

# Inshore Fisheries and Conservation Authorities Conduct and Operations Report 2018-2022



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Presented to Parliament pursuant to

Section 183 (1) of the Marine and Coastal Access Act (2009)



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# Summary

This report on the conduct and operation of the Inshore Fisheries and Conservation Authorities (IFCAs) has been laid before Parliament by the Secretary of State for Environment, Food and Rural Affairs (Defra).

It meets the requirements of s.183(1) of Marine and Coastal Access Act 2009 (MaCAA), stating that the Secretary of State must lay before Parliament a report about the conduct and operation of the authorities for any Inshore Fisheries and Conservation districts in existence as soon as is reasonably practicable after the end of every relevant four-year period.

The Inshore Fisheries and Conservation Authorities (IFCAs) are statutory regulators responsible for sustainably managing the exploitation of sea fisheries resources and furthering the conservation objectives of Marine Conservation Zones to six nautical miles from territorial baselines. Further information on the background to the IFCAs is described in Annex A.

Defra legislation (Marine and Coastal Access Act 2009 (MaCAA) set up the IFCAs to deliver IFCA statutory duties and priorities. Accountability and funding arrangements are shared between Defra and the Local Authorities, as well as the governing committees for each IFCA.

This is the third quadrennial report to have been prepared for Parliament and covers the period 2018 to 2022, through which significant events such as Covid-19 and EU Exit took place. The Joint Fisheries Statement, Fisheries and Environment Acts were all introduced through this period. Whilst the consultation was focused on this time period, it is acknowledged that some stakeholders might have included their reflections on their experience of conduct and operations since 2022.

The overall approach to the consultation considered evidence produced by Defra which showed that fishers favour informal conversations over formal consultations. Questions for stakeholders were developed by Defra based on success criteria previously developed and agreed by the IFCA Chief Officers. The following channels used these questions to gather information and evidence which was analysed for this report:

- Questionnaire sent to Chief Officers (August and September 2022)
- In-person engagements as part of quayside conversations (October 2022 to January 2023)
- Citizen Space and Qualtrics online survey platforms which ran for 8 weeks (23 February 2024 to 22 April 2024)
- Data commission and additional information from IFCA Chief Officers (May to July 2024)
- Other relevant information

In total, over 500 responses were received, and the breakdown of respondents is shown in Annex B. As a result, this is the most comprehensive report published by

Defra on the conduct and operations of the IFCAs since they were established under MaCAA.

The report has been constructed around key themes that emerged using the responses to the consultation questionnaires and summaries of conversations. This has allowed for greater flexibility when undertaking the consultation analysis rather than using predefined headings, which may not align with the information gathered through the consultation response. Further detail on the consultation methodology is found in Annex C.

We are very grateful for the time that all stakeholders and Chief Officers have taken to provide constructive input to help us create this report.

The production of this report has aimed to create a concise and cohesive narrative on the conduct and operations of the IFCAs, without losing the detail contained within the consultation response.

# Findings of the report

The report is structured by overarching themes, developed through analysis of the data: Accountability, Governance and Finance; Engaging Stakeholders and Working in Partnership; Evidence and Data; Fisheries Management; and Compliance and Enforcement.

The analysis has led to thirteen government conclusions, which are addressed by the Government Response. The conclusions are as follows:

#### 1. IFCA committee structure and membership

IFCA committee structures are set out in accordance with IFCA Orders and the MMO appoints general members following guidance issued by Defra. Stakeholders report that committee general membership does not adequately reflect fisher representation with respect to knowledge, expertise and input to decision making and that there is an imbalance between fisher and environmental interests.

#### 2. Oversight of IFCA activities

The IFCAs collaborate with other organisations, including the MMO, on various workstreams such as intelligence gathering, enforcement, training, and byelaw development. Stakeholders note duplication particularly between IFCAs and the MMO which may impact on delivery of partnership outcomes, including efficient ways of working.

#### 3. Transparency around decision making

The divergence between the Chief Officers and stakeholder feedback indicates that although the IFCAs may engage with stakeholders to inform decision making and publish decisions, the process between engagement and final decision is not sufficiently transparent for stakeholders.

By not understanding the decision-making process or how the IFCAs have balanced multiple viewpoints, stakeholders (particularly fishers) are not feeling sufficiently engaged and are not able to understand if their inputs have influenced the resultant decision.

#### 4. Funding and accountability

Chief Officers and stakeholders shared concerns with the funding provided to and utilised by IFCAs. Government acknowledges the range of IFCA revenue budgets. It is for IFCA committees to agree work plans that fulfil the IFCAs statutory duties and determine the corresponding level of funding. The current funding model, including accountability arrangements between Defra and Local Authorities, is not transparent and limits the oversight of the effectiveness IFCA management such as day to day running costs associated with the organisations, risks associated with budget management, and delivery of duties.

#### 5. Transparency around consultations

There are a wide variety of engagement methods that the IFCAs use with a significant range of stakeholders, with communication by email and consultations being common

methods. Less common methods included stakeholders accessing authority meeting papers, attending authority meetings, or through social media.

In quayside conversations stakeholders expressed a need and preference for face-toface communication and indicated that online approaches didn't reach some, in particular older members of their community.

Stakeholder perception was mixed around transparency of consultations which led to reduced confidence and trust in IFCA public consultations and how the information is used.

#### 6. Tailoring engagement

Effective stakeholder engagement through the Covid-19 pandemic was challenging.

The large spatial geography of some IFCA districts creates obstacles for effective communication. Stakeholders wished to see engagement that was closer to their home ports and communities. Specific stakeholder groups wish to see engagement and communication channels tailored to the needs of the audience.

#### 7. Promoting partnership working arrangements

IFCAs work closely with other public bodies across several workstreams and through a number of fora. Stakeholders perceive that partnership working is not always communicated sufficiently and appropriately.

#### 8. Stakeholder engagement through data collection

IFCAs gather evidence from a wide variety of stakeholders which enables them to identify and prioritise issues while balancing the needs of local sectors and communities. Fishers perceived that evidence they provided was not always utilised and reflected in reports. Fishers, as an important stakeholder group, wished to see more encouragement of fishers and contractors contributing to data collection and science programmes.

#### 9. Balancing stakeholder views in decision making

IFCA management decisions are shown to be evidence based, using a range of available sources. Some stakeholders, in particular inshore fishers, do not feel that they have sufficient ability to influence management decisions; they reported that their fisheries are not balanced alongside other users of the marine environment, which can impact trust in IFCAs as fishing regulators. IFCA statutory duties as set out in section 153 and 154 of MaCAA state that IFCAs must ensure that the Marine Protected Areas (MPAs) in their district are appropriately protected from damaging fishing activities.

#### 10. Byelaw making process

The process for making and confirming byelaws across the IFCAs, MMO and Defra is complex, and Defra acknowledges the rigour required to implement new legal instruments is extensive.

Efficiencies across partners could be explored to improve stakeholder engagement and the pace at which new measures can be implemented.

#### 11. Building trust

IFCA officers that undertake enforcement are trained in accordance with the requirement of the statutory powers afforded to them through warrants. Stakeholders believe that there is a disproportionate emphasis on enforcement. Some stakeholders report that this may be influenced by the volume of IFCA employees with a police or military background.

#### 12. Knowledge of the fishing industry

IFCA compliance and enforcement strategies are in accordance with Government's Codes of Practice, such as the Regulators Code and Powers of Entry. Officers are highly trained and work in accordance with the codes and associated legislation, as they are legally required to do.

Some fishers would like to see a greater tailoring of approach to include the possibility of face-to-face communication where appropriate, and an increase in enforcement staff who have a background in the fishing industry. Differences are reported between MMO and IFCA enforcement approaches and decisions.

#### 13. Complaints

Efforts are made by IFCAs to conduct activities as a fair and proportionate regulator. Defra recognises that in support of this, there is a need for a consistent and effective complaints process across all IFCAs that is published and easy to navigate.

# Government Response to these findings

We are very grateful for the time that all interested parties have taken to provide constructive input to help us create the IFCA Conduct and Operations Report 2018-2022 ("the report"). The conclusions of the report have guided our approach to developing recommendations to support the improvement of the conduct and operations of the IFCAs. Conclusions have been drawn from the analysis of the evidence arising from the consultation response and supporting data commissions, and recommendations are grouped to address multiple conclusions.

Government will work with interested parties where appropriate, to support the work required to fulfil the implementation of the recommendations. A review of progress will be undertaken by government and reported on in subsequent Conduct and Operations Reports.

Defra will undertake work to further look at the MMO/IFCA interface and regulatory responsibilities. This will include close work with the MMO and IFCAs, and if necessary other marine regulators, to review the roles and responsibilities of MMO and IFCAs as marine regulators, with an eye to improving the regulatory cohesion, simplifying the landscape and developing and agreeing an optimal operational model (Conclusion 2, 7).

This review will look back at the findings of the 2019 IFCA independent evaluation and will consider the themes explored throughout this report, considering, under any future operating model, how to ensure that decision-making and communication thereof is transparent and reflective of key stakeholder interests and sets out best practice where it can be demonstrated (Conclusion 3, 5, 6).

Effective and clear funding and accountability arrangements are critical to the longevity of any organisation. This consultation has highlighted concerns about the complexity of funding arrangements for IFCAs, complicating forward planning and effective delivery. An additional aspect to the review will consider accountability for delivery as well as setting common standards for IFCAs. As part of the wider review on roles and responsibilities mentioned above, Defra will consider funding and accountability arrangements to enable future delivery of statutory duties and government priorities (Conclusion 4).

Given that stakeholder feedback has suggested that committee general membership does not adequately reflect fishers' interests, The review will also seek to strengthen Defra guidance to the MMO with respect to committee general member appointments and will consider ways to increase fisher representation on committees (Conclusion 1). The byelaw making process will be considered including what efficiencies could be made to reduce the time it takes to make and confirm byelaws and communicate those in a timely way to stakeholders (Conclusion 10). It will also consider other guidance that Defra has provided to the IFCAs and any other guidance that may be useful.

# In the immediate term, the Minister encourages IFCAs to implement the following recommendations:

Firstly, to ensure that all stakeholders are given the opportunity to maximise their input into management decisions (Conclusion 9). In parallel, IFCAs should maximise transparency and communication around decision making processes and consultations, ensuring stakeholders can determine how their input is used, and that engagement is tailored to the needs of stakeholder groups (Conclusion 3, 5, 8, 6).

Where IFCAs are compelled to prioritise MPA protection over fisheries management, IFCAs should clearly explain the reasoning for this prioritisation to help build trust and understanding. The IFCAs should aim to be transparent when other constraints impact fisheries management decisions (Conclusion 9).

IFCAs should consider ways to improve collaboration and communication when undertaking regulatory duties to build understanding and trust amongst fishers, such as on the thresholds for issuing advice and guidance and/or taking enforcement action. (Conclusion 11). IFCAs should consider whether closer collaboration with those with a background in the fishing industry can support appropriate enforcement approaches (Conclusion 12). IFCAs should also consider ways to work with local authorities to improve the adequacy of complaints processes and review their effectiveness from a customer-facing perspective (Conclusion 13).

# Consultation Response and Government Conclusions

#### Theme 1: Accountability, Governance, and Finance

Organisational and financial accountability, funding, committee structure, decision making, strategy, planning and reporting are considered. The summary response is below with full detail around sub-themes explored in Annex D.

Chief Officer responses highlighted work undertaken to provide strategic oversight for the authorities, including annual planning and subsequent reporting that informed a broad range of marine and fisheries strategies, statutory duties and government policy. They highlighted a general concern about funding levels, including the uncertainties associated with the reliance on Defra's New Burdens funding, funding security, and the resulting challenge in aligning IFCA duties with emerging opportunities and risks.

Through the Defra Accounting Officer System Statement (AOSS), the IFCAs are listed as a public body for which the Defra Permanent Secretary as Principal Accounting Officer is responsible for the funding Defra provides. The Local Government Act 1999 identifies roles within Local Government that have an accountability role regarding finance and conduct. However, this mix of accountability is complicated and not widely understood.

Constitutions for IFCAs and their delegation of functions also provide an accountability mechanism for which IFCA committees are responsible.

Stakeholder feedback primarily focussed on the structure and functioning of IFCA committees, with concerns ranging across oversight, balance of membership, appointments, impartiality, transparency, experience, knowledge, and decision-making. Concerns were also raised in relation to the efficient use of funding to undertake day-to-day activities, and the sufficiency of funding levels.

Government has highlighted the following key areas from which conclusions are drawn:

# Conclusion 1. IFCA committee structure and membership

Chief Officer responses did not focus on the structure of their committees, in part because this was not explicitly asked, and in part because the Order of each IFCA sets out the proportion of membership which is followed.

The appointment of general members of each IFCA committee is undertaken by the Marine Management Organisation (MMO) and follows guidance issued by Defra to MMO in 2010 in accordance with s.38 MaCAA (<u>ifca appointments guidance.pdf</u> (<u>publishing.service.gov.uk</u>). General members agree to abide by the terms and conditions of their appointment which set out a duty to balance the sustainable management of fisheries with the protection of the marine environment, which includes annual appraisals.

Several stakeholders felt there was an imbalance in committee membership across recreational, commercial, angling, local authority, and conservation members, questioning whether those making decisions were representing their interests or had sufficient experience of their sector.

Many fishers felt that senior IFCA employees had too much indirect influence over decision making when members lacked knowledge on a specific issue. It was stated that knowledge was uneven across committees, with some members holding significant knowledge and others less so.

When excluding the 17 IFCA General Members from the Qualtrics and Citizen Space samples, of the remaining 74 respondents, 21 felt that the IFCA membership was balanced between those who are familiar with the needs and opinions of the fishing community in their district and those who have knowledge or expertise in marine environmental matters, whilst 37 respondents did not feel this was the case.

The Association of Inshore Fisheries and Conservation Authority (AIFCA) provided individual IFCAs with training materials and advice for IFCA members.

#### **Government concludes:**

IFCA committee structures are set out correctly in accordance with IFCA Orders and the MMO appoints general members in accordance with guidance issued by Defra. Stakeholders perceive that committee general membership does not adequately reflect fisher representation with respect to knowledge, expertise and input to decision making.

#### Conclusion 2. Oversight of IFCA activities

IFCA Committees provide oversight for all operational activity. Day to day decision making is supported by working with other IFCAs and organisations. Examples include intelligence sharing, input into national enforcement groups, monthly tasking and coordination group meetings informing work plans, and joint operational activity such as those carried out with the MMO.

The MMO has a responsibility for quality assuring IFCA byelaws as set out in Defra guidance '<u>Defra guidance to IFCAs about making byelaws</u>' to the MMO and IFCAs.

Data that informs workplans is monitored and discussed with other arm's length bodies (ALBs) to assess potential marine protection and fisheries management advice.

Constraints when working with other organisations are acknowledged, such as the consideration by Chief Officers on data sharing agreements, compatible information and other technology systems.

Stakeholder feedback showed they would like to see increased integration of MMO into IFCA activities to provide stronger oversight and to prevent duplication of workstreams. IFCA members from one district suggested that better co-ordination by the AIFCA could prevent duplication across districts. Several fishers from various districts commented that operations took place with insufficient oversight or scrutiny.

#### **Government concludes:**

The IFCAs collaborate with other organisations, including the MMO, on various workstreams such as intelligence gathering, enforcement, training, and byelaw development. Stakeholders perceive that workstreams are duplicated between the MMO and IFCAs which may impact on delivery of partnership outcomes, including efficient ways of working.

The consultation response points to a need for Defra to look at the MMO/IFCA interface (and other marine regulators if necessary) and regulatory roles and responsibilities, as well as improving the regulatory cohesion, simplifying the landscape and developing and agreeing an optimal operational model.

