

Michael Muhr



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Ms. 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

Dear Ms. Morgan,

Submission to the Independent Aquaculture Licence Review Group

I welcome the establishment by Minister Michael Creed TD of the independent review group on licencing.

Background to my involvement in salmon farming in Ireland.

My first investment in the salmon farming in Ireland dates back to the 1980's. Since that time I have invested significant personal funds in the sector. Unfortunately some such investments have not been successful. However, I have never lost faith in the business and I am of the genuine belief that the industry has gone through a very steep learning curve in the last 30 years and the organic salmon sector is now well placed to harness its full potential into the future. Great strides have been made in the farming practices of salmon farming with new technologic advances in terms of farming husbandry reducing the risk that existed in the sector in the years gone by.

My current involvement as an investor in the sector is as follows

- Major shareholder in Irish Seaspray LIMITED. This company is the only fully Irish organic salmon smoke house in Ireland, located in Leitormor, Connemara employing over 30 people.
- 50% shareholder in Bradán Beo Teo, a successful organic salmon Producer with a number of sites in Cill Chiaran Bay in South Connemara
- Shareholder in Irish Seafood Producers Group, the organic salmon sales and marketing company located in Cill Chiaran, South Connemara
- A major shareholder in Cill Chiaran Eisc Teoranta, the processing factory for the processing of irish organic salmon for a number of Producers who sell their organic salmon through Irish Seafood Producers Group.

I am passionate about the importance of the contribution made my companies to the communities in which they operate. The industry has invested considerable resources in its communities. Regular contributions, both in cash and in kind are made in the local area. Many of my companies share their physical facilities with local groups and organisations. It is no surprise, therefore, to note that there

is significant loyalty to this industry from within its own communities. I am very proud when I go to visit my operations on a regular basis to see so many native Irish speakers working on either the farms or in the processing factories.

Issues in regard to Licenses

From my direct discussions with other Producers they clearly exist a high level of frustration and worry within the salmon farming sector in regard to how the license system is operated presently.

The key area that I would like the Aquaculture Licensing Review to focus on is;

1. Legislation

- Avoid a complete overhaul of the Licensing system.
- Modify the existing licensing Acts through regulation and Statutory Instruments.
- Note EU directives for clarifying any interpretation of the current licenses
- Existing Foreshore licenses should incorporate associated activities such as the laying of temporary pipe on the foreshore to for the purposes of treating fish with freshwater.

2. Administration of the Licensing system with the Department of Agriculture, Food and the Marine

- Separate the compliance role with an independent Office within DAFM that will have responsibility for license applications and EIS.
- In regard to renewals/new Applications; timeframes on critical steps and overall process similar to planning on land.
- ALAB brief to consider the integrity of the process and science that is provided in any appeal.
- Other government Agencies should and adopt and adhere to government policy. Is it correct that the government should be funding IFI who are undermining government policy on aquaculture?
- Currently Producers must hold an up to date aquaculture license and a foreshore license (as required) that are in compliance with the Habitats and Birds Directives and be fully compliant with the terms and conditions of those licenses to qualify for grant aid. Most Producers have applied for license renewals in 2012 and are still awaiting clarity from DAFM in regard to such renewals and therefore are unfairly denied access to vital grant aid.

3. The License

- Simply conditions relating to production. Base license on maximum biomass on site rather than harvested tonnage or number of smolts put to sea.
- Tenure of license should be for minimum of 20 years as long as the Producer is compliant on all aspects of the license.
- Renewal of licenses should not require a full license application. Renewals should be based on historic compliance.
- No requirement for a full EIS/NIS on renewal applications.

4. Compliance

- Inspectorate to oversee issues in regard to environment, fish health and stocking.
- Marine Institute's role properly defined in respect of ecology and biology
- Engineering role should only be responsible for compliance in the area of engineering. It should not be involved in any biological issues.
- Officials dealing with compliance needs to have a better understanding/knowledge of fish farming.

I wish you and your colleagues the very best of luck in your determinations.

Yours sincerely


Michael Muhr