

IS&EFPO LTD



The stocks below are the priorities of the Irish South and East Fish Producers Organisation for the negotiations on Fishing Opportunities for 2023

Celtic Sea

Cod e-k

Although the ICES advice is for a zero catch, a bi catch TAC must be applied to ensure fisheries with mixed catches do not become choked. Cod is no longer a target species in the Celtic sea and is only seen in very small quantities in other fisheries, both catches and recruitment appear to have fallen dramatically in recent years and factors other than fishing may be putting pressure on this stock.

Haddock b-k

The SSB is high for haddock in this area and this is causing difficulty with vessels on the ground as good catches of haddock are seen across the Celtic Sea. A reduction of 25% in catch advice if it follows through with a cut of 21% in the TAC for 2023 will have the effect of reducing the number of vessels using the raised footrope to reduce cod catches as there will not be enough haddock quota available to have a target fishery to make this gear option viable.

Whiting b-c / e-k

Although the advice for whiting 7b-k is for catches of no more than 1715t this stock will benefit from the enhanced technical measures introduced in the Celtic Sea in 2020 and again in 2021. However if the management area is eventually split from 7d this will present a huge challenge for this important fishery for the Irish fleet.

Plaice 7f+g

A cut of 77% here in the advice will cause us huge difficulty if it follows through in the TAC. Looking at the ICES advice the priority here should be to reduce the level of discards.

Sole 7f+g

Although the stock advice here is for a roll over this is a huge problem stock for Ireland as we have only a 3% share of the overall TAC and 4.4% of the EU TAC. The CFP review group made certain recommendations which could increase Ireland's share of this stock. A fresh look at invoking a Hague preference for Sole f+g must be considered as it is indefensible that Ireland has such a minute share in this valuable fishery.

Monk 7

Although the advice for monk 7 is for an increase of 10% this is an important fishery in Ireland and we did take a reduction of 7% in the TCA which is forcing us to look for swaps to keep the fishery open. We should explore some mechanism for rebalancing of this stock as there are member states underutilising their quota.

Hake Northern

An increase of 11% in the advice here implies a TAC increase of only 3%. This stock was benchmarked this year and ICES have now stated that the stock size was under estimated by 71%. This under estimation resulted in the TAC being cut by 27% for 2022. If we are to follow the science and the advice is to remain relevant the 27% reduction in TAC for 2022 should at a minimum be reversed. This is an important stock for Ireland as we have only 7% of the EU TAC.

Nephrops 7

Nephrops is Ireland's most commercially important demersal fishery and any reduction in TAC here particularly in FU16 has serious implications for the viability of the fleet. Ireland took a 14% reduction to our Nephrops quota as a transfer to the UK in the TCA. This reduction will continue to have a negative impact on the fishery in 2023. The Irish fleet catches almost 100% of its Nephrops quota allocation every year due to our proximity to the source. A mechanism to have some rebalancing on Nephrops with member states with unutilised quota should be sought for nephrops to redress the unfair burden carried by Ireland in the Brexit transfer to the UK.

Irish Sea

Cod 7a

With Cod in 7a being returned to a category one assessment the advice is now for zero catch in 2023. A bi catch quota in line with that for 2022 must be maintained to allow other mixed fisheries to be prosecuted. Serious consideration should be given to a full and open review of the Irish sea cod closure which was introduced in 2000 to rebuild the stock but has had no positive effect on the stock.

Haddock 7a

The spawning stock is high for haddock in 7a. there was no NIMIK survey carried out in 2020 due to covid restrictions and this has the perceived effect of low recruitment. Recruitment for 2021 and 2022 appears to have recovered. Reports from fishermen would indicate that there are fish on the ground but they are smaller than in previous years. This may be pointing to an increase in the quantity of bigger haddock in the Irish Sea in the years ahead. We should keep any cut here to a minimum until the science can catch up and avoid the risk of having a large stock of haddock with no quota to catch it, which would run the risk of a choke in the Nephrops and mixed fisheries.

Whiting 7a

Whiting 7a has been the focus of much research and advances in technical measures since the early 1990s in an attempt to reduce the unwanted catches of undersize fish in the nephrops fishery with varying degrees of success. Work is ongoing in this area with BIM to try to come up with a technical solution to this problem. Unfortunately the advice is for a zero catch once again in 2023, however a bi catch is necessary for whiting 7a to allow Nephrops and other fisheries to operate and to facilitate the ongoing work on whiting selectivity.

Plaice 7a

The proposed cut of 30% to the plaice TAC in 7a is not in line with the condition of the stock but appears to evolve from estimated high discards of below MCRS fish. Reducing the TAC here will have no impact on increasing the size of fish in the plaice stock for 7a.

West of Scotland

Cod 6a

Like the cod stocks in the other zones around Ireland cod the advice for cod in 6a is for a zero catch. A bi catch quota will be required here to allow other mixed fisheries to operate without becoming choked for cod.

Megrim 4a and 6a

Considering this stock is in very good condition a roll over should be applied for megrim in this stock area and the advice for Megrim in 6b can be evaluated when it becomes available in the autumn.

Skates and Rays

Ray is an important target fishery for certain sectors of the Irish fleet including smaller inshore operators but are mostly caught as bi catch in many fisheries. This presents a huge challenge for the landing obligation and the North Western Waters Advisory Council is continuing to work to have management measures established to protect vulnerable skates and rays in the North East Atlantic Regions. Both the abundant and vulnerable species vary depending on the region or sea basin and this makes protection by using the prohibited species list impossible unless this is done on a regional basis. There has been and are ongoing trials to assess the level of survivability for skates and rays which are released post capture. The results vary from species to species and there has been many steps taken to improve systems and conditions for handling the fish on board and during their journey to the storage facility. Some of this work has been delayed as a result of the covid restrictions during 2020 and 2021. However it is important that the survivability exemption for skates and rays is maintained beyond 31st December 2023 to allow this work to continue.

Picked Dogfish

This year ICES has given advice that catches of Spurdog should be no greater than 17,353t. Spurdog should now be removed from the prohibited species list and a quota or bi catch established to allow landings in line with ICES advice.

Pelagic

Mackerel

The declaration of unilateral quotas by Norway, Iceland and the Faroe Islands is not acceptable and the EU should recognise the serious threat that this is to the sustainability of the Atlantic Mackerel stock. This behaviour is causing the Mackerel stock to be overfished and should be opposed by the European Commission up to and including the imposition of trade sanctions on Norwegian fishery products being imported into the European Union.

Blue Whiting

The ISEFPO supports the Minister and the Departments position on Norwegian access to fish for blue whiting in the Irish EEZ. There must be some concession to Ireland if we agree this access.

John Lynch
ISEFPO