Submissions Received – Volume 21

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James Barry

Dear Minister Creed,

I would like to make a submission to the above-mentioned consultation.

The seas around Ireland are the common heritage of the people of this country, as well as future generations, and belong to no individual or industrial sector. Our seas are our history, our landscape and are vital to coastal communities which, through tourism or small-scale fishing, depend on it for a living. Our ocean wildlife is among the most spectacular in the world, however it is gravely threatened from poorly-regulated fishing, pollution and fossil fuel exploration. Indeed, much marine life has already deserted our coastal zone from overfishing and harmful activities – inshore fishing for herring, cod and mackerel are a thing of the past, commercial fishing for salmon, cods and sea bass have shut down completely, while 62% of species of sharks and ray face extinction. Many of these problems can be blamed on trawling – an indiscriminate method of fishing that results in enormous waste and habitat destruction.

It is very welcome that restrictions on trawling within the 6 nautical mile zone are being considered and I would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency. Such a move provides an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

I hope that this bold move will be passed but on its own it will not be enough to provide the protection needed for healthy seas. Only good management of marine resources will do that, something which should include the prohibition of other damaging fishing practices such as dredging and tangle netting, better regulation of supertrawlers, the designation of robust Marine Protected Areas, the banning of exploration of fossil fuels, and the legal protection of threatened marine species. Prohibiting trawling within the 6nm zone however would be a major step in the right direction.

Yours sincerely,

James Barry
Emmet Henry

Re: Public Consultation on Minister’s Review of trawling activity inside the 6 nautical mile zone

Dear Minister Creed,

I would like to make a submission to the above-mentioned consultation.

The seas around Ireland are the common heritage of the people of this country, as well as future generations, and belong to no individual or industrial sector. Our seas are our history, our landscape and are vital to coastal communities which, through tourism, small-scale fishing, seaweed harvesting etc. depend on it for a living. Our ocean wildlife, while among the most spectacular in the world, is gravely threatened from poorly-regulated fishing, pollution and fossil fuel exploration. Indeed, much marine life has already deserted our coastal zone due to overfishing and harmful activities – inshore fishing for herring, cod and mackerel are a thing of the past, commercial fishing for salmon, eels and sea bass have shut down completely, while 62% of species of sharks and ray face extinction. Many of these problems can be blamed on trawling – an indiscriminate method of fishing that results in enormous waste and habitat destruction.

It is extremely welcome that restrictions on trawling within the 6 nautical mile zone are being considered. I would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency. Such a move would provide an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

I hope that this bold move will be passed but on its own it will not be enough to provide the protection needed for healthy seas. Only good management of marine resources can do that. This should include also the prohibition of other damaging fishing practices such as dredging and tangle netting, better regulation of supertrawlers, the designation of robust Marine Protected Areas, the banning of exploration of fossil fuels, and the legal protection of threatened marine species. Prohibiting trawling within the 6nm zone however would be a major step in the right direction.

Yours sincerely,
Emmet Henry
Susanne and Geoff Magee

Dear Minister Creed,

We operate dolphin watching tours in the Shannon Estuary out of Carrigaholt, Co. Clare. The resident Bottlenose Dolphins that live here are probably the largest group in Europe. We have been running these boat trips in this Special Area of Conservation since 1992. Over the years, the population has appeared to be steady, until now. The Irish Whale and Dolphin Group has been photo identifying the animals here and to date have a catalogue of around 200 individuals that reside in this area. The dolphins are here because of the strong rush of tide that brings in shoals of oil rich fish like mackerel, herring, sprat and salmon.

Pelagic Trawling of any kind in an SAC is contrary to the spirit of an area of Conservation.

This past winter, there was pair trawling in the Estuary for sprat, which is not regulated by quota, and this effort managed to take tons of this keystone species. Many animals rely on the sprat for survival; the bottlenose dolphins are one. Seabirds, seals, and larger prey also depend on the sprat. This year we have noticed a marked reduction in the numbers of dolphins that we are seeing on our boat trips. We can only put this down to the food supply having been reduced during the winter by two Irish fishing trawlers, Fiona K and Ocean Venture, trawling in the middle of the SAC, hammering a relatively small stock of sprat which are important to the dolphins that are here all year round. We have never seen dolphins as scarce as this season right now.

Our boat can take up to 50 passengers and we run our trips from April through October. This activity brings thousands of visitors from all over the world and is extremely beneficial to the local economy of a marginalised coastal community. The fishermen who swept up tons of sprat last winter will have made a short sighted profit for themselves and their crew.

We first worked at inshore fishing ourselves, lobsters and crab, until we diversified from fishing into marine tourism and in 1989, with the help from a BIM grant, we were able to get our 50 passenger vessel built. The benefits of tourism to our community out weighs the greed of a few fishermen who are overfishing the small, but essential, species, the sprat. We also have an obligatory duty to safeguard the resources of our waters to protect the animals that rely on the sprat to survive.

We appeal to you, Minister Creed, to act responsibly on this very crucial issue.

It is unbelievably irresponsible to allow pelagic trawling of any kind in an SAC - especially this one, where Europe’s largest population of Bottlenose Dolphins reside. These fish are keystone species in the marine eco system. We are hugely concerned about the impact of reducing core species from the feeding grounds of this population of dolphins. We are aware that the Marine Institute did an assessment study, which recognises that sprat are an important prey species - yet the study appears to know little of their population or how many tonnes are taken in the mix when fishing for herring. We are witnessing the reality, which is a diminished population of dolphins.

Yours respectfully,

Susanne & Geoff Magee
John Quinlan

To whom it may concern,

My name is John Quinlan and I am the proprietor of a sea-angling business in South West Kerry.

I would urge the Minister to consider excluding the use of all trawls over 15m in height from vessels from inshore waters.

Shore and inshore based sea-angling in Ireland depends on a commonly owned national resource – inshore fish stocks. A reduction in inshore trawling would improve inshore stocks and therefore offer increased opportunities for recreational fishing businesses.

Our neighbour Norway benefits from well managed inshore fish stocks with annual direct expenditure by tourists of 104 million Euro (2011 study), and the USA, while obviously a much bigger country than Ireland, benefits to the tune of $82 billion in economic impact and 500,000 jobs from recreational sport angling.

While only one step in the right direction to improving inshore fish stocks, a courageous decision to remove 15m trawls would benefit both smaller inshore commercials and sea angling businesses alike.

Yours faithfully,
John Quinlan

Pádraic Fogarty

To whom it may concern,

I would like to make a submission on the Public Consultation on Trawling Activity Inside 6nm. I am very supportive of the proposition to restrict trawling within the coastal zone and very much hope that the department carries through on this public engagement – something which I believe has broad, popular support. I hope it is the start of a new attitude to the management of our marine resources as only with good management can we hope to rebuild lost fish populations and marine habitats. I hope that the Irish government can see the opportunities in becoming a global leader in marine conservation and that this will come at great benefit to coastal communities. We already have a strong legislative framework in place to establish marine protected areas and end overfishing. These should be embraced through engagement with communities, scientists and stage agencies.

I want to commend Minister Creed and the department officials for this bold initiative

Yours sincerely,

Pádraic Fogarty
Caroline Lea

Dear Minister,

Obviously it is imperative that the policy be reviewed. I propose that there should be an exclusion of all vessels using trawls over 15 m length inside 6 miles and baselines.

The impact on the local economy of these large trawlers is devastating. We need to reestablish links between local fish resources, local fleets and local economies.

I live in the Kenmare Bay area which is a designated S.A.C. Surely we are contravening a European habitat directive by allowing these vessels into a designated S.A.C. ... Kenmare Bay.

I am a local stakeholder as I am involved in the tourism business. Every year our guests are catching less and less mackerel..... Also we have no local fish restaurant or indeed fish monger.

Yours Faithfully, Caroline Lea
Sandra Carleton

Re: Public Consultation on Minister's Review of trawling activity inside the 6 nautical mile zone

Dear Minister Creed,

I would like to make a submission to the above mentioned consultation.

I am a woman fishing on a trawler based in Castletownbere, the [insert name]. I have spent most of my life fishing. I started fishing as a youngster with my father and from there I progressed to fishing on trawlers. The boat I am currently on, the [insert name], is part-owned by my husband, [insert name] and his father, [insert name], both of whom have spent their entire lives fishing.

We spend one third of our time fishing inside 6 nautical miles, where we target Brill, Turbot, Black Sole, Prawns and Whiting. We target Brill, Turbot and Black Sole when the weather is not fit for us to fish off land and we target Prawns and Whiting when we have caught our quota for other species E.G Monk, Haddock and Megrim. Our quota's are very strict as it is and the boat cannot afford to be tied up.

If we were prohibited from fishing inside 6 nautical miles, this would have a detrimental affect on the boat and crew's earning potential while also forcing us to work in weather conditions that are not suitable for us, putting the boat and crew at grave risk.

If the proposed ban should come in effect, I would hope that boat owner's and crew would be compensated for loss's incurred.

Our seas are vital to our coastal communities, which medium to small scale trawlers depend on. On the Beara peninsula, this the bread line for a lot of families.

Yours Sincerely,

Sandra Carleton.
Patsy Granville

Public Consultation on Minister's Review of Trawling Activity Inside the 6 Nautical Mile Zone

Dear Sirs

I am very concerned re the activity in Kenmare Bay Special Area Of Conservation whereby every winter large pair trawlers make repeated visits to Kenmare Bay and spend several days pulling small mesh indiscriminate nets across the width and depth of the bay.

Their target species is sprat but their catch cannot be properly verified and they have their AIS turned off and use scrambled radio.

They are destroying the marine habitat that is Kenmare Bay by removing huge quantities of all sorts of species and a vital link in the food chain.

The interests of the marine leisure and tourism sector must be considered in your decision as many livelihoods depend on this sector in our community.

Angling, Bird Watching, Whale/Dolphin/Seal watching, Boating, Sailing, Kayaking and all the other leisure activities on the Bay must be considered.

I urge you to exclude all vessels using trawls over 15m length from inside 6 miles and base lines

Sincerest Regards,
Patsy Granville
Alan Carleton

Dear Minister Creed,

I am writing to you with reference to the trawling ban inside 6 nautical miles. I part-own and skipper the 22m [Redacted] We spend approximately one third of our days fishing in this area. In bad weather, we fish there on the Lee shore as it is a lot safer hauling and shooting our nets in the shelter of the shore. By refusing us access to this area will endanger my crew. If there is only a day or so that is fit to go to sea, we shoot our nets close to shore and tow out to maximise our fishing time. Other times, we fish here to target species that we have quota for such as Whiting, Brill, Turbot, Black Sole and Prawns.

If this proposed ban is to go ahead, I would hope that I and my crew will be compensated as to any loss's that we will incur.

Yours Sincerely,

Alan Carleton.

Peter Carleton

Mr. Michael Creed TD,

I am writing to you with reference to the proposed trawling ban inside six nautical miles. I part-own a 22m fishing boat, the [Redacted] When I started my first fishing boat in 1973, we fished inside six miles most of the time. It was a safe environment close to land. I reared a family of four from the proceeds from this area.

At the moment, we spend one third of our fishing time inside six miles fishing for Whiting, Brill, Turbot, Black Sole, Prawns and Skate, which we have a quota for. Refusing access to this area will endanger the lives of the skipper and crew as we would have to travel further.

If we were to go ahead I would hope that both crew and boat owners would be compensated for loss's incurred by this drastic action.

Yours Sincerely,

Peter Carleton.
Stephen Dirrane

Public Consultation on Trawling Activity inside 6NM of the Baselines,
Sea Fisheries Policy and Management Division,
Department of Agriculture, Food and the Marine,
National Seafood Centre,
Clerdale,
Co Cork,
P83TX47
11/06/2018

Email to: fisheriesconsultation@agriculture.gov.ie

RE: Public Consultation on Trawling Activity inside 6nm of the Baselines

Dear Sir, Madam

My name is -----STEPHEN dIRRANE-----------------------------, and my address is -------------, and I make this submission in relation to the Public Consultation on Trawling Activity inside 6 Nautical Mile of the Baselines.

