

Site name and designation:	Rathlin Kelp Farm
File number:	
File Type & Title:	Kelp farm
Applicant details:	Islander Kelp Ltd. Contact [REDACTED]
Brief description of proposal	<p>Islander Kelp Ltd., (formerly Ocean Veg Ireland) have grown and harvested farmed kelp under license now for 8 years at the farm site at Killeany Bay on the south facing side of Rathlin Island on shore below the chalk cliffs. The site consists of a series of ropes, currently 6, laid east to west, anchored at each end with 1 tonne anchors and chain and marked with A5 hard buoys. The anchors lie in an approximate depth of 15-20 metres. Each segment of rope (approximately 30 metres) is anchored using large boulder anchors between 300kg and marked using A3 Polyform buoys. Between each segment hard floats are tied and weighted to sink the rope to a depth of 1.5 metres. Each rope is spaced approximately 10-15 metres apart.</p> <p>The site is marked at the south east corner with an A5 buoy anchored with a 3-tonne concrete block and chain. In the south west corner, a large yellow hard-shell marker buoy with flashing light is anchored using a 3-tonne concrete block and chain.</p> <p>We propose to increase the number of ropes we have within our licenced area but do not have any plans to expand the farm area.</p>
Date Application received EMFG	
Date of Site Visit/s	
Date of Report	
Location of report	

N2K site?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Stage of Habitats Regulation Assessment undertaken:	
Stage 1: Test of Likely Significance carried out?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Stage 2: Appropriate Assessment carried out?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Stage 3: Assessment of Alternatives	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Stage 4: Imperative Reasons of Overriding Public Interest	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
ASSI Features Assessed by CDP:	Yes <input type="checkbox"/> No <input type="checkbox"/>

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Ramsar Features assessed by CDP:	Yes <input type="checkbox"/> No <input type="checkbox"/>
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	Signed:	Date:
Case officer:		
HSO:		
SSO:		

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Proposals

We propose an extension of licence on the current site to continue the growing and harvesting of kelp. Currently 6 ropes are in place, running east to west, anchored at each end at a depth between 15-20 metres to the sand below. With our current anchoring system, we haven't recorded any movement using our GPS mapping of the farm. Farming was scaled back during covid, and is just back now to its pre covid size of around 2 klms over 6 ropes. The farm site could accommodate 3 times this, but at the moment we do not have demand for more kelp.

To grow the kelp, we cultivate spores from the sorus of the native wild kelp (*digitata* and *saccharina*), sourced on Rathlin Island. These spores grow on spools of string which are then spun along the ropes in place at sea. No fertiliser or artificial feed is added to the water. This work is typically carried out during autumn and early winter months. The kelp is large enough to harvest by late spring and with good harvesting practices such as leaving stipes attached and never stripping a rope bare, we see growth year-round. We also hope this protects the aquatic habitat, any seaweed below grade i.e. unwanted species, dying, excess marine growth is returned to the water on site along with any crustaceans. Our set-up remains in the sea year-round. Each rope may work for 2 seasons until it needs to be removed, cleaned and repurposed.

On our approach to the farm we travel west from church bay at a slow pace, our vessels top speed being 10kmh, avoiding flushing or risk of collision with seabirds and marine mammals, our site is also located approximately 150 metres from shore, reducing disturbance to nesting birds, going forward Islander Kelp will record all bird and marine mammal sightings on farm visits. *Attached as appendix 2 is our monitoring form.* We have never recorded any bird entanglement, collision or deceased animals in the licenced area. When we enter the farm site, we lift the ropes using a gantry and hauler. We then pull our way along the rope and harvest by hand. At no point do we anchor our vessel on site. Maintenance is regularly carried out including cleaning floats, checking anchors and swivels, mapping, monitoring growth etc. Time spent on the site can range between 1-3 hours.

