

Response to DEFRA consultation: Fisheries: Managing our quota in 2023 and beyond

Q1. Which option do you prefer for the new apportionment method and how long should this be in place?

The proposals continue to focus predominantly on a “business as usual” model that focuses on socio-economic considerations rather than the ecological foundations on which UK fisheries depend. A new apportionment method should be based on the following points:

- (a) In the Act, the precautionary objective should require that a precautionary approach to fisheries management be applied as suggested in the draft JFS in that the exploitation of marine stocks should be at levels that enable the restoration and maintenance of populations of harvested species above biomass capable of producing MSY. Based on current evidence-based thinking biomass should be maintained at a minimum of 120% of that which will achieve MSY (BMSY) for most stocks of commercial interest; the limit should be set at 30% of MSY. This value of BMSY should be taken to be 50% of that which would occur if the population was at carrying capacity (i.e. at its unfished level). Any additional quota should not be apportioned if the stock BMSY is below the 120% target.
- (b) If the stock is above the 120% BMSY target, then additional quota should be allocated to those sectors of the fleet that are least environmentally damaging in terms of the fishing methods used (e.g. deep sea trawling and dredging in areas with complex substrate should be reduced), have the lowest carbon footprint in an effort to meet net-zero targets, and provide most benefits to local communities (this may apply to some elements of the small-scale inshore fleet). For these reasons, zonal attachment is likely to be the preferable model, although the hybrid model would enable some flexibility to those tasked with making the management decisions. Certainly, the split should change from 90-10% so that zonal attachment gains a much larger share. The main problem with the track record approach is that it can reinforce a business-as-usual model, and while efforts have so far been made to consider fairness from the perspective of the administrations, there has been a lack of consideration of fairness and reward apportioned to the least damaging sectors of the fleet that benefit local communities. It is clear that the consultation document has considered this element in relation to the statement that historic uptake can “potentially perpetuate any current imbalances and prevent those who could fish this quota from having this opportunity”. By accounting for geographic location of the stocks, zonal attachment better aligns with the policy to achieve Net Zero targets.

Q2. If we used track record again, what reference period should we use?

We should reduce our dependency on track record and increase focus on zonal attachment, although a blended approach may be required, at least during a transitional period and to provide flexibility to the fisheries managers. However, the zonal attachment model should be regularly reviewed and updated in line with the scientific objective under the Act as emerging scientific information provides greater insight. This is especially the case as there are likely to be unforeseen consequences of climate change, including altered distribution of fish and spatial and temporal variations in their movements.

Q3. What additional exceptions, if any, should we consider why?

Using the capacity of fleets should not be used as an additional option as it could perpetuate the business-as-usual model. There may now, or in the future, be a case to reduce the capacity of some sectors of the fleet should stock status deteriorate (or remain below targets).

Q4. Which option do you prefer for managing these inward transfers of hake and anglerfish from Norway?

See response to Q1. Transferred quota that exceeds the threshold of previous years should only be allocated if the stock status is greater than 120% BMSY and where MSY is 50% of B0 (i.e. carrying capacity).

Q5. Why do you prefer this option?

See response to Q1 for an explanation.

Q6. Do you have any initial views on how we manage unallocated stocks and any ideas for improvement?

Sustainability should be given a high weighting in any allocation of these stocks. Only those sectors of the fleet that can demonstrate a strong sustainability performance (e.g. use of pole and line for tuna) and compliance with regulations / guidelines should be appropriately rewarded.

Q7. What do you think about how we have managed our bluefin tuna quota to date?

No comment.

Q8. What other options should we consider for future years?

No comment.

Q9. Do you have any initial views on the three areas for potential future review?

The index based approach to allocation of banked quota should be improved to reward those that use the least damaging fishing practices and produce lowest carbon emissions rather than those that are perceived to be the most in need. Underpinning should be further reviewed, and the management of anomalous quota stocks, e.g. for cod and skates and rays, should maximise transparency and sustain resource resilience favouring use of sustainability criteria.

Q10. Which distribution option do you prefer?

Consideration of the distribution of English additional quota between sector and non-sector pools needs a change of mind-set in which the potential to withhold quota from allocation is not perceived to be a negative waste, or a lost opportunity (e.g. in an effort to “ensure that quotas are not underutilised come the end of the fishing year”). Not using quota merely enables stocks to grow and become more resilient and should not be considered negative.

The further development of community quota management pilots could have much potential. Fishing plans (and indeed auctions) may provide a better option if sustainability criteria are given a high weighting, alongside social and economic factors.

Q11. Why do you prefer this option?

We should move away from the track record (historic uptake) option as this is not a good model when considering the sustainability and resource resilience perspectives. It can lead to the

perpetuation of the business-as-usual model that can focus too much on socio-economic benefits at the expense of the marine environment and associated resources.

The proposed criteria for Fishing Plans are good, although historic catch levels should be excluded as this can reward previous poor management and bad behaviours. However, caution must be taken when considering some sectors (e.g. small-scale family owned businesses) that may indeed have high sustainability credentials but are less able to innovate (i.e. because they have less resources with which to do so) and have the lack of experience and capability to prepare and submit tenders. In the case of the fate of quotas for which no plans were submitted, then the fish should be allowed to contribute to future production and ultimately resource resilience in the face of future challenges, e.g. shifts associated with climate change.

Auctions should be treated with caution if the benefit is purely for those likely to make best return on the investment, or that auctions could allow additional quota to flow to those who have the greatest ability to pay. There needs to be a greater focus on sustainability in the rationale stated.

Q12. Do you have any initial views on how we could use our reserve quota and how we can best ensure relevant catches are recorded and accounted for?

Reserve quota could be held back from allocation to enable stocks to grow so that the resource resilience is enhanced in the face of likely future challenges, thus enabling a contribution to food security. If they are allocated, they should be done so preferentially to those that can demonstrate ability to monitor, employ least damaging fishing practices, and lowest carbon footprints.