Rialtas na hÉireann
Government of Ireland

Screening for Appropriate Assessment

Adoption of Invasive Alien Species (*Rhododendron ponticum*) control measures within Owenduff / Nephin Complex Special Area of Conservation in accordance with Regulation 42A EC (Birds and Natural) Habitats Regulations 2011-2021

Prepared by the Department of Housing, Local Government and Heritage
npws.ie

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1. Introduction

This determination on Screening for Appropriate Assessment (AA) has been made by the Ecological Assessment Unit (EAU) of the Department of Housing, Local Government and Heritage (DHLGH) in accordance with Regulation 42A(8) of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 ('the 2011-2021 Regulations").[1]

On the 25th March 2025, in accordance with the requirements of Regulation 42A(3) of the 2011-2021 Regulations, the Minister for Housing, Local Government and Heritage ('the Minister') furnished the EAU with a request for a Screening for Appropriate Assessment (AA) determination on *Rhododendron ponticum* control measures within Owenduff/Nephin Complex Special Area of Conservation [Site Code: 000534] and Owenduff/Nephin Complex Special Protection Area [Site Code: 004098]. Hereafter referred to as "the project".

The EAU have evaluated and analysed the information contained in the referred to above document and location maps provided and carried out a determination. The purpose of this document is to provide a record and an audit trail of the EAU reasoned thinking in view of best scientific knowledge and the Conservation Objectives of these European Sites.

[1] As inserted by Regulation 7 of the European Union (Birds and Natural Habitats) (Amendment).

2. Background

Pursuant to Regulation 42A(1) of the 2011-2021 Regulations, a Screening for AA is required to be carried out on the project. AA is a process required under Article 6(3) of the EU Habitats Directive. Article 6(3) is transposed in Ireland by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended, and by Part XAB of the Planning and Development Act, 2000, as amended.

All plans and projects which are not directly connected with or necessary to the management of a European Site, but which either individually or in combination with other plans or projects, are likely to have a significant effect on a “European Site”, require an AA of these effects to determine if they will adversely affect the integrity of these sites. The proposed Rhododendron clearance is considered to fall under the requirements of AA as applied to all plans and projects.

The Screening for AA process scrutinises the plan or project to determine if there is potential for likely significant effects either individually or in combination with other plans or projects, on a European Site. European Sites are part of the Natura 2000 network and include those designated as Special Areas of Conservation (SAC), Candidate SACs (cSACs) or Special Protection Areas (SPA). This Screening for Appropriate Assessment describes the outcome of this analysis in respect of the project.

3. Legislation and Guidance

This section provides details on the adopted methodology with sources of guidance and information gathered to inform the preparation of the report.

3.1. Guidance and Data Sources

- AA under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10;
- Communication from the Commission on the precautionary principle. European Commission (2000);
- Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC (European Commission, 2007);
- AA of Plans and Projects in Ireland - Guidance for Planning Authorities (Department of Environment, Heritage and Local Government, 2010 revision);
- Guidelines for Good Practice AA of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011);
- Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2018); [hereafter referred to as MN 2018];
- Office of the Planning Regulator Practice Note PN01 - AA Screening for Development Management (OPR, 2021);
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2021);
- Higgins, G.T. (2008) Rhododendron ponticum: A guide to management on nature conservation sites. Irish Wildlife Manuals, No. 33. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin, Ireland; and,
- Monaco, A., and Genovesi, P. (2014) European Guidelines on Protected Areas and Invasive Alien Species, Council of Europe.

3.2. Assessment Methodology

This report is based on review of desktop data. Sources of information utilised for this report and accessed during April 2025 include the following:

- National Parks & Wildlife Service (NPWS) Designations Viewer[2]; and,
- National Biodiversity Data Centre (NBDC) Maps[3].

3.3. Legislative Background

According to the EU Habitats Directive (92/43/EEC) and the EU Birds Directive (79/409/EEC), Member States are required to establish a Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU.

In Ireland, the Natura 2000 network of European sites comprises SACs, candidate SACs and SPAs.

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and all migratory birds and their habitats. The Annex habitats and species, for which each site is selected, are the Qualifying Interests (QI) for SACs and Special Conservation Interests (SCI) for SPAs of each site. Conservation Objectives for the site are defined for these qualifying interests.

A key requirement of the Habitats Directive is that the effects of any plan or project, which is not directly connected with or necessary to the management of a European Site, but which alone, or in combination with, other plans or projects, are likely to have a significant effect on a European Site, should be assessed before any decision is made to allow that plan or project to proceed. The obligation to undertake a screening for AA, and if necessary, an AA, derives from Article 6(3) of the Habitats Directive and both involve a number of steps and tests that need to be applied in sequential order.

Article 6(3) is concerned with the strict protection of sites, while Article 6(4) is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

[2] National Parks & Wildlife Service Designation Viewer. Accessed at ArcGIS Web Application 17/04/2025

[3] National Biodiversity Data Centre Maps. Accessed at Maps - Biodiversity Maps (biodiversityireland.ie) 17/04/2025

Article 6(3) of the Habitats Directive states:

> "Any plan or project not directly connected with, or necessary to, the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and if appropriate, after having obtained the opinion of the general public".

