

Response ID Redacted: Shetland Fishermen's Association

Submitted to **Sustainable fisheries for future generations**
Submitted on **2018-09-11 09:37:22**

Confidentiality

Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason.:

Your details

1 What is your name? (please leave blank if you would like to remain anonymous)

Name:

Redacted

2 What is your email address?

Email:

Redacted

3 Are you part of an organisation?

Yes

Organisation:

Shetland Fishermen's Association

4 If so, what type of organisation do you work for?

If so, what type of organisation do you work for?:

Other

If you have selected other, please explain:

Trade association

5 If you represent an organisation, what is its name?

Organisation:

Shetland Fishermen's Association

6 What sector of work/interest do you represent?

What sector of work/interest do you represent?:

Catching

7 Which region are you from?

Which region are you from?:

Scotland

8 Do you consider yourself to be based in a coastal area?

Yes

Submitting evidence

Section 1 - Setting our course

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

a) Strongly Agree

Please give reasons for your answer. :

Having laboured for decades with excessively prescriptive EU legislation, the SFA believes that effective management requires a legislative framework that is as concise and straightforward as possible. The Fisheries Bill should be restricted to a set of basic principles concerning business and environmental sustainability, together with what is legally necessary for fisheries managers to react quickly to a dynamic marine environment. We note that of the nine components of the proposed Fisheries Bill listed on pages 16-17, four refer to England alone. The remaining five components – control of access, equal access to UK waters for UK vessels, setting fishing opportunities, sustainability principles and amending retained EU law – would appear to be sufficient.

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

Please give reasons for your answer. :

Moving away from present quota shares based on 'relative stability' to quota shares that are a better reflection of where fish stocks are, known as 'zonal attachment'. While SFA members are prepared to accept a managed adjustment from the current quota shares to zonal attachment shares rather than a 'big bang', they do expect an early and significant improvement in UK shares of key commercial stocks such as herring, mackerel, hake, saithe, cod and whiting. This is partly because existing quota shares for these stocks are distorted particularly badly to the UK's disadvantage, partly because several of them are potential choke species under the present landing obligation and partly because Scotland requires more catching opportunities every year than relative stability shares provide. The pace and degree of adjustment should be a matter of annual negotiation, with the UK unfettered by long-term agreements struck with the EU as part of the Brexit settlement. The UK must not accept any link between access to its waters and access to EU markets; if it did so, its negotiating leverage in annual quota talks would be reduced accordingly.

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

Please give reasons for your answer. :

The SFA believes that control means no guarantee of access to any third party except in the context of Coastal State or bilateral fisheries agreements. This is a perfectly normal position for an independent coastal state to have. Any compromise on this point would reduce or even remove the UK's leverage in negotiating the "fairer allocation of fishing opportunities" pledged by the prime minister. As far as enforcing controls on access to UK waters is concerned, the Joint Maritime Operations Coordination Centre clearly needs resources adequate to its role. Norwegian experience suggests that deterrence through heavy fines and/or impounding vessels could play a significant role in the overall control package.

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

Please give reasons for your answer. :

The SFA supports the government's intention to apply to become an independent member of relevant RFMOs, and notably NEAFC. Indeed, it would make sense for the UK to take its seat as a full contracting party to NEAFC as soon as it leaves the EU on 29 March 2019. The UK should also seek membership of ICAAT. We encourage the UK to play the fullest possible role in policymaking at FAO and other international organisations.

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

Please give reasons for your answer. :

The SFA believes that as a general principle, fisheries management works best when it is devolved as far as reasonably possible. In many areas devolution could usefully be extended from national to regional level, as the success of the Shetland Shellfish Management Organisation amply demonstrates. Without pretending that it has a definitive list of policy areas suitable for a common framework, we suggest the following: economic link conditions on licences, FQA transfers, food standards, technical measures, monitoring and control.

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

Please give reasons for your answer. :

One of the many attractive features of Norwegian fisheries management is the high degree of consensus that appears to have been achieved around what management is for and what public policy purposes it is meant to serve. This has had the effect of taking 'the politics' out of fisheries management and focusing discussions between stakeholders on practicalities. The SFA would therefore welcome efforts by government to establish a consensus around the principles of UK fisheries management (What is it for? What is it trying to achieve? Who should decide how it is done?) that all parties could buy into.

If you wish to upload any evidence to support your responses you can do so using the options below.

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Section 2 – Pursuing sustainable management

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

b) Partially Agree

Please give reasons for your answer:

The SFA fully understands the importance of international commitments regarding MSY, although we would welcome a reversion to the UNCLOS obligation to work towards this target in the place of the scientifically dubious CFP commitment to reach MSY for all stocks by 2020. At the same time, we feel that Brexit offers a possibly worthwhile opportunity to examine and debate other definitions of sustainability, including maximum economic yield (MEY).

The government might usefully consider slightly more sophisticated approaches to sustainability, too, incorporating more explicitly the notions of business sustainability and the sustainability of fisheries-dependent communities. We note with interest that Norway's marine Resources Act refers to the "optimal utilisation of resources, adapted to marine value creation, markets and industries."

Quite rightly, the White Paper mentions the need for "continued and close cooperation with our European partners". From quota talks to long-term management plans, industry participation at the highest level would be beneficial, not just because of its own knowledge and experience but because industry has its own relationships with counterparts in other European countries.

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

a) Strongly Agree

Please give reasons for your answer:

Maintaining business stability and the viability of existing operations is particularly important at this time.

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

Please give reasons for your answer. :

The SFA suggests that there are four potential uses of any additional opportunity that the UK might secure: existing FQA holders, fleet segments catching choke species under the current landing obligation, new entrants, and the under 10-metre fleet. Despite its unique diversity, the SFA's membership sees no reason why all of these claims could not be accommodated post Brexit. But the SFA is wary of governments making allocation decisions top-down. There are marked regional differences even within Scotland in appetite for, and even the usefulness of, additional quota for new entrants and under 10-metre vessels, for example. It may well make sense to give Producer Organisations the task of managing any additional opportunity through 'community quota' schemes or other pooled quota arrangements. In order to take full account of regional differences, objectives could be agreed with government on a case-by-case basis. We suggest early discussions with POs on whether such arrangements and this sort of devolution of responsibility would be advisable and practical.

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

c) Neither agree nor disagree

Please give reasons for your answer:

We would simply make the observation that effort-based systems have not worked well in any large-scale fisheries where they have been tried.

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

c) Neither agree nor disagree

Please give reasons for your answer. Please provide examples, where relevant, of specific approaches that should be prioritised/explored. :

Not an issue for our members.

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

a) Strongly Agree

Please give reasons for your answer. :

The quantity and value of landings by anglers into Shetland ports have reached levels that have significant implications for fisheries management.

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

e) Strongly disagree

Please give reasons for your answer. :

SFA members urge a clean break with CFP logic on discards and have clear ideas on how the issue should be addressed; we append a set of proposals endorsed by the Scottish Fishermen's Federation to this document.

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?

c) Neither agree nor disagree

Please give reasons for your answer. :

We note that the approach proposed in the White Paper applies to England rather than the UK as a whole. As a general observation, the SFA would prefer future discussions around protection of the marine environment to be based on a clearly understood and agreed set of principles described in our answer to Question 6.

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?

Please give reasons for your answer. :

The fishing industry is keen to extend its input into data collection and analysis, especially as it has grave reservations over the quality and quantity of information currently being fed into ICES models. The observer scheme we recommend in connection with discards (see document appended in connection with Question 13) would be part of that effort.

On the output side, the SFA would like to see the government offering industry and other stakeholders an opportunity to review ICES advice before it is considered 'fit for use'. The sector is ill served by the sorts of fluctuations in advice (and therefore quotas) that can emerge from the data gathering and modelling process, and it would make sense for a reality check to be inserted into the advisory process.

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

Please give reasons for your answer. :

No.

If you wish to upload any evidence to support your responses you can do so using the options below.

Please upload your evidence here:

Discards post-Brexit.docx was uploaded

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Section 3 – Resourcing the new approach

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

Please give reasons for your answer. :

Future funding should maximise opportunities for growth in safe working conditions and through the expansion of a skilled workforce. Funding should be directed towards essential onshore infrastructure and ensuring there is an efficient, modern fish processing sector. We would also support associated projects that enable coastal communities to prosper from any future resurgence in inshore, small scale fisheries. Funding to ensure responsible sourcing of product, improved operating practices and environmental credentials would underpin the success of the sector.

Historically the offshore fishing sector has received very little direct funding. EU regulations currently prohibit funding for projects on vessels that are less than five years old. We urge the removal of this restriction for projects related to safety, product quality, crew welfare and fish welfare.

Funding should also support improved collaboration between science and industry. The authorities will need as much expert advice, knowledge, insight and data that it can get if it is to make informed decisions on fisheries policy.

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

Please give reasons for your answer. :

Given our experience of how European fisheries funds such as the FIFG, EFF and EMFF have performed, we would suggest the following operational principles for fisheries-related funding schemes in the UK post-Brexit:

- (i) A shift from a centralised system to regionalised and local delivery. We believe this will be cheaper to administer, relatively light in terms of bureaucracy and more likely to target funds where they are most needed.
- (ii) Localised decision-making for community projects, with larger projects agreed at a regional level. This would increase the chances of successful long-term strategic planning.
- (iii) Recognition that change lies with the local community and depends on the formation of strong and trusting partnerships between residents, local businesses, local service providers, community organisations and the local authority.
- (iv) Funding programmes need to be long-term, i.e. for periods beyond the lifetime of a single parliament. This would help protect them from the political cycle and short-term financial constraints. Political interference has often afflicted past and existing funding programmes.
- (v) A fully-integrated 'one-stop shop' for funding applications rather than the diverse range of funding options that characterise EU schemes.

We urge more detailed thinking around all these points. Thriving fisheries are not merely ends in themselves; they bring benefits beyond the supply chain, creating jobs and prosperity in communities that may not be sustainable otherwise.

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Section 4 – Partnership working

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

Please give reasons for your answer. :

The SFA welcomes government assurances that industry will be embedded in fisheries management and international negotiations. As far as the wider notion of stakeholder groups is concerned, we have often insisted that 'stakeholders' must mean more than 'opinion-holders'. Like other industry organisations, SFA members have often found their practical experience drowned out by small (sometimes very small) groups of individuals who do not live in coastal communities and whose livelihoods do not depend on the state of marine resources.

We suggest that any organisation invited onto a government stakeholder group should have to declare how it is funded and how its internal governance works.

Q20 Do you have any further comments relating to the issues addressed in this section?

Please give reasons for your answer. :

No.

If you wish to upload any evidence to support your responses you can do so using the options below.

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Please upload your evidence here:

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Consultee Feedback on the Online Survey

5 Overall, how satisfied are you with our online consultation tool?

Very satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it: