

# **The North East Atlantic mackerel and Atlanto-Scandian herring Fishery Improvement Project**

**Application for Extension**

**North Atlantic Pelagic  
Advocacy Group**

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June 2024

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## Introduction & Background

**The North Atlantic Pelagic Advocacy (NAPA) Mackerel and Atlanto-Scandian Herring (ASH) FIP has been active since April 2021 and was originally planned to run for three years. Despite much effort on NAPA's part there has been limited progress by the Coastal States towards reaching a comprehensive sharing agreement for these two fisheries. With this in mind, and with the end of the FIP clearly defined, the NAPA Steering Committee commenced a review of its objectives and governance from late 2023.**

This review was comprehensive, lasting several months and considered NAPA's progress so far, and how different approaches or tactics in the future could elicit greater success towards achieving NAPA's goals. Within that process it was agreed that despite the obvious challenges in securing Coastal State agreement, there is still very much a need for NAPA, as the voice of the supply chain, to continue to advocate for improvements in the management of these fisheries. This is even more critical given there is a noticeable deterioration in the biomass of ASH.

The FIPs are the foundation of NAPA's work, and this document sets out in detail the proposed approach that NAPA will take under an extension to the mackerel and herring FIP. There is no departure from the original intention to design these FIPs as "policy FIPs", however there is greater focus on delivering more efficient, effective, and impactful actions building on the solid progress that NAPA has made over the last three years. Parallel to this request will be an extension request to the MarinTrust Blue whiting FIP.





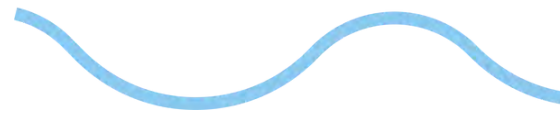


## Application for an Extension

The request seeks a two-year extension to the FIP from May 2024 to the end of April 2026. The three actions in the initial FIP will form the basis of this extension but the activities that will be delivered against these actions will be more targeted and in turn more impactful. In designing the extension, the focus has been on also ensuring NAPA can provide tangible evidence of progress and impact.

The tables below present an update of the original Mackerel and Herring FIP Actions.

The amendments/enhancements to the original actions are presented in blue. This document should be read in conjunction with the [spreadsheet](#) that provides the detail of tasks and sub-tasks, where in some cases more information is presented, particularly in relation to sub-tasks.



# Performance Indicator Action Plan for Action 1

<b>Action Number and Name</b>	1. Engagement to Ensure Robust Harvest Strategies Adopted and Implemented ( <a href="#">Maintain and enhance</a> )
<b>Action Goal</b>	NEAFC adopts and implements robust Harvest Strategies for NEA mackerel and ASH.
<b>Action Description</b>	<p>NAPA and NAPA partners engage with coastal states/NEAFC delegations, and other relevant stakeholders, in order to pursue NEAFC adoption, implementation and compliance with robust mackerel and herring harvest strategies that are responsive to the state of the two stocks, adoption of a HCR that is based explicitly on the harvest strategy and formally adopted target and limit reference points, and evidence that the HCR is meeting stock management objectives.</p> <p>This action is fundamental to the success of the FIP.</p> <p><a href="#">Additional task added around NAPA governance structure and delivery (April 2024).</a> Under the FIP extension the focus will be on reviewing and improving NAPAs governance arrangements so that it is easier for NAPA to be more agile and to take a targeted approach to its advocacy. An initial review of the objectives and structure of NAPA in late 2023 in order to identify whether there is a continuing need for the work of the Group. That comprehensive review reaffirmed the importance of NAPA’s role, but with a stronger focus. That focus should be built around a remodelled governance structure that facilitates the clear opportunities that exist from improved leverage within the NAPA membership, their business interests, and their networks. In turn, drawing on the importance of sourcing products from sustainable fisheries within the NAPA Members supply chain provides a customised approach that could enhance NAPA’s influence on the Coastal States’ delegations, NEAFC and other relevant parties. Within this improved action, and drawing on the increased leverage from within the NAPA membership, additional sub-tasks have been added on: <a href="#">Data and information analysis/evidence base development;</a> <a href="#">Communications strategy;</a> <a href="#">Stakeholders influence;</a> all of which are based on an enhanced engagement within the NAPA community, and improved integration of business (and other party) information in supporting NAPAs objectives.</p>

