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Our Ref:SAH/ML2

Your Ref:

Department for Environment, Food and Rural Affairs (Defra)
Marine Licensing Team
Area 2C Nobel House
17 Smith Square
London SW1P 3JR
E-mail marinelicensing.consultation@defra.gsi.gov.uk

5th January 2011

Dear Emma,

Consultation on secondary legislation for new marine licensing systems

Introduction

This letter is in response to your consultation above. It is made on behalf of Seafish.

Seafish is a non-departmental public body that provides support to all sectors of the seafood industry. It has no official mandate for involvement in resource or environmental management but has an obvious interest in the outcomes of the management processes. Seafish has a publicly stated commitment to “the sustainable and efficient harvesting of those resources on which the UK seafood industry depends, the protection of marine ecosystems, and the development of marine aquaculture based on sustainable resource utilisation and best environmental practice”.

As we are concerned only with issues which affect the seafood industry, and fishing is exempt from marine licensing much of the scope of this consultation is outside our remit, and this is why we have not responded to all questions. We would however like to make some brief comments.

Much of the consultation addresses various issues related to Environmental Impact Assessments and again this does not concern the industry as aquaculture operations are excluded from this requirement (exemption only applies to

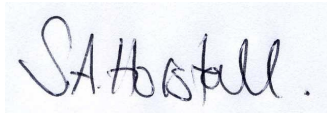
shellfish). The remainder deals with requirements under the Habitat Regulations, such as appropriate assessments which do have an impact on the aquaculture industry.

The proposed changes indicate that in future any amendments to existing consents, and any operations caught within the Aquatic Animal Health Regulations (2009) could be subject to an appropriate assessment first. Whilst we understand why these changes are necessary, we are concerned about the implications in terms of cost for the aquaculture businesses which are often very small operations.

We therefore would like to ask that these new and increased burdens are kept to a minimum, and that they are regularly reviewed so that they are affordable by the businesses they affect, and do not become a barrier either to start up businesses or to expansion.

I hope this response is useful, should you have any comments or queries, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink on a light blue rectangular background. The signature reads "S.A. Horsfall." with a period at the end.

S. A. Horsfall
Environmental Consultant