



3rd October 2025

Killybegs Fishermen's Organisation (KFO) Submission Regarding Sustainable fishing in the EU: state of play and orientations for 2026 and ICES Advice for 2026

Main Points

- KFO highlights that the SIA for 2026 comes at a time of the deepest crisis to face the Irish seafood sector. The seafood sector is facing a catastrophic situation in 2026. Scientific advice for key pelagic and whitefish stocks for catches in 2026 has recommended suggest drastic reductions in the catch advice for stocks which will result in losses estimated at €60-80 million.
- KFO stresses that if these cuts are translated into fishing opportunities for 2026 then this will challenge the economic viability of the Irish catching sector; starve fish processing businesses; and impact ancillary industries that support the seafood sector in coastal communities.
- KFO requests BIM is tasked to carry out a comprehensive analysis of the economic impacts of the projected cuts in fishing opportunities arising from the scientific advice, given the unfolding situation for 2026.
- KFO urges the Minister to engage with the industry to develop a package of measures to support the industry during 2026.
- KFO urges the Minister to invoke all Hague Preferences for 2026 given the drastic reductions in fishing opportunities likely next year.
- KFO urges the Minister and the EU to call out the actions of other Coastal States in setting unilateral excessive and unjustified mackerel quotas.
- KFO stresses that the highest priority should be given by the Commission to reach agreement on all-party sharing arrangements for mackerel, blue whiting and Atlanto-Scandian herring, based on genuine historic track records.
- KFO supports the European Commission's legislative proposal on identifying and sanctioning non-EU countries allowing unsustainable fishing practices.
- KFO highlights the stark ICES advice for mackerel for a 70% reduction shows clearly that the actions of these States have led to the near collapse of the mackerel stock.
- KFO highlights that the ICES assessment for boarfish is driven by a single data point and does not reflect the reality on the fishing grounds. The KFO calls for a review of the survey data and the possibility of an in-year revision to the advice.

- KFO stresses that it is imperative that action is taken to stop the unsustainable fishing of blue whiting by non-EU nations. Better management would also allow a large proportion of the stock to grow larger, which would benefit the fishery for human consumption.
- KFO stresses that any new access for Norwegian vessels to parts of EU waters should not be considered and only be offered in exchange for payment in fish and based on a revised and limited transfer agreement.
- KFO highlights that the footnotes to the horse mackerel TACs contained in the fishing opportunities regulation need to be adapted to ensure consistency between the North Sea horse mackerel and the Western horse mackerel. Specifically, the 5% flexibility between 7d and 7e should be removed given the zero-catch advice for the North Sea stock.
- KFO has concerns over the ICES advice for cod in 6a. The KFO does not accept that the poor state of the Southern cod sub-stock should have such a profound impact on the fishing opportunities for the Northern sub-stock. The KFO supports the Fmsy advice for the Northern sub-stock should be the basis for fishing opportunities in 2026.
- The KFO has concerns regarding the splitting of the Northern sub-stock between the North Sea and the West of Scotland. It is important that share allocated to the West of Scotland is not disadvantaged in favour of the North Sea.
- KFO stresses the need for proper data collection and development of a more robust stock assessment for Rockall cod. The KFO highlights there is a need to recognise the choke risk in setting this TAC for 2026 given the level of the Rockall haddock TAC.
- KFO notes ICES has advised zero catches for the three main gadoid stocks in the Celtic Sea, with all three are in a highly depleted state with low SSB and poor recruitment. There is increasing evidence to indicate that climate change is impacting significantly on the recovery of these stocks. The KFO highlights that research into the impacts of climate change on fish stocks is intensified.
- KFO urges the Commission maintains its' approach of setting by-catch TACs to avoid the premature closure of multiple fisheries in the Celtic Sea.
- KFO would recommend, in line with the NWW MAP that remedial technical measures are introduced to protect the remaining stocks. Such measures need to be introduced in fully consultation with the industry, be practical and not result in economic losses in respect of marketable catches of other species that render vessels uneconomic.

Introduction

The “Communication from the Commission to the European Parliament and the Council Sustainable fishing in the EU: state of play and orientations for 2026”, the accompanying Commission Staff Working Document and the Marine Institute summary of the ICES Advice document have been made available to enable interested parties to submit their comments on the Department of the Agriculture, Food and the Marine’s annual Sustainability Impact Assessment (SIA) regarding the setting of Fishing Opportunities in 2026.

The SIA for 2026 comes at a time of the deepest crisis to face the Irish seafood sector. The seafood sector is facing a catastrophic situation in 2026. Scientific advice for key stocks for catches in 2026 has recommended suggest drastic reductions in the catch advice for stocks. This advice includes a recommended 70% reduction in mackerel catches, 41% reduction for blue whiting, 22% reduction for boarfish and zero catches for cod, haddock and whiting stocks.

If these cuts are translated into fishing opportunities for 2026 then this will:

- Challenge the economic viability of the Irish catching sector.
- Starve fish processing businesses of raw material and in the pelagic sector will lead to closures, such is the level of cuts to three of their main pelagic species.
- Impact ancillary industries that support the seafood sector in coastal communities.

For the pelagic catching sector, including the 23 RSW vessels and 14 multi-purpose vessels, the loss of income from these cuts is estimated to be more than €60 million compared to 2024, with the jobs of the approximate 200 fishermen employed on these vessels at threat. In combination with transfers of quota to the UK from Brexit, this will mean the mackerel quota will have been reduced by 85% since 2022. Mackerel landings were valued at €82 million in 2024 and are Ireland’s most important stock by value for both the catching and processing sectors.

From the whitefish sector perspective, the combination of zero catch advice for key demersal stocks and advised reductions for other stocks such as West of Scotland cod, Celtic Sea sole and Irish Sea haddock will impact approximately 160 whitefish vessels greater than 12m in the Irish fleet. These vessels collectively have annual landings of €140 million and employ approximately 650 crew. The whitefish fleet has become increasingly reliant on *Nephrops* quota to remain viable, with 50-60% of the remaining whitefish vessels now deriving most of their income from *Nephrops*.

