

NOTICE OF APPEAL UNDER SECTION 40(1) OF
FISHERIES (AMENDMENT) ACT 1997 (NO. 23)



Appeal Form

Please note that this form will only be accepted by REGISTERED POST
or handed in to the ALAB offices

Name of Appellant (block letters)	Coiste Glan agus Glas an Fhál Carraigh (Falcarragh Tidy Towns Committee) agus Cósta Glan agus Glas an Fhál Carraigh (Falcarragh Clean Coast Group) Máire Uí Bhaoill (Cathaoirleach) Oifigí eile: Máire Uí Chasaide, Brian Maguire, Dervla Collins, Sandy Alcorn, Tom Feeney, Sarah Sayers		
Address of Appellant	Cill Ulta, An Fál Carrach, Co Dhún na nGall		
Phone:		Email:	
Mobile:		Fax:	

Fees

Fees must be received by the closing date for receipt of appeals	Amount	Tick
Appeal by licence applicant	€380.92	
Appeal by any other individual or organisation	€152.37	x
Request for an Oral Hearing * (fee payable in addition to appeal fee) * In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded.	€76.18	x
(Cheques Payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 1998 (S.I. No. 449 of 1998))		
Electronic Funds Transfer Details	IBAN: IE89AIBK93104704051067	BIC: AIBKIE2D

Subject Matter of the Appeal

"Determination of Aquaculture / Foreshore Licencing application - T12/510
Tá an t-achomharc seo in éadan céadúnas doibharshaothraithe Uimhir T12/510A atá ceadaithe do Michael agus Fergal Havlin (Tully Shellfish) ag Cé Bhaile an Easa.
This appeal is against the granting of Licence No T12/510A for Aquaculture at Ballyness Bay to Tully Shellfish (Michael and Fergal Havlin)

Site Reference Number:- (as allocated by the Department of Agriculture, Food and the Marine)	T12/ 510A
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Please forward completed form to: Aquaculture Licences Appeals Board, Kilminchy Court, Dublin Road, Portlaoise, Co. Laois, A67, N91, Ireland.

**AQUACULTURE LICENCES
APPEALS BOARD**

2 JAN 2020



Appellant's particular interest in the outcome of the appeal:

Tá Coiste Glan agus Glas ag obair go dian, ó bunaíodh muid trí bliana déag ó shin, le aire a thabhairt d'ár dtimpeallacht álainn agus chun an timpeallacht sin a fheabhsú agus a chaomhnú do mhuintir na háite agus do na mílte turasóirí a thagann chun na háite gach bliain. Déanann an grúpa Cósta Glan agus Glas an dá thrá, Trá Bhaile an Easa agus Trá Dhroim na Tine, a ghlanadh go rialta, ceann den dá thrá achan mhí. Dírimid aird na dturasóirí ar an nadúr neamhghnáth atá le fáil thart ar ár gcósta.

Since its foundation 13 years ago Coiste Glan agus Glas, the local Tidy Towns Committee have been working tirelessly to enhance and improve our local environment for our own community in particular but also for the many tourists who visit this area on the Wild Atlantic Way every year. Our marks in the Tidy Towns Competition have increased every year. The local Clean Coast Group work to ensure our two beaches are kept in a pristine condition and litter free with clean-ups of both beaches on alternate months - Ballyness Beach one month, Drumnatinney Beach the next month. Both groups realise the jewels we have on our doorsteps and are aware of the wonderful diversity of wildlife we have in Ballyness Bay.

Outline the grounds of appeal (and, if necessary, on additional page(s) give full grounds of the appeal and the reasons, considerations and arguments on which they are based):

- The Minister exercised his discretion to grant this licence in an arbitrary and autocratic manner without proper enquiry into the impacts of the proposed aquaculture in the local area, having regard to the massive scale of not only this application but also the cumulative effect of the several other licences granted by the Minister around Ballyness Bay. To say that there were no objections to the proposed licence from a technical perspective is untrue because people in the area were unaware of this proposal. As soon as the community became aware a meeting was called at which over 700 people attended to voice their concern and objections. The fact is that it was tried to move the applications through the system in a surreptitious manner in order to avoid making the community aware. For example there were no planning application notices posted in any public spot where they could be viewed by the local community.
- This area is very much a disadvantaged area with the local economy largely depending on tourism; the results of a local survey indicate that over 214 jobs are created directly from visitors to this beautiful part of Ireland. We are on the Wild Atlantic Way and visitors from near and far come specifically to see our pristine beaches, our Golden Sands and the unique wildlife the area has to offer. To say "The proposed development should have a positive effect on the economy of the area" is far from the truth. There is no factual basis for this statement. By the applicant's own admission this **proposed licence will create 2 jobs** - one for the applicant (who lives over 100 km from Ballyness) and the other job a part time position. The reality is **this will produce absolutely no economic benefit to the area**. In fact the granting of this licence indicates the complete disregard this Minister and indeed this Government have for the wishes of small rural Gaeltacht communities. **There is no evidence of any cost / benefit analysis having been carried out to weigh the perceived benefits of the aquaculture against the inevitable adverse impact on local tourism related income and jobs.** Tugaimid cuireadh don Aire cuairt a thabhairt ar ár gceantar álainn go bhfeicfidh sé go díreach caidé atá i gceist againn
- Bealach Bhaile an Easa (Ballyness Way) - siúlóid atá réitithe ag Coiste Glan agus Glas agus Cósta Glan agus Glas (a walk in booklet form and on the falcarragh.com website). The Walk is about 4.5km long

