

Response ID ANON-P6W3-G63E-5

Submitted to Consultation on the draft Joint Fisheries Statement (Ymgynghoriad ar y Cyd-ddatganiad drafft ar Bysgodfeydd)
Submitted on 2022-04-05 12:13:00

Joint Fisheries Statement Consultation / Datganiad Pysgodfeydd ar y Cyd

1 Would you like your response to be confidential? / Hoffech chi i'ch ymateb fod yn gyfrinachol?

No / Na

If you answered Yes to this question, please give your reason / Os mai'ch ateb i'r cwestiwn hwn oedd 'Hoffwn', rhowch eich rheswm.:

2 What is your name? / Beth yw'ch enw?

Name /Enw:
Rob Lennox

3 What is your organisation / Beth yw enw'ch sefydliad?

Organisation / Sefydliad:
Chartered Institute for Archaeologists and Council for British Archaeology

4 What is your email address? / Beth yw cyfeiriad eich e-bost?

Email / E-bost:
rob.lennox@archaeologists.net

5 From which nation are you based or do you have an interest in? (Select all that apply) / Ym mha wlad ydych chi'n gweithio neu y mae gennych fudd ynddi? (Dewiswch bob un perthnasol)

England (Lloegr), Northern Ireland (Gogledd Iwerddon), Scotland (Yr Alban), Wales (Cymru), Other (Arrall)

If other please specify (Arrall Manylwch):
International

6 Which is the following best describes your interest in the JFS (select one option that best describes your interest) / Pa un o'r canlynol sy'n disgrifio'ch diddordeb yn y JFS orau (dewiswch un opsiwn sy'n disgrifio'ch diddordeb orau)

Other (Arall)

Other (Arrall - Manylwch):
Cultural heritage & archaeology

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7 To what extent do you think the policies articulated in the draft JFS will achieve, or contribute to the achievement of, the fisheries objectives? Please explain your answer, with reference to specific content in the JFS where possible.

Answer here:

8 What are your views on the proposals for developing Fisheries Management Plans (FMPs)?

Answer here / Atebwch yma:

9 Are there any other areas of fisheries policy you think should be included in the draft JFS?

Answer here / Atebwch yma:

At present, the draft JFS does not recognise risks posed by fishing to underwater cultural heritage (UCH). We note that damage to features of archaeological or historic interest as a result of trawling constitutes a substantial risk to important UCH, including assets designated under the Protection of Wrecks Act 1973. This illustrates a need to introduce regulations which require the avoidance of known UCH for the purpose of protecting against adverse impacts occasioned by fishing activity.

The Fisheries Act (2020) enables this by giving Ministers the power to make provision by regulation for a 'conservation purpose' (s.36(1)), including "the purpose of protecting the marine and aquatic environment from the effects of fishing or aquaculture, or of related activities" (s.36(2)(b)). The act explicitly recognises that "the marine and aquatic environment" includes "features of archaeological or historic interest" in marine or coastal areas (s.52).

We note that the JFS should ensure that fishing practices do not compromise the overall achievement of GES through impacting on them. In this regard

we note the relevance of UK Marine Statement's requirements in paragraph 2.6.6 which states that 'heritage assets are a finite and often irreplaceable resource and can be vulnerable to a wide range of human activities and natural processes' and that they 'should be conserved through marine planning in a manner appropriate and proportionate to their significance'.

We urge the various devolved departmental teams to consult with their lead historic environment advisors (Historic England, Historic Environment Scotland, Cadw, and the Historic Environment Division) to discuss appropriate provision for UCH in the JFS.

10 Our consultation questions have been designed to be broad and hopefully have given you the chance to meaningfully feedback your views on the draft JFS. If you have further comments please comment here:

Enter text here / Teipiwch y testun yma: