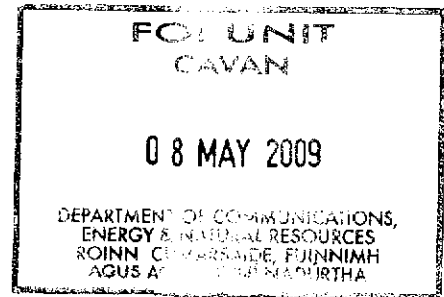


5 May 2009

Freedom of Information Officer  
Department of Communications, Energy  
and Natural Resources  
Adelaide Road  
DUBLIN 2



Dear Officer

I should like to have access to the papers associated with the review conducted by the (then) Secretary General of the (then) Department of Communications, Marine and Natural Resources in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

I am enclosing a cheque for €25.

Yours faithfully

25/05/2009

**FOI Request Reference: FOI/2009/15**

I refer to your FOI request under Section 7 of the Freedom of Information Acts, 1997 and 2003, received in this office on 08/05/2009 requesting access to papers associated with the review conducted by the then Sec General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks. The application was received along with the associated fee.

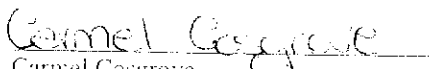
The officer handling your request will be Ms Kathleen Regan, Inland Fisheries Division, Department of Communications, Energy and Natural Resources, 29-31 Adelaide Road. Kathleen can be contacted on 01 6782296.

You can expect to receive your decision by the 05/06/2009.

If you have not received a decision by that time, you are automatically entitled to appeal to the Department for a review of the matter. This review proceeds on the legal basis that the initial request is considered to be refused once the specified time for responding to it has expired. A request for a review should be addressed to the undersigned at the address shown.

Please note the Department of Communications, Energy and Natural Resources has a policy of posting a summary of non-personal requests and decisions on the Departments website for reference purposes.

Yours sincerely,

  
Carmel Cosgrove

FOI Unit  
Department of Communications,  
Energy and Natural Resources  
Elm House,  
Earlsvale Rd  
Cavan

Phone: 01 6782962



An Rann Lámaráide,  
Fainneán agus Acmhainní Náúrótha  
Baile Átha Cliath 2.

Department of Communications,  
Energy and Natural Resources,  
Dublin 2.

3 June 2009

FOI Request Reference: FOI/2009/15

I refer to your FOI request under Section 7 of the Freedom of Information Acts, 1997 and 2003 received in this office on 8 May 2009 requesting access to papers associated with the review conducted by the then Secretary General of the Department of Communications, Marine and Natural Resources in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

Under Section 9 and Section 29 (2A) (a) of the Acts the Department is applying the following extension of time to the request.

| Extension Type   | Nos of Days     | Notes |
|--|-----------------|-------|
| Volume Extension<br>3rd Party Extension<br>Voluminous 3rd Party<br>Extension | 20 working days |       |

As discussed, back in 2007 matters relating to the management of salmon farms and the impact of sea lice on wild salmon stocks and the Inland Fisheries Sector were under the same Department. After the General Election in 2007 all matters relating to salmon farms and sea lice issues were transferred to the Department of Agriculture, Fisheries and Food (DAFF) which is based at Clonakilty, Co Cork. Under the FOI Act I am obliged to consult and obtain clearance from DAFF before releasing any documentation from this Departments files. I also need clearance from the Central and Regional Fisheries Boards. I will be writing to both DAFF and the Central and Regional Fisheries Boards setting out the papers I intend to release to you.

You may expect to receive your decision at the latest by 3 July 2009. However, depending on the documentation to be assessed by the third parties an earlier response time may prove possible. The undersigned officer may be contacted at the details below should you have any questions or concerns about your request.

**Right of Appeal**

You may appeal this decision by writing to the Office of the Information Commissioner, 18 Lower Leeson Street, Dublin 2.

Yours sincerely

Kathleen Regan  
Inland Fisheries Division  
Phone No: 01 6782296  
Email: [kathleen.regan@dcenr.gov.ie](mailto:kathleen.regan@dcenr.gov.ie)



Minister for Communications,  
Energy and Natural Resources,  
Department of Communications,  
Energy and Natural Resources,  
Dublin 4.

Department of Communications,  
Energy and Natural Resources,  
Dublin 4.

21 July 2009

FOI Request Reference: FOI/2009/15

I refer further to your request under the Freedom of Information (FOI) Acts, 1997 and 2003 requesting access to papers associated with the review conducted by the then Secretary General of the Department of Communications, Marine and Natural Resources in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

Enclosed are copies of documents Nos. 1 to 45, as shown in the schedule of records attached. Documents No. 46 to 51 also shown in the schedule are withheld under Section 20 of the FOI Act. The schedule gives a brief description of all records relating to your request held on file by this Department. If you have any queries regarding this correspondence you can contact me by telephone at the number beneath.

I wish to advise you that, if for any reason you are not satisfied with the outcome of your request, you are entitled to seek a review by appealing the decision. To appeal, you need to write to the FOI Unit, Department of Communications, Energy and Natural Resources, Elm House, Earlsvale Road, Cavan. You must make your appeal within 4 weeks of the date of this letter, but the making of a late appeal may be permitted in certain circumstances. The review will involve a complete reconsideration of the matter by a more senior member of the staff of this Department.

Please note that an application fee for an appeal is currently €75.00 and a reduced fee of €25.00 applies if you are covered by a Medical Card.

If claiming a reduced application fee, the request must also be accompanied by

- The Medical Card registration number
- The name of the issuing Health Board
- Your consent to the verification of these details with that Health Board.

Payment should be made by way of bank draft, money postal order, or personal cheque made payable to "Department of Communications, Energy and Natural Resources".

On receipt of the fee, you will be advised of when you can expect a decision on your appeal, and the contact details of the person handling the appeal.

Yours sincerely  
*Kathleen Regan*  
Kathleen Regan  
Inland Fisheries Division  
Phone No: 01 6782296  
Email: kathleen.regan@dcenr.gov.ie

**FOI Request Reference: FOI/2009/15**

**Schedule of Records: Summary of Decision Making**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

| Record No. | Brief Description & Date of Record  | File Ref.          | No. of Pages | Relevant facts | Findings/ conclusions (Public Interest Considerations, (If applicable)) | Grant/refuse/ part-grant | Basis of Refusal: Section of Act | Record edited/Identify deletions |
|------------|---|--------------------|--------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 1          | Letter from Northern Regional Fisheries Board (NRFNB) to Department dated 12 July 2006  | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 2          | Summary of provisional Central Fisheries Board (CFB) data on potential impacts of Sea lice on salmon smolts dated 12 June 2007. | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 3          | View of the Central & Regional Fisheries Boards on the sea lice/salmon aquaculture/wild salmonids initiative, November 2006     | <i>ditto</i>       | Four (4)     |                |   | Grant                    |                                  | n/a                              |
| 4          | Letter from the CFB to Department dated 8 October 2007  | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 5          | Letter from Department to CFB dated 26 July 2006  | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |

**FOI Request Reference: FOI/2009/15**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|---|--------------------|--------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 6          | Letter from CFB to Department dated 27 June 2006                                      | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 7          | Email from Inshore Ireland Dated 5 October 2006                                       | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 8          | Letter from Secretary, Save Our Sea Trout (SOS) to Department dated 21 September 2007 | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 9          | Letter from Secretary, SOS, to Department dated 21 September 2007                     | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 10         | SOS briefing document for meeting with Department on 16 April 2007                    | C17/9/148 Volume 3 | Fifteen (15) |                |   | Grant                    |                                  | n/a                              |
| 11         | Letter from WRFB to Department dated 2 August 2006                                    | C17/9/148 Volume 3 | Three (3)    |                |   | Grant                    |                                  | n/a                              |

**FOI Request Reference: FOI/2009/15**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|--|--------------------|--------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 12         | Letter from Department to WRFB dated 12 July 2006  | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 13         | Letter from WRFB to Department dated 9 May 2006  | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 14         | Brief on Sea trout stock collapse in Connemara 1988-2007 - 20 years of Destruction from WRFB dated 30/11/2007    | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 15         | Letter from WRFB to Department dated 1 August 2006   | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 16         | Letter from Department to WRFB dated 4 August 2006   | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 17         | BIM response to CZAD draft interim report to Minister of sea lice monitoring and control working group of 24 May | C17/9/148 Volume 3 | Eleven (11)  |                |   | Grant                    |                                  | n/a                              |

**FOI Request Reference: FOI/2009/15**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

**Schedule of Records: Summary of Decision Making**

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|------------|---|--------------------|--------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 18         | Email from Marine Institute (MI) to Department dated 6 October 2006   | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 19         | Letter from MI to Department dated 1 June 2007                        | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 20         | Email from MI to Department dated 18 May 2007                         | C17/9/148 Volume 3 | Three (3)    |                |   | Grant                    |                                  | n/a                              |
| 21         | Sea Lice WG Report to Minister 2007 (No date) (Executive Summary)     | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 22         | Sea Lice WG Report to Minister 2007 (no date)                         | C17/9/148 Volume 3 | Four (4)     |                |   | Grant                    |                                  | n/a                              |
| 23         | Email Draft report to Minister v3 Dated 11 May 2007 - Sea Lice Report | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |

**FOI Request Reference: FOI/2009/15**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|--|--------------------|------------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 24         | Internal email 'sea lice report' dated 16 May 2007   | C17/9/148 Volume 3 | Two (2)          |                |   | Grant                    |                                  | n/a                              |
| 25         | Draft Interim Report to Minister entitled Sea Lice Monitoring and Control Working Group dated May 2007 | C17/9/148 Volume 3 | Twenty five (25) |                |   | Grant                    |                                  | n/a                              |
| 26         | Internal email entitled draft report to Minister v3 dated 11 May 2007                                  | C17/9/148 Volume 3 | Two (2)          |                |   | Grant                    |                                  | n/a                              |
| 27         | Draft Meeting Paper entitled Sea Lice Monitoring and Control Working Group Dated November 2006-CZMD    | C17/9/148 Volume 3 | Eight (8)        |                |   | Grant                    |                                  | n/a                              |
| 28         | Internal email entitled Sea Lice Monitoring & Control Working Group dated 29 November 2006 @ 18:08     | C17/9/148 Volume 3 | Two (2)          |                |   | Grant                    |                                  | n/a                              |
| 29         | Internal email entitled Sea lice Monitoring & Control Working Group dated 28 November 2006             | C17/9/148 Volume 3 | Three (3)        |                |   | Grant                    |                                  | n/a                              |

**FOI Request Reference:** FOI/2009/15

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|---|--------------------|--------------|----------------|---|-------------------------|----------------------------------|----------------------------------|
| 30         | Internal email entitled Inshore Ireland - sea lice debate dated 9 October 2006 @ 10.23  | C17/9/148 Volume 3 | Three (3)    |                |   | Grant                   |                                  | n/a                              |
| 31         | Internal email entitled Inshore Ireland - sea trout/sea louse debate dated 9 October 2006 @15.23  | C17/9/148 Volume 3 | Five (5)     |                |   | Grant                   |                                  | n/a                              |
| 32         | Internal email entitled Sea Lice Monitoring & Control Working Group dated 29 November 2006 @9:14  | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                   |                                  | n/a                              |
| 33         | Internal memos dated 4 August 2006, 8 September 2006 with draft sea lice monitoring and control working group doc dated 8 February 2006 | C17/9/148 Volume 3 | Three (3)    |                |   | Grant                   |                                  | n/a                              |
| 34         | Internal email entitled Sea lice meeting on Monday dated 22 September 2006 at 15:43   | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                   |                                  | n/a                              |
| 35         | Internal email entitled Sealice meeting on Monday dated 22 September 2006 @ 11:52   | C17/9/148 Volume 3 | One (1)      |                |   | Grant                   |                                  | n/a                              |
| 36         | Internal email entitled Sealice meeting on Monday dated 22 September 2006 @ 15:43   | C17/9/148 Volume 3 | One (1)      |                |   | Grant                   |                                  | n/a                              |

**FOI Request Reference: FOI/2009/15**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|--|--------------------|---------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 37         | Internal email entitled Sea lice meeting on Monday dated 22 September 2006 @ 15:43   | C17/9/148 Volume 3 | Thirteen (13) |                |   | Grant                    |                                  | n/a                              |
| 38         | Internal email entitled draft executive summary of sea lice Working Group Report dated 22/5/2007   | C17/9/148 Volume 3 | Four (4)      |                |   | Grant                    |                                  | n/a                              |
| 39         | Internal email entitled Sea lice Monitoring & Control Working Group dated 30 November 2006 @ 08:49   | C17/9/148 Volume 3 | Six (6)       |                |   | Grant                    |                                  | n/a                              |
| 40         | Internal email entitled Document from the Central & Regional Fisheries Boards on the sea lice/salmon aquaculture/wild salmonids initiative dated 29 November 2006 at 08:34 | C17/9/148 Volume 3 | Seven (7)     |                |   | Grant                    |                                  | n/a                              |
| 41         | Briefing note for Secretary General entitled Meeting with Irish Salmon Growers Association - Sea lice Monitoring and Control working group dated 31 January 2007           | C17/9/148 Volume 3 | Four (4)      |                |   | Grant                    |                                  | n/a                              |
| 42         | Draft agenda dated 30 November 06  | C17/9/148 Volume 3 | One (1)       |                |   | Grant                    |                                  | n/a                              |

**FOI Request Reference: FOI/2009/15**

Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|---|--------------------|--------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 43         | Document entitled Wild Fisheries not dated.   | C17/9/148 Volume 3 | One (1)      |                |   | Grant                    |                                  | n/a                              |
| 44         | Document marked Confidential (for Frank Sheridan) dated 24 May 2007   | C17/9/148 Volume 3 | Three (3)    |                |   | Grant                    |                                  | n/a                              |
| 45         | Internal email dated 29 November 2006 @ 17:19   | C17/9/148 Volume 3 | Two (2)      |                |   | Grant                    |                                  | n/a                              |
| 46         | Letter from Irish Salmon Growers Association, IFA Aquaculture to the Department dated 28 May 2007   | C17/9/148 Volume 3 | One (1)      |                |   | Refuse                   | Section 20 of FOI Act            | n/a                              |
| 47         | Email from then Secretary General to Executive Secretary of the IFA dated 29 May 2007 at 08:42 entitled Response in relation to Report on Sea Lice. | C17/9/148 Volume 3 | One (1)      |                |   | Refuse                   | Section 20 of FOI Act            | n/a                              |
| 48         | Faxed letter to then Secretary General from Executive Secretary of the IFA not dated.   | C17/9/148 Volume 3 | Two (2)      |                |   | Refuse                   | Section 20 of FOI Act            | n/a                              |

**FOI Request Reference: FOI/2009/15**

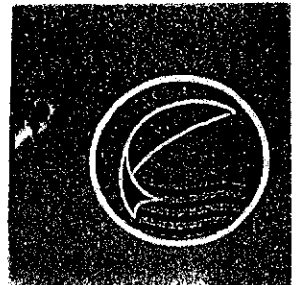
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Requesting access to papers associated with the review conducted by the then Secretary General of DCMNR in 2007 into the regulation and management of salmon farms and the impact of sea lice on wild salmon stocks.