from Ballyness Pier (where this proposed development is located) along the coast to the carpark at Drumnatinney Beach and is a guide offering information on heritage and wildlife. **See copy of Booklet Fig 1A attached.** There is no doubt this development will disturb and indeed endanger the habitats of many of the birds and sea creatures which use this area of coastline.

- This area is close to the eelgrass beds used by Geese
- The development will disturb seals which haul out on several nearby sandbanks; otters with their young which are often seen close to Ballyness Pier, as well as several species of geese and gulls which use the streams that run over the beach for drinking and washing and the nearby island for feeding
- It will disturb the Corncrake and Curlew which breed in nearby fields
- The Old Boathouse near this proposed development is a nesting site for Choughs.

The destruction of a quiet corner of a SAC and SPA site for private commercial gain is in contravention of the letter and spirit of EU Habitats and Birds Directive. It is clear the ecological damage caused by this proposed aquaculture development at Ballyness Bay is contrary to the purpose of a SAC, it is simply abuse of the EU designation of Ballyness Bay as a Special Area of Conservation



- This area at Ballyness Bay is an area of unspoilt natural beauty and is used by many for recreational purposes such as swimming, paddling, kayaking, sailing and indeed walking. The Minister wrongly assumes that there will be **"No significant impacts on the marine environment and the quality status of the area will not be adversely impacted."** Indeed this proposal will put the **Health and Safety** of recreational users at risk. How can children or indeed adults be allowed to swim, paddle, kayak safely without tramping on discarded oyster shells, old nails or hitting against the 808 trestles proposed for this particular area. Evidence is widely known in areas where Oyster Farming already takes place that lots of dangerous materials are discarded. This is completely contrary to the amazing workings of C osta Glan agus Glas who work diligently to keep our beach in the pristine condition it currently is. Furthermore it is stated in the granting of the licence that " Public access to recreational and other activities can be accommodated by this project". It is not clear they can be **safely accommodated.** **The proposed access** is the same access currently used by the many who enjoy this beach for the above recreational purposes, it is also used by bird watchers and dog lovers walking their pets. **FIG 2A showing access attached.** The **safety of the public will be greatly compromised** by heavy vehicles accessing this area for works associated with this Aquaculture Proposal. Indeed allowing heavy traffic through an SPA is indeed questionable.
- The granting of the proposed licences will have an adverse visual impact on the unspoilt natural

beauty of the area. This Oyster Farm Site T12/510A will be highly visible from various locations on the approach road to the beach and from the beach itself, it is the most visually intrusive of all the licences granted in Ballyness Bay. Locals and visitors alike come to Ballyness Pier to enjoy the views, nature and the environment and to walk in the area. This site will destroy all aspects of these and other amenities. These trestles will disrupt tidal flows in the area and erode the character, integrity and distinctiveness and scenic value of this coastal area.

See Fig 3A showing beauty of area, Fig 3B below showing Water Sports in area.



Fig 3A This is the exact location where this proposed Aquaculture Farm will be, highly visible by the public when the tide is out.

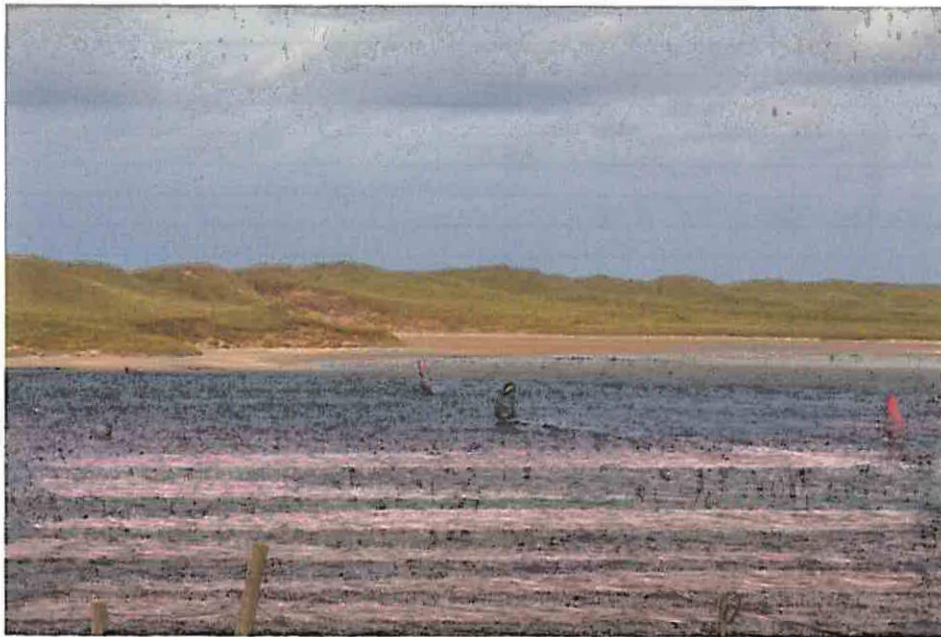


FIG 3B Surfers on this proposed site

- We feel this applicant was economical with the truth. When asked (xv) Is the site located in Designated Shellfish Waters Area he answered "Yes". The fact is this is not a Designated Shellfish Waters Area. Also in (xviii) he was asked Are there known sources of pollution in the vicinity e.g. sewage outfall? He answered No. The reality is there is a huge known untreated sewage outfall less than a 1km distance from this proposed site - **the equivalent of 240 wheelie bins of untreated sewage is being pumped into the bay daily.**
- The proposed aquaculture will interfere with the long standing tradition of taking seaweed from the shore to fertilise land. This has been a tradition enjoyed by the local community since time immemorial.
- In view of the lack of public notice and the lack of public participation in the application process to date we feel the Appeal's Board should allow an Oral Hearing of this Appeal in conjunction with other adjoining appeals having regard to the cumulative effect of the proposed Aquaculture in the Ballyness Bay Special Area of Conservation and an Oral Hearing should be allowed which would allow proper public participation in the decision making process.

Táimid ag cur ár n-iarratas don achomharc seo isteach d'ár nglún féin ach fósta don mhuintir atá ag teacht inár ndiaidh. We are making this appeal not only for the present but also to protect our local environment for future generations.

"The environment is on loan to each generation, which must then hand it on to the next" Laudato Si' 159.

It is beyond comprehension how this proposed licence can be allowed, how the greed of 2 individuals who have no associations whatsoever with this locality can be satisfied while having no regard for nature or the wishes of the local community.

Fee enclosed €152.37 plus Oral Hearing Fee of €76.18 - Total Sum enclosed €228.55 (payable to the Aquaculture Licensing Appeals (Fees) Regulations, 1998

Signed by appellant: Maire Uí Bhasail Date: 29/12/2019.
On behalf of Coiste Glan agus Glas An Fhál Carraigh (Falcarragh Tidy Towns Committee) agus Cósta Glan agus Glas (Green Coast Group)

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This notice should be completed under each heading and duly signed by the appellant and be accompanied by such documents, particulars or information relating to the appeal as the appellant considers necessary or appropriate and specifies in the Notice.

Extracts from Act

40.—(1) A person aggrieved by a decision of the Minister on an application for an aquaculture licence or by the revocation or amendment of an aquaculture licence may, before the expiration of a period of one month beginning on the date of publication in accordance with this Act of that decision, or the notification to the person of the revocation or amendment, appeal to the Board against the decision, revocation or amendment, by serving on the Board a notice of appeal.

(2) A notice of appeal shall be served—

(a) by sending it by **registered post** to the Board,

(b) **by leaving it at the office of the Board**, during normal office hours, with a person who is apparently an employee of the Board, or

(c) by such other means as may be prescribed.

(3) The Board shall not consider an appeal notice of which is received by it later than the expiration of the period referred to in subsection (1)

41.—(1) For an appeal under *section 40* to be valid, the notice of appeal shall—

(a) be in writing,

(b) state the name and address of the appellant,

(c) state the subject matter of the appeal,

(d) state the appellant's particular interest in the outcome of the appeal,

(e) state in full the grounds of the appeal and the reasons, considerations and arguments on which they are based, and

(f) **be accompanied by such fee**, if any, as may be payable in respect of such an appeal in accordance with regulations under *section 63*, and

shall be accompanied by such documents, particulars or other information relating to the appeal as the appellant considers necessary or appropriate.

