

Summary of responses



Llywodraeth Cymru
Welsh Government



Brexit and our Seas

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1. Introduction

- 1.1 On 1 May 2019, the First Minister and Minister for Environment, Energy and Rural Affairs published the Brexit and Our Seas consultation. The consultation was the first stage in the process of creating a new policy to ensure the Welsh marine environment and fishing fleets can prosper in a post EU world. It sought views on how the Welsh Government should tailor Fisheries Management following the UK's exit from the European Union (EU) and withdrawal from the Common Fisheries Policy (CFP).
- 1.2 The consultation was the start of a conversation aiming to create new policy, management regimes and legislation for Welsh Fisheries. It called for views on:
 - fisheries management
 - sustainable fisheries
 - fishing opportunities
 - shellfish and aquaculture
 - trade
 - growth and innovation
 - fleet sustainability
 - evidence, and
 - funding support.
- 1.3 The consultation document explained that leaving the EU will give Wales the opportunity to set our own fisheries policies, and tailor these policies to the unique needs of the Welsh fishing industry.
- 1.4 It set out the current EU legislation under which the Welsh Government manages fisheries, and the UK and Welsh legislation which will continue to shape policy in the future. In particular, the document emphasised the commitment to the principles of the Well-being of Future Generations (Wales) Act 2015. It reiterated the Welsh Government's commitments to the marine environment as enshrined in the Environment (Wales) Act 2009 and the Marine and Coastal Access Act 2009. These three pieces of legislation will be at the heart of future Welsh policy in this area. The document also committed the Welsh Government to continue to uphold and enforce the same environmental standards to which they are currently held to under the CFP.
- 1.5 Organisations and the public could respond to the consultation through three channels: online, by post and by email. Given the broad range of areas covered, postcards were produced and distributed, to encourage fishers to respond with their views by email if they did not want to complete the full consultation form.

As well as inviting written responses via the channels listed above, five open meetings were arranged in coastal communities across Wales. A meeting was also held with representatives from Wales Environment Link.

2. Overview of consultation responses

- 2.1 A total of 57 responses were submitted to the Brexit and our Seas consultation. One response was a duplicate and was excluded from the analysis. One respondent, the RSPB, sent two discrete responses, one via the form and one a free form response. No blank responses were received. Therefore, 56 substantive responses, from 55 unique respondents, were included in the analysis for this Summary Report.
- 2.2 Responses were submitted via an online form. The option of completing the form offline and returning it by email was also offered, as was returning the form by post. The postal route was not used by any respondent; four respondents emailed a free-form response which did not utilise the consultation response form. This is summarised in Table 1.1.

Table 1.1: Routes of response

Route of response	Number of responses
Form submitted online	30
Form emailed	21
Free form response emailed	4
Post	0

- 2.3 No responses were received in Welsh only. Two submissions were received in both Welsh and English.
- 2.4 Two Fishing Associations sent the same response. Other fishing associations sent very similar responses but tailored to their specific circumstances.
- 2.5 Not all respondents answered all questions. This is summarised in Table 1.2.

Table 1.2: Summary substantive responses to open consultation questions

Consultation Question	*Responses
Q1	43
Q2	43
Q3	43
Q4	44
Q5	33
Q6	36
Q7	38
Q8	34

Consultation Question	*Responses
Q9	31
Q10	32
Q11	38
Q12	34
Q13	29
Q14	35
Q15	40
Q16	37
Q17	35
Q18	33
Q19	35
Q20	35
Q21	30
Q22	33
Q23	37
Q24	37
Q25	34
Q26	33
Q27	35
Q28	36
Q29	29

**No response, 'no comment' and 'n/a' have been counted as non-responses. Thematic responses to more than one question have been counted for each questions indicated in the response.*

2.6 Respondents were not asked to identify their interests or sector, but were asked for their organisation (if any). A breakdown of respondents' responses to this question is given in Table 1.3.

Table 1.3: Type of organisation listed by respondents

Organisation Response Type	Number
None / no response	18
Environmental interests / eNGOs	10
Fishers Associations	6
Private Sector	8
Local Government	3
Vessel Owners / Skippers	3
Angling	2
Trade Unions	1
*Other	4

**British Ports Association, The Crown Estate, PLANED and Menter a Busnes*

2.7 All responses were collated into a central database. Each response was then evaluated against the relevant consultation question to draw out the dominant and alternative views coming through the responses. General responses which did not directly reference the consultation questions have

been analysed and attributed to the relevant question. A more detailed summary of responses can be found in Annex B.

3. Summary of Responses

The Marine Environment: Questions 1 – 3

- 3.1 The first section asked three questions regarding the Marine Environment. Some respondents gave an overall response that covered more than one of the first three questions and these have been included in the analysis for the most relevant questions.
- 3.2 The first question was: **What could the Welsh Government do to support the implementation of the Welsh National Marine Plan (WNMP) once it's adopted?**
- 3.3 43 respondents answered this question, either in isolation or in combination with other questions.
- 3.4 Most of the respondents to this question who gave an opinion on the WNMP were supportive of the implementation of a WNMP.
- 3.5 However, many respondents made reference to the need to integrate the WNMP with other plans and strategies and for the Welsh Government not to act in silo. This was in relation to both the marine environment and in terms of the impact land management has on the marine environment. Some respondents felt that the focus on fisheries to the exclusion of marine considerations in the Brexit and our Seas consultation document showed evidence of silo working, a lack of joined up thinking, and a wasted opportunity to seek wider views on Brexit.
- 3.6 The need for the Welsh Government to develop clear frameworks and guidance on the implementation of the WNMP was raised by some respondents.
- 3.7 Question 2 asked: **How could Wales enhance the health and resilience of the marine ecosystems to further support Welsh coastal communities to thrive?**
- 3.8 There were 43 responses to this question, either in isolation or in combination with other questions.
- 3.9 Environmental organisations noted that healthy and resilient ecosystems are the cornerstones of sustainable rural economies, that Marine Protected Area (MPA) management is a cornerstone of this and that Welsh Government should directly provide principal core funding for MPA site management. An adaptive ecosystem-based approach was advocated by both them and fishing associations as the way to help coastal communities thrive.

- 3.10 One respondent suggested that focusing on inshore fisheries and reducing offshore fishing will enhance local catches and processing, thus creating or improving local markets and boosting communities.
- 3.11 Enforcement was a common theme arising from responses to this question. Some suggestions for areas in need of enforcement were: closed seasons on fish stocks during spawning, size limits, severely limiting or banning gill netting, and limiting or removing access to fisheries, in particular to non-Welsh or non-UK vessels.
- 3.12 Aquaculture was identified by several respondents as a way of enhancing coastal communities. Improving the legislative process for aquaculture farming and providing funding for aspects of aquaculture such as research, farm set-up, training and marketing were all suggested. Seabed and seashore bivalve cultivation was suggested as a priority, as was seaweed.
- 3.13 The importance of fair quotas was raised in several responses. One response advocated either using existing or creating new powers to protect local fishing communities from unfair and environmentally damaging quota systems. Other responses advocated nationalising fishing quotas so they can be handed out according to community need and fish stocks.
- 3.14 Fishing associations and others emphasised the importance of a collaborative approach involving all relevant stakeholders to manage Welsh seas for coastal communities.
- 3.15 Responses from recreational anglers advocated the importance of consulting with them, as they have a depth of experience and detailed records of catches, and their activity is particularly directed towards coastal communities. They noted the importance of recreational anglers to local economies, arguing that they contribute more than commercial fishing. One suggestion was to include provisions to promote and develop sea angling in Wales in the Joint Fisheries Statement.
- 3.16 Question 3 asked: **How could we support practical action for biodiversity gain to help secure marine ecosystem resilience?**
- 3.17 Some respondents felt that embedding the Environment Act's duties, including the Section 6 biodiversity duty, in all future marine legislation and policy would bring resilient ecosystems. But they also felt that there is little evidence that this is happening.
- 3.18 The fishing organisations wanted to see Welsh Government and Natural Resources Wales work more closely with the fishing industry to gather data to assess the status of marine biodiversity and the pressures.
- 3.19 Tackling marine litter through heavy fines was also suggested.

- 3.20 Environmental Organisations criticised the Marine Protection Area (MPA) Framework and Action Plan as fundamentally flawed because it does not advocate the precautionary principle. They argued that, where data is deficient, Welsh Government should apply the precautionary principle and halt potentially damaging activities, not delay until 'all' evidence is available. While welcoming the action for more involvement from Wales Marine Action and Advisory Group (WMAAG), they noted that stakeholders are excluded from commenting on the action plan, thus excluding the knowledge and experience available in WMAAG and potentially not following the ways of working from the Well-being of Future Generations Act.

Sustainable Fisheries: Questions 4 – 6

- 3.21 The second section asked questions about sustainable management of fisheries. This section includes a summary of the direct responses to these questions and more general responses on this theme.
- 3.22 Question 4 asked: **What initiatives could be used to improve the long term sustainability of fisheries in Wales?**
- 3.23 Many respondents agreed that fishing to sustainable levels is essential for the future of fisheries and the marine environment in Wales. Fisheries organisations responded that a strategic approach which delivers adaptive co-management would lead to healthy fish stocks and a vibrant fishing fleet. This approach would be underpinned by elements such as stock assessments, fleet and stock monitoring systems and the use of SMART technology and data handling systems.
- 3.24 Environmental organisations also agreed that fishing must take place at sustainable levels, and emphasised the importance of using available scientific advice to ensure fish stock are maintained above levels of Maximum Sustainable Yield (MSY). Some organisations were concerned that the Welsh Government is exploring alternatives to MSY, as MSY is the approach used by almost all advanced fisheries regimes globally.
- 3.25 The fishing associations agreed with the Welsh Government's suggestion of a 'zonal attachment' quota allocation.
- 3.26 Other suggestions included putting in place measures to establish no-take zones and ban landing of berried lobsters.
- 3.27 The elimination of bycatch, including marine mammals and seabirds, was highlighted as vital for sustainable fisheries by Wales Environment Link, who advocated working with other UK administrations to develop effective mitigation measures, data collection, reporting and monitoring, with the ultimate aim of reducing bycatch to zero.

- 3.28 Question 5 asked: **How could Welsh Government achieve greater administrative flexibility and responsiveness in fisheries management?**
- 3.29 Sufficient data was recognised by many respondents as being vital for flexible and responsive fisheries management. Organisations therefore welcomed the proposal in the recent Welsh Government consultation to install a Vessel Monitoring System for all boats under 12m in Welsh waters.
- 3.30 Ensuring that the competence for primary fisheries legislation within the Welsh exclusive economic zone (EEZ) rests with the Welsh Legislature was also raised as a necessity, in order to enable the administrative flexibility to manage the dynamic marine environment. It was noted that this is included in the UK Fisheries Bill but, if that fails, consideration needs to be given to a Welsh Fisheries Bill with the appropriate powers.
- 3.31 Question 6 asked: **How should adaptive management be introduced for a wider range of species, if so which would be the priority?**
- 3.32 Fishing associations responded that adaptive management should draw on fishers' knowledge, meaning that regional and local management can adapt quickly. The possible use of permits, initially focusing not on total allowable catch (TAC) species but rather on non-TAC species such as scallops and whelks was also suggested. The WFA/CPC suggested prioritising fisheries for adaptive management, focusing on:
- fisheries prone to boom and bust exploitation
 - the economic importance of a fishery to the Welsh fleet and coastal communities, and
 - the status of a fish stock, for example if there is evidence to suggest the level of exploitation is above MSY
- 3.33 Environmental organisations also pointed out that Wales is likely to become responsible for the management of a much greater area of sea. This includes areas where stocks are in the poorest state such as Irish Sea cod and Irish Sea whiting. These should be the priority for new management measures.
- 3.34 Several species were recommended by respondents as being in urgent need of management.

Fishing opportunities: Questions 7 – 10

- 3.35 Question 7 asked: **How might you see fish stocks being managed for the wider benefit of the people of Wales and their coastal communities?**

- 3.36 There was general agreement from respondents that fishing opportunities in Welsh waters within the 12nm zone be protected for the smaller, inshore fleet. Many responses also stated that no EU boats should be allowed to fish within British waters.
- 3.37 Fishing Associations argued that investment in the fishing fleet would also bring additional economic growth and jobs through improvements in infrastructure, logistics, processing and fish auctions.
- 3.38 Environmental organisations argued that any additional quota should be allocated in accordance with the Well-being of Future Generations Act and to encourage sustainable fishing practices. Any additional opportunities should also comply with MSY.
- 3.39 Question 8 asked: **What mechanisms could you seek to help the Welsh fleet adapt to make the most of any new fishing opportunity?**
- 3.40 An individual response from a fisher stated that yearly or quarterly quota allocation would help fishers to catch their quota allocation at the time when the fish are available rather than monthly quota which may be wasted if fish aren't in the water.
- 3.41 Fishing associations and individual fishers also stated that help would be needed for fishers to update or invest in new vessels capable of fishing beyond 12nm.
- 3.42 Port infrastructure was also listed as something that would need support. This includes things such as ice plants, cold storage facilities and refrigerated vans to drive the catch to markets.
- 3.43 Question 9 asked: **How could the industry and coastal communities generate sustainable funding or financing opportunities and where might these opportunities arise from?**
- 3.44 The fishing associations agreed with Welsh Government's suggestion that, where Welsh capacity is limited, leasing fishing opportunities in the short term could generate funding to support investment in the Welsh fishing industry. This investment could be used to invest in fleet capacity, improvements to ports and harbours and improved logistics to markets and transportation.
- 3.45 Question 10 asked: **What do you think could be done to manage 'choke' species?**
- 3.46 Fishing associations responded that increasing the overall Welsh allocation of quota would give the flexibility to manage potential choke species flexibly.

- 3.47 It was felt by some respondents that VMS and Remote Electronic Monitoring would help manage 'choke' species more effectively.
- 3.48 Using quota to manage choke species was also included in responses. This included a risk pool approach of collectively managing quotas to help coastal communities work together. Other respondents listed using additional quota as an incentive to improve selectivity in gear and behaviour.
- 3.49 In looking to other models for managing choke species, Norway and Canada were both listed as good examples.

Shellfish and Aquaculture: Questions 11 – 13

- 3.50 Question 11 asked: **Do you agree with proposals to manage shellfish flexibly? Can you provide any example where flexible management would be of benefit?**
- 3.51 There was a mixed response on whether or not respondents agreed with proposals to manage shellfish flexibly. One respondent said that shellfish fisheries and shellfish aquaculture are not the same and therefore can't be managed in the same way.
- 3.52 In terms of shellfisheries, the fishing associations advocate real time monitoring, together with flexible and adaptive management of shellfish stocks that span the 12nm boundary would provide more consistent and effective regulation.
- 3.53 From an aquaculture perspective, some respondents did not support the replacement of the Sea Fisheries (Shellfish) Act 1967. But others felt that the process is overly protracted and uncertain. The granting of Several Orders is often delayed due to Welsh Government resources, but was still felt to be the appropriate method for aquaculture licensing, and any changes to the legislation would need to be thoroughly reviewed.
- 3.54 Question 12 asked: **Do you agree with our proposals to introduce a new management regime for aquaculture?**
- 3.55 Of the 34 responses to this question, three did not agree with these proposals, and a further 14 stated they didn't know if they agreed, either without giving a reason or stating that not enough information was given to know whether they agreed or not.
- 3.56 One respondent said that they support part of the proposals but not others. They did not support replacing the Sea Fisheries (Shellfish) Act 1967 but would support proposals to develop a new licensing regime for offshore rope systems outside the 0-6nm area. Also, they would support proposals to

improve the management regime for offshore finfish aquaculture and would be keen to work with Welsh Government to develop diversification.

- 3.57 Question 13 asked: **a) How could Wales increase its aquaculture production? b) What role do Welsh businesses and the Welsh Government have in this process?**
- 3.58 One respondent said that there was a need to be ambitious and think big to achieve realistic economic viability. They also said that while small producers are an important part of the industry, there is also a need to achieve a critical production level to generate significant employment and realise the development of processing and other businesses that add value.
- 3.59 Another respondent said that it was the role of business to identify opportunities and Welsh Government's role to facilitate the development of new opportunities, and safeguard existing opportunities.
- 3.60 One respondent also felt that even though the Welsh Government have promoted the development of aquaculture in recent strategies, it has also directly or indirectly obstructed the development of the industry, citing its environmental responsibilities as the justification. To this end, the respondent also said that improved engagement between the Welsh Government and industry was needed.
- 3.61 One respondent said that a new management regime for aquaculture seemed to focus mainly on shellfish, and consideration also needs to be given to developing cultured finfish and for technology based aquaculture and land-based systems for finfish.

Trade: Questions 14 – 16

- 3.62 In this section, many of the responses to questions were included across the whole section to the bullet points below cover the responses to questions 14 – 16 together.
- 3.63 Question 14 asked: **How could market development be encouraged in the future e.g. new markets and new products?**
- 3.64 Question 15 asked: **How could Welsh producers boost UK interest in Welsh seafood produce? Does the Welsh Government have a role to play?**
- 3.65 Question 16 asked: **Could new markets for Welsh seafood, outside the EU be expanded, if so where and how?**

- 3.66 Throughout a number of responses, not only in response to this question, many respondents said there was a need to increase the domestic market for our domestic fish. Promoting Welsh seafood to the general public and to restaurants was mentioned in many responses, as well as putting Welsh fish on school menus. There was a view that domestic seafood such as mussels, scallops and whelk could be made more appealing to consumers, through using ambassadors, chefs and bloggers to champion Welsh seafood.
- 3.67 Alongside the point made in 3.66, another respondent said that the UK currently imports Canadian lobster while exporting our own native lobster, and argued that Welsh Government policy and research should address this so that domestic markets can be supported to sell UK-caught lobster.
- 3.68 A Welsh seafood brand was also seen as vital by many, as was the link to the sustainable brand values work currently being undertaken.
- 3.69 Included in a response to a different question, one respondent said that EU boats are regularly catching fish such as tuna off the Welsh coast as a result of warming seas. The UK have no quota for this species to enable them to be landed and this must change.
- 3.70 Suggested new products included bivalves such as razor and surf clams and developing processed seafood for particular markets.
- 3.71 Although respondents said that there is potential to expand the domestic and UK market for finfish, there is also a difficulty in maintaining a continuous supply. This is compounded by poor transport links to remote coastal ports and landing places which restricts opportunities. Co-operative arrangements in landing fish could help this, although supplies are limited by quota also.
- 3.72 Some respondents said that the Welsh Government should continue to support trade events showcasing Welsh seafood.
- 3.73 Many saw the Far East as a potential new market as a considerable amount of Welsh seafood is already exported to China and South Korea.
- 3.74 Others advocated diversification of existing markets, rather than development of new markets.
- 3.75 Environmental organisations and others noted that many key Welsh stocks are yet to be managed sustainably.

Growth and innovation: Questions 17 – 19

- 3.76 Question 17 asked: **What role could the Welsh Government and others play to enable the industry to expand processing and other economic activities? How should coastal communities be engaged in developing new opportunities?**

- 3.77 Many substantive responses felt that the Welsh Government had a role to play in enabling the industry to expand. Suggestions included supporting the industry through funding schemes to replace the European Maritime and Fisheries Fund (EMFF), attending trade events to promote Welsh seafood, developing infrastructure and domestic markets, and ensuring trade deals are in place with export markets.
- 3.78 However, some respondents were critical of Welsh Government's support of industry expansion in the past. In particular, management of EMFF was criticised as being too complex and cumbersome, and too bureaucratic to respond quickly to innovative industry action.
- 3.79 Some respondents also felt that growth should not be the priority and that an ecosystems-based approach to fisheries was appropriate.
- 3.80 Question 18 asked: **How could the relationship between academia and industry be better improved?**
- 3.81 Most respondents felt that the industry already has a good working relationship with academic institutions. With collaboration already happening on stock assessments, assessing environmental impacts of fishing and monitoring the health of our seas. The Shellfish Centre at the Centre for Applied Marine Science is cited as a good example of this.
- 3.82 Ideas for improvements include increasing communication between academic institutions and the local fleet. Also, a suggestion was made for Welsh Government to assign scientific work to Welsh Universities as opposed to scientific bodies located outside of Wales. Another suggestion was to establish a marine research hub to host all marine research in Wales.
- 3.83 Question 19 asked: **What opportunities are there to grow fishing businesses in Wales, in other activities e.g. tourism, providing services to marine industries and Government?**
- 3.84 Some respondents felt that with well managed fisheries, the industry would be more profitable and would not need to diversify.
- 3.85 The fishing associations, however, felt that there are opportunities including using vessels for marine reporting on, for instance, condition of habitats and spread of invasive non-native species. Tourism was another opportunity and many Welsh fishers already charter their vessels for angling and wildlife trip. They also responded that assisting other marine industries such as the marine renewable sector.

Fleet Sustainability: Questions 20 – 22

- 3.86 Question 20 asked: **How could the Welsh fleet be sustained and enhanced?**

- 3.87 There were 35 responses to this question. Fishing associations agreed that profit margins are low, the workforce is aging and recruitment into the Welsh fishing industry is slow.
- 3.88 Pembrokeshire County Council argued for making the industry more profitable and attractive to new entrants by flexibly managing fisheries over the year, allowing winter fisheries to be exploited while shellfisheries undergo seasonal closures. This would allow year round employment which would attract new entrants.
- 3.89 Several respondents felt that Welsh Government management has not allowed fishers to exploit stocks adequately, and advocated for this to change or new entrants will not enter the sector.
- 3.90 Concentrating on sustainability rather than growth in itself was an emerging theme. Environmental organisations and other respondents noted that the long-term viability of the industry is dependent on the long-term sustainability of fishing stocks. The importance of sustainable fishing guided by MSY was noted. One respondent advocated increasing minimum conservation reference size (MCRS) for whelks to 75 or even 80mm.
- 3.91 Diversification and even, in the long term, full conversion of the fleet to other uses was advocated by some respondents.
- 3.92 Question 21 asked: **How might the fishing industry, aquaculture businesses and coastal communities lever opportunities for sustainable growth from Wales' natural marine resources?**
- 3.93 Several respondents, including fishing associations and environmental organisations, felt that sustainable growth would best be attained by managing fisheries to levels that don't exceed MSY because opportunities for sustainable growth rely on recovery and maintenance of the marine environment. The WMNP was also identified as a key tool for sustainable development.
- 3.94 Others advocated an emphasis on aquaculture. Suggestions included integrating coastal fishery cooperatives with commercial aquaculture, diversification into aquaculture, and making Wales a centre for aquaculture training and production. Some stated that legislative procedures for aquaculture consents were currently a barrier.
- 3.95 Some respondents argued that growth is not a useful goal and sustainability should be the priority.
- 3.96 Question 22 asked: **What could be done to encourage new entrants into the maritime and fishing industry in Wales?**
- 3.97 Profitability was felt to be key to attracting new entrants into the industry.

- 3.98 Support for new entrants with training and purchasing vessels and licenses were also suggested.

Evidence: Questions 23 – 26

- 3.99 Question 23 asked: **What are the priority issues facing the marine environment that should be researched?**
- 3.100 Water quality and pollution was the priority of many respondents to this question. The run off from farming and urban areas was a particular concern.
- 3.101 Many respondents also included invasive non-native species as an issue to research. The impacts of climate change, for instance its impact on fish stocks, sea birds such as kittiwakes and other habitats were also suggested as key areas for research.
- 3.102 Question 24 asked: **What are the priority fisheries species and stocks that should be researched?**
- 3.103 The fishing associations suggested that the priority should be on data deficient stocks, those that are thought to be at risk of over-exploitation and those thought to be in a poor state. They and some other respondents also said those of most commercial importance should also be a priority.
- 3.104 A large number of species were put forward as in need of research. Brown crab was deemed by one respondent to be a species in need of urgent focus. Other suggestions included razor clams, prawns, lobster and bass.
- 3.105 Question 25 asked: **What are the key economic, environmental and social factors that should be explored as part of this research?**
- 3.106 There were 34 responses to this question and responses were varied. The factors listed included how local communities are benefitting and could further benefit from fishing. Also included were factors such as recreational angling and the importance of the marine environment for health and wellbeing.
- 3.107 Question 26 asked: **How can public sector, academic and other fisheries science projects be focussed and joined up to provide the evidence needed to develop and evaluate marine and fisheries policies and management?**
- 3.108 The responses to this question were again mixed, with no overall consensus. The Fishing Associations responses that a scientific hub would help bring research together into one place which would improve communication between researchers. They also welcomed and supported the continuation of Welsh Government working groups such as the Welsh Marine and Fisheries Action Group that bring together all interest groups.

Funding Support: Questions 27 – 29

- 3.109 The final section of the consultation considers funding within the Welsh Fisheries Sector. Following Brexit, funding opportunities from the EU such as the European Marine and Fisheries Funds (EMFF) will eventually come to an end, and the questions arising from this section asked respondents to consider how the sector should be funded in future.
- 3.110 Question 27 asked: **How should any successor to EMFF and other EU funded programmes be targeted in future and on what basis?**
- 3.111 There were 35 responses to this question. Respondents made a wide range of suggestions for targeting of future funding programmes, clustering around several themes. These were: ensuring that any future scheme improved on the perceived shortcomings of EMFF (including accessibility to funding, flexibility and lack of fairness across the UK); the need to retain environmentally supportive initiatives of EMFF; improvements to the fleet; support for fishers; the need to keep legislation at the heart of any funding, in particular the Environment (Wales) Act and the Well-being of Future Generations (Wales) Act; research into sustainable fishing methods and new fisheries; and facilitating trade.
- 3.112 Other respondents highlighted the facilitation of research, collaboration with academia and underpinning of environmentally supportive initiatives under EMFF, and urged that this aspect of funding be continued after EMFF ends.
- 3.113 Several respondents suggested funding should be targeted at improving the Welsh fishing fleet. Specific suggestions included modernisation of vessels, development of innovative gear and methods, funding for improved safety on vessels, fuel efficiency improvements and improving the quality of on-board storage of catch.
- 3.114 Another emerging theme was for funding to be used to support Welsh fishers in their daily roles. Funding for new entrants to the fishing industry, funding for training, for helping fishers adapt to legislative change, and to help with diversification into other marine activities such as tourism or energy production, were all suggested as priorities by several respondents.
- 3.115 Responses which emphasised the importance of aligning new funding schemes with the Well-being of Future Generations Act advocated a holistic approach to management of Marine and Fisheries, and that funding supports this and does not encourage silo working; securing funding for future Marine Protection Area action plans; and the need for funded projects to have sustainability embedded at their core. The need to prioritise projects which work towards Good Environmental Status (GES) was highlighted.

- 3.116 One respondent particularly noted the importance of replacing the EU LIFE Scheme (the EU's financial instrument supporting environment and nature conservation projects, which has schemes such as important work in the Skerries with roseate terns) once the UK has left the EU.
- 3.117 Another theme was an emphasis on improving onshore facilities and removing barriers to trade. Suggestions included targeting funding for improving storage in Welsh ports, for processing facilities in Wales, and for improving transport routes to markets. There were also suggestions for targeting funding to improve branding, education and promotion of Welsh seafood.
- 3.118 Several respondents from both environmental groups and the fishing industry argued that subsidies to industry should be reduced over time, with the aim of enabling economic viability in the longer term. In the meantime, funding should be targeted towards incentivising practices that conserve biodiversity. Subsidies for practices harmful to biodiversity should be phased out.
- 3.119 Question 28 asked: **Should Welsh Government consider discontinuing support for any current fisheries and marine activity and why?**
- 3.120 There were 36 responses to this question.
- 3.121 Four respondents answered 'Don't know' without further comment, and four answered 'No' without further comment.
- 3.122 Ten respondents answered 'Yes'. Four of these advocated for discontinuation of any funding of specifically environmentally damaging methods such as inshore gill netting, beam trawling and scallop dredging. Two argued that subsidies for the fishing industry should be discontinued altogether in favour of supporting, developing and promoting sea angling, with an emphasis on catch and release. The remaining four 'yes' answers cited environmental, ethical or economic viability concerns for their answer.
- 3.123 A number of themes emerged from the responses which argued that funding should not be discontinued. Several responses highlighted the importance of adhering to legal obligations, particularly the sustainable development commitments set out in the Well-being of Future Generations (Wales) Act 2015, and the requirements of the United Nations Convention on the Law of the Seas (UNCLOS), and argued that resource demands from such legislation will increase rather than decrease. Projects around land-based pollution, climate change and marine litter, the damage done by scallop dredging and the cumulative impacts on wildlife of wind and tidal energy production were all put forward as suitable candidates for future funding.
- 3.124 One respondent suggested funding be used for a service that collects fish from the North of the country and transports it to the markets in the South.
- 3.125 Several respondents, while not necessarily arguing that funding be discontinued after EMFF, expressed frustration with the current Welsh

Government Marine & Fisheries management of funding. One argued that a new structure be developed to manage the sustainable development of Welsh Marine & Fisheries sectors, to be run at arm's length from the Welsh Government and include representatives from industry, academia and the third sector, while another advocated for significant improvements in how the Welsh Government integrates with key sectors, stating that there are current EU funded projects that waste public money and have no potential to create jobs in Wales.

- 3.126 Question 29 asked: **What opportunities are there to secure further investment for fishing and marine?**
- 3.127 There were 29 responses to this question.
- 3.128 The industry most commonly identified as likely to attract investment was marine renewable energy. Aquaculture was also a popular answer, as was diversification, although respondents stressed the difficulties associated with equipping fishing vessels to provide alternative services.
- 3.129 The marine renewable sector was also suggested as an inward investor to support the co-existence of marine renewables and commercial fishing.
- 3.130 Two respondents interpreted this question as being about investment from government funds and argued that public money should not be used to invest in fisheries, for environmental and ethical reasons. Another added that if conservation is not taken seriously then investment into the fishing industry is pointless.
- 3.131 Several responses argued that if sustainable, seasonal Welsh seafood is well promoted this in turn will promote investment.
- 3.132 One response argued that banning inshore netting in order to improve Samonids sea-angling would attract investment.
- 3.133 Increasing the amount of fishing, or changing the quota system so that quotas can be distributed according to community need and stocks, was suggested as a way to generate investment.
- 3.134 One respondent suggested that investment be used to support opening of processing facilities in order that the Welsh fishing industry could process their own catches.
- 3.135 One response argued that if Welsh Government fights to expand the Welsh fishing industry, then tax revenue from fisheries will also increase, and this could be used for funding and investment. Another suggested a central fund be established which would act as a bank that would loan money to applicants at interest, and the interest would develop a fund for future generations.

Free-form Responses

- 3.136 There were four responses which were free-form and not submitted via the consultation form. These were from the National Union of Rail Maritime and Transport Workers (RMT), the British Ports Association, The Isle of Anglesey County Council and a private individual representing the interests of sea angling. In addition, several responses included a general response in addition to the completed form. Apart from the RMT and British Ports Association, similar themes emerged from free-form responses as from responses to the consultation questions.
- 3.137 The RMT response emphasised the self-employed status of Welsh fishers and advocated for the Welsh Government's future fisheries and marine policies to be set in this context and for their *Save Our Seafarers 2020* campaign to be incorporated into policy to protect Welsh seafarers from damaging deregulation.
- 3.138 The British Ports Association did not submit a response specific to Wales, but instead submitted their recent report, *A New Deal for UK Fishing Ports* (August 2019) for consideration.

4 Consultation meetings with Stakeholders

4.1 Consultation meetings with industry stakeholders were held in Burry Port, Caernarfon, Aberystwyth, Milford Haven and Pwllheli. Attendance at these meetings was disappointingly low, with only 10 people attending in total. The consultation period coincided with a long period of settled weather and tide times, meaning that many fishers were out at sea. With such low numbers it was possible to have in depth discussions with attendees. The main points are included in the main section of the report but are also summarised below:

- Sustainability of the Welsh sea was of huge importance as there was no point in over fishing resulting in having no stock to catch next year.
- Quotas could be used to generate investment in the Welsh industry. Allowing EU vessels to fish in Welsh water for a price which could then be reinvested in the Welsh infrastructure.
- More education is needed in schools to teach children how to cook fish and the benefits of eating fish to develop the next generation of consumers.
- More needs to be done to make the industry more attractive to newcomers and also develop the skills of current industry to be able to access new fisheries.
- The focus on tourism means lots of harbours are being turned into marinas which are too expensive to access for most fishermen.

- Currently the logistics for seafood are too complicated. Fish from Wales goes to Plymouth or on to Billingsgate and then back to local restaurants in a refrigerated van. Fishers should be able to sell straight off the boats to local restaurants.
- The EMFF application process is too complicated.

4.2 A consultation meeting between Wales Environment Link (WEL) member representatives and Welsh Government was held in Cardiff. There were eight WEL attendees representing four eNGOs: THE Marine Conservation Society (MCS), the Royal Society for the Protection of Birds (RSPB), Client Earth and Wales Environment Link. The issues raised at the meeting echoed the issues raised in the eNGO consultation responses, as demonstrated below:

- Silo working: the WEL representatives were critical of the consultation document for focusing on fisheries, and advocated a holistic approach to marine and fisheries rather than looking at these areas in isolation. They also expressed concern that other sectors, such as ports, were not addressed.
- Work on Brexit appears to have caused other important work to be put on hold. Attendees emphasised the importance of continuing to work towards GES regardless of Brexit and Brexit outcome.
- The Welsh Government approach to Marine and Fisheries seems very different to their approach to land management, which takes an ecosystem based approach and carries a strong commitment to environmental legislation, and sees management as restorative, not merely exploitative.
- Policy approaches to Marine and Fisheries need to be more integrated and to take the wider environment into account and this should not be delayed, as climate change is a ticking clock, and environmental issues are going to grow bigger and more urgent. Welsh Government needs to address this in policy and marine management.
- Concerns that the UK can't police its waters, and that marine conservation policing has not been embedded into Welsh Government control and enforcement initial staff training.
- Lack of transparency: stakeholders need to be informed much more effectively about funding awards for MPAs.
- Stakeholder involvement is vitally important and Welsh Government should consider setting up new stakeholder working groups.
- Welsh Government should push for Brand Wales marketing of sustainable Welsh fish in schools so that sustainability and local messaging becomes ingrained in young people.

Annex A – List of Responding Organisations

List excludes five organisations who asked to remain anonymous.

British Ecological Society

British Ports Association

Bwyd O'r Mor / Pwlheli Seafoods Ltd

Cardigan and Pembrokeshire Fish Producers Ltd

Câr-Y-Môr - For the love of the sea - A community Benefit Society

The Crown Estate

Cyngor Sir Ynys Mon / Isle of Anglesey County Council

Deepdock Ltd

Friends of Pembrokeshire Coast National Park

The Game and Wildlife Conservation Trust

The Llyn Fishermen's Association

The Llyn Pot Fishermen's Association

Marine Conservation Society

Menai Strait Fishery Order Management Association

National Resources Wales

National Union of Rail Maritime and Transport Workers (RMT)

Pembrokeshire Coast National Park Authority and Snowdonia National Park Authority

Pembrokeshire County Council

PLANED

Royal Society for the Protection of Birds (RSPB)

Seaweed Forum Wales

South & West Wales Fishing Communities (SWWFC)

Wales Environment Link

Welsh Federation of Sea Anglers and Angling Cymru

Welsh Fisherman's Association / Cymdeithas Pysgotwyr Cymru

Welsh Local Government Association

Wildlife Trusts Wales

Wonkey fishing trawlers Swansea

Annex B: Detailed Summary of Responses

The Marine Environment: Questions 1, 2 and 3

- b.i There were 43 responses to question 1, 43 to question 2 and 43 to question 3.
- b.ii The responses included a variety of recommendations and comments, which here are grouped into the following, non-exhaustive main themes:
- b.iii Environment and Biodiversity
- Ensuring administration of fisheries is responsive to the state of fish stocks; that fishing is done sustainably.
 - Supporting the commitments of the WNMP.
 - Creating no-take zones – this will help with stocks and support seabirds which are globally threatened as well as nationally.
- b.iv Silo Working by Welsh Government
- The consultation document was criticised by environmental groups in particular for focusing on fisheries in isolation rather than approaching marine environment, including fisheries, in a holistic way.
 - The lack of resources for the Welsh Government Marine Branch was a cause for concern noted by several environmental organisations.
 - Importance of Stakeholder involvement.
 - Several responses advocated collaborative approaches to environmental management and monitoring of Welsh seas.
 - A broad input from stakeholders will be needed to achieve and maintain Good Environmental Status (GES).
 - Open forum stakeholder action reviews of existing marine Special Areas of Conservation (SACs) management schemes should be held to inform more general management.
- b.v Evidence and the precautionary principle
- Fisheries Management should be based on evidence. Where there are evidence gaps, a precautionary approach should be adopted until data becomes available.
- b.vi Legislation
- Many respondents noted that The Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 should be at the centre of all future Welsh Marine and Fisheries management policies.
 - WEL organisations advocated for ‘polluter pays’ and ‘rectification at source’ schemes to be included in primary legislation.
- b.vii Protecting Welsh Waters
- Preventing foreign fishing boats from fishing within British waters was advocated in several individuals’ responses, as was preventing non-Welsh UK boats from fishing within Welsh waters.

