



Annual Plan 2017-2018

Revised edition – 2nd November 2017

IFCA Vision

“Inshore Fisheries and Conservation Authorities will lead, champion and manage a sustainable marine environment and inshore fisheries, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry.”

Contents

1	Introduction	page 1
2	Areas of Importance	4
3	Action Plan	6
4	Budget	13

Appendices

High Level Objectives	14
Devon & Severn IFCA Metrics	19
SWOT Analysis	21
Risk Assessment Matrix	22
Staff Structure	30
Members	31
Glossary	32
Definitions	33

1. Introduction

This is the sixth annual plan for the Devon & Severn Inshore Fisheries and Conservation Authority (D&SIFCA). Following a very busy 2016/17 in which pressures on staff started to become a real concern, the Funding Authorities have been able to increase the IFCA budget by 3.42% for 2017/18. This welcome increase in the annual budget will allow for the employment of an additional enforcement officer to assist the current officers who have been under pressure due to the amount of prosecution files over the past twelve months. This continued support of all the local Authorities demonstrates their support for the IFCA and the work of the officers during very testing times for local council budgets.

Gloucestershire County Council, South Gloucestershire Council, Bristol City Council, North Somerset Council and Somerset County Council are still seeking a change in the boundaries of the D&SIFCA to remove them from the D&SIFCA. Any decision on changes in the boundaries of the D&SIFCA will inevitably be a strain on budget and staff time towards the end of the year.

The IFCA funding model was questioned by the Parliamentary Environment Audit Committee *Marine Protected Areas Revisited* inquiry hearings. The funding arrangements of the D&SIFCA were particularly questioned and the Committee's report to Parliament (published 25 April 2017) recommended that "*the Government should provide its assessment of any additional budget and resources that will be provided to the MMO and the IFCAs to enable them effectively to manage the third tranche of MCZs and designated MPAs*" [and] "*The Government should also ensure all IFCAs receive the full funding they are entitled to ...*"

Following the referendum result in June 2016 there is some uncertainty about the future direction of coastal fisheries management following the UK exit from the EU. The current plan is to make any changes required through the Great Reform Bill which will be the major new legislation required to enact EU legislation into UK law as well as any finer tuning of domestic legislation. The review of Defra's Marine Function may form part of this planning process and any decision for the future. The IFCAs and the Marine Management Organisation (MMO) continue to work closely together to identify where savings and increased harmonisation of services can be achieved through joint working. This work started in the Autumn of 2015 and is seen as an exemplar of how Defra and its Arm's Length Bodies (ALB) should work in the future.

At this time of uncertainty over the future of the IFCA model it is important that the Association of IFCAs is as strong as possible in its ability to represent all the IFCAs during negotiations with Defra and other Government bodies.

When Defra announced a change of approach to management of fishing activities within European Marine Sites (EMS) in February 2013 the IFCAs were set an extremely challenging target of delivering appropriate management of all fishing activities impacting EMS and Tranche 1 Marine Conservation Zones (MCZ) by the end of 2016. (The D&S IFCA Mobile Fishing Permit Byelaw was implemented to manage this red risk activity in January 2014). Large amounts of IFCA time and resource has been concentrated on the delivery of a very ambitious timetable to implement protection for all sites within the district. Defra have been able to support the IFCAs with some additional funding for research equipment and also for an additional staff member for a twelve month period to help complete the MPA work. The D&SIFCA completed all the work required for the sites by the end of December 2016; however there is now a delivery schedule for the Tranche 2 MCZ management which has to be completed by the end of 2017 and then a further delivery target for the Tranche 3 sites which should be notified to the IFCA by the end of 2017. The management structure is now in place through the permitting byelaws which allows for adaptive management but additional research will be required to ensure that any management measures are able to protect the sites designated features.

Protection of the bass stocks is still a high priority at a European, national and local level with management changes to enable an 80% reduction in fishing mortality, which is required to safeguard the stocks in the long-term. Now in the third year of increased management of the stocks there will be increased requirement from the IFCAs to work with the MMO to deliver appropriate enforcement of the new EU and national control measures. The IFCAs are involved in the national review of the Bass Nursery Areas (BNA) which will help to deliver local benefits to bass stocks and the local fishery. The D&SIFCA has also had an active role in developing relationships with the recreational sea angling Sector (RSA) through development of angling zones, codes of conduct and bait surveys. This could develop further to possibly reduce targeting of bass in areas not covered by current legislation.

The introduction of the new permitting byelaws has allowed the D&SIFCA to use a flexible and adaptive management style within the district and this approach is now being considered by other IFCAs. The first permitting byelaw introduced by D&SIFCA

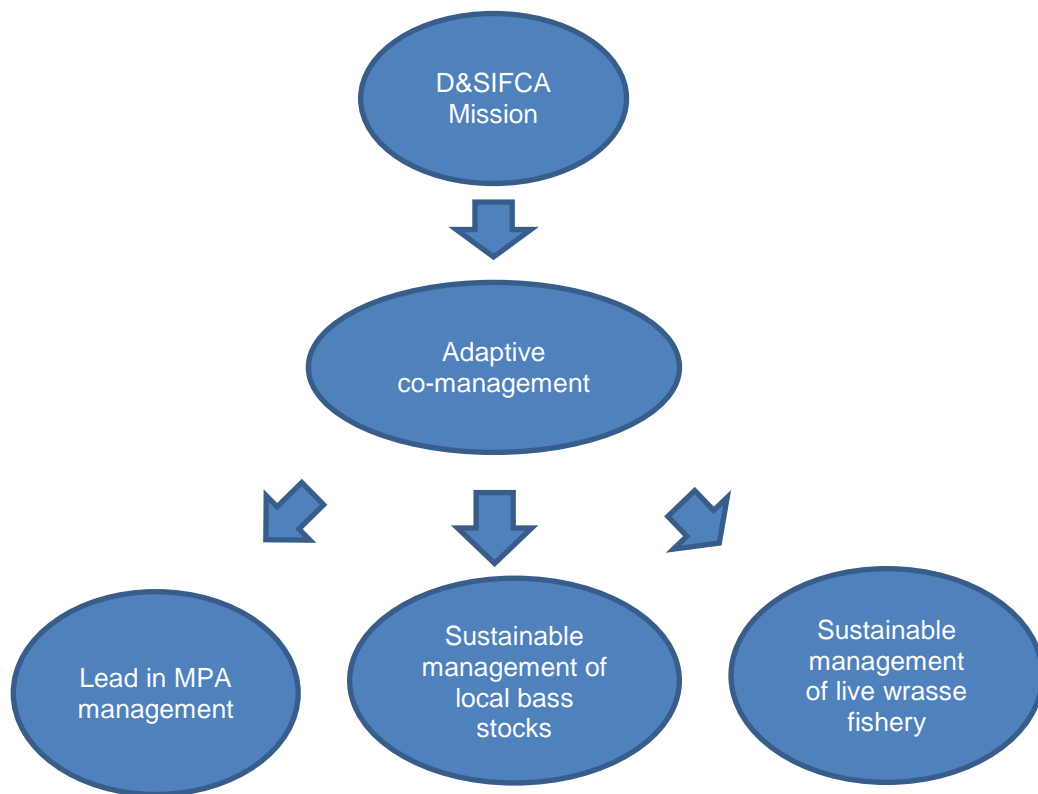
was to manage mobile fishing operations such as trawling and scallop dredging. Introduced in 2014, it will be the first of several D&SIFCA permitting byelaws to be subject to a complete review. Guidance from the Minister is that all byelaws should be reviewed every five years. Other permitting byelaws introduced since 2014 include potting and also diving. All permit based byelaws include the provision that the flexible permit conditions are reviewed at least every three years and can be triggered at sooner intervals as specified within the review process which is embedded in the main byelaws. Creation of a new netting byelaw is on-going and possibly two other permitting byelaws are required to complete the full byelaw suite¹. Byelaw development and review work will take up a great deal of officer time during 2017.