Fig 2A

Access map

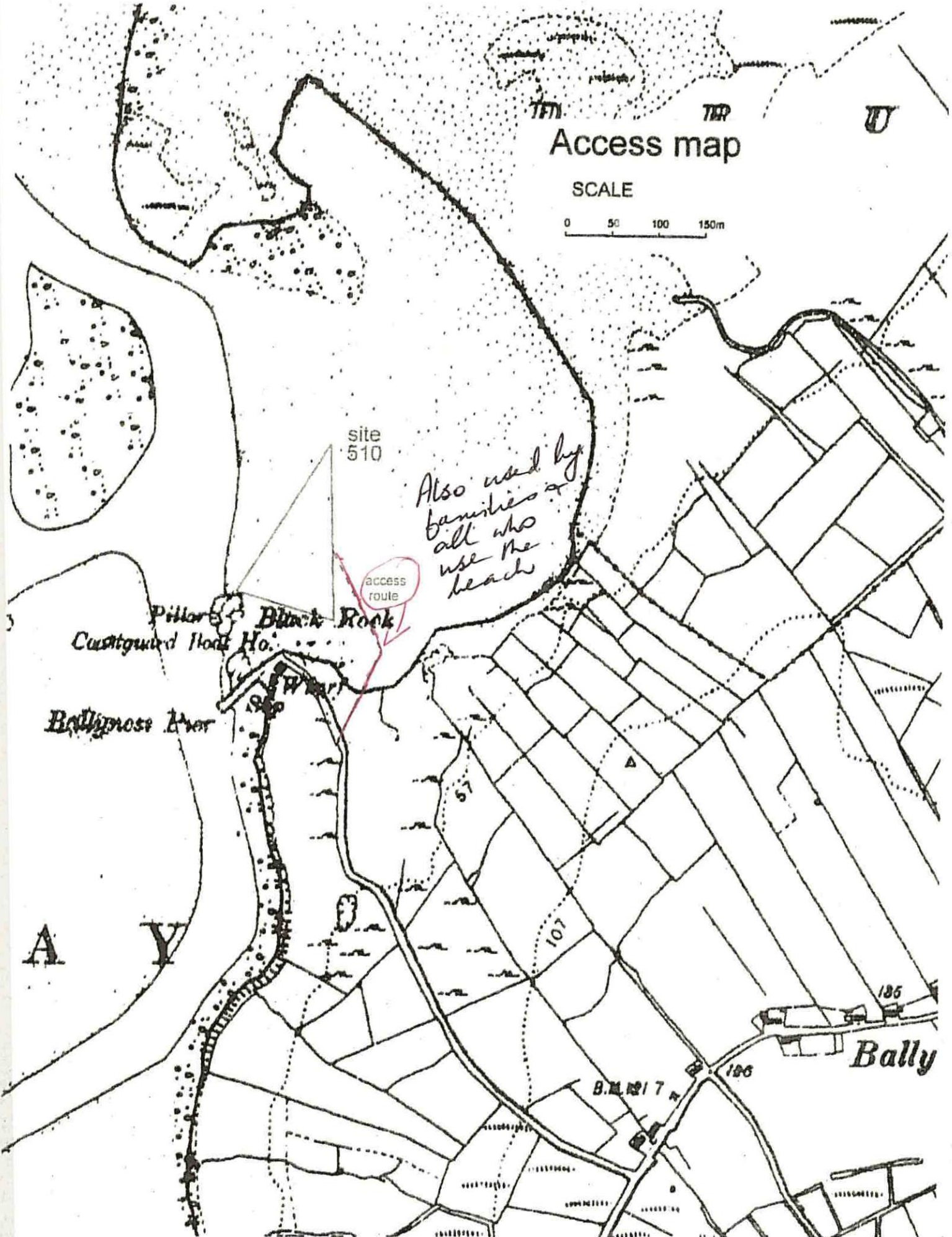
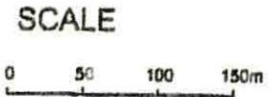


Fig 2A.