- b.viii Coastal Communities
 - Welsh Government was urged to recognise the social and economic importance of fishing to communities in Wales.
- b.ix Supporting the fishing and aquaculture industries
 - Welsh government was urged to:
 - i. engage with the industry in a more open, honest and proactive basis on a local level, deliver on its commitments and promises, and actively engage with feedback from the industry, in order to build trust with stakeholders;
 - ii. Grow and support the bivalve fisheries in Wales, in particular the mussel fisheries in the Menai Strait;
 - iii. Rebuild the fishing industry's infrastructure, source marine safety equipment within the UK, and introduce boat building apprenticeships, support boat building and boat repair, net making and net repair, fishing equipment manufacture and encouraging young people into the industry
 - Other suggestions for supporting the industry included resisting leaving the EU altogether, ending total allowable catches, and fast-tracking applications for shellfish cultivation areas.
- b.x Angling
 - Responses from anglers and angling organisations argued that the best way to protect the marine environment was to prioritise sea angling over commercial fishing. They argued that prioritising the commercial sector will cause stocks to go down, as commercial fishing is hugely damaging to the marine environment, and causes money to be lost from angling tourism. They also argued that promotion of sea angling would be supportive of coastal communities.

Sustainability and Fisheries Management - Questions 4, 5 and 6

- b.xi There were 44 responses to question 4, 33 to question 5 and 36 to question 6.
- b.xii The responses included a variety of recommendations and comments, which here are grouped into the following, non-exhaustive main themes:
- b.xiii Environment and Sustainability
 - Size limits should be enforced.
 - Ban inshore gill netting.
 - Ban fishing for any species during its breeding season.
 - Whelks are subject to minimum landing length but are riddled by width and this should be legislated for, as it has been in other devolved authorities.
 - Monitor and manage brown crab stocks, as the current effort is unsustainable. Undersized brown crabs should not be used as bait and this needs to be monitored.
 - Implement the berried lobster ban in line with the rest of the UK.

- Limit number of lobster pots a boat can fish inside the six mile limit. This could be done via a pot tagging scheme.
- Implement a whelk quota.
- Make sea bass a hook and line fishery only.
- Set total allowable catches in line with the best available scientific advice from established and internationally recognised scientific institutions. Use the precautionary principle to ensure fish stocks are maintained above levels capable of producing MSY and ensuring that, by 2020, fishing mortality is below levels that will deliver MSY. An MSY or FMSY approach must be taken or Wales will fail to meet its international legal obligations under UNCLOS and the United Nations.
- Improve and invest in monitoring and fisheries science to support and inform management, particularly in the shellfish sector. Use the evidence collected to support an ecosystem based approach.
- Establish No take Zones (NTZs).
- Distribute fishing opportunities in a way which will help to ensure the long-term sustainability of fisheries. Allocate on the basis of transparent and objective environmental, social and economic criteria, to incentivise the most sustainable fishing. Any new fishing opportunities should follow these requirements to ensure the recovery and maintenance of Welsh seas.
- Safeguard Wales' existing MPA network, with future additions as necessary.
- Continued recording, monitoring and enforcement of the landing obligation.
- Continued improvement in spatial management measures, gear selectivity and other technical measures, including those to protect vulnerable species and deep sea ecosystems.
- Continued collaboration in marine and fisheries management with other UK administrations and continued collaboration with neighbouring countries in order to ensure that stocks are maintained within and outside UK international waters.
- Research innovative gear to reduce ghost fishing.
- Reduce the number of licenses as overfishing is causing massive declines in stocks.
- Reduce beam trawling and scallop dredging.
- Global temperature changes means that species are changing in Welsh waters, and species management is a challenge under these circumstances.
- Prioritise adaptive management of a wide range of species which are under threat. Brown crab, lobster, and bass are all in urgent need of management. Salmon and sea trout, Irish Sea cod, Irish Sea whiting, skate, mackerel and ray were also suggested as species that should be prioritised, as were razor clams and Pacific oysters, and species that thrive in the changing climatic conditions.
- Protect the bottom species of the food chain.

b.xiv Fisheries Management Recommendations

- The Welsh Marine and Fisheries Advisory Group (WMFAG) is at the lesser end of the continuum of co-management and a fully collaborative

co-management of Fisheries and the marine environment should be introduced.

- The return of Inshore Fisheries Groups with the development of the Inshore Fisheries and Conservation Authorities (IFCA) model in Wales, or similar, with a focus on good governance and facilitation, possibly from external sources. Community ownership and management of fish opportunities within a co-managed approach to sustainable fisheries management and alignment to Welsh Government's Shared Prosperity agenda.
- Completion / implementation of management, as identified by the Assessing Welsh Fisheries Activities Project.
- An adaptive management approach based on monitoring could provide flexible and responsive decision-making, and fishermen could play a role in collecting data and monitoring the status of stocks.
- Management needs to be tailored to the individual context of specific fisheries and must have ecological and broader environmental considerations at the heart of its design.
- Ensure the scientific community are a significant player in adaptive management and do not just listen to the fishing industry.
- Welsh Government should renew previous commitment to growing aquaculture production for both shellfish and finfish.

b.xv Industry Recommendations

- Prioritise selling seafood from Welsh waters in the UK. If not possible to sell domestically, don't fish to those levels.
- Creatively promote sustainable fish and shellfish.
- Ensure long term sustainability of fishers as well as stocks.
- Communication must improve between Welsh Government and fishers. Engagement must exist from Ministerial level down.
- Prosecute illegal harvesting of high value crustaceans and finfish.
- Target land based aquaculture development.
- Open up different fisheries, such as razor fish.
- Leave the EU. The CFP has nearly wiped out North Sea cod and allowed bass stocks to decline to critical levels. Ban restaurants from selling bass until stocks have recovered to sustainable levels and are being properly managed post-Brexit.
- Prioritise the licencing of ecosystem/3D aquaculture systems.
- Prioritise control and enforcement which is crucial to maintaining marine fisheries.
- Make it easier for fishers to process their haul and sell locally.
- Listen to fishers and those involved in the industry and take note of their expert opinions.
- Audit imports and exports and attain a balance through reducing the count on seasonal quotas.
- Tuna are now caught regularly in the UK but the Welsh fleet have no quota for these fish - this must change.
- There are potential opportunities for Nephrops, Sprat, and Squid fisheries within the Pembrokeshire industry. These fisheries use specialized methods which would require investment on board vessels. Market vectors

could be established through short term licensing to vessels from outside Wales while the fishery grows to attract local investment and establish export markets. Regulation of limit to effort could be implemented through restricted numbers of licences when fisheries are established.

b.xvi Legislation

- Welsh Government should comply with the Habitats Directive and other existing regulations that allow for marine fishing to continue, with future objectives being to safeguard marine ecosystems in partnership with fishers.
- The commitment to bring forward a Welsh Fisheries Bill was welcomed.
- The UK Fisheries Bill does not place a duty to achieve the sustainability objectives, and there are legal concerns about this. The Minister committed to explore whether to place a duty on Welsh Ministers to take steps to meet the objectives through the Brexit and Our Seas consultation, and this has not happened. The Welsh Government should clarify how it will ensure this duty is in place.
- The Welsh Government needs to modernise its legislative framework, which it has failed to do in the past. Resources are currently misdirected with too many staff engaged in quota management and too few involved in management changes and delivery of fishery openings.
- The emphasis should be on Welsh Government having the legal competence and having a fair share of the opportunities available post EU-Exit. To be responsible for the whole Welsh Exclusive Economic Zone including beyond the 12 nautical miles would provide that administrative flexibility and responsiveness.

b.xvii Angling

- Make Wales the angling capital of the West.
- Management structures should include a focus on sea angling, through recognition of the benefits this delivers over and beyond that of commercial fishing practices and should initially start with European sea bass.

b.xviii Recommendations for Welsh Government Changes

- There were a number of criticisms of and suggestions for changes in Fisheries management within Welsh Government.
- For instance, that staff should have formal training in fisheries management, and that they should have to spend at least a day at sea a year, and keep what they learn in mind when making decisions that affect fishers' livelihoods. Officials should have practical fisheries and aquaculture experience. Reliance on Government agencies and advisors from outside Wales has sometimes presented a confused, invalid, biased and uniformed view of commercial aquaculture opportunities in Wales.
- Several respondents noted limited marine capacity within Welsh Government, Natural Resources Wales (NRW), local authorities and the environment non-governmental organisation (eNGO) sector. They advised more progress, oversight, innovation and direct project work.

- There were a number of suggestions for new roles within fisheries management. For instance, Regional Fisheries Officers or local management groups with real powers, who can be approached by fishers easily; a Welsh Government ambassador with no conflict of interest but who has strategic understanding of markets and global issues; a Marine, Coastal and Fisheries Ministerial role in Welsh government with a dedicated budget and expert staff, and employ fisheries inspectors who can be contacted at all hours to tackle illegal netting, who can prosecute illegal netting effectively; and a charismatic passionate individual to run an overhauled Fisheries and Aquaculture division.
- The proposals in the consultation were criticised for not providing enough detail. Welsh Government was urged to hold an additional consultation on the specifics of their adaptive management proposals. In particular the controls that will be put in place, how appropriate stakeholder involvement will be ensured and how use of the proposed powers will be scrutinised.
- Support should shift towards collection and analysis of scientific based data collected in conjunction with the fishing fleet. At the moment, funds are allocated to enforcement by civil servants or retired police officers with no experience of the fishing industry.
- Use of a catch app to eliminate lag between information being sent and received. This could also be used as a medium to inform fishers of meetings or management measures as they will log into it after every day at sea. Currently communication is too slow.

Fishing Opportunities - Questions 7, 8, 9 and 10

- b.xix There were 38 responses to question 7, 34 responses to question 8, 31 responses to question 9 and 32 responses to question 10.
- b.xx The responses included a variety of recommendations and comments:
- b.xxi Recommendations for management of fish stocks for the wider benefit of people in Wales and coastal communities
- Focus on collaborative working with local communities and industries.
 - No deal will lead to collapse of fisheries economies, and this collapse should be managed: support micro businesses and refrigerated fish vans which sell locally.
 - Encourage tourism.
 - Negotiate with other parts of the UK for a greater share of fishing opportunities in UK waters, including in the Welsh zone.
 - Develop a means by which Welsh Ministers would be caretakers of additional quota with responsibilities to sustainably develop, maintain and manage Welsh quota holdings for and on behalf of future generations of Welsh fishers and their coastal communities.
 - Protect opportunities for the inshore fleet from larger foreign vessels, and ban English boats from inside the 6nm limit.
 - Soft shelled and berried crabs must not be taken.

- Remove the bass entitlement from Welsh boats (except trawlers).
- Actively promote and develop sea angling in Wales, and recognise it brings in significant tourist money that boosts coastal economies.
- Stop illegal landing of undersize sea bass. Raise minimum landing size for sea bass, and move towards hook and line only commercial prosecution of bass.
- Protect salmon and sea trout from bycatch from commercial netting.
- Additional quota should be allocated on the basis of transparent social, economic and environmental criteria in a way that incentivises the most sustainable fishing practices, and in line with the Well-being of Future Generations (Wales) Act 2015. This could be in the form of selectivity improvements, both in gear and behaviour, which are vital for reducing discarding of unwanted species and improving target catch. New quota should be managed as a public resource for the benefit of all. Any future quota scheme should seek to: avoid increased gear conflict; avoid displacement; incentivise and drive investment in low impact, environmentally responsible fishing; minimise the environmental footprint of fisheries on the marine ecosystem; and minimise bycatch and choke.
- New fishing opportunities will provide a catalyst for investment in fleet capacity to access fisheries hitherto unavailable to the Welsh fleet, whilst not increasing capacity beyond sustainable limits. In the shorter term, potentially underutilised stocks could be leased to provide the strongest possible economic links for Wales until such time as Welsh fishing capacity is developed to sustainably harvest our resource allocation.
- Introduce a 'risk pool', allowing collective management of quota, to spread risk of exceeding choke allocation across collectives, providing a 'safety net' for vessels as well as incentivising innovation in avoiding choke species.
- Use voluntary short-lived fisheries closures to avoid discards.
- Use VMS and Remote Electronic Monitoring to reduce discards.
- Look to Norway and Scandinavia for sustainable models of fisheries management.
- Focus on Section 6 of the Environment (Wales) Act; create NTZs or large scale 3D ecosystem aquaculture systems.
- Use an adaptive management strategy and ensure full input from stakeholders.
- Prioritise a fair quota system for Welsh fishers.
- Drive economic growth and jobs through improvement of infrastructure, logistics, processing capacity and fish auction sales together with the ancillary trades and services.
- Innovate to harvest Razors and farm species of seaweed, shellfish and Lump Fish that have non-food uses that will benefit our environment - in summary, take fisheries seriously.
- Nationalise the fishing quotas so that they can be handed out according to community need and fish stocks.
- Promotion and education – e.g. serving locally caught fish in schools and teaching fish identification and preparation.

- b.xxii Recommendations for mechanisms to help the Welsh fleet adapt to new fishing opportunities
- The Welsh Government should focus on difficulty accessing EU markets post-Brexit, through policy initiatives to secure access to export markets, marketing activities to boost domestic consumption, training for fishermen, and investment in onshore facilities.
 - Stay in the EU and renegotiate the fishing areas.
 - Do not allow killing of whales in Welsh waters.
 - Enforce rod and line only for fish, prices will go up as people will pay for the quality.
 - Greater stakeholder participation in Welsh Government fisheries management.
 - Allocate new quota appropriately in line with seasonal fishing.
 - Help with port infrastructure and transport to markets.
 - Grants for vessel improvement and new gear.
 - Limit numbers for specific species to prevent reliance on a single species.
 - Environmental, social and economic criteria should be used in the allocation of new fishing opportunities.
 - Adaptations to the fleet should have minimal environmental impact and employ the most sustainable gear available.
 - Any new fishing opportunities must comply with the MSY approach.
 - Open the langoustine fishery off the Smales and allow long lining for tuna and swordfish.
 - Give licences for white fish and do not allow them to be sold to non-Welsh fishers.
 - A grant scheme to replace EMFF will be needed.
 - New entrants into the industry, including women, should be supported.
- b.xxiii Generation of sustainable funding by industry and coastal communities: responses
- A clear policy direction is needed from Welsh Government.
 - Leasing out fishing opportunities to other nation vessels, at least in the short term, could generate funding.
 - Offshore energy developers could be obligated to fund community projects.
 - Funding will come from the increased taxes fishers will pay when the industry expands.
 - Integrate tourism and aquaculture to support coastal job diversification and restoration of high value fisheries.
 - Use advertising and marketing to get local buy-in and investment.
 - Focus on species that are attractive to anglers, such as bass. Exploit sea angling. Make Wales the first area of the UK to have properly managed and policed inshore fisheries.
 - Opportunities will come from removing the EU boats that currently fish Welsh waters.
 - Sustainable funding only comes from private enterprise, most likely based on inherent strengths of the fishing industry and coastal communities.

- Devolving powers of seabed management from the Crown Estate to Welsh Government would simplify marine planning and allow more adaptive management.
- There are arguments that indicate the validity of some form of resource rental initiative, allowing those engaged in extraction of the public resource of wild fisheries, to 'pay' society for the privilege of doing so. However in fisheries where this has occurred, it has been accompanied by a scene shift in the culture of management by Government, with Industry and Government operating in a more aligned and collaborative way – with Government's responsibilities being to reflect the value back to wider society. This type of model diminishes the participation of other parties.
- Penalties and fines for illegal fishing.
- Protect the marine environment, do not just harvest it for food.
- Establishment of a viable producer organisation.
- Replace EMFF with the money previously sent to the EU. Create a steering group that will use the money wisely.
- 3D farming to raise the profile of sustainable aquaculture.
- Move towards a management system which uses Maximum Economic Yield (MEY) as a control method of stock and not Maximum Sustainable Yield (MSY).
- Introduce a license system with bag limits on angling.
- Introduce a total ban on landing of our native migratory fish, salmon and sea trout.
- Introduce a policy to grant planning permission to mixed aquaculture facilities.

b.xxiv Recommendations for managing Choke species effectively

- Several respondents noted that choke species are not an issue for the majority of the Welsh fleet.
- More selective fishing will help reduce unwanted catch.
- Collaboration between industry and gear research bodies.
- A balance between TACs, MSY and the landing obligation must be pragmatic to avoid chokes.
- A risk pool of new quota could be set up.
- Keep quota in reserve for when choke is a problem, giving the option to land the choke but a proportion of the sales be allocated to an organisation such as Seafish; this incentivises fishers not to catch chokes but prevents discards if they are caught.
- Viable fish should be thrown back. Only dead or dying fish should be landed.
- Consider days at sea effort where everything caught is landed, and areas closed when over certain percentage of juvenile fish are caught.
- There should be a quota for spurdog, currently a choke species.
- Install on-board CCTV.
- Encourage use of more selective gear. Square mesh panel should not be used.
- Improve knowledge of choke species.

- Use the North Western Waters Advisory Council (NWWAC) Choke Mitigation tool to minimise impact of the choke.
- Consult other nations who have well managed, sustainable fisheries.
- Solutions for choking such as avoidance, selectivity and quota require adaptive management strategies derived from various stakeholder involvement and quality data collection and analysis.
- Consider reserving a proportion of any additional quota arising post-Brexit to minimise / offset choke. In the longer-term a more holistic, ecosystem-based and precautionary approach is needed for the Welsh and UK Governments to meet their international obligations of GES and MSY and protect this public asset for future generations.
- The Welsh Government could also give consideration to Defra's proposed targeted scientific trial of an effort-base system in English Inshore Waters and how this might be applied in relation to Wales.
- Leave choke species alone. Species within mixed fisheries with low quota have that status for a purpose. "Developing proposals to reduce this risk" means lowering or ignoring that status and is incompatible with maintaining sustainability.
- Look to Canadian groundfish fishery, where industry led reform with an emphasis on accountability has led to former choke species recovering.
- Introduce remote electronic monitoring (REM) for all over 10m vessels and selected (but ideally all) under 10m vessels to ensure compliance with the landings obligation. Random observer visits should also be carried out to back up this data.
- A choke mitigation plan for Wales should be developed.
- Choke species should be retained, handed over to authorities for a nominal price and total weight should count against other species quota.
- Areas known to have choke species should be closed to fishing.
- Reduce fishing efficiency. More small vessels and more people employed.

Shellfish and Aquaculture – Questions 11, 12 and 13

- b.xxv There were 38 responses to question 11, 34 responses to question 12 and 29 responses to question 13.
- b.xxvi The responses included a variety of recommendations and comments.
- b.xxvii Respondents were asked whether they agreed with proposals in the document to manage shellfish and aquaculture flexibly. Where respondents stated they didn't know if they agreed, most did not give a reason. The following points were raised by these respondents:
- The proposals did not include enough explanation.
 - More evidence is required and it would depend on conditions and recent events management.
 - RNLi support is needed.
 - Only promote closed containment aquaculture.

- There should be a lobster hatchery based in Fishguard due to water quality.
- Important to see how measures are transparent, how powers are to be limited in scope and that all decisions are evidence-based on independent scientific recommendations.
- The Several Order system could benefit from review but would need primary legislation for such a review. Any review must ensure compliance with Environment (Wales) Act (2016) and the Well-being of Future Generations Act (2015) and to be consulted on separately.

b.xxviii Some respondents did not agree with the management proposals in the consultation document. A non-exhaustive list of comments and criticisms follows:

- Flexible management of Cardigan Bay scallops would benefit scallop dredgers hugely for a while but benthic organisms and their predators would not benefit.
- There needs to be a ban on landing berried lobsters, in line with the rest of the UK.
- The proposals seem to lack understanding of the identity and needs of the aquaculture sector. Shellfish fisheries and shellfish aquaculture are not the same thing, and cannot be managed in similar ways as the consultation document suggests. Aquaculture cannot be managed by government, as day-to-day, season-to-season decisions have to be made by the Operator, the same as land agriculture. Rather, government can permit aquaculture. The document implies that the policy would lead to undermining security of tenure for the aquaculture operator. However the document also commits to growth of the sector, which is a contradiction.
- The 1967 Sea Fisheries (Shellfish) Act provides for the creation of fishery (either several or regulating or hybrid) orders. This does not provide “exclusive access to the seabed for a period of time”, but rather any activity that harms the process of cultivation is not allowed. This does not prevent a multitude of other activities taking place within the boundaries of fishery order areas, even on the seabed.
- The process of application for new order is overly protracted and uncertain. However, the 1967 Act is applicable in England and Wales and the legislation functions more effectively in England. The failure to apply the procedures evident within the 1967 Act lie entirely within an internal failing of long standing inside of Welsh Government. This has been acknowledged by government officials. This should be the subject of a formal internal investigation.
- The lengthy application process is being addressed by putting new processes in place and these new arrangements look set to work very well, and make the proposals in the consultation document seem redundant.
- One respondent argued that the regime established under the 1967 Sea Fisheries (Shellfish) Act is the basis for the most successful shellfish cultivation in the whole UK, in the Menai Strait. This Act is arguably the most effective piece of UK fisheries legislation on the statute book and it should not be discarded lightly. Shellfish cultivation

in the sea is not possible without recourse to the Act as the public has the right to fish in the sea under Magna Carta, and it cannot be removed by a licensing regime, only by Several Orders under the Act.

- Shellfish cultivation requires investment of time and resources. The shellfish farming in the Eastern Menai Strait have been able to develop and refine cultivation techniques under a 60 year Fishery Order, and this would not have been possible under a short term licence.
- There may be circumstances where a streamlined approach running alongside the existing Several and Regulating Order system may be appropriate. This may be related to the geographic scale of the proposed operation, proximity to Protected Sites, and method and species being cultivated, as a way of 'kick-starting' new cultivation initiatives. This would need to be carefully designed and implemented to avoid undermining the existing Several and Regulating Order approach which works well on some of the most successful shellfisheries in Wales.
- The consultation does not join up with land-based ecosystem activity and in particular, the benefits that some shellfish species have in supporting nutrient loaded water bodies. The public goods agenda mooted by Welsh Government needs a joined up approach between land and marine which is currently missing.
- The aquaculture management regime would appear to be solely growth focused, this may not be appropriate in some areas and we would suggest that a management regime considers this.
- A specific consultation on the proposals under questions 5, 6, 11 and 12 should be held with a greater level of detail available.
- The Environment (Wales) Act gave Welsh Ministers specific powers relating to Several and Regulating Orders, to secure protection for the environment and for European Marine Sites specifically – including the requirement to include environmental provisions in these Orders, and powers to serve site protection notices and vary or revoke Orders. The current proposal appears to remove this ability and require alternative mechanisms to achieve this. Welsh Government committed to address WEL concerns in Guidance on Part 5 of the Act. WEL assumes this guidance remains relevant until any further legislative change is made, and urges that it is produced, with the engagement of interested parties including WEL, without further delay.
- The management regime would appear to be solely growth focused; this may not be appropriate in some areas and a management regime should consider this. To facilitate growth and give businesses certainty it is essential to ascertain both the carrying capacity and the cumulative capacity of the receiving water body and the sensitivity of the habitat and any designations.

b.xxix Flexible management of shellfish fisheries

- [Manage] Scallop fisheries to maintain sustainability.
- Use real-time monitoring and flexible and adaptive management of shellfish stocks that span the 12nm boundary.

- Shellfish management should take account of natural constraints facing inshore fishers. Flexibility allows fishers to carry over unused quota without compromising sustainability.
- Have closed seasons for individual fisheries. When one is closed, another can be opened.
- Put the long-term sustainability of the ocean's resources before greed.
- Reduce whelk effort in line with increased effort with decrease in average size.
- Ensure that the regulatory regime implemented is clear and proportionate, and easy for interested parties to engage with.
- Use the waters surrounding Bardsey Island as a trial area for shellfish fishing by island residents only. Effort can be linked directly to the regenerative ability of the target species, and management can be done collaboratively by officials, fishers, scientists and business interests.
- Monitor species numbers against the changing temperature and use the data to manage shellfisheries.
- In addition to securing the necessary powers to implement a more adaptive management regime for Wales' shellfisheries, there is an equally important need to address evidence gaps in terms of shellfish stock assessments and move towards informed fisheries management measures that control either or both effort and catch. Currently, certain shellfish fisheries may be being fished at or near capacity, impacting on the ecosystem's ability to sustain a viable long-term shellfish industry.
- Most UK shellfish stocks have not achieved GES. In pursuit of GES, managing commercially exploited stocks within safe biological limits capable of producing MSY, the amount of a species removed by recreational or non-commercial means should also be considered when calculating the levels at which it can be fished sustainably.
- The principle of charging a fee for access to permitted fisheries was supported by NRW, who advocated investing the funds into data collection, monitoring and control, and research.
- Domestic measures to protect berried lobster and crawfish should be brought forward.
- New fisheries in razor and surf clams should not be opened until research is undertaken to better understand environmental impacts.

b.xxx Flexible management of aquaculture

- Currently native oyster (*Ostrea edulis*) populations are in decline due to environmental pressures, while the Portuguese oyster *Crassostrea gigas*, an invasive species, is increasing its range in Wales. Oysters are an important part of ecosystems as they filter tremendous volumes of water. Both species could be farmed together and used as bio-filters to help reduce siltation and contamination from farm run-off and sewage treatment plants.
- When sites are evaluated and passed as fit for purpose by NRW, these sites could be allocated faster to companies wishing to invest. Involve local populations as much as possible rather than giving it all away to one or two big companies.

