The Brexit Textbook on Fisheries

Future policy for fishing to flourish within an independent United Kingdom

FISHING FOR **LEAVE**
SAVE BRITAIN'S FISH

The Brexit Textbook on Fisheries

FISHING FOR LEAVE

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Introduction

FUTURE MANAGEMENT CANNOT REPLICATE THE CFP

UK withdrawal from the EU provides a one and only golden opportunity to automatically repatriate one of the nation's greatest renewable resources.

Thereafter, the UK can implement a fit-for-purpose UK fisheries management policy that husbands this fantastic resource and its potential, and which benefits all fishermen and all communities.

There is little to be pessimistic about fisheries regarding UK withdrawal, with the level of resources repatriated being immense.

The UK Exclusive Economic Zone (EEZ) includes some of the most productive and prime aquatic real estate in the world, with the majority of EU catches (59%) being taken from what will be UK waters.

Sadly, these resources were surrendered and squandered to the EU, as they were bartered away as "expendable" by Edward Heath as a price for the United Kingdom joining the EU.

Tragically, due to our membership of the EU, for the past 40 years, these resources, and control over them have been managed as part of the EU political project with disastrous environmental, economic and social consequences. This situation was enshrined in the EU treaties and the Regulations derived from them.

The UK ceded control over our EEZ and its fisheries resources to the EU with the UK Treaty of Accession. This treaty accepted the EU Common Fisheries Policy (CFP).

The CFP resulted in UK waters and resources being opened to exploitation by every EU member state under the principle of 'equal access to a common resource', underpinned by Regulation 2141/70 and the non-discriminatory principle.

Thereafter, all fisheries resources were shared out to all member states under an EU quota system and relative stability shares, which are underpinned by Regulations 170/83.

“It must be understood that the tragic CFP is not a natural state of affairs and that other independent sovereign nations manage their fisheries within their Exclusive Economic Zone exclusively!”

With every succeeding treaty and regulation the noose of the CFP has tightened around the UK industry.

The deprivation of our own resources, and degradation of the marine environment through mis-management, has resulted in around, on average:

1. 75% of fisheries resources in the waters around the UK being held by other EU member states.
2. 59% of catches in UK waters, of the value in the region of around £711 million annually, are by EU vessels.
3. 60% of the UK fleet has been scrapped as a result of the deprivation of our own resources. Resultantly towns synonymous with fishing have been destroyed.

There are no major fishing ports left between Plymouth and Peterhead such has been the UK industries demise under EU membership and the Common Fisheries Policy (CFP).

Upon UK withdrawal, and the repeal of the European Communities Act 1972, under the term of Article 50, Section 3, the Treaties “shall cease to apply”.

Consequently, so too will the EU Regulations, and therefore the CFP and its terms of equal access, quotas and relative stability share outs. All of these will no longer be applicable upon British withdrawal.

The UK would see the automatic restoration of national control over the UK EEZ, out to 200 nautical miles/the median line, and all living marine resources therein as per the provisions of international law.

The United Kingdom will regain her exclusive rights, competence and control over all fisheries resources within the UK EEZ under the provisions of UNCLOS III.

Thereafter, it will be within the rights and sole discretion of Her Majesty’s Government to exercise management over these resources for the benefit of the nation and its fishing industry.

This represents a golden chance of a clean slate, with the UK being able to implement a replacement policy which provides decent, fit for purpose management. A policy that benefits the UK’s marine environment, the whole UK fishing industry along with all involved within the industry and the coastal communities that depend upon it.

“The Common Fisheries Policy (CFP) is universally recognised and derided as an abject environmental and ecological failure, even by the EU itself.”

The UK’s interests would best be served with the implementation of our own bespoke, fit-for-purpose management policy. A policy applicable and tailored to the unique demersal mixed fisheries around the UK. Ending EU quotas, which would stop the mass discarding they cause, along with the relative stability share outs of them.

The UK should transition to a Days-at-Sea policy for demersal mixed fisheries, which would end discards, allowing the industry to catch less but land more for greater profitability.

Transitioning to Days-at Sea would automatically end discards, end the regulatory morass of the quota regime, allowing and encouraging accurate reporting in contrast to the misreporting under quotas.

The new Days-at-Sea policy would incorporate and transition current track UK FQA entitlements into this system to provide business and investment stability.

> *"Future UK fishing policy must aim to rebuild a flourishing, stable, profitable, sustainable industry."*

British fishing has been decimated in the EU, however, UK fishing could flourish as a global leader like Faroe, Iceland and Norway. With the weight of landings increasing by 220%, with the value to the UK economy reaching approximately £6.3 billion annually.

This would reinvigorate coastal communities nationwide - boosting employment and lowering benefit dependency.

It is CRITICAL that for either political convenience, or a minority of vested industry interests, that the CFP is not replicated into British law with the Great "Repeal" Bill. Doing so would diplomatically squander the opportunity to make a clean break, and would see the UK enmeshed and continuing an ill-fitting regime that is causing consolidation of the industry through politics, not natural progression.

Therefore, it should be ensured that Fisheries are exempted from the Great "Repeal" Bill to ensure the CFP disaster is not replicated into British law.

Although many would rather not see exemptions from the Bill, fishing is an exceptional case due to it being a contentious resources and boundary dispute.

The British Fishing Industry, and the British people's resources, were betrayed once before in 1972 when sacrificed to join the then EEC.

The electorate are aware of that situation now and the Government must have the courage to allow automatic repatriation, as a repeat performance of betraying the nation's fisheries resources will not be tolerated a second time.

Fishing has come to epitomise and be a microcosm of the UK's enmeshment in the EU and its relentless drive towards ever closer union.

Therefore, whether the government regains control over the UKs fisheries will be an "acid test" of Brexit – fishing could be a beacon of success or a second great betrayal.

This government must be the first, for many years, to genuinely safeguard Britain's strategic interests and to safeguard our own resources for our own benefit. Not open them to competition from every nation, and watch our national wealth and infrastructure bleed away.

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Section One

Constitutional Conundrum?

"There must be a hidden agenda for the British fleet, they want us out, and the only way they want us out is we've one of the richest fishing grounds there is"

DAVY MILNE – BBC GUTTED DOCUMENTARY - 2003

"We could become the first island in the history of the world that doesn't even have a fishing industry… it's not about conservation, it's about accommodation of the Spanish and the European fleet… We're being sacrificed on the altar of Euro union"

ANONYMOUS – BBC GUTTED DOCUMENTARY - 2003

"The sacrifice of the fishing industry was the first betrayal of a significant national asset"

British whitefish vessels. Generations of heritage scrapped in Denmark

Legal procedure of withdrawal

Legal procedure to be free of the Common Fisheries Policy Outlined by the Prime Minister

At the commencement of the Conservative Party Conference on the 2nd. October 2016, the Prime Minister, the Rt. Hon. Theresa May clearly stated the plan and route Brexit would take.

Rt. Hon. Theresa May

> *"We will invoke Article Fifty no later than the end of March next year. The process of withdrawal is the most important."*

Article 50, Section 3 is the important part:

> *The Treaties shall cease to apply to the State in question from the date of entry into force of the withdrawal agreement or, failing that, two years after the notification referred to in paragraph 2, unless the European Council, in agreement with the Member State concerned, unanimously decides to extend this period.*

Irrespective of whether an agreement has been reached or not, at the end of two years, unless agreed otherwise, the EU Treaties shall cease to apply. As regulations take their authority from the Treaties, and the treaties cease to apply, so in turn do the regulations.
The Directives already work through Domestic Legislation, so they would have to be dealt with separately.
Subsequent to invoking Article 50, after the set negotiating time, the competency for Fisheries is automatically returned to the UK. The control of our territorial waters of 0 to 12 nautical miles and the Exclusive Economic Zone of 12 nautical miles to 200 nautical miles or median line zone, returns to the United Kingdom.

Rt. Hon. Theresa May

> *We will soon put before Parliament a Great Repeal Bill, which will remove from the statute book – once and for all the European Communities Act.*
> *This historic Bill – which will be included in the next Queen's Speech – will mean that the 1972 Act, the legislation that gives direct effect to all EU law in Britain, will no longer apply from the date upon which we formally leave the European Union. And its effect will be clear. Our laws will be made not in Brussels but in Westminster. The judges interpreting those laws will sit not in Luxembourg but in courts in this country. The authority of EU law in Britain will end.*

The repeal of the European Communities 1972 Act.

All EU legislation can only enter into the UK through the drawbridge of this Act. Upon repeal no further EU legislation can enter into UK legislation (see Section 1, page 9).

Invoking Article 50 and repealing the ECA 1972 results in being totally free of the Common Fisheries Policy as EU legislation "shall cease to apply". This removes with it EU Quotas, and the share out, of these EU Quotas, under Relative Stability shares, along with historic rights of access to the UK EEZ. The UK would revert to the Fishery Limits Act 1976, and its additions and amendments, which established the 200 nautical mile/median line zone, operating under the guide lines of UNCLOS 3 (United Nations Conference Law of the Sea) (see Section 2, page 3).

Rt. Hon. Theresa May

> *As we repeal the European Communities Act - we will convert the 'acquis' – that is, the body of existing EU law – into British law. When the Great Repeal Bill is given Royal Assent, Parliament will be free – subject to international agreements and treaties with other countries and the EU on matters such as trade to amend, repeal and improve any law it chooses.*

The Governments intention is to bring all EU legislation in operation up to repeal date into domestic legislation.

When Ireland gained independence in 1922 and India in 1947 they did exactly the same. This would allow time to carry out amendments, repeals and improvements to any of the transposed laws that Government/Parliament chooses.

However, fisheries is an exceptional case, as it is a territorial and resources dispute. By adopting the Common Fisheries Policy into UK law, it would negate the opportunity afforded under the terms of Article 50 to make a clean break by automatically repatriating all control over Fisheries and UK resources.

This would embroil the Government in an unnecessarily diplomatically difficult position as the Government would have to extricate itself from an adopted CFP or betray British fishing a second time.

The Acquis Communautaire

Comprehending the Acquis Communautaire is critical – it is the foundation block of the entire EU project.

It is critical to understand what the Acquis Communautaire is to comprehend how the European Union insidiously works, how EU law relates to Britain, how Britain is enmeshed in the EU and how we must extricate ourselves.

It is the Acquis Communautaire the government proposes to transpose, in its entirety, onto the UK statute book with the Great "Repeal" Bill.

As detailed earlier (see Section 1, page1) this was announced by Theresa May at the Conservative Party Conference in Birmingham on the 2nd of October 2016.

Rt. Hon. Theresa May

> *"... we will convert the 'acquis' – that is, the body of existing EU law – into British law. When the Great Repeal Bill is given Royal Assent."*

The Acquis Communautaire is the accumulated legislation, legal acts, and court decisions which constitute the body of European Union law. In short: it is all EU-law.

The term is French: acquis meaning "that which has been acquired or obtained", and communautaire meaning "of the community".

EU law (the Acquis Communautaire) consists of the founding Treaties (primary legislation) and the provisions of instruments enacted by the European institutions, by virtue of the Treaties, which are Regulations, Directives and decisions (secondary legislation). (1)

The Common Fisheries Policy is constructed entirely of Regulations and so is part of the Acquis Communautaire.

All member states and their citizens must obey the Acquis. Derogations from the Acquis are granted only in exceptional circumstances and are limited in scope. This is why the notion of renegotiation or reform was an odious sham – it is legally impossible without amending the Acquis. (2)

The complete body of the EU Acquis is composed of more than 108,000 documents.

The principle of the Acquis Communautaire is the primacy of EU law and all other principles developed by the Court of Justice.

The primacy of EU law over national law was explicitly declared in the rejected EU Constitution Article I-6 that was then repackaged as the Lisbon Treaty. Although the Article was deleted in the main body of the Lisbon Treaty it was surreptitiously inserted as a footnote, with the same content and with a specific reference to the Court verdicts establishing the primacy of EU law. It can be found in Declaration Number 17 attached to the Lisbon Treaty.

During the last process of the enlargement of the European Union, the Acquis Communautaire was divided into 35 chapters for the purpose of negotiation between the EU and the candidate member states. (3)

Within these chapters it clearly detailed Fisheries as one of the sections of the Acquis Communautaire – Chapter 13.

1. Free movement of goods
2. Freedom of movement for workers
3. Right of establishment and freedom to provide services
4. Free movement of capital
5. Public procurement
6. Company law
7. Intellectual property law
8. Competition policy
9. Financial services
10. Information society and media
11. Agriculture and rural development
12. Food safety, veterinary and phytosanitary policy
13. **Fisheries**
14. Transport policy
15. Energy
16. Taxation
17. Economic and monetary policy

Therefore, as clearly stated above the Acquis Communautaire is all EU law. This includes Regulations, and therefore the entire Common Fisheries Policy which is constructed of regulations. As confirmed above, the Acquis includes fisheries in the 35 Chapters.

Therefore, if the government adopts the Acquis Communautaire as proposed with the Great "Repeal" Bill (detailed overleaf) then the industry will still be in the CFP in all but name and bound by all the regulations that constitute the CFP.

Adopting the Acquis mean nothing at all would change for the fishing industry unless Parliament decided to Repeal the sections of the Acquis pertaining to fisheries.

If Scotland became independent and wished to re-join the EU, then Scotland would then have to accept and adopt the entire Acquis and would consequently become part of the CFP again, obeying all the parameters of the CFP including equal access and EU relative stability share outs.

1. http://eur-lex.europa.eu/summary/glossary/community_law.html?locale=en
2. http://eur-lex.europa.eu/summary/glossary/acquis.html
3. http://ec.europa.eu/neighbourhood-enlargement/policy/conditions-membership/chapters-of-the-acquis_en

Article 50 – Treaty on European Union (TEU)

Article 50 is the mechanism that allows the United Kingdom's rich fisheries resources to be automatically repatriated, whilst still fulfilling international treaty obligations, unless negated by the Great "Repeal" Bill.

The United Kingdom, will be the first country ever to invoke Article 50. Despite the term being extensively bandied about, there is little further analysis of the implications of this Article of the TEU.

Fortunately, for the UK, the terms of Article 50 are written in a very clear manner and are accepted and endorsed in full by all 27 Member States within the Lisbon Treaty. These terms were also endorsed a second time by all Members within the Accession Treaty of Croatia.

ARTICLE 50, SECTION 1
Any Member State may decide to withdraw from the Union in accordance with its own constitutional requirements.

What is being mis-interpreted and misconstrued to suggest otherwise is Section 2 of Article 50:

ARTICLE 50, SECTION 2

A Member State which decides to withdraw shall notify the European Council of its intention. In the light of the guidelines provided by the European Council, **the Union** shall negotiate and conclude an agreement with that State, setting out the arrangements for its withdrawal, taking account of the framework for its future relationship with the Union.

There is a line of thought that it is the responsibility of the UK to state her terms of leaving and establish a future relationship and an agreement where after the European Parliament and the Council of Ministers by qualified majority voting will agree or not.

Section 2 does not say that - it clearly states that it is **the Union** that shall be responsible to negotiate and conclude an agreement with the UK. If they do not then at the end of two year, or agreed extension period, the Treaties shall cease to apply to the UK regardless and the UK will be out of the EU.

This time limited termination date is very important and is highlighted by a precedent set in Fisheries with the Kent Kirk case in January 1983. This incident and case proved that when a Regulation terminates there is an automatic reversion to original law, in this case it was to the terms of Regulation 170/76 and the principle of equal access to all waters (see Section 1, page 8).

Regarding fisheries in the context of withdrawal, the important part of Article 50 is Section 3.

ARTICLE 50, SECTION 3

The Treaties shall cease to apply to the State in question from the date of entry into force of the withdrawal agreement or, failing that, two years after the notification referred to in paragraph 2, unless the European Council, in agreement with the Member State concerned, unanimously decides to extend this period.

Consequently, as clearly stated, after the two-year period from when the United Kingdom triggers Article 50, with the notification of intention to withdraw, unless a different time scale is agreed, "the Treaties shall cease to apply".

As the Regulations take their authority from the Treaties they too shall cease to apply and therefore the entire Common Fisheries Policy shall cease to apply at 1 second after the two years, or extended time- period, elapses.

> *"The UK will be out of the EU and all Treaties, Regulations and the CFP will cease to apply regardless of whether an agreement with the EU is reached or not."*

It is critical to understand that if no agreements are reached and established in the two-year time frame then the Treaties and Regulations, as stated, will still cease to apply to the Member State that invoked the Article.

This has significant and diplomatic implications–

1 The rest of the EU has agreed to this process. This gives the UK a strong position regarding international treaty law. The UK will not be "cutting and running" but simply fulfilling the terms as agreed in the Lisbon Treaty and TEU.

2 Fisheries are an exclusive competency; the CFP is constructed entirely of regulations. It is these regulations alone that have subsumed UK fisheries. As they shall cease to apply as per Article 50 total control and competency returns to the UK by default. There is nothing to negotiate with regards to fisheries and, as the EU agreed to this, there can be no dispute.

3 The British government has a supreme position of strength that it need only wait for British fisheries to return automatically as the UK reverts to being an independent nation under the terms of international law regarding fisheries - UNCLOS 3. The UK then need only enter any future fisheries arrangements or agreements at Her Majesty's Government discretion and only when of strategic advantage to our national fisheries interests.

4 As sovereignty and control returns to the UK, with nothing to negotiate in terms of obligations or extrication, it will only be within the power of Parliament to use, lose or betray the nation's fishing resources and coastal communities.

Adopting the fisheries Section of the Acquis Communautaire (as detailed in the next pages on the Great "Repeal" Bill) would negate this supreme position of diplomatic clarity and strength. The government must ensure, with regard to fisheries that Article 50 is allowed to run its course; that control and competency for fisheries does revert to the UK Parliament and that a clean break is made to allow no recourse for a dispute over fisheries.

Rt. Hon. Theresa May

> *"The authority of EU law in Britain will end"*

The government must take the clean slate afforded with Article 50 otherwise it is, in effect, supporting the disastrous CFP management system.

This, along with the two UK fishing Federations (NFFO and SFF) advocating a retention of the EU Quota system, would allow the EU recourse under international treaty law, the Vienna Convention on Treaties and Human rights legislation to retain the shares of UK resources it obtained under EU Treaties and Regulations.

This could create the predicament where British fishing is betrayed a second time by the current system being continued, albeit with different branding, and being run with an UK adopted CFP in a parallel system to the EU.

The Prime Minister stated in a speech at Conservative Party Conference that "The authority of EU law in Britain will end".

Implementing Article 50 and repealing the European Communities Act, returns full responsibility back to Parliament and Government – the opportunity to reclaim and rebuild British fishing can, after Article 50 is triggered, only be squandered and betrayed by Westminster MPs.

Kent Kirk Case - A legal precedent for Article 50

A case proving when a termination date is reached within an EU treaty or Regulation you immediately revert to the previous situation.

The UK's Accession Treaty included an exemption from the principle of "equal access without discrimination" to all Member States waters. This was granted as a 10 year derogation which allowed Member States to retain their 12 nautical mile limit exclusively for their fishing fleet.

This derogation expired on the 31st December 1982; however, the follow up derogation, which was to be included in Regulation 170/83, was not ready until the 25th January 1983. This meant there was a legal void of 26 days.

Danish skipper Kent Kirk realised this, and on the 6th January, 1983, sailed his Danish registered fishing vessel into the British 12 mile limit and commenced fishing north-east of Whitby.

He was promptly arrested and escorted into North Shields, charged with illegally entering British waters and found guilty under the UK law - Sea Fish (Specified UK Waters - Prohibition of Fishing) Order 1982, and fined £30,000.

Kent Kirk took his case to the European Court of Justice to prove that he was entitled to have been fishing within Britain's 12 nautical mile limit and that the UK Sea Fish Law was in contravention of EU Law. Kirk Kent won the case and the guilty verdict was overturned.

There are two very important points that this case proved.

Firstly, EU law takes precedence over UK law unless stipulated otherwise.

Secondly, when a termination date is reached within an EU treaty or Regulation, unless a follow up is in place to continue instantly, you immediately revert to the previous situation.

This proves and sets the legal precedent for Article 50 of the Lisbon Treaty. It shows that when the two years after invoking the Article, expires then, as per the terms of Article 50, the Treaties shall cease to apply.

Consequently, regardless of agreement, the UK will revert to what was there before. As the UK will be out with EU law, we will revert to international law, under UNCLOS 3, and the UK Fishery Limits Act 1976 which recognises the UK EEZ and the sovereign rights of the UK under UNCLOS 3 to control, manage and exploit all marine resources within the UK EEZ.

THE KENT KIRK CASE PROVES THREE THINGS

1. Through joining the EU, the government relinquished control of all sea fisheries around the UK coast to the EU.
2. Although the UK "retained" a 12 nautical mile limit, this was obtained as a temporary derogation from the principle of equal access up to the beaches and that had to be renewed on a 10 year basis at the behest of the EU.
3. When a Regulation or Treaty expires then there is a reversion to the previous situation.

http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:61983CJ0063&from=EN

European Communities Act 1972

European Communities Act of 1972, works as a portal for EU law to pass through and have authority within the UK- this is either through Regulations or Directives.

To leave the European Union the most important piece of UK legislation that needs to be repealed is the European Communities Act 1972 (ECA), which provides for the supremacy of EU law within the UK.

The European Communities Act of 1972 (The ECA 1972) is the legal basis for the implementation, application and jurisdiction of all EU law in the UK. The ECA 1972 allows EU instruments to become part of UK law without the need for ratification or input from Parliament.

The Act is a pipe that allows EU law to flow directly into and have authority over Britain. It is the European Communities Act that is the portal that allows EU law to take precedence over British law with Section 2(4)- that all UK legislation, including primary legislation (Acts of Parliament) have effect "subject to" directly applicable EU law.

Section 2(1) of the ECA gives the authority for Treaty provisions and **Regulations** to automatically have legal effect in the UK.

EUROPEAN COMMUNITIES ACT SECTION 2 (1)

All such rights, powers, liabilities, obligations and restrictions from time to time created or arising by or under the Treaties, and all such remedies and procedures from time to time provided for by or under the Treaties, as in accordance with the Treaties are without further enactment to be given legal effect or used in the United Kingdom shall be recognised and available in law, and be enforced, allowed and followed accordingly; and the expression "enforceable Community right" and similar expressions shall be read as referring to or to which this subsection applies.

EU legislation which is not directly applicable (e.g. directives and decisions) can be enacted either by primary legislation (Act of Parliament) or secondary legislation (Order, Statutory Instrument).

The vast majority of EC legislation is enacted by Statutory Instrument (SI) under Section 2(2) ECA. This Section confers authority on ministers, government departments or Her Majesty in Council to make, with certain exceptions contained in Schedule 2 of the Act, subordinate legislation.

When the Conservative government of the day passed the European Communities Act it allowed, for the first time ever, for a foreign body or power to have supremacy over the sovereign body of the British people – Parliament – this undermining of Parliamentary sovereignty was proved, incidentally in a legal case on fisheries – Factortame.

Repealing the ECA would bring an end to the constitutional relationship that exists between EU and UK law.

When the Act is repealed all EU laws (unless they have been transposed into British legislation with the Great "Repeal" Bill) would, in practice, become unenforceable in the United Kingdom, and the powers delegated by the Act to the EU institutions would return to the Parliament of the United Kingdom.

Resultantly, the entire Common Fisheries Policy will no longer be applicable, due to the Repeal of this Act and through the terms of Article 50 "the Treaties shall cease to apply".

The United Kingdom will need to develop a new independent fisheries policy to replace the defunct CFP.

This provides the unprecedented golden opportunity to implement a new independent British fisheries policy that is not only fit for purpose for the UK's unique marine ecology and highly mixed demersal fisheries but also a policy that is beneficial to all fishermen and communities.

The only way for this return of sovereignty, jurisdiction and chance of a fresh start to be squandered is if the Government, Parliament or MPs squander this legal situation by continuing or adopting EU fisheries Regulations into UK law.

European Communities Act in full - http://www.legislation.gov.uk/ukpga/1972/68/pdfs/ukpga_19720068_en.pdf

The Great Repeal Bill

HOUSE OF COMMONS

The Great "Repeal" Bill proposes the adoption of the entire Acquis Communautaire (the body of EU law) onto the UK statute book.

The Prime Minister's statement concerning UK withdrawal is of dire concern to the Fishing industry. The Great "Repeal" Bill, although repealing the 1972 European Communities Act, proposes the adoption of the entire Acquis Communautaire (the body of EU law) onto the UK statute book.

"By rolling the CFP into UK law we would have a continuation of all facets of the policy - in effect we would still be in the CFP in all but name."

If the Acquis Communautaire is adopted in full with the Great "Repeal" Bill then the entire CFP will have been transposed into British legislation. Rather than being imposed upon the United Kingdom directly through EU Regulations the Government will have adopted the disastrous CFP in its entirety.

Due to the CFP being constructed entirely of Regulations, UK withdrawal should represent a clean slate for fisheries and allow a new fit for purpose British fisheries policy to be implemented that is tailored to the Britain's unique marine ecology and mixed fisheries.

Adopting the CFP would squander, for political convenience, the golden opportunity to automatically repatriate, under the terms of Article 50, one of the nation's greatest renewable resources and rebuild UK fishing and communities.

The entire CFP is constructed of EU regulations and it is these Regulations that subverted British fisheries.

Regulation 2141/70 *gives other EU fishing vessels the right of equal access to fish UK waters as accepted in Article 100 of the UK's Treaty of Accession and recognises historic rights to do so (see Section 1, page 17).*

Regulation 101/76 *subsumed the UK's EEZ when created by Parliaments Fishery Limits Act 1976 (see Section 1, page 24).*

Regulation 170/83 *recognised the historic rights to fish UK waters and created an EU quota system with relative stability share outs which resulted in approximately 70% of fisheries resources in UK waters being held by other EU member states (see Section1, page 27).*

Article 50 – Section 3 of the TEU, as agreed by all member states, clearly says **'the treaties shall cease to apply'** upon withdrawal (see Section 1, page 5).

Resultantly, all Regulations that constitute the CFP would cease to apply. All control and resources would be automatically repatriated, as the UK would revert to international law as per UNCLOS 3.

It is critical to comprehend the significance of Article 50, Section 3. As the entire EU has agreed to "the treaties ceasing to apply" there can be no recourse to them under international treaty law and the Vienna convention on treaties to claim continuity of rights established.

However, by adopting and transposing All EU law of the Acquis Communautaire into UK legislation before Article 50 expires, the Government will have deliberately negated this opportunity of a clean break from the EU treaties.

By re-adopting the Acquis with the Great Repeal Bill, and the" terms and conditions" of the treaties, the UK will have created continuity and, in effect, re-acceded to the current rights and obligations.

The EU would then have recourse, under international treaty law and the Vienna Convention on treaties, to argue for continuity of rights acquired. Continuity the government will have provided by negating the clean break of Article 50.

Rather than having the strong diplomatic position of a clean break, and being free to manoeuver, the government will have nailed its feet to the floor by re-acceding to the terms and conditions of the Acquis.

By adopting the fisheries sections of the Acquis, the UK government would have endorsed, and given credence to the continuation of the CFP, along with Britain's adherence to all the mechanisms of this failed policy, with the fundamental inequities it imposes upon the British fishing industry.

Although the UK would be able to repeal the transposed terms of the CFP, the EU would argue that the government had acquiesced to continued continuity of the CFP by adopting it.

The UK would have locked itself into the continuation of the ecologically disastrous EU Quota regime and the mass discarding it causes. It would have acquiesced to the continuation of Relative Stability Share outs of this EU quota to other EU member states, allowing the EU to continue to take 60% of the British people's resource.

> *"Fisheries must not be sacrificed in the wider agenda for political convenience in unison with a minority of vested interests who would acquiesce to the status quo."*

This would be a worse position than before Brexit and would be diplomatic folly.

The government would be mired in a no win situation, of a battle to either remove EU fishermen from a policy that it had adopted, or face irate British fishermen and the public. In short this CFP roll over would be perceived as the second abject betrayal of Britain's resources.

It is conceivable that to avoid being contentious over fisheries the government would not fight for the repatriation of British fishing.

There is the danger that fisheries will be lower on the agenda than many other issues, with little parliamentary impetus to repeal fisheries regulations in the face of EU opposition. By the time the UK government could look to help UK fisheries there may be very little left to save.

> *"If the government really means to "take back control" with Brexit then there is no point in rolling CFP fisheries into UK law rather than exempt it."*

There is the huge danger that, with the current CFP management derogation due to be renewed in 2022, the UK could plausibly mirror all EU measures and run a concurrent policy to the EU to avoid politically inconvenient divergence.

Therefore, to be diplomatically and electorally astute, and the only way Brexit means Brexit, it is vital that the government exempts fisheries from the Great "Repeal" Bill.

If this does not happen then the industry will remain enmeshed in the CFP for years to come, continuing the decline.

The government will have diplomatically and electorally nailed its feet to the floor by adopting the CFP and squandered all negotiating capital by allowing the EU fishing industry to continue as is.

Fisheries must not be sacrificed in the wider agenda by retaining the status quo for political convenience and a minority of vested interests.

This would not be Brexit and would squander a golden chance to rejuvenate one of the nation's great renewable resources for all.

To take back all fisheries will be controversial. However Fishing for Leave hopes the government has the courage to do so and to hold this industry as a beacon that Brexit means Brexit.

HOUSE OF COMMONS


BREXIT
R480
R8
LEAVE
LEAVE
LEAVE

London Convention 1964


Fisheries Convention

An agreement to recognise historic rights of access to the waters of the UK for various other European nations.

The London Fisheries Convention of 1964 recognised historic rights of access to fish UK waters between 6 and 12 nautical miles for various European nations and came into force on 15th March 1966.

The Convention gives the contracting parties the right to terminate the agreement after 20 years by giving two years notice.

The London Convention was the start of Britain's rich fishing grounds being utilised as negotiating capital, setting the precedent that British fishing would be betrayed as "expendable" by Edward Heath when sacrificed to Brussels control in 1973 to join the EEC.

However, the Convention ONLY gives historic rights of access between 6 and 12 nautical miles from the shore and for vessels that had fished these waters between 1953 and 1963.

The EU Common Fisheries Policy (CFP) copied and used the 6-12 nautical mile rights of the London Convention as a tool to create historic rights within the CFP.

However, the UK 200 nautical mile EEZ was not created until 1976 with the Fisheries Limits Act, with the area within the extended limits being instantly subsumed to EU control as the UK agreed to the CFP of "equal access to a common resource" in the UK Treaty of Accession.

Consequently, all historical rights of access to fish in UK waters between 12 and 200nm are derived through the EU's CFP and the Regulations it comprises of.

Therefore, when the UK ceases to be a member of the EU, through Article 50 Section 3 - "the treaties shall cease to apply", the EU fleet will be automatically excluded from the 12 to 200nm limits.

However, as we will revert to previous legislation/agreements in force before entering the EEC in 1973, the London Fisheries Convention 1964 will afford "back door" access to the 6 to 12nm band around the UK.

This would negate the opportunity for the UK to revert to International Law ensuring a clean slate with no historic fisheries access rights to honour.

Denouncing the London Fisheries Convention would ensure a clean slate, providing a strong diplomatic position regarding access rights.

As the London Convention requires two years notice in writing to be denounced, the government must do so before notice on Article 50 is submitted.

If the government does not, there will be an overlap allowing "back door" access to UK waters, squandering the opportunity of this strong diplomatic position.

Diplomatically, this would look horrifically stupid.

Seditiously, it would allow EU vessels access, and therefore the ability, to claim that they had acquired/continued historic rights under UK law. They would argue and contest allocations to fish conjoined with a legal fight to remove the EU fleet from the 6-12nm band.

Consequently, if the government does not take the easy step of denouncing this Convention before Article 50 is triggered, it will indicate that there is no intention of making or taking a serious stand on fishing.

It would be a graphic indication that fishing, coastal communities and the opportunity of automatic repatriation of an industry that could be worth £6.3bn annually, is to be betrayed a second time.

This Convention should not be allowed to negate and sacrifice the opportunity of UK withdrawal to reclaim one of the British peoples greatest renewable resources that was sacrificed for EU membership in 1973.

This comes down to the decisions and responsibility of Government and MPs to decide if they want an automatic repatriation or to inform the British people they have continued access for EU vessels to catch the UK's fisheries resources.

Fishing could be a triumph for Brexit and this Government. There is massive potential to start afresh and rebuild and rejuvenate the UK fishing industry, coastal communities and a multi-billion-pound industry for the economy.

Fisheries will signify whether we've "taken back control of our borders" as it has come to epitomize our surrender and enmeshment in the EU. It will therefore be the "acid test" of Brexit.

The London Convention of 1964 must be denounced as a tangible and immediate demonstration of the will of MPs and government to repatriate and safeguard all access rights to the nation's greatest renewable resource.

LONDON CONVENTION ON FISHERIES 1964

ARTICLE 3 Within the belt between six and twelve miles measured from the baseline of the territorial sea, the right to fish shall be exercised only by the coastal State and by such other Contracting Parties. the fishing vessels of which have habitually fished in that belt between 1st January, 1953 and 31st December, 1962.

ARTICLE 15 The present Convention shall be' of unlimited duration. However, at any time after the expiration of a period of twenty years from the initial entry into force of the present Convention, any Contracting Party may denounce the Convention by giving two years' notice in writing to the Government of the United Kingdom of Great Britain and Northern Ireland. The latter shall notify the denunciation to the Contracting Parties

The Start of the Common Fisheries Policy

Regulation 2141/70 - the foundation stone of the Common Fisheries Policy and "Equal Access to a Common Resource".

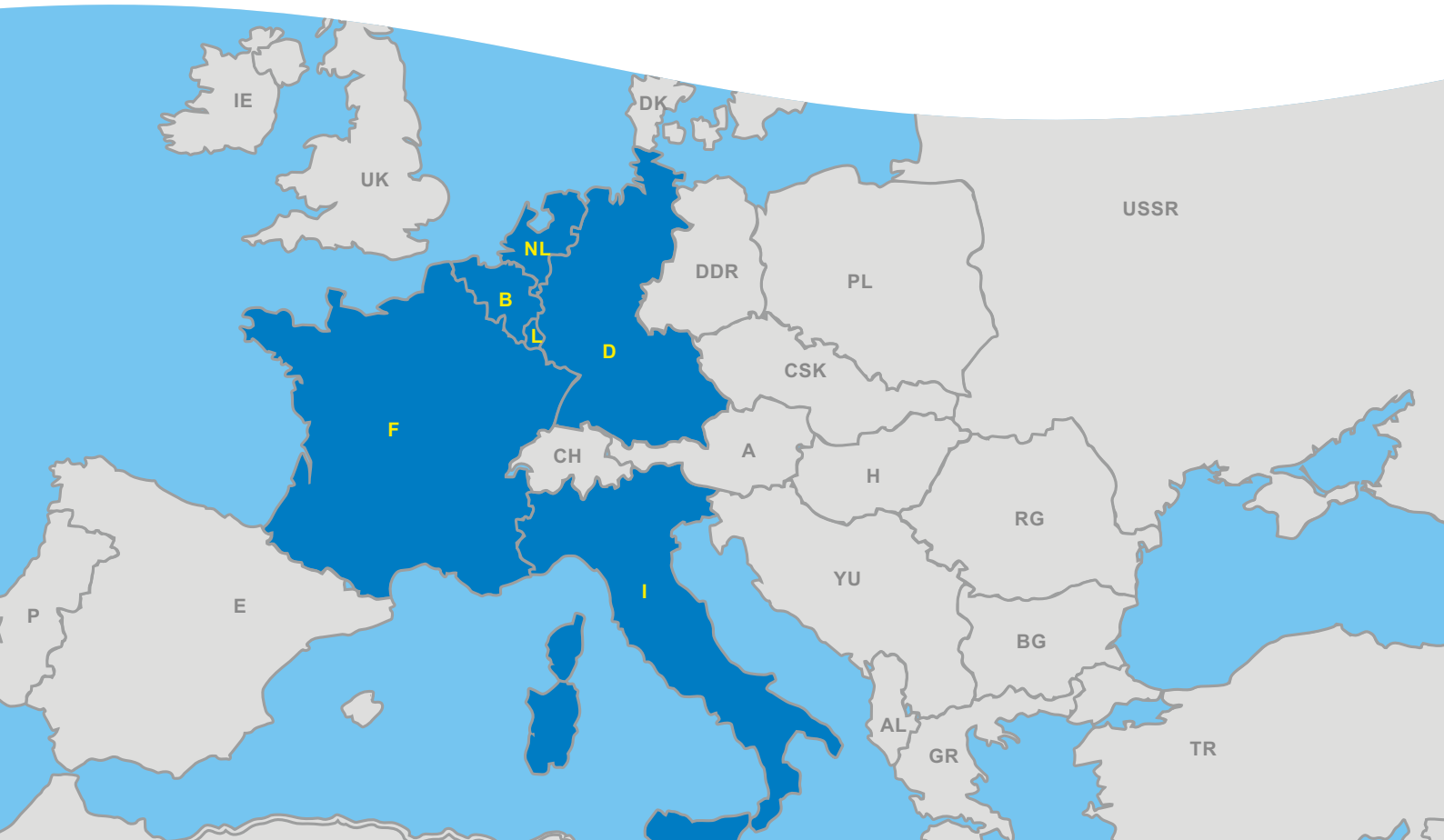
Fisheries was one of the first areas the EU took control over with Fisheries becoming an 'exclusive competency' from the start.

Resultantly, the entire EU Common Fisheries Policy has been constructed of Regulations. These Regulations DO NOT require transposition into national legislation, they are entirely EU constructs. Regulations are direct EU law that governs the UK straight from Brussels with no input from our Parliament or government.

The CFP was conceived with an initial Regulation 2141/70 in 1970 before the United Kingdom joined the then EEC which was accepted with the UK Treaty of Accession.

The most damaging part of this Regulation to the UK is Article 2, which created the keystone principle of the CFP (1).

Both sections detailed opposite are the founding linchpin that the entire Common Fisheries Policy is derived from and built upon.



ARTICLE 2, SECTION 1

1. *Rules applied by each Member State in respect of fishing in the maritime waters coming under its sovereignty or within its jurisdiction shall not lead to differences in treatment of other Member States.*

   Member States shall ensure, in particular, equal conditions of access to and use of the fishing grounds situated in the waters referred to in the preceding subparagraph (above) for all fishing vessels flying the flag of a Member State and registered in Community territory.

This established that every Member State of the EEC (now EU) would hand over the living marine resource (fish and shellfish) from within their fishing zone to the EU, to be shared equally and without discrimination among everyone else.

Consequently, the foundation stone of the CFP allows the EU to subsume control of fisheries and share them out to common grazing. This is where "equal access to a common resource" originates from.

This Regulation was written with the knowledge that the Northern nations of Britain, Ireland, Denmark, Norway and Iceland were disposed towards joining the then EEC.

The principle of "equal access" was designed to allow the EEC, primarily France, unfettered access to these northern nations rich fisheries resources.

ARTICLE 2, SECTION 3

3. *The maritime waters referred to in this Article shall be those which are so described by the laws in force in each Member State.*

This established the EU did not have its own fishing grounds but rather was given control by Member States over theirs. It makes the provision that it shall include all waters of the member state regardless of boundary changes. This shows the UK already has an EEZ, recognised by the Fishery Limits Act 1976, which has been subsumed and can be unshackled from the EU upon withdrawal.

Once this Regulation 2141/70 became part of EU Law, known as the Acquis Communautaire, all member states, current or joining, have to accept it.

They must accept the Acquis and its Regulations in full, without exception, other than for transitional derogations to give time for the Acquis to be implemented.

When the CFP was conceived, the international normality was for territorial waters to be a 6 or 12 nautical mile limit, as had been defined in the London Fisheries Convention of 1964.

When international limits began to be extended to 200 nautical miles in the mid to late 1970s, what the EEC petty thieves, who had set off to rob the post office of the

> *"The story of the CFP is one of most cynical smash-and-grab raids in the history of the European Union."*

12-nautical mile limit was found that they had actually managed to get into the bank vault of the 200.

Regulation 2141/70, and the provisions of it, were accepted in full with the UK's Treaty of Accession (see Section 1, page 21) when Britain joined three years later. This is the start of the greatest betrayal of one of the richest resources of our nation.

Regulation 2141/70 is the foundation and linchpin that the rest of the Common Fisheries Policy is constructed upon.

The founding principle of "equal access to a common resource" opened Britain's rich fishing grounds to the EU fleet.

With Britain having the lion's share of resources, with the richest fishing grounds in Europe, under this regulation, providing equal access, the UK had the most to lose.

Reciprocal access, forced unrestricted upon the UK through this founding tenet of the CFP – "Equal access to a common resource", became a one-way street massively to our detriment.

Regulation 2141/70 underpins the subsequent Regulations that carved up these resources, which had been subsumed to EU control, using an EU Quota system and relative stability shares of these EU Quotas.

The mismanagement and deprivation of our own resources starting with Regulation 2141/70 is what led to 60% of the UK fleet being scrapped. Correctly termed as "accommodation" not "conservation".

Should the government adopt the provisions of Regulation 2141/70 as part of the adoption of the Acquis under the Great "Repeal" Bill then it will have transposed the founding crux of the fisheries issue into UK law.

The government will have adopted and recognised the rules and right of the EU fleet to fish UK waters. In doing so the Government will have squandered the opportunity to reclaim our fishing grounds, by reverting to the terms of international law under UNCLOS-3 when the CFP ceases to apply upon UK withdrawal.

This would also squander all negotiating capital provided by starting with control of our fishing grounds and resources.

> *In short to adopt this regulation, indeed any CFP regulation, would be the second deliberate betrayal of British fishing resources and would be political suicide to do so.*

Britain Joins the EEC - 1973

> *"The importance of the fishing industry was pivotal to the Norwegian refusal to join the EU, meanwhile Edward Heath was quite willing to destroy our own in his desperation to join the EEC."*

UK Treaty of Accession of 1972 fully accepts the entire Acquis and the CFP Regulation 2141/70

The United Kingdom joined what was then the EEC on the 1st of January 1973. Two legal mechanisms were enacted to allow UK membership. The UK Treaty of Accession 1972 (1) of the EEC and the European Communities Act 1973 of Parliament which allows for EU Law to exert authority over the UK (see Section 1, page 9).

The UK's rich fishing grounds, some of the finest in the world, were completely surrendered in order to join.

To understand how and what the implications of a UK withdrawal are on fisheries one has to go back to the beginning with the UK Treaty of Accession.

Articles 100 to 103 of the Treaty of Accession dealt with Fisheries, the most important being Article 100 (1):

UK ACCESSION TREATY, ARTICLE 100

1 . Notwithstanding the provisions of Article 2 of Regulation (EEC) No 2141 /70 on the establishment of a common structural policy for the fishing industry, the Member States of the Community are authorized, until 31 December 1982, to restrict fishing in waters under their sovereignty or jurisdiction, situated within a limit of six nautical miles, calculate from the base lines of the coastal Member State, to vessels which fish traditionally in those waters and which operate from ports in that geographical coast area; however, vessels from other regions of Denmark may continue to fish in the waters of Greenland until 31 December 1977 at the latest. (2)

Although the above wording may seem innocuous, by joining the EEC, and with the Treaty of Accession, the UK had fully accepted the Acquis Communautaire -the body of EU law (see Section 1, page 3) and consequently Regulation 2141/70 (see Section 1, page 17) which created a Common Fisheries Policy with "equal conditions of access" for all member state fishing vessels to all member states waters

Article 100 of the Treaty of Accession also provided for a continuation and adoption of the fishing rights created within the 12 nautical mile limit by the London Convention of 1964.

The Treaty of Accession seditiously provided for the implementation of an EU wide system of fisheries protection by 1983 to ostensibly protect the fishing grounds in Article 102 and 103 of Regulation 2141/70.

This superficially contrite wording allowed the EU to implement a system of EU Quotas to divide out the resources subsumed under equal access and the CFP to the member states.

Accepting Regulation 2141/70 in order to join had dire consequences for the British fishing industry. The United Kingdom's rich fishing grounds, some of the finest in the world, were completely surrendered and betrayed as they were subsumed to EEC/EU control.

Tragically Prime Minister Heath, in his desperation to join the EEC before the next general election, completely capitulated, deceiving Parliament over the Fisheries issue.

When Heath was asked by negotiators about the regulations that the British had reservations on they were told to "swallow the lot and swallow it now" (3). Britain's fishing industry, fishermen and their generations-old communities were regarded as "expendable".

If the Government adopts the provisions detailed above then it will have conducted the second great betrayal of Britain's greatest natural, renewable resource by allowing the continuation of the mechanisms the Treaties and Regulations provide to allow the EU fleet access to UK waters and shares of the fish stocks within.

1. http://eur-lex.europa.eu/collection/eu-law/treaties-accession.html
2. https://publications.europa.eu/en/publication-detail/-/publication/faf8bc88-b4f4-423a-969d-5edd69304bf7/language-en
3. http://www.telegraph.co.uk/news/uknews/1354384/Britain-was-ready-to-pay-any-price-to-join-EEC.html

The Fishery Limits

In the 1970s the majority of independent nations began to extend the sea area falling within their sovereign jurisdiction out to the 200 nautical mile or the median line.

The UK has never been an independent coastal state through the period that international limits have been extended to 200 nautical miles and managed under the internationally agreed terms of UNCLOS 3 (see Section 2, page 3).

Control of UK fisheries which was surrendered in the terms of the UK's Treaty of Accession upon joining the EU which subsumed control of the UK's greatest natural resource.

The historic actions of Norway, Iceland and Faroe sets a precedent as the UK looks to revert to the terms of international law under UNCLOS 3.

The most famous example of nations safe-guarding their fisheries resources for their strategic national benefit is the Icelandic Cod War between Iceland, newly exerting its 200 nautical mile limit, and Britain, which contested that it's fishing fleet should be allowed to continue to fish in the Icelandic waters it historically did so.

The Cod Wars and the removal of the UK fleet from Icelandic waters set a precedent of a nation husbanding its fisheries resources for the benefit of the nation, to the exclusion of foreign nations fishing fleets, regardless of historic work patterns.

It is a common gross misconception that the UK must "create" or "recognise" the UK Exclusive Economic Zone (EEZ).

The UK fisheries limit of 200 nautical miles (or the median line) from the baseline, establishing and recognising the UK EEZ, was created by the British Act of Parliament - Fishery Limits Act 1976.

FISHERY LIMITS ACT 1976 - BRITISH FISHERY LIMITS

1. Subject to the following provisions of this section, British fishery limits extend to 200 miles from the baselines from which the breadth of the territorial sea adjacent to the United Kingdom, the Channel Islands and the Isle of Man is measured.
2. Her Majesty may by Order in Council, for the purpose of implementing any international agreement or the arbitral award of an international body, or otherwise, declare that British fishery limits extend to such other line as may be specified in the Order.
3. Where the median line defined below is less than 200 miles from the baselines referred to in subsection 1, and no other line is for the time being specified by Order in Council under subsection 2, British fishery limits extend to the median line.
4. The median line is a line every point of which is equidistant from the nearest points of, on the one hand, the baselines referred to in subsection 1 and, on the other hand, the corresponding baselines of other countries.

The Act received Royal Assent on the 22 December 1976, and came into force on the 1st. January 1977.

Unfortunately, due to the terms of the UK Treaty of Accession to the EEC, all fisheries resource and waters of all Member States were pooled under EU jurisdiction.

> *"The UK needn't create or recognise the UK EEZ upon withdrawal - it already exists through the Fishery Limits Act 1976."*

Section 3 of Regulation 2141/70 (see Section 1, page 18) made provision for the appropriation of all Member State waters regardless of boundary changes, which subsequently included the massive sea area of Member States EEZs, which automatically came under the competency of the EU Commission.

REGULATION 101/76

The appropriation of Member States newly established 200 mile limit was reiterated in Regulation 101/76 of 19 January 1976. This created a common structural policy for the fishing industry commencing 1st. February 1976.

ARTICLE 2, SECTION 1

Rules applied by each Member State in respect of fishing in the maritime waters coming under its sovereignty or within its jurisdiction shall not lead to differences in treatment of other Member States. Member States shall ensure in particular, equal conditions of access to and use of the fishing grounds (1) situated in the waters referred to in the preceding sub-paragraph for all fishing vessels flying the flag of a Member State and registered in Community territory.

Regulation 101/76 - http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31976R0101&qid=1483398960856&from=EN

“The Cod Wars set a precedent for the UK to husband its fisheries resources for the benefit of the nation, to the exclusion of foreign nations fishing fleets regardless of their historic working patterns.”

ARTICLE 2, SECTION 3

The maritime waters referred to in this Article shall be those which are so described by the laws in force in each Member State.

The above Regulation allows the EU to claim each Member States EEZ of 200 nautical miles or median line.

What this establishes is that the EU does not have its own fishing grounds, but rather was given control by Member States over theirs.

Consequently, with UK withdrawal from the EU there is no need to “create” or “recognise” the UK Exclusive Economic Zone (EEZ). It already exists but has been surrendered/subverted to EU control.

When EU law ceases to apply in the UK through the repeal of the European Communities Act (see Section 1, page 9) and the terms of Article 50 (see Section 1, page 5) all EU fisheries Regulations “shall cease to apply”.

The UK reverts to the original legislation governing the UK EEZ which is the Fishery Limits Act 1976 and subsequent amendments up to 2009.

This results in full control automatically reverting to Parliament, giving the UK full control of the UK EEZ and sole discretion as to which vessels fish within that zone.

The Territorial Sea and the Exclusive Economic Zone are two different legal entities.

The difference is often misunderstood but it is crucial to recognise the difference between these two distinct legal entities shown on the map overleaf.

TERRITORIAL SEA

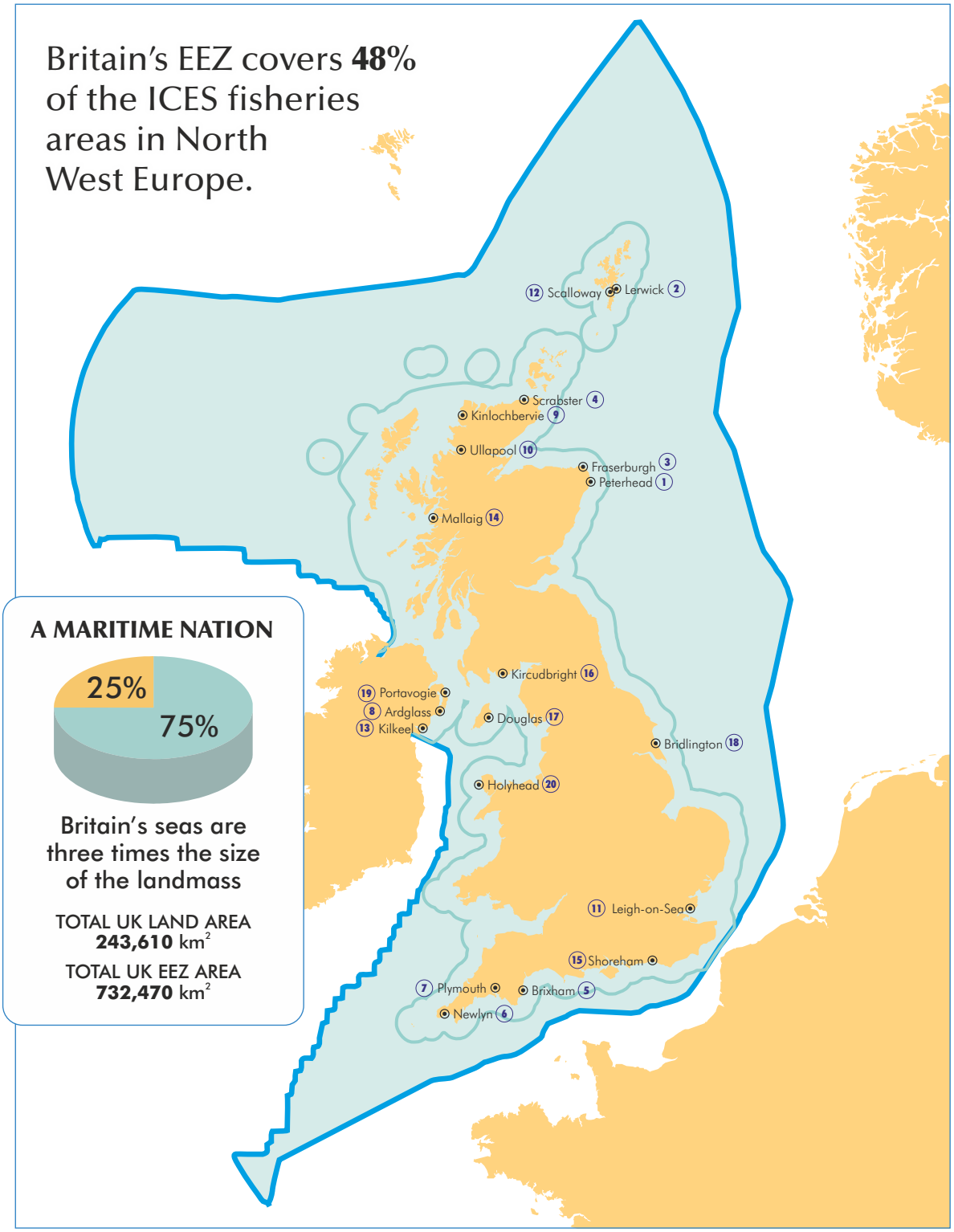
The Territorial Sea is the area extending between the baseline (usually the mean low water mark) and 12 nautical mile limit extended from this baseline. International law confers full sovereignty over these waters, allowing a nation to exert full control over the area within.

EXCLUSIVE ECONOMIC ZONE

Exclusive Economic Zone (EEZ) is the area extending from the baseline out to 200 nautical miles or the median line between two countries.

International Law confers a “sovereign right” over a nations EEZ. This gives the coastal state the rights to all living and mineral resources within this sea area.

UK Fishery Limits Map



TERRITORIAL SEA - 12 nautical mile boundary

UK EXCLUSIVE ECONOMIC ZONE
200 nautical mile/median line boundary

Newlyn 6 Top 20 UK fishing ports by tonnage and value

All sea areas above produced by UK Hydrographic Office

Creation of EU Quotas - Regulation 170/83

The Regulation creating an EU system of Quota allocations, sharing out Member State's resources through an EU Relative Stability Mechanism.

Council Regulation (EEC) No 170/83 of 25 January 1983 established an EU system for the conservation and management of fishery resources.

This Regulation created an EU system of Quota allocations sharing out the Member State's fisheries resources through this EU Quota system under the mechanism known as Relative Stability .

Consequently, with the UK having the lions-share of fisheries resources, the UK had the most to lose in this EU carve-up of fisheries resources.

Within the UK industry and Government there is a common misconception that Quotas are either a UK system or an all transcending international given - **they are not**.

Quotas and Relative Stability are entirely an EU construct and mechanism. Devised under the CFP and imposed upon the UK from our legal adherence to the Acquis Communautaire and therefore the Common Fisheries Policy.

Quotas are a mechanism for the EU to share out the resources of each Member State. To facilitate the primary objective of the CFP - an EU fleet with equal access to a common resource.

Regulation 170/83 also recognised the historic rights from the London Fisheries 1964 Convention and converted and absorbed them into EU regulation format.

These adopted Historic rights of access and catching provided a basis upon which to base these EU Quotas and a formula for the Relative Stability Share Outs of them.

Upon UK withdrawal the treaties and therefore the CFP "shall cease to apply".

As Relative Stability and Quotas are an EU construct they will be no longer applicable upon withdrawal.

This automatically repatriates all the UK's fisheries resources within the UK EEZ in their entirety, as the UK can revert to the terms of international law under UNCLOS 3.

> *"There will be No EU Quotas or Relative Stability shares to negotiate as they cease to apply with the Treaties and CFP."*

There will be nothing to negotiate – all resources within UK waters, currently held by other EU member states and allocated under the EU Quota system will have automatically returned to the UK.

Those adhering to the idea that the UK will start from a position of Quotas and Relative Stability, fundamentally fail to understand that they are a construct of the CFP and its equal access objectives.

EU Quotas have been a disastrous management regime in the highly mixed demersal fisheries around the UK having forced a policy of mass discards upon fishermen in order to comply with quota limitations.

To continue with such an ecologically disastrous system as EU Quotas would obliterate any protestations and pretensions of government to run a sustainable UK fisheries policy.

Continuing EU Quotas, by either adopting the Acquis Communautaire and the CFP Regulations or mirroring them in a post Brexit policy, would be operational and conservation madness and diplomatic folly.

If the UK recognises, adopts or continues EU Quotas or Relative Stability in anyway it will diplomatically give the EU system credence.

Due to the terms of international treaty law, the Vienna Convention on Treaties and Human Rights legislation it runs the huge danger of the status quo continuing.

The UK would, in effect, be running a CFP mark II in parallel to the EU. This would allow the continuation of Equal access and a division of UK resources among the remaining EU member states.

This would not only squander the diplomatic position of 'our fish in our waters' but would be an abject second betrayal of the UK industry and the opportunity to automatically repatriate a UK national resource upon withdrawal - it would be totally unacceptable.

The Government must therefore make a clean break – ensure no facets of the CFP are transposed and adopted into UK law and implement a sustainable fit for purpose policy as detailed in the subsequent pages.

Devolution - who has fisheries authority?

The difficulty for fisheries is not withdrawal from the EU but the Devolution settlement which could have severe operational and constitutional consequences.

The United Kingdom is the independent nation state that joined the EU - not the individual constituent parts.

Consequently, it is the United Kingdom that is the Member State that must adhere to the Treaties and their obligations. It is therefore only the United Kingdom which can redefine the relationship with the European Union.

Devolution does not create independent governments, powers are given under the auspices of the Devolution Acts passed by the UK Parliament.

This is in a similar manner to EU law, which is given authority and precedence through an Act of the UK Parliament – the European Communities Act, 1972 (see Section 1, page 9) - this Act is the portal for EU law to have jurisdiction over UK.

The UK surrendered control of fisheries to the EU, by being bound by the Regulations of the CFP (see Section 1, page 17), having accepted EU Law, the Acquis Communautaire (see Section 1, page 3), with the UK's Treaty of Accession (see Section 1, page 21).

Therefore, it is the European Communities Act of UK parliament, and the Devolution Acts of the UK Parliament, that operate as portals to allow EU fisheries law to flow straight to devolved assemblies

Consequently, as it is Acts of the UK Parliament that allow the system to function, the UK government is still in overall authority. However, Westminster has been hollowing itself out, as power is slowly ceded - it is the dissolution of the UK by increments.

Fisheries became a Devolved issue with the Scotland Act 1998 and the Marine (Scotland) 2010 Act giving jurisdiction over fisheries out to the 12 nautical mile limit. Therefore, these Acts only apply to fisheries management between the base line and 12nm -the territorial sea.

- Marine Scotland manages the 0 - 12nm around the Scottish coast, and for devolved and executively devolved functions, under the Marine and Coastal Access Bill, out to 200nm. However, MMO will be responsible for reserved matters in the seas between 12 - 200nm around Scotland.
- In the offshore area adjacent to Scotland, the UK Bill makes provision for Scottish Ministers to be the planning authority, although marine plans would have to be agreed with the Secretary of State.
- In the sea from 12 - 200nm Scottish Ministers can designate MCZs (known as Marine Protected Areas - MPAs) under the UK Bill with agreement from the Secretary of State. These will be complemented by MPAs designated in Scottish waters out to 12nm under the Marine (Scotland) Bill.
- Scottish enforcement officers, working for Scottish Ministers, will enforce licensing arrangements under the Marine (Scotland) Bill out to 12 nm, and under the Marine and Coastal Access Bill beyond 12nm. Scottish enforcement officers will enforce Scottish nature conservation legislation out to 12nm under the Marine (Scotland) Bill, and enforce Marine Protected Areas beyond 12nm using powers under the UK Bill.

Upon withdrawal, competency over fisheries and the UK EEZ, will return to the UK Government, who can replace the ultimate authority of the CFP with a new independent UK fisheries policy.

> *"Contrary to inevitable SNP grandstanding, a UK wide policy would not in fact result in any reduction in the scope of the powers of the devolved legislatures, since it would simply replace existing EU powers."*

Therefore, although their co-operation would be preferable, it is not the duty, nor within the powers, of the Devolved administrations to make arrangements, directly influence or make demands for overall fisheries arrangements during, or after withdrawal, except for within the territorial sea area inside the 12 nautical mile limit, within their jurisdiction.

The majority of the UK EEZ out-with the territorial sea area is the sole responsibility of the UK government, who should design a UK wide policy that maintains the structural integrity of the UK, and the ability of the larger class of fishing vessel to maintain their ability to roam British waters under their British fishing vessel licence.

www.parliament.scot/Research%20briefings%20and%20fact%20sheets/SB09-59.pdf

Devolution - EU Regionalisation

Fishing is representative of what is happening to the country as a whole – fisheries has been at the forefront of EU constitutional usurpation

The difficulty for fisheries is not withdrawal from the EU, but the Devolution settlement post Brexit, which could have severe operational and constitutional consequences.

As the EU subsumed control of the UK EEZ, and the fisheries resources within it, devolution has been used to further the EU ideal of regionalisation of the Member States.

This system allows power to be exercised direct from Brussels to the regions. In effect Devolved Assemblies are branch offices for Brussels with limited autonomy.

The end goal is the creation of a direct link from the central authority of the EU to the devolved regions, rendering Westminster and the Nation State redundant. The arrangements for the fishing industry are a microcosm of this process.

The gradual EU drift towards fishery regionalisation, piggy backing on the legislation passed by the UK Parliament for Devolution, has created the frame work for this regionalisation.

Fishing for Leave advocates strengthening regional management within the 12nm framework. This would benefit inshore fishermen who, due to the size of vessel, are more restricted to their locality.

However, jurisdiction over territorial waters is not the problem.

The problem is within the Marine and Coastal Access Act 2009, Article 41. This Act makes the provision which allows the Secretary of State to partition the UK EEZ into separate areas of jurisdiction.

MARINE AND COASTAL ACCESS ACT 2009, ARTICLE 41

1 The rights to which this section applies have effect as rights belonging to Her Majesty by virtue of this section

2 This section applies to all rights under Part V of the Convention that are exercisable by the United Kingdom in areas outside the territorial sea.

3 Her Majesty may by Order in Council designate an area as an area within which the rights to which this section applies are exercisable (an "exclusive economic zone").

4 The Secretary of State may by order designate the whole or any part of the exclusive economic zone as an area in relation to which the Scottish Ministers, the Welsh Ministers or any Northern Ireland department are to have functions.

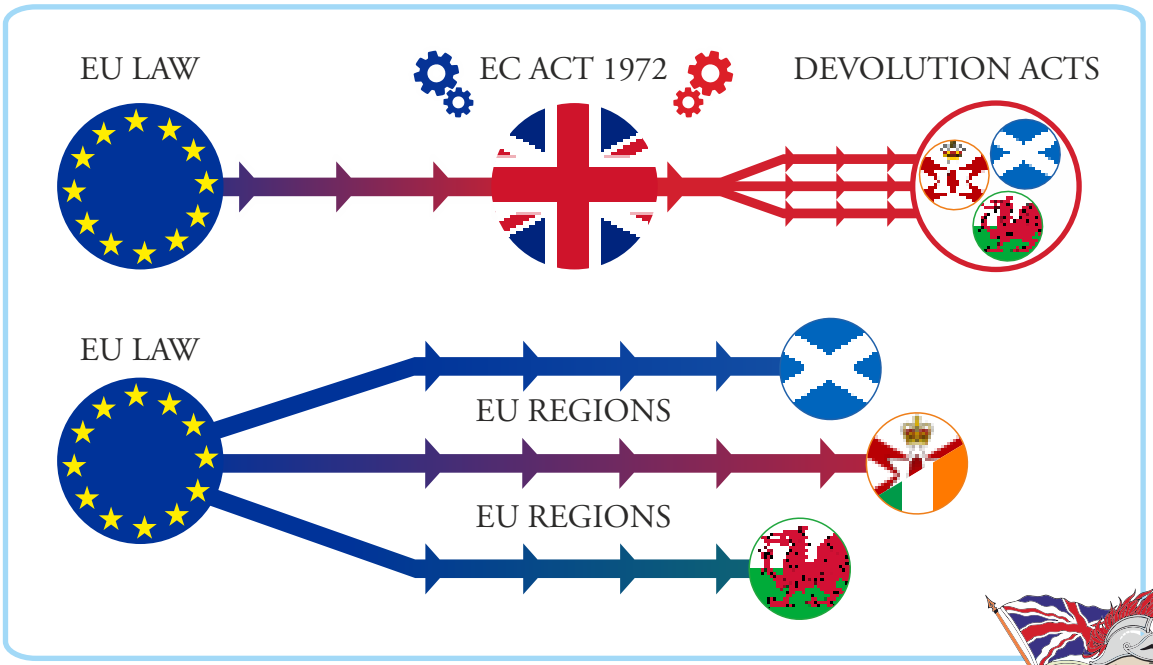
This would effectively devolve jurisdiction for fisheries within the 12nm to 200nm and give control over these waters to the devolved administrations – it would effectively create a fully functioning Scottish EEZ which would be independent in all but name.

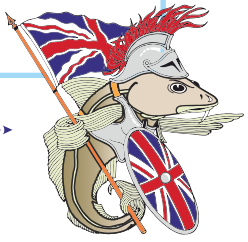
The provisions of this Act show the political establishment were complicit and prepared to allow the EU agenda of regionalisation of the Member States for easy direct EU control (i.e. devolution) to render the nation state obsolete in a supranational body.

As Devolution, and the regionalisation of the UK EEZ, is underpinned by Acts of the UK parliament it will remain in force upon withdrawal.

This will continue the system of regionalisation, causing huge administrative and operational headaches and pigeon holing of the industry.

Of greater severity, it could precipitate a constitutional crisis on the integrity of the United Kingdom, which, upon being free of the subversion of the regionalisation program of the EU, will have to function as a fully independent nation again.





Devolution within UK withdrawal

"Withdrawal from the EU returns the UK to sovereign nation state – further constitutional fragmentation under devolution must be resisted to maintain the stability of our industry and our nation."

Fisheries Devolution could set in train the break up of the whole UK

Upon UK withdrawal, the EU Common Fisheries Policy (CFP) shall cease to apply. Competence and jurisdiction for fisheries will return to the UK, as the independent nation state, which will be responsible for fisheries within the boundaries recognised by international law under the provisions of UNCLOS 3.

However, the UK Acts allowing for devolution and the regionalisation of fisheries will remain in place. If allowed to continue they will cause the balkanization of the UK EEZ into four regions.

Continuing with the devolutionary process would be of seismic danger and precipitate a constitutional crisis for the integrity of the UK.

Continuing with Devolution and partitioning the UK EEZ, as allowed in the Marine Act 2009, sets a massively dangerous constitutional pretext if a Scottish EEZ is created under jurisdiction from Edinburgh/SNP and must be resisted.

An independent fisheries EEZ would preclude a demand for the mineral rights (oil and gas) of the EEZ. Once an independent Scottish water zone is created then logical progression would be to demand an independent Scottish land zone.

Fisheries could set in train a precedent precipitating independence in increments and could see the destruction of the United Kingdom.

Those surreptitiously advocating a Scottish fisheries EEZ do so through either short sighted focus upon financial self-interest or personal ideological dispositions to the SNP position.

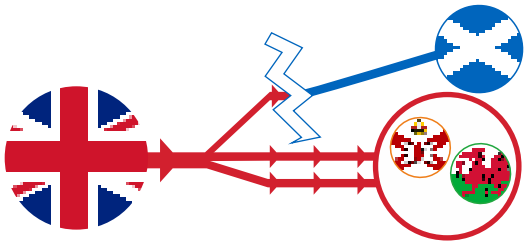
The Scottish Fishermen's Federation have repeatedly asserted of a "Scottish" EEZ - there is no such constitutional entity in either domestic or international law.

Those operating in northern waters perceive a "Scottish" EEZ as beneficial to create their own Scottish fisheries "fiefdom".

With close connections to Marine Scotland and the SNP, this is a worrying situation, with the SNP happy to utilise this to further this Scottish dimension.

> *"After years of political hardship in the CFP fishing should not become a political rope in constitutional tug of war with the SNP."*

This operational and constitutional short sightedness furthers the agenda of those wishing for the UK to remain integrated to the EU project and the SNP's EU agenda.



Partitioning the UK EEZ would see four different legislatures implementing divergent policy, causing an operational and administrative nightmare.

It would punish and curtail a sizeable portion of the UK fleet operating across "borders" and throughout the UK.

The fisheries Concordat shows the issues of regionalisation and divergence.

To avoid creating complex administrative burdens, it's critical that a common UK framework for future British fisheries management establishes the core principles of fisheries policy across the UK.

Competence for fisheries must remain exercised by the Government of the UK.

Westminster is the national government and the UK the coastal state. Westminster should not oblige devolution or independence creep by allowing the continuation of the partitioning of the UK EEZ into Areas defined to suit devolution and the process of EU regionalisation.

Unfortunately, Westminster has created a situation far more difficult to resolve than leaving the CFP. Having acceded to the constitutional dissolution of the UK to fit into the EU project aims of regionalisation.

There must be an unambiguous, fit-for-purpose framework and UK wide fisheries policy to avoid curtailing the UK fleet and creating unnecessary complications and burdens from a partitioned UK EEZ.

Upon withdrawal from the EU the United Kingdom government must look to reassert its constitutional integrity to survive rather than fracture into disparate parts.

Westminster must have the conviction to sort this self-inflicted problem out unless the Establishment intends to capitulate further and continue down the route of a shadow EU and CFP.

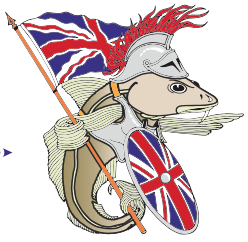
For both the fishing industry and the United Kingdom, Fishing for Leave stridently asserts that Westminster must put the brakes on Devolution.

WERE AN INDEPENDENT SCOTLAND TO RE-JOIN THE EU

Rejoining would see the Scot's industry decimated. Prospective member state must Adopt the Acquis Communautaire in full (see Section 1, page 3), therefore adopting the CFP, EU Quotas and the Relative Stability Shares of them.

With rUK's EEZ unavailable to the EU fleet, an independent Scotland's EEZ would represent the prime of EU fishing grounds.

With the political establishment in Scotland replicating Edward Heath's craven desperation to join the EU, a replication of the betrayal of fisheries resources to join would happen again.



Section Two

Future UK Management

Days-at-Sea, Technical Measures and No Discards

"Future UK policy must address the cause of discards not ban the symptoms."

FISHING FOR LEAVE

"A new British regime can neither reward the haves nor the have nots - it must take the industry forward together for a new start."

