

Hugo Boyle (CEO) 086 - 0222090
John Lynch (Chairman) 086 - 8282762



Caitlín Uí Aodha (ViceChair) 085-2469164
Denis O'Flaherty (Secretary) 086-2700925

Ground Floor Viewmount House, Viewmount Park, Dunmore Road, Waterford, X91 NCK4.
Tel: 051 853627 Email: ISEFPO@Eircom.net

Joint Committee on Agriculture,
Food and the Marine
Leinster House
Dublin 2
D02XR20

15TH June, 2017

Ref: Sea Fisheries Amendment Bill 2017

Dear Chairman,

The Irish South And East Fish Producers Organisation object to the introduction of the above Bill in its present form. I do not intend to go into the legal technicalities but will rather concentrate and confine my comments to the practical fishing issues that would impact on our fishermen should the Bill be passed in to law.

We see this Bill as giving open unfettered access to NI vessels of any size and power to fish in our 0-6 mile exclusive Zone. This could result in extreme over fishing in this vulnerable zone that we have exclusive control over at present.

Examples of this would be where our vessels are constrained by national measures i.e. quotas, restrictions on access etc, yet, under the proposed Bill we would have no control over NI registered vessels in this same area. This would allow said vessels to fish indiscriminately for non quota species and also target quota species during periods and areas closed to our national vessels.

Access would also be a problem. We have a restriction on access in certain areas around our coast for our national vessels in that vessels over a certain size may not fish inside our 12 mile limit. NI vessels would not be subject to such restrictions under the Bill. These vessels could enter and fish in areas closed to our national fleet such as the Dunmore Box which is closed completely to herring fishing for all Irish Registered vessels of over 17 metres and for over 40+ weeks per year to all smaller vessels targeting herring. This would be an outrageous situation to find ourselves in.

At present a vessel from anywhere in the UK could Register in NI at short notice thereby complying with the Bill's stated objective in Section 1a. So in theory you could have the UK "SUPER SCALLOPERS" given open access to grounds which are off limits to our own similar vessels. I do not have to point out the resulting damage to our stocks but also this will have a major environmental impact due to the use of very heavy fishing dredges being used on delicate inshore grounds traditionally fished by our smaller vessels with static gear, for lobsters, whelks, crabs etc.

Control would also be a problem. Smaller vessels are not subject to VMS or electronic reporting. There is no facility under the Bill to make this a requirement. As a result we would not have



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accurate data on quantities of fish taken out of this zone or of the number of vessels engaged in fishing there. The same problem of policing these vessels would apply where they may enter our Internal waters ie. That zone to the landward side of our baselines.

“The Reciprocal Rights” issue that the Minister so eloquently promoted at every opportunity is dead in the water as pointed out by Senator McLoughlin during the Senate Debate on the matter. These ‘Reciprocal Rights’ would entail trading an area of 84% of an all Ireland zone for a 16% zone of indeterminate value.

While it is laudable that all fishermen from the Island of Ireland could in theory fish right around the coast and this would be in line with the Good Friday Agreement, we seem to be intent on introducing legislation with no indication of parallel legislation being introduced by the Northern Ireland Administration.

Even if the will were there to Legislate and afford us reciprocal rights I believe this could not be done in the context of Brexit. It would not be practical to pre-empt Brexit by now introducing an Open Border at sea while we do not yet know the outcome of Brexit negotiations regarding an Open Border on land.

Fishing at sea has changed dramatically in the 50+ years since the Voisinage Arrangement of 1965. All vessels even small vessels have multiples of the power that vessels had in those days and modern vessels can operate with much heavier and much more efficient gear which can decimate a fishery in a very short period of time. Giving legal status that old arrangement could never result in the outcome that was envisaged then.

As such we cannot introduce a Bill giving ‘free for all’ access in our 0-6 mile zone to what would in effect be UK fishing vessels and in our view that would be irresponsible and reckless in the extreme.

Yours Sincerely

Hugo Boyle
CEO ISEFPO