From: [redacted]
Sent: Monday, December 11, 2023 5:00 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: T06/202 Deenish salmon farm

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I am writing to lodge my strong objection to the proposed continuing operation of this open cage salmon farm. Its negative impact on wild salmon and sea trout are well documented and supported by scientific research.

Regards

[redacted]
Castleconnell River Assoc

Sent from my iPhone

From: [redacted]
Sent: Monday, December 11, 2023 7:28 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Re: T06/202 - Fish Farm Application

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>
> Dear Sirs,
>
> I am writing to request that you decline the above application.
>
> As a visiting salmon angler for the last forty one years, i have witnessed the collapse of the salmon and sea trout runs in Ireland and Scotland.
>
> The sharpest collapses in runs, some including total wipeout, have all occured where aquaculture also now exists.
>
> Aquaculture has been proven to damage wild fish including smolts, attract seals and pollute inshore marine areas.
>
> Many anglers like myself are united in believing that we need less marine aquaculture, and more onshore closed system fish farming.
>
> For the above reasons, i strongly oppose the application.
>
> Kind Regards
>
> [redacted]
>
>
> Sent from my iPad

**From:** [redacted]
**Sent:** Thursday 14 December 2023 16:29
**To:** FinfishPC
**Subject:** T06/202 Objection to the Mowi planning application for Deenish

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam

I write in the strongest terms possible, as a Kerry resident, a keen angler, and a nature lover, to object to the planning application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

In 2019 it was recommended by the Irish Minister for Marine, Michael Creed, that the licence to Mowi for the site in question be withdrawn.

It is now clear worldwide that intensive salmon farming is not sustainable, producing questionable quality farmed salmon full of antibiotics and poisons to stave off disease and sea lice, and is destroying local salmon and sea trout stocks which it exposes to the same issues.

You will be aware that IUCN recently added salmon to its red list of endangered species, such is the devastating effect of salmon farms as a contributory factor.

What makes me especially angry is that there is a solution - Mowi move their salmon farming to enclosed on-land breeding tanks. However, they don't want to do this because it will cost more and eat into their precious profits. They would rather destroy nature and the environment and continue to attempt to avoid any action against them via expensive lawyers and state lobbying.

The fact that, in these circumstances, they have applied for planning permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be given.

Could you please acknowledge receipt of this email.

Yours faithfully

[redacted]

From: [redacted]
Sent: Saturday, December 16, 2023 3:00 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: T06/202 Objection to the Mowi planning application for Deenish

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam

I write in the strongest terms possible, as a Kerry resident, a keen angler, and a nature lover, to object to the licence application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

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The fact that, in these circumstances, they have applied for licencing permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be given.

Could you please acknowledge receipt of this email.

[redacted]

From: [redacted]
Sent: Saturday, December 16, 2023 3:48 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Expansion of salmon farming near Waterville, Co. Kerry

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir

Please do not permit the expansion of aquaculture in this area. Until the arrival of salmon farming, Lough Currane and the Waterville fishery was one of the best salmon and seatrout fisheries in Europe. Many people, myself included, journeyed from all over the world to fish it. Indeed, Waterville as a town was synonymous with fishing and in particular, for the unique strain of seatrout that have all but vanished since this filthy industry was allowed into Ballynaskelligs Bay.

I first fished Currane in 1972. Believe me, if Waterville had angling of the quality that existed in those days, the tills of every hotel, B&B, garage and restaurant in the surrounding area would be ring all summer long. Think of the next generation, think of Ireland's heritage. Please get the salmon farms out of South Kerry.

Yours faithfully

[redacted]

Sent from my iPad

From: [redacted]
Sent: Saturday, December 16, 2023 4:55 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: T06/202

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam

I write in the strongest terms possible, as a Kerry resident, a keen angler, and a nature lover, to object to the licence application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

In 2019 it was recommended by the Irish Minister for Marine, Michael Creed, that the licence to Mowi for the site in question be withdrawn.

It is now clear worldwide that intensive salmon farming is not sustainable, producing questionable quality farmed salmon full of antibiotics and poisons to stave off disease and sea lice, and is destroying local salmon and sea trout stocks which it exposes to the same issues.

You will be aware that IUCN recently added salmon to its red list of endangered species, such is the devastating effect of salmon farms as a contributory factor.

What makes me especially angry is that there is a solution - Mowi move their salmon farming to enclosed on-land breeding tanks. However, they don't want to do this because it will cost more and eat into their precious profits. They would rather destroy nature and the environment and continue to attempt to avoid any action against them via the use of lawyers and state lobbying.

The fact that, in these circumstances, they have applied for licencing permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be given.

Could you please acknowledge receipt of this email."

**From:** [redacted]
**Sent:** Saturday 16 December 2023 17:58
**To:** FinfishPC
**Subject:** Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam

I write in the strongest terms possible, as a Kerry resident, a keen angler, and a nature lover, to object to the licence application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

In 2019 it was recommended by the Irish Minister for Marine, Michael Creed, that the licence to Mowi for the site in question be withdrawn.

It is now clear worldwide that intensive salmon farming is not sustainable, producing questionable quality farmed salmon full of antibiotics and poisons to stave off disease and sea lice, and is destroying local salmon and sea trout stocks which it exposes to the same issues.

You will be aware that IUCN recently added salmon to its red list of endangered species, such is the devastating effect of salmon farms as a contributory factor.

What makes me especially angry is that there is a solution - Mowi move their salmon farming to enclosed on-land breeding tanks. However, they don't want to do this because it will cost more and eat into their precious profits. They would rather destroy nature and the environment and continue to attempt to avoid any action against them via the use of lawyers and state lobbying.

The fact that, in these circumstances, they have applied for licencing permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be given.

Could you please acknowledge receipt of this email."

**From:** [redacted]
**Sent:** Saturday 16 December 2023 18:37
**To:** FinfishPC
**Subject:** T06/202 Public Consultation on an Aquaculture Licence and Foreshore Licence Application

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,

I write in the strongest terms possible, as a Kerry native, a keen angler, and a nature lover, to object to the licence application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

In 2019 it was recommended by the Irish Minister for Marine, Michael Creed, that the licence to Mowi for the site in question be withdrawn.

It is now clear worldwide that intensive salmon farming is not sustainable, producing questionable quality farmed salmon full of antibiotics and poisons to stave off disease and sea lice, and is destroying local salmon and sea trout stocks which it exposes to the same issues.

The waste from salmon farms is detrimental to the sea flora and fauna. Cruel conditions to keep salmon in the pens. They suffer from deformities. There is no natural way for the fish to fight off sea lice.

You will be aware that IUCN recently added salmon to its red list of endangered species, such is the devastating effect of salmon farms as a contributory factor.

What makes me especially angry is that there is a solution - Mowi move their salmon farming to enclosed on-land breeding tanks. However, they don't want to do this because it will cost more and eat into their precious profits. They would rather destroy nature and the environment and continue to attempt to avoid any action against them via the use of lawyers and state lobbying.

The fact that, in these circumstances, they have applied for licencing permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be granted.

Regards,
[redacted]

**From:** [redacted]
**Sent:** Sunday 17 December 2023 07:11
**To:** FinfishPC
**Subject:** Salmon farm license

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam

I write in the strongest terms possible, as a conservationist, keen angler, and a nature lover, to object to the licence application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

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The fact that, in these circumstances, they have applied for licencing permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be given.

Could you please acknowledge receipt of this email."
Le meas,
[redacted]

**From:** [redacted]
**Sent:** Monday 18 December 2023 19:58
**To:** FinfishPC
**Subject:** Deenish

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam

I write in the strongest terms possible, as a Kerry resident, a keen angler, and a nature lover, to object to the licence application by Mowi to continue and expand their salmon farming at Deenish.

Mowi is a company that for decades has lied about its activities with disastrous effects on wild fish stocks and local fishing tourism.

In 2016, although it was licensed to harvest only up to 500 tonnes of salmon in any one year, it was discovered that it had harvested just over 1100 tonnes– over 121 percent more than permitted.

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What makes me especially angry is that there is a solution - Mowi move their salmon farming to enclosed on-land breeding tanks. However, they don't want to do this because it will cost more and eat into their precious profits. They would rather destroy nature and the environment and continue to attempt to avoid any action against them via the use of lawyers and state lobbying.

The fact that, in these circumstances, they have applied for licencing permission to retain and expand their activities at Deenish beggars belief.

Under no circumstances should permission be given.

Could you please acknowledge receipt of this email."

Regards
[redacted]

Sent from Yahoo Mail for iPhone

**From:** [redacted]
**Sent:** Wednesday 20 December 2023 15:40
**To:** FinfishPC
**Subject:** Deenish Fish Farm

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sirs,

I am writing to object to further licensing of the salmon farm off Deenish Island, Co.Kerry.

Since the creation of this fish farm in the 1990's there has been a steady decline in the stock of sea-trout in Lough Currane. The numbers of sea trout caught now are approaching zero. Where in the 1980's 30 to 50 boats could be seen daily on the lake now the figure is usually between 5 & 10.

The link between the welfare (survival) of sea trout and approximate location of fish farms is now beyond dispute. Basically you can have one or the other, but not both.

The only long lived sea trout population in Ireland live in Lough Currane. If the fish farm is allowed to continue this species will only be a memory.

Is this the legacy we want to build for our children?

Regards,

[redacted]

**From:** [redacted]
**Sent:** Wednesday 20 December 2023 22:04
**To:** FinfishPC
**Subject:** T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence, Deenish

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Hello,

I wish to objection to the issue of license for this application by Silver King Seafoods , a company which is part of Mowi who have a poor history in terms of handling of their fish and ecological impact.

Any risk to wild salmon, an endangered species needs to be removed and this should include fish farms and any renewal of licenses for salmon pen farms.

The assessments that mainly contain map data and little or no actual studies or past data on effects of the farms on wild salmon stocks. I believe the location of this and many other farms in the area have a detrimental impact on the wild salmon numbers and this is scientifically proven by multiple studies , hence the focus on sea lice.

The south west of Ireland is likely the worst possible location in the world to have any offshore aquaculture considering the natural currents off the shore of Ireland and the natural migration passage of the majority of Irish salmon and sea trout.

The assessment takes no consideration of eggs and larva from pen salmon carried on these currents along the migratory routes of wild fish.

The location is near multiple areas of special conservation and some of the few rivers left in all of Ireland with some stocks of wild salmon left that are now dwindling.

The assessment does not consider the past impact of this and other farms in the area that have inevitably lead to a mass decline in the salmon in these areas. These rivers include the Sheen river, the Rougthy river, the Ilen, Coomhola river, Kerry Blackwater, Currane. In addition migration from the Cork Blackwater, the river Bandon and the river Lee all pass this location. All of these rivers have declining numbers of adult fish despite healthy spawning beds and water quality shown by government studies. This of course shows that the main causes for decline lie at sea. There is no data on sea lice on wild juvenile salmon in the area as apposed to areas with no fish farms.

The currents run along the west coast where any larvae and eggs from parasites carried by the pen fish will be carried across many Irish rivers, most now closed or with restricted fishing activities.

The assessment does not consider recent IFI observations and current plans to apply restrictions on some of these rivers in the vicinity (Roughty) and the current restrictions on angling for wild salmon due to the risk. Given that a government agency(IFI) is currently looking to increase restrictions on angling due to concerns on fish numbers on a river in close proximity to the farm then it would be difficult to justify a fish farm that will knowingly affect the wild stocks being given a license by another government authority.

By renewing this license there will inevitably be more parasites, eggs and larvae in the water affecting the wild salmon and sea trout stocks, the planned schedule for checking sea lice numbers on the pen salmon is in itself an admittance that these pen fish will carry the parasite and so inevitably increase parasite number that will decimate juvenile salmon as they travel along the west coast to feeding grounds in the same water.

The area is a huge area for tourism which is one of Irelands biggest economic revenue, many of this is the in the surrounding area and includes salmon and seatrout fishing. A loss of the last few remaining stocks or further restrictions on recreational angling due to the decline will have huge impact in terms of revenue, loss of jobs both directly and indirectly relating to this. if tourists cannot complete their angling in SW and W Ireland they will travel elsewhere.

Please consider the poor location of the farm, the special area of conservation all around, the obvious past impact of these farms on wild salmon and seatrout as can be seen in all past data. Please consider the protection and responsibility to protect these wild stocks by all EU governments under (92/43/EEC) and the accepted parasites that farm fish will carry as noted in the assessments that will be "MONITORED" then treated. thus passing to wild stocks in their millions through egg dispersion along the west coast.

92/43/EEC wording presents that identifiable areas representing the physical and biological factors essential to their life and reproduction of wild salmon should be protected. Thus just not river habitats but any biological risk should be considered.

Thanks

[redacted]

**From:** [redacted]
**Sent:** Saturday 30 December 2023 22:21
**To:** FinfishPC
**Subject:** Objection to Salmon farming licence at site off Deenish Island

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may Concern,
I am objecting to the granting of an aquaculture licence to Silver King Sea foods for the proposed site east of Deenish Island on the following grounds
1. This company has already breeched the terms and conditions of licences previously granted to them in the past. By grossly overstocking cages in excess of double the amount of tonnage that had been allowed for in the terms of the licence granted .
2. The proposed area for the site sites are adjacent to Lough Currane which was once one of the best sea trout fisheries in Europe and has already seen a devastating decline in returning sea trout numbers in correlation with the development of salmon farming in the area.
It is known that the proliferation of sea lice caused by salmon cages has a devastating impact on both salmon and sea trout but more so on sea trout as they do not migrate and forage in the estuaries and bays close to their spawning rivers.
I have witnessed first hand the devastating affect that these farms can have on sea trout when last year I accompanied a marine biologists friend of mine working with the Loch Arbour Trust in Scotland when they were sampling sea trout in estuaries where salmon farming occurred. It was known that if the rate of sea lice exceeded 1 lice per 0.5 gram of fish than it was deemed to be fatal for the fish. All fish sampled had in excess of the fatal amount of lice with most having in excess of 3 times that amount.
3. The Atlantic Salmon is a Qualifying interest for SAC 000365
and the proposed cages are in a known migratory route for these animals. The threat from salmon farms to these animals is multifold and include the threat caused by the proliferation of sea lice to a unnatural level, the threat to the genetic integrity of wild fish from escapees, the proliferation of disease caused by high volumes of fish in the same location. Atlantic Salmon have seen a decline in these places due to a number of pressures and there should be every effort made to decrease these pressures and reverse the decline.
The fresh water Pearl muscle is also a qualifying interest for SAC 000365. This species reproductive ecology is dependent on returning salmon and could be put at further threat if returning salmon numbers continue to decline.
4. There will inevitably be a high volume of effluent discharged from hight numbers of fish kept in cages which will undoubtedly have a negative affect on the local environment.
If you require any further details from me, please do not hesitate to email me.
Yours Sincerely,
[redacted]

14

[redacted]




The Minister of Agriculture, Food, and the Marine
Aquaculture & Foreshore Management Division
Department of Agriculture, Food, and the Marine
National Seafood Centre
Clonakilty
Co. Cork
P85 TX47

28th December 2023

Dear Sir

Application to the Aquaculture & Foreshore Management Division for a salmon farm licence at Deenish Island, Co. Kerry by MOWI Ireland. Licence Site Reference: T6/202

I object in the strongest possible terms to the application by MOWI for a licence or renewal of licence to place an open cage salmon farm at Deenish Island, Co. Kerry.

[redacted] I am aware of the direct correlation or link between the advent of open cage salmon farming and the demise of wild sea trout and salmon populations on the West coast of Scotland.
Furthermore, having fished for sea trout and salmon in Connemara for some 50 years, there is ample evidence that the wild sea trout population in particular crashed with the advent of open cage salmon farming in the bays and estuaries of Connemara (& beyond).

The salmon farm lobby make much of local employment. The bit that they do not get is that the demise of wild sea trout and salmon runs, with direct links to their industry, displaces employment in angling services, tourism, hospitality, and the wider economy.
Furthermore, no account is taken of the people drawn to this area through their interest in game angling, to live, work and thus contribute to the local economy.

As the salmon farming industry becomes more automated, it is interesting to note in the Environmental Impact Statement (EIS) that cleaner fish co-ordinators, who could be assumed to be wrasse fishermen are now included in the employment tally.

The impact of removal wild 'cleaner' fish from the marine environment does not appear to be considered in the EIS, nor what ultimately happens to the cleaner fish post captivity.

Reading the EIS in relation to sea lice infestation, it is the usual spin and denial and little regard for sea trout.

[redacted]

Sea lice monitoring methodology is fundamentally flawed as it takes no account of the number of fish in the open cage salmon farm and thus the cumulative numbers of sea lice. The number of lice per fish is all that is monitored. The proposal is a significant increase in the capacity of this open cage salmon farm and thus sea lice numbers.

Salmon farm escapees are another negative of open cage salmon farming. With 13 rivers flowing into Ballinskelligs Bay, escapees pose a significant adverse impact on wild salmon populations.

It is my understanding that farmed salmon have interbred with wild salmon, which can be traced by study of genetics.

The applicant has stated that this has not been known to occur in Ireland but fails to comment as to whether it has taken place in other locations in which they operate such as Norway. No look, no see comes to mind.

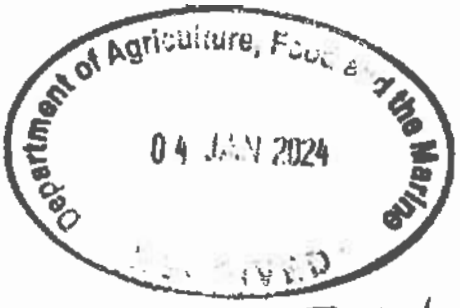
For the applicant to summarise that 'there will no significant effect on fisheries' defies common knowledge and science.

I would be grateful if you would bring my objection to the Minister's notice. I will be copying this letter to all my local TDs and the Minister for the Environment in the hope that this licence is not granted, that salmon aquaculture is brought onshore in closed facilities and existing open cage salmon farms are closed.

I would be obliged if you would acknowledge my letter.

Yours sincerely

[redacted]




[redacted]

3rd Jan 2024

Ref T06/202

Attached is a copy of my letter of the 8th of August last to Minister Eamon Ryan, to which I did not even receive an acknowledgement of receipt!

I reiterate all I stated to minister Ryan and implore you not to grant any such licence unless the "site" is land based. It would otherwise mean Curraune would never recover and be such a destructive development.

Wait to hear,

[redacted]

Minister Eamon Ryan TD
16-17 Suffolk Street
Dublin D02AT85

[redacted]

8th August 2023

Re: Fish Farm Application for Ballinakill Bay

Dear Minister,

I have just learnt that MOWI (formerly Marine Harvest) have applied for a licence to install a salmon fish farm, consisting of 22 cages between Ballinakill Bay and Cleggan Head.

I fervently hope permission will be refused as, if granted, I have no doubt it will constitute the "final nail in the coffin" so far as fishing for salmon and sea trout in the Dawros River and Kylemore lakes is concerned. It is already a shadow of what it was in the early 1980s, certainly caused by the already licenced and functioning salmon fish farm in Ballinakill Bay.

The current state of sea trout fishing, in particular, in Ireland is an absolute disgrace. Due entirely to the adverse effects of the presence of salmon fish farms at sea. They should all be land based so that effluent is properly harvested, treated and properly disposed of, escapes prevented and sea lice infestations eradicated! Sure it would be more expensive for the likes of MOWI but the benefits for the environment generally, Wild Salmon (smolts) and sea trout, warrants such a strict requirement.

Every year in the early 1980s I and a couple of friends spent two weeks in Connemara fishing for sea trout at such wonderful fisheries as Costello & Fermoyle, Screebe, Delphi, Inagh, Zetland, Inver, Crumlin, Leslie Lyons and when we could afford it Ballynahinch. They were magical in terms of numbers and quality of fish. Just enough caught kept for a late night dinner after the mandatory pints. It was Mecca!

In [redacted] I was fortunate enough to be able to purchase a holiday home [redacted] intending to spend every summer thereafter fishing there for sea trout. Alas that year Connemara sea trout fishing collapsed owing to the effects of the introduction of salmon fish farm cages at sea in and around the bays the above mentioned river systems emptied into.
When the sea trout fishing did not recover I sold up.

A similar collapose occurred with the sea trout fishing in Lough Currane by virtue of the introduction of salmon fish farms in the coastal vicinity of Waterville. Nobody goes there now to fish for sea trout simply because there are none!! Subsequent to the initial introduction of salmon fish cages and the consequential detrimental effects to sea trout fishing there were a couple of years when tere were no salmon in the cages and the sea trout made a return but since the salmon farming has recommenced the sea trout have again vanished. But for the facgt that a "sufficient" number of salmon went into the Currane "system" in the last two years it would have been closed for fishing in 2021 due to an almost complete absence of sea trout – a local fisher officer remarked to a friend of mine.

Attached is an extract from the late and great Peter O'Reilly's book "Trout and Salmon Loughs of Ireland" describing Lough Currane fishing in the mid eighties. The demise of the sea trout there amounts, to me, as a "crime against humanity"! If you need any coroboration as to the appalling state of sea trout fishing on Lough Currane I suggest you contact gillies, [redacted]

I and my friends have been desperate for decent sea trout and salmon fishing since it's collapse in Ireland, particularly the former. In the mid eighties owing principally to the introduction of salmon fish farms at sea more rivers are currently closed than open! As a consequence each year we travel abroad to fish. We have been to Argentina (Tierra del Fuego), the Falklands, Iceland, England, Scotland, Norway and Russia. The latter three several timees. But for Covid we would have returned to Norway in 2020 and 2021 and did so again in 2022 and 2023. As you can appreciate, overseas trips are at a considerable expense. If the sea trout and salmon fishing in Ireland currently was what it was in the early 1980s, we would not consider leaving Ireland, albeit we would have to compete with British anglers for the fishing here, as they would once again flock back to the west and south-west of Ireland each summer with all the economic benefits for the local communities. It is simply a matter of requiring the fish farms to be land based so they can be properly controlled and correctly regulated.

In the early 1980s one was very fortunate to get a boat on Lough Inagh or any of the other Connemara fisheries such was the demand, particularly from English anglers, who stayed, ate and drank in the locality. Since 1986 to this day one

could have any number of boats, (if still "seaworthy") and may even be "lucky" to ahve the lake to yourself!

As to the restoration of quality salmon and sea trout fishing, a good starting point is what occurred on the East and West Ranga river in Iceland which I have fished. It went from nothing to thousands of fish in a short number of years with huge economic benefits as a consequence.

I implore you to ensure that the MOWI appllication is refused and that all future licences for salmon farming are only granted subject to the condition that the farms are land based at an appropriate stipulated distance from any river to prevent escapes at times of flooding.

Wait to hear your considered response.

[redacted]

**From:** [redacted]
**Sent:** Saturday 6 January 2024 21:52
**To:** FinfishPC
**Subject:** MOWI at Deenish Island

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Dear sir
I would like to lodge an objection to the proposed MOWI salmon farm licence at Deenish Island, on the basis that it is perilous to the already devastated salmonid populations breeding and migrating in the very same catchment.

Please do more to protect our precious native marine species, especially the culturally iconic Salmon.

Is mise le meas
[redacted]

**From:** [redacted]
**Sent:** Sunday 7 January 2024 21:16
**To:** FinfishPC
**Subject:** Ref TO6/202

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Ireland has some of the last pristine waters left in Europe and is home to.an indigenous species of Atlantic salmon that has genetically evolved over thousands of years.The scientifically proven dangers of fish farms are sealice infestation ,biodiversity loss,chemicals,pollution,interbreeding with wild stock,disease, decomposing fish,increased bacteria, cramped conditions, antibiotic overuse,and the list goes on.Many countries are spending millions on restoring their native salmon stocks while lreland seems hellbent on destroying its own ecosystem in order to make a quick buck.l am totally opposed to any form of fishfarming on lrelands pristine coastline for the reasons l have outlined.

[redacted]

**From:** [redacted]
**Sent:** Monday 8 January 2024 12:52
**To:** FinfishPC
**Subject:** Submission to public Consultation T06/202
**Attachments:** Submission copy.pdf

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,
Please find attached my submission to the Public Consultation re Application for aquaculture licence ref. no T06/202
A hard copy will follow.
Please acknowledge receipt of same.
My regards
[redacted]

--
[redacted]

# Submission to Public Consultation re Application for Aquaculture license at Deenish Island

## Application ref. No. T06/202

**For the attention of -**
**Minister for Agriculture,**
**Food and the Marine,**
**Aquaculture and Foreshore Management Division,**
**National Seafood Centre,**
**Clogheen, Clonakilty,**
**Co. Cork, P85 TX47**
**FinfishPC@agriculture.gov.ie**

**Submission by -** [redacted]

**Applicant**

**Silver King Seafoods Ltd**
**Mowi Ireland, Kindrum, Fanad, Letterkenny, Co. Donegal.**

## Introduction

In this submission I will first question entries in the application form that I consider to be incorrect or questionable.

I will then conclude with raising matters that are not mentioned in the application but are of the upmost importance and relevant to this application.

I am making my argument against a large and powerful international company. A company with a turnover of some €36 billion and will consequently have access to any number of lawyers and lobbyists.

I do not have access to such resources and my submission may not be as professionally presented as the Application. However I trust that whoever is tasked with adjudicating on this matter will accept that the issues I raise will be given the same consideration as the applicant.

Extracts from the Application are copied in the following submission.

# The Application

# Part 1: Preliminary Details (Page 2)

| **TYPE OF APPLICATION** – please indicate relevant type of application<br>This Application Form is valid for each type of application - ***See Guidance Note 3.1*** | |
|---|---|
| (i) Aquaculture Licence | |
| (ii) Trial Licence | |
| (iii) Foreshore Licence, if Marine Based | |
| (iv) Review of Aquaculture Licence | Y |
| (v) Renewal of Aquaculture Licence | Y |

By indicating *(iv)* and *(v*), the applicant pre-supposes that a license exists.

It does not.

Minister for the Marine, Mr Michael Creed TD revoked the License in April 2019

To my knowledge, no appeal against this decision by the Minister has been heard so his decision stands.

Hence,this application is invalid.

# Part 2.1 Marine based Aquaculture-Finfish

(Page 4)

(xiii) Reasons for site selection: (refer to Environmental Impact Statement – EIS)

**The T6/202 Deenish site is located off the eastern side of the uninhabited Deenish island, which is situated off the coast of Co. Kerry between Ballinskelligs Bay and Kenmare Bay. Salmon production has been operating at the site since 1995. Between 1995 and 2004 the operations at the site were undertaken by three operators namely, Silver King Seafoods Ltd., Murpet Fish Ltd. and Gaelic Seafoods (Ireland) Ltd. Since 2008 the site has been operated by Comhlucht Iascaireachta Fanad Teoranta (CIFT) trading as Mowi Ireland. The licence transfer is in progress.**

(xiv) Is the site located in/adjacent to a sensitive area e.g. SPA (Special Protection Area) or SAC (Special Area of Conservation) i.e. a Natura 2000 site? (Refer to Guidance Note 3.3.1.- Natura 2000 sites)

If yes give details.

**Yes. The Deenish Island site is located in the Kenmare River SAC (Site code: 002158).**

*(xiii)* This statement says nothing about the reasons for selecting the site other than the site was used for salmon farming in the past prior to the License being revoked.

*(xiv)* This Information is sparse to say the least and is selective in refering only to, *Guidence note 3.3.1 - Natura 2000 sites.*

From this Guidence - **Natura 2000 -** clearly states :-

***3. THE POTENTIAL IMPACTS OF AQUACULTURE ACTIVITIES ON NATURE AND WILDLIFE***

We get -

***3.1 The need for a case by case approach – relevant factors***

*All types of farming interact with the environment, and aquaculture is no exception. Potential effects of different aquaculture systems are widely described in the scientific and technical literature. Those effects are highly specific to the site and depend on the environmental and rearing conditions. Any possible risks must be assessed taking into account all the relevant features and their specific condition as well as the conservation objectives of the relevant site. It should be also stressed that possible negative effects may be mitigated with appropriate management, location etc.*
*There are many factors that influence the ultimate impact of aquaculture. Among these, the location of the farm, the type of cultured organisms (fish, crustaceans, molluscs, other invertebrates and seaweeds) and the methods used (eg. quantity and type of food, stock density, chemical use) determine the environmental impact of the different kinds of aquaculture activities. Moreover, the sensitivity or vulnerability of the environment to possible pressures from aquaculture activities is also a key factor. All these factors determine the assimilative capacity of the environment to aquaculture activities.*

I contend that no consideration was given to the impact of the effect of farm T06/202 site placement on elements of the surrounding enviroment.

Warnings were given in the strongest of terms that the farm would have a catastrophic impact that would be caused to the Sea trout population in the Currane watershed and other nearby systems.

Sadly, within one Year of the farm commencing operation, these prophesies were to prove all too true. (There will be more on this below).

There is little ,if anything, in Section 3 of Natura 2000 sites guidance that supports the placing of the farm on the site in question yet this is the only supporting evidence given in the application.

# **Section 2.6** (Page 14).

**2.6 Employment, Qualifications, Experience, etc**
**TO BE FILLED IN BY ALL AQUACULTURE APPLICANTS**

(i) Please provide details of experience/qualifications of the applicant and any key personnel which are relevant to the aquaculture now proposed:

**Silver King Seafoods' assets in the vicinity of Kenmare Bay and Bantry Bay were acquired by CIFT in 2008/2009. CIFT has been farming salmon in Ireland since 1979 at locations in Donegal, Mayo, Cork and Kerry. The Company is fully integrated with breeding, on-growing, harvest, processing and sales facilities in Ireland. The company currently employs 300 FTE staff in Ireland. This proposed site will employ at minimum 7 FTE staff.**

(ii) If a new application please provide details of projected employment creation during first four years of the proposed aquaculture project:

(iii) In the case of a renewal please provide current and future details:

**At minimum 7 full time equivalent staff will be employed on site for fish husbandry and site maintenance. Site staff will be supported by the Mowi Ireland sub aqua dive team, an in house Veterinarian and Technical support staff.**

**FULLTIME JOBS**

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Year 1: | 7 | Year 2: | 7 | Year 3: | 7 | Year 4: | 7 |

**PART TIME JOBS**

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Year 1: | 0 | Year 2: | 4 | Year 3: | 0 | Year 4: | 4 |

I would question the number of full time employers that the Company employs but as I have no way of showing otherwise I will take it at face value.

However, the number of Employees to be engaged locally on farm T06/202 is to be 7.

Any employment in the area is to be encouraged but in this case the employment of these 7 comes at the cost of the loss of employment in the Community that has been caused by the effect of the farm on the local enviroment.

Prior to the commencement of salmon farming in the area, Lough Currane and the surrounding rivers and Lakes were World renowned for the quality of

the sea trout fishing. Anglers would travel from all parts of the World to fish its waters.

Of the specimen sea trout (Fish over 6lb wieght) caught in Ireland, 94% came from the Currane catchment. (It has been suggested that the Currane sea trout had a unique genetic strain but I know of no research to support this).

These anglers would engage the services of boatmen and ghillies. In excess of 20 of such.

The visiting anglers would stay in the local Hotels, Guest houses, B&Bs, and rental homes.

They would dine in local restaurants and utilise the local shops.

They would drink, (a lot), in the local bars.

The employment and money the anglers would pump into the local ecomony puts into the halfpenny place any benefit the salmon farm gives.

With the coming of the salmon farms, the sea trout Fishery has, as predicted, collapsed, and with it all the benefits the Fishery gave to the locality.

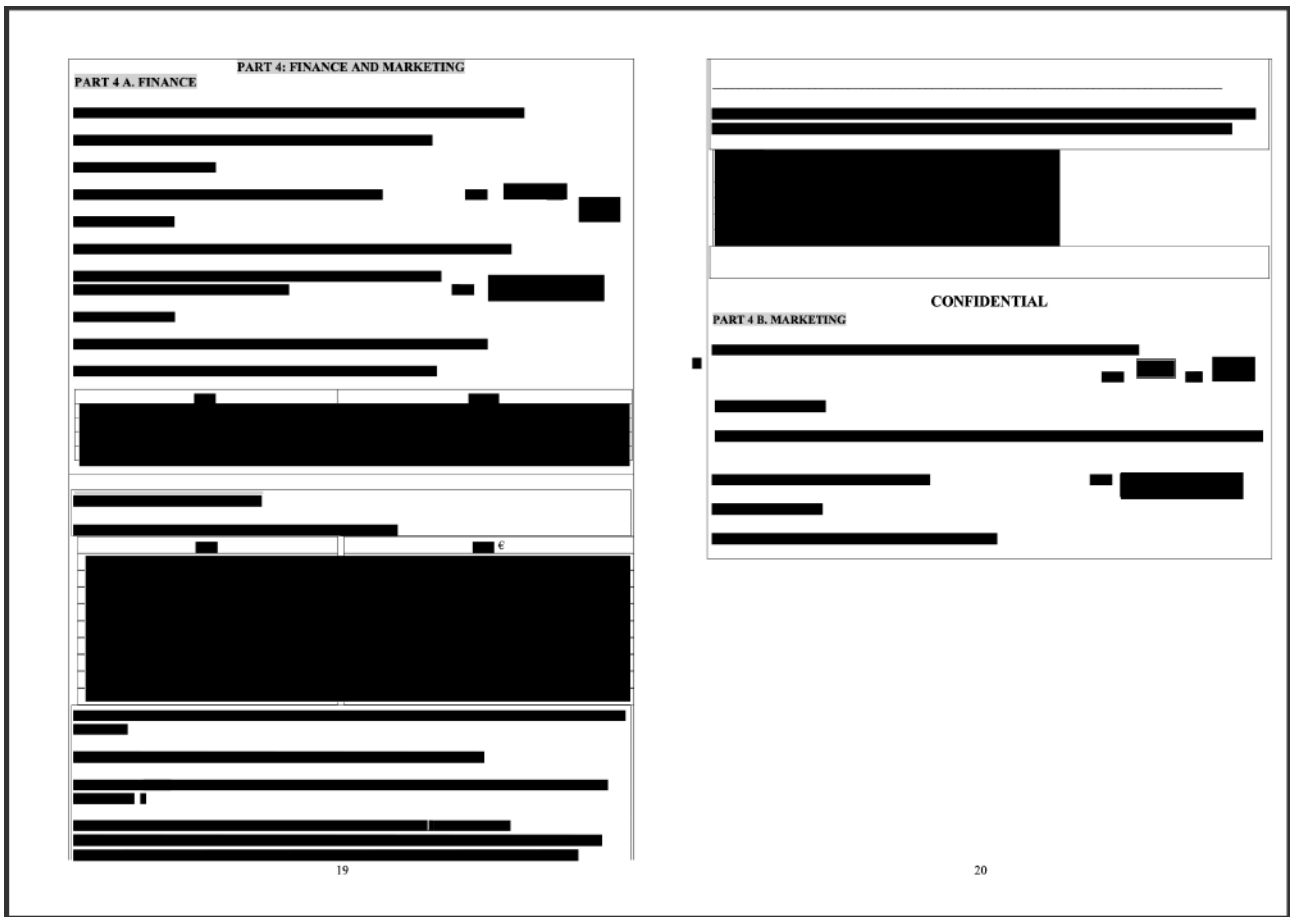
This is not an irretrievable situation. If the salmon farm were to be removed, within a short few years nature would ensure that the sea trout stocks would be rebuilt and the Currane Fishery, and all the benifits that the locality from the Fishery would be restored.

During the period 2005 to 2010 the farm was closed and a marked improvement in the wild salmon and sea trout stocks took place, only for it to collapse again when it re-opened.

# PART 4: FINANCE AND MARKETING

## PART 4 A. FINANCE

The Financial and Marketing section has been redacted in its entirety. (See below), so we are left in the dark as to what benifit, if any, this farm will give to Ireland. As shown above, the farm will be of little benifit to the locality. Far from it.



# Documentation supplied with Application

## EIA statement Vol.1 (Vol.2 appears to be a copy of Vol.1)

The EIA has been pepared by ‘AQUAFACT’.

It reads like a promotional pamphlet for MOWI rather than a serious study of the enviroment in the vicinity of the proposed salmon farm.

Page 5 of the Report refers to an ‘existing license’.

As stated at the beginning of this submission, there is no ‘existing License’.

Page 12 lists the birds and fish found in the area.

**The most important species to the Community surrounding the farm is the sea trout which they conveniently omit, albeit that thanks to the salmon farms, it is now an endangered species.**

It states that,*”Given the nature of salmon aquaculture and the relatively small spatial overlap of the proposed site with nursery or spawning grounds, potential significant effects will not occur’.*

**This is just plain wrong.**

As mentioned elsewhere in the Report there will be small amounts of food falling through the cages. This is going to attract fish where the will be showered with faeces and sea lice lava.

On page 11 it states that the bulk of the waste is ‘organic’.

Well pretty much all faeces from living creatures is organic. Imagine a couple of thousand tons of homo sapien confined in cages and doing their number

2's on top of you. It may eventually dissipate but to pretend it will have no effect is just nonsense.

On page 13, the sea-trout at last gets a mention along with the adverse effect that sea lice have on salmon and sea trout.

Mowi according to this report have developed a new strategy for controling sea lice.

What tests, if any, did Aquafact carry out to show the efficacy of this new treatment? As this is one of the roots of the opposition to this Application, it is of the upmost importance that this new strategy be subject to rigorous Scientific Analysis to show, and be shown, that it works and has no adverse effect on the finished product of the farm. This needs to be done before the Application is considered.

The Community has been told many times that MOWI have a solution to the sea lice problem, some quite frightening.

None of them have worked.

# Report supporting the Appropriate Assessment Screening

*"Articles 3 to 9 of the European Community (EC) Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna (commonly known the Habitats Directive) provide the legislative means to protect habitats and* ***species of community interest*** *through the conservation of an EU-wide network of protected sites known as Natura 2000 sites."*

This is the opening paragraph of the AAS report.

Nowhere in this report is the sea trout mentioned albeit that the sea trout is the species of most Community interest.

It is as if the Marine Institute are deliberately ignoring the species and serious questions need to be asked of them why this is so.

They cannot be ignorant of the problems caused to the sea trout fisheries up and and down the Western sea board. Nothing has garnered as much publicity as this problem in regard to Salmon farms.

This report should be returned to its authors so that the problems created by the salmon farms to sea trout stocks can be addressed.

*"The site would always be operated under the organic standard[11], effectively limiting peak stocking density to 10 kg fish per $m^3$ water."*

**An organic salmon is born in its birth river where it remains until it reaches the smolt stage whereupon it migrates to its feeding grounds in the ocean. It rapidly increases in wieght and then returns to its birth river where it mates and the process begins again.**

Farmed 'organic' fish is a misnomer,.

There are standards that must be adhered to for a farm to label its product 'organic', which one presumes is an improvement on the farming methods, but it does not make them organic.

It is unfortunate that that these standards do not take into consideration the welfare of the true 'organic' salmon.

# SUMMARY

Not for centuries has there been sufficient wild Atlantic salmon to satisfy demand as a food source in a sustainable way.

Wild salmon, along with sea trout, have long been regarded as a sport fish and there value to the economy as such is estimated to be in excess of €5000 per fish. (This is the sum the angler pumps into the economy per fish caught).

Obviously this is dependant on sufficient wild fish entering the Irish rivers to warrant the local and visiting anglers casting thier lines.

These magnificent fish that play such a large part in Irish mythology and stories are, of course, deserving of preservation simply because they are what they are.

They don't need economics to make them more amazing.

The concept of farming salmon would seem to be a sensible one. Leaving the wild fish to thier ways while the farmed fish provide an affordable food source.

The wild fish and the farmed fish are different beasts. It is not possible to replace wild fish in the River with farmed fish. You would quickly end up with no fish in the River.

With the onset of salmon farming, it quickly became apparent that the farms were having an adverse affect on the wild stock. The caged salmon attracted sea lice in densities many multiples of the density found in the wild. The larva of the lice falls thro' the cages  The wild migratory fish have to run the

gauntlet of these parasites and are infected by them in such numbers that they are unable to survive.

The most vulnerable are the smolts,the young fish leaving the river and entering the Ocean for the first time and needless to say, these are essential to maintaining a healthy stock of fish in the rivers.

The lice are, of course, not welcomed by the farms. (Think maggots on a flock of sheep), and they have tried and continue to try to eradicate the parasites but without success.

Until a proven method of controlling the lice is discovered, it is imperative that salmon farms are kept well away from river systems that have a population of migratory fish.

We are now 25 years or so on and the problems have long been apparent. The consequences have been catastrophic for the wild native species yet nothing has been done.

By refusing this Application and enforcing the removal of the farm you will be striking a blow for future generations of Ireland to come.

Only by pressurizing the farms to come up with a sustainable way of farming will they alter there ways on what is a highly profitable business.

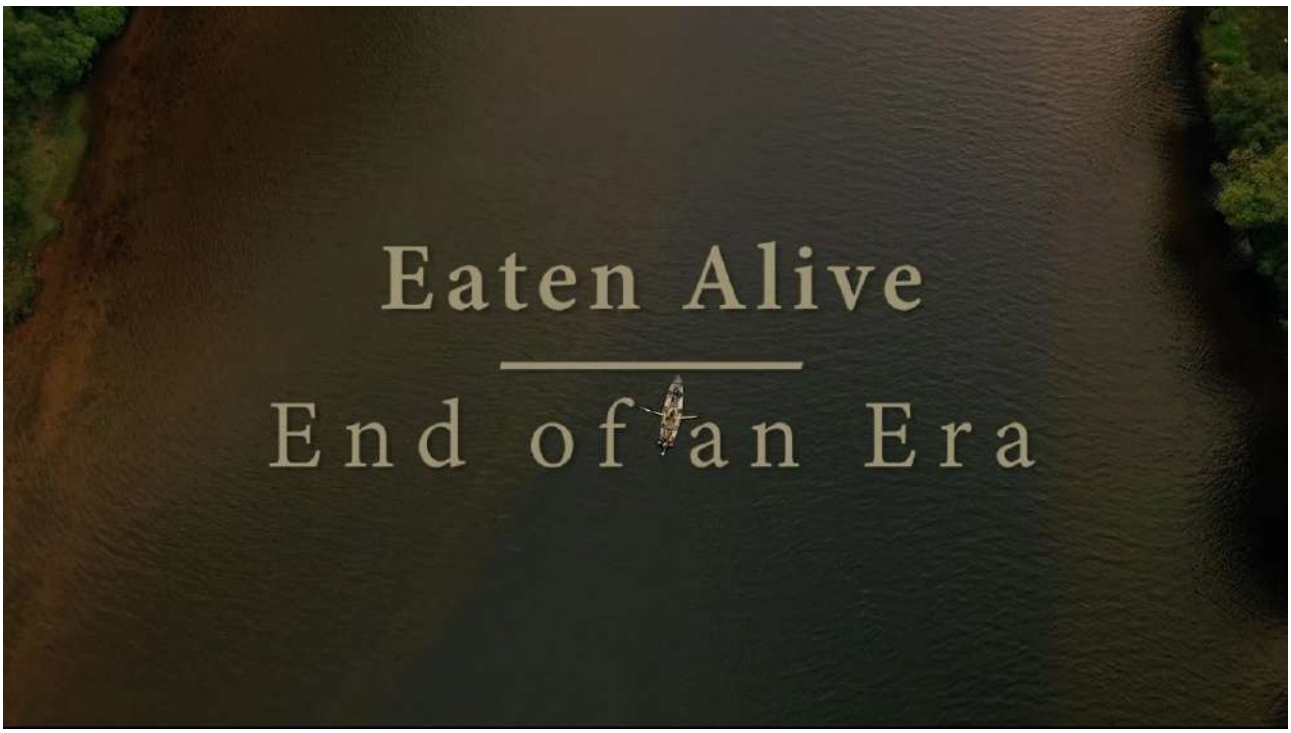
As I suggest in the above submission, the legality of this Application is in doubt`as the applicant does not hold a License for this site, the original License being revoked by the Minister for the Marine.

However, should the Application be considered, I surmise that I have shown sufficient reason why it should be rejected and the farm removed.

For many years Mowi and it’s previous guises refused to accept that sea lice infestation had a catastrophic effect on migratory finfish yet the evidence and trail of destruction they have left behind them is now undisputable.

The effects on the localities where salmon farms are placed is well documented. Loch Maree in Scotland would have shared a similar reputation to that of Lough Currane in Ireland. I ask you to view this short video that shows how the fish in Loch Maree have suffered and the effect it has had on employment.

It is difficult to understand how the Deenish Island farm has been allowed to continue operating without a License, particularly when their License was revoked by the Minister for gross abuse of the conditions set down in the License.




Is Mowi above the Law?

Click on video or us link below
Link to video ———youtube.com/watch?v=4_dfbbkkVjs

[redacted], and more are families who for generations have earned their living guiding anglers from all over the world who have come to enjoy the wonders of Lough Currane.

Their knowledge of the Lough, its rivers, its salmon, and its sea trout has been passed down from Father to sons and it's value is beyond measure.

We are dependant on the members of the panel adjudicating this application and those in similar positions, to protect the people of Ireland from the excesses of big business; to ensure the precious knowledge enshrined in the

local ghillies is protected; and that the salmon and sea trout for which Ireland is famous is restored to its former glory.

**The Joy of Fishes**

Chuang Tzu and Hui Tzu were crossing Hao River by the dam.
Chuang said: "See how free the fishes leap and dart: That is their happiness."

Hui replied: "Since you are not a fish how do you know what makes fishes happy?"

Chuang said: "Since you are not I, how can you possibly know that I do not know what makes fishes happy?"

Hui argued: "If I, not being you, cannot know what you know it follows that you not being a fish cannot know what they know."

Chuang said: "Wait a minute! Let us get back to the original question. What you asked me was 'How do you know what makes fishes happy?'

From the terms of your question you evidently know I know what makes fishes happy.

I know the joy of fishes in the river through my own joy, as I go walking along the same river."

The Way of Chuang Tzu by Thomas Merton,

**Think on this.**



**From:** [redacted]
**Sent:** Monday 8 January 2024 22:33
**To:** FinfishPC
**Subject:** T06/202

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**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a lowebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12thOctober annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

[redacted]

**From:** [redacted]
**Sent:** Monday 8 January 2024 22:24
**To:** FinfishPC
**Subject:** Reference T06/202

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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

**From:** [redacted]
**Sent:** Monday, January 8, 2024 9:36 PM
**To:** FinfishPC <FinfishPC@agriculture.gov.ie>
**Subject:** Objection

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Signed

[redacted]

Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 8 January 2024 21:29
**To:** FinfishPC
**Subject:** Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a lowebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12thOctober annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.
Signed

[redacted]
Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 8 January 2024 21:06
**To:** FinfishPC
**Subject:** Reference T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,
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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Kind regards

[redacted]
[redacted]
Blackwater Trout & Salmon Fishery
[redacted]

**From:** [redacted]
**Sent:** Tuesday 9 January 2024 11:29
**To:** FinfishPC; [redacted]
**Subject:** Deenish application T06/202

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To: The Minister for Agriculture,
Food and the Marine, Aquaculture and Foreshore Management Division
The National Seafood Centre,
Clogheen,
Clonakilty,
Co Cork,
P85TX47

Reference: **T06/202**
Aquaculture Licence and Foreshore Licence application for salmon farm at Deenish Island, Co Kerry.

Dear Sir/Madam,

I wish to object, with every fibre of my being, to the renewal or extension of a permit allowing the multinational conglomerate Mowi run a salmon farm at Deenish in Ballinskelligs Bay, Kerry.

As has been established beyond any doubt whatsoever, salmon ranching has a huge, negative impact on its immediate environment. It spreads unprecedented levels of disease and pollution while producing highly questionable, synthetic food all too often in conditions that would not be tolerated on land. It also introduces significant quantities of toxic chemicals to once pristine waters inevitably degrading them. In the case of Deenish, the farm has been **the** major factor in the absolute destruction of the once-magnificent, world-rated salmonoid fishery at nearby Lough Currane. Unless dramatic action, including the complete closure of the Deenish salmon farm, is taken quickly that shameful situation cannot be reversed.

That the salmon farm's Norwegian owners treated the terms of their last permit, and by extension this country, with utter contempt when they dramatically exceeded permitted production levels and all that entails, shows that they will happily betray any trust you might place in them. That they do this while knowingly causing such destruction confirms that they epitomise the kind of regulation-adverse, industrialised food production that is such a crisis for humanity. This probability is exacerbated by the alarming degree of self-regulation permitted in this sector, a latitude that will inevitably be exploited and one generations to come will regret. That we are prepared to squander such a magnificent natural resource for the sake of a few very moderately paid jobs instead of the relatively lucrative jobs supported by Lough Currane in its heyday will also be questioned by those generations.

For these reasons and for those other objectors will undoubtedly present, I implore you to reject the application.

Yours faithfully

[redacted]

Minister for Agriculture, Food and the Marine,
Aquaculture & Foreshore Management Division,
National Seafood Centre,
Clogheen,
Clonakilty,
Co. Cork.
P85 TX47

Reference: T06/202 January 7th 2024.

Dear Minister,

This submission requests that the Minister **rejects** the renewal of the aquaculture licence T06/202 requested and operated by Silver Kings Limited / MOWI at Deenish, Co. Kerry.

This Company, Silver Kings Limited / MOWI, has a very chequered history in relation to salmon farming in Ireland in so far as they have been repeat offenders in overstocking / overharvesting at a number of their Irish salmon farming sites. This has been well documented and indeed the Minister for Agriculture, Food and the Marine in May 2019 made a determination that this said Company breached their licence at this site by overharvesting by a very significant degree ( almost by 122% of the permitted level under their licence !).

Environmental protection is a critical responsibility for all responsible Governments and is particularly apt for your Department of Agriculture, Food and the Marine in Ireland. Globally the scientific authorities have come to the conclusion that it is now time that ALL open sea cage salmon farms be closed down and moved to on-land Closed Containment Systems (RAS) as a matter of urgency. The science is clear, the technology is available and Companies participating in the Aquaculture Industry have no excuses but to conform going forward. Regulatory Authorities and Government Departments must be strong enough to require 'Responsible Production' in the interest of environment protection and sustainability ..... Continuing to allow breaches of licence regulations, failure to police and manage the existing regulations and failure to insist that Companies who are in breach remediate the environmental deficits they cause is unacceptable practice for any Appropriate Authority in this day and age.

The science is also clear with extensive published findings in relation to the catastrophic and unacceptable impact of open sea cage salmon farms. The very frequent and uncontrolled levels of sea lice emanating from these cages during the salmon smolt migrating months in Springtime impacts migrating salmon and sea trout post-smolts resulting in the reduction of returning adult numbers of close to 50% ! This at a time of dramatic reductions in returning wild Atlantic salmon numbers to our rivers and at a time when worldwide salmon population numbers have been recently classified as 'critical' and in the UK 'endangered' is surely UNACCEPTABLE.

As a concerned angler, I would like to see salmon and sea trout stocks survive for our children and grandchildren, this is a plea to you and your Department to 'Do the Right Thing' and reject this Licence T06/202 renewal from Silver Kings Limited / MOWI.

I would further request that, as Minister, you regulate more firmly this Industry in the interest of the Environment and the dramatic reduction in salmon stocks. There are many improvements required from many stakeholders ... but the most significant of all of them, in my view, is the regulation of salmon farming in open pen cages across the river estuaries on the Western seaboard ... and this is YOUR responsibility Minister and you have the Habitats Directive, also your responsibility to implement in full, to deliver the responsible outcomes. We, as concerned citizens, rely on you to act.

Yours Sincerely,



From: [redacted]
Sent: Tuesday, January 9, 2024 5:34 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref: T06/202

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Sent from my iPad

From:
Address:

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

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4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed _____

From: [redacted]
Sent: Wednesday, January 10, 2024 10:10 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Submission re mowi

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Dear sir
[redacted].For many of those years I worked with the local community organisations trying to improve the water quality particularly flowing into our bays and rivers.Finally after many years of agitation Waterville got a state of the art water treatment plant.Caherdaniel & Ballinskelligs are still not fit for modern purpose.This extension of the fish farm will be similar to a town of 50,000 population from an effluent viewpoint.(Particularly Ecoli).I cannot understand the mentality that would allow effluent to come into the same bays that we are trying to rid of ecoli.
Yours sincerely
[redacted]

Please note that my email has changed to [redacted]

**From:** [redacted]
**Sent:** Wednesday 10 January 2024 13:43
**To:** FinfishPC

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**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
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significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

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6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

8 — Anecdotally, operation/management of this fish farm in the past has not always been in accordance with its licence obligations

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

[redacted]_____ Sent from my iPhone

Recd. 10/01/2024

[redacted]

8th January, 2024

To:
Minister for Agriculture, Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty
Co Cork
P85 TX47

**Ref T06/202 - Deenish Island Aquaculture and Foreshore Licence for salmon farm**

Dear Minister,

I wish to register my objection to the above licence application and wish you to consider the following points:

1. The Deenish site is in close proximity to the once internationally famed salmon and sea trout fishery system at Waterville, Co. Kerry, up to comparatively recently a key tourist attraction to the area and a significant contributor to the local economy. Salmon farming commenced at the Deenish site in 1990. In 1991, and particularly 1992, problems arose in the Waterville fishery with a) higher levels of sea lice evident on returning sea trout, and b) large levels of prematurely returning sea trout smolts heavily infested with sea lice, mostly in a weakened or dying condition. This ultimately led to a collapse in sea trout stocks in the Waterville fishery. The Deenish salmon farm closed in 2004 and a gradual recovery in sea trout stocks became evident in the Waterville fishery in subsequent years. However, with MOWI purchasing the Deenish farm in in 2008, and salmon production resuming in 2010, the sea trout stocks at Waterville soon collapsed again. Today, the Waterville fishery is largely a ghost fishery, abandoned for the most part by visiting anglers, and with catch restrictions in place to protect the few surviving sea trout. The one factor in play here is the Deenish salmon farm. It is apparent to all truthful observers that this farm has created the collapse of the Waterville fishery. History has shown too that when the farm has not been in operation the Waterville sea trout stocks show a recovery. There is no reasonable basis to assume the granting of the licence now sought will reduce the impact the Deenish salmon farm has been having on the Waterville fishery. There is, however, every reason to believe the devastation will continue if the licence is granted.

2. The Natura Impact Statement (NIS) submitted in support of the licence application relies on very limited scientific data in regard to the harmful impact of sea lice emanating from salmon farms on wild salmonids. As such, I believe the NIS to be inadequate. Rather than relying on a narrow and flawed field of scientific information (such as Jackson et al), I believe the NIS needs to address the history of salmon farm production at Deenish and its direct impact on what has happened to the Waterville fishery. The NIS also needs to be examined against the far broader range of peer reviewed scientific studies carried out in several countries, including Ireland, which all clearly highlight the damage caused to wild salmonids

from sea lice emanating from salmon farms is very significant and seriously damaging. Ireland has earned an international reputation as a country of high ethical, scientific, and technological standards, often taking a lead where other countries have lagged, and it is now time for us to move to rely on the overwhelming body of best available scientific advice in regard to the impact sea lice emanating from salmon farms have on wild salmonids.

3. Climate change has resulted in increased water temperatures in the seas around Ireland, particularly evident in 2022 and 2023. This has led to increased problems for salmon farmers and includes algal blooms, accelerated levels of sea lice production, a surge in jellyfish numbers, leading to a general decline in the health of farmed fish. This in turn has led to increased mortality in farmed salmon, and with mortality levels on the Deenish salmon farm in recent years ranging from 25% to close on 40%, the question of fish welfare comes to the forefront. I believe sustained mortalities at these levels are not acceptable on a fish welfare basis, and given the gradually increasing water temperatures due to climate change I do not see a basis for believing these mortality rates can be reduced in the future.

4. Amoebic Gill Disease has been a problem on the Deenish farm, this and other diseases associated with the farm can be passed to wild fish. They are an unwarranted threat to the survival of our wild salmonids.

5. Our protected freshwater pearl mussels are dependent in their reproduction cycle on wild salmonids carrying juvenile mussels (glochidia) with them for distribution elsewhere in the river. The significant mortalities in our wild salmonids as a consequence of salmon farms are therefore posing an additional threat to our already endangered stocks of freshwater pearl mussels.

6. Salmon escaping from salmon farms have been proven to interbreed with our wild salmon, leading to a loss of genetic integrity and resulting in reduced survival rates in the offspring.

7. I am acutely aware of the excellent reputation our agricultural produce has earned internationally. Our produce is viewed as healthy, farmed to the highest standards, fully traceable, with strict rules on use of medication, and the highest standards of both animal welfare and husbandry. By contrast, the history of salmon farming at Deenish Island is one of disease, excessive mortality in farmed salmon stocks, explosions in sea lice numbers, all leading to devastation in the runs of wild salmonids in the region and the loss of an enormously important tourist angling business to the economy of Waterville.

   My belief, Minister, is that open-net-pen salmon farming, particularly exemplified by the poor history of the Deenish salmon farm over many years, does not match, or even come close, to the very high standards of Irish agriculture, standards which we all now accept as the norm. Furthermore, I believe that the poor record of open-net-pen salmon farming, at Deenish and elsewhere, represent, by association, a serious reputational threat to Irish agriculture.

8. The Wild Atlantic Way tourism campaign has been very successful and resonates deeply with our visitors. However, I wonder what the average tourist, gazing out from the Ring of Kerry at Deenish Island salmon farm, would tell his/her friends back home were they aware of the history of disease and devastation caused by this farm to the local environment, ecology

and the salmonids of Waterville and Kenmare Bay. What price do we set on the reputation of the Wild Atlantic Way?

In conclusion, I will summarise by saying open-net-pen salmon farming at Deenish Island has a poor history of fish welfare, has proven to be diseased ridden, environmentally and ecologically damaging. Science has shown it has had, continues to have, and we can anticipate will continue to have a devastating impact on local wild salmonids so long as it remains in operation. We must all move with the times. The salmon farming industry too must move with the times and switch to onshore closed containment systems. Minister, please decline this licence application.

Yours sincerely,

[redacted]

8/1/24

From:
Address [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

*Dear Minister,*
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – *Our seas are warming as a result of climate change and mortalities in salmon farms have been on* the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild *salmonids.*

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the *devastation of wild salmonids and the loss of most of the tourist angling business at Waterville.* Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



**From:** [redacted]
**Sent:** Saturday 13 January 2024 11:07
**To:** FinfishPC
**Subject:** Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry
**Attachments:** Waterville objection.docx

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Dear Minister.

Reference T06/202
Please find attached my objection to the above application.
[redacted]

Reference T06/202

Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry.

Dear Minister

I wish to object to the above licence application for the following reasons.

Seatrout stocks.

1- I fished the Ballynahinch fishery, Connemara, specifically lough Inagh through the early to mid 1980's. We were catching approximately 2000 sea trout per year. Enter the salmon farms the catch dropped to 200 in a short time followed by 2 the following year.
2- The salmon farm on Deenish Island was established in 1990's. this has been followed by a collapse in the returning seatrout number, just like Ballinahinch. However when for a few years in the 2000's when there was a halt to salmon farming in Deenish the stocks recovered only to collapse again when salmon farming began again. So it remains today a world class fishery now a desert.
3- Similar experiences have occurred around the world and where the salmon farming has stopped the fish have returned.

Financial

1 Angling brings massive financial benefits to the local communities. By in large the seatrout fisheries are in isolated costal communities such as Connemara and in this case Waterville, where employment opportunities are few. A visiting angler needs somewhere to stay, food and drink, transport, hire of a boat and local expertise all of which brings a large financial benefit to the local community. When fishing lough Inagh in the 1980's one had to book lodgings and a boat well in advance. Now the boats lie idle.

2 On the eastern seaboard of the USA there was a substantial commercial stripped bass fishery. It was worth less than 30 million dollars annually. However the fishery collapsed stopping the commercial fishery allowing only sport angling. In a few years the fish returned in numbers and now the angling fishing is worth a multiples of 30 million to the local community.

3 Salmon farming brings very little local employment, no tourist visits, no need for accommodation etc..

Environmental

1 Salmon farms create an explosion of sea lice parasites which kill seatrout smolts by virtue of their numbers.

2 Salmon farms destroy the sea around and below them. This is due to the salmon slurry. All sea life under and around and under the farm are destroyed. There is an excellent

documentary by a Mikael Frodin  called “Artifishal” which demonstrates the above clearly.

So please Minister do not give a licence to the above in Deenish Island. We in Ireland have/ had a number of world class fisheries. Are we to be knows as the destroyer or the savour of one of them in Waterville.

[redacted]

**From:** [redacted]
**Sent:** Sunday 14 January 2024 18:33
**To:** FinfishPC
**Subject:** Renewal of MOWI salmon farm licence
**Attachments:** Lough Currane.docx

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Attn: [redacted]
Hello [redacted]

I'm a long-time ambassador of Lough Currane, the finest salmon and sea trout fishery Lough in the country and I'm advocating a 'No Vote' for MOWI's application for renewal of its salmon farm license.

Kind regards,

[redacted]

**Lough Currane, Waterville, Co. Kerry**

**Ref: renewal of MOWI salmon farm licence**

In my sunset years, looking back over nearly 40 years of a pastime devoted to fishing the rivers and lakes on the West Coast of Ireland, Lough Currane, which I fished regularly with some on my best angling buddies, was one of the natural gems of creation set in magnificent, scenic countryside with its phenomenal salmon and sea trout stocks from the Atlantic. Game fish which were the darlings of anglers from at home and abroad setting the daily stage for the prospect of yet another record catch, and life-long cherished memories of every day on the Lough.

[redacted]

Tour operators and travel agents were essential promoters of travellers/holidaymakers into Shannon and the attractions of the West and special interest activity options played an important part in attracting sectoral interests. Theses activities included angling, and it was my job to let the angling tour operators experience first-hand the fishing on offer. Lough Currane was always on my preferred list of fishing waters to impress my clients and they were never disappointed after a day out on the lake, and an evening meal downtown Waterville to chat about their amazing experience.

Currane is always alive and well in my memories of great days, but I'm hearing reports in recent years of catches fading and the Lough losing its appeal.

What's going on about the renewal of MOWI's salmon farm, which will have even greater devastating effects on fish numbers accessing the Lough, and the local angling tourism economy.

[redacted]

**From:** [redacted]
**Sent:** Monday 15 January 2024 11:27
**To:** FinfishPC
**Subject:** Objection to Aquaculture Licence & amp; Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry.
**Attachments:** Club Objection page 1.pdf; Club Objection page 2.pdf

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Dear Minister,

Reference T06/202

Objection to Aquaculture Licence & amp; Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry.

Attached please find a scanned copy of a letter sent to you on behalf of the Lee Salmon Anglers Club (Cork).

For your information and necessary action, please.

Yours sincerely,

[redacted]
[redacted]
Lee Salmon Anglers Club

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division,
National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie
Reference T06/202
Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

January 2024

Dear Minister,

We, as an Angling club wish to object to the license application above for the following reasons: –

For decades we have been committed to Angling and conservation of fishery stocks by angling in a responsible "catch and release" manner. Many club members have fished the Waterville fisheries for decades.

In early 1990 or 1991 a number of club members attended a meeting in the Waterville Community Centre when the first mention of a new salmon farm was mooted locally. There was a full house in the local community centre. It rapidly became clear that the attendance was divided into a small number of people who believed that the salmon farm would provide a lot of employment and presumably wealth but there was an overwhelming number of anglers, accommodation owners, hoteliers, Gillies and others who were strongly opposed to the plan.

At the time there were probably 40 gillies available for visiting anglers and there were dozens of Bed & Breakfasts and other forms of accommodation available. It went without saying that the Angling "spend" in the area was substantial and very important.

Unfortunately during the course of the meeting voices were raised in favour of the fish farm and we can still recall the spokesman saying that if it did not take place, then many of the attendees would be living in Cricklewood and trying to earn a living there.

Unfortunately, history has now shown that the arrival of the fish farm devastated the sea trout fishing and regrettably the 40 Gillies available at the time have now been reduced to probably less than 10. There is a daily blog which has been run, privately apparently, for many years updating all and sundry on the fishing. It tells a tragic story. The gillies are gone, the sea trout are gone, the number of boats on the lake has diminished from 30 or 40 per day on an average day to 0 to 5 per day throughout nearly all of the season.

It seems that the gillies are the one  gone to Cricklewood together with many accommodation providers, and the fishing is useless.

We read through the paperwork used in support of the application. It does not seem to raise any concerns whatsoever about the sea lice. It does not raise any concerns about what is

happening at the cages. It does not address the unavoidable fact that large numbers of fish in cages attract huge numbers of sea lice. The sea lice spread onto any fish inside or outside the cages so that the fish are literally eaten alive (unless they are treated. The developers suggest that they treat their fish (in the cages) by putting them through a process. They do not have anyway of treating the fish outside the cages. The result is that the fish which congregate outside for a free feed or destroyed by the sea lice. It is only natural there's any Seatrout (which do not take the long ocean voyages of salmon) will go to wherever the find food most easily. There is seriously serious spillage of food and on one particular day recently when some of our members went for a spin near the cages one particular cage (or more accurately it's feed pipe) was malfunctioning and was constant constantly firing feed into the cage. This continued for hours. As a simple experiment we tried to cast for a few mackerel in the vicinity of the cages and caught mackerel full of the brown food pellets which were being sent into the cages and were clearly falling through the cages attracting mackerel and other species presumably to gather in unnatural numbers in a natural surroundings for easy food pickings. There is no doubt that this destroys all natural instincts of the affected fish both inside and outside the cages.

The operators of this fishfarm have proved they are complete flouting of their production limits ,that they are not controlled and certainly will not be controlled in the future.

The only hope for the previously world class Waterville fishery is for this application to be refused. It is commercial suicide to permit this application to succeed.

The greatest irony is that [redacted] who spoke at the meeting in the early 90s prior to the arrival of the first fish farm said that "if we are not wanted, we will not come". A few months later a local plebiscite was taken and 409 people voted for or against the fish farm. Nine voted in favour. 400 voted against. Presumably most of the 400 are now in Cricklewood and the employment level at the farm, as per the application, is in or about nine people.

This application must be refused in the hope that the fishery might be restored to its former glory and perhaps the tourists and the emigrants will return.

[redacted]

Lee Salmon Anglers Club

**From:** [redacted]
**Sent:** Monday, January 15, 2024 10:41 PM
**To:** Info <Info@agriculture.gov.ie>
**Subject:** Ref T06/202. Aquaculture Licence and Foreshore Licence application for a Salmon Farm aft Deenish Island, Co Kerry.

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister, The Salmon Farm at Deenish Island has caused untold damage to the nearby Wild Salmon and Sea Trout Fishery at Waterville. Thanks to SEA LICE, AMOEBIC GILL DISEASE ETC ETC. Relatives locally speak of the terrible damage to the Angling Tourist Business. I wish to object in the strongest terms possible to the granting of the above-mentioned licences.
Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 08:59
**To:** FinfishPC
**Subject:** Objection to renew salmon farm license at Deenish Island

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To The Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division

Lough Currane - The Jewel in the Sea Trout Crown?
It certainly was, but not anymore I'm afraid.
Sea Trout, unlike Salmon, are extremely resilient, and can and will recover their stocks if given their chance.
Tourism has been decimated in Waterville because of the decline in Sea Trout.
The salmon farm is the reason!
I object to the renewal of this license.

Sincerely,
[redacted]

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

On a personal note I fished and lived in Waterville for many years. Now the Sea Trout are almost gone – due mainly to Sea lice from fish farms.

Signed [redacted] 12th Jan '24.

From: [redacted]
Address:

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

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2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

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6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

On a personal note I sorely miss eating Salmon, I don't cook it anymore and encourage my friends and family not to buy it after watching these documentaries on farm fish. I don't want to get cancer. Sincerely Yours [redacted]

From:
Address [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

I fished many years in Waterville and surroundings. Rivers that are now almost fish less.

Signed [redacted] 14/1/24.

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 09:12
**To:** FinfishPC
**Subject:** Objection to MOWI Salmon Farm License at Deenish Island
**Attachments:** facebook_1705395366899_7152946608969545089.jpg; facebook_1705395379646_7152946662433804493.jpg; facebook_1705395386716_7152946692085365102.jpg

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Dear Minister,
I would appreciate you taking into consideration the grave concern Irish anglers have with regard to the renewal of MOWI's salmon farm and all fish farms along migratory routes of wild atlantic salmon. The environmental impact of salmon farming coincides with the massive decline in wild migratory fish stocks across the globe and there are thousands of studies to back this up. 2023 was the worst year for salmon fishing ever on this island. Local economies are dependent on this fantastic fish. It was estimated that every wild salmon caught on rod and line is worth over €4000 to the Irish economy. Wild Salmon are now endangered and our waters need protecting. These farms although bound by guidelines, are difficult to govern due to their location and tend to be massively overstocked with constant sea lice infestations which are detrimental to juvenile migrating salmon.

[redacted] in Delphi Fishery would be delighted to give you a witness account of the destruction of a world class Sea Trout fishery caused by the introduction of fish farms into Killary Harbour a few decades ago. I can arrange a call if necessary.

See images attached of salmon [redacted] diagnosed with Cardiomypathy Syndrome, Pasteurella skyensis, multifocal hepatic necrosis, salmonid Alphavirus, anorexia, lesions, haemorrhaging and deformed hearts.

I would strongly suggest you stand up for what is right.
Kind regards,
[redacted]

--

[redacted]

[redacted]

[redacted]

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F5 Lesion

From: [redacted]
Sent: Tuesday, January 16, 2024 9:42 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Salmon Farm Objection

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Dear sir or madam

I understand MOWI have applied to renew the salmon farm licence at Deenish Island. Allowing this application to proceed would be highly irresponsible. I am therefore registering a formal objection.

Salmon farming is a known cause of devastation to the local salmon and sea trout stocks in the rivers and lakes of Waterville. The ecological impact alone should be sufficient reason to reject the application. The impact on the local economy will also be devastating. Many hotels, B&Bs, shops, restaurants and angling guides depend strongly on the visiting anglers for their livelihood.

Regards
[redacted]

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 09:47
**To:** FinfishPC
**Subject:** Deenish island fish farm license

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Hi I'm writing to you to in a sense of urgency to not grant the fish farm license for Mowi at Deenish Island,the effect this farm is having on Salmon and Sea Trout stocks on Lough Currane and surrounding fisheries is Devastating.
The Atlantic Salmon has already been marked as an endangered species in the UK and if things keep going this way in Ireland it's not looking good for their future here either.
Please listen to the people who know their Loughs and Rivers and are noticing the steep decline.
[redacted]

From: [redacted]
Sent: Tuesday, January 16, 2024 10:23 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Salmon license Deenish Island.

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I would like to object to the license renewal by Mowi at Deenish Island.
If we do not do everything possible to protect our dwindling population of migratory fish then we will lose them forever. Atlantic salmon are fast becoming a " red-list" endangered species and salmon farming does not help.
This fishery around Waterville supports many businesses and livelihoods ,why put those at risk?
So, let's just protect this fragile environment please.
[redacted]
Sent from my iPhone

From: [redacted]
Sent: Tuesday, January 16, 2024 11:52 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Deenish island fish farm

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Dear sir / madam
I'm emailing to express my concern and objection to the proposed fish farm at Deenish island. This has the potential to destroy what s left of the wild salmon fishing in the Delphi area and all further along the west coast.
Please do not let this go ahead.
Kind regards
[redacted]

Sent from my iPhone

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 11:58
**To:** FinfishPC
**Subject:** Deenish Licence Renewal Application
**Attachments:** Deenish Salmo Farm Licence withdrawal (002).docx

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To whom it may concern.

Please accept the attached submission in relation to the Deenish Salmon Farm Licence renewal application Ref: T06/202.

Regards

[redacted]

**Minister For Agriculture Food and The Marine**

Aquaculture & Foreshore Management Division

National Seafood Centre

Clogheen

Clonakilty Date: 16/01/2024

Co. Cork

Dear Minister

Please accept this submission asking the minister not to renew the aquaculture licence T06/202 operated by Silver Kings Limited / MOWI at Deenish County Kerry.

Firstly, there is undisputable evidence that the Salmon Farm in Deenish and others farms operated by MOWI have been repeatedly overstocked and portrayed other questionable management practices in direct contravention of their licence conditions.

It is crucial that a president is not set which would allow Salmon Farming companies ignore licence granting conditions in the interest of animal cruelty, the detrimental effects on wild salmon numbers whose worldwide population numbers have recently been classified as 'critical', not to mention the destruction of our marine environment.

There is extensive evidence published e.g. ( Sheppard & Gargan 2017 ) that when lice from fish farms are at a 'high' level particularly during the Spring migration months , the impact on those migrating salmon and sea-trout post smolts can be catastrophic and result in a reduction in returning adult numbers by almost 50%.

The Marine Institute continue to point to a paper published by Jackson *et al* in order to refute the above findings. However, the Jackson papers findings have come into question by numerous high profile scientists both in Ireland and throughout the world.

In relation to the above Deenish Licence, the impact of this Salmon Farm has been seen to have decimated the world famous Lough Currane seatrout fishery in Waterville which is over 10 Klm from the Deenish site.

Based on all of the above, I am requesting as both an angler and concerned citizen of Ireland that you refuse to renew the licence at the Deenish site.

Yours sincerely

[redacted]

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 12:58
**To:** FinfishPC
**Subject:** Objection to MOWI Licence for farmed salmon at Deenish Island Lough Currane, Kerry

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Dear Recipient,

I strongly object to the above licence application. I am an angler and used to travel down to Waterville to fish Lough Currane regularly. I no longer do so as the fish farming has the lake ruined and much damage has been done to wild fish stocks. When I did go, I was staying in local hotels or B and Bs, eating out in restaurants and hiring local ghillies, like [redacted], a fourth generation ghillie, all of which contributes to the local economy.

I find it incredible that a state body wishes to promote private business that severely pollutes our environment for a small number of employment opportunities so the business owners can make profits at the nations and our shared environments expense.

Salmon farming is short sighted, Atlantic salmon that roam for thousands of miles are not meant to be confined in cages by the thousands to grow deformed, covered by sea lice with extremely high mortality and escape figures. The massive amounts of chemical needed to keep farmed salmon alive and to control disease due to overstocking and sea lice infestation is not a sustainable business model for food production. The flesh of these creatures is dyed to copy the color of the wild salmon, otherwise it would be a grey color. The awareness of the unsustainability of salmon farming in open cages is beginning to build and public awareness is growing. The fresh water extraction from other valuable sources that has occurred should not be tolerated as it again degrades the freshwater environment and affects local residents drinking water. These operations are severely damaging to wild salmon and sea trout stocks by predation of smolts by sea lice blooms. Wild wrasse are being plundered in an attempt to control lice and must be killed when they are not required as the risk of disease if released is too high. Our seas are being put under massive pressure by extraction of many species, some not restricted by quota to make fish meal to feed these creatures. It has been reported that the wild mackerel stock did not visit our local shores in any great numbers in previous years due to pressure by overfishing, not just foreign boats but our own taking sprat to make fishmeal. Our wild salmon genetics are being damaged by the escape of these fish and interbreeding with our most valuable wild stocks. Norwegian studies have shown over 70% of wild stock have had their genetics altered by farmed salmon. If this Government wish to continue this madness then please do so on land where the variables can be controlled and our environment will not be damaged, as severely.

The real green, sustainable, renewable resource which needs to be developed is our own wild stocks of salmon, sea trout and brown trout through promotion of both domestic and tourist angling that has shown to be worth a huge amount to the economy. This money would be spread out between many businesses in the hotel, restaurant and many support businesses that support the angling sector. It is sustainable and far more beneficial to our community. The main benefit is not only economic, but the

improvement of mental wellbeing of our people by spending time outdoors in a healthy activity has been scientifically proven to be hugely beneficial.

I feel it is my duty as an passionate angler and an informed person who is both interested and aware of our aquatic environment to make this submission. There will be no wild fish left if this route is pursued for profit for the few sponsored by the state with the excuse for employment and development.

Any person of average intelligence can examine the science to conclude that farmed salmon in open sea cages is not a sustainable activity and should certainly not be supported by our state bodies.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 13:00
**To:** FinfishPC
**Subject:** Deenish Island EIRE

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PLEASE CAN YOU STOP SALMON FARMING OFF THE COAST OF WATERVILLE. I HAVE FISHED THERE FOR 35 YEARS AND THE WILD SEATROUT AND SALMON STOCKS HAVE BEEN DECIMATED BY DEENISH ISLAND FARM AND OTHERS..THE WHOLE WILD SALMON/SEATROUT IS GOING THE WAY OF THE CONEMARRA AND SCOTTISH FISHERIES SITUATED NEAR INTENSIVE SALNON FARMS
YOURS
[redacted]

Sent from Outlook for Android

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 13:30
**To:** FinfishPC
**Subject:** Deenish Island Fish Farm - for attention of Minister McConalogue

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Dear Minister McConalogue,

I wish to object most strongly to the granting of a renewal of the licence to the fish farm at Deenish Island, Co. Kerry. I lodge this objection on the following:

1. The current science suggests there may be risk from viruses and sea lice from the farms, leading the Canadian Minister for Fisheries to close and begin to lift out open-net salmon farms, with Prime Minister Justin Trudeau tasking her to develop the plan to shift from open-net salmon farming by 2025. I ask are we more scientifically tuned in than the Canadians ?.
2. It is incongruous to have a said open-net farm so close to a SAC/SAP
3. A sign on the road close to the Scarriff Inn mentions the Best View in Ireland Here, but when one looks down to the water the salmon farm is in full view !
4. The total collapse of the fishing holiday industry in the Waterville area which at one time was world renowned.
5. The very high death rate of farmed salmon in the open-net cages. Is it time that the public are made aware of the full facts surrounding the production of this food source ?.
6. The need for many chemicals to be used in that area of the sea close to Ballinskelligs Bay, where sea trout spend their sea-lives, and through which the juvenile salmon attempt to travel.

I first began fishing [redacted] and have been a member of the local fisheries group for very many years, spending my holidays fishing. [redacted] Furthermore, I cannot entice my fishing colleagues to come to Waterville anymore which is a tragedy. Over the past 30-40 years so many of those same colleagues enjoyed fishing in Waterville and willingly spent their savings in the area.
We fully realise that there are many factors affecting the stocks, but two issues we can attempt to control area the water quality in the rivers and lakes in the Waterville area and to stop the open-net salmon farming.
Accordingly , I sincerely hope that the licence for the Deenish Salmon Farm be refused.

Yours Sincerely,

[redacted]

Sent from Mail for Windows

**From:** [redacted]
**Sent:** Tuesday 16 January 2024 22:59
**To:** FinfishPC
**Subject:** Deenish island

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Hi
I wish to strongly object to the application by MOWI to renew their license in Deenish island which will have a devastating effect on wild salmon and sea trout that are hanging on in that catchment area

This farm has been operating since 2019 despite a court order to close it.
I hope trust the correct decison  will be made soon
Best regards

[redacted]

**From:** [redacted]
**Sent:** Wednesday 17 January 2024 08:03
**To:** FinfishPC
**Subject:** Salmon farm licence

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Dear Minister,

I would like to voice my objection to the licence renewal application for a salmon farm at Deenish Island. I used to travel from [redacted] to stay in the area solely for fishing. Unfortunately the salmon and sea trout fishing in the area has collapsed as a result of the salmon farm. The guest house I used to stay in has since closed due to the drop in visiting anglers. There are a whole host of other businesses that have lost custom due to visiting anglers no longer traveling to the area.
Please refuse this licence renewal and work toward restoring the once great angling industry that this area used to have.

Thanks

[redacted]

**From:** [redacted]
**Sent:** Wednesday 17 January 2024 14:08
**To:** FinfishPC
**Subject:** Objection to proposed fish farm

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To Minister of the marine

I would like to make a formal objection to the renewal of the fish farm licence to Mowi in Deenish Bay Co Kerry.
This fish farm has caused untold damage to wild salmon and seatrout fisheries in this area. Lough Currane has almost lost its huge runs of seatrout since this fish farm commenced. The renewal of this license would be the finishing blow to Lough Currane fishery and any other fishery located in this area.

[redacted]

From: [redacted]
Address [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

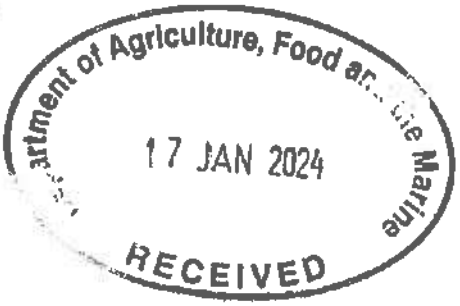
5 – *Our seas are warming as a result of climate change and mortalities in salmon farms have been on* the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild *salmonids.*

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the *devastation of wild salmonids and the loss of most of the tourist angling business at Waterville.* Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



[redacted]

16th January, 2024

Minister for Agriculture Food and The Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Co. Cork

Dear Minister,

Please accept this submission asking the Minister not to renew the aquaculture licence T06/202 operated by Silver Kings Limited/MOWI at Deenish Co Kerry.

There is undisputed evidence the the Salmon Farm in Deenish and other farms operated by MOWI have been repeatedly overstocked in direct contravention of their licence conditions.

It is important that a precedent is not set which would allow Salmon Farming companies to flout the rules and endanger the salmon population in the rivers on the West coast of Ireland. The West of Ireland, an area of natural beauty is visited by tourists from all over the world. It is essential for this that we do everything possible to maintain that beauty and wonderful wildlife.

Yours sincerely [redacted]

[redacted]



From: [redacted]
Address: [redacted]

16/1/24

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, [redacted]
National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

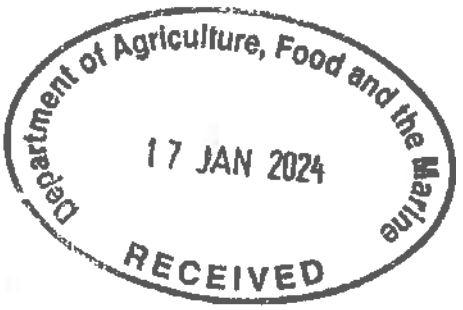
5 – *Our seas are warming as a result of climate change and mortalities in salmon farms have been on* the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild *salmonids.*

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the *devastation of wild salmonids and the loss of most of the tourist angling business at Waterville.* Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



Department of Agriculture, Food and the Marine
17 JAN 2024
RECEIVED

From:
Address:

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the *devastation of wild salmonids and the loss of most of the tourist angling business at Waterville.* Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

**From:** [redacted]
**Sent:** Wednesday 17 January 2024 15:42
**To:** FinfishPC
**Subject:** Objection to fish farm at Deenish Island

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Deenish fish farm has ravaged the salmon and seatrout stocks of Lough Currane (previously the greatest seatrout fishery in this country). Deenish continues to produce farmed salmon and pump out sealice despite a court order to halt in 2019, having exceeded its production quota by 121% three years earlier. How can this be???
From 2013 MOWI were producing 500,000 farmed salmon per cycle at the farm, vastly in excess of the allowed stocking levels. How can they be trusted to obey stocking targets in future?
I have visited the Waterville area to fish for the last 30 years. When I started there were over 20 boatmen taking anglers out on the lake, since the fish farm reopened in 2010 this number has now fallen to 2-3 working on a part-time basis.
It was common to see 20 boats of local and tourist anglers on the lake pre 2010 while now 2-3 boats is considered a busy lake. This leads to huge economic shortfalls to the area in accommodation, catering, and directly angling related jobs.
I have caught seatrout smolts returning prematurely after only months at sea in May 2016 on the Butler pool ( Waterville river) with over 50 juvenile sealice on their heads, dooming these fish. Both Lepeoptheirus salmonis and Caligus elongatus lice are present at Deenish. Fish farming is destroying the genetic viability of seatrout in the unique Waterville system by causing the lice proliferation. This system is of world importance for the species. The lice affect salmon too, making both species: prone to disease, have reduced ability to swim and feed with the knock on effect of poor breeding capability and they also have increased susceptibility to predation. The loss of these seatrouts' generic alleles (having evolved since the ice age) will never be replaced as has been seen after the introduction of fish farming in South Connemara and the west coast of Scotland. The sealice explosion due to fishfarming is in contravention of the EU habitats directive as acknowledged by the IFI.

The seatrout have no fallow period to travel along the Kerry coast. Both Deenish and Inishfarnard fish farms are open 12 months a year. There is no escape from the lice infestation. The utter collapse in sea trout and salmon stocks since 2011 is a result of the reopening of the farm by MOWI in 2010. This also harms the potential for pearl mussel production in the Waterville system due to its symbiotic relationship with salmonids.

I brought my children fishing on the Dawros river in Co Galway in 2021 and we caught one of the farmed salmon that had escaped from the existing fish farm in Ballinakill bay. This fish could have introduced disease or bred with the wild stock of fish in the river, dooming it's mutant offspring to failure. It wasn't alone. There were multiple captures of these fish in that river. These escapees can

spread Amoebic Gill Disease which is present at epidemic levels in Deenish and there is no reason to believe that they haven't escaped from this site ( as happened when 250,000 salmon escaped the fish farm in Bantry Bay in 2014).They can also endanger the genetic integrity of wild salmon they breed with.

I feel it is time for us to make a stand and protect our environment. All open cage salmon aquaculture should be halted and moved to closed containers or better again onshore. Global warming, the proliferation of jelly fish, algal blooms and the reduced survival rates of salmonids in warming seas all reinforce this argument. Mortality rates at this site are up to 46%, which is a huge inditement of the welfare that these fish are afforded and also an indication of the poor future prospects for open cage fish farms. A sustainable onshore/closed container farming model will create employment in an ethical and environmentally sound basis.

It’s the right thing to do to protect the tens of thousands of jobs that benefit from angling in the poorest parts of this country: a number that dwarfs the tiny number of jobs in the foreign multinational fish farm sector. It’s the right thing to do for our environment. And it’s the right thing to do for our children before the already endangered stocks of wild salmon and seatrout have been wiped out by fish farming.

Yours sincerely,

[redacted]

From: [redacted]
Sent: Wednesday, January 17, 2024 6:18 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to fish farming license

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Dear sir
I've spent 60 years of my life intermittently on the west coast. More when my parents moved there permanently.
I am a fisherman. Like many before me knew about the legendary fishing dating back from the early 19th century when books were written about the white trout. The fisheries were seen as some of the best in Europe.
This changed dramatically almost over a few years in Connemara. We saw it in the records and it was replicated in all the fisheries that had fish farms in the vicinity of the river estuary. Research was conducted by both sides in this argument and at the time because the Irish government had a stake in the venture, and it brought much needed employment to the area you could see why they were keen to ignore the evidence from the other side.
Evidence which was then revealed in many large Scottish and European fisheries. Same issue. There is something about this high concentration of force fed salmon and the clouds of sea lice that infects them that native migratory fish are in trouble. Seatrout don't migrate very far away and are in the middle of the toxic cloud. Salmon can swim past it but now that many feeding grounds are further away because of climate change and sea temperatures warming up they have longer to go before feeding.
Net result is a collapse in the population of both species.
The employment benefits were wiped off by the large decline in fishermen, holidays etc.
now that there is better road connection to the west coast,Wild Atlantic Way, and other tourism opportunities the need for fish farming is less pressing the need for attractive coastal areas is greater.
There can be no justification in continued licences for near coast salmon farming, they are sited there for pure economics and ignoring all environmental impact.

Please think very much before this short term benefit and consider the long term catastrophe with which you will be complicit.

[redacted]

**From:** [redacted]
**Sent:** Wednesday 17 January 2024 18:31
**To:** FinfishPC
**Subject:** Deenish Aquaculture Licence renewal application
**Attachments:** Deenish Aquaculture Licence renewal application.docx

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Minister For Agriculture Food and The Marine,

Please find my attached letter of objection to the renewal of the aquaculture licence T06/202 for Silver Kings Limited [MOWI Ireland] at Deenish Isaland, Co. Kerry, Ireland.

Yours sincerely,

[redacted]

**Minister For Agriculture Food and The Marine**

Aquaculture & Foreshore Management Division

National Seafood Centre

Clogheen

Clonakilty

Co. Cork

Date: 17/01/2024

Dear Sir / Madame,

Please accept this submission requesting the Minister not to renew the aquaculture licence T06/202 operated by Silver Kings Limited [MOWI] at Deenish County Kerry, Ireland.

There is unrefutably evidence to show the impact this and many other fish farms around the country are having on our natural and marine ecosystems. These licences should be granted only when there is a full environmental impact study, the results of which studies are taken onboard and acted upon. Previously there has been issue with the conditions of licenses not being adhered to.

The impact of these farm is catastrophic, I see it personally in Ballinakill Bay Co. Galway where unfortunately we have a 10 cage farm, I have seen the deterioration of marine life in the bay over that last 20 years, the seashore is barren, the salt water fish are all but gone. The salmon that pass by the cages on the migrations to and from the Dawros river are on a huge decline, we see it year on year, salmon & sea trout numbers fading, and the fish covered with lice.

I will not allow my child to swim in the bay on certain days, because you can see the slice of feces and food waste coming out of the cages, which is rife with parasites and disease, certainly not ideal for anyone to swim in. It is outrageous, who do they think they are, this is a designated SAC

I am sure the local people of west Kerry are similar appalled by the fish farming and resulting environmental disaster.

I ask you Minister, please do not renew the licence. Let them take a financial hit & move their operation to inland sites, away from our beautiful and extremely fragile estuarine & marine eco systems.

Yours sincerely,

**From:** [redacted]
**Sent:** Wednesday 17 January 2024 18:54
**To:** FinfishPC
**Subject:** T06/202 Objection to License

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Hi,

I would juat like to  personally file my objection to the application T06/202. As an anual visitor to lough currane for many years, the decline in sea trout since the installation of the salmon farm is having a major impact on the fishery. There is also a noted decline in the number of anglers visiting the lake which Im sure is directly as a result of the decline in sea trout numbers. I still wish to visit lough currane and travel from the west of Ireland for my weeks fishing but its becoming harder to justify the cost if things dont improve.

Best regards,

[redacted]

**From:** [redacted]
**Sent:** Wednesday 17 January 2024 23:10
**To:** FinfishPC
**Subject:** T06/202 Objection to License

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I would like to personally file my objection to the application T06/202.
As an annual visitor to Lough Currane for many years the decline in sea trout since the installation of the salmon farm is having a major impact on the fishery .
There is also a noted decline in the number of anglers visiting the lake which I am sure is directly as a result of the decline in sea trout numbers.
I still wish to visit Lough Currane and travel from the west of Ireland for my weeks fishing but it's becoming harder to justify the cost if things don't improve.
Best regards
[redacted]

**From:** [redacted]
**Sent:** Thursday 18 January 2024 10:53
**To:** FinfishPC
**Subject:** Deenish Island Salmon Farm licence - Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may concern,

I wish to object to Salmon Farm Licence being approved for Deenish Island. I believe this will further destroy the wild sea trout and salmon stocks in the region and nationally.

Salmon farming is one of the 1000 cuts leading to the death of the nations natural ecosystems, wildlife habitats and environment. The provision of this licence is clearly contrary to national & EU legislation on the protection of ecosystems, environment, water quality and habitats.

Regards,

[redacted]

**From:** [redacted]
**Sent:** Thursday 18 January 2024 11:01
**To:** FinfishPC
**Subject:** Deenish Island, application reference T06-202

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To whom it may concern,

I wanted to register my strongest objection to the renewal of the MOWI Salmon Licence at Deenish Island. I know others have gone to great detail in their objections, and I think we are now all too aware of the disastrous effects these farms have on the crucial natural habitat, so I won't go into any great depth. As both an avid fisherman and a postgraduate/masters student in Environmental Sustainability, I know that there is simply no good excuse for these licences to be renewed in this day and age. We know so much more than we used to. Please refuse the renewal of this licence to allow the regeneration of Ireland's formerly pristine habitats. They may yet recover.

Kind regards,

[redacted]

**From:** [redacted]
**Sent:** Thursday 18 January 2024 13:02
**To:** FinfishPC
**Subject:** FAO the Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division. Response to public consultation - Application to cultivate salmon at a site on the foreshore east of Deenish Island, between Ballinskelligs Bay and Ke...

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Dear Madam/Sir,

I am responding to the public consultation:

https://www.gov.ie/en/consultation/ebc99-t06202-public-consultation-on-an-aquaculture-licence-and-foreshore-licence-application-and-invitation-for-public-submissions-or-observations-on-appropriate-assessment/

Please note - I am a UK resident and wouldn't normally comment on any matters for the Republic of Ireland though do so here having been specifically sent the details of the application and consultation by the owner of a Bed & Breakfast business [redacted]

I query the establishment of a new salmon farm in the proposed location due to it's proximity to the mouth of the Waterville River and hence to Lough Currane. Experience in Ireland, Scotland and elsewhere is that such farms severely impact the stock of wild sea trout and salmon, plus create environmental damage.

Salmon farming already seems to have damaged sea trout stocks in Lough Currane and this may well finish them off. That there is a problem in Lough Currane is well established and has been recognised by the Inland Fisheries Ireland:

https://www.fisheriesireland.ie/news/press-releases/new-research-project-commences-in-kerry-to-investigate-the-decline-of-sea-0

The reason my friends and I visited Waterville was to fish for sea trout in one of the most famous and special loughs where it's possible to do so. However, I've not visited for some seasons due to badly reduced catches. This is a real shame as I would definitely return (as would my friends and other anglers) were sea trout stocks to regain a healthy state.

So, the impact from a new salmon farm on wild fish stocks and the environment generally will be accompanied by an enduring impact on the local economy, damaging the prospects for local B&B

owners, boatmen and guides on the lough and local shops/pubs (no visit was complete when I was in the area without visits to the Lobster Bar, Waterville).

Please note this as my input to the Consultation. If you need any more information please let me know.
Kind regards. [redacted]

**From:** [redacted]
**Sent:** Thursday 18 January 2024 15:56
**To:** FinfishPC
**Subject:** Deenish Island open salmon farm

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sirs,

I write with regard to the application pending for an increase to the above fish farm - whilst I understand that the current licence is suspended!!

I am totally against this fish farm even being in situ as it is currently as there is much substantial evidence against it's existence, and the existence of open salmon farming in general. These farms can be moved inland where there would be no problems.

When I first fished Lough Currane there were sea trout and salmon aplenty - this was in the late 1980's and then the fishing started a decline with the fish farm in place. I fished more often again in 2006 and 2007 and the fishing had returned [redacted]. However, since relocating [redacted] the fishing, which was in decline, is now in freefall and catching a seatrout is rare - as is catching a salmon. The seatrout of Currane were famous for their size due to their particular long lived strain. No large sea trout are being caught now - merely one last year!

This decline is due to the sea lice infection from the Deenish Island salmon farm and if it remains in place it will finish Lough Currane as a fishery for good. An increase in production would accelerate that termination. As I have said, there is ample evidence against the open farming concept for Salmon Europe wide. Farmed salmon is widely regarded as the most toxic food available - I would hope that you would not wish to be associated with expanding the availability of this.

This is not simply an selfish emotive plea from me because of the decline in fishing but the local area relies on the fishing in Lough Currane as does the tourist industry. The youth of today need some resources also to encourage their leisure and natural skills, to continue with the salmon farm would deny them this.

I hope that you will see that this is an odious operation (with 45.8% mortality rate) and that you will reject the application.

Kind regards,
Yours faithfully,
[redacted]

[redacted]

**From:** [redacted]
**Sent:** Friday 19 January 2024 09:44
**To:** FinfishPC
**Subject:** Deenish Island, salmon farm

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Hi

I was to make a submission/ objection to the proposed salmon farm at Deenish Island, Kerry by Mowi.

In the face of incontrovertible scientific evidence of the detrimental impacts of fish farming on protected Atlantic salmon and sea-trout, this fish farm and all others should not be permitted by this State.

It is an unsustainable practice at odds with the State's commitment to biodiversity and protection of the environment.

Along with the contamination caused by the farm itself, how does the applicant sustainably feed the farmed fish? By industrial herring fishing, mashed into meal in Killybegs, put on trucks and driven to Deenish?

The economic returns from salmon farming in this community versus the damage caused makes no sense.

Its embarrassing that a State Department, with access to leading scientists would consider an application like this in the first place.

Regards

[redacted]

**From:** [redacted]
**Sent:** Friday 19 January 2024 11:02
**To:** FinfishPC
**Subject:** Mowi fish farm application ref. 06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister for Agriculture,

I am writing to formally object to the MOWI application for the renewal of their salmon farm license at Deenish Island ref 06/202. The effect these farms have on wildlife of all kinds is devastating, not to mention the raw sewage that is deposited directly into the sea the equivalent of a town of circa 20,000 people.

MOWI has a track record of decimating wild salmon and seatrout populations in areas they have farms, and their animal welfare history is sub-par. The conditions these fish live in is horrible, with sea lice, open wounds and disease plentiful amongst the population. To allow this would be the nail in the coffin for a now endangered population of wild atlantic salmon and a tragedy for the surrounding environment.

Thank you,
[redacted]

From: [redacted]
Sent: Friday, January 19, 2024 11:17 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: T06/202

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As a long term organiser of angling holidays in the Waterville fishery I want to stress the significant impact the original farm here has had on wild fish stocks and the detrimental impact any further fish farm licence will have on the environment there. One weekend with my clients brings over 30,000 euro to the village of Waterville. Imagine that for 6 months or more of the year for multiple anglers and angling holiday providers.

I wholeheartedly object to this licence provision for this location. It's an absolute disgrace to think we have the application in the first place.

The loss of angling tourism in the area is insurmountable but can be reversed if the farm is removed.

The sea trout and salmon smolts will thrive again if we act now.

If we don't act now it will be irreparable and we will destroy this special species of fish for pure greed.

Please do the right thing here and decline this licence application.

Kind Regards

[redacted]

Sent from my iPhone

**From:** [redacted]
**Sent:** Friday 19 January 2024 11:18
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** Lough Currane - MOWI

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I am writing to you to object to the renewal of MOWI's salmon farm license on Deenish Island.

The renewal would be an incredibly ill judged and destructive decision - in a time when Ireland is fighting to be seen as "environmental" & "progressive", not only would the renewal be destructive to wild salmon (a recently endangered species) and sea trout population, but it is destructive to surrounding ecosystems. On top of this, the poor state of animal welfare that MOWI salmon farms face is horrific - no other animal would be allowed to suffer in such circumstances. Please research Don Staniford for firsthand evidence of this.

If wild salmon disappear in Ireland, the knock on effect to rural economies would be immensely destructive. It is a huge economical boost to rural towns in terms of jobs, supporting local businesses (pubs & hotels) and therefore further employment. Wild salmon are on the cusp of becoming extinct, predominantly due to salmon farms, and this doesn't just result in a threat environmentally but economically it will cause huge destruction to villages and towns on the west coast & south of Ireland.

I hope you undertake proper research when coming to this decision, here is a starting point: https://wildfish.org/project/salmon-farming/

**From:** [redacted]
**Sent:** Friday 19 January 2024 12:30
**To:** FinfishPC
**Subject:** Salmon Farm License at Deenish Island

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Dear Minister,

I am writing to express my deep concern regarding MOWI's application to renew the salmon farm license at Deenish Island. This development poses a significant threat to our salmon and sea trout populations, and I strongly object to its continuation.

In addition to the specific concerns about Deenish Island, I would like to highlight the broader issue of the damaging effects of salmon farming on our aquatic ecosystems. Salmon farming has been widely associated with environmental degradation, including water pollution, habitat destruction, and the spread of diseases among wild populations. This industry's negative impact on biodiversity and water quality cannot be overlooked.

I kindly request that you consider the broader implications of supporting salmon farming in our waters. I urge you to prioritise the health and sustainability of our marine ecosystem.

Kind regards,

[redacted]

From: [redacted]
Sent: Friday, January 19, 2024 1:48 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to renew the salmon farm license at Deenish Island.

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Dear Sir / Madame ,

I was extremely concerned to read MOWI have applied to renew the salmon farm license at Deenish Island.

As a life long fly fisherman this couldn't be worse news for our decimated salmon and sea trout populations .

There is substantial scientific and empirical evidence gathered over many years to support the correlation between Salmon farming , sea lice and depleted Sea Trout numbers in the areas where salmon farming it's taking place. The Sea trout numbers in particular in these areas are so low compared to the times prior to the salmon farming that we must fear for their continued survival in these waters .

I fully sympathize with operators of these farms and their need to earn a living . However I object to this continuing assault on our unique natural environment . There must be another way to ensure the safe and ecological cultivation for salmon while protecting our indigenous species . Until such a time as pressure is applied to find a better ecological solution , nothing will change. For this reason I object to this license being renewed .

Yours sincerely

[redacted]

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



From: [redacted]
Sent: Friday, January 19, 2024 5:32 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to MOWI Licence Renewal

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir or Madam,

I write to formally object to the licence renewal by MOWI at Deenish Island Co. Kerry.

Allowing this application to proceed would be highly damaging and hugely irresponsible.

Salmon Farming is a known cause of devastation to the local wild salmon and sea trout stocks in the rivers and lakes in Kerry.
The ecological impact alone should be enough to cause the application to be rejected. This farm has been proven to be the cause of the damage to migrating fish in the area.

The impact on businesses in Waterville and surrounding areas is already clear. The Hotels, B&Bs, Restaurants and shops in the area rely on visiting anglers from Ireland and significant numbers from overseas.

The area can recover as has been seen in other countries. This must stop before it is too late.

Please ackowlege my sincere objection.

Many thanks

[redacted]

From: [redacted]
Sent: Sunday, January 21, 2024 8:33 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection: MOWI salmon farm licence renewal- Deenish Island

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Dear Sir or Madam,

I would like to submit my objection to the licence renewal of the Deenish Island salmon farm operated by MOWI.

The reasons for my objection are as follows:

- The devastation of wild salmon and sea trout stocks.
- The heavy pollution of the surrounding ecosystem.
- A high risk of escape of the farmed fish into the natural environment, leading to the genetic pollution of wild fish populations.
- The unethical conditions in which the farmed fish are reared. If grazing cattle were subjected to the equivalent conditions on-land; the farm would rightfully be shut down immediately and the operator prosecuted.

The only moral decision is to reject this license renewal and drive the urgent change needed in the fish farming industry, towards closed containment farms; which have already been proven as viable alternative.

Kind regards,

[redacted]

**From:** [redacted]
**Sent:** Monday 22 January 2024 12:26
**To:** FinfishPC
**Subject:** Deenish Licence renewal application Ref T06/202

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Dear Minister,
I object to the Deenish Salmon Farm Licence application Ref T06/202 made by MOWI on environmental grounds, and in concern for the decline of the Wild Salmon and Seatrout returning to our rivers.

There have been many science papers written showing indisputable evidence of the effects that Salmon Farms have on our Wild Salmon and Seatrout.

Yours sincerely

[redacted]

**From:** [redacted]
**Sent:** Monday 22 January 2024 20:04
**To:** FinfishPC
**Subject:** salmon farm licence at Deenish Island

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To whom it concerns:

**We are horrified to learn about the application to renew the salmon farm licence at Deenish Island.** This needs to stop! We are completely against this. Offshore Salmon farming is an environmental disaster, and needs to be brought onshore at the very least!!

The Munster Blackwater is now a biodiversity dead zone. [redacted], has a wonderful Rod Fishery on the river, and like us, is appalled and dismayed at the enormous drop off in salmon numbers. His tourism numbers are falling away, fewer and fewer people are coming to the country to fish.

It is an ecological disaster, which is primarily caused by offshore salmon farming.
We need to wake up to this horrific environmental crime. There should be no more permits for offshore salmon farming off the coast of Ireland.
We care deeply about our wild atlantic salmon, and refuse to sit by and do nothing.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Monday 22 January 2024 20:24
**To:** FinfishPC

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I object to the granting of a licence for salmon farming at Deenish Island co. Kerry.
The salmon farm along with other one have devastated sea troutand salmon smolts in the areas they are sited. The sea trout fishing was worth s lot of money locally as many anglers came from all over Europe and Ireland to fish there. Alas no longer. One of the most stupid moves made for an area that has so much to offer.
Please don't issue a licence

Regards
[redacted]

**From:** [redacted]
**Sent:** Monday 22 January 2024 21:26
**To:** FinfishPC
**Subject:** Renewal of licence
**Attachments:** IMG_20240122_211052.jpg

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Dear Minister, We object to the Renewal of licence T06/202 , regards Macroom Trout Fly Anglers Association

# MACROOM TROUT FLY ANGLERS ASSOCIATION



Affiliated to:
M.R.T.A.C.
T.A.F.I.
I.T.F.F.A.

Hon. Secretary:
[redacted]

Dear Sir/Madam,

We at Macroom Trout Fly Anglers Association object to the renewal of the licence reference application T06/202 because of the impact, devastation to the stocks of our wild sea trout and salmon. These beautiful creatures are our most valuable assets, which are nearly extinct and we need to protect them.

Yours Sincerely

[redacted]

From: [redacted]
Sent: Tuesday, January 23, 2024 9:48 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: License

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Sent from my iPhone I strongly object to the granting of a licence to farm salmon in south Kerry , these people/ operators have abused the quota in the past and will do so again , regards [redacted]

From: [redacted]
Sent: Tuesday, January 23, 2024 10:45 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Application to cultivate salmon Kenmare bay

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I write to express my concern and objection to the application by Silver King seafoods ltd to cultivate Atlantic Salmon in Kenmare bay.
For many by ears I visited loch Currane and the near by river Sneam to fish for sea trout and Salmon. Since the sea cages were installed in the bay the number of migratory wild fish and in particular sea trout have been in serious decline.
I strongly believe that it is no coincidence. The demise of this once famous fishery is a consequence of aquaculture and the collateral damage cause by sea lice, pollution of the sea bed and chemical residues.
I now try to concentrate my fishing efforts on areas that are as far away from sea cages as possible and that still have healthy wild stock.
My simple observation is this. The money that I and many other touring fishermen would have spent in and around Waterville is now invested elsewhere to the detriment of the local and national tourist economy.
This can be put right. If the cages are removed there is a chance that the sea trout will return to the Loch. The presence of brown trout and their progeny that may choose to migrate to sea in safety should rejuvenate the fishery.
Please do the right thing and reject this application.

Sent from my iPad

(80)

0080

& Foreshore Management Division
23 JAN 2024
The Marine

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TK47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

There is no Salmon left in the lakes and Rivers - Mostly Due to Sea lice affecting the Salmon migration

[redacted]

Send x

(81)

Aquaculture & Foreshore Management Division
23 JAN 2024
Department of Agriculture, Food & The Marine

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division,
National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

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6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild *salmonids*.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the *devastation of wild salmonids and the loss of most of the tourist angling business at Waterville.* Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

15 JAN 2024

**From:** [redacted]
**Sent:** Tuesday 23 January 2024 15:31
**To:** FinfishPC
**Subject:** [Scan] 2024-01-23 15:29
**Attachments:** 2024-01-23 15-29.pdf

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Sent with Genius Scan for iOS.
https://dl.tglapp.com/genius-scan

Sent from my iPhone

FINFISH PC @ agriculture .GOV.IE



From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
*I wish to object to the above licence application for the following reasons:*

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

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**The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.**

Signed [redacted]

**From:** [redacted]
**Sent:** Tuesday 23 January 2024 17:51
**To:** FinfishPC
**Subject:** Reference T06/202 - Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry
**Attachments:** Salmon Farm Deenish - Letter of objection.pdf; Extract from Aquaculture Renewal Application T06-202.docx

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**Dear Sir / Madam**

I refer to the above application.
I enclose a letter of objection which is being sent to you by a number of my angling colleagues.

**I support the views expressed in the letter and wish to add my voice to the objections.**

This letter was drafted by a colleague who has far more technical knowledge than I of the impact of farmed salmon enterprises on the wild salmon population in the rivers and lakes of Ireland.
I have no doubt that there are "experts" on both sides of the argument who can refer to a whole range of scientific studies to back up their conclusions as to the extent to which damage to the wild salmon population is being done by farmed salmon enterprises.
The huge volume of technical data presented by the Applicant with this application would suggest the impact is of little significance.
I am sure equal volumes of technical data could be presented to show the opposite is the case.
However, whatever the merits of both sides to this argument, it has to be acknowledged that our wild salmon stocks have decreased alarmingly in the past number of decades and particularly since circa 2009.
Doubtless there are many factors contributing to this decline:

- Global environmental factors e.g. increasing water temperatures;
- Pollution of rivers and lakes;
- The impact of overfishing during the past century e.g. drift netting etc;

It would appear to me that salmon farming, particularly in the way it is carried out in open coastal containers (i.e. nets), has to be included as one of the high risk factors.
The logical conclusion therefore, if we are to adopt belated efforts to reverse the decline in out wild salmon stocks is, in my opinion, to adopt the so-called **"Precautionary Principle".**
This should definitely mean that we should not give any licences for new salmon farms in sensitive coastal areas and we should promote the adoption of alternative methods such as inland farming in fixed structures i.e. solid walled tanks.

I also note that it is intended to increase the annual production tonnage substantially and also to expand the boundaries of the licenced area (See attached extract from the application).

**I object strongly to this proposal.**

Yours faithfully

[redacted]

From:
Address:

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed _____

**Aquaculture Renewal Application T06/202**

**Extract from EIS Non-technical Summary**

The existing licence has an annual harvest restriction of 500 tonnes and an allowable input of 400,000 fish. A temporary amendment to the licence was granted in 2011 under special conditions and up held by ALAB in 2012 to change the licence specification to input 800,000 smolts every second or every other year i.e. the equivalent number (twice) of smolts as the yearly licence, but on a biannual basis and to replace the annual harvest tonnage to a maximum standing biomass as is appropriate to the smolt input number.

For the aquaculture licence renewal application, the applicant requests that the operating conditions of the licence change to allow a maximum allowable biomass (MAB) of 2,200 tonnes.

The licence renewal application also requests that the boundaries of the licenced area be amended. The existing site is shown in red in the map below. The applicant requests that the boundaries of the licensed area be amended to those shown in blue (see map below).

**From:** [redacted]
**Sent:** Wednesday 24 January 2024 10:22
**To:** FinfishPC
**Subject:** Objection to the Renewal of Salmon Farm License at Deenish Island REF T06/202

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Dear planning office representative,

I am writing to you today to express my grave concerns and to formally object to the proposed renewal of the salmon farm license at Deenish Island, County Kerry. This objection is rooted in the significant and detrimental impact that this salmon farm has had, and continues to have, on the once world-renowned Waterville fishery.

**Historical and Cultural Significance of Waterville Fishery**

Waterville has historically been a beacon for angling enthusiasts, drawn by its abundant salmon and sea trout populations. This fishery has not only been a recreational haven but also a vital contributor to the local economy and a custodian of our unique ecological heritage.

**The Devastating Impact of Sea Lice Infestation**

The core of the issue at hand is the sea lice infestation, which has been scientifically linked to salmon farms. Studies, such as the one conducted by Ford and Myers (2008), have demonstrated how salmon farming can drastically increase sea lice larvae concentrations, leading to infestations in wild juvenile salmon and sea trout. This phenomenon is not just theoretical but has had real, observable impacts on the Waterville fishery.

**Direct Correlation with Decline in Waterville Fishery**

The proximity of the Deenish Island salmon farm to Waterville has had a direct and calamitous impact on our local fish populations. We have witnessed a stark decline in salmon and sea trout numbers, corroborated by local anglers, fisheries biologists, and conservationists. This decline is not just a loss of a recreational activity but an alarming signal of an ecosystem in distress.

**Learning from International Actions**

It is crucial to acknowledge the global context in which we are making this decision. The U.S. state of Washington's ban on all open pen salmon farms, due to their adverse effects on native species, serves as a precedent. This decision underscores the recognized need to protect wild fish populations from the impacts of salmon farming.

**Advocating for Sustainable Alternatives**

I urge the planning authorities to consider sustainable alternatives, such as land-based closed containment systems. These systems present a viable solution that minimizes the risk of sea lice infestation and ensures the health of wild fish populations.

**Conclusion**

In conclusion, I implore you to reconsider the renewal of the salmon farm license at Deenish Island. Our decision today will have lasting effects on the ecological and economic fabric of Waterville and its surrounding areas. We have a responsibility to protect and preserve our natural resources for future generations.

Thank you for considering this objection. I look forward to your response and am available for further discussion on this critical issue.

Sincerely,

[redacted]
Very concerned local angler & Environmental Conscious Citizen

**From:** [redacted]
**Sent:** Wednesday 24 January 2024 10:55
**To:** FinfishPC
**Subject:** Re Marine Finfish Application T06-202- objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I would like to strenuously object to this licence application by Mowi for Deenish Island Salmon Farm based on the following grounds:

1) It is scientifically proven that salmon farming devastates wild seatrout and migrating salmon smolt stocks.
2) Lough Currane is one of the last great Seatrout and Salmon fisheries in Ireland and as such needs to be protected, Salmon farming has already destroyed Seatrout fishing in Connemara.
3) The Deenish Farm is farm is already impacting the Currane fishery -this needs to be halted
4) Lough Currane and its catchment supports angling tourism particularly at Waterville this is at risk by granting this licence.
5) Mowi has breached the terms of its existing licence and as such should not be granted.
6) Mowi contributes little to the local economy uses and pollutes our waters for its own corporate profit.
7) Salmon Farming is a wholly unsustainable industry and has no business operating in Irish waters.
8) There is little welfare consideration for the salmon being farmed with high mortality rates and diseased fish- these diseases can transfer to the wild salmon and seatrout populations.
9) The Irish Government has a duty of care to protect our wild seatrout and salmon stocks, and as such should not grant this licence.

Thank you

[redacted]

**From:** [redacted]
**Sent:** Wednesday 24 January 2024 12:45
**To:** FinfishPC
**Subject:** Objection to Deenish Island Fish Farm Ref T06/202

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Dear Minister

I would like to make a submission of objection to the Silver King Seafoods Ltd, Mowi Ireland, Kindrum, Fanad, Letterkenny, Co Donegal at East of Deenish Island, Ballinskelligs Bay and Kenmare Bay Co Kerry.

Having worked in Fisheries for over 20 years I have seen a decline of salmon at an alarming rate. I am sure there are many factors for their decline but every probable cause must be addressed.
Fish farms without any doubt are a major contributor to the decline of wild atlantic salmon.
Parasites and disease from salmon farms have caused untold damage to our wild atlantic salmon stocks.
Escapees have run river systems with wild atlantic salmon having no reproducing expectations.
The diseases carried by these fish would weaken the native salmon and interfere with the migratory skills and ability to reproduce.
I am sure you are aware of the financial positives our wild atlantic salmon bring to our economy. Anglers from all over the world come to fish our river systems. Hotels, B&B's, restaurants, tackle shops, fishing clubs and of course our youth anglers will suffer with further setbacks to our wild atlantic salmon.
Our native salmon have the right to migrate to their feeding grounds and return to their spawning grounds without any man-made obstructions or obstacles to hinder them.
Climate change, water currents, water temperatures etc are already causing concern to our wild atlantic salmon,
adding to their already difficult journey would be detrimental to their existence.

I would like to make a submission of objection to the proposed fish farm in Deenish Island, Ballinskelligs Bay and Kenmare Bay for the above-mentioned reasons.

Yours

[redacted]

Sent from Outlook for Android

**From:** [redacted]
**Sent:** Wednesday 24 January 2024 20:07
**To:** FinfishPC
**Subject:** Deenish Island MOWI renewal proposal

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Dear Sir/Madam,

The current government and all parties involved in the decision to renew the MOWI licence for the Deenish salmon farm have totally lost the plot if they decide to renew it. The survival of Salmo salar and Salmo trutta trutta in the north west Atlantic is on a knife edge. Two iconic species, that have in some considerable part shaped irelands history are being disregarded in the name of money and greed. It is sad to think that we are so blind to the ecological disaster that we are facilitating on our doorstep, only to line the pockets of a handful of inconsiderate Norwegians. The idea that salmon farms create jobs is a myth, they are becoming nearly totally automated and require minimal labour to run. However, the continued decline of our own, native salmo salar and salmo trutta trutta, would in turn be devastating not only ecologically but also economically, as for decades, long before salmon farms were setup along our coastline these wild species have generated more jobs and supported more livelihoods than salmon farming ever will. I object wholeheartedly to the renewal of this licence, consider what you want to leave the generations to come!

Regards

[redacted]

**From:** [redacted]
**Sent:** Wednesday 24 January 2024 20:48
**To:** FinfishPC
**Subject:** Salmon farm at Deenish Island

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Hi

I am writing to inform you that renewing the salmon license at Deenish island will continue to impact the declining salmon and sea trout stocks. By renewing this licence, you are effectively contributing to the demise of the Irish salmon. The salmon is listed as an endangered species and it's a known fact that these farms are a contributor ( there are other factors ofcourse such as climate change, pollution and predators). I urge you to go out and physically look at these farms and observe the cruelty that these lice infested fish endure.

Our grandfather's fished these great waters before we were here. The stories of great fish coming into our rivers and loughs is definitely something of the past. Let's make sure our grand kids have something to fish for. The clock is well and truly ticking. We have to make the call regardless of financial gain.

When they're gone.....they're gone

Regards

[redacted]

89

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

Aquaculture & Foreshore Management Division
25 JAN 2024
Department of Agriculture, Food & The Marine

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

If we are serious about helping to restore biodiversity, then MOWI's application must be declined.

[illegible]

**From:** [redacted]
**Sent:** Wednesday 24 January 2024 22:12
**To:** FinfishPC
**Subject:** xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

**Categories:** Filed to eDocs

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Hi , I strongly recommend u do not
Grant a licence for the mowi fish farm , it does not make sense
For all the reason that you have many times being made aware off
Thank you
[redacted]

Sent from Outlook for Android

**From:** [redacted]
**Sent:** Thursday 25 January 2024 12:49
**To:** FinfishPC
**Subject:** xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

**Categories:** Filed to eDocs

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I want to object to salmon farm licence at Dennish Island [redacted]

**From:** [redacted]
**Sent:** Thursday 25 January 2024 18:03
**To:** FinfishPC
**Subject:** xxxxxxxxxxxxxxxxxxxxxxx

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I want to object  to mowi renewing farm salmon farm licence at deenish island our salmon stocks and seatrout are almost gone

**From:** [redacted]
**Sent:** Friday 26 January 2024 18:43
**To:** FinfishPC
**Subject:** Submission in relation to Application Ref No: T06/202
**Attachments:** Submission in relation to Application Ref No.T06202 .docx

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Dear Minister for Agriculture,

Please find attached my submission in relation to Application Ref No: T06/202 whereby Silver King Seafoods Limited, t/a Mowi Ireland, has applied to the Minister for Agriculture, Food and the Marine under Section 10 of the Fisheries (Amendment) Act 1997 for an Aquaculture Licence to cultivate salmon at a site east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co Kerry.

Yours sincerely,

[redacted]

Minister for Agriculture
Food and the Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre,
Clogheen,
Clonakilty,
Co. Cork,
P85 TX47

25th January 2024.

**Reference T06/202**
Applicant Name : Silver King Seafoods Ltd.
Applicant Address: Mowi Ireland, Kindrum, Fanad, Letterkenny, Co. Donegal.

Dear Minister for Agriculture,

I wish to submit a submission in relation to Application Ref No: T06/202 whereby Silver King Seafoods Limited, t/a Mowi Ireland, has applied to the Minister for Agriculture, Food and the Marine under Section 10 of the Fisheries (Amendment) Act 1997 for an Aquaculture Licence to cultivate salmon at a site east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co Kerry.

In September 2015 Inland Fisheries Ireland issued a warning based on a comprehensive review of over 300 scientific publications on the effects sea lice can have on wild sea trout stocks. This press statement can be viewed at: https://www.fisheriesireland.ie/news/press-releases/salmon-farms-can-have-a-significant-impact-on-wild-salmon-and-sea-trout-stocks#:~:text=The%20study%20also%20examined%20the,spawning%20in%20salmon%20farming%20areas

IFI referenced a definitive scientific paper which was published in the prestigious journal *Aquaculture Environment Interactions* on the effects of sea lice on sea trout stocks. The scientific paper outlines how a team of top international scientists from Ireland, Scotland & Norway reviewed all available published studies on the effects of sea lice and have now concluded that sea lice have negatively impacted wild sea trout stocks in salmon farming areas in Ireland, Scotland and Norway.

The paper entitled “Effects of salmon lice Lepeophtheirus salmonis on wild sea trout Salmo trutta—a literature review” can be viewed at: https://research-repository.st-andrews.ac.uk/bitstream/handle/10023/7295/Thorstad_et_al_2015_AEI.pdf?sequence=1&isAllowed=y

The scientific paper concludes that salmon farming increases the abundance of sea lice in the marine habitat and there is extensive published evidence that sea lice in intensively farmed areas have negatively impacted wild sea trout populations. The effects of sea lice on sea trout include increased marine mortality, changes in migratory behaviour, reduction of marine growth of individual fish, and reduced population sizes.

The study also examined the potential effect of sea lice on salmon and concluded that sea lice have a potential significant and detrimental effect on marine survival of Atlantic salmon with potentially 12-44% fewer salmon spawning in salmon farming areas.

The Board of Inland Fisheries Ireland highlighted the serious responsibilities on regulators, commenting that: "*This new scientific review paper confirms the need for very tight regulation of sea lice levels on salmon farms and raises legitimate concerns with regard to the potential impact of new large scale salmon farms proposed along Irelands west coast on salmon and sea trout stocks.* ***Regulators will now need to consider the results of this comprehensive review when making decisions on the sustainability and approval of future marine salmon aquaculture licences and the regulation of sea lice at existing sites so as to ensure no negative impact on salmon and sea trout stocks.***"

The press statement concludes that IFI have also raised concerns regarding the location of salmon farms in the estuaries of salmon and sea trout rivers. Within Silver King Seafoods Ltd Environmental Impact Assessment Report there are 13 rivers listed that flow into the Ballinskelligs Bay and into the north-western section of Kenmare Bay.

The facility's licence was removed by your Department in 2019 for harvesting 1,100 tonnes of salmon at the site, instead of the permitted 500 tonnes.

The Currane system is one of Ireland's premier sea trout fisheries and is listed in the Environmental Impact Assessment report. I have travelled from Cork to fish for seatrout in Lough Currane since the 1990's and have witnessed the drastic decline in seatrout, in particular specimen sea trout for which Lough Currane is world famous for. Anglers travel from all over the world for this angling experience, in turn providing a tourism industry which provides employment for ghillies, hotels, guesthouses, B&B's, pubs & restaurants throughout the open fishing season of January to October.

**The recommendations of the state body should not be ignored for this licence application.** To save the sea trout, the amenity and the associated tourism industry dependant upon it the application should be denied.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Friday 26 January 2024 19:06
**To:** FinfishPC
**Subject:** Objection to Deenish Island Fish Farm

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Hi
I would like to object to the licensing of the Dennish Island Fish Farm in Kerry. My reasons are below:

1 The amount of sea lice on the salmon and sea trout is significantly more since the fish farm was introduced.

2 The salmon and sea trout stocks are lower and in reason because of the fish farm. All anglers are expected to catch and release their catch to save the fish however we allow a fish farm that destroys the habitat of the fish and introduce food and chemicals to the pristine waters around the island.

Thank you.

[redacted]

**From:** [redacted]
**Sent:** Friday 26 January 2024 21:47
**To:** FinfishPC
**Subject:** xxxxxxxxxxxxxxxxxxxxxxx

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I strongly disagree with the renewing of the salmon farming license for Mowi on deenish island!

**From:** [redacted]
**Sent:** Saturday 27 January 2024 12:21
**To:** FinfishPC
**Subject:** Kerry Salmon Farm

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may concern,

I am writing to address my concerns and opposition relating to the application by the Norwegian fisheries company Mowi, for renewal of the licence for the Salmon Farming Facility located at Deenish Island, Waterville, Co. Kerry.

In my opinion the Sea Trout and Wild Salmon fishing in the surrounding areas, specifically Waterville Lake, the Inny River, the Cummeragh River, have suffered as a result of the chemical treatment on an overwhelming scale by the farm in order to treat and produce the qty. of farmed salmon being demanded which in turn has caused the Sea Lice population to explode.

This has had a detrimental effect on wild fish stocks and has resulted in a very low return rate of Sea Trout and Wild Salmon in the surrounding areas.

It would be shameful to approve the application of Licence Renewal to the Mowi Company, as to do so will decimate what remains of the fishing in the area.

Best Regards,
[redacted]

**From:** [redacted]
**Sent:** Sunday 28 January 2024 14:38
**To:** FinfishPC
**Subject:** T06/202 - Deenish Island Fish Farm License

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I wish to register my strong objection to the granting of a Fish Farming License.

The open cage fish farming system is banned in most countries and is the source of much pollution.

The impact of the intense fish farming is high mortality rates, creating breeding ground for disease and parasites which are transmitted to wild fish stocks.

Since the granting of fish farming in open cages, the wild sea trout and salmon population has declined markedly. The dramatic increase in sea lice infestation has led to the decimation of salmon smolts going to sea past these cages.

Salmon farming in open cages will lead to the end of the wild migratory salmonid fish populations in Ireland.

Fish farming provides employment for a handful of people whereas recreational fishing has far more direct and indirect employment. MOWI also has a poor record in a number of countries in preventing escapes from the open pens leading to the denigration of the genetic makeup of the wild salmon populations.

It is insane to grant a Norwegian Company (MOWI as beneficial owner) a license to destroy the recreational fisheries of Ireland.

Regards,

[redacted]

[redacted]

Email: [redacted]

**From:** [redacted]
**Sent:** Sunday 28 January 2024 20:36
**To:** FinfishPC
**Subject:** Opposition of the Salmon Farm off Deenish Island, Skellig Bay, Co. Kerry

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister McConalogue,

I write to you today to oppose the renewal of license to operate, and/or any expansion to the Salmon Farm at Deenish Island, Skellig Bay, County Kerry.
With the greatest respect Sir, please decline this application and close down this Salmon Farm. By doing so, you will be known as the minister who returned a pristine corner of our beautiful coast back to its
natural state. And very likely saving a unique species of Trout found nowhere else in the world for the future
generations of our nation.
I live in [redacted] with my family. My son and I have in the past enjoyed fishing in the Waterville Lake fisheries. But with the collapse of the Sea Trout population and the infestation of sea lice on
fresh fish returning to the fresh water system, we are hesitant to travel to Waterville. That means the small but
positive financial impact we have in the town of Waterville each time we visit will cease. I'm confident that is
repeated be many other would-be visitors. More importantly, a commercial enterprise has, and is, negating a
unique natural resource of ordinary Irish Citizens.
Our disappointment about a natural resource that is now largely unavailable to us, and the people of Ireland, is compounded by what seems to be an easy remedy by your department; decline the application, and
permanently close-down this salmon farm. Promoting, supporting and advancing our very important "agriculture sector", cannot ever include sacrificing a unique Irish species of animal or fish. What land base
farm on this island would ever be allowed to operate at such a high cost to our country and its citizens.
I am not a scientist, or a person with extensive knowledge of these matters, but I do VOTE.
Respectfully.

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Monday 29 January 2024 11:04
**To:** FinfishPC
**Subject:** T06/ 202 xxxxxxxxxxxxxxxxxxx

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I refer to the above application for an aquaculture licence and foreshore licence application and wish to make the following observations:
I do not consider Mowi to be a suitable entity given that the previous licence for this site was rescinded because of overstocking by 121%. I note that this company was recently found by the E.U. to be in breach of anti-trust rules and accused of price fixing . Mowi has also been found to have been overstocking at its hatchery in Donegal contravening their licence there .I would like to see a criminal investigation into how high up the chain of command that authorised these activities .

I find the operation of holding salmon in cages for 18 months , subject to stress, diseases causing harm and high mortalities, escapees causing genetic interference with wild stocks, polluting of our sea waters at no cost to the polluters , transferring diseases to wild stock of various types of fish, permitting small fish to enter their facilities and be eaten by their fish stocks, the use of wild fish ( wrasse and lumpfish) taken from various bays without any / proper assessment of impacts, the uncontrolled taking of fodder fish like sprat from various locations around our coasts to provide fish meal for the imprisoned salmon and the use of high levels of pesticides is unacceptable and immoral.

Given that Ireland does not permit fur farming and that many people find the keeping of chickens/ pigs/ cattle in intensive production units to be abhorrent , I would ask that you end salmon in cages and refuse these licence applications.

[redacted]

**From:** [redacted]
**Sent:** Monday 29 January 2024 11:16
**To:** FinfishPC
**Subject:** Salmon farm objection

**Categories:** Filed to eDocs

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To whom it may concern,
I wish to object, in the strongest possible terms, to the proposed development of a salmon farm at Deenish Island, Co. Kerry. The site is close to Lough Currane - a hugely important wild salmon sea trout fishery.
MOWI is a company that has left a trail of destruction in many parts of the world including Ireland. Their salmon farms have had devastating impacts on wild salmon and sea trout populations.
Our ever diminishing natural resources must be protected from further damage.
The proposal must not be allowed to go ahead.
Best regards,

[redacted]

**From:** [redacted]
**Sent:** Monday 29 January 2024 11:34
**To:** FinfishPC
**Subject:** Ref T06-202 Application for Aquaculture east of Deenish Island, Co. Kerry.

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,

I wish to state my objection to the application for an aquaculture licence by Silver King Seafoods Ltd east of Deenish Island, Co. Kerry.

[redacted] I understand that the current fishfarm employs a number of local residents and is an important source of income for them and their families, so I do not submit this application flippantly. There are very few employment opportunities in the locality, but there is also an opportunity for the government to invest in helping the community to develop pathways for a just transition away from unsustainable aquaculture into more sustainable industries, which could include certain other forms of aquaculture, marine conservation, environmental regeneration, and less damaging types of fishing.

I object to the application on the following grounds:

1. Although the report by Aquafact states that there will be no negative impact on the surrounding environment, this can not possibly be the case. Open cage salmon farming has been proven by scientific studies to have numerous environmental impacts. From personal experience, I have viewed the fishfarm from a high point on Scariff Island in the summer months and a plume of excreted material is clearly visible emanating from the open cages. Feed and excrement cannot possibly be contained within the open nets, as highlighted by this report:
   [redacted] Scientific studies have shown that salmon farming negatively affects population fitness in wild local populations (https://www.nature.com/articles/hdy2010165);
2. There is a clear move from the EU to define and promote a move to more sustainable aquaculture. *A Communication from the Commission to the European Parliament on a new approach for a sustainable blue economy in the EU* in 2021 provides guidelines for a more sustainable and competitive EU aquaculture for 2021 to 2030. These guidelines advance the importance of environmental quality in aquaculture production by citing the need to ensure “the mitigation of the impact that aquaculture activities may have on the environment (be it in terms of carbon footprint, effluents, waste or other impacts on marine and freshwater ecosystems), and that aquaculture activities do not significantly harm ecosystems or

biodiversity" (ibid, 9-10). Environmental performance should be measured by states as; "(i) ensuring that environmental legislation is applied and its objectives are met; (ii) further mitigating the impact of aquaculture; and (iii) promoting aquaculture with lower environmental impact and aquaculture that provides ecosystem services". The aquaculture facility at Deenish Island does not provide ecosystem services, and is an old-fashioned method of aquaculture that does little to mitigate its environmental impact (even since implementing organic practices). I found this article to be quite balanced: https://www.farmersjournal.ie/life/features/salmon-of-knowledge-are-fish-farms-to-blame-for-lower-wild-salmon-numbers-765479

3. Salmon farming may seem to be environmentally friendly as it could be seen to be reducing the pressure on wild fish stocks. However, salmon feed must of course be fished for (https://feedbackglobal.org/what-does-a-farmed-salmon-eat-lots-of-nutritious-wild-fish/). This not only has the potential to damage wild fish stocks, these fishing practices may also be socially damaging and unsustainable in themselves. Does your department take this supply chain into account when considering salmon farming?
4. The region in which the salmon pens sit is, as the EIA states, protected for many different ecological reasons including being an SPA for seabirds, an SAC for marine mammals, and a highly scenic area of the Irish coastline. Can the presence of an outdated method of aquaculture, run by a famously unscrupulous organisation, which has already been proven to engage in various forms of malpractice including blatant overstocking, really be seen to be acceptable by your department?

I would encourage you not only to reject this application, but to also engage with local communities along the western seaboard to investigate more sustainable and regenerative paths forward for our livelihoods, environment, and food chains.

Kind regards,

[redacted]

5.

**From:** [redacted]
**Sent:** Monday 29 January 2024 11:54
**To:** FinfishPC
**Subject:** Salmon Farm @ Deenish Island,Skelligs Bay, Co Kerry

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Dear Sir/Madam,

I am writing to you with regard to the above and to express my opposition to the license renewal of this fish farm. You will be aware that the licence for this facility was previously withdrawn for regulatory breaches but unfortunately this fish farm continues to wreak environmental havoc on the wild salmon and sea trout population in the Waterville / Lough Currane watershed/catchment area.

Our native salmon & sea trout are being devastated by the pollution effluent and sea lice being generated by this facility and I strongly urge you to refuse this licence and put a stop to this environmental destruction for once and for all.

Yours sincerely.

[redacted]

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



[redacted]

25/02/2024
From: [redacted]
To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division,
Ref: Deenish Island Salmon Farm license renewal application

Dear Minister McConalogue,

I write in **strong opposition** to the renewal of license to operate any type of Salmon Farm at the site commonly known as the Deenish Island, Kerry. In this decision, you have in your hands an opportunity to secure the future survival of a unique Irish species of Sea Trout known throughout the world, and contribute to the future welfare of thousands of people in the region.

I am an angler, I live [redacted] I fish Lough Currane, and the surrounding water shed lakes in this region. I'm and Irish citizen [redacted] and I have witnessed firsthand the appalling toll this salmon farm has taken on the wild Sea Trout population. I frequently take visiting family and friends to fish and stay in Waterville who want to experience excellent Sea Trout and Salmon fishing. I will travel to, and recommend, another country if this license is renewed.

With respect, I strongly encourage deciding authority for this license to carefully consider the following in reaching a decision:

1) **The lethal effects** of massive plumes of sea lice Sea Lice and waste emanating from the Salmon Farm **on juvenile Sea Trout, Salmon and all other marine life in the area.**
2) The unintended, but known, and easily anticipated consequence of the use of chemical treatments to attempt to manage the unnaturally high sea lice populations in and around the Salmon Farm.
3) The imbalance, and knock on effect to the ocean eco system by the removal of large numbers of wrasse from their natural reefs and banks along the Irish coast to be used as an ineffective method to reduce the sea lice infestations in open net salmon farms.
4) The history of blatant non-compliance of rules, regulations, and orders by this applicant and others in the industry.
5) The near collapse of the native Sea Trout population in the Waterville/Lough Currane watershed.
6) The financial burden to the state from the ongoing and future detrimental economic impact to sports tourism from both overseas and domestic visitors to the greater region. These include:
    - **Job losses** in retail shops that sell goods that support sports tourism and visitors in general.
    - **Job losses** in hotels, Inns, restaurants, cafes that have in the past benefited greatly from visiting anglers and their co-travellers to the Waterville area and Ireland over all.
    - **Job losses for** fishing guides and gillies in the greater Lough Currane and the surrounding watershed lakes and rivers,

7) The international reputation of **The Country of Ireland** as a nation willing to **honestly** weigh the:
    i) Harmful effects to the region's population, both economic and socially,
    ii) Detrimental environmental impact,
    iii) The protection of a rare and unique species of Game Fish known around the world.

Against the wishes of a business who have multiple other options to farm Salmon in a far less intrusive and harmful way from land base farms.

**Please reject this application and permanently close this region for any future "Near Shore" Salmon Farms.**

[redacted]

[redacted]



**From:** [redacted]
**Sent:** Monday 29 January 2024 12:47
**To:** FinfishPC
**Subject:** Stop a salmon farm near Waterville

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may concern,

I wish to object, in the strongest possible terms, to the proposed development of a salmon farm at Deenish Island, Co. Kerry. The site is close to Lough Currane - a hugely important wild salmon sea trout fishery.
MOWI is a company that has left a trail of destruction in many parts of the world including Ireland. Their salmon farms have had devastating impacts on wild salmon and sea trout populations.
Our ever diminishing natural resources must be protected from further damage.
The proposal must not be allowed to go ahead.

Yours faithfully

[redacted]

This email message has been scanned for viruses and malware by Mimecast Offshore. Mimecast Offshore delivers a complete email management solution from a single online platform. For more information please visit www.mimecast-offshore.com

**From:** [redacted]
**Sent:** Monday 29 January 2024 13:41
**To:** FinfishPC
**Subject:** Objection to Mowi Licence on Deenish Island

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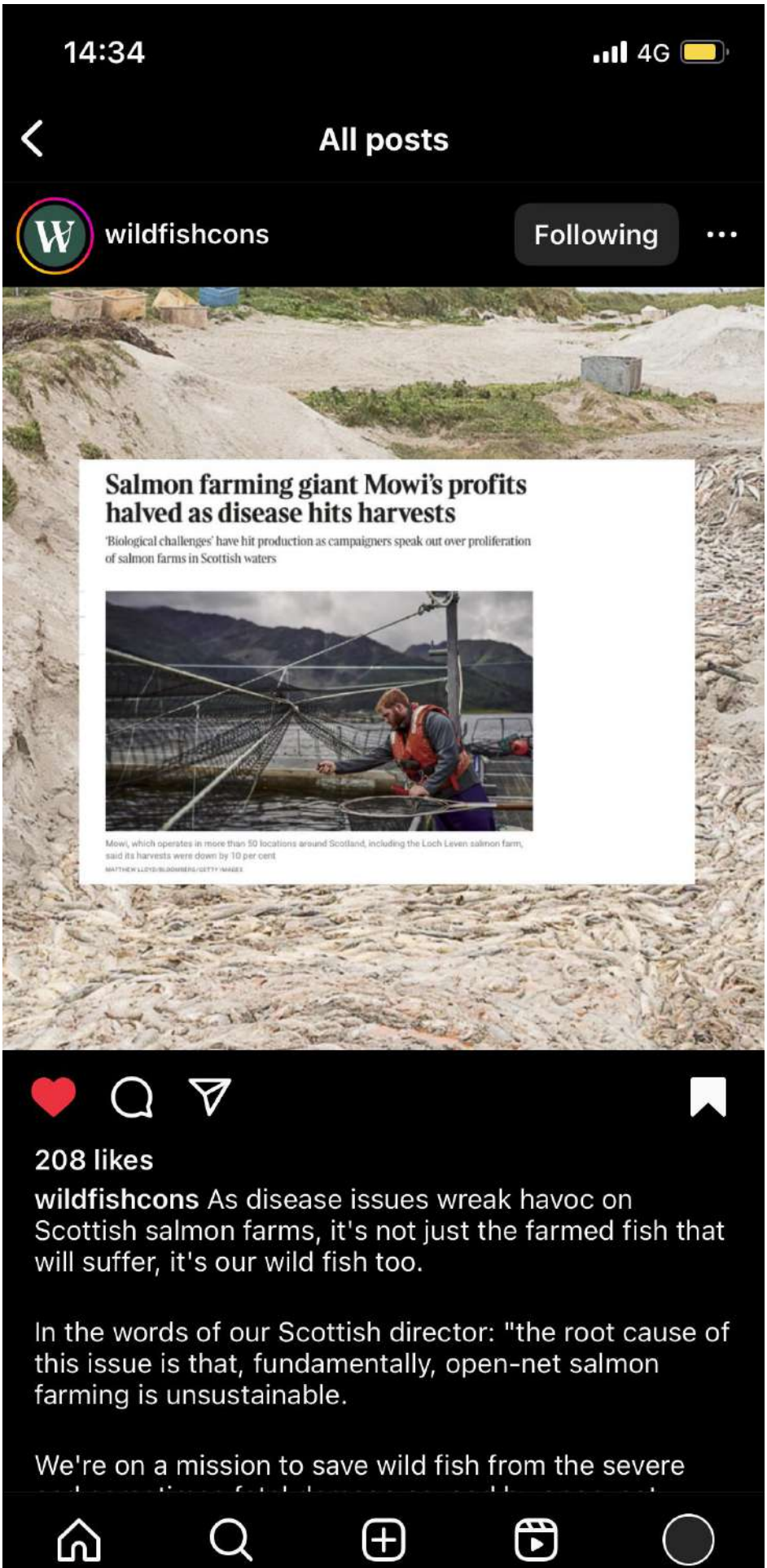
Dear Sir/Madam,

I'm astounded that I need to write this objection to the renewal of the Deenish Island Salmon farm due to the now widely recognised and heavily documented effects of Salmon farming.

It is baffling that you'd even consider licensing something that is so immoral and an ecological disaster.

We cannot afford any more salmon farms, we should be looking to restore our ecosystems not further destroy them. Salmon are a keystone species and their decline is terrifying. From 1.7m returning to Ireland in 1970's to just 150,000 today. This number will continue to decrease at dire cost to Ireland if we continue to licence new Salmon farms.

You'd be backing a dying practice, and an industry rightfully on its way out because it's unequivocally clear that offshore Salmon farming is unsustainable environmentally and economically - the bottom line however is that is a cruel, barbaric and unethical.


14:34
4G
All posts
wildfishcons
Following
Salmon farming giant Mowi's profits halved as disease hits harvests
'Biological challenges' have hit production as campaigners speak out over proliferation of salmon farms in Scottish waters
Mowi, which operates in more than 50 locations around Scotland, including the Loch Leven salmon farm, said its harvests were down by 10 per cent
208 likes
wildfishcons As disease issues wreak havoc on Scottish salmon farms, it's not just the farmed fish that will suffer, it's our wild fish too.
In the words of our Scottish director: "the root cause of this issue is that, fundamentally, open-net salmon farming is unsustainable.
We're on a mission to save wild fish from the severe

Kind regards,

[redacted]

[redacted]

From: [redacted]
Sent: Monday, January 29, 2024 2:05 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Salmon Farm

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To whom it may concern,
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MOWI is a company that has left a trail of destruction in many parts of the world including Ireland. Their salmon farms have had devastating impacts on wild salmon and sea trout populations.
Our ever diminishing natural resources must be protected from further damage.
The proposal must not be allowed to go ahead.
Best regards,

[redacted]

**From:** Rory Campbell <rory.campbell@bim.ie>
**Sent:** Monday 29 January 2024 15:11
**To:** FinfishPC
**Subject:** Re T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence Application
**Attachments:** 4126_001.pdf

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Dear Sir/Madam,

Please see attached from BIM.

Best regards,

Rory

**Rory Campbell**
Seafood Technical Services Director
**BIM**

**T** +353 01 214 4129
**M** +353 87 7657164
**E** rory.campbell@bim.ie

_____

Bord Iascaigh Mhara,
Crofton Road, Dún Laoghaire,
Co. Dublin, A96 E5A0

_____

Ireland's Seafood Development Agency
**bim.ie**

BIM Ireland's Seafood Development Agency

Bord Iascaigh Mhara
An Cheannoifig
Bóthar Crofton,
Dún Laoghaire,
Co Bhaile Átha Cliath
A96 E5A0

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T +353 (0)1 214 4100
F +353 (0)1 284 1123
www.bim.ie

Marine Finfish Unit
AFMD – Department of Agriculture, Food and Marine
National Seafood Centre
Clonakilty
Co. Cork
P85TX47

29/01/2024

**Re: T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry**

Dear Sir/Madam

BIM is supportive of the sustainable development of the salmon farming industry in Ireland to meet high market demand and create jobs in rural and coastal areas. The importance and market potential of aquaculture has been recognised by the EU and domestically under Food Vision 2030 and the National Strategic Plan for sustainable aquaculture. The value of Irish organic farmed salmon was €124 million in 2022.

We note that Finfish aquaculture has been ongoing in the region of this site since the 1980's and that MOWI has been operating in the area since 2008. It should be noted that MOWI have developed good linkages with BIM over that period and have actively participated in industry efforts to help protect and care for our coastline, seas and marine life. This is evidenced by engagement in cleanups and awareness raising exercises.

Having examined the EIAR, BIM wish to make the following comments;

*Application location and extent*
The current application is for an existing site with some spatial and conditional amendments sought. We welcome the request that the production limit be based on Maximum Allowable Biomass (MAB) as we regard this as a more appropriate parameter than a specified number of smolts or weight.

*Impacts on fishing and aquaculture.*
BIM note that this application seeks to extend the footprint of the existing site. We have reviewed this and agree with the conclusion of the EIAR and that the renewal and amendments sought will not give rise to any significant impacts on these sectors.

Should you or the applicant require any further information on our comment, BIM would be happy to provide same.

Regards

Rory Campbell
Director – Seafood Technical Services

Rialtas na hÉireann
Government of Ireland

Có-mhaoinithe ag an Aontas Eorpach
Co-funded by the European Union

**From:** [redacted]
**Sent:** Monday 29 January 2024 15:52
**To:** FinfishPC
**Subject:** T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry
**Attachments:** SalmonFarmSubmission.docx

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Please see attached letter objecting to the renewal of the above.

Regards,
[redacted]

[redacted]

The Minister for Agriculture Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen,
Clonakilty
Co. Cork
By email to finfishpc@agriculture.gov.ie

29th January 2024

**RE: T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry.**

Dear Sir,

I refer to the application of Silver King Seafoods to operate a salmon farm off Deenish Island Co. Kerry. I object to this application and I urge you to refuse this licence application.

As a visitor to the area for nearly 50 years I don't believe that there is any doubt that the decline of the Lough Currane sea trout fishery is linked to the salmon farm off Deenish Island. This collapse was even predicted before the salmon farm came into operation and mirrored that seen in the West of Ireland after the introduction of salmon farms.

The collapse of the fishery has in turn led to the economic decline of the once thriving village of Waterville and surrounding areas. The angling tourist, like the sea trout, have all but disappeared. Where there once were multiple shops and restaurants in the village there now is only a handful. Where there was once dozens of full time ghillies working on the lake there are now only a handful, none of whom are under the age of 50. Where there once were 3 hotels in the village open from January to October there is now only one open from Easter to September. All of this began with the introduction of the salmon farm off Deenish island.

The salmon farm needs to be refused permission to operate to give the sea trout population, and the local economy, a chance to recover.

Yours Faithfully,

[redacted]

**From:** [redacted]
**Sent:** Monday 29 January 2024 17:42
**To:** FinfishPC
**Subject:** Submission of Objection to T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence Application - Laune Salmon & Trout Anglers Association
**Attachments:** Objection to T06-202 Silver King Seafoods Ltd Aquaculture Foreshore Licence Application - Laune Salmon & Trout Anglers Association.pdf

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Dear Mr. McConalogue,

Please find attached submission of objection to the T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence Application from the Laune Salmon & Trout Anglers Association.

The attached objection has also been mailed to you.

Please acknowledge receipt of this email.

Regards,

[redacted]
[redacted] Laune Salmon & Trout Anglers Association.

# *Laune Salmon & Trout Anglers' Association*

**Friday 26th January 2024**

Laune Salmon & Trout Anglers' Association
[redacted]

Mr. Charlie McConalogue
Minister for Agriculture, Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty
Co. Cork, P85 TX47

FinfishPC@agriculture.gov.ie

*Sent via email & by post*

**Re. T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry**

Dear Mr. McConalogue,

We make the following submission in relation to the application by Silver King Seafoods Ltd to "cultivate salmon at a site on the foreshore east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry."

We have outlined a number of comments and observations below, which we feel make a strong case for not issuing the above licence.

In 2019, the licence for the existing facility at Deenish Island was revoked by the then Minister for Agriculture, Mr. Michael Creed. This was due to a breach of the licence conditions whereby over twice the allowable amount of salmon was harvested.

The facility continues to operate in the same way, pending an appeal decision by the Aquaculture Licensing Appeals Board. This appeal has been ongoing since 2019. A decision is yet to be made.

# *Laune Salmon & Trout Anglers' Association*

This new licence application seems to be made with an arrogant disregard to the 2019 ruling by Minister Creed. A grant of this licence would mean that over 2000 tonnes of salmon can be produced per cycle, over four times what is allowed with the current licence.

The negative environmental impact of salmon farms has been widely documented and accepted. There is no need for debate in this regard, however, for the purpose of this submission, we have outlined some of the impact in the paragraphs set forth below:

1) Sea lice infestations ( both Lepeophtheirus and Caligus elongatus) in aquaculture facilities pose considerable risk to wild salmon and sea trout populations. Migrating smolts and kelts are especially vulnerable. Sea lice infestation results in poor swimming and feeding ability, increased predation, poor body condition, secondary infection and ultimately death. Sea trout are of particular risk as they tend to reside in the bay before migrating to fresh water. In fact it has been observed that sea trout can return to fresh water prematurely to lose lice infestation;

2) Amoebic gill disease can reach epidemic proportions at salmonid aquaculture facilities, including Deenish. It is documented that this can be passed on to wild salmonids;

3) Escapees can breed with wild salmon and reduce the genetic vigour of the wild stock;

4) A reduction in numbers of wild salmonids can have a knock on effect on other areas of our ecosystem. For example, the pearl mussel relies on juvenile salmonids as a lifecycle host for the mussel larvae;

5) Many aquaculture facilities, including Deenish, have had mortality rates approaching 40%. From an animal welfare perspective this is totally unacceptable. Any other form of modern agriculture with mortality rates such as this would be closed down. The salmon farm at Deenish Island should be no different;

6) Since the opening of the Deenish Island salmon farm in 1990, there have been catastrophic environmental, social and economic consequences for the Waterville and Lough Currane area. This is due to the collapse of the Currane system sea trout stocks, which can be directly correlated with the opening and expansion of the Deenish Island facility. This site is only 10.2 kilometres from the mouth of the Waterville river;

7) In the early 1990's, higher levels of sea lice were recorded on sea trout sampled from the Waterville system;

# *Laune Salmon & Trout Anglers' Association*

8) In 1992 there was a collapse of sea trout stocks in Waterville. This coincided with the second year of production at Deenish, with grower fish and great levels of sea lice;

9) The Deenish farm closed in 2004 and 2006 was the first year in over 15 years that no fish farm operated in Ballinskelligs Bay or Kenmare Bay. It remained closed until 2010. During this period sea trout numbers improved well, with 2009 and 2010 showing large stocks of spawning fish;

10) In 2011, high levels of production commenced at Deenish and with it came a dramatic collapse of sea trout stocks. This decline has continued to date with a virtual disappearance of spawning stock.

The Waterville/Currane Fishery was once the premier sea trout fishery in Europe, world renowned for its specimen sea trout and large runs of salmon. This has been single handedly decimated by Mowi/Silver King Seafoods Ltd. and the powers that be who facilitated it. The angling tourism industry that was once the backbone of Waterville is now dead and Lough Currane is largely deserted.

Countless jobs have been lost as a direct result of this travesty as Waterville has lost its place on the map as a fishing destination. In contrast, Mowi/ Silver King Seafoods Ltd.'s new licence application states that it aims to employ seven people.

In 2018, in response to the collapse in stocks, Inland Fisheries Ireland (IFI) introduced a by-law imposing catch and release only angling for sea trout. This move, while positive and fully embraced by anglers, was a sure sign that the Currane sea trout had reached its demise. Practising catch and release was one of the few actions within the control of anglers and IFI that could help protect sea trout stocks. Sadly, all involved knew that this was futile, when the root of the problem lay 10.2km out the bay at Deenish Island.

The Currane system is located in a Special Area of Conservation. What a meaningless title this is when we are unable to conserve the salmon and sea trout that have been migrating to these waters for thousands of years.

Salmon and sea trout are resilient creatures. They have been known to re-inhabit river systems where they have been all but wiped out. We can see how this happened in the 2006-2010 period when the Deenish salmon farm was closed. 2009 and 2010 recorded excellent catches, reminiscent of pre-Deenish salmon farm times.

# *Laune Salmon & Trout Anglers' Association*

This gives us hope. Hope that if the Deenish facility is closed, that there might just be enough genetic stock left for the Currane salmon and sea trout to return.

To conclude, we hope we have made it quite clear why this licence should not be granted. In fact, one could say, there is no reason why it should be granted. It will have zero benefits for the South Kerry area. The only beneficiaries here are Mowi and their associates. We hope that the Department for Agriculture, Food and the Marine will do the right thing and put an end to the Deenish site once and for all.

Yours sincerely,

Laune Salmon & Trout Anglers' Association

Signed: [redacted]

[redacted] Chairman

[redacted] Hon. Secretary

**From:** [redacted]
**Sent:** Monday 29 January 2024 20:54
**To:** FinfishPC
**Subject:** Objection xxxxxxxxxxxxx

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To Whom it may concern

I would like to strongly object to the renewal of the license for the fish farm at Deenish island. The farms in this area are over producing year on year and they are having a devastating effect on our natural wild salmon and sea trout stocks.

Hi Loch Currane has seen an unbelievable decrease in the number of sea trout stocks over the last number of years and has gone from one of the greatest sea trout fisheries to in Europe to quite possibly the worst.

We need to help preserve our natural wild stocks not only for the sake of the species but also for the tourists the fishing brings to the area and the knock on effect that it has for the restaurants and accommodation in the area.

Kind regards

[redacted]

From: [redacted]
Sent: Monday, January 29, 2024 8:55 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection xxxxxxxxxxxx

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Dear Sir/Madam,
45 years fishing in Kerry and I've experience the decline in seatrout and salmon stocks firsthand.
The fish retuning covered in sea lice and not returning. The use of Nuvam and other pesticides at the fish farm sites Create's living clouds of sea lice which attach themselves to wild fish.
A rod and line caught salmon is worth many times more to the economy than a farmed salmon sold on a plate. The hotel room, the petrol pump the local guide.
Stop fish farms - my family and I can and will return to Kerry to fish like we have done for 60 years.

Sincerely,

[redacted]
Sent from my iPhone

Aquaculture & Foreshore Management Division
30 JAN 2024
Department of Agriculture, Food & The Marine

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

Aquaculture & Foreshore Management Division
30 JAN 2024
Department of Agriculture, Food & The Marine

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

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Signed [redacted]

Aquaculture & Foreshore Management
30 JAN 2024
Department of Agriculture, Food & The Marine

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

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Signed: [redacted]

Aquaculture & Foreshore Management Division
30 JAN 2024
Department of Agriculture, Food & The

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
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Sign [redacted]

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30 JAN 2024
Department of Agriculture, Food & The Marine

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Signed [redacted]

[redacted]

0118

Management Division
30 JAN 2024
Department of Agriculture, Food & The Marine

From: [redacted]
Address:

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

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Aquaculture & Foreshore Management Division
30 JAN 2024
Department of Agriculture, Food & the Marine

From:
Address: [redacted]

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Signed [redacted]

Submission/Observation #0120 invalid in accordance with Regulation 9(4) of the Aquaculture (Licence Application) Regulations, 1998, as amended and shall not be considered in accordance with Regulation 9(5) of the Aquaculture (Licence Application) Regulations 1998, as amended.

**From:** [redacted]
**Sent:** Tuesday 30 January 2024 15:08
**To:** FinfishPC
**Subject:** Application for the renewal of an aquaculture licence at Deenish Island ref T06 / 202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

The Minister for Agriculture Food and the Marine,

Dear Sir
I am writing to object to the renewal of the aquaculture licence of MOWI at Deenish Island, Derrynane, Co Kerry. I am a partime resident [redacted] Over this period I have witnessed the run of salmanoids decline and ultimately collapse. This sequence coincides with the level of production at the salmon farm at Deenish Island – the farm started production in 1990 however it closed in 2004 and remained closed until 2010. The farm restarted and dramatically expanded production in 2010 which coincided with a decline and ultimate collapse in the number of salmon and particularly sea trout returning to Lough Currane. May I refer you to the Irish Specimen Fish Awards – in 2009 (a year prior to the farm reopening) there were 26 specimen sea trout caught on the Currane catchment, this number gradually declined over the ensuing years – sadly there have been none recorded in the last few years. In my opinion the salmon farm is a major contributor to this collapse.
Of course this has a negative impact on the number of visiting anglers to Waterville. Lough Currane was widely considered to be the jewel in the crown of sea trout fisheries in the UK and Ireland and had a huge number of visiting anglers every year – due to a unique strain of sea trout which are long lived and grow to a large size. Again reference to the Irish Specimen Fish awards is insightful – when there were large numbers of sea trout recorded in Ireland the vast majority were captured in Lough Currane. Given this dramatic decline there is an imminent danger that this unique strain of sea trout will become extinct. However the good news is that numbers will recover if the salmon farm ceases production – this was demonstrated by the high numbers recorded in 2009 after the farm had been closed for 5 years.
In my opinion salmon farms should be moved onshore where effluent, sea lice numbers and disease could be controlled and restricted.
Your sincerely
[redacted]

122

Aquaculture & Foreshore Management Division
AN 2024
& The Marine

From:
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
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Signed [redacted]

Aquaculture & Foreshore Management Division
- 7 FEB 2024
Department of Agriculture, Food & The Marine

Submission/Observation #0123 invalid in accordance with Regulation 9(2) of the Aquaculture (Licence Application) Regulations, 1998, as amended.

**From:** [redacted]
**Sent:** Wednesday 31 January 2024 12:02
**To:** FinfishPC
**Subject:** Deenish Island MOWI Salmon Farm License Application Objection
**Attachments:** The Guardian article on Scottish Open Net Salmon Farming - 30 January 2024.pdf

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear sir/madam,

**Objection to the Granting of a Salmon Farming License - Deenish Island**

I wish to object to the granting of a license for MOWI salmon farms (Deenish Island in particular) to continue polluting the estuarine waters and wiping out wild native salmon and sea trout through disease, parasites and escapees cross breeding and weakening the genetic strain of the wild population.

The open net salmon farming system is banned by most countries. It has very high mortality rates and just pollutes the local environment with uneaten feed, chemicals applied to the water to kill parasites, fungal disease and salmon faeces.

Salmon smolt mortality in estuaries with salmon farms is around 50%, with parasites such as sea lice being in plague proportions.

It is no wonder that our wild salmonid stocks are teetering on extinction.

Please see attached article from "The Guardian" UK newspaper which puts the situation into context and gives a good indication of the global objection to open net salmon farming.

Yours faithfully,

[redacted]



Seascape: the state of our oceans

# 'Unacceptable greenwashing': Scottish farmed salmon should not be labelled organic, say charities

## Open letter calls for Soil Association certification to be removed from industry, amid concerns of negative environmental impact

Seascape: the state of our oceans is supported by

the guardian .org

About this content

**Karen McVeigh**

@karenmcveigh1

Tue 30 Jan 2024 08.00 GMT

The British body that certifies food in the UK as organic has been accused of misleading consumers over its labelling of Scottish farmed salmon.

Thirty charities, conservation and community organisations, including WildFish, the Pesticide Action Network and Blue Marine Foundation, say the negative environmental impacts of the industry in Scotland "run completely counter" to the principles of the Soil Association's promotion of healthy, humane and sustainable food.

In an open letter to the association, which plans to update its organic fish farming standards, the groups call for the removal of its certification of Scottish salmon and trout farms, as "unacceptable greenwashing of an unsustainable industry".

In December, the broadcaster and presenter Chris Packham called for a halt to the growth of salmon farms in Scotland, as official figures suggested farmed salmon mortality had hit record levels in 2023. Packham, the president of the Royal Society for the Prevention of Cruelty to Animals (RSPCA), said the industry was "catastrophic" for fish welfare and Scotland's environment.

Salmon farms certified as organic by the Soil Association are required to show how they will minimise their impact on the aquatic environment, and maintain lower population densities than those required by other standards, including the RSPCA standard.

Rachel Mulrenan, WildFish's Scotland director, said: "So-called 'organic' Scottish salmon is a misnomer. The fish are raised in the same way as all Scottish farmed salmon - in open-net cages, where all the waste from the farm flows straight into the surrounding lochs and sounds, including faeces and uneaten feed."

She said that salmon farms certified organic were permitted to use highly toxic chemicals, which could kill surrounding wildlife. They also used wild-caught fish to produce feed and for parasite control, with unknown environmental impacts, she claimed.

Intensive salmon farming creates a breeding ground for parasites including sea lice and other diseases and can threaten wild salmon populations, if escapees breed with wild fish.

A report published by WildFish last year, Responsibly Farmed?, said one Soil Association organic certified salmon farm had applied multiple treatments of the chemical pesticide deltamethrin, which is highly toxic to marine species.

The groups said that the updated standards for fish farms proposed by the Soil Association in its consultation continued to permit toxic chemicals such as deltamethrin and did not address concerns that high mortality rates were "indicative of an unsustainable industry".

More than 160 chefs and restaurants, as well as 50 community groups, charities and NGOs have joined WildFish's Off the table campaign to remove farmed salmon from their menus.

Claire Mercer Nairne, the owner of supporting Perthshire restaurant The Meikleour Arms, said: "Many well-meaning restaurants serve farmed salmon because of reassuring organic certification. Organic for most people means better for the environment, but unfortunately in this instance that could not be further from the truth."

A Soil Association spokesperson said farms with the organic logo must follow "strict rules" to minimise environmental impact and ensure animal welfare, and must prove they take action when problems occur.

"We recognise there is still much work to be done to further improve fish farming, and that is why we are working with the sector to drive improvements forward."

The spokesperson, who said the association certified 20 fish farms in the UK, said their rules were having a wider impact, as they were being adopted by the non-organic sector.

The Soil Association was concerned about the impacts of chemical parasite treatments, such as deltamethrin, and its use as a medicine was "very strictly controlled", said the spokesperson, who added that farms must demonstrate it was being used a last resort to protect the welfare of the fish, with minimal impact on the environment.

Tavish Scott, the chief executive of Salmon Scotland, said: "Scotland's salmon farmers consistently meet the highest international standards and third-party assurance - including organic certification - will continue to play an important part in ensuring Scottish salmon remains the best in the world. We won't let that global success be put at risk from a handful of urban-based activist groups."

Advertisement

## Most viewed

Advertisement




From:
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

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Aquaculture & Foreshore Management Division
31 JAN 2024
Department of Agriculture, Food & The Marine

# Laune Salmon & Trout Anglers' Association

Aquaculture & Foreshore Management Division
31 JAN 2024
Department of Agriculture, Food & The Marine

**Friday 26th January 2024**

Laune Salmon & Trout Anglers' Association
[redacted]

Mr. Charlie McConalogue
Minister for Agriculture, Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty
Co. Cork, P85 TX47

31 JAN 2024
Department of Agriculture, Food & The Marine

FinfishPC@agriculture.gov.ie

*Sent via email & by post*

**Re. T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry**

Dear Mr. McConalogue,

We make the following submission in relation to the application by Silver King Seafoods Ltd to "cultivate salmon at a site on the foreshore east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry."

We have outlined a number of comments and observations below, which we feel make a strong case for not issuing the above licence.

In 2019, the licence for the existing facility at Deenish Island was revoked by the then Minister for Agriculture, Mr. Michael Creed. This was due to a breach of the licence conditions whereby over twice the allowable amount of salmon was harvested.

The facility continues to operate in the same way, pending an appeal decision by the Aquaculture Licensing Appeals Board. This appeal has been ongoing since 2019. A decision is yet to be made.

# Laune Salmon & Trout Anglers' Association

This new licence application seems to be made with an arrogant disregard to the 2019 ruling by Minister Creed. A grant of this licence would mean that over 2000 tonnes of salmon can be produced per cycle, over four times what is allowed with the current licence.

The negative environmental impact of salmon farms has been widely documented and accepted. There is no need for debate in this regard, however, for the purpose of this submission, we have outlined some of the impact in the paragraphs set forth below:

1) Sea lice infestations ( both Lepeophtheirus and Caligus elongatus) in aquaculture facilities pose considerable risk to wild salmon and sea trout populations. Migrating smolts and kelts are especially vulnerable. Sea lice infestation results in poor swimming and feeding ability, increased predation, poor body condition, secondary infection and ultimately death. Sea trout are of particular risk as they tend to reside in the bay before migrating to fresh water. In fact it has been observed that sea trout can return to fresh water prematurely to lose lice infestation;

2) Amoebic gill disease can reach epidemic proportions at salmonid aquaculture facilities, including Deenish. It is documented that this can be passed on to wild salmonids;

3) Escapees can breed with wild salmon and reduce the genetic vigour of the wild stock;

4) A reduction in numbers of wild salmonids can have a knock on effect on other areas of our ecosystem. For example, the pearl mussel relies on juvenile salmonids as a lifecycle host for the mussel larvae;

5) Many aquaculture facilities, including Deenish, have had mortality rates approaching 40%. From an animal welfare perspective this is totally unacceptable. Any other form of modern agriculture with mortality rates such as this would be closed down. The salmon farm at Deenish Island should be no different;

6) Since the opening of the Deenish Island salmon farm in 1990, there have been catastrophic environmental, social and economic consequences for the Waterville and Lough Currane area. This is due to the collapse of the Currane system sea trout stocks, which can be directly correlated with the opening and expansion of the Deenish Island facility. This site is only 10.2 kilometres from the mouth of the Waterville river;

7) In the early 1990's, higher levels of sea lice were recorded on sea trout sampled from the Waterville system;

# Laune Salmon & Trout Anglers' Association

8) In 1992 there was a collapse of sea trout stocks in Waterville. This coincided with the second year of production at Deenish, with grower fish and great levels of sea lice;

9) The Deenish farm closed in 2004 and 2006 was the first year in over 15 years that no fish farm operated in Ballinskelligs Bay or Kenmare Bay. It remained closed until 2010. During this period sea trout numbers improved well, with 2009 and 2010 showing large stocks of spawning fish;

10) In 2011, high levels of production commenced at Deenish and with it came a dramatic collapse of sea trout stocks. This decline has continued to date with a virtual disappearance of spawning stock.

The Waterville/Currane Fishery was once the premier sea trout fishery in Europe, world renowned for its specimen sea trout and large runs of salmon. This has been single handedly decimated by Mowi/Silver King Seafoods Ltd. and the powers that be who facilitated it. The angling tourism industry that was once the backbone of Waterville is now dead and Lough Currane is largely deserted.

Countless jobs have been lost as a direct result of this travesty as Waterville has lost its place on the map as a fishing destination. In contrast, Mowi/ Silver King Seafoods Ltd.'s new licence application states that it aims to employ seven people.

