



The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Live Here, Love Here, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust, Causeway Coast & Glens Heritage Trust and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to: [Consultation on the Draft Fisheries Management for Non-Quota Shellfish \(NQS\) in Northern Ireland](#)

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The Northern Ireland Marine Task Force (NIMTF) welcomes the continued engagement from DAERA throughout the development of the Fisheries Management Plan (FMP). The iterative process, including working group discussions, has been valuable, and it is positive to see that the draft FMP reflects much of the dialogue and issues raised through this engagement.

We recognise that the draft sets out a clear framework of goals, supported by actions and an improving evidence base. However, while this provides a strong foundation, we consider that there remains an opportunity to strengthen the Plan by more clearly setting out the direction of travel for management.

NIMTF is broadly supportive of the direction of travel set out in the NQS FMP. However, in line with the principles set out by the Marine Conservation Society¹ (alongside *Pers. corres.*), we consider that further work is needed to strengthen the transition from evidence gathering toward the implementation of tangible management measures that will secure stock recovery and long-term sustainability.

While improvements in data collection and scientific advice are welcome, the current approach risks maintaining the process without delivering the level of intervention required to achieve meaningful outcomes. The FMP would benefit from setting out clear management options, both short- and long-term, with defined timelines, review points, and measurable performance indicators. This should include consideration of management tools such as effort controls, catch limits, and other adaptive measures, applied in line with the precautionary approach.

1 <https://www.mcsuk.org/what-we-do/marine-management/fisheries-and-aquaculture/fishing-and-fisheries/>

2 <https://www.afbini.gov.uk/article/inshore-fisheries>

3 <https://www.gov.uk/government/publications/king-scallop-fisheries-management-plan-fmp>

4

<https://www.gov.uk/government/publications/crab-and-lobster-fisheries-management-plan-fmp-for-english-waters/crab-and-lobster-fisheries-management-plan>

5 <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status/>

6 <https://nimtf.org/wp-content/uploads/2026/05/final-report-reducing-elasmobranch-bycatch-in-ni-ab.pdf>

A key gap remains in how scientific advice is translated into management. NIMTF would like to see a clearer pathway for how AFBI advice sheets² inform operational decision-making, ensuring that evidence directly drives management action. Given the current reliance on length-based indicators, there is a clear opportunity to develop this further by exploring how such indicators can be translated into practical management measures, supported by simulation modelling to test impacts on both stock recovery and fishery productivity.

We note that this approach is already being advanced in other UK FMPs. The King Scallop FMP (England and Wales)³ provides a strong example of how plans can move toward defined harvest strategies and control rules that respond to stock status. Similarly, the Crab and Lobster FMP for English⁴ waters sets out a suite of concrete management interventions, including size limits, effort-based controls, and spatial and seasonal measures, with a clear trajectory toward more structured management over time.

NIMTF also welcomes DAERA's decision to develop shellfish FMPs on a multi-species basis. Given the high degree of interaction between fisheries, with many fishers operating across multiple shellfish stocks, this approach represents an important step toward ecosystem-based fisheries management. It also strengthens the ability of fishers to plan activity, understand trade-offs, and respond to management measures within a connected system, rather than in isolation. This should be recognised as a key delivery component of an ecosystem-based approach.

To support this, NIMTF and its members recommends that the FMP:

- **Sets out clear management options**, including effort and catch controls, with defined timelines and review triggers
- **Establishes transparent pathways** for translating AFBI advice sheets into operational management decisions
- **Develops applied management measures** from existing length-based indicators (e.g. L_{opt} proxies)
- **Uses simulation modelling** to assess impacts of management options on stock recovery and fishery productivity
- **Focuses on measurable outcomes**, ensuring delivery of stock recovery, sustainable fisheries, and wider ecosystem health

Overall, strengthening this link between science, management, and implementation, while building on best practice from other UK FMPs and adopting a multi-species, ecosystem-based approach, would move the FMP beyond refining existing processes toward a more outcomes-focused framework, delivering measurable improvements in stock status and wider ecosystem recovery.

⁷ <https://www.legislation.gov.uk/nisr/2022/292/contents>

⁸

<https://www.daera-ni.gov.uk/sites/default/files/2026-01/Environmental%20Improvement%20Plan%20for%20Northern%20Ireland.pdf>

⁹ <https://www.legislation.gov.uk/apni/1966/17>

1. Evidence

Q1. Do you have any comments on the evidence used in the draft FMP (including any key gaps or additional evidence that should be considered)?

☒ Yes

☐ No

Please explain (optional):

NIMTF welcomes the improvements in the evidence base presented within the draft FMP, including the incorporation of ecosystem considerations and links to wider assessments. However, there remain important gaps that limit the ability to fully assess impacts and inform management decisions. The lack of inclusion or reference to the UK Marine Strategy indicators⁵ which are currently not achieving Good Environmental Status (GES) has not only been ill-recorded, but also omitted from within the overall document in terms of overarching assessments.