I cannot support any of the exclusion proposals referred to in the Consultation paper which forms the basis of this public consultation.

The consultation document in the introduction section states “in light of submissions made and an analysis of all material, the Minister, after considering the matter carefully, has decided, without prejudice, to undertake a comprehensive and formal examination and review of access to waters inside Ireland’s 6 mile zone, including inside the baselines”

The above statement cannot be true as the Minister has only undertaken a partial examination of all the issues and has focused on trawling only. This is not a comprehensive view of access as it omits gill netting, seine netting and the total fish management of the inshore potting sector. Equally the analysis by BIM and the Marine Institute is both biased and misleading to say the least.

If any of the current exclusion suggestions became policy it would in fact mean that vessels all along the coast of Ireland may in some cases have to travel forty to fifty miles from their home ports to fish. A vessel from Killybegs >15m or >18m would (if excluded from fishing inside six miles of the base lines) have to travel outside North Mayo. This scenario would be repeated all along the coast resulting in economic collapse for some vessels, and potential loss of life due to economic pressures imposed by change of policy.

This consultation only addresses trawling inside six miles of the baselines. It fails to evaluate the impacts on inshore gill netting and seine netting, both of which are critically important for
vessels of various lengths. Of particular concern are the glaring omissions in the consultation paper as to the potential future mismanagement of potting inside six miles of the baselines and its impacts on crabs, lobsters and shrimps populations. The consultation paper is devoid of any proper scientific evidence and the eco-system approach to fisheries management.

Economic Analysis by BIM

I believe the Economic report produced by BIM is deeply flawed and very biased. The report clearly states that Nephrops, Herring, Sprat and Black Sole are the most important species caught within the 6 mile zone. It values the loss to these vessels if excluded would amount to €5.81M and goes on to make the assumption that these species can be caught outside the 6 mile zone.

Vessels fish in a particular area because the fish are located there. We note “the individual dependence on Sprat has not been assessed in this report” and as “50% of its value comes from within the 6 mile zone” the question has to be asked as to why this was not considered in the report.

I also take issue with the conclusions of the assumed impact on the polycyclic sector. It divided the length class of vessels into 3 categories and uses the statistics value for the overall value of fish caught by all the vessels in a segment to demonstrate a negligible impact overall on the segment. This completely ignores the serious impact on those who depend on this sector and do not have an alternative.

Existing track record fisheries (herring)

Numerous vessels >15m and >18m are ring fenced in the Celtic Sea, North West and semid and herring fisheries. Much of these fisheries take place close to shore. Map 2, Page 13 clearly identifies where herring aggregate to spawn. These areas have been traditionally fished by vessels equipped and who are specialised in catching herring in the winter months. Will they now be excluded ???

Sprat

Page 14 of the consultation document states that “fish lost (sprat) to the over 18m vessels, if excluded, would allow an additional 60 vessels under 16m to participate in these fisheries. No evidence exists that these vessels actually exist or have the expertise and technology to catch the fish. It fails to recognise that certain vessels rely on sprat in inshore waters across various lengths. It again reflects an “agenda” from a state agency paid for by all taxpayers.

Nephrops

Many of the larger vessels fish Nephrops in Galway bay for example. Many catch 20% of their gross income in this fishery. The consultation document on page 6 makes a sweeping statement that “smaller vessels are more dependent on fish stocks closer to home ports or in shallow waters as their engine power is lower and are less capable of working in poor weather”. This is very misleading and is in fact not true. Many large vessels need to fish in
areas such as Galway and Donegal bays during bad weather periods or for seasonal reasons. Many of the larger vessels are of wooden construction and simply cannot go outside the baselines in the winter. To do so would be very dangerous.

Safety and Economic Collapse of Businesses
Safety of any fishing vessels is a matter for the master of that vessel. However, avoiding economic collapse of his or her business is also a very serious matter. By removing access to a vessel or particular cohort of vessels from traditionally fished areas simply means shifting the effort elsewhere. When one considers that the baselines run from head land to head land and as mentioned in the opening, vessels would have to leave a sheltered area in bad weather to travel to open water. This in many cases could be fifty miles making it unviable and extremely dangerous. Policy changes have major economic impacts. Persons have a right to enjoy a traditional right to fish. To exclude one citizen over another based on vessel length without outlining any reason for doing so in the consultation document is seriously flawed. What agenda are we working to here?

Lack of Scientific Evidence
The advice sought by DAFM from the Marine Institute for this consultation process is to narrow and only focuses on trawling. The scientific analysis fails to consider other fisheries and therefore gives an incomplete and much skewed picture is given as a misguided reason for this consultation... The focus is on trawling only and the analysis is limited as it omits seine and gill netting. Most of all it fails to address the total lack of fisheries management in the inshore sector itself.

I cannot support the limiting of trawling inside six miles of the baselines for the above reasons. This process is agenda driven, non transparent and the Minister himself has only examined commissioned evidence chosen for him. He has not carefully examined the matter and has been denied proper scientific and economic evidence deliberately.
Group of Fishermen from the Northeast
and 37.99 meters should be given on the grounds of safety. We hope this is the first of many steps to ensure a sustainable, fair, well balanced and environmentally friendly fishing industry in Ireland.

Signed,

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Ann Harvey

Dear Minister,

I am an employee of the Atlantic Dawn Group. Our company owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory - Arctic Fish Processing. I am availing of this opportunity to make a submission to you as part of the public consultation for the Review of Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters.

You will be aware that our work is seasonal and we rely heavily on the local fleet to supply fresh fish for our production. A number of vessels within the polyvalent segment of the fleet are regular suppliers to us. I am therefore concerned to learn that new regulations could be imposed that would prohibit these vessels from catching within the 6 Nautical Mile Zone. This will directly impact my employment and the jobs of many of our seasonal staff.

I wish to urge you strongly to maintain the status quo in this fishery so that there is no change in the fishing opportunities for vessels above 18m. I am very sure that if these vessels were refused permission to catch within the 6 nautical mile zone valuable fishing opportunities would be lost resulting in less production in the freezing factory where I work. This is particularly true for Sprat, Horse Mackerel and North West Herring.

It is important that we do not throw away valuable fishing opportunities and the jobs of individuals such as myself.

Many thanks for considering my views on this matter.

Yours faithfully

Ann Harvey
Atlantic Dawn Group

---

Eric Murphy

Dear Minister

I am a fisherman who operates along the northwest, west and southwest coast of Ireland. I have serious concerns about the proposals to restrict access for fishing inside the 6 mile zone. We catch a portion of our fish inside the 6 mile zone during the winter months when we can’t get to work offshore due to extreme weather. With this new proposal it will have serious consequences for my fishing activities, my business, my boat together with the livelihoods of my crew during the winter months. For example for some vessels fishing Celtic sea herring fishery from November till February, this is a fishery where the vast majority of herring was caught inside this zone. On a safety issue alone vessels shouldn’t be made to work outside this zone where is could be 30 miles form some of the harbour’s when weather isn’t fit to be there, and yet could be sheltered on the traditional grounds worked in winter months.

It is my understanding the common fishery policy of 2013 and 2012 make it clear that access to the inshore waters of the state must remain open to all classes of fishing enterprises without fishing discrimination and therefore submit that waters should be open to all vessels.

Eric Murphy
Conor Meehan

Dear Minister,

I am an employee of the Atlantic Dawn Group. Our company owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory - Arctic Fish Processing. I am availing of this opportunity to make a submission to you as part of the public consultation for the Review of Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters.
You will be aware that our work is seasonal and we rely heavily on the local fleet to supply fresh fish for our production.
A number of vessels within the polyvalent segment of the fleet are regular suppliers to us. I am therefore very concerned to learn that new regulations could be imposed that would prohibit these vessels from catching within the 6 Nautical Mile Zone.
I wish to urge you strongly to maintain the status quo in this fishery so that there is no change in the fishing opportunities for vessels above 18m. I am very sure that if these vessels were precluded from catching within the 6 nautical mile zone valuable fishing opportunities would be lost resulting in less production in the freezing factory where I work. The loss simply would not and cannot be compensated for by the smaller dedicated inshore vessels. This is particularly true for Sprat, Horse Mackerel and North West Herring.

It is important that we do not throw away valuable fishing opportunities.

Many thanks for considering my views on this matter.

Yours Faithfully

Conor Meehan

Philip Kelly

Dear Minister,

I am an employee of the Atlantic Dawn Group which owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory - Arctic Fish Processing.

Our work is seasonal and we rely heavily on the local fleet to supply fresh fish for our production. A number of these vessels would be prohibited from catching within the 6 Nautical Mile Zone if new regulations are imposed. I am very concerned that if these vessels were precluded from catching within this zone then valuable fishing opportunities would be lost resulting in less production in the freezing factory where I work. The loss would not and cannot be compensated for by the smaller dedicated inshore vessels. This is particularly true for Sprat, Horse Mackerel and North West Herring.

I urge you to maintain the status quo in this fishery.

Thank you for considering my views on this matter.

Yours faithfully

Philip Kelly
John Histon

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit for vessels over 18 metres.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limits for vessels over 18 metres.

I have been fishing on under 24 metre boats since I started fishing over the last thirty years. A lot of our fishing is inside and outside the 6NM area especially for Horse Mackerel and Mackerel, but 90% of our Herrng fishing is inside the 6NM limit. In fact, it is right up to the shore in some coves and bays and the same for Sprat fishing in shoal water.

As for Horse Mackerel it changes year to year. Some years, two miles off shore, other years further off, depends on their migration path and six nautical miles on land is not far. However, 6NM out to sea in an under 24 metre boat is a long way off in gales as for crew safety and fishing in a safe manner.

For that reason we work away most of the time close to the shore as in, inside the 6nm to make our living. If this is passed it will make our fishery a hard task when the pattern of the stocks (migration path) stay inside the 6 NM, you will be taking away our livelihoods.

As in other European waters their vessels from smallest to biggest can fish right up to the shore may it be a ten foot punt up to a eighty metre vessel.

The sea is like land, if it is not worked in these areas it never comes back to as it was in my past experience of fishing.

It would make more sense to concentrate on BREXIT instead of this nonsense as it is not making any sense to me.

Thank you for your consideration on this matter.

Yours sincerely

John Histon
Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit. I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

I have been fishing for over 20 years inside and outside of the 6nm limit, mostly pelagic fishing. Down through the years we caught Herring, Horse mackerel, Sprats and Mackerel, mostly inside the 6nm limit. In 2015 our company build new boats, costing them millions and they were build for the purpose of also being able to fish within the 6nm limit.

Herring were always caught along the coast and if we weren’t allowed inside the 6nm limit it would have a huge impact on my livelihood and also my family. In adverse weather conditions in which we still have to go to sea, we would fish along the coast within the 6nm limit.

If we couldn’t fish inside the 6nm in adverse weather conditions, we would have to tie the boat up which would mean no income for the owner and us the crew, therefore we wouldn’t be able to provide for our family and that is a future that I am not looking forward to. So PLEASE leave things as they are. Thank you for your attention and consideration on this matter.

Yours sincerely,

Paul Dirrane
Páraic O’Cualain

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trailing activity inside the 6nm limit. My name is Páraic O’Cualain, from [Redacted] and I am currently working on the [Redacted] and I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

I have been fishing on the boat for 42 years, since I was 18 years old. The boat was upgraded in 2018 to fish within the 6nm limit.

The hearing quota is extremely important to our boat and the future of my job. 6nm Limit would not permit this and would not be possible to fish herring.

The 6nm limit is used for crew safety purposes, to shelter from land in adverse weather conditions while at sea.

Thank you for your attention and consideration on this matter.

Yours Sincerely

Páraic O’Cualain
Marty Flaherty

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit. I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6NM limit for vessels over 18 metres.

I fish on the Westward Isle fishing vessel which is 27 metres long and is one of three sister ships that were built especially for pelagic fishing targeting herring, scad, mackerel, boarfish, and tuna.

I fished on the first Westward Isle that was built in 1982. I am 36 years fishing on these boats and most of these years were spent fishing inside the 6NM limit for herring, scad and mackerel.

