

# Ferguson Shellfish (Carlingford) Ltd

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## AQUACULTURE CONSULTATION

9<sup>th</sup> February 2017

### Submission to the Independent Aquaculture Licence Review Group

Dear Ms Morgan

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 impediment to the development of jobs and exports from seafood, coastal areas and the fish processing sector in Ireland for two decades now.

*Our Company has been in existence since 1984. [Our new company is now registered as Carlingford Lough Oysters Ltd – both licence renewal and new applications are under both names]. We are one of the pioneer oyster producers in Ireland. We are committed to compliance of all relevant fisheries and environmental legislation to the best of our ability. Our original licence applications were based on very old 6 inch maps and the licensed areas were drawn using 'sight lines' – pencil and ruler. They have subsequently been transposed on a number of occasions as various iterations of the licences were produced.*

*The methods used to locate the trestles and bags on the shore at the time of first granting the licences consequently had technological limitations. This meant that site location finding was rather rudimentary and this factor has compounded the mapping errors. The series of technological advances which has resulted in today's modern mapping systems were not available to us back then and I would respectfully submit that this needs to be borne in mind when evaluating our location compliance situation.*

*Over the last 35 years many changes have happened in our business and we had to adapt. For example the introduction of triploid oysters has meant a different type of farming. Also problems with Norvo Virus, Ostreavirus and the Herpes disease has consequently meant we had to adjust the location of our stock over the years. The Department are unwilling for us to allow the movement of stock under the original licence to the existing area until such time that they are removed. The relocation of our farm from the current position to the original licences would close our business. The original licences were 90% of no use as the area mapped was in deep water and can never be accessed by oyster farming techniques. Our family have lived for generations in this townland and we have been farming the current site for the last 30 years without any interference to the environment or to the local residents and it is only in the last number of years, due to technological advances, that we were made aware of this issue from the Department. We have acted in good faith at all times and are not asking for an increase in licenced areas but simply to redraw the boundary lines for the sites in use.*

The lack of progress in putting a workable system 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 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.

But 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 through the system.

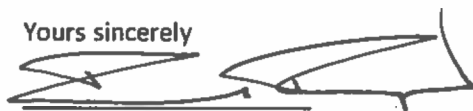
The industry needs clarity – it needs to know how long the licencing process will take place and from the start what information it needs to submit instead of finding out piecemeal along the very long road laid out by the Department at present.

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
- Released 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 sections 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 11<sup>th</sup> hour.

These are just some of the issues we need to see addressed and we have been waiting for action in this area for far too long. It is acknowledged government and EU policy 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. I can be contacted at 0876486162.

Yours sincerely



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& Carlingford Lough Oysters Ltd

By email & post