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|------------|---|--------------------|--------------|----------------|---|--------------------------|----------------------------------|----------------------------------|
| 49         | Email from then Secretary General to IFA Aquaculture entitled response in relation to Report on Sea Lice dated 31 May 2007 @ 0:23                       | C17/9/148 Volume 3 | Two (2)      |                |   | Refuse                   | Section 20 of FOI Act            | n/a                              |
| 50         | Email from IFA Aquaculture to then Secretary General of the DCEMR dated 30 May 2007 at 19:00 entitled Response in relation to Report on Sea Lice @19:00 | C17/9/148 Volume 3 | Four (4)     |                |   | Refuse                   | Section 20 of FOI Act            | n/a                              |
| 51         | Internal memo dated 29 May 2007 to Runai Aire/Runai Aire Stait  | C17/9/148 Volume 3 | One (1)      |                |   | Refuse                   | Section 20 of FOI Act            | n/a                              |
|            |   |                    |              |                |   |                          |                                  |                                  |
|            |   |                    |              |                |   |                          |                                  |                                  |
|            |   |                    |              |                |   |                          |                                  |                                  |
|            |   |                    |              |                |   |                          |                                  |                                  |



Northern Regional Fisheries Board  
Bord Iascaigh Réigiúnach an Tuaisceart



Fisheries Ireland  
Our Natural Heritage

- 1. For information - propose to refer to this in reply from SG (draft with you)
- 2. See MB's comment re X
- 3. Can you identify 'single bay management' document referred to

17/07/06

12<sup>th</sup> July 2006  
Our ref - H/06/DCMNR/MB/002

Mr Martin Brennan  
Assistant Secretary  
Department of Communications, Marine and Natural Resources  
Leeson Lane  
Dublin 2

Mr Sheridan  
As discussed  
I don't think we can go as far as X at this stage. I would like to see the doc. at y at some st

Dear Martin

The Liaison Committee of the Central and Regional Fishery Boards met in Derry on 6<sup>th</sup> of July. was instructed as Secretary of the group to raise the issue of sea lice control with the Secretary General Brendan Tuohy; as a follow through on his commitment he would personally intervene in this issue and make progress towards resolving the outstanding issues between Inland Fisheries and the Aquaculture Section.

The Liaison Committee decided to delay the issue of the prepared press release on the sea lice issue pending their assessment of the new initiative being taken by the Secretary General.

I am pleased that the Secretary General at a meeting on the 10<sup>th</sup> July has now started the process within the DCMNR. The liaison group and the NFME await the outcome of this new initiative which will be outlined in a letter to be issued by the Secretary General to the Chairpersons and the CEO's. As I was involved in the initial discussions with Ms Jacqueline Doyle of the M.I. and the industry before she drew up the following - single bay management document might I suggest that this document be used as the basis of an integrated approach towards solving some of the outstanding problems in the industry.

X/

The Liaison Committee and the NFME would like a clear unambiguous statement to issue from DCMNR that on the precautionary principle they have serious concerns that the aquaculture industry has not adequately addressed the management of sea lice within the industry.

Yours sincerely

*Harry Lloyd*

Harry Lloyd  
Secretary Liaison Committee

c.c. Liaison Committee and NFME

The Northern Regional Fisheries Board  
Station Road  
Ballyshannon  
Co. Donegal  
T: 071 9351435  
F: 071 9351436

Record No 2

not on file Vol 3

## Summary of Provisional CFB Data on Potential Impacts of Sea Lice on Salmon Smolts

The table below shows the return rates of hatchery reared salmon smolts released from three bays with salmon farms in the west of Ireland. The study was undertaken as part of the EU funded Sumbaws programme over the 2003-2006 period. One group, the Slice group, were treated with Slice to give protection against sea lice before being released to sea while the other group, the Control group, were not given Slice.

Results show a statistically significant difference in return rates for the Slice treated group in six of seven release groups when farm salmon production was ongoing in each bay in spring, with Slice treated fish returning at higher rates. There was no significant difference in return rate of both groups of adult salmon to Gowla in 2006. No farmed salmon were present in the Gowla estuary at the time of smolt release in 2005.

These data demonstrate that migrating salmon smolts may be impacted by sea lice in bays in the West of Ireland with ongoing salmon farm production in spring.

Dr. P Gargan 12<sup>th</sup> June 2007.

| RELEASE DATE | MIG YR | FISHERY YR | RELEASE LOCAL | Est. No. MIG. | HATCHERY | Total Tag Recoveries | Group         | P Value | Significant Difference |
|--------------|--------|------------|---------------|---------------|----------|----------------------|---------------|---------|------------------------|
| 28/04/2003   | 2003   | 2004       | GOWLA RIVER   | 4955          | CONG     | 35                   | Slice Group   | P<0.001 | Yes                    |
| 28/04/2003   | 2003   | 2004       | GOWLA RIVER   | 4822          | CONG     | 3                    | Control Group |         |                        |
| 07/04/2004   | 2004   | 2005       | GOWLA RIVER   | 4655          | CONG     | 51                   | Slice Group   | P<0.001 | Yes                    |
| 07/04/2004   | 2004   | 2005       | GOWLA RIVER   | 4699          | CONG     | 22                   | Control Group |         |                        |
| 07/04/2005   | 2005   | 2006       | GOWLA RIVER   | 4583          | CONG     | 54                   | Slice Group   | P>0.05  | No                     |
| 07/04/2005   | 2005   | 2006       | GOWLA RIVER   | 4735          | CONG     | 53                   | Control Group |         |                        |
| 29/04/2003   | 2003   | 2004       | INVERMORE     | 4589          | CONG     | 17                   | Slice Group   | P<0.001 | Yes                    |
| 29/04/2003   | 2003   | 2004       | INVERMORE     | 4594          | CONG     | 9                    | Control Group |         |                        |
| 08/04/2004   | 2004   | 2005       | INVERMORE     | 4653          | CONG     | 37                   | Slice Group   | P<0.05  | Yes                    |
| 08/04/2003   | 2004   | 2005       | INVERMORE     | 4671          | CONG     | 26                   | Control group |         |                        |
| 08/04/2005   | 2005   | 2006       | INVERMORE     | 4716          | CONG     | 31                   | Slice Group   | P<0.001 | Yes                    |
| 08/04/2005   | 2005   | 2006       | INVERMORE     | 4750          | CONG     | 17                   | Control group |         |                        |
| 12/04/2004   | 2004   | 2005       | ERRIFF RIVER  | 4325          | CONG     | 44                   | Slice Group   | P=0.11  | No                     |
| 12/04/2004   | 2004   | 2005       | ERRIFF RIVER  | 4229          | CONG     | 34                   | Control Group |         |                        |
| 04/04/2005   | 2005   | 2006       | ERRIFF RIVER  | 4659          | CONG     | 36                   | Slice Group   | P<0.001 | Yes                    |
| 04/04/2005   | 2005   | 2006       | ERRIFF RIVER  | 4689          | CONG     | 2                    | Control Group |         |                        |

**View of the Central & Regional Fisheries Boards on the sea lice/ salmon aquaculture/ wild salmonids initiative, November 2006.**

The Central and Regional Fisheries Boards (C&RFBs) are confident that the process established and chaired by the Secretary General, Brendan Tuohy, has the potential to address the sea lice/ salmon aquaculture /wild salmonids problem.

The C&RFBs are satisfied that a suitable strategy to address these longstanding issues can be developed and agreed in a small number of focused meetings.

The C&RFBs welcome Dr. Whelan's comments that the accepted international view of the science is now unequivocal in relation to the link between sea lice from salmon aquaculture and the potential impact on sea trout stocks. Of particular importance is his statement that the international salmon aquaculture industry also accepts the link. This creates a clear background against which a deliverable strategy can be developed and implemented.

The C&RFBs consider that any agreed strategy must be uncomplicated, explicit and transparent, capable of delivering results and must contain an implementation and monitoring element. They also consider that responsibility should rest directly with the Chief Executive Officers of the agencies involved who should report progress on a real time basis to the Secretary General (or his nominee who would keep him briefed). Delivery would be a critical corporate governance matter and might best be underpinned through a service level agreement.

The C&RFBs believe that implementation of an agreed strategy will require significant change and this must be recognised now and signed up to by all parties. Failure to do this will continue the deadlock which has existed for the past eighteen years and we all recognise that those years now represent a wasted opportunity.

The C&RFBs have identified the nine bullet points below as the principal issues that have emerged from our inaugural meeting.

- The urgency of the issue.
- Acceptance of the precautionary approach and acknowledgement of the need to achieve sustainability of the two industries involved.
- Management of aquaculture sites is emerging as the main issue, including issues of space and suitability of sites, and their proximity to important wild fisheries.
- Examination of international best practice, comparison with the current system in Ireland and an assessment as to whether the current best practice in fact is adequate to protect the wild salmon or sea trout.

- Legislation may need to be enforced or amended to change current practices.
- A clear sequence of actions is required for breaches of lice protocol levels.
- The relevance of the EU Habitats Directive to this issue and the need to take a proactive approach. In this regard it is important to note that a number of rivers designated as SAC's for salmon in the West discharge into bays with aquaculture sites and recent studies indicate an impact from sea lice on salmon smolt survival.
- The need to be responsive to the scientific evidence and how this can be done in an ongoing manner.
- The issue of carrying capacity in bays and over-concentration of farms in some areas.

To facilitate a productive and balanced discussion at our next meeting the C&RFBs have identified eight further priority areas for discussion and these are set out below.

**1. Monitoring.** +6

The current monitoring programme is comprehensive but we have previously recommended changing the critical period to include February.

**2. Treatment.** +7

A clear strategy for sea lice treatment needs to be set out for each bay, in the early winter and prior to the critical spring period. Failure to achieve adequate control of sea lice needs to be linked to appropriate sanctions and a strategy for achieving effective lice control.

**3. Separation of Generations.**

The minimum separation distance between generations of one tidal excursion would help ensure that lateral transfer of juvenile lice does not take place between sites.

**4. Fallowing.** +5

Currently it is the production sites with larger fish that are operating in spring in the inner estuaries close to rivers when wild smolts are migrating which is a cause of great concern. There is need to shift the balance of production sites away from important wild salmonid fisheries. In this context, the overall availability of fallowing sites and the location of production sites should be reviewed on a bay by bay basis.

**5. Licensed Areas.**

Many areas were licensed up to twenty years ago before the potential threat from marine salmon farming to wild salmonid stocks became apparent. Many of these sites are located within a few kilometres from the mouths of important rivers, some of which are designated as Special Areas of Conservation under the EU Habitats Directive. This designation requires that salmon stocks are maintained at favourable conservation status and this requirement needs to be examined in the context of the potential impact from marine salmon farms.

Ireland's responsibilities under the Williamsburg Agreement of NASCO also need to be considered with regard to licensed areas. A review of the current licensed areas, re-location of sites and availability of fallowing sites is required. This should be coupled with a critical evaluation of the current operation of sites and whether certain licensed areas are in use and could be re-allocated.

**6. The Critical Period**

The current critical period for wild salmonid smolt migration to sea as defined by the monitoring programme is March to May, which is currently the period required to maintain the lowest sea lice levels. However, achievement of low lice levels is required prior to the onset of smolt migration and the critical period should be extended to include February.

**7. Appropriate sanctions**

Sanctions have not been applied to date for breaches of conditions of an aquaculture licence. If we are to succeed in achieving a well regulated aquaculture industry which can operate alongside sustainable wild fisheries, the imposition of appropriate sanctions, where necessary, will be central to achieving such an outcome. If legislative changes are required this must be a priority.

