



FishVet Group

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Submission to the Independent Aquaculture License Review Group

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 licensing. The issue of licensing 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.

I am an aquatic veterinarian who has been working with most of the aquaculture sector for 11 years. I work for a company called Fish Vet Group Ireland and we provide full veterinary support for our aquaculture clients, mainly salmon farming companies. I have a particular interest in fish welfare.

Ireland is unique in that we have chosen to focus nearly entirely on organic production of Atlantic salmon. The ethos and approach of organic farming is increasingly favored by the consumer but perhaps more importantly, organic farming strives to optimize fish health and welfare. However, the lack of sites available for companies to use while in production of Atlantic salmon in this country not only places limitations on the industry, it compromises the ability to optimize welfare and health conditions for the fish.

The availability of more licenses / sites would allow full fallow periods to be enacted effectively in all bays. This would lead to very substantial health and welfare benefits for the fish, reduce or even eliminate the need for therapeutic intervention (which is already low in organic fish production) and increase the productivity and value of the stock involved.

In summary my belief is that the aquaculture sector needs a properly managed license 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 – like the knowledge contained within other sections in relation to farming beef, sheep or dairy
- More transparency in the process for farmers and objectors alike.

Yours Sincerely,

Dr. Susie Mitchell, MA MVB PhD