

Summary of responses to consultation on proposals for allocating Northern Ireland additional quota for 2022 to Northern Ireland registered fishing vessels.

Overview of responses

A total of 63 responses were returned via Citizen Space (online consultation), 4 via email, and 2 representations to the Department (1 meeting, 1 phone call). Of the online responses one was deemed a duplication.

Written responses, via Citizen Space, can be allocated to the following groups (some respondents identified as more than one designation)

Designation	Number of responses	%
Sector Fishers	13	19%
Non-sector fishers	11	16%
Quota Managers	7	10%
Supplier	1	1%
Processor	14	21%
Unspecified	21	31%

A list of all respondents/organisations attached (ANNEX A). Those who asked to be kept confidential have been removed, their views are reflected in the summary, but names have not been included.

Consultation approach and questions

DAERA identified a number of principles for the allocation of additional fishing quota, these are tabled below. Additional quota is the extra quota achieved following revision of sharing agreements with other fishing nations as a result of the UK's withdrawal from the European Union Common Fisheries Policy. We identified the range and scale of additional quota allocated to Northern Ireland in 2021 to aid consultation responses.

We sought general agreement that additional quota should be managed differently to the way in which the existing quota is managed. We then sought responses on three specific issues, the non-sector Nephrops quota, Mourne shore herring allocations and other uses of additional quota, namely fishery science partnerships research. Finally, we proposed a general approach for 2022 allocations of other additional stocks, i.e.

- Quotas for non-Irish Sea stocks fished in the first quarter of 2022 will be allocated on the basis of Fixed Quota Allocations (FQAs) to ensure that these opportunities can be fished.
- Quotas for Irish Sea and area 7 stocks not required to cover the proposed additional fishing opportunities, will be allocated on an FQA basis.
- Additional quotas of stocks in other sea areas will be allocated on an FQA basis.

Responses by Question

Question 1:

Should NI additional quota be allocated in 2022 on the same basis as in 2021?

Y/N Response

We identified quota was allocated on a FQA basis for 2021.

Response 22 respondents (34.92% supported using the same allocation basis as 2021. 41 respondents (65.08%) did not support.

Question 2:

Should additional Nephrops 7 quota (on top of the existing quota) be provided to the 10 metre and under non-sector pool?

Y/N Response

We set out the operation of the non-sector in Northern Ireland, and the possible extra quotas that would be needed to support increased additional Nephrops quota. Possible increases were tested in questions 3 and 4.

Response: 35 Respondents (55.56%) supported this approach, 28 (44.44%) did not.

Question 3

If you have answered Yes to Q2 - would you support an allocation of an additional 50t.

Y/N Response

We asked those who supported additional quota to the non-sector pool if 50t was a reasonable allocation.

Response: 5 Respondents (7.94%) would support an additional 50t, 38 (60.32%) answered no, and 20 (31.75%) did not answer

Question 4

If you have answered Yes to Q2 and No to Q3 - would you support an allocation of an additional 100t.

Y/N Response

We asked those who would not support an extra 50t if they would support 100t.

Response 29 responses supported 100t (46.03%), 20 responses did not support 100t (31.75%) and 14 responses (22.22%) did not answer

Further analysis of answers Question 2-4

Category identified by respondent					
Option	Sector	Non Sector	Quota Manager	Other	Total (%)
No increase	10	3	2	13	41%
Quota increase but no tonnage identified	-	1	1	5	10%
50t	2	2	-	2	9%
100t	4	4	2	18	41%

Question 5

Do you support our approach to withhold a proportion of the additional Irish Sea herring quota pending a review and consultation on the Mourne herring fishery?

Y/N Response

We set out the current allocation made from UK quota to the Mourne Shore herring fishery, that there has been representations to increase the scale of this fishery but that we considered that there were a number of issues that needed to be examined in more detail. We proposed a small increase in the allocation in 2022, but further proposed to withhold 30% of the additional quota allocation while a review of the Mourne shore herring fishery was undertaken.

Response. 34 respondents (53.97%) supported this approach, 29 (46.03%) did not.

Question 6

Should additional NI quota be used to support Fishery Science Partnership research projects?

Y/N Response

We proposed to use some additional quota in subsequent years to support Fishery Science Partnerships by providing additional scientific quota.

Response: 35 Respondents (55.56%) supported this, 28 (44.44%) did not.

Question 7

Do you agree with this approach to other additional quota stocks?

Y/N Response

We proposed a general approach for all other additional quota allocations in 2022, following three stages,

Quotas for non-Irish Sea stocks fished in the first quarter of 2022 will be allocated on the basis of FQAs to ensure that these opportunities can be fished.

Quotas for Irish Sea and area 7 stocks not required to cover the proposed additional fishing opportunities, will be allocated on an FQA basis.

Additional quotas of stocks in other sea areas will be allocated on an FQA basis.

