

The Irish Sea is in Crisis... (Still).

The Irish Sea Fishery has been in a state of crisis for many years.

What was once a rich mixed stock fishery has declined to a fishery based on nephrops, with very poor stocks of demersal fish. The UN FAO has warned against reliance on a single stock in any fishery for many years. Internationally the Irish Sea is classified as a “Dead Zone”. Jellyfish blooms are on the increase and new species are showing up.

At least six years ago, the then NWWRAC Irish Sea Working Group (WG4) Chair, Lorcan O’Cinnéide said we must act on this now, or we would still be talking about this in five years time. So what have we actually done?

The NWWRAC has produced a number of proposals for management plans, most based on Cod management, but more recently agreed to adapt the Celtic Sea multi-species management plan to fit the Irish Sea model. These are two totally different fisheries, not only with regards to stocks but the seabed and fishing methods are totally different.

These plans agree that data deficiencies are one of the most crucial elements, which need to be addressed, but not how to do this. The grand sounding proposal on rebooting Cod Management in the Areas VIa and VIIa “Breaking the cycle of decline” of 2012, suggested that fishermen were afraid to report their discards because of possible negative consequences on their fishing activities. This paper advocated a move towards a form of Fully Documented Fisheries as part of a multi-layered approach.

Since the formation of the RACs it has been recognized that there is a need for a reduction in discards. Indeed ICES in its briefing during the NWWRAC meetings in July 2013 stated that it believed that the worst offenders are the TR2 fleet, i.e. those targeting *nephrops*, which is the dominant fishery in the Irish Sea.

During the past eight years the industry has not denied this, and has recommended an improvement in selectivity to reduce bycatch and discards. This is agreed by all, and will be of great benefit not only to the industry but also to the entire ecosystem. However the industry insists that with minor limited exceptions, this increase in selectivity should be achieved by the use of TCMs. Over the past few years we have seen the use of several new TCMs. However stocks continue to decline and this year ICES has recommended a zero or lowest possible catch for three stocks in the Irish Sea, Cod, Whiting and Sole.

Unfortunately we are still talking and juvenile fish are being killed and discarded.

We would like to propose that the time is long overdue to actually act to reduce this mortality of juvenile fish.

At the first formal meeting of the NWWRAC Irish Sea Working Group (WG4) in Glasgow in 2006, the Irish Seal Sanctuary (ISS) proposed that the industry protect juvenile fish from trawlers by excluding trawlers from nursery areas. While the ISS realises that the nursery areas for many species extend well out into the Irish Sea the most valuable areas are the inshore waters. The ISS would once again like to propose a trawling ban in waters out to six nautical miles.

For an example of the effectiveness of this strategy check the reasons for the collapse in the once abundant mixed stock Clyde Fishery. When trawlers were allowed within three nautical miles of the coastline as recently as 1984, the fishery declined and within twenty years was reduced to a prawn and scallop fishery similar to the Irish Sea as it is now.

We realise that the NWWRAC and the Commission are not responsible for Member States' waters out to six nautical miles but the NWWRAC is the only forum available where all stakeholders can address each other on management issues. A proposal such as this would require all stakeholders to back each other and the concerned member States agree to work together and agree that the so-called "grandfathers rights" be suspended so no trawling takes place within at least three nautical miles of the coastline. Most of the larger boats will say that they do not operate within six miles of the coast. But it is a common practice to move inshore at night time to target prawns. Seasonally, some large trawlers move inshore to target Sprats destined for the fishmeal market. I ask the industry to consider if these Sprats would be better for the future of the industry if they ended up in the feed of Cod and Haddock instead of chickens and pigs.

This proposal is not offered as an alternative to the use of technical measures (TCMs), but while working to find one that works to protect juvenile fish the ISS believes action should be taken now to protect these future stocks. By drawing a line in the sand, enforcement should be easier but we hope that the industry will buy into this and regulate itself.

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