- Offshore rope systems might not need the protection of a Several Order, so a new licensing regime for establishing these systems could have a very positive effect.
- Welsh Government might consider a proactive approach to target investors and investment opportunities. There remains zero preparation to welcome or encourage inward investors to Wales despite nearly 30 years of requesting such an approach.
- The management regime should collate and disseminate data that may be applied to ease future developments, such as from offshore mussel farms regarding environmental impacts and benefits.
- Operators approach The Crown Estate for leases of sites but although this lease gives the operator exclusive rights to the seabed, it does not extinguish the public right to fish; only a Several Order can do this. As shellfish cultivation is currently exempt from the requirement for a marine licence, The Crown Estate can find itself as the only Competent Authority under the Habitats Regulations. Welsh Government and its delivery bodies are better placed to regulate aquaculture on the seabed. A new management regime for aquaculture presents an opportunity to ensure that all necessary consents, licences and required assessments under relevant environmental legislation are dealt with under one umbrella, with defined timescales. This would provide more certainty for operators and stakeholders, and ensure that potential environmental impacts are being appropriately managed.
- The proposals seem to be mainly targeted at shellfish, but finfish should also be considered.
- Aquaculture represents one of the main invasive non-native species introduction pathways in the marine environment and NRW considers that caution should be exercised in relation to the use of non-native species in aquaculture.

b.xxxi Comments on increasing aquaculture production in Wales

- In order to generate sufficient levels of production to achieve realistic economic viability, there is a need to be ambitious and think bigger. This is the case for hatchery systems for shellfish seed production and more so for on-growing of finfish. There is limited scope for cage farming on the Welsh coastline and so land-based and/or novel operations at a realistic scale are needed in order to support a serious aquaculture industry.
- There is increasing interest in marine recirculation systems for super-smolt production and there is a continuing trend towards controlled environment farming – Wales could be at the forefront of this type of farming and using this type of farming for new species and development of the required husbandry techniques, systems and diets etc. are all areas where Government support would be well targeted.
- Offshore aquaculture of fin species has a detrimental impact on the environment. Bivalve cultivation is not so harmful.
- Welsh Government should support the ground-breaking things happening in Wales. A new seaweed farm in Pembrokeshire and

scallop ranching in its infancy. Make it easier for companies to secure ground, and make funding accessible.

- Ban sand eel fisheries. Use bycatch to feed farm fish instead of throwing it back. Do not allow fish farms on the Welsh coast.
- Listen to those involved in developing commercial aquaculture and develop a closer working relationship with aquaculture businesses. Establish the appropriate baseline data to attract investors then market the opportunities.
- Copy countries who are successful at aquaculture.
- Make licensing and consent process easier.
- Encourage people to apply for licensing - give incentives.
- Do not stand by while profit decimates the environment.
- Identify aquaculture sites.
- Provide funding and support.
- Work in collaboration.
- Look for opportunities to diversify.
- Give legal help and support for dealing with leases from the Crown Estate.
- If water quality is not improved through pollution prevention, it is pointless trying to engage in any aquaculture projects.
- Get the government policies right and business will follow.
- Promote Welsh seafood more.
- The geography is wrong, too much tide and large waves.
- Adoption and implementation of relevant sector specific policies of the WNMP will be key to the sustainable development of the aquaculture sector.
- The EMFF-funded Sustainable Management of Marine Natural Resources (SMMNR) Project will play a crucial role in developing part of the aquaculture evidence base.
- There are implications of establishing aquaculture in areas of poor water quality. In addition to promoting coexistence with other marine developments to optimise marine area use, shellfish aquaculture proposals should be encouraged in areas where there is already good water quality.
- There is perhaps a role for NRW and the Welsh Government in raising awareness of the environmental legislative landscape relating to aquaculture in order to achieve an understanding of, and consensus around the importance of robust environmental assessment in safeguarding marine ecosystem resilience in support of a sustainable aquaculture industry and realistic consenting timeframes.
- Aquaculture initiatives which deliver and promote sustainably farmed angling bait as an alternative to baits collected from the wild are to be welcomed.
- Any review must ensure compliance with Environment (Wales) Act (2016) and the Well-being of Future Generations Act (2015) and should be consulted on separately.
- An informed assessment of what a sustainable industry would be like and how to secure the market place is needed. An overarching Welsh Aquaculture Technical Group (following UK and EU groups) to ensure

any new industry is sustainable (certification to the Aquaculture Stewardship Council and Global Aquaculture Alliance) should be set up. This group would offer advice and help and should comprise industries, eNGOs, regulators and academia.

- Wales should only increase aquaculture production if this can be done in an environmentally responsible manner that fulfils our commitments to Sustainable Development Goals and achieving GES.
- Welsh Government need to offer certainty to new businesses by assessing the capacity of the environment is assessed and incorporating aquaculture into Strategic Environmental Assessment (SAE) Plans that identify areas suitable for growth.
- Plans within the draft WNMP to double aquaculture are unclear and do not seem to be evidence based.
- The easiest way for Wales to increase its aquaculture production would be to increase shellfish production both on the seabed and in suspended rope cultivation systems.
- Welsh businesses' role is to identify opportunities (either alone or in partnership with Welsh Government) for aquaculture production. Welsh Government's role is to facilitate the development of new aquaculture opportunities and safeguard the future operation of existing aquaculture production.
- The interaction between Government and Industry needs to mature. Government officials are either unwilling or unable to communicate with industry in an open manner. They appear constrained by outdated and self-defeating internal processes. Industry is often told that developments are incompatible with legislation but then officials cannot describe which parts or how, due to an inappropriate use of client privilege by their legal advisors. This approach to development is entirely absurd. Without a collaborative engagement very little can be achieved. The culture of Government needs to change.

Trade – Questions 14, 15 and 16

b.xxxii There were 35 responses to question 14, 40 responses to question 15 and 37 responses to question 16.

b.xxxiii The responses included a variety of recommendations and comments:

- Welsh Government could assist with achieving growth through development of new markets.
- Transport links to remote ports could be improved.
- Aggregate landings through co-operative arrangements could increase domestic markets for Welsh caught finfish.
- Make connections with hospitality and tourism sectors. Link with Visit Wales.
- Seafood must have a key presence at Food and Drink Wales trade events. Promotion and marketing of products is key. Be proud of species that are not cod, plaice or haddock.

- Make Welsh sea bass hook and line only and market it as highest quality and most sustainable bass fishery in Europe. Ban destructive netting practices.
- Develop other finfish species into new markets and products.
- Development of any new market or products should be managed with the aim to support sustainable long-term fisheries or responsible aquaculture and contribute towards clean healthy seas and coasts.
- The Far East is a huge market for live crab and lobster.
- Consult countries who are already successful at sustainable fishing.
- Replace EMFF with a successor that will continue to support product development and food related enterprise.
- With the possibility of tariffs in the future, promoting local catch and reducing the amount of exports may be essential for some markets.
- It is highly likely that the major market for Welsh seafood in the future will remain in Europe. It is our closest market and the biggest for imported seafood in the world. Brexit present a fundamental challenge to this.
- As a levy body, Seafish has a role to play in the development of the sector and Wales receives an enhanced service from Seafish to support development in the sector. Seafish would support Welsh Government providing more financial resource to Seafish, to support activity in Wales that is aligned to its industry developed corporate plan and the Welsh Seafood Strategy, to further support trade activity through its export function.
- At present, major UK supermarkets procure shellfish from Class A classified zones, whereas the majority of classification zones within designated Welsh bivalve mollusc production areas typically achieve Class B-LT, with some at Class B or C. Improving shellfish water quality to a standard consistent with achieving Class A could potentially open up a significant internal market for Welsh shellfish.
- Market diversification should be encouraged rather than market development.
- Targets for growth and market development for existing and new seafood products have been set by the Seafish Wales Advisory Committee (SWAC), in the Wales Seafood Strategy. Achievement of these should be closely monitored and failure to achieve them should be addressed at the earliest opportunity.
- Support for small and medium enterprises (SMEs), reduction of travel distance of procured goods, and procurement of Welsh seafood could all be improved.
- Establish many local smaller scale cold storage facilities for fish and attached fish markets in coastal communities.
- Make efforts to get fish awareness in schools.
- Growth of the fishing industry will not benefit coastal communities; rather, tourism, academia and local government are crucial to coastal economies. Until fundamental ecosystems recover, growth should not be encouraged. Instead, sustainable tourism and recreation should be encouraged. The Welsh Tourist Board should hold a Wildlife Year to explore the rich diversity of Wales' marine environment.

- Prioritise completing the Ecological Coherent Network of MPAs, and ensure the network addresses mobile species conservation concerns.
- Welsh Government should support re-introduction of iconic species such as the White-Tailed sea eagle.
- Support growth of seaweed for human consumption.
- Overfishing is having a detrimental effect on stocks. You can't develop new markets without a stock.
- Put more research into aquaculture and sustainable fisheries. Then market them.
- Allow queen scallop and razor fishing within the 6nm zone. Also look at increasing quota for finfish.

b.xxxiv Most respondents to question 15 thought that the Welsh Government has a role to play in boosting UK consumer interest in Welsh seafood.

b.xxxv Respondents suggested the following strategies for boosting UK consumer interest:

- Marketing and promotion of diverse species. Promote seaweed. Branding, advertising and packaging are key factors.
- Improve local processing.
- Market Welsh waters. Develop local markets through educational and promotional activities.
- Prove that products are fished sustainably and convince the consumer that microplastic consumption is not a problem.
- Create and promote locally produced products.
- Produce finfish locally.
- Make Welsh sea bass hook and line only and market it as the highest quality and most sustainable bass fishery in Europe. Introduce standards for preserving sea bass in perfect condition and getting it to market very quickly.
- Have a joined-up approach to encouraging the public to try more sustainable and diverse seafood. This has the potential to be a positive collaborative effort between producers, sellers, environmental groups and government.
- Introduce Remote Electronic Monitoring, specifically CCTV, to provide the evidence base to give confidence to consumers and sellers that Welsh seafood is sustainably caught.
- Involve the third sector; they have access to thousands of stakeholders and can share information in relation to fisheries and the marine environment.
- Develop new products and new retail outlets, including the internet.
- Seafood needs to be involved with Sustainable Brand Values development.

b.xxxvi Regarding whether new markets for Welsh seafood outside the EU be expanded, respondents made the following suggestions and remarks:

- Find new markets via trade missions or government contacts.
- Suggested overseas markets included: Hong Kong, Dubai, Russia, the Middle East, Singapore and China.

- Domestic markets in the UK.
- Welsh and UK government departments and bodies that promote, market and advise on overseas trade could help identify new markets and their requirements, including access, food safety and transport routes.
- Short supply chains remain particularly important for supply of live shellfish.
- Why export fish at all or send fish away as fertilizer? Restrict our quotas, reduce our fleet and save the fish for future generations. Business should not rule over the environment.
- Catch recording and VMS together with the existing fisheries management and sustainable development legislation, provide the core provenance framework upon which to market seafood domestically and further afield.
- We should seek new markets for diversified activities, not look for new markets for economic activities that have no place in the future.
- Any tailored management interventions arising from the AWFA project will also help to support fishers in demonstrating the sustainability of produce and associated capture methods.
- Welsh Government officials attending seafood exhibitions in other countries doesn't help sell our shellfish. These trips are a total waste of tax payers' money. Fish merchants will sniff out new markets on their own, I'm not sure how Welsh Government can help at all in this respect.

Growth and Innovation- Questions 17, 18 and 19

b.xxxvii There were 35 responses to question 17, 33 responses to question 18 and 35 responses to question 19.

b.xxxviii The responses included a variety of recommendations and comments, which here are grouped into the following, non-exhaustive main themes:

b.xxxix Expansion of processing and other economic activities – Welsh Government's role:

- Ensure that Welsh seafood can be exported to EU and non-EU countries.
- Encourage fish buyers to visit Wales.
- Identify funding opportunities to support overseas investors and local Welsh communities.
- Ensure that the management and permitting of the fisheries and aquaculture sector is undertaken in a manner which aligns with the strategic objectives. Since 2010, Government has been unable or unwilling to effectively undertake this core objective in a meaningful way and as such, innovative activity or change promoted by industry has been stymied by turgid bureaucracy.
- Provide support to the processing sector to assist on the delivery of the core outcome. Within the current funding streams, almost the entire support package available originates within EMFF funding.

