

**Submission on Marine Salmon Aquaculture Licenses**  
***Independent Review of the Aquaculture Licensing Process***  
***And Associated Legal Framework***

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**Overview**

An overhaul of the aquaculture licensing procedure is long overdue. Efficient aquaculture production requires a pristine environment, so it is in the interest of all stakeholders that impacts are kept to an absolute minimum. In my opinion, the current licensing system is not conducive to best practice and is counterproductive to achieving this goal. The current system is sub-optimum and makes the production of high quality aquaculture produce very difficult. As a consequence, the system does not provide the best protection to the wider environment.

Aquaculture facilities require adequate space to operate crop rotation on a continuous basis, so as to maximise survival and performance, and thus minimise any environmental impacts. Over the past decade sea temperatures have risen significantly and this has produced a range of new challenges. Operators need more sites to allow them to react intelligently to these changing circumstances. More sites will result in improved animal welfare and a reduction of any impacts. Essentially, for any one producer, more sites will result in a lower stock input number but the biomass produced will remain the same.

The restricted nature of the licensing procedure combined with the delays in decision making, result in higher costs and financial uncertainty for the operators. As a consequence of this, the overall viability of the industry is affected. Operators struggle to get financial support due to the precarious position they are in, which ultimately results in reduced performance and potentially higher environmental impacts.

The maximum allowable biomass and the farming area are the main parameters that need to be defined in the licence. This should be backed up with regularly updated monitoring protocols attached to the licence, such as benthic and water quality monitoring, fish health monitoring and navigation requirements.

The licensing system should take account of the knowledge we have gained over 40 years of marine salmon farming. The current system appears to view each licence application as if we had no knowledge of salmon farming, its benefits and impacts. Resources need to be put in place to review licence applications in a timely fashion with the requisite scientific knowledge to make decisions.

If there are areas which require further knowledge then resources should be directed to clarify them. The sea lice issue is a case in point. This debate has been going on for over a quarter of a century. This is a very polarized debate and needs to be resolved one way or the other. There is a lot of bad science out there on this issue and we would all benefit if there was an accepted conclusion to the debate. Why can we not carry out properly funded, well designed, multi-disciplinary, meaningful, scientific research with co-operation from all sides? This would ultimately provide factual, scientific, peer reviewed data and would greatly assist the decision makers to complete their task.

### **Licensing Recommendations**

1. The current system for marine salmon farms restricts sites to either smolts or growers. This makes no sense from a production perspective and limits the rotational options available to the operators. This in turn results in increased loading on the grower sites. A more efficient and logical approach would be to simply limit each site to a maximum allowable biomass. Allowing for more options to rotate crops will allow optimum production (increased survival, higher growth rates, reduced feed conversion rates) and reduce the impact on the local environment.
2. Consideration needs to be given to allowing a greater licensed area for all aquaculture facilities. Increasing the area under licence will allow operators to rotate installations within the site boundaries, providing an optimum production strategy. The maximum allowable biomass will remain the same but the overall impact will be greatly reduced.

3. Consideration needs to be given to allow more site licences for each operator. This will allow more intelligent crop rotation options. Whilst producing the same overall tonnage, operators will produce more efficiently thus reducing any environmental impact.
4. Consideration should be given to extending the period of the licence to 20 years. To achieve the licence a comprehensive and acceptable EIS has to be carried out. This is backed up on a continuous basis with the requirement to comply with the various licence protocols on benthic and water quality monitoring. If the protocols are rigorous enough and the farm is compliant, then the licensing system is operating as it should. Short licence periods result in uncertainty for the operator and make it difficult to achieve adequate financial backing. This leads to inefficiencies which have the potential of increasing any environmental impacts.
5. The monitoring protocols attached to the licence should be reviewed annually by the Marine Institute and updated, taking account of any advances in scientific knowledge.
6. Consideration should be given to allowing licence renewal without the need to conduct an entirely new EIS. If the farm has been compliant with the licence requirements for the period covered it seems unfair to ask for a new EIS to be conducted. An independent expert, acceptable to the Marine Institute, could carry out a review to determine anything that has changed significantly since the EIS was conducted. If certain areas are found to require more updated information then further investigations should be made.

### **Compliance Recommendations**

1. If a farm is consistently non-compliant with the licence protocols then the maximum allowable tonnage should be reduced accordingly. This should be assessed in a scientific manner by the Marine Institute.
2. Consideration should be given to increasing the role of the Marine Institute in relation to the requirements of the monitoring protocols and their implementation. Compliance with environmental and fish health standards should be overseen by the Marine Institute.

## **Fees Recommendations**

1. Consideration should be given to a review of aquaculture licence annual fees. Aquaculture is an expensive business and the marine environment is challenging at the best of times. In my opinion, the fees are quite onerous and they impact significantly on the cash flow of the operators. This can affect the overall efficiency of the farm which in turn can potentially lead to increasing any environmental impact of the operation.
2. Consideration should be given to relating the fee to the actual biomass sold.
3. Consideration should be given to allowing a nominal fee for sites which are fallow.

## **Recommendations on the Timeline for Issuing Licences**

1. The current system is completely unfit for purpose. The long delays are extremely deleterious to the proper running of a multi million euro business. These delays are not helpful for our environment, for public perception or our international reputation.
2. Consideration needs to be given to strict deadlines for each body involved in the licensing process.
3. The Marine Institute should review the scientific evidence presented in an application and provide their conclusions and recommendations within a designated time period - say 3 months.
4. Once the application has been accepted on principle by the Marine Institute, a decision from DAFM should be made within a designated time period - say 6 months.
5. If the application goes before ALAB they should provide a decision within a designated time period - say 6 months, provided any additional requirements have been submitted.