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Marine Biological Association written response supplied for Defra's call for views on the Joint Fisheries Statement, April 2022.

Written evidence submitted via email by Dr Matthew Frost, on behalf of the Marine Biological Association to Defra at jfs@defra.gov.uk.

- The Marine Biological Association (MBA) is a Learned Society established in 1884 and incorporated by Royal Charter. The MBA currently has c. 1700 members (including international members) and runs The Laboratory in Plymouth where it has maintained its own research program since its inception in 1887.

- The core of MBA membership is its professional marine biologists and the MBA invites its members to provide input on a range of issues. The MBA therefore provides a 'clear independent voice to government' on behalf of the marine biological community. Any evidence provided is therefore informed by the submissions of MBA members.

Questions

Question 1: Would you like your response to be confidential?

No.

Question 2: 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 you answer, with reference to specific content in the JFS where possible

2.1 The JFS has the potential to provide a significant contribution to the achievement of the fisheries objectives if the ambitious policies are implemented with adequate resourcing, a sense of urgency and appropriate use of an evidence based approach to work with the environment and natural biological processes. There are, however, a few aspects that require further consideration and these are articulated below.

2.2. One of the positive aspects of the consultation is the repeated references to scientific evidence. It may seem trivial therefore but the list of organisations identified as to which 'the consultation has particular relevance' does not include scientific organisations / bodies' (**JFS P7 - Purpose of consultation)**. The UK has many world-leading marine scientific university departments, laboratories and societies and it is vital they are included in the work going forward to implement the Fisheries Management Plans (**JFS section 5 FMPs**) as well as for gathering information on Climate impacts and blue carbon. The issue of broader scientific engagement is particularly relevant to section 3 with the commitment to a "*Good science and a robust evidence base to inform policy and management decisions*" (**JFS 3.2.1**). We suggest this category of stakeholder is included in all future consultations / stakeholder engagement.

2.3. Another aspect of the JFS is in its use links to other policies and statutory legislation to help achieve its objectives and to help those areas meet their own goals. Marine Protected Areas are noted as a way to "*reduce the effects of fishing on the marine environment and on stocks of marine carbon during the lifetime of the JFS*" (**JFS P22**). **Section 4.2.10** specifically contains a commitment to managing fisheries activities to help achieve conservation objectives (further articulated in **JFS Section 2, P75**). The issue here is that despite MPAs being in place for a number of years there has been criticism of the amount and type of fishing activity allowed to take place in MPAs. It would be good therefore to be clearer on targets and specific commitments to reducing fishing impacts in MPAs. This also leads to another omission in the policies, which is reference to the benefits of Highly Protected Marine Areas (HPMAs). Although the consultation from Defra on proposals for HPMAs is yet to be announced, there is a broader commitment to establishing HPMAs with one of the benefits being to fisheries via overspill effects, connectivity and the broader benefits to the marine environment. The JFS should therefore include both support for HPMAs as part of its approach to achieving sustainable fisheries as well as a commitment to working with stakeholders to articulate the benefits. Linking to other policy areas to help achieve objectives will only work if those policy areas (in this case MPAs) are also fit-for-purpose in their implementation.

2.4. Another example related to point 2.3 above is in the use of the objectives in the JFS to help meet targets in the Marine Strategy Regulations (**JFS 4.1.2 & 4.1.7**). Many of the GES targets for Descriptor 3 (commercial fisheries) however have not yet been met so there needs to be a clear articulation of how policies outlined in the JFS will align with the GES work and lead to improvements including robust indicator development and programmes of measures. There has been some criticism of the lack of quantifiable targets for some MSFD descriptors and slow progress on demonstrating improvement - this should not be a reason for delayed or inadequate delivery of the JFS policies. In summary, the JFS needs to show how it has led to improvements in MPA management and achieving GES. Matching the current achievements of other policy objectives will just result in business as usual whereas there is a clear need for a new way of doing things in order to prevent further deterioration of fish stocks and the wider marine environment.

2.5. The high prominence of the Precautionary Principle (PP) is welcomed (**JFS 2.1.6**) but the wording (**JFS 2.1.7**) stating that the fisheries policy authorities "*will respect the precautionary approach*" is vague. There is a repeated commitment in the JFS to implement the Precautionary Principle but little detail on how this could work in practice. The statement of the **JFS 4.1.8** is helpful but is heavily caveated ("*Fisheries policy authorities will aim to mitigate against negative outcomes for the environment, whilst having regard to the needs of fishing communities as required under the sustainability objective and the national benefit objective*". It is vital that the PP is implemented fully and the MBA welcomes the commitment to its implementation.

2.6. There have already been reports on fisheries and aquaculture in relation to the climate change objective (**JFS 2.1.24 & 2.1.26**). We are pleased to see reference to the Marine Climate Change Impacts Partnership (MCCIP) (**JFS 4.2.13.8**) that has already published reports on 'climate change adaptation in UK seafood: (https://www.mccip.org.uk/all-uk/solutions/uk-wild-capture-seafood-industry) and climate impacts of fish, fisheries and aquaculture (https://www.mccip.org.uk/all-uk/special-topics/fish-fisheries-aquaculture) as well as fed into the CCRA reporting. MCCIP will continue to update its reporting on fisheries and climate change as well as focus on solutions for the sector so utilising the MCCIP network particularly in relation to The 'scientific evidence objective' (**JFS 2.1.14**) will be crucial.

2.7. A reference to the wider scientific community should be included as examples of where to obtain the "Best Available Scientific Advice" (**JFS 3.2.4**). Organisations with statutory responsibilities (e.g. Cefas) or with official advisory roles (ICES) clearly have the primary responsibility for providing evidence and advice. The wider scientific community, which is not necessarily part of the official statutory community, if not clearly in scope can lead to important evidence being missed. For example the MBA does not undertake statutory evidence gathering or monitoring at its CH research base but historical trawls have now developed into the world's longest fisheries independent surveys. There needs to be a reference to the wider science community here including specific mechanisms for engagement with the community such as the Healthy and Biologically Diverse Seas Evidence Group (HBDSEG). Many of the indicators for fish and for the wider marine environment are being developed by HBDSEG who are delivering on some of the policies in the JFS (e.g. monitoring – **JFS 3.2.13** & GES indicator **development JFS 3.4.1**) and these links need to be utilised and a process for engagement established.

2.8. Recreational fishing (**JFS 4.2.15**) is an important activity that needs to be central to any policies on fishing and the marine environment. It is good to see it included in the policies here but there is little detail here as to plans for this sector including on how the scientific evidence (**JFS 4.2.15.2**) will be gathered so it appears as an 'afterthought'. Previous work by MCCIP for example has shown that this sector is often underestimated in terms of size and economic importance.

Question 3: What are you views on the proposals for developing FMPs?

2.9. The Fisheries Management Plans need to include an element of horizon scanning and taking into account modelling of scenarios over a range of temporal scales. The project "Marine Spatial Planning Addressing Climate Effects (MSPACE)" is producing models to inform the design and implementation of climate-smart marine spatial plans (https://www.smmr.org.uk/funded-projects/marine-spatial-planning-addressing-climate-effects-mspace/). This project will also inform the aims stated in the **JFS 4.2.9.1 & 4.2.9.2** and a focus on future scenarios (including socio-economic data) needs to be a key element in the development of FMPs.

2.10. It is noted that "*The Act requires the relevant authority or authorities to review a FMP whenever they consider it is appropriate to do so, and in any event within 6 years of its publication or most recent review*" (JFS 3.3.2). The Fisheries Policy Authorities should make every effort to coordinate timing of the FMPs - mobile species such as fish do not recognise political boundaries. It also makes sense to coordinate in order to ensure consistency of management approach, sharing of new data and information and making sure plans are complementary when dealing with shared resources and dealing with transboundary issues.

Question 4: Are there any other areas of fisheries policy you think should be included in the JFS?

2.11. As noted in point 2.8 above, the information on recreational fishing is sparse and requires more detail.

2.12. There is only one reference to the development of labelling and accreditation schemes (**JFS 4.2.16.10**). Understanding consumer behaviour and the part public engagement and education play in facilitating change is vital. It has been demonstrated repeatedly that real. Significant change occurs when there is a change in public perception that leads to a desire for action (e.g. plastics) in addition to top-down regulation based on expert advice. There needs to be a clearer plan to work with consumers (the public) and suppliers (supermarkets and others) to facilitate the change required for a move to sustainable fisheries. Social and behavioural studies and health and well-being research is all relevant to fisheries management and is an expanding area of science so a focus on this area would be appropriate as FMPs are developed.