



Allihies, County Cork, Ireland

<http://www.friendsoftheirishenvironment.org>

Minister of State Tony Killeen, TD,
Department of Agriculture, Fisheries and Food,
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Dear Minister;

We have written before to your predecessors as we do now before your critical meeting tomorrow with the industry to urge you to heed the advice of your own Marine Institute.

“The closure of the fisheries for the species at risk provide the highest probability of recovery for these species and is the ONLY advice possible in the context of the precautionary approach. Fisheries should only be permitted that take zero catch of the critical species and the fleet must stop fishing when the total allowable catch (TAC) is reached for other species”.

Four fifths of the world's fish species are in danger of collapsing if the current levels of fishing continue. We attach a table detailing the Irish situation.

Mackerel and blue whiting are currently overexploited. In the Irish Sea and to the north off the West of Scotland stocks of cod, whiting and spurdog, and in the Irish sea sole, are severely depleted. In the Celtic sea cod, plaice & herring are depleted.

The move towards deep water fishing for slow growing species such as the orange roughy is totally unsustainable and in just a few years several deep water fisheries have collapsed. The damage to the sea bed, including coral beds, through bottom trawling is brutal and would never be permitted on land.

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Friends of the Irish Environment is a company limited by guarantee registered in Ireland.

Company No. 326985. Directors: Caroline Lewis, Tony Lowes.

The fishermen's demand for payment for retiring boats does nothing for the environment.

The removal of these vessels will merely increase the quotas available to the more modern competitive fishing vessels. This measure will permanently remove some 75 older boats from the Irish fleet at a cost of €280 000 per boat - with no reduction in actual fish take whatsoever.

The EU Court of Auditors warned last year that that quotas were not properly monitored, illegal fishing only lightly punished, and that it remains too easy for skippers to falsify log books.

We urge you to adopt the best scientific advice and establish effective marine conservation areas where all fishing is excluded at all times. Easily enforced, this allows fisherman to harvest the upwelling of fish that spill out of these highly productive areas and yet the stocks are protected from over-exploitation.

Respectfully yours,

Tony Lowes

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Species	State	Comments
North Sea Horse Mackerel	Unknown	Catches increased in 1990 and remain at increased level . TAC set is not precautionary or prescriptive and in some areas juvenile fisheries are increasing
Blue Whiting	Uncertain	Harvested with increased risk. TAC not considered to accord with precautionary principle
Tuna - Albacore	Overfished	Projections show that stocks will not recover at current TAC levels.
Tuna - Bluefin	Overfished	at risk of stock collapse.
Shark - Basking	Overfished	A zero TAC is advised and by-catch must be reduced to the lowest possible level
Shark - Porbeagle	Overfished	No directed fishing should be permitted and by-catch must be reduced to the lowest possible level
Shark - Blue	Uncertain	Precise catch records of blue shark are required for accurate assessemnts
Spurdog	Overfished	Stock is depleted and in danger of collapse. Target fisheries should be stopped and by-catch must be reduced to the lowest possible level
Cod – Irish Sea; West of Scotland; Rockall	Overfished	Considered collapsed. Continued underreporting of catch. Zero catch recommended but not included in existing management plan. Not consistent with precautionary principle
Whiting – Irish Sea: West of Scotland	Overfished	No management plan in place. Significant non-reported landings. Catches of whishing should be of the lowest possible level. Poor data available.
Haddock – Irish Sea; West of Scotland; Rockall	Uncertain	Fishing effort should not be allowed to increase until a reliable assessment is available. At risk of being harvested unsustainably. Management plan recommended
<i>Nephrops</i> – western Irish Sea	Good condition	Management plan recommended. This fishery should not be allowed to increase. Has a negative impact on whiting fishery
Plaice – Irish Sea	Uncertain	Conflicting data – the surveys that indicate an increase in plaice are not borne out be commercial landings. Management plan recommended. Caught together with sole
Sole – Irish Sea	Overfished	Stock is harvested unsustainably. Directed fisheries for sole should not be permitted until stocks recover. Caught together with plaice.
Herring - Irish	Unknown	Showed a marked decline in the 1970s and has remained low
Sea Sprat - Irish	Unknown	Degree of misreporting between Herring & Sprat need to be evaluated before advice can be given.
Megrim – West of Scotland ; Rockall	Unknown	Substantial decline in landings. Misreported. Management plan recommended.