To DEFRA,

Many thanks for hosting the recent telecon regarding the dire situation facing many inshore fishermen who are reliant on Pollack.

There is no need for me to reiterate many of the comments and concerns raised by attendees but at the same time, some of those who were not able to attend are reliant on NUTFA to ensure that their voices are not lost.

My colleague Sarah Ready will provide you under separate cover with the financial importance of pollack to many inshore fishermen who have been in touch and her information will certainly serve to underpin the very dangerous situation for many faced with the loss of what is often their primary source of income.

It is worth noting at the outset that this coming calamity arrives when inshore fishermen have been under intense pressure from a general reduction in fishing opportunities [you will be aware that take up of the under ten pool for many species in many areas is running at only circa 50%+ in recent times], the enormous impact of the large scale fly seining effort on non quota species in the Channel, the harsh decision by the MCA to impose strict medical requirements together with their high handed approach to vessel surveys, high fuel prices and so on, seemingly ad nauseum.

The combined effects of all of the above has led many to consider giving up commercial fishing and this has in turn driven the market value of the secondhand boat market down to often very low levels.

It has been a tradition that retiring fishermen can sell their boat and licence to fund something of a pension pot but in today's reality, that cannot happen as demand, perhaps not surprisingly has stagnated. This in turn would also work against any initiative to introduce a decommissioning scheme for those affected. The phrase 'between a rock and a hard place' comes to mind.

The same saying could equally be applied to your conundrum.

For the sake of brevity I won't reflect on the abject lack of effective management over many years that has brought us to this catastrophe but it does consequently behave DEFRA and the current government to recognise the part that mismanagement has played. It would certainly appear that some form of interim financial support will be vital for those impacted and not least as it has clearly been caused by forces outside of their control.

Many of those reliant on pollack are some of the most sustainable fishermen in the country, using methods with little or no bycatch and no dead discards. It therefore seems somewhat perverse to decide to allocate what little quota the UK has on the basis of the FQA system, a system that your own previous Secretary of State commented to a parliamentary Committee thus: "As we depart from relative stability and have new fishing opportunities coming in, I do not think it makes any sense at all to compound the injustice of the FQA system."

Additionally, and as I mentioned during the telecon, the allocation of fishing opportunities post EU Exit is now governed by the contents of Section 25 of the Fisheries Act 2020. It is therefore incumbent upon you not to simply rely on a historic and outdated, albeit convenient system of allocation but to specifically include social, economic and environmental criteria within the allocation process. And to forestall a response that we have had previously from some of your colleagues, S25 does not relate only to any 'new fishing opportunities' coming in as that is not what the Act says. If it did mean that then it would have to say so and according to a leading KC who is an expert on fisheries matters, it very clearly doesn't.

Returning to the 'rock and a hard place' issue, another aspect not considered during the discussions was the very significant impact of the recreational sea angling sector in general and the charter boats in particular. ICES recognise that this sector does have a high level of pollack catches and that they focus very much on reefs and wrecks where pollack congregate although there is little or no hard data as to landings. They are of course not subject to quota restrictions and any thought of restricting effort will rely very much on effective enforcement and adequate reporting. It would of course be entirely inequitable if draconian cuts [and enforcement] were imposed upon the inshore commercial sector whilst rampant recreational effort was ignored.

In terms of impacts on fishermen, these should not be viewed as simply financial. The toll on mental health among the inshore fleet has been massive due to the elements mentioned at the outset of this note. Faced with potentially losing a very significant part of your income [it is worth reflecting on how you and your colleagues could fare if you had a 40% plus reduction in salary to contend with!] and perhaps even your house I suggest that aid is also provided for mental health support.

And in the event that this situation drives many fishermen to bankruptcy [I'm sure my colleague Sarah will inform you of the approach by some banks to the dire straits that many fishermen now find themselves in], the country in general and coastal communities in particular will lose so much knowledge, skills, traditions and culture that will never be replaced. It is also worth reminding you that for every job at sea, there are a significant number of shore jobs created to support them.

The cumulative impact of all these issues facing the inshore sector go far deeper than just the fishermen who are nevertheless at the heart of it. You will know that recent in depth studies have clearly illustrated that levels of deprivation in coastal communities are higher than in their inland equivalents. Plunging many fishermen into unemployment with all the downstream effects in this respect are undoubtedly huge in both social and economic terms.

As you so rightly recognised, there is no silver bullet to this but there are a number of individual elements that could certainly dilute the impact, at least in the short term. These should not be considered outside of a far more robust look at the underpinning science, such as it is, that has led to this situation as ICES admit that the stock is data deficient and that landings have declined for a number of reasons and not just because of a reduction in stocks per se.

Bearing in mind the 11th hour nature of this cataclysm the first consideration must be to underpin the survival of those affected by an aid package from January. We do of course recognise the challenge in this but these fishermen are facing ruin, through no fault of their own and without straying into wider political issues it does seem apparent that money is able to be found for other aspects within government and as fishermen in general were held up as the poster boys of Brexit, something that clearly benefited the current Administration, some payback would be entirely fair.

Access to other species such as Bluefin Tuna, Bass, Spurdog are all worth serious consideration together with the provision of financial support for changing fishing systems and interim aid to ensure the survival of this sector of the fleet from January.

We do not agree with your colleague who suggested that you might get legal challenges from those who had previously been refused a Bass entitlement as

all fishermen will no doubt recognise the urgent need generated by the pollack crisis for their colleagues affected.

A suggestion during the telecon regarding access to a scientific quota, for which there are precedents should also be considered and not least as it is clear that the stock lacks much hard data.

We were told that FaSS is due to come online early in the new year and we certainly hope that this can be not only expedited to provide support but also to be suitably amended to provide the focused assistance necessary.

I am sure that you and your colleagues comprehend the seriousness of the situation, your task, among many, is to persuade the government of the need for urgent and significant support.

It may be helpful to remind you of your own 2027 Fisheries Vision that the government endorsed that states:

"Access to fisheries continues to be available to small-scale fishing vessels, even if in some cases that is not the most economically efficient way of harvesting the resource. This is because the wider economic, social and environmental benefits of small-scale fishing can outweigh the comparative inefficiency in harvesting the resource and make a significant economic and social contribution to the lives of individuals and coastal communities, for example, by providing jobs, attracting tourists, providing high-quality fresh fish and maintaining the character and cultural identity of small ports throughout England."

We in NUTFA are of course here to help in any way that we can. It will be important, as I mentioned previously, for DEFRA to provide urgent advice and information to those affected so that they can, where possible make informed decisions and to ensure that baseless rumours do not acquire traction and only serve to further exacerbate the worries of fishermen.

Yours sincerely,

Jerry Percy

Director New Under Ten Fishermen's Association