

Submission on the Review of the CFP

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This submission is made on behalf of Comhar na nOileán Teo, the newly formed LEADER / Partnership Company for the inhabited offshore islands of Ireland¹.

Ireland is considered to have 33 inhabited islands located around the coast of Ireland; one off the coast of Co. Antrim, Northern Ireland, and the remainder off the coast of the Republic of Ireland. These islands support a combined permanent population of approximately 2,900, with numbers per island ranging from as few as 10 to over 800 people. Seventy-five per cent of this population lives on the 12 Gaeltacht islands – islands where the predominant language and culture is Gaelic.

Lying along the Atlantic seaboard of Ireland, the sea and fishing has naturally formed a key part of the economy of these islands, and seafaring and fishing has contributed to the traditions and heritage of the people of these islands. Whilst subsistence agriculture and fishing still forms a component of the economies of these islands, cash cropping (including fishing) and the revenues derived from tourism are now of rather greater importance. To this end, on an annual basis fishing generates in the order of €3.75 million to these small and fragile economies. Until this fishery was closed a few years back, the drift-netting of salmon contributed a further €300,000 per year, notably to the island of Árainn Mhór, a source of income that it has been impossible to replace.

It would be reasonable to suggest that these islands, their people and their economy, lie at the periphery of the periphery of Europe. The ecosystems associated with these islands are fragile; the way of life of the islanders is fragile; and the economy of these islands is fragile. And against the many pressures of a modern market economy that challenge the viability and sustainability of these islands, these islanders continue to act as stewards of these islands. Further, in terms of the Gaeltacht islands the way of life, language and traditions of these islands embody the very core of Irish tradition and heritage. Yet the traditions and viability of these islands are being eroded and weakened year by year.

The case for retaining a vital culture and economy on these islands, and maintaining the continuation of a long-established island and national heritage, is mixed. On the one hand these island communities can be viewed as anachronistic, a throw-back to earlier more rugged times, and therefore something that does not really have a place in the modern State. On the other hand they can be viewed as holding characteristics that are held in high esteem – in Ireland, and much further afield – which play an important role in mix that forms Ireland's diverse coastal economy; and which should be maintained – not as museum pieces, but as vibrant and critical elements of modern Ireland. Thankfully the latter position holds sway, and the over-whelming view is that these island communities should be retained and cultivated, and to this end there is a national political and economic commitment to support and strengthen these island communities. Yet there remains confusion in the delivery of these commitments – some policies support this commitment, others undermine it. Fisheries policy is one area that, as currently structured, tends to undermine it.

There are a number of areas of fishery policy and public funding rules that work against islanders:

¹ *This submission draws on two studies commissioned by Ireland's offshore island communities to examine the current status and future for the islands' fisheries:*

- *MERC Consultants (2009) A Review of fisheries on Ireland's offshore islands: Sustaining island livelihoods*
- *Nautilus Consultants / MERC Consultants (2007) An Assessment of Fisheries on the Gaeltacht Islands of Ireland: sustaining island traditions - available to download at <http://www.oileain.ie/en/Publications>*

problem

- islanders exploit marine resources in the immediate environs of the islands, but they do not have exclusive access to these fisheries, and the impacts of their sustainable practices are under-mined by the opportunistic activities of other fishermen – of other fishermen who gain advantage from the good stewardship of the islanders, but who also have the opportunity to fish in other areas, areas that are not so easily exploited by the islanders;

- Irish fleet policy, driven by EU policies to control and reduce fleet capacity, act to undermine the viability of island fishing – by requiring the retirement of fishing licenses, blocking the modification of the islander fleet to better match local fishing opportunities, removing the flexibility to exploit a range of local fishing opportunities, and removing the flexibility to mix commercial fishing with angling and other forms of marine tourism:
 - ▷ most islander fishermen operate with a potting license to which is attached a “sunset” clause – the license must be retired at such time as the current licensee ceases to utilise the license; this form of license applies to a specific fleet metier designed to achieve compliance with agreed national fleet capacity limits – but has the unintended consequence of undermining the medium and long-term viability of island fisheries;

