The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Live Here, Love Here, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust, Causeway Coast & Glens Heritage Trust and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to: Consultation on the Draft Irish Sea Demersal and Pelagic FMPs

Submitted: 21st October 2026

NIMTF thanks DAERA for the opportunity to respond to both consultations on the Irish Sea Demersal and Pelagic FMPs. These set the start of a long-awaited process to achieve sustainability to a fishing sector and associated environmental habitats which have both been showing declines and require strong actions to achieve objectives and positive outcomes for both areas. Our responses below highlight areas where we can strengthen existing commitments and statutory obligations to ensure that there can be outcomes for a thriving sustainable fishing sector which promotes marine recovery through an ecosystem-based approach to fisheries management.

1. Do you have any comments on these common sections in either of the draft FMPs?

NIMTF have noticed that the main focal point of implementing Maximum Sustainable Yield (MSY) is put in place, but there seems to be a distinct lack of recognition towards the national frameworks such as the UK Marine Strategy[1] and achieving Good Environmental Status (GES). Both FMPs provide key elements and strengths which are not always replicated in the others. MSY has been highlighted as "The FMP must contain policies which at least contribute to restoring or maintaining the stock at MSY" - NIMTF would highlight that an ecosystem-based approach to achieving above MSY is a standard rather than "at least contribute to". As has been highlighted previously by NIMTF and our members, under the UK Marine Strategy, we are currently failing 13 out of 15 indicators[2] (2024 assessment) which relate directly to the health of our oceans. A Programme of Measures (POMs) already exists through a series of metrics under each indicator and these highlight the intersections with the fishing sector. Whilst the UKMS does get a mention, it is far more than just "D1 Biodiversity, D3 Commercial Fish and Shellfish, D4 Food-webs, D6 Seafloor Integrity and D10 Marine Litter" and we have highlighted where specific actions can be amplified to ensure greater links to the relevant indicators.

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1 https://moat.cefas.co.uk/introduction-to-uk-marine-strategy/

2 https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status/

3 https://www.gov.uk/government/publications/marine-wildlife-bycatch-mitigation-initiative/marine-wildlife-bycatch-mitigation-initiative

There are some strengths which each FMP has which could be utilised to strengthen the other:

- The Irish Sea Demersal FMP highlights greater interactions with other marine developments such as Offshore Renewable Energy, whereas the Pelagic FMP is much lighter on this.
- The Irish Sea Demersal FMP discusses the role of the UK Bycatch Mitigation Initiative[3] than the Irish Sea Pelagic FMP does - replication of this should be present across both FMPs to ensure they reflect tackling this shared challenge.
- There should be a greater focus on building resilience of the fishing sector to the impacts of climate change, rather than just building a just transition from utilising fossil fuels to electrification.
- Both FMPs however use words which weaken the policies and the actions associated with. Terminology such as “consider” or “may” weakens the responsibility set out in the Joint Fisheries Statement for Government Departments to put FMPs in place and weakens the statutory obligations under the Climate Change (Northern Ireland) Act 2022[4], the Marine Act (Northern Ireland) 2013[5] and the Joint Fisheries Statement (JFS) 2022[6].

The JFS itself states:

“As part of being an independent coastal State, the fishery policy authorities will work together to support a vibrant, profitable, and sustainable fishing and aquaculture sector supported by a healthy marine environment that is resilient to climate change.”

It is critical that this is maintained and the policies and actions which are detailed within both FMPs reflect this joint statement outlined above. The FMPs go some way to achieving and outlining this, but it misses the mark on encapsulating enough action and emphasis towards achieving these objectives. We have already seen delays to the finalisation of FMPs by 2 years due to the required amendments to Annex A of the Joint Fisheries Statement[7], allowing an additional 2 years to develop these FMPs. As a result of an additional 2 year delay, NIMTF has a single request - we cannot afford to water down the policies within these FMPs which would further add to the delays in achieving the objectives of the FMPs themselves.

The requirement of Remote Electronic Monitoring (REM) as a ‘trial’ rather than as an implemented roll-out action is disheartening given the potential to further the information that can be gained through the use of REM and Inshore-Vessel Monitoring Systems (I-VMS) combined. A combination of cameras and sensors can provide additional telemetry for the fishing sector which can contribute to multiple actions.

In addition to our response, NIMTF would recommend assessing alignment within fellow members RSPB and Shark Trust responses.

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4 https://www.legislation.gov.uk/nia/2022/31/contents/enacted

5 https://www.legislation.gov.uk/nia/2013/10/contents

6 https://www.gov.uk/government/publications/joint-fisheries-statement-jfs

Demersal FMP

2. Do you have any comments on the policy goals in the draft demersal FMP?

NIMTF have great concerns with the specific wording for all of the policies contained within the Irish Sea Demersal FMP. The inclusion of the word 'Goal' has significant impact to the overall impact and intention of what this draft FMP will achieve. The precise definitions[8] are outlined below:

Goal - "A goal is a desired end-state - an outcome a society aspires to. It is broad, visionary and often value-laden. Ensuring universal literacy, eradicating poverty or reducing maternal mortality are all examples of goals. They give direction and purpose to governmental action."

Policy - "A policy, in contrast, is the deliberate course of action chosen to achieve such a goal. As one textbook framings puts it, a policy is essentially a preferred outcome that a society seeks to fulfil when viewed from the goal side, while the policy itself is the route selected to reach it. Policies may take the form of laws, programmes, regulations, subsidies, or administrative guidelines."

Given the above descriptions, we have concerns that the policies outlined within this FMP merely give **direction** rather than outline a **route** to achieve the outcome. Whilst we respect that not every aspect of an FMP can be prescriptive, there are strict components and a purpose to the creation and development of an FMP.

Below NIMTF have indicated where the wording of each action can be strengthened in **bold** where wording can be amended below in Table 1.

Table 1. Current and Amended Wording for Action Points within the Irish Sea Demersal FMP.

Policy Goal	Current wording	Amendments
1	Harvest the stock of Sole sustainably, at a level commensurate with Maximum Sustainable Yield	Remove 'Goal' Harvest the stock of Sole sustainably **through an ecosystem-based approach to achieve** Maximum Sustainable Yield **(MSY) and support GES under the UK Marine Strategy**.
2	Harvest stocks of Cod, Whiting, Haddock, Plaice and Nephrops sustainably, contributing to restoring and maintaining the biomass above the level capable of producing MSY.	Remove 'Goal' Harvest stocks of Cod, Whiting, Haddock, Plaice and Nephrops sustainably **through an ecosystem-based approach**, contributing to restoring and maintaining the biomass above the level capable of producing MSY.
3	Support evaluation of the impact on fish stocks and fishing fleets from other developments impacting upon marine	Remove 'Goal' **Assess the** evaluation of the impact on fish

	habitats.	stocks and fishing fleets from other developments impacting upon marine habitats **to achieve GES for 'Benthic Habitats', 'Seabirds', 'Food Webs', etc.**
4	Support ecosystem-based sustainable management by minimising the impact of Irish Sea Demersal fisheries on the marine ecosystem.	Remove 'Goal' Support **and deliver an** ecosystem-based **approach to** sustainable management by minimising the impact of Irish Sea Demersal fisheries on the marine ecosystem **and achieve GES under the UK Marine Strategy**.
5	Support progress towards sustainable fishing by maximising any economic and social benefit.	Remove 'Goal' Support progress towards **ecosystem-based, adaptive** sustainable fishing by maximising any economic and social benefit **without negatively impacting the marine environment**.
6	Minimise the impact of fish activities on climate change and support the fishing industry to adapt to climate change.	Remove 'Goal' Minimise the impact of **fishing** activities on **contributing to** climate change and support the fishing industry to adapt to **impacts of** climate change **on quota species**.

3. Do you have any comments on the possible actions identified under the respective goals?

NIMTF have concerns regarding the wording of some of the actions - the use of "may", or "consider" in the majority of actions weakens the strength and robustness of the actions, which inherently weakens achievement of the policy 'goal'. Given that NIMTF have previously outlined that policy 'goals' drive direction rather than a route to achieving, NIMTF have concerns that by maintaining these weakening words, it undermines the entire point of developing an FMP. It is increasingly important that the actions not only address MSY, but they also go further to meet the assessments and indicators of achieving GES under the UK Marine Strategy.

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7 https://assets.publishing.service.gov.uk/media/67614ba094c0d990c1ef3922/Annex-A-list-and-publication-dates-of-FMPs-amended-December-2024.pdf

8 https://pubadmin.institute/public-policy-and-analysis/policies-goals-public-policy-distinction#google_vignette

9 https://www.daera-ni.gov.uk/sites/default/files/2026-02/MPA%20Strategy%20for%20the%20Northern%20Ireland%20Inshore%20Region%202025-2030.pdf

10 https://www.daera-ni.gov.uk/sites/default/files/2025-04/Northern%20Ireland%20Blue%20Carbon%20Action%20Plan%202025%20%E2%80%93%202030.pdf

In particular, NIMTF have noted that there were missing relevant marine conservation strategies such as the MPA Strategy for Northern Ireland's Inshore Region 2025 - 2030[9], the Blue Carbon Action Plan 2025 - 2030[10] and the Elasmobranch Conservation Strategy and Action Plan 2026 - 2035[11]. It is important to note that migratory routes of various species such as seabirds, elasmobranchs and cetaceans are aiming to be assessed through a series of upcoming programmes established through the PeacePlus Programmes and through various academia projects such as ELASMO[12].

To ensure effective action on bycatch, especially for elasmobranchs, recommendations from the 2026 Report "Reducing Elasmobranch Bycatch in Northern Ireland Waters[13]" makes a series of recommendations complete with opportunities and limitations which can be factored into these FMPs. These recommendations include a co-design process which was carried out to ensure that all recommendations were done in collaboration with the fishing sector.

Additionally, for the actions relating to marine developments and their impact on both fishing grounds, but also on environmental habitats and species, NIMTF produced a 2026 Report "Proposed Management Measures for Co-Location of Offshore Renewable Energy Developments in the NI MPA Network - Atlantic Region[14]" which sets high-level recommendations with opportunities and limitations which can be factored in to ensure that any developments which are sustainable have a minimal impact on environmental areas, but by extension also to fishing sectors.

Whilst closures exist within the Isle of Man areas, it can be seen from the figures within the draft plan that summer and autumn spawning times and locations are excluded from being fished. This is typically also linked towards the different types of gear which is used and is of concern within the MPAs themselves given that a Greenpeace Report from 2022 found that data from the Global Fishing Watch[15] found that between January 2020 and January 2025 that supertrawlers were spending nearly 37,000 hours fishing within MPAs, whilst on average there was around 7,380 hours spent within MPAs annually[16]. Meanwhile a Marine Conservation Society report "Marine UnProtected Areas[17]" showed that bottom trawling activity was taking place within 98% of the UK's offshore MPAs between 2015 and 2018, equating to at least 89,894 hours fishing the seabed within these offshore MPAs. Oceana produced a report called "Mission Regeneration: A Roadmap to Ending Overfishing & Restore Life to UK Seas" in 2024[18], which detailed the extent to which fishing activity is taking more than it needs, and highlighted time-bound actions for governments to implement by the end of 2025 to secure the resilience of MPAs, including the banning of bottom trawling activity within MPAs. Further information on this can be found within our response to the Consultation on the Development of Fisheries Management Measures for Marine Protected Areas (MPAs) in the Northern Ireland Offshore Region[19].

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11 https://www.daera-ni.gov.uk/sites/default/files/2026-09/Elasmobranch%20Conservation%20Strategy%20for%20Northern%20Ireland%202026-2035.pdf

12 https://www.qub.ac.uk/research-centres/QueensUniversityMarineLaboratory/research/ELASMO/

13 https://nimtf.org/wp-content/uploads/2026/09/final-report-reducing-elasmobranch-bycatch-in-ni-ab.pdf.pdf

14 https://nimtf.org/wp-content/uploads/2026/09/sl-nimtf-report-co-location-of-ore-in-the-ni-mpa-network_2026.pdf.pdf

15 https://globalfishingwatch.org/

Below NIMTF have indicated where the wording of each action can be strengthened in **bold** where wording can be amended below in Table 2.

Table 2. Current and Amended Wording for Action Points within the Irish Sea Demersal FMP.

Action Number	Current wording	Amendments
1.1	Continue to work, in accordance with the JFS; with other policy authorities of this shared stock with the aim of maintaining sustainable harvesting.	Continue to work, in accordance with the JFS **and UK Marine Strategy**; with other policy authorities of this shared stock with the aim of maintaining **an ecosystem-based approach to adaptive** sustainable harvesting.
1.2	Continue to take an approach to TAC setting and negotiations informed by the best available scientific advice, including mixed fishery considerations and social economic factors, in line with an MSY approach.	Continue to take an **ecosystem-based** approach to TAC setting and negotiations informed by the best available scientific advice, including mixed fishery considerations and social economic factors, in line with an MSY approach.
1.3	Work to address any identified evidence gaps and the use of fisher derived data.	Work to address any identified evidence gaps and the use of fisher derived data **to drive an adaptive, ecosystem-based approach to fisheries management**.
2.1	Continue to minimise and where possible avoid catches of Cod, Whiting and Haddock through the use of proven TCM.	Continue to minimise and avoid **bycatch** of Cod, Whiting and Haddock through the use of proven TCM **in line with the UK Bycatch Mitigation Initiative to achieve GES for 'Fish', 'Marine Mammals', 'Seabirds', 'Food Webs', etc**.
2.2	Continue to support the development of TCM to reduce catches of these stocks, and other unwanted catches, through programmes such as the NI Gear Trials Programme and UK/EU commitments.	Continue to support the development of TCM to reduce catches of these stocks, and other unwanted catches, through programmes such as the NI Gear Trials Programme and UK/EU commitments. Too similar to Action 2.1
2.3	Consider appropriate actions to gather evidence on recreational catch.	**Implement** appropriate actions to gather evidence on recreational catch **to inform adaptive, ecosystem-based approaches to fisheries management**.
2.4	Undertake relevant research to support stock evaluation and develop actions as needed.	Undertake relevant research to support stock evaluation and develop **adaptive** actions as needed **to achieve GES for 'Fish'.**
2.5	Support ongoing evaluation, development	Support ongoing evaluation, development

