

## Response ID Redacted: ANONYMOUS 3

Submitted to Sustainable fisheries for future generations

Submitted on 2018-09-12 12:24:11

### 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?

No, I am an individual

Organisation:

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:

Independent fisheries consultant, with background from Redacted

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

Organisation:

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?:

Redacted

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. :

Being an independent coastal state will give the UK a unique opportunity to realign CS allocations with the real-time distribution and abundance of fish stocks within the UK 200/ median line EEZ. This re-alignment of CS allocations should form the basis for a more biological and socio-economically sustainable future for fisheries-dependent coastal communities.

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

Please give reasons for your answer. :

The main focus for the catching sector, irrespective of Brexit, is to identify exclusive UK stocks, and quantify zonal attachment for stocks that are deemed to be shared. Realigning Relative State allocations in relation to ecosystem creep is of utmost importance; as a means of mitigating the possibility for chokes species such as NS 4a hake, and area 7e haddock and 7d cod. This is especially important in respect to the Landings Obligation/Discard Ban, which comes into full force in 2019. The UK government has commissioned work into mapping the extent of zonal attachment for stocks shared with the EU and other parties such as Norway/Faeroe. This is an assignment that the UK should not pursue alone if there is to be any chance of reaching a consensus and ratification by all parts. This work needs to be undertaken as part of a joint EU/UK working group to define criteria for assessing Zonal Attachment (full life-cycle data- spawning, nursery, forage and catch areas etc) and under the scrutiny of an unbiased third party such as ICES, and with observers from countries such as USA and Canada. ICES have informed that they have not received any request from the UK Government to assist in this important and necessary work on defining zonal attachment. Reciprocal, and mutually beneficial access arrangements - arrangements that support optimal bioeconomic exploitation patterns etc. Harmonising technical regulations.

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

Please give reasons for your answer. :

Regulations need to be appropriate, robust, sound science-based, responsive and enforceable. A strengthening of capacity for fisheries protection duties. Establishment of a metier based reference fleet, collecting appropriate fisheries dependent data by way of REM, CCTV, with AI analyses with species recognition, ca. length/weight etc..Harmonised robust technical regulations.

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

Please give reasons for your answer. :

To participate, and be a protagonist for Best Practice Fisheries Management in relevant RFMOs, and strive to further the UK's aspirations of becoming a world leader in BPFM.

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. :

A common framework of biological and socio-economically sustainable objectives, with locally adapted devolved management.

Q6 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:**

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## **Section 2 – Pursuing sustainable management**

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

a) Strongly Agree

**Please give reasons for your answer:**

Yes, I totally agree that the exploitation of marine ecosystems is conducted at sustainable levels. The MSY single stock approach is highly problematic in some fisheries due to stock dynamics within a mixed fishery. A mean fisheries MSY ( a group of main target species) is preferable, and with the caveat of time specific use of upper ranges compatible with HCR.

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

c) Neither agree nor disagree

**Please give reasons for your answer:**

YES and NO: I agree that investments should be protected, but only in so far as the level of investment. The pre Landings Obligation practice of the CFP, was the mandatory discarding of catches in excess of a vessels' quota allocation, has resulted in certain segments of the white fish sector building up large quota holdings of valuable main target species. These are species that will pose the greatest threat as chokes under the LO/discard ban. I advise that the default setting for fishing opportunities is on the basis of "Mixed Species Equivalents" (MSE) relative to a specific fishery; Present FQA holdings can be converted to MSE FQAs by using the present "cod equivalent" value of 1, and the relevant factor assigned to other species. This would give an equal opportunity to participate in a fishery, but only at levels proportionate to previous FQA holdings. The Producer organisations will still have the role of managing the daily uptake and utilisation of quota at species level.

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

**Please give reasons for your answer. :**

The first priority should be to mitigate choke species in both the under and over 10 fleets. The repatriated quota should be allocated on a fishery by fishery basis; with a special focus on the Small-scale inshore fleet - here it would be wise to take consideration to the level of vessel activity, fishing as the main source of income, and ownership of vessel i.e. skipper owner, or owned by others than active fishermen. Quota management responsibilities should lie with the POs. A buffer quota to accommodate unavoidable/incidental catches not covered by vessels own quota allocations or made available from a PO. Over quota catches handled to human consumption standards, and sold on the market. Vessel receives a pre-agreed percentage of achieved market value to cover handling costs (this is set to 20% in Norway) . Some accommodation needs to be made for new entrants.

**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:**

Effort systems such as used in the Faroes and Mediterranean, have resulted in stock depletion, and unsustainable low returns fisheries. If a pilot should be undertaken in the English inshore fleet, then it would need to be apportioned a group quota by species, and equal to a comparable reference fleet allocation, and evaluated over the same period of time ( 1 year, and managed by the Coastal PO or similar) Both fleets would need to consist of a reasonable number of vessels and gear types. All catches must be subject to rigorous catch documentation.

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

Not Answered

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

**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. :**

Absolutely! The effects of recreational fishing are highly controversial, depending on whom one speaks to. Management of recreational fisheries needs to be based on sound science and whether it is ethical to practice catch and release in excess of what one can consume by oneself and family.

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

a) Strongly Agree

**Please give reasons for your answer. :**

Absolutely! The proposed solutions have been available for many years now. Robust, effective gear technical solutions combined with temporal and spatial closures, form the basis for day to day management of fisheries. Nothing wrong with prescriptive management if the medicine works and has negligible side-effects.

**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?**

b) Partially Agree

**Please give reasons for your answer. :**

The UK needs a "doable" holistic and coherent marine environmental policy, based on documentable, and scrutinised evidence. The future of many coastal communities, where fishing is a part of the social fabric is reliant on decisions made on hard facts, and not on ill-informed populist emotions.

**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. :**

There are enormous potential gains to be had by combining the acquired knowledge of the catching sector with the fisheries management and science communities. The concept of using REM in fisheries is something the fishing industry (catching sector,

science, management etc) should seriously consider, as a means to fulfill several functions related to the need for real-time data collection, and a responsive management system. Denmark has been a northern European pioneer in the use of CCTV as a means of documenting that it is possible to reduce discards through the use of gear selection, combined with spatial avoidance measures. The UK has also built up a considerable knowledge base and competency as to the use and benefits of REM, through the UK Catch quota trials program. So what are the potential barriers to a wider uptake of REM? A wider roll-out of REM would involve the participation of the catching sector from day 1, in determining the objectives and scope of its use. The mindset of the fishermen that participated in earlier N sea cod Cqct CCTV trials has changed somewhat from the outset of the trials; what started with scepticism to working in an environment that was constantly under surveillance, an incentive of higher cod quota and penalties for discarding, has given rise to a generation of fishermen that see the potential of REM beyond that of a M&S tool. They see the possibility of RT data collection amongst other things, as a means of bridging the gap between somewhat out of sync TACs, and the availability of fish they're seeing on the fishing grounds. My opinion is that the fishing industry would back the use of REM in the context of a fisheries dependent data collection reference fleet, and rolled out on a proportional representation basis covering the different métiers. Another potential barrier is parts of the scientific community that doubt their ability to process the increased amount of data that could be generated by the fishing fleet. The use of artificial intelligence AI is developing rapidly, with the possibilities for species recognition, size, sex weight etc. It may be a thought to be built this REM project around the need for the wide-based 24/7 FD data collection possibility the fishing fleet is capable of, and willing to supply.

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

**Please give reasons for your answer. :**

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

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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. :**

Funding for fishermen's basic training, with a focus on new entrants. Adequate funding for R & D. Funding for inshore fisheries marketing, catch handling infrastructure.

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

**Please give reasons for your answer. :**

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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. :**

I agree on a partnership of primary stakeholders approach. Going forward it would be imperative to set a new default as to where the fishing industry is in relation to sustainability and fishing practices. Charting a course forward based on real-time relevant facts, and a common understanding of realistic objectives and a navigable/ practicable course to achieve them. A partnership based on having "open ears", and the ability to pose/ understand questions, an open mind, and a good portion of humility.

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

**Please give reasons for your answer. :**

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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:**

It would be helpful with a few keywords from the WP and a reference to the section, along with the question