



European Bottom Fisheries Alliance (EBFA) Is Outraged at Commission's Implementing Vulnerable Marine Ecosystems (VMEs) Regulation

On September 15 the European Commission published an implementing regulation which puts an end to bottom fishing in VMEs in 87 different areas in the waters of Ireland, France, Spain and Portugal (see map on right.) The key closures areas for Ireland are in the Porcupine which will affect our valuable *Nephrops* fishery.

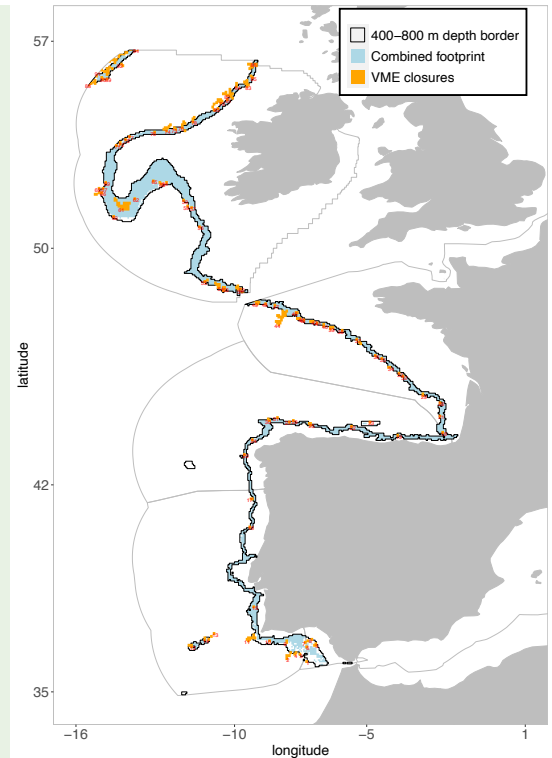
The Commission has been preparing an Action Plan to restore and protect existing biodiversity in marine areas, particularly those already identified as VMEs and already categorised as potential Marine Protected Areas (MPAs.) Despite the repeated delays in finalising the long-awaited Biodiversity Action Plan, the Commission has set implementation of Regulation (EU) 2016/2336 in train with virtually no constructive consultation with the thousands of fishers and the related industries – fish processing, vital food supply chains, ancillary port employment, etc., – which will have a devastating impact on coastal communities along the Atlantic seaboard.

The EBFA, set up earlier this year to represent the EU countries, such as Ireland, most affected by this regulation are outraged that the Commission has published this implementing regulation, knowing that it was flawed and not using the correct data. EBFA has already addressed its concerns to Commissioner Sinkevičius (see extract from letter below) and is formally requesting the Commission to put the entry into force on hold until the administrative uncertainties deriving from the implementing act are resolved and the updated ICES advice is available in November.

In addition, should there not be any constructive response from the Commission, the EBFA will consider its options, including legal options. The EBFA is expecting the support of the authorities in those countries affected by this legislation.

"The negative socio-economic consequences of such approach by the Commission will be devastating for many fishing companies, ports, logistics, ancillary industry and food security, not to mention the breach of trust and sensitivity towards coastal fishing communities. We are dealing with a sector that has been heavily impacted by current and former crisis (COVID, Ukraine, Brexit) and is now the victim of disproportionate EU domestic policies. Furthermore, it is fundamental to tackle the legal and administrative uncertainties deriving from the implementing act and the ensuing effort displacement which will certainly create fleet conflicts between gears and flags. We therefore formally request to put the entry into force on hold until all these issues are clarified. EBFA is still committed to a continued open dialogue with you and your services and to the protection of VMEs in concerted collaboration with the sector. For this purpose, we request a meeting with you and your services as a matter of urgency at any day and time of your convenience."

(Extract from letter to Commissioner Sinkevičius from EBFA, September, 2022)



Jacinta and Ted Breslin pictured with Ciaran Doherty, KFO Chair, at the Boathouse Restaurant, Killybegs to mark Ted's retirement from the KFO.

In the December 2020 newsletter we reported on the KFO's engagement with the NEPTUNUS project, whose goals were to develop circular economy strategies for seafood supply chains, investigate the water-energy-seafood interconnection and develop a life-cycle inventory (LCI) database of seafood for the Atlantic Area. The project, coordinated by the University of Cantabria and with partners in the University of Galway (formerly NUI Galway) and Athlone IT (now TUS), is an Atlantic Area Interreg funded project conducted in five European countries (Ireland, the United Kingdom, France, Portugal and Spain) from 2019 to 2022.