In particular, further evidence is required to better understand:

- Fishing effort distribution, gear use, and spatial intensity, which are critical for assessing environmental impact and pressure on stocks in relation to the UK Marine Strategy indicators
- Bycatch impacts, particularly for sensitive Protected, Endangered and Threatened Species frequently observed as bycatch utilising Remote Electronic Monitoring (REM) where feasible - See NIMTF's 'Reducing Elasmobranch Bycatch in Northern Ireland Report' (2026)⁶
- Mitigation effectiveness and improvement of exclusion devices within existing fishing intensities
- Benthic impacts of fishing activity, especially in relation to priority habitats and designated features
- Ecosystem interactions, including prey removal and links to wider food web dynamics
- Removal of abandoned or discarded ghost gear from seafloor to reduce marine litter presence
- How further data will help support marine conservation strategies and action plans

There is an element of concern that there is an assumption that having the plan in place will result in the optics that the fisheries are being effectively managed from publication - especially where fisheries overlap with MPAs, however enforcement is a core component of this FMP and whilst 9 out of 48 MPAs are subject to The Marine Protected Areas (Prohibited Methods of Fishing) Regulations (Northern Ireland) 2022⁷, a trawl was reported in 2026 within Strangford Lough leading to the potential decimation of the benthic feature - Horseshoe mussels - which partially led to the mass designations which Strangford has. A similar issue has been seen within the Outer Belfast Lough MCZ where 30% of the area had been damaged through large, commercial vessel anchor scars which persisted even after 9 months (2025) (DAERA, *pers. corres.*).

There is also a need to ensure that existing data held across organisations is more fully integrated into assessments. Strengthening the evidence base should be closely linked to management needs, ensuring that data collection is targeted and supports decision-making, rather than being an end in itself.

2. Stock Status / Assessment

Q2. Do you have any comments on the assessment of stock status and sustainability set out in the draft FMP?

☒ Yes

☐ No

Please explain (optional):

While the draft provides a useful overview of stock status, there are limitations in the current approach to assessing sustainability.

In particular:

- The current reliance on length-based indicators is helpful, but requires further development to support management decisions - greater support for MSY for all species alongside a range and threshold points with action triggers before they reach unsustainable levels
- Evidence suggests that some stocks may already be under pressure, highlighting the need for a more precautionary approach
- Further resource required to expand and integrate AFBI datasets into existing planning decisions and to integrate better management around ocean acidification
- Lack of comparison in data used between crabs and lobsters - e.g. only landings for crabs, whilst v-notched returns additionally used for lobsters

3. Policies / Management Approach

Q3. Do you agree that the draft FMP includes the right policies or overall management approach to achieve sustainable fisheries?

☐ Yes

☒ No

Please explain (optional):

While the framework is logical and evidence-led, it remains heavily focused on data collection and process, clarity is needed on how this will translate into tangible management interventions. Long-term monitoring should be accompanied by adaptive management measures, which continue to utilise ongoing monitoring to assess the effectiveness of measures. We emphasise that this FMP is a critical delivery mechanism for achieving the objectives of the Northern Ireland Environmental Improvement Plan⁸. As such, it must go beyond evidence gathering to set out clear, actionable management measures that will contribute to environmental recovery, sustainable use of marine resources, and the delivery of GES.

In line with MCS principles¹, the FMP should:

- Include clear management options (short- and long-term)
- Define timelines and review points
- Incorporate measurable performance indicators and triggers for action against a series of different indicators such as ocean acidification, sea level rises alongside temperatures to reflect importance as acknowledged within the Environmental Report
- Assess enforcement for the landing of berried Brown Crabs

Without these elements, there is a risk that the FMP maintains the current system rather than delivering measurable improvements in stock status and ecosystem health.

4. Objectives

Q4. Do you have any comments on the objectives in the draft FMP (for example, clarity, ambition, or whether they are achievable)?

☒ Yes

☐ No

Please explain (optional):

The objectives of the FMP are generally clear and aligned with the existing Fisheries Act 1966⁹ and wider policy frameworks. However, they could be strengthened in terms of ambition and measurability.

In particular:

- Objectives should more clearly define what successful outcomes look like (e.g. stock recovery, improved ecosystem condition)
- There is a need for quantifiable indicators linked to each objective
- Greater emphasis should be placed on delivery of ecosystem-based fisheries management

Strengthening objectives in this way would improve accountability and ensure that progress can be meaningfully assessed.

¹⁰

<https://www.daera-ni.gov.uk/news/minister-muir-introduces-fisheries-aquaculture-and-water-environment-bill-assembly>

¹¹ <https://www.daera-ni.gov.uk/consultations/public-consultation-plastic-pollution-plan-northern-ireland>

5. Actions

Q5. Do you have any comments on the proposed actions in the draft FMP (including whether they are appropriate and deliverable)?