In 2018, in response to the collapse in stocks, Inland Fisheries Ireland (IFI) introduced a by-law imposing catch and release only angling for sea trout. This move, while positive and fully embraced by anglers, was a sure sign that the Currane sea trout had reached its demise. Practising catch and release was one of the few actions within the control of anglers and IFI that could help protect sea trout stocks. Sadly, all involved knew that this was futile, when the root of the problem lay 10.2km out the bay at Deenish Island.

The Currane system is located in a Special Area of Conservation. What a meaningless title this is when we are unable to conserve the salmon and sea trout that have been migrating to these waters for thousands of years.

Salmon and sea trout are resilient creatures. They have been known to re-inhabit river systems where they have been all but wiped out. We can see how this happened in the 2006-2010 period when the Deenish salmon farm was closed. 2009 and 2010 recorded excellent catches, reminiscent of pre-Deenish salmon farm times.

# Laune Salmon & Trout Anglers' Association

This gives us hope. Hope that if the Deenish facility is closed, that there might just be enough genetic stock left for the Currane salmon and sea trout to return.

To conclude, we hope we have made it quite clear why this licence should not be granted. In fact, one could say, there is no reason why it should be granted. It will have zero benefits for the South Kerry area. The only beneficiaries here are Mowi and their associates. We hope that the Department for Agriculture, Food and the Marine will do the right thing and put an end to the Deenish site once and for all.

Yours sincerely,

Laune Salmon & Trout Anglers' Association

Signed:

[redacted] - Chairman

[redacted] n, Secretary

**From:** [redacted]
**Sent:** Wednesday 31 January 2024 14:42
**To:** FinfishPC
**Cc:** brendan.griffin@oir.ie; charlie.mcconalogue@oireachtas.ie
**Subject:** Fish Farm at Deenish Island

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Good afternoon,

I oppose the renewal of the licence of the fish farm at Dennish Island for several reasons. The reasons are listed below:

1. Over stocking:
The operators of this fish farm have been found to be holding more than the maximum limit of fish on more than one occasion. This has happened twice that I am aware of.
This shows a lack of respect for the local environment, laws and licensing system. There is excess pollution and damage to the environment caused by overstocking.
There is no guarantee that the operators would conform to any new licence conditions. In fact they may flout them again.

2. Ligation
When the licence was revoked by the Department of Agriculture, the operators sought to frustrate this decision by way of the courts. They continually sought adjournments and would not proceed to a full hearing for more than two years.
Again, it shows the contempt this operator has for the laws by seeking to frustrate their implementation. This has increased the cost to the state and taxpayers. Granting this farm a new license would be a reward for this ligatous and unethical behaviour. Who would be deterred by licence conditions if the Department of Agriculture was not bothered to enforce them?

3. Damage to Local Environment & Fish stocks
Waterville lake is a very important reservoir of wild sea trout and salmon. This population flourished until this fish farm became operational. Fish farms are destructive to the environment in the immediate vicinity of the cages. The sea beneath the cages resembles a desert and is dead to all sea life. This is caused by chemicals used to control diseases, sea lice, and other pollution.
Also the fish have to pass near the cages on their way to sea as juveniles and to spawn as adults. Studies have shown that in areas where fish farms are situated this results in plague of sea lice which attach to the fish and terminally weaken them. Fish numbers may never recover and may decline further if this fish farm licence is renewed or under the present new application increased in size.

4. Local Economy
The local economy greatly benefits from tourist anglers and their families who fish Waterville lake and the River Inny. Anglers come from all over the world to fish in Waterville. They may also visit to play Golf and fish for sea trout like Tiger Woods. The visitor numbers have dropped significantly in the last few years due to falling numbers of wild trout & salmon reaching the rivers and lakes. This catchment area is

a major tourist resource for the Irish people and future generations. it would be a crime to let it be destroyed.
I believe the tourist income derived from the area is in excess of the income to the area from this fish farm. There have been several studies that have confirmed this view.

*Regards*

[redacted]

**From:** [redacted]
**Sent:** Wednesday 31 January 2024 16:09
**To:** FinfishPC
**Subject:** Proposed renewal of Licence
**Attachments:** Salmon Farm - Deenish template letter for all.pdf

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Sent from my iPhone

From:
Address:

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

**From:** [redacted]
**Sent:** Wednesday 31 January 2024 17:08
**To:** FinfishPC
**Subject:** T06/202 Aquaculture Licence & Foreshore Licence Application for Salmon farm at Deenish Island, Co Kerry
**Attachments:** Ref T06 202 observation.pdf

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Le meas,

[redacted]

From:
Address [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

**From:** [redacted]
**Sent:** Wednesday 31 January 2024 18:05
**To:** FinfishPC
**Subject:** Deenish fish farm

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I am writing to you against the Deenish fish farm aplication for the following reasons.

1. **Environmental Impact:** Intensive fish farming can lead to environmental issues such as water pollution, excess nutrients, and habitat destruction.

2. **Disease Spread:** High-density conditions in fish farms can facilitate the spread of diseases among the fish, requiring the use of antibiotics and other chemicals.

3. **Escape of Farmed Fish:** There is a risk of farmed fish escaping into the wild, potentially affecting local ecosystems and wild fish populations.

4. **Feed Dependency:** Fish farms often require large amounts of fish meal or other protein-rich feeds, which can contribute to overfishing and impact marine ecosystems.

5. **Genetic Concerns:** Interbreeding between farmed and wild fish can lead to genetic issues in wild populations, affecting their adaptability and survival.

6. **Energy Consumption:** Running fish farms may require significant energy inputs for water circulation, temperature control, and other operational needs.

7. **Social Issues:** In some cases, fish farming can lead to social conflicts over land use, water rights, or traditional fishing territories.

It's important to note that sustainable and well-managed fish farms can address some of these concerns, and advancements in aquaculture practices aim to mitigate environmental and social impacts.Although the general tone in Waterville is againist this.Many fish are also being eaten by sea lice before they even go out to sea (Sea lice are tiny crustaceans that parasitize marine fish. They belong to the family Caligidae. These small organisms attach themselves to the skin, fins, and gills of fish, where they feed on the host's blood, mucus, and skin tissue. Sea lice can be a significant issue in aquaculture, particularly in salmon farms.)

In conclusion the Deenish fish farm is bad for the Waterville ecosystem and generaly terrible for salmon and sea trout.

**From:** [redacted]
**Sent:** Thursday 1 February 2024 09:20
**To:** FinfishPC
**Subject:** Foreshore licence application T06-202

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To whom it concerns I wish to object to the Foreshore licence application T06-202 due to its impact on the run of wild salmon and seatrout back to lough Currane.
Having fished Currane over the last 30 years I have seen the continuous decline in wild fish stocks year on year to the point that it is barely worth fishing there anymore.
This in itself impacts local businesses providing hospitality and boat rental.
There are numerous scientific reports showing the impact of sea lice infestation on returning wild stocks and the association of sea lice with Salmon farming.
I understand the need for Salmon farms but not in this particular location.

Regards
[redacted]





**From:** [redacted]
**Sent:** Thursday 1 February 2024 15:58
**To:** FinfishPC
**Subject:** Reference T06/202 Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry - OBJECTION.

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Dear Minister,

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.
2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.
3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.
4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.
5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.
6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.
7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Friday 2 February 2024 12:53
**To:** FinfishPC
**Subject:** Urgent Appeal: Reject License Renewal Application (T06/202) - Preserve Our Precious Sea-Trout Populations

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Dear Minister McConalogue,

I trust this letter finds you in good health. I am writing to you today as a concerned citizen and an avid fly fisherman with a deep-rooted connection to Lough Currane and waters surrounding Deenish Island, Co. Kerry. I am compelled to bring to your attention the critical matter at hand, the Aquaculture/Foreshore License renewal application (T06/202) submitted by Silver King Seafoods Ltd.

Over the past 25 years, I have frequented Lough Currane, a once-renowned haven for sea-trout enthusiasts like myself. Regrettably, the introduction of salmon farms off the coast of Kerry has inflicted severe damage on the sea-trout populations in this cherished location. Scientific evidence overwhelmingly supports the detrimental impact of salmon farms on native sea-trout populations, and I implore you to consider this evidence in your decision-making process.

As the elected representative entrusted with safeguarding the interests of the people, I appeal to you to be our voice in rejecting this license application. The devastating effects of salmon farms are not just confined to the aquatic ecosystem; they reverberate through our communities, impacting local businesses, anglers, Ghillies, and the hospitality sector.

Lough Currane, once celebrated as one of Europe's premier Sea Trout destinations, has witnessed a precipitous decline in sea-trout catch rates since the proliferation of salmon farms. The economic repercussions are felt as well, with recreational fishermen, like myself and my fellow anglers, redirecting our investments away from areas affected by dwindling sea-trout stocks.

Allow me to draw your attention to the alarming decline in specimen sea-trout catches over the years, starkly evident in the Irish specimen records. In 2009, the lake boasted 25 Specimen sea trout (96% of sea trout specimens in Ireland). However, the rapid decline following the reopening of the farm in 2010/2011 is unmistakable, reaching a disheartening point where no specimens were caught in 2012 and beyond. The latest records from 2018 to 2021 reveal a distressing trend of zero to minimal specimen sea-trout catches, underscoring the urgency of our plea.

As passionate recreational fishermen investing significantly in our pursuit of sport, we look to you for support against the encroaching threat of fish-farms. I've heard fellow anglers passionately express their concerns on Podcasts like "Ireland on the Fly," pleading for governmental intervention to curb the devastation caused by fish-farms on our natural stocks.

Minister, this is your opportunity to demonstrate your commitment to the well-being of our communities, anglers, the livelihoods of Ghillies, and the preservation of our natural resources. I implore

you to stand with us, to protect the invaluable ecosystems that define our national heritage. Please, do the right thing and reject the license renewal application submitted by Silver King Seafoods Ltd.

Thank you for your time and consideration. Your support is pivotal in preserving the beauty and ecological balance of our cherished waters.

Best Regards,
[redacted]

**From:** [redacted]
**Sent:** Friday 2 February 2024 14:24
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** Fish farm at Deenish Island

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Dear Sir/Madam,

I would like to add my voice to those objecting to the fish farm at Deenish Island.

There is no doubt that marine salmon farming has a devastating effect on wild salmonid stocks and the operation of a fish farm at this site has adversely affected the sea trout fishery in the Waterville area. Lough Currane, once a world-renowned sea trout fishery, is only a shadow of its former self. The degradation of the fishery has directly coincided with fish farming in this area.

I would strongly urge you to ensure that MOWI, who are known to have previously overstocked and broken the conditions of their operating licence, should NOT be allowed to renew activities that have such dire consequences, not only directly on wild fish stocks, but also indirectly on the local economy that depends on the health and viability of our natural resources.

Yours sincerely,

[redacted]

From: [redacted]
Sent: Friday, February 2, 2024 6:16 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Fish farming expansion.

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To whom it may concern.

I object most strongly to any expansion of fish farming in South West Ireland.
The damage caused by your industry is well documented and your industry has a long record of not meeting its legal, environmental obligations.

[redacted]
Sent from my iPad

From: [redacted]
Sent: Sunday, February 4, 2024 3:52 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Aquaculture Licence Application T06/202

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Please see attached letter of objection to the award of the licence ref T06/202

Yours
[redacted]

The Minister for Agriculture, Food and the Marine 5th Feb 2024
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty
Co Cork
P85 TX47

Minister
REF: Aquaculture Licence Application T06/202

I object to the award of the above licence.
The application states that it is a request for a review and renewal of an aquaculture and foreshore licence.
The size and scope proposed are so far removed from the existing operation at Deenish Island (old licence 500T, new licence application 2200T) that this must be considered as a NEW APPLICATION.

A fish farm of the proposed scale and in this location, with the effluent, food and chemical waste that it will be produce and the collateral damage that will result are a threat to the wildlife and humans that frequent these environs above and below the surface.

The location is directly outside Derrynane Harbour. A very popular area for swimming and watersports
It is directly below the viewing area at Comakista on our pristine Wild Atlantic Way where there is a set of viewing binoculars so our tourists can get a closer look at the proposed eyesore.

Salmon and seatrout stocks have been decimated in Lough Currane since this fish farm started operating. The lice from the cages kill the young migrating fish which are attracted to the cages because of the

overspill of food. In the two years when the farm was fallow the stock of returning fish recovered significantly.
The lice are the biggest problem in this industry.
What method do Silver King Seafoods Limited/Mowi propose to use to control the lice on their salmon. Chemical or Cleaner fish or Hot water? All equally cruel.
Seatrout is a protected species. The department has a legal obligation to do everything it can to stop their complete disappearance and help stocks to recover. The granting of a licence for this proposal will only contribute to their further demise.

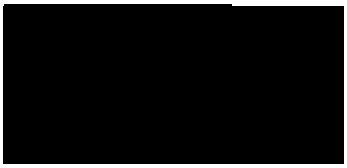
The employment that used to be generated by visiting anglers to this once world famous fishing area needing boats, gillies, accommodation and sustenance, outnumbers hundreds of times the amount of employment and economic benefit generated by what is an automated intensive force feed farming system the profits of which will go to the shareholders in a Norwegian company.

The applicants describe their operation that produces these fish as sustainable. It is fact that for every meal we get from farmed salmon it takes five equivalent meals to produce the fish. Protein is harvested from the sea off Africa to produce the feed. Protein that is no longer available to feed the people that live in that region.
Soya is grown on reclaimed land to make the fish food.
Farmed salmon is not sustainable.

A fish farm will not clean the sea around our shore. It can only pollute. NO level of new additional pollution can be tollerated.
If Mowi/Silver King want to farm salmon in Ireland in a fashion that does not damage Irish costal waters then they should consider a land based operation where the chemical used to control the sealice and the effluent can be filtered out and the risk of escapees is removed entirely. This is now considered best practice and the only type of licence issued in some countries where formerly salmon were farmed in sea cages.

There is no upside to Ireland in granting the award of this licence.
The opposite is the case.
Again, I would ask that this application is rejected

Yours,



From: [redacted]
Sent: Sunday, February 4, 2024 8:04 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Mowi Rwnewal application for adwwnishisla salmon farm. Site ref: T06/202.

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Dear Minister McConalogue,

I wish to object to the renewal of the MOWI Deenish licence application on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed in 2019 for overstocking by 121%.
Minister, if you renew this licence you will be rewarding MOWI for breaking the conditions of their licence and set a dangerous precedent for future licence infringement cases.
As the Deenish salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA, the EU Habitats Directive precautionary principles should apply and the MOWI renewal application should be refused .
Yours sincerely
[redacted]
Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 5 February 2024 09:08
**To:** FinfishPC
**Subject:** T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry

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Dear Sirs,

I have been fishing in Lough Currane,Kerry for 38years,fishing for sea trout and salmon.During this time Inland Fisheries Ireland have greatly improved the water quality by vigilant closing down and removing polluters from the catchment area.

The Ghillies from Lough Currane have run their own salmon hatchery, enhanced and cleaned the spawning streams allowing sea trout and salmon to access their spawning areas.

This has been done to enable anglers from Europe to come to fish for the world renown sea trout in the Lough.

In 2011 a record seatrout of 13lb 5oz was caught on the Lough.

For the last three years strict catch and release policy has been in place due to declining numbers of sea trout,returning to the Lough.

Every country that has allowed salmon farming in its costal waters has seen rapid decline in its sea trout and natural salmon stocks.

I urge you to reject this application to have an open-pen salmon farm on this site.Reasons set out below.

Ireland,and Kerry in particular, has a reputation of producing top class seafood produce, crabs,lobster and shrimp, from its costal waters this produce could be under threat if open-pen salmon farming goes ahead.

Unfortunately Open-pen salmon farming produces vast numbers of sea lice, because of the warm and relatively static water movement, these parasites feed on the salmon in the pens.

The chemical used to control these sea lice, which are crustaceans, would also destroy crabs lobster and shrimps.

In Scotland in 2015 19.6million gallons of Hydrogen Peroxide,the chemical used in sea lice control, was released into salmon pens.

Open-pen farms allow fish faeces,excess food and sea lice chemicals to drop to the sea bed under the pens, these areas then become barren and toxic to other forms of sea life.(source Irish Times 26/01/2023)

These sea lice attack and affect the natural salmon and sea trout stocks that swim too close to the pens.More so sea trout which are costal feeders and become badly affected.

Another big problem is escaped farmed salmon interbreeding with natural stocks in Scotland in 2023, 50,000 farmed salmon escaped from farms(source aquaculture.scotland.gov.uk)

Marine Scotland sampled 252 sites in research into interbreeding they found:
8.9% Weak genetic change
8.4%. Moderate genetic change
5.9%. Major genetic change

This form of interbreeding destroys for ever the natural stocks.

In Iceland to protect the integrity of their natural salmon stocks divers with spear guns have been deployed to kill escaped farmed salmon after pen was breached.

In 2020 MOWI was fined $6million for an escape of 690,000 salmon from a farm in Chile.

In 2021 48,000 fish escaped from MOWI cage in Scotland,17 rivers in Scotland and England reported the presence of farmed fish from that escape in their waters.

In Scotland in 2022, 16.7 million farmed salmon died BEFORE being harvested,(source Fish Health Inspectorate data)

In August 2023 3million died prematurely before harvesting.

I urge you to reject this application because of the environmental damage that sea lice infestations have on natural salmonids populations.This is a major as yet unsolved problem of salmon farming.

The impact on local communities that depend on rod anglers and tourism for their livelihood.Waterville's tourism is solely dependant on Lough Currane fishing.

No fish-No anglers-No jobs for Ghillies,Resturant staff,Hotel staff.

**From:** [redacted]
**Sent:** Monday 5 February 2024 16:29
**To:** FinfishPC
**Subject:** Lough Currane

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To whom it may concern.

I am writing to you to express my strongest objection to the licence of the fish farm operating outside Waterville.
It has devastating the world famous Sea Trout fishing that used to be available in Currane.

I have fished there for a number of years and watched the rapid decline.
I drive a [redacted] round trip to fish and use a number of local b+bs and restaurants and garages on the way down.
I also use a local gillie whose knowledge of the water is second to none.
The average Salmon costs me the bones of 1000 euros.

I hope that 2 or 3 jobs on a fish farm will not ruin the livelihood of numerous business's and families depending on the beautiful Sea Trout return.

Regards
[redacted]

**From:** [redacted]
**Sent:** Monday 5 February 2024 17:51
**To:** FinfishPC
**Subject:** T06/202 xxxxxxxxxxxxxxx

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To whom it concerns,

I wish to object to the renewal of the salmon farm's licence under reference T06/202 and request that it be declined.

Kind Regards,

[redacted]

**From:** [redacted]
**Sent:** Monday 5 February 2024 17:58
**To:** FinfishPC
**Subject:** Deenish Island licence renewal objection

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[redacted]

[redacted]

[redacted]

[redacted]

Dear Minister McConalogue,

I object to the Deenish Salmon Farm licence application Ref: T06/202 on environmental grounds and in concern for the dramatic decline in wild salmon and seatrout returning to our rivers. There are numerous scientific papers written showing indisputable evidence of the negative effects which Salmon Farms have on our wild salmon and seatrout.

Please find my submission attached.

Yours sincerely,

[redacted]

Deenish Island Salmon Farm Submission

Minister For Agriculture Food and The Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre,
Clogheen,
Clonakilty,
Co. Cork.

Dear Minister,

Please accept this submission asking the minister not to renew the aquaculture licence T06/202 operated by Silver Kings Limited / MOWI at Deenish County Kerry.

there is undisputable evidence that the Salmon Farm in Deenish and others farms operated by MOWI have been repeatedly overstocked in direct contravention of the conditions of their licence.

In the interest of preserving remaining stocks of wild salmon in the rivers South Kerry it is crucial that a precedent is not set which would allow salmon farming companies to ignore licence conditions.

There is extensive evidence published (Sheppard and Gargan 2017) that when sea lice numbers emanating from fish farms are at a ‘high’ level the impact on migrating salmon and sea-trout post smolts can be catastrophic and result in a reduction of almost 50% in the number of adult fish returning to local rivers.

The Marine Institute continues to point to a paper published by Jackson et al in order to refute the above findings. However, the Jackson paper’s findings have been questioned by numerous scientists throughout the world. Indeed a retired scientist who was Executive Director of the same Marine Institute stated in conversation with representatives of Galway Bay Against Salmon Cages said that in his opinion the Jackson paper could no longer be relied upon.

In relation to the above Deenish Licence, the impact of this salmon farm has been seen to have decimated the world famous Lough Currane sea trout fishery in Waterville which is over 10 km from the Deenish site.

Based on all of the above, I am requesting as both an angler and concerned citizen that you refuse to renew the licence for the Deenish site.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Monday 5 February 2024 18:02
**To:** FinfishPC
**Subject:** T06/202 xxxxxxxxxx

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I am lodging my submission to object to the application for a new license for this fish farm.

[redacted] Learning to fly fish from a very young age, I spent many happy evenings sea trout fishing with my late grandfather . My own children have also had this opportunity. Lough Currane is a fantastic biodiverse ecosystem where there are really special sea trout growing larger than sea trout any where else in the country. These magnificent fish have drawn visitors from all over the world to enjoy the skills of flyfishing, a pastime at one with nature a sustainable eco tourism outside in a pristine location on our beautiful western seaboard. [redacted]

But now this is about to be destroyed our environment our beautiful sea trout our business and a way of life that is integral to our local culture ,

I implore you to make the right decision and protect this this unique environment. Please do not grant a licence to this company . The fish farm is destructive to our ecosystems destructive to our local economy . Extremely destructive and detrimental to our unique sea trout. In a time when we must cherish and protect our fragile ecosystems it is beyond belief that granting a licence to this company would even be contimplated. Get your priorities right, do not bow to the savage strength of a multi million euro corporation. Show courage and stop this environmental disaster because if this license is granted there will be no going back and the wanten destruction of our sea trout will be ireversable. This loss of our seatrout will sit firmly in the hands of those who would grant the licence. Instead let your legacy be a decision that protects our seatrout and allows a pathway back for the recovery of our unique seatrout by not granting this licence. Yours sincerely

[redacted]

**From:** [redacted]
**Sent:** Monday 5 February 2024 18:55
**To:** FinfishPC
**Subject:** T06/202 xxxxxxxxxxxxx

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Hello, my name is [redacted] I write to you too implore you to refuse the licence for the fish farm at Dennish island
[redacted] lough Currane that at one time was the premier lake for sea Trout with over 90% of all specimen sea
Trout caught in Ireland have been caught on the Currane system .Since the fish farm opened in 1990 it caused the catastrophic collapse of our sea trout fishing with a vast increase in sea lice numbers. Any year no salmon were in the fish farm an increase in sea trout catches is evident. This proves that if you take the right decision our unique sea trout will recover and once again, we can welcome back our visiting anglers that travel from all over the world with the hope of catching one of Currane's unique specimen Trout. I myself enjoy fishing with my wife and our sons, It frightens me to think that a decision made by our government today could rob future generations of enjoying our fishing, I implore you to make the right choice for our country and do everything possible to protect our unique sea Trout and our most magnificent environment please o please ensure that you don't make a mistake that could destroy our sea Trout .
Fish farming can be safely conducted on land, it is proven that open caged salmon farming at sea causes the destruction of sea trout fishing due to increase in sea lice and disease not to mention the risk of escaped fish entering our system, please make your decision with the future of our children in your mind so that they can enjoy catching sea Trout and even possibly a specimen and not having to listen to stories of how we left a Norwegian company make huge profits and destroy our fishing all because we couldn't be forward thinking and make the right decisions. Regards [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Monday 5 February 2024 19:03
**To:** FinfishPC
**Subject:** T06/202 xxxxxxxxxxx

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A chara,

I refer to the above proposal and hereby wish to make the following observation concerning the Appropriate Assessment and/or the Aquaculture and Foreshore Application.

The impact of sea lice Lepeophtheirus salmonis and Caligus elongatus on both on salmon and sea trout and specifically Caligus at this offshore site as it is high in salinity. Sea lice infestations on farms have a direct impact on local transiting salmon and sea trout populations through disease transfer via secondary infection, poor swimming ability thus heightening predator interaction, premature return by seatrout to freshwater to lose lice infestation. This leads to poor feeding ability resulting in poor body condition of salmon and sea trout that survive. This factor has a knock-on effect through reduced deposition of ova. The decline in seatrout populations in the Currane system has been dramatic and cant be denied.

The Cummeragh is an SAC as it supports the rare Pearl Mussel, reduced salmon and sea trout populations will result in less hosts for the pearl mussel in this part of its life cycle and affect the viability of this protected species. Mussels depend on juvenile salmonids to distribute juvenile mussels.

It is on record that Amoebic Gill Disease, which associated with open pen salmon farms, has reached epidemic proportions at Deenish as well as other sites. This can easily be passed on to wild salmonids given the proposed concentrations of farmed fish.

Escapees from farms are also a major concern and their capacity to reduce the genetic fitness of wild salmon.

I have serious welfare concerns given the extremely high mortality figures approaching 46% recorded at Deenish. Climate change with increased temperature fuels the invasion of jellyfish,

harmful algal blooms and also accelerates sea lice production. There is no place for open cage farming.

It is my opinion that the precautionary principal must be followed under EU Habitats Directive.

Regardless of the recorded differing opinions on the impact of sea lice between the Marine Institute and the IFI, any uncertainty in the science should result in a licence being refused.

Lough Currane as a recreational angling destination has faded significantly and if it is to have any chance to reverse the obvious loss of income to the area then it is important for tourism that the lake's wild fish stocks be protected and restored so that visiting anglers and their families staying in the area from March to October anually can be retained.

Sea trout stocks have seen a dramatic drop since the 1990 opening of Denish salmon farm. High levels of sea lice has been recorded on sea trout sampled, stocks have never recovered to levels prior to salmon farming becoming established.

In 2006 which was the first year that no salmon farms operated in the Kenmare Bay area a large increase in finnock numbers was recorded as well as much improved sea trout catches in 2006 and 2007.

Since 2011 there has been a radical decline of all age groups of sea trout with a virtual disappearance of spawning stock. This period coincided with high levels of production at Deenish and Inishfarnard. Up to 500,000 fish. As the local bays are never left fallow then there are sea lice from both Deenish and/or Inishfarnard 12 months a year.

Sea Trout are very impacted by lice and indeed disease from farms as they spend long periods of time in near coastal region.

The proposed new application will see large increase in stocking at Deenish and will effectively end the Lough Currane Sea trout population.

This proposal is not acceptable for all of the above reasons outlined, i feel that its granting will inevitably lead to European Court Of Justice Action and resultant costs to the exchequer. There should be no open cage farming allowed off of our coasts, new technology exists to move salmon farming to land based systems as has been done in other parts of the world.

[redacted]

Angler and Environmentalist.


Virus-free.www.avg.com

From: [redacted]
Sent: Monday, February 5, 2024 7:22 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Wild salmon and seatrout stocks

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> Dear Minister,
>
> I am emailing to ask that you don't renew the salmon farm licence Mowi on any of our Sea waters. It is proven that these farms are destroying our wild salmon and seatrout stocks with lice and many other issues. The farm in off Waterville in Kerry is a prime example, with the lakes and rivers have been decimated over the past few years.
> This is extremely serious and I would ask if you could review this and at least move them to in land before it is too late.
>
> Kind regards,
>
> [redacted]
>
> Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 5 February 2024 22:25
**To:** FinfishPC
**Subject:** Deenish licence Ref:T06/202

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The Mininster

The MOWI Deenish licence Ref:T06/202 was revoked in 2019 by former Minister for Agriculture, Food and the Marine Michael Creed for overstocking by 121%. Minister if you exceed to this renewal application and grant renewal of the said licence then you will be saying that the former Minister and his/your department were wrong in revoking the licence and set a dangerous precedent for future licence infringement cases. You will also be rewarding MOWI for breaking the conditions of their licence.

This salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA so the EU Habitats Directive Precautionary Principles must be applied and the renewal application refused.

I have lived in Norway and have seen the devastation salmon farms have done to wild fish populations. I do not want this plague visited on our waters.

Kindest regards

[redacted]

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 00:04
**To:** FinfishPC
**Subject:** Objection to MOWI License Application

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A chara,

The MOWI Deenish licence Ref:T06/202 was revoked in 2019 by former Minister for Agriculture, Food and the Marine Michael Creed for overstocking by 121%. Minister if you exceed to this renewal application and grant renewal of the said licence then you will be saying that the former Minister and his/your department were wrong in revoking the licence and set a dangerous precedent for future licence infringement cases. You will also be rewarding MOWI for breaking the conditions of their licence. This salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA so the EU Habitats Directive Precautionary Principles must be applied and the renewal application refused.

Le meas,

[redacted]

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 08:57
**To:** FinfishPC
**Subject:** Deenish Island - Salmon Watch Ireland Submission T06/202
**Attachments:** 060224 Deenish submission - Salmon Watch Ireland.pdf

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A Chara,
Please find attached submission from Salmon Watch Ireland regarding the application for renewal and review of licence T06/202.
Please acknowledge receipt.

Kind regards
[redacted]

[redacted]
Director
Salmon Watch Ireland
https://salmonwatchireland.ie
info@salmonwatchireland.ie
Phone [redacted]

Salmon Watch Ireland
Website: https://salmonwatchireland.ie
Email: info@salmonwatchireland.ie

SALMON WATCH IRELAND
"Dedicated to the restoration of salmon abundance in Ireland"

# Renewal and Review of Marine Finfish Aquaculture Licence at

# Deenish Island, Co. Kerry

# Licence Site Ref: T6/202

Dear Minister,

Salmon Watch Ireland contends that the Department of Agriculture, Food and the Marine (DAFM) should not determine this renewal and review of the above mentioned licence until the determination by the Aquaculture Licence Appeal Board is finalised (if indeed ALAB has jurisdiction) in regard to the decision by the Minister for Agriculture, Food and the Marine to discontinue the entitlement to continue Aquaculture Operations under the provisions of S19(a)4 of the Fisheries Amendment Act 1997 at this site issued in April 2019.

We also hold that the original application for renewal of the licence in 2007 would be published to bring clarity to its legality and whether this application is withdrawn or has been determined by the Minister. DAFM should also provide clarification as to whether they consider it legally appropriate to accept a renewal or a review of an expired licence where an original renewal application has not been determined.

We strongly contend that an expired licence cannot be amended under Section 19(a)4 even though amendments have been granted by ALAB and indeed DAFM over a number of years.

## 1. Introduction

The documentation submitted by, Silver King Seafoods Ltd , trading as MOWI Ireland, seeking a renewal and review of licence T6/202 for an open cage salmon farm to be sited at Deenish Island falls far short of what is required pursuant to Article 6(3) of the Habitats Directive. Nor can there be reliance on Article 6 (4) thereof, as there are no stated 'imperative reasons of overriding public interest', (IROPI), which could justify continuation and / or expansion at the Deenish site.

The site is within close proximity to many important salmonid rivers which are ecologically sensitive to any disturbance. It should also be noted that angling tourism in the Waterville



Salmon Watch Ireland
Jerpoint Hill
Thomastown
County Kilkenny

Salmon Watch Ireland
Website: https://salmonwatchireland.ie
Email: info@salmonwatchireland.ie

catchment has in the past been a substantial driver of economic activity in the localised and regional economy.

This economic importance has been systematically eroded caused principally by salmon farming activities in Kenmare Bay and Ballinskelligs Bay. These farms have caused a significant reduction of wild salmon stocks and the virtual extinction of sea trout stocks.

The unique genetic strain of sea trout and their size and numbers has in the past brought many angling tourists from all areas of Ireland, UK and internationally and has been the bedrock of the local economy from April to October.

The absolute crash in sea trout stocks coincided with the reopening of the Deenish and Inishfarnard sites and indeed the enormous overstocking of both sites carried out illegally by MOWI Ireland. The fish counter statistics and angling returns demonstrate a substantial decline since 2011 with the tourist angling industry now functionally extinct. This is certainly a collapse and is linked to these farms. This should be no surprise as without exception sea trout stocks have collapsed in every jurisdiction and area where salmon farming exists.

As the Marine Institute runs the salmonid index system at Burishoole in County Mayo it should come as no surprise that they have totally ignored their own census data concerning sea trout which have effectively been eradicated by salmon farming in Clew Bay[1]. This is nothing short of a disgraceful abandonment of their duty to protect wild salmonids and certainly we do not have any confidence in their repeated assertions concerning the impact of sea lice on wild salmonids. Angling tourism is a sustainable product which can be revitalised but only in the absence of open cage salmon farming in Kenmare Bay and Ballinskelligs Bay.

The Waterville catchment has become a “ghost lake” with little angling activity taking place and it is impossible to bypass the salmon farming issue as being the principal driver of the decline of wild salmonid stocks.

## 2. Past Failures of MOWI- Deenish Island

It is absolutely clear that MOWI has in the past ignored the operating conditions of their licence (Expired). This led to the Ministerial decision to discontinue aquaculture at the site. This is still under consideration by ALAB.

However, it is essential to lay out the various anomalies and transgressions associated with this site.

- In October 2012 MOWI were granted a temporary amendment after an appeal process to ALAB which allowed the stocking of 800,000 smolts instead of 400,000 for grow out at the Deenish site. In spring 2013 MOWI stocked the site with 838,000 smolts (Excess of 38K) on site for grow out until late 2014 early 2015. The temporary

[1] Newport Annual Report Page 2021, Page 28 https://drive.google.com/file/d/1l5-HFewsA7IEagjKKQiLsjLTXaYy9297/view?usp=sharing



Salmon Watch Ireland
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amendment to the existing licence was of two years duration ending at end of March in 2015.

- A High Court judicial review in 2015 of the licencing of the Deenish Island site contained an affidavit from MOWI which mentions 800,000 smolts stocked in 2013. It also contains a deliberate attempt to give the impression that the existing licence allowed 400,000 smolts to be stocked every year. This yearly or annual stocking of 400,000 smolts is not contained in the licence and was a deliberate attempt to mislead.
- In their submission to ALAB regarding their Appeal against the notice of Ministerial decision of the Minister for Agriculture, Food and the Marine under the Provisions of Section 68(1) and Section 19(a)4 of the Fisheries (Amendment) Act 1997 , MOWI admitted that they requested an amendment to continue the trial licence or have a more permanent amendment ***"Mowi Ireland requested to repeat this trial or have a more permanent amendment ("the trial" having proven that there were no adverse environmental effects), also in respect of the sister site at Inishfarnard, but these requests were rejected out of hand by the Department."*** It is evident that MOWI were aware that their request was rejected but continued to operate as they wished thus undermining the licence conditions and regulatory powers of the Irish State. This illustrates the abject disrespect by MOWI for Ireland and its laws.
- The Marine Engineering Division ('MED') file shows that stocking records provided by MOWI (following an engineering inspection of the site by MED) reported the stock on site in January 2015 to be 222,999 juveniles @ 40 g average weight. MOWI also reported that there were 738,458 fish with an average weight of 0.339kg in the site at the end of May 2015. The Marine Engineering inspection took place in July 2015[2]
- Aquafact (who are contracted by MOWI to undertake benthic inspections of their sites) noted in the Benthic Report of 2015 that, between 23rd January 2015 and 15th March 2015, 87.84 tonnes of salmon were inputted to the site. There is no mention of the December 14 input as specified in Marine Institute records.[3]
- The 222,999 juveniles (Average Weight 40g) mentioned in the MED report of 2015 are absent from the records released by the Marine Institute.
- In 2017 Mowi again stocked 560,000 smolts (Licensed input 400,000 smolts). This figure was ascertained by release of documents by the Marine Institute and is contained at following link.[4]
- According to reports released to Salmon Watch Ireland the stocking of smolts in 2019 [5]amounted to circa 507,119 which are not consistent with condition 2(d) of their existing licence. This is an overstocking by over 107,119 fish or approximately 27% over the maximum permitted under the licence. Salmon Watch Ireland would also

[2] Records released by DAFM - **Marine Engineering Report 2015**
[3] Aquafact Benthic Reports - **Aquafact Report 2015**
[4] Fish Movement to Deenish 2017
[5] Records released by Marine Institute - **Marine Institute Released Movements Deenish.**



Salmon Watch Ireland
Jerpoint Hill
Thomastown
County Kilkenny

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Website: https://salmonwatchireland.ie
Email: info@salmonwatchireland.ie

reiterate that stocking on an annual basis is not mentioned or contained in the conditions attached to the licence.

- There would have been a significant increase in effluent from the farm from 2013 onwards. 838k (Licence 800K) smolts were stocked in 2013, circa 787K smolts (87.84 Tonnes) (Licence 400K) in 2015, 560 K (Licence 400 k) in 2017. These figures for stocking are outside the licence conditions. The trial licence was also overstocked by upwards of 38 K fish (High Court affidavit mentions 800 K). It is obvious that increased stocking of the site by such a large degree would certainly have increased organic materials emanating from the site. The interpretation by MOWI that effluent emanating from the physical process of harvesting was the reason that condition 2(e) was contained in original licence cannot be substantiated.
- There has been a concerted campaign of non-cooperation by MOWI in their dealings with the Department of Agriculture, Food and Marine in relation to the following licence condition.
- **"Aquaculture Licence – substitution for condition 2(1) of the following condition: The Licensee shall co-operate in the audit from time to time of its aquaculture operations and licensed area and facilities and premises in accordance with the detailed specifications of the Department of Communications, Marine and Natural Resources (Monitoring Protocol No. 4 for Offshore Finfish Farms – Audit of Operations, as may be revised from time to time)**
- The Marine Engineering Reports for Deenish Island note non-compliance with stocking rates and non-disclosure of standing stock. It is noted that operators of the site refused to disclose stock on site to inspectors thus breaching the terms and conditions of their licence. It is obvious that on-site personnel were instructed to refuse these stocking figures to frustrate compliance and audit activities of the Department. [6]

## 3. Natura Sites

The Deenish farm site is located within the Kenmare Bay SAC (002158) and the farm is also located within the confines of the Deenish Island and Scariff Island SPA (004175)

Adjacent SACs include the Blackwater River (Kerry) SAC (IE0002173), Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC (IE0000365) Ballinskelligs Bay and Inny Estuary SAC, (000335) and the Glanmore Bog SAC (001879)

The qualifying interests of two of these SAC's include both wild Atlantic salmon, *Salmo salar* and Pearl Mussel, *Margaritifera margaritifera.* The two SACs in question are the Blackwater River (Kerry) SAC (IE0002173), Killarney National Park, Macgillycuddy's Reeks and Caragh

[6] Marine Engineering Reports



Salmon Watch Ireland
Jerpoint Hill
Thomastown
County Kilkenny

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Email: info@salmonwatchireland.ie

River Catchment SAC (IE0000365). The Glanmore Bog SAC qualifying interests includes *Margaritifera margaritifera.*

In regard to wild salmon the rivers with a hydrological connection to these sites include the following designated salmon rivers, Sneem River, Owreagh, Kerry Blackwater and the Waterville or Currane catchment. However, there are other rivers and smaller catchments which may be affected by the Deenish site which also enjoy the protection status for wild salmon as a consequence of a hydrological connection to the above-mentioned SAC's but are not designated as salmon rivers. These include the following, Staigue, Bunnow and Coomnahorna and other lesser numerous streams on Northwest shore of Kenmare Bay which may be impacted by the farm at Deenish. These smaller catchments are unassessed but, in all probability, support small unique and vulnerable stocks of Atlantic salmon. It is important to note that the Kerry Blackwater has not met its conservation limit in any year since 2012 but is marginally above conservation limit for 2024 (Surplus of 38 fish), and the Owreagh has not been deemed to be attaining its conservation limit since 2007 and thus both are extremely vulnerable to continued or further deterioration from sea lice or disease emanating from Deenish or from a combination of other farms operating in Kenmare Bay. Another catchment which is a designated salmon river is Lough Fadda which has also a hydrological connection to the Glanmore Bog SAC. This catchment is deemed not to be attaining its conservation limit for Atlantic salmon.

In regard to *Margaritifera margaritifera* it is evident that activities at Deenish will have a significant effect on the internationally important populations contained within the Currane system and Kerry Blackwater by reducing salmonid juvenile populations as a consequence of sea lice and disease vectors thereby reducing viability of mussel populations. It is also important to note that other smaller catchments bordering Kenmare Bay have extant populations of *Margaritifera margaritifera* including the Owreagh Bunnow, Sneem, Tahilla, Finnihy, Sheen, Roughty, Owenshagh, and Dromoghty

The Glanmore Bog SAC (001879) has *Margaritifera margaritifera* as a qualifying interest and it is noteworthy that the two of the rivers which flows through this SAC are unassessed for their salmonid stocks. Another as mentioned above, Lough Fadda has a hydrological connection to this SAC. Any continuing or further impact from sea lice or disease will certainly reduce adult salmonid returns thus directly affecting juvenile salmon and trout numbers within the SAC with consequent erosion of mussel populations. The absolute necessity to have anadromous trout stocks as a requirement is aptly described in the following paper which describes anadromous females as the drivers of juvenile density. [7]

[7] A small number of anadromous females drive reproduction in a brown trout (Salmo trutta) population in an English chalk stream. https://onlinelibrary.wiley.com/doi/full/10.1111/fwb.12768



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The limited assessment of these catchments is entirely unsatisfactory and does not conform to what is required pursuant to Article 6(3) of the Habitats Directive.

There has been an effort by the Marine Institute on occasions to suggest that brown trout juveniles would be able to fill any shortfall in salmon numbers or shortfall of anadromous trout in catchments. There is no scientific basis or study for this contention and thus should be discounted.

## 4. Sea Lice

It is clear that there is a substantial conflict between Inland Fisheries Ireland and the Marine Institute[8] in regard to the impact of sea lice on wild Atlantic salmon and sea trout. The legal basis of the precautionary principal and case law is as follows.

***"The precautionary principle is an approach to risk management, where, if it is possible that a given policy or action might cause harm to the public or the environment and if there is still no scientific agreement on the issue, the policy or action in question should not be carried out."***[9]

It is evident that this specifically applies and is acknowledged in the NIS documents as supplied by MOWI.

As discussed above there are a large number of catchments which have a hydrological connectivity with the two SAC's which have *Salmo salar* as a qualifying interest.

The modelling of dispersal of sea lice from Deenish as submitted by MOWI is certainly flawed as the following study carried out by the Marine Institute[10] and **MOWI** demonstrated substantially different outcomes. The study demonstrates a radically different outcome and the modelling presented in the NIS as submitted by MOWI should be viewed as unreliable and misleading.
It should be noted that the Marine Institute study is a physical study rather that a computer-generated study.

The Deenish site has two conditions attached to the original expired licence which affect sea trout stocks specifically and we wish to expand on the necessity that both conditions are examined in the light of the absolute collapse of sea trout stocks in Lough Currane and indeed throughout the catchments flowing into Kenmare Bay and Ballinskelligs Bay. These conditions are:

***"This licence will remain subject to ongoing review in light of continued monitoring of, and research into, the two marine sites and neighbouring sea trout fisheries which may be undertaken by the Salmon Research Agency and/or the Fisheries Research Centre."***

[8] Correspondence Minister Eamonn Ryan and Reply by Minister Charlie Mc Conologue https://drive.google.com/file/d/1XPpqoROj6iwwd0SHE8c5Wddz1q72EfrL/view?usp=sharing
[9] Precautionary Principal - https://eur-lex.europa.eu/EN/legal-content/glossary/precautionary-principle.html#:~:text=The%20precautionary%20principle%20is%20an,should%20not%20be%20carried%20out.
[10] Marine Institute Aqua Plan - https://drive.google.com/file/d/1GtbIvtDyFksK6pGd-zYQw5iBwvsV5y38/view?usp=sharing



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***"In the event of proven contra-indications for sea trout stocks causatively linked to the fish farming operations permitted under this licence, the Minister may exercise his discretion to take any necessary protective measures ranging from reduction in permitted production levels to revocation of the licence and harvesting of all stock."***

We would also like to draw your attention to the following scientific papers which reflect damage to sea trout stocks with specific detailed references to Kenmare Bay rivers and the Waterville system. It should be noted that these studies were carried out when production levels were substantially lower than they are in modern times.

It is also noteworthy that the premise in the NIS that copepod lice have to reach nearby estuarine waters to infect wild salmon and sea trout is entirely without foundation and does not consider the movement of juvenile salmon and sea trout smolts during migration.

The first study relates to a paper published in 2017 [11]which demonstrates the different infestation pressures between areas where salmon farms are present and farms which are over 30km from salmonid rivers.

The second study is ***" The Relationship Between Sea Lice Infestation, Sea Lice Production and Sea Trout Survival in Ireland, 1992-2001."***[12]

A paragraph from this study adequately demonstrates the link between salmon farms and proximity to sea trout catchments.
***"It is clear from the data presented that there is a strong relationship between high infestation of juvenile lice stages on sea trout and proximity to salmon farms and the patterns of infestation and infestation levels change markedly beyond about 25-30 km from salmon farms. There is also a decrease in risk of osmoregulatory imbalance and mortality from sea lice infection at distances greater than 25-30 km from farms. From these relationships we therefore conclude that sea lice from marine salmon farms were a major contributory factor in the sea trout stock collapses observed in salmon aquaculture areas in western Ireland, western Scotland, and western Norway."***

The distance of 30 km is relevant in the context of Deenish Island as it encompasses the Waterville catchment, Sneem catchment and considering the narrowness of Kenmare Bay and the location of Inishfarnard it is more than probable that elevated levels of infestation will occur on fish migrating from the Kerry Blackwater.

It is also probable that smaller catchments which may depend on sea trout to produce the necessary density of juvenile trout to host *Margaritifera margaritifera* glocidia are at substantial risk of extinction if indeed it has not taken place already. It is evident that there has

[11] 2017 Report Sea Trout Symposium -https://drive.google.com/file/d/19PeLini6w6opCL9uZlYXW2Ne7aeKzT_c/view?usp=sharing
[12] The Relationship Between Sea Lice Infestation, Sea Lice Production and Sea Trout Survival in Ireland, 1992-2001. https://onlinelibrary.wiley.com/doi/10.1002/9780470995495.ch10



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been no study to determine whether Atlantic salmon or sea trout progeny are the dominant host in the various catchments mentioned in the NIS or indeed some of the larger catchments including the Cummeragh or Coppal rivers within the Lough Currane catchment. This is not satisfactory and falls well short of the accepted level of investigation required pursuant to Article 6(3) of the Habitats Directive.

In regard to evidence of premature returning sea trout post smolts, we have secured footage on two dates which demonstrate high infestation pressure in the Waterville Catchment and the Kerry Blackwater. The Waterville catchment video is from June 2017[13] and demonstrates elevated levels of juvenile lice on premature returning sea trout. The second video is from Kerry Blackwater[14] in June 2021 which demonstrates a high level of infestation by juvenile and adult lice.

It is important to note that sea lice levels on Deenish and Inishfarnard are reported as low during these periods and below trigger levels. We contend that the trigger levels, as set out in the sea lice monitoring protocol, are arbitrary and have no basis in science and there is essentially no proof that the trigger levels or indeed lower levels of lice on farms result in no increase in normal background levels within bays.

We also contend that the sites in Kenmare Bay are marine in nature with high salinity and are affected by *Caligus elongatus* and *Lepeophtheirus salmonis.* It is essential that the impact of *Caligus elongatus* is included in the NIS submitted by MOWI. It is evident that this particular species can be dominant in full marine conditions and may be particularly harmful to migrating salmon and sea trout smolts.

There are a number of separate migration patterns in the sea trout stock in Waterville. One occurs in the spring with sea trout smolts migrating predominantly in April and May and post spawned sea trout adults also going to sea in early spring. There is a separate migration of non-maturing trout in the autumn which can also be affected by sea lice emanating from Deenish and other farms in Kenmare Bay.

It must be stressed that the presence of large numbers of farmed salmon in farms in Kenmare Bay result in a situation whereby they become a strong vector for the production and spread of both species of sea lice.

While sea trout are not a protected species under the Habitats Directive, they may have a significant role in protecting the life cycle of *Margaritifera margaritifera, (Pearl Mussel).* The rivers within the Killarney, Macgillycuddy's Reeks and Caragh SAC and the Blackwater River (Kerry SAC) and Glanmore Bog SAC have large population of mussels which are listed as a qualifying interest. The Currane catchment is one of eight priority catchments[15]nationally for important populations of very endangered freshwater pearl mussels. However, the population is of poor conservation status and its viability will be further threatened by impacting it's

[13] Waterville June 2017 Video - https://drive.google.com/file/d/0B3onXoqc0rJtbE42dUhTV3dLcmM/view?usp=sharing&resourcekey=0-Nr2ThD8rsvNdpUE-sxNCvg
[14] Kerry Blackwater Video - https://drive.google.com/file/d/1nKsER0D-pRxNHzWyJvZoCp1u_Z_sLEcT/view?usp=sharing

[15]Pearl Mussel Project https://www.pearlmusselproject.ie/catchments-approach/



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glochidial host – juvenile migratory salmonids. As mentioned before a large number of these rivers will be affected by sea lice impact on migrating salmonids. Consequently the 'indirect effect' of these salmon farms, including T06/202, is having a detrimental effect on FPM populations and abundance, which has not been capable of assessment or quantification'.

As mentioned in the introduction the absolute crash in sea trout stocks coincided with the reopening of the Deenish and Inishfarnard sites and indeed the enormous overstocking of both sites carried out illegally by MOWI Ireland. The fish counter statistics and angling returns demonstrate a substantial decline since 2011 with the tourist angling industry now functionally extinct. This is certainly a collapse and is linked to these farms. This should be no surprise as without exception sea trout stocks have collapsed in every jurisdiction and area where salmon farming exists. As the Marine Institute runs the salmonid index system at Burishoole in County Mayo it should come as no surprise that they have totally ignored their own census data concerning sea trout which have effectively been eradicated by salmon farming in Clew Bay[16]. This is nothing short of a disgraceful abandonment of their duty to protect wild salmonids and certainly we do not have any confidence in their repeated assertions concerning the impact of sea lice on wild salmonids.

In regard to wild salmon, we are not satisfied with the level of scrutiny of peer reviewed material concerning the impact of sea lice on wild salmon. While the NIS does discuss the different interpretation of data, it totally ignores the effect on returning adults. We have prepared a document which outlines the various peer reviewed papers concerning the impact of sea lice on adult salmon returns[17]

The European Court of Justice (ECJ) in several judgments[18] have ruled that the test to be applied must be based on the 'best available scientific knowledge in the field.' We take issue, therefore, with the failure of the application to have regard to independent peer reviewed scientific reports which challenge the conclusions of the small and select number of reports which are the only ones that have been consistently considered by DAFM.

It is unacceptable that the Natura Impact Assessment as presented ignores the ECJ jurisprudence and only considers a narrow range and indeed interpretation of scientific literature concerning the impact of sea lice from salmon farms on wild salmonids.

Assessment of applications for grants of licences, and grants of renewal of licences, by the Minister for Agriculture Food and the Marine, have in the past relied exclusively on a limited number of scientific papers from the Marine Institute [19] in respect of sea lice impacts on wild salmonids in the marine setting.

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[16] Newport Annual Report Page 2021, Page 28 https://drive.google.com/file/d/1l5-HFewsA7IEagjKKQiLsjLTXaYy9297/view?usp=sharing
[17] Salmon Loss Calculation Adult Returns https://docs.google.com/spreadsheets/d/1EuepvI1wJKDoGUFFd-vKzgr4APL2q8-B/edit?usp=sharing&rtpof=true&sd=true
[18] Court of Justice of the European Union (CJEU):
C-258/11 - Sweetman and Others v ABP (Galway Bypass)
C-258/11 - AG opinion, Sweetman and Others v ABP (Galway Bypass)
C-127/02 - Waddenzee
C-521/12 - T.C. Briels and Others v Minister van Infrastructuur en Milieu
C-323/17 - People Over Wind and Sweetman v. Coilte Teoranta
[19] Jackson et al. 2013. Impact of Lepeophtheirus salmonis infestations on migrating Atlantic salmon, Salmo salar L., smolts at eight locations in Ireland with an analysis of lice-induced marine mortality.



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Salmon Watch Ireland strongly asserts that DAFM must consider the application by MOWI as flawed and thus not in compliance with Article 6 subsections (3) and (4) of the Habitats Directive.

The Jackson *et al*, studies have been relied upon by MOWI in their NIS associated with this application and are once again at considerable variance with both national and international studies in relation to the impact of salmon farming and the impacts of sea lice emanating from these farms on wild salmonid stocks. The Marine Institute papers imply falsely in their interpretation that the impact of sea lice emanating from salmon farms are a minor and irregular component of wild salmon survival. This has been relied upon by MOWI in this application to minimize the effects caused by salmon farming.

While other peer reviewed papers concerning sea lice appear in the NIS it is obvious that a bias is towards the Marine Institute papers and that the Competent Authority in its examination of same is not independent in this matter as the resources of the Marine Institute were utililised to carry out the Jackson studies. Salmon Watch Ireland strongly suggests that an independent review be considered to examine the studies carried out by Jackson which have already been widely dismissed as defective[20]. Simply put there is an impact on vulnerable salmon stocks and to licence open cage farming is effectively ignoring the inevitable outcome of this practice, less adult returns.

It is alarming to note the dependence of MOWI on sea lice treatments and the use of cleaner fish to mitigate the effects of sea lice on wild salmon as the studies concerning impacts were carried out while mitigation was in place. As mentioned previously we reiterate that trigger levels for treatment are arbitrary and have no scientific basis to suggest that background natural levels are maintained in the presence of salmon farms.

It is essential to note that there is a substantial difference in impact aligned with biomass, period fish are in farms and environmental conditions. There are significant differences in impacts if farms in bays are recently stocked with smolts during spring, grower fish in second year of production and bays that are fallowed. The situation in Kenmare Bay presently has fish in second year of production at all times in that Deenish or Inishfarnard are in production in alternate years. There is no whole-bay fallowing and there is a consistent source of sea lice larval distribution 12 months per year.

The impacts are readily recognisable from Passive Integrated Transponder (PIT) studies carried out by Inland Fisheries Ireland on the Erriff river in County Mayo. [21] These studies clearly

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https://oar.marine.ie/bitstream/handle/10793/849/Impact%20of%20Lepeophtheirus%20Salmonis%20on%20Migrating%20Atlantic%20Salmon%20(Jackson,%20D.%20et%20al.).pdf?sequence=1

3 Jackson et al. 2011. An evaluation of the impact of early infestation with the salmon louse Lepeophtheirus salmonis on the subsequent survival of outwardly migrating Atlantic salmon, Salmo salar L., smolts. https://www.sciencedirect.com/science/article/pii/S004484861100247X

[20] 4 M Krkosek et al. (2013) Comment on Jackson et al. 'Impact of Lepeophtheirus salmonis infestations on migrating Atlantic salmon, Salmo salar L., smolts at eight locations in Ireland with an analysis of lice-induced marine mortality' https://drive.google.com/file/d/1TtsD1Ra3R7bczcNtJZ2IMT6LS3BUpD1G/view?usp=sharing

[21] Inland Fisheries Ireland Annual Report Page 96/97 https://drive.google.com/file/d/15VACohitPK9vjm-tSAhj9GOzXm1eBL94/view?usp=sharing



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demonstrate that there is a substantial effect on salmon and sea trout survival and all times but is substantially greater when farms are in second year of production.

The following peer reviewed papers although not exhaustive demonstrate the impact of sea lice on wild salmon and must be considered in order to comply with the standards required what is required pursuant to Article 6(3) of the Habitats Directive. [22]

## 5. Amoebic Gill Disease

This disease has become established in all farming areas and is a direct threat to wild salmonid stocks. It is noteworthy that the Marine Institute has chosen to alert NASCO in the NASCO Implementation Plan for the period 2019-2024 EU – Ireland (Revised version submitted November 2021)[23] to the fact that wild salmon smolts may become infected on their migration through areas with infected salmon farms.

There would also be a considerable threat to sea trout. The Marine institute notes that the "threat of these diseases to wild salmon is unknown at present" thereby introducing scientific doubt.

It is also a concern that sea trout also may become infected during their smolt migration both in spring and autumn. The farms at Deenish and Inishfarnard are particularly affected by AGD and thus act as a reservoir to increase exponentially the causative agent.

The failure to analyse the impact of outbreaks of AGD on wild salmonids is certainly not in compliance with the provisions of required pursuant to Article 6(3) of the Habitats Directive.

These outbreaks and the potential of rapid increases in the causative agent as a consequence of farm induced exponential growth cannot be discounted. This is a very real issue and has not been adequately researched.

The following paper illustrates the difference between the mortality rate between farmed salmon smolts, farmed / wild hybrids smolts and wild smolts. It is apparent that wild salmon smolts suffer much greater mortality than the other categories.[24]

## 6. Escapees

The issue of farmed salmon escape is poorly evaluated in the NIS. Escapes of farmed fish into rivers with small wild stocks can have a significant effect. This trickle effect is certainly problematic as there are many rivers in the vicinity which may have small populations with distinct genetic attributes which would be compromised.

[22] Scientific Papers Sea Lice https://drive.google.com/drive/folders/14pkmp_eiA4zA_yE-_w1wXrXJCyWdPQNr?usp=sharing

[23] Implementation Plan Ireland NASCO Page 25 https://nasco.int/wp-content/uploads/2021/11/IP1915rev2_Revised-Implementation-Plan_EU-Ireland.pdf

[24] Links between host genetics, metabolism, gut microbiome and amoebic gill disease (AGD) in Atlantic salmon https://animalmicrobiome.biomedcentral.com/articles/10.1186/s42523-022-00203-x



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It is also noteworthy that a Marine Institute[25] paper has strongly noted the negative impact of escapees on wild stocks. Escaped farmed salmon have been observed sporadically in the Kenmare Bay area and captured by anglers.

The prospect of genetic introgression between farmed and wild populations gives rise to lower survival amongst the mutant strain progeny with lower marine survival.

It is agreed that salmon which are mature or near to maturation pose the most significant risk, but a scenario whereby escapes occur on a large scale cannot be ruled out as climatic influences become more problematic in regard to damage to infrastructure, particularly in winter.

The scenario whereby large escapes are described as problematic (thousands) is not considering the wild spawning stocks of the various rivers in and around Kenmare Bay. The number of wild salmon spawning is many multitudes lower than even a "minor" escape.

It is essential to realise that the farms presently operating in the environs of Kenmare Bay dwarf the total run of wild salmon back to Ireland by a factor of four. Thus, an escape of mature salmon numbering in hundreds could effectively overrun wild salmon populations in the Kerry Blackwater and Currane systems as well as numerous smaller catchments.

Introgression is a problem in salmon farming areas which has implications for both salmon populations and pearl mussel populations. Introgression studies should have been undertaken to provide an analysis of existence of introgression in the area and this failure to adequately address this issue demonstrates a further flaw in this application.

## 7. Benthic Studies

Salmon Watch Ireland contends strongly that benthic studies which are carried out annually are not a sufficient indicator especially in light of the location of this farm. Oceanic current and exposure to high winds at this site would certainly negate the results of the benthic studies due to underwater inspection sites being effectively located within a short distance of farms. Due to conditions at this site and the open coastal area, effluent and other materials can travel widely from this site and will certainly not be picked up by localised inspection.

It is also noted that the most recent Benthic Reports note that Deenish Island was in an unacceptable condition.[26]

It is our contention that the protocol is totally insufficient to examine wider impacts of salmon farms outside the allowable zone of impact.

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[25] Mcginnity, Philip & Stone, C. & Taggart, J. & Cooke, Declan & Cotter, Deirdre & Hynes, Rosaleen & McCamley, C. & Ferguson, Andrew. (1997). Genetic impact of escaped farmed Atlantic salmon (Salmo salar L.) on native populations: Use of DNA profiling to assess freshwater performance of wild, farmed, and hybrid progeny in a natural river environment. Ices Journal of Marine Science - ICES J MAR SCI. 54. 998-1008. 10.1016/S1054-3139(97)80004-5. m

[26] A Review of Benthic Monitoring at Irish Finfish Aquaculture Sites During 2021
https://drive.google.com/file/d/1e4w56uTw1sJIbC_rb_AVy48kVI5sylUI/view?usp=sharing



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## 8. Nutrient Pollution

In light of the study by the Marine Institute with MOWI (Marine Institute Aqua Plan ) at footnote [4] it would be difficult to reconcile with the modelling presented in the NIS. It is abundantly obvious that it is unreliable and frankly not believable. There is also a requirement to design and designate a mixing zone for Dissolved Inorganic Nitrogen (DIN) and is explicitly contained in Irish Legislation. SI 272 of 2009.

## 9. Consideration of Alternatives

There has been no attempt to integrate modern closed containment technologies in this application. The obvious reason for this is that economic considerations are being given precedence over environmental damage. It is obvious that this industry will not survive without innovation particularly in view of warming oceans. Open cage farming will not survive economically or environmentally.

## 10. Animal Welfare

The total mortality figures contained in the Aquaculture Stewardship Council (ASC) reports note exceptional rates of up to 45.8% on Deenish which obviously demonstrate a substantial animal welfare issue at the site.

***"For the previous crop (2015) the total input number was 828,286. Total mortalities were 393,417 or 45.8%."***[27]

While environmental challenges exist presently due to higher water temperatures it is abundantly clear that this will only get worse as climatic conditions deteriorate. Harmful algal blooms, sea lice and jellyfish infestation will only be amplified by declining marine conditions.

The total mortality figures reported by MOWI to ASC [28]were as follows: production cycle 2013 (36.4%), 2015 (45.8%), 2017 (23.9%) and 2019 (28.9%). This is well above the figures reported in Scotland and Norway.

Ireland is certainly not suitable for open cage farming at sea. The veracity of these figures may be questionable as they are self-reported and with obvious anomalies with stocking and harvest figures may in fact be understated. This is a substantial animal welfare issue and is highly suggestive that farming should not continue as a matter of public concern.

[27] Aquaculture Stewardship Council - https://drive.google.com/file/d/1-6Qw39sTc0WlXOb2dpDggqv7pTR_c9XS/view?usp=sharing Section 5.1.5

[28] Aquaculture Stewardship Council - https://asc-aqua.org/find-a-farm/ASC01362/



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These figures are under-reported in the application by MOWI.

## 11. Conclusion

Salmon Watch Ireland has expressed our views on this application in the light of the alarming collapse of both sea trout and salmon locally and nationally but also in regard to one of the few remaining areas where sustainable angling tourism could be revitalised while preserving economic activity in the area.

The fact that the licensee, MOWI, has been in constant significant breach of the terms of its licence at this site should be taken as indicating that such breaches will continue at this site, as well as at its other sites off the West Coast, if the licence is renewed.

A strong refusal for blatant contempt for the terms of the licence needs to be delivered to the licensee if the integrity of the licencing system is to be upheld.

In addition to the forgoing serious consideration must be given to the weight of scientific evidence of the impact of open cage salmon farming on the survival rates of migrating salmon and sea trout smolts and we contend therefore that the precautionary principle needs to be invoked in respect of the decision as to whether to renew the marine finfish aquaculture licence at this site. As outlined in this submission the Deenish Island site is in close proximity to a number of SAC's and this further underlines the imperative of invoking the precautionary principle.



Chair Salmon Watch Ireland

Salmon Watch Ireland
06 February 2024



Salmon Watch Ireland
Jerpoint Hill
Thomastown
County Kilkenny

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 09:03
**To:** FinfishPC
**Subject:** xxxxxxxxxxxxxxx

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To whom it concerns,

I would like to state my objections to the proposed fish farm at Deenish Island, off the coast of Kerry.

If this fish farm is allowed to go ahead it will have catastrophic effects on the local fishermen and the environment.

Salmon farming has already been taking place here and it has led to the degradation of the sea trout runs locally and the sea trout fishing in Lough Currane - once a fishery of international repute. The company involved in the salmon farming is MOWI and it is the world´s largest producer of Atlantic salmon. They have already overstocked at this site and broken the conditions of their licence.

Please act and protect Irelands marine environment and the livelihoods of the local fishermen.

Regards,

[redacted]

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 09:42
**To:** FinfishPC
**Subject:** ref T06 / 202

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Dear Minister, and whomever it concerns in the department,

I am writing to object to the planning application for the salmon farming licence at Deenish Island. Ref T06/202.

I am objecting for 3 reasons.

1. I am objecting to this as it is in a very sensitive salmonid habitat. The once world famous seatrout fishery of lough currane has been seriously damaged by this farm. It does not now exist as it once did and is now only fished by the odd hardy local. A booming tourist attraction has been lost. As yet no one seems to care about the loss of the tourist revenue to the area let alone the unique species of fish it holds. If we remove the fish farm from the area fisheries scientists are confident of a recovery.

2. Salmon farming is not sustainable, the chemicals needed to produce these salmon and the effluent these salmon produce themselves combine to form a huge amount of toxic waste that is put into our once pristine coastal waters. This can not go on without serious environmental damage taking place.

3. To take a cold hard financial look at this , it seems obvious that for a very small benefit (maybe a handful of local jobs) we are giving away all the tourism jobs such as fishing guides, accommodation providers , cafes , restaurants, craft producers etc. Most of the profit from this farm will leave Ireland and go to the parent company MOWI in Norway.

please do not grant this license and close this farm.

sincerely

[redacted]

Virus-free.www.avast.com

From: [redacted]
Sent: Tuesday, February 6, 2024 10:58 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Lough Currane and fish farm

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I would like to express my strong objection to the proposed renewal of the fish farm licence at Deenish Island. Salmon and sea trout are adversely affected by the presence of such farms and given that present stock levels are of concern, it seems an illogical move to renew such a licence. The science is clear on this and is accepted across the scientific community.
However, if they wish to pursue a solely land based system then I would have no objection.
[redacted]

Sent from my iPhone

From: [redacted]
Sent: Tuesday, February 6, 2024 12:25 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to return of Salmon Farm

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This is an objection to the reopening of the salmon farm.
Continuing to attempt this venture will most certainly harm the local ecosystem with the return of sea lice an decimation of the local fish population.
Thank you for your consideration,
[redacted]

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 12:45
**To:** FinfishPC
**Subject:** Fwd: GBASC Submission re MOWI Licence T06/202 Renewal application.
**Attachments:** MOWI Stock Market Preleiminary Report..jpg; Deenish ASC certification cancelled..jpg; Inishfarnard, Deenish ASC certification cancelled..jpg; Threats to sea trout in Norway.pdf

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Minister for Agriculture, food and the Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre, Clogheen,
Clonakilty, Co. Cork.

SUBMISSION FROM GALWAY BAY AGAINST SALMON CAGES RE RENEWAL OF MOWI MARINE FINFISH AQUACULTURE LICENCE AT DEENISH ISLAND, CO. KERRY.

LICENCE SITE Ref: T06/202

Dear Minister McConalogue,

Minister, as MOWI's Deenish site licence was revoked in 2019 by Minister Creed, this licence is still currently revoked as ALAB haven't issued a judgment on MOWI's appeal on this matter yet. So, Minister, how can there be a Public Consultation to renew a licence that does not currently exist?

Without prejudice to the above, GBASC want to make the following comments,

Galway Bay Against Salmon Cages (GBASC) are asking you to reject the MOWI renewal application for their Deenish Island salmon farm Site, Ref: T06/202 on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine Michael Creed in April 2019 for overstocking by 121%. If you consent to this renewal application and grant renewal of the said licence then you will be saying that the former Minister and indeed your own department were wrong in revoking the Deenish site licence. You will also be setting a terrible precedent whereby MOWI and other salmon farm operators could not be sanctioned in the future for breaking the conditions of their licences, also it would be perceived by the public and rightly so, that MOWI were ignoring the authority of our state agencies that are tasked to regulate them. I refer you to correspondence from Minister Creed and your department to ALAB in relation to the appeal by MOWI regarding Minister Creeds revoking of the Deenish licence (letter dated 19th Dec.2019) titled, Observations Submitted by DAFM under Section 44(2) of the Fisheries (Amendment) Act 1997. It states on page 6;
"It is clearly in the public interest that the Department enforce licences issued to operators in order to uphold the integrity of the States regulatory regime in respect of food production from the Marine

environment. It is not in the public interest that operators should be permitted to interpret the terms and conditions of their licences in a manner which is contrary to the natural and ordinary meaning of such terms and conditions in order to obtain a commercial advantage. A failure or perceived failure by the Department to properly enforce licence conditions would provide an incentive for further non-compliance by the Appellant (MOWI) and perhaps non-compliance by other operators within the sector. Failure by the Department to enforce licence conditions would be anti-competitive as it has the potential to afford a significant commercial advantage to the non-compliant operator. The maintenance and development of Ireland's food exports is dependent on an acceptance by the general public and authorities in other jurisdictions of the efficacy of Ireland's regulatory regime. For this reason, it cannot be said that for the Department to ignore a very significant breach of licence conditions is in the public interest."
It also states on page 2 of the same document that, "It is the Department's view that the breach is manifestly obvious, is supported by the applicable engineering reports, is acknowledged by the Appellant and is based on figures actually supplied by the Appellant."
"Furthermore the breach represents an excess of 121% in the stock permitted to be harvested from the site."
Also on page 2 it states;
"It is the consistent view of the Department that the Minister's decision to treat as discontinued the statutory entitlement of Silver King Seafoods Ltd. to continue aquaculture operations under the provisions of Section 19A (4) of the 1997 Fisheries (Amendment) Act, is warranted by the undisputed facts of this case and is proportionate having regard to the very significant excess in the stock harvested (121%)."

Minister, your own personal support for MOWI should be set aside in favour of the former Minister Creeds and your Department's view that the Deenish licence should be discontinued.
GBASC hope that as a result of your Department's experience in trying to revoke MOWI's Deenish licence for breaking the conditions of their licence, you now realise that once a salmon farm licence is granted under the present regulations, it is almost impossible to revoke it, thus allowing salmon farms to continue operating. Disgraceful.

In the last number of years, so-called Irish organic salmon farms have been affected by various viral and bacterial diseases causing millions of mortalities and huge losses for the Irish salmon farming industry. It is widely accepted that these diseases are triggered by stress factors such as sea lice infestations, Jellyfish attacks, handling issues associated with pumping the salmon from the cages into wellboats and vice versa, pesticide treatments, and toxic algal blooms caused by the high nutrient rate emitting from the salmon farms. While algal blooms may be naturally occurring, they are fueled by the massive amounts of nutrients emanating from the salmon farms. All of the above biological issues are happening more frequently in Irish waters as a result of increasing sea temperatures around our coast, these sea temperatures it seems, will continue into the foreseeable future, making it extremely difficult to farm salmon in these conditions. Irish sea waters are now no longer suitable for open sea cage salmon farming, (not that they ever were), and this is borne out by the fact that MOWI, according to their preliminary Stock Market report for Quarter 4 of 2023 did not harvest any salmon for the period mentioned above and had zero profits as a result. (See copy attached). They also lost money in 2022 as a result of those "Biological Issues" mentioned above according to their Stock Market report for that year. Just think of how many tonnes of wild fish were wasted on all those millions of dead farmed salmon. How can salmon farming be sustainable?

Minister, the re-emergence of Salmonid Rickettsial Septicaemia (SRS) on Irish salmon farms and the prevalence of Furunculosis in salmon farms and smolt hatcheries is very worrying that these bacterial diseases or indeed Gill and viral diseases such as Pancreas Disease, Piscine Reovirus, Cardiomyopathy Syndrome, Amoebic Gill Disease, etc. may be harmful to wild salmon, sea trout, other fish species and Shellfish stocks. These diseases are now endemic on Irish salmon farms and may be hazardous to endangered wild salmon stocks migrating through Irish waters so therefore, the EU Habitats Directive Precautionary Principles must be applied when determining the licence renewal application.
GBASC have requested the 2023 farmed salmon mortalities on Irish salmon farms reports from the Marine Institute (MI) under AIE Regulations, as the information requested may not be supplied to us before the 12th February deadline, we ask that the MI mortality reports be included in our submission once they become available.

Ever since the reopening in 2010 of the Deenish open sea cage salmon farm in Kenmare Bay, the Lough Currane lake and Waterville river Fisheries have lost the majority of their wild salmon and sea trout stocks due to sea lice infestations and disease from nearby salmon farms resulting in a huge loss of tourism revenue to the surrounding areas. The total collapse of sea trout stocks in the Waterville area is proven by the fact that IFI had to introduce a catch & release bye-law in 2018 to try and conserve the remaining sea trout stocks in the Currane Fishery.
Since 2013 the Marine Institute, DAFM and the salmon farming industry have used the outdated and possibly flawed Jackson et al sea lice research paper to greenwash and prop up the Irish salmon farming industry. It is now time to scrap this research paper and accept the more up-to-date and much broader, overwhelming field of Irish and International peer reviewed research papers that contradict the findings in the Jackson et al paper.

Farmed salmon are escaping from Irish salmon farms on a regular basis for years, mostly during severe storm conditions but as many of these storms occur during winter months when no angling takes place, it is very hard to produce the evidence that an escape had actually occurred as these escapes are not reported by the salmon farmers to either the MI or DAMF, we have to rely on whistleblowers in the salmon farming industry to inform us of escapes. Even when escapes occur during the Spring/summer months when anglers are fishing and catch escapees, it is near impossible to identify what salmon farm they escaped from without them being micro-tagged. It is widely accepted that escaped farmed salmon have the potential to interbreed with our precious endangered wild iconic salmon, weakening them genetically and reducing the survival rates of any offspring.
It is shameful that millions of wild wrasse have been plundered from our bays all along the South and West coast since 2015 without any Appropriate Assessments to access the wild stock numbers and to determine the adverse effects the removal of such huge numbers of wild wrasse will have on the marine environment and on other fish species that depend on the wrasse as cleaner fish. Tens of thousands of these wild wrasse have been sacrificed for use on the Deenish site over that time. Check MI records.
Farmed cleaner fish are now been used on Irish salmon farms, these farmed cleaner fish, when they escape, may also have the potential to interbreed with wild stocks and weaken them genetically similar to escaped farmed salmon.

Because of the ludicrous situation whereby salmon farmers do not have to report any mortalities as a result of a non notifiable disease, we the public, consumers and indeed, some Government agencies will never know the true extent of the mortalities and terrible welfare issues on Ireland's so-called organic salmon farms which includes the Deenish site.

It has come to our notice that MOWI has voluntary withdrawn their Deenish salmon farm and a number of their other salmon farms from the Aquaculture Stewardship Council certification process in 2022, (see copy attached) presumably because of the increasing amounts of antibiotics that have to be used to try and save their stocks from the ravages of SRS, Furunculosis and other bacterial diseases. GBASC are awaiting confirmation on whether or not the Deenish salmon farm is currently certified as organic. However, we request that this information be included in this submission once it becomes available.

As the Deenish salmon farm is operating in Kenmare River SAC (Site code:002158) and Deenish Island and Scariff Island SPA, it is imperative that the use of antibiotics, toxic pesticides to treat sea lice infestations, antifouling agents and other toxic chemicals are taken into account when determining whether to grant the renewal application or not. It is unwise to create jobs that "POLLUTE TO PRODUCE." These jobs displace many more jobs in the sustainable angling/tourism and inshore sector. Open salmon sea cages where the polluter does not pay, means the operator gets the profit while we and the marine environment get the waste, diseases and escapees.

Minister, We are in the middle of a climate and species extinction crisis and as you may know, the wild Atlantic salmon has recently been placed on the Red List of endangered species by the International Union for Conservation of Nature. It is now your duty as Minister for the Marine and the Government's duty to protect the last remaining wild Atlantic salmon in Irish waters, the Precautionary Principles of the EU Habitats Directive must be applied and the MOWI Deenish licence T06/202 application should be refused.

Yours sincerely,
On behalf of Galway Bay Against Salmon Cages.

[redacted]



MOWI

**Harvest volumes Q4 2023 (1)**

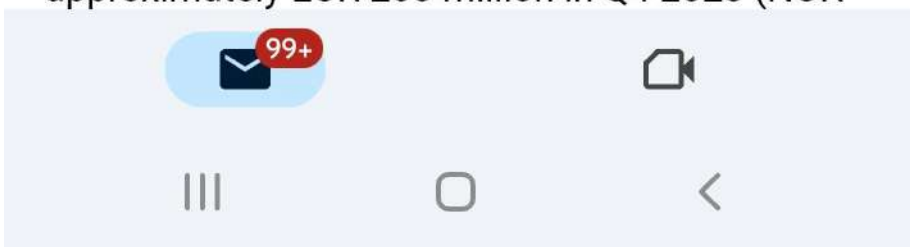
| | |
|---|---|
| Farming Norway | 81.0 thousand tonnes |
| Farming Scotland | 10.5 thousand tonnes |
| Farming Chile | 27.5 thousand tonnes |
| Farming Canada | 4.0 thousand tonnes |
| Farming Ireland | - thousand tonnes |
| Farming Faroes | 3.5 thousand tonnes |
| Farming Iceland (Arctic Fish) | 2.5 thousand tonnes |
| Total | 129.0 thousand tonnes |

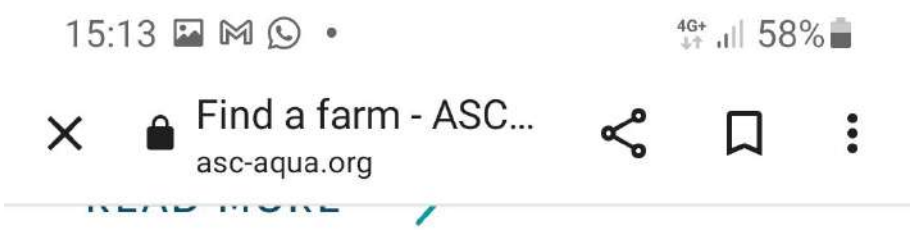
Full year harvest volumes were record-high 475 thousand tonnes in 2023 versus 464 thousand tonnes in 2022.

**Note:**
(1) The harvest volumes are provided in gutted weight equivalents (GWE).

**Additional information**

Operational EBIT for the Group was approximately EUR 203 million in Q4 2023 (NOK






READ MORE

ASC CERTIFICATE: **ASC01362**

## Mowi Ireland

CAB CERTIFICATE ID: **ASC-SGS-F-004**

| | |
|---|---|
| **FARM (UOC)** | Deenish Farm |
| **COUNTRY/TERRITORY** | Ireland |
| **SPECIES** | Salmo salar (Atlantic salmon) |
| **STATUS** | Cancelled |

READ MORE

ASC CERTIFICATE: **ASC01178**

## Mowi Ireland

15:14 • 57%

# Number of certified sites : 2

CAB CERTIFICATE ID: **ASC-SGS-F-068**

| | |
|---|---|
| **FARM (UOC)** | Inishfarnard Farm, Deenish Farm |
| **COUNTRY/TERRITORY** | Ireland |
| **SPECIES** | Salmo salar (Atlantic salmon) |
| **STATUS** | Cancelled |

READ MORE →

ASC CERTIFICATE: **ASC01188**

## Mowi Ireland

CAB CERTIFICATE ID: **ASC-SGS-F-069**

# Threats to sea trout in Norway

VITENSKAPELIG RÅD FOR LAKSEFORVALTNING



Photo: Eva B. Thorstad

## Short summary

The Norwegian Scientific Advisory Committee for Atlantic Salmon has earlier shown that sea trout in many watersheds in Norway is in a poor state, except in Northern Norway, where sea trout is in a better state than the rest of the country. For the first time, we have now assessed the threats from human activities to sea trout. Salmon lice from aquaculture farms is the largest threat to sea trout. The impact of salmon lice is so large, and covers such large geographical area, that this threat alone has been and will be the determining factor for the future development of sea trout. To improve the situation, the salmon lice infestation pressure from fish farms must be considerably reduced. Climate change is the second largest threat. Culverts, channelisation, other habitat alterations, and agriculture are also threats to sea trout, but to a smaller extent than salmon lice and climate change. Hydropower production, water abstraction for other purposes than power production, and infectious diseases also have a significant negative impact on sea trout.

The full report is published in Norwegian: https://brage.nina.no/nina-xmlui/handle/11250/3093719

## Norwegian Scientific Advisory Committee for Atlantic Salmon

The Norwegian Scientific Advisory Committee for Atlantic Salmon is appointed by the Norwegian Environment Agency to evaluate status of salmon and sea trout and importance of different threats, and to give science-based catch advice and advice on other issues related to management of wild salmonids.

Thirteen scientists from seven institutions serve on the committee: Torbjørn Forseth (leader), Sigurd Einum, Peder Fiske, Morten Falkegård, Øyvind A. Garmo, Åse Helen Garseth, Helge Skoglund, Monica F. Solberg, Eva B. Thorstad, Kjell Rong Utne, Asbjørn Vøllestad, Knut Wiik Vollset and Vidar Wennevik. The committee is an independent body, and the members do not represent the institutions where they are employed when serving on the committee.

Contact: Torbjørn Forseth (torbjorn.forseth@nina.no), Eva B. Thorstad (eva.thorstad@nina.no), Peder Fiske (peder.fiske@nina.no), or any other member of the committe. www.vitenskapsradet.no

# Extended summary

## Background and methods

The Norwegian Scientific Advisory Committee for Atlantic Salmon has earlier shown that sea trout in many watersheds in Norway is in a poor state, except in Northern Norway, where sea trout is in a better state than the rest of the country. The committee has developed a classification system to rank the threats from human activities to Atlantic salmon (**figure 1**, Forseth et al. 2017). The assessment of threats to Atlantic salmon is updated annually. The same system is now for the first time used to assess the major threats to sea trout. For each human impact factor, the *effects* (**figure 1**) are assessed in terms of number of affected populations, reduction in production capacity in affected populations, number of critically endangered or lost populations, and implemented mitigation measures (**table 1**). In addition, the *development* (**figure 1**) is assessed in terms of likelihood that the human activity will result in further reductions in population size or loss of populations in the future (**table 1**).

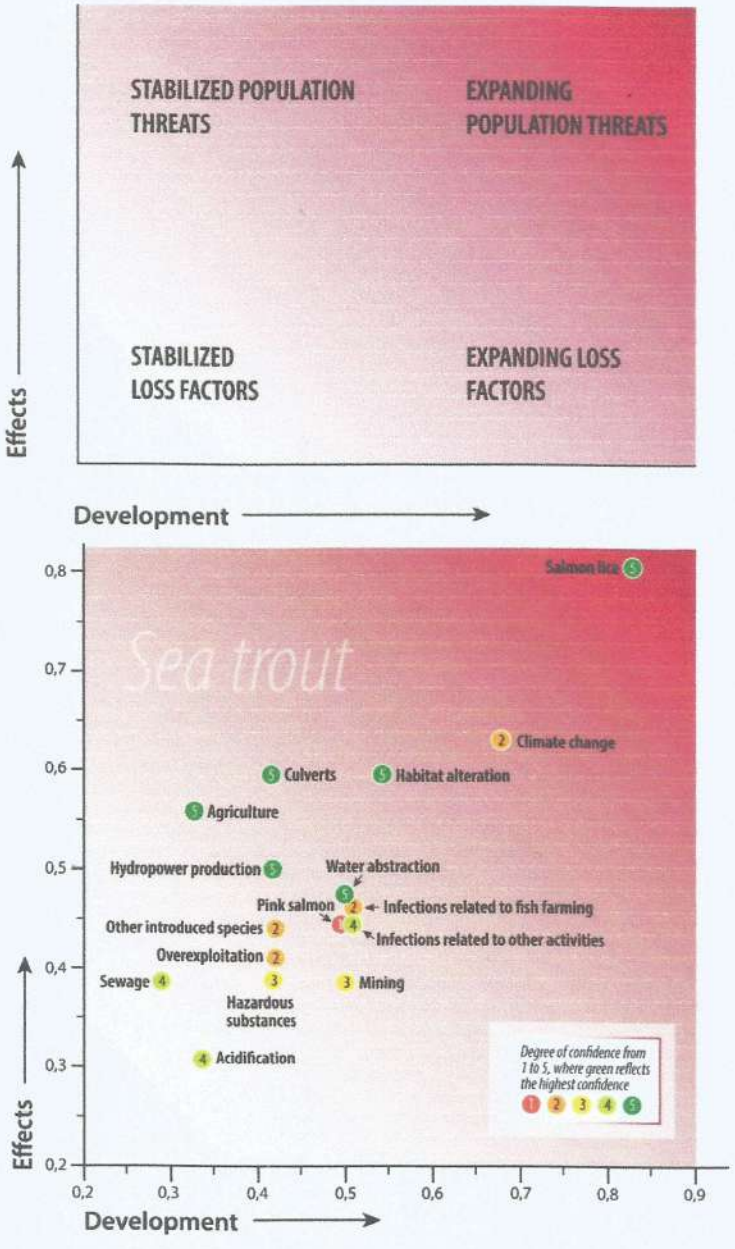



***Figure 1.***

***Upper graph: The classification system developed to rank different anthropogenic impacts to Norwegian Atlantic salmon and sea trout populations along the effect and development axes.*** *The four major impact categories are indicated, but the system is continuous. Dark background colour indicates the most severe impacts. The effect axis describes the effect of each impact factor on the populations, and ranges from factors that cause loss in adult returns, to factors that cause such a high loss that they threaten population viability and genetic integrity. The development axis describes the likelihood for further reductions in population size or loss of additional populations in the future.*

***Lower graph: Ranking of 16 impact factors considered in 2022, according to their effects on sea trout populations, and the likelihood of a further negative development.*** *Confidence for the assessment of effect by each threat is indicated by the color of the markers, where green indicates the highest confidence level and red the lowest.*

There are at least 1251 watersheds holding sea trout in Norway. The classification of state of sea trout from the previous assessment (Norwegian Scientific Advisory Committee for Atlantic Salmon 2022) provided data from these watersheds that could be used in the present assessment of threats. In addition, scoring was done based on relevant scientific articles, Norwegian reports, other public documents, and the expert judgment of members of the committee. Scoring for each impact factor is given in **table 1**. For the assessment, we define sea trout as trout moving into saltwater for parts of their life. This means that we consider a sea trout population as lost if the migration route to the sea is blocked, or if survival at sea is so low that the migratory part of the population is lost. A watershed with a lost sea trout population can still have resident trout, but anadromy has been lost.

Confidence in the assessment of effect for each human impact is given based on a scoring of how well the impact is documented, i.e., the knowledge level, and the level of agreement in the documentation. Both knowledge level and agreement are scored and combined into an overall confidence level, on a five-point scale from low to very high.

**Major threats to sea trout – Results of the assessment**

Salmon lice from aquaculture farms is by far the largest threat to sea trout (**figure 1**). Sea trout are severely affected by salmon lice infestations in many watersheds in large parts of the country (**figure 2**). High salmon lice levels also affect sea trout in parts of the country where sea trout until now have had a better state than in the rest of the country. The impact of sea trout is so large and covers such large geographical area that this threat alone has been and will be the determining factor for the development of sea trout. To improve the situation for sea trout, the salmon lice infestation pressure from fish farms must be considerably reduced. Current mitigation measures are insufficient to hinder expansion of negative impacts in the future.

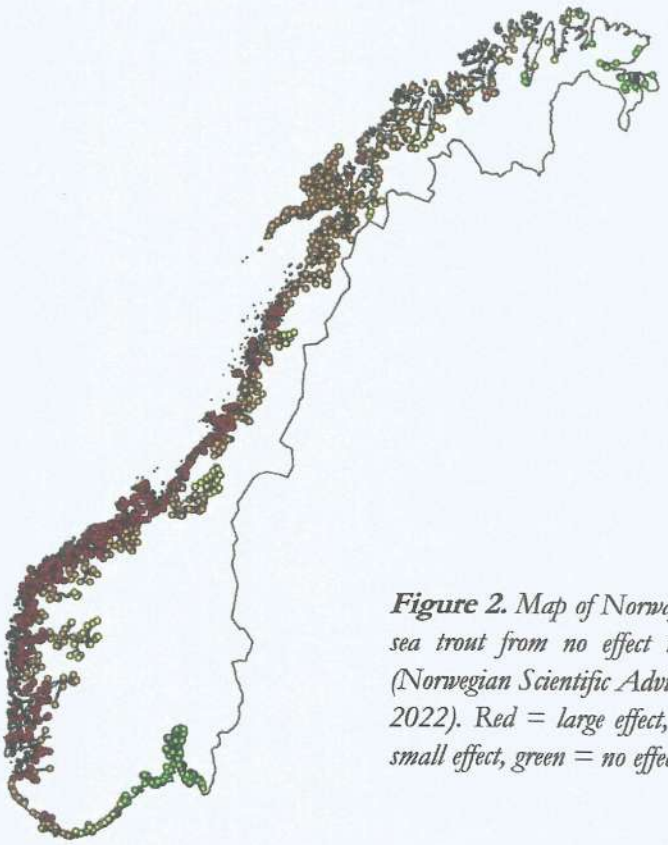


***Figure 2.*** *Map of Norway showing the effect of salmon lice on sea trout from no effect to large effect in 1222 watersheds (Norwegian Scientific Advisory Committee for Atlantic Salmon 2022). Red = large effect, orange = moderate effect, yellow = small effect, green = no effect.*

Climate change is the second largest threat to sea trout. Climate change is assessed as a non-stabilised population threat, but to a smaller extent than salmon lice. Climate change is like salmon lice assessed as an expanding threat, which means sea trout is affected to the extent that populations may be critically endangered or lost in nature, and there is a high likelihood these threats will cause further reductions of sea trout in the future (**figure 1**). Culverts, channelisation, other habitat alterations, and agriculture are also threats to sea trout, but to a smaller extent than salmon lice and climate change (**figure 1**). The risk of further expansion of the negative effects of habitat alterations is relatively large, whereas the risk of a further expansion due to agriculture and culverts is smaller. Hydropower production, water abstraction for other purposes than power production, and infectious diseases also have a significant negative impact on sea trout. There is an underexploited potential for improving conditions for sea trout related to all these threats.

The knowledge of impacts of salmon lice, culverts, agriculture, hydropower development water abstraction and other habitat alterations is very good, hence the confidence of the assessment is very good (**figure 1**). Alien pink salmon is a new threat to sea trout and other salmonids, and the assessment is given with low confidence due to the lack of knowledge of effects. The impacts of overexploitation, infections related to fish farming, climate change and other alien species than pink salmon are also uncertain. Overexploitation is difficult to assess because of poor quality of the catch statistics in some fisheries, and because populations sizes are not estimated and compared with spawning targets for each of the watersheds.

**References**

Forseth, T., Barlaup, B.T., Finstad, B., Fiske, P., Gjøsæter, H., Falkegård, M., Hindar, A., Mo, T.A., Rikardsen, A.H., Thorstad, E.B., Vøllestad, A. & Wennevik, V. 2017. The major threats to Atlantic salmon in Norway. ICES Journal of Marine Science 74: 1496-1513.

Norwegian Scientific Advisory Committee for Atlantic Salmon 2022. Classification of the state of sea trout in 1279 watersheds. Temarapport number 9, 170 pp. In Norwegian.

Norwegian Scientific Advisory Committee for Atlantic Salmon 2022. Assessing the threats to sea trout. Temarapport number 12, 37 pp. In Norwegian

***Table 1.*** *Scores given for each human impact affecting sea trout along the effect and development axis. For each of the axes, sum of scores and compiled relative effect (proportion of maximum number of points possible) are given. Knowledge level for effects and level of agreement in the documentation are combined into an assessment of confidence for each of the human impacts, on a five-point scale from 1 = low to 5 = very high.* ***Figure 1*** *is a graphic illustration of the compiled relative effects and confidence of assessments.*

| Effect axis: Characteristics considered | POINTS AND CRITERIA | Hydropower production | Water abstraction (other than hydropower) | Acidification | Agriculture | Sewage | Hazardous substances | Mining | Overexploitation | Salmon lice | Infections related to fish farming | Infections related to other activities | Climate change | Habitat alteration (channelisation, embankments etc.) | Other introduced species than pink salmon | Pink salmon | Culverts |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **1 Number of affected populations** | 1: <150, 2: 151-300, 3: 301-600, 4: > 600 | 2 | 1 | 1 | 3 | 2 | 1 | 2 | 2 | 4 | 2 | 2 | 4 | 3 | 2 | 2 | 3 |
| **2 Effects on production** | 1: Small reduction < 10% | 2 | 2 | 1 | 2 | 1 | 1 | 1 | 1,5 | 3 | 1 | 2 | 1 | 2 | 1 | 1 | 1,5 |
| Typical effect on a population in terms of reduced production capacity, smolt production or sea survival | 2: Moderate reduction 10-29% | | | | | | | | | | | | | | | | |
| | 3: Large reduction 30-75% | | | | | | | | | | | | | | | | |
| | 4: Very large reduction > 75% | | | | | | | | | | | | | | | | |
| **3 Number of lost or critically endangered populations in nature** | 1: None, 2: 1-15, 3: 16-50, 4 > 50 | 2 | 2 | 1 | 2 | 1 | 2 | 1 | 1 | 2,5 | 1 | 1 | 1 | 2 | 1 | 1 | 2 |
| **4 Implemented mitigation measures** | 1: Extensive, with large effects | 2 | 2,5 | 2 | 2 | 2 | 2 | 2 | 2 | 3 | 3 | 3 | 4 | 2,5 | 3 | 3 | 3 |
| (i.e., measures that reduce effect on production or likelihood that populations will be critically endangered or lost) | 2: Many, with good effects | | | | | | | | | | | | | | | | |
| | 3: Few, or measures with small effects | | | | | | | | | | | | | | | | |
| | 4: Very few or no, or measures without net effect | | | | | | | | | | | | | | | | |
| Sum (maximum 16) | | 8 | 7,5 | 5 | 9 | 6 | 6 | 6 | 6,5 | 12,5 | 7 | 8 | 10 | 9,5 | 7 | 7 | 9,5 |
| **Compiled relative effect (0-1)** | | 0,50 | 0,47 | 0,31 | 0,56 | 0,38 | 0,38 | 0,38 | 0,41 | 0,78 | 0,44 | 0,50 | 0,63 | 0,59 | 0,44 | 0,44 | 0,59 |
| Knowledge, agreement / combined confidence in the assessment | | 3,3/5 | 3,3/5 | 2,3/4 | 3,3/5 | 2,3/4 | 2,2/3 | 2,2/3 | 1,2/2 | 3,3/5 | 1,2/2 | 2,3/4 | 2,1/2 | 3,3/5 | 2,1/2 | 1,1/1 | 3,3/5 |

*Table 1 continues*

| Development axis: Characteristics considered | POINTS AND CRITERIA | Hydropower production | Water abstraction (other than hydropower) | Acidification | Agriculture | Sewage | Hazardous substances | Mining | Overexploitation | Salmon lice | Infections related to fish farming | Infections related to other activities | Climate change | Habitat alteration (channelisation, embankments etc.) | Other introduced species than pink salmon | Pink salmon | Culverts |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **1 Potential for effective measures** (projection of present situation) | 1: Extensive and very effective measures are planned<br>2: Several and effective measures are planned<br>3: Some effective measures, or measures with small effects are planned<br>4: Few or no effective measures are planned | 2 | 3 | 2 | 2 | 1,5 | 2 | 2,5 | 3 | 3 | 3 | 4 | 3 | 3,5 | 3 | 2,5 | 2,5 |
| **2 Likelihood of further production losses** (projection of present situation) | 1: Low<br>2: Moderate<br>3: High<br>4: Very high | 2 | 2 | 1 | 1 | 1 | 2 | 2,5 | 2 | 4 | 2 | 3 | 3 | 2 | 1 | 2,5 | 1,5 |
| **3 Likelihood of additional populations becoming critically endangered or lost** (projection of present situation) | 1: Low<br>2: Moderate<br>3: High<br>4: Very high | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 3 | 1 | 1 | 2 | 1 | 1 | 1 | 1 |
| Sum (maximum 12) | | 5 | 6 | 4 | 4 | 3,5 | 5 | 6 | 6 | 10 | 6 | 8 | 8 | 6,5 | 5 | 6 | 5 |
| **Compiled development (0-1)** | | 0,42 | 0,50 | 0,33 | 0,33 | 0,29 | 0,42 | 0,50 | 0,50 | 0,83 | 0,50 | 0,67 | 0,67 | 0,54 | 0,42 | 0,50 | 0,42 |

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 13:22
**To:** FinfishPC
**Subject:** MOWI Licence

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Dear Minister McConalogue,

I wish to object to the renewal of the MOWI Deenish licence application on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed in 2019 for overstocking by 121%.
Minister, if you renew this licence you will be rewarding MOWI for breaking the conditions of their licence and set a dangerous precedent for future licence infringement cases.
As the Deenish salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA, the EU Habitats Directive precautionary principles should apply and the MOWI renewal application should be refused .

Yours sincerely
[redacted]

**From:** Cleo Murphy <cleo.murphy@greenparty.ie>
**Sent:** Tuesday 6 February 2024 13:23
**To:** FinfishPC
**Subject:** Reference T06/202 - Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

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Dear Minister McConalogue

As the Green Party representative on the Ring of Kerry, I am writing to object to the granting of this salmon-farming licence:
**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Green Party policy on aquaculture includes the following principle: *The Green Party calls on the Government to end new licensing of offshore farmed salmon and supports the development of an alternative onshore salmon farm industry.* We have to move away from open-water, net-pen fish farms that are causing untold damage to the local marine ecosystem toward onshore salmon farming.

As per the excellent submission made to you on this matter by [redacted]: *According to a report published on Fishfarmingexpert.com one such company in Norway, Andfjord Salmon, which is developing a novel flow-through land-based fish farm on the island of Andøya in western Norway, reported that their method is "40% ahead of net pen fish". Biological conditions are excellent, leading to high growth, industry-leading survival rate, and an attractive feed conversion ratio.*

Let's abandon the licensing of open-water fish farms in favour the more sustainable onshore option.

The Ballinskelligs/Waterville area has experience of the damage caused to wild salmon and sea trout stock in the area by open-water salmon farming. Stocks depleted when salmon farming began in the 1990s but restored during its closure from 2004 to 2010. Since then, stocks are once again declining.

I would draw your attention to the Draft Local Area Plan for the Kenmare MD (of which Ballinskelligs and Waterville are part):
*The Lough Currane, Cummeragh and Inny River Catchments where a world-renowned sea trout/salmon fishery can be found is a significant contributor to the tourism economy of the Waterville area. Further investment in sustainable fisheries development has the potential to significantly contribute to increased tourism days and spend in the area.*

I would further draw your attention to research carried out by Inland Fisheries Ireland: Fish farms indicted on sea trout - Debate is over (irishexaminer.com)

Clearly, the sustainability of sea trout and wild salmon fishing is threatened by salmon farming. We on the Ring of Kerry are striving to develop a type of sustainable tourism that will create livelihoods for the

people who live here – guides, gillies, accommodation providers, café-owners, gift shop owners and more. I would plead with you not to grant licence to a practice which damages a niche part of this effort.

Yours sincerely
Cleo Murphy



**Cleo Murphy**
Election Candidate
Kenmare/Ring of Kerry

**Mobile:** 087 260 7114
**Webpage:** Cleo Murphy | Green Party

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 17:06
**To:** FinfishPC
**Subject:** Fish Farm at Deenish Island

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Good afternoon,

I oppose the renewal of the licence of the fish farm at Dennish Island for several reasons. These reasons are listed below:

1. Over stocking
The operators of this fish farm have been found to be holding more than the maximum limit of fish on more than one occasion. This has happened twice that I am aware of. This shows a lack of respect for the local environment, laws and licensing system. There is excess pollution and damage to the environment caused by overstocking. There is no guarantee that the operators would conform to any new licence conditions. In fact they may flout them again.

2. Litigation
When the licence was revoked by the Department of Agriculture, the operators sought to frustrate this decision by way of the courts. They continually sought adjournments and would not proceed to a full hearing for more than two years. Again, it shows the contempt this operator has for the laws by seeking to frustrate their implementation. This has increased the cost to the state and taxpayers. Granting this farm a new license would be a reward for this litigious behaviour. Who would be deterred by licence conditions if the Department of Agriculture was not bothered to enforce them?

3. Damage to Local Environment & Wild Fish Stocks
Waterville lake is a very important reservoir of wild sea trout and salmon. This population flourished until this fish farm became operational. Fish farms are destructive to the environment in the immediate vicinity of the cages. The sea beneath the cages resembles a desert and is dead to all sea life. This is caused by chemicals used to control diseases, sea lice, and other pollution. Also, the wild fish have to pass near the cages on their way to sea as juveniles and to spawn as adults. Studies have shown that in areas where fish farms are situated this results in a plague of sea lice which attach to the fish and terminally weaken them. Fish numbers may never recover and may decline further if this fish farm licence is renewed or under the present new application increased in size.

4. Local Economy
The local economy greatly benefits from tourist anglers and their families who fish Waterville lake and the River Inny. Anglers come from all over the world to fish in Waterville. They may also visit to play Golf and fish for sea trout. The visitor numbers have dropped significantly in the last few years due to falling numbers of wild trout & salmon reaching the rivers and lakes. This catchment area is a major tourist resource for the Irish people and future generations. it would be a crime to let it be destroyed. I believe the tourist income derived from the area is in excess of the income to the area from this fish farm. There have been several studies that have confirmed this view.

5. Parent Company & Damage in African Waters
The Financial Times has recently produced a scathing report on the behaviour of Mowi in African waters. Millions of tons of small fish are being harvested there, for export as fish feed in their salmon farms. Norway alone required 2mn tonnes of whole fish to produce 1.5mn tonnes of salmon in 2020. A link to this article is below. Local fishing industries are being destroyed there.

https://ig.ft.com/supermarket-salmon/

Yours Sincerely,

[redacted]

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 17:38
**To:** FinfishPC
**Subject:** Objection T06/202

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Dear Minister

The MOWI Deenish licence Ref:T06/202 was revoked in 2019 by former Minister for Agriculture, Food and the Marine Michael Creed for overstocking by 121%.

Minister if you exceed to this renewal application and grant renewal of the said licence then you will be saying that the former Minister and his/your department were wrong in revoking the licence and set a dangerous precedent for future licence infringement cases. You will also be rewarding MOWI for breaking the conditions of their licence.
This salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA so the EU Habitats Directive Precautionary Principles must be applied and the renewal application refused.

Caged salmon farming is devastating indigenous salmonoid species here in Ireland

Please don't grant this license.

A concerned angler and citizen.

[redacted]

Sent from Yahoo Mail on Android

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 18:47
**To:** FinfishPC
**Subject:** T06-202, Silver King seafoods aquaculture and foreshore license application at Deenish, Co. Kerry.
**Attachments:** Deenish submission.docx

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Dear Sirs,
I object to the application for an aquaculture and foreshore license by Silver King Seafoods at Deenish , Co. Kerry. Please see attached my submission.
Yours faithfully,
[redacted]

[redacted]

The Minister for Agriculture Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen,
Clonakilty
Co. Cork
By email to finfishpc@agriculture.gov.ie

6/2/2024

**RE: T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry.**

Dear Sir,

I refer to the application of Silver King Seafoods to operate a salmon farm off Deenish Island Co. Kerry. I object to this application and I urge you to refuse this licence application.

Since this farm started to operate at this site it has had, and continues to have a significant negative and ongoing impact on the population of Atlantic salmon and sea trout in this area. The Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment Special Area of Conservation is both close to, and hydraulically connected to the location of this operation. Both Freshwater Pearl Mussel (FPM) and Atlantic Salmon are qualifying interests for this site. The conservation objective for Freshwater Pearl Mussel in this site is to restore the favourable condition of FPM in the SAC. This is to be achieved by reaching the target for host fish in the SAC which is to maintain sufficient juvenile salmonids to host glochidial larvae. The conservation objective for Atlantic Salmon at this site is to maintain the favourable conservation condition of Atlantic Salmon in the SAC. This is to be achieved by consistently exceeding the Conservation limit for Atlantic salmon in each of the river systems in the SAC.

In spite of the mitigation measures adopted by the operator to reduce the impact that sea lice has on salmonids in the area, the populations of Atlantic Salmon and Sea Trout have reduced drastically since this salmon farm opened. Sea Trout are now so few in numbers that it is not permitted to catch and keep Sea Trout in the Waterville fishery. The mitigation measures proposed in the Natura Impact Statement are not effective. By permitting this operation, you will be allowing an adverse affect on the integrity of the SAC namely by allowing the number of salmonids in the Currane system to decrease and by allowing the Atlantic salmon population to reduce below its conservation limit. These impacts will directly and negatively impact the conservation objectives for Freshwater Pearl Mussel and for Atlantic Salmon. Section 42(16) of the 2011 Habitats regulations state that consent can only be given for a plan or project after having determined that the plan or project shall not adversely affect the integrity of a European Site.

The operation of this salmon farm has had and will have an adverse affect on the integrity of the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment Special Area of Conservation and therefore cannot be permitted.

Notwithstanding the EU Habitats Directive, the operation of this salmon farm has had a continuing significant negative impact on the local economy and people in Waterville. Before the salmon farm commenced its operation Lough Currane was world renowned as a fantastic sea trout fishery. This fishery supported a large number of ghillies and local enterprises including Hotels, bed and breakfasts, tackle shops, pubs, restaurants and garages. When the salmon farm commenced operation, this had a devastating impact on sea trout numbers. This in turn led to a reduction in the number of anglers coming to Waterville which caused two hotels and a number of shops to close. The benefit of this salmon farm operating to the local and national economies is far outweighed by the loss of revenue that resulted from the collapse of the sea trout fishery.

This salmon farm is bad for the environment, bad for the economy and bad for society and should not be permitted.

Yous Faithfully,

[redacted]

**From:** [redacted]
**Sent:** Tuesday 6 February 2024 21:41
**To:** FinfishPC
**Subject:** Submission re planning application of Fish farm

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Dear Minister McConalogue,
I refer to the recent Licence renewal application by Silver King Sea foods Limited (T06/202).

Can I urge you to please reject this application on the grounds of the safety and fear of extinction of our native wild salmon and sea trout stocks .

I have fished Lough Currane and several other rivers and lakes in the area over the last 30 years and the fall off in salmon and sea trout numbers returning to the area is to say the least extremely concerning.

I blame this decline on the presence of a fish farm operated by SIlver King Sea foods in the bay adjacent to Waterville as scientific studies have proven the detrimental effect salmon farms have on native salmon and sea trout stocks.

While I appreciate these fish farms bring economic value to our country I would argue that the economic damage done to Waterville and surrounding areas over the last 15 years far out weighs this.

Minister I urge you to please use your powers to reject this application and save our native stocks of salmon and sea trout so future generations can enjoy and see them

Yours Sincerely
[redacted]

**From:** [redacted]
**Sent:** Wednesday 7 February 2024 09:58
**To:** FinfishPC
**Subject:** Fish farm license T06/202

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Sir / Madam

I am writing to object to the granting of a fish farm license on the shore of Deenish Island Co. Kerry.

As you know, salmon farming has proven to be a major contributor to the crash of wild populations of sea trout ( and salmon ) populations on the West Coast of Scotland and Ireland. The wild Atlantic salmon is now officially an endangered species.



Freshwater fish highlight escalating climate impacts on species - IUCN Red List
iucn.org

Granting this license would only accelerate the decline of this species.

Two major reasons for an Objection

1. Fish farming at sea in coastal areas as practised today by MOWI and others is an abominable practice. If it was operated on land it would be banned tomorrow. The fish are farmed in overcrowded cages, causing them to stress, eat each other, swim in their own excrement and spread disease. The mortality rate of the fish is 20% before they are harvested. Imagine the public outcry if 20% of all pigs and calves died before they were slaughtered due to bad farming practices.

I urge you to visit one of these farms. They attract vast numbers of parasites and sea lice which kill the farmed fish and the wild fish that migrate passed the cages.



The farms have to use chemicals to keep the sea lice at bay which people then eat. The fish are fed pellets which are dyed pink to make the flesh of the salmon look natural . The sea beds below these cages are devoid of natural life due to faeces build up and the imbalance of chemicals so it destroys the natural habitat. What life exists is pink due to consumption of these pellets. I expect you might think again when you choose to buy farmed salmon if you see the state of the fish. Do you want to be responsible for the below ?



Furthermore, the practice is highly unsustainable. Tons of perfectly healthy wild fish are caught off the coast of Africa and mushed to pulp to produce pellets to feed these farmed fish. Shipped and flown. These wild fish are crucial in the food chain to the people of west Africa and stocks are being deleted. How can we justify destroying a stock of wild fish that is food for a poorer country to feed farmed fish for the consumption of a richer society.

2. The decline in wild fish which will be inevitable if this farm operates has a major negative impact on tourism, jobs and the economy of South West Ireland. Fishermen come to fish ( returning the vast majority of fish they catch ) and spend money in hotels , pubs and restaurants. They use the services of gillies whose livelihood depends on it. Many hotels and pubs will be forced to close if the fishermen cease to visit Co.Kerry.

Fish farming is inevitably here to stay as it produces cheap food for an increasing population. But on your conscience …at what cost for the environment, habitat and wild fish of the region ? Granting this license will add to the decline of iconic species such as wild sea trout and salmon and have disastrous economic consequences for the South West of Ireland. There are alternatives - ask MOWI to invest in land locked farming which they are perfectly capable of doing…last year MOWI generated revenues of approx EUR 4 billion and EUR 1 billion in profit.

Sincerely

[redacted]

Sent from my iPhone

**From:** [redacted]
**Sent:** Wednesday 7 February 2024 12:10
**To:** FinfishPC
**Subject:** Salmon Farm on Lough Currane

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Dear Sir/Madam,

I have spent many enjoyable holidays fishing for Sea Trout with the fantastic ghillies on Lough Currane. Over the years is has become more than apparent that when the salmon farm was active the numbers of sea trout plummeted and when it was fallow the numbers rose again – obviously only circumstantial evidence but fairly obvious to all who live, work and who's livelihood depends on the Lough that something is not right when the salmon farm is operating. Having witnessed the decline in the Scottish Wild Salmon population and the horrific reared fish husbandry and environmental consequences of salmon farming I am amazed that the project is even being considered appropriate for such a beautiful and pristine water !

As you may have gathered I am vehemently opposed to this proposal and think careful consideration should be given the economic ramifications of losing our tourist financial input which is far more sustainable and locally supportive than this salmon farm.

Yours faithfully,

[redacted]



**From:** [redacted]
**Sent:** Wednesday 7 February 2024 12:57
**To:** FinfishPC
**Subject:** Reference T06/202

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**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a lowebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12thOctober annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Regards,

[redacted]

From: [redacted]
Sent: Wednesday, February 7, 2024 1:33 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Submission/Observation re T06/202 Aquaculture Licence

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Dear Sirs,

I would like to add my objection to the proposed application for an Aquaculture Licence in the strongest possible terms.

I have been a regular visitor to Kerry and have fished Lough Currane for both sea trout and salmon since 1992. Given the logistics (travelling from overseas), each trip has tended to be for between four and ten days, sometimes flying to Cork or Kerry Airports or driving via Rosslare. Each trip contributes to the local/national economy in terms of my spending on travel, fuel, lodging, food, drink, fishing expenses (both ghillie and Licence) and I am delighted to do so.

Ireland is blessed in terms of its natural beauty and wildlife and, as a boy growing up in Northern Ireland, I marvelled that the salmon and woodcock would appear as images on the national coins. How special.

I cannot believe that we are contemplating granting a licence to an offshore fish farm that will, once again, have a catastrophic impact on so many resident and transient saltwater species through pollution and parasite spread. No country would contemplate a land-based farm that would have such a negative impact, with the secondary impact being that I, along with many other fishermen, will have to think long and hard about making an expensive trip to County Kerry should the sea trout and salmon stocks suffer once again.

Please think of the local businesses that benefit from fishing and of the many individuals who rely wholly or in part on fishing for their livelihood.

Please think of the wonderful wildlife that will suffer. They too need a voice.

Please look at the video footage (that is freely available) of the conditions in which salmon are raised and the negative effect that this has on the sea bed and any sea life that happens to swim nearby.

I trust you will reach the correct decision.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Wednesday 7 February 2024 14:15
**To:** FinfishPC
**Subject:** MOWI Salmon Farm Deenish Island Renewal Application Objection

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**FAO The Minister for Agriculture, Food and the Marine**.

**Objection to MOWI application to renew their Salmon Farm Licence at Deenish Island.**

My family & I have been regular visitors to Waterville Co. Kerry & more particularly the Salmon & Sea Trout fisheries of Lough Currane & the Inny river system, since the 1950's.

We have spent many thousands of punts & euros over that period staying in hotels & B&B's & using the services of local guides & boatmen, in pursuit of Salmon & Sea Trout.

Unfortunately & very sadly, our catches have diminished as to be almost non-existent & we have practiced "catch & release" this last 20 years or so.

Our visits have reduced to a fraction of previously & my family rarely come now as it is "hardly worth it".

The collapse in the runs of migratory fish have almost exactly coincided with the opening of the salmon farm at Devenish Island & now I understand that you are considering a licence to further expand the MOWI operation against all the irrefutable evidence of the harm it has done.

I object most strongly to this development & whilst I am not a resident of the Free State I live in the six counties & hold an Irish Passport & would like my voice to be heard.

It is not too late to reverse this tragedy if you act now.

Thank you.

[redacted]

From: [redacted]
Sent: Wednesday, February 7, 2024 2:22 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: MOWI licence renewal - Deenish Island, Ballinskellig Co Kerry.

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Sir,

Responding to your invitation to comment upon the renewal of the MOWI salmon farm licence at Deenish Island, I wish to register my strong objection to the continued operation of this facility.

My reason stems from many years fishing Currane and its related systems for sea trout. Currane was renowned as the premier sea trout fishery in Eire. It is now a shadow of its former self. Marked in recent years by a significant decline in mature sea trout and extreme sea lice infestation now commonly seen on returning juniors (juveniles). I believe photographs of such lice-ravaged juniors have been submitted over recent years by some of the Ghillies.
The decline and degradation of the the sea trout population coincides with the operation of the salmon farm. The sea trout live locally, the lice infestation is unavoidable. The collapse in their population is the result.
Returning wild Salmon appear to be less impacted by the lice. Understandable as they pass through, rather than reside in these coastal waters.
The broader impact upon the Waterville community of the collapsing fishery of Currane has been apparent over recent years. Was a time when fishermen from all over Europe would be on the lough and in the bars and restaurants. No longer is this the case. There are markedly fewer fishermen visiting now. At the guesthouse where I have always stayed, myself and two colleagues are the only fishermen the proprietor now sees.
The impact elsewhere in the village may be seen. The Fisherman's Bar in the famous Butler's Hotel closed several years ago. The back bar in the Lobster public house (a de-facto fisherman's bar as the decor would attest) is no longer host to many fishermen. Two restaurants have closed in recent years.
Whilst some of these changes are not be wholly attributable to the Salmon Farm operation, the devastation caused to the sea trout fishery and consequent decline in Waterville as a 'holiday destination' for fishermen has clearly had some detrimental impact upon the local economy. How many locals are employed by the Salmon Farm I wonder. Not many I'd guess.

Move the thing elsewhere - 50 miles out to sea I'd suggest!

Sincerely yours,

[redacted]

[redacted]

Sent from my iPad

**From:** [redacted]
**Sent:** Wednesday 7 February 2024 15:31
**To:** FinfishPC
**Subject:** Renewal of the salmon aquaculture licence for Deenish Island T6/202
**Attachments:** Letter of Objection by Dr. P Gargan to the renewal of Deenish Island aquaculture licence 7.2.24.docx

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I wish to lodge an objection to the renewal of the salmon aquaculture licence at Deenish island T6/202. Please find my letter of objection attached

Regards

[redacted]

Minister for Agriculture, Food and the Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre, Clogheen,
Clonakilty, Co. Cork.

Dear Minister McConalogue,

I wish to object to the renewal of the salmon aquaculture licence site at Deenish Island held MOWI, Site Reference T6/202.

I have been involved in scientific research into the impact of sea lice from salmon aquaculture in Ireland on sea trout stocks for over thirty years and have authored and co-authored over thirty scientific publications on the subject. The scientific evidence from Ireland is overwhelming that the operation of open net pen salmon aquaculture has resulted in the collapse of local sea trout stocks and more recently, scientific studies have demonstrated a clear impact of wild salmon stocks in salmon aquaculture bays. The operation of the salmon farms at Deenish Island and at Inishfarnard in Kenmare bay has resulted in a severe impact on the famous Waterville sea trout fishery as a result of sea lice infestation. The Waterville fishery is no longer viable as an angling tourist fishery such is the loss of the sea trout stock and a catch and release Bye-law was introduced in 2018 as a conservation measure.

My scientific experience largely relates to the impact of sea lice from marine salmon farming on wild salmonid stocks and I will confine my comments to that area at present. There are a significant number of scientific publications which demonstrate the potential negative impact of sea lice from marine salmon farms on wild salmonids and the findings of a selection of these publications are summarised below.

Extensive scientific research in Ireland has demonstrated that sea lice from marine salmon aquaculture has had a very detrimental impact of wild sea trout stocks. One of the largest studies undertaken on the Erriff river in Connemara (Gargan et al. 2016) analysed a 20 year time series (1985−2004) using 15 sea trout population response variables. Over this period, important life history changes were observed. The most dramatic of these changes corresponded with the period immediately after the commencement of salmon farming in the local estuary, with significant decreases in the number and length of sea trout kelts, the estimated number of eggs deposited, the sea trout rod catch, the proportion of older (1+ and 2+ sea age) fish and the frequency of repeat spawners. A significant positive relationship was found between the number of salmon lice in the local salmon farm and the number of lice found on sea trout collected contemporaneously in local rivers. Results of this long-term monitoring programme demonstrate that significant changes in sea trout population structure with respect to quantitative life history traits can occur over a relatively short time period and suggest that the introduction of salmon farming into the local estuary most likely contributed to the observed changes in sea trout population dynamics.

Previous studies in Ireland found a statistically significant relationship between lice infestation on sea trout and distance to the nearest salmon farm in Ireland over a 10 year

period, with highest infestations and variation in infestation seen close to fish farms (Gargan et al. 2003). Highest mean levels of total lice and juvenile (chalimus stages) lice were recorded at sites less than 20 km from farms. The mean total lice infestation was lower at sites less than 30 km from farms and beyond 30 km, very low mean total lice levels were recorded. Gargan et al. (2003) also examined the relationship between sea trout marine survival and the mean abundance of lice infestation in the sea trout population in 4 bays in western Ireland over the 1992−2001 period and showed a significant negative relationship between sea trout survival and the level of lice infestation.

Tully et al. (1999) 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. (2015) undertook a risk assessment of the effects of salmon lice on wild salmonid populations along the intensively farmed Norwegian coastline and found that sea trout from the majority of sampled sites had salmon lice infections, mainly resulting from salmon farming, which indicated moderate or high mortality risk of sea trout. 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.

Gargan et al. (2017) undertook an assessment of the increased mortality risk and population regulating effect of sea lice from marine salmon farms on wild sea trout in Ireland and Scotland. Sea trout with varying levels of sea lice infestation were sampled in Ireland since 1991 and in Scotland since 1997 and this sea trout time series were used to express observed sea lice infestation rates (number of lice per gram body mass (n $g^{-1}$)) at local and national scales in relation to the mortality risk thresholds used to assess potential impacts on wild salmonids of salmon aquaculture in Norway. Analysis of this large international sea trout dataset from Ireland (N = 7,461) and Scotland (N = 16,758) revealed levels of lice infestation on sea trout that imply increased mortality risk in the early years of monitoring in both countries. Lice loads on sea trout have reduced in recent years, likely reflecting improved lice control and changes in salmon farming practice. Population-level increase in risk of mortality or compromised sea water growth or reproduction, inferred from lice infestation rate, was estimated for individual sites. Results reveal that the likely sea trout population regulating effect of sea lice varied among locations; with many sites recording lice levels likely to result in strong population regulating effects over a prolonged period, particularly in the west of Ireland.

More recent scientific research in Ireland has shown that sea lice from salmon aquaculture can have significant consequences for local salmon stocks. Shephard & Gargan (2017) used a 26 year study from the Erriff River to evaluate the contribution of sea lice from salmon aquaculture to declining returns of wild 1 sea-winter (1SW) salmon. Statistical models suggested that returns were >50% lower in years following high lice levels on nearby salmon farms during the smolt out-migration. In a recent study of the impacts of sea lice from marine salmon farms on Irish Atlantic salmon populations, Shephard & Gargan (2020) examined annual counts of 1SW salmon from ten rivers in Ireland, including five “control” systems

without salmon aquaculture. Most counts showed a downward trend, consistent with declines in Atlantic salmon populations. Rivers with aquaculture showed lesser returns (mean 33%, range 19–46%) in years following high lice levels on nearby salmon farms.

Historically the levels of the salmon lice *Lepeophtherius salmonis* have not breached lice Protocol levels at sites in Kenmare bay on a regular basis. However, it is important to note that lice Protocol levels are arbitrary, have no direct association with potential lice level impacts on wild fish and are not related to the number of salmon on licensed sites. This has not been the case for the second sea lice species *Caligus elongatus,* a species which may also impact on salmon and sea trout smolts. It is therefore important that the potential impact of both sea lice species are taken into account in the assessment of risk with regard to licensing of salmon farm sites.

Sea trout populations in Ireland are not included under the EU Habitats Directive. However, Ireland's Strategic Plan for Sustainable Aquaculture notes that Ireland's National Biodiversity Plan includes a programme of measures aimed at meeting Ireland's biodiversity obligations including a commitment to halt biodiversity loss by 2020. Sea trout are listed in Ireland's biodiversity plan and the commitments in the national strategic plan for sustainable aquaculture development must include maintaining biodiversity with regard to sea trout populations. Salmon are a listed species under the Habitats Directive and there are two salmon rivers in Kenmare Bay which have salmon as a qualifying interest in their SAC, the Blackwater River (Kerry) SAC and Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC. The continued operation of the site at Deenish Island is likely to pose a threat to both sea trout and salmon stocks migrating in Kenmare bay and impact on the conservation status of both fish species.

It is clear from the scientific literature listed above from Ireland and elsewhere that a large body of international scientific publications demonstrate that sea lice from marine salmon farms can negatively impact wild salmon and sea trout. I therefore contend that the continued operation of the salmon aquaculture licence at Deenish Island will pose a danger to the long-term conservation of salmonid stocks in the Currane catchment and other Kenmare Bay rivers and the licence should not be renewed.

[redacted]
[redacted]
[redacted]
7/2/2024

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**From:** [redacted]
**Sent:** Wednesday 7 February 2024 16:04
**To:** FinfishPC
**Subject:** FW: Reference T06/202 Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry
**Attachments:** Objection to Salmon Farm Licence at Deenish Island, Co. Kerry.docx

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Regards
[redacted]

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**From:** [redacted]
**Sent:** Wednesday, February 7, 2024 3:47 PM
**To:** FinfishPC@agriculture.gov
**Subject:** Reference T06/202 Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

Dear Minister.
Please find my objection in relation to the above licence application for a Salmon Farm at Denish Island, Co. Kerry

[redacted]
[redacted]
[redacted]
[redacted]
07/02/24Date

Minister, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47

Reference: T06/202 Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

Dear Minister
I wish to strongly object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been decimated due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, while there were no salmon in the Deenish farm, the Waterville Sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, around 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm, the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natural Impact Statement submitted is inadequate, in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming because of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25% to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near future to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring. The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville.

Minister, please decline this licence application – remove the farm and you remove the problems.

Yours Faithfully,

[redacted]

**From:** [redacted]
**Sent:** Wednesday 7 February 2024 17:32
**To:** FinfishPC
**Subject:** MOWI Salmon Farm Deenish Island Renewal Application Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

**FAO The Minister for Agriculture, Food and the Marine**.

**Objection to MOWI application to renew their Salmon Farm Licence at Deenish Island.**

I have been a regular visitor to Waterville fishing on Loch Currane and the adjacent rivers over the last 25 years. I always stay in the area availing of the local shops , Resteraunts and other amenities . Unfortunately the serous decline of sea trout and salmon over that period has been alarming as well as avoidable and the fishing is now so poor it is not sadly now really worth making the trip.

All the evidence points to the collapse in the runs of migratory fish have coincided exactly with the opening of the salmon farm at Devenish Island & now I understand that you are considering a licence to further expand the MOWI operation against all the irrefutable evidence of the harm it has done.
They are also constantly in breach of quotas and other regulations and this has also to be taken into account .
I most strongly object to this licence being granted .

Here in Ireland the powers that be seem blind to the environmental catastrophe salmon farms cause to the environment all along the west coast. You will be aware the Norwegian Government stopped granting licences some years ago there and for a good reason - the appalling environmental damage they now know they cause.

Additionally the shocking conditions these migratory fish are held in is a scandal in itself .
If animals on land were held in comparable conditions where they could be seen it would be banned overnight .

I therefore hope that the science and common sense will prevail and the licence will not be granted .

Yours Faithfully ,

[redacted]

[redacted]

[redacted]

1 February 2024




The Minister for Agriculture, Food and the Marine,
National Seafood Centre,
Clogheen,
Clonakilty. Co. Cork
P85 TX47

**Ref: T06/202**
**Silver King Seafoods Ltd trading as Mowi Ireland**

Dear Minister,

I wish to object in the strongest possible terms to the application by the above (Mowi) to cultivate salmon at a site on the foreshore east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, in Co. Kerry.

Minister Michael Creed, in April 2019, ordered Mowi to cease operations from this site because of its breach of the terms of its licence. The breach related to gross over-harvesting in 2016 and the Minister referred to a 121% rise in harvesting over what was legally permitted by the licence at the site at that time. Mowi has thus shown its complete disregard for the rule of law in regard to its obligations under the terms and conditions of the previous licence on that site. This breach by Mowi clearly demonstrates that it has chosen to ignore those obligations with regard to levels of restocking, as well as care and maintenance of the surrounding marine environment. This has had a disastrous knock-on impact on the survival of wild salmon and sea trout stocks in the immediate area, and in particular Lough Currane, once famed nationally and internationally as a leading salmon and sea trout fishery.

It seems to me, based on the experience of other countries with salmon farming activities, that unless strict controls are exercised over the operations of salmon farming and a mandatory phasing out of open cage salmon farming enforced, there is a major risk of endangerment to the wild salmon and sea trout stocks, as well as, the destruction of the complex marine ecosystems due to infestations of sea lice, salmon farm escapees, proliferation of chemicals, toxins etc.

It is now almost eight years since the breach of the terms of its licence by Mowi and almost five years since Mowi was ordered by the Minister to cease operations at its salmon farm at Deenish. The appeal by Mowi against the Minister's decision is being considered by the Aquaculture Licence Appeal Board (ALAB). Meanwhile, am I to understand that Mowi continues to operate in breach of the terms of its licence to the continuing detriment of salmon, sea trout and the marine environment in Ballinskelligs Bay and Kenmare Bay? Should this be the case, it is outrageous.

Yours sincerely

[redacted]

From:
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to:

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]



From: [redacted]
Address: [redacted]

Date: 06/02/2024




To: Minister for Agriculture, Food and the Marine.

**Reference T06/202Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

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Aquaculture & Foreshore Management Division
Date: 06/02/2024
Department of Agriculture, Food & The Marine

From:
Address [redacted]

To: Minister for Agriculture, Food and the Marine.

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Signed [redacted]

Submission/Observation #0176 invalid in accordance with Regulation 9(2) of the Aquaculture (Licence Application) Regulations, 1998, as amended.

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre, Clogheen, Clonakilty, Co Cork
P85TX47
Or email to: FinfishPC@agriculture.gov.ie




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Signed [redacted]

①

5/2/24

[redacted]

Aquaculture & Foreshore Management Division
- 7 FEB 2024
Department of Agriculture, Food & The Marine

DEAR ~~MINISTER~~,

I AM WRITING TO YOU, IMPLORING UPON YOU TO REJECT MOWI'S APPLICATION FOR A LICENSE FOR THEIR SALMON FARM AT DEENISH ISLAND OF THE KERRY COAST.

[redacted] SINCE THE INTRODUCTION OF SALMON FARMING HERE IN THE MID 90'S, I HAVE SEEN A 90% REDUCTION IN SEATROUT NUMBERS. SALMON NUMBERS RETURNING TO LOUGH CURRANE HAVE ALSO SEEN A SIMILAR DECLINE. SCIENTIFIC EVIDENCE CLEARLY SHOWS THIS TO BE DIRECTLY ATTRIBUTABLE TO SEA-LICE INFESTED FARMS CONTAMINATING WILD SEATROUT AND SALMON SMOLTS WHEN THEY MIGRATE TO SEA.

THE PRACTICE OF OPEN PEN SALMON FARMING IS NO LONGER ALLOWED

(2)

IN MOWI'S HOME COUNTRY (NORWAY) AND SUCCESSIVE IRISH GOVERNMENTS HAVE GIVEN THIS HUGE MULTINATIONAL COMPANY (MOWI), WHO BY THE WAY IN A PUBLICITY PROPAGANDA MOVE CHANGED THEIR NAME A FEW YEAR'S AGO. SHAME ON ALL IRISH GOVERNMENTS WHO HAVE GIVEN THIS COMPANY FROM A NON E.U. COUNTRY PERMISSION TO COME HERE AND DESTROY OUR NATURAL ENVIRONMENT, AND DEVASTATE EMPLOYMENT IN OUR ONCE WORLD FAMOUS ANGLING INDUSTRY, WHICH IS SO IMPORTANT TO SMALL RURAL COMMUNITIES. IN FACT SALMON WERE ONCE SEEN AS SUCH AN ICONIC SYMBOL IN IRELAND THAT IT WAS ENGRAVED IN OUR CURRENCY. IRELAND COULD EASILY BE THE ANGLING PARADISE OF EUROPE IF YOU AND YOUR COLLEAGUES SHOWED THE SLIGHEST BIT OF FORESIGHT AND INITIATIVE. THE REVENUE THAT HAS BEEN

(3)

LOST TO SMALL RURAL COMMUNITIES LIKE WATERVILLE AND ALL A LONG THE WEST COAST OF IRELAND RUNS TO MILLIONS OF EURO'S, JUST TO SUPPORT A VERY ENVIRONMENTALLY UNFRIENDLY INDUSTRY. THAT IN REALITY CREATES VERY FEW JOBS. SO ONCE AGAIN I BEG YOU TO DO THE RIGHT THING AND REJECT THIS APPLICATION. IN SO DOING YOU WILL BE GIVING A LIFELINE TO OUR NATURAL ENVIRONMENT AND SMALL RURAL COMMUNITIES WHOM HAVE BEEN BADLY NEGLECTED BY ALL POLITICANS NOW FOR FAR TOO LONG.

YOURS THANKFULLY
LIVING IN HOPE

[redacted]

Aquaculture & Foreshore Management Division
- 7 FEB 2024
Department of Agriculture, Food & The Marine

[redacted]

February 5th 2024

To: Minister for Agriculture, Food and the Marine

Re: T06/202 Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

Dear Mr. McConalogue,

I strongly oppose the renewal of the Aquaculture/Foreshore License T07-202 Silver King Seafoods Ltd application, east of Deenish Island, Co. Kerry.

Let me state from the onset, I am not opposed to fish farming in general, and accept that it has become an important element in our food production and in solving food security for our over-populated planet. I also accept that in this modern era we live in it is not difficult to find fact based scientific research to support whichever side of a debate we choose to support. So, in this instance it comes down to whether the positive benefits of an off-shore net pen Fish Farm off the coast of Ballinskelligs outweigh the negative consequences. I put it to you that it is overwhelmingly the latter and with every fibre of my being I urge you to reject this application.

There are in practice throughout the world viable, sustainable, and profitable alternatives that are not only significantly less risky to both the producers and to the surrounding habitats but are more productive than off-shore net-pen fish farms.

According to a report published on Fishfarmingexpert.com one such company in Norway, Andfjord Salmon, which is developing a novel flow-through land-based fish farm on the island of Andøya in western Norway, reported that their method is "40% ahead of net pen fish". Biological conditions are excellent, leading to high growth, industry-leading survival rate, and an attractive feed conversion ratio. (See Appendix No.1)

It is widely accepted that there are a number of factors impacting on wild salmon and sea trout stocks. Some we can manage, some not. We have the power in our hands in this instance take a positive action and do the right thing.

It is now known that the fish farm off Deenish Island, at its current level of production, has had severely negative impacts on the local area from the onset. It opened in 1990. By 1992 high levels of sea lice were sampled. By 1993 there was a collapse of wild seatrout stocks. The farm closed in 2004 and by 2006 there was a significant increase in wild stock numbers. From then up to 2010 there were large stocks of spawning fish with fish of all age groups represented. The farm reopened in 2010 and by 2011, coinciding with high levels of production at Deenish and Inishfarnard, there was a radical decline in populations of seatrout of all ages with the virtual disappearance of spawning stock.

Apart from the negative consequences this has on the local eco-system, it is also felt throughout the community. Prior to the opening there was a thriving salmon and sea trout fishery on Lough Currane and surrounding lakes in Waterville. According to DiscoverIreland.ie "The rivers and lakes of Waterville drain a large catchment and are regarded by many as the foremost Salmon and Sea-Trout fishery in the country. The lake system is well developed with access to boats and guides being readily available to the tourist angler. The Sea-Trout caught here are renowned for their size and quantity." (Appendix No. 2)

The harsh reality, and a fact that local people are reluctant to voice too loudly lest they lose out on the dwindling tourism income left to them, is that the Waterville fishery is in virtual total collapse and with it are the local employment and revenue opportunities to Gillies, Bed & Breakfasts, Hotels, holiday rentals, transport companies, shops, gift shops, etc, not to mention airlines and the reputation of the Irish tourism industry at large. Up to the '90s Waterville had a vibrant tourism industry for nine months of the year, built up around its salmon & sea trout fishery. Today it is a ghostly shadow of itself, save for a couple of weeks at the peak of the summer season.

A way of life and a local community is sadly in decline and young people are becoming almost as scarce as the salmon & sea trout that once provided so much wealth (cultural and financial) to the area. And, although yes, the fish farm will support a few jobs, generally they are overstated and exaggerated due to increasing automation, and can never compensate for the employment opportunities lost to local community nor for the extent if its demise.

I do not trust Mowi. The facility located on Deenish Island lost its licence in 2019 under then-Agriculture Minister Michael Creed for allegedly harvesting twice the number of salmon permitted under its licence. Making the decision to strip the facility's licence, Mr Creed said that Mowi Ireland harvested 1,100 tonnes of salmon at the site, instead of the permitted 500 tonnes. He said this led to a rise in effluent discharge from the Deenish site.

They were fined NOK 3.7 million (€370,457/$450,732) by authorities in the Trondelag region of Norway for a March 2018 incident that saw 54,000 fish escape. Police officials in Trondelag issued the fines, citing violations of federal policies on escape prevention from aquaculture facilities. Mowi accepted the fine. (Appendix 3)

In 2021 they were sued in the US for false marketing. They settled the case for $1.3 million and agreed not to use the terms "sustainable" or "eco-friendly" in their advertising.

Mowi was fined more than $6 million in 2020 for an escape of 690,000 salmon in Chile. The watchdog stated that this constituted "irreparable environmental damage." They found Mowi had failed to maintain appropriate security standards and had used substandard equipment, and highlighted the risk to the marine habitat from "decomposing mortality" together with the transmission of pathogens and disease. (Appendix No. 4)

There are also many other practical issues to consider. Have you ever thought about what actually lurks beneath the surface of the water?

In 2023, monstrous blooms of parasitic sea lice and jellyfish were found plaguing the Scottish Coast during an unprecedented heatwave. The intensification of Salmon farming has led to the population explosion with catastrophic consequences. Salmon farms, containing hundreds of thousands of fish in foul cages create ideal conditions for sea lice to rapidly reproduce. Of course, sea lice are a natural parasite, but the difficulty arises when their larval numbers are increased by the presence of a large number of hosts on a fish farm with opportunity to develop large overall numbers of ovigerous (egg bearing) female lice. The crustations feed on the salmon's skin, mucus, and blood causing skin

lesions, loss of scales, secondary infection and ultimately death. With billions of lea slice inevitably making their way into the wider marine environment, migrating salmon and especially seatrout fall victim to this surge.

There was a similar outbreak of a toxic algae bloom in Bantry in 2021 in which Mowi, who own Silver King Seafoods Ltd, recorded losses of at least 80,000 salmon. (See Appendix No. 5).

In September 2023, Mowi Ireland announced it would cut 33 of its Irish staff. They had flagged difficulties at its Irish operations after warmer than normal sea temperatures impacted the amount of salmon fished in Ireland. The company said the warmer than normal temperatures impacted on the growth of its fish and hindered its projected salmon production for this year. They made no mention of the extent of casualties. Yet, absurd, and contradictory as it seems, they are applying for the license at Deenish Island to be renewed.

Climatologists are forecasting similar events happening more frequently. Surely yet again this raises serious questions about the viability of such an operation and the potential consequences for the local eco systems.

Extraordinarily high sea temperatures in 2023 led to waters around Ireland and the UK being classified as experiencing an extreme marine heatwave. This is likely to worsen, further impacting the welfare of millions of fish cramped in putrid sea cages. Algae blooms suck oxygen from the water and swarms of jellyfish have already been blamed for the doubling of farmed salmon deaths in Scotland in 2022.

An investigation commissioned by the Scottish Government in 2022, and carried out by the Marine Directorate concluded that "immediate impacts have been seen" and that "there is a continuing requirement to strengthen both practical (on-site) and regulatory regimes as a consequence of escapees mixing and interbreeding with wild stocks. (Appendix No.6)

In a region where climatologists are warning us of more frequent and more severe Atlantic Storms, surely the level of risk associated with an off-shore fish farm off Deenish Island must be called into question. In August 2020, Mowi Scotland has revealed that 48,834 salmon with an average weight of 4.2 kilos escaped when its farm at Carradale North broke free from its moorings during Storm Ellen and strong tides at Kilbrannan Sound. (See Appendix No. 7)

Escapees, which are becoming more common and which have led to Mowi receiving heavy fines in some countries, have become widely accepted as a consequence of off-shore fish farming. They generally occur during the transfer of fish in and out of farms, but also because of adverse weather conditions. In September 2023, TheGuardian.com (See Appendix No. 7) states that in Iceland "on 20 August, thousands of fish grown in pens from a Norwegian strain escaped. They have since been found upstream in rivers, endangering the wild salmon population."

The article goes on to say that the Iceland's Marine & Research Institute confirmed the farmed fish were found in multiple rivers. The article further states, "The escape – at a pen in Patreksfjörður owned by Arctic Fish, one of the country's largest salmon-farming companies, which is owned by Norwegian salmon giant Mowi – has reignited calls from environmentalists, sport fishers and some politicians to restrict or ban open-pen fish farming. It is not the first big escape: just last year, another salmon farming company, Arnarlax, was fined £705,000 for not reporting an escape of 81,000 fish in 2021."

As I see it, the five direct consequences to wild fish stocks at Deenish Island are;

1. The negative impact on the local community, culturally and economically;
2. The spread of lice, a parasite that can be lethal to wild fish;
3. The spread of Amoebic Gill Disease (AGD), a respiratory disease present at Deenish Island fish farm. This, like sea lice, divide exponentially on fish farms causing serious infection and high mortality rates. There is no known cure.
4. Escapees interbreeding with wild fish threatening the very survival of wild fish populations.
5. Untreated waste, suffocating the life out of the seabed below and in the surrounding area creating what is widely referred to as a "kill zone."

An editorial on the Irish Examiner website reporting on a 25-year research program conducted by Inland Fisheries Ireland, dated Jan 10th 2017 states "The research is objective and utterly credible. **It once and for all confirms that salmon farms have a negative, often lethal, impact on wild fish populations**." (See Appendix No. 8)

An article published on the Irish Times Website (See Appendix No. 9), makes for damning reading both for the off-shore fish farming industry but also for Mowi. The article states that, "Open-pen farms have been banned or heavily restricted in many countries, because of the environmental damage they cause. They have never been allowed in English or Welsh waters. They are banned in Denmark, Southern Argentina, and the Pacific states of the US: Alaska, Washington state and California. British Columbia is transitioning away from them. After a 10-year moratorium, they are now permitted in Chile, but not in protected marine areas.

Norway regulates them strictly, fining rule breakers. Licences for sea farms are expensive, while land-based farms are free. A production tax on output was recently introduced. This provides farmers with an incentive to expand overseas, where regulation is lighter.

Scotland is facing an increasing clamour for tighter regulation. Two recent applications for large farms have been refused."

In June 2022 Fair Seas published a report identifying sixteen areas for potential Marine Protection. (See Appendix No. 10) The South West Coast, including the waters around Deenish Island, was identified as a high biodiversity 'Area of Interest".

The granting of this license to continue operations at even current levels of production, has already had a serious negative impact on area. The gruesome reality of off-shore net-pen fish farming is a stomach-churning disaster. It would be like granting planning permission for a town without a sewage treatment facility thus contaminating and infecting its surrounding areas and in which there will be an accepted mortality rate within a couple of years of between a quarter and a third of its inhabitants, the rest of whom spend their entire lives inflicted by disease and infestation.

I strongly oppose this application and urge you not on our watch. Please to do the right thing and reject this license application.

Yours Sincerely,

[redacted]

Appendix


1. https://www.fishfarmingexpert.com/andfjord-salmon-feed-conversion-ratio-q1-2023/land-based-farmers-salmon-are-40-ahead-of-net-pen-fish/1525433

2. https://www.discoverireland.ie/kerry/waterville-lakes-river-system

3. https://www.intrafish.com/salmon/mowi-fined-450-000-for-salmon-escape/2-1-1008122

4. https://www.irishtimes.com/environment/climate-crisis/2023/01/26/why-are-open-pen-salmon-farms-encouraged-in-ireland-but-banned-in-many-other-countries/

5. https://www.intrafish.com/salmon/toxic-algae-bloom-causes-big-losses-at-mowi-ireland-salmon-farming-sites/2-1-1094592

6. https://www.gov.scot/publications/examination-levels-farm-wild-hybridisation-south-west-scotland-north-east-england-following-large-scale-farm-salmon-escape-event-2020/

7. https://www.fishfarmingexpert.com/carradale-escape-mowi-scotland/rope-break-blamed-as-mowi-puts-carradale-farm-escape-total-at-48834/1315967

8. https://www.irishexaminer.com/opinion/columnists/arid-20438374.html

9. https://www.theguardian.com/environment/2023/sep/30/thousands-of-salmon-escaped-an-icelandic-fish-farm-the-impact-could-be-deadly

10. https://fairseas.ie/2022/08/11/southwest-coast-area-of-interest-for-marine-protected-area-designation/

**From:** [redacted]
**Sent:** Thursday 8 February 2024 12:06
**To:** FinfishPC
**Subject:** T06/202

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I would like to add my voice to the opposition to the granting of a licence to the fish farm at deenish caherdaniel.[redacted] I appreciate the value to our community of the salmon and seatrout angling that has historically been one of the finest seatrout angling systems in western Europe. I have learnt the skills of fly fishing from a very young age and see it as a sustainable pastime close to nature. It would be better for this government to support this wonderful environment than to provide a licence to a huge multinational company with no regard for our environment our unique seatrout and our local economy. With this in mind I respectfully ask that you do not grant this license.
Sincerely [redacted]

**From:** [redacted]
**Sent:** Thursday 8 February 2024 13:21
**To:** FinfishPC
**Subject:** Deenish Island Salmon Farm

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I wish to state my objections to the proposed fish farm licence for Deenish Island fish farm off the coast at Waterville Co Kerry.

This license will allow salmon to be farmed in a bay that will have wild salmon and sea trout migrating to and from Lough Currane.

As you know sea lice levels around salmon cages are significantly higher than normal and will adversely affect wild fish stocks.

Currane was once the jewel in the crown for sea trout fishing and has been showing some signs of recovery but this decision will be the death knell for wild fish stocks and the tourism industry that depends on them.

Please revoke this license and save our wild sea trout and salmon.

Yours sincerely
[redacted]

The Minister for Agriculture, Food and the Marine 5th Feb 2024
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty
Co Cork
P85 TX47




Minister
REF: Aquaculture Licence Application T06/202

I object to the award of the above licence.
The application states that it is a request for a review and renewal of an aquaculture and foreshore licence.
The size and scope proposed are so far removed from the existing operation at Deenish Island (old licence 500T, new licence application 2200T) that this must be considered as a NEW APPLICATION.

A fish farm of the proposed scale and in this location, with the effluent, food and chemical waste that it will be produce and the collateral damage that will result are a threat to the wildlife and humans that frequent these environs above and below the surface.

The location is directly outside Derrynane Harbour. A very popular area for swimming and watersports
It is directly below the viewing area at Comakista on our pristine Wild Atlantic Way where there is a set of viewing binoculars so our tourists can get a closer look at the proposed eyesore.

Salmon and seatrout stocks have been decimated in Lough Currane since this fish farm started operating. The lice from the cages kill the young migrating fish which are attracted to the cages because of the

overspill of food. In the two years when the farm was fallow the stock of returning fish recovered significantly.
The lice are the biggest problem in this industry.
What method do Silver King Seafoods Limited/Mowi propose to use to control the lice on their salmon. Chemical or Cleaner fish or Hot water? All equally cruel.
Seatrout is a protected species. The department has a legal obligation to do everything it can to stop their complete disappearance and help stocks to recover. The granting of a licence for this proposal will only contribute to their further demise.

The employment that used to be generated by visiting anglers to this once world famous fishing area needing boats, gillies, accommodation and sustenance, outnumbers hundreds of times the amount of employment and economic benefit generated by what is an automated intensive force feed farming system the profits of which will go to the shareholders in a Norwegian company.

The applicants describe their operation that produces these fish as sustainable. It is fact that for every meal we get from farmed salmon it takes five equivalent meals to produce the fish. Protein is harvested from the sea off Africa to produce the feed. Protein that is no longer available to feed the people that live in that region.
Soya is grown on reclaimed land to make the fish food.
Farmed salmon is not sustainable.

A fish farm will not clean the sea around our shore. It can only pollute. NO level of new additional pollution can be tollerated.
If Mowi/Silver King want to farm salmon in Ireland in a fashion that does not damage Irish costal waters then they should consider a land based operation where the chemical used to control the sealice and the effluent can be filtered out and the risk of escapees is removed entirely. This is now considered best practice and the only type of licence issued in some countries where formerly salmon were farmed in sea cages.

There is no upside to Ireland in granting the award of this licence.
The opposite is the case.
Again, I would ask that this application is rejected

Yours,

[redacted]

**From:** [redacted]
**Sent:** Thursday 8 February 2024 18:20
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** TO6/202 xxxxxxxxxxxx
**Attachments:** OBJECTION T06202.pdf

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Good evening,
Please find attached signed copy of objection to Proposal T06/202 at Deenish Island, hard copy to follow in the post. Please acknowledge receipt of this email.
Yours sincerely,

[redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85TX47.

07 February 2024

**Objection to the Proposal T06/202, by Silver King Seafood, Mowi Ireland, Kindrum, Fanad, Letterkenny. Co Donegal for a Salmon Farm at Deenish Island, between Ballinskelligs Bay and Kenmare, Co. Kerry. (Called Deenish Island here for brevity)**

**Introduction;**

A proposal for a salmon farm at **Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry,** is currently under consideration.
The Irish government and statuary bodies have a history of not safeguarding our environment. This has been highlighted by the numerous times that environmental protective action has been taken by the Irish Government, only under the threat of fines and possible court action by the EU.
We are now at risk of this happening again.
I object to this application, and request that a salmon farm T06/202 at Deenish Island is not allowed for the following reasons:

- **Wild salmon at risk**
- **River Angling at risk**
- **Water quality at risk**
- **Wildlife at risk**
- **Shellfisheries at risk**
- **Tourism at risk**

Only in this way can the marine environment, protected species, local fishing and tourism jobs, be safeguarded.
Further concerns arise regarding the legislative framework for salmon farming licences in Ireland. A direct conflict of interest arises, as the same Minister that has set the salmon farming policy agenda has almost total control over all stages of aquaculture licence procedure, from approval to monitoring and policing.

**Wild salmon at risk**

The International Union for Conservation of Natures Red List of Threatened Species (IUCN) has moved The **Atlantic salmon** (*Salmo salar*) from Least Concern **to Near Threatened**, with new evidence showing the global population decreased by 23% between 2006 and 2020[1].Atlantic salmon are now restricted to a small portion of the rivers they inhabited a century ago across northern Europe and North America, due to multiple threats over the course of their long-distance migrations between freshwater and marine habitats.

[1] https://www.iucn.org/press-release/202312/freshwater-fish-highlight-escalating-climate-impacts-species-iucn-red-

***Threat from sea lice***

In the wild, salmon are perfectly adapted to cope with sea lice concentrations found in natural open ocean environments. However, in salmon farms sea lice build up to such an extent that the fish have to be treated with pesticides to stop them suffering such severe damage that they develop infections and die. In the west of Ireland, where salmon farms are near ubiquitous, young wild salmon (smolts) must migrate unprotected through dense clouds of sea lice and sea lice larvae. It is universally accepted that these lice are having a negative impact on wild salmon and sea trout populations.

Various scientific studies have examined the scale of this impact. What is clear is the sea lice emanating from salmon farms are significantly increasing mortality rates in juvenile salmon migrating out to sea. The young salmon, called smolts, are most vulnerable because of their size. Indeed, it only takes a couple of sea lice significantly impacting their potential survival. In turn, the numbers of adult salmon returning to spawn has dropped so drastically they're increasingly limited in their ability to sustain future generations.

This research highlights the need to separate salmon farms from wild salmon rivers to ensure wild salmon populations are not at risk of collapsing. It is for these reasons, that in 1994 a Report commissioned by the Minister of the Marine from the Sea Trout Working Group stated that until the precise nature of the relationship between sea lice and sea trout is understood '*a precautionary approach dictates that it would be prudent to avoid siting new fish farms or increased salmon farm production…within 20km of a sea trout river mouth*'.

Today, the situation is far from resolved. Salmon farms continue to be located much too close to wild salmon rivers with the result that local salmon and sea trout populations have been devastated.

While some progress has been made in the control of sea lice on some farms, these are often thwarted. Increasing disease incidence has affected fish appetite resulting in decreased ingestion of in-feed medication to control sea lice. Furthermore, increased resistance to treatment and warming seas are also favouring lice breeding.

***Threat from escapes***

A further threat to wild salmon comes from escaped farmed salmon. For a long time, it has been known '*escapees can have detrimental genetic and ecological effects on*

*populations of wild salmon. The present level of escapees is regarded as a problem for the future sustainability of sea-cage aquaculture'.*[2]

They spread disease and parasites, compete for food, and over-run redds.[3]

A further problem lies with inbreeding and genetic dilution. In the wild, salmon are loyal to a particular river, returning each year to spawn. Each river's salmon population has adapted over thousands of years to be perfectly in tune with that very environment. If escaped farmed salmon cross breed with wild populations they pose a significant threat to their gene pool. Farmed fish are designed to be aggressive feeders that grow fast. But, they're not used to dealing with predators, and don't have carefully attuned strategies for growth, maturity, timing of migration and resisting disease that relate to their local river.

Research shows escaped farmed salmon are just as fertile as their wild cousins, and identifies *'a clear threat of farm salmon reproduction with wild fish'.*[4]

The result of such inbreeding is reduced homing precision, survival, life span, and productivity of wild salmon populations.[5]

A further, and ironic impact of salmon farm escapes is they may inflate catch based spawning stock estimates to such an extent, that the stock appears either to be healthy or recovering, the consequences of which are that conservation measures are either relaxed or not strengthened, or new measures not being introduced.[6]

Such a situation has already been seen in Ireland with the collapse of sea trout in Connemara during the 1980s when salmon farming was introduced. [7]

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[2] Letter from Mark Costello to Minister Coveney, 10 May 2013 http://bantryblog.wordpress.com/2013/05/13/fie-press-release-13-may-2013-world-expert-warns-minster-on-sea-lice-cites-recent-incorrect-information-in-the-media/.

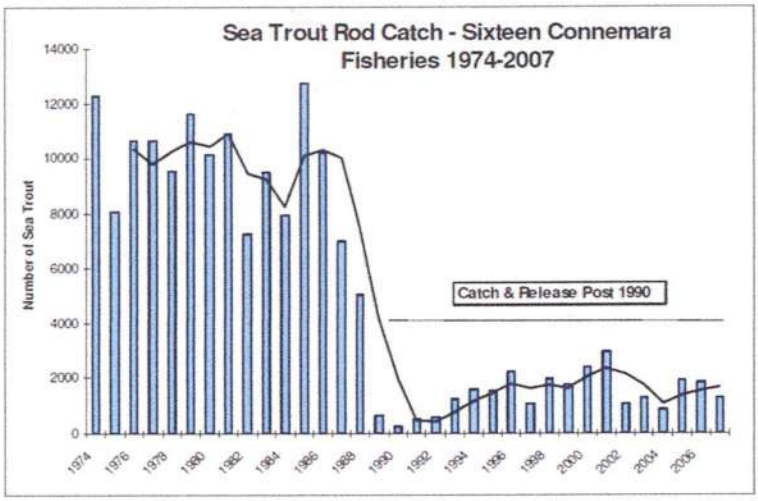
[3] Letter from Mark Costello to Minister Coveney, 10 May 2013 http://bantryblog.wordpress.com/2013/05/13/fie-press-release-13-may-2013-world-expert-warns-minster-on-sea-lice-cites-recent-incorrect-information-in-the-media/.

[4] Association of Salmon Fishery Boards, Statement on Sea Lice, 3 Feb 2013, http://www.asfb.org.uk/asfb-statement-on-sea-lice/

[5] M Krkosek, C W Revie, B Finstad and CD Todd; (2013) Comment on Jackson *et al.* 'Impact of *Lepeophtheirus salmonis* infestations on migrating Altantic salmon, *Salmo salar* L., at eight locations in Ireland with an analysis of lice-induced marine mortality', Published in Journal of Fish Disease, doi: 10.1111/jfd.12157.

[6] Jensen, Ø., et al. "Escapes of fishes from Norwegian sea-cage aquaculture: causes, consequences and prevention." Aquaculture Environment Interactions 1.1 (2010): 71-83.

[7] Krkosek. M et al. Impact of parasites on salmon recruitment in the Northeast Atlantic Ocean, Proc R Soc B Journal, 2012, http://rspb.royalsocietypublishing.org/content/early/2012/11/01/rspb.2012.2359




Open pen salmon farms are simply not environmentally or economically compatible with the thriving leisure river fishing industry, as highlighted by the 1994 Sea Trout Working Groups Report's recommendation of a 20 km distance between a salmon river and a salmon farm.

**Water quality at risk**

Salmon farms are known as a major source of biological and chemical pollution. A salmon farm at Deenish Island will discharge biological pollution in form of nutrients nitrogen and phosphorus.

Such is their devastating impact; the law requires all towns and cities to treat sewage, to remove these nutrients prior to discharge[8]. All other forms of industrial farming must also treat their waste, again to ensure water quality is maintained. It is known that nutrients phosphorus and nitrogen in fish farm waste can contribute to harmful algal blooms.

Chemical discharges also arise from the treatments used to control parasites and disease in salmon farms in Ireland.

[8] Fleming IA, Hindar K, Mjølnerød IB, Jonsson B, Balstad T, Lamberg A (2000) Lifetime success and interactions of farm salmon invading a native population. Proc Biol Sci 267:1517–1523

**Tourism at risk**

The Kerry and Cork coastlines are becoming more and more popular for tourists looking for a peaceful and unspoilt refuge. The locating of toxic salmon farms are certainly not welcome in such scenic and naturally pristine areas.

Yours sincerely

[redacted]

**From:** [redacted]
**Sent:** Thursday 8 February 2024 19:01
**To:** FinfishPC
**Subject:** [Marketing Mail] Renewal of licence T06-202 Silver King Seafoods

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Dear Sirs,

I would like to object to the renewal of the Aquaculture licence T06-202 for Silver King Seafoods Ltd. east of Deenish Island, Co. Kerry.

[redacted] and have witnessed the decline of the seatrout population on Lough Currane, first hand, since the opening of the salmon farm at Deenish Island in 1990, due to the high levels of sealice caused by the salmon farm. This is resulting in the seatrout dying prematurely at sea. [redacted] Waterville was always regarded as the premier seatrout fishery in Europe, but sadly that is not the case now. We saw an increase in the seatrout population when the salmon farm closed from 2004 to 2010. By the time the salmon farm reopened in 2010 the seatrout population had recovered. From 2011 onwards we saw a rapid decline of the sea trout again.

People are not coming seatrout fishing to this area now as they know there is a salmon farm operating at Deenish Island. This is resulting in a huge drop in revenue in the Waterville area as these anglers would be staying in the area and spending money in the hotel, guesthouses, restaurants, shops etc. [redacted]. I feel if this licence is granted it be the end of Waterville as a seatrout angling destination.

I hope you will take this into consideration when reviewing the above licence application.

Your faithfully,

[redacted].

**From:** [redacted]
**Sent:** Thursday 8 February 2024 19:12
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** I wish to make a submission with regard to the application of Silver King Seafoods Limited to cultivate salmon East of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry

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I have been visiting the Waterville area for [redacted] years and was originally attracted to the region with my father because it was known as a world-class sea trout fishery. More specimen sea trout were caught in Lough Currane than anywhere else in Ireland (and possibly the British Isles). There were 52 full-time ghillies employed helping fishermen on Lough Currane, and these fishermen also helped fill local hotels and restaurants, etc. and provided a lot of employment in the area. There are now only about half a dozen ghillies working part-time on the lake and any losses in fish stocks cannot possibly be regarded as being caused by overfishing in the Currane Lake and river system as on many days in the fishing season it is difficult to find more than one or two boats out fishing for sea trout or salmon. It is no longer an important sea trout fishery and attracts very few fishermen from afar, and I think that the main cause of the destruction of the fishery is the presence of the open-net salmon farm that is the subject of this application. Sea trout, unlike salmon, when they are in the sea do not stray great distances from their freshwater rivers, where they were raised as juveniles. They are attracted to local sources of food, not far from the river. In this case, the river is the Waterville River and the Deenish fish farm is within the feeding range of any sea trout leaving the Waterville River. Open-net fish farms are notorious for spreading diseases and sea lice to wild populations attracted to the open nets by food and wastes washed out from the salmon pens (it only takes a few minutes of research on the internet to come across numerous sources that demonstrate that fact).

[redacted]. I have spent a lifetime undertaking research in science, and so have some knowledge of good science and bad science ([redacted]). I consider there is overwhelming evidence that open-net fish farms can and do spread viruses (possibly other diseases) and sea lice from the fish farms to the wild fish that visit them attracted by food washed through the nets (in this case I believe that it affects both wild salmon and sea trout, but is more devastating to the sea trout because they do not leave for distant feeding grounds like Greenland to mature).

I have heard from locals in the Waterville area that the Deenish fish farm has not in the past been following the terms of its licence and has been raising more salmon than it is allowed to raise (by a factor of two or three). The more fish packed into those netted areas, the more disease and sea lice are likely to be spread into the wild fish outside the nets. There are few people employed in the fish farm, and I believe the fish farm causes far greater damage to the local economy in that part of Kerry than any benefit that it provides. It should be closed permanently, and the licence should not be renewed. I am listing below some of the websites that discuss the damage caused by such fish farms that anybody with a computer and any degree of ability to search the web can find in a few minutes. I judge most of them

to be scientifically sound and the evidence is unequivocal that such fish farms do tremendous damage to local wild fish (particularly salmonid) stocks. Sincerely, [redacted]

https://www.livingoceans.org/initiatives/salmon-farming/issues/pathogens-and-disease-open-net-pens-allow-free-exchange-pathogens

https://theconversation.com/fish-farms-transmit-viruses-to-endangered-wild-pacific-salmon-new-evidence-shows-158691

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8153721/

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8153721/

https://www.wildfirst.ca/research/

https://hakaimagazine.com/news/fish-farms-can-be-disease-accelerators/

https://www.seachoice.org/info-centre/aquaculture/disease-parasites-and-chemicals/

https://science.ubc.ca/news/salmon-virus-originally-atlantic-spread-bc-wild-salmon-farms

https://www.animal-ethics.org/diseases-suffered-fish-farms/

https://www.cbc.ca/news/canada/british-columbia/bc-salmon-virus-study-1.6041776

https://www.cbc.ca/news/canada/british-columbia/bc-salmon-virus-study-1.6041776

https://www.hsph.harvard.edu/news/features/as-fish-farms-proliferate-diseases-do-too/

https://davidsuzuki.org/story/suppressed-science-shows-fish-farms-endanger-wild-salmon/

https://www.livingoceans.org/initiatives/salmon-farming/issues/pathogens-and-disease-open-net-pens-allow-free-exchange-pathogens

**From:** [redacted]
**Sent:** Thursday 8 February 2024 20:05
**To:** FinfishPC
**Subject:** Public submission in reference to T06/202

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Public submission in reference to T06/202

There is overwhelming evidence gathered internationally, and locally in Scotland and in Ireland, that salmon farms in open water concentrate sea lice and lead to destruction of locally-feeding wild fish stocks. Inland Fisheries Ireland, an impartial steward of aquatic ecology, stated on their website:

"A definitive scientific paper, reviewing over 300 scientific publications, has just been published in the prestigious journal ***Aquaculture Environment Interactions*** on the effects of sea lice on sea trout stocks. A team of top international scientists from Norway, Scotland and Ireland reviewed all available published studies on the effects of sea lice and have concluded that sea lice have negatively impacted wild sea trout stocks in salmon farming areas in Ireland, Scotland and Norway."

https://www.fisheriesireland.ie/news/press-releases/salmon-farms-can-have-a-significant-impact-on-wild-salmon-and-sea-trout-stocks

Closing salmon farms in Scotland has led to the slow recovery of their native sea trout stocks. In his iconic book *Loughs of Ireland*, Peter O'Reilly refers to examples where salmon farms closed and the natural sea trout stocks rebounded.

The salmon farm off Deenish island provides a small but welcome number of jobs. However, the collapse of recreational angling on the Lough Currane system, on top of the ecological disaster, has severely impacted the local angling tourist industry. Ireland's reputation for ecosystem protection and for running a sustainable economy has been damaged, evidenced by open discussion on European angling bulletin boards about the collapse of the Lough Currane seatrout fishery.

In the home country of the commercial operator of the salmon farm, open sea pens are being replaced by facilities operated in tanks, on land. This also allows for containment and recovery of the waste biomass from the tanks as a fertilizer, in contrast to turning the whole operation into a lethal biohazard, as is in the case of the Deenish salmon farm in Ballinskelligs Bay.

I urge the Minister for Agriculture, Food and the Marine, Aquaculture to refuse this licence application, based on the overwhelming internationally accepted consensus interpretation of the scientific data.

Sincerely,

[redacted]

[redacted]

**From:** Audrey Ryder <Audrey.Ryder@fisheriesireland.ie> on behalf of Francis O'Donnell <Francis.O'Donnell@fisheriesireland.ie>
**Sent:** Friday 9 February 2024 12:29
**To:** FinfishPC
**Subject:** Submission re: public consultation on Deenish salmon farm licence application T06/202
**Attachments:** IFI submission on the application for review and renewal of the aquaculture licence T06-202 off Deenish Island.pdf

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**Subject:** Submission re: public consultation on Deenish salmon farm licence application T06/202

**To**: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co. Cork, P85 TX47

**Date**: 9th February 2024.

**From**: Francis O'Donnell, CEO, Inland Fisheries Ireland.

Please find attached IFI submission on the application for review and renewal of the aquaculture licence T06-202 off Deenish Island.

I wish to confirm that a hard copy of the application has been sent to your offices by courier.

Kindest regards,

Francis.

**Francis O'Donnell**
**Chief Executive Officer**
Francis.O'Donnell@fisheriesireland.ie • 0877213014 • 01 8842602 • www.fisheriesireland.ie • D24 CK66

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**Marine Finfish Unit**
**Aquaculture and Foreshore Management Division**
**Department of Agriculture, Food and Marine**
**National Seafood Centre**
**Clonakilty**
**Co. Cork**
**P85 TX47**
**9/2/2024**

**Re. Statutory Consultation - relating to the application for review and renewal of the aquaculture licence T06/202 off Deenish Island, Co. Kerry**

In accordance with Regulation 11 of S.I 236/1998 – Aquaculture (Licence Application) Regulations, 1998 (as amended), Inland Fisheries Ireland (IFI) as a statutory consultee wishes to make this submission relating to the application for review and renewal of the aquaculture licence T06/202 at Deenish Island, Co. Kerry.

Inland Fisheries Ireland (IFI) is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the conservation, protection and development of the inland fisheries resource and recreational sea angling. "Fisheries" includes all inland fisheries, recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts. IFI are the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities at sea out to 12 miles from baselines. IFI also has a research function which has inter alia conducted extensive research into the impacts of marine salmon farming on wild salmonids.

## 1. Background

According to the consultation documentation, the aquaculture licence renewal application for site T6/202 includes a request to:

1) amend the operating conditions attached to the licence; and
2) amend the boundary of the licenced area.

The existing licence has an annual harvest restriction of 500 tonnes and an allowable input of 400,000 fish. In 2012, a temporary amendment to the licence was granted for a *c*. two-year duration by the Aquaculture Licences Appeals Board (ALAB) to change the licence specification to input 800,000 smolts every second or every other year, i.e. the equivalent number (twice) of smolts as the yearly licence, but on a biennial basis and to replace the annual harvest tonnage to a maximum standing biomass as is appropriate to the smolt input number. A special condition of this amendment was that it, "is strictly a once-off pilot for this site only and that any repeat of the stocking pattern would have to be considered, inter alia, in light of the outcome of the monitoring and the progress of the implementation of overall licensing policy towards the use of "maximum standing stock biomass" as a control point in licence terms and conditions". For the aquaculture licence renewal application, the applicant is requesting that the operating conditions of the original licence change to allow a maximum allowable biomass (MAB) of 2,200 tonnes (biennial input of 650,000 smolts) if the environmental protocols show no detriment to the environment. The licence renewal application also requests that the boundaries of the licenced area be expanded around the existing site from *c*. 14.5 ha to 33.5 ha.

## 2. General comments

In general terms, IFI supports the sustainable development of the aquaculture industry in Ireland – the word sustainable is key and specifically encompasses sustainability of a development from an ecological as well as socio-economic point of view. From a wild fish perspective, IFI are particularly concerned that the marine salmon farming sector as currently operated in Ireland has the potential to negatively impact wild salmonids (Atlantic salmon and sea trout) and indeed, this has been well documented in numerous published studies in Ireland and elsewhere as set out herein. This is primarily through increased marine mortality due to sea lice infestation derived from open net salmon farms; and the risk of genetic introgression due to escaped farmed salmon interbreeding with wild salmon. Indeed, a comprehensive review of the literature on the impacts to wild salmon found that in farm-intensive areas mortality attributable to sea lice can lead to an average of 12−29% fewer salmon spawners and can negatively impact wild sea trout populations by increasing marine mortality, altering migratory behaviour, reducing marine growth and reducing population sizes (Thorstad *et al*. 2015). An additional concern of IFI is the need to ensure that any aquaculture development does not have a deleterious effect on other sectors in Ireland notably the valuable salmon and sea trout tourist angling sector which is estimated to have an expenditure in the region of €210 million to the All-Ireland economy and support 3,235 jobs in this sector (ECSSTAI 2015). Indeed, angling is tourism is estimated to contribute up to 0.15% of mean household income in the remote rural economy of the Waterville area alone (Curtis *et al*. 2017).

The operational record of the existing salmon farm at the Deenish site to date, does not provide any confidence that any future proposed operations will be conducted in full compliance with the licence conditions that may be granted. The site has previously been over-stocked and over-harvested outside its licence conditions. This resulted in the Minister for the Department of Agriculture, Food and Marine revoking the licence to operate the farm under Provisions of Section 68(1) and Section 19(a)4 of the Fisheries (Amendment) Act 1997. The Minister made a determination in May 2019 that a breach of a licence condition 2(e) had occurred whereby the operator 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 conditions. In addition to this, in 2017 there is evidence to show that the farm was stocked with 560,000 smolts which was over their licensed input of 400,000 smolts.

National and EU guidance documentation on the preparation of Appropriate Assessment (AA) Screenings, Natura Impact Statements (NISs) and Environmental Impact Assessments (EIAs) highlight the importance of making assessments and determinations based on the best scientific knowledge, evidence and methods. However, this has clearly not been achieved in the preparation of the consultation documentation to support the conclusions made. This is particularly notable in relation to assessing the potential impacts of increased sea lice loads associated with the proposed operations and potential farm escapes and their consequent potential effects to proximal salmon, sea trout and pearl mussel populations as well as the potential socio-economic effects that may result.

The following sections set out in detail IFI's specific concerns and highlights the deficiencies in the application for review and renewal of the aquaculture licence and as such, recommends based on this that the licence should not be granted.

## 3. Proposed production cycle

According to the consultation documentation, the proposal for the farm is to have a production cycle of 24 months long that includes fallowing which will operate under a policy of strict separation of generations, with an 'all in all out' model (fish are added to pens and there is no movement from time of entry to time of harvest) and no movement of fish during the grow-out phase. The production cycle at the site will be 24 months long beginning in March and includes fallowing of the site during the winter months of the second year (December – February) or a minimum of one month after harvest. The proposed fallowing period is

unclear in the consultation documentation. For instance, in *Section 2.1.11.4* of the *Screening for Appropriate Assessment and Natura Impact Statement Volume 1 – Main Report* the fallowing period is stated as, "the Deenish site will lie fallow for a minimum of one month following the completion of harvest." However, elsewhere including in the EIA *Volume 2 – Main Report* it is stated that the site will be fallow for three months at the end of the harvest period. The consultation documentation further states that the fallowing of the site at the end of harvest will see no smolts present at the site which will allow time for the marine environment to recover and rest between cycles and input of the next generation of smolts.

The consultation documentation states that it is intended that *c*. 650,000 smolts with an average weight of 75 g will be added to the pens in March at the beginning of the 24-month production cycle, that these will grow out to a *c*. mean weight of 2.5 kg in approximately 13-14 months post-transfer and thereafter, will be counted, graded and redistributed among the pens in preparation for harvest. In addition, the proposed site is projected to hold a maximum total biomass on-site of *c*. 2,200 tonnes at a peak stocking density of ≤10kg/$m^3$ of salmon with peak biomass occurring between June and July of Year 2 in each production cycle and the mean harvest weight is expected to range between 4.5 and 5.6 kg with harvesting taking place in the period July to December approximately 16 or 17 months after the smolts were initially transferred to the site.

The production cycle set out above will approach peak biomass from late spring to mid-summer which overlaps with wild salmonid smolt runs which typically occur from late March to early June. The biennial fallow period proposed from December to February (or for a "minimum of one month following the completion of harvest") will be of little benefit to wild salmonids as: 1) a fallow period immediately prior to and during the principal period of wild smolt runs over the March to May period is somewhat more likely to better protect wild fish from sea lice infestation emanating from the farm; and 2) there will be no such fallowing in year 2 of the production cycle. Harvesting will also likely take place in late summer which will impose increased sea lice infestation pressure on wild salmonids as fish will presumably be subjected to a period of starvation prior to harvest during this time. This starvation period will likely preclude chemical treatment, if high sea lice infestation levels warranting treatment are breached. With the efficacy of cleaner fish that may instead be present to control lice levels under such a scenario unclear, heightened sea lice levels may prevail and pose substantial risks to wild salmonids. IFI are particularly concerned that this has the potential to negatively impact wild salmonids (Atlantic salmon and sea trout) and indeed, this has been well documented in numerous published studies in Ireland and elsewhere as set out herein. It is also of particular concern to Ireland's under-threat sea trout stocks which commonly inhabit the coastal environment during their marine phase. Recent acoustic tagging data for sea trout smolts from the adjacent Currane catchment undertaken by IFI has shown that post-smolts utilise the waters around Deenish Island. Therefore, from a wild fish perspective, the proposed production cycle poses considerable threat to out-migrating wild salmon smolts and indeed, post-smolt and adult sea trout. Further observations in relation to the proposed operation are made in some of the following sections on the risk of sea lice associated with salmon farming to the continued sustainability of wild salmonids stocks.

A further point to note, is that the use of the term "biannual" in the consultation documentation in relation to the stocking of smolts is confusing and potentially misleading as it means that smolts will be stocked twice a year. This is at odds with the production cycle stated elsewhere.

**4. Deficiencies in sea lice modelling to assess risks to wild salmonids**

Modelling was undertaken to examine the transport and fate of farm origin lice which may be released from the proposed site of operation. The purpose of the modelling was to ascertain if farm origin lice were capable of reaching estuaries or migration routes in sufficient numbers to infest wild stocks. The numerical model utilised particle-tracking analysis to simulate the dispersal of the lice larvae from the farm sites. However, the fidelity of the model simulations to actual hydrodynamic conditions in Kenmare Bay are not satisfactorily conveyed. That is to say, to have confidence in the output of the model, it is essential to validate it against different observations. The model methodology as currently outlined in section 5.1 Appendix 7 is unlikely to

stand-up to standard scientific peer-review without major revisions. For example, the results from the hydrodynamic model are vaguely compared as “reasonable” to a single 1997 drogue survey yet it is also stated that the drogue releases were strongly influenced by winds that occurred specifically during that brief survey. Therefore, it is unclear how representative this is of year-round hydrodynamic conditions in Kenmare Bay, with variable (time-varying) wind conditions. Furthermore, drogue surveys are only representative of surface currents whilst figures of mid-depth and bottom current velocities are also shown without rigorous model validation. The minimum acceptable criteria for quantifying the accuracy of a hydrodynamic model would be to give at the very least some statistical quantification of model error (e.g. Root Mean Square Error & Mean Absolute Error) by comparing model simulations to *in-situ*- observations of water currents at different depths throughout the water column (e.g. observations obtained from an acoustic current profiler) and/or hydrographic properties (observations obtained from temperature/salinity profiles), carried out over meaningful time periods (seasonal and interannual). Without such statistical measures of model performance, it is not possible to objectively evaluate the accuracy of the hydrodynamic model described in the EIA and subsequently used to model lice dispersion. The statement in section 5.1 of Appendix 7 that: “The predicted hydrodynamics are considered to reasonably reproduce the mixing characteristics of the Bay and the [sic] generally reflect the moderately slack flow conditions at the mouth of Kenmare Bay" is unsubstantiated and not validated using any observational data. Finally, and perhaps most pertinently, the boundary conditions used to force the hydrodynamic model, which in turn was utilised to predict lice dispersion, did not use wind data (see section 2.2 Boundary conditions and section 4.1. under 4 Water Quality Dispersion Modelling – only tidal forcing (namely tidal elevation and velocities) were specified. Specific use of Valentia wind data only appears to have been used in section 3.3, to derive extreme wind conditions with a 50-year (or greater) return interval specifically for the purposes of assessing the exposure of the fish farm to damage from extreme wave events). **This is particularly troublesome when considering the ability of the model to simulate realistic lice dispersal in the region, as wind-driven surface circulation is the dominant influence on the dispersion of surface particles, including the distribution of sea lice, which tend to occur at depths of 0-4 m from the surface.** In addition, the particle tracking model used lice discharge at mid-cage depth (> 4m below the surface) which is unlikely to capture the primary mode of lice dispersion, which are typically constrained to surface layers. As shown in Figure 17 of Appendix 7, the predominant wind climatology in the region is comprised of winds coming from the south-southwest-west meaning that the primary direction of surface particle dispersion from the Deenish site would be landward and greatly increase the exposure of salmonid smolts leaving river mouths to sea lice infestation. This same concern also relates to other farm-related water quality issues (soluble pollutants, nitrogen, phosphorus & BOD), all of which may compromise nearshore water quality impacting migrating salmonids and other inshore biodiversity. Before any firm conclusions can be drawn about the insignificance of fish farm lice dispersals (e.g. section 3.5.3.3), a hydrodynamic model should be presented with appropriate quantification of model performance and incorporating realistic wind-driven surface currents in this region. Some examples of the requisite scientific rigour associated with executing and validating such lice-dispersal models (and highlighting the requirement for wind-forcing data) include: Gillibrand and Willis (2007); Amundrud and Murray (2009); Salama *et al*. (2018); Skarðhamar *et al*. (2018); Asplin *et al*. (2020); Cantrell *et al*. (2021); and Murray *et al*. 2022.

Furthermore, the fundamental premise of the particle-tracking model assumes that sea lice particles are passive (“treated as passive particles being advected and dispersed by the ambient currents”), where in reality they are not. Sea lice exhibit a vertical movement in the water column and therefore, consideration of the vertical position of sea lice in the water column is necessary in order to simulate realistic lice dispersal. It is known that sea lice in the water column can avoid freshwater layers, move towards host fish, away from predators and are attracted to light near the surface during the day and sink away from the surface during the night. It is important to consider the active vertical behaviour of sea lice in the water column as a component of any model as it will influence dispersal where typically currents are not uniform across the water column. Assuming that sea lice are passive particles is an incorrect assumption to make and thus compromises the output of the sea lice particle tracking simulations in providing an accurate reflection of their potential dispersal in the wider area (Murray *et al*. 2022). Indeed, the EIA *Section 6.5.3. Sea Lice* states,

"Copepodids have limited strategies to assist in seeking out hosts. They can dart by up to 10cm on sensing a passing host fish. They may also be able to adjust their position in the water column, sinking towards the seabed in response to the ebbing tide (geotaxis), to assist in maintaining their position and population density, close to estuaries and inshore margins, through which their target hosts migrate". Further to this, **no specific consideration was given to the potential migration routes and residence areas of salmon and sea trout in the wider area around the proposed operations** which is a key consideration when assessing potential impacts on wild salmonids from increased sea lice loads associated with the salmon farm.

**5. Concerns and deficiencies in regard to proposed sea lice monitoring**

In Section *3.8 Mitigation* in the *Screening for Appropriate Assessment and Natura Impact Statement Volume 1* it is stated that, "Habitats Directive Annex II Species salmon maybe [sic] affected by the proposed farm through lice infestation, disease spread and the introduction of therapeutants…. the breaking of disease and parasite life cycles with the effect of enhancing the efficacy of lice control and reducing the overall incidence of disease in the stocks and the use of therapeutants, thereby reduces) risks to wild population of salmon."

The consultation documentation sets out the envisaged sea lice monitoring and control protocols for the proposal which is based on the standard existing lice monitoring and control protocols used already in salmon farms in Ireland with some minor additional sampling proposed by the applicant. The code of practice for this pest control is not, in the view of IFI, adequately robust to ensure the protection of wild sea trout and salmon smolts from sea lice emanating from the salmon farm. The applicant is requesting a licence for a substantial increase in existing salmon farm production over the original licence and therefore, we consider that the total level of stocking and production should be the key consideration when assessing lice loads in relation to determining treatment trigger levels in the context of their consequent risks to wild salmonids rather than using an average measure of lice levels on the farmed salmon to make such determinations. The North Atlantic Salmon Conservation Organisation (NASCO) developed 'Guidance on Best Management Practices to address impacts of sea lice on wild salmon stocks' in 2009 (NASCO 2009). This guidance was intended to supplement previous NASCO resolutions and to assist the Parties and jurisdictions in managing salmon aquaculture. The NASCO international goal is that *100% of farms are to have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farms*. This is not clearly demonstrated in the consultation documentation. Ireland is a member of NASCO through its membership of the European Union and is required to demonstrate progress at achieving this international goal through setting out specific associated actions in five-year Implementation Plans, the progress and achievement of which is reported on *via* Annual Progress Reports. Indeed, the guidance notes that, "Lice control management programmes" should be "appropriate to the number of fish in the management area". Further to this, the review of Ireland's Implementation Plan found that the standard existing lice monitoring and control protocols used already in salmon farms in Ireland to attempt to fulfil the NASCO goal is, "is not specific in protecting wild salmon" and "it is not clear…how this action will enable progress towards achievement of the goals for effective sea lice management" to ensure wild salmonids are protected. Indeed, we consider that to properly evaluate ongoing risks to wild salmonids, a sampling programme focused on wild salmonids in the vicinity of fish farms would be a necessary approach to comply with these NASCO obligations and focusing solely on the lice levels in farms and inadequate fallowing periods is wholly insufficient in this regard. This is supported in the review of the Implementation Plan which "recommended that such monitoring also takes place on wild salmonid populations", as also outlined in NASCO goals.

**6. Concerns and deficiencies in regard to proposed use of chemicals and cleaner fish for lice treatment**

In *Section 2.1.13.2.1 Treatments* in the *Screening for Appropriate Assessment and Natura Impact Statement Volume 1 – Main Report* (and the corresponding section in the EIA), the main focus of sea lice control treatments is the use of cleaner fish sourced from wild caught wrasse from Kenmare Bay and hatchery reared lumpfish with such cleaner fish intended to be deployed from the first June post transfer at a ratio of 7 cleaner fish per 100 salmon which are to be further supplemented with locally caught wrasse during summer months.

With a stocking abundance of 619,250 salmon in the first June as stated in the proposed production cycle, this equates to in the region of 43,000 cleaner fish at the proposed ratio of 7 cleaner fish per 100 salmon. However, elsewhere in the consultation documentation, it is stated that, "This will involve the stocking of hatchery-reared wrasse and lumpsucker at a rate of 6% of the salmon pen population", which equates to 619,250 @ 6% = 37,155 cleaner fish. The EIA states that, "It is MOWI's objective to have 100% supply of hatchery-reared cleaner fish available to all sites by 2021". It is unclear whether this has been achieved by MOWI and is at odds with the intentions stated for the proposed operations to also use locally-caught wild wrasse for sea lice control. Data from 2017 report that 25,361 wrasse were introduced as cleaner fish at the Deenish island site for sea lice control purposes; and at its sister salmon farm, Inishfinnard, between 2016 and 2018, 48,619 wrasse were introduced. The potential consequences of using wrasse harvested from the wild as cleaner fish in salmon aquaculture is highlighted in the draft National Strategic Plan for Sustainable Aquaculture Development 2030 and its associated SEA Environmental report and Natura Impact Statement as an ongoing concern. IFI have serious concerns regarding the impact to marine ecosystems from the stated intention of removing large numbers of locally-caught wild wrasse for extensive use as cleaner fish for the Deenish operation including in regard to any potential knock-on impacts to biodiversity, qualifying features and indeed recreational fisheries. No such assessment on this matter appears to be made in either the NIS or EIA and no scientific stock assessment on the current status of the wild wrasse population to ascertain whether the rates of intended harvest would be sustainable was presented

Further to the above, in Table 2.7 of both the NIS and EIA, it is noted that SLICE has been used in either two or three years at the site in the period 2010-2018. However, this cannot be established as there is an apparent error in the years in the final row of the table. Indeed, it is unclear whether SLICE has been used more recently to this at Deenish Island operation and no more up to date information was presented in relation to this in the consultation documentation.

**7. Deficiencies in assessment of potential impacts of sea lice associated with the farm on wild salmonids**

IFI have specific concerns in relation to the lack of sufficient consideration given in the EIA and NIS to the issue of potential impacts of sea lice associated with salmon farming on wild Atlantic salmon and sea trout stocks and consider that this is not at all adequately assessed in either document. The consultation documentation states that, "Evidence suggests that sea lice induced mortality has an impact on Atlantic salmon returns, which may impact the achievement of conservation limits in salmon rivers" and concludes that, "Consequently it can be concluded that the proposed operations at the site are unlikely to result in significant impact in sea lice infestations in wild salmon populations; consequently there will be no likely significant direct effects to the Qualifying Feature salmon and no likely significant indirect effects to the Qualifying Feature freshwater pearl mussel" principally as a result of the proposed mitigation measures to control sea lice on the farm. IFI consider that the consultation documentation provides a very limited, unbalanced and wholly inadequate synopsis and evaluation of the extensive relevant peer-reviewed and published scientific literature available, the vast majority of which support that sea lice emanating from fish farms have the potential to be detrimental to wild salmonids stocks. Due to the potential consequences for the sustainability of wild salmonid stocks in the region around the proposed operation, many of which are in a vulnerable state, it is recommended that comprehensive evaluation of the extensive evidence already available should have been undertaken.

The consultation documentation primarily relies on selected extracts from the eight-year-old ICES (2016) WKCULEF report to support the conclusions made. There is a paucity of critical or objective appraisal apparent in the context of the wider literature now available in order to make a comprehensive, more balanced and objective assessment of the potential effects on wild salmon stocks from increased sea lice loads that may arise as a consequence of the proposed farm operation. Indeed, the ICES (2016) WKCULEF report also states that it is, "also true that a small incremental increase in marine mortality due to sea lice (or any other factor) can result in losses of salmon abundance that are relevant for fisheries and conservation management". Furthermore, the consultation documentation relies heavily on Jackson *et al*. 2013 through

its citations in the ICES (2016) WKCULEF report as its principal source to provide doubt as to the impacts of sea lice associated with salmon farming on wild salmon stocks. Indeed, Krkošek *et al*. (2014) [Comment on Jackson *et al*. 'Impact of *Lepeophtheirus salmonis* infestations on migrating Atlantic salmon, *Salmo salar* L., smolts at eight locations in Ireland with an analysis of lice-induced marine mortality' *Journal of Fish Diseases*] noted that there are methodological errors in the Jackson *et al*. (2013) paper which contented that sea lice play a minor, perhaps even negligible, role in salmon survival. Krkošek *et al*. (2014) states, "Our foregoing re-analyses depart substantially from those reported and interpreted by Jackson *et al*. (2013), and in their previous publications that utilized the same data (Jackson *et al*. 2011a,b). Whereas they assert that sea lice cause 1% of mortality in Atlantic salmon, the correct estimate is actually a one-third loss of overall adult recruitment. To further illustrate, if, in the absence of parasites, final adult recruitment is 6% of smolt production, then the effect of parasite mortality reduces that recruitment to 4%. According to interpretations used by Jackson *et al*. (2013), that is a change of 2%, which we agree is a small number. However, the realized effect is that it reduces the abundance of adult spawners returning to a river from, say, 6000 down to 4000; this one-third loss of salmon returns could have significant conservation or fishery implications". Indeed, Jackson *et al*. (2013) in their own paper did find that sea lice-induced mortality on outwardly migrating smolts can be significant, and found an odds ratio of 1.14:1, which equates to a 12.3% decrease in returning adult salmon due to sea lice infestation from local salmon farms.

In the Irish context, a number of key studies on the impact of sea lice from marine salmon farms on wild salmon have been published. In a study in the Erriff river, Gargan *et al*. (2012) demonstrated that hatchery salmon smolts treated against sea lice infection were 1.8 times more likely to return than control fish, with a 44.4% mortality of untreated salmon. The results suggested that sea lice induced mortality can significantly negatively impact adult salmon returns and that sea lice larvae emanating from salmon farms may influence individual survivorship and population conservation status of wild salmon in Irish rivers. Shephard and Gargan (2017) used a 26-year record from the Erriff River to evaluate the contribution of sea lice from salmon aquaculture to declining returns of wild one-sea-winter (1SW) salmon. Statistical models suggested that wild salmon returns were >50% lower in years following high lice levels on nearby salmon farms during the smolt out-migration. Shephard and Gargan (2020) showed that wild Atlantic salmon exposed to sea lice from aquaculture in Ireland had a reduced marine survival and modified response to ocean climate. Annual counts of 1SW fish were studied from ten rivers in Ireland, including five "control" systems without salmon aquaculture. Rivers with aquaculture showed lesser returns (mean 33%, range 19–46%) in years following high lice levels on nearby salmon farms. These published studies in Ireland contradict the conclusions in the NIS and EIA that farm origin lice are very unlikely to impact on wild salmon smolts migrating through areas of salmon aquaculture and further highlight the wholly inadequate assessment made in the consultation documentation to reach the conclusions made that significant impacts are unlikely.

A synopsis of some of the relevant published peer-reviewed literature to support the potential for impacts of increased sea lice loads associated with salmon farming on migratory salmonid stocks is provided below. Although not a qualifying species under the Habitats Directive, the additionally presented studies focusing on sea trout are also relevant to provide an indication of the likely potential effects to wild salmon due to their similar biology and life histories as salmon, and indeed sea trout may be particularly susceptible to such effects as they typically inhabit the coastal environment during their marine phase.

- Shephard, S. and Gargan, P. (2021). System-specific salmon louse infestation thresholds for salmon farms to minimize impacts on wild sea trout populations. *Aquacultural Environment Interactions*, 13: 377-388.

  Main finding: **Salmon farm louse production in spring can have a strong system-specific regulating effect on wild sea trout populations.** Regulations relying on a generic louse threshold to trigger treatment are not sufficient to protect sea trout populations — stocking density and site characteristics must be considered to evaluate system-specific infestation pressure and impacts on wild salmonids.

- Shephard, S. and Gargan, P. (2020). Wild Atlantic salmon exposed to sea lice from aquaculture show reduced marine survival and modified response to ocean climate. *ICES Journal of Marine Science,* 78: 368–376.

  Main finding: Examined annual counts of on-sea-winter salmon from ten rivers in Ireland, including five "control" systems without salmon aquaculture. Most counts showed a downward trend, consistent with declines in Atlantic salmon populations. **Rivers with aquaculture showed lesser returns (mean 33%, range 19–46%) in years following high lice levels on nearby salmon farms.**

- Gargan, P.G., Shephard, S. and MacIntyre, C. (2017). Assessment of the increased mortality risk and population regulating effect of sea lice (*Lepeophtheirus salmonis*) from marine salmon farms on wild sea trout in Ireland and Scotland. In: (Harris, G, ed.) Sea Trout: Science & Management. Proceedings of the 2nd International Sea Trout Symposium, pp. 507–522.

  Main finding: Undertook an assessment of the increased mortality risk and population regulating effect of sea lice from marine salmon farms on wild sea trout in Ireland and Scotland in relation to the mortality risk thresholds used to assess potential impacts on wild salmonids of salmon aquaculture in Norway. Analysis of this large international sea trout dataset from Ireland and Scotland revealed **levels of lice infestation on sea trout that imply increased mortality risk in** the early years of monitoring in both countries. Lice loads on sea trout have reduced in recent years, likely reflecting improved lice control and changes in salmon farming practice. **Results reveal that the likely sea trout population regulating effect of sea lice varied among locations; with many sites recording lice levels likely to result in strong population regulating effects over a prolonged period, particularly in the west of Ireland.**

- Shephard, S. and Gargan, P.G. (2017). Quantifying the contribution of sea lice from aquaculture to declining annual returns in a wild Atlantic salmon population. *Aquacultural Environment Interactions*, 9: 181–192.

  Main finding: A 26-year study from the Erriff River to evaluate the contribution of sea lice from salmon aquaculture to declining returns of wild one-sea-winter salmon. Statistical models suggested that **returns were >50% lower in years following high lice levels on nearby salmon farms** during the smolt out-migration.

- Gargan, P.G., Kelly, F.L., Shephard, S., and Whelan, K.F. (2016). Temporal variation in sea trout (*Salmo trutta* L.) life history traits in the Erriff river, Western Ireland. *Aquacultural Environment Interactions*, 8: 675–689.

  Main findings: analysed a 20 year time series (1985−2004) using 15 sea trout population response variables. Over this period, important life history changes were observed. **The most dramatic of these changes corresponded with the period immediately after the commencement of salmon farming in the local estuary, with significant decreases in the number and length of sea trout kelts, the estimated number of eggs deposited, the sea trout rod catch, the proportion of older (1+ and 2+ sea age) fish and the frequency of repeat spawners**. A significant positive relationship was found between the number of salmon lice in the local salmon farm and the number of lice found on sea trout collected contemporaneously in local rivers.

- Shephard, S., MacIntyre, C., and Gargan, P.G. (2016). Aquaculture and environmental drivers of salmon lice *Lepeophtheirus salmonis* infestation and body condition in sea trout (*Salmo trutta* L.). *Aquacultural Environment Interactions*, 8: 597–610.

  Main findings: 25 year dataset was collated comprising lice counts from > 20 000 sea trout sampled from 94 separate river and lake systems in Ireland and Scotland at varying distances from marine salmon farms. **Sea trout captured closer to salmon farms had significantly higher levels of lice infestation, and that this effect was exacerbated in warmer years. Sea trout sampled closer to salmon farms also had significantly reduced weight at length (impaired condition), with the strongest impact in dry years.**

- Gargan, P.G., Forde, G., Hazon, N., Russell, D.J.F. and Todd, C.D. (2012). Evidence for sea lice-induced marine mortality of Atlantic salmon (*Salmo salar* L.) in western Ireland from experimental releases of ranched smolts treated with emamectin benzoate. C*anadian Journal of Fisheries and Aquatic Sciences*, 69: 343–353.

Main findings: **Hatchery salmon smolts treated against sea lice infection were 1.8 times more likely to return than control fish, with a 44.4% mortality of untreated salmon.** The results suggested that sea lice induced mortality can significantly negatively impact adult salmon returns and that sea lice larvae emanating from salmon farms may influence individual survivorship and population conservation status of wild salmon in Irish rivers.

- Krkošek, M., Revie, C.W., Gargan, P.G., Skilbrei, O.T., Finstad, B. and Todd, C.D. (2013). Impact of parasites on salmon recruitment in the Northeast Atlantic Ocean. *Proceedings of the Royal Society B*, 280: 20122359.

  Main findings: A meta-analysis concerning the influence of parasitism by crustaceans on the marine survival of Atlantic salmon. The data include 24 trials in which tagged smolts (totalling 283 347 fish; 1996–2008) were released as paired control and parasiticide-treated groups into 10 areas of Ireland and Norway. All experimental fish were infection-free when released into freshwater, and a proportion of each group was recovered as adult recruits returning to coastal waters 1 or more years later. Treatment had a significant positive effect on survival to recruitment, with an overall effect size (odds ratio) of 1.29 that corresponds to **an estimated loss of 39 per cent of adult salmon recruitment**.

- Gargan, P.G., Tully, O. and Poole, R. (2003). The Relationship Between Sea Lice Infestation, Sea Lice Production and Sea Trout Survival in Ireland, 1992-2001. In: *Salmon on the Edge* (ed. D. Mills), pp. 119–135. Blackwell Science, Oxford, UK.

  Main findings: Found a statistically significant relationship between lice infestation on sea trout and distance to the nearest salmon farm in Ireland over a 10 year period, with highest infestations and variation in infestation seen close to fish farms and showed that **sea lice associated with salmon farming can affect sea trout stocks up to 30km from the farms.** It **showed a significant negative relationship between sea trout survival and the level of lice infestation. The results indicated that sea lice from marine salmon farms were a major contributory factor in the sea trout stock collapse observed in aquaculture areas in the west of Ireland.**

- Tully, O. Gargan, P.G., Poole, W.R., and Whelan, K.F. (1999). Spatial and temporal variation in the infestation of sea trout (*Salmo trutta* L.) by the caligid copepod *Lepeophtheirus salmonis* (Kroyer) in relation to sources of infestation in Ireland. *Parasitology* 119: 41−51.

  Main findings: **demonstrated that the presence of salmon farms significantly increased the level of sea lice infestation on sea trout post smolts in Ireland**.

- Thorstad, E.B., Todd, C.D, Uglem, I., Bjørn, P.A, Gargan, P.G, Vollset, K.W., Halttunen, E., Kålås, S., Berg, M. and Finstad, B. (2015). Effects of salmon lice *Lepeophtheirus salmonis* on wild sea trout *Salmo trutta*—a literature review. *Aquacultural Environment Interactions*, 7: 91–113.

  Main findings: **An international review of over 300 papers. In an extensive review of the impacts of the salmon louse on sea trout, it was 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. This review paper also reviews literature on the impacts to wild salmon and finds that mortality attributable to salmon lice can lead to an average of 12–29% fewer salmon spawners.**

  The studies reviewed demonstrate 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. The effects of salmon lice on sea trout include increased marine mortality, changes in migratory behaviour, reduction of marine growth of individual fish, and reduced population sizes. These conclusions are based on:

(1) Studies of salmon lice impacts on individual sea trout in laboratory and field studies documenting host tissue damage, osmoregulatory dysfunction and other physiological stress responses, reduced growth, and increased susceptibility to secondary microbial infections and reduced disease resistance.

(2) Documentation of premature return to fresh- water of sea trout carrying high levels of salmon lice. Premature return may facilitate individual survival and recovery from infestation in the short term, but does compromise growth potential, and thereby future fecundity, as well as impairing the immune defence system;

(3) Catch statistics and routine population monitoring utilizing in-river traps that have indicated changes in population abundance, age structure and altered life history characteristics in association with the onset and development of salmon farming in the adjacent environment;

(4) Monitoring of salmon lice levels on wild fish in relation to spatiotemporal variation in salmon farming intensity and biomass production;

(5) Indications of population-level effects on sea trout derived from monitoring of salmon lice levels on wild fish in relation to experimentally determined threshold levels known to induce physiological compromise and mortality of individual fish.

- Thorstad. E.B. and Finstad, B. (2017). Impacts of salmon lice emanating from salmon farms on wild Atlantic salmon and sea trout. Norwegian Institute for Nature Research (NINA), 13 pp. https://wildfish.org/wp-content/uploads/2022/06/Thorstad-Finstad-2017-Summary-of-impacts-of-salmon-lice.pdf

  Summary: "Results from scientific studies on the impacts of salmon lice on Atlantic salmon and sea trout are summarized here. Considerable evidence exists that that there is a link between farm-intensive areas and the spread of salmon lice to wild Atlantic salmon and sea trout. **Several studies have shown that the effects of salmon lice from fish farms on wild salmon and sea trout populations can be severe, ultimately reducing the number of adult fish due to salmon lice induced mortality, resulting in reduced stocks and reduced opportunities for fisheries. Depending on the population size, elevated salmon lice levels can also result in too few spawners to reach conservation limit**."

In addition to the above, the prevalence of another fish louse *Caligus elongatus* in this area and its impact on wild and farmed salmon and wild sea trout is another risk factor for wild salmonids. Research activity on *C. elongatus* , in relation to its impact on wild salmonids in marine waters, which is challenging to investigate due to the parasite's life history and mobility, is increasing. Nonetheless, the precautionary principle should apply given the risks posed by the presence of a likely *C. elongatus* reservoir in the form of a large marine finfish installation.

As stated previously, IFI consider the EIA and NIS provide a very limited, unbalanced and wholly inadequate synopsis and evaluation of the extensive relevant peer-reviewed and published scientific literature available, some of which is presented above. In the *Screening for Appropriate Assessment and Natura Impact Statement Volume 1,* it is stated that its purpose, "is to provide the competent authority (DAFM) the necessary information required to conduct the AA and determine **in view of best scientific knowledge**, and in the view of the Conservation Objectives of the site, whether the proposed project, either individually or in combination with other plans and projects is likely to have a significant effect on a Natura 2000 site and, where necessary, to ascertain whether any such effect would adversely affect the integrity of Natura 2000 sites." In addition, EC (2021). *Commission notice. Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC* advises that, "**The assessment must be based on the best available scientific knowledge in the field**. **This means that the information must be complete and up-to-date**." Furthermore, the European Union's Environmental Impact Assessment Directive aims to ensure that projects that are likely to have a significant impact on the environment are identified and assessed, within an appraisal process, before these projects proceed to development. Under Article 3 the 2011 Directive an EIA process must identify, describe and assess likely

effects (positive and negative) of a proposed development on among other elements, fauna and flora which includes wild salmonids. It is considered that the wholly inadequate assessment of the impact of sea lice from salmon farms on wild salmonids made in this NIS and EIA as outlined above fails to meet the stated objectives of the NIS (and indeed fulfil the official scope provided in standard guidance documents for the preparation of NISs) and the requirements of the EU Environmental Impact Assessment Directive.

**8. Deficiencies in assessment of the impact of the proposed farm on salmon, sea trout and pearl mussel stocks**

No explicit methodological consideration is presented in the NIS or EIA to the potential loss or detrimental population effects on individual wild salmon and sea trout stocks located in the wider vicinity of the proposed salmon farm associated with its operations (likely zone of influence), particularly in relation to the potential effects of increased sea lice loads. Therefore, in regard to the preparation of the Screening AA and NIS, due consideration was not given to EC (2021) Commission notice. Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. For the Screening AA, this includes the following:

- Description of likely effects on the Natura 2000 sites in view of the specific conservation objectives set out for the designating features, including:
    - disturbance to species, reduction in species populations and density;
    - changes in ecological functions and/or features that are essential for the ecological requirements of habitats and species;
    - interference with the key relationships that define the structure and function of the site.
- Criteria for assessing significance, indicators of significance, in view of the site-specific conservation objectives e.g.:
    - risk of species populations' displacement, level of disturbance, reduction of species home range, feeding area, refuge areas, alteration of favourable condition for breeding;
    - importance of the habitats and species affected, e.g. representativeness, local variety;
    - importance of the site (e.g. limit of distribution area for certain habitats and species, stepping stone, important for ecological connectivity);
    - disruption or alteration of ecological functions;

For the NIS this includes the following:

- conservation condition of the species in the site
- species vulnerability to potential impacts

It is particularly important to consider these in relation to vulnerable and potentially vulnerable stocks in Kenmare Bay and Ballinskelligs Bay including those salmon stocks marginally above or below their conservation limit (CL) or those stocks above CL showing declining trends in their attainment of CL (TEGOS annual reports). The CL is essentially the minimum number of adult salmon a river should have returning to ensure its stock is in a healthy state. In addition, some of the smaller rivers in the vicinity of the proposed operation, although not officially designated as salmon rivers are also known to record small stocks of salmon. In addition, sea trout stocks in Kenmare Bay and Ballinskelligs Bay may be particularly vulnerable to any additional pressures that may result from the proposed operation. Information on these are presented in the following sections but should have been considered in the consultation documents.

There are 14 designated salmon rivers in the Kenmare Bay and Ballinskelligs Bay area in the vicinity of the proposed operation namely: Emlaghmore, Inny, Currane / Waterville (all flow into Ballinskelligs Bay); Owenragh, Sneem, Blackwater Kerry, Finnihy, Roughty, Sheen, Cloonee, Owenshagh, Croanshagh, Lough Fada system, and Kealincha (flow into Kenmare Bay). In addition, these rivers along with the Tahilla and Coomnahorna have sea trout stocks. In the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC and River Blackwater (Kerry) SAC the conservation objectives for salmon are to maintain its

favourable status and restore its favourable status, respectively. There are also three catchments where pearl mussel is a qualifying interest, namely, the Currane, Kerry Blackwater, and Ownagappul (Lough Fada system) in the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC, Blackwater River (Kerry) SAC and Glanmore Bog SAC, respectively. Freshwater pearl mussel is an endangered species listed under Annex II and V of the EU Habitats Directive and protected under the Convention on the Conservation of European Wildlife and Natural Habitats. It is legally protected in Ireland under Schedule 1 of the Wildlife Act, 1976 (as amended) and the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477, 2011) (as amended). As such, any plans developments or activities that may cause undesirable impacts on populations must be fully evaluated. The location of the salmon farm with a maximum allowable biomass of 2,200 tonnes has the potential to affect wild salmon, an obligate host for pearl mussel larvae, and thereby indirectly effect freshwater pearl mussel. Given the nature of salmon farming there is potential that operations may directly impact wild salmon populations by increasing lice infection rates in wild salmon or through interbreeding which may result in indirect impacts to freshwater pearl mussel. Any increases in marine mortality of salmon and sea trout due to lice infestation from the proposed salmon farm could have significant effects on salmonid population status in these rivers and consequently to freshwater pearl mussel conservation objectives. The conservation objectives for the pearl mussel in the relevant SACs is restore the favourable conservation condition. In addition, under the attribute “host fish” the conservation target is to “maintain sufficient juvenile salmonids to host glochidial larvae” and states that, “No fish stocking should occur within the mussel habitat, nor any works that may change the salmonid balance or residency time.” IFI consider that all of these fish and mussel populations have the potential to be significant negatively impacted from the operations of the farm as a consequence of increased sea lice loads which may result in both lethal and sub-lethal effects on the salmonid stocks and ultimately result in reduced population sizes. This is not sufficiently considered in the NIS or EIA.

The *Screening for AA and NIS Volume 1 – main report* incorrectly states that the Blackwater (Kerry) has “approximately 1,500 salmon and grilse entering the river annually”. Since 2012 the annual run of adult salmon has been an average of 421 ranging from a low of 143 to a maximum of 675 in this time period. This data is published annually in the Appendices of the Standing Scientific Committee on Salmon and Technical Expert Group on Salmon reports. Indeed, the River Blackwater (Kerry), which also has a significant pearl mussel population reliant on salmonids to successfully reproduce, is now only marginally above its conservation limit and was below it in the period 2014 to 2023. The most vulnerable salmon stocks in the likely zone of influence are the Emlaghmore, Owenragh, Finnihy, Owenshagh, Lough Fada system and Kealincha, all of which have been closed to angling for many years as their stocks are considered to be in a precarious state based on juvenile electrofishing data and / or insufficient data to assess stock status. IFI are not aware of any contact from those responsible for preparing the Screening AA, NIS or EIA to solicit such information from us to better inform their assessments and resultant conclusions. Other rivers in the Kenmare Bay area, although above CL, notably the Roughty and Sheen have shown declining trends stocks in recent years (TEGOS annual reports). In addition, the Inney stock has fluctuated around its CL in recent years (TEGOS annual reports). Despite the well-documented declines in our national stock over the last few decades (ICES WGNAS 2023), any further such anthropogenic pressures that may be exerted on such stocks is very concerning and may further inhibit their potential rehabilitation, maintenance or improvement in stock status.

In addition to the above, in the *Screening for AA and NIS Volume 1 – main report Table 2.13: SACs designated for Annex II migratory fish species*, it should be noted that there are the following omissions as regards SACs where salmon is designated as a qualifying interest, namely:

- River Moy SAC
- The Twelve Bens/Garraun Complex SAC
- River Boyne and River Blackwater SAC
- West of Ardara/Maas Road SAC
- Unshin River SAC

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 salmon farm have impacted on out migrating 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 into 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 was intended to decrease the pressure on the sea trout stock. The bye-law was Introduced in 2018. In conjunction with is bye-law, IFI initiated a research programme for the Lough Currane/Waterville fishery to investigate the apparent decline in sea trout stocks. The study involves salmonid census data, fish monitoring in freshwater and salmonid monitoring in inshore marine waters. Each element aims to contribute to the determination of status of different life stages of sea trout and salmon to ascertain 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, a qualifying interest in the Killarney National Park, Macgillycuddy`s Reeks and Caragh River Catchment SAC.

In this context, it is also notable that specific conditions related to sea trout were contained in the original licence granted for the operation of the Deenish and neighbouring Inishfanard salmon farms, namely:

- “This licence will remain subject to ongoing review in light of continued monitoring of, and research into, the two marine sites and neighbouring sea trout fisheries which may be undertaken by the Salmon Research Agency and/or the Fisheries Research Centre.”
- “In the event of proven contra-indications for sea trout stocks causatively linked to the fish farming operations permitted under this licence, the Minister may exercise his discretion to take any necessary protective measures ranging from reduction in permitted production levels to revocation of the licence and harvesting of all stock”.

IFI are not aware of any such monitoring of, and research undertaken by these bodies or their successors to explore this.

In Section *6.5.1.2. Salmonids* of the EIA, in reference to the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC, it is stated that, “Drift net fishing for salmon was banned at the end of the 2006 season. Draft net fishing has not been licenced since 2014”. The latter is incorrect. The Castlemaine mixed-stock commercial draft-net fishery does exploit salmon stocks from the Caragh, Laune and Maine rivers, two of which are within the bounds of the SAC. Furthermore, in the same section, it is stated that, “These rivers and lakes fall under the Waterville rivers and lakes system which is managed by the Inland Fisheries Ireland. This system is utilised for salmon fishing each year with its open season being from 17th January to 30th .” This is incorrect. The system typically closes to salmon fishing on the 30th September and not 30th January.

In the consultation documentation, Amoebic Gill Disease (AGD) is noted as a parasite that may impact farmed salmon and associated pest control measures are outlined to address any outbreaks on the proposed farm.

Schall *et al*. (2022), note that this emerging disease could represent an additional threat to the long-term viability of wild salmon stocks. In their study, the impact of natural exposure to AGD on wild, hybrid and farmed post-smolt Atlantic salmon reared in a sea farm was assessed and it was found that wild fish showed substantially higher mortality levels (64%) than farmed fish (25%). However, no consideration is given to or assessment is made in the NIS or EIA for the potential of an AGD outbreak in the proposed farm operation to cross-infect wild salmon stocks the vicinity of the farm and the resulting consequences that may result for any impacted wild stocks. Further to this, it is unclear where the freshwater for any treatment of AGD would be sourced and this has raised environmental concerns of using lake abstraction in at least one other salmon farming operation in Ireland (IEHC 2021). If this is planned to be taken from a natural source it should be documented in the consultation documentation and any associated effects on the natural source evaluated in accordance with relevant directives and regulations and NIS/ EIA impact guidance.

Given some of the plausible limitations of the hydrodynamic and particle-tracking model used to predict lice dispersal listed under point 4 above, it is very likely that actual dispersal distance of sea lice from the farm could be greater than that shown in Figure 3-10 and 3-11 in Screening for Appropriate Assessment and Natura Impact Statement Volume 1 – Main Report. The actual potential dispersal distance of lice in km is not directly listed but numerous studies using hydrodynamic models coupled to particle tracking or statistical models based on observed lice densities at distance from farm sources or combinations of both have shown typical lice dispersal distances from salmon farms of tens of kilometres away (see Harrington *et al*. 2023 and references therein). Given that the majority of these studies are based in sheltered sea lochs, fjords and coastal inlets it is highly plausible that the higher energy coastal currents around Deenish may contribute to similar lice dispersal distances of up to and beyond 10 km, with the predominant surface dispersal direction being landward toward the aforementioned salmon and sea trout rivers owing to prevailing onshore wind conditions in this region.

**9. Deficiencies in assessment of the potential impact from the threat of fish escapes**

The *Screening for Appropriate Assessment and Natura Impact Statement Volume 1 – Main Report* states that, "large escape events have the potential to have a significant effect on wild salmon populations in the area especially considering the low returns within many salmon rivers" and that, "While escapees display considerable potential for long-distance dispersal/migration the incidence of farmed escaped salmon in rivers is correlated with the volume of farming within that region". The report concludes that, "the likelihood of an escape event occurring is remote and MOWI have adopted a range of measures to prevent such an occurrence; consequently, significant direct effects to the Qualifying Feature salmon and indirect effect to the Qualifying Feature freshwater pearl mussel can be excluded". The EIA notes that the selection of the Deenish site has considered fish escape risk, which increases, for example, in areas exposed to excessively heavy seas or heavy boat traffic and in its *Fish Escape Prevention Policy* (Appendix 4), MOWI identify the proposed operation at Deenish Island as a "high risk site" for fish escapes, further noting in the NIS that there is, "a High Risk for susceptibility to storm damaged based on the wave climate and hydrographic regime in the locality". In addition, the assessment of the screening AA (*Report supporting the Appropriate Assessment Screening of Intensive Aquaculture (T06/202) in Kenmare River SAC [Site Code: 002158] and Deenish Island and Scariff Island SPA [Site Code 004175*), notes that, "A literature review regarding escapees is provided and the potential for significant effect is recognised." Based on all these statements with regard to the potential for an escape event, a comprehensive assessment should have been made in the NIS and EIA of the potential impact of a large escape event from the up to 650,000 input farm stock on wild salmon stocks in the vicinity of the proposed operation. Indeed, an escape of *c*. 230,000 farmed salmon occurred from a site in Bantry Bay in 2014 due to storm damage, highlighting the potential for an escape event to occur regardless of the mitigation measures proposed.

There are numerous publications on the impacts of salmon farm escapes on wild salmon stocks (see supporting literature appended). The International Council for the Exploration of the Sea (ICES) workshop to

address the NASCO request for advice on possible effects of salmonid aquaculture on wild Atlantic salmon populations in the North Atlantic (ICES 2016) clearly summarises these in their conclusions as follows:

- The spawning success of escaped farmed salmon is much lower than wild salmon. Despite this, genetic studies have demonstrated that farmed salmon have displayed widespread introgression in a large number of Norwegian populations where this has been investigated.
- Farmed salmon are domesticated and display significant genetic differences to wild salmon in a wide range of fitness-related traits. Whole-river experimental studies have demonstrated that the offspring of farmed and cultured salmon in general, display lower fitness than their wild counter-parts in the wild.
- Juvenile escapees and the offspring of farmed salmon compete with wild salmon for territory and food. Therefore, their presence in the natural habitat will reduce the total production of wild fish. Studies have also shown this can result in a decreased overall productivity of the population.
- Where farmed salmon have successfully interbred with natural populations, it is likely that recipient populations will display changes in life-history traits. These changes are likely to be maladaptive for the wild population.
- Wild populations that are already under evolutionary strain from other challenges such as disease pressure, sea lice infection, over exploitation, habitat destruction and poor water quality are more likely to be sensitive to the potential negative effects of genetic introgression and loss of fitness.
- While recognising that there were still uncertainties, the Workshop considered that the evidence relating to the impacts of escapees / genetic introgression provided a clear indication of impacts on wild salmon populations. A substantial reduction of escaped farmed salmon in the wild, or sterilisation of farmed salmon, would be required in order to minimize effects on native populations.

The lack of any environmental impact assessment of the potential threat of an escape of up to 650,000 salmon to salmon stocks in the vicinity of the proposed operation is unacceptable and a major deficit in the consideration of potential impacts in the NIS and EIA documentation.

**10. Deficiencies in assessment of impacts to population and human health**

According to the EIA non-technical summary, "The renewal of the aquaculture licence will maintain employment and will therefore continue to play a beneficial role to the local communities in the area. The renewal of the licence and approval [sic] proposed licence amendments will have no negative effects on the local population." In addition, according to the EIA non-technical summary (Human Health section), "The receiving environment for human health in the context of the proposed development is considered with respect to those effects to human population…. and those potential effects to the following factors; … socio-economics and tourism (including recreation) as relevant to human health" and concludes that the proposed operations, "will not give rise to negative effects on human health". In the EIA section, 5.1 *Population & Socio-economics* and section *5.2 Human Health*, the assessment respectively concludes that there will be "positive effects on local employment" and "there will be no significant effects". Furthermore, according to the EIA non-technical summary (Biodiversity section - *Fisheries*), "Overall, given the measures, controls and monitoring that are [sic] will be in place at the fish farm, there will be no significant effects on fisheries." No such appraisals of the *potential effects on socio-economics and tourism (including recreation)* is presented in the EAIR or NIS in relation to the potential effects to wild salmonid fisheries which is set out extensively by us in the above sections. This is not only a particular concern to IFI but likely also to be a specific concern of other potentially impacted stakeholders. Indeed, the value of the salmon and sea trout tourist angling sector is estimated to have an expenditure in the region of €210 million to the All-Ireland economy and supports 3,235 jobs in this sector (ECSSTAI 2015). Indeed, angling is tourism is estimated to contribute up to 0.15% of mean household income in the remote rural economy of the Waterville area alone (Curtis *et al*. 2017).

There is no assessment made in the consultation documentation in relation to the potential negative socio-economic impacts to local and visiting participants involved in recreational salmonid fisheries and local

participants in commercial wild salmon fisheries in the area and zone of influence as a result of potential increased mortalities on individual wild salmonid river stocks from sea lice associated with the farm operations. Such a negative impact may have the potential to result in the closure of wild salmonid fisheries in the area and zone of influence, with those currently marginally above their conservation limit (CL) or the permitted threshold level for catch & release-only angling (i.e. 50% of CL) at particular risk in this regard even where such attributed mortality may be deemed relatively low. In addition, rivers in the locality currently under their CL for salmon or with impacted sea trout populations may be further curtailed in their ability to naturally recover to regain a healthy population status with this additional potential anthropogenic pressure exasperating existing such pressures on stocks. Indeed, Gargan *et al*. (2003) found a statistically significant relationship between lice infestation on sea trout and distance to the nearest salmon farm in Ireland over a 10 year period, with highest infestations and variation in infestation seen close to fish farms and showed that sea lice associated with salmon farming can affect sea trout stocks up to 30km from the farms. Gargan *et al*. (2003) demonstrated a significant negative relationship between sea trout survival and the level of lice infestation. The results indicated that sea lice from marine salmon farms were a major contributory factor in the sea trout stock collapse observed in aquaculture areas in the west of Ireland and this is particularly pertinent to the current degraded status of the Waterville / Currane sea trout population.

Further to the above, in the EIA section *11.4. Tourism and Recreation*, *11.4.2. Impact Assessment* it is stated that, "Recreational and tourism activities in the area currently take place in harmony with the existing aquaculture operation. The renewal application varies from the existing licence in that it requests a change to the boundaries of the existing site and to the operating conditions attached to the licence. If approved, the site boundaries will increase from 14.48ha to 33.48ha and operations will change from 10 pens to 15 pens. The increased site area will not prohibit or impact upon any existing recreational activity in the bay as only an additional 0.63ha of equipment will be visible at the surface". Considerations here are given solely in relation to the potential impacts as a result of the expansion of the site boundary without any consideration of the wider potential impacts to tourism and recreation as described above.

**11. Deficiencies in assessments and determinations based on "best scientific knowledge"**

The Screening for AA and NIS report states that its purpose is to provide the competent authority with the necessary information required to conduct the AA and make determinations in view **of best scientific knowledge**. The assessment of the screening AA (*Report supporting the Appropriate Assessment Screening of Intensive Aquaculture (T06/202) in Kenmare River SAC [Site Code: 002158] and Deenish Island and Scariff Island SPA [Site Code 004175*), states that, "**Assessments should be undertaken based on the best scientific evidence and methods**". The NIS notes that it has examined and analysed, **in light of the best scientific knowledge**, how the proposed operations could impact on the Qualifying Features of SACs and SPAs and whether the predicted impacts would adversely affect the integrity of protected sites and states that, "**there is no reasonable scientific doubt**" in relation to its overall conclusion that there is likely to be no significant direct or indirect effects. The EIA concluded that the proposed operations together with the mitigation measures proposed, will not significantly affect the environment.

National and EU guidance documentation on the preparation of Screening AAs, NIS and EIAs highlight the importance of making assessments and determinations based on the best scientific knowledge, evidence and methods. However, this has clearly not been achieved in the preparation of the consultation documentation to support the conclusions made as set out in the above sections. This is particularly notable in relation to assessing the potential impacts of increased sea lice loads associated with the proposed operations and potential farm escapes and their consequent potential effects to proximal salmon, sea trout and pearl mussel populations as well as the potential socio-economic effects that may arise.

Indeed, the EPA *Guidelines on the information to be contained in environmental impact assessment reports* (EIAR) are intended to inform the obligations on those who are preparing EIAs. The *Guidelines* are also

intended to provide all parties in the EIA process with a standard to measure whether EIARs are fit for purpose. Moreover, the *Guidelines* highlight the importance of the methods used in the preparation of an EIAR to ensure that the information presented is adequate and relevant. They specifically note the following:

- The EIAR should consist of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment and the information presented should be relevant and complete and systematically presented and assessed.
- The assessment should be conducted with objectivity, and based on high quality scientific information using recognised methods that are presented in a fully transparent manner with clarity.
- Baseline information should be sourced from published references to ensure reliability and objectivity and should be sufficient to inform a reliable assessment of the implications for the environment.

Such guidance further highlights the inadequacies of the EIA and NIS, specifically concerning the omission of reference and consideration to a large body of more up to date published peer-reviewed literature from Ireland and internationally demonstrating the impacts of sea lice and escaped farmed salmon on wild salmonids. In IFI's consideration, an objective assessment of this literature is likely to conclude that there is significant reasonable doubt evident in relation to the conclusions made in the application that no significant direct or indirect effects are likely.

**12. Deficiencies in assessments of long-term sustainability of Atlantic salmon aquaculture in the context of ongoing climatic and oceanographic change**

There is no consideration of the potential impacts that climate change and oceanographic change in the North Atlantic could pose to the long-term sustainability of Atlantic salmon aquaculture in the proposed fish farm site. Chapter three of the Irish Farmed Salmonid Health Handbook (2011) states that "Ongrowing salmon tolerate temperatures between 1-18 °C, and, in Ireland, seem to display a preference for 12-14 °C". These figures are generally in accordance with FAO advice regarding Atlantic salmon aquaculture at sea sites, which states that "Atlantic salmon grow best in sites where water temperature extremes are in the range 6-16 °C" (FAO, 2009). However, long-term (2002-present) high-resolution (sub-daily) sea surface temperature records are available from the M3 data buoy, part of the Irish Marine Data Buoy Observation Network , which lies approximately 60 km from the Deenish site. These observed data show that sea surface temperature maxima often exceeds 18 °C during summer months, and this is becoming increasingly apparent in recent years, with each of the 8 most recent summers (2016-2023) consistently experiencing sea surface temperatures in excess of 18 °C. Furthermore, overall average background August sea surface temperatures for the period 2002-2023 were 16.33 °C, above the stated preference for ongrowing farmed salmon, and in the most recent five-year period this has risen by 0.5 °C, to a mean August sea temperature of 16.83 °C. Given that contemporary summertime maximum sea surface water temperatures are already exceeding stated industry tolerances for ongrowing farmed salmon, and that background mean temperatures during the warmest part of the year are already in excess of optimal feeding and growth temperatures, the question over the future long-term sustainability of sea cage salmon aquaculture at this site must be critically evaluated – this was not considered in the consultation documentation. This is especially pertinent in the context of future climate projections that sea surface temperatures around Ireland will continue to rise unabated. Indeed a recent report by the Marine Institute (Nolan *et al*. 2023) specifically indicates the magnitude of near-term projected warming in sea surface and bottom temperatures in the southwest of Ireland by 2035 (within the coming decade). Given this very high uncertainty surrounding the long-term viability of salmon aquaculture at the proposed site and the high potential for ecological damage to be incurred by regional biodiversity in the short-term, it is prudent to weigh any proposed short-term socio-economic gain associated with salmon aquaculture at this site against compromising the long-term ecological integrity of wild Atlantic salmon and sea trout populations and the immense ecological and cultural services that these species could continue provide across freshwater and marine environments in the long-term.

## 13. Deficiencies in assessments in the context of Ireland's biodiversity commitments and other plans and projects

There is no appraisal given in the consultation documentation to the potential effects of the proposed operations and their alignment with the 3rd National Biodiversity Action Plan 2017-2021 and actions contained therein including those relating to the implementation of OSPAR recommendations on Habitats and Species (OSPAR 2016). In addition, the draft 4th National Biodiversity Action Plan 2023-2030 covering the likely proposed period of the operation of the farm should also be considered in this regard. Furthermore, there is no evaluation of the proposed operations on how they are in compliance with the NASCO guidance on best management practices to address impacts of sea lice on wild salmon stocks, the stated international goal of which is that 100% of farms are to have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farms. (NASCO 2009).

## 14. Conclusion

In conclusion, IFI considers that the proposed operation has the potential to result in negative consequences for qualifying interests (wild salmon and pearl mussel) and sea trout as well as having potential associated socio-economic impacts, all of which are not adequately assessed in the NIS and EIA. As such, the overall determination that no significant effects are likely is flawed. Therefore, we recommend that the aquaculture licence for the renewal of salmon farming at the Deenish Island site should not be granted.

Yours sincerely,



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Chief Executive
Inland Fisheries Ireland

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## 16. Compilation of supporting literature

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**From:** [redacted]
**Sent:** Friday 9 February 2024 15:10
**To:** FinfishPC
**Subject:** Renewal of MOWI (Silver King Seafoods) licence for salmon farming at Deenish Island

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**Renewal of MOWI (Silver King Seafoods Ltd) licence for salmon farming at Deenish Island**

Dear Sir / Madam – I am writing in relation to the above matter. I, together with, I am sure all conscientious anglers of Ireland and indeed anyone who values our natural environment, wish to object in the strongest possible terms to this development.

The potential consequences of this activity on our native salmon and sea trout population would be extremely serious. The evidence of the damage that such intensive farming causes is overwhelming and should by now be clear to see by all Government officials, in terms of the devastation of marine ecosystems caused by pollution, parasites and high fish mortality rates . It is furthermore difficult to countenance how such an operation could be licenced, particularly given MOWI's behaviour leading up to the company's licence being revoked in 2019.

I would strongly urge you to take the correct course of action and to deny the renewal of this licence for Deenish Island – this is an extremely serious matter, with potentially disastrous environmental consequences.

Thank you for taking my viewpoint into consideration.

Yours Sincerely

[redacted]

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Friday 9 February 2024 16:01
**To:** FinfishPC
**Subject:** Renewal Application for Licence Ref T06/202 Mowi Fish Farm Denish Island Co Kerry
**Attachments:** Fish Farming Objection.docx

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Dear Sir or Madam
Attached please find objection to the above proposal.
Yours Sincerely
[redacted]

[redacted]

9th Feb 2024-02-09

Minister for Agriculture Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Cloghean
Clonakilty
Co Cork
P85 TX47

Re; T06/202 Renewal Application for Licence to operate a fish farm at Deanish Island Co Kerry.

Dear Sir or Madam
I wish to object to the renewal of Marine Fish Farm Aquiculture Licence at, Deanish Island, County Kerry, (Licence Site T6/202) for the reasons stated below and for the reasons stated in Salmon Watch Ireland's submission dated the 6th of February 2024.

1, The obvious and proven links between the decline of wild Salmon and sea Trout numbers in specific areas around our coast where fish farming at sea enterprise is practiced.

2, The applicant company's, (Mowi Ireland), past history of ignoring the operating conditions of their expired licence.

3, The fact that the fish farm is located within an SAC (002158) and is adjacent to an SPA ( 004175) when there is empirical evidence to show that open cage fish farming cad adversely impact the qualifying interests of both protected sites.

4. It has been proven that fish farming enterprises have directly contributed to the collapse in sea trout populations in the Lough Currane catchment and in other sea trout catchment rivers and lakes in the Northern hemisphere.

5. There is serious animal welfare issues associated with open cage fish farming. Mowi's own recorded losses show a 48.8% mortality rate for fish farmed at this location, (See page 13 Salmon Watch Ireland's) submission.
I would be obliged if you would take the following points into consideration when considering the application for renewal of the licence application.

Yours Sincerely

[redacted]

0190
(Duplicate of 0189)

**From:** [redacted]
**Sent:** Friday 9 February 2024 16:22
**To:** FinfishPC
**Subject:** Application T06/202 Mowi licence renewal
**Attachments:** Fish Farming Objection.docx

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Attached please find objection to the above.
Regards
[redacted]

0190
(Duplicate of 0189)

[redacted]

9th Feb 2024-02-09

Minister for Agriculture Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Cloghean
Clonakilty
Co Cork
P85 TX47

Re; T06/202 Renewal Application for Licence to operate a fish farm at Deenish Island Co Kerry.

Dear Sir or Madam
I wish to object to the renewal of Marine Fish Farm Aquiculture Licence at, Deenish Island, County Kerry, (Licence Site T6/202) for the reasons stated below and for the reasons stated in Salmon Watch Ireland's submission dated the 6th of February 2024.

1, The obvious and proven links between the decline of wild salmon and sea trout numbers in specific areas around our coast where fish farming at sea enterprise is practiced.

2, The applicant company's, (Mowi Ireland), past history of ignoring the operating conditions of their expired licence.

3, The fact that the fish farm is located within an SAC (002158) and is adjacent to an SPA ( 004175) when there is empirical evidence to show that open cage fish farming can adversely impact the qualifying interests of both protected sites.

4. It has been proven that fish farming enterprises have directly contributed to the collapse in sea trout populations in the Lough Currane catchment and in other sea trout catchment rivers and lakes in the Northern hemisphere.

5. There is serious animal welfare issues associated with open cage fish farming. Mowi's own recorded losses show a 48.8% mortality rate for fish farmed at this location, (See page 13 Salmon Watch Ireland's) submission.

I would be obliged if you would take the following points into consideration when considering the application for renewal of the licence application.

Yours Sincerely

[redacted]

**From:** [redacted]
**Sent:** Friday 9 February 2024 18:49
**To:** FinfishPC
**Cc:** charlie.mcconalogue@oireachtas.ie
**Subject:** FW: T06/202 Public Consultation on an Aquaculture Licence and Foreshore Licence Application and Invitation for Public Submissions or Observations on Appropriate Assessment

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Dear Sirs,

I am writing to you in relation to the above application for renewal of a Finfish Aquaculture licence to operate an open-net salmon farm at Deenish Island (site ref:T06/202) currently with your department.

[redacted] I commenced fishing for salmon and seatrout in Lough Currane, a lake once famous around the world for stocks of large salmon and for producing the majority of the specimen seatrout caught in Ireland and indeed in the UK, historically, which resulted in large numbers of fishing visitors to Waterville. The arrival of a salmon fish farm off Deenish Island however brought this and the associated tourist benefits for the local economy, to an end.

Due to the presence of open-net fish farms at sea, borne out by scientific evidence, the populations of salmon and seatrout have been decimated over most of the last 30 years. Records show that when the Deenish Island salmon farm was not operational during periods over the last three decades, the local wild salmon and sea-trout populations recovered significantly, only to suffer repeat crashes, once the operation of the farm at Deenish Island resumed.

Irrefutable evidence has been established to show open-net salmon farming at sea is responsible for the ongoing deterioration in wild salmon numbers due to disease and sea lice and virtually, total, destruction of the seatrout populations around our coasts from the same causes. Because seatrout spend most of their time at sea, in “shallow” coastal waters (as opposed to deep sea, Atlantic waters), they are particularly exposed to the dangers caused by salmon farms at sea. Open-net salmon farms at sea have also been shown to cause serious environmental pollution. These findings have been peer reviewed and accepted as accurate by the Department of The Environment, Climate and Communications.

Most maritime nations hosting fish farming enterprises have reached the same conclusion that open-net farming activities are harmful to the environment and, inter alia, natural populations of wild salmon and seatrout.

Currently, seatrout and wild salmon populations around our entire coastline, especially in areas where salmon farms operate, are at critically low levels and are in danger of disappearing for ever, which does not need to happen if one of the alternative established safe, closed containment production methods,

were adopted by MOWI Ireland. In relation to seatrout originating from Lough Currane and the Waterville Fishery generally, it should be noted that these fish are different genetically to seatrout from other Irish regions having a unique gene in their make-up, which is not found in seatrout from elsewhere. This gene is believed to be the reason for the specimen size often found in the past in seatrout from the Waterville Fishery. There is therefore the prospect of the loss of this uniquely Irish genetic attribute forever, if that gene pool becomes extinct.

Current research has, in addition, raised concerns regarding the dangers to human health from exposure to the large volumes of chemicals used by open-net farms in their efforts to control sea lice numbers and disease, and from the consumption of potentially contaminated farmed salmon produced under the present open-net system. It has been suggested that the chemicals used for lice and disease control in salmon, whilst in the nets, do not affect the fish. However evidence shows that a large proportion of harvested fish have suffered injury whilst in the nets, creating pathways for chemical compounds to ingress the bodies of the fish. Evidence also indicates the mortality rate amongst the caged salmon at Deenish Island is as high as 48%, which raises additional concerns in relation to the welfare of the fish whilst in the nets.

MOWI try to argue that the levels of dangerous compounds in farmed salmon are below permitted levels and therefore do not represent a threat to human health. As an individual product, that might be the case, but to what extent do the levels in farmed salmon contribute to the overall levels of contaminants in our food, which in the aggregate, make our food dangerous? For the authorities not to require safer methods of production, is bordering on criminal, particularly when proven-to-be-safer methods of production are readily available. Why even take the risk? Why does the Department of the Marine not adopt the EU required precautionary rule, as the only acceptable standard practice, in this instance.

Again it should be noted that MOWI in their native country Norway, would not be allowed produce farmed salmon for human consumption, in the way they do in Ireland. The Norwegian health authorities have established and enforce, extremely rigorous controls to ensure maximum fish welfare, minimum use of chemicals, and maximum food safety and fish quality standards. Regular sea-floor inspections are carried out to also ensure minimum disturbance of the sub-surface environment.

MOWI Ireland, as part of their recent renewal application, have also applied for an increase of nearly 100%, in their permitted production. With twice as many fish, there could be twice as many, if not more, sea-lice and twice the concentration levels of disease **and** twice the current extent of environmental pollution (which already is significant) from the farm.

In 2019, the Minister for Agriculture rescinded the permission then in force for MOWI at Deenish Island, due to a number of breaches by MOWI Ireland, of the terms of the permission granted to MOWI Ireland. MOWI Ireland appealed the rescinding of permission, and the associated appeals are ongoing, with a parallel European Complaint instigated by Salmon Watch Ireland also questioning the legality of the current legislation concerning salmon farms in Ireland. To resurrect and grant renewal, of what was a previously discontinued aquaculture licence to operate an open-net salmon fish farm at Deenish Island, could allow the outcome of the current legal actions to be ignored, thereby necessitating further new appeals to the courts, bringing the reputation of the Department of the Marine into international disrepute by leaving it open to allegations of being complicit in an attempt to circumvent the role of the courts in Ireland.

I believe wild salmon and seatrout are part of Ireland's heritage. Furthermore, I believe the ongoing failure of the Irish Government to require that all salmon fish farming operations be carried out using safe closed containment production methods, thereby continuing a discredited, environmentally damaging and potentially harmful to human health (farm employees and the greater public) method of production represents theft, by negligence or inaction, of what in reality is part of the nation's rightful inheritance, particularly when modern science has devised better, safer, less costly and less environmentally damaging methods of production.

I demand therefore for the sake of both the already seriously threatened environment and current and future generations in Ireland, that the application for renewal of the Finfish Aqualculture and Foreshore Licences to operate an Open-Net salmon farm at Deenish Island (site ref: T06/202) be declined.

Yours faithfully

[redacted]

**From:** [redacted]
**Sent:** Friday 9 February 2024 19:17
**To:** FinfishPC
**Cc:** EFI
**Subject:** T06/202 xxxxxxxxxxxxxxx
**Attachments:** Deenish Island licence objection.pdf

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To Minister for Agriculture, Food and the Marine

Aquaculture and Foreshore Management Division

National Seafood Centre

Clogheen

Clonakilty

Co. Cork

P85 TX47

Please see attached.
Kind regards
Ethical Farming Ireland and others listed in the attachment

Minister for Agriculture, Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty
Co Cork
Ireland

**Please reply to:**
info@ethicalfarmingireland.com

9th February 2024

**T06/202 Public Consultation on an Aquaculture Licence and Foreshore Licence Application and Invitation for Public Submissions or Observations on Appropriate Assessment**

Dear Minister McConalogue

We wish to object to the purported 'renewal' of the licence referred to above on the grounds that this licence was actually revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed, in 2019 for overstocking by 121%[1]. Accordingly, the licence cannot be renewed as it is not valid.

Minister, if you approve the renewal of this licence you will be rewarding MOWI for breaking the conditions of their previous licence and set a dangerous precedent for future licence infringement cases. It would also imply that the former Minister acted erroneously.

Without prejudice to the foregoing, we also object to the licence being granted for the reasons outlined below.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. It has a history of problems with Amoebic Gill Disease which can be passed on to wild salmonids.

The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

During the years 2004 to 2009, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production in 2010.

[1] https://alab.ie/activeappeals/appealsyearsreceived/appealsreceivedin2019/ap12019/#d.en.189147

In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

As Deenish salmon farm is operating in a Natura 2000 site, it is imperative that the use of antibiotics, toxic pesticides to treat sea lice infestations, antifouling agents and other toxic chemicals are taken into account when determining whether to grant the renewal application or not.

The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al[2].

There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to them, causing up to 39% mortalities in migrating salmon smolts. The Norwegian Scientific Advisory Committee for Atlantic Salmon conducted a recent study, showing that salmon lice from aquaculture farms are the single largest threat to the future development of sea trout.[3]

Our seas are warming as a result of climate change and mortalities in salmon farms are increasing. Mortalities at the Deenish Island farm, ranging from 25% to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

Furthermore, fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

Wild Atlantic salmon has recently been placed on the Red List of endangered species by the International Union for Conservation of Nature[4]. Although sea trout is not considered endangered, stocks have collapsed in recent years and there are concerns about the impacts of lice infestations.[5] It is your duty to protect the last remaining wild Atlantic salmon and sea trout in Irish waters by refusing the MOWI Deenish licence T06/202 grant/renewal.

Yours sincerely

[redacted]; Asamblea de Mujeres Insulares por las Aguas - Chiloé
[redacted]; Ethical Farming Ireland
[redacted]; Feedback
[redacted]; Galway Bay Against Salmon Cages
[redacted]; GSFR
[redacted]; Healthy Bays Network
[redacted]; Ingen Burfisk i Havet
[redacted]; Living Oceans Society
[redacted]; LOWCOau:Leave our Waters Collective Australia
[redacted]; Patagonia
[redacted]; Planet Oceans
[redacted]; Rauch Foundation
[redacted]; Slow Food Chile AG
[redacted]; VÁ! In East Iceland
[redacted]; WildFish
[redacted]; Wild Fish Conservancy

[2] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3675643/
[3] https://www.vitenskapsradet.no/Nyheter/threats-to-sea-trout-in-norway
[4] https://www.iucn.org/press-release/202312/freshwater-fish-highlight-escalating-climate-impacts-species-iucn-red-list
[5] https://www.fisheriesireland.ie/species/sea-trout-salmo-trutta-trutta

**From:** [redacted]
**Sent:** Friday 9 February 2024 21:01
**To:** FinfishPC
**Subject:** Reference T06/202
**Attachments:** Salmon Farm Objection.docx

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Re: Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

Dear Minister,

Please see attached letter.

Thank you for your consideration of same.

Sincerely

[redacted]

From: [redacted]

Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division,

National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47

Letter emailed to: FinfishPC@agriculture.gov.ie

Reference T06/202

Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

Dear Minister,

I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17 th January to 12 th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We

need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of tourist angling business at Waterville.

Minister, please decline this licence application – remove the farm and you remove the problems.

Thank you for your consideration of same.

Sincerely

[redacted]

**From:** [redacted]
**Sent:** Friday 9 February 2024 23:44
**To:** FinfishPC; Minister
**Subject:** Application for aquaculture licence ref T06/202

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I wish to record an objection to the granting of renewal of the marine aquaculture licence at Deenish Island the subject of application Ref. T06/202 or a review of the existing licence thereof.
It is noted that the application for renewal (which also includes a review of existing licence) relates to a licence that was revoked by the Minister for Agriculture, Food and the Marine, which decision is currently, and for a considerable period of time, the subject of appeal to ALAB.
It is expected that the decision by the Department of Agriculture, Food and the Marine to process this renewal application and also a review of the existing licence in respect of a licence that has already been revoked by the Minister is not considered prejudicial to the decision making process of the appeals body ALAB. It seems highly improbable that such is the case but there is an expectation that the Department has considered the matter fully and has decided to proceed with consideration is a renewal and review, however bizarre this may seem.
I have copied this input to the Minister's Office in anticipation of confirmation that due process is fully addressed in this regard.

My principal reason for objecting to the granting of a renewal or review of the licence is based on what is considered the proven detrimental effect that sea based salmon farms have on the stocks of sea trout and to a lesser extent salmon on Lough Currane. I have fished for sea trout in Currane for over 40 years and I have seen at first hand the decline in sea trout numbers in this lake, particularly in the last few years.
Repeated studies have clearly shown that the proliferation of sea lice associated with these farms has caused significant negative impact on stocks of sea trout in particular.
In addition to the overwhelming formal scientific evidence there is substantial evidence sources from what is now popularly known as "citizen science ". From my own observations and from talking to other anglers and, in particular the ghillies in Currane, it is clear that the fluctuation in sea trout stocks is directly affected by the activities at Deenish Island. Fallow periods have allowed for intermittent recovery but the substantial collapse in stocks over the past few years must now be close to eradicating the sea trout species in Currane. Anglers have played their part in observing a catch and release policy over the past few years but, frankly, stocks are currently at such a diminished level that there is no longer an incentive for sea trout anglers to visit Currane.
Aside from the environmental effect, there is a significant economic negative impact with the reduced days that ghillies are employed by domestic and, traditionally, a significant number of European and international anglers and the associated reduction consequential trade in hotels,bed and breakfasts, pubs and restaurants.

[redacted]

From: [redacted]
Sent: Saturday, February 10, 2024 1:04 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection

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To who it may concern, I object to the MOWI in salmon farming at Dennish Island. I have been coming to Kerry salmon and seatrout fishing for the last 30 years. In the last number of years I have noticed that sea trout and salmon are nearly becoming extinct in Kerry due to the harm salmon farming is causing. What a shame for tourism and nature. Meanwhile we have been working hard to protect biodiversity in our rivers, streams and lakes, working with inland fisheries Ireland and abiding by their rules and regulations. By providing a licence to fish farms, we are taking a step back and hindering the work being done to protect biodiversity and wildlife in Ireland. Yours sincerely, [redacted]

Sent from my iPhone

**From:** [redacted]
**Sent:** Saturday 10 February 2024 13:18
**To:** FinfishPC
**Subject:** Objection to application T06/202

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Reference T06/202

I would like to object to the salmon farm application no T06/202. I reiterate the points made by Salmon Watch Ireland in their detailed submission. In particular, I believe it is of paramount importance the precautionary principal is be followed under EU Habitats Directive.

I can attest from personal experience as a spouse of a keen sea trout & salmon angler that the fishing on Lough Currane has deteriorated considerably since the 1980's. That the bed and breakfast my husband stayed in and hired their boats and gillying services is no longer viable. My husband and his friends rarely bother to travel to Waterville to fish now affecting restaurants and shops in the town. When he has tried fishing on Currane in recent years he has observed a much reduced number of angling boats on the lake with all the knock on effects to the area as above.

Yours
[redacted]

Virus-free.www.avg.com

**From:** [redacted]
**Sent:** Saturday 10 February 2024 16:22
**To:** FinfishPC
**Subject:** Objection to T06 / 202 Proposal
**Attachments:** [redacted] 08 Feb 2024 Objection to Proposal T06 202 Deenish.pdf

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Please find attached signed copy of objection to Proposal T06/202 at Deenish Island, hard copy to follow in the post. Please acknowledge receipt of this email.

Yours sincerely

[redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85TX47.

07 February 2024

**Objection to the Proposal T06/202, by Silver King Seafood, Mowi Ireland, Kindrum, Fanad, Letterkenny. Co Donegal for a Salmon Farm at Deenish Island, between Ballinskelligs Bay and Kenmare, Co. Kerry. (Called Deenish Island here for brevity)**

**Introduction;**

A proposal for a salmon farm at **Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry,** is currently under consideration.
The Irish government and statuary bodies have a history of not safeguarding our environment. This has been highlighted by the numerous times that environmental protective action has been taken by the Irish Government, only under the threat of fines and possible court action by the EU.
We are now at risk of this happening again.
I object to this application, and request that a salmon farm T06/202 at Deenish Island is not allowed for the following reasons:

- **Wild salmon at risk**
- **River Angling at risk**
- **Water quality at risk**
- **Wildlife at risk**
- **Shellfisheries at risk**
- **Biodiversity Risk**
- **Tourism at risk**

Only in this way can the marine environment, protected species, local fishing and tourism jobs, be safeguarded.
Further concerns arise regarding the legislative framework for salmon farming licences in Ireland. A direct conflict of interest arises, as the same Minister that has set the salmon farming policy agenda has almost total control over all stages of aquaculture licence procedure, from approval to monitoring and policing.

**Wild salmon at risk**

The International Union for Conservation of Natures Red List of Threatened Species (IUCN) has moved The **Atlantic salmon** (*Salmo salar*) from Least Concern **to Near Threatened**, with new evidence showing the global population decreased by 23% between 2006 and 2020[1].Atlantic salmon are now restricted to a small portion of the rivers they inhabited a century ago across northern Europe and North America, due to multiple threats over the course of their long-distance migrations between freshwater and marine habitats.

[1] https://www.iucn.org/press-release/202312/freshwater-fish-highlight-escalating-climate-impacts-species-iucn-red-

***Threat from sea lice***

In the wild, salmon are perfectly adapted to cope with sea lice concentrations found in natural open ocean environments. However, in salmon farms sea lice build up to such an extent that the fish have to be treated with pesticides to stop them suffering such severe damage that they develop infections and die. In the west of Ireland, where salmon farms are near ubiquitous, young wild salmon (smolts) must migrate unprotected through dense clouds of sea lice and sea lice larvae. It is universally accepted that these lice are having a negative impact on wild salmon and sea trout populations.

Various scientific studies have examined the scale of this impact. What is clear is the sea lice emanating from salmon farms are significantly increasing mortality rates in juvenile salmon migrating out to sea. The young salmon, called smolts, are most vulnerable because of their size. Indeed, it only takes a couple of sea lice significantly impacting their potential survival. In turn, the numbers of adult salmon returning to spawn has dropped so drastically they're increasingly limited in their ability to sustain future generations.

This research highlights the need to separate salmon farms from wild salmon rivers to ensure wild salmon populations are not at risk of collapsing. It is for these reasons, that in 1994 a Report commissioned by the Minister of the Marine from the Sea Trout Working Group stated that until the precise nature of the relationship between sea lice and sea trout is understood '*a precautionary approach dictates that it would be prudent to avoid siting new fish farms or increased salmon farm production...within 20km of a sea trout river mouth*'.

Today, the situation is far from resolved. Salmon farms continue to be located much too close to wild salmon rivers with the result that local salmon and sea trout populations have been devastated.

While some progress has been made in the control of sea lice on some farms, these are often thwarted. Increasing disease incidence has affected fish appetite resulting in decreased ingestion of in-feed medication to control sea lice. Furthermore, increased resistance to treatment and warming seas are also favouring lice breeding.

***Threat from escapes***

A further threat to wild salmon comes from escaped farmed salmon. For a long time, it has been known '*escapees can have detrimental genetic and ecological effects on*

*populations of wild salmon. The present level of escapees is regarded as a problem for the future sustainability of sea-cage aquaculture'.*[2]

They spread disease and parasites, compete for food, and over-run redds.[3]

A further problem lies with inbreeding and genetic dilution. In the wild, salmon are loyal to a particular river, returning each year to spawn. Each river's salmon population has adapted over thousands of years to be perfectly in tune with that very environment. If escaped farmed salmon cross breed with wild populations they pose a significant threat to their gene pool. Farmed fish are designed to be aggressive feeders that grow fast. But, they're not used to dealing with predators, and don't have carefully attuned strategies for growth, maturity, timing of migration and resisting disease that relate to their local river.

Research shows escaped farmed salmon are just as fertile as their wild cousins, and identifies *'a clear threat of farm salmon reproduction with wild fish'.*[4]

The result of such inbreeding is reduced homing precision, survival, life span, and productivity of wild salmon populations.[5]

A further, and ironic impact of salmon farm escapes is they may inflate catch based spawning stock estimates to such an extent, that the stock appears either to be healthy or recovering, the consequences of which are that conservation measures are either relaxed or not strengthened, or new measures not being introduced.[6]

Such a situation has already been seen in Ireland with the collapse of sea trout in Connemara during the 1980s when salmon farming was introduced. [7]

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[2] Letter from Mark Costello to Minister Coveney, 10 May 2013 http://bantryblog.wordpress.com/2013/05/13/fie-press-release-13-may-2013-world-expert-warns-minster-on-sea-lice-cites-recent-incorrect-information-in-the-media/.

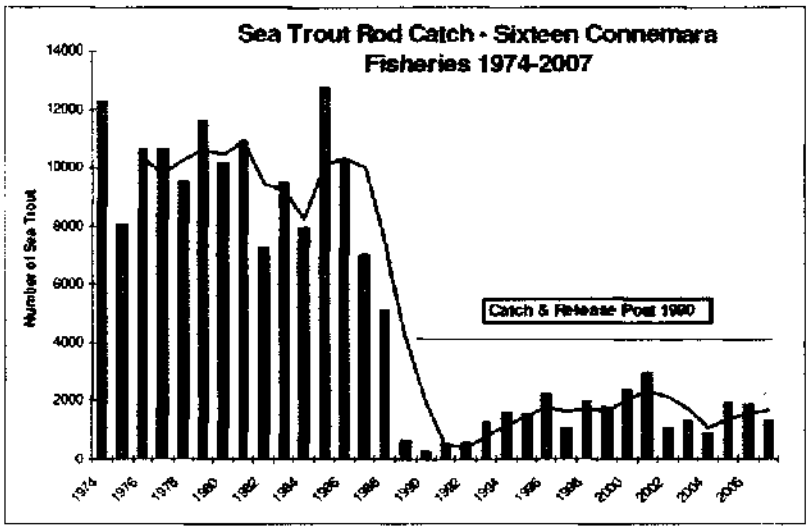
[3] Letter from Mark Costello to Minister Coveney, 10 May 2013 http://bantryblog.wordpress.com/2013/05/13/fie-press-release-13-may-2013-world-expert-warns-minster-on-sea-lice-cites-recent-incorrect-information-in-the-media/.

[4] Association of Salmon Fishery Boards, Statement on Sea Lice, 3 Feb 2013, http://www.asfb.org.uk/asfb-statement-on-sea-lice/

[5] M Krkosek, C W Revie, B Finstad and CD Todd; (2013) Comment on Jackson *et al.* 'Impact of *Lepeophtheirus salmonis* infestations on migrating Atlantic salmon, *Salmo salar* L., at eight locations in Ireland with an analysis of lice-induced marine mortality', Published in Journal of Fish Disease, doi: 10.1111/jfd.12157.

[6] Jensen, Ø., et al. "Escapes of fishes from Norwegian sea-cage aquaculture: causes, consequences and prevention." Aquaculture Environment Interactions 1.1 (2010): 71-83.

[7] Krkosek. M et al. Impact of parasites on salmon recruitment in the Northeast Atlantic Ocean, Proc R Soc B Journal, 2012, http://rspb.royalsocietypublishing.org/content/early/2012/11/01/rspb.2012.2359




Open pen salmon farms are simply not environmentally or economically compatible with the thriving leisure river fishing industry, as highlighted by the 1994 Sea Trout Working Groups Report's recommendation of a 20 km distance between a salmon river and a salmon farm.

**Water quality at risk**

Salmon farms are known as a major source of biological and chemical pollution. A salmon farm at Deenish Island will discharge biological pollution in form of nutrients nitrogen and phosphorus.

Such is their devastating impact; the law requires all towns and cities to treat sewage, to remove these nutrients prior to discharge[8]. All other forms of industrial farming must also treat their waste, again to ensure water quality is maintained. It is known that nutrients phosphorus and nitrogen in fish farm waste can contribute to harmful algal blooms.

Chemical discharges also arise from the treatments used to control parasites and disease in salmon farms in Ireland.

**Biodiversity Risk**

This proposed salmon farm would pose a risk to a variety of animal, plants, fungi, and even micro-organisms like bacteria that make up our natural world.

[8] Fleming IA, Hindar K, Mjølnerød IB, Jonsson B, Balstad T, Lamberg A (2000) Lifetime success and interactions of farm salmon invading a native population. Proc Biol Sci 267:1517–1523

**Tourism at risk**

The Kerry and Cork coastlines are becoming more and more popular for tourists looking for a peaceful and unspoilt refuge. The locating of toxic salmon farms are certainly not welcome in such scenic and naturally pristine areas.

Yours sincerely

[redacted]

**From:** [redacted]
**Sent:** Saturday 10 February 2024 17:34
**To:** FinfishPC
**Cc:** charlie.mcconalogue@oireachtas.ie
**Subject:** FW: T06/202 Public Consultation on an Aquaculture Licence and Foreshore Licence Application and Invitation for Public Submissions or Observations on Appropriate Assessment

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Dear Sir/Madam

**T06/202 RENEWAL APPLICATION FOR LICENCE TO OPERATE A FISH FARM AT DEANISH ISLAND, CO KERRY**

I have been visiting Derrynane, Co Kerry [redacted]

**Loughs of Ireland – A Flyfisher's Guide by Peter O'Reilly**

I quote from Peter O'Reilly's excellent book: -

**"Mention Lough Currane, Waterville, Co Kerry and images of spring salmon and huge seatrout, together with shining grilse and brown trout flash across the imagination.**
**For this must surely be one of Irelands greatest game fishing loughs – one that draws anglers from all over Europe and further afield too,**
**where, with the help of an experienced and competent local boatman, many a novice landed his or her first salmon.**

**The hardworking Waterville Fisheries Development Group aims to maintain the fishery as one of the country's premier game fisheries".**

Unfortunately, this is no longer the case.

It's a fact that open cage fish farming has directly collapsed the wild salmon and seatrout populations, with serious consequential loss of tourism to this small rural area. An area that relies heavily on tourism to provide a living.

Therefore, please register my objection to the renewal of Marine Fish Farm Aquaculture Licence at Deanish Island, Co Kerry.

I don't need to quote a long list of reasons, as more scholarly members of the public will set out the proven science to support the objections to this application.

Surely, sense will prevail, or will big wheels of industry dictate the fate of this beautiful corner of Ireland.

Who will turn out the lights, when pollution is beyond control and the tourists have all left because it is no longer safe to even swim the sea.

Yours faithfully

_____

[redacted]

**From:** [redacted]
**Sent:** Saturday 10 February 2024 17:53
**To:** FinfishPC
**Subject:** Re licensing Deenish Salmon Farm.
**Attachments:** Lough Currane.docx

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Dear sir,s
Please find attached submission .
best regards
[redacted]

[redacted]

RE: Deenish Salmon Farm

Dear Sirs,

I wish to state my deepest concern at reissuing a License to this salmon farm at Deenish, Co Kerry. It is not my intention to reiterate the harmful effects this farm has on the environment and native salmonids there in.

It has been 3 years since I visited Waterville, prior to this six to eight trips per season was the norm, with each trip averaging two days. If we include boat hire, accommodation, food including social an estimate of €395 per trip is probably conservative, multiply this by six and we get an average of €2,370 just to Waterville and environs per season. Remember I am only one individual and regularly accompanied by friends to do likewise. One can readily see what revenue Waterville is losing out on. Fishermen will not travel to fish empty lakes. We all have a combined responsibility to restore seatrout stocks to Lough Currane and upper lakes.

It is common knowledge the detrimental element of salmon farms have on the natural environment. Deenish is no exception. As someone who is very passionate about our precious lakes and rivers and the preservation of same. I urge all concerned to cease salmon farming at Deenish and remove open cage farming going forward.

Let us preserve Lough Currane for our children and future generations to come.

Mise Le Meas

[redacted]

**From:** [redacted]
**Sent:** Saturday 10 February 2024 17:58
**To:** FinfishPC
**Subject:** Deenish Island Fish Farm Licence Renewal Application

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Dear Minister,
I wish to strenuously object to the renewal of this license and to any continued use of this location as a fish farm.
As a life long visitor and holiday maker to this beautiful part of our island, it has been both devastating and puzzling to watch the continuing collapse of the salmon and sea trout stocks returning to Lough Currane in recent times. It is obvious by observing the huge fall off in boats traversing the lake now that the stocks are just not there anymore. As a regular angler I can testify to the salmon and sea trout stock collapse and this has always coincided with the level of fish farm activity at Deenish Island. Having followed this matter down through the years and read at length the pros and cons of continuing the operation of this fish farm, I am in no doubt that this is the chief culprit for the collapse in wild salmon and sea trout stocks. While it's continued existence undoubtedly makes commercial sense to it's 'big business' operators, from a regional perspective this is totally outweighed by the resulting loss in tourism earnings. While from an environmental perspective a decision to deny the continued operation of this fish farm is in my opinion an absolute no brainer.
I fervently hope and pray that your decision is made in favour of the people, the wildlife, the environment and the long term local economy of the area by denying this application.

Yours respectfully
[redacted]

Sent from my Galaxy

**From:** [redacted]
**Sent:** Saturday 10 February 2024 18:44
**To:** FinfishPC
**Subject:** T06/202 Submission

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To: Minister for Agriculture Food & the Marine

I would like to submit my concerns and opposition regarding the plans for T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry. As a [redacted] marine biologist and ocean user as well as knowing the local angling community, I have serious concerns regarding the fish farm at Deenish Island, especially the expansion of this facility.

I have read the documents associated with the application for expansion and see a number of concerns as listed below:

1. In the EIA it states that there is **no negative impact on local population** - this is incorrect and I suspect there was no consultation with the local population in the region, because if there had been they would have input the correct information - this facility has had an influence on the local population of anglers and tourist businesses in the Waterville region since its installation especially through the sea lice infestation on the natural population of salmon and seatrout and reduced natural population meaning the once thriving lake tourism industry has flopped with a domino effect to the whole village and region regarding economy.

2. Concerns over salmon welfare and mixing with natural population

- Lepeophtheirus salmonis and Caligus elongatus sea lice infestations on farms have a direct impact on salmon and sea trout through disease (secondary infection), poor swimming ability thus heightening predator interaction, premature return by seatrout to freshwater to lose lice infestation, poor feeding ability resulting in poor body condition of salmon and sea trout that survive having a knock-on effect through reduced deposition of ova.
- Also Amoebic Gill Disease has reached epidemic proportions at Deenish and other sites. This can be passed to wild salmonids and we all know escapees can be a problem which reduce genetic fitness of wild salmon.
- Debris from the fish farm are periodically found on local beaches which makes one think that pens have broken up or been damaged during a storm - with increased extreme weather events this may become a bigger issue and there could be more potential for escapees
- welfare concerns as Deenish has extremely high mortality figures approaching 46%. Climate change with increased temperature fuels invasion of jellyfish, harmful algal blooms and also accelerates sea lice production. No place for open cage farming.

- Fish farm food overspill feeding native populations of fish and other marine organisms non natural sources of food in the wild

3. Concerns regarding legal obligations of the Irish government to meet EU HABITATS DIRECTIVE/ NATURE RESTORATION LAWS

- Deenish island is a well known area to see seals, risso's dolphins, common dolphins, porpoise and bottlenose dolphins, of which all are protected on the EU Habitats Directive, the installation could create disturbance to these cetaceans due to noise, anchor chains and traffic to the area. We know that MOWI (locally known as Silver King Seafoods Ltd.) have been found to use pingers and other Acoustic deterrent devices (ADD's) to a detrimental level in Scotland. How can we be assured this will not happen in this marine biodiverse region? MOWI mentioned in this documentary for over use of ADD's in Scotland to deter seals,,, and not reporting properly on use of them from around minute 12: https://youtu.be/YwRwkiQckCk?si=GJwBiysLWhKj_so5
- In the EIA, looking at the images from beneath the fish farm and proximity it is clear there is a layer of sludge from the intense salmon discharge and food that may drop to the seafloor, which will turn or may have already turned the area beneath the fish farm anoxic and potentially toxic for any biodiversity that may normally inhabit this area - not in line with the Nature Restoration Law
- Having an open pen salmon farm in such a rich marine biodiverse area, (SAC, NHA and more recently recognised globally for its contribution to international marine biodiversity with the Greater Skellig Coast Hope Spot designation) really goes against the Nature Restoration Law if we are already seeing detrimental effects to local fish populations and potential to impact the endangered Pearl Mussel which is found in the local salmon rivers.
- An Inland Fisheries Study on fish farm proximity to salmon and seatrout rivers has shown the detrimental effects of fish farms https://www.irishexaminer.com/opinion/columnists/arid-20438374.html again this would go against the EU Habitats Directive and Nature Restoration Law if this development was allowed in an SAC
- MOWI A.K.A Silver King Seafoods Ltd is currently in an EU courtcase for farmed Atlantic salmon cartel case which does not bode well or instil trust in the company operating according to EU regulations in a highly sensitive biodverse rural region https://ec.europa.eu/commission/presscorner/detail/en/ip_24_405

Other general concerns:

- Every year debris from the fish farm ends up on local beaches
- Accessibility to a safe harbour will be cut off by the new layout of pens obstructing Deenish Island Bay
- With the obstruction to the bay and increased fish loads this may alter the natural habitat of this bay in an SAC
- With the obstruction to the bay local recreational boat users and sea fishers will not be able to access the sheltered waters of Deenish Bay
- 
- There have been many studies reports and documentaries on how unsustainable and dangerous fish farms are, do we really want to be complicit in furthering this industry which is detrimental to our native species and marine biodiversity.

- Finally, [redacted] we are often asked what the circles are near the island when stopped at the viewpoint overlooking Derrynane, Deenish, Scarriff and Atlantic ocean, we tell them it's a fish farm and most often the tourists are upset to know that we have such an unsustainable industry in our pristine corner of Ireland.

I hope that you will take these concerns into consideration when evaluating Silver King Seafoods Ltd application to expand at Deenish Island.

Yours sincerely,
[redacted]

--

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 11:04
**To:** FinfishPC
**Subject:** Public Consultation T06/202

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Dear Sir,
In response to Public Consultation on Mowi's application to continue and further expand, their salmon farming activities east of Deenish Island in the Kenmare River, I wish to register my strong objection to the proposals and indeed to the continuation of any salmon farming at this location. My objections to this proposal are based on:

- The catastrophic decline in the sea trout stocks of Lough Currane directly attributable the location of the salmon farm and the activities of Mowi, previously Marine Harvest.
- The gradual decline of the wild salmon population of Lough Currane directly attributable the location of the salmon farm and the activities of Mowi, previously Marine Harvest.
- The economic damage suffered by individuals and businesses in the Waterville area specifically and the Iveragh Peninsula generally caused by the significantly reduced visitor numbers because of the decline in the Lough Currane fishery.
- The deleterious effects of the commercial fishing activities carried out to provide the fishmeal required to feed the farmed salmon.

That all of these issues are addressed in the Mowi Environmental Impact Assessment in a most unprofessional, incomplete, unscientific and disingenuous manner appears typical of the obfuscation, greenwashing and gaslighting tactics that Mowi have always used in both Ireland and other jurisdictions to justify their polluting and economically damaging business activities.

To provide general context before addressing each of the above points specifically; I am a recreational fly fisherman and have lived in South Kerry for the [redacted]. Before that I was a frequent and prolonged visitor to Kerry. I visited Waterville and flyfished on the Lough Currane system many times every year. Hiring boats from local businesses, paying fishing guides, staying in local guest houses and eating in local restaurants. Before the salmon farm was installed Waterville gave the impression of a thriving holiday town over much of the fishing season, February through September. On an average day if was not unusual to see at least 30 and perhaps sometimes 50 boats on the main lough utilised by fishermen from all over the world. Most were there to fish for the seatrout.

Friends from the UK and further afield would regularly come to visit me specifically to fish at Lough Currane. As soon as the salmon farm was installed the quality of the fishing deteriorated as has been the case throughout Ireland and the UK wherever a salmon farm has been installed close to the mouth of a river where once there were seatrout (one other example of many being the destruction of the Lough Maree fishery in Scotland and the subsequent economic decline in the area caused by the installation of salmon farms). I may now only fish at Lough Currane one day per year, and that is with no expectation of catching anything. At times in recent years it seems I have the entire Lough to myself, never seeing more than a handful of boats out fishing, even at what used to be the peak of the fly fishing season. None of my friends visit Ireland to fish anymore. We all travel to other places such as the UK, Canada and,

ironically given the ownership of Mowi, Norway. We spend thousands of euro's, pounds and dollars each year, much of which, in the absence of the salmon farm, we would be more than happy to spend in the Waterville area of Ireland. As a group, we are not alone in doing this as evidenced by the dramatically reduced numbers of visitors now fishing Lough Currane.

Everybody with even scant knowledge of the environment and fishing habitats knows that fish farms destroy wild fish and visitor numbers will not recover until the salmon farm is gone. As such the greenwashing publicity approach adopted by Mowi serves only to provide cover to the politicians, the ignorant and the gullible that allow, and in many cases encourage, their damaging practices.

To specifically address the points above:

**Sea Trout**

Lough Currane was world renowned as the finest sea trout fishery in Europe, until a salmon farm was installed at Deenish Ireland. The subsequent collapse of sea trout stocks is well documented. This is the consequence experienced wherever fish farms are installed in proximity to sea trout fisheries. The EIA presented in support of this application is woefully inadequate in its assessment of the impact on salmonoids generally and sea trout specifically. Indeed in the section 6.5.2 and 6.5.3 'Impact on Fisheries', sea trout are mentioned precisely twice, and one such reference is in the general introduction. There are no references to any scientific study related to the impact of salmon farms on sea trout populations or the huge amount of historical data available that demonstrates that impact. The one pertinent reference to sea trout in the EIA is that they remain in the coastal location and therefore are more susceptible to mortality from lice. The only mitigation offered is a vague and unsubstantiated plan to control lice. Mowi have demonstrated time and again within the Kenmare Bay and further afield they cannot, or choose not to, control lice to a level where wild fish populations are not impacted.

**Salmon**

The EIA referenced above is again wholly inadequate in its assessment of the impact of salmon farms on the wild salmon population and appears to have been written to confuse rather than to inform. The sole scientific study referenced in any detail deals only with the issue of lice and recognises that lice in the wild kill up to 20% of the salmon that would otherwise return. The conclusions that then seem to be drawn from this study are bizarre; 95% of salmon die at sea, in the wild 20% of those that would otherwise return die from lice anyway, so lice from a salmon farm killing a few more doesn't really make a difference. This apparent and callous disregard for a species already under huge environmental pressure is completely in line with Mowi's general attitude towards the protection of wild fish stocks, and the environmental impact of their activities overall. Those that put their name to this report should be ashamed.

In other jurisdictions, despite the expensive greenwashing and legal efforts of Mowi, the impact of salmon farms on wild salmon, and the economies of the coastal communities that rely on them, has been recognised and is being mitigated. The impact is not just from lice, but also disease, inter breeding, pollution, etc. and is well documented over the decades that Mowi have been in operation. Examples of this are:

**Argentina**, which also has world renowned recreational sea trout fisheries has banned salmon farming outright in its coastal waters in the areas of those fisheries

**Canada**, after years of decline in salmon runs to the Fraser and other river systems in British Columbia, Mowi has been forced to relocate salmon farms away from the migration routes. Initial anecdotal

evidence implies that salmon runs of some of the five species of Pacific salmon are already starting to recover.
**Scotland**, the Scottish Environmental Protection Agency has at last recognised the threat to its wild salmon population, which is on the verge of being categorised as endangered, and the huge recreational angling revenue that it brings. The Scottish Government is designating protection zones free from fish farms to protect young migrating salmon from the risk posed by sea lice from Mowi's farms. It is no surprise that Mowi are rigorously opposing this move but it seems set to be put in place.

I would urge the minister to look at the evidence available from around the world rather than a flawed Mowi EIA when assessing both the economic and environmental damage caused by fish farms in inappropriate areas generally and Mowi specifically.

**Economics in Waterville**
In the conclusions of the EIA I found one statement that I could agree with. 'Granting Mowi this licence will have no impact on tourism'. I agree with this statement because the damage inflicted by Mowi on the angling tourism that used to be the life blood of the town has already happened. I personally know ghillies, boat owners and guest house owners who once sustained reasonable businesses on the basis of the sea trout fishing. There are no livings now made on the basis of angling, the number of people visiting to go fishing is inadequate. The Minister should be considering how the recovery in tourism once the salmon farm is removed will add to the economy and bring life back to the town. As a real example Waterville, as a centre for angling excellence, used to boast a fine shop selling fishing tackle. With no visitors to sustain it, it closed a few years ago. In contrast to the damage caused to the economy of Waterville by the salmon farm, the economic benefits would appear to be very limited. The farm will be serviced from a base on the Beara peninsula rather than from Waterville so this would seem to severely limit any full time employment opportunities.

**Sustainable Feed**
The EIA claims that feed for the salmon comes from offcuts and waste from fish caught for human consumption. This again is not entirely true. The inshore waters of Cork and Kerry have been devastated by Pair Trawling targeting sprat as feedstock for the fishmeal plant in Killybegs, Donegal. It is reasonable to assume that Mowi's proposal to quadruple production will require four times as much fish feed. This can only lead to pressure to target more wild fish such as sprat and sand eel as sources for fishmeal both around Ireland and overseas. There should be no expansion of fish farm capacity until truly sustainable source of feed have been identified and secured.

**In conclusion**
I would urge the Minister to consider all of the available evidence about the damage done to local economies and wild fish when fish farms are inappropriately located. The fish farm is located where no fish farm should ever have been allowed in the first place.

In the event that, despite all evidence available, the Minister determines there may be any benefit to granting Mowi the licence requested, it is my understanding that under the EU habitats Directive the Precautionary Principal must be applied and the application for the licence rejected.

I have reviewed the EIA presented to support Mowi's application. Based on the content and conclusions I am surprised that a seemingly professional organisation has allowed its name to be associated with such an incomplete and disingenuous document. In my view, as someone who spent many years as a

[redacted] with extensive experience reviewing similar documents, the EIA should be discounted in its entirety as scientific justification for the licence approval.

Mowi's application must be rejected, the farm removed and the seabed restored to its previously pristine condition.

Yours sincerely,

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 11:45
**To:** FinfishPC; Minister
**Subject:** Submission related to Aquaculture Licence T06/202
**Attachments:** Submission Currane Fisheries T06_202.pdf

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Hi,

On behalf of Currane Fisheries please find attached our submission with respect to the review and renewal of Aquaculture license T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry

[redacted]

8th February 2024

**Review and renewal of Aquaculture license T06-202 Silver King Seafoods Ltd**

**Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry**

**Licence Site Ref: T6/202**

**Introduction**

Currane Fisheries Ltd. is a not-for-profit community group run by local volunteers in the Waterville area adjacent to this proposed development. We run fisheries in the upper lakes in the Waterville/Currane catchment including lakes Derriana, Cloonaughlin, Namona and the river Cummeragh and Inny. We also operate a small salmon hatchery to help sustain salmon numbers to the Currane catchment.

Angling in the Currane system has collapsed since the opening of the salmon farm at Deenish in 1990. What was once a fully sustainable fishery and important tourism attraction has almost disappeared. While the fishery was important for spring salmon fishing it was as a seatrout fishery it was famous due both to the large population and also the large size of the seatrout. Waterville seatrout are now known as genetically unique in that they are long lived and can spawn a number of times. They are understood to be a relict species originating before the last ice age. In our opinion they are deserving of of a higher conservation status.

There was a marked recovery in seatrout stocks in the years 2005-2010 which coincided with the years when there was no salmon aquaculture in the Kenmare bay area. However, since 2011 and the resuming of stocking at the Deenish site there has once more been a complete collapse of stocks to the Currane fishery. Specimen seatrout (>6lb wt.) have disappeared, catch and release has been

introduced by IFI in order to protect the few remaining stocks. Salmon stocks have also reduced significantly with particular concern for the status of spring stock which are close to being put under mandatory conservation control due to low numbers.

We strongly object to the renewal of this licence and make the following observations and objections-

**The legal basis of renewal**

We would query the legal basis for the renewal of the licence. The licence was revoked by Minister Creed due to overstocking in 2019. The operator has continued to operate at the site on the basis of an appeal to ALAB which has not given a determination to date, five years later. There are a number of issues here –

- Does ALAB have basis in law to hear an appeal on a revoked licence?
- Why has it taken so long to finalise the appeal?
- What is the legal basis of this renewal application of the licence, given that it is revoked and under appeal?

**History of MOWI Operations on Site**

In our opinion notwithstanding our fundamental objection to the renewal we have considerable concern about the suitability of MOWI to operate within the conditions of a licence which they have demonstrably failed to do in the past. In our opinion there are defeciencies in the NIS which will will be exagerrated by the applicants inability to comply with licence conditions.

**Location in an SAC & SPA**

The Deenish farm site is located within the Kenmare Bay SAC (002158) and the farm is also located within the confines of the Deenish Island and Scariff Island SPA (004175). Adjacent SACs include the Blackwater River (Kerry) SAC (IE0002173), Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC (IE0000365) (in which the Currane/Waterville Cathment is located), Ballinskelligs Bay and Inny Estuary SAC, (000335) and the Glanmore Bog SAC (001879).

The qualifying interests of two of these SAC's include both wild Atlantic salmon*, Salmo salar* and freshwater pearl mussel, *Margaritifera margaritifera*. It is not credible that the proposed developemnt will not have a significant impact on these Natura sites. As thing stand the Inny river is under conservation measures for atlantic salmon (catch & release), while the Blackwater river is closed to salmon fishing due to not reaching it's conservation limit. Both the Cummeragh and Glenmore rivers in the Currane cathments contain important freshwater pearl mussel populations and the Currane catchment is one of eight priority catchments nationally for their conservation. Freshwater pearl mussels are in poor conservation status within the catchment and due to salmonids being a glochidial host within their life cycle the continued decline of seatrout populations due to the impact of salmon farming is most likely to affect their regeneration. This is not addressed sufficently in the NIS.

**Disease**

The imediate concern with disease impacts to wild salmonids is sea lice proliferation. The two species of concern are *Lepeophtheirus salmonis* and *Caligus elongatus*. The later can impact non-salmonids as well but it's impact on salmonids in high salinity water is not well understood and render the NIS deficent. The same applies to the poor understanding of amoebic gill disease in that it's impact on wild salmonids is also poorly understood and may be as significant as sea lice to their

decline. The effect of escapees from salmon farms on the genetic integrity of wild fish is of concern; the fact that no escapees have been reported from the Deenish site to date is simply not credible.

Similarly it is not credible to suggest that there is not a significant issue with nutrients emanating from a large proposed biomass on this proposed project. There has been issues in recent years with algal blooms in the area of the site which most likely is related to nitrates emananting from the salmon farm. These anoxic conditions and their impact on ecology is not well understood. There is no intensive agricuture in the area that could be responsible for this eutrophication.

In conclusion we would urge that this licence renewal is not approved. Salmon farming has displaced and destroyed a valuable sustainable angling tourism industry in the Waterville area and we would have a major concern that it would never recover were this licence as propsed be renewed.

[redacted]

[redacted]

*Directors Currane Fisheries.*

**From:** [redacted]
**Sent:** Sunday 11 February 2024 12:21
**To:** FinfishPC
**Subject:** Reference T06/202 AquacultureLicence &Foreshore Licence for salmon farm at Deenish Island,Co.Kerry

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Dear Minister,
I wish to object to the above licence application.
I have fished the Lough Currane system since the early 1980's.I enjoyed wonderful sea trout fishing on Lough Currane and on the Upper Lakes,Derriana,Na Mona and Cloonaughlin.The Upper Lakes are all linked to Currane by the Cummeragh River.

Since the opening of the Deenish Fish Farm there has been steady yearly decline in sea trout stocks save for a period,2004-2010,when the farm closed.Since MOVI
reopened the farm in 2010 the impact on sea trout fishing has been devestating.The run of "Juniors",seatrout returning from sea to spawn after one year at sea,in July and August is no more.At this time there would be a flotilla of boats on the lake Sadly, this August Bank Holiday Monday 2023 saw just a handful of boats on Currane.At our moorings none of the 20 boats were out.

There is no place for a fish farm at Deenish.Our wild fish congregate at the cages to feed.They become infested with sea lice,Lepotherms salmonis and Caligulus elongatus.I have caught emaciated, lice infested seatrout.Lice infestation weakens them affecting their ability to swim and feed prompting a premature return to fresh water to rid themselves of lice.Weakened they die .

Furthermore,the rise in water temperature has had a serious impact on salmon in the the Deenish cages. This rise results in jellyfish invasion,algae bloom and increased sealice infestation.Annual mortality rates are in excess of 40%.

MOVI's licence should not be renewed.They are in breach of their origional licence.Why grant a licence to such an irresponsible company.The continuation of caged salmon farming at Deenish will see the extinction of our Lough Currane fishery.This will be the loss of what was the best seatrout fishery in Europe.
Minister please do not grant this licence.

[redacted]



Virus-free.www.avg.com

From: [redacted]
Sent: Sunday, February 11, 2024 1:11 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Submission for T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application east of Deenish Island, Co Kerry

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Dear Minister/Sir,
I am presently abroad and have only just been informed of the above application and would like to submit my concerns.

Firstly I would like confirmation that the local population have been sufficiently consulted before this application was submitted and that the majority of the local community are in agreement that it will have no negative impact on the local community.

I have been an ocean sailor , diver and lover of the sea and in particular the south and west coasts of Ireland and the west coast of Scotland for most of my life and in the latter years have spent much time sailing the south coast of West Cork and Kerry and am familiar with the coastal waters and islands.

It is my belief that the area from Dursey Island to north of the Blasket Islands should be treated as a special area of marine conservation. Do we not realize what a very special coast we have and how important it is to preserve it for the marine life and bird life that we have there? Fish farms do nothing for the local marine life and add little to employment in the area and are an eyesore and pollutant in one of our most sought after and special areas. I am a very frequent visitor to the Derrynane area and have spent many hours in the winter months picking up litter from its beautiful beaches and much of what I find, particularly on the beach near Derrynane pier, is netting and other debris from the fish farm.
I would therefore like to oppose the above mentioned application Yours Sincerely [redacted]

[redacted]

Sent from my iPad

From: [redacted]
Sent: Sunday, February 11, 2024 2:28 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Gov.ie T06-202 silver king seafoods Ltd Aquaculture/Foreshore licence application, east of deenish Island

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Dear Sirs,
I would like to strongly object to the issuing of a licence for fish farming at deenish island.
[redacted]
Since fish farming started at deenish Island fish stocks have declined rapidly and now the lake is almost dead and also the angling tourists have disappeared .
It it very sad to see people in government to allow a fish farming in this unique location.
Your faithfully
[redacted]

From: [redacted]
Sent: Sunday, February 11, 2024 2:58 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Cc: [redacted]
Subject: T06/202 Silver King Seafoods Ltd Aquaculture/Foreshore License Application, east of Deenish Island Co.Kerry

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To: Minister for Agriculture Food and the Marine and relevant staff,

Dear Sirs,

I wish to protest and object in the strongest possible terms to the above referenced renewal application to operate an open-pen salmon farm at sea. I join with Salmon Watch Ireland and others whose detailed objections are known to you.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 17:50
**To:** FinfishPC
**Subject:** Reference T06/202 Aquaculture Licence & Foreshore Licence A pplication for salmon farm at Deenish Island
**Attachments:** Deenish Fish farm.pdf

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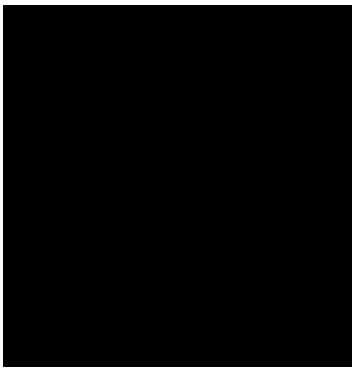
Dear Minister

I wish to register an objection to the planned expansion of the salmon farm at Deenish Island Co Kerry.

Please find attached letter outlining the reasons for my objection.

yours sincerely

[redacted]



Minister for Agriculture, Food and the Marine,
Aquaculture and Foreshore Management Division,
National Seafood Centre,
Clogheen,
Clonakilty,
Co Cork
P85 TX47

12th Feb 2024

Dear Minister,

**Reference T06/202 - Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

I wish to object to the above licence application for the following reasons:

The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson *et al.*, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer-reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson *et al* and move to accept the best available scientific advice.

Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Yours sincerely





**From:** [redacted]
**Sent:** Sunday 11 February 2024 17:56
**To:** FinfishPC
**Subject:** T06/202 Objection
**Attachments:** 2024-02-11-Deenish-objection-DW.pdf

**Importance:** High

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Dear Sir/Madam

Please find attached a letter objection to the planning application (Ref T06/202).

Best regards
Dave
--

[redacted]

[redacted]

11 February 2024

Minister for Agriculture,
Food and the Marine,
Aquaculture and Foreshore
Management Division,

*National Seafood Centre,*
*Clogheen, Clonakilty,*
*Co Cork P85TX47*

Our reference: T06/202-objection-[redacted]



Dear Sir / Madam

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,

I wish to object to the above licence application for the following reasons:

1. The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.
2. In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.
3. In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.
4. The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.
5. Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40%

are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6. The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.
7. Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Yours Sincerely



**From:** [redacted]
**Sent:** Sunday 11 February 2024 19:53
**To:** FinfishPC
**Subject:** Deenish fish farm

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[redacted]

19:47 (1 minute ago)

to FinfishPC

Dear sir, We strongly disagree with the renewal of the licence for the Deenish fish farm.over the last few years we have have noticed the lack of fishers coming to us the reason being the lack of salmon and seatrout and is only getting worse [redacted])we are aware as are a lot of others here the this fish farm is coursing a lot of problems with the local sea life.We strongly support the work of Salmon Watch Ireland so please take notice of this email.

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 20:15
**To:** FinfishPC
**Subject:** T06/202 xxxxxx

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Dear Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co. Cork, P85 TX47,

I am writing in relation to the application for a license and expansion of the salmon farm on the foreshore east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry (T06/202)

I am completely opposed to the granting of a license and the expansion of the salmon farm in question for a number of reasons:

1. The sea trout and wild salmon stocks in Lough Currane have been decimated by the activities of the salmon farm in question.
2. This has caused a collapse of the fishing related tourism in Waterville (previously thriving, now pretty much dead).
3. The fish are fed on fishmeal partially made from sprat caught in coastal bays by large trawlers. This trawling has caused a catastrophic decline in fish, marine mammals and sea birds in all bays affected but particularly in the Kenmare Bay where I live.

To grant this license would be scandal.

Thank you in advance for finding against this application and protecting the tourism and fishing industries of the Iveragh Peninsula and the marine heritage of the Kenmare Bay.

Best wishes,

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 20:31
**To:** FinfishPC
**Subject:** Proposed extension to Delish Salmon Farm, Co. Kerry

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To whom it may concern,
It is with shock and disbelief that I have heard of a proposal by Mowi to seek an increase to farmed salmon production at their controversial Delish Island site. Given that only a few years ago, a closure order was issued by the then minister for agriculture and fisheries, due to constant regulation and licence breaches, it defies credulity that any continued production of salmon at this site continues.
In a relatively short period of time, the world class angling on the nearby Lough Currane system had all but collapsed and all the associated jobs and economic input has been lost with it. All evidence point to the Delish salmon farm. While Incredible damage has already been done, a full closure of Delish salmon farm would give us much needed hope for the future.
In the interest of the local economy and local livelihoods I would urge you to turn down any extension to salmon farm and instead push for a full closure of the current farm.
Yours sincerely,
[redacted]

From: [redacted]
Sent: Sunday, February 11, 2024 8:35 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: 0213

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I want to object to the renewal of the mowi licence for deenish ref T06202 for the interest of our wild sslmon and seatrout stocks please and thank you [redacted]
Sent from my iPhone

From: [redacted]
Sent: Sunday, February 11, 2024 8:37 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to granting licence renewal

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licence ref No T06/202

Dear Minister
I want to strongly object to the renewal of MOWI Devenish Licence application number T06/202 As the Licence was revoked for overstocking by MOWI in 2019 by former Minister of Marine Mr Michael Creed This licence should stay revoked MOWI should not be rewarded from breaking the condition of there Licence

The Scince is there Minister
Fish Farms are endangering the wild Salmon Thank you Regards [redacted]
Sent from my iPhone

From: [redacted]
Sent: Sunday, February 11, 2024 8:59 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection

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To whom it may concern,
I wish to object to the renewal of the MOWI Deenish licence application reference ;T06/202.
This licence was revoked in 2019 by the minister of the marine and should stay revoked !!
Regards
[redacted]
Sent from my iPhone

**From:** [redacted]
**Sent:** Sunday 11 February 2024 21:07
**To:** FinfishPC
**Subject:** Application T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,
[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 21:32
**To:** FinfishPC
**Subject:** Fwd: Licence Ref :No TO6/202

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---------- Forwarded message ---------
From: [redacted]
Date: Sun, 11 Feb 2024, 8:57 pm
Subject: Licence Ref :No TO6/202
To: <finfishPc@agricilture.gov.ie>

Minister for Agriculture food and the Marine , I want to strongly object to the renewal of the MOWI Deenish licence application Ref:No TO6/202 as this licence was revoked in 2019 for overstocking by MOWI,
by former Minister for Marine, Michael Creed, and surely MOWI should not be rewarded for breaking the conditions of their Licence !!!!

[redacted]

Submission/Observation #0218 invalid in accordance with Regulation 9(2) of the Aquaculture (Licence Application) Regulations, 1998, as amended.

From: [redacted]
Sent: Sunday, February 11, 2024 9:50 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Licence Ref: No. T06/202

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Dear Minister,

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.
MOWI should not be rewarded for breaking the conditions of their licence.

Regards,

[redacted]

Sent from my iPhone

From: [redacted]
Sent: Sunday, February 11, 2024 10:00 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

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Dear Sirs,
I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,
[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 22:09
**To:** FinfishPC
**Subject:** MOWI Deenish licence application Ref:No. T06/202.

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To: Minister for Agriculture, Food and the Marine.

Dear Minister,

I object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. This licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

Kind regards,

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 22:15
**To:** FinfishPC
**Subject:** Re Application T06/202 To whom it may concern, I wish to object in the strongest possible terms to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for ...

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[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 22:27
**To:** FinfishPC
**Subject:** 0223

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co. Cork, P85 TX47,

I am writing in relation to the application for a license and expansion of the salmon farm on the foreshore east of Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry (T06/202)

I am completely opposed to the granting of a license and the expansion of the salmon farm in question for a number of reasons:

1. The sea trout and wild salmon stocks in Lough Currane have been decimated by the activities of the salmon farm in question.
2. This has caused a collapse of the fishing related tourism in Waterville (previously thriving, now pretty much dead).
3. The fish are fed on fishmeal partially made from sprat caught in coastal bays by large trawlers. This trawling has caused a catastrophic decline in fish, marine mammals and sea birds in all bays affected but particularly in the Kenmare Bay where I live.

To grant this license would be scandal and an insult to the local community.

Thank you in advance for finding against this application and protecting the tourism and fishing industries of the Iveragh Peninsula and the marine heritage of the Kenmare Bay.

Best wishes,

[redacted]

Sent from my Galaxy

From: [redacted]
Sent: Sunday, February 11, 2024 10:37 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Renewal of Licence Ref:No. T06/202

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To whom it may concern,

I object to the renewal of the King Foods / MOWI Ireland Deenish licence application Ref:No. T06/202.
It is my understanding that this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed.

As this licence was revoked for breaching its conditions, this licence should not be renewed, particularly in view of the catastrophic decline of the sea trout population in nearby Lough Currane.

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 22:38
**To:** FinfishPC
**Subject:** Objection to MOWI Deenish licence application T06/202

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I object to the the MOWI Deenish licence application Ref: No. T06/202. As this licence was revoked in 2019 for overstocking by former Minister of the Marine Michael Creed, it should remain this was and MOWI should not be rewarded for breaking the terms of their licence.
Over the last 20 years I have personally witnessed the decline of salmon runs on Clew Bay as a result of salmon licence infestation (Leproterus salmonis), it is a major problem anywhere a commercial salmon farm operates and on Clew Bay, the farm in question is Clare Island Salmon Farms, also operated by MOWI. As a Fishery owner, I strongly object to any licence renewal on either of these salmon farms or any other operated or managed by MOWI.

[redacted]

[redacted]

[redacted]

From: [redacted]
Sent: Sunday, February 11, 2024 10:50 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Licence Ref:No T06/202

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I would like to object to the renewal of the MOWI Deenish licence application Ref:T06/202 as it was revoked due to overstocking by MOWI in 2019 by the then Minister for the Marine,Michael Creed and should stay revoked as MOWI obviously cannot be trusted to adhere to licence conditions.
Yours faithfully,
[redacted] Corofin Fishing Association).
Sent from my iPhone

From: [redacted]
Sent: Sunday, February 11, 2024 10:58 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref T06/202

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Hello Minister
I want to object to the renewal application Ref No 706/202 by MOWI.
Minister Creed revoked their license for overstocking in 2019.
They continued to operate ignoring our governments ruling.

[redacted]
Sent from my iPad

**From:** [redacted]
**Sent:** Sunday 11 February 2024 23:22
**To:** FinfishPC
**Subject:** Reference T06/202 Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry

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Dear Minister,
I wish to object to the above licence application for the following reasons:
1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.
2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.
3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17 th January to 12 th October annually, has been lost to the local economy.
4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.
5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.
6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.
7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.
The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

Virus-free.www.avg.com

**From:** [redacted]
**Sent:** Sunday 11 February 2024 23:28
**To:** FinfishPC
**Subject:** Fish farm application Kerry

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Dear Minister for Agriculture, Aquaculture and the Marine

I was devastated to learn of an application for a fish farm between Kenmare and Ballinskelligs Bay, application number: T06/202

[redacted] Waterville which has already seen its tourist fishing industry gutted by a local fish farm. The pollution of our rare, beautiful ecosystem is severely threatened by short sighted profiteering as represented by many in the fish farming industry.

There is plenty of evidence that the kind of aquaculture represented by the applicant is destructive to the local environment and for a small rural community [redacted], that represents our livelihood as well as our hope for the future.

I object strongly to this and speak to many others who feel the same. We are prepared to fight this to protect our bay.

Please do not grant the applicant's request.

Yours faithfully

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Sunday 11 February 2024 23:30
**To:** FinfishPC
**Subject:** Licence Ref:No. T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

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From: [redacted]
Sent: Sunday, February 11, 2024 11:39 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Fish Farm T06/202.

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11-2-2024

I want to object to the renewal of the MOWI Deenish licence application Ref no.T06/202 .
As this licence was revoked by former Minister for the marine Michael Creed, it should stay revoked .
MOWI should not be rewarded for breaking conditions of their licence.

[redacted]

Sent from my iPad

**From:** [redacted]
**Sent:** Monday 12 February 2024 00:01
**To:** FinfishPC
**Subject:** 0232

**Categories:** Filed to eDocs

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I object to the disgusting behaviour of the Green Party and the Irish government in renewing the licence for the MOWI Deenish Ref. No.T06/202 as this licence was revoked for overstocked by MOWI in 2019 by former Minister for Marine, Michael Creed. It should remain revoked. What sort of a message is this giving? Allowing to operate with impunity in this time of environmental jeopardy.
Regards,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 00:09
**To:** FinfishPC
**Subject:** Ref:No. T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 00:53
**To:** FinfishPC
**Subject:** Ref:No.T06/202

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I want to object to the renewal of the MOW! Deenish Licence application Ref:No. T06/202.
As this licence was revoked for overstocking by MOW in 2019 by former Minister for the Marine Michael Creed, it should stay revoked.
MOW! should not be rewarded for breaking the conditions of their licence.

Signed
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 06:05
**To:** FinfishPC
**Subject:** 0235

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To whom it may concern,

I object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

This licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Regards
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 06:41
**To:** FinfishPC
**Subject:** Ref No T06/202

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I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 7:39 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref:No. T06/202

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Attn of Minister for Agriculture, Food and the Environment

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Please take this request into consideration.

Yours sincerely

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 07:45
**To:** FinfishPC
**Subject:** T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry

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This license should not be granted it is destroying our sensitive ecology and out future

**From:** [redacted]
[redacted] 12 February 2024 07:56
**To:** FinfishPC
**Subject:** 0239

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I want to object to the renewal of the Deenish licence application MOWI ref number TO6/202

**From:** [redacted]
**Sent:** Monday 12 February 2024 08:18
**To:** FinfishPC
**Subject:** 0240

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As this licence was revoked for overstocking by MOWI in2019 by former Minister for the marine, Michael Creed,it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 08:41
**To:** FinfishPC
**Subject:** 0241

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.
As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 09:13
**To:** FinfishPC
**Subject:** licence Ref:No. T06/202

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licence Ref:No. T06/202

FAO - Minister for Agriculture, Food and the Marine

I want to object to the renewal of the MOWI Deenish licence application Ref: No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Yours sincerely

[redacted]

Sent from Mail for Windows

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**From:** [redacted]
**Sent:** Monday 12 February 2024 09:16
**To:** FinfishPC
**Subject:** Ref No: T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed: John & Pauline Lee

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 09:31
**To:** FinfishPC
**Subject:** Ref: no. T06/202

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Dear minister,

I want to object to the renewal of the MOWI Deenish licence application Ref: No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former minister for the marine Michael Creed, it should stay revoked. MOWI should not be rewarded for the breaking of the licence conditions. These farms have been shown on multiple occasions to have destroyed salmon and sea trout stocks. The micro plastics associated with the feeding routine are producing sick fish that are not fit for eating. The pollution from the feed itself and the copper materials will last for decades if not over a hundred years. Sadly the entire economy of this area has been decimated because thousands of anglers no longer spend in the area due to the decline of salmon and sea trout. All this for a few jobs. Shame

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 09:55
**To:** FinfishPC
**Subject:** Licence Ref:No. T06/202

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Good Morning Minister

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 10:14
**To:** FinfishPC
**Cc:** anne.rabbitte@oireachtas.ie
**Subject:** T06/202 Objection

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**Dear Sir**

**I want to object to the renewal of the** Mowi (ASA) Deenish licence application ref no TO6/202 ,MOWI formerly known as Marine Harvest ASA, is the Norwegian conglomerate seafood company with operations in various countries which is purely profit driven & which precedence has shown has broken the conditions of its license on numerous occasions

**Given Mowi a multimillion value company's complete dereliction of not alone its Irish statutory & EU ecological duties for using & investing in modern technologies available to MOWI and production strategies to mitigate the effects of sea lice and disease it is alarming that the company continues to operate as before with porous open net technologies.**

**This intense type of farming, with no physical barrier separating it from the surrounding ocean, has been causatively linked to the virtual elimination of sea trout stocks in Ireland, Scotland and Norway. The effect on salmon is now better understood and various studies identify & validate that salmon spawning stocks can be reduced by up to 70%.**
**These effects on salmon and sea trout relate to both disease and the effects of sea lice infestation from farms which will act as the catalyst towards the virtual wipe out of the Irish game fisheries including brown trout in the future. Yes, the long term effects are that dangerous**

**This license was previously revoked by former minister for the Marine Michael Creed given the cavalier disrespect shown by MOWI & its lack of respect for the Irish ecological & fishing preservation practises there were good reasons to revoke their license & these reasons still are the same except its unknown how much damage has been done by the failure to close this catastrophic Deenish fishery 3 years ago as originally intended, as this license was previously revoked for overstocking by MOWI in 2019 by Minister Creed & validates the premise that this Norwegian company cannot be trusted given this & their past record.**

**Accordingly given the above I recommend that their license be permanently revoked as MOWI is not the type of company we want in Ireland which damages Irelands green credentials & a company should not be rewarded for breaking the conditions of its original license**

Kind regards

[redacted]



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[redacted]*, therefore, does not accept liability for any errors or omissions in the contents of this message which arise as a result of email transmission.*

**From:** [redacted]
**Sent:** Monday 12 February 2024 10:19
**To:** FinfishPC
**Subject:** Ref.no T06/202

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I object to the renewal of the MOWI Deenish licence application ref.no T06/202. This licence was revoked in 2019 by Minister Michael Creed,MOWI should not be rewarded for ignoring the conditions of thir last licence.

[redacted]

Sent from Mail for Windows

**From:** [redacted]
**Sent:** Monday 12 February 2024 10:31
**To:** FinfishPC
**Subject:** REF T06/202 public submission/observation - PLEASE DECLINE THIS APPLICATION AND CLOSE THIS FARM

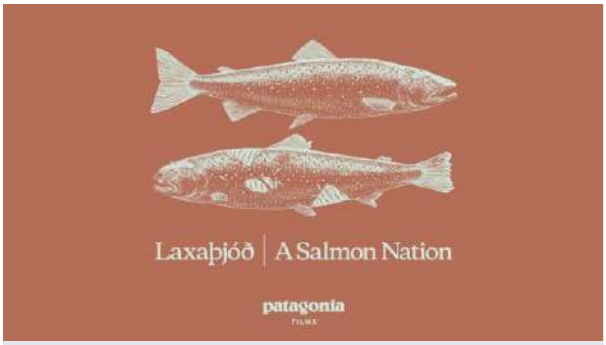
**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co. Cork, P85 TX47

The fish farm at Deenish is destroying wild Salmon and other wild fish stocks, damaging nature, damaging health, damaging tourism, causing losses of jobs and livelihoods. It is also eroding the trust and belief that Ireland as a country is protecting its world renowned natural beauty and care for animals and futhermore having a global positive impact on the environment. Being forward thinking leaders and not being afraid of big and difficult decisions grounded in what is good and what is just is the core of any community and this is an opportunity to stay true to these values by closing this farm.

The mere fact is has been operating without a license for 5 years and exceeding it's previously approved farming quotas by over 100% is hard to believe, hard to explain and hard to accept…but unfortunately this is a fact. Not only should it be closed, it should be charged and held responsible and any funds for recovery of the damage should be sought from the owners.

Here is a film example of the destrituon and impact and it features the very company that has submitted this application:




Laxaþjóð | A Salmon Nation - Full Film
youtube.com

Kind regards,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 10:38
**To:** FinfishPC
**Subject:** Ref. No. TO6/202

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I wish to object to the renewal of the MOWI Deenish licence application Ref. No. T06/202. This licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed and should stay revoked.
MOWI should not be rewarded for breaking the conditions of their licence.
Yours,

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 10:45 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Submission on Licence Application T06/202

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To whom it may concern,

I, [redacted], wish to make a submission on the Aquaculture/Foreshore Licence application T06/202 which will be located east of Deenish Island, Co. Kerry.

I wish to point out that this application is incomplete as it does not contain a stage 2 Appropriate Assessment (AA) as required by the Appropriate Assessment screening determination made by Minister McConalogue on the 15th of November 2023. The developer has carried out an Environmental Impact Assessment (EIA), a Natura Impact Statement (NIS), an Annex IV Risk Assessment, and a screening for an AA, however since the Minister's determination of November 2023 no AA has been carried out. The Annex IV Risk Assessment did not look at species such as the Otter (Lutra lutra) and the Harbour seal (Phoca vitulina) which are protected under the Habitats Directive for Kenmare River SAC (Special Area of Conservation)

In 2019, the developer was found to have twice the licenced volume of salmon inside the fin fish farm on this site, however the developer continued to operate. The developer now wishes to increase the tonnage of salmon held at the farm from 500 tons to 2,200 tons, and increase the licence area from 14.5 hectares to 33.5 hectares. Given the developer's cavalier attitude towards licence conditions and given that this application intends to increase twice in area size and four times in volume, what guarantee do we have that the developer will hold to the licence conditions and how relevant are the impact assessments when the developer is likely to go over estimated production levels.

I urge the Minister to not grant this licence. Salmon farming is an unsustainable, destructive, heavily polluting enterprise which in my view is not in the best interest of our environment or the people of Ireland.

Unsustainable:
It takes 5kg of wild fish to produce 1.1kg to 1.5kg of high protein fish pellet, which in turn produces 1kg of finished farmed salmon. One of the fish used as fin fish food is sprat. Sprat fishing is at present completely unregulated, using a 16 millimeter net to catch everything in almost every bay and inlet in Ireland. The impact of this fishery goes far beyond the tonnage of sprat landed because sprat is a forage fish which other marine species (commercial and non commercial species) need to survive. The by catch in this fishery is significant. The Sea Fisheries Protection Authority (SFPA) have noted that the figures relating to sprat caught for human consumption versus sprat caught for fish farm consumption have been artificially tweaked and are unreliable.
Over the last number of years, millions of wild wrasse have been caught live and put into the salmon cages to act as cleaner fish. This has had an adverse impact on Ireland's marine ecosystems. Again wrasse like sprat isn't a quota species however the unsustainable nature of the sprat and wrasse fisheries, connected to fin fish farming is undeniable.

One of the diseases associated with salmon farming is Amoebic Gill Disease (AGD). The treatment of this disease requires huge volumes of fresh water to be abstracted out of nearby lakes and/or rivers, I note that locations for water abstraction associated with this licence application have been omitted...

Destructive:
Sea lice - The current monitoring of sea lice numbers by the Marine Institute is completely inadequate. Information on types and quantities of chemicals used on fish farms to combat pests and diseases in Ireland, are held by the developers as they are commercially sensitive, how can a regulatory authority allow an industry to self police itself in such a way and still maintain it's obligation to protect the public's health... Salmon farms harbour many diseases, the issue with this is the spread of these diseases to wild stocks of salmonids, causing large losses to wild stocks and having a severe detrimental impact of other associated species such as the fresh water pearl mussel.

Heavily Polluting:
The chemicals used to treat farmed salmon ends up in the marine environment. The fresh water used to treat the salmon gets dumped at sea in enormous volumes, no effects have ever been monitored. There are many anecdotal accounts of divers observing the mountains of excrement under the salmon cages.

Given that Ireland's seawater temperatures are slowly rising and that salmon are a cold water fish species it is inevitable that the very high mortality rates that we've seen in salmon farms in the last number of years will increase. It is dishonest that the mortality figures for salmon farms in Ireland do not include fish that have died from non notifiable diseases such as Salmonid Rickettsial Septicaemia (SRS). It is high time that the Department of Agriculture, Food and the Marine start acting as a regulator rather playing the role of co-conspirator.

Thank you for allowing me to make this submission. I feel that this application is incomplete, (lack of stage 2 Appropriate Assessment) information such as where the food source for the salmon might come from would also be very useful for a licensing authority, to get a full impact picture. No indication as to where the developer is going to abstract the millions of liters of freshwater needed in the duration of this licence... For all the hundreds of hours spent on creating generic impact assessments this application lacks any real understanding of the damaging impacts of salmon farms on the Irish marine environment and the livelihoods that depend on it.

Kind Regards,
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 10:50
**To:** FinfishPC
**Subject:** Ref:No. T06/202

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I object to the renewal of the MOWI Deenish license application Ref:No. T06/202.

As this license was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their license.

[redacted]

Submission/Observation #0252 invalid in accordance with Regulation 9(4) of the Aquaculture (Licence Application) Regulations, 1998, as amended and shall not be considered in accordance with Regulation 9(5) of the Aquaculture (Licence Application) Regulations 1998, as amended.

**From:** [redacted]
**Sent:** Monday 12 February 2024 10:53
**To:** FinfishPC
**Subject:** 0253

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With regards to application T06/202 I wish to object to the application . It wad already refused by the previous minister and should not be considered again.

[redacted]

**From:** Norma Moriarty <moriartynorma@gmail.com>
**Sent:** Monday 12 February 2024 11:00
**To:** FinfishPC
**Subject:** Licence Site Ref: T6/202

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Renewal and Review of Licence for Deenish Island, Fish Farm Co.Kerry

A Chara,

I am a local representative for the Kenmare MD area and from Waterville in Co Kerry. I wish to convey both the fears and concerns of the many constituents that have made contact with me and my own concerns in respect of the above referenced Licence Application. In the first instance it is very hard to understand why an operation that has had its licence removed due to breaching its conditions can still continue said practices while an appeal to that decision is ongoing and has been so for 6 years.

The unanimous feeling of those who have made contact with me is to have open cage farms ended, especially as there is the technology and capacity to carry out Fish Farming in a way that does not negatively impact the marine life and ecosystem on which we all depend. Salmon is a protected species and we have no end of evidence that the presence of Open Cage farming has had a devastating impact on the Salmon population. While not a protected species Sea Trout are also being devastated and the angling industry in Waterville has been effectively wiped out with a direct correlation to be drawn with the operations of the Deenish Farm and the poor catches and stock levels of both Salmon and Trout.

What is very interesting is that for a period of non operation when the farm was closed and between owners, that same angling industry and stock levels enjoyed a resurgence. It is at least hopeful to note that once the Open Cage Farm practice stops then recovery is possible nonetheless the capacity to recover is dependent upon a base level of stock to develop from.

It is not in the interests of good local economic development to issue a licence here when there is another industry that has had a long association with the area and has been a very positive contributor both in terms of employment and tourism development in a sustainable and low impact manner all of which we should be promoting not adversely impacting.

I am imploring you not to issue a licence to this operation until such time as they operate in a way that does not involve open cages and by so doing you will ensure good environmental protection and allow for a local industry that creates far greater revenue locally and has far better impact in terms of job creation an opportunity to recover and thrive again as it is capable of.

Is mise le meas,
Cllr Norma Moriarty
Cathaoirleach
Kenmare MD

**From:** [redacted]
**Sent:** Monday 12 February 2024 11:00
**To:** FinfishPC
**Subject:** Licence Ref No T06/202

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Dear Sirs,

Please register my objection to the renewal of the MOWI Deenish licence application, Ref No T06/202.

The previous revocation of the Licence by Minister Creed demonstrates that the applicant is not a fit or proper holder. Ever-growing evidence of pollution, disease and parasite burden and irreparable consequences to the marine environment, including native and migratory fish stocks show the need for strong enforcement by the Minister of reduced intensification of aquaculture installations.
Signed,

[redacted] [redacted]

**From:** Norma Moriarty <moriartynorma@gmail.com>
**Sent:** Monday 12 February 2024 11:03
**To:** charlie.mcconalogue@oireachtas.ie; FinfishPC
**Subject:** Renewal and Review of Licence for Deenish Island, Fish Farm Co.Kerry - T06/202

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**Renewal and Review of Licence for Deenish Island, Fish Farm Co.Kerry - T06/202**

A Chara,

I am a local representative for the Kenmare MD area and from Waterville in Co Kerry. I wish to convey both the fears and concerns of the many constituents that have made contact with me and my own concerns in respect of the above referenced Licence Application. In the first instance it is very hard to understand why an operation that has had its licence removed due to breaching its conditions can still continue said practices while an appeal to that decision is ongoing and has been so for 6 years.

The unanimous feeling of those who have made contact with me is to have open cage farms ended, especially as there is the technology and capacity to carry out Fish Farming in a way that does not negatively impact the marine life and ecosystem on which we all depend. Salmon is a protected species and we have no end of evidence that the presence of Open Cage farming has had a devastating impact on the Salmon population. While not a protected species Sea Trout are also being devastated and the angling industry in Waterville has been effectively wiped out with a direct correlation to be drawn with the operations of the Deenish Farm and the poor catches and stock levels of both Salmon and Trout.

What is very interesting is that for a period of non operation when the farm was closed and between owners, that same angling industry and stock levels enjoyed a resurgence. It is at least hopeful to note that once the Open Cage Farm practice stops then recovery is possible nonetheless the capacity to recover is dependent upon a base level of stock to develop from.

It is not in the interests of good local economic development to issue a licence here when there is another industry that has had a long association with the area and has been a very positive contributor both in terms of employment and tourism development in a sustainable and low impact manner all of which we should be promoting not adversely impacting.

I am imploring you not to issue a licence to this operation until such time as they operate in a way that does not involve open cages and by so doing you will ensure good environmental protection and allow for a local industry that creates far greater revenue locally and has far better impact in terms of job creation an opportunity to recover and thrive again as it is capable of.

Is mise le meas,
Cllr Norma Moriarty
Cathaoirleach
Kenmare MD

**From:** [redacted]
**Sent:** Monday 12 February 2024 11:03
**To:** FinfishPC
**Subject:** Submission Re MOWI RENEWAL APPLICATION FOR THEIR DEENISH ISLAND SALMON FARM SITE REF: NUMBER T06/202.

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Submission Re MOWI RENEWAL APPLICATION FOR THEIR DEENISH ISLAND SALMON FARM SITE REF: NUMBER T06/202.

Dear Minister McConalogue,

I wish to object to the renewal of the MOWI Deenish licence application on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed in 2019 for overstocking by 121%.

Minister, if you renew this licence you will be rewarding MOWI for breaking the conditions of their licence and set a dangerous precedent for future licence infringement cases.
As the Deenish salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA, the EU Habitats Directive precautionary principles should apply and the MOWI renewal application should be refused.

[redacted]

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 11:05 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Mowi deenish license application

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I am objecting to the reissue of the above license. The operators of this farm have no consideration for the surrounding environment as displayed when they failed to comply with previous regulations.

Sent from my iPhone

From: [redacted]
Sent: Monday, February 12, 2024 11:22 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: No.T06/202

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To whom it may concern.
I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 11:24 AM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: MOWI T06/202

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To whom it concerns. I want to object to the renewal of the MOWI Deenish application reference noT06/202. This license was revoked by minister for the marine Michael creed. TD in 2019. and I want it to stay revoked . MOWI should not be rewarded for breaking the conditions of their license.
Regards [redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 11:29
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** Consultation T06/202 - License for open cage salmon farm.

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Dear Minister

I am writing to you to express our deep concern for the future viability of the Lough Curran sea trout fishery as a direct result of re-licensing open cage salmon farming off Deenish Island County Kerry.

The links between coastal, cage reared salmon farming and the local collapse of migratory salmonid populations is unequivocally proven. Indeed, Inland Fisheries Ireland's own scientist has published date highlighting this issue.

The Lough Currane sea trout population is very special, genetically unique and both ecologically and economically of critical value to the local community. Given the evidence, it is baffling to think that there is even the remotest chance that the Irish Government would give this application the light of day. The Kerry migratory salmonid population brings wide ranging benefits to the Irish economy and must be protected. Damage has been done but the fishery can recover with sustainable management, and we urge the Minister to rule out any resumption of open cage salmon farming in the Deenish Island vicinity to ensure that a full recovery in the Lough Currane sea trout and salmon population is possible.

I am writing on behalf of the Wild Trout Trust, a UK registered conservation charity working across the UK and Ireland to help anyone interested in making a better world for our rivers, lakes and their wildlife, including wild trout and sea trout.

We urge you not to re-licence this damaging and unsustainable activity.

[redacted]
[redacted]
The Wild Trout Trust
[redacted]
[redacted]

WILD TROUT TRUST

Registered Charity 1162478 (England & Wales), SCO46354 (Scotland)
Registered Charitable Company No. 03345901 (England & Wales)

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**From:** [redacted]
**Sent:** Monday 12 February 2024 11:36
**To:** FinfishPC
**Subject:** Public Consultation

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Sent from my Galaxy

Submission Re MOWI RENEWAL APPLICATION FOR THEIR DEENISH ISLAND SALMON FARM SITE REF: NUMBER T06/202.

Dear Minister McConalogue,

I wish to object to the renewal of the MOWI Deenish licence application on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed in 2019 for overstocking by 121%.
Minister, if you renew this licence you will be rewarding MOWI for breaking the conditions of their licence and set a dangerous precedent for future licence infringement cases.

As the Deenish salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA, the EU Habitats Directive precautionary principles should apply and the MOWI renewal application should be refused.

These salmon cages and the lice infestation have completely dissamated the Native salmonid species including Sea Trout and Salmon along the whole west coast of Ireland.

This industry should be brought on to a land base structure as our wild Habitats can not withstand the amount of sea lice infestation attaching to Sea Trout and Salmon.

Regards.

[redacted]
[redacted]

0263
(Duplicate of 0261)

**From:** [redacted]
**Sent:** Monday 12 February 2024 11:47
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** Consultation T06/202 - Application for a licence for open cage salmon farming off Deenish island

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Dear Minister

I am writing to you to express our deep concern for the future viability of the Lough Curran sea trout fishery as a direct result of possible re-licensing of open cage salmon farming off Deenish Island County Kerry.

The links between coastal, cage reared salmon farming and the local collapse of migratory salmonid populations is unequivocally proven. Indeed, Inland Fisheries Ireland's own scientist has published date highlighting this issue.

The Lough Currane sea trout population is very special, genetically unique and both ecologically and economically of critical value to the local community. Given the evidence, it is baffling to think that there is even the remotest chance that the Irish Government would give this application the light of day. The Kerry migratory salmonid population brings wide ranging benefits to the Irish economy and must be protected. Damage has been done, but the fishery can recover with sustainable management, and we urge the Minister to rule out any resumption of open cage salmon farming in the Deenish Island vicinity to ensure that a full recovery in the Lough Currane sea trout and salmon population is possible.

I am writing on behalf of the Wild Trout Trust, a UK registered conservation charity working across the UK and Ireland to help anyone interested in making a better world for our rivers, lakes and their wildlife, including wild trout and sea trout.

We urge you not to re-licence this damaging and unsustainable activity.

[redacted]
[redacted]
The Wild Trout Trust
[redacted]
[redacted]

WILD TROUT TRUST

Registered Charity 1162478 (England & Wales), SCO46354 (Scotland)
Registered Charitable Company No. 03345901 (England & Wales)

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**From:** [redacted]
**Sent:** Monday 12 February 2024 11:55
**To:** FinfishPC
**Subject:** SUBMISSION FOR T06-202

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To: Minister for Agriculture Food & the Marine

My name is [redacted], my address is [redacted]

I would like to submit my concerns and opposition regarding the plans for T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry. [redacted] We know the Sea and we have serious concerns regarding the fish farm at Deenish Island, particularly the expansion of this facility.

I have read spoken with [redacted] who is a renowned marine biologist, working in many international projects and she helped me to digest the documents associated with the application for expansion and helped with the technical vocabulary necessary to make this submission. I stand over every single point made here below.

1. In the EIA it states that there is no negative impact on local population - the very facet that this statement was included and is so factually incorrect is astounding. Where did that information come from? It is disingenuous at best or its purposely misleading. There certainlly was not any rigorous consultation process. This facility has had an influence on the local population of anglers and tourist businesses in the Waterville region and also the surrounding villages of Portmagee, Caherdaniel , Knightstown Valentia Island, and the town of Cahersiveen since its installation especially through the sea lice infestation on the natural population of salmon and seatrout and reduced natural population meaning the once thriving lake tourism industry has flopped with a domino effect to the whole village and region regarding economy. And we are the guardians of our biodiversity in the Skellig Ocean Hope Spot- and it is also in that context that I'm writing to you too.

2. Concerns over salmon welfare and mixing with natural population
Lepeophtheirus salmonis and Caligus elongatus sea lice infestations on farms have a direct impact on salmon and sea trout through disease (secondary infection), poor swimming ability thus heightening predator interaction, premature return by seatrout to freshwater to lose lice infestation, poor feeding ability resulting in poor body condition of salmon and sea trout that survive having a knock-on effect through reduced deposition of ova.

Also Amoebic Gill Disease has reached epidemic proportions at Deenish and other sites. This can be

passed to wild salmonids and we all know escapees can be a problem which reduce genetic fitness of wild salmon.

Debris from the fish farm are periodically found on local beaches which makes one think that pens have broken up or been damaged during a storm - with increased extreme weather events this may become a bigger issue and there could be more potential for escapees.

Welfare concerns as Deenish has extremely high mortality figures approaching 46%. Climate change with increased temperature fuels invasion of jellyfish, harmful algal blooms and also accelerates sea lice production. No place for open cage farming.

Fish farm food overspill feeding native populations of fish and other marine organisms non natural sources of food in the wild

3. Concerns regarding legal obligations of the Irish government to meet EU HABITATS DIRECTIVE/ NATURE RESTORATION LAWS

Deenish island is a well known area to see seals, risso's dolphins, common dolphins, porpoise and bottlenose dolphins, of which all are protected on the EU Habitats Directive, the installation could create disturbance to these cetaceans due to noise, anchor chains and traffic to the area. We know that MOWI (locally known as Silver King Seafoods Ltd.) have been found to use pingers and other Acoustic deterrent devices (ADD's) to a detrimental level in Scotland. How can we be assured this will not happen in this marine biodiverse region? MOWI mentioned in this documentary for over use of ADD's in Scotland to deter seals,,, and not reporting properly on use of them from around minute 12:
https://youtu.be/YwRwkiQckCk?si=GJwBiysLWhKj_so5

In the EIA, looking at the images from beneath the fish farm and proximity it is clear there is a layer of sludge from the intense salmon discharge and food that may drop to the seafloor, which will turn or may have already turned the area beneath the fish farm anoxic and potentially toxic for any biodiversity that may normally inhabit this area - not in line with the Nature Restoration Law

Having an open pen salmon farm in such a rich marine biodiverse area, (SAC, NHA and more recently recognised globally for its contribution to international marine biodiversity with the Greater Skellig Coast Hope Spot designation) really goes against the Nature Restoration Law if we are already seeing detrimental effects to local fish populations and potential to impact the endangered Pearl Mussel which is found in the local salmon rivers.

An Inland Fisheries Study on fish farm proximity to salmon and seatrout rivers has shown the detrimental effects of fish farms https://www.irishexaminer.com/opinion/columnists/arid-20438374.html again this would go against the EU Habitats Directive and Nature Restoration Law if this development was allowed in an SAC

MOWI A.K.A Silver King Seafoods Ltd is currently in an EU courtcase for farmed Atlantic salmon cartel case which does not bode well or instil trust in the company operating according to EU regulations in a highly sensitive biodverse rural region
https://ec.europa.eu/commission/presscorner/detail/en/ip_24_405

Other general concerns:

Every year debris from the fish farm ends up on local beaches

Accessibility to a safe harbour will be cut off by the new layout of pens obstructing Deenish Island Bay

With the obstruction to the bay and increased fish loads this may alter the natural habitat of this bay in an SAC

With the obstruction to the bay local recreational boat users and sea fishers will not be able to access

the sheltered waters of Deenish Bay
There have been many studies reports and documentaries on how unsustainable and dangerous fish farms are, do we really want to be complicit in furthering this industry which is detrimental to our native species and marine biodiversity.
Finally, [redacted] we are often asked what the circles are near the island when stopped at the viewpoint overlooking Derrynane, Deenish, Scarriff and Atlantic ocean, we tell them it's a fish farm and most often the tourists are upset to know that we have such an unsustainable industry in our pristine corner of Ireland.

I hope that you will take these material concerns into consideration when evaluating Silver King Seafoods Ltd application to expand at Deenish Island.

Le meas

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:02
**To:** FinfishPC
**Subject:** Submission

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Dear Minister

I am writing to you to express my deep concern for the future viability of the Lough Curran sea trout fishery as a direct result of re-licensing open cage salmon farming off Deenish Island County Kerry.

The links between coastal, cage reared salmon farming and the local collapse of migratory salmonid populations is unequivocally proven. Indeed, Inland Fisheries Ireland's (IFI) own Research and Development Department has published data highlighting this issue.

The Lough Currane sea trout population is very special, genetically unique and both ecologically and economically of critical value to the local community. Rod and line fishing is valued at over €800 million (IFI disclosure) to the Irish economy. The Kerry migratory salmonid population brings wide ranging benefits to the Irish economy and must be protected.

It is tragedy that the Currane fishery has already been damaged by aquaculture practices but the fishery can recover with sustainable management, and we urge the Minister to rule out any resumption of open cage salmon farming in the Deenish Island vicinity to ensure that a full recovery in the Lough Currane sea trout and salmon population is possible.

Yours Sincerely

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:03
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** Re: Consultation T06/202 - Licence for open cage salmon farm.
**Attachments:** Paddy Gargan Salmo 2017_final.pdf

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A chara Minister,

In support of the earlier submission from my colleague, [redacted], regarding the consultation above, please find attached a piece produced by Dr Paddy Gargan of IFI for the 2017 journal of the Wild Trout Trust. This is written for the layman, but you will see that Dr Gargan cites a great deal of primary literature, all of which tells the same story: salmon farms harm wild fish and *very* likely to do so in a location like Deenish, given its proximity to L. Currane and the migration routes of wild fish leaving and entering the Lough. Inevitably, those wild fish *will* be infected by sea lice emanating from the fish farm and Currane's special sea trout population *will* be further impacted, quite possibly decimated.

It is also noteworthy that a symposium held in Cardiff in September 2023, with contributions from IFI scientists, highlighted the dire state of sea trout populations around the UK and Ireland. Much is made of the parlous status of Atlantic salmon stocks around the North Atlantic, leading to its recent IUCN re-classification of "endangered", but that Cardiff symposium unequivocally described how sea trout fare no better than their better-protected cousin. The impact of salmon farms was repeatedly highlighted by all contributors.

I very much hope the information we have provided supports you to refuse re-licensing of the Deenish Island farm.

Mise le meas,

[redacted]
[redacted] The Wild Trout Trust
[redacted]
Website: wildtrout.org

WILD TROUT TRUST

*2024 Spring Auction 15 to 24 March – register to bid HERE*
*Join Us or Renew Membership HERE*

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**From:** [redacted]
**Date:** Monday, 12 February 2024 at 11:29
**To:** FinfishPC@agriculture.gov.ie <FinfishPC@agriculture.gov.ie>
**Cc:** [redacted]
**Subject:** Consultation T06/202 - License for open cage salmon farm.

Dear Minister

I am writing to you to express our deep concern for the future viability of the Lough Curran sea trout fishery as a direct result of re-licensing open cage salmon farming off Deenish Island County Kerry.

The links between coastal, cage reared salmon farming and the local collapse of migratory salmonid populations is unequivocally proven. Indeed, Inland Fisheries Ireland's own scientist has published date highlighting this issue.

The Lough Currane sea trout population is very special, genetically unique and both ecologically and economically of critical value to the local community. Given the evidence, it is baffling to think that there is even the remotest chance that the Irish Government would give this application the light of day. The Kerry migratory salmonid population brings wide ranging benefits to the Irish economy and must be protected. Damage has been done but the fishery can recover with sustainable management, and we urge the Minister to rule out any resumption of open cage salmon farming in the Deenish Island vicinity to ensure that a full recovery in the Lough Currane sea trout and salmon population is possible.

I am writing on behalf of the Wild Trout Trust, a UK registered conservation charity working across the UK and Ireland to help anyone interested in making a better world for our rivers, lakes and their wildlife, including wild trout and sea trout.

We urge you not to re-licence this damaging and unsustainable activity.

[redacted]
[redacted]
The Wild Trout Trust
[redacted]
[redacted]

WILD TROUT TRUST

Registered Charity 1162478 (England & Wales), SCO46354 (Scotland)
Registered Charitable Company No. 03345901 (England & Wales)

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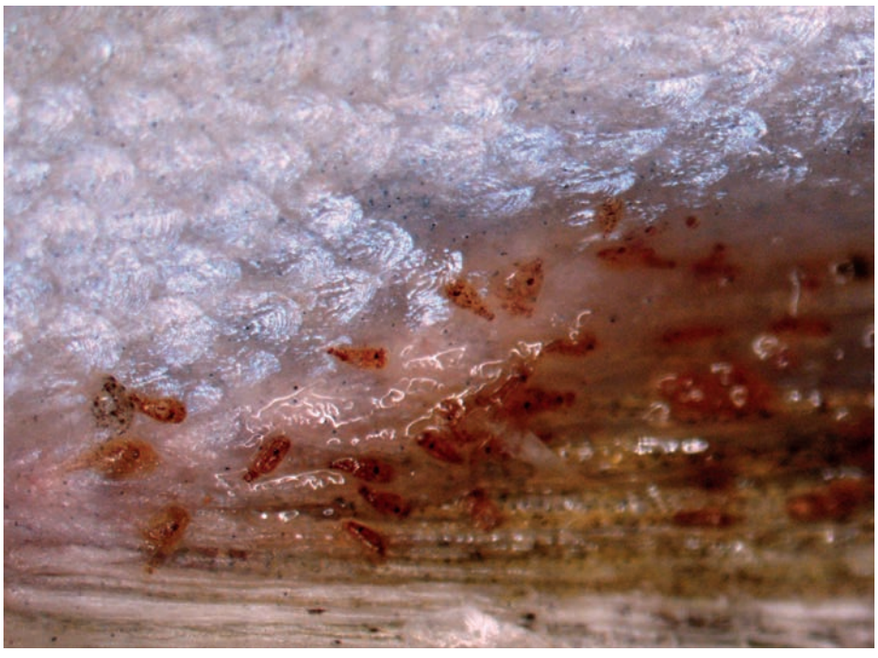
# The impact of sea lice

## A review of recent scientific evidence of the impact of sea lice from salmon farms on wild salmon and sea trout stocks.

DR PADDY GARGAN, INLAND FISHERIES IRELAND

For almost three decades, concern has been raised with regards to the potential impact of sea lice *(Lepeophtheirus salmonis)* from salmon farming on wild salmon and sea trout stocks. In the late 1980s, when salmon farming began to expand, little was known about the potential damage that lice from local salmon farms could cause to wild salmonids. Before the advent of salmon farming, wild fish — primarily spring salmon and some sea trout— returned to native rivers carrying natural levels of lice at the same time as salmon and sea trout smolts migrated to sea in spring, and these smolts encountered low levels of juvenile lice in estuaries. This natural phenomenon was altered dramatically when hundreds of thousands of farmed salmon were reared in estuaries increasing the production of sea lice larvae by orders of magnitude in springtime. Marine salmon farming has expanded significantly over the past two decades, particularly along the west coast of Norway and Scotland, and annual production has now reached 1.3 million tons and 180,000 tons respectively in both countries. The scale of salmon farming has been lower in Ireland with annual production in the range of 12,000 — 30,000 tonnes since the 1990s.

The first evidence of sea lice from marine salmon farms impacting on sea trout stocks occurred in the west of Ireland the late 1980s, when the Connemara sea trout rod catch suffered a collapse, falling from over 7,085 in 1987 to 240 in 1990. In late May 1989, sea trout were observed for the first time in the Delphi River in Connemara with heavy infestations of juvenile sea lice. These sea trout were post-smolts which had recently migrated to sea and had returned prematurely after only two or three weeks, with little or no sea growth on their scales. Similarly, lice-infested post-smolts and some sea trout kelts were recorded returning to rivers in all bays with salmon farming in western Ireland in 1990. At this time there were no regulations in place to limit lice levels on farms, and sampling of lice levels on farms did not begin until 1991. The unregulated proliferation of sea lice from salmon farms increased mortality of sea trout, and resulted in premature return of sea trout to rivers and a collapse in their stock. During the 90s, monitoring of rivers began in Scotland and Norway and similar evidence of heavily lice-infested sea trout and premature return to freshwater was apparent.



The first scientific papers documenting a clear link between lice emanating from salmon farms causing lice infestation on local sea trout stocks were from studies in the west of Ireland in the early 1990s. A large number of scientific papers have since been published on the subject and, in 2015, the Norwegian Institute for Nature Research (NINA) undertook a literature review of the effects of salmon lice on sea trout, examining over 300 scientific publications[1].

The general conclusions of this review show that salmon lice feed on the host fish's mucus, skin and muscle — causing tissue erosion — and laboratory and field studies demonstrated that salmon lice may induce osmoregulatory dysfunction, physiological stress, reduced feeding and growth, increased susceptibility to secondary infections, reduced disease resistance and mortality in individual sea trout. The review found that laboratory studies have demonstrated that infestations of 0.75 lice per gram of fish, or approximately 11 sea lice per fish, can kill a recently emigrated wild salmon smolt of about 15g if all the sea lice develop into pre-adult and adult stages.

Several studies have shown elevated salmon lice levels in wild sea trout adjacent to fish farms, particularly within 30km of the nearest farms. Amongst salmonids, sea trout are especially vulnerable to salmon lice infestation because they typically remain in coastal waters during their marine residence, and coastal waters are the areas where open-net cage Atlantic salmon farms are typically situated. Based on the reviewed studies, the NINA report concluded that salmon farming increases the abundance of lice in marine habitats and that, despite the control measures routinely applied by the salmon aquaculture industry, salmon lice in intensively farmed areas have negatively impacted wild sea trout populations by reducing growth and increasing marine mortality. However, the resulting reduction of wild sea trout populations cannot, in



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**Juvenile lice infestation on sea trout pelvic and anal fins**

most cases, be quantified because of a lack of suitably comprehensive field data and studies of population-level effects of salmon lice.

Such studies of population-level effects of lice were possible in a recent long-term study of the impact of a local salmon farm on the Erriff sea trout stock in western Ireland. After the commencement of salmon farming in the local estuary, there were significant decreases in the number and length of sea trout kelts, the estimated number of eggs deposited, the rod catch, the proportion of older fish, and the frequency of repeat spawners. There was also a significant positive relationship between the number of salmon lice on fish in the local salmon farm and the number of lice found on sea trout collected contemporaneously in local rivers. Results of this long-term monitoring programme demonstrated that significant changes in sea trout population structure can occur over a relatively short time period, and indicate that the introduction of salmon farming into the local estuary contributed to the changes in sea trout population observed.

More recently, scientists at the Institute of Marine Research in Norway initiated a risk assessment of Norwegian salmon farming where a salmon lice risk index was developed, that estimates increased sea trout mortality risk due to sea lice infestation. During the period 2010–2013, salmon lice infections — mainly resulting from salmon farming — were estimated at a total of 109 stations along the Norwegian coastline using wild sea trout as a proxy for local infection pressure on wild salmonids. Twenty-seven of these stations indicated moderate or high likelihood of mortality for wild migrating salmon smolts. For wild sea trout later in the season, 67 of the stations indicated moderate or high likelihood of mortality. This lice risk index has recently been applied to Irish and Scottish sea lice data and results reveal levels of lice infestation on sea trout that imply increased mortality risk throughout the 1990s in both countries. Lice loads on sea trout have reduced in recent years, likely reflecting improved lice control and changes in salmon farming practice. Population-level increase in risk of mortality, inferred from lice infestation rate, was estimated for individual sites.

> "The impact of sea lice from marine salmon farming on local sea trout stocks has been extensively studied but it is more difficult to assess the lice impact on salmon."

Results reveal that the likely sea trout population-regulating effect of sea lice varies among locations, with many sites recording lice levels likely to result in strong regulating effects over a prolonged period, particularly in the west of Ireland. The development of this sea lice risk index has allowed, for the first time, an estimate of the impact of salmon farming on the sea trout populations and has clearly shown that lice from farmed salmon can result in population-regulating effects on local sea trout stocks.

The impact of sea lice from marine salmon farming on local sea trout stocks has been extensively studied but it is more difficult to assess the lice impact on salmon. Whereas trout, after migrating to sea, spend long periods feeding in estuaries and coastal waters, salmon smolts migrate through estuaries more quickly to the open sea and offshore feeding grounds. This migration pattern would be expected to reduce sea lice infestation pressure on salmon smolts and result in lower impact, but is difficult to study as they do not return prematurely to freshwater to rid themselves of lice where they can be examined, as is the case with sea trout. Scientists have used hatchery salmon smolts to examine sea lice effects, by comparing survival of smolts chemically protected against sea lice infestation with un-treated control groups released in parallel. Results of these release experiments show that the potential levels of extra mortality attributable to salmon lice in farm-intensive areas is 12—44% fewer in returning adult salmon spawners. The level of increased mortality may depend on the length of estuaries/fjords, the level of lice production from local salmon farms, →



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and the exposure time of salmon smolts to lice. Studies of Atlantic salmon likely represent minimum estimates for sea trout mortality at the same sites because salmon smolts migrate quickly through coastal waters and into the open ocean, whereas sea trout remain throughout in coastal or inshore waters.

The impact of sea lice and farm escapes on wild salmon stocks was recently investigated by ICES (the International Council for the Exploration of the Sea). ICES advised that there is substantial and growing evidence that salmon aquaculture activities can affect wild Atlantic salmon through the impacts of sea lice as well as farm escapees. Both factors can reduce the productivity of wild salmon populations, and there is marked temporal and spatial variability in the magnitude of reported effects. In some studies, the impact of sea lice has also been estimated as losses of returning adult salmon to rivers. These estimates indicate marked variability, with losses in individual experiments up to 39%. ICES concluded that these 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.

A range of strategies have been implemented on salmon farms aimed at reducing lice levels in spring. These include fallowing of sites in spring, single generation sites where only one year class of salmon are present, whole bay spring fallowing, harvesting carried out remote from the grower sites, annual synchronous 'winter' lice treatment for all adjacent sites. In addition, since the early 1990s, countries have put sea lice threshold levels in place below which lice levels should be maintained on salmon farms. These thresholds are lower in springtime when wild salmon and sea trout are migrating to sea. Sanctions are also in place for breaches of lice threshold levels. Monitoring indicates that lice infestation of wild salmon and sea trout stocks does not occur at every location each year. The level of infestation and potential impact on wild salmonids depends on a wide range of factors, including the stage of production of local farms (smolts or older), lice levels on farms in spring, salinity, temperature, rainfall, wind direction, the length of estuaries/fjords, single or multiple farm sites in estuaries, local topography, etc. There is no doubt that if a combination of factors exist, even in short coastal bays, there is potential for lice from farms to impact out-migrating wild salmonids.

> "An exciting new development being undertaken in northern Norway involves rearing what are called 'super smolts', salmon smolts reared on land in re-circulation systems to a larger size before they are stocked into sea cages."

Despite recent initiatives to reduce lice levels on salmon farms in spring, monitoring indicates that sea lice from salmon farms continue to impact local wild salmon and sea trout stocks at certain locations.

One solution to this ongoing problem would be to have no sea lice impact at the most vulnerable time period in late spring, when wild salmonids migrate to sea. This would require a farm production strategy where large grower fish were harvested before wild smolt runs in spring or where these grower fish had close to zero levels of adult female sea lice. Re-location of existing farms away from important salmon and sea trout rivers is





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another possible strategy to reduce lice impact on wild stocks. An exciting new development being undertaken in northern Norway involves rearing what are called 'super smolts', salmon smolts reared on land in re-circulation systems to a larger size before they are stocked into sea cages. By stocking salmon of a larger size into sea cages, this results in a reduction in the duration of the production-cycle at sea by months, and potentially offers huge benefits in terms of sea lice impacts and greater flexibility with regard to timing of stocking sea cages and fallowing periods. It is also likely that the rearing of super smolts could be used as a stepping-stone towards full land-based production.

New developments are ongoing involving closed-containment farms at sea, and development of larger offshore sites. Land-based salmon farming is now believed to be close to being economically viable and a number of large-scale land-based farms have recently gone into production. The continued use of in-feed medical treatment for sea lice has begun to lead to resistance of lice to chemical treatment and there have been reports of treatment failures. This has led to greater use of non-medicinal lice control strategies such as 'cleaner fish' (wrasse and lumpfish) and the use of freshwater treatment for sea lice control.

Scientific work is ongoing to develop sea lice models using hydrodynamic modelling, environmental variables and sea lice production on salmon farms to support sustainable development of aquaculture and wild salmon stocks. These models simulate dispersal of larval sea lice based on farm production, hydrodynamics, water temperature and salinity, and are being used to identify the role of specific salmon farming sites as sources of sea lice. This will support assessment of the carrying capacity of the environment for aquaculture and potential for interaction with wild salmonids. This concept was implemented by the Norwegian Parliament in 2015, who introduced the concept that environmental impact should be the most important determining factor in the future growth of the salmon farming industry. The Parliament decided to use sea lice impacts on wild salmonid populations as the indicator when determining whether or not a salmon farm production area is suitable for an increase in production. A 'traffic light system' is used whereby if the indicator in a production area is green, (<10% of wild salmonids will die due to sea lice infestation) farm salmon production could be increased by 6%, if the indicator is yellow (10% — 30% of wild salmonids will die due to sea lice infestation) then production should remain unchanged; and red (if it is likely that >30% of wild salmonids will die due to sea lice infestation) the farmed salmon production level should be reduced. Monitoring will be done using a model-based system using data on juvenile sea lice emission from all salmon farms in a production area, and this will be related to the risk of unacceptable impacts on wild salmonids.



**Juvenile sea lice infestation on sea trout pelvic fin**

There is now a large body of scientific studies demonstrating that unregulated sea lice levels on salmon farms, particularly in spring when wild salmonids enter the sea, can lead to increased mortality of salmon and sea trout and impact conservation status. Despite the improvement of sea lice control and the new initiatives aimed at managing sea lice on farms, local salmon and sea trout stocks continue to be impacted at certain locations annually. Greater focus on implementing effective lice-control strategies needs to be implemented, particularly where salmonid stocks are vulnerable.

## BIBLIOGRAPHY

*1. Thorstad, E.B., et al. Effects of salmon lice Lepeophtheirus salmonis on wild sea trout Salmo trutta—a literature review. Aquacult Environ Interact Vol. 7: 91–113, 2015. www.int-res.com/articles/aei2015/7/q007p091.pdf.*

*Footnote: The publications below provide recent information on sea lice infestation of sea trout in Ireland and Scotland.*

*Shephard, S., MacIntyre, C., & Gargan, P.G. (2016) Aquaculture and environmental drivers of salmon lice Lepeophtheirus salmonis infestation and body condition in sea trout (Salmo trutta L.). Aquacult Environ Interact. Vol. 8: 597–610, doi: 10.3354/aei00201.*

*Gargan, P.G., Kelly, F.L., Shephard, S., and Whelan, K.F. (2016). Temporal variation in sea trout (Salmo trutta L.) life history traits in the Erriff river, Western Ireland. Aquacult Environ Interact. Vol. 8: 675–689, doi: 10.3354/ aei00211.*

# Action on Sea Lice

## Paul Knight of Salmon & Trout Conservation UK outlines what is being done.

**In 2016, Salmon & Trout Conservation UK made an official complaint to the EU under the Marine Strategy Framework Directive over Scottish Government's failure to regulate marine salmon farming sufficiently to protect wild salmonids. Further pressure was put on Scotland during a Special Aquaculture Session at the 2016 annual meeting of NASCO. Meanwhile, S&TC is challenging supermarkets sourcing farmed salmon from companies with poor sea lice control records – lice being a major danger to wild salmon and sea trout. The ultimate aim is for salmon farming to move to closed containment units, so creating a biological barrier between farmed and wild fish.**



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From: [redacted]
Sent: Monday, February 12, 2024 12:07 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject:

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I want to object to the renewal of the MOWI Deenish licence application Ref:No T06/202 Thank you
[redacted] Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:07
**To:** FinfishPC
**Subject:** 0268

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I request that the renewal of the license referred to above be denied due to previous non compliance with regulations contributing to the collapsed wild salmon and Seatrout stocks
Regards
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:20
**To:** FinfishPC
**Subject:** licence Ref:No. T06/202 - Objection to this licence being renewed/re-issued

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Dear Minister,

Please accept this email as an objection to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

I understand that this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed. It is reasonable to assume that such an action on the part of your predecessor was not lightly taken.

Two key issues arise from overstocking. The first is the requirement to use greater quantities of medications and pest mitigation in very high density pens - that's bad for the marine environment. The second is the fact that overstocking results in poorer quality produce which negatively impacts on the reputation of producers who are compliant with the regulations and damages their market opportunities.

The management of MOWI, through its own actions in pursuit of extra profit have shown that they have no regard for the environment, for their fellow producers or for their own stock fish. Therefore their licence should stay revoked. In short, MOWI as a previous offender, should not be given another series of opportunities to break the conditions of a new licence.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:27
**To:** FinfishPC
**Subject:** Proposed development at Deenish Island South West Kerry
**Attachments:** Salmon Farm - Deenish template letter for all (1).docx

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Please find our objection attached.

Kindly acknowledge safe receipt.

Yours etc.

From: [redacted]
Address: [redacted]
[redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed 

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:30
**To:** FinfishPC
**Subject:**

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear minister

I write this email in relation to the deenis Island fish farm. The previous minister Mr Michael Creed revoked this lincence due to the gross over stocking of the site. Mowi should not be granted any other permission to continue. The massive negative effects thats are taking place in Ballynaskelligs bay in particular lought Currane are devastating. There is a total collapse of the sea trout population which provided a huge financial reward for the village and businesses in the area. Please do the right thing and restore the status quo of this great fishery.

[redacted]
[redacted]
[redacted]
ent from Outlook for Android

From: [redacted]
Sent: Monday, February 12, 2024 12:42 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref:No. T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:41
**To:** FinfishPC
**Subject:** DEENISH (T6/202) FISH FARM EXPANSION - OBJECTION
**Attachments:** DEENISH OBJECTION.docx

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Please find attached objection to the application for an expanded licence to farm salmon at Deenish Island, REF: T6/202

Objection is from

[redacted]

I object in the strongest possible terms to the MOWI application to expand the Deenish Island fishfarm and would instead, forcibly argue that the current operation of the farm has had a hugely negative impact on the life of Waterville and the surrounding hinterland and should be closed down.

In fact, every river between Waterville and Beara reports a collapse in sea trout populations in the last few decades. The knock-on negative impact on tourist angling has been huge

As a visiting angler, committed to Waterville and with a boat on Lough Currane for 20 years, I have spent a considerable number of hours on the lake and have personal experience of the impact this MOWI facility has had on sea trout stocks.

I have also spent many hours fishing the rivers which flow into the Kenmare River over the last 25 years and have seen the same collapse. It is no coincidence that two further farms operate there.

Lough Currane, once Europe's premier sea trout lake, has been hollowed out over the last ten years to a point now where it is in serious trouble if not permanent decline. The sea trout population has collapsed in the same way Lough Maree in Scotland died and the great Western loughs in Connemara.

Climate change is relevant in the story of Lough Currane's sea trout but the pattern of destruction in those great traditional fisheries was set decades ago at exactly the time fish farms were shoehorned into fragile marine ecosystems. This pattern is now clearly visible in Ballinskelligs Bay and the Kenmare River

As can be seen by the mushrooming campaign against these farms globally, the result for local communities who rely on river systems has been catastrophic. The Connemara sea trout loughs are a plae shadow of their former glory and angling numbers have dropped off to match. In British Columbia, Chile, Tasmania, New Zealand and now Scotland, farms are being sanctioned and closed.

MOWI make much of the local employment they provide around their farms. In this case, less than a dozen which in no way offsets the extraordinary decline in visiting angler numbers and the huge local infra-structure which was once present to cater for them

[redacted] About a half dozen remain and of them, just 3 could be described as regulars. This is repeated in berths around the lake. His lakeside guesthouse was an iconic presence for generations of anglers and the appearance of For Sale signs on it before the pandemic hit was a sad reflection of the fishery's decline.

Full-time ghillies now number a half dozen and it is even a stretch to describe them as full-time. Local guide [redacted] spoke recently about a time when "50/60" ghillies worked the lake.

This means that the ancillary requirements for food and lodging no longer exist. Angling filled in many gaps in winter and early spring when tourist towns without access to premium fishing were ghost towns.

This aspect alone made wonder about the "AQUAFACT" environmental impact assessment, presumably paid for by MOWI, which, remarkably, mentions sea trout just once and concludes that an expanded fish farm will have no negative impact on the area.

The section titled 'Fisheries' has no mention of sea trout whatsoever.

"Cod, mackerel, horse mackerel, whiting and white belly anglerfish/ monkfish use the waters near Deenish Island as either nursery or spawning grounds with all overlapping the proposed aquaculture renewal site except for herring which occurs further outside of the bay.

The area is also within the range of adult herring, megrim, hake, whiting, haddock, monkfish, Atlantic cod, Blue Whiting and Atlantic salmon. Given the nature of salmon aquaculture and the relatively small spatial overlap of the proposed site with nursery or spawning grounds potential significant effects will not occur."

Truly remarkable. Every fish in the ocean, except sea trout.

The report conclusion is that we should all relax. There will be no "significant" threat to the environment

This is an interesting conclusion, given that Deenish failed its last benthic test.

The report makes the claim that there will be no impact on the environment around, under or at distance from the cages and yet it also says "The fallowing of the site at the end of harvest will see no smolts

present at the site which will allow time for the marine environment to recover”

If there is “no significant impact”, what is the marine environment “recovering” from?

In Scotland, mortality rates in cages ran at 40% last year and this has become a serious animal welfare issue, widely covered in the media.

Irish morality rates are as bad and sometimes worse than Scotland.

In 2015, the Deenish farm had morality of 45.8%, 393,417 died from 828,286 put in the cages.

This is not an isolated case. 2013: 36.4% 2019 28.9%.

Imagine if these numbers were replicated in land based farming operations. Put simply, it would not be acceptable and would not licensed.

It is an industry dominated by a powerful entity, MOWI, which has used legal systems across the planet to impose their will on fragile ecosystems which have been ruined as a result. MOWI is facing opposition now everywhere they have operations.

Their response to the disgraceful overstocking of Deenish was to argue semantics, delay/obfuscate and fill their cages with smolt. They now add insult to injury by applying for a massive expansion in capacity at the site.

The population of sea trout in Lough Currane has declined dramatically and personal experience of lice covered smolt, returned to the lake just days or weeks after leaving, tells me where the blame lies.

Any smolt that make it beyond the cloud of lice in Ballinskelligs Bay must then contend with the ravaging of bait fish by inshore trawling, a catch which is then used to feed farmed salmon.

The irony is breath-taking.

Allow this expansion and it will kill Lough Currane and a century old angling tradition and economy with it.

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 12:43 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject:

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I want to object to the renewal of the MOWI Deenish licence application ref T06/202 as this licence was revoked for overstocking by MOWI in 2019 by former Minister For the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence

signed

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:48
**To:** FinfishPC
**Subject:** Renewal of MOWI Deenish licence Ref No. TO6/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sirs,

I wish to object to the renewal of the above Licence. As this Licence was revoked for overstocking by MOWI in 2019 by the former Minister for the Marine, Michael Creed. It should remain revoked.

MOWI should not be rewarded for breaking the conditions of their licence. I also object to its visual imposition to a very beautiful area and as such is an eyesore and does nothing to the attractiveness

of the area for tourism. [redacted] I had the very unpleasant experience of being covered

by sea lice all over my body whilst swimming in the area a few years ago. I believe the fish farm was the only obvious reason for this infestation in the area at that time.

Thus for all the above reasons and well known damage to fishing interests in the area I object strongly to the renewal of the above Licence.

Regards,

[redacted]

[redacted]

**From:** [redacted]

**Sent:** Monday 12 February 2024 12:58
**To:** FinfishPC
**Subject:** Public Consultation
**Attachments:** Ballindiff headed paper.docx

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To whom it may concern.

Please see attached our subbmission on behalf of the Ballindiff Angling Club.

Regards.

[redacted]

[redacted]

Ballindiff Angling Club.




0276

Submission Re MOWI RENEWAL APPLICATION FOR THEIR DEENISH ISLAND SALMON FARM SITE REF: NUMBER T06/202.

Dear Minister McConalogue,

Our club Ballindiff Bay Anglers wish to object to the renewal of the MOWI Deenish licence application on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed in 2019 for overstocking by 121%.

Minister, if you renew this licence you will be rewarding MOWI for breaking the conditions of their licence and set a dangerous precedent for future licence infringement cases.

As the Deenish salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA, the EU Habitats Directive precautionary principles should apply and the MOWI renewal application should be refused.

Our club and its membership are totally against salmon cages on our costs. A lot of these Salmon cages are in (SACs) .The infestation of Sea lice on wild Native Salmon and Sea Trout are having an adverse effect on the ecology of our Native wild Salmonid species..

Regards

[redacted]

[redacted]

Ballindiff Angling Club

Ballindiff Bay Angling Club, [redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 13:09
**To:** FinfishPC
**Subject:** Consultation T06/202 - License for open cage salmon farm

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister

I am writing to express my deep concern for the impacts on local marine and freshwater ecosystems as a direct result of re-licensing open cage salmon farming off Deenish Island County Kerry. Cage rearing of salmon directly pollutes the marine environment and relies on unsustainable industrial fishing to provide fish meal and oil for the fishes diet. Vast quantities of toxic compounds are tipped into the sea to try and control sea lice infestations in the farmed stock. Sea lice populations in local waters rocket, infecting the wild fish. The links between coastal, cage reared salmon farming and the local collapse of migratory salmonid populations is unequivocally proven. Indeed, Inland Fisheries Ireland's own scientist has published data highlighting this issue.

The Lough Currane sea trout population is very special, genetically unique (containing *ferox* genes) and both ecologically and economically of critical value to the local community. This subspecies of trout should be protected in its own right. Given the evidence, it is baffling to think that there is even the remotest chance that the Irish Government would give this application the light of day. The Kerry migratory salmonid population brings wide ranging benefits to the Irish economy and must be protected. Damage has been done but the fishery can recover with sustainable management, and we urge the Minister to rule out any resumption of open cage salmon farming in the Deenish Island vicinity to ensure that a full recovery in the Lough Currane sea trout and salmon population is possible.

The Currane system and Kerry Blackwater are home to populations of otter and freshwater pearl mussels, both being protected as individual species and existing within a local network of sites covered by SACs. The pearl mussel is 'critically endangered' and it is an offence to disturb it or damage its habitat. The mussels rely on juvenile salmon and sea trout to spawn succesfully as they are an intermediate host for the species. Anything that reduces the numbers of salmon and sea trout (such as this proposal) in the rivers will directly damage mussel populations, so is illegal within the Habitats Directive.

I urge you not to re-licence this damaging and unsustainable activity.

[redacted]

Virus-free.www.avast.com

**From:** [redacted]
**Sent:** Monday 12 February 2024 13:10
**To:** FinfishPC
**Subject:** Licence Ref: No. T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

12/02/2024
Mr Charlie McConalogue
Minister For Agriculture, Food and Marine
Dail Eireann
Leinster House
Kildare Street
Dublin 2

Dear Minister McConalogue

I want to object to the renewal of the MOWI Deenish Licence Application Ref:T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 13:18
**To:** FinfishPC
**Subject:** Licence ref no T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I want to object to the renewal of the MOWI Deenish licence application Ref no T06/202 as this licence was revoked for over stocking by MOWI in 2019 by former Minister for the marine Michael Creed, it must stay revoked MOWI must not be awarded a licence after already breaching the conditions of there licence.

[redacted]

Sent from my Galaxy Tab A
Get Outlook for Android

**From:** [redacted]
**Sent:** Monday 12 February 2024 13:19
**To:** FinfishPC
**Subject:** Salmon Farm License T06/202 - Renewal Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir, Madame,

I would like to state my objection to the renewal of the MOWI Deenish salmon farm license application Ref. T06/202 on environmental and animal welfare grounds.

kind regards,

[redacted]

Recewed 9/2/24

[redacted]

To Minister for Agriculture,
food and Marine.
Ref: T06/202

Dear Minister,

I wish to object to the Aquaculture Licence and foreshore licence for Salmon farm at Deenish Island, Co. Kerry
The Deenish Island Salmon farm established in the 1990s has had a severe and detrimental effect on nearby wild salmon and sea trout due to sea lice and other related diseases.
During the period 2004 – 2009 when there were no salmon on Deenish farm there was a marked improvement in the Waterville sea trout fishery. When production recommenced around 2010 there was an immediate and drastic deterioration in local sea trout angling
A wide range of international research points to the dire problems associated with such salmon farms.
Even from an animal welfare point of view major questions should be asked where there are up to 40% mortality rates.
One has only to look at the problems up the west and north west coasts of both Ireland and Scotland
I see that salmon farming in it's present state is neither viable, sustainable or wanted.

Minister, I ask you to decline this licence application.

Sincerely,

[redacted]

Received 9/2/24



From: [redacted]
Address: [redacted]

Date: 07/02/2024

To: Minister for Agriculture, Food and the Marine

**Reference T06/202Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,

I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

Received 9/2/24



From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

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The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted] 07-02-2024.

1 Received 12/2/24.

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork, P85TX47.

07 February 2024

**Objection to the Proposal T06/202, by Silver King Seafood, Mowi Ireland, Kindrum, Fanad, Letterkenny. Co Donegal for a Salmon Farm at Deenish Island, between Ballinskelligs Bay and Kenmare, Co. Kerry. (Called Deenish Island here for brevity)**

**Introduction;**

A proposal for a salmon farm at **Deenish Island, between Ballinskelligs Bay and Kenmare Bay, Co. Kerry,** is currently under consideration.
The Irish government and statuary bodies have a history of not safeguarding our environment. This has been highlighted by the numerous times that environmental protective action has been taken by the Irish Government, only under the threat of fines and possible court action by the EU.
We are now at risk of this happening again.
I object to this application, and request that a salmon farm T06/202 at Deenish Island is not allowed for the following reasons:

- **Wild salmon at risk**
- **River Angling at risk**
- **Water quality at risk**
- **Wildlife at risk**
- **Shellfisheries at risk**
- **Tourism at risk**

Only in this way can the marine environment, protected species, local fishing and tourism jobs, be safeguarded.
Further concerns arise regarding the legislative framework for salmon farming licences in Ireland. A direct conflict of interest arises, as the same Minister that has set the salmon farming policy agenda has almost total control over all stages of aquaculture licence procedure, from approval to monitoring and policing.

**Wild salmon at risk**

The International Union for Conservation of Natures Red List of Threatened Species (IUCN) has moved The **Atlantic salmon** (*Salmo salar*) from Least Concern **to Near Threatened**, with new evidence showing the global population decreased by 23% between 2006 and 2020[1].Atlantic salmon are now restricted to a small portion of the rivers they inhabited a century ago across northern Europe and North America, due to multiple threats over the course of their long-distance migrations between freshwater and marine habitats.

[1] https://www.iucn.org/press-release/202312/freshwater-fish-highlight-escalating-climate-impacts-species-iucn-red-

***Threat from sea lice***

In the wild, salmon are perfectly adapted to cope with sea lice concentrations found in natural open ocean environments. However, in salmon farms sea lice build up to such an extent that the fish have to be treated with pesticides to stop them suffering such severe damage that they develop infections and die. In the west of Ireland, where salmon farms are near ubiquitous, young wild salmon (smolts) must migrate unprotected through dense clouds of sea lice and sea lice larvae. It is universally accepted that these lice are having a negative impact on wild salmon and sea trout populations.

Various scientific studies have examined the scale of this impact. What is clear is the sea lice emanating from salmon farms are significantly increasing mortality rates in juvenile salmon migrating out to sea. The young salmon, called smolts, are most vulnerable because of their size. Indeed, it only takes a couple of sea lice significantly impacting their potential survival. In turn, the numbers of adult salmon returning to spawn has dropped so drastically they're increasingly limited in their ability to sustain future generations.

This research highlights the need to separate salmon farms from wild salmon rivers to ensure wild salmon populations are not at risk of collapsing. It is for these reasons, that in 1994 a Report commissioned by the Minister of the Marine from the Sea Trout Working Group stated that until the precise nature of the relationship between sea lice and sea trout is understood '*a precautionary approach dictates that it would be prudent to avoid siting new fish farms or increased salmon farm production…within 20km of a sea trout river mouth*'.

Today, the situation is far from resolved. Salmon farms continue to be located much too close to wild salmon rivers with the result that local salmon and sea trout populations have been devastated.

While some progress has been made in the control of sea lice on some farms, these are often thwarted. Increasing disease incidence has affected fish appetite resulting in decreased ingestion of in-feed medication to control sea lice. Furthermore, increased resistance to treatment and warming seas are also favouring lice breeding.

***Threat from escapes***

A further threat to wild salmon comes from escaped farmed salmon. For a long time, it has been known '*escapees can have detrimental genetic and ecological effects on*

*populations of wild salmon. The present level of escapees is regarded as a problem for the future sustainability of sea-cage aquaculture'.*[2]

They spread disease and parasites, compete for food, and over-run redds.[3]

A further problem lies with inbreeding and genetic dilution. In the wild, salmon are loyal to a particular river, returning each year to spawn. Each river's salmon population has adapted over thousands of years to be perfectly in tune with that very environment. If escaped farmed salmon cross breed with wild populations they pose a significant threat to their gene pool. Farmed fish are designed to be aggressive feeders that grow fast. But, they're not used to dealing with predators, and don't have carefully attuned strategies for growth, maturity, timing of migration and resisting disease that relate to their local river.

Research shows escaped farmed salmon are just as fertile as their wild cousins, and identifies *'a clear threat of farm salmon reproduction with wild fish'.*[4]

The result of such inbreeding is reduced homing precision, survival, life span, and productivity of wild salmon populations.[5]

A further, and ironic impact of salmon farm escapes is they may inflate catch based spawning stock estimates to such an extent, that the stock appears either to be healthy or recovering, the consequences of which are that conservation measures are either relaxed or not strengthened, or new measures not being introduced.[6]

Such a situation has already been seen in Ireland with the collapse of sea trout in Connemara during the 1980s when salmon farming was introduced. [7]

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[2] Letter from Mark Costello to Minister Coveney, 10 May 2013 http://bantryblog.wordpress.com/2013/05/13/fie-press-release-13-may-2013-world-expert-warns-minster-on-sea-lice-cites-recent-incorrect-information-in-the-media/.

[3] Letter from Mark Costello to Minister Coveney, 10 May 2013 http://bantryblog.wordpress.com/2013/05/13/fie-press-release-13-may-2013-world-expert-warns-minster-on-sea-lice-cites-recent-incorrect-information-in-the-media/.

[4] Association of Salmon Fishery Boards, Statement on Sea Lice, 3 Feb 2013, http://www.asfb.org.uk/asfb-statement-on-sea-lice/

[5] M Krkosek, C W Revie, B Finstad and CD Todd; (2013) Comment on Jackson *et al.* 'Impact of *Lepeophtheirus salmonis* infestations on migrating Altantic salmon, *Salmo salar* L., at eight locations in Ireland with an analysis of lice-induced marine mortality', Published in Journal of Fish Disease, doi: 10.1111/jfd.12157.

[6] Jensen, Ø., et al. "Escapes of fishes from Norwegian sea-cage aquaculture: causes, consequences and prevention." Aquaculture Environment Interactions 1.1 (2010): 71-83.

[7] Krkosek. M et al. Impact of parasites on salmon recruitment in the Northeast Atlantic Ocean, Proc R Soc B Journal, 2012, http://rspb.royalsocietypublishing.org/content/early/2012/11/01/rspb.2012.2359

**Tourism at risk**

The Kerry and Cork coastlines are becoming more and more popular for tourists looking for a peaceful and unspoilt refuge. The locating of toxic salmon farms are certainly not welcome in such scenic and naturally pristine areas.

Yours sincerely



Received 12/2/2024



From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

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7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Sign [redacted] 07/02/2024

Received 12/2/24.

Minister for Agriculture, Food and the Marine,
Aquaculture and Foreshore Management Division
National Seafood Centre,
Clogheen,
Clonakilty,
Co. Cork,
P85 TX47

[redacted]

7th February 2024

T06-202 Silver King Sea Foods Ltd
Aquaculture Licence and Foreshore Licence Application East Deenish Island, Co Kerry

Dear Sir,

I hereby make a submission on the Appropriate Assessment and against both the Aquaculture Licence and the Foreshore Licence Applications as stated above by Silver King Sea Foods Ltd.

## 1.0 Personal Background

I am a retired Chartered Civil Engineer and Fellow of the Institute of Engineers Ireland with extensive experience in water quality and water treatment.
I also have been fortunate enough to have fished Lough Currane Co Kerry, on a regular basis throughout every year from January to October since 1989 to date, some 34 years.

## 2.0 Legal Status

In 2019, the then Minister for Agriculture, Food and the Marine Minister Creed discontinued the existing Aquaculture Licence operated by MOWI IRELAND, the owners of Silver King Sea Foods Ltd for a flagrant breach of the Licence conditions. ***MOWI Ireland were found to have over harvested the Fish farm by 120% in excess of the Licence Limit, a total disregard for the Licence Conditions. Clearly MOWI cannot be trusted to comply with Licence conditions or protect the Environment.***
Predictably MOWI IRELAND lodged an appeal against the discontinuation of their Licence, and meantime continued operating the Fish Farm to date.
To date the Hearing of this Appeal has not been completed despite the elapse of four years, with no explanation.
The current application is for the '***Renewal of the Aquaculture Licence'*** however until the Appeal Hearing is concluded and the discontinuation of the Licence in 2019 is either overturned or upheld, then at present ***no valid Licence exists and hence cannot be renewed.***
In my opinion any renewal of a Licence would be an act of 'Ultra Vires'.

### 3.0 Experience of Wild Sea Trout and Atlantic Salmon in Lough Currane

Historically Lough Currane was recognised as a world class fishery both for the number and quality of sea trout and Atlantic salmon. It was quite unique certainly within Europe and consistently produced very healthy specimen fish.
This all started to change in 1992, only two years after the fish farm at Deenish opened in 1990, when high levels of sea lice were found on sea trout within Lough Currane and the river tributaries.
There was a continuous decline in numbers and quality of wild fish in the system in particular the sea trout until 2006 when numbers and quality of sea trout started to improve.
It can be no coincidence that the fish farm at Deenish stopped production in 2004.
Large numbers of spawning fish with all age groups represented were witnessed in the period when the fish farm was closed, in particular between 2009 and 2010.
After MOWI purchased the Fish Farm in 2008 and started stocking again in the spring of 2010, the condition and number of sea trout in the system began to decline rapidly in 2011, and continued to decline with virtually no spawning stock present in the system.
Since 2011 the limited numbers of sea trout I have caught and released in the Lough have all, without exception, been covered in sea lice. On a regular basis the sea trout were undersized for the time of year and had obviously

been out to sea earlier in the year to feed, but returned to the safety of the fresh water lough covered in lice from the period spent in the sea. The premature return to the Lough of smolts and kelts means they could not feed and grow in the normal cycle of the life of a sea trout. They only returned from the sea due to excessive number of sea lice present in the sea, and then present on the sea trout in the lough.

The sad truth is that the once famous Lough Currane fishery has now become virtually barren of wild sea trout and a significant decline in numbers of salmon.
The Lough, River System and Ballyskelligs Bay are all part of the Special Area of Conservation for Atlantic Salmon (SAC) 002158 under the Killarney National Park, Macgillycuddy's Reeks and Carragh River Catchment SAC as such should be a protected environment. Instead of protecting the environment, by granting any Licence to continue a fish farm at Deenish would see the total loss of wild sea trout and significantly impact the Atlantic Salmon in the area. A completely irresponsible action with no respect for the state of nature.

## 4.0 Scientific Evidence of Fish Farm Sea Lice on Wild Sea Trout and Atlantic Salmon.

It has been well established by scientific research in Ireland, UK and Norway that Fish Farms generate harmful levels of sea lice infestation, namely Lepeophtheirus salmonis and Caligus Elongates which subsequently have a direct impact on salmon and sea trout through disease.
Previous studies in Ireland (fully and Whelan, 1993), Scotland (Butler 2002) and Norway (Heuch and Mo, 2001) have indicated that in spring, the majority of nouplii sea lice arise from ovigerous lice infesting farmed salmon. Tully et a/. (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 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 & Gorgon (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.

***In the Aquaculture Licence Application it is stated the existing Fish farm and proposed extension Fish Farm does not have any significant effect on the Biodiversity in the area. This is clearly not correct.***

## 5.0 Tourism and Economy.

The nearby village of Waterville relies substantially on the income from tourism. Traditionally a substantial part of this income was generated from visiting anglers from all over the world for extensive periods.
These visitors spent substantial amounts in Hotels, Bed and Breakfast, Restaurants, Public Houses and General Shops. Since the drastic decline of the Salmon and particularly the Sea Trout the visiting numbers of anglers have also drastically declined. The effects have seen closure of Hotels, Bars, Shops and Restaurants with the loss of many jobs and subsequent drastic impact of loss of income to families.

Similarly in the last 12 to 15 years there has been a decline from approximately 12 gillies employed on Lough Currane and the Rivers, to the present 5 part time gillies. On any particular day of the fishing season there is rarely more than 4 to 6 boats on the Lough, compared to 15 to 20 ten years ago.
The wild stock of Salmon and Sea trout could recover if Fish Farming stops in this area, with the subsequent recovery in a valuable sustainable tourist industry in this area.

In contrast the current Fish Farm only employs 3 people, and the proposed extended Fish Farm will employ only 7 staff.

***The numbers simply don't make any sense, and the statement in the Aquaculture Licence Application that the existing and proposed Fish farm have no significant effect on tourism and recreational activities is blatantly not true.***

## Conclusion

It would be wholly irresponsible to grant an Aquaculture Licence and Foreshore Licence for the Applicant at Deenish Island Area Co Kerry, or any similar proximity to the Lough Currane System and SAC for the reasons submitted.

Yours Faithfully

[redacted]

From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division, National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

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4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted] 01-02-2024

Received 12/2/

Minister for Agriculture, Food and the Marine,
Aquaculture and Foreshore Management Division
National Seafood Centre,
Clogheen,
Clonakilty,
Co. Cork,
P85 TX47

[redacted]

8th February 2024

T06-202 Silver King Sea Foods Ltd
Aquaculture Licence and Foreshore Licence Application East Deenish Island, Co Kerry

Dear Sir,

I hereby make a submission on the Appropriate Assessment and against both the Aquaculture Licence and the Foreshore Licence Applications as stated above by Silver King Sea Foods Ltd.

## 1.0 Personal Background

I have fished Lough Currane, associated smaller loughs and rivers on the same system since 1987.
I have also been a Gillie on Lough Currane Co Kerry since 1991 to date, some 37 years. The reduction in working gillies on Lough Currane over the last 12years approximately has been drastic. This is due to the steady reduction in visiting anglers to Waterville, all as a consequence of the collapse in sea trout stock and reduction of Atlantic Salmon.

## 2.0 Legal Status

In 2019, the then Minister for Agriculture, Food and the Marine Minister Creed discontinued the existing Aquaculture Licence operated by MOWI IRELAND, the owners of Silver King Sea Foods Ltd for a flagrant breach of the Licence conditions. ***MOWI Ireland were found to have over harvested the Fish farm by 120% in excess of the Licence Limit, a total disregard for the Licence Conditions. Clearly MOWI cannot be trusted to comply with Licence conditions or protect the Environment.***
Predictably MOWI IRELAND lodged an appeal against the discontinuation of their Licence, and meantime continued operating the Fish Farm to date.
To date the Hearing of this Appeal has not been completed despite the elapse of four years, with no explanation.
The current application is for the '***Renewal of the Aquaculture Licence'*** however until the Appeal Hearing is concluded and the discontinuation of the Licence in 2019 is either overturned or upheld, then at present ***no valid Licence exists and hence cannot be renewed.***
In my opinion any renewal of a Licence would be an act of 'Ultra Vires'.

### 3.0 Experience of Wild Sea Trout and Atlantic Salmon in Lough Currane

Historically Lough Currane was recognised as a world class fishery both for the number and quality of sea trout and Atlantic salmon. It was quite unique certainly within Europe and consistently produced very healthy specimen fish.
This all started to change in 1992, only two years after the fish farm at Deenish opened in 1990, when high levels of sea lice were found on sea trout within Lough Currane and the river tributaries.
There was a continuous decline in numbers and quality of wild fish in the system in particular the sea trout until 2006 when numbers and quality of sea trout started to improve.
It can be no coincidence that the fish farm at Deenish stopped production in 2004.
Large numbers of spawning fish with all age groups represented were witnessed in the period when the fish farm was closed, in particular between 2009 and 2010.
After MOWI purchased the Fish Farm in 2008 and started stocking again in the spring of 2010, the condition and number of sea trout in the system began to decline rapidly in 2011, and continued to decline with virtually no spawning stock present in the system.
Since 2011 the limited numbers of sea trout I have caught and released in the Lough have all, without exception, been covered in sea lice. On a regular basis the sea trout were undersized for the time of year and had obviously been out to sea earlier in the year to feed, but returned to the safety of the fresh water lough covered in lice from the period spent in the sea. The premature return to the Lough of smolts and kelts means they could not feed and

grow in the normal cycle of the life of a sea trout. They only returned from the sea due to excessive number of sea lice present in the sea, and then present on the sea trout in the lough.

The sad truth is that the once famous Lough Currane fishery has now become virtually barren of wild sea trout and a significant decline in numbers of salmon.
The Lough, River System and Ballyskelligs Bay are all part of the Special Area of Conservation for Atlantic Salmon (SAC) 002158 under the Killarney National Park, Macgillycuddy's Reeks and Carragh River Catchment SAC as such should be a protected environment. Instead of protecting the environment, by granting any Licence to continue a fish farm at Deenish would see the total loss of wild sea trout and significantly impact the Atlantic Salmon in the area. A completely irresponsible action with no respect for the state of nature.

## 4.0 Scientific Evidence of Fish Farm Sea Lice on Wild Sea Trout and Atlantic Salmon.

It has been well established by scientific research in Ireland, UK and Norway that Fish Farms generate harmful levels of sea lice infestation, namely Lepeophtheirus salmonis and Caligus Elongates which subsequently have a direct impact on salmon and sea trout through disease.
Previous studies in Ireland (fully and Whelan, 1993), Scotland (Butler 2002) and Norway (Heuch and Mo, 2001) have indicated that in spring, the majority of nouplii sea lice arise from ovigerous lice infesting farmed salmon. Tully et a/. (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 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 & Gorgon (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.

***In the Aquaculture Licence Application it is stated the existing Fish farm and proposed extension Fish Farm does not have any significant effect on the Biodiversity in the area. This is clearly not correct.***

## 5.0 Tourism and Economy.

The nearby village of Waterville relies substantially on the income from tourism. Traditionally a substantial part of this income was generated from visiting anglers from all over the world for extensive periods.
These visitors spent substantial amounts in Hotels, Bed and Breakfast, Restaurants, Public Houses and General Shops. Since the drastic decline of the Salmon and particularly the Sea Trout the visiting numbers of anglers have also drastically declined. The effects have seen closure of Hotels, Bars, Shops and Restaurants with the loss of many jobs and subsequent drastic impact of loss of income to families.

Similarly in the last 12 to 15 years there has been a decline from approximately 12 gillies employed on Lough Currane and the Rivers, to the present 5 part time gillies. On any particular day of the fishing season there is rarely more than 4 to 6 boats on the Lough, compared to 15 to 20 ten years ago.
The wild stock of Salmon and Sea trout could recover if Fish Farming stops in this area, with the subsequent recovery in a valuable sustainable tourist industry in this area.

In contrast the current Fish Farm only employs 3 people, and the proposed extended Fish Farm will employ only 7 staff.

***The numbers simply don't make any sense, and the statement in the Aquaculture Licence Application that the existing and proposed Fish farm have no significant effect on tourism and recreational activities is blatantly not true.***

## Conclusion

It would be wholly irresponsible to grant an Aquaculture Licence and Foreshore Licence for the Applicant at Deenish Island Area Co Kerry, or any similar proximity to the Lough Currane System and SAC for the reasons submitted.

Yours Faithfully,



From: [redacted]
Sent: Monday, February 12, 2024 1:33 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Fish farm

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Sent from my iPhone I Object to it [redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:44
**To:** FinfishPC
**Subject:** T06/202

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I want to object to the renewal of the MOWI Deenish licence application ref. No T06/202 as this license was revoked for their over stocking by MOWI in 2019 by former minister for marine, Michael Creed it should stay revoked.
Signed [redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:00
**To:** FinfishPC
**Subject:** Salmon farm application

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SUBMISSION FROM CORBALLY ANGLERS RE RENEWAL OF MOWI MARINE FINFISH AQUACULTURE LICENSE AT DEENISH ISLAND CO KERRY… License site ref. T06/202.
Dead Minister Mc Conalogue ,
We at Corbally Anglers are asking you to reject the MOWI renewal application for their Deenish Island Salmon Farm site … REF .. T06/202 as this license was revoked by the former Minister Michael Creed in April 2019 for overstocking by an alarming 121 per cent, which is totally unacceptable and showing a total disregard for the licensing conditions.
We are sure you are aware of the raft of lethal diseases associated with salmon farms and the enormous amount of salmon farms fatalities each year which proves beyond the shadow a of doubt that they are unsustainable , they are also having a serious negative impacts on our unique marine ecosystems along our wild Atlantic way.
Most importantly we would like to add that salmon farms are having a serious negative impact on our genuine Wild Atlantic Salmon and Seatrout populations both here in Ireland and abroad and which have been here since the ice age.
We would also like to point out that our Wild Atlantic Salmon is now classified as an endangered species and protected under the EU Habitats Directive.. anex 1 and 2 and deserving a a favourable conservation approach.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:15
**To:** FinfishPC

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I want to object to the renewal of the MOWI Deenish license application ref no. T06/202
AS THIS LICENSE was revoked for overstocked by MOWI in 2019.
Signed [redacted]
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:18
**To:** FinfishPC
**Subject:** Ref:No. T06/202

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With reference to the above,

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

These practices are causing serious harm to out natural environment and has massive implications for bio diversity and sustainability.

Fish farming is being stopped around the world for its effects, WHY are we here in Ireland allowing it?

Short term gain, long time effects.

Please do not renew this licence

Signed, [redacted]

Name and address:
[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 2:31 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref.No.T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref.No.T06/202 as this licence was revoked by the former minister for the marine Michael Creed,it should stay revoked .Mowi should not be rewarded for breaking the conditions of their licence.
Signed
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:30
**To:** FinfishPC
**Subject:** Attn Mr Charlie McConalogue Minister for Agriculture Food and the Marine
**Attachments:** MOWI licence submission 12th February 2024.docx

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**Silver King Seafoods Ltd., Mowi Ireland, Kindrum, Fanad, Letterkenny, Co. Donegal, T06 - 202. Foreshore Licence Application, Deenigh Island Co Kerry.Dear**

Dear Minister,
I refer to the above licence application and I attach a submission from the National Anglers Representative Association (NARA.)
Kind Regards
[redacted]
NARA
[redacted]

[redacted]

12th February 2024

Ref

**Silver King Seafoods Ltd., Mowi Ireland, Kindrum, Fanad, Letterkenny, Co. Donegal, T06 -202. Foreshore Licence Application, Deenigh Island Co Kerry.Dear**

The National Anglers Representative Association (Nara) is a representative body for Game Angling Clubs in Ireland. We have over 10,000 members and are, inter alia, committed to ensuring that habitat and ecosystems are maintained in order to preserve our marine and freshwater habitats for wild sea trout and salmon.

NARA are concerned at the application by MOWLI Ireland to the Minister for Agriculture, Food and the Marine to review and renew an Aquaculture Licence for the production of finfish (farmed salmon) in Ballinskelligs Bay Co Kerry.

Nara would like to make the following submission on the application.

The original licence for this site was revoked by Minister Creed in 2019 on the basis that MOWI had overstocked their intensive farm by 121%. MOWI have taken legal action challenging the Ministers right to revoke the licence. This matter has been referred to ALAB. Therefore in the opinion of NARA no licence currently exists. The Minister should not have begun a public consultation on a licence that does not exist and cannot review and renew a licence that does not exist.

The Atlantic Salmon is a protected species under European Legislation. Wild Salmon are on the brink of extinction in Ireland and sea trout numbers have declined massively since the advent of open cage salmon farming. Numbers returning to spawn have deteriorated drastically over the past twenty years. There is significant scientific research pointing to the negative impact that salmon farming has had on the populations of wild salmon and sea trout. These negative impacts arise from increased levels of sea lice which affect salmon smolts

returning to the sea. There are also issues with the significant risk from escaping farmed salmon interfering with the genetic integrity of wild salmon.
Fish meal and fish oil from anchovies, sardines, mackerel, herring, and other small forage fish, including sand eel, comprise 25 to 30 percent of most salmon feed. These fish are being fished to near extinction to be used as animal feed. The impact of this not only affects wild salmon but also other fish species and also has a major impact on bird life. There is no mention of this in the environmental assessment carried out on behalf of the applicant.

The salmon farming industry claim that salmon farming is beneficial to the environment and is a solution to overfishing. This is not so. The production of salmon in open sea cages generates massive amounts of waste which drops to the ocean floor. This has a serious negative impact on the local environment and is known to cause eutrophication and serious algal blooms. The industry also use cocktails of chemicals, including antibiotics, to control sea lice and other diseases which are rampant in the intensive cages used for production.

Recent court cases in the USA have challenged the salmon farming industry's sustainability claims. Norway's Mowi ASA, the world's largest salmon, settled a deceptive advertising case in federal court in New York City, USA. The company paid $1.3 million and agreed its U.S. subsidiaries would stop using the phrases "sustainably sourced" and "naturally raised" to describe its smoked salmon. Is this the sort of company we can trust with our environment? The net job gain to the area will be 7 full time equivalent jobs. We will pay a big price for such a small increase in employment. The potential damage to the environment is too great and the application should not be approved.

In December 2018 Marine Harvest the world's largest producer of farmed Atlantic Salmon held an AGM to change its name to MOWI in honour of its founder Thor Mowinckel. At that meeting the 84 year old Mowinckel voted against the name change in protest at what he saw as the company's record on pollution. He has advocated for more land based farms but MOWI have persisted in operating the more polluting and environmentally damaging open sea cage farm system.

Estimates on salmon mortality in sea cages have been as high as 20%. There is little information available on the disposal of these dead fish. 20% is a staggering

figure and there is no real assessment on the environmental impact of these mortality rates.

Research by Inland Fisheries Ireland and the Argyll Fisheries Trust (Scotland) has established that sea trout carry significantly higher levels of sea lice closer to marine sea cages. This published research indicates that the impact on sea trout smolts includes increased mortality, reduced body weight and changes to migratory behavior. There are significant sea trout fisheries all along the west coast and a number of premier sea trout fisheries close to Ballinskelligs bay. The impact of this salmon farm on these fisheries will be significant. The loss of the economic benefit of sea trout to the local economies of south west Kerry must be taken into account.

MOWI had their licence revoked by Minister Creed in 2019. The reason for revoking the licence was the scandalous behavior of a company which has no respect for the environment in which it works. MOWI were found to have overstocked their intensive farm by 121%. This shows contempt for all of the regulatory and environmental frameworks within which they operate. No company should be given a licence that has so blatantly disregarded their environmental and legal obligations.

I ask the minister to take our submission into account before taking any decision on this matter.

[redacted]
[redacted] NARA
[redacted]
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:35
**To:** FinfishPC
**Subject:** MOWI licence application ref no T06/202

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I wish to object to the renewal of the MOWI Deenish Licence application ref no T06/202. MOWI is a big Norwegian company only interested in making money . They provide a small number of jobs while at the same time destroying salmon and sea trout stocks! This has a huge effect on tourism jobs by reducing the number of Anglers coming to a particular area. Salmon farming also damages the environment due to the application of toxic chemicals to control sea lice and also by the deposit of fish faeces on the ocean floor. All these farm salmon licences need to be revoked and moved inland where there will be no need for toxic chemicals to treat sea lice. [redacted] Tuam Anglers Association

From: [redacted]
Sent: Monday, February 12, 2024 2:34 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref:No T06/202

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Good afternoon

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed,
[redacted]

[redacted]

Sent from iPhone

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:36
**To:** FinfishPC
**Subject:** Licence Ref:No. T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:39
**To:** FinfishPC
**Subject:** Ref:No. T06/202

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I want to object to renewal of the MOWI DENNISH licence application Ref:No.T06/202. As this licence was Revoked for Over stocking by MOWI in 2019 by former Minister for the marine Michael Creed. It should stay Revoked. MOWI should not be rewarded for breaking the conditions of their Licence.
Regards. [redacted]

From: [redacted]
Sent: Monday, February 12, 2024 2:39 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Deenish salmon farm objection

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Kind regards

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:40
**To:** FinfishPC
**Subject:** Mowi Deenish licence renewal

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I want to object to the renewal of the MOWI Deenish Licence application ref. no. TO6/202 as this licence was revoked for overstocking by former minister for the marine,Michael Creed.
MOWI should not be rewarded for breaking the conditions of their licence.
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:40
**To:** FinfishPC

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T06/202

I want to object to the renewal of the MOWI Deenish licence application Ref No T06/202 as this licence
was revoked for overstocking by MOWI IN 2019 by former Minister Michael Creed and it should remain revoked. MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

**From:** noel carr <fissta2017@gmail.com>
**Sent:** Monday 12 February 2024 14:42
**To:** FinfishPC
**Subject:** Fwd: Fissta submission to DAFM on Mowi renewal application for old 1995 license T06/202
**Attachments:** & Sea Trout Anglers.pdf

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Dear Minister/Charlie
I hope this finds you well.
Please find the enclosed submission from our Federation as approved by our National Executive Council.
Is mise le dochas,
Noel Carr Runai

From: Noel Carr National Secretary FISSTA - Federation of Irish Salmon and Seatrout Anglers Teelin Rd Carrick Co Donegal Ireland. Email:fissta2017@gmail.com
Tel: 00353(0)749730300
Text Mobile: [redacted]

# Federation of Irish Salmon & Sea Trout Anglers

F.I.S.S.T.A.

Conaidhm na Slat Iascairí Bradáin agus Breac Geal

F.I.S.S.T.A. www.fissta.com

Chairman: Mr. PAUL LAWTON, 37 Connoly Gardens, Ballyphehane, CORK City.

Secretary: NOEL CARR, Teelin Rd, Carrick, Co. Donegal. Tel: 074 9730300. Email: fissta2017@gmail.com


## T06/202 Public Consultation on an Aquaculture Licence and Foreshore Licence Application and Invitation for Public Submissions or Observations on Appropriate Assessment.

## SUBMISSION FROM FISSTA TO DAFM:

# FISSTA submission to Minister Charlie Mac Conalogue TD @ DAFM on Renewal and Review of MOWI License at Site Reference No:T06/202

TO MINISTER MAC CONALOGUE TD

Aquaculture Licensing Aquaculture & Foreshore Management Division
Department of Agriculture, Food and the Marine National Seafood Centre
Clonakilty Co. Cork P85 TX47

Signed: Noel Carr
Runaí an Comhaidh

F.I.S.S.T.A.

# Dear Minister Charlie Mac Conalogue,

FISSTA, the Federation of Irish Salmon and Sea Trout Anglers are Ireland's all island salmon and seatrout angling body representing the majority of the 20,000 club anglers and the sport on the many salmon and seatrout rivers north and south of the border. We are vehemently opposed to this Mowi application for a renewal and review as any new license:

**1.WOULD NOT BE IN COMPLIANCE WITH: EU Birds Directive 79/409/EEC AND EU Habitats Directive 92/43/EEC**

**2. WOULD BE PREMATURE SINCE ALAB HAS YET TO DETERMINE IF THE MINISTER HAS THE RIGHT TO REVOKE MOWI'S 1995 DEENISH LICENSE IN APRIL 2019 (under S19 (a)4 of the Fisheries Amendent Act 1997) DECISION BY MINISTER CREED.**

**3. NO LICENSE FOR THAT SITE EXISTS SO ANY APPLICATION FOR REVIEW OR RENEWAL IS VOID AND ONLY A NEW APPLICATION FOR A LICENSE WOULD BE IN COMPLIANCE WITH SECTION S19 (a)4.**

**4. AS OF THE 12th FEBRUARY TODAY NO SUBMISSIONS OR OBSERVATIONS BY MOWI HAVE BEEN LOGGED ON YOUR WEBSITE BY THE 9th FEBRUARY 2024 DEADLINE IN ACCORDANCE WITH THE PROVISION OF SECTION 46(1) OF THE FISHERIES AMENDMENT ACT 1997 WHICH THE ALAB BOARD REQUESTED IN RELATION TO ANY OF THE DOCUMENTS LISTED IN THE SCHEDULE ATTACHED FOR AP1/2019.**

## Schedule of Documents
## MOWI

| Date Document Received | Document Title |
|---|---|
| 11-Dec-2019 | DAFM File |
| **Observations** | |
| 15-May-19 | Submission by [redacted] to ALAB |
| 18-May-19 | Submission from [redacted] to ALAB |
| 07-Jun-19 | Submission from Inland Fisheries Ireland (IFI) |
| 07-Jun-19 | Submission from Galway Bay against Salmon Cages with attachments:<br>• Friends of the Irish Environment: Submissions to the Minister<br>• DCCAE and IFI Views and Requirements |
| 09-Jun-19 | Submission from Salmon Watch Ireland |
| 19-Dec-19 | Observations submitted by the Minister of Agriculture, Food and the Marine and Department of Agriculture, Food and the Marine (DAFM) |
| **Information Gathering** | |
| 03-Mar-20 | • Acknowledgement of S46 notice dated 10 February 2020 from the Minister for Agriculture, Food and the Marine<br>• Letters from Chief Sate Solicitor's Office |
| 06-Jul-20 | Marine Institute response to S47 dated 24 June 2020 |
| 19-Aug-20 | BIM response to S47 dated 24 June 2020 |

AP1/2019 – Deenish Schedule of Documents

| | |
|---|---|
| 22-Jul-20<br>27-Jul-20 | Department of Agriculture, Food and the Marine (DAFM) response to S47 of 24 June 2020<br>Supplementary observations to ALAB from DAFM (contained in document listed above) |
| 25 Nov-20 | Marine Institute Reply to S47 dated 30 October 2020<br>• Briefing Paper on Maximum Allowable Biomass<br>• Annual Benthic Review Documents from 2005 to 2019 |
| 03-Apr-23 | Marine Institute response to S47 dated 7 March 2023<br>• A review of Benthic Monitoring at Irish Finfish Aquaculture Sites during 2020, dated 20 April 2021<br>• A review of Benthic Monitoring at Irish Finfish Aquaculture Sites during 2021, dated 24 February 2022 |

## CONCLUSION

**FISSTA, not withstanding the four issues raised on page one summarise without prejudice our submission of objection to the proceedings underway. We believe that further legal action will be necessary downline, so it is important that any serving Minister understands the clear implications of this salmon farming /PRODUCE TO POLLUTE FEEDLOT being allowed to continue in Deenish.**

**Norwegian fisheries giant Mowi has applied to the Department of Agriculture for a new licence for its controversial salmon farm in close proximity to vital salmonid rivers in County Kerry.**

In a new aquaculture and foreshore licence application filed with the Department of Agriculture, Silver King Seafoods Limited, a company owned by Mowi Ireland, said the licenced facility would employ a minimum of seven people. "The company is fully integrated with breeding, growing, harvest, processing and sales facilities in Ireland," it said.

The firm said on-site staff would be supported by the Mowi Ireland "sub aqua dive team, an in-house veterinarian and technical support staff".

Making the decision to strip the facility's licence in 2019, Mr Creed said in 2016, Mowi Ireland harvested 1,100 tonnes of salmon at the site, instead of the permitted 500 tonnes. He said this led to a rise in effluent discharge from the Deenish site.

In its submission to ALAB, Mowi Ireland said there was no breach of its licence conditions. It argued that when the licence was granted in 1995, "harvesting" referred to killing fish on-site. It said the fish reared at the Deenish facility were taken to Castletownbere in Cork to be slaughtered.

The company also denied there had been a rise in effluent discharge from the site.

Mowi Ireland also previously pointed to issues with the slow pace of the Irish licensing system, saying it had sought renewal and improvement of the Deenish licence in 2007.

In September, Mowi Ireland announced it would cut 33 of its Irish staff.

The firm, which employed 265 people in Ireland before the cuts, had flagged difficulties at its Irish operations after warmer than normal sea temperatures impacted the amount of salmon fished in Ireland.

The company, which is the world's largest producer of Atlantic salmon, said the warmer than normal temperatures impacted on the growth of its fish and hindered its projected salmon production for this year.

# FISSTA WILL OPPOSE ON ALL LEGAL GROUNDS POSSIBLE AS HAS BEEN OUR POLICY SINCE 1999

We will legally oppose on the following principal grounds of challenge, albeit largely in general terms: As regards the Deenish Aquaculture Licence Decision and ALAB Determination, the State Respondents allegedly failed to: i. transpose correctly Directive 2014/52/EC (the "2014 EIA Directive") by Regulation 8 of the Aquaculture Appeal (Environment Impact Assessment) (Amendment) Regulations 2019 (S.I. 276 / 2019) (the "EIA Regulations")
As regards the Deenish Foreshore Licence Decision and 1995 Foreshore Licence Grant, the Minister allegedly failed to: i. comply with certain obligations arising in respect of environmental impact assessment ("EIA") that are claimed to arise pursuant to s.13A of the Foreshore Act 1933, as amended (the "1933 Act"), including:

(i) comply with s.13A of the 1933 Act by not undertaking EIA and/or informing the public of reasons and considerations on which the decision to grant consent was based, contrary to Article 9 of the EIA Directive;
(ii) conduct a screening for Appropriate Assessment for the aquaculture activity that was ultimately licensed by ALAB,4 breaching Article 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 / 2011) (as amended) ("Habitats Regulations"), and pursuant to Directive 92/43 (the "Habitats Directive");
(iii) account for the alleged fact that the project for which the Foreshore Licence Grant was made was not that for which the Minister had carried out EIA and screening for Appropriate Assessment for the purposes of the Habitats Directive;5 iv. act lawfully in various pleaded ways, namely, alleged failure to: 2 SG Core Ground E18 3 SG Core Ground E9D and E17C (which the Applicants plead is the "same as ground 9D above") 4 SG Core Ground E9E 5 SG Core Ground E9A and E13A; E17A (which the Applicants plead is the "same as ground 9A and 9B above").
In fact, the grounds are not the same. 4 (1) consider the public interest in accordance with s.3(1) of the 1933 Act;6 (2) give proper authorisation to MOWI contrary to s.3(1) of the 1993 Act and, allegedly, Article 9 of the EIA Directive;7 (3) give effect to s.82 of the 1997 Act in respect of "having regard" to a relevant decision of a licensing authority concerning an aquaculture licence;8 (4) issue a lawful licence, rather than a replacement for a licence which had a 'clerical error";9 (5) comply with Article 4(1)(a)(i) to (iii) of Council Directive 2000/60/EC (the "Water Framework Directive").10 6. These submissions address the following: a. summary of the State Respondents' key submissions; b. overview of the factual background; c. preliminary objection to inadequate pleading contrary to Order 84 rule 20(3) of the Rules of the Superior Courts ("RSC"); d. grounds concerning the 2015 Aquaculture Licence Decision and ALAB Determination; e. grounds concerning the 2015 Foreshore Licence Decision and 2022 Foreshore Licence Grant. 7. For the avoidance of doubt, the State Respondents maintain all grounds of opposition pleaded in their Amended Statement of Opposition. 8. For a number of reasons, the State Respondents are placed at a real disadvantage in opposing the broad ranging claims that are made against them by the Applicants. In particular:

# FISSTA - WHO WE ARE.

FISSTA, the Federation of Irish Salmon and Sea Trout Anglers are Ireland's all island salmon and seatrout angling body representing the majority of the 20,000 club anglers and the sport on the many salmon and seatrout rivers north and south of the border.

The affiliated club structures supports an industry of sport and tourism that employs over 12,000 jobs and is valued at over €750 million to the Irish economy.* They play a vital role in the conservation of our wild salmon and seatrout habitat and lobby government for to improve the lot of the fish and angling conditions. Their campaigns against the commercial netting, salmon farming, sealice and other threats to the life cycle of the salmon challenges all anglers to play their part and use their voluntary effort to ensure future generations continue to enjoy the king of fish.

FISSTA is club member driven organisation of volunteers who receive no state funding so they can speak with an independent voice for the angler. Inspired and supported by the voluntary efforts of its members, FISSTA was established in 1986 and succeeded the STCI - Salmon & Trout Council of Ireland to become a more effective lobby group to improve and assist the lot of the Irish angler. During the past years the Federation has assisted many angling members to protect their salmonid angling waters by organising them into formally registered clubs on the best salmon rivers of Ireland.

A key aspiration for all voluntary clubs is to provide all members with the most competitively priced local angling and to develop community tourism so that we can share with visiting anglers. On every fishery we encourage and welcome visitors to fish with us - but not as on some public waters, instead of us. This requires a club to have in place the FISSTA insurance scheme that protects both visitors and the personal assets of our registered club officers and membership.

FISSTA clubs are located all over Ireland and engage with the three state authorities of Inland Fisheries Ireland, the Loughs Agency in Foyle catchment and Carlingford and DAERA in the north eastern part of the island. As the premier provider of Irish salmon and seatrout angling FISSTA welcomes and develops angling tourism as a means to improve the facilities for all who engage in this age old traditional sport. Frequently, the lobbying often leads to organised campaigns such as the one to end driftnetting which lasted for over twenty years of hard political campaigning which ended successfully on November 2006. Since this time, the stocks of wild Atlantic salmon returning to our rivers has improved significantly in many places but not everywhere as much more has to be done in our quest for abundance. The angling community can be found everywhere there is a river or lake in this country and while there are many non-club affiliated salmon anglers, like some who fish on private waters, but most form into clubs to develop their sport, protect fish stocks and insure their members. There are over 450 locally formed clubs involved in Irish game angling, and many are engaged in wild brown trout along with salmon and seatrout However, Irish salmon and seatrout angling have a wide appeal with many visiting anglers registering on our waters on an annual basis. There is an average of 17,000 licensed Irish salmon anglers who pay up to €100 annually for a state license to fish on the major rivers such as the Moy, Blackwater and Feale, many of which are managed by the local salmon and seatrout club that are affiliated to FISSTA.

The general ethos of a local FISSTA club is to make angling available to both local and visiting anglers who are insured in line with international outdoor tourism regulations. While over half of these anglers register through the FISSTA network of clubs (average 85 associations) as season members, over an average of 14,000 of these anglers are provided with season or day angling tickets annually. It is through this club membership system that FISSTA represent their interests by lobbying Government, fostering a love for the sport in youth programmes and raising an environmental awareness for the conservation of our wild Atlantic Salmon at home and abroad where we have represented Ireland as an accredited NGO - non government organisation at international conferences for over 25 years.

FISSTA campaign for the rights of anglers and conservation of wild salmonid stocks and will support a club in need to rectify any particular issue on their waters. FISSTA seek fair access to angling waters for the local club angler at a reasonable cost and continue to seek the right for a 7 year secure tenure for all Irish angling clubs leasing state waters. As an effective umbrella body for salmon and seatrout anglers it is a strong voice for the conservation of salmon both nationally and internationally since 1991 when we were founding members of NASF - North Atlantic Salmon Fund. Since 1991, we have supported and assisted the NASF brokered buyout agreements negotiated by Chairman Orri Vigfusson R.I.P. in the Faeroes and Greenland to protect our migrating salmon in these feeding grounds. Orri's legacy continues with protection agreements with the commercial netting sector being renewed annually to protect our dwindling stocks. We are campaigning since 2017 to have our government contribute their share to the new 12 year NASF and ASF buyout negotiated and agreed in May 2018 for which our wild salmon will receive continued protection in the North Atlantic feeding grounds.

The FISSTA campaign against sealice and salmon farming has been supported by NASF who negotiated a new Norske Industri roadmap for the wild Atlantic salmon in May 2017 which promises to have salmon farmers such as MOWI sea lice free by 2022.

Our motto is "Committed to Conservation" and we continue to work to achieve the abundant return of the wild Atlantic salmon to our waters. FISSTA are affiliated to the 75,000 strong membership of the Irish Sports Coalition who support our campaigns. FISSTA are accredited NGO at North Atlantic Salmon Conservation Organisation - NASCO where the 19 wild Atlantic salmon countries including Ireland meet at conference annually. FISSTA fight for angler's rights and waters and are founders and supporters of successful campaigns such as Stop Salmon Drifitnets Now and Galway Bay Against Salmon Cages who continue to lobby against farmed salmon cages plans being revived.

*Tourism Development Ireland Report 2014 commissioned by Inland Fisheries Ireland

Federation of Irish Salmon & Sea Trout Anglers

Comaidhreas na Slat Iascaireachta Breáthnaigh agus Breac Geal

0303

F.I.S.S.T.A.

**FISSTA elect a National Executive Council each year to run the organisation and implement the policy and directives from the AGM.**

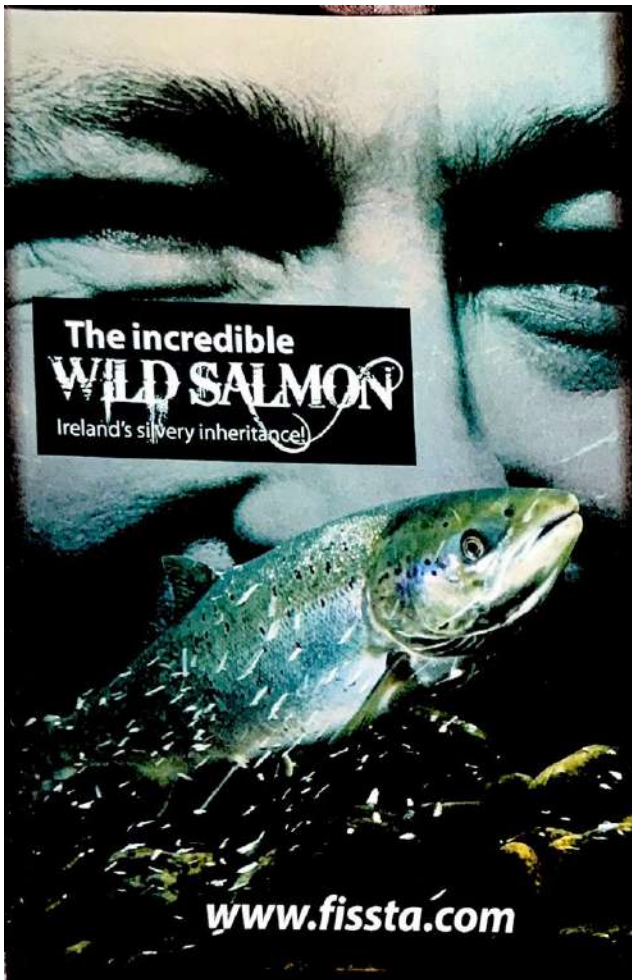
## FISSTA NATIONAL EXECUTIVE COUNCIL 2023-24

| | | | |
|---|---|---|---|
| **PRESIDENT: TON MORAN** | 2 Fr Meehan Place, Springfield, Castlebar, Co. Mayo | 087 29150*3 | |
| **CHAIRMAN: PAUL LAWTON** | 37 Connoly Green, Ballyphehane, Cork. | 083 4185373 | paul.lawton@hotmail.com |
| **VICE-CHAIRMAN: BRIAN HEGARTY** | Malinmore, Glencolmcille, Co. Donegal | 086 6854987 | hegartybrian@eircom.net |
| **SECRETARY & PRO: NOEL CARR** | Teelin Road, Carrick, Co. Donegal. | 074 9730300 087 235200* | fissta2017@gmail.com |
| **ASST.SECRETARY: MICHAEL STINSTON** | Dreenan Cottage, Dreenan, Boa Island, Kesh, Co. Fermanagh. BT93 8AA | 07447890358239 | mick.stinson@hotmail.com |
| **TREASURER: DONAL O' DOHERTY** | Knockanes, Headford, Killarney, Co. Kerry | 087 9903739 | odohertydonal@yahoo.co.uk |
| **VICE PRESIDENT : RICHARD BEHAL** | 68 Arbutus Grove, Deerpark, Killarney. Co. Kerry | 087 4100391 | |
| **NORTH-WESTERN RIVER BASIN DISTRICT & LOUGHS AGENCY** | | | |
| **ALAN SPENCER** | Pinewood, Carrowcor, Dromore West, Co Sligo | 096 47929 | alanspencer1@hotmail.co.uk |
| **DAVY STINSON** | Dreenan Cottage, Dreenan, Boa Island, Kesh, Co. Fermanagh. BT93 8AA | 048 66631951 | fisherdavy@aol.com |
| **GAVIN DUFFY** | Rosemount, Letterkenny, Co. Donegal | 086 3899310 | duffy.gavin@gmail.com |
| **JOHN BOYLE** | Rosses, Loch Tunny, Dungloe, Co. Donegal | 087 2616337 | seanobaoill@gmail.com |

| | | | |
|---|---|---|---|
| **WESTERN RIVER BASIN DISTRICT:** | | | |
| **BILLY SMYTH** | 10 Colemans Rd. Shantalla, Galway | 086 3511628 | billysmyth0@gmail.com |
| **TOM BOURKE** | Loughloon, Westport, Co. Mayo | 086 8331586 | tbourkefishingwestport@gmail.com |
| **STEVEN GREANEY** | Secretary Ballindiff Bay Anglers, Headford, Co. Galway. H91 K3OH | | stevengreaney88@gmail.com |
| **DON STIFFE** | Annaghkeen, Headford, Co. Galway. H91R8C3 | 086 8149832 | dstiffe@yahoo.ie |
| **EASTERN RIVER BASIN DISTRICT (INCL BEAGH BANN)** | | | |
| **DAVID MAGILL** | Killiney, Co. Dublin | 087 3173926 | davidmagill@eircom.net |
| **SHANNON RIVER BASIN DISTRICT:** | | | |
| **STEPHEN PRENDIVILLE** | Gurtcreen, Killocrim, Listowel, Co. Kerry | 087 7441810 | stephenprendiville@hotmail.com |
| **WALTER COFFEY** | Toartaoscan, Ennis, Co. Clare | 086 347 4444 | |
| **WILLIAM O'HALLORAN** | 13 Mount St, Golf Links Rd, Castletroy, Limerick | 086 374 4927 | williamohalloran@eircom.net |
| **KEVIN HANNAN** | 16 Pennywell Rd, Limerick | 086 086 5854 | kevinhannan@yahoo.co.uk |
| **SOUTH-WESTERN RIVER BASIN DISTRICT:** | | | |
| **JIM O SULLIVAN** | New Rd., Killarney, Co. Kerry | 087 7134349 | jmosullivan@yahoo.ie |
| **TONY MILNER** | Curravouch South, Tralee, Co. Kerry | 087 1313425 | |
| **SOUTH - EASTERN RIVER BASIN DISTRICT:** | | | |
| **DJ O' RIORDAN** | 8 Fair Hill, Killarney. Co. Kerry | 064-6631743 | |
| **BILLY COTTER** | Nountanane, Kilorglin, Co. Kerry | 087 2105080 | |
| **ARTHUR SOBEY** | Broad Oaks, Rosebank, Douglas Rd, Cork | 086 2540547 or 021 489088 | arthursobey@eircom.ie |

Non-Government Observers at NASCO - North Atlantic Salmon Conservation Organisation
Founder Members: NASF - North Atlantic Salmon Fund; EAA - European Anglers Alliance; SOS - Save Our Seatrout; Cara na Mara - Stop Salmon Driftnets Now Campaign; Salmonid Sanctuary Programme www.fissta.com

*"Committed to Conservation"*




# The incredible Wild Salmon

## *Ireland's silvery inheritance!*

## The wild salmon meet numerous challenges

The decline in wild salmon stocks in Ireland and countries surrounding the North Atlantic Ocean is very alarming. Stocks have reduced by more than 80% during the last 30 years. Salmon is now extinct in 11 countries. Historically, it is different forms of river developments (hydro power stations, barriers, gravel excavation etc) in addition to environmental pollution and acid rain that have wiped out salmon stocks around the North Atlantic Ocean. The major threats for the wild salmon in Ireland today are:

- The commercial draftnetting of salmon which must end now as August extensions ruin any recovery chance
- Sea lice: a seriously increasing threat to migrating smolt due to intensive fish farming
- Escaped farmed salmon: significant problem due to genetic interference with wild spawning stocks
- The lack of protection and the licensing of draftnetting in closed rivers
- The danger to Ireland from diseases such as Gyrodactylus salaris: GS is deadly parasite killing fry, parr and smolt destroying a number of Norwegian salmon rivers. Fish farms import eggs/ova that could spread ISA & GS.
- Acid rain: affected water quality and destroyed stocks but improvements due to lime treatment
- River water regulation: numerous salmon stocks affected and threatened by large and small ESB hydro power stations
- Overfishing: draft or estuary netting of wild salmon stocks
- Pelagic fisheries: 'hidden' catches of juvenile salmon when trawlers fish for other fish in the North Atlantic Sea
- Global climate: dramatic changes in the food supply in the Atlantic due to temperature increase

Issued by :

*Federation of Irish Salmon & Sea Trout Anglers*
FISSTA *Comaidlíocht na Slat Iascaireachta Bradán & Breac Geal*

## Support this campaign with a donation now.

With kind support from our Norwegian salmon angling colleagues
www.niffo.no www.laksleelver.no www.wwf.no

## The silver-covered nomadic king of fish

For thousands of years the salmon has fascinated people with its dual life in rivers and the sea, and with its fantastic ability to force a way up rivers, wild rapids and waterfalls.

The salmon has a nomadic life cycle, migrating to the sea as a smolt after 2 – 5 years in its native river and then returning to start the next cycle of new generations of salmon. The migration to the sea starts during early spring time when the sea temperature is around 8°C. It remains a mystery how the smolts, far up the rivers, know when to begin their journey. Smolts are very vulnerable during this period and numerous are eaten by predators including birds and other fish.

Additionally, when they reach the sea, smolts face serious infectious threats from the sea lice population. At present, only 2 – 5% of migrating smolts return back to their rivers as adult salmon.

The salmon stay in the North Atlantic for 1 – 3 years, feeding mainly off the coasts of Greenland and the Faroe Islands in the Atlantic Ocean before they return to their native rivers. Incredibly, they even find their exact pool or stretch of river where they hatched and grew up. This is after a sea journey of more than 5,000 kilometres and then often a battle with strong rapids in rivers and the necessity to leap waterfalls of 4 metres .

Nobody appears to know exactly how the salmon find their way back to the rivers. A combination of magnetic iron in their body sideline and brain, in addition to a strong sense of smell could play an important part. The first salmon show up in the rivers in early springtime and spawning takes place during October to January.

The size of the salmon is quite impressive – they can reach up to 1.5 metres and weigh more than 30 kilograms . The cock salmon (male) is normally bigger than the hen fish (female) which is seldom over 20 kilos. The longer the salmon has been in the sea the larger it becomes. The largest rod-caught salmon was caught on the Tana River, Norway and topped the scales at 35.89 kilos or over 70 lbs. The largest rod caught salmon by a woman was 63 lbs in 1921 in UK.

Smaller salmon stay in the sea for one year (one winter salmon or grilse) and gain around 1 – 3 kilos in weight. Salmon over 7 kilos are regarded as large salmon (three winter salmon).

Fishing for salmon is a popular sport and leisure pursuit and between 30,000 – 50,000 anglers fished for salmon and seatrout in Irish rivers until the recent decline due to restrictions and the rod license fee increases (from €28 to €135 per season).

This activity brought in more than €70m. to the rural economy representing the equivalent of 2,000 jobs annually.

*Salmo Salar is the Latin name for the Atlantic salmon. Salmo means salmon and Salar means the springer.*

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:44
**To:** FinfishPC
**Subject:** Licence Ref: No. T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,

Kindly note that I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

I would respectfully suggest that MOWI should not be rewarded for breaking the conditions of their licence.

Sincerely,

[redacted]



**From:** [redacted]
**Sent:** Monday 12 February 2024 14:51
**To:** FinfishPC

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Hi there,

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,

[redacted]

Sent from Outlook for Android

From: [redacted]
Sent: Monday, February 12, 2024 2:55 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: MOWI Deenish Salmon Renewal Licence.

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The same criteria still exist for refusal of the original Licence , Wild Salmon stocks must be protected j at all costs and fish farms are a known danger to returning wild fish to their breeding rivers. Abolish this application and ensure the continuing survival of this fish species for future. generations [redacted]

Sent from my iPhone [redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:54
**To:** FinfishPC
**Subject:** Licence Ref:No. T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Hi,
l want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed,
[redacted]

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:58
**To:** FinfishPC
**Cc:** [redacted]
**Subject:** Ref No: T06/202_Deenish Island Salmon Farm licence - Observation and objection of Boyne Catchment Anglers Association

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To whom it may concern,

I wish to register the concerns of the Boyne Catchment Anglers Association (BCAA) to the Salmon Farm Licence for Deenish Island. It is our contention that this will further destroy the wild sea trout and salmon population in the region and nationally. We are also concerned about the detrimental effect to tourism (specifically angling tourism) to the region & nationally as a consequence of diminishing salmon and sea trout populations in the region and nationally.

Salmon farming is one of one thousand cuts leading to the death of the nation's natural ecosystems, wildlife habitats and environment. The provision of this licence is clearly contrary to national & EU legislation on the protection of ecosystems, environment, water quality and habitats.

Further, as this licence was revoked for overstocking by Silver King Seafoods Ltd (MOWI) in 2019 by former Minister for the Marine, Michael Creed, it should remain revoked. This organisation should not be rewarded for breaking conditions of their licence, as this undermines the authority of the licensing system, and infers that businesses can act as they wish without fear of reproach, punishment or being held to account for their actions. It would be a very ill judged precedent to be set.

We are strongly of the opinion that this licence should not be granted and should be terminated altogether, given the breaches of condition by the applicant.

Best regards,

[redacted]

[redacted]

Boyne Catchment Anglers Association

**From:** [redacted]
**Sent:** Monday 12 February 2024 14:59
**To:** FinfishPC
**Subject:** licence Ref:No. T06/202

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed:

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 12:15
**To:** FinfishPC
**Subject:** Objection to Mowi Deenish Licence

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Regards
[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:01 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: T06/202

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Hi

I wish to object to MOWI Deenish licence application T06/202.

[redacted]
Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:00
**To:** FinfishPC
**Subject:** The scandal of licensing salmon farms, with special reference the MOWI Deenish renewal application (Ref.-no. T06/202)

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Dear Minister,

As an experienced salmon angle of more than five decades, I am writing to add my voice to the many friends of the natural environment who are objecting, in the hope of being heard against the powerful lucre-oriented "aquaculture " lobby, to the renewal of the MOWI Deenish salmon farm licence (application Ref.-no. T06/202). I need not rehearse for you the well known -- and that means already well known to you, too, and to your officials -- litany of damage that salmon farms do to the natural environment, which it is your duty to protect, and in particular to the severely threatened and rapidly dwindling stocks of wild salmon and sea trout.

As I hope you realise, this is basically a moral question, and one of great importance, concerning the state in which we leave this world to our children and to all future generations. To renew the MOWI licence -- and indeed to grant or renew any such licences -- would be a truly shameful act.

It should be worth pointing out that the licence in question was revoked in 2019 due to a violation of its terms by MOWI. In view of such a violation of trust, that organisation should not now be trusted with a renewed licence.

Yours respectfully,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:05
**To:** FinfishPC
**Subject:** Ref: T06/202

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I object to the above referenced licence application by WOWI Deenish, on the grounds that they breached the conditions of a previous licence granted by the Irish government.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:12
**To:** FinfishPC
**Subject:** Licence Ref:No. T06/2024

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I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:32
**To:** FinfishPC
**Subject:** Deenish Salmon Farm Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,

Kindly note that I wish to object to the renewal of the MOWI Deenish license application Ref: No. T06/202.

As this license was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

I would respectfully suggest that MOWI should not be rewarded for breaking the conditions of their license.

Sincerely,

[redacted]

--
Best Regards,
[redacted]
- - - - - - - - - - - - -
[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:36 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202

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I wish to object to the renewal of this licence as this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:36
**To:** FinfishPC
**Subject:** T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir,

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.
As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed,
[redacted]

Sent from Outlook for Android

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:37
**To:** FinfishPC
**Subject:** renewal of the MOWI Deenish licence application Ref:No. T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To Whom it May Concern,

I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202, this objection is based on a previous history of overstocking by MOWI.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:38
**To:** FinfishPC
**Subject:** Ref T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may concern,

We wish to object in the strongest possible terms to the renewing of license application number T06/202 made by Mowi in relation to a facility at Deenish Island. This licence had been previously revoked by the former minister , Michael Creed, due to Mowi knowingly over stocking it's facility at Deenish Island contrary to the terms of its licence.

The blatant disregard for the terms of the licence and deliberate over stocking have possibly contributed to an increase in sea lice which are known to be devastating to sea trout and salmon. The decline in sea trout numbers entering Lough Currane and rivers in the Waterville system has been ongoing for a number of years which we believe has been as a result of the impact of open net cage aquaculture. The loss to the local economy in terms of lost revenue from angling tourism has been immense and correlates with the decline in sea trout returning to Lough Currane. Jobs in the hospitality industry have been lost as a direct result of the decline of the fishery.

We urge the Minister and the Department to make the right decision, for the sake of our environment and local economy, and not renew licence T06/202,

Yours sincerely,
[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:38 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Re: I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202

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My address is
[redacted]

> On 12 Feb 2024, at 15:35, [redacted] wrote:
>
> I wish to object to the renewal of this licence as this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
>
> [redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:44 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: : Deenish Salmon Farm Objection

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Date: Mon, Feb 12, 2024
3:43pm

Dear Minister,

Kindly note that I wish to object to the renewal of the MOWI Deenish license application Ref: No. T06/202.

As this license was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

I would respectfully suggest that MOWI should not be rewarded for breaking the conditions of their license.

Sincerely,
[redacted]
[redacted]y
[redacted]

Sent from my iPhone

From: [redacted]
Sent: Monday, February 12, 2024 3:44 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Objection to MOWI Deemish Licence

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Dear Minister,

Kindly note that I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

I would respectfully suggest that MOWI should not be rewarded for breaking the conditions of their licence.

Sincerely,

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:45 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Deenish salmon farm objection

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,

Kindly note that I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

I would respectfully suggest that MOWI should not be rewarded for breaking the conditions of their licence.

Sincerely,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:45
**To:** FinfishPC
**Subject:** MOMI Renewal Application for Their Deenish Island Salmon Farm Site ref. T06/ 202

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To whom it may concern

Dear Minister McConalogue,

I wish to object to the renewal of the MOWI Deenish licence application on the grounds that this licence was revoked by the former Minister for Agriculture, Food and the Marine, Michael Creed in 2019 for overstocking by 121%. This is a disgrace to our Irish environment to has such toxic industries in our waters.
Minister, if you renew this licence you will be rewarding MOWI for breaking the conditions of their licence and set a dangerous precedent for future licence infringement cases. It will be our your shlders minister.
As the Deenish salmon farm is operating in Kenmare River SAC and Deenish Island and Scariff Island SPA, the EU Habitats Directive precautionary principles should apply and the MOWI renewal application should be refused. End
Rgrds [redacted]
[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:46
**To:** FinfishPC
**Subject:** Ref no. T06/202

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

A Chara,

I would like to place an objection to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. Research shows that these farms are detrimental to salmon stocks, especially if unregulated or non compliant. Salmon plays a much larger role on the west coast both economically and culturally than fish farms. Unfortunately, the two do co-exist well, not mind if there is a lack of compliance.

Le meas,

[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:46 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Renewal of MOWI Deenish salmon farm licence

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I would like to object to the renewal of this licence.

[redacted]
Sent from my iPhone

From: [redacted]
Sent: Monday, February 12, 2024 3:47 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Licence ref no T06/202

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Please note I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
The serious repercussions of salmon farming on wild salmon are well known at this time.

[redacted]

Sent from my iPhone

From: [redacted]
Sent: Monday, February 12, 2024 3:48 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: MOWI Deenish License

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Minister,

Kindly note that I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202.

As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

I would respectfully suggest that MOWI should not be rewarded for breaking the conditions of their licence.

Sincerely,

[redacted]

Sent from my iPhone

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:48
**To:** FinfishPC
**Subject:** Ref: T06/202 Objection

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sirs

I wish to object to the renewal of the MOWI Deenish Licence application Reference number T06/202 as this licence was revoked for over stocking by MOWI in 2019 by Minister Creed and it should stay revoked.

Yours Sincerely

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:48
**To:** FinfishPC
**Subject:** MOWI Deenish Licence Ref No T06/202-Objection to Renewal

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

A Chara,

I note that this licence was revoked as a result of the salmon cages been overstocked in 2019.

Michael Creed was the Minister at the time. I want the licence to stay revoked,

and all current  licences be withdrawn to halt the expansion of such a toxic and damaging industry.

Your attention to my strong objection is much appreciated.

Kind regards,

[redacted]

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:51
**To:** FinfishPC
**Subject:** Objection: Licence Ref. No. T06/202

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To the Minister for Agriculture, Food and the Marine

I wish to object, in the strongest terms, to the renewal of the MOWI Deenish
Licence application Ref. No. T06/202.
This licence was revoked for overstocking by MOWI in 2019 by former Minister of Marine, Michael Creed. It should stay revoked!
MOWI should not be rewarded for breaking the terms and conditions of their licence. For too long have MOWI / Marine Harvest, the Norwegian carpet-baggers and their proxies exploited and destroyed our Marine environment. If this was a land based agricultural enterprise it would be prosecuted for the environmental damage it causes.

Your faithfully

[redacted]

[redacted]
Newport Angling Club
[redacted]
[redacted]
[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 3:53 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref no. T06/202

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Mowi Deenish renewal salmon farm licence

I wish to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202 as this licence was revoked for overstocking by MOWI IN 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. They should not be rewarded for breaking the conditions of their licence.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 15:55
**To:** FinfishPC
**Subject:** Submission on Application T06/202
**Attachments:** T06-202 Submission.docx

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To Whom It May Concern
Please find attached my submission on this application. Also included below in case attachment is not received.
Yours sincerely
[redacted]

[redacted]

#

To Whom It May Concern

I wish to register my objection to the proposed renewal of a salmon farn licence (application no. T06/202) for a site at Deenish Island, Co. Kerry by Mowi Ireland, through Silver King Seafoods Ltd.

My objection is based on the following grounds:

**1. Previous Record**

The site in question was the subject of a licence revocation by the Minister in 2019, in response to the flagrant breach of the previous licence conditions, wherein the applicant was found to have harvested more then 1,100 tonnes of salmon in 2016, which was far in excess of the licensed tonnage of 500t.

Despite the order to close, the salmon farm on the site has continued to operate while the licence revocation was heard by the Aquaculture Licensing Appeals Board (ALAB).

The decision on that appeal has not yet been made or communicated to the public.

It is a flagrant breach of due process, and obvious means of circumventing the decision of the Minister, and pending decision of ALAB, to make a fresh application for a new/amended licence. Such an application should not be entertained until the decision of ALAB has been made and any further appeals heard.

This is akin to a disqualified driver applying for a new licence while disqualified for previous motoring offences. It is, quite simply, an abuse of process and contrary to natural justice. The Minister must recognize this and refuse to consider this application.

Notwithstanding the point above, I will list other grounds for objection, which in themselves should disqualify this project.

**2. Impact on Wild Salmonids**

It is well established that sea lice from salmon farms results in increased mortality of wild salmon and sea trout from nearby rivers (Thorstad *et al*, 2015; Shephard & Gargan, 2020). In the case of Deenish Island, the nearby Waterville Fishery (Loughs Currane, Derriana, Namona and Cloonaghlin) is a renowned salmon and sea trout fishery which was previously a thriving tourism angling destination. In recent years, heavy sea lice infestations have resulted in a collapse in sea trout stocks in particular, with salmon numbers also in steep decline. This has coincided with the overstocking of Deenish salmon farm.

In spite of the negative impacts of a salmon farm ***licensed*** to harvest 500 tonnes annually, and the ***actual*** harvest of more than twice the permitted tonnage, this application seeks to multiply the licensed tonnage to a standing stock biomass (SSB) of 2.200 tonnes. There is no mention of a target harvest, however it is self-evident that a SSB of 2.200 tonnes of salmon on site at any one time means a harvest far in excess of that. This application essentially is for a licence to farm 5-8 times more salmon and is

The revocation by the Minister of the farm licence in 2019 offered a ray of hope for salmon and sea trout in the Waterville area, however the continued operation of the farm in the years since has seen stocks fall even further, and this application for a much increased tonnage of farmed salmon, with consequent massive increase in sea lice levels, will result in the almost certain extinction of wld salmon

and sea trout in Lough Currane. This would have serious negative consequences for tourism and employment in Waterville.

**3. Environmental Impact Assessment**

*Literature review*

THE EIA assessment of the impact of sea lice on wild salmon and sea trout does address the scientific literature in a way that previous EIA applications have singularly failed to do. There is a welcome acknowledgement of the many papers which found significant impacts, rather than the continued reliance on a single (largely discredited) piece of research by the Marine Institute.

Unfortunately, however, the authors still credit this paper with some scientific merit, and base their conclusions on it. There is clear bias inherent in this conclusion. We no longer base policy on climate change on a tiny minority of dissenting research, we base it on the vast consensus stating that climate change is caused by anthropogenic factors. We must also base policy on salmon farms on the vast consensus of scientific literature, not merely quote it only to then ignore it. This EIA is opinion and commercial necessity dressed up as science.

*Sea lice control*

Furthermore, the EIA relies heavily on the assumption that lice numbers will be controlled on this proposed installation. Experience, and the record, shows that it is extremely difficult, if not impossible, to control lice numbers at all times on salmon farms. In recent years, increased sea temperatures have led to massive outbreaks of Amoebic Gill Disease (AGD) and jellyfish blooms, which have caused large mortalities on Irish salmon farms, including those operated by MOWI.

Farmed salmon infected with AGD and/or suffering from jellyfish blooms go off their feed for prolonged periods, which removes the possibility of treating for lice infestations with in-feed pesticides, and results in increased lice levels on farms.

Furthermore, the reliance on cleaner fish as a strategy to remove lice is unsustainable. The wrasse used are taken from the wild in a completely unregulated and unlicensed fishery, used for one growth cycle then killed when the salmon are harvested. These are slow-growing, slow-reproducing fish and many Irish bays are already depleted of wrasse by this fishery. There is no long-term viable sustainable fishery possible for these wrasse, and relying on an uncertain supply is not an acceptable strategy for lice management.

*Theoretical modelling*

The EIA relies heavily on theoretical modelling of lice dispersal to state that lice from the salmon farm will not be an issue. However, lice from the existing farm are already a major issue, with heavy lice infestations on early-returning sea trout smolts a regular feature over the last 10 years in Waterville, and the collapse in sea trout stocks the result.

We are supposed to believe that a farm 5 -8 times the size of the *existing licence* would have no impact, when a serious impact is already evident. Computer modelling is clearly insufficient to address this problem. Actual physical real-world evidence is required, and the evidence available re heavy lice infestations on recently-migrated smolts suggests the modelling is inaccurate, at best.

## 4. Feed and Feeding

There is no mention in the EIA of the source of feed. Feed on Irish salmon farms is comprised of a large portion of fish from the sprat fishery, conducted by large pair trawlers in inshore bays throughout the autumn and winter months. The Marine Institute states that European sprat is an important species in the trophic web as it links between zooplankton and top predators (fish, birds and marine mammals).

Although sprat is a non-quota species, the most recent scientific advice from ICES recommended a maximum catch of 2,240 tonnes. By contrast, the reported catch by Irish vessels in 2021 was 14,145t, or 6.3 times the suggested maximum catch. This is clearly unsustainable level of fishing, driven by demand from the salmon farm/feed industry. It is removing a vital component of the food chain from all around our coast, impacting on species up and down the food chain. This impacts on commercial inshore fishers also, both through depletion of fish stocks, and the industrial removal of much of the sprat stock, removing a fishing opportunity for smaller, inshore vessels.

While the Minister did attempt to limit sprat fishing and the size of vessels allowed to target them inshore, this was challenged in the courts and struck down for insufficient consultation. That consultation should now recommence without delay with a view to implementing a legally sound policy.

However, the fishery is driven by demand, and this salmon farm will increase that demand exponentially, given its proposed scale. The Minister should not consider the application to be sustainable, given the heavy reliance on over-exploited sprat stocks that he has already seen fit to limit.

## 5. Conclusion

Item1 above summarises the legal and historical context of this site. This application is a flagrant action designed to circumvent due process and the decision of the Minister and ALAB. Natural justice declares that it should not even be considered until due process has been completed. If the decision of the Minister is upheld the farm should be ordered to close immediately.

The Environmental Impact Statement is clearly insufficient, does not properly assess the risks of the project, incorrectly concludes that the risks are sufficiently mitigated, and demonstrates clear bias towards approving the project.

There is already an existing, and grave impact on nearby wild salmon and sea trout populations. This threat should have been addressed by the closure of the farm as ordered by the Minister. However, in the absence of a legal decision, the farm continues to threaten wild stocks, which have suffered continued decline. The application for a farm of vastly increased tonnage would constitute an existential threat to any remaining wild stocks in this part of Kerry, and should be refused on that basis.

The farm will rely on feed sourced from the local food chain, thereby impacting on wild fish, and commercial inshore fishers. The mantra of the aquaculture industry is that they feed the world by replacing wild-caught fish with farmed fish. But if we are just industrially fishing wild fish to feed to farmed fish, that is a false economy, and a self-fulfilling prophecy. Wild stocks continue to decline by industrial over-fishing, driving demand for farmed fish upwards.

To conclude, this application is a flagrant breach of due process and an insult to the Minister and his staff for taking the correct action previously. The proposal itself is oversized, unsustainable and damaging to the environment.

**References**

Thorstad E., Todd C., Uglem I., Bjørn P., Gargan P., Vollset K., Halttunen E., Kålås S., Berg M., Finstad B. (2015)

Effects of salmon lice *Lepeophtheirus salmonis* on wild sea trout *Salmo trutta*—a literature review.

Aquacult Environ Interact Vol. 7: 91–113, 2015 doi: 10.3354/aei00142

Shephard S. & Gargan P. (2021)

Wild Atlantic salmon exposed to sea lice from aquaculture show reduced marine survival and modified response to ocean climate.

*ICES Journal of Marine Science*, Volume 78, Issue 1, January-February 2021, Pages 368–376, https://doi.org/10.1093/icesjms/fsaa079

Marine Institute (2022) SPRAT - Celtic Sea and West of Scotland Sprat (Sub-area 6 and Divisions 7.a-c and f-k). The Stock Book pp. 445-447

[redacted]

[redacted]

[redacted]

[redacted]

To Whom It May Concern

I wish to register my objection to the proposed renewal of a salmon farn licence (application no. T06/202) for a site at Deenish Island, Co. Kerry by Mowi Ireland, through Silver King Seafoods Ltd.

My objection is based on the following grounds:

1. **Previous Record**
   The site in question was the subject of a licence revocation by the Minister in 2019, in response to the flagrant breach of the previous licence conditions, wherein the applicant was found to have harvested more then 1,100 tonnes of salmon in 2016, which was far in excess of the licensed tonnage of 500t.

   Despite the order to close, the salmon farm on the site has continued to operate while the licence revocation was heard by the Aquaculture Licensing Appeals Board (ALAB).

   The decision on that appeal has not yet been made or communicated to the public.

   It is a flagrant breach of due process, and obvious means of circumventing the decision of the Minister, and pending decision of ALAB, to make a fresh application for a new/amended licence. Such an application should not be entertained until the decision of ALAB has been made and any further appeals heard.

   This is akin to a disqualified driver applying for a new licence while disqualified for previous motoring offences. It is, quite simply, an abuse of process and contrary to natural justice. The Minister must recognize this and refuse to consider this application.

   Notwithstanding the point above, I will list other grounds for objection, which in themselves should disqualify this project.

2. **Impact on Wild Salmonids**
   It is well established that sea lice from salmon farms results in increased mortality of wild salmon and sea trout from nearby rivers (Thorstad *et al*, 2015; Shephard & Gargan, 2020). In the case of Deenish Island, the nearby Waterville Fishery (Loughs Currane, Derriana, Namona and Cloonaghlin) is a renowned salmon and sea trout fishery which was previously a thriving tourism angling destination. In recent years, heavy sea lice infestations have resulted in a collapse in sea trout stocks in particular, with salmon numbers also in steep decline. This has coincided with the overstocking of Deenish salmon farm.

   In spite of the negative impacts of a salmon farm ***licensed*** to harvest 500 tonnes annually, and the ***actual*** harvest of more than twice the permitted tonnage, this application seeks to multiply the licensed tonnage to a standing stock biomass (SSB) of

2.200 tonnes. There is no mention of a target harvest, however it is self-evident that a SSB of 2.200 tonnes of salmon on site at any one time means a harvest far in excess of that. This application essentially is for a licence to farm 5-8 times more salmon and is

The revocation by the Minister of the farm licence in 2019 offered a ray of hope for salmon and sea trout in the Waterville area, however the continued operation of the farm in the years since has seen stocks fall even further, and this application for a much increased tonnage of farmed salmon, with consequent massive increase in sea lice levels, will result in the almost certain extinction of wld salmon and sea trout in Lough Currane. This would have serious negative consequences for tourism and employment in Waterville.

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*Sea lice control*

Furthermore, the EIA relies heavily on the assumption that lice numbers will be controlled on this proposed installation. Experience, and the record, shows that it is extremely difficult, if not impossible, to control lice numbers at all times on salmon farms. In recent years, increased sea temperatures have led to massive outbreaks of Amoebic Gill Disease (AGD) and jellyfish blooms, which have caused large mortalities on Irish salmon farms, including those operated by MOWI.

Farmed salmon infected with AGD and/or suffering from jellyfish blooms go off their feed for prolonged periods, which removes the possibility of treating for lice infestations with in-feed pesticides, and results in increased lice levels on farms.

Furthermore, the reliance on cleaner fish as a strategy to remove lice is unsustainable. The wrasse used are taken from the wild in a completely unregulated and unlicensed fishery, used for one growth cycle then killed when the salmon are harvested. These are slow-growing, slow-reproducing fish and many Irish bays are already depleted of wrasse by this fishery. There is no long-term viable sustainable fishery possible for these wrasse, and relying on an uncertain supply is not an acceptable strategy for lice management.

*Theoretical modelling*

The EIA relies heavily on theoretical modelling of lice dispersal to state that lice from the salmon farm will not be an issue. However, lice from the existing farm are already a major issue, with heavy lice infestations on early-returning sea trout smolts a regular feature over the last 10 years in Waterville, and the collapse in sea trout stocks the result.

We are supposed to believe that a farm 5 -8 times the size of the *existing licence* would have no impact, when a serious impact is already evident. Computer modelling is clearly insufficient to address this problem. Actual physical real-world evidence is required, and the evidence available re heavy lice infestations on recently-migrated smolts suggests the modelling is inaccurate, at best.

**4. Feed and Feeding**

There is no mention in the EIA of the source of feed. Feed on Irish salmon farms is comprised of a large portion of fish from the sprat fishery, conducted by large pair trawlers in inshore bays throughout the autumn and winter months. The Marine Institute states that European sprat is an important species in the trophic web as it links between zooplankton and top predators (fish, birds and marine mammals).

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While the Minister did attempt to limit sprat fishing and the size of vessels allowed to target them inshore, this was challenged in the courts and struck down for insufficient consultation. That consultation should now recommence without delay with a view to implementing a legally sound policy.

However, the fishery is driven by demand, and this salmon farm will increase that demand exponentially, given its proposed scale. The Minister should not consider the application to be sustainable, given the heavy reliance on over-exploited sprat stocks that he has already seen fit to limit.

**5. Conclusion**

Item1 above summarises the legal and historical context of this site. This application is a flagrant action designed to circumvent due process and the decision of the Minister and ALAB. Natural justice declares that it should not even be considered until due process has been completed. If the decision of the Minister is upheld the farm should be ordered to close immediately.

The Environmental Impact Statement is clearly insufficient, does not properly assess the risks of the project, incorrectly concludes that the risks are sufficiently mitigated, and demonstrates clear bias towards approving the project.

There is already an existing, and grave impact on nearby wild salmon and sea trout populations. This threat should have been addressed by the closure of the farm as ordered by the Minister. However, in the absence of a legal decision, the farm continues to threaten wild stocks, which have suffered continued decline. The application for a farm of vastly increased tonnage would constitute an existential threat to any remaining wild stocks in this part of Kerry, and should be refused on that basis.

The farm will rely on feed sourced from the local food chain, thereby impacting on wild fish, and commercial inshore fishers. The mantra of the aquaculture industry is that they feed the world by replacing wild-caught fish with farmed fish. But if we are just industrially fishing wild fish to feed to farmed fish, that is a false economy, and a self-fulfilling prophecy. Wild stocks continue to decline by industrial over-fishing, driving demand for farmed fish upwards.

To conclude, this application is a flagrant breach of due process and an insult to the Minister and his staff for taking the correct action previously. The proposal itself is oversized, unsustainable and damaging to the environment.

**References**

Thorstad E., Todd C., Uglem I., Bjørn P., Gargan P., Vollset K., Halttunen E., Kålås S., Berg M., Finstad B. (2015)
Effects of salmon lice *Lepeophtheirus salmonis* on wild sea trout *Salmo trutta*—a literature review.
Aquacult Environ Interact Vol. 7: 91–113, 2015 doi: 10.3354/aei00142

Shephard S. & Gargan P. (2021)
Wild Atlantic salmon exposed to sea lice from aquaculture show reduced marine survival and modified response to ocean climate.
*ICES Journal of Marine Science*, Volume 78, Issue 1, January-February 2021, Pages 368–376, https://doi.org/10.1093/icesjms/fsaa079

Marine Institute (2022) SPRAT - Celtic Sea and West of Scotland Sprat (Sub-area 6 and Divisions 7.a-c and f-k). The Stock Book pp. 445-447



**From:** [redacted]
**Sent:** Monday 12 February 2024 15:58
**To:** FinfishPC
**Subject:** licence Ref:No. T06/202

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Dear Minister McConalogue,

We as a fishing club in South Kerry wish to object to this licence as it was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
When this was revoked we saw this as a sea change and was welcomed.

Fish farming should be more environmentally friendly and follow other countries as mentioned in articles below.

https://www.independent.co.uk/climate-change/news/argentina-salmon-farming-ban-environment-b1880503.html

https://www.fishfarmingexpert.com/chile-smart-aquaculture/21600-tonne-land-based-salmon-farm-planned-in-chile/1513442

Regards,

[redacted]
[redacted] Caragh Bridge Angling Club.

**From:** [redacted]
**Sent:** Monday 12 February 2024 16:02
**To:** FinfishPC
**Subject:** Deenish Island farm renewal application T06/202 attached
**Attachments:** Objection to salmon farm at Deenish Isl.pdf

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Dear Finfish license staff
Pl find comments on the Deenish Island farm renewal application T06/202 attached
Very best
[redacted]

Mr Charlie Mc Conalogue TD
Minister for Agriculture, Food and the Marine
Aquaculture and Foreshore Management Division
National Seafood Centre
Clogheen
Clonakilty Co Cork
Ireland

Coastwatch

Re T06/202 Public Consultation on an Aquaculture Licence and Foreshore Licence Application and Invitation for Public Submissions or Observations on Appropriate Assessment

Dear Minister Mon 12th Feb 2024

Coastwatch is objecting to the 'renewal' of the finfish licence T06/202 on the following grounds:

1. The (lapsed) licence was revoked by Mr Michael Creed TD, the former Minister for Agriculture, Food and the Marine in 2019 for non-compliance with license condition 2e. We cannot find any reference in law to renewal of a licence which no longer exists. Therefore believe the application is not valid.

Nb – while MOWI contested the Minister's power to revoke a lapsed license where the aquaculture operated just continued operation under section 19A4, Ms Justice Baker had confirmed that indeed he has the power

2. Any salmonid aquaculture license application at Deenish Island, right in front of an SAC where protection of wild salmon is one of the site conservation objectives, should be rejected outright on grounds that significant impact on passing wild salmon and seatrout cannot be excluded. This is considering both the poor status of wild salmon for which the site is designated and the risk of sea lice, disease and interbreeding with any escapes from aquaculture pens.

3. As it serves neither industry, nor environment not the public interest to spend a lot of effort and money on applications in areas such as this, we are asking for clear guidelines which state that salmon aquaculture licenses will not be granted near seatrout and salmon rivers, so that our wild stocks have a chance of recovery.

4. Our local Coastwatch group and other eNGOs in west Cork have highlighted their experience and of the Deenish salmon farm as one of repeat sea lice infestations and disease, a devastating loss of wild salmonids and damage to the tourist and angling business around Waterville.

Yours sincerely

[redacted]

[redacted] www.coastwatch.org

[1] https://alab.ie/activeappeals/appealsyearsreceived/appealsreceivedin2019/ap12019/#d.en.189147

In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

As Deenish salmon farm is operating in a Natura 2000 site, it is imperative that the use of antibiotics, toxic pesticides to treat sea lice infestations, antifouling agents and other toxic chemicals are taken into account when determining whether to grant the renewal application or not.

The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al[2].

There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to them, causing

up to 39% mortalities in migrating salmon smolts. The Norwegian Scientific Advisory Committee for Atlantic Salmon conducted a recent study, showing that salmon lice from aquaculture farms are the single largest threat to the future development of sea trout.[3]

Our seas are warming as a result of climate change and mortalities in salmon farms are increasing. Mortalities at the Deenish Island farm, ranging from 25% to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

Furthermore, fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

Wild Atlantic salmon has recently been placed on the Red List of endangered species by the International Union for Conservation of Nature[4]. Although sea trout is not considered endangered, stocks have collapsed in recent years and there are concerns about the impacts of lice infestations.[5] It is your duty to protect the last remaining wild Atlantic salmon and sea trout in Irish waters by refusing the MOWI Deenish licence T06/202 grant/renewal.

Yours sincerely

[redacted]; Asamblea de Mujeres Insulares por las Aguas - Chiloé [redacted]; Ethical Farming Ireland
[redacted]; Feedback
[redacted]; Galway Bay Against Salmon Cages

[redacted]; GSFR
[redacted]; Healthy Bays Network
[redacted]; Ingen Burfisk i Havet
[redacted]; Living Oceans Society
[redacted]; LOWCOau:Leave our Waters Collective Australia [redacted]
[redacted]; Planet Oceans
[redacted]; Rauch Foundation
[redacted]; Slow Food Chile AG
[redacted]; VÁ! In East Iceland
[redacted]; WildFish
[redacted]; Wild Fish Conservancy

[2] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3675643/
[3] https://www.vitenskapsradet.no/Nyheter/threats-to-sea-trout-in-norway
[4] https://www.iucn.org/press-release/202312/freshwater-fish-highlight-escalating-climate-impacts-species-iucn-red-list [5] https://www.fisheriesireland.ie/species/sea-trout-salmo-trutta-trutta

**From:** [redacted]
**Sent:** Monday 12 February 2024 16:16
**To:** FinfishPC
**Subject:** licence Ref:No. T06/202

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Dear Sir /Madam

I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked.

MOWI should not be rewarded for breaking the conditions of their licence.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 16:42
**To:** FinfishPC
**Subject:** Deenish Island Fish Farm License Application T06/202

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From: [redacted]
Address: [redacted]

To: Minister for Agriculture, Food and the Marine, Aquaculture and Foreshore Management Division,
National Seafood Centre, Clogheen, Clonakilty, Co Cork P85TX47
Or email to: FinfishPC@agriculture.gov.ie

**Reference T06/202**
**Aquaculture Licence & Foreshore Licence Application for salmon farm at Deenish Island, Co Kerry**

Dear Minister,
I wish to object to the above licence application for the following reasons:

1 – The salmon farm at Deenish Island was established in the early 1990s and during the years it has operated since then it has severely impacted the nearby wild salmon and sea trout fishery at Waterville. This fishery has been brought to a low ebb due to a combination of sea lice infestation and other diseases emanating from the Deenish salmon farm.

2 – In the years 2004 to 2009, or thereabouts, while there were no salmon in the Deenish farm, the Waterville sea trout fishery staged a recovery. However, the Waterville fishery went into rapid decline again shortly after MOWI purchased the farm and resumed production, in or about 2010.

3 – In direct consequence of the adverse impacts of the Deenish salmon farm the once internationally renowned Waterville fishery has been reduced to a pale shadow of its former glory, evidenced by the strict angling control measures now in place. The hugely valuable angling tourist business, which ran from 17th January to 12th October annually, has been lost to the local economy.

4 – The Natura Impact Statement submitted is inadequate in that it relies on a narrow field of scientific data, such as Jackson et al, which suggests salmon farms have little impact on wild salmonids. There is a much broader and overwhelming field of Irish and International peer reviewed research which indicates the damage caused to wild salmonids by sea lice emanating from salmon farms is substantial and significantly damaging to wild salmonids. We need to lay aside Jackson et al and move to accept the best available scientific advice.

5 – Our seas are warming as a result of climate change and mortalities in salmon farms have been on the increase. Mortalities at the Deenish Island farm, ranging from 25 to almost 40% are unacceptable from an animal welfare standpoint. There is no reason to anticipate water temperatures will fall in the near term to resolve this issue.

6 – The Deenish farm has had a problem with Amoebic Gill Disease which can be passed on to wild salmonids.

7 – Fish farm escapee salmon have been proven to interbreed with wild salmon, thus interfering with the genetics of the wild fish, and reducing survival rates of any offspring.

The history of the Deenish salmon farm is one of sea lice infestation and disease, leading to the devastation of wild salmonids and the loss of most of the tourist angling business at Waterville. Minister, please decline this licence application – remove the farm and you remove the problems.

Signed [redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 16:50
**To:** FinfishPC
**Subject:** SUBMISSION FOR T06-202

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To: Minister for Agriculture Food & the Marine

My name is [redacted] and my address is [redacted]

I would like to submit my concerns and opposition regarding the plans for T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry. [redacted] I have serious concerns regarding the fish farm at Deenish Island, especially the expansion of this facility.

I have read the documents associated with the application for expansion, attended numerous meetings and see a number of concerns as listed below:

1. In the EIA it states that there is no negative impact on local population - this is incorrect and I suspect there was no consultation with the local population in the region, because if there had been they would have input the correct information - this facility has had an influence on the local population of anglers and tourist businesses throughout the region since its installation especially through sea lice infestation on the natural population of salmon and seatrout and reduced natural population meaning the once thriving angling tourism industry has collapsed.

2. Having observed the local Derrynane and Skellig Coast underwater world [redacted] I have seen, particularly in the last fifteen years, an increase in sealice on the skin of Wild inshore fish populations. Examples include pollack, john dory and mullet. I've has seen an increase in fish mortalities attributed to poor health. Having dived on the reefs adjacent to the fish farms I have seen toxic bottom sludges spread into the adjoining areas.

3. Concerns over salmon welfare and mixing with natural population
Lepeophtheirus salmonis and Caligus elongatus sea lice infestations on farms have a direct impact on salmon and sea trout through disease (secondary infection), poor swimming ability thus heightening predator interaction, premature return by seatrout to freshwater to lose lice infestation, poor feeding ability resulting in poor body condition of salmon and sea trout that survive having a knock-on effect through reduced deposition of ova.

Also Amoebic Gill Disease has reached epidemic proportions at Deenish and other sites. This can be passed to wild salmonids and we all know escapees can be a problem which reduce genetic fitness of wild salmon.

Debris from the fish farm are periodically found on our local beaches and the last such incident at Derrynane, two years ago took us 6 days to clear, when a very large buoy, broke apart and sent hundreds of thousands of polystyrene beads into the water and across rocks and rock pools at Lambs head.

I am also concerned about the welfare of extremely high mortality figures approaching 46% at Deenish. Climate change with increased temperature fuels invasion of jellyfish, harmful algal blooms and also accelerates sea lice production. No place for open cage farming.

Fish farm food overspill feeding native populations of fish and other marine organisms non natural sources of food in the wild

4. Pair trawling by vessels over 18m in our small enclosed bay at Kenmare is taking sprat biomass out of the ecosystem, which in turn is being converted into salmon pellets. This also affect seabirds, marine mammals and the viability of our local inshore fleet.

5. Concerns regarding legal obligations of the Irish government to meet EU HABITATS DIRECTIVE/ NATURE RESTORATION LAWS
Deenish island is a well known area to see seals, risso's dolphins, common dolphins, porpoise and bottlenose dolphins, of which all are protected on the EU Habitats Directive, the installation could create disturbance to these cetaceans due to noise, anchor chains and traffic to the area. We know that MOWI (locally known as Silver King Seafoods Ltd.) have been found to use pingers and other Acoustic deterrent devices (ADD's) to a detrimental level in Scotland. How can we be assured this will not happen in this marine biodiverse region? MOWI mentioned in this documentary for over use of ADD's in Scotland to deter seals,,, and not reporting properly on use of them from around minute 12: https://youtu.be/YwRwkiQckCk?si=GJwBiysLWhKj_so5
In the EIA, looking at the images from beneath the fish farm and proximity it is clear there is a layer of sludge from the intense salmon discharge and food that may drop to the seafloor, which will turn or may have already turned the area beneath the fish farm anoxic and potentially toxic for any biodiversity that may normally inhabit this area - not in line with the Nature Restoration Law
Having an open pen salmon farm in such a rich marine biodiverse area, (SAC, NHA and more recently recognised globally for its contribution to international marine biodiversity with the Greater Skellig Coast Hope Spot designation) really goes against the Nature Restoration Law if we are already seeing detrimental effects to local fish populations and potential to impact the endangered Pearl Mussel which is found in the local salmon rivers.
An Inland Fisheries Study on fish farm proximity to salmon and seatrout rivers has shown the detrimental effects of fish farms https://www.irishexaminer.com/opinion/columnists/arid-20438374.html again this would go against the EU Habitats Directive and Nature Restoration Law if this development was allowed in an SAC
MOWI A.K.A Silver King Seafoods Ltd is currently in an EU courtcase for farmed Atlantic salmon cartel case which does not bode well or instil trust in the company operating according to EU regulations in a highly sensitive biodverse rural
region https://ec.europa.eu/commission/presscorner/detail/en/ip_24_405

Other general concerns:
Every year debris from the fish farm ends up on local beaches.

Accessibility to a safe harbour will be cut off by the new layout of pens obstructing Deenish Island Bay.

With the obstruction to the bay and increased fish loads this may alter the natural habitat of this bay in an SAC.

With the obstruction to the bay local recreational boat users and sea fishers will not be able to access the sheltered waters of Deenish Bay.

There have been many studies reports and documentaries on how unsustainable and dangerous fish farms are, do we really want to be complicit in furthering this industry which is detrimental to our native species and marine biodiversity.

Finally, aesthetics [redacted]. I constantly have to explain what these open pens are.

I hope that you will take these concerns into consideration when evaluating Silver King Seafoods Ltd application to expand at Deenish Island.

Yours etc
[redacted]

--

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 17:02
**To:** FinfishPC
**Subject:** T06/202[redacted]

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Sent from my iPhone

**From:** [redacted]
**Date:** 12 February 2024 at 16:41:38 GMT
**To:** [redacted]
**Subject: Fwd: T06/202 Submission**

Dear Minister for Fisheries,

I have just been made aware of Silver Kings Seafood application to increase size of operation at Deenish Island. This is an area of outstanding natural beauty [redacted] I have been made aware of concerns with regard to the existing operation and of its effect on the local area by a marine biologist who has expressed [redacted] concerns about this. Whilst I do not have expertise in the area of fish farms I am guided by the concerns of a marine biologist who has raised the following concerns.

1. In the EIA it states that there is **no negative impact on local population** - this is incorrect and I suspect there was no consultation with the local population in the region, because if there had been they would have input the correct information - this facility has had an influence on the local population of anglers and tourist businesses in the Waterville region since its installation especially through the sea lice infestation on the natural population of salmon and seatrout and reduced natural population meaning the once thriving lake tourism industry has flopped with a domino effect to the whole village and region regarding economy.

2. Concerns over salmon welfare and mixing with natural population

- Lepeophtheirus salmonis and Caligus elongatus sea lice infestations on farms have a direct impact on salmon and sea trout through disease (secondary infection), poor swimming ability thus heightening predator

interaction, premature return by seatrout to freshwater to lose lice infestation, poor feeding ability resulting in poor body condition of salmon and sea trout that survive having a knock-on effect through reduced deposition of ova.

- Also Amoebic Gill Disease has reached epidemic proportions at Deenish and other sites. This can be passed to wild salmonids and we all know escapees can be a problem which reduce genetic fitness of wild salmon.
- Debris from the fish farm are periodically found on local beaches which makes one think that pens have broken up or been damaged during a storm - with increased extreme weather events this may become a bigger issue and there could be more potential for escapees
- welfare concerns as Deenish has extremely high mortality figures approaching 46%. Climate change with increased temperature fuels invasion of jellyfish, harmful algal blooms and also accelerates sea lice production. No place for open cage farming.
- Fish farm food overspill feeding native populations of fish and other marine organisms non natural sources of food in the wild

3. Concerns regarding legal obligations of the Irish government to meet EU HABITATS DIRECTIVE/ NATURE RESTORATION LAWS

- Deenish island is a well known area to see seals, risso's dolphins, common dolphins, porpoise and bottlenose dolphins, of which all are protected on the EU Habitats Directive, the installation could create disturbance to these cetaceans due to noise, anchor chains and traffic to the area. We know that MOWI (locally known as Silver King Seafoods Ltd.) have been found to use pingers and other Acoustic deterrent devices (ADD's) to a detrimental level in Scotland. How can we be assured this will not happen in this marine biodiverse region? MOWI mentioned in this documentary for over use of ADD's in Scotland to deter seals,,, and not reporting properly on use of them from around minute 12: https://youtu.be/YwRwkiQckCk?si=GJwBiysLWhKj_so5
- In the EIA, looking at the images from beneath the fish farm and proximity it is clear there is a layer of sludge from

the intense salmon discharge and food that may drop to the seafloor, which will turn or may have already turned the area beneath the fish farm anoxic and potentially toxic for any biodiversity that may normally inhabit this area - not in line with the Nature Restoration Law

- Having an open pen salmon farm in such a rich marine biodiverse area, (SAC, NHA and more recently recognised globally for its contribution to international marine biodiversity with the Greater Skellig Coast Hope Spot designation) really goes against the Nature Restoration Law if we are already seeing detrimental effects to local fish populations and potential to impact the endangered Pearl Mussel which is found in the local salmon rivers.
- An Inland Fisheries Study on fish farm proximity to salmon and seatrout rivers has shown the detrimental effects of fish farms https://www.irishexaminer.com/opinion/columnists/arid-20438374.html again this would go against the EU Habitats Directive and Nature Restoration Law if this development was allowed in an SAC
- MOWI A.K.A Silver King Seafoods Ltd is currently in an EU courtcase for farmed Atlantic salmon cartel case which does not bode well or instil trust in the company operating according to EU regulations in a highly sensitive biodverse rural region https://ec.europa.eu/commission/presscorner/detail/en/ip_24_405

Other general concerns:

- Every year debris from the fish farm ends up on local beaches
- Accessibility to a safe harbour will be cut off by the new layout of pens obstructing Deenish Island Bay
- With the obstruction to the bay and increased fish loads this may alter the natural habitat of this bay in an SAC
- With the obstruction to the bay local recreational boat users and sea fishers will not be able to access the sheltered waters of Deenish Bay
- 
- There have been many studies reports and documentaries on how unsustainable and dangerous fish farms are, do we really want to be complicit in furthering this industry which is detrimental to our native species and marine biodiversity.
- Finally, aesthetics [redacted] often asked what the circles are near the island when stopped at the viewpoint overlooking Derrynane, Deenish, Scarriff and Atlantic ocean, we tell them it's a fish farm and most often the tourists are upset

to know that we have such an unsustainable industry in our pristine corner of Ireland.

I hope that you will take these concerns into consideration when evaluating Silver King Seafoods Ltd application to expand at Deenish Island.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 17:04
**To:** FinfishPC
**Subject:** The Minister for Agriculture, Food and the Marine. T06/202

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Hi "I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.

Signed,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 17:14
**To:** FinfishPC
**Subject:** Ref No T06/202

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Ref:No. I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
Signed [redacted]
[redacted]

Sent from Outlook for Android

**From:** [redacted]
**Sent:** Monday 12 February 2024 18:15
**To:** FinfishPC
**Subject:** Proposed Salmon Farm Deenish Island

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[redacted]

12th February 2024

Dear Minister

I am writing to express my deep concern for the impacts on local marine and freshwater ecosystems as a direct result of re-licensing open cage salmon farming off Deenish Island County Kerry. Cage rearing of salmon directly pollutes the marine environment and relies on unsustainable industrial fishing to provide fish meal and oil for the fishes diet. Vast quantities of toxic compounds are tipped into the sea to try and control sea lice infestations in the farmed stock. Sea lice populations in local waters rocket,

infecting the wild fish. The links between coastal, cage reared salmon farming and the local collapse of migratory salmonid populations is unequivocally proven. Indeed, Inland Fisheries Ireland's own scientist has published data highlighting this issue.

The Lough Currane sea trout population is very special, genetically unique (containing *ferox* genes) and both ecologically and economically of critical value to the local community. This subspecies of trout should be protected in its own right. Given the evidence, it is baffling to think that there is even the remotest chance that the Irish Government would give this application the light of day. The Kerry migratory salmonid population brings wide ranging benefits to the Irish economy and must be protected. Damage has been done but the fishery can recover with sustainable management, and we urge the Minister to rule out any resumption of open cage salmon farming in the Deenish Island vicinity to ensure that a full recovery in the Lough Currane sea trout and salmon population is possible.

The Currane system and Kerry Blackwater are home to populations of otter and freshwater pearl mussels, both being protected as individual species and existing within a local network of sites covered by SACs. The pearl mussel is 'critically endangered' and it is an offence to disturb it or damage its habitat. The mussels rely on juvenile salmon and sea trout to spawn succesfully as they are an intermediate host for the species. Anything that reduces the numbers of salmon and sea trout (such as this proposal) in the rivers will directly damage mussel populations, so is illegal within the Habitats Directive.

I urge you not to re-licence this damaging and unsustainable activity.

Yours sincerely,

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 21:01
**To:** FinfishPC
**Subject:** Deenish Island T06 202

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To:
Department of Agriculture and Fisheries.
Reference: T06 202.

Re-: Public Consultation on proposed establishment of a salmon fish farm at Deenish Island near Waterville in County Kerry.

I thank the Minister for the opportunity to make a submission on this important matter. This is a submission from an ordinary member of the public.

I would like to raise the following points:

The company running the fish farm breached the conditions of their licence and had their licence withdrawn by you. Despite this there are now seeking a new licence with a greatly increased production of fish.

Despite the withdrawal of the licence the company has continued to operate the farm. Does this suggest that the company has any intention of following regulations from your department in the future?

I know that freshwater fishing has been badly affected in the area and many visitors no longer go there. Other people have been economically disadvantaged from the loss of tourism income. Has the company addressed this issue, or does it propose to make any restitution to those people who have been adversely affected?

There are alternative methods of fish farming now available with less environmental impacts. Has the company addressed this question? It appears that the technology of open nets in the sea is outdated and has many downsides from the point of view of disease and escape of fish because nets get damaged in storms.

I believe that this fish farm is in the wrong place, it is using an old system of open cage management which is been superseded, and the record of the companies activity with this farm and non-adherence to the terms of their licence should lead the Minister to refuse permission for this development.

[redacted]

**From:** [redacted]
**Sent:** Monday 12 February 2024 21:16
**To:** FinfishPC
**Subject:** T06-202 Silver King Seafoods Ltd Aquaculture/Foreshore Licence application, east of Deenish Island, Co. Kerry

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Dear Minister,
I am writing to express my sheer bewilderment and dismay that once again our endangered native wild salmonid species, namely Atlantic salmon and Sea Trout, are facing the final nail in their coffin, their inevitable extinction in the Waterville system and other river systems in Kerry, if this salmon farm is given permission off Deanish Island.

That a once famous recreational Salmon and Sea trout fishery, Lough Currane, which brought in a large amount of tourism revenue to the local economy, could be sacrificed to fill the pockets of a vast multinational, MOWI, that brings little return to the area, is frankly disgraceful.

In an age when we are called to be environmentally aware, giving MOWI and its subsidiaries a licence, with their appalling track record, is ridiculous.

The scientific data is there to highlight the damaging effects of this form of aquaculture, despite the Marine Institute being seemingly unable to grasp the truth.

I implore you to turn down this application, for the sake of our natural heritage.

Yours sincerely,
[redacted]

From: [redacted]
Sent: Monday, February 12, 2024 12:45 PM
To: FinfishPC <FinfishPC@agriculture.gov.ie>
Subject: Ref:No. T06/202.

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

>
> I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.
> Signed,
[redacted]

Sent from my iPhone

**From:** Elaine McGoff <elaine.mcgoff@antaisce.org>
**Sent:** Monday 12 February 2024 16:51
**To:** FinfishSC
**Subject:** An Taisce submission T06/202.
**Attachments:** An Taisce submission T06-202.pdf

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

A Chara,
Please find attached An Taisce's submission on the Deenish Salmon farm, reference number T06/202.

Please confirm receipt,

Le meas,
Elaine McGoff

An Taisce
The National Trust for Ireland
5 Foster Place
Dublin 2, Ireland
D02 V0P9

Marine Finfish Unit Aquaculture and Foreshore Management Division

Department of Agriculture, Food and Marine

National Seafood Centre

Clonakilty

Co. Cork

P85 TX47

**sent by email to:** FinfishSC@agriculture.gov.ie

12th February 2024

**Submission pursuant to Section 11 of the Aquaculture (Licence Application) Regulations, 1998 (SI No 236 of 1998).**

**Reference T06/202**

A Chara,

Thank you for referring this notification to An Taisce in accordance with Section 11 of the Aquaculture (Licence Application) Regulations, 1998 (SI No 236 of 1998). An Taisce has reviewed the application for a renewal of a Salmon Farm Aquaculture Licence at Deenish Island, Co. Kerry. Reference: T06/202. We would like to raise the following issues.

## 1. Preliminary issues - renewal application

At the outset, we would highlight that it is our understanding that this licence is not a renewal, it should rather be classified as a new licence. We understand that in 2019 the Minister of Agriculture at that time revoked the licence which was provided to Silver King Seafoods Limited, trading as Mowi Ireland, as a result of an alleged gross overstocking of the salmon farm. The Minister wrote[1] to Mowi Ireland on the 12th April 2019 to inform them of the revocation, and to specifically highlight that Section 19(A)(4) of the regulations did not apply. It is our understanding that Mowi has continued to operate the salmon farm since, and has

[1] AP1-2019 - DAFM File Combined.pdf (alab.ie)

appealed the decision of the Minister to ALAB, as they are entitled to under section 40 of the Fisheries Amendment Act (1997) (as amended).

We note, under Section 40(4)(C) of the Fisheries Act, in relation to a revocation of a licence, ALAB has the power to substitute its decision for that of the Minister's:

*"(4) Where an appeal is brought under this section and is not withdrawn, the Board shall, subject to subsection (5), determine the appeal by—*

*(C) in relation to the revocation or amendment of a licence, substituting its decision on the matter for that of the Minister."*

It appears to us that Section 19(A)(4), whereby an applicant with an expired licence can continue to operate pending the renewal of their licence application, only applies in the instance that a licence has lapsed. There is no mention of this provision applying in the current case, whereby a licence has been revoked and an appeal taken. Section 19A copied in full below:

> *"19A.— (1) The power of the licensing authority to renew or to further renew an aquaculture licence under section 19 is exercisable notwithstanding the expiration of the period for which the licence was granted or renewed.*
>
> *(2) Where, prior to the passing of the Sea-Fisheries and Maritime Jurisdiction Act 2006, an aquaculture licence has been renewed or further renewed after the expiration of the period for which the licence was granted or renewed, such renewal shall be and be deemed always to have been as valid and effectual as if the licence had been renewed or further renewed on the expiration of the period in question*
>
> *(3) If, because of the validation expressed to be effected by subsection (2), that subsection would, but for this subsection, conflict with a constitutional right of any person, the validation shall be subject to such limitation as is necessary to secure that it does not so conflict but shall be otherwise of full force and effect.*
>
> *(4)* ***A licensee who has applied for the renewal or further renewal of an aquaculture licence shall, notwithstanding the expiration of the period for which the licence was granted or renewed but subject otherwise to the terms and conditions of the licence, be entitled to continue the aquaculture or operations in relation to aquaculture authorised by the licence pending the decision on the said application."*** **[our emphasis]**

As such, it is our view that this licence has been incorrectly classified as a renewal application, instead of a new licence application. Pending the outcome of ALAB, the Minister's decision stands, and it appears to us that that means there is no extant licence for this farm, and no existing lawful right to continue operating under Section 19(A)(4) of the Fisheries Act. Any operations on this farm from 2019 onwards would appear to be unlicenced in the eyes of the law. As such, we submit that this renewal licence application is invalid.

## 2. Obligation to Remedy

Notwithstanding our comments on the validity of the application being a renewal, it is An Taisce's position that any grant of Licence for this site would be contrary to EU law. This is arising from the remedial obligation placed on State authorities to undo the unlawful consequences of a breach of EU law, in this case the EIA and Habitats Directives.

The Fisheries (Amendment) Act 1997 (as amended) under which this Licence application is to be determined, does not give effect to the decision of the Court of Justice in Case C-215/06 *Commission v Ireland*, which concerned the then provisions of the Planning and Development Act 2000 (as amended) and how under said provisions it was possible to grant retention planning permission for development which had been carried out in breach of EU law. Following the decision of the Court of Justice in that case, Part XA of the 2000 Act was introduced to provide for the system of what is known as 'Substitute Consent', whereby development regulated under the 2000 Act, but which has been carried out in breach of the EIA and Habitats Directives, can apply for a form of planning permission which includes remedial environmental assessments.

An Taisce notes that the 1997 Act was not amended to give effect to the decision of the Court of Justice in Case C-215/06 to provide for an equivalent system for the regularisation of aquaculture operations.

It is An Taisce's position that a decision to grant a Licence in this case would be unlawful, having regard to the material which is before the Minister concerning the failure of Silver King Seafoods, trading as Mowi Ireland, to comply with the terms of their existing Licence, as well as a failure to carry out the relevant assessments of environmental impact of the fish farming already carried out in contravention of EU law. Furthermore, the failure of the State to give proper effect to EU law in the field of aquaculture licencing does not absolve the State from its duty to comply with EU law in relation to a new application before the Minister, where the original Licence and the activity which it purported to regulate has been carried out to date in breach of EU law.

In that regard, and notwithstanding that the 1997 Act has not been amended to give effect to the decision in Case C-215/06, there is an autonomous obligation on the Minister to give effect to EU law in determining this licence application.

We refer the Minister to the decision of the Court of Justice in Case -378/17 *The Minister for Justice and Equality and The Commissioner of An Garda Síochána and the Workplace Relations Commission,* where the Court ruled that the duty to apply EU law extends not only to national courts but to all other organs of the State called upon in carrying out their functions to apply EU law. This includes the Minister in his role in relation to assessing this licence application before it. The Court held at para:

> *"As the Court has repeatedly held, that duty to disapply national legislation that is contrary to EU law is owed not only by national courts, but also by all organs of the State — including administrative authorities — called upon, within the exercise of their respective powers, to apply EU law (see, to that effect, judgments of 22 June 1989, Costanzo, 103/88, EU:C:1989:256, paragraph 31; of 9 September 2003, CIF, C-198/01, EU:C:2003:430, paragraph 49; of 12 January 2010, Petersen, C-341/08,*

*EU:C:2010:4, paragraph 80; and of 14 September 2017, The Trustees of the BT Pension Scheme, C-628/15, EU:C:2017:687, paragraph 54).*

*It follows that the principle of primacy of EU law requires not only the courts but all the bodies of the Member States to give full effect to EU rule"*

The Court found that the effectiveness of EU law, in that case employment law, would be undermined if authorities called upon to comply with EU law could not of their own motion disapply conflicting provisions of national law. The fact that in Ireland someone may have recourse to Judicial Review to challenge the legality of a decision taken contrary to EU law does not absolve the primary decision maker from their obligation to comply with EU law. The Court held at para 50:

*"It follows from the principle of primacy of EU law, as interpreted by the Court in the case-law referred to in paragraphs 35 to 38 of the present judgment, that bodies called upon, within the exercise of their respective powers, to apply EU law are obliged to adopt all the measures necessary to ensure that EU law is fully effective, disapplying if need be any national provisions or national case-law that are contrary to EU law. This means that those bodies, in order to ensure that EU law is fully effective, must neither request nor await the prior setting aside of such a provision or such case-law by legislative or other constitutional means.*

*Consequently, the fact, highlighted by the referring court, that in the present instance national law permits individuals to bring an action before the High Court founded on the alleged incompatibility of a national provision with Directive 2000/78 and allows the High Court, if it upholds the action, to disapply the national provision at issue is not capable of calling the above conclusion into question.*

*In the light of the foregoing considerations, the answer to the question referred is that EU law, in particular the principle of primacy of EU law, must be interpreted as precluding national legislation, such as that at issue in the main proceedings, under which a national body established by law in order to ensure enforcement of EU law in a particular area lacks jurisdiction to decide to disapply a rule of national law that is contrary to EU law."*

Accordingly, An Taisce submits that there is an obligation on the Minister to comply with the EU jurisprudence in Case C-215/06 and the other caselaw which will be referred to below. The Minister must read into the 1997 Act the requirement to give effect to that caselaw, and if necessary disapply any conflicting provisions of the 1997 Act.

We will set out below in more detail, An Taisce's position as to how the grant of a Licence in this case would be contrary to EU law. In that regard, first of all it is clear that the failure of Silver King Seafoods to comply with their licence was 'significant'. At section 18 of the internal Departmental submission to the Minister prior to withdrawing the Licence in 2019, the breach of the licence identified was described as 'a very significant breach'.

Furthermore, the submission from Inland Fisheries Ireland of 7 June 2019 stated that the Deenish Island fish farm during the period in which it was in breach of its Licence there had been a significant decline in sea trout numbers on the Curran fishery. Concerns were

expressed as to the impact that the fish farm was having on the SAC designed for Atlantic salmon.

Silver King Seafoods were granted the previous Licence on the basis of environmental assessments. However, it is clear that those assessments were not in compliance with EU law, and that consequently the subsequent fish farming was carried out in breach of EU law.

Furthermore, the Licence limited the production of salmon to 500 tonnes per annum, based on the (presumed) absorption capacity of the marine environment for the waste produced by the salmon farm. However, Silverking Seafoods were found to be producing more than 120% of their allowable production of salmon, and therefore presumably the equivalent in terms of emissions of waste to the marine environment.

The Licence application is expressed to be a renewal to the existing licence. It is clear therefore that this is an application for a renewal of a licence, in circumstances where the original licence has been carried out in breach of the EIA and Habitats Directives, in that the effects on the environment arising from the production of significantly more waste than was permitted have not been assessed in accordance with those Directives as required.

There is no material supplied by the proposed Licensee in the EIAR and the Natura Impact Statement which provides the necessary information on the environmental effects of the fish farm when it was being carried out in contravention of EU law.

Neither the EIA Directive nor the Habitats Directive specify what action should be taken in the event of infringement of the obligations laid down by those directives. However, in Case C-201/02 *Wells*, the Court of Justice found that where there was a failure to conduct an EIA there was an obligation on the State authorities to revoke or suspend a consent. This obligation falls upon all organs of the Member State. The Court held:

> *"It is clear from settled case-law that under the principle of cooperation in good faith laid down in Article 10 EC the Member States are required to nullify the unlawful consequences of a breach of Community law (see, in particular, Case 6/60 Humblet [1960] ECR 559, at 569, and Joined Cases C-6/90 and C-9/90 Francovich and Others [1991] ECR I-5357, paragraph 36). Such an obligation is owed, within the sphere of its competence, by every organ of the Member State concerned (see, to this effect, Case C-8/88 Germany v Commission [1990] ECR I-2321, paragraph 13).*

*Thus, it is for the competent authorities of a Member State to take, within the sphere of their competence, all the general or particular measures necessary to ensure that projects are examined in order to determine whether they are likely to have significant effects on the environment and, if so, to ensure that they are subject to an impact assessment (see, to this effect, Case C-72/95 Kraaijeveld and Others [1996] ECR I-5403, paragraph 61, and WWF and Others, cited above, paragraph 70). Such particular measures include, subject to the limits laid down by the principle of procedural autonomy of the Member States, the revocation or suspension of a consent already granted, in order to carry out an assessment of the environmental effects of the project in question as provided for by Directive 85/337."*

In C-196/16*, Comune di Corridonia and Others,* the Court of Justice held that EU law does not preclude national rules which, in certain cases, permit the regularisation of operations or

measures which are unlawful in the light of EU law. However, such a possible regularisation would have to be subject to the condition that it does not offer the parties concerned the opportunity to circumvent the rules of EU law or to refrain from applying them, and should remain the exception. The Court held:

> *"In the event of failure to carry out an environmental impact assessment required under Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment, EU law, on the one hand, requires Member States to nullify the unlawful consequences of that failure and, on the other hand, does not preclude regularisation through the conducting of an impact assessment, after the plant concerned has been constructed and has entered into operation, on condition that:*
>
> - *national rules allowing for that regularisation do not provide the parties concerned with an opportunity to circumvent the rules of EU law or to dispense with applying them, and*
> - *an assessment carried out for regularisation purposes is not conducted solely in respect of the plant's future environmental impact, but must also take into account its environmental impact from the time of its completion."*

In C-411/17 *Inter-Environnement Wallonie and Bond Beter Leefmilieu Vlaanderen* the Court of Justice held that such regularisation permitted under the EIA Directive also applies in relation to the Habitats Directive:

> *"By analogy, it must be held that EU law does not preclude such regularisation, subject to the same conditions, in the event of failure to conduct a prior impact assessment of the effects of the project concerned on a protected site, as required by Article 6(3) of the Habitats Directive."*

It is clear that legal consequences flow from the decision of the Minister to discontinue the statutory entitlement of Silver King Seafoods to carry out aquaculture operations in 2019. As the Court of Justice found in Case C-278/21 *AquaPri,* which was a Danish case involving a fish farm which had been authorised on foot of an Appropriate Assessment which was not in compliance with the Habitats Directive:

> *"In the second place, it must nevertheless be observed that, since the Member States are required to comply with Article 6(3) of Directive 92/43 and, more specifically, the assessment obligation laid down in the first sentence of that provision, it cannot be accepted that a legal consequence may not be drawn from the infringement of that obligation in the event that such an infringement is found, in a final decision, by the competent national authority or court.*
>
> *On the contrary, as the Court has stated with regard to the similar assessment obligation established by Directive 85/337, even where the authorisation of a project which has been adopted in breach of that obligation is definitive, that project cannot, however, be regarded as having been lawfully authorised with regard to that obligation, such that the Member State concerned is required, under the principle of*

*sincere cooperation provided for in Article 4(3) TEU, to eliminate the unlawful consequences of the breach which it has committed by taking all measures necessary within the sphere of its competence to remedy it (see, to that effect, judgment of 12 November 2019, Commission v Ireland (Derrybrien Wind Farm), C-261/18, EU:C:2019:955, paragraphs 71, 75, 80 and 90 and the case-law cited).*

*In particular, as the Advocate General noted, in essence, in points 29 and 30 of her Opinion, where a project has been authorised following an assessment which does not comply with the requirements of the first sentence of Article 6(3) of Directive 92/43, the competent national authority must carry out a subsequent review of the effects of the implementation of that project on the site concerned, on the basis of Article 6(2) of that directive, if that review constitutes the only appropriate measure for avoiding that implementation from leading to deterioration or disturbance that could have had a significant effect on the site concerned. (see, to this effect, judgment of 14 January 2016, Grüne Liga Sachsenand Others, C-399/14 EU:C:2016:10, paragraph 46).*

*However, such a subsequent review, based on Article 6(2) of Directive 92/43, is not the only appropriate measure that the competent national authority may, in a situation such as that at issue in the main proceedings, be called upon to adopt.*

*In fact, as is apparent from the case-law of the Court, EU law does not preclude that authority from revoking or suspending the authorisation already granted in order to carry out a new assessment in accordance with the applicable requirements, provided that those measures take place within a reasonable period of time and that account is taken of the extent to which the person concerned may have been able to rely on the lawfulness of that authorisation, or even, in certain exceptional cases provided for by the applicable rules of national law, for the authority to regularise the situation, which must then not only comply with those requirements, but also take place under conditions which exclude any risk of circumvention or non-application of the rules of EU law (see, to that effect, judgment of 12 November 2019, Commission v Ireland (Derrybrien Wind Farm), C-261/18, EU:C:2019:955, paragraphs 75 to 77 and 92 and the case-law cited).″*

It is noted that the Licence applied for by Silver King Seafoods is not a mere continuation of the Licence which it currently holds. The proposed Licence provides for increased production at the site, and therefore the operation conditions are changed. However, the fact that the Licence application has been made, now poses according to the decision of the Court of Justice in *AquaPri,* concurrent obligations on the Minister under both Article 6(2) and 6(3) of the Habitats Directive. Commenting on the decision in *AquaPri,* Braaksma and Haugsted stated in *Unlawfully Authorised Projects under the Habitats Directive: Remediation at All Costs?, Comment on the CJEU Judgment of 10 November 2022 in Case C-278/21 AquaPri*", Journal for European Environmental & Planning Law 20(1), 95-113:

*"That an unlawful authorisation has become final does not mean, however, that the project concerned can be regarded as having been lawfully authorised under Article 6(3). The obligation on the national authorities to remedy the failure to carry out an assessment does not go away as a result of the finality of the permit. Instead, it remains a contingent liability for the national authorities. As the Court pointed out in*

*AquaPri, this means that if a national authority gets the opportunity to rectify the failure to carry out an appropriate assessment in the context of a later consent procedure, the authority is obliged to do so. Or as the Court put it: 'where a Member State has provided, either in a measure of general scope, or in a measure of individual scope, that the continuation of an activity already authorised must be the subject of a new authorisation, the competent national authority is required to make that authorisation subject to a new assessment in accordance with the requirements of the first sentence of Article 6(3), where it appears that that activity has not yet been the subject of such a compliant assessment.*

*This was the case in the main proceedings in AquaPri. As required by Danish legislation as well as the 2006 permit, the fish farm concerned was required to apply for a new authorisation, by the latest in 2014. Before granting this new authorisation, the Danish authorities were therefore obliged to carry out an appropriate assessment even though the mere continuation of the activity under unchanged conditions did not constitute a 'project' within the meaning of Article 6(3). As is apparent, this remediation measure is also dependent on national law which has to provide for the renewal or reconsideration of existing permits. However, it is not unthinkable that the duty to rectify a failure to carry out an assessment at a later stage might also 'awake' under other circumstances than in AquaPri. This could, for example, be the case if the operator wishes to make amendments to the existing project requiring approval."*

The High Court recently per Mr Justice Humphreys found in *Carrownagowan Concern Group and Ors v An Bord Pleanála [2023] IEHC 579,* summarised *AquaPri* at para 92:

*"Thus, if EU law assessments were not carried out properly in relation to an original permission, and the developer (or someone benefitting from a previous consent) seeks an extension of the consent, or an amendment of it, the remedial obligation may have the consequence that the body giving consent to such subsequent application is obliged to rectify the failure to conduct a correct assessment originally. If such rectification is not put in place, then a given applicant can challenge the subsequent consent on that basis. This does not extend to a retrospective challenge to the original consent."*

The Court found that it was necessary at least in respect of judicial review proceedings taken under the Planning and Development Act 2000 alleging a failure of a competent authority to comply with the remedial obligation under EU law, for the applicant to have raised the issue of the requirement to carry out a remedial environmental assessment with the relevant competent authority prior to raising that point in subsequent judicial review proceedings.

For the avoidance of doubt, An Taisce is hereby raising with the Minister the obligation to carry out a remedial environmental assessment of the Silver King operations at Deenish Island, prior to the granting of any Licence to continue aquaculture operations.

It is however, An Taisce's position that the Licence must in fact be refused, as Silver King Seafoods have not submitted the relevant information to address the impacts of their aquaculture operations at Deenish Island which have been carried out in breach of the EIA

and Habitats Directives. The only course of action, An Taisce submits, which is lawfully open to the Minister in this case, is to reject the application for the Licence.

## 3. Sea Lice Impacts

The potential impact of sea lice infestation for wild salmonids is discounted thus in the NIS:

> *"The continuous weekly monitoring as well as coordinated treatment of all licenced sites within the bay through the Single Bay Management (see Section 2.1.16 for further details) plan once trigger levels have been breached is imperative to minimise any potential risk on wild salmonids. Consequently, it can be concluded that the proposed operations at the site are unlikely to result in significant impact in sea lice infestations in wild salmon populations; consequently there will be no likely significant direct effects to the Qualifying Feature salmon and no likely significant indirect effects to the Qualifying Feature freshwater pearl mussel"*

While the NIS provides a modelling exercise for lice, we would note that the operators of this plant are alleged to have previously stocked the farm at 122% of what they were licenced for, and, short of a change in approach in terms of monitoring and enforcement of the stocking density for this operator, then the licencing authority cannot be confident that the limit will be respected. That, in turn, raises reasonable scientific doubt as to the infection potential of the farm. We submit that this is a significant uncertainty, and given the alleged track record of the applicant, unless far stricter inspection and enforcement is guaranteed then the scientific doubt remains, in conflict with Article 6(3) of the Habitats Directive.

Additionally, anecdotal evidence from the very reputable Inland Fisheries Ireland indicates that there are serious concerns in regard to the impact of the salmon farm on wild trout and salmon. Inland Fisheries Ireland clearly outlined in their 2019 submission to ALAB[2], in regard to the revocation of the Mowi licence, how with an increase in the number of salmon being reared at the Deenish salmon farm there was a corresponding dramatic decline in Sea Trout numbers, as a result of sea lice infestation from the Deenish Salmon Farm. They made their concerns regarding the salmon farm very clear, and clearly welcomed the revocation of the licence.

Furthermore, we note that Mowi seeks to rely on a study from 2013 (Jackson et al., 2013), which downplays the overall impact of lice on wild salmon. However, there have been clear examples of lice infestation of wild salmonids as a result of farmed salmon, and the international literature is testament to that. Specifically, in the Irish context, a study by Shephard and Gargan (2020)[3] shows that salmon returns on five rivers on the West coast between 1990 and 2019 dropped by between 19% and 46% in the years following high lice

[2] Submission from Inland Fisheries Ireland 7-6-19_Redacted.pdf (alab.ie)

[3] Shephard and Gargan (2020). Wild Atlantic salmon exposed to sea lice from aquaculture show reduced marine survival and modified response to ocean climate. ICES Journal of Marine Science, Volume 78, Issue 1, January-February 2021, Pages 368–376, https://doi.org/10.1093/icesjms/fsaa079

levels on nearby salmon farms. Similarly, a previous study by Shephard and Gargan (2017)[4] demonstrated a 50% decrease in the salmon run largely attributable to lice infestation on farmed salmon. In a similar piece of work, highlighted by IFI, an extensive review by Thorstad et al (2015) assessed the impacts of the salmon louse on sea trout. They concluded that 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.

Given the anecdotal evidence of a collapse in the local salmonid population, which coincides with an increase in stocking density on the Deenish Island farm, combined with Irish studies demonstrating measurable impact as a result of salmon farms, and the large scale review of salmon farm impacts on sea trout, it becomes increasingly difficult to believe the conclusion in the NIS that there will be no likely significant direct effects as a result of sea lice emanating from the salmon farm.

The requirement for certainty when carrying out an Appropriate Assessment has been clearly fleshed out in case law. It is now very well established in law that approval can only be granted for plans and projects when it has been established beyond all reasonable scientific doubt that the subject proposal will not adversely impact any Natura 2000 sites. In Case C-258/11, Sweetman & Others v An Bord Pleanála & Others, the CJEU held that:

> *"authorisation for a plan or project ....may therefore be given only on condition that the competent authorities ....are certain that the plan or project will not have lasting adverse effects on the integrity of the site. That is so where* ***no reasonable scientific doubt remains*** *as to the absence of such effects"* [emphasis added].

In Kelly v An Bord Pleanála & Ors. [2013 No 802 J.R.], with reference to Commission v Spain c-404/09, the High Court held in para. 36 that the competent authority must carry out an AA for a plan or project in light of the best scientific knowledge in the field and that the final determination of the competent authority must include complete, precise and definitive findings. The case repeated the conclusion of the CJEU at para. 44 in Case C-258/11, namely that an AA:

> "*cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt*."

This test has not only been established in Irish law but further developed in recent case law, with reference to the Kelly judgement, in Connelly v ABP [2018] IESC 31 (paras. 8.15 & 8.16) and Foley v EPA & Ors and Hayes v EPA & Ors [2022] IEHC 470 (para. 118).

We would observe in this case that the only evidence upholding the conclusion that there will be no significant impact on the QI of the nearby SACs as a result of sea lice relies entirely

[4] Shephard and Gargan (2017).Quantifying the contribution of sea lice from aquaculture to declining annual returns in a wild Atlantic salmon population. AQUACULTURE ENVIRONMENT INTERACTIONS. Vol. 9: 181–192, 2017 https://doi.org/10.3354/aei00223

on modelling carried out by Mowi. There is extensive evidence highlighting that this is likely a flawed conclusion, and we submit that it is incumbent upon the licencing authority to seek external independent validation of any modelling work before relying on it. This is particularly pertinent given it appears to conflict with a large body of published literature on the impacts, and with very plausible anecdotal evidence provided by the IFI on this issue.

## 4. Water Framework Directive

In Case C- 461/13 Weser the CJEU held:

> "Article 4(1)(a)(i) to (iii) of Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy must be interpreted as meaning that the Member States are required

- — unless a derogation is granted
- — to refuse authorisation for an individual project where it may cause a deterioration of the status of a body of surface water or where it jeopardises the attainment of good surface water status or of good ecological potential and good surface water chemical status by the date laid down by the directive."

However, we would argue that although the EIAR does address elements of water quality, it does not actually carry out a WFD assessment, as required by law. Water chemistry is just one of a number of quality elements which must be assessed under the Water Framework Directive. The assessment in the EIAR does not consider the WFD requirements holistically, rather it looks at specific things like nitrate pollution and Biological Oxygen Demand. According to the judgment in the Weser case, where any single quality element is reduced in class, even if it doesn't amount to an overall decline in the status of a WFD waterbody, that must be still considered a deterioration. We submit that no such assessment has been provided by the application. The decision maker must ensure that the point source responsible for discharges of nutrients and therapeutants does not lead to a deterioration in any of the quality elements in the surrounding waterbodies.

## 5. Bird Impacts

The location of this salmon farm is within the Deenish Island and Scariff Island SPA (Code 004175). Deenish Island and Scariff Island SPA is a site of high ornithological importance on account of the internationally important population of Storm Petrel and nationally important populations of Manx Shearwater, Fulmar, Lesser Black-backed Gull and Arctic Tern. It is also worth highlighting that the aforementioned Storm Petrel and Arctic Tern species, as well as Chough, are listed on Annex I of the E.U. Birds Directive

According to the NPWS, these islands support important populations of breeding seabirds. The Seabird 2000 survey recorded 1,960 pairs of Manx Shearwater on Scariff Island and 351 pairs on Deenish Island in 2000, giving a total of 2,311 pairs which is equivalent to c. 5% of

the national total[5]. On Deenish Island, birds breed in burrows on steep grassy slopes with rock outcrops in a limited area on the south-east side of the island. Deenish Island is also a traditional site for nesting terns, with 54 pairs of Arctic Tern present in 1995 - a population of national importance. Other seabirds which were recorded breeding in 2000 include Shag (5 pairs), Herring Gull (28+ pairs), Great Black-backed Gull (7 pairs) and Black Guillemot (several pairs).

Potential impacts on birds are outlined in the NIS:

> *"The greatest potential impact from human activity will be associated with boat movements around the site. The sensitivity of various high conservation value species to such impacts will vary"*

The NIS then proceeds to enumerate the risk to birds using a metric based on various aspects of the bird's sensitivity to disturbance, endangered status and habitat flexibility, and concludes that:

> *"The likelihood of impacts occurring is remote; it is concluded that there will be no likely significant effects."*

We are of the view that the chosen metric is unfit for purpose, and results in an overly positive assessment of the potential impacts on the protected species of this SPA. The NIS seeks to rely on a composite metric, which includes measures of species habitat suitability and species habitat flexibility. We would highlight that this is irrelevant in this context. Habitat flexibility estimates if a species is very flexible in habitat use, or if it is reliant on one particular habitat type; and habitat suitability assesses how likely a species is to use a particular habitat.

The Deenish Island and Scariff Island SPA's high ornithological importance is demonstrated by its support of important populations of breeding seabirds. The Seabird 2000 survey recorded 1,960 pairs of Manx Shearwater on Scariff Island and 351 pairs on Deenish Island in 2000, giving a total of 2,311 pairs which is equivalent to c. 5% of the national total.[6] As such, the impact on nesting species is the issue here, not their ability to nest or forage elsewhere. The SPA was designated because it is suitable for the species, and they naturally occur there. As such, assessing if they could utilise other habitats, or whether the existing habitat is suitable for them is moot. This is an area protected for the sole reason that it provides them with the habitat which they favour.

The impact of boat disturbances to these nesting bird species is entirely absent from the NIS, despite this being clearly identified in the NIS as having the greatest potential to impact on bird species. The energetic cost to the birds, and potential risks to their breeding success as a result of the flushing of birds due to boat traffic has not been assessed at all within the NIS. As such, the information which is necessary for the decision maker to reach a conclusion beyond all reasonable scientific doubt is absent. Habitat flexibility is irrelevant given that

[5] Deenish Island and Scariff Island SPA | National Parks & Wildlife Service (npws.ie)
[6] SITE SYNOPSIS (npws.ie)

Deenish Island is designated for the protection of breeding birds, no activity which requires the species to be flexible in their nesting choice should be licenced within the SPA. Likewise, the habitat suitability exercise is irrelevant as these species occur naturally on Deenish Island and are protected in that location. It is not up for debate whether the habitat is suitable for them or not.

As such, the assessment of impact significance is not fit for purpose in this case, and we submit that it cannot be relied upon by the decision maker. Until such a time as the impact of daily boat disturbances can be enumerated and discounted for each of the SCI species within the Deenish Island and Scariff Island SPA, any decision made cannot be considered to have reached the acceptable threshold for the decision maker to be able to conclude beyond reasonable scientific doubt, and as such will be non-compliant with Article 6(3) of the Habitats Directive.

## 6. 15% Threshold and Benthic Communities

The NIS outlined risks to QI sedimentary habitats in the Kenmare River SAC as a result of benthic enrichment beneath the salmon farm:

> *"The potential source of impact to benthic habitats from operations at the Deenish site is predominately organic enrichment due to settleable solids discharged from the fish sites which comprised fish faeces and feed waste. Solid wastes arising from the culture of fish can impact the seabed and associated benthic communities.*
>
> *Potential likely significant effects of the proposed project to the following marine Annex I benthic habitats of Kenmare River SAC could not be excluded at the Screening for AA stage (see Section 2.4 for summary):*
>
> *• Large shallow inlets and bays [1160]*
>
> *• Reef [1170]"*

However, any impacts were discounted with a reliance on a 15% disturbance threshold:

> *"For the practical purpose of management of habitats, a 15% threshold of overlap between a disturbing activity and a habitat is given in the NPWS guidance. Below this threshold, which was used by Marine Institute in the AA of aquaculture activity in Kenmare River SAC (Marine Institute, 2017, 2019) (see Appendix 1), disturbance is deemed to be non-significant.*
>
> *In all cases the percentage of the community overlapped by the proposed licenced area and/ or the sedimentation footprint was below the 15% threshold for a disturbing activity identified in NPWS guidance (NPWS 2013)."*

The source of this 15% threshold is unknown. The Commission framework on which it is allegedly based has not been included in the application documents, and it has not been possible to examine it. More fundamentally, it is not referred to in Article 17 of the Habitats

Directive. It is also not referred to in Article 6(3) of the Habitats Directive which sets out the obligation for Appropriate Assessment. And it is not anywhere referred to in the case law of the EU Court of Justice. On the contrary, several judgements of the Court of Justice clearly set out very specific requirements in relation to site specific considerations and the thresholds of scientific certainty required for each of the different tests required to be addressed under Article 6(3), as clarified by the CJEU. The court's interpretation of the case specific context for how effects need to be assessed relies largely on specific ecological considerations at issue for the habitat or species, and the nature of impacts.

For example, in Case C258/11 Sweetman, the loss of approximately 1% of the protected habitat was considered to be an adverse effect on the integrity of the site. Furthermore, in assessing the potential effects of a plan or project, their significance must be established in light, inter alia, of the characteristics and specific environmental conditions of the site concerned by that plan or project as clarified by the CJEU in case c-127/02 Waddenzee. Consequently, both the project and site characteristics are required to be considered which is quite opposite to the very generic approach proposed with this 15% rule by the NPWS.

As such we submit that this is an unlawful approach to risk assessment under the Habitats Directive, and percentage overlap should not be relied upon when drawing conclusions for Appropriate Assessment.

Additionally, the applicant proposes mitigation measures to protect the Annex I benthic habitats for which the SAC is designated. The NIS then concludes:

> *"It can be concluded that the operations at the proposed site, together with the mitigation measures proposed (i.e. implementation of a fallow period), will not significantly affect benthic ecology. Any disturbance experienced will be temporary with the species characterising the community types recovering to pre-disturbed state following cessation of activity."*

However, the fallow period is either for one month, or three, both are proposed at different points in the NIS, with no clarity provided for which is accurate.

Section 3.3.4 outlines that:

> *"Organic enrichment due to settleable solids discharged from the fish site is the main source of potential impact to marine benthic habitats. Potential effects of settleable solids will be mitigated through the implementation of fallow periods between production cycles at the site. Following each production cycle, the proposed Deenish site* ***will lie fallow for 3 months****."* [our emphasis]

But section 3.8 outlines that:

> *"Organic enrichment due to settleable solids discharged from the fish site is the main source of potential impact to Habitats Directive Annex I Habitats. Potential effects of settleable solids on Habitats Directive Annex I Habitats will be mitigated through the implementation of fallow periods between production cycles at the site. Following*

*each production cycle, the proposed Deenish site will lie fallow for a **minimum of one month**."* [our emphasis]

The applicant then asserts that the disturbance will be temporary:

*"Any disturbance experienced will be temporary with the species characterising the community types recovering to pre-disturbed state following cessation of activity."*

However, our information shows that this site was first licenced in 1995, and has been in operation ever since. It is difficult to conclude that this is a temporary disturbance given that it's now almost 30 years later Furthermore, having one/three month fallow periods does not provide optimum conditions for these sedimentary habitats for the other nine/eleven months of the year during which the farm is active.

Again, we submit that the potential pressure on sedimentary habitats has not been adequately identified in the NIS, the reliance on a 15% threshold is not lawful, and the proposed mitigation measures conflict with each other in terms of time limits. At best they allow an opportunity for sedimentary habitats to begin recovering for a quarter of the year, before being damaged again for the remainder of the year This harmful annual pattern is destined to continue indefinitely.

We submit that the efficacy of this proposed mitigation measure is insufficiently evidenced in the NIS, and as such is non-compliant with Article 6(3) of the Habitats Directive

## 7. Otters

Otters are known to occur in the Kenmare River SAC, in which the salmon farm site falls. The AA screening outlines that:

*"While otter is more an aquatic rather than a truly marine mammal, they are widely distributed in the SAC (Saunders, 2017) and so may occur within the proposed project area; consequently, potential effects to the otter cannot be excluded at the screening stage. Otter is brought forward to the Stage II AA NIS"*

The NIS outlines that Otters forage and feed within 80m to 100m of the coastline and can travel distances up to 500m across estuaries or between islands, but discounts them interacting with the farm site thus:

*"Although the proposed aquaculture renewal site is located within the Kenmare River SAC, the distance from the coastline of Deenish Island where otters can forage, is too significant for them to be found at the site.*

*The likelihood of an impact occurring on otters is remote, the consequence of an impact if realised is negligible; it is concluded that there will be no likely significant effects to otter."*

However, from the documentation on the NPWS site for the SAC, this does not seem to be entirely accurate. The following is a map of an Otter commuting buffer zone in the area, and clearly incorporates the entire boundary of Deenish Island, including the location of the fish farm.

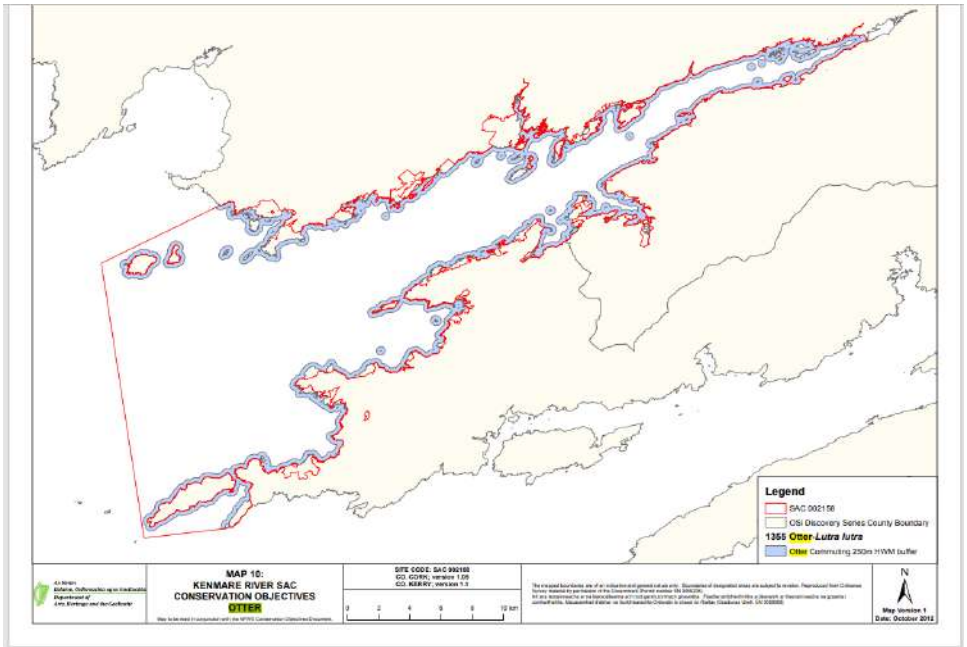


**Figure 1**: Map from NPWS Conservation Objectives for Kenmare River SAC[7]

As such, we would argue that the conclusion that there will be no impact is not scientifically robust. The CJEU at para. 44 in Case C-258/11 clearly states that an AA:

> "*cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt*."

We would highlight that we do not believe the information provided in the NIS in regard to otters is accurate, given it appears to conflict with the information provided by the NPWS on the SAC. Further information should be sought from the licencing authority on otter movements in the vicinity of the salmon farm.

## 8. Escapees

The risk of farmed salmon escaping from their pens to interbreed with wild salmon is a significant ecological concern. However, the NIS discounts the risk thus:

[7] npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002158.pdf

> *"By and large, escapees are more likely to die or be preyed upon at sea than to enter a river system, in particular if they are immature, which is the most likely prospect"*

But instances of farmed salmon being caught in inland rivers would cast doubt on this assertion. Indeed, IFI were quoted in this[8] article saying:

> *"This large number of escaped farmed salmon, with a high proportion of males likely to be sexually mature, presents a potential threat to local wild salmon populations,"*

The NIS relies on standard Mowi operating procedures to minimise the risk:

> *"Preventing the escape of fish is a priority for MOWI Ireland. MOWI has an improved standardised pen, net and mooring design adopted on all farms. They have classified their sites in Kenmare Bay as having a High Risk for susceptibility to storm damage based on the wave climate and hydrographic regime in the locality. Pen, mooring and anchor design within Kenmare Bay reflects this and strongly mitigates against storm damage thus reducing the risk of an escape event"*

It should be noted that MOWI Ireland are responsible for circa 80% of farmed salmon production in Ireland, and in its report to NASCO in 2019[9] Ireland reported that 800,000 farmed salmon had escaped from marine sites between 1996 and 2017. Elsewhere in Europe, MOWI protocols do not appear to be enough to withstand increasing storm events, with an incident at a Scottish MOWI salmon farm in 2020 seeing the escape of almost 50,000 farmed salmon in one instance[10]. Despite this, the risk of future climate disruption in the guise of increased storm strength does not appear to have been factored into their risk analysis for this farm.

Furthermore, the applicant seeks to minimise the seriousness of escapees, highlighting that large escapes have greater potential for impact:

> *"Large escapes (tens of thousands of individuals) of mature fish in the spawning season have a greater potential for impact significance than small escapes of smolts. Large escape events have the potential to have a significant effect on wild salmon populations in the area especially considering the low returns within many salmon rivers. However, the likelihood of an escape event occurring is remote and MOWI have adopted a range of measures to prevent such an occurrence; consequently, significant direct effects to the Qualifying Feature salmon and indirect effect to the Qualifying Feature freshwater pearl mussel can be excluded"*

While accurate, that does not diminish the risk from a smaller escape event. The risk is based not just on the number of escapees, but also on their level of maturity and the time of year of the escape event. The obligation on the decision maker in this instance is to determine if there is any risk to the integrity of the SAC, not to consider the acceptability of the quantum of risk posed. If there is any risk that the integrity of the SAC will be undermined, then the licencing body is obliged to not licence the activity. In Case C-258/11, Sweetman & Others v An Bord Pleanála & Others, it was held that:

[8] Lice, infectious disease and taking reef fish: The impact of salmon farms on marine biodiversity (noteworthy.ie)
[9] NASCO "Implementation Plan" for 2013-18
[10] Nearly 50,000 salmon escape from Scottish fish farm after storm damage | The Fish Site

*"authorisation for a plan or project ....may therefore be given only on condition that the competent authorities ....are certain that the plan or project will not have lasting adverse effects on the integrity of the site. That is so where* ***no reasonable scientific doubt remains*** *as to the absence of such effects"* [emphasis added].

## 9. Conclusion

Based on the above, we submit that the analysis presented is not sufficient for meeting the needs of an Article 6(3) Appropriate Assessment, or an Article 4 WFD assessment. Furthermore, it is our considered opinion that the licencing authority should be seeking external reviewers for the modelling data to ensure its scientific robustness.

We are of the view that the relevant authority does not have the data and analysis available to them to be able to conclude beyond reasonable doubt that there will be no impact on the SCIs and QIs of the various Natura 2000 sites under the ambit of Article 6(3) of the Habitats Directive.

Ultimately, it is An Taisce's position that the Licence must in fact be refused, as Mowi Ireland have not submitted the relevant information to address the impacts of their aquaculture operations at Deenish Island which have been carried out in breach of the EIA and Habitats Directives. The only course of action, An Taisce submits, which is lawfully open to the Minister in this case, is to reject the application for the Licence.

We should be grateful if you would take account of these concerns in considering this application. If approved, An Taisce maintains the right to appeal this application should we be dissatisfied with the approval and/or any conditions attached.

We should be grateful if you would provide to us in due course: an acknowledgement of this submission; the nature of the decision; the date of the decision; in the case of a decision to grant an approval, any conditions attached thereto, and the main reasons and considerations on which the decision is based; and, where conditions are imposed in relation to any grant of approval, the main reasons for the imposition of any such conditions.

Le meas,



Dr. Elaine McGoff,

Head of Advocacy,

An Taisce – The National Trust for Ireland

**From:** [redacted]
**Sent:** Monday, February 12, 2024 2:50 PM
**To:** Press Office DAFM <Press@agriculture.gov.ie>
**Subject:** Deenish renewal salmon farm licence

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

12-02-2024

Hi

"I want to object to the renewal of the MOWI Deenish licence application Ref:No. T06/202. "As this licence was revoked for overstocking by MOWI in 2019 by former Minister for the Marine, Michael Creed, it should stay revoked. MOWI should not be rewarded for breaking the conditions of their licence.to halt the expansion of this toxic industry.
Galway Bay Against Salmon Cages

Signed, [redacted]

[redacted]

Sent from my Galaxy