

From: Bryan Deegan (Altemar Environmental Consultants) [bryan@altemar.ie]
Sent: 10 February 2017 15:52
To: aquaculturereview
Subject: Aquaculture Consultation

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Dear Deirdre,

I am an independent marine biologist/ environmental and GIS consultant that has been operating in Ireland since 2001. I am the co-author of several of the Status of Irish Aquaculture reports (2004-2008) and have acted as an independent technical advisor to ALAB on 5 appeals, as well as working for the EPA, Heritage Council, IFI, NPWS etc.

From my involvement in the licencing process to date it appears that initial vetting of licence applications by the Department including its assessment of potential environmental impact, is not supported by objective and relevant marine spatial planning/GIS constraints analysis or, by a practical and detailed site specific environmental assessment. It is felt that the assessment of potential significant environmental impact is based on a general assumptions rather than identifying local site specific sensitive receptors, which surface during the appeals process. If licences could be objectively assessed, particularly in relation to a rapid, but detailed, desk based GIS based environmental constraints assessment, at an early stage, it would allow for a 2 way discussion with the party submitting the application and allow for a modification of the proposed plan to reduce/eliminate potential impacts prior to licencing/refusal of the application.

Kind Regards

Bryan

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