There will be a requirement to review and assess the responsibilities of officers to both undertake and ensure that this work can be carried out with the minimum disruption to other important work areas and therefore the structuring of staff roles will be a consideration throughout the 2017 – 2018. New and innovative technology will increasingly be utilised to assist in the protection and enforcement of the district's fisheries and MPA network.

This year will again be a challenging and busy year for the officers and members of the Authority with expectations to be met from national and local organisations, to deliver the protection required for MPAs, to continue to enforce the current byelaws and to continue with the byelaw review process to ensure that all D&SIFCA byelaws provide flexible and adaptive management for the entire district.

¹ A minimum number of stand-alone byelaws may still be required

2. Areas of Importance



Action	Delivery Targets	Partners
1. MPA Management	i) Complete and introduce management measures for all EMS Red and Amber fishing gear interactions by June 2017 ; and for all T1 MCZs by October 2017	Defra Natural England MMO Welsh Government Adjacent IFCAs Fishing Industry NGO Pioneer Project
	ii) Introduce and fit iVMS (144 Units) to all >7m Mobile Gear Permit holding vessels by December 2017	
	iii) Evaluate and publish a report on testing potential role of UAV systems to improve protection of MPAs by January 2018	
	iv) Review MPA management measures through the Mobile Gear Permit Byelaw conditions, thereby delivering flexible adaptive management by December 2017	
2. Management of local Bass	i) Enforcement of new Bass Legislation through regular joint enforcement actions. Monthly Planning Meetings with all relevant agencies.	Defra MMO Welsh Government Adjacent IFCAs Fishing Industry Recreational Sea Anglers Academic Researchers CEFAS
	ii) Introduction of Netting Permit Byelaw by October 2017	
	iii) Set up an IFCA Bass Management Group to ensure harmonisation of IFCA response to the local bass fishery concerns by July 2017	
	iv) Harmonise management measures adopted with adjacent IFCAs and Welsh Government. To include cross warranting, data sharing & joint enforcement meetings by February 2018	
	v) Support completion of 3 year PhD Research Project into district bass populations by December 2019	
3. Management of live Wrasse Fishery	i) Undertake Consultation with Permit Holders by May 2017	Defra MMO Natural England Fish Health Inspectorate IFCA TAG Adjacent IFCAs Fishing Industry Salmon Industry NGO Academic Researchers CEFAS
	ii) Evaluate Management Options by June 2017	
	iii) Undertake Stocks Assessment. Working with landing records and IFCO observers by February 2018	
	iv) Support Additional National Management through sharing of data and management experience.	
	v) Harmonise Management with adjacent IFCAs by April 2018	
	vi) Explore possibility of externally funded research projects. Public and Private sources by October 2017	

3. Action Plan

Outline of Challenges for 2017 – 2018

This annual plan lays out the main activities and actions to be undertaken in 2017-18.

There are three targeted areas where the D&SIFCA will be able to lead and develop best management practice to provide a benefit to those who live and work within the IFCA district. These will be to lead on the protection of the MPA network within the district and protection of bass and “live” wrasse stocks within the district. These areas are linked to the mission statement for the D&SIFCA and help to deliver adaptive co-management of the sea fish resources for the district. These work streams have been developed through adherence to Ministerial guidance and stakeholder feedback.

Lead on MPA Management

The first tranche of MCZs were designated by the Minister on 21st November 2013. The MCZ were enacted through the Marine and Coastal Access Act 2009 (MaCAA). Consultation is about to start on tranche three sites and this will potentially provide D&SIFCA with an additional eleven sites which will require management within the next four years. Management measures for the tranche two sites are expected to be in place by the end of 2018. The IFCAs were considered to be an appropriate authority to manage the new MCZ network and were given specific powers and requirements to undertake the role. With the designation of any sites in the D&SIFCA district, work is therefore required to produce management schemes to further the conservation objectives of the sites. Several of the sites are co-located within current EMS but will still require management measures in tandem with the EMS to protect and in some cases aid the recovery of the named feature.

Following the revised approach by Defra in October 2012 there was an initial requirement for the management of the red risk fisheries within EMS by January 2014, and this was delivered by D&SIFCA. This years' work will revolve around projects providing management measures required to protect the EMS features from those fisheries which were given extended periods for management beyond the December 2016 deadline. following agreement between the national bodies involved in the work, this was mainly fisheries within estuaries which were previously covered by Natural England (NE) powers within SSSI. This will involve some additional work

in areas already under management and a focus on the estuary sites not already under increased protection.

The D&SIFCA has nine EMS, four of which have shared boundaries with another IFCA or in the case of the Severn EMS, a boundary with the Welsh Government. One site has two IFCAs and the MMO as the managers for the fishing activity. The drawing up of management measures to protect the sites from fishing activities will require additional work this year to produce coherent protection for the sites.

The byelaw review process, already underway, will help the IFCA to address some of MPA issues with improved capability through a more flexible approach to fisheries management. The D&SIFCA have pioneered this approach using the new byelaw powers afforded by MACAA. The new Permitting Byelaws for fishery activities within the district will help to provide a flexible and adaptive approach. All byelaws that are proposed by the IFCA will require an impact assessment (IA). The impact assessments are a requirement for all new legislation. The evidence base and information collected during consultation phases will give a level of detail required for the drafting of appropriate management measures prior to submission and potential confirmation by the Secretary of State. These permitting byelaws will provide the main framework for the IFCA's management and protection of MPAs as well as providing flexible management for the entire district.

The second area of work required for the management of MPAs is accurate mapping of the MPA features that require protection. Some mapping has been undertaken by Natural England (NE) and this will need to be built upon in order for the IFCA permitting byelaw approach to work correctly. The provision of buffer zones in order to give full protection to the features will also be required and this can only be better understood if the initial mapping was accurate and thorough. The second part of the research work will require data to be collected on the interaction of fishing activities already under management to assess the success that the new byelaws have had on the protection of the sites.

