COAST response to: Improving inshore fisheries data: consultation on requiring electronic tracking and monitoring technology on under 12 metre commercial fishing vessels

1. What is your opinion on the proposal to require a tracking device on all under 12 metre commercial fishing vessels transiting or fishing within the Scottish zone, and Scottish registered under 12 metre fishing vessels wherever they operate?

Agree

Please explain your answer

An effective vessel tracking system for all commercial fishing vessels operating in Scottish waters is long overdue. A vessel monitoring system is essential not only for fisheries compliance monitoring and enforcement, but also to improve understanding and provide information about fishing activity to help inform and improve fisheries management including spatial fisheries management measures to support lower impact fisheries (creel fisheries hand collection by divers) that make up a significant proportion of the fishers operating in Scotland's inshore waters.

We are, therefore, in support of the proposal for all under 12 metre commercial fishing vessels transiting or fishing in Scottish waters (regardless of nationality) to be required to carry a vessel tracking device and for this requirement to apply to Scottish registered under 12 metre vessels wherever they operate.

The proposed measures are necessary to fulfil Scottish Government commitments set out in the Joint Fisheries Statement and the Bute House Agreement.

The proposed timescale for introducing this by 2026 is far too slow. While a tranched system of installing the tracking devices may be helpful in rolling out tracking devices to all vessels, there should be a much more aspirational aim to complete this sooner, but the end of 2024 at the latest.

We consider that a similar requirement for such a vessel tracking system must also be applied to vessels over 12 metres. Whilst these larger vessels are required to carry VMS, we consider that all vessels fishing in Scottish waters irrespective of size, should be required to carry a similar tracking system that records position at much greater frequency than the VMS system. Failure to do this will create an unfair disparity in the standards being applied to smaller inshore vessels and the larger over 12 metre fishing fleet and does not make sense from a fisheries management perspective.

2. What is your opinion on the proposal that the use of vessel tracking devices on under 12 metre commercial fishing vessels should be complemented by the use of Remote Electronic Monitoring (REM) on a number of vessels?

Agree

Please explain your answer

Remote Electronic Monitoring (REM) is an essential aspect of fisheries monitoring and management that is not only beneficial for regulating fisheries (e.g. monitoring illegal fishing and overfishing, bycatch, discarding and compliance with gear requirements), but also supports more informed fisheries management decisions by providing information about fish and shellfish stocks and the wider impact of fisheries on the marine environment.

The impact of different fisheries vary considerably and it is well documented that bottom trawl and dredge fisheries have the greatest impact on seabed habitats as well as high rates of bycatch. Furthermore the Scottish Marine Assessment 2020 identifies that fishing, especially methods that involve towed, bottom-contacting gear, is regarded as the most geographically widespread direct pressure-causing human activity across all Scottish inshore and offshore marine regions.

We welcome the roll out of REM to the Scottish scallop dredge fleet and the intention to make REM mandatory on all scallop dredge vessels in Scottish waters. However, this requirement needs to also be extended to all trawl vessels (under and over 12 metres) as a matter of priority. Failure to include over 12 metre trawl vessels within the requirement for REM is a serious omission.

3. What is your opinion on establishing REM fleets of under 12 metre commercial fishing vessels based on the parameters set out in paragraph 16 of the consultation paper (copied below for ease of reference)?

"16. From a compliance perspective, REM fleets could comprise vessels selected on a risk-based approach, for example in relation to fishing location, target species or gear in use. From a scientific evidence perspective, the majority of our inshore commercial fishing vessels target non-quota stocks that are not currently subject to catch or effort limits. Using REM on a number of active inshore vessels would be a good way to improve monitoring and management of these stocks. Vessels could be selected based on catch volume, catch rate; or based on spatial considerations such as areas of high fishing intensity."

Disagree

Please explain your answer

As we have responded to Qu 2, the impact of different fishing activities varies considerably, with towed bottom trawl and dredge fisheries having much greater impact on the seabed and marine ecosystem function as well as much greater bycatch than the lower impact fisheries of creeling and hand diving.

Marine Scotland's data shows that reference fleets are not a useful approach because they have been shown to act differently to the rest of the fleet and therefore not provide an accurate representation. A logical basis for a risk-based approach is to prioritise REM for those fisheries sectors that have the greatest impact. On this basis, and in light of the issues with a reference fleet, REM should be required on all dredge and trawl vessels (under and over 12 metres) as a matter of priority.

4. We consider the high resolution data collected from vessel tracking devices and inshore REM systems to be valuable for fishers and the industry as a whole. Which attributes do you see as being valuable?

ALL

> Providing evidence of fishing activity for the purposes of informing decision making in relation to the shared marine environment, such as offshore renewable developments and aquaculture licensing.
> Improving the marketability of produce by providing consumers with accurate information on catch locations, which may improve their confidence when purchasing seafood.

> Helping to prevent and resolve conflicts at sea which can arise as a result of gear positioning, and in doing so avoid or reduce associated business disruption.
> Other effects

Please explain your answer

High resolution data from vessel tracking and REM systems are invaluable to help inform fisheries decisions as well as ensure compliance with fisheries measures. The data is important to help mitigate gear conflict and to support the interests of low impact fisheries in fisheries management and marine planning decision-making.

The data from vessel tracking and REM systems is also extremely valuable in terms of improving the transparency of fisheries which is important for both fisheries management and consumer confidence. However, the benefits of this can only be realised if the data is made publicly available. Fish stocks are a public asset/resource and as such the public should have ready access to information about the operation and management of fisheries.

5. Do you agree with the assessment of impacts in the partial Business and Regulatory Impact Assessment?

Yes
No

Not answered as didn't have time to look at this.

6. Are there any further vessel tracking matters relating specifically to inshore fishing that should be considered as part of this consultation?

Yes

Please explain your answer

As we have commented earlier, the proposed timescale for introducing this by 2026 is far too slow. While a tranched system of installing the tracking devices may be helpful in rolling out tracking devices to all vessels, there should be a much more aspirational aim to complete this sooner, but the end of 2024 at the latest.

Devices used need to be fit-for-purpose and tamper-proof, and required to be switched on and operational at all times whenever the vessel is in use (transit or fishing).

The frequency of the signal (ping) rate for all vessel monitoring systems (not just under 12 metre vessels) needs to operate at intervals of a few seconds to provide more effective data for compliance monitoring, enforcement, fisheries management and transparency.

7. Are there any further REM matters relating specifically to inshore fishing that should be considered as part of this consultation?

Yes

Please explain your answer

As we have commented in response to question 1, we consider that a similar requirement for vessel tracking system that is proposed for under 12 metre fishing vessels must also be applied to vessels over 12 metres. Whilst these larger vessels are required to carry VMS, we consider that all vessels fishing in Scottish waters irrespective of size, should be required to carry a similar tracking system that records position at much greater frequency than the VMS system. Failure to do this will create an unfair disparity in the standards being applied to smaller inshore vessels and the larger over 12 metre fishing fleet and does not make sense from a fisheries management perspective.

As we have commented in response to question 2, prioritisation of REM rollout should focus on the mobile bottom dredge and trawl fisheries and include over 12 metre trawl vessels as well as under 12 metre bottom trawl vessels.