

Loughs Agency

Gníomhaireacht na Lochanna

Factrie fur Loughs



**LOUGHS AGENCY
SUBMISSION TO THE
AQUACULTURE LICENCE
REVIEW GROUP**



Salmon Aquaculture

A more holistic business focused approach is required to aid the sector so to allow expansion and avoid limiting production within the salmon sector. Controls (licence conditions) need to be current and enforced (inspections and penalties). Public perception of this activity needs to be enhanced and confidence given to the public in terms of environmental sustainability and to dismiss the negative health benefits being portrayed in the media and certain vested interests.

The reward of excellence in this sector needs to be recognised to allow for expansion within the dormant licensed areas currently “active”.

Licensing of this sector should be determined on the basis of a planning type process with key milestones and timelines being publicly available to applicants on the progression of their application through the departmental process.

Oysters

Oyster aquaculture is the growth industry currently as can be seen with the significant expansion in Lough Foyle although unregulated and creates the most direct employment on the Island. The French market is still the centre of Irish exports and there is a need to look at new opportunities for growers and also ensure that expansion of viable businesses is recognised.

The reward of excellence in this sector needs to be recognised to allow for expansion within the dormant licensed areas currently “active”.

Licensing of this sector should be determined on the basis of a planning type process with key milestones and timelines being publicly available to applicants on the progression of their application through the departmental process.

Mussel Aquaculture

A more holistic business focused approach is required to aid the sector so to allow expansion and avoid limiting production within the mussel sector. Controls (licence conditions) need to be current and enforced (inspections and penalties). Public perception of this activity needs to be enhanced and confidence given to the public in terms of environmental sustainability.

The reward of excellence in this sector needs to be recognised to allow for expansion within the dormant licensed areas currently “active”. This sector is increasing production following a significant decline due to see availability.

Licensing of this sector should be determined on the basis of a planning type process with key milestones and timelines being publicly available to applicants on the progression of their application through the departmental process.



Opportunities to deliver a more business focused system

Limits to production in the Irish Aquaculture industry have arisen as a result of major issues surrounding the timeframes associated with aquaculture licencing, both in terms of new licences and renewal of existing licences. Many of these issues are as a direct result of the system's conflict with a number of EU environmental Directives including compliance with the Habitats Directive and Birds Directives. The subsequent backlog in licence processing has meant that producers are blocked or significantly limited when it comes to eligibility for grant aid and other forms of funding. These limitations are due to a lack of clarity over site tenure and proof thereof and the legalities surrounding current status of producers working under Section 19 (4)(a) permits in terms of differences between this and "Full, valid licence" status.

Other issues with the current licencing process include;

- Issues with site boundaries – derived from archaic methods of positioning used in the original site boundary processes
- Issues with transfer of licences
- Issues with sub tenancy
- Requirements for flexibility in licence conditions to allow for novel production methods/equipment
- Un-regulated aquaculture - Lough Foyle
- Previous failings in robustness of Appropriate Assessment process

Primarily there is a significant need for modernisation of the administration of the licencing process specifically a digital system which allows tracking of applications through the process thus improving transparency and allowing for logging of specific milestones. There is also a need for amendments to the licencing process which allow for clear, flexible licence templates which avoid contradictory terms and conditions being incorporated into the legally binding parts of the licences. The process must create a balance between commercial flexibility (in terms of legal status of licences/permits) and environmental sustainability/compliance with EU Directives.