HOUSE OF LORDS

European Union Committee

43rd Report of Session 2017–19

The EU fisheries landing obligation: six months on

Ordered to be printed 2 July 2019 and published 16 July 2019

Published by the Authority of the House of Lords

HL Paper 395

The European Union Committee

The European Union Committee is appointed each session "to scrutinise documents deposited in the House by a Minister, and other matters relating to the European Union".

In practice this means that the Select Committee, along with its Sub-Committees, scrutinises the UK Government's policies and actions in respect of the EU; considers and seeks to influence the development of policies and draft laws proposed by the EU institutions; and more generally represents the House of Lords in its dealings with the EU institutions and other Member States.

The six Sub-Committees are as follows:

Energy and Environment Sub-Committee
External Affairs Sub-Committee
Financial Affairs Sub-Committee
Home Affairs Sub-Committee
Internal Market Sub-Committee
Justice Sub-Committee

Membership

The Members of the European Union Select Committee are:

Lord Boswell of Aynho (Chair)
Baroness Brown of Cambridge
Lord Cavendish of Furness
Baroness Couttie
Baroness Donaghy
Baroness Falkner of Margravine
Lord Faulkner of Worcester
Baroness Hamwee
Lord Jay of Ewelme
Lord Kerr of Kinlochard
The Earl of Kinnoull
Baroness Neville-Rolfe
Lord Polak
Baroness Primarolo
Lord Ricketts
Lord Soley
Lord Teverson
Baroness Verma
Lord Wood of Anfield

The Members of the EU Energy and Environment Sub-Committee, which conducted this inquiry, are:

Lord Cameron of Dillington
Viscount Hanworth
Lord Krebs
The Duke of Montrose
Lord Rooker
Lord Selkirk of Douglas
Baroness Sheehan
The Earl of Stair
Lord Teverson (Chair)
Baroness Wilcox
Lord Young of Norwood Green

Further information

Publications, press notices, details of membership, forthcoming meetings and other information is available at http://www.parliament.uk/hleu.

General information about the House of Lords and its Committees is available at http://www.parliament.uk/business/lords.

Sub-Committee staff

The current staff of the Sub-Committee are Jennifer Mills (Clerk), Alexandra McMillan (Clerk), Jodie Evans (Committee Assistant) and Sally Dray (Committee Assistant).

Contact details

Contact details for individual Sub-Committees are given on the website. General correspondence should be addressed to the Clerk of the European Union Committee, Committee Office, House of Lords, London, SW1A 0PW. Telephone 020 7219 5791. Email euclords@parliament.uk.

Twitter

You can follow the Committee on Twitter: @LordsEUCom.

CONTENTS

Evidence is published online at https://www.parliament.uk/hlinquiry-implementation-enforcement-landing-obligation/ and available for inspection at the Parliamentary Archives (020 7219 3074).

Q in footnotes refers to a question in oral evidence.

SUMMARY

The landing obligation was agreed by EU Member States in 2013 with the aim of eliminating the practice of discarding fish at sea. This was widely considered to be a substantial change for the fishing industry. When we conducted an inquiry in late 2018, on the eve of the new rules coming fully into force, we heard significant concerns about the impact it could have on the UK's fishing industry, port infrastructure and supply chains.

We were, therefore, concerned to find that the full implementation of the landing obligation appears to have had little effect during its first six months, with only small quantities of fish that would previously have been discarded being landed and little evidence of fishers being 'choked' by a lack of quota. While we heard some evidence that this was due to changes in fishing practices, many witnesses also expressed scepticism that the rules are being complied with. Despite the six-year lead-in, the UK Government and devolved administrations still do not have mechanisms in place to monitor compliance: coupled with a lack of historic data on catches this means there is no way of knowing the extent to which illegal discarding is taking place.

Continued discarding of fish could cause serious damage to fish stocks; the current UK Fisheries Minister has described discarding as "environmental vandalism". And yet a significant number of exemptions to the landing obligation have been agreed, including for some of the species with the highest rates of discards. The EU has made significant progress in recent years in improving the health of the marine environment. Now fisheries ministers across the EU must ensure that the challenges the landing obligation poses for fishers and enforcement agencies do not result in a return to the 'bad old days' of short-term economic benefits overriding the long-term sustainability of fish stocks and the fishing industry.

The EU fisheries landing obligation: six months on

CHAPTER 1: INTRODUCTION

1. As part of the reform of the EU's Common Fisheries Policy agreed in 2013, Member States committed "to land all catches … of species which are subject to catch limits".[1] Known as the landing obligation, the aim of this measure was to "reduce the current high levels of unwanted catches and to gradually eliminate discards".[2] It is estimated that, prior to the introduction of the landing obligation in 2013, 1.7 million tonnes of fish and other marine animals were discarded in EU fisheries each year.[3]

2. The Regulation recognised that "unwanted catches and discards constitute a substantial waste and negatively affect the sustainable exploitation of marine biological resources and marine ecosystems and the financial viability of fisheries".[4]

3. The landing obligation was phased in gradually from 2015 and came into force in full on 1 January 2019. In November and December 2018, the EU Energy and Environment Sub-Committee, whose members are listed in Appendix 1, took evidence from the fishing industry, researchers, environmental groups and Government on the impact of the landing obligation during the phasing-in period and on how prepared the UK was for full implementation. The resulting report, published in February 2019, raised a number of concerns about the effect the new rules could have on the UK fishing industry and questioned whether enforcement agencies would be able to monitor compliance.[5]

4. Given these concerns, in May and June 2019 the Sub-Committee took evidence on the first six months of the landing obligation being fully in force. We are grateful to those who gave oral evidence and to those who provided written contributions, all of whom are listed in Appendix 2.

5. **We make this report to the House for debate**.

1 Council Regulation (EU) No 1380/2013 on the Common Fisheries Policy (OJ L 354/22, 28 December 2013)
2 *Ibid.*
3 ClientEarth *et al*, Joint NGO priorities on the revision of the EU Fisheries Control System (October 2018): https://www.documents.clientearth.org/wp-content/uploads/library/2018–10-23-joint-ngo-priorities-on-the-revision-of-the-eu-fisheries-control-system-coll-en.pdf [accessed 13 June 2019]
4 Council Regulation (EU) No 1380/2013 on the Common Fisheries Policy (OJ L 354/22, 28 December 2013)
5 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276)

CHAPTER 2: THE IMPACT OF THE LANDING OBLIGATION

A 'big bang'?