Negative scientific advice for the *Nephrops* stocks for 2026 in combination with the reductions in fishing opportunities for whitefish stocks could see the fleet reduce by as much as 30-40% in 2026. Given the significant reductions in quotas likely the whitefish and *Nephrops* fleets will require support in the form of temporary tie-up aid to take pressure of quotas during the year and spread the limited opportunities available across the fleets on a seasonal basis. Any temporary tie up schemes, needs to have corresponding support measures for the fish processing units, unlike the Brexit measures when a tie up scheme failed to link with the processing sector, which led to massive pressures within the fish processing sector.

The potential reduction in raw material available to the pelagic and whitefish processors, coming at a time when these processors have been starved of raw material since Brexit, will undoubtedly

lead to some of these businesses ceasing to trade with resulting job losses. This sector comprising 91 companies employing 3,800 staff will require support to adapt their businesses to a situation where raw material is harder to source. To put in context, the Brexit transfers of quota in pelagic processing amounted to 26% of the value spread over five years, the 2026 advice from ICES, is effectively taking 80% of the value for processing in one year. The cuts in catches being advised by ICES across the board for pelagic and demersal stocks if translated into fishing opportunities will leave the industry on the brink of ruination. This will impact on the future viability of most of the fleet above 12 metres and will have knock-on impacts on the entire onshore fish processing sector which has already suffered huge losses in turnover.

The KFO highlights that profitability across the board is reducing at an alarming rate. According to SFPA data, landings by Irish vessels reduced by €37 million in 2023 compared to 2022, a reduction of 12%. A further report from BIM showed that gross profit for the fishing fleet decreased by a massive 82% in 2023. According to BIM, exports have fallen by 21% in volume and 10% by value overall. The difficult conditions faced by Ireland's pelagic sector are specifically highlighted in the BIM report with export volumes for key species such as blue whiting falling by 65%. These are worrying trends.

In preparing the SIA for 2026, the KFO urge the Minister ensure that stakeholder engagement and advice is given due attention in developing Ireland's position in respect of all the different negotiations, taking account of the parallel processes outlined.

In responding to this consultation, the KFO has commented on the SIA process and format, Commissions Communication - Sustainable fishing in the EU: state of play and orientations for 2026¹, the scientific process, the failure of the coastal states to reach agreements on widely distributed stocks and on the individual stocks of most relevance to the KFO members.

SIA Process and Format

The KFO is supportive of the SIA in advance of the fisheries negotiations of fishing opportunities for 2026, as we see it is an important analysis that will inform the Minister regarding the needs of industry in advance of these negotiations. As outlined, for 2026, this will be particularly challenging. It will be essential to task BIM to carry out a comprehensive analysis of the economic impacts of projected cuts in fishing opportunities arising from the scientific advice, given the scale of the cuts in catches advised. This is particularly the case for the pelagic fisheries, where the likely impacts on the catching sector, processors and support services could be catastrophic. This analysis needs to go further than simply looking at the projected quotas based on the scientific advice. It needs to take account of historic quota uptake, banking and borrowing, swapping patterns for the most important stocks that drive the economics of the fishing fleet.

Commission Communication COM(2025) 296 final

Overall, the message from this document is almost identical to last year's report. It once again highlights the improvement in the status of many stocks across sea basins, including the Northeast Atlantic. Fishing mortality continues to decrease reflecting the efforts made by the EU

¹ Communication from the Commission to the European Parliament and the Council Sustainable fishing in the EU: state of play and orientations for 2026 – COM(2025) 296 final

fishing industry in the last decade. There are still stocks that are overexploited, and we support efforts to recover such stocks where possible, given that non-fishing impacts are having a significant effect on the state of stocks in the NE Atlantic. The impacts of climate change are now being seen and this needs to be considered in setting fishing opportunities in the future as well as remedial measures and financial support that may be needed. Additionally, the impacts of renewable energy development as well as pollution on stocks and fisheries is understated in the Communication.

Progress in Achieving Sustainable Fishing in the EU

- In setting fishing opportunities, the Commission's guiding principle is to follow the F_{MSY} advice. There is no disputing this. However, while the Commission notes the setting of TACs based on F_{MSY} ranges and using F_{MSY} upper, in practice F_{MSY} upper range is rarely, if ever used. In fact, in many cases the Commission has chosen to set TACs well below the F_{MSY} advice when such advice has been for large increases in quotas. The general trend seems to be to set quotas following the ICES advice when the advice is negative, but not the other way round when the advice is positive. No figure is ever provided for the TACs that are set below scientific advice, only the ones where the advice is above F_{MSY} are highlighted, including the zero catch advice stocks.
- There continue to be concerns with the quality and consistencies of ICES advice. For example, the advice for Irish Sea herring has been re-issued on several occasions and there are continuing concerns about the quality of this advice. Similarly, the advice for Northern Sea cod was delayed because it appears ICES own Advisory Committee disagreed with the approach to take in providing this advice. To give confidence to the fishing industry that the advice being provided is based on the best possible science, ICES needs to urgently review its advice process to ensure major errors and delays do not recur.
- In providing advice, ICES uses different categories of assessments. For stocks classified as category 5 and 6, the advice is based on extremely limited landings data. According to ICES, *"For such stocks without information on abundance or exploitation, ICES considers that a precautionary reduction of catches should be implemented where there is no ancillary information clearly indicating that the current level of exploitation is appropriate for the stock"*. It has become increasingly apparent, that category 5 and 6 assessments are not fit for purpose. If ICES continues to provide advice for these stocks, they should be consistent in providing such advice. For some category 5 and 6 stocks (e.g., Northern prawn in Area 4) no catch advice is provided, and the summary sheet refers to what data is needed. In contrast, for other category 5 and 6 stocks (e.g. cod in 6b) definitive catch advice is provided, even though this advice is not supported by any meaningful information or survey data. ICES should either aim to develop category 3 assessments for category 5 and 6 stocks or not provide definitive catch advice that is based on extremely limited and misleading data. DGMARE as an advice requestor must also ensure what they ask ICES to provide is sensible and useful for the setting of TACs.
- The report rightly highlights climate as increasingly impacting on fish stocks, and indicates that to tackle the pressure on fish stocks it is crucial that the Member States implement

EU legislation in full. In this regard, the latest scientific advice for 2026 has advised significant cuts in important stocks. For the Irish industry these reductions come on the back of successive reductions in quotas in the last few years under Brexit. The scientific advice points to the impact of climate change particularly in the Celtic Sea, which is inhibiting the recovery of some stocks, particularly gadoids. Given the changes in distribution patterns and failure in recruitment, new fleet adjustment measures such as further decommissioning or temporary tie-up schemes may be needed in coming years to assist the industry adjust to the new reality it now faces from climate change. The Commission must ensure adequate resources are available to assist this adjustment, in addition to the funding under the EMFAF.

