Killybegs Fishermen's
ORGANISATION LTD.
KFO news
2017 December Issue 68

IRISH QUOTAS 2018

Council Outcome Mostly Positive But Dark Cloud of Brexit Looms Large

The Killybegs Fishermen's Organisation welcomes the outcome of the Council of Fisheries Ministers as generally positive, but reiterates the imperative to have fisheries and the wider trade negotiations inextricably linked in the phase two of Brexit talks.

The EU Commission issued a proposal for a Council Regulation on November 11 last detailing fishing opportunities for 2018 (COM(2017) 645). This document forms the basis of how the fishing industry will access fish stocks for the year 2018 and so, give or take some amendments such as those which followed on November 14 and 16 respectively, by the time the Fisheries Council takes place in mid-December Ireland has a fairly accurate picture of expectations for the coming year.

This year there were some significant reductions proposed for Ireland's key demersal species, particularly cod, haddock and whiting in the Celtic Sea and expected increases in Nephrops in ICES area VII and cod in the Irish Sea were not included in the proposal. Additionally, pelagic fleets were threatened with a huge cut to Celtic Sea herring. The outlook was even worse for the larger pelagic fisheries with known cuts in the region of 20 per cent for mackerel, and uncertainty around species such as blue whiting and Atlanto Scandia herring. The hard reality could translate into substantial job losses and more than €30 million lost to the Irish fishing industry. However, following long sessions of bargaining, Ireland came away with a substantially better deal than indicated in the original Commission proposals.

PELAGIC QUOTAS 2018

SPECIES	Ices Area	Quota (t) 2017	Quota (t) 2018	Diff. %
Mackerel [1]	VI, VII	86,426	69,141	-20%
H. Mackerel [2]	IIa, IVa, VI, VIIa-c, VIIe-k, VIIIa,b,e	21,153	25,625	21%
H. Mackerel [3]	IVb, IVc, and VIId	438	376	-14%
Blue Whiting [4]	I, II,III, IV,V, VI, VII, VIII a,b,d,e XII,XIV	45,547	47,451	4%
Herring [5]	I, II	3,731	2,512	-33%
Herring [6]	VIaN	630	630	0%
Herring [7]	VIaS, VIIbc	1,482	1,482	0%
Herring	VIIa	1,074	1,826	70%
Herring	VII ghjk	12,502	8,748	-30%
Tuna [8]	north.atl	2514	2845	13%
Argentines	III, IV	7	8	14%
Argentines	V, VI, VII	274	329	20%
Boar Fish	VI, VII,VIII	18,858	14,084	-25%
Total		**19,4636**	**17,5057**	**-10%**

Footnotes for 2018 Pelagic Quotas

1. 41,730 tonnes of the mackerel quota may be fished in EU waters IIa; EU & Norwegian waters of IVa during the periods from January 1 to February 15, 2018 and from September 1 to December 31, 2018.
   5,621 tonnes of the quota may be fished in Norwegian waters of IIa & 5,754 tonnes in Faroese waters.
2. 5 per cent of this horse mackerel quota fished in division IIa or IVa before June 30, 2018 may be accounted for as fished under the quota concerning the zone of Union waters of IVb, IVc and VIId.
   Catches of boarfish, whiting and mackerel may be counted against up to 5per cent of this horse mackerel quota, provided that not more than 9 per cent in total of this quota for horse mackerel is accounted for by these catches and by-catches of those species
3. Catches of boarfish, whiting and mackerel may be counted against up to 5 per cent of this horse mackerel quota, provided that not more than 9 per cent in total of this quota for horse mackerel is accounted for by these catches and by-catches of those species.
4. Within a total access blue whiting quota of 21,500 Ireland can fish 9.2 per cent of its quota in Faroese waters.
5. EU vessels have access to 25,487 herring tonnes in Norewgian waters north of 62° and the fishery zone around Jan Mayen. Ireland has accces to 355 tonnes herring II, Vb north of 62°N (Faroese waters)
6. It shall be prohibited to target any herring in the part of the ICES zones subject to this TAC that lies between 56°N and 57° 30'N with the exception of a six nautical miles measured from the baseline of the United Kingdom's territorial sea.
7. Reference is to the herring stock in VIa south of 56° 00' N and west of 07° 00' W.
8. Ireland has a maximum of 50 albacore tuna licences.

