



Department
for Environment
Food & Rural Affairs

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Consultation on the implementation of the demersal landing obligation in England

Summary of responses

July 2015



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Background

The Common Fisheries Policy (CFP) is the European Union's instrument for the management of fisheries and aquaculture. EU Member States and the European Parliament agreed a historic deal to reform the CFP in December 2013. The new CFP basic regulation ([Reformed CFP Regulation](#)) entered into force on 1 January 2014.

The regulation makes fundamental changes to the way that Europe's fisheries are managed, with the aim of managing fish stocks sustainably to ensure a prosperous fishing industry and a healthy marine environment. One of the most significant changes relates to the phased introduction of a landing obligation, also known as a discard ban, which prohibits the discarding of fish. The pelagic landing obligation came into force on 1 January 2015 following public consultation. The demersal landing obligation will be phased in between 2016 and 2019.

Some elements of the landing obligation are set out in European Regulations but we have flexibility in how we implement them, both as a Member State and nationally.

As a Member State the UK works with other Member States across our shared fisheries in regional groups to propose joint recommendations on fisheries management measures to the European Commission. These joint recommendations include decisions on what fisheries to phase in when, within the overall timeframe; what exemptions are to be allowed and any changes to the minimum conservation reference sizes (MCRS) of fish which impact on the markets they can be sold.

National decisions relate to the quota management and control and enforcement rules: how we allocate any quota uplift; manage the interspecies and banking and borrowing flexibilities and our approach to monitoring, control and surveillance.

Introduction

On the 23 January the Government issued a consultation on the implementation of the demersal landing obligation in England. The consultation and supporting documents are available at: <https://consult.defra.gov.uk/fisheries/demersal-landing-obligation-in-england>.

The consultation set out some of the potential approaches by which we could implement the demersal landing obligation in England. We tried to keep the consultation as broad as possible gathering views on these approaches as well as any additional options highlighted by respondents.

The consultation closed on the 31 March 2015. In total we received 75 responses.

During the consultation period we also hosted 16 stakeholder events across England (Annex A). These were attended by over 200 people. The themes that emerged at the

stakeholder events often reflected those in written responses and have been considered alongside them.

The consultation responses have already contributed to Member State negotiations and will continue to do so. The responses to the consultation, summarised in this document, will be used to inform Defra's approach to implementation which will be published, along with appropriate guidance, in the autumn.

Summary of responses

Overview of responses

We received 75 responses in total. Table 1 illustrates the breakdown of consultation responses by sector. See Annex B for a list of the organisations that responded.

Table 1: Breakdown of consultation responses by sector

Sector	Number of responses
Business – Catching sector	41
Business – Processing Sector	4
Business – Other	8
Delivery Body	6
Environmental NGO	8
Interested member of the public	7
Other	1
Total	75

We received 32 responses on line via our Citizen Space page, 36 via email to cfp.consultation@defra.gsi.gov.uk and 7 by post.

We consulted on five key areas of implementation:

1. Phased introduction of the landing obligation;
2. Quota management;
3. Exemptions;
4. Catch management; and
5. Monitoring and enforcement.

Phased introduction of the demersal landing obligation

Q1. Which approach to the landing obligation is the most proportionate and effective? Please explain why and provide any supporting scientific, economic or environmental evidence.

Between 1 January 2016 and 1 January 2019 at the latest all fishing vessels will need to comply with the requirement to land all catches of demersal quota stocks (subject to any agreed exemptions).

The CFP basic regulation provides for the phasing in of the landing obligation for demersal species; the text provides some limited flexibility to tailor its introduction. We consulted on how best to do this.

We proposed three potential phasing options, welcoming any alternative approaches.

1. The introduction of the landing obligation in 2016 for all species listed,¹ in their defined fisheries, with all other quota species caught in those fisheries phased in between 2017 and 2019 (fisheries approach).
2. The introduction of the landing obligation in 2016 for only the listed target species, in the defined fisheries, with the remaining quota species phased in between 2017 and 2019 (targeted species in a fishery approach).
3. The introduction of the landing obligation in 2016 for all catches of a small number of the species listed regardless of their defined fishery, with the other species listed in the regulation phased in between 2017 and 2019 (species approach).

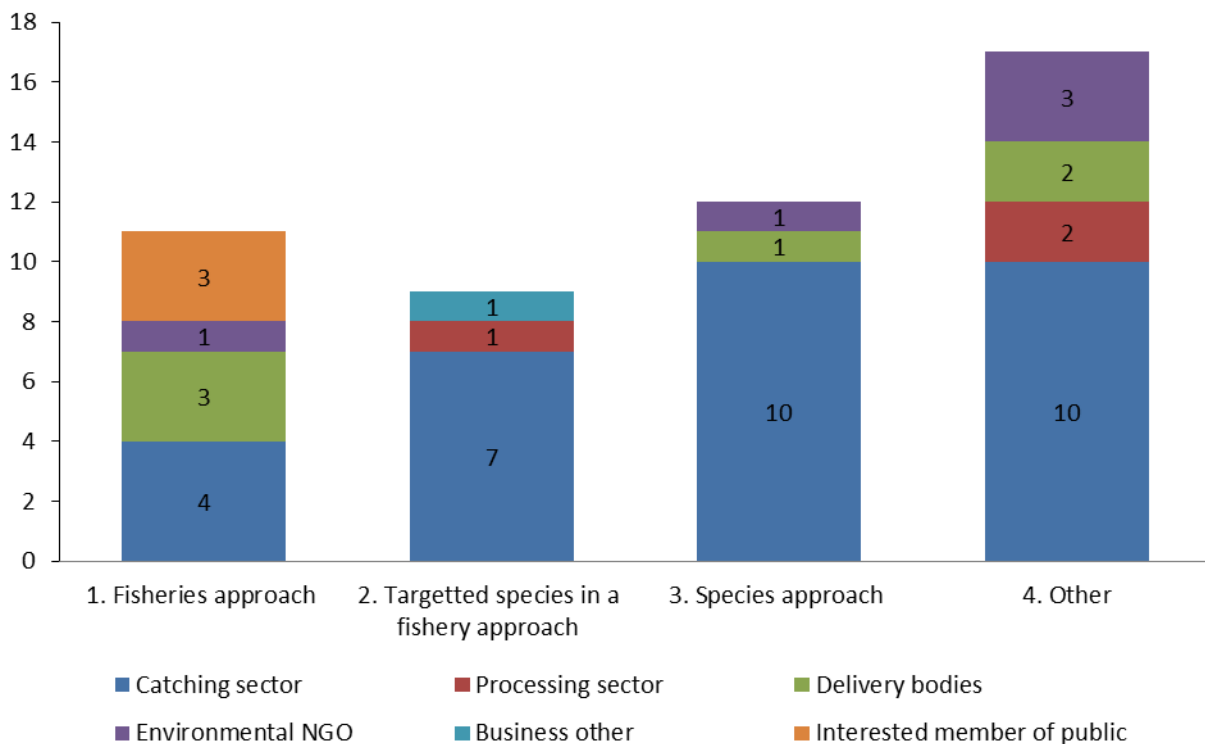
There were 49 responses to this question. Of the three options we provided, Option 3, a species based approach, was, narrowly, the most popular, in particular with the catching

¹ The basic regulation lists specific fisheries to be introduced in North Western waters and the North Sea: cod, haddock, whiting, saithe, *Nephrops*, common sole, plaice and hake. Additionally Northern prawn is included for the North Sea only.

sector; one response stated that it was important to introduce it slowly so we can learn as we go. A respondent in support of Option 2 used similar justification, stating that it would give fishermen time to adapt. Option 1 was the least popular choice amongst the catching sector however it had significant support from the delivery bodies and members of the public. The comments received in support of Option 1 included those which stated that it was a straightforward and simple approach which would make enforcement easier to carry out.

Comments received within the ‘Other’ category included three environmental NGOs who emphasised the need to avoid a complex and confusing transitional period whilst the landing obligation is introduced. Two of the NGOs went further and stated that a roadmap of phasing should be developed indicating what should be introduced in each of the years between 2016-2019. Three respondents stressed the need to phase in the landing obligation in order to give the industry time to adapt. Another two responses highlighted the crucial role effective communication will play in successful implementation of the landing obligation. One stressed the importance of making fishermen aware that all quota species will have to be landed by 2019, so that there is a clear incentive for the fishing industry to take advantage of the phased introduction of the landing obligation to adapt and prepare.

Figure 1: Preferred approach to the phased introduction of the demersal landing obligation



Q2. Are there any other approaches to the implementation of the landing obligation which you think will be more proportionate and effective? Please explain your answer and provide any supporting economic or environmental evidence.

We had 38 responses to this question of which the majority indicated that there were other approaches to be considered for the phasing in of the landing obligation.

Table 2: Question 2 breakdown of responses

Consultation response	Number of responses
Yes	23
No	15
Total	38

The majority of the ‘Yes’ responses provided additional views, but did not advocate for any particular alternative option. Two responses called for the phasing to be more ambitious. One response called for a hybrid model between the species approach and the targeted fishery approach. Another suggestion was to break down North Western Waters (NWW) into its different areas to reflect the different fleets and fisheries operating there, stating that a one size fit all approach would not work in a mixed fishery.

Of those who said ‘Yes’, four respondents indicated their concern about the inclusion of the small scale fleet and their ability to cope under the discard ban, instead advocating for their exemption or the phasing of the landing obligation to start with the larger vessels. One suggested that the obligation should be proportionate to the vessel size, gear used and license type.

Of those who responded ‘No’ the majority did not provide any additional comments, however two responses were content that the three options proposed covered the appropriate issues.

Regional meetings

The regional meetings with fishermen were very useful in understanding local fleet characteristics; identifying the difficulties some fishermen would have with some species under the landing obligation. It was helpful in identifying regional and fleet segment ‘choke’ species. We have taken local observations and comments into consideration and used these as appropriate within Member State negotiations to try and ensure we introduce a workable landing obligation.

Government implementation update

This issue of phasing has been discussed at the Member State regional groups in order to identify a common approach across our shared fisheries so that all fishermen are treated fairly during the implementation.

A species based approach was put forward by the Advisory Councils, which is made up of Member States' fishing members and other interest groups, with a 70/30 split. However it was viewed by the Commission not to meet the legal requirement of the CFP regulation. The final approach agreed was a targeted species within a fishery approach (Option 2 in the consultation); the second most preferred approach among the catching sector. As suggested by one respondent, it was all agreed in the NWW group to break down the Western waters into different areas to reflect the different fisheries.

Based on this approach the regional groups have submitted joint recommendations to the European Commission. Copies can be found at [here](#)².

The joint recommendations are to go through a process of review before the Commission releases draft regulations in the autumn. We will inform all interested parties of the release of those regulations.

Q3. Which criteria would you use to determine whether a fishing vessel should be subject to the landing obligation and why? Please provide any supporting scientific, economic or environmental evidence.

It is our responsibility as a Member State to identify the fishing vessels that will be subject to the landing obligation from 1 January 2016 and therefore what rules they will need to comply with.

We consulted on options as to how we may determine when a vessel is active in a fishery and subject to the landing obligation. These options included but were not limited to:

1. Historic catches (value or volume) of demersal quota species made by a vessel;
2. Gear type employed;
3. Geographical location;
4. By trip/haul (defined target species); or,
5. By landings (post trip).

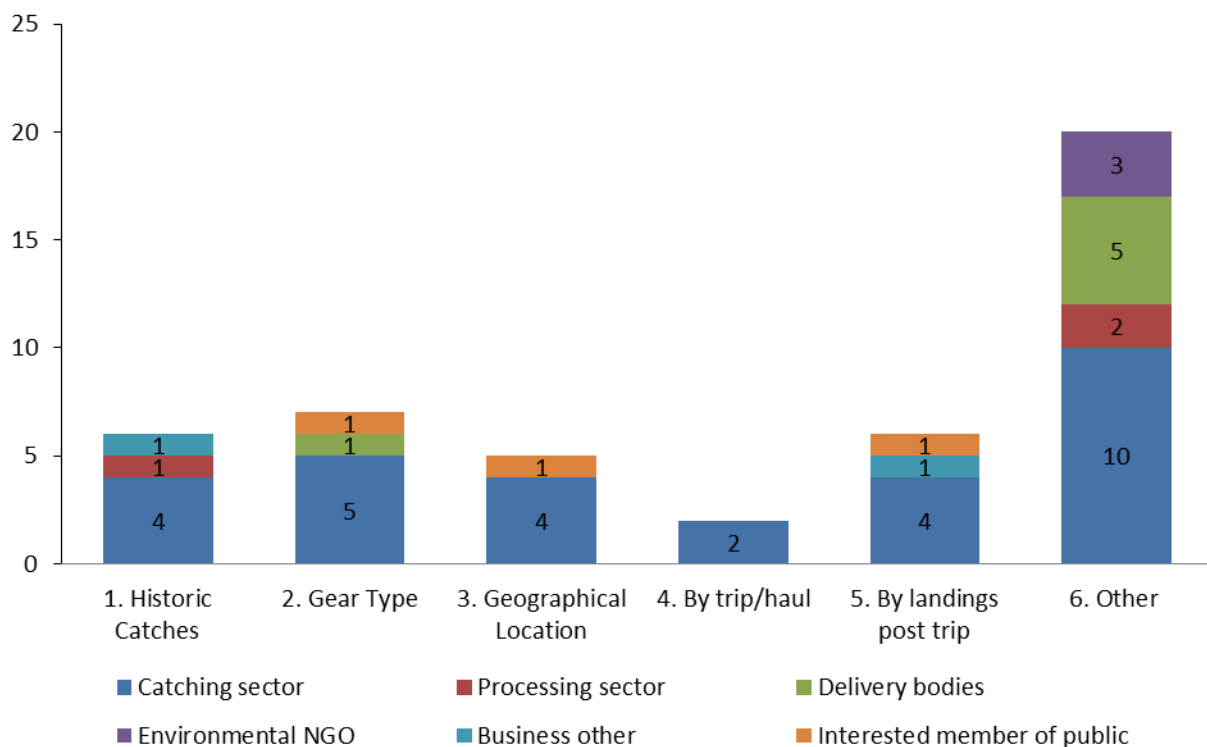
Figure 2 tallied the responses. The most popular option was to define whether a vessel was subject to the demersal landing obligation by the gear type it used, however there were a number of different approaches proposed under the 'Other' category.

² <http://www.seafish.org/responsible-sourcing/conserving-fish-stocks/discards/discards-under-cfp-reform>.

Within the 'Other' category the most popular alternative approach, with three responses, was that of an elective system. This would see the skipper nominate the fishery he is in and therefore the landing obligation rules to which he is subject.

A few responses highlighted the possibility of combining one or more definition criteria to build up a clearer picture of the vessel's target species. One respondent suggested using a species 'trigger point' to indicate the vessel's focus.

Figure 2: Preferred criteria to determine whether a vessel is subject to the demersal landing obligation



One response supported the use of gear type definition noting that gear types tend to reflect target species and it would be easier in the first few years to have a loose gear type definition. Another raised the point that if definition were based on geographical location it is important for it to be applied for the area fished and not the where the catch was landed. Supporters of definition by trip or haul and landings post trip considered that these approaches provided flexibility. Three supporters of the post trip definition stated that it was important for vessels to be able to change their target species during the trip. However one respondent highlighted that under this approach the skipper would not know what he would be permitted to discard whilst at sea.

Six responses felt that all demersal vessels should be subject to the landing obligation in some way in 2016. One of those respondents felt that arbitrary definitions of fisheries will put a greater burden on control agencies and could lead to a disincentive to increase fishing gear selectivity. Others felt that there was no point in an uplift in quota if some vessels continued to discard.

Regional meetings

Meetings in the South West raised particular concerns about the ability to define a fishery in a complex mixed fishery such as those found in that area. Some attendees suggested that catch composition could contribute to the definition criteria.

Under 10m vessel fishermen questioned how they could be considered to be targeting a quota species given their low monthly quota allocations.

Government implementation update

The European Commission ruled against the use of an elective approach as it would be too difficult to enforce. Work within the regional groups has focussed on gear type definition and the use of historic catches, with a species 'trigger point' to help identify those vessels that are truly targeting the species within a defined fishery. Defra has been working closely with Marine Management Organisation (MMO) to understand fleet characteristics and these statistics were further informed by our meetings around the coast.

