



# THE FISH PRODUCERS' ORGANISATION LIMITED

Registered Office:  
The Orangery,  
Hesslewood Business Park,  
Ferriby Road,  
Hessle  
HU13 0LH

TEL: Redacted

## **FPO RESPONSE TO THE UK GOVERNMENT WHITE PAPER: SUSTAINABLE FISHERIES FOR FUTURE GENERATIONS**

### **Introduction**

The FPO has been heavily involved in the drafting of both the NFFO and UKAFPO responses to the White Paper and we broadly support all comments and answers expressed in these drafts. Please accept our overall response to be in-line with these positions and where there are areas we feel require further information or discussion for our membership these will be expressed in the response below.

### **Q1: Do you agree with the proposed powers in the Fisheries Bill?**

We agree with the proposed powers and that the UK needs the facility to set its own quotas and control its waters. Just as importantly the UK must have the power to negotiate and agree arrangements with third countries.

The proposed new powers need to be in place in a timely manner and in-line with the implementation period and eventual withdrawal.

New or amended law should be fully and appropriately considered in consultation with industry and other interested groups.

We support the development of a policy statement by the Secretary of State and look forward to seeing and considering it with interest.

While we do not object to improving MMO cost recovery in principle, we would like to see and consider the detail of any proposals before we could offer support to this measure.

### **Q2: What are your priorities for UK negotiations with the EU on fisheries?**

To agree UK quotas on a fair and equitable basis improving on those enjoyed under the system of relative stability. It should better reflect the abundance of stocks found in UK waters.

To de-link issues on quotas and access to waters from those on market access.

Fishing opportunities should be negotiated with the EU and third countries on an annual basis but under the rules of a multi-annual agreements.

To ensure the UK can continue to benefit from the integrated nature of the European fisheries industry.

No increase of non-tariff barriers to trade.

Tariff free access to the EU market. We support the aim of maintaining EU Free Trade Agreements (FTAs) and preferential arrangements. The importance of trading with the remaining EU should not be overlooked – we stress the integrated nature of the industry in Europe.

To ensure that during the implementation period the interests of the UK are not overlooked or compromised by Commission officials.

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

Access should only be granted in negotiation with corresponding benefits gained in return.  
The same rules and regulations should apply to third country vessels as those from the UK.  
Control and enforcement efforts concentrated on third country vessels and on a risk analysis basis.  
New management and control arrangements to be agreed in consultation with industry.

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

Agreements with third countries must provide at least the benefits to the UK currently received under EU agreements. Any reduction in fishing opportunities would only result in more imports replacing British caught fish.

The UK should apply for appropriate RFMO membership, particularly NEAFC and NAFO, at the earliest opportunity. The UK should play a full part in those organisations to ensure that stocks are managed sustainably and effectively. The UK should gain the maximum quotas it is entitled to in line with science and allocation criteria. The importance of NAFO fishing opportunities to UK vessels should not be overlooked. Consider the history of UK fishing in NAFO waters and how the possibilities could increase in future should the Grand Banks cod stock continue to recover. We agree that access will be a matter of negotiation, but access must not be given away lightly. There should be no long-term commitments agreed to regarding access. It must be recognised that access for UK vessels to third country waters is vitally important, providing additional fishing opportunity to the UK fleet.

Access to markets will be agreed as part of future economic partnerships – this statement would benefit from clarification. The importance of access to the UK market for fisheries products to Norway, Faroe Islands, Iceland and Greenland should be used as a primary negotiating tool in gaining access to fishing opportunities from those countries. This may appear inconsistent with the approach to access to waters for EU vessels but it is important to adapt the negotiating approach to individual circumstances.

UK should play a full role in other international organisations as necessary – e.g. CITES, WTO, FAO.

UK should apply and respect the international rules flowing from e.g. UNCLOS, UNFSA. UK should also play a full role in developing international fisheries rules in those organisations.

UK should be a standard setter and lead in sustainable fisheries, fight against IUU fishing, discard reduction, free trade and the best possible science.

