# **ISEFPO**

# Sustainability Impact Assessment

# Fishing Opportunities For 2026

Since 2003 we have witnessed a very much improved situation in regard to stocks in the NE Atlantic region as pointed to in the European Commission's report "Sustainable Fishing in The EU. Which states:

"In 2003, most stocks (70%) were overfished and the average (median) rate of fishing was 53%above MSY. The situation improved rapidly thanks to action to restrict fishing effort, improve monitoring and to set total allowable catches (TACs) in line with scientific advice. By 2022, the average rate of fishing was well within the sustainable rate and only 30% of stocks were overfished. The reduction in fishing pressure in 2020 and 2021 coincided with the start of COVID-19 restrictions. Overall fish stock biomass increased by some 37% over the period 2003-2022."

This progress has been made in partnership with the fishing industry, which has made considerable sacrifices to achieve this progress towards Fmsy. The fishing industry braodly supports the use of msy indicators as a means of guidance to the fishing of stocks sustainably. However factors outside of the control of the fishing industry whether environmental or other often have an impact on the advice being produced.

The Common Fisheries Policy review group in it's final report in July 2022 made a number of recommendations to have the imbalance in Irelands share in stocks of particular importance redressed and we must now follow through with results.

A level playing field is a very important component of being a member of the European Union and to this end the upcoming evaluation of the CFP must produce reform to adjust for the unfair allocations that Ireland has been allocated in some vitally important fish stocks. Relative stability was the backbone of the CFP for forty years when fishing quotas were being allocated in Irish waters, but it was so easily disregarded when the UK were asking for quota as payment for access in the Brexit negotiations.

The advice for fishing opportunities for 2026 for both white fish and pelagic stocks is a hammer blow to the Irish fishing and processing industries, with zero catch advice for six white fish stocks and low or declining opportunities in many others. This has resulted in increased pressure being applied to the Nephrops fishery. The catch advice for nephrops will be issued in October and any reduction here would make managing this fishery almost impossible.

Considering the pressure our target fisheries are currently experiencing we will have to consider a reduction in fishing effort for 2026 and possibly beyond. This will require funding to allow the fleet to survive through the challenges which an effort

reduction will imply. The introduction of a rolling tie up scheme which would pay vessels to tie up for a period of time during 2026 should be considered for the white fish, nephrops fleets during 2026. This action would conserve quota for the fleet and

for the remainder of the year. A structure could be set up to divide the fleet by size, type and target species to allow processors have an uninterrupted supply of produce, while the vessels would have more quota for the months when they are fishing. This could also be used to avoid certain stocks during the spawning period.

# Stocks of particular interest to the ISEFPO.

#### Celtic Sea

| CELTIC SEA STOCKS 2026 |                        |                      |                      |              |                   |                          |                        |                        |              |              |
|------------------------|------------------------|----------------------|----------------------|--------------|-------------------|--------------------------|------------------------|------------------------|--------------|--------------|
| SPECIES                | ICES AREA              | TAC 2025<br>(tonnes) | TAC 2026<br>(tonnes) | TAC Change % | Quota Change<br>% | Quota Change<br>(tonnes) | Quota 2025<br>(tonnes) | Quota 2026<br>(tonnes) | Value 2025   | Value 2026   |
| Anglerfish             | 7                      | 47,559               | 46,215               | -2.8%        | -2.8%             | -95                      | 3,367                  | 3,272                  | €15,607,511  | €15,165,518  |
| Cod                    | 7b, 7c, 7e-k, 8, 9 10  | 644                  | 644                  | 0.0%         | -0.2%             | -1                       | 335                    | 334                    | €1,724,954   | €1,722,190   |
| Haddock                | 7b-k, 8, 9 10          | 6,353                | 0                    | -100.0%      | -100.0%           | -1,182                   | 1,182                  | 0                      | €2,592,336   | €0           |
| Hake                   | 6 7;5b; 12 14          | 32,479               | 30,837               | -5.1%        | -5.1%             | -88                      | 1,730                  | 1,642                  | €6,793,827   | €6,449,750   |
| Megrim                 | 7                      | 20,030               | 20,030               | 0.0%         | 0.0%              | 0                        | 3,038                  | 3,038                  | €11,041,587  | €11,042,257  |
| Pollack                | 7                      | 689                  | 3,222                | 368%         | 366%              | 176                      | 48                     | 224                    | €204,342     | €951,545     |
| Saithe                 | 7, 8, 9 10 Nor S 62° N | 1,220                | 146                  | -88%         | -88%              | -607                     | 690                    | 83                     | €1,205,003   | €144,386     |
| Common sole            | 7f 7g                  | 1,149                | 989                  | -13.9%       | -17.5%            | -6                       | 33                     | 27                     | €508,472     | €419,686     |
| Whiting                | 7b-k                   | 32,374               | 32,374               | 0.0%         | -0.1%             | -10                      | 8,759                  | 8,749                  | €15,646,823  | €15,629,479  |
| Norway lobster         | 7                      | 16,689               | 16,689               | 0.0%         | 0.0%              | -1                       | 5,313                  | 5,312                  | €54,931,877  | €54,921,011  |
| Common sole            | 7f 7g                  | 1,149                | 989                  | -13.9%       | -17.5%            | -6                       | 33                     | 27                     | €508,472     | €419,686     |
| Common sole            | 7h, 7j 7k              | 170                  | 170                  | 0.0%         | -0.7%             | -1                       | 77                     | 76                     | €1,186,435   | €1,178,333   |
| Plaice                 | 7b 7c                  | 15                   | 15                   | 0.0%         | 3.8%              | 1                        | 13                     | 14                     | €33,700      | €34,996      |
| Plaice                 | 7h, 7j 7k              | 130                  | 130                  | 0.0%         | 3.0%              | 2                        | 53                     | 55                     | €137,393     | €141,582     |
| Plaice                 | 7f 7g                  | 114                  | 114                  | 0.0%         | -2.2%             | -1                       | 40                     | 39                     | €103,692     | €101,445     |
| Sub-total              |                        | 160,764              | 152,564              | -5.1%        | -7.4%             | -1,819                   | 24,711                 | 22,892                 | €112,226,426 | €108,321,862 |