6. During our previous inquiry on the landing obligation, we heard that it was "the biggest change to the Common Fisheries Policy since its inception",[6] and "a very new approach … designed to be a very big change in fisheries management".[7]

7. When asked in May 2019, however, about the impact of the landing obligation coming fully into force, the Marine Management Organisation's (MMO's) Operations Director, Phil Haslam, said: "It was badged as a 'big bang' but the bang has been slightly less than expected."[8] This view was echoed by a number of witnesses,[9] including Jeremy Percy, Executive Director of the New Under Ten Fishermen's Association, who told us: "Very little has changed."[10]

8. **The landing obligation, which to a large extent prohibits the previously common practice of discarding fish at sea, is both a significant change and a significant challenge for the fishing industry. Despite this, the new rules seem to have had little impact since they came into force in full six months ago.**

The risk of chokes

9. In our previous report on the landing obligation we highlighted concerns that full implementation of the landing obligation was likely to result in a number of 'chokes'. This phenomenon, which is explained in detail in our previous report,[11] occurs when a fisher runs out of quota for one fish stock and then, even though they still have quota for other stocks, cannot continue to fish in that area because they cannot guarantee they will not catch more of the stock for which they have exhausted their quota.

10. When we asked witnesses in November and December 2018 about the likely scale of this problem, the National Federation of Fishermen's Organisations (NFFO) told us: "Chokes could cause vessels, or fleets, to tie up early in the year, with serious social and economic consequences."[12] Graham Doswell, a fisher from Eastbourne, stated that fishers would be "tied up within a week or two",[13] and skipper David Stevens told us: "For our fishery in the Southwest it is expected that the haddock choke … will tie up the fleet within 8 weeks."[14] The then Fisheries Minister, George Eustice MP, shared these concerns: "Our expectation is that … parts of the fleet could be choked and have to tie up half way through the year."[15]

11. It appears, however, that the risk of choke has not materialised. Witnesses offered a range of explanations. Barrie Deas, Chief Executive Officer of the

6 Oral evidence taken on 28 November 2018 (Session 2017–19), Q 11 (Barrie Deas)
7 Oral evidence taken on 5 December 2018 (Session 2017–19), Q 34 (Samuel Stone)
8 Q 73
9 Including Jim Pettipher, Chief Executive Officer of the Coastal Producer Organisation, and Pete Bromley, Harbour Master at Sutton Harbour (Q 64).
10 Q 64
11 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276), Chapter 4
12 Written evidence from the National Federation of Fishermen's Organisations (IEL0003)
13 Oral evidence taken on 5 December 2018 (Session 2017–19), Q 23
14 Written evidence from skipper David Stevens (IEL0001)
15 Oral evidence taken on 12 December 2018 (Session 2017–19), Q 63

NFFO, told us: "A combination of vessels avoiding unwanted catch in one way or another and the mitigation measures that have been taken has meant that up to now we have managed to avoid choke situations."[16] He continued: "Irish Sea whiting, for example, would have been closed in February had business as usual continued, but the mitigation measures, including the decisions made at the December Council, have definitely had an impact and removed the immediate choke risks."[17] Deputy Director for fisheries policy and negotiations at the Department for Environment, Food and Rural Affairs, Nigel Gooding, expressed a similar view: "The results of December Council managed to mitigate some of the choke risks that we were fearing."[18] We discuss the decisions made in the December 2018 meeting of the EU's Agriculture and Fisheries Council ('December Council') in more detail in Chapter 4.

12. Jeremy Percy offered a different perspective:

> "I spoke to a number of fishermen before this meeting … One chap said that it was pure luck, and a lack of fish on the ground, that had stopped things going wrong, and the failures of the MMO in dealing with the landing obligation. That mirrors a number of comments."[19]

13. **Given the widespread expectation that the landing obligation would result in vessels having to stop fishing within the first few months of this year, we were surprised to note that there appear to have been no instances of such 'choke' to-date.**

14. Witnesses cautioned, however, that the problem of choke could still arise later in the year. Barrie Deas told us: "We will have to see; this is May, and you would expect chokes, if they were to arise, to increase in intensity in the second half of the year."[20] This view was shared by Bertie Armstrong, Chief Executive Officer of the Scottish Fishermen's Federation,[21] and Phil Haslam.[22]

15. There are some mechanisms in place to enable fishers to obtain more quota, and so to potentially avoid chokes. During our last inquiry Hazel Curtis, Chief Economist at Seafish, told us:

> "Quota units, and the right to catch a tonnage of fish in a calendar year, can be moved among vessels, either within the same producer organisation or between different producer organisations. There are international swaps, and leasing of quota is sometimes done in exchange for money, but internationally it is typically done by swapping quota for quota, so there is a kind of barter system of quota in one stock for quota in another. That can make a big difference."[23]

16. Both Phil Haslam[24] and the Fisheries Minister, Rt Hon Robert Goodwill MP,[25] told us that quota swaps would be key to avoiding chokes later in the

16 Q 64
17 Q 65
18 Q 89
19 Q 68
20 Q 67
21 *Ibid.*
22 Q 73
23 Oral evidence taken on 28 November 2018 (Session 2017–19), Q 5
24 Q 85
25 Q 89

year. The Minister, asked if he thought that the choke risk could be avoided, said: "That will depend on the availability of inter- and intracountry swaps and other mitigation measures at our disposal."[26]

17. We examined the issue of quota swaps in detail in our previous report,[27] flagging the risk that the landing obligation could result in a reluctance to swap, increasing the risk of chokes occurring. Witnesses to this inquiry told us this remained a concern. Bertie Armstrong told us: "It is less fluid than it used to be because, naturally enough, each participating Member State will now start to look after their own responsibility not to be choked rather than swap fish away for commercial reasons."[28] Barrie Deas[29] and the South West Fish Producers Organisation (SWFPO) agreed.[30] Jeremy Percy highlighted the particular problems for smaller fishing businesses:

> "As with any commodity, it is about supply and demand, and … because of the unknowns about what is going to happen, the value of some quotas has already risen and will probably continue to rise dramatically over the year. That being the case, it will shut out those that do not have the financial resources to lease it."[31]

18. Phil Haslam told us: "I am hearing the same anecdotal evidence that getting hold of quota is more difficult and, if it is at a premium, the price will rise."[32] He added, however, that "the evidence so far this year is that swaps are relatively typical to other years".[33]

19. **The consensus among witnesses was that swapping and trading quota, both within the UK and between Member States, will be key to preventing chokes occurring later in the year.**

20. **There are concerns, however, that there is a greater reluctance to swap quota this year, causing the value of quota to rise and increasing the risk that it will be unobtainable by those who need it.**

21. **We therefore restate the recommendation of our previous report that the Government should work with the devolved administrations to put formal mechanisms in place to avoid vessels choking where there is sufficient quota available elsewhere in the UK, and to make the case to the European Commission for a similar mechanism at EU level. This should include specific consideration of the constraints experienced by the under ten metre fleet.**

The landing of undersized fish

22. Fish that are smaller than the minimum conservation reference size agreed by the EU cannot be sold for human consumption. As this makes them less valuable than other fish, fishers would previously have discarded them at sea. With the landing obligation now fully in force, however, fishers should

---

26 *Ibid.*
27 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276), paras 58–71
28 Q 67
29 *Ibid.*
30 Written evidence from the South West Fish Producers Organisation Ltd (IEL0024)
31 Q 67
32 Q 85
33 *Ibid.*

be bringing them ashore (where they can be sold for fish meal, bait, pet food etc).

23. In our previous inquiry we heard concerns that the port infrastructure and supply chains needed to receive, store and sell or dispose of these fish were not in place.[34]

24. In the present inquiry, however, the MMO told us that only 85 tonnes of fish below minimum reference size had been landed in the UK between January and May 2019. By comparison, 293 tonnes were landed in 2018 (when the landing obligation was only partially in force).[35]

25. Some witnesses told us that this was due to changes in fishing practices that allowed fishers to avoid catching the smaller fish. Bertie Armstrong told us: "In the mixed demersal fleet fishing around the northern North Sea and the west coast, we have largely eliminated the catching of small fish. You can do that largely with mesh sizes."[36] The SWFPO agreed: "Because of the improvements to net geometry and incorporation of selectivity innovations, I am convinced that most fishes that would have been discarded in the past are now selected-out of the nets alive on the seabed."[37] Pete Bromley, Harbour Master at Sutton Harbour, told us he had seen few undersized fish landed; something he attributed, in part, to the use of more selective fishing gear: "A lot of credit has to go to the fishermen for the efforts they have put in."[38]

26. ClientEarth, the Marine Conservation Society and WWF, however, raised doubts about this explanation: "Whilst undoubtedly the application of new practices and selective gear developed in recent years will be having a beneficial effect, not all boats have embraced highly selective gear and in any event, we would still expect some small or undersized fish to be landed."[39]

27. Phil Haslam told us: "The focus of the landing obligation is the reduction of unwanted catch, so actually it could be a signal of success that there are not huge amounts of undersized fish being landed … It could be one measure that selectivity and the like is paying dividends."[40] But he also told us that it could be because "people are just discarding".[41] The Minister suggested the latter option was more likely: "I am a little disappointed that … the amount of fish landed that would otherwise have been discarded is actually a very small amount …. I would have expected a much larger figure."[42] He continued: "The evidence of those quite small quantities does not give me confidence that we are correctly applying the landing obligation."[43]

28. Phil Haslam told us that "a lack of consistent reporting" meant that "there is no way to cross-check to see if [the quantities of undersized fish landed] … is as it should be".[44] This echoes the concerns we heard in late 2018, that, because discard data were not routinely captured, it was not known

34 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276)
35 Q 82
36 Q 65
37 Written evidence from the South West Fish Producers Organisation Ltd (IEL0024)
38 Q 64
39 Written evidence from ClientEarth, the Marine Conservation Society and WWF (IEL0025)
40 Q 82
41 *Ibid.*
42 Q 88
43 Q 92
44 Q 82

what quantities of fish below minimum conservation reference size were previously being caught but thrown back into the sea and so should now be expected to be landed.

29. ClientEarth have suggested that an EU-wide indicator should be developed "to allow the tracking of selectivity improvements over the years".[45] They hope that this would encourage improvements in the selectivity of fishing gear, but could also provide evidence of the extent to which selectivity improvements can explain the lack of undersized fish being landed.

30. **The landing obligation was expected to result in an increased volume of undersized fish being brought to shore. This has not happened, but it is unclear whether this is due to improvements in fishing gear that allow fishers to avoid catching these fish, or whether fishers are ignoring the landing obligation and continuing to discard them.**

31. **We welcome the improvement in selective gear technology, and would strongly encourage its continued development and take-up. Given the importance of more selective fishing, the Government and devolved administrations must urgently consider how they can track the extent of selectivity improvements in the UK fleet, including monitoring the sales of selective fishing gear, and work with other Member States to develop an EU-wide indicator**.

32. **The lack of historic data on discards means the UK has no baseline against which to judge the impact of the landing obligation. The UK Government and devolved administrations should urgently consider how they will improve catch data, to enable them to monitor future progress.**

Is the landing obligation being complied with?

33. The modest impact of the landing obligation to date raises questions about the level of compliance.

34. ClientEarth, the Marine Conservation Society and WWF told us: "Acknowledgement of this continuing practice [of discarding] has been identified by all stakeholders from the fishing industry themselves, to scientists, researchers, eNGOs and independent researchers."[46] While the SWFPO told us that "compliance with the Discards Landing Obligation is high",[47] Barrie Deas said: "At this stage, five months into the landing obligation, my assessment would be that it is patchy, it is difficult to know and it is probably uneven."[48]

35. When we asked Marine Scotland about the extent to which they thought the landing obligation was being complied with, they told us: "We are unable to answer this question as we could only provide an estimate based on the cases of non-compliance identified and anything beyond that would be guesswork."[49] They told us there had been one detection of non-compliance since the landing obligation came fully into force.[50]

---

45 Written evidence from ClientEarth (IEL0027)
46 Written evidence from ClientEarth, the Marine Conservation Society and WWF (IEL0025)
47 Written evidence from the South West Fish Producers Organisation Ltd (IEL0024)
48 Q 65
49 Written evidence from Marine Scotland (IEL0023)
50 *Ibid.*

36. Phil Haslam also did not know what the rate of compliance was, describing it as "an emerging picture".[51] He noted, however, that in England and Wales:

> "There have been 93 inspections to date. Within those, there have been 57 issues in terms of the demersal landing obligation—not infringements, but issues that have needed correcting … A lot of it has just been misunderstandings in terms of exemptions, about what should be retained and what can be put back."[52]

37. The Fisheries Minister mentioned several times that he believed discarding was still taking place.[53] He told us: "I cannot say, hand on heart, that [the landing obligation] is being fully complied with."[54]

38. **Given the important ecological reasons for the introduction of the landing obligation, it is concerning both that the Government believes illegal discarding is still taking place and that it does not know the extent of compliance.**

39. **The Government and devolved administrations must urgently take steps to put robust mechanisms in place to monitor and enforce compliance. We also urge the Government to seek to persuade the Commission and Member States to agree measures to improve monitoring and compliance across the EU.**

51 Q 79
52 Q 76
53 QQ 89–90
54 Q 92

CHAPTER 3: MONITORING AND ENFORCEMENT

The enforcement challenge

40. In our previous report, we concluded: "On the eve of the landing obligation fully coming into force, the UK appeared entirely unprepared to monitor or enforce compliance."[55] This conclusion has been borne out in this follow-up inquiry. As Pete Bromley told us: "At the moment, we are working with an honesty box system … There is nobody checking."[56]

41. ClientEarth, the Marine Conservation Society and WWF reminded us why the ability to effectively monitor compliance is so important: "With little being done to monitor or enforce the landing obligation, the fishing industry has no incentive to curb the harmful practice of discarding fish to the detriment of the marine environment upon which they are reliant."[57]

42. The agencies responsible for enforcing the landing obligation in England and Scotland explained the various steps that they were taking. Marine Scotland told us: "Compliance officers operate a rigorous enforcement regime using an intelligence led risk based approach and using a range of tools including at-sea monitoring via our Compliance vessels and onshore monitoring including the presence of compliance officers on the quayside and within the marketplace."[58]

43. Phil Haslam told us: "We have increased our inspection routines … We are making greater use of aerial surveillance … We are using other things such as last haul analysis, where we board a vessel … and reverse engineer what you could expect to see for retained catch."[59] He told us he currently has access to three patrol vessels, which he accepted was "very few".[60]

44. He acknowledged, however, the significant flaws of each of the tools available to him. He told us: "If I put a patrol vessel among a fleet, the likelihood is that it will be very compliant at the time";[61] that the footage from the aerial surveillance was not detailed enough to prove noncompliance;[62] and that "poor data recording is at the moment impacting our ability to do thorough data analysis".[63] Asked if there was the ability to catch a fisher discarding, he replied: "It is going to be tricky."[64]

45. Asked whether drones are being used for monitoring and enforcement, Phil Haslam told us: "A lot of work is going on with drones in the marine space to see how we can introduce that capability, but it is not straightforward."[65] He explained: "For a drone that has the endurance and loiter capability to do the work that we need to do, and the coverage and the ability to be

55 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276), para 141
56 Q 72
57 Written evidence from ClientEarth, the Marine Conservation Society and WWF (IEL0025)
58 Written evidence from Marine Scotland (IEL0023)
59 Q 75
60 Q 77
61 *Ibid.*
62 Q 75
63 *Ibid.*
64 Q 76
65 Q 75

controlled, it quickly escalates up the scale of expense."[66] We would note that as technology develops, however, this may become a viable solution.

46. Barrie Deas summarised the problem: "The challenge is to monitor behaviour on board fishing vessels day and night, 24 hours, wherever they are and whatever the class of vessel. If you want a complete picture, that is the challenge, and it is big."[67]

47. **Enforcement agencies are taking a range of actions in an attempt to monitor compliance with the landing obligation. None of the currently used mechanisms, however, are sufficient to determine levels of non-compliance or to provide sufficient evidence for enforcement action. This challenge is compounded by a lack of data.**

48. **Monitoring at sea was a known challenge of the landing obligation and, as we stated in our previous report, it is extremely disappointing that effective monitoring mechanisms were not in place from 'day one' of the rules coming fully into force, given that the Regulation was agreed six years ago.**

Remote electronic monitoring

49. In our previous report we explored the use of remote electronic monitoring (REM), which typically combines CCTV cameras to record fishing activity, GPS receivers to track fishing locations and sensors to monitor fishing gear usage, in detail. We concluded that "REM was "the only practical and effective way to monitor compliance with the landing obligation".[68]

50. In the present inquiry the World Wildlife Fund (WWF) described REM as "technology that is widely available, cost effective and able to provide evidence of compliance … [and] accurate data on what is happening in our fisheries."[69] Barrie Deas told us it was already being used by fishers in British Columbia;[70] it is also used in New Zealand, the United States of America and a number of other countries.[71] WWF stated: "It is difficult to understand, given the threat posed by potential widescale non-compliance to our stocks, and in turn the businesses reliant on them, why UK administrations appear unwilling to introduce REM across UK fleets."[72]

51. Both the Scottish and UK administrations acknowledge the benefits of REM. Marine Scotland told us: "We believe that the proportionate use of Remote Electronic Monitoring (REM) would help with future enforcement of the landing obligation."[73] The Minister agreed: "To actually bring a prosecution you need to be able to see exactly what is happening on board, and REM gives you that particular opportunity."[74]

52. Nevertheless, neither administration is prepared to require its fleets to use REM until other Member States place a similar requirement on their fleets.

---

66 Q 75
67 Q 69
68 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276), para 127
69 Written evidence from World Wildlife Fund (IEL0022)
70 Q 69
71 Oral evidence taken on 5 December 2018 (Session 2017–19), Q 33 (Helen McLachlan)
72 Written evidence from World Wildlife Fund (IEL0022)
73 Written evidence from Marine Scotland (IEL0023)
74 Q 94

The Fisheries Minister restated this position: "We must not impose it on our UK boats and create an unlevel playing field with other EU vessels that do not have to have the same technology installed."[75]

53. Although EU-level discussions are taking place on the use of REM, progress appears slow. The Minister told us:

> "A number of Member States are not as keen as we are to try to introduce it in an ordered way. Some countries raise data protection issues; others just see it as another measure that might restrict their national fleets … the UK has been keen to push for better monitoring to enable us to ensure that the landing obligation works better, and we have been frustrated to an extent."[76]

54. **We remain of the view that remote electronic monitoring is the only way to monitor compliance with the landing obligation, and restate our disappointment that Member States did not use the lengthy phasing-in of the landing obligation to agree on its use across the EU.**

55. The Minister told us that "after we have left the European Union … as a condition of fishing in our waters, we would be able to ensure that the same requirements are placed on EU vessels in our waters",[77] and that these requirements could include the use of REM. He cautioned, however, that this would be subject to negotiations with the EU, and that a desire to control access to UK waters and impose restrictions on EU vessels would need to be tempered with a "need to consider our markets, because the majority of fish caught in our waters is marketed in the EU".[78]

