



16-05-2018

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Aquaculture & Foreshore Management Division,
National Seafood Centre, Clonakilty,
Co. Cork
P85 TX47,
By Email: Therese.OKeeffe@agriculture.gov.ie

RE: Aquaculture and Foreshore Application for Ballymacoda Bay, Co. Cork, Site Refs; T05/395, T05/482A, T05/491A, T05/482B, T05/517 A&B, T05/545, T05/575 & T05/595

Dear Therese,

IFI would like to make the following observations in relation to statutory consultation regarding Ballymacoda Bay Aquaculture.

IFI has noted that there may be the potential for the obstruction of fish migration or direct interference with a pre-existing recreational angling resource or commercial fisheries.

IFI would consider the former issue not to be relevant with respect the Munster Blackwater (MBW) given the location is well removed from Youghal harbour, where the MBW enters the sea. However the adjacent Womanagh river catchment holds salmon and possibly sea trout and it is noted that a number the proposed sites lie in close proximity to the rivers outfall into the open estuary. The Womanagh, which is classified as a salmon river, discharges into Ballymacoda Bay (Map 1 below). Expanding this aquaculture production site may pose a physical impediment to both ascending and descending salmonids from the Womanagh River at critical times. These include the smolt run window in April and May, and the periods when adult salmon are returning to freshwater to spawn. The Womanagh is not regarded as a salmon angling river but is essentially a salmon production unit and is one of approximately 150 salmon rivers reported by IFI to NPWS under Article 17 of the EU Habitats Directive. Juvenile salmon presence is confirmed by regular electrofishing conducted twice in every 6 year Article 17 reporting cycle.



The potential for fish impedance under certain water conditions needs to be considered. Increased risk of predation facilitated by the presence of new infrastructure may be an issue. Mitigation may require that the existing course of the river into the bay should be maintained free of any impediment/infrastructure.

The site lies between Youghal Bay and Cork Harbour which has commercial fisheries and also a number of recreational shore angling marks particularly for bass fishing. Dunlop (200x) identifies seven shore angling marks in or around this site (See Appendix 1 below).

Various species are available and a bait digging site is identified. Some small boat angling is also available in the area. Angling with bait (i.e. bottom fishing from the shore or small boat) is likely to be curtailed due the risk of fouling oyster trestles.

Because of its physical characteristics the Womanagh estuary was identified by IFI staff as a potential juvenile bass nursery area. However, subsequent surveys undertaken by IFI and Fahy yielded few juvenile bass. More recently surveys undertaken by IFI in 2013-2015 have recorded small numbers of juvenile bass.

If a licence is to be granted in this location IFI would like see the following issues addressed in the licence:

- That the location is clearly marked on the boundaries by appropriate buoys / or navigational markers if required;
- That any stock used is from certified disease free stock;
- That the location chosen does not conflict with any fishing locations either for recreational sea angling boats or commercial fishermen;
- That no non-native species be used;
- That proper biosecurity protocols are followed during the operations of the farm to ensure no diseases or non-native species are introduced or spread elsewhere from the facility should one arise.

Regards,

Dr Greg Forde

Head of Operations



Figure 1 – Map of Ballymacoda Bay

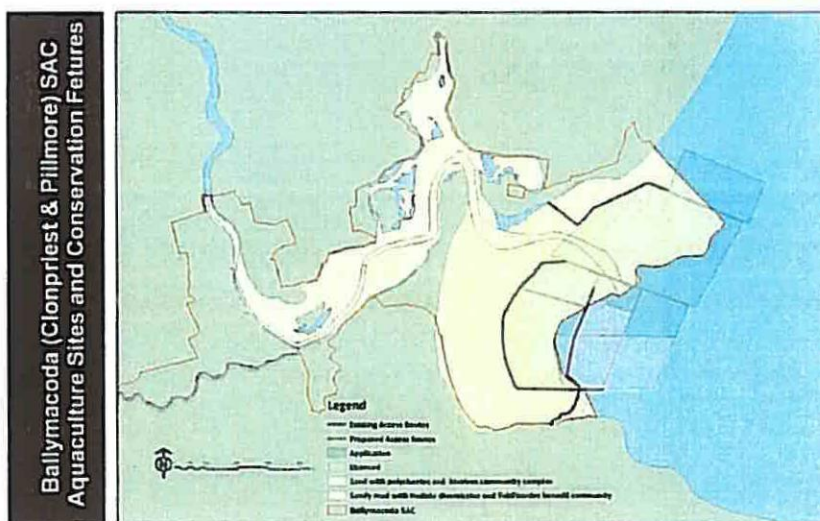
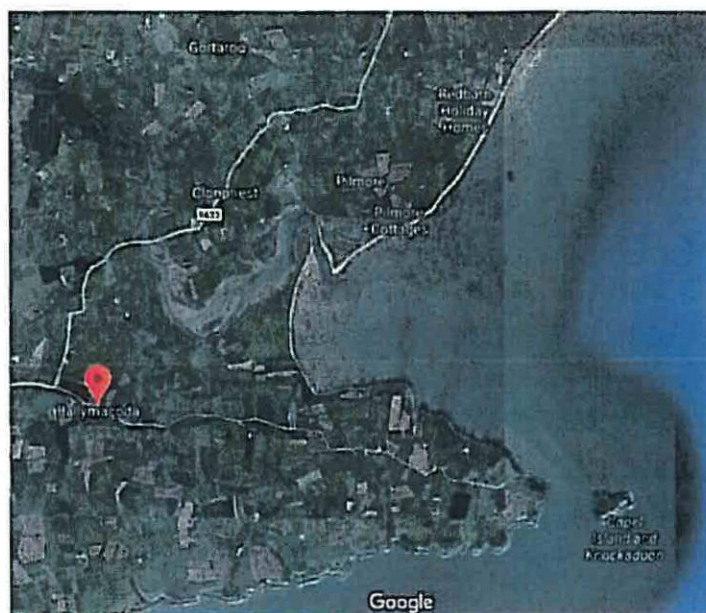
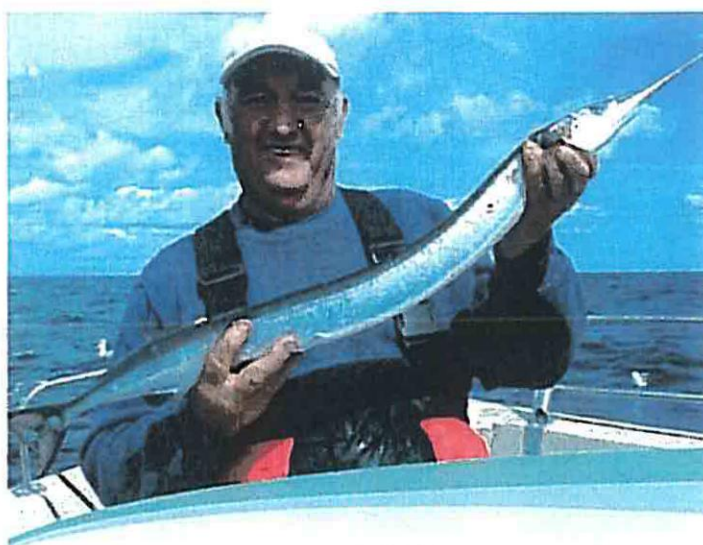


Figure 3.1 – Aquaculture sites (existing and proposed) and access routes (existing and proposed) relative to the marine community types recorded within the marine Annex I Qualifying Interest (QI) SAC (Ballymacoda & Pillmore) SAC (NPHS 2015a)



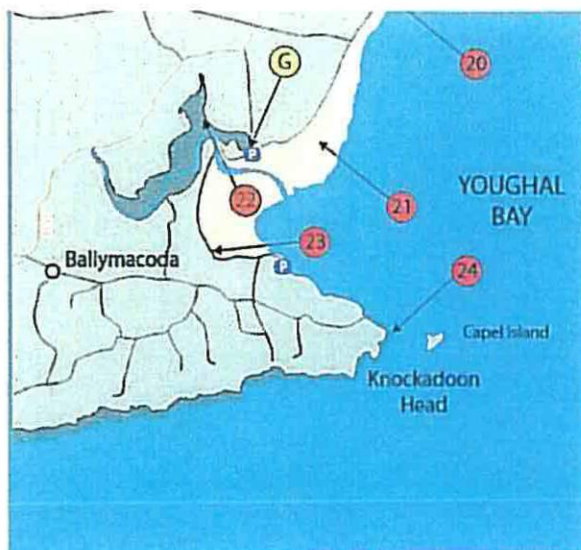
Appendix 1 – Extract from



**A GUIDE TO
SEA ANGLING
IN THE
SOUTHERN FISHERIES REGION
by
Norman Dunlop**

Produced by the Central Fisheries Board for and on behalf of the Southern Regional Fisheries Board.
Distributed by the Southern Regional Fisheries Board. Available from: Fisheries Ireland, 100, Tinnahilly.

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The 5km long, south east facing Youghal or Redbarn Strand (20) is a popular, shore fishing and tournament stretch which features a number of events every year. This is also a favoured beach with day trippers and tourists so fishing is mainly restricted to off peak holiday periods or on night tides when relative peace and tranquillity prevail. The beach is best fished on a flood tide and catches tend to peak when the water is well aerated by a rolling surf. Bass and flounder are the main quarry but match anglers enjoy the annual inshore migration of coalfish from October to December. Crab and lugworm are the most popular baits there.

At Pillmore Strand (21) on the northern side of the entrance to the Womanagh River estuary, a flooding tide will yield bass, flounder and occasional plaice, with codling showing in winter. Spinning in the channel will also occasionally result in seatrout. Below the Pillmore Car Park (G) lugworm are plentiful on the channel banks and can be dug easily.

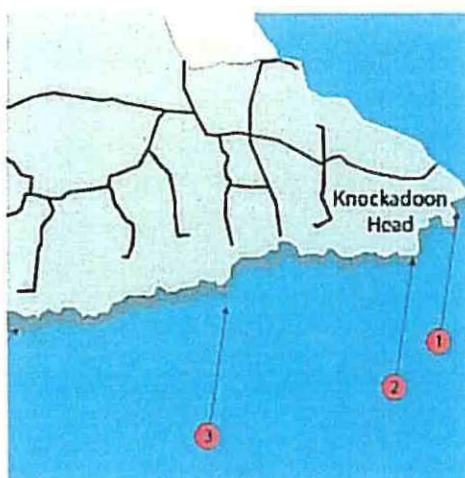
Inside Pillmore Estuary (22) below the R633 road, spinning in the channel on a flood tide will produce bass and seatrout. Bass to 4.5kg and flounder to 1.40kg will also fall to bottom fished crab baits. Spring tides can be difficult to fish at Pillmore due to the inordinate amount of floating weed that is carried along with them. This can be very frustrating as cast after cast is swept away up tide by heavy clumps of weed which engulf the terminal tackle on every cast. This can also lead to high losses of tackle, so tides like this should be avoided. On the southern side of the estuary at Ballymacoda (23), bass and flatfish arrive for a short period of an hour or so around high water and can be caught on crab or worm baits. Night tides are generally best there. About 5km east of Ballymacoda village is Knockadoon Pier (24) where spinning at high tide is successful for pollack and mackerel (in season). Float fishing produces mullet but prior ground baiting will afford best chances of success.

Dogfish, ballan and corkwing wrasse are also common around the pier as are a whole community of mini species including tompot blenny and black goby.

Small boat fishing locally around Capel Island is for codling, wrasse, pollack, conger, coalfish, with baited feather lures offering best opportunities.

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Chapter 4, Map 4

Knockadoon Head to Ballycotton

There is a track across the headland that leads down to the fishing mark on **Knockadoon Head (1)** where there is spinning and float fishing for pollack, wrasse, mackerel and mullet. Bottom fishing will yield conger and rockling.

On the southern corner of Knockadoon Head a narrow road runs towards an **Old Signal Tower (2)**. The ground below the tower is of weed and rock, interspersed by a number of sandy patches, over which spinning and float fishing can be carried out for pollack, mackerel and wrasse. Bottom fishing will produce conger, cod and coalfish.

The rocks at **Ballymakeragh (3)**, particularly on the eastern side of the small headland, offer several productive vantage points for wrasse, dogfish, rockling and bass in summer. Codling and coalfish can also be taken there in late autumn. The best baits are crab, lugworm, mackerel and squid.