

**From:** Environmental Co-ordination (Inbox) <Environmental\_Co-ordination@agriculture.gov.ie>  
**Sent:** Monday 28 March 2022 08:38  
**To:** Development Plan  
**Subject:** "Submission to Draft Clare County Development Plan 2023-2029"

Hello

Please see below comments from the Department of Agriculture, Food and the Marine regarding commercial sea-fisheries and the draft County Clare Development Plan.

We note and support that the Clare County Development plan recognises sustainable commercial sea-fisheries as an important industry to be supported and provided for. The plan also mentions the high and rapidly increasing demand for maritime space. It is important to remember that commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. It is essential that any negative impacts on fisheries are avoided. The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, and taken into account.

The plan states overfishing as being a problem in the marine environment. It should be noted that the CFP is the mechanism by which EU fisheries are managed. The EU's goals for sustainable fisheries are supported through the CFP. The CFP provides the framework for the long term conservation and sustainability of fish stocks around our shores and is designed to ensure the long term sustainability of fishing in the waters around Ireland and throughout EU waters. The CFP provides that Total Allowable Catches and quotas are set in line with Maximum Sustainable Yield (MSY - which is the level which allows the highest catch of fish while keeping stocks sustainable in the long term).

It should also be noted that the CFP specifically provides that fishing and aquaculture activities are environmentally sustainable in the long -term and are managed in a way that its consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies. There are a range of measures which are employed to ensure the conservation and sustainability of fish stocks in EU waters.

In 2020, 45% of the stocks of interest to Ireland were fished at or below MSY - this increased from 34% in 2013. In 2009, at EU level only 5 stocks were fished at MSY. This shows that the many years of intensive, industry-led conservation measures within the framework of the CFP are paying off.

We note the plan supports the construction of offshore windfarms, including suggested floating wind turbines. In the event that offshore renewable energy installations (including offshore windfarms, tidal, and wave generators) are proposed, again the evaluation and consideration of potential impacts on any commercial sea fishing activities needs to be given consideration. It is essential that any negative impacts on fisheries are avoided. Again, also, stakeholders need to be consulted at as early a stage as possible and throughout the process to ensure fisher's livelihoods are supported.

Finally, volume 1 refers to the Department of the Marine on a few occasions – there is no such Department. Commercial sea-fishing comes under the remit of the Department of Agriculture, Food and the Marine.

Kind regards

**An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh,**  
*Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |*

**An Roinn Talmhaíochta, Bia agus Mara**

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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolais san ríomhphost seo, agus in aon ceanglái leis, faoi phribhléid agus faoi rún agus le h-agmaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.