Article 6(4) states:

> "If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.
>
> Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

The competent authority is required to carry out a screening for AA, and if necessary, an AA as required by Article 6(3) of the Habitats Directive. If the competent authority determines that the plan or project will adversely affect the integrity of a European site, it may only authorise that plan or project by following the Article 6(4) procedure.

The Article 6(3) and 6(4) procedures are outlined as follows:

Stage 1 - Screening for Appropriate Assessment – to assess, in view of best scientific knowledge, if the project or plan, individually or in combination with another plan or project is likely to have a significant effect on the Natura 2000 site.

Stage 2 - Appropriate Assessment – This is required if it cannot be excluded, on the basis of objective information, that the project or plan, individually or in combination with other plans or projects, will have a significant effect on a Natura 2000 site. The AA must include a final determination by the competent authority as to whether or not a proposed project would adversely affect the integrity of a Natura 2000 site. In order to reach a final determination, the competent authority must undertake examination, analysis and evaluation, followed by findings, conclusions and a final determination. The appropriate assessment must contain complete, precise and definitive findings and conclusions, and may not have lacunae or gaps.

Stage 3 – Assessment of alternative solutions - the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

Stage 4 - Assessment where no alternative solutions exist and where adverse impacts remain - an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

Under Regulation 42A(1) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), the Ecological Assessment Unit is the competent authority in relation to screening for AA of projects and plans (such as the proposed conservation measures) which the Minister proposes to undertake or adopt.

4. Overview of the Project

The Owenduff/Nephin Complex SAC and SPA designations overlap and encompass a large area of relatively intact blanket bog and mountains incorporates the catchment of the Owenduff River and much of the Nephin Beg Mountain range, and is situated in Co. Mayo (See Figure 1).

Within the site, the terrain varies enormously from the peaks of the Nephin Beg Mountains, which reach a maximum altitude of 717 m, to areas where the land slopes westwards to the floodplain of the Owenduff River. The upper slopes of the mountains in the Owenduff/Nephin complex carry wet heath and cliff vegetation, and patches of upland grassland are frequent. The presence of small corrie lakes and rock basin lakes adds to the habitat diversity of the mountains. Along its southern and eastern limits, the site is bounded by coniferous plantations and/or the high mountain slopes of the Nephin Begs.

The upper slopes of the mountains support wet heath, upland grassland and cliff vegetation. The lower mountain slopes are covered with blanket bog, with a broad representation of good quality bog habitats occurring. The Special Protection Area is of special conservation interest for Merlin and Golden Plover (See Figure 2).

Rhododendron ponticum is present within the site. Widely recognised as one of the most problematic non-native invasive species currently threatening Irish biodiversity; particularly our native woodlands, bogs, heaths and riparian zones with knock-on effects on watercourses. By forming extensive, single species stands it effectively excludes native plant communities from their natural habitats. Increased awareness of its detrimental impacts, coupled with the discovery that it can act as a host for the plant pathogen *Phythopthera ramorum*, has recently lead to an urgent requirement for *R. ponticum* removal all across Ireland.

In summary the purpose of the project is to control Rhododendron within pre-defined management areas at Letterkeen (Vary's Loop Trail) Co. Mayo within and adjacent to the Owenduff/Nephin Complex SAC (Figure 3).

5. Purpose

Native to South-west Europe and southwest Asia, Rhododendron is a large evergreen shrub with leathery leaves, purple to pink flowers and solid stems forming into a trunk when mature. Rhododendron spreads by both suckers and seed. Each flower head can produce between three thousand and seven thousand small seeds which can remain viable in the soil for several years. Larger plants can produce several million seeds per year. The small seeds are dispersed up to 100 metres by wind and water under favourable open conditions. Once Rhododendron has invaded an area, few native plants survive.

Potentially toxic chemicals, particularly 'free' phenols, occur in significant quantities in the tissues of Rhododendron, such that foliage is unpalatable to vertebrates

(therefore not naturally suppressed through grazing or browsing), and few insects feed on the plant. Another potentially major impact of Rhododendron is its effect on native tree species, notably Oak (*Quercus*) and nursery stock through the fungus-like pathogens *Phytophthora ramorum* and *P. kernoviae*, which are harboured by Rhododendron.

In September 2011, comprehensive regulations which address deficiencies in Irish law implementing the EU Birds and Habitats Directives were signed into law. The European Communities (Birds and Natural Habitats) Regulations 2011 contain important new provisions to address the problem of invasive species. A black list of unwanted species is set out in the Regulations. It will be an offence without a licence, to release or allow to disperse or escape, to breed, propagate, import, transport, sell or advertise such species. Two regulations that deal specifically with these scheduled lists of species are:

> *Regulation 49: Prohibition on introduction and dispersal of certain species.*

The Conference of the Parties to the Convention on Biological Diversity (CBD) at their tenth meeting set out a Strategic Plan for Biodiversity with 20 headline targets for 2020 organized under five strategic goals. The mission of the Strategic Plan is to —take effective and urgent action to halt the loss of biodiversity in order to ensure that by 2020 ecosystems are resilient and continue to provide essential services.

