

## **OKeeffe, Therese**

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**From:** Foreshore EPA Marine [fem.dau@chg.gov.ie]  
**Sent:** 30 May 2018 14:19  
**To:** Aquaculturelicensing  
**Subject:** Aquaculture Licences T05/395, T05/482A, T05/491A, T05/482B, T05/517 A&B, T05/545, T05/575 & T05/595  
**Attachments:** ATT00001.txt; ATT00002.htm

**RE: Aquaculture Licences T05/395, T05/482A, T05/491A, T05/482B, T05/517 A&B, T05/545, T05/575 & T05/595 at Ballymacoda Bay, Co. Cork.**

A chara,

Please find the nature conservation recommendations of the Department of Culture, Heritage, and the Gaeltacht for the above mentioned application.

The Department of Culture, Heritage and the Gaeltacht welcomes the opportunity to provide observations concerning the licensing of the aquaculture activities for the sites, namely T05/395, T05/482A, T05/491A, T05/482B, T05/517 A&B, T05/545, T05/575 & T05/595 (Licence Code) at Ballymacoda Bay SPA (Site Code: 004023) and Ballymacoda (Clonpriest & Pillmore) SAC (Site Code: 000077).

The Department acknowledges the recommendation that new applications not be licensed given the likely impact on the conservation objectives for several species at this SPA. It offers the following comments and it is hoped that these will be considered by the Department of Agriculture, Food and the Marine in its decision-making process.

The potential of renewal applications to cause significant adverse impacts to two of the listed waterbird species, Sanderling and Back-tailed Godwit is highlighted by in the Appropriate Assessment report and the draft Appropriate Conclusion Statement. The draft Appropriate Conclusion Statement then infers that the renewal of these licences will not adversely affect the conservation objectives targets for these species because one of the two attribute targets (population trend) for both species is currently considered to be favourable. However, both conservation objective attributes (population trends and distribution) need to be considered in tandem in order to ascertain favourable condition.

While the Department accepts the mitigation measures as outlined in the draft Conclusion Statement, including the review of monitoring outputs, it would like to highlight the following:

- 1) The analysis used to estimate potential displacement is based on the recorded distribution of birds when the current aquaculture enterprises were already in-situ and therefore, the on-going displacement effect on several waterbird species is included in this.
- 2) The Department is unaware of any detailed findings of the proposed 'licence and monitor approach' having been published by DAFM and therefore the efficacy of this process is unknown.
- 3) As above, the Department has no knowledge of any detailed findings on the effectiveness of the mitigation measures that are routinely appended to aquaculture licences, thus it is difficult to comment constructively on these.

The 2008 NPWS conservation objectives supporting document includes information on the distributions of waterbirds in relation to the current aquaculture development at this SPA. This report may be of assistance in evaluating potential and actual levels of on-going displacement of certain waterbird species caused by in situ aquaculture developments.

Mise le meas,

Connor Rooney

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An Roinn  
Cultúir, Oidhreacht agus Gaeltachta  

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Department of  
Culture, Heritage and the Gaeltacht