

## Donegan, Fergus (Alab)

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**From:** Alab, Info  
**Sent:** Monday 22 January 2024 15:11  
**To:** [REDACTED]  
**Subject:** ALAB AP1/2019 - S46 request for Site Ref. T06/202 (Deenish)  
**Attachments:** ALAB AP1\_2019 resp letter Dec 2023..pdf

Dear Ms. McManus,

I wish to acknowledge receipt of your submission.

It will be brought to the attention of the Board at the earliest opportunity.

Regards,

Majella



**Majella Murphy**

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**An Bord Achomhairc Um Cheadúnais Dobharshaothraithe**  
*Aquaculture Licences Appeals Board*  
**Cúirt Choill Mhinsí, Bóthar Bhaile Átha Cliath, Port Laoise, Contae Laoise, R32 DTW5**  
*Kilminchy Court, Dublin Road, Portlaoise, County Laois, R32 DTW5*

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**From:** McManus, Catherine [REDACTED]  
**Sent:** Monday, January 22, 2024 2:55 PM  
**To:** Alab, Info <[Info@alab.ie](mailto:Info@alab.ie)>  
**Subject:** RE: ALAB AP1/2019 - S46 request for Site Ref. T06/202 (Deenish)

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Dear Majella,

Please find attached our submission in relation to your letter dated December 21<sup>st</sup>, 2023.

Best regards

**Catherine McManus**

Operations Director Farming (Ireland)  
MOWI IRELAND

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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# MOWI®

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**From:** Alab, Info <[Info@alab.ie](mailto:Info@alab.ie)>  
**Sent:** Wednesday, December 27, 2023 2:38 PM  
**To:** McManus, Catherine [REDACTED]  
**Subject:** ALAB AP1/2019 - S46 request for Site Ref. T06/202 (Deenish)

**ALERT:** This message originated outside of Mowi's network. **BE CAUTIOUS** before clicking any link or attachment.

Dear Ms. McManus,

Please find attached correspondence for your information and consideration, please.

Regards,

Majella



**Majella Murphy**

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**An Bord Achomhairc Um Cheadúnais Dobharshaothraithe**  
*Aquaculture Licences Appeals Board*  
**Cúirt Choill Mhinsí, Bóthar Bhaile Átha Cliath, Port Laoise, Contae Laoise, R32**  
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Margaret Carton  
Secretary to the Board  
Kilminchy Court  
Dublin Road  
Portlaoise  
County Laois, R32 DTW5.

22.01.2024

RINMORE

**Your Ref: AP1/2019: Site Ref: T06/202**

**Re. Appeal By Mowi Ireland against the decision of the Minister for Agriculture, Food and the Marine, in respect of entitlement to continue Aquaculture Operations under the provisions of S19A(4) of the Act for the culture of salmon in cages at a site east of Deenish Island, Ballinskelligs Bay, Co. Kerry, T06/202 held by Silverking Seafoods Ltd., a wholly owned company of Comhlucht Iascaireachta Fanad Teoranta (Mowi Ireland).**

Dear Ms Carton,

I refer to your letter of December 21<sup>st</sup> 2023 regarding the above mentioned appeal. The following is submitted in relation to observations from third parties.

