

**Statement to the Joint Committee on Agriculture,  
Food and the Marine  
December 10, 2019**

**Sustainability Impact Assessment of EU Commission  
Proposal**

*“Proposal for a Council Regulation fixing for 2020 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Union waters and, for Union vessels, in certain non-Union waters.”*

*– COM (2019) 483 final*

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**The Minister for Agriculture, Food and Marine:** (Michael Creed TD)

- I welcome this opportunity to present this Sustainability Impact Assessment to this Committee. As in previous years, a rigorous assessment has been undertaken to examine the implications for Ireland of the EU Commission’s proposals for the fixing of Total Allowable Catches (TACs) for the coming year.
- The EU Commission proposal was issued on the 24<sup>th</sup> of October and a number of ‘non-papers’ updating the proposal

have issued since. As the Committee will be aware, the final arrangements for 2020 are due to be negotiated at the Council scheduled for the 16<sup>th</sup> and 17<sup>th</sup> of December. The levels of Total Allowable Catch (TAC) and the quotas for Ireland will be determined at that meeting following intensive negotiations with Member States and the EU Commission.

- The waters surrounding Ireland contain some of the most productive fishing grounds in the EU. We have a duty of care to protect their biological richness and, as such, they must be managed responsibly and sustainably.
- **Ireland's total allocation of quotas in 2019 amounted to a total value of €260 million.** There are also very valuable inshore species which are not subject to EU TAC's (e.g. crab, whelk, scallop and lobster) and are fished by the Irish fleet inside our 6 mile coastal zone.
- The process of preparing for the Council is now well under way. The proposal covers stocks which are not subject to third party international agreements and are, in the main, whitefish and prawn stocks.
- Stocks which are subject to ongoing **international negotiations** are not included in the proposal as yet.

- The international Coastal States Mackerel negotiations concluded in October with agreement on a 41% increase in Mackerel quotas for 2020 in line with the scientific advice. Mackerel is Ireland's single most valuable fishery and this increase represents a Mackerel quota for Ireland of over 78,000 tonnes, worth over €80 million directly to our catching sector for 2020.
- The second round of negotiations between the EU and Norway concluded without agreement last week. A third round of negotiations will take place this week. The EU TAC for Blue Whiting has not yet been finalised pending further negotiations between the EU and the Faeroe Islands which are taking place this week. However, it is expected that there will be a small increase over 2019 with a quota of approximately 38,500 tonnes in 2020 for Ireland.
- There will be a significant reduction in the TAC for Horse Mackerel, in the region of 40%, due to the state of the stock reflecting the scientific advice for this stock.
- The quotas for these stocks are not included in the Commission proposal or the SIA, as we must wait for the conclusion of all of the international agreements.

- This year saw the full implementation of the landing obligation or “discards ban”, which has been introduced on a phased basis over the period 2015 to 2019. This is a central element of the reform of the Common Fisheries Policy and was agreed by all Member States as well as the European Parliament.
- The full implementation of the landing obligation brings an end to the dumping of perfectly good fish at sea and the catching and discarding of juvenile fish. This is a common sense goal and although the obligation comes with significant challenges we will continue to work with it.
- Another key feature of the Common Fisheries Policy is the setting of TAC and quotas to deliver Maximum Sustainable Yield for all target stocks by 2020. Maximum Sustainable Yield, or FMSY as it is more commonly known, is the largest average catch or yield that can continuously be taken from a stock under existing environmental conditions.
- In the European Union as a whole, 59 stocks are being fished at MSY levels in 2019, which has increased from 53 in 2018. In 2009, only 5 stocks were fished at MSY.
- This is a significant achievement and Ireland will continue to work with stakeholders, Member States and the Commission to

build on this tangible progress to achieve our objectives of healthy fish stocks and sustainable fishing.

## **The Proposal**

- Moving on to the proposals themselves - they are based on formal **advice received from ICES**, the independent international body with responsibility for advising on the state of fish stocks. It also takes account of the views of the (STECF) Scientific, Technical and Economic Committee for Fisheries, which gives the Commission its views on the economic, technical and social impacts of the scientific advice.
- In order to inform my negotiations at the December Fisheries Council, I have had an assessment of the impacts of the Commission proposal undertaken. To facilitate the assessment, an **open consultation** process was initiated, whereby stakeholders were asked to submit their comments and observations on the Commission proposal for fishing opportunities for 2020.
- From October 28<sup>th</sup> an online web portal on [www.fishingnet.ie](http://www.fishingnet.ie) was activated to enable the transmission of electronic submissions for consideration. This portal remained open until

November 22<sup>nd</sup> and 5 submissions were received by the closing date. The full content of all the submissions received by the deadline will be published on the fishingnet.ie website.

- In addition to the written submissions, I convened a **meeting of stakeholders – fishing industry representatives and environmental NGO's-** on the 25<sup>th</sup> of November. The purpose of this meeting was to give a further opportunity to the main stakeholders to outline their positions on the many aspects of this proposal. I would like to thank all of the various stakeholders for their contributions to this impact assessment.
- As always, there were a range of views among stakeholders. However, there were also commonalities and I agree with many of the sentiments expressed through the consultation process. These include a call for adherence to the available scientific advice to enable responsible and appropriate management decisions to be taken. This however must be balanced with the concern that major cuts to TACs could have severe socio-economic impacts.
- It is in that context, that my clear position is that I will not support cuts unless I am satisfied that they are absolutely necessary and fully supported by rigorously assessed, clear scientific evidence.

- In its proposal, the Commission has identified the ongoing concerns about a number of by-catch stocks that are in poor biological state including Irish Sea Whiting, Celtic Sea Cod and Plaice stocks and West of Scotland Cod and Whiting. We share these concerns as these stocks are important for our fishing fleet and we will continue to support measures that will help to rebuild these stocks.
- The cod stock in the Celtic Sea is at a low level and ICES has recommended zero TAC for 2020. The Commission has proposed a TAC for Celtic Sea Cod of 189 tonnes, compared to 1,610 tonnes for 2019. The reason for the low TAC proposal is because the biomass of stock is at a very low level with poor recruitment since 2012. The whiting stock in the Celtic Sea is also showing serious reductions in the biomass and recruitment has been below average since 2014. While the TAC level for whiting has not yet been proposed by the Commission because of linkages with the EU / Norway negotiations, it is expected to be reduced by some 40%. I accept that we need to take a reduction in both the whiting and cod TACs but if the cod TAC, in particular, is set too low it will lead to closure of all our whitefish fisheries where it is an unavoidable by-catch.

- We need to take measures to reduce such by-catches and rebuild both important stocks. The Commission has proposed a number of remedial measures for these Cod and Whiting stocks in the Celtic Sea. The measures proposed include a closure of the fishing grounds in the Celtic Sea from 1 February to 15 March 2020 during the spawning period and additional measures including CCTV monitoring systems on board vessels or observer coverage on vessels. These measures will not apply to fishing vessels that adopt technical conservation measures involving mesh size increases and other modifications to fishing gear. In addition, it provides for a mesh size increase for certain fisheries. We are examining these proposals with our experts from BIM, our stakeholders and other impacted Member States to understand the issues for our fleet. We will support measures that improve gear selectivity and will be effective rebuilding these stocks of cod and whiting. We will be seeking some adjustment to these technical measures where there is a disproportionate impact on the fleet in order to ensure a balanced and effective suite of measures. However, I am concerned about the proposal to introduce the specific measures relating to CCTV and observer coverage at such short notice as are all other Member States in these fisheries.
- Last week, the Commission proposed reduced TACs also combined with additional measures (CCTV monitoring or

observer coverage) for the by-catch TACs for Whiting in the Irish Sea, Cod and Whiting in the North West and Plaice in part of the Celtic Sea. We fully share the Commission's concerns regarding these stocks and will support these reduced TACs but, as already stated, Member States have concerns about the additional specific measures which have not been considered in appropriate detail.

- Apart from these issues, I also have concerns with some of the TAC level proposals – for example, the proposed cuts to Pollock in the Celtic Sea and North West of 40%. Following the consultation process and the expert advice of the Marine Institute, I do not believe that the reduction in the TAC for Pollock is either justified or necessary.
- The ICES advice for one of our most important stocks, Nephrops or prawns, shows an increase in abundance in some areas but a reduction in others. The Commission last week proposed a 15% reduction for Nephrops in Area 7. The reduction reflects reductions in the biomass of the Aran Grounds and the Labadie grounds off the south east coast of Ireland. The important Porcupine fishery is stable for 2020 and the outtake limit remains the same as for 2019.

