



Summary of Responses to the consultation on the draft Isle of Man Fisheries Statement

Summary

There were 16 responses to the consultation on the draft Isle of Man Fisheries Statement.

Three responses were submitted that highlighted a failure to access the document, and have therefore been excluded from analysis. DEFA contacted these three individual respondents and invited them to consider the document and re-submit a response; however, no further responses were received.

Of the 13 valid responses, six were submitted on behalf of an organisation, including:

- the Department for Environment, Food and Rural Affairs (Defra) of the United Kingdom Government;
- the Manx Wildlife Trust;
- the Manx Fish Producers Organisation;
- the Manx Seafood Sector Advisory Committee;
- the Isle of Man Friends of the Earth; and
- one other organisation that did not wish for their response to be published.

The response from Defra was submitted via email and provides a general view of the draft Isle of Man Fisheries Statement, as opposed to answering the individual consultation questions.

The remaining seven responses were submitted by individuals, of which 4 wished for their response to be published anonymously, and one which did not wish for their response to be published.

The responses for which the Department was given permission to publish are presented below for each of the 5 questions contained in the consultation.

To what extent do you think the Isle of Man Fisheries Statement provides an appropriate framework for sustainable fisheries management policies, post-Brexit, in the Isle of Man territorial sea? - Q1

MFPO

It is vital that there is a coherent framework to enable the development of sustainable fisheries in the Territorial Sea. At present the situation whereby there is a Fisheries Management Agreement between the Isle of Man and the UK which still contains aspects of the Common Fisheries Policy, post-Brexit, is no longer tenable. The UK produced a Joint Fisheries Statement in November 2022 which laid out the policies and management strategy post-Brexit and it is only right that the Isle of

Man does the same. This must include a new Fisheries Management Agreement with the UK that recognises and respects the Isle of Man's independence and autonomy.

MSSAC

The executive summary of the Isle of Man Fisheries Statement quotes the following:-

'The fish stocks within the Isle of Man Territorial Sea are a Manx public resource and national asset to the island, and the IOMFS will help to ensure that they continue to benefit Manx fishing communities and the island as a whole, now and into the future.'

The Manx Seafood Sector Advisory Committee agrees fully with this statement. We must be recognised as independent and autonomous and be able to make our own decisions, provided we allow Fair Access, without having to consult with UK administrations.

The IOMFS not only needs to provide an appropriate framework for sustainable fisheries in the Territorial Sea but also needs to ensure that Manx vessels and processors have access to all of the commercial species that are found within the Territorial Sea. This will help to increase the fishing industry's contribution to Manx GDP but also open up new processing and marketing opportunities. The latter point is one that perhaps has not been covered in the IOMFS in that the Manx fishing industry is vertically integrated and selling and marketing is also very much part of creating sustainable fisheries. Under the section on 'Supporting the Sector' key performance indicators should perhaps include the creation of new products and the opening of new markets.

Under 'Future Support', marketing should be included as without appropriate levels of investment, access to new fisheries may not automatically lead to opening of new markets.

Geoffrey Comber

It covers the subject with sufficient depth and if implemented with consultation should hopefully secure a future for the fishing industry.

Shayne Forrester

A 25 page document written to obscure the objectives already decided upon.

MWT

Generally, MWT thinks this is an appropriate framework, building on the 2012 Fisheries Act linked with the Fisheries Strategy at that time.

If independent management from the UK is implemented, as suggested in the strategy document, this would be a major step forward and possibly allows designation of MNRs out to the 12nm, as it is currently only 0-3nm that have any designated. This would help to facilitate the Isle of Man in achieving 30% of territory protected by 2030. A healthy marine ecosystem will help support resilient and sustainable fisheries.

IOM Friends of the Earth

Largely appropriate, but certain aspects of sustainability need strengthening, particularly dredging. It may provide repeated annual catches, but is not sustainable in the wider true sense as even the first dredge of a season causes unacceptable damage to the seabed and its wider ecology.

ANON

Appropriate to state the environment as a national asset and to manage, preserve (and enhance?) the asset for optimum benefit of the island both now and for future generations.

Dredging should be severely restricted as much as possible, similarly to the Ramsey Marine Nature Reserve but across the whole 0-3m and 3-12 mile zones. The enhanced catch rate by restricting dredging effort would enhance fisheries' productivity, and, more importantly, the natural marine environment.

ANON

It is good but section 4.6 is weak. Too often we see big dredgers off the west coast with their AIS locator off. We will need better resourced fisheries protection.

ANON

Fishing should be stopped.

ANON

It would benefit from detail about tackling the twin Climate and Ecological Emergencies, including a commitment to designate a minimum of 30% of our territorial sea as fully protected and managed Marine Nature Reserves under the Wildlife Act 1990 by 2030, in line with our international commitment and mandate under the Convention for Biological Diversity.