To place a rope in the farm we first place a Bruce anchor weighted with chain to a depth of 15-20 metres, we allow the anchor to bed itself, and mark it using an A5 buoy. Then we attach a 30-metre length of nylon rope with a shackle and swivel, nylon is preferred as it sinks through water. This length of rope is then anchored using a stone anchor and marked with an A3 buoy. At this point the cultivated spool is then spun along the rope. We cultivate two species, *Laminaria Digitata* and *Saccharina Latissima*, the spores of which are collected from the native wild kelp, other varieties naturally seed onto our ropes such as dulse. Weights and hard floats are attached every 5 metres, this holds the rope to a depth of 1.5 metres, the ideal depth for growth while allowing small vessels to travel over without rope fouling.

One full line may have 4-7 lengths. At the end of a line we attach another plough anchor and A5 buoy. Our lines are spread 10-15 metres apart to allow safe working distance for our boat.

We propose to increase the number of ropes on site using the same methods, these ropes will be placed to the south, alongside our other ropes. We will also continue regular visits to the site for harvest and maintenance throughout the year. In good weather conditions this could be twice weekly for 1-3 hours.

Summary of site designations

Include a brief overview of the designation(s) to which the application applies.
MCZ, ASSI, SPA, SAC

Site Records

Give a brief overview of any information held relating to the application site.
Indicate any changes in management of the land if known.

The site has been used for kelp farming since 2015. The activity has not been known to have affected the environment in any way. There have been no sightings of injured birds, mammal entanglement or any other negative impacts from the farm.

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Site visit

If a site visit was undertaken give details below.

Summary of effects on N2K features

Select an option based on the level of assessment – 1 for ToLS or 2 for AA.

1. A Test of Likely Significance has been undertaken. The Natura 2000 site is **unlikely** to be significantly affected by the proposal.
2. An Appropriate Assessment has been undertaken. The integrity of the Natura 2000 site **will not** be adversely affected by the proposal.

Introduction

In accordance with Regulation 43(1) of the Conservation (Natural Habitats, etc) (Northern Ireland) 1995 (as amended), DAERA Marine and Fisheries Division has considered whether the project, plan or proposal either alone or in combination (neither being directly connected with or necessary to the management of the site) is likely to have a significant effect on the Natura 2000 site.

As part of that consideration, DAERA Marine and Fisheries Division has:-

- a) taken into account the mitigation measures contained in the project, plan or proposal, along with all legally enforceable obligations designed to avoid environmental effects;
- b) applied the precautionary approach set out in European Commission Guidance: “Managing Natura 2000 Sites”¹ and by the European Court of Justice in C-127/02 (Waddenzee), paragraphs 56 and 59.²

“The authorisation of a plan or project may only be granted if the Competent National Authority is certain that it will not have any adverse effect on the integrity of the site concerned. That is where no reasonable scientific doubt remains as to the absence of such effect.”

- c) consulted the Department and have regard to any representations made by it within such reasonable time as the competent authority may specify for the purposes of the assessment or determining whether an assessment is required for a plan or project. This is required by Regulation 43(3), The Conservation (Natural Habitats, etc.) (Amendment) Regulations (Northern Ireland) 2007.³

Web link references for the above:

1. European Commission Guidance: “Managing Natura 2000 Sites”
http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf
2. European Court of Justice in C-127/02, Waddenzee, paragraphs 56 and 59
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62002J0127:EN:PDF>
3. The Conservation (Natural Habitats, etc.) (Amendment) Regulations (Northern Ireland) 2007
<http://www.legislation.gov.uk/nisr/2007/345/regulation/14/made>

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Stage 1: Test of Likely Significance (Screening)