Figure 1. shows a reduction of € 3,904,564 in fishing opportunities for 2026.

# Sole 7f+g

The Advice for 2026 for sole 7fg proposes a 14% reduction on 2025 this comes after cuts of 9.3% and 5.3% in the previous two years. The stock is in good status, recruitment is high and F is estimated to be marginally above F Msy. The advice is far removed from the reality being experienced by fishermen on the ground where our vessels are experiencing great difficulty in avoiding sole in 7fg even as a bicatch. The ISEFPO has serious concerns around this advice and the uptake in 2025 where the Irish quota was exhausted before the end of May. This has had a serious negative impact on our ability to fish for other stocks such as monk and megrim, both of which have been staples of the Irish fishing fleet for many years. From a catch advice of 989 tonnes, Ireland will receive approximately 27 tonnes for 2025. Ireland currently has a miniscule 3% share of this stock and a 4.4% share of EU quota, which is causing difficulties for our vessels fishing in this area.

The critical point to be made here is that if we try to utilise our opportunity in stocks such as megrim and monk, we cannot do this without catching a percentage of sole in the process and therefore sole in 7fg puts our vessels in a situation where they cannot avoid being choked.

The ISEFPO understands that Ireland has a Hague preference for Sole 7fg although we do not invoke this option. The CFP review group in its report in 2022 made certain recommendations which could increase Ireland's share of this stock including the invoking of the Hague Preference which would give Ireland an additional quota of 83 tonnes. At December council this year Ireland must invoke its Hague preference for Sole 7fg for which our evidence to date has shown we are fully entitled, as it is indefensible that Ireland has such a minute share in this valuable and unavoidable fishery.

# Sole 7b-c and Sole 7h-k

As in previous years the continual 20% cut in each assessment cycle for these stocks will ultimately result in a TAC close to zero. Catches have been stable since around 2005 and any reduction on previous years is most likely as a result of reduced effort.

ICES has advised that the precautionary buffer for data deficient stocks be applied to both of these TAC areas for sole. The reasoning behind this is ambiguous and must be questioned. Both TACs have been very low in these areas, however it is an important bi catch quota which allows other fisheries to continue and a zero catch option will have the effect of choking other commercially important fisheries. If the precautionary buffer has been applied previously to either or both of these stocks then it should not be applied again as only one buffer is required to protect the stock. Any consideration of area misreporting must be supported by data to inform an accurate assessment and as the only data available is landings data this has to be considered as accurate.

# Cod e-k

Although the ICES advice is for a zero catch, a bi catch TAC must be applied to ensure fisheries with mixed catches do not become choked. Cod is no longer a target species in the Celtic sea and is only seen in very small quantities in other fisheries, both catches and recruitment appear to have fallen dramatically in recent years and factors other than fishing may be putting pressure on this stock.