What are your views on the Isle of Man Fisheries Objectives and their interpretation? - Q2

MFPO

The recent LTMP for King scallops was based on bioeconomic objectives and has been successful in matching fishing effort to the available resource, providing increased levels of income, within the first season post-LTMP, for the vessels permitted to fish. The principles of the Bioeconomic Objective:-

- a) Fishing activity is managed to ensure biological and economic sustainability.....meaning that activities are economically sustainable in the long term, and are managed so as to achieve economic social and employment benefits, and
- b) The fishing capacity of fleets is such that fleets are economically viable but do not over exploit the stocks.

has therefore been shown to be sound for this fishery.

It is later stated that 'short-term socio-economic decisions should not significantly compromise the long-term health of the marine environment.' In principle this is the correct approach but, as has been experienced with the queen scallop fishery, unless there is a support structure in place or access to alternative fisheries, then this could lead to a situation whereby Manx vessels are no longer economically viable and are sold or tied up, and crew lost to the industry.

The Precautionary Objective is often quoted in LTMP's or Fisheries Management Plans (FMP's). This can also be the lazy approach. A lack of knowledge, due to a lack of investment in science, should not be seen as a reason for limiting a fishery. The initial aim should be to establish a scientific baseline to the species with a stock assessment produced as soon as possible. It is often much easier to make a decision based on a lack of knowledge than commit to obtaining the additional evidence. With a co-management and appropriate levels of funding, either from government or through industry, there should be no excuse for a lack of evidence.

The precautionary objective should also not be used as a one size fits all approach. Short-lived species such as queen scallop, or even more so, squid and cuttlefish, need to be managed in a different way to longer lived species such as King scallop.

This leads on to the Ecosystem Objective and the Evidence Objective. Both of these are appropriately worded.

The Bycatch Objective is a challenging one within an island community. The Discard Ban that is currently in place in the UK, but not uniformly enforced, is not appropriate to an island community.

The commitment of DEFA to ensure that all catches of fish are accounted for is appropriate. A preference that all catches of fish subject to international quota arrangements are landed unless:

- There is strong evidence fish will survive the capture process, or
- There are limits to the application of technical mitigations, or
- Landing the fish will result in excessive disposal costs.

This is one aspect of fisheries management that needs to be devolved to the Isle of Man. What suits a large UK port with multiple processors and access to alternative markets for the by-catch species, particularly undersized fish, will not suit an island community with four ports of landing.

It is very difficult and expensive to provide strong evidence that a fish species will survive a capture process. This has been trialled on the Isle of Man with plaice caught as a by-catch from the queen scallop fishery. The facilities required to examine survival are simply not readily available on the Isle of Man. To have to do this for each species that could survive from each fishing method is impractical and would require huge investment. Manx boats fish for queen scallops using a trawl and so we cannot just jump on the back of other scientific analysis of survival rates from other queen scallop fisheries. We would have to produce our own evidence on survival rates for each of the by-catch species.

Technical mitigations have probably been taken as far as possible with the species currently targeted by Manx vessels. By-catch is already extremely low. If Manx vessels were to have access to quota fisheries within the Territorial Sea, such as the Nephrops fishery, where by-catch is likely to be higher, then technical measures to reduce bycatch have been developed by other administrations since the Discard Ban has been introduced. It should be noted that key to an increase in quota share for Manx vessels is the inclusion of potential bycatch species.

The third condition is the key point here. There simply isn't the infrastructure available to land all of the catch, both target species and bycatch species, at each of the four main Manx ports. The separation of each species into different fish boxes, plus the landing of all fish quota species below Minimum Landing Size is simply not viable. There isn't the space available on board our mainly inshore boats and there are no facilities to dispose of the fish on land.

The practical solution for an island community is that all catches should be recorded but returned to the sea where possible. Even if just 10% of a particular bycatch species survived being caught (and returned to the sea) then this has to be better than landing all of that species to a port, where it is guaranteed that 100% will die. Recording of the by-catch and avoidance is the most appropriate way forward for an island-based fishing fleet such as ours.

It is also noted that within this objective there is no mention of UK based vessel fishing in the TS but landing to UK ports. Does the responsibility lie with the receiving port or the jurisdiction in which the fishing takes place?

The Fair Access Objective is appropriate although it should be noted that it is the opinion of the MFPO that 'fishing opportunities are distributed equitable' does not apply within the Territorial Sea or the wider Irish Sea area (Area 7a). Manx vessels are at a distinct disadvantage compared to UK vessels in that Manx vessels do not have access to quota stocks that are commercially fished in the TS by UK vessels. Even with the non-sector quota pool there is not an equitable distribution of quota as the Isle of Man non-sector does not have the same monthly quota limits as the UK non-sector.

