

Working together to
promote sustainable
fisheries and address the
nature and climate crisis



Future Fisheries Alliance's response to Defra's Consultation on: The Principles of Marine Net Gain

To whom this may concern,

Please find below the Future Fisheries Alliance (RSPB, WWF and Marine Conservation Society) response to the Consultation on the Principles of Marine Net Gain put forward by Defra on the 6th of June 2022.

If you have any queries about any of our responses or would like further information, we will welcome the opportunity to discuss this in further detail with you.

Sincerely,

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A handwritten signature in black ink, appearing to read 'Kirsten Carter'.

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A holistic vision for our seas supported by Marine Net gain

Marine Net Gain has the potential to become an important tool to drive marine recovery and enable ecosystems restoration. It is an ambitious concept and, with sufficient Government leadership to drive it forward, could allow for increased funding funnelled into large scale intervention to support biodiversity. However, for this system to truly be effective, it must not only be mandatory for all developments, but it must also take into consideration activities that have a negative impact on the marine environment, such as fisheries^{1,2,3} as highlighted by the Office for Environmental Protection (OEP)⁴. Marine Net Gain must be integrated into a holistic vision for our seas, that strategically considers developments, such as renewable energy, alongside activities, such as fisheries. Indeed, if it is to deliver gains for biodiversity, wider incidental environmental impacts, including displacement of activities and cumulative effects caused by the developments covered by the proposed system will need to be taken into consideration. Continuing to consider fisheries and aquaculture in a silo, removed from other marine industries and separated further by its lack of inclusion in a potential marine net gain system prevents its integration in a strategic vision for our seas, which considers all impacts, and ultimately limits Government's ability to consider joint solutions to remove pressures on the marine environment.

How can fisheries be better included in this process?

Before including wild caught fishing into a Marine Net Gain system, it should be fully incorporated into the Environmental Impact Assessment (EIA) regime. This would allow for a screening of the environmental damage of fishing activities prior to their licensing and their effective incorporation into the mitigation hierarchy, strategic compensation regime and, potentially in the future, the marine net gain system together with other developments. Alongside the conduct of Environmental Impact Assessment, Government needs to mandate experts to identify the maximum fishing effort, taking into consideration the cumulative impacts from other activities and developments, and use it as a starting point to define the level and types of fishing activity that are compatible with recovering the marine environment and the achievement of Good Environmental Status and the delivery of the objectives of the UK Fisheries Act. The OEP⁵, has also recommended incorporating wild caught fishing into the EIA regime. From there, the key measures to remove fishing pressure until that point can be identified, and potentially funded by Marine Net Gain.

The fishing industry as a key beneficiary of Marine Net gain

Besides the consideration of fisheries impact, the industry must also be considered as a beneficiary of marine net gain. For the sector to move to sustainable practices through a just transition, financial support will be needed. Whether to roll out active interventions or pressure reduction measures such as Remote Electronic Monitoring with cameras (REM), less damaging fishing gear or measures to prevent bycatch⁶, Marine Net Gain could play a key role in supporting implementation of these changes whilst limiting the impact on fishers if enabled by Governmental leadership and support. Doing so will however require the establishment of a transparent, robust and simple governance to guide the funding and enable action. This could be supported by the newly established Marine Spatial Prioritisation Programme, which aims to develop the holistic and strategic vision for our seas in 2050, and which will need to include all activities and developments to succeed in its task. Doing so will also help to consider wider incidental environmental impacts, including displacement and cumulative effects, as well as cross border implications, a key challenge when managing fisheries.

¹ https://www.researchgate.net/publication/248812391_Environmental_effects_of_marine_fishing

² <https://www.sciencedirect.com/science/article/abs/pii/S0964569198000374>

³ https://www.researchgate.net/publication/265158587_The_effects_of_fishing_on_non-target_species_and_ecosystem_structure_and_function

⁴ <https://www.theoep.org.uk/report/taking-stock-protecting-restoring-and-improving-environment-england>

⁵ <https://www.theoep.org.uk/report/oep-response-joint-fisheries-statement-consultation>

⁶ <https://www.sciencedirect.com/science/article/abs/pii/S0006320720309733>