

The Oystermens
Seecrin Bush Riverstown
Dundalk Co Louth

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Submission to the Independent Aquaculture Licence Review Group

As a stakeholder and rural business with a direct interest in the sustainable development of the Irish aquaculture sector we welcome the establishment by Minister Michael Creed TD of the independent review group on licencing. The issue of licencing has been the greatest obstacle and impediment to the development of jobs and exports from seafood, coastal areas and the fish processing sector in Ireland for two decades now.

I have been oyster farming for more than 30 years, it is what I love and can do very well, and because of this I am delighted to say that a few years ago I started my own oyster farm. At the moment I work this farm myself with some help from my partner and we hope to build this farm into a profitable family business and also creating more employment in this area. Unfortunately it is quite difficult to do this since I have applied for licence areas to grow my oysters on and I seem to be waiting an indefinite length of time (years) before I will find out if my applications have been granted. Meanwhile it is illegal for me to work on these applied for areas, the application process is running into years with no definite time scale I now find it very difficult to comprehend and as a result my confidence in working this oyster farm is deteriorating. Starting a business is a hard task in itself and I think one step of starting a business is sourcing the best location one can find. This is what I have done but waiting this length of time for a final decision for my licence applications to be granted is something that I initially thought would be a straight forward part of the process, and yet I have laid my cards on the table, putting my trust, my future my families future out there in the hope to create a successful oyster farm and a safe future but I find myself waiting and waiting for a professional and realistic response. I started this farm for my family when my children were very young and while I watch them grow and they have grown, I see my farm has not.

The lack of progress in putting a workable system which has the confidence of all parties and stakeholders has discouraged investment and put a huge shadow over the confidence of the industry and the reputation of Ireland to deliver quality seafood. Our company and many others we know would invest in rural and coastal companies involved in the aquaculture sector and would welcome the opportunities to expand our business based on a strong primary production industry.

The place for aquaculture should always be with all other food products within the Department of Agriculture, Food and Marine – only within this department will the sector be seen for what it is – a vital part of Ireland's food export offering.

But our colleagues in fish farming have had desperate problems developing to meet market demand due to the licencing process. This is quite different from dealing with the voices occasionally heard opposing marine farming. With a correct and fit for purpose process, all opinions can and should be heard and the gradual build-up of consensus and precedent over time should lead to quicker decisions having answered questions and developed policies in a systematic way. But whether through inexperience or mismanagement this does not seem to be the case as each licence is dealt with individually and such is the apparent fear of making a decision in the Department that it takes years if not decades to get through the system.

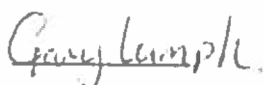
The industry needs clarity – it needs to know how long the licencing process will take place and from the start what information it needs to submit instead of finding out piecemeal along the very long road laid out by the Department at present.

In summary our belief is that the aquaculture sector needs a properly managed licence system that has:

- Definite timelines – where licences are automatically granted if deadlines are missed by official bodies
- A clear and transparent licencing application process
- A minimum of a 20 year licence
- Renewals of licences based on good standing, adherence to licence conditions and monitoring results
- Released the ability to seek funding from the EMFF for updating technology and equipment
- A reduction in the cost of the extremely complex Environmental Impact Statements required – it is easier to get a licence for a sewage treatment plant or a factory that to farm fish or shellfish at present.
- More experience of the business within the department itself – similar to the knowledge contained within other sections in relation to farming beef, sheep or dairy
- More transparency in the process for farmers and objectors alike – reducing the upset of local people who feel they are out of the loop and object because they only heard about an application at the 11th hour.

These are just some of this issues we need to see addressed and we have been waiting for action in this area for far too long. It is acknowledged government and EU policy to develop this sector but that aspiration needs to be turned into action for the sake of the next generation. Please do not hesitate to contact us for further input. Mr. Gary Lamph, 042 9397611 of my partner Ms. Charm Louet-Feisser 087 750 4888.

Yours Sincerely,



Mr. Gary Lamph

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