The following submission is from the National Inshore Fisheries Forum (NIFF)

Union Priority 1 Sustainable Development of Fisheries

The Action Plan for Small Scale Coastal Fisheries (SSCFs), while a necessary measure under the EMFF is a welcome addition to the proposed Seafood Development Program. It is broad and covers the majority of the issues facing the SSCF, however our biggest concern is that there will be insufficient funding to implement it fully. It is imperative that a large, specific fund be made available in order for the action plan to be fully implemented. Drawing up the plan without resourcing it adequately is not good enough. Full implementation is the only way of enabling SSCF to contribute fully to the targets set out in Food Harvest 2020, and in order to do this it needs to be comprehensively funded. The consultation document makes several references to other schemes and funds such as FLAG for example, for the implementation of the Plan. However at sectoral level the investment needs to be targeted and deliver on specific objectives. Putting these deliverables in jeopardy by asking them to be addressed through a community led local development approach is unfair to both priorities. The problem from our point of view is that these schemes require a considerable investment on industry’s part. We believe it is unfair to expect the long neglected and currently beleaguered SSCF operators to have to come up with the majority of the investment required to implement this Plan. Any such scheme or fund should fall under Article 29 of the EMFF regulation, along with other relevant articles to allow full use of the “Human Capital” so that the SSCF can provide towards implementation of the action plan. We must not forget that this plan is a requirement for the Seafood Industry as a whole and for the various State agencies if they are to avail of specific EMFF funding.

The Inshore Management Scheme is a vital and important measure. Food Harvest 2020 states that “The implementation of a specific Inshore Management framework should proceed as speedily as possible”. In order to expedite this and for the inshore sector to contribute fully to the targets set out in F.H. 2020, in the absence of a dedicated implementation fund for the SSCF Plan, we feel that the Inshore Management Scheme fund needs to be greatly increased. For some of our inshore fisheries, management is coming at a very late stage, some may say that for some fisheries it is too late. In order to bring these fisheries to a sustainable level, robust management measures may be required. Such measures will undoubtedly cause economic hardship for those dependent on them. Funding must be made available to help with this hardship. The Minister stated when launching the consultation process that we need money to get through the challenges presented in the new C.F.P. The inshore sector will need money to get through the challenges presented by inshore management and the knock on from the CFP. Key to having sustainable inshore fisheries, is having a profitable fishing fleet. This fund has great potential for the inshore sector as falls under Articles 37,38,39,40 and 44, but if Article 29 was also included then the “Human Capital” of the SSCF could be fully utilized in drawing up management plans for our inshore fisheries. Article 44 covers inland fisheries. Are inland fisheries now coming under the remit of the SDP? If so it will mean less resources to address the challenges of the inshore Sea fisheries. The proposed one million a year will fall far short of what is required. Last year the V notching scheme cost in the region of €280,000, this is expected to increase considerably in 2015. It is expected that the RIFF/NIFF mechanism will cost approximately €120,000 a year to run. It is essential the scientific studies, mapping, monitoring and data collection are adequately funded under Natura 2000 Implementation for Fisheries and Aquaculture, CFP Implementation, and the MSFD Implementation for Fisheries and
Aquaculture as appropriate and that the Inshore Management Scheme targets the introduction of a management system that allows industry to participate fully and inform a practical solution. One small underwater study, such as the one carried out in Galway Bay on the effects of Pot fishing on Maerl, Seagrass and Kelp will cost in the region of €75,000. Several similar projects will be required on various fisheries if we are to manage them effectively. When added together, it doesn’t leave much for anything else. Greater information on the profile and activity of the SSCF might be a more effective use of limited resources.

Capital Investment in the inshore fleet is vital. In order to utilize our inshore resources to their maximum potential, in a sustainable manner, we need a safe, efficient and modern fleet of inshore fishing vessels. Historically the inshore fleet has been neglected when it has come to grant aid for capital investment. Previous Fleet renewal schemes resulted in little investment in the sector. The age profile of the under 12m fleet in comparison to that of the over 12m fleet will demonstrate this. While funding for new builds is prohibited under the EMFF, modernization and re-engining are considered the next best alternatives.