AREA VI WHITEFISH STOCKS

SPECIES	Ices Area	Quota 2017(t)	Quota 2018(t)	Diff.%
Cod [1]	VIa	0	0	0%
Cod	VIb	16	16	0%
Megrim	VI	736	704	-4%
Monkfish	VI	765	918	20%
Haddock [2]	Vb VIa	605	761	26%
Haddock	VIb XII XIV	411	428	4%
Whiting	VI	64	64	0%
Plaice	VI	261	261	0%
Pollock	VI	56	56	0%
Saithe	VI	427	429	0%
Sole	VI	46	46	0%
Nephrops	VI	222	164	-26%
Total		**3,609**	**3,847**	**7%**

Pelagic Quotas 2018

The outcome for the pelagic sector was mostly known in advance of the Council. The 20 per cent decrease in mackerel, our most important economic fishery, while disappointing was known for some time and was due to a combination of factors including the ICES mistake and changes in the assessment. Unlike last year the Commission proposed a roll over for the scientific monitoring TAC for North West herring, which helps to keep the sample collection effort on track. The reduction in Atlanto Scandia herring (-33 per cent) was again due to a mistake in the ICES scientific advice, while the reduced quota in Celtic Sea herring (-30 per cent) was in accordance with the management plan and proposed by the Pelagic Advisory Council.

On the positive side, there was a substantial increase for horse mackerel (+21 per cent), herring in Area VIIa (+70 per cent) and albacore tuna (+13 per cent). There was also a modest increase (+4 per cent) for blue whiting.

Whitefish Quotas 2018

The drastic cuts expected for demersal species, on which the Irish whitefish fleet depends, were not as severe as feared. The Areas concerned were largely VI and VII; in Area VI there was an overall gain of +7 per cent with the greatest gains being haddock (+26 per cent) and monkfish (+20 per cent); the majority of the species in this area did not change from 2016. Some of the increase was offset by a reduction in Nephrops (-26 per cent) even though Ireland has a very small quota in this area.

In Area VII there was an overall increase of +3 per cent. This fluctuated with a massive increase in cod Area VIIa (+372 per cent), haddock (+55 per cent), plaice (+53 per cent) and Nephrops (+15 per cent). Here also many species did not change from 2016 levels. The main drops in quota were for whiting (-19 per cent) and haddock in Area VII b-k (-11 per cent). Skates and Rays were increased (+15 per cent) with the usual conditions regarding reporting and fishing restrictions.

Deepwater Quotas 2018

Deepwater quotas are set biennially; 2018 is year two of this setting of quota. There is a steady decline in available quota for these stocks but Ireland does not have a direct interest in them and their value remains their availability for "swapping" regarding other species.

Finally, a word of thanks to Minister Creed and his team, BIM, the Marine Institute and to all the officials for their efforts before and during Council and for fully engaging with the industry in addressing our concerns.

AREA VII WHITEFISH STOCKS

SPECIES	Ices Area	Quota 2017(t)	Quota 2018 (t)	Diff. %
Cod	VIIa	97	458	372%
Cod	VII b-k	739	756	2%
Megrim [3]	VII	2,266	2,263	0%
Monkfish [4]	VII	2,540	2,547	0%
Haddock	VII b-k	1,722	1,532	-11%
Haddock	VIIa	898	1388	55%
Whiting	VIIa	46	46	0%
Whiting	VIIb-k	7646	6,180	-19%
Plaice	VIIa	768	1,172	53%
Plaice	VII bc	63	67	6%
Plaice	VII fg	199	203	2%
Plaice	VII hjk	56	56	0%
Pollock [5]	VII	927	927	0%
Saithe	VII	1,491	1,492	0%
Sole [6]	VIIa	17	17	0%
Sole	VII bc	36	36	0%
Sole	VII fg	26	29	12%
Sole	VII hjk	171	178	4%
Nephrops	VII	9,352	10,729	15%
Nephrops [7]	VII Functional Unit 16	1,124	992	-12%
Total		**29,060**	**30,076**	**3%**