# Performance Indicator Action Plan for Action 1

<b>Expected Completion Date</b>	April 2026
<b>Priority</b>	High
<b>Estimated Cost</b>	£160K. Breakdown: £95K on Communications and Advocacy; £55K on policy capability; £10K on Meeting expenses
<b>Responsible Parties</b>	All FIP participants (NAPA Chair, Policy Lead and NAPA partners); NAPA Steering Committee and Sub-Groups; Research providers (e.g. Consultancies; Universities); MWC
<b>MSC PI(s) Addressed by the Action</b>	1.1.1, 1.1.2, <b>1.2.1</b> , <b>1.2.2</b> , 2.1.1, 2.1.2

## Performance Indicator Action Plan for Action 2

<b>Action Number and Name</b>	2. Dispute settlement framework and consultation processes (Maintain and enhance)
<b>Action Goal</b>	An effective and transparent mechanism for dispute resolution between the coastal states is in place to allow organised and effective cooperation between affected parties able to deliver outcomes consistent with meeting the requirements of Principle 1.
<b>Action Description</b>	<p>There is a mechanism in place for international cooperation in the fishery (the Coastal States Agreement), but it is not apparently completely effective. We will review the existing mechanisms to determine improvement needs and lobby a coastal state to initiate negotiations for an effective dispute resolution mechanism.</p> <p>Previously NAPA has identified a proposal by the EU to enter a change to the NEAFC Convention establishing procedures for the settlement of disputes. This proposal was adopted in 2004 yet remains to be entered into the Convention.</p> <p>The current dispute settlement agreement still needs to be adopted, and remains an action carried over from the original FIP. Added to this Action are tasks built around a review of that proposal (now 20 years old) to determine whether it remains appropriate, or whether a clearer and/or more detailed dispute settlement agreement may facilitate reaching a comprehensive sharing agreement across the Coastal States.</p> <p>A revised Dispute Settlement Agreement and the text within such an item provides another reference for influence in NAPA Communications and direct discussions with relevant parties. Additional sub-tasks added on targeted influence approaches therefore are associated with this modified task.</p>

## Performance Indicator Action Plan for Action 2

<b>Expected Completion Date</b>	April 2026
<b>Priority</b>	High
<b>Estimated Cost</b>	Included in the figure above.
<b>Responsible Parties</b>	All FIP participants (NAPA Chair, Policy Lead and NAPA partners); <a href="#">NAPA Steering Committee and Sub-Groups</a> ; <a href="#">MWC</a>
<b>MSC PI(s) Addressed by the Action</b>	<b>3.1.1, 3.1.2</b>



# Performance Indicator Action Plan for Action 3

<b>Action Number and Name</b>	3. Effective decision-making processes (Maintain and enhance)
<b>Action Goal</b>	Allocated TACs do not exceed the scientific advice.
<b>Action Description</b>	<p> <a href="#">Original Text</a>: At the international level, since 2013 there has been a lack of agreement on allocation of total stock TAC among the Coastal States, and the combined unilateral TACs that have subsequently been set have significantly exceeded the advised TAC in all years since this time.         </p> <p>           Whilst the Coastal States have not been able to agree on TAC allocation, there is evidence that the Coastal States have sought to respond to the ICES advice within their own unilaterally set TACs.         </p> <p>           NAPA and NAPA partners will engage with coastal states/NEAFC delegations, and other relevant stakeholders, in order to ensure that allocated TACs do not exceed ICES advice.         </p> <p> <a href="#">Since the original FIP was initiated, catches across all 3 NAPA species continue to be overfished at significant levels (consistently 20%-30% above advice).</a> </p> <p> <a href="#">Although NAPA has done much work to encourage Coastal States and interested parties to address this situation, little progress has been made, and there is a need for continued work on this Action, but with greater emphasis on understanding the positions of individual states and the markets within those states. To date NAPAs approach and supporting communication has been focused on collective responsibility of all Coastal States in achieving comprehensive sharing agreements. While this will remain a focus for NAPA, it will also direct its analysis and advocacy at understanding specific States positions, their actions, and whether they are blockers or facilitators in the discussions. This improved understanding will lead to a more targeted approach to influencing the parties involved. Additional tasks are built around the retrieval of intelligence from Coastal State negotiations and the use of this information for influencing decision-makers in a more focused and impactful manner.</a> </p>

