

Dr Kieran Guinan Chief Research Bioanalyst BioAtlantis Ltd. Kerry Technology Park Tralee Co. Kerry

Re: <u>Proposal to sustainably harvest Ascophyllum nodosum within the Clew Bay complex</u>

Dear Dr Guinan

I refer to the above and your correspondence of the 29th of November addressed to the Chief Executive Officer, Dr Ciaran Byrne.

Seaweed has been traditionally harvested in Clew Bay for many years. In fact, Newport had two seaweed factories producing seaweed meal which was exported by ship from the harbour. The last factory closed in 1996 and, since then, seaweed harvested in Clew Bay has been purchased by Arramara Teoranta and transported to Galway. Currently there are a number of individuals who harvest seaweed seasonally in Clew Bay to supplement their annual income.

The current low intensity seaweed harvesting has not led to any impact or issues in relation to either sea or shore angling in the Clew Bay area. Inland Fisheries Ireland (IFI) is also of the view that sea weed harvesting should not impact oyster or scallop fishing and sea angling from boats.

Clew Bay is an important shore and sea angling venue and attracts large numbers of both recreational and tourist anglers annually who enjoy the angling experience the bay provides. These anglers also represent a significant source of revenue to area. In terms of the Water Framework Directive, Clew Bay has been allocated "high ecological status" in the Western River Basin District Management Plan and this status must be protected. Clew Bay is also a designated Shellfish Cultivation Area and there are a number of licensed aquaculture operations within the bay.

Having regard to its designation as a Special Area of Conservation, an Appropriate Assessment may be required for this activity and it will be important that the National Parks and Wildlife Service is fully consulted in relation to any proposed actions within the designated area. I understand that a Foreshore Licence may also be required. IFI would also recommend that the applicant should liaise with the Sea Fisheries Protection Authority as it may have some comment depending on the scale of the harvesting proposed.

While IFI has no specific role in relation to any approvals required for harvesting of seaweed, it welcomes the sustainable approach and has the following comments in relation to this proposal:

- There has been no indication provided in relation to the scale of the operation planned. Glearly, the quantities of seaweed involved will have a bearing on the issues that could arise.
- Ascophyllum nodosum is primarily an inter-tidal species and juvenile eel and sea trout may use this seaweed as cover from predators. The harvesting plan for Ascophyllum nodosum must ensure that adequate habitat is maintained for these and any other fish species utilising the weed for cover. Stands of weed should be allowed adequate time for re-growth between harvests.
- This proposal should not impinge in any way on the existing rights of the individuals currently harvesting seaweed in the Clew Bay area. The overall level of exploitation of this resource by all harvesters must be taken into account to ensure its sustainable management.
- Any activities associated with the harvest, storage and transport of seaweed should not in any way impact on the "High Ecological Status" of the water quality in Clew Bay as identified under the WFD or on any existing aquaculture operations located in the Bay. As such, cut weed should not, under any circumstances, be left on site and must be collected immediately after cutting.
- The list of angling locations at Clew Bay provided in the *West of Ireland Sea Angling Guide* is not exhaustive and harvesters should expect to encounter anglers at many other locations. Floating seaweed can make fishing difficult, catching on lines, hooks and covering bait. As such, all weed cut should be immediately collected and not allowed to float away with the tide and become problematic for ether shore or sea anglers.
- There is a large area of shoreline available in Clew Bay for harvesting but relatively small areas for shore angling. IFI would recommend that anglers' space is respected and that no harvesting takes place within 100m of areas where angling is taking place.

Provided that the above concerns are taken into consideration, IFI would have no objection to this proposal.

Yours sincerely

John Conneely Director

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