Bia Mara (Déise) Teoranta

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Deirdre Morgan
Secretary to the Independent Review Group
Department of Agriculture, Food and the Marine
National Seafood Centre
Clonakilty
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Submission to the Independent Aquaculture Licence Review Group

A chara,

I wish to make some a submission to the Licence review group as follows. Bia Mara (Deise) Teo. has been growing oysters in Dungarvan Bay since the late 1980's. We produce substantial tonnage in the range of 400-500 tonnes of oysters per annum. We are also a major shareholder in Meitheal Trá na Rinne Teo. (established 1990) a marketing and sales facility providing centralised services to a number of oyster growers in Dungarvan. We employ between 20-30 people on a year round basis making a significant contribution to the local rural economy.

We welcome the establishment by Minister Michael Creed TD of the independent review group on licencing. The issue of licencing has been the greatest obstacle and impediment to the development of jobs and exports from seafood, coastal areas and the fish processing sector in Ireland for two decades now.

The industry has suffered greatly over the last 20 years or so due to the failure of the Aquaculture Licensing system to deal with new applications and renewals alike in a timely fashion. Difficulties include long term business planning, seeking of investment funds and above all the ability to secure loans from the banking system. No bank wants to hear about our 'hopes' of having a licence in a few years.

We need clarity and a clearly laid out timescale for the Application and Renewal processes, along with up to date information on where exactly an application stands in the system. We need to know from the start what information will be needed to progress the application and above all we need to be involved in the process when serious decisions are being made with regard to our applications.

Directors: M. Burke, S Burke, C. Mhic Giolla Chuda

This company recently had experience of having one of our licences taken from us (not renewed) to facilitate a 'bird corridor' without being involved in any of the meetings and horse trading that took place around this issue. This is completely unacceptable behaviour on the part of a Government Department and in our opinion constitutes a lack of due process. Natural justice demands that stakeholders be afforded the opportunity to put their case.

There is a major issue with inflexibility in the licences currently being issued. Applicants are asked to submit detailed drawings of trestles, bags and even the exact layout of lines of trestles on the shore. This is entirely impractical when dealing with a natural and varying environment. The result is that oyster growers find it difficult to innovate or to benefit from technical advances in equipment and growing methods as we are told that even minor changes to growing methods and equipment would be a breach of our licence conditions.

In summary we believe that:

Licences should be for a period of 20 years to enable long-term planning and business development.

We need a clear timeline for dealing with Licence applications. Both Department and Applicants should be clear on the deadlines involved and the documentation required. Failure to process an application by the deadline should result in licences being granted/renewed by default.

Aquaculture operators should be eligible for grant aid if their licence renewals have gone over time due to failure of the Department to process them in a timely fashion, and due to no fault of their own.

Licences need to be flexible enough to make allowances for changing technologies and husbandry methods in the industry, or there should be a quick and easy way for operators to apply for and secure minor adjustments to their licences without having to engage with the whole tortuous process again.

Finally it is frequently felt within the industry that there is a major disconnect between the Department that deals with licensing and the real world in which aquaculture operates. It would be beneficial if those dealing with licence applications had some understanding of the business and commercial environment in which we operate. This could avoid a lot of misunderstanding, mistrust and would make for improved communication between all parties involved.

Is mise,

Clíona Mhic Giolla Chuda,

DIRECTOR