At the moment, the mackerel migration tends to stay out outside the 6NM zone. However, if like the late 1980's they change course and migrate down the west coast inside the 6NM zone. This spells a disaster for the pelagic tank boats and their owners, the crew and all their families along with the factories. What happens to all of the markets? I don’t think the under 18 metres will fill that void.

Meanwhile who pays the mortgages and the bills at home and elsewhere.

And as for herring and scad, we have spent most of these years fishing them inside the 6NM limit.

Yours Sincerely

Marty Flaherty
Dear Minister,

Thank you for the opportunity to help decide the future of the Irish fishing industry. I have been employed as a fisherman on an under 24 metre vessel for a considerable number of years. I wish to make the submission that the current proposal to remove the under 24 metre vessels from inside the 6 mile limit is of grave concern to me personally. The negative effects of which I will outline hereafter.

1. Forcing the small vessels to compete with larger super trawlers will lead to situations in which the vessel and its crew will be pushed beyond its capabilities.

2. Our ability to fish outside of 12 miles is wholly and totally dependent on weather. This will further stress the already tight timeline under which we must access these stocks during their migration pattern.

3. I have fished inside the 12 mile of the Irish coast most of my fishing career. It is here that I and generations of Irish fishermen have learned their trade and have taken this experience all over the world. Now with one stroke of a pen all that heritage and those traditions will be wiped out. Generations of experience gone.

4. We need only look to your nearest neighbour Scotland for the example that vessels small and big may use their waters as they like, fishing where they are safe, in conditions that minimise risk and maximum crew and vessels safety.

5. Fishing, widely noted as the most dangerous job in the world is heavily regulated and policed here in Ireland. Something I wholeheartedly agree with. Yet the decision that pushes small vessels further into the wilds of the north Atlantic is a massive step backwards for the health and safety of Irish fishermen.

6. The need for protecting Irish fisheries from large trawlers is very real. I am glad your office has recognised this. However, this does not begin with the under 24 metre vessels but rather the larger foreign super trawlers which fish year round of the Irish coast comparatively unregulated.

Yours Sincerely

Dessie O'Donnell
Niall Boland

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit. I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

I have been fishing aboard the Westward Isle since 1997 and the vessel was upgraded three years ago to make her much more efficient and safer to work aboard. The vessel was also built 15 metres shorter, keeping in line with fishing regulations to be able to fish inside the 12 and 6 mile limits where most of our herring fishing was done over the years.

All of our mackerel, herring and horse mackerel was done inside the 12 and 6 mile limits when regulations allowed and although the herring quota is small now, with proper management it should increase in the future but will be of no good to us if we are not allowed to fish in the areas inside the 6 mile limit where we used to catch all our herring.

Also with our relatively small size of vessels it is possible to reach these areas in bad weather, catch our fish and get back into the shelter of Killybegs harbour thus not having to go further afield in adverse weather conditions.

Thank you for your attention and consideration on this matter.

Yours Sincerely

Niall Boland
Dear Minister

I am an employee of the Atlantic Dawn
We have a few polyvalent vessels that catch much of their quota locally here in Donegal.
And we also have the freezing factory - Arctic Fish Processing.
I am writing to you regard the matter of the Review Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters.
We are already working seasonal and we rely heavily on the local fleet to supply fresh fish to keep us working for as long as possible during the season.
There are a lot of other vessels locally that are regular suppliers to us. I am therefore very worried and concerned to learn that new regulations that would stop these vessels from catching within the 6 Nautical Mile Zone. This could have a detrimental effect of our Factory.
It is not easy to have a steady income in the fishing industry at the moment and it is especially stressful when I have a Mortgage to pay every month.
And these changes are very worrying indeed, and would mean a further reduction in income and the cost of living is still rising!!
Please consider leaving theses regulation as they are so that there is no change in the fishing opportunities for vessels above 18m.
I am very sure that if these vessels were excluded from catching within the 6 nautical mile zone.
There would be a lot less production in the freezing factory where I work.
Which the vessel less than 18Mts cannot fill.
This is particularly true for Sprat, Horse Mackerel and North West Herring.
Thanks for your time.

Kind Regards
Eamonn Doherty
Dear Minister Creed,

I would like to make a submission to the above-mentioned consultation.

The seas around Ireland are the common heritage of the people of this country, as well as future generations, and belong to no individual or industrial sector. Our seas are our history, our landscape and are vital to coastal communities which, thorough tourism or small-scale fishing, depend on it for a living. Our ocean wildlife is among the most spectacular in the world however it is gravely threatened from poorly-regulated fishing, pollution and fossil fuel exploration. Indeed, much marine life has already deserted our coastal zone from overfishing and harmful activities – inshore fishing for herring, cod and mackerel are a thing of the past, commercial fishing for salmon, eels and sea bass have shut down completely, while 62% of species of sharks and ray face extinction. Many of these problems can be blamed on trawling – an indiscriminate method of fishing that results in enormous waste and habitat destruction.

It is very welcome that restrictions on trawling within the 6 nautical mile zone are being considered and I would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency. Such a move provides an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

I hope that this bold move will be passed but on its own it will not be enough to provide the protection needed for healthy seas. Only good management of marine resources will do that, something which should include the prohibition of other damaging fishing practices such as dredging and tangle netting, better regulation of supertrawlers, the designation of robust Marine Protected Areas, the banning of exploration of fossil fuels, and the legal protection of threatened marine species. Prohibiting trawling within the 6nm zone however would be a major step in the right direction.

Yours sincerely,

Regards,

Cathy
Sean Griffin

Nephrops

Many of the larger vessels fish Nephrops in Galway bay for example. Many catch 20% of their gross income in this fishery. The consultation document on page 6 makes a sweeping statement that "smaller vessels are more dependent on fish stocks closer to home ports or in shallow waters as their engine power is lower and are less capable of working in poor weather." This is very misleading and is in fact not true. Many large vessels need to fish in areas such as Galway and Donegal bays during bad weather periods or for seasonal reasons. Many of the larger vessels are of wooden construction and simply cannot go outside the baselines in the winter. To do so would be very dangerous. The other significant factor is that the base line is starting at the back of the Aran Islands, to extend this 6 miles out would prohibit vessels fishing on half of the Aran grounds. I would estimate that 20% of the revenue of the co-op is derived from these grounds and that this is up to 80/90% for vessels that do not fish on the porcupine bank.

If there is a need to close areas or fisheries for conservation it should be done on an Ad Hoc basis and not by a one size fits all solution.

Sean Griffin

Manager

Galway and Aran Co-op
Re: Public Consultation on Minister’s Review of trawling activity inside the 6 nautical mile zone

Dear Minister Creed,

I would like to make a submission on the above consultation, in support of the exclusion of all vessels over 15m in length, using trawls inside the 6 nm limit and baselines in Irish coastal waters.

While this solution may still not offer protection to many declining stocks it will offer some protection from the poor practices of recent years. It will however come too late to save the mullet stock in Cork harbour which were a valuable Recreational Sea Angling (RSA) species but are now largely consigned to fish meal after being scooped up in huge numbers by a pair of +18m trawlers. Mullet stocks in the harbour show little or no sign of recovery.

The exclusion of +15m vessels will no doubt help but it must not be considered as a solution to the problems of over fishing and unreported, unregulated and illegal fishing. The department need to address these issues urgently to address the fact that “everything now has a value”. We are seeing the netting of mullet, the trawling of sprats and the collection of green shore crabs being carried out on an industrial scale with no quotas or reporting of catch. The Precautionary Principle would suggest that we regulate and then study the effect of such fishing practices on previously “little or no value” species but are species crucial to a healthy marine ecosystem.

Thank you,

Jim C

Jim Clohessy

Eric Murphy

Dear Minister

I am vessel owner that works inside the 6 mile zone, they rely on this area to fish in winter months were we can only get to sea for a short weather window. we work northwest west and south coasts .. for example Donegal bay will be closed off for us .. outside the Aran islands will be closed off plus other parts of the south coast too, we traditionally work these grounds at different parts of the year ..

This proposal will have serious consequences for our future in fishing along with our crews livelihoods if this proposal is too happen.

We are to understand that on the common fishery policy 2013v to 2022 make it clear that access to the inshore waters to remain open to all classes of fishing enterprises without fishing discrimination and therefore submit that the waters should be open to all Irish vessels.

Eric Murphy
Ciarán Parnell

Dear Minister Creed,

I would like to make a brief submission to the above-mentioned consultation.

Our coastal seas should be teeming with life, and should be a refuge for all species, and protected from indiscriminate trawling.

Trawling can be a hugely wasteful method of fishing, as a large proportion of ‘undesireable’ fish are caught and discarded with each trawl, and this has a disastrous effect on the delicate balance in the marine ecosystem.

Our sea life is already seriously threatened from decades of overfishing and pollution, and a ban on trawling with a six nautical mile coastal zone would be a very positive move. A further prohibition on mid water and bottom trawling would be hugely beneficial.

It would help small scale fishing, and tourism industries, and enable the recovery of species and habitat that have been destroyed.

I also feel strongly about massive ‘Supertrawlers’ fishing on the shelf surrounding Ireland, and regulation or prohibition of these would also be a very positive move.

Yours sincerely,

Ciarán Parnell.
Christopher Browne

Dear Minister Creed,

I would like to make a submission to the above-mentioned consultation.

The seas around Ireland are the common heritage of the people of this country, as well as future generations, and belong to no individual or industrial sector. Our seas are our history, our landscape and are vital to coastal communities which, thorough tourism or small-scale fishing, depend on it for a living. Our ocean wildlife is among the most spectacular in the world however it is gravely threatened from poorly-regulated fishing, pollution and fossil fuel exploration. Indeed, much marine life has already deserted our coastal zone from overfishing and harmful activities – inshore fishing for herring, cod and mackerel are a thing of the past, commercial fishing for salmon, eels and sea bass have shut down completely, while 62% of species of sharks and ray face extinction. Many of these problems can be blamed on trawling – an indiscriminate method of fishing that results in enormous waste and habitat destruction.

It is very welcome that restrictions on trawling within the 6 nautical mile zone are being considered and I would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency. Such a move provides an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

I hope that this bold move will be passed but on its own, it will not be enough to provide the protection needed for healthy seas. Only good management of marine resources will do that, something which should include the prohibition of other damaging fishing practices such as dredging and tangle netting, better regulation of supertrawlers, the designation of robust Marine Protected Areas, the banning of exploration of fossil fuels, and the legal protection of threatened marine species. Prohibiting trawling within the 6nm zone, however, would be a major step in the right direction.

Yours sincerely,

Christopher Browne
Peter Power

Dear Minister Creed,

I would like to make a submission to the above-mentioned consultation.

The seas around Ireland are the common heritage of the people of this country, as well as future generations, and belong to no individual or industrial sector. Our seas are our history, our landscape and are vital to coastal communities which, through tourism or small-scale fishing, depend on it for a living. Our ocean wildlife is among the most spectacular in the world, however it is gravely threatened from poorly-regulated fishing, pollution and fossil fuel exploration. Indeed, much marine life has already deserted our coastal zone from overfishing and harmful activities — inshore fishing for herring, cod and mackerel are a thing of the past, commercial fishing for salmon, eels and sea bass have shut down completely, while 62% of species of sharks and ray face extinction. Many of these problems can be blamed on trawling — an indiscriminate method of fishing that results in enormous waste and habitat destruction.

It is very welcome that restrictions on trawling within the 6 nautical mile zone are being considered and I would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency. Such a move provides an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

I hope that this bold move will be passed but on its own it will not be enough to provide the protection needed for healthy seas. Only good management of marine resources will do that, something which should include the prohibition of other damaging fishing practices such as dredging and tangle netting, better regulation of supertrawlers, the designation of robust Marine Protected Areas, the banning of exploration of fossil fuels, and the legal protection of threatened marine species. Prohibiting trawling within the 6nm zone however would be a major step in the right direction.

