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Consultation response to the Fisheries White Paper, *Sustainable Fisheries for Future Generations*

The Government published its Fisheries White Paper on 4th July. The Paper makes clear that it is the Government's intention that "access to UK waters will be on our terms, under our control and for the benefit of UK fishermen" when the UK leaves the EU. We welcome, as part of this, the proposal to seek to move from relative stability to a distribution of fishing opportunities that is fairer to the UK. The White Paper is not specific about what form this distribution might take, except there is the suggestion that zonal attachment could be employed for any additional fishing opportunities gained by the UK.

We were obviously disappointed that the government was unable to deliver earlier exit from the CFP, despite strong indications earlier by Ministers that this would happen. The transition period (assuming that agreement is reached on this) must be used effectively to ensure that the fishing industry is equipped to take full advantage of the opportunities presented and is positioned to mitigate any risks when the UK leaves the EU. We support the Government's stated aim of separating negotiations on access to UK waters from negotiations about access to EU markets, though already there have been signs that the EC negotiating team and other member states are unlikely to concede easily. We recognise that there might be trade-offs if a deal is struck, but would ask that this should not disadvantage the UK's fishing industry. There was a strong sense of betrayal when the UK joined the Common Market; if this were to happen again as we exit the European Union all confidence in the government would be lost. It would be very difficult to re-establish a working relationship between the industry and government ministers and officials. It is a situation that I am sure none of us would want to find ourselves in.

We agree that sustainability should be at the heart of future management arrangements. The White paper states that the government aims to manage UK fisheries – and the wider marine environment – as a shared resource, a public asset held in stewardship for the benefit of all. This is an admirable principle, but we do need to know what it will mean in practice. How it is interpreted and implemented will be critical and will affect the extent to which the local industry here could benefit or lose out.

A difficulty we have with the White Paper is that there are few specifics. Nothing is said about how the proposals will be implemented. There are no timescales given other than the UK's exit from the CFP, nor any indication of relative priorities. It is this detail that matters. Experience has taught us that, with fisheries management, the *how* and the *when* can be more important than high



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level statements of intent or principle. The fishing industry has to operate in a world of business realities and practicalities. It is difficult to do more than signal agreement in principle to proposals or to flag up broad concerns, until we have a much clearer idea about how we might be affected.

We have summarised below some the key issues as far as Plymouth Trawler Agents are concerned:

The government's Fisheries White Paper is noticeably silent on fishing port facilities and services. It also fails to mention interconnecting services such as trading and transport. We believe these to be serious omissions. Fishing ports and markets play a significant role in the fisheries supply chain. They are the hub connecting the catching sector with traders and processors. They also act as a draw and home for associated support services, such as engineering, electrical equipment suppliers, repairs, boat building, etc. In doing so, they can become the basis of highly effective clusters; aligning and reinforcing geographical location, supply, functional linkages, and institutional presence. As such they serve and benefit not just their immediate location but their reach extends regionally. These inter-connecting forces foster innovation and drive, attract talent and strengthen the local and regional economies.

It follows that it is important that the fishing ports should operate efficiently and offer high quality facilities to visiting vessels. The government will need to put in place policies that support and facilitate this. We would like to see this addressed in the next iteration of the development of the government's plans for a sustainable fishing industry.

Fisheries Bill

Fishing remains one of the most dangerous occupations in the UK and the regulatory systems have sometimes exacerbated the problem by adding to the risks. We are pleased that there is the promise to "consider safety throughout the policy development and implementation process for new management systems, practices and technology." This should be embodied in legislation by including provision within the Fisheries Bill.

We comment below on two proposals discussed in this part of the White Paper: cost recovery by the MMO; and a scheme to tender or auction English quota. Both cause us concerns.

Where it is proposed that new powers are taken to regulate fishing activity for the purpose of protecting the marine environment outside marine protected areas we would welcome an assurance that this is comparable to powers to regulate other marine users, otherwise the playing field would be tipped against the fishing industry. On equal access, it will be important that care is taken to



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avoid disadvantaging any particular sector, region or Fisheries Administration. Problems have arisen in the past and lessons should be learned.

Negotiations with the EU and other coastal states

We welcome the government's intention to move away from relative stability, which for many years has seriously disadvantaged the UK. We are realistic about the pace at which this might be achieved, but we do expect early signs of progress once the UK is out of the transition period, with a clear timeline for implementation. When considering the alternatives, presumably based on zonal attachment, consideration will need to be given to not just the UK position overall but also how it will affect the different Fisheries Administrations and the different regions in England.

On access to markets, it is obviously important that access to external markets should be as frictionless as possible. The government, working with other authorities, should be planning for all possible contingencies. We are confident that it will be possible to find new markets in a global economy for high quality fish products. There might be some initial difficulties in the short term with the EU (whatever the outcome of the current negotiations) but over time we are sure that these will be resolvable. Business will find a way, but it will be considerable assisted if Defra plays an active role in supporting our efforts. From our point of view it would be helpful to have greater clarity about likely future requirements in order that we can be properly equipped and prepared.

Territorial issues

We sell fish from vessels arriving from all parts of the UK and further afield. This level of cooperation and working together needs to be mirrored in the future relationships between the four UK Fisheries Administrations. A common UK framework document with a clear set of ground rules would assist considerably. Whilst we can understand the desire to respect the Devolution settlements, as far as possible, industry needs policy consistency and regulatory certainty. It should be possible to achieve sufficient flexibility at the local and territorial level to accommodate regional needs, whilst ensuring that at the UK level there is enough commonality to make sure that a shared resource can be properly managed and the internal and external markets can operate efficiently.

Reforming Fisheries Management

Allocating fishing opportunities

The White Paper draws a line between existing Fixed Quota Allocations (FQAs) and allocating new fishing opportunities. There seems to be the implication that all owners with vessels above 10m in length that hold FQAs are in a comfortable



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position, and are much better placed than the smaller boat owners. In fact, the position is not that simple. Many fishermen, who are entirely or partly reliant on quota, are struggling regardless of the size of their vessel. Even where they hold FQAs, many have to lease additional quota - sometimes at rates that challenge the viability of their businesses. Sometime the quota they require is simply not available. The landing obligation is making a bad situation worse. Among the under 10m sector, there are fishermen facing difficulties because they either cannot access quota species or the under 10m pool does not contain enough of what they need. They too can face major problems because of the landing obligation and because of the impacts of the EU bass control measures.

Therefore, when looking at the proposed distribution of new fishing opportunities Defra should take in to account the needs of all sectors. This market and fishing port relies upon and services a diverse fleet. The vessels that supply PTA vary from large beam trawlers to small day boats. The quantities supplied by the smaller boats produce only a small return for the market, but the quality of the fish can be excellent and contribute to the appeal to buyers. The combination of fish supplies from small, medium and large vessels is part of the market's strength; and characterises a vibrant and diverse industry. We need large vessels as well as small and we would ask that the future allocation of fishing opportunities should reflect this, and recognise the value that the different sectors and subsectors bring to local communities.

The extra quota expected to be gained through 'annual exchanges' and later through moving from relative stability is not quantified in the White Paper, though there is analysis of some individual stocks using various assumptions about zonal attachment. A lot will depend upon relative priorities during the course of forthcoming negotiations. The extent to which quota will be available to meet the several different possible uses proposed in the White Paper is, therefore, not yet clear. Further clarification would be most welcome.

Marine Data and Science

Fish stocks have to be well managed, with sound science to support management decisions. At present, there are numerous data deficient stocks where the scientific data are inadequate or non-existent. Some of these stocks are economically important fisheries in the south west, such as cuttlefish. At present, the European Commission and the ICES determine the priorities for fisheries research and monitoring. UK scientists contribute to this collective endeavour, mostly through ICES. Although there are real benefits from co-operation and co-funding, it can mean that the priorities determined centrally do not always coincide with those of UK fisheries management policy or the interests of the UK industry. There are UK fish stocks where better data would help the industry and help ensure that the stocks are managed sustainably. We



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would like to see the priorities for investment in the research and monitoring reviewed, to ensure that there is a stronger alignment between the needs of industry and the interests of the scientific community. Presently, these sometimes pull in different directions.

The White Paper alludes to raising revenue from the fishing industry to help pay for fisheries science. Among the ideas suggested is tendering or auctioning quota. We could, in principle, support a levy proportionate, for example, to sales, but have serious reservations about quota being auctioned or tendered. The quota would go to those with deepest pockets and if introduced we would see further consolidation within the catching sector, with many operators being driven out of business. If there were a levy of some kind, it would be reasonable for those paying to be given the opportunity to be much more actively involved in determining research priorities, and scientists to be considerably more accountable for their costs and results. We would like to see a more open process for commissioning fisheries research and data gathering; we believe that Plymouth with four marine institutions has a great deal to offer. There is also considerably more scope for engaging fishermen directly in the data gathering, and building partnerships – they have a level of first hand experience and local knowledge that could add considerably to our collective understanding.

Adaptive and responsive management

The sea is a dynamic environment and there remains a great deal of uncertainty about fish movements and what is happening under the surface. It requires an adaptive and responsive management regime, which delivers prompt decision making. The CFP falls down badly on this score. The Fisheries White Paper recognises this and promises timely policy and regulatory decisions once the UK has control of its waters. We would like the industry in the UK to be able to work in partnership with the fisheries administrations in developing the new management system.

The economic link condition

All UK registered vessels that catch and land quota-controlled stock are required under the terms of their licence to meet certain economic conditions. The purpose of these particular conditions is to maintain an economic link that will benefit the UK. They mainly affect UK registered foreign owned vessels, which currently account for a substantial proportion of the fish caught by UK vessels that are landed abroad. The Fisheries White Paper states that the economic link conditions are being reviewed. At present, the conditions are ineffective. There have been longstanding concerns that coastal communities and UK businesses are losing out. We believe that the conditions should be much more robust and



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should be more effectively enforced in order that Plymouth and other fishing ports in the UK should see real benefit.

Under 10 metre' category

We support removal of the under 10m classification of vessels, as it has led to a variety of untoward effects and serves no practical purpose. When seeking to replace it, Defra will want to be careful not to replace one unhelpful classification with another that will distort behaviours and expectations. We suggest that any classification should have an eye to the purpose of placing a vessel in a particular category and how this correspondence with the needs of industry as well as regulators.

Plymouth is notable for the variety of fish species landed and sold. This is the product of highly mixed fisheries and a highly diverse fleet landing to the market. We believe this diversity is vital to the economic viability of the port. Offshore fisheries demand larger vessels, whilst smaller vessels are better suited for working inshore. Engine power will vary, even among inshore vessels. There can be safety reasons for this. In some cases engine power can be related to the impact of the vessel on certain stocks and the marine environment, in other cases it has no bearing or relevance.

The problem with regulatory classifications for administrative purposes is that vessels are built to those rules. It is much better that fishing vessels are designed to meet the needs of a fishery, with safety, efficiency and environmental sustainability firmly in mind.

Recreational angling

We have no objection to integrating recreational angling further into fishery management governance and decisions. We would expect, however, that as a quid pro quo marine anglers should also be subject to effective regulatory controls, and contribute towards the costs of fisheries science if, for example, a levy was introduced on the commercial sector. If the MMO were to introduce cost recovery charges, these should also apply to recreational anglers.

We would have more difficulty if stocks were reserved specifically for the recreational anglers. We presume the White Paper is alluding here to bass. This is an important species for the commercial sector, especially for inshore vessels that have no or limited access to quota species. Preserving bass stocks for anglers would also create major problems with the landing obligation and dealing with 'choke' species.



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MSY, the landing obligation and discards

The landing obligation coupled with the EU's target for implementing MSY has caused major practical difficulties for fishermen. Unfortunately, having championed the policy, Defra has yet to find satisfactory package of solutions. There is acknowledgement in the White Paper that problems do still exist. Urgent action is required. At present the UK seems hamstrung by being within the CFP and having to deal with the intransigence of the European Commission. We hope that Defra Ministers and officials will continue to press for practical measures to be put in place whilst we are still caught by the CFP rules. A number of proposals are outlined in the White Paper for when the UK is free of those rules. Some might help, but we have doubts about the efficacy of charging fishermen the market value of fish landed over quota. It is a theoretical solution that will not translate readily into the real world.

Resourcing the new approach

European Maritime and Fisheries Fund

If the UK is to be in a position to optimize the value from any new fishing opportunities gained and from reforms to the economic link condition, there will need to be investment in the supporting infrastructure. Sutton Harbour fish market and quay are currently operating beyond capacity. The White Paper mentions the employment of modern technology to improve data capture and help better manage our fisheries. Our current structure cannot accommodate much needed technical improvements and updated equipment that is needed now. We are most certainly not in a position to embrace the modern concepts envisaged in the White Paper. We would be keen to adopt them, but additional funding would be needed. This is where a new grant regime to replace EMFF could be of considerable assistance, and could enable Plymouth and other UK ports and harbours to compete with the best.

In replacing EMFF with a homegrown grant regime, there would also be the opportunity to streamline the process for the benefit of both applicants and the MMO.

Introduction by the MMO of cost recovery

There are several propositions in the White Paper to introduce new charges and place new costs on fishermen. There is the proposal that income be raised to contribute towards the cost of fisheries science, there is the idea of auctioning or tendering some quota and there seems to be a move for the MMO to start charging for the management of fisheries. These add up and will hit the bottom line. Cumulatively, they are likely to drive many of the smaller businesses out of the industry, and will work against the government's stated desire to have a



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profitable and diverse industry. The result would probably be further consolidation and quite possibly the end of much of the inshore fleet.

We foresee all sorts of practical difficulties in calculating and attributing, in an equitable fashion, the MMO's fisheries management costs. In evidence to a Parliamentary Select Committee the MMO has previously explained that such cost attribution is difficult, and for this reason it was unable to provide a breakdown. There are considerations such as, how would the costs be divided between different types of vessel? Would foreign vessels be expected to pay? Would the charges be levied on other parts of the supply chain where the MMO has a role?

We also have to bear in mind that the UK catching sector is operating in global market in competition with others in other parts of the world. How would the proposed charges impact on that? Fisheries management cost recovery is very different from the charges that the MMO levies on applicants for marine licences, which are much more self-contained. We suggest that a lot more thought needs to be given to this proposal.