



# BREXIT: VOICES OF THE UK FISHING INDUSTRY

The impacts of Brexit on fishing livelihoods,  
as told by members of the UK fishing industry





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## EXECUTIVE SUMMARY

The UK fishing industry was frequently highlighted during the process that led to the UK's departure from the EU. Since Brexit was fully brought about from the beginning of 2021, the fishing industry has seen a range of impacts, many of which industry members have reported to be unexpected and unwelcome. Although the industry is diverse in terms of geography, scale, and fishing methods, detrimental impacts on livelihoods, business turnover, labour, exports, and access were reported across various segments of the sector. However, there is hope that the situation could be improved. The recommendations within this report highlight pathways that may bring this to reality.

This report presents a synthesis of views gathered from the UK fishing industry based on their experiences in the 12 months after the UK officially left the EU. While respondents are not representative of the entire sector, their answers provide useful insights into the direct effects of Brexit on individuals, businesses, and communities. Six key recommendations have been drawn from industry responses:

- Recommendation 1:** Ensure that quotas are distributed and managed more fairly.
- Recommendation 2:** Implement further restrictions on non-UK fishing fleet access to UK waters, and sooner than 2026.
- Recommendation 3:** Ensure effective and inclusive management of UK stocks.
- Recommendation 4:** Implement measures to increase the efficiency and reduce the costs of exporting.
- Recommendation 5:** Work with the EU to free up trade and remove regulatory and financial barriers.
- Recommendation 6:** Invest in infrastructure and new markets both at home and abroad.



## BACKGROUND

In summer 2021, Alistair Carmichael MP, Vice-Chair of the APPG on Fisheries, called for submissions from the industry regarding their experiences of Brexit. These submissions were used to inform a debate within Parliament. After this debate, Carmichael engaged with the APPG Secretariat to expand this call for submissions with the intention of producing a report drawn from direct experiences from the sector.

In winter 2021, the Secretariat and APPG Parliamentary Members sent a list of open questions across their sector networks, to include representatives from the small-scale and large-scale fishing fleets, the processing industry, and exporters. 13 detailed responses were received, which together with the 11 responses collected by Carmichael, provided a pool of 24 responses from which to inform the report. The majority of responses were from individuals, with the remainder from organisations representing specific fleets or regions from across the UK. Responses were principally from England or Scotland, and addressed both UK-wide and devolved aspects. Responses are not attributed, except for those already in the public domain.

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### The questions posed to respondents were:

- How has Brexit affected your livelihood?
- Has the turnover of your business changed?
- Have you found changes in the availability of labour?
- If you are involved in exports, have you seen any financial or regulatory impact since the start of January?
- Have any of the impacts been unexpected? If so, which and in what way?
- What key changes do you want to see to improve or protect your livelihood in the future?

All responses were anonymised, besides those drawn from public-facing documents or statements. This report was created from the synthesis of these responses, drawing heavily on direct quotes from the responses themselves. The report aims to be a resource for all involved in the fisheries sector, but in particular for policymakers and Parliamentarians seeking insight into how to best support the sector's future development in the post-Brexit landscape.

This report was compiled by the Secretariat for the APPG on Fisheries. The Secretariat is grateful to The Fishmongers' Company's Fisheries Charitable Trust and The Seafarers' Charity who kindly funded this report.

## EFFECTS ON LIVELIHOODS

### Financial uncertainties

Respondents had widely experienced financial difficulties resulting from Brexit, with many reporting uncertainties regarding their future, or observing closures or reductions in operations. In the introduction of an NFFO report (1) on the economics of the UK's Trade and Cooperation Agreement with the EU for the fishing industry, Chief Executive Barrie Deas wrote *'the assessment shows that there are very few winners and a great many losers'*.

