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Sent: 16 January 2017 14:44
To: aquaculturereview
Subject: Aquaculture Review.....Consultation call

Follow Up Flag: Follow up
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FAO: Mary, Ken, Lorcan and Deirdre,

Further to earlier submissions on aquaculture development via other channels and oireachtas, I make the following observations, for your consideration.

Points 1,3,4 are clear objectives. Point 2 is arbitrary and untested....FoodWise 2025 and Strategic Plan are in need of ongoing review and not provably,demonstrably sustainable.

For Sustainable Aquaculture development it is important monitoring an enforcement remain transparent and under sovereign control (DAFM/NPWS/M.I./EPA/SFPA). It is important across the sectors of shellfish and finfish, within and beyond national competence and CFP that operators are accountable to national agencies.....and these functions are not farmed out to ASC, in effect self regulation by industry and greenwashing by WWF/PEW(since resigned?) in their coterie.... responsible for bogus env. awards to known offenders!!

Licence applications must be widely publicized nationally and locally with provision for appeal and oral hearings .

Cost of Appeals to Aquaculture Licence Appeals Board should be no more than Euro 10.00

Levies on industry should pay for monitoring, regulation and enforcement.

State/public and EMFF funding claw backs in addition to other penalties should be in place for licence infringements and failure to deliver. Environmental bonds should attach to licences in event of env. and community damage , reflecting real costs of repair/mitigation.

Food and waste, including sick/dead stock must be strictly controlled.

Operators must pay for fresh water and discharge of waste.

PRIORITY: In case of finfish ,feed may only be sourced from sustainable sources.

Aquaculture in it's current lawless state threatens the Origin Green brand.

All licences must be NPWS inspected and approved and an end to practice of approval on desk evaluations and meetings without inspection and env.. assessment.

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