



North Atlantic Fishing Company's Response to the Government's White Paper: Sustainable fisheries for future generations

Introduction

North Atlantic Fishing Company Limited is a UK company based in Caterham, England. Our main focus of activity is in the area of Pelagic Fisheries

Q1 Do you agree with the powers in the Fisheries Bill?

North Atlantic broadly agrees with the powers in the Fisheries Bill

Under a restatement of the Government's commitment to sustainability principles, these powers include:

- Authority to set quotas in line with international agreements on TACs
- Authority to determine who is permitted to fish within the UK EEZ and under what conditions
- Authority to amend retained EU fisheries legislation
- A range of powers to manage UK fisheries after the UK leaves the EU

It is important that the UK government represents the whole of the UK in fisheries negotiations with 3rd party countries. No independent Devolved Administration representations should be countenanced.

However there is a lack of detailed information with regard to those powers that will be given to devolved administrations to manage local fisheries and it would be useful to see what is proposed before any final fisheries bill is proposed.

It is important in a post Brexit UK where all 4 administrations are setting fishing policy that England has its own Minister of Fishing as the other administrations currently do failure to solve this democratic deficit will mean that England will be open to concessions being given away to other UK administrations in an attempt to appease local interests i.e. The Concordat

Q2 What are your priorities for negotiations with the EU on fisheries?

Our priorities are to see:

1. The free and unencumbered trade between the UK and the EU with no tariff barriers or non-tariff barriers

2. The UK as an independent coastal state; free to act as an independent party in international fisheries negotiations, in line with international law (UNCLOS)
3. For annual reciprocal fisheries agreements to be agreed as the vehicle for cooperation on the management of shared fish stocks
4. The long term management of the UK marine environment together with neighbouring states
5. UK control over who can fish in UK waters and under what terms, residing unambiguously with the UK, and an exclusive 12 mile limit to protect our inshore fisheries

Q3 What are your priorities for controlling our waters after exit?

Effective control over the totality of fishing activities within the UK EEZ

The physical ability to control access over who is permitted to fish in UK waters and under what conditions

The constructive and productive relationship with the EU

Against this background, therefore, our priority is for a rebalancing process through which EU vessels will be permitted to continue to fish in UK waters

The loci of those negotiations should be the annual fisheries agreements, which should set fishing opportunities within sustainable limits

No UK fishing interests should emerge from the process of leaving the EU worse off than it was prior to the UK's departure.

North Atlantic is one of the only Pelagic Fishing Companies in England with a much more powerful Pelagic industry in Scotland. The Government needs to keep in mind both the diversity of interests across our fleets and those who could be disadvantaged as well as those who stand to gain directly from rebalancing quota shares.

Q4 What are your priorities for the UK's international role in fisheries (beyond the EU)?

North Atlantic agrees that all international fisheries negotiations should be led by UK ministers or officials, ultimately accountable to the Westminster Parliament.

The Secretary of State, as the White Paper states, should remain the final arbiter in any disputes of UK priorities during international fisheries negotiations.

The UK should do what is necessary to maintain our existing relationships with third countries, join all relevant RFMOs as an independent party, and seek additional fisheries opportunities, where these are available.

The UK's relationship with Norway is the most important fisheries relationship our country has outside the EU.

Agreement and co-operation with Norway is crucial to Pelagic interests

It is therefore crucial that the UK take its full place in international (bilateral or trilateral) negotiations with Norway and the EU.

Q5 What are the fisheries policy areas where a common legislative or non-legislative framework across the UK is necessary?

We support:

- The UK delegation in international fisheries negotiations to be led by UK officials or ministers
- UK ministers to be the final arbiter in any dispute over priorities in international fisheries negotiations
- The principle of equal access for all UK fishing vessels within the UK EEZ
- A framework which protects the UK single market, including, transactions in fishing vessels, fishing vessel licenses, FQAs and quota leasing

The right of UK fishing vessels to land in any UK port for any length of period without prejudice to administrative status

Q6 Do you have any further comments relating to the issues addressed in this section?

N/A

Q7 Do you agree with the measures proposed to ensure fishing at sustainable levels?

We strongly support measures which deliver high sustainable average yields for all of the fisheries prosecuted by UK fishing vessels.