Agreements with Norway, United Kingdom (UK) and other coastal States

- It is appreciated that DGMARE has recognised the importance of the Coastal States negotiations and the issues with agreeing sharing arrangements for the stocks managed by the Coastal State parties. It is vital that the Commission keeps the pressure on the other parties who continue to fish unsustainably, jeopardising the mackerel, blue whiting and Atlanto-Scandian herring stocks.
- The KFO advocates the Commission consider the use of Regulation (EU) 1026/2012 to discourage unsustainable fishing by third countries. The measures under this Regulation should not be used simply as a threat.

Balance between the fishing capacity of the Member States' fleets and their fishing opportunities

- When considering the implementation of article 22 of the CFP, the KFO questions the continued relevance of the basis used to set vessel capacity ceilings (gross tonnage (GT)) and engine power (kW). In most cases, fishing fleets are very much restricted by the available quota. Adding a further restriction in the form of capacity ceilings provides no benefit for fisheries management and an unnecessary administrative burden on Member States and the fishing industry in ensuring compliance.
- The STECF report that is the basis for the Commission's assessment consistently identifies many fleet segments to be out of balance. However, this analysis is based on retrospective data that is two years old and may not reflect the current state of the EU fleet.
- STECF has also continued to question the utility of several indicators (SHI and VUR) used in the analysis based on data and methodological issues. As part of the evaluation of the CFP the Commission should take this on board and consider the structure and indicators used and whether the current balance/capacity analysis is fit for purpose. STECF should be requested to advise on improvements to the current process that would provide a more accurate indication of the evolution of the EU fleets.
- The Commission highlights the obligations on Member States to put in place an Action Plan to address the imbalances between fleet capacity and fishing opportunities. However, in many cases such imbalances no longer exist as actions have already been taken to address these imbalances (e.g., The impacts of Brexit).

- It is a shared opinion among the EU fishing industry that restrictions on vessel capacity hinder energy transition, especially concerning modifications to vessels and the installation of technologies that minimise the sector's environmental footprint. Future capacity ceilings, if deemed necessary must reflect this or will hinder the ability of the EU fleet to reduce the carbon footprint.

Socio-Economic Performance

- The Commission indicates that while most national fleets are expected to be profitable in 2025, fleets targeting overfished stocks and using energy-intensive fishing gear, assumed to mean towed gears are unprofitable. While operating costs and the state of the stocks fished have a bearing on profitability, this is an overly simplistic conclusion for all fleets. Whether a fleet is profitable or not is dependent principally on access to quota. Fleets targeting stocks assessed as being fishing sustainably with static gears such as gillnets are not necessarily profitable if they do not have access to quota (e.g. Irish vessels targeting hake with gillnets).
- As in last year's report, the prediction that the EU fleet will be largely profitable in 2025 would appear overly optimistic. In projecting the outlook for 2025, the document concentrates on fuel prices as the only driver of profitability. It fails to acknowledge the continued impacts of Brexit, increase in cheap imports and the serious market conditions being faced. The conflicts in Ukraine and in the Middle East combined with the global price inflation issues have made the cost of doing business increase exponentially and markets for seafood have become increasingly volatile and challenging.
- The Commission recognises the importance of resilient and prosperous coastal communities, but these cannot rely on fishing activities alone. This is an important point given the challenges and pressures now faced by the fishing industry that are the lifeblood of these coastal communities. Additional support as indicated in the Communication will be vital to ensure coastal communities continue to survive.

Landing Obligation

- The Commission continues to point to control and enforcement as the main implementation issues with the landing obligation. While there are undoubted challenges from a control perspective, there are many other implementation issues around the landing obligation, relating to choke species, exemptions and the economics of landing all quota fish. These issues have been highlighted by industry and Member States consistently. The Commission concludes that the introduction of REM will solve all the control issues associated with the landing obligation. REM may help but is not a panacea for implementation of the landing obligation.
- The Commission indicates that it will continue to deduct catches discarded under the de minimis or high survivability exemptions from ICES advice where appropriate. This is a reasonable approach except that the UK has not followed the same approach and set quotas without deductions. This puts EU fishermen at a disadvantage, and the Commission needs to push for a consistent approach to ensure a level-playing field between the EU-UK.

- There have been multiple previous evaluations, studies and projects considering the implementation and effectiveness of the landing obligation. However, these weaknesses and difficulties in complying have been well documented and there seems no need to repeat this exercise. Reform and simplification of the policy is what is required.

Quality Assurance of ICES Advice

The KFO appreciates the positive initiative taken by ICES in developing an Advisory Plan with a Priority list which begins with “**Assuring quality** - *Assure that quality encompasses the entire process from data collection to the publication of objective and independent advice.*” (Advisory Plan, ICES, 2019) and the effort ICES has made in addressing quality assurance in stock assessments. Nevertheless, the KFO continues to witness a lack of consistency in the advice as outlined in the paragraphs below. There is a critical need for quality assurance across all assessments in accordance with the ICES advisory plan and the quality assurance framework (QAF). The implementation of a quality assurance across the entire process and the Transparent Assessment Framework (TAF) across all assessed stocks.

Stock Issues – ICES Advice for 2026 TACs

1. Pelagic Stocks

Mackerel (mac.27.nea): ICES advises that catches in 2026 should be no more than 174,357t, which is a 70% decrease on the advised 2025 catch level. This the lowest mackerel advice ever provided by ICES. The catch in 2025 will again significantly exceed the advised catch level as it has done for at least the past 10 years. As observed recruitment in the stock is at a low level it is a distinct possibility that the scientific advice for 2027 will be for a zero TAC.

