




February 6, 2017



Independent Review of Aquaculture Licensing
C/O Deirdre Morgan – Secretary to the Independent Review group
Department of Agriculture, Food and Marine
National Seafood Centre
Clonakilty, Co. Cork
P85 TX47
Ireland

6 February, 2017

Dear Ms Morgan:

Herewith is my submission for consideration of the Independent Review Group established by the Minister for Agriculture, Food and the Marine to review the matter of aquaculture licensing.

My area of particular interest is salmon farming. I have been involved in research on salmon intermittently over 40 years, and in salmon farming for about 15 years. Over the last 20 years I have watched the Irish salmon farming industry grow and then plateau and freeze where it has remained frozen in contrast to other countries (e.g., Norway, Scotland, Faroe Islands) whose output of farmed salmon has steadily increased. The reason for failure of Irish production to grow is that existing salmon farming marine sites are saturated and applications for new licenses have not been processed for years. This is tragic as salmon farming provides excellent employment, often in rural areas where there are few jobs.

While the failure to license more sites around the Irish coast has been an opportunity lost, I greatly welcome the present initiative, and hope that the recommendations of the Independent Review Group will lead to uncorking of the bottle and open up opportunities for expansion of this important industry.

For the record, I have no financial interest in any form of aquaculture.

Yours sincerely

A Brian West



Aquaculture Licensing: Review of the Process

Legislative Matters:

Existing legislation should be retained with fine-tuning where necessary, for example in ensuring compliance with EU directives. In view of the nature of the present legislation and the time required to pass new legislation, a new act should not be considered. The license should enable all necessary foreshore components, e.g. temporary repair operations of equipment on shore, or laying hoses across the foreshore to discharge juveniles or freshwater to pens or vessels.

Process and Administration:

An independent Agency should be assigned responsibility for review of applications for aquaculture licenses, and for ensuring that they are processed in a timely manner. This Agency should have sufficient skilled staff to clear the backlog of applications initially, and in the future to prevent further backlogs from developing. It should have a published schedule of times from receipt of application by which the various defined stages of processing applications should be completed. Being involved in food production, it should be located within the Department of Agriculture. The Agency should have a routine of checking and documenting the status of all open license applications every three months, and all existing active licenses annually.

The License:

The license for finfish should be as simple as possible, with descriptive appendices that can readily be edited and updated. It should indicate the Maximum Allowable Biomass for the site, and define the operational area, which should be sufficient to accommodate cages, moorings, marker buoys, service vessels, etc. Tenure should be open ended as long as compliance is maintained, but subject to termination if non-compliant or if the license is not being used for aquaculture. License fees should be based on either Maximum Allowable Biomass, on independently certified kg harvested, or on some formula allowing for fallowing periods.

Compliance:

There are three main areas of compliance. Environment (ecology), Fish Health and Stocking (biology) and Infrastructure (Engineering and Biology). For efficiency, and because aquaculture is a biological process, all matters of compliance should fall under the aegis of the Marine Institute.

A Brian West