The project has been very successful at highlighting the low carbon footprint of the KFO RSW fleet and has set a baseline against which future efficiency measures can be rated. Plans are now being developed to conduct the same analyses on the KFO's demersal and crustacean sectors. Discussions are also ongoing with BIM on how life-cycle assessments (LCA) analysis may be implemented on an annual basis and how the methodology may be extended to the processing sector so that the complete life-cycle of valuable seafood products may be accounted for.

The goal of greatest interest and importance to the KFO members and wider Irish industry was the development of baseline LCIs and (LCAs) of Irish seafood. LCA is a technique that develops an inventory of the inputs (e.g. fuel, feed, etc.) and outputs (e.g. waste, carbon emissions, etc.) of a product and relates it back to a core unit (e.g. 1 kg of fish landed.) The environmental burden of these material and energy flows for this product are then assessed using a number of impact categories. Some of the more important impact categories for seafood include climate change potential (a measurement of carbon footprint), water use (water footprint) and energy use (from raw material extraction through to processing.) Additional analyses also includes the Nutrient Rich Food Index and the Edible Protein Return on Investment, which represent a measure of the nutritional value of the product.

As a first case study it was decided to perform the analysis on the KFO's pelagic Refrigerated Seawater (RSW) vessels. All 17 vessels took part in the study, which assessed two main activities – the vessel (construction and maintenance) and the fishing activity. The results of the LCIA (Life Cycle Inventory Analysis) indicated that the associated impacts of the pelagic fishing activity were comparatively low, whilst the nutritional value of the end product was high. The results of the analysis were presented as mixed pelagic stock and across the fleet there was an average carbon footprint per kg of fish landed of 0.381 kg CO₂ eq. emitted, which compares very favourably with recent studies conducted on other pelagic fleets.

As expected, the main drivers of environmental burdens associated with the KFO RSW vessels' activities were due to fuel production and combustion of that fuel. The associated Fuel Use Intensity (FUI) for the KFO fleet was 110.9 L/tonne of fish landed (range 47-168 L/tonne.) This value places the KFO RSW FUI at lower than the global average (140 L/tonne.)

The Edible Protein Return on Investment averaged 32 per cent, which is a very high return on energy investment. As a comparison, efficiency rates for cattle production have previously been reported to be in the region of 2.5 per cent with lamb production at 1.8 per cent and chickens at 25 per cent (Vázquez-Rowe et al, AMBIO, 2014, 43: 381–394). These results highlight the comparative efficiency of small pelagics as a food source and add to the sustainability and efficiency credentials of seafood.

On September 30 ICES released the catch advice for the Widely Distributed stocks. Full advice sheets are available on the ICES Latest Advice webpage (<https://www.ices.dk/advice>). Overall, the prospects for 2023 are quite mixed. The most notable figures are the zero catch advice for the Western Horse Mackerel and the 81 per cent increase in advice for Blue Whiting.

Species	Stock code	Stock	2023 advice (tonnes)	%Change from 2022 advice
Herring	her.27.1-24a514a	Norwegian Spring Spawning	≤ 511171	-15
Sprat	spr.27.67a-cf-k	West of Scotland, southern Celtic Seas	≤ 2240	0
Mackerel	mac.27.nea	Northeast Atlantic and adjacent waters	≤ 782066	-2
Horse mackerel	hom.27.2a4a5b6a7a-ce-k8	Northeast Atlantic	0	-100
Blue whiting	whb.27.1-91214	Northeast Atlantic and adjacent waters	≤ 1359629	+81
Boarfish	boc.27.6-8	Celtic Seas, English Channel, and Bay of Biscay	≤ 22791	0

The Horse Mackerel is particularly worrying and though F has been decreasing in recent years it is just above F_{MSY} . In recent years each new assessment has resulted in a consistent downward revision in previous estimates of SSB and an upward revision of previous estimates of F. There is an urgent need to benchmark the assessment and central to this is the question of stock identification. As illustrated with the Northwest herring, inaccurate delineation of stocks for stock assessment can confound the development of reliable estimates of stock abundance. There are known issues of mixing with the North Sea horse mackerel stock between divisions 7.e and 7.d. There is also a known issue with the delineation of the stocks in division 4.a, where they are considered part of the North Sea stock in Q1 and Q2 and part of the Western stock in Q3 and Q4. There is no scientific basis for this delineation. The southern border of the Western stock is also likely to extend into the Southern stock area. Industry funded genetic research is ongoing to resolve this and it is hoped that the three horse mackerel stocks will be benchmarked together.