The Manx National Benefit Objective states that fishing boats undertaking fishing activity within the TS will:-

- a) Bring direct socio-economic benefits to the Manx economy; and/or
- b) Make a proportionate contribution to the cost-recovery of the services provided by the Departments Sea Division.

Since Brexit, the various devolved administrations have tightened up and increased the economic link that needs to be met as one of the conditions for fishing in UK waters. It is appropriate that the Isle of Man does the same, to ensure that any fishing activity which takes place in the TS and which targets a Manx public resource provides a benefit to the islands economy.

The issue the MFPO has with this objective is not the overriding principle but the concern that the Manx fishing community will still not benefit due to a continued lack of fishing opportunities in the TS. For the Manx fishing industry, if UK boats are to demonstrate an economic link, or offset that by a contribution to the Manx economy, then this should be in the form of providing quota to the MFPO.

This would then create fishing opportunities for the Manx fleet. This would then result in an increased contribution to Manx GDP particularly if the catch was processed in the Isle of Man. It would create a further export product and also help to increase the workforce.

For example, UK vessels fishing for Nephrops in the TS, should either land the product on the Isle of Man, (not possible at present due to a lack of processing facilities on island for this species) or donate a percentage of their quota to the MFPO. This would create a new income stream and potential fishery for Manx vessels. Alternatively, as the 'new' fishery is being created in the Isle of Man, the donated quota, if not wholly used while the new fishery is being developed, could be leased back to the UK boats, with the extra funding used to create a 'modern resilient fleet.'

The MFPO is concerned, with the two conditions as stated above, that this could just become an income stream for the Isle of Man government but not provide any benefit to the Manx fishing community. Any funds created from this objective would go straight into the overall Treasury pot with no benefit to the sector that is missing out on fishing opportunities. The MFPO is not sure how this objective, in its current form, assists the Manx fishing industry.

The Net-Zero Objective is all part of moving toward a greener economy.

“the adverse effect of fishing activities on the Islands carbon stores are minimised where possible”.

The Manx fishing community has already contributed hugely to this by being a key part of creating the Manx Nature Reserves network around the Isle of Man. This has been recognised by DEFA but perhaps not by the wider Isle of Man government. The farming community has access to various grant schemes to provide support for carbon initiatives – the fishing industry does not and has always been the 'poor cousin' in respect of funding initiatives.

The fishing industry is already a low-carbon activity compared to many primary producers and with the management measures that have been introduced as a result of co-management of the non-quota fisheries, catch rates in the main King scallop fishery have increased. With a catch limit in place this means that there is less carbon output and reduced seabed interaction. Already a difference is being seen due to the LTMP for King scallops.

If we are being asked to further minimise and mitigate the carbon emissions, then there needs to be a huge increase in the available funding to the Manx fishing industry. A lack of investment over many years, both in terms of ever reducing government support and lowering of income streams to the Manx fleet has resulted in an ageing and, in some cases, a poorly maintained fleet. For carbon emissions to be reduced requires a complete change of mindset.

The Displacement Objective is one that has only recently been recognised but very little has been done to assist the industry. Displacement can arise from:-

- a) domestic or UK fisheries management measures
- b) other marine users or marine area designations

While this is acknowledged in the IOMFS, there is little evidence that steps have been taken in the past to mitigate against this. It does need to be treated seriously and not just be a recognition of the impacts. DEFA and the Manx fishing industry have made massive changes to the way that fishing is undertaken in the TS. As a result of this, seabed interaction has been reduced and key ecological features have been protected within the Manx Nature Reserves which were established in 2016. This resulted in a loss of some historical fishing grounds and this has only recently been offset, through the King scallop LTMP, by a reduction in the number of authorised vessels. If there is a continual spatial squeeze then the gains will soon be lost as boats are displaced into ever decreasing areas. The fishing industry (provided it is responsible and sustainable) needs to be recognised as an equally valid user of the marine space. It is hoped that the IOMFS is a major step forward in promoting this.

MSSAC

The Isle of Man Fisheries Objectives provide a basis on which the IOMFS can be measured and delivered. The Bycatch Objective is a concern and is one aspect of Manx fisheries that must be devolved so we can make our own decisions on how this should be handled. In the initial stages of the UK Discard Ban, processors were approached to provide the solution to the bycatch issues. The problem for an island based fishing community are that costs of meeting the demands of the Discard Ban would have been prohibitive. Those extra costs would have had to be passed onto the vessels who already were under severe economic pressure. For the Isle of Man, accurate recording of bycatch and introduction of an Avoidance App's for key species of bycatch could be the best approach.

