

## Response ID ANON-P6W3-G61K-9

Submitted to Consultation on the draft Joint Fisheries Statement (Ymgynghoriad ar y Cyd-ddatganiad drafft ar Bysgodfeydd)  
Submitted on 2022-04-12 22:02:19

### 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:  
Derek McDonald

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

Organisation / Sefydliad:  
NE Scotland Fisheries Development Partnership

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

Email / E-bost:  
derek.mcdonald@aberdeenshire.gov.uk

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):  
United Kingdom

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)

Public body (Corff cyhoeddus)

Other (Arrall - Manylwch):

### Joint Fisheries Statement Consultation 2 / Datganiad Pysgodfeydd ar y Cyd 2

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:

NESFDP is a cross party, cross-sectoral group hosted by Aberdeenshire Council which seeks to provide a communication channel between the wider fisheries industry and political representatives at all levels.

1. NESFDP acknowledges the high-level nature of the JFS and the difficulties in encapsulating in the text potentially divergent views amongst the four FPAs in a coherent way. The document nevertheless lacks definition and is highly repetitive. Moreover, readers seeking tangible, positive commitments hinted at in the Framework's Introduction will find the eight objectives a disappointment.

2. While the consultation opens brightly with an upbeat assessment of the ambition underpinning the Framework ('seafood sectors generate food, jobs, culture.....strong sense of pride and identity for their communities'.....'vibrant, profitable and sustainable fishing industry'), the relevant stated objective (7: national benefit) pales to a single perfunctory sentence (2.1.23) committing only to creating the conditions for fishing vessels to generate an unspecified 'economic and/or social benefit'. The JFS must include a clear and unambiguous commitment to optimising the use and management of quota and also, through government investment, to strengthen the entire catching and seafood industry supply chain to harness the immense opportunities presented by fisheries - one of the UK's greatest national assets - for the benefit of the people of the UK. And while fishing is described as low-carbon food in 2.1.25, the text goes on to adopt a highly defensive and disappointingly unambitious tone: 'action must be taken to minimise and mitigate the adverse effect of fishing, processing and aquaculture'.

3. The impact of climate change is referenced in 2.1.26 ('change to species composition.....control fishing activity on vulnerable stocks'). There is little mention of opportunities arising from the migration of other commercially useful species into UK waters, yet another example of the negative tone repeatedly struck in the draft JFS. 'Blue carbon' is mentioned eight times but no evidence is presented to substantiate its interface with fishing.

4. The Framework states (3.2.1) that the 'UK has the opportunity as a coastal state to fulfil its ambition to be a world leader in science' but commits (3.2.2) only to 'full use of the best available evidence'. This is contradictory and suggests a perpetuation of the continuing dependence upon the precautionary principle and desk-based research. This is not good enough. To deliver 'world leading' science, only a fully funded commitment by government to properly conducted long-term marine research including thorough stock assessments will do. NESFDP acknowledges that the marine environment is very dynamic and at times unpredictable, which makes investment in data gathering, analysis and international collaboration vitally important.

5. Section 3.6.2 commits to inclusivity in decision-making and to a strengthening of fisheries co-management. While this is welcome, the text fails to acknowledge fully the fishing industry's own long-term commitment to sustainable fishing for the benefit of future generations. And within the participatory decision-making arena, it will be important to balance the historic and legitimate interests of the fisheries industry and the proportionate representation of their scientific advisers when compared to the large number of single interest groups with views on fishing. Greater clarity is also required on how the impact of management measures can be measured and continuously refined to obtain the desired effect.

6. In 4.2.8, the Framework notes increasing spatial competition within the marine environment, which can lead to displacement for fisheries with consequent adverse impacts: socially, economically and environmentally. Offshore wind installations and associated anchorage and power cable networks pose a serious risk of spatial and electro-magnetic displacement to fisheries activities, While NESFDP welcomes the commitment to 'thoroughly test' and consult upon new proposals and policy change with marine displacement potential, NESFDP demands no less than comprehensive economic and environmental impact assessments for each individual proposal and/or policy change to safeguard fisheries interests. Moreover financial and other assistance should be made available to fisheries representative bodies to enable the sector to participate fully in consultations and evaluations related to new maritime developments and policy change which would otherwise severely stretch their capacity. The number of offshore wind projects under development is already extremely high.

7. 'Coastal communities' are referred to repeatedly in the text but appear only once within the list of objectives (under Sustainability: 'decisions will need to recognise the cultural importance of fishing through maintaining and, where possible, strengthening coastal communities and livelihoods alongside the requirement for fish stocks to reach and maintain sustainable levels'. While welcome, this commitment should be strengthened to recognise the potential for the fisheries and seafood sector to catalyse the economic regeneration of disadvantaged coastal communities, many of which have suffered severe hardship and decline over the past forty years.

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

Answer here / Atebwch yma:

NESFDP welcomes sight of the proposals for developing Fisheries Management Plans and will comment separately on the specific plan for Scotland.

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

Answer here / Atebwch yma:

The Draft JFS acknowledges the fishing-related complexities arising from the Northern Ireland Protocol which will continue to apply until the Northern Ireland Assembly decides otherwise. NESFDP members would welcome clarity on when normal trading arrangements might resume for locally landed seafood being shipped to customers in Northern Ireland.

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: