



Cromane Lower,  
Killforglin,  
Co. Kerry  
30<sup>th</sup> July 2018

Mr. Oisín O'Kelly,  
Aquaculture & Foreshore Management Division,  
Department of Agriculture, Food & the Marine,  
National Seafood Centre,  
Clogheen,  
Clonakilty,  
Co. Cork.

Re: T6/378A & T6/391A  
Application for Aquaculture Licences in Castlemaine Harbour

Dear Mr. O'Kelly,

I refer to your letter of 16<sup>th</sup> July with the attached submissions and observations received from the public and others during statutory consultation stage of the application process

I have a number of observations on the advice given by the Marine Institute, the current management of the harbour and the public objections submitted:

1. On the Marine Institutes own admission the two sites I have applied for and the activity to be carried on therein would have little or no impact on the general environment as they have a 'B' classification.
2. The Departments Appropriate Assessment Report has based it's conclusions on outdated and erroneous data. It concluded that the proposed increase in the spatial area arising from the new licence applications would pose a risk to seston depletion and impact on the carrying capacity of the harbour. If the Department were up to date in their information they would be aware that there has been very little mussel cultivation in the harbour for a number of years. The majority of the mussel boats are currently for sale. Mussel seed is not being produced or settling due to the change in tidal currents following the erosion of Rossbeigh Creek. I have commissioned my sister, Sorcha Cronin O Reilly, Marine Scientist currently undergoing her PhD in Harbour Management, to investigate the current status of the harbour in conjunction with the Department of the Marine's studies.
3. The Department of the Marine have a responsibility to manage and maintain the harbour for the benefit of all – fishermen, residents and occasional users. I don't believe that the current framework being employed by the Department is fair or transparent and is subject to abuse when the Department are not fully aware of the activities in Castlemaine Harbour. Within the current licence applications there are a number of serious issues that need to be addressed:
  - (a) It has been suggested to me that the areas where the five licences are being considered are not compatible with the farming of oysters because they are within deep water areas. It would greatly concern me where these oysters would eventually be cultivated.

- (b) One application for 830 hectares, an area larger than Tralee town, by one individual is totally unacceptable. This individual is also one of the five licences being considered for the amendments. I am certainly of the opinion that this application was submitted to distort the overall total licencing ground being applied for.
  - (c) Within the Departments Assessment Report concern is expressed about the quality of the oysters being produced and this concern is justified when you see one individual, with previously licenced ground, being grant aided to the tune of over €100,000 this year alone to pack the area with an additional 3,000 trestles and over 20,000 oyster bags. This over cultivation will be of more detrimental effect to the area than my simple 5 hectare sites. This very same company has been earmarked for two of the five amendments recommended.
  - (d) The Departments current management of the harbour has allowed for unrealistic applications for oyster cultivation areas within mouths of rivers and inside deep water channels. It is the responsibility of the Department to oversee the application process and evaluate each application on an individual basis and with scientific clarity and surety about the viability of each area.
4. In regards to the objections from the public, while I totally accept and respect their opinions on saving our beaches, their information is completely misguided. My applications are not located within any tourist amenity, especially public beaches. My applications are for sub tidal mud flats that only expose at low tide in the middle of Castlemaine Harbour.

On a personal basis, as I am passionate about my way of life, I am sure that this is and will be mine and my family's future. I am sixth generation fisherman and in an effort to maintain this tradition I have spent the last 10 years in oyster farming. After returning home from working in Cork and after a very short period of time on unemployment assistance I went, as an apprentice, with one of the local oyster farmers and learned the intricacies of the business. From that, I was awarded the 'Back to Work' scheme which allowed me to develop my own oyster operation within his licenced oyster ground. Over the past five years I have invested over €50,000 in my business. As I could not remain indefinitely within this fisherman's ground I applied for my own two areas, totalling five hectares, over five years ago and it has taken the Department this long to access my applications.

With my oyster ground, I hope to live locally with my partner and our 7 month old son, to pay my taxes and contribute to our beautiful country. And in time to come, I would hope to pass on my skills and knowledge to the next generation.

I trust that the Department will look at my application and similar ones with common sense and justice. I trust that I will not find the Department discriminating in favour of larger operators and leave us smaller farmers without a living.

I look forward to a positive response from the Department.

Yours sincerely,

John Cronin O Reilly  
*John Cronin O Reilly*