



Irish Wildlife Trust  
Sigmund Business Centre  
93A Lagan Road,  
Dublin Industrial Estate,  
Glasnevin,  
Dublin 11

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

June 11<sup>th</sup> 2018

**Re: Public consultation on Trawling Activity Inside 6nm**

To whom it may concern:

The Irish Wildlife Trust (IWT) very much welcomes the consultation on trawling activity within the 6nm zone as we have been campaigning some years now for better protection of our marine life. We would like to use this opportunity to call for all bottom and mid-water pair trawling to be prohibited as a matter of urgency, regardless of engine size or vessel length.

The seas around Ireland are the common heritage of the people of this country, as well as future generations, and they belong to no individual or industrial sector. Our seas are our history, our landscape and are vital to coastal communities which, through tourism or small-scale fishing, depend on it for a living. Our ocean wildlife is among the most spectacular in the world however it is gravely threatened from poorly-regulated fishing, pollution and fossil fuel exploration. Indeed, much marine life has already deserted our coastal zone from overfishing and harmful activities – inshore fishing for herring, cod and mackerel are a thing of the past, commercial fishing for salmon, eels and sea bass have shut down completely, while 62% of species of sharks and ray face extinction. Many of these problems can be blamed on trawling – an indiscriminate method of fishing that results in enormous waste and habitat destruction.

As the consultation reports show, there are currently few restrictions on fishing activities in coastal waters and this has led to a downward spiral in the abundance and variety of sea life (both commercial species and other species which are no less important to marine ecosystems). This effect is not restricted to trawling and even low-impact gear can lead to overfishing if poorly managed. It is also notable that the consultation excludes dredging and this is regrettable, as dredging the seafloor (e.g. for scallops or razor clams) is among the most harmful methods of fishing known.

Nevertheless, trawling is responsible for significant negative impacts due to its indiscriminate nature, and the spatial extent to which it is employed. Restricting trawling within the scope of this consultation therefore has enormous potential to

restore marine life and the habitats upon which they depend. There are two main types of trawling which must be distinguished:

1. Mid-water trawling, typically with two boats and known as pair trawling.
2. Bottom trawling including with beams, otter boards or electric currents.

Pair trawling is currently unregulated spatially or temporally and occurs in shallow inlets and estuaries, including some which are designated under the Natura 2000 network of protected areas (e.g. Kenmare Bay SAC and the Lower River Shannon SAC). It harvests sprat, a small fish with little commercial value but with immense value for marine ecosystems. As it occurs near the bottom of the food chain, and can gather in enormous shoals, it is food for all manner of sea life, including sea birds, larger fish and big mammals like seals, whales and dolphins. Its value therefore, is in its ecological role (known as 'forage fish') and it should not be subject to commercial fishing. Other forage fish such as sand eels are not currently subjected to commercial fishing but this could change as demand for fish meal and other marine products increases – it is essential therefore that restrictions are brought in before any speculative prospecting occurs.

Bottom trawling is widely regarded as being responsible for the collapse of many common fish populations since the advent of industrial-scale fishing in the 1800s. The Marine Institute 'Stock Book' shows that most of the seas around Ireland are trawled at least once a year and, in some parts, up to 10 times a year. Due to its indiscriminate nature, it is directly responsible for the collapse of cod, whiting, sole, turbot, plaice and other once-common species. There are many scientific studies which have documented the harm that bottom trawling inflicts, one worth highlighting showed that repeatedly trawling the seafloor cut biodiversity by up to half, reduces animal life in the sediment by up to 80% and presents a major threat to sea-floor ecosystems on a global scale.<sup>1</sup> According to the UN's Food and Agriculture Organisation "intensive disturbance [from bottom trawling] has been shown to cause considerable reductions in the abundance of several benthic species."<sup>2</sup> Bottom trawling is also a source of immense waste, with up to 90% of the volume simply thrown overboard<sup>3</sup> (it is important to note that the 'landing obligation' under the Common Fisheries Policy does not extend to non-commercial species which can comprise most of the catch). An end to bottom trawling within the 6mn zone can bring an end to these damaging effects and begin the road to recovery of sea life. Although fishing with electric currents (known as 'electric pulse fishing') is not yet used in Ireland, it is currently under review at a European level and would represent a major backward step in fishing policy were it to become widespread.

A recent opinion published in the journal 'Nature' urged the creation of strictly-enforced 'marine protected areas' (MPAs) covering 30% of ocean habitats if we are to avoid "a mass extinction of marine life"<sup>4</sup>. Indeed, the Irish government has signed up to the target of reaching 10% of our seas as MPAs by 2020 however the current figure is only 2.3%. The Marine Strategy Framework Directive also provides for the designation of a 'coherent network' of MPAs along with achieving 'good environmental status' for all our seas. Among the descriptors used to measure this are biodiversity (descriptor 1), healthy populations of commercial fish (descriptor 3),

---

<sup>1</sup> Pusceddu et al. 2014. 'Chronic and intensive bottom trawling impairs deep-sea biodiversity and ecosystem functioning'. Proceedings of the National Academy of Sciences.

<sup>2</sup> FAO FISHERIES TECHNICAL PAPER 472. 'Impacts of trawling and scallop dredging on benthic habitats and communities'. S. Løkkeborg

<sup>3</sup> Hayward P.J. 2016. *Shallow Seas*. Harper Collins.

<sup>4</sup> <https://www.nature.com/articles/d41586-018-05079-z>

elements of food webs ensuring long-term abundance and reproduction (descriptor 4), and sea floor integrity ensuring functioning of the ecosystem (descriptor 6). Ocean conservation can also help in the fight against climate change as it has been shown that kelp and seagrass beds can sequester large amounts of carbon.

A restriction on trawling within the 6 nautical miles zone can help to achieve all of these aims. Such a move provides an enormous opportunity to allow for the recovery of marine life, the celebration of a healthy ocean and truly sustainable coastal communities.

We hope that this bold move will be passed but on its own it will not be enough to provide the protection needed for healthy seas. Only good management of marine resources will do that, something which should include the prohibition of other damaging fishing practices such as dredging and tangle netting, better regulation of supertrawlers, the ending of overfishing, the designation of robust MPAs, the banning of exploration of fossil fuels, and the legal protection of threatened marine species. Prohibiting trawling within the 6nm zone however would be a major step in the right direction.

Ireland has a significant portion of the North Atlantic Ocean and this provides us with a great opportunity to become world leaders in conservation. We can show the world how protecting our seas can provide untold benefits for our people as well as the wildlife upon which we depend.