	and of selective gears to reduce unwanted catches.	and **a suite** of selective gears to reduce unwanted catches **under the UK Bycatch Mitigation Initiative to achieve GES for 'Seabirds', 'Marine Mammals' and 'Fish'.**
2.6	Initially REM may be trialled by DAERA as part of a research project on a small number of vessels.	Initially REM **will** be trialled by DAERA as part of a **bespoke** research project on a small number of vessels **>12m in length**.
2.7 (Haddock only)	Support ICES to address data weaknesses and evidence data gaps - specifically - Restoring and stabilising survey coverage, - Evaluating alternative modelling approaches (including survey-based and data-limited Category 2 and 3 methods), and - Ensuring full documentation and transparency of methods and data inputs	Support ICES **and UK Annual Reporting** to address data weaknesses and evidence data gaps - specifically for: - Restoring and stabilising survey coverage, - Evaluating alternative modelling approaches (including survey-based and data-limited Category 2 and 3 methods), and - Ensuring full documentation and transparency of methods and data inputs
2.8	Take a precautionary approach to TAC setting, following the principles set out in the JFS until sufficient evidence is in place to make a robust assessment.	**Implement** a precautionary approach to TAC setting, following the principles set out in the JFS**, Environmental Principles Policy Statement and the Fisheries, Aquaculture and Water Environment Bill/Act** until sufficient evidence is in place to make a robust assessment **to achieve GES for 'Fish'**.
2.9	Continue to work with the EU with the aim of achieving the sustainable harvesting of the stock through international negotiations.	Continue to work with the EU **and UK** with the **objective to achieve** sustainable**, ecosystem-based, adaptive** harvesting of the stock through international negotiations.
2.10 (Plaice only)	Develop the evidence base on Plaice bycatch and related discards.	**Further** develop the evidence base on Plaice bycatch and related discards **to achieve GES for 'Fish'.**
2.11	Explore what measures can be taken to reduce Plaice discard rates and discard survivorship.	**Identify and implement adaptive** measures **which** can be taken to reduce Plaice discard rates and **increase** discard survivorship.
2.12 (Nephrops only)	Undertake an options appraisal for functional unit (FU) management of Nephrops to support recovery. The appraisal will assess biological, environmental and socio-economic evidence, including impacts on fleet viability, fishing patterns, displacement	Undertake an options appraisal for functional unit (FU) management of Nephrops to support recovery**, covering the following areas:** - **Biological, environmental and socio-economic evidence**

	risk, operating costs, emissions, and coastal communities, as well as the costs, benefits and practical deliverability of different options.	- **Impacts to fleet viability, fishing patterns, displacement risk, operating costs, emissions and coastal communities** - **Costs, benefits and practical deliverability of different options**
2.13	Consider options, where supported by appropriate scientific and socio-economic evidence, around setting limit and MSY reference points for biomass and fishing effort at a stock level (for FUs and areas outside of FUs) and adopt as appropriate and supported by scientific evidence.	**Assess** options, where supported by appropriate scientific and socio-economic evidence, around setting limit and MSY reference points **and ranges** for biomass and fishing effort at a stock level (for FUs and areas outside of FUs) and adopt **adaptive** scientific evidence.
2.14	As part of the options appraisal, explore the potential development of an appropriate Harvest Strategy and supporting management tools that could be available for use at FU level if required, alongside the development of suitable measures which could be adapted to each FU, and which may to support recovery and be available for use in a stock depletion situation or collapse scenario should this occur in the future. In developing these measures, the circumstances under which quota management measures might be applied should be appraised, and consideration given to what those measures should be.	**Assess** the development of an **adaptive**, appropriate Harvest Strategy and supporting **adaptive** management tools that **are** available for use at FU level if required, alongside the development of suitable measures which **will** be adapted to each FU. **This will be used** to support recovery and be available for use in a stock depletion situation**,** or collapse scenario **probability** in the future. In developing these measures, the circumstances under which **adaptive** quota management measures **are** applied should be **appraised and assessed and implemented**.
2.15	Consult as required on any potential options for FU management, engaging stakeholders throughout the appraisal to inform assessment of biological, environmental and socio-economic impacts, and the appropriateness of different management tools, before any decisions on further development or implementation are taken.	Consult**, assess and implement** any potential options for **adaptive** FU management, engaging stakeholders throughout **covering the following areas:** - **Biological, environmental and socio-economic impacts** - **Appropriateness of different management tools**
3.1	Provide evidence and information on fishing activity to underpin other management decisions in the marine environment.	**Ensure adaptive** evidence and information on fishing activity **underpins adaptive management of this FMP to safeguard stocks and marine habitats**.
3.2	Collaborate with industry to identify upcoming concerns and support where possible the addressing of any evidence gaps.	**DAERA to** collaborate with industry to identify upcoming concerns and support through **adaptive evidence gathering to address** gaps.

3.3	Support decision-making that impacts on fishing activity by ensuring open access to the relevant evidence.	Support decision-making that impacts on fishing activity by ensuring open access to **adaptive** relevant evidence.
4.1	Support data collection under the UK Bycatch Mitigation Initiative to improve understanding of risk and frequency of sensitive species interactions; the effectiveness of existing mitigation and avoidance measures; and implement improvements. This includes the addition of seabirds and mammals to observer data collection forms, supporting the Seabird Conservation Strategy and Action Plan.	Support **adaptive** data collection under the UK Bycatch Mitigation Initiative to improve understanding of **adaptive** risks and frequency of**:** - **Sensitive species interactions** - **Effectiveness of existing mitigation and avoidance measures** - **Implement improvements** **To include seabirds, marine mammals and elasmobranchs to observer data collection forms to support the Seabird Conservation Strategy and Action Plan 2026 - 2035 and the Elasmobranch Conservation Strategy 2026 - 2035.**
4.2	Identify and adopt effective incentives for fisheries to implement bycatch and entanglement mitigation measures. Including ongoing support of data collection and trials through the continuation and expansion of existing bycatch programmes (such as the UK BMI - Bycatch Monitoring Programme (BMP) and Clean Catch UK)	Identify and adopt effective incentives for fisheries to implement bycatch and entanglement mitigation measures t**o achieve GES for 'Seabirds', 'Marine Mammals' and 'Fish', supporting the Elasmobranch Conservation Strategy 2026 - 2035 and the Seabird Conservation Strategy and Action Plan 2026 - 2035.** Include ongoing **adaptive** support of data collection and trials through the continuation and **adaptive** expansion of existing bycatch programmes (such as the UK BMI - Bycatch Monitoring Programme (BMP) and Clean Catch UK)
4.3	Collaborate across the UK to progress the UK Marine Strategy Programme of Measures (POM), including addressing marine litter and noise.	Collaborate across the UK to progress the UK Marine Strategy Programme of Measures (POM), including addressing metrics for 'Anthropogenic Noise' and achieve GES for the following indicators: - Seabirds - Marine Mammals - Fish - Benthic Habitats - Commercial Fish
4.4	Continue to apply fishing management measures in MPAs and introduce additional	Continue **applying adaptive fisheries** management measures in MPAs and

