



BirdWatchIreland

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BIRDWATCH IRELAND'S SUBMISSION SUSTAINABILITY IMPACT ASSESSMENT OF FISHING OPPORTUNITIES FOR 2021

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BirdWatch Ireland's Submission on Fishing Opportunities 2021

This submission is on behalf of BirdWatch Ireland. We welcome the opportunity to provide input into Minister McConlogue's Sustainability Impact Assessment of fishing opportunities for 2021.

The EU has failed to fully implement the Common Fisheries Policy (CFP) and Ireland has contributed to that outcome. The Irish Government has repeatedly committed to the full implementation of the CFP. The positive environmental and socio-economic benefits of sustainable fisheries management remain within reach. To help decision makers address the remaining challenges, we recently published our own assessment and recommendations in the [Common Fisheries Policy 2020 – A Discarded Opportunity](#) report. We have also contributed to positions on 2021 fishing opportunities by the [Environmental Pillar](#) and the [North Wester Waters Advisory Council](#). We ask that all three documents are taken into consideration; the main recommendations of which are summarised here.

In view of the Government's declaration of a biodiversity and climate emergency it is appropriate that fisheries management adopts an ecosystem-based approach moving forward. The focus of Irish fisheries management must shift away from a myopic focus on short-term economic returns and instead should move towards a system that works to achieve the greatest social and environmental benefits and long-term economic sustainability. Practically this would mean following the best available scientific advice, prioritising the recovery of overfished stocks through stock recovery plans, technical measures, and spatial and temporal closures. This approach should be developed in tandem with the expansion of Ireland's network of Marine Protected Areas (MPAs). Win-win scenarios should be identified such as the incorporation of fish nursery grounds and important spawning habitats into MPAs. The economic benefits of rebuilding fish stocks will accrue even in the short-term due to the increased profitability of greater catches and the reduced costs of catching more abundant stocks. The sooner we fully implement the CFP and transition to an ecosystem-based approach to fisheries management the sooner we can enjoy the economic benefits.

As an island nation we have an unprecedented opportunity to grow our blue economy, creating more jobs in coastal communities while delivering a healthy marine environment that is resilient to the mounting pressures of biodiversity loss, climate change and pollution. Decisive action must now be taken by EU and Irish leaders to ensure that the promise of the Common Fisheries Policy is fulfilled without further delay. To support the Minister, we would like to highlight the following overarching and stock specific recommendations.

**Fintan Kelly,
Policy Officer,
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A handwritten signature in black ink, appearing to read 'Fintan Kelly', written over a horizontal line.



BirdWatchIreland Recommendations

1. Set sustainable fishing limits

- ✓ In 2020 TACs should be set not exceeding ICES advice on the basis of the ICES MSY approach or, in the absence of defined FMSY reference points, not exceeding the ICES Precautionary Approach advice.
- ✓ ICES catch advice for stocks subject to the MSY and precautionary approaches should be treated as an upper limit for fishing mortality rather than a target.
- ✓ The Ministers SIA should include an assessment of all stocks and non-commercial habitats and species which are impacted by commercial fishing.

1.1 Mixed Fisheries Advice & the use of F ranges

- ✓ We advocate that the most sustainable mixed fisheries scenarios from the perspective of the most limiting bycatch stocks are adopted by the Council.
- ✓ Supporting measures aimed at minimizing the misalignment between activity and stock shares for the fleets, such as changes in gear selectivity, spatiotemporal management measures, or reallocation of stock shares, should also be considered.

1.2 Bycatch TACs

- ✓ Stock recovery plans should be developed to effectively reduce bycatches and set the relevant stocks on a pathway to recovery above levels capable of producing MSY
- ✓ All of the fisheries which catch the relevant stocks should be subject to robust monitoring and control including full catch documentation in 2021.

2. Improve Data Collection

- ✓ Managers should improve data collection to inform the science, fisheries management, and ensure compliance with the CFP.
- ✓ Member States should support ICES in the development of MSY proxy reference points for data deficient stocks.

3. Rebuild Depleted Stocks

- ✓ Stock recovery plans should be developed to effectively reduce fishing mortality, putting overfished stocks on a pathway to recovery above levels capable of producing MSY.
- ✓ Managers should follow the best available advice from ICES and STECF on fisheries management. This should include following mixed fisheries advice scenarios that ensure the sustainable management of all stocks in a mixed fishery.
- ✓ Managers should implement measures aimed at minimizing the misalignment between fishing activity and stock shares for the fleets, such as changes in gear selectivity, spatiotemporal management measures, or reallocation of stock shares, should also be implemented.