We support the objective of setting exploitation rates with reference to the maximum sustainable yield, recognising:

- Scientific opinion that given the biological realities, it will not be able to hold all stocks at MSY simultaneously, not least because of predation effects and dynamic environmental conditions
- An arbitrary and unachievable MSY timetable is not consistent with a science-based fisheries policy
- Management of stocks in mixed fishery configurations poses particular challenges
- Setting TACs within the context of implementation of the landing obligation will require new flexibilities including:
 - The use of F ranges
 - Soft stops
 - Choke mitigation strategies

The UK's fisheries policy will have to strike a balance between ambitious targets and practical realities, and the livelihoods and fishing businesses which are affected by management decisions. An evidence-based, proportionate, approach

which weighs evidence and risk in an objective, impartial, way should be the foundation on which our future management system is based.

The corollary is that UK should avoid adopting ambitious-sounding but scientifically illiterate, impractical and unachievable targets.

Q8 Do you agree that existing quota should continue to be allocated on an FQA basis?

Given case law in the English courts and the fact that North Atlantic Fishing Company has invested in FQAs over the last 20 years, we consider that FQAs represent a proven method for allocating quota and have provided for financial stability within the industry and as a rights-based system have also made a significant contribution to the sustainable exploitation of our fish stocks. We therefore support the proposal in the White Paper that for *existing* quota FQAs should continue to be the basis of allocation.

Q9 How should additional quota that we negotiate as an independent coastal state be allocated?

The Definition of additional quota needs to be clarified however it is our opinion that 'additional quota should be apportioned based upon the FQA holdings in each devolved administration. Each administration can then decide how to allocate additional quota taking into account; swaps at government level; community fishing schemes; quota available for scientific research etc.

However

1. No party should find themselves worse off; in particular, England, Wales and Northern Ireland should maintain at least their current quota shares
2. The principle of equity should apply
3. All UK fishing vessels should maintain full access to all UK waters

Q10 Do you agree that Defra should run a targeted scientific trial of an effort system in English inshore waters.

No objection on a limited basis recognising that an effort system may seem attractive to certain sectors of the industry however it has been proven not to work with other areas such as Pelagic Fishing where FQAs have been proven to be successful

Q11 Do you agree with our proposals to explore alternative management systems for certain shellfisheries in England?

No objections

Q12 Do you agree that there is a case for further integrating recreational angling into fisheries management?

'Recreational Angling' fits into at least 2 categories of the Illegal, Unregulated and Unreported (IUU) categories. In order to have credible scientific data on managing fisheries catches from recreational anglers must be accounted for.

Q13 Do you agree with the proposed package of measures and initiatives to reduce wasteful discards?

The government has already proposed some tools for the elimination of discards however more can be done by taking examples from fisheries management around the world

Q14 Do you agree with the proposed approach to protecting our marine environment in relation to fisheries including the powers proposed in the Fisheries Bill (see section 1.2)?

A more joined up approach to assessing the marine environment is required, taking into account, not just the impact of different fishing techniques but also dredging, cable laying, drilling, wind farm erections, etc...

Q.15 What opportunities are there for the sector to become more involved in both the provision and direction of science and evidence development needed for fisheries management?

The current Fisheries Science partnership, between Defra, Cefas and the fishing industry provides a base on which to build on but we think that there is considerable scope for:

- Involvement in resource assessments
- Data collection
- Knowledge transfer

We consider that the UK will have to enter into its own MOU with ICES as it will no longer be covered by the EU MOU when it leaves the EU.

Q 16: Do you have any further comments relating to the issues addressed in this section?

With the upcoming ILO Convention 188 "Work in Fishing" scheduled for implementation during November 2018, it is vital to consider safety as an integral part of any future fishing legislation.

The Seafarers UK publication "Fishing for a Future" highlights the broad range of challenges faced by fishermen in regards to their Health, Safety and Welfare, and we consider that these should be of primary importance in both the DFT and DEFRA's considerations on future policies.

Q 18: Do you have any further comments relating to the issues addressed in this section?

N/A

Q 19: How far do you agree with our future vision to pursue a partnership approach with industry and others for sustainably managed fisheries?

We consider that a statutory based advisory system is required at the following levels:

- Science and Resources
- International negotiations
- Management systems
- Parliamentary processes

**North Atlantic Fishing Company
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