To maximise UK fishing opportunities in the Svalbard Archipelago.

Greater integration of industry in future UK negotiating teams than has been the case in the EU. Something closer to the Norway model where industry is part of the team.

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

International negotiations on behalf of the best interests of UK.

Common standards and enforcement rules.

Effective operation of the internal market.

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

Although agreements with third countries cannot be concluded until 2020, the process of discussion, relationship building and negotiation should get underway as soon as possible. International agreements of this nature are rarely concluded quickly.

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

The future sustainability of fish stocks is in the interest of all. Whilst MSY should continue to be an aim it is also important to take into account the realities of complex multi-stock fisheries. A move

towards international obligations under UNCLOS to work towards MSY objectives rather than the CFP commitment to have all stocks at MSY by 2020 would be sensible.  
The UK should be a world leader in sustainable fisheries management.  
Decisions should be made on the basis of the best available science. This requires a commitment by Government to building and maintaining the UK scientific capability.  
We welcome the intention to publish an annual statement on the state of stocks and working with interested parties in developing any recovery plans.  
We agree that quota, rather than effort, should be the primary means of managing commercial fishing. Measures to control fleet capacity should also be explored.

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

Yes. It respects the investment and genuine interest of the companies and Producer Organisations have put into the industry and UK in the past.

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

Firstly, a clear definition of “additional quota” needs to be agreed and communicated to industry. Once the terms defining additional quota have been agreed this should be allocated between the devolved administrations using existing internal relative stability shares.  
We would wish to see an FQA reconciliation take place prior to this to ensure correct distribution in-line with any historical FQA sales between companies in different devolved administrations.

Below UK level, devolved administrations will allocate as they see fit and we would welcome engagement with industry at this stage to ensure additional fishing opportunities are used most effectively.

Historic participation in the fishery in question should also be respected.

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

Yes, depending on the detailed elements of the trial with Industry being fully involved and consulted in the development. It is essential that other parts of the UK fleet are not prejudiced by any such trial.

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

Yes.

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

Yes. The outtake of quota by recreational fishermen should be fully and properly accounted for in management. Suitable controls should be placed on recreational fishermen, in particular to ensure catches are not having a negative impact on stocks.

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

Yes, provided that any measures are fully discussed and agreed with industry to ensure they are practical, appropriate and enforceable.  
We support realistic measures to help industry deal with the problem of “choke” species.

We support the use of modern technology to ensure compliance so long as further financial burden is not placed on industry.

**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)?**

All catchers, including inshore and recreational fishers should be appropriately controlled and enforced.

Accurate and timely data collection and use is vital to effective management and planning.

We support measures designed to fight IUU fishing.

We support measures designed to reduce by-catch of cetaceans and seabirds.

**Q15. 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?**

Through a system similar to the Advisory Councils. For science to be truly appropriate and effective, industry needs to be involved and assured that the best science is in its interests.

This can be achieved through regular meetings between industry, officials and scientists.

**Q16. Do you have any further comments relating to the issues addressed in this section?**

No further comments.

**Q17: What would be your priorities for any future funding for the sector or coastal communities?**

Vessel safety, infrastructure and communications.

Support the aim of improving MMO efficiency.

**Q18. Do you have any further comments relating to the issues addressed in this section?**

No further comments.

**Q19: How far do you agree with our future vision to pursue a partnership approach with industry and others for sustainably managing fisheries?**

Fully agree. Partnership between Government and industry is vital to the future of fisheries and sustainability. It is vital that this is a true partnership, working both ways.

Any proposal for increased cost contribution needs to be fully discussed and agreed with industry to ensure the costs are balanced with corresponding benefits.

**Q20. Do you have any further comments relating to the issues addressed in this section?**

Fisheries policy is devolved but needs a degree of consistency across UK. Fully agree, UK Government should have the overarching responsibility for policy, particularly in relation to negotiations with third countries. The interests of one UK country should not override the interests of the whole. UK Government should lead in negotiations with third countries in consultation with the individual countries.