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Submitted to Consultation on the draft Joint Fisheries Statement (Ymgynghoriad ar y Cyd-ddatganiad drafft ar Bysgodfeydd)
Submitted on 2022-04-12 18:05:00

Joint Fisheries Statement Consultation / Datganiad Pysgodfeydd ar y Cyd

1 Would you like your response to be confidential? / Hoffech chi i'ch ymateb fod yn gyfrinachol?

No / Na

If you answered Yes to this question, please give your reason / Os mai'ch ateb i'r cwestiwn hwn oedd 'Hoffwn', rhowch eich rheswm.:

2 What is your name? / Beth yw'ch enw?

Name /Enw:
Lucy Kay

3 What is your organisation / Beth yw enw'ch sefydliad?

Organisation / Sefydliad:
Community of Arran Seabed Trust (COAST)

4 What is your email address? / Beth yw cyfeiriad eich e-bost?

Email / E-bost:
email@arrancoast.com

5 From which nation are you based or do you have an interest in? (Select all that apply) / Ym mha wlad ydych chi'n gweithio neu y mae gennych fudd ynddi? (Dewiswch bob un perthnasol)

Scotland (Yr Alban)

If other please specify (Arrall Manylwch):

6 Which is the following best describes your interest in the JFS (select one option that best describes your interest) / Pa un o'r canlynol sy'n disgrifio'ch diddordeb yn y JFS orau (dewiswch un opsiwn sy'n disgrifio'ch diddordeb orau)

Other (Arall)

Other (Arrall - Manylwch):
Marine conservation charity

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7 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.

Answer here:

There is some positive commentary in the draft JFS and we welcome the recognition in the document of the following:
- A healthy and resilient marine environment is the foundation for a prosperous seafood sector and thriving coastal communities (page 6);
- Short-term economic decisions should not significantly compromise the long-term health of the marine environment (page 13);
- Alignment and integration with wider marine management mechanisms is essential (page 24);
- Industry should take a greater, shared responsibility for sustainably managing fisheries, while making a greater contribution towards the costs (page 24);
- Decisions should be mindful of the impact on coastal communities and yet not jeopardise the long-term recovery of stocks or delivery of a healthy marine environment (page 29);
- Fisheries policy authorities recognise that strong, clear and transparent governance arrangements should be in place, to ensure that appropriate engagement takes place and that decisions are taken at the right level (page 25), and;
- Fisheries policy authorities recognise that the protection, restoration and sustainable management of blue carbon habitats provides a nature-based solution that can support adaptation and resilience to climate change (page 38).

However, we must not ignore the fact that Scotland and the UK's marine environment is not in good health, as evidenced by continued failure to achieve environmental targets (for example Good Environmental Status (GES) across most descriptors) and halt biodiversity loss, as well as failure to secure lasting protection for climate change-mitigating blue carbon habitats.

We are at a critical point with the state of our seas, experiencing declining ecosystem health, productivity and resilience. Fisheries are key pressures affecting Scotland's marine environment, the Joint Fisheries Statement therefore needs to provide a robust policy framework that will deliver the reform required for sea fisheries and aquaculture to address and reverse current impacts.

It is, therefore, extremely disappointing and concerning to see that whilst there are some positive statements within the draft policies, their wording on the whole is vague and does not define clear and substantive policies and plans for fisheries management that will achieve the fisheries objectives. The draft policy statements are frequently just a statement of intended approach, rather than clear policy. As they stand, many of the draft statements are so open to interpretation as to be of little value in helping deliver meaningful change in fisheries management, which is what is required in order to meet the fisheries objectives and help deliver long-term environmental, economic and social sustainability.

The draft statements need to be revised to set out well-defined and substantive policies and plans that provide:
- Clear direction for action and decision making in relation to sea fisheries and aquaculture.
- Much greater clarity as to how the policies will help achieve, or contribute to achieving the fisheries objectives

Given the current poor state of Scotland and the UK's marine environment there is an urgent need to recover marine ecosystem health; to this end sustainability and ecosystem-based approaches to management should underpin all fisheries activity. This should be reflected in the JFS as overarching, non-negotiable principles that all policies and plans under the JFS must follow. Without this, it is not possible to see how the JFS will achieve or contribute to achieving the ecosystem objective and GES. There needs to be much more specific detail as to how fisheries will contribute to achievement of GES for commercial and non-commercial stocks, as well as the wider environment.

The draft JFS misses the opportunity to make much more creative use of spatial management, sector management and ecosystem-based management plans as effective tools for the sort of far-sighted, timely and bold action that we so urgently require if we are to recover marine productivity and provide a robust and resilient future for fisheries and the social, economic and environmental outcomes that it could bring. As a start, there needs to be a distinction in the JFS between inshore and offshore fisheries and the policies and plans for these. There should also be greater consideration and clarity around the relative impacts of different gear types along with policies that promote ecosystem-based and sector-focussed management plans, and which look at management measures over geographical areas or regions, rather than just focussing on single species plans. Scottish Government has commissioned reports that show that spatial management of fisheries would make sense financially as well as socially and environmentally. The JFS needs to provide the policy framework through which spatial fisheries management measures can be taken forward.

We welcome the recognition in the consultation document that fish stocks around the UK coast are a public resource and national asset. It is, therefore, essential that the public have a voice in decision making about fisheries management – not just in responding to consultations such as this one, but in the ongoing decision making around fisheries and fisheries management. In Scotland there is no means by which the public and other stakeholders can have input to fisheries management; the Regional Inshore Fisheries Groups (RIFGs) do not have the public or wider stakeholders represented on them. We recognise that the JFS will serve as a high-level delivery framework that applies across all UK administrations and note that its relevance for coastal communities will become clearer when it is transposed into national fisheries frameworks and policies. We do, however, think at this over-arching level that the JFS should include a policy that recognises the requirement for wider public and stakeholder input to fisheries decision making.

8 What are your views on the proposals for developing Fisheries Management Plans (FMPs)?

Answer here / Atebwch yma:

The current proposals for FMPs do not reflect the requirement for spatial management and an ecosystem-based approach and seem likely to disadvantage sectors that target species not covered by the FMP proposals.

The proposal for Scotland to restrict single species management plans to only a few quota species is extremely short sighted. In order to achieve or help contribute to achieving the fisheries objectives and GES there should be a requirement for plans for all commercially exploited species. In Annex A it is notable that whilst England and Wales are committing to FMPs for a much wider range of species (quote and non-quota) and gear types, Scotland is not. Why? This is a major shortcoming of the JFS as it applies to Scotland; it means that many fisheries, including the most highly impacting such as the scallop dredge fishery, are not subject to a specific management plan or public scrutiny. The failure to include all species and gears seriously undermines the stated aspirations in the JFS for sustainable fisheries that deliver social, environmental and economic benefits. Section 2(3)d of the UK Fisheries Act 2020 requires that fisheries policy authorities must set out their reasons for deciding which stocks of sea fish, types of fishing and geographical areas should be subject to fisheries management plans, and which should not. This information is not provided in the draft JFS.

The JFS should be revised to include a requirement for FMPs for all species that are fished in Scottish waters, and for FMPs to be developed within an ecosystems approach so that fisheries can be seen in the wider context of the environmental, social and economic costs and benefits. FMPs should be required to detail how they contribute to each of the fisheries objectives and report progress in relation to this.

The proposals for FMPs offer an opportunity for local input into fisheries management, but the development of the plans must be transparent and inclusive. There needs to be a clear commitment in the JFS for meaningful public and wider stakeholder involvement as an over-arching requirement for FMPs.

9 Are there any other areas of fisheries policy you think should be included in the draft JFS?

Answer here / Atebwch yma:

Yes. There needs to be clear commitment expressed in the JFS to preferential allocation of fishing opportunity to vessels that have a low environmental impact, and which bring increased sustainable economic value and employment to communities. This is a requirement of Section 25 (3) of the Fisheries Act 2020.

This would be most effectively taken forward through spatial management measures, underpinned by ecosystem-based approaches to enable a transition to low impact fisheries.

There is substantial evidence documenting the long-lasting impact of bottom towed dredge and trawl fisheries on seabed habitats, marine life and

ecosystems. In Scotland over 95% of the inshore waters are open to bottom towed trawl and dredge fisheries so the impact of these fisheries on the marine ecosystem as a whole is very extensive.

There is an urgent need to recover our marine environment for the wellbeing of all who depend on it now and into the future. Research has identified that a just transition to low impact fisheries in inshore waters would enable biodiversity, fisheries and ecosystem recovery with associated economic and social benefits.

10 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:

Enter text here / Teipiwch y testun yma: