

From: [REDACTED]
Sent: 10 February 2017 17:26
To: aquaculturereview
Cc: damienokeeffe@gmail.com; Mag kirwan
Subject: Review

Follow Up Flag: Follow up
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Goatsbridge Trout Farm Ltd
Thomastown
Co Kilkenny
Date 10/2/2017

Deirdre Morgan
Secretary to the Independent Review Group
Department of Agriculture, Food and the Marine
National Seafood Centre
Clonakilty
Co. Cork
aquaculturereview@agriculture.gov.ie

Submission to the Independent Aquaculture Licence 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 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.

We employ up to twenty people in aquaculture production and processing, with an overall output value of 2.5million euro. The farms have produced high quality rainbow trout for in excess of fifty years. We are happy to add our voice to that of many others in the industry regarding a gross lack of consistency in licencing renewal and new.

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 11th hour. These are just some of these 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. Attached are some contact numbers. I look forward to elaborating in confidence our personal experiences which I'm sure would qualify our concerns.

Gerard Kirwan 0862544906
Margaret Kirwan 0868188340

Yours Sincerely,
Gerard Kirwan

Company or individual name and address or headed paper

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Short description of your company/interest in aquaculture – include numbers of jobs, value of output, dependence on the sector.

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Sent from my iPhone