



United Fish Industries
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Independent Review of Aquaculture Licensing
C/O Deirdre Morgan – Secretary to the Independent Review Group
Department of Agriculture, Food and the Marine
National Seafood Centre
Clonakilty, Co. Cork
P85 TX47

31st January 2017

Re: Aquaculture Consultation, Submission by United Fish Industries

A chara,

United Fish Industries (UFI) interacts in two ways with Aquaculture. UFI produce Marine ingredients which are used as feed materials in the production of Salmon feed. UFI have business units which specialise in the processing of Aquaculture by - products to produce feed materials for food producing animals such as pig and poultry. An increase in Salmon farming may help our business grow.

While as a business we support aquaculture and the growth of aquaculture, we also support fair and transparent licensing procedures and practices which allow for reasoned engagement from locally impacted communities, stakeholders and businesses.

Our submissions are as follows:

1. The state should confirm that it is committed to Aquaculture development. Employees and agencies of the state should follow that policy and implement the commitment. The state needs to operate a functioning licensing process for considerate sustainable aquaculture management.
2. Statutory timelines should be enshrined in the licensing process. These should be modelled on the existing Environment Protection Agency (EPA) licensing process or similar. There should be certainty of when a decision will be arrived at or at least can be expected.
3. Potential consequent appeals should be dealt with by an adequately resourced and managed Appeals Board.
4. As the area of Aquaculture licensing is no doubt complex and technical, a dedicated technical team, perhaps modelled on the EPA licensing team, should be developed within the auspices of the Department of Agriculture, Food and Marine. This would enable specialised technical knowledge and interests of stakeholders, to be developed and harnessed, so that best decisions are arrived at. This team should be free from influence and interference and suitably managed and resourced.
5. The Irish industry should be put on an equal footing with other EU & EEA states by utilising the primary license parameter Maximum Allowable Biomass (MAB).

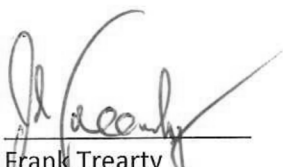


United Fish Industries is a registered business name of United Fish Industries Unlimited, registered in Ireland, No. 8639. Registered Office: Donegal Road, Killybegs. Directors: Arnt-Ove Hoddevik (Norwegian), Frank Trearty, Michael McEllone. Company Secretary: Michael McEllone.

6. The conclusions arrived at by the independent review committee should be enacted under current and existing legislation, the minister has the power to expedite matters to the benefit of the national interest. This process should not take longer than necessary.

We wish you well with your endeavours.

Is mise le meas,

A handwritten signature in black ink, appearing to read 'Frank Trearty', written over a horizontal line.

Frank Trearty
COO UK/Ireland

United Fish Industries
Donegal Road,
Killybegs,
Ireland