- There is some good news in the proposal for certain stocks. Monkfish and Megrin in the Celtic Sea will see increases as will Haddock in the Celtic Sea. We are seeing a major problem with our herring stock in the Celtic sea which has almost collapsed. I am supportive of the Commission proposal to only allow a data collection commercial fishery in 2020 to allow for scientific monitoring purposes and to enable this important stock to rebuild.
- The Marine Institute and BIM have again this year made an invaluable contribution to the assessment of the Commission's proposal, which is contained in the Sea Fisheries Sustainability Impact Assessment before you today. I would like to briefly set out the findings contained in that assessment.

## **Biological Assessment**

- From a purely biological perspective, the Marine Institutes' view, which coincides with the ICES view, is that there has been an improvement in the status of some fish stocks. However, others remain a concern.
- In the Impact Assessment, the Marine Institute summaries the pressure on the 74 stocks dealt with in the 2019 Stock Book and

compares this assessment with the same evaluation presented in previous years Stock Books. There is a higher number of sustainably fished stocks (35) and percentage (47%) in 2019 compared with last year. The percentage (18%) and number of stocks (13) overfished has also increased in 2019 whereas the stocks with unknown status has remained at 26 or 35%.

- The specific details for all stocks are available in the document which will be laid before the Dáil and in the Stock Book, which was prepared by the Marine Institute and is available on their website.

### **Economic and Social Impact**

- The socio-economic impact assessment of the Commission's proposals does not fully account for Ireland's share of fishing opportunities. The current proposals exclude a number of important stocks - Mackerel, Horse Mackerel and Blue Whiting, where the final European Union TACs depend on external, third country, agreements
- If agreed as they currently stand, the Commission's initial proposal would see net reduction in fishing opportunity - quotas of minus 13% by volume and minus 13% by value. In financial

terms, this amounts to a direct income reduction of minus €8.65 million. These figures can be further explained, as follows.

- A net reduction in fishing opportunity for the whitefish sector of minus 15% by volume and minus 14% by value, with a direct income reduction of minus €8.25 million. This does not take into account the proposed 15% reduction in the very important Nephrops fishery, as the TAC for these stocks were not included in the Commission's initial proposal.

### **Regional Analysis**

- In regional analysis of Irish Sea, Celtic Sea and West coast stocks it is estimated that there will be a minus 14% decrease in fishing opportunities for the whitefish fleet. This reduction is valued at €5.35 million and will impact Kilmore Quay and Dunmore East.

### **Processing and ancillary sectors**

- In addition to the direct losses to the fleet, income is also lost from the processing sector as a direct result of reduced catches and in a number of ancillary industries (net making, chandlery, engineering, refrigeration etc).

## **Employment**

- This will obviously have a knock-on effect for employment and BIM further estimates, on the basis of the most recent employment surveys of the catching sector, that these reductions could impact 123 full and part time jobs. This could occur either through reduced incomes, partial lay-offs or redundancies in the seafood sector.

## **Hague Preferences**

- The proposals do not include the “Hague Preferences” which are a safety net for the Irish fleet on specific stocks where Total Allowable Catches (TAC’s) are in decline. Essentially, these are additional amounts of quota that Ireland and UK claim for important whitefish stocks. Many Member States object strenuously to their application as the additional quota comes off their allocations.
- Ensuring that the Preferences are applied will be a key political objective for me in the negotiations. The loss of these allocations in 2020 will amount to at least 1,216 tonnes of fish with a direct value of €2.2 million.

## **Conclusion**

- To conclude I can fully concur with the findings of the Sea Fisheries Sustainability Impact Assessment. It highlights the significant impact that the current proposals could have on the Irish fishing industry.
- Significant challenges lie ahead over the next two weeks but I will do my utmost to agree a fair and balanced package for Ireland that ensures the continued vibrancy of our industry and the long term sustainability of our stocks.
- Finally, I would like to thank and acknowledge all those who contributed to the production of this Impact Assessment, and look forward to the debate on the conclusions.
- Thank you Chair.