**8. Other Issues**

The issue of most concern in the present management of salmon aquaculture relates to the "notice to treat" instruction. There have been many instances where such a notice has been issued and sea lice levels have not been maintained below protocol levels in subsequent months. Apparently, it is not an offence to breach protocol lice levels but it is only an offence to fail to comply with a notice to treat instruction. The current legislation is clearly not sufficient at ensuring sustainability of wild salmonids and needs to be amended urgently.

We consider these encapsulate the principal areas of concern to both sectors and could form a good template to work from. We would, of course, welcome any additions to this list or would be happy to consider an alternative template.

At Appendix 1 is a suggested framework for a short report / strategy –

## Appendix 1

### Chapter 1

Introduction

Short statement on this initiative

Background

Short general piece on the issues both nationally and internationally and history to date.

### Chapter 2

Description / quantification of both industries in Ireland

Wild salmonid fisheries – location, size, importance, and issues identified.

Salmon Aquaculture - as for wild fisheries. (We discussed the opportunity to establish the number of 'operating/ real' licenses).

### Chapter 3

Agreed strategy to address the issues identified (separate section on wild and farmed sectors) with timelines, milestones, and by whom any actions identified should be, if possible, be quantifiable.

### Chapter 4

Implementation and Monitoring of agreed strategy.

To apply to both sectors.

This chapter is where we ensure balanced success for all parties.

It must be clear and unequivocal and those Civil/ Public Servants with responsibilities in this area must be accountable.

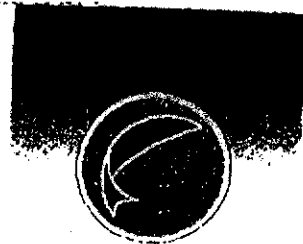
However, we must ensure we are not setting impossible tasks for people as that will not ensure success.

Regular reports to be made available to both industries.



Central Fisheries Board

An Príomh-Bhord Iascaigh



Fisheries Ireland  
Our Natural Heritage

8<sup>th</sup> October 2007

Mr. Aidan Dunning  
Secretary General  
Department of Communications, Energy & Natural Resources  
Leeson Lane  
Dublin 2

*and 11/10*

RECEIVED IN SECRETARY  
GENERAL'S OFFICE  
10 OCT 2007  
DEPARTMENT OF  
COMMUNICATIONS, ENERGY  
AND NATURAL RESOURCES

Dear Aidan,

On behalf of my Board, management and staff I would like to congratulate you on your appointment as Secretary General and to assure you of our full support.

I appreciate you are currently very busy briefing yourself on your extensive remit, however, my Board, at its recent meeting, discussed the very serious issues surrounding the management of our valuable sea trout stocks, particularly management of sea lice levels on salmon farms. The Board acknowledged the strong, effective and hands on leadership role played by your predecessor, Brendan Tuohy, in his role as Chairman of the Review Group examining this matter. Considerable progress was made by Brendan culminating, we understand, in the presentation of a report/position paper to Minister Noel Dempsey, TD, just prior to the last general election.

*X*

The Board is very concerned to ensure that the progress made to date is built on and that the momentum generated prior to the general election is not lost. The Board is strongly of the view that, to be effective, it requires your participation and leadership, particularly now that Aquaculture is the responsibility of another Minister.

My Board therefore requests that an early meeting of the Group be convened under your chairmanship with a view to advancing this matter further. I would be happy to meet you and your officials with a view to preparing for such a meeting.

Finally, every good wish in your new position.

Yours sincerely,

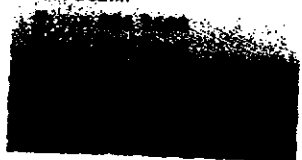
*John O'Connor*  
John O'Connor  
Chief Executive Officer

*Mr. Brennan  
It is advised that  
is the position of  
about.*

cc Frank Sheridan, Inland Fisheries

*and 11/10*

The Central Fisheries Board  
Swords Business Campus  
Balheary Road  
Swords  
Co. Dublin



Record No. 5

Ref: C17/9/148

26  
27 July 2006

Mr David Mackey  
Chairman  
Central Fisheries Board  
Swords Business Campus  
Balheary Road  
Swords  
Co Dublin

Dear Dave,

I refer your letter of 27 June 2006 and to related correspondence from Harry Lloyd, Secretary to the NFME, in relation to the interaction between wild sea trout and salmon aquaculture.

I have discussed the matter in depth with the responsible divisions in the Department and have gained some understanding of the complexity of the issues under debate. I recognise the concerns expressed by the Fisheries Boards as I had the opportunity to hear them firsthand when I met with the NFME on 31 May last and the corporate responsibility exercised by the other agencies involved, viz. the Marine Institute and BIM.

I have considered the progress made by the Review Group on Sea Lice Monitoring and Control. I do not believe it is acceptable that the group of officials involved should suspend their proceedings without completing the task assigned to them by the Minister. I believe their terms of reference are unambiguous in requiring them to review, in the light of experience, the operation of the systems and processes for controlling sea lice levels at marine finfish farms, to identify any necessary changes and to set out an action plan with specific timeframes for implementation of such changes.

I propose to chair a resumed meeting of the group in September and to proceed to completion of the exercise as a matter of urgency. I will be asking the chief executives and officers of the State agencies to ensure full cooperation and participation by all the nominated members and to insist that they pursue all possible initiatives and bring flexibility to solving any problems.

I share your confidence that we can bring a satisfactory and balanced resolution to the matter through following this course of action and I will meet you in September to discuss this further and update you on developments.

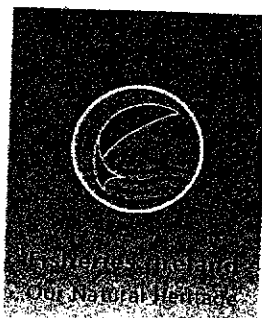
Yours sincerely

Brendan Tuohy  
Secretary General

~~Letter from~~  
Record No 6



**Central Fisheries Board**  
An Príomh-Bhord Iascaigh



FAO ~~Revised~~ *F Sheridan draft*  
For Observations - *Re-act & ensure he is involved*  
For Action  
For Follow up  
For Information  
C.C. M Brennan / C Beamish *B*

27<sup>th</sup> June, 2006

Mr. Brendan Tuohy,  
Secretary General,  
Department of Communications, Marine & Natural Resources,  
Leeson Lane,  
Dublin 2

RECEIVED IN SECRETARIAT  
10 JUN  
DEPARTMENT OF  
COMMUNICATIONS, MARINE  
AND NATURAL RESOURCES

Dear Brendan,

At our Board meeting on Thursday, 15<sup>th</sup> inst. our CEO, John O'Connor, advised the Board that you had committed to chairing a meeting on addressing the sea trout/sea lice/salmon aquaculture issue and that, as a first step, you intended inviting appropriate interests from the State Agencies involved in these areas to meet with you and your officials to discuss the matter.

This is an area I have taken a keen interest in since my appointment as Chairman last July when John O'Connor brought to my attention what he considered at that time to be a matter of concern where the seven Regional Fisheries Boards had decided to issue a strong public statement on the serious adverse impacts on wild sea trout stocks of inadequate sea lice control on a number of farms along the western seaboard. The Regional Boards decided to call on the Minister to take specific actions to address the matter. Being newly appointed I decided that other options should first be considered to address this issue rather than bringing it into the public arena. I secured the full support of my Board in this regard. I then (with my Board) met with the then Minister, Pat "the Cope" Gallagher TD, last October, and following discussions, he agreed to set up the Sea Lice Review Group. Unfortunately, that Group ran into difficulty and is now suspended.

I am very aware of your heavy workload across a wide brief and greatly appreciate your willingness and commitment to working with us to bring order and progress to this difficult situation which long predates your term of office. I am confident that, working with you, we can bring a satisfactory and balanced resolution to this matter. You can be assured of my full support and that of my Board and CEO.

Yours sincerely,

*David Mackey*  
David Mackey  
Chairman

RECEIVED IN SECRETARY  
GENERAL  
04 JUL 2006  
DEPAR  
COMMUNIC

Swords Business Campus  
Swords  
Co. Dublin  
Tel: 01-8842600

Record No 7

----- Original Message -----

From: Ken Whelan <ken.whelan@marine.ie>  
To: Frank Sheridan; John Quinlan  
Cc: Peter Heffernan <peter.heffernan@marine.ie>; John Joyce <John.Joyce@marine.ie>;  
Micheal O'Cinneide <Micheal.O'Cinneide@marine.ie>  
Sent: Fri Oct 06 21:22:27 2006  
Subject: RE: Inshore Ireland - sea trout /sea louse debate

Dear Frank and John

Please find below an email from Gery Flynn, Editor of Inshore Ireland which was widely circulated this week. Gery has been in touch with John Joyce of our communications section seeking a response from MI. Given the recent meeting convened by the Secretary General and his express wish that those attending avoid any public comments on the sea lice / sea trout issue until the group had completed its work I would welcome a discussion on how best to deal with Gery's request. I am attending the Aquaculture Forum on Monday afternoon and we might get a chance to discuss following the meeting.

Ken

-----Original Message-----

From: John Joyce  
Sent: 05 October 2006 15:52  
To: Ken Whelan  
Cc: Peter Heffernan  
Subject: FW: Inshore Ireland - sea trout /sea louse debate

Hi Ken,

This just in from Gery Flynn.

If you would like to discuss a response I am available in Galway on 091 387433 or on the mobile 087 2250871.

All the best

John

---

From: Gery Flynn [mailto:flynn@inshoreireland.com]  
Sent: 05 October 2006 15:34  
To: John Joyce  
Subject: Inshore Ireland - sea trout /sea louse debate

From: Gery Flynn flynn@inshoreireland.com  
Date: Thu, 05 Oct 2006

The last two issues of Inshore Ireland have reported on the complexities surrounding the sea trout/salmon louse debate.

The next issue, which will be published on October 19, will attempt to summarise the main findings so far, and highlight some of the many questions that remain unanswered.

In order to stimulate civilized and informed debate Inshore Ireland invites you to respond to some or all of the following questions.

The questions and invited responses will be published in future articles on the subject:

1. Do you think that continuation of the sea lice monitoring programme on Irish salmon farms is warranted?
2. Do you think that continuation of the sea lice monitoring programme on sea trout post-smolt in estuarine / lower river reaches is warranted?
3. Do you think that the by-law prohibiting the retention of rod-caught and commercially-caught sea trout in the west of Ireland is warranted?
4. What is the current status of sea trout in the west of Ireland?
5. If you believe that sea lice from salmon farms infest wild salmonids in Ireland, where do you think this infestation occurs now?
6. Do you believe that all Irish salmon farms are guilty of causing the sea lice infestation of wild fish, or could it be that geographic and hydrographic circumstances cause some farms to infest and others to avoid it?
7. If you believe that such infestations occur in or near to river estuaries as wild smolts emerge, how do you think that the parasites get there from the farms?
8. A list of over 40 reasons is offered for the collapse of wild salmonid stocks, in particular sea trout. What in your view have been the five most damaging, and in order?
9. Some feel that the "statistical hypothesis" did much to incriminate salmon farms in the sea trout collapse. Others disagree. What is your own view of the status of the hypotheses today?

Deadline TUESDAY 10 OCTOBER

Gery Flynn  
features editor  
Inshore Ireland  
+353 91 844 822  
+353 85 747 57 97

*Rockfield, Athens, Co. Galway*

Disclaimer:

This electronic message contains information (and may contain files), which may be privileged or confidential. The information is intended to be for the sole use of the individual(s) or entity named above. If you are not the intended recipient be aware that any disclosure, copying, distribution or use of the contents of this information and or files is prohibited. If you have received this electronic message in error, please notify the sender immediately.

This is also to certify that this mail has been scanned for viruses.

Á eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte eise) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na daoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le h-aghaidh an duine/na daoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an eachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, caipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an eachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an eachtaireacht ar an eolas láithreach.

eimhnítear leis seo freisin nár aimsíodh víreas sa phost seo tar éis a scanadh.

**From:** Michael Harte [mailto:michealmacairt@eircom.net]  
**Sent:** 16 January 2008 12:30  
**To:** Aidan Dunning  
**Subject:** RE: Reply to letter of 21-9-07 Sea Lice Control

Record No 8

---

**From:** Michael Harte [mailto:michealmacairt@eircom.net]  
**Sent:** 06 December 2007 12:45  
**To:** 'aidan.dunning@dcenr.gov.ie'  
**Subject:** Reply to letter of 21-9-07

Dear Secretary General, as you can see, we sent this follow-up letter to our meeting with the then Sec. General last Sept. We did not receive any reply to date. However, a lot has changed on your side since so we are resubmitting same so as to enquire about any changes etc. that may have been put in place re. the control of sea lice on the salmon in the cages. Yours sincerely- Michael Harte.

---

*Save Our Sea*

*Trout*

*Harte,*

*Droum,*

*Mr. Brendan Touhy,  
Secretary General.*

*Leap,  
Co. Cork.  
(028)34710  
21-9-2007  
michealmacairt@eircom.net*

*R.E. "High Level Group" set up to review Sea Lice Control  
on Irish Salmon Farms.*

Dear Secretary General,  
As you recall, you very kindly invited us in S.O.S. to a meeting with you and some of your officials in your Department to discuss the ongoing problems of the lack of control of sea lice levels on Irish salmon farms back on the 16<sup>th</sup>. of April 2007.

