

## Clarke, Damien

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**From:** Rémi LOUIS [rlouis@kerber.fr]  
**Sent:** 24 July 2015 11:23  
**To:** NSPA  
**Subject:** Comment on the National Strategic Plan for Sustainable Aquaculture Development (June 2015)

**Celtic Kerber Ltd.**

Contact Name : Rémi LOUIS

To whom it concerns,

On behalf of the above named company I wish to point out that the current draft **National Strategic Plan for Aquaculture** published in June 2015 for consultation gives me no confidence as an operator to invest or attract financial backing into the industry because of its failure to adequately address the issue of licensing.

The NSP document needs much more focus on solving the main problem of licencing in a meaningful and professional way with clear timelines and sanctions on those regulators who do not uphold them. There needs to be full access to all schemes – with the addition of innovative actions such as the aquaculture stock insurance scheme – for all producers and especially those waiting on licensing decisions and relying now for many years on Section 19(A)4 licences.

The lack of investment in the sector during the last fund (EFF) due to Department and political inaction has left the entire business extremely vulnerable. We are at the absolute mercy of the speed or interest taken by a handful of extremely powerful public bodies – some of which have no interest in the development of the sector. The Government must show its commitment to the sector in real terms instead of yet more reports by making grant aid available to those who need it to invest and compete on a level playing pitch.

Setting out various actions while the industry is blocked from drawing down grant aid because of the Department's inability to process licences means that only the state sector will gain from the fund by way of monies for staff and programmes for R&D and development.

It is very frustrating and disappointing for people involved in the industry for 6 years to see the lack of understanding of the basic needs of marine farmers contained in the document. The lack of any ambition in the NSP to grow the industry sustainably or to identify the key areas of investment for my sector :

- Market access
- Logistics and infrastructure
- Better use of existing sites – standardisation of Appropriate assessments and engineering protocols, discharge licences, etc
- increase of farm size to commercially viable scale
- encouraging employment opportunities
- investment in best equipment and infrastructure.

We see our competitors abroad making very good use of public funds to become more efficient and better placed to take advantage of market shifts and new opportunities. In Ireland, the State's role has been to hold the industry back and in the past seven years it has not been able to deliver either licences or legitimate grant aid. Combine that failure with the lack of direction, low level of expertise or interest in the Department and elsewhere and the focus by agencies on completely irrelevant investments and R&D would indicate a very difficult future for the industry in Ireland.

The NSP must allow producers who have been forced to rely on Section 19 licences to receive grant aid. It must also set out clearly how the licencing system is going to be fixed with timelines which make sense to commercial companies, investors and the market.

**Rémi LOUIS**

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