X Yes

☐ No

Please explain (optional):

While the proposed actions are broadly appropriate, some specificity is required to ensure delivery. NIMTF considers that the FMP should move more clearly toward:

- Implementation of management measures within a set timeframe, rather than continued scoping - e.g. moving into delivery phase of an action as opposed to just monitoring
- Inclusion of near-term actions that deliver tangible change within existing timeframes
- Clear alignment between actions and intended outcomes across all species

6. Implementation, Monitoring and Enforcement

Q6. Are the proposals for implementation, monitoring, control and enforcement clear and workable?

☐ Yes

X No

Please explain (optional):

Proposals for monitoring and enforcement are a positive step, particularly in relation to the consideration of tools such as VMS for the under 12m fleet and improved compliance frameworks. However, there are concerns regarding practical delivery and effectiveness.

In particular:

- There is a need for greater clarity on enforcement capacity and resourcing, otherwise the plans being implemented will not be as effective within required timeframes - e.g. V-notching schemes must continue to be pursued to support ongoing management for Lobsters.
- Monitoring (including bycatch and environmental impact) should be strengthened and linked directly to management responses to support the UKMS on bycatch metrics (see Q3)
- Technologies such as REM should be considered more consistently across fisheries to support the role of enforcement and gain critical information
- Enforcement measures must be robust and act as a genuine deterrent for repeat offenders, including appropriate penalties - this should be supported and implemented through the modernisation of the draft Fisheries, Aquaculture and Water Environment Bill¹⁰.
- Alignment and mutual actions must be implemented between strategies and FMPs, such as the draft Plastic Pollution Plan NI¹¹ and updating the tagging requirements for creels and pots

A stronger link is needed between monitoring, compliance, and adaptive management responses.

7. Environmental Effects

Q7. Do you have any comments on the assessment of the environmental effects of the draft FMP, as set out in the Environmental Report?

☒ Yes

☐ No

Please explain (optional):

NIMTF welcomes the inclusion of environmental assessment within the draft FMP. This is a timely consultation. The interaction between the fishing industry and the marine environment, alongside a rapidly evolving geopolitical landscape and increasing pressures such as the expansion of marine renewable energy, is placing growing strain on an already dynamic and changing marine system. For both fisheries and nature conservation, greater clarity is needed to ensure the effective delivery of sustainability objectives. Uncertainty can act as a barrier to change, limiting the willingness of stakeholders to adopt new practices or management approaches. FMPs therefore present a critical opportunity to establish a clear and forward-looking framework for the future of fishing—one that supports sustainable livelihoods while protecting vulnerable species, habitats, and the wider marine ecosystem.

Key issues include:

- Ongoing impacts to benthic habitats and designated features
- Insufficient consideration of bycatch impacts on protected species
- Limited integration of wider pressures such as water quality, climate change, and cumulative impacts

The FMP should more fully reflect the requirement to deliver GES and adopt a genuinely ecosystem-based approach, ensuring that fisheries management contributes to wider marine recovery objectives.

8. Economic and Business Impacts

Q8. Do you have any comments on the financial implications of the draft FMP?

☒ Yes

☐ No

Please explain (optional):

NIMTF considers that the financial implications of the FMP should be viewed in the context of long-term sustainability.

A healthy marine environment underpins viable fisheries. Failure to invest in effective management now risks:

- Continued stock decline
- Reduced economic returns over time
- Increased costs associated with recovery

Investment in monitoring, enforcement, and management should therefore be seen as essential, and aligned with the delivery of sustainable fisheries and marine ecosystem recovery.

Economy and Environment should not be at odds with each other. If we do not get the marine environment in a good state, then this has a knock-on effect on the industries that rely on a healthy state for the marine environment.

9. Additional Comments

Q9. Do you have any additional comments on the draft FMP (including comments on specific sections not covered above)?

☒ Yes

☐ No

NIMTF welcomes the continued engagement from DAERA throughout the development of the FMP and recognises that the draft reflects much of the discussion to date. There is a critical opportunity to strengthen the Plan by setting out a clearer direction for management.

We note that this approach is already being advanced in other UK FMPs:

- The King Scallop FMP (England and Wales)³ sets out a pathway toward harvest strategies and control rules
- The Crab and Lobster FMP (English waters)⁴ identifies concrete management measures, including size limits and effort controls

Additionally, under point - 167 it states that UKMS GES is measured under 11 descriptors - this is incorrect. It is measured against 15 indicators and we are currently failing 13 of those. Many of these will be relevant for this FMP, including metrics which are associated with bycatch.

NIMTF would recommend that there needs to be the return of the NI FMP Advisory Board, of which it sat on. This would help to assess the overall cohesion and direction of the FMPs, whilst setting out clear overall objectives and also to keep a hand on the tiller to ensure we are progressing correctly. It is unsure if this will be involved within the Marine Nature Recovery Oversight Group or not.

NIMTF once again thanks DAERA for the opportunity to respond to the NQS FMP to ensure the sustainability of stocks within the marine environment and for the continued benefit of the fishing industry within sustainable parameters. We look forward to continuing to advocate on behalf of healthy, productive and resilient seas for Northern Ireland and appreciate that fisheries management is a statutory method to help achieve this.

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