> *Target 9 states: By 2020, invasive alien species and pathways are identified and prioritized, priority species are controlled or eradicated, and measures are in place to manage pathways to prevent their introduction and establishment*.

On September 29th, 2014, the European Council adopted a Regulation on the prevention and management of the introduction and spread of invasive alien species [1143/2014]. The Regulation, that is a binding legal tool for all Member States, entered into force January 1st 2015. The Regulation lays down rules to prevent, minimise and mitigate the adverse impacts of the introduction and spread, both intentional and unintentional, of invasive alien species on biodiversity and the related ecosystem services, as well as other adverse impact on human health or the economy.

On 25th January 2024, Ireland's 4th National Biodiversity Action Plan (NBAP), for the period 2023-2030 was launched with 5 objectives. The plan aims to deliver the transformative changes required to the ways in which we value and protect nature. The 4th NBAP has been developed with the support, advice and input of the interdepartmental Biodiversity Working Group and the independent Biodiversity Forum. Objective 2 focuses on invasive species management.

> *Action 1D5 states that NPWS will continue to support Local Authorities biodiversity projects through the LBAF, which includes action on invasive alien species, throughout the lifetime of this Plan*.

Outcome 2H includes actions related to Invasive Alien Species (IAS) are controlled and managed on an all-island basis to reduce the harmful impact they have on biodiversity and measures are undertaken to tackle the introduction and spread of new IAS to the environment.

6. Project Description

Treatment: The only herbicide to be used is glyphosate. The most appropriate herbicide currently available for Rhododendron ponticum control is *Roundup™ Biactive (≡ Roundup™ Probiactive)*. Stem treatment will be the method used whereby a solution of glyphosate will be applied to the cut or broken stems of the plant. Please refer to "*Rhododendron ponticum*: A guide to management on nature conservation sites" Irish Wildlife Manuals, No. 33 for additional guidance.

- Removal of plants less than 20cm in height: Plants will be pulled manually ensuring all root stock is fully removed from the ground and all associated earth is fully shaken off;
- Removal of plants greater than 20cm in height: For plants with a stem diameter of less than 2cm the stem can be broken at the base ensuring that the stem is not fully severed and a 14% solution of glyphosate (6 parts water to 1-part glyphosate) can be manually applied to the broken area. For plants with stem diameter greater than 2cm, a notch will be cut with a hatchet from two sides of each stem and the solution of 14% herbicide manually applied;
- No Foliar Spraying: Foliar spraying is not permitted, ensuring no potential hydrological pathway exists during the course of Rhododendron clearance;
- Contractor Materials: Storage of materials and refilling of equipment for Rhododendron clearance will be off site and in a secure location. All materials used for the treatment of Rhododendron will be removed from the areas on completion of works; and,
- Retreatment and Regrowth: While it may take as long as up to 7 months for the herbicide to take full effect and for the plants to fully die, the treated areas will be inspected by NPWS staff and trained personnel to ensure correct methodologies are being applied by visual inspection of treated plants.
    - Where following visual inspection it is deemed that the Rhododendron plants in the area have not all been eradicated these will be effectively retreated within six months.
    - All cleared sites in an area where seed input is ongoing will require ongoing management so that re-infestation from seed is not allowed to succeed.

- The project must regular and systematic follow-up as required to deal with re-growth and seedling germination within the defined management areas.
- As long as an external seed source remains, repeated systematic sweeps through the site will be required, to prevent newly established plants from reaching flowering age and setting seed.

The Project Manager or Contractor (where applicable) will liaise with Regional NPWS staff to ensure that surveys and up to date field data informs the roll out of the control programme. If elements of the project are required to be take place during the bird nesting season (March- end of August inclusive) pursuant to Section 40(2)(d) of the Wildlife Acts 1976-2012, the Project Manager and/or a NPWS Authorised Officer will ensure the project can progress (access, route and egress) in compliance with Section 22 and Section 23 of those Acts prior to works (where applicable).

The Project Manager will ensure best practice guidance on correct invasive and non-native species control procedures outline above are adhered to. Work will be reviewed by the Project Manager and/or a NPWS Authorised Officer at regular intervals to ensure that correct procedures are being followed.

7. Part 1: Necessary conservation measures

Answer these questions if the activity is “directly connected with or necessary to the management of the site”. Otherwise go to Part 2.

a). List the European site(s) and the relevant Conservation Objectives (include version number of the Conservation Objective).

Owenduff/Nephin Complex SAC [Site code: 000534].

NPWS (2017) Conservation Objectives: Owenduff/Nephin Complex SAC 000534. Version 1. Accessed 17th April 2025.

Available at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000534.pdf

Qualifying Interests

Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]

~ Overall conservation status: **Bad**

Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]

~ Overall conservation status: **Inadequate**

Natural dystrophic lakes and ponds [3160]

~ Overall conservation status: **Inadequate**

Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]

~ Overall conservation status: **Inadequate**

Northern Atlantic wet heaths with *Erica tetralix* [4010]

~ Overall conservation status: **Bad**

Alpine and Boreal heaths [4060]

~ Overall conservation status: **Bad**

Juniperus communis formations on heaths or calcareous grasslands [5130]

~ Overall conservation status: **Favourable**

Blanket bogs (* if active bog) [7130]

~ Overall conservation status: **Bad**

Transition mires and quaking bogs [7140]

~ Overall conservation status: **Bad**

Salmon *Salmo salar* [1106]

~ Overall conservation status: **Inadequate**

Otter *Lutra lutra* [1355]

~ Overall conservation status: **Favourable**

Marsh Saxifrage *Saxifraga hirculus* [1528]

~ Overall conservation status: **Favourable**

Slender Green Feather-moss *Drepanocladus vernicosus* [1393]

~ Overall conservation status: **Favourable**

Conservation Objectives for Qualifying Interests.

Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]

To maintain the favourable conservation condition of Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area.
- Habitat distribution.
- Typical species.
- Vegetation composition: characteristic zonation.
- Vegetation distribution: maximum depth.
- Hydrological regime: water level fluctuation.
- Lake substratum quality.

- Water quality: transparency; nutrients; phytoplankton biomass; phytoplankton composition; attached algal biomass; and, macrophyte status.
- Acidification status.
- Water colour.
- Dissolved organic carbon (DOC).
- Turbidity.
- Fringing habitat: area and condition.

Natural dystrophic lakes and ponds [3160]

To maintain the favourable conservation condition of Natural dystrophic lakes and ponds in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes

- Habitat area.
- Habitat distribution.
- Typical species.
- Vegetation composition: characteristic zonation.
- Vegetation distribution: maximum depth.
- Hydrological regime: water level fluctuation.
- Lake substratum quality.
- Water quality: transparency; nutrients; phytoplankton biomass; phytoplankton composition; attached algal biomass; macrophyte status.
- Acidification status.
- Water colour.
- Dissolved organic carbon (DOC).
- Turbidity.
- Fringing habitat: area and condition.

Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]

To maintain the favourable conservation condition of Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area.
- Habitat distribution.
- Hydrological regime: river flow; and, groundwater discharge.
- Substratum composition: particle size range.
- Water quality.
- Vegetation composition: typical species.
- Floodplain connectivity: area.
- Riparian habitat: area.

Northern Atlantic wet heaths with Erica tetralix [4010]

To restore the favourable conservation condition of Northern Atlantic wet heaths with Erica tetralix in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area.
- Habitat distribution.
- Ecosystem function: soil nutrients.
- Community diversity.
- Vegetation composition: cross leaved heath; positive indicators species; lichens and bryophytes; ericoid species and crowberry; dwarf shrub species; negative indicator species; non-native species; native trees and shrubs; bracken; and, soft rush.
- Vegetation structure: Sphagnum condition; signs of browsing; and, burning.
- Physical structure: disturbed bare ground; drainage.

- Indicators of local distinctiveness.

Alpine and Boreal heaths [4060]

To restore the favourable conservation condition of Alpine and Boreal heaths in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area
- Habitat distribution
- Ecosystem function: soil nutrients
- Community diversity
- Vegetation composition: lichens and bryophytes; positive indicators species; dwarf shrub species; negative indicator species; and, non-native species.
- Vegetation structure: signs of grazing; signs of browsing; and, burning.
- Physical structure: disturbed bare ground; drainage.
- Indicators of local distinctiveness

Juniperus communis formations on heaths or calcareous grasslands [5130]

To restore the favourable conservation condition of Juniperus communis formations on heaths or calcareous grasslands in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area.
- Habitat distribution.
- Juniper formation size.
- Vegetation structure: female fruiting plants; seedling recruitment; live juniper;
- Vegetation of composition: negative indicator species.
- Physical structure: germination niches.

- Formation structure: browning/die-back of plants; and, evidence of browsing and bark stripping.
- Indicators of local distinctiveness.

Blanket bogs (* if active bog) [7130]

To restore the favourable conservation condition of Blanket bogs (* if active bog) in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area.
- Habitat distribution.
- Ecosystem function: soil nutrients; peat formation; hydrology.
- Community diversity.
- Vegetation composition: positive indicator species; lichens and bryophytes; potential dominant species; negative indicator species; non-native species; and, native trees and shrubs.
- Vegetation structure: Sphagnum condition; signs of browsing; and, burning.
- Physical structure: disturbed bare ground; drainage; and, erosion.
- Indicators of local distinctiveness.

Transition mires and quaking bogs [7140]

To restore the favourable conservation condition of Transition mires and quaking bogs in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Habitat area.
- Habitat distribution.
- Ecosystem function: soil nutrients.
- Community diversity.