Once the Commission has agreed the joint recommendations we shall work with the MMO to notify all the vessel owners which, if any, landing obligation they will be subject to in 2016 as soon as possible.

Quota management

Allocation of quota uplift

Q4. Which of these options would you use to allocate any additional quota received as a result of an uplift? Please explain why and provide any supporting scientific, economic or environmental evidence?

To reflect the move from landing limits to catch limits there is the potential that Member States will receive an uplift in quota for stocks subject to the landing obligation. We consulted on how to distribute any additional quota that is allocated to England to support the implementation of the landing obligation.

Any additional quota received will be treated as new quota.

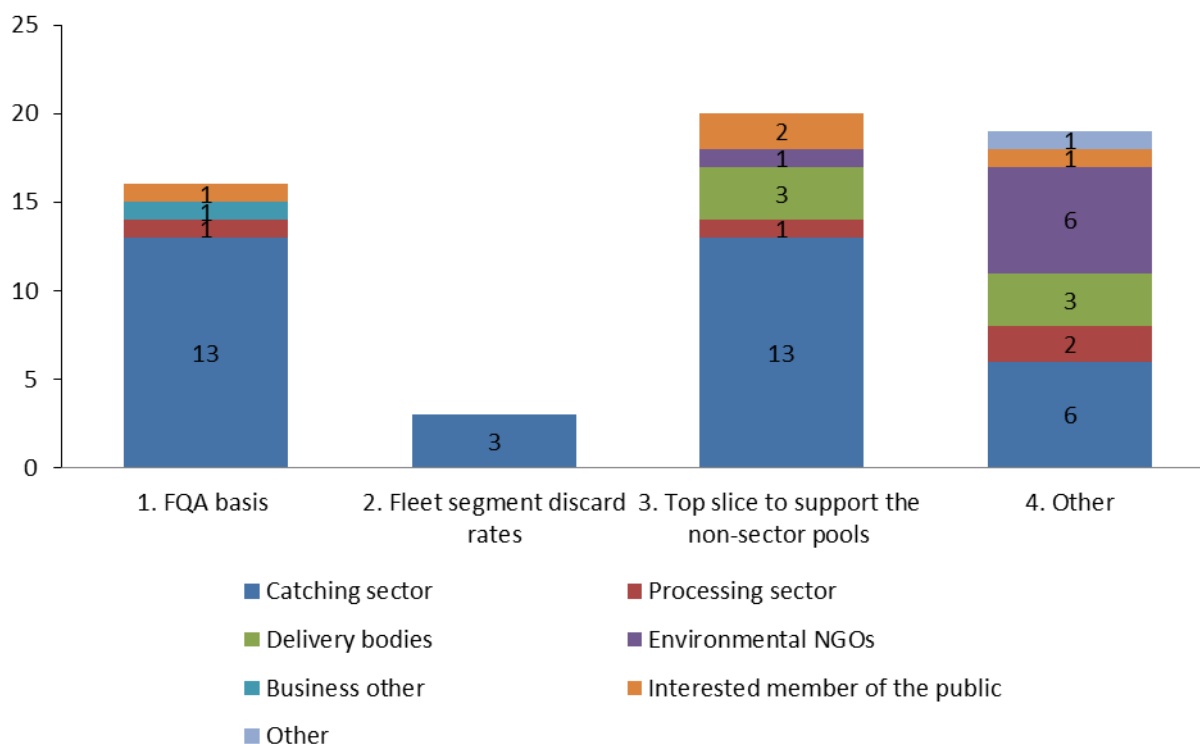
We proposed three potential allocation methods, welcoming any alternative approaches:

1. To allocate any uplift on the basis of Fixed Quota Allocations (FQAs);
2. To allocate any uplift on the basis of current discard rates in individual fleet segments; or,

- To allocate a proportion (e.g. 75%) of the uplift on an FQA basis and use the remainder to add to the non-sector pool(s)³.

We received 58 responses to this question. The most popular option, with 20 responses, was to top slice any quota uplift received to support the non-sector pools. Allocation on an FQA basis was second with 16 responses. However within the catching sector these two options proved equal with 13 apiece (see Figure 3).

Figure 3: Preferred method for allocating any quota uplift received



Figures 4 and 5 highlight the breakdown of views across the catching sector for allocation on an FQA basis or a top slice of quota to support the non-sector pools⁴.

There were 19 responses which did not support any of the three options proposed but provided additional views and comments. Three of these responses stressed the need for accurate discard rates to be used in order to secure a meaningful uplift.

Four comments were received warning against allocation of quota uplift on the basis of FQA units as it may mean that any uplift would go to non-active fishermen who could profit by leasing the quota; the quota would not go to those who needed it.

³ Though the consultation was perhaps unclear on this point, we meant the top slice to be available for both the under 10m pool and the over 10m non-sector pool. We collectively refer to these as the non-sector pools.

⁴ The individual fishermen were those who did not indicate their affiliation with any of the other sub-categories.

Seven responses supported the idea of using the additional uplift quota to incentivise and reward environmentally sensitive or highly selective fishing methods. One suggestion was for handliners to get their own, separate, quota allocation to reward their sustainable approach.

There were two suggestions for the additional quota to be held centrally and allocated on a case by case basis.

Five responses referenced allocating quota uplift on a basis of Article 17. Three environmental NGOs felt that uplift can only be awarded once all catches of a species are subject to the landing obligation.

Figure 4: Catching sector break down supporting FQA allocation

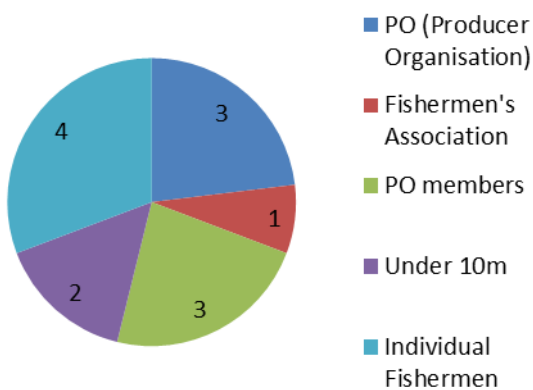
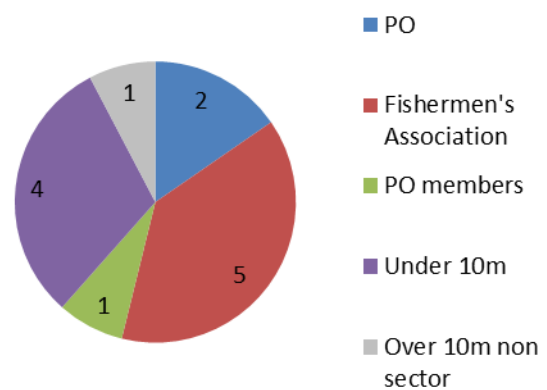


Figure 5: Catching sector break down supporting top slice to non-sector pools



Regional meetings

It was clear at our regional meetings that this was an incredibly contentious issue across the fishing industry.

The opinion of the groups generally reflected the tendency of those operating sector vessels and within POs to favour the allocation of any uplift on the basis of FQAs, and those operating non-sector vessels to favour a top slice of quota to support the non-sector pools.

Attendees were also keen that any additional quota only went to those who are active fishermen.

Management changes for the non-sector pools.

Q5. Do you agree that changes to the quota management rules for under 10m vessels are necessary and why?

Vessels not within a PO fish against a pool of quota managed by the MMO. We consulted on whether these current management arrangements need to be changed.

Table 3: Question 5 breakdown of responses

Consultation response	Number of responses
Yes	38
No	3
Total	41

We received 47 responses to this question; six responses provided additional views rather than submitting a yes or no response. The majority of respondents supported the need for management changes. Eleven responses supported any decisions which would increase the flexibility afforded to the fleet.

Seven responses expressed the difficulty currently faced by the under 10m pool with small monthly catch limits, describing the current system as restrictive and that it prevents them from planning ahead. Two responses proposed the joining up of the two quota pools: under 10m vessels and over 10m non-sector to ease management burden.

Within the consultation we proposed two potential management changes:

1. Longer catch limits

Ten responses supported the move to longer catch limits, however, there was some concern that this could create a race to fish. However one response proposed a solution by suggesting a requirement that a set percentage of the quota is not exceeded by the mid point of the catch limit. Two responses raised concern about the ability to manage this flexibility.