Screening Matrix

Name of Project or Plan:	Rathlin Kelp Farm
File number:	
Name and location of Natura 2000 site:	Rathlin MCZ
Natura 2000 site features:	
Description of the Project or Plan <ul style="list-style-type: none"> • Size and scale; • Land-take; • Distance from Natura 2000 site or key features of the site; • Resource requirements (water abstraction etc); • Emission (disposal to land, water or air); • Excavation requirements; • Transportation requirements; • Duration of construction, operation, de-commissioning etc; • Other. 	<u>Size and scale</u> Killeany, approximately 10 acres of sea space, <u>Distance from Natura 2000 site or key features of the site</u> Site lies within MCZ, ASSI, SAC and SPA boundaries 150 metres from the cliffs and nesting birds such as black guillemot on the south shore of the island. The site is not located near any submerged seastacks, sea-caves, drift-lines, or deep seabed. <u>Land-take</u> None <u>Resource requirements (water abstraction etc)</u> None <u>Emission (disposal to land, water or air)</u> None <u>Excavation requirements</u> None <u>Transportation requirements</u> None on land, work done by 26ft kelp boat at the site. <u>Duration of construction, operation, decommissioning etc</u> Current set-up in place, increasing number of ropes by 2 will take approximately 24 hours over a number of days, each visit lasting roughly 3 hours. Operations are carried out year-round, weather dependant, site visits carried out 2 times a week lasting 1-3 hours. Ropes are removed when they reach the end of use, typically 2 seasons. Anchors remain in place and new ropes are placed in the same position. We have the resources on Rathlin to decommission the entire farm set-up
Is the Project or Plan directly connected with or necessary to the management of the site (provide details)? If yes proceed no further.	Yes. The project is the site as such it will be managed on a continual basis.
Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to effects on the Natura 2000 site.	None

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<p>N2K Feature affected (all features to be assessed at this stage):</p>	<p>Describe any likely direct, indirect effects to the N2K features arising as a result of:</p> <p>Reduction of habitat area; disturbance; Habitat or species fragmentation; Reduction in species density; Changes in key indicators of conservation value (e.g. water quality, climate change).</p>	<p>*Effect Significant/Not Significant? Explain why.</p> <p>Indirect disturbance of black guillemot and diving birds by visual disturbance and underwater noise change. Not significant as our vessel travels at low speeds far from shore where birds are nesting. No collision has ever been recorded on our site. Bird count records will be kept for each site visit.</p> <p>Our vessel activities are so minimal especially when compared with motor launches, high speed boats etc. that regularly (and increasingly) travel in Church Bay Rathlin. We may be on site about twice a week in the spring, and twice a month during seeding. The farm system is widely spread out, so not impacting light penetration in the area.</p>
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Rathlin Island SAC Features:		
Submerged or partially submerged sea-caves	Not affected	None located within site
Annual vegetation of drift-lines	Not affected	Site outside of strandlines
Reefs	Not affected	Site has no reefs
Sandbanks	Not affected	No removal of seabed
Vegetated sea cliffs	Not affected	No contact with land

[SITE NAME] SAC Features:		

***Only mitigation measures designed within the application can be considered at this stage. Any conditions that EMFG would impose must be assessed through the appropriate assessment stage.**

<p>Describe any potential effects on the Natura 2000 site as a whole in terms of: interference with the key relationships that define the structure or function of the site</p>	<p>Effect considered significant/non-significant: Finding of No significant effects Matrix</p>
<p>No effects</p>	

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Provide details of any other projects or plans that together with the project or plan being assessed could (directly or indirectly) affect the site.	Provide details of any likely in-combination effects and quantify their significance -
None	

Is the potential scale or magnitude of any effect likely to be significant?	Effects are considered likely to be significant.
Alone?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
In-combination with other projects of plans?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

List of Agencies Consulted: Provide contact name and telephone or email address.	N/A.
Summary of response to consultation received.	N/A.

Conclusion: Is the proposal likely to have a significant effect on an N2K site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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IF IT HAS BEEN DETERMINED THAT THE PROPOSAL WILL NOT HAVE A SIGNIFICANT EFFECT THEN ASSESSMENT IS COMPLETED.

IF ANY PART OF THE PROPOSAL IS LIKELY TO HAVE A SIGNIFICANT EFFECT AN APPROPRIATE ASSESSMENT WILL BE REQUIRED – STAGE 2 APPROPRIATE ASSESSMENT.

