White Paper Consultation Response.



### Q1 Do you agree with proposed powers in the fisheries bill?

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Committee's Response	We agree with all of the recommendations. We would like to see assurance that the implementation of future fishing opportunities will ensure sustainability and fair quota allocation.
	The powers that would allow the UK to amend retained EU law, subject to discussions with the devolved administrations, will remain fair and not disproportionately benefit Northern Ireland, due to the sensitive nature of their land border with the European Union.
	Regarding the powers to ensure the protection of the Marine Environment, we ask for further discussions to ensure that any future policy will best protect and reflect local needs and aspirations.
	The scheme to tender or auction future fishing opportunities must be fair and accessible to new entrants, and show preferential treatment to micro or small enterprises. We ask for considerable research into new methodologies to abolish the damaging practice of fish discards, and avoid the issue of choke species.
	We would like clear and early commitment that following Brexit the Shared Prosperity Fund will reflect the values of the current EMFF. We must have specific and targeted funding available to the industry for R&D, business and export support, health and safety and necessary infrastructure improvements.
Cabinet's Response	We agree with all of the recommendations. We would like to see assurance that the implementation of future fishing opportunities will be through a robust framework developed over time to ensure that it looks first at what can be sustainably harvested and where, and then follows with opportunities awarded to sectors /vessels that can demonstrate the least negative physical impact on the ecosystem. The detail should not be rushed by an unrealistic prescribed timetable, nor should it be delayed beyond the time needed. Fisheries regulation always has unintended consequence, most of which are predictable, in this regard, lessons must be learned. Government must be realistic about the time the process should take. We would like clear and early commitment that following Brexit there will be clear sources of grant funding that will reflect the values of the current EMFF. We must have specific and targeted funding available to the industry for R&D, business and export support, health and safety and necessary infrastructure improvements.

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

Committee's Response	The Brexit negotiations allow the UK the opportunity to implement zonal attachment, providing the industry with substantial net gains, and better equip the UK to achieve
	Maximum Sustainable Yield across all commercial species whilst minimising discard. In
	addition to this, the UK can be in a better position to manage fisheries more responsively and effectively, align investment in fisheries science with national interests and increase

	the scope of transparency in the industry.
	It is imperative that there will be the infrastructure in place to facilitate ease of access to foreign markets, and that those borders required will not become a significant barrier to trade. The fishing industry is driven by export and to continue successfully exporting post-Brexit there needs to be a quick and easy customs systems that does not allow the fresh fish to spoil and the infrastructure to support this.
Cabinet's	It is imperative that there will be the infrastructure in place to facilitate ease of access to
Response	foreign markets, and that those borders required will not become a significant barrier to trade. The fishing industry is driven by export and to continue successfully exporting post-Brexit there needs to be a quick and easy customs systems that does not allow the fresh fish to spoil and the infrastructure to support this.
	The Brexit negotiations allow the UK the opportunity to implement zonal attachment, providing the industry with net substantial gains and better equip the UK to achieve Maximum Sustainable Yield across all commercial species. In addition to this, the UK can be in a better position to manage fisheries more responsively and effectively, align investment in fisheries science with national interests and increase the scope of transparency in the industry.
	In 2018 our negotiations must ensure flexibility and assistance via additional TAC of choke species to ensure that the UK Government has the capacity to ensure UK vessels do not get caught by new landing obligation requirements that start in January 2019, leaving them tied to the quay unable to fish. Government needs to be open and transparent about the process for the distribution of additional TAC that is secured.
	Clarity is needed if in-year international swops will be able to be continued through 2019 as in previous years.

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

Committee's Response	We would like to see zonal attachment, which would allow for a fairer distribution of the nation's fishing opportunities. An estimated £17m of fish was caught by fishing vessels from France, Belgium, Germany, Ireland and the Netherlands in 2015 within 12 nautical miles of the British coast.
	In addition to this, amendments to EU legislation restricting activities in Marine Protected Areas must continue to fulfil its role of providing the conditions for Maximum Sustainable Yields. Brexit also allows for the fishing industry to modernise and abolish harmful practices such as the discards and the presence of ghost nets and fishing equipment in the marine environment. As we continue to fight plastics in the marine environment, the fishing industry, as a key stakeholder, must play a central and leading role.
Cabinet's Response	Recent events in the Baie De Seine demonstrate how tensions can flare. The UK must be prepared to defend our waters, as well as monitor and enforce our fishing regulations post-Brexit. Regulators must be adequately resourced to deploy appropriate assets. Government should not shy from the opportunity for radical reform of fisheries management. Perhaps consideration should be given to methods of quota allocation that gives meaningful bonuses or access to fishing vessels who demonstrate best practice, compliance and other measures that have mitigated their impacts on the environment more broadly.

At present Marine Protected Areas (MPAs) cover much of Plymouth's surrounding	the ring of
and are foundational to our ambitions of establishing the first National Marine Par However, Brexit poses associated opportunities and risks. As we leave we would li assurance that any amendments to EU legislation restricting activities in Marine Protected Areas (MPAs) must continue to fulfil its role of providing the conditions Maximum Sustainable Yields. Whilst on the other hand, there must be consideration mechanism that would ensure all vessels in UK waters adhere to UK regulations restricting activities in Marine Protected Areas (MPAs).	k. ke

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

We anticipate that the UK will continue to play a leading role in fulfilling Sustainable Development Goal 14 by utilising increased freedoms in fishing opportunity allocation to promote sustainability across the industry.
We see the UK increasing trade outside of Europe and with the help of central government the industry will easily expand into new markets, and best serve the Industrial Strategy's vision of a Global Britain, fit for the future.
Plymouth is a global centre of excellence for marine science and technology with one of the largest clusters of expertise in Europe. This serves the city well to become the administrative and operational hub for the nation, allowing the nation's industry the opportunity to design and deliver future strategy based upon the best scientific evidence. We are willing to pilot any new technologies in the fishing industry, such as autonomous fishing technology.
The UK must seize the opportunity to lead in the international negotiations for the development of a 'High Seas' strategy through the G7 and UN. The UK is best placed to lead this strategy without the conflict of having a high seas fishing fleet, unlike so many countries. We must also lead in fisheries and ecosystems science to support High Seas and UKOT work by utilising the best available in specific fields of marine science.
Plymouth, with its world-class marine academic institutions and specialist global expertise should play an important role in this.
Plymouth is a global centre of excellence in marine science and technology with one of the largest clusters of expertise in Europe. This serves the city well to become the administrative and operational hub for the nation, allowing the nation's industry the opportunity to design and deliver future strategy based upon the best scientific evidence. We are willing to work collaboratively with Government and our academic partners to pilot any new technologies in the fishing industry, such as autonomous fishing technology.

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

Committee's Response	We believe that those policy areas where a common legislative approach is necessary would involve access to markets, to ensure fair future trading. In addition to the potential incentives or penalties that will be aimed at abolishing discards. Finally, we would like to see that access to funding or business support will have a common and transparent framework that ensures that business support will target those who need it most.
Cabinet's Response	The UK Government must continue to lead on fisheries policy for the UK, whilst Devolved administrations should continue to administer for their fleets and opportunities. At present however, the English fishing fleet is represented by the UK Minister of State for Agriculture, Fisheries and Food, who also represents the UK as a whole. This scenario has led to insufficient representation of the English fleet which must need addressing.
	Plymouth can lend its expertise and diverse fleet that include a mixed fishery, most classes and sizes of vessel, and most methods of capture, to act as a catalyst to ensure that the English fleet receives its deserved representation.

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

Committee's	No.
Response	
Cabinet's	It is imperative that there will be the infrastructure in place to facilitate ease of access to
Response	foreign markets, and that those borders required will not become a significant barrier to trade. The fishing industry is driven by export and to continue successfully exporting post-Brexit there needs to be a quick and easy customs systems that does not allow the fresh fish to spoil and the infrastructure to support this.

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

Committee's Response	There needs to be assurance that the short term costs derived from reduction in catch of certain species, in the pursuit of achieving Maximum Sustainable Yield across species is mitigated. These costs must not unfairly impact on the micro and small fishing enterprises and any reduction in fishing opportunities must be grounded in extensive scientific research and consult widely with the fishing industry.
	In addition to scientific research into the state of the fisheries stocks, we would also like to see further investigation into the other harmful fishing practices such as ghost fishing equipment. There needs to be a wider discourse between academics and the industry to ensure a modernised UK fishing fleet that is fit for purpose and best promotes our sustainable ambitions. We believe that there are significant technological opportunities in new methods of

	policing and enforcement. REM and CCTV technology can allow for more targeted enforcement and with a cluster of marine science expertise, and the largest Naval Base in Western Europe, Plymouth would be well placed to offer itself as the centre for any new policing efforts.
Cabinet's Response	The UK must continue the upward trajectory of recovering fish stocks. While healthy stocks must be a goal, appropriate consideration needs to be given to the impact to micro and small businesses. There must be meaningful impact assessments given to measures that may increase risks to fisherman's lives due to changes in fishing patterns.
	We also believe that there are significant technological opportunities in new methods of policing and enforcement. REM and CCTV technology can allow for more targeted enforcement and with a cluster of marine science expertise, and the largest Naval Base in Western Europe, Plymouth would be well placed to offer itself as the centre for any new policing efforts.

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

Committee's Response	In addition to being out of date, the current system promotes unfair distribution of fishing opportunities. Small coastal boats under 10m which make up 77% of the English fleet currently have the right to catch 3% of the total English catch of quota controlled fish such as cod, haddock, plaice, sole, herring and mackerel <sup>1</sup> . Fishing is a vital industry to small coastal communities, which have already been identified as some of the most deprived areas in the UK, the economic gap between coastal and non-coastal communities has widened over time, and current approaches to fishing opportunity allocations further disadvantage those communities that rely on the industry. <sup>2</sup> We ask government to consider a modernised and evidence based approach to quota allocation to ensure those communities are adequately represented in current and additional fishing opportunities.
Cabinet's Response	In addition to being out of date, the current system promotes unfair distribution of fishing opportunities. Small coastal boats under 10m which make up 77% of the English fleet currently have the right to catch 3% of the total English catch of quota controlled fish such as cod, haddock, plaice, sole, herring and mackerel <sup>3</sup> . Fishing is a vital industry to small coastal communities, which have already been identified as some of the most deprived areas in the UK, the economic gap between coastal and non-coastal communities has widened over time, and current approaches to fishing opportunity allocations further disadvantage those communities that rely on the industry. <sup>4</sup> We ask government to consider a modernised and evidence based approach to quota allocation to ensure those communities are adequately represented in current and additional fishing opportunities. As is always the case with any policy changes there will be unintended consequences, we hope to see that any potential changes to the existing quota allocation, and additional quota allocation be fair. There must be adequate piloting of any new systems of allocation, and for this, Plymouth is enthusiastic about piloting any

<sup>1</sup> Brexit is a red herring when it comes to the plight of UK Fishermen. The Guardian. 11<sup>th</sup> June 2018.
<sup>2</sup> Britain's coastal communities amongst worst performing areas for earnings, jobs, health and education. Social Market Foundation. September 4 2017.

new schemes.

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

Committee's	In addition to a modern and science based approach to quota allocation, any future
Response	auction or tender process must address the current inequalities in the distribution of
	fishing opportunities. We ask for a system that allows new entrants and micro/small
	enterprises to easily access the sector's additional opportunities.
	We seek greater clarity on the proposed system to ensure the needs of local fishermen
	are fairly met.
Cabinet's	Please refer to question 8.
Response	

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

Committee's Response	We welcome any research into the industry and believe that the proposed 'days at sea' approach could be an interesting measure. As previously stated, Plymouth is enthusiastic about piloting any new systems or frameworks to help modernise such a key sector. With the sheer range of boats and fisheries that Plymouth has to offer, Plymouth would be the ideal destination to trial a new effort system. We would be interested in seeing the evidence base that led to these suggestions. We anticipate that any future research of trial of this nature would include a comprehensive discussion with the industry to ensure that there is consensus on what success might actually look like.
Cabinet's Response	Plymouth is enthusiastic about piloting any new systems or frameworks to help develop robust and equitable management systems. Britain's Ocean City is uniquely based to help pilot such trials with a diverse fleet that include most classes and sizes of vessel and most methods of capture. Plymouth is also home to world class institutions such as Plymouth Marine Laboratories, Marine Biological Association, Plymouth University and many more. We anticipate that any future research of trial of this nature would include a comprehensive discussion with the industry to ensure that there is consensus on what success might actually look like.
Luke Pollard MP for Plymouth Sutton and Devonport	Plymouth is well positioned to assist the Government in piloting new systems and frameworks, enforcement mechanisms and approaches. We recognise that not all trials will be positive but experience of piloting changes will help inform Ministerial decisions and deliver better fishing policies. We believe that our geographical position, expertise and market position makes Plymouth a natural test bed providing that guarantees, appropriate compensations and proper partnership agreements can be put in place. Britain's Ocean City is uniquely based to help pilot such trials with a diverse fleet that include most classes and sizes of vessel and most methods of capture. Plymouth is also

home to world class institutions such as Plymouth Marine Laboratories, Marine Biological Association, Plymouth University and many more.

We anticipate that any future research of trial of this nature would include a comprehensive discussion with the industry to ensure that there is consensus on what success might actually look like.

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

Committee's Response	We would welcome any additional research into alternative management systems, however, any considerations must take into account the wider implications. Plymouth is the administration port with the largest number of fishermen in the UK
	(1,000) whose most valuable catch is shellfish <sup>5</sup> . Therefore, any minor adjustments to the management system, without due diligence, could have potentially huge economic impacts, concentrated in ports such as Plymouth.
Cabinet's	Many shellfisheries have developed historically through displacement from other sectors.
Response	It is essential that all stock management is considered holistically, and not in isolation, if mistakes of the past are not to be repeated. Plymouth is uniquely placed to consider
	robustly the unintended consequences of good intentions as our diverse fleet has most
	classes of vessel, most methods of catch offer a 'snap shot' of the English fleet more broadly.
	Plymouth is enthusiastic about piloting any new management systems.
	Plymouth is the administration port with the largest number of fishermen in the UK
	(1,000) whose most valuable catch is shellfish <sup>6</sup> . Therefore, any minor adjustments to the management system, without due diligence, could have potentially huge economic impacts, concentrated in ports such as Plymouth.

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

"Sea Angling 2012, the study of Recreational Sea Angling" (by CEFAS for Defra) found that there are 884,000 sea anglers in England who directly pump £1.23 billion pa into the economy and a further £0.8 billion indirectly.

Plymouth is one of the country's most important centres for recreational sea angling due to its geographical location with easy access to high quality marine environment.

These activities place pressure on the fish stocks and the marine environment in general. However, fisheries management has previously focused on commercial fishing, with these activities going unmanaged.

<sup>&</sup>lt;sup>5</sup> MMO Annual Report. 2017

<sup>&</sup>lt;sup>6</sup> MMO Annual Report. 2017

Plymouth City Council would therefore like to see the same rigorous approach put on recreational fishing as currently exists for commercial fishing, in order to ensure that the resource is better managed, thereby delivering sustained economic, social and environmental benefits.

PCC considers that local management is the key to sustainable management provided that adequate resources are provided. PCC also consider that sustainable management of the waters should go hand in hand with the adjacent land and an ecosystem approach should be taken for the waters of Plymouth's adjacent waters.

PCC considers that this could be provided through the establishment of an integrated National Marine Park, governed and managed locally with delegated decision-making and cross-warranting, allowing a holistic approach to management of marine activities carried out locally.

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

The Government needs to set out in more detail how discards and by-catch will be avoided and managed in order to secure the vision of a sustainable fishery supporting a sustainable environment. A robust and rigorous approach is needed, based on the ecosystem approach to manage the activity in a more holistic way.

# Q14: Do you agree with the proposed approach to protecting our marine environment in relation to fisheries including the powers proposed in the Fisheries Bill (see section 1.2)?

The protection of the marine environment depends on a new Independent body to hold government to account on environmental standards after we have left the EU. PCC considers that under the current proposals, this will not be the rigorous independent body that is needed, and without such a body then the marine environment will not be protected.

PCC believes that local communities are best placed to protect what they hold dear to them and would like to see delegated decision making based on local knowledge and strong evidence. PCC believes that one way to achieve this is to create local National Marine Parks where a more holistic integrated approach is taken to marine management. PCC is well placed to take this forward, as it has successfully managed the waters of Plymouth Sound and the Tamar Estuaries through such an approach, and can offer extending this to a wider stretch of water which could form Britain's first National Marine Park.

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

Effective management of fishery stocks relies on sound scientific evidence. Members of the fishing industry should have a role in providing this evidence and already do so, hosting fishery scientists and providing data through their activities.

Luke Pollard MP for Plymouth Sutton and	Effective management of fishery stocks relies on sound scientific evidence. Members of the fishing industry should have a role in providing this evidence and already do so, hosting fishery scientists and providing data through their activities.
Devonport	There is strong evidence to show that when local fishing industry are more directly involved in the management of the resource, then the outcomes are positive for both the industry and the environment. However, there is also evidence so show that this only happens when the partnership to manage the resource is properly resourced and constituted and that this needs to be done at a local level with subsidiarity for fishery management[2].
	Plymouth City Council believes that there needs to be more transparency regarding the evidence and more resources are needed to ensure that decision making is being made

on best available evidence.

There needs to be a clearer and more honest dialogue between the fishermen and the management body. The IFCAs work well for the inshore waters and these could be extended to offshore to enable this collective management approach to be extended to offshore waters.

However, the sea is not just a location for fisheries, but also a place where many other activities take place, and these need to be managed holistically. PCC believes that the most effective way to do this, particularly in busy waters close to port, cities and recreational areas, is through a new holistic approach to the management of marine areas. PCC believes that this is best achieved through a UK blue belt policy and in respect of the waters around our city, via the creation of the UK's National Marine Park. We recommend that the Government commits to supporting the National Marine Park for Plymouth to ensure a sustainable fishing plan.

There is strong evidence to show that when local fishing industry are more directly involved in the management of the resource, then the outcomes are positive for both the industry and the environment. However, there is also evidence so show that this only happens when the partnership to manage the resource is properly resourced and constituted and that this needs to be done at a local level with subsidiarity for fishery management<sup>7</sup>.

Plymouth City Council believes that there needs to be more transparency regarding the evidence and more resources are needed to ensure that decision making is being made on best available evidence.

There needs to be a clearer and more honest dialogue between the fishermen and the management body. The IFCAs work well for the inshore waters and these could be extended to offshore to enable this collective management approach to be extended to offshore waters.

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

No.

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

The fishing industry is concentrated in small coastal communities which are disproportionately reliant on fishing and other seasonal industries making them highly vulnerable to shocks. Brexit will provide an opportunity to access increased fishing opportunities, with net economic gain. However, if the transition is mismanaged, and there is no viable funding stream to replace the current EMFF, then these communities will suffer.

Plymouth would seek to secure capital funding to improve the infrastructure of its fishing industry to maximise efficiency and minimise any delay in the landing, handling, sale and dispatch of the fish and fish products. This issue should be viewed holistically and take into account city-wide infrastructure that may act as a barrier to

<sup>&</sup>lt;sup>7</sup> https://www.iucn.org/theme/protected-areas/publications/best-practice-guidelines

growth. This should also include capital funding to ensure that post-Brexit, border control shall not be a barrier or obstacle to fish markets efficiently reaching international markets.

With immense technological advancements in fishing science and monitoring we would like to see increased funding to train our fishermen in these practices and also to attract a new generation of fishermen to a sector that is often unfairly portrayed in the media. By raising the profile of what is misguidedly seen as a low-skill, low-wage sector the industry can hope to attract and retain the talent it needs. Training needs to be made more readily available to the sector, and the specific needs of fishermen (particularly their unusual working hours) need to be carefully considered when rolling out any training schemes.

We would seek support to appoint specialists in the fishing sector to promote Plymouth as an area to pilot initiatives working with DEFRA. This would include new support for regulatory structures as well as new technology and preparing the fishing community to take advantage of new technology.

Further funding and examples of best practice should be made readily available, through training and equipment, to the industry to combat the key issues of health and safety. In the past 10 years, 94 fishermen have died at sea whilst 529 have suffered serious injury making fishing the most dangerous peacetime occupation. We would welcome innovative funding to best identify methods of keeping fishermen safe.

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

No.