

Consultation on Inshore Fisheries and Conservation Authority District Boundaries

Response from Wildlife and Countryside Link

April 2009

Wildlife and Countryside Link (Link) is a coalition of the UK's major voluntary organisations concerned with the conservation, enjoyment and protection of wildlife, the countryside and the marine environment. Taken together, our members have the support of over 8 million people in the UK.

This response is supported by the following member organisations:

- Buglife – The Invertebrate Conservation Trust
- Marine Conservation Society
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- WWF - UK

Link strongly supports the proposals for the creation of IFCAs in the Marine and Coastal Access Bill. We are committed to working with Government and other stakeholders to ensure that the new system for inshore fisheries and environmental management is robust and delivers benefits for the environment.

For many years we have supported the modernisation of the inshore fisheries management system (currently delivered by the SFCs), including an expansion of the environmental stewardship role of the SFCs, re-balancing Committee membership between local authority appointees and other (fisheries and environmental) interests, and reducing the number of SFCs around the coast, to cover the entire English coast with a smaller number of management bodies of a more consistent size. The proposals in this consultation for setting the boundaries of the new IFC districts do not therefore open up an entirely new discussion, but instead revisit some of the options considered as part of the 2004 'Bradley' Review of Marine Fisheries and Environmental Enforcement. Our opinions on the costs and benefits of different arrangements of management districts around the coast are largely the same as they were in 2004, although Government's preferred option has changed.

We support Option 3 (creation of 6 IFC districts) rather than Option 2 (creation of 10 IFC districts) because we believe there are real advantages to be gained by rationalising the size and distribution of IFC Authorities around the coast, and reducing the number of authorities managing England's inshore fisheries significantly. We also believe that this option offers the most scope for bringing about cultural change from the existing SFCs, giving a strong signal that the IFCAs are new bodies with new responsibilities and powers, and that it should not merely be 'business as usual' for the erstwhile SFCs.

However, our support for Option 3 is not unequivocal as we do not see the logic behind retaining Cornwall as a separate district to the rest of the south west. At the time of the Bradley Review, we supported the preferred option put forward (Annex 13, pg 111) and

we would rather see a similar distribution of the IFC Districts (with adjustment to the border between Wales and the South West region to take into account the fact that the Welsh Assembly Government is taking inshore fisheries management in-house and abolishing the SFCs there). We would welcome explanation of why this option has not been considered this time round, given that it was Government's (and our) preferred option in 2004.

Consultation Questions

We have provided answers to the consultation questions where we have information or an opinion to contribute below.

Q1. Do you have any comments on how representation of local authorities should work where there are many local authorities feeding into one IFC district?

Q2. Do you have comments on what the maximum number of committee members sitting on any one IFCA should be?

Q3. Do you have any comments on how representation of local authorities should work where there are more than 7 local authorities within one IFC district?

The Marine Bill White Paper originally proposed that the maximum number of committee members on any IFCA committee should be 15. The Policy Paper accompanying the draft Marine Bill then suggested that the maximum number of committee members should be 21, a maximum of one-third of which should be local authority members, with the remaining seats taken by the MMO, Natural England and the Environment Agency, plus fisheries and environmental representatives appointed by the MMO.

While we recognise that it is important to retain local authority involvement for the IFCAs, we were supportive of Government's suggestion of capping the number of local authority members, in order to guarantee better representation for both fisheries and environmental interests on the committees. This should in turn lead to better informed decision making by the committee.

The proposal for a maximum committee size of 21, of which a maximum of one third could be local authority members, would give a maximum of 7 local authority members for the largest committees. Where there are 7 or fewer local authorities contributing to an IFCA, this should not cause any problems but we can see that the situation will be more difficult where there are more than 7 local authorities within one IFC district. In our view, the overriding concern is that the local authorities should not be over-represented in an IFCA Committee, at the expense of fishing and environmental expertise. Therefore, where there are many local authorities contributing to one IFCA, either the maximum size of the committee must be increased, to allow for representation from each local authority, plus an increase in the number of fisheries and environmental representatives, or the local authorities involved need to come to some arrangement between themselves to keep their representation on the Committee at or below 7 members.

Q5. How well do you think our current proposals for aligning IFC district boundaries with those of local authorities would tackle existing gaps in inshore fisheries management?

We support proposals for aligning IFC district boundaries with those of local authorities. We are keen that existing geographical gaps in inshore fisheries management are closed when the new system is put in place, and aligning IFC district boundaries with those of local authorities will help to achieve this. Equally, it should increase the local

authority contributions to IFCA, which will help to improve IFCA financial stability, and their ability to invest in capital equipment. These are all positive changes from the point of view of increased quality of inshore fisheries management.

Q6. Do you have any comments on the impacts of establishing 6 IFC districts
Q7. If larger districts are created, are those suggested here the best configuration.
Q8. Do you have any comments on the impact on inshore fisheries enforcement of establishing 6 IFC districts.

Of the options presented, our preferred option is Option 3, which suggests establishing 6 IFC districts. However, as stated in our introductory remarks, at the time of the Bradley Review in 2004 we supported the then preferred option for modernising the SFCs and reducing their numbers to 5 around the English coast, and this is still our position. We feel that ignoring this previously presented option would be to ignore all the good work that went into the Bradley Review and the earlier 2002 English Nature report "Inshore Fisheries Management in England and Wales: Facing up to the challenges of the 21st Century", which both presented excellent arguments in favour of streamlining the existing system of inshore fisheries management bodies around the English coast, and both recommended reducing the number of inshore fisheries management bodies to 6 (5 for England only).

We believe that one of the most important impacts of establishing 6 IFCA districts around the English coast in place of the current system of SFCs will be to induce a culture change within the new organisations and a shift in attitudes. The new boundaries should send a clear signal to the existing SFCs that the new IFCA, with their new roles and responsibilities, must be significantly different from the SFCs - clearly the option encompassing the most change (Option 3 - or our preferred option from the 2004 Bradley Review) is most likely to send that kind of signal effectively.

Link also believes that there are inherent advantages to a reduction in the number of districts, and a standardisation of size around the coastline. As stated in the 2004 Bradley Review (para A13.3, pg 105), alongside the 'economies of scale' benefits, advantages of amalgamating SFC districts (or creating larger IFC districts) would include:

- staff personal and professional career development
- flexibility in management and organisation
- whole region approach to byelaw making and enforcement
- targeting of resources
- more opportunities for exposure of staff to a variety of fishing sectors
- greater breadth of staff experience
- easier and more effective opportunities for enforcement planning across region
- continuity and easier transition for fishing industry across a region
- senior staff recruitment is easier in larger organisations

We recognise that there are some concerns about the creation of large IFC districts around the coast causing logistical difficulties, and losing the local knowledge and involvement that the SFCs benefit from. However, even the largest district proposed under Option 3 - the North Eastern district - would only be about the same size as existing North West and North Wales SFC district. The proposed IFC districts in Option 3 may look large compared to some of the small SFC districts that currently exist

(e.g. Cumbria) but in fact they are not large management districts when compared to systems of inshore fisheries management elsewhere in the world, notably the state system in Australia and the state of Victoria in particular (www.dpi.vic.gov.au/fishing). We do not believe that creating the districts proposed in Option 3 would necessarily lead to a significant loss of local knowledge and involvement in the inshore fisheries management process. The establishment of sub-offices within the new, larger IFC districts could further help to ensure the retention of local knowledge and involvement, and would help to reduce the impact of changes on existing SFC staff and committee members (e.g. in terms of travel time to meetings).

The main concern when considering options for change must be which management framework is likely to deliver the most effective network of fisheries and conservation management for England's inshore marine districts. While we appreciate that local involvement and the incorporation of local knowledge has been a strength of the current SFC model in many circumstances, we also believe that the close involvement of the local industry has in some cases reduced the capacity for impartial management of resources, particularly where decisions over long-term sustainable resource use and the needs of the industry have been in consideration. The new system must seek to incorporate local knowledge and representation in a way that does not hinder reasoned, impartial decision making.

Although we are in favour of Option 3, and the creation of larger IFC districts, we are not convinced that the configuration of districts put forward in Option 3 is necessarily the best option. We would be very interested to know why the preferred option in Annex 13 of the Bradley Review (see map, pg 111) has not been included in this consultation. In particular, it is not immediately clear to see the advantages of keeping Cornwall as a separate district from the rest of the South West. Indeed to do so would be to perpetuate the problem currently faced by Devon Sea Fisheries Committee where two coastlines – separated by another Sea Fisheries District – have to be managed with a single patrol vessel. While there are practical solutions to this – for example in the past agreement has been reached resulting in the Cornwall SFC vessel patrolling the north Devon coast – this is a shortcoming of the current regime which should be improved upon with new legislation rather than perpetuated.

Q10. Do you have any comments on the social impact of establishing IFC districts as proposed?

Q11. Do you have any comments on the economic costs and benefits of establishing IFC districts as proposed?

Social benefits are often difficult to quantify or measure. However, if the new system of IFC districts and Authorities delivers the improvement in service and management function that is expected, then the outcome should be a healthier marine environment and more productive fisheries, which lead to, and are in themselves, significant social benefits.

Currently there is a wide variation in the offshore capabilities of the different SFCs (type of vessel used etc). In most cases, it is this function that represents the single biggest financial cost to the existing SFCs, and is therefore one obvious area where the creation of larger management districts has the potential to deliver significant cost savings and improvements in service delivery. In operational terms, most offshore patrol vessels are used on a daily basis to conduct circular patrols from home port to fishing area and back. Link does not believe that providing such a resource for each IFC district under Option 2

(proposing 10 IFC districts) represents the most effective use of staff and resources. This may become an even more pertinent question in the future e.g. with high fuel prices putting extreme pressure on patrol resources. Into the future, it is increasingly likely that there will be opportunities to use technological solutions where historically patrol vessel surveillance has been required e.g. the use of small scale satellite VMS systems – however there will always be a requirement for some offshore enforcement capability. We believe that a concentration and review of offshore capabilities will be essential if the new IFCA's are to improve delivery in this area.

Conclusion

Link supports a reduction in the number of fisheries management districts around the English coast, and some standardisation of the size of districts. From the options presented in the consultation document, our preferred option is Option 3, though we believe that the preferred option from the Bradley Review in 2004 could present a better option still, and would welcome information on why this option was not included in the current consultation.

We do not feel that either the generic assessment of impacts or the full Impact Assessment address the relative merits of options 2 and 3 fully. In particular, we feel that too much weight is given to Option 2 merely because that represents the least amount of effort to put in place. The introduction of the Marine and Coastal Act, and the subsequent implementation of the provisions of that Act represent a great opportunity to achieve real and lasting change to the current inshore fisheries management system. The creation of IFC districts in particular will be a key step, and presents a good opportunity to send a strong signal that the IFCA's will be very different bodies to the existing SFCs. Option 3 (or a variation along the lines of the preferred option of the Bradley Review) gives the best chance of making the most of that opportunity and we urge the Government not to squander it by settling for what seems to be the easiest option involving the least change.

**Wildlife and Countryside Link
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