AREA VI, VII AND OTHER WHITEFISH STOCKS

SPECIES	Ices Area	Quota 2017(t)	Quota 2018 (t)	Diff. %
Cod	I,II	344	345	0%
Hake [8]	VI, VII	3732	3464	-7%
Redfish	Int waters V, XII, XIV (Shallow)	0	0	0%
Redfish	International waters V, XII, XIV	0	0	0%
Ling	VI, VII, VIII, IX, X, XII, XIV	1008	1008	0%
Blue Ling	II,IV international waters	4	4	0%
Blue Ling	Vb,VI,VII	32	32	0%
Tusk	V, VI, VII	53	57	8%
Greenland Halibut	IIa, IV, VI	16	16	0%
Snow Crab	Greenland Waters	0	0	0%
Porbeagle	I, II, III, IV, V, IV, IVV, VIII, IX, X, XII, XIV	0	0	0%
Skate & Rays [9]	VIa, VIb, VIIa-c and VIIe-k	1100	1266	15%
Spur Dogs [10]	I, II, IIII, IV, V, IV, IVV, VIII, XII, XIV	53	53	0%
Basking Shark	EU Waters	0	0	0%
Total		**6,342**	**6,245**	**-2%**

Footnotes for 2018 Whitefish Quotas

1. Zero cod TAC with maximum 1.5 per cent cod retained on board.
2. Not more than 10 per cent of this haddock quota may be fished in IV; Union waters of IIa.
3. 5 per cent megrim quota may be used in area VIIIabde for by-catches in directed fisheries for sole.
4. 10 per cent monkfish in VII may be fished in area VIIIa,b,d,e.
5. Up to 2 per cent pollack may be fished in VIII a,b,d,e.
6. Sole area VIIa exclusively for by-catches. No directed fisheries are permitted under this quota.
7. Nephrops quota in the Porcupine Bank functional unit 16 is part of the VII nephrops quota. It is not additional.
   - Closure period one month May 1-31, 2018.
   - It is prohitied to have on board cod, megrims, anglerfish, haddock, whiting, hake, Norway lobster, plaice, pollack, saithe, skates and rays, common sole, tusk, blue ling, ling and spurdog.
8. No more than 374 tonnes of hake VI & VII may be fished in ICES area VIIIa,b,d,e.
9. Separate reporting of seven species of ray. Prohibits catches raja undulata. 5 per cent may be fished waters VIId.
   - Prohibits catches small-eyed ray (Raja microocellata) except in VIIf,g. When caught accidentally shall be released unharmed.
10. Spurdog shall not be targeted but there is an amount of 53 tonnes for a scientific fishery. When caught accidentally they must be released unharmed.

DEEPWATER STOCKS

SPECIES	Ices Area	Quota 2017 (t)	Quota 2018 (t)	% Diff
Black Scabbard	V, VI, VII, XII	84	74	-12%
Roundnose Grenadier	Vb, VI, VII	198	203	3%
Roundnose Grenadier	VIII, IX, X, XII, XIV	4	3	-25%
Orange Roughy	VI	0	0	0%
Orange Roughy	VII	0	0	0%
Orange Roughy	I, II, III, IV, V, VIII, IX, X, XI, XII, XIV	0	0	0%
Red Seabream	VI, VII, VIII	4	4	0%
Alfonsinos	I, II, III, IV, V, VI, VII, VIII, IX, X, XII, XIV	9	9	0%
Forkbeards	V, VI, VII	278	247	-11%
Deep Sea Sharks	V, VI, VII, IX	0	0	0%
Deep Sea Sharks	XII	0	0	0%
Total		**577**	**540**	**-6%**

Huge Progress Made on Herring Stock Identification Project

Significant developments have been made on the herring stock identification over the last year. After identifying a number of potential genetic differences between the 6aS/7bc and 6aN stocks in 2016 the project was extended for a further year with funding from the Irish, Scottish and Dutch industries. This allowed inclusion of the samples collected during the industry spawning surveys and also further refinement and optimisation of the genetic techniques. In the latest analysis a total of 2,256 herring collected from multiple sites across a number of years were genetically sequenced and preliminary results are proving extremely interesting.

