

# Summary of responses

## Consultation on the draft Joint Fisheries Statement

Date: June 2022



Department  
for Environment  
Food & Rural Affairs



Llywodraeth Cymru  
Welsh Government



The Scottish  
Government  
Riaghaltas na h-Alba



Department of  
**Agriculture, Environment  
and Rural Affairs**

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)



© Crown copyright 2022

This information is licensed under the Open Government Licence v3.0. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/)

This publication is available at <https://www.gov.uk/government/consultations/draft-joint-fisheries-statement-jfs>

Any enquiries regarding this publication should be sent to us at:

[jfs@defra.gov.uk](mailto:jfs@defra.gov.uk)

# Overview

## Policy background

Marine fisheries are of great importance to the United Kingdom – our seafood sectors generate food, jobs, culture and a strong sense of identity and pride for their communities. The stocks of fish on which they are based support significant recreational uses and contribute to the healthy functioning of our marine ecosystems.

Now the UK has left the European Union (EU), the fisheries policy authorities, through the Joint Fisheries Statement (JFS), wish to outline plans to pursue sustainable fisheries policies that are tailored to the needs of our industry and our marine environment. The Fisheries Act 2020 (the Act) enshrines in law our commitment to sustainable fishing, supporting future generations of fishers while allowing our marine environment to thrive. It provides a legally binding structure to protect and recover stocks, support a sustainable fishing industry, and safeguard the environment. Included within the Act are fisheries objectives that set the UK's strategic direction for delivering sustainable fisheries management. The UK's fisheries policy authorities are required to develop a JFS to set out our policies for achieving, or contributing to the achievement of, the objectives.

The UK Government, Northern Ireland Executive, Scottish Government, and Welsh Government have a history of productively working together on fisheries management to define and achieve the UK's vision for clean, healthy, safe, productive and biologically diverse oceans and seas. The draft JFS was jointly prepared by the fisheries policy authorities for consultation.

Fisheries management in the UK is largely devolved. As part of the wider UK Fisheries Management and Support Framework (the Fisheries Framework), the JFS provides a mechanism to manage policy divergence while establishing common goals for all administrations to work towards. As a responsible coastal State, the JFS sets our policy framework for how we will work with international partners to ensure the long-term sustainable management of the fisheries resources we share. Through the JFS and the policies and management measures which will flow from it, the fisheries policy authorities will together deliver a prosperous fishing sector for future generations, while safeguarding and restoring the marine environment on which the sector and wider society depends.

## The consultation period

The consultation on the draft JFS was published on Tuesday 18 January 2022 and was open for 12 weeks, closing on Tuesday 12 April.

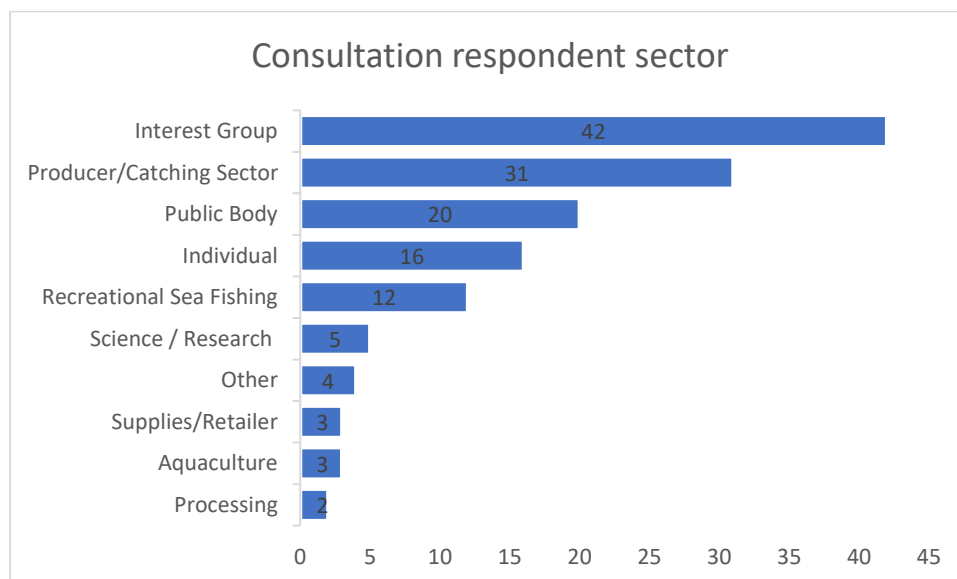
## Why we asked people for their views

Public consultation was launched in line with the requirements of the Act. The fisheries policy authorities recognise the importance of engaging with stakeholders in ensuring the JFS is fit for purpose and were keen, through the consultation process, to hear from any persons interested in, or affected by, the policies contained in the JFS, and members of the public.

## Analysis of responses

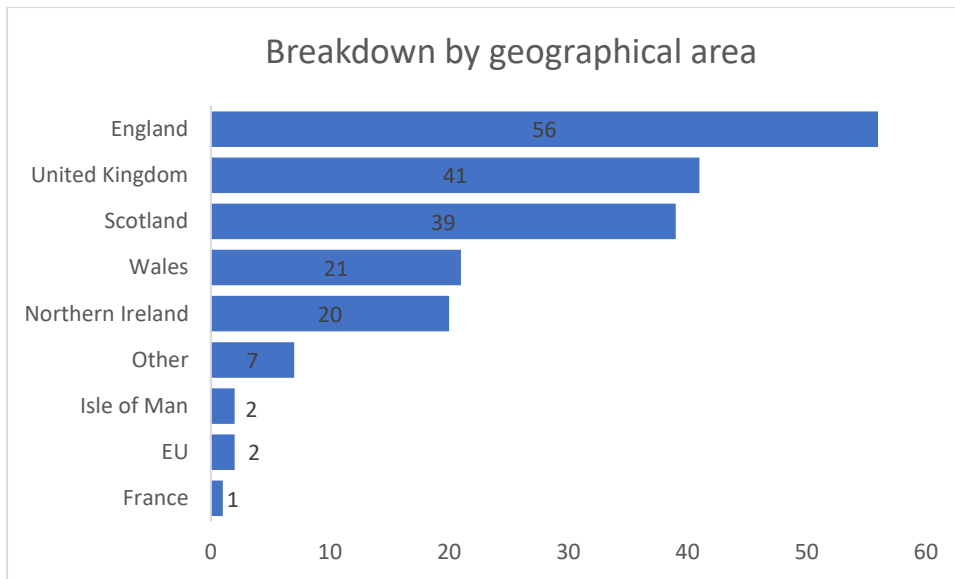
In total, 138 responses to the public consultation were received, most of which were submitted via Citizen Space with the remainder via e-mail. The breakdown of responses by stakeholder type and nation is given in the charts below.

Figure 1: Number of consultation respondents by sector.



*This data was collected either via Citizen Space, where respondents self-identified as belonging to a sector, or completed according to the details provided by each respondent.*

Figure 2: Breakdown of responses by geographical area.



*This data was collected either via Citizen Space or completed according to the details provided by each respondent. Respondents either self-identified as belonging to a geographical area or indicated to which geographical area their response applied. For this reason, each individual respondent selected multiple nations where relevant.*

Due to the qualitative nature of responses, a thematic analysis was conducted. Each response was analysed using an iterative approach, with each reviewed twice to identify both the themes raised by respondents and policy recommendations put forward. This analysis was quality assured and a summary for each response was produced. These summaries were used to produce the summary of responses outlined below.

## Summary of responses

As part of the public consultation, respondents were asked a number of questions to which they provided information about themselves or their organisation (see the charts above), followed by four questions which allowed them to express their views on the content of the draft JFS. Summaries of the responses to these four questions are detailed below.

### **Question: To what extent do you think the policies articulated in the draft JFS will achieve, or contribute to the achievement of, the fisheries objectives?**

While a number of responses addressed this broad question directly, the majority chose to focus on particular policy areas, often providing their views on the content they would like, or expect, to see in the JFS. Both types of response have been included. The themes are outlined below and are presented alphabetically. The content within the themes is broadly ordered to show how strongly points within the theme emerged in the analysis.

## **Bycatch**

A policy area addressed by many respondents was bycatch. There were repeated requests for the JFS to provide specific details on management measures for bycatch, with multiple respondents calling for the JFS to address how discards and bycatch will be reduced. A number of responses, including many submitted by interest groups and environmental Non-Governmental Organisations (eNGOs), requested the roll out of compulsory Remote Electronic Monitoring (REM) on vessels. A small minority of respondents called for firm and time-bound commitments to mandate implementation of Remote Electronic Monitoring. A small number of respondents highlighted their interest in having clarification within the JFS on when it is “appropriate” to apply a discard exemption and a broadening of the definition of ‘sensitive species’.

## **Climate change**

On climate change, respondents broadly welcomed acknowledgement of the importance of considering how the sector can mitigate climate change. However, many reported that they felt further detail on how to decarbonise the UK fleet, the role the marine environment can play in achieving net zero and policies to address the impacts of fishing and aquaculture on blue carbon habitats were needed. Some respondents, including both producers and catchers and interest groups, pointed to a need for support for the industry to adapt. A small minority of respondents from the producer and catcher sector felt that the JFS failed to recognise the opportunities that climate change may bring for the UK fleet, particularly in terms of stock movements.

## **Fisheries management plans**

An additional area that received significant attention in consultation responses was Fisheries Management Plans (FMPs) (see also the summaries under the FMP question below). In general, there was support across a broad range of responses for the commitment to produce FMPs as a management tool. Concern tended to focus on where these plans could lack specific policies that would ensure sustainable fishing or a healthy marine environment. A number of responses called for an ecosystem-based approach to FMPs, in which plans were drawn up at a fisheries level rather than a stock or species level. This concern was shared by producers and catchers, suppliers and retailers and one interest group. Other issues raised by some stakeholders included a lack of detailed policy on how the FMPs would reduce bycatch or improve data collection to establish scientific reference points.

## **Fishing opportunities**

The consultation produced various positions on fishing opportunities, quota and quota management rules. Most of those responses suggested in some way that the approach should be changed – whether that be a simplification of the rules, greater transparency and accountability, an allocation based on best practice, earlier allocations of quota, taking more of an ecosystem-based approach, a redistribution

of fishing opportunities that provided, for example, greater equity within and between inshore and offshore fleets, or a better balance between the need for food security and sustainability.

### **Healthy marine environment**

Linked to comments made around a healthy marine environment, many respondents addressed marine spatial planning in their submissions. The majority of these called for further detail on how Marine Protected Areas (MPAs) will be managed. Producers and catchers in particular were keen to see further detail on how the effectiveness of MPAs will be measured. They also felt that spatial management, especially in inshore fisheries, had to prioritise fishing needs, and take into account the impact of displacement.

### **Participatory decision making**

One area in which there was broad consensus amongst respondents was on the importance of engagement and participatory decision making. While a number of responses acknowledged support for the JFS's commitment to collaborative working and participatory decision making, stakeholders across sectors called for the JFS to be clearer on the processes for stakeholder engagement and their scope for input into decision-making processes. A small minority of respondents from producer organisations noted that it would like early-stage co-management to be agreed, and that whilst it is happy with the inclusion of wording on partnership and participatory decision making, it would like to see a standard and understood approach to co-management.

### **Production, marketing and consumption of seafood**

There was support for the policies on marketing and consumption of seafood. Some respondents considered there should be additional attention to labelling and traceability, the promotion of locally sourced seafood, raising consumer awareness and the development of international markets for UK seafood. The collection of data and catch information to ensure transparency on the origins of fish caught was also mentioned.

### **Recreational sea fishing**

Some respondents were critical of the lack of detail on recreational sea fishing, and the contribution this sector can make to the economy, scientific evidence and data collection. There was a view expressed that the JFS prioritises commercial fishing over recreational sea fishing, and that the socio-economic benefits of the latter have been overlooked.

### **Science and research**

A number of responses focused on the need to commit to, and fund, time-bound science research projects. This would, in turn, improve data collection and modelling, address scientific evidence gaps and provide better outcomes. There was support for collaboration and engagement between all stakeholders, whether from the wider scientific community, fishers or elsewhere; and at all levels, including internationally.

## **Seabed abrasion**

A few respondents who commented on seabed abrasion advocated for various forms of protection from bottom trawling. This was countered by others, who said that some bottom trawling could be compatible with seabed conservation objectives or queried the science around seabed abrasion.

## **Sustainability**

There was support for the sustainability objective and sustainable management of fisheries. Overall, however, the majority of respondents who highlighted this issue felt that statements on sustainable fishing could be strengthened. There was concern about perceived insufficient detail on how the sustainability objective would be achieved; the availability of data; and how a balance would be achieved between socio-economic factors, environmental impacts and fish stock health. Some respondents commented on the need for collaboration on shared stock management, and management of fleet capacity to ensure sustainability.

## **Targets**

A few respondents were satisfied that the JFS would enable the fisheries objectives to be achieved. Others considered that time-bound targets were absent, and that this could present difficulties in delivering and achieving the objectives.

## **The Wider Marine Environment**

Overall, respondents to this question were supportive of the JFS's commitment to safeguard the wider marine environment and its aim to recover stocks and reduce emissions. Nevertheless, many responses highlighted a concern that the JFS lacks 'substantive' policies to ensure an ecosystem-based approach is used to ensure sustainability, meet Good Environmental Status (GES) or secure fishing at Maximum Sustainable Yield (MSY). This was a particular concern to interest groups, which called for the inclusion of a statement on how the marine environment will be protected and restored over a clear timeframe.

## **Other comments**

In addition, there were a number of general comments to this question, some of which supported the JFS's aims and acknowledged the high-level nature of the JFS, while others focused on a perceived lack of detailed or identifiable policies.

A number of respondents referred to the challenges facing the workforce, including the difficulties in attracting people into the industry, whether that was in terms of either developing the domestic labour market or in the use of, and access to, migrant labour.



Other issues raised in consultation responses included calls for tougher enforcement of Illegal, Unreported and Unregulated (IUU) regulations, further emphasis on the importance of fishing to coastal communities, and provision of funding to support innovation within the fishing sector and data gathering. There were calls for clarifications on marine litter policies, with requests that firmer commitments and investment is provided to support recycling. On aquaculture, interest groups and eNGOs in particular were keen for a clear commitment in the JFS to ensure that the industry does not damage marine environments and is subject to appropriate regulation and accreditation.

## **Question: What are your views on the proposals for developing fisheries management plans?**

### **FMP - approach**

A number of respondents highlighted that the approach outlined for the delivery of FMPs appeared sensible. There was a general recognition of the devolved nature of fisheries, and that fisheries policy authorities would work together as appropriate in the creation of the plans.

Some expressed concern about the ability of the fisheries policy authorities to deliver the FMPs to the timescale suggested given the number of competing priorities.

Others highlighted that this would be a challenging process to get right, it should not be rushed, and that FMPs should be developed in tandem with other marine policy.

A number of respondents sought greater detail in the JFS on how the FMPs would be implemented.

Some respondents argued that a commitment to regional management plans would be welcomed.

Some respondents argued that the JFS should include an explicit statement that all FMPs will be subject to consultation. Others called for the JFS to include the principles that will underpin the consultations on the FMPs.

A small number of respondents argued that a shortcoming of the FMP approach was that they would only cover one stock. These respondents argued instead for an area-wide approach that would take into account the complex relationships between species.

Respondents hoped that the proposed list of FMPs was not exhaustive, and that further plans would emerge as considered appropriate. FMPs for specific stock were proposed by some respondents. These included Lemon Sole, cuttlefish and sandeels.

Some respondents also argued that the FMPs should be developed for Non-Quota Stocks (NQS) across the four Administrations.

A minority of respondents argued that there should be a commitment to a two-year review period for each FMP.

## **FMP – monitoring**

Some respondents highlighted concerns about how FMPs would be monitored to ensure that sustainable fishing takes place. These respondents argued that FMP development guidance should be published, and that FMPs should undergo regular, independent quality assurance to ensure that all of the Act's fisheries objectives were considered and addressed.

## **Participatory decision making**

The vast majority of responses to this question across all sectoral groups, argued that FMPs must be developed and delivered in close collaboration with stakeholders. A number of stakeholders were mentioned explicitly, including fishing communities, the fishing industry, and appropriate groups such as Inshore Fisheries Conservation Authorities (IFCAs) and Regional Inshore Fisheries Groups.

Some argued that government and industry should work together to craft the FMPs, and that these should include plans to overcome wider challenges to industry such as workforce planning.

Some respondents called for Crown Dependencies to be involved in the development of FMPs, especially those plans relating to crab and lobster.

## **Science and evidence**

Respondents highlighted the importance of good science and evidence to support the development of the FMPs. However, a number raised concerns about the quality and quantity of data available on which to base decisions. Some also expressed concerns about resource pressures on science teams to deliver the necessary analysis to support the FMPs. A minority of respondents argued that the FMPs should be reviewed by an independent scientific body.

Some respondents wished for greater clarity on which scientific baselines would be used, especially where data for MSY did not exist.

## **Sustainable Fishing**

Most respondents to this question thought that FMPs were a welcome initiative to support sustainable management of fisheries across the UK. Many underlined the importance of sustainable fisheries and highlighted the value of FMPs in supporting the delivery of the sustainability objective, the ecosystem objective and other objectives. Others highlighted that the proposed approach was well calibrated to balance sustainability and social aspects of fishing.

A minority of respondents suggested specific measures to be included in FMPs, for example, a focus on disease management, the needs of fishing communities, management of fishing gear waste, animal health and welfare, and combating IUU fishing. Others argued that FMPs should take a holistic approach to ecosystem management, especially considering how to meet GES and the Act's fisheries objectives.

A number of respondents believed that the JFS should contain a commitment to produce an FMP for every commercial fish stock, while others argued that all species impacted by commercial and recreational fishing should have an FMP.

### **Targets and deadlines**

A number of respondents argued that there should be a greater level of detail on the timings and process for developing the FMPs. They also called for clear targets for achieving sustainable fishing and a timeline for stock assessments to be carried out.

## **Question: Are there any other areas of fisheries policy you think should be included in the JFS?**

### **General comments**

Overall, stakeholders welcomed the JFS, but stated it should contain more tangible policies. There was also feedback from a few of respondents that the JFS should integrate with wider fisheries related legislation. Views on specific themes are outlined below and are presented alphabetically.

### **Access to waters**

Of those who answered this question, a few respondents raised concerns over EU or foreign vessels fishing in UK waters, stating that these vessels will deplete the UK's fish stocks. A small minority of those respondents also suggested that access to fisheries should be based on the best ratio of social and economic benefits to environmental cost, and a further response suggested foreign vessels should pay for access to UK waters.

### **Animal welfare**

A small number of responses raised animal welfare and called for it to be included in the JFS with a minority of those calling for animal welfare to be a fisheries objective in its own right. The responses came from interest groups, which indicated they would like to see commitments to humane holding and storage, mandatory labelling of seafood to indicate welfare standards, and funding for fish-welfare research in the JFS. A small minority of respondents particularly referred to welfare standards for crustaceans, specifically a ban on any mutilation of decapod crustacea for any purpose except veterinary.

### **Aquaculture**

Some respondents felt that the JFS could place a greater emphasis on aquaculture. These respondents wished to see more detail on site selection, combating sea lice, and exploring mollusc aquaculture. A small minority of respondents wished to see a strategy for development of regenerative aquaculture within the JFS.

## **Bycatch**

A few responses to this question referenced bycatch, highlighting the UK Bycatch Mitigation Initiative. A small minority of those respondents also suggested that the JFS should work alongside the Clean Catch UK objectives. One response from the supplier and retailer sector stated that as bycatch is dead or nearly dead when landed, it should be used for consumption.

## **Climate change**

A number of responses to this question highlighted a lack of content on climate change, and that more consideration of renewable energy and climate change initiatives is needed in the JFS. Other responses stated that fisheries should make a positive contribution to achieving climate change targets.

## **Control and enforcement**

There was a call for the allocation of funding to enable IFCA and other statutory bodies to fulfil their responsibilities to advise, support and enforce regulations on the fishing industry. Clarification on how these bodies will be required to comply with policies in the JFS was also requested.

Some responses referenced REM, suggesting it should have a section of its own, or called for REM to be mandated. Several responses also inferred that the control and enforcement text in the JFS should be strengthened.

## **Cultural dimension of fishing**

Three responses contained views on the cultural dimension of fishing, two of these called for the inclusion of fishing and underwater heritage in the JFS. The other response called for commitments to provide economic and social certainty to fishing communities.

## **Displacement**

Displacement was raised several times in response to this question. There was consensus that the JFS should address displacement to a greater extent, and outline how various users of the marine environment may cause displacement.

## **FMPs**

Several respondents added suggestions for FMPs, including that FMPs should focus on spatial and ecosystem management or that the management of shared stocks was missing from the proposed list of FMPs.

