

Introduction

Wales Environment Link's Marine Working Group is a coalition of environmental organisations campaigning for healthy, productive seas. We contribute to various Welsh Government stakeholder groups, including the Welsh Government's Seas and Coasts EU-exit roundtable group and the Welsh Marine Fisheries Advisory Group (WMFAG).

Greener UK is a group of 13¹ major environmental organisations, with a combined public membership of over eight million, united in the belief that leaving the EU is a pivotal moment to restore and enhance the UK's environment.

Our response has been put together by organisations focused on marine issues in both Wales Environment Link and Greener UK.

We welcome the opportunity to respond to the Climate Change, Environment and Rural Affairs Committee inquiry on the implications of Brexit for the fishing industry in Wales. Our key points are summarised below with more detailed comments provided under each of the Committee inquiry questions that have relevance for the environment.

Key points

- Historically, marine areas around Wales have suffered significant habitat and species loss. Fisheries management decisions must **consider these baselines with a focus on enabling recovery where possible**.
- The **sustainability of commercial fish stocks and our fishing industry is inextricably linked to the health of the wider marine environment**; the management of our marine resources, including fisheries, should be treated holistically taking an ecosystem-based approach. We would like to see "fisheries management" referred to as "sustainable marine management".
- Governance of fisheries management should be inclusive, democratic and robust. It should guarantee **representation of the small scale fleet, environmental nongovernmental organisations and other relevant stakeholders in decision making**.
- The delivery of fisheries and wider marine management measures have been significantly delayed in Wales, with **capacity (including legal capacity) within Welsh Government a significant constraint**.

¹ A further 32 organisations are listed supporters of Greener UK, sharing Greener UK's goals and aligning their own activities with Greener UK where appropriate.

- Brexit provides an **opportunity to develop a world-leading sustainable fisheries management system in line with the Sustainable Management of Natural Resources; supporting economic, environmental and social sustainability.**
- The marine environment – including its commercial fish stocks – is a dynamic system that does not respect borders; Wales must **achieve cooperative management of shared stocks** to avoid negative environmental consequences.
- A jointly agreed, co-designed common framework across the UK, with clarity on the responsibilities of all administrations and regulatory alignment with the EU is needed to ensure **a consistent approach to the management of shared environmental challenges.**

To what extent do current Welsh fisheries policies and wider management measures deliver desired outcomes?

1. *EU and international agreements*

Wales' fisheries management has until now been heavily influenced by European legislation and International agreements, such as the UN Convention on the Law of the Sea (UNCLOS). **Policies, such as the Common Fisheries Policy, have enhanced sustainability in recent years.**

For example, many fish stocks throughout the EU have recently shown positive signs of recovery from overexploitation². Indeed, the Scientific, Technical and Economic Committee for Fisheries report³ on the performance of the Common Fisheries Policy states: *“In the ICES area, among the 61 to 69 stocks which are fully assessed, the proportion of overexploited stocks [...] decreased from more than 70% to close to 40%, over the last ten years. The proportion of stocks outside the safe biological limits [...] computed for the 40 stocks for which both reference points are available, follows the same decreasing trend, from 65% in 2003 to 38% in 2015”*. It is essential that we continue to **build on this progress to achieve sustainable levels of fishing for all stocks.**

International agreements such as UNCLOS and the Convention on Biological Diversity (CBD) are essential to ensuring that the marine environment is managed under a broad, transboundary framework that will help to promote recovery at a regional level. These agreements do not limit the UK, but enable us to work cooperatively with neighbouring countries that share marine resources, such as commercial fish stocks, or are connected within a common environmental area (e.g. the Irish Sea). **International commitments are vital to ensure recovery of the environment, sustainability of commercial stocks and stability of the fishing industry** into the future. A new fisheries management system must continue to deliver on our international commitments.

2. *National policy – UK Marine policy*

The Marine Strategy Framework Directive (MSFD) was introduced in 2008 by the EU to promote sustainable use of seas and conserve marine ecosystems. The MSFD has been transposed into UK law through the Marine Strategy Regulations (2010), alongside the Marine Strategy (in three sections) which has been produced and agreed by the UK and devolved administrations. The main

² For example: [EEA: Status of Marine Fish Stocks](#); [Current Biology: Reversal of fish stock decline in the Northeast Atlantic](#); and, [MSC press release: North Sea cod recovery](#)

³ European Union, 2017. Scientific, Technical and Economic Committee for Fisheries: [Monitoring the performance of the Common Fisheries Policy](#).

goal of the Marine Strategy Regulations is to achieve Good Environmental Status across European seas by 2020⁴. The UK Marine Strategy states “*appropriate fisheries management measures will make a positive contribution to the achievement of the GES targets proposed for Descriptor 1 (biodiversity), Descriptor 3 (commercial fisheries), Descriptor 4 (food webs) and Descriptor 6 (seafloor integrity)*”⁵. We believe that **the common UK framework provided by the Marine Strategy Regulations, the Marine Strategy targets and their indicators is a great strength and should be retained**, whilst allowing each UK country the freedom to take the necessary actions to meet or go beyond these targets.

More focus on the delivery of the strategy is needed going forward to ensure GES is achieved. It should be recognised that the Marine Strategy relies on the Common Fisheries Policy to deliver on targets in Descriptor 3 (commercial fisheries). As a result, **future UK and Welsh fisheries legislation and policy must focus on ensuring the achievement of Good Environmental Status** under the UK Marine Strategy Regulations.

3. *Welsh policy and management*

Resource and capacity constraints

When asked about delays in the delivery of marine management measures, including fisheries, Welsh Government have cited **capacity constraints, particularly legal capacity constraints resulting from the UK’s exit from the EU**. Indeed, the vast majority of the Welsh Marine Fisheries Advisory Group (WMFAG)’s priority workstreams on fisheries – such as Whelks and Scallops – have been delayed significantly. These delays have also applied to Welsh Government’s ambition to introduce adaptive management of fisheries, which would have the potential to allow sustainable management measures to be introduced far more quickly where needed. **Capacity has also been given as the reason for the delay in introducing management measures for Marine Protected Areas** to ensure compliance with the Habitats Directives⁶. It is imperative that this is addressed.

It should be recognised that an additional £0.5 million was allocated to the marine and fisheries division within the most recent Welsh Government budget. Assembly scrutiny⁷ of the Welsh Government Draft Budget 2018-19 recommended “the Welsh Government should **report back to the Committee within the next six months with details of how the £2.3 million of funding is allocated for marine and fisheries**. This should include details of the spending plans for the

⁴ The [Marine Strategy Regulations \(2010\)](#) define Good Environmental Status as “*the environmental status of marine waters where these provide ecologically diverse and dynamic oceans and seas which are clean, healthy and productive within their intrinsic conditions, and the use of the marine environment is at a level that is sustainable, thus safeguarding the potential for uses and activities by current and future generations, i.e.: (a) the structure, functions and processes of the constituent marine ecosystems, together with the associated physiographic, geographic, geological and climatic factors, allow those ecosystems to function fully and to maintain their resilience to human-induced environmental change. Marine species and habitats are protected, human-induced decline of biodiversity is prevented and diverse biological components function in balance; (b) hydromorphological, physical and chemical properties of the ecosystems, including those properties which result from human activities in the area concerned, support the ecosystems as described above. Anthropogenic inputs of substances and energy, including noise, into the marine environment do not cause pollution effects*”.

⁵ UK Government, 2015. [Marine Strategy Part Three: Programme of Measures](#).

⁶ Natural Resources Wales, 2016. [Assessing Welsh Fisheries Activities Project](#).

⁷ National Assembly for Wales, 2017. CCERA Committee: [Scrutiny of Welsh Government Draft Budget 2018-19](#).

additional £0.5 million allocated to marine and fisheries”⁸. We are unaware of this having yet been done. However, recent papers shared with the Welsh Marine Action and Advisory Group detail some spending of the marine and fisheries division of Welsh Government. This highlights a **comparatively low expenditure on marine environmental outcomes** (including the completion and management of marine protected areas) and demonstrates the lack of prioritisation of marine enhancement and recovery.

