

From: Damien O'Toole [REDACTED]
Sent: 09 February 2017 15:11
To: aquaculturereview
Subject: Re: Aquaculture Consultation

Follow Up Flag: Follow up
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Dear Sir / Madam,

Having previously been involved in Aquaculture for approx. 28 years, my main regret when leaving the industry was the fact that licencing remained in the same sorry state, as it was the first day I entered the industry.

While other countries hailed Aquaculture as a thriving, technologically advanced, evolving and sustainable industry, capable of making a huge contribution to feeding the world, and second only to the Oil and gas industry within Norway. The Island state that is Ireland passed the hot potato from Department to Department and from Minister to Minister, hoping no one would realise that nothing was being done to change this regulatory anomaly, while armchair scientists and the Nimby ruled the day.

Even Government Agencies (BIM) have in their recent attempt to obtain an offshore Aquaculture licence, fallen foul of this antiquated, outdated and no longer fit for purpose Licencing and Licencing renewal System.

What would I like to see at the end of this current consultation?

A simplified trial licensing process – with a tuned down EIA – to enable the discovery of potential sites in a less costly and more efficient manner. I have, during my time, seen scarce company resources (up to half a million Euro at times) squandered on Trial sites which turned out to be totally incapable of adaption for Aquaculture purposes and subsequently abandoned.

A lesser role for the likes of the Regional inshore fisheries in the process. I note with interest that they have managed a late addendum to Food wise 2025 – getting themselves strongly back into the process – (Seafood Actions 427). Such a role for an organization which has failed to have our rivers teeming with fish despite huge increases in our knowledge and understand of all things Fish and Fisheries is tantamount to placing a Hamish Community in charge of making usage of the latest technological advancements.

The review must take account of best practice such as those in Norway and Scotland.

Overall what is required is a simplified process, run by competent people, within set timeframes applied to each part of the process. I believe there are currently too many Departments involved, and none are accountable within timeframes.

The Aquaculture industry within Ireland has, despite the short comings of the licensing system, grown to be the backbone and saviour of many rural communities in Ireland. This I shall not dwell on as I am sure you shall hear from many about these contribution, enabling rural schools to remain open and part-time farmers with small holdings to remain working on their land, without the requirement to leave home for the big cities in Ireland or further afield.

The production cycle in Aquaculture can run for three to five years in often hostile and unforgiving environments, this results in a huge investment, on the part of the operators whom through best practice, endeavour to protect and safe guard the environment, as any failure to protect the environment in which their fish dwell, shall be felt first and hardest by the operators themselves.

The Aquaculture Industry in Ireland has treaded water for a long time, there is now a chance to indicate to local and foreign investors that “Ireland Inc” wishes to engage with the industry and its investors on a level playing field, for

the benefit of all. To do otherwise is to risk the hard won achievements and the benefits gained from the industry in Ireland to date, and also to restrict further investment and thus the many future benefits that the industry has to offer.

Yours etc.

Damien O'Toole