The 6aN spawning fish collected north and northwest of Cape Wrath represent a different population to the spawning fish collected in 6aS in the Donegal Bay area. The Celtic Sea and Irish Sea also comprise distinct populations, though the Celtic Sea samples are more closely related to the 6aS samples than to the Irish Sea. No significant genetic population structure was detected between the 6aN and the North Sea spawning samples, which indicates a high level of mixing between these areas. Of particular interest was the analysis of a sample of pre-spawning herring caught west of the Hebrides during the Scottish-Dutch industry spawning survey. Results indicated that this was a mixed sample, which fits with the scientific and industry view that this area is a mixed feeding ground, and may have a large proportion of fish from the southerly stocks in it. Further analyses are ongoing to develop the method for splitting the mixed sample into its constituent parts. Preliminary results also confirmed temporal stability within the different spawning areas, which means that the patterns of population structure observed are robust across the years of sampling. This is essential if the genetic methods are to be employed on an annual basis for stock identification and monitoring. Efforts are also being made to secure additional samples from areas and times not already covered, including the north coast of Donegal and any spring spawning herring from across the whole area. This will ensure that a comprehensive baseline is available for the splitting of mixed samples and catches in the future.

These preliminary results were presented recently at the ICES Workshop on Stock Identification and allocation of catches of herring to stocks (WKSIDAC) at the Marine Institute in November and were well received. They support the use of these genetic methods, which were pioneered by KFO-supported research projects, in uncovering the true biological population structure in these herring stocks. Ultimately the aim is to ensure that this population structure is accounted for in data collection and subsequent stock assessment, which will enable the most appropriate stock divisions and management to be put in place.

There is still a large amount of work to be done before annual monitoring can be implemented, however the project recently received a very welcome boost. A joint application between University College Dublin, the Marine Institute and Marine Scotland Science was awarded three years funding from the EU to continue the herring project. This development is further indication that genetics are likely to play a large role in the future of fisheries science.

Irish Seafood now in the Global Marketplace

The Irish food industry has long been the envy of the world and has produced globally recognised brands which are by now household names. This did not happen by accident; there has been a strong network built up over many years between producers at farm level through processors, innovation at scientific and product development level, constant improvement and, very importantly, the extraordinarily effective marketing efforts of Bord Bia. Every sector within farm production in Ireland has benefitted from the phenomenal success of marketing Irish food globally. Bord Bia keeps its place in those critical global markets through its Origin Green label.

A landmark moment for the Irish fishing industry was when fish became seafood and could be included under the Bord Bia umbrella. Immediately, every fishing vessel was a food production unit; this created a certain aggravation initially when industry had to start thinking in terms of HACCP plans, hygiene, accountability and traceability but all those requirements were going to be essential in any case to comply with increased global and EU regulation. Not alone did Bord Bia provide instant access to its marketing expertise but there was an agency which had already developed the know-how to deal with the demands of a modern food supply chain.

However, it was not as simple as applying agricultural approaches to fishing. Bord Bia and Bord Iascaigh Mhara pooled their resources, expertise and experience to produce applications which are specific for seafood. This cross-fertilisation process is on-going and proving both challenging and productive for both parties.

The already established BIM Responsibly Sourced Seafood Standard has been expanded to meet Origin Green requirements, while Origin Green has also been adapted to accommodate the very different production systems encountered in the fishing industry. A very import area of common interest is the development and assurance of sustainability. While demand is increasing to source from Marine Stewardship Council (MSC) certified fisheries, external factors outside the industry's control can present challenges. One tool for addressing this issue is through Fishery Improvement Projects (FIPs). These types of forums have been set up by the Sustainable Fisheries Partnership (SFP), a business-focused NGO, to good effect in a number of countries and specific fisheries, precisely to help fisheries achieve sustainability criteria. From an Irish perspective, FIPs will be used as the vehicle to demonstrate a commitment to achieving sustainability, while continuing to ensure economic viability. BIM has already started this project and will initially focus on the nephrops, whitefish and crab fisheries throughout Ireland. Currently there are 47 seafood companies with full Origin Green accreditation; it is expected this number will increase significantly in the near future.

European Fisheries Alliance Calls for Protection of Fishing Communities

In October, the members of the European Fisheries Alliance (EUFA) met in the historic city of Santiago de Compostela; the meeting centred around the consequences for European coastal and fishing communities post-Brexit. The EUFA members, including KFO, called on the governments, the European Council and the European Parliament to make fisheries a priority in the next stage of Brexit negotiations and that the fisheries negotiations and the wider trade negotiations be fully linked to safeguard the economic and social future of both the European fishing industry and coastal communities.

