



No. 6, The Cottages  
Drumaveg  
Moycullen  
Co. Galway  
Ireland

[contact@irishseaweed.com](mailto:contact@irishseaweed.com)  
[www.irishseaweedconsultancy.com](http://www.irishseaweedconsultancy.com)

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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)

### **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 licensing 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, as directors of the Irish Seaweed Consultancy Ltd. (ISC) would like to take this opportunity to voice our concerns regarding the current aquaculture licensing situation in the hope that our contribution will encourage the development of an improved license application process in the near future. Currently a small SME with 5 employees, the ISC is actively involved in the aquaculture sector through the Irish seaweed industry, providing a wide range of services to these stakeholders through algal biomass surveys, seaweed aquaculture advice and trials, product evaluation, education and outreach programmes, to name a few activities. Specifically, our background in algal research places us in a unique position to assist a considerable number of companies who are looking to transition from the use of wild seaweed resources to more accessible methods provided by aquaculture production. We champion the sustainable aquaculture technique of Integrated Multi-Trophic Aquaculture where possible.

The lack of progress in putting a workable system that has the confidence of all parties and stakeholders has discouraged investment and cast a huge shadow over the confidence of the

industry and the reputation of Ireland to deliver quality seafood. Our company 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.

However, our colleagues in fish farming 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.

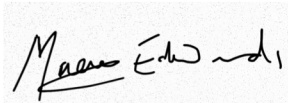
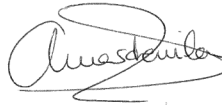
The industry needs clarity – it needs to know how long the licencing process will take place and from the start what information it needs to submit instead of finding out piecemeal along the very long road laid out by the Department at present.

In summary our belief is that the aquaculture sector needs a properly managed licence system that has:

- Definite timelines – a maximum of 9 months from initial submission to final decision.
- A clear and transparent licencing application process, ideally using an online submission tool that ensures all documentation is correctly entered and uploaded before submission.
- A minimum of a 20-year licence.
- Renewals of licences based on good standing, adherence to licence conditions and monitoring results.
- Faster approval of new or existing licenses for more benign/beneficial forms of aquaculture such as seaweed culture or finfish aquaculture employing improved methods such as IMTA in recognition for best environmentally sustainable practices.
- Trial research licenses (specific to National and European funding), with waiting timelines max. of 3 month that helps research to advance on issues that are finally beneficial to the industry and society.
- An improved ability to seek funding from the EMFF for updating technology and equipment or environmental research for the benefit of the whole industry in conjunction with the following point:
- 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 and associated biological and environmental science / impacts 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 last moment.

These are just some of this 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 are required 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 sincerely,

A handwritten signature in black ink that reads "Maeve Edwards". The signature is written in a cursive style with a horizontal line underlining the first name.A handwritten signature in black ink that reads "Anna Soler-Vila". The signature is written in a cursive style with a horizontal line underlining the last name.

Drs. Maeve Edwards and Anna Soler-Vila  
Co-Directors  
Irish Seaweed Consultancy Ltd.