

## **Consultation (second phase) on the European Fisheries Fund UK DARD Draft Investment Plan**

### **Northern Ireland Marine Task Force (NIMTF) Response**

We welcome the opportunity to respond to this consultation on the European Fisheries Fund (EFF) UK Operational Programme (OP) and Draft Investment Plan, and we look forward to contributing to ongoing discussion on the funding priorities for EFF within Northern Ireland. We hope the EFF will provide opportunities to make Northern Ireland's fisheries sector a truly environmentally, economically and socially sustainable industry.

The Northern Ireland Marine Task Force (NIMTF) is a partnership of non-governmental organisations in Northern Ireland, comprising of RSPB, WWF-NI, Ulster Wildlife Trust, Friends of the Earth, the Wildfowl & Wetlands Trust, the National Trust and Northern Ireland Environment Link. The partnership is funded by the Esmee Fairburn Foundation and the Tubney Charitable Trust.

We have some general points to make, concerning the various axes of the fund and the Department's initial intended areas of spending. We have then given opinion in response to the questions posed by DARD on the specific sections of the OP.

#### **General points**

With regard to fisheries, the NIMTF want to see a fishing sector that reflects the three strands of environmental, social and economic sustainability. For fisheries that rely on the capture of wild target species, there is a particular need to recognise that these three strands of sustainability are intrinsically bound together. Without environmental (i.e. ecological) sustainability, there is no way that the fishing sector can remain economically or socially sustainable in the long term. EFF aid should be targeted at reducing the impact of fishing, whilst simultaneously increasing the value of what is produced by the sector and related communities, thereby generating 'more from less'.

The purpose of the EFF, as we understand it, is to develop a fisheries sector in Northern Ireland that is sustainable and profitable, and that is managed through coherent marine policies. The fishing sector should be rewarded with public funds for any additional public goods and services that it can provide; such as measures undertaken towards reduction of its ecological impact upon the marine environment.

It is essential that Northern Ireland recognises that for the industry to become profitable in the long-term, it must increase the market value of the products yielded from its fisheries, and increase its ecological sustainability.

The Council regulation for EFF states in article 38 that the EFF “...*may support measures of common interest that are intended to protect and develop fauna and flora...*”, including “...*the protection and enhancement of the environment in the framework of NATURA 2000...*”. The allocation of EFF financing measures within or around European marine sites (SPAs/SACs) under the NATURA 2000 framework for marine and aquaculture sites needs to be commensurate with the management needs of those sites with regard to fisheries and aquaculture. Therefore, EFF should be used to ensure that fisheries practices in European marine sites are compatible with site objectives for marine protection, particularly if significant changes to fishing practices, gear or effort are required in order to achieve this.

Throughout the Draft Investment Plan, it is stated that EFF will be used to facilitate methods of reducing bycatch, and therefore discards. It is crucial to note however, that environmental sustainability of fisheries is based on far more than the sustainability of individual target species, but on mitigation of impacts to the wider marine environment (i.e. the ‘ecosystem approach’). In this respect we would advocate that priority be given under EFF to undertaking measures to reduce the impact of fishing on the ecological functioning of the marine environment, either through fishery specific measures, or through spatial management measures such as marine protected areas (see below).

We strongly advocate that EFF monies be used to investigate trial marine reserve areas where mobile fishing gear would be prohibited. EFF funds in such a scenario would be used to offset displacement issues arising from alternate management within protected areas. The EFF should also be used to fund the collection of information, scientific or otherwise, necessary to designate a trial area in Northern Ireland's waters where fisheries resources, for example spawning areas, should be protected. A proportion of the fund should be used to monitor the effect of the project upon fisheries resources in adjacent areas, and to see if this type of spatial management has overall benefits to fisheries returns. There is an array of studies of such projects globally which show economic benefits to fisheries, but many of these sites are selected and protected on biodiversity criteria, not for reasons of fisheries management. Work is needed, therefore, to explicitly explore marine protected areas for fisheries management.

## Responses to specific questions:

**Section 3:** *Do you think that the issues raised in “Strategic context for investment” are the most relevant or are there other things you think we should have covered?*

1. We would support the overarching aim of the National Strategic Plan, for a fisheries industry that is sustainable, profitable, and managed effectively as an integral part of coherent policies for the marine environment, and for EFF to be used to deliver this aim. We are pleased to see that the plan intends to make steps towards achieving sustainability (3.3.2 to 3.3.5) by gathering information on stock levels, mortality, bycatch, discard and fishing effort to inform sustainable management plans.
2. Importantly, we note that the stated aim of this and similar exercises is to ensure that fishing effort is maintained at a level that can ‘...*guarantee abundant fish stocks in the long term...*’. However, the measures indicated are mainly directed at increasing specificity of gear to reduce discards and increase species-specific fishing. While the NIMTF supports the view that discard reduction is a vital issue to address, there should also be focussed plans to incentivise initiatives that alleviate the damage fishing can cause to the *wider* marine environment (e.g. cumulative damage to benthic species and habitats from mobile gear use). A functioning marine ecological system is essential for commercial fish stock levels to be maintained or increased, whether this is in the form of the provision of refuge for juvenile or spawning species, areas for larval recruitment, or in terms of promoting viable food-chain communities that may potentially allow diversification into future fisheries. We would therefore urge that some priority is given via investment to exploration of the impacts of various fishing techniques, in order to mitigate and reduce the overall impact of fisheries upon the *wider* marine environment. This may be in the form of investment in new gear, or spatial management and protection of fishery resources.
3. We would fully support the use of a proportion of the EFF being used to achieve accreditation of Northern Ireland fisheries under the Marine Stewardship Council (MSC) scheme. The rationale behind this scheme is to provide a benchmark of sustainability to consumers, and it is something that is becoming more prevalent for fisheries worldwide. If fisheries in Northern Ireland can attain MSC certification, the competitiveness of those fisheries would be increased, and EFF monies would be well spent in this regard.
4. The NIMTF fully support the recognition that the inshore sector and the wider marine environment on which it depends are coming under increasing pressure from human activity and environmental change. It is vital that this recognition is acted upon in order to maintain and enhance an ecologically diverse and healthy marine environment, which will be a vital part of maintaining a viable and profitable sector. To reiterate the previous point however, achieving this aim is