EUFA pointed out that trade and co-operation among European fishing communities has been the backbone of commercial and social development in Europe for centuries. Social, economic and cultural development have been driven by this transnational way of life long before political arrangements and must be allowed to continue. Fisheries developed successfully because the benefits of co-operation were acknowledged and developed with sharing of territory and resources in the common interest. The advantages of cross-border movement and commerce were valued and developed over many years and brought prosperity and development to many coastal areas which would otherwise have had little natural resources.

Many communities from a variety of backgrounds are currently undergoing upheaval and change brought about by global events outside their control. The stability of coastal communities now faces additional uncertainty from Brexit. EUFA has identified threats such as excluding European fishermen from their traditional fishing grounds, and the possible changes to distribution of catch quota, as major concerns.

The impact of Brexit will have an immediate and direct effect on the fishing industry, shore based processing and handling, employment, and wider ancillary activities in coastal communities. There will be no gradual lead-in time or alternative developments. EUFA is calling on European policy-makers to approach the issue of fishing rationally and sensibly, keeping in mind the impact Brexit could have on this sector. EUFA calls on European decision-makers to ensure that during the second stage of the Brexit negotiations that the fisheries negotiations and the wider trade negotiations are fully linked.

Editorial

by Sean O'Donoghue

CHIEF EXECUTIVE, KFO

This year's Fisheries Council promised to be one of drastic cuts to many of our key species, particularly demersal species where there are already enormous challenges from implementation of the Landings Obligation. KFO has no difficulty supporting reductions in fishing effort when there are valid reasons, such as protection of stocks, but in many cases the Commission was proposing cuts in contradiction to the scientific advice and its own stated policy. We appealed to Minister Creed in advance of the Fisheries Council to do all in his power to have these proposed cuts reversed or we would be looking at substantial job losses and financial damage to the Irish fishing industry.

The negotiations were more positive than expected and produced favourable results for Celtic Sea demersal stocks with some substantial increases and, at worst, break-even with 2016 levels. We were disappointed with the 20 per cent reduction in mackerel but it was expected and was due to a scientific mistake and changes in the assessment rather than any stock problem. ICES must put a quality assurance system in place as a matter of urgency.

As usual, the final outcome for Ireland was substantially improved by the implementation of the Hague Preferences. This same device which benefits coastal communities in Ireland is applied to the United Kingdom quotas illustrating how closely aligned our fishing industries are and the potential damage which can occur post Brexit. Currently, the intention of the UK to leave the European Union is the single greatest threat to the Irish fishing industry. We have major concerns about access and loss of percentage share of key stocks. The only protection from such a scenario is to ensure that fisheries negotiation and the wider trade negotiations are fully linked in the second stage of the Brexit talks.

This call for linking the fisheries negotiations and wider trade negotiations has been reiterated by the European Fisheries Alliance which met in Santiago de Compostela in October (see page three.) The members of EUFA, which includes KFO, are equally concerned regarding the possible damage which Brexit may cause the entire European fishing industry and the many coastal communities which are sustained economically, socially and culturally by fishing. Many peripheral maritime areas are already under pressure from external forces over which they have no control; EUFA fears an attack on their traditional way of life could be a death knell for many such communities.

The Department of Agriculture, Food and the Marine (DAFM) has issued two reports on aspects of trawling activity inside the 6nm limit (see right). While these reports are not intended as a proposal, there is no doubt they will initiate a debate in this regard which will not be well-informed or logical since the reports themselves are neither comprehensive or balanced. The catch analysis is based on a very limited timeframe (2014–2016) and number of vessels, while the economic assessment makes a very dubious assumption that less than half (50 per cent) of the species catch is caught within the 6nm zone, then upon exclusion the previous quantities can be caught outside the 6nm zone. Therefore, it concludes, there will be no net impact, only a redistribution of effort. There is no basis for this assumption and it ignores the individual vessel affect.

On a positive note it is encouraging to read the recent progress of the genetics study "Herring Stock Identification Project Update" (page three.) KFO initiated this project and has been closely associated with it over the past years. The project has identified a number of potential genetic differences between the 6aS/7bc and 6aN herring stocks which facilitated it to proceed with additional sampling and refining of the genetic techniques. Our objective is to have definitive stock assessments of the separate herring populations to enable management of two separate stocks but the long-term and wide-spread potential this work has for all fisheries science is enormous and KFO is proud to have been involved so far.