The significant increase in the Blue Whiting advice is encouraging and is largely the result of the strong recent year classes entering the fishery. It is imperative that this positive trend is not compromised by unsustainable fishing by non-EU nations.

The small decrease in the mackerel advice is only to be expected given the continued overfishing by Norway and the Faroes. It is critical that the Commission act decisively against this irresponsible and reckless behaviour and there is an urgent need to adopt a sharing arrangement amongst the coastal states. The KFO is also of a firm view that the management of fishing in international waters should be limited to a maximum of 10 per cent of overall catches.

The boarfish advice is a rollover of last year's advice and is still conservative given the recent signs of good recruitment to the stock. The boarfish assessment will be benchmarked in early 2023 and it is hoped that the new assessment will better reflect the reality that is seen on the grounds and move the assessment from a Category 3 to a Category 1 assessment.

The ICES Workshop on a Research Roadmap for Channel and Celtic Seas Sprat (WKRRCCSS) recently took place in the Marine Institute (September 12-14) and was attended by scientists, industry and NGOs from Ireland, Scotland, England, Wales, France and Sweden. The workshop aimed to develop a roadmap towards the development of assessment and management of the sprat stocks in ICES areas 6 and 7.

Currently ICES recognises two sprat stocks outside of the North Sea and Skagerrak, namely sprat in Divisions 7.d-e (Channel sprat) and sprat in the Celtic Seas. The Channel sprat is subject to a Category 3 assessment with advice based on a Constant Harvest Rate but the Celtic Seas sprat (Divisions 7.a, b, f-k and 6.a) is not assessed, with ICES providing precautionary advice every second year. At the moment catch data is collated for all areas where sprat is caught, either in targeted fisheries or as a bycatch. This is far from ideal as the perception among scientists and industry is that there are distinct populations of sprat that are targeted in the main fisheries in Donegal Bay, Waterford, the Irish Sea and in the Minch near Mallaig. However, there is currently no way to tell how many populations of sprat there are, and as such, there is no basis to divide them into stocks

for assessment and management. There is also uncertainty about the biology of sprat and in particular the spawning seasons in the different areas. It is critical to resolve these issues before developing the assessments so we can avoid incorrect delineations.

During the workshop there were many interesting presentations and discussions on current knowledge and also the data gaps that exist, of which there are many. The workshop ultimately resulted in an extensive list of action items that need to be addressed in the short term in order to at least provide the basis for defining the stocks for assessment. Central to this was the initiation of a genetic stock identification programme using the same approaches that were successfully deployed on the 6.a,7.b-c herring issue. This work has already been initiated on the North Sea sprat and the

idea is to submit additional samples to this project so the entire distribution area can be analysed together. This will give the most comprehensive overview of population structure and will help to identify genetic markers that can then be used to resolve the finer level structure around Ireland and west of Britain. Sampling is to start immediately as the fishery is starting and there are a number of upcoming surveys including the Celtic Sea Herring Acoustic Survey and the Irish Groundfish survey, which have the potential to be good sampling platforms. There will also be an effort to review existing literature on the biology of sprat and existing survey datasets before ICES HAWG next year, where they will be discussed in more detail. Given the current lack of scientific knowledge about sprat it is important to ensure industry knowledge is made available to the process.

Working Group Set Up to Facilitate Dialogue Between Fishing Industry and Offshore Renewable Energy (ORE) Development

At its inaugural meeting the Seafood/ORE Working Group agreed a number of actions including “To publish a Guidance Document as a template for best practice communication between the seafood and ORE sectors at all stages of the development lifecycle.”

The Department of Housing, Local Government and Heritage (DHLGH) has already identified the role of the Working Group as being to facilitate discussion on matters arising from the interaction of the seafood and offshore renewable energy industries, to promote and share best practice, and to encourage liaison with other sectors in the marine environment. The primary focus of this group will be to develop a template for communication between the seafood and fisheries sectors and ORE at all stages of the development lifecycle.

