

**The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group, and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.**

**Northern Ireland Marine Task Force response to:**

**[Consultation on requirement for vessel monitoring systems for under 12 metre fishing vessels.](#)**

Submitted 1<sup>st</sup> June 2022

**Consultation questions:**

**Q1. Do you agree with the proposal to require I-VMS on under 12m vessels? Yes / No / Unsure, please provide comments below in support of your view.**

The NIMTF welcomes the proposals to introduce I-VMS to NI's under 12 metre fishing vessels. Inshore I-VMS represents a positive step in improving the level of monitoring, scrutiny, and surveillance of the inshore fleet activities. We welcome the intention to use this information to inform fisheries management, marine protection and marine planning decisions. To date, a lack of sufficient monitoring of inshore fishing activity and the resulting need to apply the precautionary approach have been problematic in representing the fishing industry's interests and to those seeking to manage fisheries better and protect the marine environment.

The NIMTF agrees with selecting preferred Option 4 and with the prioritisation of larger vessels and those fishing within the vicinity of MPAs to be selected first in the phasing-in process.

**Q1A. If you are the owner of a registered fishing vessel under 12 metres and you answered yes to Question 1, please indicate whether you would prefer a bespoke Northern Ireland iVMS product from a single supplier or a "type-approved" product which might offer vessel owners a number of options to choose from?**

N/A

**Q2. What alternative approaches could be taken to achieve the same policy objectives for the introduction of vessel monitoring systems on under 12 metre fishing vessels?**

Whilst the NIMTF warmly welcomes and recognises the value in introducing I-VMS to the inshore NI fleet, we note that several additional technologies and mechanisms are available that would significantly contribute to the policy objectives, which aim '*to gain better information on fishing activity in the inshore region*' and to '*improve understanding of the location, volume and value of fishing activity of that fleet*'. We acknowledge that I-VMS rollout is a positive first step towards

increasing the information on the *location* of fishing activity but does not provide the most accurate information available on the *level* (i.e. effort) of fishing activity. Our view is that location alone, without an understanding of the level/type of activity during I-VMS activation, may represent a poor proxy for fishing effort overall. Therefore, we suggest that further additional measures be considered to represent the '*volume and value of fishing activity*' better. These may include considering a catch reporting mechanism, the introduction of a pot tagging scheme and the exploration of the viability of introducing Remote Electronic Monitoring (REM) with cameras.

Fully documented fisheries benefit fisheries managers, fishers and the marine environment. Combining a range of fisheries management tools such as I-VMS, mandatory catch recording (including protected species and incidences of entanglement and bycatch of sensitive species), a pot tagging scheme (including management of the recreational 5 pot limit) and exploring the use of Remote Electronic Monitoring with cameras can help deliver i) effective data collection to help manage stocks, ii) effective assessment and monitoring on the level of bycatch of sensitive species such as seabirds and marine mammals and iii) provide evidence to support accountability and confidence in the supply chain, including compliance.

Fishing fleets represent a rich source of comprehensive data on habitats and fish stocks. Ensuring sufficient data is available for all UK marine environments where fishing takes place must be a priority to achieve healthy and productive seas.

**Q3. What are your views on the costs and benefits as set out in the draft Regulatory Impact Assessment, do you agree with them? Yes / No, please provide comments below in support of your view.**

N/A

**Q5 (4). Are there any costs or benefits that have not been identified in the draft Regulatory Impact Assessment? What evidence do you have to support this?**

N/A

**Q6 (5). Are there any further comments you would like to make on the impact of the proposal?**

N/A

On behalf of NIMTF:  
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