

CONNEMARA ORGANIC SEAWEEDS  
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*Response to Public submissions*

**File Reference No:** MS 51/12/629

**Application:** Mechanical Harvesting of seaweed- North Galway Bay and Bertraghbui Bay

**Applicant:** Connemara Organic Seaweeds

**Submissions:**

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|-------------------|------------|
| 1. Arranmara Ltd. | 24/01/2013 |
| 2. An Taisce      | 24/01/2013 |
| 3. Martin Keaney  | 11/01/2013 |
| 4. Michael Gorham | 11/01/2013 |
| 5. Sean Gorham    | 18/01/2013 |

**Arranmara Ltd**

1. There is no proposal to interfere with or restrict traditional seaweed harvesters working on the intertidal zone. The proposal is to harvest Laminariales; no harvesting will be carried out in the intertidal zone where *Ascophyllum nodosum* harvesting is carried out. There are limited quantities of the target species in the intertidal zone and it not practical or economical to attempt to operate a harvesting vessel in such shallow areas. Existing manual harvesters shall not be displaced by the proposal and there shall be no attempts to stop or curtail their activities in any way whatsoever. From an administrative perspective the upper limit of mechanical harvesting activities will be the *mean low water mark* or the *lowest astronomical tide*. In practise it is likely that the limit of harvesting activities shall be significantly deeper and further removed from the shoreline than the mean low water mark. The upper limits of harvesting activities are likely to be determined by the distribution of the target species and the practical depth within which the vessel can operate. No attempt shall be made to harvest *Ascophyllum nodosum* or other species above the *mean low water mark* during periods of high water such as spring tides.

2. The target resource lies below the area in which manual harvesting is possible. Manual harvesting is conducted in the intertidal zone and only as far as tidal condition permit on a day to day basis. Connemara Organic Seaweed (COS) has already outlined the limits of their harvesting activities. It is predicted that there shall be no competition with manual harvesting activities as they are practised at present. Regarding issues of competition further along the supply chain, COS do not intend to enter into competition with Arramara Teo. In terms of choice of raw material, product output, scale of operation or the targeting of market segments etc. furthermore, there would be no justification for DOELG in blocking the proposed development by COS on the basis of Arramara Teo. wishing to enjoy an unfettered monopoly on a state owned natural resource, particularly when Arramara Teo. appear to be concentrating their efforts on a completely different target species namely *A. nodosum*.
3. Connemara Organic Seaweeds wishes to clarify that it will engage in sustainable mechanical harvesting only. The company has no intention to carry out hand cutting of seaweed activity.
4. The target species in the proposal are exclusively Laminariales, *Laminaria digitata* shall be the primary target species. It is predicted that harvesting activity will result in a variety of seaweeds being harvested including; *Laminaria digitata*, *Laminaria hyperborea*, *Saccharina latissima*, *Sacchoriza polyschides*, and *Alaria esculenta*. The variety of material being landed may result from the natural distribution of Laminariales, the seasonal variation in populations (e.g. *A. esculenta*) localized variation caused by benthic topography, exposure and wave action, and the selectivity of the extraction gear employed. Regarding the issue of nomenclature, the term *kelp* is used in the text application because it a commonly used term with which to describe Laminariales. In the context of this application the term *kelp* does not mean *A. nodosum* which is also, incorrectly, referred to as kelp in a number of regions along the Irish coast.
5. COS are a recently established company, however the directors have been long involved in the marine commercial sector in Ireland and in the Connemara region. COS are confident that the company has a highly experienced management team with exceptional competencies in the areas of marine based commerce, business development and management, environmental monitoring and marine and vessel health and safety. The company is also confident that they have access to first rate support in the areas of new product development, marketing and sales and overseas market development. COS are confident that they have adequate resources and access to further resources to develop the proposed develop and the processing and transformation activities which shall develop later.

The Director of Connemara Organic Seaweeds has himself cut seaweed on his own family cutting rights area and his family was involved for 40 years in the transport of seaweed to 5 different seaweed processing stations in Galway, Mayo and Co. Clare including dry and wet seaweeds kelp and sea rods

In terms of raw material processing, COS have taken onboard important lessons from Ireland, France and Norway, specifically, that in any attempt to base an enterprise on seaweed processing, proximity to the natural resource is a key factor in determining the success of the enterprise. COS have sought to identify an area with appropriate harvestable biomass and are now in the process of obtaining permission to harvest a sustainable proportion of the biomass. COS believe that investment in facilities etc. in advance of biomass studies and a licence to extract seaweed would have been an unacceptable risk.

The experience in Norway and France illustrates that facilities located remote from appropriate supplies of raw material have to contend with high road transport costs and raw material quality issues, all of which damages commercial viability.

The company's intention is to secure raw material access in advance of making any significant investment in processing capability. The directors believe that there are a number of suitable industrial sites in close proximity to the proposed harvesting sites which could be acquired if a licence is granted by DOELG, and COS do have plans for processing of seaweed raw material.

6. COS have not stated any tonnage in their application to DOELG, the rationale behind this is that there is no way of establishing a scientifically credible harvesting target or quota in advance of carrying out a biomass estimate. COS believe, based on studies by Werner and Kraan (2004), Laminarian density studies by Aquafact (1996) and a review by NPWS of "The Role of Kelp in the Marine Environment (2005) from the west coast of Ireland that there are significant Laminaria resources in the area.

The cost of a biomass study is very significant. COS are seeking to obtain permission to harvest a sustainable proportion of biomass estimate to be carried out by a credible marine environmental contractor e.g. Aquafact. Our approach is to secure approval in principle and then to be guided by the biomass estimate and ultimately by the conditions set down by DOELG. COS do not wish to inadvertently apply for inappropriate tonnage in advance of a biomass study and to then find our application rejected by DOELG on the basis of our seeking inappropriate tonnage.

#### **An Taisce:**

An Taisce concerns about the proposal being carried out in a sustainable and balanced manner has been considered in the Aquafact study proposal accompanying this application. An initial baseline study is proposed and a 5 year rotation system with an ongoing monitoring programme is suggested. A suitable control site has also been suggested as part of the monitoring programme.

COS have a clear and genuine interest in the environment and the sustainability of this project. As part of the environmental studies it has undertaken to review the findings on an ongoing basis and after year 1 post harvest will reassess baseline and review its operations in the light of the findings.

**Martin Keaney / Michael Gorham / Sean Gorham:**

Both of these submissions have a similar view and are mainly concerned about adverse effects on the environment. As mentioned in the previous response COS want to promote this study in an environmental sustainable and balanced way. To this end they have submitted a detailed environmental baseline and monitoring programme in order to ensure these goals. Furthermore, the main promoters family has had seaweed harvest rights in Connemara going back generations and does not want to see harvesting rights of any individual impinged on by his or COS activity.

Harvesting by Connemara Organic Seaweeds should not impact on harvesting of storm kelp as storm kelp can be deposited on beaches and land from a wide area and proximity resource may not necessarily be the source of the storm cast. The quantity of kelp being harvested should be not impact on cast kelp. The director of Connemara Organic Seaweeds has cut seaweed on his own family's seaweed rights area in the past and is aware of the sensitivity involved and would not like to impact on any other person's seaweed rights.



Noel Lee