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

1 Your 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 North West England's inshore (<6nm) waters.

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 pelagic FMP? (Background, Stock assessment, MSY and assessment evidence, Fisheries Management, Environmental Considerations, Implementation and Monitoring and Stakeholder engagement)

Yes

Comments:

- Sections are not clearly marked / headlined, so it is not clear when one is moving from one section to the next.
- The Contents page numbers do not align with where sections start and end.
- There are two sections entitled Policy Goals, at the beginning and again near the end.
- 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.

Background

- Fig 1 and Fig 2 don't reflect the management area of the FMP, which is earlier stated as being VIIa north of 52°30'N.
- The lats and lons on Fig 3 are incorrect, as again is the denoted FMP area.
- Fig 4 again denotes the incorrect FMP area.

Fisheries Management

- (p.26) Reference to North Western IFCA Byelaw 8 is entirely incorrect. It is not a NWIFCA byelaw; it is North Western Sea Fisheries Committee Byelaw 8 (and so does not apply across the entire NWIFCA district), and it prohibits a person from using a net of GREATER THAN 65mm (not less than) when targeting herring with non-trawl nets.
- Overall, NWIFCA requests a replacement of this England paragraph with a NWIFCA-checked account covering:

- the correct byelaw name and details, including mesh restriction, geographical extent and operational scope
- relevant national technical measures
- NWIFCA Byelaw 1, which includes a 200mm herring MCRS, with applicable scope and exemptions
- relevant netting restrictions and any confirmed regulatory changes before publication (NWIFCA is currently awaiting confirmation of a new Netting Byelaw, which will create new fixed netting restrictions and revoke the aforementioned NWSFC Byelaw 8).

Stock Assessment and MSY

- The following evidence should be prominent in the final version:
 - o 2026 catch advice v. agree TAC – ICES advised a maximum TAC of 2,935 tonnes, but a TAC of 4,178 tonnes was agreed (approx. 42% above that advice). This compares the agreed ceiling with advice, rather than actual catches.
 - o 2027 ICES advice is a TAC of 3,716 tonnes
 - o Assessment benchmark – the 2026 ICES advice schedules the benchmark for 2028, whereas the draft FMP anticipates 2027
- The FMP should reflect up-to-date ICES advice.

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

Yes

Comments:

- Policy goals are limited in detail and do not set out a clear process for achievement.
- Actions 1.1-1.3 and 2.1-2.4 should set:
 - o An explicit recovery trajectory, supported by projections and stated biological reference points.
 - o A clear explanation of how future negotiating positions will support that trajectory.
 - o Publish justification and risk assessment wherever agreed fishing opportunities exceed scientific advice.
 - o Interim safeguards pending the benchmark, with annual review and defined triggers for stronger action.
- The inherent assessment uncertainty should strengthen the case for precaution. It should not leave recovery dependent on an assessment exercise being carried out in several years' time.
- Under actions 2.3-2.5, NWIFCA requests a proportionate assessment of:
 - o Herring taken incidentally in other fisheries.
 - o Juvenile herring potentially present in mixed small fish filter net catches (e.g. for 'whitebait').
 - o Relevant bait, recreational and shore-based removals.
 - o The completeness of existing catch records.
- Policy Goal 3 fails to develop on the importance of herring as a prey species, as briefly touched up in the previous section (Environmental Considerations). It should include specific actions to:
 - o Identify the protected predator species and other species materially dependent on herring in the Irish Sea.
 - o Assess seasonal and spatial prey availability, including around relevant MPAs.
 - o Examine whether concentrated fishing could create local depletion despite compliance with a VIIa-wide TAC.
 - o Define what evidence would trigger changes to fishing location, timing or intensity.
- An overall stock assessment cannot, by itself, demonstrate that sufficient prey remains available in the locations and seasons where predators need it.
- Under 3.3, specifically which 'key parts of the UK fishing fleet' require REM and improved monitoring?
- Policy Goal 4 – NWIFCA supports the aim to preserve opportunities for coastal communities, particularly in Northern Ireland where the fishery has significant socio-economic importance, but this goal cannot assume an expansion of the fishery is sustainable, given the current dire strait of the stock.
- NWIFCA supports spawning and nursery habitat protection as covered under actions 1.3, 3.3, 3.5 and 3.9.

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

No

Comments:

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 pelagic FMP?

No

Comments:

How to respond