

**From:** Geoffrey H T Fitzjohn [REDACTED]  
**Sent:** 05 October 2018 18:51  
**To:** Marine Spatial Planning <msp@housing.gov.ie>  
**Subject:** Marine Spatial Planning Submission

Dear Sirs

### **Marine Spatial Planning Submission**

I attended your launch of the National Marine Planning Framework Baseline Report in Galway today, which I found to be informative.

By way of introduction, I am a lifelong angler, residing in Connemara and a minority shareholder in the Costello & Fermoy salmon and sea trout fishery.

I fish for salmon and sea trout principally on the Costello (Casla) and Dawros rivers in Connemara.

I also have long experience in land and fishery management both in Ireland and in Scotland.

I have particular concerns with regard to Section 5 of your report in relation to aquaculture and salmon aquaculture in particular.

Part 3 Issues for Other Sectors on page 25 is grossly misleading and incompetent. It fails to mention let alone address the issue of sea lice and the genetic contamination of wild salmonid populations by fish farm escapees.

We know that salmon farms act as reservoirs for sea lice, which then infest both migrating juvenile salmon and sea trout and also impact negatively on sea trout feeding inshore.

Sea lice protocols ignore the number of fish contained on particular sites and are based on the number of lice per fish.

Farmed salmon, which bear little resemblance to their wild counterparts, in open cage should be regarded as an invasive and indeed a non native species.

The solution is to take salmon aquaculture onshore, where it can be properly regulated as with other forms of food production.

Much is made of Origin Green and traceability in relation to agricultural produce. However last year, farmed salmon escapees were turning up in Connemara rivers and nobody wished to determine from whence they came.

So much for traceability and much trumpeted organic salmon aquaculture.

What goes on or is allowed to take place in one bay or area can have a serious detrimental impact on other activities and indeed communities elsewhere as migratory salmonids migrate, sea lice are dispersed by ocean currents and escapees can swim!

Thus a salmon farm in a particular bay, which might be perceived to be economically sustainable for the people of that particular locality can and will impact negatively on other coastal communities, who may be dependant on angling tourism.

Open cage salmon aquaculture has displaced and indeed eradicated angling tourism jobs both in Ireland and Scotland.

It was interesting to note that your panel of speakers included a senior representative of Mayo County Council and a spokesperson for a major multinational involved in salmon aquaculture. We know that the next major open cage salmon aquaculture application is going to be off Inishturk. No doubt to be presented as the saviour of the island population but what about the environment and angling sector jobs in the wider domain.

The suggestion that there are open cage salmon aquaculture facilities in Clew Bay etc and a 'successful' salmon fishery at Delphi was held up a 'proof' of co-existence. However inconvenient truths were either not known or omitted, such as Delphi has to run a salmon hatchery producing tens of thousands of smolts each year at vast cost in order to try and mitigate the impact of sea lice mortality.

Delphi was a premier sea trout fishery and has had to 'ranch' salmon to make up for the decimation of its sea trout population by sea lice emanating from open cage salmon farms.

### **Section 21 Sport and Recreation**

I read the list of activities listed a number of times but see no reference to angling, be it sea angling or angling for migratory salmonids, which traverse the marine environment. A major omission?

There does not appear to be any body or group included in the list of Public Bodies with Marine Responsibilities championing or with an interest in migratory salmonids and angling for that matter. Inland Fisheries Ireland appear to have been sidelined notwithstanding they have a genuine interest and responsibility for migrating salmonids and indeed carry out protection duties in the marine environment.

It was interesting to note that Scotland had made a 'head start' on Spatial Marine Planning. However they had to as the horse had already bolted and the West Coast of Scotland, which I know well, has been despoiled by largely unregulated open cage salmon aquaculture in particular, with thousands of angling tourism jobs and job opportunities destroyed in the process.

You can have all the consultations you like, but until such time as open cage salmon aquaculture is brought into close containment and regulated, the sea lice contamination issue is dealt with and no risk of escapees infecting the vulnerable wild salmonid populations, there will no resolution of the conflict between open cage salmon aquaculture and those with a genuine concern and regard for migratory salmonids. 30 years plus we have been fighting this battle.

If it is this Governments intention to plaster the Western sea board of Ireland with open cage salmon farms, why are we wasting millions of euros promoting tourist angling and our 'green' credentials? Surely we must learn from the mistakes made in Scotland and Norway.

I would be obliged if you would acknowledge my submission.

Yours sincerely

Geoffrey

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