

**From:** [REDACTED]  
**Sent:** 09 February 2017 19:47  
**To:** aquaculturereview  
**Cc:** Jerry Gallagher  
**Subject:** Re Aquaculture Review

Deidre Morgan  
Independent Aquaculture Licensing review group

Dear Deirdre

The boards of North RIFF and North FLAG have been deliberating on this review for the past month and are supportive of anything that will improve the standard of living in our area in a sustainable and environmentally friendly way.

Donegal is very dependent on its natural resources and we want to be able to exploit them in every way possible.

Fisheries and aquaculture are a major part of what we on these two boards are concerned with so with that in mind we welcome this review but only if it clearly highlights the historical failures which have brought us to this juncture and paves the way for a more user friendly system.

By that we mean why the fisheries (amendment) act 1997 and the fisheries and foreshore (amendment) bill 1998 did not produce an aquaculture licensing system fit for purpose. When one reads the speeches, which were written into the Dail record on 16th December 1998, by the then minister Dr Michael Woods TD and minister of state Mr Hugh Byrne TD, there seems to be very little reason why the long term development of the industry wasn't secured.

For the next three to four years everything seemed to go according to plan however in the intervening years since then the delivery of new and renewal of aquaculture licenses has almost ground to a halt. So the question is why?

The four headings inserted in what we presume is the terms of reference for this review group will be answered comprehensively when the group comes to terms with the historically problems in determining licenses. That said we will go through them individually.

1. Delivery license determinations in a timely manner, having regard to International best practise.

The only thing that needs to be addressed here is 'timely manner'

2. Support achievement of the actions and priorities of Food Wise 2025 in the national strategic plan for sustainable aquaculture development.

This one makes very little sense because we have missed all the deadlines set during the past 20 years plus the target date keeps moving and is generally outside the lifetime of the current ten year aquaculture licensing system.

3. Facilitate enhanced transparency in the licensing process for all stakeholders. Transparency seems to be the only relevant word in this one, so what does it mean? What has been happening is transparent enough: 'not much' but maybe your look back will shine a light through it and we can move on with something visible.

4. Ensure legal robust license determinations having regard to EU and National law This one covers all four headings and the question one might ask is, do we not already have that in our licensing system?

It is quite clear from all the Irish and International reports that aquaculture is going to be the only way in which the global demand for seafood can be met in a sustainable manner. To that end Ireland is well placed to deliver on some of our projected outputs but only if we move forward and not backwards as we have been doing in the past 15 years.

This review group has the potential to make some beneficial suggestions to the minister without substantially changing the way things are done already.

1. First of all a twenty year license is required
  2. A reasonable time frame for determination of licenses from application stage, taking into consideration International best practices, eg 6 months.
- The state already operates this model of consultation, setting time frames for a reply from stakeholders.

Sincerely

Mr Jerry Gallagher  
Chair North RIFF  
Chair North FLAG

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