#### Conclusion 3. Transparency around decision making

Chief Officers stated that decisions made by IFCAs are publicly available to increase transparency and accessibility. In addition, early informal engagement with local stakeholders was key in shaping the development of management measures which facilitated formal decision making. Minutes of committee meetings are published on IFCA websites in accordance with the Local Government Act 1972 and the public may attend or put questions to the committee for consideration.

Stakeholder feedback indicated that commercial and recreational fishers did not feel they had significant input into or impact upon decision making. More broadly, several stakeholders indicated that they were not aware of how their IFCA committee operates and were not aware of its structure, with others suggesting their IFCA could better convey decisions where multiple viewpoints had been considered through the decision-making process.

Representatives from conservation organisations suggested that working groups and subcommittees were not as transparent as they could be, indicating that reasons contributing to decision-making were not always clear to the public.

#### **Government concludes:**

The divergence between the Chief Officers and stakeholder feedback indicates that although the IFCAs may engage with stakeholders to inform decision making and the decisions are then published, the process between engagement and final decision is not considered transparent by stakeholders.

By not understanding the decision-making process or how the IFCAs have balanced multiple viewpoints, stakeholders are not feeling sufficiently engaged and are not able to understand if their inputs have influenced the resultant decision.

#### **Conclusion 4. Funding and accountability**

Chief Officers highlighted concerns with funding levels and the uncertainties associated with Defra New Burdens Funding (NBF), resulting in financial challenges with aligning planned IFCA activities with emerging risks and opportunities. One IFCA saw funding uncertainties contribute towards a fifty per cent turnover of staff and struggled to deliver statutory duties of fisheries management in the reporting period. The same IFCA relied on general reserves funding to maintain their ability to meet their statutory duties.

Several fishers felt that their IFCA concentrated their funding on purchasing new assets such as new vehicles, which had left limited resources for day-to-day activities and functioning of their IFCA.

#### **Government concludes:**

Chief Officers and stakeholders shared concerns with the funding provided to and utilised by IFCAs. Government acknowledges the wide range of IFCA revenue budgets. It is for IFCA committees to agree work plans that fulfil the IFCAs statutory duties and determine the corresponding level of funding. The current funding model, including accountability arrangements between Defra and Local Authorities, impacts the effectiveness of IFCA management and the day to day running costs associated with the organisations, including longer term risks associated with budget management and delivery of duties.

#### Theme 2: Engaging Stakeholders and Working in Partnership

Considerations included working with other ALBs, engagement methods with stakeholders, and the impact of restricted engagement through COVID-19.

The responses provided by the IFCA Chief Officers illustrated the breadth of work undertaken to engage a broad range of stakeholders, both formally and informally, throughout bespoke projects and routine activities.

Whilst stakeholder feedback showed that most stakeholders felt they could contact their IFCA when needed, and online engagement had been a valuable development, particularly through the pandemic, there were broader issues highlighted in relation to the transparency of consultations and their outcomes. This included the specific engagement needs of inshore fishers and desire for more convenient face-to-face communication. Whilst approximately a third of respondents had no opinion. As many as 19 of 66 people stated they were dissatisfied with the standards of IFCA communication with some Defra Group ALBs.

A summary of all consultation responses can be found in Annex E. Government has highlighted the following key areas from which conclusions are drawn:

#### **Conclusion 5. Transparency around consultations**

Chief Officers outlined that formal public engagement included calls for evidence and consultation, the results of which were used to refine management proposals over time. Of 79 respondents who indicated how they engaged with their IFCA, the most common method was through email (58 respondents), followed by taking part in consultations (48 respondents).

Despite this, some fishers felt that IFCA consultations were conducted to satisfy convention and regulations rather than to allow for meaningful input into management decisions. Terms such as 'token' were used to describe their experience of consultations.

#### **Government concludes:**

There is a wide variety of engagement methods that the IFCAs use with a significant range of stakeholders, with communication by email and taking part in consultations being common methods. Less common methods included reading authority meeting papers, attending authority meetings, or through social media.

In quayside conversations stakeholders expressed a greater need for face-to-face communication and indicated that online approaches didn't reach some, in particular older members of their community.

Stakeholder perception was mixed around transparency of consultations which led to reduced confidence and trust in their engagement with public consultations.

#### **Conclusion 6. Tailoring engagement**

Chief Officers outlined that methods of engagement were adapted to the needs of the individual stakeholders, with face-to-face communication, letters and phone calls offered alongside a variety of online options such as text, email, and hybrid meetings. This engagement took place through specific stakeholder groups for commercial and recreational fishers, Non-Governmental Organisations (NGOs), and others.

Despite this range of engagement, 9 of 17 inshore fishers felt that fisheries management measures were not explained clearly. This contrasted with the responses of the six anglers surveyed, where none felt that the explanation of management plans was unclear. 32 of all 73 respondents across Citizen Space and Qualtrics felt that clarity of fisheries management measures was poor or very poor.

Several stakeholders reported that communications around specific activities or consultations had been either insufficient or had taken place during busy periods, and respondents reiterated a desire for face-to-face communication, indicating that online approaches did not reach some. Several stakeholders also indicated that meetings were not held close enough to their communities or home ports, affecting their ability to attend in person.

#### **Government concludes:**

Effective stakeholder engagement through the Covid-19 pandemic was challenging.

The large spatial geography of some IFCA districts creates obstacles for effective communication. Stakeholders wished to see engagement that was closer to their home ports and communities. Specific stakeholder groups wish to see engagement and communication channels tailored to the needs of the audience.

#### **Conclusion 7. Promoting partnership working arrangements**

Chief Officers outlined the range of work they do in partnership with Defra Group Arms-Length Bodies (ALBs), including coordinating policy and practice through the National Inshore Marine Enforcement Group, Technical Advisory Group and Chief Officers Group, as well as sitting on various national stakeholder engagement and industry advisory groups. Specific workstreams were also highlighted, such as inputting into the programme of national Marine Protected Area condition monitoring overseen by Natural England.

Despite this, only 18 of 66 of respondents across Citizen Space and Qualtrics were either 'Satisfied' or 'Very Satisfied' with the standard of their IFCAs communication regarding the EA, and this figure was 16 of 66 for MMO. Many of those surveyed indicated they had 'No Opinion', possibility indicating a lack of communication between IFCAs and government

ALBs, and lack of understanding from stakeholders surrounding this ALBs work in partnership to deliver. Other ALBs were not included in these results.

#### **Government concludes:**

IFCAs work closely with other public bodies across several workstreams and through a number of fora. Stakeholder feedback suggests that partnership working is not always communicated sufficiently.

#### Theme 3: Data and Evidence

Chief Officers highlighted their use of annual planning to identify evidence needs, with evidence collected through a range of sources and in collaboration with partner organisations such as MMO and the Centre for Environment, Fisheries and Aquaculture Science (Cefas). Sub-themes from these responses included data sources, data sharing, evaluating interventions, and stakeholder input.

Stakeholder views in relation to data and evidence included omission of experiential knowledge, concern over how data would be used and whether it was being used at all, and a need to encourage engagement of fishers and contractors in science projects and programmes. Whilst more than half of stakeholders surveyed agreed (32 of 51 respondents in Qualtrics) that IFCAs decisions were supported by evidence that was fit for purpose, fewer than half of stakeholders surveyed agreed (39 of 90 respondents across Qualtrics and Citizen Space) that their IFCA responds appropriately when evidence changes, or new evidence emerges.

A summary of stakeholder responses can be found in Annex F, and have led to the following conclusions:

#### Conclusion 8. Stakeholder engagement through data collection

Chief Officers noted in-person and online stakeholder engagement, and citizen science as sources for their evidence collection, with progress in gathering and acting on evidence being included in annual reporting. They also evidenced their engagement with other organisations and stakeholders to identify and prioritise issues while balancing the needs of local sectors and communities. IFCA Research and management groups drew evidence from IFCA staff, the fishing industry, Natural England, citizen science, and the Marine Conservation society.

Despite this, fishers felt that evidence provided to IFCAs was not always passed on to its intended recipients and that this was occasionally reflected in the content of reports and other outputs. A lack of trust also meant that some fishers did not feel comfortable providing their IFCA with information, over concern that it could be used to implement management restrictions that would negatively affect their livelihood.

Fishers in one district stated they would like to see greater encouragement of fishers to engage in data collection for science programmes, as a way of building trust and transparency. A number of fishers suggested that IFCAs should invite contractors or industry to undertake science projects more often.

#### **Government concludes:**

IFCAs gather evidence from a wide variety of stakeholders which enables them to identify and prioritise issues while balancing the needs of local sectors and communities. Fishers perceived that evidence they provided was not always utilised and reflected in reports and wished to see more encouragement of fishers and contractors in data collection and science programmes.

#### **Theme 4: Fisheries Management**

Chief Officers outlined work to underpin and tailor management measures and approaches and contribute towards national priorities, alongside flagging delays caused by interactions within the byelaw making process. They also set out enhanced management for protected areas, the additional evidence collection that is required to do so, and work to mitigate the spatial pressures caused by a combination of protected areas, other marine projects, and other vessels. Sub-themes from these responses were balancing local and national priorities, protected sites and features, and spatial closures and pressures.

Stakeholder feedback highlighted a lack of trust in IFCAs as fisheries regulators amongst specific stakeholder groups, and concerns that management had been ineffective, difficult to understand, and did not strike the correct balance between various considerations. Concerns with spatial boundaries and differing byelaws were also flagged.

A summary of stakeholder responses can be found in Annex G and have led to the following conclusions:

#### Conclusion 9. Balancing stakeholder views in decision-making

Chief Officers noted that data is collected to inform the annual plans and reports that set out their strategic approach to sustainable management, with data collected by environmental and scientific teams through various means such as surveys, Habitat Regulation Assessments and Marine Conservation Zone (MCZ) assessments, and risk registers. Data was also collected through engagement with academia, local industry, and other stakeholders, with the Chief Officers stating that management measures can be adapted in response to the outcomes of this engagement. As stated earlier in this report, engagement with stakeholders is done both formally, through consultations, and informally, throughout bespoke projects and routine activities.

As stated earlier, fishers in multiple districts did not feel there was sufficient impartiality in IFCA Committees when voting on management decisions. A number felt that there was not enough transparency around possible conflicts of interest, and some stated that they felt pressure to agree with management decisions based on personal concerns that their fishery might be threatened if they dissented.

Often fishers stated that they did not feel that they were given equal consideration with other sea users. 30 of all 91 Qualtrics and Citizen Space respondents felt that the IFCAs balanced their responsibilities to contribute to sustainable fisheries and protect the marine environment. When asked through Citizen Space and Qualtrics how well their IFCA had accounted for the local needs of sea fisheries resources within their district, 39 of 91 respondents felt this had been done 'poorly' or 'very poorly', 14 indicated a neutral stance, and 32 felt their IFCA had done 'well' or 'very well'. 6 had no opinion on the matter.

Among different sea users, inshore commercial fishers had a particularly high level of dissatisfaction with their respective IFCAs on this topic: a majority, 10 of 13, indicated that local needs of sea resources had been 'poorly' or 'very poorly' accounted for. One fisher stated that they would like to see a greater focus on 'whole ecosystems functioning' consideration in management and byelaw creation, including social impacts.

#### **Government concludes:**

IFCA management decisions are shown to be evidence based, using a range of available sources. Stakeholders, in particular inshore fishers, do not feel that they have sufficient ability to influence management decisions and consider that their fisheries are not prioritised alongside other users of the marine environment, impacting on trust in IFCAs as regulators. IFCA statutory duties are set out in section 153 and 154 of MaCAA; IFCAs must ensure that the Marine Protected Areas (MPAs) in their district are appropriately protected from damaging fishing activities.

#### Conclusion 10. Byelaw making process

When working with Defra and the MMO to confirm the introduction of new byelaws, a number of issues were highlighted by Chief Officers as impacting on timelines. In one case these issues resulted in several byelaws taking three years between creation and confirmation.

Issues outlined were conflicting legal and policy opinion through MMO and Defra processes, amendments required as a result of the byelaw review process, and an increasing amount of national policy from Government impacting on capacity. This constant change in national fisheries management has also made it difficult to plan beyond a one- or two-year timescale at the local level, although identifying drivers and priority workstreams has mitigated this to some degree.

#### **Government concludes:**

The process for making and confirming byelaws across the IFCAs, MMO and Defra is complex, and Defra acknowledges the rigour required to implement new legal instruments is extensive.

Efficiencies across all partners could be explored to improve the pace at which new measures can be implemented.

#### **Theme 5: Compliance and Enforcement**

All IFCAs have a published Enforcement Strategy which are consistent with other marine and environmental regulators and in accordance with the Regulators Code and the Legislative and Regulatory Reform Act 2006. Regulatory activities should be based on risk, and various compliance and enforcement actions can be applied to those persons suspected of breaking fisheries related law. The risk-based approach and subsequent actions include advisory letters, written warnings, cautions, financial administrative penalties and prosecution.

Inshore Fisheries and Conservation Officers are required to be highly trained, competent and adhere to local and national inspection codes of practice, such as those relating to Powers of Entry when undertaking inspections or investigating offences. In pursuit of well trained and professional staff, one Chief Officer highlighted that staff had undertaken relevant management training through a nationally recognised scheme, with another contributing to the AIFCA National Lead Training Officer (NTLO) programme.

Chief Officer responses illustrated the range of work undertaken in pursuit of fair, effective, and proportionate enforcement. Chief officers highlighted that enforcement activity is governed by strategies, policies, and plans, coordinated through various national and regional fora, and informed by data collection and assessments. Chief Officers also highlighted the range of training undergone by their enforcement officers, bespoke work undertaken to support MMO and EU exit preparations more broadly, and the new and emerging technologies utilised over the reporting period to support compliance and enforcement activities.

Stakeholder feedback highlighted the emphasis placed on enforcement, perception of unfair inspections and ineffective communication, and lack of complaints and arbitration processes. Stakeholders also felt that interactions could seem combative, and there was a desire to see enforcement staff hired who had a background in the fishing industry.

A summary of all responses can be found in Annex 5 and have led to the following conclusions:

#### **Conclusion 11. Building trust**

Trust is an essential element of compliance, with one Chief Officer stating that compliance by consensus is the objective, of which education and advice to stakeholders are key elements. The majority of Chief Officers did not highlight efforts to build trust with stakeholder groups when outlining their enforcement strategies.

Some stakeholders did not feel trusted by their IFCAs and felt there was a disproportionate emphasis on enforcement itself. Some stakeholders felt that the volume of IFCA employees with a police or military background influenced this emphasis on enforcement, with one stating that they felt inspections and interactions with their IFCA had been more combative since officers had received training on interviewing as part of their enforcement duties.

#### **Government concludes:**

IFCA officers that undertake enforcement are trained in accordance with the requirement of the statutory powers afforded to them through warrants. Stakeholders believe that there is a disproportionate emphasis on enforcement, and this may be influenced by the volume of IFCA employees with a police or military background.

#### Conclusion 12. Knowledge of the fishing industry

To ensure that enforcement officers work to clear standards of professionalism and conduct, and are effectively trained, Chief Officers outlined a range of training programmes that were made available for these officers, alongside direct support from senior colleagues. This included a standardised training programme developed in partnership with the MMO which allows officers to demonstrate their professional credentials.

IFCAs also worked closely with each other and the MMO to develop and share best practice for compliance and enforcement. This included building and sharing experience with the other agencies involved with patrols: Police, Local Authorities, Environment Agency, Natural England, Gangmasters and Labour Abuse Authority.

Stakeholders in many districts commented that they had positive relationships with local fishery officers and representatives from IFCAs who come to ports and harbours, who they often viewed as fair and professional. On the contrary, challenging relationships with more senior authority members were mentioned.

Several fishers raised that enforcement and correspondence around regulatory issues were often communicated in writing, as opposed to face-to-face communication. Stakeholders also stated that they would like to see an increase in enforcement staff hired who had a background in the fishing industry.

#### **Government concludes:**

IFCA compliance and enforcement strategies are in accordance with Government's Codes of Practice, such as the Regulators Code and Powers of Entry. Officers are highly trained and work in accordance with the codes and associated legislation, as they are legally required to do.

