



Enforcement Plan 2015-2016

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1. Introduction

On the 1st April 2011, the Devon and Severn Inshore Fisheries and Conservation Authority (the Authority) was fully vested under the Marine and Coastal Access Act 2009 (MaCAA).

The Authority took over the fisheries and conservation management responsibilities from the Devon Sea Fisheries Committee (DSFC) and the Environment Agency (EA) within the new district. The Authority's district¹ covers all tidal waters (out to six nautical miles from the 1983 baselines²) within Devon County Council borders in the south and from the Devon and Cornwall County Council boundary up to the Gloucestershire County Council border and up to Welsh waters to the north.

Fisheries management only succeeds with an integrated approach encompassing communication, research and enforcement.

Full compliance with EU, UK and local fisheries and environmental legislation is the overall aim of the Authority. This aim is best achieved through the adoption of an adaptive co-management approach to fisheries management. The key to achieving high compliance is ensuring that those users who are potentially affected have a real opportunity to engage with the Authority over the local management approach to be taken.

The Authority's new Mobile Fishing Permit Byelaw came into force on the 1st January 2014. The Byelaw represents the first legislative milestone in delivering the Authority's strategy of introducing a new and flexible approach to fisheries and conservation management. The permitting byelaw places all the management measures within the permit conditions. Importantly, it provides an opportunity to consider improving access within Marine Protected Areas to towed gear vessel if new evidence is made available and improved monitoring of fishing vessels is introduced.

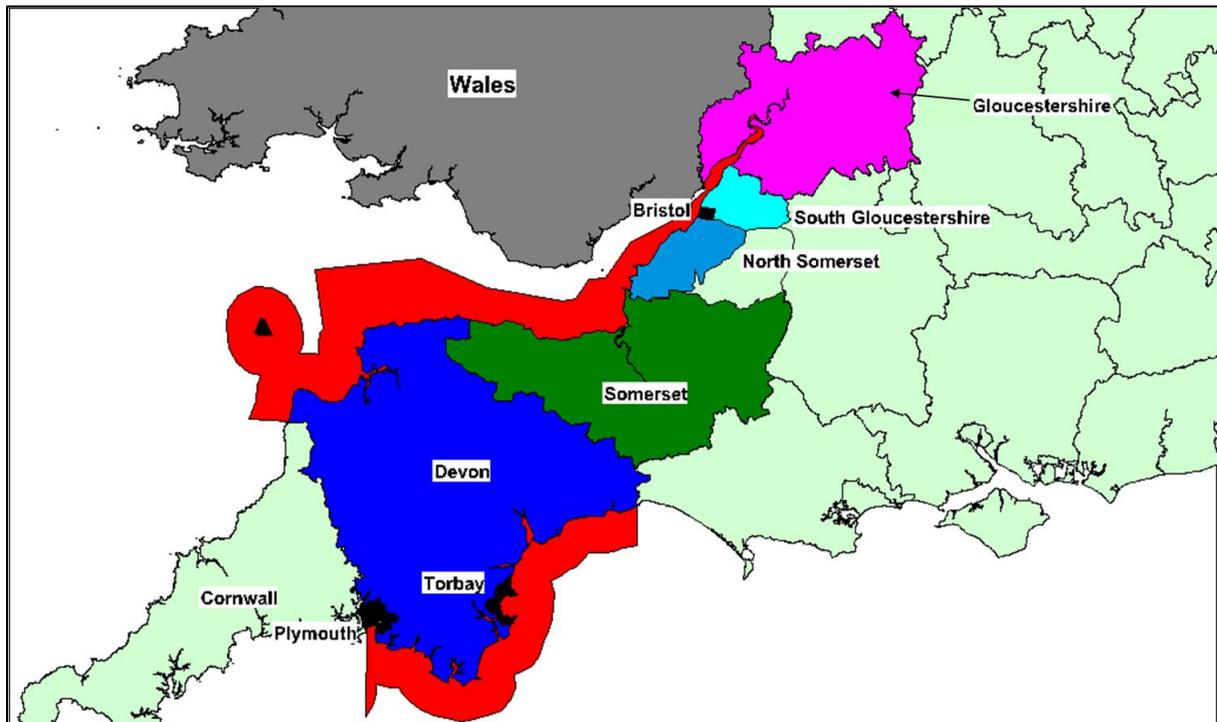
The Authority is also looking to introduce two more permitting byelaws in 2014-15. The Authority intends to consult on a Potting Permit Byelaw and a Diving Permit Byelaw during July and August. The Authority decided to review the proposed Potting and Shellfish Permit Byelaw using the lessons learnt from the successful introduction of the Mobile Fishing Permit Byelaw. One of the key strengths of byelaws is there is no ambiguity to whom the legislation applies to. The Potting and Diving byelaws will affect all persons taking shellfish using these methods. Most national and European legislation only applies to fishing activities taking place from, or in connection with the use of a vessel.

Effectively communicating the change in legislation will be a difficult challenge for the Authority. However, once in place permitting byelaws allow the Authority to communicate directly with permit holders. This is important as the different sectors have varying degrees of co-ordinated representation. Even where representation does exist it is hard to reflect he

¹ The Devon and Severn Inshore Fisheries and Conservation Authority Order 2010

² means the baselines as they existed at 25th January 1983 in accordance with the Territorial Waters Order in Council 1964 (1965 III p.6452A, as amended by the Territorial Waters (Amendment) Order in Council (1979 II p.2866).

full range of views held by fishermen. By engaging in the management process, the Authority and all the users get a far better understanding of the requirements of the other interested parties. Conflicts of interest will not always be resolved but, having gained an understanding of why actions are taken, affected users are far more likely to accept the approach taken.



Where consensus with the management approach is not achieved or where the potential gain is significant, the risk of illegal activity increases. The risk is even greater where an effective enforcement deterrent is not in place. The deterrent is only effective where the risk of enforcement action is high and the consequences are serious.

The Authority uses various compliance measures to ensure, where possible, that no person(s) illegally engaged in fishing related activity removes fishing opportunities for others or gains an unfair market advantage by breaking the rules and that law abiding person(s) are not disadvantaged by being compliant. It will also seek to use appropriate compliance and enforcement measures, where it considers it to be necessary, to ensure that the marine environment is not adversely affected by fishing activities. .

In recognition of the need to have an effective deterrent, fines applicable to byelaw offences have risen from a maximum of £5,000 to £50,000. (Section 163 of MaCAA). A further strength of the permitting byelaw approach is that in a case where the offence involved the breach of a condition of a permit issued under one of the Authority's byelaws, under Section 164(5) of MaCAA the Courts may suspend a permit or disqualify the person from holding or obtaining a permit for such a period the court thinks fit. This is seen by the Authority as a very important addition to the formal action that can be taken against persistent offenders where fines are shown not to have persuaded the fisherman to change his attitude to fishing.

Better regulation

Where the Authority undertakes compliance activity, it will work in accordance with the Hampton Principles of Better Regulation as set out in the Regulators' Compliance Code³ and the Legislative and Regulatory Reform Act 2006 (as amended⁴). In carrying out its functions, the Authority will ensure that:

- abide by the Code for Crown Prosecutors
- any action taken, including compliance related or investigative, is proportionate to specific, identified, risk or need for intervention;
- it is accountable for its regulatory activity – to its stakeholders, its partner organisations, Ministers, local taxpayers, the general public and the Courts;
- its actions are consistent, in that it should make similar (but not necessarily the same) decisions about activity in similar circumstances, in accordance with its delegated responsibilities, statutory objective and guidance;
- its regulatory actions are transparent, by publishing information to its regulated stakeholders indicating what enforcement action it can take and may take in appropriate circumstances;⁵
- all its activities and, in particular those that would place a "burden" on a regulated person (such as monitoring, inspection, investigation and compliance actions), are targeted using a risk based approach⁶, ensuring such action is for a specific identifiable need, for example, limiting random inspections to specific identified compliance requirements;
- Inshore Fisheries and Conservation Officers (IFCOs) appointed by the Authority are highly trained, competent and adhere to the inspection code of practice⁷; and
- it works closely with partner organisations to make best use of available resources and share information.

