

IS&WFPO Submission Regarding Sustainability Impact Assessment of Commission's Proposals for
Fishing Opportunities in 2026 and ICES Advice 2026

The 2025 IS&WFPO SIA has been drafted to comply with Ministerial request so our impact assessment can be received in advance of our meeting with him this coming Wednesday 8th October 2025, this is earlier than previous submissions and there is still outstanding ICES advice on key stocks such as Nephrops. Fishing Opportunities are now influenced following Brexit and are contingent on agreement in bilateral discussions between EU / UK.

The statement below is now more relevant than any year preceding this coming one 2026

“Thanks to the investments made by fishers and national administrations and the commitment from the European Parliament, Council and Commission to manage fisheries responsibly, fishing has become more sustainable and far fewer stocks are now overfished in the EU. In 2003, most stocks of interest to the EU were heavily overfished and the median fishing mortality in the Northeast Atlantic was 1.68 FMSY. The rate has since fallen, reaching the lowest value in 2021 at 0.76”

We wish to emphasise to Minister Dooley following the terrible TCA deal negotiated for Ireland that has been extended for another 12 years locking in future disproportionate burden sharing. Our catching sector are going to suffer cumulative losses amounting to 800 million Euro this is incredible when the access we paid so dearly for is now under serious threat under the UK introduction of 43 Marine protected Areas that in an underhand way denies the very access, we are committed to paying for under the TCA extension for 12 more years.

It is important to remember all Member States are required under article 22 of the CFP Regulation to present Action Plans to address any imbalance between fishing capacity and our opportunities, following recent years losses and despite the decommissioning of 39 white fish vessels this imbalance has never been so far apart, following the reduction of our income, which is decreasing this year from 0 TACs in key demersal stocks such as Cod, whiting and Haddock in the Celtic Sea Haddock our fishing opportunities will be dramatically affected in 2026.

The sector's socioeconomic performance may be for many, unviable, due to the huge personal investment in new vessels and investment in new technologies and fishing gear to meet the requirements of the landing obligation implementation Regulation.

It goes without saying following Brexit, these bilateral consultations with the UK have become a key step towards setting Fishing Opportunities for the 75 shared fish stocks, whose majority are of interest to Ireland.

The EU-UK Trade and Cooperation Agreement which led to the creation of the Specialised Committee on Fisheries (SCF) which addresses issues including quota swaps, non-quota species and technical measures is an important key engagement structure for the sustainable management of our coastal states fishing resources. For as they manage our shared waters, we hope us as stakeholders do show the importance EU & UK PO's interaction and engagement which also plays in assisting with acquiring key shared species during the year so we can manage our fleets activities and in doing so secure the most favourable of opportunities to remain competitive and viable as much as possible throughout the Calander year.

IS&WFPO wish to highlight a key objective of the CFP the one for economic, social and employment benefits, and contributing to the availability of food supplies as stated in Article 2.1 of the CFP.

The Commission has produced its communication to the European Parliament and the Council;
<https://op.europa.eu/en/publication-detail/-/publication/91b1d5c9-42b5-11f0-b9f2-01aa75ed71a1/language-en>

This year they are moving towards a more sustainable fishing in the EU, level playing pitch, quoting a competitive and economically viable fishing sector relies upon healthy fish stocks and healthy Oceans.

The annual Communication provides an overview of the state of the stocks based on scientific advice and explains the procedure for establishing fishing opportunities. The International Council for the Exploration of the Sea (ICES) who has provided its annual advice on a number of fish stocks covered by the proposal where data gathered under the framework directive was deemed to be insufficient, their advice is to be precautionary has led to retrospective bias cutting important **Demersal and Pelagic stocks such as Haddock in Rockall – 35%, Haddock in the Irish Sea -30%, Monk 6a – 12%, Monk Celtic Sea – 3%, Saithe in 6 – 24%, Sole in 7a – 10.5 %Whiting 7a gone from zero TAC to 200 tonnes for 2026, means that the TAC for 2026 is 72% lower than the bycatch TAC agreed in the previous years when ICES gave zero catch advice. Plaice 7d a 56% reduction, 13.9% reduction for sole in divisions 7fg, Horse Mackerel -2%, Boarfish -22%, and Blue whiting -41% this on top of the collapse of the Northeast Mackerel – 70% by the reckless and IUU actions of Norway Faroe Islands Iceland and UK.**

The work and sacrifices of our Industry following ICES advice are undermined by other coastal states reckless and greedy actions of fishing above the TAC set for key stocks such as Mackerel that seem to be ignored by the same Commission by not labelling this fish as IUU caught Mackerel but instead allow them access to our markets & waters to prosecute other species in quantities far exceeding our fishermen while we continue to agree access agreements to other stocks predominately found in our waters such as Blue Whiting when we are given from a TAC of over 851,344t only est 36,000t.

