Rec'd by hand 28/9/26

ALAB
An Bord Achomhairc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board

Notice of Appeal Under Section 40(1) of Fisheries (Amendment) Act 1997 (No.23)
APPEAL FORM

Please note that in accordance with Section 40(2) of the 1997 Act this form will only be accepted if delivered by **REGISTERED POST or by hand** to the ALAB offices at the following address: **Aquaculture Licences Appeals Board, Kilminchy Court, Dublin Road, Portlaoise, Co. Laois, R32 DTW5**

Name of Appellant (Block Letters)*	MR JOHN HOLSTEAD
Address of Appellant	[redacted]
Eircode	

AQUACULTURE LICENCES APPEALS BOARD
28 SEP 2026
RECEIVED

Phone No.	N/A.	Email address (enter below)	
Mobile No.	[redacted]		[redacted]

* For administrative reasons, please provide one primary contact per appeal to which all correspondence in relation to the appeal will be sent. Please note if there is **any change** to the details given above, the onus is on the appellant to ensure that ALAB is notified accordingly.

FEES

Fees must be received by the closing date for receipt of appeals	Amount	Tick
An appeal by an applicant for a licence against a decision by the Minister in respect of that application	€380	
An appeal by the holder of a licence against the revocation or amendment of that licence by the Minister	€380	
An appeal by any other individual or organisation	€150	✓
Request for an Oral Hearing* (fee payable in addition to appeal fee) *In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded	€75	

Fees can be paid by way of Cheque or Electronic Funds Transfer

Cheques are payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 2021 (S.I. No. 771 of 2021)

Electronic Funds Transfer Details	IBAN: IE89AIBK93104704051067	BIC: AIBKIE2D

Please note the following:

1. Failure to submit the appropriate fee with your appeal will result in your appeal being deemed invalid.
2. Payment of the correct fees **must be received on or before** the closing date for receipt of appeals, otherwise the appeal will not be accepted.
3. The appropriate fee (or a request for an oral hearing) must be submitted against each determination being appealed.
4. The joinder of Appeals 42 (1) does not give rise to an entitlement to a refund of any fee paid to ALAB.(Appendix 1)

The Legislation governing the appeals is set out at Appendix 1 below.

SUBJECT MATTER OF THE APPEAL
Award of License to farm salmon at Deenish Island. T06-202.

Site Reference Number: - (as allocated by the Department of Agriculture, Food, and the Marine)	

APPELLANT'S PARTICULAR INTEREST

Briefly outline your particular interest in the outcome of the appeal:

I am a long time resident of Co. Kerry. I am an angler on Lough Currane and have witnessed the decline of seatrout and salmon numbers on the Lough and the consequent decline in the number of visiting anglers to Waterville along with the economic benifits they brought.

GROUNDS OF APPEAL

State **in full** the grounds of appeal and the reasons, considerations, and arguments on which they are based) (if necessary, on additional page(s)):

There are serious errors and omissions in the EPA prepared by Aquafact in the application. I will point these out and show the calculations that are neccesary to make the assessment more complete and accurate. This will done on additional sheets attached to this form.

CONFIRMATION NOTICE ON EIA PORTAL (if required)

In accordance with Section 41(1) f of the Fisheries (Amendment) Act 1997, where an Environmental Impact Assessment (EIA) is required for the project in question, please provide a copy of the confirmation notice, or other evidence (such as the Portal ID Number) that the proposed aquaculture the subject of this appeal is included on the portal established under Section 172A of the Planning and Development Act 2000. (See Explanatory Note at Appendix 2 below for further information).

Please tick the relevant box below:

EIA Portal Confirmation Notice is enclosed with this Notice of Appeal	
Other evidence of Project's inclusion on EIA Portal is enclosed or set out below (such as the Portal ID Number)	✓
An EIA was not completed in the Application stage/the Project does not appear on the EIA Portal	

Details of other evidence	PORTAL ID: 2021027		
Signed by the Appellant	[signature]	Date	26th Sept 2026

Please note that this form will only be accepted by REGISTERED POST or handed in to the ALAB offices

Payment of fees must be received on or before the closing date for receipt of appeals, otherwise the appeal will be deemed invalid.

