



KFO Responds to Commission's Proposals on Reform of the Common Fisheries Policy

The process of reforming the CFP has reached a critical phase with real proposals on the table. Now, more than ever, industry must be aware and proactive in responding to these proposals, as the outcome will mould the lives and futures of fishing communities in Ireland for the next decade or more. KFO has engaged, whenever possible, with industry colleagues here in Ireland, in Europe, with the various development and state agencies, the EU Commission and European Parliament, to ensure the voice of fishermen is heard at every opportunity throughout this process. While many issues have been dealt with, there still remains areas of great concern which must be addressed over the coming months; two extremely contentious proposals, ITQs and Discards, pose particular problems and are dealt with in separate articles (page two and three.)

Hague Agreement

Among those unresolved issues, is that of the Hague Resolution of 1976. KFO repeats its previous calls for the full implementation of the Hague Agreement which endorses Ireland's right to continued development of its fishery resources and which is a keystone to future growth of the Irish industry.

Regionalisation

KFO is a strong advocate for regionalised and decentralised policy, but what was promised has not been delivered by these proposals. This vital development of the CFP has been reduced to the implementation of multi-annual plans, conservation measures and technical measures by individual Member States whereas real regionalisation should consist of principles and objectives being set by the Fisheries Council and the European Parliament but implemented by Decentralised Fisheries Management Boards. Such Boards would constitute a regional entity with real devolved powers informed by real time input from the stakeholders including industry (which must play a significant role), scientific bodies and RACs.

Relative Stability, TACs & Quotas

From an Irish industry perspective, the percentage share that Ireland has in some of the key whitefish species is inadequate. Unfortunately, history cannot be rewritten and the basic quota remains as established in 1983. The challenge is to find other ways and means to use the existing Relative Stability in a more imaginative way to tip the balance in Ireland's favour. Utilising Fishery Management Areas, permanent quota swaps, enhancing The Hague Resolution, providing incentives such as additional quota in return for more over- and above-requirement for discards and TCMs are all tools that could make a huge contribution to the net result. In addition, such

strategies would also benefit neighbouring coastal states, which would greatly enhance Ireland's position vis-à-vis other European fishing nations.

The Irish Box

The Irish Box was established in 1986 and redrawn in 2003 and is now referred to as the Biologically Sensitive Area (BSA). KFO is dismayed to see there is nothing in the current regulatory proposals to indicate the BSA will be maintained though the area around the Azores, Madeira and the Canary Islands will be subject to a protected zone. **It is essential that the status of the existing Irish Box/BSA is maintained in its current form.**

Objectives

General objectives should be general in nature; KFO suggests that the general objective should be to achieve ecological, social and economic sustainability. In these proposals, several quite specific objectives have been inappropriately included under this heading. Aims such as achieving MSY and the application of precise management techniques are quite specific actions and need to be categorised as such. (See article page three, EU Project to Maximise Yield of Fisheries Gets Go-Ahead.)

Scientific Advice & Data Requirements

KFO is disappointed not to find any provisions in the Commission's proposal for addressing the existing data-poor situation or for the lack of potential to handle the data. New approved approaches are urgently needed for stock assessment methods. A consolidated analysis of technical, economic and social data remains necessary to fine-tune fisheries policies. KFO would advocate yet again that the science "base" for fisheries management should incorporate much more of the information available from fishermen.

Effort

KFO does not support effort restrictions, such as limits on Days-at-Sea, as an effective management strategy. The existing effort limitations (Days-at-Sea) for cod stocks in the Irish Sea and the North West are not delivering on the recovery of these stocks. The only effect these limitations are having is to prevent the prosecution of sustainable stocks such as Nephrops, as was evident in the Irish Sea at the end of 2011. Rather than effort limitations, KFO considers that other more effective ways and means need to be adopted, for example, the cod closure off the Donegal coast for six months per year to protect juvenile cod.

Control and Enforcement

KFO is supportive of the proposal to enhance a culture of compliance, but under the condition that these (often far too detailed) rules will encourage compliance; rules should be tough but sensible.

Although the proposal clearly takes into account the existing control and IUU regulations and their implementation rules, KFO is disappointed that there is no mention of a level playing field objective in the CFP proposal. Taking into account the objective to increase the self-supply in the European Union, an important item to mention in a control chapter of a policy is a provision for trade sanctions when irresponsible behaviour of third countries is established. In this respect, the IUU regulation should be amended taking this into account when confirmed within the new CFP.

External Policy

The external policy in the proposals only covers the Southern Fishing Agreements and makes no reference whatsoever to the Northern Fishing Agreements such as those with Norway, Iceland, the Faros and Greenland. The external policy should cover both Northern and Southern Agreements. The proposals for Southern Agreements are taking a completely new approach, which the KFO considers to be unworkable and will lead to virtually no Southern Agreements being concluded with these countries. In this scenario it will lead to external Community fleets putting additional pressure on Community waters.

Trade Measures

It is essential that the EU Commission makes provision in its proposals for the use of appropriate trade measures against those third countries that act irresponsibly and are putting well-managed stocks in jeopardy, as has happened with both Iceland and Faros, massively increasing their percentage share of the mackerel stocks. The recently issued proposal by the Commission on such trade measures is a good starting point; however, the CFP proposals must require that there is a general catch-all provision to cover any such stocks that are put in jeopardy by such actions.

The CFP is basically a food production system which depends on sound and sensible long-term exploitation of a natural resource; a robust, strategically sound CFP should reflect this with a simple and straight-forward policy, based on the common ground between the stakeholders to encourage increased compliance and less need for ever more detailed management. As with any proposals, "the devil is in the detail" and considerable discussion is still required between all parties. The KFO is ready and willing to participate in any such discussions when needed and is already actively engaged with FIF colleagues in discussions with Minister Coveney and his officials. Interpretation and common sense will be key factors in the success or failure of any reform of the CFP going forward, but it is essential that Ireland pursues the key areas identified in a united and coherent fashion.

Banning Discards is not the Answer

The catchphrase of the moment is “zero discards” and it is probably the single most referred-to proposal of the current reform of the CFP. Unfortunately, it is most used by those who really have little or no idea what constitutes “discards” which come in many guises and include juvenile, over quota, mixed fisheries, unwanted species, high grading and slipping discards.

The Commission’s simplistic approach is:

- land all catches which are included in TAC & Quota Stocks;
- work to a three-year timeframe beginning with pelagic species; and
- use mandatory Transferable Fishing Concessions (TFCs) to solve the problem.

Landing all these types, sizes, species etc., would do nothing to solve the problem; in fact, it would create enormous logistical and financial problems for those whose responsibility it would become to dispose of them. It would create unimaginable problems for Control and Enforcement Authorities and could possibly destroy markets and other infrastructure which might never recover.

The EU Commission proposes that POs be responsible for the handling of all unwanted catches from their members i.e. the discards where there is an obligation to land. Aside from the enormous financial and logistical burden this would impose on the average PO, there is no allowance made for handling fish discarded by non-PO member vessels. KFO and fellow POs do not agree with the obligation to land unwanted catch as they believe there are more effective alternative solutions:

- **avoidance;**
- **minimisation; and**
- **implementation by fishermen given suitable incentives.**



Square mesh panel inserted into a conventional diamond mesh cod-end (Crown Copyright courtesy Marine Scotland)

KFO re-iterates that the focus should be on the avoidance of unwanted by-catch and the overall minimisation of discards by the adoption of a combination of more selective gear, such as the SMP illustrated above, and temporal/spatial closures, for example, the Celtic Sea Cod Box Closure. Ireland has been to the forefront in applying such measures with excellent results. Enforcing rapid measures rarely leads to positive results and therefore KFO recommends focusing on agreeing a gradual reduction in discards. Viable financial incentives for fishermen to actively work on this aim must be included.

Commission Proposes €5.52 Billion for new European Maritime and Fisheries Fund (EMFF) Over Seven Years

To answer the question “Is there enough funding for fishing activity in the new EMFF”? KFO would respond with a resounding “NO”. And would go on to illustrate this response with a very local and pertinent example: the Killybegs Impact Assessment Study.

Killybegs was one of 24 case studies carried out in five fisheries-dependent areas on the socio-economic impact of change on the entire region. In this region there is an annual turnover of €250 million; 98 per cent of this turnover has been generated by private sector investment of €300 million between 2000-10. This is a clear demonstration of a Seafood Sector Growth Area where money invested brings a return in increased employment, positive sustainability, increased competitiveness and enhanced environmental protection. Funding at this level is not a subsidy or a hand-out; it is a value-for-money investment. Yet, when we see the breakdown of finances allocated under the EMFF, every sector, except this type of activity, will get an increase in resources in the 2014-20 period compared to 2007-13.

The EMFF is an essential component of the reformed CFP, but it must take on the funding of several additional areas of fishing activity, the most important being:

- **Targeted Scraping (Decommissioning)**
 - The EU Commission believes the money spent to date on decommissioning has been wasted but this is due to a basically flawed framework. Targeted decommissioning would achieve a high percentage of the targets set by the reformed CFP and avoid many of the unworkable aspirations such as a total ban on discarding and TFCs.
- **Production and market plans and storage aid**
 - It is proposed that POs take on greater responsibility going forward but given the wide range of level, type and size of POs in Europe there must be financial backup if this is to be successful. The proposal to phase out storage aid must be refuted and carryover aid must be kept as an option.
- **Regionalisation and Advisory Councils**
 - There is no funding for real decentralisation. The RACs could play a key role in this process but must be successful; in addition, a Markets Advisory Council must be established urgently.
- **Data collection and scientific, economic and social advice**
 - Many of the problems experienced by the fishing industry and its managers are due to lack of data. Good advice and good decision making is not possible without relevant information which can only be gained through investment in research.
- **Fisheries Local Action Groups (FLAGS)**
 - This is a good initiative but the objectives must be clearly linked to improved sustainable fisheries employment. The establishment of FLAGS needs to be more carefully defined and simple rules applied.

The basic fund of €5.52 billion allocated for the EMFF is not sufficient and must be increased. In particular, Production and Marketing Plans must be included while the €358 million allowed for data collection needs to be increased. It has been pointed out how necessary carryover and withdrawal aid is, especially to small scale operators, so the allotted €45 million must be significantly increased to maintain this safety net.

Commission Proposes Major Changes to the Common Organisation of the Markets in Fishery and Aquaculture Products

A Common Market Organisation (CMO) for fisheries and aquaculture products has always been a supporting structure for the CFP, and as each CFP has been revised, so too has its associated CMO. In the period of evaluation prior to the launch of the CFP reform process, the CMO was also scrutinised and several problem areas were identified. It was felt the existing CMO did not contribute to sustainable production, was unable to react to market fluctuations, was not competitive in the increasingly globalised market and was also overly complex. The proposals under current consideration, significantly strengthens the role of Producer Organisations (POs) and relies hugely on transferring much of the burden of fisheries management to the POs.

These welcome changes significantly increase the workload for POs such as the KFO and will not become a reality unless this new onerous role is adequately funded (see article above right, Commission Proposes €5.5 Billion for new European Maritime and Fisheries Fund Over Seven Years.) It is important to note that the POs operate at a

wide range of levels and allowance must be made for all to reach the level of professionalism which would be required to carry out this role; also, POs must be allowed to continue at different speeds and levels catering to their own members needs while maintaining existing support tools, particularly the safety net in term of prices the intervention mechanism provides.

The intervention mechanism, with the system of withdrawal prices, has played a role both for the catching sector and land-based downstream activities. Many times in the past, small scale mixed fisheries and coastal fishermen which are particularly vulnerable to falling prices, have availed of the intervention system. It is therefore important to maintain the safety-net of the intervention system particularly the carry-over aid which the Commission proposes to phase-out over a number of years. It should be noted that the actual financial cost of this intervention system is low compared to other areas of EU support, but can be highly significant at maintaining reasonable prices for fishermen.

The KFO is proposing that a new Market Advisory Council similar to the current Regional Advisory Councils be established, as the Commission is intent on scrapping the Advisory Committee for Fisheries and Aquaculture.

POs see their role as providing the best possible market conditions for their members but, due to the unique nature of wild capture fisheries, their actions are often misinterpreted as being “anti-competitive.” The proposed COM must adequately address this problem and create a workable situation for POs whereby they can achieve the objectives of both their members and the CMO, and yet not be in breach of Competition Law in any Member State.

There are two areas within the proposals which KFO would completely reject, namely the implementation of Transferable Fishing Concessions (ITQs) and the management of discards. (See articles above right and left, KFO Rejects Transferable Fishing Concessions and Banning Discards is not the Answer.)

