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CROMANE SEA FOODS LTD.

CROMANE, KILLORGLIN, COUNTY KERRY, IRELAND

Fish and Shell Fish exporters — Smoked Salmon specialists

Aquaculture and Foreshore Management Division

Department of Agriculture, Food and the Marine

Clogheen,

Clonakilty,

Co Cork.

Attention: Ms Maria Naughton

Re: Application for Aquaculture Licences in Castlemain Harbour – T06/382A, T06/383A & T06/384

Dear Ms Naughton

It is intended, in the first instance, to respond to the comments of An Taisce and Irish Lights in the context to which these comments refer to the applications referred to above. Perhaps a more in-depth understanding of the strategy underpinning such applications might have elicited alternative responses.

The applications for the three new sites is not intended to increase the volume of production of the applicant, but rather to spread the current level of activity on the existing site (already licensed – T06/255A) across that site and three additional non-contiguous sites for which licences are sought. The proposal is aimed at spreading the risk from mortality in oysters arising from shifting sands and sand banks and such similar natural occurrences that seem to be becoming more prevalent. Such events threaten the viability of the enterprise and the sustainability of associated jobs. Moreover, decentralising of the activity would spread the risk from oyster mortality that occurs from time to time on specific sites caused by as yet undetermined factors. Water quality may be a factor despite the fact that oysters are natural water purifiers. In this overall context, the applicant cooperates with the Marine Institute on a continuous oyster health monitoring programme. Moreover, the lowering of intensity of production on the existing licensed site would easily off-set the miniscule change to the spatial area change in terms of risk to the habitat conservation features of the estuary.

Other submissions, such as, those concerned with the impact on the tourism, seems less relevant. Indeed it could be argued that many of the activities relating to leisure can have a much more intensive impact on the integrity of the area, from a Natura 2000 perspective, when compared with oyster growing. Such arguments also fail to take into account the welfare and preservation of local communities. With the demise of salmon fishing and the substantial reduction in the mussel



industry, oyster farming is the last remaining activity contributing to the sustainability of the local fishing community.

I trust the arguments put forward will allay any concerns associated with the applications.

Yours sincerely

Danny Sullivan

Director

Official Records Document for
Shellfish Aquaculture Producers
Shellfish Health Record Book

As a business authorised under the fish health legislation,
you are **legally obliged** to keep accurate records.

Failure to do so will result in your inability to move molluscs to and
from your site and may ultimately lead to the withdrawal of your
authorisation which will result in the loss of your aquaculture license.



Forras na Mara
Marine Institute

Shellfish Aquaculture Production Business Details

APB Company Name / Sole Trader Name:

Maime Satoora MEd

FHA Number:

FHA/000266

Designated Site Contact/Contact Details:

NAME: LADBIT CRONIN

EMAIL/PHONE: louisebenderwonder@icr
0661976156 / 087 2921205

Species:

Pacific Oysters (C. gigas)

CARLTON HARBOR

Site location - Name of Bay in which site is located:

Tob / 255A

Site Reference(s): Details of Aquaculture licenses covered by the Fish Health Authorisation (FHA) for this operation: (AQL or T/ Reference)

SIGNATURE



POSITION

manager

THIS RECORD BOOK COVERS THE PERIOD BETWEEN

12 / 09 / 13 TO / /

Mortality Records

Mortality above the normal background level should be recorded below. In the case of unexplained increased mortality (which cannot be explained by environmental conditions, predation, transportation, handling etc), the Marine Institute should be notified immediately by phone (091 387200), Email: (notification@marine.ie) or Fax (091 387201).

Date	Location of Mortality on site	% Mortality Observed	Explanation for losses	Comments
14/7/14	near everywhere	50% to 60%	- dead calm water - small tide - heat	- only 70 - mortality on the Done moraine - added to 13
1/09/14	everywhere	5%	- dead calm water - no currents - warm weather	- only 4 - 1/2 grown
10/09/14	everywhere	30%	- dead calm water - no currents - warm weather	- 1/2 grown
2				
28/08/15	everywhere	35%	- fresh water - brown weed	- All grown started to increase - still good before
30/08/15	road Dethl 11/08/2015	30-50%	-	- pond dry test
30/08/16	ball grow 500 days	15%	- mold production - fresh water	- dry test
7/06/18	road summer 17	50-70%	- very warm weather - very calm	- dried dry alone