 - ▷ capacity limits, licensing restrictions, and policies against the use of public funds in modernising and upgrading the the fleet have a detrimental impact on the islander fleet – both in facilitating upgrading and improvements in the safety characteristics of this fleet, and accommodating changes (expansion) in the capacity of this fleet to better align it with the fishing opportunities available; these comply with policies that are appropriate with fishing activity in general, but which unreasonably constrain the viability of the islander fleet;

possible remedy

islanders seek exclusive use rights in the waters immediately surrounding these islands; this is in-line with policy objectives of stewardship, co-management, and sustainable exploitation, and also meets objectives in the integration of marine resource management; it does not, however, form an accepted part of fishery management practice, despite its relevance to a large number of situations across the European Union, and its application in the form of Marine Protected Areas for the purposes of resource protection and conservation, and its application at a slightly greater scale in the management of territorial waters around small islands (cf the Shetland Islands Regulating Order)

need for a more positive and supportive policy towards island fishing, taking a more informed view of the role of fishing in underpinning the long-term sustainability of island fishing, and the need to retain a fleet capacity in line with available resource opportunities, and the fishing licenses appropriate to that task; under the current system, island fishing is artificially constrained and penalised for the excesses of other components of the Irish fleet.

re-designate the islander fleet as a special case within the context of an integrated marine development plan for the offshore islands drafted specifically to meet the national policy objectives to support the long-term sustainability of Ireland's offshore islands; this special case status should be accompanied, where necessary and appropriate, by the reallocation of modest national fleet capacity to allow for further development of the islander fleet, and sanction the use of modest public funding to both assist in the reallocation process and facilitate appropriate development of the islander fleet.

- ▷ most islander fishing vessels operate against a potting license which precludes them from exploiting seasonally and locally available finfish resources; whilst it is recognised that this restriction has been put in place for sound policy purposes, it is argued that this is an unreasonable and counter-productive constraint on the activities of the islander fleet in particular;

it is argued that a more flexible license should be made available in the special case of the islander fleet, where fishing opportunities are in any case geographically (and seasonally / weather) limited, and where such policy runs contrary to the policy to support and sustain the island communities and economies as viable entities; whilst it is recognised that this is a “special case” plea, there is good policy rationale to this, and that the provision of such a flexible license should only be countenanced within the context of the allocation of specific user rights, and within a coherent fishery / marine management plan for a bounded area around each island.
 - ▷ in the same way as the potting license places an unnecessary and unreasonable constraint on islander fleet activity, so does the policy not to allow vessels licensed to undertake commercial fishing to also be allowed to carry passengers – for example for angling or marine tourism purposes; whilst it is entirely reasonable to require that safety and public liability considerations have to be addressed, it is felt that this policy is inflexible and unreasonably excludes the reasonable use of these vessels for a range of purposes.

whilst it is recognised that this policy is derived in part from an unfortunate and unusual marine accident case, its application to the circumstances, historical practices and traditions of these offshore communities severely limits the economic opportunities open to islanders – where economic life is heavily dependent on flexibility, and on undertaking or participating in a number of different economic activities across the year.
- because of the fragility of the economies of these island communities, individuals, families and households are often poorly equipped to raise the funds to respond to investment opportunities that occur in the short term, but which require immediate response – acquisition of licenses, tonnage, vessel replacement, etc., but States Aid rules place constraints on the extent to which public funds can be deployed to cover for such eventualities, most notably in the area of community investment in and ownership of assets; provision of support and raising funding through community structures form a key part of the traditions and economic structure of these communities, but this type of system is not supported within public policy – to the detriment of these communities;

at the very least there is need for increased clarity in the application of public funds in support of funding / management of investment vehicles used to support improvement of the fleet, investment in industry infrastructure, underwrite loans for purchases and licenses, and the community ownership of assets that can then be leased to individuals or business entities; once again there appears to be conflicting policy in this regard – recognition of the fragility of these communities and a commitment to support their economic viability, but a constraints on the deployment of public funds to this end.
- there is also a case for treating some of the fisheries of these offshore islands as heritage fisheries, on the basis that many islanders still maintain the tradition of using island made currachs (a canvas covered longboat) as their main means of fishing; this has been developed over the centuries to meet the particular

