

Future Framework Public Consultation, February 2024

Submission by
The Irish Islands Marine Resource Organisation, Producer Organisation
Organisation

- Irish Islands Marine Resource Organisation (IIMRO) is a member based island organisation representing fishers from Donegal, Mayo, Galway and Cork¹.
- IIMRO is a recognised producer organisation under EU Regulation 1379/2013 on the Common Organisation of the Market for Fishery and Aquaculture Products (the CMO Regulation).²
- IIMRO is an Irish inshore member of the European Union North West Waters Advisory Council³, participating in various working groups.
- IIMRO is affiliated to Low Impact Fishers of Europe (LIFE)⁴ and Comhdháil Oileán na hÉireann - The Irish Islands Federation along with the European Small Islands Network (ESIN)⁵.
- EU Transparency Register.⁶

Submission

- **Diversity.** The fishing community is very diverse; from small traditional vessels with a single crewperson, fishing seasonally close to shore, to large industrial ocean-going vessels fishing across international boundaries. Governance structures must recognise and accommodate this diversity.
- The small scale and inshore fleet segment makes up the majority of fishing vessels in Ireland. Under 12 meter vessels make up around 88% of the Irish fleet.⁷
- Small scale fisheries are vitally important for island and coastal communities, food security and need to be preserved and promoted. Small scale vessels are spatially restricted, operate close to their home ports and are extremely vulnerable to displacement.⁸

¹ www.iimro.org

² <https://www.gov.ie/en/press-release/1d318-mcconologue-announces-recognition-of-iimro-as-a-seafood-producer-organisation/>

³ <http://www.nwwac.org/>

⁴ <http://lifeplatform.eu>

⁵ <https://europeansmallislands.com>

⁶ <https://goo.gl/segVGg>

⁷ [Irish Fleet Register](#)

⁸ <https://bim.ie/wp-content/uploads/2023/03/BIM-An-economic-analysis-of-the-Irish-small-scale-fleet.pdf>

- Indicators. Any impact indicators being used or developed should reflect the large proportion of small-scale vessels, their often seasonal operations and their importance to island and coastal communities. This should include any future indicators being developed such as social indicators, deprivation index etc and not rely solely on economic indicators.
- Tenure. Security of tenure and recognition of customary rights for small scale fisheries is crucial for fisheries governance and resource management and is underscored by the FAO Voluntary Guidelines for Securing Sustainable Small Scale Fisheries. Including; *“States, in accordance with their legislation, should ensure that small-scale fishers, fish workers and their communities have secure, equitable, and socially and culturally appropriate tenure rights to fishery resources (marine and inland) and small-scale fishing areas and adjacent land, with a special attention paid to women with respect to tenure rights.”*⁹ 1011
- Public resources should be for public good not private gain. Energy resources should be developed and retained under state ownership e.g. Norway Model for the oil industry.¹²
- All spawning grounds of national and international importance must be avoided by generation and transmission infrastructure. Shore based infrastructure should be designed in order to facilitate these constraints.¹³
- Offshore renewable installations must avoid locations within the 12 nautical mile limit, on rich fishery grounds and spawning/nursery areas.
- Maritime culture and heritage on the offshore islands which has been recognised by UNESCO as part of Ireland's National Inventory of Intangible Cultural Heritage must be protected.¹⁴
- Spatial Data for small scale vessels. Large gaps exist in official datasets particularly relating to small scale fisheries while a lack of spatial data in a

⁹ FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries. Section 5a, Responsible Governance of Tenure. <https://www.fao.org/3/i4356en/i4356en.pdf>

¹⁰ UN Sustainable Development Goal SDG 14b specifies: *“Provide access for small-scale artisanal fishers to marine resources and markets.”* SDG Indicator 14.b.1 - Access rights for small-scale fisheries. *“Indicator 14.b.1 - Progress by countries in the degree of application of a legal/regulatory/policy/institutional framework which recognizes and protects access rights for small-scale fisheries.”* <https://www.un.org/sustainabledevelopment/oceans/>