This was, in our view, a very timely and fruitful meeting in which it was acknowledged by both sides that lice control was indeed far from what it should be and that serious action needed to be taken to reverse this.

You explained that the terms of reference of the "High Level Group" set up to deal with the problem, and which you yourself were chairing, were, "to review, in the light of experience, the operation of systems and processes for controlling sea lice levels at marine fish farms, to identify any necessary

21/01/2008

*changes and set out an action plan with specific timeframes for implementation of such changes”.*

Therefore, we would like to know if this review has taken place, what necessary changes have been identified, whether an action plan has been set out, and the timeframes attached to the whole process.

As representatives of anglers, fishery owners and environmentalists who have campaigned for over fifteen years and more to have the damage that has been done to the wild stocks of salmon and sea trout from the excess levels of sea lice from the farmed salmon in the cages reversed, we genuinely, and without any further agenda, wish to see this problem resolved speedily for the sake of these priceless, wild, indigenous stocks of salmon and sea trout.

We greatly appreciate your time and your clear understanding of the issues involved and look forward to hearing from you soon on this issue.

Yours sincerely, \_\_\_\_\_ Michael Harte. (Secretary – S.O.S.)

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.503 / Virus Database: 269.16.15/1173 - Release Date: 05/12/2007 21:29

Dear Secretary General, we are again resubmitting our enquiry as to the status of any progress that has been made on the issue of a review of the effectiveness of sea lice control on Irish salmon farms. The original letter was sent on the 21st. of September, 07, and the above e.mail was sent on the 6th. of December, 07. We await any form of reply.  
Best wishes- Michael Harte- 16-1-2008.

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.516 / Virus Database: 269.19.4/1227 - Release Date: 16/01/2008 01:40

FAO  
Observations  
For Action  
For Follow up  
For Information  
CC.  
Date

Record No 9

**SAVE OUR SEA TROUT**

*Mr. Stenson  
A short briefing note is needed. We should seek to relaunch this inter-departmental after next week. west*

Michael Harte,  
Droum,  
Leap,  
Co. Cork.  
(028)34710  
21-9-2007

[michealmacairt@eircom.net](mailto:michealmacairt@eircom.net)

*Ms Dea  
you might locate relevant papers and we can arrange reproduction of notes to Mr. Brendan Fogarty, Secretary General.  
S.G. and  
request for advancing*

*with DARE  
perhaps by way of  
the hour*

R.E. "High Level Group" set up to review Sea Lice Control on Irish Salmon Farms.

*minutes*  
Dear Secretary General,

As you recall, you very kindly invited us in S.O.S. to a meeting with you and some of your officials in your Department to discuss the ongoing problems of the lack of control of sea lice levels on Irish salmon farms back on the 16<sup>th</sup>. of April 2007.

This was, in our view, a very timely and fruitful meeting in which it was acknowledged by both sides that lice control was indeed far from what it should be and that serious action needed to be taken to reverse this.

You explained that the terms of reference of the "High Level Group" set up to deal with the problem, and which you yourself were chairing, were, "to review, in the light of experience, the operation of systems and processes for controlling sea lice levels at marine fish farms, to identify any necessary changes and set out an action plan with specific timeframes for implementation of such changes".

Therefore, we would like to know if this review has taken place, what necessary changes have been identified, whether an action plan has been set out, and the timeframes attached to the whole process?

As representatives of anglers, fishery owners and environmentalists who have campaigned for over fifteen years and more to have the damage that has been done to the wild stocks of salmon and sea trout from the excess levels of sea lice from the farmed salmon in the cages reversed, we genuinely, and without any further agenda, wish to see this problem resolved speedily for the sake of these priceless, wild, indigenous stocks of salmon and sea trout.

We greatly appreciate your time and your clear understanding of the issues involved and look forward to hearing from you soon on this issue.

Yours sincerely,

*Michael Harte*

Michael Harte. (Secretary - S.O.S.)

RECEIVED IN SECRETARY GENERAL'S OFFICE  
26 SEP 2007  
DEPARTMENT OF COMMUNICATIONS, ENERGY

*Mr M Brennan  
R. Collins*

**SOS Briefing Document for meeting with Secretary General of the  
Dept. of Communications, Marine & Natural Resources on 16/4/2007**

**DESTRUCTION OF THE WILD FISH RESOURCE BY SALMON FARMS**

- Sea lice from salmon farms are destroying wild salmon and sea trout
- The body of evidence from Ireland, Scotland, Canada & Norway is now incontrovertible
- The evidence is fully accepted by the Marine Institute, ICES, NASCO and the EU
- New CFB research shows the impact on wild salmon to have been greatly underestimated
  
- The situation is clearly in breach of the EU Habitats Directive
- Ireland has 32 salmon river SACs, many along the affected west-coast
- There are also SACs for *margaritifera* mussels that depend on salmon & sea trout runs
- There is no point in protecting salmon in freshwater if they are then destroyed in estuaries
- The logic is identical to that of the drift net issue
- Ireland is also a signatory (via the EU) to the Williamsburg Resolution of NASCO, which, inter alia, requires the classification of rivers and the designation of wild salmon sanctuaries
- The latest EU aquaculture policy framework envisages the movement of farms offshore
- Complaints to the EU have now been officially registered and will be vigorously pursued
  
- The problem is one of unwise farm location and ineffective regulation and enforcement
- The lice control system simply does not work
- Monitoring of Irish farms may be extensive but effective sanctions are not applied
- Most Irish salmon farms frequently breach the prescribed lice limits, many repeatedly
- These limits are anyway (demonstrably) set too high and should be per bay not per fish
- Breaches consistently occur throughout the critical spring period
- This critical period has anyway been defined too narrowly, defying the Whitaker Report
- While farms may be instructed to treat, ineffective treatments are not punished
- Constant treatment success is required (but appears unachievable)
- Just one slip-up in treatment can cause (and has caused) a multi-generation stock collapse
- Chemical resistances in sea lice are inevitable over relatively short time periods
- NASCO concerns about fishfarm escapees are also not being adequately addressed
  
- The industry is propped up by grant aid, with very dubious economic sustainability
- Almost all farms have suffered multiple-insolvencies, with frequent ownership changes
- Employment benefits are minor (c. 250FTEs) and, for the most part, of poor quality
- The global competitive position of the Irish industry is weak, with survival questionable
- But the impact on tourism and Ireland's image has been extensive
- The farm product is much criticized for its quality, with growing consumer antipathy
- The new drive for organic status is incompatible with current chemical dependence

**WHAT IS NEEDED**

**The Solution**

- The phased relocation of farms away from SAC river estuaries, or to closed containers

**Immediate action**

- A freeze on development or expansion of farms in or near SAC river estuaries
- A block on further grant aid to farms in or near SAC river estuaries
- Effective application of meaningful & deterrent penalties against all offending farms
- A major revision of the lice limits & control regime, viewed on a whole-bay basis



SAVE OUR SEA TROUT

(A)

Appendices

16-4-2007

to

*Save Our Sea Trout*

*Submission to the Department of Communications,  
Marine and Natural Resources  
Concerning*

*Poor Lice Control on Irish Salmon Farms*

*and the resultant*

*Damage to the Wild Stocks of  
Sea Trout and Salmon in those areas.*

- (A) Cover Page:
- (B) Background:
- (C) Summary:
- (D) Lice Results – 2002-2006 – A Comparison:
- (E) Lice Results – 2002-2006 – ~~At Farms that Repeatedly Breach~~
- (F) “Critical Period” 2005 – ~~Farms that Repeatedly Breach~~
- (G) “Critical Period” 2006 – ~~Farms that Repeatedly Breach~~
- (H) High “Total” Lice Counts for 2005:
- (I) High “Total” Lice Counts for 2006:
- (J) Analysis of all Lice Counts for all Year Classes in the Year 2005:
- (K) Analysis of all Lice Counts for all Year Classes in the Year 2006:
- (L) Analysis of Lice Compliance for all Bays for 2005 & 2006:

## Background:

### Lice from the Salmon Farms:

It has now been established beyond any reasonable doubt that it is the explosion of sea lice, above and beyond the natural background level that has devastated the sea trout and salmon smolts in salmon farming areas.

The lice are produced by the hundreds of thousands of artificially bred and reared farmed salmon in the cages around our coast

The lice explosion results in the wild salmon and sea trout smolts being literally eaten alive, especially during the "Critical Spring Period" of March, April and May.

\*Unless the lice from the farms is reduced to that approaching pre-salmon farming times, then the future of both the salmon and sea trout in these areas will remain perilous.

Lice Control is now at a FIVE YEAR HIGH in spite of the presence of the Department's own "Protocols" and A.L.A.B. licences which advocate zero/near zero egg bearing lice in the "Critical Spring Period.

*In Just 3 months of the "Critical Period" up to 60% of all breaches take place as opposed to only 40% in 9 months "Outside" of this.*

***Many OVIGEROUS lice counts in the "Critical Period" exceed the "Trigger Level" by up to 24 times that permitted!***

### A Crisis:

The lice control crisis, which is the greatest problem facing the Irish salmon farming industry and the Department of the Marine, is something that has been with us from the inception of the industry in the late 80s.

Any suggestion that it is only in recent years that lice control has become a problem is completely untrue as the lice statistics don't lie with a total lack of enforcement of the present inadequate "Protocols" as published by the Department.

### Remember These?

*"It is not known whether there is any level of lice, above that occurring in natural, farm free conditions, which does not constitute a danger to sea trout."*

*"If the sea trout is to be saved, the virtual elimination of lice, on and in the vicinity of sea farms must be a constant priority....."*

*"Sea Trout Task Force"  
(Dr. Ken Whitaker.-1993.)*

# *A Summary of Lice Control for 2005/2006*

## *Lice Control—A Five Year Comparison:*

Lice control was at its worst in the “Critical Period—a time when it is supposed to be at its best!  
It was up to 5 times worse in the “Critical Period.”

There were an average of 54 breaches in every 3 mths. “Critical Period”, or 18 per month which = 60% of all failures.

As opposed to this, there were only an average of 37 breaches in each 9 mths. “Outside”, or 4 per. Month = 40% of all failures.

## *Analysis of all Lice Counts in the year*

|  |                    |                         |                 |
|--|--------------------|-------------------------|-----------------|
| The failure rates for the last two years were- | <i>Whole Year:</i> | <i>Critical Period:</i> | <i>Outside:</i> |
| 2005   | 31%                | 40%                     | 25%             |
| 2006   | 25%                | 30%                     | 20%             |

Two-Sea-Winter Fish failed almost every single count-nearly a 100% failure rate.

Fish of one-sea-winter and more have an especially terrible lice control record.

They had an average of a 50% failure rate, with it rising to 70, 80, 90 and even up to 100% at times.

Lice control was vary good in the South-West in 05 at 1.53%, but rose sharply to almost 20% in 06.

## *Farms in the “Critical Period” for 2005/06:*

Up to 60% of all lice breaches take place in just 3 months of the “Critical Period” making it the worst period of the year.

In 2005, we see that 5 out of 11 fail every single lice count in the “Critical Period”, with others at 66 and 80%.

In 2006, failure rates reach anything from 50% to 66 + 81 + 83 + 90 & 100%.

Over the two years, Daoinish and Marine Harvest fail every single lice count in the “Critical Period.”

Many ovigerous counts exceed the “Trigger Levels” or A.L.A.B. licences by a factor of 5,6,8,9,10,13,15,19, 21 and even 24 times above that permitted.

## *Total Lice Counts over “10” in the “Critical Period.” + over “20” “Outside”:*

Some examples of levels that exceed “10” are— 10.29– 11.83– 20.57– 22.22– 28.97– 36.12– 40.33– 42.47– with a high of 55.55.

Yet, the “Protocols” say that treatment is “triggered” in the “Critical Period” when mobile lice are “high...”  
However, it seems almost certain that this is never observed.

Total Lice Counts over 20 “Outside” of the “Critical Period.”— 31.04– 38.88– 41.00– 44.68– 50.18– 64.40– 77.64– 87.16– 106.88– 107.55– with a high of 108.76.

The “Protocols” say nothing whatsoever about high mobile lice “Outside” of the “Critical Period” so is there any level above which they should not go and what of keeping control of lice, esp. in the autumn/winter period, as the “Protocols” advocate?

**Lice Results:  
2002–2006  
A Five Year Comparison:**

**Breaches of Licence or  
Protocols.**

(D) ✱

| Month:        | 2002 | 2003 | 2004 | 2005 | 2006 |
|---------------|------|------|------|------|------|
| January:      | 4    | 2    | 0    | 10   | 2    |
| February:     | 1    | 3    | 4    | 6    | 4    |
| March:        | 19   | 29   | 24   | 23   | 19   |
| April:        | 8    | 13   | 20   | 19   | 16   |
| May:          | 16   | 21   | 11   | 15   | 17   |
| June:         | 1    | 4    | 3    | 4    | 4    |
| July:         | 2    | 5    | 2    | 4    | 5    |
| August:       | 2    | 6    | 2    | 7    | 6    |
| September:    | 5    | 4    | 4    | 6    | 5    |
| October:      | 5    | 3    | 6    | 7    | 4    |
| November:     | 4    | 4    | 9    | 4    | 5    |
| December:     | 3    | 5    | 0    | 5    | 5    |
| <b>Total:</b> | 70   | 99   | 85   | 110  | 92   |

**The WORST time  
of the year for lice  
control is in the  
“CRITICAL  
PERIOD.”**

**It is SUPPOSED  
to be the BEST!**

**Contradiction!**  
There are, on average, 18 breaches per month in the “Critical Period” and only around 4 per month “Outside” of this time!