## **Food security**

Responses highlighted that the JFS doesn't link to wider legislation or policy on food security, that commercial sea fishing should be seen as a low carbon strategic food source, like aquaculture. or that both feeding the nation and protecting the environment needs to be understood.

## **Funding and resources**

Several responses called for more funding to be provided for the fishing industry, statutory agencies and science and research. This includes funding for green technology and modernisation, and funding for research on fish welfare. A small minority of responses also stated that the JFS does not address the financial pressures arising from increased fuel costs.

## **Gear and practice regulation**

A number of stakeholders welcomed the JFS's commitment to incentivise the use of more selective fishing gear, with some respondents calling for greater detail. Others called for fishing gear to be biodegradable and traceable.

## **Healthy marine environment**

A small minority of respondents called for the health of living systems to be a prime consideration, stating that health of the marine environment has not been considered sufficiently. Conversely, one response stated that the JFS is too environmentally focussed.

## **JFS Review/monitoring**

Many respondents agreed that the JFS should be regularly reviewed and monitored. A small minority of respondents would like more frequent JFS reviews, and another wanted to see more frequent FMP reviews.

## **Marine litter and pollution**

Respondents to this question argued that there should be actions or policy to address marine litter in the JFS, including plastic waste, with a small minority of respondents suggesting that a waste management section is missing. A further small number of responses from the recreational sector called for the cessation of sewage and agricultural run-off into waterways.

## **Marine spatial planning**

The consensus from those who mentioned marine spatial planning within this question was that it should be expanded in the JFS. Suggestions included adding targets for, and increasing the protection given to, MPAs, a call for the protection of migratory salmonids, implementing no-fish zones, and protecting underwater heritage through marine spatial planning.

## **Non-quota stocks**

A small number of responses viewed the JFS as a move towards sustainably managing NQS but stated that the JFS could be strengthened by including a forage fish policy. A minority of respondents called for more NQS management and clearer guidelines.

## **Participatory decision making**

Most responses to this question supported participatory decision making, suggesting this policy could be improved by including a clearer engagement policy. A small minority of respondents raised that some stakeholders may wish to add policies to the JFS to pursue only their own interests.

## **Production, marketing and consumption**

Several respondents called for a greater commitment to traceability and transparent labelling practices on seafood. Interest groups emphasised that these labels should include information on animal welfare. Some requested greater emphasis on the marketing of seafood, especially promoting seafood as a low-carbon, high-protein food source. Other respondents called for greater recognition of ports and harbours in the JFS. Several respondents requested explicit reference to the contribution made by seafood to the UK's food security.

## **Quota**

Some respondents argued that the JFS should commit to a preferential allocation of fishing opportunity to vessels, fishing methods and management that have a higher selectivity or other lower environmental impact, and those activities which bring increased sustainable economic value and employment to communities. A minority of respondents wished to see greater detail on quota assessment. A small minority of respondents argued for the redistribution of quota away from large companies.

## **Recreational sea fishing**

Several respondents argued that the JFS should focus more on recreational sea fishing, and some called for a UK-wide approach to be taken.

## **Science and evidence**

Several respondents welcomed the focus on 'best available scientific advice' in the JFS and agreed with the commitment that policy decisions should be supported by the best science and evidence. A science and research stakeholder argued that a fund should be created from levies on the most lucrative part of the fishing industry to support science and evidence. Others argued that information from fishers should be better incorporated into current science and evidence creation.

## **Sustainable fishing**

Several respondents highlighted the importance of promoting sustainable fishing. Some respondents highlighted that inshore fisheries management should protect juvenile fish and spawning grounds. Others argued that inshore fisheries should be promoted as a highly sustainable fishing practice.

## **Targets and deadlines**

The focus on the fisheries objectives was welcomed. However, there was a consensus that the JFS lacked targets. Subsequently, the JFS was sometimes perceived as failing to meet its obligations stemming from the Act. A few

respondents were concerned about the lack of policies and targets in wild capture fisheries.

### **Trawling and seining**

Of the small numbers of respondents who raised trawling and seining there were mixed views, with some wanting it banned, some wanting greater management or conversely, noting it is an environmentally kind form of fishing.

### **Vessel improvements**

Some respondents highlighted the need for improvements in the condition of fishing boats.

### **Workforce**

A few responses called for improved training of the workforce, and others called for the JFS to include more on workforce, including improvement in working conditions, sustainable labour and social requirements.

### **Wider international engagement**

All responses under this theme were from individuals. A small minority of respondents stated that section 4.2.1.13 on international fisheries negotiations (in the Consultation draft) falls outside the remit of the JFS. However, a small number of respondents mentioned that the reference to the UK's international agreements should be included in the JFS and contain stronger wording, highlighting that the important sustainability requirements in the Act must also be applied in the formulation of international as well as domestic policies.