there is a strong argument for supporting the retention and continued use of these vessels in economic fishing on the grounds of retaining the skills and traditions of this type of fishing; in an era of anti-subsidy, it can be difficult to offer financial support for the retention of such skills and traditions; there are perhaps thirty such

conditions found on the islands – the need for a light weight vessel to allow it to be removed from the water after use, whilst retaining seaworthiness in keeping with local sea conditions.

currachs in common use on the islands in what is a declining practice.

- islanders have been stewards of the islands and island surrounds for many centuries, applying a conservative and precautionary approach to land and marine use; the diverse and healthy seas and marine life found around these islands is in part down to the good management of these areas by the local communities, and primarily by its fishermen; the impact of this stewardship is being eroded by unconstrained encroachment by non-island fishermen who do not apply the same conservative approaches to marine management;
- as with systems of payment for good stewardship of sensitive terrestrial environments, there is a good case for the provision of similar support for the conservative, precautionary and sustainable management of marine resources – by fishermen and coastal communities; in line with the concept of exclusive use rights, there is also a good argument for recognition of the stewardship services provided by these island communities and their fishermen in support of the maintenance of biodiversity and the continued health of these fragile environments.

In most, if not all, of the above it is within the powers of the Irish government to resolve this situation, but up until now there has been no precedent established for the special treatment of offshore islands. This situation is not unique to Ireland – small offshore islands and associated communities and associated vulnerable economies can be found across Europe, and face similar conflicts between different strands of policy, in part driven by the need to comply with different strands of EU policy, and in part due to varying interpretations at the national level. But there are few examples of islands that are quite as peripheral or fragile as those of the Irish offshore islands.

It is recognised that many fishery dependent communities can argue that they should be treated as a special case, and that the CFP Reform Green Paper does explore the possibility of more specific treatment of coastal and small-scale fisheries. We applaud and support such an initiative, and believe that there is greater need for support from the CFP for more locally based management of fisheries, and recognition of the greater likelihood that local management involving both fishery managers and fishermen – co-management – is better placed to deliver responsible and sustainable management and exploitation of locally available marine resources, and better placed to contribute effectively to processes of integrated marine management. We also support policy strands that encourage flexibility in how European and regional policy can be delivered at the local level - flexibility to accommodate policies that support to varying degrees social goals alongside economic goals.

But:

- ▷ there remain major gaps between policy statements within the CFP in support of fishery dependent coastal communities, small-scale fisheries, co-management, and integrated marine management, and delivery on these statements at the local level – this is not just a local or national issue, it presents a major weakness in the drafting of the CFP; this is not an aspirational document, but a blue-print for the management of fisheries within this domain, and it needs to include provision of the wherewithal to deliver on the policies;
- ▷ we also believe that even within an inshore management regime the particular status of fishery dependent small-island communities is a “special case” - supported by other strands of public policy, but one that is insufficiently supported by fishery policy; establishment of bounded zones around these islands, and allocation of user rights to these island communities – essentially Marine Protected Areas for island fishermen – could provide the sort of economic environment in which the rewards of good management could be reasonably reaped by the island fishermen; as matters stand island fishermen and their communities seem to be penalised for their responsible behaviour.

Fig 1 – the offshore islands of Ireland

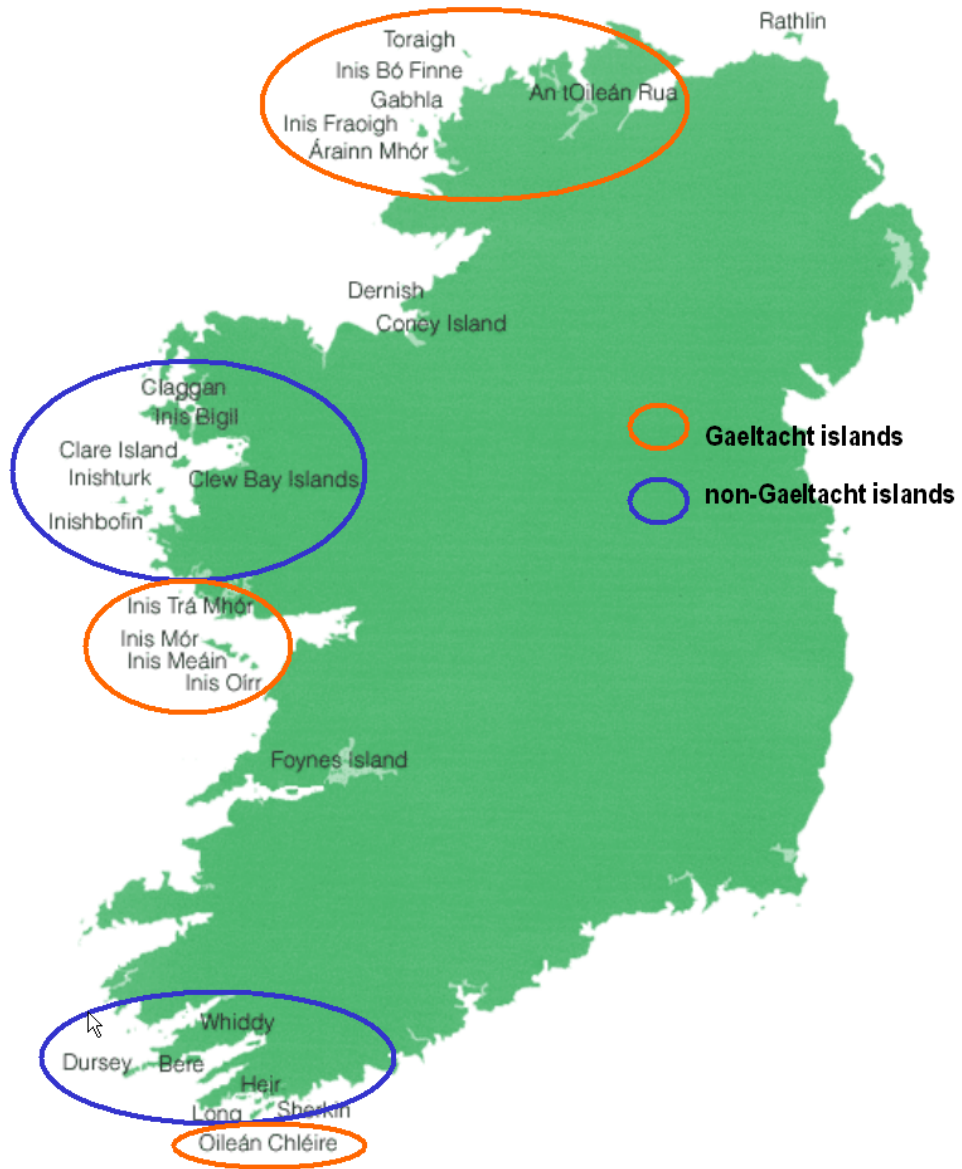


Table 1 – Populations of Ireland's offshore islands

County	Island		Population*	No of permanent	No of visitors
Antrim			70		
	Rathlin	non-Gaeltacht	70	26	20-30,000
Donegal			720		
	Árainn Mhór	Gaeltacht	543	136	20,000
	Toraigh	Gaeltacht	149	37	12-15,000
	Inis Bó Finne	Gaeltacht	16	4	200
	An t-Oileáin Rua	Gaeltacht	7	2	5
	Gabhla	Gaeltacht	5	1	50
Sligo			7		(approx)
	Coney	non-Gaeltacht	6	2	0
	Derrnish	non-Gaeltacht	1	1	,500
Mayo			136		
	Clare	non-Gaeltacht	136	47	20-50,000
	Inishturk	non-Gaeltacht	58	22	<5,000
	<i>Inishlye</i>	non-Gaeltacht	7	3	<200
	<i>Inishcuttle</i>	non-Gaeltacht	3	1	0
	<i>Clynish</i>	non-Gaeltacht	5	2	0
	<i>Inishqort</i>	non-Gaeltacht	1	1	0
	<i>Inishnaklillew</i>	non-Gaeltacht	3	1	0
	<i>Islandmor</i>	non-Gaeltacht	1	1	0
	<i>Clagqan</i>	non-Gaeltacht	4	2	0
	<i>Collanmore</i>	non-Gaeltacht	1	1	0
	<i>Inishturk Beg</i>	non-Gaeltacht	10	4	0
Galway			1411		
	Inishboffin	non-Gaeltacht	199	50	50-80,000
	Inis Mór	Gaeltacht	763	254	300,000
	Inis Oírr	Gaeltacht	262	87	50,000
	Inis Meáin	Gaeltacht	187	62	10,000
Cork			479		
	Oileáin Chléire	Gaeltacht	129	32	10,000
	Bere	non-Gaeltacht	187	44	15-20,000
	Whiddy	non-Gaeltacht	22	8	<1,000
	Dursey	non-Gaeltacht	6	3	<1,000
	Heir	non-Gaeltacht	24	12	<2,000
	Sherkin	non-Gaeltacht	106	34	5,000
	Long	non-Gaeltacht	5	3	<500

Table 2 – Estimated landings – Gaeltacht islands 2005; non-Gaeltacht islands 2008.

			Lobster	Crawfish	Brown crab	Velvet Crab	Spider crab	Prawns	Shrimp	Whitefish	Mackerel	Salmon	Scallop	Flat Oyster	Mussels	Winkles
			(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(Kg)	(doz)	('000s Kg)	(Kg)
Donegal																
Árainn Mhór	Gaeltacht	2005	10,000	4,000	300,000	5,000		na	na			15,750	na	na	na	na
Toraigh	Gaeltacht	2005	2,000	500	250,000			na	na			400	na	na	na	na
Inis Bó Finne	Gaeltacht	2005	4	250	600,000			na	na			1,500	na	na	na	na
An t-Oileáin Rua	Gaeltacht	2005						na	na				na	na	na	na
Gabhla	Gaeltacht	2005	3,500	250	5,000			na	na			1,000	na	na	na	na
County Mayo																
Inishturk	non Gaeltacht	2008	14,400	500	31,250	-		-	2,400	-	1,200		-	-	-	-
Clare Island	non Gaeltacht	2008	4,500	350	12,000	-		-	850	-	600		-	-	-	500
Clew Bay (Inishlyre / Clynish)	non Gaeltacht	2008	860	-	-	-		-	2,800	-	-		-	1,000	-	7,500
County Galway																
Inis Mór	Gaeltacht	2005	12,000	500	30,000		2,000	na	na	2,000	500	200	na	na	na	na

Inis Oirr	Gaeltacht	2005	7,000	250	4,000		1,000	na	na	1,500	250	na	na	na	na	
Inis Meáin	Gaeltacht	2005	5,000	100	1,000			na	na	1,000	100	na	na	na	na	
Inishboffin	non Gaeltacht	2008	1,650	50	500	-		-	-	-	-	-	-	-	2,500	
County Cork																
Oileáin Chléire	Gaeltacht	2005	4,000	150	2,000		1,500	na	5,000	15,000	na	na	na	na	na	
Dursey Island	non Gaeltacht	2008	900	130	950	-		-	600	1,200	600	450	-	-	-	
Bere Island	non Gaeltacht	2008	1,800	-	2,500	3,500		-	5,800	-	500	4,100	-	384	1,000	
Whiddy Island	non Gaeltacht	2008	-	-	5	-		1,475	3,150	-	-	1,125	-	150	-	
Long Island	non Gaeltacht	2008	250	-	-	-		-	1,212	-	-	600	-	-	600	
Sherkin Island	non Gaeltacht	2008	320	-	-	-		-	850	-	-	-	-	120	500	
Heir Island	non Gaeltacht	2008	2,250	-	6,000	5,500		-	5,515	-	-	-	-	-	1,000	
Totals			70,434	7,030	1,245,205	14,000	4,500	1,475	28,177	20,700	3,400	19,200	6,275	1,000	654	13,600

Table 3 – Estimated value of landings, based on estimated volume of landings and unit prices

				Value €/kg	€ 12.50	€ 35.00	€ 1.25	€ 2.20	€ 2.50	€ 10.00	€ 14.00	€ 2.60	€ 0.89	€ 15.00	€ 12.50	€ 5.00	€ 800.00	€ 1.50		
					Lobster	Crawfish	Brown crab	Velvet Crab	Spider crab	Prawns	Shrimp	Whitefish	Mackerel	Salmon	Scallop	Flat Oyster	Mussels	Winkles	€ Total	
Donegal																				
	Árainn Mhór	Gaeltacht	2005	€ 125,000	€ 140,000	€ 374,999	€ 11,000							€ 236,250						€ 887,249
	Toraigh	Gaeltacht	2005	€ 25,000	€ 17,500	€ 312,499								€ 6,000						€ 360,999
	Inis Bó Finne	Gaeltacht	2005	€ 50	€ 8,750	€ 749,997								€ 22,500						€ 781,297
	An t-Oileáin Rua	Gaeltacht	2005																	
	Gabhla	Gaeltacht	2005	€ 43,750	€ 8,750	€ 6,250								€ 15,000						€ 73,750
County Mayo																				
	Inishturk	non Gaeltacht	2008	€ 180,000	€ 17,500	€ 39,062					€ 33,600		€ 1,067							€ 271,229
	Clare Island	non Gaeltacht	2008	€ 56,250	€ 12,250	€ 15,000					€ 11,900		€ 533					€ 750		€ 96,683
	Clew Bay (Inishlyre / Clynish)	non Gaeltacht	2008	€ 10,750							€ 39,200				€ 5,000			€ 11,250		€ 66,200
County Galway																				
	Inis Mór	Gaeltacht	2005	€ 150,000	€ 17,500	€ 37,500		€ 5,000				€ 5,200	€ 444	€ 3,000						€ 218,644

Inis Oírr	Gaeltacht	2005	€ 87,500	€ 8,750	€ 5,000	€ 2,500		€ 3,900	€ 3,750				€ 111,400				
Inis Meáin	Gaeltacht	2005	€ 62,500	€ 3,500	€ 1,250			€ 2,600	€ 1,500				€ 71,350				
Inishboffin	non Gaeltacht	2008	€ 20,625	€ 1,750	€ 625						€ 3,750		€ 26,750				
County Cork																	
Oileáin Chléire	Gaeltacht	2005	€ 50,000	€ 5,250	€ 2,500	€ 3,750	€ 70,000	€ 39,000					€ 170,500				
Dursey Island	non Gaeltacht	2008	€ 11,250	€ 4,550	€ 1,187		€ 8,400	€ 3,120	€ 533		€ 5,625		€ 34,666				
Bere Island	non Gaeltacht	2008	€ 22,500		€ 3,125	€ 7,700	€ 81,200		€ 444		€ 51,250	€ 307,200	€ 1,500	€ 474,920			
Whiddy Island	non Gaeltacht	2008			€ 6		€ 14,750	€ 44,100			€ 14,063	€ 120,000		€ 192,919			
Long Island	non Gaeltacht	2008	€ 3,125				€ 16,968				€ 7,500		€ 900	€ 28,493			
Sherkin Island	non Gaeltacht	2008	€ 4,000				€ 11,900				€ 96,000	€ 750		€ 112,650			
Heir Island	non Gaeltacht	2008	€ 28,125		€ 7,500	€ 12,100	€ 77,210					€ 1,500		€ 126,435			
Totals			€ 880,425	€ 246,050	€ 1,556,500	€ 30,800	€ 11,250	€ 14,750	€ 394,478	€ 53,820	€ 3,022	€ 288,000	€ 78,438	€ 5,000	€ 523,200	€ 20,400	€ 4,106,134