

FMPs Team
Scottish Government
FMPs@gov.scot

Date: 04.03.2026

Dear FMPs Team

RE: 11 Proposed Joint UK Fisheries Management Plans (FMPs) for Demersal Fish Stocks – Public Consultation Response

Historic England has responded previously as a statutory consultee with regard to Demersal Fish Stocks FMPs (six stocks in English waters) as reflected in our earlier response (see *Appendix F, Strategic Environmental Assessment [SEA] Environmental Report*). Historic England is pleased to be able to comment further under the current public consultation regarding the below listed six FMPs:

- Proposed North Sea and West Coast of Scotland Haddock FMP
- Proposed Northern Shelf Cod FMP
- Proposed North Sea and Eastern Channel Whiting FMP
- Proposed North Sea and West of Scotland Saithe FMP
- Proposed Northern Shelf Hake FMP
- Proposed North Sea and West of Scotland for Monk/Anglerfish FMP

Historic England is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended via the National Heritage Act 2002 to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. Historic England also provides advice in relation to English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act (MCAA) 2009.

Proposed Whitefish/Demersal FMPs x6:

The importance of the cultural heritage of fishing is acknowledged in the opening sentence of the Joint Fisheries Statement (JFS). Whilst we recognise the passing reference made in the *Proposed North Sea and West Coast of Scotland Haddock FMP* in relation to the cultural heritage of fishing, (page 32) and *Proposed Northern Shelf Cod FMP* to the respective fish stock (page 6) being of cultural importance, we noted the absence of any direct reference to cultural heritage within FMP policies and actions, an omission also recognised in the *SEA Environmental Report*. Historic England is therefore supportive of the following two recommendations made in the Non-technical Summary, *SEA Environmental Report* (page 6), particularly:

- *Future iterations of the Whitefish/Demersal FMPs should consider how they can develop the cultural heritage of each fishery and how fisheries management can contribute to reducing potential negative interactions with marine heritage assets.*

- *Future iterations of the Whitefish/Demersal FMPs should consider how fisheries management can contribute to reducing potential negative interactions with submerged prehistoric landscapes or seascapes.*

SEA Environmental Report: 3. Environmental Baseline

In our previous comments, we agreed that fishing activities that target whitefish/demersal stocks have the potential to cause physical disturbance to the seabed and, therefore, to heritage assets in and on the seabed. Further, we highlighted that interaction between fishing gear, Abandoned, Lost or Discarded Fishing Gear (ALDFG) and marine heritage assets. We are therefore pleased to see the sections on *Cultural Heritage* and *Landscapes and Seascapes* recognising potential disruption to archaeological/submerged prehistoric landscapes, within the scope of the overall *SEA Environmental Report*. Acknowledgement of our international obligations within the SEA Environmental Report, through the *Convention for the Protection of the Archaeological Heritage of Europe* and *Council of Europe Landscape Convention*, underlines the importance and role cultural heritage plays within the UK Marine Environment.

In relation to section 3: Environmental Baseline, of the *SEA Environmental Report* (pages 22-23) Historic England welcomes the exploration of how fishing can have both positive and negative impact on heritage assets. We note reference to Historic England's *Fishing and the Historic Environment* report (2014), alongside the following concern raised in the *SEA Environmental Report* (page 23): "*given the anecdotal nature of many of these interactions, a comprehensive assessment of the extent of interactions and their impacts is currently not available for Scottish, English, Northern Irish and Welsh waters*". Historic England is keen to discuss this evidence gap further with Defra, as recognised in in *Section 6. Proposed Measures to Reduce Significant Negative Effects* (page 55). As part of collaborative cross-agency working, we also look forward to:

- Considering how measures could protect the marine historic environment for incorporation into fisheries management for future iterations.
- Better understanding the extent of prehistoric deposits like moorlog [i.e. prehistoric landsurfaces and deposits], how they are changing, and how efforts to conserve them from the impacts of fishing them might contribute to climate change mitigation and adaptation.

Further Contact:

Historic England is also pleased to see Defra's acceptance of our invitation to discuss the points below as outlined in our previous Whitefish/Demersal FMP comments. We look forward to hearing from our Defra colleagues in due course to explore the below points extracted from the *SEA Environmental Report, Appendix F* (page 188):

[Point 9]

- How cultural heritage and landscape/seascape might be brought within UK MS, and/or how suitable mechanisms to support each FMPs can be developed for cultural heritage and landscape/seascape alongside the UK MS.

- What other sources of evidence will be used to cover cultural heritage and landscape/seascape in the Environmental Reports.

[*Point 10*]

- What additional measures are being introduced to address the lack of assessment the risks and impacts of fishing activities on cultural heritage and landscape/seascape conducted or are ongoing as part of the UK's obligations under legislation relating to Marine Protected Areas (MPAs) etc.

We look forward to continued future involvement in developing and implementing FMPs.