	measures as necessary. Evaluate the effect of any additional/potential management measures put in place for MPAs, identifying cumulative impacts on the industry.	introduce additional measures based on **an evidence-based approach.** Evaluate the effect of any additional/potential management measures put in place for MPAs, identifying cumulative impacts on the industry **and for MPAs to build NI-specific case studies**.
4.5	Support and enable the fishing industry to explore alternative gear options to reduce benthic impacts where needed through programmes such as the NI Gear Trials Programme. Continue to improve our understanding of benthic impacts within the Nephrops fishery and in other demersal Irish Sea fisheries.	Support and enable the fishing industry to **adopt** alternative gear options to reduce **targeted** benthic impacts through the NI Gear Trials Programme. Continue to **further develop** our understanding of benthic impacts within the Nephrops fishery and in other Irish Sea fisheries **to ensure an ecosystem-based approach**.
4.6	Work with the international community to share best practice and lessons learned to contribute to the understanding, reduction and elimination of bycatch and entanglement globally.	Work with the international community to share and **develop** best practice and lessons learned to contribute to the understanding, reduction and elimination of bycatch and entanglement globally.
4.7	Consider research into how an ecosystem-based approach to fisheries management could be incorporated into future iterations of the Irish Sea Demersal FMP and where these might align with comparable approaches for other species.	**Fund and deliver targeted** research into how an ecosystem-based approach to fisheries management **will** be incorporated into future iterations of the Irish Sea Demersal FMP and where these might align with comparable approaches for other species **from across the UK devolved nations**.
4.8	In Northern Ireland, review current AFBI reporting mechanisms to ensure robust and comparable data is available for all fishing activity. Continue to liaise with AFBI and other assessors to address any concerns in data collection and delivery of scientific advice.	In Northern Ireland, review current AFBI reporting mechanisms to ensure robust, **adaptive** and comparable data is available for all fishing activity. Continue to **collaborate** with AFBI and other assessors to address any **weaknesses in robust** data collection and delivery of scientific advice.
4.9	In Wales, use Assessing Welsh Fishing Activities (AWFA) assessments to review the potential environmental impacts of current fisheries management practices and FMP linked proposed changes and consider mitigation.	In Wales, use Assessing Welsh Fishing Activities (AWFA) assessments to review the potential environmental impacts of current fisheries management practices and FMP linked proposed changes and **implement** mitigation.
5.1	Explore funding opportunities to encourage industry-led development of strategies aimed at maximising the efficiency of fishing vessels while maintaining sustainable practices. This may	**Assess** funding opportunities to **ensure** industry-led development of strategies aimed at maximising the efficiency of fishing vessels while maintaining **adaptive** sustainable practices**, such as:**

	include investigating the potential for automation, assessing circular economy benefits such as total catch valorisation and utilisation of by-products, and implementing diversification measures into additional fisheries. Additionally, consider support for gear modifications (including derogations) and guidance toward marketing resources.	- **Investigating the potential for automation** - **Assess circular economy benefits (e.g. Total catch valorisation, utilisation of by-products, implement diversification measures to additional fisheries** - **Support gear modifications (including derogations)** - **Develop guidance towards marketing resources**
5.2	Encourage industry-led funding initiatives that enhance the appeal of seafood sector jobs and help ensure a domestic workforce. This may include measures to support new entrants, improve working conditions (such as safety, wages, and crew welfare), boost catch returns, and promote fish products as high-quality, low-carbon food sources.	**Co-design and deliver with** industry funding initiatives that enhance the appeal of seafood sector jobs and help ensure a domestic workforce. This may include measures to support new entrants, improve working conditions (such as safety, wages, and crew welfare), boost catch returns, and promote fish products as high-quality, low-carbon food sources.
6.1	Consider how to undertake additional targeted evidence collection relevant to the Irish Sea and current fishing activity. This could include impact on carbon sequestering within Nephrops fishing grounds as well as evidence marine interactions. We will evaluate potential options, such as continuation of the OSPAR data for ICES, and continue to request relevant advice and explore options to address data gaps.	**Undertake** additional targeted evidence collection relevant to the Irish Sea and current **and adaptive** fishing activity. This **will** include**, but not be limited to:** - **Impact on carbon sequestering within Nephrops fishing grounds** - **Evidence around impacts to marine interactions** - **Potential options for continued data series (e.g. OSPAR data for ICES, UK Annual Reporting)** - **Request relevant advice and assess options to address data gaps**
6.2	Explore actions to support industry in any adaptation to climate change through research and innovation, including the mitigation of fishing vessel emissions.	**Assess** actions to support industry **to adapt to the impacts of** climate change through research and innovation, including the mitigation of fishing vessel emissions **to achieve objectives under the Climate Change Act, carbon emissions reductions and climate action plans**.
6.3	Evaluate and consider supporting the roll-out of new technologies and practices to decarbonise the fleet and build resilience, in line with the carbon budgets established under the Climate Change Act	Evaluate and **implement support for** the roll-out of new technologies and practices to decarbonise the fleet and **incorporate long-term** resilience, in line with the carbon budgets established under the Climate

	2008.	Change Act **2022**.

Pelagic FMP

4. Do you have any comments on the goals in the draft pelagic FMP?

As previously highlighted under Question 2, NIMTF have great concerns with the specific wording for all of the policies contained within the Irish Sea Pelagic FMP. The inclusion of the word 'Goal' has a significant impact on the overall impact and intention of what this draft FMP will achieve. The precise definitions are outlined below:

Goal - "A goal is a desired end-state - an outcome a society aspires to. It is broad, visionary and often value-laden. Ensuring universal literacy, eradicating poverty or reducing maternal mortality are all examples of goals. They give direction and purpose to governmental action."

Policy - "A policy, in contrast, is the deliberate course of action chosen to achieve such a goal. As one textbook framings puts it, a policy is essentially a preferred outcome that a society seeks to fulfil when viewed from the goal side, while the policy itself is the route selected to reach it. Policies may take the form of laws, programmes, regulations, subsidies, or administrative guidelines."

Given the above descriptions, we have concerns that the policies outlined within this FMP merely give **direction** rather than outline a **route** to achieve the outcome. Whilst we respect that not every aspect of an FMP can be prescriptive, there are strict components and a purpose to the creation and development of an FMP.

Below NIMTF have indicated where the wording of each action can be strengthened in **bold** where wording can be amended below in Table 3.

Table 3. Current and Amended Wording for Policies within the Irish Sea Pelagic FMP.

Policy Goal	Current wording	Amendments
1	Harvest Irish Sea Herring sustainably with biomass restored and maintained above the level capable of producing MSY	Remove 'Goal' Harvest Irish Sea Herring sustainably with biomass restored and maintained above levels capable of producing MSY **and support achieving GES for 'Fish'.**
2	Use the best available scientific evidence to support management decisions relating to the setting of sustainable	Remove 'Goal' Use **an ecosystem-based approach alongside**

	fishing opportunities.	the best available scientific evidence to support **adaptive** management decisions relating to the setting of sustainable fishing opportunities **and achieve GES for 'Fish'**.
3	Deliver wider sustainable management by taking steps to minimise the impact of Irish Sea herring fisheries on the marine ecosystem.	Remove 'Goal' Deliver wider **ecosystem-based,** sustainable **adaptive** management by minimising the impact of Irish Sea Herring fisheries on the marine ecosystem **and achieve GES for 'Fish', 'Marine Mammals', 'Seabirds', 'Food Webs'**.
4	Support the fishing industry to deliver socio-economic and cultural benefits for rural and coastal communities.	Remove 'Goal' Support the fishing industry to **assess and** deliver socio-economic and cultural benefits for rural and coastal communities.
5	Minimise the impact of fish activities on climate change and support the fishing industry to adapt to climate change	Remove 'Goal'. Minimise the impact of **fisheries-related** activities on **achieving the objectives of the Climate Change (Northern Ireland) Act, Climate Action Plans** and support the fishing industry to adapt to **changes and environmental impacts** to climate change.

5. Do you have any comments on the possible actions identified under the respective goals?

NIMTF have concerns regarding the wording of some of the actions - the use of "may", or "consider" in the majority of actions weakens the strength and robustness of the actions, which inherently weakens achievement of the policy 'goal'. Given that NIMTF have previously outlined that policy 'goals' drive direction rather than a route to achieving, NIMTF have concerns that by maintaining these weakening words, it undermines the entire point of developing an FMP.

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16 https://oceanographicmagazine.com/news/supertrawlers-fish-for-7380-hours-annually-in-uk-mpas/
17 https://www.mcsuk.org/what-we-do/marine-management/marine-protected-areas-mpas/marine-unprotected-areas/
18 https://uk.oceana.org/wp-content/uploads/sites/14/2024/11/Oceana-UK_Mission-Regeneration_Roadmap-to-End-Overfishing.pdf
19 https://nimtf.org/wp-content/uploads/2026/08/nimtf-response-offshore-mpas-fisheries-management-response-2026.pdf
20 https://www.qub.ac.uk/News/Allnews/2026/Queenslaunchesnewprojectstouncovertheimpactofclimatechangeonmarine.html
21 https://www.economy-ni.gov.uk/articles/offshore-renewable-energy-action-plan-oreap
22 https://www.daera-ni.gov.uk/consultations/carlingford-lough-spa-renotification
23 https://www.legislation.gov.uk/nisr/2024/215/made

It is concerning the Pelagic FMP, which states on Page 4 that MSY is to be restored, but this should be set **above** MSY to ensure that wild populations are able to be sustained through an "ecosystem-based approach to fisheries management". The Technical Conservation Measures (TCMs) highlight that the Mesh Size for the Mourne Box Closure shows that there are the following in place:

- Mesh size is 54mm minimum
- Does not apply to historical, small-scale fishing vessels (<12.2m using driftnets)
- Limit of 50 tonnes annually across all vessels within
- Minimum Conservation Reference (MCR) Size is 20cm

These lessons should be applied to greater than just the Mourne Box Closure to further develop TCMs for both FMPs. There is further information under Question 5 around the actions.Given that climate change is causing the spawning of herring to occur later in the year, with potential additional spawning opportunities earlier in the year now also happening. PEACE PLUS Projects such as MOSAIC and ACCLIMATISE[20] will help to provide a greater understanding of interactions with food webs, migratory routes and how these will impact on foraging opportunities for wild populations such as seabirds and marine mammals.

Given that Page 11 of the FMP states that "Increasing anthropogenic activity and the potential impact on the Irish Sea spawning stock is a cause for concern", NIMTF are surprised that there is not the same extent of actions relating to marine developments - given that to meet the objectives of the Climate Change Act 2022, there is a requirement to meet current and future energy expectations through the development of the Offshore Renewable Energy Action Plan[21]. Whether it is recommended or refined resource zones have yet to be finalised with the Department for Economy but there are areas within the Irish Sea which overlap with resource zones, or run adjacent depending on which route the Department opts. This has particular issue for areas such as the Mourne Box Closure, which overlaps with the proposed Carlingford SPA[22] which has yet to have it's status changed from proposed to finalised.

The following gear types have been identified:

- Pots
- Gillnets-drift
- Bottom Otter Trawl (Single)
- Midwater Otter Trawls
- Bottom Pair Trawls
- Midwater Pair Trawls

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24 https://www.daera-ni.gov.uk/articles/northern-irelands-draft-climate-action-plan-2023-2027

25 https://sharkrayareas.org/

Climate Change

Whilst the UK has committed to a reduction of 78% by 2035, Northern Ireland has committed to reduction emissions targets by the fishing sector and others through the Carbon Budgets[23] and Climate Action Plans[24].

Whilst it has been acknowledged that it is difficult to predict impacts for Herring as a result of climate change, ICES currently paints a grim picture and it has been stated on Page 32 that "Expected habitat suitability for species like herring will change, resulting in less favourable conditions for the species to live in UK waters in the longer term."

Anthropogenic Noise and Bycatch

It should be noted that pelagic fishing in particular uses echo sonar, which should be considered strongly with the potential impacts to marine mammals. Whilst echo sonar does not impact elasmobranchs, or sharks, skates and rays, it is understood that the Irish Sea area near to where the Herring are caught crosses over with Important Shark and Ray Areas (ISRAs)[25]. This is critical as we consider the impact that this FMP will have on Spurdog and other forage fish such as Sprat and Mackerel which will continue to influence the metrics and indicators within the UK Marine Strategy.