- Vegetation composition: number of positive indicator species; number of core positive indicator species; cover of positive indicator species; negative indicator species; and, non-native species.
- Vegetation structure: height.
- Physical structure: disturbed bare ground; and, drainage.
- Indicators of local distinctiveness.
-

Salmon Salmo salar [1106]

To restore the favourable conservation condition of Atlantic Salmon in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Distribution: extent of anadromy.
- Adult spawning fish.
- Salmon fry abundance.
- Out-migrating smolt abundance.
- Number and distribution of redds.
- Water quality

Otter Lutra lutra [1355]

To maintain the favourable conservation condition of Otter in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Distribution.
- Extent of terrestrial habitat.
- Extent of marine habitat.
- Extent of freshwater (lake) habitat.
- Couching sites and holts.
- Fish biomass available.
- Barriers to connectivity.

Saxifraga hirculus (Marsh Saxifrage) [1528]

To maintain the favourable conservation condition of Marsh Saxifrage in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Distribution of populations
- Population size: number of rosettes; and, area of occupancy.
- Hydrological conditions: water level.
- Vegetation composition: positive indicator species; and, negative indicator species.
- Vegetation structure: sward height; and, grazing level

Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]

To maintain the favourable conservation condition of Slender Green Feather-moss (Shining Sickle-moss) in Owenduff/Nephin Complex SAC, which is defined by the following list of attributes:

- Distribution of populations
- Population size.
- Population cover.
- Area of suitable habitat.
- Hydrological conditions: water level table.
- Vegetation composition: tree cover; shrub cover; grass cover; bryophyte cover; and, cover of *Callergonella cuspidata*.
- Vegetation structure: vegetation height.

Owenduff/Nephin Complex SPA [Site code: 004098].

NPWS (2022) Conservation objectives for Owenduff/Nephin Complex SPA [004098]. First Order Site-specific Conservation Objectives Version 1.0. Accessed 17th April 2023.

Available at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004098.pdf

Special Conservation Interests

Merlin (Falco columbarius) [A098]

Golden Plover (Pluvialis apricaria) [A140]

Conservation Objectives for Special Conservation Interests.

Merlin Falco columbarius [A098]

To restore the favourable conservation condition of Merlin in Owenduff/Nephin Complex SPA.

Golden Plover Pluvialis apricaria [A140]

To restore the favourable conservation condition of golden plover in Owenduff/Nephin Complex SPA.

b). State how this activity furthers the Conservation Objective(s)

Under Article 6 of the EU Habitats Directive, DHLGH is required to ensure the favourable conservation status of all Annex I habitats and Annex II species within SACs.

The Conservation Objectives seek to maintain protected SAC feature(s) where evidence exists that it is in favourable condition in the site, or where there is uncertainty concerning the assessed condition of a feature but no reason to suspect deterioration in condition since designation.

Where evidence exists that a feature is declining and/or damaged and therefore not in a favourable condition in the site, the Conservation Objectives will seek to restore the protected feature.

Since Rhododendron is known to negatively alter habitat condition, the implementation of the removal measures within the site as outlined above

will directly contribute to the Site Specific Conservation Objectives. Notably:

Northern Atlantic wet heaths with Erica tetralix [4010]

- **Ecosystem function.**
- **Community diversity.**
- **Vegetation composition.**
- **Vegetation structure.**
- **Indicators of local distinctiveness.**

Juniperus communis formations on heaths or calcareous grasslands [5130]

- **Habitat area.**
- **Habitat distribution.**
- **Juniper formation size.**
- **Vegetation structure: female fruiting plants; seedling recruitment; live juniper;**
- **Vegetation of composition: negative indicator species.**

In the absence of the project, the Conservation Objectives for Owenduff/Nephin Complex SAC would not be achieved as there would be continued highly detrimental impacts of invasive *R. ponticum*, dramatically reducing levels of habitat cover and species richness.

The project will be beneficial to maintaining and working towards achieving favourable conservation condition of the heath habitats in the site and the typical species of these protected habitat types.

c). Does this activity have the potential to impact negatively on any Conservation Objective (CO), Qualifying Interest (QI)/Special Conservation Interest (SCI) for this or any other European site?

Yes ☐ No ☑

The effect on European Sites and their QI/SCI within a defined Zone of Influence of the proposed *R. ponticum* control measures was assessed using expert opinion.

A review of best available scientific information shows no evidence of any chemical legacy through the application of this method of *R. ponticum* treatment in soils, suggesting that chemical impacts do not pose any indirect or legacy effects, or barriers to habitat recovery.

The effect on all QI and SCI features of the SAC & SPA have been considered. Proposed *R. ponticum* control measures will improve the the conservation condition of heath habitats which support the achievement of Conservation Objectives for SCI of the Owenduff/Nephin Complex SPA, notably:

Merlin Falco columbarius [A098]

Golden Plover Pluvialis apricaria [A140]

There is not considered to be any potential for disturbance beyond a *de minimus* level on the SCI bird populations for which the Owenduff/Nephin Complex SPA is designated. Restoration of the favourable conservation status of the target QI habitats will help to improve the prey availability for Merlin.

No significant adverse impacts on the QI or SCI features of any other SAC or SPA are anticipated.

d). Are there aspects of this activity which are NOT directly connected with the management of the site?

Yes ☐ No ☑

If the answer to EITHER of the above questions is **Yes** a Screening for AA is required, go to Part 2.

If the answer to BOTH questions is **No** go to Part 5.