The Fair Access Objective is agreed as it is vital for some of our larger boats that they have access to UK waters where they fish for King scallops off the west coast of Scotland and east coast of Northern Ireland and for queen scallops in the wider Irish Sea, outside the Territorial sea. There is also a limited amount of Nephrops fishing off the English coast and towards Northern Ireland. These are a vital part of the overall income for Manx boats and also reduce the pressure on our own grounds and our managed non-quota fisheries..

It must be added that the Fair Access needs to work in other ways. Manx vessels need equal access to all quota fisheries, especially those that exist in our own Territorial Sea.

The Manx National Objective is a concern. The MSSAC agrees with the principle of needing to be able to demonstrate an economic link but it needs to be of benefit to the Manx fishing community and not just go directly into the Manx Treasury. This could take the form of quota donation or a fund being developed whereby, should the economic link be a monetary one, the 'donation' would be available to invest in the Manx fishing industry. This would then have a multiplier effect and increase our contribution to GDP and also the workforce.

The Displacement Objective highlights an issue that has not been fully recognised in the past. The IOMFS is being introduced at the right time with marine spatial squeeze being one of the main issues facing our sector.

Net-Zero Objective - one of the quickest ways to reduce our carbon footprint would be to invest in storage and long-term freezer facilities on the island. It is impractical to continue with the process of landing catch in Manx waters and then shipping this product to the UK before it is then returned to the Isle of Man for processing. This product is then sent to market in Europe meaning that it crosses the Irish Sea three times. The cost implications are huge, there is an increased carbon footprint, and this challenges the competitiveness of Manx products in the European market. This also reduces the first sale price that can be paid to Manx vessels. Investment in such facilities on-island would see an immediate and measurable return.

Geoffrey Comber

Broadly in agreement.

Shayne Forrester

Sustainable fish stocks are of greater importance to fishermen whom depend on catch for their livelihood than they are to scientist or any other.

MWT

Generally, MWT are satisfied with the Objectives. The ecosystem objective references Good Environmental Status (GES) as defined in the Manx Marine Environmental Strategy. As MMES has yet to be published some indication of the scope of GES is needed in the Fisheries Statement, for

example it is not clear if marine biodiversity is included in GES. Reference should possibly be made to actions within the IOM Biodiversity Strategy.

In the Bycatch Objective, it is not clear what 'catches' in part b refers to. In addition, how will DEFA define excessive disposal costs and why do limits on technical mitigations determine whether those fish will be landed or not?

IOM Friends of the Earth

Largely sensible and well argued, but the ecosystem objective and biodiversity strategy can be hindered by bottom dredging as in 1 above.

ANON

Section 4.7 - better support for a smaller fleet would also be better for preserving biodiversity and stocks.

ANON

Strong support of bioeconomic objective, ecosystem objective, evidence objective, bycatch objective,

Support of fair access objective, manx national benefit objective

Precautionary objective should include an approach to add a 'cautionary deduction' to any maximal sustainable yield.

Strong support for Net Zero objective but dredging should be severely restricted and additionally be linked to numerical carbon emissions reductions targets per unit of fishing effort.

ANON

I think fishing on a commercial level is unsustainable and should cease.

ANON

There should be an Objective outlining a firm commitment to tackling the twin Climate and Ecological Emergencies, including to designate a minimum of 30% of our territorial sea as fully protected and managed Marine Nature Reserves under the Wildlife Act 1990 by 2030, to cover the full suite of Manx marine habitats, in line with our international commitment and mandate under the Convention for Biological Diversity.

What are your views on the proposed 12-point action plan? - Q3

MFPO

The aspirations, principles and objectives of the IOMFS are largely the same as the Manx fishing industry. The 12-point action plan summarises this well. The MFPO will comment on each of these but is in agreement with all.

- 1) It is vital that we increase our Food Security, and the Manx fishing industry wants to be part of that. As present, over 99% of our product is exported which some will question does not help with Food Security. This depends on whether you are looking at a regional or just an island approach to food security. The other aspect is that the landed catch from the Manx fishing industry could be diverted just to the Manx food sector if it were needed in an emergency. The key aspect here is to establish increased fishing opportunities within the Territorial Sea (and wider Irish Sea area) for Manx vessels, so that we can diversify into those species found within our waters. The only way to do this is to have access to far more quota than is currently available to the Manx fleet and then to invest in the boats so they can target those species. In addition, the factories will need investment in infrastructure, particularly short and long-term freezer and storage facilities, so that the product can be processed and stored on-island. This will have the benefits of greatly reducing overall costs to the processors and will have the benefits of adding value to the product.
- 2) It is vital that we have a good relationship with the UK in all fisheries matters, but we must also be recognised as independent and autonomous. Fisheries powers need to be devolved to the Isle of Man just as they are with other administrations.
- 3) Increased quota and access to new fisheries is key to the future prosperity of the Manx fishing industry. At present we rely totally on fishing for our well managed non-quota species within the TS although some of the larger vessels fish off the west coast of Scotland for scallops. The weakness of having access to only a limited number of fisheries is that the species we fish for are part of wider populations, some of which are not managed as well as within the TS. There are risks of overfishing in the Irish Sea which would have an impact on the level of recruits into the local stocks. In this situation even well managed fisheries with appropriate effort levels would suffer. It is therefore vital that the Manx fleet can diversify into other fisheries. It is not right that UK vessels can target species within the TS but Manx vessels cannot.
- 4) Economic link is a vital component of modern fishing and is used in UK fisheries to protect public resources. There is no reason why that cannot be introduced here. The key point for the Manx fishing industry is that we would wish to see a benefit from this policy. For us, it does not help us if any income from this policy goes straight into the Manx Treasury. This would not help the local industry and certainly would not create fishing opportunities. So, if Action Point 3 is to be met then Action Point 4 needs to reflect this.
- 5) It is vital that we all understand the full economic status of the Manx fishing industry from the smallest Manx boat to the largest processor. In that way policies can be adapted to help the fishing industry and to increase our contribution to Manx GDP. The recent Seafish review of the economics of the Manx fishing industry is a step in the right direction.
- 6) Recently, there have been positive steps made to improve training and career pathways for the fishing industry, training them to a standard that would allow them to skipper a vessel and/or to go into the merchant sector. There are also potential opportunities with the offshore wind and gas sectors in providing guard duty and work-boats. At present, we are behind the UK in the provision

and support for training. The MFPO and RNLI have been pushing for many years for the training requirements to be mandatory on the IOM. Despite many years of promoting this idea the IOM Ships Registry still only 'advises' that training should be undertaken. There needs to be a definite move towards a safer industry with excellent training and potential career pathways and increased funding streams.

- 7) In protecting additional areas, where is the mitigation and support to the fishing industry? As has been stated earlier in this response, recognition that protecting more areas has an impact on the fishing industry is the first step. Doing something positive about this to help the fishing industry overcome potential loss of fishing ground is another step that has not been taken to date. Protection of certain areas may help to create a brood-stock population for key commercial species within that area,. However, any benefits to the fishing community may be lost by having a reduced fishing area, which in turn increases fishing intensity. It should also be recognised that areas currently protected from fishing could allow limited fishing opportunities. Not all areas of each of the MNR's has a key ecological feature. The best example of this is Ramsey Bay which allows a limited fishery at a key time of the year but the ecosystem is still protected. This is one way to offset the loss of further areas.
- 8) Long Term Management Plans are a vital part of fisheries management and the work carried out by DEFA and the MFPO was key in developing the recent LTMP for King scallops in the TS. To ensure fishing is appropriate and sustainable within the TS there needs to be a LTMP for all commercially fished species and not just the ones that the Manx fleet targets.
- 9) Co-management between government and industry is a vital component of creating sustainable fisheries within the TS. A scientific approach backed with investment in surveys provides the background on which decisions can be made.
- 10) Spatial squeeze will become an increasing issue for all marine users. Access to fishing grounds is fundamental to the viability of the Manx fishing industry.
- 11) Compliance and accountability must be robust and future proof. This requires both government and industry input.
- 12) The knowledge provided by Bangor University has been the background of fisheries management. What is especially encouraging is the fact that we are now fortunate to have 'commercial scientists', both in Bangor and within the Manx fishing sector, who appreciate both the scientific background and the socio-economic needs of the Manx fishing industry.

The main point that the MFPO feels has been left out of this 12-point action plan is one referred to in Section 4 under 'Support for the Sector'. For the Manx industry to succeed there requires access to fishing opportunities but also funding or grant assistance to be able to participate in the fishery and to process the catch on-island. This creates the best opportunity to increase our contribution to GDP. Already with the King scallop LTMP it can be seen that a higher percentage of the overall landings are being processed on island. This is real and quantifiable progress. This is mainly due to improved management regimes resulting from the King scallop LTMP. This shows that in the established fisheries it is not necessarily about extra funding but can be about creating a more sustainable fishery. With new fisheries there would need to be investment in all aspects from the boats through to the processors and to marketing of the product.

Other aspects such as investment in infrastructure on island, in terms of increased storage and freezer space, and assistance with shipment costs on and off island for primary producers perhaps should be part of an action plan.

MSSAC

The MSSAC will answer each point in turn.

- 1) We must invest in Food Security both in terms of regional and national (Manx). Access to all quota fisheries that exist in the Territorial Sea is a vital part of this. It is patently unfair that we have to watch UK vessels fishing for key quota stocks within our own Territorial Sea and yet we cannot access those same stocks. One simple example, is we are surrounded by the marine environment, have a reasonably sized fishing fleet but have to import bait for our potting industry. This is an easy gain for the local industry.
- 2) We must be recognised as an independent and autonomous decision making body with devolved powers.
- 3) 3. Access to quota for all commercially fished species in the Territorial Sea is vital to our future and to allow diversification. This will help the sustainability of the non -quota fisheries that we can currently access.
- 4) Demonstration of an economic link to the Isle of Man by UK vessels that fish in our waters for the non-quota species will ensure more product is landed and processed on island. For the quota species that we do not currently have access to or can process on-island, quota donation would be an appropriate method of demonstrating an economic link. It should be noted that Manx vessels that fish in Scotland land over 90% of the caught product to Scottish processors. We also buy fuel and supplies from the local ports. Our fleet certainly meets required economic links when fishing in other waters.
- 5) The recent Seafish analysis of the Manx fleet is the start of this process. A better understanding of the economics will lead to more appropriate management.
- 6) Training and promotion of the fishing industry is key to our future. Crewing has been a major issue in recent years. We are also operating with a skeleton crew on most vessels. Increasing the income streams will increase employment prospects and our workforce will quickly grow. The newcomers (and old-timers!) need the correct training and qualifications.
- 7) An ecosystem approach is important as our industry relies on a good marine environment. Displacement effects do, however, need to be recognised and allowed for.
- 8) Long Term Management Plans have been proved to be effective - the King scallop LTMP has had immediate and positive returns. But it does need to be for all species fished in Manx waters even if there is currently limited access to most of these fisheries for Manx vessels. Each fishery will effect the other fisheries so there needs to be LTMP's in place for all.
- 9) It has been clearly demonstrated in recent years that co-management is key.
- 10) Spatial squeeze is a real concern as the gains of good management could be lost if fishing pressure is concentrated on ever reducing areas.
- 11) Accountability , compliance and confidence in our products will be paramount going forward and will help with our competitiveness and marketing.
- 12) Evidence based fisheries should not just rely on scientists but also the experts within our industry.

Geoffrey Comber

Broadly in agreement.

Shayne Forrester

Just more of the same.

MWT

Action point 7 relates to delivery of an ecosystem approach to management, MWT welcomes this approach. There is reference to 'additional protections in areas that are integral components of the marine food web and wider marine ecosystem,' but protection may be needed for rare species that would not necessarily be an important component of the food web or support the wider ecosystem.

IOM Friends of the Earth

Largely agree but action point 4 'We will take action to increase the economic benefits to the Island's economy as a result of fishing activity in the Isle of Man territorial sea' must have a rider that it is subject to environmental sustainability.

ANON

Support.

ANON

No 7 is key to protecting the marine environment and should be number one.

But the wording of No 7 does not match the urgency of the need to protect the marine biosphere. We should stop dredging up the seabed.

ANON

Rubbish.

ANON

There should be an action outlining a firm commitment to tackling the twin Climate and Ecological Emergencies, including to designate a minimum of 30% of our territorial sea as fully protected and managed Marine Nature Reserves under the Wildlife Act 1990 by 2030, to cover the full suite of Manx marine habitats, in line with our international commitment and mandate under the Convention for Biological Diversity.

What are your views on the proposals for developing Long-term Management Plans? - Q4

MFPO

During the development process for the LTMP for King Scallops, as part of the initial stages, the MFPO produced a discussion paper on the fishery. This concentrated on the overall economic aspects of the fishery over the past 10 years, the value of landings, and percentage of landings that came into the island, how management changes, in terms of catch limits and areas that could be fished, had affected income streams and impacted individual vessels. The value of this document was that it provided all parties with an alternative background to the fishery. Before that, management was all based on the science of the fishery with no real thought of the impact that what may seem to be a simple management change could have on the local fleet.

The subsequent process of developing the LTMP for King scallops provided opportunities for a greater understanding of the complexities of the fishery both from a stock and a socio-economic point of view. This is the real value of a LTMP. It creates an environment for greater understanding and increased co-management.

It is vital that for all commercially fished species in the Territorial Sea there is a LTMP in the near future. This should include those species not currently targeted by the Manx fleet due to lack of quota. While the LTMP for King scallop can act as a template for developing other LTMP's it must be noted that each fishery is different and will require alternative management approaches. For the King scallop fishery it was mainly about matching potential effort (in terms of setting a maximum number of authorised vessels) to the available resource. The King scallop fishery is the main source of income for Manx boats and so had to be considered in this way.

For other fisheries, which form a lesser proportion of overall income, reducing the number of boats may not be the main criteria that ensures boats are profitable. They may have to be considered alongside other fisheries with management adjusted accordingly. The key management tool for each of these fisheries will be to have a decision making board which is made up of all stakeholders – scientists, fishermen and government. There also needs to be a rapid decision-making process that can adapt to changing circumstances throughout the length of the fishery. In this way, fisheries can be both sustainable and of socio-economic value.

MSSAC

These have been stated in other parts of this response. The value of a LTMP for a fishery has been demonstrated with the King scallop LTMP. This has had an immediate impact which has benefitted both Manx and UK vessels that are authorised to fish. Each LTMP will be different and with the smaller scale fisheries they may need to be linked as a decision for one fishery may have an impact on another. There does need to be a LTMP for all commercially fished species in the Territorial Sea. Some will be priority fisheries but to be fully sustainable there does need to be one for each fishery.

Geoffrey Comber

Again, broadly in agreement. But care must be exercised for too many conflicting inputs can result in lack of or tardiness in decision making. The direct input of the catching side is important as is that of the processing side, hopefully to align with long term intentions.

Is there a long term for the future if large parts of our fishing grounds are lost to wind turbines and gas extraction with totally unknown effects on fish stocks?

We are also vulnerable because of our almost total reliance on scallop/queen scallop and crab/lobster fisheries. Some diversification would help but honestly white fish and herring exploitation nowadays means state-of-the-art vessels which, to be economically viable would have to land their catches and be more or less based at UK ports.

Shayne Forrester

Throughout Britain the industry is dying, not because of a decline in fish stocks but because of the decline in potential earnings.

In my view a sustainable industry would call for a Government guarantee of minimum wage on a weekly basis (rather than calculated annually). Fishing is a 24/7 job even when weather and/or rules prevent workers from earning.

MWT

Intervention may be required between the LTMP review periods to respond to changing ecological and/or socioeconomic circumstances.

Section 5.8 suggests DEFA is ahead of its UK partners in terms of the development of management plans for sustainable harvesting of key commercial species. This will benefit the marine environment as well as local fisheries. LTMPs have not been considered for some species that are commercially fished in Manx waters but are fished primarily by boats from other jurisdictions. This leaves conservation of these species, and the associated ecological impacts of fishing effort in Manx waters to the decisions of various UK Fisheries Authorities. To ensure these fisheries are managed in a way that is aligned to Manx Fisheries Statement objectives. It would be beneficial for DEFA to develop their own LTMPs for these species, taking into account wider ecosystem effects and possible future Manx fisheries.

IOM Friends of the Earth

Good in principle to have long term planning but only four species/categories have target dates for implementation/review and these no date beyond 2027, all other identified species at the mercy of initiatives reliant on other jurisdictions. Is this because of lack of resource, if so there must be proposals to remedy the shortfall.

ANON

Full support.

ANON

There should be a LTMP for every species fished. Bycatch damage should be included.

ANON

Stop raping the seas.

ANON

No-response

Are there any other considerations that you think should be included in the Isle of Man Fisheries Statement? - Q5

MFPO

Section 4 of the IOMFS, which concentrates on the delivery of the Fisheries Statement, provides a background to how the Fisheries Statement will be delivered.

There is a statement:-

'Fish and shellfish are a renewable resource, which can provide long term benefits if they are harvested sustainably. It is our responsibility to work with and support stakeholders to ensure that harvests are biologically, environmentally and economically sustainable.'

This is also the responsibility of the industry that depends on it and that is why co-management is such a key aspect. Science and collection and collation of evidence, we have learnt, is all stakeholders' responsibilities. It is not just scientists that collect the data. Often industry is best placed to collect this and every fishing trip is potentially a research platform. If the correct reporting procedures are in place this can be a simple and quick procedure which becomes part of everyday fishing.

REM cameras on board all fishing vessels should become the norm. This obviously requires investment from government but will save costs in the long term and provide other stakeholders with the assurance that fishing is being carried out according to management and sustainable principles. It could also reduce overall monitoring and enforcement costs.

The delivery of the Fisheries Statement, although based within the Territorial Sea, must take into account management of the devolved administrations. In turn the UK needs to recognise, perhaps for the first time, that the Isle of Man is an equal partner. This has not been the case with previous Fisheries Management Agreements and with regard to distribution of quota the Isle of Man is still largely unrecognised. Why, when in 2023 there is an additional 30,000 tonnes of quota available, is the Isle of Man likely to receive only minimal amounts which do not reflect our zonal attachment nor the size of our Territorial Sea.