This Notice of Appeal should be completed under each heading, including all the documents, particulars, or information as specified in the notice and duly signed by the appellant, and may include such additional documents, particulars, or information relating to the appeal as the appellant considers necessary or appropriate."

DATA PROTECTION – The data collected for this purpose will be held by ALAB only as long as there is a business need to do so. Legal requirements in respect of transparency may necessitate the publication of appeal and appellant details may be included in an online list of appeals.

APPEAL TO SALMON FARM LICENSE AT T06-202

JOHN HOLSTEAD

PAGE 1-2 .....HISTORY OF WATERVILLE FISHERY

PAGE 3-5 .....IMPACT ON THE LOCAL AREA

PAGES 6-10 ..... THE SALMON LICE PROBLEM

PAGE 11 - 12.....DECLINE OF SEA TROUT POPULATION

PAGE 13 ..... SUMMARY

The crux of this appeal centres on the demise of Lough Currane and the Waterville Fishery.
To acquaint the board with the fishery I give you a brief history of the fishery.

THE WATERVILLE FISHERY

Lough Currane is situated to the East of Waterville and covers an area of 2500 acres. It is linked to the ocean by a short river of 500yds.
The lake is fed by two rivers the Cummeragh and the Coppal, which in turn link to the upper lakes Derriana, Cloonoghlin, Namona, 1 Iskanamacteery, and Coppal.
These waters make up the Waterville fishery

In the sixth century AD, St. Finan Cam established a monastery on an island in Lough Currane, now known as Church Island. `the remains of a church, an Oratory, and several tombs can be found on the island.
The island is mentioned in the Annals of Innisfallen in 1058 where it is referred to as "Inis Assail".

Early mentions of fishery refer mainly to the short river, River Currane, that joins the fishery to th sea.
In 1604, a grant from James 1 was made to a Donell McCarthy that included a 'salmon wier" on the river.
A Friar O'Sullivan in the late 17th century stated, "the Currane river was very remarkable for salmon fishing".
A Charles Smith in 1754 referred to the excellent white trout (sea trout) and salmon in the river.
(Ref 1)
In 1827 Cosmopolite, the author writing in, *"The Sportsman in Ireland",* says of the traps in the river, "It was not uncommon to take 500 to 600 fish nightly".
(Ref 1)

On July 6, 1738 Arthur Anne Lucey Herbert lease the Fishery to Theobald Butler of Dublin for a term of 999 years
It was to remain in the Butler Family until 1963 when James W Butler, by then tenant for life, sold the property.
The first pool on the river is still known as the Butler pool and is one of the prime spots for salmon fishing

In 1963, the Fishing rights were purchased by Waterville house Ltd., later to become john A. Mulcahy Ltd. and remains in their ownership at the present day.
By 1963 the fish traps had removed giving the fish unfettered access to the rest of the fishery.

Fishing rights to the Lough Currane had long been disputed but by 1892 the Fishing was noted as essentially free and remain so to this day. Essentially this means that Fishery is the responsiblty of the state and is under the stewardship of Ireland Fisheries Institute. (IFI)

By the late 19th and early 20th century the lough had become renowned among sports fishers as a premier salmon and sea trout fishery.

In March1884, The Butler Arms Hotel opened to serve the growing number of visiting anglers and was closely connected with the development of Waterville as a fishing destination.
Among the guests at the Butler Arms were such luminaries as J.P. Morgan of banking fame, Walt Disney, and of course Charlie Chaplin who spent many summers there and fished the lake with ghillie Jack Sullivan. The Sullivan family, along with the Donnellys, the Sheas, the O'Dwyers were to provide a number of well known Ghillies down the years.

(The relationship between ghille and his employer is unusual in that the angler is beholden to the ghillies instructions and good ghillies are held in the highest esteem).