One of the difficulties in the IFCA planning process (and budgeting in the short to medium term) is predicting the amount of work that D&SIFCA will face in delivering and implementing its duties in regard to the management of MPA (and other aspects of IFCA work). It is hard to predict exactly the levels of management and enforcement that will be needed for the protection of MPA within D&SIFCA district to

be successful. It is envisaged that over time these planning difficulties will become clearer and D&SIFCA will be able to refine existing management process to react to changing circumstances. Once the amount of time and resources D&SIFCA will apportion to key tasks has been established, long term planning of D&SIFCA resources should become more straightforward.

Sustainable Management of Local Bass Stocks

European sea bass (*Dicentrarchus labrax*) is an important fish species in Northwest Europe to both commercial fishermen and recreational anglers. Its biology, in particular its slow growth rate, temperature dependent recruitment and schooling behaviour at inshore and offshore sites, makes it a particularly vulnerable species to overfishing. Coupled with greatly increased market demand, the natural and anthropogenic pressures on European sea bass have led to a major decline in abundance, leaving stocks at a potentially critical level.

Sea bass is an extremely important target species in the D&S IFCA district. The species is taken by both fixed and drift net, by longline and rod and line fishing. Netting for sea bass takes place in several Devon estuaries outside the BNA closure dates. Whilst the majority of netting outside of estuaries occurs in the summer, local observations suggest that adult bass don't seem to be moving offshore so much and the period has extended from late spring through to Christmas time. Rod and line fishing for sea bass from kayaks seems to have increased significantly and not being a powered vessel means fish can be sold without a fishing vessel licence.

Although it is extremely difficult to quantify the importance of one species to recreational angling as a whole, bass are of great importance to recreational anglers throughout the south and south west of England. It is targeted from both the shore and private boats and is also an important species for the charter boats operating on the south and north coasts of the district. In 2012 D&S IFCA identified 73 angling charter boats operating out of ports on the south coast of Devon and 38 boats operating out of North Devon and the Severn Estuary.

Bass PhD - Ecology and distribution of European Sea Bass in inshore and coastal waters in South West England

Following a review of the causes of recent declines in European sea bass (*Dicentrarchus labrax*) and associated changes in management at a European level, D&S IFCA stated that it would review possible additional work that the IFCA could undertake which would aid bass conservation efforts (Ross, 2015). A workplan was developed, part of which was to be undertaken by a PhD student funded jointly by D&S IFCA and Plymouth University.

D&S IFCA are working closely with Southern and Cornwall IFCAs to align management as closely as possible.

Sustainable Management of Live Wrasse Fishery

The Wrasse Fishery

Wrasse are used as cleaner fish in Scottish salmon farms to control sea lice populations. To meet demand, wild wrasse is being sourced from southwest England. In the D&S IFCA district vessels have been operating out of Plymouth since 2015 and a fishery is expected to start in Torbay this year (2017). The fishery uses specially designed pots and targets five species of wrasse. Although the fishery emerged in the 1990's in Norway, Scotland, Ireland and England, there is little information on the impact of these fisheries. Where data exists, local depletions and changes to size structures and sex ratios have been noted.

Wrasse Ecology

All five species of wrasse live inshore, on rocky reefs and seagrass beds. However, each of the species has different life-history traits such as habitat requirements, size at sexual maturity, spawning season and depth range. Wrasse display complex reproductive biology and are highly territorial, occupying small spatial areas. A detailed report has been produced by officers with information on wrasse ecology, biology and fisheries interaction. This document, which is available on the D&SIFCA Website, provides information on the wrasse fisheries in Ireland and Norway; some information regarding the emerging fishery in the D&S IFCA district; and implications of the fishery on habitats and the ecosystems.

Marine Protected Areas

The fishery in the D&S IFCA district occurs almost entirely within MPAs. The fishery has the potential to alter the species population structure and wrasse community composition through preferential targeting of different sizes/species and differences in catchability. Indirect effects could include changes to social structures, sex ratios, egg survival and the genetic stock structure. Additionally, the impact of removing wrasse from rocky reefs could lead to wider ecological changes on the effected reefs, known as trophic cascades. D&S IFCA will therefore need to undertake detailed MPA assessments.

Research Requirements

Due to complex spatial interactions between fishing effort and stock abundance and the need to undertake detailed MPA assessments, D&S IFCA officers believe that the implementation of a fully documented fishery is necessary. This should include compulsory logbooks for all fishermen and additional on-board observer data collection. Additional work looking at catch efficiency of pots will help with interpretation of the effort data. In the medium to long-term dedicated survey options should be considered. A partnership including other IFCAs, industry, Cefas and universities may be required in the long term to determine the correct unit of management and assess direct and indirect impacts of the fishery.

D&S IFCA Potential Wrasse Management

The wrasse fishery can be managed through the D&S IFCA Potting Permit Byelaw, via the flexible permit conditions.

Management of this emerging fishery is seen as important as there a number of risks that have been identified from the information gathered on the species ecology, biology, the expected fishing effort and data collection requirements. The risks are:

- Whilst information on the level of effort has been provided by the salmon farms directly or by their agents, the IFCA is aware that fishermen within the district can act independently to engage with the salmon farm companies to offer a supply of wrasse to them. During phone conversations with some of the farms that do not currently take wrasse from the Southwest, the IFCA officer was asked if she was able to supply wrasse to them or knew of fishermen that could. This highlights that there is a level of interest that has not yet been acted upon. Agent Y for Salmon Farm 1 operates out of Weymouth and has advertised through the website 'Find a Fishing Boat' for

more boats to supply wrasse to them. Therefore, the IFCA does not know if the effort in its district will increase further than currently predicted in 2017.

- There is a huge amount of uncertainty in the fishery, in terms of the impact of the removal of wrasse from the habitats and ecosystems in which they live. The uncertainty includes how the removal of mature wrasse will effect their population structure, reduction in their cleaning capability leading to disease prevalence/ infestation on other fish species, kelp epifauna ecosystem impacts and populations of those species wrasse currently predate on, such as amphipods and isopods – ‘trophic cascade’ impacts.
- For Ballan and cuckoo wrasse the impact on the populations of the removal of the dominant males is largely unknown.
- No stock assessment has been undertaken on this species so baseline data are not available.
- The wrasse fishery in the UK is largely undocumented although in Scotland it has been taking place for many years. This lack of data leads to the uncertainty on the impact of the fishery.
- Anecdotal evidence from fishermen targeting wrasse in Scotland suggests there is a decline in the wrasse numbers being landed. Work done in Ireland suggests that the fishery has declined in areas after two years of the fishery taking place.
- The fishery period partly coincides with the spawning period for all species

The benefits of the emerging fishery are:

- It allows small inshore vessels to diversify for some of the year.
- It potentially can remove or lessen the pressure on other fisheries and species
- This is an opportunity of the IFCA to help the development of a new fishery whilst introducing management that ensures its sustainability and increases the IFCA’s knowledge of any impact on the inshore ecosystems where the activity takes place.

Management options will be consulted on with D&SIFCA permit holders and all other interested parties before management measures are brought into place through the permitting byelaw.