KFO has been interested in the ORE sector for some time and is aware of difficulties, particularly for the fishing industry in the Irish Sea and south, southwest coastal regions, and is determined these scenarios will not be repeated in the northwest. In this

regard we have established six key principles which would underpin our approval of ORE developments in our area. The six key principles are:

1. A bottom-up approach with the fishing industry involved from the start;
2. No “lines on maps” from developers;
3. Only interested in offshore (>50Km) floating wind energy;
4. Biodiversity protected and no detrimental effect on fishing or limitation to access traditional fishing grounds;
5. Significant benefits for local community and seafood sector; and
6. Developing Killybegs as a hub for alternative energy such as hydrogen/ammonia.

KFO is acutely aware of the necessity of developing ORE and, in common with many other sectors, our members have been severely affected by the recent fuel crisis. Developing alternative energy sources is essential and, to that end, KFO, in agreement with other local entities, has entered into discussions with a developer with substantial global experience in floating offshore wind.

In the interests of all parties, we have entered into a Memorandum of Understanding (MoU) with the developer which fully incorporates our six key principles. We hope to establish common ground with our colleagues in the Seafood/ORE WG to ensure a smooth transition from existing fossil fuel based industries to a renewable energy driven economy in the interests of the Irish fishing industry and wider society.

Editorial



by Sean O'Donoghue

CHIEF EXECUTIVE, KFO



The Irish fishing industry is currently experiencing a "perfect storm" of negative impacts created by a combination of continued Brexit fallout and international unrest following the Russian invasion of Ukraine. A critical consequence has been a huge spike in fuel prices which has consequences for every sector in the supply chain – fishing vessels, transport, processing – from the inshore sector to the largest of our RSW fleet.

From the outset of this fuel crisis the KFO has been in contact with Minister McConalogue to ensure his Department is aware of the seriousness of the situation and we joined our industry colleagues in early July for a virtual meeting with the Minister and his officials to discuss options. We pointed out that the remaining EMFF funding could be used in this instance, but our proposals fell on deaf ears and at this point many Irish fishing vessels remain tied up creating downstream problems for the entire supply chain. This fuel crisis is made all the more galling when we see our European colleagues providing financial support to their fishing industry and, in fact, making the same support available to Irish vessels being re-fuelled in their ports. Assisting vessels to keep operating by subsidising fuel in this instance is not to be confused with the supports in place to offset the Brexit effect and we call on our Minister to support the Irish fishing industry at this very difficult time.

The various Brexit funding schemes (BAR) are well in train with Tie-up Schemes and De-commissioning underway. I am pleased to confirm the RSW Liquidity Scheme has been approved but, as yet, we cannot confirm when the payments will be issued. There are a number of other opportunities available through the Brexit Blue Economy Enterprise

Schemes which may not directly support fishing but are potentially useful to fishing community and support enterprises.

This issue of the KFO News usually reports on the ICES Advice for Widely Distributed Stocks which includes most of those pelagic stocks fished by KFO members. This year the news is a mixture of good and bad outlooks, with blue whiting being given a substantial lift of 81 per cent for 2023, but reductions for our other critical species such as Norwegian Spring Spawning herring, mackerel and boarfish and a very disappointing outlook for horse mackerel with a 100 per cent reduction. Dr Ed Farrell (page two) gives a description of the trends and causes of changes in the advice, as well as his hopes that genetic studies can improve the outlook for these important species.

The 2022 ICES Annual Science Conference took place from September 19-22 at the Aviva stadium in Dublin. The conference was well attended, with 500 scientists present in person and another 200 online. There was a wide range of theme sessions with a heavy emphasis on the Ecosystem Approach to Fisheries Management. Whilst the work towards an ecosystem-based approach is to be applauded we should not forget the ongoing need for more accurate single species stock assessments. As has been seen with the work on the northwest herring there are many fundamental scientific issues with stock identification which should be prioritised and resolved before we can even consider wider ecosystems.

The boarfish benchmark data compilation meetings are due to begin in October as part of the ICES Benchmark

workshop on the development of MSY advice using SPiCT (BWKMSYSPICT). The Marine Institute is putting a lot of effort into improving the boarfish assessment and it is hoped that the new assessment will better reflect the reality on the ground and enable this stock to move from a Category Three to a Category One assessment.

