

An Bord Achomhairc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board



AP1/2019 Deenish

Submission received from Inland Fisheries Ireland

7 June 2019

OHara, Mary

From: Greg Forde [REDACTED] >
Sent: 07 June 2019 10:53
To: Alab, Info
Subject: RE: Appeal in Support of Ministers decision
Attachments: Aquaculture Licence Comments on Headed paper Deenish Island T06-202 June 2019.docx

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mary,
Please find comments from IFI as noted.
Regards Greg Forde

Greg Forde
Ceann na n-Oibríochtaí
Head of Operations

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel [REDACTED]
Fax [REDACTED]
Email [REDACTED]
Web www.fisheriesireland.ie
Teach Breac, Oileán an Iarla, Gaillimh, ÉIREANN.
Teach Breac, Earl's Island, Galway, IRELAND.

Help Protect Ireland's Inland Fisheries

Call 1890 34 74 24 to report illegal fishing, water pollution or invasive species.

From: Greg Forde
Sent: 07 June 2019 10:31
To: 'info@alab.ie'
Subject: Appeal in Support of Ministers decision

Dear Sir / Madam,
Today (Friday 7th June 2019) Inland Fisheries Ireland are submitting by hand delivery comments from Inland Fisheries Ireland in support of the Ministers decision to revoke licence in respect of salmon aquaculture site T06/202 at Deenish Island in Kerry. The appeal is being hand delivered and the payment being made by SEPA direct into your account.
Can you please acknowledge when these two separate actions are completed.
Many thanks Greg Forde

Greg Forde
Ceann na n-Oibríochtaí
Head of Operations

Iascach Intíre Éireann
Inland Fisheries Ireland

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D'fhéadfaí go bhfuil an ríomhphost seo agus ceangaltáin ar bith atá in éineacht leis faoi rún agus iad beartaithe d'úsáid an duine a bhfuil a s(h)eoladh air amháin. Dearcthaí nó tuairimí ar bith atá curtha in iúl ann, baineann siad leis an údar amháin, agus ní chaithfidh go n-aontaíonn Iascaigh Intíre Éireann leo. Mura tusa faighteoir beartaithe an ríomhphost seo, ná déan rud ar bith mar gheall ar an méid atá ann, ná é a chóipeáil ná é a thaispeáint do dhuine ar bith eile. Déan teagmháil leis an seoltóir, le do thoil, má chreideann tú go bhfuair tú an ríomhphost seo trí earráid.



Iascach Iníre Éireann
Inland Fisheries Ireland

To: Aquaculture Licence Appeals Board
Kilminchy Court
Dublin Road
Portlaoise
Co. Laoise
R32 DTW5

7th June 2019

Dear Sir / Madam,

The following are comments from Inland Fisheries Ireland in respect of:

The decision by the Minister for Agriculture, Food and the Marine to discontinue the salmon aquaculture licence of Silver King Seafoods Ltd for the Deenish Island site in Kenmare Bay.

The Minister for Agriculture, Food and the Marine made a determination in May 2019 that a breach of a licence condition 2(e) had occurred at the Deenish Island aquaculture site in Kenmare bay whereby the company harvested 1,108.91 tonnes in 2016, contrary to their licensed allowable harvest of 500 tonnes. This harvest figure was 121.78% in excess of what was permitted under licence condition 2(e).

Inland Fisheries Ireland has been concerned for a considerable time period regarding the potential risk to wild salmon and sea trout stocks of salmon aquaculture facilities, due to the potential negative effect of sea lice and escaped farmed salmon. IFI have made numerous submissions to the Department of Agriculture Food and the Marine and to ALAB, particularly in relation to the negative impact of sea lice emanating from salmon farms on wild salmonids. This concern is based on scientific investigation and monitoring both in Ireland and internationally. A summary of findings from the published literature is set out below.

Previous studies in Ireland (Tully and Whelan, 1993), Scotland (Butler 2002) and Norway (Heuch and Mo, 2001) have indicated that in spring, the majority of nauplii sea lice arise from ovigerous lice infesting farmed salmon. Tully *et al.* (1999) have demonstrated that the presence of salmon farms significantly increased the level of sea lice infestation on sea trout post smolts in Ireland. Similar findings have been reported from Norway (Grimnes *et al.* 2000) and Scotland (Mackenzie *et al.* 1998, Butler, 2002). In a recent study, Taranger *et al.* (2014) undertook a risk assessment of the effects of salmon lice on wild salmonid populations along the intensively farmed Norwegian coastline over the 2010-2013 period and found that sea trout



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from the majority of sampled sites from Hordaland to Finnmark had salmon lice infections, mainly resulting from salmon farming, that indicated moderate or high mortality of sea trout while twenty-seven of these stations indicated moderate or high likelihood of mortality for wild migrating salmon smolts.

