists of bedrock, mud with rock and mixed substrates (Figure 6). *Pelvetia canaliculata* and *F. spiralis* occurred on the upper shore, while *F. vesiculosus* and *Ascophyllum nodosum* occurred on the mid to low shore with *F. serratus* on the lower shore. *Ulva* sp. was also recorded on the lower shore. Fauna of the upper *Ascophyllum nodosum* band were: *Spirorbis* sp., amphipods, *Patella vulgata*, *Arenicola* sp., *Littorina obtusata*, barnacles, *L. littorea*, *Actinia equina* and *Carcinus maenas*. Mid-band fauna were *Spirorbis* sp., *L. obtusata*, *L. littorea*, sponge, barnacles and *C. maenas*. Fauna of the lower band were *Spirorbis*, *L. littorea*, *C. maenas*, hydroids, *Mytilus edulis*, bryozoans and barnacles.

Sublittorally, the area has several important communities, such as Ireland's only reported piddock bed, which occurs in the shallows of Aughinish Bay, along with the rare sponge *Mycale contarenii*, which is also found there. An extensive maerl bed of *Phymatolithon calcareum* occurs in the strong tidal currents of Muckinish Bay, with maerl also occurring off Finavarra Point and in Kinvara Bay (*Lithothamnion corallioides*, *Lithophyllum dentatum* and *Lithophyllum fasciculatum*). Oyster bed in Kinvara Bay and beds of the seagrass *Zostera* spp. off Finavarra Point are also important features. Other significant habitats include secondary maerl beds and communities strongly influenced by tidal streams (NPWS, 2006g).

Shingle and stony beaches are found throughout the site, with the best examples along the more exposed shores to the south and west of Galway City and to the north and east of Finavarra, Co. Clare. They generally occur interspersed with areas of sandy beach and/or bedrock shore. Two rare plant species are associated with the habitat: henbane *Hyoscyamus niger*, which is a threatened species



listed in the Irish Red Data Book, grows on shingle beach to the south of Lough Atalia; there are also old records for the threatened plant species sea kale *Crambe maritima* (NPWS, 2006g).

Salt marshes are frequent within Galway Bay, with both Atlantic and Mediterranean marshes well represented. A notable feature of the salt marsh habitat within this site is the presence of dwarfed brown seaweeds in the vegetation, known as “turf fucoids”. Typical species include *Fucus* spp., *A. nodosum* and *P. canaliculata*. Several locally rare vascular plant species also grow in salt marsh areas within the site including sea purslane *Halimione portulacoides* and *Puccinellia distans*, both of which are relatively rare in the western half of the country. While the intertidal harvestable areas occur below the salt marsh, there are no access points through the salt marsh. Lagoons of different types, sizes and salinities occur within Galway Bay; a habitat is given priority status in Annex I of the Habitat Directive (NPWS, 2006g).

Galway Bay is one of the most important ornithological sites in the western region. There are internationally important wintering populations of Brent goose (676) and Great Northern Diver (83). Nationally important populations of the following species are present: Lapwing (3,969), Dunlin (2,149), Golden Plover (2,030), Wigeon (1,157), Curlew (697), Black-throated Diver (25), Cormorant (266), Mute Swan (150), Teal (690), Shoveler (88), Red-breasted Merganser (249), Ringed Plover (335), Bar-tailed Godwit (447), Redshank (505), Greenshank (20) and Turnstone (182) – all figures are average peaks for the 5 seasons 1995/96-1999/00. The site has several important populations of breeding birds, most notably colonies of Common Tern (99 pairs in 1995) and Sandwich Tern (81 pairs in 1995). A large Cormorant colony occurs on Deer Island which had 205 pairs in 1985 and 300 pairs in 1989 (NPWS, 2005b).

Other bird species which occur in notable numbers include Grey Heron (102), Scaup (40), Little Grebe (35) and Long-tailed Duck (19). The bay is an important wintering site for gulls, especially Black-headed Gull (1,815), Common Gull (1,011) and Herring Gull (216). The following species also use the site: Oystercatcher (575), Mallard (200), Red-throated Diver (13), Shelduck (139), Common Scoter (79), Grey Plover (60), Black-tailed Godwit (45), Great Black-backed Gull (124) and Great Crested Grebe (16). The site provides both feeding and roost sites for most of the species, though some birds also commute to areas outside of the site (NPWS, 2005b).

Inner Galway Bay provides extensive good quality habitat for the common seal *Phoca vitulina*, which is listed in Annex II of the EU Habitats Directive. The seals use a range of haul-out sites distributed through the bay, including Rabbit Island, St. Brendan’s Island, Tawin Island, inner Oranmore Bay, Kinvara Bay, Aughinish Bay and Ballyvaughan (see Figure 9). Deer Island, located in Galway Bay, was estimated to have some 42-54 grey seals during 1980-1983 (Lyons, 2004). Maximum counts of Common seal in Oranmore Bay were 105, 122 and 159 in 2009, 2010 and 2011, respectively. Maximum counts in Kinvara Bay were 109, 113 and 130 in 2009, 2010 and 2011 respectively (NPWS, 2012b).

The site also provides an optimum habitat for the otter *Lutra lutra*, which is present within the bay.

Activities which impact Inner Galway Bay SPA (IE004031) are the reclamation of land from sea, estuary or marsh and discharges which are of a high intensity, fish/shellfish aquaculture, professional fishing, dykes, embankments, artificial beaches, general sea defence or coast protection works, walking and



horse-riding/non-motorised vehicles which are all of a medium intensity along with water pollution which is of a low intensity (NPWS, 2004b)..

Figures 7 to 13 are provided for additional context.

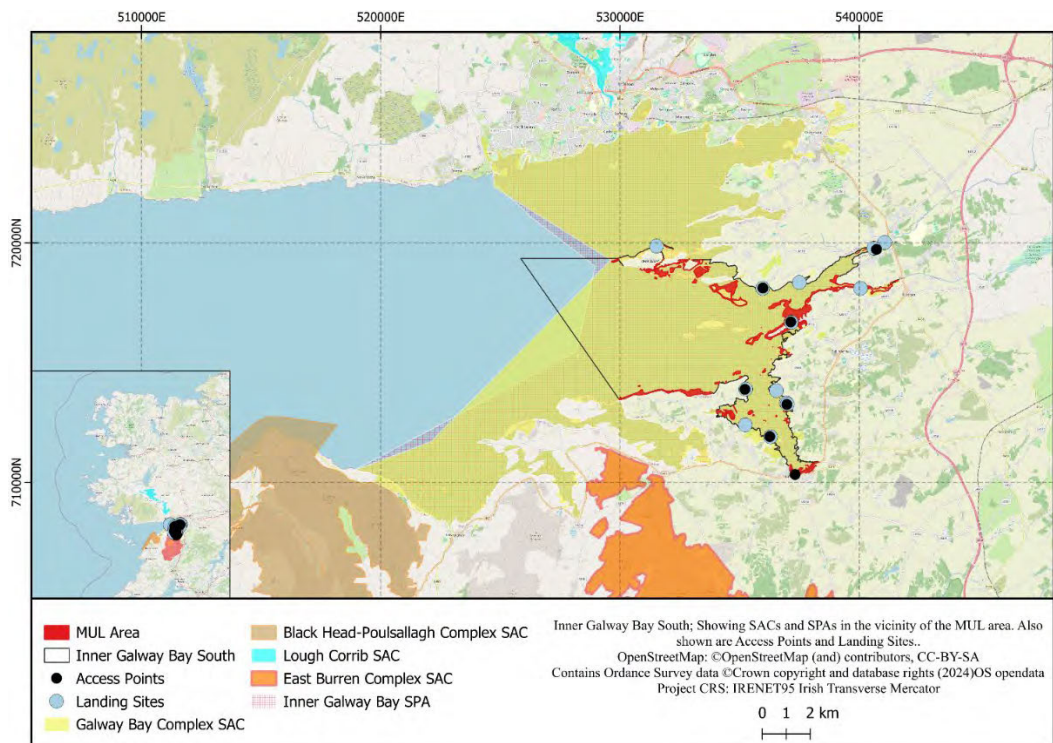


Figure 5 - Access Points, Landing Sites, SPA's and SAC's in the vicinity of Inner Galway Bay South

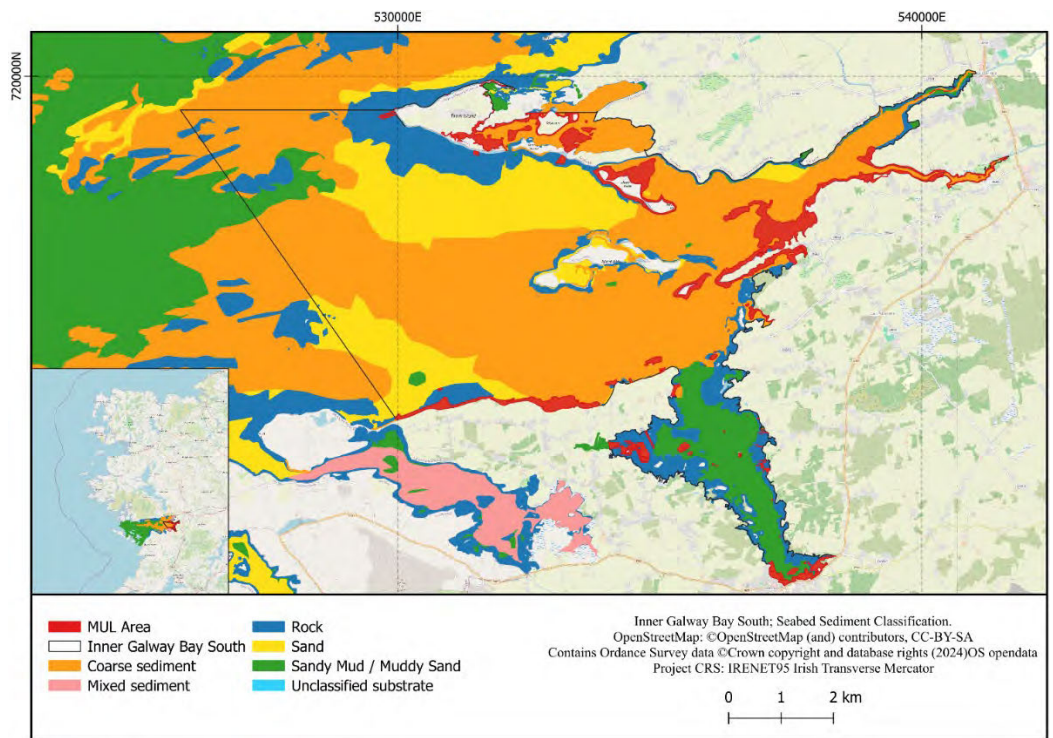


Figure 6 – Substrate Type in Inner Galway Bay South



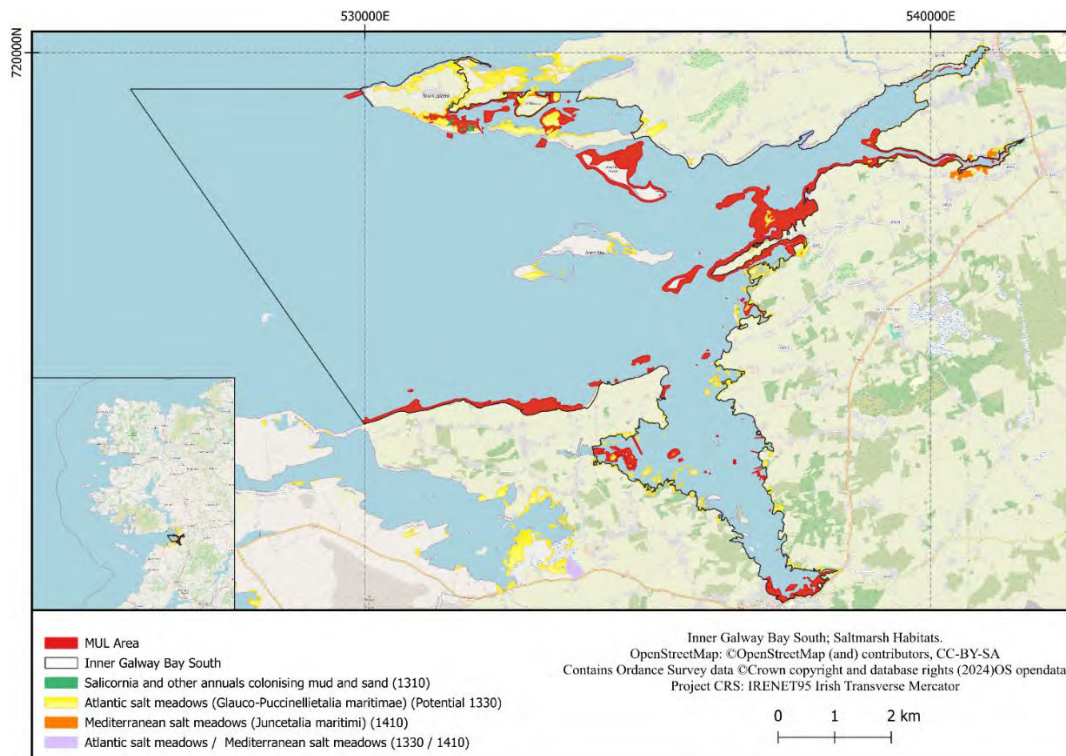


Figure 7 - Saltmarsh Habitats

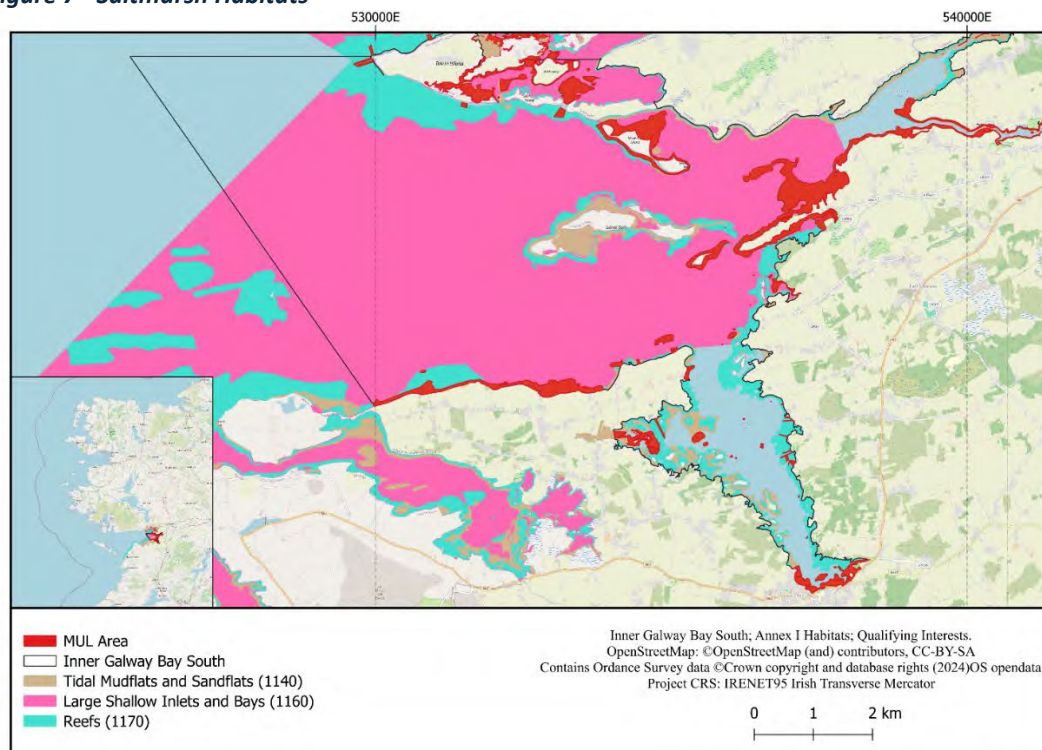


Figure 8 – Annex I Habitats in the vicinity of Inner Galway Bay South

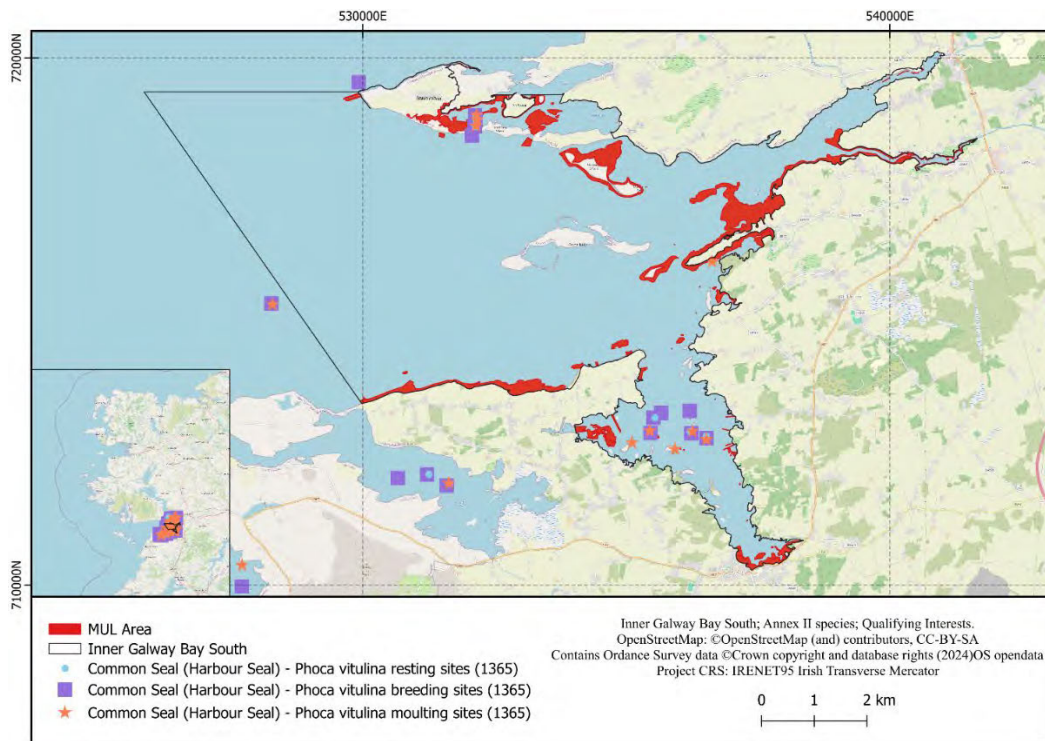


Figure 9 - Annex II Habitats in the vicinity of Galway Bay Inner South

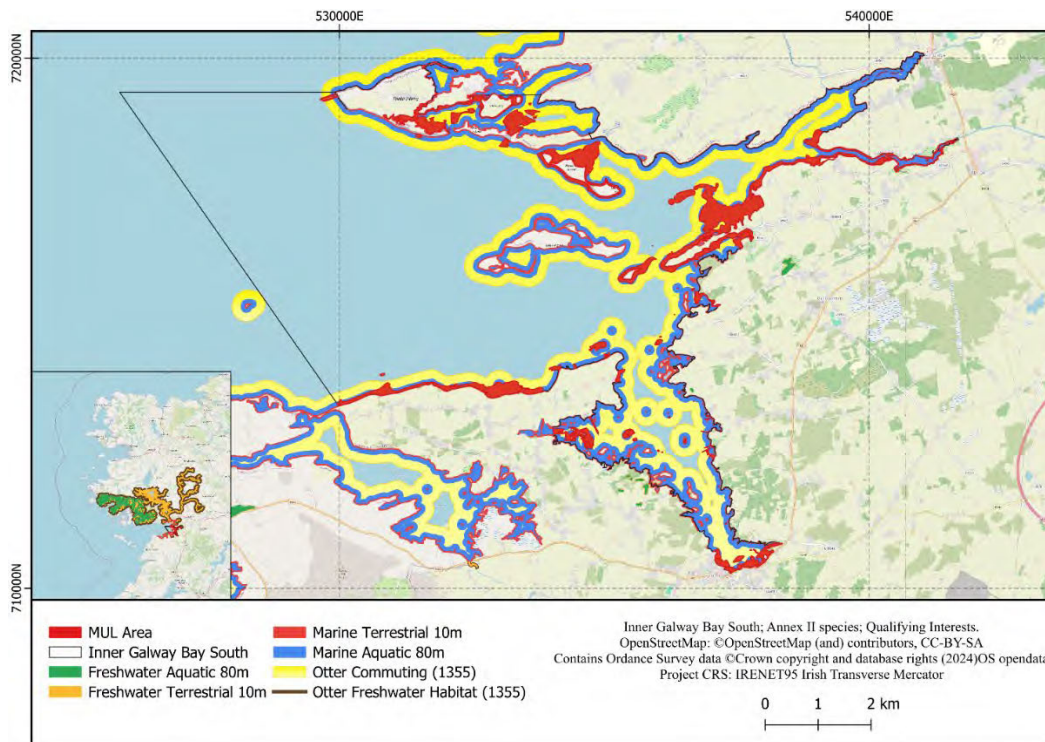


Figure 10 - Annex II Habitats (otters) in the vicinity of Galway Bay Inner South

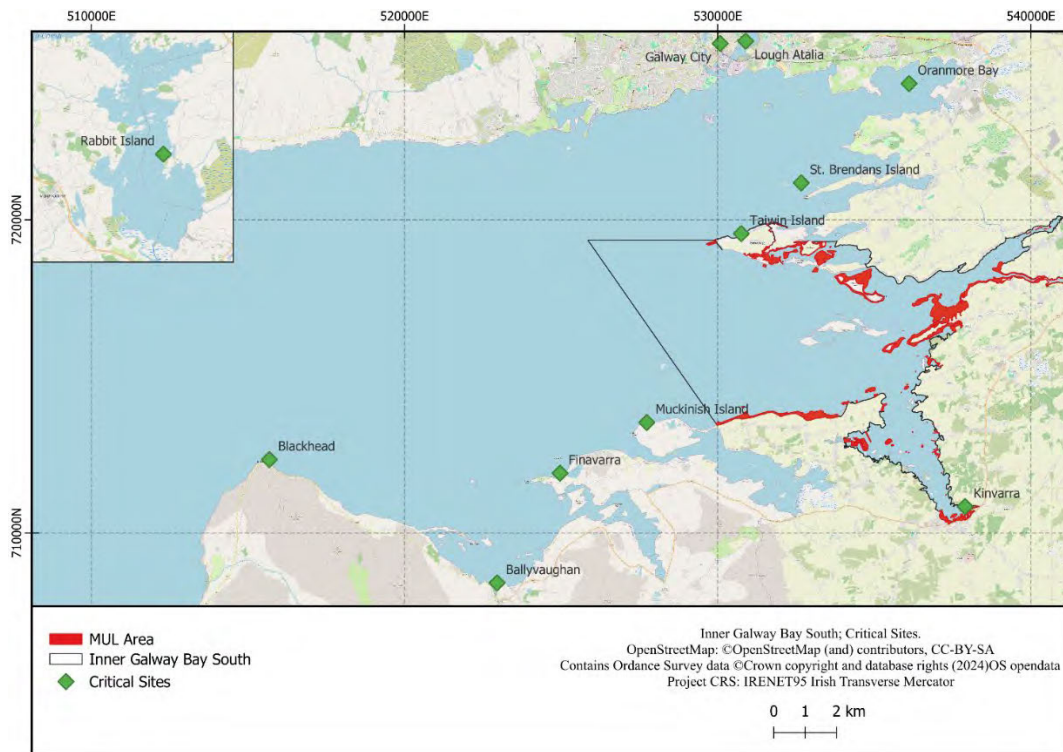


Figure 11 - Critical sites in the vicinity of Inner Galway Bay South

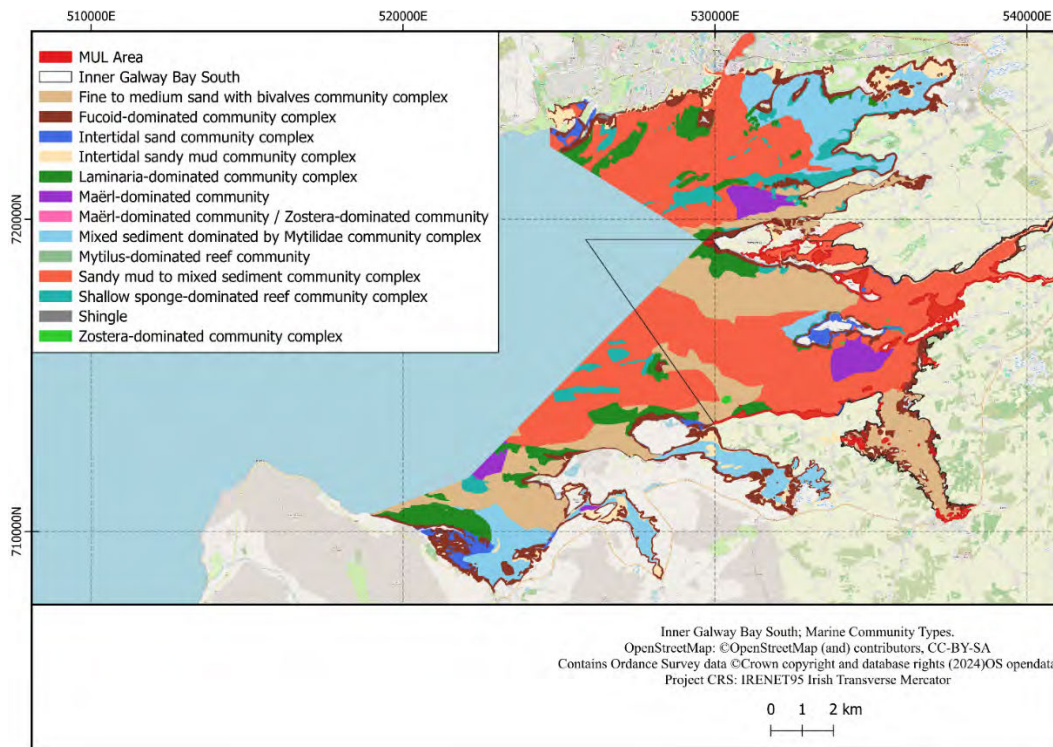


Figure 12 – Marine Community types in the vicinity of Inner Galway Bay South

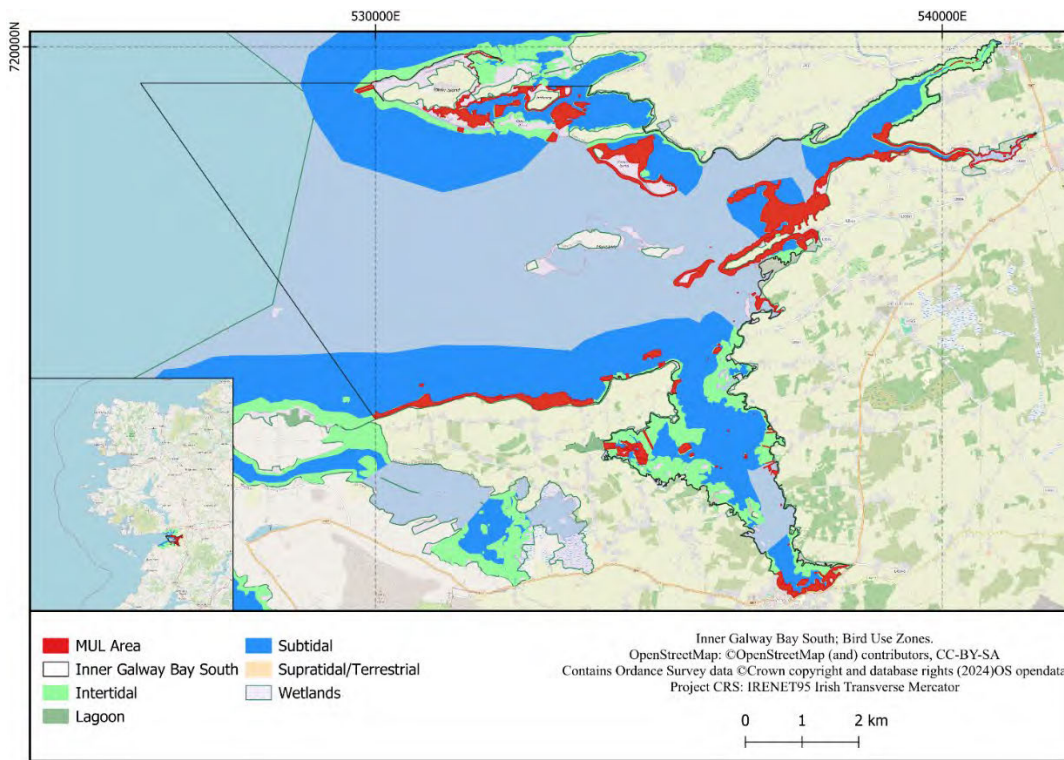


Figure 13 - Bird Use Zones of Inner Galway Bay South

4.0 STAGE 1 Screening Appraisal for Appropriate Assessment

4.1 Site Selection Process

The potential for a Natura 2000 site to be significantly affected by seaweed harvesting under Arramara Teo's licence depends on whether Qualifying Interests (QIs)/Special Conservation Interests (SCIs) of a European site:

- May come into direct interaction with harvesters.
- Are sensitive to the sustainable harvest activities to the extent that the harvest is likely to have a significant negative effect on the specific objectives of the European site.

After an extensive search, Arramara Teo has identified relevant European sites based on the following:

- Receptors which the proposed harvesting may impact.
- Determine what impact harvesting could have on sensitive receptors.
- Determine an appropriate Zone of Influence (ZOI).
- Carry out appropriate screening of relevant conservation sites within the ZOI.

Of the SACs/SPAs within the ZOI of the MUL areas, the following QIs/SCIs (Table 3) are not deemed to be relevant to the seaweed harvesting activity as they are in no way connected to the intertidal environment and will not be directly or indirectly impacted by the harvesting activity:

Habitats	Qualifying Interests
1013	Geyer's whorl snail <i>Vertigo geyeri</i>
1014	Narrow-mouthed whorl snail <i>Vertigo angustior</i>
1065	Marsh fritillary butterfly <i>Euphydryas (Eurodryas, Hypodryas) aurinia</i>
1150	*Coastal lagoons
1230	Vegetated sea cliffs of the Atlantic and Baltic coasts
1303	Lesser horseshoe bat <i>Rhinolophus hipposideros</i>
1310	<i>Salicornia</i> and other annuals colonising mud and sand
1393	Shining sickle moss <i>Drepanocladus (Hamatocaulis) vernicosus</i>
1528	Marsh saxifrage <i>Saxifraga hirculus</i>
1833	Slender naiad <i>Najas flexilis</i>
3110	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>)
3130	Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i>
3140	Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp.</i>
3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation
3160	Natural dystrophic lakes and ponds
3180	*Turloughs
3260	Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation
4010	Northern Atlantic wet heaths with <i>Erica tetralix</i>
4030	European dry heaths
4060	Alpine and Boreal heaths
5130	<i>Juniperus communis</i> formations on heaths or calcareous grasslands
6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco Brometalia</i>) (*important orchid sites)
6410	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)
6510	Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>)
7130	Blanket bogs (* if active only)
7140	Transition mires and quaking bogs
7150	Depressions on peat substrates of the <i>Rhynchosporion</i>
7210	*Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>
7220	*Petrifying springs with tufa formation (<i>Cratoneurion</i>)
7230	Alkaline fens
8110	Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>)
8210	Calcareous rocky slopes with chasmophytic vegetation
8220	Siliceous rocky slopes with chasmophytic vegetation
8240	*Limestone pavements
8310	Caves not open to the public
8330	Submerged or partly submerged sea caves
91A0	Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles
91E0	*Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)

Table 3 - QIS not deemed to be relevant to the seaweed harvesting activity

4.2 Determination of Zone of Influence: Establishing an Impact Pathway

This report evaluates the possibility of significant effects using the source-pathway-receptor model (Table 4). The "source" refers to elements of the proposed works that could potentially impact an ecological feature (receptor). The "pathway" is the route through which the source may alter the receptor. The "ecological receptor" refers to the Special Conservation Interests (SPAs) or Qualifying Interests (SACs) for which conservation objectives have been set for the European sites in question. An effect occurs when there is a linkage between the source, pathway, and receptor. The harvesting activity may result in the following:

- Removal of target species, such as *Ascophyllum* and *Fucus* biomass.
- Removal of non-target species, including associated flora like epiphytic *Vertebrata lanosa* and fauna such as *Littorina spp.*
- Uncovering of fauna, such as winkles and crabs, increasing their availability as prey.
- Desiccation of sediment from sunlight exposure, affecting infauna.
- Trampling of flora and fauna during the seaweed cutting process and collection/access/Arramara Teo personnel.
- Disturbance of fauna by harvest activities.
- Potential pollution from boats.
- Increased turbidity.



Source	Pathway	Receptor	Potential Impact
Seaweed Harvesting (Physical removal of target species)	Water	Habitat structure (rocky intertidal zone)	Alteration of habitat structure; loss of habitat complexity
		Marine species (intertidal invertebrates, fish)	Loss of shelter and feeding grounds; disruption of food web
		Protected European Sites (e.g. habitats for which Natura 2000 sites are designated, such as reefs)	Degradation of habitat quality; potential loss of conservation status
Bycatch and non-target species (Removal of non-target seaweed and marine organisms)	Dispersal	Non-target seaweed species (e.g., other macroalgae)	Reduced abundance and diversity of seaweed communities
		Marine fauna (e.g., molluscs, crustaceans)	Disruption of populations and community structure
Physical disturbance (Trampling, boat anchoring, and movement)	Hydrodynamics	Intertidal and subtidal habitats (e.g., seagrass beds, maerl beds)	Direct damage to habitats; increased sedimentation and turbidity
		Nesting and breeding sites (e.g., seabirds, fish)	Disturbance to breeding sites and nesting areas
Increased turbidity (Disturbance of sediments due to harvesting activities (boat motor))	Water	Water quality (e.g., increased turbidity)	Reduced light penetration; impacts on photosynthetic organisms
		Photosynthetic organisms (e.g., phytoplankton, other algae)	Reduced primary productivity; changes in community composition
Potential pollution (Fuel spills from boats)	Water	Marine water quality (e.g., nutrient loading, chemical contamination)	Water pollution; potential eutrophication; toxic effects on marine life
		Sensitive species (e.g., benthic invertebrates, juvenile fish)	Bioaccumulation of toxins; sub-lethal and lethal effects
Noise and vibration (Disturbance from boat engines and harvesting equipment)	Water	Marine mammals (e.g., seals, dolphins)	Behavioural changes; displacement from habitat; hearing impairment
		Seabirds (e.g., nesting birds)	Disturbance leading to nest abandonment; reduced breeding success
Uncovering previously hidden fauna (Removal of seaweed canopy exposing underlying fauna)	Exposure	Exposed marine fauna (e.g., small crustaceans, juvenile fish, molluscs)	Increased vulnerability to predators; heightened environmental stress
Desiccation of sediment (Exposure of sediment to air and sun following seaweed removal)	Exposure	Sediment-dwelling organisms (e.g., burrowing invertebrates, microbial communities)	Drying out of sediment; potential mortality of moisture-dependent organisms; changes in sediment properties
Disturbance by harvesters, boats, and tractors	Air, Water	Marine fauna (e.g., seabirds, marine mammals, benthic organisms)	Direct physical disturbance; habitat avoidance; increased stress levels

Table 4 - Source Pathway – Receptor Matrix



4.3 Zone of Influence of Seaweed Harvesting Activities

A list of Natura 2000 sites potentially affected by the proposed seaweed harvesting has been compiled, focusing on those with marine/coastal Qualifying Interests (QIs) or Special Conservation Interests (SCIs). The Zone of Influence (ZOI) for this assessment was expanded to include designated Natura 2000 sites that could be impacted to account for all potential direct, indirect and cumulative effects. (See Table 5 and Figures 14 to 20).

- Any SAC near the Screening Area assigned for Annex I habitats that the proposed works might impact.
- Any SAC assigned for mobile Annex II species that may be present within the Screening Area and impacted by the works.
- Any SPA designated for birds, including SPAs with breeding seabirds identified as SCI species, that may occur within the Screening Area and be impacted by the proposed works. The indicative breeding season mean maximum foraging ranges from Woodward et al. (2019) have been applied to identify relevant species, where the mean maximum represents the highest range reported in each study, averaged across studies.

4.4 Habitats

The Appropriate Assessment (AA) Screening identified sensitive receptors within the ZOI using the Source-Pathway-Receptor (SPR) model. For habitats like mudflats, reefs, and large shallow inlets and bays, the ZOI is confined to the Bay.

4.5 Marine Mammals

The ZOI extends to their respective Management Units (MUs) for mobile species such as Common bottlenose dolphins and Harbour porpoises. See supplemental Annex IV Species at Risk Assessment Report. ZOI considerations for highly mobile species, like cetaceans, pinnipeds, and mustelids, are based on the latest empirical evidence of foraging ranges, ensuring comprehensive coverage of potential impacts.

- **Cetaceans:** The published Management Unit (MU) for Harbour porpoise (*Phocoena phocoena*) and Common bottlenose dolphin (*Tursiops truncatus*) (IAMMWG, 2023).
- **Pinnipeds:** Grey seal (*Halichoerus grypus*) foraging range is a maximum of 448 km, while the Harbour (common) seal (*Phoca vitulina*) maximum foraging range is 273 km (Carter et al. 2022).
- **Mustelids:** Otters regularly commute up to 500m across open water.

Using this approach, all proposed project components were examined to identify potential pathways and receptors that could be impacted, allowing for the establishment of a ZOI. This process included the following steps:

- They are identifying sources of potential impacts and their pathways from the proposed project site to European Sites.
- Consider sensitive receptors and their dependent ecosystems within the European sites.
- They identify and characterise project-related impacts and their likely direct, indirect and cumulative effects on the identified sensitive receptors.



Species/Habitat	Potential Impact	Zone of Influence (ZOI)	Associated Habitat
Benthic habitats			
Reefs, mudflats, etc.	Removal of material	Within the bay	
Cetaceans			
Harbour porpoise (<i>Phocoena phocoena</i>)	Underwater noise / physical disturbance	Celtic and Irish Sea MU (IAMMWG, 2023)	Harbour porpoises (<i>Phocoena phocoena</i>) are found year-round in Irish coastal waters, particularly in shallow bays, estuaries, and nearshore areas, where they feed on small fish and invertebrates. Sightings are common throughout the year, with notable concentrations in spring and late summer (<i>Berrow et al. 2008</i>).
Bottlenose dolphin (<i>Tursiops truncatus</i>)		Irish Sea and offshore Channel and SW England	Bottlenose dolphins (<i>Tursiops truncatus</i>) are present year-round in Irish waters, particularly in coastal areas, estuaries, and bays, where they are often seen in small groups. They are most frequently observed along the western and southern coasts, with higher activity noted during the warmer months from spring through autumn (<i>Ingram & Rogan, 2002</i>).
Mustelids			
European otter (<i>Lutra lutra</i>)	Underwater noise / physical disturbance	500m	The European otter (<i>Lutra lutra</i>) is found throughout Ireland, inhabiting a variety of aquatic habitats, including rivers, lakes, estuaries, and coastal areas. Otters are active year-round and are primarily nocturnal or crepuscular, with their activity influenced by food availability and seasonal water conditions. They are common along the west coast but are also distributed inland, favouring areas with dense vegetation for cover (<i>Bailey et al. 2013</i>).
Pinnipeds			
Grey seal (<i>Halichoerus grypus</i>)	Underwater noise / physical disturbance	448 km (<i>Carter et al. 2022</i>)	Grey seals (<i>Halichoerus grypus</i>) are present year-round in Irish coastal waters, with key habitats including rocky shorelines, islands, and estuaries. They haul out onshore to rest, breed, and moult, with the breeding season typically occurring from September to December. Grey seals are frequently observed along the west and southwest coasts, where they form colonies on isolated islands and undisturbed beaches (<i>Cronin et al. 2014</i>).
Harbour (common) seal (<i>Phoca vitulina</i>)		273 km (<i>Carter et al. 2022</i>)	Harbour seals (<i>Phoca vitulina</i>) are found year-round in Irish coastal waters, particularly in sheltered bays, estuaries, and intertidal areas. They come ashore, or haul out, regularly to rest, breed, and moult, with the pupping season typically occurring in June and July, followed by moulting in August. Harbour seals are most observed along Ireland's west and south coasts (<i>Duck & Morris, 2013</i>).

Table 5 - Zone of Influence of potentially impacted mobile species and habitats



Species/Habitat	Potential Impact	Zone of Influence (ZOI)	Associated Habitat
Marine Fish			
Sea lamprey (<i>Petromyzon marinus</i>)	Underwater noise / physical disturbance	35 km	Sea lamprey (<i>Petromyzon marinus</i>) migrate into Irish waters from the ocean to freshwater rivers for spawning, typically entering estuaries and coastal areas in late spring to early summer. The peak migration period occurs between April and July, after which they move into rivers to spawn in suitable gravel habitats (King & Roche, 2008).
River lamprey (<i>Lampetra fluviatilis</i>)			River lamprey (<i>Lampetra fluviatilis</i>) migrate from estuarine and coastal environments into freshwater rivers in Ireland to spawn. This migration generally occurs in late autumn and winter, with peak movement between November and February, when they seek suitable spawning grounds in gravelly riverbeds (King & Linnane, 2004).
Twaite shad (<i>Alosa fallax fallax</i>) *			Twaite shad (<i>Alosa fallax fallax</i>) is present in Irish waters as they migrate annually from marine environments to freshwater rivers to spawn. They typically enter estuaries and coastal waters in late spring, with peak migration occurring from April to June, before moving upriver to spawn in flowing, shallow river habitats (Maitland & Hatton-Ellis, 2003).
Allis shad (<i>Alosa alosa</i>)*			Allis shad (<i>Alosa alosa</i>) migrate into Irish waters from the sea to freshwater rivers to spawn. They typically enter estuaries and coastal areas in the spring, with peak migration between April and May, moving upstream to spawn in fast-flowing sections of rivers with gravel beds (Aprahamian & Lester, 2001).
Atlantic salmon (<i>Salmo salar</i>) **			Atlantic salmon (<i>Salmo salar</i>) migrate from oceanic habitats back to Irish freshwater rivers to spawn. They are typically present in Irish coastal and estuarine waters from spring through autumn, with peak migrations occurring between May and October. After entering coastal waters, they move upriver to reach spawning grounds in clean, gravel-bottomed streams (McCarthy et al. 2008).
Migratory Birds			
Sandwich Tern (<i>Thalasseus sandvicensis</i>)	Disturbance	34.3 km (Woodward et al. 2019)	Sandwich Terns (<i>Thalasseus sandvicensis</i>) typically forage in shallow coastal waters, including estuaries and lagoons, and sometimes over rocky intertidal zones where small fish are concentrated during tidal movements. They are known to exploit a variety of coastal habitats, adjusting their foraging strategies according to prey availability (Gochfeld et al. 2018).
Lesser Black-backed Gull (<i>Larus fuscus</i>)		127 km (Woodward et al. 2019)	Lesser Black-backed Gulls (<i>Larus fuscus</i>) frequently forage along coastal areas, including rocky intertidal zones, estuaries, and beaches, where they scavenge and hunt for a variety of prey. They are highly adaptable and use the intertidal zone to exploit food resources exposed during low tide, including small invertebrates and fish (Cramp et al. 1983).

Table 5 (cont'd) - Zone of Influence of potentially impacted mobile species and habitats



Species/Habitat	Potential Impact	Zone of Influence (ZOI)	Associated Habitat
Migratory Birds			
Common Gull (<i>Larus canus</i>)	Disturbance	50 km (Woodward et al. 2019)	Common Gulls (<i>Larus canus</i>) are often found in coastal habitats, including rocky intertidal zones, mudflats, and sandy shores, where they forage for invertebrates, small fish, and other marine organisms. They frequently exploit these areas during low tide when food resources are more accessible (Cramp et al. 1983).
Arctic Tern (<i>Sterna paradisaea</i>)		25.7 km (Woodward et al. 2019)	Arctic Terns (<i>Sterna paradisaea</i>) frequently forage in shallow coastal waters, estuaries, and sometimes along rocky shorelines where tidal movements concentrate prey. They are adept at exploiting intertidal areas, especially during low tide, for small fish and invertebrates (Hatch et al. 2020).
Cormorant (<i>Phalacrocorax carbo</i>)		25.6 km (Woodward et al. 2019)	Cormorants (<i>Phalacrocorax carbo</i>) are commonly found along coastal zones, including rocky intertidal areas, where they forage for fish and other marine prey. They are highly adaptable and frequently dive in shallow coastal waters and around rocky outcrops, taking advantage of prey availability influenced by tidal movements (Cramp & Simmons, 1977).
Herring Gull (<i>Larus argentatus</i>)		58.8 km (Woodward et al. 2019)	Herring Gulls (<i>Larus argentatus</i>) frequently forage along coastal areas, including rocky intertidal zones, mudflats, and sandy shores. They are highly opportunistic and make use of intertidal zones during low tide, scavenging or hunting for invertebrates, fish, and other available prey (Cramp & Simmons, 1983).
Shag (<i>Phalacrocorax aristotelis</i>)		13.2 km (Woodward et al. 2019)	Shags (<i>Phalacrocorax aristotelis</i>) are closely associated with rocky coastal environments, frequently foraging in intertidal and shallow subtidal zones near rocky shores. They rely on these areas to hunt for fish and other marine prey, often diving close to the shore where prey is concentrated (Cramp & Simmons, 1977).

