



# Údarás Réigiúnach an Iar-Dheiscirt South West Regional Authority

**Preliminary submission on the Reform of the  
European Common Fisheries Policy.**

**December 2009**

## **Introduction**

The South West Region of Ireland, comprising Cork City and the Counties of Cork and Kerry has an area of approximately 12,100 sq. kilometres. The region has a population of approximately 644,000 persons.

Much of the modern economic activity in the region is centred on Cork City and its environs and in the Tralee Killarney area of County Kerry.

In coastal areas of the region, fishing is an important economic generator, with the principal regional fishing ports at Castletownbere, Union Hall, and Dingle, together with a range of smaller ports which also support a local fishing industry.

The operation of the European Common Fisheries Policy in the South West region has resulted in the curtailment of the fishing effort, loss of fisheries income and loss of direct and indirect employment in the fisheries sector.

The South West Regional Authority, while identifying the challenge to make the sector a more economically viable one also clearly recognises that threats do exist to stock levels and that Common Fishery Policy must address both the economic and sustainability parts of the fisheries debate.

The Common Fisheries Policy (CFP) was last revised in 2002, to address issues of sustainability in the European Fishing Industry and at that time new measures were introduced to prevent over exploitation of the resource and to generally protect marine ecosystems. It also recognised the need to provide a sustainability livelihood for those whose income was derived from fishing and aquaculture.

The 2002 reform of the CFP opened for a more long-term approach to fisheries management, involving the establishment of multi-annual recovery plans for stocks outside safe biological limits and of multi-annual management plans for other stocks. It aimed to progressively implement an eco-system-based approach to fisheries management.

In 2008, the Commission launched a review of the Common Fisheries Policy which will be based on an analysis of the achievements and shortcomings of the current policy, and will look at experiences from other fisheries management systems to identify potential avenues for future action.

The South West Regional Authority recognises the significant importance of the fishing industry to the more peripheral coastal areas of the region, where in many instances there are few alternative opportunities to create or sustain employment. The authority also views that the industry has not maximised its potential economic outputs, based on current and historical levels of landings and this is an issue which needs to be addressed in terms of developing added value, shore based employment and through the industry generally making a much stronger contribution to the economic sustainability of coastal areas of the region.

## **Some key issues in the South West**

A number of important issues exist in the South West in relation to the regional fishing industry, these are as follows.

### Export of the resource.

Of key concern is the fact that the vast majority (c.80%) of all sea fish landings in the region are exported from trawler to shipping container. Much of these exports go to Spain.

The Regional Authority views that it is very important from an employment perspective that fish landings into regional ports are maximised, within the limits of sustainable catch parameters; and that these fish are subsequently retained in the region for processing, where appropriate preferable to the level of finished shelf products.

Notably, much of the fish (raw and processed) being consumed in the South West is imported, with total Irish imports valued at approximately €116 Million in 2004. This clearly highlights a position whereby the majority of fish consumed in this region are imported, while the majority of fish caught are exported. This is a totally unacceptable situation and the continued export of the regional fish resource, is not sustainable particularly in light of the volumes of fish and fish shelf product being imported into the south west for sale.

### Quota allocation

Another important issue exists in terms of the regional share of the polyvalent sector, where to an inordinate degree quota allocations are made to the Killybegs fishing fleet, in County Donegal. Irish national policy needs to move towards a more equitable distribution of the national fisheries quota in species such as mackerel. Furthermore national policy needs to ensure that polyvalent catches by the fleet are landed into Irish ports, where the resource can create much needed employment in coastal communities. As matters stand much of the polyvalent sector catch is landed in ports in Scotland and Norway- thus greatly diminishing the value of the resource, not perhaps to the individual skipper, but significantly so to the Irish economy and local communities.

As white fish stocks levels recover, it will be important to have regulations in place to retain catches in Ireland for processing.

### 12 Mile Nautical Zone

Ireland has always resisted any opening up of the 12 miles zone to other European Fishermen. The South West Regional Authority recommends the extension of this protected area to protect fish stocks and to ensure that a resource of significant volume is made available to build a strong fish processing industry in Ireland.

The Authority proposes that all Member States should have a coastal protected zone of not less than 24 miles, with access only for vessels owned and registered in the Member State. These restricted zones should be subject to European Common

Fisheries Policy Regulations, however regulations need to be amended to prevent the discard of dead fish.

### Discard of catch

It is suggested that some system be considered whereby the retention of dead fish incurs some offset in other quota or otherwise some level of penalty, but not to an extent whereby it is in the economic interest of the fisherman to dump the fish at sea.

### Market Based Individual Quotas

The South West Regional Authority strongly opposes the introduction, as suggested of any market based individual based quota system. It is important to realise that fish stocks are a national asset and not a private resource of the Sea Fishing Community. We call on the Irish Government to strongly resist and veto any move towards a European Fishing Fleet, whereby for individual short term gain, quota could move to foreign owned vessels. We submit that quota should be assigned on a national or regional basis.

The authority recommends that some mechanisms be introduced to require that quota allocations take into account the levels of potential added value which can be achieved within the region to which that quota allocation refers. It might be considered that for a Skippers/owners to receive a quota allocation, they would have to demonstrate that they have processing facilities available within the region. This would guarantee a supply of locally caught fish and would incentivise the development of modern fish processing in the region and nationally.

### Decommissioning of vessels.

Within the South West, significant decommissioning has taken place in the polyvalent Fleet. This has resulted in a position whereby the number of trawlers operating, for example, from our principal port at Castletownbere has declined from a level of 65 boats in 2003 to 30 boats in 2008, with a consequential loss of 175 jobs. Similar pro rata employment losses will have been experienced in other regional ports.

While the decommissioning of vessels is intended to strengthen the viability of the remaining fleet, the absence of an effective shore side industry prevents the creation of new employment opportunities for displaced fishermen or their families. We also submit that the withdrawal of a fishing trawler should not necessarily result in its destruction and that options should be provided for such vessels to change use to pleasure craft or working craft in sectors other than fishing.

### **Conclusions**

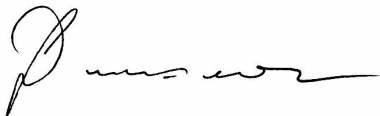
The sea fisheries aspects of the South West regional economy has been in steady decline since the introduction of the European Common Fisheries policy. It is fully acknowledged that the CFP has taken important measures to ensure the long term sustainability of fish stocks and marine eco-systems, nevertheless European Fishery Policy has been very detrimental to the sector in Ireland and in this region. Much of this decline can be attributed to the fact that Ireland, as a small peripheral and maritime member of the European Union did not successfully or adequately negotiate and protect its position with the CFP.

Nor has the region maximised its potential in terms of the fishing industry, with raw fish exports dominating the sector, while fish for Irish and regional consumption is imported. Similarly, little appears to have been achieved in terms developing fish traceability, so that we can for example identify in our restaurants where a fish originated.

The operation of the sector has mainly favoured the individual Skipper/owner rather than the community and a national resource is being used to create employment elsewhere, through the export of raw fish in very large volumes. This is a resource which should be used to create employment and sustain economic growth in coastal communities.

The South West Regional Authority contends that in the context of a changing economy, the Commission and indeed the Irish Government needs to take a new approach to fisheries and this approach should be much more nationally and regionally focused, to ensure that the valuable resource, which our fish stocks represent, are used to create employment and added value in the Irish economy.

This is a preliminary submission by the South West Regional Authority, which has noted that the process in reforming the European Common Fisheries Policy will continue until 2012. It is the intention of the regional authority to further engage with interests within our own region, nationally and with the European Commission, in helping to formulate reforms which will clearly identify and support the importance of the fisheries sector to a wider range of stakeholders within European regions.



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