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**Natural
Resources
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F.A.O. Catch Recording Consultation Co-ordinator
Marine Management Organisation
Lancaster House
Newcastle upon Tyne
NE4 7YH
02 April 2019

By email

Response to consultation on the introduction of catch recording for licensed fishing boats under 10 metres in length

Dear Marine Management Organisation, Defra and Welsh Government,

Natural Resources Wales (NRW) welcomes the opportunity to respond to the consultation on the introduction of catch recording for licensed fishing boats under 10 metres in length.

The statutory purpose of NRW is set out under the Environment (Wales) Act 2016. In the exercise of its functions under that Act, NRW must pursue the sustainable management of natural resources in relation to all its work in Wales, and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty, in common with the other public bodies that are covered by the Well-Being of Future Generations (Wales) Act 2015, is to carry out sustainable development.

NRW is also a Statutory Nature Conservation Body (SNCB) under the Conservation of Habitats and Species Regulations 2017, as further amended by paragraph 189 of the Natural Resources Body for Wales (Functions) Order 2013, and an advisor to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

Please find NRW's response to the consultation below. This is provided in the context of NRW's statutory purpose, functions and duties outlined above.

If you require any further information please contact Sean Evans, Marine Fisheries Advisor via sean.evans@cyfoethnaturiolcymru.gov.uk or 0300 065 3712

Yours sincerely

A handwritten signature in black ink that reads "Keith Davies". The signature is written in a cursive style with a large 'K' and 'D'.

Keith Davies
Planning, Landscape, Energy and Climate Change Manager

Cc: Keith Davies (NRW)
Ann Purser (NRW)

NRW Response to the joint Defra and Welsh Government consultation on the introduction of catch recording for licensed fishing boats under 10 metres in length¹

Consultee information (optional)

1. *What is your name?*

Natural Resources Wales

2. *What is your email address?*

sean.evans@cyfoethnaturiolcymru.gov.uk

3. *What category best describes your interest in this consultation?*

Government Sponsored Body – Environment / Conservation

4. *If you are a vessel owner or operator, where is your vessel licensed?*

Not applicable

5. *Would you like your response to be confidential?*

Natural Resources Wales is content for this response to be made publicly available.

Consultation questions

1. *It is proposed that vessels catching and retaining species subject to quotas will record their catch (via a specially developed app) before the fish have been removed from the vessel. Those that catch and retain only non-quota species will have 24 hours, from landing, to record their catch via the mobile app or online. For all catches a declaration will need to be submitted within 48 hours (using a mobile device, personal computer or laptop) providing accurate weights of all species landed. What are your views on the proposed approach and policy?*

NRW is proud to be leading the way to a better future for Wales by championing the Welsh environment and the sustainable management of Wales' natural resources.

NRW acknowledges the potential benefits that improved data gathering and a greater understanding of the activities of under 10 metre fishing boats could provide in terms of the evidence required for the sustainable management of marine fisheries. As such, NRW supports the Defra / Welsh Government proposals to introduce, by way of a licence condition, mandatory catch recording requirements for all English and Welsh licensed fishing boats under 10 metres in length from summer 2019.

¹ https://consult.defra.gov.uk/mmo/consultation-on-the-introduction-of-catch-recordin/consult_view/

NRW notes that the proposed recording requirements will build and improve upon existing data gathering methods, thus enabling the application of near real-time, responsive management of fisheries resources for the benefit of both present and future generations. In this regard, NRW considers that the proposals are well aligned with several of the principles of the sustainable management of natural resources (i.e. adaptive, evidence led management) set out under the Environment (Wales) Act 2016, and the ways of working under the Well-being of Future Generations (Wales) Act 2015.

NRW welcomes that the proposals would, in effect, achieve a level of parity between the reporting requirements for under 10 metre vessels, and those currently required of 10 metre and over vessels under the existing Common Fisheries Policy management regime, through Council Regulation (EC) 1224/2009 and Commission Implementing Regulation (EU) 404/2011. NRW welcomes the inclusion of non-quota species in the catch recording proposals and supports this inclusion as an important component of the evidence required, alongside comprehensive stock assessment, fishing effort and fishing distribution data, to sustainably manage these fisheries.

2. What challenges will you face as a consequence of this new requirement?

Not applicable.

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

Existing reporting requirements for 10 metre and over vessels are set out in detailed regulations. These requirements include, among other things, that masters of such vessels provide information on the type of gear used and geographical area in which catches are taken. NRW notes that, similarly, the existing Scottish reporting requirements include a requirement for the provision of information on the location of fishing activity and the type and quantity of gear used². The current proposals specify catch and landings reporting detail only and do not provide any detail in relation to potential fishing activity reporting requirements. NRW would welcome discussion on the merits of improved activity specific recording and the potential benefits that innovative and integrated technological solutions, such as gear in gear out technology coupled with proposed vessel monitoring system requirements³, could provide in this regard.

Whilst the proposals are not intended to apply to European Union or third country vessels operating in English or Welsh waters at present, NRW welcomes that the policy intent, in relation to Welsh waters under certain scenarios at least, is for the management and regulation of such vessels to be aligned with that applied to domestic vessels, as noted in the Explanatory Memorandum to The Sea Fish Licensing (Wales) Order 2019⁴ for example.

² <https://www2.gov.scot/Resource/0050/00502079.pdf>

³ <https://gov.wales/vessel-monitoring-systems-fishing-boats-wales>

⁴ <http://www.assembly.wales/laid%20documents/sub-ld12374-em/sub-ld12374-em-e.pdf>

NRW strongly advocates a transparent, evidence led and holistic ecosystem-based approach to fisheries management and welcomes the potential contribution that the proposed catch recording requirements could make in relation to the sustainable management of marine fisheries, and wider marine management more generally, through marine spatial planning for example.