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To: aquaculturereview; Minister; karmenu.vella@ec.europa.eu; michael.creed@oireachtas.ie
Subject: Fwd: Submission Re. Independent Aquaculture Licensing Review Group
Attachments: Gargan et al 2016 Erriff Sea Trout.pdf; Tefubenzuron threatens wildlife; CNL_16_46_TBSS_Finstad.pdf; Fitness reduction and potential extinction of wild.pdf; New research into affects of sea lice on sea trout.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Independent Review of Aquaculture Licensing
C/O Deirdre Morgan
Secretary to the Review Group
Department of Agriculture, Food and the Marine

Galway Bay Against Salmon Cages Submission on the Independent Aquaculture Licensing Review Group

My name is Billy Smyth.

I am chairman of Galway Bay Against Salmon Cages (GBASC), secretary of Galway City Salmon Angling Association (GCSAA) and I am also an executive member of the Federation of Irish Salmon and Sea Trout Anglers (FISSTA).

The following submission is on behalf of GBASC:

Galway Bay Against Salmon Cages (GBASC) wish to strongly protest not only to the make up of this so called Independent Aquaculture licensing Review Group (IALRG) but to the Minister for Agriculture, Food and the Marines plans to increase production of farmed salmon to over 45 thousand tonnes in the pristine and scenic bays along our west coast.

GBASC believe that there is a conflict of interest in the make up of the IALRG and that it is far from independent. First of all Mary Moylan is a career civil servant and may follow Government policy in regard to increasing aquaculture output. Dr. Ken Whelan was Director of Aquaculture with the Marine Institute (MI) for years and is perceived by some in the angling community in Ireland to be one of the main architects of salmon farming in Ireland and is not trusted by many Irish anglers when it comes to salmon farming issues. As for Mr. Lorcan O Cinnéide, as chairman of the Irish Fish Producers & Exporters Association, and as a Board member of the Marine Institute, he is also perceived as an outspoken cheer leader for the salmon farming industry for years.

It is shoddy politics and appointments like this that got Trump elected in the US and caused the British public to vote to leave the EU. Nobody in the US or British Government listened to what the people were telling them for years, until it was too late. The Irish angling community have been asking successive Irish Governments and the Department of Agriculture, Food and the Marine for the last 30 years not to issue any more salmon farm licences but our pleas have fallen on deaf ears.

We consider ourselves important stakeholders and on too many occasions the fin fish aquaculture industry has refused to recognize us as such and neglected to consult with fishery owners and angling clubs in affected river systems. This serious omission does not lend itself to open discussion and acceptance of our points of view on serious impacts of aquaculture on our important inland fishery resource.

There is a wide spread perception in angling circles that the proposed increase in farmed salmon production in Ireland is being influenced by the salmon farm multinational companies who have huge influence in the EU and that the EU is putting pressure on our Government to increase output.

Anglers and some Inshore fishermen that we have spoken to recently, are questioning whether we, as a country, should now follow our near neighbour Britain, out of the EU to save our wild fish stocks which include wild salmon and sea trout.

According to a 2015 survey carried out for Inland Fisheries Ireland (IFI) there are over 273,000 domestic anglers of all disciplines fishing in Ireland and a further 144,000 overseas anglers visit Ireland to fish, resulting in angling being worth € 836 million euro to the Irish economy and 11,600 jobs. These figures are extraordinary giving the fact that the majority of our country's salmon rivers are closed to taking a salmon (93 out of 149), as they are below their conservation limits, in other words, not enough fish spawn to keep a system viable. Also the majority of rivers in Connemara and along the west coast have lost their sea trout stocks due to infestations of sea lice and disease emanating from salmon farms.

Just think of the tourist angling potential we could generate if our wild salmon and sea trout stocks could be brought back to how they were in the 1960s and 70s before salmon farms were introduced in the mid 1980s.

We are not naive enough to think that salmon farms are the WHOLE cause of the decline of our wild salmon and sea trout stocks. There are a number of other problems on our rivers that need to be rectified, such as farm pollution, domestic pollution, forestry pollution, man made blockages resulting in low river bed flow, causing rivers to silt up and overgrow with vegetation. Fish cannot spawn in these conditions. Poaching and predation are also major problems on our rivers.

All these problems could be easily rectified if the angling sector was properly funded and if local authorities and Government bodies took more of an interest in an industry that is sustainable, is environmentally friendly, is good for your health and has the potential to create many more thousands of tourism jobs.

Anglers and angling interests are dismayed when we see our Government pumping millions of euro into the salmon farming industry which employs directly, only less than 150 people (BIM aquaculture survey) and a couple of hundred part time workers in processing plants, this is in stark contrast to the 11,600 employed in the angling industry which receives very little funding from government.

Salmon farming is unsustainable as it takes between 3 to 5 tonnes of wild fish to make 1 tonne of salmon feed, uses toxic pesticides to kill sea lice which damages the marine environment and kills Shrimp, Prawn, Lobster and Crab. It creates huge amounts of nutrients that can cause toxic algal blooms, causing death to many fish species. Sea lice, disease and escapes are wiping out wild salmon and sea trout. The science is available to prove all of this.

The salmon farming industry is totally unregulated in Ireland - here are a few examples. They break the regulations by over stocking, use banned toxic pesticides, over use legal pesticides, thus breaking organic certification rules, don't report escapes, take fresh water illegally from rivers and lakes without Foreshore licences or planning permission to treat Amoebic Gill Disease. Údarás Na Gaeltachta a government body, are major shareholders in a salmon farm company (Bradán Beo Teo) which is operating in an SAC in Kilkieran Bay, Connemara

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You might be asking what has all this information about salmon farming got to do with the appointment of the IALRG. The answer is that Minister Creed as part of the Government, BIM, the Marine Institute and Údarás and now the IALRG are conspiring to expand intensive salmon farming all along our west coast which will have the potential to wipe out thousands of truly sustainable jobs in the tourist angling industry and ruin the scenic beauty of our coastline for which Ireland is noted for.

The intensification of salmon farming all along the west coast will have the opposite effect to what the National Strategic Plan for Sustainable Aquaculture Development and Food Wise 2025 is trying to achieve, ie. creating sustainable jobs in rural communities. It divides communities everywhere it operates. We must learn from the mistakes of other countries such as Canada, Chile, Malta, Norway and Scotland that allowed salmon farming to expand at the expense of their wild fish stocks and their marine environment. To save jobs in salmon farming, inshore fishing and angling tourism, we recommend (again) that all open sea cages must be taken out of the sea and put on land in Closed Containment Systems (RAS). This would be a win win situation for all stakeholders.

BIM seems to be forging ahead with their plans to acquire licences for a number of 5 to 7000 tonne salmon farms along the west coast. The question that needs to be answered is, that if the proposed giant salmon farms are destroyed in storms or their stock is wiped out by disease or escape and an environmental disaster occurs, who foots the bill? As the Government would own the licences for the proposed salmon farms would it (the Government) also be the insurer of the proposed salmon farms? If so, it would be the taxpayer who will have to foot the bill should the salmon farms be destroyed or lose their stock. This is an issue that will have to be clarified by the Aquaculture Licensing Review Group.

Norway is one of the world leaders in salmon farming and has a 1,000 tonne biomass production limit and Scotland another world leader has a 2,500 biomass limit yet our Government has accepted a recommendation from the Marine Institute of a 5 to 7,000 tonne biomass for salmon farms in Irish waters. By allowing salmon farms in Irish waters to expand to 7,000 tonnes would signal that our government has abandoned any pretence to environmental protection.

If salmon farming is allowed to expand along our west coast we will have to change the wording on the Wild Atlantic Way signs to The Spoilt Atlantic Way.

I will conclude with an assessment of angling taken from IFI's National Strategy for Angling Development programme 2015.

"Angling tourism is a source of significant expenditure and development support in many rural, urban and peripheral areas across the country. This expenditure relates to accommodation, food and drink, fishing tackle, angling fees, car hire and a host of other trip expenses.

In summary, recreational angling in Ireland provides significant benefits to rural and peripheral regions whose natural angling resources attract both domestic and overseas angling participants. In many cases these rural areas may be lacking in alternative tourist attractions and, in their absence, angling provides the focus for an important and sustainable source of income for both the catering and accommodation service providers in these communities.

Recreational angling also attracts anglers at times outside of the main tourist seasons; the 'shoulder periods' of March through to May and again from mid-August through to October provide some of the best angling opportunities in Ireland and, as a consequence of this, they are the most popular angling months. These shoulder periods extend the traditional tourist season for both accommodation and service providers with the potential to also provide increased employment and entrepreneurial opportunities within these communities."

The angling industry and its value to the Irish economy has been underestimated for years. Let us not repeat the mistakes of the past by ignoring the opinions of anglers.

GBASC believe that the setting up of this so called Independent Aquaculture Licensing Review Group is a Pontius Pilate exercise so Minister Creed and the government can wash their hands after the excrement hits the fan when they start issuing salmon farm licences Willy-Nilly after all the Appropriate Bay Assessments have been finalized and published.

On behalf of GBASC

Billy Smyth
Chairman, Galway Bay Against Salmon Cages,

