

Independent review of Aquaculture Licensing Process

To whom it may concern,

My name is Sandra Schlittenhardt, and I am the veterinarian and Fish Health Manager of Marine Harvest Ireland. I have been in this position for 1 ½ years now and have been working with salmon in Scotland for the previous 3 years. I am based in County Donegal, but am frequently travelling to all our sites in the country.

Marine Harvest Ireland, like other aquaculture companies, mainly operates in rural areas without many other employment opportunities. This is especially true for the Fanad peninsula in Donegal, where the headquarters, processing and sales and several of our marine sites are based, and the company employs about 200 people. There is hardly a family living in the area that does not have at least one family member working for Marine Harvest, and there are several local businesses and suppliers that are strongly interlinked with the company.

When I first came to Ireland, I was baffled how far behind the country is in terms of licensing processes and support for the industry compared to Scotland. This is something that really holds back the development of aquaculture businesses, both in terms of production and in terms of fish health and welfare. Since I am a veterinarian, I will focus on the latter aspect and leave the business end to others.

From my perspective, it is incredibly frustrating trying to adhere to industry standards and best practises to give the fish the best possible life while the company is stuck with out of date licenses that make absolutely no sense, licenses to sites that are, quite frankly, unsuitable for aquaculture and should not be used, and new licenses to sites that have been surveyed properly in terms of currents, storm risks etc. and would have perfect salmon rearing potential not being processed for years.

For example, industry best practise recommends single bay management, meaning that only one generation of fish is reared at the same time and the entire bay is fallowed before re-stocking. This gives the sea bed a chance to re-generate and usually gets rid of any pathogens (biggest problem being sea lice) because their host is removed and they have nowhere to survive. This practise is completely impossible for some of the bays the company operates in, because fish have to be reared in 2 different year classes in order to have a steady supply of salmon and keep as many people in full time employment as possible. It is impossible to just not stock one of the sites for a year to synchronise production in the bay for years to come while the company is limited to the licenses it has, unless they want to have a major financial shortfall (fallowing one site currently equals to a loss in production of about 25 to 30%, depending on the site). As long as no licenses are granted, this situation will not change, and fish in sites with more than one year class within a bay have had major performance issues in the past.

Another issue are the licenses that Marine Harvest currently holds. Some of the licenses specifically state that one site is a "smolt" site, while the one adjacent to it is a "grower" site. Apart from the misleading terminology (there is no clear definition of the word "grower", and strictly speaking, a "smolt" is a freshwater salmon ready for transfer to sea, and should be called "post-smolt" after sea transfer, which renders a license for a marine site for "smolts" completely useless), these licenses are in direct contradiction of the recommended industry standard of single bay management. Amendments to these licenses have been applied for by the company a long time ago, but have not been processed.

I am hoping that this review will speed the licensing process up significantly, so that we can take care of our fish properly and get bay production synchronised without causing major financial losses to the company, and subsequent job losses in areas of the country that cannot afford it.

Best regards,

A handwritten signature in black ink, appearing to be 'S. Schlittenhardt', with a long horizontal flourish extending to the right.

Sandra Schlittenhardt