

Issue Number 11

25 April 2025

Policy Salmon Watch Ireland

**We have updated
our policies to
reflect the current
state of salmon
population declines**

**Please access our
policy statements
on the following
three topics this
week.**

Salmon Farming



Salmon Watch Ireland Newsletter

Deenish Island Aquaculture Update

Urgent Concerns Raised by Salmon Watch Ireland

Licence Breach: Introduction of Pre-Adult Salmon

The recent transfer of fish to the Deenish Island site appears to breach key conditions of the extant aquaculture licence (AQ199).

The licence strictly permits the introduction of smolts only—juvenile salmon—up to a cap of 400,000.

The recent stocking of 406,450 pre-adult salmon, each averaging 2.155 kg, appears to represent a clear breach of this stipulation. This information was provided on foot of a request for [AIE](#) (Access to Environmental Information) to the Department of Agriculture, Food and the Marine.

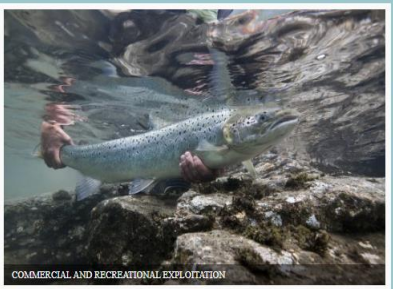
We strongly contend:

- No adult or pre-adult salmon may be transferred to the site.
- Original licence conditions remain. The farm operates under Section 19 A (4) of The Fisheries Act.
- No licence amendment is in place. Must operate under terms and conditions of original licence.

The original licence states that there is a limit on stocking at the site

- Stocking Limit: Not to exceed 400,000 smolts.
- Harvest Cap: Not to exceed 500 tonnes (dead weight) annually.
- No provision for transfer of salmon from other sea sites or outside of smolt classification.

Commercial and Recreational Exploitation



Salmon and Sea Trout Conservation Fund



Based on the transferred weight, the current biomass at the site exceeds 876 tonnes, with a potential harvest exceeding 1,600 tonnes—a drastic overreach that appears to breach environmental and harvest limits.

Environmental Impact - Local Ecosystems at Risk

This biomass overload poses a serious threat to:

- Wild salmon and sea trout smolt migration with an impact through disease and increase in parasite density.
- The survival of sea trout in the Waterville system.
- Local marine biodiversity due to increased waste, inorganic nitrogen, and disease risk.

Ongoing Appeal - Regulatory Oversight

We remind the Department that High Court proceedings involving the Department of Agriculture, Food and the Marine and the licence holder, MOWI, remain 'live' regarding a previous breach of the 500-tonne harvest limit. The current overstocking compounds non-compliance and underscores the need for immediate regulatory intervention.

We also remind the Aquaculture Licence Appeal Board (ALAB) that a current appeal is live regarding this farm and suggest that this be viewed as a further potential breach of the terms and conditions of the extant licence.

Salmon Watch Ireland demands:

- Immediate removal or harvest of the current fish stock.
- A halt to all further stocking at Deenish pending investigation.
- A transparent review of the decision-making process that allowed this transfer.

Recent Updates

16 April



Donate to Salmon
Watch Ireland

Support Salmon Watch Ireland

Donate Salmon Watch Ireland

Engagement with Department

We engaged with the Department of Agriculture, Food and the Marine on learning of this potential breach and secured a ministerial response which we believe to be inadequate.

While the Minister acknowledged our concerns and confirmed a Fish Movement Order was issued, the response failed to address the licence breaches or potential environmental harm.

We have again sent a [submission to the Department](#) and await their reply. They have acceded to our request and will examine our concerns. We await a reply.

Next Steps: EU Notification

We have informed the EU Commission and urge ALAB to consider this latest potential breach as further evidence of systemic non-compliance.

For the protection of our marine heritage, we call for immediate action.

Notes

- A fish movement order only permits movement of fish from A to B under biosecurity guidelines — it does not over-ride the conditions of an aquaculture licence.
- “Smolt” is a biologically defined stage, and 2.155 kg fish are clearly not smolts.
- Terms Under Section 19A (4) of the Act, a licensee may continue operations while a renewal is under consideration—but only in strict accordance with the terms of the original licence.
- Section 19 A (4) to be deleted from Irish Legislation – We await developments. Complaint by Salmon Watch Ireland to EU would appear to have been successful.