KFO Rejects Transferable Fishing Concessions

The proposal to introduce mandatory Transferable Fishing Concessions (TFCs) is a major issue for the Irish industry as it currently stands. KFO is convinced such a proposal would lead to the demise of the entire Irish fishing industry. In practice TFCs equal Individual Transferable Quotas (ITQ) plus Individual Transferable Effort (ITE). Appropriate legal safeguards cannot be guaranteed, as has been shown in the European Court of Justice Factortame Cases rulings. The application of economic link criteria has proved worthless in trying to stop the amalgamation of quotas. In such a scenario, it is inevitable that over a short period of time, Irish persons or companies will no longer own the Irish fishing industry. This in turn will lead to little or no landings into Irish ports with the obvious consequences for onshore operations and employment. Currently where a Member State (MS) has its own system of ITQs there has been a significant concentration of available quota by conglomerate-style entities and companies and the evidence, such as the UK Department of Environment, Food and Rural Affairs review would indicate, there is very little economic benefit to the host MS from foreign-owned vessels.

The mandatory nature of such proposals must be rejected and the Principle of Subsidiarity must continue to apply within Member States i.e. individual MS decide the most appropriate method of quota allocation.

EU Project to Maximise Yield of Fisheries Gets Go-Ahead

The current proposals from the EU Commission to reform the CFP include, "*The European Parliament and the Council, acting under the ordinary legislative procedure, shall adopt as a priority, multiannual plans to maintain or restore fish stocks above levels capable of producing maximum sustainable yield.*"

This very specific proposal stems from a commitment made by the EU in 2002, known as the Johannesburg Declaration, to attain maximum sustainable yield (MSY) by 2015. MSY, which is the amount of fish which can be harvested each year without jeopardising the sustainability of the stock, is a worthy aspiration but difficult to attain and its application in mixed fisheries will not be straightforward. It should also be noted that the Johannesburg Declaration contained the caveat "where possible" which is very significant in the context of MSY and fisheries.

In response to fears and misgivings raised by a wide range of stakeholders, the EU is funding the major research project "MYFISH" to the tune of €5 million with input from more than 30 partners whose backgrounds include research institutes -- both fisheries science and socio-economic -- development agencies, specialists in knowledge transfer and, very importantly, fishing. Naturally, many of the partners come to this project with very different backgrounds and perceptions of MSY which, in itself, is a challenge. KFO, along with our Irish colleagues in the Marine Institute and AquaTT, is very pleased to be a partner in this project to

ensure the interests and contribution of the Irish fishing industry is recognised and included in this important work.

MYFISH commenced officially on March 1, 2012 and will run for 48 months. Starting with an intensive seminar in Vigo, Spain, this April, where the Work Programme will be launched, the partners will commence a lengthy process to provide definitions of MSY variants, evaluations of the effect and desirability of aiming for these variants and an operational framework for their implementation. The project will cover single and mixed fisheries for pelagic and demersal species in European regions ranging from the North Sea to the Mediterranean and will draw on the experience of leading experts in fisheries management in Canada, the US and New Zealand.

MYFISH aims to provide a workable compromise which will satisfy the commitment to achieving MSY for all fisheries going forward but at the same time recognising the inevitable trade-off at particular times and in particular areas. The project seeks to realise MSY as a "constrained optimisation" by maximising the relevant yield measure while at the same time respecting the environmental, economic and social constraints. Results will be made available throughout the life of the project and there will be ongoing cooperation with stakeholders to ensure their acceptance and uptake of results. KFO will make all relevant information available to members through the usual channels -- sectoral meetings, the KFO Newsletter and the KFO website.

Galway Seminar Catalyst to Establishing Seal Group

Seal predation has been a serious issue for Irish fishermen for decades but for the first time the problem has been looked at in a rational, non-emotive and business-like fashion. The Seal Workshop organised by the Irish Fisheries Science Research Partnership at the Marine Institute, Oranmore, Co Galway on September 2 last provided a forum where over 50 stakeholders from the fishing industry, the Marine Institute, BIM, environmental NGOs, the Irish Seal Sanctuary, the National Parks and Wildlife Services, Inland Fisheries Ireland, Swedish Board of Fisheries and University College Cork could finally put "all the cards on the table".

