



**reaf**

**Renaissance of the  
East Anglian Fisheries**

**Recommendations 2021**





We are a community led group that is seeking to regenerate and revitalise the local fishing industry for the benefit of coastal communities and the people of East Anglia. The group is made up of representatives of the regional fishing industry, East Suffolk District Council, Suffolk County Council, Norfolk County Council, New Anglia Local Enterprise Partnership, and Seafish.

We prepared a long term strategy in the lead up to Brexit. Now that there is the Agreement in place between the UK and the EU we have reviewed and, where appropriate, revised our recommendations. Many of our earlier recommendations continue to stand, but others have been updated to reflect the terms of the UK's new relationship with the EU and departure from the Common Fisheries Policy.

**Our goal is constant: a sustainable and profitable future for the East Anglian fishing industry.**



# Recommendations

## 1. Improving fishing opportunities

We recommend:

- 1.1 That the fisheries management and quota allocation system in England should be fundamentally overhauled to produce a fair distribution of fishing opportunities, with a view to protecting and strengthening the economies of coastal communities.
- 1.2 That there should be a regional effort based hours at sea trial project in East Anglia. This should run in parallel with community quota trial schemes elsewhere in England.
- 1.3 That pending this, the management of the under 10m vessel Pool system of allocating fishing opportunities should be improved so that it enables inshore fishers to operate flexibly in harmony with the seasonal nature of fisheries and the economics of the industry.
- 1.4 That limited finfish fishing opportunities should be reinstated for shellfish licence holders, to provide greater flexibility.
- 1.5 That the regulations governing fishing for bass in the southern North Sea should be reviewed and modified with the aim of putting in place a long term sustainable management plan that recognises the importance of this species to the inshore commercial fleet and recreational sea anglers.
- 1.6 That all relevant government departments and agencies ensure that they are in a position to act promptly and efficiently, to enable the government's promised modernisation and rejuvenation of the industry.

The stocks available locally to inshore fishers vary greatly season by season and from year to year. The Pool system operated by the MMO lacks adequate flexibility to allow for this and its shortcomings are the cause of considerable frustration to local fishers. A properly designed effort scheme could enable the inshore fleet to make a decent living whilst safeguarding fish stocks for the future.

In 2020 Defra sought views on running an effort pilot and a community quota scheme trial. There were high levels of positive interest among respondents about both possibilities. Defra has indicated that it will be following up these expressions of interest in summer 2021.

Bass are a commercially important species and have the potential to become much more so for the regional fleet, particularly among inshore vessels. The stocks were seriously threatened by over-fishing. Following representations by the UK to the European Commission, tight controls have been in place since 2015. There are encouraging signs that the bass stocks are recovering. Now is the time to plan for how the stocks should be sustainably managed in future, to bring economic benefit to local coastal economies.

## 2. Maximising the local economic benefits of fish landings

We recommend:

- 2.1 That changes to the Economic Link fishing licence condition should bring maximum economic benefit to coastal communities and that regionally, plans are made to make best use of the opportunities presented.
- 2.2 That the government should ensure that there is full transparency about the beneficial ownership of UK registered vessels and the efficacy of the Economic Links is closely monitored and kept under regular review.
- 2.3 That the MMO should change its approach to trading and valuing quota for the Pool to optimise the economic value to the under 10m fleet.

The government has announced its intention to strengthen the Economic Link. Currently, it allows vessels to comply whilst contributing a small fraction of the value to the UK economy than if the vessels landed all their catch here. It also disadvantages the Pool because quota obtained under the gifting arrangements of the Economic Link often does not reflect the economic value to the UK, particularly to the inshore fleet.



### 3. Safeguarding the offshore area and reducing CO2 emissions

We recommend:

- 3.1 That all offshore demersal vessels fishing in the southern North Sea part of the UK EEZ should be restricted to 500 hp (370kW) power and that the use of beam trawls should be banned.
- 3.2 That the MMO should carry out regular and routine checks of vessels fishing the offshore area to ensure that there is full compliance with engine power restrictions.

We support the government's proposal to ban all forms of bottom trawling in the Dogger Bank marine protected area, and we have asked that steps are taken by Defra and the MMO to avoid or mitigate negative displacement of fishing effort by the vessels affected. Restricting engine power is part of the armoury for sustainable fisheries management. A study report for the EC in 2019 found that there was poor evidence of effective monitoring and enforcement among member states and that when conducting the study manipulation of the test by vessel operators was encountered mainly onboard North Sea beam trawlers<sup>1</sup>.