The proposed Energy Efficiency Scheme is a welcome and badly needed measure. Many of the engines in the vessels of the SSCF are old and inefficient. Replacing them with modern efficient engines will allow the fleet to fish more sustainably; more efficient engines will mean reduced input costs and reduced carbon emissions, allowing the SSCF to operate profitably while leaving a smaller carbon footprint. It remains to be seen how this scheme will be rolled out, but considering that as of 01/01/2015 there were 1834 under 12m fishing vessels on the Irish register, it’s possible that this scheme will be oversubscribed. This fund should be increased or at least if the scheme is oversubscribed, then some mechanism be built in to top up the scheme.

The Fleet Improvement Scheme is also a welcome measure. Because of previous lack of investment and the size of the inshore fleet, inshore boats need preferential treatment along the lines of the Energy Efficiency Scheme, or those of the previous fleet safety scheme. A scheme more tailored to the needs of inshore boats, considering that many are of wooden construction and many fish using different methods than their larger counterparts, is also required. While not utilizing EMFF funding the fleet safety scheme is hugely beneficial to the inshore sector and we want to use this opportunity to state how important it is, and how the vision of increasing the grant aid rate has been instrumental in keeping the SSCF fleet safe and competitive. The cap on grant aid for inshore boats in these schemes, is also something that needs to be looked at with a view to increasing it. The majority of the SSCF have availed of the fleet safety scheme in recent years, in order to comply with the Code of Practice for under 15 meter fishing vessels. The implementation of this COP has been credited with a reduction in fatalities in the fishing industry. (Maritime Safety Strategy 2015-2019).

The New Fishermen Scheme is another welcome measure if we are to get new blood into the industry and again preference should be given for applications for inshore boats. Considering the current economic climate and the high costs associated with starting off in the industry, it is understandable that most fishermen who have an interest purchasing their first boat opt to do so in the inshore sector. In common with the rest of the fleet the age profile of those operating in the SSCF fleet, is quite worrying. Stimulating investment in vessels by young fishers in this sector, is one way of getting them to commit in the long term to the industry.
It appears under Article 40 of the EMFF, there is scope to bring in a scheme to compensate fishermen for loss of earnings caused by depredation. The introduction of a scheme to reduce the financial impact of the seal depredation problem, on fishing communities, in the short term should be considered as there seems to be no willingness to manage seal populations, a Taboo subject in this country. In the absence of such a scheme and in the long term, the fact that in a number of inshore fisheries, seals are directly responsible for a high level of discarding needs to be looked at. Apart from discards due to seal depredation, these predominantly static gear fisheries would be virtually discard free as the gear used is highly selective, both in size and species of fish being targeted. While it appears that these discards will not have to be brought ashore under the landing obligation, and will not affect quota uptake, it’s something that if it could be reduced it would greatly benefit the SSCF fleet. Methods of utilizing the fund for the Discard Ban and fMSY, Supports to Producer Orgs for Storage of unwanted Catch and Fisheries Knowledge, Innovation and Technology Schemes, to help with this problem will have to be looked into and inshore boats need to be given preferential treatment as the problem of seal depredation affects the inshore fleet more than any other.

It appears that the fund for the storage of unwanted catch is only to be made available to recognized producer organizations. The vast majority of the SSCF are not members of recognized POs but many of them will still be affected by the landing obligation. The scope of this fund needs to be expanded to allow groups or cooperatives of SSCFs get the help they need in the storage of unwanted catch and compliance with the landing obligation. There is a huge potential for the SSCF to utilize these unwanted catches as Pot Bait and such storages facilities if operated by the SSCF would quite likely be self-sustaining.

While the proposed Decommissioning Scheme is of no direct benefit to the inshore sector, we request that it be implemented in a manner that will not have any adverse effects on the sector, such as reinvestment in new additions to SSCF fleet, by operators that received funding from the scheme. The fact that small scale targeted decommissioning schemes are not possible in the SSCF, due to insufficient data being available to demonstrate a fleet imbalance in certain inshore fisheries, is symptomatic of the issues facing these fisheries. The required data exists for certain Bi-valve fisheries, but because the vessels involved were not entered in the most recent Fleet report, decommissioning is still not possible. If these vessels are to be entered in future reports then small scale targeted decommissioning schemes in these fisheries should be considered, if there is sufficient data to demonstrate the merits of such a scheme.

Scientific data collection is a fundamental pre-requisite to sustainable fisheries and therefore is a priority. Unfortunately the majority of our inshore fisheries have insufficient data to even attempt managing them in an effective manner. While data collection within the Natura 2000 sites is of great importance the extent and significance of our fisheries is not limited to these sites and the issue of data collection should be approached from a fleet and stock perspective rather than individual Natura 2000 sites. A science industry partnership should be fostered, with data collection activities making full use of the knowledge, experience, vessels and equipment of the inshore sector. Again under Article 29 the “Human Capital” that the SSCF can provide should be taken advantage of.
The Natura 2000 Implementation For Fisheries And Aquaculture fund is of great importance to the SSCF. Utilizations of this fund will allow many important inshore fisheries to continue in a sustainable manner within SACs/SPAs. Again we would like to see this fall under Article 29 of the EMFF regulation, to allow the “Human Capital” and other resources of the SSCF fleet being taken advantage of, with the idea of fishermen being used as citizen scientists exploited where possible to allow for the greatest scientific and economic benefit to accrue to SSFC communities.

The introduction of the fund for Adverse Climatic Events is a welcome addition and will be required if we ever have a repeat of the winter 2013/2014. How effective this scheme will be, greatly depends on how it is set up, so we would greatly appreciate the opportunity have some input into this. Industry will have to contribute significantly to this fund to make it large enough to be effective. Therefor it needs to be attractive enough for industry to do so. There is potential to allow Share Fishermen as well as Vessel owners to get involved. The 2014 Pot replacement scheme, came nowhere close to covering the cost of replacing equipment lost in the 2013/2014 storms, but still cost 340000 euros. It also failed to cover loss of earnings due to that particular climatic event. Again a sizeable fund will be required to cover any such future events, and the figure of two million euros needs to be maintained as a minimum.

The Fisheries Knowledge, Innovation and Technology scheme is to provide support for the provision of advisory services that will assist fishing operators in developing feasibility studies, advice on environmental sustainability and advice on business and marketing strategies. The NIFF has been asked to take a first step toward this through identifying inshore fish that could be targeted in a marketing initiative with Bord Bia. Adding to the skillset of individual operators and groups is critical to increasing the competitiveness of the inshore sector. The relationship between inshore fishermen and scientists would, as we can now see benefit from increased open and informed communication. This ties into scientific data collection and our ability as Sentinel fishermen or “Citizen Scientists” to produce good quality data and background information to inform management and policy. Again in the absence of a dedicated fund for the implementation of the SSCF Plan we feel that the SSCF fleet needs to prioritized under this scheme.

Union Priority 5 Marketing and Processing

Marketing will be vital the development of sustainable inshore fisheries. In general inshore fisheries tend to be low volume high value fisheries. Many of the species targeted end up as premium top end, luxury seafood products. This resulted in a major crash in the quayside price of many of these species during the global downturn, some in the region of 50 percent. While demand and quayside prices for some of these species seems to be improving, they are in general still well below pre- downturn levels. These species need for once to be targeted for marketing. There is a huge potential to market sustainably caught fish, landed by the Irish small scale coastal fleet, separately from seafood produced by the rest of the industry. Inshore vessels need to see a financial benefit to attaining the BIM and European Environmental standards for their vessels. Marketing and implementing management in our inshore fisheries should go hand in hand. Any increase in the quayside price of fish will alleviate the
fishing effort required to make a fishery viable, this will have the knock on effect of boosting the stock in that fishery.

Union Priority 4 FLAGs

The 12 million euro allocation to the FLAGs is also seen as a positive, as it is hoped that this money will support many important projects in the small fishing communities around the coast. These small communities are the homes of our inshore sector. While the funding under the EFF was modest in comparison to other countries with projects ranging going from the very small to €50,000, it puts coastal communities and seafood as its central focus. It is critical to maintaining the existing jobs in challenging times. The limit of €20,000 on grant aid is an obstacle to attracting bigger investment from the entrepreneurs within the coastal communities. There are also more broad ranging capacity building issues that might be addressed under the EMFF if the limit was lifted. It is essential that the focus of the FLAGS remains centered on our fishing and coastal communities and addresses the challenges that are faced at an economic level. However there is one key change between the EFF and EMFF. The Commission have distinctly specified that there should be a SSFC action plan (Article 18i). Union Priority 4 now must address a broad range of sectoral issues while being run on a Community Led Local Development model with essentially the same resources allocated but much more to do. While there are challenges facing the industry we do want a vibrant sustainable industry not one that has been diversified out of existence or must compete at every juncture with marine tourism etc. In the absence of a dedicated fund for the implementation of the SSFC Plan, we feel FLAG funding needs to be greatly increased and made more attractive for SSFC operators. Especially given that SSFC must now compete for all the funding coming into this area and that the FLAG initiative requires a significant level of co-funding with a lot of red tape.