Lough Currane became known as the finest sea trout in Europe.
The introduction of outboard engines on the lake on the 1960's and improved transport in the country gave better access to the fishery and anglers and visitors from the UK and Europe increased.
This was to play an important role in the economy of the village as hotels, guesthouses, restaurants, pubs, etc. benefitted from the influx of anglers.
The growth was to continue but in the 1990's a collapse in the numbers of fish being caught started a decline.
This collapse is synonymous with the introduction of a salmon Farm at Deenish Island..

Ref.1 journal of Cork Historical and Archeological Society.

Much of the material for this appeal challenges the information given in the EPI produced by "Aquafact" for the applicant, MOWI.
Extracts from the Aquafact document are shown in italics

EPI (Aquafact) Vol. 2

From 5.1.2. Page 84 (Subject Population and human health).

To fully describe the impacts on human beings in the existing environment, an in-depth socio-economic
study would need to be carried out in the area to get a broad representation of the people's views.
This would be a major project in itself and is beyond the scope of this EIA. Therefore, to deal with the issue this EIA has drawn on similar studies and opinion polls carried out in areas of Ireland where aquaculture occurs. It is believed that while these studies may not necessarily reflect the views heldby local communities in the Kenmare Bay regionu, it is thought the general feeling of the communities to aquaculture would be similar and studies have been used to inform this EIA.

To overcome these perceptions and to achieve sustained prosperity from the development of a natural resource of the type used by aquaculture O'Connor et al. (1992) suggest that there must be:
• successful integration of economic goals with social and environmental priorities at all levels;
• these goals to be agreed by consensus at local and national levels; and
• an explicit policy favouring the development of a type of aquaculture and a structure for the
industry which merges with and supports the patterns of land use, lifestyles and occupations
of local communities.

5.1.2 of the report clearly states that no meaningful work was done in assessing the impact on the local population of the Deenish Island Farm project.

Some indication of the impact can be gauged by the reaction of Kerry County Council to the decision by ALAB to dismiss the revocation of the previous license at Deenish Island.
A motion was put before a full sitting of the council on Monday, 13th Oct, 2025 following a September 2025 determination by ALAB calling on the Minister to condemn the decision to overturn the revocation.
The motion was proposed by Councillor John Healey-Ray (Ind.) and seconded by Councillor Norma Moriarty. (FF)
Note that Councillor Moriarty (FF) represents the Waterville, Lough Currane area and more than anyone, would be aware of the impact the salmon farm has had on the area.
During the debate, matters concerning the damage to tourism and Angling, the protection of wild salmon and sea trout were raised.
The motion was passed unanimously.

Of over 300 written submissions written to ALAB, re the `ministers revokation, 99% were opposed to the re-opening of the salmon farm.

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Salmon farming has brought significant employment to remote parts of Ireland. Coastal areas which in the past have been characterised by a substantial emigration of young people can now provide a certain amount of suitable employment which avails of the boating and fishing skills endemic to the area.

This is a generalised statement and most certainly does not apply to the area in question.
The cost of the collapse of the sea trout and salmon populations on the Waterville fishery and its consequences for local business's dwarfs any economic advantage the salmon farm might give to the local community.
The full time employment opportunities on salmon farms is in fact quite small and has been consistently overstated by MOWI.
Prior to the presence of the Deenish Island salmon farm, there would have been in excess of 100 boats on the Waterville fishery. These would have been made up by privately owned boats, (These would have been paying mooring fees to local land owners), Boats for hire from local businesses, boats owned by local Ghillies (over 18).
Hotels and guest houses benifitted from the influx of anglers, as did local pubs, restaurants and retail shops.

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Fish farming can also be looked upon as a means of exploiting an abundant and ostensibly renewable natural resource at a time when stocks of wild fish are diminishing.

