

15th December 2017

Licence Application : T12/461A

Reference : AP6/1/2017



To whom it may concern,

In response to the appeal by the Carrickfin Trust Company LTD, Coiste Timpeallachta an Ghaoith and Colaiste Bhride Rann na Feirste, I would like to submit the following points for consideration by the Aquaculture Licences Appeals Board.

1. I am an active member of the local community who has approximately 15 years experience of working with oysters on the family oyster farm.
2. I applied for the licence as I currently live in Dublin and it was always my intention to move home to Donegal and settle in my local community.
3. When the applications for oyster licenses opened up in 2011, I decided to seek an application for a small oyster farm. My application for 2.8311 hectares is the minimum site size that could sustain an oyster farm.
4. I have a detailed plan of how I intent to work my oyster farm. This includes the following:
 - All trestles to be purchased and made locally.
 - A farm which can cater for up to a maximum of 1,000,000 seed annually. The seed I intend to buy will be 6mm.
 - All oyster seed will come to the farm from the hatchery and will remain on the farm until ready for market.
 - When oysters are ready for market, they will be sold on to a local exporter, thus helping keep employment local.
 - I aim to create 2 part-time jobs along with myself when the farm is fully operational. I aim to employ local students who are on summer holidays and who play for the local GAA club, thus keeping students at home during the summer months.
5. I have good experience of working with oysters having worked on the family farm for many years. I am aware of good practise and of the importance of protecting and respecting the environment. I will continue to learn about good practice re. oyster farming and keep up to date with any new practice that is recommended by the Marine Institute.
6. I am committed to the long term sustainability of oyster farming in our local bay and am fully aware of how important the industry is on a clean environment.

7. I have no intention of packing or storing shellfish prior to transportation. I will be selling my oyster direct in the oyster bags that they are growing in to a local exporter.
8. I am at a loss as to why lack of packing and storing facilities was entered in the appeal grounds as all the points relate directly to fish and is not relevant to shellfish .
9. My application was made years ago, it is now only being examined. We have used the same road for 13 years and have never had a prior objection.
10. The appellants highlighted a research carried out by the Marine Institute, Gittings, T.& O'Donoghue, P.D. (2012, p vi) into the effects of oyster farming on marine and aquatic birds, they only highlighted the birds that had a negative behavioural response, the research theorised that the oyster trestles interfere with their flocking behaviour by making it difficult for individuals in large flocks to remain in contact as they become dispersed across several lines of trestles.
11. The same research highlighted that a large number of bird species demonstrated a neutral/positive response, these birds were all waders that tend to feed in small flocks (Turnstone) or as widely dispersed individuals/loose flocks (Oystercatcher, Curlew, Greenshank and Redshank). The study also highlighted the species that had a variable response, dependent on site, these species were Light-bellied Brent Goose, Black-headed Gull, Common Gull and Herring Gull. These birds would be indigenous to the local area.

My application is for 5% of the total area under appeal. I am prepared to invest money in my farm and hope for long-term sustainability working in the local community.

I ask you to give due consideration to my submission and look forward to hearing from you.

Yours faithfully,



Brendan Boyle