

12 September 2018

Fisheries White Paper Consultation team
Department for Environment, Food & Rural Affairs
First Floor,
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Dear Fisheries White Paper Consultation Team

I write on behalf of the Royal Society of Biology (RSB). The RSB welcomes Defra's consultation on the *Fisheries White Paper: sustainable fisheries for future generations (FWP)*¹. Our recent response to the *Defra consultation on Environment Principles and Governance after EU Exit² (EPG)*, among our other recent relevant responses^{3,4}, is very pertinent to this Defra consultation and as such, I write to highlight several elements of our response where our recommendations bear relevance to the FWP. I ask that you consider these as part of the FWP consultation phase, please.

The Secretary of State, in his foreword to the FWP, sets out the ambition "to promote a more competitive, profitable and sustainable fishing industry across the whole of the UK, and setting a gold standard for *sustainable fishing* across the world". We welcome this goal, but would advise it needs further definition within the FWP, to include the following:

Time zero

The Government's 25 Year Environment Plan aims to leave the environment *in a better state than we found it*. This plan is referenced in the FWP (pp. 15). As per our response to the EPG (pp. 1), we reiterate that this is "a welcome proposition, however, there must be a clear time parameter from which improvement measures can be quantified - i.e. time zero must be defined".

Sustainable fishing

In our response to the EPG (pp.1) we stated that the "development of a set of Environmental Principles [...] to which the Government would be held accountable, is particularly welcomed. It is paramount that any reference terms are scrupulously defined, and not subject to interpretation that could allow for environmental impacts to be placed secondary to short-term economically favourable policies. While principles themselves should be firmly established [...] there must be available scope within any policy statement that allows for appropriate up-to-date amendments to be made, using widely-informed evidence synthesised from the best contemporary data." In light of this, and in relation to the FWP, it is paramount that the term *sustainable fishing* is scrupulously defined.

The Society notes the recent announcement confirming plans to introduce a wide-ranging Environment Bill⁵. It is unclear, from the FWP, how the Environment Bill, the Fisheries Bill (noted in the Executive summary of the FWP), and the fisheries policy statement, "on how to apply specified sustainability principles and objectives to

¹ <https://www.gov.uk/government/consultations/fisheries-white-paper-sustainable-fisheries-for-future-generations/sustainable-fisheries-for-future-generations-consultation-document>

² https://www.rsb.org.uk/images/RSB_response_Defra_Environmental_Principles_inquiry_submitted.pdf

³ https://www.rsb.org.uk/images/RSB_response_to_Defra_consultation_on_Health_and_Harmony_submitted.pdf

⁴ https://www.rsb.org.uk/images/RSB_response_25_Year_Environment_Plan_inquiry_Submitted.pdf

⁵ <https://deframedia.blog.gov.uk/2018/07/19/prime-minister-announces-environment-bill-which-report-on-recycling-of-supermarket-packaging-and-advice-from-gardeners-world/>

fisheries management” (FWP, Section 1.2) will be integrated. Clarity is required on this front. Clarity is also required on how a) the *environmental principles*, b) the *sustainability principles* and c) the definition of *sustainable fishing* will relate to one another. As highlighted in our response to the EPG (pp.1), “to carry sufficient weight, the *environmental principles* laid out in the proposed [Environment] bill will require the backing of quantifiable environmental standards [...] which if breached, provide sufficient evidence to hold responsible parties including the Government to account”. Similarly a definition of *sustainable fishing* should be underpinned with metrics that enable progress (or otherwise) to be measured and accounted for.

International targets and an ecosystem approach

In our response to the EPG (pp. 2), we also advised that “the UK currently takes a leading and influential role in setting EU regulation based on the best available scientific knowledge, and should strive to lead by example as an effective world-leader in its environmental approach. Post-Brexit, the UK should aim to remain committed to agreed shared international targets and goals, while taking the opportunity to scrutinise and update its own domestic environmental guidance”. As part of this, our recommendation would also extend to fisheries regulations and guidance.

In our response to the EPG (pp. 9), we note that “Incentives such as the Commonwealth Blue Charter⁶ have acted as a stepping stone towards maintaining a sustainable marine environment⁷ that fares well historically, societally, and economically, keeping in line with the United Nations SDG14⁸. This is key to the Natural Capital⁹ approach and will allow for better protections of the oceans and seas and the continued viability of the wider marine ecosystems pivotal to maintaining our fish stocks”. As such, we very much welcome Defra’s pledge (FWP, Section 1.1) to pursue “an ecosystem approach to fisheries management, which aims for more sustainable management and accounts for, and seeks to minimise, impacts on non-commercial species and the marine environment generally. This involves restoring and maintaining the health of fish stocks and the marine environment which underpins a prosperous fishing industry.”

