

# SEAMUS McDAID & Co.

CHARTERED CERTIFIED ACCOUNTANT  
REGISTERED AUDITOR

Riverdale House, 11 Riverdale Park, Straboe, Buncrana, Co. Donegal.

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Our Ref: 9<sup>th</sup> February 2017  
Your Ref: Deirdre Morgan  
Secretary to the Independent Review Group  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty  
Co. Cork  
[aquaculturereview@agriculture.gov.ie](mailto:aquaculturereview@agriculture.gov.ie)

Tel: 074 93 22496  
086 6086521  
Fax: 074 93 22609  
Email: [smcdaid@seamusmcaid.com](mailto:smcdaid@seamusmcaid.com)  
Web: [www.seamusmcaid.com](http://www.seamusmcaid.com)

Dear Madam,

## **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.

We are an accountancy practice base in Rural Donegal and have first hand experience of the challenges faced by clients in the aquaculture sector due to the licencing issues and the affect that this issue is having on the sustainability, expansion and value added of client businesses in this sector. We have number of client businesses in the sector supporting in excess of 50 direct production jobs and numerous indirect jobs in the direct service sector, including our own, and numerous families and jobs in the wider community , through the spend from the wages of the direct employees and service providers.

In addition to the existing benefits we believe there is significant opportunity to add additional high value employment in the branding and marketing sector of this industry, but this is hampered at the moment through inconsistent supply issues arising from the uncertainty of the current licencing arrangements.

In a small rural area such as north Inishowen, the impact of sustainable production jobs as outlined above cannot be underestimated in terms of keeping the community vibrant and we fully support the efforts and achievements of the aquaculture industry in this area.

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 client companies 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 the aquaculture industry 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.

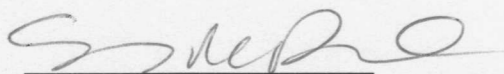
The industry needs clarity – it needs to know how long the licencing process will take place and from the start what information it needs to submit instead of finding out piecemeal along the very long road laid out by the Department at present.

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 than 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 11<sup>th</sup> hour.

These are just some of the 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.

Yours faithfully



**SEAMUS MC DAID & CO**