dependent not only upon controlling fishing *effort* at sustainable levels, but also upon minimising overall impact to the ecological integrity of the *wider* marine environment.

**Section 4:** *Do you think that measures included in the NI Investment Plan are appropriate to the needs of all stakeholders?*

5. We support measures under Axis 1 for adapting the fleet, specifically for the purposes of increasing gear selectivity, reducing bycatch, and reducing the ecological impacts of fishing techniques upon the wider marine environment.
6. Similarly, any measures that could be promoted under EFF for the reduction in the ecological and environmental impacts of aquaculture activities would be welcomed.
7. If the ecological impacts of fisheries could be demonstrably reduced, and accredited via MSC, we would advocate further use of EFF monies to actively promote and market NI fisheries products as environmentally-benign, sustainably-produced, premium products. The consumer demand for eco-labelled seafood that has been sustainably caught is increasing, and EFF could be used to capitalise on this trend. This potentially also falls under Axis 3, Article 40.
8. We support measures proposed under Axis 5 (Technical Assistance) but would urge that under these measures, there are plans to fund technical assistance for the purposes of minimising the wider environmental impacts of fishing, in addition to monitoring of fishing effort and assisting measures for discard reduction.

**Section 4:** *The EFF provides for the possibility to support some measures which have not been included in the Department's proposals. Do you agree that these should remain excluded?*

9. We would question why there is no inclusion in the draft Investment Plan for national measures for the conservation and management of fisheries resources and to minimise the effect of fishing on the conservation of marine ecosystems (CFP basic regulation, article 9). These measures could potentially be used to establish trial marine protected areas for the benefit of protecting commercial species resources (see above), in addition to trial measures for reducing the fisheries impacts upon marine habitats.
10. The measures proposed under Article 38 in the UK Operational Programme (OP) and NI Investment Plan (Measures to protect and develop aquatic fauna and flora) applies only to species that have a partially fresh-water life cycle and are targeted by recreational or commercial fisheries (i.e. salmon, trout and eels). However, we strongly advocate the inclusion of measures in the Investment Plan under article 38 for the protection and enhancement of the environment in the framework of NATURA 2000. Northern Ireland has a number of existing European marine sites under NATURA 2000, and will have progressively more. EFF should be used to ensure that fisheries activities do not impact upon NATURA 200 site features, for example modifying vessels to use environmentally friendly gear, appropriate to the site, for which the owner could then be funded.
11. The EFF provides for the possibility to support aqua-environmental measures for participating in the EMAS scheme (Eco-management and Audit Scheme). We would question whether DARD intends to promote participation in this scheme under EFF funding. Similarly, we would like to see specific reference under Article 30 in the Investment Plan for measures to ensure that sustainable aquaculture is compatible with the environmental constraints resulting from Natura 2000 sites.
12. With regard to processing and marketing, the EFF states that measures for the marketing of products originating from local landings and aquaculture would be eligible for aid. We would be supportive of such measures being included in the Investment Plan for Northern Ireland, as long as safeguards were in place to ensure that such fisheries were truly sustainable. In addition to the emerging market for sustainably produced seafood, there is also a developing market for food that has been produced locally. The potential of capitalising on this trend is one of reducing overheads and increasing profits, without necessarily increasing production or environmental impact.

**Section 4:** *What do you think about the proposed final split (see 4.7) across the five EFF priority axes?*

- *Do you think we should be spending more in one Axis and less in another?*
- *Do you think the split is realistic in terms of potential uptake and spend?*

13. We would like to be involved in the development of proposals for splitting EFF across the five axes.

**Section 5:** *What do you think about the proposed implementation arrangements for Northern Ireland?*

- *Whether you foresee any difficulties or problems with these arrangements?*
- *Do you have any suggestions for how they can be improved?*

14. We would like to be involved in the development of implementation arrangements as they progress.

## Summary

The NIMTF welcomes the publication of the EFF Draft Investment Plan, and hope it will provide the opportunity to make Northern Ireland's fisheries sector a truly environmentally and economically sustainable industry. The focus of EFF should be on reducing the impact of fisheries, but increasing their value, where possible.

We look forward to taking part in the DARD fisheries forum and engaging on issues towards ensuring the sustainability of the fishing sector Northern Ireland.