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Ann McCarthy
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Department of Agriculture Food and the Marine
National Seafood Centre
Clonakilty
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P85 TX47

Dear Ann McCarthy,

Ref: T03/96

I refer to my aquaculture application in Bannow Bay and I would like to make the following comment as a reply to the results of the public and statutory consultation stage of the 1st of June 2018.

Comment 1 : in reference to the response from the Foreshore EPA

From the reply sent by the Foreshore EPA, point 1) it seems that the licence T03/96 doesn't appear to have been covered in the Appropriate Assessment. I have not been informed of such matter and could you please give me confirmation. My application date of March 2016, it should have been covered in the Appropriate Assessment otherwise I would have been informed.

Could you please clarify this matter and inform us what the next step for an Appropriate Assessment to be carried out please ?

Comment 2 : in reference to the response from the Foreshore EPA

Point 2) state : conclusion statement with the above license application state in the mitigation measures and management action that " ...on the basis of the appropriate assessment finding is not proposed to licence any new aquaculture activity in Bannow Bay..."

My question is how mitigation measure and management action can be decided when no appropriate Assessment have been carried out at first ? (with reference to my first comment)

Comment 3 : in reference to the response from the Environmental section

Point 3) : " the proposed shellfish area...was discovered to host Zostrea species" .

My reply to this concern is that Zostrea bed can be delimited and protected within the 20 Ha of the proposed license area. From previous site observation, Zostrea beds do not cover large area of the proposed aquaculture license. Protective measures will be put in place, such as surveying, monitoring, mapping and marking of Zostrea beds with the aquaculture site. No trestles/ access will be carried out where Zostrea bed are monitored using GPS and a marine biologist or environmental scientist.

Comment 4 : in reference to the response from the Environmental section

Point 2) It is not uncommon to have aquaculture sites anchoring on navigation areas. There is lot of place for anchoring in Bannow Bay and the surface of the license is small in comparison to the all free anchoring area available. Also, there is no history of much navigation or anchorage activity within the proposed area.

Point 4) What type of study should be carried out for the site access ?

Point 5) Should this point refers back to my first comment ?



Comment 5 : in reference to the response from the SWC

In regards to impact on birds population, most of the bird foraging area in Bannow Bay is located at the Mud flat in the Upper Estuary and at a much lesser extend at the site location.

It has been actually proved that shellfish farms are having a positive impact on coastal environments, considerably reducing risks of costal Eutrophication. Oysters are filter feeders and thus regulating efficiently the uncontrolled development of the primary production enhanced by excess of nutrients from urban pollution. Excess in primary production in Bay would reduce light penetration in the water column and then excess in nutrients would then promote the growth of large mats of green macro-algae (i.e. sea lettuce) which is further blockage of light and oxygen beneath it. Coastal Eutrophication would considerably reducing biodiversity, food availability and access for birds and it would negatively impact on Zostrea beds.

Also, it is noticeable that bay where intense aquaculture have been developed such as Arcachon, in France are also the cradle for the largest migratory bird populations in Europe. Oyster farming is a green activity, having very positive ecological impact. It is also noticeable that shell produced by shellfish have a positive carbon sink effect in the oceans and trestles provide nursery and support multiple life such as a recite of a wreck.

Comment 6 : in reference to the response from the harbour master

It is proposed to clearly mark the access channel (boundaries and location to be delimited with harbour Master). The proposed site is big enough (20 ha) to clearly mark a large and safe passage for navigation and pier access. It is in my opinion that there should be enough free space in Bannow bay to grant access safely to various activities. Further talk and recommendation with the harbour master would be required to discuss the matter.

I would appreciate is you could clarify some points in my comments. Please feel free to contact me for further explanation of discuss some issues I may have not understood.
Could you also please inform me about the next step in the application process?

Best Regards
Adrien Geay.

Date : 19 June 2018