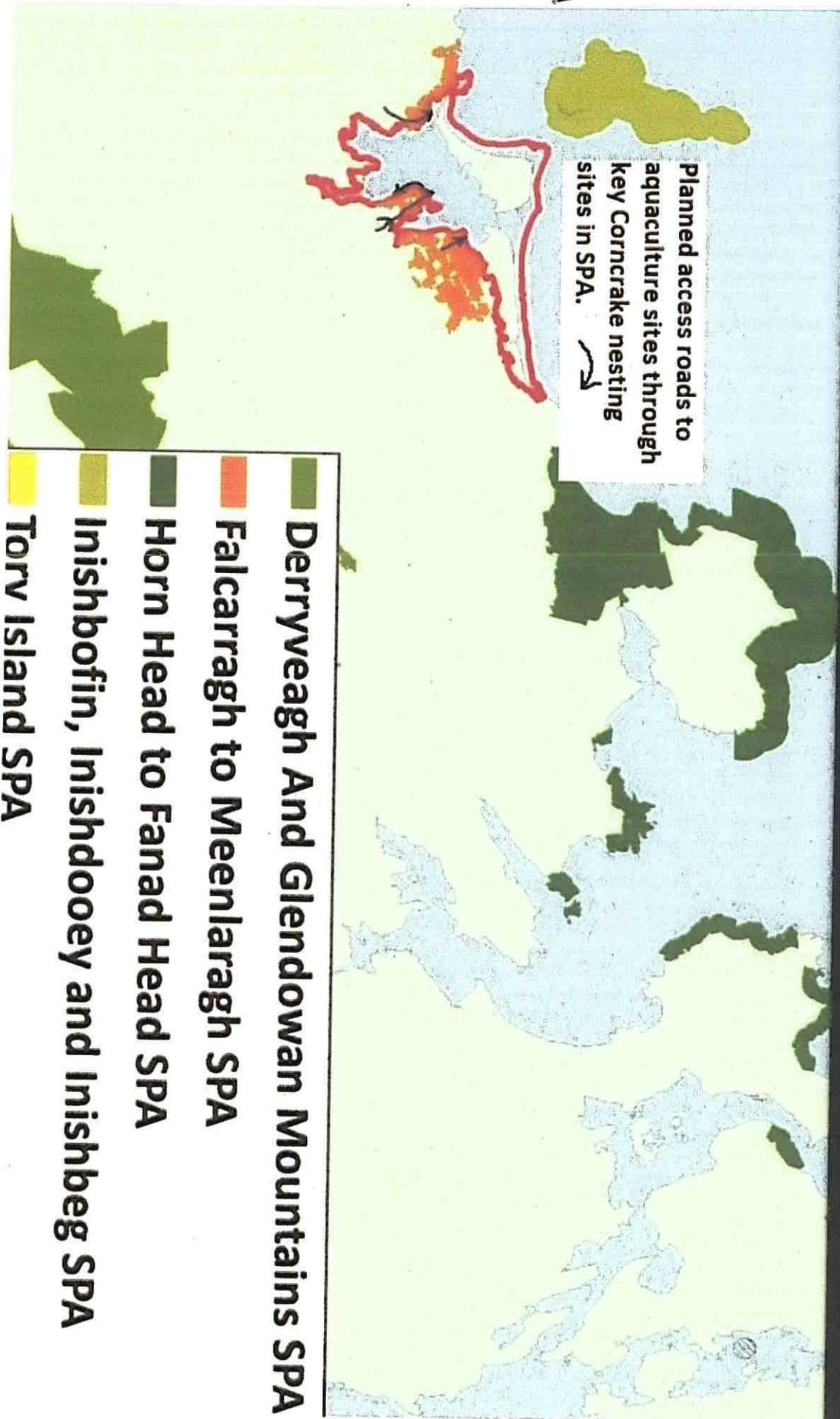
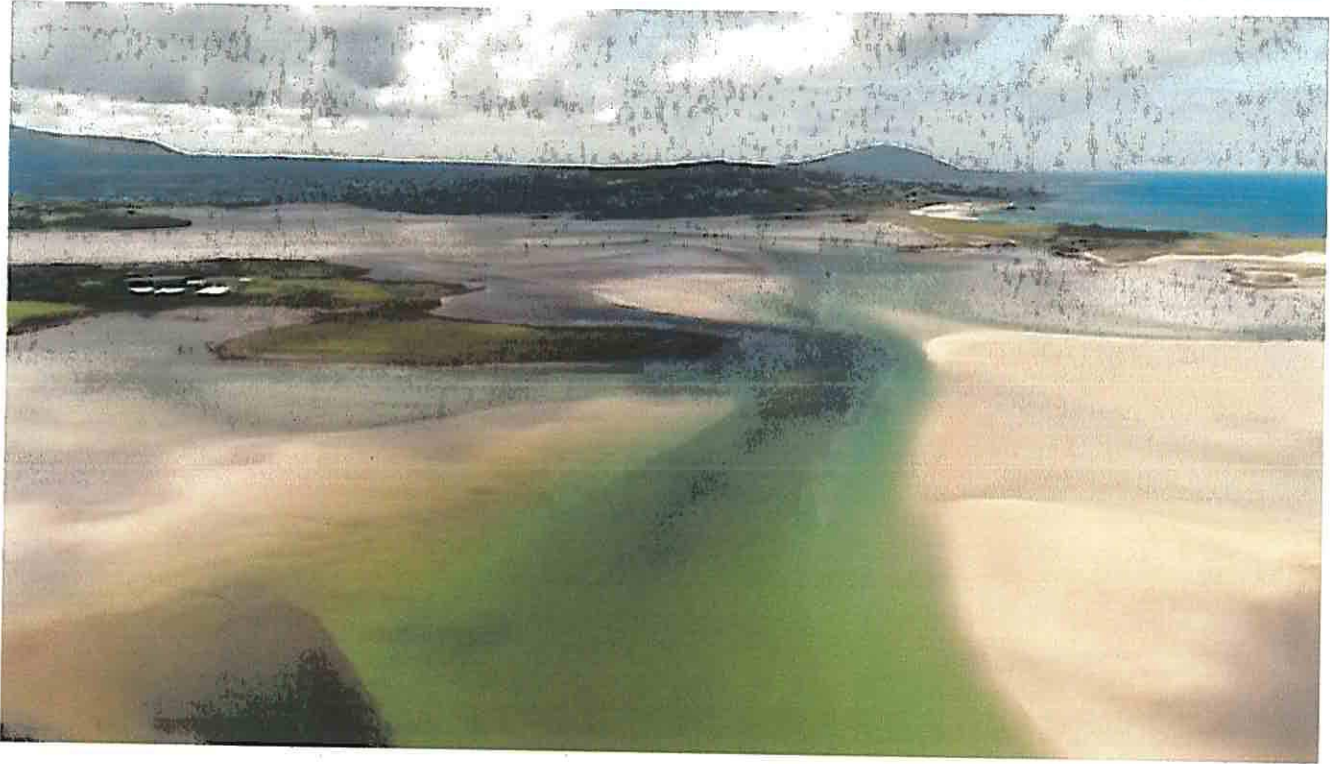