Yours sincerely,

Patrick Mc Loone

Hi

I am the owner of [redacted] Trawlers from under the 6 mile limit. I fish from the small port of Rosbeg which about a 100 years ago was one of the top herring ports in the county. I often seen in my young days dozens of large Trawlers come in and trawl round the bay taking what they could and scattering the herring.

This practice is still going on but is done only by a small no of Trawlers now. I was given a small herring quota for this last two years but what’s the point, before I got fishing last year the herring was closed because a large trawler kept fishing and caught way above his quota.

He obviously caught my quote of herring but was he fined ????. I’m still waiting on my payment from him......

So yes please. Keep the over 15 MTR outside the 6 mile limit.

Are they allowed to switch off their AIS when fishing?

Regards,

Patrick Mc Loone. [redacted]
Donna Hyland

Dear Minister,

I am an employee of the Atlantic Dawn Group. Our company owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory - Arctic Fish Processing. I am availing of this opportunity to make a submission to you as part of the public consultation for the Review of Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters.

You will be aware that our work is seasonal and we rely heavily on the local fleet to supply fresh fish for our production. A number of vessels within the polyvalent segment of the fleet are regular suppliers to us. I am therefore very concerned to learn that new regulations could be imposed that would prohibit these vessels from catching within the 6 Nautical Mile Zone.

I wish to urge you strongly to maintain the status quo in this fishery so that there is no change in the fishing opportunities for vessels above 18m. I am very sure that if these vessels were precluded from catching within the 6 nautical mile zone valuable fishing opportunities would be lost resulting in less production in the freezing factory where I work. The loss simply would not and cannot be compensated for by the smaller dedicated inshore vessels.

This is particularly true for Sprat, Horse Mackerel and North West Herring.

It is important that we do not throw away valuable fishing opportunities.

Many thanks for considering my views on this matter.

Yours faithfully

Donna Hyland
Stephen Mc Sharry

Dear Minister,

I am writing to you to voice my concern regarding the review of Trawling Activity inside the 6 mile limit.

I strongly object to the advice generated by the BIM report suggesting restrictions on fishing inside the 6 mile limit for vessels over 18 metres.

It’s important to fish inside the 6nm to catch the herring Quota as weather conditions do not permit small boats to fish far off the coast in bad weather which is 90% of the time.

Will the Minister and BIM and what ever other parties that are pushing this crazy idea take full responsibility in the event of tragedies that may happen due to this crazy idea.

I thought our Government was to protect the citizens of our land, but it looks like they want to push them out to find a watery grave.

Yours sincerely

Stephen Mc Sharry
Noel McDowell

Dear Minister,

I am strongly opposed to the restriction of 18 meters trawlers not fishing within the 6nm limit.

I am a fisherman for over 40 years, still ongoing and have a practical and working knowledge of the northwest fisheries through direct experience.

On the Northwest coast of Ireland we have very few vessels that can fish within the 6nm limit over 18 metres.
The vessels that do fish within these grounds for herring, horse mackerel and mackerel, do not fish on the marine seabed.
It is pelagic based fishing which is mid water fishing and so, does not interfere with the ecosystem.

In my own past experience, when fishing is completely restricted in an area, the fishing ground becomes stagnant and unproductive.

I have faith that you will see reason to keep the system as it currently is.

Yours sincerely

Noel McDowell
Conal Breslin

Dear Minister,

As a fisherman with over forty years experience at sea.

I am strongly against the restriction of vessels over 18 metres being excluded from the fishing grounds within the 6nm limit.

In my many years of practical, hands on and direct experience of fishing, I know that if you restrict fishing activity then the seabed will become inactive and it will affect the ecosystem of that area in a negative way.

It is similar to if a farmer tills and prepares their soil and does not use this land beyond this. A jungle will grow and nothing else will be able to grow on that land.

The same can be said for the 6nm mile limit and the seabed. In order to maintain the current marine life activity in this area it needs to be used as fishing ground as it has been traditional used in order to maintain the current ecosystem in place.

I trust you will consider this and maintain the status quo based on first hand experience of fishermen at sea.

Yours sincerely,

Conal Breslin
Gary Baskin

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit for vessels over 18 metres.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limits for vessels over 18 metres.

I feel these restrictions will have a detrimental effect on the crews of these vessels, limiting their ability to catch fish. This in turn will have a follow on effect, to crews and community.

Thank you for your attention and consideration on the matter.

Yours sincerely,

Gary Baskin
Pauric Howley

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6 nm limit for vessels over 18m.

I have been fishing on the [Redacted] for over 20 years.

Herring quotas was always a vital fishery for our vessel. Herring quota provided a reasonable source of income even though we had a very small allocation of herring to catch. To change the law on the 6 nm limit would be detrimental to our herring fishery in the future.

Our vessel would also regularly use the area inside the 6nm for shelter in adverse weather conditions and believe it is our right to prioritize the safety and wellbeing of the 11 crew onboard.

I believe this is yet another attack on our vessels and it is apparent that our life as fishermen is being made all the more difficult with purposing the restrictions above. I sincerely hope the outcome of this review is for the law on the 6nm limit to remain the same and we can continue to provide a living for our families at home is a safe and responsible manner.

Yours sincerely

Pauric Howley
Noel Howley

Dear Minister,

I am writing to you regarding the public consultation regarding the review of trawling activity inside the 6nm limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 meters.

I believe vessels such as the [redacted] should be entitled to fish within 6nm as these vessels at only 27 meters as still relatively small and are restricted to fishing further offshore during the winter months due to their size and weather conditions during the normal fishing season.

If these vessels were restricted to fishing inside the 6nm limit it would seriously impact on the crews of these vessels and the many people ashore both directly and indirectly involved in the fish processing and service industry.

Thank you for your cooperation and consideration on this matter.

Your sincerely

Noel Howley
John Waters

Dear Minister,

I am writing to you regarding the public consultation on the review of trawling activity inside the 6nm limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6 nm limit for vessels over 18 metres.

I have been fishing now for over 30 years and over this time we fished on most coasts of Ireland well inside the 6 n mile limit, up to a half mile off the shore at times. We fish for mackerel and skad and over the years the skad are often found inside the 6 n mile limit and we have caught a large percentage of our skad quota inside this proposed limit.

Our boats have been upgraded and built to come in under the 24 metre size to enable us to fish inside this limit and as we fish most of our skad in the winter months it is putting us in increased danger not to be allowed to continue to do this.

Additionally if in the future the west and north west coast herring Fishery is re opened the herring grounds are inside the proposed 6 n mile zone.

I would strongly ask you to consider this matter carefully and not put our lives and livelihood at increased risk.

Thank you for your attention and consideration on this matter.

Yours sincerely

John Waters
Michael Waters

I am writing to you in relation to the public consultation regarding the review of trawling activity inside the 6nm limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6 nm limit for vessels over 18 metres. I have been fishing with the [boats name redacted] for eighteen years. In 2015 the company invested a lot of money in new boats which has resulted in the highest standard of working conditions and safety. It was built to the requirements in order to facilitate fishing within the 6nm limit.

The herring quota represented a large portion of our overall quota and contributed in a significant way to our livelihood. If the quota is returned it will be almost impossible to fill the quota if the six nm limit is imposed. On this basis I am asking you to reconsider the advice generated by the BIM report.

Thank you for your attention and consideration on this matter.

Yours sincerely,

Michael Waters
Margaret O’Donnell

I am writing to you in relation to the public consultation regarding the review of trawling activity inside the 6nm limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres. I have been working in office administration for Carmarose Trawling Co. Ltd., for the past 24 years. In 2015, a new vessel was built to meet the requirements in order to facilitate fishing within the 6nm limit.

A large percentage of the herring quota over the years has been caught within the 6nm limit. If the quota is returned, it will be almost impossible to fill the quota if the six nm limit is imposed. On this basis I am asking you to reconsider the advice generated by the BIM report.

Thank you for your attention and consideration on this matter.

Yours sincerely,

Margaret O’Donnell
Michael Joyce

Dear Minister,

I am writing to you in regard to the public consultation, regarding the review of trawling activity inside the 6 nautical mile limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

- I have between 45-50 years of fishing experience, so the restrictions have been numerous over the years.

- It is important that our boat be allowed to fish within the 6nm limit to fish herring, which are found within the 6nm limit. The fish, which we also fish, is also found within the 6nm limit.

- The 6nm limit is used for crew safety purposes, for shelter from land in adverse weather conditions while at sea.

- 27 metre boats should be allowed to fish within the 6nm limit, as we always have done over the years.

Thank you for your attention and consideration on this matter.

Yours sincerely,

Michael Joyce
Denis O’Leary
Dear Minister,

I find myself writing to you on my future and serious with regard to the BIM proposals of the 6 mile limit.

I have fished for over 30 years on various vessels from shellfish-demersal-pelagic. I fished with this company for 15 years. The company has invested heavy in new vessels for crew’s safety and fishing efficiency and with that I have invested in fishing and a house loan from my salary I have from the company.

We first fished for mackerel, herring, scad and blue whiting. The migration pattern for this fish stock can change every year so does the quota set down by the EU. Our herring fish has been closed for the last few years. My experience we fish 80% of our herring inside the 6 mile limit and for scad also. I fish on a 23.99 metre vessel which is very small when it comes to the sea. One mile is a long time at sea when the weather is bad. I find it ironic, why bring in the 6 mile limit, to benefit who?

Our counterparts in the EUU can fish to the shore from 1 metre to the largest vessel. Minister I thought you would be more worried about BREXIT, which is laying over the industry like a black cloud.

This advice is from people who sit behind desks who come up with these proposals and they don’t have to be out at sea. Their wages are guaranteed every week. However, in my job whatever is in the cod end depends on what I get paid. Our job depends on weather conditions and for many years we may only get a few days a month to access these bays. It is important for the under 24 metre vessels and I stress the safety to crew and vessels fishing these waters.

We see the closing of the salmon fishery which was blamed on the fishing industry for depletion of the salmon stock. This was not true as the stocks have not notably improved since the closure. This industry has been regulated to very high standards over the last few years, costing fishing vessels a lot of extra money. I wonder if the same regulations were put on farmers which has more deaths per years than the fishing industry, what would happen? Also, worth noting is all of the hazardous chemicals they spray on the land to kill weeds and bays which is all going into the rivers and then polluting our bays – is this regulated?

I hope you will have common sense and leave the 6 mile limit the way it is. There are a lot of people’s livelihoods depending on this, particularly in the remote areas of the country.

Yours sincerely,

Denis O’Leary
Derek Heena

Dear Minister,

I am writing to you regarding the public consultation, regarding the review of trawling activity inside the 6 nautical mile limit.

I strongly object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

I am currently fishing on the [insert vessel name] out of Killybegs since October 2017 and fished out of Castletownbere the 3 years previously.

As a young married man with family and currently starting to build a new house in [insert location], I would stress how important it is to this part of [insert location] the fishing industry is. Both my own family and my wife’s family have made their livelihood from fishing and any restrictions on this will have a knock on affect on a lot of people in this small area.

Looking forward to the future of the fishing industry with the possibility of fishing herring again the experienced fisherman will talk about the fishing of herring inside the 6nm. For years they fished herring just a couple of miles offshore and this restriction will have a massive impact on the herring fishery. It is so important to keep jobs in this area with fish processing factories, engineering companies, net mending facilities and many more depending on the fishing industry.

It is also very important to note the safety of crew during bad weather and stormy seas that we will all need access inside the 6nm for shelter from the land.

Thank you for your attention and consideration on this matter.

Yours sincerely,

Derek Heena
Tony Gillen

Dear Minister,

I am writing to you in regard to the public consultation, regarding the review of trawling activity inside the 6 nautical mile limit.

I must say I strongly disagree and object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

I have fished aboard the Colmcille for the past 14 years, we have often fished inside the 6nm limit in search of herring and horse mackerel and although the herring quota has been reduced in the last couple of years there has been a sign of stocks improving. As other quotas get smaller it is very important to us to keep our “Traditional” rights to fishing grounds open to our vessels which for years we depended on and would hope to continue to.

It is only a few years ago that our employer invested heavily in new vessels which were built to the criteria so as they could fish inside the 6nm limit it seems very unfair now that the “goal “post” is being moved so to speak.

I cannot stress enough how important the access to these fishing grounds are to both the vessels and crew in terms of safety and livelihood.

I would like to thank you for your attention and consideration on this matter.

Yours sincerely,
Tony Gillen
Dear Minister,

I am writing to you regarding the public consultation, regarding the review of trawling activity inside the 6 nautical mile limit.

I must say I strongly disagree and object to the advice generated by the BIM report suggesting restrictions of fishing inside the 6nm limit for vessels over 18 metres.

- I have been fishing for 32 years – 18 years aboard the [redacted]. The boat has invested on gear and equipment for fishing the waters inside the 6nm limit for 2018 and beyond.

- In years past herring was a vital part of our seasons. I would like to think in the near future this would also be the case. A ban would seriously effect this as much of our herring is caught inside the 6nm limit where the fish gather.

- At various times throughout the year we have to fish close to shore when weather would not permit fishing in more open waters, it is of utmost importance for crew safety in these conditions.

- To consider banning over 18 metres vessels for no apparent or scientific reasons is ridiculous and I would be very disappointed if this was the case.

Thank you for your attention and consideration on this matter.

Yours sincerely,

Tony Gillen
Dear Minister,

I would like to take this opportunity to thank you for opening this very important issue for public consultation in advance of confirming a decision on the matter of trawling activity within the 6 nautical mile zone.

However, I am vehemently opposed to any restrictions advised by The Marine Institute and BIM analysis. I work directly with the MFV Westward Isle, MFV Colmcolle and MFV Carmarose which fall into the category of over 18 metre vessels. This proposal is unjust and seeking to ban trawling activity is not the approach for solving all the economic, gear-security, ecological and conservation problems in the coastal zone.

I interact with fishermen on a daily basis that have in depth knowledge of fishing grounds within the 6 nautical mile zone. It is based on their practical, experiential review of this area that I advise that there is not any ecological advantage to restricting trawling activity in this zone. In fact, it may have a conversely negative effect on the fishing grounds and potentially have the opposite desired effect, whereby the fishing grounds may become barren, thus restricting regeneration of fish stocks. There is a clear disparity between the knowledge of the fishermen at sea and the limited scientific evidence presented for the purpose of this consultation.

I assert that the recommendation generated by The Marine Institute and BIM is unreliable due to its ill consideration for all fishing activities within the 6 nautical mile zone, instead concentrating on trawling alone. This generalised and simplistic approach to ban all trawling above a certain size vessel within the 6 nautical mile zone runs counter to the local, area specific designation of conservation areas. It also ignores a more detailed, finely tuned analysis and evidence based information that is available for a more accurate and complete picture of activity within this zone.
The theory that fish resources not designated for trawling is a black and white and narrow approach to what is a complex ecological system within this 6 nautical mile zone. This theory based perspective that is not supported by evidence may lead to a substantial overall economic loss. The suggestion that this will be replaced by the same supply for smaller vessels is not viable. However, vessels under and over 18 metres such as fishing seasonal squid and herring with static gear can certainly co-exist and is imperative that they do.

The 6 nautical mile limit is based on a headland that stretches from headland to headland, an inappropriate measurement to use for the development of inshore fisheries as this excludes trawling activity above a certain size from bays and inshore areas, which has been practiced for many years. To reiterate the gravity of this proposal, this would result in potential economic ruin for our vessels.

I would urge you Minister Creed, in light of the issues that will arise if you disregard the current proposal. In place of this, proceed towards developing locally differentiated inshore fisheries and ecological conservation plan. This could be concreted by strong and definitive guidelines with an effective local magnitude. This may be a more multifaceted and challenging approach. However, it is a more comprehensive passage to include and allow for the complexity of variables involved within the fisheries.

Your attention and consideration on this matter is appreciated.

Yours sincerely,

Claire Tully

[Signature]
Lisa Kennedy

Dear Minister,

I am an employee of the Atlantic Dawn Group. Our company owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory - Arctic Fish Processing. I am availing of this opportunity to make a submission to you as part of the public consultation for the Review of Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters.

You will be aware that our work is seasonal and we rely heavily on the local fleet to supply fresh fish for our production. A number of vessels within the polyvalent segment of the fleet are regular suppliers to us. I am therefore very concerned to learn that new regulations could be imposed that would prohibit these vessels from catching within the 6 Nautical Mile Zone.

I wish to urge you strongly to maintain the status quo in this fishery so that there is no change in the fishing opportunities for vessels above 18m. I am very sure that if these vessels were precluded from catching within the 6 nautical mile zone valuable fishing opportunities would be lost resulting in less production in the freezing factory where I work.

The loss simply would not and cannot be compensated for by the smaller dedicated inshore vessels. This is particularly true for Sprat, Horse Mackerel and North West Herring. It is important that we do not throw away valuable fishing opportunities.

Many thanks for considering my views on this matter.

Yours faithfully

Lisa Kennedy
Brenda McElhinney

Dear Minister,

I am an employee of the Atlantic Dawn Group. Our company owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory - Arctic Fish Processing. I am availing of this opportunity to make a submission to you as part of the public consultation for the Review of Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters.

You will be aware that our work is seasonal and we rely heavily on the local fleet to supply fresh fish for our production.

A number of vessels within the polyvalent segment of the fleet are regular suppliers to us. I am therefore very concerned to learn that new regulations could be imposed that would prohibit these vessels from catching within the 6 Nautical Mile Zone.

I wish to urge you strongly to maintain the status quo in this fishery so that there is no change in the fishing opportunities for vessels above 15m.

I am very sure that if these vessels were precluded from catching within the 6 nautical mile zone valuable fishing opportunities would be lost resulting in less production in the freezing factory where I work.

The loss simply would not and cannot be compensated for by the smaller dedicated inshore vessels. This is particularly true for Sprat, Horse Mackerel and North West Herring.

It is important that we do not throw away valuable fishing opportunities.

Many thanks for considering my views on this matter.

Yours faithfully,

Brenda

Brenda McElhinney
Eugene Ross

Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Respondent’s Name: Eugene Ross, MSc, PhD

Boat Name: & Reg No.

Other Fishing Vessels owned: Abdul Badoost

Skipper: tick or Crew: Other: tick

Address:

Phone no.: Email:

The consultation paper sets down the following possible options:

1. No change to status quo

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines

Other possible options identified or comments:

Comments:

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The basis for my choice is the work presented by DAFM, BIM and MI.

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Landings within the 6nm zone for vessels over 10m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 10m is €12m while the value outside is €229m.

The share of volume and value of landings for vessels over 10m from inside the 6nm zone is small, representing only 6% of the total volume and 5% of the total value.

Value of landings caught within 6nm: When under 10m vessels are excluded from the data, vessels 10-12m in length (153 vessels) land 14% of the remaining volume and 20% of the total remaining value inside 6nm. By comparison, the 12-18m sector (185 vessels) lands 20% of the remaining volume and 32% of the remaining value, while the class over 18m (163 vessels) land 60% and 48% of the total remaining volume and value respectively. As is outlined below, the 10-12m class are 100% dependent on the 6nm zone for all their landings. The 12-18m class is 52% dependent on this zone while the over 18m class is only 2.6% (3% when rounded up) dependent on this zone.

According to MI if the value of the catch foregone by the over 18m sector inside the 6nm was taken up directly by vessels under 18m, it would represent an increase of €5.5m cho vessels under 18m (for pelagic and demersal gears). This amounts to a reduction of 2.6% in value to vessels over 18m. As the value of the current landings by vessels under 18m is €89.6m, adding an additional €5.5m represents a gain of 62% for vessels under 18m. In practice, however, a number of factors would influence this, such as a difference between fishing activity for pelagic and demersal species for smaller vessels, whether the species is controlled by quota or not, and the capacity of the over 18m to catch landings of the same value, especially of quota species, outside 6nm. The significance of this potential gain to the inshore sector whose dependency is greater within the 6nm zone cannot be understated. The future viability of the inshore sector is at risk if it is not realised.

Pelagic Fish

Just over half of the estimated reduction of €5.5m to the over 18m vessels, if excluded from waters inside 6nm, and representing 2.6% of their value of landings, relates to pelagic trawling.

Demersal Fish

Vessels over 18m in length land an estimated €2.58m worth of demersal fish from inside 6nm. These are mostly quota species and this represents 2.6% of the value of demersal fish landed inside 6nm.

1. Improved security and economic opportunity for smaller vessels
2. Restabilising links between local fish resources, local fleets and local economies
3. Conflicts between mobile and static fishing gears
4. Improving availability of fish in inshore waters
5. Protection of fish recruitment and stock components
6. Improved management of inshore waters

Signed: [Signature]
[Title]
[Date: 22nd June 2000]
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Respondent’s Name: Dean Murphy

Boat name: Dean Michael & Reg No. S458

Other Fishing Vessels owned

Skipper [ ] tick or Crew [ ] tick Other [ ] tick

Address

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo; [ ]
2. An exclusion of all vessels using trawls over 18m length from inside 6 miles and baselines; [ ]
3. An exclusion of all vessels using trawls over 15m length from inside 6 miles and baselines; [ ]

Other possible options identified or comments:

The basis for my choice is the work presented by DAFM, BIM and MI.

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total landings within the 6nm zone for vessels over 10m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 10m is €12m while the value outside is €229m.

The share of volume and value of landings for vessels over 10m from inside the 6nm zone is small, representing only 6% of the total volume and 5% of the total value.
Value of landings caught within 6nm: When under 10m vessels are excluded from the data, vessels 10-12m in length (153 vessels) land 14% of the remaining volume and 20% of the total remaining value inside 6nm. By comparison, the 12-18m sector (85 vessels) lands 20% of the remaining volume and 32% of the remaining value, while the class over 18m (163 vessels) land 66% and 48% of the total remaining volume and value respectively. As is outlined below, the 10-12m class are 100% dependent on the 5nm zone for all their landings. The 12-18m class is 32% dependent on this zone while the over 18m class is only 2.5% (3% when rounded up) dependent on this zone.

2. Marine Institute Analysis

According to MI if the value of the catch foregone by the over 18m sector inside the 6nm was taken up directly by vessels under 18m, it would represent an increase of €5.5 million to vessels under 18m (for pelagic and demersal gears). This amounts to a reduction of 2.6% in value to vessels over 18m. As the value of the current landings by vessels under 18m is €8.96 million, adding an additional €5.5 million represents a gain of 62% for vessels under 18m. In practice, however, a number of factors would influence this, such as a difference between fishing activity for pelagic and demersal species for smaller vessels, whether the species is controlled by quota or not, and the capacity of the over 18m to catch landings of the same value, especially of quota species, outside 6nm. The significance of this potential gain to the U 18m sector cannot be understated.

Pelagic Fish

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3. Conflicts between mobile and static fishing gears
4. Improving availability of fish in inshore waters
5. Protection of fish recruitment and stock components
6. Improved management of inshore waters

Signed: Dean Murphy
The consultation paper sets down the following possible options:

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2. An exclusion of all vessels using trawls over 18m length from inside 6 miles and baselines;  
3. An exclusion of all vessels using trawls over 15m length from inside 6 miles and baselines.

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6. Improved management of inshore waters

Signed: [Signature] Richard Murphy
Ryan Murphy

Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Respondent’s Name: Ryan Murphy

Other fishing vessels owned

Skipper: tick or Crew: tick Other: tick

Address:

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is:

1. No change to status quo; □
2. An exclusion of all vessels using trawls over 18m length from inside 6 miles and baselines □
3. An exclusion of all vessels using trawls over 15m length from inside 6 miles and baselines □

Other possible options identified or comments:

The basis for my choice is the work presented by DAFM, BIM and MI:

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total landings within the 6nm zone for vessels over 10m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 10m is €12m while the value outside is €229m.

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6. Improved management of inshore waters

Signed: [Signature]
Neil Wallis

Dear Sir or Madam,

By way of input into the public consultation on trawling activity within 6 nautical miles, please see copy of a letter below, sent to the minister for agriculture and copied to the minister for tourism.

The letter focuses mainly on the impact of pair trawling in Kenmare Bay.

