

Temporary Cessation of Fishing Activities EMFF Article 33

Background

Having emerged from a period of poor weather and challenging obstacles for brown crab in the Chinese markets we have watched the market situation for the inshore sector deteriorate over the last number of weeks due to the COVID 19 Pandemic. The NIFF is also conscious of the difficulties faced by other sectors in their coastal communities particularly other seafood enterprises and marine tourism operators and their need for support. Having reviewed the options that are available to the inshore sector (including those outlined to date by NIFF/NIFA/NIFO) we feel that the situation merits exhaustive exploration of Article 33 under the EMFF Temporary cessation of fishing activities for the inshore fleet for the reasons outlined below:

Rationale for Temporary Cessation of Fishing Activities EMFF Article 33

Despite very limited viable markets for lobster and brown crab members report that many operators are fishing at low or negative levels of profitability. It is likely that this is an effort to keep business operational in the short term while watching how things develop. Prices as low as €6/kg and €0.50/kg for lobster and crab respectively have been offered and reports suggest product is being stored in the anticipation of market recovery, by both fishers (live product) and processors/exporters. Without some form of action, it is likely this practice will become more commonplace while an increase in excess stored product is likely to further depress markets on re-emergence. Storage Aid has been definitively examined and is categorically not the solution for in particular live inshore shellfish species and may indeed add to a depression of markets while increasing mortality both through fishing and storage.

Increasing debt in the sector will decimate our ability to recover and continue profitable operation with inevitable impacts on employment and the economic benefit to coastal communities. There are conservation benefits to be accrued also from a temporary Cessation of fishing activity including, decrease in fishing mortality, increased spawning opportunity for all species and moulting of lobster over the Maximum size limit conferring protection on additional stock. Ideally a temporary cessation of fishing would allow the sector to regroup and work towards sustainable management structure

Some fishing families have been fortunate to receive the €350 Emergency Covid-19 payment this has been a lifeline for putting food on the table and helping pay to run households for fishing families. However, if our fishing operations are to survive with ability to fish and regain our markets and maintain our market share we cannot do this on what is left out of €350 a week. If other households are meant to survive on €350 a week how are we meant to survive AND maintain our business operations through the crisis on the back of an extremely challenging winter and early 2020 season with the problems already outlined? The EMFF

exists to sustainably support our small-scale coastal fishing and now we need that support to be directed to a solution to ensure the resilience of our livelihoods.

The NIFF proposes this measure to be consulted on ASAP as a national measure, as urgent action is required. Not every inshore fisherman is likely to avail of such a scheme, thus enabling a balance to be achieved of;

- maintaining fishing effort as an essential service in line with what markets can facilitate (reducing risk of massive over supply, with some fishermen continuing at manageable and profitable levels, therefore protecting markets, and
- allowing the majority of fishermen the opportunity to temporarily cease fishing, with the cost of their businesses maintained for the period agreed

The NIFF proposes that the temporary cessation be for an initial period of 3 months commencing on the 1st April, 2020. This to be reviewed at the conclusion of the initial period and monthly thereafter. In our view the cost to the exchequer in comparison to other potential solutions being examined would be modest and would fit the requirements of the inshore sector (where measures such as storage aid would be of no benefit to our sector). Whatever the cost to the exchequer the cost of doing nothing is far worse in the medium and long term.

We urge that the government views the benefit of this proposal to assist the fisheries sector as good or best value for utilising what we appreciate as ever dwindling State resources wisely, with best bang for buck. For a relatively small overall and individual payment per fishing business, anywhere between **800 and 1400** operations (that have been active over the period stated under EMMF conditions for a temporary cessation) will be secured into the future, ready to bounce back once market return to normality. The value of this to coastal communities is enormous. We cannot see any other proposal currently being discussed that will assist a fraction of the same numbers of fishing businesses, or impact on coastal communities.

We propose that BIM using existing economic data along with profiling a sample of inshore boats (different fisheries and vessel sizes) could quickly determine the average static operating costs in maintain our business, that would form the basis of payments under a cessation scheme.

The period of a temporary cessation would have the added benefit of enabling the sector to have a valuable look at increasing profitability and sustainable management.



Appendix 1

Estimated cost breakdown of a possible Cessation scheme based upon Initial research undertaken by NIFF. **The figures below are taken from a superficial survey of RIFF members and are only presented for illustrative purposes. Costs vary wildly for even similar length vessels and those below should in no circumstances be considered as a maximum, merely indicative of the small number surveyed.**

Vessel size	No. of vessels registered	Average monthly Fixed Costs*	Cessation Payment per month	Projected Uptake**	Total Cost per month	Total 3 month cost	Exchequer Contribution	EMFF Contribution
<6M	560	€650.00	€650.00	40%	€145,600.00	€436,800.00	€109,200.00	€327,600.00
6M-<8M	486	€730.00	€800.00	40%	€155,520.00	€466,560.00	€116,640.00	€349,920.00
8M-<10M	356	€1,350.00	€1,500.00	40%	€213,600.00	€640,800.00	€160,200.00	€480,600.00
10M-<12M	216	€1,510.00	€1,760.00	50%	€190,080.00	€570,240.00	€142,560.00	€427,680.00
Totals	1618				€704,800.00	€2,114,400.00	€528,600.00	€1,585,800.00

Notes

* Figures based upon a survey of inshore vessels undertaken in several RIFF Regions

** The numbers of vessels in each size segment here is taken directly from the Latest Fleet register. Not all of these are active and not all of the active vessels are in the most affected fisheries.