

Section 5



Mr Kevin Hodnett
Aquaculture & Foreshore Management Division
Department of Agriculture, Food and the Marine
Clenakilly
Co. Cork

09.09.2014
BY: [illegible]

Ref. Statutory Consultation Process - Shot Head Licence Application.

Dear Kevin,

I refer to your letter dated August 28th 2014 regarding a submission received from the Department of Environment, Community and Local Government (DECLG).

With reference to structural integrity, Marine Harvest Ireland (MHI) concurs with DECLG that the proposed farm structures for Shot Head must be fit for extreme weather conditions and meet the requirements of DAFM. MHI utilises the best available aquaculture technology in order to withstand the unique conditions along the Irish Atlantic coastline. In addition, MHI has implemented a routine inspection and maintenance programme for all of its marine aquaculture installations in order to protect our stock and equipment.

Regarding visual amenity, Cork Co. Council was furnished with a copy of the Shot Head application in addition the full EIS and related documents, on January 10th 2012. No submission or comments on this application were received from Cork Co. Council.

With Regards

Catherine McManus
Catherine McManus
[illegible]

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OKeeffe, Therese

From: Hayes, Liz
 Sent: 22 August 2014 14:38
 To: OKeeffe, Therese
 Cc: Hodnett, Kevin
 Subject: FW: Acquaculture report, T5/555
 Attachments: SHOT AQUACULTURE SALMON FARM IN BANTRY BAY.DOC

Therese/Kevin

For your information please

Regards
Liz

From: Rosaleen NiGhriallais - (DECLG) [<mailto:Rosaleen.NiGhriallais@environ.ie>]
Sent: 22 August 2014 14:21
To: Hayes, Liz
Subject: Acquaculture report, T5/555

Hi Liz,

Please find attached our observations on the acquaculture application, Shot Acquaculture salmon farm in Bantry Bay.

Regards,

Rosaleen Ní Ghriallais
 Marine Planning & Foreshore,
 Dept of Environment, Community & Local Government,
 Newtown Rd.,
 Wexford.
Rosaleen.nighriallais@environ.ie

Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

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To Whom It May Concern,

RE Aquaculture Licence and accompanying foreshore licence application from Marine Harvest Ireland for salmon farm development at Shot Head, Bantry Bay Co Cork-DAFM'S communication to DOEHG-(your minute of 10/7/2014 to E Mooney also refers)

In relation to the above this Aquaculture Licence Application as made to DAFM has been referred to DOECLG (Foreshore Unit) for comment. Our views are as follows:

OVERVIEW

Marine Harvest Ireland is applying for a licence to farm Atlantic Salmon off the south coast of Ireland (off Shot Head in Bantry Bay). An EIS has been prepared and has been submitted to DAFM as part of the Aquaculture Licence Application. Watermark aqua environmental (Consultants acting on behalf of Marine Harvest Ireland) have carried out extensive scientific and environmental investigations including studies of local geography, topography, hydrography, wave climate, water depth and visual impact on the locality and coastline and of candidate sites remaining in Bantry Bay it was submitted that the area selected to the east of Shot Head is the most suitable

PROPOSED DEVELOPMENT

The licence application is for a site that can accommodate the safe and efficient farming of 3500 Tonnes of salmon per annum-reaching this target in year 4- with intermittent fallow periods as outlined at Q2(viii)(a) in the completed Application Form. The area of the site as proposed (ref completed Aquaculture Licence Application Form and Drawings/Maps appended thereto) is 40HA(850m x 500m) , however the actual footprint of the proposed cages within this area is much smaller at 5.88HA(420m x 120m) as shown on the Drawing accompanying the application.

The fish will be held in circular net pens/cages with 12 No cages deployed for the first 15 months and temporarily rising to 14 No during biennial grading/harvesting for 4 months between Months 16-20(Feb-June in year 2 of cycle). Site will be fallow for up to two months between Months 23 and 24 before restocking

Cages will be circular plastic frame (128m circumference-40.8m diameter) comprising stanchions, rails and galvanised steel reinforced triple-pipe flotation collar. The cages will have a cubic capacity of 19000m³ per cage with a depth of 15m from mid centre of bottom net. The mooring and anchor arrangements are shown with reference to drawings accompanying the application. It is proposed to fit a yellow flashing light to each corner of the mooring system. Radar reflectors will also be fitted on all corner cages and on the centre cages. A navigation buoy with flashing light, yellow St Andrew's cross and radar reflector will also be moored to the SE and SW corner anchors. Proposed navigational aids may be modified, consistent with the specification requirements for the site as set down in the terms of the Aquaculture Licence, an/or as advised by MSO and CIL. A generalised layout and specification diagram for the proposed navigational aids/lighting/markings is provided with the application form.



No access across the tidal foreshore will be required by the company, however nearby piers (Castletown Harbour, Beal Lough Pier, Ardrigole Pier and Trafrask pier, and some subsidiary piers) will be required for the movement of vessels to and from the site as outlined at 2.1 in the completed application form.

In their determination of this Aquaculture Licence Application DAFM can be advised to take cognisance of the following:

STRUCTURAL INTEGRITY

It is noted that the site as proposed along the coast between Shot Head and Mehal Head is in an unsheltered and reasonably exposed location in Bantry Bay. The Applicants would need to demonstrate to DAFM's satisfaction the structural integrity of the proposed anchor/mooring arrangements for the cages especially in relation to extreme wave/current and tidal situations linked to extreme weather conditions. They would need to demonstrate that the proposed structures are fit for purpose under all these extreme conditions. Cage and rope/net fatigue and wear and tear over time would also need to be factored into this assessment and the Applicants would need to satisfy DAFM in relation to their contingency plans for dealing with defective or loose structures should they arise.

NAVIGATION

While a proposed navigation marking and lighting system is put forward in the application it is noted that the "proposed navigational aids may be modified, consistent with the specification requirements for the site as set down in the terms of the Aquaculture Licence, as advised by MSO and CIL" this is acceptable

VISUAL AMENITY

This may be considered a scenic part of the Bantry Bay/West Cork Coastline and the proposed structures, which will be within app 300m of the coastline at their nearest point, may impact visually on this status. It is recommended that the views of Cork Co Co should be obtained in this regard.

The Applicants would need to demonstrate to the satisfaction of Cork Co as appropriate that the proposed development is in conformance with the relevant County Development Plans in terms of its policies and plans in relation to visual and tourism amenity along the relevant coastlines and in particular the Bantry Bay coastline adjacent to the proposed salmon farm .

This is without prejudice to any views that the NPWS (within DOEHLG) may have from a nature conservation perspective.

Regards,

Rosaleen Ní Ghriallais
Marine Planning & Foreshore
Department of Environment, Community & Local Government,
Newtown Rd.,
Wexford.
Rosaleen.nighriallais@environ.ie

O'Keene, Therese

From: Kelly, JohnA
Sent: 07 February 2014 10:04
To: O'Keefe, Therese
Subject: FW: Shot Head - update

Therese

FYI and file please.

JAK.

From: Hodnett, Kevin
Sent: 05 February 2014 18:16
To: OSullivan, Tony
Cc: Quinlan, John; Kelly, JohnA
Subject: RE: Shot Head - update

Thanks Tony

Kevin Hodnett

Assistant Principal,
Aquaculture & Foreshore Management Division,
Dept of Agriculture, Food and the Marine,
National Seafood Centre,
Clonakilty,
Co. Cork

Tel: 023 8666608

From: OSullivan, Tony
Sent: 06 February 2014 17:47
To: Kelly, JohnA; Hodnett, Kevin
Cc: McHale, John; Dillon, Noel; Quinlan, John
Subject: RE: Shot Head - update

John / Kevin,

Further to the meeting held in Dublin on 23 January 2014 (Noel Dillon attended), I understand that confirmation is required from MED on the up to date position in respect of the three items below:

- * Confirm that MED have received and reviewed all 77 objections.
- * Confirm whether MED require, or do not require, further information and
- * re-submit any conditions that MED would request be added to any licence.

Response is as follows:

- * The first item is addressed in my mail of 28 January 2014 below.
- * MED does not require further information from the applicant prior to licence determination.
- * Regarding resubmission of conditions required, there are none for resubmission (however see below).

Best Regards,
Tony

Issue – that the new licence templates will be used if a licence is to be issued. Please note MED's recommended changes to Cl. 3.3 of the Finfish Licence Template submitted to AFMD on 07 August 2013 (copy attached). In summary, this recommended that Cl. 3.3 be revised to read as follows (subject to any revision that may result following legal review):

3.3 The Licensee shall confirm to the Department of Agriculture, Food and the Marine (hereinafter referred to as "the Department"), by way of written confirmation by a Chartered Engineer that the to be used in the licensed site has been designed with skill, care, diligence and professional conduct reasonably to be expected from a designer with the qualifications and experience suitable for the design work involved. Any proposed material change to the equipment to be used during the licensing period will require written confirmation by a Chartered Engineer that the proposed change to equipment to be used in the licensed site has been designed in the same manner as aforementioned. The Licensee shall retain detailed records for inspection to confirm that this condition is being complied with.

Additionally, as the Protocol for Structural Design of Marine Finfish Farms is not yet available to be referenced in the Licence document, it would be beneficial to insert a condition relating to Cl. 3.3 (possibly as Cl. 3.3.1), as follows:

The Licensee shall submit the marine finfish farm detailed design and written confirmation by the Chartered Engineer in accordance with Cl 3.3 to the Department for approval prior to deployment of any marine finfish farm components on site.

Also, just to note that in order to prepare a final draft of a licence document MED will need to advise in relation to completion of the Schedules (drawings to be attached, etc.). Please advise as early as possible if this is required. MED are available to review a completed draft licence prior to issue, if required.

Regards,
Tony

Tony O'Sullivan
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From: OSullivan, Tony
Sent: 28 January 2014 13:08
To: Kelly, JohnA
Cc: McHale, John; Dillon, Noel
Subject: FW: Shot Head

John,

Noel Dillon's attendance at the Shot Head application meeting in Ag House on 23 Jan 2014 refers.

I can confirm that I have now examined, first hand, the 21 additional submissions (originally addressed to the Minister) and have no additional comments to make (see below regarding my original response on this).

Regards,

Tony

From: OSullivan, Tony
Sent: Monday, 27 January 2014

comments were forwarded to the Minister (as per the Notice) but not to the address specified. The Department is satisfied in all the circumstances that it was appropriate for these attached submissions to be considered by the Applicant as part of the general assessment process for the application.

Accordingly I am to invite you to comment on the attached observations if you deem it appropriate. Please note these observations are further to those previously sent to you. Please advise whether you wish to comment and if so, please supply observations within 3 weeks.

Yours sincerely

JohnA Kelly
Aquaculture & Foreshore Management Division
National Seafood Centre
Clonakilty.