



Marine Harvest Ireland
South West
Cork and Kerry

01-2-17

For the attention of the Aquaculture Licence Review Committee Members,

Dear Madam and Sirs.

We appreciate the opportunity to make observations regarding the Licensing of our Aquaculture business and wish ye all every success in your endeavour to facilitate change in processing the applications for aquaculture Licenses.

We are part of Marine Harvest Ireland and currently operate in both Kenmare Bay and Bantry Bay.

The Marine Harvest team here in the South West is a total of 63 staff which includes 6 full time contract divers.

Marine Harvest Ireland is a subsidiary of the Marine Harvest Group. The MH group is listed on both the Oslo and New York stock exchange and is a very strong company. The fact that we work for a very strong company, one would expect that we feel secure in our jobs. This would of course be the case if we were operating in a stable licensed business; however we operate here with no current license. We do not feel secure in our jobs.

The Department have been making excuses since 2005, in that no license application can be processed as the areas are SAC and until the appropriate assessment criteria is written for these areas then we were to wait, and then they will be in a position to process the applications. YES this is the case in bays that are SAC however Bantry Bay is **not** an SAC.

The Shot Head license application in Bantry Bay was finally accepted by the Department in 2011 and took 5 years to get out of the Department. Finally, following delay after delay the Department could no longer justify deferring a decision in favour of the applicant. Great, but the license only went from one office to the next and now sits in the Aquaculture Licencing Appeals Board (ALAB) office with over one year; and only now are ALAB kicking to touch as they are having a public Oral Hearing in Bantry West Lodge Hotel on Tuesday and Wednesday the 14th and 15th of February.

- Why, does the Aquaculture Licensing Authority “The Department” need to go through several other departments?
- Why, is there not a specific time in which these departments should reply in?
- Why, are there so many statutory consultees?
- Why, again is there not at least a specific time limit in which they should reply?

This situation must be as equally frustrating for the Department officials as it is in the Industry, when they never know when they will receive a reply, and any one of the parties can hold up the application processing time by simply not replying. Ah, but I forget the Department officials do not depend on this license to secure their jobs.

In correspondence ALAB said they will not make a decision on the license before May 2017 some 21 months later.

- Why, does ALAB feel the need to have their own EIS written when the applicant has spent a huge amount of money producing and EIS document that is scrutinised by the scientific wing of the Department the Marine Institute and the Engineering wing MED?
- Why, in the past did ALAB have a rule that if they did not process an appeal in 4 months then the applicant would be entitled to receive the license. Now they have no time limit...

The License known as Roancarrig T5 444 D&E was issued in 2005 and went in for renewal in 2015. Again this License is in Bantry Bay which is not an SAC. However we have not received anything to date regarding this renewal application. This License was written by the department under a different leadership when they did not focus on finer detail and now the present officials scrutinise the terms and conditions of all licenses looking for definitions that may be used against the operator and show a non-compliance.

- Why, because they will use these non-conformances to hold up any progress!
- Why, are our own people in the Department hell bent in penalising us ?

The reality is that if the Department was doing its job and processing license applications in a timely fashion the Licenses that we operate would cover our operations as we operate to a very high standard receiving the Aquaculture Stewardship Council “ASC” award for every one of our sites here in the South West.

As a company, we pay annually in wages and salaries in this area over [redacted] Million.
Our repairs and Capital spend to operate here is over [redacted] Million.

The above amounts would now be treble this amount if the Irish Department of the marine would just process the License applications.

Further to increasing the staff and the spend in the area we would be in a position to have a primary processing factory here in the south west because we would have a critical level of production to justify a factory. This would provide a further 40 jobs.

Can you imagine if we could have 250 employees here in this remote rural area ?? This probably equates to having creating > 4000 jobs in Dublin.

All the undersigned employees live locally; most of them have had or plan to have families in this area.

Fish Health;

Abdon Ryan Abdon Ryan
Sean Sugrue Sean Sugrue

Will Hurley Will Hurley

Admin;

Geraldine Harrington Geraldine Harrington

John Power John Power

Deenish site;

Nicolas OSullivan Nicolas OSullivan
Ted Dineen Ted Dineen
Michael Turner Michael Turner
Philip Graef Philip Graef

Paul Mc Gillicuddy Paul Mc Gillicuddy
Michael Fenton Michael Fenton
Davy Boland Davy Boland
David Coughlan David Coughlan

Inishfarnard Site;

Joe Hanley Joe Hanley
Tony Harrington Tony Harrington
PJ. O'Leary PJ O'Leary
Liam O'Shea Liam O'Shea

Donal O'Shea Donal O'Shea
Denis O'Neill Denis O'Neill
Sean Harrington Sean Harrington
Frank Hanley Frank Hanley

Roancarrig Site;

John Crowley John Crowley
Michael Murphy Michael Murphy
Michael j. Harrington Michael j. Harrington

Gerard O'Neill Gerard O'Neill
John M O'Sullivan John M O'Sullivan
Jason Harrington Jason Harrington

Conor Power, C Power
Paul Tanner P Tanner

Jack O'Sullivan J O'Sullivan

Site;

Robbie Hillard Robbie Hillard
Michael Dunne Michael Dunne
Conor O'Sullivan C O'Sullivan
Noel O'Sullivan Noel O'Sullivan

Peter Elphick P Elphick
Sean O'Sullivan S O'Sullivan
Paul Fenner Paul Fenner
Keith Stuart K Stewart

Operations Yard;

David Purcell David Purcell
Denis Hurley Denis Hurley
Sean Harrington Sean Harrington
John Blake John Blake
Gerard Mc Carthy Gerard Mc Carthy

Liam O'Connor Liam O'Connor
Stephen Harrington Stephen Harrington
Michael Sugrue Michael Sugrue
Alan Sheehan Alan Sheehan
Liam Sheehan Liam Sheehan

Harvesting Vessel MV Conquest 2;

Gary O'Shea G O'Shea
Ernestas Janduscas E Janduscas
Matthew Sugrue M Sugrue

Dean Hegarty Dean Hegarty
Andrius Norcus A Norcus

MV Roancarrig and MV Conamara;

Kevin O'Neill Kevin O'Neill
MI Harrington BB Michael Harrington
Dyllan Nolan Dyllan Nolan

Michael S. Harrington Michael S. Harrington
Billy Block Billy Block

Divers:

Declan O Sullivan Declan O Sullivan
Cormac Sidley Cormac Sidley
Ross Murphy Ross Murphy

Mark Skilling Mark Skilling
Aaron O'Boyle Aaron O'Boyle