



SUSTAINABILITY IMPACT ASSESSMENT – IFPO POSITION PAPER ON FISHING OPPORTUNITIES AND COASTAL STATES NEGOTIATIONS FOR STOCKS FOR 2026

To: Minister Timmy Dooley, Minister of State at the Department of Agriculture, Food and the Marine, Agriculture House, Kildare Street, Dublin 2

Re Seafood Sector - Sustainability Considerations and Recommendations

Date: October 3rd 2025

1 Overview

A key sustainability concern is the recently published ICES advice which recommends a dire year ahead for EU pelagic fishers in key stocks:

Mackerel	-70 %
Blue whiting	-41%
Boarfish	-22%
Horse Mackerel	- 2%

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

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

The key **economic stock** – mackerel – is impacted significantly due years of **systematic** overfishing and a systemic quota grab by certain coastal states Norway, The Faroe Islands, Iceland and The Russian Federation The Irish industry has long called for sanctions to address the **IUU style behaviour** of certain Northern Coastal States in the excessive, unjustified and unilateral self-awarding of quota coupled with excessive interannual transfers. This is simply an irresponsible quota grab impacting on Irish coastal communities that depend on this fishery. This has particular significance for Ireland which has a 50.89 % share of the western mackerel component.

To put the seriousness of the **pelagic** situation into perspective, for the pelagic catching sector including the 23 RSW vessels and 14 Tier 1 vessels, the loss of income is likely be more than €66 million compared to 2024, with the jobs of the approximate 200 fishermen employed on these vessels at threat. The potential reduction in raw material available to the pelagic 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.



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 the **remaining 162 whitefish** vessels greater than 12m in the Irish fleet. These vessels collectively have **landings of €140 million** and employ approximately 650 crew. Despite the removal of 39 vessels under the most recent decommissioning scheme, the remaining vessels have struggled to survive on reduced quotas following from Brexit as well as successive cuts in fishing opportunities reflecting negative scientific advice. The whitefish fleet has become increasingly reliant on **prawn quota** to remain viable, with 50-60% of the remaining whitefish vessels now deriving most of their income from prawns. Negative scientific advice for the prawn stocks for 2026 coupled with the further reductions resulting from the ICES advice could see the fleet reduce by as much as 30-40% in 2026.

It is clear the situation the industry is facing into in 2026 is **unprecedented**. *Business as usual* is not an option and therefore we need to work collectively to urgently assess the potential worst-case scenarios - and develop a package of measures (**at National and EU Level**) to assist the industry survive the deepening crisis that is unfolding.

a) NATIONAL INITIATIVES

As part of a comprehensive resilience and package, we would suggest the following measures are considered:

- a. **Hague Preferences** – maintain a high -level political support to ensure delivery of all Hague Preferences at the December Fisheries Council. The process of invoking these entitlements for mackerel and black sole will be robustly challenged by other Member States at this year's December Council.
- b. **Impact assessment:** BIM to conduct an impact assessment based on a range of scenarios to evaluate the short, medium and long-term economic impacts of the prospective cuts on the pelagic and whitefish sectors.
- c. **Emergency short-term financial support** - budget 2026 needs to provide for a commitment to put in place a support measures framework for the fish producing and fish processing sector in 2026, due to the adverse scientific advice provided for in 2026, the Government will in the course of Q4 2025 and Q1 provide for schemes to be examined and drafted to aid and assist these sectors to include
- d. **Pelagic Catching Sector** - support to protect the viability of 37 vessels reliant on pelagic stocks supporting around 200 jobs.
- e. **Whitefish and prawn fleets** – approx. 160 vessels to be supported in the form of temporary tie-up aid with an integrated support mechanism for processing sector than dependent on these supplies from the 160 vessels.



- f. **Processing sector** – support measures to protect the viability of 7 pelagic fish processing units employing over 600 people.
- 4 **Fleet Capacity Balance**- assessment of a whitefish res-structuring programme to reduce balance capacity with available fishing opportunities.
- 5 **Rockall access** – urgently reengage with UK and Scottish to reinstate access to traditional fishing grounds
- 6 **Licencing Policy** - full review of the current licensing policy to identify changes that could be made to assist the pelagic fleet to maintain viability, including the consolidation of licences and quota allocations.
- 7 **Research and innovation** – implement a scientific quota programme for the Nephrops fishery to underpin and facilitate additional survey work in area 7 – FU16

B) EU & COASTAL STATE INITIATIVES.

The EU Commission has the competency to negotiate arrangements on behalf of Member States and High-level political engagement is required to address the following

- 1 **Third Country Access** - access for Norwegian vessels to parts of EU waters should be blocked and only be offered in exchange for meaningful payment in fish. It should also be conditional on a successful conclusion of relevant Coastal States mackerel sharing arrangements
- 2 **Market Access and Trade Measures** - access to the European market conditional on compliance with the rules. The highest priority must be given to full support for European Commission's legislative proposal (revision of **1026/2012**) on identifying and sanctioning non-EU countries allowing unsustainable fishing practices to pressurise rogue Coastal States to reach an agreement on comprehensive sharing arrangements for the shared (widely distributed stocks) of mackerel and blue whiting, based on genuine historic track records and interest.
- 3 **Tri Lateral Process** -call out the three-year deal that legitimises continuous overfishing by some on the basis of excessive, inflated unilateral quotas – inflated quotas that stray far from the shares applicable under the last sharing arrangement – and as per the EAPO / PELAC /NEPWG recommendation of **October 4th, 2024**

Sadly, the UK has swapped in 'stolen goods', namely part of the artificially increased Norwegian mackerel quota, for the second year in a row, in exchange for Norwegian access to UK waters. This leaves the EU as the only Coastal State showing restraint through sticking to the previous sharing arrangement. Nonetheless, the EU should continue to work constructively with the UK, reflecting the ties between the EU and the UK through their Trade and Cooperation Agreement (TCA).



4 **EU Iceland** -secure a meaningful dividend for Ireland in the currency of choice from any EU Commission negotiated annual access deals

5 **Boarfish -ICES and Scientific Survey** – negotiate with the Commission and ICES to allow for an in-year update to the advice and TAC if the 2026 acoustic survey aligns with historical norms—confirming the 2025 data as an outlier -and to be credible and reflecting stakeholder experience. This initiative key to delivery of robust science to underpin expanded fishing opportunities in Q4 2026.

We look forward to constructive dialogue with you on **Wednesday next October 8th** to discuss these issues, while stressing the gravity of the situation facing the industry.

Yours sincerely,

Aodh O Domhnaill CEO, The Irish Fish Producers Organisation Limited (IFPO).

Tel +353 74 97 41468

Mobile +353 87 711 88 00

aodh.odonnell@ifpo.ie www.ifpo.ie