General Work Areas

Risk based enforcement frameworks are key to the new work of the IFCA. Implementing this framework is a key component of meeting many of the high level objectives set for the IFCA. A key part of developing and delivering this framework will be compiling a risk register for the district and then using this table to evaluate and rank risk. These tools can then be used to inform enforcement policy and to allocate enforcement resources.

To continue the IFCAs work of building strong relationships with partner organisations and stakeholders by developing new and more efficient ways of working. Through the development of memoranda of understanding (MOUs) with key partner organisations, agreement has been reached regarding shared use of resources and data, wherever possible, including sharing training facilities.

Officers will continue to work as part of the national IFCA organisations such as the Association of IFCAs, Chief Officers' Group, National Inshore Marine Enforcement Group, Technical Advisory Group and the National Training Group. These groups help the IFCAs to deliver a more consistent approach to their shared responsibilities as well as allowing officers to talk to their counterparts in other IFCAs.

A joint national intelligence programme is being rolled out between the MMO and the IFCAs during the next twelve months to enable better and safer sharing of intelligence between not only the two fisheries organisations but also other marine based partner organisations. This will require greater participation in national and regional meetings and training events for the relevant officers.

It is important for the IFCA to continually challenge traditional methods of management, enforcement and research. The use of new technology should be evaluated to ensure that the work of the IFCA is being undertaken in the most efficient and cost effective methods available to it. This work should where possible be undertaken in partnership with partner organisations where shared values can be improved on through a collaborative approach.

The enforcement plan and research plan for 2017/18 will be published in separate documents but should be linked to the Annual Plan for context. The Risk Assessment carried out in the Annual Plan covers both these areas of work.

4. Budget

	2016/17 Base Budget	Base Budget Adjustments	Inflation	2017/18 Budget
	£	£	£	£
Employees	506,500	12,500	5,800	524,800
Premises	33,500	2,900	0	36,400
Transport	29,600	3,500	0	33,100
Supplies & Services	89,600	2,300	0	91,900
Boat Costs	42,700	(5,200)	0	37,500
Environmental Research	19,900	(6,400)	0	13,500
Support	23,800	5,600	0	29,400
Fees & Charges	(11,000)	(16,700)	0	(27,700)
	734,600	(1,500)	5,800	738,900
DEFRA MPA Grant	(20,000)	20,000	0	0
Transfer from General Fund	(21,400)	(600)	0	(22,000)
Total	693,200	17,900	5,800	716,900

	2016/17 Indicative Levy	Increase in Levy	2017/18 Indicative Levy	2017/18 New Burdens Funding	Variance
	£	£	£	£	£
Bristol City Council	39,166	1,339	40,505	50,851	(10,346)
Gloucestershire County Council	100,306	3,429	103,735	122,428	(18,693)
North Somerset Council	32,095	1,097	33,192	42,574	(9,382)
Somerset County Council	110,149	3,766	113,915	133,952	(20,037)
South Gloucestershire Council	28,283	967	29,250	38,110	(8,860)
Total New Authorities	309,999	10,598	320,597	387,915	(67,318)
Devon County Council	326,428	11,161	337,589	21,382	316,207
Plymouth City Council	32,580	1,114	33,694	0	33,694
Torbay Council	24,193	827	25,020	0	25,020
Total All Authorities	693,200	23,700	716,900	409,297	374,921

Appendices

<p>Success Criterion 1: IFCAs are recognised and heard, whilst working in partnership and engaging with stakeholders</p>		
<p>Definition: IFCAs will be visible, respected and trusted regulator within coastal communities and will maintain and deliver a strategy to communicate their vision and duties effectively. IFCAs will engage with policy makers, industry, Non-Governmental Organisations (NGOs), recreational and commercial users; and other regulators. They will work jointly and collaboratively with partner organisations across boundaries; will participate and contribute to the development and implementation of regional and national marine policy, including the marine planning regime; will take long-term strategic decisions and manage risks effectively. IFCAs may maintain a national body to co-ordinate the activities of authorities that are party to arrangements.</p>		
<p>Outcomes</p> <ul style="list-style-type: none"> The IFCA will maintain and implement an effective communication strategy. The IFCA will maintain its website, ensuring public access to current fisheries and conservation information for the District, including management requirements and byelaws. Non-reserved IFCA Committee papers will be published. The IFCA will contribute to co-ordinated activity at a national level The IFCA and its principal partners will have a clear understanding of roles and responsibilities. Memoranda of Understanding with MMO, Natural England, Environment Agency and Cefas will be maintained. Opportunities for greater efficiencies, effective joint working and collaboration will be explored and implemented when feasible. 	<p>Indicators</p> <ul style="list-style-type: none"> SC1A: The IFCA will maintain a database of stakeholder contacts that will have been reviewed and updated by 31 March each year SC1B: The IFCA will have completed a review of its communication strategy and implementation plan by 31 March each year. SC1C: The IFCA will have reviewed its website by the last working day of each month. SC1D: The IFCA will have reviewed its website and ensured it meets the objectives of its communication strategy, by 31 March each year. SC1E: The IFCA will have reviewed all of its Memoranda of Understanding by 31 March each year. There will be a clear plan in place to update MoUs where necessary, to an agreed timescale. SC1F: By 31 March each year, the IFCA will have participated appropriately, proportionately and at the right level of delegation, in regional and national fisheries and conservation activity identified in the annual plan. 	<p>Q4</p> <p>Q4</p> <p>All</p> <p>Q4</p> <p>Q4</p> <p>All</p>

Success Criterion 2:

IFCAs implement a fair, effective and proportionate enforcement regime

Definition:

The IFCA enforcement regime is risk-based, makes appropriate use of intelligence, meets legislative standards and complies with the Regulators Code. It should make effective use of the resources available to regulators; complement and align, if possible, with the regimes in adjacent IFC Districts and management by other organisations including the MMO and Environment Agency. Consistency and fairness is important. Regulatory compliance is promoted. Enforcement action is carried out by trained, professional officers working to clear standards of conduct.

Outcomes

- The IFCA will publish its enforcement risk register and strategy, clearly setting out its approach to achieving regulatory compliance and potential sanctions that may be applied for infringements and/or offences.
- The IFCA will have developed consistency in regulations (byelaws) with other organisations
- The IFCA will manage operational activity (e.g. through a Tasking & Co-ordination Group) and capture, record, evaluate and disseminate intelligence that is compatible with partner organisations. It is engaged in joint working with partner organisations.
- Warranted Inshore Fisheries and Conservation Officers (IFCOs) will be trained and accredited to nationally agreed standards. They will maintain professionalism and make appropriate interventions to deliver efficient, effective enforcement activity

Indicators

- **SC2A:** The IFCA will ensure its enforcement risk register and strategy are published and available on its website from 1 April each year
- **SC2B:** The IFCA will demonstrate in its Annual Report how it has worked with other regulators to achieve consistent quality, application and enforcement of management measures
- **SC2C:** The IFCA will compile records of enforcement activity in a standard format; provide them to the National Inshore Marine Enforcement Group (NIMEG) and publish them on its website.
- **SC2D:** The IFCA will adopt the national Code of Conduct for IFCOs, which will be reviewed annually and published on its website by 1 April.
- **SC2E:** The Code of Conduct for IFCOs is reflected in work objectives and annual appraisals for all Warranted Officers.
- **SC2F:** Warranted Officers attain accreditation. All undertake Continuing Professional Development

Q4**All****All****Q1****Q1
&3****All**

<p>Success Criterion 3: IFCAs use evidence based and appropriate measures to manage the sustainable exploitation of sea fisheries resources and deliver marine environmental protection within their districts</p>		
<p>Definition: The IFCAs were created as statutory inshore regulators by the Marine and Coastal Access Act 2009. They are relevant authorities for implementing international environmental commitments including the Birds, Habitats, Water and Marine Strategy Framework Directives and make an important contribution to securing a network of well managed marine protected areas, including European Marine Sites and Marine Conservation Zones. Fisheries Management Plans identify local management measures which should be based on evidence; be timely; subject to appropriate consultation and in step with national initiatives and priorities. An IFCA should balance the social and economic benefits of exploiting sea fisheries resources with the need to protect the environment. It should make a contribution to sustainable development.</p>		
<p>Outcomes</p> <ul style="list-style-type: none"> • The IFCA will identify issues likely to affect sustainable management of the marine environment in the IFC District; undertake risk assessment and gap analysis; review appropriateness of existing measures; evaluate management options and develop and implement proportionate marine management solutions • The IFCA will support implementation of a well-managed network of marine protected areas by: developing a range of criteria-based management options; implementing management measures to ensure that inshore fisheries activities comply with the Marine and Coastal Access Act 2009 and the revised approach to managing commercial fisheries in European Marine Sites; and that local management contributes to delivery of targets for the Marine Strategy Framework Directive, Water Framework Directive and Marine Plans. • The IFCA will develop Fisheries Management Plans for priority species where appropriate. Shared objectives will be developed with identified partners; actions identified and best practice reflected so that management makes a contribution to sustainable development. 	<p>Indicators</p> <ul style="list-style-type: none"> • SC3A: The IFCA will record site-specific management considerations for Marine Protected Areas and report progress to the Authority • SC3B: The IFCA will publish data analysis and evidence supporting new management measures, on its website • SC3C: Management information (e.g. sampling and/or survey results) will be collected periodically after new management measures have been implemented, to demonstrate the extent of effectiveness of the intervention • SC3D: The IFCA will have developed a range of criteria-based management options that are explained to stakeholders through the IFCA website, and reviewed by 31 March each year • SC3E: New IFCA management measures selected for development and implementation are delivered within agreed timescales • SC3F: The IFCA will include shared agreed objectives and actions from Fisheries Management Plans in its own Annual Plan, which will be published by 31 March each year. • SC3G: Progress made in relevant Fisheries Management Plan areas, including Maximum Sustainable Yield commitments, will be noted in the IFCA's Annual Report. 	<p>All</p> <p>All</p> <p>All</p> <p>All</p> <p>Q3</p>

Success Criterion 4:

IFCAs have appropriate governance in place and staff are trained and professional

Definition:

IFCAs are statutory authorities and sit within the local government family. Authority members may be either general members or local councillors. They comply with Codes of Conduct and the Standing Orders that apply to meetings of local government committees. General members are appointed on merit, through open competition and for a term. They are subject to an annual performance appraisal.

An IFCA is funded by levy, charged to its member councils. Funding originates in local taxation. An IFCA is accountable for its use of public resources and should ensure that a proper auditing regime provides confidence in its commitment and spend of public money. It should make effective use of its resources, including staff and assets. An IFCA has a statutory obligation to prepare and publish Annual Plans and Annual Reports.

Outcomes

- The IFCA will demonstrate its long-term strategic approach to sustainable marine management by having appropriate plan-making, review, update and amendment procedures in place. The IFCA will record its performance against corporate outcomes and indicators as soon as practically possible following the end of the financial year.
- Staff performance management systems will be in place that link to the IFCA success criteria. There will be an induction procedure for new joiners. Staff training and development needs will be identified. Performance will be managed and, where necessary, improvement procedures will be followed.
- The IFCA Committee will be supported by an organised, efficient and effective secretariat. New members will receive an induction pack and briefing from the Authority. There will be a rolling twelve month schedule of quarterly Authority meetings. Notices of meetings and documentation will be made available in line with Standing Orders.
- IFCA Committee meetings will be held in public unless material is either confidential, or exempt within the meaning of the Local Government Act 1972

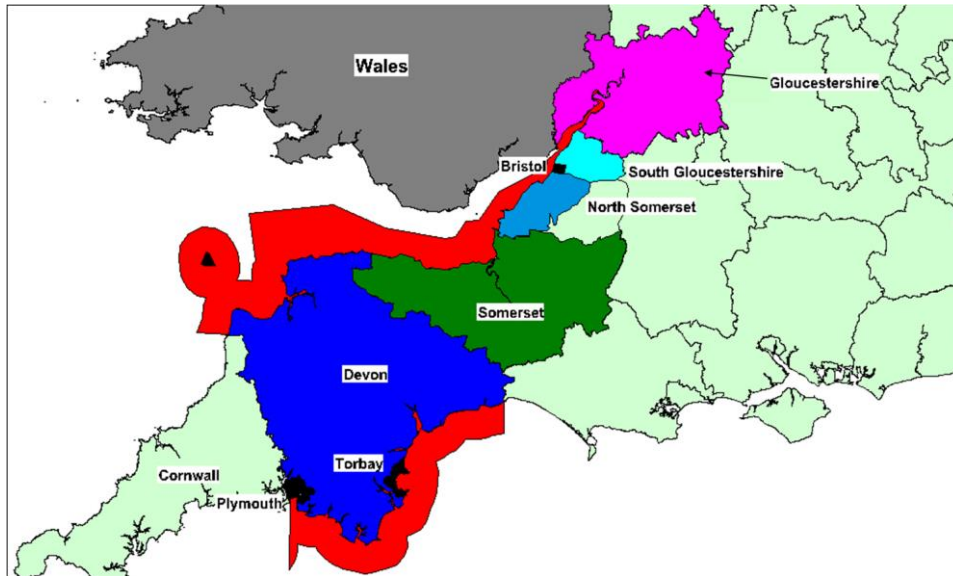
Indicators

- **SC4A:** The IFCA will publish a Plan on its website by 31 March, setting out the main objectives and priorities for the next financial year. A copy will be sent to the Secretary of State.
- **SC4B:** After the end of each financial year, the IFCA will publish a Report on its website describing its activities, performance and a summary of audited financial information in that year, by 30 November. A copy will be sent to the Secretary of State.
- **SC4C:** IFCA staff will have annual performance management plans in place. Annual appraisals for all staff will have been completed by 31 May each year.
- **SC4D:** An efficient secretariat of IFCA staff support IFCA Authority meetings which are held quarterly and are quorate. Meeting documentation will meet Standing Orders.
- **SC4E:** The IFCA will have demonstrated, in its Annual Report, how marine, land and water management mechanisms in the Inshore Fisheries & Conservation District have worked responsively and effectively together.