In an extensive review of the impacts of the salmon louse on sea trout, Thorstad et al. (2015) concluded that salmon farming increases the abundance of salmon lice in the marine habitat, and there is extensive published evidence that salmon lice in intensively farmed areas have negatively impacted wild sea trout populations by increasing marine mortality, changes in migratory behaviour, reduction of marine growth and reduced population sizes. Thorstad et al. (2015) reviewed all experimental studies conducted on the mortality of salmon lice on Atlantic salmon post-smolts, comparing fish chemically treated to provide protection from salmon lice with control groups of untreated fish. These field studies have been conducted with the presumption that salmon lice originating from local farm sources might confer increased mortality risk to the untreated control smolts, and that this effect will extend to the wild Atlantic salmon smolt population. The review concluded that comprehensive meta-analyses, long-term studies, and similar results from an increasing number of experimental studies, support that mortalities caused by salmon lice in farm-intensive areas can be expected to result in 12–29% fewer returning Atlantic salmon adult spawners. ICES (2016) also reviewed the impact of sea lice from salmon farms on mortality of wild salmon smolts. The ICES report comments that in some studies, the impact of sea lice has been estimated as losses of returning adult salmon to rivers. These estimates indicate marked variability, with losses in individual experiments ranging from 0.6% to 39%. The ICES report concludes that results suggest that sea lice induced mortality has an impact on Atlantic salmon returns, which may influence the achievement of conservation requirements for affected stocks. Shephard & Gargan (2017) analysed a 26-year time series of returns of one-sea-winter Erriff salmon to the Irish coast and to their natal river, and found strong reductions (>50%) in returns in years when there had been high lice levels on nearby salmon farms during the smolt migration. Results demonstrate that sea lice infestation from coastal salmon aquaculture is an important factor explaining declining returns of wild salmon to a west of Ireland Special Area of Conservation.

The Lough Currane fishery, situated close to the village of Waterville, is regarded as the premier sea trout fishery in Ireland and is known for its large multi sea winter and repeat spawning sea trout. In excess of two thousand sea trout were recorded on the fishery up until 2015 and numbers have declined dramatically since then. There is concern that sea lice emanating from the Deenish Island site, 10.8 km from the mouth of the Waterville river, have impacted on out migrating



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sea trout smolts and kelts and may be responsible for the apparent dramatic decline in sea trout numbers on the fishery. Over the 2006-2013 period, the Deenish Island site had either been fallow or only contained salmon smolts in spring. With the presence of larger grower salmon at the site in recent years, IFI has been concerned regarding the apparent large-scale decline in sea trout runs at the Currane fishery. In this regard, IFI sought submissions on a proposed bye-law to impose catch & release only angling for sea trout in the Currane fishery in 2018. The purpose of the by-law was to seek to reasonably limit the pressure on sea trout stocks in the area of Ballinskelligs Bay and the river systems which discharge in to the bay. IFI counter data and catch records indicate that there has been a collapse in sea trout stocks in the general Waterville area. The introduction of a Bye-law to prohibit the retention and possession of any sea trout would decrease the pressure on the sea trout stock. The bye-law was introduced in 2018. In conjunction with is bye-law, IFI have initiated a new research programme for the Lough Currane/Waterville fishery to investigate the apparent decline in sea trout stocks. The study will involve salmonid census data, fish monitoring in freshwater and salmonid monitoring in inshore marine waters. Each element will contribute to the determination of status of different life stages of sea trout and salmon to determine if the perceived decline in sea trout stocks in Currane is unique to sea trout and if salmon are also impacted.

Against this background, IFI have serious concerns regarding the potential impact of rearing large numbers of farmed salmon at the Deenish site, located 10.8 km from the mouth of the Waterville river on the future viability of Ireland's premier sea trout fishery. The Currane fishery is also an important salmon fishery with a run of both one sea winter and multi sea winter salmon and is a Special Area of Conservation for Atlantic salmon (SAC) under the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC. IFI therefore supports the decision of the Minister for Agriculture, Food and the Marine to discontinue the aquaculture licence at the Deenish Island site.

End.



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