

# SLANEY RIVER TRUST LIMITED

7 Appian Way,  
Dublin 6

6 December, 2012

Dear Sir / Madam,

I have been requested by the Board of Slaney River Trust Ltd. to write to you outlining the main reasons for the Board's view that a license should not be granted for Bord Iascaigh Mhara's proposed Deep Sea Salmon Farm.

First, there is evidence that smolts migrating from the R. Slaney to their ocean feeding grounds travel along the west coast of Ireland. They will be exposed to attack by sea lice from the farm as they travel along the Galway coast. The majority of Slaney salmon are spring salmon which makes the Slaney unusual among Irish salmon rivers which have mainly summer salmon. Spring salmon are highly prized by anglers for their large size and are becoming increasingly scarce. The proposed BIM farm is of such a huge size that we do not find BIM's proposals for control of sea lice to be credible. Recent research has conclusively proved the damage caused by sea lice to wild salmon smolts – see Proceedings of the Royal Society 20122359.

The above comment relates not just to the R. Slaney but to all Irish rivers with stocks of salmon and sea trout whose migration path is off the Galway coast.

Second, this will be one of the largest salmon farms in the world, a dramatic increase on the current average size of salmon farms in Ireland. We doubt that BIM have adequately analyzed the management problems that are likely to arise in running such a huge undertaking. Substantial risks can be foreseen in the following areas. 1) Storm damage to the farm. Scientists generally agree that extreme weather events are more likely in the future as a result of climate change. Major escapes of salmon are likely in such an event and could have a catastrophic impact – through interbreeding – on wild salmon stocks throughout the western seaboard where many of Ireland's finest salmon rivers are located. IFI's submission noted that 415,000 salmon had escaped from salmon farms in the period 1996 to 2004. 2) Disease outbreaks will be impossible to control given the very large numbers of salmon in close proximity to each other – 2.5m. at peak. 3) Importation of smolts to stock the farm from the UK and elsewhere is highly undesirable given the risk from disease and the impossibility of ensuring invasive species are removed from the water used to transport the smolts. Irish smolt farms currently don't have capacity to stock the farm.

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Directors: R. Burgess, J. Carroll, D. Dobbs, K. Dodd, V. Duigan, S. Feeney, D. Hanley, T. Mernagh, D. Page, N. Scott, B. Stephens

Incorporated in Ireland – Registration number 353361.

Third, good practice in salmon farming is increasingly coming to the view that closed containment salmon farms are the way forward for the future of the industry. There are a number of references to this on the website of the Atlantic Salmon Federation [www.asf.ca](http://www.asf.ca). A recent example is an article from the Vancouver Sun dated November 17, 2012 headed Salmon Farming Comes Ashore. It refers to the Namgis First Nation's salmon farm near Vancouver. 'What's different about these fish is that they will never swim in the ocean, never come in contact with wild salmon and never be treated for sea lice. Namgis's closed containment salmon farm is the first commercial-scale land-based fish farm for Atlantic Salmon in North America. It's part of a global trend of large closed-containment farms also being pursued in Denmark and Chile.' The full article, which discusses the advantages of such a system, is attached to this letter. Key points are: no environmental damage, a better product, twice as fast a growth rate compared to sea farms. It is greatly to be regretted that BIM did not consider this approach.

Fourth, an Environmental Impact Statement should be carried out by an independent organization. This EIS was carried out by BIM personnel. As BIM is the applicant for the Project, it cannot be independent and there is a clear conflict of interest. There is another conflict of interest in that BIM's parent Department is also the decision-maker on the application.

As background, Slaney River Trust Ltd. represents anglers, angling clubs and fishery owners on the R. Slaney. It is committed to working in partnership with communities in the Slaney Valley, with Government at national and local level and all others who have an interest in improving the ecology, fisheries and wildlife of the river.

Please acknowledge receipt of this letter.

Yours sincerely

John Carroll  
Secretary