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Comments on the draft outline of the Joint Fisheries Statement 4th Dec 2020

The Marine Conservation Society (MCS) welcomes the opportunity to comment on the draft outline of the Joint Fisheries Statement (JFS) that has been jointly developed by the Fisheries Administrations. Please find following some initial comments and suggestions for consideration in the JFS.

1. Foreword

- Not structure related, but just to emphasise the significance of the JFS and the need for the ambition to really match the expectations of stakeholders and to recognise the need to do things differently, for the benefit of our seas and coastal communities.

2. Introductory section

- When explaining how fisheries management works in a devolved context, it would be useful to include some content about the management of shared stocks, between both UK authorities and with neighbouring countries and the implications this has for sustainable management.
- Useful to explicitly state what the JFS is and what its scope is.
- The Fisheries Act applies to aquaculture and given the importance of aquaculture to UK seafood consumption, it should be included in the introduction, ideally under the header **“The importance of aquaculture.”** The text should include an outline of the UK aquaculture sector and could refer to – among other things - the English Aquaculture Strategy and the Scottish Salmon Producers Organisations Vision Statement.
- Scottish farmed salmon is the UK’s most popular fish, and is UK’s biggest food export. 2019 production figures reached nearly 204,000 tonnes, so not to include aquaculture throughout this document would be a serious omission.

3. The Fisheries Objectives

- This header might be best referred to as ‘The Fisheries Objectives of the Fisheries Act 2020’, to remove any possible confusion that these objectives maybe separate to the Act. As the Act and its objects extend to aquaculture, it’s not ideal that the name of the objectives excludes reference to aquaculture.

4. FMPS

- Might be best for this section to appear after the section on policies as it will be important to first understand to what extent the objectives are intended to be achieved by the FMPs specifically as opposed to other policy instruments / plans / initiatives.
- Will need to include a list of existing and new FMPs

- The FMPs will be the primary vehicle for delivering the fisheries objectives of the Act in practice and we believe will need to be far more comprehensive than the minimum criteria specified in the Act. The UK authorities should jointly look to build on progressive FMPs in place in other countries like the USA and Canada. In best practice examples, FMPs in these countries are comprehensive and adopt an integrated approach to management which has been the missing ingredient to date to successfully recovering and sustainably managing our fisheries and marine environment.

5. Delivering through our policies

- Under the section on delivering on our policies it would be useful to clearly outline which of the objectives of the Act will be met under each policy area. An alternative structure to this section might be use the objectives of the Act as the sub-headings.
- It would be useful to include what extent the objectives of the Act are intended to be achieved by the various policy areas in the JFS and what are to be achieved by other policy instruments / plans / initiatives.
- **‘Managing Stocks Sustainably’, ‘Fishing Opportunities’, ‘Science and Innovation’ and ‘Healthy, Resilient Marine Ecosystems’ are intrinsically linked and should be addressed together wherever possible within the JFS.** Ideally, the former three would be subheadings under the last – **‘Healthy, Resilient Marine Ecosystems’** or similar. Restructuring this section this way would importantly recognise the need for a more holistic and integrated approach to fisheries management, placing the health, and need for recovery, of the marine ecosystem at the centre.
- **Fishing Opportunities & Managing Stocks Sustainably**
 - The international dimension might need to be weaved into these as the policies of neighbouring countries that access shared stocks, and the outcomes of annual negotiations on fishing opportunities and access will have a bearing on domestic policies and approaches.
 - Aquaculture should not be included under ‘Managing Stocks Sustainably’ as the header is not relevant. Given the contribution of aquaculture to UK seafood supply, it should have its own heading rather than being included here. We suggest a standalone sub-header of **“Aquaculture Priorities”** (or similar). It is here that reference could be made to existing frameworks and plans, for example, the SEPA Finfish Aquaculture Sector Plan, English Aquaculture Strategy, SSPO Vision statement and Welsh Aquaculture Framework plans. To also include how aquaculture production is distributed throughout the UK, and what opportunities are available for the further development of low carbon, climate smart aquaculture, such as shellfish and seaweed farming.

- **Healthy, Resilient Marine Ecosystems**
 - For wild capture fisheries, this section should include policies relating to impacts on habitats, discards and bycatch, reducing carbon emissions and protecting, recovering and restoring blue carbon habitats.
 - For aquaculture, this section should include policies relating to fully integrated spatial marine planning to take into account multiple users and services that a water body provides, and the underpinning need for the protection and recovery of biodiversity, and joint approaches to incentivise low carbon and low impact aquaculture.

- **Production, Marketing and Consumption of Seafood**
 - Seafood labelling should be included under Marketing Seafood
 - Very few coastal communities are solely reliant upon fishing. When looking to support a community this should be taken into consideration.
 - For consistency, it is essential to include aquaculture in this section. Coastal communities, particularly in Scotland, are also dependant on aquaculture. The reduction and utilisation of processing waste should also be included, with a view to recycle it all into fish feed.

- **Science and Innovation**
 - This section also should include commitments to funding
 - Should specifically include joint approach to use of Remote Electronic Monitoring with cameras for wild capture fisheries
 - Should include agreed priorities to filling key knowledge gaps on shared resources and stocks
 - The UK is one of the leaders in science and innovation in aquaculture. With organisations such as the Scottish Aquaculture Innovation Centre, Scottish Association of Marine Science and the University of Stirling leading the way on a range of subjects such as feed formulations, health and welfare and shellfish production. We therefore think a new sub-heading of '**Innovation in aquaculture**' would be appropriate.

- **Governance, Engagement and Accountability**
 - Whilst enforcement and compliance are not specifically referred to under the objectives of the Act, they are fundamental to the achievement of the objectives and think it very important there is some consistency in approach across the UK administrations. As a result, we think some further sub-headings to cover these areas are needed.
 - We're pleased to see stakeholder inclusion and participation in decision-making. We'd be very interested in exploring different models and the establishment of formal stakeholder advisory groups (either regional,



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devolved or joint across the UK) before the completion of the JFS. We've worked on the EU Advisory Councils for several years and so have some insights that may be of use.