Demersal Stocks Celtic Sea

Northern Hake (hke.27.3a46-8abd): The ICES Advice for 2026 is 54,912t,

4% increase on 2025, advice has changed with the concentration of the assessment focusing on females, we have raised with ICES this stock covers a wide distribution area and changes in the spatial distribution of the stock may increase the uncertainties in the assessment but because there is no survey available that takes this into account, Efforts should be made to improve the data and decrease the annually increasing uncertainty in their assessment that leads to lower TAC despite evidence this stock is healthy and sustainably fished.

Cod, Celtic Sea (cod.27.7e-k): The ICES advice is for zero catch again in 2026.

We advocate the Commission's approach of setting low-level TACs for by-catches only is maintained as part of the 2026 TACs and Quota to avoid the premature closure of a vast array of sustainable fisheries. We also advocate a rebuilding plan should be devised.

The NWWAC noted in its 9th May 2023 letter to the Commission that the ICES assessment for cod stocks in the Celtic Seas eco-region does not take into account the proven negative impact of rising sea temperatures on Cod reproduction and productivity. It recommended that DG MARE request ICES to consider in the assessment how ocean warming is affecting cod survivability in the Celtic Seas habitat.

Whiting, Celtic Sea (whg.27.7b-ce-k): The ICES advice for 2026 is for zero catch.

There is an urgent need to improve the biological data available for this and other whiting stock assessments by undertaking stock identification research to understand the potential mixing between the stocks in 7d.

Haddock, Celtic Sea (had.27.7b-k): ICES advises that the catches in 2024 should be zero.

Despite our fishermen implementing technical measures to avoid smaller fish advised by doing so they could catch adults when they are older and bigger now contradicts this previous advice coupling this with the zero catch advice for cod and whiting will have a significant impact on the Irish vessels operating in this area impacting on their ability to remain viable. These socio-economic consequences should be taken into account in deciding on the by-catch provision as is required under the CFP for not to do so will mean a large section of our demersal fleet capacity will not be in line with the opportunities available to them.

Anglerfish, Celtic Sea (ank.27.78abd and mon.27.78abd): Anglerfish in area 7 are assessed as separate species with separate advice for each but are managed under a single TAC (ANF/07). The combined ICES advice is showing a 4.2% decrease which is unwelcome. We feel this is not enough to address the imbalance within the demersal sectors of our fleet.

Plaice, Celtic Sea (ple.27.7fg, ple.27.7h-k, ple.27.7bc): There was no new advice for Plaice in 7fg or 7h-k, which last year received biennial advice.

Demersal Stocks Irish Sea

Whiting, Irish Sea (whg.27.7a): The ICES advice is for 200 t in 2026.

Cod, Irish Sea (cod.27.7a): The ICES advice for 7a Cod 0 catch.

Stock identification and a clear understanding of the potential mixing of with cod in 6a and cod in the Celtic Sea needs to be investigated if proper management and rebuilding measures can be developed to see if these stocks can be recovered. All the while taking in consideration the impact of climate change and warming sea temperatures that have a detrimental effect on the spawning cycle for this species.

Haddock, Irish Sea (had.27.7a): The ICES advice is for another reduction -30% reduction in catch to 1,331t in 2026. Fishing pressure is declining and has been below FMSY since 2012 but shows no impact to the overall recovery to the abundance which was at the highest in the time series.

Pelagic Stocks

Mackerel (mac.27.nea): ICES advises that catches in 2026 should be no more than 174,357t. Norway and the Faroe Islands decided again last year to unilaterally increase their mackerel quotas compared to levels previously agreed in past Coastal States mackerel sharing arrangement and facilitated by the UK to catch this IUU fish taking a payment in stolen fish of around 30,000 t. this is the fourth successive year of cuts to this stock driven by the theft of this shared stock by four rogue coastal states which will require action to address the imbalance this coupled with the other losses will undoubtedly have on this segment of our fleet.

Northwest Herring (her.27.6a57bc). ICES advises that catches for Northwest Herring (her.27.6a57bc) in 2026 should be no more than est 3,000t.

Celtic Sea Herring (her.27.irls): ICES advises that there should be zero catches in 2026. It is known that Celtic Sea herring and adjacent populations migrate to the Irish Sea and mix with the Irish Sea stock. this stock is potentially incurring a high F despite there being only a monitoring fishery in the Celtic Sea. Genetic analyses of the Irish Sea Acoustic Survey samples indicated mixing of populations primarily in the area to the west of the Isle of Man. This included immature and mature individuals.

Irish Sea Herring (her.27.nirs): is now reduced to tens of tons follow the transfer of 22% to the UK Brexit deal showing the burden we had to carry in the Brexit TCA deal copper fastened for another 12 years.

Boarfish (boc.27.6-8): ICES advises that catches should be cut by 22% reducing the TAC to 29,720t in 2026. The stock is estimated to have been increasing since 2016 with slightly increased recruitment seen in the acoustic and IBTS surveys in recent years but not enough Biomass has been seen in the traditional tracked surveys. The stock is now estimated to be still close its highest biomass level since 2012 but is in slight decline. This stock distribution has spread from our waters to our coastal state's neighbours but despite this the advice is to cut the TAC.

Western Horse Mackerel (hom.27.2a4a5b6a7a-ce-k8): ICES advises that there should be a cut of 1.8% to a figure of 74,214t.

Atlanto-Scando Herring (her.27.1-24a514a): ICES advises that the catches in 2026 should be 533,914t, which is a 33 % increase on the 2023 advice. This significant decrease is due to a lack of recruitment in the stock since 2016 and large-scale overfishing by non-EU nations. There has been no sharing agreement by the Coastal states for the past ten years and as such the total catch has exceeded the advice in these years. The Minister should take account of the changes in such species when it comes to the coastal state sharing arrangements, here we see the stock used to gain access to our increasing biomass of blue whiting species, so ASH depleting and the later increasing.

Sprat (spr.27.67a-cf-k): ICES advises that the catch should be no more than 2,240t. There is no assessment for this stock largely due to the fact that the stock structure of sprat populations in this ecoregion is not clear. ICES is unable to identify appropriate assessment units and yet still manage to give advice?

Sprat in this area, and the relationship with sprat in divisions 7.d and 7.e is also unknown. We learned through our attendance at the Maritime and Fisheries committee a genetic stock identification project is underway to resolve these issues.

Minister following the IS&WFPO attendance at the Maritime and Fisheries committee feel it is discriminatory to take away a traditional fishery from fisherman with track record based solely on the size of their vessel.

Like DEJA VEU The final paragraph of our submission has to address the reduction in opportunities and TAC the Demersal and Pelagic sectors will suffer in 2026, we ask Minister to look at the table we requested showing the decrease in our opportunities since 2019 to show the changes this will undoubtedly mean in lost financial opportunities for the various fleet segments in 2026.

What our Organisation cannot understand is how you who is under the CFP regulation are required under article 22 of the CFP Regulation to present Action Plans to address any imbalance between fishing capacity and our opportunities can take away opportunities based on studies carried out many years ago that are based on data that has been completely changed and is no way near the realities of opportunities vessels are going to be reduced to in 2026.

We are asking for the opportunities the MI and BIM officials identified in their report you relied upon to make your decision to exclude vessels over 18m from 6 miles outside the baselines.

These vessels over 18m are surely entitled to learn from you and your department what other opportunities they will have to “transition”, coupled with the economic report that validates such a conclusion.

The IS&WFPO has drafted a management proposal for two key species to many of our members Sprat and BSA brown and Spider Crab.

The Seafood alliance support the implementation of management plans for important species that are a key part of our fishermen’s operations.

On behalf of the members of the IS&WFPO can we request a meeting with you, your Department Officials to seek some engagement on these proposals.

We do wish to acknowledge through our request during a recent Quota Management Committee meeting our request for information was provided and this is shown below.

However, it is not clear if the figures provide are those that represent the TAC we receive following the December council or the figures that represent our end of year opportunities that include carry over and swaps.

Despite this it provide a clear picture of the dramatic changes in our Demersal and Pelagic opportunities in the past seven year pre and post Brexit.

The MI have provided the below table of the Irish quota in tonnes (after Hague preferences etc). They have advised that these changes are due to a combination of reductions in quota shares after Brexit, changes in the scientific advice and changes in the implementation of the scientific advice.

TacCode	2019	2020	2021	2022	2023	2024	2025
ALB/AN05N	2854.3	2891.01	3174.03	3316.79	3398.46	4310.57	4603.57
ALF/3X14-	8	8	7	7	5	5	5
ANF/56-14	1145	797	562	439	343	334	890
ANF/7	2501	2675	2775	2977	3283	3430	3367
ARU/3A4-C	8	8	5	5	5	5	8
ARU/567	329	263	262	821	573	593	635
BLI/24-	4	2	2	2	2	2	2
BLI/5B67-	33	31	32	30	30	29	30
BOR/678-	15086	13235	13234	15749	15749	18899	26462
BSF/56712-	71	71	55	55	52	39	39
BSH/AN05N	0	1	0.96	0.96	0.96	0.72	0.72
COD/07A.	530	170	104	104	83	82	82
COD/1N2AB.	322	322	290	290	258	282	290
COD/5BE6A	385	284	243	219	188	185	131
COD/5W6-14	16	16	16	14	14	12	11

COD/7XAD34	650	461	422	338	336	335	335
DGS/15X14	53	53	48	47	1871	1887	2325
GHL/2A-C46	14	14	29	29	29	29	20
HAD/07A.	1619	1366	1322	1171	1003	839	692
HAD/5BC6A.	528	651	648	682	887	1329	1304
HAD/6B1214	824	824	570	385	264	255	622
HAD/7X7A34	1851	2413	2959	2920	2275	1516	1182
HER/07A/MM	1795	2099	808	719	439	218	52
HER/1/2-	3399	3035	3370	3098	2646	2019	2080
HER/5B6ANB	630	526	478	470	161	189	403
HER/6AS7BC	1482	1236	1236	1236	1720	2064	2600
HER/7G-K.	4097	750	750	750	750	750	750
HKE/571214	4400	3493	2989	2383	2485	2169	1730
JAX/2A-14	30306	17726	17561	15737	3213	3182	16406
JAX/4BC7D	376	334	330	202	194	198	16
LEZ/56-14	749	764	600	627	605	645	614
LEZ/7	3001	3101	2844	2827	3297	3360	3038
LIN/6X14.	898	898	1301	1059	865	756	752
MAC/2CX14-	55313	78052	60847	54992	52385	47560	39914
NEP/5BC6.	204	215	202	160	179	177	184
NEP/7	7296	6201	6102	5682	6027	6095	5313
PLE/07A.	1499	1442	1069	1031	767	570	396
PLE/56-14	261	261	248	248	224	224	224
PLE/7BC.	63	63	15	15	17	13	13
PLE/7FG.	243	255	240	237	147	142	40
PLE/7HJK.	47	30	28	47	55	54	53
POK/552064	1491	1491	1493	1404	1404	863	690
POK/56-14	418	401	369	353	357	365	366
POL/56-14	56	34	26	22	18	13	11
POL/7	929	929	680	572	453	58	48
RHG/5B67-	1.66	1.66	1.5	1.5	1.5	1.08	0.86
RHG/8X14-	0.03	0.03	0.02	0.02	0.02	0.03	0.02
RJE/07E.						2	2
RJE/7FG.	25	25	12	12	8	7	8
RJU/7DE.	27	27	25	25	332	405	381
RNG/5B67-	166	166	150	150	150	108	86
RNG/8X14-	3	3	2	2	2	3	2
SBR/678-	3	3	3	3	3	3	3
SOL/07A.	74	77	104	105	94	95	94
SOL/56-14	46	46	46	46	46	46	46
SOL/7BC.	36	36					