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**From:** Kush Shellfish [info@kush.ie]  
**Sent:** 08 February 2017 16:13  
**To:** aquaculturereview  
**Cc:** [REDACTED]  
**Subject:** Aquaculture Consultation

**Follow Up Flag:** Follow up  
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Dear Lorcán,

I wish you all the best with the review of Aquaculture Licensing. As you are aware we have been at rope mussels since 1983 and have had a long and interesting engagement with the various departments who have been charged with the issue. I will not waste your time or mine with the tedious detail of the history, suffice to say it is interesting and colourful!

On the positive side we have permission, if not active licences, to farm 54 hectare or water in Kenmare Bay, and currently produce approximately 1,000 tonnes of mussels, employ 4 full time and 4 part time (&5%) employees and have an annual turnover in excess of 2 million euro. Our markets for bulk mussels, which accounts for 95% of our sales, cover France, Spain, Italy and the Netherlands. On the value -added side we have markets in Switzerland, Germany, France the UK Spain Dubai and Ireland; approx. 14% of turnover is accounted for by value added sales.

On the negative side, our licences expired in 2000 and 2001 and have not been renewed since. We do have permission under 19A4(B) to operate while the determination is being considered. In addition, we entered into an arrangement to purchase farms totalling 18 hectares in 2004 and have paid over money to solicitors and have not used the farms since. The farms are currently vacant or being squatted on by illegal operators, which is quiet frustrating.

I would make a few recommendations to you to consider while undertaking this review.

1. **Enforcement** needs to be linked to **the Shellfish Registration Document Book**. An operator should get a letter of substantive compliance from the Licencing section of DAFF before being issued with a Shellfish Registration Document Book. By doing this, compliance will be very easy to manage, no navy or police required, just a simple letter of substantive compliance.
2. New licences should not be issued if it interferes with the food supply of existing farms.
3. Where excessive licencing has happened there needs to be a **"Fallowing Scheme"** put in place. Over licencing and overstocking has been part of the necessary journey that has brought us to a new understanding of the relationship between the food supply, biomass, space and production. The interaction of these components of shellfish production now clearly indicated that food supply, not space is the main concern when considering a licencing decision. Historically the main consideration was, a bird's eye view of space from overhead, now it's a nutrient content view under the water that is critical. The journey to get to this understanding cost money, time and in some cases a working life lost. The experience is a foundation stone for the future of the industry. In industry circles, we say it had to be broken before it could be fixed. It might sound simplistic but it is very true. Every aquaculture industry in the world has done the same thing, i.e. overstock and then cut back to optimum production. To move forward here one must take a positive view on the over licencing and overstocking, similar to the view we now take on World War 1 and World War2, as the foundation of peace, (Before Trump at least!) for all of Europe. A Fallowing Scheme should offer an attractive package for licences to be vacated and fallowed forever. The scheme should be funded by an additional charge to all existing licences and future licences on the basis that the learning curve has a cost which benefits all so the cost should be shared by all. I would think €5 to €10 per hectare would fund such a scheme. Poor quality stock would be taken out of the market and in some cases unhelpful operations might also be extinguished, to the benefit of all. I suggest a value of €20,000 per hectare in the case of rope mussels as an answer to this problem. A Self-funding, attractive and clear cut answer to lots of issues that are taking up valuable time, which must be costing a lot of money.
4. **Crawl-Walk -Run**. Exiting, proven operations should be prioritised for expansion. Using audited accounts and Shellfish Registration Gathers Book criterion for new licencing by existing operators should be drawn up to see if the applicant is suitable to move on to "Walking" from "Crawling" or to move on to "Running" from

“Walking”. New entrants should start small and go through the phases of “Crawl”, “Walk” and “Run”. Encouraging “S Athletes in Nappies” is a very naive model for aquaculture development!

5. **Integrated layout and lighting plans** should be a condition of a licencing regime. On the water, no man is an island and it is imperative that co-operation with site layout and lighting are integrated into the licencing system.
6. **Structures and stocking densities** should be part of licences where there are multi users of a defined waterbodies such as harbours or bays. Food flows in aquaculture so the “Common Resource” mentality such as sheep on a hill should be reflected in the licence.
7. **Training.** New applicants should be required to do a “**Blue Cert**” which give a clear understanding of the regulatory framework underpinning shellfish production e.g. biotoxins, water quality, Shellfish Registration Document Books, Licencing and all necessary information necessary to operate legally and responsibly. Honouree Certs could be granted to persons who have shown to have a clear understanding of such matters, in fact Honouree Doctorates in some cases!
8. **Time Frame.** Licences should last for 20 years and renewals process should begin 1 year before expiry and allow for seamless licencing.
9. **New licences Time- frame.** New licence applications should be determined within 1 year. All consultees should be given a set time- frame to respond in full, which if missed signifies acceptance that the licence should be issued. Such consolation needs to be enshrined in law.
10. **Recognition of EU policy.** Aquaculture is an industry of the future as laid down in **Blue Growth**. The future is bright and the product is Low Carbon Emissions and indigenous. Irish Shellfish cannot be grown in China (G Gallagher) Coastal Communities need suitable employment. Shellfish are low calorie food and high in vitamins an minerals. Shellfish helps clean the environment. The world population is growing and needs to be fed. A massive opportunity lies on our doorstep to enhance the Irish economy and the lives of everybody on the island. **Aquaculture Deserves a Licencing System Fit for Purpose.**

Thanks for taking the time to consider my submission and the best of luck.

Regards

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