From: Enda Conneely

Sent: 10 February 2017 14:17
To: aquaculturereview

Subject: Submission to the Independent review of aquaculture licencing.

Follow Up Flag: Follow up Flag Status: Flagged

Submission for consideration by the Independent review of aquaculture licencing.

The objectives of this review are overdue.

I would point out the following in relation to this review.

- It is a very tall order for three people to provide adequate advice, there should be a broader base to this group that would include other stakeholders. I feel that any advice may be challenged based solely on the narrow base of the advisory panel.
- Ireland has been remiss in its obligations to implement proper regulation in relation to aquaculture projects and has focused too much on Salmon Farming. Instead of leading the field in quality aquaculture, the argument seems to be to hold up Norway as an example of where we should be in relation to this particular industry. Norway produces a commodity product, Ireland has proved that despite a lax attitude to regulation and licencing, and vast amounts of public funding both to feed, production, processing and marketing, this industry is still unable to thrive in our waters.
- The feed inputs required for Salmon in particular are not sustainable when compared with requirements for other species.
- Clear guidelines and processes, based on actual realities need to be put in place. There are many issues of spatial planning and use of public resources for the benefit of the public as opposed to the benefit of corporate interests that need to be incorporated in any new system.
- Conflicts in small communities as a result of the imposition of Salmon farming operations are a negative influence. The impacts on sea trout, wild salmon, shrimp, lobster, crab and other wildlife are very serious as is the loss of fishing areas to marginalised operators. These and other impacts need to be seriously considered here.
- Promoting an industry that leads to the loss of another is not a wise course of action.

Kind Regards

Enda Conneely