Sustainable marine management - processes and engagement

The Wales Marine and Fisheries Strategic Action Plan (2013)⁹ stated Welsh Government’s commitment “to implementing an ecosystem based approach¹⁰ to the management of our seas”. However, it is our view that in practice, **the delivery of Welsh fisheries policies and management do not sufficiently embed an ecosystem approach, with ‘fisheries’ and ‘marine’ often dealt with through separate stakeholder groups and processes.**

The artificial separation between the wider marine environment and ‘fisheries’ is evident in the Welsh Marine Fisheries Advisory Group structure. Whilst the recommendations of this group have direct implications for the marine environment, **the group membership is predominantly fishing industry representatives, with only one non-statutory environmental representative on the group at present**¹¹. This group is often referred to as a “fishing industry group”, however, the recommendations of the group have direct implications for the environment.

Similar concerns have been raised regarding Welsh Government’s Seas and Coasts Brexit roundtable group. Whilst a range of stakeholders attend this meeting, the agenda and associated projects commissioned by Welsh Government has focused on fisheries above and beyond other marine issues resulting from Brexit. Wales Environment Link members have sought to encourage more work within this group on the wider impacts to coastal communities from Brexit but **Welsh Government’s structure, for example with tourism covered under a different portfolio, has been cited as a challenge to taking this forward.**

In summary, a **“sustainable marine management” approach which better recognises the intrinsic linkages between fisheries, other marine management and coastal community issues is needed**, with a more inclusive method of stakeholder engagement around fisheries management in this context. The structure and priorities of the Marine and Fisheries Division of Welsh Government could be revisited to address this. Furthermore, Welsh Government should consider mechanisms to create meaningful place-based arrangements to **secure local stakeholder**

⁸ “In its report on the management of MPAs, the Committee recommended that the Welsh Government should explore the potential of funding an area-based approach to MPA management, with each management area having a dedicated officer. Given that additional funding has been made available in this area, the Committee is eager to know what consideration was given to such an approach.”

⁹ Welsh Government, 2013. [Marine & Fisheries Strategic Action Plan](#).

¹⁰ The [Marine Strategy Regulations \(2010\)](#) defines ‘an ecosystem-based approach’ as one which: ensures that the collective pressure of human activities within the marine strategy area is kept within levels compatible with the achievement of good environmental status; and does not compromise the capacity of marine ecosystems to respond to human-induced changes.

¹¹ WMFAG membership: Welsh Government; Natural Resources Wales; Welsh Local Government Association; Seafish Industry Authority; Wales Environment Link; Welsh Aquaculture Producers Association; Welsh Federation of Sea Anglers (WFSA); Welsh Fishermen’s Association; Cardigan Bay Fishermen’s Association; Llyn Pot Fishermen’s Association; Llyn Fishermen’s Association; North Wales Fishermen’s Co-operative Ltd; South West Wales Fishing Communities; West Wales Shellfisherman’s Association.

input across all marine interests. Following the dissolution of Inshore Fisheries Groups (IFGs), we are concerned that local stakeholder engagement and participation has been limited.

Sustainable Management of Natural Resources

Part 1 of the Environment Act (2016) introduced the concept of Sustainable Management of Natural Resources (SMNR), towards which Welsh Government restated its commitment in the Natural Resources Policy (2017)¹².

The definition of SMNR is often confused within Welsh marine management (including fisheries) policies and delivery. For example, instead of the full definition of SMNR, the objective of SMNR¹³ is used in isolation e.g. in the Welsh National Marine Plan (Annex 1)¹⁴. As a result, **the focus of SMNR is often misinterpreted to mean “sustainable use”**. Rather, the **definition of SMNR includes taking promotive action to maintain and enhance ecosystem resilience and, crucially, not taking actions where they would hinder achievement of this objective**¹⁵. It is important that Welsh Government policies recognise this distinction and provide further clarity on how all decisions are contributing to (and being assessed as contributing to) SMNR. Evidence of Welsh Government’s application of the principles¹⁶ of SMNR is an important way in which Welsh Government can demonstrate this but this should not be used alone to assess whether SMNR is being satisfactorily delivered – the full definition and the principles need to be considered.