* Species not considered as it is not a QI of relevant SACs.

** Atlantic salmon (*Salmo solar*) is not considered further as salmon is an anadromous fish that spawns in rivers and is protected under Annex II of the EU Habitats Directive only when in freshwater.

Table 5 (cont'd) - Zone of Influence of potentially impacted mobile species and habitats



4.6 Migratory Birds

Arramara Teo has applied a targeted screening approach to assess potential impacts on migratory bird species. This approach considers the Source-Pathway-Receptor (SPR) model, which refines this radius by considering species-specific foraging mobility. Due to the localised and transient nature of the seaweed harvesting activities, migratory birds from SPAs whose foraging ranges, as described by Woodward et al. (2019), overlap with the Maritime Usage Licence (MUL) area have been included in this screening.

In this screening process, SPAs are evaluated for potential ecological connectivity to the MUL area if their Special Conservation Interest (SCI) species, related habitats, or wetlands are within the foraging range or directly overlap with the project site. This connectivity is based on established criteria:

- The presence of European sites within the search area (criteria 1).
- Sites associated with qualifying mobile species whose range (such as foraging, migratory, overwintering, breeding, or natural habitat range) may interact with the MUL area (criteria 2).

Woodward et al. (2019) provided a robust, species-specific mean-maximum foraging distance dataset, which Arramara Teo has employed conservatively to encompass the foraging ranges of relevant migratory seabirds. Using Woodward et al. (2019) for foraging distances, Arramara Teo has mapped foraging zones for breeding seabirds, ensuring that these zones cover all SPAs within the range of the project area. Specifically, foraging distances are vital for assessing potential connectivity with seabird colonies during the breeding season, as seabirds operate as central-place foragers, regularly returning to nesting sites to provide for their young. During this period, the predictable foraging behaviour of seabirds allows a clear measure of impact. In contrast, non-breeding season movements are more variable and dispersed, highlighting the need for seasonal context in assessing project interactions. For seabird species during the summer breeding months, the ZOI is considered to extend to all those SPAs within the foraging range of the proposed MUL area. For wintering species, which often have shorter foraging ranges than seabirds, the mean-maximum foraging range is applied as a precautionary step.

The following Natura 2000 sites (Table 6) were screened for inclusion in the project's ZOI, considering both direct overlaps and ecological corridors or foraging paths that could enable species movements to and from the project area. This approach, prioritising scientifically grounded screening criteria, ensures that potential impacts on migratory bird species are effectively assessed and mitigated where necessary.



Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Galway Bay Complex SAC IE000268	Mudflats and sandflats not covered by seawater at low tide [1140]; Large shallow inlets and bays [1160]; Reefs [1170]; Atlantic salt meadows (Glaucopuccinellietalia maritimae) [1330]; Mediterranean salt meadows (Juncetalia maritimi) [1410]; Lutra lutra (Otter) [1355]; Phoca vitulina (Harbour seal) [1365]	Mudflats and sandflats - Seaweed harvesting is planned within the range of this habitat type, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Large shallow inlets and bays - Seaweed harvesting is planned within the range of this habitat type, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Reefs - Seaweed harvesting is planned within the range of this habitat type, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Atlantic salt meadows - Seaweed harvesting is planned within the range of this habitat type, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Mediterranean salt meadows - Seaweed harvesting is planned within the range of this habitat type, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Otter - Seaweed harvesting is planned within the range of this species, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Harbour seal - Harvesting within foraging range <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Mudflats and sandflats; Y - Large shallow inlets and bays; Y - Reefs; Y - Atlantic salt meadows; Y - Mediterranean salt meadows; Y - Otter; Y - Harbour seal

Table 6 - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Galway Bay Complex SAC IE000268	Coastal lagoons [1150]; Perennial vegetation of stony banks [1220]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Salicornia and other annuals colonising mud and sand [1310]; Turloughs [3180]; Juniperus communis formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210]; Alkaline fens [7230]; Limestone pavements [8240]	No Source-Pathway-Receptor link.	N - Coastal lagoons; N - Perennial vegetation of stony banks; N - Vegetated sea cliffs; N - Salicornia; N - Turloughs; N - Juniperus communis formations; N - Semi-natural dry grasslands; N - Calcareous fens; N - Alkaline fens; N - Limestone pavements
Black Head-Poulsallagh Complex SAC IE000020		Reefs - Seaweed harvesting is planned within the range of this habitat type, introducing the possibility of direct disturbance from manual harvesters as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts	Y – Reefs
	Reefs [1170]; Perennial vegetation of stony banks [1220]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Water courses of plain to montane levels with the Ranunculus fluitantis and Callitriche-Batrachion vegetation [3260]; Alpine and Boreal heaths [4060]; Juniperus communis formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) [6510]; Petrifying springs with tufa formation (Cratoneurion) [7220]; Limestone pavements [8240]; Submerged or partially submerged sea caves [8330]; Petalophyllum ralfsii (Petalwort) [1395]	No Source-Pathway-Receptor link.	Y – Reefs; N - Perennial vegetation; N - Grey dunes; N - Water courses; N - Alpine and Boreal heaths; N - Juniperus communis formations; N - Semi-natural dry grasslands; N - Lowland hay meadows; N - Petrifying springs; N - Limestone pavements; N - Submerged sea caves; N - Petalwort

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Connemara Bog Complex SAC IE002034	Reefs [1170]; Coastal lagoons [1150]; Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]; Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130]; Natural dystrophic lakes and ponds [3160]; Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260]; Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]; European dry heaths [4030]; Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>) [6410]; Blanket bogs (* if active bog) [7130]; Transition mires and quaking bogs [7140]; Depressions on peat substrates of the <i>Rhynchosporion</i> [7150]; Alkaline fens [7230]; Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]; <i>Euphydryas aurinia</i> (Marsh Fritillary) [1065]; <i>Salmo salar</i> (Salmon) [1106]; <i>Lutra lutra</i> (Otter) [1355]; <i>Najas flexilis</i> (Slender Naiad) [1833]	No Source-Pathway-Receptor link.	N - Reefs; N - Coastal lagoons; N - Oligotrophic waters; N - Oligotrophic to mesotrophic waters; N - Natural dystrophic lakes and ponds; N - Water courses; N - Northern Atlantic wet heaths; N - European dry heaths; N - Molinia meadows; N - Blanket bogs; N - Transition mires; N - Depressions on peat; N - Alkaline fens; N - Old sessile oak; N - Marsh Fritillary; N - Salmon; N - Slender Naiad; N - Otter
East Burren Complex SAC IE001926	Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp. [3140]; Turloughs [3180]; Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260]; Alpine and Boreal heaths [4060]; <i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]; Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]; Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510]; Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210]; Petrifying springs with tufa formation (<i>Cratoneurion</i>) [7220]; Alkaline fens [7230]; Limestone pavements [8240]; Caves not open to the public [8310]; Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0]; <i>Euphydryas aurinia</i> (Marsh Fritillary) [1065]; <i>Rhinolophus hipposideros</i> (Lesser Horseshoe Bat) [1303]; <i>Lutra lutra</i> (Otter) [1355]	No Source-Pathway-Receptor link.	N - Hard oligo-mesotrophic waters; N - Turloughs; N - Water courses; N - Alpine and Boreal heaths; N - <i>Juniperus communis</i> formations; N - Calaminarian grasslands; N - Semi-natural dry grasslands; N - Lowland hay meadows; N - Calcareous fens; N - Petrifying springs; N - Alkaline fens; N - Limestone pavements; N - Caves not open to the public; N - Alluvial forests; N - Marsh Fritillary; N - Lesser Horseshoe Bat; N - Otter

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Dromore Woods and Loughs SAC IE000032	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]; Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]; Limestone pavements [8240]; Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]; Lutra lutra (Otter) [1355]	No Source-Pathway-Receptor link.	N - Natural eutrophic lakes; N - Hydrophilous tall herb fringe communities; N - Limestone pavements; N - Lesser Horseshoe Bat; N - Otter
Moyree River System SAC IE000057	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]; Alkaline fens [7230]; Limestone pavements [8240]; Caves not open to the public [8310]; Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]; Lutra lutra (Otter) [1355]	No Source-Pathway-Receptor link.	N - Water courses; N - Alkaline fens; N - Limestone pavements; N - Caves not open to the public; N - Lesser Horseshoe Bat; N - Otter
Lough Corrib SAC IE000297	Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]; Salmo salar (Salmon) [1106]; Lutra lutra (Otter) [1355]	Freshwater Pearl Mussel - Direct effects of accidental hydrocarbon pollution; Salmon - possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts; Otter - Seaweed harvesting is planned within the range of this species type, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for habitat fragmentation and water quality impacts associated with boat usage has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts.	Y - Freshwater Pearl Mussel; Y – Salmon; Y – Otter

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Lough Corrib SAC IE000297	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]; Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]; Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140]; Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]; Active raised bogs [7110]; Degraded raised bogs still capable of natural regeneration [7120]; Depressions on peat substrates of the Rhynchosporion [7150]; Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210]; Petrifying springs with tufa formation (Cratoneurion) [7220]; Alkaline fens [7230]; Limestone pavements [8240]; Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]; Bog woodland [91D0]; Austropotamobius pallipes (White-clawed Crayfish) [1092]; Petromyzon marinus (Sea Lamprey) [1095]; Lampetra planeri (Brook Lamprey) [1096]; Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]; Najas flexilis (Slender Naiad) [1833]; Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]	No Source-Pathway-Receptor link.	N - Oligotrophic waters; N - Oligotrophic to mesotrophic standing waters; N - Hard oligo-mesotrophic waters; N - Water courses; N - Semi-natural dry grasslands; N - Molinia meadows; N - Active raised bogs; N - Degraded raised bogs; N - Depressions on peat; N - Calcareous fens; N - Petrifying springs; N - Alkaline fens; N - Limestone pavements; N - Old sessile oak woods; N - Bog woodland; N - White-clawed Crayfish; N - Sea Lamprey; N - Brook Lamprey; N - Lesser Horseshoe Bat; N - Slender Naiad; N - Slender Green Feather-moss
St. John's Point SAC IE000191	Large shallow inlets and bays [1160]; Reefs [1170]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]; Alkaline fens [7230]; Limestone pavements [8240]; Submerged or partially submerged sea caves [8330]; Euphydryas aurinia (Marsh Fritillary) [1065]; Tursiops truncatus (Common bottlenose dolphin) [1349]	No Source-Pathway-Receptor link.	N - Large shallow inlets and bays; N - Reefs; N - Vegetated sea cliffs; N - Semi-natural dry grasslands; N - Molinia meadows; N - Alkaline fens; N - Limestone pavements; N - Submerged sea caves; N - Marsh Fritillary; N - Bottlenose dolphin
Belgica Mound Province SAC IE002327	Reefs [1170]; Tursiops truncatus (Common bottlenose dolphin) [1349]; Phocoena phocoena (Harbour porpoise) [1351]	No Source-Pathway-Receptor link.	N - Reefs; N - Common Bottlenose dolphin; N - Harbour porpoise
Codling Fault Zone SAC IE003015	Submarine structures made by leaking gases [1180]; Phocoena phocoena (Harbour porpoise) [1351]	No Source-Pathway-Receptor link.	N - Submarine structures; N - Harbour porpoise

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Kilkieran Bay and Islands SAC IE002111	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Mudflats and sandflats not covered by seawater at low tide [1140]; Coastal lagoons [1150]; Large shallow inlets and bays [1160]; Reefs [1170]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; Machairs (* in Ireland) [21A0]; Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]; Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510]; Harbour porpoise <i>Phocoena phocoena</i> [1351]; Otter <i>Lutra lutra</i> [1355]; <i>Najas flexilis</i> (Slender Naiad) [1833]	No Source-Pathway-Receptor link.	N - Mudflats and sandflats; N - Coastal lagoons; N - Large shallow inlets and bays; N - Reefs; N - Atlantic salt meadows; N - Mediterranean salt meadows; N - Machairs; N - Oligotrophic to mesotrophic standing waters; N - Lowland hay meadows; N - Harbour porpoise; N - Otter; N - Slender Naiad
Slyne Head Peninsula SAC IE002074	Coastal lagoons [1150]; Large shallow inlets and bays [1160]; Reefs [1170]; Annual vegetation of drift lines [1210]; Perennial vegetation of stony banks [1220]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Machairs (* in Ireland) [21A0]; Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]; Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]; Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp. [3140]; European dry heaths [4030]; <i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]; <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]; Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510]; Alkaline fens [7230]; Petalwort <i>Petalophyllum ralfsii</i> [1395]; <i>Tursiops truncatus</i> (Common bottlenose dolphin) [1349]; <i>Najas flexilis</i> (Slender Naiad) [1833]	No Source-Pathway-Receptor link.	N - Coastal lagoons; N - Large shallow inlets and bays; N - Reefs; N - Annual drift lines; N - Perennial vegetation of stony banks; N - Atlantic salt meadows; N - Mediterranean salt meadows; N - Embryonic dunes; N - White dunes; N - Machairs; N - Oligotrophic waters; N - Oligotrophic to mesotrophic standing waters; N - Hard oligo-mesotrophic waters; N - European dry heaths; N - <i>Juniperus communis</i> formations; N - Semi-natural dry grasslands; N - <i>Molinia</i> meadows; N - Lowland hay meadows; N - Alkaline fens; N - Petalwort; N - Common bottlenose dolphin; N - Slender Naiad

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Glengarriff Harbour and Woodland SAC IE000090	<i>Phoca vitulina</i> (Harbour seal) [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y – Harbour seal
	Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]; Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]; Geomalacus maculosus (Kerry Slug) [1024]; Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]; <i>Lutra lutra</i> (Otter) [1355]	No Source-Pathway-Receptor link.	N - Old sessile oak; N - Alluvial forests; N - Kerry Slug; N - Lesser Horseshoe Bat; N – Otter
Slaney River Valley SAC IE000781	<i>Phoca vitulina</i> (Harbour seal) [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y – Harbour seal
	Estuaries [1130]; Mudflats and sandflats not covered by seawater at low tide [1140]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]; Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]; Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]; Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]; <i>Petromyzon marinus</i> (Sea Lamprey) [1095]; <i>Lampetra planeri</i> (Brook Lamprey) [1096]; <i>Lampetra fluviatilis</i> (River Lamprey) [1099]; <i>Alosa fallax fallax</i> (Twaite Shad) [1103]; Salmo salar (Salmon) [1106]; <i>Lutra lutra</i> (Otter) [1355]	No Source-Pathway-Receptor link.	N – Estuaries; N – Mudflats; N – Atlantic salt meadows; N – Mediterranean salt meadows; N - Water courses; N - Old sessile oak; N - Alluvial forests; N - Freshwater Pearl Mussel; N – Sea Lamprey; N – Brook Lampreys; N – River Lampreys; N – Twaite Shad; N – Salmon; N - Otter
Slyne Head Islands SAC IE000328	Reefs [1170]; Grey seal <i>Halichoerus grypus</i> [1364]; <i>Tursiops truncatus</i> (Common bottlenose dolphin) [1349]	No Source-Pathway-Receptor link.	N - Reefs; N - Grey seal; N - Common bottlenose dolphin
West Connacht Coast SAC IE002998	Common bottlenose dolphin <i>Tursiops truncatus</i> [1349]; Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Common bottlenose dolphin; N - Harbour porpoise
Inishkea Islands SAC IE000507	Machairs (* in Ireland) [21A0]; Grey seal <i>Halichoerus grypus</i> [1364]; Petalwort <i>Petalophyllum ralfsii</i> [1395]	No Source-Pathway-Receptor link.	N - Machairs; N - Grey seal; N - Petalwort

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Clew Bay Complex SAC IE001482	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Mudflats and sandflats not covered by seawater at low tide [1140]; Coastal lagoons [1150]; Large shallow inlets and bays [1160]; Annual vegetation of drift lines [1210]; Perennial vegetation of stony banks [1220]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]; Embryonic shifting dunes [2110]; Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Machairs (* in Ireland) [21A0]; Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]; Otter <i>Lutra lutra</i> [1355]	No Source-Pathway-Receptor link.	N - Mudflats and sandflats; N - Coastal lagoons; N - Large shallow inlets and bays; N - Annual vegetation of drift lines; N - Perennial vegetation of stony banks; N - Atlantic salt meadows; N - Embryonic dunes; N - White dunes; N - Machairs; N - Old sessile oak woods; N - Otter
Lower River Shannon SAC IE002165	Sandbanks which are slightly covered by sea water all the time [1110]; Estuaries [1130]; Mudflats and sandflats not covered by seawater at low tide [1140]; Coastal lagoons [1150]; Large shallow inlets and bays [1160]; Reefs [1170]; Perennial vegetation of stony banks [1220]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Salicornia and other annuals colonising mud and sand [1310]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260]; <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>) [6410]; Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0]; <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]; <i>Petromyzon marinus</i> (Sea Lamprey) [1095]; <i>Lampetra planeri</i> (Brook Lamprey) [1096]; <i>Lampetra fluviatilis</i> (River Lamprey) [1099]; <i>Salmo salar</i> (Salmon) [1106]; <i>Tursiops truncatus</i> (Common bottlenose dolphin) [1349]; <i>Lutra lutra</i> (Otter) [1355]	No Source-Pathway-Receptor link.	N - Sandbanks; N - Estuaries; N - Mudflats and sandflats; N - Coastal lagoons; N - Large shallow inlets and bays; N - Reefs; N - Perennial vegetation; N - Vegetated sea cliffs; N - Salicornia; N - Atlantic salt meadows; N - Mediterranean salt meadows; N - Water courses; N - <i>Molinia</i> meadows; N - Alluvial forests; N - Freshwater Pearl Mussel; N - Sea Lamprey; N - Brook Lamprey; N - River Lamprey; N - Salmon; N - Bottlenose dolphin; N - Otter
Duvillaun Islands SAC IE000495	Grey seal <i>Halichoerus grypus</i> [1364]; <i>Tursiops truncatus</i> (Common bottlenose dolphin) [1349]	No Source-Pathway-Receptor link.	N - Grey seal; N - Common bottlenose dolphin

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Blasket Islands SAC IE002172	Reefs [1170]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; European dry heaths [4030]; Submerged or partially submerged sea caves [8330]; Harbour porpoise <i>Phocoena phocoena</i> [1351]; Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Reefs; N - Vegetated sea cliffs; N - European dry heaths; N - Submerged sea caves; N - Harbour porpoise; N - Grey seal
Inishbofin and Inishshark SAC IE000278	Coastal lagoons [1150]; Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]; Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]; European dry heaths [4030]; Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Coastal lagoons; N - Oligotrophic waters; N - Northern Atlantic wet heaths; N - European dry heaths; N - Grey seal
Roaringwater Bay and Islands SAC IE00101	Large shallow inlets and bays [1160]; Reefs [1170]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; European dry heaths [4030]; Submerged or partially submerged sea caves [8330]; Harbour porpoise <i>Phocoena phocoena</i> [1351]; Otter <i>Lutra lutra</i> [1355]; Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Large shallow inlets and bays; N - Reefs; N - Vegetated sea cliffs; N - European dry heaths; N - Submerged sea caves; N - Harbour porpoise; N - Otter; N - Grey seal
Rockabill to Dalkey SAC IE003000	Reefs [1170]; Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Reefs; N - Harbour porpoise
Kenmare River SAC IE002158	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Large shallow inlets and bays [1160]; Reefs [1170]; Perennial vegetation of stony banks [1220]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; European dry heaths [4030]; Juniperus communis formations on heaths or calcareous grasslands [5130]; Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]; Submerged or partially submerged sea caves [8330]; <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]; <i>Rhinolophus hipposideros</i> (Lesser Horseshoe Bat) [1303]; <i>Phocoena phocoena</i> (Harbour Porpoise) [1351]; Otter <i>Lutra lutra</i> [1355]	No Source-Pathway-Receptor link.	N - Large shallow inlets and bays; N - Reefs; N - Perennial vegetation of stony banks; N - Vegetated sea cliffs; N - Atlantic salt meadows; N - Mediterranean salt meadows; N - White dunes; N - Grey dunes; N - European dry heaths; N - Juniperus communis formations; N - Calaminarian grasslands; N - Submerged sea caves; N - Narrow-mouthed Whorl Snail; N - Lesser Horseshoe Bat; N - Harbour Porpoise; N - Otter

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Lambay Island SAC IE000204	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Reefs [1170]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; <i>Phocoena phocoena</i> (Harbour porpoise) [1351]; Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Reefs; N - Vegetated sea cliffs; N - Harbour porpoise; N - Grey seal
Blackwater Bank SAC IE002953	Sandbanks which are slightly covered by sea water all the time [1110]; <i>Phocoena phocoena</i> (Harbour porpoise) [1351]	No Source-Pathway-Receptor link.	N – Sandbanks; N - Harbour porpoise
Bunduff Lough and Machair/Trawalua/Mullaghmore SAC IE000625	Mudflats and sandflats not covered by seawater at low tide [1140]; Large shallow inlets and bays [1160]; Reefs [1170]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Humid dune slacks [2190]; Machairs (* in Ireland) [21A0]; Juniperus communis formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Alkaline fens [7230]; Euphydrys aurinia (Marsh Fritillary) [1065]; <i>Phocoena phocoena</i> (Harbour porpoise) [1351]; <i>Petalophyllum ralfsii</i> (Petalwort) [1395]	No Source-Pathway-Receptor link.	N - Mudflats and sandflats; N - Large shallow inlets and bays; N - Reefs; N - White dunes; N - Grey dunes; N - Humid dune slacks; N - Machairs; N - Juniperus communis formations; N - Semi-natural dry grasslands; N - Alkaline fens; N - Marsh Fritillary; N - Harbour porpoise; N – Petalwort
Carnsore Point SAC IE002269	Mudflats and sandflats not covered by seawater at low tide [1140]; Reefs [1170]; <i>Phocoena phocoena</i> (Harbour porpoise) [1351]	No Source-Pathway-Receptor link.	N - Mudflats and sandflats; N – Reefs; N - Harbour porpoise
Ballysadare Bay SAC IE000622	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Estuaries [1130]; Mudflats and sandflats not covered by seawater at low tide [1140]; Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Humid dune slacks [2190]; <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]	No Source-Pathway-Receptor link.	N - Estuaries; N - Mudflats and sandflats; N - Embryonic dunes; N - White dunes; N - Grey dunes; N - Humid dune slacks; N - Narrow-mouthed Whorl Snail

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC IE000627	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Estuaries [1130]; Mudflats and sandflats not covered by seawater at low tide [1140]; Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes)* [2130]; Juniperus communis formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Petrifying springs with tufa formation (Cratoneurion) [7220]; Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]; Petromyzon marinus (Sea Lamprey) [1095]; Lampetra fluviatilis (River Lamprey) [1099]	No Source-Pathway-Receptor link.	N - Estuaries; N - Mudflats and sandflats; N - Embryonic dunes; N - White dunes; N - Grey dunes; N - Juniperus communis formations; N - Semi-natural dry grasslands; N - Petrifying springs; N - Narrow-mouthed Whorl Snail; N - Sea Lamprey; N - River Lamprey
Inishmore Island SAC IE000213	Reefs [1170]; Perennial vegetation of stony banks [1220]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Dunes with <i>Salix repens ssp. argentea</i> (<i>Salicion arenariae</i>) [2170]; Humid dune slacks [2190]; Machairs (* in Ireland) [21A0]; European dry heaths [4030]; Alpine and Boreal heaths [4060]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]; Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510]; Limestone pavements [8240]; Submerged or partially submerged sea caves [8330]; Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]; <i>Phocoena phocoena</i> (Harbour porpoise) [1351]	No Source-Pathway-Receptor link.	N - Coastal lagoons; N - Reefs; N - Perennial vegetation; N - Vegetated sea cliffs; N - Embryonic White dunes; N - White dunes; N - Grey dunes; N - Salix dunes; N - Humid dunes; N - Machairs; N - European dry heaths; N - Alpine and Boreal heaths; N - Semi-natural dry grasslands; N - Lowland hay meadows; N - Limestone pavements; N - submerged sea caves; N - Narrow-mouthed Whorl Snail; N - Harbour porpoise

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Donegal Bay (Murvagh) SAC IE000133	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Mudflats and sandflats not covered by seawater at low tide [1140]; Fixed coastal dunes with herbaceous vegetation ('grey dunes') [2130]; Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]; Humid dune slacks [2190]	No Source-Pathway-Receptor link.	N - Mudflats and sandflats; N - Grey dunes; N – Salix dunes; N - Humid dune slacks
Horn Head and Rinclevan SAC IE000147	Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes)* [2130]; Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]; Humid dune slacks [2190]; Machairs (* in Ireland) [21A0]; Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]; Vertigo geyeri (Geyer's Whorl Snail) [1013]; Grey seal <i>Halichoerus grypus</i> [1364]; Petalwort <i>Petalophyllum ralfsii</i> [1395]; <i>Najas flexilis</i> (Slender Naiad) [1833]	No Source-Pathway-Receptor link.	N - Embryonic dunes; N - White dunes; N - Grey dunes; N - Salix dunes; N - Humid dunes; N – Machairs; N - Oligotrophic to mesotrophic standing waters; N - Geyer's Whorl Snail; N - Grey seal; N - Petalwort; N - Slender Naiad
Killala Bay/Moy Estuary SAC IE000458	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y – Harbour seal
	Estuaries [1130]; Mudflats and sandflats not covered by seawater at low tide [1140]; Annual vegetation of drift lines [1210]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Salicornia and other annuals colonising mud and sand [1310]; Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) [1330]; Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Humid dune slacks [2190]; Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]; Sea Lamprey <i>Petromyzon marinus</i> [1095]	No Source-Pathway-Receptor link.	N - Estuaries; N - Mudflats and sandflats; N - Annual vegetation of drift lines; N - Vegetated sea cliffs; N – Salicornia; N - Atlantic salt meadows; N - Embryonic dunes; N - White dunes; N - Fixed dunes; N - Humid dunes; N - Narrow-mouthed Whorl Snail; N - Sea Lamprey

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Rutland Island and Sound SAC IE002283	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Coastal lagoons [1150]; Large shallow inlets and bays [1160]; Reefs [1170]; Annual vegetation of drift lines [1210]; Embryonic shifting dunes [2110]; Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Humid dune slacks [2190]	No Source-Pathway-Receptor link.	N - Coastal lagoons; N - Large shallow inlets and bays; N - Reefs; N - Annual vegetation of drift lines; N - Embryonic dunes; N - White dunes; N - Grey dunes; N - Humid dunes
Slieve Tooley/Tormore Island/Loughros Beg Bay SAC IE000190	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; Embryonic White dunes [2110]; White dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Decalcified fixed dunes with <i>Empetrum nigrum</i> [2140]; Atlantic decalcified fixed dunes (<i>Calluno-Ulicetia</i>) [2150]; Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]; Humid dune slacks [2190]; Alpine and Boreal heaths [4060]; Blanket bogs (* if active bog) [7130]; <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) [1014]; Otter <i>Lutra lutra</i> [1355]; Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Vegetated sea cliffs; N - Atlantic salt meadows; N - Mediterranean salt meadows; N - Embryonic dunes; White dunes; N - Grey dunes; N - Decalcified dunes; N - Atlantic decalcified dunes; N - <i>Salix</i> dunes; N - Humid dunes; N - Alpine and Boreal heaths; N - Blanket bogs; N - Narrow-mouthed Whorl Snail; N - Otter; N - Grey seal
Saltee Islands SAC IE000707	Mudflats and sandflats not covered by seawater at low tide [1140]; Large shallow inlets and bays [1160]; Reefs [1170]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; Submerged or partially submerged sea caves [8330]; Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Mudflats and sandflats; N - Large shallow inlets and bays; N - Reefs; N - Vegetated sea cliffs; N - submerged sea caves; N - Grey seal
Murlough UK0016612	Harbour seal <i>Phoca vitulina</i> [1365]	No Source-Pathway-Receptor link.	N - Harbour seal
The Maidens UK0030384	Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Grey seal
Pembrokeshire Marine/ Sir Benfro Forol UK0013116	Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Grey seal

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
West of Ardara/Maas Road SAC IE000197	Harbour seal <i>Phoca vitulina</i> [1365]	Harbour seal - Harvesting within the foraging range of <i>Phoca vitulina</i> (Harbour seal) (up to 273km, Carter et al. 2022).	Y - Harbour seal
	Estuaries [1130]; Mudflats and sandflats not covered by seawater at low tide [1140]; Large shallow inlets and bays [1160]; Annual vegetation of drift lines [1210]; Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330]; Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]; Embryonic shifting dunes [2110]; Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]; Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]; Decalcified fixed dunes with <i>Empetrum nigrum</i> [2140]; Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) [2150]; Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]; Humid dune slacks [2190]; Machairs (* in Ireland) [21A0]; Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]; Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130]; Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]; European dry heaths [4030]; Alpine and Boreal heaths [4060]; <i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210]; <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]; Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) [6510]; Blanket bogs (* if active bog) [7130]; Depressions on peat substrates of the <i>Rhynchosporion</i> [7150]; Alkaline fens [7230]; <i>Vertigo geyeri</i> (Geyer's Whorl Snail) [1013]; <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]; <i>Euphydrias aurinia</i> (Marsh Fritillary) [1065]; <i>Salmo salar</i> (Salmon) [1106]; <i>Lutra lutra</i> (Otter) [1355]; <i>Petalophyllum ralfsii</i> (Petalwort) [1395]; <i>Najas flexilis</i> (Slender Naiad) [1833]	No Source-Pathway-Receptor link.	N - Estuaries; N - Mudflats and sandflats; N - Large shallow inlets and bays; N - Annual vegetation of drift lines; N - Atlantic salt meadows; N - Mediterranean salt meadows; N - Embryonic shifting dunes; N - White dunes; N - Grey dunes; N - Decalcified fixed dunes; N - Atlantic decalcified fixed dunes; N - <i>Salix</i> dunes; N - Humid dunes; N - Machairs; N - Oligotrophic waters; N - Oligotrophic to mesotrophic standing waters; N - Northern Atlantic wet heaths; N - European dry heaths; N - Alpine and Boreal heaths; N - <i>Juniperus communis</i> formations; N - Semi-natural dry grasslands; N - <i>Molinia</i> meadows; N - Lowland hay meadows; N - Blanket bogs; N - Depressions on peat; N - Alkaline fens; N - Geyer's Whorl Snail; N - Freshwater Pearl Mussel; N - Marsh Fritillary; N - Salmon; N - Otter; N - Petalwort; Slender Naiad

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Strangford Lough UK0016618	Harbour seal <i>Phoca vitulina</i> [1365]	No Source-Pathway-Receptor link.	N - Harbour seal
Cardigan Bay/ Bae Ceredigion UK0012712	Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Grey seal
Pen Llyn a'r Sarnau/ Llyn Peninsula and the Sarnau SAC UK0013117	Grey seal <i>Halichoerus grypus</i> [1364]	No Source-Pathway-Receptor link.	N - Grey seal
North Anglesey Marine / Gogledd Môn Forol UK0030398	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Bristol Channel Approaches / Dynesfeydd Môr Hafren UK0030396	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
North Channel UK0030399	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
West Wales Marine / Gorllewin Cymru Forol UK0030397	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Récifs et landes de la Hague FR2500084	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Anse de Vauville FR2502019	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Banc et récifs de Surtainville FR2502018	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Chausey FR2500079	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Baie du Mont Saint- Michel FR2500077	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Estuaire de la Rance FR5300061	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Baie de Lanceloux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard FR5300012	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Cap d'Erquy-Cap Fréhel FR5300011	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Baie de SaintBrieuc – Est FR5300066	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Tregor Goëlo Est FR5300010	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Côte de Granit rose-Sept- Iles FR5300009	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Nord Bretagne DH FR2502022	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Baie de Morlaix FR5300015	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Abers - Côte des legends FR5300017	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Ouessant-Molène FR5300018	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Côtes de Crozon FR5302006	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Chaussée de Sein FR5302007	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Récifs du talus du golfe de Gascogne FR5302016	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Récifs et landes de la Hague FR2500084	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise
Baie du Mont Saint Michel FR2510048	Harbour porpoise <i>Phocoena phocoena</i> [1351]	No Source-Pathway-Receptor link.	N - Harbour porpoise

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

Natura 2000 site	Qualifying Interest/ Special Conservation Interest	Source-Pathway-Receptor Connections rationale	Considered for screening Y/N
Inner Galway Bay SPA IE004031	Black-throated Diver (<i>Gavia arctica</i>) [A002]; Great Northern Diver (<i>Gavia immer</i>) [A003]; Cormorant (<i>Phalacrocorax carbo</i>) [A017]; Grey Heron (<i>Ardea cinerea</i>) [A028]; Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]; Wigeon (<i>Anas penelope</i>) [A050]; Teal (<i>Anas crecca</i>) [A052]; Red-breasted Merganser (<i>Mergus serrator</i>) [A069]; Ringed Plover (<i>Charadrius hiaticula</i>) [A137]; Golden Plover (<i>Pluvialis apricaria</i>) [A140]; Lapwing (<i>Vanellus vanellus</i>) [A142]; Dunlin (<i>Calidris alpina</i>) [A149]; Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]; Curlew (<i>Numenius arquata</i>) [A160]; Redshank (<i>Tringa totanus</i>) [A162]; Turnstone (<i>Arenaria interpres</i>) [A169]; Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]; Common Gull (<i>Larus canus</i>) [A182]; Sandwich Tern (<i>Sterna sandvicensis</i>) [A191]; Common Tern (<i>Sterna hirundo</i>) [A193]; Wetland and Waterbirds [A999]	Seaweed harvesting is planned within the range of this SCI, introducing the possibility of direct disturbance from manual harvesters, as well as from boat and rake operations. Additionally, the potential for indirect impacts to food sources has been identified. A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts.	Y - All species
Lough Mask SPA IE004062	Tufted Duck (<i>Aythya fuligula</i>) [A061]; Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]; Common Gull (<i>Larus canus</i>) [A182]; Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] ; Common Tern (<i>Sterna hirundo</i>) [A193]; Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395]; Wetland and Waterbirds [A999]	Seaweed harvesting is planned within the range of the pelagic bird species Lesser Black-backed Gull . A potential pathway for significant effects exists, necessitating mitigation measures to reduce these impacts.	Y - Lesser Black-backed Gull

Table 6 (cont'd) - Relevant Natura 2000 sites and SPR identification and Rationale

SITE CODE	SPECIAL AREA OF CONSERVATION (SAC)	DISTANCE TO THE NEAREST POINT
		OF MUL AREA (KM)
IE000268	Galway Bay Complex SAC	The MUL area is located within GALWAY BAY COMPLEX SAC
IE002111	Kilkieran Bay and Islands SAC	Located ~40 km west of Galway Bay at the nearest point to the MUL area
IE001482	Clew Bay Complex SAC	Located ~73 km north of Galway Bay at the nearest point to the MUL area
IE002158	Kenmare River SAC	Located ~149 km southwest of Galway Bay at the nearest point to the MUL area
IE000204	Lambay Island SAC	Located ~192 km northeast of Galway Bay at the nearest point to the MUL area
IE000622	Ballysadare Bay SAC	Located ~114 km northeast of Galway Bay at the nearest point to the MUL area
IE000627	Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	Located ~122 km northeast of Galway Bay at the nearest point to the MUL area
IE000133	Donegal Bay (Murvagh) SAC	Located ~164 km northeast of Galway Bay at the nearest point to the MUL area
IE000458	Killala Bay/Moy Estuary SAC	Located ~100 km north of Galway Bay at the nearest point to the MUL area
IE002283	Rutland Island and Sound SAC	Located ~195 km northeast of Galway Bay at the nearest point to the MUL area
IE000197	West of Ardara/Maas Road SAC	Located ~172 km northeast of Galway Bay at the nearest point to the MUL area
IE000090	Glengarriff Harbour and Woodland SAC	Located ~160 km south of Galway Bay at the nearest point to the MUL area
IE000781	Slaney River Valley SAC	Located ~185 km east of Galway Bay at the nearest point to the MUL area
IE000297	Lough Corrib SAC	Located 11km north of Galway Bay at the nearest point to the MUL area
IE004031	Inner Galway Bay SPA	The MUL area is located within Inner Galway Bay SPA
IE004062	Lough Mask SPA	Located ~38 km northwest of Galway Bay at the nearest point to the MUL area

Table 7 - List of Irish Special Areas of Conservation and Special Protection Areas within ZOI (Figure 14 & 15)

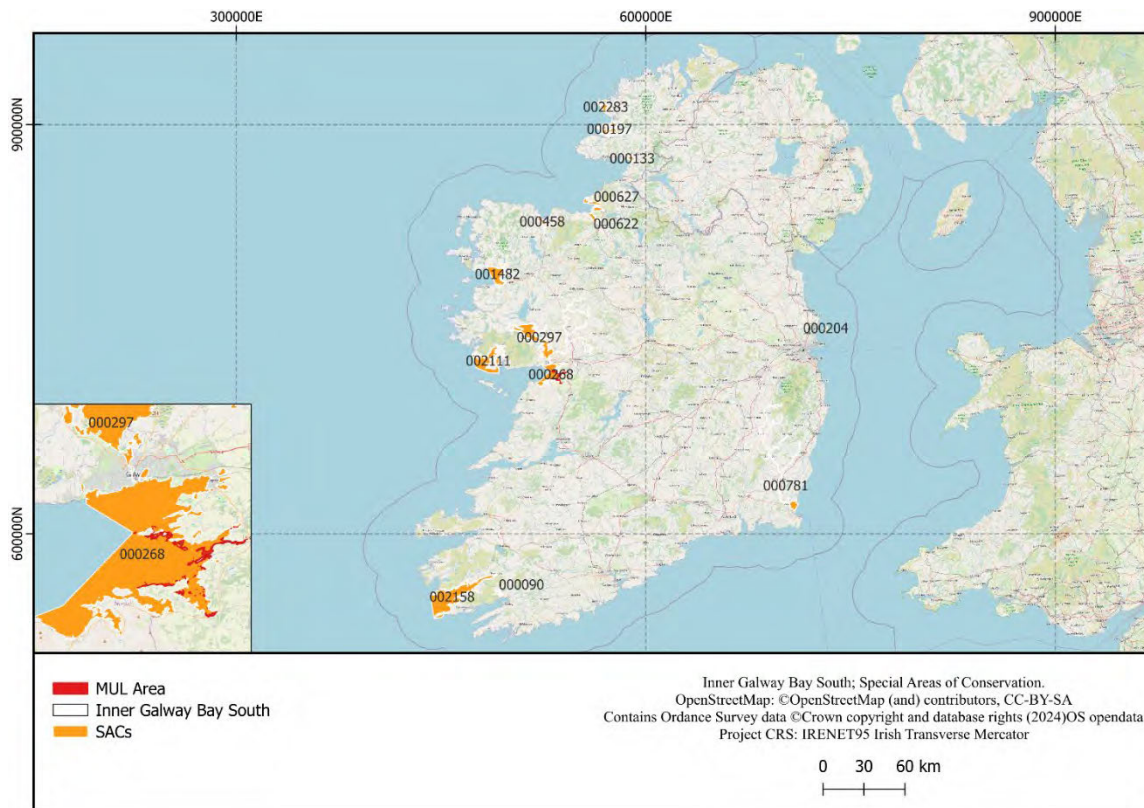


Figure 14 - Irish SACs within ZOI

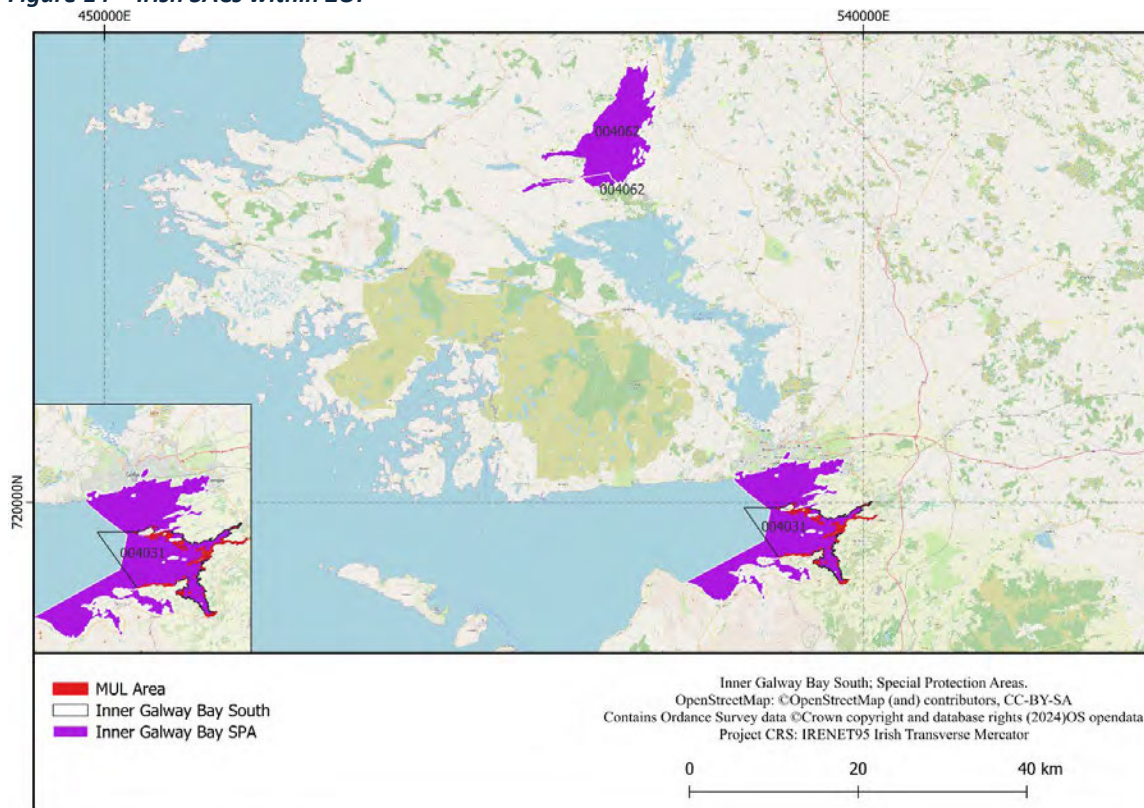


Figure 15 - Irish SPAs within ZOI

4.7 In-Combination Screening for Cumulative Effects

“Cumulative effects, the combined effect of more than one activity, may reinforce the impacts of a single activity due to temporal and/or spatial overlaps” (OSPAR, 2012)

Cumulative effects arise when multiple activities interact, potentially amplifying the ecological impact of individual undertakings through temporal and spatial overlaps (OSPAR, 2012). This principle underpins the importance of assessing in-combination effects in the context of sustainable seaweed harvesting alongside other planned or ongoing maritime initiatives within the Irish maritime area.

Only those projects planned within the marine environment have been considered in assessing in-combination effects due to other developments that may influence the Natura 2000 sites under discussion. Any land-based developments, such as residential, transport infrastructure, commercial establishments, wind energy installations, and similar projects that cannot influence the marine environment, are therefore excluded from in-combination effects assessments involving the proposed seaweed harvesting activities within the SACs and SPAs.

A thorough review of pertinent resources, including the Galway County Council database, the Maritime Area Regulatory Authority (MARA) website, the Department of Housing (DHLH), Local Government and Heritage’s Foreshore Licence Applications and Determinations, and the National Marine Planning Framework (NMPF) Activities Map, was conducted. Table 8 summarises foreshore applications classified as Completed, Determined, Submitted, or Under Consideration within proximity to Arramara Teo’s proposed MUL area. These projects include activities such as aquaculture, site investigations, buoy deployment and marine infrastructure developments.

Given the relatively small scale of Arramara Teo’s proposed seaweed harvesting operation and its spatial separation from the identified projects, the potential for in-combination effects is minimal. Furthermore, the dynamic nature of marine ecosystems and the spatially explicit nature of maritime activities reduce the likelihood of synergistic impacts, even in the absence of mitigation measures.

Based on the analysis, no significant in-combination effects are anticipated between the proposed seaweed harvesting project and other regional maritime activities. However, ongoing monitoring and adaptive management strategies should be employed to address any unforeseen interactions, aligning with the precautionary principle and obligations under the Habitats Directive (92/43/EEC).



Reference	County	Applicant	Title	Date Received	Location	Type of work	Activity	Status	Distances	Effects
MUL240038	Galway	MARUM	MUL240038 – MARUM – Center for Marine Environmental Sciences (University of Bremen)	2024	The Irish economic exclusive zone, West of Galway	Survey	Multidisciplinary marine investigations	Applied	128.83 km	No effects
MUL230024	Galway	Deep Sea Fibre Networks Ltd.	MUL230024- Deep Sea Fibre Networks Ltd.	2024	Galway / South West of Ireland	Survey	Marine Survey and Site Investigations for a cable route	Applied	Overlapping with the MUL Area	May have effects
FS007016	Galway	Deep Sea Fibre Networks	Deep Sea Fibre Networks Ltd	2022	Ballyloughane Strand, Renmore, Co Galway	Survey	Cable route survey and site investigations	Determination	Overlapping with the MUL Area	May have effects
FS007543	Galway	Fuinneamh Sceirde Teoranta	Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm (Export Cable Corridor)	2022	Off County Galway	Survey	site investigation activities	Determination	47.60 km	No effects
FS007161	Galway	Fuinneamh Sceirde Teoranta	Fuinneamh Sceirde Teoranta - Site Investigations for the proposed Sceirde Rocks Offshore Wind Farm	2022	Off County Galway	Survey	site investigation activitie	Determination	Overlapping with the MUL Area	May have effects
FS007461	Galway	University College Dublin	UCD Research Experiments, Inishmaan	2022	Inishmaan, Co. Galway	Buoys	short term deployment of buoys	Determination	20.18 km	No effects
FS007100	Galway	Health Service Executive	Health Service Executive Deployment of 6 Swim Buoys along Salthill Promenade	2021	Salthill Promenade, County Galway	Buoys	Buoy deployment	Consultation	Overlapping with the MUL Area	May have effects
FS007246	Galway	Farice ehf	Main lay and construction works for installation of the IRIS sub-sea fibre optic cable system, Co Galway	2021	from a landfall in Galway to a landfall in Iceland	Construction	Main lay and construction works	Determination	Overlapping with the MUL Area	May have effects
FS007495	Galway	Atlantic Offshore Renewable Energy 2	Atlantic Offshore Renewable Energy 2 – Site Investigations for proposed offshore wind farm, off County Galway	2021	Off County Galway	Survey	Site investigation survey	Withdrawn	Overlapping with the MUL Area	May have effects
LIC230008	Clare	Electricity Supply Board	LIC230008 – Electricity Supply Board	2023	Moneypoint	Survey	Site Investigations	Determined	60.54 km	No effects

Table 8 – Summary of Foreshore Applications



Reference	County	Applicant	Title	Date Received	Location	Type of work	Activity	Status	Distances	Effects
LIC230014	Limerick	Shannon Foynes Port Company	LIC230014 – Shannon Foynes Port Company	2024	Foynes Island	Site Investigation	A Marine Site Investigation to support the preliminary and detailed engineering design of the Deep-Water Terminal Development on Foynes Island.	Determined	54.91 km	No effects
LIC230004	Limerick	Aughinish Alumina Ltd	LIC230004 – Aughinish Alumina Ltd	2023	Shannon Estuary	Site works	Maintenance dredging	Consultation	53.11 km	No effects
MUL240034	Limerick	Gas Networks Ireland	MUL240034 – Gas Networks Ireland, Shannon Estuary	2024	Shannon Estuary	Survey	Survey works and deployment of monitoring devices	Applied	57.80 km	No effects
MUL240033	Galway / Clare	Uisce Éireann	MUL240033 – Uisce Éireann	2024	Galway Bay and Co Clare Coastal Area	Survey	Surveys	Applied	Covers the MUL Area	May have effects
MUL230024	Galway	Deep Sea Fibre Networks Ltd.	MUL230024- Deep Sea Fibre Networks Ltd.	2024	Galway / South West of Ireland	Survey	Marine Survey and Site Investigations for a cable route	Applied	Overlapping with the MUL Area	May have effects
T06-284	Kerry	Brandon Bay Seafoods (Ireland) Ltd	Brandon Bay Seafoods (Ireland) Ltd Aquaculture Licence Application and Review The Ponds, Kilshannig, Castlegregory, Co. Kerry	2024	Kilshannig, Castlegregory, Co. Kerry	Aquaculture	To cultivate Abalone, Sea Urchins, Molluscan Bivalves, Crustaceans, Macro and Micro Algae, Common Eelgrass and Dwarf Eelgrass	Application Accepted	106.49 km	No effects
T26/017	Tipperary	ESB Fisheries Conservation	Public Consultation on an Aquaculture Licence Application	2024	Parteen, Birdhill, Co. Tipperary	Aquaculture	To cultivate Salmon	Consultation	53.04 km	No effects
T26/017	Tipperary	ESB Fisheries Conservation	ESB Fisheries Conservation Aquaculture Licence Application to cultivate Salmon in Parteen, Birdhill, Co. Tipperary	2024	Parteen, Birdhill, Co. Tipperary	Aquaculture	To cultivate Salmon	Consultation	53.04 km	No effects

Table 8 (cont'd) – Summary of Foreshore Applications



Reference	County	Applicant	Title	Date Received	Location	Type of work	Activity	Status	Distances	Effects
T08-115A	Clare	Sliogeisc Siar Teoranta	Sliogeisc Siar Teoranta Foreshore Licence Application, Aughinish Bay, South Galway Bay, Co. Clare	2024	Aughinish Bay, South Galway Bay in Co. Clare.	Aquaculture	To cultivate Pacific and Native Oysters / Aquaculture activities	Consultation	Overlapping with the MUL Area	May have effects
T06/233	Kerry	Cromane Seafoods Ltd	Determination of Aquaculture/Foreshore Licencing Application (Renewal)	2025	Ballylongford Bay, Shannon Estuary, Co. Kerry	Aquaculture	To cultivate Mussels	Renewal	63.64 km	No effects
T08/111A	Clare	Eamon Chesser	Determination of Aquaculture/Foreshore Licensing Application	2020	Poul-na-clough Bay, Co. Clare	Aquaculture	To cultivate Mussels	Determination	Overlaps with the MUL Area	May have effects
T08/112A	Clare	Eamon Chesser	Determination of Aquaculture/Foreshore Licensing Application	2020	Poul-na-clough Bay, Co. Clare	Aquaculture	To cultivate Mussels	Determination	Overlaps with the MUL Area	May have effects
T08/114A	Clare	Cartron Point Shellfish Ltd	Determination of Aquaculture/Foreshore Licensing Application	2020	Poul-na-clough Bay, Co. Clare.	Aquaculture	To cultivate Seaweeds	Determination	Overlaps with the MUL Area	May have effects
T08/115A	Clare	Sliogeisc Siar Teoranta	Determination of Aquaculture/Foreshore Licensing Application	2020	Aughinish Peninsula, Co. Clare.	Aquaculture	To cultivate Pacific and Native Oysters / Aquaculture activities	Determination (unsuccessful)	Overlaps with the MUL Area	May have effects
T09/375A	Galway	De Burca Oysters Limited	Determination to Revoke Aquaculture Licence	2024	Mweelon Bay, Co. Galway	Aquaculture	-	Revoked	Overlaps with the MUL Area	No effects
T09-375C	Galway	De Burca Oysters Limited	Determination to Revoke Aquaculture Licence	2024	Mweelon Bay, Co. Galway	Aquaculture	-	Revoked	Overlaps with the MUL Area	No effects
T09/520	Galway	Galway Gourmet Oysters Ltd	Determination of Aquaculture Foreshore Licensing application	2020	Mweeloon Bay, Co. Galway	Aquaculture	To cultivate Pacific Oysters	Determination	Overlaps with the MUL Area	May have effects
T09/519	Galway	Galway Gourmet Oysters Ltd	Determination of Aquaculture Foreshore Licensing application	2020	Aughinish Bay, Co. Galway.	Aquaculture	To cultivate Pacific Oysters	Determination	Overlaps with the MUL Area	May have effects
T09/512	Galway	Dara Vaughan	Determination of Aquaculture Foreshore Licensing application	2020	South Galway Bay, Co. Galway	Aquaculture	To cultivate King Scallops	-	Overlaps with the MUL Area	May have effects

Table 8 (cont'd) – Summary of Foreshore Applications



Reference	County	Applicant	Title	Date Received	Location	Type of work	Activity	Status	Distances	Effects
T09/504	Galway	Michael Irwin	Determination of Aquaculture Foreshore Licensing application	2020	Mweeloon Bay, Co. Galway	Aquaculture	To cultivate Pacific Oysters	-	Overlaps with the MUL Area	May have effects
T09/503	Galway	Galway Gourmet Oysters	Determination of Aquaculture Foreshore Licensing application	2020	Inishcorra Bay, Co. Galway	Aquaculture	To cultivate Pacific Oysters	Determination	Overlaps with the MUL Area	May have effects
T09/501	Galway	Thomas Connolly	Determination of Aquaculture Foreshore Licensing application	2020	South Galway Bay, Co. Galway	Aquaculture	To cultivate Pacific Oysters	Determination	Overlaps with the MUL Area	May have effects
T09/500	Galway	Thomas Connolly	Determination of Aquaculture Foreshore Licensing application	2020	Kinvara Bay Co. Galway	Aquaculture	To cultivate Pacific Oysters	Determination	Overlaps with the MUL Area	May have effects
T09/499	Galway	PJ Martyn	Determination of Aquaculture Foreshore Licensing application	2020	Kinvarra Bay, Co. Galway	Aquaculture	To cultivate Pacific Oysters	Determination (unsuccessful)	Overlaps with the MUL Area	May have effects

Table 8 (cont'd) – Summary of Foreshore Applications



In-Combination Screening for Cumulative Effects

Maritime developments have been identified and are listed in Table 8. This project's cumulative effects spatial scope (CESS) includes only those maritime developments that overlap with the proposed MUL. Of the maritime plans and projects in development, 15 were within the CESS.

- Deep Sea Fibre Networks Ltd.
- Fuinneamh Sceirde Teoranta
- Health Service Executive
- Farice ehf
- Atlantic Offshore Renewable Energy 2
- Uisce Éireann
- Sliogeisc Siar Teoranta
- Eamon Chesser
- Cartron Point Shellfish Ltd
- Sliogeisc Siar Teoranta
- Galway Gourmet Oysters Ltd
- Dara Vaughan
- Michael Irwin
- Thomas Connolly
- PJ Martyn

Arramara Teo's Resource Managers also engaged with local stakeholders (fishers, farmers, harvesters) regarding any potential upcoming plans or projects in the maritime area near the proposed MUL. Their investigations found that no further plans or projects were in place. Exact location data for some maritime developments was unavailable, so a central reference point (centroid) was used instead.

In-Combination Effects Determination

After a thorough assessment, it has been concluded that the probability of substantial impacts on the conservation objectives of Natura 2000 sites, combined with other regional plans and developments, cannot be reliably dismissed. Therefore, they are screened in for Stage 2 Appropriate Assessment and will be considered further in the Natura Impact Statement.

4.8 Potential Significant Impacts

Removal of Target Species

The sustainable harvesting of *Ascophyllum* (limited to 20% removal, below the species' annual growth rate) ensures biomass recovery within one year, maintaining habitat functionality and ecological balance. This approach leaves sufficient biomass to support associated flora and fauna while allowing natural regrowth and replenishing the habitat. Notably, no overlap exists between the MUL area and Annex I habitats, ensuring no significant impact on the intertidal rocky shores within Galway Bay Complex SAC.

Consequently, removing *Ascophyllum* and *Fucus* will not negatively affect the rocky intertidal habitats or the broader ecological integrity of Galway Bay Complex SAC.

Up to 1,510 tonnes per annum of *Ascophyllum* and *Fucus* will be removed from the intertidal shoreline in the MUL area (see Table 2). The harvest percentage of seaweed per site, along with the method of site management through rotation, have been planned to ensure that a limited amount of biomass is

removed from any one area, or indeed from the sites in combination, and to ensure that the seaweed harvesting in Galway Bay Complex SAC remains sustainable.

Seaweed harvesting is unlikely to significantly impact the ecological function of the bay due to the removal of target species; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Removal of Non-Target Species

The removal of target seaweeds may also involve non-target species, such as epiphytic flora like *Vertebrata lanosa* and fauna like *Littorina obtusata* and *L. littorea*, which contribute to the intertidal rocky shore community. Although not Qualifying Interests, these associated species play a role in the habitat's ecological balance.

Some snails, such as *Littorina spp.*, typically detach during harvesting, but an unknown proportion may remain attached and be removed. Invertebrates attached to rocks beneath the seaweed may also be affected. Research from North America indicates that while some non-target species are removed during harvesting, many remain in the area. Studies from Philippi et al. 2014; Fegley, 2001; Trott and Larsen, 2012; Mittelstaedt, 2023; Sharp et al 1997; Hamilton 1997; show that harvesting *Ascophyllum* has minimal to no long-term impact on associated fauna. Due to conservative exploitation rates, most biomass within the MUL area remains unharvested, preserving enough non-target species and preventing over-exploitation. Thus, the ecological function of intertidal rocky shores is maintained. The removal of *Ascophyllum* and *Fucus* biomass also impacts habitat availability for associated species like *Vertebrata lanosa* and *Littorina obtusata*. However, the impact of the harvest will most likely be insignificant. Studies done in Maine, USA, showed that the harvest of *Ascophyllum* only removed 0.3% of the snail population in a bay (Ugarte et al. 2010).

Seaweed harvesting is unlikely to significantly impact the ecological function of the bay due to the removal of non-target species; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Uncovering Previously Hidden Fauna

Harvesting of *Ascophyllum* and *Fucus* will reduce the cover and may uncover previously hidden invertebrates such as winkles *Littorina spp.*, whelk *Nucella spp.*, *Gibbula umbilicalis*, limpet *Patella vulgata* and shore crabs, thus increasing their availability as food items. Mobile fauna such as crabs will quickly move to alternative nearby refugia before predators such as otters approach, i.e. before the harvesters have left the area. Gastropods such as *Littorina spp.* and *Nucella spp.* However, it will remain stationary until the shore is inundated by the incoming tide which birds may predate on them.

Shorebirds associated with the Galway Bay SPA, including Ringed Plover, Dunlin, Bar-tailed Godwit, Curlew, Redshank, and Turnstone, feed extensively on intertidal invertebrates such as mussels, gastropods, polychaetes, and crustaceans (Zwarts et al. 1996, Gill & Piersma, 2006 Lourenço et al. 2016). The temporary exposure of invertebrates during harvesting may increase the foraging efficiency of these species. However, the rotational nature of harvesting ensures that sufficient biomass and cover remain in unharvested sections of the shore, providing adequate refugia for invertebrate populations and mitigating predation pressure. Consequently, any localised increases in bird foraging

success will not lead to significant impacts on intertidal invertebrate populations or habitat functionality.

Black-throated Diver and Great Northern Diver are deep divers that primarily forage in subtidal waters and do not rely on intertidal invertebrates for feeding (Polak & Ciach, 2007, Jardine, 2024). Similarly, the Red-breasted Merganser, Cormorant, and Grey Heron predominantly target fish and other aquatic prey in shallow or subtidal waters (Bur et al. 2008, Carrs, 2008, Lekuona, 2022). These species are unlikely to experience significant disturbance or changes to their foraging ecology because of intertidal harvesting activities.

Light-bellied Brent Goose grazes primarily on coastal salt marsh vegetation and seagrass (*Zostera spp.*) (Clausen, 2000), habitats distinctly separate from intertidal rocky shores where harvesting occurs. Its feeding and roosting behaviours are therefore unaffected by the proposed activities.

Waterfowl species, including Wigeon and Teal, typically forage in estuarine and wetland habitats on vegetation and aquatic invertebrates (Guillemain, et al. 2002). Their ecological reliance on intertidal rocky habitats is minimal, and they are unlikely to be impacted by harvesting operations. Similarly, Golden Plover and Lapwing predominantly utilise inland grasslands and wetlands (Mason & Macdonald, 1999), reducing their likelihood of interaction with the intertidal zone.

Gull species, such as Black-headed Gull and Common Gull, are opportunistic feeders that may scavenge or forage in intertidal habitats but are highly mobile and can easily relocate to undisturbed areas (Schwemmer et al. 2008). Similarly, Sandwich Tern and Common Tern are plunge-divers that feed primarily in nearshore waters on small fish and are not dependent on intertidal invertebrates for sustenance (Dunn, 1972, Morten et al. 2022). Their nesting sites, located on islands or sandbanks above the high-water mark, are spatially and temporally separated from harvesting areas.

Overall, while the temporary uncovering of intertidal invertebrates during seaweed harvesting may enhance the feeding opportunities for certain shorebirds and waders, sufficient biomass will remain in unharvested areas to sustain the ecological function of intertidal habitats.

Seaweed harvesting is unlikely to significantly impact the ecological function of the bays due to uncovering previously hidden fauna; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Desiccation of Sediment

Due to the rocky substrata present, seaweed harvesting is unlikely to significantly impact the ecological function of Inner Galway Bay South due to the desiccation of sediment; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Trampling of Flora and Fauna during the weed-cutting process and collection

Traditional hand harvesters will walk on the shore to cut the seaweed, and some trampling will occur. However, the pressure exerted by one or two people walking on the shoreline will be low. The effect of this pressure, particularly on hard substrates such as rocky shores where the target species grow, will also be low. Also, an area will only be harvested rotationally and then be allowed to regrow

depending on the bay. Hence, the intervals at which the trampling will occur will be infrequent. Therefore, trampling by traditional hand harvesters may directly impact the shorelines on which harvesting occurs but is unlikely to affect rocky intertidal shorelines negatively.

Seaweed will be transported by boat to shore access locations, where the "climíní" will be off-loaded for subsequent collection by tractor and trailer. The tractor and trailers will access the area via existing roads and remain off the shore; therefore, they will not significantly impact the area. No trampling will occur from using the boat and rake harvest method.

Seaweed harvesting is unlikely to significantly impact the ecological function of the bays due to trampling of flora and fauna during the weed-cutting process and collection; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Trampling Due to Access

Access to sites is shown in Figure 5 of this document and avoid areas of the following habitats: Coastal lagoons [1150]; Perennial vegetation of stony banks [1220]; Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]; *Salicornia* and other annuals colonising mud and sand [1310]; Turloughs [3180]; Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330]; Mediterranean salt meadows (*Juncetalia maritimi*) [1410]; Turloughs [3180]; *Juniperus communis* formations on heaths or calcareous grasslands [5130]; Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites) [6210]; Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae* [7210]; Alkaline fens [7230] and Limestone pavements [8240].

Mudflats and sandflats not covered by seawater at low tide (1140) are found below the intertidal area and are not traversed by harvesters en route to areas where the target seaweed species grow.

Seaweed harvesting is unlikely to significantly impact the ecological function of the bay due to trampling due to access; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Trampling by Arramara Teo Personnel

The sampling and monitoring activities by Arramara Teo personnel involve walking on the shoreline to measure seaweed biomass. While this necessitates some trampling, the associated impact is minimal for several reasons. First, the pressure exerted by one or two individuals walking on rocky intertidal substrates, where *Ascophyllum* grows, is inherently low. These substrates are composed of hard rock and boulders, which are resistant to physical damage from human footfall. Moreover, the rotational nature of sampling ensures that any given area is revisited only after sufficient intervals, allowing the habitat to recover fully between sampling efforts.

Seaweed sampling by Arramara Teo personnel is unlikely to impact the ecological function of the bay significantly; a potential pathway for impacts has not been identified, and mitigation measures are not required.



Potential Pollution from Boats

Due to Arramara Teo's stringent operational protocols and adherence to international and national regulations, the potential for pollution from boats involved in seaweed harvesting activities is minimal. Vessels operated by Arramara Teo are small (20-30 HP outboard motors) and certified by the Maritime Safety Office, ensuring compliance with environmental safety standards. These boats use low-emission, modern engines designed to minimise the release of pollutants into the marine environment.

Refuelling operations are conducted off-site, eliminating the risk of accidental fuel spills near the harvesting areas. In addition, harvesting boats carry minimal fuel reserves during operations, further reducing the likelihood of significant contamination in the event of an incident. Standard Operating Procedures for spill response are strictly enforced.

Potential pollution from boats is unlikely to impact the ecological function of the bay significantly; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Increased Turbidity

Due to the low-impact nature of the activities and the specific characteristics of the harvesting methods, the sustainable harvesting of *Ascophyllum* and *Fucus* is not expected to increase turbidity in the marine environment significantly.

Increased turbidity from boats is unlikely to impact the ecological function of the bay significantly; a potential pathway for impacts has not been identified, and mitigation measures are not required.

Disturbance of Fauna by Harvest Activities

Waders and Shorebirds of Inner Galway Bay SPA:

Sandwich Tern, Common Tern, Black-headed Gull, and Common Gull are shallow-diving or opportunistic species that primarily forage on small fish and invertebrates in nearshore or coastal waters. These species feed during periods when intertidal areas are submerged, typically between half-high and half-low tide, and do not rely directly on exposed intertidal zones targeted for seaweed harvesting. Both tern species nest colonially above the high-water mark, primarily on shingle spits, sandbanks, or islands, ensuring that their breeding colonies are spatially separated from harvesting activities. Black-headed Gulls and Common Gulls, which are highly mobile and opportunistic feeders, are unlikely to experience significant disturbance due to the transient and localised nature of harvesting.

Great Northern Diver, Black-throated Diver, Red-breasted Merganser, and Cormorant are deep-diving species that primarily forage on fish in nearshore and offshore waters. These species do not utilise the exposed intertidal zone for feeding, and their activities will not overlap with the seaweed harvesting operations. Cormorants and Red-breasted Mergansers nest in areas away from the intertidal zone, such as inland water bodies or coastal cliffs, while the breeding grounds of the two diver species are in freshwater habitats outside the MUL area. As a result, there is no potential for disturbance to their feeding or nesting behaviours.

Light-bellied Brent Goose, Wigeon, and Teal are dabbling species that forage in shallow waters, salt marshes, and coastal grasslands rather than rocky intertidal zones. These habitats are distinctly separate from the targeted harvesting areas, and no significant disturbance to their foraging or roosting behaviours is anticipated. Similarly, Grey Heron, which typically forages in estuarine habitats and shallow coastal waters, is unlikely to be affected by the harvesting activities due to the spatial separation of its primary feeding grounds.

Wading species associated with the Inner Galway Bay SPA, including Ringed Plover, Golden Plover, Lapwing, Dunlin, Bar-tailed Godwit, Curlew, Redshank, and Turnstone, forage on intertidal invertebrates. These birds may experience minor localised disturbances from harvesters on the shoreline. However, such disturbances will be highly localised, limited to small areas of the shore, and infrequent. Foraging birds in proximity to the harvesting activity may temporarily move to adjacent undisturbed areas. The overall level of disturbance is expected to be low and transient.

Most of the breeding sites for the aforementioned species are situated in habitats distinct from rocky intertidal areas. For example:

- Ringed Plover nests on sandy or shingle beaches above the high-water mark, often in scrapes on open ground (BirdWatch Ireland, 2025a).
- Lapwing and Golden Plover breed inland, favouring grasslands and moorlands (BirdWatch Ireland, 2025b, 2025c).
- Curlew nests in coastal wetlands, bogs, and grasslands, typically far from intertidal zones (BirdWatch Ireland, 2025d).
- Dunlin nests in coastal wetlands and machair habitats (BirdWatch Ireland, 2025e).
- Black-throated Diver and Great Northern Diver: These species typically breed in freshwater habitats far inland, such as lochs and lakes, well beyond the reach of intertidal harvesting activities (BirdWatch Ireland, 2025f, 2025g).
- Cormorant: Cormorants primarily nest in colonies on cliffs, trees, or artificial structures, which are well separated from intertidal zones (BirdWatch Ireland, 2025h).
- Grey Heron: This species nests in colonies, often in tall trees near freshwater or estuarine habitats, far from the rocky intertidal areas targeted for harvesting (BirdWatch Ireland, 2025i).
- Light-bellied Brent Goose: Brent geese do not breed in Ireland; they are winter migrants that breed in Arctic tundra habitats (BirdWatch Ireland, 2025j).
- Wigeon and Teal: These dabbling ducks typically breed in inland wetland habitats, such as marshes and lakes, far from the intertidal zones where seaweed harvesting occurs (BirdWatch Ireland, 2025k, 2025l).
- Bar-tailed Godwit, Redshank, and Turnstone: These waders primarily breed in Arctic or sub-Arctic regions and are present in Ireland only as non-breeding overwintering populations (BirdWatch Ireland, 2025m, 2025n, 2025o).

- Golden Plover: Though included earlier, its breeding habitats are typically upland moors and grasslands rather than intertidal areas, so disturbance to its breeding is less relevant to intertidal activities (BirdWatch Ireland, 2025p).
- Black-headed Gull, Common Gull, Sandwich Tern, and Common Tern: These species primarily breed in colonies on coastal islands, sandbanks, or above the high-water mark. While relevant, their nesting habitats are well outside the intertidal areas affected by seaweed harvesting (BirdWatch Ireland, 2025q, 2025r, 2025s, 2025t).

Given the distinct separation between their breeding habitats and the rocky intertidal areas where harvesting occurs, there will be no significant impact on the nesting or reproductive success of these species.

None of the bird's nest in the intertidal area where harvesting will occur, and the variety of habitats they use, along with their distance from the intertidal area, ensure that disturbance to breeding birds will be insignificant. Nevertheless, although seaweed harvesting is unlikely to significantly impact bird species in the Galway Bay SPA, a potential pathway for impacts has been identified, and mitigation measures are required.

Potential impacts from physical disturbance from harvesters, impacts to water quality and food sources have been identified, leading to mitigation requirements. Mitigation cannot be provided in a Screening for Appropriate Assessment report.

Migratory Birds:

Common Tern (*Sterna hirundo*), Cormorants (*Phalacrocorax carbo*), Lesser Black-backed Gulls (*Larus fuscus*), and Sandwich Terns (*Thalasseus sandvicensis*) are migratory bird species that utilise coastal and intertidal habitats, and their foraging ranges may overlap with the proposed MUL. These species exhibit varying degrees of reliance on the intertidal zone for feeding, with some primarily foraging in nearshore waters or deeper marine areas. The potential for disturbance to these birds arises mainly from the presence of harvesters on the shore and the associated activities of Arramara Teo harvesting boats.

Sandwich Terns and Common Tern are plunge divers that forage on small fish and invertebrates, typically in nearshore waters rather than directly on the intertidal (Dunn, 1972, Morten et al. 2022).

Cormorants and Lesser Black-backed Gulls are more commonly associated with nearshore and offshore foraging habitats, relying on fish rather than intertidal resources (Camphuysen & Garthe, 2000, Gremillet et al. 2003). Their presence in the intertidal zone is infrequent, and any disturbance caused by harvesting activities would likely result in temporary displacement without significant disruption to their feeding ecology.

During the breeding season, Common Terns and Sandwich Terns nest colonially on coastal islands, sandbanks, or shingle spits above the high-water mark (BirdWatch Ireland, 2025s, 2025t), well outside the intertidal zone. Similarly, Lesser Black-backed Gulls nest in a variety of habitats, including coastal cliffs, dunes, and offshore islands (BirdWatch Ireland, 2025u), none of which overlap with the intertidal areas targeted for seaweed harvesting. Cormorants, which are both cliff-nesting birds (BirdWatch Ireland, 2025h), are similarly unaffected by intertidal harvesting activities. As these

species' breeding habitats are separated from the harvesting zones, no significant impact on breeding success, colony stability, or population dynamics is anticipated.

While migratory birds foraging in the intertidal zone may experience localised and temporary disturbance due to harvester presence, this disturbance is expected to be minimal. Harvesting activities are rotational and infrequent, affecting small, discrete sections of the shoreline at any given time. Birds disturbed by human activity typically move to nearby undisturbed areas, mitigating the likelihood of prolonged disruption.

Although seaweed harvesting is unlikely to significantly impact migratory bird species which overlap the MUL area, a potential pathway for impacts has been identified, and mitigation measures are required.

Potential impacts from physical disturbance from harvester, impacts to water quality and food sources have been identified, leading to mitigation requirements. Mitigation cannot be provided in a Screening for Appropriate Assessment report.

Marine Mammals:

The Common bottlenose dolphin (*Tursiops truncatus*), Otter (*Lutra lutra*), Harbour porpoise (*Phocoena phocoena*), Common seal (*Phoca vitulina*), and Grey seal (*Halichoerus grypus*) are marine mammals regularly observed in Irish waters. While these species are highly mobile and display diverse habitat usage patterns, their potential interaction with seaweed harvesting activities is a critical consideration of Arramara Teo in ensuring the sustainability of these operations.

Marine mammals frequent the coastal and nearshore waters of the west of Ireland, where they engage in activities such as foraging, socialising, and resting. Common bottlenose dolphins exhibit a broad range of habitat preferences, from shallow bays to offshore waters (Ingram & Rogan, 2002). While they may enter bays within the MUL area, their primary foraging habitats are deeper waters where fish schools aggregate. Harbour porpoises are primarily found in shallow waters but typically forage in areas with strong tidal currents (Embling et al. 2010), where prey species are abundant. They are not dependent on intertidal zones targeted for seaweed harvesting. Common and Grey seals haul out on beaches, sandbanks, and rocky outcrops for resting, moulting, and breeding (Marine Scotland, 2014). While their haul-out sites may occasionally be near harvesting areas, seals predominantly forage in the water column rather than the intertidal habitat. Otters primarily forage in the intertidal and shallow subtidal zones, preying on fish, crabs, and other marine invertebrates (Coletti, 2021). They often use coastal rock crevices, vegetation, or holts near water as resting or denning sites. Unlike many other marine mammals, otters are closely associated with intertidal habitats, meaning their activities could potentially overlap with seaweed harvesting areas. Ensuring that harvesting practices minimise disturbance to these habitats is essential for the continued conservation of otter populations in the area.

The localised and intermittent nature of seaweed harvesting minimises its potential to disturb marine mammals significantly.

Although seaweed harvesting is unlikely to impact marine mammal species which overlap the MUL area significantly, a potential pathway for impacts has been identified, and mitigation measures are required.

Potential impacts from physical disturbance from harvesters, acoustic disturbance from boat motors and impacts to water quality have been identified, leading to mitigation requirements. Mitigation cannot be provided in a Screening for Appropriate Assessment report.

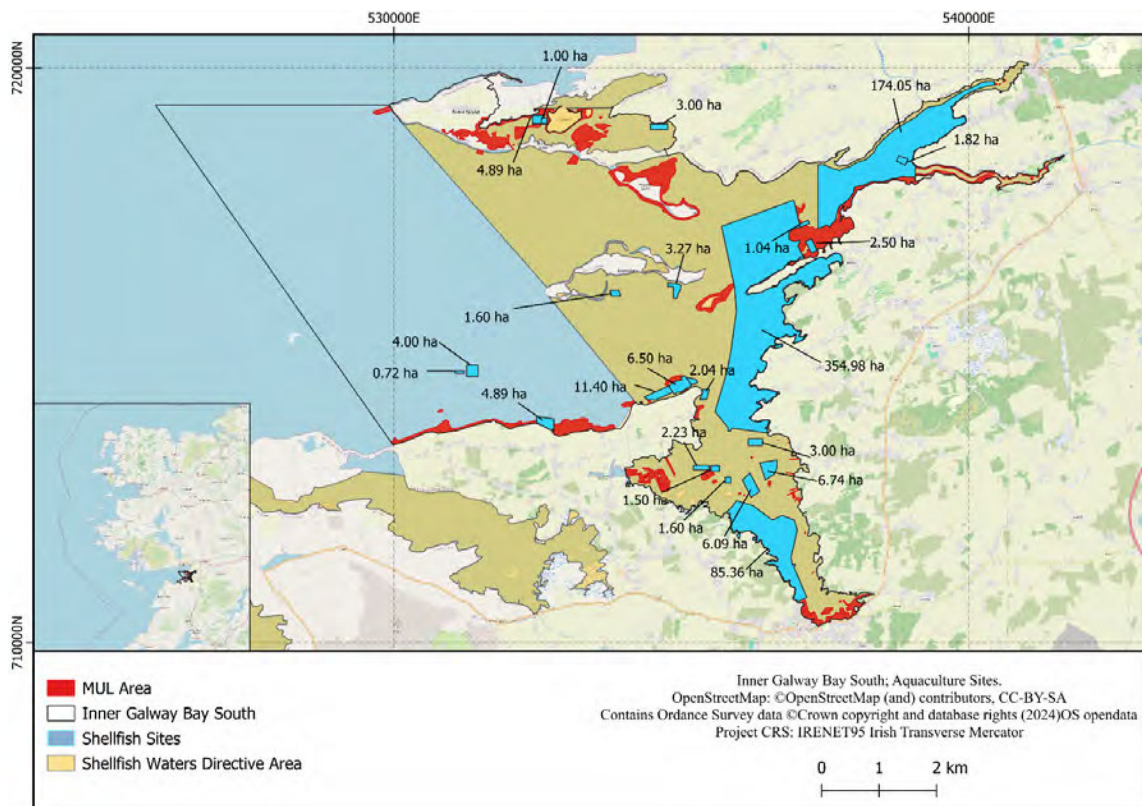


Figure 16 – Aquaculture sites in the vicinity of Inner Galway Bay South

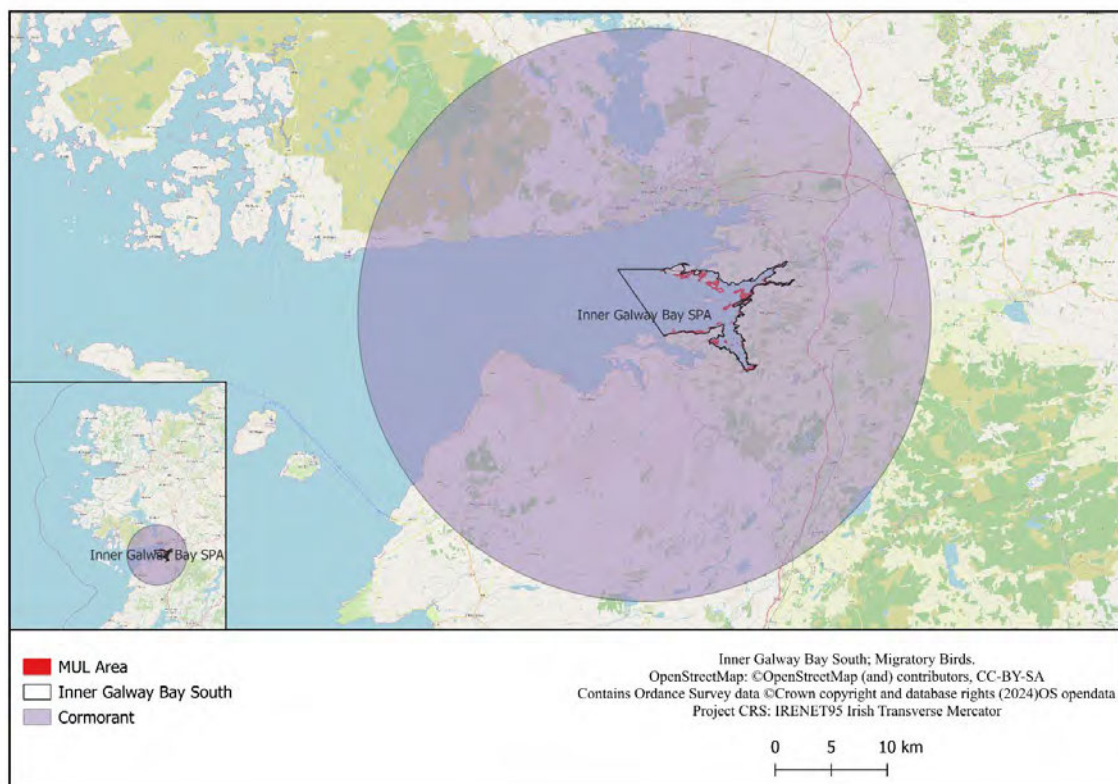


Figure 17 – Cormorant; Inner Galway Bay South

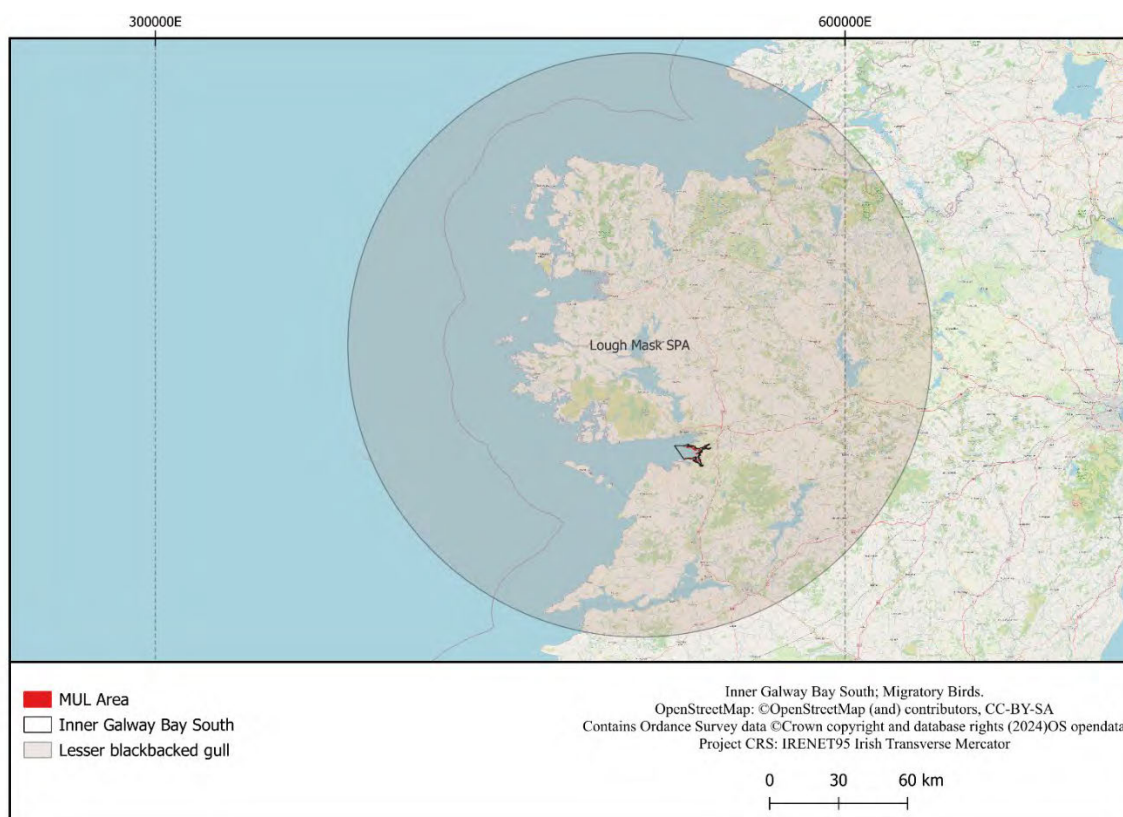


Figure 18 – Lesser Black-Backed Gull; Inner Galway Bay South

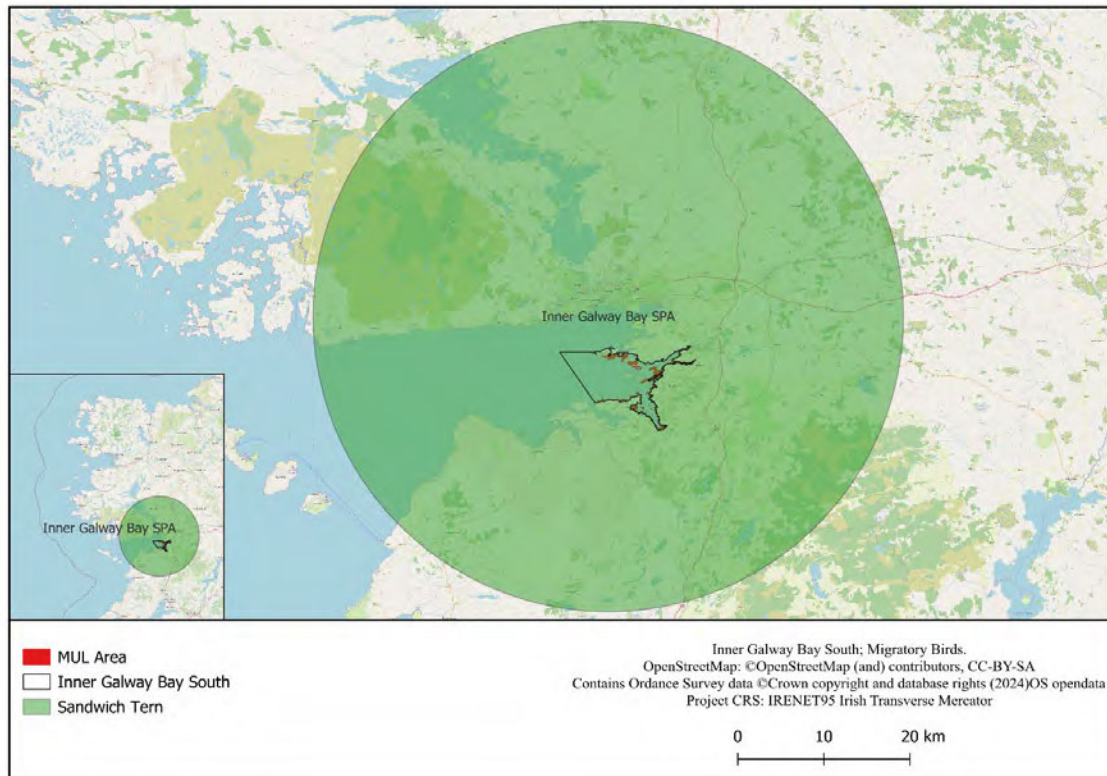


Figure 19 – Sandwich Tern; Inner Galway Bay South

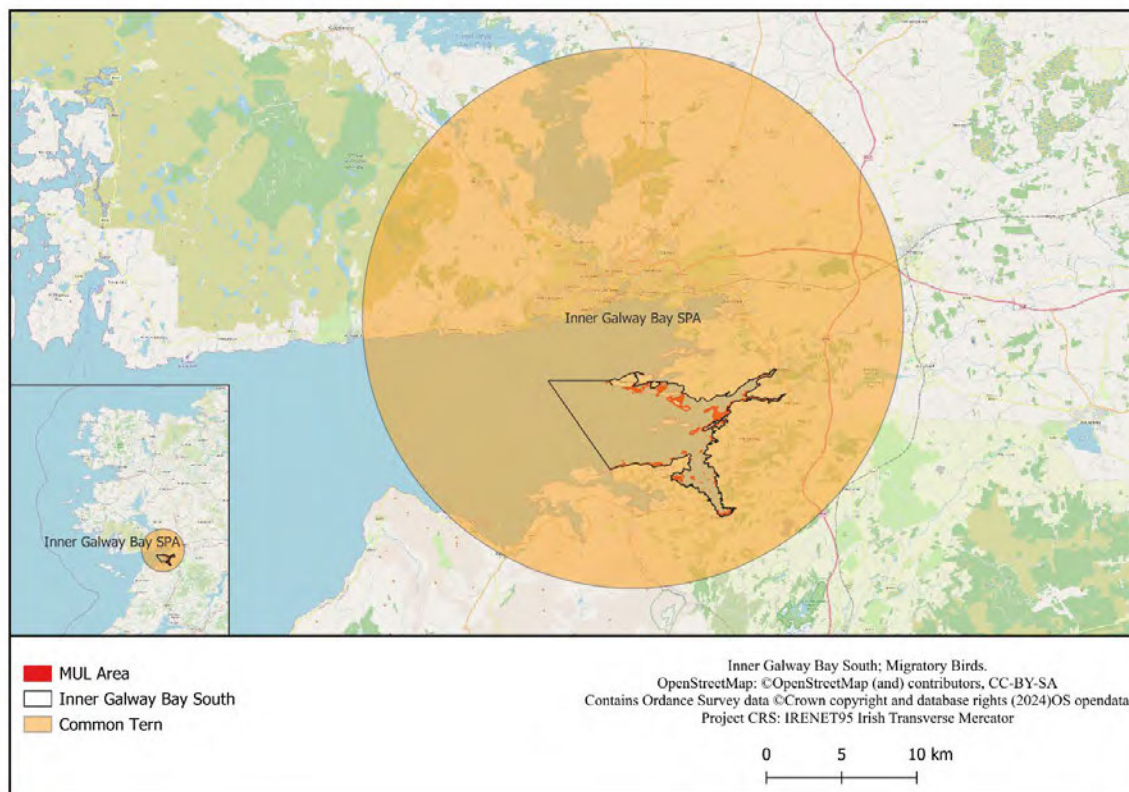


Figure 20 - Common Tern; Inner Galway Bay South

Table 9 below summarises the requirement of mitigation measures for the MUL area.

	Mitigation measures required	No mitigation measures required
Removal of target species		x
Removal of non-target species		x
Uncovering previously hidden fauna		x
Desiccation of sediment		x
Trampling of flora and fauna during the weed-cutting process and collection		x
Trampling due to access		x
Trampling by Arramara Teo personnel		x
Potential pollution from boats		x
Increased turbidity		x
Disturbance of fauna by harvest activities	x	

Table 9 - Summary Table

4.9 Screening Determination Statement

Following careful and thorough examination of all potentially relevant SACs and SPAs within the ZOI, the following have been screened in for Stage 2 Appropriate Assessment.

