

Minister Creed,

I'm writing you regarding an issue of great urgency, where you could make a symbolic and inspiring shift to the way Ireland has dealt with its natural resources in the past.

I am writing you to express my outrage and grave concern regarding the application for shell fish farming in the Ballyness Bay SAC, northwest Donegal. As a professional ecologist, I am well aware of the tenuous and delicate nature of our natural resources in Ireland at the moment, and schemes like the one applied for represent a very short sighted and destructive approach to our natural heritage.

The State's latest assessment report to the European Commission, which must be completed every six years outlining the status of EU-listed habitats and species in Ireland, showed that 85 per cent of habitats are in an unfavourable status, of which 46 per cent are demonstrating ongoing declines. Areas like Ballyness Bay which are designated as SAC's should, in theory, be the jewels in our natural heritage and be prioritized and preserved for subsequent generations. In practice this rarely seems to be the case.

The total budget for the NPWS in 2019 is just under €14 million. In comparison, combined funding for the Greyhound Racing Board and Horse Racing Ireland this year is €84 million. That is why, unfortunately, much of the responsibility of managing our natural areas falls to the heads of ministers like yourself, and with constituents writing letters like I am now.

Ballyness SAC is a truly special place I have known since my youngest childhood. Aside from its obvious outstanding natural beauty and tourist potential, it is an ecologically unique area in Ireland. It contains populations of birds which have crashed catastrophically in Ireland (Curlew population has dropped by 96% since the 1980's, Corncrake and Lapwing are still present at Ballyness). It is a little symbolic bubble of how the rest of Ireland could have been, and could be again, if we choose to manage our natural resources better. This is why any attempt at development that threatens the ecosystems of the bay must be rejected.

The effect of aquaculture of oysters on waders, such as Curlew, in Irish estuaries is not well understood. The only study on the topic has found that "Curlew ... occurred in significantly lower numbers in the trestle area" as compared to areas where there were no oyster trestles. We do not yet have enough information to say whether ANY scale of aquaculture would have an impact on Curlew, but the proposed license area is proposing essentially covering the entire bay with oyster trestles. This is completely environmentally irresponsible, and ethically reprehensible when we have already driven the Irish population of breeding Curlew from 12,000 breeding pairs in 1981 to 128 pairs in 2019, equivalent to the human population of the Republic dropping from 4.8 million to less than 200,000 in as many years.

While this is potentially the most devastating ecological consequence at Ballyness Bay, the potential for Pacific Oyster cultivation to otherwise significantly negatively alter "diversity, community structure and ecosystem processes" in protected areas are already agreed upon. The comprehensive review linked "concludes that in view of the potential risks to biodiversity, all stakeholders ... must engage in regional decision making to help minimise any negative environmental impacts of wild settlement on features of conservation interest, while at the same time, and within those constraints, maximising opportunities for sustainable industry development."

This 'regional decision making' unfortunately has not been fairly attempted in the case of Ballyness SAC. The only publicized license applications were in a South Donegal newspaper with very limited circulation in the area around Ballyness Bay. At a recent town hall meeting over 700 local residents turned up, and only one or two had heard of the applications by chance. There has not been fair consultation with the people who's environment this decision will disproportionately affect. Its their bay, its where they walk their dogs, where their kids poke at wildlife in tidepools and get their first experiences with nature. Its not fair or ethical to take such a special place away without consultation.

I urge you in light of the severity and urgency of the above environmental issues to ensure an accurate period of consultation is reopened, now that the licenses are known about in the local area.

With outrage and optimism,

Daniel Connaghan