

From: Marion Rose McFadden [REDACTED]
Sent: 09 February 2017 16:39
To: aquaculturereview
Subject: 'Aquaculture Consultation'

Follow Up Flag: Follow up
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I would respectfully submit the following suggestions to address the shortcomings in the licensing system:

1. There is a need for a full Environmental Impact Study of the areas in question and full consultation and engagement to explore local concerns.
I suggest that the fees (for the licensees) be sufficient to cover such costs as facilitating a full independent Environmental impact Assessment similar to what is currently required in France and Scotland.

This EIA should involve visual impact, the impact on nature and indigenous species that could be adversely affected by the proposed development, the tourism impact of this kind of industrialisation (if any) and any historical use of the land in question.

2. Public consultation should require the identification of the stakeholders in the area including any trusts or community organisations as well as tourism operatives in the area.
There should be legislation ensuring at least 3 open public meetings – over several months to ensure engagement with the concerns of the public (and engagement should not only include the winter months when costal areas would have second homes lying idle).

With regard to media and public engagement:

Gardaí stations have been closed in rural areas and some operate at limited hours, they are not in the least suitable for alerting the public to proposed development. Post Offices do have more footfall and traffic and can be used – as could local media channels radio and even the use of targeted social media alerts through FaceBook. One newspaper notice does not warrant a public notification. There needs to be much more emphasis made in making the community aware and that cost needs to be borne by the licensee.

Site Notices such as are currently required for building permits or septic tanks should be required and fully visible for at least 3 months prior to any rulings.

3. Details of the proposition including the infrastructure, buildings, waste disposal and job potential should be transparent in order to make a proper evaluation on the pros and cons of the proposed licenses. The licensees should be entering into agreement with the local community with respect of that action plan.

4. Protections should be in place to ensure that the licensees are in fact going to uphold their sureties and not simply sell on the licensees.
A financial surety could be sought to ensure they do not despoil the area or damage road infrastructure etc.

5. There needs to be a clear way to hold these companies and licensees to account if they do damage. This includes visual impact and waste by-product of their industry. There cannot be an onerous cost on locals to reporting and trying to hold those companies to account.

6. The current process demands a fee to appeal every license even if there are several being sought in the same area. These are onerous costs to put on locals – the appeals process should be free or only require a token amount €25 and should apply to the area rather than to the amount of licenses in that single area.
The license fee should fully support the appeals process indeed if the consultation and EIS stages have not adequately addressed the local objections the appeals process should be anticipated to recognise the concerns of the community.

7. The licenses should not be considered separately but rather as a whole development in the area for which they are proposed. It is ridiculous that each license is regarded as separate if the whole proposition is situated in the same bay and it is the cumulative effect of this industry, which will impact the local landscape!

With regard to the pre-application stages for the licence there should be a thorough submission revealing the company or individuals involved, this includes the shareholders and any connection to the community. There should be a disclosure of the stakeholders and their other concerns including bankruptcies to reveal they have the wherewithal to finance not only the development but the clean-up and on-going waste costs.

A trial licence should be the norm with a surety or escrow in place –to be reviewed after 3 years to ensure that good practice is being adhered to and that there is no damage to the foreshore, water channels or waste issues.

With regard to the review of licence or renewal there really should be an engagement process established. This would ensure that community groups can forward their concerns and complaints against the industry and that applicant should be held liable for any damage or bad-practice.

In other EU countries there are far more robust protections because they have seen their natural environment despoiled by heavy industrialisations.

Care needs to be taken with this kind of development and I urge you to err on the side of caution.

Once our costal communities are blighted then no amount of tidy town initiatives can bring back our golden sands.

It is in your power to help protect our strands and ensure development is undertaken in a socially responsible way with minimal impact on our natural environment.

In parting let me refer you to the:

Which cites:

"Examples of good practice from other countries includes the introduction of a longer licensing periods (20 years) and a Single permit system (United States) and establishment of a comprehensive best practice framework (Australia)."

The same study observed the following of our EU partners:

[In France] There appear to be a variety of reasons against

further development including limited access to farming sites, as most coastal authorities prefer to support the development of the tourism sector or to maintain free access to offshore waters rather than establish marine farms,

"In France there are requirements for impact studies, waste control and monitoring... particularly in areas where tourism is important."

...

"[In Greece] Politically, economically and socially aquaculture is often seen as a less important user and is frequently criticized as being a significant polluter of the environment, and bringing less economic advantages than tourism..."

"[In Italy] As in Greece competition with tourism is a major constraint in the coastal zone. Various environmental impacts of aquaculture - such as

the visual impact, the impact in the coastal area, the spread of biomass coming out from the cages, the attraction of other species around the cages, the mass of mud in the depths under the column of water hosting the cage as well as the restriction on fishing activities can be cited as reasons to refuse an operation, particular in highly touristic areas."

Thank you for your time and attention,
Is mise le meas,
Marion Rose McFadden
Ní neart go cur le chéile