

Questions to include in the MI submission to DAFM for consideration at a meeting with DAHG

Activities Requiring Consent

- What were listed as Notifiable Actions in previous designations seems have disappeared and it is not clear if these have been replaced by Activities requiring consent. Can DAHG provide clarity on this?
- A number of the Activities Requiring Consent (ARC) need to be clarified. More detail should be included in these lists in the intention of the ARC, its scope, and information provided on the proposed process for issuing consent, information to be included in the application and accompanying timeframes for permitting such activities. For Activities Requiring Consent, the authorities are required to consult with NPWS before licenses consents etc are issued.
 - What does this entail?
 - Will such consultation form part of the existing statutory consultation? In future are DAFM derelict in their duties if they do not consult before issuing a fishing license in the west coast SAC for instance?
- For ARC “undertaking scientific research involving the collection and removal of biological material”
 - How will it affect ongoing monitoring of the water column and seabed which is carried out for aquaculture activities which are part of ongoing business operations but isn't included in licence conditions to ensure that it is exempt for requiring separate consent from NPWS.
 - How will it affect pre application planning for developments? For example, prior to submitting an application for an Aquaculture licence and most certainly in circumstances where an EIA is required, site specific scientific research is undertaken to determine site suitability and potential impacts of development. This inevitably involves scientific surveying and sampling.
- For the Activity Requiring Consent, “Undertaking active acoustic surveys in the marine environment”
 - What does active acoustic cover in terms of surveying methodology? What energy does that cover?
 - Active acoustic surveys are an effective tool and widely used in pre-development surveying. Protocols exist for some acoustic surveys already carried out and require that a Marine Mammal Observer be present. To what extent existing or similar protocols may apply to the different types of acoustic devices utilised (from echo sounder to side scan to multi-beam) needs to be considered from sound receiving devices (hydrophones and T-pods) to active acoustic (sound emitting) devices (echo sounder to sidescan to multi-beam).
 - What exactly is meant by survey?
- For ARC “Application of herbicides and pesticides”
 - Do sea-lice and any other parasite treatments come under the umbrella of pesticides? All medical treatments are administered by an approved veterinary surgeon.
 - While a combination of fresh and saltwater washing and physical agitation are used in favour of chemical anti-foulants for modern aquaculture structures such as salmon cages, there are still situations where they are required. Is this considered as use of herbicide and pesticide?
- Based upon experience to date it would be vital that:
 - conservation objectives;
 - habitat mapping and
 - supporting information

are made available as soon as possible to ensure that the requirements of Article 6 of the Habitats Directive can be effectively applied without delay to applications for

renewal of consents and for new developments. This is particularly urgent with respect to the 2013 seed mussel fishery.

Site Specific Comments



The Blackwater Bank SAC

- What are the Conservation objectives for the qualifying interest, “Sandbanks which are slightly covered by seawater at all times”
- What is the extent of the qualifying habitat within the designated area? Are habitat maps available?