

## Submissions – Public Consultation

### Submission 1 – Irish Islands Marine Resource Organisation (IIMRO)

I am writing in response to the public consultation on the harvesting of seaweed by Oilean Glas Teoranta in Co. Donegal on behalf of The Irish Islands Marine Resource Organisation ([www.iimro.org](http://www.iimro.org)), which represents islanders on the offshore islands of Donegal, Mayo, Galway and Cork.

IIMRO are opposed to the granting of foreshore licenses to Oilean Glas Teoranta for the harvesting of seaweed on the offshore islands for the following reasons:

- Traditional, sustainable seaweed harvesting rights exist on all of the offshore islands. I am attaching an extract of a document which formalised seaweed rights assigned to each holding on Arranmore Island, Co. Donegal which was documented during the sale of the island to the Land Commission in 1902. You will note that the attached pages refer to the area on Arranmore Island which is the subject of the foreshore application by Oilean Glas Teoranta.
- The National Marine Planning Framework (NMPF) process is currently underway with implementation due this year. The NMPF (National Marine Planning Framework Baseline Report) acknowledges:

*18.7 The Property Registration Authority of Ireland (PRAI) has identified that certain rights exist relating to seaweed, particularly along the western seaboard.*

*“18.17 Any sector engaged in or planning to engage in activity that could affect seaweed harvesting rights in an area should engage in consultation with the rights holders in advance of any works taking place.”*

This has not occurred and there has been no engagement with local island communities by Oilean Glas Teoranta.
- Legal advice from the Office of the Attorney General has confirmed that where an individual right to harvest seaweed exists a licence under the 1933 Foreshore Act is not required by the holder of that right in order to harvest seaweed.
- Seaweed gathering and sea plant collecting and processing are activities with a complex skill set and example of intangible cultural heritage which has been preserved on the islands. Knowledge of the curative properties of seaweed, their food value and the industrial value of Kelp production were expected on the offshore islands. The importance of the intertidal space, which is neither land nor sea (often revealed through sea mist), finds cultural expression through the folklore and mythology of Irish Islands and many of the Islands origin myths reflect this. To survive on the sea shore in the past, an intimate knowledge of tides and their seasonal variations was essential for safety, for food, for industry and for ritual practice. The traditional exploitation of the intertidal zone is predicated on this knowledge;

the use of seaweed for food, medicine and on island farms for soil conditioning, fertiliser and animal fodder to the present day reflects this.

- IIMRO are objecting to the application Oilean Glas Teoranta for foreshore rights and request that the department comply with all EU and national legislation including the forthcoming Marine Strategy Framework Directive, National Marine Planning Framework and Marine Protected Area processes when considering this application.

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**Submission 2 – Thomas Pringle T.D., Cllr Micheal Cholm MacGiollaEaspuig**

CONSULTATION ON POSSIBLE SEAWEED HARVESTING RIGHTS IN RESPECT OF AN APPLICATION FOR A FORESHORE LICENCE TO HARVEST WILD SEAWEED.

Notice is hereby given pursuant to Section 19 of the Foreshore Act 1933 that Oilean Glas Teoranta (OGT), Kilcar, Co Donegal has applied to the Minister for Housing, Local Government and Heritage for a licence under Section 3 of the said act to harvest wild seaweed at Rutland Island and Sound, Mulroy Bay and Trawbreaga Bay, Co. Donegal.

A Chara,

We the undersigned wish to make a submission in relation to the application by OGT, Kilcar, Co. Donegal for a license to harvest seaweed on numerous locations along the coast in Donegal. We would like the following points to be considered in making the decision.

This application was made originally in 2013. All documents and reports seem to be originating from that time. Surely things have moved on since then and for seven-year-old documents to be used in the decision-making process is hardly adequate. It is now 2021 and the application is being adjudicated on so at the very least the all documentation should be updated to account for the changed environment.

Existing rights of turbary must be respected and how is this license application impacting on that? It is not clear from the application form how they are being respected and it is possible that this application could impact on existing folio rights.