FISHING FOR LEAVE

"Accuracy cannot be achieved by multiplying estimate by approximate, adding a guesstimate and dividing it all by assumption."

MENAKHEM BEN-YAMI - FISHERIES SCIENTIST

EU Quotas cause needless mass discarding of prime fish

Fishing for Leave's 14 Main Policy Points

1 Full withdrawal from the EU (as voted for) with no adoption of the fisheries sections of the Acquis Communautaire transposing EU regulation and the CFP into UK law – fisheries should be exempted from the Great Repeal Bill.

2 Restore full UK control over our EEZ and automatically repatriate all UK fisheries resources upon withdrawal as per the terms of Article 50, Section 3 with the UK reverting to international law under the terms of UNCLOS 3.

3 No element of the disastrous Common Fisheries Policy to be replicated in UK law. The clean break under Article 50 should be taken. Replicating the CFP is environmentally, operationally and diplomatically ill advised.

4 Exclude all the EU fleet, using the strong negotiating position of their necessity of access to our rich resources to extract the best reciprocal deals. Any future access agreements should only be on a needs must, equal exchange or better, basis for the UK fleet. Equal exchange must not be equal access in all but name.

5 An environmentally and economically fit for purpose policy, that is inclusive of and benefits all in the industry, must be implemented. Future policy must create firm foundations for economic vitality and sustainability, to provide a firm future to rebuild a home grown, community based industry all around the nation.

6 A resources amnesty should be enacted - Shares of current UK allocations and investments in them should be respected for business stability and continuity. However, ALL repatriated resources should be held in a government pool and allocated for the benefit of all fishermen and communities. Fisheries resources belong to the nation and should be for the betterment of all the industry not corporatized.

7 All future UK fisheries entitlements to repatriated resources should be de-monetarised and held in a government pool. To stop the present system of buying/renting quota, which undermines-profitability, fishing communities and fishing heritage whilst causing vessels to fish harder.

8 Fish stocks should be managed as a renewable resource and aim for a maximum exploitation yield from a sea area. Currently we have Maximum Sustainable Yield (MSY) on individual species which is ill founded - stocks are in an interdependent ecology, imagining a maximum of everything ignores their interdependence and our inability to predict it. UK mixed fisheries management should emulate the Faroese pyramid approach to marine ecology.

9 A future fishery management regime must have sustainable foundations and fit the ecology of the UK's mixed demersal fisheries. The failed system of EU Quotas does not work in mixed fisheries and are the cause of discards. Policy must end the cause of discards (quotas) not ban the symptoms. A quota regime and discard ban will decimate the fleet with choke species.

10 The UK must transition to a Days-at-Sea keep what you catch system for demersal mixed fisheries, that changes current FQA Entitlements to express them as catch composition percentages. This would provide business stability on investments in FQAs whilst ending arbitrary kg quota limits. Days-at-Sea work ecologically in a mixed fishery, reduces the regulatory burden in being simpler to administer, gives better scientific data with keep what you catch, ends sectoral in-fighting and means land more but catch less with an end to the cause of discards.

11 A future UK fisheries management regime should exempt small vessels (under 10 metres) from most measures aside from a day's limit and technical measures. It must be accepted that smaller vessels have a limited ecological impact and are a nursery for young fishermen and vital to local communities.

12 To ensure future UK governance recognises fishermen as the primary stakeholders with the greatest interest in sustainability of the marine environment - the unparalleled expertise of commercial fishermen should be recognised and accounted for. As food suppliers, commercial fishermen should be preferential stake holders with proportionate numbers to angling, environmental interests and IFCA representation on all policy making.

13 A UK wide fisheries institute should be created so that fishermen and scientists are encouraged to work together, in a similar format to the successful model created by Norway to produce accurate stock assessments. Using accurate real–time catch data from vessels facilitated under a Days-at-Sea keep what you catch system.

14 To work with other Nordic nations through N.E.A.F.C in broad but unbinding agreements to manage fisheries and control all supply and marketing to a hungry EU market for the benefit of the UK.

UNCLOS 3 - Reversion to International Law and Restoration of full UK control

Upon withdrawal, control over the UK EEZ and all resources therein will automatically be repatriated, with the UK reverting to international law under the terms of UNCLOS 3.

International law regarding fisheries is laid down in UNCLOS III (United Nations Law of the Sea 3) of which both the UK (1996) and the EU (1997) are signatories.

Upon reading UNCLOS 3 it becomes clear that when the UK withdraws, and the EU Treaties "shall cease to apply" (as agreed in Article 50 section 3 of the TEU), that full control over the UK EEZ and all fisheries resources therein will revert to the UK. (section 1, page 5)

UNCLOS 3 gives the UK the right under international law to formally control its own EEZ and manage its own fisheries at its own discretion, the same as Norway, Iceland and Faroe along with most other nations.

UNCLOS 3 outlines the agreements on fisheries in Articles 62, 63 & 64

ARTICLE 61 The coastal State shall determine the allowable catch of the living resources in its exclusive economic zone.

The coastal State, taking into account the best scientific evidence available to it, shall ensure through proper conservation and management measures that the maintenance of the living resources in the exclusive economic zone is not endangered by over-exploitation. Such measures shall also be designed to maintain or restore populations of harvested species at levels that can produce the economic factors, including the economic needs of coastal fishing communities.

ARTICLE 62.2 Utilization of the living resources

The coastal State shall determine **its** capacity to harvest the living resources of the EEZ. Where the coastal State **does not have the capacity** to harvest the entire allowable catch, it shall, through agreements or other arrangements…give other States access to the **surplus of the allowable catch**.

ARTICLE 63.1 Stocks occurring within the exclusive economic zones of two or more coastal States or both within the exclusive economic zone and in an area beyond and adjacent to it.

Where the same stock or stocks of associated species occur within the exclusive economic zones of two or more coastal States, these States shall seek, either directly or through appropriate sub-regional or regional organizations, to agree upon measures necessary to coordinate and ensure the conservation and development of such stocks without prejudice to the other provisions of this Part.

Reading the above it becomes clear that it will be at the UK's discretion as to who, how and when can fish in the UK EEZ.

It will then be at the UKs discretion as to who, how and what can be fished in our waters and as outlined on (see Section 2, page 8) that should be UK vessels only.

This is not unusual and the precedent has been, and was set, in the 1970s with the UK distant water fleet being removed from Norwegian and Icelandic waters.

It also clearly states in Article 61 that it will be at the UK's discretion to determine the allowable catch of living resources within the UK EEZ subject to the provisions of Article 63.1 that a coastal state shall co-operate with neighbours to agree TAC shares of stocks within fisheries areas that fall within both parties EEZ.

The UK will be able to claim sovereignty over all the resources within the UK EEZ and consequently a rightful share of internationally agreed TACs.

The UK would have acted honourably, under the provisions of UNCLOS3, in reclaiming what is recognised as rightfully hers.

Thereafter, it would be the duty of the EU to readjust its currently over inflated fishing opportunities to reflect the withdrawal of the UK from the EU, and the resulting loss of the UK's rich fishing grounds which the EU subsumed forty years ago.

The repatriation of significant proportions of the TAC fishing opportunities, based on the year's previous catches which are indicative of stock distribution as detailed in Section 3 of this book, would only see the UK reclaiming what is rightfully hers.

The UK would not be at any fault or have acted unsustainably. The responsibility and duty to avoid "Derby" fishing by claiming a continued over inflated share of catches, subsequent to the loss of the UK's rich fishing grounds, would fall entirely to the EU.

WHAT UNCLOS MEANS

UNCLOS recognised three marine zones and established the rights that coastal states have relative to these zones.

1. **The twelve mile or territorial seas limit** - Full sovereignty over all that is found within the 12mile territorial seas limit.
2. **The two hundred mile limit, Exclusive Economic Zone (EEZ)** - Sovereign rights over the exploitation of all natural resources (including fish stocks) found within its EEZ.
3. **The High Seas** (That area falling out with the 200miles limit) - The coastal state has jurisdiction rights over its own vessels on the High Seas.

NOTE Generally a state's EEZ extends 200 nautical miles (370.4 kilometres) from the base lines of its territorial seas or to the median line where resulting points would be closer to another country.

"UNCLOS 3 is the fundamental underpinning of international fisheries agreements."

The benefits brought by UNCLOS are clearly evident. Already 86 coastal States have economic jurisdiction up to the 200-mile limit or median line. As a result, almost 99 per cent of the world's fisheries now fall under some nation's jurisdiction.

There is no reason why the UK could not previously do likewise, except that the EU Common Fisheries Policy prevented it.

The UK will be able to reclaim and repatriate all living marine resources within the UK EEZ under the terms of UNCLOS, claiming a rightful share of internationally negotiated TACs through mediums such as the NEAFC.

UK can thereafter manage and husband these resource within the UK EEZ in any manner which the Her Majesty's government see fit.

UNCLOS 3 makes no international recognition of historical rights for EU, or other vessels, to fish in UK waters.

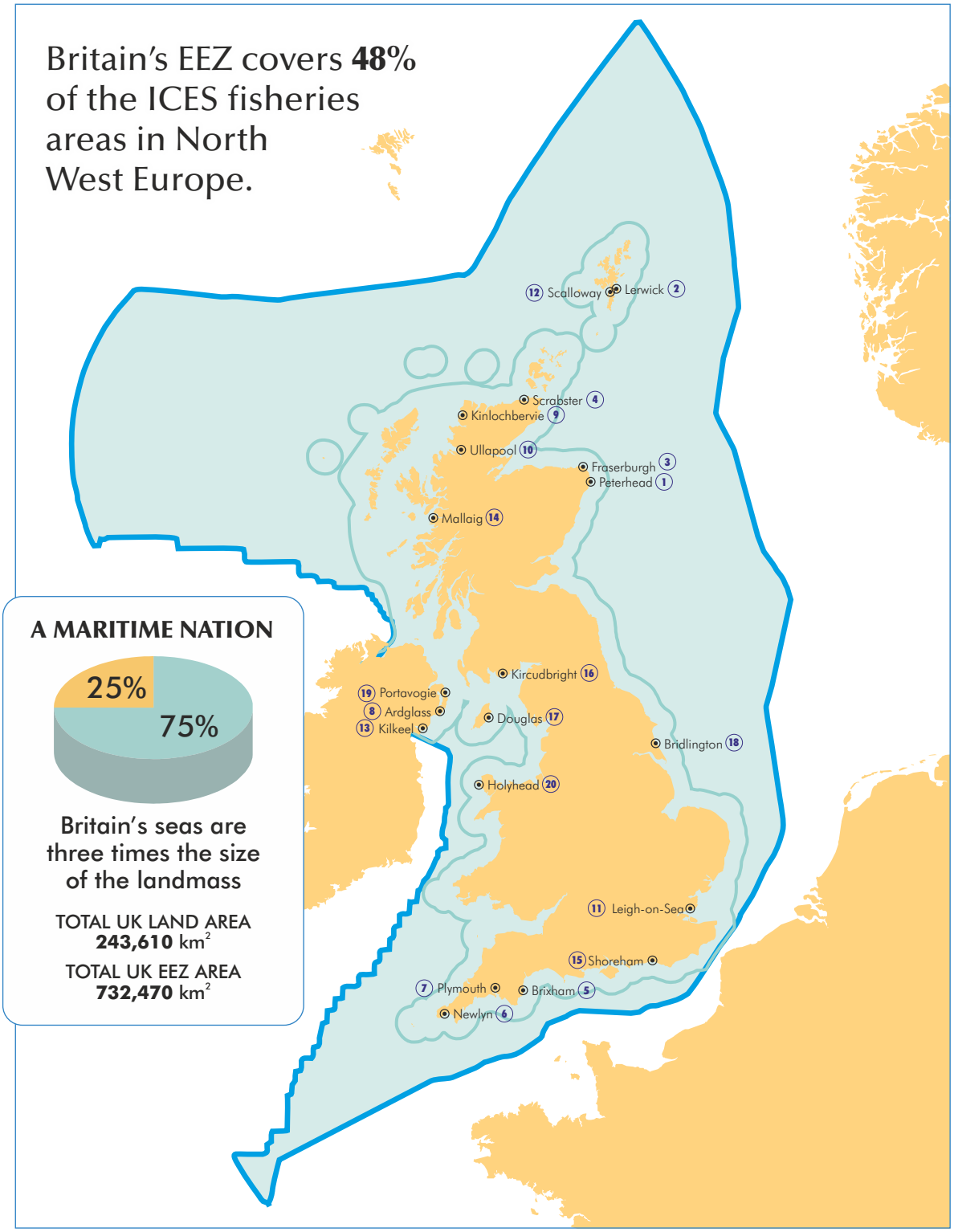
All rights for other EU member states to fish around the UK are derived from EU Treaties and Regulations. As these "shall cease to apply" upon withdrawal, and the London Convention 1964 can be repealed, all historical rights of access shall also cease to apply.

The UK could (indeed did) claim historical rights in Icelandic and Norwegian waters and history shows us this would be a non-starter.

UNCLOS was opened for signature on 10th December 1982 and came into force on 16th November 1994.

It must be understood, and never forgotten, that the tragic CFP is not a natural state of affairs and that other independent sovereign nations manage their fisheries within their Exclusive Economic Zone Exclusively.

Map of the UK EEZ



TERRITORIAL SEA - 12 nautical mile boundary

UK EXCLUSIVE ECONOMIC ZONE
200 nautical mile/median line boundary

Newlyn 6 Top 20 UK fishing ports by tonnage and value

All sea areas above produced by UK Hydrographic Office

http://www.un.org/depts/los/convention_agreements/texts/unclos/part5.htm

Historical Rights, Reciprocal Rights and Future Access Arrangements

The UK should Exclude the EU fleet from UK waters using the strong negotiating position of EU necessity to access the UK's rich resources to extract the best reciprocal deals.

Upon withdrawal all Treaties and Regulations cease to apply as per the terms of Article 50, as agreed by all EU member states in the TEU (see Section 1, page 5).

Consequently, when the CFP and its mechanisms "cease to apply" to the UK, EU historic rights, equal access arrangements and EU Quotas and Relative Stability Shares end, as per the terms of Article 50, section 3 of the TEU. This allows all resources and control to be automatically repatriated to the UK.

This leaves the EU little legal recourse to argue for continuation of historic rights, equal access and resource share outs having agreed a Treaty that ends them.

Although the London Convention 1964 (see Section 1, page 15) , is outwith the Treaties of the EU, it only provides for access between 6 and 12nm and can be repealed with 2 years notice. The UK government should immediately initiate the notification, doing so when triggering Article 50, to terminate the London Convention.

Thereafter, upon withdrawal, the UK will revert entirely to the terms of international law under the provisions of UNCLOS 3 see Section 2, page 3). It will be entirely at the UK's discretion, as to the terms of access, how to manage and how to allocate resources within the UK EEZ.

There will be no historical access rights to affect the ability of the UK to restrict foreign vessels from accessing UK waters.

Historic rights were introduced in the London Convention 1964, rolled over in the 1971 reference period and were enshrined in the UK Treaty of Accession – Section 2, Article 100, parts 2/3.

Equal access was created in the founding of the CFP with EU Regulation 2141/70

Quotas & Relative Stability share outs are entirely EU constructs of the CFP created and under-pinned by EU Regulations 170/83

RECIPROCAL RIGHTS

The United Kingdom has the richest fishing grounds in Europe. The majority of EU catches are taken in UK waters (see Section 3, page 17).

The UK has, on average over the last 5 years, only caught 15% of total UK catches in EU waters. See heat map overleaf.

Although the UK caught £102m in EU waters around a £711 million worth of resources were caught by EU vessels within the UK EEZ and lost to the UK fleet.

With the UK having the lion's share of resources, unrestricted reciprocal access, under the CFP of Equal access to a common resource, has been a one-way street of little strategic benefit and massively detrimental to the UK fleet.

Therefore, the first priority should be to secure the UK EEZ and resources, as the water within the UK EEZ represents the vast majority of UK catches and importance to the UK fleet.

> *"With so much to gain and little to lose, any future reciprocal access should be on a barter and needs must basis - reciprocal access SHOULD NOT become Equal Access in all but name."*

Consequently, due to the EU EEZ representing little overall benefit to the UK it would be in the best interests of the UK to close access and Exclude the EU fleet from UK waters. With the loss of reciprocal access not fundamentally detrimental to UK interests when weighed against what is gained to that lost.

This would provide a diplomatic position of strength, thereafter, the Government should only barter on a basis of equal exchange and only when absolutely necessary to further the UK's strategic interests for fisheries.

Future access agreements should only be on a needs must (equal exchange or better) basis for the UK fleet. The strong negotiating position of necessity to access the UK's rich resources should only be used to extract the best reciprocal deals. (example - in regard to Scallop access in the EU sector of the English Channel).

Although the mutual exclusion of the UK and EU fleet would, in the case of a few fisheries and areas, lead to some loss to a small number of the UK fleet, it would mean an adjustment in fishing patterns more than compensated for with the huge volume of fisheries resources repatriated to the UK.

On average across all stocks, this would represent a 220% increase in the resources available to the UK and the British fleet (see Section 3, page 16).

This colossal repatriation of our own resources will more than compensate for the comparatively smaller losses.

UNCLOS 3 does make a provision in Article 62.3 that a coastal state should minimise economic dislocation.

Article 62.3

...need to minimize economic dislocation in States whose nationals have habitually fished in the zone ...

To that end the UK should notify the EU that all EU vessels will ultimately be excluded from the UK EEZ and provide a **maximum 5 year grace period,** commencing on notification of Article 50 to allow EU vessels to re-adjust to the loss of access to the UK EEZ.

FUTURE ACCESS ARRANGEMENTS

The EU has little to offer the UK and is therefore of little importance to UK strategic fishing interests.

The most important country regarding reciprocal access currently is Norway. Looking to the future the other Nordic countries represent areas where significant mutually beneficial agreements could be drawn.

The UK should enter into non-binding access arrangements with the other Nordic nations through the framework of the NEAFC to facilitate mutually beneficial fisheries agreements whilst not becoming entangled in a rigid structure such as the CFP.

Article 62.2 of UNCLOS 3 makes the provision that a coastal state (the UK) can allow access to its waters for other nations to catch what the state cannot take itself. It should be noted that this is broad guidance and at the UK's discretion.

Article 62.2
Utilization of the living resources

The coastal State shall determine **its** capacity to harvest the living resources of the EEZ. Where the coastal State does not have the capacity to harvest the entire allowable catch, it shall, through agreements or other arrangements...give other States access to the **surplus of the allowable catch.**

TERMS OF ACCESS

Any vessels granted permission to harvest any excess resources should operate under the provision that those vessels MUST land and sell all catches in the UK from the trip in which they fished inside the UK EEZ. This is to ensure compliance and incur benefit from the UK resources being harvested by these vessels.

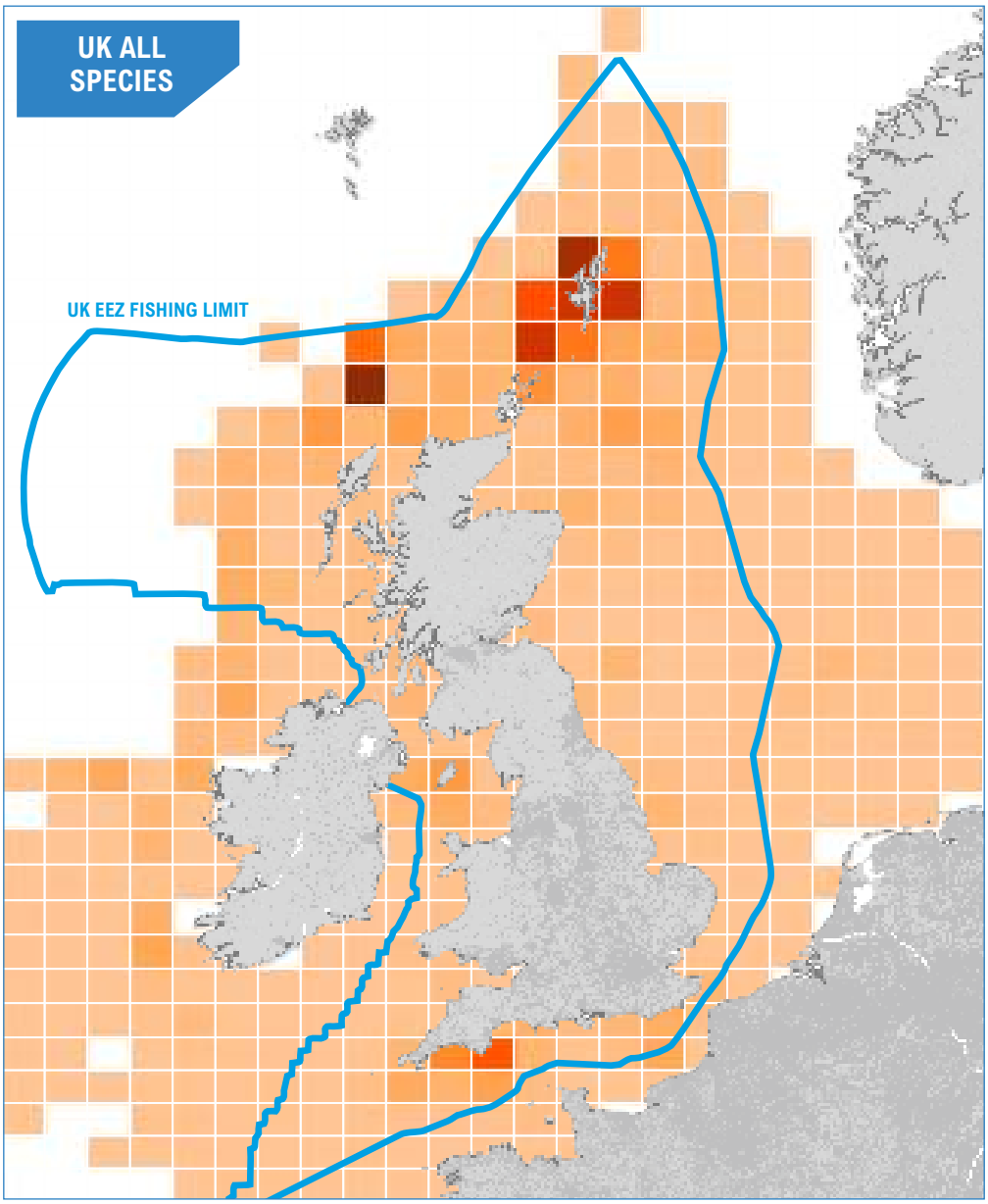
Any vessels granted rights to fish in the UK EEZ to harvest the extra under these provisions of UNCLOS 3 should be made to pay a levy for doing so. Monies raised from this levy should be entered into a fund for new entrants. This will help facilitate the rejuvenation of the UK fleet so as the UK is able to harvest all resources available to the nation within the EEZ.

In summary, the UK has little to lose and a disproportionately high amount to gain from taking back sole control and all rights of access for the UK fleet only. Thereafter, future deals can be pursued in an unbinding framework with the other Nordic nations through the NEAFC.

It is imperative that NO British fisheries resources are traded away spuriously in regard to either fisheries or the wider political context.

The UK fishing industry was regarded as "expendable" during UK accession, with cataclysmic consequences, which resulted in the decimation of the UK industry and communities.

This MUST NOT happen again. In the terms of Brexit this would be a fundamental and dire sell-out and not politically expedient to do so.



This Heat Map shows the majority of the UK effort and catches across all species are caught in the UK EEZ.

Framework of Future UK Governance

Upon withdrawal the UK must implement a new independent UK fisheries policy - unless the opportunity to do so is squandered by adopting the CFP.

For a new policy to be effective and provide sustainable management it must have a sound operational framework and allow the inclusion and integration of all stakeholder.

One of the fundamental failures of the CFP was a top down control structure from an over centralised bureaucracy. One that paid little heed to the unrivalled experience and knowledge of those at the coal face.

CREATE A FAIR FRAMEWORK

A British Fisheries Management policy must have a framework that takes account of and recognises all stakeholders. This must be constituted in a manner to allow all Stakeholders sound checks, balances and recourses.

Future UK governance must recognise fishermen as the primary stakeholders with the greatest interest in sustainability

of the marine environment - the unparalleled expertise of commercial fishermen should be recognised and accounted for.

As food suppliers, commercial fishermen should be preferential stake holders with proportionate numbers to angling, environmental interests and IFCA representation on all policy making.

FISHERIES MANAGEMENT AREAS

Currently effort/entitlement is set by ICES areas and the UK as an independent coastal state will function within this framework through NEAFC.

However, it must be remembered that although fish do recognise boundaries it is of their natural biological habitat/ ecosystem- Not man made lines on a map.

Future UK governance should implement local stakeholder groups which feed the knowledge of specific local ecologies and areas into an overall UK fisheries department.

DELEGATION OF MANAGEMENT TO STAKEHOLDERS –

It is a critical necessity that policy has the necessary engagement and feedback needed to allow a governmental structure to work.

Although future management should be run through a central framework it must ensure due regard to differing geographical and operational issues, to avoid a centralised top down approach, whilst conversely not allow a localised free for all.

Therefore, local stakeholder bodies should act in an advisory capacity and be able to implement and influence management through a central UK fisheries policy; one that is constructed as a bottom up management system rather than a top down bureaucracy issuing edicts from on high.

Although granting entirely autonomous local management sounds good, a multitude of specific small quasi-independent fisheries areas would cause complexity, micro management and divergence resulting in a managerial headache.

Westminster should set overall policy and framework based on the requirements of regional stakeholders who understand the specifics of policy in a defined area.

The Fisheries stakeholders:

- **Fishermen** - They are the primary stakeholders in any fisheries management regime.
- **Scientists** - Their crucial expertise is needed to ensure accurate science to produce sustainable management.
- **Processors**- The processors' input is also essential.
- **Market Managers** - Marketing organisations, salesmen, promotional bodies are all important in any management regime
- **Shore Services** - The service companies are extremely reliant on the success or failure of the industry.
- **Recreational fishermen** - A great many people fish for leisure, making a substantial contribution to local economies. They have a legitimate interest in the management of the resources.
- **Environmental organisations** - They too share a common aim of wanting to see healthy fish stocks in British waters.

Sustainability and Future Science

"It must be recognised fishermen are the stakeholders with the greatest interest in Sustainability - No fish = No fishermen. Fishermen are not environmental pirates as often portrayed."

The UK must manage her greatest renewable resource in an effective, sustainable, equitable and transparent manner, with the full co-operation of all stakeholders, to maximise the socio-economic and seafood production benefits for the nation.

Sustainability is key – the industry has trudged an arduous path to rebuild flourishing stocks against the stupidity of the CFP.

The failed approach of the CFP arrogantly trying to micromanage a vast natural ecology on an annual basis, attempting to meld the environment to the policy, rather than a policy to the environment, must not be replicated.

Stocks fluctuate naturally, it is human arrogance to think we can impose a rigid system of micromanagement. An interactive system is needed that is reactive to the fluidity of the natural environment (see Section 2, page 23).

Future management must be based on Long Term Management plans of 2 - 3 year periods to allow decent stock assessment and secure forward planning for the industry.

A NEW INDUSTRY/SCIENCE APPROACH AND MARINE INSTITUTE

Sustainable fisheries are critical to not only the well-being of the marine environment but also the industry and communities that depend upon them.

This is often forgotten and for too long fishermen have been portrayed as environmental pirates to suit various agendas. The UK fleet has made tremendous innovation, sacrifices and progress to rebuild the booming stocks we have now in spite of the CFP.

Scientific advice is a vital part of any fisheries management regime. However, there is a great deal of concern within the fishing industry about the accuracy of the current science and the limitations of its methodology conjoined with, and causing, poor management systems based upon it.

The UK needs, and Fishing for Leave proposes, a UK Marine Science and Fisheries Institute be created that is properly funded and amalgamates all current scientific institutes into one.

> *"One must recognise the fact that fishery management cannot directly manage fish stocks or their environment; all that it can do is to manage people."*

The model created in Norway facilitated a marine/science partnership that makes fisherman and scientists work and depend on one another with great success and is one which the UK should emulate.

Fishermen and fishing vessels are ready made research/stock assessment platforms - scientists and industry should be made to rely and work with one another to produce accurate stock assessments using accurate real-time catch data from vessels under a Days-at-Sea keep what you catch system.

> *"For too long fishermen's expertise has been ignored and belittled and an environment of mutual distrust has developed."*

Fishermen must be closely involved in the science of stock assessment working with scientists. Fishermen have an important role to play as their experience, knowledge and landings represents an unsurpassed data base.

NEW APPROACH TO DATA

Not only must more accurate science be produced but the system of management must be fit for purpose, allowing both to complement one another.

Currently Quotas and discarding massively misconstrue fish landings and fishing patterns.

Moving to a Days-at-Sea keep what you catch system would give an accurate representation of catches and therefore the fish being encountered on the grounds to produce more accurate science.

With vessels being encouraged and allowed to keep and report what they catch, with reports of catches every 24 hours in electronic logbooks (e-logs), conjoined with Satellite Monitoring (VMS) and Days-at-Sea soak time monitoring, an automated electronic monitoring system database could be built that would correlate this information to provide real time mapping of where what and when vessels were catching.

Such a system in conjunction with scientists being real time observers using fishing vessels as stock assessment platforms whilst working together with fishermen, as in Norway, would produce real time data on stocks.

This information would be far more accurate than the hypothesis generated from mathematical models using old inaccurate data misconstrued by cheating under quotas that is used at present.

CURRENT FLAWS

Currently, ICES is limited by its assessments and estimates of biomass, recruitment and SSB (spawning stock biomass) and by some of its apparently basic assumptions. Its estimates should be accepted as relative, qualitative values, in terms of less than or more than.

It is a fallacy to presume that ICES can predict the exact size of a wild stock to within the 10th ton. The current system of "counting and weighing fish in the ocean" is all but ridiculous. Any pretense to precision is pitiful and any precise assessment figures such as those published by ICES, must be taken with more than a pinch of salt.

Any existing, and future, system can only provide very rough, rather qualitative than quantitative estimates of fish biomass, recruitment, and fishing mortality.

Consequently, a dynamic, fluid system such as Days-at-Sea should aim to balance exploitation with real time observation.

Therefore a UK Marine Institute with an enforced Industry/Science Partnership working in conjunction with a System of Management and Stock Assessment, proposed above, would address the need for better management and better science working in Unison to build a real time accurate system for future sustainable management.

> *"Accuracy cannot be achieved by multiplying estimate by approximate, adding a guesstimate and dividing it all by assumption."*

The reason why Quotas do not work

Quotas are the cause of discards, the main source of the British industry's problems and the crux of the biggest headaches going forward.

Quotas, conservationally and operationally, have failed to work disastrously in the highly mixed demersal fisheries around the UK coast - Quotas are the primary cause of mass discarding.

Individual Single Species Quotas are not fit for purpose in the UK's Mixed Demersal Fisheries- however the industry and scientific establishment have become based on and invested in them ideologically and financially.

The Quota problem originates with science and managers working on an Individual Single Species basis rather than an overall ecosystem basis - such as the pyramid system Faroe and Icelandic scientists advocate (see Section 2, page 23).

Quotas are only applicable to single species fisheries (pelagic – herring/mackerel/etc) but damagingly unsuited to the ecological diversity of the UK's demersal mixed fisheries (cod, haddock, whiting, saithe, etc)

Politicians and scientists fail to understand the fundamental basis of demersal mixed fisheries - it is not specific stocks that are

EU Quotas cause needless mass discarding of prime fish

"Quotas have failed in every aspect for which they were intended including the primary reason of stock conservation. All they have led to is increased mortality for no tangible benefit whilst operationally and financially crippling the industry."

worked (although one species may be preferably targeted) but a productive sea area - the Grounds. It is not a permitted allocation of an individual species that affects fishing mortality but rather the effort exerted in that area.

Instead of developing policy to fit the environment in mixed fisheries, the Quota system is trying to fit the environment to the policy. This has resulted in trying to bash a square peg into a round hole with a plethora of legislative sticky plasters that address the symptoms not the root cause.

Quotas fail to work and are unsuited to mixed fisheries management as they are trying to discriminate in an indiscriminate fishery by managing on an individual species basis when vessels cannot help but catch a mix of fish.

By limiting the allowance by species fishermen are forced to wastefully discard the fish out-with their quota allocation that will be caught anyway.

Quotas have created the crazy situation where tons of prime marketable fish are being discarded as vessels 'sift' through fish to find the mixture of species their quota allocation allows them to retain.

Consequently, this leads to increased fishing effort and stock mortality exerted as vessels have to catch more and land less to find what they are permitted to retain to make viable trips.

As the House of Lords noted in a previous Discards Paper, Quotas are perversely having the opposite effect to which they are intended. They are increasing the pressure on all stocks caused by the extra fishing effort/mortality as fishermen are forced to discard what quotas do not allow them to keep.

Consequently, Quotas have failed in their primary role of stock conservation.

If increased to align with stocks to avoid discarding they have no conservation effect. If decreased they result in more discarding and therefore increased mortality.

Too High = No conservation
Too Low = Worse conservation

The source of the problem is the ideologically flawed approach to mixed fisheries management being on individual species basis approach.

Rather than trying to mitigate the current failed system an ideologically different approach to domestic management that is applicable to the UKs demersal mixed fisheries is needed.

"Quotas in the UK demersal mixed fishery are sole cause of Discards. They are a disaster economically, socially, operationally & conservationally."

To achieve a sustainable, no discard fishery, and to make a diplomatically expedient clean break, the UK must not continue or replicate the EU Quota system which has proved to be a failure in a mixed fishery.

Going forward it is Critical that a British Fisheries Management policy does not continue with a system so unsuited and conservationally perverse to our marine ecology which has been proven to be an abject failure.

Catch Quotas & Choke Species in the Discard Ban

> *"Management must address the cause of discards (Quotas), not ban the symptoms (discards)."*

Catch Quotas are a system to allow a continuation of Quotas whilst complying with a Discard Ban. They result in Choke Species which will Decimate the UK fleet.

Article 15 of the reformed Common Fisheries Policy (EC Reg. 1380/2013) introduces a regulatory requirement for the EU fishing fleet to land all catches subject to catch limits or quotas (Catch Quotas/discard ban).

Catch Quotas/Discard Ban were implemented for EU pelagic fisheries from January 2015. For demersal fisheries, the landing obligation came into force using a phased approach on January 1st 2016, with full implementation by January 1st 2019.

The Discard Ban requires vessels to land all:

- undersize fish (below minimum conservation reference size)
- fish for which there is no economically viable market for
- fish for which the vessel owner has no quota for. This may be because the quota for a particular stock has been fully used up or because the vessel has no quota for a stock.

A significant proportion of the UK fleet fishes in a highly mixed demersal fishery.

Within a mixed fishery it is inevitable, regardless of technical measures to avoid unwanted fish, that over quota fish will be caught.

Currently fishermen are legally obliged to discard undersize fish and those for which they have no quota, however, the Discard Ban means they will be unable to do so.

A Catch Quota/Discard Ban sets quotas as fish caught rather than landed, and therefore a vessel, PO or Area must have sufficient Quota Entitlement to cover all species and fish caught.

When one particular species is exhausted, a vessel or PO must stop fishing, or an area must be closed, to avoid further mortality on this species regardless if there is ample quota for others species in the sea area.

The lowest common denominator species which causes the vessel to stop, or fishery to close, will become a Choke Species.

Species avoidance, selectivity and technical measures can only go so far to avoid unwanted catch in a mixed fishery.

Once fully implemented, unless fishermen can avoid the fish previously discarded, a vessel will choke on a species for which it has or cannot obtain quota and be forced to tie up regardless of other Quota remaining.

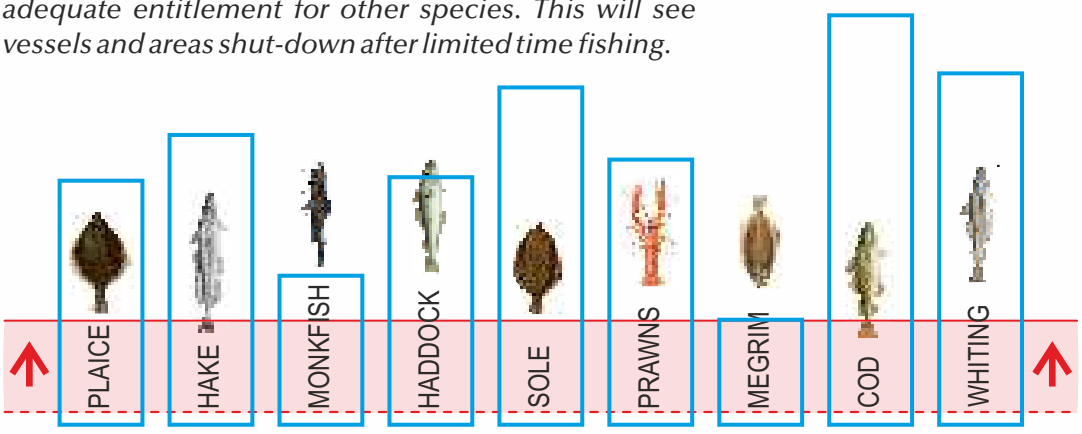
Consequently, Catch Quotas/Discard Ban is a huge threat to the survival of a large proportion of the UK fleet.

As the Seafish Report, *(Landing Obligation Economic Impact Assessment – Final Report, February 2016)*, found a Catch Quota Discard Ban will see 61% of the quota remain uncaught due to choke species.

This will see vessels stopped from fishing, with this loss of earnings having a substantial negative impact on the UK fleet, particularly the prawn fleet.

As illustrated below, when the lowest species allocation is reached, vessels must stop fishing despite having adequate entitlement for other species. This will see vessels and areas shut-down after limited time fishing.

CATCH QUOTA SYSTEM



"Individual Species Quotas are abjectly unsuited to mixed fisheries management as they do not limit a vessel to what it can catch but what it can land. They have no conservation effect as they inherently require mass discarding to function."

QUOTA UPLIFT/REPATRIATED FISH

Quota Uplift allows "extra" fish currently set aside to account for discards to be brought into the catching allocation. This misses the point that regardless of whether the extra tonnage set aside for discards is actually landed or theoretically discarded at sea there is a huge number of species which have insufficient quota to allow a full year fishery for vessels and/or areas.

With science lagging out of line to the prevalence of fish, current quota allocations over a multitude of species will be eroded rapidly when vessels are forced to account for all fish caught.

Example - North sea Cod has a desperate shortage of quota - on the West Coast of Scotland the problem is acute. There is a proliferation of North Sea Hake and Celtic Sea Haddocks yet no sizeable historical track record and quota for them. These species, under current rules, will choke entire fisheries in these respective areas when the meagre quotas are exhausted and vessels will suffer tie ups.

Regardless of repatriated fish, under zonal attachment or quota uplift, increasing the Quota available – there is still insufficient quota for a large range of species.

In the context of individual vessels, the majority of the UK fleet has only small entitlements of fish quota.

The UK prawn fleet developed from vessels displaced from traditional pursuit of whitefish to pursuing prawns as an alternative fishery with fish forming a supplementary catch.

Quota Uplift for those vessels will see a one hundred percent increase on their current allocation of zero, still equalling zero! Consequently a fleet built up on diversification away from fish will be eradicated.

The Catch Quota system was originally proposed by a few individuals who believed a CCTV monitored Catch Quota system would release the "extra" tonnage of Cod set aside by scientists to account for Discards – called Quota Uplift.

This minority were either "Slipper Skipper" Quota Renters or had sufficiently large Cod Quotas to allow a year long fishery of Cod to avoid Cod impinging upon them by becoming a choke species. When the publicity campaign against Discards saw the system extended to include all species the industry became trapped.

FASTER CLOSURES / PROHIBITIVE RENT

When all species must be accounted for, quota will be exhausted faster than currently, extra quota or not.

As more and more fisheries are choked there will be a rapid displacement of vessels into a declining number of fisheries. These will close at an exponential rate as more effort goes into an ever declining number of fisheries and areas.

Quota rental costs will increase astronomically to extortionate levels in a desperate scramble for quota, if available, to remain fishing. Vessels will be forced to rent quota at uneconomic levels for

particular species to remain fishing for the rest of their allocation – resultantly a large proportion of the fleet will be forced out the industry.

LIMITS OF SELECTIVITY

Although fisheries managers propose greater gear selectivity to avoid choke species there is no design of trawl that can provide selectivity for all the species encountered in a mixed fishery. It is impossible to design a net to catch only those species which a vessel has quota.

Although vessels can adapt and increase selectivity to a degree to avoid particular species this impinges upon their profitability due to the loss of species.

MITIGATION MEASURES

Due to vested interests trying to mitigate the symptoms (the Discard Ban), rather than address the cause, that Quotas don't work in a mixed fishery, there have been mitigation measures proposed which amount to rearranging the chairs on a sinking ship.

Inter-species flexibility - this proposes to allow one species to be caught under the tonnage of another. One must ask if species can be transferred in such a manner, what is the point of a Quota in the first place?

Bank and borrow - this mechanism would allow operations to utilise Quota from the following year to cover for overshoot in the current. This amounts to robbing Peter to pay Paul whilst merely deferring the inevitable closures to subsequent years.

Quota uplift - proposes that with greater vessel and catch monitoring Quotas will increase to be in line with stocks. With vessels being able to only catch so much per year, aligning quotas to allow a full year fishery has no conservation effect as it is equivalent to allowing vessels to fish unlimited in a free-for-all.

Put bluntly, Catch Quotas will devastate a vast majority of vessels and ports. It will see an unnecessary contraction and consolidation of the fleet into a few hands. Caused by an operationally unfit quota regime, fundamentally unsuited to mixed fisheries, this at a time when stocks are recovering strongly or booming.

Most in the industry won't and can't survive a Discard Ban with Catch Quotas. Therefore, rather than continue down the road of a fundamentally flawed management system that is inapplicable to the UK's demersal mixed fisheries, the government must look to transition to a new management system that ends the cause of discards rather than ban the symptoms; a management system that limits overall effort whilst allowing vessels to catch less but land more, eliminating discards – that system is Days-at-Sea with catch compositions (see Section 2, page 35).

Seafish: Landing Obligation Economic Impact Assessment – Final Report, February 2016
http://www.seafish.org/media/Publications/Seafish_LOEIA_Final_Report_290216.pdf

Ecological Basis of Days-at-Sea

> *If quotas work why continual reductions? Stocks fluctuate naturally, it is human arrogance to think we can impose a rigid system of micromanagment. What is needed is an interactive system that is reactive to the fluidity of the natural environment.*

A mixed fisheries eco system must be managed as one stock of interdependent species.

Currently, management is based on an individual species approach which is ill founded. Stocks are in an interdependent ecology, and imagining a maximum of everything ignores their interdependence, and our inability to predict and selectively fish accordingly.

Politicians and scientists fail to understand the fundamental basis of demersal mixed fisheries - it is not specific stocks that are worked (although one species may be preferably targeted) but a productive sea area - the Grounds.

It is not a permitted allocation of an individual species that affects fishing mortality but rather the effort exerted in that area.

To be sustainable the only way to approach and manage a mixed fishery ecology is on an ecology wide basis, treating a mixed fishery as one overall stock of fish. Managing stocks as a whole(a mix of species), not as individual blocks (single species) with quotas that destabilise the marine eco system and cause mass discarding.

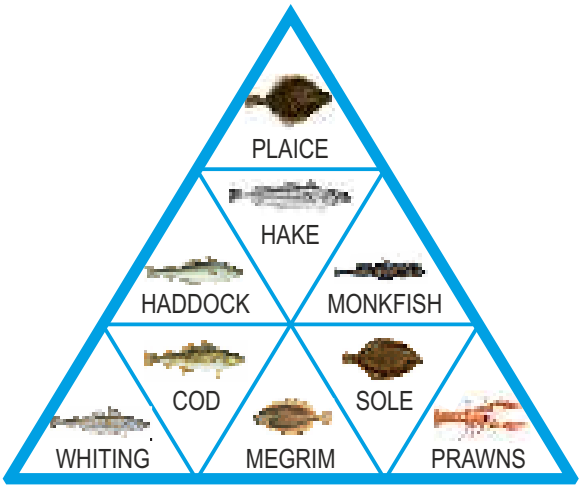
Within such an approach it is overall effort on all stocks that should be limited. Not individual species that will be caught anyway and wastefully discarded.

The only sensible and properly effective way to limit overall fishing mortality in a mixed fishery is to limit the overall effort on an area in fishing time in conjunction with technical measures whilst allowing catch flexibility out with rigid quotas.

This reduces vessels overall catches as they can catch less but land more reducing overall stock mortality.

ECOLOGICAL BASIS OF DAYS-AT-SEA

The UK should look at the Faroese pyramid model. This shows that rather than treat each stock separately we should see the marine environment as a whole .



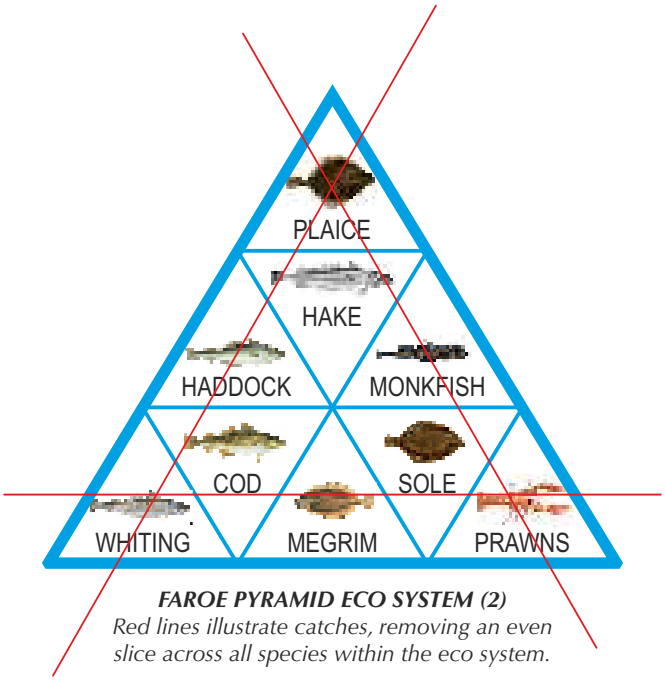
FAROE PYRAMID ECO SYSTEM (1)
A mixed fishery ecosystem resembles a pyramid of interdependent species.

To be sustainable, a mixed fishery ecology must be treated as one overall stock of fish.

Faroe operate a Days-at-Sea system based on this concept that an ecosystem resembles a pyramid of interdependent species.

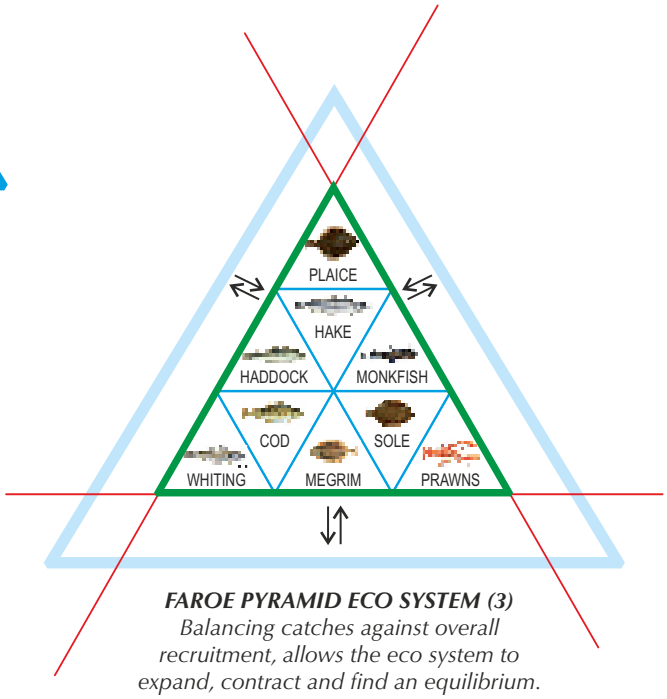
Therefore, rather than remove individual blocks destabilising the pyramid (ecosystem) we should aim to take an even slice down the side of the pyramid across all species and sizes.

A slice across all species allows the ecosystem to be harvested uniformly, under keep what you catch, to maintain an ecological balance.



FAROE PYRAMID ECO SYSTEM (2)
Red lines illustrate catches, removing an even slice across all species within the eco system.

Using Days-at-Sea to balance effort against recruitment allows the pyramid ecology of all species to expand-and-contract at an ecologically sustainable level. to expand and contract like a set of lungs – to breathe.



FAROE PYRAMID ECO SYSTEM (3)
Balancing catches against overall recruitment, allows the eco system to expand, contract and find an equilibrium.

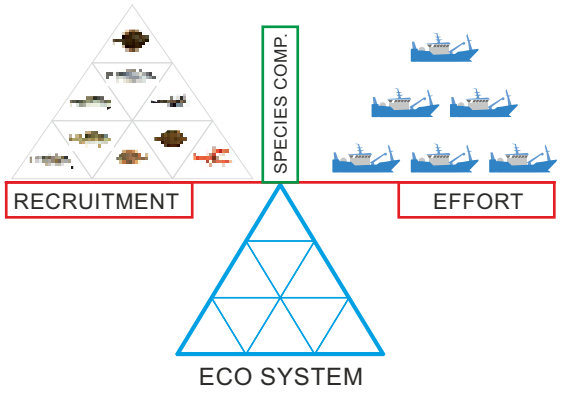
Example: a sea area sustains 1million tons of fish – 200,000 tons can be removed to balance catch against recruitment. 200 vessels have the catching capacity of 5tons per day = 1000tons/per day. To hit this overall extraction of 200,000 the fleet needs 200 days per vessel.

Approaching fisheries management in the manner detailed above utilising a management of Days-at-Sea facilitating keep what you catch – catch less, land more - allows accurate real time data (see Section 2, page 14).

- If total advisable extraction levels are reached before days-at-sea limits are reached, then stocks are abundant allowing a safe increase in fishing effort
- If total advisable extraction levels are not reached within the time limit then stocks are scarce and effort should be cut, or areas closed, until landings outrun time again.

This system operates like a set of scales, balancing effort against recruitment. Using the real time data recorded, to create an equilibrium, maintaining sustainable stocks and maximum yield from an eco system.

Management can feather the overall effort through small reductions in overall days, temporary closures or utilise flexible catch composition percentages to provide a fine-tuning mechanism for certain species as proposed in Fishing for Leaves Days-at Sea Mechanism catch composition percentages (see Section 2, page 27).



ECO SYSTEM BALANCING
Ecology wide effort-control allows an equilibrium of recruitment versus effort with flexible catch compositions allowing fine-tuning for particular species.

Future UK policy must be based on sound first principles. It must manage an area of stocks as a whole ecology to maintain the ecological balance of the environment rather than an individual species approach with quotas removing destabilising chunks of particular species and adding extra pressure through discards.

> *"Fish stocks should be managed as a renewable resource and aim for a maximum exploitation yield from a sea area."*

Days at Sea allowing keep what you catch would facilitate this whereas quotas ecologically fail in a mixed fishery as they are trying to remove individual "chunks" from the ecosystem which unbalances it.

Forcing fishermen to target specific stocks and sizes results in excess effort as vessels have to catch more and land less whilst discarding to find what they can keep. Quotas cause inaccurate reporting and poor science- it is a downward spiral of bad data, bad allocations and mass discards.

Consequently, a Days-at-Sea system is the only way to limit effort when you are catching a variable mix of species.

Days-at-Sea - Fit for Purpose UK Management

> *"A Days-at-Sea UK fisheries policy would end the cause of discards (quotas) not ban the symptoms with a discard ban that will decimate the fleet with choke species."*

UK must transition from the ecological and operational Disaster of EU Quotas to an Alternative Days-at-Sea system.

Unless the opportunity of withdrawal, to regain and repatriate all UK waters, and all our resources, is squandered then, with a clean slate, the UK government must decide what to do next.

To diplomatically ensure repatriation of all resources, allow rejuvenation of the industry and to avoid a calamity with the discard ban, the UK must look to a new fisheries management regime.

An environmentally and economically fit for purpose policy that is inclusive of and benefits all in the industry must be implemented. Future policy must create firm foundations which allow for economic vitality and sustainability to provide a future to allow a rebuilding of a home grown, community based industry all around the nation.

"Rather than trying to mitigate the current failed system, with a plethora of regulations, a new angle of approach for mixed fishery management is needed."

A future fishery management regime must have sustainable foundations and fit the ecology of the UK's mixed demersal fisheries.

As outlined previously, the failed EU system of quotas does not work in mixed fisheries and is the cause of discards.

The UK must transition to a Days-at-Sea, keep what you catch system. Days-at-Sea, founded on ecologically sound first principles work with the ecology in a mixed fishery (see Section 2, page 23).

Politicians and scientists fail to understand that in UK demeral mixed fisheries it is not a specific species that is worked (although one species may be preferably targeted) but a productive sea area - the Grounds.

It is not a permitted allocation in kilograms dreamt up on a piece of paper that affects fishing mortality, with the exception of ironically increasing it by causing discards, but rather -

- the number of boats
- the number of nets in the water
- the amount of time said nets are actively fishing.
- the retaining efficiency of the nets.

Therefore, the only sensible way to limit fishing mortality in a mixed fishery is to limit the effort on an area in fishing time days/hours, in conjunction with technical measures, whilst allowing catch flexibility out with arbitrary kilogram quotas to end discarding.

SOLUTION - DAYS AT SEA/TECHNICAL MEASURES

Days-at-Sea should be the primary limit of fishing effort - it should aim to be a keep what you catch system.

A Days-at-Sea, keep what you catch system, would facilitate catching less but landing more - this reduces stock mortality with catching less whilst increasing fleet profitability by allowing landings of all catches for less time needed at sea discarding to match quota allocations.

The economic objective of each vessel is to catch and retain all fish as efficiently as possible- a Days-at-Sea system works in harmony with this economic truth unlike quotas.

"We must achieve catching less but landing more."

Therefore, when afforded the opportunity to keep what you catch, discards will automatically end overnight.

Landing everything caught will give a more accurate reflection of stocks (taking account of those fish avoided with technical measures) – feeding into improved real-time science (see Section 2, page 11).

Days-at-Sea is simpler to administer and would reduce the burden of enforcement on government as Days-at-Sea removes the need to misreport and cheat and the need for a complex system of Quota enforcement.

Days-at-Sea allows the integration and incorporation of technical measures

through a Conservation Credits Scheme which would incentivise adaptation and adoption of selective measures and species avoidance by awarding extra days.

Economically Days at Sea would act as an equalizer by bringing all vessels under the one management regime and allow for a demonetarization of fishing rights ending the chronic financial predicament the industry has become mired in.

However, a Days-at-Sea must incorporate two things for financial and managerial stability-

1 It must allow the retention of the FQA units that underpin current investments by businesses and banks to give financial continuity.

2 Days-at-sea must provide a flexible mechanism to discourage vessels from certain high value or vulnerable species to avoid a free for all, whilst allowing retention of all fish that are an unavoidable overshoot.

Implementing Days-at-Sea, with a mechanism to allow individual species discouragement avoids the allocation being set to protect the lowest common denominator species. The later approach would negate the principle point of Days-at-Sea allowing an ecology wide approach.

Retention of FQA units and the need for Species deterrents can be integrated into an overall Days-at-Sea framework.

The current underpinning of the industry is a British system of FQA units not the actual EU Quotas.

Consequently, FQA units can be transferred and incorporated into a flexible mechanism, based on current FQA allocations/use, within the Days-at-Sea regime to allow the retention of the British FQA units to placate industry fears of their loss.

This system is detailed in Section 2, page 35.

“A new British regime can neither reward the haves nor the have nots - it must take the industry forward together for a new start.”

Days-at-Sea only for Demersal mixed fisheries

It should be remembered that although Days-at-Sea is the only system to sensibly and adequately manage the UK's unique demersal mixed fisheries, it is not applicable to other fisheries.

Pelagic - due to the pelagic industry (herring, mackerel, etc) targeting species which shoal individually, these fisheries can be adequately managed with the current system of quotas and should continue to be so. However as Fishing for Leave advocates, current allocations should be respected for business stability, but all repatriated resources should be administered through a Government pool. These resources should be allocated across the whole industry on a pro-rata basis to benefit all, from the largest pelagic vessel, to the smallest in the fleet.

Shellfish - the UK has a predominant shellfish fishery for crabs, lobsters, Queen and King scallops. Much of this fishery developed from vessels and skippers displaced from their traditional pursual of demersal mixed fisheries. This sector, with its continued sustainability and success, illustrates that a light regulatory system is a more pertinent approach to fisheries management, in contrast to the bureaucratic failure of the approach currently applied in the UK's demersal mixed fisheries. Therefore vessels in the shellfish sector should continue with the similar, but improved, current system.

Future UK management incorporating a new system for demersal mixed fisheries, and continuing the current systems which are applicable to the pelagic and shellfish sectors, will allow the UK fleet to revert to pursuing various fisheries in line with the environment as they previously did.

The current EU CFP regime has needlessly pigeon holed segments of the industry, such as the inshore fleet, into particular fisheries, resulting in over exploitation of species and areas, and negating the ability for progression of businesses and future generations.

Track Records and FQAs

Vested Interest Problem

The Catch 22 moving forward is the industry has had no option but to invest in the current system to survive in the dire situation it has been placed within the CFP.

Businesses and investments have become based on the current failed system and therefore a sizeable minority are petrified to countenance moving away from the "devil you know" to a more environmentally and economically fit for purpose system in a UK management policy.

Resultantly many papers produced by the industry thus far have advocated nothing more than continuing with the status-quo. This would be economic, environmental and diplomatic folly to do so and would squander the opportunity to rebuild and rejuvenate UK fishing as a beacon of the success of Brexit.

The primary reason of Quotas being the biggest headache is that the UK industry has invested heavily in entitlements to them. However, it is a common misconception that Quotas are a British system or an international given – they are not.

Quotas are an entirely EU construct and mechanism to provide a method of dividing out the internationally agreed Total Allowable Catches (TACs) of fisheries resources the EU subsumed from Member States (see Section 1, page 27).

It is also misunderstood that it is not EU quotas the industry has invested in but the British system of Fixed Quota Allocation units. FQAs were implemented as an entitlement system within the UK industry to share out the slice of EU quota the UK receives of its own resources.

Consequently, as it is the FQA units the industry has invested in, and as these are entitlements, they can be transposed or converted to denote share outs to any particular method of management whether Individual Species Quotas (as currently) or Catch Compositions as Part of A Days-at-Sea system (see Section 2, page 35).

The British government allocated shares of EU Quotas using an FQA units system. Allocations were set on a reference period of 2 years (94-96) based on landings. 10 FQAs initially designated 1 tonne of a particular species to a vessel. FQAs remain constant as the EU Quota is cut.

Therefore, as the EU Quota is cut the ratio of FQAs to Tons changes (i.e. 10FQA = 1 tonne. A 50% cut gives- 10FQA = 500kg).

As the Quotas were cut vessels had to invest in or rent more FQAs to remain at a constant viable catch level of quota.

Consequently the industry has been forced to invest and base itself on a flawed and hated system of EU Quotas which are conservational and economic madness.

Accordingly there has been a consolidation of FQA units onto fewer boats as profitability and/or viability is being bled away in trying to maintain FQA parity to remain fishing.

This has caused industry stagnation by chasing a diminishing resource which has become financially inflated through scarcity.

It has become a race to the bottom financially whilst conservationally a lack of quota has caused a ludicrous situation of discarding ever more amounts of fish unnecessarily as booming and changing stock dynamics outstrip Quota levels.

The progression of persisting with trying to make a flawed system work has been thus-

1 **Theoretical quotas (1996/2002)** - resulted in illegal "black fish" landings by fishermen rather than discard prime marketable fish. The UK, with a poor share of her "own" resources under an EU quota system and relative stability had "too many boats chasing too few fish(quota)"

2 **Landing Quotas (2002-2016)** - mass enforcement and a plethora of rules resulted in over quota fish being discarded en-mass - vessels invested heavily in quota to keep going or became unenviable and quit (decommissioning schemes '02/'03/'10)

3 **Catch Quotas/Discard Ban (2016 onwards)** - quota will be set as fish caught rather than landed. However in a mixed fishery it is impossible to work to a pre-defined catch composition - technical measures can only go so far. Catch Quotas/Discard ban will see the ruination of the fleet as vessels are shut down on the lowest common denominator species of quota - 'Choke Species'.

A majority of species have Quota uptakes running at 100% - there is no slack/spare in the system to cover extra fish or there wouldn't be a discard problem

Each of the progressions has been banging a square peg into a round hole- changing the methodology of enforcement (the hammer) isn't going to make the peg fit.

The only way to stop discards is to remove the cause which are quotas in a mixed fisheries.

IT IS A SIMPLE EQUATION

Quotas + Boats = Discards

The only way to stop discards is to remove quota or remove boats.

We must address the cause (quotas) rather than the symptoms (discards) whilst underpinning the financial structure that the industry has become based upon- FQAs. Fishing for Leave proposes converting and integrating FQA units into a Days-at-Sea system (see Section 2, page 35).

"With fish stocks flourishing because of the lack of boats a further diminution of the fleet would be both illogical and perverse."

It doesn't matter under which system vessels make a return on their substantial investments but so long as they do so with a degree of security.

Short sighted influences in the industry who have become quota blinded cannot be allowed to jeopardise the golden opportunity we have for a decent UK Fisheries management regime suitable for fish and fishermen- government and industry must look to the next 40 years not 4.

The UK cannot afford diplomatically, environmentally or economically to replicate the CFP as is- that would be a tragedy - we must look to the long term wellbeing of an industry and the Nation's greatest natural resource that is critical for national food security and coastal communities.

Quota rent - killing industry

Quota rentals have a seriously detrimental impact on the profitability and liquidity of fishing businesses.

As detailed in the table below, using analysis from the Seafish Fleet Economic Survey, the situation that has arisen of Renting Quota is a serious impediment on the financial well-being of the UK Fishing Industry.

This will only become worse with the implementation of Catch Quotas / the Discard Ban, which will increase the necessity of vessels to acquire sufficient Quota to remain fishing and solvent.

The current situation is bleeding the profit away from active fishing vessels and family operations whilst causing a consolidation of the industry into fewer hands, caused by the political situation rather than economic evolution. This is stifling new entrants, and the development and progress of current fishing businesses.

Figures are a four year average, 2012 - 2015	WHITEFISH (NS & WoS)	PRAWNS (NS)	WHITEFISH (IS)	WHITEFISH (SW)
Active vessels	146	120	8	77
Average price per tonne landed	£1,553	£2,399	£1,330	£2,032
Average Quota lease costs per tonne landed	£202	£106	£77	£180
Quota lease costs as share of average fish price	13%	4%	6%	9%
Average Vessel Fishing Income	£1,013,000	£300,000	£143,000	£465,000
Average Vessel Quota Leasing costs	£132,000	£13,000	£9,000	£40,500
Average Vessel Quota Leasing income	£9,000	£3,000	£200	£300
Non Fishing Income	£75,000	£18,000	0	4,300
Average Vessel Total Operating Costs	£932,000	£289,000	£124,700	£424,300
Average Vessel Operating Profit	£166,000	£32,000	£19,000	£45,000
Fleet Segment Total Quota Costs	£19,277,000	£1,575,000	£68,000	£3,118,500
Fleet Segment Total Quota Earnings	£1,284,000	£309,000	£1,600	£23,100
Fleet Segment Net Quota Costs	£17,993,000	£1,266,000	£66,400	£3,095,400
Quota Costs as Percentage of Operating Costs	14%	5%	19%	10%
Quota Costs as Percentage of Total Profit	44%	29%	31%	48%
Quota Costs as Percentage of Fishing Profit	59%	48%	31%	50%
Crew share	£13,000	£2,000	£1,000	£5,000

As shown above, using Irish Sea Whitefish, South West Whitefish and North Sea Prawn and Whitefish Fleet as examples, although superficially large landings show the industry doing well, structurally 44% of the potential profit of the North Sea and West Coast Whitefish Fleet is being bled away renting Quota, with the figures being 48% for the South West Whitefish Fleet, 31% for the Irish Sea Whitefish Fleet and 29% for the North Sea Prawn Fleet.

The £24 million being expended on Quota costs after, inter-vessel exchanges are accounted for, shows that a select number of "slipper skippers" and Quota renters are profiting massively on the back of the industry. These vested interests constitute the main resistance to the UK moving away from Quotas.

Implementation of Days at Sea

Days-at-Sea, with Flexible Catch Composition Percentages, converts FQAs for financial and managerial stability and allows individual species control - avoiding management by the lowest species.

Days-at-Sea are an ecologically sound policy that addresses the fundamental problem that Quotas are ecologically and operationally unfit for purpose in the UK's demersal mixed fisheries.

However, a Days-at-Sea must incorporate two things for financial and managerial stability-

1 It must allow the incorporation of the FQA units that underpin current investments by businesses and banks to give financial continuity.

As the industry has invested in FQA allocations - not the quotas themselves - a way to change allocations from arbitrary kilogram quotas to be expressed in a days-at-sea effort regime must be provided.

2 Days-at-sea must provide a flexible mechanism to discourage vessels from certain high value or vulnerable species to avoid a free for all, whilst allowing retention of all fish that are an unavoidable overshoot.
Implementing Days-at-Sea, with a mechanism to allow individual species discouragement avoids the allocation being set to protect the lowest common denominator species. The later approach would negate the principle point of Days-at-Sea allowing an ecology wide approach.

Retention of FQA units and the need for Species deterrents can be integrated into an overall Days-at-Sea framework by converting FQA units from being entitlements for kilogram quotas to entitlements for 'Flexible Catch Composition Percentages'.

FLEXIBLE DAYS MECHANISM

The current underpinning of the industry is a British system of FQA units not the actual EU Quotas.

To allow a transition of FQAs from quotas to being incorporated in Days-at-Sea, and to protect high value species from excess exploitation, Fishing for Leave proposes transforming FQAs from being expressed as an arbitrary kilogram quota allocations to a flexible catch composition percentage.

> ***EXAMPLE*** *If a vessel had Total 500 tonnes of quota and 100 tonnes was Cod then 20% of this vessels catch may be Cod. By converting FQAs from kg quotas to catch compositions the vessel still has allocations to catch 20% Cod but it is a composition of total catch taken in the mixed fishery.*

To deter a free-for-all on certain species and to maintain individuals FQA investments –

- FQAs are converted to be expressed as a Flexible Catch Composition Percentage of a vessels overall catch rather than fixed kilogram quotas.
- Flexible Catch Composition Percentage would be based on vessel landings over previous years (5-10). Taking account of FQAs owned and rented, returns all fishing entitlement to the catching sector, eliminating 'slipper skipper' quota renters.
- Resultantly, if a vessel had an allowance of 30% Cod or 20% monks they can retain up to this percentage, maintaining operational stability and fleet distribution
- To stop discards this percentage is flexible - if exceeded the vessel needn't discard and may keep what it catches by sacrificing time at sea to compensate; time not needed as a successful catch is aboard.
- Vessels may land everything caught, but the system acts as a deterrent to avoid particular species, under biological pressure, or a free-for-all on high value species.
- Should vessels exceed their flexible catch composition percentage they incur time penalties of hours or days from their monthly allocation on a gradated basis. This creates an incentive to avoid species spacially or technically whilst removing the regulatory obligation to discard to meet quota limits.
- Conversely, vessels avoiding particular species, areas, or adopting selective measures, will be awarded extra days through a system of Conservation Credits,

If a vessel catches too much of a species it is discouraged from pursuing, this system provides the flexibility to retain it. However, if a vessel belligerently goes "free for all" his fishing effort is reined in by a loss of time at sea – balancing the "wrong" type of species mortality with loss of effort to avoid further mortality.

This is a positive feedback loop system which would allow the retention of FQAs and the allocations they denote whilst ending the cause of discards whilst moving to Days-at-Sea.

This system acts like a multi-dimensional set of scales, providing not only fine adjustment on particular species deterrence by balancing catch composition against effort, but integrates with the overall ecological principle of Days-at-Sea.

This system balances overall Days-at-Sea catch effort against total demersal mixed fisheries recruitment in an area, whilst also providing incentives through flexible catch composition percentages to fine-tune individual species.

EXAMPLE If a vessel exceeds its flexible catch composition percentage for Cod it is permitted to land it but has an incentive to avoid Cod to avoid being penalised by loss of effort (hours/days). The flexibility is provided to balance the financial benefit between the fish caught or the days lost by retaining them. Currently vessels must discard to comply with arbitrary kilogram quotas. Rather than having an arbitrary catch limit in kilograms that causes discards, the flexible catch-composition percentages within this Days-at-Sea scheme act to discourage vessels from pursuing species they normally do not target but allows keep what you catch in a mixed fishery.

“Flexible Catch Compositions allow for curbing discards at the same time as having a deterrent from certain stocks.”

This system allows a vessel flexibility to balance species composition against time at sea to make a viable trip whilst deterring a free for all on high value species or niche fisheries.

This system allows landing more for catching less increasing profitability. Any loss of days incurred by breaching percentages is negated by landing everything caught in a shorter time at sea

Although there are species deterrents in the form of time penalties, discards shall still not occur as if species are retained causing a loss of days this loss is irrelevant as the vessel has its trip in.

These percentages should only be applied to high value species, such as monkfish, cod and soles, so as to prevent a free for all taking place on them, or those species stocks of which are in poor ecological condition. Days-at-Sea should aim to allow an even harvesting across all species encountered in a mixed fishery ecology.

CONSERVATION CREDITS

A system of Conservation Credits can be incorporated to work in conjunction with a Days-at-Sea system. This system would award additional days to encourage particular conservation efforts. Allowing management to work as a carrot rather than a stick.

Species avoidance - by being below a certain catch composition percentage of a particular species (i.e. less than 2% Cod)

Technical Measures – any adaptations and selectivity measures above the minimum UK standard would gain extra days to act as a stimulus for gear innovation and selectivity measures.

Temporary Closures – a system of non arbitrary temporary closed areas could be implemented where vessels could be discouraged from a particular are by an award of days for fishing out-with it.

ALLOCATION OF DAYS

All Days-at-Sea should be allocated to individual vessels as an entitlement of their licence. They should be non-transferable to avoid replicating the bingo system of quota trading.

As stocks are increasing the fleet is in line with stocks in spite of extra effort from discarding.

Therefore, whitefish vessels should be allocated at least 200 days and prawn vessels 240 days. Thereafter this can be altered on the basis of stock assessment within a long term 2-3 year management plan. It is crucial to note that any necessary protection of vulnerable stocks is provided by flexible catch composition percentages, technical measures and temporary closures.

DAYS-AT-SEA FACILITATES A RESOURCES AMNESTY

Current allocations should be recognised and preserved for business stability. However, all resources repatriated to the UK upon withdrawal should be held in a government pool to be distributed across the whole industry for the benefit of all. Fishing is a people's resource, one that belongs to this Nation (see Section 2, page 49).