## Performance Indicator Action Plan for Action 3

<b>Expected Completion Date</b>	April 2026
<b>Priority</b>	High
<b>Estimated Cost</b>	Included in the figure above.
<b>Responsible Parties</b>	All FIP participants (NAPA Chair, Policy Lead and NAPA partners); <a href="#">NAPA Steering Committee and Sub-Groups</a> ; MWC
<b>MSC PI(s) Addressed by the Action</b>	<b>3.2.2</b>



## Summary of FIP Actions

Note: Evidence is referred to within the FIP Actions as a foundation for the Actions, Tasks and Sub-Tasks. Where evidence is included, it is taken to be data and information from reputable sources (e.g. scientific or academic journals, books, conference proceedings, websites, news reports and NAPA Partners data) in relation to the sustainable management of these fisheries and their supply chains.



# Action 1: Engagement to Ensure Robust Harvest Strategies Adopted and Implemented

<b>Tasks / Milestones</b>	1.1. Review the structure of NAPA: Governance; Delivery; Funding with the aim to enhance engagement through streamlining of operations.
<b>Responsible (Lead)</b>	NAPA Chair; NAPA Policy lead
<b>Responsible (Supporting)</b>	NAPA Steering Committee; NAPA Species sub-groups
<b>Dates</b>	1 Apr 2024 - 30 Jun 2024
<b>Evidence of completion</b>	Meeting minutes; documentation; New governance structure published (e.g. on the NAPA website); reviewed / refreshed sourcing statements for the NAPA Members in place that are clear on the implications for sourcing / procurement if agreements are not reached within the lifetime of the FIP extension (to April 2026). Press releases.
<b>Outcomes</b>	Foundation for a more customised approach to influencing key decision-makers is in place, including strengthened sourcing statements; Coastal States Resolution in place and agreed by all parties, referring to agreement to fish annual quotas at or below scientific advice; Progress on resolutions within the 2-year timeline can be identified by agreement/s in place for several parties rather than all (e.g. within 12 months; all within 24 months). Progress on multi-annual agreements is clearly presented by Coastal States.

# Action 1: Engagement to Ensure Robust Harvest Strategies Adopted and Implemented

<b>Tasks / Milestones</b>	<p>1.2. Communication to continue with Coastal States representatives to promote adherence to exploitation levels consistent with meeting the requirements of Principle 1.</p> <p>Make more use of economic evidence and stock projections to enhance NAPAs advocacy work so that it is harder to ignore or dispute the risks that Coastal State inaction is creating for these fisheries and communities. Examples will include a socio-economic analysis of the impact on businesses of failure to reach agreements (e.g. jobs; revenue generation; support for remote communities; food security impacts). This material will be used in our engagement with CS representatives; Ministers, civil servants, and others; and to strengthen NAPA Partners’ members strengthen sourcing policies.</p>
<b>Responsible (Lead)</b>	<p>NAPA Policy Lead; NAPA Chair; MWC</p>
<b>Responsible (Supporting)</b>	<p>NAPA Partners; NAPA Steering Committee; NAPA Species sub-groups</p>
<b>Dates</b>	<p>1 May 2024 - 30 Apr 2026</p>
<b>Evidence of completion</b>	<p>Targeted, focused advocacy that is based on scientific and economic evidence will be more impactful in discussions with CS representatives and NEAFC. NAPA Communications are enhanced with the addition of specific and up-to-date data and information. Expanded evidence base provides a broader resource for the NAPA Partners to enhance their own communications. Catching Sector communications reflect NAPA's own communications and aims.</p> <p>Targeted, focused evidence base will be more impactful in discussions with CS representatives and NEAFC. NAPA Communications are enhanced with the addition of specific and up-to-date data and information. Expanded evidence base provides a broader resource for the NAPA Partners to enhance their own communications.</p>

# Action 1: Engagement to Ensure Robust Harvest Strategies Adopted and Implemented

*1.2 continued*

## Outcomes

In advance of the 2026 Coastal States negotiations and NEAFC meetings, the catching sector aligns on calls to action that reflect NAPA priorities. Catching sector influences decision-makers in a synergistic manner to NAPA. More collaborative and targeted engagement with the catching sector should help build a coalition of support and enhance the reach and effectiveness of NAPAs advocacy work. Catching sector organisations publicly endorse the approach taken by NAPA.

2024 and 2025 NEAFC Annual Meetings show clear examples of progress towards a comprehensive sharing agreement; as above: Progress on resolutions within the 2-year timeline can be identified by agreement/s in place for several parties rather than all (e.g. within 12 months; all within 24 months).



# Action 1: Engagement to Ensure Robust Harvest Strategies Adopted and Implemented

<b>Tasks / Milestones</b>	1.3. During negotiations for TACs and sharing arrangements, arrange meetings with catching sector (“roundtable”) to encourage a management solution. Broadened catching sector engagement through more targeted and more frequent meetings. Also exploring opportunities for collaborative advocacy.
<b>Responsible (Lead)</b>	NAPA Policy Lead; NAPA Chair; MWC
<b>Responsible (Supporting)</b>	NAPA Partners; NAPA Steering Committee; NAPA species sub-groups
<b>Dates</b>	1 May 2024 - 30 Apr 2026
<b>Evidence of completion</b>	NAPA shall provide documented evidence of all related correspondence, analyses, actions, meetings, representations etc. In advance of the 2026 coastal states and NEAFC meetings, the catching sector has been stimulated by NAPA to align on calls to action that align with NAPA priorities. Catching sector communications clearly show echoes of NAPA's communication strategy, as well as evidence of reaching different audiences.
<b>Outcomes</b>	<p>Catching sector influences decision-makers in a synergistic manner to NAPA. More collaborative and targeted engagement with the catching sector should help build a coalition of support and enhance the reach and effectiveness of NAPAs advocacy work.</p> <p>More collaborative and targeted engagement with the catching sector should help build a coalition of support and enhance the reach and effectiveness of NAPAs advocacy work.</p> <p>Improved understanding of Catching sector positions and the opportunity to extend NAPA messaging through this network as they have their own liaison and discussions with CS Representatives)</p>

# Action 1: Engagement to Ensure Robust Harvest Strategies Adopted and Implemented

<b>Tasks / Milestones</b>	<p>1.4 Lobby all parties in seeking a joint solution within the framework of a long-term management plan highlighting market consequences of inaction. Use our economic analysis and individual business case studies to highlight the impact of inaction on businesses and wider communities. Activity will also highlight the impact of food security and climate change implications from sourcing from other fisheries.</p>
<b>Responsible (Lead)</b>	<p>NAPA Policy Lead; MWC; NAPA Chair</p>
<b>Responsible (Supporting)</b>	<p>NAPA Partners; NAPA Steering Committee; NAPA species sub-groups</p>
<b>Dates</b>	<p>1 May 2024 - 30 Jun 2025</p>
<b>Evidence of completion</b>	<p>NAPA shall provide documented evidence of all related correspondence between the market and decision-makers. NAPA partners continue to publish clear positions on sourcing NEA mackerel and ASH including consequences of FIP failure. Press Releases across NAPA networks extend through to Catching Sector representatives and beyond.</p>
<b>Outcomes</b>	<p>NAPA partners continue to publish clear positions on sourcing NEA mackerel and ASH including consequences of FIP failure. Improved understanding of Catching sector positions and the opportunity to extend NAPA messaging through this network as they have their own liaison and discussions with CS Representatives). Comprehensive sharing agreement(s) are achieved either partially or in full, and published by the Coastal States and NEAFC.</p>