Exploiting is the right word. The salmon farming industry has long quoted that 1.7 tonnes of wild fish in the feed produces 1 tonne of farmed salmon.
A 2024 study published in *Science Advances* found the previous estimates were too optimistic. For carnivorous species such as salmon the inputs likely exceed twice the the biomass produced and could be as high as 5 times.
This "abundant and ostensibly renewable" natural resource is part of the food chain of all wild marine creatures, sea birds, whales and dolphins, etc. and will have local negative effects in the area they are taken from.
The API points out declining wild fish stocks as a reason for salmon farming. This logic is worthy of Lewis Carrol. You will inevitably have declining wild fish stocks if you remove 2 to 5 tonnes to make 1 tonne of farmed salmon.
Like the dreams of those that seek the perpetual motion machine, it is doomed to ultimately fail.
When it does we will be left with nothing.

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5.1.3. Conclusion

The existing licence and farm has a positive effect on local employment. The renewal application varies from the existing licence in that it requests change to the boundaries of the existing site and to the operating conditions attached to the licence. If approved, the requested changes will not lead to a significant increase in the number of staff employed but will ensure that the positive effect of the farm on local employment is maintained. If the licence is not renewed, there will be a negative effect on local employment with the loss of 10.5 onsite full-time employees and 7-11 part-time jobs from the local community.

The conclusion to section 5 clearly shows the absence of any enquiry into to what had happened on the ground and is at odds with a previous statement in the application that says there will be no increase in employment on the enlarged farm.

From 6.5.3 Page 121

6.5.3.1. Background

Sea lice are natural parasites of both wild and farmed fish. There are two main species found in Ireland;
Lepeophtheirus salmonis which infests only salmonids and while Caligus elongatus which is known to parasitise over 80 different species of marine fish (O'Donohoe et al., 2017). Lepeophtheirus salmonis is
the larger of the two species and is regarded as the more damaging parasite. It is endemic at a high prevalence (>90%) within wild populations (Jackson et al., 2013), and occurring frequently on farmedsalmonids (Jackson & Minchin, 1992; Jackson et al., 2005).

The phrasing of the above gives a false impression. Prior to the introduction of salmon farms, the numbers of salmon lice on wild fish were 'normal', not 'rampart', and not known to cause mortalities in smolts.
'Rampant', only became the operative word after the introduction of salmon farms.

6.5.3.

Modelling shows that lice larval numbers reduce dramatically in concentration with increasing distance
from the site with tidal average concentrations less than 0.1 larvae per m3 and generally not discernible
from background concentrations remote from the licensed farm sites. The instantaneous maximum
concentrations just outside of the licensed site is typically at 0.9 to 1.9 No /m3 and rapidly reduces to trace numbers.

The concentrations in the relevant danger spots, ie. Where smolts enter the sea from fresh water, would need to be compared against the concentrations prior the introduction of a salmon farm in the vicinity to have any value. In isolation after the introduction of the farm, they are meaningless.

From page 133 of Aquafact document

Lice fecundity peaks in spring, when infective copepodid stages appear to congregate near the river mouths, from which smolts emerge. The precise mechanism behind this phenomenon is not clear but it is likely that ovigerous female lice are carried into the inshore margins near estuaries on wild adult salmon, returning to their native rivers to spawn. By this means, a critical mass of descending smolts are met by a critical mass of waiting copepodids, such that a successful infestation ensues.

This perfunctory statement defies logic. The life cycle of the louse clearly stated earlier in the document does not tally with this statement The arrival of the salmon is spread over a wide time span and after a long journey from the feeding grounds. It spends a comparitavely short time near the river mouth and enters the river when when there is a sufficient flow of water to allow it access.
One can only assume this was added as a clumsy attempt to muddy the waters about the origin of the infective copepodids.

Lepeophtheirus evolved this strategy of infesting salmonid smolt during their migration, countless millennia ago, long before the advent of salmon farming. In fact, Lepeophtheirus must be very successful at host targeting because the clutch size of lice juveniles is quite small for a parasite that releases its young into open waters to complete its life cycle rather than directly onto a host species."

The appalling lack of logic continues. Every living organism is 'successful' by the fact that it is surviving.

The reason the louse has survived is because it was in balance with it's hosts.
Prior to the introduction of salmon farms, the salmon and sea trout survived for the same reason.

Let's see what happens when we introduce a salmon farm into the mix.

