

Submission from the National Inshore Fisheries Forum on the Impact of Brexit on Agriculture, Food and Fisheries.

The National Inshore Fisheries Forum (NIFF) welcomes the opportunity to make this submission to the Joint Committee on Agriculture, Food and the Marine.

The issue of the Impact of Brexit has been on the NIFF agenda for a considerable time now and we wish to commend the Government's commitment to date to the Fishing industry in the context of Brexit. The NIFF has taken advantage of the many opportunities it has been given to express our concerns and to be updated on the progress of Brexit negotiations through our NIFF meetings with Minister Creed. In addition the NIFF with the Producers Organisations had the opportunity to attend a meeting with the Taoiseach, the Tanaiste and Minister Michael Creed in April of this year on Brexit and also with Michel Barnier, chief EU negotiator in July of this year.

The National Inshore Fisheries Forum unlike the Producers Organisations has a relatively small defined membership and our members are representatives of consultative forums set up by the Tanaiste (when he was Minister of Agriculture, Food and the Marine in 2014) to represent the inshore sector (vessels under 12m), which comprises of 80% of Irish fishing vessels which in turn are responsible for over 50% of direct employment in the fishing sector. In terms of coastal communities the Inshore Forums membership includes representatives from the inshore fishing, aquaculture, environmental interests, processing and marine tourism. The NIFF feel that Brexit poses a significant and unprecedented threat to coastal communities and fully support the approach of linking fisheries with trade.

The greatest threats to the Seafood Sector from Brexit have been well identified as follows:

- Possible loss of access to UK waters – 40% of our fish are caught in UK waters and therefore the sector is very exposed -the necessity of maintaining access to UK waters
- Possible loss of quota share -the necessity of maintaining current quota share with respect to stocks shared with the UK
- Possible loss of market
- Potential impact on products to mainland Europe that transit through the UK -the necessity of maintaining trade arrangements

Although the inshore sector is less exposed to the first three concerns than the rest of the fisheries sector it is however exposed to secondary or "knock on effects". Most of the inshore sector fish within the 6nm limit however they are concerned that the UK's insistence on removing access for third country vessels to their 6-12 nm zone on departing the EU may displace larger vessels into the 0-6 nm zone. This is supported by the fact that in July 2017 the UK formally announced that they will be withdrawing from the London Fisheries Convention (which governs access to waters inside the 12 mile limit and predates the CFP) giving a strong indication that the UK intends to take a hard line on fisheries in the context of Brexit. This situation is further complicated by the Supreme Court judgement in 2016 ruling that found fishing by Northern Ireland boats within the zero to 6 nm zone of territorial waters under the 'voisinage' arrangements (administrative arrangements allowing reciprocal access to Irish and Northern Irish waters from the 1960s) was not permitted as it had not been legislated for appropriately. Published legislation on voisinage has been introduced into the Seanad where there has been considerable resistance to it.

The NIFF is concerned that if the UK take back their waters in the 6-12nm zone this could have a ripple effect where larger vessels are displaced into inshore waters which would have a knock on effect on smaller vessels and diversification of larger vessels into non-quota species on which the inshore sector depend. This could have devastating effects on the inshore sector.

On the last threat outlined the NIFF wish to emphasise the importance of “open borders” particularly in the context of live shellfish exports through the UK by road to mainland Europe. The inshore sector is probably more exposed to the issue of trade through the UK than other sectors as much of the produce produced by the inshore sector consists of top quality live shellfish (something you can’t add value to). This produce is not just perishable but “live” and very susceptible to delays and border checks etc. The importance of a speedy route to market is vitally important for the live shellfish trade in order to get the product to the customer in as fresh a state as possible, any delays effectively reduce the ‘shelf life’ of the shellfish during which time they remain alive. In terms of trade and routes to market for inshore products the importance of maintaining the customs union is vital.

Our members along the border with Northern Ireland have particular concerns as many of them sell their produce to Northern Ireland and the UK and are concerned about a hard border and well as any changes that may occur when exporting (more paperwork, custom checks etc.) and whether it will have any effect on prices etc. They have also expressed concerns regarding Lough Foyle and the dispute between UK and the Irish Government on jurisdiction over the Lough with the UK claiming jurisdiction up to the high water even though 25km of Donegal borders the Lough. Despite years of the Loughs Agency and cross border co-operation this issue still remains unsolved. There is concern that Brexit will exacerbate the situation and make this problem worse with effects on local fishing rights and the unresolved issues around the ‘voisinage’ arrangements.

To conclude and agree with the Brexit report 2017 from the Joint Committee on Agriculture Food and the Marine the NIFF would like to see no policy change as the most desirable outcome to the Brexit talks in regard to Fisheries. This would maintain the status quo as much as possible and allow any changes that may occur in the transitional period to happen over a sufficiently long period of time to allow the sector to adjust and take on any changes.