

Submitted to Remote electronic monitoring

Submitted on 2023-10-03 12:08:20

Personal details and confidentiality

A Would you like your response to be confidential?

No

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

B What is your name?

Name:

Matthew Mander

C What is your email address?

Email:

m.mander@devonandsevernifca.gov.uk

D What is your organisation?

Organisation:

Devon and Severn IFCA

E Which of the following best describes your interest in remote electronic monitoring

Other

If 'Other', please specify:

D&S IFCA has statutory duties under Ss.153 and 154 MaCAA 2009:

153 Management of inshore fisheries

(1) The authority for an IFC district must manage the exploitation of sea fisheries resources in that district.

(2) In performing its duty under subsection (1), the authority for an IFC district must—

(a) seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way,

(b) 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,

(c) take any other steps which in the authority's opinion are necessary or expedient for the purpose of making a contribution to the achievement of

sustainable development, and

(d) seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district.

154 Protection of marine conservation zones

(1) The authority for an IFC district must seek to ensure that the conservation objectives of any MCZ in the district are furthered.

IFCAs manage the inshore fisheries and marine environment that may be impacted by them. D&S IFCA also in order to exercise its powers under SS 155

and 156 MaCAA to make byelaws and monitor compliance and undertake enforcement of these byelaws. D&S IFCA is also a relevant and appropriate

Authority in other legislation such as Habitats Regulations, Fisheries Act; Environment Act, Wildlife and Countryside Act (as amended), Marine strategy

Regulations. Of particular relevance to the FMPs are the Fisheries Act and the Joint Fisheries Statement where IFCAs must have regard to the objectives set out in the Act.

F Where are you based?

England

Introduction

Consultation information

What we are proposing to do

1 What do you think about our vision for remote electronic monitoring?

Please explain:

D&S IFCA fully supports the approach to maximise the benefits of REM technologies. The adoption of REM across the main English fisheries is necessary if

the Country has any meaningful prospect of having world class fisheries. The front runner FMPs have all highlighted that lack of evidence and fisheries

related data is the greatest challenge to introducing effective fisheries and conservation management. REM provides the opportunity to gather much

better, high quality data. This will inform how current fisheries are actually operating at the moment and allow, through a co-management approach, to

introduce better management. A real challenge and concern from the fishing sectors is whether legislation can be flexible enough to change at the same

rate that our knowledge of the fisheries grow through the use of REM. This consultation is to be considered in conjunction with the discarding reform and

it is clear that REM would have identified that the Landing Obligation had not worked much sooner. D&S IFCA is currently assessing the use of REM

technologies with the focus to provide meaningful protection to MPAs in its District. Although the focus is on evidence gathering to better inform

management decisions, it is clear that without the ability to effectively monitor fishing activity, compliance with management is not guaranteed and

significantly undermines the regulatory framework. The use of REM can lead to positive changes for the fishing sector such as those identified in this

consultation. D&S IFCA is already providing some additional benefit to the fishers participating in its REM Project. The REM projects that are being

considered are quite complex and that leads to much higher costs being incurred with can be a barrier to implementation. Similar to Marine Scotland,

D&S IFCA believes that significant benefits and value for money can be derived from relatively simple applications of REM. Marine Scotland has

introduced mandatory requirements for REM on its scallop dredging vessels. D&S IFCA's REM project has identified that it can achieve a fully automated,

fully monitored (in respect of fishing in MPAs), fully supported (airtime, data management, warranty of equipment) for its scallop dredge fishery of 54

vessels currently for £36,000 per year.

What remote electronic monitoring can achieve

Our proposed approach

2 Do you agree with the proposals as listed below:

Do you agree - Taking a targeted approach beginning with specific priority fisheries:

Agree

Do you agree - Not including vessels under-10m at this stage:

Neither

Do you agree - Working together with the fishing industry, and setting up steering groups to design REM programmes:

Agree

Do you agree - Beginning with voluntary early adopters within priority fisheries moving to mandatory requirements in time:

Agree

Please explain further:

D&S IFCA's REM project has been based on vessel owners' voluntary participation to inform how the technologies can be used. D&S IFCA has provided,

through exemptions to its Byelaw requirements, some immediate benefits to vessel owners in the project.

D&S IFCA agrees with piloting the technology in different fisheries but should include examples of where relatively simple REM solutions can be

introduced. This brings forward the potential timeframe to introduce REM technologies and brings some immediate benefits. National project looking to

protect the MPA network from demersal towed gear boats should be a priority. Dependent on the fishery, it may be important to include the under 10m

fleet. One of the barriers to including the under 10m fleet is not necessarily the limitation of the technology but is the cost to the vessel owner in

maintaining the equipment. D&S IFCA is considering whether it can subsidise the costs of the REM systems post installation. Fishing sector already

receives direct subsidies such as fuel rebate and benefits from significant Government funding support, a proportion of which could be redirected to REM

support. Really important to include fishers in the process so that the development process is seen to be open and transparent.

3 For each priority fishery, do you agree with the definition in Table 2? If not, what would you change (gear type/location/vessel size)?

Do you agree - Fishery A:

Agree

Do you agree - Fishery B:

Agree

Do you agree - Fishery C:

Agree

Do you agree - Fishery D:

Agree

Do you agree - Fishery E:

Agree

What would you change (gear type/location/vessel size)?:

C and E proposals seem very similar and it may be better to replace one of these fisheries with answer to Q4 below to focus on other ways that REM can

improve our approach to fisheries management.

4 Do you think any other fishery should be prioritised?

Yes

If no, please explain which fishery or fisheries should be prioritised:

As discussed before, MPA protection from scallop dredge fleet. It would also be good to have an example of a potting fishery included. Netting fishery is

included but the Crab and Lobster FMP identifies that pot limitations could be an important management measure but it needs REM systems to make this key management measure viable.

5 What are your views on the proposed timeline and order of implementation?

Please explain:

D&S IFCA would prioritise Fishery B. Although the fishery mainly occurs in the eastern part of the English Channel, D&S IFCA is aware that there is

significant concern within the fishing sector and regulators over the impact of this fishery. There are indications that this has already caused the

displacement of fishing effort to the west including in D&S IFCA's District. REM technology is available now that could significantly improve the

understanding of the impact of this fishery. The concern regarding this fishery have been around for many years already and to suggest that the most

proactive steps we can take is to encourage vessel owners to voluntarily adopt REM in a further two years lacks ambition. The Channel NQS FMP has also

identified the need to introduce management for flyseining and it would be a very positive step and demonstration of the value of this new approach to

fisheries management if a mandatory REM solution was introduced in this fishery as soon as possible

6 Do you have any additional views on the proposed priority fisheries?

Please explain:

No

7 What are your views on the important data objectives in Table 2 in each priority fishery?

Please explain:

The data objectives seem appropriate.

8 Are there any additional data objectives that you think should be included in table 2 for each priority fishery?

Yes

Fishery A:

Fishery B:

Monitoring of the fishing activity in relation to MPAs would be easy to achieve

Fishery C:

Monitoring of the fishing activity in relation to MPAs would be easy to achieve

Fishery D:

Fishery E:

Monitoring of the fishing activity in relation to MPAs would be easy to achieve

Implementation considerations

9 Do you have any views around how different aspects of remote electronic monitoring should be funded?

Yes

Hardware and installation:

Similar to the current and previous introductions of IVMS and VMS, this should be funded by Government

Maintenance costs:

D&S IFCA believes that Government support through additional funding should be made available as it can be demonstrated that the value of the

improved data gathering and changed approach to management is actually more cost effective and provides better value for money to the public purse.

For example, REM is likely to be much more effective at monitoring fishing activity than can be achieved using patrol vessels and aircraft, so that the cost

of providing fishery patrols can be redirected to supporting the introduction and use of REM. If REM is introduced correctly it is likely that the fishing

sector will derive some key financial benefits that can be considered over time. However in the short-term there is an argument for Government to

support the use of REM in the key fisheries.

Data costs including transfer, analysis and storage:

As above. Cost to the fishing sector is likely to be one of the three main barriers to REM along with privacy concerns and the rate at which management

changes.

10 Is there anything else you would like to comment on regarding implementation or generally on our plans to expand the use of remote

electronic monitoring in English waters, as set out in this consultation?

Please explain:

It is really positive that there is a consultation on the proposed introduction of REM. There has been considerable advances in the technologies adopted

by the fishing sector to improve its catching capability but the use of technology to monitor the fishing activity has been much slower. To think that

nationally, the key mandatory requirements are for 12 metre and above vessels to report their position every two hours and to use e-log books to report

the catches shows how much opportunity there is for Regulators and fishers to benefit from the much wider use of technologies. The list of REM projects

already undertaken shows that the technology works and has been trialled for over a decade so implementation could be achieved sooner.

The timeframes for the proposed REM projects should be brought forward. The introduction of the first REM fisheries is not proposed until 2028 at the

earliest. As discussed above, introducing REM in the flyseining fishery should be prioritised and mandatory measures introduced as soon as possible.

Confidentiality and data protection

Glossary

Annex A: Defra group remote electronic monitoring projects and trials to date

Annex B: Fisheries prioritisation evidence review

Annex C: Priority fishery charts

Consultee feedback on the online survey

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

Very satisfied

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

Much better to provide the summary points to introduce the set of questions. Much more straight forward than the volume of documentation provided

for the FMPs and arguably a more important consultation as without REM, the FMPs won't be able to transform fisheries management in the way that is

needed