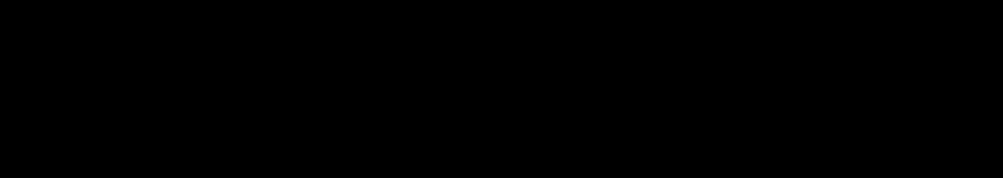


From: Hickey, John [John.Hickey@bim.ie]
Sent: 10 February 2017 14:29
To: aquaculturereview
Cc: 

Subject: Attention of Deirdre Morgan – Secretary to the Independent Review Group re: Independent Aquaculture Licensing Review - Public Consultation 2017

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Deirdre,

At a meeting of the South East Regional Inshore Fisheries Forum (SE RIFF) held at the Brandon House Hotel yesterday, the Independent Aquaculture Licensing Review - Public Consultation 2017 was discussed as an agenda item.

Resulting from the discussion at this meeting the SE RIFF unanimously wish to make the following submission below to the review;

1. We need a documented timeline for dealing with Licence applications, with clear deadlines for decisions (as is currently the case with applications for Planning Permission). If the Department fail to meet these deadlines Licences should be granted by default. Applicants would also have to submit required documents etc. in a timely fashion.
2. 20 year licences should be the norm - the current 10 year licences are not conducive to long-term business planning, investment and development.
3. The licence application process should be transparent for both applicants and observers or objectors, thus avoiding aggravation in communities who are unaware of pending licence applications and providing clarity to applicants on where their application stands.
4. Aquaculture operators currently need the Department to confirm that they are in 'good standing' with them in order for them to be able to apply for grant aid under EMFF. This confirmation should be provided to people operating under Section 19A (4) of the The Fisheries Amendment Act 1997 as amended by the Sea Fisheries and Maritime Jurisdiction Act 2006 as these are applicants whose renewals have been delayed due to no fault of their own.
5. If the licensing regime is to properly support a growing and vibrant aquaculture industry it is vital for the personnel in the Department who deal with Aquaculture Licencing to have a business understanding of the industry, as licence conditions are frequently non-conducive to business development. For example current licences make no allowances for changing technologies and husbandry methods in the industry.

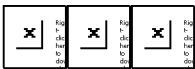
Regards,
John Hickey SE RIFF Secretariat.

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