



FishVet Group

Independent Review of Aquaculture Licensing,
c/o Deirdre Morgan,
Dept. of Agriculture, Food & Marine,
National Seafood Centre,
Clonakilty, Co. Cork

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Re. Independent review of aquaculture licensing process

Dear Sir/Ms.,

I write to submit some observations on the aquaculture licensing process and the impact it has on aquaculture in Ireland. I have worked as a vet in Ireland (and Scotland & the USA) since 1985 when I first joined a diagnostic and veterinary service operating from the then University College Galway (now NUI Galway). I am now the Managing Director for the Fish Vet Group (FVG), which is the world's largest fish health and veterinary service provider (www.fishvetgroup.com). FVG is also part of the Benchmark Holdings group (www.benchmarkplc.com) which is a biotechnology company with a focus on sustainable food production (880 staff). Our unit in Oranmore employs 5 staff and services the national fish farming industry.

The existing licensing procedures for gaining and maintaining an aquaculture license in Ireland are complex, have no time frame guidelines and are also inflexible. These plus the lack of new salmon farming licenses being issued over the past 15 to 20 years has resulted in a number of challenges as follows:

- a) Farms have been unable to fallow sites for prolonged periods (> 6 weeks) as they have no other sites to stock their fish into. This means that young fish going to sea may share the water body with older fish in a neighbouring site and this increases the risk of infectious disease and parasite spread and accumulation. Best international practice is that the sites or water body (bay or fjord) can be left empty of livestock for a period of as long as possible (more than 6 weeks). If farms in Ireland had more sites available they could rotate livestock through these annually (as in land-farming) and maintain high standards of health and welfare.
- b) Many of the original sites licensed in Ireland were started in the 1980s before many of the technological advances in salmon farming. Some of these sites are shallow and

unsuitable for commercial salmon farming, hence alternates are needed for the sake of better fish health and welfare.

- c) The absence of new licenses being issued means that companies are unable, or have been reluctant, to invest in the equipment and support vessels needed for modern salmon farming, which also leads to difficulties when challenges such as harmful algae blooms occur, or bath treatments are urgently needed.
- d) Neighbouring countries such as Scotland and Norway now have highly successful, profitable salmon aquaculture industries. Salmon is now the largest (economically) food export in Scotland and contributes significantly to the local and national economies. For Ireland to be able to compete in the market it requires to be able to produce more salmon (and other aquaculture species) and it will only be able to do this with new licenses.
- e) The lack of flexibility on licenses means that if farms have an emergency, as from an incoming harmful bloom of jellyfish or algae, they are unable to move the livestock out of the way to an unaffected site. This can, and has in the past, resulted in farms and companies losing all their stock and closing the business.
- f) The absence of any time limits on the whole licensing process means that farmers have been waiting years for any response, which again leads to a loss of confidence for investment and for the future.

These challenges can be addressed as follows:

- a) New sites should be licensed for marine salmon farms
- b) Existing sites should be issued with long term licenses (>35 years) so businesses can plan for the future, and investment secured
- c) The licenses should be issued with an annual biomass production, rather than the number of fish.
- d) There should be specific time limits (30 days maximum) put on each Department that has to review any application, and the Departments should all review at the same time, with a responsible central unit coordinating and facilitating the process.
- e) There should be a tracking system for each application so it is clear where in the process each is.
- f) Farmers should be permitted to move stock in emergency situations (which can occur at weekends) to temporary holding sites if required.

I welcome the review and strongly recommend that for the sake of the farmed livestock, the aquaculture community and their families, the service industry in Ireland, and the national economy, that all the points above are considered in the review process.

Yours faithfully,

Hamish Rodger, MRCVS