**Contradiction!**  
Strange, but true—in spite of the fact that the “Critical Period” lasts for only 3 months of the year, it still accounts for 60% of all lice breaches. The other 40% take place in the other 9 months.

**Fact**  
Lice control is almost 5 times worse in the “Critical Period” than “Outside.”  
  
Yet the Department’s own “Protocols tell us that lice burdens should be “... as close to zero as practicable on all fish, that are to be overwintered. This is fundamental to achieving zero/near zero egg bearing lice in spring.”

**Breaches in the Critical Period & Outside:**

| Year:                         | 2002:       | 2003:   | 2004:        | 2005:        | 2006:         | Average: |
|-------------------------------|-------------|---------|--------------|--------------|---------------|----------|
| <b>Critical Pe-<br/>riod:</b> | 43<br>(*For | 63<br>3 | 55<br>Months | 57<br>Only!) | 52            | 54       |
| <b>Outside:</b>               | 27<br>(*For | 36<br>9 | 30<br>Months | 53<br>in     | 40<br>Total.) | 37       |
| <b>Total:</b>                 | 70          | 99      | 85           | 110          | 92            | 91       |

**When Lice Control should be at its BEST it is actually at its WORST:**



**"Critical Period" 2005:**

(F)

**Farms that have REPEATEDLY BREACHED  
Department & or A.L.A.B. licences.**

| Breach Level: | Salmon Farm:                            | March:                  | April:                  | May:                   | Failed:    |
|---------------|---|-------------------------|-------------------------|------------------------|------------|
| (E) 0.3       | Kilkieran:<br>(Muir Gheal-Cnoc)         | 0.39+0.50               | 0.67+0.29<br>(x2)       | 0.10+6.52<br>(x21)     | 4/6 = 66%  |
| (D) 0.3       | Kilkieran:<br>(Daoinish)                | 2.08+2.22<br>(x7) (x7)  | 2.68+1.02<br>(x9) (x3)  | 0.64+1.36<br>(x2) (x4) | 6/6 = 100% |
| 0.3           | Kilkieran:<br>(Eisc Ui. Flath)          | 0.68+0.14<br>(x2)       | 2.00+2.03<br>(x6) (x6)  | 0.16+0.55              | 4/6 = 66%  |
| 0.5           | Mannin Bay:<br>(Corhounagh)             | -----                   | 1.82+2.10<br>(x3) (x4)  | 2.50+2.62<br>(x5) (x5) | 4/4 = 100% |
| 0.5           | Ballinakill:<br>(Fraochoilean)          | 0.61+2.12<br>(x2) (x4)  | 2.00+1.30<br>(x4) (x2)  | 3.64+1.09<br>(x7) (x2) | 6/6 = 100% |
| (G) 0.3       | Killary:<br>(Rosroe.)                   | 0.50+0.71               | 0.36+ --                | 0.13+0.02              | 3/5 = 60%  |
| (H) 0.5       | Clew Bay:<br>(Clare Island-<br>Portlea) | 0.33+0.51               | 1.00+ --<br>(x2)        | 1.49+2.08<br>(x3) (x4) | 4/5 = 80%  |
| 0.5           | Clew Bay:<br>(Seastream)                | 4.10+5.07<br>(x8) (x10) | 2.25 --<br>(x4)         | 2.00+3.24<br>(x4) (x6) | 5/5 = 100% |
| (J) 0.5       | Mulroy:<br>(Cranford A)                 | 1.55+1.10<br>(x3) (x2)  | 0.61+1.55<br>(x3)       | 0.44+0.24              | 4/6 = 66%  |
| (L) 0.5       | Mulroy:<br>(Millstone.)                 | 2.38+2.07<br>(x4) (x4)  | 1.64+1.18<br>(x3) (x2)  | 0.40+0.36              | 4/6 = 66%  |
| (M) 0.3       | L. Swilly:<br>(Marine Harvest)          | 6.29+3.33<br>(x20)      | 3.39+0.75<br>(x11) (x2) | 1.38+0.50<br>(x4)      | 6/6 = 100% |

**Terrible Lice Control in the "Critical Period."**

- (i) Most farms have failed almost every single lice count in 2005.
- (ii) Out of 11 farms, 5 of them have failed in 100% of their lice checks in the "Critical Period."
- (iii) For example, Daoinish and Eisc Ui Flatharta in Kilkieran; Corhounagh in Mannin Bay; Fraochoilean in Ballinakill; Seastream in Clew Bay and Marine Harvest in Lough Swilly have not passed a lice count between them.
- (iv) Many ovigerous counts were 5, 6, 8, 9, 10, and even up to 21 times above their "trigger levels" as permitted by the "Protocols" or their A.L.A.B. licences.

**"Critical Period" 2006:**

(G)

**Farms that have REPEATEDLY BREACHED  
Department & or A.L.A.B. Licences.**

| Breach Level:<br>(Farm) | Salmon Farm:                       | March:                 | April:                 | May:                    | (05)  | 06  | Total:         |
|-------------------------|------------------------------------|------------------------|------------------------|-------------------------|-------|-----|----------------|
| (A) 0.3                 | Bantry Bay:<br>(Cuan Baoi)         | 0.61+1.60<br>(x2) (x5) | 0.00+0.03              | 0.07 + 0.37             | -     | 3/6 | 3/6=<br>50%    |
| (B) 0.5                 | Bantry Bay:<br>(Roancarrig-S1/2)   | 2.63+2.91<br>(x5) (x6) | 1.67+0.46<br>(x3)      | 0.70+0.73               | -     | 5/6 | 5/6=<br>83%    |
| (C) 0.5                 | Roancarrig:<br>(Salmon-05)         | 0.00+0.04              | 0.56+0.11              | 0.50+1.70<br>(x3)       | -     | 3/6 | 3/6=<br>50%    |
| (D) 0.3                 | Kilkieran:<br>(Daoinish)           | 1.00+0.58<br>(x3)      | 0.34+1.82<br>(x6)      | 1.66+7.44<br>(x5) (x24) | (6/6) | 6/6 | 12/12=<br>100% |
| (E) 0.3                 | Kilkieran:<br>(Muirgheal-Cnoc)     | 1.39+0.21<br>(x4)      | 0.23+0.96<br>(x3)      | 1.15+4.47<br>(x3) (x15) | (4/6) | 4/6 | 8/12=<br>66%   |
| (F) 0.5                 | Mannin Bay:<br>(Hawk's Nest)       | 0.19+ ---              | 0.00+0.33              | 0.81+2.71<br>(x5)       | -     | 2/6 | 2/6=<br>33%    |
| (G) 0.3                 | Killary:<br>(Rosroe)               | 0.19+5.70<br>(X19)     | 3.85+0.06<br>(x13)     | 0.29+0.13               | (3/5) | 2/6 | 5/11=<br>45%   |
| (H) 0.5                 | Clare Island:<br>(Portlea)         | 0.21+0.97              | 1.25+1.66<br>(x2) (x3) | 0.14+0.11               | (4/5) | 3/6 | 7/11=<br>45%   |
| (I) 0.5                 | Clare Island:<br>(Seastream-Outer) | 0.77+1.18              | 0.78+1.63              | 0.21+ ---               | (5/5) | 4/5 | 9/10=<br>90%   |
| (J) 0.5                 | Mulroy Bay:<br>(Cranford A)        | 1.53+2.83<br>(x3) (x5) | 2.30+1.75<br>(x4) (x3) | 1.46+3.92<br>(x3) (x8)  | (4/6) | 6/6 | 10/12=<br>83%  |
| (K) 0.5                 | Mulroy Bay:<br>(Moross I)          | 1.27+1.02<br>(x2) (x2) | 0.40+ ---              | 0.33+ ---               | -     | 2/4 | 2/4=<br>50%    |
| (L) 0.5                 | Mulroy Bay:<br>(Millstone)         | 5.38+ ---<br>(x10)     | 0.59+1.47              | 0.77+1.24<br>(x2)       | (4/6) | 5/5 | 9/11=<br>81%   |
| (M) 0.3                 | Lough Swilly:<br>(Marine Harvest)  | 0.32+ ---              | 0.37+1.06<br>(x3)      | 2.75+1.88<br>(x9) (x6)  | (6/6) | 5/5 | 11/11<br>100%  |

**Terrible Lice Control in the "Critical Period."**

- (i) Most of these farms have **failed to pass a lice test** for the last two years.
- (ii) **None** of them have gone even remotely close to complying with what the "**Protocols**" advocate when they say that they should be "**.....achieving zero/near zero egg bearing lice in spring.**"
- (iii) For example, **Daoinish** in Kilkieran and **Marine Harvest** in Lough Swilly have **failed 100%** of their lice counts.
- (iv) Also, **Seastream** in Clew Bay have **failed 90%** of their lice checks; **Cranford A** in Mulroy have **failed 83%** and **Millstone**, also in Mulroy, have **failed 81%** of the lice counts.

## High "TOTAL" Lice Counts for 2005:

At Counts over 10 in the "Critical Period" and greater than 20 "Outside" of this.

**(H)**

| Salmon Farm:                       | Jan:           | Feb: | March          | April:         | May:           | June: | July: | Aug:  | Sept: | Oct:   | Nov:   | Dec:  |
|------------------------------------|----------------|------|----------------|----------------|----------------|-------|-------|-------|-------|--------|--------|-------|
| Kilkieran:<br>(Daoinish)           |                |      |                |                |                |       |       |       |       |        | 22.83  |       |
| Kilkieran:<br>(Muirgheal-Cnoc)     |                |      | 28.97          |                | 36.12          | 21.87 |       |       |       |        |        |       |
| Kilkieran:<br>(E. Ui Fla.-Ardmore) |                |      | 23.16          |                |                |       |       |       |       |        |        |       |
| Mannin Bay:<br>(Corhounagh)        |                |      |                |                | 17.83          |       | 24.03 |       |       | 20.25  |        |       |
| Mannin Bay:<br>(Hawk's Nest)       |                |      | 11.83<br>15.83 |                |                |       |       |       |       |        |        |       |
| Ballinakill:<br>(Fraochoilean)     |                |      |                | 43.98<br>10.62 |                |       | 24.07 |       |       |        |        |       |
| Killary:<br>(Rosroe)               |                |      |                |                |                |       |       | 25.45 |       |        |        |       |
| Clew Bay:<br>(Portlea)             |                |      |                |                | 10.29<br>10.83 |       |       |       |       |        |        |       |
| Clew Bay:<br>(Seastream-Inner)     | 35.42          |      | 30.67          | 11.71          | 18.03          |       |       |       |       |        |        |       |
| Mulroy Bay:<br>(Cranford A)        |                |      |                |                |                |       |       |       | 64.40 |        | 106.88 | 41.00 |
| Mulroy Bay:<br>(Millstone)         |                |      |                |                |                |       |       | 28.56 |       | 23.00  | 13.85  |       |
| Lough Swilly:<br>(Marine Harvest)  | 21.85<br>28.62 |      | 16.41          |                |                |       |       |       |       | 107.55 | 108.76 | 62.04 |

### Comment:

(a) "Total" lice counts are extremely bad in the "Critical Period."

There are 14 counts of over "10", with many ranging from e.g. 10.29 + 15.83 + 17.83 + 18.03 + 28.97 + 36.12 and even up to 43.98!

(b) The "Protocols" say that in the "Critical Period" "Where numbers of mobile lice are high, treatments are triggered even in the absence of egg bearing females." Why do the "Protocols" not give any figure as to when treatment should be "triggered" for mobile lice?

No one actually knows, not even the salmon farmers, when this "treatment" should begin!

(c) Also, figures reach some amazing heights "Outside" of the "Critical Period."

Some examples are; 20.25 + 25.45 + 41.00 + 64.40 + 62.04, and three in excess of 100, = 106.88 + 107.55 & 108.76!

(d) In spite of the very high figures above, the "Protocols" completely ignore the problem of high mobile "Outside" of the "Critical Period" and no figure of any kind is given to indicate when action should be taken.

