

Sea Fisheries Policy and Management Division  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty, Co. Cork, P85 TX47

11 April 2024

## **Public Consultation on Trawling Activity Inside 6nm**

Dear Minister,

I am making this submission on behalf of the Sustainable Water Network (SWAN), an umbrella network of 25 of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's water environment.

1. SWAN would prefer:

**Option 3: All sea-fishing boats over 18m in length overall excluded from trawling inside the six nautical mile zone and baselines.**

### 1.1 Reasons

SWAN supports a reintroduction of the previous ban (as originally announced in December 2018) on sea-fishing boats over 18m in length overall from trawling in the waters inside the six nautical mile zone (0–6 nm zone) and baselines, which per the Department's own Executive Summary "*had a strong support base.*" This would be one of the most important fisheries policies in the state's history and its immediate implementation is vital. This previous ban on large trawlers was seen as the right decision from a social, economic, environmental and social justice perspective, and SWAN is behind this being reintroduced. We understand there is widespread support of a reintroduction of the previous ban by inshore fishers, and we believe that it is very significant that SWAN and other environmental NGOs are aligned with this position, as was the case in 2020 when the ban was overturned and fishing and environmental organisations jointly called for its reinstatement.

### *Obligations*

SWAN believes it is critical that relevant policies are in line with our legal obligations under the EU's Marine Strategy Framework Directive (MSFD) (Directive 2008/56/EC). A reintroduction of the ban would facilitate bringing Ireland's inshore waters closer in line with Descriptor 3 ("*Populations of all commercially exploited fish and shellfish are within safe biological limits, exhibiting a population, age and size distribution that is indicative of a healthy stock*") and Descriptor 6 ("*Sea-floor integrity is at a level that ensures that the structure and functions of the ecosystems are safeguarded and benthic ecosystems, in particular, are not adversely affected*").

Additionally, the reintroduction of the ban will contribute to meeting Ireland's obligations under other EU law, including the EU Common Fisheries Policy (1380/2013) ; EU Birds Directives (Directive 2009/147/EC) ; and EU Habitats Directive (Council Directive 92 /43 /EEC), as well as Irish legislation (Sea Fisheries and Maritime Jurisdiction Act 2006 ; Maritime Area Planning Act

2021) and the United Nations' Sustainable Development Goal 14 (*Life Below Water: Conserve and sustainably use the oceans, seas and marine resources for sustainable development*).

The prioritisation of nature restoration and biodiversity must be key to policies affecting marine ecosystems. The Government's Climate Action Plan 2024 refers to proposed restoration targets "*for marine habitats, including natural carbon rich marine habitats such as seagrasses and benthic sediment for 2030, 2040 and 2050*" (DECC). It is anticipated that a ban on inshore trawling by larger vessels will facilitate meeting these targets, leading to improved protection of coastal environments and marine habitats, benefitting biodiversity and commercially exploited stocks in inshore areas.

### *Sprat*

We are particularly concerned about the recovery of sprat, the fishery of which is concentrated inside the six nautical mile zone. As a non-quota species, sprat is particularly at risk in Irish waters. Since 2021, large trawlers have been able to resume trawling for sprat within 6nm, without requirement for an authorisation, exceeding sustainable catch limits. The International Council for the Exploration of the Sea (ICES) advises taking the precautionary approach and not exceeding an annual catch of 2240 tonnes of sprat in 2024 in Irish waters, yet in the absence of management in Irish waters, the annual landings of 2020-22 have averaged 12,400 tonnes. We note BIM's analysis showing that "*63% of the average annual value of sprat landings from the six nautical mile zone using trawl and seine gears is in respect of sea-fishing boats over 18m in length overall.*"

This forage fish is an important part of the ecosystem, as prey for many of the larger fish, seabirds and marine mammals found in surrounding seas, which use inshore waters as important feeding grounds. The overfishing perpetuated by large trawlers is having a serious impact on our iconic wildlife and marine ecosystems, as well as stock availability for smaller vessels. Local fishers have reported a massively negative impact on sprat and by-catch, including mackerel. As such, SWAN calls for an immediate ban on >18m trawlers within the 6nm zone to curb the overfishing of sprat and other forage fish such as anchovy and pilchard, vital to marine food webs.

We would like to highlight the fact that pair trawling in particular is a major pressure on the species and habitats of inshore waters. While our support is focussed on an overall ban of vessels over 18m trawling within 6nm within the framework of this consultation, we also support restrictions on pair trawling within Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). The Programme for Government specifically states a commitment to "*ensure that inshore waters continue to be protected for smaller fishing vessels and recreational fishers and that pair trawling will be prohibited inside the six-mile limit*" and SWAN fully supports these commitments being met.

While SWAN's response is rooted in conservation and support of measures to restore biodiversity and meeting the obligations of the MSFD, we recognise the socio-economic importance of fishing to coastal communities, and concerns around a potential ban on certain activities. As such, BIM's analysis showing how a reintroduction of the ban would support the inshore sector of smaller vessels is welcome, while also meeting the Government's commitment as quoted above. We also note the Department's consultation's findings that "*limiting the fishing access of large sea-fishing boats to inshore waters should improve the availability of fish stocks in those coastal areas for smaller sea-fishing boats more dependent on coastal fish stocks. This*

*development would also have a positive impact on smaller sea-fishing boats that are more limited in where they can operate by virtue of size and safety to fishing grounds closer to shore."*

We recognise that this ban is separate to SPA and SAC designation and to forthcoming Marine Protected Area (MPA) legislation and associated management plans. However, many of Ireland's existing marine Natura 2000 sites, as designated under the EU Birds and Habitats Directives, exist within the 6nm limit zone and baselines. While awaiting MPA legislation to understand what pressures on the marine ecosystem may be restricted, a ban on trawling by larger vessels will provide a level of assured protection from this pressure in all areas, including some of the most vulnerable habitats and species.

2. The implementation of your preferred option should be introduced:  
**at national level.**

### 2.1 Reasons

We support implementation around the country, allowing equal access for all Irish inshore fishers. This would provide a base level of protection from the heaviest fishing pressure for an entire region of Ireland's exclusive economic zone (EEZ), regardless of MPA, Special Protection Area (SPA) or Special Area of Conservation (SAC) designation. This also removes the possibility of increasing pressure on some areas of the 6nm zone around the Irish coast.

3. If there is change of policy, the implementation of your preferred option should:  
**come into full effect once a decision is made.**

### 3.2 Reasons

It has been over five years since the original ban was announced, with an intended three-year transition period from January 2020 to allow for adjustment. However, with the exception of a brief stay on the overturning of the ban, large trawlers have continued trawling inshore without restrictions. Given the urgency of the biodiversity crisis, and effects on coastal communities, further delays must be avoided and the ban must be put into practice with immediate effect.

### 4. Additional comments

As Ireland - and the world - experiences a global biodiversity crisis, the state must be ambitious in targets and move swiftly, with a ban on larger vessels implemented immediately to begin allowing biodiversity to recover and socio-economic benefits to be delivered.

Yours sincerely,

*E. Armshaw*

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