

Bradán Beo Teoranta  
Cill Chiaráin  
Conamara  
Co. na Gaillimhe

Date; 9<sup>th</sup> February 2017.

Ms. Deirdre Morgan  
Secretary to the Independent Review Group  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty  
Co. Cork  
[aquaculturereview@agriculture.gov.ie](mailto:aquaculturereview@agriculture.gov.ie)

Dear Deirdre,

Submission to the Independent Aquaculture Licence Review Group

Bradán Beo Teoranta ("BBT") welcomes the establishment by Minister Michael Creed TD of the independent review group on licencing.

### **Background to BBT**

BBT was incorporated in 2012 as a vehicle to allow all of the marine licenses in Cill Chiarain Bay to be assigned by the Department of Fisheries, Food and the Marine from various entities that had historically been operating in the bay. The merit of such license consolidation was that in future BBT would be the sole operator in the Bay.

Since the incorporation of BBT, the company's level of activity has been based on the conservative re-development of the company's production at a pace that has allowed the business steadily build a platform of production that is appropriate and achievable and at the same time taking into the account the resources available to it, specifically in terms of management, site capability and environmental.

The consolidation of the marine sites into one operator in Cill Chiarain Bay has been quite successful. The employment story in regard to the salmon farming activities of BBT is particularly good. From zero employment in 2012 BBT now have 24 full time employees, all native Irish speakers living within a 10 mile radius of the BBT fish farms. BBT has not only created employment in its own company but also significantly increased employment in the Processing Plant, located in Cill Chiarain where all its farmed organic salmon is processed. The success of BBT in the industry is reflected in the success of the communities it helps to sustain. The activities of BBT injects in excess of €2.5m on an annual basis into the local economy to families in the form of weekly pay packets across the South Connemara region. This ongoing wealth creation in some of the most remote areas of Ireland demonstrates the enduring economic sustainability, which the Irish Government seeks from all sectors of the food industry.

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Registered in Ireland No: 515171

Directors: John Lowery, Seamus Mac Eochaidh, Michael Muhr (German), Micheal O'hEanaigh, Liam Roche  
Fón: +353 95 33307  
Facs: +353 95 33538

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## **Export**

Our organic salmon is much sought after in the market place with in excess of 90% of our company's annual turnover exported to our key markets in Switzerland, France, Germany, US and Canada. Irish Seafood Producers Group markets and sells our organic salmon, of which BBT is also a shareholder; see massive potential in increasing sales of Irish organic salmon in the global market place. We as Producers provide the environment to rear quality

Irish organic salmon in a sustainable and responsible manner which is reflected in the demand for the product by high-end retailers and smokers in the global market place.

## **Communities**

It is important to recognise the contribution made our companies to the communities in which they operate. The industry has invested considerable resources in its communities. Regular contributions, both in cash and in kind are made in the local area. Many of the companies shared their physical facilities with local groups and organisations. It is no surprise, therefore, to note that there is significant loyalty to this industry from within its own communities.

Please see Appendix 1 attached; Socio Economic impact of salmon farming in Connemara.

## **Issues in regard to Licenses**

From my direct discussions with other Producers they clearly exists a high level of frustration and worry within the salmon farming sector in regard to how the license system is operated presently.

The keys area that our company would like the Aquaculture Licensing Review to focus on is;

### **1. Legislation**

- Avoid a complete overhaul of the Licensing system.
- Modify the existing licensing Acts through regulation and Statutory Instruments.
- Note EU directives for clarifying any interpretation of the current licenses
- Existing Foreshore licenses should incorporate associated activities such as the laying of temporary pipe on the foreshore to for the purposes of treating fish with freshwater.

### **2. Administration of the Licensing system with the Department of Agriculture, Food and the Marine**

- Separate the compliance role with an independent Office within DAFM that will have responsibility for license applications and EIS.

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- In regard to renewals/new Applications; timeframes on critical steps and overall process similar to planning on land.
- ALAB brief to consider the integrity of the process and science that is provided in any appeal.
- Other government Agencies should and adopt and adhere to government policy. Is it correct that the government should be funding IFI who are undermining government policy on aquaculture?
- Currently Producers must hold an up to date aquaculture license and a foreshore license (as required) that are in compliance with the Habitats and Birds Directives and be fully compliant with the terms and conditions of those licenses to qualify for grant aid. Most of our Producers have applied for license renewals in 2012 and are still awaiting clarity from DAFM in regard to such renewals and therefore are unfairly denied access to vital grant aid.

**3. The License**

- Simply conditions relating to production. Base license on maximum biomass on site rather than harvested tonnage or number of smolts put to sea.
- Tenure of license should be for minimum of 20 years as long as the Producer is compliant on all aspects of the license.
- Renewal of licenses should not require a full license application. Renewals should be based on historic compliance.
- No requirement for a full EIS/NIS on renewal applications.

**4. Compliance**

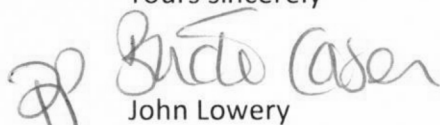
- Inspectorate to oversee issues in regard to environment, fish health and stocking.
- Marine Institute's role properly defined in respect of ecology and biology
- Engineering role should only be responsible for compliance in the area of engineering. It should not be involved in any biological issues.
- Officials dealing with compliance needs to have a better understanding/knowledge of fish farming.

Our company and many others we know would invest in rural and coastal companies involved in the aquaculture sector and would welcome the opportunities to expand our business based on a strong primary production industry.

I wish you and your colleagues the very best of luck in your determinations.

Please do not hesitate to call me at any time during the process if you require any clarity or more information on our company's submission.

Yours sincerely



John Lowery  
Chairman and Director

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## Appendix 1; Socio Economic Impact – Organic Salmon farming and Processing in Connemara

- 87 people ARE directly employed in organic salmon farming activities in South Connemara. Using Udaras na Gaeiltacha multiplier of 1.8 this gives a total employment figure of 157 relating to the activities of BBT in the South Connemara region.
- BBT and ISPG and its organic salmon farming Producers are now one of the largest employers in South Connemara.
- Safeguarding of employment and businesses in remote coastal locations on the western seaboard is critical to its economic survival
- The continued development of the aquaculture sector has a valuable role to play in the development of a positive socio-economic and creates sustained employment opportunities in remote, coastal areas on the Western seaboard.

### Annex 1.

Number of people directly and indirectly employed by fish farming in Connemara through Bradán Beo Teo:						
	No. of employees		Wage costs	Ancillary services (Estimated)		
	Direct	Indirect	Direct	Indirect	TOTAL	
			€	€	€	
ISPG, Cill Chiaran *	6		350,000	0	350,000	
Cill Chiaran – Processing Plant	40		680,000	0	680,000	
Bradán Beo Salmon Farms, Leitermore	24		620,000	0	620,000	
Derrylea Smolts Limited Recess	5		160,000	0	160,000	
O Toole Transport, Moycullen	4	4	120,000	75,000	195,000	
Net Manufacturing/Repairs Leitermore	2		65,000	0	65,000	
Other Service Providers	6	10	220,000	220,000	440,000	
<b>Total</b>	<b>87</b>	<b>14</b>	<b>2,215,000</b>	<b>295,000</b>	<b>2,510,000</b>	