It has been identified that there is **moderate risk** from the Irish Sea Pelagic Fishery (pelagic trawls, drift nets and gillnets) to various marine priority features within the Species category (specifically for mobile species, marine mammals, seabirds and fish), primarily through direct bycatch and implications to forage food removal pathways. This further extends to low, or limited mobility species which are at **low risk** of bycatch and reduction of prey availability, but there is still a risk when combined with cumulative pressures. As a result, actions which relate to marine conservation strategies should also be adopted where there is cross-over with the actions such as the Seabird Conservation Strategy and Action Plan 2026 - 2035 and the Elasmobranch Conservation Strategy 2026 - 2035; through the use of REM, I-VMS and eliminator devices within gear sets should all be utilised within the actions.

NIMTF respects that whilst there is a minimal to low proportion of the NI fleet which utilises driftnets and gillnets, this FMP specifically is targeting fishing vessels **operating in the Irish Sea** and should still be considered - regardless of if there is a **low risk** to features within the Mourne Closure Box operating over a small scale. Forage fish will become all the more important with the overlap in the pSPA.

There is potential that a range of indicators for MSY alongside GES indicators are included rather than just B_{lim} and B_{trig}. This would allow a greater assessment that stocks can be managed sustainably based on accurate information and enable action to be pre-planned as opposed to reaching a threshold point, deciding on action whilst the stocks decline further.

Whilst NIMTF appreciates that ICES data does not provide provision of the inclusion of predator-prey species interactions within the adaptive management approach, this FMP should factor this in given that Herring has been identified as a keystone species.

It is expected that powers for DAERA Sea Fisheries Inspectorate will increase/improve under the updated Fisheries, Aquaculture and Water Environment Bill[26] when it is finalised, which updates the Fisheries Act (Northern Ireland) 1966[27].

Below NIMTF have indicated where the wording of each action can be strengthened in **bold** where wording can be amended below in Table 4.

Table 4. Current and Amended Wording for Action Points within the Irish Sea Pelagic FMP.

Action Number	Current wording	Amendments
1.1	Continue to take an approach to TAC setting that is sustainable, informed by the best available scientific advice, and in line with an MSY approach.	Continue to take an **ecosystem-based** approach to TAC setting that is sustainable, informed by the best available scientific advice, and **builds on the MSY approach to support achieving GES for 'Fish'.**
1.2	Continue to work with EU partners through international negotiations with the aim of maintaining the sustainable harvesting of the stock and appropriate access.	Continue to work with EU partners through international negotiations with the aim of maintaining **and improving the** sustainable harvesting of stock and appropriate access **to achieve GES for 'Fish'**.
1.3	Consider implementing fisheries management measures, including spawning ground closures, and development of appropriate gear technology.	**Implement adaptive** fisheries management measures, including spawning ground closures, **REM, VMS** and development of appropriate **sustainable** gear technology **to reduce bycatch levels and achieve GES for multiple indicators**.
2.1	Ensure the best scientific advice is available for management decisions by contributing to and participating in the international stock assessment process, notably through the provision of high-quality data.	Ensure the best scientific advice is available for **adaptive** management decisions by contributing to and participating in the international stock assessment process, notably through the provision of high-quality data.
2.2	Seek a benchmarking process for the Irish Sea herring assessment as a UK priority.	**Implement** a benchmarking process for the Irish Sea Herring Assessment as a UK priority.
2.3	Improve the evidence base for herring stocks including supporting work to determine if and how exploitation of fish stocks outside of the FMP area is affecting the Irish Sea herring stock within the FMP area and vice versa.	Improve the evidence base for Herring stocks including supporting work to determine **the methods of** exploitation of fish stocks outside of the FMP area and **how this** is affecting the Irish Sea Herring stock within the FMP area and vice versa **and achieve GES for 'Fish'**.

2.4	Consider evaluating current data gathering protocols to identify means of improving data provision, consistency, and identifying any critical data and knowledge gaps. Explore further options for assessing stock(s) or exploitation status.	**Evaluate** current data gathering protocols to identify **adaptive** data provision, consistency, and identifying critical data and knowledge gaps. Explore further options for assessing stock(s) and/or exploitation status **such as metrics of indicators to achieve GES for multiple indicators**.
2.5	Build partnerships between stakeholders and UK Research and Innovation (UKRI) institutes to ensure that: - Research is targeted at answering management questions, - Research is peer reviewed, - Industry is engaged with and consulted, - Data is made available to support evidence-based fishery management, and - Both fishery-dependent and independent data are fully utilised.	Build partnerships between stakeholders and UK Research and Innovation (UKRI) institutes **that ensures delivery for**: - Research is targeted at answering **adaptive** management questions, - Research is peer reviewed, - Industry is engaged with and consulted, - Data is made available to support an evidence-based, **ecosystem-based, adaptive approach to** fishery management and, - Both fishery-dependent and independent data are fully utilised **and incorporated into adaptive management**.
2.6	Regularly engage with representative groups (including NIFPO and ANIFPO) on how best to utilise scientific evidence published by ICES. Consult directly with fishermen on firsthand data to improve stock assessment and fisheries management accuracy.	Regularly engage with representative groups (including NIFPO and ANIFPO) on how best to utilise scientific evidence published by ICES **and UK Government**. Consult directly with fishermen on firsthand data to improve stock assessment and **adaptive** fisheries management accuracy **and achieve GES for 'Fish'**.
3.1	Fisheries policy authorities will allocate additional quota in line with the requirements of the Act, paying due regard to the need to incentivise low impact fishing.	Fisheries policy authorities will allocate additional quota**, where sustainably appropriate**, in line with the requirements of the **Fisheries, Aquaculture and Water Environment Act**, **incentivising** low impact fishing.
3.2	Continue to implement fisheries management measures for existing MPAs and consider the need for any new actions. Measures should complement the conservation objectives.	Continue to implement **adaptive** fisheries management measures for existing **and future** MPAs and **incorporate** the need for **adaptive** actions. Measures should complement the **MPA** conservation objectives **and those contained within the following relevant conservation strategies to achieve GES for 'Fish', 'Seabirds', 'Benthic Disturbance', 'Food Webs', 'Marine Mammals', etc:** - **Elasmobranch Conservation Strategy**