# Haddock 7 b-k

The rapid decline in the SSB for haddock in this area due to extremely low recruitment in the last number of years has ultimately resulted in a zero catch advice for 2026. If the TAC follows the advice the loss to Irish fishermen will be €2,447,871 In 2026

# Whiting b-c / e-k

Whiting 7b-c and 7e-k have advice for zero catches for 2025 and is now a bi-catch quota which includes 7d in the management area. The changes made to these

management areas in 2024 do not present a solution for Irish fishermen and would appear to have been devised to avoid Ireland invoking its Hague preference on whiting e-k, which would give Ireland a better share of the bi-catch quota that was eventually applied for 2025 If ICES advice was followed and the two stock areas were separated.

The three stocks outlined above require immediate remedial measures to encourage the rebuilding of these valuable stocks for Irish fishermen.

# Plaice 7f+g

No advice yet though a reduction in the advice would cause us huge difficulty if it follows through in the TAC. Looking at the ICES advice from previous years the priority here should be to reduce the level of discards.

### Monk 7

The advice for monk in area 7 is for a -3% cut which on the surface shows stability in this stock which is composed of both white and black bellied monk. Small adjustments in this TAC can have significant implications for Irish fishermen as this is an important fishery in Ireland and as our share of the EU quota for monk in 7 is only 9% we are forced into seeking out swaps to support this fishery during the year. We should explore some mechanism for rebalancing of this stock as there are member states underutilising their quota.

### Hake Northern Stock

There has been an upward revision of the SSB in the new assessment model and the advice this year is for an increase of 4.7%. This is a positive sign for the stock that the reduction in bio-mass has stabilised. However from an economic perspective this stock has seen significant reductions in the past two years and we do require significant swaps of hake throughout the year to maintain a viable fishery. Considering the cuts to the Mackerel stocks our most valuable currency not be available in the future.

# Nephrops 7

Although the advice will not be issued until the end of October Nephrops is Ireland's most commercially important demersal fishery and the possibility of any reduction in TAC here particularly in FU16 has serious implications for the viability of the fleet. Ireland took a permanent 14% reduction to our Nephrops quota as a transfer to the UK in the TCA. This reduction will continue to have a negative impact on the fishery in 2026 both in the wider area 7 and in the porcupine FU 16. The Irish fleet catches almost 100% of its Nephrops quota allocation every year due to our proximity to the source and reduced opportunities in many whitefish stocks. In 2026 this fishery relied heavily on swaps to maintain a viable fishery.

The annual surveys gathering data in the Porcupine bank area, being undertaken by the Irish industry in partnership with the Marine Institute are showing results which will support an extended summer closure for all fleets fishing nephrops on the Porcupine bank. The ISEFPO is asking that this extended summer closure in line with advice from the Marine Institute should be tabled for introduction in 2026 to protect the spawning nephrops stock in the Porcupine area. This fishery requires protection from the extraction of large quantities of small females during the summer months.

### Pollack 6 and 7

For 2026 Ireland should come out with a quota of 224 tonnes as a catch advice of no more than 3222 tonnes has been given by ICES. This includes estimates of catches in recreational fisheries which are now part of this quota and will require a balanced sharing mechanism.

# Irish Sea

| IRISH SEA STOCKS 2026 |           |                      |                      |              |                   |                          |                        |                        |             |             |
|-----------------------|-----------|----------------------|----------------------|--------------|-------------------|--------------------------|------------------------|------------------------|-------------|-------------|
| SPECIES               | ICES AREA | TAC 2025<br>(tonnes) | TAC 2026<br>(tonnes) | TAC Change % | Quota Change<br>% | Quota Change<br>(tonnes) | Quota 2025<br>(tonnes) | Quota 2026<br>(tonnes) | Value 2025  | Value 2026  |
| Cod                   | 7a        | 165                  | 165                  | 0.0%         | 0.8%              | 1                        | 82                     | 83                     | €422,227    | €425,765    |
| Haddock               | 7a        | 1,893                | 1,331                | -29.7%       | -29.8%            | -206                     | 692                    | 486                    | €1,517,679  | €1,065,941  |
| Plaice                | 7a        | 1,504                | 614                  | -59.2%       | -58.7%            | -232                     | 396                    | 164                    | €1,026,556  | €424,453    |
| Common sole           | 7a        | 609                  | 545                  | -10.5%       | -13.5%            | -13                      | 94                     | 81                     | €1,448,376  | €1,252,522  |
| Whiting               | 7a        | 721                  | 721                  | 0.0%         | 0.3%              | 1                        | 258                    | 259                    | €460,884    | €462,247    |
| Norway lobster        | 7         | 16,689               | 16,689               | 0.0%         | 0.0%              | -1                       | 5,313                  | 5,312                  | €54,931,877 | €54,921,011 |
| Sub-total Sub-total   |           | 21,581               | 20,065               | -7.0%        | -6.6%             | -451                     | 6,835                  | 6,384                  | €59,807,599 | €58,551,939 |

Figure 2. shows a reduction of €1,255,660 in fishing opportunities for 2026.

