

Defra consultation on the Introduction of Inshore Vessel Monitoring Systems for all



licensed British fishing boats under 12 metres in length operating in English waters

Written evidence submitted by Sustain: the Alliance for Better Food and Farming

About Sustain:

Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Amongst our influential projects and campaigns are:

- **Sustainable Fish Cities:** A campaign to encourage and support fish-serving businesses in the UK to adopt and promote a sustainable fish buying policy. So far, business serving nearly one billion meals per year have pledged to serve only fish which is considered verifiably sustainable; either certified to a recognised sustainability standard, or rated 1-3 by the Marine Conservation Society.
- **Children's Food Campaign:** which notably helped push for a sugary drinks tax, junk free checkouts in supermarkets, improving the standard of food being served in schools, and for food education being put back on the curriculum and the introduction (and continuation) of universal infant free school meals.
- **Good Food for London:** Our annual report in its sixth year compares local authority commitments to good food measures, including improvements to food culture in schools and ranks them in a league table.
- **Food Power:** working to alleviate food poverty by calling on Governments across the four nations to tackle the root causes such as low pay, as well as to improve and protect publicly-funded nutrition programmes. We are launching a related programme to support local food poverty alliances across the UK including in London.

This submission does not represent the detailed views of all of Sustain's member organisations, some of whom we understand have put in their own submissions.

Consultee Information:

1. **What is your name?** Ruth Westcott
2. **What is your email address?** ruth@sustainweb.org
3. **What category best describes your interest in this consultation?** Non-Government Organisation
4. **If applicable what is the name of your organisation?** Sustain: the Alliance for Better Food and Farming
5. **What is your role in the organisation?** Sustainable Fish Cities Co-ordinator
6. **Would you like your response to be confidential?** No

Consultation questions:

Background to the Sustainable Fish Cities Campaign, and why this is relevant to this consultation

The Sustainable Fish Cities campaign works with businesses to adopt a fully sustainable fish buying policy, according to the following criteria (for wild-caught fish):

- **Avoid the worst:** Removing endangered species from menus and catering – defined as those rated 5 ('fish to avoid') by the Marine Conservation Society: www.fishonline.org/fish-advice/avoid
- **Promote the best:** Serving sustainably managed fish – defined as MSC-certified fish, and those rated 1-2 ('fish to eat') by the Marine Conservation Society: www.fishonline.org/fish-advice
- **Improve the rest:** Over time, improving the sources of fish rated 3-4 ('OK to eat occasionally') by the Marine Conservation Society.

To date, businesses serving well over 0.8 billion meals per year have committed to buying fish according to these standards (see: https://www.sustainweb.org/sustainablefishcity/whos_working_on_it/), including:

- All central government procurement, Whitehall, prisons and defence catering, and the NHS in England and Wales.
- Eight of the ten largest contract catering companies in the UK for thousands of workplaces, stadia, schools and conference and leisure venues
- Brakes - the largest foodservice wholesaler with roughly 20% market share have switched all their own-brand fish products to demonstrably sustainable options.
- 30+ UK Universities, covering about 25% of all the students in UK

7. Do you agree with the proposal that I-VMS is needed on under 12m vessels?

Yes, we fully support the proposal to implement I-VMS on under 12m vessels, to help to generate the vital data required for effective management of UK fisheries. Crucially, I-VMS will help to ensure that genuinely sustainable fishing is recognised, rewarded and incentivised. As we will explain in more detail below, at present some UK fisheries – smaller fleets in particular - are missing out on being able to market their fish as sustainable because they lack the data to prove sustainability. This is both unfair on the smaller-scale fleet, and a missed opportunity to secure economic sustainability for our coastal communities. Sustainable Fish Cities is part of the trend that is seeing [the market for sustainable fish growing ten times faster than for conventional fish](#). The campaign aims to reward fisheries that are verifiably sustainable, and help to ensure that sustainable fisheries get the best access to markets, but at the same time 'block' fish which is unsustainable from the menus of some of the largest companies in the UK.

This is having an impact on the demand for sustainable fish in the UK. In a recent report, Sustainable Fish Cities found that [UK fisheries are losing out on millions of pounds of business](#) from the catering sector, as UK buyers

choose scallops, plaice, some cod, seabass and halibut from abroad because the local catch doesn't meet sustainability standards. Increasing demand for sustainable fish is the trend in the UK and internationally, which is very important for the UK as [roughly 75% of the fish we catch is exported](#). The proposal to have I-VMS on under 12m vessels will help to fill the data gaps to allow UK fisheries to better access these markets. Below we provide more detail on how I-VMS could effectively fill some of the gaps in data for key measures of sustainability of stocks.

The Marine Conservation Society's 'Good Fish Guide' rating scheme

The Good Fish Guide is the most widely used and respected seafood sustainability rating scheme in the UK, and one of the schemes upon which the Sustainable Fish Cities pledge is based. It is science-led and consultative, and the [rating methodology is publically-available](#). It rates fish on a scale of 1-5 (1 being considered 'best choice', 5 being 'fish to avoid'). The scheme determines whether a fishery is sustainable based on the target stock health, impact of fishing on the marine environment, and the effectiveness of management. Where this data isn't available, a precautionary approach is used when determining a rating, which must essentially assume the worst to ensure unsustainable fish isn't inadvertently promoted.

At present, a worrying amount of the UK's catch is rated 4-5. In Table 1, we illustrate how big a factor data deficiency is in these species having a low rating for certain areas or catch methods.

Table 1 – Summary of data deficiency issues for the 11 most commercially-important fish species caught by UK boats

Species and landings value in 2016	Any areas rated 'Fish to Avoid'?	Sustainability challenges related to data deficiency
Mackerel £188 million		None – info is generally good
Nephrops £104 million	YES - parts of North Sea	Stock status in some areas is unknown. Not all boats are monitored and catches recorded
Scallops £75 million	YES – from Isle of Man	No reference points in some areas, stocks in the channel are poorly understood.
Monkfish or Anglerfish £60 million		Some deficiency for South West Monkfish stocks, others better understood
Herring £56 million	YES – West of Scotland and West of Ireland	None – info is generally good
Cod £53 million	YES – some stocks, in Celtic Sea, Norwegian Coast	Generally well understood but significantly more data needed in Baltic and Faroes
Crabs £53 million		Velvet crabs and spider crabs poorly understood throughout the UK
Haddock		Info is generally good

£45 million		
Lobsters £40 million		Data deficiency for at least half stocks
Hake £33 million		None – info is generally good
Plaice £28 million	YES – West and SW Ireland, and pulse-trawled fish in North Sea	Data deficiency in Ireland, Bristol Channel, and Baltic Sea

Marine Stewardship Council (MSC) certification

The MSC is an international, independent certification scheme which awards a blue ecolabel to fisheries that have been voluntarily assessed and determined to be sustainable. It is one of the assurance schemes that Sustainable Fish City signatory businesses can use to prove the fish they buy is sustainable. To pass the MSC assessment, the fishery must have sufficient data to prove that the stock is in a healthy state and that fishing is being conducted in accordance with relevant laws and conservation measures (including respecting marine protected areas, closed areas, and the discard ban). The assessment also considers data on bycatch levels, discarding, and catches normally need to be fully recorded.

In 2012, Seafish – in partnership with the Marine Stewardship Council – carried out an MSC pre-assessment on all inshore fisheries in England, to assess how likely it would be for the inshore fleet to pass an MSC assessment. [The project](#) identified that only 12% of the stocks targeted by the inshore fleet in England had the data necessary to progress to a full MSC assessment, with the rest determined ineligible. (Of 156 stocks identified, 71 did not have a stock assessment at all, and the rest had a partial assessment or some information missing, such that it was not possible to determine the reference points necessary for sustainable management - data correct as at 2013). By comparison, for the key UK stocks targeted by larger industrial boats, [one fifth do not have a stock assessment](#) – still a large number but significantly lower than for the stocks targeted by the small scale fleet.

We therefore believe that I-VMS is a crucial step towards the under 12-metre boats tackling the data deficiency that is holding them back from achieving MSC certification, but also ensuring the smaller fleet have the same opportunities as larger boats to market themselves as sustainable, and benefit from a greater diversity of markets to sell to.

Supporting sustainability

By recording the location and extent of fishing activity, I-VMS will give vital information about fishing behaviour and inform management. However, it isn't enough on its own to solve the data deficiency issue and allow fisheries to be recognised as fishing sustainably as per the standards above. If I-VMS were implemented alongside a number of other initiatives it would be much more successful, allowing government to fulfil its

promises of delivering a green Brexit and '[setting a gold standard for sustainable fishing around the world](#)', and delivering these together would likely save time and cost:

- CCTV on board all fishing boats as part of ensuring the smooth implementation of the discard ban.
- Ensuring all UK boats have fully recorded catches, to improve the understanding of what fish is caught and where.

Data collected and how it is analysed:

To ensure this proposal achieves its aims, it is vital that data is gathered in fine enough detail. (I.e. the system sends 'pings' frequently enough to detect infringements). Defra must therefore commit to respecting scientific advice on this issue.

It is reassuring to see that data submitted by I-VMS will be *recorded*, but it is also vital to create the framework for *analysing and responding to the data collected*, as well as a firm commitment to act on the results, otherwise these efforts will be in vain. We would like to encourage Defra to consider the following:

- There have been worrying compliance issues for fishing laws in the past, including for [vessel monitoring systems](#) and [fishing illegally in protected areas](#). We believe that the best approach is to incentivise compliance by allocating a proportion of fishing quota according to transparent social and ecological criteria, and this proportion could increase over time to allow for adaptation.
- Invest in technology to analyse results and flag issues in real-time, with a warning system for non-compliance, for example artificial intelligence which can automatically detect when I-VMS systems are switched off or damaged, or fishing in protected areas, which could be automatically sent out to boats as a warning, or automatically alert patrol vessels, as [happens in Australia](#) at the moment.

Costs

We welcome the proposal that the project will be initially funded by the European Fisheries and Management fund (EMFF) to help alleviate the financial burden on fleets.

8. What alternative approaches could be taken to achieve the same aim?

We support the implementation of I-VMS as per this consultation proposal and don't see any viable alternative approach. We believe, however, that the benefits of I-VMS will only be realised if accompanied by other measures, including fully documented fisheries, CCTV cameras on board, and a requirement to transmit data (ie send 'pings') regularly.

9. What are your views on the costs and benefits as set out in the Regulatory Triage Assessment, do you agree with them?

Yes, we broadly agree with the Triage Assessment, with a number of points to raise:

- I-VMS alone won't solve the data deficiency issue, and won't automatically mean that fisheries are considered sustainable – so it is important not to over-state this as a fix for the sustainability issues in UK fishing. For this to be the case we must also:
 - o Require all fisheries to be fully documented
 - o Go further than just IVMS to also include CCTV on all boats
 - o Ensure a system of analysing and responding to the data collected, through responsive management
 - o Ensure a system of rewarding compliance, as well as penalising infringement
- The assessment states that no additional cost to the government is anticipated, and that Inshore Fisheries Conservation Authorities (IFCAs) will conduct day-to-day monitoring. We are concerned that this will place extra workload on IFCAs without additional resource and urge government to ensure that the IFCAs are sufficiently resourced, drawing on the funding set to replace the EMFF, whether via the 'UK Shared Prosperity Fund' or a standalone purpose built funding stream, to effectively monitor and react to data collected, otherwise these efforts will be in vain.

10. Are there any costs or benefits that have not been identified in the Regulatory Triage Assessment? What evidence do you have to support this?

No quantitative analysis of the benefits of tackling data deficiency were presented, but we would like to stress our evidence that UK fisheries are missing out on markets because they can't prove that they are verifiably sustainable at present. We estimate that, for contract catering alone (which is roughly a quarter of the foodservice sector), UK boats could sell [£62 million more fish if they were verifiably sustainable](#).

11. Are there any further comments you would like to make on the impact of the proposal?

We would like to make two comments specifically in relation to the UK's forthcoming exit from the EU:

1. All the requirements surrounding I-VMS must be applied to boats that are granted access to UK waters after Brexit. This includes the requirements to report, react to sanctions, use CCTV etc. Failing to do this would undermine the aims of this proposal.
2. One major benefit of I-VMS is to provide consumers with accurate information of catch locations which may improve consumer confidence when purchasing local fish. This is an excellent and worthy ambition. However this proposal won't, on its own, mean that this information is available to consumers. To do this Defra should re-affirm and strengthen the EU legislation that requires fish to be labelled with the name of the species and its catch location, and extend this legislation to cover processed fish.