Unfortunately, as Welsh Government hasn't satisfied industry concerns, there has been very little investment commitment from Industry.

- Encourage management of a move out of these futureless activities, rather than reacting later to crises.
- Help grow the sector through funding and assistance with infrastructure, food safety regulation and training.
- Provide training and fund vessel improvements and equipment to qualify fishermen and their vessels for alternative work.
- The fishing sector often sees Welsh Government as a barrier between them and EMFF. We therefore advocate a replacement for the EU funded FLAGs, working in fishing communities and with the industry on a community-led local development basis. EMFF type funding should be easily accessible and funding applications should be simplified.
- Build relations in coastal communities. Understand roles/fishing methods/markets/geography. Too much is from behind a desk – build up trust.
- The relationship with academia can be simply improved by being industry led. Fisheries Innovation Scotland is a good example of industry leading the research agenda with a supply chain approach. There needs to be a step changes in how Welsh Government invests in research and science in partnership with the sector if there is to be meaningful output.

b.xi Coastal communities

- Coastal communities should be engaged in developing new opportunities as we would depend on the local community to join the workforce and to facilitate changes that might occur in the area due to expansion of businesses or approval of new plant and premises.
- Support communities to set up new initiatives with a mixture of expertise, money, possible outlets - especially in the early years.
- Incentives for young people to enter the industry - licences, grants, schemes for young entrants, interest-free loans to buy kit and boats.
- Succession planning - pass on skills to new blood, fishing mentors.
- Coastal communities are full of sea anglers. Organise drop in sessions locally.
- Coastal communities should be engaged, but the final decision on how money for developing fishing opportunities should be taken by fishing vessel owners, not panels of people with nothing invested in the industry.

b.xii Relationship with academia

- Wales already has a close interaction between its research community and its fisheries and aquaculture sectors. Surely the bigger question to ask is how collaboration between Government, Research and Industry can be improved. Given the skill set and mind-set that exists in Industry and in large sections of the research community in Wales, Welsh Government have been foolishly dogmatic in the relatively tepid interactions to date.

- Academia in Wales cooperate largely with long established, wealthy seafood businesses who don't require the grants secured from limited public pots. Some small SMEs simply lack the time, resources or finance to acquire these grants. Welsh academia is only interested in working with companies that can provide the match funding for large grant aid, and have historically been uninterested in expanding the aquaculture sector if it requires effort, is too limited in terms of financial return to the institute or unlikely to deliver publications in key peer reviewed journals.
- Improve communication between academia and industry. Also consider incentives.
- The scientific data shows the seas are in a critical state, and the industry says there's nothing wrong. The dire state of our inshore waters are a giveaway as to who is right. Governing bodies must remember that if marine systems are abused it is they who are to blame.
- Fishers see academia as the enemy who just want to stop all fishing. Fishers need to be clear at the start of any research project what the possible outcomes could be for them. All relationships are based on trust.
- Better join up on the thinking around the science and evidence development needed to support informed and transparent fisheries management could be achieved through collection and provision of data by industry, including through science partnerships with academia, to keep fisheries management up-to-date, proportionate and based on the best available evidence, collective efforts to promote innovation and the development of more sustainable gears and methods; and collaborative identification and resourcing of priority research areas.
- Buy-in to any scientific assessment is essential and this can only be achieved if stakeholders feel included and effective. In addition to this the data that are collected by stakeholders must be usable, there needs to be scientific rigour and the importance of this must be made clear to all stakeholders.
- It is important to start the process of stakeholder engagement in fisheries science as early as possible. Stakeholder consultation at an early stage can help to focus research into areas which are not only data deficient but are actually useful for practical management going forward.
- Create a Welsh Marine Fisheries and Aquaculture College bringing together academics and fishers to share expertise in all aspects of the industry. Apprenticeships carried out in a designated training facility with world class qualifications could help to address intake into the aging industry by attracting both male and female fishers to the industry, and bridge the social gap between academics entering the field and the aging population of Welsh fishers. Use the fishing levy to fund training and research and development in Wales.
- Emphasis on research must be balanced with the needs of the market.

- b.xliii Opportunities to grow or diversify fishing businesses in Wales
- Work with the tourism industry to promote local seafood.
 - Government cannot intervene in any positive sense. To force engagement between the fisheries and aquaculture sector and, say, tourism would be unfair and discriminatory. Whilst there might well be some natural symmetry between some fishermen and tourism in some circumstances, this will not be a common matter.
 - If fisheries are managed properly and there are more opportunities, fishermen can be fishermen and not have to rely on other industries.
 - Increase local markets using advertising emphasising current popular topics e.g. low carbon footprint.
 - Fishers need a forum to feed into Welsh Government.
 - Fishing tourism is getting smaller as customers head out to sea and don't find any fish. The stock HAS to grow – that's the starting point. The rest will follow without any big investment.
 - Diversification into other industries is challenging: both recreational activities and marine industries nowadays demand specialised vessels rather than fishing vessels.
 - Charter boats – non-fishing activity. Pleasure fishing, diving, wildlife trips.
 - Take steps to improve sea angling in Wales. Get rid of netting for bass, and English bass anglers will come to Wales rather than Ireland.
 - There is one recreational fishery in Wales that is expanding rapidly: fly fishing for mullet. Wales has all three species of grey mullet in abundance and if managed properly will become the mullet capital of the UK.
 - Marine reporting, data collection. Taking out marine scientists from NRW. Assisting other marine industries.

Fleet Sustainability - Questions 20, 21 and 22

- b.xliiii There were 35 responses to question 20, 30 responses to question 21 and 33 responses to question 22.
- b.xliv The responses included a variety of recommendations and comments, which here are grouped into the following, non-exhaustive main themes:
- b.xlv Attracting new entrants
- The workforce has an aging demographic with low recruitment. Encourage new entrants by developing a training and apprenticeship scheme. Provide funding support for such a scheme. Incentivise young people to enter the industry - licences, grants, young entrants' scheme, interest-free loans to buy kit and boats.
 - The inshore fleet has low profit margins, which could be increased by finding new more lucrative markets and increased access to existing products (for example through increased quota), exploiting new species and diversifying into other marine work.
 - Given the lifestyle, there is a lot to attract people to the role, however without Government understanding and properly complying with its

role as a manager or permitting authority for activity – how else can it be perceived other than a role which is being ‘managed’ into decline and out of existence.

- Research and development into winter pelagic and demersal fisheries would enable seasonal closure of the over-exploited shellfish sector in some areas. This would give fishers a winter wage and avoid the seasonal boom and bust income most inshore crews’ experience. Full-time employment of crews would then attract school leavers into the industry to replace the aging population of fishers.
- Make sure new entrants are micro businesses. Make sure they are based in Wales. Make sure they pay their taxes. Make sure the profits help the local economy. Make sure the product is kept in the UK.
- Provide apprentice opportunities for local persons in their own communities so youngsters don't have to leave to earn a living.
- Steady and sustainable growth creates confidence.
- A Marine Fisheries and Aquaculture training college is needed in Wales to give young people opportunity to join marine industries.
- Equal opportunities within the industry need to be promoted; females wishing to enter the industry are currently confined to working in processing or administration.
- Funding for new entrants, apprentices, sustainable innovative methods and on-board equipment for new boat owners could help to encourage new entrants.
- What we need to see is real innovation in the sector by examining truly sustainable shellfishery industry, new sustainable genetic fish proteins and developing a truly local economy for sustainably caught Welsh fish (Brand Cymru). New entrants are needed in science, marketing and sustainable foundational companies to create a new future for Welsh seas as well as support for the development of sustainable wildlife tourism, re-introduction of iconic species (i.e. White-tailed sea eagles), marine environmental protection/conservation and up-grading our existing tourism infrastructure.
- Welsh Government to effectively manage wild capture fisheries and to permit new aquaculture activities, as described within Government’s own strategic objectives.
- The Welsh fishing industry could work more closely with services such as Gyrfa Cymru / Careers Wales, Schools and Colleges to encourage new entrants.
- Eliminate expensive user owned quota or licenses and exchange them for ability to fish capabilities that are handed back to WG when user retires to be reallocated to young applicants.

b.xlvi Control and enforcement

- Enforce pot limits, whelk quota and berried lobster bans.
- Better monitoring to identify transgressors. Take licenses away from offenders.
- Do not allow foreign boats to fish in Welsh waters.
- Land all the catch and limit days at sea.

b.xlvii Environmental sustainability

- Concentrate on sustainable futures rather than growth.
- Make the fleet smaller and more numerous. Ban monofilament/plastic ropes and nets.
- Securing the sustainable management of the natural resources upon which the Welsh fleet depends, and promoting the resilience of their underpinning ecosystems is of pivotal importance in sustaining the fleet and wider coastal communities, both now and in the future. The best way to ensure that the Welsh fleet is sustained is to recover and maintain the stocks upon which it relies to sustainable levels in line with MSY and to protect the habitats where it lives.
- Long term, the fleet should be converted to other uses, not bolstered against inevitable obsolescence.
- Offer a cash incentive to fishermen who give up nets and move to hook and line.

b.xlviii Sustainable growth of fisheries and aquaculture

- Provide a secure and reliable environment for cultivation of shellfish and business investment.
- Growth will damage tourism and natural resources.
- Integrate coastal fishery cooperatives with commercial aquaculture development and research. Projects exist but there is little sense in discussing them until somebody starts listening.
- A clear example of leveraging opportunities for sustainable growth is what Seaweed Forum Wales are trying to do.
- Collaboration and appreciation of different viewpoints.
- Managing fishing effort to a level that doesn't exceed MSY will help to deliver sustainable growth from Wales' natural marine resources.
- Legislative bodies must encourage and smooth the way to sustainable growth.
- Consider diversification into tourism, energy production and aquaculture, and subsidise erstwhile fishing communities to protect our marine environment.
- The WNMP is a key tool in the sustainable development of the marine environment.
- Sustainable growth is the result of good management. Fishing requires healthy fish and shellfish stocks, aquaculture requires clean water and coastal communities require long-term assistance and support to maintain the environment that they live and work in.
- Develop stock structures towards angling activity.
- Protect the bottom of the food chain.

Evidence - Questions 23, 24, 25 and 26

b.xlix There were 37 responses to question 23, 37 responses to question 24, 34 responses to question 25 and 33 responses to question 26.

b.l The responses included a variety of recommendations and comments, which here are grouped into the following, non-exhaustive main themes:

- b.ii Suggested environmental / biodiversity priorities for research:
- Global heating / climate change / rising sea temperatures.
 - Water quality and pollution from land industries – run off / sewage / plastics.
 - Finding means to recover lost gear and investigating the effectiveness and impact of modified gear.
 - Impact of coastal netting.
 - Impact of scallop dredging.
 - Improving bass nurseries.
 - Decline of salmon and sea trout stocks.
 - Marine monitoring to underpin evidence base and give first indication of any change, this is the first step to effective management of marine environments.
 - Biodiversity and in particular the condition of Section 7 species and habitats.
 - Sustainability / overfishing of brown crab fisheries and lobsters, in particular research is needed to support legislation against taking of berried lobsters.
 - Dolphin bycatch.
 - Climate impacts on seabird populations and low trophic fish.
 - Choke species.
 - Invasive non-native species to ensure regulatory framework is kept up to date in terms of climate change triggers and management of sectors for adverse measures. A more holistic understanding and identification of vector likely to be most common in the movements of invasive non-native species to novel areas.
 - Effects on finfish of pile driving during construction of wind farms / other cumulative effects of wind farms on biodiversity and habitats.
 - Impacts [on marine environment] of sea angling.
 - Impacts of community co-management.
 - Genetic information as part of sustainable fisheries management.
- b.iii Suggested Industry Priorities:
- Assessing the status of fishing stocks and level of exploitation against MSY.
 - Micro economies.
 - Local distribution.
 - Healthy diets.
 - Stock assessments for commercially important non-TAC and data deficient TAC stocks.
 - Rotational areas of sea left fallow.
 - Knowledge of resident and transient commercial targets.
 - Possibilities of aquaculture mitigating effects of sediment overload from agricultural run-off. Decision not yet given by Welsh Government on whether whole Welsh zone should be designated a nitrate vulnerable zone (NVZ) or a more localised approach be taken.
 - Aquaculture mooring technologies and product automation.
 - Access and recreation.