#### **SEA LICE/SEA TROUT STOCKS**

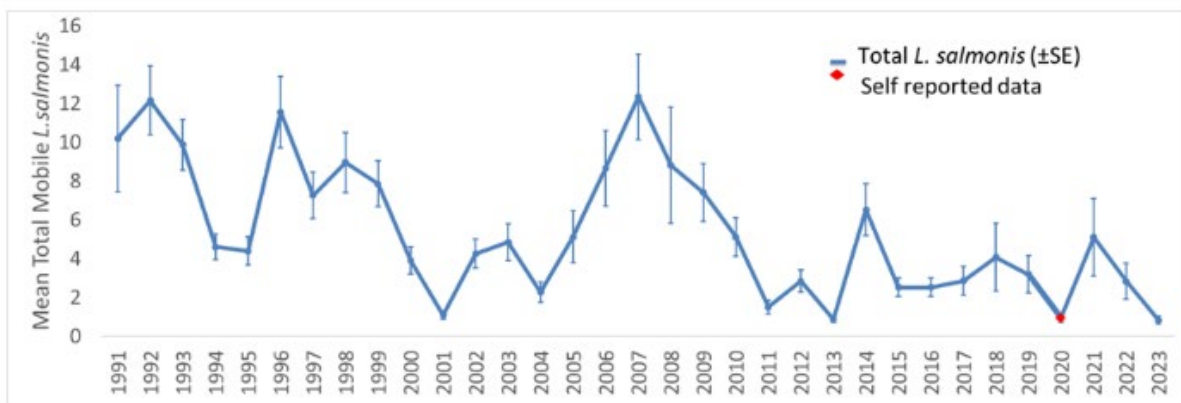
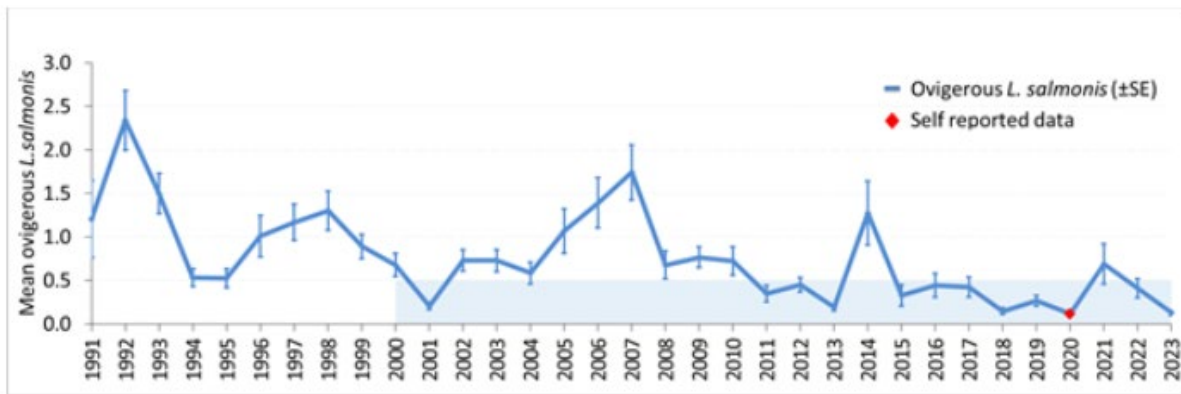
Sea lice are a naturally occurring small ecto-parasitic copepod crustacean found on marine fish, including salmonids. Ovigerous female sea lice are those which produce the infective larvae and treatments are timed to remove adult females before they can release larvae. Setting the treatment trigger at 0.5 ovigerous *L. salmonis* per fish in spring ensures that treatments are carried out when a maximum of half of the fish examined have one ovigerous sea louse. This is a practical time to interrupt sea lice development. Later in the year, the development of new generations is not as synchronised and automatic intervention at a sea lice level of 0.5 ovigerous by way of treatment is not justified. A level of 2.0 ovigerous sea lice per fish has been shown to be a pragmatic level at which intervention by way of treatment is advisable.

Sea lice level of 2.0 ovigerous (0.5 ovigerous in Spring period) are used as Treatment Trigger Levels (TTL) to inform management to take action to reduce sea lice levels, as outlined in the Monitoring Protocol No.3 for Offshore Finfish Farms – Sea Lice Monitoring and Control, Department of Marine and Natural Resources (2000).

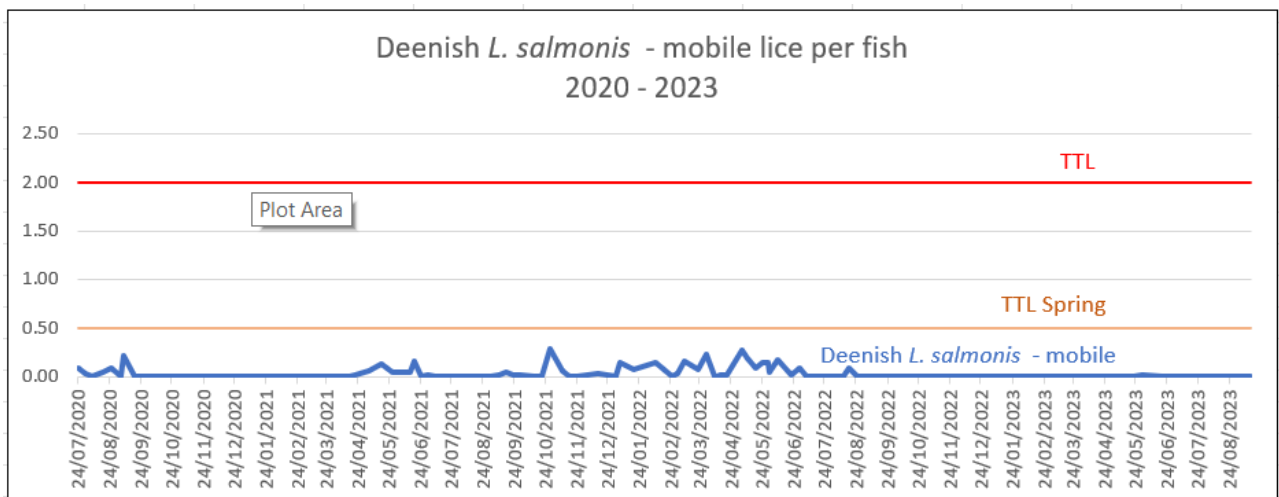
Monitoring Protocol No.3 for Offshore Finfish Farms – Sea Lice Monitoring and Control by the Department of Marine and Natural Resources. Treatment triggers during the spring period are set close to zero in the range of from 0.3 to 0.5 egg bearing females per fish and are also informed by the numbers of mobile lice on the fish. Where numbers of mobile lice are high, treatments are triggered even in the absence of egg bearing females. Outside of the critical spring period, a level of 2.0 egg bearing lice acts as a trigger for treatments.

National Survey Of Sea Lice (*Lepeophtheirus salmonis* Krøyer and *Caligus elongatus* Nordmann) on Fish Farms in Ireland 2010 to 2022 – In the Southwest (all farms) there were no recorded instances of *L. salmonis* infestation levels greater than the treatment trigger level.

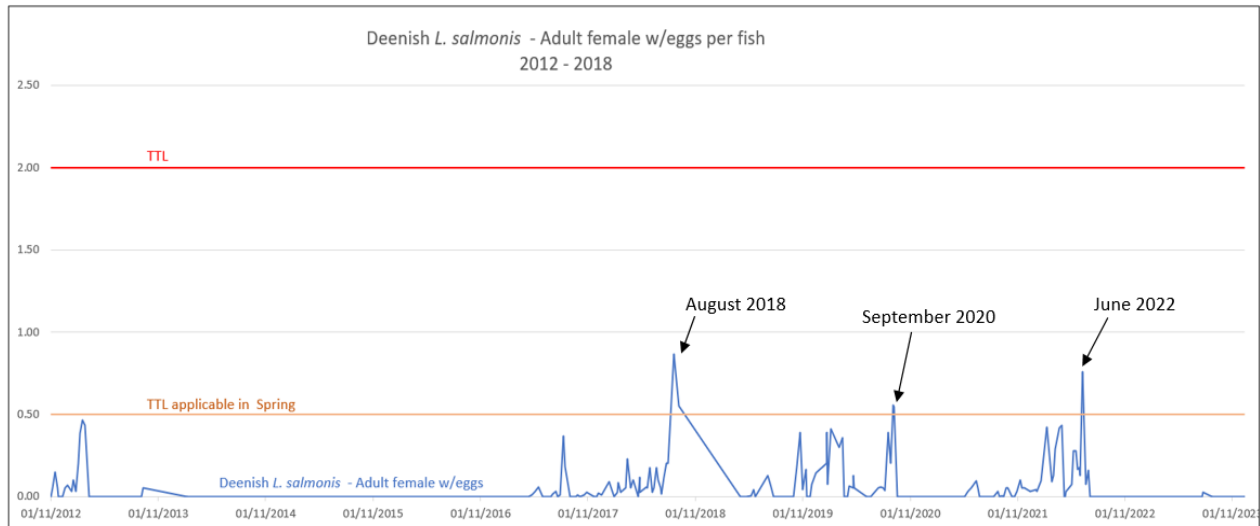
Mowi Ireland	OFFICE Kindrum Letterkenny Co. Donegal, Ireland F92 XD93	PHONE +353 74 9192105
Registered in Ireland as Comhlucht Iascaireachta Fanad Teoranta, VAT No: IE4530734O: Registration No. 66929 Directors: Catherine McManus, David Brennan, Pat Connors, Joseph Gibbons	POSTAL Rinmore, Ballylar P.O. Letterkenny Co. Donegal, Ireland F92 T677	MAIL catherine.mcmanus@mowi.com
		WEB <a href="http://mowi.com">http://mowi.com</a>



**Figure 1:** The above charts, sourced from the Marine Institute website <https://www.marine.ie/site-area/areas-activity/aquaculture/sea-lice/sea-lice> exhibit yearly trend of sea lice levels for all Irish sea farms, for one-sea-winter salmon for each year since monitoring began during the month of May, which is the key month for salmon smolt migration.



**Figure 2:** All mobile *L. salmonis* reported at Deenish 2020-2023 (blue). TTL Spring (orange) is the treatment trigger level set by the Marine Institute for the Spring period and TTL (red) is the treatment trigger level set for all other times. Note that in the sea lice monitoring protocol TTL thresholds apply to Adult ovigerous female *L. salmonis*, but at no time were the TTL levels breached even for all mobile sea lice and for most of this period the levels were significantly lower than the trigger levels.



**Figure 3:** Adult ovigerous female *L. salmonis* reported at Deenish 2012-2023 (blue). TTL Spring (orange) is the treatment trigger level set by the Marine Institute for the Spring period and TTL (red) is the treatment trigger level set for all other times. Note that at no time were the TTL levels breached and for most of this period the levels were significantly lower than the trigger levels.

With Regards

*Catherine McManus*

Catherine McManus

OPERATIONS DIRECTOR IRELAND