### **Other issues**

Other issues raised individually regarding areas perceived as missing from the JFS included:

- cumulative impacts of marine users
- increasing recognition of harvest strategies, to strengthen the framework for management decisions
- the Crown Dependencies' role and status
- conflict resolution, particularly when balancing public and commercial interests
- making commercial fishing, as an extractive activity, subject to an Environmental Impact Assessment regime
- links to UK Marine Strategy (GES) and the energy strategy to be articulated more fully

- consideration of fluctuations in seafood trade conditions and arrangements under the Trade and Co-operation Agreement and Northern Ireland Protocol
- correlation with the UN's Sustainable Development Goals (SDG), particularly SDG 1, 2, 6, 8, 11, 13 and 14; and
- a join-up between management approaches across Devolved Administrations (DAs), particularly regarding licensing

### **Question: Further comments**

Given the wide scope of this question, and the range of responses received, the summaries within this section are mainly presented in the format of an alphabetic list.

#### **Access**

A minority of responses expressed concern about access to UK waters, particularly in relation to EU vessels, which were perceived to be unmonitored.

#### **Aquaculture**

Several respondents made reference to a wide range of aquaculture issues. These related variously to:

- purification facilities at harbours
- support for taking a welfare-based and welfare-friendly approach to aquaculture
- opposition to the expansion of finfish aquaculture
- a call for the reduction of aquaculture's reliance on wild fisheries for feed
- a call for new aquaculture development to be restricted to closed containment only and for open water farms to be phased out
- a need to emphasise the importance of aquaculture to food production, and for sustainable economic growth in rural and coastal communities; and
- keeping a continued focus on science and evidence and data collection

#### **Bycatch**

A number of respondents made various points about bycatch:

- bottom trawling has a high rate of bycatch mortality, and fishing gear should be modified to reduce concerns around animal welfare
- new bycatch monitoring and data collection programmes are needed to address bycatch
- a total ban on the dumping of bycatch is needed
- a fisheries management approach should be linked to the bycatch objective



- more detail is needed on bycatch mitigation policy, and guidance is needed on how non-compliance with bycatch measures will be monitored and enforced
- the bycatch objective should be re-defined to remove any impression that bycatch is a problem with all fisheries, and should cover non-quota stocks
- data on bycatch is limited in places, and should be assessed and co-ordinated with industry
- action to prevent and reduce bycatch within a specified timeframe is needed; and
- the Isle of Man should be allowed to create its own management policies regarding landing obligations

### **Climate change**

In relation to climate change, a few respondents variously said that:

- there should be more of an emphasis placed on climate change
- greater detail is needed on the availability of support in relation to climate change and net zero targets
- more focus should be placed on how fleets would adapt to the effects of climate change rather than on decarbonisation, mitigation and restoration; and
- a consideration of how climate change would lead to changes in species distribution is lacking

### **Coastal and freshwater**

There were some responses on coastal and freshwater:

- more detail is needed on measures to manage coastal and riverine freshwater environments; and
- the Environment Agency's role should be included

### **Control and enforcement**

There were a few suggestions in relation to control and enforcement:

- monitoring, control and surveillance of vessels should also be implemented for animal welfare purposes
- stronger control and enforcement measures are needed to address issues such as marine litter and the hidden ID registration of trawlers
- the mandatory use of REM for control and enforcement purposes should only be introduced following discussion and in line with the approach to participatory decision making

- the JFS should more explicitly state that the fisheries policy authorities will require the use of best available technologies as is reasonably practicable, which would include REM and Vessel Monitoring Systems, and it should be subsidised by Government; and
- there should be a commitment to require REM with cameras

### **Cultural dimension of fishing**

On the cultural dimension of fishing, there were views expressed by a few respondents that:

- angling is a key part of the culture of fishing
- marine cultural heritage should be afforded equivalent protection to that of natural seabed features in relation to fishing activity such as bottom trawling
- there is insufficient mention of Government's responsibilities to protect coastal communities; and
- the JFS and FMPs provide an opportunity for collaborative working and to support coastal communities

### **Displacement**

Some respondents variously mentioned displacement in relation to:

- there being growing levels of displacement
- the JFS being too weak on displacement, and calling for a stronger commitment to mitigating the economic and social impacts of fleet displacement
- the need to provide compensation; and
- raising awareness of the displacement pressures caused by offshore wind, and as a result of Highly Protected Marine Areas and MPAs

### **FMPs**

There were various views expressed on FMPs:

- FMPs represent good support for fisheries and seafood
- concerns that there would be "empire building" by management authorities
- more clarity and detail is needed, including on lower trophic level species, such as forage fish, which support stocks of commercial interest
- the fisheries management strategy for England should take priority over FMPs
- need to see more information on FMPs, and to see that they are participatory and evidence based; and
- fisheries managers must be legally compelled to comply with the FMPs

## **Food security**

There were two comments on food security:

- the JFS should prioritise food security and food production over other uses of the sea, priorities in international negotiations should be re-evaluated, and food security and environmental protection should be balanced; and
- there should be more emphasis on the contribution of wild capture fisheries to the UK's food security

## **Funding**

A number of respondents expressed views on funding:

- new fishing vessels should not be funded by the taxpayer, and private investment towards sustainable management should be encouraged
- funding for the promotion or development of recreational fishing should be properly reflected in the JFS
- science and evidence should be adequately funded and details provided
- co-management requires funding; and
- the JFS and FMPs must be underpinned by financial support

## **Gear and practices**

There were some comments from a few respondents on gear and practices:

- more research is needed on fishing practices such as welfare-minded fishing gear
- need for continued work on gear selectivity
- action is needed on bycatch, such as gear modifications; and
- the scientific gap on humane fisheries is acknowledged, humane stunning and slaughter onboard should be scaled up, and humane slaughter methods applied

