



9th February 2017

Ms. Deirdre Morgan,
Secretary to the Independent Review Group,
Department of Agriculture, Food and the Marine,
National Seafood Centre,
Clonakilty,
Co. Cork.

Ref : Independent Aquaculture License Review Group submission.

Dear Licence Review Committee Members,

My name is Maurice Kelly and I am the HR Manager for Marine Harvest Ireland. I am delighted that Mr. Creed has initiated a review of the Aquaculture licensing process, which is long overdue and much welcomed by the industry. This review is the first ray of light we have seen from the department in several years and we hope will be more fruit bearing than previous reviews which suggested a lot, of which little was actually implemented.

I will be watching with keen interest to see if the recommendations made by the review group will be adopted, so we as an industry can aspire to the Food Wise 2025 initiative of increasing Ireland's production by 45,000 tonnes by 2023.

As you are aware, our company is a significant employer in remote, coastal locations of our Island. In Donegal we have over 220 employees, in Mayo 20 and in Cork 60 employees which have a labour bill in excess of €10 million annually and a considerable contribution to the exchequer of in excess of €2.6 million.

Our organic salmon has a three year lifecycle during which our 300 employees provide a vast array of skills and disciplines including Biological, Quality, Technical, Fish Health, Production, Processing, Administrative, Supervisory, and Management. Additionally, we engage with over 600 Irish suppliers from the service industries set up around Aquaculture, with an annual spend in excess of €15 million.

The root cause of the current deficiency in the licencing process in Ireland is the multi-agency involvement at each stage of the approval process. The process is hugely administrative where the applicant must submit hugely expensive supporting documentation which in itself is a barrier to attract any potential investor in the industry. Clear timelines and accountability need to be allocated to each phase, with sufficient time allowed for review and approval. The National Strategic Plan for sustainable Aquaculture Development 2014-2020 also identified the importance of timelines in the aquaculture licencing process. This review should identify all the bottlenecks; assess the competencies required in progressing licence applications in a time bound manner.

The current licencing process has certainly contributed to the demise of our industry which once stood at 25,000 tonnes (finfish) in 2001 to a present day standing of 15,000 tonnes. The system is obstructive to our business in terms of our ability to plan as we are not sure if we will have obtained new licences or if our current (expired) licences will be renewed or even revoked. We have a committed workforce eager to obtain full time hours per week to support their families being raised in coastal and rural locations along the west coast. However, in areas of our business we are unable to provide full time work as we do not have enough licences to produce fish 52 weeks per year, or enough licences to enable our company to further implement best practice fish health, i.e. emergency pen deployment in cases of a jellyfish invasion or to enable all in all out stocking policies for best biosecurity practices.

As the Aquaculture industry is rather unique and niche in Ireland, educational support in terms of third level education in formal aquaculture courses are not as prevalent as they once were. In the face of this adversity, the industry has turned to in-house research and development and on the job experience in order develop our processes and to train and develop our staff. Significant R&D advances in animal husbandry and welfare haven enabled us to farm salmon in a sustainable and environmentally friendly way. This has led to significant knowledge overspill which has benefited our smaller operators with whom we endeavour to work in harmony.

The current instability of the aquaculture industry in Ireland makes the attraction of talented staff very difficult; bringing talented people into an unstable industry is one challenge, retaining this talent is another. Many leave in search of stability and join an industry which offers better job security and progressive career paths.

Our industry is already well regulated by the department, our many standard authorities and by our customers to ensure we produce our finest product, Irish organic farmed salmon. The licensing system needs to be simplified with relevant, fit for purpose licenses which are reflective of modern technology.

Our industry is both extremely rewarding and challenging and in Ireland is relatively new (40 years) in comparison to our other European neighbours who have long since recognised the importance of harnessing our ocean wealth in a sustainable manner, its time Ireland joined the blue revolution.

Wishing you well with your review and we look forward to seeing real change.

Sincerely,



Maurice Kelly.