2. Retrospective leasing

Two responses were supportive of retrospective leasing as it afforded the fishermen greater flexibility. However 13 responses were concerned that the retrospective leasing of fish would be unreliable and that it could encourage overfishing or a race to fish. Other concerns included the availability and cost of leasing quota. One response suggested putting a time limit on leases to help improve the management of the flexibility. The respondent suggested only allowing retrospective leasing for nine months of the year in order to prevent an overfish.

Regional meetings

Many attendees raised the problems they encounter as a result of small monthly allocations. The majority of fishermen were in support of longer catch limits, as it afforded them greater flexibility meaning they could take into account external drivers such as weather and market conditions. However some were supportive of these flexibilities in principle but concerned about the ability to manage them within the non-sector pools. Many fishermen stressed the importance of securing a 12 month fishery.

Some fishermen said they would not rely on retrospective leasing as those who have quota to lease would demand high prices.

Q6. Would the introduction of combined quotas be of interest? Please provide any supporting scientific, economic or environmental evidence.

We also consulted on the opportunity to simplify fishing quotas for those vessels managed in the non-sector pools. For example, instead of receiving quotas for each individual species the vessels would receive a single combined quota of whitefish.

Table 4: Question 6 breakdown of responses

Consultation response	Number of responses
Yes	21
No	18
Additional Views	6
Total	45

Five responses welcomed the increased flexibility which a combined quota would allow, highlighting its benefit within a mixed fishery especially. However two responses suggested that this flexibility should be optional for fishermen. There were 14 responses which raised concerns about the ability to constrain total fish mortality under this approach. They felt that within any basket of quotas the most economically valuable species would be targeted more than the others. It would be difficult to enforce and would become very difficult to manage quota uptake accurately.

One of the additional views suggested that there needed to be safeguards in place to ensure no overfishing takes place. Another suggested that further research is needed into this option.

Regional meetings

The meetings reflected the consultation responses we received. They questioned the ability to enforce the combined quota option. They also highlighted the potential for the most valuable species to be targeted more than others.

Q7. Are there any changes that you think should be made to the quota management system to remove incompatibilities with the demersal landing obligation?

Table 5: Question 7 breakdown of responses

Consultation response	Number of responses
Yes	20
No	10
Additional Views	3
Total	33

Four responses supported better communication between quota managers and fishermen accessing the quota pools, in a continued effort to improve management and provide a more regional approach.

Two responses highlighted the need to remove the one net rule and catch composition requirements.

Other responses included: giving under 10m vessels transferable annual quotas, removing under 10m vessels from quota and move to an effort regime, and giving under 10m vessels the ability to give their monthly catch limit back to the pool if they are not going to use it.

Government implementation update

Questions 4 – 7 all refer to English quota management. The consultation responses received will inform policy development and Ministerial decisions. We will continue to work closely with the MMO and devolved administrations on these issues and plan to inform industry of the outcome in autumn.

Quota flexibilities

Q8. Do you agree that the use of borrowing provisions should be allowed? Please explain why and provide any supporting scientific, economic or environmental evidence.

Secured within the CFP reform were additional quota flexibilities for fisheries managers, in order to help industry match catch to quota under the landing obligation. We are proposing to allow management bodies (English POs and the MMO) to use the 10% inter annual banking and borrowing for stocks subject to the landing obligation from 2016 onwards. We consulted on the most effective way to use this flexibility.

We received 40 responses to this question, 34 supported this flexibility.

Table 6: Question 8 breakdown of responses

Consultation response	Number of responses
Yes	34
No	5
Additional Views	1
Total	40

Three responses highlighted the role borrowing could play in helping to negate 'choke' species, one of the responses suggested it could help to secure a 12 month fishery and provide stability.

Along with the general support for the borrowing flexibility, many respondents provided additional thoughts about how it may be best managed. Three responses stressed that borrowing should only be allowed providing its use by one group does not adversely impact on another. Another three responses raised the issue of borrowing against a future year's quota which may experience quota reductions.

One respondent who was not in support of borrowing felt that once your quota is exhausted, that should be it and that you could manage this by using more selective gears. Another response considered that this flexibility will reduce the catch for the following year and that this could not be good thing for the quota system.

Q9. Do you agree with the changes to the banking arrangements in the quota management rules? Please explain why and provide any supporting scientific, economic or environmental evidence.

At present the quota management rules uses an index system to reallocate unused quota. Within the consultation document we proposed two changes:

1. Enable POs to bank up to 10% of their quota and receive back the full amount that they banked in the following year.
2. We will use the national flexibilities to bank any unused fishing opportunities over and above an individual PO's 10% allowance to reallocate them, on a one off basis, in the following year to the non-sector pools. This is not a realignment of FQAs but rather a mechanism to maximise national quota uptake.

Table 7: Question 9 breakdown of responses

Consultation response	Number of responses
Yes	36
No	5
Additional Views	1
Total	42

The majority of people supported these proposed changes. One response stated that the UK's rules regarding banking had become opaque and should be refreshed. Another response said that the current index share method is completely unworkable when planning for the future and needs to be changed before the landing obligation comes into force. Another response agreed that banking 10% and getting 10% back is beneficial. Two reported the increased stability and confidence in banking plans that these changes would provide. Five responses stressed the need for the banking changes to be carried out at a UK level to ensure the English industry is not disadvantaged.

One response suggested that reallocation of the nationally banked quota should be given to the quota pools by fleet segment to promote the use of more selective gears. However another response warned about the potential impact of reallocating nationally banked quota to the non-sector pools. They propose that if the POs know that the pools will be the recipients of any nationally banked quota there will be less PO gifting or leasing quota to the non-sector pools during the year.

Four responses asked how banking and borrowing will work for the under 10m vessels.

Two responses were concerned about the impact that banking could have on achieving Maximum Sustainable Yield (MSY) goals. Two responses proposed that instead of redistributing the banked quota it could be used to help rebuild the stock.

Regional meetings

PO representatives who we met at the regional meetings described the current system as unfair and unreliable. They and other fishermen were in favour of simplifying the rules; banking 10% and getting 10% back. They also stressed that it was imperative that changes to the banking and borrowing rules must be done at the UK level.

Many were supportive of reallocating nationally unused quota. The inshore vessels were wondering how banking and borrowing may work for them and whether it would be available at vessel level or whether the non-sector pool quota managers would be responsible.

Q10. Do you have a preferred approach to applying interspecies flexibility? If so, please provide justification for that approach.

A second flexibility introduced during the reform of the CFP was interspecies flexibility (IF), this is designed to help land bycatches of quota species which a fisherman has no quota for. The non-target species (bycatch) may be deducted from up to 9% of the quota of the target species provided the non-target stock is within safe biological limits.

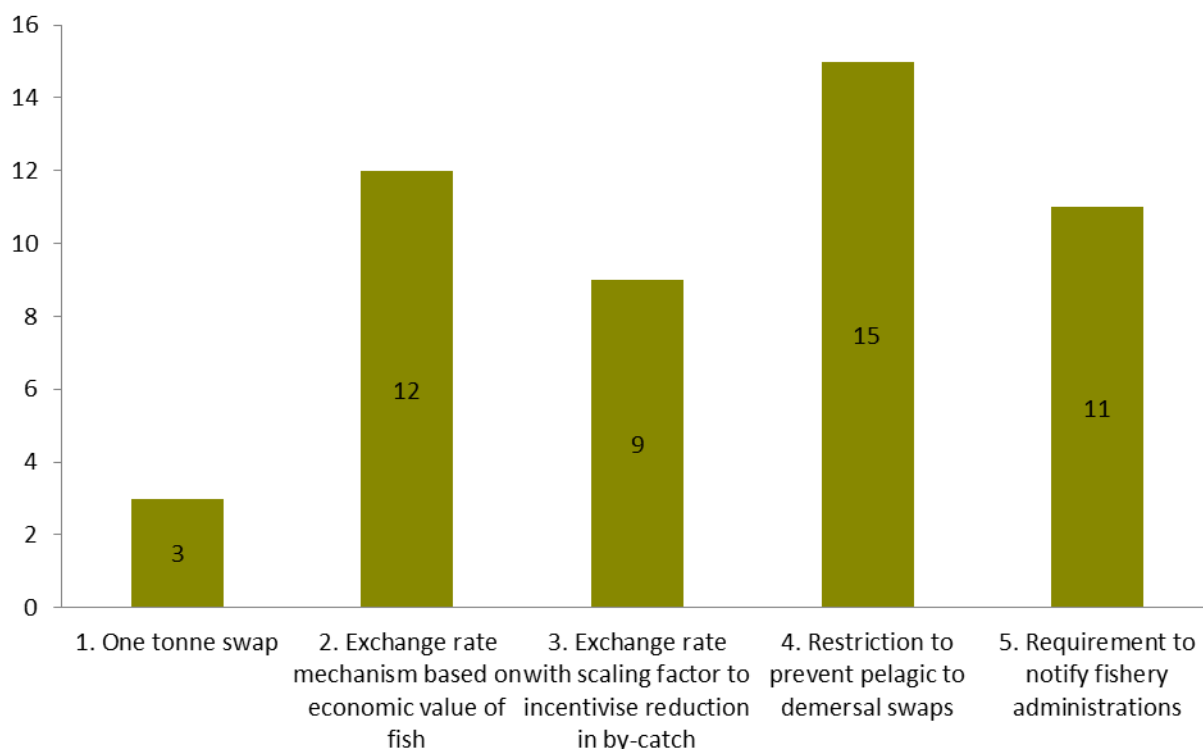
It is the view of Defra that this flexibility should only be applied once the quota for the non-target species has been exhausted and the industry is not able to source additional quota to cover any over fish.