The recent successful genetic stock identification project on the northwest herring has been published in the scientific journal, Royal Society Open Science (<https://royalsocietypublishing.org/doi/10.1098/rsos.220453>) and is available via open access. This ground-breaking work would not have happened without being initiated and continually supported by the KFO and its members. The monitoring fishery facilitated the genetic studies which come to an end this December. This fishery has been a very important component of the North-West winter-spring fishery, particularly for the smaller inshore vessels. To ensure a better future for this, and similar fisheries, the outcome of the genetic stock identification work needs to be reflected in the management of the various stocks in line with the populations rather than the sea basins.

The EU Commission's implementation of the VME (Deep Sea Access) Regulation on September 15 came as a shock to the countries which are most affected, namely Ireland, France, Spain and Portugal. (see page one.) This regulation has serious implications for all countries and needs to be amended as it is not fit for purpose. The countries affected, including Ireland, are demanding that the ICES advice underpinning this legislation be revised and the regulation be amended accordingly. Ireland is a member of the industry body, European Bottom Fishers Alliance (EBFA), which we have described in previous issues of the newsletter.

Climate is now as important for fisheries as it is for agriculture and more complex to manage and predict. There have been a number of high level international climate change meetings this year and we will likely continue to see growing heat-related weather events affecting oceans. Measuring and mitigating carbon in the environment is a valuable tool in the battle against climate change. The ongoing monitoring of Carbon Footprint (CF) for the KFO RSW vessels has been very successful and indicates a sector which is at least going in the right environmental direction. The results of the CF monitoring will be available on the KFO website (www.kfo.ie) in the near future and will be followed with similar outcomes from the other KFO sectors.

Ireland's journey towards a carbon-free environment continues to move on and a significant milestone was the recent launch of the Seafood/ORE Working Group led by Captain Robert McCabe and includes representative leaders from all sectors of both the seafood industry and the Offshore Renewables Operators. KFO is a member of this new body (see page three) and hopes to influence developments which will benefit all sectors and the wider community by means of our well-publicised key principles. We feel KFO's approach will eventually be recognised by both sides of this debate to be a rational way forward and best option all round.

I must close this newsletter by paying tribute to our long-term colleague and friend, Ted Breslin, who retired in 2021. Ted was a tower of strength to me, Olga and Norah and all our members throughout his 38 years of service to Killybegs Fishermen's Organisation but we were unable to show our appreciation at that time due to the pandemic. Recently we remedied that when Ted, his wife Jacinta, son Nicholas and wider family members joined the KFO staff and members for a meal and presentation in the Boathouse Restaurant, Killybegs (see page one.) Our very Best Wishes to Ted and Jacinta and many happy years of retirement. Go n-eirí an t-ádh leat, Ted.

Important Dates October - December 2022

DATE	MEETINGS	VENUE
Sep 30	ICES Advice (Pelagic Stocks) Published	Virtual
Oct 3	IFSRP	Marine Institute
Oct 4	Northern Pelagic Working Group (NPWG)	The Hague
Oct 5	PelAC WG1 & WG2	The Hague
Oct 6	PelAC General Assembly & Executive Committee	The Hague
Oct 11-13	Benchmark W'shop on development of MSY advice using SPiCT data compilation	Virtual
Oct 13-14	Coastal States mackerel	London
Oct 17-18	Coastal States Blue Whiting & ASH	London
Oct 17-18	Fisheries Council	Luxembourg
Oct 19	Quota Management Advisory Committee (QMAC)	Clonakilty/Dublin Hybrid
Oct 20	Brexit Inter-ACs meeting	Virtual
Oct 24	Start EU/UK negotiations 7 rounds planned	Brussels/London
Oct 25	LDAC WG2 & WG4	Brussels
Oct 26	LDAC WG1 & FG ICCAT	Brussels
Oct 27	LDAC WG5	Brussels
Oct 28	Release of advice on Nephrops Celtic Sea, angler fish, Rockall megrim	ICES
Oct 31	Start EU/Norway/UK negotiations	TBC
Nov 07	Symposium on Small Pelagics	Lisbon
Nov 7	Start EU/Norway negotiations	TBC
Nov 15-18	NEAFC AGM	London
Nov 21-2	Fisheries Council	Brussels
Nov 30	LDAC - ExCom	TBC
Dec 12-13	Fisheries Council	Brussels

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