8. Part 2: Identification of European Sites within the Potential Zone of Influence of proposed activities

List all European sites which may be affected by this activity because they are linked by an ecological pathway. If the site has a second European designation (SAC, SPA) this also needs to be considered.

9. Part 3: Assess the likelihood of significant effects

Provide this information for **each site** listed in Part 2.

List the QI/SCIs for the site(s), their current conservation condition and the Site Specific Conservation Objectives (SSCO) for that QI/SCI. Then answer the questions about the impact on that QI/SCI.

Tick all the boxes below which may apply.

Your answer will determine if the activity is likely to have a (negative) effect on this QI/SCI. Negative effects may arise because of the activity's location within the site; its proximity to the QI/SCI or the size of the land take involved; the abstraction of water or minerals; emissions or waste arising; the types of transport or machinery being used; the length of time involved or seasonality of the work.

a). There is likely to be a reduction in the area of QI/SCI habitat ☐

b). The physical/chemical quality of the environment is likely to be changed in a way which may cause the deterioration of the QI/SCI habitat (e.g. applying lime to an acidic soil) ☐

c). The structure of the ecological community is likely to be altered (e.g. through altered species composition) in a way which will have negative impact on the QI/SCI. ☐

d). A QI/SCI species is likely to be disturbed (e.g. through noise, vibrations) ☐

e). The population size, characteristics or reproductive success of a QI/SCI species is likely to be changed either directly or indirectly (e.g. lighting close to a bat roost entrance) ☐

f). QI/SCI species or habitats are likely to be more vulnerable to change or less resilient to external change (e.g. to flooding, fire or drought) ☐

g). There are likely to be effects on other species /habitats (not a QI/SCI for this site) which are ecologically linked with this QI/SCI and, as a consequence, there are likely to be negative effects on this QI/SCI (e.g. the impacts on geese which are the SCI when their non-QI feeding areas are damaged). ☐

h). This activity will cause a deterioration in the conservation condition of this QI/SCI. ☐

i). There are likely to be other ecological effects not listed above which are likely to have a significant effect on the QI/SCI. ☐

Explain the effects:

_____

If you have ticked a box for any QI/SCI in any of the sites affected by this activity the likelihood of a significant effect cannot be ruled out and the activity MUST be screened IN for AA.

10. Part 4: In Combination Effects

Is this activity likely to cause negative effects in combination with any other plan or project?

(In answering this question you should consider any other consents which have been applied for or granted. For example, other ARCs, planning consents, forestry consents, or activities authorised as part of an agreed farm or land management plan. List the plans or projects considered).

_____

No ☑ **Yes** ☐ **Uncertain** ☐

If the answer is Yes or Uncertain the activity MUST be screened IN for AA. Fill in Part 5 accordingly.

11. Part 5: Findings of the Screening for AA

Screening not carried out as the activity is “directly connected with or necessary to the management of the site”. ☑

Likely significant effects are expected or uncertain.

This activity Screens **IN** and AA **is** required. ☐

Likely significant effects are NOT expected.

This activity Screens **OUT** AA **is not** required. ☐

Signature: Darren Ellis, Ecological Assessment Unit

Date: 28th May 2025

12. Part 6: Conclusion

Following an analysis of the activity, the EAU determines[4], in accordance with Regulation 42A(8) of the 2011 Regulations, that the *Rhododendron ponticum* control measures within the Owenduff/Nephin Complex SAC at targeted areas in the vicinity of Letterkeen (Vary’s Loop Trail) Co. Mayo are entirely comprised of activities that directly support the Conservation Objectives of this European site.

It can be concluded with certainty that the project is a necessary conservation measure that is directly connected with or necessary for the management of the site.

[4] Darren Ellis (Ecological Assessment Unit, Department of Housing, Local Government and Heritage) 28th May 2025

13. Supplementary Information

Figure 1. (below): Location of Owenduff/Nephin Complex Special Area of Conservation as per NPWS (2017) Conservation Objectives: Version 1.

