



The network for environmental, countryside and heritage NGOs In Wales

Consultation Response: Vessel Monitoring Systems for Fishing Boats

May 2019

Response

WEL has provided a short response to the consultation to show support for the proposals.

We strongly support the proposal to introduce Inshore Vessel Monitoring Systems (iVMS) for all licensed British fishing boats under 12 metres in length, operating in Welsh waters and all Welsh fishing vessels under 12 metres wherever they are operating (including outside of Welsh waters).

We fully support the contention that introducing iVMS to these vessels will provide a more accurate picture on fishing location and activity which will better inform fisheries management and help create more sustainable fisheries in the future. As cited in the Regulatory Impact Assessment *“97% of the Welsh fishing fleet are under 12 metre and therefore, if there is no change, future management decisions will have to be made using limited and incomplete information.”*

This positive move to real-time management of fisheries by the Welsh Government should not be used solely for reactive surveillance and enforcement measures. We would like consideration to be given by the Welsh Government as to how the stored VMS data can be analysed to support marine biodiversity and conservation. For example, VMS data could be used to support Marine Strategy Framework Directive descriptor reporting (e.g. on sea floor integrity and underwater noise); monitoring of fishing activity in protected areas where relevant regulations are in place¹; and helping to address any IUU (illegal, unreported and unregulated fishing) in Welsh waters. This data could also be shared on the Marine Planning Portal. We hope to see such analysis factored into the upcoming Welsh Government Marine Evidence Strategy.

WEL would also like to reiterate our interest in, and support for, a catch reporting system for the under 10 metre fleet, as described in the consultation. We agree that this *“type of system combined with VMS would give a more complete picture of current fishing levels in Wales and will assist with ascertaining whether they are sustainable.”*

Whilst VMS is important for management and compliance with spatial measures, CCTV has been shown to be a cost effective tool to support the collection of important catch and bycatch information. It can also help demonstrate compliance with the landing obligation and measures to avoid prohibited species and/or stocks. CCTV is being successfully used in several countries, including Australia, New Zealand and Canada and should be prioritised for widespread adoption in Welsh (and other UK) fisheries as an important and complementary tool to VMS.

¹ WEL would interested in whether additional pinging can take place when a vessel enters a marine protected area.

Lastly, as there is considerable international operational practice in using VMS, we would like to draw attention to the case studies on the FAO's website². There have also been observations in Sweden, shared with the European Commission³, regarding the need for greater frequency of VMS pings for vessels when within Marine Protected Areas, for example, they suggest pings every 30 minute frequency to support the controllability of fishing fleets. We note that the consultation does not detail current Welsh Government thinking on the potential frequency of transmission position information for under 12 metre vessels, as such we would request to be consulted on this in the future.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is a respected intermediary body connecting the government and the environmental NGO sector in Wales. Our vision is a healthy, sustainably managed environment and countryside with safeguarded heritage in which the people of Wales and future generations can prosper.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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