

From: gweebarraconservation@yahoo.com
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Gweebarra Conservation Group,
Cloghercor, Doochary, County Donegal

Aquaculture License Review Board
10/2/2017

Dear Sir /Madam,

We should like to make 3 points:

1) Under the Aarhus Convention people in Ireland are entitled to access information and to participate in decision making on matters relating to the environment. This applies to the granting of aquaculture licenses as much as any other decision affecting the environment. As such it is the law that local stakeholders have a direct say in whether such developments occur in their area and it is important that public consultation takes place before any aquaculture licenses are granted!

The Planning process does not constitute participation in decision making as laid out in the Aarhus Convention. *“Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into account in decision-making and information to be provided on the final decisions and the reasons for it” AND “the right to review procedures to challenge public decisions that have been made without respecting the aforementioned rights on environmental law in general”.*

Likewise EU Law and the Aarhus Convention requires Environmental Impact Statements to be made.

Ireland has already been fined for failing to implement the law regarding environmental impact assessment as detailed in the Aarhus Convention. Recent changes to the law regarding aquaculture licenses in Ireland are clearly breaking the law as detailed in the Aarhus Convention which Ireland signed in 2012.

2) It is imperative that any aquaculture developments in Ireland are sustainable.

To this end NO ALIEN SPECIES should be grown around the Irish coast in order to maintain the various native species. Therefore the granting of licenses for Pacific Oysters, for example, is wholly unsustainable as diseases could be introduced to native species. Private profits cannot be made at the expense of Ireland's biodiversity.

3) It appears ridiculous to us that one branch of government is spending money promoting marine tourism along the Wild Atlantic Way while another government department is promoting oyster and mussel farming in the very same areas - one arm of government appears not to know what the other arm is doing!
Again a proper public consultation process would point out the obvious to competing government departments.

Lastly the sea around Ireland is in a very precarious position - the State should be creating marine conservation areas instead of granting licenses so private companies can profit by the seas around our shores and permitting super trawlers to irrevocably damage our marine heritage and fish stocks.

Yours Sincerely,
Patricia Sharkey
for Gweebarra Conservation Group