

The Fishermen's Association of Bermuda is appreciative of the recent calls to action from conservation and scientific circles regarding the proposed Marine Spatial Plan as developed by BOPP.

FAB also calls to Government to immediate action, for recreational licensing, data collection, improved enforcement, education outreach, all of which has been requested for decades. Marine spatial planning can and should be a part of all that, but closures to fishing must be approached in a different manner than currently proposed.

Problems with the current proposed fishing closures:

First and foremost, when we say there was no public consultation, we mean very specifically the commitment for 20% full protection (including closure to fishing) which was promised in the 2019 MOU between Government, Waitt and BIOS. We understand there was a lot of input into the plan AFTER that framework was pre-decided, but that goal was never up for any negotiation.

There's a lot of global science on MPA's, but when one drills down into it, it is anything but generic. Local context matters! There are very specific things that make MPA's effective.

- Number one factor in successful MPA's is buy in from local fishing industry.
- Successful MPA's are large, contiguous, and far from other forms human impacts. These proposed closures are not, and will still be impacted by climate change, pollution, commercial shipping, and potential development.
- Adaptive management. (In 2019, a DENR bait study showed that current area closures to net fishing provided some minimal protection for particular bait species that are very plentiful, and zero protection for bait species of concern. Despite the fact that DENR concluded these closures are totally ineffective, they are still in place. Government's track record of adaptive management is abysmal.)
- Rate of improvement is directly correlated to severity of current impact. DENR has stated to us in written correspondence that current fishing on our platform is at or below the maximum sustainable yield. That means we are NOT currently fishing at damaging levels. We do believe DENR has every reason to be conservative when making that statement, so if they have stated it, it must be true. It just doesn't fit their current narrative, so they haven't said it very loudly.
  - Look at the proposed offshore closures. How much fishing currently happens out there by local Bermudian boats (make that "boat" singular). The current impact in that vast area is statistically zero. If you remove that fishing impact, the improvement is also zero. (If there's foreign boats there now, that's already illegal, if we can't enforce it now, we won't be able to enforce it with a new closure.) We can protect those offshore areas from

mining and development while leaving them open to small scall, local based fishing. Closing these areas to Bermudian fishers will yield ZERO measurable improvement.

- It's really nice that BOPP tried to choose areas on the platform where they believe there's minimal fishing, in order to appease us. However, if there's minimal fishing there, the removal of that fishing impact means that any improvement will also be minimal. But as a fisherman, every single dollar counts. So why close these areas, yielding minimal ecological improvement, when the cost is our willing cooperation on every other aspect of marine policy, which could yield actual real results?

Fishermen are not saying "no" to all marine spatial planning. We aren't even saying "no" to MPA's. What we are saying is if we are going to close areas to fishing specifically, let's agree on the methodology for making those decisions so we go into them in a cooperative way that will yield real results, like the red hind grounds and grouper boxes.

Here's what we DON'T want to happen.

- MPA's go into place, fishermen get closed out of areas that are particularly important in winter months when every dollar counts, and the precedence is set for this methodology of choosing more areas in the future.
- Commercial fishers are the primary target for enforcement, with the most to lose (fines, loss of license).
- Government, Waitt and BIOS get a photo op for putting this plan into place, pats themselves on the back for a job well done, and urgency for real fisheries management (recreational licensing, data collection, stock analysis) goes back to the level it's been at for the past 30 plus years, which has been woefully inadequate.
- Climate change, pollution, commercial shipping, other impacts continue to affect these "protected" areas.
- Commercial fishers feel they've been screwed over for very little ecological benefit, leading to further mistrust and lack of cooperation in scientific research, the divide between fishers and scientists deepens.
- Commercial fishers lose faith in the system, drop their licenses, catch fish anyway and sell on the open market with no repercussions, all data collection and cooperation is lost (this is already happening).

I think we can all agree that we do not want to put into place something that sounds really nice but in actual practice is totally ineffective in advancing the goals of sustainable ocean use and conservation that we really do all agree on.

Why are the things we all agree on held for ransom while this one aspect of marine spatial planning gets discussed? Please work with us, not against us!