

Section 1 - Setting our course

Q1. Do you agree with the proposed powers in the Fisheries Bill?

We have very strong concerns that the White Paper lacks any real clarity regarding how the distribution of powers between the four Administrations within the UK will function post Brexit. Similar ambiguities in the text of the Concordat have caused endless problems and disadvantaged the English fleet. This error must not be repeated.

Unlike Scotland, (for example), England do not have the luxury of having dedicated Ministerial representation for the industry.

A fair and impartial balance between administrations must be achieved as soon as possible.

Q2. What are your priorities for UK negotiations with the EU on fisheries?

Trade deals with the EU27 and access to UK waters and fishing opportunities must be dealt with as completely separate issues.

As an independent coastal state, the UK should :

Regain substantial quota share that correctly corresponds to all available stocks within UK waters.

Cooperate and manage shared stocks with neighbouring states based on sound science

Ensure trade with the EU remains smooth and tariff free.

Retain a 12mile limit for the benefit of our inshore fleet.

The U.K holds annual bi-lateral negotiations on shared stocks and access to U.K waters. Setting quotas and access should be negotiated with the U.K. best interests.

Q3. What are your priorities for controlling our waters after exit?

To ensure that both UK and permitted non- UK vessels adhere to current UK policy.

Monitoring vessel activities should utilise the best available technology and be compatible with neighbouring countries systems.

To successfully continue sustainable harvesting, any attempt at illegal fishing must be robustly discouraged.

Q4. What are your priorities for the UK's international role in fisheries (beyond the EU)?

To demonstrate that the UK is a world leader in sound management of the seas.

To have representation in all relevant Regional Fisheries Management Organisations .

To responsibly negotiate allocations and policy as an equal with Norway and the EU.

Q5. What are the fisheries policy areas where a legislative or non-legislative common approach (framework) across the UK is necessary?

To maintain equal access to UK waters for all UK vessels. Control and enforcement regulations should be consistent throughout all four F.A.'s to avoid confusion.

UK Minister should retain the ultimate decision-making powers on behalf of all of the UK.

The concordat should either be scrapped or revised. The new version to ensure that there is no discrimination against any particular administration through landing patterns, etc. as is currently the case.

Q6. Do you have any further comments relating to the issues addressed in this section?

Currently the transparency of the FQA Register is being eroded through unnecessary FQA trading moratoriums between F.A.'s.

These barriers should be lifted to allow free and transparent trade within the UK.

Fisheries management should be controlled at a UK level - Devolved powers to be awarded only where prudent and effective to do so.

In addition – the current methodology of top slicing English-only allocations to give to the non-sector under 10 fleet is effectively devaluing English FQA's against the other 3 UK Administrations FQA's. This is particularly unfair in many cases where the stock concerned is not even targeted by the under 10's and remains significantly underutilised.

Q7. Do you agree with the measures proposed to ensure fishing at sustainable levels?

Ensuring that fishing remains at sustainable levels is paramount.

Achieving MSY on all stocks at the same time is not possible however - this requires the application of science-based sensible flexibilities where needed.

The Landing Obligation is another idealistic and impractical method of conservation.

This must be adapted by the UK to simply provide effective incentive for vessels to fish in a responsible manner.

Q8. Do you agree that existing quota should continue to be allocated on an FQA basis?

We strongly agree that existing quota should be allocated on an FQA basis.

Fishing companies and individuals have made substantial investment in FQA's since their introduction, to ensure their vessels fish within quota.

FQA's provide stability for industry.

Holders are more likely to fish responsibly to ensure that their asset does not diminish in value in future years.

Q9. How should any additional quota that we negotiate as an independent coastal state be allocated?

Because quantities of additional quota are presently unknown we advise a cautionary approach initially.

When the tonnages are known then conversations about appropriate distribution can begin.

Additional tonnages should be allocated at UK Administration level on an FQA holding basis.

The devolved Administration can then decide on their own choices of distribution. The methods must not be radically different between F.A.'s however, otherwise it will surely trigger a migration of vessels to register in the most generous Administration.

Q10. Do you agree that Defra should run a targeted scientific trial of an effort system in English inshore waters?

History has shown that effort based systems are not the most productive method of achieving good fisheries management and sustainability .However, it may be beneficial to try this on a very small scale. The participant vessels would need to be under 10 low impact fishers.

Any such trial must not disadvantage the rest of the UK fleet in any way.

Q11. Do you agree with our proposals to explore alternative management systems for certain shellfisheries in England?

Shellfisheries should be managed, based on sound science to ensure responsible harvesting.

This should be a UK wide policy and not solely England.

Management need to be aware of latent capacity.

Q12. Do you agree that there is a case for further integrating recreational angling into fisheries management?

When the UK becomes a Coastal State it is likely (for a while at least) that compliance resources will be already overstretched.

Perhaps considering monitoring/licencing anglers should wait until efficient control and management is in place for commercial vessels?

Q13. Do you agree with the proposed package of measures and initiatives to reduce wasteful discards?

To adopt the Landing Obligation legislation in its current form is folly.

This is an unworkable plan that should be instantly reformed into a practical policy that is a sound basis of conservation management.

In its current form the L.O. will either criminalise many fishermen or bankrupt them.

Q14. Do you agree with the proposed approach to protecting our marine environment in relation to fisheries including the powers proposed in the Fisheries Bill?

Generally agree, but overzealous 'green' ambitions must be considered very carefully before implementation.

All stakeholders must be consulted fully and blanket fishing restrictions not to be introduced merely to score political points.

Q15. What opportunities are there for the sector to become more involved in both the provision and direction of science and evidence development needed for fisheries management?

A collaborative approach between scientists and fishermen is essential.

There are many gaps in the existing science on various stocks that trigger an often unnecessary precautionary approach to TAC's.

The huge resource of data readily available from the UK fleet should be utilised and incorporated into decision making.

Q16. Do you have any further comments relating to the issues addressed in this section?

Mainly due to inaccurate and negative hysterical media coverage regarding fish stocks over the last two decades - there has been a general reluctance for young UK citizens to choose fishing as a career.

Consequently, fisherman from Non-EEA countries such as the Phillipines have become a significantly essential part of UK crews. Current legislation dictates that they are only permitted to be employed on vessels that work outside the 12-mile limit.

This causes severe crewing difficulties for the inshore fleet which needs to be addressed.

Brexit should result in gradual expansion of the UK Industry - as confidence builds then more UK employment will no doubt follow.

In the short and medium terms however, Govt. can assist the industry immensely by simplifying and easing the existing travel, visa and working restrictions for non-EEA crews.

Q17. What would be your priorities for any future funding for the sector or coastal communities?

Safety

Training

Science Projects

Ports and Marketing

Processing

Monitoring cost assistance for vessels.

The new scheme should have a more user-friendly method of application that ensures smoother and faster delivery rather than the cumbersome EMFF system.

Q18. Do you have any further comments relating to the issues addressed in this section?

No

Q19. How far do you agree with our future vision to pursue a partnership approach with industry and others for sustainably managing fisheries?

A partnership approach is definitely the way forward provided that it is indeed a sincere partnership and Industry opinion is correctly respected.

Industry has the most to lose if fisheries management policies are flawed.