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4. Fully Implement the Landing Obligation

- ✓ Managers should invest in cost-effective at-sea monitoring and control systems such as REM, to ensure the full implementation of the Landing Obligation, delivering benefits such as transparency, improved data collection and enhanced compliance.
- ✓ All fisheries which are deemed to be at high risk of discarding should be subject to robust monitoring and control, including full catch documentation in 2020.

5. NWWAC Fishing Opportunities Advice 2021

- ✓ The North Western Waters Advisory Councils submission to the European Commission on Fishing Opportunities for 2021 adopted some significant consensus positions between fishing industry and environmental NGO's that should be taken into consideration. This covered positions on the Landing Obligation, ecosystem-based fisheries management, mixed fisheries advice, quality assurance of the scientific assessment and bycatch TACs.

6. Covid 19 – a sustainable recovery

- ✓ Financial support should focus on measures such as temporary tie-up schemes which have the potential to provide environmental co-benefits, while also not undermining the ongoing recovery of seafood markets.
- ✓ Any use of inter-annual flexibility should be made on the basis of the best available scientific advice and should be consistent with the existing legal framework and compatible with the objectives of the CFP.

7. Stock Specific Recommendations

	ICES stock	TAC 2020	2021 ICES Advice	TAC Change %	Env Pillar Advice s	Comments
West of Scotland	Cod 6a	1,279	0	-100	0	Follow ICES MSY approach. Stop using a bycatch TAC which is resulting in an increase in fishing mortality. Recovery plan required to reduce bycatch and boost recruitment. Implement full catch documentation / REM Relevant TACs in the mixed fisheries should be precautionary
	Cod 6b	74	14	-81	14	Follow ICES PA approach (ICES Cat-6). Improve data collection. Recovery plan required to reduce bycatch and boost recruitment. Implement full catch documentation / REM Relevant TACs in the mixed fisheries should be precautionary
	Haddock 3a,4,6a*	35,653	69,280	72	69,280	
		3,973				
		707				
	Haddock 6b	10,472	6,239	-40	6,239	
	Whiting 6a	937	0	-100	0	Follow ICES PA approach (ICES Cat-5). Recovery plan required to reduce bycatch and boost recruitment. Implement full catch documentation / REM Improve data collection. Relevant TACs in the mixed fisheries should be precautionary
	Plaice 6	658	No advice	NA	No advice	
	Sole 6	57	No advice	NA	No advice	
	Anglerfish 3a,4,6*	14,085	17,645	-20	17,645	
		7,971				
	Megrim 4,6a	5,901	7,300	-11	7,300	
Megrim 6b	2,922	512	-11	512		
Saithe 4,6,3a*	8,280	65,687	-26	65,687		
	79,813					
	880					



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Irish Sea	Cod 7a	257	93	-64	93	Follow ICES PA approach (ICES Cat-3). Improve data collection. Recovery plan required to reduce bycatch and boost recruitment. Implement full catch documentation / REM Relevant TACs in the mixed fisheries should be precautionary
	Haddock 7a	3,156	3,371	7	3,371	
	Whiting 7a	721	0	-100	0	Follow ICES MSY approach. Stop using a bycatch TAC which is resulting in an increase in fishing mortality. Recovery plan required to reduce bycatch and boost recruitment. Implement full catch documentation / REM Ensure the other target stocks have TACs and management measure that are consistent with the recovery of Whiting 7a.
	Plaice 7a	2,790	2,846	2	2,846	
	Sole 7a	457	768	68	768	The fishery has gone from a bycatch of Ray to actively targeting it over the space of one year. F MSY should be an upper limit.
Celtic Sea	Cod 7e-k	805	0	-100	0	Follow ICES MSY approach. Stop using a bycatch TAC which is resulting in an increase in fishing mortality. Recovery plan required to reduce bycatch and boost recruitment. Implement full catch documentation / REM Relevant TACs in the mixed fisheries should be precautionary
	Haddock 7b-k	10,859	18,382	69	18,382	Take Celtic Sea mixed fisheries consideration into account - ensuring the TAC for TAC of Cod 7e-k is inline with the CFP obligations.
	Whiting 7bk	10,863	5,261	-12	5,261	Take Celtic Sea mixed fisheries consideration into account - ensuring the TAC for TAC of Cod 7e-k is inline with the CFP obligations.
	Whiting 7d		4,311		4,311	
	Plaice 7bc	74	19	-74	19	Follow ICES PA approach (ICES Cat-6). Improve data collection.
	Plaice 7fg	2,003	1,911	-5	1,911	
	Plaice 7hjk	67	0	-100	0	Follow ICES Precautionary approach. Bycatch reduction plan required. Implement full catch documentation / REM Relevant TACs in the mixed fisheries should be precautionary
	Sole 7bc	42	19	-55	19	Follow ICES PA approach (ICES Cat-6). Improve data collection.
	Sole 7fg	1,652	1,413	-14	1,413	
	Sole 7hjk	329	213	-35	213	Follow ICES PA approach (ICES Cat-3). Improve data collection.
	Hake Northern*	3,403	98,657	-13	98,657	Follow ICES MSY approach.
		3,940				
		63,325				
		42,235				
	Black anglerfish 7,8	35,299	15,551	13	15,551	
	White anglerfish 7,8	9,008	34,579	13	34,579	
	Megrim 7b-k,8abde	18,732	19,184	NA	19,184	Two separate stocks which should be managed using single-species TACs. Follow the UNFSA Precautionary Approach to fisheries management. Improve data collection
Pollack 6,7*	238	3,360	-73	3,360	Follow ICES PA approach (ICES Cat-4). Improve data collection.	
	12,163					
Saithe 7-10	3,176	No advice	NA	No advice		
Nephrops	Nephrops 6 no FU	15,899	-6	209		
	Nephrops FU11			3,852		
	Nephrops FU12			5,772		
	Nephrops FU13			5,132		
	Nephrops 7 no FU	16,815	7	150	Ensure that the TAC and management of Nephrops in FU 7 is consistent with the recovery of Whiting 7a and Cod 7a	
	Nephrops FU14			991		
	Nephrops FU15			9,919		
	Nephrops FU16			3,290		
	Nephrops FU17			436		
	Nephrops FU19			439		
	Nephrops FU20-21			1,430		
Nephrops FU22	1,371					
Albacore tuna NEA	33,600	37,801	13	37,801		
Blue whiting NEA*	2,500	929,292	NA	929,292	The fishery is underpinned by the 2014 good yr class but this is passing out of the fishery. MSY must be an upper limit.	
	44,757					
Boarfish 6,7,8	19,152	19,152	0	19,152		
Herring 1,2*	385,008	651,033	24	651,033	Concern about decline in SSB and increase in F. MSY must be an upper limit.	
	8,954					
Herring 6a,7bc*	385,008	0	-100	0	Recovery plan required. Enhanced at-sea monitoring and data collection. Ensure a monitoring TAC is consistent with the short-term rebuilding of the stock.	
	1,360					
Herring 7aN	3,480					
Herring 7aS,7g-k	8,064	7,341	-9	7,341	Recovery plan required. Enhanced at-sea monitoring and data collection. Ensure a monitoring TAC is consistent with the short-term rebuilding of the stock.	
Herring 7aS,7g-k	869	0	-100	0	Recovery plan required. Enhanced at-sea monitoring and data collection. Ensure a monitoring TAC is consistent with the short-term rebuilding of the stock.	
Horse mackerel NS	13,763	14,014	2	14,014		
Horse mackerel W*	11,179	81,376	-1	81,376	The fishery is heavily dependent on 1982 yr class. MSY must be an upper limit.	
	70,617					
Ling NEA*	20,396	18,516	-29	18,516	Follow ICES PA approach (ICES Cat-3). Improve data collection.	
	4,237					
	1,350					
Mackerel NEA	922,064	852,284	-8	852,284	Recruitment down in 2020. MSY must be an upper limit. A stable sharing arrangement must be established.	
Spurdog/ dogfish NEA	0	0	0	0	A threatened and declining species according to OSPAR. Landing of bycatch should be part of a management plan, including close monitoring of the stock and relevant fisheries. Work with the industry to promote real-time reporting and real-time spatial closures to avoid congregations.	