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Stage 2: Appropriate Assessment Report

Assessment of the Effects of the Project or Plan on the Integrity of the Site	
Describe the elements of the project or plan (alone or in combination with other projects or plans) that are likely to give rise to significant effects on the site (from screening assessment)	N/A No activities will have an effect on the site.
Set out the Conservation objectives of the site	[SITE NAME] SAC [SITE NAME] SPA
Describe how the project or plan will affect key species, key habitats and the integrity of the site (determined by structure and function and conservation objectives). Acknowledge uncertainties and any gaps in information.	No impact or affect on key species, the integrity of the site.
Describe what mitigation measures are to be introduced to avoid or reduce the adverse effects on the integrity of the site. Acknowledge uncertainties and any gaps in information	N/A

Appropriate Assessment: Mitigation Measures

List measures to be introduced	Explain how the measures will avoid the adverse effects on the integrity of the site.	Explain how the measures will reduce the adverse effects on the integrity of the site.	Provide evidence of how they will be implemented and by whom.
List mitigation measures (as above)	Provide evidence of the degree of confidence in their likely success	Provide time-scale, relative to the project of plan, when they will be implemented	Explain the proposed monitoring scheme and how any mitigation failure will be addressed

Data collected to carry out the assessment

Who carried out the assessment?	
Sources of data	
Level of assessment completed	
Where can the full results of the assessment be accessed and viewed?	
Response to consultation	

Appendix 1 – Site Selection Features and Conservation Objectives

Declarations

Conservation Objectives for N2K Features

Feature	Global Status	Component Objective
Reefs	A	Maintain and enhance, as appropriate the extent of the reefs
		Allow the natural processes which determine the development, structure, function and extent of the reefs, to operate appropriately
		Maintain and enhance, as appropriate, the species diversity within this habitat.
Submerged or partially submerged sea cave	B	Maintain and enhance, as appropriate the extent of the submerged or partially submerged sea caves
		Allow the natural processes which determine the development, structure, function and extent of the submerged or partially submerged sea caves, to operate appropriately
		Maintain and enhance, as appropriate, the species diversity within this habitat.
Vegetated sea cliffs of the Atlantic and Baltic coasts	B	Maintain the extent of vegetated sea cliff subject to natural processes
		Allow the natural processes which determine the development and extent of vegetated sea cliffs to operate appropriately
		Maintain and enhance, as appropriate, range of maritime rock crevice and cliff ledge communities
		Maintain and enhance, as appropriate, range of sea-bird cliff communities
		Maintain and enhance, as appropriate, range of maritime grassland communities
		Maintain and enhance, as appropriate, range of maritime heath communities
		Maintain and enhance, as appropriate, range of transitions and other communities
		No increase in status of non-native species, undesirable invasive species and species not characteristic of typical communities
		Maintain and enhance, as appropriate, status of rare and notable species

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		Monitor cliff top or near cliff management activities to ensure they do not lead to loss or enrichment of sea cliff associated communities
Annual vegetation of drift lines	C	Maintain and enhance the extent of annual vegetation of drift lines subject to natural processes
		Allow the natural processes which determine the development and extent of annual vegetation of drift lines to operate appropriately
		Maintain and enhance, as appropriate, the species diversity within this community including the presence of notable species
Sandbanks which are slightly covered by water	C	Allow the natural processes which determine the development, structure and extent of sandbanks which are slightly covered by sea water all the time, to operate appropriately
		Maintain and enhance, as appropriate, the species diversity within this habitat
		Maintain the extent and volume of sandbanks which are slightly covered by sea water all the time, subject to natural processes

Declaration signature



Kate Burns, Managing Director Islander Kelp Ltd. 1st June 2023

Appendix 2

Islander Kelp Bird Species Record

Birds

Species	In Air	On Water	On Land	Total
Guillemot				
Razorbill				
Common Gull				
Lesser Black-backed Gull				
Herring Gull				
Great Black-backed Gull				
Black Guillemot				
Other				

Comments

Islander Kelp Marine Species Record

Marine Species

Species	Sightings	Total
Grey Seal		
Common Seal		
Fish activity		
Common Dolphin		
Bottlenose Dolphin		
Other dolphin/whale		
Basking shark		
Other		

Comments

Date:

Recorded by: