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Submission to the Independent Aquaculture Licence Review Group

As a stakeholder in rural business with a direct interest in the sustainable development of the Irish aquaculture sector, I welcome the establishment by Minister Michael Creed TD of the independent review group on licensing. The issue of licensing has been the greatest obstacle and impediment to the development of jobs and exports based on seafood in coastal areas, and to the sustainable development of the fish processing sector in Ireland for two decades now.

Lurgan Green Shellfish Ltd. is a small shellfish company, established in 1991, with the aim of cultivating clams for the then burgeoning export market for clams. The company traded for many years, producing approximately 8T of clams annually, until 2010, when the effects of Brown Ring disease became evident. In 2012 the process of converting over to oyster cultivation was underway, and the first export product was delivered in 2016. Output in 2016 was 6T, and it is intended to double this output over the coming two years. Employment currently is at 1 FTE, to increase to 1.5 FTE in two years and 2FTE over the following two years. Lack of access to development grants has been the single most significant issue inhibiting progress since the renewal application was lodged.

The lack of progress in putting in place 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.

Aquaculture should rate alongside all other food products within the Department of Agriculture, Food and Marine, particularly since the change of focus from bulk exports to the export of branded retail product, particularly to markets in Europe and Asia.

The industry needs clarity – it needs to know how long the licencing process will take, 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
- A reasonable limit on the amount of additional licensed foreshore allocated to existing farmers, to prevent the emergence of large conglomerates
- A reserve of foreshore to be held for new entrants to the industry, as an encouragement to young people to develop careers.
- Consideration given to local residents wishing to participate in the development of the industry
- Renewals of licences based on good standing, adherence to licence conditions and monitoring results
- Access for the licence holder 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 project 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 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.

Yours Sincerely

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