Days-at-Sea acts as an equaliser across the fleet and ends the ever-corporatized situation where fishing rights will eventually end up in the hands of few, accelerated by Catch Quotas/Discard Ban one that is destroying our fishing communities and heritage (see Section 2, page 19).

> *"Catch compositions are based on track records of FQA units previously landed (i.e. owned and rented) this acts as re-referencing and eliminates "slipper skippers" (quota renters)."*

TIMING OF DAYS

All Days-at-Sea would be measured in hours to allow flexibility for daylight/dark fisheries, weather and distance of grounds. This accommodates all non-sector, non-nomadic vessels working from the beach, tidal harbours, rivers, inlets and main ports.

Time at sea would be measured as soak/fishing time and not judged on the 'harbour to harbour' time.

Soak time can be monitored using electronic sensors to monitor gear deployment. This information could be integrated into electronic logbooks to show when a vessel was fishing and what it was catching and where.

An alternative is that upon notifying departure in the electronic logbook a vessel enters the time, location and transit time it intends to start the clock fishing. If a vessel is not within this predetermined area within the transit time offered an alarm is triggered to alert that the vessel is fishing 'in transit'. This works in reverse when coming ashore.

Soak Time allows vessels to operate -

Sustainably – By allowing vessels to spread out over a wide geographical area to desired fishing grounds avoiding targeting of fish on inshore grounds.

Safely – Vessels can fish at optimum times. Vessels do not feel compelled to avoid losing time running for shelter or dodging.

Economically – short trips can be worked to improve catch quality without losing days steaming in to land.

The commencement of the administrative fishing year should be moved to April/May. This would allow fishermen to commence fishing into the summer and winter when fish are at their best and avoid fishing at spring spawning time.

AVOIDING LOWEST COMMON DENOMINATOR

Flexible Catch Composition Percentages allow species deterrence within a mixed fishery approach of keep what you catch negating managing effort allocation a single species lowest common denominator basis by allowing managers and scientists some control to encourage/discourage species avoidance/targeting.

A Days-at-Sea Flexible Catch composition percentage allows stocks to be managed through the ability to rein in fishing effort through 4 measures which are effective conservation limits-

- Adjusting flexible catch composition percentage
- Adjusting technical measure
- Temporary Closures of Areas
- Adjusting Overall Days (last resort)

"Flexible Catch Compositions allow a vessel to discard no marketable fish, whilst catching less overall tonnage whilst spending less time at sea for a greater profit."

Principles of FFL's proposed Days-at-sea/Flexible Catch Composition Percentages system are:

- Removes the cause of discards facilitating 'catch less land more'.
- Decreases overall stock mortality. Although landings will increase, vessels will be landing more but catching less.
- Improves sustainability as it protects stocks, protects species and stops discarding of marketable fish.
- Keep what you catch allows accurate catch recording providing accurate, real time data for better stock assessment and fisheries science.
- Preserves FQA track records and the investment in them - converting FQAs to flexible catch composition percentages from arbitrary kg quotas.
- Increases profitability by landing more in value for less time incurred whilst eliminating quota rent and purchase.
- Encourages adoption of technical selectivity measures by awards of days or vessels staying within catch composition limits to avoid loss of days.
- Negates any "race to fish" for a particular species by reining-in those who do so with a loss of time at sea

Exemption of Under Tens

The proposed Days-at-Sea UK fisheries management system should exempt all smaller vessels from flexible catch composition percentages.

Days-at-Sea with flexible catch compositions acts as an equaliser that puts all vessels on the same system. This alleviates all the problems associated with quota management and consolidation.

However, within this proposed Days-at-Sea UK fisheries management system any smaller vessels (under 10 or kw/gt) should be exempted from the flexible catch composition percentages. These vessels would only be limited by their overall Days-at-Sea (measured in hours/soak time) and by technical measures and temporary closures under an effort reward system of Conservation Credits.

FFL FEELS THIS EXEMPTION IS IMPORTANT DUE TO FOUR REASONS -

1. With smaller vessels operating on a low volume of catch, applying a catch composition percentage would be inapplicable - with small catches of 500kg, the difference of 10 or 20% amounts to a few boxes of fish.
2. Smaller vessels have a limited ecological impact and limited catching capacity, resultantly a small vessel going "free-for-all" has limited ability to significantly impact on overall stocks and species.
3. Small vessels have limited range – inhibiting them with a catch composition percentage would deny them the flexibility of spreading effort across a multitude of species. Markets and catches generally dictate these low volume fishing operations.
4. Small vessels are a nursery for young fishermen and vital to local communities, providing a low impact sustainable living for smaller coastal ports. Disproportionate regulation stifles these vital local fleets and communities.

Allowing this exemption would be a common sense measure to free the government from unnecessary regulation and allow the small, coastal harbours around the UK to regenerate, through each having a small local fleet. It would facilitate vibrant communities, massively benefiting the tourism industry.

Trial of Days-at-Sea

An Outline of a trial of Days-at-Sea as an alternative management system to provide an ecological and operational fit for purpose independent UK fisheries management policy.

Quotas are both ecologically and operationally fundamentally unsuited to UK mixed fisheries. In conjunction with a discard ban and the progression to Catch Quotas they will result in an unnecessary cataclysmic decimation of the UK demersal fleet.

The UK should transition to a Days-at-Sea system, with flexible catch composition percentages, as an ecologically and operationally viable alternative management system to replace the quota systems as the main mixed fisheries management tool.

A trial of Days-at-Sea with flexible catch composition percentages should be instigated to examine, refine and prove the feasibility of the system proposed as an applicable alternative for management of the UK's demersal mixed fisheries.

Days at Sea with flexible catch composition percentages can deliver the desired targets of sustainable fisheries management. **Those targets being-**

- a reduction/elimination of discards
- reduce overall fishing mortality
- increase fleet profitability.
- improved science
- maintain industry financial stability

In achieving the above, it will ensure the survival and regeneration of the UK fleet and coastal communities. It will negate the need of further fleet reductions with Catch Quotas and the consolidation of the UK fleet into few hands which a minority find convenient for their own selfish vested interests.

SCOPE OF TRIAL

A trial should be implemented nationwide and conducted in each major fisheries area. Vessels should be put onto a trial of Days-at-Sea with flexible catch composition percentages with an exemption from quota restrictions.

Two or three vessels should be utilized in each gear category (single trawl, twin rig trawl, pair seine, seine net, gill net, beam trawl etc). and from each sector (Whitefish and Prawns) to allow for a comparison between different fishing methods in different areas.

CONDUCT OF TRIAL

Vessels will be exempted from quotas and all resultant legislation of the quota regime. Instead vessels will be issued with license variations allocating a permissible number of days (measured in hours) they are permitted to fish and the gears they may use.

The current list of the species for which they may fish issued with their license will have the addition of a flexible catch composition percentage of species which they may retain as part of their overall catch. (Currently vessels must refer to their FQA allocation of kilogram quotas for each species).

This percentage will be based on an average aggregation of a vessel track record of FQA units landed in the previous 5years – this accounts for FQA units both owned and rented to reflect the use of FQAs by the catching sector. This inclusion of landings negates the renting of quota which would otherwise impinge on the vessels profitability.

EXAMPLE - A vessels has usage of FQA units for monkfish constituting 50 percent of the vessels catch. The vessel will be granted a flexible catch composition percentage allowing the vessel to retain up to 50% of monkfish per trip before a loss of fishing days/hours is incurred.

A subsequent page will denote time penalties incurred on a graduated basis of days/hours from the vessels allocation should the flexible catch composition percentages be exceeded.

This system shall deter the vessel from pursuing a particular species which it has no track record for but if this species is caught it can be retained for the exchange of a loss of fishing effort (measured in days/hours) to halt further stock mortality which would have occurred in the time penalized.

These percentages should only be applied to high value species, such as monkfish, cod and soles, so as to prevent a free for all taking place on them or those species

which are in poor ecological condition. The purpose of Days-at-Sea is to allow an even harvesting across all species encountered in a mixed fishery ecology.

Conversely, Days should be awarded for species avoidance, and selectivity measures under a Conservation Credit Scheme.

MONITORING OF THE TRIAL

A vessel on the trial shall document two trips. One under the Days-at-Sea flexible catch composition percentages trial and a theoretical trip noting what the vessel would have retained and discarded had it been bound by quotas, this shall act as a comparison/ control.

The vessel shall log two documents one for days and one for quota.

Each document will list-

- overall stock mortality (i.e. catch)
- amount of catch that would have been retained and discarded under Quotas.
- overall expenses incurred for the trip.

The above information shall provide a documented comparison between the two management system on a fishing trip. This will allow comparison between the higher stock mortality needed to achieve a viable catch under quotas and the extra expense incurred to do so and that incurred under this proposed system of Days-at-Sea.

It is of the utmost diplomatic and operational importance that a Days-at-Sea system is implemented as an alternative to Catch Quotas if the majority of the UK demersal fleet is to survive the implementation of a Discard Ban and the government is to extricate itself cleanly from the CFP.

This proposed trial will prove the feasibility of Days-at-Sea, not only in theory but in hard, quantifiable facts and figures. Therefore the government and industry has nothing to lose by implementing such a trial.

The industry is at a precipice of viability if quotas are continued along with a discard ban enforced by cctv monitoring.

Discarding marketable fish is an aberration. However the cause of quotas must be addressed not a banning of its symptoms under Catch quotas.

It's now a choice of Days-at-Sea in a workable format allowing the government a clean break from the EU CFP and the industry given the chance to rejuvenate or Catch Quotas allowing a continuation of a shadow CFP and the decimation of a sizeable proportion of the UK demersal fleet.

This is the hard cold, unquestionable reality the industry and government must sober up to.

The status quo cannot be continued for political convenience and a minority of short term vested interests.

Having made huge sacrifices and endeavors to rebuild booming stocks it would be perversity to see a further reduction of the UK fleet caused by legislative ineptitude.

This would be a fundamental betrayal of the opportunity afforded by UK withdrawal for fishing to be a beacon of success for Brexit.

Arguments Against Days-at-Sea

A vocal minority within the industry have put up a steely wall of opposition to any suggestion of transitioning to Days-at-Sea.

There is trepidation that Days-at-Sea would result in allocations being set by the lowest common denominator species. However, the oncoming Catch Quota/Discard Ban system will set the industry to the lowest common denominator with Choke Species.

The concern that Days-at-Sea works by the lowest common denominator fundamentally misunderstands the operational and ecological principle behind Days-at-Sea.

“ Quotas have been an evident failure and Days-at-Sea allows catch less, land more in a shorter time for less expense incurred. ”

Effort control takes an ecology wide approach rather than individual species, setting effort to suit the entire ecology and manage it as a whole. Reducing the ecology as a whole by taking an even slice across all species to maintain the ecological balance rather than ‘cherry pick’ with Quotas and discarding (see Section 2, page 23).

Consequently, effort is set to the overall environment and thereafter catch compositions or temporary closures can be used to discourage vessels from species whilst still allowing keep what you catch if encountered negating the need to slash overall effort.

Consequently, the opposition to Days-at-Sea is primarily derived to protect vested quota interests and entitlements. It is not from an interest to conserve fish, as justified, or because Days-at-Sea, if implemented correctly, are operationally or conservationally ineffective and inept.

The Catch 22 is the industry had no option but to invest in FQA entitlements for Quota in order to survive. The industry has become based on the very quota system which is destroying it. Businesses and investments have become based on and forced to invest in FQA entitlements for Quota and therefore a sizeable minority are petrified to ‘lose’ their investment.

However, Days-at-Sea if implemented as suggested in Section 2, page 35, with a conversion of the FQA units into Flexible Catch Composition percentages, would retain the FQA units and investments whilst allowing a move to an economic and ecologically prosperous future that would be inclusive and beneficial to all and not to the detriment of substantial FQA holders.

Sadly, a small or narrow clique of individuals in the industry (and science) have become institutionalised by the system. They fail to see a transition to a fit-for-purpose system would not only benefit the marine environment, and the collective well-being of the industry, but also themselves.

One of the primary arguments against days is it will cause “capital stuffing”.

“Capital stuffing” propagates the idea that Days-at-Sea increases fishing technology and fishing efficiency and consequently stock mortality. This ignores that Quotas increase mortality through discards or shuts down the majority of the fleet with Choke Species.

“Capital stuffing” disingenuously suggests that efficiency keeps growing indefinitely and that fishing businesses do not already work at maximum efficiency possible.

Fishing efficiency increases in steps-jumps when new inventions are introduced, rather than in a constant curve and not every new gadget necessarily improves catching capacity.

The theory that effort control brings an automatic increase in fishing effort is a gross simplification to discredit effort control that doesn’t stack up with reality.

“ Quotas and the FQA system have developed a two-tier industry – one of actual fishermen and one of ‘slipper skipper’ quota renters. It is ‘slipper skippers’ who constitute a sizeable number of the most vocal opponents of Days-at-Sea. ”

THE FOUR POINTS SUPPOSED TO BE TO THE DETRIMENT OF DAYS-AT-SEA LEADING TO “CAPITAL STUFFING” ARE-

- Intensifies fishing effort within the days allocated
- Leads to the refinement of fishing gear
- Leads to High Grading
- Leads to an increase in HP.

TO REFUTE THESE POINTS -

- **Intensifies Fishing Effort** – Quotas unnecessarily intensify effort as vessels must catch more to land less incurring extra time and stock mortality to do so. No vessel does not work as hard as possible upon commencing fishing. Intensifying effort suggests that there is a sizeable number of boats that would, or more pertinently **could**, increase their effort – this does not stack up to operational reality.
- **Refinement of fishing gear** – This suggest that vessels are already consciously fishing inefficiently and that net designers and manufacturers are producing inefficient gear. There is only so far fishing gear can be refined or improved. All vessels already operate their gear as efficiently as possible.
- **Leads to High Grading** – The opposite is true. Quotas lead to high grading as boats try to maximise price per kg return on what little quota they have. Days-at-Sea encourages vessels **NOT** to high grade to retain all the catch in the time allocated.
- **Boats upgrading to bigger horsepower** – Suggests that there is enough un-utilized kw license capacity for a significant proportion of trawlers to increase their horsepower – there is not. Amalgamation of licenses is possible to build bigger vessels however catching capacity remains constant whether 1 large or 2 small.

Continuing with quotas and discarding to adhere to them is no longer an option. The industry either has Catch Quotas, which will decimate the fleet with Choke Species, or moves to Days-at-Sea, in a transitional system as proposed, to benefit all active fishermen and allow ecologically fit for purpose management that allows fish and fishermen to prosper.

Discards and Discard Ban

> *"A Discard ban addresses the symptom not the cause."*

Current rules see fish which a vessel has no quota for discarded to comply with the quota allocation. This is a waste and increases stock mortality whilst afflicting vessels profitability by causing incurring subsequent additional operational expense in spending extra time at sea

Rather than address that the discards are caused by quota restrictions, a Discard Ban will see vessels have to account for species they otherwise are compelled to discard to remain fishing for their whole quota allocation. Once quota is exhausted vessels, PO's and areas will be shut down.

As discards are caused by the quota regime, removing the cause of the problem (quotas) would eradicate the symptoms (discards)and would negate the need to legislate and enforce a ban.

> *"No fishermen wish to exert extra effort or dump marketable fish - it must be recognised that discards are a result of policy and law, not the fishermen."*

A Discard ban could only work under Days-at-sea system without arbitrary individual species limits. Days will eliminate the situation of choke species which are impossible to eliminate with gear technology without untying the cod end.

It is desirable to minimise catches of unwanted species by pushing the boundaries of trawl technology/selectivity, however, it is not a magic wand and gear technology/selectivity can only go so far.

Consequently, no matter the efforts made, there will always be some discards and this must be recognised.

Therefore, a British Discard Ban must be a Discard Minimization Policy, not an arbitrary ban.

Days-at-Sea facilitates this although there should still be certain exemptions to No Discards to avoid unintended consequences/practicalities. There must be exemptions to take account of species of which there is no scientific benefit of bringing ashore.

- Many species have high survivability, i.e. all flat fish/dogfish which would survive
- Bringing all marine organisms ashore would have a detrimental impact on the marine ecology by removing a food source.
- All unwanted catch being brought ashore moves the problem from being a food source at sea to a landfill site issue.
- It must be recognised that it is impossible to avoid running into dense hauls of bulk species which a vessel does not have the capacity to handle.
- No one has given regard to vessel safety and stability or capacity to handle all unwanted catches

Minimising Discards is a great and noble aim but it must work with practicalities and reality.

Under the proposed Days-at-Sea system all marketable fish will be brought ashore, all undersized marketable fish can be mainly avoided through technical measures and those which are taken should be accounted for unless they have high survivability. Unmarketable species should be recorded for science but allowed to be discarded.

Resources Amnesty - De-monetarization of Resource Entitlements

A resources amnesty should be enacted - Shares of current UK allocations and investments in them should be respected for business stability and continuity. However, ALL future UK fisheries entitlements to repatriated resources should be de-monetarised.

All repatriated resources should be held in a government pool as the nation's resource and allocated for the benefit of all fishermen and communities. Fisheries resources belong to the nation and should be for the betterment of all the industry not corporatized by a few.

Days-at-Sea would facilitate a demonetarised system and would end the debt dependency where vessels are having to loan and borrow desperately to obtain quota to remain stagnant. Catch Quotas with a discard ban will intensify this as quotas are exhausted more rapidly than is currently the situation.

> *Fishing for Leave bears no malice to big companies and believes everyone should be allowed to prosper fairly to whatever level their efforts determine. However, what is happening with the current quota system is a political construct not natural progression.*

The removal of Quotas, a resources amnesty and demonetarisation of fishing entitlements will provide more liquidity to fishing businesses. Allowing the catching sector to reinvest and progress into the future, allowing the UK fleet to emulate the prosperity and forward thinking of that in Norway.

The purchase and renting of quota undermines profitability. It has led to a corporatised situation of consolidation of fishing rights into the hands of few, destroying family fishing, communities and heritage whilst causing vessels to fish harder.

Further consolidation will finish many ports, stifle new entrants and disincentivise young men from the hard challenge of fishing by eliminating the ability to progress.

We implore the minority who want to continue quotas to see that an alternative system is inclusive in benefiting them too. A better system would be advantageous in ensuring a clean break from an EU Quota system and would put the whole industry on a sounder footing, allowing rejuvenation of the UK fishing industry and coastal communities.

> *What has happened with quotas has been a fiddle on a monumental scale by a minority who were in the loop during the quota reference period of 1994 to 1996.*

Currently, we are seeing mainly family businesses stagnating or being undermined as the industry is bled dry by having to rent quota from slipper skippers and quota renters.

Beneath the façade of large landings from booming stocks, the industry is structurally a sick puppy. As many have poignantly observed, stocks are booming however many of the top skippers in the country have felt compelled to sell up.

Other areas of the country have been left to survive on the few species that are not quota pressured as access to their traditional fisheries has been eroded. The West coast and Irish Sea are prime examples

> *Some people will fume at the above but it is the truth of the situation.*

Sadly, we fear that due to political indifference, and a minority within the industry who are blinded by self-interests, that the UK will continue the same failed system and its inequities upon withdrawal.

If the UK persists with Quotas we will see the industry destroyed, Brexit or not.

Fishing for Leave aims and hopes for an ecologically sound, simple Days-at-Sea policy that allows healthy stocks that all fishermen, from big company to small family, can work to continue an industry, communities and fishing families for generations to come whilst providing food security and prosperity for the nation's economy as a whole.

Temporary closures and closed areas

Future UK fisheries management should reassess and implement a new approach to Temporary Closures, implemented and integrated with Days-at-Sea, and Closed Areas derived from EU Directives.

TEMPORARY CLOSURES OF FISHERIES

Temporary Closures allow managers to implement protection over areas which have an abundance of immature fish, congregation of spawning stock or a vulnerable species. Such a system is in operation within the effort control management system in Faroe.

As effort control allows accurate real time reporting, requirements for closures can be implemented based on accurate and real time situations.

Temporary closures can be worked in conjunction with a Days-at-Sea system and integrated through a Conservation Credit System. Temporary closures may not be arbitrary but could be an area vessels are encouraged to avoid by the award of extra Days.

There is already such a system to protect aggregations of Cod called Real Time Closures (RTCs). However, it has only applied to vessels registered in Scots ports - it would need to be made to apply UK wide and for Norwegian and Faroe vessels allowed in UK waters.

“ Contrary to having a conservation effect, permanent closures cause an aggregation of displaced fishing effort into concentrated areas. ”

Temporary closures are good in principle if incorporated correctly. However, they MUST be implemented based on correct and overwhelming evidence and not be a system to shut down large areas on dubious pretexts for long periods creating a perverse impact of displacing fishing effort into concentrated areas.

PERMANENT CLOSED AREAS FOR CONSERVATION

The industry embraces and advocates sustainable fishing and careful husbandry of the marine environment we depend on. The industry is not opposed to carefully selected and applied closed zones.

However, EU Directives have seen the implementation of MCZs/MPAs which have closed off large tranches of sea area on dubious environmental pretexts.

Contrary to having a conservation effect it is causing an aggregation of displaced fishing effort into concentrated areas.

Although a noble aim to protect mud strata and worms this must be balanced in the context of the overall ecology and the necessity of a sustainable industry producing food security for the nation.

Many MCZs/MPAs have been based on spurious science, have grown arms and legs and been hijacked to further an agenda of shutting down commercial fishing. Closed Areas must be justified and based on solid science and pretext with good reasons (i.e. to preserve nurseries of fish/spawning areas - not common mud worms)

They must be designated for a time period, be monitored to see their effectiveness and be open to review every two years.

Closing tranches of sea on idealistic whims displaces effort to other areas, jeopardises geographically limited small scale, low impact local fisheries and has a perverse impact on the ecology of the area.

It has been noted/proven that closed areas can have detrimental impact. Due to removing fishing effort and decreasing mortality, a species overpopulates an area, exhausting food supply, and causing collapse e.g. the plaice box and windsock.

Temporary Closures and Closed Areas should be incorporated into a stakeholder based framework (see Section 2, page 11).

The impetus behind Closed areas originates in EU Directives. Directives require member state parliaments to pass the required legislation to enforce them. Upon withdrawal, and the repeal of the European Communities Act, the provisions of Directives will still apply having been implemented through Acts of Parliament.

Consequently, upon withdrawal the Government should halt the implementation of Closed areas and review the whole system with the aim to restructure the designation and implementation of Closed areas into a more adequate system and framework, motivated by reality and not green ideology.

Technical Measures

> *"Technical measures are not a panacea or magic wand to mitigate choke species problems caused by Quotas and the Discard Ban."*

A UK Fisheries management policy should rationalise the multitude of technical measures into a concise UK wide set of standards. Currently EU rules have a ridiculous multitude of technical measures for a multitude of areas.

Fishing efficiency can be limited in four main ways

- The number of boats
- The number of nets in the water
- The amount of time said nets are actively fishing.
- The retaining efficiency of the nets.

The sensible and properly effective way to limit fishing mortality on stocks in a mixed fishery is to limit the effort on an area using Days-at-Sea in conjunction with technical measures (see Section 2, page 30).

A future UK management plan should urgently rationalise and standardise the multitude of different technical measures requirements around the country.

Currently there is a multitude of mesh size, twine thickness and escape panels from area to area - the minimum requirement must be uniform throughout the UK . Policy on technical measures should create a UK wide base standard for each particular gear category.

Thereafter, any additional adaptations and measures which improve selectivity and conservation, that are developed as an applicable response to local problems and requirements, should be allowed and encouraged.

A Conservation Credits scheme, incorporated within a Days-at-Sea management system, can operate an award system of extra effort to encourage

the implementation, adaptation and adoption of technical and selectivity measures above the standard national requirement. Such a system would encourage adoption of selectivity and species avoidance measures.

It must be remembered that the UK industry has already pushed the envelope in many instances with selectivity measures and a net can only reach a certain level of selectivity for species and sizes.

Britain has led the way and pioneered on trawl gear technology and great work has been done. This should be encouraged and consolidated within a national framework and department within a UK Marine Institute that assists and enables advances in designs to trial and adopt.

More investment is needed to develop shore based and sea going research programmes on gear technology.

TECHNICAL MEASURES, GEAR CONTROL AND RESTRICTIONS

Vessels Working Mobile Gear (Trawls, Seines and Beamers)

- Mesh sizes
- T90 Meshes
- Square mesh panels
- Eliminator Trawls
- Selective Grids
- Twin Separation Codends
- Headline Heights and Length.

Vessels using long lines

Vessels using long lines would be restricted by the number and size of hooks fished.

Vessels using gill or trammel nets

Vessels using this type of gear can be restricted by the length of gear in the water and mesh sizes.

Vessels using Scallop Gear

Vessels using Scallop Gear can be restricted by number of dredges and/or beam width.

Mesh sizes and Twine Thickness

It is proposed that there would be an immediate rationalisation creating a nationwide standard minimum mesh sizes and maximum twine thickness dependant on sector and gear types after full consultation with the industry to agree most applicable i.e.-

- TR1 – 120mm double 5mm
- TR2 – 100mm double 4mm
- BT1 – 100mm double 5mm
- etc

> *"There must be rigorous enforcement on technical measures."*

Mesh sizes and selectivity panels should be rigorously enforced and vessels should not be allowed to carry netting below the minimum size of the gear category they have chosen to work under.

REPLACE MINIMUM LANDING SIZE (MLS) WITH MINIMUM MARKETING SIZE (MMS)

All fish currently have a Minimum Landing Size (MLS).

With the removal of quota and the transition to Days-at-Sea to minimise discards the MLS should be replaced with a **Minimum Marketable Size (MMS)**.

This would allow any undersized fish taken to be landed and accounted for, contributing to stock knowledge, however, as fish below this size could not be marketed there would be no incentive to target small/juvenile fish.

Fish below MMS would be handled by a government scheme going to fishmeal.

Monies raised from fish below the MMS should be reinvested into a UK Marine Institute/Science Department operating an industry/science partnership.

Free Market Access

> *"Withdrawal from the single market opens far bigger hungry world markets and allows the UK fishing industry to diversify into these markets."*

Although preferable and advantageous to have tariff free access to the EU it is not critical, especially when weighed against the huge UK resources reclaimed.

Tariff free Market access should not override the reclamation of fisheries resources within the UK EEZ.

The fundamentally obvious truism applies: 'You Have to be able to Catch it before you can Sell it'.

Therefore, there should be NO trade off in fisheries access or resources in return for tariff free access to the single market.

Tariff free access to EU markets is of little comparative advantage to the fishing industry when weighed against the 59% of UK fisheries resources already taken to those markets for free by EU vessels.

Currently, UK fisheries resources are caught for free and landed to the continental market, undermining potential UK market share whilst losing the financial benefit of this fish to the UK industry and economy.

Reclamation of UK fish fisheries resources for the exclusive national benefit will increase the EU's necessity to buy fish from UK suppliers not lessen it.

The majority of fishermen and processors who run the business that depends on the market are not unduly concerned and consequently neither should the government.

There is little to suggest, were the UK excluded from the EU market entirely, that UK seafood could not diversify into the hungry global markets, as others already do, or be channelled into domestic demand.

> *"It is political arrogance to suggest that buyers and sellers only trade because of an EU political project not because of desirable products at reasonable prices."*

There is currently a high level of exports, indicating that prime British seafood is in demand. That demand from EU consumers will remain, whether the UK is part of a political project or not - trade is between buyer and seller, not politicians.

FACILITATING THE FUTURE

The Government in conjunction with the industry should look at promoting the multitude of excellent domestic species to encourage consumption within the UK market.

A repatriation of all UK resources would see the amount of fisheries resources double. The government should look to implement a scheme of short term capital investment loans to those within the processing, marketing and distribution chain.

This would help the UK fishing industry to rapidly expand to utilise the UK's fantastic fisheries resources to their full potential to generate employment and rejuvenation of coastal communities.

UK seafood is renowned worldwide for its quality and standard - it is hard to foresee demand subsiding.

IN SUMMARY

Norway, Iceland and Faroe have no difficulty exporting fish globally as well as into the EU market en-mass.

All are independent countries out with the EU yet export fisheries products to the EU far in excess of the UK without difficulty Although they are in the EEA fisheries are not included in tariff free access.

In the event that tariffs were applied it must be remembered:

1. The current guidelines and parameters set by the World Trade Organisation (WTO) would not see punitive tariffs applied even if there were a desire to do so as 'punishment'.
2. UK Seafood is a world renowned product – the UK pelagic fleet (herring and mackerel) among others in the shellfish sector (razor fish, scallops) show the global potential of UK fisheries.
3. A multitude of other nations around the globe export to the EU without being in a political union and without being in the 'free' market.

Should no deal be concluded before the expiry of the Article 50 time frame then Britain would default to World Trade Organisation tariffs. At less than 10% for fisheries products this would not be prohibitive.

When the gain of raw material is balanced against the relatively minor inconvenience of tariffs it becomes apparent that the industry fits the description of "No deal is better than a bad deal".

Trade would continue as the UK, along with Norway and the other Nordic countries, would control a vast proportion of the EU's seafood supply. With a large population of hungry mouths to feed it is difficult to imagine the EU cutting off its nose to spite its face.

Flag Ships and the Merchant Shipping Act

'Flag Ships' are vessels on the British registry, however, they are primarily owned by interests in the EU. These vessels obtained registration in the UK under the EU principle of the Freedom of Establishment.

Through being registered as UK Fishing Vessels, Flag Ships are allowed to not only fish UK waters, but do so under any UK fishing policy. Consequently, these Flag Ships are able to fully exploit all UK opportunities and resources.

The Merchant Shipping Act 1988 was an attempt by the UK government to stop this 'quota hopping' however it was found to be in breach of European Union law by the European Court of Justice (ECJ) after the Factortame case 1989.

As the United Kingdom will no longer be bound by the ECJ and EU Treaties, then the situation regarding Flag Ships will revert back to the UK.

Resultantly, the UK will have control, through the Merchant Shipping Acts, to allow the government the right and ability to remove EU owned but British registered fishing vessels if it chooses to do so.

As these Flag ships have acquired their UK registry under Freedom of Establishment, rather than the Common Fisheries Policy, this means they will be embroiled in the wider negotiations due to their registry being obtained through this freedom of establishment.

This diplomatic complication and embroilment within an EU system, that impacts upon a multitude of other EU businesses operating in the UK, suggests the government would not want to risk a diplomatic issue over flag ships.

However, these flag ships should be subject to far stricter terms of operation on the UK registry and provisions should be made under the Merchant Shipping Acts to do so and enforce this.

If Flag Ships cannot be removed, then the "economic link" specified in UK legislation for Fishing Vessel registration should be strengthened.

This economic link is a provision that a British registered fishing vessel must land a proportion of its catches into the UK and must be crewed by a proportion of British nationals, so the UK benefits economically.

Currently this is neither strong enough nor rigorously enforced.

To regenerate the UK fishing industry, domestic and flag ship vessels should be made to land **and sell** over 60% of catches in the UK and over 60% of the crew must be British nationals.

This would, in the case of Flag Ships, ensure that they operate as a genuine UK vessel rather than in a manner akin to a fishing tourist.

Rigorously enforcing this landing/selling and crewing requirement would ensure that the UK benefits economically from these vessels whilst doing so in a manner that does not embroil the rectification of the Flag Ship situation, with the wider negotiations over the Freedom of Establishment.

To avoid a recurring situation of foreign interests being able to register and obtain rights to fish the British people's greatest natural resource, to the detriment of British coastal communities, the government should revise the criteria for all future applications to the British fishing vessel registry.

In the future, when the UK is no longer subject to EU freedom of establishment criteria, all fishing vessels that wish to operate on the British registry should have at least 60% ownership by British nationals. Such a policy is no different to that employed in the other independent Nordic countries.

Such criteria would run concurrently to those detailed above, that the economic link would stipulate that over 60% of catches must be landed and sold in the UK, and 60% of the crew must be British nationals.

The above criteria would ensure that our rich fishing grounds would be exploited predominately by British nationals, for the benefit of British communities, so our industry and coastline can flourish once again.

Future Relationships

Upon withdrawal the UK must work with the other Nordic nations, through the NEAFC, in broad but unbinding agreements, to manage the majority of the NE Atlantic fisheries which will fall within these nation's jurisdiction.

International law provides obligations for nations to co-operate in a broad unbinding framework to manage and husband this colossal resource and safeguard marine stocks and the environment.

With each of these nations having genuine stakeholder involvement and interests in a healthy marine environment, the UK should join and co-operate on overall management with the other Nordic nations through the North East Atlantic Fisheries Council (NEAFC).

The NEAFC allows independent coastal states to reach agreements on TACs, shares of them, exchanges of fishing opportunities within one another's EEZ and facilitates co-operation over straddling and migratory stocks.

The UK will be able to claim sovereignty over all the resources within the UK EEZ and consequently a rightful share of internationally agreed TACs.

Thereafter, the UK can co-operate through the NEAFC to ensure stocks are husbanded and managed sustainably by reaching agreements on these TACs so no nation fishes outwith the overall scientific recommendations but within what is it's fair share of the TACs.

The UK will be able to claim sovereignty over all the resources within the UK EEZ and consequently a rightful share of internationally agreed TACs.

The UK would've acted honourably under the provisions of UNCLOS 3, in reclaiming what is recognised as rightfully hers.

> *"We must think and act as an independent sovereign nation again and pursue what is best for the UK rather than be beholden and trapped in thinking inside an ideological framework like the CFP."*

Thereafter it would be the duty and responsibility of the EU to avoid "Derby" fishing. By readjusting its currently over inflated fishing opportunities, to reflect the withdrawal of the UK from the EU, and the loss of the UK's rich fishing grounds.

Future Frame Work

Future framework for co-operation should be fluid rather than rigid and not jeopardise our exclusive rights over the UK EEZ.

The UK should agree broad targets regarding conservation with the other coastal states and thereafter manage our resources under a UK Fisheries Management Plan. With the format of safeguarding one's own resources in place it will allow and encourage suitable sustainable management.

Any specific agreements with the other Nordic nations can be agreed on an individual needs basis. It would be advisable to have only broad agreements necessary and the UK should, regarding fisheries, aim and legislate to never become enmeshed in a disaster like the CFP ever again.

> *"The UK should aim for cordial relationships, co-operating on fisheries only when necessary and when of mutual benefit."*

As outlined previously, it will be at the UK's discretion and control to exercise whatever system is most applicable within the UK EEZ under international law and the terms of UNCLOS III.

UNCLOS III and the NEAFC should be the medium which the UK should look to operate through. The ideological approach should be to safeguard UK resources for the UK's benefit rigorously. Iceland, Norway and Faroe appear to be able to avoid and resolve disputes in this manner, there is no reason why this cannot work for the UK away from the integrationist policies and objectives of the EU.

This would allow us to manage and husband one of our countries greatest renewable resources for the benefit of the nation and future generations.

Resuming Sovereign Responsibility

The vote to leave the EU was a cry for the United Kingdom to become a fully independent sovereign nation state again able to control her own affairs and destiny for the interests and benefit of her people.

The government should note from the experience of Norway and the other Nordic countries that independent, sovereign nations control and husband their fisheries in a far better manner than the EU. Where a mass bureaucracy and the over-riding principle of political integration over rules pragmatic, sensible, responsive management.

The relationship between the EU and these nations proves that we do not need to subvert control of our national interests to the EU or others in order to succeed.

If small nations such as Norway and Iceland can prosper, especially in regard to fisheries, then it should not be beyond the United Kingdom of 65million people and one of the world's most powerful and successful nations to do so also.