IFCA enforcement powers

It was recognised through the drafting of MaCAA that the enforcement powers available to the Sea Fisheries Committees (SFCs) needed updating to provide IFCA with a greater ability to effectively enforce the legislation available to them. Inshore Fisheries and Conservation Officers' (IFCOs) common enforcement powers are conferred by sections 245 to 261 and fisheries enforcement powers conferred by sections 264, 268, 269 and 284 of MACAA. IFCOs also have powers under Article 9(1)(c) of the Sea Fishing (Enforcement of Conservation Measures) Order 2000 as amended.

IFCOs have these powers for the purpose of enforcing:

³ <http://webarchive.nationalarchives.gov.uk/+/http://www.bis.gov.uk/policies/better-regulation/improving-regulatory-delivery/implementing-principles-of-better-regulation/the-regulators-compliance-code>

⁴ <http://www.legislation.gov.uk/ukpga/2006/51/contents>

⁵ Summary of enforcement actions attached in Annex 1

⁶ Fisheries risk matrix is attached in Annex 2

⁷ National IFCA code of practice for inspections

- Any byelaws made under section 155 or 157 of MACAA for the district (or having effect as if so made)
- Sections 1 to 3, 5 and 6 of the Sea Fish (Conservation) Act 1967 (c.84) and any Orders made under any of those sections.
- Any provision made by or under an Order under section 1 of the Sea Fisheries (Shellfish) Act 1967 (c.83)
- Any provisions of, or any rights conferred by, section 7 of that Act
- Any byelaws made under section 129 or 132 of MACAA.
- Section 140 of MACAA.
- Control Regulation (EC) 850/98.

IFCA enforcement training

Initial training was given to all enforcement officers transferring across from SFCs to IFCA's in the new powers set out in MaCAA. IFCOs from the Authority have already joined MMO training courses and further national training opportunities have been identified. It is expected that each IFCO's enforcement competencies will be assessed to nationally determined standards. The proposed Marine Enforcement Accreditation Scheme is being finalised. The scheme intends to provide officers with the opportunity to work through set modules and gain accreditations for each module successfully completed. In time this will mean that officers will gain recognisable qualifications and will provide opportunities for officers' skills and knowledge to be judged against common standards.

Working together

Partnership working with other enforcement agencies is a requirement under the Authority's Success Criterion 4. This approach is already well established within the Authority with joint enforcement meetings and inspections (at sea and ashore) being regularly undertaken by IFCOs and Marine Enforcement Officers from the MMO.

The Authority has formally seconded two EA Enforcement Officers on a part-time basis to undertake fisheries enforcement work on behalf of the Authority. In addition all thirteen EA enforcement officers that work within the Authority's district have been provided with limited IFCO powers under section 165 of MaCAA. Training in the use of these powers has been provided to the EA officers by the Authority's fulltime IFCOs.

The Authority liaises with other enforcement agencies including the Police (Civil and Military), Gangmasters Licencing Authority, Department of Works and Pensions, and other IFCA's.

Use of technology

The Authority recognises the potential benefits of remote monitoring technologies. The Authority continues to be directly involved in the national MMO and IFCA project to develop a national standard for the introduction of low cost, frequent reporting, inshore vessel monitoring systems (IVMS). The Authority had hoped to introduce the technology for all

vessel using mobile gear through the Mobile Fishing Permit Byelaw from 1st January 2014 but unavoidable issues have caused a significant delay in the roll out. Current predictions are that IVMS units meeting the national standards (type approval) will be available before the end of the year. There is potential for the project to be delayed further and if this were to happen the Authority may consider what other options are available. The successful introduction and use of IVMS is a key part of the Authority's enforcement strategy going forward.

IFCAs already have access to the Monitoring Control and Surveillance System (MCSS). This system collects fisheries effort data nationally to inform management and enforcement actions. Using such a system allows for greater intelligence sharing and better co-ordinated enforcement actions. IVMS will provide much more detailed activity information and will potentially cover all vessels. Currently only over 12m vessels are required to transmit positional data and the report interval is two hours. When IVMS is available the Authority would initially require all mobile fishing vessels to have the system fitted and report up to every minute.

