



Office for Environmental  
Protection  
Wildwood  
Wildwood Drive  
Worcester  
WR5 2QT

03300 416 581  
[www.theoep.org.uk](http://www.theoep.org.uk)

FMP Policy Team – Marine and Fisheries  
Department for Environment, Food and Rural Affairs  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

16 January 2025

Dear Sir/Madam,

### **Fisheries Management Plans – Defra-led consultations**

We write further to our [previous letter](#) of 29 September 2023, which provided the OEP's response to Defra's consultations on its six 'frontrunner' Fisheries Management Plans (FMPs). In our letter, we made several observations which we believe needed to be addressed for the finalised frontrunners, and the FMPs that followed, to deliver effectively on government's statutory targets and objectives for the marine environment.

As highlighted in our previous letter, we remain interested in this work and continue to urge that Defra give it priority in light of its existing commitments. Goal 6 in the Environmental Improvement Plan sets out the importance of FMPs to English fisheries by sustainably managing the harvesting of stocks and supporting the delivery of the appropriate objectives from the UK Marine Strategy. We also noted that FMPs are referenced as one of fifteen key policies that will deliver the Environment Act targets for biodiversity.

We are pleased to see meaningful improvements in the latest package of FMPs, released for consultation on 19 September 2024. Where previously we raised concerns about it often being difficult to identify specific actions that will have the effect of restoring or maintaining relevant fish stocks, the latest FMPs adopt a more standardised approach, are less discursive and set out actions that are clearly linked to each FMP goal. The use of specific performance indicators for tracking the implementation of these actions and/or management measures in the Cockle and Southern North Sea FMPs is especially welcome and something that we strongly encourage to be replicated in the remaining FMPs, particularly where the actions themselves are less prescriptive and difficult to measure.

We are also pleased to see an improved approach to applying the precautionary principle within the FMPs dealing with data-poor fisheries, where stock status is too uncertain to determine Maximum Sustainable Yield (MSY) as a basis for management. Where the frontrunner FMPs often failed to set out interim steps to ensure such stocks are sustainably managed whilst further data was being gathered to inform the development of long-term sustainability measures, the latest FMPs also place welcome emphasis on strengthening existing management measures to increase stock protection in the short term. The Southern North Sea Demersal Non-Quota Stock FMP is a good example of this, where precise short-term measures for limiting large capacity flyseining pressure are proposed in response to sustainability concerns for certain demersal non-quota stocks associated with flyseine catch.

Whilst these improvements are welcome, we continue to hold the view that some actions and measures set out in FMPs are poorly defined and lack the urgency required for government to achieve its objectives. For example, Objective 2 in the Queen Scallop FMP only proposes to seek opportunities for strengthening measures to increase stock protection following a review of existing measures. The FMP later proposes to “explore” potential options for introducing gear specifications.

We would reiterate our previous recommendation that the finalised FMPs place a stronger emphasis on how the goals “will” be achieved with more prescriptive language. Especially when it comes to short-term measures that will set the direction for achieving longer-term goals, we would already expect FMPs to be proposing measures against which implementation can be effectively assessed. Whilst we are pleased to see the improved approach to applying the precautionary principle, we would recommend that evidence of how the Environmental Principles Policy Statement duty has been applied is published, alongside the final FMPs.

Our comments are intended to support the continued strengthening of the plans as they enter their implementation phase. We will continue to monitor the development of FMPs. In light of recent amendments to the Joint Fisheries Statement, which extend the deadlines for FMPs that are yet to be published, it is even more essential that the final plans are published as soon as possible, and robust measures are identified, adopted and implemented at pace to ensure government’s plans for achieving its stated objectives and statutory targets are credible and coherent.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'A. B.', is located below the text 'Yours faithfully,'.

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Dame Glenys Stacey  
Chair  
Office for Environmental Protection

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