## **Healthy marine environment**

On a healthy marine environment:

- conservation should be prioritised over economic considerations
- there is no recognition given to the UK being a signatory to the Convention for the Conservation of Salmon in the North Atlantic Ocean
- the burden of conservation falls only on UK fishers
- the JFS must integrate fisheries management with the broader targets to meet GES

- we should be growing and enhancing marine ecosystems
- most fishing methods are incompatible with an ecosystem-based approach
- the JFS should develop a life-cycle approach to fisheries management through the ecosystem objective
- ensure targeted action to sustain fish stocks and allow marine ecosystems to recover
- the human element of fisheries should not be isolated from the impact fisheries have on stocks, habitats and ecosystems; and
- further measures are needed to ensure effective ecosystem-based management and ocean recovery

### **Marine litter and pollution**

A few respondents commented on marine litter and pollution:

- concern about marine pollution and litter from discarded fishing gear
- those causing pollution should be taxed to fund net zero efforts
- there should be a total ban on causing pollution; and
- it should be recognised that a lot of fleets already remove all types of marine litter

### **Marine spatial planning**

There were a few comments on marine spatial planning:

- the JFS should set out how marine spatial planning would be done better; and
- there is an opportunity for the JFS to fully integrate commercial fishing into the marine planning system

### **Non-quota stocks**

On NQS a small number of respondents noted that while FMPs are proposed for certain stocks, additional plans for lobsters, crabs, langoustines, prawns and other non-quota stocks would be welcomed.

### **Participatory decision making**

There were some comments on participatory decision making:

- oppose the increased financial contribution from industry to facilitate participatory decision making
- co-management would require collaborative research and industry led science
- concerns about how engagement on FMPs would take place, and that it should involve all stakeholders from the outset in the development of FMPs

- the JFS needs to provide additional information on what is meant by co-management, when and how this will occur in relation to the development of FMPs, how it will be resourced, and it must involve industry; and
- co-management and engagement must have robust mechanisms in place to avoid a top-down approach, and it must be collaborative

## **Quota**

Several respondents commented on quota:

- the existing framework for setting quota should be adapted to one that defines limits rather than targets
- a greater share of quota should be allocated to small-scale, less environmentally damaging inshore fishing fleets
- the Isle of Man should have its own quota allowance
- the MSY approach is not a sustainable approach for recreational sea fishing
- MSY needs to be applied pragmatically and flexibly
- the precautionary objective, as it applies to MSY, requires clarification
- more metrics are needed for managing the marine environment, beyond MSY
- MSY is not sufficiently ambitious
- Maximum Economic Yield should be supported over MSY
- fishing should be in line with scientific advice, to restore stocks and maintain them above biomass levels capable of sustaining MSY; and
- the JFS should express a preference for the landing of catches of fish that are not managed by Total Allowable Catch

## **Recreational sea fishing**

There were several views expressed on recreational sea fishing:

- the JFS fails to recognise the importance of recreational sea fishing
- it must be stated that FMPs are also for stocks of interest to recreational fishers
- recreational angling dwarfs the economic impact of commercial fishing in England, and the socio-economic benefit of recreational fishing is far greater than that of commercial fishing in England and Wales
- fishing opportunities for recreational fishing needs to be covered, and fishing opportunities should be shared with recreational sea fishing; and

- more is needed to document the impacts of the recreational sector on stocks as part of the ecosystem approach, and recreational sea fishing should also be linked to the IUU section

### **Reviewing and reporting**

A few respondents mentioned review and reporting:

- greater detail is needed on the review and reporting process
- reviews of the FMPs should be made publicly available; and
- agree that the JFS should be subject to regular reviews

### **Seabed abrasion**

Comments on seabed abrasion were that:

- there is uncertain and contested data around seabed abrasion, and so the JFS should take a more nuanced approach; and
- bottom trawling damages benthic habitats and releases significant amounts of carbon

### **Supertrawlers**

The strength of feeling regarding supertrawlers was minimal, although bringing an end to illegal fishing by supertrawlers was mentioned.

### **Sustainable fishing**

There were various comments by respondents on sustainable fishing:

- the discussion on sustainable fisheries needs to include measures that can reduce the suffering of wild-caught animals
- Scottish salmon and rainbow trout farming is not sustainable, as it is causing damage to the environment and wild aquatic animals
- the JFS should recognise elasmobranchs by protecting vulnerable species and working to secure sustainable fisheries
- industry should take responsibility for the costs of sustainable management
- a strong policy statement for sustainable fisheries aligns with the aquaculture sector
- further measures to ensure environmentally sustainable fisheries should be included; and
- overfishing is closely tied to fish suffering and bycatch

## **Targets and deadlines**

Some respondents commented on targets and deadlines:

- clear dates and targets for decarbonisation of the industry must be implemented
- clearer targets should be set for the protection and extension of the MPA network
- time-bound, practical and realistic targets are needed to deliver the objectives via the FMPs
- a risk-based approach should be considered compared to a precautionary approach; and
- the precautionary approach as currently framed is not precautionary enough

## **Wider international engagement**

On wider international engagement, there was mention that consideration should be given to how international negotiations would interplay with FMPs, and engagement with the DAs and stakeholders.