Public goods

The FWP clearly sets out (Section 1.1) that the government will manage “fisheries – and the wider marine environment – as a shared resource, a public asset held in stewardship for the benefit of all”. Again, we absolutely welcome this strategy. Our response to the EPG also provides the following advice of relevance, (pp.10): “the principle of *public money for public goods* [...] could be beneficial in food chain governance. Additionally, judicious application of the polluter pays principle [...] with an emphasis on an *extended producer responsibility* strategy¹⁰, could provide an effective and fair underpinning for future policymaking. Combined with a greater emphasis on consumer responsibility, this could deliver environmental benefits.” Additionally, it must be noted that (pp.5) “Human health and wellbeing are [also] framed as core public goods under the WHO Health 2020 common framework policy¹¹”.

⁶ Commonwealth Blue Charter. (2018). URL:

http://thecommonwealth.org/sites/default/files/inline/CommonwealthBlueCharter_1.pdf

⁷ House of Commons Library. UKs role in the degradation of the marine environment, Debate pack number DP 2017-225, November 2017. URL: <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CDP-2017-0225#fullreport>

⁸ The United Nations. Report of the Secretary-General, “Progress towards the Sustainable Development Goals”, E/2017/66. URL: http://www.un.org/ga/search/view_doc.asp?symbol=E/2017/66&Lang=E

⁹ <https://www.naturalcapitalinitiative.org.uk/>

¹⁰ *Producer responsibility strategy: financial or physical responsibility of a producer to ensure appropriate treatment/disposal of post-consumer products*

¹¹ World Health Organization – Europe (2015). Report: Health 2020: Agriculture and health through food safety and nutrition. URL: http://www.euro.who.int/_data/assets/pdf_file/0016/324610/Health-2020-Agriculture-and-health-through-food-safety-and-nutrition-en.pdf?ua=1

Interdisciplinary evidence and community consultation

Our response to the EPG also states (pp.2) that “globally, there is an increased need for interdisciplinary research, with applications such as in investigating relationships between the natural environment, and human health and wellbeing [...]. To allow for consistent and effective decision-making on a long-term basis, key evidence gaps and research priorities need to be identified and addressed via cross-sector knowledge channels, including but not limited to bodies and individuals representing academia, industry, and Government”; and (pp.14), “A skilled, well advised and informed, and properly resourced regulator will be an effective driving force for change. An interdisciplinary approach adhering to advice from experts is essential to the integrity of this process. Such expertise should include but not be limited to: environmental managers, ecologists, conservationists, farmers, fisheries and forestry managers, landscape planning and sustainable infrastructure developers (including renewables and transport), health workers, climate scientists, economists, academics and policy-makers”. These needs will also be imperative to meet in order to fulfil the ambitions of the FWP and the 25 Year Environment Plan, and, of course, ongoing consultation and cooperation with fishers (both commercial and recreational) and fisheries and will be an integral part of this process.

Judicious use of limited resources

As we expressed in our response to the Defra consultation on *Health and Harmony: the future for food, farming and the environment in a Green Brexit*¹² “a central aim of decision-making should be to attain peak performance, productivity and efficiency using limited resources and whilst enabling maintenance and improvement of [public], animal, plant and environmental health, and animal welfare¹³, through sustainable management practices”.

Yours sincerely,



Dr Mark Downs CSci FRSB, Chief Executive

The Royal Society of Biology (RSB) is a single unified voice for the life sciences, representing a large membership of individuals, learned societies and other organisations¹⁴. We welcome the opportunity to provide comment on this important matter. We are pleased for this response to be made publicly available. For any queries, please contact the Science Policy Team at Royal Society of Biology, Charles Darwin House, 12 Roger Street, London, WC1N 2JU. Email: policy@rsb.org.uk

¹² https://www.rsb.org.uk/images/RSB_response_to_Defra_consultation_on_Health_and_Harmony_submitted.pdf

¹³ https://www.rsb.org.uk/images/RSB_response_Defra_draft_Animal_Welfare_Sentencing_and_Recognition_of_Sentience_Bill.pdf

¹⁴ <https://www.rsb.org.uk/membership>