		2026 - 2035 - **Seabird Conservation Strategy and Action Plan 2026 - 2035** - **MPA Strategy for Northern Ireland's Inshore Region 2025 - 2030** - **Blue Carbon Action Plan 2025 - 2030**
3.3	Continue to work with industry and other stakeholders on a range of management initiatives such as: - Protecting spawning and nursery areas of the stocks, - Monitoring and review of the Irish Sea herring fishery to improve environmental and economic sustainability, and - Rollout of REM to key parts of the UK fishing fleet to improve data and monitoring of catch and interactions with sensitive marine species.	Continue to work with **all relevant** stakeholders **to develop** a range of **adaptive** management **issues to achieve GES for a range of indicators and metrics** such as: - Protecting spawning and nursery areas of the stocks, - Monitoring and review of the Irish Sea Herring Fishery to improve environmental and **socio-economic** sustainability, and - Rollout of REM to **all** parts of the UK fishing fleet to improve data, monitoring and catch interactions with sensitive marine species.
3.4	Support data collection under the UK Bycatch Mitigation Initiative to improve understanding of risk and frequency of sensitive species interactions; the effectiveness of existing mitigation and avoidance measures; and implement improvements. This includes the addition of seabirds and mammals to observer data collection forms, supporting the Seabird Conservation Strategy and Action Plan.	Support **and enhance** data collection under the UK Bycatch Mitigation Initiative to improve understanding of risk and frequency of sensitive species interactions; **assess** the effectiveness of existing and **adaptive** mitigation and avoidance measures; and implement improvements. This includes the **inclusion of additional** seabirds, marine mammals and **elasmobranch** observer data collection forms, supporting the Seabird Conservation Strategy and Action Plan **2026 - 2035 and the Elasmobranch Conservation Strategy 2026 - 2035 to support achieving GES for 'Fish', 'Seabirds' and 'Marine Mammals'**.
3.5	Explore avenues to protect and enable recovery of habitats identified as important to herring from the pressures that pose risks to them, including certain fishing practices and other marine activities.	Explore **and pursue** avenues to protect and enable **the** recovery of habitats identified as important to Herring from **identified** pressures that pose risks, including certain fishing practices**,** marine **developments** and other marine activities.
3.6	Continue to support where possible research to deliver an increased understanding of benthic disturbance and impacts. For example, seafloor litter, surface litter and beach litter.	Continue to support research to deliver increased **knowledge and capacity** of benthic disturbance and impacts **to meet GES for relevant indicators of the UK Marine Strategy**. For example **Marine Litter, Benthic Disturbance and Food Webs.**
3.7	Support and encourage existing good	Support **best** practice within the fishing industry

	practice within the fishing industry in relation to the handling of sensitive and/or vulnerable marine species and the returning of them to the sea unharmed.	**with regards** to the handling of sensitive and/or vulnerable marine species and improved methods of returning them to the sea unharmed **to contribute to the Bycatch Mitigation Initiative**.
3.8	Support ongoing research initiatives to support the reuse and repurpose of end-of-life fishing gear back into the fishing industry.	Support ongoing research initiatives to support the reuse and repurpose of end-of-life fishing gear back into the fishing industry **to meet GES for Marine Litter indicator**.
3.9	Fisheries policy authorities should continue to engage with the Isle of Man Department of Environment, Food and Agriculture (DEFA) on important spawning grounds within Isle of Man territorial waters to ensure continued protection.	Fisheries policy authorities **must** continue to engage with Isle of Man Department of Environment, Food and Agriculture (DEFA) on important spawning grounds within Isle of Man territorial waters to ensure continued protection.
4.1	Continue to take account of socio-economic factors as part of the international negotiations and setting of fishing opportunities.	Continue to take account of socio-economic factors as part of the international negotiations and **adaptive** setting of fishing opportunities.
4.2	Continue to gather evidence on economic aspects of the fishery to ensure management decisions are informed by the best available evidence.	Continue to gather evidence on economic aspects of the fishery to ensure **adaptive** management decisions **inform** the **ecosystem-based approach** use of best available evidence.
4.3	Encourage and support where possible innovation and growth of the sector.	Support innovation and growth of the fishing sector through an **ecosystem-based approach and meet GES under the UK Marine Strategy**.
4.4	Incentivise sustainable practices through the allocation of additional quota where evidence supports a sustainable application.	Incentivise **an ecosystem-based approach to** sustainable practices through the allocation of additional quota, **where sustainably appropriate**. This is similar to Action 3.1
4.5	Monitor and assess the Irish Sea herring fisheries to better understand the social and economic value provided to the coastal communities within the FMP area where appropriate	No change This is similar to Action 2.1
4.6	Consider other opportunities where possible that support pelagic fisheries in response to external pressures and other marine uses.	**Implement** other **methodologies and** opportunities, where feasible that support pelagic fisheries in response to external **environmental** pressures, **marine developments** and other marine users.

5.1	Ensure that Irish Sea herring is considered as appropriate within wider iterative research to examine the likely impacts of climate change on herring fisheries, spawning areas, food sources and their connective links within the wider ecosystem.	Ensure that Irish Sea Herring is **appropriately accounted for** within wider, **adaptive** research **which examines** the likely impacts of climate change on Herring fisheries, spawning areas, food sources and their connective links within the wider ecosystem.
5.2	Collaboration across government, industry, and academic sectors on initiatives to reduce the environmental impact of Irish Sea herring fisheries, including reducing CO2 emissions, greater fuel efficiency and alternative vessel fuels.	**Continue implementing** collaboration across Government, industry, and academic sectors on **co-design and co-delivery of** initiatives to reduce the environmental impact of **and from** Irish Sea Herring fisheries **by** reducing CO2 emissions, **assessing** greater fuel efficiency and **assessing** alternative vessel fuels.
5.3	Continue to gather and develop evidence of the impacts that Irish Sea herring fisheries have on the marine environment (including CO2 emissions) through collaborative studies.	Continue to gather and develop **adaptive** evidence of the impacts that Irish Sea Herring fisheries (including CO2 emissions **and alternative vessel fuels**) through collaborative studies **across academia, environmental and fishing sectors**.
5.4	Evaluate the most appropriate mechanism for integrating information on the effects of climate change on FMP stocks and fisheries into fisheries management, including stock assessments and advice on fishing opportunities.	Evaluate the most appropriate **adaptive mechanisms** for integrating information on the effects of climate change on FMP stocks and fisheries into **adaptive** fisheries management, including stock assessments and advice on fishing opportunities.
5.5	Build on the work carried out by WKIrish on the impacts of climate change on zooplankton and the large zooplankton index, which was identified as a key driver in supporting herring stocks.	Build on the work carried out by WKIrish on the impacts of climate change on zooplankton and the large zooplankton index, which was identified as a key driver in supporting Herring stocks **and contributes to achieving GES for Food Webs under the UK Marine Strategy**.
5.6	Evaluate and support the roll-out of new technologies and practices to decarbonise the fleet and build resilience, in line with the carbon budgets established under the Climate Change Act.	Evaluate and support the roll-out of new technologies and practices to decarbonise the fleet and build **environmental and fleet** resilience, in line with the **Climate Action Plans and** Carbon Budgets established under the Climate Change Act.

26 https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/agriculture-environment-and-rural-affairs/legislation/bills-primary-legislation/fisheries-aquaculture--water-environment-bill/

6. Do you have any comments on the attached initial RIA?

N/A

7. Do you have any comments on the assessment of environmental effects set out in the environmental report for the Irish Sea Demersal FMP?

NIMTF welcomes the extent to which the environmental assessment has been carried out, however we would highlight the particular notable impacts:

Impact to MPAs:

- **Low** risk of Impacts to species and features of MPAs for bycatch from demersal trawls and seines, but also lack of available evidence. Highlights that bycatch impacts could be much higher if populations increase regarding bycatch; increasing to the potential for **moderate**.
- **Low** risk of bycatch within pots/traps based on expert knowledge of operational conditions
- **High** risk for static nets, drift nets and longlines have been identified as being the "greatest" threat facing birds and mobile species, including harbour porpoise.
- **Moderate** risk for the availability of juvenile gadoids and other prey species availability for marine predators designated.

Impact to UK Marine Strategy Descriptors:

- **Moderate** risk to achieving GES for biological biodiversity for seals, bycatch not as significant as other areas, but significant gaps exist.
- **High** risk to achieving for cetaceans and birds as a result of static net and longline fisheries respectively.
- **High** risk to seafloor integrity relating to disturbance from mobile demersal gear. Information does not include impacts from static gears which would lower the rating, but could still be high if operating at a higher intensity.
- **Moderate** risks of impacts from marine litter, an indicator which is intended to achieve GES

NIMTF would like to note that on page 88 of the SEA document, it states that there are only "11 indicators" whereas there are 15 indicators. 11 indicators were under the Marine Strategy Framework Directive back when the UK was part of the EU. It is important that information which is provided is updated and as accurate as possible to ensure the correct transfer of information.

Risk to Priority Species:

- **Moderate** risk for bycatch in demersal trawls for marine mammals, seabirds, fish and elasmobranchs
- **Moderate** risk for elasmobranch and marine mammals caught in pots/traps
- **High** risk for seabirds and marine mammals from bycatch in longlines, static and drift nets with an **additional** risk to fish/elasmobranchs
- **High** risk to mobile species bycatch in static and drift nets, alongside hooks and lines.

- **Moderate** risk for prey depletion to Priority Features
- **High** risk of physical impacts from demersal trawls and seines, whilst **lower** for pots/traps, however linked to intensity within the area, but without further information currently considered **Moderate**.
- **Gaps** for entanglement, bycatch and impact on the seabed.

Impacts to MPA features and habitats goes directly against the integrity and achieving the objectives of the MPA Network and runs the risk of undermining statutory objectives. Where fishing pressure has been identified, there is a statutory obligation to bring in relevant management measures and actions to reduce the identified, targeted pressure within that site and it's impact upon features, which as outlined above all receive **Moderate - High** risk levels. Likewise, there is a statutory obligation to achieve GES under the UK Marine Strategy and given the identified risks at an elevated level, further action must be implemented to ensure an **ecosystem-based approach** to fisheries management.

The requirement for greater information and evidence to make guaranteed decisions, however given the focus of FMPs is to ensure **adaptive**, **ecosystem-based** fisheries management, where there is an element of risk, the precautionary principle should be being invoked and precautionary measures implemented and assessed to gather this information to make further informed decisions and assess whether management options should continue or be adapted.

8. Do you have any comments on the assessment of environmental effects set out in the environmental report for the Irish Sea Pelagic FMP?

NIMTF welcomes the extent to which the environmental assessment has been carried out for the Irish Sea Pelagic FMP. We take note the following components:

- **Moderate** risk of bycatch of mobile species that are designated features AND
- **Moderate** risk to designated species of MPAs from reductions in their prey items (Herring)
    - There is a **Medium** risk inside the Northern Cardigan Bay and Liverpool Bay SPAs for the common scoter and red-throated diver features from visual and above water noise disturbance from fishing vessels.
    • There is a **Medium** risk inside and outside MPAs from diving seabird bycatch.
    • There is a **High** risk inside and outside MPAs from salmon bycatch.
    • There is a **Medium** risk inside and outside MPAs from shad and lamprey bycatch.
    • There is a **Medium** risk inside and outside of MPAs from the targeted removal of herring, part of the fish community assemblage of the Severn Estuary estuaries habitat feature.
    • There is a **High** risk inside and outside of MPAs from the targeted removal of herring affecting harbour porpoise prey availability.

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27 https://www.legislation.gov.uk/apni/1966/17

28 https://www.daera-ni.gov.uk/sites/default/files/2026-06/Northern%20Ireland%20Seabird%20Conservation%20Strategy%202026-2035.PDF

Given that the majority of risk levels highlighted above are **Moderate, Medium or High** shows that the actions contained within this FMP must go further to provide an ecosystem-based approach to adaptive fisheries management.

On page 30, it states that "Further consideration on the impact of prey species is suggested" for NI waters - meaning that there has been less of a focus on ensuring this is factored in. Given the links to the Seabird Conservation Strategy and Action Plan 2026 - 2035[28], the Elasmobranch Conservation Strategy 2026 - 2035, the Blue Carbon Action Plan 2025 - 2030 and the MPA Strategy for Northern Ireland's Inshore Region 2025 - 2030, there should be a greater focus and resulting action within this FMP.

There must be a balance between a thriving, sustainable fishing sector and meeting the objectives of the Marine Act (Northern Ireland) 2013 and the Marine and Coastal Access Act 2009[29] to ensure we are not undermining the objectives set out for our UK MPA Network. We have core examples of how fishing activity is regulated effectively around MPAs that the biodiversity can triple - in the case of Arran Isle.

On the same page, it also highlights "There is a moderate risk to marine litter. More robust estimates are required." As has been highlighted throughout this response, alignment outside of MSY to the achieving GES for the UK Marine Strategy. Marine Litter is one of 13 indicators which is failing to meet GES.

Whilst NIMTF acknowledges the screening out of pelagic trawls pose a low risk from drift and set gill nets due to the lack of use by the NI fishing sector, these are shared water FMPs which apply regulation to **all vessels** operating within the area. There are other fleets which do utilise drift and set gillnets and whilst this may not apply to the NI Fleet, it will apply to others and thus NIMTF would request that these are screened back in to account for other fleet gear usage. This will also influence the current proposed **low** risk to low/limited mobility species of bycatch and reduction in prey availability; alongside the **moderate** risk to priority features within the species list through bycatch and forage food removal. Further work will be needed to ensure that strengthened and implemented actions reduce this risk for this FMP to deliver sustainable fisheries that deliver an ecosystem-based approach.

NIMTF thanks DAERA for the opportunity to respond to both the Irish Sea Pelagic and Demersal FMPs to ensure there is a collective objective to achieve an ecosystem-based approach to fisheries management to not only protect the natural environment but also ensure a thriving, sustainable fishing sector.

For further information, please contact the NIMTF Officer, Robert Walsh on robert.walsh@nimtf.org.

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29 https://www.legislation.gov.uk/ukpga/2009/23/contents