**High "TOTAL" Lice Counts for 2006:**  
**All Counts of over 10 in the "Critical Period" and greater than 20 "Outside" of this.**

**(1)**

| <u>Salmon Farm:</u>                              | Jan: | Feb: | March          | April:         | May:           | June: | July: | Aug:           | Sept: | Oct:  | Nov:  | Dec:  |
|--|------|------|----------------|----------------|----------------|-------|-------|----------------|-------|-------|-------|-------|
| <b>Bantry Bay:</b><br><b>(Roancarrig)</b>        |      |      | 11.06<br>20.57 |                |                |       |       |                |       |       |       |       |
| <b>Kilkieran Bay:</b><br><b>(Daoinish)</b>       |      |      | 29.02          | 10.06          | 13.86<br>22.22 |       |       |                |       | 26.47 | 27.05 |       |
| <b>Kilkieran:</b><br><b>(Cnoc)</b>               |      |      | 12.47          | 17.25<br>26.42 |                |       |       |                |       |       |       |       |
| <b>Kilkieran:</b><br><b>(Muir Gheal)</b>         |      |      |                |                |                | 22.31 |       |                |       |       |       |       |
| <b>Mannin Bay:</b><br><b>(Corhounagh)</b>        |      |      |                |                | 18.41          |       |       |                | 44.68 |       | 85.93 | 87.16 |
| <b>Mannin Bay:</b><br><b>(Hawk's Nest)</b>       |      |      |                |                |                |       |       |                |       |       | 50.18 |       |
| <b>Ballinakill Bay:</b><br><b>(Fraochoilean)</b> |      |      |                |                |                |       |       |                |       |       |       | 20.71 |
| <b>Killary Harbour;</b><br><b>(Rosroe)</b>       |      |      | 14.95<br>42.47 | 40.33          | 55.55<br>16.21 |       | 23.15 | 40.37          |       |       |       |       |
| <b>Mulroy Bay:</b><br><b>(Cranford A)</b>        |      |      |                |                | 12.46          |       |       |                |       | 26.45 | 31.04 |       |
| <b>Mulroy Bay:</b><br><b>(Millstone)</b>         |      |      |                |                |                |       |       | 15.24<br>20.92 |       | 24.18 |       |       |
| <b>Lough Swilly;</b><br><b>(Marine Harvest)</b>  |      |      |                |                |                |       |       | 25.88          | 27.47 | 38.88 | 51.61 | 77.64 |

**Comment:**

- (a) "Total" lice counts are particularly bad in the "Critical Period" and also "Outside" of this in the autumn.
- (b) In the "**Critical Period**" "total" counts regularly reach levels of e.g. 21.64 + 22.22 + 29.02 + 40.33 + 42.42 & even up to 55.55!
- (c) But the "Protocols" say that, "Where numbers of mobile lice are high, treatments are triggered even in the absence of egg bearing females." Amazingly, no actual figure is give as to when treatment should be "triggered."
- (d) "**Outside**" we see levels in the autumn of e.g. 31.03 + 38.88 + 40.37 + 44.68 + 50.18 + 77.64, and reaching a high of 87.16!
- (e) Yet, in contradiction to the above, the "Protocols" tell us that, "One important aspect of targeted treatments is the carrying out of autumn/winter treatments to reduce lice burdens to as close to zero as practicable on all fish which are to be over-wintered."
- (f) This is clearly not happening with a serious lice reservoir building up in the autumn and winter which the "Protocols" say should not happen.
- \* Either "TOAL" lice counts mean something, or they don't. If they do, then take some action of foot of them. If they don't, then why go to the trouble of counting them?**

**An Analysis of all Lice Counts for all Year  
Classes in the Year 2005:**

(J)

|       | <u>Class of Fish:</u>      | <u>(A) Whole Year:</u> |       | <u>(B) Critical Period:</u> |       | <u>(C) Outside:</u> |       |
|-------|----------------------------|------------------------|-------|-----------------------------|-------|---------------------|-------|
| (A)   | <i>All Classes:</i>        | 31%                    | (30)  | 42.80%                      | (40)  | 22.66%              | (25)  |
| (i)   | South West:                | 1.53%                  | (0)   | 4.16%                       | (40)  | 0%                  | (0)   |
| (ii)  | West:                      | 37.57%                 | (40)  | 60.31%                      | (60)  | 18.50%              | (20)  |
| (iii) | North West:                | 40.49%                 | (40)  | 38.00%                      | (40)  | 37.14%              | (40)  |
| (B)   | <i>Atlantic Salmon 03:</i> | 91.66%                 | (90)  | 100%                        | (100) | 85.71%              | (85)  |
| (i)   | South West:                | 50%                    | (50)  | 0%                          | (0)   | 50%                 | (50)  |
| (ii)  | West:                      | 100%                   | (100) | 100%                        | (100) | 100%                | (100) |
| (iii) | North West:                | 100%                   | (100) | 0%                          | (0)   | 100%                | (100) |
| (C)   | <i>Atlantic Salmon 04:</i> | 52.21%                 | (50)  | 57.69%                      | (60)  | 46.77%              | (45)  |
| (i)   | South West:                | 4%                     | (4)   | 8.3%                        | (10)  | 0%                  | (0)   |
| (ii)  | West:                      | 63.88%                 | (65)  | 81.25%                      | (80)  | 50.00%              | (50)  |
| (iii) | North West:                | 67.30%                 | (70)  | 66.66%                      | (65)  | 64.28%              | (65)  |
| (D)   | <i>At. Sal. 04 S.1/2s.</i> | 64.28%                 | (65)  | 67.85%                      | (70)  | 57.14%              | (60)  |
| (i)   | South West:                | (No Fish)              | (0)   | (No Fish)                   | (--)  | (No Fish)           | (--)  |
| (ii)  | West:                      | 74.00%                 | (75)  | 88.88%                      | (90)  | 44.44%              | (45)  |
| (iii) | North West:                | 46.66%                 | (45)  | 30.00%                      | (30)  | 57.14%              | (60)  |
| (E)   | <i>Atlantic Salmon 05:</i> | 3.12%                  |       | 0%                          |       | 3.12%               |       |
| (i)   | South West:                | 0%                     |       | 0%                          |       | 0%                  |       |
| (ii)  | West:                      | 3.44%                  |       | 0%                          |       | 3.44%               |       |
| (iii) | North West:                | 4.76%                  |       | 0%                          |       | 4.76%               |       |
| (F)   | <i>At. Sal. 05 S.1/2s.</i> | 10.00%                 |       | 0%                          |       | 12.96%              |       |
| (i)   | South West:                | 0%                     |       | 0%                          |       | 0%                  |       |
| (ii)  | West:                      | 8.16%                  |       | 0%                          |       | 12.90%              |       |
| (III) | North West:                | 17.85%                 |       | 0%                          |       | 27.77%              |       |
| (G)   | <i>Rainbow:</i>            | 11.11%                 |       | 22.22%                      |       | 0%                  |       |

**Why Lice Control was Terrible in 2005!**

- (i) On average, over **30 %** of **all lice counts** were over the "trigger" or licence level in 2005.
- (ii) This rose to almost **43%** in the "**CRITICAL PERIOD.**"
- (iii) **Two-Sea-Winter** fish **failed 100%** of their counts in the "**CRITICAL PERIOD**" and up to **80%+** "**OUTSIDE.**"
- (iv) The **West** and the **North-West** were **especially bad** for the whole year, failing on average 40% of all their lice counts.
- (v) **One-sea-winter + fish** (B,C & D) were the **worst offenders** as they failed an average of 50% of all lice counts, with individual regions failing up to 70, 80, 90, and **even 100%** of inspections.

**Analysis of all Lice Counts for all Year Classes in  
the Year 2006:** (K)

|       | <u>Class of Fish:</u>      | <u>(A)Whole Year:</u> |      | <u>(B)Critical<br/>Period:</u> |       | <u>(C)Outside:</u> |      |
|-------|----------------------------|-----------------------|------|--------------------------------|-------|--------------------|------|
| (A)   | <i>All Classes:</i>        | 25.13%                | (25) | 30.21%                         | (30)  | 20.50%             | (20) |
| (i)   | South West:                | 19.04%                | (20) | 33.33%                         | (35)  | 3.33%              | (5)  |
| (ii)  | West:                      | 19.61%                | (20) | 26.04%                         | (25)  | 13.59%             | (15) |
| (iii) | North West:                | 37.19%                | (40) | 35.84%                         | (35)  | 38.23%             | (40) |
| (B)   | <i>Atlantic Salmon 04:</i> | 50%                   | (50) | 40%                            | (40)  | 60%                | (60) |
| (i)   | South West:                | (No Fish)             | (-)  | (No Fish)                      | (-)   | (No Fish)          | (-)  |
| (ii)  | West:                      | 20%                   | (20) | 25%                            | (25)  | 0%                 | (0)  |
| (iii) | North West:                | 80%                   | (80) | 100%                           | (100) | 75%                | (75) |
| (C)   | <i>Atlantic Salmon 05:</i> | 42.98%                | (45) | 49.15%                         | (50)  | 37.03%             | (40) |
| (i)   | South West:                | 28.57%                | (30) | 50.00%                         | (50)  | 0%                 | (-)  |
| (ii)  | West:                      | 47.72%                | (50) | 56.52%                         | (55)  | 38.09%             | (40) |
| (iii) | North West:                | 44.89%                | (45) | 41.66%                         | (40)  | 48.00%             | (50) |
| (D)   | <i>At. Sal. 05 S.1/2s.</i> | 58.33%                | (60) | 71.87%                         | (70)  | 31.25%             | (30) |
| (i)   | South West:                | 66.66%                | (70) | 83.33%                         | (85)  | 33.33%             | (35) |
| (ii)  | West:                      | 48%                   | (50) | 55.55%                         | (55)  | 28.57%             | (30) |
| (iii) | North West:                | 71.24%                | (70) | 100%                           | (100) | 33.33%             | (35) |
| (E)   | <i>Atlantic Salmon 06:</i> | 1.36%                 |      | 0%                             |       | 1.81%              |      |
| (i)   | South West:                | 0%                    |      | 0%                             |       | 0%                 |      |
| (ii)  | West:                      | 0%                    |      | 0%                             |       | 0%                 |      |
| (iii) | North West:                | 5.88%                 |      | 0%                             |       | 9.09%              |      |
| (F)   | <i>At. Sal. 06 S.1/2s.</i> | 12.63%                |      | 2.38%                          |       | 22.44%             |      |
| (i)   | South West:                | 0%                    |      | 0%                             |       | 0%                 |      |
| (ii)  | West:                      | 9.25%                 |      | 4.00%                          |       | 13.79%             |      |
| (iii) | North West:                | 24.13%                |      | 0%                             |       | 38.88%             |      |
| (G)   | <i>Rainbow;</i>            | 2.32%                 |      | 0%                             |       | 4.34%              |      |

**Why Lice Control was Terrible in 2006!**

- (i)Over 25% of all lice counts ended in failure in 2006..
- (ii)This rose to over 30% in the "Critical Period", with 20% failing "Outside" of this time.
- (iii)Lice control got significantly worse in the South-West in 06 with the "CRITICAL PERIOD" falling from 4% in 05 to 33% in 06.
- (iv)For fish of one-sea-winter and more, (B+C+D) lice control was especially bad as the average failure rate was 46% in the WHOLE YEAR, with 56% in the "CRITICAL PERIOD", and 29% "OUTSIDE."
- (v)Of these classes, "Atlantic Salmon 05, S.1/2s. failed over 70% of its counts in the "CRITICAL PERIOD", and almost 60% for the whole year.
- (vi)Nowhere can any evidence be seen of achieving the much heralded "...zero/near zero egg bearing lice in spring" as the "Protocols" demand.

**An Analysis of Lice Compliance for all Bays for  
2005 & 2006**

(I)

| Bay:                  | <u>Whole Year—Total:</u><br>(No. of Breaches + Percentages) |                | <u>Critical Period:</u> |                | <u>Outside:</u> |                |
|-----------------------|---|----------------|-------------------------|----------------|-----------------|----------------|
|                       | 2005  | 2006           | 2005                    | 2006           | 2005            | 2006           |
| <b>Bantry Bay:</b>    | 1/48 = 2.08%  | 12/63 = 19.04% | 1/18 = 5.55%            | 11/34 = 32.35% | 0/30 = 0%       | 1/29 = 3.44%   |
| <b>Kenmare Bay:</b>   | 0/14 = 0%   | No Counts:     | 0/6 = 0%                | No Counts:     | 0/8 = 0%        | No Counts:     |
| <b>Greatman's:</b>    | 0/6 = 0%  | 1/10 = 10%     | 0/4 = 0%                | 1/2 = 50%      | 0/4 = 0%        | 0/8 = 0%       |
| <b>Kilkieran:</b>     | 22/58 = 37.93%  | 15/60 = 25%    | 14/30 = 46.66%          | 10/31 = 32.25% | 7/28 = 25%      | 5/29 = 17.25%  |
| <b>Mannin:</b>        | 9/25 = 36%  | 7/29 = 24.13%  | 6/12 = 50%              | 3/12 = 25%     | 3/13 = 23%      | 4/17 = 23.52%  |
| <b>Ballinakill:</b>   | 9/16 = 56.25%   | 1/17 = 5.88%   | 6/12 = 50%              | 0/7 = 0%       | 3/13 = 23%      | 1/10 = 10%     |
| <b>Killary:</b>       | 6/16 = 37.50%   | 4/22 = 18.18%  | 3/5 = 60%               | 2/12 = 16.16%  | 3/11 = 27.27%   | 2/10 = 20%     |
| <b>Clew Bay:</b>      | 16/31 = 51.61%  | 11/33 = 33.33% | 9/10 = 90%              | 9/18 = 50%     | 7/21 = 33.33%   | 2/15 = 13.33%  |
| <b>Bealacaragher:</b> | 0/6 = 0%  | 0/27 = 0%      | No Counts:              | 0/14 = 0%      | No Counts:      | 0/13 = 0%      |
| <b>Donegal:</b>       | 2/23 = 8.69%%   | 0/20 = 0%      | 2/12 = 16.66%           | 0/12 = 0%      | 0/11 = 0%       | 0/8 = 0%       |
| <b>Mulroy:</b>        | 29/75 = 38.66%  | 32/87 = 36.78% | 11/32 = 34.37%          | 14/36 = 38.88% | 8/10 = 80%      | 18/51 = 35.29% |
| <b>L. Swilly:</b>     | 14/16 = 87.50%  | 12/14 = 85.71% | 6/6 = 100%              | 5/5 = 100%     | 8/10 = 80%      | 7/9 = 77.77%   |

**Number of Breaches for Bays around our Coast:**

Kilkieran, Mannin, Killary, Clew, Mulroy and Swilly were the worst and most consistent offenders. The bays in the South West, Bantry and Kenmare were good in 05 but Bantry started to deteriorate again in 2006. Kilkieran, with such a large number of farms and such a high concentration of fish had an especially bad record for the last two years. The area around Kilkieran used to have such world renowned sea trout fisheries.

# What Needs To Be Done To Save The Sea Trout:

\*Unless the following issues are addressed, then continuing to count the lice levels on the salmon in the cages will be nothing more than a cosmetic exercise.

## (1) Count Lice on Farms & on Trout:

Continue to monitor sea lice levels on the salmon in the cages and the sea trout in the rivers.

## (2) \*N.B. Whole Bay Lice Levels:

Calculate the whole bay lice levels produced by all the cages in the bay.

## (3) Adjust Lice Limits:

This must be lowered to a level that has no further effect on the sea trout and salmon smolts, etc.

## (4) A Lice Cap:

A lice cap is then established for the bay.

## (5) \*N.B. Lice Levels on Individual Fish-Useless:

Setting lice levels for individual salmon in the cages is totally ineffectual as any progress made will be cancelled out by increased tonnages, and the increased number of salmon this will bring. Having, for example, an ovigerous level of 0.3 for a cage of 200,000 fish is totally different to the lice burden produced from a cage of 800,000 salmon!

## (6) \*N.B. "Zero Ovigerous" in Spring:

All farms must achieve a level of "zero ovigerous" lice in the "Critical Spring" period which is currently, March, April and May.

## (7) Extend the "Critical Period":

This "Critical Spring" period must be extended to allow for fluctuations in the weather and so the timing of the sea trout and salmon smolt runs to sea.

## (8) Autumn & Winter Lice:

A much stricter regime of lice control on the salmon farms must be imposed in the autumn and winter months to reduce the lice reservoir and so give a greater chance of achieving "zero ovigerous" levels in spring.

## (9) One "Treatment Trigger" only—not 0.3 + 0.5:

The "treatment triggers" for ovigerous lice in the "Critical Spring" period in the Department's Protocols should only contain one figure, and not two as present, i.e. 0.3 & 0.5.

## (10) 2.0 "Outside" too High:

The level of 2.0 ovigerous outside of the "Critical Spring" period is much too high and should be lowered in line with whole-bay lice levels.

**(11) No Figure for High Mobile in "Critical Period":**

The "Protocols" say that treatment is also triggered in the spring period if mobile lice levels are high-yet, strangely, no level is mentioned as to when this should happen.

**(12) High Mobile Ignored "Outside" "Cr. Per.":**

Similarly, no level whatsoever is set for treatment of mobile lice outside of the spring period.

**(13) Lice Control Relaxed at Harvesting:**

There should allowance for the relaxation of lice levels during harvesting, as allowed for in the Protocols.

**(14) \*N.B. No Lice Limits actually Exist:**

Lice limits must be set for individual fish in the cages and not "treatment triggers" as set out in the Protocols. In theory it could be argued by a farm, that, in spite of its lice levels being well in excess of eg. 0.3 for all of the "Critical Spring" period, that it had complied with the terms and conditions of the Protocols, and or, its licence, by "activating" treatment at the appropriate time.

**(15) "Standard & Random Cages":**

The averages for the "standard" and "random" cages have been combined and this allows the possibility of not only the non-standard cage to carry twice as much of a lice burden, but all the other cages on the site as well.

**(16) Present Sanctions Inadequate:**

Present sanctions, as set out in the Protocols are totally inadequate as they talk of "peer review", "conditional Fish movement orders" and "accelerated harvest." These must be changed.

**(17) Present Sanctions Never Used:**

Even these inadequate sanctions appear to have never been used by the Department, in spite of continual extremely high lice levels.

**(18) \*N.B. Draw Up Meaningful Sanctions and Use Them:**

Sanctions should be enforced and include such measures as fines, reduced tonnages, loss of phased expansion and other items, up to and including the loss of the licence.

**(19) We Have No Enforcement of Licence Conditions:**

We have no enforcement of present lice conditions as both the Department's own "Protocols" and A.L.A.B. licences are completely ignored, year after year.

**(20) Relocate 20/25km.:**

A serious effort, in line with the scientific findings, must be made to relocate the cages up to 20/25 km. away from the sea trout and salmon rivers.

Markin Record No 10

Exchanges for your information.

Frank  
Read thanks  
Keep record, training in  
diplomacy but gain  
sympathetic to his cause

WJG  
Frank Sheridan  
2/03/06

copy  
for file

WJG  
for file please  
re

Mr. Declan O'Rourke,  
Assistant Principal Officer,  
Coastal Zone Management Division,  
Department of the Marine and Natural Resources,  
Leeson Lane,  
Dublin 2.

2/8/06

**Re: Continuing Lice Problems in Connemara.**

Dear Mr. O'Rourke,

I refer to my letter (to Joe Ryan) of the 9<sup>th</sup> May 2006 and your reply on the 12<sup>th</sup> July 2006 and I appreciate that you have responded to my initial letter. However, serious problems persist at this farm and yet again the sea lice results for the month of July are over the threshold permitted under lice protocols. The persistent failure to control lice is totally unacceptable. If lice were completely under control prior to the winter the massive spring explosion in lice that occurred this year would not have been as severe and the farm would have had a far greater opportunity to control its lice.

The rate of infection coming from the marine environment referred to in your letter is not an acceptable argument as the number of wild fish in the area is only a tiny fraction of the population in the two salmon farms. This is due to the virtual extinction of the wild sea trout due to sea lice from marine salmon farms and the very low number of wild salmon due to poor marine survival part of which is also due to lice from marine salmon farms.

Salmon farms are licensed operators in the waters of the state. It is the responsibility of the state to ensure that they operate in a manner that the wild native salmonid stocks (as well as the environment) is not damaged in any way and that the operation is environmentally sustainable. This farm has had an unacceptable level of lice on several occasions and we are calling on the Department to demonstrate that, as the licensing authority, it also has the ability to protect the environment through sanctions.

Please advise this Board by return what measures have been put in place to guarantee that the lice level on the farm is reduced immediately and maintained below the protocol thresholds consistently for the next year at least. Keeping the lice below the thresholds for only one or two inspections is not acceptable.

x

I must also refer to the second and third questions posed in my letter of the 9<sup>th</sup> of May which remain unanswered these are:

Why does it continue to happen year in year out?

Who is taking responsibility?

Massive damage has again been done to sea trout this year. In a year when we should have had thousands of sea trout into the Erriff river only 327 sea trout have entered the fishery and only one of these was over 30 cms. This means that virtually no spawning stock of sea trout has returned this year – the Erriff is an extremely important SAC for salmon and it is incumbent on the state to protect these stocks.

What ever it takes to protect the threatened sea trout stocks must be done, changes in procedures thresholds and protocols must be made.

I want to know what decisive action has been taken on this matter. This Board is meeting later this month to review the sea trout situation and it is vital that a programme of measures proposed by the Department to protect wild salmonids can be put before the Board in advance of the meeting.

Yours sincerely,

---

Gregory Forde Ph.D.  
Acting Chief Executive Officer

cc. John O'Connor, C.E.O. Central Fisheries Board  
Frank Sheridan, Inland Fisheries Division, DCMNR.  
Lal Faherty, Chairman, WRFB.

Feb

**KILLARY HARBOUR**

**CELTIC ATLANTIC SALMON (KILLARY) LTD**

**Rosroe**

Atlantic salmon, 2005      17/02/2006      0.12      0.82

**Mar**

**CELTIC ATLANTIC SALMON (KILLARY) LTD**

**Rosroe**

Atlantic salmon, 2005      07/03/2006      0.19      14.95

31/03/2006      0.13      42.47

**Inishdeighil**

Atlantic salmon, 2006      07/03/2006      0.02      0.02

31/03/2006      0.00      2.00

**April**

**CELTIC ATLANTIC SALMON (KILLARY) LTD**

**Rosroe**

Atlantic salmon, 2005      12/04/2006      5.70      40.33

27/04/2006      3.85      7.42

**Inishdeighil**

Atlantic salmon, 2006      12/04/2006      0.00      0.15

27/04/2006      0.00      0.43

**May**

**CELTIC ATLANTIC SALMON (KILLARY) LTD**

**Rosroe**

Atlantic salmon, 2005      12/05/2006      0.06      0.33

30/05/2006      0.29      53.55

**Inishdeighil**

Atlantic salmon, 2006      12/05/2006      0.00      0.98

30/05/2006      0.02      16.21

**June**

**CELTIC ATLANTIC SALMON (KILLARY) LTD**

**Rosroe**

Atlantic salmon, 2005      23/06/2006      0.12      1.44

**Inishdeighil**

Atlantic salmon, 2006      23/06/2006      0.00      0.26

**July**

**CELTIC ATLANTIC SALMON (KILLARY) LTD**

**Rosroe**

Atlantic salmon, 2005      24/07/06      2.89      23.15

**Inishdeighil**

Atlantic salmon, 2006      24/07/06      0.37      2.00

An Roinn Cumarsáide,  
Mara agus Acmhainní Nádurtha  
Baile Átha Cliath 2.



Department of Communications,  
Marine and Natural Resources  
Dublin 2.

12 July 2006

Dr Gregory Forde  
Western Regional Fisheries Board  
Weir Lodge  
Earl's Lodge  
Galway

Dear Dr Forde

I refer to your further letter of 9 May 2006 concerning lice levels at Celtic Atlantic Salmon (Killary) Ltd. Following monitoring results showing increased levels of sea lice, the Marine Institute issued the farm operator with Notices to Treat (NTT). The Institute then monitored the effects of the treatments undertaken.

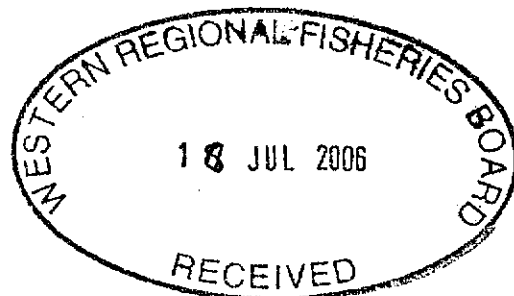
The treatments included SLICE treatment during the period 23 - 29 March and ALPHAMAX treatment in a well boat between 24 and 28 March 2006. The farm continued these treatments in rotation to maximise their efficacy with the result that the infestation was brought under control. Lice levels in April reflect the reductions achieved and these levels were further reduced in May and June.

It should be borne in mind that sea lice are an endemic, naturally occurring parasite and farms are not in a position to control the rate of infection coming from the marine environment, which can be from a variety of sources including other farms and wild salmon. The farm can, and must react to any infection by applying suitable control measures, including the use of authorised veterinary medicines.

Yours sincerely

*Declan O'Rourke*  
DECLAN O'ROURKE

Assistant Principal  
Coastal Zone Management Division



Mr. Joe Ryan,  
Principal Officer,  
Coastal Zone Administration Division,  
Department of the Marine and Natural Resources,  
Leeson Lane,  
Dublin 2.

9/5/06

**Re: Continuing Lice Problems in Connemara.**

Dear Mr. Ryan,

I refer to the recent lice reports for Celtic Atlantic Salmon (Killary) Ltd and wish to advise the Department of this Boards total abhorrence at the level of lice that was allowed to develop at this fish farm in recent months.

For years – all of which have been painstakingly documented, this Board has been flagging the serious problems that result from high lice levels on marine salmon farms in the spring period. Yet again the situation has been allowed to get totally out of control. This is despite the total lice figure as far back as the 7<sup>th</sup> March being on average 14.95 per fish. This then rose dramatically to an average of 42.47 (total) per fish clearly indicating that a major problem was imminent. However two weeks later the matter had not been addressed and a massive 5.7 ovigerous lice per fish was recorded and the total lice figure remained unchanged at 40.33 – some of the highest levels recorded in the region in recent years. This is totally unacceptable.

What has the Department done about it?

Why does it continue to happen year in year out?

Who is taking responsibility?

The damage is done. Yesterday, as was totally predictable, prematurely returning sea trout were noted in the estuary of the Delphi fish. How come I was not surprised?

x

I cannot underestimate the depth of feeling at my Board on this matter. I have also been advised that a major complaint has now been lodged with DG XI in the issue. If prompt and decisive action was being taken I believe these catastrophes could have been averted, but sadly the lice record speaks for itself. When is the Department going to revoke a licence for such appalling lack of control of lice or will we all be awaiting for Europe to tell us how to manage our affairs?

I want to know what decisive action has been taken on this matter and would appreciate a prompt reply.

Yours sincerely,

---

Gregory Forde Ph.D.  
Acting Chief Executive Officer

cc. John O'Connor, C.E.O. Central Fisheries Board  
Frank Sheridan, Inland Fisheries Division, DCMNR.  
Lal Faherty, Chairman, WRFB.

