

Zoology and Ryan Institute,
School of Natural Sciences,
National University of Ireland Galway,
University Road,
Galway, Ireland.

10th February 2017

Independent Review of Aquaculture Licensing,
C/O Deirdre Morgan – Secretary to the Independent Review Group,
Department of Agriculture, Food and the Marine,
National Seafood Centre,
Clonakilty, Co. Cork.

Dear Ms. Morgan,

We are delighted to see that the Minister for Agriculture, Food and the Marine has appointed a three-person Independent Review Group to conduct an Independent Review of the Aquaculture Licensing Process and associated Legal Framework. This is something we welcome. Please see below some insights on the aquaculture licensing process that we have gathered over the past six months as part of a stakeholder survey that we feel would be particularly relevant to this review process.

Context: Since 2008, I (Dr Tom Doyle) have worked directly with the aquaculture industry to develop mitigation measures (bubble curtains and early warning systems) to minimise negative impacts of jellyfish on the salmon aquaculture industry. More recently, my colleague Dr Margaret Flaherty has conducted a stakeholder survey (face-to-face semi-structured interviews) of the Irish aquaculture industry (finfish and shellfish) to determine their understanding of the potential negative impacts of climate change as well as current issues facing the industry. This survey is part of a H2020 project called CERES (Climate change and European Aquatic RESources) that aims to understand how climate change will influence Europe's fish and shellfish resources and how industry can adapt to and benefit from future change. As part of the stakeholder survey, participants were asked to rate current "concerns for aquaculture in Ireland", to rate "projected climate change impacts that may have a negative impact on aquaculture", and to identify potential barriers and solutions in adapting to possible climate change impacts. The majority of the participants ranked the licensing process as an issue for the industry (for 85% of respondents it was one of the top 3 issues and 41% had it as their top concern). Many of the survey respondents (37%) highlighted the current licensing process as prohibitive in adaptive strategies to climate change impacts.

What follows is a summary of the participants concerns and issues relating to the licensing process. We have categorised these concerns into four main issues:

- **Application process**

The participants felt that the application process is very long and complicated (up to 10 years to grant or renew a license) with numerous agencies involved. Participants believed



that sometimes the EU conservation designations (SACs and SPAs) are being used as an excuse to hold up the granting of licences even though the areas were designated with the farms already in-situ. Participants also felt that the onus is on the producers to pay for an Environmental Impact Assessments for the application process, which can be very costly.

- **Operating without a license**

The participants stated that as a result of the delays in granting licenses, many farms now operate without a license. This has implications for the success of the farmer's business; prohibiting access to capital (e.g. bank loans/grants) and issues relating to farm standards expected by supermarkets i.e. buying products from unlicensed operations.

- **Conditions set out in licenses**

The participants stated that there are very strict conditions set out in the licenses once they have been granted. Licenses are very inflexible and do not allow for adaptability of operations i.e. producers cannot incorporate new best practises or new technologies. Adapting to changes in environmental conditions is not possible. Scaling up the business in response to market demands (e.g. increasing production) or for the more efficient running of farms (e.g. fallowing) is also not facilitated within the licenses granted. When combined with the short term nature of the licences (10 years), it means that business development is prohibited.

- **Licensing authority**

The participants stated that there appears to be a lack of understanding of the aquaculture industry by the licensing authority. In addition, stakeholders believe that there is no drive to ensure the success of aquaculture in Ireland, and the authority is only seen as a regulator and not interested in successful development. Participants also perceive an apparent negative perception of aquaculture by those in the licensing authority. Some participants also voiced concern about the density of farms within some production areas, with some bays having too many licensed operations i.e. beyond sustainable levels. Stakeholders once again stating that it highlights a lack of understanding of the industry by those within the licensing authority.

So while our stakeholder survey set out to quantify the current state of Irish aquaculture industry and how the threat of climate change is perceived, it clearly identifies that the industry has many issues with the licensing process. We hope that our insights provided above are useful to the Independent Review Group and we would be very happy to discuss them in more detail.

Yours sincerely,

Dr Thomas Doyle &

Thomas Doherty

Dr Margaret Flaherty

Margaret Flaherty

Additional information on stakeholder survey: Face-to-face semi-structured interviews were undertaken since the end of July 2016. To date 27 persons have been interviewed representing a wide perspective of the aquaculture industry, including 16 producers, 1 researcher, 4 biologist/ecologists, 3 involved in aquaculture development, 1 processor, and 1 farm employee.