Assessing Welsh Fisheries Activities Project

Welsh Government are working with Natural Resources Wales on a project to evaluate the impacts of fishing on features of Marine Protected Areas (MPAs) in Wales; this is a key process for contributing to SMNR in the marine environment. Its purpose is to identify where there is a risk that the interaction between fishing gear and a MPA feature could have a potential negative affect. The purple assessments, produced by NRW and published online in Spring 2017, identify the highest risk between site feature and gear interactions. However, there have been **significant delays in Welsh Government’s delivery on this and, as yet, no decisions or public communication on management required by the assessments**. A new role within the Marine and Fisheries Division to drive forward this work has recently been created and we look forward to working with the team to participate in stakeholder engagement events around this project (which must be well-managed with good communications). However, our understanding is that legal capacity within Welsh Government to assist in taking forward any necessary management measures is significantly reduced due to Brexit. **Addressing legal capacity issues for the Marine and Fisheries division is an urgent need.**

¹² Welsh Government, 2017. [Natural Resources Policy](#).

¹³ The objective is to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing—(a)meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and (b)contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015.

¹⁴ Welsh Government, 2018. [Welsh National Marine Plan](#).

¹⁵ The Environment Act defines SMNR in three parts: 1. Using natural resources in a way and at a rate that promotes achievement of the objective 2. Taking other action that promotes achievement of that objective, and 3. Not taking action that hinders achievement of that objective.

¹⁶ [Part 1.4 of Environment \(Wales\) Act](#), 2016.

Welsh National Marine Plan

The draft Welsh National Marine Plan was released for consultation towards the end of 2017. Wales Environment Link submitted a detailed response¹⁷ to the consultation. In summary, our response on the fisheries policies highlighted that whilst some policies sought to encourage **positive protections for spawning and nursery grounds**, this section included **inappropriate definitions and seemingly arbitrary evidence need lists**. For example, the “benefits and costs of marine protected areas” was included as an evidence need without any rationale provided. We were particularly concerned about the prioritisation given by the Plan to the exploitation of under-utilised species, without a framing of the need to work within environmental limits and to enhance ecosystem resilience, in line with the Welsh Government’s duties towards sustainable development and the sustainable management of natural resources.

What outcomes and policies does Wales want to see from the UK Fisheries Bill?

A recent poll¹⁸, conducted by YouGov, has shown that there is **widespread support amongst the British public for new laws that ensure we fish responsibly and protect the marine environment, with 79% who believe governments have a moral duty to ensure sustainable fishing.**

As we prepare to leave the Common Fisheries Policy (CFP), the development of new domestic fisheries legislation is a once in a generation opportunity to establish the UK, including all its constituent nations, as world leaders in sustainable fisheries management. This would contribute to the Welsh Government’s duties under the Environment Act (2016) and Wellbeing of Future Generations Act (2015). **Future fisheries legislation (whether developed by the UK or devolved administrations) should fit within a framework of a wider marine policy – recognising that fisheries and the marine environment are intrinsically linked – that applies an ecosystem-based approach and aims for recovered and biodiverse seas.** Thriving fish stocks and well-managed seas are critical for a profitable and prosperous fishing industry and, ultimately, fisheries are a common public resource and should be managed for the public benefit.

Our vision is for thriving, sustainable fisheries, set within a healthy marine environment with resilient ecosystems, which support coastal communities and provide consumers with a high quality, sustainable product.

This is an aspiration behind which all stakeholders, including the fisheries sector, are united. The UK Marine Policy Statement confirms that the UK and devolved governments have a shared vision of “clean, healthy, safe, productive and biologically diverse oceans and seas”. As the UK prepares to leave the EU, it is imperative that the **governments work together to create new fisheries laws that deliver this vision and put sustainability at the heart of fisheries management.**

To achieve this, all future fisheries legislation and policy must enable fisheries management to be:

¹⁷ Wales Environment Link, 2018. [Response to draft Welsh National Marine Plan.](#)

¹⁸ Client Earth, 2018. Press release: [British public overwhelmingly support greater fisheries protections after Brexit.](#)

Key Principles for post-Brexit fishing legislation

1. Holistic

Fish should be managed as a public resource and an integral part of healthy ocean ecosystems, taking account of the cumulative impact of human activities on the environment.