¹¹ Fisheries and the right to food in the context of climate change. United nations A/HRC/55/49 96 States should respect, protect and fulfil: (a) Small-scale fishers’ and Indigenous Peoples’ customary tenure rights. This includes fully implementing the Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication;

¹² Fisheries and the right to food in the context of climate change. United nations A/HRC/55/49 101 (b) Govern fisheries through human rights-based approaches and not through private property rights regimes;

¹³ Marine Institute Stock Book 2022, p170: *“Activities that have a negative impact on the spawning habitat of herring – such as ... the erection of structures such as wind turbines in the vicinity of spawning grounds – are a cause for concern (see for example de Groot, 1979, 1996; ICES, 2003, 2015b). This is because a gravel substratum is an essential habitat for herring spawning. Activities that have a negative impact on the spawning of herring should not occur, unless the effects of these activities have been assessed and shown not to be detrimental to the productivity of the stock (ICES, 2003, 2015b).”*

¹⁴ <https://nationalinventoryich.chg.gov.ie/marcanna-na-talamh/>

format suited to decision makers such as VMS and AIS is preventing the identification of fishing areas used by small vessels. This has significant implications for potential displacement and avoidance of fishery areas if not addressed.

- **Offshore Renewable Energy Installations.** There is no information currently available on the scale, location and footprint of the proposed offshore infrastructure, any co-located industries, cables or associated onshore development. This lack of coherence makes it difficult to assess potential impacts on stakeholders.
- **Marine governance** is currently fragmented and requires consolidation into a single marine resource focused department. In the interim the Departments of Agriculture Food and the Marine, the Department of Housing Local Government and Heritage, the department of Environment, Climate and Communications as well as the relevant local authorities should provide clear guidance on proposals and potential impacts to existing marine users, including fisheries, for the lifetime of the projects. This should include planning, surveys, construction, operation and maintenance as well as project end of life provisions.
- **Offshore Renewable Energy** cannot be treated in isolation as cumulative effects on the marine space involve fisheries, marine protected areas, OSPAR, the Marine Strategy Framework Directive, Nature Restoration Regulation and other regulatory requirements.
- **Displacement.** The potential for displacement of current marine users could have a disproportionate effect on already marginalised and disadvantaged island and coastal communities. Priority should be avoidance in these areas. In the case of displacement, those directly affected should be appropriately compensated for loss of their livelihood on an ongoing basis.¹⁵
- **Seaweed** is an important resource for island and coastal communities and the impact of ORE installations and onshore infrastructure needs to be assessed before proceeding with any developments.
- **Tourism** is an integral part of island and coastal economies. Mitigation of visual impacts, environmental damage and small scale fisheries impacts can be achieved by restricting developments to a minimum of outside the 12 nautical mile limit as is being done in other jurisdictions.
- Due to the novel technology utilised in Offshore Renewable Energy (ORE) developments an adaptive management approach needs to be used with

¹⁵ Fisheries and the right to food in the context of climate change. United nations A/HRC/55/49 101 States must revisit the blue economy agenda and should: (a) Protect small-scale fishers, fish workers and Indigenous Peoples from competing "blue economy" sectors;

regular annual reviews and mechanisms to facilitate necessary changes as the industry evolves. Long term and unforeseen environmental impacts are a concern given the lifespan of projects and governance arrangements should have remediation mechanisms in place to deal with any issues as they arise.

- Financial bonds should be utilised to ensure that compliance with permit conditions, remediation, security, salvage, decommissioning of installations etc occurs as intended.
- Engagement should include financial support to increase the capacity of fishery representative organisations to participate fully in the ORE process.¹⁶

¹⁶ *Fisheries and the right to food in the context of climate change. United nations A/HRC/55/49 97 (f) Implement co-management systems for 100 per cent of all coastal areas, by putting in place specific legal frameworks that clearly define the roles and responsibilities of the authorities and fishers and by providing the appropriate support for fishers to engage, taking into consideration their legitimate tenure rights and systems;*