Q1**Q3****Q1
&3****All**

<p>Success Criterion 5: IFCAs make the best use of evidence to deliver their objectives</p>		
<p>Definition: IFCAs are statutory regulators for their Inshore Fisheries and Conservation District. Decision-making should be based on evidence. All IFCAs are supported by officers who pool their expertise and share best practice as a Technical Advisory Group (TAG). A programme of research activity and monitoring is planned, developed and updated in consultation with partners. The programme informs management decisions and supports justification for additional research and evidence gathering.</p>		
<p>Outcomes</p> <ul style="list-style-type: none"> • A strategic research plan that contributes to greater understanding of the marine environment and delivery of cost-effective management of sea fisheries resources • Standard Operating Procedures describe how data is captured and shared with principal partners • A list of research databases held by the IFCA and the frequency of their review • Non-confidential meta-data collected through the IFCA research programme should be recorded in a database available to the marine research community 	<p>Indicators</p> <p>SC5A: The IFCA will demonstrate progress that has made towards identifying its evidence needs by publishing a research plan each year</p> <p>SC5B: The IFCA will publish a research report annually that demonstrates how evidence has supported decision making</p> <p>SC5C: The IFCA's contribution to TAG and progress that has made towards a national evidence needs programme will be recorded in the IFCA's Annual Report</p>	<p>Q1</p> <p>Q1</p> <p>All</p>

Devon & Severn IFCA Metrics



Size of the District

4,522 km² of sea

1,314 km² of coastline

9,141 km² of land

The largest IFCA district, with the added complication of two coasts.

In addition, D&SIFCA has cross-boundary co-operation and joint management responsibilities with 2 adjacent IFCAs (Cornwall and Southern), Welsh Government and the MMO.

Lundy Island is 12 miles off the coast and was the first MCZ in the country and has a No Take Zone.

Costs

The annual budget divided by area of sea is £158.53/km² for 2017

Staffing

Chief Officer

5 Enforcement Officers

4 Environment Officers

1 Part-time Office Manager

1 PhD Student

One FTE for every 452 km² of coastal waters to protect and manage

Fishing Activity within the District

In 2016 the D&SIFCA issued 657 permits under its permitting byelaw scheme. Each permit lasts for a period of 24 months

There are three permits at present with a netting permit expected during 2017.

Towed Gear Permits	156 Commercial	57 Under 10m vessels
Potting Permits	172 Commercial	165 Recreational
Diving Permits	6 Commercial	158 Recreational

24 ports and harbours ranging in size from the River Parrott to Brixham Harbour

Enforcement Activity

In 2016 there were 61 cases where evidence was found by IFCA enforcement officers or other agencies.

20 Official Warnings were issued

10 Financial Administrative Penalties were given

9 Court cases were successfully prosecuted. None were not proven guilty verdicts.

22 cases were given warning letters or re-briefs on the relevant legislation.

8 cases involved joint operations with the adjacent IFCA's, MMO, MCA or local police

Marine Protected Areas

1,110 km² of MPA

9 European Marine Sites

4 Tranche One MCZ

2 Tranche Two MCZ

10 Tranche Three MCZ (under consultation)

24.5% of District within an MPA

SWOT Analysis

The following SWOT analysis was initially developed by the IFCA. It outlines both the challenges and opportunities facing the D&SIFCA in delivering its annual plan. The analysis will be useful when reflecting on the success of the annual plan in the annual monitoring report.

STRENGTHS:	WEAKNESSES:
<ol style="list-style-type: none"> 1. Locally delivered fisheries & environmental management 2. Partnership working with Defra organisations 3. IFCA Authority oversight of the process 4. Sub Committee delivery of key objectives 5. Experienced & Trained staff 6. Flexible and adaptive approach to fisheries and conservation 7. Ministerial Support 8. Modernised powers 9. Close working with NGO sector 10. Strong Research Ability 11. Organisational Integrity 12. Skills of the Authority members 13. Delivering Projects on time 	<ol style="list-style-type: none"> 1. Resources being directed by national issues. 2. Size of the area in relation to resources 3. Lack of understanding of new duties amongst IFC Authority 4. Managing a large and complex Authority structure 5. Small team under pressure to deliver large areas of work. 6. Not in full control of district fishery legislation 7. Full integration difficult to achieved 8. Scope for potential overlap with other relevant authorities 9. Lack of effective national voice 10. Lack of budget to carry out work required. 11. Limitations in current IFCA Assets 12. Communicating the Aims & Objectives of the IFCA
OPPORTUNITIES:	THREATS:
<ol style="list-style-type: none"> 1. Partnership working with Defra funded organisations 2. MOU's and co-delivery 3. Partnership with universities 4. Community level engagement 5. Delivering sustainable development 6. Develop better marine protection 7. Social, Economic and environmental gains 8. Underpinning IFCA planning through sound, enhanced scientific information for the whole IFCA area 9. Maximise opportunities to deliver statutory duties 10. Develop improved inshore management through byelaw review. 11. Make longterm improvements to the inshore environment. 12. Develop the model of transition to allow for new and innovative funding to be accessed to improve delivery by the organisation. 13. Use of new innovative technology 	<ol style="list-style-type: none"> 1. Removal of New Burdens Funding 2. Redrawing of the IFCA Boundaries in the Severn Area 3. Lack of support from Severn authorities 4. Limitations of funding available 5. IFCA perceived as low priority by councils 6. Failure to comply with legislation 7. Failure to meet DEFRA MCZ management objectives 8. Failure of support from local people 9. Tight timescales and DEFRA's expectations 10. Unrealistic expectations from third parties 11. Fear from fishermen may limit engagement 12. Poor perception as a result of unpopular decisions 13. Lack of understanding 14. Weakness in current staff structure 15. Skills gaps within current staff 16. Poor communications with third parties

Risk Assessment Matrix

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Degradation of Marine Protected Areas due to fishing activity	4	2	3	4	<ul style="list-style-type: none"> • Effective enforcement • Undertake an adaptive co-management approach to fishing • Work closely with Management groups for MPAs • Undertake Strategic Environmental Assessment for district. • Introduction of proactive public education and outreach programme • Continue present data gathering • Undertake audit of environmental features likely to be affected by fishing activity • Use of new technology to monitor fishing activity within the district. 	2
	Loss of important habitat and species	Environmental welfare a statutory material consideration in IFCA management decision making process	<p>Fisheries responsible closed.</p> <p>Increased pressure from conservation groups to stop fishing activities</p> <p>Possible Judicial Review & possible breach of UK statutory duties & possible EU Infraction with financial liability for local taxpayers</p>	IFCA not meeting statutory duties under EU & UK conservation legislation.		Fishing activity can damage protected habitat and species.

