

Final report of the Aquaculture, Introductions and Transfers and Transgenics Focus Area Review Group (CNL (11) 11) – (assessment of EU - Ireland pps 32 - 33)

Criticisms are levied at Ireland for lack of consistency with NASCO's agreements. The Irish Authorities believes that the FAR assessment contains a number of inaccuracies and inconsistencies which it believes need to be addressed and corrected. Ireland finds that the 'text is very generic and makes specific assertions without any facts being adduced to support them.' The Irish Authorities found a certain lack of balance in the review in that 'the assessment is very negative and does not mention the positive actions being undertaken... '.

The Irish Authorities (DAFM) has the following response, on the list of issues identified as not consistent with NASCO agreements and needing additional actions::

1. Insofar as initiatives for international co-operation not being adequately described, the existing initiatives are described in the FAR e.g. Section 2.10 on page 17 refers to Ireland's collaboration in the international EU initiative, an FP7 research project, "Prevent Escape", which is examining the extent and causes of potential and actual failures in containment at marine finfish farming operations in Ireland.
2. The statement that "the progress towards achieving international goals for sea lice and containment are not demonstrated" is inaccurate and should be deleted. Paragraph 1 of the report sets out details of the initiatives to improve sea lice management. The results are published annually in full and with a detailed commentary and clearly demonstrate progress on sea lice control. The report sets out that there have been no escapes in the previous three years
3. The statement that there is "inadequate development of an action plan to minimise escapes" is baseless. The level of escapes is at or about zero and in addition, as noted above, the state is involved in a major EU initiative, an FP7 project "Prevent Escape", which has a stated goal of reducing escapes from fish farms. This project supports measures to minimise the impacts of aquaculture on wild stocks.
4. The statement that "adequate measures to minimise the risk of disease and parasite transmission have not been implemented" is without foundation. It should be noted that Ireland has the highest disease free status in Europe and there are

several references to disease control in the plan e.g. “a comprehensive fish health management regime which protects against transfers of disease” (p. 12); Marine finfish aquaculture licensees are required to have an emergency plan providing for appropriate responses to mortalities, escapes, disease, chemical spills etc. across geographical areas; (p.15) all transfers of hatchery reared fish for release into the wild must be cleared by a qualified veterinarian and be certified as disease free (p.16) etc.

5. Statements in the text of the assessment relating to the presentation of sea lice data from the national monitoring programme (“While there is a national sea lice monitoring programme on the farms and monitoring of lice on sea trout in estuaries these data are not presented in a manner that allows progress towards the international goals to be assessed”) is made without any basis and should be deleted. The data is in fact published in full on an annual basis and each set of annual results is set in the context of the preceding years’ data.