The decline in the stock is a direct result of the overfishing by Norway, the Faroe Islands, Iceland, Greenland and Russia who set unilateral quotas and prosecute a quarter 3 fishery in northern waters. This fishery has largely developed since 2010 (Figure 1 & 2). Greenland and Russia now fish entirely in international waters, unless access agreements with the Faroe Islands are made, as mackerel do not occur within their national waters. As the stock has contracted back to its natural range it has also largely withdrawn from Icelandic waters and Faroese waters. To justify their unilateral quota, the Faroe Islands trade part of this quota with the UK in exchange for access to the UK zone. In 2023 Norway, caught most of its unilateral quota in UK waters due to lack of mackerel in its national waters and also traded unilateral quota to the UK for access in 2024. The growth of the mackerel catches by these countries relative to the Irish catch, which has been reducing since 2014, is shown in Figure 3.

Despite the significant 22% reduction in advised catch in 2025, Russia, Iceland and Greenland are estimated to have significantly increased their catches relative to 2024, almost all of which has been caught in international waters. The KFO again reiterates that the management and monitoring of fishing in international waters needs to be tightened significantly, and catches limited to a maximum of 10% of overall catches.

The KFO repeats its request for immediate action by the Minister and the Commission to insist Norway, the Faroe Islands, Iceland, Greenland and Russia stop the massive overfishing of mackerel in the Northeast Atlantic, which have driven the stock towards collapse. It is critical that

the Commission act decisively against this irresponsible and reckless behaviour using all measures available including trade sanctions. There is an urgent need to adopt a comprehensive sharing agreement amongst the coastal states which reflects historic fishing patterns and does not reward the irresponsible behaviour of Nordic nations in setting hugely inflated quotas and increasing fishing effort exponentially.

The KFO is of the opinion that had the ICES advice been followed for the past number of years then the stock would not be in the critical state now advised by ICES and it is likely we would be looking at an increase in the 2026 advice rather than a 70% decrease. The KFO also notes that in setting quotas at EU level, due regard should be taken of the Hague Preference that Ireland has for mackerel. This Hague preference was invoked for the first time in 2024 and given the state of the stock, the 2026 mackerel quota available to Ireland will be significantly below the level at which at Hague Preference can be triggered (i.e., 45,000 tonnes). The KFO urges the Minister to invoke this Hague regardless of political opposition from other Member States. Having seen a reduction in Ireland's mackerel quota by 26% under Brexit, combined with the reduction in the catch advice, the likely quota for 2026 is a catastrophic situation for the RSW pelagic fleet and the processing sector in Killybegs.

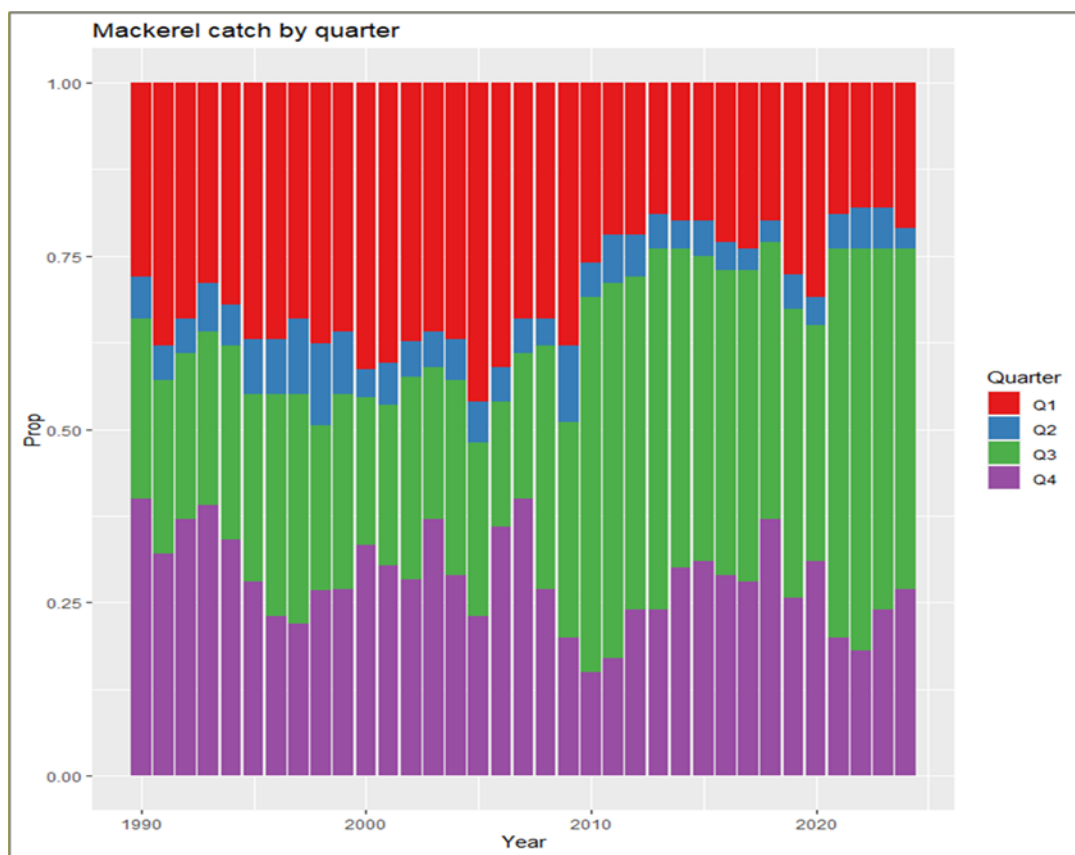


Figure 1. The proportion of mackerel catch by quarter from ICES WGWIDE 2025.