Byelaw review

IFCAs are required to undertake a review of all of the inherited byelaws by April 2015. (Success Criterion 2) This provides the Authority with an excellent opportunity to develop legislation that supports better management of sea fisheries resources and increases its ability to deliver the duties under sections 153 and 154 of MaCAA. In line with the proposals set out in the Authority's Annual Plan, the aim of the byelaw review is to create a legislative structure that supports the delivery of MPA management, sustainable development of crustacea and mollusca fisheries and development of recreational sea angling

The review of the byelaws will also allow the drafting of legislation that is easier to enforce. The new byelaws will introduce deeming clauses, as is the case with the Authority's Mobile Fishing Permit Byelaw, to support the enforcement of the byelaws. The deeming clause will mean that whilst vessels are fishing⁸ in the district the catch on board will be deemed to have been caught in the district. The new byelaws will also assist the Authority's management of the illegal, unlicensed fishing activity that is a key pressure on both the commercial catching and recreational fishing sectors. The proposed Potting Permit and Diving Permit Byelaws would introduce limits on the number of pots that can be used and how many lobsters, crabs and scallops can be landed by non-commercial fishers.

Enforcement resources

The Authority currently employs nine members of staff that hold IFCO warrants. Undertaking day to day enforcement duties is the primary role for four of these officers⁹. Officers do not hold warrants until the Chief Officer is satisfied that they are competent in this role. The relatively low numbers of enforcement officers employed by the Authority, compared to other IFCAs, means that there is greater opportunities to join the limited number of officers on the national training programmes at present. It also drives better joint

⁸ Fishing defined in D&SIFCA Mobile Fishing Permit Byelaw

⁹ The Authority's full staff structure is set out in the Annual Plan

working in order to provide sufficient enforcement cover and encourages greater innovation in how to approach enforcement work in the district.

In 2013, the Authority took the decision to sell the main enforcement vessel, 21.9m 'Drumbeat of Devon'. The decision to sell the vessel reflected the Authority's new approach to enforcement and helped ease budgetary pressures. The enforcement approach requires the use of small vessels operating with less crew, more frequently from various ports on both the north and south coasts. The Authority believes that the use of small vessels in conjunction with IVMS will lead to better monitoring of fishing activity at a reduced cost to the public purse.

The Authority will continue to share the use of the EA's 12.5m enclosed wheelhouse RIB 'Proteus' on a rolling six month contract. The vessel has proved to be a useful surveillance asset with a good electronics package and the enclosed wheelhouse extends considerably the amount of time the crew can spend at sea.

In 2013, the Authority purchased an eight metre catamaran to undertake its survey work. The vessel however has a good electronics package and can also operate as an effective surveillance platform.

In addition to these resources the Authority has its own 6.4m RIB for patrol work on both coasts and has access to an EA 6.5m RIB based in Appledore to undertake additional enforcement patrols on the north coast.

Enforcement operations

The Authority operates a risk based approach to enforcement¹⁰. Officers are expected to develop enforcement plans that reflect the predicted risk but also reports of suspicious activity. The plans set out the activities the patrols are intended to monitor and then officers fill in the patrol log to record what actions were taken.

Suspicious activity information is shared between IFCA's, MMO and EA. The sharing of this information is crucial to ensure a co-ordinated; cross agency approach to enforcement is achieved. All inspections carried out by officers will be recorded on MCSS.

To support the reporting of suspicious activity the Authority introduced an out of hours contact number. The Authority felt that it was important that callers wishing to report suspicious activity had a realistic opportunity to speak to a Duty Officer that could as a minimum record the information to inform future patrols. The Duty Officer may have the opportunity to call officers on patrol and provide them with the information. Very often callers are reporting activity as it is happening and too often by the time the information is received the opportunity to react has been lost. The Authority has limited resources and cannot respond to all reports and managing expectations is important.

Enforcement priorities

The enforcement plan sets out the enforcement priorities for the Authority during 2014/15. The enforcement plan is based on the priorities outlined in the D&S IFCA Annual Plan 2014/-

¹⁰ Annex 2

2015¹¹ The main delivery areas for the Authority during 2014-15 are identified in the Annual Plan to be:

- The development of Marine Protected Area MPAs management plans;
- The long term sustainability and management of shellfisheries within the district
- The assessment and development of recreational sea angling (RSA) within the district.

The table below show that three work priorities and the primary enforcement activities that will be undertaken in 2014-2015.

