

[REDACTED]

From: John Murphy [Administrator@fastnetmussels.com]
Sent: 10 February 2017 16:39
To: aquaculturereview
Subject: FAO; The Aquaculture Licence Review Group.

Follow Up Flag: Follow up
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FAO; The Aquaculture Licence Review Group.

Dear Sirs,

Fastnet Mussels Ltd is in the business of Farming Mussels in Bantry Bay and has endured the inefficiencies and inadequacies of the present procedures in renewal of our Aquaculture Licences.

We hold the following Licences, Nos 593,594,595,596,597,598.

We happen to be one of the lucky ones in having received the renewal of our licences in Jan 2013 all be it four years following their expiry in Jan 2009.

I believe, if without the fact that we in Bantry Bay have a Coop "Bantry Bay Fish Farming Coop" where all internal issues were addressed and agreed with the assistance and advise of [REDACTED] engineer we would still be in limbo.

Fastnet Mussels was the pioneer of mussel farming in Bantry Bay. We put out the first Mussel Raft in 1982 to test if any hydrocarbons remained in the waters following the Betelgeuse disaster in which 52 people lost their lives and the oil spill pollution that followed the explosion from the sinking tanker.

Mussel Farming has been an asset to local employment and income for families who would have normally emigrated, there are two processing plants in the area employing approx 70 people these are also supporting the local economy and schools. A positive procedure in place will ensure direct and indirect employment in some of the most peripheral areas of our country, where alternative opportunities are not always available.

Aquaculture has been good to Bantry and is definitely the way forward for the development and employment of rural communities on our coastal waters.

Unfortunately Aquaculture has not flourished in Ireland due to the resistance and delays of our Licencing Authorities in ignoring its employment potential by the unacceptable delays in the granting of Licences. People cannot hang around for years waiting for a decision from our civil servants, Aquaculture should be a God given right to farm our shores, all be it regulated patrolled and inspected by the same sector.

Irish Exports from Aquaculture are miniscule when compared to Scotland or Norway where their governments have supported the industry and enhanced it growth. Those Government policies have delivered employment in rural coastal areas, it has brought seafood exports to an all-time high and benefited the local communities with infrastructure and Security.

We have the Coast, the Water and the technology is available, but our current system needs some modifications which can be added as appendices, but definitely not overhauled and not reinvented.

At a minimum the review board must consider the following.

- 1) Set time frames, for the decision making process, right through from receipt of application to deliverance or refusal of the licence. The term of the licenses should be set for a period of a minimum of 25 years
- 2) Give the authority to BIM or Marine Institute to be the intermediate advisors to mediate on any spurious challenging issues/hurdles which could cause delays, These agencies have the knowledge, experiences and the understanding of the intricacies of the Aquaculture industry.
- 3) By creating an environment where Licenses are renewed in a timely manner and EU Funds get directed to the industry, only then will Aquaculture have any chance of achieving the targets of Food Wise 2025 and the Strategic Plan for Sustainable Aquaculture otherwise these targets are no more than a PR exercise.
- 4) The Marine Institute needs to be financed to finish the ongoing appropriate assessments of bays.

I believe when more than one EIS is a required within the same bay the first one having been completed to the required standard, further EIS requirements should be allowed use the original EIS as the base line as these are very time delaying and expensive documents. Now should a previous undertaken EIS be available this can be updated, to a set down specific specification which is fit for purpose and therefore acceptable .

- 5) Full transparency is needed in all steps of the Licencing process which needs to be robust, but fit for purpose as well as all Aquaculture schemes which are funded by the EU in association with the state. Adequate space for maintenance, servicing and the mooring systems must be addressed taking local conditions into account. EU and National Laws will further need to be incorporated in a legally robust manner.
- 6) I have seen the words “A Competent Person” being used regarding engineering services, can you please give a descriptive either by qualification, degrees, or a named listed panel to eliminate personal interpretations of who may or may not be acceptable as a competent Person.

Aquaculture has been deprived of the ability to grow we now have the opportunity to enhance and correct this wrongdoing of the last wasted 10 years.

Yours Sincerely

John Murphy

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