56. **It may be contentious for the UK to insist on the universal use of remote electronic monitoring as a condition of fishing in its waters post-Brexit. Nevertheless, we believe that the UK should commit to mandating the use of remote electronic monitoring on all vessels fishing in UK waters after it leaves the EU.**

57. In our previous report, we noted that pressure from retailers could result in fishers wanting to be able to demonstrate compliance. Tesco told us:

> "If the regulation is not strictly followed and there is no effective enforcement there will be Illegal, Unreported and Unregulated (IUU) fishing happening in UK waters and by UK vessels with illegally caught fish entering UK and other supply chains. This risk would ultimately sit with retailers and leave them exposed in the knowledge that IUU fish may be entering their supply chains."[79]

The UK Seafood Alliance agreed: "We therefore have a need to assure that the fishermen that supply us are complying with the regulations."[80]

58. **The fishing industry does not, as yet, seem to have come under pressure from their buyers to prove compliance with the landing**

---

75 Q 93
76 Q 88
77 Q 94
78 *Ibid.*
79 Written evidence from Tesco (IEL0016)
80 Written evidence from the UK Seafood Industry Alliance (IEL0013)

obligation. If and when this happens, however, it could provide a driver for fishers to adopt remote electronic monitoring voluntarily.

Compulsory compliance

59. Asked when he thought the landing obligation's aim, to eliminate discarding, would be achieved, Phil Haslam told us: "When the cultural shift has been made and there is recognition that compliance with these regulations is possible and is adding value to business models."[81] Pete Bromley agreed that "fishermen need to want to comply",[82] and Barrie Deas told us: "The people on the boats need to want to do this to demonstrate their compliance, for some incentive, whether it is quota, or to be able to sell their fish in the market, or a price premium."[83]

60. The Minister agreed: "It is about better communication, and looking at incentives … which ensure that people see a benefit in complying with the landing obligation."[84]

61. **We are concerned that many of our witnesses, including the Minister, feel the fishing industry will need to be given incentives in order to comply with the landing obligation. While we would support a communication campaign that emphasises to fishers the benefits of compliance, it is a legal requirement that fish stocks subject to the landing obligation are not discarded. Incentivising fishers by offering rewards to those that comply could lead to the inappropriate conclusion that compliance is voluntary.**

81 Q 80
82 Q 72
83 Q 68
84 Q 92

CHAPTER 4: THE RISK OF OVERFISHING

An assumption of compliance

62. In order to prevent overfishing, vessels have a maximum quota for different fish stocks that they can land. Quota is allocated to each Member State based on the 'total allowable catch' (TAC) agreed for a stock, which is set based on scientific advice on the health of that stock and the maximum level at which it can be fished sustainably.[85]

63. ClientEarth, the Marine Conservation Society and WWF told us:

> "In previous years management authorities would remove the amount that they considered would be discarded … On that basis, if it was estimated that the discard rate for a species was 20% then the fleet would be allocated 80% of the recommended quota to land (with the assumption that the other 20% would be discarded)."[86]

Because, under the landing obligation, all fish should now be landed, additional quota has been granted to take account of the fish that would previously been discarded.

64. ClientEarth, the Marine Conservation Society and WWF expressed their concern about this:

> "Basing such adjustments (quota uplift or 'top-ups') on an assumption of perfect compliance (which is unlikely) runs the risk of … overfishing. This is especially the case where catches are not fully monitored … We therefore remain of the view that the UK Government must ensure that any quota uplift made available to UK fleets is only granted to those that can clearly account for that quota, demonstrate compliance with the landing obligation, and that efforts to reduce unwanted catches, such as the application of best practice selectivity and avoidance, are being made wherever possible."[87]

65. The issue is further complicated by the fact that, for some stocks, exemptions have been granted that allow fishers to continue to discard some fish (see below, paragraphs 70–71). An analysis by the Pew Charitable Trusts (PCT) has found that not all catch limits appear to have been adjusted to account for exemptions.[88] If this is the case, even if fishers are entirely compliant with the landing obligation, the combination of fish landed and discarded would exceed the maximum level that can be caught without damaging fish stocks.

66. ClientEarth raised similar concerns, telling us that the Regulation "does not specify which deductions have been applied and the information provided by the Commission so far regarding the underlying calculations do not provide an in-depth explanation of the data used".[89]

---

85 For more detail see European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276), Box 3.

86 Written evidence from ClientEarth, the Marine Conservation Society and WWF (IEL0026)

87 Written evidence from ClientEarth, the Marine Conservation Society and WWF (IEL0025)

88 The Pew Charitable Trusts, *Analysis of Fisheries Council agreement on fishing opportunities in the north-east Atlantic for 2019* (March 2019): https://www.pewtrusts.org/-/media/assets/2019/03/analysis-of-fisheries-council-agreement-on-fishing-opportunities-in-the-north-east-atlantic-for-2019.pdf?la=en&hash=D3806AA0BBB451B3A113F0E0592B01AFC47A3815 [accessed 12 June 2019]

89 Written evidence from ClientEarth (IEL0027)

67. Nigel Gooding told us: "If you are allowed to discard some quota under a *de minimis* exemption, the TAC is reduced accordingly."[90] It was not clear, however, whether total allowable catches (TACs) had been adjusted to account for other types of exemptions, such as 'high survivability' (see below, paragraph 71).

68. **Limits are set on the amount of each type of fish that fishers can catch, to ensure the health of fish stocks for future years. The EU's limits are now set on an assumption of 100% compliance with the landing obligation, making the need for an effective mechanism to monitor compliance even more pressing.**

69. **It is critical that the catch limits set reflect any exemptions that allow for continued discarding, and that information about how limits are calculated is easily, publicly available to allow for sufficient scrutiny. We urge the Government to raise these concerns with the European Commission.**

Exemptions

70. The landing obligation applies to "all catches … of species which are subject to catch limits and, in the Mediterranean Sea, also catches of species which are subject to minimum sizes".[91] Non-quota species are exempt, including most commercial shellfish species. Barrie Deas told us that in some fisheries "up to 70% of the catch can be non-quota species and therefore not subject to the landing obligation".[92]

71. The EU Fisheries Council agreed a number of additional exemptions to the landing obligation in December 2018. The Regulation allows for exemptions to be granted for species for which scientific evidence demonstrates high survival rates. It also allows for *'de minimis'* exemptions, where a certain percentage of the catch can be discarded if scientific evidence indicates that increases in selectivity are very difficult to achieve, or to avoid disproportionate costs of handling unwanted catches.[93]