#### Cod 7a

The advice for Cod in 7a will be released later in the autumn but will most likely be for zero catches again in 2026. A bi catch quota in line with that for 2025 must be maintained to allow other mixed fisheries to be prosecuted. Serious consideration should be given to a full and open review of the Irish sea cod closure which was introduced in 2000 to rebuild the stock but has had no positive effect on the stock. This should be undertaken as part of an urgent review of technical conservation measures in the Irish sea as part of a management plan to allow stocks to recover.

### Haddock 7a

The spawning stock is high for haddock in 7a and effort is reported as being stable. There was no NIMIK survey carried out in 2020 due to covid restrictions and this has exacerbated the perceived effect of low recruitment. Reports from fishermen would indicate that there are fish on the ground but they are smaller than in previous years. This may be pointing to an increase in the quantity of bigger haddock in the Irish Sea

in the years ahead. We should keep any cut here to a minimum until the science can catch up and avoid the risk of having a large stock of haddock with no quota to catch it, which would run the risk of a choke in the Nephrops and mixed fisheries.

# Whiting 7a

ICES has advised a decrease of 14,5% with catches no more than 2,263 tonnes. Whiting 7a has been the focus of much research and advances in technical measures since the early 1990s in an attempt to reduce the unwanted catches of undersize fish in the nephrops fishery with varying degrees of success. Work is ongoing in this area with BIM to try to come up with a technical solution to this problem. Unfortunately the advice is for a zero catch once again in 2024, however a bi catch is necessary for whiting 7a to allow Nephrops and other fisheries to operate and to facilitate the ongoing work on whiting selectivity.

# Plaice 7a

The proposed cut of 7% to the plaice TAC in 7a is not an immediate issue for Ireland, however estimated high discards of below MCRS fish is of concern and requires further clarity to resolve and allow the stock to rebuild.

# Sole 7a

ICES advice is for 11% reduction in catches for 2026. The Hague preference is an important factor in this stock for Ireland. ICES previously advised a zero catch option for sole in 7a for 2024. After a benchmark in the spring of 2024 this stock had a revised advice in TAC for 2024 and on foot of this an in year increase in TAC was agreed with the UK. This advice recommended catches be increased by 480 tonnes which represented a 3% increase on the 2023 advice. This stock requires careful monitoring to ensure accuracy of the new advice as the basis of this increase in advice is not entirely transparent.

# West of Scotland

| West of Scotland 2026 |              |                      |                      |              |                   |                          |                        |                        |             |             |
|-----------------------|--------------|----------------------|----------------------|--------------|-------------------|--------------------------|------------------------|------------------------|-------------|-------------|
| SPECIES               | ICES AREA    | TAC 2025<br>(tonnes) | TAC 2026<br>(tonnes) | TAC Change % | Quota Change<br>% | Quota Change<br>(tonnes) | Quota 2025<br>(tonnes) | Quota 2026<br>(tonnes) | Value 2025  | Value 2026  |
| Haddock               | 5b 6a        | 10,681               | 10,136               | -5.1%        | -1.6%             | -21                      | 1,304                  | 1,283                  | €2,859,904  | €2,813,069  |
| Haddock               | 6b           | 10,195               | 20,432               | 100%         | 99.1%             | 617                      | 622                    | 1,239                  | €1,364,157  | €2,716,379  |
| Megrim                | 5b; 6; 12 14 | 5,847                | 6,195                | 6.0%         | 5.9%              | 36                       | 614                    | 650                    | €2,231,578  | €2,363,935  |
| Saithe                | 6; 5b, 12 14 | 7,433                | 5,928                | -20.2%       | -3.0%             | -11                      | 366                    | 355                    | €639,175    | €620,068    |
| Whiting               | 6;5b; 12 14  | 4,952                | 5,364                | 8.3%         | 8.2%              | 118                      | 1,435                  | 1,553                  | €2,563,442  | €2,774,910  |
| Norway lobster        | 6; 5b        | 13,637               | 13,637               | 0.0%         | 0.2%              | 0                        | 184                    | 184                    | €1,902,403  | €1,906,655  |
| Cod                   | 6b; 5b       | 74                   | 74                   | 0.0%         | 6.0%              | 1                        | 11                     | 12                     | €56,640     | €60,028     |
| Sub-total             |              | 52,819               | 61,766               | 16.9%        | 16.3%             | 740                      | 4,536                  | 5,276                  | €11,617,299 | €13,255,044 |

Figure 3. shows an increase of €1,637,745 in fishing opportunuties for 2026 though only the TAC is set in line with the advice for Haddock in 6b Rockall.