We have another good news story this year with the advances Irish seafood is making on global markets. This is largely due to the collaboration between BIM and Bord Bia which has moved seafood onto a whole new level of professional marketing and branding. Bord Bia has a worldwide reputation in this field and being able to tap into the well-oiled machine which Bord Bia can apply to challenges such as traceability, product development and access to markets can solve many problems for our seafood industry. The Bord Bia flagship Origin Green has been given a marine twist under BIM guidance and will be a very valuable implement in our sustainability toolbox going forward.

I must take this opportunity to thank Minister Creed and his team for their tremendous support during all the fishery negotiations this year and, in particular, throughout the recent lengthy Fisheries Council. Their tenacity to gain the best possible deal for the Irish fishing industry was exemplary and we would have fared far worse without their efforts. Similarly, we are indebted to the staff at the Marine Institute and BIM for their continued input. Finally, on behalf of all the KFO staff I would like to wish all our members a very happy Christmas and prosperous fishing in 2018. I look forward to continue to work with you to address the challenges and opportunities to achieve a sustainable and profitable Irish fishing industry.

Review of Future Trawling Inside 6nm Limit

Discussion on trawling activities inside the six nautical mile (6nm) limit, which included possible restrictions on the size of vessels operating in this area, and prompted by the withdrawal of the UK from existing voisinage arrangements earlier this year, led to the DAFM commissioning reports from both the Marine Institute and BIM to inform further debate. The reports do not constitute a proposal to exclude vessels of particular size categories from inside 6nm but are intended to provide an analysis of the extent and impact, both from a biological and economic viewpoint, of such trawling activities.

The Marine Institute's report "Trawl and Seine Fisheries in Waters Inside 6nm Around Ireland" used data from the average annual landings and effort for different trawl gear and vessel length category for the years 2014 to 2016. The data was compiled from combinations of VMS, logbook information, volume and value of landings recorded. The data is only comparable for this short period due to the differing monitoring systems, historically and currently, among the size categories. The size categories for which data was available were 10-12 metre, 12-18 metre and over 18 metres; under 10 metre vessel data is not included. The report also broke down effort by gear type such as otter-board, mid-water trawl, mid-water pair trawl, bottom pair trawl and both Scottish and Danish seine types. To provide information regarding location of landings, VMS data was linked to logbook data which the authors point out may create some discrepancies; where there was an obvious mismatch the data was discarded.

The Marine Institute carried out the review on the 27 most important species recorded. The report provides volume and value of landings for each size category, the number of vessels in that category and the gear used both inside and outside the 6nm limit, including the internal waters inside baselines. The volume and value data are also very effectively spatially represented for each species showing the distribution of effort inside the 6nm limit.

The Marine Institute pointed out the existence of a variety of environmental issues which have a very high impact on fishing effort in the inshore area. These environmental issues are very likely to increase and create even more restrictions in coming years; they need to be included in any review of fishing activity in the 6nm sector.

The economic analysis of the impact of restriction of specific length categories effort inside the 6nm limit was carried out by the BIM's Fisheries Development Section. The analysis considered two scenarios: (1) The exclusion of all trawling activity inside the 6nm zone by all vessels greater than 18m, and (2) the exclusion of all trawling activity inside the 6nm zone by all vessels greater than 12m. Of the 27 species considered in the report, the 12-18m segment (scenario 1) is dependent on the 6nm zone for six of those species, namely, herring, sprat, black sole, turbot, skate and ray. In real terms this would be a loss of €1.5m or 12 per cent of the segments total value. If these landings were not replaced with landings from outside the 6nm zone these losses could rise to €3.9m and 32 per cent of total landing value. Scenario 2 would extend the impact further with the additional loss of sprat for both size categories resulting in an immediate additional loss of €2.5m; if the losses could not be made up in other zones the total loss would be almost €10m.

These reports are directed at very specific issues but there are many other factors which would add substantial negative outcomes for the current operators and the wider community if their effort inside the 6nm limit was curtailed. The 6nm zone is strongly linked to small fishing communities around the coast where the presence of all vessels has a role. Reducing such activity would have immediate effect on the prosperity of those communities; excluded or restricted effort would encourage vessels to base themselves in larger ports, the local fishing industry infrastructure already under threat would decline further, the ability to resist additional environmental constraints would be weakened. It is unlikely the current under 10m fleet could replace the landings or value but there could be an increase in activity by a higher number of under 10m vessels which could outstrip current environmental degradation.

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**