2. Sustainable

All fish stocks should be restored and maintained above biomass levels capable of producing the maximum sustainable yield.

3. Science-led

The best available and independent science should underpin fisheries management decisions.

4. Accountable

Fisheries should be fully transparent, with target and non-target catches fully documented, infringements properly enforced and fisheries managers effectively held to account. It is essential that the governments of the UK work together to secure appropriate new environmental governance arrangements across the UK, to address the governance gap that will arise through Brexit.

5. Fair

Fishing opportunities need to be allocated on the basis of transparent and objective environmental, social and economic criteria, in a way that encourages the most sustainable fishing.

6. Equivalent

The same high environmental standards should apply to all vessels fishing in UK waters, and to vessels from the UK fishing in other waters.

The Fisheries Bill

The 2017 Queen's Speech confirmed that the UK Government would introduce a Fisheries Bill with the limited aim "to control access to the UK's waters and set fishing quotas once we have left the EU". This leaves the remainder of the CFP, including environmental and sustainability legislation, to be transposed as part of the EU (Withdrawal) Bill.

Below, we outline how WEL & Greener UK's principles above can be embedded in the Fisheries Bill.

Holistic

To seize this opportunity to create bespoke, fit for purpose fishing legislation and establish the UK as a global leader in sustainable fisheries management, the Fisheries Bill should include general objectives that are the central pillars of sustainable fisheries management. Public bodies exercising functions relating to fisheries management should be under a strong corresponding duty to act in accordance with the objectives.

The objectives should set out that: ‘Fish are a public resource and must be managed for long term sustainability. They should require that regulators use precautionary and ecosystems based approaches to minimise and, where possible, eliminate, the negative impacts of fishing on the marine environment in a way that’s consistent with national and international legislation.’

Sustainable and science-led

All fish stocks should be restored and maintained above biomass levels capable of producing the maximum sustainable yield. The total allowable catches for fish stocks within the UK EEZ (including Welsh waters) must be set according to the best available scientific advice from established, independent and internationally recognised scientific institutions, so that fish stocks are maintained above levels capable of producing the maximum sustainable yield. Authorities should also be empowered to adopt adaptive management strategies that take into account changes to fish stock distribution and abundance, such as those caused as a result of climate related impacts on fisheries and the wider marine environment.

Accountable

Fisheries should be fully transparent, with target and non-target catches fully documented, infringements properly enforced and fisheries effectively held to account. All catches of species which are subject to catch limits should be recorded on board and counted against allocated quota. All vessels, no matter the size, must be subject to a Vessel Monitoring System¹⁹. In addition, an effective Remote Electronic Monitoring system, using cameras and sensors, should be required on all vessels over ten metres in length²⁰; and where particular issues have been identified that require monitoring, such as a heightened risk of cetacean bycatch.²¹ To reduce unwanted catches in the first instance, regulatory bodies and decision makers should be empowered to incentivise more selective fishing methods and gear types. UK and devolved fisheries legislation should provide an overarching framework that promotes and empowers strong monitoring and enforcement action.

Governance of fisheries management should be inclusive, democratic and robust. It should guarantee representation of the small scale fleet, environmental nongovernmental organisations and other relevant stakeholders, ensuring that those with an interest in creating and maintaining effective management plans for their local area or for the offshore area are involved in decision making.

Further, there should be robust mechanisms for assessing, facilitating and strengthening the implementation of, and compliance with, obligations arising under fisheries legislation. Regular reporting to the parliaments of the UK, including the Welsh Assembly, on the implementation of UK fisheries legislation and the state of UK fish stocks should be required. Reporting must be made public and tied into requirements to take action to improve implementation and remedy any noncompliance.