# Action 1: Engagement to Ensure Robust Harvest Strategies Adopted and Implemented

<b>Tasks / Milestones</b>	1.5. 6-monthly Steering Group Reviews of Progress against actions.
<b>Responsible (Lead)</b>	NAPA Chair; NAPA Policy Lead; Steering Committee
<b>Responsible (Supporting)</b>	All NAPA Partners
<b>Dates</b>	31 Oct 2024 - 1 May 2025
<b>Evidence of completion</b>	Minutes, reports, and other documents show clearly NAPA progress on topics that are directly relevant to the establishment of a comprehensive sharing agreement for the Coastal States on mackerel and herring.
<b>Outcomes</b>	<p>Starting from April 2024, and continually over the period of the following 24 months, there is clear evidence of progress towards a sharing agreement. This may be through, for example, the establishment of partial sharing agreements (bilateral/trilateral) that are in place in 2024/2025, moving towards a full agreement in 2026.</p> <p>Formal publication of such an agreement is made by the Coastal States and NEAFC.</p>

## Action 2: Dispute settlement legal framework and consultation processes

<b>Tasks / Milestones</b>	<p>2.1. NAPA reviews and produces a document summarising the coastal states' and NEAFC's dispute settlement protocols.</p> <p>More focused engagement with NEAFC on the development of a more detailed dispute settlement agreement; Review of the 2004 EU Proposal and its relevance to the current situation; possible/likely provision of suggested text for Coastal States to reach agreement in disputed quota allocations.</p>
<b>Responsible (Lead)</b>	<p>NAPA Policy Lead; NAPA Chair; MWC</p>
<b>Responsible (Supporting)</b>	<p>NAPA Partners ; NAPA Steering Committee; NAPA species sub-groups</p>
<b>Dates</b>	<p>1 May 2024 - 21 Dec 2025</p>
<b>Evidence of completion</b>	<p>Evidence of NAPA's engagement with NEAFC on the Dispute Settlement Agreement which shows progress over time. Publication of a Draft and/or final Dispute Settlement document. This shall clarify the approach to be taken where there is obvious intransigence in the position of one or more Coastal States in reaching a comprehensive sharing agreement. Draft document tabled at NEAFC meetings and included in documentation (e.g. in an annex) for discussion.</p>

## Action 2: Dispute settlement legal framework and consultation processes

*2.1 continued*

### Outcomes

Formal publication of partial, or full sharing agreements between Coastal States that achieve, or show progress towards, fishing at levels consistent with scientific advice.

Ensure the March 2017 draft “Guidelines for Coastal State Consultations in the North East Atlantic” adopt the following text relating to dispute resolution (NEAFC, 2017; Chapter 9 – Mediation, para 25) If agreement on a Framework Arrangement is not reached, the coastal States should consider engaging a mediator. Any decision on engaging a mediator, including the choice of the person and the terms of reference of his/her role, should be made by consensus.

Dispute Settlement Agreement protocols are included within the agenda of NEAFC WG on the Future Development of NEAFC meetings; this work delivers an agreement that is signed off by all parties in NEAFC. There is to be clear evidence of moving towards this outcome over time.

## Action 2: Dispute settlement legal framework and consultation processes

<b>Tasks / Milestones</b>	<p>2.2. Lobby a coastal state (i.e. UK) to initiate negotiations for a mechanism for cooperation and dispute resolution between the Coastal States which is effective in agreeing an appropriate management mechanism consistent with the management plan.</p> <p>Expanded to include all CSs and the Chairs of each of the pelagic species WGs in particular in a manner that extracts specific information relating to their positions and provides a detailed overview of blockers and enablers in the negotiations. This detail will support a targeted approach to advocacy.</p>
<b>Responsible (Lead)</b>	<p>NAPA Policy Lead; MWC</p>
<b>Responsible (Supporting)</b>	<p>NAPA Partners; NAPA Steering Committee; NAPA species sub-groups</p>
<b>Dates</b>	<p>1 May 2024 - 30 Jun 2025</p>
<b>Evidence of completion</b>	<p>By the end of Q1 2025, NEAFC shall provide a transparent mechanism for the resolution of legal disputes which is considered to be effective in dealing with most issues and that is appropriate to the context of the fishery. This draft document will enable agreements between Coastal States at bilateral and multilateral levels. NEAFC is seen to be working actively in support of achieving an overall comprehensive agreement for the NEA pelagic stocks / is seen to be aligned with NAPA's goals.</p>



## Action 2: Dispute settlement legal framework and consultation processes

*2.2 continued*

### Outcomes

By the end of 2024, NEAFC shall establish the Working Group (or similar) on Allocation Criteria, and this is communicated by NEAFC.