Fig 1A.

BALLYNESS WAY
WALKING GUIDE

BEALACH BHAILE AN EASA
EOLAÍ



*Réitithe ag
Coiste Glan agus Glas An Fhál Carraigh
Falcarragh Tidy Towns Committee
An Fál Carrach, Co Dhún na nGall*

BALLYNESS WAY

This is a short but spectacular beach walk on the Wild Atlantic Way coastal route at Falcarragh, County Donegal. The walking route presents breath-taking views to Tory Island and Horn Head with spectacular seascapes both winter and summer. This guide offers some information on the route, mainly in relation to local heritage and wildlife, that we hope will add to your enjoyment. It is divided into four short sections: **Heritage**; **Ballyness Bay**; **The Dunes**; **Drumnatinny Beach**. Links to other sites of interest are also included.



Proposed Site

HERITAGE

Ballyness is in the parish of Cloughaneely which lies between the Derryveagh mountains and the North Atlantic coast. It has a rich cultural heritage stretching back to its earliest inhabitants, the Formorians, the Milesians, the Tuatha Dé Danann and the Celts. The ancient Celtic language, Gaelic, is still spoken by the present day local inhabitants.

One of the mythical inhabitants of the area was Lugh, the God of Light. He had a forge in Drumnatiny beside this pier and his father Mac Aneely gave his name to the parish. Lugh's mother was Eithne, the daughter of the infamous Balor of-the-poison-eye who reigned in Tory. Lugh eventually killed his grandfather Balor and Lugh's sword of light was represented on the first stamps issued by Éire, the Irish Free State.

It was those first people who sailed into Ballyness five thousand years ago who built the mighty Wedge Tombs, Court Cairns and Dolmen that we see today at Ray, Ardsbeg, Keeldrum, Killult and Tory. These tombs were aligned with the sun to mark the four great seasonal festivals, Imbolg (spring), Bealtaine (summer), Lughnasa (autumn) and Samhain (winter). They also built fortifications and places of refuge such as Ring Forts, Rathes, Crannogs and Souterrains that are scattered throughout the parish. Indeed the fort of their war goddess Badbh is a mere 2km from here at what is now known as the Bawaan Pool at the mouth of the Tullaghobegly River. The Olphert gold hoard of broaches, pins and amulets uncovered in the sand dunes after a storm shows that they were skilled artists and metal workers.

The pier itself was built in 1848 as a famine relief scheme, workers being paid three pence a day along with a bowl of broth. During the famine two 'soup kitchens' operated in Falcarragh and hundreds left the parish across Droichead na nDeor (The Bridge of Tears) through Muckish Gap seeking a better life in Australia or America.

Bog ore and herring were exported from the pier in the past and coal and timber were imported. However passage in and out of the Bay was dangerous. In 1879 the Enterprise carrying ore foundered on a sand bar.

The sea you look on from the pier has witnessed many tragic events. Wolfe Tone's ship the Hoche was captured here after a six hour battle with British frigates. The Wasp, sailing to Inishtrahull with soldiers and bailiffs to collect rents, foundered off Tory and fifty were lost, some of whom are buried at St Ann's Church, Killult. On the 7th December 1940, the Stolwick sailing between Inishdoeey and Inishbeg struck rocks and sank. Just west of Tory, the Empress of Britain, the largest liner lost in World War 2, was torpedoed by U-Boat U32. During World War 2 convoys from America were often attacked by U-Boats in these offshore waters, and afterwards the strand would be littered with timber, sides of bacon and bags of flour.

Today the pier is used mostly for recreation. It is a good vantage point to view the birds and animals of the Bay, many of which are described below.

The history of the parish is written in its beautiful placenames. The meanings of many of the names can be found at <https://www.logainm.ie>.

The following sections briefly describe the main areas of your walk - the Bay, the Dunes and the Beach and what you may see.

