

Mr. Nicholas Hoffman  
Secretary – BIM Critical Review Group  
c/o Dept. of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty, Co. Cork  
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**RE: Critical Review of Bord Iascaigh Mhara**

Dear Mr Hoffman

The Environmental Pillar welcomes this opportunity to participate in the critical review of Bord Iascaigh Mhara. However, in our opinion, **this consultation should be open to all stakeholders** and a much **more reasonable time frame** given. We are also very concerned that, while the industry sector is represented, there are **no environmental representatives on the review group**. Moreover it is worrying that the terms of reference for this review quote Food Harvest 2020 as Government policy (which to our knowledge is not in fact official Government Policy) but **fail to mention the Common Fisheries Policy**, which has a much stronger focus on sustainable environmental practices.

According to the report of the Special Group on Public Service Numbers and Expenditure Programmes, absorbing BIM into other organizations could result in savings of approx. €7.3m annually. The Bord also noted that many commercial functions of BIM such as seafood marketing, export promotion and seafood business development should be or already have been absorbed by other agencies such as An Bord Bia, Enterprise Ireland and the Seafood Development Centre, Clonakilty. The purpose of this review then, is to recommend whether BIM's [remaining] functions should be subsumed into DAFM. In our opinion BIM's expertise in fisheries and aquaculture, local knowledge and excellent training facilities would be most effectively utilized by **redistributing them amongst a number of organizations such as the Marine Institute, the Sea Fisheries Protection Agency as well as DAFM**. Is such a restructuring open for consideration or has it already been rejected (as implied by the ToR)?

We have neither the necessary information nor expertise to comment on BIM's economic efficiencies. However, we would like to contribute to this critical review our opinion on how well BIM fulfill their mission in relation to environmental protection. According to **BIM's mission statement and customer charter the organization is committed to promoting 'sustainable development' and**

**'responsible environmental practices'**, in line, we presume, with the Marine Strategy Framework Directive which requires the protection of the resource base upon which marine-related economic and social activities depend. Unfortunately this commitment is poorly reflected in BIM's projects and reports as these are chiefly concerned with driving the exploitation of natural resources and promotion of the industry at all cost. The potential benefits of the BIM Stewardship Standard label are significantly limited due to lack of external stakeholder engagement and transparency.

One recent development that particularly worries the Environmental Pillar is **BIM's proposal to become license holder for a number of large-scale finfish operations**. We note BIM's argument that this set-up would ensure better oversight and practice. However, this arrangement may lead to a potential conflict of interest as license holder and regulator are too closely aligned, particularly if the functions of BIM were to be transferred to the Department of Agriculture, Food and the Marine, as considered in this review. To ensure best environmental practice there must be a very clear separation between those that hold a license and those that issue and police it. The main stated advantage of BIM's scheme, namely that 'elements can be built into the commercial contract with the operator that go beyond what is required under the strict terms and conditions of a standard DAFM aquaculture license' (such as extra environmental monitoring and compliance with other standards over and above the normal performance requirements)<sup>1</sup> can also be achieved by including these requirements in specific license conditions.

The Environmental Pillar is surprised at BIM's drive to establish several large-scale salmon farms around the coast. In the last decade the Irish salmon aquaculture sector experienced a strong contraction due to oversupply and poor market price<sup>2</sup>. According to the industry itself, market price is subject to strong fluctuations<sup>3</sup>. It is questionable therefore whether with rising costs for salmon feed and sea louse mitigation measures, salmon farming, and the employment provided by it, is economically viable in the long term.

As to the critical review itself, we feel that environmental representation in the review group is essential to ensure appropriate consideration of the requirements of the MSFD. We also hope that this consultation will be opened up to all stakeholders and the ToR broadened before any decisions are made.

Yours sincerely

Michael Ewing  
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<sup>1</sup> Bord lascaigh Mhara, 2011. Scoping letter for an Aquaculture Licence application for a deep-sea marine fish farming unit off Inis Oirr in Galway Bay

<sup>2</sup> Bord lascaigh Mhara, 2008. Status of Irish Aquaculture, 2007

<sup>3</sup> Marine Harvest, Quarterly Reports for 2011

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Whilst this submission was developed through the processes of the Environmental Pillar it does not necessarily represent the policies of all its members.

*Environmental Pillar members:* An Taisce. Bat Conservation Ireland, BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Crann. ECO UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan Ireland, Gluaiseacht. Grian. Hedge Laying Association of Ireland. Irish Doctors Environment Association. Irish Natural Forestry Foundation. Irish Peatland Conservation Council. Irish Seal Sanctuary. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. The Organic Centre. Sonairte. Sustainable Ireland Cooperative. VOICE. Zero Waste Alliance Ireland