Smaller businesses reported significant impacts. One respondent said that *'as a company, the first three months of [2021] were the hardest we have ever experienced in business'*, and another that *'almost 18 months of running a small business in a rural area at 30% less income, while costs are going up on a weekly basis, is worrying to say the least'*. One individual asked, *'Is there any light at the end of the tunnel for me, or is it the end of three generations of fishermen?'*

Associations and other organisations also reported financial difficulties on behalf of members. One commented that *'we have members leaving our association for the first time in years because they can't afford to pay a very small levy (1% of earnings), generational skippers have left the industry for jobs ashore, and we are seeing boats being sold on at a rate not previously experienced'*. Another respondent also observed that *'we have had some vessels leave the industry'*, while an organisation in Cornwall reported that a recent scoping study *'has highlighted that the number of fish merchants in Cornwall exporting to the EU has dropped to half a dozen since 1st January 2021 and may fall further'*. In an open letter to Defra (2), NUTFA (New Under Ten Fishermen's Association) said that without a change in EU access to the UK 6-12 mile nautical zone before 2026, *'there will be insufficient resources left to sustain the inshore fleet based on current and past observations'*.



## Quota

Looking to the future of Coastal State quota negotiations, respondents raised concerns about potential impacts on both UK fishing fleets and processors. On fishing, one respondent commented:

“The failure of the UK as an independent coastal state to reach an agreement with Norway and the Faroes in this year’s [2021’s] round of quota negotiations has ramifications for inshore fishing vessels, as pelagic and demersal vessels are displaced from their traditional fishing grounds and move further inshore. This may potentially lead to increased instances of gear conflict, where mobile fishing vessels tow away static fishing gear. It may also mean inshore vessels lose fishing grounds and are forced to less productive grounds.”

Another respondent feared that the processing sector would be severely impacted by ‘the inconsistency of whitefish supplies due to restricted access to Norwegian waters and international quota swaps’, which ‘plays greatly into the hands of importers whilst our Scottish fleet and supporting sector are suffering’.

## Bivalve production

Several respondents highlighted the severe impact of Brexit on live bivalve producers and exporters, in particular related to the ban on the export of most undepurated live bivalve molluscs from Class B waters from the UK to the EU. The director of NUTFA, writing for the Express (3), said that the ban ‘has had possibly the worst real-time impact, with businesses built up over many years on the verge of losing everything’. Another association reported that:

“The ban on exporting live bivalve molluscs and whelks to the EU has completely closed several market options. For whelks, France can’t be accessed, and South Korea’s whelk market has been flooded and prices dropped.”

[1] “Undepurated” bivalves are those that have not been treated by being placed in water for a period of time to purge them of any biological contaminants or physical impurities.



## CHANGES TO TURNOVER

Respondents widely described falls in income as a result of increasing costs, decreasing value of catches, and - in some cases - reduced volume of catches owing to the licensing of large EU fishing vessels. Most cost increases came from exporting, with these being built into pricing at different points in the supply chain. A fishermen's association noted that *'sellers have increased sellers' fees to cover costs of extra paperwork for exporting, and fish merchants are paying less for products as they have to cover the added costs of exports'*. One seafood wholesaler estimated the average total cost increase in 2021 compared to 2020 to be £70,000 per annum for a small business, and over £200,000 per annum for larger businesses. A few respondents had some post-Brexit costs offset via free transport from their local auction agents, or subsidised Export Health Certificates. However, this support was understood to be temporary. A supplier of fuel to fishermen also reported being *'well down on fuel sales'*, a demonstration of how falling fishermen's incomes may in turn have affected the onshore industry.

It was acknowledged by respondents that Brexit and the Covid-19 pandemic have both impacted the turnover of seafood businesses, with the effects of each sometimes difficult to tease apart. One respondent reported being affected by downturns in both exchange rates and customers, while a fisherman from Argyll and Bute, having seen prices *'collapse'* following the start of the pandemic, stated *'I find it hard to specifically judge the impact of Brexit on my business, although I know it's certainly not helped'*. The fishermen's association of which he was a member acknowledged this, while noting that increased export costs and EU market losses have contributed to a climate in which *'the income of individual boats fell by as much as 50%'*. The association had anticipated that Brexit would compound the challenges facing its fishermen due to decreasing economic resilience over the past few decades, and these fears were reportedly borne out.

Anecdotal evidence of losses was statistically supported by an NFFO report published in 2021, which reported that *'the bulk of the UK fishing fleet is on a trajectory to incur losses amounting to £64 million or more per year, with a total loss in excess of £300 million by 2026, unless changes are secured through international fisheries negotiation'* (1).