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Enforcement activities conducted in an unprofessional and uncoordinated manner.	4	2	3	4	<ul style="list-style-type: none"> • Regular staff meetings • Regular staff training • Staff appraisals • All IFCOs receive regular PACE training through a nationally accredited scheme. • All seconded officers receive regular training. • Code of Conduct for inspections at sea and ashore developed • Standard boarding forms developed • Standard legislation notes provided to all IFCOs • Legislation notes regularly updated • IFCO trained alongside MMO boarding officers • Adequate budget identified for training of IFCOs • Compliance & Enforcement Strategy published on website • Joint working with other enforcement agencies • 	2
	<p>Inconsistent approach to fisheries enforcement.</p> <p>Enforcement problems and non compliance with legislation.</p> <p>Poor morale amongst IFCA staff.</p>	<p>Misinformation may be given by officers or information may be misinterpreted by fishermen.</p>	<p>Wrong interpretation of legislation may lead to loss of earnings of fishermen.</p> <p>Possible financial liability incurred for local taxpayers</p> <p>Uncoordinated enforcement may lead to over regulation by enforcement bodies.</p> <p>Failure of court cases with a loss of 'cost recovery'</p>	<p>Failure to carry enforcement efficiently and effectively reflects poorly on the IFCA</p>		<p>Considerable resources are directed towards officer training but frequent changes to legislation and human error can lead to mistakes being made.</p>

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Failure to maintain survey/ sampling programme.	4	2	4	4	<ul style="list-style-type: none"> • Work plans developed for research staff • Research staff well qualified and experienced with local fisheries • Good communication with relevant organisations and local fisheries • Contingency plans developed • Work in partnership with relevant research groups • Partnership working with fishing industry and environmental partners • Use of seconded staff with additional expertise. • Use of outside agencies to undertake specialist work areas. 	2
	<p>Lack of accurate data leading to poor management of fisheries.</p> <p>Collapse of stocks.</p> <p>Decline in bio-diversity</p> <p>Loss of public amenity</p> <p>Degradation of the wider environment.</p>	<p>Well trained and qualified staff.</p> <p>Regular survey programme</p>	<p>Closure of a fishery due to over exploitation of stock.</p> <p>Fisheries not opened due to insufficient information available to gain consent through an Appropriate Assessment.</p> <p>Potential breach of UK statutory duty and EU infringement</p> <p>Possible Judicial Review with financial liability incurred by local taxpayers</p>	<p>High expectation that fisheries and environment are well managed by IFCA</p>		<p>Planned surveys lost due to poor weather or lack of survey vessel.</p> <p>Change of conditions for an Appropriate Assessment.</p>

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Failure to fully engage with stakeholders	4	3	4	4	<ul style="list-style-type: none"> • Regular contact with nature conservation bodies • Establish effective dialogue with relevant stakeholders • Introduction of proactive public education and outreach programme • Regular contact and dialogue with fishing industry, both commercial and recreational. • Dissemination of all survey data and management proposals • Respond to all relevant consultations • Improved website design • Regular/structured liaison with other enforcement agencies • Develop communication strategy • Publish quarterly reports on IFCA website • Develop a database of stakeholders and regularly update 	3
	<p>Conflict between different stakeholders.</p> <p>Non compliance with fisheries and environmental legislation.</p>	Difficult to identify and consult with relevant stakeholders	<p>Stakeholder requirements are not considered in management of the IFCA district fisheries.</p> <p>Possible breach of UK statutory duties & administrative law.</p> <p>Possible EU infringement.</p> <p>Possible financial liability for local taxpayers</p>	<p>Lack of trust in the IFCAs management processes.</p> <p>Misunderstanding of the IFCAs role</p>		Further improvement to contact with NGOs and other stakeholders needs to be targeted.

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Injury to staff due to unsafe working practices	4	2	4	3	<ul style="list-style-type: none"> • Safety training register maintained • Adequate budget to cover all training requirements • Well trained staff • Risk assessments available and regularly reviewed • High quality PPE issued to all staff • Scheduled safety drills conducted on vessel • Lone Working Policy adhered to. • Conflict Resolution Policy developed • Boarding Policy developed • Indemnity insurance obtained & maintained 	3
	Death or injury to staff	Well trained staff Provision of high quality safety equipment Well maintained IFCA assets	Injury claims, tribunals HSE/MCA investigations Possible criminal & civil proceedings with potential financial liability to local taxpayers	Poor morale of staff leading to problems with recruitment & retention Increased surveillance by regulatory authorities of IFCA's procedures and practices, with attendant costs		Regularly working in hazardous environments Difficult to mitigate for accidents Difficult to mitigate for the actions of third parties

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Failure to maintain effective financial management and control	4	2	4	4	<ul style="list-style-type: none"> • DCC audit of accounts • Finance sub-committee in place to review budgetary spend • Policy developed with regard to the Bribery Act 2010. • Restricted use of company credit card • D&SIFCA Financial Regulations • Restricted authority to sign cheques • Annual Plan • Production of detailed accounts • Maintenance of contingency funds • Indemnity insurance obtained for marine peril • Budget monitoring report presented at IFCA ¼ meetings • Asset register kept up to date and audited. 	1
	<p>Fraudulent activity leading to misuse and/or misappropriation of funds</p> <p>Unforeseen expenditure, major mechanical failure or total loss of patrol vessel</p>	<p>Limited staff access to financial information and authority to spend money</p> <p>Vessel contingency funds maintained</p>	<p>Lack of financial resources to carry out statutory obligations</p>	<p>IFCA funded through local taxpayer money, expectation to provide best value for money service</p>		<p>Very limited potential for large scale fraud or corruption</p> <p>Small scale misuse of consumable items is still possible</p> <p>Patrol vessel operating in hazardous conditions</p>