## **Workforce**

There were some comments on workforce issues:

- concerns that the JFS doesn't consider the lack of new entrants, insufficient workforce and an aging demographic
- new fishers should undertake compulsory vocational training in ecosystem and marine management prior to obtaining commercial licences
- fishers should have adequate training in fish welfare matters; and
- creating jobs and attracting new entrants will take time and needs to align with opportunities created in future FMPs

## **Next Steps**

The fisheries policy authorities will give careful consideration to themes and recommendations that have been put forward by stakeholders. This analysis will be used to inform a final JFS which will be completed and published in November 2022. A full response to the consultation will also be published in November 2022. The consultation responses will be securely held for two years in line with retention policies.

## List of organisations that did not request confidentiality

- Angling Cymru
- Angling Trust
- Animal Aid Wales
- Aquatic Life Institute Europe
- Association of Inshore Fisheries Conservation Authorities (AIFCA)
- Association of Local Government Archaeological Officers (ALGAO)
- Bass Anglers' Sportfishing Society (BASS)
- Blue Marine Foundation
- British Spearfishing Association
- Ceredigion County Council
- Chartered Institute for Archaeologists and Council for British Archaeology
- Client Earth
- Community of Arran Seabed Trust (COAST)
- Compassion in World Farming
- Conservative Animal Welfare Foundation
- Cornish Fish Producers Organisation (CFPO)
- Cornwall Council
- Council for Nature Conservation and the Countryside (CNCC)
- Crustacean Compassion
- Eastern England Fish Producers Organisation
- Fish Legal
- Fish restaurant and angler
- Fishing into the Future (FiTF)
- Fishy Filaments Ltd
- Future Fisheries Alliance (FFA)
- Grimsby Fish Dock Enterprises Limited
- Historic England
- Holderness Fishing Industry Group
- International Transport Workers Federation (ITF)
- Isle of Man Government
- Joint Nautical Archaeology Policy Committee (JNAPC)
- Macduff Shellfish Ltd
- Mallaig & North West Fishermen's Association (MNWFA)
- Manx Fish Producers Organisation
- Marine Management Organisation (MMO)
- Marine Stewardship Council (MSC)
- Mid Ulster Council
- Monmouthshire County Council
- National Federation of Fish Friers
- National Federation of Fishermen's Organisations (NFFO)
- Natural England
- Natural Resources Wales (NRW)
- NE Scotland Fisheries Development Partnership
- New Economics Foundation (NEF)
- New Under Ten Fishermen's Association (NUTFA)
- North Atlantic Holdings Ltd



- North Eastern Inshore Fisheries and Conservation Authority (NEIFCA)
- Northern Ireland Federation of Sea Anglers (NIFSA)
- Northern Ireland Fishermen's Federation (NIFF)
- Northern Ireland Marine Task Force (NIMTF)
- Oceana
- Open Seas
- Orkney Fisheries Association
- Our Seas Coalition
- Perth and Kinross Council
- Plymouth Fishing and Seafood Association CIC
- Port of London Authority
- Project Speed UK
- Rest-O-Tank Ltd
- Rooney Fish
- Royal Commission on the Ancient and Historical Monuments of Wales
- Royal Yachting Association
- SafetyNet Technologies
- Salmon & Trout Conservation Scotland
- Salmon Scotland
- Salmon Scotland
- Save our Sea Bass (SOSB)
- Scottish Creel Fisherman's Federation
- Scottish Fishermen's Federation
- Scottish Society for the Protection of Animals (SPCA)
- Scottish White Fish Producers Association
- Seafood Scotland
- Seal Research Trust
- Shadow Minister for Climate Change (Welsh Conservatives)/Senedd Cymru
- Shark Trust
- Shellfish Association of Great Britain (SAGB)
- South Devon & Channel Shellfishermen Ltd.
- South West Fish Producers Organisation (SWFPO)
- SSE Renewables
- SSINGECO LTD
- Sustainable Seafood Coalition
- Tesco
- The Crown Estate
- The Marine Biological Association (MBA)
- The Office for Environmental Protection
- The Pew Trusts
- The Renaissance of the East Anglian Fisheries (REAF)
- The Wildlife Trusts
- Trondra
- United Kingdom Fish Producers Organisation (UKAFPO)
- University of Glasgow
- University of Southampton
- Waitrose
- Welsh Fishermen's Association

- Western Fish Producers' Organisation (WFPO)
- Whale and Dolphin Conservation (WDC)
- Wildlife Trusts Wales (WTW)
- World Cetacean Alliance

## **Annex 1- Consultation Questions**

Respondents were asked to provide answers to the following questions about themselves or their organisation.

- Would you like your response to be confidential?
- What is your name?
- What is your organisation
- What is your email address?
- From which nation are you based or do you have an interest in? (Select all that apply)
- Which of the following best describes your interest in the JFS (select one option that best describes your interest)

Respondents were asked to provide answers to the following questions about the draft JFS.

- Question: To what extent do you think the policies articulated in the draft JFS will achieve, or contribute to the achievement of, the fisheries objectives? Please explain your answer, with reference to specific content in the JFS where possible.
- Question: What are your views on the proposals for developing Fisheries Management Plans (FMPs)?
- Question: Are there any other areas of fisheries policy you think should be included in the draft JFS?
- Question: Our consultation questions have been designed to be broad and hopefully have given you the chance to meaningfully feedback your views on the draft JFS. If you have further comments please comment here: