

Laune Salmon and Trout Anglers' Association

Objection to the granting to Board Iascaigh Mhara (BIM) of a foreshore licence and an aquaculture licence for the development of a Salmon Farm in Galway Bay.

Re: T9/489 A & B

To:

Minister Simon Coveney  
Department of Agriculture, Food and the Marine (Aquaculture and  
Foreshore Management Division),  
National Seafood Centre,  
Clonakilty,  
Co. Cork.

**The Committee and Membership of Laune Salmon and Trout Anglers' Association wish to make known to you their objection to the granting of an Aquaculture Licence and a Foreshore Licence to Board Iascaigh Mhara in pursuance of their wish to develop a salmon farm in Galway Bay, Co. Galway.**

In 2013 the Laune Salmon & Trout Anglers Association will be celebrating the 50<sup>th</sup> birthday of its re-establishment as an Association but there is documentary evidence available to certify that the Laune Anglers' Association existed as an active fishing club on the river Laune in the year 1912.

We in Laune Anglers know from long and difficult experience with various state bodies the struggle it has been to keep salmon and trout returning to the Laune. We fought over many years to get previous Ministers for the Marine to see the light about Mixed Stock Commercial Drift netting. Eventually it took anglers on the streets and EU Driven legislation to stop this unsustainable harvest. Unfortunately the membership of Laune Anglers sees the existing Salmon farms and especially the proposed BIM development in Galway Bay as a more serious menace than Drift Netting was.

### **Reasons for our Objection**

#### **1. On the Grounds of Sustainability:**

**What happened in Chile:** In the National Geographic Magazine February 2010 in an article called The Power of Patagonia By Verlyn Klinkenborg

In the article the author states and we quote

*...Distance is no protection these days. After Norway, Chile is the world's largest producer of farmed salmon, which are grown in podlike cages anchored offshore in Las Guaitecas National Reserve. ...The Norwegian companies that began salmon farming in Chile came here because the fjords were unspoiled. That is no longer*

*the case. Like nearly every form of concentrated animal agriculture, salmon aquaculture creates an excess of waste. Here salmon farms deaden the water, creating anoxic conditions, and have led to the spread of a lethal salmon virus called infectious salmon anemia. The solution of the salmon-farming companies has simply been to move south into clean waters. Already the companies have taken out new leases on stretches of water throughout the southern fjords.*

Infectious Salmon Anemia (ISA) first reported in Norway in 1984 has occurred in Ireland recently and Scotland has had outbreaks. The development of Salmon farms can only increase the chances of this potentially deadly disease in salmon infecting our wild salmon on a regular basis.

*...The overwhelming majority of cases occur in farmed fish in sea water. The virus has been detected in wild fish but cases of clinical disease have only been reported in farmed fish. The disease has also been detected in the UK, Canada and Chile. ...There are no treatments for ISA.*

<http://www.thefishsite.com/diseaseinfo/5/infectious-salmon-anaemia-isa>

Chile with the longest coastline in the world, have some options when things go wrong. There is nowhere to go in Ireland when inevitably they will go wrong. There is one other vital difference between Chile and Ireland. In Ireland we have two native species of fish, Atlantic Salmon and Sea Trout which happen to migrate from the rivers of their birth through the seas off the west coast and the North Atlantic and must return again to spawn in their natal rivers. They can't be impeded in this journey by man-made barriers of any description.

In Page 3 Food Harvest 2020 – 2020 Vision and Targets the following inexplicable (When it comes to farmed Salmon) statement is made.

*...In particular, the opportunity for the Irish agri-food industry to grow and prosper sustainably through the delivery of high quality, safe and naturally based produce. ...consumers who demand the highest quality in production and environmental standards, expect clear visibility on sustainability issues*

What is natural, high quality and above all sustainable about Farmed Salmon?

## **2. Danger to Laune Salmon Smolts from Sea Lice and Sea Lice Larvae:**

A quote from; *Impact of parasites on salmon recruitment in the Northeast Atlantic Ocean* by Patrick G Gargan et al.

