

Dungaravn Shellfish Ltd,
Hillcrest,
Gortnadiha,
Ring,
Dungarvan,
Co Waterford.

1st February 2017

Deirdre Morgan,
Secretary to the Independent Review Group,
Department of Agriculture, Food and the Marine,
National Seafood Centre,
Clonakilty,
Co. Cork



Submission to the Independent Aquaculture Licence Review Group

Dear Deirdre,

As a stakeholder and rural business with a direct interest in the sustainable development of the Irish aquaculture sector, we welcome the establishment by Minister Michael Creed TD of the Independent Review Group on Licencing. The issue of licencing has been the greatest obstacle and a huge impediment to the development of jobs and exports from seafood, coastal areas and the fish processing sector in Ireland for two decades now.

Dungarvan Shellfish Ltd has been in operation since 1985 and has grown to be one of the biggest exporter of "Speciale" oysters in Ireland. We mostly exported to France but in the last 3 years we have been purifying and packing our oysters under the "Harty Oysters" brand and are exporting 8 tons weekly worldwide (mostly to Asian markets). We employ 38 full time and 10 part-time workers and our turnover is now € 2.5 million annually (and growing year on year).

The demand for top quality oysters and other aquacultural species is growing in Asia: we believe that the Origin Green brand (that Bord Bia initiated) emphasises the high standards in our industry as well as the overall quality of our produce. Many other oyster export companies that purify and pack have also joined Origin Green and this reinforces the trust & high standards that Asian customers primarily look for. The industry has the potential to expand and the energy to do so, what is holding us back is the slow decision making on licences and future planning cannot be made whilst we must wait.

The lack of progress in putting a workable system in place, which has the confidence of all parties and stakeholders, has discouraged investment and put a huge shadow over the confidence of the industry and the reputation of Ireland to deliver top quality seafood. 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.

The place for aquaculture should always be with all other food products within the Department of Agriculture, Food and Marine – only within this department will the sector be seen for what it is – a vital part of Ireland's food export offering.

Our colleagues in fish farming have had desperate problems developing to meet market demand due to the licencing process. This is quite different from dealing with the voices occasionally heard opposing marine farming. With a correct and fit for purpose process, all opinions can and should be heard and the gradual build-up of consensus and precedent over time should lead to quicker decisions having answered questions and developed policies in a systematic way. But whether through inexperience or mismanagement, this does not seem to be the case, as each licence is dealt with individually and such is the apparent fear of making a decision in the Department that it takes years if not decades to get it through the system.

The industry needs clarity – it needs to know how long the licencing process will take and from the start what information it needs to submit instead of finding out piecemeal along the very long road laid out by the Department at present.

In summary our belief is that the aquaculture sector needs a properly managed licence system that has:

- Definite timelines – where licences are automatically granted if deadlines are missed by official bodies
- A clear and transparent licencing application process
- A minimum of a 20 year licence
- Renewals of licences based on good standing, adherence to licence conditions and monitoring results
- Release the ability to seek funding from the EMFF for updating technology and equipment
- A reduction in the cost of the extremely complex Environmental Impact Statements required – it is easier to get a licence for a sewage treatment plant or a factory than to farm fish or shellfish at present.
- More experience of the business within the department itself – similar to the knowledge contained within other sectors in relation to farming beef, sheep or dairy
- More transparency in the process for farmers and objectors alike – reducing the upset of local people who feel they are out of the loop and object because they only heard about an application at the 11th hour.

These are just some of this issues we need to see addressed and we have been waiting for action in this area for far too long. It is acknowledged that the Government and EU policy intends to develop this sector but that aspiration needs to be turned into action for the sake of the next generation.

Please do not hesitate to contact us for further input.

Yours Sincerely,



Ray Harty

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