The only thing that has stopped the UK from doing so is our membership of the EU driven by political ideology not the interests of strategic national benefit.

Politically the example of the Nordic nations shows that national control is massively beneficial both in allowing the nation to exploit all its resources but also in terms of fit for purpose management.

Days-at-Sea Summary

An Administratively Simple Future Management Plan – Fit for Fish and Fishermen

A Days-at-Sea system can, indeed will, produce a huge improvement in fisheries management. A summary of the principles of Fishing for Leave's proposed system is detailed below along with additional points of other measures that can bring improvements within a Days-at Sea framework.

1 **Days-at Sea with keep what you catch** - improves sustainability by working with the ecology of the UK's demersal mixed fisheries rather than trying to impose a rigid, ill fitted system upon them.

2 **Eliminates discards** - It removes the cause of discards ending catch more land less. No fisherman wants to discard marketable fish- a time limit encourages retention of all catch.

3 **Diplomatically** - allows the UK a clean break from an EU quota system and relative stability shares with no recourse under international treaty law or human rights for the EU to claim current share outs.

4 **Improves Science** - Keep what you catch allows accurate reporting of stocks. Integrating satellite monitoring, electronic log books and soak time/temperature sensors into an electronic automatic mapping database would allow real time observation of where, what and when fish were being caught.

5 **Encourages Technical Measures and Selectivity** - these can be run in conjunction with Days-at-Sea and integrated through a Conservation Credit system which would award extra time for species avoidance and selectivity measures.

6 **Provide Business Stability** - by preserving British FQA track records and the investment in them by converting FQAs to be expressed as flexible catch composition percentages instead of arbitrary kg quotas.

7 **Increases Profitability** - allows the retention and landing of more value for catching less quantity, in a reduced time at sea. Less time at sea and less pressure on stocks is required with Days-at-Sea, keep what you catch.

8 **Non Transferable Days** - Vessels would be given a set number of non-transferable days at sea measured in hours per year. This provides forward planning and business stability by allowing fishermen to produce an annual business plan and would negate any 'race to fish'.

9 **Demonetarises Fishing Entitlements** - All future entitlements to the nations fishing resources would remain with the nation. This avoids repetition of the quota trade. Fishing entitlements being only granted to active fishing vessel eliminates 'slipper skipper' quota traders and returns all fish entitlements to actual fishermen in the catching sector.

10 **Increase Fleet Liquidity and Reinvestment** - quota purchase and leasing costs have undermined the financial health of a large proportion of the UK fleet. By eliminating quota purchase/rent there will be an increase in capital for re-investment and improvements and ability for new entrants.

11 **Acts as an Equaliser ending infighting** - As Days-at-Sea will be a uniform basis to the system; all vessels will be on a level playing field ending sectoral infighting and robbing Peter to pay Paul.

12 **Flexible Hours** - All Days-at-Sea would be measured in hours to allow flexibility for daylight/dark fisheries, weather and distance of grounds. This accommodates all non-sector, non-nomadic vessels working from the beach, tidal harbours, rivers, inlets and main ports.

13 **Effort can Geographically Spread** - Time at sea would be measured as soak/fishing time and not judged on the 'harbour to harbour' time. Soak Time allows vessels to spread out over a wide geographical area. This can be accomplished using electronic sensors integrated in e-logs to monitor gear deployment.

14 **Improves Safety** - Vessels can fish at optimum times. The necessity to discard increases time at sea, crew fatigue and weather conditions worked. Soak time means vessels do not feel compelled to avoid losing time running for shelter or dodging.

15 **Reduces Administrative Burden** - Fishermen, fishery officers and managers are struggling with the amount of paperwork and ever changing laws and compliance measures. The above proposals would greatly simplify this for all.

16 **New Administrative Year** - an adjustment of moving the commencement of the administrative fishing year to April/May would allow fishermen to commence fishing into the summer and winter when fish are at their best and avoid fishing at spring spawning time.

17 **Improve Compliance** - Removing Quotas removes the need to cheat and misreport. Fines and penalties can be integrated to the Days-at-Sea system - resulting in a loss of hours. Reducing effort and preserving stocks rather than increasing effort to pay a monetary fine.

FISHING FOR **LEAVE**

The Robbery of UK Resources

"This island is made mainly of coal and surrounded by fish. Only an organizing genius could produce a shortage of coal and fish at the same time."

ANEURIN BEVAN - MP (CREATOR OF THE NHS)
SPEECH AT BLACKPOOL, 24 MAY 1945

". . . and now we import both . . ."

JOHN ASHWORTH - FOUNDER OF SAVE BRITAIN'S FISH
DECEMBER 2016

"Brexit means that the British Fishing industry would be worth £6,284 million to the British economy"

FISHING FOR LEAVE

60% of the British Fish Fleet has been scrapped due to the EU

Post Brexit TAC Table & Maps

The following table, maps and information is produced from the database built by Fishing for Leave.

This database calculates the Post Brexit TOTAL ALLOWABLE CATCH (TAC) shares for the United Kingdom and European Union and compares this to the existing shares.

The UK, since the inception of internationally agreed TACs, has never been an independent coastal state under the terms of UNCLOS 3, having surrendered control of fisheries to the European Union upon joining in 1973.

Due to this, the UK has only ever received a share of the international TACs under the EU Quota system. This EU Quota system was established in 1983, with the system of relative stability shares. These are a mechanism to allocate the resources subsumed to EU control.

These shares were created on the back of the Common Fisheries Policy (CFP) founding principle of "equal access to a common resource".

The share-outs, under the EU Quota system, have disproportionately been weighted towards the other EU member states, particularly France, to the gross disadvantage of the UK.

The relative stability EU Quota system in no way reflects the distribution of fish stocks or the geographical location of catches.

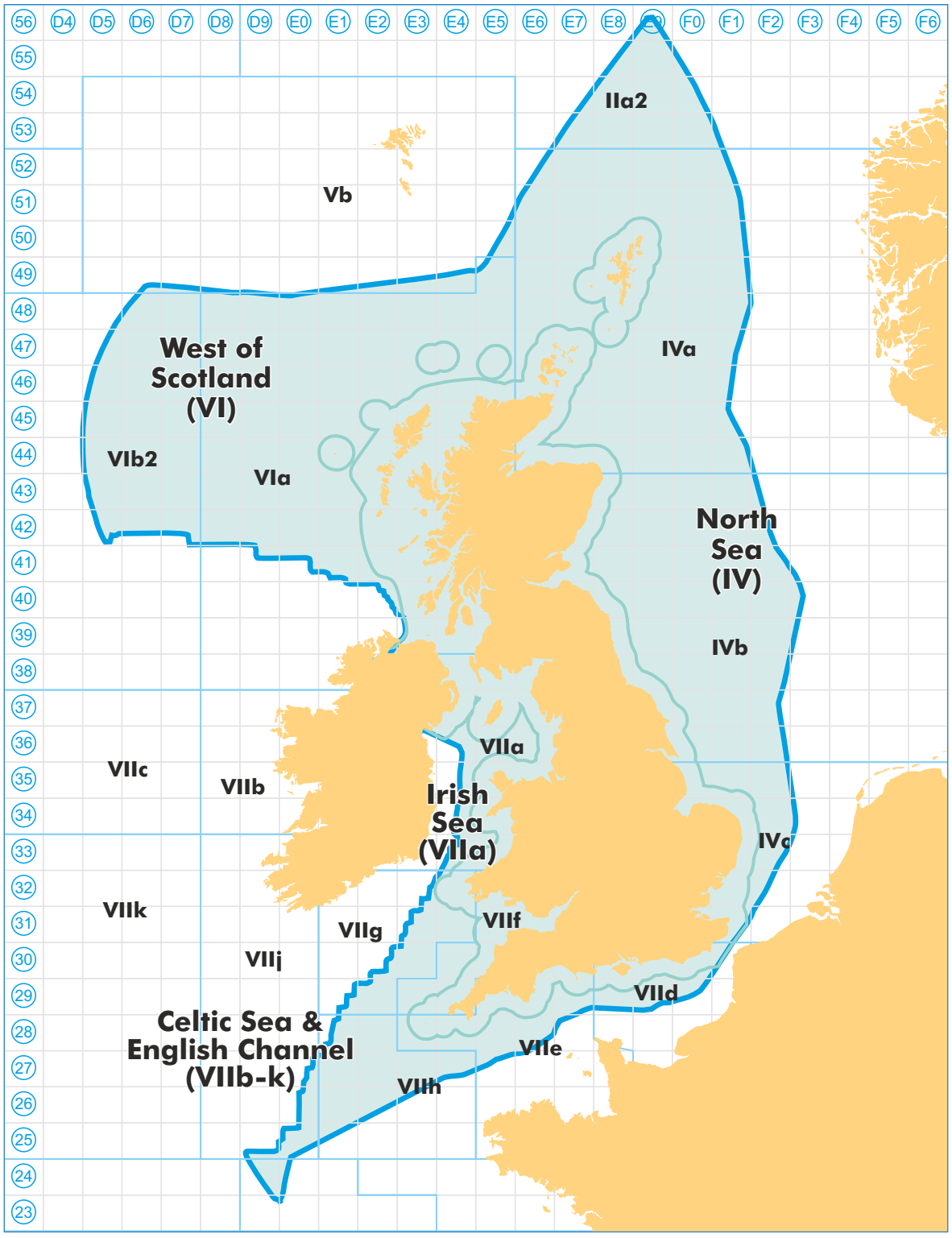
Resultantly, the UK only receives 25% of the TAC but has 48% of the International Council for Exploration of the Seas (ICES) sea areas surrounding the British Isles within our Exclusive Economic Zone (EEZ).

Under the internationally agreed terms of UNCLOS 3, an independent nation (coastal state) has sovereign rights over all natural resources, living and mineral, within its EEZ.

When we withdraw from the EU and the Treaties cease to apply, and therefore the CFP, (unless adopted with the Great "Repeal" Bill), UNCLOS 3 gives the UK the right, under international law, to manage its own fisheries at the UK's own discretion as the vast majority of nations do.

EU Quotas cause needless mass discarding of prime fish

UK EEZ, UK 12 Nm, ICES AREAS, SUB AREAS & GRID-SQUARES



UK Exclusive Economic Zone (EEZ)

UK 12 nautical mile limit

IVc ICES fisheries area

All sea area figures above produced by UK Hydrographic Office

DATABASE INFORMATION

The Fishing for Leave database operates by showing the catches by UK vessels and EU vessels within the EU EEZ and the UK EEZ respectively. It does so for each major commercial species, in each ICES fisheries area, around the British Isles.

All species that are subject to the EU Quota system are formatted as per the EU Quota allocations.

This is to show what the UK divorce settlement of the TACs should be based on catch, (and therefore) stock distribution.

Catch distribution is an accurate reflection of stock distribution. Contrary to some popular misconceptions, EU fishermen do not spend extra time, fuel and expense to travel to the UKs rich fishing grounds for the scenery. They do so due to our rich grounds and the abundance of fish on our grounds.

The figures for the catches, by the respective fleets, in respective waters are then compiled to show total fish caught in UK waters and total fish caught in EU waters.

The ratio established by these respective figures can then be applied to the EU TAC shares. This shows what the actual division of this TAC share should be between the UK and EU and, therefore, the UK Post Brexit divorce TAC allocations.

All figures are derived from the EU Commission's Scientific, Technical and Economic Committee for Fisheries (STECF) database with the information from the Data Collection Framework (DCF). Following figures are an annual average taken from results from 2010 - 2014. Some species are based on less than 5 year results, no less than 2 years, due to paucity of data.

This shows the catches by vessels of each member state, for each species in each individual ICES statistical grid-square.

These ICES statistical grid-squares are the smallest geographical area that can be utilised. They allow the larger ICES fisheries areas, over which the international TACs are set, to be divided into waters of the UK EEZ and the EU EEZ.

Where a grid-square transcends both parties EEZs, the information from this area has been divided according to the proportions of the square falling to the EU and UK.

English & Latin names plus species code

Sea area, sub-areas and MMO average price per tonne

SOURCE 1 - data collected under EU control regulation (from landings)

SOURCE 2 - data collected under STECF Data Collection Framework (DCF) (from e-log books)

SOURCE 2 TOTALS Total figures of respective EU waters and UK waters from left

Fishing for Leave post-Brexit calculations

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Sandeels *Ammodytes spp* **SAN**	**North Sea**	Quota	**234,528**	231,231	3,297							87,014	147,514
		% Quota		99	1							37	63
	*IIa (EC), IIIa, IV (EC)*	Catch	**217,786**	215,285	2,501	141,533	85,164	3,026	107	85,272	144,559		
		% Uptake		93	76	62	37	1	..	37	63		
	Average price per tonne: £1,499	Value (£ 000's)	**£351,556**	£346,613	£4,942	£212,157	£127,660	£4,536	£161	£127,821	£216,693	£130,434	£221,122

TO CALCULATE THE POST-BREXIT ALLOCATIONS

1 Total **SOURCE 2** figures into respective **EU WATERS TOTAL** and **UK WATERS TOTAL.**

2 This creates a **RATIO** of what has been caught in each parties waters, averaged over the last five years.

3 This **RATIO** of catch locations is then divided into the **SOURCE 1 TOTAL AVG TAC ALLOCATION** information.

4 This then shows what the **POST-BREXIT TAC ALLOCATIONS** should be.

5 This shows the **DISCREPANCY** between the current allocations and what they should be. This shows how much the UK has been robbed by the EU.

Albacore

Thunnus alalunga

ALB

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Northern	Quota	**27,233**	26,987	246							27,107	126
	% Quota		99	1							100	..
Atlantic ocean, northof latitude 05° N	Catch	**18,139**	18,049	90	37	8,027	1	53	8,081	38		
	% Uptake		67	36	..	99	..	1	100	..		
Average price per tonne: £20,000	Value (£ 000's)	**£544,667**	£539,742	£4,926	£740	£160,548	£13	£1,067	£161,615	£754	£542,139	£2,528

Anglers/Monkfish

Lophiidae

ANF

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea	Quota	**10,004**	1,886	8,117							80	9,924
	% Quota		19	81							1	99
IIa (EC), IV (EC)	Catch	**6,529**	663	5,866	407	38	5,536	10	48	5,943		
	% Uptake		35	72	7	1	92	..	1	99		
Average price per tonne: £3,100	Value (£ 000's)	**£31,011**	£5,848	£25,163	£1,262	£117	£17,161	£31	£148	£18,422	£248	£30,763
West of Scotland	Quota	**5,414**	3,325	2,088							1,176	4,237
	% Quota		61	39							22	78
Vb (EC), VI, XII, XIV	Catch	**4,411**	2,560	1,851	809	515	1,047	1	515	1,856		
	% Uptake		77	89	34	22	44	..	22	78		
Average price per tonne: £3,100	Value (£ 000's)	**16,782**	10,307	6,474	2,509	1,595	3,245	2	1,597	5,753	3,646	13,135
7	Quota	**34,649**	27,958	6,691							19,133	15,516
	% Quota		81	19							55	45
VII	Catch	**25,672**	19,638	6,034	5,935	9,097	3,554	2,604	11,701	9,489		
	% Uptake		70	90	28	43	17	12	55	45		
Average price per tonne: £3,100	Value (£ 000's)	**£107,410**	£86,667	£20,743	£18,397	£28,201	£11,018	£8,071	£36,272	£29,415	£59,311	£48,099

Black Scabbard

Aphanopus carbo

BSF

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
1-4	Quota	**3**	1	1							2	..
	% Quota		50	50							80	20
I, II, III, IV (EC and International)	Catch	**..**	..	..	..	2	..	-	2	..		
	% Uptake		12	2	16	80	4	-	80	20		
Average price per tonne: £2,100	Value (£ 000's)	**£5**	£3	£3	£1	£4	£0	£0	£4	£1	£4	£1
5-7 & 12	Quota	**2,956**	2,872	84							499	2,457
	% Quota		97	3							17	83
V,VI, VII and XII (EC and International)	Catch	**2,364**	2,302	63	1,326	282	62	..	282	1,388		
NB- 88% Catches are in area VI	% Uptake		80	74	79	17	4	..	17	83		
Average price per tonne: £2,100	Value (£ 000's)	**£6,208**	£6,031	£177	£2,784	£592	£131	£0	£592	£2,915	£1,049	£5,159

Blue Ling

Molva dypterygia

BLI

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
2, 4 & 5	Quota	**16**	12	4							..	15
	% Quota		78	22							2	98
II, IV and V (EC and International)	Catch	**15**	8	7	3	..	13	-	..	17		
	% Uptake		66	197	20	2	77	-	2	98		
Average price per tonne: £1,700	Value (£ 000's)	**£27**	£21	£6	£6	£1	£22	£0	£1	£28	£1	£26
6 & 7	Quota	**2,207**	2,023	184							203	2,005
	% Quota		92	8							9	91
VI and VII (EC and International)	Catch	**1,803**	1,653	149	783	94	148	1	94	931		
NB- 99% Catches are in area VI	% Uptake		82	81	76	9	14	..	9	91		
Average price per tonne: £1,700	Value (£ 000's)	**£3,752**	£3,439	£313	£1,330	£159	£252	£1	£160	£1,582	£344	£3,408

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Blue Whiting	**Northern**	Quota	**92,810**	79,959	12,851							58,889	33,920
Micromesistius poutassou		% Quota		86	14							63	37
WHB	*I, II, III, IV, V, VI, VII, VIIIabde, XII, XIV (EC and Int)*	Catch	**80,570**	68,800	11,770	21,517	33,782	2,086	7,196	40,978	23,603		
	***53% Catches are in Area VII - 2.5% in Area IV***	% Uptake		86	92	33	52	3	11	63	37		
	Average price per tonne: £1,050	Value (£ 000's)	**£97,496**	£83,997	£13,499	£22,604	£35,487	£2,192	£7,560	£43,047	£24,795	£61,863	£35,633

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Boarfish	**6-8**	Quota	**58,302**	54,507	3,795							45,023	13,279
Caproidae		% Quota		93	7							77	23
BOR	*VI, VII and VIII (EC and International)*	Catch	**38,434**	36,923	1,511	12,140	42,882	724	736	43,618	12,864		
	***NB- 99% Catches are in area VII***	**% Uptake**		**68**	**40**	**21**	**76**	**1**	**1**	**77**	**23**		
	Average price per tonne: £150	Value (£ 000's)	**£8,745**	£8,176	£569	£1,821	£6,432	£109	£110	£6,543	£1,930	£6,753	£1,992

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Cod	**North Sea**	Quota	**25,067**	11,950	13,117							11,407	13,660
Gadus morhua		% Quota		48	52							46	54
COD	*IIa (EC), IV*	Catch	**22,668**	9,816	12,853	1,797	8,163	10,053	1,733	9,896	11,850		
		% Uptake		82	98	8	38	46	8	46	54		
	Average price per tonne: £2,010	Value (£ 000's)	**£50,372**	£24,014	£26,358	£3,611	£16,403	£20,202	£3,482	£19,885	£23,813	£22,923	£27,450
	West of Scotland	Quota	**93**	41	53							20	73
		% Quota		44	56							22	78
	Vb (EC), VIa	Catch	**82**	36	46	25	39	114	-	39	139		
		% Uptake		89	87	14	22	64	-	22	78		
	Average price per tonne: £2,056	Value (£ 000's)	**£192**	£83	£108	£51	£80	£235	£0	£80	£285	£42	£150
	**7a**	Quota	**476**	294	182							41	434
		% Quota		62	38							9	91
	VIIa	Catch	**388**	239	149	129	26	150	1	27	280		
		% Uptake		81	82	42	8	49	..	9	91		
	Average price per tonne: £2,010	Value (£ 000's)	**£956**	£590	£366	£260	£52	£302	£1	£54	£562	£83	£873
	7d	Quota	**1,820**	1,650	170							480	1,340
		% Quota		91	9							26	74
	VIId	Catch	**1,305**	1,193	113	600	255	117	2	257	717		
		% Uptake		72	67	62	26	12	..	26	74		
	Average price per tonne: £2,010	Value (£ 000's)	**£3,657**	£3,316	£341	£1,206	£512	£235	£4	£516	£1,441	£964	£2,693
	7b-c, e-k	Quota	**7,952**	7,315	637							2,462	5,490
		% Quota		92	8							31	69
	VII (ex VIIa, VIId),VIII, IX, X; CECAF 34.1.1 (EC)	Catch	**5,327**	4,844	483	2,695	1,331	433	72	1,403	3,127		
		% Uptake		66	76	59	29	10	2	31	69		
	Average price per tonne: £2,010	Value (£ 000's)	**£15,980**	£14,699	£1,281	£5,415	£2,674	£869	£145	£2,819	£6,284	£4,948	£11,032

Dabs and Flounders

Limanda limanda,
Platichthys flesus
DAB, FLE

North Sea

IIa (EC), IV (EC)

Average price per tonne: £482

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Quota	**18,509**	16,936	1,573							**11,918**	**6,591**
% Quota		92	8							64	36
Catch	**8,083**	7,407	676	1,743	3,165	231	405	3,570	1,975		
% Uptake		44	43	31	57	4	7	64	36		
Value (£ 000's)	**£8,918**	£8,160	£758	£840	£1,525	£112	£195	£1,720	£951	£5,742	£3,176

Greater Forkbeard

Phycis blennoides
GFB

1-4

I, II, III, IV (EC and International)

Average price per tonne: £1,200

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Quota	**34**	20	14							-	34
% Quota		58	42							-	100
Catch	**4**	1	3	-	-	1	-	-	1		
% Uptake		7	21	-	-	100	-	-	100		
Value (£ 000's)	**£41**	£24	£17	£0	£0	£1	£0	£0	£1	£0	£41

5-7

V, VI, VII (EC and International)

NB - All Catches are in area VI

Average price per tonne: £1,200

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Quota	**2,187**	1,599	588							610	1,578
% Quota		73	27							28	72
Catch	**1,522**	1,375	147	-	-	21	8	8	21		
% Uptake		86	25	-	-	72	28	28	72		
Value (£ 000's)	**£2,625**	£1,919	£705	£0	£0	£25	£10	£10	£25	£732	£1,893

Greater Silver Smelt

Argentina silus
ARU

3 & 4

III (EC), IV (EC)

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Quota	**468**	460	8							-	468
% Quota		98	2							-	100
Catch	**2**	..	2	..	-	5	-	-	5		
% Uptake		..	25	1	-	99	-	-	100		
Value (£ 000's)	**-**	-	-	-	-	-	-	-	-	-	-

5-7

V, VI, VII (EC and International)

NB - All Catches are in area VI

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Quota	**2,790**	2,624	166							2	2,788
% Quota		94	6							..	100
Catch	**1,671**	1,657	14	1,268	..	22	1	1	1,289		
% Uptake		63	8	98	..	2	..	..	100		
Value (£ 000's)	**-**	-	-	-	-	-	-	-	-	-	-

Greenland Halibut

Reinhardtius hippoglossoides
GHL

2a, 4 & 6

IIa (EC), IV, VI (EC and International)

Average price per tonne: £1,500

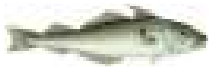
NB - 60% Catches are in Area IV

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Quota	**584**	327	257							..	584
% Quota		56	44							..	100
Catch	**380**	203	177	166	..	174	..	..	340		
% Uptake		62	69	49	..	51	..	..	100		
Value (£ 000's)	**£876**	£491	£385	£249	£0	£261	£0	£0	£510	£0	£876

Haddock

Melanogrammus aeglefinus

HAD



			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**31,499**	2,887	28,612							4,825	26,674
		% Quota		9	91							15	85
IIa (EC), IV		Catch	**29,545**	2,005	27,540	646	1,551	23,289	2,779	4,329	23,935		
		% Uptake		**69**	**96**	**2**	**5**	**82**	**10**	**15**	**85**		
Average price per tonne: £1,187		Value (£ 000's)	**£37,393**	£3,427	£33,966	£767	£1,841	£27,646	£3,299	£5,139	£28,413	£5,728	£31,665
West of Scotland 5b & 6a		Quota	**4,071**	834	3,237							429	3,642
		% Quota		20	80							11	89
Vb (EC), VIa		Catch	**3,659**	668	2,991	261	376	2,934	..	376	3,195		
		% Uptake		80	92	7	11	82	..	11	89		
Average price per tonne: £1,187		Value (£ 000's)	**£4,832**	£990	£3,842	£310	£447	£3,482	£0	£447	£3,793	£509	£4,323
7a		Quota	**1,372**	701	671							40	1,332
		% Quota		51	49							3	97
VIIa		Catch	**835**	485	349	81	8	348	5	13	429		
		% Uptake		69	52	18	2	79	1	3	97		
Average price per tonne: £1,187		Value (£ 000's)	**£1,629**	£833	£797	£96	£9	£413	£6	£15	£509	£48	£1,582
7b-k		Quota	**13,390**	12,067	1,323							4,655	8,736
		% Quota		90	10							35	65
VII (ex VIIa),VIII, IX, X; CECAF 34.1.1 (EC)		Catch	**12,933**	11,621	1,312	6,073	3,730	1,198	144	3,874	7,271		
		% Uptake		96	99	54	33	11	1	35	65		
Average price per tonne: £1,187		Value (£ 000's)	**£15,896**	£14,325	£1,571	£7,209	£4,428	£1,422	£171	£4,599	£8,631	£5,526	£10,370

Hake

Merluccius merluccius

HKE

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**4,410**	2,287	2,123							2,165	2,245
		% Quota		52	48							49	51
IIa (EC), IV		Catch	**3,546**	1,556	1,990	1,064	2,392	2,278	832	3,224	3,342		
		% Uptake		68	94	16	36	35	13	49	51		
Average price per tonne: £2,105		Value (£ 000's)	**£9,283**	£4,814	£4,469	£2,239	£5,036	£4,796	£1,751	£6,787	£7,036	£4,558	£4,725
6 & 7		Quota	**37,012**	31,467	5,546							24,067	12,945
		% Quota		85	15							65	35
Vb (EC), VI, VII, XII, XIV		Catch	**33,469**	28,478	4,990	7,289	17,702	3,225	1,845	19,547	10,514		
NB- 73% Catches are in area VII		% Uptake		91	90	24	59	11	6	65	35		
Average price per tonne: £2,105		Value (£ 000's)	**£77,916**	£66,242	£11,674	£15,344	£37,266	£6,789	£3,883	£41,149	£22,133	£50,665	£27,251

Horse Mackerel

Trachurus spp

JAX

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**38,578**	33,829	4,749							4,054	34,524
		% Quota		88	12							11	89
IVb, IVc, VIId		Catch	**21,028**	18,288	2,740	14,173	1,817	2,596	152	1,969	16,770		
		% Uptake		54	58	76	10	14	1	11	89		
Average price per tonne: £338		**Value (£ 000's)**	**£13,041**	**£11,435**	**£1,606**	**£4,791**	**£614**	**£878**	**£52**	**£666**	**£5,669**	**£1,370**	**£11,671**
West Coast		Quota	**164,467**	151,276	13,191							121,561	42,906
		% Quota		92	8							74	26
IIa (EC), IVa, Vb (EC), VI, VII (ex VIId),VIIIabde, XII, XIV		Catch	**132,030**	120,308	11,722	28,945	91,259	5,587	6,575	97,834	34,532		
NB - 73% Catches are in area VII		% Uptake		80	89	22	69	4	5	74	26		
Average price per tonne: £338		Value (£ 000's)	**£55,596**	£51,137	£4,459	£9,784	£30,849	£1,889	£2,223	£33,072	£11,673	£41,092	£14,504

Herring

Clupea harengus

HER

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea 4ab	Quota	**200,236**	153,877	46,359							5,973	194,263
	% Quota		77	23							3	97
IV (EC and Norway North of 53° 30'N)	Catch	**199,194**	152,927	46,266	151,387	6,078	46,446	5	6,083	197,833		
	% Uptake		99	100	74	3	23	..	3	97		
Average price per tonne: £381	Value (£ 000's)	**£76,281**	£58,620	£17,661	£57,672	£2,315	£17,694	£2	£2,317	£75,365	£2,275	£74,005
4c & 7d	Quota	**39,287**	35,558	3,729							3,558	35,728
	% Quota		**91**	**9**							**9**	**91**
IVc (exB/W), VIId	Catch	**36,250**	32,609	3,641	26,578	2,651	3,323	327	2,978	29,901		
	% Uptake		92	98	81	8	10	1	9	91		
Average price per tonne: £381	Value (£ 000's)	**£14,966**	£13,546	£1,420	£10,125	£1,010	£1,266	£125	£1,134	£11,391	£1,355	£13,611
West Coast	Quota	**24,643**	10,491	14,152							-	24,643
	% Quota		43	57							-	100
Vb (EC), VIa (North of 56° 30' N), Vib	Catch	**23,269**	9,534	13,734	7,109	-	13,331	-	-	20,440		
	% Uptake		91	97	35	-	65	-	-	100		
Average price per tonne: £381	Value (£ 000's)	**£9,388**	£3,997	£5,391	£2,708	£0	£5,079	£0	£0	£7,787	£0	£9,388
7a (Manx and Mourne)	Quota	**5,269**	29	5,240							896	4,372
	% Quota		1	99							17	83
VIIa (Manx & Mourne)	Catch	**5,149**	27	5,123	90	1,040	5,154	35	1,075	5,244		
	% Uptake		92	98	1	16	82	1	17	83		
Average price per tonne: £381	Value (£ 000's)	**£2,007**	£11	£1,996	£34	£396	£1,964	£13	£410	£1,998	£341	£1,666
7ef	Quota	**964**	482	482							71	893
	% Quota		50	50							7	93
VIIe, f	Catch	**671**	360	311	195	41	323	-	41	517		
	% Uptake		75	65	35	7	58	-	7	93		
Average price per tonne: £381	Value (£ 000's)	**£367**	£184	£184	£74	£16	£123	£0	£16	£197	£27	£340
7ghjk	Quota	**17,922**	17,899	23							6,986	10,935
	% Quota		100	..							39	61
VIIg, h, j, k	Catch	**15,017**	15,015	1	8,806	5,629	4	..	5,629	8,810		
	% Uptake		84	6	61	39	..	..	39	61		
Average price per tonne: £381	Value (£ 000's)	**£6,827**	£6,819	£9	£3,355	£2,144	£2	£0	£2,144	£3,356	£2,662	£4,166
Clyde	Quota	**274**	-	274							-	274
	% Quota		-	100							-	100
VIa (Clyde)	Catch	**65**	-	65	-	-	553	-	-	553		
	% Uptake		NA	24	-	-	100	-	-	100		
Average price per tonne: £425	Value (£ 000's)	**£116**	£0	£116	£0	£0	£235	£0	£0	£235	£0	£116

Lemon sole and Witches

Microstomus kitt, Nematocarcinidae

LEM, WIT

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea	Quota	**6,417**	2,588	3,829							3,169	3,248
	% Quota		40	60							49	51
IIa (EC), IV (EC)	Catch	**2,963**	1,372	1,591	569	1,176	856	214	1,391	1,425		
	% Uptake		53	42	20	42	30	8	49	51		
Average price per tonne: £2,953	Value (£ 000's)	**£18,951**	£7,642	£11,309	£1,681	£3,474	£2,528	£632	£4,107	£4,208	£9,359	£9,591

Ling

Molva molva

LIN

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
4 (EC waters)	Quota	**2,628**	486	2,142							13	2,615
	% Quota		19	81							1	99
IV (EC)	Catch	**2,246**	241	2,005	189	9	1,898	2	10	2,087		
	% Uptake		50	94	9	..	90	..	1	99		
Average price per tonne: £1,363	Value (£ 000's)	**£3,582**	£663	£2,919	£257	£12	£2,587	£2	£14	£2,844	£18	£3,564
6-10, 12 & 14	Quota	**8,995**	6,031	2,964							3,075	5,920
	% Quota		67	33							34	66
VI, VII, VIII, IX, X,XII, XIV (EC)	Catch	**6,669**	4,225	2,444	1,678	1,414	1,816	401	1,815	3,494		
NB- 52% Caught in Area 6	% Uptake		70	82	32	27	34	8	34	66		
Average price per tonne: £1,363	Value (£ 000's)	**£12,259**	£8,220	£4,039	£2,288	£1,927	£2,475	£546	£2,474	£4,762	£4,191	£8,069

Mackerel

Scomber scombrus

MAC

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea NB// Source 1 And Source 2 Data has 10,000t error from UK to EU. *IIa (EC), IV*	Quota	**30,996**	27,912	3,084							337	30,659
	% Quota		90	10							1	99
	Catch	**31,658**	28,741	2,918	69,857	1,326	83,188	356	1,682	153,045		
	% Uptake		103	95	45	1	54	..	1	99		
Average price per tonne: £922	Value (£ 000's)	**£28,585**	£25,741	£2,844	£64,425	£1,223	£76,719	£328	£1,551	£141,144	£311	£28,275
* NB// Source 1 And Source 2 Data has 10,000t error from UK to EU. For correct figures Subtract 10k from EU & Add to UK in Source 2	*Adjusted Quota*	**30,996**	27,912	3,084							1647	29349
	Adjusted % Quota		90	10							5	95
	Adjusted Catch	**31,658**	28,741	2,918	16938	1326	13039	356	1,682	29,976		
	Adjusted % Uptake		103	95	54	4	41	1	5	95		
	Adjusted Value (£ 000's)	**28,585**	25,741	2,844	15,620	1,223	12,025	328	1,551,353	27,645,239	1,519	27,067
West Coast NB// Source 1 And Source 2 Data has 10,000t error from UK to EU. *II (ex EC),Vb (EC),VI,VII, VIIIabde, XII, XIV*	Quota	**334,414**	145,127	189,287							154,554	179,860
	% Quota		43	57							46	54
	Catch	**327,780**	138,644	189,135	45,329	52,472	66,088	43,270	95,741	111,417		
79% Catches are in Area 6	% Uptake		96	100	22	25	32	21	46	54		
Average price per tonne: £922	Value (£ 000's)	**308,409**	133,841	174,568	41,804	48,391	60,949	39,905	88,296	102,753	142,536	165,873
* NB// Source 1 And Source 2 Data has 10,000t error from UK to EU. For correct figures Subtract 10k from EU & Add to UK in Source 2	*Adjusted Quota*	**334,414**	145,127	189,287							96980	237434
	Adjusted % Quota		43	57							29	71
	Adjusted Catch	**327,780**	138,644	189,135	97,196	52,472	134,842	43,270	95,741	232,038		
	Adjusted % Uptake		96	100	30	16	41	13	29	71		
	Adjusted Value (£ 000's)	**308,409**	133,841	174,568	89,638	48,391	124,356	39,905	88,296	213,994	89,439	218,970

Megrims

Lepidorhombus whiffiagonis

MEG

		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea	Quota	**2,014**	92	1,922							33	1,981
	% Quota		5	95							2	98
IIa (EC), IV (EC)	Catch	**1,506**	37	1,469	31	21	1,447	4	25	1,478		
	% Uptake		41	76	2	1	96	..	2	98		
Average price per tonne: £2,728	Value (£ 000's)	**£5,494**	£250	£5,244	£85	£56	£3,947	£11	£67	£4,032	£90	£5,404
West of Scotland	Quota	**3,741**	2,524	1,217							505	3,236
	% Quota		67	33							13	87
Vb (EC), VI, XII, XIV	Catch	**1,423**	736	686	280	139	612	-	139	892		
	% Uptake		29	56	27	13	59	-	13	87		
Average price per tonne: £2,728	Value (£ 000's)	**£10,206**	£6,887	£3,319	£765	£379	£1,669	£0	£379	£2,433	£1,377	£8,829
7	Quota	**19,247**	16,203	3,044							11,717	7,531
	% Quota		84	16							61	39
VII	Catch	**12,113**	9,622	2,491	2,922	4,733	1,107	1,535	6,268	4,029		
NB- All Catches are in Area VIIb-k	% Uptake		59	82	28	46	11	15	61	39		
Average price per tonne: £2,728	Value (£ 000's)	**£52,507**	£44,203	£8,304	£7,971	£12,913	£3,020	£4,187	£17,100	£10,991	£31,963	£20,544

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Nephrops	**North Sea**	Quota	**22,968**	4,111	18,857							2,949	20,019
Nephrops norvegicus		% Quota		18	82							13	87
NEP	*IIa (EC), IV (EC)*	Catch	**14,598**	2,113	12,485	389	1,898	12,732	35	1,933	13,121		
		% Uptake		51	66	3	13	85	..	13	87		
	Average price per tonne: £3,080	Value (£ 000's)	**£70,739**	£12,661	£58,078	£1,197	£5,846	£39,214	£107	£5,953	£40,410	£9,083	£61,656
	West of Scotland	Quota	**16,882**	346	16,536							9	16,874
		% Quota		2	98							..	100
	Vb (EC), VI	Catch	**12,871**	33	12,838	26	7	13,007	..	7	13,034		
		% Uptake		10	78	..	..	100	..	..	100		
	Average price per tonne: £3,080	Value (£ 000's)	**£51,994**	£1,066	£50,929	£81	£20	£40,061	£0	£20	£40,142	£26	£51,968
	7	Quota	**24,243**	16,186	8,057							4,819	19,424
		% Quota		67	33							20	80
	VII	Catch	**16,765**	9,656	7,109	6,772	3,168	6,919	228	3,397	13,692		
	NB - 60% Catches are in Area VIIa	% Uptake		60	88	40	19	40	1	20	80		
	Average price per tonne: £3,080	Value (£ 000's)	**£74,665**	£49,849	£24,816	£20,858	£9,758	£21,310	£703	£10,461	£42,168	£14,841	£59,824

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Norway Pout	**North Sea**	Quota	**14,150**	14,150	-							145	14,005
Trisopterus esmarkii		% Quota		100	-							1	99
NOP	*IIa (EC), IV*	Catch	**4,636**	4,635	1	202	2	6	-	2	208		
		% Uptake		33	NA	96	1	3	-	1	99		
	Average price per tonne: £125	Value (£ 000's)	**£1,769**	£1,769	£0	£25	£0	£1	£0	£0	£26	£18	£1,751

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Pollack	**West of Scotland**	Quota	**396**	251	146							87	309
Pollachius pollachius		% Quota		63	37							22	78
POL	*Vb (EC), VI, XII, XIV*	Catch	**51**	21	29	14	12	29	-	12	44		
		Uptake %		9	20	26	22	52	-	22	78		
	Average price per tonne: £2,087	Value (£ 000's)	**£827**	£523	£304	£30	£26	£61	£0	£26	£91	£182	£645
	7	Quota	**13,550**	11,182	2,368							5,819	7,731
		% Quota		83	17							43	57
	VII	Catch	**4,586**	2,899	1,688	816	1,568	1,541	206	1,774	2,357		
	NB - 99% Catches are in Area 7b-k	% Uptake		26	71	20	38	37	5	43	57		
	Average price per tonne: £2,087	Value (£ 000's)	**£28,274**	£23,333	£4,941	£1,703	£3,272	£3,215	£430	£3,702	£4,918	£12,143	£16,131

Plaice

Pleuronectes platessa

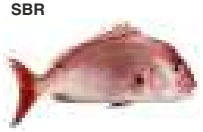
PLE

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**80,608**	60,849	19,759							48,772	31,836
		% Quota		75	25							61	39
IIa (EC), IV		Catch	**67,233**	50,669	16,564	18,258	31,350	7,926	8,762	40,112	26,184		
		% Uptake		83	84	28	47	12	13	61	39		
Average price per tonne: £1,086		Value (£ 000's)	**£87,562**	£66,098	£21,464	£19,833	£34,054	£8,610	£9,518	£43,572	£28,442	£52,979	£34,583
West of Scotland		Quota	**672**	278	394							142	530
		% Quota		41	59							21	79
Vb (EC), VI, XII, XIV		Catch	**59**	21	38	8	12	38	..	12	46		
	Uptake	%	8	10	14	21	65	..		21	79		
Average price per tonne: £1,086		Value (£ 000's)	**£730**	£302	£428	£9	£13	£41	£0	£13	£50	£154	£575
7a		Quota	**1,717**	1,223	494							161	1,556
		% Quota		71	29							9	91
VIIa		Catch	**401**	284	117	257	39	121	..	39	378		
		% Uptake		23	24	62	9	29	..	9	91		
Average price per tonne: £1,086		Value (£ 000's)	**£1,865**	£1,328	£537	£279	£42	£131	£0	£43	£410	£175	£1,690
7de		Quota	**5,427**	3,919	1,508							1,224	4,204
		% Quota		72	28							23	77
VIId, e		Catch	**5,067**	3,577	1,490	2,051	1,014	1,456	7	1,021	3,507		
		% Uptake		91	99	45	22	32	..	23	77		
Average price per tonne: £1,086		Value (£ 000's)	**£5,895**	£4,258	£1,638	£2,228	£1,101	£1,581	£8	£1,109	£3,809	£1,329	£4,566
7fg		Quota	**415**	372	43							75	340
		% Quota		90	10							18	82
VIIf, g		Catch	**413**	372	41	278	71	46	1	72	324		
		% Uptake		100	96	70	18	12	..	18	82		
Average price per tonne: £1,086		Value (£ 000's)	**£451**	£404	£47	£302	£77	£50	£1	£78	£352	£82	£369
7hjk		Quota	**179**	142	37							105	73
		% Quota		80	20							59	41
VIIh, j, k		Catch	**161**	127	34	29	87	33	1	89	62		
		% Uptake		90	93	19	58	22	1	59	41		
Average price per tonne: £1,086		Value (£ 000's)	**£194**	£154	£40	£31	£95	£36	£1	£96	£67	£114	£80

Red Seabream

Pagellus bogaraveo

SBR



		Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
6-8	Quota	**219**	205	14							180	39
	% Quota		94	6							82	18
VI, VII and VIII (EC and International)	Catch	**190**	187	3	21	104	3	3	107	23		
	% Uptake		91	23	16	80	2	2	82	18		
Average price per tonne: £2,000	Value (£ 000's)	**£438**	£410	£28	£41	£208	£6	£6	£214	£47	£359	£79

Roundnose Grenadier

Coryphaenoides rupestris

RNG

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
1, 2, 4 & 5a		Quota	**3**	3	..							-	3
		% Quota		88	13							-	100
I, II, IV and Va (EC and International)		Catch	**1**	1	..	-	-	..	-	-	..		
		% Uptake		22	15	-	-	100	-	-	100		
Average price per tonne: £700		Value (£ 000's)	**£2**	£2	£0	£0	£0	£0	£0	£0	£0	£0	£2
5b, 6 & 7		Quota	**3,681**	3,501	180							742	2,939
		% Quota		95	5							20	80
Vb, VI, VII		Catch	**1,251**	1,242	9	679	174	9	-	174	688		
NB - 94% Catches are in Area 6		% Uptake		35	5	79	20	1	-	20	80		
Average price per tonne: £700		Value (£ 000's)	**£2,577**	£2,451	£126	£475	£122	£7	£0	£122	£482	£519	£2,058

Saithe

Pollachius virens

POK

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**42,490**	32,431	10,059							18,771	23,719
		% Quota		76	24							44	56
IIa (EC), IV		Catch	**37,835**	28,055	9,780	10,872	11,920	6,174	1,570	13,490	17,047		
		% Uptake		87	97	36	39	20	5	44	56		
Average price per tonne: £952		Value (£ 000's)	**£40,456**	£30,879	£9,577	£10,352	£11,350	£5,879	£1,495	£12,844	£16,231	£17,872	£22,584
West of Scotland		Quota	**9,819**	5,242	4,576							491	9,327
		% Quota		53	47							5	95
Vb (EC), VI, XII, XIV		Catch	**7,011**	3,177	3,834	2,401	313	3,538	-	313	5,939		
		% Uptake		61	84	38	5	57	-	5	95		
Average price per tonne: £952		Value (£ 000's)	**£9,349**	£4,991	£4,357	£2,286	£298	£3,369	£0	£298	£5,655	£468	£8,881
7		Quota	**3,286**	2,851	434							2,686	600
		% Quota		87	13							82	18
VII, VIII, IX, X; COPACE 34.1.1(EC)		Catch	**1,254**	1,118	136	122	905	91	49	954	213		
		% Uptake		39	31	10	78	8	4	82	18		
Average price per tonne: £952		Value (£ 000's)	**£3,128**	£2,715	£414	£116	£862	£87	£47	£908	£203	£2,557	£571

Sandeels

Ammodytes spp

SAN

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**234,528**	231,231	3,297							87,014	147,514
		% Quota		99	1							37	63
IIa (EC), IIIa, IV (EC)		Catch	**217,786**	215,285	2,501	141,533	85,164	3,026	107	85,272	144,559		
		% Uptake		93	76	62	37	1	..	37	63		
Average price per tonne: £1,499		Value (£ 000's)	**£351,556**	£346,613	£4,942	£212,157	£127,660	£4,536	£161	£127,821	£216,693	£130,434	£221,122

Sprats

Sprattus sprattus

SPR

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**149,481**	146,073	3,408							105,544	43,937
		% Quota		98	2							71	29
IIa (EC), IV (EC)		Catch	**106,847**	105,499	1,348	30,653	75,886	1,016	189	76,075	31,669		
		% Uptake		72	40	28	70	1	..	71	29		
Average price per tonne: £250		Value (£ 000's)	**£37,370**	£36,518	£852	£7,663	£18,971	£254	£47	£19,019	£7,917	£26,386	£10,984
7de		Quota	**5,187**	1,294	3,892							7	5,180
		% Quota		25	75							..	100
VIId, e		Catch	**3,667**	69	3,598	73	4	3,913	1	5	3,986		
		% Uptake		5	92	2	..	98	..	..	100		
Average price per tonne: £250		Value (£ 000's)	**£1,297**	£324	£973	£18	£1	£978	£0	£1	£996	£2	£1,295

Sole

Solea solea

SOL

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**15,516**	14,439	1,077							5,069	10,447
		% Quota		93	7							33	67
II, IV		Catch	**11,919**	11,120	799	7,037	3,450	565	238	3,688	7,601		
		% Uptake		77	74	62	31	5	2	33	67		
Average price per tonne: £7,845		Value (£ 000's)	**£121,729**	£113,277	£8,452	£55,207	£27,070	£4,430	£1,865	£28,936	£59,637	£39,767	£81,962
West of Scotland		Quota	**59**	47	12							46	13
		% Quota		80	20							78	22
Vb (EC), VI, XII, XIV		Catch	**19**	16	3	1	14	3	-	14	4		
		% Uptake		34	24	6	78	16	-	78	22		
Average price per tonne: £7,845		Value (£ 000's)	**£463**	£372	£91	£9	£107	£22	£0	£107	£31	£359	£103
7a		Quota	**301**	255	46							8	293
		% Quota		85	15							3	97
VIIa		Catch	**218**	202	16	212	6	17	..	6	229		
		% Uptake		79	35	90	3	7	..	3	97		
Average price per tonne: £7,845		Value (£ 000's)	**£2,361**	£2,002	£359	£1,660	£47	£135	£0	£47	£1,795	£60	£2,301
7d		Quota	**5,639**	4,641	998							1,746	3,893
		% Quota		82	18							31	69
VIId		Catch	**4,294**	3,651	643	2,029	1,168	581	3	1,171	2,610		
		% Uptake		79	64	54	31	15	..	31	69		
Average price per tonne: £7,845		Value (£ 000's)	**£44,242**	£36,413	£7,828	£15,916	£9,162	£4,557	£23	£9,185	£20,473	£13,702	£30,540
7e		**Quota**	**817**	**340**	**477**							**195**	**622**
		% Quota		42	58							24	76
VIIe		Catch	**777**	319	458	75	180	508	3	182	583		
		% Uptake		94	96	10	23	66	..	24	76		
Average price per tonne: £7,845		Value (£ 000's)	**£6,409**	£2,668	£3,741	£585	£1,409	£3,989	£21	£1,430	£4,574	£1,527	£4,882
7fg		Quota	**1,176**	909	267							19	1,157
		% Quota		77	23							2	98
VIIf, g		Catch	**1,008**	814	194	826	17	202	..	17	1,028		
		% Uptake		90	73	79	2	19	..	2	98		
Average price per tonne: £7,845		Value (£ 000's)	**£9,229**	£7,133	£2,096	£6,482	£132	£1,584	£1	£132	£8,066	£149	£9,080
7hjk		Quota	**438**	357	82							241	197
		% Quota		81	19							55	45
VIIh, j, k		Catch	**222**	172	50	44	112	49	2	113	93		
		% Uptake		48	62	21	54	24	1	55	45		
Average price per tonne: £7,845		Value (£ 000's)	**£3,439**	£2,799	£640	£346	£876	£381	£13	£889	£727	£1,892	£1,547

Shrimps (Northern Prawn)

Pandalus borealis

PRA

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**2,178**	1,712	466							1,677	501
		% Quota		79	21							77	23
IIa (EC), IV (EC)		Catch	**54**	54	..	41	138	..	-	138	41		
		% Uptake		3	..	23	77	..	-	77	23		
Average price per tonne: £2,393		Value (£ 000's)	**£5,213**	£4,098	£1,115	£98	£331	£0	£0	£331	£99	£4,014	£1,199

Skates and Rays

SRX, RJA, RJB, RJC, RJE, RJF, RJH, RJI, RJM, RJN, RJO, RJR, RJS, RJU

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**1,449**	652	797							107	1,342
		% Quota		45	55							7	93
IIa (EC), IV (EC)		**Catch**	**1,302**	**587**	**715**	**260**	**30**	**216**	**8**	**38**	**475**		
		% Uptake		90	90	51	6	42	2	7	93		
Average price per tonne: £1,315		Value (£ 000's)	**£1,905**	£857	£1,048	£341	£39	£283	£11	£50	£625	£141	£1,764
7d		Quota	**903**	767	136							180	723
		% Quota		85	15							20	80
		Catch	**830**	714	115	134	43	42	1	44	176		
		% Uptake		93	85	61	20	19	..	20	80		
Average price per tonne: £1,315		Value (£ 000's)	**£1,187**	£1,009	£179	£176	£57	£55	£1	£58	£231	£237	£950
6 & 7		Quota	**10,981**	8,216	2,765							675	10,306
		% Quota		75	25							6	94
VI (EC), VII (EC) (ex VIId)		Catch	**8,532**	6,595	1,938	981	49	385	40	89	1,366		
NB - All Catches are in area VII		% Uptake		80	70	67	3	26	3	6	94		
Average price per tonne: £1,315		Value (£ 000's)	**£14,437**	£10,801	£3,635	£1,290	£64	£506	£53	£118	£1,796	£887	£13,550

Spurdog

Squalus acanthias

DGS

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**7**	3	4							5	3
		% Quota		46	54							63	37
IIa (EC), IV (EC)		Catch	**10**	6	4	4	13	4	..	13	8		
		% Uptake		182	90	20	62	17	1	63	37		
		Value (£ 000's)	**-**	-	-	-	-	-	-	-	-	-	-
West Coast		Quota	**28**	19	9							11	16
		% Quota		69	31							41	59
I, V, VI, VII, VIII, XII and XIV (EC and Int)		Catch	**49**	42	8	39	35	11	..	35	50		
		% Uptake		**220**	**88**	**46**	**41**	**13**	..	**41**	**59**		
		Value (£ 000's)	**-**	-	-	-	-	-	-	-	-	-	-

Turbot and Brill

Psetta maxima, Scophthalmus rhombus

TUR, BLL

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
North Sea		Quota	**4,661**	4,053	608							2,746	1,915
		% Quota		87	13							59	41
IIa (EC), IV (EC)		Catch	**3,996**	3,515	481	884	1,340	185	193	1,533	1,069		
		% Uptake		87	79	34	51	7	7	59	41		
Average price per tonne: £8,470		Value (£ 000's)	**£39,479**	£34,327	£5,151	£7,490	£11,349	£1,565	£1,638	£12,987	£9,055	£23,261	£16,218

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Tusk	**4 (EC waters)**	Quota	**229**	132	98							69	161
Brosme brosme		% Quota		57	43							30	70
USK	*IV (EC and International)*	Catch	**89**	17	72	16	34	65	1	35	81		
		% Uptake		13	73	14	29	56	1	30	70		
	**Average price per tonne: £1,000**	Value (£ 000's)	**£229**	£132	£98	£16	£34	£65	£1	£35	£81	£69	£161
	5-7	Quota	**562**	413	149							32	530
		% Quota		73	27							6	94
	V, VI, VII (EC and International)	Catch	**309**	249	59	184	14	48	1	14	232		
	All Catches are in Area VI	% Uptake		60	40	75	6	20	..	6	94		
	Average price per tonne: £1,000	Value (£ 000's)	**£562**	£413	£149	£184	£14	£48	£1	£14	£232	£32	£530

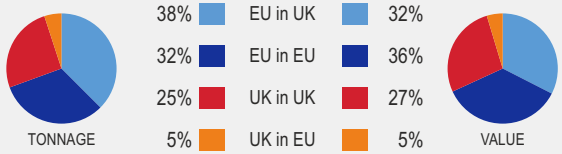
			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Whiting	**North Sea**	Quota	**14,457**	4,312	10,146							928	13,530
Merlangius merlangus		% Quota		30	70							6	94
WHG	*IIa (EC), IV*	Catch	**12,229**	2,718	9,511	3,583	525	8,895	330	855	12,478		
		% Uptake		63	94	27	4	67	2	6	94		
	Average price per tonne: £1,050	Value (£ 000's)	**£15,188**	£4,530	£10,658	£3,764	£552	£9,344	£347	£899	£13,108	£974	£14,213
	West of Scotland	Quota	**365**	163	202							80	285
		% Quota		45	55							22	78
	Vb (EC), VI, XII, XIV	Catch	**261**	107	153	50	55	145	-	55	196		
		% Uptake		66	76	20	22	58	-	22	78		
	**Average price per tonne: £1,050**	Value (£ 000's)	**£383**	£171	£212	£53	£58	£153	£0	£58	£206	£84	£299
	7a	Quota	**118**	84	34							9	109
		% Quota		**71**	**29**							**7**	**93**
	VIIa	Catch	**89**	76	13	10	1	12	..	2	22		
		% Uptake		90	39	42	5	51	2	7	93		
	Average price per tonne: £1,050	Value (£ 000's)	**£124**	£88	£35	£10	£1	£13	£1	£2	£23	£9	£115
	7b-k	Quota	**20,827**	19,270	1,558							7,190	13,637
		% Quota		93	7							35	65
	VII (ex VIIa)	Catch	**15,210**	14,134	1,077	8,072	4,742	1,089	87	4,830	9,160		
		% Uptake		73	69	58	34	8	1	35	65		
	Average price per tonne: £1,050	Value (£ 000's)	**£21,879**	£20,243	£1,636	£8,479	£4,982	£1,144	£92	£5,073	£9,623	£7,553	£14,326

			Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit
Queenies		Catch				613	164	10,694	1	165	11,307		
Aequipecten opercularis		% Uptake				5	1	93	..	1	99		
QSC	Average price per tonne: £550	Value (£ 000's)				£337	£90	£5,882	£1	£91	£6,219		
Crabs		Catch				2,322	9,131	26,584	1,955	11,086	28,906		
Cancer pagurus		% Uptake				6	23	66	5	28	72		
CRE, LIO	Average price per tonne: £1,330	Value (£ 000's)				£3,087	£12,141	£35,350	£2,600	£14,741	£38,437		
Cuttlefish		Catch				1,445	6,041	3,058	37	6,079	4,503		
Sepiidae, Sepiolidae		% Uptake				14	57	29	..	57	43		
CTL	Average price per tonne: £2,118	Value (£ 000's)				£3,060	£12,796	£6,477	£79	£12,875	£9,537		
Lobsters		Catch				45	494	3,365	27	521	3,410		
Homarus gammarus		% Uptake				1	13	86	1	13	87		
LBE	Average price per tonne: £9,981	Value (£ 000's)				£450	£4,934	£33,585	£265	£5,199	£34,035		
Scallops		Catch				2,282	9,534	27,505	1,986	11,520	29,786		
Pecten maximus		% Uptake				6	23	67	5	28	72		
SCE	Average price per tonne: £1,302	Value (£ 000's)				£2,971	£12,414	£35,811	£2,585	£14,999	£38,782		
Squid		Catch				774	4,392	2,487	278	4,670	3,261		
Loligo vulgaris		% Uptake				10	55	31	4	59	41		
SQR, SQC, SQE, SQI, SQU, SQS	Average price per tonne: £3,500	Value (£ 000's)				£2,708	£15,371	£8,704	£974	£16,345	£11,412		
Whelks		Catch				928	4,534	19,765	283	4,816	20,692		
Buccinum undatum		% Uptake				4	18	77	1	19	81		
WHE	Average price per tonne: £729	Value (£ 000's)				£676	£3,305	£14,407	£206	£3,511	£15,083		
John Dory		Catch				495	613	250	79	693	745		
Zeus faber		% Uptake				34	43	17	6	48	52		
JOD	Average price per tonne: £6,347	Value (£ 000's)				£3,140	£3,891	£1,586	£504	£4,395	£4,726		
Bass		**Catch**				**1,161**	**2,812**	**850**	**8**	**2,819**	**2,010**		
Dicentrarchus labrax		% Uptake				24	58	18	..	58	42		
BSS	Average price per tonne: £7,096	Value (£ 000's)				£8,235	£19,952	£6,029	£54	£20,007	£14,264		
Red Mullet		Catch				480	1,136	-	-	1,136	480		
Mullus barbatus		% Uptake				30	70	-	-	70	30		
MUT	Average price per tonne: £7,929	Value (£ 000's)				£3,807	£9,005	£0	£0	£9,005	£3,807		
Turbot	*VI, VII*	Catch				404	350	345	35	386	748		
Psetta maxima		% Uptake				36	31	30	3	34	66		
TUR	Average price per tonne: £8,470	Value (£ 000's)				£3,418	£2,966	£2,919	£299	£3,265	£6,338		
Brill	*VI, VII*	Catch				232	73	262	6	79	494		
Scophthalmus rhombus		% Uptake				41	13	46	1	14	86		
BLL	Average price per tonne: £5,661	Value (£ 000's)				£1,314	£413	£1,482	£35	£448	£2,796		
Halibut	*IIa, IV, V, VI, VII*	Catch				9	39	73	10	49	82		
Hippoglossus hippoglossus		% Uptake				7	30	56	8	37	63		
HAL	Average price per tonne: £9,274	Value (£ 000's)				£85	£360	£676	£94	£454	£760		
Red Gurnard and Tub Gurnard		Catch				1,386	424	512	49	473	1,898		
Aspitrigla cuculus, Chelidonichthys lucerna		% Uptake				58	18	22	2	20	80		
GUR, GUU	Average price per tonne: £671	Value (£ 000's)				£930	£285	£343	£33	£318	£1,273		

DATABASE INFORMATION TOTALS

	Total Avg	EU Avg	UK Avg	EU in UK	EU in EU	UK in UK	UK in EU	EU Waters Total	UK Waters Total	EU Post Brexit	UK Post Brexit	EU Total Catch	UK Total Catch	Total Catch
TAC species (t)				662,026	528,838	365,298	83,371	612,208	1,027,324			1,190,864	448,669	1,639,533
TAC species (£,000)				£677,008	£679,158	£440,349	£94,408	£773,565	£1,117,357			£1,356,166	£534,757	£1,890,923
Non-TAC species (t)				12,575	39,737	95,748	4,755	44,492	108,323			52,312	100,502	152,814
Non-TAC species (£,000)				£34,220	£97,923	£153,251	£7,729	£105,652	£187,470			£132,142	£160,980	£293,122
TOTAL QUOTA	**1,996,031**	**1,494,017**	**502,014**							**776,225**	**1,219,806**			
TOTAL CATCH	**1,688,660**	**1,230,956**	**457,705**	**674,601**	**568,575**	**461,046**	**88,126**	**656,700**	**1,135,647**			**1,243,176**	**549,172**	**1,792,348**
TOTAL (£,000)	**£2,724,850**	**£2,089,334**	**£635,516**	**£711,227**	**£777,081**	**£593,600**	**£102,136**	**£879,217**	**£1,304,827**	**£1,329,341**	**£1,395,509**	**£1,488,309**	**£695,736**	**£2,184,045**

AREAS OF TOTAL CATCHES PER EU AND UK



UK POST-BREXIT GAINS

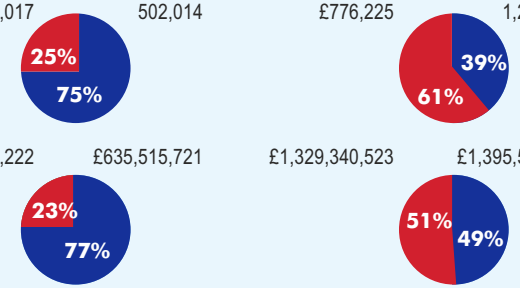
UK Gains Non TAC Tonnage	7,820
UK Gains Non TAC Value	£26,490,772
UK Gains TAC Tonnage	717,792
UK Gains TAC Value	£759,993,699
UK Gains Total Tonnage	725,612
UK Gains Total Value	£786,484,471

AMOUNT OF PARTIES TOTAL CATCH IN OTHERS WATERS

	Tonnage	% (T)	Value	% (£)
EU Catch in UK	674,601	54%	£711,227,473	48%
UK Catch in EU	88,126	16%	£102,136,393	15%

SHARES OF TACs - CURRENT AND POST BREXIT

	Current EU	Current UK	Post Brexit EU	Post Brexit UK	TOTAL
TONNAGE	1,494,017	502,014	£776,225	1,219,806	**1,996,031**
VALUE	£2,089,334,222	£635,515,721	£1,329,340,523	£1,395,509,421	**£2,724,849,944**

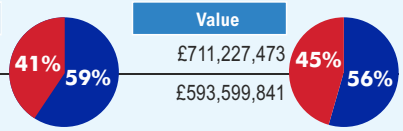


243% INCREASE IN UK TAC

220% INCREASE IN UK VALUE

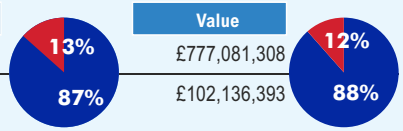
CATCHES IN BRITISH WATERS BY EU & UK VESSELS

	Tonnage	Value
EU Catch in UK	674,601	£711,227,473
UK Catch in UK	461,045	£593,599,841



CATCHES IN EUROPEAN WATERS BY EU & UK VESSELS

	Tonnage	Value
EU Catch in EU	568,575	£777,081,308
UK Catch in EU	88,126	£102,136,393



CURRENT AND POST BREXIT VALUE OF UK FISHING

	Tonnage	% increase (t)	Value	% increase (£)
Current UK	602,516		£796,495,241	
Post Brexit UK	1,328,128	x 220.4%	£1,582,979,712	x 198.7%

TABLE DISCLAIMERS

1) Following figures are an annual average taken from results from 2010 - 2014. Some species are based on less than 5 year results, no less than 2 years, due to paucity of data.

2) All figures in Source 1 are derived from the EU Control Regulation data which the MMO compiles to produce the annual TAC, Quota and Uptake tables by EU Member States.

3) All figures in Source 2 are derived from EU Commission's STECF Data Collection Framework (DCF) data which is derived from vessels e-log books.

4) Please note that in some instances there is a discrepancy between each set of figures. However, the Source 2 data gives a proportional representation of catches between EU vs UK. This is adequate for the purpose of establishing a catching ration EU vs UK in each parties respective waters to allow a new post Brexit TAC allocation ratio to be established.

5) This document does not include catching figures by Faroese or Norwegian vessels in UK or EU waters or for British or European vessels fishing in Faroe or Norway waters. This document is purely to establish a 'divorce' settlement between the UK and EU as Britain reclaims her natural position as an independent nation and coastal state with ownership of her fisheries EEZ and "all resource therein" as per the terms of UNCLOS 3.

6) Mackerel – West Coast and North Sea. Figures for both areas have been adjusted through a proportional calculation to correctly appropriate the catches to both areas. This accounts for the Special Allowance dispensation that allows West Coast mackerel TAC to be caught in the North Sea.

   *Union waters of IIa & IVa. During the periods from 1 January to 15 February 2014 and from 1 September to 31 December 2014 (MAC/*4A-EN)*

   Original download figures for Mackerel are in Black, adjusted figures in Red.

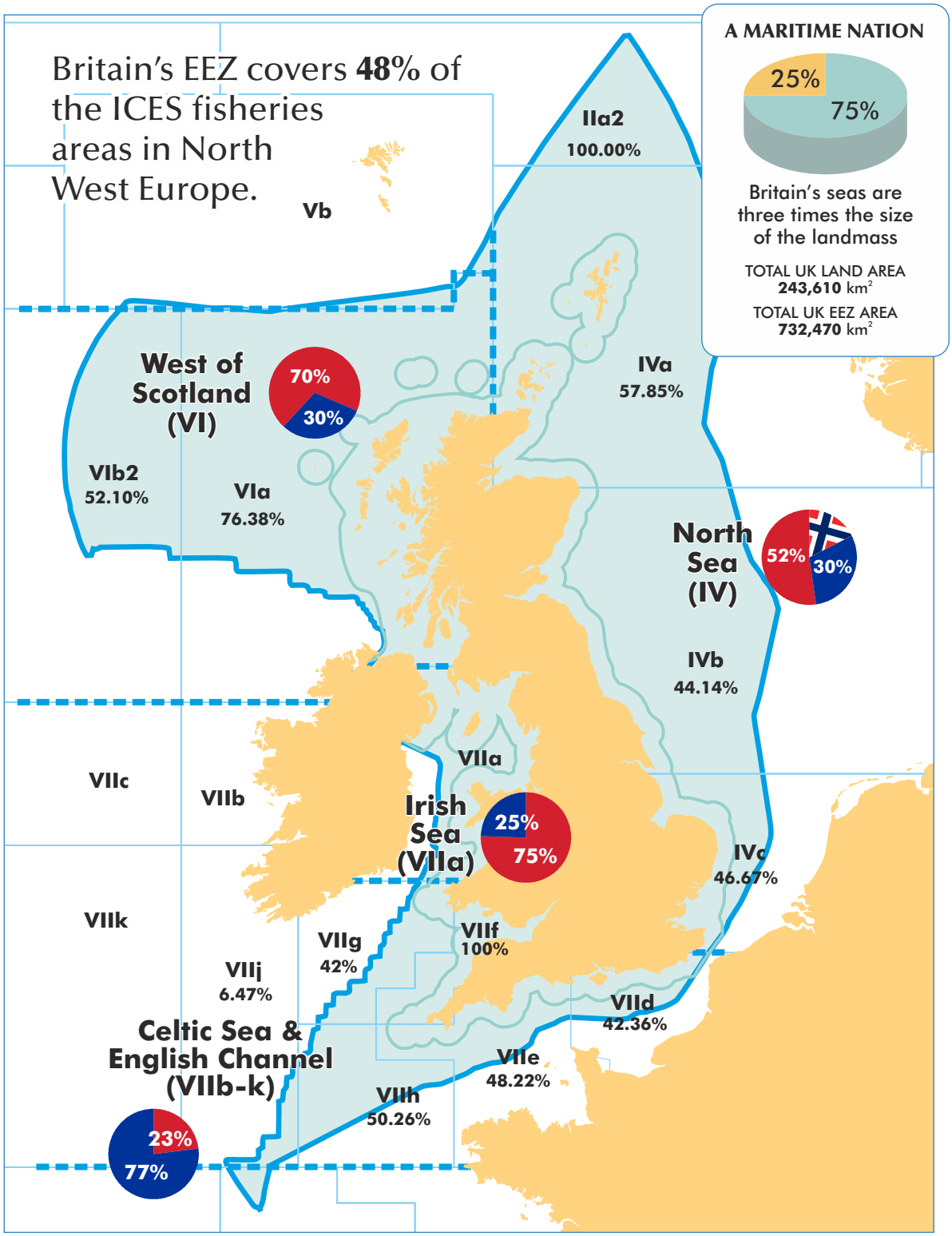
7) Prices for species (with the exception of these listed in points 8 and below 9) are derived from the MMO UK Sea fisheries statistics data.

8) Prices for species John Dory and Red Mullet are derived from Plymouth Trawler Agents.

9) Price for species Black Scabbard, Blue Ling, Greater Forkbeard, Grenadier and Tusk are derived from Don Fishing, Kinlochbervie.

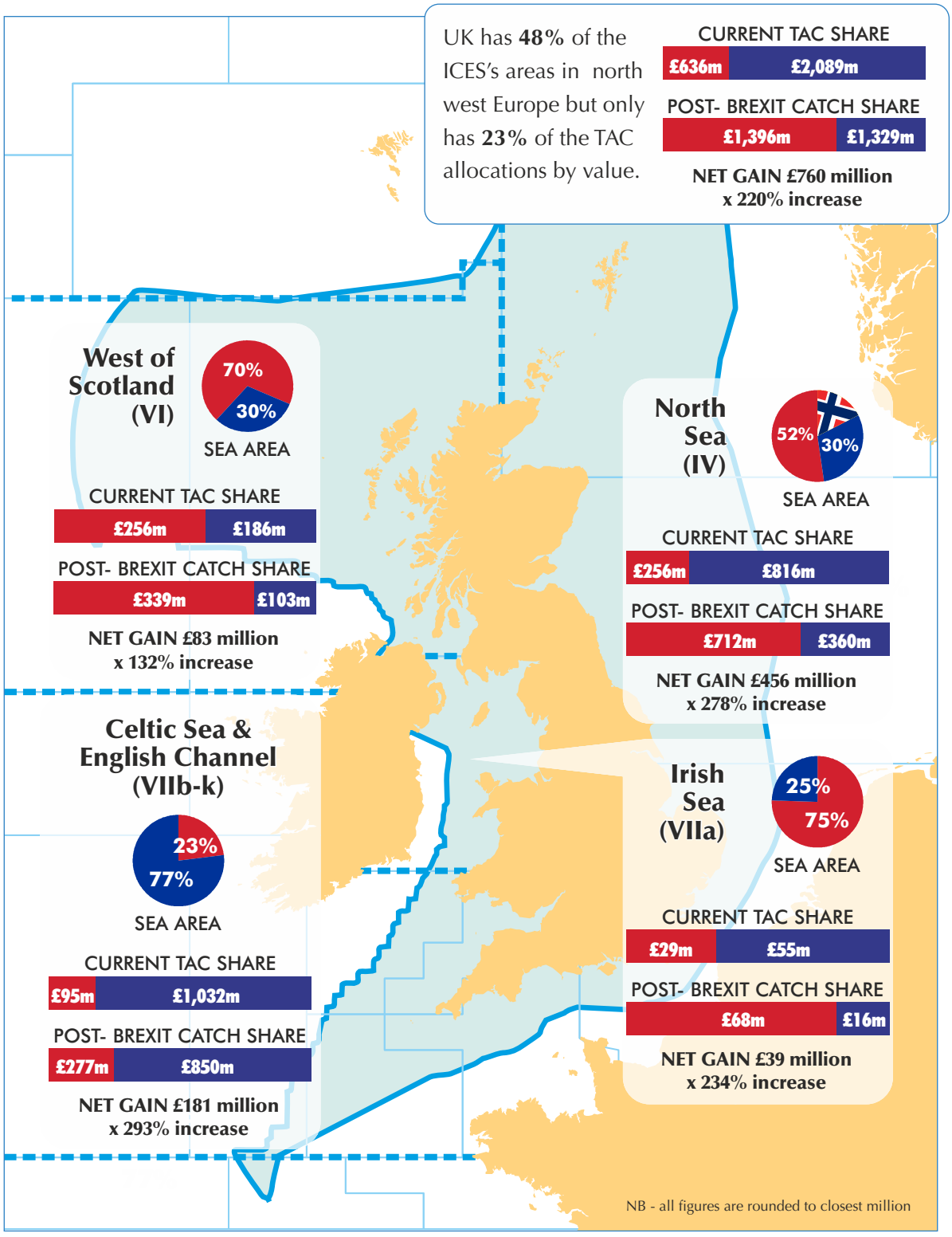
10) Prices for species which are combined have been found using proportional figures of the tonnage combined with the value.

AREA OF ICESs SUB-AREAS WITHIN UK EEZ



All sea area figures above produced by UK Hydrographic Office

A MARITIME NATION - ROBBED OF ITS RESOURCES



All sea area figures above produced by UK Hydrographic Office

NB - Where TAC allocations transcend two ICES areas in the figures above, the TAC allocation has been assigned to the area where the majority of catches have been taken for the purpose of creating these four regions.

UK vs EU ALL SPECIES

59% of all catches in UK waters are by EU vessels.

13% of all catches in EU waters are by UK vessels.

63% of total catches throughout the EU are caught in UK waters.

54% of EU catches are in UK EEZ.

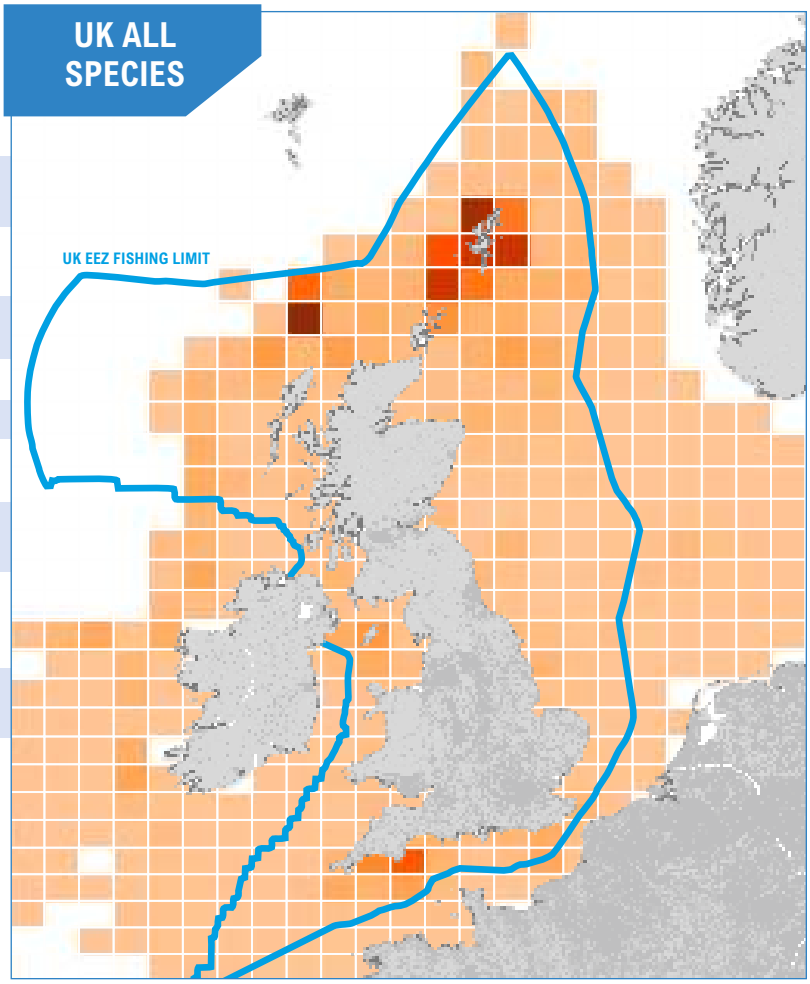
16% of UK catches are in EU EEZ.

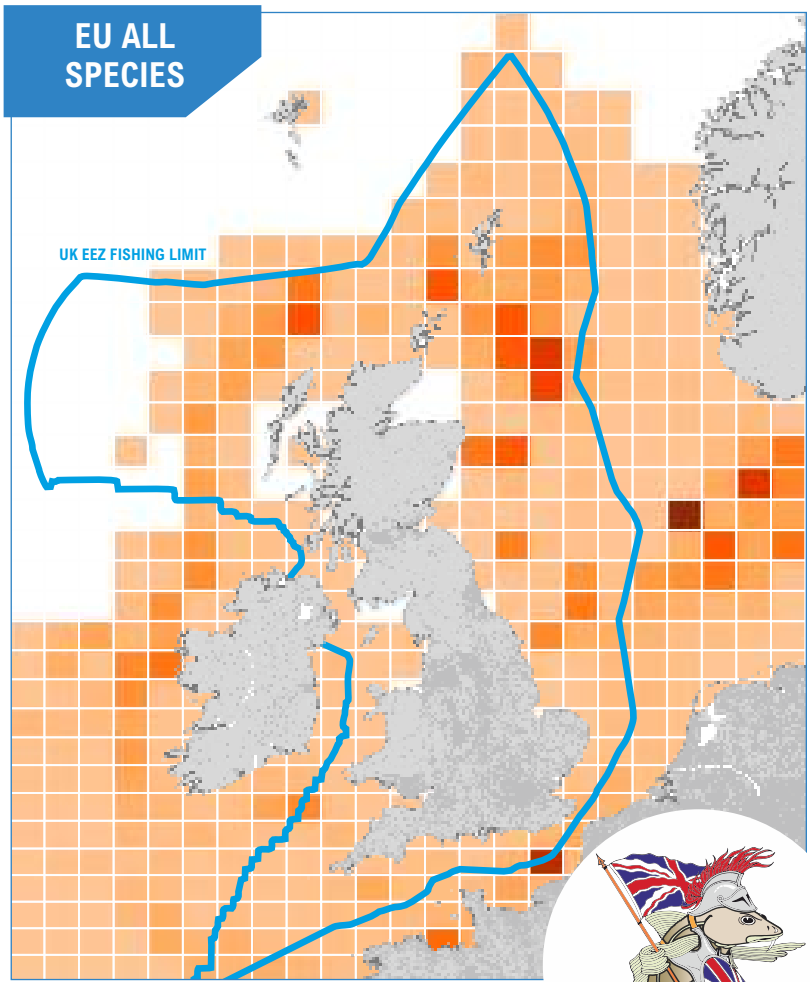
£1,395,509,000 - UK value of TAC species available with Brexit.

£187,471,000 - UK value of non-TAC species available with Brexit.

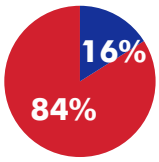
£1,582 million - Value of UK fishing should we reclaim our waters.

199% - Increase in value of UK fishing with Brexit.





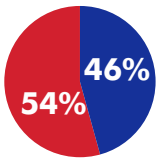
ALL UK CATCHES



UK WATERS
461,046t
£593,600,000

EU WATERS
88,126t
£102,136,000

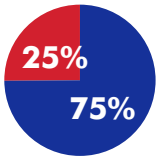
ALL EU CATCHES



UK WATERS
674,601t
£711,227,000

EU WATERS
568,575t
£777,081,000

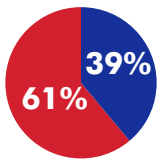
CURRENT TAC SHARE



UK TAC SHARE
502,014t
£635,516,000

EU TAC SHARE
1,494,017t
£2,089,334,000

POST BREXIT SHARE



UK TAC SHARE
1,219,806t
£1,395,509,000

EU TAC SHARE
776,225t
£1,329,341,000

NB// Catch figures include TAC and non-TAC species = Anglers / Monkfish, Black Scabbard Fish, Blue Ling, Cod, Dabs and Flounders, Greater Forkbeard, Greater Silver Smelt, Greenland Halibut, Haddock, Hake, Lemon Sole and Witches, Ling, Megrim, Plaice, Pollack, Red Seabream, Roundnose Grenadier, Saithe, Sandeels, Skates and Rays, Sole, Spurdog, Turbot and Brill, Tusk, Whiting, Bass, Brill, Halibut, John Dory, Red Gurnard & Tub Gurnard, Red Mullet, Turbot, Nephrops, Shrimps (Northern Prawn), Crabs, Cuttlefish, Lobsters, Queenies, Scallops, Squid, Whelks, Albacore, Blue Whiting, Boarfish, Herring, Horse Mackerel, Mackerel, Norway Pout, Sprats

UK vs EU WHITEFISH

71% of Whitefish catches in UK waters are by EU vessels.

11% of Whitefish catches in EU waters are by UK vessels.

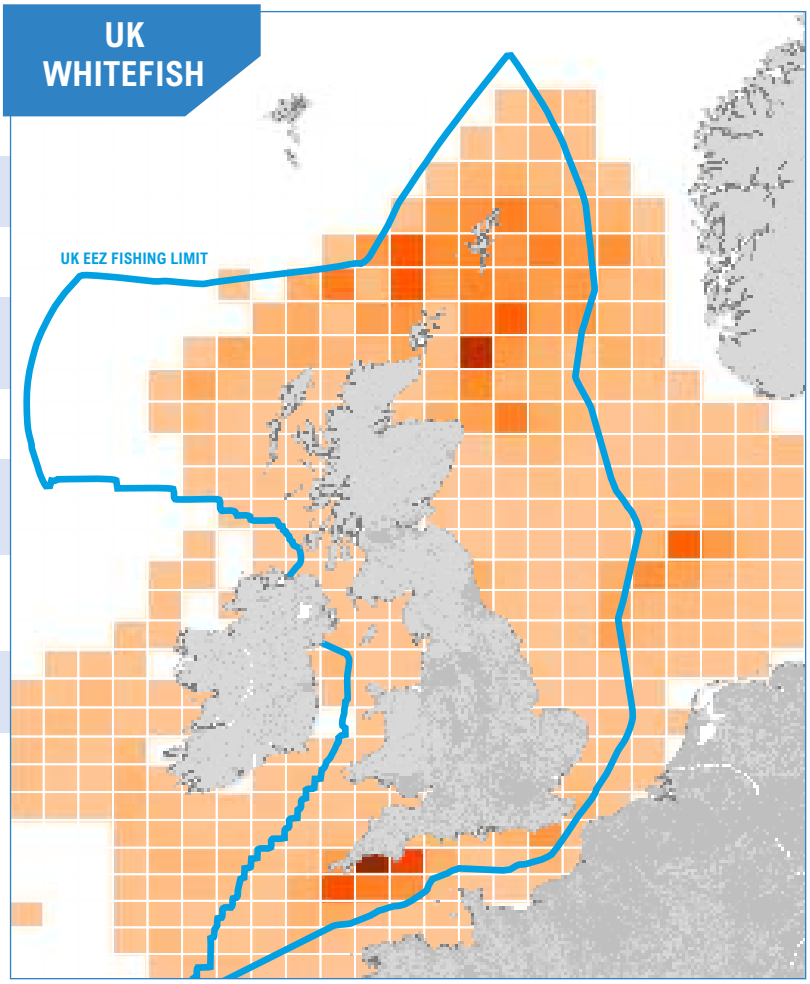
60% of Whitefish catches throughout the EU are caught in UK waters.

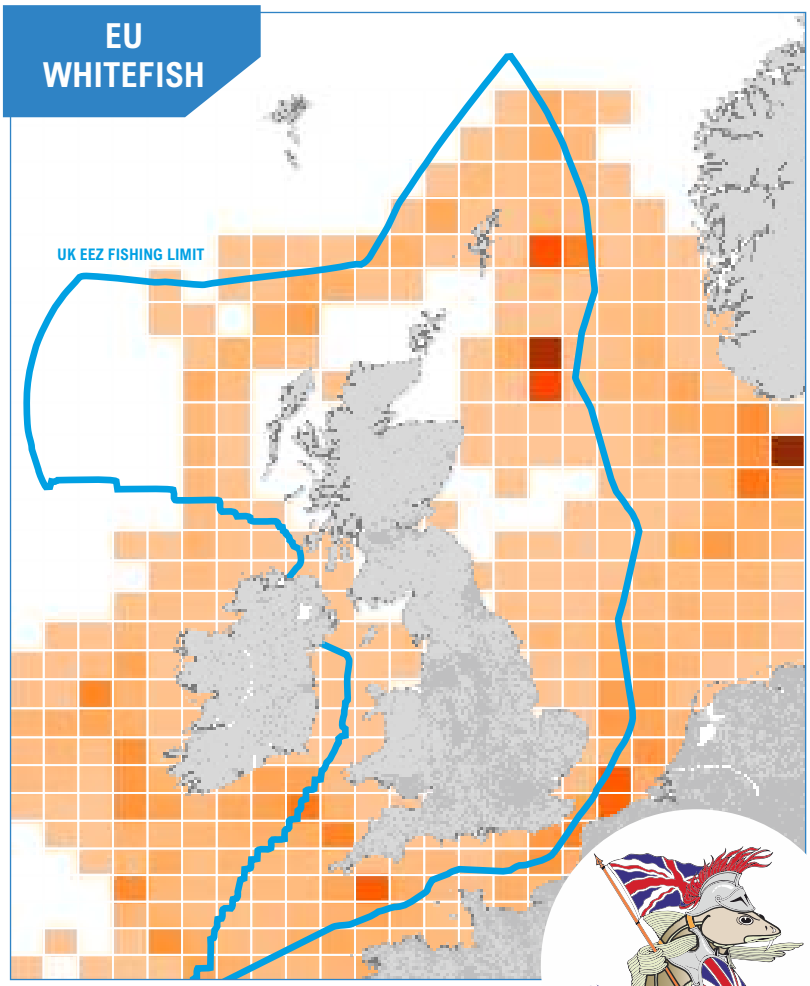
£791,169,000 - UK value of TAC for Whitefish available with Brexit.

£33,965,000 - UK value of non-TAC Whitefish available with Brexit.

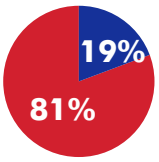
£825,134,000 - Value of UK fishing should we reclaim our waters.

291% - Increase in value of UK Whitefish with Brexit.





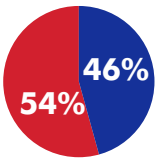
ALL UK CATCHES



UK WATERS
102,031t
£183,762,000

EU WATERS
24,400t
£43,185,000

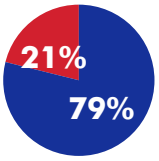
ALL EU CATCHES



UK WATERS
244,713t
£449,710,000

EU WATERS
206,265t
£391,709,000

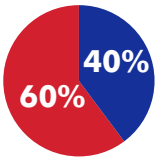
CURRENT TAC SHARE



UK TAC SHARE
153,382t
£269,595,000

EU TAC SHARE
572,243t
£1,045,862,000

POST BREXIT SHARE



UK TAC SHARE
437,198t
£791,169,000

EU TAC SHARE
288,426t
£525,288

1 WHITEFISH TAC SPECIES = Anglers / Monkfish, Black Scabbard Fish, Blue Ling, Cod, Dabs and Flounders, Greater Forkbeard, Greater Silver Smelt, Greenland Halibut, Haddock, Hake, Lemon Sole and Witches, Ling, Megrim, Plaice, Pollack, Red Seabream, Roundnose Grenadier, Saithe, Sandeels, Skates and Rays, Sole, Spurdog, Turbot and Brill, Tusk, Whiting
2 WHITEFISH NON-TAC SPECIES = Bass, Brill, Halibut, John Dory, Red Gurnard & Tub Gurnard, Red Mullet, Turbot
3 NB// Catch figures include TAC and non-TAC species.

UK vs EU SHELLFISH

11% of Shellfish catches in UK waters are by EU vessels.

11% of Shellfish catches in EU waters are by UK vessels.

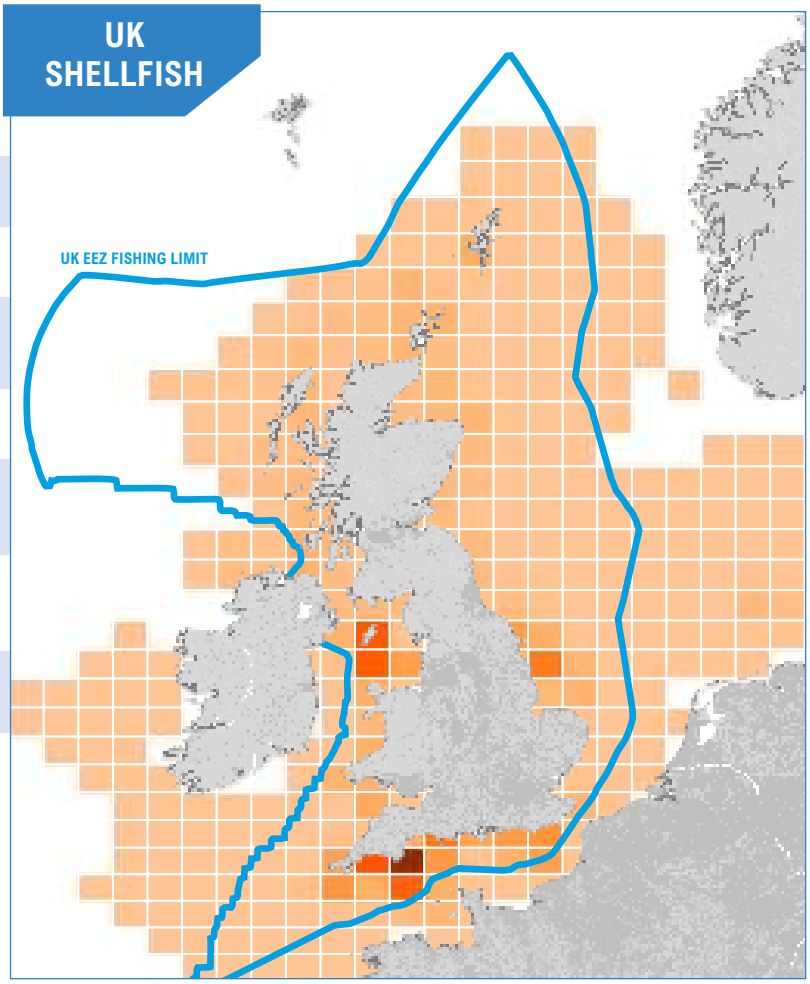
76% of Shellfish catches throughout the EU are caught in UK waters.

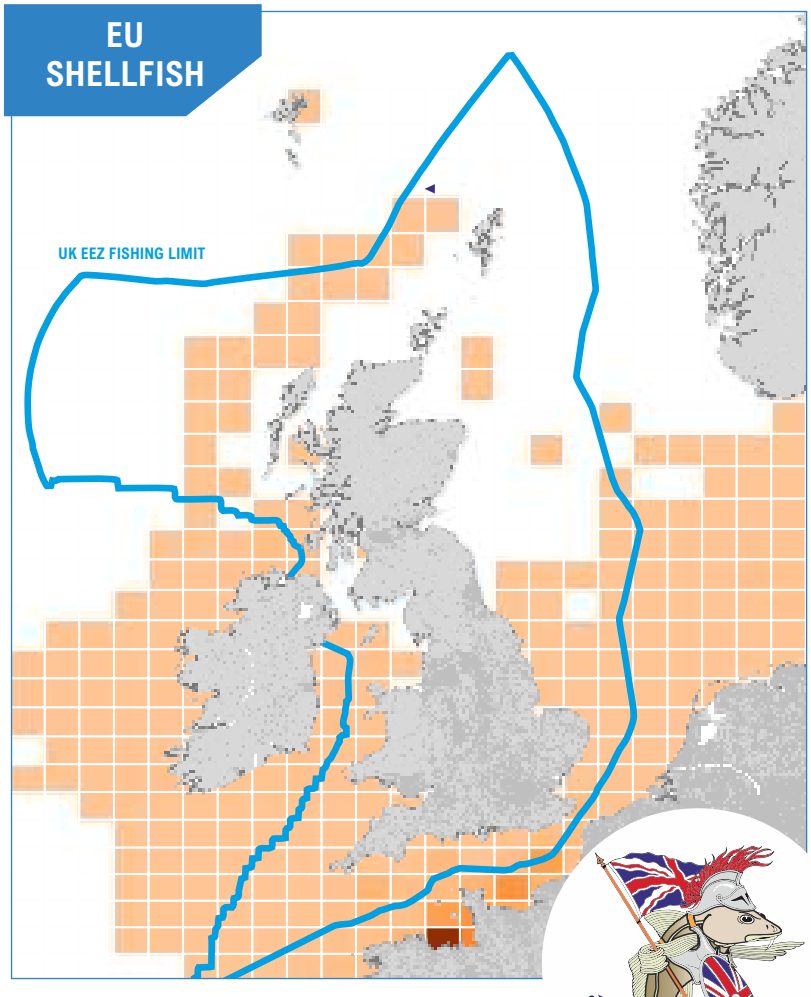
£174,646,000 - UK value of TAC for Shellfish available with Brexit.

£153,505,000 - UK value of non-TAC Shellfish species available with Brexit.

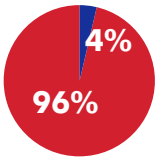
£328,151,000 - Value of UK Shellfish should we reclaim our waters.

232% - Increase in value of UK Shellfish with Brexit.





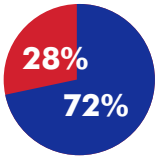
ALL UK CATCHES



UK WATERS
126,116t
£240,800,512

EU WATERS
4,830t
£7,520,300

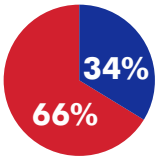
ALL EU CATCHES



UK WATERS
15,637t
£35,524,331

EU WATERS
39,502t
£77,005,932

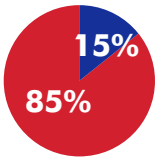
CURRENT TAC SHARE



UK TAC SHARE
43,917t
£134,937,358

EU TAC SHARE
22,355t
£67,673,610

POST BREXIT SHARE



UK TAC SHARE
56,818t
£174,646,353

EU TAC SHARE
9,454t
£27,964,614

1 SHELLFISH TAC SPECIES = Nephrops, Shrimps (Northern Prawn)
2 SHELLFISH NON-TAC SPECIES = Crabs, Cuttlefish, Lobsters, Queenies, Scallops, Squid, Whelks
3 NB// Catch figures include TAC and non-TAC species.

UK vs EU PELAGIC

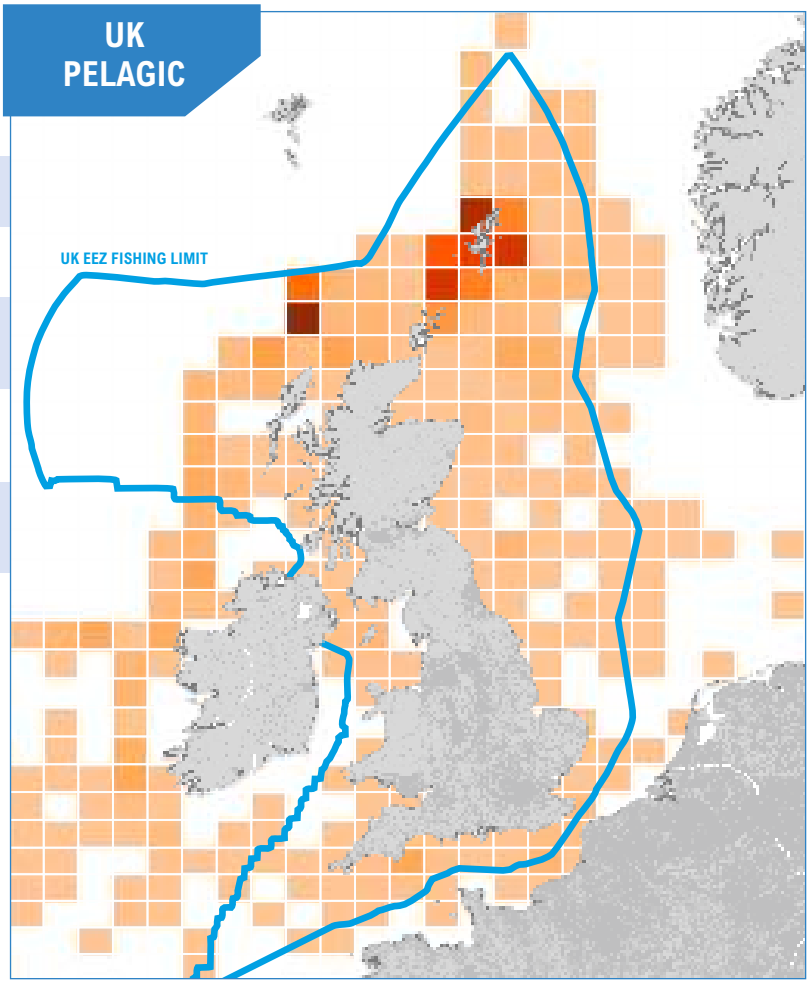
64% of Pelagic catches in UK waters are by EU vessels.

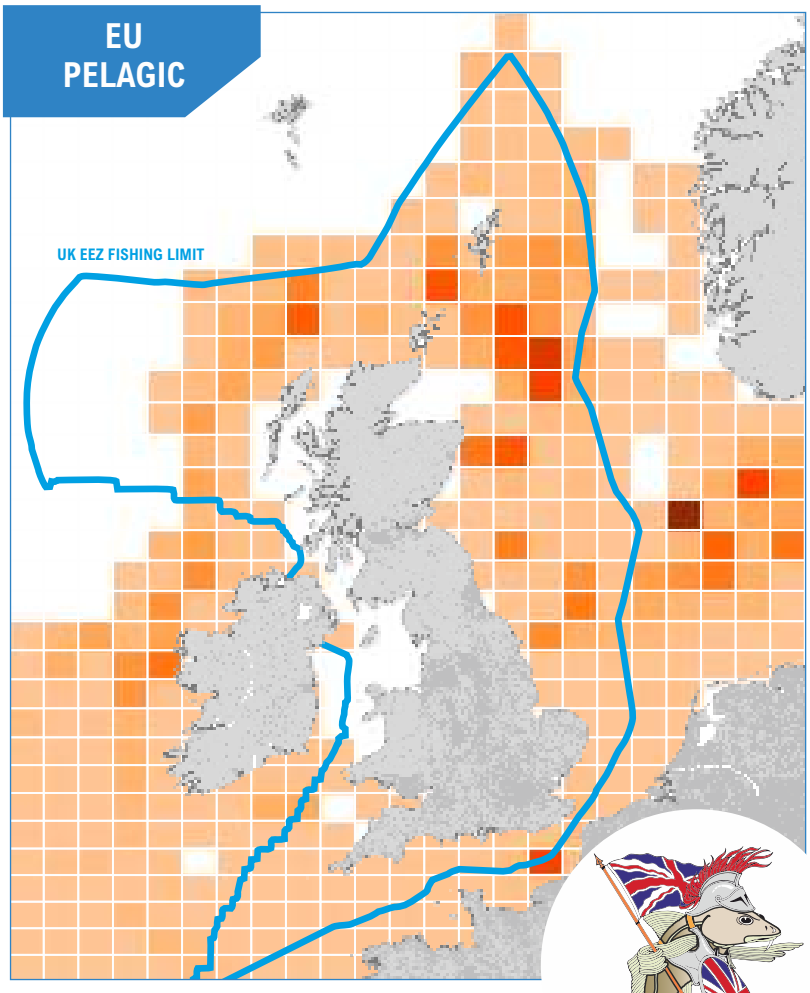
15% of Pelagic catches in EU waters are by UK vessels.

63% of Pelagic catches throughout the EU are caught in UK waters.

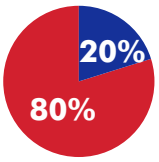
£777,235,000 - UK value for Pelagic available with Brexit should we reclaim our waters.

186% - Increase in value of UK Pelagic with Brexit.





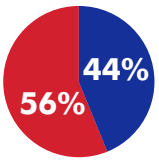
ALL UK CATCHES



UK WATERS
232,898t
£169,037,000

EU WATERS
58,896t
£51,432,000

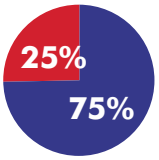
ALL EU CATCHES



UK WATERS
414,251t
£225,992,870

EU WATERS
322,808t
£308,366,959

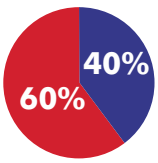
CURRENT TAC SHARE



UK TAC SHARE
304,761t
£231,073,072

EU TAC SHARE
899,450t
£975,856,095

POST BREXIT SHARE



UK TAC SHARE
725,789t
£429,694,249

EU TAC SHARE
478,421t
£777,234,917

PELAGIC SPECIES = Albacore, Blue Whiting, Boarfish, Herring, Horse Mackerel, Mackerel, Norway Pout, Sprats

True worth of fishing to the UK

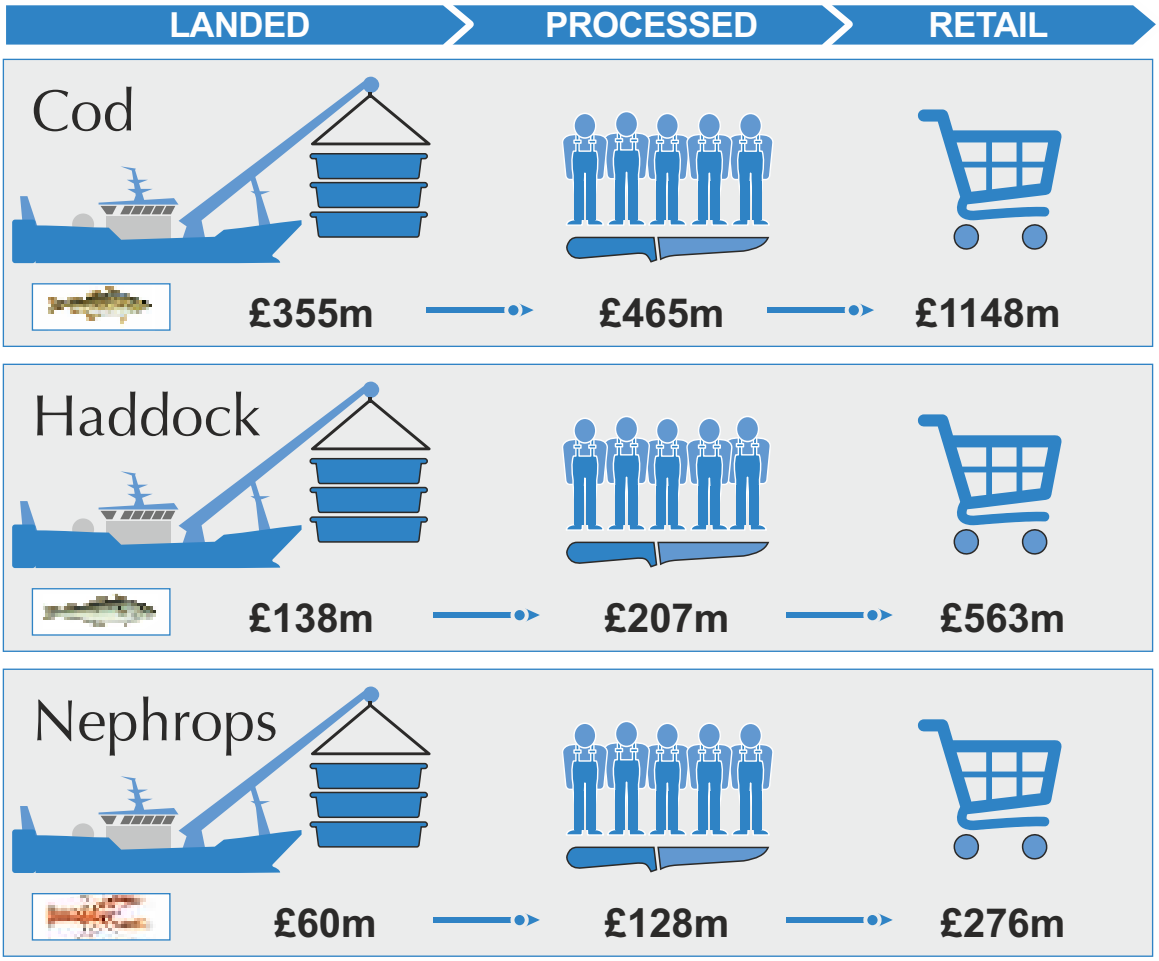
This information shows the value added to seafood through the UK supply chain.

Although for only three species, these figures give an approximate indication of the value added, and therefore the overall financial and social worth of fishing to the British economy.

LANDED This is the value of combined imports and landings by UK and foreign vessels of raw material into the UK supply chain.

PROCESSED This is the value of the outgoing products from the UK processing sector.

RETAIL This is the value of finished product that goes to UK consumers through the foodservice and retail sector, in addition to the flow of raw materials and finished product exported from the UK.



These figures are derived from the Seafish report "Seafood Industry Value Chain Analysis Cod, haddock and nephrops".

This report looks at the value added to three species from the worth when landed, to the value added by processing of the fish, and to the final value of the fish when sold to consumers by retailers.

Due to a lack of data sources detailing the increase in value through the supply chain these three species, shown on the opposite page, are the best information available and give an approximate indication of the value added across all species.

This allows us to extrapolate the figures detailed earlier, showing the worth of marine resources within the UK EEZ. This shows Britain's fisheries resources are worth far more to the country when the value added through the supply chain is taken into account.

PERCENTAGE INCREASE IN UK SUPPLY CHAIN VALUE

Cod	Haddock	Nephrops	Average
x 323%	x 408%	x 460%	x 397%

THE VALUE OF BREXIT - TO BRITISH FISHING

Current	Gain	Post-Brexit	Catch to Retail
£796m	£786m	£1,582m	397%
All species	All species	All species	

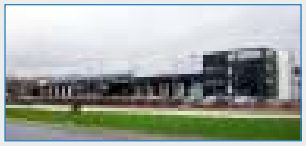
= £6,284 million

THE VALUE OF FISHING BREXIT TO THE UK ECONOMY

Taking the approximate cost of the projects below, this gives a comparison of the overall worth of UK fishing should we reclaim our fishing grounds in full.

= 6	Type 45 Destroyers	(£1,000m each)
= 18	Type 31 Frigates	(£350m each)
= 180	New Secondary schools	(£35m each)
= 8	New Hospitals	(£750m each)





These figures show the British fishing industry is worth considerably more to the country than those who discredit it acknowledge. Not only financially, but socially too, as the not-inconsequencial figures detailed here are of vital importance and huge benefit to coastal and rural communities.

This report has detailed the true worth of an industry, vital to our nation's food security that was sacrificed and betrayed as a pawn in the bigger EU project.

As fishing exemplifies the surrender of this nation to the EU, whether we reclaim the huge potential of our greatest natural resources, makes fishing the "acid test" of Brexit.

Fishing can be a beacon for the success of Brexit!

FISHING FOR LEAVE

SAVE BRITAIN'S FISH

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" Fishing is a critical resource for this nation's food security "