### **...39% of salmon mortalities were attributable to sea lice:**

Salmon anglers in Kerry have always known that there has been a clear link between smolt survival at sea and the development of 'Salmon Farming'. No angler or marine biologist worth his salt will try to argue other than salmon farming has had a devastating impact on salmon and sea trout. The excellent salmon and sea trout fisheries of county Galway made famous in that classic of angling literature '*A Man may Fish*' by Mr Justice Kingsmill

**Moore.** These renowned fisheries are now a remnant of what they were in Kingsmill Moore's time. This is despite years of rehabilitation works and at a cost of millions. No independent authority will say other than their demise is down to salmon farming. The smolts could not withstand the assault from the concentrations of sea lice produced by the proximity of salmon farms to the migration routes of our sea trout and salmon smolts. Ireland being a small country means that no matter where you locate salmon farms or on what scale the development, it can't be built or managed without our migrating salmon and sea trout smolts having to run the gauntlet of millions of sea lice and clouds of its larvae. The IFI comments on the BIM Environmental Impact Statement focuses on the migrating smolts from the Corrib system and it finds the EIS woefully wanting in this department. Members of Laune Salmon Anglers want to know how do the smolts from the Laune avoid the Galway Bay salmon farms. Is it Right or Left at the Arran Islands?? Even if salmon farmers quibble with the 39% above (which we are sure they will)

**Salmon Farmers agree that 1 to 2% of smolts may fall prey to sea lice from their salmon farms.**

There are eight **Catch and Release** rivers in Kerry for **2013**. (Blackwater, (Kerry) Sheen, Kealincha, Lough Fada, Ferta, Owenascaul, Milltown, Feohanagh.)

There are nine **Closed** rivers in Kerry for **2013** – (Behy, Emlagh, Owenshagh, Cloonee, Finnihy, Owenreagh, Emlaghmore, Carhan, Lee (Tralee))

These rivers are Catch and Release or Closed to fishing because on an annual basis they can't reach their conservation limit. Mr Coveney, you may be the minister who presides over the extinction of salmon in these rivers if you allow this development to go ahead because of this 1% to 2% of smolts falling prey to sea lice, this could be the tipping point.

In page 6 of The Impact of parasites on salmon recruitment in the Northeast Atlantic Ocean, As Paddy Gargan et al, puts it.

*...Small river systems that support salmon populations of low effective population size ... will be especially vulnerable. The concern therefore is not only for a 39 per cent loss in salmon abundance, but also the loss of genetic variability and its associated potential for adaptation to other environmental changes.*

The findings in this research paper are described as unequivocal, parasites such as sea lice are responsible for an average of 39% of all salmon deaths at sea. Kerry Rivers don't need any other challenges that might tip the balance into total annihilation. Inland Fisheries Ireland comments on this proposed development. Pages 5/6.

*...A recent study was conducted to determine the potential impact of sea lice from salmon farms on out migrating salmon smolts in three bays in Connemara (Gargan et al. 2012). The study found that analysis of tag recaptures from returning adult salmon showed that emamectin-treated smolts experienced increased survivorship and were 1.8 times more likely to return compared to control fish. These results suggest that sea lice-induced mortality on adult Atlantic salmon returns in Ireland can be significant, and that sea lice larvae emanating from farmed salmon may influence individual survivorship and population conservation status of wild salmon in these river systems”.*

The IFI Comments draw serious attention to the bad effects of Sea Lice from farmed salmon on wild populations. It informs us that in the North Atlantic, stocks of Wild Salmon have shown a marked and steady decline of approximately 45 per cent since the 1980s, with variability among stocks and **correlations to salmon aquaculture have been drawn.** We rest our case.

### **3. Escape of Hatchery bred salmon puts wild salmon at risk:**

The problems associated with salmon that escape from sea cages is a well-known phenomenon. Most anglers have experienced catching an escaped farmed salmon, but as only 15% of salmon that make it into the river are caught by anglers, it means that 6 to 7 farmed fish may have escaped to mingle with the wild fish and disrupt or displace them on the spawning beds for every farmed salmon caught by anglers.

The BIM - EIS states that there has been little or no genetic interaction between farmed and wild salmon stocks. Whereas the IFI Comments on the EIS states that there is in fact

*...a large body of published literature on the negative interaction of farmed and wild stocks.*

Resulting in.

