

Independent Review of Aquaculture Licensing
C/O Deirdre Morgan
Secretary to the Review Group
Department of Agriculture, Food and the Marine

A chara,

I would like to thank you in advance for considering my views, observations and concerns conveyed in this submission to the Independent Review of Aquaculture Licensing. I must however, declare at the outset my dismay at the make up the "Independent Review of Aquaculture Licensing" group.

Mary Moylan is a career civil servant and may follow Government policy in regard to increasing aquaculture, salmon farming output in particular.

Dr. Ken Whelan was Director of Aquaculture with the Marine Institute (MI) for years and is perceived by many in the fishing/angling community in Ireland to be one of the main architects of salmon farming in Ireland and therefore biased when it comes to salmon farming issues.

Mr. Lorcan Ó Cinnéide, as chairman of the Irish Fish Producers & Exporters Association, and as a Board member of the Marine Institute, is also perceived as an outspoken cheer leader for the salmon farming industry for years.

My main concerns/observations are based on the existing unlicensed salmon farms in Cill Chiaráin bay, Conamara, Co Galway. My concerns are applicable and echoed by other concerned 'stakeholders' up and down the 'Wild Atlantic Way'.

- Open net pen is not a solution to the problem of over fishing: *It damages natural ecosystems on a local and a global level, including wild stocks, habitats and water quality. Feeding carnivorous salmon in farms means other wild species must also be*

harvested, resulting in a larger carbon footprint – since the fish feed must be fished, processed and transported”. “If you must farm salmon, then at least reduce the local impact by using closed pens removed from the marine open environment” (Slow Food)

- Salmon farming v shellfish. Precedence and financial supports are given to develop salmon farming. Shellfish and particularly the native oyster is neglected in Cill Chiaráin bay by Údarás na Gaeltachta, the present owners of the oyster beds. Údarás has invested millions in the salmon farming industry in the bay - an SAC, leaving the bay heavily polluted as a result. The native oyster is impacted by this
- Use of Antibiotics and pesticides in salmon farming and the dubious "Organic" labelling of farmed salmon is and will be contested
- The spread of diseases from Concentrated Animal Feeding Operations (CAFOs) to wild animals/fish and potentially to humans is a serious concern worldwide
- Algae blooms and red tides resulting from salmon farms impact shellfish and lobster fishermen, winkle pickers and seaweed harvesters
- Aquatic ecosystems required for salmon production are limited
- The effects of climate change
- Wild Fish stock depletion world wide
- It divides vulnerable communities
- Sea lice and parasites have no borders: it has already resulting in the near demise of the sea trout on the Irish Atlantic coast and and a huge reduction in wild salmon
- Self-Regulation, 'soft touch-regulation' and monitoring is by the promoters or the producers and has resulted in detrimental damage to the environment for all users
- Salmon farms in SACs operating without Licences (Cill Chiaráin, Conamara SAC)

- Unauthorised/illegal abstraction of fresh water from reservoirs and protected lagoons 'unnoticed' unregulated without any fines imposed by the regulators/promoters
- On the Wild Atlantic way: On a collision course with local tourism development and sustainable employment in that sector
- Breaches of EU habitats directives on a regular basis: Shooting of seals, protected under the same habitats directives
- Marine Harvest now operating 80% of salmon farms in Ireland: (where are the SMEs which the EMFF was meant to support?)
- Effective Lobbying of an Taoiseach and ministers by multinationals resulting in decisions made in their favour when local and citizens' concerns are ignored
- Costly fines that will impact the reputation of all food producers and growers resulting from judgements against Ireland for breaches of EU Directives.

Finally, the question of how the publicly owned marine resources and territories are going to be used and by whom is always going to be contested. Hence a 'Public Consultation' such as this, reaching but few will leave many stakeholders disenfranchised. It is already presenting as an unfair process.

Le meas,

Áine Ní Cheannabháin (Oidhreacht Iorras Aintheach)



Conamara

Co. na Gaillimhe.

