



2<sup>nd</sup> February 2017

**Independant Review of Aquaculture Licencing**

c/o Deirdre Morgan – Secretary to the Independant Review Group  
Department of Agriculture, Food & Marine  
National Seafood Centre  
Clonakilty  
Co Cork

**Aquaculture Consultation**

Dear Ms Morgan,

Please find in the following pages my submission for consideration of the Aquaculture Review Group established by the Minister for Aquaculture, Food and Marine to review the process of Aquaculture Licensing.

I have no current business link to the Aquaculture Industry, but my main career was in the establishment of a salmon farm business in North Donegal in 1979. This company started as Fanad Fisheries Limited financed with private Irish equity. A joint venture with salmon farm leaders in Norway a/s Mowi in 1981, led to the current leading salmon group Marine Harvest Ireland (MHI). MHI currently produces about 80% of Ireland's salmon production, with 275 employees mainly in Co Donegal

I am very proud of the strong legacy of highest quality standards and ethical practice which MHI operates under today. But I am very aware of the frustration of MHI management, relating to the aquaculture licence logjam which has stifled the industry in Ireland for far too long, while neighbouring countries, Norway and Scotland have expanded greatly.

The salmon aquaculture industry has matured with dramatic strides in fish health management and more robust marine enclosures.

I am hopeful the Independant Review Group will recommend appropriate changes in the Aquaculture Licencing Process that will allow the industry to shake of stagnation and to grow and prosper into the future

Yours sincerely,



## Aquaculture Consultation

From: [REDACTED]

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## Independant Review of Aquaculture Licensing Process

### **Legislation:**

The current legislation should be maintained with some key modifications in regulations and Statuary Instruments.

The relevant EU directives should be complied with.

The Foreshore Licence plus all permissions for associated activities as required by best practice aquaculture operations should be included in the local Aquaculture License.

### **Process and Administration:**

There must be an Independant Agency with appropriate resources and skills to define the standards of Environmental Impact Statements and License Applications.

Compliance monitoring should remain with the DAFM Centre in Clonakilty, while Aquaculture Licence Authority should be separated but retained within the Dept of Agriculture, as this is food production.

Timeframes should be clearly defined on all critical steps and overall process including site planning. There must be deadlines implemented as in the Act.

Define parameters for Aquaculture Licensing Authority within its scope, which should not include planning permission or effluent discharge licence.

ALAB (Aquaculture Licence Appeals Board) brief should be to consider the integrity of the process and the science provided, rather than approaching science from first principles.

Other agencies should adopt and adhere to government policy on aquaculture.

### **The Licence:**

Should consist of a Maximum Allowable Biomass plus defined operational area to allow for cages feed barges and moorings.

Should be as simple as possible referring descriptive appendices and to be flexible for updating.

Tenure should be as long as possible, suggest 20 years but essentially open ended as long as compliance is well managed.

Once fit for purpose, straight renewals based on historic compliance, without need for new EIS or NIS in SAC areas.

There is scope for 'carrot and stick' (percentage MAB decreases for non compliance, restored when perfectly compliant)

**Compliance:**

Environment: Ecology Marine Institute (MI)

Fish health & stocking Biology Marine Institute

Structural Engineering Marine Engineering Division (MED)

Currently MED has a disproportionate role for what is a biological business. MI role needs to be more formally in place.

Licence fees should be based on MAB granted, or kg harvested ( certified by financial auditors) or a combination of both eg some fees for fallowing period, higher fees when harvesting for sales.