The objective of the Seal workshop was to increase understanding of the role of seals in the Irish marine ecosystem, identify key issues, gaps in our knowledge and explore appropriate management for seals. The Workshop consisted of a series of short presentations, followed by questions and discussion. The format was informal, allowed plenty of time for dialogue and included a panel of three inshore fishermen with first-hand experience of seal depredation. The question posed by these fishermen was "Who will survive -- the seals or the people?"

Attempts to assess the real effect of seal activity in Scottish cod fisheries have highlighted the lack of data on seal diet. Likewise, rational debate of the seal problem in Ireland has been hampered by lack of accurate population figures. However, this is currently being remedied with on-going

studies in UCC, and by BIM. A seal survey has identified the western seaboard as the main focus of seal populations and this data will be updated in 2013. Concurrent studies should produce useful information on dietary habits and factual data on fish consumption which will facilitate future debate.

Paul Connolly, Marine Institute, summed up the Workshop. He spoke for the majority when he described the event as important and marked the end of the communications failure between the stakeholders. Current research in Ireland is embryonic but is ongoing. The most important outcome of this Workshop is the realisation by all parties that we are not really that far apart. **Paul Connolly called for a "statement of intent" to carry on the work begun at this Workshop.** There was agreement that a Seal Group, drawn from the Workshop participants, would be set up to develop a "roadmap" for future collaboration and coordination.

The inaugural meeting of the Seal Group was held in December. The general conclusions of the meeting were:

- There are important interactions between seals and commercial fisheries. This is significant both from the fishery perspective where seals are competing directly or indirectly with fishing, and from conservation perspective, where seals are being taken as by-catch in fishing nets.
- There is insufficient information available at present to determine the degree of either type of

interaction; further research and study is required.

• Similar initiatives in the past (1991) were not successful but there have been considerable changes since that time. Seal populations may have increased, fishing fleets have changed and in some sectors decreased in number. The policy climate has changed considerably, with the introduction of the Marine Strategy Framework Directive, and other EU initiatives.

The group discussed a range of approaches in terms of research and study that could be carried out by all parties in collaboration or singly and recommended the following:

- a review of seal management internationally;
- exploration and quantification of the resource competition between seals and fishers (biological interactions);
- exploration and quantification of the resource competition at the gear (depredation of fish from nets);
- collation of fishing effort for inshore and especially small vessels operating static nets;
- investigation of "seal proof" gear and of seal deterrence devices;
- investigation of fishers approaches to minimising seal depredation (avoiding the interaction);
- study of the implications of changing fleet composition, particularly shift from large to many smaller vessels; and
- wide-scale quantification of seal by-catch by fishing métier and region.

Editorial

by Sean O'Donoghue

CHIEF EXECUTIVE, KFO



Most of this edition of the KFO newsletter is devoted to the Commission's proposals on the reform of the Common Fisheries Policy and the KFO response to those proposals (see articles pages one, two and three.) The debate on the Commission's CFP proposals has started in earnest with several public hearings arranged by the European Parliament (EP) and detailed discussions taking place now and over the next number of months at the Fisheries Committee of the EP. The Danish presidency has arranged that the CFP proposals will be discussed at four consecutive monthly Council meetings starting in March.

There are four main CFP reform documents under discussion, namely the basic CFP regulation; the Common Organisation of the Markets (COM); External Dimension, and European Maritime and Fisheries Fund (EMFF). The Commission's deadline of having a new CFP policy agreed and in place by January 1, 2013 is not a realistic timeframe and it is now more than likely that it will be under the Irish Presidency in the first half of next year that new policy will be agreed with a probable start date of January 1, 2014. From an Irish industry perspective the big "ticket" issues are: mandatory individual transferable quotas; Hague preferences and additional quotas; the discards ban; lack of any regionalisation; improved scientific, economic and social advice, and a range of funding issues.

The KFO is very active on all these issues and has made a number of presentations at EP public hearings and in conjunction with FIF colleagues has had detailed discussions with Minister Coveney and his officials.

The final agreed outcome of a reformed CFP is of critical importance to the future sustainable development of the Irish industry. At this stage in the discussions it could go either way, positive or negative. It is incumbent on all those involved to continue to work together to ensure a positive outcome that will enable the Irish seafood sector to avail of the significant opportunity for the sustainable growth of the sector that can deliver much-needed economic activity in terms of employment and revenue to coastal peripheral fishing-dependant areas.

The Mackerel Coastal States negotiations finished without agreement in Reykjavik in mid-February. Even though the EU and Norway had offered a very generous, and in my view too high, 7 per cent and 8 per cent shares with some access to Iceland and Faros respectively, neither country showed any real intent to compromise. This offer was a very significant increase on their existing shares of 0.3 per cent for Iceland and 4.83 per cent for Faros.



Faros and Iceland have again set themselves in the region of 150,000 tonnes each autonomous, unjustified and irresponsible mackerel quotas for 2012. This represents 47 per cent of the scientifically recommended catch limit for 2012 as against a combined existing share of just over 5 per cent. This cannot be allowed to continue and the time has long passed for both the EU and Norway to take decisive action in the form of effective sanctions. A window of opportunity still exists to adopt these sanctions by the European Parliament and the Fisheries Council in advance of the mackerel fishery commencing in Faros and Iceland at the end of May/start of June. It is heartening to see that both Minister Coveney and Pat 'the Cope' Gallagher MEP are very active at the Fisheries Council and EP respectively on this critical issue for Ireland. Furthermore, the EU should not open the "Fisheries Chapter" in the accession negotiations with Iceland until it has adopted a responsible attitude towards the sustainable management of mackerel.

A further unacceptable development in the mackerel issue is the re-flagging of EU vessels under the Faroese flag. This occurred in 2011 and has again happened in 2012. This is totally unacceptable, as it is aiding and abetting the Faroese in pursuing an unrestrained mackerel fishery and putting the healthy mackerel stock in jeopardy. There is provision in the sanctions document under discussion at the EP and Fisheries Council to legally stop this practice. A satisfactory resolution of the mackerel issue for future years (2012 is not an issue from an Irish quota perspective) is a key priority for the KFO. Every avenue is being explored, both officially at EU and national level, and also at industry level with EU and Norwegian pelagic colleagues.

Important Dates April - June 2012

April 13	IMSARC	Cork
April 16	Industry/Science Partnership	Dublin
April 17	CFP proposals (FIF&DAFM)	Clonakilty
April 19	Blue Whiting Focus Group PRAC	Copenhagen
April 23	Monthly Whitefish Quota Management	Dublin
April 23-27	MYFISH Project	Vigo, Spain
April 24-26	Brussels Seafood Exhibition	Brussels
April 24	MSC Board with Pelagic Industry	Brussels
April 27	Fisheries Council	Luxembourg
April 30	SFPA	Dublin
May 14-16	Long-term Management Plans	Svalbard, Norway
May 15	Fisheries Council	Brussels
May 25	KFO AGM	Killybegs
May 29	MSO with FIF	Dublin
May 30	ACFA Working Group III Markets	Brussels
June 11-15	ICES Advice Drafting Group Celtic Sea	Brussels
June 18-19	Fisheries Council	Luxembourg
June 26	Extended Bureau EAPO	Brussels
June 27	Bureau Brussels ACFA	Brussels
June 28	Plenary ACFA	Brussels
June 28-30	Fish Ireland	Killybegs

The SFPA set March 1 as the date when all vessels over 24-metres operating in the Irish EEZ had to have a fully functioning electronic catch reporting system (ERS). The SFPA has indicated that they are satisfied that at this stage all vessels in the Irish waters, irrespective of nationality, have a fully functioning ERC system on-board. A major issue has arisen for the Irish vessels in communicating the catch data using the approved Satlink communication system. It is very difficult to understand why this situation should have arisen particularly as the industry was assured that the communication system had been fully tested. The SFPA must immediately rectify this situation otherwise the vessels will have no option but to revert back to the paper logbook. The additional costs that are being incurred by Irish vessels on a daily basis in transmitting the data must also be refunded. The SPFA has also set May 1 as the date when all vessels between 15- and 24-metres operating in the Irish EEZ must have a fully functioning ERS on board. This deadline now seems optimistic in light of the Satlink communications difficulties with the over 24-metres vessels.

Head Office: Killybegs Fishermen's Organisation Ltd.,
 Bruach na Mara, St. Catherine's Road, Killybegs, Co. Donegal.
 Tel: (074) 9731 089, (074) 9731 305, Fax: (074) 9731 577,
 Email: kfo@kfo.ie Website: www.kfo.ie
 Dublin Office Tel: (01) 825 8846, Fax: (01) 825 8847