#### Cod 6a

The advice for cod 6a is for a zero catch in 2026 which has been determined due to mixing between the North western, Viking and Southern cod stocks in the southern North Sea. The actual advice for 6a cod as part of the North Western area is for catches of no more than 8670 tonnes. To say mixing in the Southern North Sea can result in zero catch advice west of Scotland is difficult to either explain or understand. A revision of this Management area is required immediately to avoid choking of fisheries due to the abundance of cod in ICES Area 6a.

### Haddock 6a

The advice for haddock 2026 in 6a is -4% on the back of a 25% decrease in Tac for 2025. Ireland receives a very small share of this TAC because of the east west divide between West Of Scotland and the North Sea, any possible improvement in this situation for Ireland should be explored.

### Haddock 6b

This stock is a good news story after being bench marked in 2024 and producing an advice of +674 % for 2025. The advice for 2026 is for catches of no more than 20432 a reduction of 35% on 2025 on the advice for 2025. The advice should be applied to the TAC which would give a TAC of 20,432 tonnes for 2026.

# Wider Area 7

# Skates and Rays

Ray is an important target fishery for certain sectors of the Irish fleet including smaller inshore operators but are mostly caught as bi catch in many fisheries. This presents a huge challenge for the landing obligation and the North Western Waters Advisory Council is continuing to work to have management measures established to protect vulnerable skates and rays in the North East Atlantic. This has been recognised by the European Commission with the extension of the survivability exemption to the end of 2027.

# Picked Dogfish

ICES has given advice that catches of picked dog fish should be no greater than 17,353t. However a landing maximum size of 100 mm has been applied. This is having the effect of very low landings of this species although the fish are on the ground, a review of the maximum landing size should be conducted to assess the optimum maximum landing size to allow some landings and protect the populations of picked dog fish.

# Pollock 7

For 2026 Ireland should come out with a quota of 224 tonnes as a catch advice of no more than 3222 tonnes has been given by ICES. This includes estimates of catches

in recreational fisheries which are now part of this quota and will require a balanced sharing mechanism.

.The previous advice was based on landings data, so recent reductions in landings have been interpreted as being the stock has decreased, whereas the reality is that fishing effort has reduced on the stock for various reasons. The TAC for pollock in the wider sock area 7 should be set at or around 2023 levels to avoid choke under the landing obligation and until a full review of this stock and the advice relating to it can be undertaken.

The advise for zero catches of pollack in ICES areas 6 and 7 is causing enormous difficulty for both inshore and offshore fishermen. This advice was introduced after a benchmark in 2023 and because of the lack of data has produced advise that totally contradicts the availability of fish on the ground. A data gathering program should be established as a partnership between fishermen and scientists to fill the data gaps and produce advise that reflects the actual stock levels.

# Pelagic

#### Mackerel

The advice for mackerel of -70% is a hammer blow for the Irish pelagic industry. The problem with mackerel is well documented and both industry and scientists alike have predicted that the stock would collapse as a result of the overfishing by Norway, Iceland and the Faroe Islands of the mackerel stock. This behaviour is causing the Mackerel stock to be overfished and should be opposed by the European Commission in the strongest possible way, including the option of imposing trade sanctions on Norwegian, Faroese and Icelandic fishery products being imported into the European Union. The European Commission must now defend its own regulations and policy of fishing withing MSY advice by refusing access to these nations to EU waters to avoid being complicit in this over fishing. The scale of this reduction in the TAC for Mackerel will make the Irish pelagic fleet unviable and have negative impacts on the whole industry.

# Blue Whiting

The reduction in advice of -41% leaves Ireland in a very poor position considering our tiny 4% share of this stock which is in abundance on our west coast in spring time each year. The ISEFPO supports the removal of Norwegian access to fish for blue whiting in the EU waters (Ireland's EEZ) and fully supports any efforts being made to have Irelands share in this fishery increased.

# Conclusions

Below are the areas where the ISEFPO would like to see progress to improve the status of fish stocks and return the fishing fleet to profitability.

- Subsidies / tie up schemes to reduce fishing effort where stocks require a period of rebuilding.
- Hague Preferences Ireland must invoke all of its Hague preferences where it's quota is below the threshold.
- A review of the technical measures for demersal stocks.
- A review of the Minimum Conservation Reference Size for the demersal fish species.

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