

12 June 2018

Joint Committee on Agriculture, Food and the Marine

I make this submission on behalf of the members of Killybegs Fishermen's Organisation Ltd (KFO) regarding the current discussions surrounding the Island Fisheries (Heritage Licence) Bill 2017 which is seeking to establish special fishing conditions for fishermen living on Irish off-shore islands.

KFO fully supports the concept of a special status for island residents whose livelihood is based on fishing and whose permanent residence is an Irish off-shore island. The Irish islands have a proud tradition of fishing and have produced some of our most innovative and successful fishermen for many years. Many of KFO members come from such a background and indeed are still closely connected with their island roots. KFO was fully supportive in promoting the special status of islands when the current Common Fisheries Policy was being drawn up as we are aware of the additional and extreme challenges this environment poses.

However, I must point out the flaws in the current version of the Island Fisheries (Heritage Licence) Bill 2017. The Bill in its current format would be in breach of both European Union and Irish legislation and further promotion without major amendment is pointless and only serves to delay the outcome island fishermen seek.

Firstly, a fishing licence can only be allocated to a fishing vessel; it cannot be attached to a person or group of people. An island fisherman must meet all the criteria regarding licencing that a fisherman in any other sector does.

The promoters of the Island Fisheries Bill use examples from around Europe where quota has been ring-fenced for specific groups of people, but this cannot be done in Ireland. In other countries quota is tradable and often controlled by large commercial interests but in Ireland quota is treated as a national resource and opportunities to fish it are allocated to fleet sectors throughout the 12-month year in such a way as to maximise the benefit to the largest possible number of stakeholders. It is informed by the Quota Management Advisory Committee which is drawn from the relevant stakeholders including representatives of the Inshore sector which includes island fishermen. Within this quota management system, there is provision for fishing opportunities for small-scale coastal fishers, which also includes island fishermen, but there is a problem in that those allocations are never fully exploited. Adding a further layer of bureaucracy to quota allocation by assigning it to a specific group of people (Island Community Quota) would not in itself improve the situation for islanders.

In its current form the Island Fisheries (Heritage Licence) Bill 2017 could be very restrictive for future development of an island's fishing industry. There is a specific reference to vessels with overall length of less than 12 metres and not using towed gear which could preclude island fishermen from fishing for species hitherto deemed non-commercial, but which may become commercial or from

scaling up to larger vessels in the event of and facilitated by harbour development and land-based facilities such as processing, packing for export, etc... Also, it is not clear if this Bill would limit the island fisherman to fishing within the 6nm limit of the island where resident i.e. that fisherman could not move to other areas or fisheries or use any other gear or avail of seasonal opportunities in other areas.

It is important that any special status being sought by the Irish off-shore islands does not, over time, create constraints which prevent long-term development of the sector and have a negative effect on the value of their very important asset i.e. their licenced fishing vessel.