

Email to: inshore@gov.scot
Cc: jim.watson@gov.scot



07 November 2023

Inshore Fisheries Management
Marine Directorate
Scottish Government
Area 1B North, Victoria Quay
Edinburgh, EH6 6QQ

Dear James Watson,

Response to: Improving inshore fisheries data: consultation on requiring electronic tracking and monitoring technology on under 12 metre commercial fishing vessels (August 14, 2023)

Scottish Renewables is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 340 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe and worldwide, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

Scottish Renewables (SR) welcomes the opportunity to provide our view on improving inshore fisheries data to the Scottish Government's consultation on requiring electronic tracking and monitoring technology on under 12 metre commercial fishing vessels.

It is trusted that the concerns and matters of our members raised below will be fully considered. Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Mark Richardson".

Mark Richardson
Senior Policy Manager | Offshore Wind Enabling
mrichardson@scottishrenewables.com
Scottish Renewables

RESPONSE TO CONSULTATION QUESTIONS:

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/Disagree/Dont Know~~

The move to installing tracking equipment such as iVMS is a positive step towards improved fisheries management, giving the fisheries authority the ability to monitor vessel movements at a much higher resolution. This transparency will allow for more efficient management measures, prevent illegal fishing, and improve the sustainability of the marine environment.

From an offshore renewable energy perspective, the increase in data resolution for vessel activity can only be seen as a positive step, as it will allow improved planning and strategy when working with fishing industry stakeholders to reduce potential impacts of renewables operations. It will also better support the implementation of commercial fisheries coexistence plans and support an open dialogue between fisheries and offshore renewable energy, to ensure the potential impacts of offshore wind farms are truly understood.

It should be noted however the frequency of pings from any tracking device is an important factor in truly understanding the operational activity of any fleet segment, where the offshore renewable energy sector support the highest frequency of pings as possible. From a longer-term perspective, the data collected from REM would support Crown Estate Scotland's work regarding any future offshore wind leasing rounds.

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/Disagree/Dont Know~~

The move to improve monitoring control and surveillance should be seen as a positive step toward achieving sustainability and transparency. However, full REM systems can be seen as potentially invasive to the fishing industry therefore this approach should be considered via the view of the fishing industry. It should also be noted that the costs associated with this approach will also need to consider the time taken to review and audit REM data.

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.”

Agree/Disagree/Dont Know

Whilst our members agree with the parameters set out in Paragraph 16, as noted in the previous question full REM systems can be seen as potentially invasive to the fishing industry therefore this approach should be considered via the view of the fishing industry, including a robust framework for vessel selection. If approached correctly, we think that the benefits of implementation regarding marine spatial planning would outweigh any concerns that could be mitigated.

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?

- 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

Increased tracking and management have almost ubiquitous benefits (bar those that engage in IUU fishing efforts). Consideration must be made to how data will be made available to developers and the level of anonymity that will be afforded to fishers as the data is commercial in nature. It is therefore requested that the Scottish Government give consideration as to how data will be provided on the fishing vessel activity with respect to data confidentiality.

In the first instance, it would be expected that iVMS or REM data could be provided as an amalgamated data set at the c-square level to provide detail on fishing intensity by gear type, hours fished, value of catch and weight of catch (if correlated to logbook data) on a regular (i.e., preferably monthly) basis. Wherever possible, a more detailed dataset would be appreciated, as the more detailed the data, the more it would help developers with the placing of their infrastructure around fishing tracks. Consideration as to the scale of data provision would be helpful, ideally providing data both inside and beyond territorial waters (i.e., out to UK Exclusive Economic Zone (EEZ)).

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

Yes/No

We broadly agree with the assessment made within the BRIA; however, we recognise the cost incurred on the fishing industry. Given this, we are in support of the government providing additional support for operational costs where necessary.

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

Yes/No

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

Yes/No

END