Response: 26 Respondents (41.27%) supported this, 33 (52.38%) did not. 4 respondents did not reply.

Question 8

Are there other stocks that can be targeted cleanly by the 10 metre and under non-sector and landed into Northern Ireland ports? If so please state these below and give a reason why they should be allocated to the 10metre and under pool?

Open Response

We asked for additional information on what other stocks might be considered for a different allocation basis to support the 10m and under sector. Only this sector was identified as this is the main non-sector fleet, and sector vessels have some other method of accessing quota via internal Producer Organisation arrangements.

Many respondents used this section to provide further detail on previous questions, to comment on the overall approach, or to identify other concerns. These are summarized below, full responses (other than those who requested confidentiality) can be provided.

General point

- 1 respondent was opposed to the use of additional quota, and considered that FQA allocation basis should be followed.
- 1 respondent opposed differential allocation to the non-sector and suggested there should have been more engagement with the industry, to realise previous diversification support developed within the sector.
- 3 considered our proposals were against DEFRA policy
- 2 respondents raised concerns over quota consolidation in large companies, and growing gap between fleet's access to quota.

Nephrops:

- One respondent considered than 50t was insufficient (only supporting 2 vessels) and the proposal did not offer substantive new opportunities.

Herring. This was the most commented on section.

- One respondent sought more support for smaller vessels, another suggested increased allocations with purchase/ lease options in future.
- 3 respondents sought more support for mid-sized vessels/ trawl fishery, to allow greater diversification.

- One respondent considered the consultation favoured FQA holders and that there should be allocations to under 24m vessels.
- 1 respondent identified 30% of additional quota too little to support trawl fisheries, and another considered 70% suggested for FQA holders should be allocated to support new fisheries.

Other Species for differential allocation

- Additional quota was identified by a number of respondents as offering 'new' fishing opportunities, however not all provided detail on the possible species.
- Mackerel was identified by 5 respondents as a source of new fishing opportunities, either directly in the Irish Sea, or to support swaps (alongside other North Sea additional quotas) to bring extra Irish Sea quota to NI fleets.
- Haddock (1 respondent) was identified as a possible new fishery, however bycatches (of whitefish and herring) were identified as barriers to other directed fisheries, particularly sprat fisheries (3 respondents), with 1 respondent identified herring bycatch as a possible risk to sustainable herring fisheries. Bycatches were also identified by 1 respondent as possible barriers for non-quota stock fisheries (i.e. squid)

New entrants

- Two respondents identified the need to use additional quota to support new entrants, to support investment into new fisheries, with purchase/clawback clause on the quota, or to aid access into Producer Organisations.

There were several comments over the consultation design and format.

- Four respondents identified that the consultation favoured allocation to FQA holders. Comments included; suggestion for more allocation to consideration of under 24m vessels, that consultation did not offer anything new,
- 5 respondents considered the consultation as poorly worded or constructed, with concerns that the format did not aid making comments and did not explore suitable options.

Other consultation submissions.

Four written submissions were received, one following up on previous representation. One additional respondent made representation for a meeting but instead provided verbal input.

The key issues are recorded and summarised below by issue where possible, to give a flavour of each response. The submissions will be considered in full in making the Departments official response and no response on any issue is offered at this stage.

Key Issue

Access to quota

- Access to quota a barrier for new entrants or to enable career progression. Means the fleet, particularly Nephrops vessels cannot diversify, or change fishing pattern. Suggestion that some additional quota allocated to 10m inshore sector, to aid diversification and remainder reserved for new entrants. Fish quota is a state resource and should be allocated to those who need it, (rather than those who have plenty.)
- (Slipper Skippers) - FQA allocations are from 1993-96, many recipients now retired but still receiving a dividend, quotas consolidated and held by larger players. NI Fisheries Department compounded consolidation by allowing boat owners to retain FQA's on decommissioning.
- Producer organisations act to provide dynamic quota management approaches for their members *'ranging from a pool-based system, to individual quotas and including hybrid of both approaches'*. Options include individual or collective quota ownership, allows *'fishermen to buy and sell quota, swap and lease it (quota)'*.

Nephrops

- One respondent identified that DAERA permitted the increase in effort in the non-sector and under 10m groups without checking there was sufficient quota. Some vessels entered sectoral management to access quota. Quota should not be taken from the sector to meet non-sector overcapacity.