¹⁹ A project to roll-out Inshore VMS to the fishing industry under 10m has commenced in Wales and is expected to be delivered by 2021. This is not currently required by legislation.

²⁰ WWF, 2017. Report: [Remote Electronic Monitoring: why camera technology is a cost-effective and robust solution to improving UK fisheries management.](#)

²¹ ASCOBANS, 2015. Report: [Recommendations on the requirements of legislation to address monitoring and mitigation of small cetacean bycatch.](#)

Fair

Transparent and objective criteria based upon environmental, social and economic factors should be used when allocating quota.²² Public authorities should promote stewardship of fish stocks and the wider marine environment by providing incentives for fishing activities that will have a reduced environmental impact.

Equivalent

The same high environmental standards should apply to all vessels fishing in UK waters. Regaining control of the UK Exclusive Economic Zone (EEZ) means that the UK and devolved administrations can set high environmental standards for all fishing activities. Consistent with international law, all foreign vessels fishing within UK (including Welsh) waters should be required to comply with the rules set down in domestic fisheries and environmental legislation, regulation and policies.²³ The rules should apply to UK vessels at all times, whether they are fishing within or outside UK waters.

Protecting the marine environment

Fishing vessels must be required to comply with any applicable marine protected area (MPA) management regime or conservation measures, such as those established under the Marine and Coastal Access Act 2009. In protected areas, fishing activities should be able to be restricted or prohibited to contribute to the conservation of aquatic life and marine ecosystems. Competent authorities must also be empowered to introduce temporal or spatial fisheries management measures and other technical measures outside of MPAs, such as temporary closures or gear specifications in certain areas, where necessary, to protect biologically sensitive species and habitats. UK vessels fishing outside UK waters should also be required to comply with any applicable marine management, spatial planning or conservation regimes that exist for the area where fishing activity is taking place.

How can policy best reflect the needs of different sectors, including the fishing industry, aquaculture and coastal communities?

We refer to our response referencing quota allocation (p. 9, discussing fairness) and a more holistic approach to marine management and stakeholder engagement (p. 4, discussing sustainable marine management).

It should also be recognised that sustainable marine tourism and recreation brings significant benefits to marine coastal communities and the economy. This is often not given sufficient recognition in marine management policies and plans, such as the Welsh National Marine Plan.

What are the main challenges and opportunities for fisheries during the transition period and post-Brexit?

Given the predominance of shellfish fisheries in Wales and the reliance on exports to the EU, trade represents a significant challenge for fisheries in light of the UK's departure from the EU. In addition, an EU notification to stakeholders²⁴ made clear the need for the UK to prepare for export certification and to uphold international agreements; *"the catch certificate to be validated by the United Kingdom must certify that the catches concerned have been made in accordance with*

²² An example of how this may work: ['Who gets to fish for sea bass? Using social, economic, and environmental criteria to determine access to the English sea bass fishery'](#).

²³ This is a requirement for flag states under international law, as clarified in: [International Tribunal for the Law on the Sea: Request for an advisory opinion submitted by the Sub-Regional Fisheries Commission, ITLOS Case 21, April 2015.](#)

²⁴ EU Commission, 2018. [Notice to stakeholders: Withdrawal of the UK and EU rules on fisheries and aquaculture.](#)

applicable laws, regulations and international conservation and management measures". It is anticipated that this shall require a greater level of monitoring of the fishing industry in the UK to ensure compliance. This presents an opportunity for enhanced data and evidence on fisheries location and effort which should be used to **enhance the evidence base upon which fisheries and marine management decisions are made**. This data could also be used to build upon the evidence base underpinning the Marine Plan.

As referenced previously, Brexit offers an opportunity to reallocate new quota according to different criteria. Effectively, this would be building on Article 17 of the Common Fisheries Policy²⁵, which has not yet been well implemented across the EU. Brexit therefore offers an opportunity for the UK and Wales to be world leaders in sustainable and fair fisheries management.

As highlighted, challenges to fisheries management also arises from capacity constraints within the civil services, including legal capacity.

A recent report by the Wales Centre for Public Policy²⁶ highlighted the potential for Wales to secure additional quota following EU-exit for offshore areas of the Irish Sea. However, this would require a fundamental change to quota allocation processes and require a substantial level of financial investment to equip the (currently predominantly inshore) Welsh fishing fleet with the vessels and equipment needed to fish these offshore waters. It is currently unclear how much appetite there is across the fishing industry of Wales to pursue this but it is understood that this is nonetheless a priority of the Welsh Government Marine and Fisheries EU exit team.

Should quota be re-allocated to Wales for this purpose, challenges may arise for Welsh Government regarding their commitment to SMNR; whilst making an assumption that fishing pressure would remain the same, it is evident that offshore fisheries in this area, particularly Nephrops fisheries, can have a substantial environmental impact inconsistent with Welsh Government's Biodiversity and Ecosystem Resilience duty²⁷. Given the prioritisation of this, **Welsh Government must ensure that if these fisheries are developed, it is done in a manner that seeks to enhance ecosystem resilience; ensuring more selective and sensitive gear than is currently the norm in these fisheries.**

Given that a significant amount of money would be required to develop this potential new fishery, WEL would seek assurances that any public resources would not be used to provide assistance to exploit this fishery but rather ensure that the fishery is sustainably managed. Transparency is needed from Welsh Government on how much public money has so far been committed to this and details on how any new budget will be spent. **Any amount of public resource should be focused on ensuring public good (recognising that food is not a public good) and research to ensure this project's compatibility with Wales' environmental objectives.**

Please feel free to address any other issues in your response.

There has been a lot of coverage of the Fishing for Leave (FFL) campaign which wants to replace the current science-based quota system with an effort-based management system which assigns 'Days at Sea' where fishermen can land all that they catch on those particular days. The campaign promotes a message that catch quotas don't work in mixed fisheries.

²⁵ Institute for European Environmental Policy, 2014. [Practical implication of Article 17 of the CFP.](#)

²⁶ Wales Centre for Public Policy, 2018. Report: [Implications of Brexit for fishing opportunities in Wales.](#)

²⁷ [Part 1.6 of Environment \(Wales\) Act](#), 2016.

Although the concept of a Days at Sea regime may appear to be a simple alternative solution (to the challenges of operating the Total Allowable Catches (TACs) and quotas system in the context of the landing obligation, as currently drafted) there are many reasons why it should not be introduced in the UK:

- It is an unsophisticated system which is **commonly introduced in countries which have no established fisheries management system for setting catch limits based on science and has failed consistently in countries where it has been trailed or introduced** (e.g. Faroes, New England).
- It can quickly lead to 'effort creep' where fishermen develop more efficient methods of fishing over time, with the result that they **take an increasingly greater number of fish out of the sea over the same number of days, leading to overfishing.**
- It undermines an ecosystem based approach as it **does not take into account the vulnerability of some species.** In the Faroes this has led to a decline in some key stocks.
- It would create a **dual system for shared stocks (i.e. whereby the UK uses a Days at Sea system whilst the EU uses a quota system)** which means that fishermen can race to fish each stock, leading to overfishing as well as undermining efforts to rebuild vulnerable species.
- It **does not allow for effective monitoring and reporting** for all catch in the way that science based quota systems do.
- It is **easily manipulated** in a way which would exacerbate current conservation issues, such as improving stocks to sustainable levels. Particularly the use of percentages as a control as these are very easy to manipulate.
- It **preserves the status quo** without any ambition for improvement or recovery of stocks or the marine environment.

WEL would be happy to provide any further information to the Committee and welcomes the work being conducted in this area.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is a respected intermediary body between the government and the environmental NGO sector in Wales. Our vision is a healthy, sustainably managed environment and countryside with safeguarded heritage in which the people of Wales and future generations can prosper.



This briefing represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.

Greener UK is a coalition of 13 major environmental organisations united in the belief that leaving the EU is a pivotal moment to restore and enhance the UK's environment.

Greener UK is also working with   

GREENER UK