It should be noted that in a written answer to question 589 (21 Jan 2019) in the Dáil, the Minister replied that

‘...[Applicants] will need to identify the folios of all land bordering that part of the foreshore and, with the exception of urban land and housing estates, within one mile of the foreshore in question. It will be necessary to examine all such folios to ascertain if they contain any entries showing a right to take seaweed from that part of the foreshore.’

I assume implicit in that is that they will need the permission of each folio owner and that they should be included with the application which is not obvious from the documents provided. In fairness this issue arose since the date of the application and the applicant should be required to

show that this has been respected. This highlights the fact of the age of the application and the need for it to be updated prior to decision making.

I trust that this submission will be taken into account in making the decision on whether or not to grant the application and that we will be informed of the decision.

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### **Submission 3 – Donegal Seaweed**

Our company, Donegal Seaweed, object to the recent application by Oilean Glas Teoranta to harvest seaweed from Rutland Sound, Mulroy bay and Trawbreaga bay all located within County Donegal. Our company, located at Unit 2, Meemnore Dungloe Co. Donegal produce and export organic seaweed liquid fertilizer.

Oilean Glas Teoranta is owned by a spanish Corporation (Tradecorp Inc) with a global reach, which is a subsidiary of a separate global trading corporation Rovensa based in Portugal. It increases my concerns that if successful, it would create a monopoly position and have a major impact on our business which will result in the loss of jobs.

The harvesting volumes proposed will have a disastrous impact on the regenerative ability of the beds to thrive and can in no way coincide with our careful rotation and selection policy in our harvesting areas thus allowing strict sustainable management of our seaweed stocks.

In this way we can protect the marine environment for future generations. It is of the utmost importance to our company that we diligently and rigorously maintain a positive sustainability and traceability program.

A similar proposal in the south of the county resulted in the minister for housing, planning, and local Government having to intervene and take a more respectful approach to stop these global giants creating a monopoly in our country. When presented with a parliamentary Question 589 21st Jan 2019 he responded with the following, Applicants will need to identify the folios of all land bordering that part of the foreshore and, except for urban land and housing estates, within one mile of the foreshore in question. It will be necessary to examine all such folios to ascertain if they contain any entries showing a right to take seaweed from that part of the foreshore. This is clearly not the case with this application.

I hope this objection will be seen as genuine reason to safeguard our company, so that we can have the confidence to re-invest going forward.

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### **Submission 4**

Further to the consultation by Oilean Glas Teoranta to harvest seaweed from Rutland Sound, Mulroy bay and Trawbreaga bay all located within County Donegal.

I object to the application on the following grounds:

- The sheer volumes for which they are applying will ultimately result in them needing to use mechanical harvesting methods which risks decimating the pristine environment contrary to the sustainable methods currently employed
- The harvesting volumes proposed will have a deleterious impact on the regenerative ability of the beds especially on top of the harvest taken by existing (by hand) harvesters.
- The beds cannot be viewed in isolation. The body of marine life reliant on the beds will clearly be adversely impacted
- The blanket almost County wide coverage of the proposal which would seemingly underpin a monopoly position and potentially undermine the livelihoods of extant local businesses and individuals.

It should be noted that in a written answer to question 589 (21 Jan 2019) in the Dáil, the Minister replied that

‘...[Applicants] will need to identify the folios of all land bordering that part of the foreshore and, with the exception of urban land and housing estates, within one mile of the foreshore in question. It will be necessary to examine all such folios to ascertain if they contain any entries showing a right to take seaweed from that part of the foreshore.’

I assume implicit in that is that they will need the permission of each folio owner. Unless such permission has been sought and granted I believe that the application should be rejected

That this company is a wholly owned subsidiary of a Spanish Corporation (Tradecorps Inc) with a Global reach according to their web site, which in itself is a subsidiary of a separate Global trading Corporation based in Portugal (Rovensa) increases my concerns that if successful, they will place profits well before local people and the precious local environment.