- Flood and coastal erosion risk management.
 - Unregulated activities.
 - Key habitats and key species.
 - Seaweed.
- b.iii Suggested economic, environmental and social factors to be explored:
- Determining how industry could collaborate with scientists to improve knowledge of the Welsh sea.
 - Assessing the effectiveness of fisheries management.
 - Evaluating how coastal communities benefit from fisheries.
 - Raising public awareness of biodiversity in marine environment and negative impacts of human activity.
 - Education and promotion of marine environment and seafood.
 - Research should include private sector and key driver should be job creation in Welsh coastal communities.
 - Profitability.
 - Aggregate extraction and coastal defence works and the implications of these on coastal communities.
 - Research has already been done showing that benefits of angling outweigh commercial fishing, this should be reflected in management. Further research into the value of recreational anglers in terms of tourism and economic activity in coastal communities.
- b.iv Joined-up approach to evidence
- Past and present research should be reviewed under the Marine Evidence Strategy and accessible via a single portal.
 - A joined-up approach would require the Welsh Government to provide a strategic focus and direction through a set of coherent fisheries management policies. This has not happened so far.
 - A scientific hub, such as Welsh Government's Marine Evidence Strategy to coalesce marine science research.
 - Stop thinking only of fisheries, be strategic, and develop a clear vision.
 - Develop trust between all relevant groups and ensure communication. Engaging relevant stakeholders in both the development and delivery phases will be key to achieving buy in and progress against strategy aims.
 - WMAAG should be attended by more academics and other stakeholders.
 - Use aquaculture hubs to share info, such as the one being set up by Milford Haven Port Authority.

Funding and Support - Questions 27, 28 and 29

- b.iv There were 35 responses to question 27, 36 responses to question 28 and 29 responses to question 29.
- b.vi The responses included a variety of recommendations and comments, which here are grouped into the following, non-exhaustive main themes:

- b.lvii Recommendations for targeting of successors to EMFF
- Ensure that any future scheme improved on the perceived shortcomings of EMFF.
 - Retain environmentally supportive initiatives of EMFF.
 - Target improvements to the fleet and support for fishers.
 - Keep legislation at the heart of any funding, with particular focus on the Environment (Wales) Act and the Well-being of Future Generations (Wales) Act.
 - Target research into sustainable fishing methods and new fisheries; and facilitating trade.
- b.lviii Shortcomings with the current funding system, to be addressed in any new scheme
- Funds being hard to access.
 - Systems being inflexible in the face of rapid change.
 - Guidance provided being poor or overly complex.
 - Rules about who can apply for funding being restrictive, and the awarding process not being sufficiently transparent.
 - A perception that the playing field is not level and that Welsh fishers applying for EMFF funding are disadvantaged relative to Scottish, Irish and English fishers, and that UK fishers are disadvantaged relative to other EU fishers.
- b.lix Reasons given for discontinuing funding
- Funding should not be given for environmentally damaging methods such as inshore gill netting, beam trawling and scallop dredging.
 - Subsidies for the fishing industry should be discontinued altogether in favour of supporting, developing and promoting sea angling, with an emphasis on catch and release.
 - Environmental, ethical or economic viability concerns.
- b.lx Reasons given for continuing funding
- In order to support the industry in the face of changing regulations.
 - To adhere to legal obligations such as the Well-being of Future Generations (Wales) Act 2015.
 - To address environmental issues.
 - To support trade.
- b.lxi Suggested opportunities for investment
- Marine renewable energy.
 - Aquaculture.
 - Fleet diversification.
 - The marine renewable sector was also suggested as an inward investor to support co-existence of marine renewables and commercial fishing.
 - Well-promoted, sustainable, seasonal Welsh seafood.
 - Banning inshore netting in order to improve Samonids sea angling

- Increasing the amount of fishing, or changing the quota system so that quotas can be distributed according to community need and stocks.

Free-form responses

- b.lxii There were four responses which were free-form and not submitted via the consultation form. In addition, several responses included a general response in addition to the completed form.
- b.lxiii The British Ports Association (BPA) unfortunately missed the deadline for a tailored response to the consultation but submitted their report *A New Deal for UK Fishing Ports* (August 2019) for consideration. Although not specific to Wales, the BPA represents ports throughout the UK. The report recommends:
- A UK wide transformational fisheries fund to replace EMFF, which prioritises infrastructure, diversification of coastal economies and competitiveness of ports.
 - That the Economic Link requirement be modified so that all UK quota must be landed in UK ports.
 - That favourable access to foreign markets be maintained.
- b.lxiv The National Union of Rail Maritime and Transport Workers (RMT) submitted a free-form response to the consultation, which raised the following:
- It is vital to the interests of their seafaring members that future marine policy does not result in job losses in merchant shipping and ports.
 - They were disappointed that the consultation document did not acknowledge the self-employed status of the fishing workforce, with its concomitant risks to basic employment standards.
 - Welsh Government should call out bad regulatory and deregulatory practices that impact detrimentally on Welsh workers, particularly waivers from immigration regulations for the fishing industry, as has been seen in the offshore wind industry where waivers for the importation of foreign crew on lower and inferior employment terms to domestic workers have been granted.
 - The RMT advocated for the Welsh Government's future fisheries and marine policies to be set in this context and for their *Save Our Seafarers 2020* campaign to be incorporated into policy to protect Welsh seafarers from damaging deregulation.
- b.lxv The Isle of Anglesey County Council highlighted the Island's long-standing economic, environmental and cultural association with the sea, and argued the following:

- Every reasonable measure be taken to ensure the marine environment be actively managed, supported and safeguarded to ensure a sustainable and thriving future for Welsh rural coastal communities.
- It is important to establish a robust and transparent evidence base to strike a balance between conservation, fishing and development, and to understand the future impacts of Brexit.
- Sustainable development in line with Future Wellbeing goals and sustainable management of Natural resources is important but should not be to the detriment of local businesses.
- There is a need for contingency plans to mitigate [EU exit] impacts on Welsh seafood exports. New markets are a welcome possibility but require further exploration.

b.lxvi A private individual who is a keen recreational fisherman stated that the consultation document did not address recreational angling so submitted a freeform response instead of completing the form. He noted:

- Bass populations have been devastated by commercial over-exploitation and advocated managing bass on a recreational basis only, following the Irish model where commercial bass fishing is banned.
- Inshore gill netting should be banned as it targets bass as allowable bycatch.
- Commercial fishing is the least sustainable and least profitable use of resources, while recreational angling contributes more to the Welsh economy and is more sustainable. As such the consultation response should address angling.

b.lxvii In addition to standalone free-form responses several environmental organisation submitted a general summary in addition to their answers to the consultation questions. These included WEL, MCS, RSPB, The British Ecological Society (BES) and Wildlife Trusts Wales (WTW). What follows is not an exhaustive list of what was said but a reflection of the main themes and recommendations to emerge.

b.lxviii Criticisms of the consultation and Welsh Government, and recommendations regarding silo working

- There was criticism of the consultation document for focusing on Fisheries, rather than aiming to ensure a healthy functioning marine ecosystem, which also benefits the fishing industry.
- Organisations advised that the Welsh Government should move away from a sector based approach to an integrated ecosystem based approach, and that a culture of silo working is preventing more progressive and joined up ways of working, leading to a concern that Welsh Government will not be able to deliver on international and domestic obligations to ensure Welsh seas are well managed after Brexit.
- Concerns were raised that resource and capacity within Welsh Government's Marine Branch is a constraint on the ability to

sustainably manage the marine environment. The capacity of this team needs to be addressed.

- The economic importance of tourism, universities and local government to coastal communities was noted to be far greater than fisheries (£602M vs £24M) and therefore it was suggested that Welsh Government should be prioritising healthy, clean and biodiverse marine ecosystems, not a siloed approach on fisheries. The need was emphasised for Marine and Fisheries departments to work together, not separately, on the WNMP, Areas Statements and the Nature Recovery Action Plan.
- Several responses recommended following the example of Welsh Government's parallel consultation on farming post-Brexit, which moves away from directly supporting farming in favour of a joined up approach which emphasises sustainability and contains proposals which address the climate emergency.

b.lxix Recommendations around evidence base and gaps

- All fisheries management should be based on scientific evidence, and be effectively monitored and enforced.
- There are significant data gaps for marine management which must be addressed. Until then, a precautionary approach to management should be used.
- There should be more research into the impacts of Brexit on other sectors as well as fisheries, and the benefits of a well-managed marine environment should be researched, and has not been fully considered in the consultation.
- The development of the Marine Evidence Strategy for Wales was welcomed. It was recommended that it be clarified that this will focus on sustainable marine management.
- New fisheries in sprat and sand eel should not be opened and evidence should be sought on the impact of such fisheries.
- Evidence that climate change has a direct adverse impact on seabird prey species is mounting. Research is greatly needed to address evidence gaps associated with forage fish stocks and seabird declines in Welsh waters. This should be a key area of focus for the Marine Evidence Strategy.
- Any new quota should be allocated using an ecosystem-based system with consideration of foraging issues facing wildlife that are affected by climate change. Research needed to further understanding of food requirements of marine mammals and birds.
- There is a lack of evidence around UK Cetacean and Megafauna populations. Wales should have a Cetacean and Megafauna Action Plan to address this.
- Strategic Resource Area Working Groups should have an oversight body to examine cumulative impacts of economic and renewable energy ambitions in Welsh Waters. There is a need for research in cumulative impacts of renewables.

b.lxx Legislation

- The Well-being of Future Generations Act (Wales) 2015 and the Environment (Wales) Act (2016) should be embedded in any fisheries legislation going forward.
- Greater emphasis should be given to delivery under the Section 6 Duty within the Environment (Wales) Act.
- There was concern that the UK Fisheries Bill repeals crucial sustainability requirements as set out in CFP. The Minister indicated that a duty on Welsh ministers would be explored through this consultation, but this issue was not addressed in the consultation document. Welsh Government should address this issue as soon as possible.
- There was great concern and disappointment that Welsh Government explores alternative approach to Maximum Sustainable Yield (MSY) in the document. MSY is a feature of UN sustainable development goals and UNCLOS. Fishing in line with MSY and protecting habitats will be the best way to recover stocks and ensure the fleet is maintained.
- Any new scheme where new quota is allocated by Welsh Government must include environmental, social and economic criteria in line with the WFG Act and committed to precautionary approach and ecosystem based management.

b.lxxi Good Environmental Status (GES)

- The commitment by the Welsh Government to the Marine Strategy Framework for achieving GES was welcomed.
- UK Marine bird populations are not achieving GES. There is an urgent need for a Welsh Seabird Conservation Strategy.
- GES will not be achieved in Wales by 2020 and Welsh Government should direct policy development and post-Brexit efforts into addressing this and ensuring a healthy functioning marine system.
- Bycatch should be eliminated via approaches that include full documentation and control of total catches.

b.lxxii Stakeholder engagement

- Stakeholder engagement should include local coastal communities to a far greater extent.
- The relationship between academia and industry could be improved through the use of an inclusive and robust scientific data and evidence gathering process including industry and stakeholder engagement.

b.lxxiii Managing Welsh Seas

- An MPA strategy for Wales should be implemented. This enables sustainable management of natural resources, the well-being of future generations and should include a continuation of commitment to no loss of protection following Brexit.
- Damaging activities should be stopped, and this be enforced, in order to maintain and enhance MPAs in Wales.

- A new Marine Fisheries and Wildlife Service should be set up, to implement an ecosystems based approach to marine management and fisheries in Welsh Waters, as set out in the UK Marine Strategy.
- While Natural Resources Wales advocates a Welsh only Marine Area Statement, WTW proposes a regional seas approach instead.
- The proposals on adaptive management & aquaculture licenses within the consultation document are not detailed enough. They require their own consultation separate from this one.
- Form a Welsh Aquaculture Technical Group (following UK and EU groups) to assess need, market availability and to certify sustainability.

b.lxxiv Industry growth comments and recommendations

- A focus on driving forward economically profitable activities seems at odds with Welsh Government's commitment to sustainable development.
- Fishing opportunities and future funding opportunities should be managed in a way that maximises environmental protection, and social and economic development. Any additional quota should be allocated on basis of transparent social, economic and environmental criteria to incentivise the most sustainable fishing practices.
- Only consider increasing aquaculture if it can be done in environmentally responsible manner that fulfils commitments such as Sustainable development Goals and achieving GES under the Marine Strategy Framework Directive. Form a Welsh Aquaculture Technical Group (following UK and EU groups) to assess need, market availability and to certify sustainability.
- For the shellfish industry, to facilitate growth and give businesses certainty, ascertain both the carrying capacity and the cumulative capacity of the receiving water body, and the sensitivity of the habitat and any designations.