The average egg production in one year* by a female salmon louse is between 3,300 and 6,600. The number varies with temperature, salinity, and host density.
Let's be conservative and use the lower figure of 3,300.
Let's be even more conservative and assume that only 50% of the eggs go on to produce nauplii.
So from our single louse, we have 3,300 divided by 2 which gives us 1,650 nauplii.
Continuing in our conservative manner, let us assume one female louse per salmon.
MOWI will put 650,000 fish into there pens. From table 2.2 in the Aquafact EPA, we can see that the average number of fish prior to harvesting is approximately 600,000.

If we multiply 600,000 by the 1,650 we get 990,000,000 nauplii being introduced into the environment surrounding the fish farm that would not be there but for the fish farm's existence

That's an ultra conservative number.
In reality we are looking at over a trillion nauplii

(Should you require references to the scientific papers for the above, I can provide them. There are a lot.)

As previously stated, the modelling of sea lice density is only of use if it is compared with a model of sea lice densities prior to the introduction of a salmon farm.
The number of nauplii produced by wild salmon would have been minuscule compared to the trillion or more coming from the salmon farms.
Aquafact is not joining up the dots in it's contribution to the application.

The powers that be have claimed that it is not proven that the Salmon farm has an adverse affect on wild fish.
The interpretation of the science used to make this claim down the years has been limited.
Wether or not this limitation is deliberate or has not been properly thought through, I do not know.

I will now show the full effect of the science presented to the minister.

Planning applications for salmon farms have long depended on the Jackson et al paper (2013) to justify the effect of lice on wild fish populations.
This paper drew on the data of Jackson et al (2011, and 2011b).
Jackson et al concludes that only a 1% mortality of salmon smolts would be affected by the presence of a salmon farm and that this would be of little consequence to future stocks.
A paper by Krkosek et al (2013) published in The Journal of Fish Diseases points out fundamental methodological errors made by Jackson et al and puts the mortality of salmon smolts at 34%.
Serious questions need to be asked about the continued use of the Jackson et al paper.

However, even when the Jackson et al paper is used, The Marine Institute fails to point out that a salmon smolt mortality of 1% inevitably leads to a catastrophic mortality in sea trout smolts.
Whether this is by accident or design, I do not know, but it is a serious omission and should require all the advice given by Marine institute in regard to salmon farming to be treated with caution.

Allow me to show how a 1% mortality in salmon smolts inevitably shows the disastrous consequences for the sea trout.

The salmon smolt on leaving fresh water and entering the sea starts its migration to its feeding grounds.
The speed it travels is a function of its body length and is given as 4.39 bl/s.

(There are several references for the for calculating of the above. They all give more or less the same figures).

For the body length of the smolt let us assume a length of 15cm as a typical size, so the migratory speed of the smolt would be -

4.39 x 15/100 = 0.6585 m/s = 2.371km/hr

Using this speed, we can calculate the time the salmon smolt is at risk from Salmon farm produced lice.

If we assume that the salmon smolt must swim 40km to be clear of any risk of lice predation then the time taken to travel this distance is -

40 / 2.371 = 16.87hrs

From this we can see that the salmon smolt is at risk for approx. 16.87 hours during which time, according to Jackson et al, it will suffer a 1% mortality rate.

To extrapolate the mortality rate of the salmon smolt to the mortality rate of the sea trout smolt, we substitute the time the sea trout smolt spends in the 'at risk' zone and multiply by 1(%) to get the mortality rate of the sea trout.

How long is that? Well unlike the salmon smolt, the sea trout smolt does not migrate but stays close to the coast.
The time it spends at risk from lice predation is measured in weeks or months not hours.
This is precisely why the salmon farm is such a disaster for the sea trout.

There are a number of variables you can play around with but you will always arrive at a mortality rate that is catastrophic.
This is born out by figures observed whenever a salmon farm is situated in the vicinity of a sea trout fishery.
You need look no further than the Marine Institutes research facility on the Burrishoole fishery to see what happened to the sea trout there.
As I said in my introduction, Lough Currane is regarded as Europe's premier sea trout fishery not only because of the numbers of sea trout it supported, but because the average size of the fish was so high.
In the absence of fish counter records, for the Waterville fishery, (what happened to them?), I turned to the Irish Specimen Fish Committee's archives.

The Irish Specimen Fish Committee's, (ISFC), main aim is to verify specimen fish, (ie. Trophy fish), caught on rod and line by anglers in Ireland both in freshwater and in sea.
Each year they publish a comprehensive list of all the specimens caught in Ireland over the year.
The specimen size for sea trout is 2.722 kg (6 lbs)
I have collated the figures for sea trout from the ISFC archives from 1990 to 2024.

539 specimen sea trout were caught in Ireland in these years.
Of these, 502 came from the Waterville Fishery.

The ISFC name the angler who caught each fish and his or her nationality. These are are the nationalities that appear on the list.

136 British.
52 German
12 French
9 Dutch
7 Swiss
5 Belgian
3 Austrian
1 Australian
1 USA
1 UAE

(Note. For every angler who was lucky enough to capture a specimen fish, there would be hundreds who didn't). The number of foreign nationals in this list is indicative of the high number of foreign nationals who travelled to fish in Waterville).

The specimen sea trout could be 13 or more years old and would have spawned several times. They would have been better able to survive the ravages of the farm produced salmon louse while the smolt would not but given the presence of the salmon farm, they would eventually reduce in numbers.

This one simple table shows the prowess of Lough Currane, the international esteem in which it was held, and the effect the salmon farm had in it's demise.

Year	National Total	Waterville Total (Y)	Non Irish Anglers
1990	11	10	3GB; 2D
1991	16	16	2GB; 3D; 1CH
1992	36	35	12GB; 3D
1993	18	18	9GB; 1D; 2F; 1B
1994	28	26	4GB; 5D; 3NL
1995	12	12	5GB; 1D; 1A; 1CH;
1996	36	36	5GB; 10D; 1NL; 1B; 1CH; 1USA
1997	16	14	2GB; 2D; 1F
1998	26	25	8GB; 1NL; 1F; 1A
1999	11	10	3UK
2000	25	10	6GB; 1D; 1CH
2001	27	27	6GB; 3D; 1CH; 2F; 1NL
2002	33	31	8UK; 3D; 1F; 2B; 1A; 1AUS; 1UAE
2003	25	24	6GB; 1D; 1F; 1CH;1UAE
2004	22	22	10GB; 1D; 1I
2005	23	22	6GB; 3D; 2F; 1CH
2006	21	21	5GB; 1D; 1NL
2007	19	19	4UGB; 4D; 1B
2008	20	20	8GB; 1NL
2009	26	26	5GB; 4D
2010	20	20	7GB; 4D; 1F
2011	10	9	1GB
2012	6	5	1GB
2013	18	16	4GB; 3NL
2014	13	12	2GB; 1NL; 1F
2015	8	8	3GB
2016	5	4	1GB
2017	4	3	
2018	0	0	
2019	1	1	
2020	0	0	
2021	0	0	
2022	1	0	
2023	0	0	
2024	2	0	
TOTAL	539	502	

In this appeal, I have not mentioned the effect of disease in farmed salmon that could be passed on to wild fish, or the dangers of farm escapees inter breeding with wild fish. Nor have I mentioned my doubts about the bethnic testing.
These dangers exist but I am not qualified to discuss them in a meaningful manner.

I have stayed with the matters that I could show mathematically to be correct.
One may quibble about the minutiae of the figures used but the outcomes will stay more or less the same.
That the salmon farm is catastrophic to the sea trout population is beyond doubt.

At the beginning of this appeal, I gave a brief history of the Waterville fishery and explained the importance of the sea trout to the economy of the area.

If the minister, and now by extension, ALAB, are of the opinion that the premier sea trout lough in Europe, and all the sea trout fisheries on the West coast of Ireland should be sacrificed for the benefit of the people of Ireland, then they should explain why.

ALAB should use it's stated independence to allow this appeal.