

Response ID ANON-5S7Y-7X8W-P

Submitted to Consultation on draft Irish Sea Demersal Fisheries Management Plan
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About Yourself

1 Your name

Name:

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2 Organisation Name

Organisation name:

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6 Area of interest in which you are responding to consultation

Commercial sea fisheries - catching sector

Comments:

Fisheries regulator for the inshore waters of North West England (<6nm)

7 Other area of interest (not listed at 6)

Comments:

Consultation Questions

8 Do you have any comments on the following sections of the draft demersal FMP? (Background, Stock assessment, MSY and assessment evidence, Fisheries Management, Environmental Considerations, Implementation and Monitoring and Stakeholder engagement)

Yes

Comments:

North Western IFCA is not referenced as a relevant fisheries policy authority anywhere in the FMP. We should be explicitly identified as a delivery partner for the plan for relevant inshore evidence, regulation, conservation and enforcement work. More widely, the English part of the Irish Sea seems to have been completely disregarded, with focus on Northern Ireland and Wales only, betraying a lack of engagement from the lead parties with NWIFCA and the MMO in the development of this FMP to-date.

The FMP should incorporate latest ICES advice and distinguish between stock abundance, fishing pressure and assessment uncertainty. These distinctions are important. Low biomass does not necessarily mean fishing pressure exceeds MSY. Conversely, higher biomasses do not guarantee that current fishing pressures are sustainable.

Fisheries Management

(p.39) The MCRS list omits haddock.

(p.42) Additional control requirements within Northern Ireland and Wales, but what about England (and, incidentally, Isle of Man)? The MMO's and NWIFCA's roles are not even considered.

NWIFCA requests a NWIFCA- and MMO-checked English section covering:

- NWIFCA's management, conservation, scientific and enforcement functions
- Relevant MCRS, habitat, vessel and gear controls, including their geographical scope.
- The relationship with NWIFCA's netting and mobile net byelaw development work.

- The division of responsibilities between NWIFCA, MMO and Defra.
- Coordination with neighbouring administrations and management beyond six nautical miles.

9 Do you have any comments on the goals in the draft Demersal FMP?

Yes

Comments:

For Policy Goals 1 and 2, NWIFCA requests an annually updated comparison of scientific advice, agreed TACs, estimated removals and projected stock development. Where management departs from advice, the plan should explain the expected recovery consequences and safeguards.

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

Yes

Comments:

NWIFCA supports the gear development work identified through actions 2.1-2.6, but the FMP needs to set out a clearer route from trials to operational use:

- Publish evidence of selectivity, target-catch retention and operational costs.
- Identify the fisheries for which each measure is suitable.
- Set adoption milestones and explain how effectiveness will be verified.
- Establish a practical process for recognising proven alternative gears across jurisdictions.
- Review outcomes against stock recovery and mortality targets.

Action 2.11 – This should say 'Explore what measures can be taken to reduce plaice discard rates and INCREASE discard survivorship'. 'Survivorship' should be 'survivability'.

NWIFCA welcomes the proposals under actions 2.12-2.15, but further detail is required on a defined timetable and interim safeguards. ICES explicitly warns that transferring fishing opportunities from other functional units into FU14 (eastern Irish Sea) risks overexploitation of Nephrops here. We request:

- Reliable reporting of NEP catches and effort by functional unit.
- Agreed biological and fishery indicators triggering management action.
- Assessment of possible displacement from western to eastern grounds.
- Interim arrangements capable of preventing excessive catches in FU14 whilst 2.12-2.15 proceed.
- Coordination across administrations and fleets exploiting each NEP stock.

Under Action 4.4, NWIFCA should be consulted with for any MPAs occurring within our district, and the FMP should evaluate ecological effectiveness of measures, not just industry impacts.

11 Do you have any comments on the attached initial RIA?

No

Comments:

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

No

Comments:

How to respond