<sup>1</sup> Study on engine power verification by Member States, European Commission, 2019

## 4. Investment in supporting infrastructure

We recommend:

- 4.1 That investment needs and opportunities are identified at the various ports and harbours in East Anglia and that consideration is also given to the other parts of the supply chain including processing, repair and maintenance services and transport logistics.
- 4.2 That a pontoon is installed at Felixstowe Ferry.

This area of work will be taken forward through a combination of individual discussions with businesses about their needs and setting up an infrastructure working group. We will ensure that safety measures are a prime consideration. Landing fish and moving equipment remains high risk at Felixstowe Ferry.

## 5. Assist local fish processors and merchants to respond to post-Brexit market conditions

We recommend:

- 5.1 That the infrastructure working group should explore the scope for coordinated planning between processors, merchants, fishers and ports.
- 5.2 That support is provided to fishers, processors and merchants that have been adversely affected by the UK becoming a 'third country' when exporting to the EU.
- 5.3 That a finance facility and business support is made available to processing businesses to ensure that they are able to adapt and modernise.

The UK's third country status has led to extra costs and bureaucracy for fish exporters. These impact disproportionately on the smaller scale processors and merchants. Many exports of bivalve molluscs in England and Wales have found that they are no longer able to export to the EU. Solutions are being sought but the outcomes remain uncertain.

## 6. Recognise the contribution of recreational sea anglers to the local economy

We recommend:

- 6.1 That further work is undertaken with recreational sea angling bodies to establish how to protect and strengthen recreational sea angling's contribution to the local economy and jobs.
- 6.2 That consideration is given to the part played by recreational sea anglers to marine conservation and fisheries management.

## 7. Reduce the risks of aquaculture development and improve access to finance

We recommend:

- 7.1 That Defra gives urgent attention to addressing the problems that have arisen with the export of bivalve molluscs from the UK to the EU and provides all necessary support and assistance to those businesses affected.
- 7.2 That sea water quality issues affecting the shellfish industry should be accorded high priority, including the classification of waters, and that joint plans and commitments on water quality should be published by local authorities and the Environment Agency.
- 7.3 That the Crown Estate carries out an assessment to identify new sites suitable for aquaculture, invites interest in taking on leases, and where there is interest, invites bids and prepares the licencing and permitting of those sites as part of its service.
- 7.4 That a finance facility is set up, offering non-concessionary loans and technical assistance for the creation of new and the expansion of existing aquaculture sites.
- 7.5 That research is carried out to devise and test yield-enhancing husbandry techniques for shellfish culture.
- 7.6 That there should be greater clarity from the regulatory authorities on the acceptability of cultivating triploid Pacific Oysters.

Clean water is essential for the cultivation of shellfish. If the relevant bodies worked together and provided evidence of effective joint action it would help de-risk aquaculture development and investment. The problems that have arisen as the result of Britain having third country status when exporting to the EU have highlighted the scale and impact of regulatory risk for businesses. All regulatory authorities should be fully mindful of this and should ensure that they have an in-depth understanding of how the fish and shellfish industries operate.

The Crown Estate has the know-how and political clout to ease the route to authorisations for aquaculture development. Because it is an unusual business and following the difficulties experienced in exporting to the EU, aquaculture farms might find it difficult to obtain finance from banks. A specific finance facility may be needed.

REAF will continue to keep under review the needs of aquaculture businesses in East Anglia in the light of current uncertainties.

## 8. Attract and train new entrants to the fishing industry

We recommend:

- 8.1 That a regional training programme should be established that will equip participants for a successful ongoing career in the fishing industry. This should include training and support to enable fishers in East Anglia to play a full part in the co-management of fisheries.
- 8.2 That an apprenticeship training course for future skippers should be established as part of the programme, with central government funding support to enable trainees to take home a competitive wage.
- 8.3 That tailored finance is made available to graduates from the apprenticeship training course and the training programme to help them acquire a vessel and a licence.
- 8.4 That there should be a broad review of the barriers to new entrants to the fishing industry, particularly the barriers faced by young people. The aim should be to find ways in which the industry can replenish its workforce and offer an attractive career.

A high proportion of fishers in East Anglia will be retiring over the next five years. There is a need to replenish if the local industry is to have a future. The barriers to entry are varied and considerable and there have to be sufficient economic opportunities to make it worthwhile for people to want to join and stay in the industry.

Work is in hand by the East Coast College in Lowestoft, to set up an apprenticeship course, which it is hoped can be piloted later this year. This is a useful first step. New entrants continue to face the high cost of purchasing a vessel and a licence and there are other major barriers to entry. There should be a comprehensive look at all these elements and a plan pulled together to make joining the fishing industry an attractive and feasible career option.

Training and skills development are not one-off exercises. Fishers and others in the industry need to be able access training and to upskill throughout their career. We will explore opportunities and options relevant to all sectors and seek funding support to enable all in the regional industry to benefit.