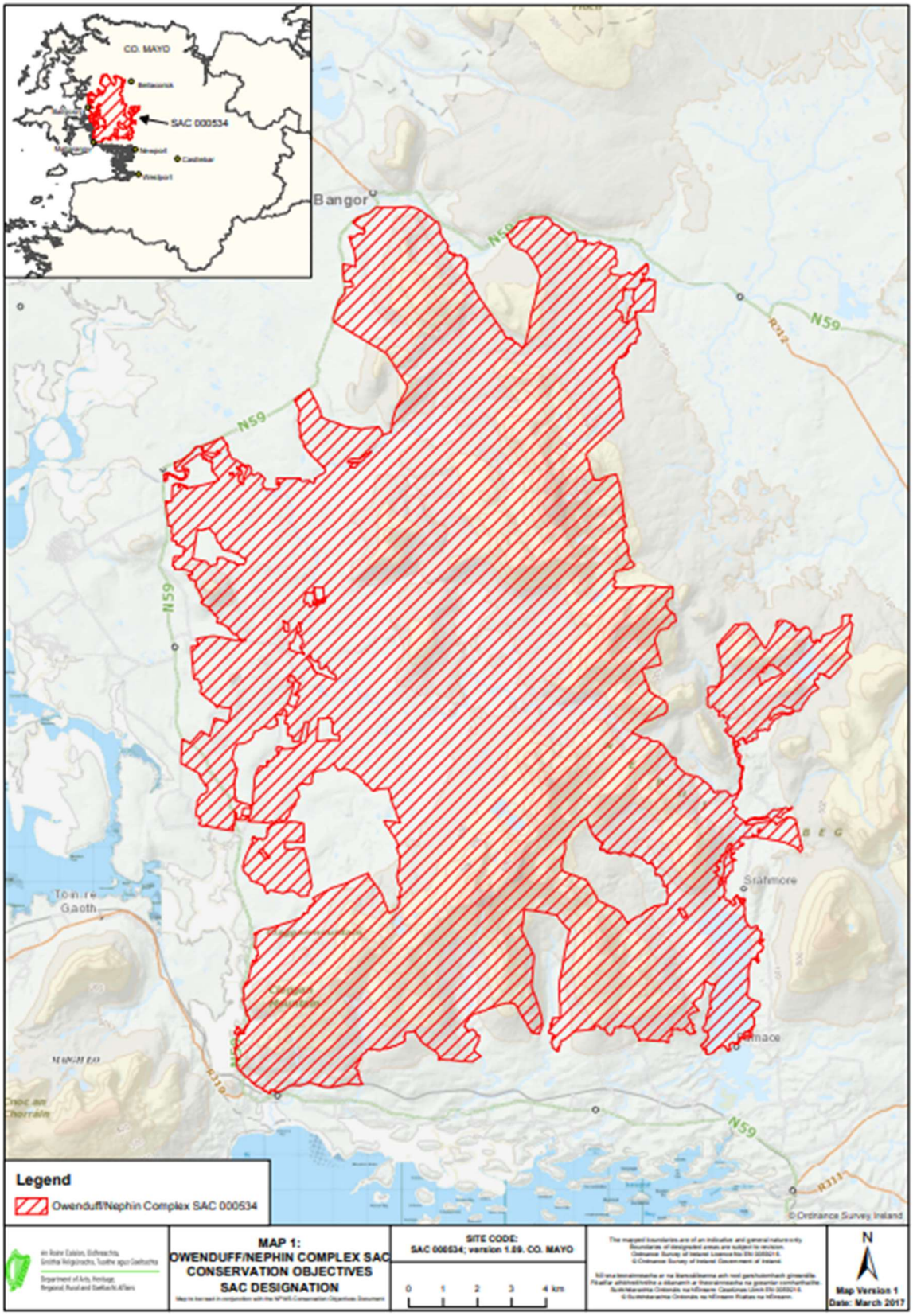


Figure 2. (below): Location of European sites, adjacently and overlapping designations in relation to the Owenduff/Nephin Complex SAC as per NPWS (2017) Conservation Objectives: Version 1.