72. As mentioned in Chapter 2, some witnesses told us that the exemptions agreed in December were the reason that vessels have not, so far, been 'choked'. Barrie Deas told us that exemptions were necessary for the landing obligation to function, adding that they would "be needed for quite a long time".[94] Bertie Armstrong agreed.[95]

73. ClientEarth, however, were concerned that "exemptions could diminish the overall objectives of the Landing Obligation".[96] We expressed a similar concern in our previous report.[97] Barrie Deas gave an example that appears to bear out this concern: "From memory, North Sea plaice and dab represented something like 75% of the discards in the European fleet … Both of them

90 Q 91
91 Council Regulation (EU) No 1380/2013 on the Common Fisheries Policy (OJ L 354/22, 28 December 2013)
92 Q 65
93 Council Regulation (EU) No 1380/2013 on the Common Fisheries Policy (OJ L 354/22, 28 December 2013)
94 Q 70
95 *Ibid.*
96 Written evidence from ClientEarth (IEL0027)
97 European Union Committee, *Fisheries: Implementation and Enforcement of the Landing Obligation* (26th Report, Session 2017–19, HL Paper 276), para 78

will continue to be discarded."[98] He explained that "the Commission had removed the TAC for dab and there is high survival exemption for plaice".[99]

74. Nigel Gooding told us: "We do not want a huge number of exemptions … We have been very careful, from the UK's perspective, not to ensure that there are exemptions for absolutely everything and that the standards are kept as high as possible."[100]

75. **The aim of the landing obligation is to eliminate discarding. Although we recognise that exemptions have helped reduce the risk of choke, we remain concerned that their scale undermines this overriding aim, and we therefore urge the Government to work with other Member States to continually challenge and reduce the use of exemptions.**

76. Witnesses raised particular concerns about the agreement at the December Fisheries Council to set catch limits for five stocks for which scientific advice was for a zero catch. Zero catches are recommended when the state of a fish stock is particularly poor. To enable fishers to continue to fish for other species in the same waters as these stocks, however, the European Commission proposed a quota for 'bycatch', to allow for the fact that some of the zero catch stock might be caught accidently. Environmental groups argued this would only be acceptable if it was accompanied by a requirement for the fleets in question to have remote electronic monitoring or observers on board,[101] but Member States rejected this. WWF described this decision as "unacceptable".[102]

77. Member States did agree, however, that 'bycatch reduction plans' should be developed. As the PCT explained in its March 2019 report, Ministers "agreed clear timelines for the development of these plans, and that they should include measures to minimise bycatches and ensure that all catches are subject to full catch documentation".[103] These plans were supposed to be submitted to the European Commission by 30 April, but when Nigel Gooding gave evidence on 5 June he told us the joint plan for North Western Waters had been "submitted last week, I think, or at the beginning of this week".[104] He also explained that it would be some time before the plans would be implemented: "They will now go to the European Commission and will be examined by the Scientific, Technical and Economic Committee for Fisheries, which will give their view of the recommendations … If it is approved, it will be adopted as part of the delegated Act and will apply for next year."[105]

---

98 Q 64
99 *Ibid.*
100 Q 90
101 See, for example, written evidence from the World Wildlife Fund (IEL0022) and the joint NGO position paper *Recovering fish stocks and fully implementing the Landing Obligation: Managing fishing mortality to meet CFP objectives:* http://image.pewtrusts.org/lib/fe8215737d630c747c/m/1/NGO+Position+Recovering+fish+stocks+and+fully+implementing+the+Landing+Obligation.pdf [accessed 15 June 2019].
102 Written evidence from the World Wildlife Fund (IEL0022)
103 The Pew Charitable Trusts, *Analysis of Fisheries Council agreement on fishing opportunities in the north-east Atlantic for 2019* (March 2019): https://www.pewtrusts.org/-/media/assets/2019/03/analysis-of-fisheries-council-agreement-on-fishing-opportunities-in-the-north-east-atlantic-for-2019.pdf?la=en&hash=D3806AA0BBB451B3A113F0E0592B01AFC47A3815 [accessed 12 June 2019]
104 Q 91
105 *Ibid.*

78. Not surprisingly, concerns have been raised about the time being taken to put these plans in place. ClientEarth told us:

> "We are very concerned about the prospect of business continuing as usual in the absence of strong, concrete and immediate measures as part of this bycatch reduction plan, allowing the dire state of these stocks to remain unchanged or even deteriorate further, since the bycatch TACs exceed scientifically advised levels."[106]

The PCT stated in their report that "the 'bycatch TACs' should only be made available once the evaluated plans are implemented".[107]

79. ClientEarth also raised concerns about the robustness of the plans:

> "The draft version of the plan we received via the NWWAC [North Western Waters Advisory Council] on 5th April appears to primarily contain references to measures already included in the current discard plan, or agreed as part of the new Technical Measures Framework. A more recent update of this draft plan received through the NWWAC on 15th May contains a limited number of additional measures, most of which remain rather vague and/or are not due to come into force until 2020."[108]

80. When we asked Nigel Gooding if the bycatch reduction plans would include a requirement for vessels allocated the bycatch quota to use remote electronic monitoring, he told us: "That is not part of the plans."[109]

81. **Allocating a small amount of quota to cover accidental bycatch of stocks that would otherwise have a zero catch limit may be a necessary measure. But given the imperative that the catch of these stocks be kept to an absolute minimum, we share the disappointment expressed by some of our witnesses that robust bycatch reduction plans were not in place before the landing obligation came fully into force.**

82. **The Government should work with other Member States and the European Commission to ensure bycatch reduction plans are implemented as quickly as possible. These plans should include a requirement for remote electronic monitoring and the use of more selective fishing gears on vessels allocated the bycatch quota, to ensure strict compliance with the quota limits and whatever bycatch reduction measures are agreed.**

The importance of scientific advice

83. This Committee has consistently stressed the importance of setting total allowable catches in line with scientific advice.[110] While there has always

106 Written evidence from ClientEarth (IEL0027)

107 The Pew Charitable Trusts, *Analysis of Fisheries Council agreement on fishing opportunities in the north-east Atlantic for 2019* (March 2019): https://www.pewtrusts.org/-/media/assets/2019/03/analysis-of-fisheries-council-agreement-on-fishing-opportunities-in-the-north-east-atlantic-for-2019.pdf?la=en&hash=D3806AA0BBB451B3A113F0E0592B01AFC47A3815 [accessed 12 June 2019]

108 Written evidence from ClientEarth (IEL0027)

109 Q 91

110 See, for example, the Committee's scrutiny of the EU Commission's Proposal for a Regulation on the Fishing Opportunities for 2019: https://www.parliament.uk/business/committees/committees-a-z/lords-select/eu-energy-environment-subcommittee/scrutiny-work/parliament-2017/fishing-opportunities-2019/.

been a tension between the ecological imperative to restrain fishing activity to a sustainable level and the short-term economic benefit of allowing the fishing industry to catch as much as possible, the additional risk of 'choke' created by the landing obligation could provide a further incentive to exceed the scientifically advised limits.

