

From: IIMRO Policy <policy@iimro.org>

Sent: Friday 3 October 2025 13:58

To: Fishing.Opportunities2026 <Fishing.Opportunities2026@agriculture.gov.ie>

Subject: IIMRO SIA Submission

Dear Sir/Madam,

Please find below a submission on behalf of the Irish Islands Marine Resource Organisation for fishing opportunities for EU fish stocks 2026.

- The setting of zero TAC for inshore species such as pollack is having a disproportionate impact on small scale vessels which target them with a hook and line. Priority access must be given to selective, low-impact fisheries, that inshore boats depend on, within the fishery management and scientific systems. In addition, no provision has been made for the social impact of such closures for directed fisheries as provided for in the EU regulations. Representative inshore surveys which reflect inshore species habitats and seasonal variations must be prioritised and a reopening of the pollack handline fishery is critical in the new year.
- IIMRO remains strongly opposed to an EU agreement which would allow access of the Icelandic industrial fleet to EU waters. There is widespread strong opposition to such a deal and no benefit to Ireland. Access will increase pressure on stocks and a deal would vindicate the setting of unilateral quotas of migratory fish stocks above scientific advice by Iceland. Any deal should only be considered as part of Icelandic EU accession talks. As feared, recent catastrophic declines in pelagic stock advice have unfortunately materialised as a result of overfishing.
- Producer Organisation Funding. The current two tier funding of POs in Ireland must be urgently addressed; newly formed producer organisations are currently excluded from accessing funding under the EMFF/EMFAF. The current funding scheme is not fit for purpose and prefinancing of new POs is necessary.
- Increasing overheads are an ongoing issue and are likely to increase significantly in the short to medium term due to the ongoing conflicts. Targeted supports such as those available in other member states must be delivered in Ireland to ensure a level playing field. Decarbonisation of the EU fisheries fleet must prioritise the small scale fleet that make up the majority of vessels with investment in necessary onshore infrastructure provided for.
- Article 17 of the CFP must be implemented immediately to provide access to fishing opportunities for the small scale fleet and new entrants and to ensure generational renewal across the EU. Social indicators should be included in all assessments. The use of track record to allocate fishing opportunities must be discontinued and phased out in the short term.

- New entrants. Measures must be included to prioritise generational renewal within the fisheries fleet with a move away from the promotion of diversification into other sectors. The current decommissioning policy for vessels and capacity should be abandoned .
- Food security needs to be prioritised by providing practical targeted support to the small scale and inshore fleet segments and the development of resilient short supply chains for locally caught seafood. The importance of short supply chains is now more evident than ever.

Regards,

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