By the end of Q1 2025, NEAFC shall provide a transparent mechanism for the resolution of legal disputes which is considered to be effective in dealing with most issues and that is appropriate to the context of the fishery.

By the end of 2025, NEAFC shall impose binding arrangements, rather than guidelines, for contracting parties, which results in an agreement that ensures adherence to the harvest strategy by the parties prosecuting the fishery.

## Action 3: Effective decision-making processes

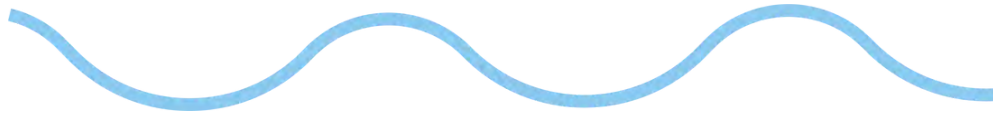
<b>Tasks / Milestones</b>	<p>3.1. Communication to continue with Coastal States representatives to promote delivery of exploitation levels consistent with meeting the requirements of Principle 1.</p> <p>More specific intelligence gathering on factors related to CS representatives' positions. For example, where States are known to be consistently blocking negotiations, then NAPA will prioritise communications accordingly to those positions in a manner that will carry improved chances of impact and influencing the pathway to a successful agreement.</p>
<b>Responsible (Lead)</b>	<p>NAPA Policy Lead; NAPA Chair; MWC</p>
<b>Responsible (Supporting)</b>	<p>NAPA Partners; NAPA Steering Committee; NAPA species sub-groups</p>
<b>Dates</b>	<p>1 May 2024 - 30 Apr 2026</p>
<b>Evidence of completion</b>	<p>Publication of summary documents on positions available: 2024; 2025.</p>
<b>Outcomes</b>	<p>Partial, or full sharing agreements between Coastal States that achieve, or show progress towards, fishing at levels consistent with scientific advice.</p> <p>By 30/4/26, coastal states are setting TACs that do not exceed ICES advice and unilateral TACs are not being set.</p> <p>Agreements are published formally, and these present solutions on an annual and multi-annual basis.</p>

## Action 3: Effective decision-making processes

<b>Tasks / Milestones</b>	<p>3.2. Engagement with national pelagic catching sector representatives in order to extend NAPAs reach and develop enhanced influence from within the supply chain. Should the Catching Sector in all or some Coastal State nations decide to go down the route of an MSC ITM approach, NAPA will also support this. (NAPA has already been in discussions on this topic for several months)</p>
<b>Responsible (Lead)</b>	<p>NAPA Policy Lead; NAPA Chair MWC</p>
<b>Responsible (Supporting)</b>	<p>NAPA Partners; NAPA Steering Committee; NAPA species sub-groups</p>
<b>Dates</b>	<p>1 May 2024 - 21 Dec 2025</p>
<b>Evidence of completion</b>	<p>The catching sector has been prompted by NAPA to align on calls to action that align with NAPA priorities on TACs not exceeding advice. Press articles show clearly that the Catching Sector is in alignment with NAPA's goals.</p>
<b>Outcomes</b>	<p>By Q4 2024, and showing continual progress thereafter, the Catching sector is seen to influence decision-makers in a synergistic manner to NAPA. Communications show clear evidence of progress towards a comprehensive sharing agreement.</p>

# Acronyms

CS	Coastal States
FIP	Fishery Improvement Project
MWC	Mindfully Wired Communications: NAPA's Comms and Advocacy team
NAPA	North Atlantic Pelagic Advocacy Group
NEAFC	North East Atlantic Fisheries Commission





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