84. Phil Haslam told us that "the exemptions in place now have been based on pretty rigorous science",[111] a view shared by Marine Scotland.[112] Nigel Gooding told us:

> "Before any exemption is accepted, it … has to be examined and approved by the EU Scientific, Technical and Economic Committee for Fisheries, which is the EU's science committee. They can reject an exemption if they feel there is not enough science and evidence behind it. They can ask for more evidence, or they can say that the exemption will be allowed for only one year and the Member States then have to build up the evidence. There is quite a rigorous process."[113]

85. The Fisheries Minister, however, was clear that he did not believe scientific advice always has to be followed: "The science is important, but we also need to ensure that we have a sustainable industry in coastal resorts."[114] He continued:

> "It is a calculated risk, and it is a political decision … during discussions at Fisheries Council in December, in the horse trading that goes on, sometimes compromises have to be struck … You could take the purist position that, acting solely on the scientific advice, you might have to close a large number of fisheries. That would have a devastating effect on the communities supported by that and so sometimes we might have to curb our ambitions slightly."[115]

86. **This Committee wishes to see fishers and fishing communities flourish. If fishing is permitted above the maximum level that scientific advice states is sustainable, however, the long-term damage to fish stocks could pose a serious threat to the fishing industry.**

87. **We therefore restate our position that catch limits, and exemptions to the landing obligation, should be set in line with scientific advice and urge the Government to work with other Member States to accelerate progress in this area.**

111 Q 83
112 Written evidence from Marine Scotland (IEL0023)
113 Q 90
114 *Ibid.*
115 Q 91

SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

The impact of the landing obligation

1. The landing obligation, which to a large extent prohibits the previously common practice of discarding fish at sea, is both a significant change and a significant challenge for the fishing industry. Despite this, the new rules seem to have had little impact since they came into force in full six months ago. (Paragraph 8)

2. Given the widespread expectation that the landing obligation would result in vessels having to stop fishing within the first few months of this year, we were surprised to note that there appear to have been no instances of such 'choke' to-date. (Paragraph 13)

3. The consensus among witnesses was that swapping and trading quota, both within the UK and between Member States, will be key to preventing chokes occurring later in the year. (Paragraph 19)

4. There are concerns, however, that there is a greater reluctance to swap quota this year, causing the value of quota to rise and increasing the risk that it will be unobtainable by those who need it. (Paragraph 20)

5. We therefore restate the recommendation of our previous report that the Government should work with the devolved administrations to put formal mechanisms in place to avoid vessels choking where there is sufficient quota available elsewhere in the UK, and to make the case to the European Commission for a similar mechanism at EU level. This should include specific consideration of the constraints experienced by the under ten metre fleet. (Paragraph 21)

6. The landing obligation was expected to result in an increased volume of undersized fish being brought to shore. This has not happened, but it is unclear whether this is due to improvements in fishing gear that allow fishers to avoid catching these fish, or whether fishers are ignoring the landing obligation and continuing to discard them. (Paragraph 30)

7. We welcome the improvement in selective gear technology, and would strongly encourage its continued development and take-up. Given the importance of more selective fishing, the Government and devolved administrations must urgently consider how they can track the extent of selectivity improvements in the UK fleet, including monitoring the sales of selective fishing gear, and work with other Member States to develop an EU-wide indicator (Paragraph 31)

8. The lack of historic data on discards means the UK has no baseline against which to judge the impact of the landing obligation. The UK Government and devolved administrations should urgently consider how they will improve catch data, to enable them to monitor future progress. (Paragraph 32)

9. Given the important ecological reasons for the introduction of the landing obligation, it is concerning both that the Government believes illegal discarding is still taking place and that it does not know the extent of compliance. (Paragraph 38)

10. The Government and devolved administrations must urgently take steps to put robust mechanisms in place to monitor and enforce compliance. We

also urge the Government to seek to persuade the Commission and Member States to agree measures to improve monitoring and compliance across the EU. (Paragraph 39)

Monitoring and enforcement

11. Enforcement agencies are taking a range of actions in an attempt to monitor compliance with the landing obligation. None of the currently used mechanisms, however, are sufficient to determine levels of non-compliance or to provide sufficient evidence for enforcement action. This challenge is compounded by a lack of data. (Paragraph 47)

12. Monitoring at sea was a known challenge of the landing obligation and, as we stated in our previous report, it is extremely disappointing that effective monitoring mechanisms were not in place from 'day one' of the rules coming fully into force, given that the Regulation was agreed six years ago. (Paragraph 48)

13. We remain of the view that remote electronic monitoring is the only way to monitor compliance with the landing obligation, and restate our disappointment that Member States did not use the lengthy phasing-in of the landing obligation to agree on its use across the EU. (Paragraph 54)

14. It may be contentious for the UK to insist on the universal use of remote electronic monitoring as a condition of fishing in its waters post-Brexit. Nevertheless, we believe that the UK should commit to mandating the use of remote electronic monitoring on all vessels fishing in UK waters after it leaves the EU. (Paragraph 56)

15. The fishing industry does not, as yet, seem to have come under pressure from their buyers to prove compliance with the landing obligation. If and when this happens, however, it could provide a driver for fishers to adopt remote electronic monitoring voluntarily. (Paragraph 58)

16. We are concerned that many of our witnesses, including the Minister, feel the fishing industry will need to be given incentives in order to comply with the landing obligation. While we would support a communication campaign that emphasises to fishers the benefits of compliance, it is a legal requirement that fish stocks subject to the landing obligation are not discarded. Incentivising fishers by offering rewards to those that comply could lead to the inappropriate conclusion that compliance is voluntary. (Paragraph 61)

The risk of overfishing

17. Limits are set on the amount of each type of fish that fishers can catch, to ensure the health of fish stocks for future years. The EU's limits are now set on an assumption of 100% compliance with the landing obligation, making the need for an effective mechanism to monitor compliance even more pressing. (Paragraph 68)

18. It is critical that the catch limits set reflect any exemptions that allow for continued discarding, and that information about how limits are calculated is easily, publicly available to allow for sufficient scrutiny. We urge the Government to raise these concerns with the European Commission. (Paragraph 69)

19. The aim of the landing obligation is to eliminate discarding. Although we recognise that exemptions have helped reduce the risk of choke, we remain concerned that their scale undermines this overriding aim, and we therefore urge the Government to work with other Member States to continually challenge and reduce the use of exemptions. (Paragraph 75)

20. Allocating a small amount of quota to cover accidental bycatch of stocks that would otherwise have a zero catch limit may be a necessary measure. But given the imperative that the catch of these stocks be kept to an absolute minimum, we share the disappointment expressed by some of our witnesses that robust bycatch reduction plans were not in place before the landing obligation came fully into force. (Paragraph 81)

21. The Government should work with other Member States and the European Commission to ensure bycatch reduction plans are implemented as quickly as possible. These plans should include a requirement for remote electronic monitoring and the use of more selective fishing gears on vessels allocated the bycatch quota, to ensure strict compliance with the quota limits and whatever bycatch reduction measures are agreed. (Paragraph 82)

22. This Committee wishes to see fishers and fishing communities flourish. If fishing is permitted above the maximum level that scientific advice states is sustainable, however, the long-term damage to fish stocks could pose a serious threat to the fishing industry. (Paragraph 86)

23. We therefore restate our position that catch limits, and exemptions to the landing obligation, should be set in line with scientific advice and urge the Government to work with other Member States to accelerate progress in this area. (Paragraph 87)

APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

Members

Lord Cameron of Dillington
Viscount Hanworth
Lord Krebs
The Duke of Montrose
Lord Rooker
Lord Selkirk of Douglas
Baroness Sheehan
The Earl of Stair
Lord Teverson (Chair)
Baroness Wilcox
Lord Young of Norwood Green

Declarations of interest

Lord Cameron of Dillington
No relevant interests to declare
Viscount Hanworth
No relevant interests to declare
Lord Krebs
Scientific Advisor to Marks and Spencer PLC and Tesco PLC
The Duke of Montrose
Ownership of some fresh water fishing, including salmon
Lord Rooker
No relevant interests to declare
Lord Selkirk of Douglas
As in the register of interests
Occasional fishing for mackerel
Baroness Sheehan
No relevant interests to declare
The Earl of Stair
Recreational sea fisherman (non-commercial)
Trustee, Galloway Fisheries Trust
Chair; Luce District Salmon Fishery Board
Lord Teverson (Chair)
Trustee, North Devonshire Biosphere Foundation
Baroness Wilcox
Patron, National Lobster Hatchery
Experimental fish breeding
Member, Fishmongers' Company
Lord Young of Norwood Green
No relevant interests to declare

The following Members of the European Union Select Committee attended the meeting at which the report was approved:

Lord Cavendish of Furness
Baroness Couttie
Baroness Falkner of Margravine

Lord Faulkner of Worcester
Lord Jay of Ewelme
Lord Kerr of Kinlochard
The Earl of Kinnoull
Baroness Neville-Rolfe
Baroness Primarolo
Lord Ricketts
Lord Teverson
Baroness Verma
Lord Wood of Anfield

During consideration of the report, none of the Members declared a relevant interest.

APPENDIX 2: LIST OF WITNESSES

Evidence is published online at https://www.parliament.uk/hlinquiry-implementation-enforcement-landing-obligation/ and available for inspection at the Parliamentary Archives (020 7219 3074).

Evidence received by the Committee is listed below in chronological order of oral evidence session and in alphabetical order. Those witnesses marked with ** gave both oral evidence and written evidence. Those marked with * gave oral evidence and did not submit any written evidence. All other witnesses submitted written evidence only.

Oral Evidence in chronological order

*	Bertie Armstrong, Chief Executive Officer, Scottish Fishermen's Federation	QQ 64–72
*	Pete Bromley, Harbour Master, Sutton Harbour; Member of British Ports Association's Fishing Ports Group	QQ 64–72
*	Barrie Deas, Chief Executive Officer, National Federation of Fishermen's Organisations	QQ 64–72
*	Jeremy Percy, Director, New Under Ten Fishermen's Association	QQ 64–72
*	Jim Pettipher, Chief Executive Officer, Coastal Producer Organisation	QQ 64–72
*	Phil Haslam, Director of Operations, Marine Management Organisation	QQ 73–87
*	Nigel Gooding, Deputy Director for EU Fisheries Policy and Negotiations, Department for Environment, Food and Rural Affairs	QQ 88–95
*	Robert Goodwill MP, Minister of State for Agriculture, Fisheries and Food, Department for Environment, Food and Rural Affairs	QQ 88–95

Alphabetical list of all witnesses

*	Bertie Armstrong, Chief Executive Officer, Scottish Fishermen's Federation (QQ 64–72)	
*	Pete Bromley, Harbour Master, Sutton Harbour; Member of British Ports Association's Fishing Ports Group (QQ 64–72)	
	ClientEarth	IEL0027
*	Barrie Deas, Chief Executive Officer, National Federation of Fishermen's Organisations (QQ 64–72)	
*	Defra (QQ 88–95)	
*	Phil Haslam, Director of Operations, Marine Management Organisation (QQ 73–87)	

	Marine Conservation Society, ClientEarth and WWF UK	IEL0025 IEL0026
	Marine Scotland	IEL0023
⋆	Jeremy Percy, Director, New Under Ten Fishermen's Association (QQ 64–72)	
⋆	Jim Pettipher, Chief Executive Officer, Coastal Producer Organisation (QQ 64–72)	
	South West Fish Producers Organisation	IEL0024
	WWF UK	IEL0022

APPENDIX 3: GLOSSARY

CCTV	Closed Circuit TV
eNGO	Environmental Non-Governmental Organisation
GPS	Global Positioning System
MMO	Marine Management Organisation
NFFO	National Federation of Fishermen's Organisations
PCT	Pew Charitable Trusts
REM	Remote Electronic Monitoring
SWFPO	South West Fish Producers Organisation
TAC	Total Allowable Catch
WWF	World Wildlife Fund