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**mescal** &  
*associates*

CONSULTING  
ENVIRONMENTAL &  
POLLUTION CONTROL  
ENGINEERS

Independent Review of Aquaculture Licensing  
c/o Deirdre Morgan-Secretary of Independent Review Group  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty  
Co Cork

Feb 7, 2017



Dear Sirs

**Re: Public Consultation**

We are a consulting engineering firm specializing in environmental matters for the last 30 years. We recently carried out a fish farm project and noted the unnecessary long and expensive procedure to get clearance to carry out the work.

The reason for this unreasonably lengthy procedure is requirement of the central government authority to repeat checks that have already been made and cleared by the local authority. Indeed, in our case and I expect in many similar, the local authority decision was appealed to An Bord Pleanála which is a national body. The local authority and An Bord Pleanála both operate to timelines, so broadly speaking they wouldn't unnecessarily delay the process. The serious delayer on the process is the central government authority.

A successful passage through the planning process should clear the applicant to carry out his development. The central government licencing process should deal only with details of how the fish

farm operates. The environmental impact assessment procedure need only be conducted once. That is done via the local authority and possibly ,in the event of appeal, by An Bord Pleanala , . The planning process at present requires the local authority to request input from central government - Fisheries - at the planning stage. This is done. The local authority and An Bord Pleanala are therefore made aware of anything that would make the project unsafe from a fishery standpoint. There is no need , therefore , for central government to delay matters further.

Central government to date have not been clear on what they required and furthermore have not operated to a recognised timescale. It would be important for any role central government have in fish farming that they are clear on what they require and that they respond within a certain time. This concept of timely authority response is indeed becoming more universally required and accepted. Notwithstanding how central governments response times are set down this should not impact fishfarm development following the local authority / An Bord Pleanala decision.

We trust you will give due cognisance to this submission.

Faithfully Yours

A handwritten signature in cursive script that reads "Michael Mescal". The signature is written in black ink and is positioned above a horizontal dashed line.

Michael Mescal