

Independent Review of Aquaculture Licensing
C/O Deirdre Morgan
Department of Agriculture, Food & Marine
National Seafood Centre
Clonakilty, Co. Cork

Thursday 9th February 2017

To whom it may concern,

Please find below our observations for submission to the Independent Review Group as per the guidelines of the directive listed by the Minister for Agriculture, Food and Marine with respect to the Aquaculture licensing process and legal framework. Please consider this a formal submission for your consideration and review.

PUBLIC NOTICE

The existing regulation requires the applicant(s) to publish in a local newspaper details of the proposed aquaculture development and also information to be held at the local Garda station for a period of 4 weeks.

At present this method is not only failing to inform the local communities but also causing stress in the communities. Many applications are missed, this is quite evident as per the recent media coverage surrounding Linsforth/Gweedore/Crit Island – Co. Donegal & Glenbeigh/Caherciveen – Co. Kerry to name a few. The 4 weeks window gives locals little time to collectively review all information relating to the proposed development, and, if opposition is highlighted gives little or no time to build a case for submission along with required documentation.

Due to the recent closure of many rural Garda stations the closest station can in many cases be more than 10miles away.

At present this process is imbalanced and in favour of the applicant. We propose all applications be revised to allow for:

1. Signage for 8 weeks on the foreshore in view of public traffic
2. A2 poster signage presented in Local Garda Station, Post office & Local shop
3. Public notice extended from 4 weeks to 8 weeks
4. Local newspaper publication extended to 2 consecutive weeks

TOURISM & VISUAL IMPACT

In the past 20 years many of Ireland's coastal communities have worked tirelessly at promoting tourism. Many of these coastal towns and villages now rely heavily on tourism and have expertly developed their outdoor activities from hill walking to watersports, sailing, kayaking, wind surfing, fishing, etc.

With the introduction of drone technology we are seeing more and more communities using aerial footage to promote their local landscape and increase tourism. This has been used to great effect by the likes of 'Go Kerry' and many of the top links golf courses. From an advertising point of view this footage and photography plays a large role in attracting and generating tourism

The placement of Oyster Farms on the shores of these communities, and the method of blanketing large areas with steel trestles is a major cause for concern for both residents and those involved in tourism as it causes a significant visual obstruction within the area. It changes the landscape from a natural landscape to a more industrialized landscape.

There is a responsibility on the licensing authorities to ensure that there is balance and that oyster farms are kept to areas that are not concentrated around tourism and areas where the visual impact will not be felt. Any development should be completely opposed to where the development could potentially restrict the access and usage of the strand for leisure and tourism activities.

We propose that applications are NOT entertained by the aquaculture licensing authorities for areas that have developed tourism and existing tourist activities. By NOT entertained we propose this to be effective at the initial application stage. We also propose a map of areas/zones that qualify as tourist areas be listed and made available to the public and those wishing to apply. Areas that would qualify to be listed on the map could be required to show there is tourism and tourist activities in their area

ECONOMIC IMPACT

As well as the visual impact of Oyster farming referenced above the economic impact is also of major concern. Recent studies have shown that the main reason tourists choose to holiday in counties like Cork, Kerry and Donegal is down to it's natural scenery, it's outdoor activities and ecotourism. Tourism, where already developed, must be sustained, developed and not hindered.

Proposals for introducing aquaculture to tourist areas must be accompanied by an economic impact study. From property devaluation, decline in tourist numbers, maintenance costs to shoreline and cost of damage due to use of heavy machinery. These costs can be calculated. This group proposes an economic impact study should be submitted with each application.

ENVIRONMENTAL IMPACT

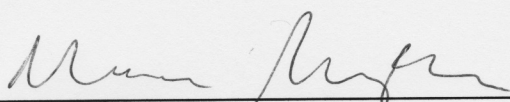
The negative impact of introducing non-native species (e.g. Gigas oysters) can not be overlooked, especially in a Special Area of Conservation (SAC). It is essential that an Environmental Impact Study be provided as part of the application as per the Aquaculture Application Regulations 1998. Why there is currently no requirement for an EIS for applications in SAC zones is unfathomable, it is essential and the only true way to meet compliance but also prove to any concerned parties that there is no cause for concern. If there is no EIS in place this will impact negatively on future planning and also has no regard for the surrounding ecosystem.

APPRAISAL PROCESS

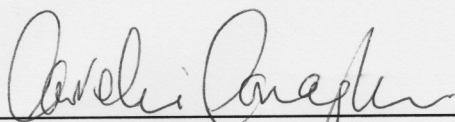
We request the responsibility for appraising aquaculture proposals, decision making and policing is held within an entirely separate organisation to that responsible for applying and managing aquaculture operations.

To conclude, please find above our observations with regards to the review of the Aquaculture licensing process. These are listed for the Independent Review Group c/o Deirdre Morgan. We look forward to your review results and proposals and expect to be informed in due course.

Signed



Maurice Murphy, Co. Kerry



Caroline Conaghan, Co. Kerry