Mr Sheridan  
11/3/07

Mr. Brennan  
Account of Friday's meeting  
me to write to 9/09. re: lice

47/7/3/8

Sea trout Stock Collapse in Connemara 1988 - 2007 - 20 Years of Destruction

3/12

Rayell  
Andrew  
John  
Hugh  
9/6  
12  
15

- 1 scientific investigations have revealed that sea lice from marine salmon Following the exponential expansion of the salmon farming industry in Connemara in the late 1980 the sea trout stocks in virtually all Connemara rivers collapsed in 1988 - 1989.
- 2 Exhaustive scientific investigations have proved that Salmon Farms are primarily responsible for the loss of this unique species.
- 3 The Marine Institute now accepts that lice from marine salmon farms are the primary cause of sea trout mortality in the area
- 4 The EU funded SUMBAWS ( sustainable management of interactions between aquaculture and wild salmonids) project clearly demonstrated that even as few as 10 lice on a wild salmonids will lead to mortality.
- 5 The most recent study has shown that sea lice from marine salmon farms are also a major mortality factor in wild salmon from Connemara. This has been particularly evident in Killary harbour where the anticipated increase in salmon following the buy out of the drift nets did not occur and marine survival of wild salmon from the two rivers in the area was particularly poor in 2006 / 2007.
- 6 There are several complaints in Europe against Ireland for its failure to protect the wild sea trout and more recently its failure to protect wild salmon due to the proliferation of lice from marine salmon farms.
- 7 Salmon farms have traditionally been sited in Ireland in Connemara, an area rich in wild salmonid fisheries. The locations for salmon farms should be moved to areas remote from wild salmonid fisheries. No salmon farms should be permitted within 25 kms of the mouth or estuary of a wild salmonid fishery.
- 8 Marine salmon farms must be moved offshore and must become self contained. This is now being proposed for

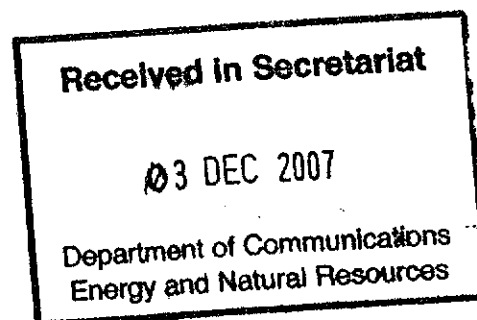
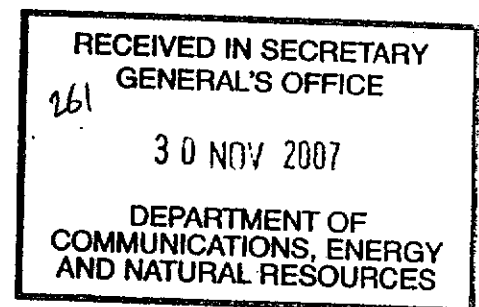
7/3/7

Record No  
12

**Vancouver Canada.**

- 9 Recent proposals to develop offshore aquaculture in Ireland has resulted in proposals for aquaculture closer to the shore and wild fisheries than some of the existing salmon farms which remain unacceptable – offshore must mean offshore.**
- 10 No sanction has ever taken place against a salmon farm for poor lice control or failure to eliminate lice from the farm.**
- 11 ACTION IS REQUIRED NOW. Both Departments must devise a joint initiative which must have the protection of wild salmonids (both salmon and sea trout) as its primary objective.**
- 12 A programme of funding will also be required to assist with the restoration of wild stocks and habitat.**

Lal Faherty  
Chairman  
The Western Regional Fisheries Board  
30<sup>th</sup> November 2007

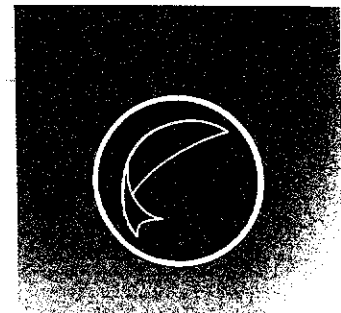


Record No 15



# Western Regional Fisheries Board

Bord Iascaigh Réigiúnach an Iarthair



Fisheries Ireland

Our Natural Heritage

Mr. Brendan Tuohy,  
Secretary General,  
Department of Communications, Marine and Natural Resources,  
Leeson Lane,  
Dublin 2.

*EO C. Beamis*  
For Observations  
For Action  
For Follow up  
For Information

1<sup>st</sup> August 2006.

Re: Grant Aid for Aquaculture Sector.

*Added by DAKC*  
*J. Kelly & David Ryan*  
*Roman Aine O'Neil*

Dear Secretary General,

First of all I welcome the initiative that you have taken in looking afresh at the sea lice situation and the need to review the control measures to ensure that aquaculture no longer has a major negative impact on wild salmonids both salmon and sea trout. Furthermore I have just been advised by my colleague that you are also reconvening the Sea Trout Review Group with a view to making progress on the matter. I can reassure you of my total commitment to this process and was fully prepared to work with the other agencies to that end back in January.

However, last week I received a press release from the Minister of State at the Department of the Marine and Natural Resources announcing grant aid for the Aquaculture Industry of some €13.3 million. While grant aid to encourage investment can be welcome particularly if tied to strict environmental standards or if to improve environmental protection, I find it extremely hard to understand that (for example) one farm that has had nothing short of an appalling lice record this year (Celtic Atlantic Salmon (Ireland) Ltd) is to receive grant aid of €299,451. To us this would seem to be a reward for poor environmental management practice on the farm.

This year prematurely returning sea trout with major lice infestations occurred again in the river mouths of both the Delphi and Erriff rivers the two river systems adjacent to the above salmon farm. This is another year of sea trout recruitment and angling lost. We now have full trapping facilities on the Erriff river and we can confirm that in June and July 2006, when the peak of the sea trout run would normally enter the river, (and this should be in the thousands of fish), only 327 sea trout entered the fishery and of these only 1 was in excess of 30 cms long. This is also against a background that the Erriff is a state fishery purchased by Minister Paddy O'Toole Minister for Forestry and Fisheries in 1983.

RECEIVED IN SECRETARY  
GENERAL

04 AUG 2006

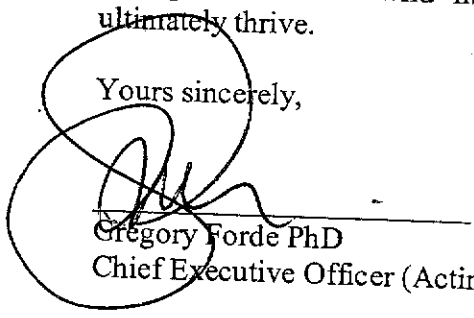
The Western Regional  
Fisheries Board

In the current NDP the Board had hoped to continue with developing and investing in the wild fisheries of the region yet the €30 million included for wild fisheries never materialised. In the early years funding was withheld due to the retraction in the economy, however, when the boom took off again virtually none of this funding materialised despite the fact that the economy was flourishing and the exchequer was flush with funds – it was meant to be wholly exchequer funded. What has now developed is a completely inequitable situation whereby the aquaculture sector can avail of major state and EU funding for the development of its industry and the wild fishery and tourism sector is not in a position to secure funding despite it being part of the NDP. I have grave reservations about this scenario and believe as a nation we are extremely exposed to being accused of bias or discrimination in favour of aquaculture at the expense of the wild salmonid fishery.

In the short term any grant aid to aquaculture companies, in this Boards opinion, must be conditional on continuous adherence to strict environmental standards and that any breach of lice targets (i.e. protocol levels) would result in withdrawal, recovery or non payment of grant aid – this should be part of the conditions of grant aid and signed off on by both parties and an independent review of conformance put in place. Consideration for grant aid should also take into account the recent environmental history of the farm.

Finally, as I stated at our meeting in Dublin, I am willing to participate in the review process in an effort to find acceptable common ground whereby environmental standards are upheld and the wild fish are afforded the greatest opportunity to survive and ultimately thrive.

Yours sincerely,



Gregory Forde PhD  
Chief Executive Officer (Acting)

Record No 15

LICE

Oifig an Árd Runaí  
An Roinn Cumarsáide  
Mara agus Acmhainní Nádurtha  
Baile Átha Cliath 2



Office of the Secretary General  
Department of Communications  
Marine and Natural Resources  
Dublin 2

Email: [Brendan.Tuohy@dcmnr.ie](mailto:Brendan.Tuohy@dcmnr.ie)  
Website: [www.dcmnr.ie](http://www.dcmnr.ie)

Tel: +353-1-678 2030  
Fax: +353-1-678 2079

4 August 2006

Dr. Gregory Forde  
Chief Executive Officer (Acting)  
The Western Regional Fisheries Board  
The Weir Lodge  
Earls Island  
Galway

C Brennan  
for any obs please  
& maybe we can  
consider at meeting  
with M Brennan et  
al.

**Re: Grant Aid for Aquaculture Sector**

B Tuohy  
30/8/06  
cc M Brennan

Dear Dr. Forde,

On behalf of Secretary General, Brendan Tuohy, I wish to acknowledge receipt of your letter of 1<sup>st</sup> August 2006 in relation to the above. The Secretary General is on annual leave for the month of August and I will bring your letter to his attention on his return to the office. In the meantime, I have forwarded it to the relevant people in the Department.

Yours sincerely,

Dorothy McCauley  
Dorothy McCauley  
Secretary General's Office

**BIM response to the CZMD 'Draft 'Interim Report to the Minister' of the Sea Lice Monitoring and Control Working Group and comments arising from the meeting of the 24<sup>th</sup> of May, held to consider the report and other matters.**

**Introduction**

The BIM members of the working group only received copies of the full text of the report at the conclusion of the meeting of the 24<sup>th</sup>. The meeting itself largely dealt with a set of recommendations that were circulated at the start of proceedings together with some brief discussion on the executive summary of the report. Thus this response will deal separately with these three elements of the document.

**The executive summary**

The contents of the executive summary (ES) are somewhat at odds with the text of main body of the report. Points raised in the ES do not seem to be drawn from the main report but appear to have been 'parachuted' in without adequate reference. For example, particular issues regarding mandatory state reporting under the *Habitats Directive* and possible fines for Ireland with regard to the status of wild salmon stocks are raised, which are not covered at all in the main text of the report. This issue was also the subject of discussion at the meeting. Suggestions were made by Dr Gargan of the Central Fisheries Boards that there was evidence of negative interactions between sea lice infestations on salmon farms and wild salmon populations in Ireland. Contrary to what was said, there is no published peer reviewed data to back this contention and it is entirely inappropriate for it to appear in any part of the report. Having checked the *status quo* with the Marine Institute, the current position remains that there is no substantive evidence at present regarding a link between sea lice on salmon farms in Ireland and the status of the Irish wild salmon stocks.

The same issue of dislocation from the main text also holds true for the fourth paragraph of the ES where a proposal is made to extend the so-called 'critical period' by extending it to cover the month of February each year. This issue is not discussed in the main text and the pretext for bringing it forward, of 'increased water temperatures', is bizarre and irrelevant. It should be noted that Dr Gargan conceded at the meeting that the only rationale for extending the period would be to try to ensure that levels were better controlled during the 'real' critical period of March to May. The clear implication of that point of view is that the critical period is correct as it stands and that the issue is not about extending it, but is really about improving lice control during it. These are separate matters and should not be confused.

There are a number of other inconsistencies between the ES and the main text, which need to be addressed before the report is more widely circulated.

Thus it is clear that the executive summary is not a fair summation or reflection of the main text and it should either be edited to reflect the actual content of the report or the main report has to be substantially reworked to deal fully with these major extra topics which have been inappropriately 'injected' into the ES. As it stands the ES is misleading and seriously flawed.

### **Recommendation No 3.**

It is felt that recommendation 3 should be combined with recommendation 2 as they appear to be similar and to be repeating each other.

### **Recommendation No 4.**

This recommendation is certainly worthy and the consultative mechanism being put forward could usefully be incorporated into an upgraded version of the existing Single Bay Management (SBM) system and given a country-wide dimension via the Coordinated Local Aquaculture Management System or CLAMS process.

### **Recommendation No 5.**

This recommendation as currently drafted is incoherent and it is not clear what is actually being recommended. 'Poor farm management in carrying a (sic) lice control measures' was not raised as an issue during the group's discussions and is not mentioned in the main text. Given the expense of purchasing the medications for pest control it would not be in a salmon farmer's interest to apply them in a sub-optimal manner and risk having to purchase more. The issues around farm management to control sea lice are spatial and temporal and involve the need to fallow sites and separate stock generations, which need to be addressed through licencing as dealt with under recommendation No 7.

The second sentence is also incoherent and does not seem to recommend anything as such. The effect of PD on sea lice control was very briefly discussed at the meeting, but it is not clear what is recommended in this regard. The key effect of PD with regard to sea lice control on farms is that its presence severely reduces the efficacy of the 'in-feed' treatments because of the inappetance symptom it causes amongst much of the stock. If the recommendation is to the effect that the current programmes being pursued by the state agencies in cooperation with the industry to mitigate the incidence and effect of PD should be continued, then BIM would support it.

This recommendation needs to be redrafted.

### **Recommendation No 6.**

This recommendation is unclear and ends with the word 'sanctions' in brackets. We take it to refer to the issue of possible sanctions being applied to salmon farmers in the event of their being unable to keep the sea lice infestations on their farms below the so called 'trigger' levels. In our view this line of recommendation is fruitless and counter to the spirit of the working group. It was agreed at the start of the process that the sea louse was to be the focus of our efforts and it has been accepted that the salmon farmers have not been delinquent in their efforts to control this pest on their farms. It is our contention that the report should contain recommended actions that strengthen the willing hand of the salmon farmer to combat this pest. Inserting gratuitous recommendations that seek to raise the compliance bar still higher or create sticks to beat the farmers, despite their best efforts, are counterproductive and will not improve the situation one iota.