Natura 2000 Sites	Habitat/Species	Potential Impact
Galway Bay Complex SAC IE000268	Mudflats and sandflats not covered by seawater at low tide [1140]	Physical disturbance from harvesters
Galway Bay Complex SAC IE000268	Large shallow inlets and bays [1160]	Physical disturbance from harvesters
Galway Bay Complex SAC IE000268	Reefs [1170]	Physical disturbance from harvesters
Galway Bay Complex SAC IE000268	Perennial vegetation of stony banks [1220]	Physical disturbance from harvesters
Galway Bay Complex SAC IE000268	Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]	Physical disturbance from harvesters
Galway Bay Complex SAC IE000268	Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]	Physical disturbance from harvesters
Lough Corrib SAC IE000297	Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]	Direct effects of accidental hydrocarbon pollution
Galway Bay Complex SAC IE000268 Lough Corrib SAC IE000297	Otter <i>Lutra lutra</i> [1355]	Physical disturbance from harvesters, acoustic disturbance from boat motors and impacts on water quality
Lough Corrib SAC IE000297	Salmo salar (Salmon) [1106]	Direct effects of accidental hydrocarbon pollution.
Glengarriff Harbour and Woodland SAC IE000090 Slaney River Valley SAC IE000781 Clew Bay Complex SAC IE001482 Kenmare River SAC IE002158 Lambay Island SAC IE000204 Kilkieran Bay and Islands SAC IE002111 Ballysadare Bay SAC IE000622 Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC IE000627 Donegal Bay (Murvagh) SAC IE000133 Killala Bay/Moy Estuary SAC IE000458 Rutland Island and Sound SAC IE002283 West of Ardara/Maas Road SAC IE000197	Common seal <i>Phoca vitulina</i> [1365]	Physical disturbance from harvesters, acoustic disturbance from boat motors and impacts on water quality

Table 10 – Habitat and species screened in for Stage 2 Appropriate Assessment

Natura 2000 Sites	Habitat/Species	Potential Impact
Inner Galway Bay SPA IE004031	Black-throated Diver (<i>Gavia arctica</i>) [A002]; Great Northern Diver (<i>Gavia immer</i>) [A003]; Cormorant (<i>Phalacrocorax carbo</i>) [A017]; Grey Heron (<i>Ardea cinerea</i>) [A028]; Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]; Wigeon (<i>Anas penelope</i>) [A050]; Teal (<i>Anas crecca</i>) [A052]; Red-breasted Merganser (<i>Mergus serrator</i>) [A069]; Ringed Plover (<i>Charadrius hiaticula</i>) [A137]; Golden Plover (<i>Pluvialis apricaria</i>) [A140]; Lapwing (<i>Vanellus vanellus</i>) [A142]; Dunlin (<i>Calidris alpina</i>) [A149]; Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]; Curlew (<i>Numenius arquata</i>) [A160]; Redshank (<i>Tringa totanus</i>) [A162]; Turnstone (<i>Arenaria interpres</i>) [A169]; Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]; Common Gull (<i>Larus canus</i>) [A182]; Sandwich Tern (<i>Sterna sandvicensis</i>) [A191]; Common Tern (<i>Sterna hirundo</i>) [A193]; Wetland and Waterbirds [A999]	Physical disturbance from harvesters/ impacts to water quality and food sources
Lough Mask SPA IE004062	Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]	

Table 10 (cont'd) – Habitat and species screened in for Stage 2 Appropriate Assessment

4.10 Screening Outcome

In total, screening has found likely significant effects on 15 SACs and 3 SPAs because of the proposed seaweed harvesting by Arramara Teo. It is not possible to exclude likely significant effects from underwater disturbances on mobile marine mammals such as harbour porpoises, bottlenose dolphins, grey seals, and common seals.

In summary, the following species and their associated SACs and SPAs have been screened in for Stage 2 Appropriate Assessment:

- Common seal
- Otter
- Freshwater Pearl Mussel
- Salmon
- Black-throated Diver
- Great Northern Diver
- Cormorant
- Grey Heron
- Light-bellied Brent Goose
- Wigeon
- Teal
- Red-breasted Merganser
- Ringed Plover
- Golden Plover
- Lapwing
- Dunlin
- Bar-tailed Godwit
- Curlew
- Redshank
- Turnstone
- Black-headed Gull
- Common Gull
- Sandwich Tern
- Common Tern
- Lesser Black-backed Gull
- Wetland and Waterbirds
- Mudflats and sandflats not covered by seawater at low tide
- Large shallow inlets and bays
- Reefs
- Perennial vegetation of stony banks
- Atlantic salt meadows
- Mediterranean salt meadows

5.0 Conclusion

This report evaluates the need for the Appropriate Assessment Process to determine if the proposed project, alone or in combination with other plans, will likely impact any European site(s). Using the Source-Pathway-Receptor approach, we assessed the conservation interests of European sites that could be affected. After thorough analysis, it was concluded that significant impacts on the conservation goals of these sites, either from this project alone or in combination with other plans, cannot be excluded.

Conclusion	Potential Outcome	Outcome
Inner Galway Bay South		
The project is directly connected to or necessary for the management of a designated site.	Stage 2 Appropriate Assessment is not required.	
No potential for significant effects	Stage 2 Appropriate Assessment is not required.	
The potential for significant effects identified, or the potential for impacts is uncertain.	Stage 2 Appropriate Assessment is required, and a Natura Impact Statement will be prepared	X

Table 11- Results of Screening for Appropriate Assessment in Inner Galway Bay South

The proposed seaweed harvesting operation could have a significant negative impact on the Qualifying Interests/Special Conservation Interests identified or conservation objectives of the relevant SACs and SPAs. Therefore, it is concluded that an Appropriate Assessment is required.

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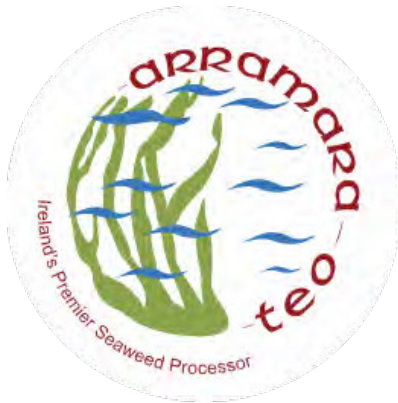
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APPENDIX A

Literature Review of Commercial Harvesting of *Ascophyllum nodosum*

**Document in support of a Marine Usage License Application
presented to the Maritime Area Regulatory Authority**

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1. *Ascophyllum nodosum* Biology & Ecology

Ascophyllum nodosum (also known as rockweed) is a member of the order Fucales. It is a perennial brown seaweed found in the intertidal zone from the Arctic Circle to New Jersey and the White Sea to Portugal. It is found in a range of wave-exposures on stable substrate but is replaced or mixed with other related species (i.e. *Fucus spp.*) in the most exposed and ice-scoured areas. It is the predominant species found in the rocky intertidal zone along the Atlantic coastline of Eastern Canada, on sheltered shores in the West of Ireland and on the Scottish intertidal coastline and elsewhere, where it forms extensive beds (Baardseth, 1970; Sharp, 1986; Burrows *et al.*, 2010; Guiry & Morrison, 2013).

Ascophyllum nodosum is attached to rocks or bedrock by a holdfast. Shoots arise from the holdfast and develop as a complex assemblage of branching dominant shoots and basal or suppressed shoots. As the tide rises, the plant floats due to gas bladders (vesicles) on the shoots, creating a floating canopy. Most new shoots arise vegetatively from existing basal holdfast tissue. As the plants grow, their holdfasts coalesce with the holdfasts of adjacent plants, forming clumps (Cousens, 1984; Sharp, 1986; Ugarte, 2011). Annual vegetative biomass production in the Canadian Maritimes and Maine, USA could be as high as 55% (Cousen, 1984; Vadas *et al.*, 2004).

In the spring, reproductive receptacles, containing either egg or sperm-producing tissues, form along the sides of shoots. Gametes are released in late spring or early summer and the receptacles fall off shortly afterward. Newly settled germlings are extremely vulnerable to grazers and wave action (Vadas *et al.* 1990). As a result, the recruitment of new plants is episodic. Holdfasts can be long-lived (Aberg, 1992) but individual shoots are rarely over 17 to 20 years old (Lauzon-Guay *et al.* 2022). Growth is not only apical but also occurs in older parts of the frond (Lauzon-Guay *et al.* 2022). Length increases on each main distal branch from 10 to 20 cm per annum, depending on geography (Kay *et al.* 2016).

Rockweed forms a very stable canopy in the intertidal zone; however, storms, ice and forms of pollution can reduce the abundance or restrict distribution (Sharp, 1986). Any foreshore development that changes the bottom type, such as boulder removal or siltation, will reduce abundance and distribution. The high density of lateral and basal shoots in a clump and the distribution and biomass of clumps in the intertidal zone also create a complex habitat for invertebrates and fish during the tidal cycle (Rangeley & Kramer, 1998).

2. Commercial Harvesting of *Ascophyllum nodosum*

Ascophyllum nodosum is commercially harvested in Canada (Ugarte & Sharp, 2001 & 2012), USA, Western Ireland (Walsh, 2012), Scotland (Burrows *et al.*, 2010), France, Norway and Iceland.

2.1. Canada

In Canada, *Ascophyllum nodosum* is harvested in the provinces of Nova Scotia and New Brunswick. The intertidal zone is considered crown land and is managed by the provincial and federal governments. The standing stock of *Ascophyllum nodosum* present in the two provinces combined is estimated at 352,723 tonnes. The harvest is predominately done from boats with harvesters using cutter rakes mounted on three-metre poles. Mechanical harvesters and hand harvest on foot at low tide were used in the past in Nova Scotia, and were largely discontinued (Ugarte & Sharp, 2001) until recently when mechanical harvesters were re-introduced in the province of Nova Scotia following several years of experimental harvest, monitored by the government. *Ascophyllum*



nodosum has been harvested since the late 1950's, and in recent years, 40,000 tonnes is harvested annually (Ugarte and Sharp 2012). Approximately 120 individuals participate in harvesting *Ascophyllum nodosum* in Canada each year (DFO, 1998).

2.2. Maine, USA

A preliminary, remote-sensing analysis shows an estimated 2.37 million tonnes of *Ascophyllum nodosum* and *Fucus spp.* on the coast of Maine, USA (Stefan Claesson, Nearview Ltd, pers. comm.). Commercial-scale *Ascophyllum nodosum* harvesting operations began in Maine in the 1970s. In the 1980s, Maine laws were enacted that required the Department of Marine Resources (DMR) to issue harvester licenses for a fee, issue violation fees, and establish a dedicated seaweed management fund (a per-landed-ton fee is paid into this fund).

Between 2017-2022, 125 harvesting permits were issued (Webber et al., 2024). As much as 10,500 tonnes of *Ascophyllum nodosum* has been harvested in a year throughout the state (DMR Landings data, 2023). The harvest is conducted either with mechanical harvesters or by boat and rake. A 2019 court ruling established that seaweed growing in the intertidal zone is the property of the upland landowner and that permission is required from the landowner to harvest seaweed.

2.3. Ireland

In Ireland, *Ascophyllum nodosum* accounts for 95% of total Irish seaweed landings (MacMonagail et al., 2021). There is an estimated 75,000 to 159,000 tonnes of *Ascophyllum nodosum* available for harvest in Ireland (Culliane 1984, Hession 1998). Historically, 8,000 to 28,000 tonnes of *Ascophyllum nodosum* have been harvested in Ireland (Guiry & Morrison, 2013). In 2012, 30,000 tonnes of *Ascophyllum nodosum* was harvested by approximately 40 enterprises, employing upwards of 300 people. Over 80% (32) were micro-enterprises employing five or fewer people (Walsh, 2012).

Ascophyllum nodosum is harvested in Ireland using two different methods: traditional hand harvesting, and boat and rake harvesting. Traditional hand harvesters use small knives at low tide to cut the fronds, leaving about 25 cm at the base, which is sufficient material for regeneration after a 3-to-5-year fallow period, depending on the regrowth of the bed (Guiry & Morrison, 2013; MacMonagail et al., 2017). Boat and rake harvesters utilise specially designed boats that they manoeuvre to target seaweed beds on the rising tide. The harvester cuts seaweed using a specially designed cutting rake that allows the harvester to target and trims individual plants before depositing them in the boat. All rakes are equipped with a guard to prevent the cutting from occurring too close to the holdfast, in case a harvester inadvertently hits the bottom or a rock.

2.4. Scotland

The total amount of *Ascophyllum nodosum* in the Outer Hebrides of Scotland was estimated to be 170,500 tonnes (Burrows et al., 2010). It is estimated that the present accessible area would yield 60,700 tonnes of *Ascophyllum nodosum* (36% of the total). With improved infrastructure, the accessible amount could rise to 97,000 tonnes (Burrows et al., 2010).

In Scotland, the harvesting of *Ascophyllum nodosum* was traditionally done manually using a sickle, and more recently using a boat and rake and mechanically using a seaweed harvesting boat. Traditional hand harvesting occurs at low tide. The harvesters encircle the chosen area with a rope or net and then cut the *Ascophyllum nodosum* down to about 25 cm within that area. When the tide returns, the seaweed floats to form a large circular bail and is towed by a small boat to the landing area. Individual cutters handle their cutting areas and rotate the areas to ensure



sustainability. Cutting occurs only near the tops of the fronds, allowing the seaweed to grow relatively quickly (Hebridean Seaweed Company website July 2011).

2.5. Iceland

The harvest of *Ascophyllum nodosum* in Iceland is concentrated in Breiðafjörður on the west coast of the country. Over the last four years, an average of 17,000 tonnes has been harvested each year by mechanical harvesters. The estimated standing stock is estimated at 1,100,000 to 1,300,000 tonnes (Gunnarson et al. 2017).

2.6. Norway

An estimated 1,800,000 tonnes of *Ascophyllum nodosum* is found along the coast of Norway (Baardseth 1970) with an annual harvest between 10,000 and 20,000 (Meland and Rebours). The harvest is conducted mainly by one company that uses mechanical harvesters.

3. Regulations for Harvesting *Ascophyllum nodosum*

3.1. Canada

Area-based management of *Ascophyllum nodosum* was introduced in Nova Scotia, Canada in the late 1970s. This approach places harvesting controls on relatively small geographic sectors. Initially, the sectors were not well monitored or controlled, and there were no harvestable biomass targets for each area. Also, there was little to no consideration given to the impacts of harvesting and protection of the *Ascophyllum nodosum* habitat and associated ecosystem (Sharp et al., 2006).

In 1995, a joint Federal-Provincial Memorandum of Understanding coordinated the resource management in New Brunswick, Canada. A *Ascophyllum nodosum* Management Committee reviews the annual management plans, and the industry produces harvest reports on an annual basis. Since 1995, seaweed management in New Brunswick, in particular that of *Ascophyllum nodosum*, has used an evidenced based but highly precautionary approach. Both provinces have established a maximum harvest rate, a minimum cutting height (12.5 to 25 cm), plus a maximum allowable holdfast removal rate (10%). They also impose gear restrictions and employ protected areas to ensure the sustainability of the seaweed resource as part of the wider coastal ecosystem (Ugarte & Sharp, 2001 & 2011). This ongoing and active management approach uses data from all sources (harvesters, researchers, stakeholders and licensed companies) to customise annual harvest plans in response to local and seasonal situations. The approach provides licensed companies with long-term harvesting rights, which in turn gives the companies security of raw material supply, allowing them to invest in research and further refinement of sustainable harvesting methods and to seek to develop value-added products from the harvested biomass (Chopin & Ugarte, 2006).

In both provinces, lease agreements for large sections of the shoreline are awarded exclusively to a single company for a period of up to 15 years. Companies rely on harvesters to harvest the seaweed. Each lease is divided into harvesting sectors. Companies must submit biomass assessments to the government prior to any harvesting activities taking place in a sector. The harvest rate of *Ascophyllum nodosum* is the proportion of the standing stock that is harvested annually. The province of New Brunswick implemented a 17% harvest rate at the onset of the fishery in 1995 as a precautionary measure. At the time, limited information was available, and one study suggested that a bed would recover after three years when 50% of the biomass was removed ($50\% / 3 \text{ years} = \sim 17\% \text{ per year}$). The neighbouring province of Nova Scotia allows up to 25% of the



biomass to be removed annually. Over the last 3 years, a 25% harvest rate has been applied to some sectors in New Brunswick as more recent studies indicated that a harvest at 25% was sustainable (Lauzon-Guay et al 2021).

Harvesters keep daily logs of their harvest tonnage, and companies must provide monthly reports on harvest per sector to the provincial governments. When the harvest within a sector has reached its yearly quota, the sector is closed to the harvest until the following year. To optimise the manual harvesting of seaweed and balance that against the productivity of each harvester and the sustainable management of the seaweed resource, the approach to assign sectors to individual harvesting crews, with set quotas and monitoring of daily landings, has proved to be extremely effective, so much so that each sector does not require a fallow period (Ugarte & Sharp, 2011). Through the careful monitoring of *Ascophyllum nodosum* biomass within each harvest sector, the effects of other influences on the available harvestable *Ascophyllum nodosum* resource can be determined, such as the effects of changes in climate, pollution, grazers, disease and other factors that affect the biomass and re-growth. This allows for the level of sustainably harvestable seaweed to be calculated and adjusted on a regular (and ideally frequent) basis.

3.2. Maine, USA

In 2000, the Maine Department of Marine Resource (DMR) implemented a 40 cm minimum cutting height for *Ascophyllum nodosum* and mandated landings reporting. In 2019, DMR began requiring landings to be reported by established state seaweed sectors. In 2009, the Cobscook Bay Rockweed Management Area was established by statute. This area has additional regulations that do not apply to the rest of the state. The Cobscook Bay Management area is like the seaweed management regulations in New Brunswick. Cobscook Bay is divided into 36 harvest management sectors. Harvesters apply for sectors allocated annually at the beginning of the year. No more than 17% of the total biomass per sector may be harvested per year, and the total *Ascophyllum nodosum* biomass in each sector must be provided based on a survey conducted within the previous three years. Some areas designated by DMR are closed to harvesting for research and conservation, and harvesters must make reasonable efforts to return any bycatch collected while harvesting to the ocean (Title 12 6803-C, 2009).

In 2014, the State drafted the Fishery Management Plan for Rockweed, proposing additional regulations such as statewide exploitation rate limits, seasonal closures, designated areas closed to harvesting, and bycatch limits. (Maine DMR-RMDT 2014 Fishery Management Plan for Rockweed). However, the long-disputed legality of *Ascophyllum nodosum* ownership has hindered the State's implementation of this management plan.

3.3. Scotland

Although Crown Estates Scotland owns most of the coastline in Scotland, some are privately owned therefore, agreements are required with the shoreline owners to be able to harvest seaweed. Scotland has no set regulations for the harvest of *Ascophyllum nodosum*, but a management plan must be submitted and approved by NatureScot before harvesting operations can take place. Regulation will depend on the area where the harvesting operations take place and the proximity to Special Areas of Conservations and Special Areas of Protection. A maximum harvest rate of 20% of the standing stock is generally used in the Outer Hebrides. Seasonal closures near seal haul-out sites are also in place. In the Outer Hebrides, Scotland, a 25% maximum harvest rate is recommended (Burrows et al., 2010).



4. Harvesting Impacts

Recent studies have shown that most beds where up to 50% of the biomass is removed will recover within one year (Ugarte et al 2006, Johnston et al 2023, Feibel et al 2023), and that after 20 years of commercial harvest, there is no long-term impact of a 25% annual harvest rate on bed biomass (Lauzon-Guay et al 2021). If the harvesting of *Ascophyllum nodosum* is undertaken using a pulse strategy at rates above 50% of the harvestable crop, the stand requires a three to five-year period to recover (Ugarte & Sharp, 2011); however, the optimum regeneration period for *Ascophyllum nodosum* has been found to vary at each location and be directly related to harvesting intensity (Seip, 1980).

A recent study has shown that *Ascophyllum nodosum* in beds that have been harvested for 20 years have the same morphology as individuals at non-harvested sites (Lauzon-Guay et al 2023). However, immediately after harvest, net changes in canopy height and biomass are apparent within harvested patches (Ugarte et al 2006). These changes quickly become diluted to small differences between harvested and un-harvested stands when placed in the context of the entire bed (Johnston et al 2023) and intertidal landscape. These structural changes are short-lived and compensated for by the overall production during the summer and autumn months, thus redeveloping the complexity of the bed within a year. To ensure rapid regrowth, it is recommended that there is a minimum cutting height of 20 to 25 cm from the base of the holdfast (DFO, 1998; Burrows et al., 2010).

The *Ascophyllum nodosum* habitat also offers shelter from predation during immersion within the floating clumps. In Ireland, Kelly et al. (2001) found no effect of mechanical or hand harvesting on community diversity. Trott & Larsen (2012) found that two months after harvesting *Ascophyllum nodosum*, using the New Brunswick harvesting method, the epifaunal populations associated with beds of *Ascophyllum nodosum* in Maine, USA were unaffected; there were no differences in the populations from the harvested and un-harvested areas. The same results were found in a recent study in Jonesport, Maine, USA (Dr. Brian Beal – U. Maine, Machias, pers. comm.) and with adult fish and their larval stages in New Brunswick (Van Guelpen and Pohle 2014). Lauzon-Guay et al. (2023) also compared the biomass of littorinids at control and harvested sites and found no significant difference. Field studies have not detected any significant long-term impact of *Ascophyllum nodosum* harvesting on invertebrate communities associated with *Ascophyllum nodosum* beds (Fegley 2001, Hamilton and Nudds 2003, Phillippi et al 2014, Mittelstaedt 2024). A 2024 study from Maine has found no evidence for an effect of *Ascophyllum nodosum* harvesting on bird visitation at the sites (Johnston et al 2024). In literature review presented to the Maine *Ascophyllum nodosum* Working Group, Dr. Brian Beal from the University of Maine concluded that “any negative effects on habitat and invertebrate densities due to removal/harvesting of rockweed are short-lived or were not statistically detectable” (Beal 2015).

Holdfast removal can be an issue; however, the level of holdfast material in any harvested *Ascophyllum nodosum* can be due to several reasons such as a friable substratum, a naturally damaged clump, the level of harvest and the type and condition of the harvesting tool. With low harvest levels and the careful design and maintenance of cutting tools, the holdfast removal rate can be managed and minimised (Ugarte, 2011). Ugarte (2011) also found that even when there are very robust management systems in place, including the use of special, well-maintained, handheld cutter rakes designed to cut the *Ascophyllum nodosum* plants and not dislodge the clumps and their holdfasts, close to 6% of the biomass harvested annually contains holdfast material. Analysing the effect of harvest on the holdfast clumps, Ugarte (2011) found that the rakes



were removing only about 17% of the holdfast surface of any affected clump. This significantly reduced the mortality of those clumps and, consequently, had a positive effect on the recovery of the seaweed. The study also compared the effects of harvesting to the levels of natural storm-cast *Ascophyllum nodosum* (i.e. dislodged plants cast upon the high-water mark of the shore) over the same period (2004), which showed a similar effect on clump structure; however, the incidence of holdfast detachment, due to storms, was shown to be as high as 30%.

It can take *Ascophyllum nodosum* quite some time to re-establish after total removal from an area; in a study undertaken in Iceland, Ingólfsson & Hawkin (2008) found that it took 7 to 8 years for the seaweed to re-establish; however, even after 20 years the original ecology had not recovered from the clearance; while Jenkins *et al.* (2004) found that the complete removal of *Ascophyllum nodosum* from a site on the Isle of Man, UK resulted in the development of a mix of *Fucus serratus*, *Fucus vesiculosus* and *Ascophyllum nodosum*, as well as other long-term changes to the immediate ecology that did not recover, even after completion of their 12-year study. Interestingly, carefully managed harvesting of *Ascophyllum nodosum* can enhance the growth of the seaweed due to a stimulation of growth and branching of suppressed shoots of the clumps, increased light availability, improved water flow and availability of nutrients (Sharp & Pringle, 1990; Lazo & Chapman, 1996; Ugarte, 2006; Trot & Larsen, 2012).

5. Regulation of Harvest of Other Seaweed Species

5.1. Chile

The absence of regulation resulted in the collapse of the natural beds of *Gracilaria chilensis* in Southern Chile (Santelices & Ugarte, 1987; Santelices & Doty, 1989). Also, in Chile, the harvest of the brown seaweed *Lessonia nigrescens*, the world's largest harvest of wild seaweed stock, is under a type of government management (Vásquez, 2008). In this case, recommendations for harvest amounts are not based on a precautionary approach. However, the focus is on the harvest methodology, which itself is based on biological and ecological parameters rather than harvest quantities and concessions of shoreline areas. The principle has been “how you harvest is more important than how much you harvest” (Vásquez *et al.*, 2012). The method used was coproduced involving a wide range of stakeholders. Since implementation in 2006, in 2011, Vásquez & Piaget reported that the agreed management strategy seemed to work.

However, more recently (2013), after a study of the level of harvesting of several seaweed species (*Lessonia trabeculata*, *L. nigrescens* and *Macrocystis* spp.) in the Actacama region of Chile, it was found that more of those seaweed species had been harvested in the first six months of 2013, then the biologically acceptable quota for the entire year. Therefore, due to the urgent need for conservation measures and proper resource administration, the Management Committee of Kelp of the Actacama Region III (formalised in 2012) banned harvesting during the last four months of 2013 (Fish Information Service, 2013). This appears to be a case where, despite the regulation of harvesting of the seaweed resource being co-produced and regulated by various stakeholders, that agreed regulation did not address all aspects of the exploitation of the resource and has led to its over-exploitation. Therefore, “how much you harvest” and “how you harvest” appear important, especially for *Lessonia nigrescens*. On the positive side, monitoring the exploitation of the resource has allowed remedial action to be taken (authors note).

There is a growing demand for *Lessonia trabeculata* for use in biomedical and pharmaceutical products. This seaweed is harvested by semi-autonomous divers who appear not to respect



harvesting recommendations; they exceed plant removal distances, do not consider the minimal size of extraction and return to harvest sites before populations have had the chance to recover (Vásquez *et al.*, 2012), all of which contribute to unsustainable harvesting practices as well as damage to the marine ecology.

Borras-Chavez *et al.* (2012) undertook a two-month study to determine a better harvesting technique for *Macrocystis pyrifera* in Northern Chile (than that used at that time, i.e. cutting all the fronds from all the plants) whilst also investigating the impact of the harvest techniques on the seaweed understory diversity and herbivore abundance. They found that the removal of half of the fronds from all the plants was the best method for maintenance of the resource for future harvest as it allowed for rapid growth of new fronds on the harvested individuals, which in turn promoted recruitment of new individuals and reduced herbivore densities through physical abrasion.

5.2. South Africa

In South Africa, concessions of shoreline are given to individuals or organisations to manage the available resources (i.e. *Ecklonia maxima*) based on some biological conservation principles (Anderson *et al.*, 1989, 2003); however, information on the size of the stock or how the landings or quotas were controlled is not clear, nor available.

5.3. Norway

In Norway, the mechanised harvesting of *Laminaria hyperborea*, which began 60 years ago, is now under a management regime developed and refined in a partnership between the Norwegian government, the seaweed industry, researchers and other stakeholders (i.e. fishermen). The management program was developed using a clear understanding of the ecology and life cycle of the seaweed and the wider ecosystem and predominantly uses a five-year cycle and rotating zones as the plan's foundation (Vea & Ask, 2011). The harvesting of *Laminaria hyperborea* typically (but not exclusively) falls under the Norwegian Marine Resources Act (2009), which has a set of principles that ensure the sustainable and economically profitable management of living marine resources and promote employment and settlement in coastal communities.

Since 1972, the Norwegian coastline has been divided into harvesting fields, with a width of about one nautical mile, each initially having four zones. In 1992, these were increased to five zones used for the (initially four, now five-year) harvest cycle (Vea & Ask, 2011).

However, due to the management and monitoring being undertaken within relatively small areas (like the Nova Scotia and New Brunswick approaches); it has enabled a small area in the south of the country (viz. Rogaland) to return to a four-year cycle, as studies have shown that the kelp grew faster in that area (Sjøtun, 2000). The new management regime has been in place for ten years and seems to have maintained the resource in good condition (Vea & Ask, 2011). Sustainable management protocols for exploiting seaweeds will vary due to individual seaweed biology and their specific (local) habitat, the economics of harvesting, the type of harvesting equipment used, and the political, social and other wider economic factors at any given time.

In other words, there is no “one size fits all” solution to developing a sustainable seaweed harvest. However, some key principles are being developed, along with required tools to monitor and research the impact of seaweed harvesting that will continue to feed into (what should be) developing, evolving and adaptable harvest plans for the commercial but sustainable exploitation of natural seaweeds (authors notes).



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APPENDIX B

Ecological Assessment – Inner Galway Bay South

1. Methodology

Horizontal and vertical shore transects were taken at each of the locations. Vertical shore transects with multiple quadrats allowed a description of the extent of the biotopes present in the survey sites. Data recorded included substrate type, wave exposure, GPS positions of transects and width of the algal band on the shore. Fauna and epiphytic algae were also recorded. As the shores tended to be composed of hard substrates such as bedrock, boulders, cobble and gravel, collecting cores for the fauna was impossible.

A description of Inner Galway Bay South, including a description of each biotope recorded and the fauna encountered, as well as the extent of the biotope, is outlined below. Descriptions of the biotopes are from the JNCC Marine Habitat Classification for Britain and Ireland (Connor *et al.* 2004).

Inner Galway Bay South

Inner Galway Bay South is part of Galway Bay Complex cSAC (IE000268) and Inner Galway Bay SPA (IE004031). Galway Bay South holds a high number of littoral communities (12) which range from sandy beaches with rock or sand dunes behind to rocky terraces. The sediments of the intertidal support good examples of communities that are moderately exposed to wave action. A well-defined talitrid zone in the upper shore gives way to an intertidal, mid-shore zone with sparse epifauna or infauna. On the lower shore, the tubes of the deposit-feeding terebellid worm, *Lanice conchilega*, are common. Small crustaceans, nereid and cirratulid polychaete worms (*Arenicola marina*, *Hediste diversicolor*) and bivalves (*Cerastoderma edule*, *Angulus tenuis* and *Macoma balthica*) are present. The area has the country's only recorded example of the littoral community characterised by *Fucus serratus* with ascidians, sponges and red seaweeds on tide-swept lower eulittoral mixed substrata. The rare sea urchin *Paracentrotus lividus* and the foliose red alga *Phyllophora sicula* are present at Finavarra, whereas the red alga *Rhodomenia delicatula* and the rare brown alga, *Ascophyllum nodosum* var. *mackii*, occur in Kinvara and Muckinish Bays (NPWS, 2006b).

The intertidal surveys revealed bedrock, mud with rock and mixed substrates. *Pelvetia canaliculata* and *Fucus spiralis* occurred on the upper shore, while *F. vesiculosus* and *Ascophyllum nodosum* occurred on the mid to low shore and *F. serratus* on the lower shore. *Ulva* sp. was also recorded on the lower shore. Fauna of the upper *Ascophyllum nodosum* band were: *Spirorbis* sp., amphipods, *Patella vulgata*, *Arenicola* sp., *Littorina obtusata*, barnacles, *Littorina littorea*, *Actinia equina* and *Carcinus maenus*. Mid band fauna were *Spirorbis* sp., *L. obtusata*, *L. littorea*, sponge, barnacles and *C. maenus*. Fauna of the lower band were *Spirorbis*, *L. littorea*, *C. maenus*, hydroids, *Mytilus edulis*,



bryozoans and barnacles. Table 2 outlines the extent of the biotopes found at this location in the upper, middle and lower shore. These biotopes are briefly outlined in Table 1.

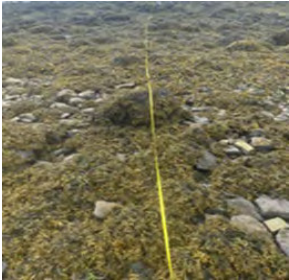
	LR.LLR.F.Pel. <i>Pelvetia canaliculata</i> on sheltered littoral fringe rock JNCC Biotope Description JNCC Biotope Classification Lower littoral fringe bedrock or stable boulders and mixed substrata in sheltered to extremely sheltered conditions characterised by a dense cover of the <i>Pelvetia canaliculata</i>. The biotope may be present in localised sheltered patches on moderately exposed shores. Individuals of the <i>Fucus spiralis</i> can usually be found among the <i>P. canaliculata</i> and/or in lower part of the biotope.
	LR.LLR.F.Fspi.X. <i>Fucus spiralis</i> on full salinity upper eulittoral mixed substrata JNCC Biotope Description Moderately exposed to sheltered full salinity upper eulittoral mixed substrata characterised by a band of <i>Fucus spiralis</i> with occasional clumps of the <i>Pelvetia canaliculata</i>. This zone usually lies below a zone dominated by <i>P. Canaliculata</i> (PelB; Pel).
	LR.LLR.F.Fspi.FS. <i>Fucus spiralis</i> on full salinity sheltered upper eulittoral rock JNCC Biotope Description Sheltered upper eulittoral bedrock characterised by a band of <i>Fucus spiralis</i>. This zone usually lies below a zone dominated by <i>Pelvetia canaliculata</i> (PelB; Pel), but occasional clumps of <i>P. canaliculata</i> may be present (usually less than common) amongst the <i>F. spiralis</i>. Fspi occurs above the <i>Ascophyllum nodosum</i> (Asc) and/or <i>Fucus vesiculosus</i> (Fves) zones
	LR.LLR.F.Fves.X <i>Fucus vesiculosus</i> on mid eulittoral mixed substrata JNCC Biotope Classification Sheltered and very sheltered mid eulittoral pebbles and cobbles lying on sediment in fully marine conditions typically characterised by <i>Fucus vesiculosus</i>. <i>Ascophyllum nodosum</i> can occasionally be found on larger boulders.

Table 1 - Description of Biotopes found throughout the MUL area

	LR.LLR.F.Asc.X. <i>Ascophyllum nodosum</i> on full salinity mid eulittoral mixed substrata JNCC Biotope Classification Sheltered to extremely sheltered full salinity mixed substrata characterised by a canopy formed by a mosaic of <i>Ascophyllum nodosum</i> and <i>Fucus vesiculosus</i>. Winkles are common and <i>Littorina littorea</i> and <i>L. obtusata</i> may occur in high densities, while species such as the limpet <i>Patella vulgata</i>, the shore crab <i>Carcinus maenas</i> and the whelk <i>Nucella lapillus</i> may also occur.
	LR.LLR.F.Asc.Fs. <i>Ascophyllum nodosum</i> on full salinity mid eulittoral rock JNCC Biotope Classification: Bedrock, stable boulders and cobbles in the mid-eulittoral zone of moderately exposed to extremely sheltered shores, in fully marine conditions, characterised by a dense canopy of <i>Ascophyllum nodosum</i>. This biotope is usually found between <i>Fucus spiralis</i> (Fspi) and <i>F. serratus</i> dominated biotopes (Fserr).
	LR.LLR.F.Fserr.X. <i>Fucus serratus</i> on full salinity lower eulittoral mixed substrata JNCC Biotope Description Sheltered to extremely sheltered full salinity lower eulittoral mixed substrata with dense stands of <i>Fucus serratus</i>. Fserr.X occurs in the lower eulittoral below the biotopes dominated by <i>A. nodosum</i> (Asc.X) on mixed substrata shores, or on sediment shores where mixed substrata occurs in discrete patches on the lower shore.

Table 1 (cont'd) - Description of Biotopes found throughout the MUL area

Bay	Biotope	LR.LLR.F.Pel	LR.LLR.F.Fspi.X	LR.LLR.F.Fspi.FS	LR.LLR.F.Asc.X	LR.LLR.F.Asc.Fs	LR.LLR.F.Fves.X	LR.LLR.F.Fves.FS	LR.LLR.F.Fserr. Fs	LR.LLR.F.Fserr.X	LS.LSa.MuSa. MacAre
Inner Galway Bay South	Transect Number	<i>Pelvetia canaliculata</i> on sheltered littoral fringe rock	<i>Fucus spiralis</i> on full salinity upper eulittoral mixed substrata	<i>Fucus spiralis</i> on full salinity sheltered upper eulittoral rock	<i>Ascophyllum nodosum</i> on full salinity mid eulittoral mixed substrata	<i>Ascophyllum nodosum</i> on full salinity mid eulittoral rock	<i>Fucus vesiculosus</i> on full salinity mid eulittoral mixed substrata	<i>Fucus vesiculosus</i> on full salinity moderately exposed to sheltered mid eulittoral rock	<i>Fucus serratus</i> on full salinity sheltered lower eulittoral rock	<i>Fucus serratus</i> on full salinity lower eulittoral mixed substrata	<i>Macoma balthica</i> and <i>Arenicola marina</i> in littoral muddy sand
	1	0-8m		0-8m	8-32m					31-32m	
	2	0-4m		0-8m	8-73m					54-102m	
	3	0-7m		0-9m	9~200m					97~200m	
	4	0-3m		0-6m	8-71m; 78-101m (band of mud from 71-78)		6-8m; 16-71m			110~150m	

Table 2 – Inner Galway Bay South - Biotopes present in upper shore, middle shore and lower shore





APPENDIX C

Biomass assessments of *Ascophyllum nodosum* and *Fucus spp.*

1. Introduction

The quantity of *Ascophyllum* and *Fucus* resources in Inner Galway Bay South, County Galway, was estimated using a combination of satellite imagery analysis and field surveys. This method has been employed previously in other jurisdiction and has led to the sustainable management of the *Ascophyllum nodosum* harvest over the last 25 years in Canada. The total bed area for each sector of the *Ascophyllum* and *Fucus* was calculated satellite imagery.

2. Bed Mapping

The area included as part of the MUL was defined by mapping the *Ascophyllum nodosum* and *Fucus spp.* beds in the regions of interest.

All the following work was completed in the open source QGIS project, version 3.28.2 Firenze (<https://www.qgis.org/en/site/>) or in ArcGIS Pro and Online (<https://www.arcgis.com/index.html>).

2.1 Satellite Imagery

The European Space Agency's Sentinel-2 (<https://sentinel.esa.int/web/sentinel/missions/sentinel-2>) mission consists of two optical Earth observation satellites, Sentinel-2A and Sentinel-2B. Depending on the spectral band, these satellites deliver free, high-resolution imagery with spatial resolutions of 10 m, 20 m, and 60 m. Sentinel-2 provides imagery across 13 multispectral bands, including visible (Red, Green, Blue), near-infrared (NIR), and shortwave infrared (SWIR). While the resolution is lower compared to commercial satellites, Sentinel-2 imagery is freely available and offers consistent global coverage. Additionally, Sentinel-2's revisit frequency of 5 days allows users to select imagery from specific timeframes, including those captured near low tide, depending on availability. Only bands with a 10 m spatial resolution were used in these analyses.

When choosing specific images for this project, two major factors had to be overcome. Firstly, the images had to be as close to low tide as possible. Secondly, images with as little cloud cover as possible were chosen, as the Sentinel satellites cannot produce accurate images through clouds. The most appropriate, cloud-free, and low-tide satellite images were chosen for further processing. Details of Sentinel-2 image acquisition are listed below (Table 1).

Bay	Image Acquisition Date and Time	Time of low tide
Inner Galway Bay South	28/04/2022. 12 pm	11.22 am

Table 1 – Acquisition Details of Sentinel-2 Image



As the *Ascophyllum nodosum* beds do not change significantly in size based on the time of year and do not change significantly in size from year to year, we were satisfied with the Sentinel imagery that was available and are confident that they will accurately describe the bed areas in the MUL area.

2.2 NDVI

The main purpose of using Sentinel 2 imagery was to utilize multispectral bands, more specifically, the near-infrared (NIR) and red band, to create an NDVI layer. NDVI stands for Normalized Difference Vegetation Index and is calculated for each pixel of the satellite images as:

$$(\text{NIR Reflectance} - \text{Red Reflectance}) / (\text{NIR Reflectance} + \text{Red Reflectance})$$

Because vegetation (e.g., trees, grasses, seagrass, and macroalgae) absorbs a much greater proportion of red light compared to near-infrared light, vegetation has high NDVI values compared to non-vegetation (e.g., rocks, sand, mud, water, etc.). By creating an NDVI layer and then calibrating it by including factors such as land masking (to eliminate land which contains trees, which are picked up with the NDVI) and the width of *Ascophyllum nodosum* beds measured in the field, we can use NDVI to measure bed area semi-automatically.

2.3 Using NDVI – Land Mask

Before reclassifying the NDVI image into areas of vegetation and non-vegetation, this project needs to isolate the areas where *Ascophyllum* and *Fucus* beds occur. If this step was not completed, the *Ascophyllum* and *Fucus* bed areas would run into low-lying marsh areas, seagrass beds, forested areas, etc., and a true bed area could not be calculated.

OSI high watermark coastal shapefile was used to act as a land mask for our NDVI. Anything covered by the land mask would be removed, and any vegetation remaining would be in the intertidal zone or shallow subtidal (i.e., intertidal macroalgae and shallow water seagrass). In some areas, the coastline was drawn too far out into the intertidal, and therefore, *Ascophyllum* and *Fucus* bed areas were being covered. Any inaccuracies in the land mask were manually corrected.

2.4 Using NDVI – Calibrating with Real-World Data

As mentioned above, we used the multispectral bands from the Sentinel 2 imagery to calculate an NDVI number across the entire image. Utilising the land mask, any vegetation highlighted will be macroalgae and seagrass. The next step in the bed mapping process was to ensure we only measured *Ascophyllum* and *Fucus* with the NDVI data. Appropriate NDVI cut-off points were applied based on previous experimental work on comparing the width of the beds in the field to the widths of the beds measured with the different NDVI cut-offs; the NDVI cut-off value with the closest fit to the measured bed's widths was chosen for this project.

2.5 Bed Polygons

After the raster image with the most appropriate NDVI cut-off value was chosen for each Sentinel-2 image, it was converted into a polygon shapefile. Any beds that overlapped two sectors were split along the sector boundary line. All beds were labelled with the correct sector information, and the area of each bed was calculated. The shapefiles were then reviewed to ensure any areas that were not *Ascophyllum nodosum* beds (based on field surveys) were removed. Following this initial delineation



of seaweed beds using NDVI, additional manual editing of the polygons was performed to refine boundaries and enhance accuracy due to the moderate resolution limitations of Sentinel-2 imagery.

While conducting fieldwork across the MUL area in Inner Galway Bay South, Arramara Teo field technicians also collected measurements to calibrate the NDVI data. At various locations where biomass transects were being completed, we measured the width of the *Ascophyllum nodosum* bed perpendicular to the shore. This bed width was recorded along with an accurate GPS position.

Visual observations were conducted on other aerial imagery to ensure that the threshold value selected accurately selected the *Ascophyllum nodosum* bed. Several other image classification methods were tested but did not provide better results than the method employed above.

3. Biomass Surveys

The field biomass surveys aimed to estimate the average biomass density of *Ascophyllum nodosum* and *Fucus spp.* in each sector, which will be used when calculating harvestable biomass. Sampling locations were selected haphazardly within the main beds, attempting to obtain a representative sampling within each sector. Sampling was done during a six-hour window around low tide.

A 30 m transect line was deployed at each sampling location in the middle of the *Ascophyllum nodosum* zone, parallel to the shore, with ten 50 × 50 cm (0.25 m²) quadrats randomly positioned along the transect length. All *Ascophyllum nodosum* and *Fucus spp.* shoots originating from the quadrat were then cut 25 cm away from the holdfast and weighed in a mesh dive bag using a digital hook scale. The mass of *Ascophyllum nodosum* and *Fucus spp.* above 25 cm from the holdfast per unit area is defined as biomass density in the present study. Importantly, we have detected no sampling bias between individuals making the measurements.

Seasonal reproduction of *Ascophyllum nodosum* occurs in late spring when reproductive receptacles rapidly increase in weight and can account for over 50% of the weight of a clump (Vadas *et al.* 2004). Because of this, all biomass data was collected between the end of the reproductive season after the shedding of receptacles in early May and early Autumn so that only vegetative biomass is included.

4. Biomass Estimation and Harvest Quantities

The average biomass density of *Ascophyllum nodosum* and *Fucus spp.* in each sector was multiplied by the bed area within the corresponding sector. This value represented the total seaweed biomass within the sector. The maximum yearly harvest per sector was calculated as 20% of the total biomass within a sector. A 25% harvest rate has been found to be sustainable over time (see Appendix A – Literature Review of Commercial Harvesting); however, we used a lower harvest rate as a precautionary measure.

