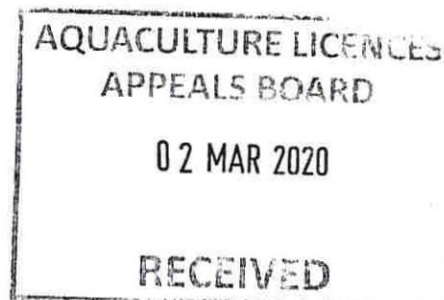


**Save Kilmakilloge Group**  
**c/o Hawker**  
**Loughanacreen, Lauragh, Killarney, Kerry, V93 DE4P**

Aquaculture Licences Appeals Board (ALAB),  
Kilminchy Court,  
Portlaoise,  
Co. Laois,

17 Feb 2020

Your ref : AP17/2019  
Site ref : T06/513A



To whom it may concern

**Re : Amalgamating of 7 appeals in Kilmakilloge Harbour**

We, as a group representing all users of Kilmakilloge Harbour, broadly agree with considering all appeals together as our joint interests are for the long term health for the whole of the harbour and all its users.

We firmly believe that Kilmakilloge Harbour is

- at capacity for viable mussel farming and NO new areas should be granted licences without a long term Carrying Capacity Report. Any study on capacity should commission technical advice from the fishing industry to take into account other life in the harbour such as shrimp, scallops etc.
- much of the traditional fishing grounds have been lost to mussel farms so the needs the fishermen must be given full consideration
- further expansion of mussel farms seriously impacts the local natural environment and related tourist and leisure activities which are vital to the economy of the locality.

Looking at the appeals together illustrates the fact that there appears to be favouritism towards one operator, namely Kush Seafarms, in that

- they have been granted the only 2 new farms covering an area of 8 hectares (Site Ref : T06/513A & T06/360A)
- there is a contradiction between the granting of licences to Kush Seafarms and the refusal to adjoining farms from other operators. Namely, refusal has been on the grounds of negative visual impact and negative impact on existing licensed sites. These grounds have not been applied consistently and impartially to the Kush Seafarms applications.

We consider each appeal on the following page but in summary

- We agree with the renewal of licences to existing mussel farmers in the harbour
- We disagree strongly with the granting of licences for any new areas.

We would like to express concern that there is no representation on the Appeals board for the fishing industry or tourism. We are also aware that at least two members of the Appeals board are business associates and/or personal friends of the owners of Kush Seafarms Ltd. We would like to be assured that any conflicts of interest result in board members recusing themselves.

Yours faithfully

John O'Sullivan (for the fishermen)

Carl Daly (for Mussel farmers)

Janet Hawker (Other)

**Save Kilmakilloge Group**  
**c/o Hawker**  
**Loughanacreen, Lauragh, Killarney, Kerry, V93 DE4P**

**TO CONSIDER EACH APPEAL INDIVIDUALLY**

**Site ref : T06/360A** for a new 2 hectare farm off Spanish Island by Kush Seafarms Ltd

We disagree with the granting of this licence

- Site has been farmed without a licence for some time. By granting a licence to Kush here you give a green light to illegal extension of the overall area farmed within the harbour even if Kush was not the original offending farmer
- Impacts on slowly recovering Tern nesting site on Spanish Island.
- Overstocking of the harbour with mussels threatens livelihood of existing mussel farmers.

**Site ref : T06/364A** for a new 6 hectare farm off Collarus Point by Kieran Lyons

We agree with the refusal of this licence for the same reasons as we object to granting of a licence to T06/513A

- Site is also over traditional fishing grounds.
- Site totally blocks access to Collarus anchorage thereby impeding navigation route into the harbour which has several moorings in it and is a safe anchorage for visiting boats in westerly storms.
- Overstocking of the harbour with mussels threatens livelihood of existing mussel farmers.

**Site ref : T06/254** for a new 2 hectare farm off Spanish Island by Shamrock Shellfish Company

We agree with the refusal of this licence

- Site is also over traditional fishing grounds.
- Site totally blocks access around Spanish Island for boats servicing other farms and leisure craft
- Impacts on slowly recovering Tern nesting site on Spanish Island.
- Overstocking of the harbour with mussels threatens livelihood of existing mussel farmers.

**Site ref : T06/495A** for a new 2.5 hectare farm off Collarus Point by Shamrock Shellfish Company

We agree with the refusal of this licence for the same reasons as we object to granting of a licence to T06/513A

- Site is also over traditional fishing grounds and well away from the existing mussel farming area.
- Negative visual impact especially from the Wild Atlantic viewing point opposite
- Impeding of main navigation route into the harbour and safe anchorage.
- Overstocking of the harbour with mussels threatens livelihood of existing mussel farmers.

**Site ref : T06/35A** for renewal of a 2.5 hectare farm off Spanish Island by Shamrock Shellfish Company

We agree with the renewal of this licence

- Site has been farmed by Shamrock Shellfish responsibly for 20+ years
- It is the main livelihood for the owner of Shamrock Shellfish and we support small local operators
- Shamrock has agreed, along with other mussel farmers in the harbour, to reduce stocking rates as per his licence renewal.

**Site ref : T06/106** for renewal of a 6 hectare farm off Spanish Island by Shamrock Shellfish Company

We agree with the renewal of this licence

- Site has been farmed by Shamrock Shellfish responsibly for 20+ years
- It is the main livelihood for the owner of Shamrock Shellfish and we support small local operators
- Shamrock has agreed, along with other mussel farmers in the harbour, to reduce stocking rates as per his licence renewal.