As the Fisheries Statement declares – the Isle of Man must enjoy the same level of decision making as the devolved administrations and be seen as an independent and autonomous decision making body with control over the Territorial Sea and the species that exist within that zone.

Co-management of the various fisheries must continue within the Isle of Man. This will be especially important if we do have increased fishing opportunities through access to commercial quantities of quota, so the MFPO fully supports the statement: -

'We are committed to co-management with stakeholders that depend on the Island's Territorial sea.'

The Manx fishing industry commits to the formation of the Manx Seafood Sector Advisory Committee which will be the main industry advisory body to the government.

Support for the fishing sector is key to the future. The current grant scheme (AFGS) does need an overhaul so that it can be fully utilised and can target the areas that need urgent funding.

It is noted that 'the new Grant Scheme will expand the scope of support to focus on strategic outcomes' but it also needs to be recognised that the current level of support is simply too small to have any significant impact. On a per vessel basis, it is currently about 10% of the direct support

scheme that is available in the UK. If you exclude the amount set aside specifically for training on the Isle of Man (£12,000 for the whole industry) then the remaining £30,000 is equivalent to about 7% of the level of UK funding. This does not include extra UK initiatives such as local support schemes to improve facilities and infrastructure at ports and processing yards as well as a large training fund to improve safety at sea.

Fishing has been poorly supported on the Isle of Man over many years especially compared to other local primary producing industries. The advantage with an increase in funding for the Manx fishing industry is that support can be measured against the eight listed performance indicators. A lack of available and accessible funding over many years will mean that any new investment will have the capacity to make a real difference and show a quick and measurable return.

MSSAC

Investment, both short and long term, will be key to the Manx fishing and processing sectors. With new challenges affecting all economies, money may be in short supply and any investment will need to be carefully targeted. However, with the fishing industry, it will be possible to demonstrate an immediate and positive impact which shows real returns in terms of employment growth, improved income streams and increased export potential. This will all help to grow our contribution to the Manx GDP.

Geoffrey Comber

It should be continually borne in mind that flexibility should be paramount. Dealing with a natural resource the conditions can change rapidly and reactions must be able to do likewise. The EU CFP meant well but decision making was so sclerotic that necessary measures were being introduced two years later, long after Nature had changed the parameters. Two examples: One morning I had to dump around 200 boxes of perfectly saleable haddock because scientific advice was that this species was scarce in Area 7 and my quota was 4 boxes per month. Other boats were at the time also having to dump large quantities, the majority of which were necessarily dead..... When Auto liners moved into the area they very rapidly reduced spurdog numbers which resulted in a ban on landings. However this species speedily returned in quantity to the detriment of herring etc but the ban remains in force.

Shayne Forrester

I object to the suggestion that distribution of permits within the 3 mile is fair and even.

It would be blatantly apparent were the information to be shared with the public that the lion share of these permits are in the hands of well-placed individuals who correspondingly happen to own the largest, heaviest, most powerful and expensive to buy creel boats permitted to fish inside the 3 mile zone. The public might be interested to note that these same vessels also have a criminal history of illegal fishing.

It seems to have been overlooked that "inshore vessels" do not facilitate offshore fishing given they have no sleeping/cooking arrangements for crew.

Further to that they are lighter built and more susceptible to weather conditions.

To push such boats offshore in order to make a living is to invite tragedy, whilst vessels far less susceptible to the vagaries of weather enjoy safer waters closer to land.

MWT

Marine litter from fishing vessels is considered a problem by some and is not addressed here. Could this tie in with other Government Strategies?

Could any lessons learnt from the Agri-environmental scheme be applied to the Fishing Industry, recognising fishers as custodians of the marine environment and helping to facilitate more MNRs in our 3-12nm territory?

Is biological/ecological evidence as referenced on page 20 currently as strong as suggested or does it rely on historic data? There is good current fisheries data for some species but not all and wider indicators of ecosystem health and biodiversity may be limited.

IOM Friends of the Earth

There is no consideration of fuel usage and carbon emissions from the fleet or a vision of possible future transitions to less polluting propulsion methods.

Is there a sufficiently robust system for back tracking discarded gear to the owner when it washes up on our shores?

ANON

Ban fishing.

ANON

No.

ANON

I would have liked to see a specific commitment to funding stronger fisheries protection.

ANON

There should be a more emphasis concerning a firm commitment to tackling the twin Climate and Ecological Emergencies, including to designate a minimum of 30% of our territorial sea as fully protected and managed Marine Nature Reserves under the Wildlife Act 1990 by 2030, to cover the full suite of Manx marine habitats, in line with our international commitment and mandate under the Convention for Biological Diversity.