

Independent Review of Aquaculture Licencing
C/O Deirdre Morgan
Independent Review Group
Dept. Of Agriculture, Food and the Marine
National Seafood Centre
Clonakilty
Co. Cork.

Catherine McManus



February 10th 2017.

Re: Aquaculture Licencing Process Review.

A Chara,

I refer to the current public consultation on the aquaculture Licencing process and wish to offer a few constructive suggestions on how to halt the demise of aquaculture in Ireland.

I have been working continuously in Irish salmon aquaculture since graduating from college in 1987. My entry into this profession was by accident rather than by design and as is the case for most of my colleagues, has become my vocation.

I welcome Minister Creed's establishment of an independent Aquaculture Licensing Review and I agree with the Minister's view that our aquaculture sector has enormous potential to sustainably grow its production. However, the only way the industry can deliver on the Government's stated policy objective of increasing aquaculture production is through streamlining our aquaculture licensing process to provide an effective and transparent regulatory framework for the industry and all its stakeholders.

While this review is critically important for our industry sector, it is only a first step. Targeted implementation of the agreed recommendations will be the measure by which the effectiveness of this process will be assessed. In the past eleven years there have been seven State commissioned reviews of the sector many of which have set ambitious growth targets to develop the sector. These reports include:

- 2006-Steering a new Course: Strategy for a Restructured, Sustainable and Profitable Irish Seafood Industry 2007-2013
- 2006-Sea Change A Marine Knowledge, Research & Innovation Strategy for Ireland 2007-2013
- 2010-Food Harvest 2020
- 2012-Harnessing our Ocean Wealth
- 2015-Foodwise 2025
- 2015-National Strategic Plan for Sustainable Aquaculture Development (NSPSAD)
- 2017-Realising our Rural Potential: Action Plan for Rural Development

As far back as the 2006 industry review report, a suite of excellent recommendations were made by the authors which included implementation of a streamlined and transparent licencing process. Thus the obvious question for me is why are we doing this again when many of the 2006 recommendations were never implemented? This report should help to inform the final recommendations.

Ireland has ideal conditions and an excellent reputation for producing high quality seafood with dedicated employees, working and living in these coastal communities. I'm confident of the massive potential of the Irish Aquaculture sector to assist in the delivery the Government growth targets if we are afforded the framework and regulatory environment to grow and develop in a sustainable way.

I would urge members of the review group to visit a number of representative aquaculture businesses in order to provide context and allow the visualisation of the resources required to culture seafood in Ireland. I'm sure that farmers would be more than happy to accommodate this.

In order to support achievement of the actions and priorities of Food Wise 2025 and the National Strategic Plan for Sustainable Aquaculture Development I think it is important to imbed these ambitions into the policy, mission and strategic objectives of the Aquaculture and Foreshore Management Division (AFMD) within the Department of Agriculture, Food and Marine. Currently the objectives of AFMD are solely focused on regulation and collection of fees as stated on their website:

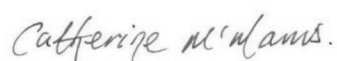
- *to develop and manage an efficient and effective regulatory framework in respect of Aquaculture licensing and Foreshore licensing of Aquaculture and Sea Fishery related activities;*
- *to secure a fair financial return from the State's foreshore estate in the context of Aquaculture licensing and Foreshore licensing in respect of Aquaculture and Sea Fishery related activities;*
- *to progressively reduce arrears in the clearing of licence applications.*

Nowhere in this division webpage, is there any stated ambition to grow and develop a fair, transparent and sustainable aquaculture industry and to maximise the long term contribution of the seafood industry to the economies of coastal regions. In addition, at state level, there must be cross-department consensus for the Government's stated policy of achieving sustainable growth of Irish aquaculture which must be supported with a defined action plan and allocated responsibility.

Marine Harvest Ireland has submitted 25 recommendations to the Licence Process Review Group which if implemented will foster an operating environment in Ireland which will begin to provide the regulatory certainty necessary to halt the demise of aquaculture and attract new investment which would meet the stated ambitions for this industry.

In the meantime I wish the Review Group every success with the task ahead them. It is a significant undertaking but one which if delivered will stand as a watershed initiative in the development of Ireland's aquaculture sector, the people it employs and the coastal communities it supports.

Yours sincerely,



Catherine McManus
Technical Manager
Marine Harvest Ireland.