Some fishers would like to see a greater tailoring of approach to include the possibility of face-to-face communication where appropriate, and an increase in enforcement staff who have a background in the fishing industry.

#### **Conclusion 13. Complaints**

Through alignment with partner agencies and national models of best practice, IFCA decisions to pursue enforcement action is based on a strong evidence base, with one Chief Officer noting that the decision to prosecute is informed by legal advice based on evidential and public interest tests (as laid out in the Code for Crown Prosecutors). Like

other regulatory public bodies, the emerging use of body worn cameras was another example of the objective collection of evidence to inform enforcement activities, as well as protecting the health and safety of staff.

Despite this, only 17 of 62 respondents felt that their IFCA Officers had undertaken inspections fairly, and concerns were raised around ineffective or a lack of complaints processes when fishers experienced issues or had enforcement problems with their IFCA. Stakeholders from several districts suggested that based on difficulties in communicating with their IFCA in the past they would instead choose to contact MMO when encountering an issue.

#### **Government concludes:**

Efforts are made by IFCAs to conduct activities as a fair and proportionate regulator. Defra recognises that in support of this, there should be a consistent and effective complaints process across all IFCAs that is published and easy to navigate.

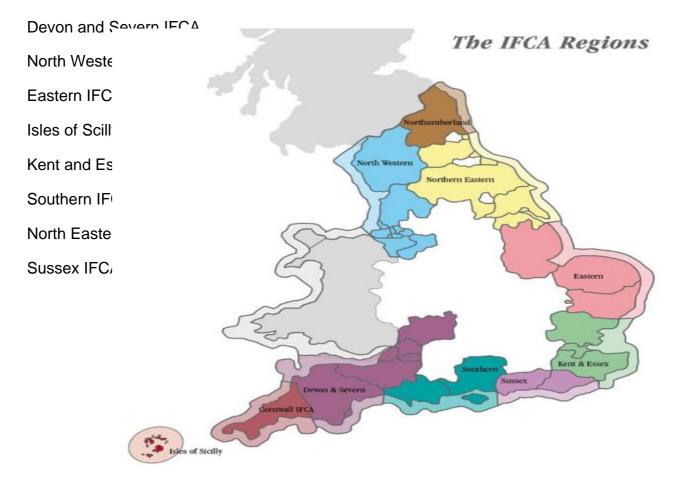
# Annex A: Background of the IFCAs

The overarching duty of the IFCAs is described in s.153 Marine and Coastal Access Act 2009 (MaCAA). They must ensure the exploitation of sea fisheries resources is carried out in a sustainable way, seek to balance the social and economic benefits of exploiting the sea fisheries resources of the district with the need to protect the marine environment from, or promote its recovery from, the effects of such exploitation; take any other steps which in the IFCAs opinion are necessary or expedient for the purpose of making a contribution to the achievement of sustainable development, and seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district. Section 154 of the Marine and Coastal Access Act (2009) states that the conservation objectives of Marine Conservation Zones must also be furthered and must take precedence over any of the duties in section 153.

The ten IFCAs when created in 2009 were successors to Sea Fisheries Committees. They are all in scope for the report and are:

#### Cornwall IFCA

#### Northumberland IFCA



# Annex B: Breakdown of Respondents

- IFCA Chief Officer data submission ten out of ten IFCA Chief Officers responded
- Qualtrics online survey ninety
- Citizen Space thirty-nine (public / other interested parties)
- Quayside conversations seventy-four quayside visits were conducted between October 2022 and January 2023 in each IFCA district, through which 392 people were able to share their views. Respondents to the quayside conversations included skippers, crew, and owners of vessels both over and under 10 metres fishing across a range of gear types and species (e.g., crab, lobster, whelks, bass, cockle, herring, mackerel, scallops, oysters); ex-fishers; boat builders; recreational fishers and charter boat operators; fishmongers; and wider representatives from fishing and aquaculture industry bodies and conservation bodies.

Table 1. Numbers of Qualtrics and Citizen Space Respondents collected during the call for evidence

Respondent type	Qualtrics (n.90)	
Academic Researcher	5	
Arm's Length Body	6	
Employee		
IFCA General Member	20	
Inshore Fisher	27	
Local Government	11	
Councillor		
Recreational Anglers	9	
Other	8	
General Public		23
NGO	4	16

Table 2. List of Meeting Locations for the Quayside Engagements

IFCA District	Port/quay	Number of conversations
Cornwall	Cadgwith	5
Cornwall	Hayle	3
Cornwall	Helford	2
Cornwall	Looe	7
Cornwall	Mevagissey	8
Cornwall	Mousehole	2
Cornwall	Newlyn	7
Cornwall	Newquay	4
Cornwall	Padstow	4
Cornwall	Plymouth	6
Cornwall	River Fal	2
Cornwall	Sennen	3
Cornwall	St Ives	4
Isles of Scilly	St Marys	3

IFCA District	Port/quay	Number of conversations
Devon & Severn	North Coast (Clovelly, Appledore, Ilfracombe, Porlock, Minehead, Watchet, Weston-Super-Mare)	17
Devon & Severn	South Coast (Brixham, Torbay, Dartmouth, Teignmouth, Salcombe)	27
Devon & Severn	Plymouth	12
Eastern	Boston	15
Eastern	Cromer	4
Eastern	Gorleston-on-sea, Great Yarmouth	2
Eastern	King's Lynn	2
Eastern	Lowestoft	1
Eastern	Suffolk	1
Eastern	Wells-next-to-the-sea	2
Kent & Essex	Dungeness	1
Kent & Essex	Essex	1
Kent & Essex	Harwich	1
Kent & Essex	Isle of Sheppey	1
Kent & Essex	Leigh-on-Sea	1
Kent & Essex	Ramsgate	4
Kent & Essex	Southend-on-Sea	1
Kent & Essex	West Mersea	1
Kent & Essex	Whitstable	4
Kent & Essex	Whitstable, Faversham, Queenborough	7
North Eastern	Bridlington	24
North Eastern	Flamborough	1
North Eastern	Hartlepool	6
North Eastern	Hornsea	11
North Eastern	Redcar	2
North Eastern	Scarborough	7
North Eastern	Seaham	3
North Eastern	Staithes	4
North Eastern	Whitby	13
North Eastern	Withernsea	6
North Western	Barrow-in-Furness/Bardsey, Ulverston	3
North Western	Blackpool, Lytham	4
North Western	Bowness-on-Solway	1
North Western	Fleetwood	1
North Western	Flookburgh	6
North Western	Liverpool, New Brighton	5
North Western	Maryport	4
North Western	Morecambe	4
North Western	Silloth	1
North Western	Southport	2
North Western	Whitehaven	3
North Western	Workington	7
Northumberland	Amble	13

IFCA District	Port/quay	Number of conversations
Northumberland	Beadnell	1
Northumberland	Berwick	1
Northumberland	Blyth	15
Northumberland	Craster	1
Northumberland	Eyemouth	11
Northumberland	Holy Island	1
Northumberland	North Shields	1
Northumberland	Seahouses	14
Southern	Lyme Regis to Swanage	15
Southern	Poole to Portsmouth (inc. Isle of Wight)	13
Sussex	Brighton to Rye	14
Sussex	Emsworth to Shoreham	9
Total		392

# Annex C: Methodology

Exact numbers of respondents for Qualtrics and Citizen Space are reported rather than percentages. This is due to respondents being asked different, and individually tailored questions across Citizen Space and Qualtrics, different response rates between stakeholder groups, and respondents being given the ability to skip questions if they did not wish to provide an answer.

For the quayside conversations, Defra provided contractors with a semi-structured guide to engage stakeholders at the quayside, with topic areas focused around the five IFCA success criteria. Due to differences in the ways responses were recorded by contractors for the quayside conversations, and the open-ended nature of the method, analysis of data from quayside engagements focused on providing additional context and detail to the more quantitative Qualtrics and Citizen Space surveys. For brevity, responses provided by IFCA Chief Officers are referred to as responses provided by "IFCAs" when summarised. Stakeholder feedback gathered through in-person engagement have been considered equally alongside all other responses.

# Annex D. Theme 1: Accountability, Governance, and Finance

This theme was informed by a wide range of information considered through all strands of the consultation response. It included data on the operational aspects of the IFCAs such as finance and committee structures.

#### **Accountability**

Section 150 of MaCAA defines each IFCA as a committee or a joint committee of a local council. Their government body classification is described as an 'other' public body or as a Local Government Body (Office for National Statistics for the purpose of producing the national accounts). A public body is a publicly funded organisation funded to deliver a public or government service.

The IFCAs are accountable to Defra for the delivery workstreams as communicated to them by Defra officials to underpin the statutory duties of protecting the marine environment and promoting sustainable fisheries as laid out in MaCAA. Chief Officers are held to account through various forums such as data provision to Defra officials, including reporting, such as through the provision of annual plans and reports.

Defra is not consulted nor has a duty on IFCA budget planning or resource utilisation. That is for the IFCA committees, Local Authority Finance Officers, and IFCA Chief Officers to determine dependent on local needs, workplans, budgets and constraints.

#### Financial accountability

Defra funding is referenced in the Defra Accounting Officer System Statement and is in scope of Treasury requirements around the propriety of the use of Defra funds. IFCAs must publish their annual plan and annual report that sets out the plan of work and how the IFCA has achieved their objectives and budget. These are published on individual IFCA websites.

Accountability with respect to Local Authority funding is governed by two key roles appointed through legislation which have responsibility for governance and financial administration, as described below. The Ministry of Housing, Communities and Local Government (MHCLG) do not have a responsibility for IFCA accountability, other than to set the framework for which Local Authorities operate within:

The s151 Officer (Chief Finance Officer) - Local Government Act 1972. Every local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs.

The Monitor - section 5 of the 1989 Local Government and Housing Act. A Monitoring Officer is the statutory officer responsible for the legal governance of a local authority in much the same way that a section 151 officer is responsible for a council's finances. The IFCAs are specifically mentioned in the 1989 Act, including the role of the Monitor in relation to joint committees and the IFCAs.

Each IFCA Order sets out the local authorities within their membership. Under MaCAA, local authorities have a legal duty to pay the levy (Annex I). Although an IFCA is a levy authority, the elected council members of an IFCA, as the democratically accountable members for local public taxation, have a right of veto over a budget.

#### **Audit and assurance**

The Local Audit and Accountability Act 2014 established new arrangements for the accountability and audit of local public bodies in England. The Act makes specific provisions for local public bodies including smaller authorities such as parish councils, parish meetings and internal drainage boards, IFCAs are not included as relevant bodies as set out in Schedule 2 and Schedule 13(3)(1) to the Act, and accordingly, fall out of the scope of these provisions.

The IFCAs, guided by their Responsible Financial Officer, must still meet their responsibilities as local public bodies. How they do so has been subject to local arrangements.

#### **Committee Structure**

Section 151 of MaCAA and article 5 of each IFCA Order sets out the overall membership of IFCAs as follows:

- Persons who are elected members of a relevant council.
- Persons appointed by the MMO, known as General members or MMO appointees.
   These are persons acquainted with the needs and opinions of the fishing community of the district, and/or persons with knowledge of, or expertise in, marine environmental matters. General members must include at least one employee of the MMO
- Two additional members; one appointed by the Environment Agency and one appointed by Natural England.

As committees of local government, the membership holds the IFCA to account with respect to the delivery of IFCA duties, funding and other governance responsibilities expected of them. The IFCA structure and the balance of membership is set out in each IFCA order and is summarised in Table 3. The maximum number of members in any IFCA is capped at 30 members. Any change to the proportion of membership would require a change to legislation.

Defra issued guidance under section 38 of MaCAA to the MMO on the appointment of General Members who lead on the appointment process. General Members are required to consider all the local fishing and marine conservation interests in the waters of the IFCA district in a balanced way. In practice, all members should take full account of all the economic, social and environmental needs of its district. Whilst representatives of fishing organisations and associations can be appointed, General Members must have regard to the balance of considerations above, rather than a personal or business interest. All General members are required to agree to be bound by the terms and conditions of the appointment, which includes an annual appraisal.

Table 3. IFCA membership committee structure

IFCA	Number of Local Authority Members	Number of Local Authorities	Number of General Members	Number of Defra Group Arm's Length Body nominees	
Cornwall	7	1	11	3	21
Devon and Severn	12	8	15	3	30
Eastern	7	3	11	3	21
Kent and Essex	9	5	9	3	21
North Eastern	13	11	14	3	30
North Western	10	9	17	3	30
Northumberland	7	2	11	3	21
Isles of Scilly	4	1	1	2*	7
Southern	9	6	9	3	21
Sussex	7	3	12	3	21

<sup>\*</sup>denotes Isles of Scilly IFCA does not have a representative from the MMO.

There is an expectation that General Members can serve a maximum of ten years. A pragmatic approach was taken in 2021 as many General Members approached the maximum term, having served on an IFCA since April 2011. This approach was agreed across Defra, MMO and the AIFCA whereby these vacancies were advertised. Any members approaching ten years were eligible to apply and be considered alongside other candidates. Following successful interview, discussion about sector representation in each district and the needs of the Committees enabled IFCAs to make appointments, hold reserve lists and consider succession planning.

The consultation feedback highlighted several areas linked to committee membership as follows:

Fishers raised concerns over the composition of their Authority's Committee, often
reflecting on the balance between recreational, commercial, and angling fishing
sectors and local authority or conservation organisations. A respondent from one
district noted that vetting processes for MMO appointments are national and do not
take account of local issues.

- Fishers also commented on possible imbalances of membership within committees
  concerning vessel size, gear type, and geographical location of home ports.
  Stakeholders in one district commented positively on the increase in positions within
  the IFCA filled by women. Respondents from one district raised concerns that those
  with a fisheries penalty are not permitted to serve on committees.
- In quayside conversations and free-text boxes in Qualtrics and Citizen Space, respondents including anglers, inshore fishers, and NGO representatives frequently indicated that their IFCA had a wide body of legislative, science, and policy knowledge. Whilst some felt that there were no gaps in knowledge for their IFCA, others questioned whether those making decisions were representing their interests or had sufficient experience of their sector, or suggested there was limited expertise to explore social and economic issues affecting fisheries and coastal communities in their district.
- In some instances, it was felt that knowledge was unevenly held across boards, with
  most of the knowledge on certain subjects consolidated in a small number of
  members. Conversations also explored the issue of staff turnover at some IFCAs, its
  implications for institutional knowledge, and how this also affected maintaining and
  building trust with stakeholders.
- Of 91 Qualtrics and Citizen Space responses to a question asking whether IFCA membership was "balanced between those who are familiar with the needs and opinions of the fishing community in their district and also have knowledge or expertise in marine environmental matters", 43 respondents indicated 'No', with 32 stating 'Yes' and 16 answering 'Don't Know/ No Opinion'. When excluding the 17 IFCA General Members from the sample, of the remaining 74 respondents, 21 felt that the IFCA membership was balanced on these issues, whilst 37 did not. 16 answered 'Don't Know/ No Opinion'.
- IFCA General Members were asked the following through the Citizen Space survey: 'Between 2018 – 2022, did you receive adequate training to perform your role?' Of 17 respondents, 8 indicated they felt the training they had received was adequate, 6 indicated that it was not, and 3 stated that they were unsure. General Members were also asked if they received an induction. Of the same 17 respondents, 9 responded 'Yes', 4 'No', and 4 were unsure.

#### **Decision Making**

With stakeholders engaged through Qualtrics and Citizen Space, respondents demonstrated an awareness of what activities IFCAs had undertaken. Of 84 respondents, 72 indicated they were aware that their IFCA had developed byelaws and 74 were aware they had undertaken enforcement activities, 66 stated their IFCA had conducted conservation activities protecting habitats and species, and 48 were aware of the introduction of voluntary local agreements to manage fisheries or protect the marine environment.

Table 4. Number of complaints received by each IFCA over the reference period

IFCA	No of complaints received 18/19	No of complaints received 19/20	No of complaints received 20/21	No of complaints received 21/22
Cornwall	0	0	0	0
Isles of Scilly	0	0	0	0
Devon and Severn	1	6	0	0
Southern	1	1	0	0
Sussex	2	2	0	0
Kent and Essex	1	4	0	0
Eastern	0	0	50	0
North Eastern	5	2	4	5
Northumberland	0	0	0	0
North Western	Data not available			

However, stakeholders from multiple groups across all IFCA districts engaged through quayside conversations indicated that they were not aware of how their IFCA committee operates, or aware of its structure. Fishers stated that communication received from their IFCA could better explain where multiple viewpoints had been considered through the decision-making process.

In quayside conversations, lack of trust in decision-making processes and a perceived lack of transparency among some stakeholders limited their desire to engage with their IFCA. Several also commented that, owing to either previous experience with instances of confrontation or an inability to affect change, they felt meetings were no longer productive and did not regularly attend. The Chief Officers provided information relating to the complaints received over the four-year period (Table 4). This data includes complaints raised with the Chair, those raised about byelaws (outside of the formal process) and raised through the Local Government Ombudsmen.

Some fishers stated that they felt pressure to agree with management decisions based on concern that their fishery might be threatened if they dissented. Fishers in multiple districts raised concern that they did not feel there was sufficient impartiality in Authority Committees when voting on management decisions, and a number felt that there was not enough transparency around possible conflicts of interest.

A number of fishers felt that Chief Officers, Chief Finance Officers and Chairs of IFCAs had too much indirect influence over decision-making, in particular when members lacked knowledge on a particular voting issue. Several fishers expressed concern over the decision-making power of their IFCA more generally.

Sea users, in particular inshore commercial fishers, suggested, in both the quayside conversations and Qualtrics, that increased integration of MMO into IFCA activities could fill knowledge gaps and provide stronger oversight to prevent a perceived duplication of workstreams between IFCAs and the government.

IFCA members from one district suggested that better co-ordination by the AIFCA could prevent duplication across districts. Several fishers from various districts commented that they did not feel there was sufficient transparency around decision-making processes and that operations took place with insufficient oversight or scrutiny.

Representatives from conservation organisations also suggested that working groups and sub-committees weren't as transparent as they could be, meaning that reasoning for decision-making is not always apparent to the general public. Recreational fishers, anglers, and charter boat operators often commented that they had limited contact with their IFCA; both commercial and recreational fishers did not feel they had significant input into or impact upon decision making.

Answers in both Citizen Space and Qualtrics, indicated that opinion on whether IFCAs were knowledgeable on key issue areas affecting marine and fisheries issues was polarised. Across 91 responses to the statement 'Staff in the IFCA(s) were knowledgeable with their approach', 47 either 'Agree[d]' or 'Strongly Agree[d]', 15 indicated a neutral stance, and 24 either 'Disagree[d]' or 'Strongly Disagree[d]. 5 held 'No Opinion'. For specific sea users, 9 of 13 inshore commercial fishers either 'Disagree[d]' or 'Strongly Disagree[d]', with 1 either 'Agree[ing]' or 'Strongly Agree[ing]. 3 of 4 anglers felt that IFCAs were knowledgeable, and none 'Disagree[d]' or Strongly Disagree[d]' with the statement.

## Strategy, Planning, and Reporting

Strategic oversight and general management of IFCA remits are provided by the Chief Officers. At an overarching level, this strategic direction is most commonly done through annual planning and subsequent reporting, but examples given also included five-year planning and legislative forecasts. This allows for longer-term, more cohesive approaches to business planning, with business critical workstreams considered alongside future priorities and opportunities.

IFCAs highlighted annual plans and reports to set out a strategic approach to sustainable, evidence-based fisheries management, which can have their aims and targets amended through regular reviews and in response to changing conditions. Plans are informed by data collection and review and, in one example, work to collate the best available evidence is conducted through environmental and scientific teams and guided by Scientific Advisory Groups. In some responses, sustainability and fisheries management issues are identified and prioritised by scientific officers and included in reports which are then assessed by members.

In some cases, members are consulted on annual plans, which are then submitted to Defra as a requirement under MaCAA. Specific strategies encompass, but are not limited to, research, management, enforcement, and engagement activities. Examples provided included research and monitoring programmes being incorporated into annual and

strategic research plans, byelaw strategies and working groups being used to assist in consolidating byelaws and standardising legislation, and monitoring and control plans being developed for Marine Protected Areas (MPAs), informed by assessments.

## **Funding**

IFCAs are funded by council tax levy charged to the sponsoring local authorities within their membership and Defra New Burdens Funding through s.31 grants to the Local Authorities. This is in the ratio of approximately two thirds Local Authority to one third Defra as shown in Table 5.

Workplans and associated budgets are put forward with the intention for the IFCA to meet its statutory duties. Local Authority Chief Finance Officers will support decision making when balancing overall budgets, whilst also holding responsibility as section 151 officer.

The Chief Officers provided data on funding for the reporting period as shown in table 5 and Annex I. Each year the ten IFCAs raise their levy for their respective revenue budgets to fund the workplans set out in their Annual Plan. Between 2018 and 2022 Table 5 shows the total levy contribution across the 10 IFCAs increased from £9.31 to £9.97 million, an increase of 7.1%. The increase in Local Authority contributions is variable across the 10 IFCAs, ranging between increases of 0.9% in Devon and Severn IFCA and 15.7% in Eastern IFCA with an average increase (across all 10 IFCAs) of a 5.8% increase across the four-year period.

All IFCAs have a reserves fund that provides resilience for unexpected work pressures (Table 6) or emergencies. Most IFCAs have a minimum reserves policy that ensures costs associated with dissolving the organisation are in place. All IFCAs use general reserves interchangeably between years.

Financial information is also published in Annual Reports which are externally published documents on IFCA websites and that are required to be submitted to the Secretary of State for Environment, Food and Rural Affairs.

Table 5. Comparison of revenue budgets raised through levy to local authority and increase over reference period (April 2018 to March 2022)

IFCA	Total Defra annual support grant per IFCA (£)	Total levy from local authorities 18/19 (includes Defra grant) (£'s)	Total levy from local authorities 19/20 (includes Defra grant) (£'s)	Total levy from local authorities 20/21 (includes Defra grant) (£'s)	Total levy from local authorities 21/22 (includes Defra grant) (£'s)	Overall increase in levy contributi on (£)	% incre- ase in LA Levy
Cornwall	324,838	1,129,831	1,153,000	1,202,716	1,226,770	96,939	8.6
Devon and Severn	409,297*	733,601	724,001	740,000	740,000	6,399	0.9
Eastern	394,145	1,411,008	1,561,571	1,606,590	1,632,384	221,376	15.7
Kent and Essex	363,800	889,600	889,600	904,585	904,585	14,985	1.7
Sussex	205,757	963,591	982,862	1,002,600	1,022,700	59,109	6.1
Isles of Scilly	109,723	123,723	126,723	126,723	126,723	3,000	2.4
North Eastern	301,729	1,200,310	1,224,320	1,285,536	1,298,390	98,080	8.2
Northumb erland	154,640	820,616	837,030	857,956	872,021	51,405	6.3
North Western	406,787	1,285,158	1,310,861	1,337,078	1,363,820	78,662	6.1
Southern	329,425	758,755	773,931	789,409	789,409	30,654	4.0
Combined total	2,999,998	9,316,193	9,592,899	9,853,193	9,976,802	660,609	

<sup>\*</sup>Devon and Severn IFCA do not receive all of the New Burdens Funding from Defra

Table 6. Balance of general reserves held by IFCAs (excludes reserves held for Capital or other projects)

IFCA	General reserve balance (£'s)	General reserve balance (£'s)	General reserve balance (£'s)	General reserve balance (£'s)
	18/19	18/19	18/19	18/19
Cornwall	636,505	724,975	686,399	759,504
Isles of Scilly	64,000	44,000	33,267	38,267
Devon and Severn	529,000	532,166	528,812	531,517
Southern	252,114	469,200	527,615	503,995
Sussex	638,985	687,973	819,835	904,890
Kent and Essex	830,100	853,523	853,344	878,576
Eastern	376,974	383,658	383,658	346,555
North Eastern	228,450	258,707	228,450	228,450
Northumberland	128,807	131,313	190,890	175,463
North Western	Data not available			

## Additional revenue income

IFCAs receive additional revenue from a variety of other sources, such as:

Five IFCAs own leases for Several or Regulating (or hybrid) Orders for shellfisheries in their district. These IFCAs generate additional income from leases or rents of these fisheries (Table 7). Some IFCAs needed to issue refunds as a result of the Covid pandemic. Sussex, Isles of Scilly, Northumberland, North Eastern and North Western IFCAs do not have any Several or Regulating Orders in their district.

- All IFCAs run permit schemes and generate income from these permits; some of
  which are aligned with permitting byelaw conditions (Table 8). The cost of permits
  across the IFCAs is highly variable, with many types of permits across a number of
  IFCAs costing the same throughout the reference period. The reasoning from Chief
  Officers is that permits must remain affordable for inshore small-scale fishers and
  those wishing to fish for recreation.
- IFCAs also have scope, where feasible, for commercial revenue generation and research and development work, such as survey work, science projects or data management. Most IFCAs report receiving a number of grants for projects.

IFCAs may be awarded full or partial cost recovery for prosecutions. Fees associated with financial administration penalties (FAPs) are not allowed under Treasury rules to be kept by the IFCAs.

Table 7. Income generated by Several and Regulating Order during the reference period.

IFCA	Underlying legislation	Order type	Income 18/19 (£'s)	Income 19/20 (£'s)	Income 20/21 (£'s)	Income 21/22 (£'s)
Cornwall	The Fal Fishery Order (2016)	Regulating	9,900	8,085	6273*	6448*
Devon and Severn	The Waddeton Fishery Order (2001)	Hybrid	630	630	0	1,020
Southern	The Poole Harbour Fishery Order (2015)	Several	27,794	27,803	29,713	31,800
Kent and Essex	The Thames Estuary Cockle Fishery Order (1994)	Regulating	87,416	87,416	87,416	87,416
Kent and Essex	The River Roach Oyster Fishery Order (2013)	Several	500	500	500	500
Eastern	The Wash Fishery Order (1992)	Hybrid	21,210	31,570	17,160	17,160

<sup>\*</sup> Refunds issued

Table 8. Numbers, types and costs for permits across IFCA districts

IFCA	Permit is a requireme nt of byelaw	Type of permit	No. permits issued 18/19	No. permits issued 18/19	No. permits issued 18/19	No. permits issued 18/19	Annual cost of permit* 18/19 (£'s)	Annual cost of permit* 19/20 (£'s)	Annual cost of permit* 20/21 (£'s)	Annual cost of permit* 21/22 (£'s)
Cornwall		Crustacean shellfish	319	281	302	294	0	0	0	0
		Wrasse	5	5	2	2	135	135	135	135
Isles of Scilly		Recreational	0	0	0	215	3	3	3	3
	yes	Fishing gear permit (byelaw)	0	0	0	0	25	25	25	25
Devon and Severn <sup>1</sup>	yes	Commercial Potting	53	124	74	122	20	20	20	20
	yes	Recreational Potting	148	181	268	276	20	20	20	20
	yes	Commercial Netting	85	66	87	65	20	20	20	20
	yes	Recreational Netting	44	15	44	21	20	20	20	20
	yes	Mobile Fishing at Sea	44	85	49	65	20	20	20	20
	yes	Mobile Fishing in the Estuary	5	6	5	2	20	20	20	20
	yes	Commercial Diving	14	13	8	10	20	20	20	20
	yes	Recreational Diving	78	112	135	173	20	20	20	20
Southern	Yes	Poole Harbour dredge	45	45	45	45	500	600	600	600
		Solent Dredge permit	0	0	0	24	0	0	0	215

<sup>&</sup>lt;sup>1</sup> Devon and Severn permits are valid for up to 2 years. There are more permitted operators in the district than the number of issued permits in any one year

IFCA	Permit is a requireme nt of byelaw	Type of permit	No. permits issued 18/19	No. permits issued 18/19	No. permits issued 18/19	No. permits issued 18/19	Annual cost of permit* 18/19 (£'s)	Annual cost of permit* 19/20 (£'s)	Annual cost of permit* 20/21 (£'s)	Annual cost of permit* 21/22 (£'s)
Sussex		Commercial shellfish	n/a	31	52	25	200 <sup>2</sup>	200	200	200
		Recreational shellfish	n/a	28	39	41	10	10	10	10
Kent and Essex	Yes	Whelk (commercial)	27	29	31	28	100	100	100	100
	yes	Whelk (recreational)	4	6	7	6	30	30	30	30
	yes	Cockle (category 1)	35	0	0	0	836	962	1,106	1,272
	yes	Cockle (category 2)	0	0	0	0	418	481	553	636
Eastern		Wash Fishery Order (1992) - dredge	3	1	0	0	690	342		
		Wash Fishery Order (1992) - handwork	58	48	52	52	330	678	330	330
		Wash Fishery Order (1992) - Wash restricted area	0	18	0	0	0	44	0	0
		Whelk (Commercial) <sup>3</sup>	32	34	29	22	250 max	250 max	250 max	250 max
		Whelk (recreational)4	2	1	0	1	25 max	25 max	25 max	25 max
North Eastern		Scallop dredging	3	3	3	3	500	500	500	500

Commercial shellfish permits in Sussex IFCA are valid for 2 years.
 Cost of commercial permit is 50p/tag with a maximum of 500 tags/permit. Each permit costs a maximum of £250 within each permit limit.
 Cost of recreational permit is £5/tag with a maximum of 5 tags/permit. In 18/19 the permit fee totalled £25 over two permits, in 19/20 it was one permit at £25, and in 21/22 it was one permit for one pot at £5.

IFCA	Permit is a requireme nt of byelaw	Type of permit	No. permits issued 18/19	No. permits issued 18/19	No. permits issued 18/19	No. permits issued 18/19	Annual cost of permit* 18/19 (£'s)	Annual cost of permit* 19/20 (£'s)	Annual cost of permit* 20/21 (£'s)	Annual cost of permit* 21/22 (£'s)
North Eastern (cont.)	Yes	Humber Estuary Trawl Permits	0	0	3	2			500	500
	Yes	Intertidal Fixed netting	0	0	0	5	0	0	0	500
	Yes	Subtidal Fixed Netting	0	0	0	3	0	0	0	500
	Yes	Shellfish commercial	350	350	350	350	0	0	0	0
	Yes	Shellfish leisure	2,462	2,417	1,407	3,061	0	0	0	0
	Yes	Trawl	150	150	150	150	0	0	0	0
Northumber- land		Shellfish	91	99	109	107	180	180	180	180
		Trawling	26	33	38	43	50	50	50	50
		Dredging	5	8	4	2	150	150	150	150
		Shellfish Recreational	181	202	210	240	10	10	10	10
North Western	Yes	Cockle and Mussel Hand- Gathering	130	130	130	130	500	500	500	500

## **Outgoings**

Generally, IFCAs require specific arrangements for premises to effectively operate. As independent regulators these are organised autonomously tailored to their operational needs. Most IFCAs lease their premises which allows flexibility in terms of location and financial commitment. All the IFCAs with leases experienced increasing costs (Table 9), though some savings were made during the Covid Pandemic.

Table 9. Costs associated with office leases for IFCAs

IFCA	Cost of leased premises 18/19 (£'s)	Cost of leased premises 19/20 (£'s)	Cost of leased premises 20/21 (£'s)	Cost of leased premises 21/22 (£'s)
Cornwall	22,000	22,000	22,000	25,667
Isles of Scilly	0	0	0	0
Devon and Severn	33,548	32,897	30,245	30,217
Southern <sup>5</sup>	Owned			
Sussex	38,794	42,875	41,217	40,897
Kent and Essex	26,821	25,832	27,935	28,332
Eastern	41,598	41,598	41,931	42,533
North Eastern	29,961	30,372	29,414	46,400
Northumberland	27,500	27,500	27,500	27,500
North Western	Data not available			

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<sup>&</sup>lt;sup>5</sup> There are additional costs for the upkeep of building (maintenance, rates, insurances etc) but these costs are not accounted for each year.

The consultation feedback highlighted several areas linked to funding as follows:

- Several IFCAs flagged issues and concerns with funding levels within their responses.
   This included the uncertainties associated with reliance on Defra's "New Burdens" funding, and the resulting challenge in aligning IFCA activities with emerging opportunities and threats. In addition, as certain research activities are applied for and then funded as projects, they are inherently short-term and cannot provide long-term assets or funding security.
- The need to innovate due to funding restrictions was also highlighted by the Chief Officers, with the piloting of new approaches to monitoring that may represent greater cost effectiveness. One IFCA has been relying on general reserves funding to maintain their ability to meet their statutory duties, due to the un-ringfenced grant funding framework where funding has not been given over to IFCA budgets. Specifically, a lack of staff has impacted on their ability to fulfil some Annual Plan commitments to deliver fisheries management in the reporting period. This IFCA saw a 50% turnover of staff in 2018 and 2019, with employees referring to the ongoing uncertainties of funding, high workloads, and lack of resources as reasons for leaving.
- Several fishers commented on staff turnover at their IFCA, suggesting this held implications for institutional knowledge and building trust between the IFCA and fishers.
- Several fishers felt that their IFCA concentrated their funding on purchasing new
  assets such as new vehicles, which had left limited resource for day-to-day activities
  and functioning of their IFCA. Stakeholders from one district commented that they did
  not feel enforcement activities represented value for money. Conversely in some
  regions stakeholders felt that there was limited resource for enforcement in their
  district.

## Case Study 1

#### **Cornwall IFCA**

CIFCA staff were issued with laptops and other equipment via Cornwall Council IT support to enable effective home working and regular staff and team meetings were held online to co-ordinate work and keep our staff up to date with changing circumstances and ensure that they felt supported. New digital ways of working had to be rapidly developed to support financial and administrative processes. Additional PPE and testing equipment was sourced and issued alongside new covid specific risk assessments also shared with other IFCAs to assist with consistency.

# Annex E: Theme 2: Engaging Stakeholders and Working in Partnership

IFCAs outlined various means and methods for regular engagement with a significant range of stakeholders, governed by communications and engagement plans/ strategies, and underpinned by stakeholder databases, both of which undergo regular reviews. Examples of the diverse range of stakeholders that Chief Officers provided were other IFCAs, fishers and associations, core Defra and other ALBs (particularly MMO), academia, project groups, and members of the local community. Communication methods were tailored for specific stakeholders and workstreams, and included face-to-face, online/ hybrid meetings, IFCA websites, text, email, phone, print media, letters, and social media. One IFCA noted that they enlist the services of a communications advisor when required.

Generally, stakeholders from all IFCAs felt that they could contact their IFCA representatives when needed. Of 40 Qualtrics respondents, all knew how to contact their IFCA. Of 79 respondents who indicated how they engaged with their IFCA, the most common method was through email (58 respondents), followed by taking part in consultations (48 respondents), contacting an IFCA Member directly (44 respondents), or going to the IFCA website (43 respondents). The least common way stakeholders engaged with their IFCA was through reading authority meeting papers (38 respondents), attending authority meetings (32 respondents), or through social media (15 respondents). In quayside conversations stakeholders reiterated a desire for face-to-face communication and indicated that online approaches didn't reach some, in particular older members of their community.

Many respondents commented that they felt IFCA officers were an important part of explaining fisheries issues to members. Fishers also reflected positively on the role that science and research projects played in proactive communications and engagement from their IFCA, stating that being involved in these meant they were often kept up to date with ongoing activities. IFCAs also outlined their engagement with partners on a range of collaborative projects, in part through the provision of local data and expertise. Another example of engaging stakeholders was reporting progress on managing a complex network of MPAs to the House of Commons, both celebrating that progress and increasing awareness.

Formal public engagement included calls for information and formal consultations, supporting management measures being refined over time, and informal engagement on numerous workstreams as well as early stages of byelaw development. IFCAs stated that their decisions were made public to support transparency and accessibility.

There were concerns amongst fishers that IFCA consultations were conducted to satisfy convention and regulations rather than to allow for meaningful input into management decisions. Terms such as 'token' were used to describe their experience of consultations. Stakeholders raised concerns that communications around specific activities or consultations had been either insufficient or had taken place during busy periods (e.g. the two weeks either side of Christmas), which reduced input and involvement of multiple groups. Stakeholders from several districts suggested that based on difficulties in communicating with their IFCA in the past they would instead opt to contact MMO when encountering an issue.

Examples of how IFCAs identify and prioritise the issues facing their local areas include internal discussions, communication with and feedback from local stakeholders, and

guidance from other organisations. Priorities are also informed through intelligence sharing with the MMO, including through monthly tasking and coordination group meetings to inform priorities and joint working opportunities.

In several cases, anglers and commercial fishers involved in quayside conversations felt their IFCA could better indicate and evidence where multiple viewpoints had been considered in decision-making and wanted their IFCA to adopt a broader range of methods of engagement to ensure all stakeholders received communications around IFCA activities. Quayside conversations also highlighted differences in the degree to which resources and explanations of management measures were available online for different districts.

## **ALB partnership working**

IFCAs outlined their desire to work in partnership with other Arm's Length Bodies of Defra Group to develop best practice in the pursuit of shared priorities. This included data sharing agreements and joint patrols with the MMO, surveys delivered in partnership with other organisations, and the sharing of enforcement records, intelligence and assets.

IFCAs attend various fora to coordinate their policy and practice, ensuring consistent coverage of management, with alignment across administrative boundaries where appropriate. These include those mentioned elsewhere in this report, such as the National Intelligence Marine Enforcement Group, Technical Advisory Group, and Chief Officers Group. IFCAs highlighted developing byelaws and permits, aligning measures, implementing ecosystem services, and adapting technologies as areas that benefit from the sharing of advice and technical support.

The Qualtrics and Citizen Space surveys also gauged 66 respondents' level of satisfaction with the way their IFCA had worked with the Marine Management Organisation (MMO) and the Environment Agency (EA) between 2018-2022. Many of those surveyed – 23 of 66 and 26 of 66 for the MMO and the EA respectively - indicated they held 'No Opinion'.

18 of 66 respondents were either 'Satisfied' or 'Very Satisfied' with the standard of their IFCAs communication with the EA, 11 stated they were either 'Dissatisfied' or 'Very Dissatisfied', 11 indicated that they were 'Neither Satisfied nor Dissatisfied'.

16 of 66 respondents were either 'Satisfied' or 'Very Satisfied' with their IFCAs communication with the MMO, 19 stated they were either 'Dissatisfied' or 'Very Dissatisfied', and 8 were 'Neither Satisfied nor Dissatisfied'

## Online engagement

Stakeholders commented that their IFCA has increased its focus on written and online communications when conducting outreach. Some respondents felt that this affected response rates to consultations and calls for evidence, with implications for meaningful engagement of stakeholder groups.

Some stakeholders reflected positively on the increased move toward online engagement, highlighting travel time to meetings as a factor that had previously affected their ability to participate. One General Member suggested that moving to voting online had been a positive move during the pandemic but expressed disappointment that this option was subsequently discontinued when in-person activities resumed following the repeal of Local Government Covid Regulations that had enabled online voting.

## **Balancing local sectors**

To balance often competing interests and needs of local sectors and communities, communication methods were tailored to the unique features of the stakeholder group being targeted. With the full scope of engagement outlined encompassing numerous national and regional sector/ industry/ community/ technical groups and forums, IFCAs were able to consider views from across this spectrum.

IFCAs must seek to balance the social and economic benefits of exploiting the sea fisheries resources of the district. Evidencing this requirement, the IFCAs promote and support local businesses in several ways. For example, supporting industry-led Marine Stewardship Council accreditation and adoption of voluntary measures, and engaging with small scale research projects alongside larger-scale marine developments. Work in this space also includes collaborating with other ALBs and government departments to aid public awareness of fishing and promote local caught fish, examining marketing and development opportunities, and helping the fishing industry to understand the process behind management interventions and permit condition reviews.

Another case study was shared to demonstrate how heritage and tourism were considered within decision making, with the acknowledgement of historically important fishing grounds that support the local economy in part through the economic benefit of tourism. This was considered alongside the need to protect a marine conservation zone, reconciling the views of various site users who share the goal of sustainable management.

Feedback on the clarity with which measures were explained varied by stakeholder. Of 17 inshore fishers surveyed, 9 felt that management measures were not explained clearly, while 5 suggested they were. Among 6 recreational anglers, 3 felt that measures were well explained, with none suggesting they felt measures were unclear. 3 expressed either no opinion or were unsure. There were differences between IFCA districts relating to how easy members of the public felt that they could access resources or information on management measures, including online.

Some IFCAs outlined the challenge of working on contentious workstreams that highlighted differences in stakeholder opinion. One IFCA outlined the need to listen to and carefully address stakeholder concerns and ensure stakeholder views are reflected in the policy development process. Several fishers raised concerns that enforcement and correspondence around regulatory issues were often communicated by written text, which was an issue for fishers who may have trouble reading or writing. Fishers in one district suggesting that the impact of possible management measures was not adequately conveyed at consultation. In part this was attributed to difficulty understanding and responding to consultation documents.

Fishers engaged through quayside conversations indicated that meetings were not held close enough to their communities or home ports, affecting their ability to attend, and felt that fewer quayside visits had occurred since the pandemic. Fishers commented on the question of costs, expenses, and lost time to attend IFCA meetings, noting that they are often held at times when they would either be fishing or working on maintaining their vessels. A number questioned why local authorities provided fees for their members to attend whilst fishers did not receive similar reimbursement. Fishers in some districts noted that a negative relationship between the IFCA and communities can affect the degree to which people are willing to engage in local initiatives the IFCA are involved with.

## COVID-19

Adapting to the COVID-19 pandemic, the meetings of numerous IFCAs were moved online, accelerating the later establishment of hybrid meetings, and online attendance of local stakeholder group meetings. One IFCA noted that authority meetings are now livestreamed publicly, and subsequently shared online alongside published supporting materials. IFCA websites and social media were also utilised to share targeted information and guidance, to improve the user experience and increase reach.

During the pandemic, a joint IFCA/ MMO strategic COVID response group was established to ensure a nationally joined-up approach, overseeing the development of shared polices and addressing shared challenges. This then supported IFCAs to maintain a consistent compliance presence within the limitations of COVID-19 protocols and safe working practices.

Throughout the pandemic, specific covid risks assessments, including those for both environmental and enforcement activities, were developed and shared between IFCAs to ensure consistency of approach alongside the sourcing and testing of PPE. These assessments resulted in the creation of policies and procedures designed to protect staff while maintaining the delivery of statutory functions, allowing all business-as-usual activities to be undertaken safely.

Stakeholders felt that limited interactions over the pandemic meant that management was sub-optimal, and difficulties in licencing acquisition were highlighted. Others commented that levels of engagement had not returned to pre-pandemic levels for many districts and that their IFCA has increased its focus on written and online communications when conducting outreach. Some respondents felt that this affected response rates to consultations and calls for evidence, with implications for meaningful engagement of stakeholder groups. Several fishers highlighted the impact of the COVID-19 pandemic on the ability for sampling or other research projects to be undertaken or completed.

Fishers also commented that their IFCA adapted well to COVID-19 restrictions, with one IFCA arranging letters so that fishers in their region could continue to work as key workers. It was suggested that increased agency for fishers during this period was important to ensure that fisheries could remain functioning.

## Case study 2

**Cornwall: Collaboration** 

The largest CIFCA research project in 2021 was the identification of the seagrass extents in the Fal and Helford SAC. This project was carried out in collaboration with the University of Exeter who were carrying out a contract from Cornwall Council as part of the Defra Local Nature Recovery pilot. The survey work was carried out using the Biosonics MX Scientific Echosounder from the survey vessel. The MX data acquisition software analyses the acoustic returns from the echosounder and provides a real time echogram which shows when sea grass or algae are present. During eight survey days, 407 survey lines were completed over nine seagrass beds. This technique was also deployed in Mounts Bay to support another seagrass survey as part of the above pilot project. Further surveys were conducted in the Plymouth Sound and Estuaries SAC, with the aim of sharing this data reciprocally with the Environment Agency who had undertaken another survey on the Whitsand and Looe Bay MCZ. In total, these surveys have mapped seagrass beds in four MPAs, which has added substantially to the overall mapped extent of this species in the UK and is a great example of collaborative work, where data can be collected once and used many times.

## Case Study 3

Eastern IFCA: Cromer Shoal Chalk Beds Marine Conservation Zone project (the MCZ)

In August of 2020, Natural England advice concluded that the pot-based fishery within the MCZ was hindering its conservation objectives, and that management was required in the form of Adaptive Risk Management (ARM).

The MCZ includes areas which are historically important fishing grounds, supporting small scale fishing operations which in turn supports the local economy (including through tourism) and underpins the sense of place for the coastal community. In addition, the site is a treasured dive location with features unique to the UK. In both senses, the site engenders a strong sense of feeling from stakeholders who passionately protect their link to the site.

Eastern IFCA established a Project Board to oversee the delivery of ARM, two Task and Finish groups to undertake necessary work.

Stakeholder involvement is critical to delivery of ARM and to that end a bespoke Communication Strategy was developed. This seeks to reconcile the views of the sites varied users and draw on the shared goal of protecting the site. To facilitate engagement a Stakeholder Group has been established and is co-ordinated by the Marine Conservation Society on behalf of the Project Board. As well as keeping stakeholders informed, an objective of the group is to facilitate engagement with and contributions to the ARM project.

The Project Board and Task and Finish Groups have drawn on the knowledge and expertise of local stakeholders including the fishing industry, beach cleaners and divers in addition to Natural England to develop solutions for managing the site. This work has included development of voluntary measures to reduce the risk of losing pots at sea which can damage the site, a community-based approach to identifying, monitoring, and recovering lost gear within the site and research on gear modification trials.

## Case study 4

#### **Kent and Essex Fish Local**

As the country entered lockdown in spring 2020 KEIFCA worked with a group of partners and fishermen to launch Fish Local, a project that aimed to connect the local community with the local fish supply, by using the power of social media. Working with industry leaders and a local media and communications company (Band Agency), in 17 days we set up a website and social media pages, then worked with a PR company and local fishermen to help promote the site and the local industry. Features on regional BBC and ITV news as well as 'This Morning' helped raise the profile of the project as well as numerous articles in the regional written press.

## Case study 5

**Kent and Essex IFCA: Listening Phase** 

As part of their cockle management review, Kent and Essex IFCA's 6 weeklong 'Listening Phase' consultation started in September 2021 with emails being sent out to all relevant stakeholders on our database and a specific consultation questionnaire being posted on our website. KEIFCA officers worked with Thames Estuary Partnership to promote the consultation to the wider stakeholder community and reach stakeholders that were not in our database.

KEIFCA officers then started engaging with fishers around the coast and posters were put up and business cards handed out with key details of how and when to engage in the process. A 2-day filmed oral evidence session was arranged at a hotel in the centre of our district, where anyone could book a slot and answer a series of set questions or make their own points. The oral evidence session helped add a different type of evidence into the decision-making process and helped capture personal experience and examples which would have most likely become lost in the written evidence. Towards the end of the consultation Senior officers and admin staff reviewed the engagement response from the different sectors identified in the communication plan and based on this additional effort was made to re-engage with some sectors specifically, including re-sending emails or phoning up key individuals that could pass on information to others.

A total of 202 emails, 224 e-bulletins and 53 paper copies of the questionnaire were sent, in addition to 70 business cards which were distributed across the district by Fishery Officers. Of the 35 bookings for the oral evidence sessions 25 people attended and a total of 50 questionnaire responses were received.

## Annex F: Theme 3: Data and Evidence

## **Data Sources**

Many IFCAs outlined long-term research plans within annual planning, with identified evidence needs for management driving those plans, and progress in gathering and acting on evidence being included in reporting. IFCAs outlined a range of sources utilized to collect the best available evidence, including in-person and online stakeholder engagement, permit returns, internal research, statutory bodies, NGOs, universities and peer-reviewed literature, and citizen science. An increase in workloads arose across most IFCAs as a result of the designations of Tranche 3 Marine Conservation Zones by Defra in 2019 (Table 10).

Table 10. Numbers of designated Marine Protected Areas in each IFCA district where marine harvesting is known to occur, with percentage of district by area designated as MPA and percentage of assessments completed

IFCA	No. of designated MPAs* 18/19	No. of designated MPAs* 19/20	No. of designated MPAs* 20/21	No. of designated MPAs* 21/22	% district (by area) designated MPA in 2022	% of completed fisheries assessments in MPAs
Cornwall	14	18	18	18	51.3	79
Isles of Scilly	3	3	3	3	32	100
Devon and Severn	15	22	22	22	42.4	79.81
Southern	13	19	20	20	78.3	100
Sussex	10	10	11	11	35	73
Kent and Essex	27	29	29	29	71	89.7
Eastern	19	19	19	19	96	Highest risks completed
North Eastern	9	9	9	9	12	100
Northumberland	10	10	10	10	67	70
North Western	14	18	18	18	78	16

<sup>\*</sup>Number of designated MPAs where marine harvesting is known to occur

To aid the collection of evidence to support decision making and the delivery of objectives, IFCAs explored and used innovative approaches and technologies. This includes within

MPAs, where one IFCA partnered with Oceanmind to develop novel remote sensing tools for analysis of fishing activities. Another highlighted that innovations in quieter gear technologies are being explored and fed into a risk management strategy for endangered, threatened and protected species.

One IFCA outlined work to gather evidence to support IFCA objectives through an adaptive risk management approach, establishing research and management groups to coordinate evidence gathering and develop proportionate management that meets conservation requirements. These groups draw on contributions from IFCA staff, the fishing industry, Natural England, citizen science, and the Marine Conservation society.

One issue presented with this criterion was the resource-intensive demand on IFCAs to collect evidence where other ALBs were not forthcoming, due to the requirement to be evidence-based managers and work in accordance with the precautionary approach. As one IFCA set out, they could not monitor the effectiveness and impact of Minimum Conservation Reference Size increases due to resource constraints, and another could not demonstrate sustainable management best practice altogether due to a lack of data available for their relatively small district. In one case, all research was outsourced, which is an advantage in terms of being able to access a wide level of expertise, but a disadvantage since the IFCA does not build their own institutional expertise. Decisions were therefore based on a higher level of uncertainty.

When asked whether their IFCA responds appropriately when evidence changes, or new evidence emerges, of 90 respondents 30 stated 'No', 39 stated 'Yes', 10 were 'Unsure' and 11 indicated they held 'No Opinion'. In quayside conversations on the topic of evidence, and in free-text boxes in Qualtrics and Citizen Space, fishers in one district raised concern that they felt stock data used in management decisions had been inaccurate and felt that experiential knowledge was often not considered in evidence-based decision making.

In Qualtrics, 51 respondents answered the question: 'Between September 2018-August 2022, to what extent do you agree that IFCAs' decisions were supported by evidence that was fit for purpose?' Of these, 32 either 'Strongly' or 'Somewhat' agreed, while 17 either 'Strongly' or 'Somewhat' disagreed. 2 stated they neither agreed nor disagreed. That same 51 respondents also answered a question on whether they felt 'IFCAs' decisions were well-informed.' 32 either 'Agree[d]' or 'Strongly Agree[d]' with the statement, 15 either 'Disagree[d]' or 'Strongly Disagree[d], 3 neither agreed nor disagreed, and 1 indicated they held 'No Opinion'.

46 of 90 respondents from Citizen Space and Qualtrics indicated that it was 'clear how evidence was taken into account during the IFCAs' decision-making process'. 32 felt this was not the case, and 12 were either 'Unsure' or stated they had 'No opinion'.

Most respondents in Citizen Space and Qualtrics, 55 of 90, were aware of their IFCA publishing the scientific evidence it had used to support its management decisions. 29 stated that they were not aware of this, and 6 indicated that they held no opinion.

## **Data sharing**

IFCAs provided multiple examples of data sharing and stated that outcomes of collaboration contribute towards national marine monitoring programmes and reporting systems. The Technical Advisory Group was again highlighted as an effective forum for sharing experience and best practice on a range of subjects. One IFCA worked closely

with Cefas to support the processing and analysing of shellfish samples in relation to a multi-agency response into Paralytic Shellfish Poisoning events.

IFCAs also collaborated on shared projects with other ALBs, and organisations involved in MPA protection, such as working with Natural England on evidence gathering to inform assessments and subsequent monitoring and control plans for fishery impacts within Marine Protected Areas (MPAs) and working on a project to understand fishing pressure impacts on different habitats and generating information on the impacts of intertidal fisheries.

One IFCA utilised a local biological records centre to develop an interactive map that provided an accessible platform for the sharing of habitat, fisheries, and wider information with all stakeholders.

Inshore Vessel Monitoring System (IVMS) data on inshore vessels, as provided by the MMO, is also used to assess fisheries displacement and the economic impact of Highly Protected Marine Areas (HPMAs). For example, one IFCA noted engagement with the strategic compensation measure planned for a windfarm development, which was proposed to be the extension of a Special Area of Conservation into inshore waters. This IFCA objected on the grounds of restriction of fishing opportunities. Illustrating the need to consider displacement and economic impacts, one IFCA noted that 96% of their district was covered by one or more forms of MPA designation, putting significant spatial squeeze on the inshore industry, and another highlighted pressures to marine industrial projects such as wind farms compounding this issue further.

## **Evaluating interventions**

The principles of ecosystem management and protecting natural capital were highlighted by IFCAs as supporting byelaw development, with direct support for Defra's marine natural capital ecosystem assessment programme also highlighted. One IFCA called Habitat Regulation Assessments (HRAs) the best tool to demonstrate sustainable marine management, stating that HRAs "can define and present the case for the best fishing technique for a fishery as well as the times when fishing is least damaging and the number of fish that can be taken safely."

One IFCA added that evidence is collected after new management measures have been implemented, to demonstrate the extent of effectiveness of intervention. This includes routine monitoring, benthic surveys, work with universities on the impact of fishing, specific monitoring of indicators for new management, and permit returns data.

Another outlined the ways they measure impacts from across different fisheries operating in the district, such as fishery-specific monitoring and control plans that use empirical reference points such as catch-per-unit of effort, annual stock assessments and surveys to measure fisheries resources, and the measurement of stakeholder perceptions through consultations, community forums, and engagement on the coast. One IFCA highlighted socio-economics impacts being measured through the information provided in permit returns.

## Stakeholder input

Stakeholders felt that evidence provided to IFCAs was not always passed on to its intended recipients and that this was occasionally reflected in the content of reports and other outputs. Fishers also stated that they did not feel comfortable providing their IFCA

with information, over concern that it could be used to implement management restrictions that would negatively affect their livelihood.

Fishers in one district stated they would like to see greater encouragement of fishers to engage in data collection for science programmes, as a way of building trust and transparency. A number of fishers suggested that IFCAs should invite contractors or industry to undertake science projects more often.

## Case Study 6

#### **Cornwall IFCA:**

Post-implementation monitoring is usually of fishing activity rather than the condition of an MPA itself, for example, as this is the responsibility of Natural England. However, CIFCA was a key partner in a six-year collaborative project with the University of Exeter, Marine Conservation Society and other partners to assess the recovery of subtidal habitats in response to a CIFCA byelaw restricting the use of bottom towed gear within the Eddystone Special Area of Conservation (SAC). Our research vessel collected remote sensing data including drop down video and stills of benthic habitats, which were analysed to compare changes in the biotopes present both inside and outside the restricted areas. This work was published in 2021.

# Annex G: Theme 4: Fisheries Management

The IFCAs role in the management and conservation of marine resources, including fisheries, is vital to ensuring that fishing practices balance ecological integrity with the livelihoods of local communities. The need for fisheries management measures arises from a variety of sources and evidence including when byelaws made under MaCAA are reviewed.

IFCAs have a variety of mechanisms available to them to regulate fisheries, including developing voluntary codes of conduct and byelaws. Decisions on the type of management measure that is most suitable is made by Authorities, using recommendations from Working Groups or sub-committees. Most IFCAs also rely on Sea Fisheries Committee byelaws made before 2011, where it is appropriate to do so (Table 11).

Table 11. Number of legacy byelaws (pre-2011) in affect across IFCA districts

IFCA	(pre-2011) byelaws in	No. legacy (pre-2011) byelaws in effect 19/20	(pre-2011) byelaws in	(pre-2011) byelaws in
Cornwall	18	18	18	18
Isles of Scilly	0	0	0	0
Devon and Severn	29	29	29	29
Southern	21	21	20	16
Sussex	6	6	5	5
Kent and Essex	50	49	40	36
Eastern	17	17	17	17
North Eastern	15	14	12	12
Northumberland	0	0	0	0
North Western	26	23	23	23

Defra issued guidance to the IFCAs on their byelaw making powers set out in sections 155 to 164 of MaCAA (2009). The guidance sets out the roles and responsibilities of all those involved which includes the MMO who act as a policy and legal advisor on the process of

making IFCA byelaws. All byelaws should be based on sound evidence, decision making and appropriate consultation.

Table 12. Number of byelaws introduced and revoked in each IFCA district during reference period

IFCA	No. byelaws introd- uced 18/19	No. byelaws introd- uced 19/20	No. byelaws introd- uced 20/21	No. byelaws introd- uced 21/22		No byelaws revoked 19/20	No byelaws revoked 20/21	No byelaws revoked 21/22
Cornwall	3	1	0	0	0	0	0	0
Isles of Scilly	0	1	1	1	0	0	0	0
Devon and Severn	1	0	1	0	1	0	0	0
Southern	0	2	1	2	0	2	4	0
Sussex	1	0	1	0	1	0	1	0
Kent and Essex	1	0	1	2	1	0	9	4
Eastern	2	3	1	2	1	0	0	0
North Eastern	1	3	1	0	2	2	0	0
Northumber -land	1	1	1	2	1	1	1	1
North Western	1	0	0	0	3	0	0	0

IFCAs use informal consultation to gather evidence from stakeholders and this is a critical part of ensuring stakeholders can shape the development of the management measure from an early stage. IFCAs follow a process outlined in Defra guidance when making byelaws, which includes advertising any byelaw and running a formal consultation which informs an Impact Assessment which is considered alongside the byelaw. IFCAs will seek independent legal advice on the drafting of a byelaw, prior to it being made and submitted to the MMO for quality assurance. The Defra Secretary of State has responsibility for confirming byelaws; in practice this is delegated to senior leaders in Defra where the byelaw is not controversial. The byelaw process can be a time- consuming process which requires significant resource. As a result, a relatively small number of byelaws are made and confirmed each year (Table 12).

IFCAs also have powers to make emergency byelaws where it considers there is an urgent need to make the byelaw could not reasonably have been foreseen. Emergency byelaws take effect without confirmation from the Secretary of State but do not remain in force for longer than 12 months. An IFCA may extend that period once and by no more than 6 months. Emergency byelaws are a management tool for exceptional circumstances and require a decision from the IFCA's committee who consider the evidence available. Table 13 shows the number of emergency byelaws that were made during the reference period.

Table 13. Number of emergency byelaws made and revoked during reference period.

IFCA	No. emergency byelaws made 18/19	No. emergency byelaws made 19/20	No. emergency byelaws made 20/21	No. emergency byelaws made 21/22	No. byelaws revoked 18/19	No. byelaws revoked 19/20	No. byelaws revoked 20/21	No. byelaws revoked 21/22
Cornwall	0	0	0	0	0	0	0	0
Isles of Scilly	0	0	0	0	0	0	0	0
Devon and Severn	1	0	0	0	0	0	1	0
Southern	0	0	0	1	0	0	0	1
Sussex	0	0	0	0	0	0	0	0
Kent and Essex	0	2	0	0	0	0	1	1
Eastern	1	1	0	0	1	1	0	0
North Eastern	0	1	0	0	0	0	1	0
Northumber- land	1	0	1	0	1	0	0	1
North Western	0	0	1	0	0	0	0	0

Feedback on fisheries management was mixed. Some respondents felt that their IFCA was well managed across the period, noting strong engagement of their IFCA with other government delivery bodies on issues such as the Green Island Dredge Closure Area Emergency Byelaw. Fishers also commented positively on conservation and bass

protection measures, the Poole shellfish byelaw, and regulations introduced on berried lobsters, feeling that this had been a strength of their Authority's management in recent years.

On the other hand, stakeholders pointed to the decline in Pollack stocks, sole fisheries, and contentious estuary netting proposals as examples where management had been ineffective for some stocks or issue areas. Fishers in the two districts reflected negatively on the management measures introduced for their cockle fishery, with stakeholders in one suggesting that the impact of possible management measures was not adequately conveyed at consultation. In part this was attributed to difficulty understanding and responding to consultation documents.

Across Qualtrics and Citizen Space responses on the topic of trust, 47 of 100 respondents trusted their IFCA as a fisheries regulator, whereas 41 did not. 11 expressed a neutral stance.

Among specific stakeholder groups levels of trust were highly variable. General members and Local Authorities had high levels of trust in their IFCAs, with 15 of 19 and 7 of 8 respondents from these groups respectively stating that they either somewhat or highly "trusted [them] as a regulator." For other stakeholders, this figure was lower: 3 of 17 inshore commercial fishers, 3 of 24 members of the public, 2 of 6 of anglers, and 9 of 18 NGO representatives stated they either somewhat or highly agreed that their IFCA was a trusted regulator.

Several fishers felt that management measures affected their ability to invest with confidence in their vessels or equipment, noting the industry feels highly uncertain due to perceptions of tightening and rapidly changing regulations. Of 73 respondents across Citizen Space and Qualtrics, 27 felt that fisheries management had been well explained to those affected, while 32 felt clarity on measures was poor or very poor. 10 indicated a neutral stance on this issue and 4 indicated 'Don't Know'.

#### Balancing local and national priorities

The byelaw system allows for management to be regionally tailored around the coast, accounting for local needs. IFCAs stated that options for implementation are considered and presented in reports to members for agreement. In some cases, flexible permit conditions are utilised, allowing management to be tailored on a fishery-by-fishery basis. Management measures may be changed in response to national policies being introduced, new fisheries emerging in the district, engagement with stakeholders, and new MPAs and features within MPAs being designated. Most of the IFCAs still rely on a number of Sea Fisheries Committee byelaws, known as legacy byelaws (Table 11), though the number is gradually reducing as new management measures are developed.

In some cases, these measures are then included in IFCAs own fisheries management plans, alongside steps to enhance further knowledge of the condition of the stock and associated environmental impacts. Measures can be underpinned by regulatory impact assessments, with impact being considered through tailored monitoring programmes that compare local trends to the national picture.

IFCAs stated that they have also supported the implementation of the Fisheries Act 2020, sitting on various national stakeholder engagement groups/ industry advisory groups, to contribute towards the Joint Fisheries Statement consultation and the development of national Fisheries Management Plans (FMPs).

However, when working with Defra and the MMO to confirm the introduction of new byelaws, several issues were highlighted by IFCAs as impacting on timelines. In one case these issues resulted in several byelaws taking three years between creation and confirmation. Issues outlined were conflicting legal and policy opinion through MMO and Defra processes, amendments required as a result of the byelaw review process, and an increasing amount of national policy from Government impacting on capacity. This constant change in national fisheries management has also made it difficult to plan beyond a one or two years at the local level, although identifying drivers and priority workstreams has mitigated this to some degree.

Feedback from stakeholders engaged at the quayside suggested that they did not always feel their IFCA did not struck the correct balance between conservation, financial considerations, and sea resource use. Inshore commercial fishers stated that their IFCA had prioritised enforcement and conservation and did not feel that they were given equal consideration with other sea users. In some cases, they perceived that conservation interests could outweigh considerations of economic and social benefit to coastal communities. One fisher suggested that they would like to see a greater focus on 'whole ecosystems functioning' consideration in management and byelaw creation, including social impacts.

Some fishers also felt that the strict spatial boundaries and differing byelaws between IFCAs was hampering their ability to develop cross-boundary management solutions or work in a more collaborative manner. Overall, the perspectives on balancing the priorities of the marine environment and fisheries were strongly divergent between stakeholder groups.

Stakeholders were asked whether their IFCA balanced priorities for fisheries management and the marine environment. Of 91 respondents from groups in Citizen Space and Qualtrics, 30 felt that their IFCA balanced their responsibilities to contribute to sustainable fisheries and protect the marine environment, 20 of the 91 felt that fisheries were prioritised, while 26 considered the marine environment to have been prioritised.

When split by stakeholder group, 3 of 17 IFCA general members, 2 of 4 of anglers, 5 of 23 members of the public, 3 of 18 of NGO representatives, and 2 of 13 of inshore commercial fishers felt that fisheries were prioritised by their IFCA. 9 of 18 NGO representatives, 6 of 13 of inshore commercial fishers, and 8 of 23 members of the public felt that the marine environment was prioritised. 5 of 18 NGO representatives, 4 of 23 members of the public, and 1 of 13 inshore commercial fishers felt that priorities were balanced.

When asked through Citizen Space and Qualtrics how well their IFCA had accounted for the local needs of sea fisheries resources within their district, 39 of 91 respondents felt this had been done 'poorly' or 'very poorly', 14 indicated a neutral stance, and 32 felt their IFCA had done 'well' or 'very well'. 6 had no opinion on the matter. Among different sea users, inshore commercial fishers had a particularly high level of dissatisfaction with their respective IFCAs on this topic: a majority, 10 of 13, indicated that local needs of sea resources had been 'poorly' or 'very poorly' accounted for. IFCA General Members felt their IFCA had responded well to local needs: a majority, 11 of 17, answered either 'well' or 'very well' to this question.

#### Protected sites and features

Management measures are enhanced for protected marine areas and features, such as those found within MPAs and HPMAs. IFCAs noted that managing the risk to these sites and features is a high-priority, resource-heavy element of their work, and education is an important foundation for generating compliance to mitigate the need for enforcement. One example given for this was the publication and signposting of information, including MPA locations and byelaws.

Many IFCAs referenced protected site-specific evidence collection, which was often reported in impact assessment documentation for management options. One IFCA stated that MPA site regulation is reviewed on a 4-year cycle, with reviews being incorporated into strategic plans for that area. Another noted that information collected is fed into IFCAs own fisheries management plans and monitoring and control plans. Data to assess the impact of potential management measures is collected through fishery dependent and independent data, with examples given including surveys, catch and effort monitoring, HRAs and MCZ assessments, biometric information, spatial data, observer programmes, and engagement with academia.

One IFCA stated that detailed monitoring of effort within these areas was provided via a newly added requirement to the permit system. As a result, failure of the requirement to submit this data monthly would result in a breach of the byelaw. This allowed the IFCA to retain oversight of the way in which the levels of activity and effort within the site are distributed, taking action to ensure that no significant increase in effort takes place, in turn helping to achieve the conservation objectives of the site.

Data collected through surveys included an echogram to determine the presence of seagrass or algae, mapping seagrass beds in four MPAs, and substantially adding to the overall mapped extent of this species in the UK. Another survey was conducted by an IFCA in partnership with Natural England to map the distribution of reefs within a Marine Conservation Zone via sonar and a sound camera. This expanded their knowledge of key Sabellaria reef locations in the MCZ area, and consequently their ability to provide adequate protection to them. Examples of academic support include a project to understand fishing pressure impacts on different habitats, understanding the impacts of potting on reef biotopes, and generating information on intertidal fisheries and their impacts.

HRAs also take account of providing feeding grounds for bird populations, ensuring their sustainability alongside sustainable fisheries. In one IFCA, a fixed netting regulation was introduced to enhance protection for a sea bird colony estimated to total a population of 412,000. In another, annual intertidal and subtidal bivalve surveys in estuaries were used to inform both stock assessments and bird food models.

One stakeholder noted that where management interventions that would impact local fishers and stakeholders are proposed based on the precautionary approach, as advised by statutory nature conservation bodies, this can be difficult to communicate to stakeholders and risks damaging relationships. Collecting further evidence helps to determine if the fishery is impacting on a protected feature, but this can take significant resource.

## **Spatial closures and pressures**

Alongside protected areas, IFCAs noted that other marine projects such as windfarms and cable laying further restrict access to available grounds for the fishing industry, leading to spatial squeeze. It was also noted that larger vessels operating close to the 6 nautical mile boundary can further exacerbate this issue, and lead to conflicts between sectors.

Given this spatial pressure, the necessity of ensuring that the evidence justifies management intervention was highlighted. Vessel Monitoring Systems (VMS) data provided by vessels was stated to be invaluable in assessing fisheries displacement and the economic impacts of protected areas. One IFCA also worked with NE and Defra to assess potential fisheries displacement and economic impact resulting from HPMAs proposed by the Benyon Review into Highly Protected Marine Areas 2022. Where sites have been closed, some are periodically revisited to determine whether closures are still appropriate or require updating.

To mitigate the impacts of spatial pressure, one IFCA outlined a compromise that balances an area that excludes trawling on sensitive and protected habitats, and an area where trawling at a small scale is managed through a permit scheme. Another implemented an emergency byelaw to address the significant challenge resulting from a sudden influx of nomadic scallop dredgers seeking to move onto inshore fishing grounds. Further examples reported by IFCAs included a risk register of gear and feature interactions, and an approach of adaptive risk management as a method to avoid spatial closures on a precautionary basis.

## Case study 7

## Cornwall – use of new technology

In order to collect detailed data on fishing activity to inform management, Cornwall IFCA installed low-cost vehicle tracking units on volunteer vessels using a range of fishing gears. By filtering the tracking data, it is possible to determine patterns of fishing activity, for example when the vessel is transiting, shooting and hauling. One vessel has an ID beacon attached to the starboard trawl door. The beacon connects to the tracker unit via Bluetooth so whilst the door is out of the water, the beacon shows as connected. When the door goes into the water, the connection is lost and shows as such on the vessels' tracking data. Although speed is a good indication of fishing activity, the ID beacon allows a more accurate indication of when fishing occurs. The next phase of this work, using grant funding from Natural England, will involve the use of radio frequency identification (RFID) equipment to remotely monitor the use of static gear.

## Case study 8

#### Southern IFCA:

The Poole Clam & Cockle Fishery Partnership Project was funded by the MSC OSF and centred around the management of the fishery in relation to protecting ETP species. The project was a joint venture between Southern, PDFA and DWT aiming to establish a co-management system to support fishers to minimise interactions with ETP species. Education materials were developed to include waterproof guides, interpretation boards and a training program for fishers and IFCOs. Fisher-dependent data collection was developed alongside a fishery-independent observer program which provided quality control and fishers' innovations in quieter gear technologies were explored. Outcomes of the project fed into the production of a RMS which considered an adaptive approach to ETP species management incorporating significant stakeholder involvement and elements of co-management. The RMS is designed to be used by other fisheries including those looking to achieve MSC certification and aims to help address Fisheries Objectives under the FA.

# Annex H: Theme 5: Compliance and Enforcement

## **Strategy**

The majority of IFCAs undertake their enforcement activities in line with an established governance system in pursuit of a proportionate risk-based approach, including compliance and enforcement strategies, policies, and plans. These strategies are informed by various inputs including risk analysis, legal scrutiny, and intelligence and data gathering. Defra issued guidance to the IFCAs on the establishment of a common enforcement framework in 2011 from which individual IFCAs developed their compliance and enforcement strategies, policies and plans.

Where such a system is not in place, this may be due to a lack of resources and evidence of infringements, with one respondent highlighting that compliance by consensus is the objective, of which education and advice to stakeholders are key elements. One IFCA stated that despite this proactive planning, they still retain a degree of flexibility with their approach, allowing them to respond to emergencies and manage unforeseen issues.

When asked about the issue of enforcement, of 55 total respondents in Qualtrics 48 were aware of their respective IFCAs enforcement policy. This included 6 of 6 of anglers, 11 of 13 inshore commercial fishers, 5 of 6 local government representatives, 2 of 2 NGO representatives, and 16 of 18 IFCA general members.

87 respondents from all stakeholder groups in Citizen Space and Qualtrics were asked whether their IFCAs enforcement policy clearly explained enforcement decisions. 44 of this 87 agreed or stated that their IFCAs enforcement policy was clear, 16 indicated that it was not. The remaining 27 stated they were unsure or provided a neutral answer.

Multiple respondents felt that their Authority placed too much emphasis on enforcement. Fishers from several districts felt that an emphasis on enforcement was affecting their wellbeing and causing increased stress. Several fishers felt that enforcement activities had increased in frequency, since the end of pandemic restrictions.

#### Coordination

IFCAs use various forums and methods through which they plan and coordinate their enforcement activities, using a consistent approach where possible, but also tailoring that for regional differences where necessary. Data that informs activity trigger levels is monitored and discussed to assess potential management responses, and best practice on targeted actions is provided by alignment with the National Intelligence Model, which outlines best practice for targeted law enforcement and is used by several other agencies.

IFCAs stated that it does this in part by setting out a method for managing enforcement activity, alongside benchmarked objectives and tactical activities, ensuring that the available resources are not unintentionally directed toward one fishery or area. Key seasonal fisheries can be targeted through specific Operation Orders, and spatial intelligence can be reviewed by Tasking and Coordination Groups (TCGs). These groups also identify compliance and engagement priorities, informed through intelligence gathering and regular briefings to support good decision making.

Alongside partnership working and data sharing through the Association of IFCAs (AIFCA), other shared forums include the National Inshore Marine Enforcement Group (NIMEG) and MMO Tactical Coordination Group (TCG), where national best practice for

compliance and enforcement is developed and shared with IFCAs, MMO and other agencies. Other agencies involved in patrols were presented as the Police, Local Authorities, Environment Agency, Natural England and the Gangmasters and Labour Abuse Authority, allowing for the building and sharing of experience.

IFCAs also have memorandums of understanding with the MMO for the chartering of IFCA vessels for enforcement activities and joint patrols, cross warranting to share duties, and input data from boarding and inspections to MMO's national Monitoring Control and Surveillance System (MCSS).

With a sample of 23 respondents, 13 felt that their IFCA considered how neighbouring IFCAs and other marine regulators approached enforcement when undertaking activities themselves. In quayside conversations, fishers working across district boundaries reflected that gaining clarity on byelaws could be an issue, and felt that enforcement, licencing and inspections for cross-boundary fishing activities could be better co-ordinated. In one district, some fishers commented that there was an imbalance in the way regulations were enforced for some and not others across gear types, species, and vessels.

## Inspections and enforcement decisions

IFCAs aim to achieve compliance through education, advice and guidance wherever possible. Where this has been unsuccessful IFCAs will use appropriate and proportionate action, which includes enforcement if necessary.

Examples of the kind of data monitored includes changes to fishing methods and patterns, compliance levels within key fisheries, intelligence reports and data collected during enforcement activities. It also includes effort distribution within protected areas, ensuring that no significant increase in effort takes place and possibly negatively affects the conservation objectives of the designated features within that area. In terms of businessas-usual risk management, many IFCAs use an adaptive risk management process, with risk assessments continually reviewed and included within enforcement strategies. Enforcement officers will also routinely inspect fishing equipment and fishing vessels ashore or at sea to ensure compliance with relevant legislation (Table 14 and 15). The data shows that IFCAs collate statistics in different ways. Chief Officers reported that the Covid-19 pandemic restricted their ability to monitor compliance in 2020 and 2021 and high fuel prices put pressure on revenue budgets when trying to maintain enforcement presence. IFCA's reported that monitoring continued using shore-based operations and remote monitoring of activities via Automatic Identification System (AIS) and Vessel Monitoring Systems (VMS) systems. At least one IFCA reported mechanical issues with their offshore asset.

Table 14. Number of sea-based activities associated with monitoring and compliance in each IFCA district

IFCA	Sea-based activity	No. of occurrences 18/19	No. of occurrences 19/20	No. of occurrences 20/21	No. of occurrences 21/22
Cornwall	Sea patrols	71	49	4	52
	Boardings/inspections	156	88	3	70
Isles of Scilly	Sea patrols	No data			,
	Boardings/inspections	No data			
Devon and Severn	Sea patrols	70	38	3	49
	Boardings/inspections	18	89	0	34
Southern	Sea patrols	89	97	83	71
	Boardings/inspections	260	287	21	70
Sussex	Sea patrols	80	69	92	59
	Boardings/inspections	80	28	5	9
Kent and Essex	Sea patrols	174	140	134	165
	Boardings/inspections	287	124	194	325
Eastern	Sea patrols	96	100	102	118
	Boardings/inspections	61	58	57	45
North Eastern	Sea patrols	136	126	64	13
	Boardings/inspections	317	69	0	0
Northumberland	Sea patrols	118	117	82	97
	Boardings/inspections	295	166	47	76
North Western	Sea patrols	74	71	51	54
	Boardings/inspections	85	496	683	578

Table 15. Number of land-based activities associated with monitoring and compliance in each IFCA district

IFCA	Land-based activity	No. of occurrences 18/19	No. of occurrences 19/20	No. of occurrences 20/21	No. of occurrences 21/22
Cornwall	Patrols on land	348	227	206	104
	Inspections	137	93	120	45
Isles of Scilly	Patrols on land	No data			
	Inspections	No data			
Devon and Severn	Patrols on land	33	36	2	23
	Inspections	5	45	21	9
Southern	Patrols on land	159	117	160	116
	Inspections	394	297	185	262
Sussex	Patrols on land	78	54	108	73
	Inspections	109	77	120	54
Kent and Essex	Patrols on land	162	171	309	268
	Inspections	499	246	331	249
Eastern	Patrols on land	421	378	476	388
	Inspections	1249	1179	1497	1039
North Eastern	Patrols on land	Daily	I	I	
	Inspections	339	378	232	174
Northumberland	Patrols on land	310	310	118	154
	Inspections	604	429	117	180
North Western	Patrols on land	935	1074	1142	1212
	Inspections	2453	5959	5873	2737

Of 67 respondents across Qualtrics and Citizen Space, 25 felt that their IFCA Officers had undertaken inspections fairly, with 14 indicating they either 'Disagree[d]' or 'Strongly Disagree[d]' with this statement. 8 of 67 indicated a neutral stance, and 20 indicated they had 'No Opinion' on the matter.

Across specific stakeholder groups, 5 of 13 inshore commercial fishers who responded felt that their IFCA Officers had carried out inspections fairly, with 4 indicating they either 'Disagree[ing]' or 'Strongly Disagree[ing]' with this statement. 3 of the 13 indicated a neutral stance, and 1 indicated that they had 'No Opinion'. Among 6 responses from anglers, 3 agreed inspections were carried out fairly, 1 expressed a neutral stance, and 2 disagreed.

There is a substantial difference between inshore fishers and all respondents regarding perception of the IFCAs explaining their enforcement decisions clearly. For inshore fishers, 3 of 11 felt that IFCAs explained their enforcement decisions.

Sanctions outlined include written warnings, cautions, fixed administrative penalties (Table 16), and ultimately prosecution in courts, with the decision to prosecute being informed by legal advice, and tests of evidence and public interest. IFCAs may receive a full or partial award of costs from court cases (Table 17).

Of 93 respondents across Qualtrics and Citizen Space, 37 agreed that "IFCAs gathered relevant and timely evidence to support enforcement actions", while 22 felt that they did not. There were some differences by stakeholder group. 5 of 6 of local authority members, 12 of 17 IFCA general members, and 4 of 6 anglers agreed that IFCAs gathered relevant and timely evidence for enforcement. Only 2 of 13 inshore commercial fishers agreed this was the case, while 5 indicated they disagreed, and 6 were unsure. Among the public, 10 of 23 disagreed, 8 agreed, and 5 held no opinion. 5 of 18 NGO representatives felt IFCAs did not collect timely evidence, 6 stated that they did, and 7 had no opinion.

Table 16. Annual totals of Fixed Administrative Penalties (FAPs) issued by IFCA

IFCA	Total of FAPs received 18/19 (£'s)	Total of FAPs received 19/20 (£'s)	Total of FAPs received 20/21 (£'s)	Total of FAPs received 21/22 (£'s)
Cornwall	5,250	6,750	0	500
Isles of Scilly	0	0	0	0
Devon and Severn	5,750	9,250	6,900	9,744
Southern	3,000	4,500	0	1,000
Sussex		500	0	1,750
Kent and Essex	1500	4,500	0	2,000
Eastern	0	0	1,250	1,250
North Eastern	7,500	5,500	17,950	1,750
Northumberland	3,000	3,000	2,250	2,250
North Western	Data not available			

Table 17. Total costs recovered from IFCA prosecutions decided in court

IFCA	Total recovered from court costs (£'s) 18/19	Total recovered from court costs (£'s) 19/20	Total recovered from court costs (£'s) 20/21	Total recovered from court costs (£'s) 21/22
Cornwall	11,318	7,505	592	9,349
Isles of Scilly	0	0	2,000	0
Devon and Severn	9,389	9,148	20,550	2,118
Southern	3,500	3,000	2,000	2,000
Sussex	7,959	770	4,986	196
Kent and Essex	496	6,539	0	0
Eastern	6,845	3,639	0	798
North Eastern	-11,765**	5,408	1,598	1,170
Northumberland	3,920	5,095	412	1,475
North Western	Data not available			

<sup>\*\*</sup> Negative value due to non-recovery costs and accounting purposes arising from previous year

## **Training**

IFCAs highlighted the extensive training undertaken by IFCA officers at cost to the IFCAs (Table 18), delivered through various means such as national specialists and systems, national IFCA training courses, locally sourced bespoke suppliers. Mentoring and development from senior officers was also highlighted, including from those who have held previous careers in enforcement agencies, such as the police.

One IFCA outlined a standardised training programme developed in partnership with the MMO which allows officers to demonstrate their professional credentials, and another stated that officers operating drones undertake rigorous training courses to achieve a Civil Aviation Authority drone pilot qualification.

Stakeholders in many districts commented that they had positive relationships with local fishery officers and representatives from IFCAs who come to ports and harbours, who they often viewed as fair and professional. However, many reflected that their relationship with the administration and more senior representatives of their IFCA was challenging or strained.

Fishers in quayside conversations commented on the volume of IFCA employees in their regions that had backgrounds as police officers or military personnel. They felt that this background contributed to their IFCAs particularly strong emphasis on enforcement; as a result, some reflected that they did not feel trusted by their authority. One fisher commented that inspections and interactions with their IFCA have been more combative since 2018.

Table 18. Number of warranted officers by IFCA and training costs for all staff

IFCA	Training costs (£'s) 18/19	No. warranted officers 18/19	Training costs (£'s) 19/20	No. warranted officers 19/20	Training costs (£'s) 20/21	No. warranted officers 20/21	Training costs (£'s) 21/22	No. warranted officers 21/22
Cornwall	9,391	6	6,984	6	12,385	6	17,207	6
Isles of Scilly	4,000	2	4,000	2	4,000	2	3,000	2
Devon and Severn	9,302	4	8,617	4	9,665	4	10,277	4
Southern	5,443	5	7,902	8	1,536	9	3,951	8
Sussex	6,045	8	16,654	8	7,587	8	15,219	8
Kent and Essex	21,003	13	18,099	13	10,004	11	7,370	13
Eastern	*n/a	11	*n/a	14	19,105	14	18,100	11
North Eastern	24,840	14	17,689	14	13,653	12	24,388	12
Northumber -land	23,196	10	10,714	10	7,284	10	14,264	10
North Western	*n/a	13	*n/a	13	*n/a	13	*n/a	13

Several respondents stated that they would like to see an increase in enforcement staff hired who had a background in the fishing industry. Commenting in both Qualtrics and as part of quayside conversations, some fishers felt that there was limited consideration or understanding of the reality of the fishing industry when undertaking or continuing with enforcement action by IFCAs.

#### **EU Exit**

During preparation and planning to leave the EU, IFCAs signed up to Memorandums of Understanding for the sharing of data and provision of vessels and officers should the need arise. IFCAs were also involved in scenario planning for patrols beyond the 12 nautical mile boundary to support the MMO's enforcement capabilities and supported with surveillance within the 12 nautical mile boundary, reporting back to the MMO to assist national monitoring of non-compliance of foreign vessels in UK waters.

Preparation for these operations included the provision of existing equipment and purchase of new equipment, review of processes and procedures, and redeployment of officers. Joint patrols were also tested through national coordination trials, with engagement taking place in part through the National Maritime Information Centre (NMIC).

IFCAs also highlighted that they contributed and advised cross-government working groups in matters surrounding the UK fishing industry, including imports and exports of local products.

Most fishers in all districts asked felt that EU Exit had not substantially impacted the way that IFCAs interact with them or operate. However, some were concerned about increased activity outside 6nm and felt this was affecting the management of inshore stocks in their district. Others suggested that it was too early to say whether there may be longer-term impacts. A minority attributed EU Exit to enforcement activities increasing in frequency and intensity and were concerned about the ability of IFCAs to operate more independently when creating fisheries byelaws.

#### **Innovation**

To support their ability to undertake this range of control and enforcement activity, IFCAs evidenced adoption and utilisation of a range of new and emerging technologies over this reporting period. The emerging use of drones was a common theme, with a range of uses identified such as feeding into survey and enforcement workstreams and working as a deterrent by providing evidence not otherwise available.

The advancement of camera technology was also highlighted, with the ability to capture underwater images and video surveys. Some IFCAs were also supporting Defra's remote electronic monitoring trials, including cameras and gear tracking technology on board scallop vessels in one example.

Aiding the health and safety of officers, as well as to enhance evidence gathering during operations, body-worn cameras were used during inspections and enforcement activities. These were increasingly utilised for a range of purposes, including working as a deterrent to reduce conflict and increase compliance. This was flagged as particularly useful for MPAs.

## Case Study 9

Cornwall IFCA: Illegal razor clam fishing

From September 2018, nineteen suspects working on board eight fishing vessels were investigated for electrofishing for razor clams and other related offences in the Cornwall IFCA district. This continued throughout 2019 and 2020 and the ongoing investigations work and preparation for court trials dominated the work of the enforcement team. The impact of the pandemic on the Courts system added significant delays but there were a number of successful prosecutions carried out in 2021 and 2022 and the rest will be heard in 2023. This concerted enforcement activity has entirely removed this illegal fishing method from the IFCA district.

## Case Study 10

Kent and Essex IFCA: Shellfish gathering joint agency "Operation Sealion"

As the UK entered its first lockdown, summer 2020 saw an upsurge in people hand gathering shellfish across the UK. While some reports were families out at the beach removing small amounts for personal use, other reports were of large groups of 10 or more people taking excessive quantities. Within the big groups there was concern that large volumes of shellfish that were not safe for consumption were being sold into the human food chain. A multiagency operation (Operation Sealion) was setup and KEIFCA officers worked closely with other agencies including patrols with local environmental health officers (EHOs) to determine whether hand-gathered shellfish was being collected for commercial sale, Gangmasters & Labour Abuse Authority (GLAA) to identify modern slavery offences and Kent Police Rural Task Force.

Intelligence was gathered and shared to support other partnering agencies specifically regarding commercial shellfish harvesting from unclassified shellfish beds and protection of designated Sites of Special Scientific Interest (SSSI). KEIFCA conducted 40 dedicated shore patrols, inspected a total of 31 groups of gatherers and issued 24 verbal warnings for various offences such as removing shellfish below minimum size and removing cockles without a license or permit. Large quantities of unsafe shellfish were seized by environmental Health Officers on public health grounds.

Building on this joint agency success officers launched of an education and prevention campaign establishing signage on the Isle of Sheppey and advertisement of regulations via social media. In partnership with Swale BC, Kent Police and Natural England, 21 signs were proposed and secured around the Isle of Sheppey coastline.

# Annex I: Levy Contributions

Table 19. Levy contributions from all local authorities within the membership of the IFCAs and associated New Burdens Funding provided by Defra to those local authorities that were assessed as incurring additional costs when the IFCAs were established in 2011.

		Defra annual New Burdens Funding	Total levy paid by local authority to IFCA budget					
IFCA	Levy-paying local authority member	support grant to  LAs that are members of IFCAs  (£'s)	18/19 (£'s)	19/20 (£'s)	20/21 (£'s)	21/22 (£'s)	Total levy available to IFCAs across reference period	
Cornwall	Cornwall Council	324,838	1,129,831	1,153,000	1,202,716	1,226,770	4,712,317	
	Bristol City Council	50,851*	41,448	40,906	41,810	41,810	165,974	
	Devon County Council	21,832	345,453	340,932	348,466	348,466	1,383,317	
Devon and Severn	Gloucestershire County Council	122,428*	106,152	104,763	107,078	107,078	425,071	
(* demotes all Defra NBF not	North Somerset Council	42,574*	33,966	33,521	34,262	34,262	136,011	
received by IFCA)	Plymouth Council	0	34,479	34,028	34,780	34,780	138,067	
	Somerset Council	133,952*	116,569	115,044	117,586	117,586	466,785	
	South Gloucestershire Council	38,110*	29,931	29,539	30,192	30,192	119,854	

		Defra annual New Burdens Funding	Total levy paid by local authority to IFCA budget					
IFCA	Levy-paying local authority member	support grant to LAs that are members of IFCAs (£'s)	18/19 (£'s)	19/20 (£'s)	20/21 (£'s)	21/22 (£'s)	Total levy available to IFCAs across reference period	
	Torbay Council	0	25,603	25,268	25,826	25,826	102,523	
	Lincolnshire County Council	127,726	459,224	508,124	522,984	531,393	2,021,725	
Eastern	Norfolk County Council	151,999	543,491	610,804	618,790	628,720	2,401,805	
	Suffolk County Council	114,420	408,293	451,643	464,816	472,271	1,797,023	
	Essex County Council	178,400	383,600	383,600	390,057	390,057	1,547,314	
	Kent County Council	137,900	383,600	383,600	390,057	390,057	1,547,314	
Kent and Essex	Medway Council	32,500	67,200	67,200	68,296	68,296	270,992	
	Southend on Sea Council	0	21,500	21,500	21,891	21,891	86,782	
	Thurrock Council	15,000	33,700	33,700	34,284	34,284	135,968	
	Brighton and Hove Council		106,766	108,901	111,100	113,300	440,067	
Sussex	East Sussex Council		406,250	414,375	422,700	431,200	1,674,525	
	West Sussex Council		450,575	459,586	468,800	478,200	1,857,161	

		Defra annual New Burdens Funding	To	Total levy paid by local authority to IFCA budget					
IFCA	Levy-paying local authority member	support grant to  LAs that are members of IFCAs  (£'s)	18/19 (£'s)	19/20 (£'s)	20/21 (£'s)	21/22 (£'s)	Total levy available to IFCAs across reference period		
Isles of Scilly	Isles of Scilly Council	109,723	123,723	126,723	126,723	126,723	503,892		
	Durham County Council	13,781	66,737	68,072	71,476	72,190	278,475		
	East Riding of Yorkshire	54,898	266,709	272,044	285,646	288,503	1,112,902		
	Hartlepool Borough Council	6,777	33,249	33,914	35,609	35,966	138,738		
	Kingston upon Hull City Council	27,449	133,354	136,022	142,823	144,251	556,450		
North Eastern	North East Lincolnshire Council	27,449	133,354	136,022	142,823	144,251	556,450		
	North Lincolnshire Council	13,781	66,737	68,072	71,476	72,190	278,475		
	North Yorkshire County Council	54,898	266,710	272,044	285,646	288,503	1,112,903		
	Redcar and Cleveland Council	6,777	33,249	33,914	35,609	35,966	138,738		
	South Tyneside Council	13,781	66,737	68,072	71,476	72,190	278,475		

		Defra annual New Burdens Funding	Total levy paid by local authority to IFCA budget					
IFCA	Levy-paying local authority member	support grant to  LAs that are  members of IFCAs  (£'s)	18/19 (£'s)	19/20 (£'s)	20/21 (£'s)	21/22 (£'s)	Total levy available to IFCAs across reference period	
	Stockton on Tees Council	68,357	66,737	68,072	71,476	72,190	278,475	
	Sunderland City Council	13,781	66,737	68,072	71,476	72,190	278,475	
Northumberland	North Tyneside Borough Council	66,733	136,469	139,198	142,678	145,017	563,362	
TVOITIGITISOTICITA	Northumberland County Council	87,907	684,147	697,832	715,278	727,004	2,824,261	
	Blackpool Borough Council	0	21,205	21,629	22,062	22,503	87,399	
	Cheshire West and Chester Council	89,131	93,817	95,693	97,607	99,559	386,675	
North Western	Cumbria County Council	0	526,144	536,666	547,400	558,348	2,168,558	
	Halton Borough Council	30,585	28,531	29,101	29,683	30,277	117,592	
	Lancashire County Council	201,857	425,901	434,419	443,108	451,970	1,755,398	
	Liverpool City Council	54,096	54,748	55,843	56,960	58,099	225,649	

		Defra annual New Burdens Funding	Total levy paid by local authority to IFCA budget						
IFCA	Levy-paying local authority member	support grant to LAs that are members of IFCAs (£'s)	18/19 (£'s)	19/20 (£'s)	20/21 (£'s)	21/22 (£'s)	Total levy available to IFCAs across reference period		
	Sefton Council	13,859	65,415	66,723	68,057	69,418	269,613		
	Wirral Borough Council	17,259	69,399	70,786	72,202	73,646	286,034		
	Dorset Council	99,785			195,667	195,667	391,334		
	Hampshire	203,644			318,921	318,921	637,842		
Southern – 20/21 and 21/22	Isle of Wight	13,663			113,280	113,280	226,520		
	Bournemouth Christchurch and Poole	12,333			87968	87968	175,936		
	Southampton	0			33,945	33,945	67,890		
	Portsmouth	0			39,628	39,628	79,256		
	Part of Dorset County Council, Poole Council and Bournemouth Council became Bournemouth Christchurch and Poole Council in 20/21.  Arrangement prior to 21/21 set out below								
Southern (18/19 and 19/20)	Dorset County Council	112,118	211,314	215,540			462,854		

		Defra annual New Burdens Funding	Total levy paid by local authority to IFCA budget				
IFCA	Levy-paying local authority member	support grant to  LAs that are members of IFCAs  (£'s)	18/19 (£'s)	19/20 (£'s)	20/21 (£'s)	21/22 (£'s)	Total levy available to IFCAs across reference period
Southern (18/19 and 19/20) cont.	Hampshire	203,644	306,537	312,668			619,205
	Isle of Wight	13,663	108,881	111,059			219,940
	Poole	0	33,689	34,363			68,052
	Bournemouth	0	27,618	28,171			55,789
	Southampton	0	32,627	33,279			65,906
	Portsmouth	0	38,089	38,851			76,940