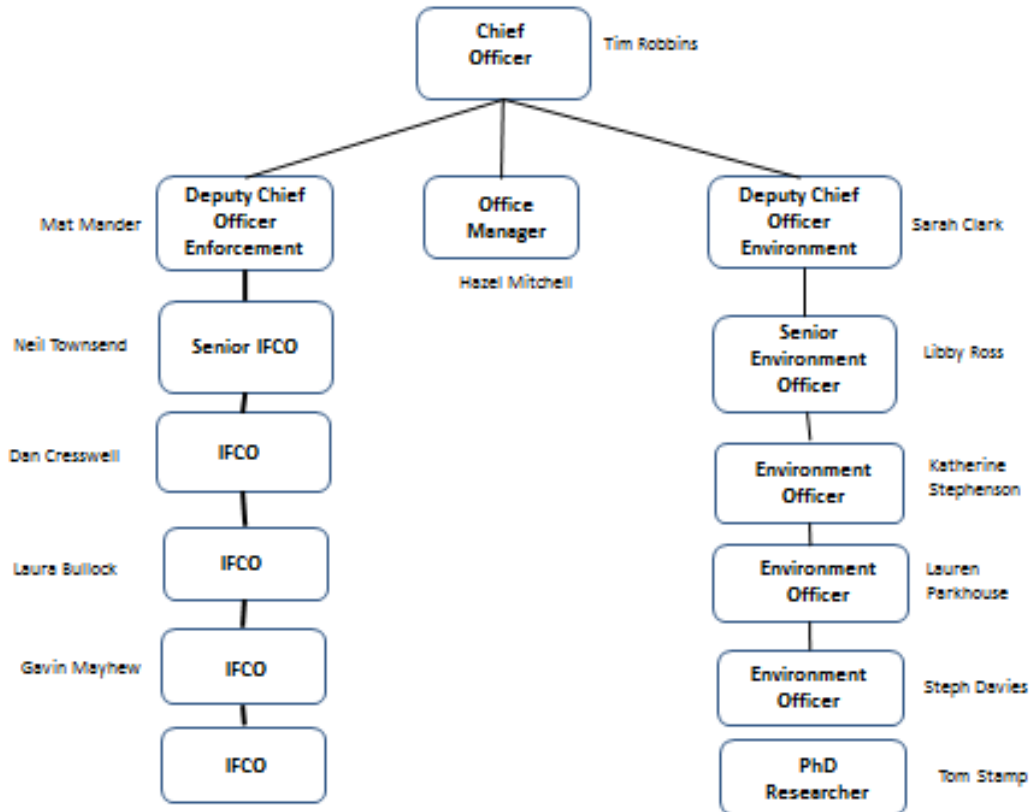
Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
<p>Fisheries in the district impacted by the activities of developers /industry</p> <p>Insufficient time to fully consider environmental impact assessments for offshore developments</p>	3	3	3	3	<ul style="list-style-type: none"> • Consultations responded to • Liaison with consenting agencies • Developer meetings attended by IFCA representatives • Database created holding information on current historical fishing activities within the district • Development of a Strategic Environmental Policy • Development scrutinized by DEFRA, NE & English Heritage • Consents required for developments • Development of baseline data sets 	3
	<p>Fisheries closed due to contamination.</p> <p>Significant fish / shellfish mortality</p> <p>Temporary or permanent loss of, or damage to, fish stocks, fishery habitats or fishing grounds</p> <p>Loss of public amenity</p> <p>Risk to public health</p>	<p>Lack of fishing activity data.</p> <p>Lack of baseline data</p> <p>Limited understanding of impacts of developments on the marine environment</p>	<p>Reduced catches and income from the fishery</p> <p>Displaced fishing activity</p> <p>Potential Judicial Review</p> <p>Breach of UK statutory duty and EU infringement</p> <p>Potential financial liability for local taxpayers</p>	<p>High expectation that the IFCA will represent the fishing and environmental interests, even when an activity may be occurring outside of the district</p>		<p>Increased wind farm development, dredging and number of MPAs</p> <p>High reliance on modelling to determine impacts of developments</p> <p>Lack of baseline data</p>

Description	Risk High 4 - 3 - 2 - 1 Low				Mitigation	Residual Risk
	Impact	Likelihood	Financial	Reputation		
Failure of vessel and vehicle assets	3	2	3	2	<ul style="list-style-type: none"> Highly maintained vessel 7 vehicles Extensive annual refits Establish preventative maintenance programme Maintenance schedule for all vessels adhered to Annual Workboat Code survey Service contracts with main equipment suppliers Annual survey on all vessels All equipment serviced in line with manufacturers recommendations 	2
	Limits enforcement and research capabilities Limited ability to undertake coastal visits	Patrol vessel is well maintained All vehicles are well maintained	Hiring of a replacement vessel / vehicle Significant mechanical failures are expensive and time consuming	Significant local taxpayer money invested in the service with a high expectation that the vessel provides value for money		Unforeseen events may lead to disruption of activities

		Impact			
		Low (1)	Medium (2)	High (3)	Very High (4)
Likelihood	Very High (4)				
	High (3)			1	1
	Medium (2)			1	5
	Low (1)				

- 1 - 2 Acceptable
- 3 - 6 Additional effort should be considered
- 8 - 12 Additional effort must be implemented

Staff Structure April 2017



Members of the Devon & Severn IFCA

Cllr Jonathan Hawkins	Devon CC
Cllr Rufus Gilbert	Devon CC
Cllr Ian Hall	Devon CC
Cllr Stuart Hughes	Devon CC
Cllr Vic Ellery	Torbay C
Cllr Nick Kelly	Plymouth CC
Cllr Terry Napper	Somerset CC
Cllr Peter Bryant	N. Somerset C
Cllr Fi Hance	Bristol CC
Cllr Robert Griffin	S. Gloucestershire C
Cllr Will Windsor-Clive	Gloucestershire CC
Mrs Natasha Barker Bradshaw	General Member
Mr John Butterwith	General Member
Mr Michael Cominetti	General Member
Mr Dave Cuthbert	General Member
Mr Stephen Gledhill	General Member
Ms Elaine Hayes	General Member
Mr James Marsden	General Member
Mr John May	General Member
Mr David Morgan	General Member
Mr David Murphy	General Member
Mr Simon Pollentine	General Member
Mr Jim Portus	General Member
Mr David Rowe	General Member
Mr Mike Williams	General Member
Mr Richard White	General Member
Ms Rachel Irish	MMO
Mr Simon Toms	EA
Mr Andrew Knights	NE

Glossary

AIFCA	Association of Inshore Fisheries & Conservation Authorities
ALB	Arm's Length Body
CO	Chief Officer
COG	Chief Officers' Group
CIFCA	Cornwall Inshore Fisheries and Conservation Authority
DCO	Deputy Chief Officer
DEFRA	Department of Environment, Fisheries & Rural Affairs
EA	Environment Agency
EMS	European Marine Site
HLO	High Level Objective
IA	Impact Assessment
IFCA	Inshore Fisheries and Conservation Authority
IFCO	Inshore Fisheries and Conservation Officer
MCZ	Marine Conservation Zone
MMO	Marine Management Organisation
MoU	Memorandum of Understanding
MPA	Marine Protected Area
NE	Natural England
OM	Office Manager
PO	Principal Officer
SAC	Special Area of Conservation
SCI	Site of Community Importance
SIFCA	Southern Inshore Fisheries and Conservation Authority
SoS	Secretary of State
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TAG	Technical Advisory Group
WG	Welsh Government
Wrt	with relation to

Definitions

This section gives a definition of general terms used in this document.

Severn Estuary – the area of tidal water above the M48 road bridge.

Bristol Channel – the area of the district below the M48 road bridge

Precautionary Principle – the D&SIFCA will follow the direction laid out by the UK Government - <http://www.hse.gov.uk/aboutus/meetings/committees/ilgra/pppa.htm>

Sustainability - Brundtland (1987): This is the most commonly quoted definition and it aims to be more comprehensive than most:

Sustainable development is development that meets the needs of the present without compromising the needs of future generations to meet their own needs.

It contains within it two key concepts:

The concepts of needs, in particular the essential needs of the worlds poor, to which overriding priority should be given, and:

The idea of limitations imposed by the state of technology and social organization on the environments ability to meet present and future needs.