We suggested five methods which could be used to facilitate the use of IF. This was a multiple choice question; the numbers of responses supporting each individual method were tallied (see Figure 6). We received 46 responses to this question.

The restriction to prevent pelagic and demersal swaps was the most popular option. One response highlighted that it could put an at-risk species at even more risk.

Two responses stated that exchange rates are at the heart of IF. The more popular of the two exchange rate based methods was on economic value. Two responses highlighted that this could help to prevent targeting of higher value bycatch species. One response suggested that we should produce an up-to-date cod equivalence index at the start of every year based on the previous year's prices. However one response raised concerns that this method does not prevent the risk of gaming the system, the respondent suggested the leasing price should be considered as well as the market price. Another response suggested that IF could impact the quota leasing market; making traditionally cheaper quota more expensive to lease.

Figure 6: Preferred methodology to facilitate the use of interspecies flexibility



Three respondents agreed that the use of a scaling factor should ensure it rewards sustainable fishing practices and behaviours. However another respondent warned that this method would not represent a fair exchange with the target species and result in lower income for the fisherman.

Supporters of the one tonne swap championed its simplicity.

We received a large number of additional views, highlighting concerns and potential best practice methods. Three responses felt that IF would complicate matters. Three responses supported the need for IF to be used as a last resort, one response wanted it to be made available earlier once the additional quota received as uplift has been used.

Another response highlighted the impact IF may have on fishing mortality and that it could affect our ability to meet MSY. Others stressed the need to monitor this flexibility careful to ensure overall fishing mortality does not increase. Two responses suggested that on-board cameras should be a requirement to use this flexibility.

One respondent suggested a potential safeguard for the use of IF by restricting its use for a period following a species ascension to MSY status. This is to allow for additional stock protection, as presumably the species' quota will already be set at MSY levels so any additional mortality could impact its status. It was also stressed that mortality levels must be attributed to the stock caught, not the stock to which it was converted.

Another response requested that agreement should be reached at the Member State regional group level to ensure that the flexibility is used responsibly.

Some useful questions were raised including: how will fishing administrations know when a PO has exhausted all avenues to secure quota, how will it work within a mixed fishery, where there is no clear target species, and how IF will impact a fisherman’s track record?

Regional meetings

There was general support that a conversion factor would be needed to prevent fishermen from gaming the system. Under 10m vessels considered it would be for non-sector pool quota managers to help them utilise this most effectively.

At one meeting there was concern that reference/conversion prices would become outdated quickly. Prices have large variances; there would need to be at least an annual review of prices. They also raised the potential for IF to close a fishery due to a reporting lag time, it would be imperative that MMO updates its records quickly.

Government implementation update

It is vital we work with other Member States to agree a joined up approach to IF. A level playing field is important to ensure that the flexibility is used responsibly and sustainably. The regional groups have focussed on drawing up the joint recommendations, now that these have been submitted they will turn to agree an approach for applying IF. This work will be informed by the consultation responses.

Q11. Do you think you will need to utilise any of the additional quota flexibilities available under the new CFP basic regulation? If so, please provide details and any supporting evidence.

We received 33 responses to this question, 15 answered with N/A. Four provided additional views which ranged from one response suggesting we leave the EU, two responses saying it was too difficult to know what exemptions they would need to use until the shape of the implementation for the landing obligation is known, and a fourth response that suggested discards should not count against quota.

Table 8: Question 11 breakdown of responses

Consultation response	Number of responses
Yes	12
No	2
Additional Views	4
Total	18

The majority of respondents who answered yes (10) were from the catching sector. Five responses stated that their principle need for utilising the flexibilities was because of the current lack of quota. Three responses also stressed the importance and need for as much flexibility as possible in order to continue to operate under the landing obligation. However one respondent emphasised concern that even with these flexibilities it may not be sufficient to secure a 12 month fishery.

One respondent supported the use of the flexibilities at vessel level in real time, avoiding a long application process through the administrative bodies.

One of the 'No' responses felt that capped licenses should be exempt from the landing obligation and therefore would not need to utilise any flexibilities.

Q12. Do you think that these new quota management flexibilities should be managed at management body (PO and MMO) level? If not, please provide details and any supporting evidence.

We received 36 responses to this question, the majority of which were supportive of our management suggestion.

Table 9: Question 12 breakdown of responses

Consultation response	Number of responses
Yes	32
No	4
Total	36

Nine responses supported the role of POs within the management chain, six of the nine suggested that flexibilities should be managed at PO level in the first instance but that some form of approval or oversight should be maintained by the relevant fisheries administration. One of these responses stressed the need for approval from the fisheries administrations especially for the most extreme flexibilities, such as interspecies flexibility.

Two responses from the non-sector stressed the need to keep the POs out of the management role, one of the responses suggested that the task should be carried out at the regional MMO level. This is similar to another response we received which stated that management should be devolved to managers who are as close to the fishery and its participants as possible.

One response suggested flexibilities should be managed by the MMO in the short term as this should maximise the opportunity to identify and deal with management issues as they arise.

Three responses raised concerns about the ability to manage the use of these flexibilities with the non-sector pools. One respondent who submitted a ‘No’ response suggested that it should be done at a vessel level and recorded on the e-log, this way both the MMO and PO will be made aware.

Q13. Do you think that the proposed changes to the quota management systems will help English fishermen operate under the demersal landing obligation? If not, please provide details or suggest other changes to quota management that would be beneficial.

We received 37 responses to this question.

Table 10: Question 13 breakdown of responses

Consultation response	Number of responses
Yes	21
No	12
Additional Views	4
Total	37

Of the comments we received from those who responded ‘Yes’ to this question, one respondent highlighted the need to enforce the rules, two responses stressed the need for quota uplifts to reflect accurate discard rates, and other responses covered the need for real time reporting; effective communication across the sector; and the need to reform the current quota management system.

Of those who responded ‘No’, a total of five responses raised concerns about how it will work for the non-sector pools. Two of the five said that if survivability and *de minimis* exemptions were not afforded to the inshore fisheries than the fisheries would prematurely close due to ‘choke’ species. Three responses stressed the need for permanent realignment of quota to the non-sector pools and two respondents felt the implementation of the demersal landing obligation was not going to work unless substantial and accurate quota uplifts were secured.

One response listed the concept of relative stability shares as one which will pose challenges for the implementation of the landing obligation saying there will likely be a need for Member States to co-operate to manage larger pools of quota.

Regional meetings

There was support at many of the meetings to continue fostering closer relationships between MMO quota managers and fishermen. Many fishermen felt that there needs to be greater knowledge of seasonality within the management of the non-sector pools. They also suggested that the MMO quota managers should work more closely with POs. Some warned policy decisions should not split the two non-sector quota pools even further by having two different sets of rules. Fishermen were also keen to understand how these flexibilities would work within the non-sector pools.

At some meetings, fishermen thought that these quota flexibilities would not be sufficient to secure a 12 month fishery, especially within a mixed fishery.

Exemptions

Q14. Do you think you will need to utilise a survivability or de minimis exemption? If so, please provide details and any supporting evidence.

Q15. Are there any gaps in our current research programme on survivability and selectivity? Which would you consider to be a priority?

There are two types of exemption to the landing obligation:

- Survivability - species for which scientific evidence demonstrates high survival rates when returned to the sea post capture.
- *De minimis* - where either: i) scientific evidence shows further improvements in selectivity is difficult to achieve or ii) there is disproportionate cost to fishermen in handling unwanted catches.

Any exemption needs to be agreed regionally and be set out within the joint recommendations (discard plans).

When analysing the responses to both questions 14 and 15 it became apparent that the most effective way to review them was to merge the questions together in order to build a complete picture of the fishing industry's needs. We have used the assumption that a statement to utilise a survivability exemption implies a research priority, these have been counted in addition to any research priority explicitly stated within a response.

We received 60 responses to question 14. A total of 44 respondents thought that they would need to utilise an exemption. Eight responses returned N/A and an additional response raised concern about the survival of the fishermen operating under the landing obligation. There were 48 responses to question 15.

Table 11: Question 14 breakdown of responses

Consultation response	Number of responses
Yes	44
No	7
N/A	8
Total	59

Seven of the exemption requests received called for blanket exemptions as a result of fishing method or location see Table 12.

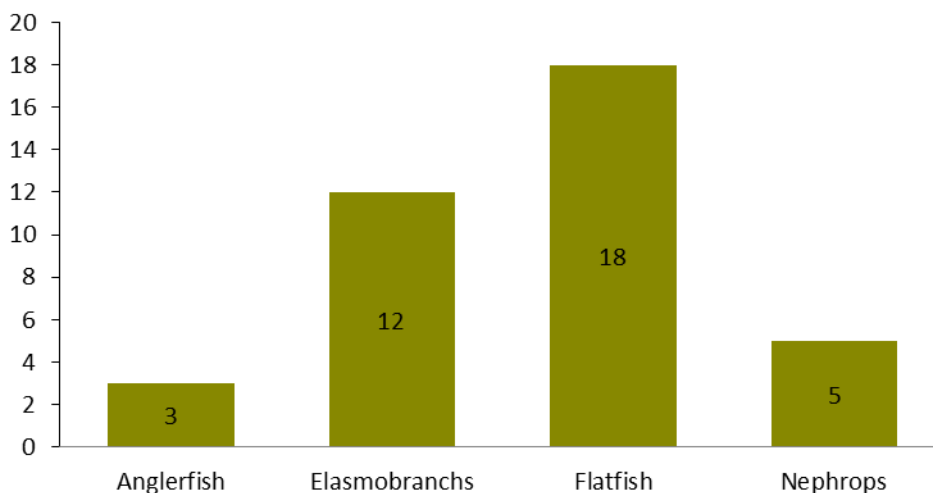
Table 12: List of generic exemption requests

Generic	Type of exemption	Number of requests	Justification
Shallow water/inshore fishing	Survivability	6	Shallow water provides good survival rates and would expect survivability exemptions for most species.
	<i>De minimis</i>	2	A general transitional exemption for inshore fisheries operating outside of the major ports until such time as markets develop
	Unclear	1	The exemption of mono-hulled fishing vessels of less than 18 feet in length.
Passive gears	Survivability	1	When fish caught in passive gears have direct impact on survivability good handling practise allows more than 75% of fish to be returned alive.

Survivability

Figure 7 tallies the survivability requests we received, requests ranged from individual species to species groups.

Figure 7: High survival exemption priorities



Two respondents who called for generic flatfish exemptions listed the species which they think require research. The list covered: brill, dab, flounder, lemon sole, dover sole, plaice, turbot, witch and megrim. Another response stressed the importance of plaice being completely exempt.

Two hand liners identified possible survivability exemptions for: saithe, cod, ling, whiting, haddock and pollack, stating that the fish are more likely to survive due to the shallow water nature of this fishery and good handling practises. This was not included in the graph, but their calls for research into hand line species survivability, has been noted.

Three responses raised concern about the criteria used to define a 'high' survival rate. One stated that it must be possible for exemptions to be based on pragmatic and political criteria, it is their view that an exemption should be granted if there are reasonable indications that including them in the landing obligation will lead to an increase in mortality for the species. Another response suggested the survivability threshold should be set at 25%. The third said that decisions on high survival exemptions will have to be made on the basis of the best available science.

Seven responses supported the importance of ensuring the overall mortality of a species did not increase under the landing obligation. Many responses stated that if a species had a chance of survival it should be allowed to be returned to the sea. One response proposed that fisheries which receive survivability exemptions should be prioritised for additional monitoring.

One response stated that species which are of high research priority are those which are due to come under the landing obligation first. Two responses also stated that there should

be no requirement to record discards as the use of an exemption should not increase the reporting burden on fishermen.

De minimis

There were 13 requests for *de minimis* exemptions.

Of those received one request claimed that it may be appropriate to claim for both types of *de minimis* for elasmobranchs, especially within a mixed fishery. Another request was unclear as to which type of *de minimis* they would utilise. Neither of these have been included in the table below.

Table 13: Breakdown of type of *de minimis* exemption requested

Type of <i>de minimis</i>	Number of requests
Further improvements in selectivity is difficult to achieve	5
Disproportionate cost to fishermen in handling unwanted catches	6
Total	11

Of those requests who claimed disproportionate costs all were concerned about the lack of onshore facilities, including the appetite and viability to install such infrastructure. One of these responses highlighted the issues experienced by shore launched fishermen in particular.

The five responses which were based on the inability to improve selectivity included: hand liners, scallop fisheries, beam trawlers and demersal trawlers.

Two responses raised concern over the impact of the use of *de minimis* over the setting of quotas as it represents a source of mortality. They feared that the use of *de minimis* may prejudice the fishing opportunities of others as a *de minimis* allowance for one vessel could be deducted from the target quota of another.

Two responses stressed the need for improved selectivity to be prioritised over the use of either form of exemption stating that they would like to see support for efforts to reduce unwanted catches which is key to achieving long-term sustainability of the stocks. Another view suggested that exemptions cannot be given except where studies have been done that support its use in that specific fishing area and under realistic fishing conditions.

Regional meetings

The regional meetings reflected the species identified for high survival exemptions within the consultation responses, with the addition of megrim. They also raised the increased

survivability of species which are caught in shallow water. The fishermen were interested in how *de minimis* may work, asking if it could be claimed by a boat or at a national port level.

They stressed the need to keep survivability research going in case species are not accepted as high surviving species straight away. They were concerned that the scientific evidence is not coming through quick enough.

Government implementation update

As suggested by one respondent the regional groups have focussed their efforts on exemptions relevant for the first year of the landing obligation, a number have been included in the joint recommendations which were submitted to the Commission in June. The exemption requests will be reviewed by the Commission's scientific advisory council to confirm they are based on sound scientific evidence.

Once an exemption has been approved and where it is applicable, we are able to apply exemptions submitted by other Member States to the UK fleet. We will issue guidance on the exemptions which have been permitted in the autumn.

Our national research programme has been informed by the responses to this consultation and efforts have/will be focussed on survivability of flatfish species and skates and rays; onshore management requirements (see question 16) and further selectivity where possible. We plan to match future research priorities to the phased introduction of species to the landing obligation, to try and ensure we have the right data at the right time. We also plan to encourage future research to be conducted in a coordinated manner across the Member States to avoid duplication and deliver value for money.

Catch management

Q16. Do you think the taskforce has identified the key challenges for the handling of unwanted catches and quota species below MCRS? If not, please provide details and any supporting evidence.

All catches of fish which fall under the landing obligation will need to be brought ashore and counted against quota. Undersized fish below MCRS (formally MLS) will not be allowed to enter the human food chain⁵. It will have to enter alternative markets such as fishmeal and pot bait.

⁵ This requirement is included in the CFP Basic Regulation and is designed to deter the targeting and creation of markets for juvenile fish.

Defra is facilitating a cross industry taskforce to help find solutions to the key challenges that are likely to be faced in the handling of undersize fish, which was listed within p.37 of the consultation [document](#).

We received 53 responses to this question, 38 respondents felt that there were additional views to be considered by the taskforce, 20 of these contributions were from the catching sector.

Table 14: Question 16 breakdown of responses

Consultation response	Number of responses
Yes	15
Additional Views (No <i>et al.</i>)	38
Total	53

Of the respondents who said yes, one response requested that thought should be given to securing an exemption for the outlying islands of the British Isles due to their remoteness and limited facilities.

Those that provided additional views included four responses stressing the importance of improving selectivity of fishing gears, one stated that this problem is one which should be solved at sea, not on land. One response requested that MCRS be based on scientific evidence that the species would have at least one reproductive season for 50% of females.

Two stated that their ports do not have the infrastructure to handle unwanted catches, another two responses appreciated that there may be grant funding through the European Maritime and Fisheries Fund (EMFF) for installation of shore side infrastructure, but that this does not cover running costs which would need to be recovered during the transitional period before markets emerge.

Six responses were concerned about the logistics of transporting small amounts of fish from remote ports to fishmeal plants, raising questions about who would organise collection and that the low volumes of fish and the long distances to fishmeal factories would make this option economically unviable. Two responses felt that this put an unfair burden on the inshore fisheries, one respondent asked for a general transitional exemption until the potential markets become more developed and easier to access.

One response raised concerns about the impact of unwanted catch entering the bait market. They felt that it could drive down the price for bait and increase fishing effort within the shellfish fishery. However two responses saw the bait market as a good solution to their unwanted catch issues, one stating that it has the best environmental outcome.

Two responses stated that there is little incentive for fish markets to pay for fish under MCRS due to the cost of handling, another stated that current buyers of marketable fish should not be obliged to handle the unwanted catch from whom they habitually buy their entire catch.

Three responses stressed the need to ensure safety was at the heart of the issue of storing unwanted catches on board a vessel.

Regional meetings

Some of the regional meetings were attended by port authorities who were able to provide a further insight into the challenges those involved may face. At one of the meetings there was a suggestion of joining up ports to make any infrastructure installed more viable, creating a port processing hub. The issue about the storage of undersized fish on board was also raised, some were concerned about the lack of boxes to store the fish in, some about the inability of the under 10m vessels to pack their undersized fish with ice; another was concerned about the stability of bulk packing vessels as they are less able to store fish separately. Fishermen wanted to know how authorities will know about the sale of undersize fish for pot bait, and how they will record discards.

Government implementation update

The onshore management of unwanted catch is a challenge that will necessitate different areas of the industry working together, with the Government facilitating discussions and the development of local solutions. A 'one-size-fits-all' approach is impracticable to implement across England as different areas will have different challenges as a result of their specific fisheries, geographical location and the existing local infrastructure available at ports. Defra's view is that the value of all catch, including unwanted catch, should be maximised and that undersize fish is directed to suitable non-human consumption markets. The challenge is to ensure that unwanted catch can be practically and economically directed to these markets.

Due to the phasing of the demersal landing obligation over three years and the application of exemptions we do not expect to see significant quantities of undersize fish being landed in the first year. Vessels are also expected to be highly selective in the catching of their target species which will limit the quantities of undersize fish coming onshore. The exact impact of these two factors on the volumes of unwanted catch is unknown at present – providing another challenge in planning for onshore catch management. We do not want to see excessive investment in infrastructure take place when actual quantities could be minimal.

The cross industry taskforce is continuing to examine the issues around managing unwanted catch onshore – their work to date has uncovered areas that very much echo those highlighted in the responses to this consultation. Potential solutions to the challenges identified are being developed and the taskforce will influence the content of

guidance and best practice for the catching sector and ports to be published by Defra in the autumn.

As stated in the consultation document it is the view of Defra that there is no circumstance where an obligation to comply with a sea-fisheries regulation should compromise the safety of a fishing vessel or its crew. If such a situation arises the master must take whatever action he considers necessary but inform the MMO at the first possible opportunity of what regulation he has not complied with and the relevant circumstances. The MMO will deal with these cases as appropriate.

Monitoring and enforcement

Q17. What form of monitoring and enforcement regime do you think is appropriate for the demersal landing obligation in England? Please provide details and any supporting evidence.

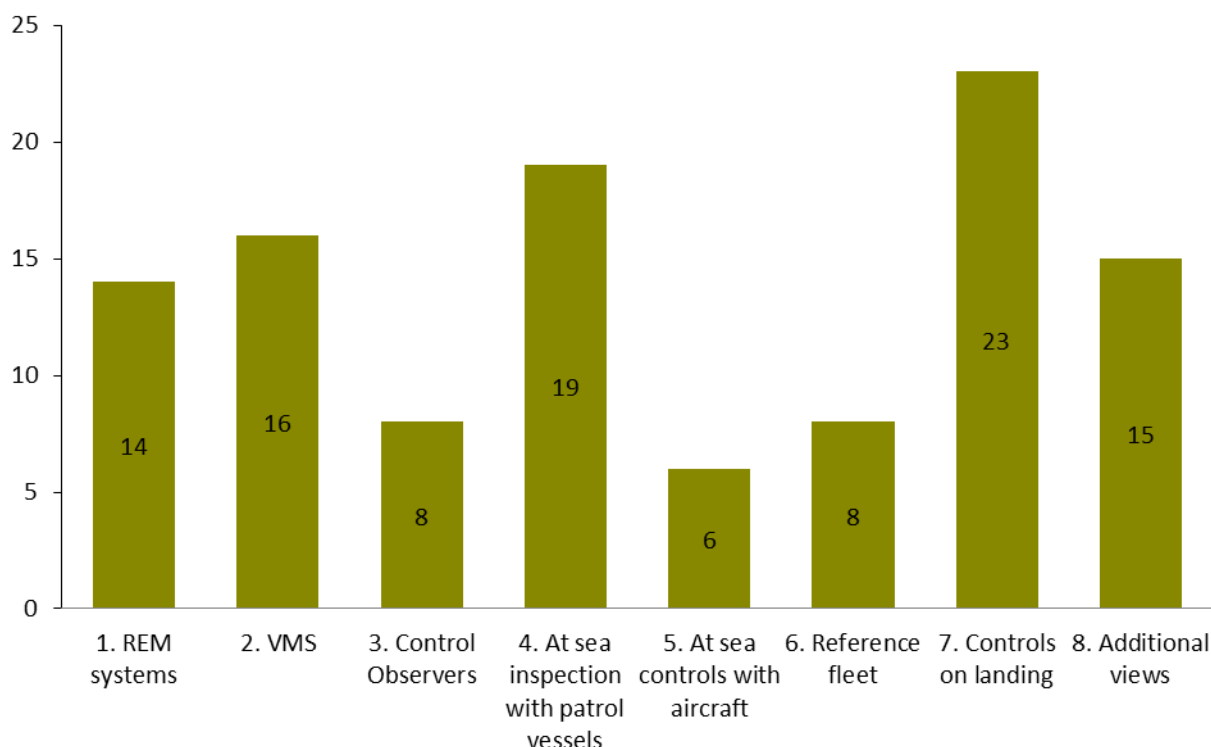
To ensure effective compliance with the demersal landing obligation we anticipate a need to introduce a revised system of monitoring and enforcement. A new system is required because of the increased importance of what happens from the point at which fish are captured at sea to the point of landing. This would be coupled with clear complementary requirements relating to how fishermen document their catches and permitted discards.

The enforcement tools which are being considered by control experts are:

1. Remote Electronic Monitoring (REM) systems (CCTV+ sensors)
2. Vessel monitoring systems (VMS)
3. Control observers
4. At sea inspection with patrol vessels
5. At sea controls with aircraft
6. Catch composition comparison based on a reference fleet
7. Controls at landings

This was a multiple choice question allowing respondents to indicate their preferred enforcement regime. We had 52 responses to this question. The number of responses in favour of each enforcement measure was tallied (Figure 8).

Figure 8: Preferred method for monitoring and enforcing the demersal landing obligation



Some responses provided additional information to explain their preferred approach. Some comments we received included views regarding the use of catch composition reference fleets, with two responses stating that there are too many variables within catches to provide any useful data. The need for controls at landings was emphasised by a respondent so as to ensure that fish below MCRS went into the correct supply chains. Two responses noted that an enhanced reporting regime and full documentation of catches serve as an opportunity to assist and improve our scientific knowledge and research.

For the inshore fleet while one response suggested fitting VMS to all towing vessels over 8m in length and another highlighted how VMS on inshore boats would aid the work of the local Inshore Fisheries and Conservation Authorities (IFCAs), three responses stressed how the under 10m vessels have no space nor the electricity to run equipment on board their vessels. Another respondent suggested that the only method suitable for the under 10m vessels would be at sea inspections with patrol vessels.

Two responses asked for POs to be provided with the appropriate tools to discipline members to stop internal non-compliance in order to prevent it from escalating and impacting the fishery nationally.

Three responses urged the chosen enforcement tools to be proportional and not present an unreasonable burden on the fishing industry. They supported the need for the approach to be risk based, emphasising what might be suitable for one vessel may not be suitable for another. Two responses also stressed the need for monitoring tools to be sufficient in order to secure prosecutions and serve as a deterrent.

Regional meetings

There was strong support for securing a level playing field across Member States on enforcement. Questions were raised about the use of a reference fleet, as it may not be a sufficient deterrent if data captured from it was not able to be used for prosecution. Fishermen felt that there were too many variations across the fleet for this to be a useful tool. Others felt that the focus should be on an incentive to comply, rewarding good fishing practices.

Government implementation update

It is a requirement of the CFP that the enforcement regime of Member States is risk-based and proportionate, focusing enforcement on those sections of the fishing fleet which pose the greatest risk to fishing mortality.

The UK has been involved in meetings with control experts from other Member States in both the NWW and the North Sea regions to examine this issue. Discussion has sought to secure a level playing field on control and enforcement across Member States by identifying where monitoring and surveillance activity should be directed and what are the most appropriate and cost effective enforcement tools to ensure compliance.

The work of the control experts will be further developed now that the Discard Plans have been submitted. We are also in discussion with the MMO and IFCA to ensure a joined up and effective approach. We expect to be able to provide an update in the autumn.

Q18. Would you expect to incur new costs from changes to a new monitoring and enforcement regime? If so, please provide details on expected costs and any supporting evidence.

We received 36 responses to this question. Some responses did not provide any supporting comments and simply stated yes or no.

Table 15: Question 18 breakdown of responses

Consultation response	Number of responses
Yes	13
No	18
Additional Views	5
Total	36

The additional comments we did receive included two respondents' concerns about VMS and e-log books. One flagged up the ongoing maintenance cost of these devices, stating that they would expect REMs to be the same. Another response flagged their concern about the e-log books' ability to cope with the new demands placed on it by the landing

obligation, as they have encountered trouble with it operating under the existing regime. Five responses raised the issue of the increased costs associated with the handling and boxing of the unwanted fish.

Four responses felt that there should be no costs associated with control regime for the landing obligation. Another two responses felt that it is the responsibility of Defra and MMO to meet the costs. Two responses stated that it would be unacceptable for small scale low impact vessels to face additional costs to meet the landing obligation.

Four responses stated that it is hard to provide expected costs when the enforcement approach is unknown.

Regional meeting

Within the regional meetings there was the general expectation that Government would pay for enforcement measures.

Summary of options

Q19. Do you think there are any issues relating to the implementation of the demersal landing obligation in England that we have not identified and should be aware of? If so, please provide detail and any supporting evidence.

We received 36 responses to this question. The responses ranged from saying there is no benefit to UK fishermen via the implementation of the landing obligation to not being sure. The key issues which were identified within the comments we received include:

- The inability of a capped fishing licence to work under a demersal landing obligation;
- The impracticality of small boats recording and weighing catches at sea;
- Further exemptions required for gear types that are highly selective;
- The enforcement requirements to prevent any fish entering the black market;
- The need to work closely with IFCA's to ensure no regional requirements conflict with CFP;
- The impacts of changes to the UK vessel licence categories; and,
- The ease at which EMFF funding is accessed.

Regional meeting

Many of the meetings raised the importance of accessing EMFF funding, one meeting group suggested that MMO should provide fund facilitators who come up with fleet based or port based projects, rather than each individual fisherman applying for it.

Another concern which was raised within the meetings was the impact of vessel licence changes. They noted that changing category B and C licences into category A license could put extra pressure on the quota pools. They also suggested that their fishing practices may change as a result of the removal of some licence restrictions.

Many felt that fishery science lags behind the reality and what fishermen experience at sea. One group said that we need a faster response with another suggesting that there needs to be real time monitoring and real time closures to help fishermen make sensible fishing decisions.

Impact assessment

Q20. Do you have any comments or evidence on the costs and benefits presented in the associated Impact Assessment? This includes, but not limited to, any costs or benefits associated with:

- **Hosting an observer on board;**
- **Familiarisation with any new monitoring and enforcement regime; and**
- **Accessing non-human consumption markets for fish below MCRS.**

If so, please provide details and any supporting evidence.

We received 28 responses to this question. Three responses stated that there would be no benefit to the fishermen with another stating that there would be no benefit to small local fishing boats. One response stressed how difficult it was to cost the unknown.

Three responses said they should not be charged for any costs relating to the enforcement and monitoring regime. Another respondent asked who would pay for the observers.

One response flagged the different issues which an outlying island will face in handling unwanted catches and suggests the associated figures would be much higher. Two responses stressed the need for the impact assessment to consider benefits to the wider marine environment and local communities. Another response challenged the figures used for the cost of REM installation and the cost of observers; they felt that the figure for REM was an over estimate and the cost for observers an under estimate.

One response considered that Defra should support the industry in accessing EMFF and other funding schemes to introduce pilot programmes that will improve the evidence base for sustainable systems of quota allocations.

Regional meetings

The regional meetings raised concerns about the uncontrolled price elevation of quota leasing. Some also flagged the market impacts of landing fish above MCRS but smaller than the usual standards, large quantities of these on the market could impact the wider prices for the species.

Government implementation update

We will issue an updated Impact Assessment informed by the consultation comments in the autumn to accompany the policy announcement and industry guidance.

Way forward

We would like to thank all those who took the time to respond to our consultation and/or attended one of the regional meetings. The responses we received have been most informative and already used in the regional negotiations on phasing and exemptions.

Responses on the other areas of implementation will be used to develop the policy for quota management, onshore management and control and enforcement. We understand and appreciate the implementation of the landing obligation is the biggest change in fisheries management in a generation so plan to give the industry as much time as possible to familiarise and adapt to the new policy. Therefore we are aiming to release the full implementation policy and any accompanying guidance over the next few months.

Annex A: Regional meetings

Region	Port	Date
North East	North Shields	17 February
South West	Brixham	24 February
	Plymouth	25 February
	Newlyn	26 February
East	West Mersea	5 March
	Lowestoft	26 March
South East	Hastings	12 February
	Shoreham	9 March
	Eastbourne	10 March
	Poole	11 March
	Portsmouth	12 March
	Selsey	31 March
	Folkestone	1 April
North East	Grimsby	16 March
North West	Fleetwood	17 March
	Whitehaven	18 March

Annex B: Respondents (organisations)

Amble Seine-Net and Keelboat association

Angling Trust

Brighton & Newhaven Fish Sales

British Sub Aqua Club

Cornish Fish Producer Organisation

Client Earth

Eastern Inshore Fisheries Conservation Authorities (IFCA)

Eastern England Fish Producers' Organisation

Environmental Defence Fund

Folkestone fisherman's association

Food and Drink Federation

Fish Producer Organisation

Gloucestershire County Council

Greenpeace UK

Hastings Fisherman Protection Society

Interfish

Isle of Man Government Department for Environment, Food and Agriculture

Lankford & Sons (Fishing) Ltd.

Lockers Trawlers Ltd.

Manx Fish Producers Organisation

Marine Conservation Society

Mudford and District Fishermen's Association

Natural England

Newhaven Fish & Flake Ice Society Ltd.

National Federation of Fishermen's Organisations (NFFO)

North Devon Fishermen's Association

Northumberland IFCA

New Under Ten Fishermens Association (NUTFA)

PEW

Plymouth Trawler Agents Limited

RSPB

Seafish

Shark Trust
South Coast Fishermen's Council
Southern IFCA
Southwest Handline Fishermen's Association
Sussex IFCA
South Western Fish Producer Organisation
UK Fisheries
W. Stevenson & Sons
West Mersea Fishermen's Association
Whitehaven Fishermen's Cooperative
WWF