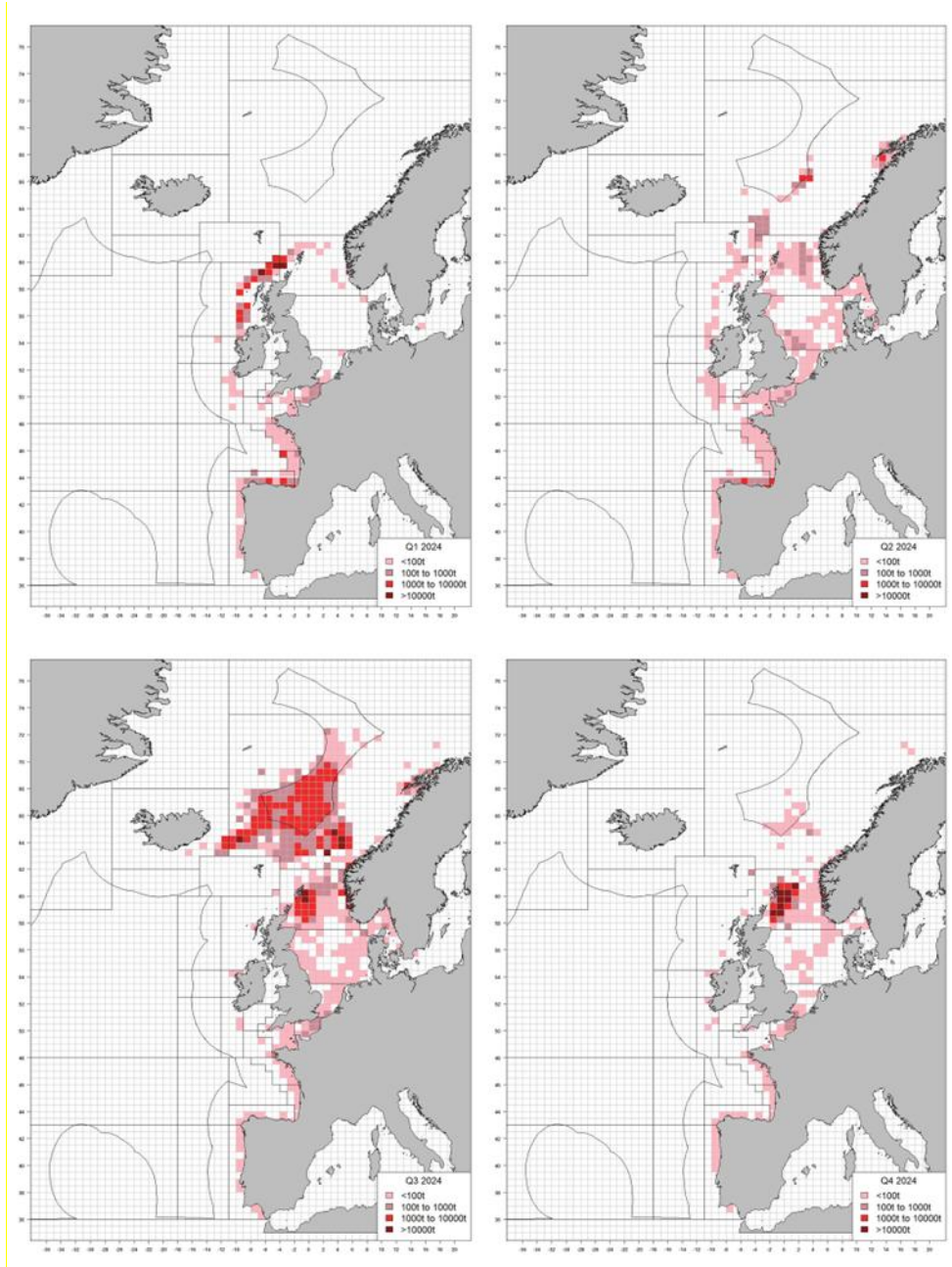


Figure 2. Distribution of the 2024 mackerel catches by quarter from ICES WGWIDE 2025.

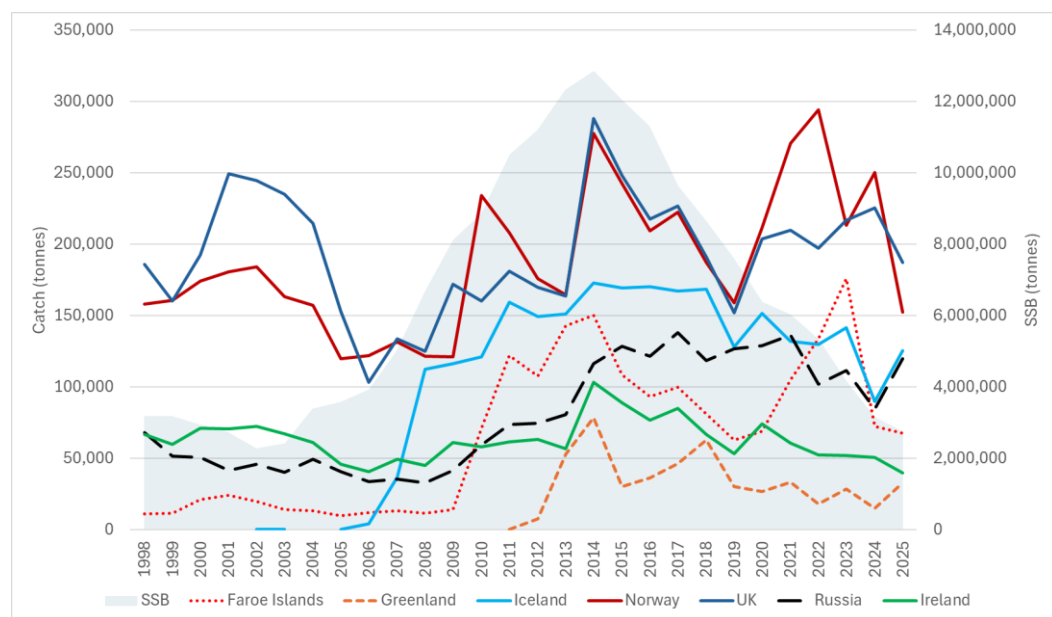


Figure 3. Ireland's mackerel catch 2000-2025 relative to the Faroe Islands, Greenland, Iceland, Norway, UK and Russia. 2025 catch data are estimated based on quotas, national statistics and FishFacts.

