



Re: Detailed Scrutiny of the Island Fisheries [Heritage Licenses] Bill

To the Clerk to the Committee

I am aware that you have received submissions highlighting the focus that the Common Fisheries Policy rightly places on the needs of the small scale sector in Europe and I will not seek to repeat them here with the exception of a reference to Article 16 [6] that clarifies the responsibility of the member state to determine the allocation of quota and Article 17:

*6. Each Member State shall decide how the fishing opportunities that are allocated to it, and which are not subject to a system of transferable fishing concessions, may be allocated to vessels flying its flag (e.g. by creating individual fishing opportunities). It shall inform the Commission of the allocation method].*

Article 17 places a legal requirement on member states to include environmental, economic and social criteria when deciding upon the allocation of the national quota.

*17. When allocating the fishing opportunities available to them, as referred to in Article 16, Member States shall use transparent and objective criteria including those of an environmental, social and economic nature. The criteria to be used may include, inter alia, the impact of fishing on the environment, the history of compliance, the contribution to the local economy and historic catch levels. Within the fishing opportunities allocated to them, Member States shall endeavour to provide incentives to fishing vessels deploying selective fishing gear or using fishing techniques with reduced environmental impact, such as reduced energy consumption or habitat damage.*

I also note the requirement attached to the Irish Polyvalent General Fishing License at Appendix III that rightly recognizes the need to 'demonstrate the extent of the social and economic benefit accruing to the local coastal communities arising from the operation of the boat'.

Taken together, these elements add very significant support to the focus of the Island Fisheries [Heritage Licenses] Bill. They underline the common sense approach that by allocating quota against these three main criteria, not only as a legal requirement but also based on the fact, self evident to all apart from the current beneficiaries of the vast majority of the national quota, that a more equitable balance provides far more benefits to society than the current methodology that is both unfair and illegal.

The challenges to the survival of the fishermen of the Irish Islands mirror those faced by fishermen in similar geographical situations across Europe. In the UK, the under ten metre fleet, despite being

77% of the fleet by number has access to only 4% of the national quota. It is a similar story across Europe and in fact globally.

Tragically, it is so often the case that the restrictions imposed on small scale, artisanal fishers as a result of the reduction of fish stocks are not of their making yet they suffer drastically and disproportionately nevertheless. It is clear that the widespread overfishing of many stocks by the larger scale fleet, both national and European, over many years, using generally unselective mobile gears has reduced fishing opportunities across Europe.

It is a fundamental unfairness that those who have the least impact on stocks and the wider marine environment, and who use mainly passive gears with a high degree of selectivity are made to pay for the sins of others.

The Island Fisheries [Heritage Licenses] Bill seeks to address this unfairness through the provision of heritage licenses that would facilitate traditional fishing practices in conjunction with the establishment of a producer organization representing vessels under a certain LOA in designated areas.

There are a number of very significant benefits to be accrued from the support and protection of the small scale fleet, in Ireland as elsewhere. Prime among these of course is the preservation of life on remote islands in the face of the myriad threats facing these diminishing populations. The ability to capture prime fish in the first place, together with the opportunities for small scale added value processing and marketing have been shown to deliver significant economic benefits and help to support the overarching tourist experience, as well in relation to food production generally. In tourist terms, the presence of small scale fishing vessels in an area has been proven to be a positive attractant as part of the tourist experience. In a University study based on the beach launched small scale fleet in Hastings, England, just the presence of the boats on the beach alone added 8m euro to the tourist revenues for the town.

The reverse has also been shown to be true. In Denmark, the government followed a process of reallocating quota to the larger scale fleet at the expense of the smaller scale sector. In many coastal communities with only a few boats on the beach, this loss of access was followed by the loss of the boats. This in turn led to the loss of local infrastructure as a result of a reduction in the numbers of tourists. This cascade effect can then result in the loss of local shops, a reduction in the local population and a threat to the local school – all from the original loss of a few seemingly unimportant fishing boats.

It is also a fact that fishermen are primary food producers and wealth creators. The vast majority of small scale fishers are indigenous to their local communities and carry within them the knowledge, skills and experience derived from decades of fishing activities. This is increasingly not the case for the large scale fleet that rely more and more on foreign labour. Whilst this labour may be cheaper and more plentiful than employing local crew, it is only the indigenous fishermen who can act as trustees and guardians of the wide range of knowledge and skills necessary to fish in coastal waters. It would be a tragedy of epic proportions and a stain on the character of an island nation if the small scale fleet was allowed to wither and die, together with the loss of the heritage, traditions and culture built up over centuries.

We would also take this opportunity to highlight the fact that fishermen are primary food producers, delivering, if given the opportunity, high value products rich in Omega 3 and a vital element in a

balanced diet. Support should therefore of course be provided specifically to those who are proven to be able to fish sustainably, with highly selective gears.

This aspect should also be considered in relation to the ever growing impact of climate change. It is vital that we maintain the resilience of coastal communities and the wider population in the face of both the serious threats and the possible opportunities that come from this issue. By supporting the Island Fisheries [Heritage Licenses] Bill, the Committee will be underpinning Ireland's ability to withstand the impacts of this phenomenon and where possible benefit from it.

As Executive Director of LIFE and formerly of the UK's organization in support of the small scale fleet therein, [the New Under Ten Fishermen's Association] and as current Chairman of the Coastal Producers Organisation [CPO] I have supported the creation and development of a specific Producer Organisation for the UK's small scale fleet since the beginning. This PO has recently been given official recognition by both the EU and the UK government and has already grown to be the largest PO by number in the UK. It seeks to achieve the same aims and aspirations for the UK's small scale [under ten metre] fleet as does the PO element within the Island Fisheries [Heritage Licenses] Bill.

The overall aims of the CPO are to be able to manage the quota pool for this sector, provide the opportunity for the members to determine their own futures through the effective and efficient management of quota, encourage and require the members to fish within the law and their quotas and to develop a recognized channel in support of a positive and practical interface between fishers and the national Administration. PO's have been recognized by the EU as the primary means of achieving these aims and it is fundamentally fair that the smaller scale fleet is also provided with such an opportunity. We see this development as a significant and positive route for the small scale sector to be able to work with their larger counterparts as well as with government and officials. It would seem somewhat discriminatory in the event that this avenue was barred for the small scale sector in particular as a result of their application countenanced within the Island Fisheries [Heritage Licenses] Bill being refused.

In conclusion, at heart the Island Fisheries [Heritage Licenses] Bill seeks to redress the historic unfairness in the way that the Irish islands small scale fleet have been treated over many years and who have seen their fishing opportunities, together with the myriad benefits that stem from them being eroded and removed through no fault of their own. It is in our view self evident that by supporting the Island Fisheries [Heritage Licenses] Bill, the Committee will at a stroke put in place the building blocks for the preservation of a way of life, in social, economic, cultural and environmental terms that is under massive threat from a variety of sources, almost entirely outside of the control of the communities in question.

With regard to the allocation of quota in particular, it is a simple choice, either providing riches for the few OR a decent and sustainable living for the many, and especially those in the outermost areas of Ireland where there are few alternative employment or economic opportunities.

Yours sincerely,

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