BALLYNESS BAY



Mouth of Ballyness Bay

Ballyness Bay is a large inlet hemmed in by Dooley sand spit to the west and by the Drumnatinny dune system to the east. Tory Island can be seen through the mouth of the bay seven miles out at sea. Extensive sand flats are exposed in the bay at low tide and rocky shores occur in the inner part of the bay. The area is host to a great variety of animals and plants and attracts many species of birds and larger predators to the rich feeding.

Sand eels are abundant in the bay and they were traditionally harvested in the summer from the soft sands at low tide. They are a favourite food of the resident sea trout population and birds such as cormorants, shags, red-breasted mergansers and sandwich terns. Common seals are regularly seen from the pier hauled out at low tide on the sand bars.



Sponge exposed at low water



Periwinkles



Salmon Leaping - Tullaghobegly

A number of rivers and streams flow into the bay including Owenwillin, Owentully, Glenna, and the Tullaghobegly. At low tide the river channels are seen as ribbons of dark water stained brown by the bogs in their mountain catchments. A number of them still support runs of wild Atlantic Salmon, and in the past salmon were commercially fished at the pier using draft nets.



Sea Trout - Ballyness Bay



Common Seals - Ballyness Bay

Ballyness Bay supports over 40 different species of wader, wildfowl, seabird and birds of prey. Two uncommon diving birds can be seen on the waters of the bay. The Great Northern Diver is a winter visitor here and is known as the Loon in North America when in summer breeding plumage. The Red-throated Diver is also a winter visitor but Donegal also has a small rare breeding population. Some of the other waterfowl and waders that can be seen in the bay are pictured below.

In the surrounding fields you may also spot Choughs, a bird that is restricted to the western fringes of Europe. The Buzzard, a bird of prey that has expanded in Ireland in recent years, is also a regular hunter around these shores, often perching on fence posts or electricity poles. You may also hear the distinctive call of the corncrake (a regularly repeated creek creek), a bird threatened with global extinction that still has a stronghold in this area.



Red-throated Diver



Great Northern Diver



Red-breasted Merganser



Shelduck



Wigeon



Eider Duck



Barnacle Goose



Greenland White-fronted Goose



Pale Bellied Brent Goose



Great Black-backed Gull



Sandwich Tern



Black-headed Gull



Bar-tailed Godwit



Greenshank



Curlew



Redshank



Turnstone



Dunlin



Sanderling



Golden Plover



Grey Plover



Lapwing



Oyster Catcher



Ringed Plover



Chough



Buzzard



Corncrake



If you are lucky and observant you may spot otters foraging amongst the sea wrack to the south of the pier.

As you cross the strand from the pier to the dunes notice the thousands of small curly mounds of sand. These are the casts of lugworms as they burrow into the sand. Beside each mound is a hollow like a navel. This is the head end of the u-shaped lugworm tube. Lugworms are large marine worms that are often used as bait by sea anglers.



Lugworm Casts

THE DUNES



From the mouth of the bay a long ridge of dunes stretches east for 3km to the end of the route at the Ray River. The highest dunes line the back of the beach and act as a defence against stormy seas. Not many plants can live in this extreme environment with high levels of sea salt and constantly drifting sharp sand. These high shifting dunes are known as white dunes and are dominated by Marram Grass which is well adapted to the conditions with its needle like leaves that curl in as protection against the drying winds, and with deep wiry roots. The Marram Grass traps the moving sands, binds it with its strong roots and builds tall dunes.

Other plants that grow in the sand patches amongst the Marram include the bright yellow Ragwort, aromatic Thyme, Sea Spurge with its milky white toxic sap, Sea Sandwort with its fleshy neatly arranged leaves, the prickly Sea Holly and Creeping Thistle.



Creeping Thistle



Sea Holly



Ragwort



Sea Spurge



Thyme



Sea Sandwort



Sea Rocket



Common Birds-foot Trefoil



Pyramidal Orchid



Cat's Ear



Harebell



Coltsfoot



Eyebright



Wild Carrot



Common Vetch



Red Clover



Hare's Foot Clover



Wild Sand Pansy



Sea Bindweed



Lady's Bedstraw



Water Mint



Mouse-ear Hawkweed



Marram Grass



Grass of Parnassus



Devil's Bit Scabious



Yarrow



Biting Stonecrop

Inland from the white dunes are the sheltered fixed dunes, and dune hollows with wet areas. The fixed dunes support grassland with a rich variety of herbs. The beautiful Pyramidal Orchid grows profusely here and can be seen in flower from June to August. Lady's Bedstraw is common and produces small, but fragrant yellow flowers. Plants with large showy flowers include the Harebell with its powdery blue bells on delicate stems, the Sand Pansy which in its European distribution is particularly abundant in Ireland, and the lacy white umbels of Wild Carrot usually with a small cluster of red flowers at the centre of the umbel.

In the damper hollows you may find Water Mint with its unmistakable scent when crushed. Devil's Bit Scabious, the main food plant of the caterpillar of the rare Marsh Fritillary butterfly, also grows here. The Grass-of-Parnassus with its delicate white solitary flower and heart shaped leaves is easily identified. There are many other beautiful flowers to find among the dunes and some of them are shown above.



The skylark can be heard 50 to 100m overhead in spring and summer as it delivers a warbling song that may last half an hour. The wet dune hollows provide feeding habitat for Greenland White-fronted Geese and Barnacle Geese, and many waders and wildfowl roost in this area and often seek refuge from wild storms and gales here.

The Irish Hare, a species of mountain hare unique to Ireland, lives among the dunes. Unlike its European cousins the Irish Mountain Hare does not grow a white coat in winter. The hare is much larger than the rabbit which also occurs abundantly in the dunes. Unlike the rabbit which burrows into the dunes, the hare lives entirely above ground.

DRUMNATINNY BEACH



In front of the dunes is the wide expanse of Drumnatinny's beautiful white beach. From the beach there are panoramic views. Inishbofin, Inishdooley, Inishbeg and Tory islands lie to the northwest and to the northeast can be seen the towering cliffs of Horn Head.



Whales and dolphins are occasionally spotted off the beach. In 2014 a pod of pilot whales beached here and while many were re-floated through the efforts of locals, tragically a number died. Bottle nosed dolphins also pass the beach.



Out beyond the breakers rafts of Common Scoter ducks feed on shellfish in the shallow waters. If you walk the beach between September and April you may spot Sanderlings rushing in and out at the waves edge like little clockwork toys as they feed on small animals. Another beach resident is the Ringed Plover which breeds on suitable sandy or shingle areas of the beach.



As you near the Ray River at the eastern end of the beach you may see flocks of birds at the river mouth. Common Gulls, Herring Gulls, Great Black-backed Gulls, and Kittiwakes enjoy a bath and drink the freshwater. Grey seals occasionally patrol the river mouth when salmon are running. In the river you can spot small flounder skimming over the stones and a little further upstream you may see sea trout leaping in the pools.

As you approach the car park from May to August listen for the iconic call of the Corncrake, a shy, secretive bird that is now threatened with global extinction and only present in small numbers at a few locations in Ireland. The lush wet meadows along the river provide the habitat it needs. Ballyness Bay and surrounding areas are one of its last strongholds.

The description above covers only a small portion of the wonders to be seen in the parish of Cloughaneely. Some information is also available on the information boards at each end of the route and detailed additional information can be found on the subjects covered at the sites below:

BIRDS

<https://www.birdwatchireland.ie>

FLOWERS

<http://www.irishwildflowers.ie/>

<http://www.wildflowersofireland.net/>

WHALES AND DOLPHINS

<https://www.iwdg.ie/>

BALLYNESS BAY SPECIAL AREA OF CONSERVATION

<https://www.npws.ie/protected-sites/sac/001090>

Photograph Acknowledgments

Material presented which is not own work has been uploaded from Wikimedia Commons and is acknowledged as follows:

BIRDS

Wigeon, Laitche, CC : Eider, Magnus Hagdorn: Sandwich Tern, Ken Billington: Greenshank, Zeynel Cebeci: Greenland white-fronted goose, John B. : Great Northern Diver, Berichard: Red-throated diver, Omar Runólfsson: Sanderling, Jean-Jacques Boujot: Dunlin, Zeynel Cebeci: Turnstone, Donald Macauley: Oystercatcher, Richard Bartz: Grey plover, Frank Schulenburg: Golden plover, Wouter van der Ham: Lapwing, Andreas Trepte: Curlew, Redshank, Greenshank, Dr. Raju Kasambe: Bartailed godwit, Ian Kirk : Kittiwake, Andreas Trepte: Sandwich, MPP: Black headed gull, Arild Vågen: Red breasted merganser, Ron Knight: Corncrake, Rachel Davies: Buzzard, Jacob Spinks: Brent Goose, MPP: Greenland white-fronted goose, John B.: Barnacle goose, Dr. Raju Kasambe: Great black backed gull, Ringed Plover, Arnstein Rønning: Bar-tailed godwit, JJ Harrison: Golden plover, Kev Chapman:

PLANTS

Harebell, Isidre blanc: Sea Spurge, Eirian Evans: Sea bindweed, David Ouahnich: Thyme, Lis Burke: Sea rocket cakile, Krzysztof Ziarnek: Cats ear, Eclipse2009: Ladys bedstraw, Phil Sellens: Marrram, Jerzy Opiola: Grass of Parnassus, Rasbak: Devil's bit scabious, Anne Burgess: Mouse-ear Hawkweed, Udo Schmidt

ANIMALS

Irish Hare, AlanWolfe: Otter, Bernard Landgraf