Herring fisheries

- **Quality of (herring) catch-**
 - Main pelagic fleet have achieved MSC accreditation- *'perfect temperature and condition and arriving in the factory for speedy and efficient processing and freezing'*. Older catching methods make *'no commercial or good business sense'*.
 - *'the local pelagic industry has invested over many years to maintain the long-term sustainability of Irish Sea herring and have this recognised thought MSC certification. This cannot be endangered'*.
 - Aim of quota use should be to *'aim to ensure the best use of all our commercial catches, ...maximise the economic return from these fisheries'*.
- **Quota (10-24m vessels)**

- One respondent identified that additional herring quota was quickly caught and more quota allocated to (mid-sized) vessels would maintain more boats for longer with more benefits to community.
 - One respondent identified that it was very difficult to access quota to increase the fishing opportunities. Quota is in demand from all vessels. One respondent identified that there are good opportunities to catch herring for the (mid-sized) vessels, but 2020 opportunities via the PO last year were limiting- the quota had to be used too early in the season and resulted in two vessels having to steam to IOM to fish. This catch was sold via PO, considers that better markets can be found and would suggest a minimum of 2 years needed to develop these. Considers that the mid-size vessels could in time have a better economic impact for NI.
 - Suggestion that AQ should be managed separately – respondent reinforced that this is a valuable / vital source of income at year end. Respondent concerned that FQA based quota allocation would simply remove any fishing opportunity and prevent any development of new opportunities. Suggested that half additional quota was allocated to support pilot programme and to develop market,
 - One respondent identified that POs supported diversification into herring fishery for (mid-sized) local vessels. Vessels sought more quota through leasing and swapping- this is established access principle. Respondent questioned why one metier should be given free quota.
- Mourné Shore
 - One respondent identified that the Mourné shore was mainly a hobby fishery with vessels focusing on quantity rather than quality. Opening to other capture methods would allow diversification and produce better quality catch.
 - Mourné shore fishery no longer pursued by *'traditional fishermen'*-now full-time professions with shore jobs, or fishermen who diversify into fishery.

Additional quota allocation

- Current under use of some non-sector pools should not be used to prevent future allocation to non-sector. Mackerel was identified as a possible target species and as an important by catch in squid fisheries.
- Additional quota should be used to cover swaps to prevent early closures of other stocks.
- DAERAs Additional quota proposals will undermine current basis of quota management in Northern Ireland.
- The UK wide allocation of additional quota placed greater pressure on NI fleet- losses due to zonal attachment, no additional quota for North Sea stocks, no allocation of demersal species beyond the Irish Sea.
- *'90% of the additional quota has been allocated on the basis of a new reference period. It should be remembered that these catches were themselves made on the basis of FQA generated fishing activity.'* Departing from FQA based allocation sets dangerous precedent- what other stocks may be impacted?

Consultation process

- Insufficient pre-consultation engagement with Industry was highlighted.
- DEFRA decision to not review 2021 allocation arrangements further disadvantages NI fleet, and address NI fleets issues.
- *'DAERA will step back from their proposals and instead seek meaningful engagement with the industry, which will include a long-term strategy for the development of the fishing industry in Northern Ireland.'*
- One respondent requested *'as advance notice as possible of fishing opportunities in 2022'* to allow lead in time to establish markets, and contact interested buyers/sellers.

Next Steps

Thank you for the responses to this consultation.

DAERA will now consider these responses further and publish an official response to this consultation in June 2022.

ANNEX A

Name	Organisation name
Robert Dornan	
Mark Grant	
John McCormick	
Peter Chambers	n/a
Gareth Chambers	Sea wolf N45
David Gallagher	
Annabelle Chambers	
Jessica Chambers	
Adele Chambers	
Adele Morris	
Bobby Maginnis	
Marshall Thompson	
Christopher Forsythe	
Rosemary McElroy	
Lorna Chambers	
David Shields	Shields Creels
David McKee	
Gary Hedley	
Gareth Hedley	
Andrew Chambers	
Gary Hedley	
Jonathon O'Hare	
Andrew Kearney	Fisherman
Aaron Palmer	
Andrew Orr	Glenluce Fishing Co LTD.
David Forsythe	Herring
Neal Forsythe	NIFPO
Richard Henry James	unattached
David Milligan	Ardglass Sea Products
Mark McCullough	Fishing boat Be ready N99
Seam Milligan	Ardglass Sea Products
Philip Milligan	Ardglass Sea Products
Alan McCulla	ANIFPO Ltd
Comgall Milligan	C & O Milligan NI LTD
Judith Hynes	Ardglass Sea Products
Monic Magee	C & O Milligan NI LTD
Gerard Fitzsimmons	C & O Milligan NI LTD
Robert Milligan	C & O Milligan NI LTD
Oliver Milligan	C & O Milligan NI LTD
Lisa Lawlor	C & O Milligan NI LTD

Stephen McCullough	Stefanie M Fishing Company LTD
Kenneth Patterson	Steadfast N 315
Harry Wick	NIFPO
Stanley Hanna	Fairwind
Graham Annett	
Philip Hill	

Written responses were received from

NIFF- Northern Ireland Fishermen's Federation

Mr Kenneth Patterson

Mr Jimmy Kelly

Mr Comgall Milligan

Verbal response reported from

Mr Stanley Hanna