

# SALMON WATCH IRELAND

## **The Licensing and Regulation of Marine Finfish Farms in Ireland**

1. The Irish regime for the licensing and regulation of marine finfish (overwhelmingly salmon) farms is in chaos. If the situation is not addressed as a matter of urgency then:
  - the Government's plans for the development of the sector will not be realised and
  - serious damage will continue to be inflicted on migrating wild juvenile salmonids (salmon and sea trout) and, as a result, on already hard pressed stocks of these fish.
2. The main deficiencies in the current regime are that:
  - the statutory framework is inadequate and, in particular, takes little account of the wider environmental issues associated with aquaculture;
  - some of the key control measures (eg control of sea lice and benthic, sea floor, monitoring) are essentially voluntary;
  - there is a great deal of monitoring yet no enforcement of the regulations and protocols that do exist
  - a large number of licensees do not pay their licence fees;
  - there is no process in place for assessing applications for the renewal of licences due to the "head in the sand" approach by the Department of Agriculture Fisheries and Food (DAFF) to enforcing European Directives and ECJ rulings;
  - the section in DAFF responsible for the aquaculture sector is totally inadequately resourced both as to number and to the mix of expertise of the people allocated to it.
3. Evidence of the damage that inappropriately sited and poorly managed salmon farms can inflict on wild stocks is incontrovertible. Scientific research in Ireland and other NASCO nations and the observed effect on wild stocks of both the creation and removal of farms overwhelming points towards the conclusion that salmon farms generate large concentrations of sea lice and that that these concentrations are hugely inimical to the survival of migrating juvenile salmon and sea trout.
4. The Cawley report acknowledged the sea lice problem but it received scant attention in either the BIM plan for the sector or in the DAFF's green paper on the control of sea lice which was largely focussed on the damage to the fish being farmed rather than on migrating wild fish.
5. The conventional approach internationally (and in Ireland) to the control of sea lice on salmon farms has been to monitor levels of lice on the fish being farmed and to chemically treat the fish when trigger levels are reached. The system in Ireland is operated by the Marine Institute. It has become clear in Ireland and elsewhere, however, that while this system may be adequate to protect the farmed fish from heavy burdens of lice, it is totally inadequate as either an indicator of the impact on wild fish or a protector of wild fish. More advanced fish farmed licensing regimes, such as in Norway for instance, are, therefore, moving to a system that confines fish farming to areas remote from salmonid bearing rivers. It is understood that a similar approach is being considered in Scotland.

6. There is, as yet, no plan in Ireland analogous to that of Norway to properly address the sea lice issue despite it being an essential building block in plans for the development of the fin fish farming sector. Nor, indeed, is there any evidence of a serious effort to address the wider regulatory needs of the sector.
7. Salmon Watch Ireland (SWIRL) has lodged a complaint with DG Environment of the EU Commission about Ireland's failure to meet the requirements of the Habitats Directive (especially Article 6) and of the Environmental Impact Assessment Directive in the management of salmon farms. The Commission has already been in touch with DAFF regarding the complaint and Ireland's reply has been deemed to be insufficient in addressing the issues. The Salmon Watch Ireland submissions to the European Commission can be found on [www.salmon.ie](http://www.salmon.ie).
8. There were only 133 full time equivalent employees directly engaged in salmon farming in Ireland in 2007 (BIM figures). This obviously does not include downstream employment in value added activities but the fact is that many of these enterprises rely on imported fish for processing for quality reasons.
9. Marine Harvest (the world's largest salmon farming company, listed on the Norwegian Stock Exchange) currently produces over 75% of Ireland's 10,000 per annum tonnes of farmed salmon. Norway produces 900,000 tonnes and Scotland 180,000 tonnes.
10. Indigenous salmon farming companies have been propped up by large grant aid from Udaras and BIM and are struggling in the current climate. The over €50 million given to fin-fish farming in grant aid over the past 20 years has resulted in a tiny industry with very little employment, albeit employment in remote areas. In addition, very many of the companies that have been grant aided are no longer in existence.
11. All of these issues, and others, have recently come together in the case of Bertraghboy Bay in Connemara. The appendix to this memorandum summarises the history and impact on wild juvenile salmonids of poorly sited and managed salmon farms in the bay over the past twenty years. This history is replicated all around the coast in places where salmon farms are sited in proximity to salmon bearing rivers.

**Contacts: Simon Ashe: Phone 087 996 2424 Email: [fishing@bhinch.iol.ie](mailto:fishing@bhinch.iol.ie)  
Niall Greene: Phone 086 826 9222 Email: [niall.b.greene@gmail.com](mailto:niall.b.greene@gmail.com)**

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## **APPENDIX**

(to “The Licensing and Regulation of Marine Finfish Farms in Ireland”)

### **The Situation in Bertraghboy Bay**

#### **Bertraghboy Bay Salmon Farm Ownership and State Investment History**

There are four salmon farming sites licensed in Bertraghboy Bay.

Udarás na Gaeltachta set up operations in Bertraghboy Bay and Kilkieran Bay in 1985 under a company called Bradan Mara Teoranta. This company received IR£2,400,000 in grant aid and investment from Udarás alone up to 1991.

Sealax Ltd also operated a site in Bertraghboy Bay in the late 1980s however ceased trading in 1990. This company no longer exists.

Bradan Mara was bought by PJ Carroll and Co. Ltd in 1989. PJ Carroll operated in the bay whilst receiving up to IR£500,000 from Udarás for its various farming and processing operations. This operation became unviable and was sold to Gaelic Seafoods Ltd.

Gaelic Seafoods Ltd operated in Bertraghboy Bay from 1995 until 2002 when it went into receivership. It received IR£480,000 from Udarás during this time. IR£376,000 was granted under the NDP 2000-2006. However, it is unclear how much of this was actually paid.

Comhlucht Bradain Chonamara Teoranta (CBCT) was set up by 5 salmon farming companies in 2002 to buy the assets from the Gaelic Seafoods Receiver. It received €420,000 from Udarás for the purchase of the site (even though Udarás were owed over €300,000 by the Gaelic Seafoods {the company in liquidation}). CBCT has never actively traded as a salmon farming company (as the 5 constituent companies have individually utilised the sites at various stages since 2003) yet it had accrued losses of over €680,000 by 2007

**Udarás na Gaeltachta has invested in the region of €4.7million in salmon farming activities in Bertraghboy Bay since the early 1980s. Figures from BIM are unavailable. Three companies have gone out of business and CBCT is reported to be currently running at large losses.**

#### **Bertraghboy Bay Salmon Farm Effects on Wild Fish Populations**

The introduction of salmon farming in the estuary at Ballynahinch in 1988 destroyed the stocks of both salmon and sea trout. Annual sea trout rod catches collapsed from 5,500 to 100 whilst the salmon catch fell from 500 to 50. The sea lice emanating from these salmon farms have been proven to be the cause of this utter decimation of the wild stock of salmonids.

When the farm was fallowed during the spring period in 1994 and 1995 there was an upsurge in the survival of salmon and sea trout returning to the river. When the salmon farm stopped operating in 2004, the sea trout rod catches at Ballynahinch improved from 100 to 1,500 and the salmon catches have increased from 50 to 270 up to 2008

Heavily infested juvenile sea trout post smolts returned to the river in mid May 2009. This phenomenon has not occurred since the salmon farm last operated in 2004. There will almost certainly be a decrease in the salmon and sea trout populations in the immediate future should the salmon farm continue to operate

### **Cod Farming Trial Licence**

In January 2005, CBCT were granted a 3 year trial licence to cultivate cod in all four sites in Bertraghboy Bay. Cod had never been farmed in Ireland and Bertraghboy Bay was chosen as an ideal location to carry out cod cultivation trials. Udarás na Gaeltachta granted over €450,000 to Trosca Teo for the cod trial cultivation. The initiative is also being supported by BIM, The Marine Institute, UCC, The Martin Ryan Institute and NUI Galway.

CBCT were granted the experimental cod farming licence on the basis that no salmon would be farmed on any of the sites for the duration of the cod trial. The Department “suspended” the salmon licences for the three years up to January 2008.

Three scientists in the Marine Institute (the Department’s technical advisors), the chief fisheries scientist at the Central Fisheries Board and the aquaculture vet employed by CBCT all advised that salmon and cod should not be cultivated in the same bay. On 14<sup>th</sup> October 2008, CBCT stocked one of the sites in Bertraghboy Bay with 250,000 salmon smolts. The Department only received notification of this on 14<sup>th</sup> November 2008.

CBCT is continuing the cod trials illegally in Bertraghboy Bay, without a licence and have not applied for a full aquaculture licence despite indicating in January 2008 that they would submit an application at that time.

Ballynahinch Fisheries Cooperative (which comprises fishery owners on rivers flowing into Bertraghboy Bay) had an inconclusive meeting with officers of the Coastal Zone Management Division of DAFF in Agriculture House on 12<sup>th</sup> February. There has been no reply to any communication sent to the division since the meeting.

### **Further Examples of Non Compliance with Licensing Regulations in Bertraghboy Bay**

- The company has failed to submit a benthic monitoring report for any of the sites since it was assigned the licences in 2003;
- There are substantial fees owing on the licences;
- The pens are regularly outside the licensed foreshore area and they have not been moved back within the areas despite numerous requests from the Commissioners of Irish Lights;
- There are numerous derelict cages on one of the sites (outside the foreshore area) and the company has not made an attempt to move the cages since first asked to in 2002;
- Water quality monitoring has not taken place on the site since 2003 despite it being part of both the salmon and the cod licences.

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