

08

### Licensing review and reform and Water Framework Directive-specific assessments

There must be significant reform of the aquaculture licensing and regulatory regime, particularly regarding monitoring and enforcement, akin to the Office of Environmental Enforcement in the EPA.

Licences for all existing and potential future aquaculture must be fully and independently reviewed for compliance with the WFD and MSFD, with WFD-specific assessments, to ensure that the proposed/existing farms do not compromise the water quality of the waterbody in which they are located (per the objectives of the Directives). This must also take into account cumulative impacts.

It is critical that forthcoming Sectoral Action Work Plans as part of the River Basin Management Plan include SWAN's recommendations on aquaculture, ensuring that the industry does not counter the objectives of the WFD and MSFD.

09

### End use of 15% disturbance threshold

A policy adopted by the National Parks and Wildlife Service currently allows for activities inside protected areas (other than vulnerable keystone communities) to disturb up to 15% of an entire habitat area. Appropriate Assessments (AA) and risk assessments set this as a permissible damage threshold.

This arbitrary policy is highly damaging to marine habitats and does not provide the protection to vulnerable habitats and species required by the Habitats Directive.

All government bodies must end use of the 15% disturbance threshold inside protected areas when conducting Appropriate Assessments.

## 10 SWAN RECOMMENDATIONS

01. Ban open-net salmon farming
02. Remove farmed carnivorous finfish from definitions of sustainable
03. Monitor salmon feed
04. Review National Strategic Plan for Sustainable Aquaculture
05. End EU subsidies to aquaculture and create strategic guidelines for the sector
06. Meet requirements of Nature Restoration Law
07. Include monitoring of aquaculture in Marine Strategy Framework Directive reports
08. Licensing review and reform and Water Framework Directive-specific assessments
09. End use of 15% disturbance threshold
10. Establish a transparent and independent enforcement system

## What's the Issue?

The aquaculture industry in Ireland has grown significantly since its beginnings in the 1980s, with salmon, oysters and mussels being the main species farmed in the marine environment.

The farming of these species has direct biological, chemical and physical impacts on the environment, with varying implications on water quality and wild species in our seas and rivers.

The 2025 Programme for Government includes a commitment to "continue to support the sustainable development of our aquaculture sector and modernise and streamline aquaculture licencing in the State through legislation changes."

At a time when the government is promoting growth of the Irish aquaculture industry, we believe it is more important than ever to prioritise the restoration of nature and improving water quality.

10

### Establish a transparent and independent enforcement system

A transparent and effective independent enforcement system must be established, to ensure consequences of non-compliance with regulations for the aquaculture industry (such as fines, revoking of licences, or ceasing of operations for repeated infractions).



Sea lice can spread from open-net farms to wild species of fish, including trout. Photo by Conor Folan

## About the Sustainable Water Network (SWAN)

SWAN is an umbrella network of 25 of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's water environment.

In coordination with our members, SWAN seeks to influence water and water-related policy so as to secure maximum protection for Ireland's ocean, lakes, rivers and other waterways, to meet the legal requirements of the Marine Strategy Framework Directive (MSFD), the Water Framework Directive (WFD) and other water-related policy and legislation.

For more information on SWAN's work, visit [swanireland.ie](http://swanireland.ie) or follow us on social media.



## Aquaculture in Ireland

### 10 Recommendations

Implications for meeting Water Framework Directive and Marine Strategy Framework Directive objectives and opportunities



# Aquaculture in Ireland

# 10 Recommendations

The following recommendations provide a basis for the Irish government to plan and manage aquaculture production and legislation, while reducing detrimental environmental impact and ensuring environmental objectives are achieved and maintained.

These recommendations were developed with our member organisations on the basis of our evidence report, including studies from Ireland and around the world.



Read the full report and take action here

## 01 1. Ban open-net salmon farming

Salmon farming in open-net sea pens can have a detrimental effect on wild species and the water quality of the sea surrounding cages. Ireland's wild salmon populations have decreased by 90% since the 1970s, with aquaculture a major factor in this population loss.

Sea lice on farmed fish, diseases and escaped farmed fish can all enter the natural environment and harm wild salmon populations. Pollution of the sea around cages comes from faeces and uneaten feed that falls under the nets and the antibiotics and pesticides used to treat the farmed fish.

The Irish Government must follow the example of British Columbia (Canada) and other salmon-farming regions and ban open-net salmon farming within a transition period, for the protection of wild species and benefit of the marine environment. No renewals or new licences will be permitted within that period.

## 02 Remove farmed carnivorous finfish from definitions of sustainable

Over 160 think tanks, scientists and NGOs, from six continents, including our coalition partners at Seas At Risk, have called on the United Nations Food & Agriculture Organisation to remove Carnivorous Fish Farms from their definition of 'Sustainable Aquaculture' in light of overwhelming evidence of harm to the environment, society and the economy.

The Irish Government must also remove the farming of carnivorous finfish from definitions of sustainable aquaculture, shifting production to non-fed and low-trophic aquaculture.

## 03 Monitor salmon feed

Salmon are carnivorous fish, so farms rely on wild-caught fish to feed farmed fish. This can result in overfishing, bycatch (with unintended species like dolphins caught in nets) and habitat destruction.

Where salmon-farming is in operation, there must be monitoring of feed and transparent, publicly-available information about feed contents. Feed must not include contents from unregulated or non-quota fisheries, such as sprat.

Sprat form a key part of marine food webs. By fishing them to feed farmed salmon, an important prey for whales, dolphins and seabirds is removed from the ecosystem.

## 04 Review National Strategic Plan for Sustainable Aquaculture (NSPSA)

There must be an urgent review of the NSPSA with full public participation, in particular in light of invasive alien species regulations and the Nature Restoration Law.

This must include:

- Increased monitoring to include water quality (including that conducted by citizen science) and engagement with environmental NGOs
- Investment in research on less impactful forms of aquaculture, such as land-based recirculating aquaculture systems, integrated multi-trophic aquaculture and restorative forms of aquaculture
- Ban on dredging for mussel spat.

## 05 End EU subsidies to aquaculture and create strategic guidelines for the sector

Across the EU, the aquaculture sector has received billions of Euros in subsidies, primarily through the European Maritime, Fisheries and Aquaculture Fund.

However, the European Court of Auditors found results were not in line with the amounts of funding and the industry has flatlined despite the billions in sector investment. Additionally, they noted a lack of monitoring and were "unable to find a single set of indicators allowing them to assess the environmental sustainability of the sector, despite this being one of the main objectives of EU policy."

We join our Seas at Risk partners in calling for the end of environmentally harmful subsidies to the aquaculture industry and call on the European Commission to adopt a clear set of indicators which allow auditors to assess the environmental sustainability of the aquaculture sector.

## 06 Meet requirements of Nature Restoration Law (NRL)

The NRL targets specific habitats for restoration, with legally binding targets.

The Irish Government must prioritise meeting the NRL requirements and assess the impacts of aquaculture against this.



Wild salmon populations have plummeted in Ireland, with open-net salmon farming a major factor in this decline. Photo by Jakub Rutkiewicz

## 07 Include monitoring of aquaculture in Marine Strategy Framework Directive (MSFD) reports

Future MSFD reports in Ireland must specifically monitor and measure the impact of aquaculture on descriptors including hydrographical conditions, marine litter, eutrophication, seafloor integrity and non-native species.

There must be consequences for non-compliance.

