

IRISH PREMIUM OYSTERS



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Submission to the Independent Aquaculture Licence Review Group

We are a small family owned oyster farm in the North West of Donegal. We have been in business over 25 years and currently 21 people indigenous to the local community. We are the largest exporter of oysters to Asia. Last year our output was 165 tonnes, we expect it to be closer to 200 tonnes this year. Over the last 25 years, we have grown the business from a yearly output of 2 tonne by investing and reinvesting all monies to expand the farm. But this is a very volatile sector and 1-2 bad trading years can impact any business. In particular, we are vulnerable to natural environmental threats (i.e. algae bloom). We would like to expand our business further but the uncertainty over licencing is certainly an issue that we have taken under consideration and has affected our decision making.

As a stakeholder and a 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.

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 that 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.**
- **Encourages young farmers indigenous to the community to enter the aquaculture sector and puts certain restrictions on individuals that are not indigenous to the area in getting licences.**
- **Limitations on the size of a licence issued. No farm should be applying for a licence, nor granted a licence in excess of 25 hectares. Our current output is 200 tonnes and we are one of the larger oyster producers in Ireland. We have a number of licences totalling 16 hectares approximately of which at any time we are using about 13 hectares. The licences have been accrued over 25 years and we certainly did not send in an initial application of 25 hectares.**

These are just some of this 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. My mobile number is 086 60 44478.

Yours sincerely



Edward Gallagher