As a regular visitor to Ireland for over half a century and a keen fisherman, the failure to conserve fish and dependent wild species has led me to reduce the number of family visits we make to Ireland, to the point where we may cease to visit altogether.

Yours sincerely, Neil Wallis

Dear Mr. Creed,

I'm writing to you as a frequent visitor to Ireland (over about 50 years) as a fisherman and lover of wild places. I am writing to express my concern about two issues which came to my attention during my latest visit to County Kerry in July this year. Both issues had a significant impact on my appreciation of the holiday and, more critically, raised worries about what is happening to the natural environment and wildlife populations in SW Ireland.

Having visited the Kenmare Bay many times over the years, I am very aware that the quantity of wildlife in the bay has diminished severely. In the past, I have seen large pods of dolphins in the bay (even the occasional whale). Shoals of mackerel breaking were a frequent site, with accompanying flocks of seabirds, including the spectacular sight of diving gannets. In more recent years, possibly over the last decade, dolphins have become a rare sight and it has become harder and harder to catch mackerel and pollack in the bay. The sparsity of seabirds provides testimony to the fact that smaller fish are absent; vital as they are at the base of the marine food chain.

My experience has been corroborated by several people who live near Kenmare Bay.

I understand that around ten years ago, pair trawlers were seen for the first time in Kenmare Bay. The trawlers, working in tandem from either side of the bay, target the sprat - rather a 'low value' species, but one on which many larger sea fish and mammals depend.

I can't imagine that the economic value to the Irish economy of pair trawling can possibly come anywhere close to that of tourism along the 'Wild Atlantic Way' (linked to leisure angling) plus the value of the activities of the long-standing, small scale, local fishing industry. Many visitors, like me, expect to see marine wildlife in these 'wild places'; indeed it is one of the main reasons for visiting Ireland and a key differentiating factor when considering other possible holiday destinations. Just look at the tourism impact and value of a single

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dolphin - Fundhla - in Dingle, for example.)

I urge you to urgently consider the effect of pair trawling on other marine reserves with its knock-on impact on the wider economy and tourism potential of South Kerry.

I would also like to draw your attention to the plight - and impact on the local economy - of Lough Currane. The internationally-renowned seatrout fishing on the Waterville system has been in sharp decline for several years and seems to be linked to the profusion of sea lice resulting from the presence of salmon farms situated close the mouth of Kenmare Bay. I have fished the beautiful Lough Currane many times over the years and can offer my personal experience to that of many others (featured in regular reports on the angling there) that the seatrout numbers have declined sharply to the extent that catching a fish (of any size) is quite a rare thing. As you know, the economy around Waterville depends heavily on tourism and much of that is linked to the lake angling. It's clear from the numbers of boats now regularly on the lake that fewer and fewer people are choosing to fish there.

I believe a fully impartial inquiry into the impacts of inshore salmon farming on the seatrout population in Lough Currane, and similarly affected local fisheries, is overdue. The decline in fish stocks in SW Ireland and the 'unwilding' of the so-called 'Wild Atlantic Way' is making me seriously consider whether I will return on holiday again, particularly considering the long travel time and quite high cost of being there.

I urge you to make sure that Ireland acts to properly preserve its treasured natural and wild resources; it's surely both the right thing to do and economically sensible considering the importance of tourism to the Irish economy.

Yours sincerely,

Neil Wallis
Damien Turner

Dear Minister,

I am Damien Turner, owner and Skipper of [redacted] a 24m Seine net vessel from port of Castletownbere. I am opposed to the current 6 mile exclusion limit for trawlers/seiners for the following reasons.

My current license and entitlements are already restrictive. Presently, I am excluded from fishing in ICES areas 6a & 7a.

17 years ago after my previous vessel was lost at sea due to fire, I purchased [redacted]. I transferred the tonnage & Kw plus a small amount of additional tonnage to license this vessel. However, my herring and mackerel entitlements were withheld.

This obviously had an enormous impact on the value of her license and the earning capabilities of my vessel. A proposed further restrictions will undoubtedly have further financial implications.

As Master of the vessel, I am responsible for the safety of the vessel and crew aboard her. I am also responsible for their financial wellbeing. At times in adverse weather conditions, I avail of the protection of the coastline to be able to continue my fishing operations and thus providing a wage for my crew and their families. I have never encountered any problems or objections from the smaller inshore vessels.

Similarly the reverse occurs with fine weather. Smaller vessels move off shore and take advantage of this.

If such a restriction was to come into effect, has your department given any consideration to a compensation scheme for vessel owners and crew?

There are different methods of trawling and gear targeting different species. I am not sure what a simplified ban hopes to achieve. I congratulate you on your commitment to the inshore Fisheries. With the use of VMS and the small fleet in the state, it should be relatively easy to identify individual vessels activities. If a problem exists with a particular fishing practice it can be addressed.

Another concern and worry this proposal is a safety factor for the smaller vessel. I am sure there are many such type vessels operating around our coast from little harbours and piers down our bays. For them to have to come outside six miles from the base line, I feel may put them in danger from weather etc. We have seen too many accidents with devastating consequences for families within our industry. Thankfully, we have made great strides with safety in recent years and I think this proposal is a step in the wrong direction and adding a risk factor.

Yours sincerely

Damien Turner
Daniel Melly

Dear Minister,

I am an employee of Atlantic Dawn Group. Our company owns and operates polyvalent vessels that catch much of their quota locally here in Donegal. The company also has a freezing factory-Arctic Fish Processing. I am availing of this opportunity to make a submission to you as part of the public consultation for the Review of Trawling Activity Inside the 6 Nautical Mile Zone in Irish waters. Our work is seasonal and we rely on the local fleet to supply fresh fish for our production.

A number of vessels from within the polyvalent segment of the fleet are regular suppliers to us. I am therefore very concerned to learn that new regulations could be imposed that would prohibit these vessels from catching within the 6 Nautical Mile Zone.

I wish to urge you strongly to maintain the status quo in this fishery so that there is no change in the fishing opportunities for vessels above 18m.

I am very sure if these vessels were precluded from catching within the 6 Nautical Mile Zone valuable fishing opportunities would be lost resulting in production in our freezing factory where I work. The loss simply would not and cannot be compensated for by the smaller dedicated inshore vessels. This is particularly true for Sprat, Horse Mackerel, and North West Herring.

It is important that we do not throw away valuable fishing opportunities,

Many thanks for considering my views on this matter.

Yours Faithfully,

Daniel A. Melly
John D. Sullivan

Dear Minister,

I have serious concerns about the proposals to restrict access for fishing inside six mile Zone, any change to existing Policy will have serious consequences financially for our Business and the viability of the [redacted] and livelihoods of crew of Seven.

Her Fishing activities which includes Trawling Demersal Species and Pair Pelagic Species: Herring, Scad, Sprat, Etc., removal of access to inshore seasonal Pelagic Species for this type of Vessel would make it no longer Viable.

The safety of these type of Vessel, would be a major concern in bad weather conditions to fish Bulk Pelagic Species outside 6 Miles from Baseline would be 24 Miles from Castletownbere, 25 Miles from Dingle, 30 miles from Rossaveal.

We fully agree to put management structures in place, to protect all Spawning Stock of Pelagic, Demersal & Shellfish and fully support the IS&WFPO and the IFPEA submissions to this consultation.

I understand that the Common Fishery Policy of 2013 and also of 2002 make clear that access to the inshore waters of the State must remain open to all classes of fishing enterprise without Fishing discrimination and we therefore submit there should be no change to the existing Policy.

Yours faithfully

John D Sullivan.

Kate Carmody

To whom it may concern,

I wish to make a brief submission on the above mentioned consultation.

Having read all the documents provided, it would be in the public’s interest and that of our biodiversity, to ban all trawling within the 6nm limit. It seems unreasonable to me to designate many of these areas as SACs and then to allow trawlers in, to sweep the areas of vital food sources of the marine food chain.

I overlook the Shannon Estuary, SAC and watch the small trawlers, pair fish. This is an EU dolphin sanctuary and therefore it should be protected. It also strikes me as being very ironic that the local fishermen were banned from fishing for salmon here, yet these trawlers were permitted.

Yours sincerely,

Kate Carmody.
Dear Minister Creed,

I would like to make a submission to the above-mentioned consultation.

It is very welcome that restrictions on trawling within the 6 nautical mile zone are being considered by your Department and I would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency. This would provide an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

While our oceans are a great resource to Ireland and a source of income through fishing activity, this fishing activity must be carried out in a sustainable manner. Our marine ecosystems and fish populations must be allowed to recover from the stresses placed on them by the large scale commercial fishing activity common in our waters. Protecting the 6-mile nautical zone from bottom trawling and pair-trawling would at least provide some protection to our marine ecosystems and may even allow small scale nearshore fishing recover and become a viable local source of employment again.

It is the responsibility of the Government of Ireland to manage our natural resource for the benefit of all and not just the large scale fishing industry. Please protect the resource for the future and ban trawling in the 6 mile zone.

Regards,
Mr Kieran Flood
Michael Meade

DEAR MINISTER CREED

I own and fish the vessel [redacted]

we operate seine net and rock hopper for white fish within the six mile in certain area's

especially in bad weather its a vital part of our earnings and we never have any problems with other vessels

we also pair pelagic for herring mackerel and scad inside the six mile in the celtic sea or the donegal and mayo coasts

I disagree with proposed change to the current arrangements and it seems to me that the real problems are not being addressed properly a blanket ban is not the answer

yours faithfully

[Signature]

MICHAEL MEADE

BUDDY M
Submission for Public Consultation on a review of Trawling Activity inside the 6 Nautical Mile Zone.

Dear Sirs,

I bought our house on the North shore of the Beara Peninsular in 2003 partly on the strength of seeing dolphins from the garden on our second viewing. We have lived there full time since 2009 and have enjoyed the extensive views of Kenmare Bay and the marine life associated with it. I am also out on the water as an active sailor both in the local area and the wider coastal regions of Ireland.

Over the years, in the summer season, I have been able to fish off the rocks below the house to catch mackerel for the table. In the past whilst cleaning them, I have noted up to thirteen or fourteen sprat or whitebait in the gut of the larger fish.

In the early years there were extensive sightings of Dolphins, large fish jumping, as well as Gannets, Cormorants and other sea birds pursuing fish as their prey.

Recent years have seen much reduced sightings of all species and Dolphins are now very rare above Kilmakilloge. My ability to catch mackerel off the rocks is much reduced, those caught are smaller and not containing any prey.

At the same time we have witnessed pair trawling for sprat/whitebait, over all day periods, often going into the night. The method appears to have become more sophisticated over the years, now using hydraulic emptying of the nets to speed the time between passes up and down the river estuary. The most recent foray resulted in so big a haul being pumped into one of the trawlers that it assumed an extreme bow down attitude and looked as if it would plough under as it steamed away down the bay.

The trawlers are operating with their AIS switched off. When their track history is viewed on the Web, it is clear that the AIS is turned off as they approach the entrance to the bay, implying a clandestine activity.

We have a holiday cottage each side of our house and have met annually returning guests who have remarked on the reduced sea life over the years and fewer fish to catch down on the rocks!

It seems highly probable that the intensive trawling is removing an important layer of the marine food chain in the bay, and thus affecting the species higher up which are either reduced in number or moving to more rewarding areas to meet their needs.

These species are an important part of the attraction for both residents and visitors to this historically attractive area as well as the lifeblood of the individual small boat fishermen who operate out of the local harbours like Kilmakilloge, Blackwater, West Cove, Sneem etc. Many of these have been forced to give up and sell their boats because of the reduction in available catch to sustain them.

I urge you to exclude all vessels over 15m length using trawls from inside six miles and base lines.
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Respondent’s Name
Boat Name
Reg No.
Other fishing vessels owned:
Skipper/crew (Tick)
Address

Phone no.
Email

The consultation paper sets down the following possible options and my choice is:

___ No change to status quo;

✓ An exclusion of all vessels using trawls over 18m length from inside 6 miles and baselines;

___ An exclusion of all vessels using trawls over 15m length from inside 6 miles and baselines.

(Tick as appropriate)

Signed: ____________________________

Name withheld
Response to Public Consultation on Minister’s Review of Trawling
Inside the 6 Nautical Mile Zone

Respondent’s Name
Beat Name
Reg No.
Other fishing vessels owned:
Skipper___ Crew___ (Tick)
Address

Phone no.
Email

The consultation paper sets down the following possible options and my choice is:

___ No change to status quo;

X An exclusion of all vessels using trawls over 18m length from inside 6 miles and baselines;

___ An exclusion of all vessels using trawls over 15m length from inside 6 miles and baselines.

(Tick as appropriate)

Signed: [Redacted]
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Respondent’s Name

Boat Name

Reg No.

Other fishing vessels owned:

Skipper [ ] Crew [X] (Tick)

Address

Phone no.

Email

The consultation paper sets down the following possible options and my choice is:

[ ] No change to status quo;

[ ] An exclusion of all vessels using trawls over 18m length from inside 6 miles and baselines;

[ ] An exclusion of all vessels using trawls over 15m length from inside 6 miles and baselines.

(Tick as appropriate)

Signed:
Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.V. Colmcille G186, Carmarose S0555 and Westward Isle G185 which have a registered length of 23.96 metres would be banned from fishing inside the 6 nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong, if the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curtin says “it is assumed that if less than half (50%) of the species catch is caught within the 6nm zone then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

Pat Byrne

70
Brendan Boyle

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.F.V. Colmculs, Carmerose and Westward Isle which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring Fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong, if the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curin says “It is assumed that; if less than half (50%) of the species catch is caught within the 6nm zone then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

Brendan Boyle
Jimmy Byrne

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.F.V. Coimcille, Carmarose and Westward Isle, which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerei and Herring inside the 6-mile zone for over 20 years. For Horse Mackerei they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerei are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong, if the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curtin says "It is assumed that; if less than half (50%) of the species catch is caught within the 6nm zone then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, there will be no net impact, only a redistribution of effort" is totally beyond all belief.

Signed

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72
Other possible options identified or comments:

The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies this potential benefit to the Commercial Inshore Fishing Sector, the Marine Tourism Industry and by extension the wider economies of coastal communities due to a potential increase in employment in these sectors and through a healthier Marine Environment. Operators in these Sectors are highly dependent on the Biological resources inside the 6nm limit in contrast to vessels over 15m/18m (as per my choice above) in length, and are fundamentally important to the economies of Coastal Communities.

It is clear from work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their economic viability and overall I believe this measure can only significantly benefit the economies of Coastal Communities.

Signed: ______________________________
Date: ______________________
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

I am making this response not only as a member of a Coastal Community but as someone who is dependent on a business in a Coastal Community. This Business both depends on and benefits from, a vibrant inshore Commercial Fishing Sector, Marine Tourism and a healthy local Marine environment.

Respondent’s Name

Business name

Nature of Business

I am the: Business owner Employee Other

Address

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below.

1. No change to status quo,

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

I am making this response not only as a member of a Coastal Community but as someone who is dependent on a business in a Coastal Community. This Business both depends on and benefits from, a vibrant Inshore Commercial Fishing Sector, Marine Tourism and a healthy local Marine environment.

Respondent’s Name: James Curran

Business name: A Taste of Kerry

Nature of Business: Butcher and Grocer

I am the: Business owner [✓] Employee [ ] Other [ ]

Address: [Redacted]

Phone no: [Redacted]

Email: [Redacted]

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo,

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines
Other possible options identified or comments:

The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies this potential benefit to the Commercial inshore Fishing Sector, the Marine Tourism Industry and by extension the wider economies of coastal communities due to a potential increase in employment in these sectors and through a healthier Marine Environment. Operators in these Sectors are highly dependent on the Biological resources inside the 6nm limit in contrast to vessels over 15m/18m (as per my choice above) in length, and are fundamentally important to the economies of Coastal Communities.

It is clear from work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their economic viability and overall I believe this measure can only significantly benefit the economies of Coastal Communities.

Signed: ________________
Date: 24/3/18
Mary Corkery

Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

I am making this response as a resident of a Coastal Community [ ]

OR

A visitor to a Coastal Community [ ]

Who values and appreciates the importance of, a vibrant sustainable Inshore Commercial Fishing Sector, the Marine Tourism sector and having a healthy local Marine environment to that Coastal Community.

Respondent’s Name: Mary Corkery

Address:

Phone no: [black]

Email:

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo, [ ]

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines [ ]

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines [ ]

Other possible options identified or comments:
The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies the potential benefit to the wider Coastal Communities. The economies of these communities are highly dependent on the Biological Marine resources inside the 6nm.

It is clear from work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their specific economic viability and overall I believe this measure can only significantly benefit the wider economies of Coastal Communities.

Signed: ____________________________
Date: ________________
Meabh Cournane

Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

I am making this response as a resident of a Coastal Community ✓ tick

OR

A visitor to a Coastal Community tick

Who values and appreciates the importance of, a vibrant sustainable Inshore Commercial Fishing Sector, the Marine Tourism sector and having a healthy local Marine environment to that Coastal Community.

Respondent’s Name: Meabh Cournane

Address:

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo, 

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines ✓

Other possible options identified or comments:
The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies the potential benefit to the wider Coastal Communities. The economies of these communities are highly dependent on the Biological Marine resources inside the 6nm.

It is clear from work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their specific economic viability and overall I believe this measure can only significantly benefit the wider economies of Coastal Communities.

Signed: __________________________

Date: 31/5/18
Connie Cunningham

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.V. Colmcille, Carmarose and Westward Isle which have a registered length of 23.96 metres would be banned from fishing inside the 6 nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-miles zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong. If the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curtin say's “It is assumed that; if less than half (50%) of the species catch is caught within the 5nm zone then upon exclusion the previous quantities can be caught outside the 5nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

Connie Cunningham
Eddie Cunningham

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.F.V. Colmcille, Carmarose and Westward Isle which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong. If the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curtin says “It is assumed that; if less than half (50%) of the species catch is caught within the 6nm zone then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

[Signature]
Response to Public Consultation on Minister's Review of Trawling inside the 6 Nautical Mile Zone

Respondent's Name: Gearoid Moran

Other Fishing Vessels owned

Skipper or Crew: ✓

Address:

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is:

1. No change to status quo;)
2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines ✔
3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines

Other possible options identified or comments:

Keep all trawlers over 18m outside 6 miles
Keep all gillnetters and potifiers over 18m outside 6 miles.

The basis for my choice is the work presented by DAFM, BIM and MI:

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total
Response to Public Consultation on Minister's Review of Trawling inside the 6 Nautical Mile Zone

Landings within the 6nm zone for vessels over 18m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 18m is €12m while the value outside is €225m.

The share of volume and value of landings for vessels over 18m from inside the 6nm zone is small, representing only 6% of the total volume and 5% of the total value.

Value of landings caught within 6nm: When under 18m vessels are excluded from the data, vessels 10-12m in length (153 vessels) land 14% of the remaining volume and 20% of the total remaining value inside 6nm. By comparison, the 12-18m sector (85 vessels) land 20% of the remaining volume and 33% of the remaining value, while the class over 18m (163 vessels) land 60% and 48% of the total remaining volume and value respectively. As is outlined below, the 10-12m class are 100% dependent on the 6nm zone for all their landings. The 12-18m class is 32% dependent on this zone while the over 18m class is only 2.6% (9% when rounded up) dependent on this zone.

According to MI if the value of the catch foregone by the over 18m sector inside the 6nm was taken up directly by vessels under 18m, it would represent an increase of €5.5 million to vessels under 18m (for pelagic and demersal gears). This amounts to a reduction of 2.6% in value to vessels over 18m. As the value of the current landings by vessels under 18m is €8.96m, adding an additional €5.5m represents a gain of 62% for vessels under 18m. In practice, however, a number of factors would influence this, such as a difference between fishing activity for pelagic and demersal species for smaller vessels, whether the species is controlled by quota or not, and the capacity of the over 18m to catch landings of the same value, especially of quota species, outside 6nm. The significance of this potential gain to the Inshore sector whose dependency is greater within the 6nm zone cannot be understated. The future viability of the Inshore sector is at risk if it is not realised.

Pelagic Fish

Just over half of the estimated reduction of €5.5m to the over 18m vessels, if excluded from waters inside 6nm, and representing 2.6% of their value of landings, relates to pelagic trawling.

Demersal fish

Vessels over 18m in length land an estimated €2.58m worth of demersal fish from inside 6nm. These are mostly quota species and this represents 2.6% of the value of demersal fish landed inside 6nm

1. Improved security and economic opportunity for smaller vessels
2. Re-establishing links between local fish resources, local fleets and local economies
3. Conflicts between mobile and static fishing gears
4. Improving availability of fish in inshore waters
5. Protection of fish recruitment and stock components
6. Improved management of inshore waters

Signed: [Signature]
Date: 5-6-18

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Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Respondent’s Name: Kieran Molloy

Boat name: [redacted] & Reg No: [redacted]

Other Fishing Vessels owned: [redacted]

Skipper ☑ or Crew ☐ Other ☐

Address: [redacted]

Phone no: [redacted]

Email: [redacted]

The consultation paper sets down the following possible options:

My Choice is:

1. No change to status quo; ☐
2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines; ☐
3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines ☑

Other possible options identified or comments:

Perhaps limiting inside 6m to vessels under 12m OR length might have a greater impact on the recovery of this fishery.

The basis for my choice is the work presented by DAFM, BIM and MI:

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total
Landings within the 6nm zone for vessels over 10m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 10m is €12m while the value outside is €229m.

The share of volume and value of landings for vessels over 10m from inside the 6nm zone is small, representing only 6% of the total volume and 5% of the total value.

Value of landings caught within 6nm: When under 10m vessels are excluded from the data, vessels 10-12m in length (153 vessels) land 14% of the remaining volume and 20% of the total remaining value inside 6nm. By comparison, the 12-18m sector (85 vessels) lands 29% of the remaining volume and 32% of the remaining value, while the class over 18m (163 vessels) land 66% and 48% of the total remaining volume and value respectively. As is outlined below, the 10-12m class are 100% dependent on the 6nm zone for all their landings. The 12-18m class is 92% dependent on this zone while the over 18m class is only 2.6% (3% when rounded up) dependent on this zone.

According to Mr. If the value of the catch foregone by the over 18m sector inside the 6nm was taken up directly by vessels under 18m, it would represent an increase of €5.5m to vessels under 18m (for pelagic and demersal gears). This amounts to a reduction of 2.6% in value to vessels over 18m.

As the value of the current landings by vessels under 18m is €89.6m, adding an additional €5.5m represents a gain of 62% for vessels under 18m. In practice, however, a number of factors would influence this, such as a difference between fishing activity for pelagic and demersal species for smaller vessels, whether the species is controlled by quota or not, and the capacity of the over 18m to catch landings of the same value, especially of quota species outside 6nm. The significance of this potential gain to the Inshore sector whose dependency is greater within the 6nm zone cannot be understated. The future viability of the Inshore sector is at risk if it is not realised.

Pelagic Fish

Just over half of the estimated reduction of €5.5m to the over 18m vessels, if excluded from waters inside 6nm, and representing 2.6% of their value of landings, relates to pelagic trawling.

Demersal Fish

Vessels over 18m in length land an estimated €2.58m worth of demersal fish from inside 6nm. These are mostly quota species and this represents 2.6% of the value of demersal fish landed inside 6nm.

1. Improved security and economic opportunity for smaller vessels
2. Restabilising links between local fish resources, local fleets and local economies
3. Conflicts between mobile and static fishing gears
4. Improving availability of fish in inshore waters
5. Protection of fish recruitment and stock components
6. Improved management of inshore waters

Signed: Martin Kelly
Date: 5/6/2018
Response to Public Consultation on Minister's Review of Trawling inside the 6 Nautical Mile Zone

Respondent's Name: Donal Murphy

Boat name: [redacted] & Reg No.: [redacted]

Other Fishing Vessels owned:

Skipper or Crew: [redacted]

Address:

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is:

1. No change to status quo;

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines

Other possible options identified or comments:

The basis for my choice is the work presented by DAFM, BIM and MI:

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Landings within the 6nm zone for vessels over 10m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 10m is €12m while the value outside is €229m.

The share of volume and value of landings for vessels over 10m from inside the 6nm zone is small, representing only 6% of the total volume and 5% of the total value.

Value of landings caught within 6nm: When under 10m vessels are excluded from the data, vessels 10-12m in length (153 vessels) land 14% of the remaining volume and 20% of the total remaining value inside 6nm. By comparison, the 12-18m sector (85 vessels) lands 20% of the remaining volume and 32% of the remaining value, while the class over 18m (163 vessels) land 60% and 48% of the total remaining volume and value respectively. As is outlined below, the 10-12m class are 100% dependent on the 6nm zone for all their landings. The 12-18m class is 32% dependent on this zone while the over 18m class is only 2.6% (3% when rounded up) dependent on this zone.

According to MRI, if the value of the catch foregone by the over 18m sector inside the 6nm was taken up directly by vessels under 18m, it would represent an increase of €5.5 million to vessels under 18m (for pelagic and demersal gears). This amounts to a reduction of 2.6% in value to vessels over 18m. As the value of the current landings by vessels under 18m is €8.95m, adding an additional €5.5m represents a gain of 62% for vessels under 18m. In practice, however, a number of factors would influence this, such as a difference between fishing activity for pelagic and demersal species for smaller vessels, whether the species is controlled by quota or not, and the capacity of the over 18m to catch landings of the same value, especially of quota species, outside 6nm. The significance of this potential gain to the Inshore sector whose dependency is greater within the 6nm zone cannot be understated. The future viability of the Inshore sector is at risk if it is not realised.

Pelagic Fish

Just over half of the estimated reduction of €5.5m to the over 18m vessels, if excluded from waters inside 6nm, and representing 2.6% of their value of landings, relates to pelagic trawling.

Demersal fish

Vessels over 18m in length land an estimated €2.58m worth of demersal fish from inside 6nm. These are mostly quota species and this represents 2.6% of the value of demersal fish landed inside 6nm.

1. Improved security and economic opportunity for smaller vessels
2. Restabilising links between local fish resources, local fleets and local economies
3. Conflicts between mobile and static fishing gears
4. Improving availability of fish in inshore waters
5. Protection of fish recruitment and stock components
6. Improved management of inshore waters

Signed: [Signature]
Date: 2-6-2018
Response to Public Consultation on Minister’s Review of Trawling Inside the 6 Nautical Mile Zone

Respondent’s Name: John Patrick Murphy

Boat name: [redacted] & Reg No: [redacted]

Other Fishing Vessels owned

Skipper ✓ tick or Crew ✓ tick Other ✓ tick

Address:

Phone n: [redacted]

Email: [redacted]

The consultation paper sets down the following possible options:

My Choice is:

1. No change to status quo; ✓

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines ☐

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines ☐

Other possible options identified or comments:

Small Boats for the inshore waters.
And Big Boats for deep water, plenty fish for Big Boats out There.
We Must look to The future for
The inshore Fisherman

The basis for my choice is the work presented by DAFM, BIM and MI:

These reports indicate that it is the view of the MI and BIM that vessels under 12m have a very high reliance on fishing inside the 6 mile zone and baselines. The MI reports also set out that in the case of vessels between 12 and 15m, the value of landings is 52% which would also indicate a majority reliance on these waters. Total
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

Landings within the 6nm zone for vessels over 10m are 15,000 tonnes compared to 237,000 tonnes outside the 6nm zone. The value within the 6nm zone for vessels over 10m is €12m while the value outside is €229m.

The share of volume and value of landings for vessels over 10m from inside the 6nm zone is small, representing only 6% of the total volume and 5% of the total value.

Value of landings caught within 6nm: When under 10m vessels are excluded from the data, vessels 10-12m in length (153 vessels) land 14% of the remaining volume and 29% of the total remaining value inside 6nm. By comparison, the 12-18m sector (85 vessels) lands 20% of the remaining volume and 32% of the remaining value, while the class over 18m (16 vessels) land 66% and 48% of the total remaining volume and value respectively. As is outlined below, the 10-12m class are 100% dependent on the 6nm zone for all their landings. The 12-18m class is 32% dependent on this zone while the over 18m class is only 2.6% (3% when rounded up) dependent on this zone.

According to MI if the value of the catch foregone by the over 18m sector inside the 6nm was taken up directly by vessels under 18m, it would represent an increase of €5.5 million to vessels under 18m (for pelagic and demersal gears). This amounts to a reduction of 2.6% in value to vessels over 18m. As the value of the current landings by vessels under 18m is €8.96m, adding an additional €5.5m represents a gain of 62% for vessels under 18m. In practice, however, a number of factors would influence this, such as a difference between fishing activity for pelagic and demersal species for smaller vessels, whether the species is controlled by quota or not, and the capacity of the over 18m to catch landings of the same value, especially of quota species, outside 6nm. The significance of this potential gain to the inshore sector whose dependency is greater within the 6nm zone cannot be understated. The future viability of the inshore sector is at risk if it is not realised.

Pelagic Fish

Just over half of the estimated reduction of €5.5m to the over 18m vessels, if excluded from waters inside 6nm, and representing 2.6% of their value of landings, relates to pelagic trawling.

Demersal fish

Vessels over 18m in length land an estimated €2.58m worth of demersal fish from inside 6nm. These are mostly quota species and this represents 2.6% of the value of demersal fish landed inside 6nm.

1. Improved security and economic opportunity for smaller vessels
2. Re-establishing links between local fish resources, local fleets and local economies
3. Conflicts between mobile and static fishing gears
4. Improving availability of fish in inshore waters
5. Protection of fish recruitment and stock components
6. Improved management of inshore waters

Signed: John Patrick Murphy
Date: 5 June 2018
Declan McMenamin

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods, one of the main employers in Killybegs. The M.F.V. Colmcille, Camarose and Westward Isle, which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong. If the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curtin says “It is assumed that; if less than half (50%) of the species catch is caught within the 6nm zone then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

[Signature]
Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

I am making this response as a resident of a Coastal Community ✓ tick

OR

A visitor to a Coastal Community ____ tick

Who values and appreciates the importance of, a vibrant sustainable Inshore Commercial Fishing Sector, the Marine Tourism sector and having a healthy local Marine environment to that Coastal Community.

Respondent’s Name Gillian McCarthy

Address

Phone no:

Email:

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo, □

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines ✓

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines □

Other possible options identified or comments:
I was born in Cork and reared near a fishing community and I would like to see inshore fishing and the farming it generates prosper in this locality as well.

The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies the potential benefit to the wider Coastal Communities. The economies of these communities are highly dependent on the Biological Marine resources inside the 6nm.

It is clear from the work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their specific economic viability and overall I believe this measure can only significantly benefit the wider economies of Coastal Communities.

Signed: [Signature]
Date: 31/05/18
Stephne Moriarty

Response to Public Consultation on Minister’s Review of Trawling inside the 6 Nautical Mile Zone

I am making this response as a resident of a Coastal Community [ ] tick

OR

A visitor to a Coastal Community [ ] tick

Who values and appreciates the importance of, a vibrant sustainable Inshore Commercial Fishing Sector, the Marine Tourism sector and having a healthy local marine environment to that Coastal Community.

Respondent’s Name: STEPHEN MORIARTY

Address:

Phone no: __________________________

Email: __________________________

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo.

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines

Other possible options identified or comments:
The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies the potential benefit to the wider Coastal Communities. The economies of these communities are highly dependent on the Biological Marine resources inside the 6nm.

It is clear from work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their specific economic viability and overall I believe this measure can only significantly benefit the wider economies of Coastal Communities.

Signed: ____________________________
Date: 1/6/18

95
Carmel Moran

Response to Public Consultation on Minister's Review of Trawling inside the 6 Nautical Mile Zone

I am making this response as a resident of a Coastal Community □ tick

OR

A visitor to a Coastal Community □ tick

Who values and appreciates the importance of, a vibrant sustainable Inshore Commercial Fishing Sector, the Marine Tourism sector and having a healthy local Marine environment to that Coastal Community.

Respondent’s Name: Carmel Moran

Address: [Redacted]

Phone no: [Redacted]

Email: [Redacted]

The consultation paper sets down the following possible options:

My Choice is: Please tick your box below

1. No change to status quo, □

2. An exclusion of all vessels, using trawls, over 18m length from inside 6 miles and baselines □

3. An exclusion of all vessels, using trawls, over 15m length from inside 6 miles and baselines □

Other possible options identified or comments:
The basis for my choice is on the work presented by DAFM, BIM and MI in the various documents published on the DAFM Website as part of this Public Consultation.

I believe this work identifies the potential benefit to the wider Coastal Communities. The economies of these communities are highly dependent on the Biological Marine resources inside the 6nm.

It is clear from work published on the DAFM Website as part of this Consultation that excluding Fishing Vessels over 15m/18m (as per my choice above) using trawls, will not be detrimental to their specific economic viability and overall I believe this measure can only significantly benefit the wider economies of Coastal Communities.

Signed: 

Date: 20/5/18
Terry McNulty

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.F.V. Colmcille [redacted], Carmarose [redacted] and Westward Isle [redacted] which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong. If the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

In the BIM report Richard Curtin says’s “it is assumed that if less than half (50%) of the species catch is caught within the 6nm zone then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

[Signature]

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98
Breege McGuinness

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods, one of the main employers in Killybegs. The M.V. Colmcille, Carmarose and Westward both have a registered length of 23.96 metres and would be banned from fishing inside the 6 nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline. These smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong. If the fish were available to them outside the 6-mile zone it would be an easier option, all round, easier on gear and away from the rocks.

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Signed

Breege McGuinness
Daragh McGuiness

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods one of the main employers in Killybegs. The M.V. Colmcille Camarose and Westward Isle which have a registered length of 23.56 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong. If the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

The BIM report lists a loss of €425,000 for 14 vessels in total, this is an unsustainable loss for these vessels. The report also includes figures for vessels which currently have no access to this zone and says the sector would have a small loss.

Signed

Daragh McGuiness
Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.F.V. Cloncelt, Carmarosa and Westward Isle, which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

This would deny them access to their traditional fishing grounds on the west coast of Ireland. They have fished Horse Mackerel and Herring inside the 6-mile zone for over 20 years. For Horse Mackerel they rely heavily on the inshore grounds along the Donegal and Mayo coastline, these smaller R.S.W. vessels do not have the ability to fish the deeper waters on the west coast where larger Horse Mackerel are caught by the bigger vessels. In 2015 and 2016 they failed to catch all their Horse mackerel quota when the fish did not show up inshore. Right now, the Herring fishery is almost closed but when it returns this too will be inside the 6-mile zone, all the recent surveys have shown this. To deny them their rights to fish inshore is just wrong, if the fish were available to them outside the 6-mile zone it would be an easier option all round, easier on gear and away from the rocks.

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Signed
John Murrin

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.V. Colmcille, Carmarose and Westward Isle, which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

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In the BIM report Richard Curtin says “It is assumed that; if less than half (50%) of the species catch is caught within the 5nm zone then upon exclusion the previous quantities can be caught outside the 5nm zone. Therefore, there will be no net impact, only a redistribution of effort” is totally beyond all belief.

Signed

John Murrin
Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.F.V. Colmcille, Camarose and Westward Isle, which have a registered length of 23.96 metres would be banned from fishing inside the 6-nautical mile zone.

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Signed

[Signature]

Cathryn McBride
Seamus McGuiness

Dear Minister,

I am writing to you in response to the public consultation on trawling inside the 6 nautical mile zone. I urge you to make no change to the status quo, as doing so could have serious consequences for some of the vessels supplying fish to Killybegs Seafoods which is where I am employed. The M.V. Carmarose and Westward Isle, which have a registered length of 23.96 metres would be banned from fishing inside the 6 nautical mile zone.

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Signed

Seamus McGuiness