

## Denholm Fishselling Limited - Written evidence (NIP0015)

### **Submission to the EU Environment Sub-Committee's Inquiry into Agrifood and the Northern Ireland Protocol**

Denholm Fishselling Ltd is a privately owned subsidiary of the J&J Denholm Group. The company is based in Scotland and operates from a number of Scottish fishing ports; it also has one office in Northern Ireland, in Portavogie in County Down.

The main activities of the Portavogie office are as follows:

- owning fishing vessels in partnership with local fishermen. These trawlers are registered in Northern Ireland (NI), but also land in ports in the Republic of Ireland (RoI);
- selling fish and prawns on behalf of the local trawlers, on an agency basis, to various processors in both NI and the RoI; and
- operating groupage transport for fish and prawns on a daily basis from Fraserburgh, Peterhead, Aberdeen, Glasgow, Ayr and Troon to Belfast. These products are then redistributed to fish merchants and processors in NI and RoI.

### **Responses to Questions**

1. The scenario which would have the most detrimental impact on NI fisheries would be exclusion from the UK Total Allowable Catch (TAC) – or whichever protocol succeeds this – and the resultant lower quota allocation. The lower catches and poor landings would be disastrous for an industry already teetering on the brink of financial unsustainability.

Conversely, an increased share in the UK TAC would enable NI fisheries to land a higher quantity of different species of fish. In addition to the obvious increase in income, this would also make it financially viable for boats to equip themselves with a range of fishing gear for different catches, providing the ability to diversify and bringing greater stability to an industry at the mercy of both quotas and markets.

The greatest ongoing fear for NI fisheries is that we would be excluded from UK negotiations – either actually or on a de facto basis – and treated as if the Protocol effectively brought NI within the EU fisheries sector. The main reason for the overwhelming support for Brexit from the fishing industry was to take back control of UK waters; if this is negotiated away from NI, leaving the EU will not provide this part of the industry with any real benefit.

2. Denholm Fishselling is not anticipating a significant change in the status quo in NI products going into Great Britain but this is not a relevant aspect of our business.
-

3. a. The EU Catch Certification Scheme and the introduction of an Export Health Certificate (EHC) for fish being transported from Scotland through Northern Ireland to the Republic of Ireland could have a seriously detrimental impact on the movement of fresh fish. A veterinary official would be required to sign the EHC as fish is loaded onto a lorry, which normally takes place during anti-social hours and under extreme time pressure due to the perishability of the product. For example, an average daily load of fifty pallets, on two trucks, may be collected from twelve different locations and sources, and may include quantities as small as two tubs of scallops. On arrival in Belfast the load may be redistributed to ten different customers.

It is unclear to whom the costs and responsibilities of these additional SPS formalities will devolve, let alone the organisational challenge of arranging veterinary cover at such a range of locations during night-time hours.

- b. The introduction of product-related regulatory controls and tariffs will undoubtedly impact on the cost of fish to the end user, although fishermen are also likely to receive lower prices to account for these additional costs.

A further concern relates to the imperative need to supply a fresh product on a daily basis – any delay in negotiating customs checks could lead to a significant deterioration in quality.

4. The NI catching sector has a fairly low level of interaction with mainland Europe but deals widely with RoI. Therefore, it is important that any future UK-EU relationship ensures free North-South movement of fish without customs barriers.
  5. The Government can most effectively engage with and support the NI fisheries/seafood sector by maintaining a meaningful channel of communication. This would ideally be a named individual – a 'go-to' person – rather than a board or committee, someone with a specific role in addressing issues immediately as they arise. This would not only provide the sector with the type of support and reassurance it requires, but would also deliver accurate on-going evidence for the monitoring and review role the Government will surely wish to adopt.
  6. The Joint Committee and its supporting bodies should prioritise making Brexit as smooth a transition as possible, with a soft border between Great Britain and NI, as well as NI and RoI.
  7. It is unclear at this stage whether or not the Protocol arrangements will be in place for 1 January 2020, but obviously the industry
-

would prefer to have as much notice as possible to prepare for the ending of the transition period.

8. COVID-19 has hit this sector very seriously because of the near-collapse of the hospitality industry, the ultimate end-user of most of the NI fish and seafood. This has meant that the sector is currently focussing on survival rather than on preparation for the Protocol.
  
  9. The Protocol will play a vital role in facilitating North-South trade but the main direction of fish movement is between Great Britain and NI: the Protocol may increase, rather than resolve, difficulties for the main area of business for the NI fisheries/seafood sector.
-