*...reduced wild smolt production.*

The problem of escapees and its impact on wild salmon and sea trout is not unlike that outlined above in respect to Sea Lice. The Laune Anglers' concern is the dilution of the wild salmon's unique genetic characteristics developed over 10,000 years of evolution. This genetic fitness if you will has sustained salmon runs into all our Kerry rivers since the last ice age and is irreplaceable. Escapees from Farming Nets present a hazard to all our rivers in Kerry even those comfortably meeting their conservation limit. If this begins to be eroded then we will have more than 17 rivers without a quota.

There are only ten rivers in Kerry that are designated as having a harvestable surplus. This harvestable surplus just barely makes commercial and recreational angling viable at the moment. Mr Coveney you may be the Minister who **presides over** the rest of our 'Open' Rivers in Kerry becoming Catch and Release or Closed. What anglers want and what a viable tourist angling product needs is an abundance of fish not marginally sustainable angling. In Page 6 Submission by Inland Fisheries Ireland on the Environmental Impact Statement for a Deep Sea Fish Farm Development in Galway Bay put it as follows.

*They concluded that interaction of farm with wild salmon results in lowered fitness, with repeated escapes causing cumulative fitness depression and potentially an extinction vortex in vulnerable populations.*

All rivers in Kerry would be vulnerable in the context of such a massive development.

### **4. How Organic is farmed Salmon?**

The assertion that you can produce Organic Farmed Salmon is surely a joke that has been seen through by even the most gullible of consumers. How can you call a product organic,

when it depends on chemicals, artificially produced feed which depletes the natural food of salmon and all other fish life and causes serious environmental damage far from the vicinity of the cages. How long can the myth that you can produce 15,000 tonnes of salmon annually at one site without causing some other kind of environmental collapse, go on for? For every ton of salmon produced you need to feed the salmon 3 tons of other fish, caught wild from all over the world. Possibly catching the food that wild salmon at sea depend on. For how long can we sustain catching 75,000 tonnes of fish annually and feeding it to caged salmon go on?

Xanthe Clay wrote about her visit to Scottish Sea Farms (Lochmuir) on the 11<sup>th</sup> December 2011 and wrote about her visit in the Telegraph. Xanthe's honest article vividly illustrates just how unsustainable this industry is. At the same time it runs down the Norwegian practice of producing too oily fish. (Fat)

*A spray of pellets shot from a feeder spinning at the edge of the pen. In the wild, salmon are carnivores, eating plankton, prawns and other fish. Quality of feed is important on farms because it affects the levels of valuable omega-3 oils in the fish, but also because oily fish can accumulate toxins in their flesh from what they eat. For this reason it is vital that the feed is as pure as possible, explains John Barrington, the quality manager: "Run-off from the land from the high levels of industrialisation in the northern hemisphere means the wild fish used for the feed are intrinsically polluted. Lochmuir uses cleaner, southern hemisphere fish from Peru." So we import fish from South America to feed to fish in Scotland? Indeed: the environmental sacrifice is considered worthwhile to have a safe product.*

*The bulk of the salmon we eat in the UK is Norwegian but, according to Barrington, "Norwegian salmon is grown very quickly, with diets approaching 40 per cent fat compared to our 33 per cent." It is, however, cost effective, with Norwegian salmon ready in less than two years from hatching, compared with two-and-a-quarter to three-and-a-quarter years for Scottish Sea Farms. "The Norwegians are proud of their methods," Barrington says. "Cheapest into Europe' is one company's strapline. But what you sacrifice is the texture. You'll get a fatty fish, with a lot of free oil running off when you cook it."*

Our Highlights.

We would be very concerned about the 'quality managers' comments about wild fish feed being polluted. Has he any concerns about eating his own farmed salmon???

##### **5. Salmon Angling Sustainable with a Social Good.**

Mr Coveney you may be the minister who destroys the sport, passion and love of thousands of anglers throughout the country. These 500 jobs promised (which a lot of commentators consider a bit unlikely) even if they come true at what cost? Laune Anglers members consider that this development would be a disaster. What we have at the moment is small scale and vulnerable but at least it is sustainable. As well as this it has a social good. This is not just true for the Laune in Kerry but applies to all other Angling Associations in the country.

When you consider Laune Anglers 190 members drawn from Kerry (mainly) , Ireland, UK, France, Denmark and Germany. During the course of a season it has been estimated that the value of an angling Association such as ours makes a contribution of almost **€300,000** annually to the local economy. Licences, subscriptions, tackle, clothing, bait, food, accommodation. The International members who come for their fishing break pay hotels, guest houses, B&B's, restaurants for accommodation, meals, car hire, flights etc. The latter is also true for the Kerry, Irish and International anglers who through the purchase of weekly or daily permits generate spin off spending which is important for the local economy. All the funds generated are ploughed into the local community.

We don't want what we have jeopardised in any way by short-sighted developments of Fish Farms on the scale envisaged in the Board Iascaigh Mhara, Environmental Impact Statement.

#### **6. Laune Anglers are not Alone:**

We know we are not the only angling Association who have grave concerns about this proposed development. We ask that you consider this objection carefully (along with the rest of them) and make a decision that does not smack of the kind of politics we have had more than our share of in Ireland for the last twenty years. The international players involved as promoters of this kind of project are persona non grata in several parts of the world. They have left a trail of destruction in their wake, there has to be a better way. Our suggestion is to make our salmon and sea trout angling product the best available in the world. We are in the lucky position to be able to do this still but we could be on the slippery slope to a place where there would be no way back.

It will be your decision Mr Coveney. If you decide to allow this development then you will be making a decision that is the exact opposite of what our 190 members want. Laune Anglers believe that this is an issue for Salmon Anglers across the country which will see them back marching on the streets to make their opposition clearly know as they had to do to get rid of Mixed Stock Drift Netting.

#### **7. Special Area Of Conservation (SAC):**

Castlemaine Harbour is a candidate SAC. The rivers Caragh, Maine and Laune are the most significant rivers flowing into Castlemaine Harbour. These rivers are home to the Atlantic Salmon and River Lamprey and Freshwater Mussel. These are species which are listed in Annex I of the E.U. Habitats Directive. As well as this the Laune is recognised as a river of special significance in the National Parks & Wildlife Service publication (March 2011) Castlemaine Harbour Special Protected Area.

***Castlemaine Harbour is of major ecological importance. It contains a range of coastal habitats of excellent quality, including many that are listed on Annex I of the EU Habitats Directive. It also includes long stretches of river and stream which are excellent habitats for Salmon, Lamprey and Otter***

This status of candidate SAC or SPA confers special status on the Laune and the Atlantic Salmon therein. No risk to this status can be taken when it is admitted that escapees are a fact of life of salmon farming. There can be no risk taken with these species even for 500 jobs.

## **8. Future Sites for Salmon Farm Development:**

As already stated, Laune Anglers' members are already extremely concerned about the impact that salmon farming has had and is having on our stocks of Sea Trout and Salmon. They are alarmed at the thought of the proposed development in Galway Bay. But when they see that future developments of this nature may be located at the entrance to Dingle Bay they are at the one time aghast and exasperated. Laune Anglers hope to celebrate 50 years of existence in 2013. When we look back over the history of the Association in those 50 years it has been one struggle after another. Usually fighting the government, fishery boards or other government agencies on behalf of Association anglers and for an abundance of salmon and trout in our rivers. Not, let us add to kill all round but more often than not, to catch and return the fish to the river and come back to the same pool in four to five years' time and catch the offspring of that released salmon or trout.

This life cycle of the salmon and trout is well understood by anglers to be a fragile balance between the salmon's innate ability to cope with huge natural challenges to be born, grow to smolt stage, migrate, feed, grow to adult stage, return to the estuary, run the river avoid capture by all the predators out there including man with nets and fishing rods. To be fair to anglers the interaction between anglers and salmon and sea trout is always on the salmon and trout's terms. The angler has to tempt the fish to take the fly or bait presented.

Mr Coveney the salmon's life is difficult enough they don't need the further challenge of this massive development and its concomitant ills as outlined above.

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