

A joint response to the consultation on the draft Joint Fisheries Statement (April 2022) by:

The Northern Ireland Fishermen's Federation

and,

The Northern Ireland Marine Task Force.

The Northern Ireland Fishermen's Federation (NIFF) and the Northern Ireland Marine Task Force (NIMTF), welcome the publication of the Joint Fisheries Statement (JFS) for public consultation. As commercial fishing industry representatives and environmental NGO's, NIFF and NIMTF collectively recognise the importance of securing a sustainable fishing industry in Northern Ireland alongside the conservation and restoration of a healthy marine environment. The JFS is a welcome opportunity for the UK and Northern Ireland to deliver the ambition for *'world class, sustainable management of our sea fisheries and marine aquaculture across the UK'*.

The NIFF and NIMTF appreciate the developing nature of the JFS as the first step in a new future fisheries management framework, but agree that there are several important gaps in the draft JFS which need to be addressed or clarified:

- A need to frequently discuss and review specific and transparent actions to deliver in parallel environmentally sustainable and economically viable fisheries whilst protecting the marine environment:

If the JFS, and associated Fisheries Management Plans (FMPs), are to deliver the socio-economic and environmental benefits offered through the fisheries objectives and FMPs, ambitious, but achievable, commitments and actions are needed. Including transparent actions, which are frequently reviewed not only ensures effective delivery, it also reflects the urgency needed to respond to sectoral challenges such as crew availability, low market prices that do not reflect rising overheads and the twin climate and biodiversity crises.

- The need to deliver on all fisheries objectives through the Fisheries Management Plans and other tools:

We welcome the initiative set out by the proposals for FMPs but remain concerned on a lack of clarity as to how each of the fisheries objectives will be met within the FMPs and the JFS as a whole. It is not clear if all fisheries objectives will be assessed within each proposed FMP and how progress on each of the fisheries objectives will be assessed. The JFS must also include, or make reference too, any additional tools needed for wider fisheries management and in the delivery of all fisheries objectives including, for example, delivery of the climate change objectives, unintended impacts of displacement and non-quota stock management. The function of such tools, including the FMPs, must also be transparent with criteria-based assessments to ensure effective delivery of the fisheries objectives.

- The need for a comprehensive, four-nation approach, underpinned by adequate resource:

We acknowledge and welcome the retention of devolved powers in relation to future fisheries management, however, we also recognise the importance of cooperation and a four-nation approach to achieving the fisheries objectives. The Fisheries Framework is a welcome proposal as a mechanism to maintain future cooperation but specific detail on its delivery is lacking. For example, effective stakeholder engagement, at a four-nation and devolved level,

is a vital element of effective fisheries management, knowledge and initiative sharing and future policy formation. Given the complex nature of fisheries management, the wide remit of the fisheries objectives and the complexity of associated proposed FMPs (many of which may be interlinked across FPA boundaries), we would encourage substantive stakeholder engagement that is supported by adequate resources to ensure delivery. Furthermore, to enable effective decision making on resource allocation, adequate mechanisms must be included that allow sufficient flexibility to use such resources in order to best achieve the desired outcomes.

- A need to gather evidence to assess and address wildlife bycatch in NI waters:

We welcome the inclusion of the ecosystems objective, both part *a) fish and aquaculture activities are managed using an ecosystem-based approach so as to ensure that their negative impacts on marine ecosystems are minimised and, where possible, reversed, and b) incidental catches of sensitive species are minimised and, where possible, eliminated.* In relation to part b) we welcome the intention to address the unintended bycatch of sensitive species such as marine mammals and seabirds. However, in NI, we do not yet have a complete picture on to what extent such bycatch occurs. Following the evidence-based approach, we would recommend that an assessment of the level of bycatch of sensitive species in NI is undertaken first and coordinated with industry stakeholders, before recommendations can be proposed. We acknowledge the intention of the Bycatch Mitigation Initiative to address these issues, however, detail on the outputs and actions from this initiative are yet to be published.

The NIFF and NIMTF welcome the ambition of this landmark piece of future fisheries policy. In particular, we welcome commitments to deliver both an evidence and ecosystem-based approach to fisheries management. The former, positively commits us to a greater understanding of the needs of fishing industry alongside the and protection of the marine ecosystem and is vital in the delivery of the latter, an ecosystem-based approach that will ensure that *'the collective pressure of human activities is kept within levels compatible with the achievement of good-environmental status, and does not compromise the capacity of marine ecosystems to respond to human-induced changes'*. We welcome the ambition for evidence-based decision making, investment in new science and knowledge sharing, and creating new, well resourced, initiatives that will support both a sustainable fishing industry here in NI and ensure the environmental sustainability and protection of our marine environment for the future.

Kind regards:

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