## 9. The regulatory system should be joined up and not fragmented

We recommend:

- 9.1 That the MMO and the IFCA should seek constant improvement in the way they work together and should avoid wasteful and inefficient duplication.
- 9.2 That IFCA should set out in their annual plans how they will co-ordinate their actions with the MMO and the MMO, in its annual report, should include an appraisal of the level of coordination achieved between the MMO and IFCA.
- 9.3 The MMO and the IFCA should seek to achieve a system of control with low regulatory risk, through clear and early signalling of future intentions and following the Better Business for All approach<sup>2</sup>.
- 9.4 That the controls on gear use should be harmonised between the IFCA and the MMO.
- 9.5 That when fishers take up appointments within regulatory authorities as representatives of the fisher sector, they should be paid for their time at an appropriate market rate.

Defra has ruled out creating a single structure combining the IFCA and the MMO, as an efficiency and cost effectiveness measure. The different organisations continue to have different rules either side of the 6 mile line and have not succeeded in combining their rule making, despite the MMO having a quality assurance role. It adds to the difficulty of enforcement and is confusing for fishers. Fishers report that inspectors from the MMO and the IFCA frequently carry out duplicate inspections in which the same checks are carried out. This could be avoided if there was better communication and coordination.



<sup>2</sup> <https://www.gov.uk/guidance/better-business-for-all>

## 10. Manage stocks as a mixed fishery and implement more effective controls of fishing mortality

We recommend:

- 10.1 That the clear objective of controls should be to manage all stocks to maximum sustainable yield (MSY) in a manner that reflects the reality of mixed fisheries.
- 10.2 That the southern North Sea should be managed as mixed species fishery.
- 10.3 That quota allocations and catch limits should be in line with the requirements of the landing obligation ('discard ban'), and that funding and practical support should be available to assist fishers trial new gears designed to minimise bycatch.
- 10.4 That data should be collected for all commercial species, unless it is prohibitively expensive to do so and that local fishers should be given the opportunity to participate and advise.
- 10.5 That when a ban on catching a stock has been introduced it should be reviewed annually.
- 10.6 That the landing of demersal fish in roe should be avoided, if necessary through real time closures.
- 10.7 That gear mesh sizes should be slowly increased and pot escape panels made mandatory for appropriate species to avoid the capture of juveniles.

Fisheries should be managed to a target biomass and not fish mortality alone. Both are important. Many fishers in the region fish for multiple species. Species interact with each other and some stocks are the prey species for another species. The fishery is not currently managed on this basis, leading to displacement of effort and unintended outcomes.

Choke species continue to be a problem when it comes to the landing obligation, though exceptions allowing the discarding of species with high survival rates have helped. The principal difficulty is mismatch between quota availability and commercial reality. Trialling and purchasing alternative gears to minimise bycatch is prohibitively expensive for small scale fishers, with no guarantee of sufficient pay back. The cost and risk should be underwritten by Defra in order to incentivise and enable sustainable fishing practices.

Many stocks are data deficient making managing those stocks an uncertain business and puts at risk the marine ecology and the livelihoods of fishers. Good fisheries management relies upon obtaining good data and keeping this under regular review. Fish bearing roe are carrying the next generation of fish and juvenile fish are the harvest of the future. They should be protected in line with good fisheries management practice.

## 11. Make more use of data to manage potential conflicts between fishers and other marine activities

We recommend:

- 11.1 That vessel positioning and landings data should be compiled, analysed and the findings shared with the Crown Estate, to help minimise potential conflicts when the Crown Estate is considering future wind farm and other developments. Data supplied by fishers to the regulatory bodies should be treated as commercially sensitive.
- 11.2 That planning and consenting decisions should take into account the safety implications of additional steaming times for fishing vessels resulting from navigational restrictions, and spatial fishing restrictions should respect good navigational practice.
- 11.3 That precautionary measures are taken when clearing unexploded ordnance when constructing new offshore wind farms to minimise more effectively damage to wildlife, including sea mammals, fish stocks and their natural habitats. New techniques for disposal are available and these should be employed whenever possible.
- 11.4 That consultation processes for marine development proposals affecting the fishing industry should take into account that fishers are remote workers whose working hours often do not correspond with those of the regulators and developers.

### Delivery Framework

We have agreed a delivery framework encompassing:

- Establishing REAF as an independent industry-led organisation
- Further developing the East Anglian fisheries and seafood network, as part of REAF
- Developing mutually beneficial partnerships
- Constructing and implementing a marketing and communications strategy
- Lobbying and seeking to influence for the benefit of East Anglian fishing communities and businesses
- Providing businesses support



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## Renaissance of the East Anglian Fisheries

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