

# **The Irish Charter Skippers Association submission on the National Marine Planning Framework**

## **Key Evidence**

A large number of Irish and international Tourists seek to enjoy access to Irelands Marine Recreational and Leisure facilities.

Charter Boat Operators provide a nationally licensed and inspected craft with a professionally qualified Skipper to enable these tourists access to marine facilities, in a safe and comfortable manner, for sea angling, touring, whale watching, and sightseeing in Irelands many harbours, rivers, bays and open seas, from river and shore, to as much as 40 nautical miles from point of departure.

The majority of Charter Vessels are based on the South and Southwest coasts, but it is an Island wide business, involving 130 large charter vessels and a similar number of smaller Rigid Inflatable Boats (RIBs) and other craft. The 130 boats average 50 days a year at sea, with an average of 10 passengers per trip, to provide a minimum of 65,000 annual passenger angling days at Sea. Associated bed nights, tackle purchase, guiding fees and dining facility provision, all add to the economic impact of the Charter Business

Charter Boats are licensed by the Department of Transport Tourism and Sport (DTTaS) Marine Safety Office (MSO) under S.I. 273/2002, and are subject to bi-annual inspection.

Skippers must hold a Commercial Endorsement issued by the Irish Sailing Association, under Marine Notice 27/2005 and S.I. 27/2005, renewable at 5 year intervals.

General leisure, angling, and other Marine Tourism provides a large social dividend especially in the more remote coastal communities.

## **Issues for Delivery**

The age profile of Charter Boats currently in use is quite high, and likely to remain so for the foreseeable future, primarily due to the very high cost of purchasing a new boat, and restrictions placed on importing second hand craft from the UK by the MSO. There has been no New Purchase Grant, or low-interest loan scheme, to enable Skippers acquire replacement craft for many years. The ageing fleet imposes restrictions on ongoing safety, availability, fuel efficiency, and general running expenses for Skippers.

Skippers also have an aging profile, due mainly to the very high cost of entering the business, preventing younger Skippers being recruited.

There has been chronic underfunding in advertising and promoting the Sea Angling / Charter Business, and the provision of vital infrastructure (Passenger boarding facilities, Marina berthage) for charter boats, on the part of the State, resulting in the gradual running down of the industry and infrastructure, while other countries (such as Norway) have invested and advanced strongly in the same period. It is interesting to note, there is no mention of Sea Angling in the list of tourist activities in Section 20.5 of the National Marine Planning Framework.

Seal predation is an ongoing and increasing problem, it is not uncommon to have to move location to avoid the loss of every single fish hooked. Other issues limiting business growth are rapidly rising fuel costs, and the potential impact of possible Common Fisheries Policy fish quotas.

### **Issues for Other Sectors**

The Marine Safety Office will only give very restricted P3 (3 N. Miles from shore) Licenses to 2<sup>nd</sup> hand or even brand new boats imported from UK, insisting that any such vessels must be built under their direct inspection in order to be given an appropriate license. This is despite the fact that virtually every other class of vehicle, vessel or aircraft (Car, truck, trawler, yacht or 'plane) can be imported without such restriction, upon inspection in Ireland.

Unlicensed operators of Charter Boats are very rarely reined in, on the other hand, so they can offer virtually unrestricted competition to licensed Charter Boat operators. Huge loopholes in legislation allow some skippers to operate with impunity ( so called "club boats" and also allowing so called "contributions to costs" ) The ICSA is unaware of any unlicensed charter boat ever being successfully prosecuted, to date.

Current Legislation offers no appeal, except via the Courts, in relation to a surveyor's decision. Some Irish legislation is an exact copy of the UK's similar legislation, but with sole exception of the provision of an appeals process. In fact, section 15 of the Merchant Shipping Act mandates that any Determination (opinion or decision) by a surveyor has the force of Law, without any stated requirement for logic, scientific fact, or fairness. This is an unacceptable state of affairs and has led to some ludicrous rulings in the past.

The implementation of Special Areas of Conservation (SAC's) and Marine Protected Areas ( MPA's) , and Wind Farms must take in to account the requirements of the Charter angling fleet. Areas close to ports and harbours must not be closed off to Charter Boats, given their limited range and the need to consider their passengers requirements and susceptibilities.

Any implementation of CFP quotas for Charter Boats would have to first be withdrawn from existing commercial vessel quota, which will be very difficult to achieve agreement on, and can be expected to drive a wedge between Charter boats and commercial trawlers, an unwelcome division in the Marine Community. This will happen despite the fact that there is a total prohibition on any sale of recreationally caught fish.

Wreck fishing is an essential part of the Sea Angling experience. Many of the wrecks utilised are from WW1 and are now slowly vanishing, which will be a great loss. The establishment of artificial reefs whether of concrete or specifically sunk stripped-out vessels should be implemented, as tourist Dive sites, as spawning refuges, and as development areas for all species. Angling on these new reefs should be allowed, but not commercial netting, due to the impact of lost gear on the stocks and marine environment. These refuges effects will have a disproportionately large impact in improving fish stocks

Irish Charter Vessels currently have no allowance of Blue Fin Tuna. Quotas for other countries are proposed to increase in the future, but no quota at all is envisaged being given to Irelands Charter Fleet, despite Blue Fin Tuna availability and huge market demand, literally on our shores. It is vital that this fishery be developed on a catch and release basis, which will allow fish tagging to furnish vital research on this important fishery.

### **Issues for Sustainability**

Charter Boat operators and associated businesses (Accommodation, Dining, Tackle, sightseeing and Angling Guiding operators) offer a lot of growth potential for employment, especially in the more remote areas, with strong socio-economic benefits to coastal communities in general, and low to minimal impact sustainable utilisation of Marine resources.