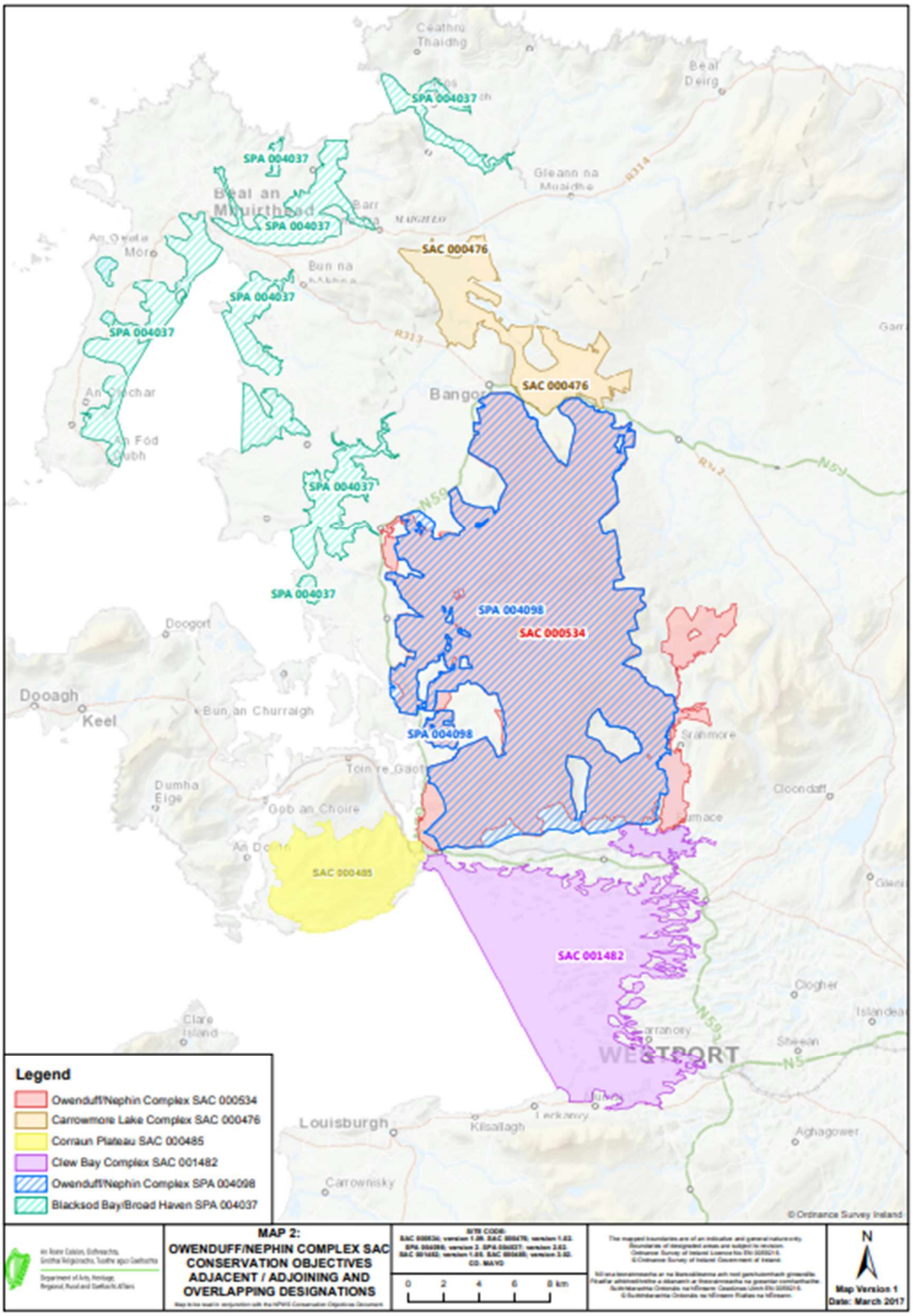
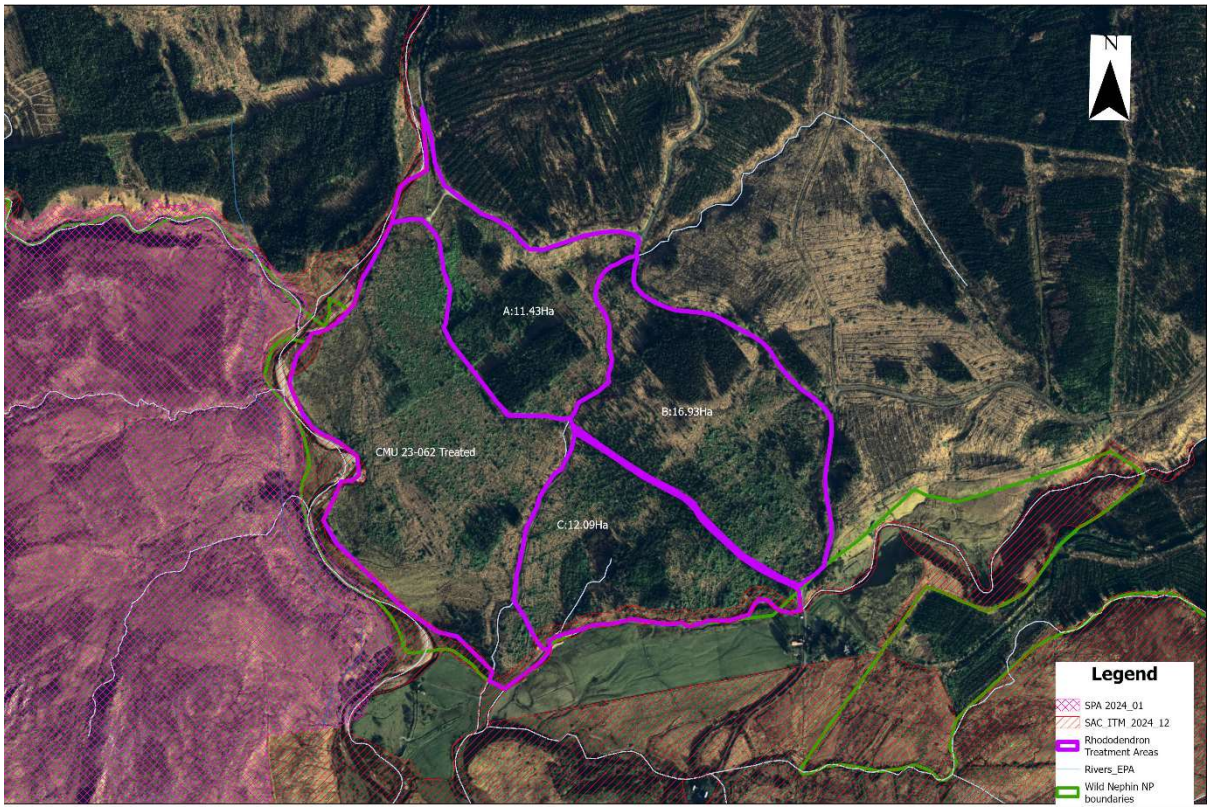


Figure 3. (below): Outline of plots proposed for *R. ponticum* control measures (purple outline) partially overlapping and adjacent to Owenduff/ Nephin Complex SAC.



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