Boarfish (boc.27.6-8): The boarfish stock assessment was benchmarked by ICES in 2024, and a new category 1 assessment developed by the Marine Institute. ICES now provides annual advice for the stock and advises that catches in 2026 should be no more than 29,720t a decrease of 22% on 2025. This advice does not reflect the perception of the stock, and the significant decline is due the single 2025 acoustic survey data point, which indicated a 36% (158,000 t) decline in SSB. This level of decline is not supported by the recent catches from the stock and contradicts the other survey indices in the assessment, which indicated an increase in biomass.

The analysis of the 2025 acoustic survey showed a decrease in the density of boarfish shoals, indicating a possible year effect in the survey. Though the survey was retained in the assessment as a valid data point, the KFO requests that the Marine Institute rescutinise the raw survey data to ensure that no errors have been made. If significant differences are found in the 2025 acoustic survey data, then the assessment and advice should be updated with the revised figures as soon as possible. The possibility of an in-year revision to the advice and TAC should also be considered if the 2026 acoustic survey data point returns to a biologically reasonable level, thus indicating that 2025 survey data point was an anomaly. The revised advice would enable additional fishing opportunities to be availed of in Q4 2026. The KFO requests the Minister to liaise with the Commission to develop the official request to ICES to conduct the revisions if supported by the data.

Western Horse Mackerel (hom.27.2a4a5b6a7a-ce-k8): The western horse mackerel assessment was also benchmarked by ICES in 2024, which saw a significant revision to the assessment outputs. The stock is no longer considered to be below the biomass limits and ICES has advised that catches in 2026 should be no more than 74,214t (-1.8%). The KFO supports the ICES advice. Central to the benchmark was the question of stock identification and the development of

genetic evidence that the delineation of the three stocks was inappropriate. Some progress has been made in reallocating the data from division 4a to the western stock. However, there is still the issue of mixing with the North Sea stock in the English Channel where juvenile horse mackerel are found. There is also the wider issue that the southern border of the Western stock extends into the Southern stock area, and the assessment does not account for this. A five-year research plan to address these issues was included in the benchmark report. There has been little progress in implementing this research plan in the 12 months since and the KFO request that the Minister make the resources available to the Marine Institute to implement this plan in Ireland and to collaborate with other national institutes and industry for wider implementation.

As the stock is recovering from a low level it is also necessary to ensure that appropriate management measures are implemented in addition to setting the TAC according to the ICES advice. Such management measures, as specified in articles 7 and 8 of EU Regulation 1380/2013, should include a closed season for horse mackerel to protect spawning aggregations in summer in Irish waters as is the case with boarfish and an increase in the Minimum Conservation Reference Size (MCRS). Seasonal closures would also prevent excess bycatch of boarfish by Member States without boarfish quota. The current MCRS is 15cm, however during the recent benchmark of the western horse mackerel assessment the length at which 50% of the fish reach maturity was determined to be 22 cm. Therefore, the MCRS is too low and should be increased to ensure juvenile horse mackerel are not targeted.

The special conditions appended to the western and North Sea horse mackerel TACs each year that permit 5% transfers of quota between the stocks should not be supported given the state of the North Sea horse mackerel stock.

Blue whiting (whb.27.1-91214): ICES advises that the catches in 2026 should be no more than 851,344t, which is a 41% decrease on the advice for 2025. It is important to note that the current stock assessment only contains a single survey index, which takes place in the same area and at the same time as the main Q1 fishery off the west of Ireland. This survey does not track juvenile blue whiting robustly and as such fails to detect incoming recruitment quickly. Other surveys have been noted to better track age 1 fish incoming to the stock, and it is proposed to attempt include these surveys in the assessment during a planned ICES benchmark assessment in early 2027.

It is worrying to see the catch in 2024 again exceeded the ICES advice. The KFO again stresses that it is imperative that action is taken to stop the unsustainable fishing by non-EU nations. Better management would also allow a large proportion of the stock to grow larger, which would benefit the fishery for human consumption.

The KFO also stress that any new access for Norwegian vessels to parts of EU waters (e.g. the 'Irish Box') should not be considered and only be offered in exchange for payment in fish and based on a revised and limited transfer agreement. Payment should also be required for access to EU waters going beyond the level established pre-Brexit.

Northwest Herring (her.27.6a57bc). ICES advise that catches in 2026 should be no more than 3,269t (+20%). The acoustic survey used to monitor the stock abundance has continued to indicate a declining SSB, however it is known that the survey does not contain the stock to the north, where the herring cross the 4°W line and are then counted as North Sea herring. This issue

needs to be resolved within ICES to ensure the acoustic survey data is representative of the stock. The KFO also notes that the stock is still assessed with a category 3 assessment, and no progress has been made in the past year towards developing a category 1 assessment. The KFO requests that the Minister calls on the Marine Institute to prioritise resolving these issues in 2026 as it is likely that there will a decline in advice in 2027.

The KFO also notes that in setting quotas at EU level, due regard should be taken of the Hague Preference that Ireland has for herring in 6aN. This Hague Preference was successfully invoked in 2024 and the KFO urges the Minister to invoke this Hague again regardless of political opposition from other Member States

6aN Herring (her.27.6aN): ICES advise that catches in 2026 should be no more than 1,501t (-14%). The assessment of this stock is a category 3 assessment and is based only on the autumn spawning 6aN herring. As noted by ICES there is significant evidence that autumn-spawning herring in 6aN are genetically the same population as the North Sea autumn-spawning stock. As such the two assessments should be combined as there is no scientific justification to retain separate assessments. Therefore, the KFO suggests that the Marine Institute request ICES to evaluate the appropriateness of assessing this as a separate stock and push for this to be addressed as part of a future benchmark of the North Sea herring stock.

The KFO also notes that the 2024 catches were dominated by spring spawning herring, from either the 6aN or 6aS,7b-c stocks, which were taken as a non-target bycatch in the quarter 1 mackerel fishery. These catches were included in the assessment, despite the assessment being specifically focussed on the autumn spawning herring. In contrast spring spawning herring are excluded from the genetically split biomass index used in the assessment. Spring spawning herring are typically larger-at-age than autumn spawners and their inclusion in the catch data may affect the length-based indicator. The KFO would like to highlight the apparent contradiction in the inclusion of different data sources and question whether this is appropriate. There is also a need to better understand the dynamics of spring spawning herring in 6.a and the KFO welcomes the Ministers recent decision to allocate a scientific quota in 6aS,7b-c specifically to fill this data gap in March 2026.

The KFO also notes that in setting quotas at EU level, due regard should be taken of the Hague Preference that Ireland has for herring in 6aN. This Hague Preference was successfully invoked in 2024 and the KFO urges the Minister to invoke this Hague again regardless of political opposition from other Member States.

Celtic Sea Herring (her.27.irls): ICES advises that there should be zero catches in 2026. For the purposes of ongoing data collection, it is essential that the monitoring TAC level of 869 t is maintained. It is known and again highlighted by ICES in the advice for 2026 that Celtic Sea herring and adjacent populations migrate to the Irish Sea and mix with the Irish Sea stock. Therefore, the Celtic Sea stock is potentially incurring a high fishing mortality (F) despite there being only a monitoring fishery in the Celtic Sea. Recent genetic analyses of the 2021-2023 Irish Sea Acoustic Survey samples indicated mixing of populations primarily in the area to the west of the Isle of Man, which included immature and mature individuals. The KFO highlight that the assessment and management of this stock and the Irish Sea stock should be reconsidered. The Marine Institute should allocate resources to the genetic stock identification work on these stocks to

show the level of mixing between the two stocks. In this context, the KFO welcomes the revised route of the Celtic Sea Herring Acoustic Survey in 2024 and 2025 and the ongoing genetic sample collection by the Marine Institute.

Irish Sea Herring (her.27.nirs): The Irish Sea herring advice again suffered quality assurance issues this year as ICES released revised catch advice for 2025 in June and then made further changes to that advice sheet in July. The revised advice saw the advised catch in 2025 being revised down from 5,223t to 3,206t due to the correction of errors in the assessment input data and yet another change in assessment model. The 2025 EU and UK TACs have not been adjusted to reflect this revised advice and as such the 2025 catch will exceed the advice as it did in 2024. ICES also advised that catches in 2026 should not exceed 2,935t (-8.5% based on the revised 2025 advice), which is the lowest ever advised catch for this stock.

The KFO reiterates its serious concerns about ICES quality assurance and control procedures in relation to this stock. It is unacceptable that the same problems persist and once again advice has been reissued leading to significant management issues. The KFO request the Minister to discuss the ongoing issues with the Marine Institute and to ask the Marine Institute to raise these concerns to the highest level in ICES. The stock assessment and all input data should undergo a full benchmark before any further advice is issued. ICES should also be asked to conduct a retrospective analysis on the impact of the erroneous assessment of Irish Sea herring and the provision of inflated advice since the last benchmark. As noted above ICES have also now recognised the significant mixing of Celtic Sea herring in the Irish Sea herring surveys and commercial fishery, which needs to be addressed in the assessment. The KFO requests that the Minister calls on the Marine Institute to prioritise this task and focus significant efforts on this.

Atlanto-Scando Herring (her.27.1-24a514a): ICES advises that the catches in 2026 should be no more than 533,914t (+33%). The stock has continued to decline in 2025 and the increase in advice is predicated on two recent stronger than average year classes (2021 and 2022) that are assumed to recruit to the fishable stock in 2026. Until this occurs the forecast state of the stock remains uncertain and as such any increase in advice should be treated with caution.

There also continues to be large-scale overfishing of the stock by non-EU nations as there has been no sharing agreement between the Coastal states for the past ten years and the total catch has exceeded the advice in these years. KFO notes that the EU has a consistent and predictable track record in terms of quota setting and catches for this stock, with a genuine and traditional interest underlined by the fact that it regularly increases its quota through international swaps. It therefore has a legitimate right to the share it currently claims based on previous arrangements and the presence of Atlanto-Scandian herring in its waters. Attempts by Norway and the Faroe Islands to push through a (partial) agreement which excludes the EU are reprehensible and should be rebuked in the highest terms.

1. Demersal Stocks – West of Scotland

Cod in 6a (cod.27.46a7d20): For the last few years, ICES has included the Cod in 6a in the larger North Sea Cod stock assessment in providing advice for the combined Northwestern, Viking and Southern sub-stocks. The 6a cod forms part of the Northwestern sub-stock. The approach taken by ICES has been an unmitigated disaster with ICES first delaying the advice and then providing a

convoluted set of recommendations that make no sense. This is akin to the Irish Sea herring advice from last year that provided different sets of “headline advice”, in and almost “pick and choose” approach. ICES has essentially tied itself in knots around the level of mixing between the sub-stocks. Given the weak state of the southern sub-stock, the advice for the three sub-stocks combined is for zero catch for 2026. It is driven by an ultra-precautionary approach to rebuilding the southern sub-stock, one of three that comprise the overall stock, on the basis that it mixes with the other two. ICES appears to have no clue on the level of mixing between the sub-stocks yet uses mixing of the sub-stocks for the justification of the zero-catch advice.

The KFO also has concerns regarding the splitting of the Northern sub-stock between the North Sea and the West of Scotland. The KFO understands this has been calculated for the last two years on an arbitrary ad hoc basis based on the splitting arrangement in 2023. However, it is important that the proportionality between the two areas does not disadvantage the West of Scotland. Given this will be agreed in the EU-NO-UK negotiations it is important Ireland puts down a firm marker on the setting of the TAC level and the split between West of Scotland and the North Sea.

As highlighted by the KFO on several occasions and now finally recognised in the ICES advice there is an urgent need to develop the genetic stock identification for these cod stocks as ICES implemented the revised stock delineation in the absence of a method to genetically assign fish to their sub-stock of origin. A project is underway to resolve this issue. However, it has not provided any clarity on the definition of the different sub-stocks. The approaches being used are questionable and the Marine Institute should be involved in this work to ensure it is performed to the same high standards set for the Northwest Herring genetic project.

The KFO does not accept that the poor state of the southern sub-stock should have such a profound impact on the fishing opportunities for the Northern sub-stock and finds the ICES approach overly precautionary. Therefore, the KFO supports the Fmsy advice for the Northern sub-stock of xxx should be the basis for fishing opportunities in 2026.

