

Independent Review of the Aquaculture Licencing Process

This submission is based on my frustration with the existing management of Aquaculture and Licencing in Ireland. Because this industry has so much potential, it's frustrating to have to depend on those with no vision to dictate the pace of developing aquaculture in Ireland.

If we only look at the progress made in aquaculture in the past decade then we have to use the term regress instead of progress. Aquaculture production is falling but spin is increasing. Massaging the figures is the new skill but there isn't going to be any happy ending in aquaculture unless there is immediate change in licencing.

Am I a Stakeholder? I depend on aquaculture to earn a living and in turn to feed and provide a home for my family. I depend on Aquaculture for the continued employment of my long term loyal employees. I have been sea fishing and basically running my own business since 1980 and specifically in aquaculture since 1997. "Diversification" was the mantra in 1997 and in Donegal a Jobs Taskforce was set up in the wake of the closure of textiles giant Fruit of the Loom. In 1997, aquaculture was not bankable and I had to sell my home at that time to invest in an aquaculture project. This project was very successful and capital investment along with research and development since has been in the region of €8 million. To answer the opening question, Yes. I am indeed a stakeholder! But what weighting do my views and opinions have in the licencing decision system? Does one "Eco Warrior" cancel me out?

I have travelled extensively throughout France, Spain, Uk (mostly Scotland), Netherlands, Denmark and Norway over the past 30 years carrying out research and marketing. On aquaculture, Ireland just doesn't compare. Ireland's potential is great but not being realised. This is no disrespect to all the people working hard in this industry but if this were primary school then we would still be stuck in junior infants.

The present licencing situation,

Backlog of over 600 Aquaculture licence applications and counting. The situation has regressed since 2011 yet the previous Minister Coveney made aquaculture a priority. If, after 6 years of urgency and prioritisation licencing has regressed to the present situation then what or where next?

Potential of Aquaculture

The potential of aquaculture is unknown, but at least a generous multiple of what exists presently. Let's set an initial target of 2000 jobs in production and downline processing. First sale of sea caught fish in Ireland is around €500 million. Other countries are now producing more seafood from aquaculture than wild caught fisheries so Ireland should set a target of €500million for aquaculture production. Some aquaculture production such as salmon farming integrate with by products from the pelagic processing. This would be a win-win in the Irish context.

Some of the problems to be addressed for Irish aquaculture

- Processing or renewing of licence applications not being prioritised.
- No sanction on departments or agencies for non-performance on licencing.



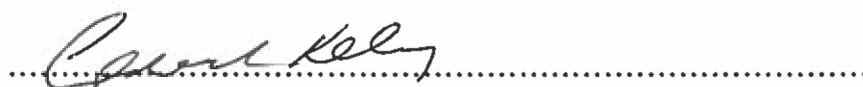
- Department staff navel gazing searching for impediments to licence and paralysed by fear of environmental angels.
- Inordinate delays in licencing and stale thinking of department officials undermine any confidence from investors.
- Talented people with skills and knowledge are leaving the industry out of frustration and lack of progress. Perhaps this is the result DAFM are actually looking for. Is aquaculture just to be an aspiration of the department but at all costs avoid any actual aquaculture activity? Aquaculture on a desktop!
- Perception that Irish Nationals are being kept at the back of the que in having their aquaculture licence processed. Is it a case of "Irish Need Not Apply". Perception that DAFM use the licence process to curtail any dissent towards department or officials.

Suggestions

- Licencing must have a one stop shop. Licencing must be progressed along practical time lines. Any deferring like further information efforts to kick the can down the road must be identified by an industry overview and removed from the licence board's toolbox.
- Any staff to be involved in Licencing should spend a period (6 months) shadowing and working with officials based in a country where that specific industry excels. This should then be followed up by having the Irish Official shadowed back in Ireland by the colleague they had worked with abroad .Let our officials discover another point of view from those who have excelled within the same environmental constraints as Irish aquaculture. Ireland has fared terribly with developing and licencing aquaculture. Any official in this section shouldn't boast of their many years of experience. It's quite apparent they only have many years of the same experience. New thinking and new people are needed. There is no expertise to be lost in this sector. Let's see how other countries can comply with environmental laws and thrive and then let's copy it immediately.
- Every application should have their file accessible and all the side notes attached. Every application should have a person allocated to it and a league table established on who is getting the work processed. Reward competence replace the incompetent.

Wholistically and environmentally, aquaculture is not about being allowed to break eggs. It's about rearing chickens. There must be some in the department who realise the potential of aquaculture for the Nation. Please decide soon whether aquaculture is to be developed or shut down. We are almost out of time, patience and market.

Yours Sincerely



Gerard Kelly, Greencastle, Co, Donegal (3/2/17)

Tardrum Fisheries Ltd & Fresco Seafoods Ltd