	Priority 1 Development of MPA management plans	Priority 2 Sustainable Management of Shellfisheries	Priority 3 Development of Recreational Sea Angling
<i>Activity 1</i>	Monitoring and enforcement of towed gear activities within MPAs	Monitoring and enforcement of towed gear activities In potting zones ¹²	Monitoring and enforcement of Bass Nursery Areas ¹³
<i>Activity 2</i>	Introduce IVMS on all vessels operating mobile gear by the end of 2014.	Assist in the further development of the IVMS trials	Monitoring and enforcement of netting restrictions.
<i>Activity 3</i>	Monitoring and enforcement of static gear in MPAs	Shellfish landing inspections including lobster scrubbing testing	Monitoring and enforcing minimum size legislation.
<i>Activity 4</i>	Develop byelaws to assist the management and enforcement of MPAs	Develop byelaws to assist the management and enforcement of Shellfisheries	Monitoring activity in RSA zones

¹¹ Devon & Severn IFCA Annual Plan 2012-2013

¹² MMO licence condition prohibits use of towed gear in the main potting areas off South Coast of Devon

¹³ The Bass (Specified Areas) (Prohibition of Fishing) (Variation) Order 1999

Annex 1

Summary of enforcement actions

The Authority will endeavour to use an adaptive co-management approach, where compliance is achieved through engagement, understanding and advice. Where compliance is not achieved by this approach, the Authority has a range of enforcement actions available to it:

Verbal warning

A verbal warning is issued when a minor infringement in legislation is detected. This approach is used to remind person(s) of relevant legislation and is recorded. If the person(s) commits a similar offence, the individual involved may face a higher level of enforcement action.

Advisory letter

Where it is believed that breaches of the law may have been committed and it is appropriate to do so, an advisory letter may be sent reminding the person(s) of the need to obey the law. This may be sent without prejudice to other purely civil remedies.

Official written warning

Where there is evidence that an offence has been committed but it is not appropriate to implement formal prosecution proceedings, an official written warning letter may be sent to the regulated person(s), outlining the alleged offending, when it occurred and what regulation(s) were breached. It will also set out that it is a matter which could be subject to prosecution should the same behaviour occur in the future. This may be sent without prejudice to other purely civil remedies.

Simple cautions

A simple caution (known previously as a Home Office Caution) may be offered by the Authority. Issuance of a simple caution may be deemed to be the most appropriate means to deal with the offence(s), particularly where there is no identified financial gain. A simple caution is only offered when the Authority is prepared to instigate legal proceedings and prosecute if the person(s) decides to decline the simple caution.

Financial administrative penalties

The Authority may issue a Financial Administrative Penalty (FAP), the level of which may be up to £10,000, as an alternative to criminal prosecution in certain circumstances. There are four basic levels of administrative penalty depending on the nature of the offence committed and where it is deemed appropriate for a financial administrative penalty (FAP) to be offered. These range from £250 to £2,000 as set out in the first column of the table below.

Penalty levels	First offence	Second offence	Further offences
Level 1	£250	£500	Referred for prosecution
Level 2	£500	£1,000	Referred for prosecution
Level 3	£1,000	£2,000	Referred for prosecution
Level 4	£2,000	£4,000	Referred for prosecution

All penalty offences have been categorised. Each category of offence has been rated according to its seriousness to determine the basic penalty level. These levels also take into account historical analysis of court penalties while offering an incentive for the accused to choose against referral for prosecution.

Category	Penalty level	First offence	Second offence	Further offences
Marketing offences	1	£250	£500	Referred for prosecution
Miscellaneous	2	£500	£1,000	Referred for prosecution
Technical conservation (Gear)	3	£1,000	£2,000	Referred for prosecution
Technical conservation (Catch)	3	£1,000	£2,000	Referred for prosecution
Recovery offences	3	£1,000	£2,000	Referred for prosecution
Control offences (including Registered Buyers and Sellers and UK licence offences)	3	£1,000	£2,000	Referred for prosecution
Access	4	£2,000	£4,000	Referred for prosecution
Illegal, unregulated and unreported fishing offences	4	£2,000	£4,000	Referred for prosecution
Undersize fish offences (UK, EU, byelaw)	2	£500	£1,000	Referred for prosecution
IFCA access offences	3	£1,000	£2,000	Referred for prosecution
IFCA technical conservation (catch)	2	£500	£1,000	Referred for prosecution
IFCA technical conservation (gear)	2	£500	£1,000	Referred for prosecution
IFCA permit	1	£250	£500	Referred for prosecution

Further information on FAPs is available in the Authority's FAP guidance posted on its website

Prosecutions

The ability to take criminal prosecutions is essential in discouraging serious non-compliance. The purpose is to secure conviction and ensure that the offender can be punished by a Court at an appropriate level, thus acting as a deterrent to any future wrong doing to both the offender and others who may engage in similar criminal behaviour.

A prosecution may be commenced where it is felt that the matter is too serious or not suitable for another form of disposal such as a FAP, warning or caution.

In order to prosecute, the Authority has to be satisfied both that there is sufficient evidence of the alleged offending and that there is a clear public interest in taking criminal proceedings.

The Authority will only commence a prosecution if it is satisfied that there is a realistic prospect of conviction against each suspect on each charge on the available evidence. If a case does not pass this test, it will not go ahead regardless of how important or serious it may be.

If a case passes the sufficiency of evidence test, the Authority will consider whether it is appropriate to prosecute, or whether it is appropriate to exercise one of the enforcement options available to it as set out above. In determining the correct response in any individual case, the Authority will always take into account the public interest in prosecuting.

The following lists of public interest factors in favour and against prosecution are not exhaustive and each case must be considered on its own facts and on its own merits.

- whether the implications of the offending for the enforcement of the regulatory regime undermines the management approach taken.
- the impact of the offending on the environment, including wildlife, and also, where applicable, having regard to the objectives of Marine Protected Areas.
- with regard to offences affecting fish and fish stocks, whether recovery species are involved and any issues as to quota status.
- the financial benefit of the offending or other financial aspects of the offence, including the impact on other legitimate operators.
- whether the offence was committed deliberately or officials were obstructed during the course of the offending / investigation.
- the previous enforcement record of the offender.
- the attitude of the offender including any action that has been taken to rectify or prevent recurrence of the matter(s).
- where offences are prevalent or difficult to detect and the deterrent effect on others by making an example of the offender.

A prosecution is less likely to be required if:

- the court is likely to impose a nominal penalty;
- the seriousness and the consequences of the offending can be appropriately dealt with by an out-of-court disposal which the person(s) accepts ;
- the offence was committed as a result of a genuine mistake or misunderstanding;
- the financial gain or disturbance to sensitive marine habitat can be described as minor and was the result of a single incident, particularly if it was caused by a misjudgement;
- there has been a long delay between the offence taking place and the date of the

- trial, unless there are key mitigating circumstances that caused the delay;
- the person(s) played a minor role in the commission of the offence; the suspect is, or was at the time of the offence, suffering from significant mental or physical ill health.

Annex 2

Risk based approach to enforcement

The Authority operates a risk based approach to enforcement. The approach meets recommendations set out in the Hampton Review and makes best use of the limited resources available. The approach is delivered through identifying the fisheries that occur in the district that the Authority currently manages or enforces legislation against.

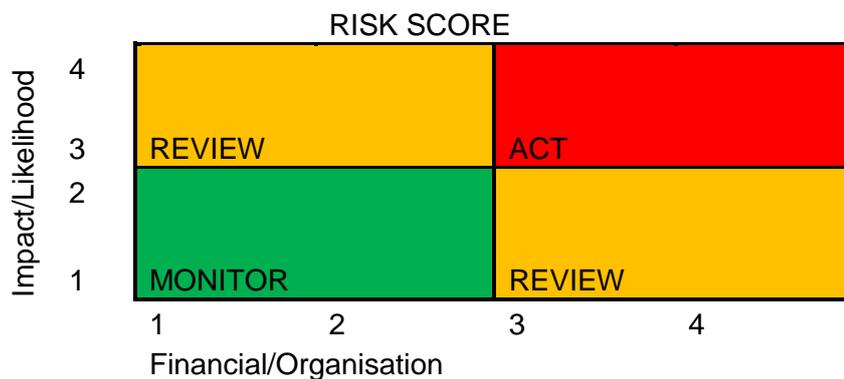
Once the fisheries are identified (below) the level of risk associated with each fishing activity is assessed against four criteria, Impact, Likelihood, Financial and Organisation (below) A score of 1-4 is recorded against each criterion. An average score from the criteria (Impact and Likelihood) and (Financial and Organisation) are taken and plotted against the matrix below.

Impact stock sustainability and effect on the wider ecosystem.

Likelihood level of activity predicted

Financial the socio-economic impact of the activity.

Organisation impact on the reputation of the authority and financial cost to enforce and manage due to non-compliance.



The risk matrix can be demonstrated by using the removal of undersize lobster as an example.

Impact (score 4) Lobster is an important part of the ecosystem being both a predator and prey species. Lobster is relatively slow growing so removal of juveniles impacts on the longer-term population structure. Restricting the removal of juvenile lobster is a key measure in the management of the stock.

Likelihood (score 4) The activity is known to have occurred and continues to be reported and identified.

Combined score 4

Financial (score 4) Undersize lobster commands a high price and is readily saleable to outlets. The availability of small lobster undermines the economic value of the legal, licensed commercial fishery. Lobster represents one of the most important fisheries in the District.

Organisation (score 3) Expectations of the public and catching sector are that this legislation is enforced by the Authority. Effective enforcement is currently made more difficult by having to enforce two MLS (90mm Carapace Length (CL) inside & 87mm CL outside) and requires additional staffing and vessel resourcing.

Combine score 3.5 - making the subsequent action 'Act' (apply an enforcement plan)

Once the level of action is determined, site specific enforcement plans are drafted for the activity. This may include the use of resources available from partner organisations. The specific enforcement plans are updated with any new information that is received. Each time a site specific plan is carried out a review of its effectiveness is undertaken during a monthly debrief with the officers involved. Identified and reported breaches of legislation update the fisheries risk matrix.

Annex 3 Fishery Risk Matrix

Fishery	Activity	Impact	Likelihood	Financial	Organisation	Score	Action	Partner
								Organisations
Bass								
	U/S	3	4	3	3	3.5/3	Act	MMO
	Nursery areas	3.5	3.5	3	3	3.5/3	Act	MMO
	Fixed Net	4	4	3	4	4/3.5	Act	EA
Scallop								
	U/S	3	3	3	3	3/3	Act	MMO
	Cut outs	3	3	3	3	3/3	Act	MMO
	Closed Area	4	4	4	4	4/4	Act	MMO
	7-7.	3	4	3	3	3.5/3	Act	
	Close Season	3	3	3	4	3/3.5	Act	
	Salcombe	3	2	2	3	2.5/2.5	Review	
Lobster								
	U/S	4	4	4	3	4/3.5	Act	MMO
	Berried	4	4	4	3	4/3.5	Act	
	Escape Gaps	3	4	2	4	3.5/3	Act	
	NTZ	4	1	4	3	2.5/3.5	Review	MMO/NE
B Crab								
	U/S (use as bait)	3	3	3	4	3/3.5	Act	MMO
	Escape Gaps	3	4	2	4	3.5/3	Act	
	Parts	3	2	3	3	2.5/3	Review	
Whelk								
	U/S	4	3	3	3	3.5/3	Act	MMO
Mussel								
	U/S (T&T)	3	2	3	3	2.5/3	Review	
	Closed Beds	4	2	2	3	3/2.5	Review	
	Dredging Closed areas	3	2	3	4	2.5/3.5	Review	NE
Mullet								
	No Netting (Estuaries)	3	4	3	4	3.5/3.5	Act	EA
Fishery	Activity	Impact	Likelihood	Financial	Organisation	Score	Action	Partner
								Organisations
Plaice								
Sole	Trawling	4	3	3	3	3.5/3	Act	MMO
Cuttle	(closed areas)							
Plaice	U/S	3	3	3	2	3/2.5	Review	MMO
Sole								
Spider	U/S	3	2	2	2	2.5/2	Monitor	MMO
Shore Crab	Removal (Tiling)	3	2	3	2	2.5/2.5	Review	NE/GLA
Mackerel	U/S	2	1	1	1	1.5/1	Monitor	
Velvet Crab	U/S	2	2	2	2	2/2	Monitor	
Winkles	U/S	2	2	2	2	2/2	Monitor	GLA
Surf Clam	U/S	3	1	2	2	2/2	Monitor	

Annex 4 Main fisheries