Cod in 6b (cod.27.6b): There is no assessment of Cod in 6b, and ICES provides triennial advice of 11t per year, under its category 6 approach. This advice has no scientific basis and is based on average landings. The landings reflect the low level of quota, and the advice provided bears no reflection to the actual state of the stock. It is also inconsistent with other category 6 stocks (e.g. Northern Prawn), where ICES do not provide catch advice, but merely highlights what it knows and does not know on the stock dynamics. The KFO stresses there is a need for proper data collection and the development of a proper assessment of the Cod in 6b, otherwise this will become a choke species for all fisheries around Rockall. In the short term the KFO highlights there is a need for urgent action required in setting this TAC for 2026 given the significantly increased advice for Rockall haddock. Any opportunity for an increased haddock fishery at Rockall, which would be a welcomed boost for the Irish whitefish fleet, will be negated by a TAC set at an unrealistic level based on limited data.

The KFO supports the setting of a bycatch quota for Rockall cod at a level of 5% of the Rockall haddock quota.

Haddock in 6a (had.27.46a20): ICES advice for Haddock in 4,6a,20 is 108,381t, which is a 4% decrease on the advice for 2025. This stock continues to be fished sustainably with fishing pressure on the stock below F_{MSY} , whilst spawning-stock size is above $MSY B_{trigger}$, B_{PA} , and B_{lim} . The advice is decreasing relative to last year (–3.7%) because of a lack of large incoming year classes and a change in the F_{MSY} reference point.

Haddock in division 6a is assessed as one single stock with the North Sea and Skagerrak (4, 20), with 10% of the TAC being allocated to division 6a. Note that the three areas are considered separately in terms of management. In 2022 and 2023 the TAC was set lower than the full scientific advice due to the North Sea tri-lateral negotiations between the EU, the UK and Norway agreeing a lesser increase for the North Sea which had a knock-on effect of also a lesser increase in 6a. This did not happen in 2025, but the situation should be monitored this year.

The KFO agrees with the ICES advice but requests that 6a is treated differently to the North Sea if the decision in the tri-lateral negotiations is to again revert to a lower increase than advised. The full F_{msy} advice should be applied for the 6a component of the stock.

Haddock in 6b (had.27.6b): As a result of a benchmark in 2024, ICES advised catches in 2025 should be no more than 31,565 tonnes, which was a 674% increase on the 2024 advice. Whilst the development of the science and the increase in catch advice is to be welcomed, the scale of the increase is substantial. For 2026, ICES has advised a 35% reduction in the advice, with total catches of no more than 20,432 tonnes. Given the reduction in fishing opportunities for 2026, the KFO recommends it would be appropriate to implement the full ICES advice for 2026.

Anglerfish in 6a (anf.27.3a46): Following a benchmark in 2024, the perception of this stock has been more positive and for 2025, ICES advised a 211% increase in the catch advice. For 2026, ICES had advised a 1% reduction in catches to no more than 30,358 tonnes. The KFO agrees with this advice but stresses the current split between Areas 4 and 6 should not be changed.

Whiting in 6a (whg.27.6a): ICES advises that the catches in 2026 should be no more than 5,364t, which is a 5% increase on the 2025 advice. The increase in advice is mainly due to an increase in recruitment estimated in 2024 as compared to that assumed in the forecast for that year, resulting in a higher biomass at the beginning of 2026 than was forecast for the beginning of 2025. Close attention should be given to this stock as it is potentially an opportunity to the fisheries off the northwest, which is being under exploited. The proliferation of pots on traditional trawling grounds where whiting and haddock were abundant has essentially closed these areas and has meant uptake of this quota has been low in recent years. The KFO welcome discussions at local level to see if some agreement could be reached to allow whitefish boats to fish for whiting at certain times of the year, while not interfering with pot fisheries in the area.

Demersal Stocks Celtic Sea

Northern Hake (hke.27.3a46-8abd): This stock continues to be fished sustainably with fishing pressure on the stock below F_{MSY} , and spawning-stock size is above $MSY B_{trigger}$, B_{PA} , and B_{lim} . After several years of reductions in catches, the ICES Advice for 2026 is 54,912t, a 5% increase on the 2025 advice. As in previous years, the KFO highlights that efforts should be made to improve the data and decrease the annually increasing uncertainty in the assessment. Noting the continuing issues with the assessment, KFO recommends following the F_{msy} advice.

Celtic Sea Cod (cod.27.7e-k), Whiting (whg.27.7b-ce-k and whg.7d) and Haddock (had.27.7b-k): ICES has advised zero catches for the three main gadoid stocks in the Celtic Sea. All three are in a highly depleted state with spawning stock biomass below B_{lim} , Fishing mortality above F_{msy} and virtually no recruitment into the stocks for several years and in the case of cod, more than 10 years. There is increasing evidence to indicate that climate change is impacting significantly on the recovery of these stocks. As recommended previously, we would strongly suggest that research into the impacts of climate change on fish stocks is intensified.

For the three stocks, the KFO acknowledges the current state of the stocks is poor. However, it is imperative that the Commission's approach of setting by-catch TACs that allow other fisheries continue is maintained to avoid the premature closure of a vast array of sustainable fisheries in the Celtic Sea. The KFO would also recommend, in line with the NWW MAP that remedial technical measures are introduced to protect the remaining stocks. Such measures need to be introduced in fully consultation with the industry, be practical and not result in economic losses in respect of marketable catches of other species that render vessels uneconomic. Additionally, the KFO suggest that Ireland consider the introduction of a temporary tie-up scheme in 2026 to manage quota uptake during the year and would help to reduce fishing pressure.

Specific to Celtic Sea whiting, the KFO points out that in 2025, Ireland was allocated a quota of 7,548 tonnes of whiting in 7d. This quota was essentially useless to Ireland given we have no quota for most stocks in 7d, notably cod, sole and plaice. The KFO urges DAFM to seek a similar quota pool arrangement that pertains for the Spanish in Area 7 included in the Fishing Opportunities Regulation.