## CHANGES TO LABOUR

Labour shortages have affected some, although not all, respondents. Some of the causes identified may be longer-standing, for example a lack of prospects for career development in the sector. However, with EU workers previously helping to meet some of the shortfall, Brexit appeared to be exacerbating shortages. Low wages and ‘uncertainty in the sector’ were reportedly driving away both domestic and non-domestic workers from boat crews, processing, and transport. Meanwhile, the cost of hiring EU workers has increased due to the requirement for employers to sponsor their visas.

Some vessels have turned to workers from countries such as Ghana and the Philippines in response to the difficulties of hiring and retaining UK workers and, since Brexit, EU workers. The director of NUTFA wrote that ‘a recent relaxation in freedom of movement will allow these foreign workers entry and this can either be considered to be a vital lifeline for these vessels to keep operating or yet another nail in the coffin of local jobs on local boats’ (3). Processors and larger-scale trawl fleets are reportedly particularly reliant on non-EEA workers. Other respondents similarly raised concerns around hiring non-EEA workers with regards to labour exploitation and further depression of wages in the sector, with one saying, ‘Brits are experiencing social dumping and denied jobs as non-EU crew members are “two for the price of one”’. Such comments are borne out by a report (4) published in May 2022 by the International Transport Workers’ Federation on the exploitation of migrant workers on UK fishing vessels using transit visas. Under current UK immigration law, non-EEA workers cannot work in the UK or its territorial waters (within 12 nautical miles of the coast). As a result, once a worker has transited through the UK to a vessel, they may be confined to the vessel for up to a year where they can be vulnerable to labour and human rights abuses.

One fishermen’s association seeking to attract new entrants to the industry said:

“ We are very aware that [the industry] needs to be secure and attractive for new starts to want to take a gamble on fishing as a new career. This is a difficult task for associations with reduced resources and a growing portfolio, but we are attempting to do this working with charitable organisations. ”





## IMPACT ON EXPORTS

### Increased regulatory costs

All respondents involved in exports reported significant regulatory impacts, with financial consequences. Exports became subject to much greater quantities of paperwork, including health certificates, catch certificates, storage documents, process statements, packaging lists, and commercial invoices. An example was given of a mixed load of live shellfish for which *'the paperwork has gone from one to several hundred pages'* (director of NUTFA (3)). More staff hours were required to complete additional paperwork, with one seafood wholesaler calculating this to cost an average of £200 per day for his business. A Dorset fisherman reported losing nearly all his business *'mainly due to the paperwork involved and the financial cost to carry on'*.

Health certificate requirements particularly affected exporters of live crustaceans and bivalves due to the cost and time needed to carry out tests. Other costs of exporting to the EU included customs checks and VAT agents' fees. One respondent reported that several exporters had been left out of pocket for a year for sums of up to £100,000 as they waited to be paid back for EU VAT fees since Brexit had come into effect. Although they will not be required to pay such large sums in future, one exporter was now paying an additional £2,000 per month for a French accountant to handle their monthly VAT returns.

The apparent barriers posed by paperwork were not limited to UK businesses. One Producers' Organisation said that Belgian vessels fishing in the southwest previously landed their catch at a British port, *'but now they steam back to the EU to land to avoid the paperwork'*. Reductions in the number of vessels landing catch in British ports may result in loss of business for the UK onshore seafood industry.



## Additional costs due to delays or paperwork mistakes

All exporters experienced delays due to increased quantities of paperwork, which had a knock-on effect on processing times. One respondent shared their view that nearly all lorries entering the EU from the UK were being physically checked at Border Control Posts (BCPs), in comparison to the spot checks they perceived taking place on shipments from countries such as New Zealand. Where problems with paperwork arose, adding further delay, this was because documents had been deemed by BCPs to be inaccurate, incomplete, or late. However, these problems were in some cases considered by exporters to be trivial, with examples including labels reading “UK” rather than “United Kingdom”, and a scientific name being misspelt for one species in a consignment.

For many, border delays resulted in increased storage and transport costs. One respondent reported that transport costs had risen significantly due to the combined effects of delays and new regulations resulting from Brexit, and labour shortages resulting from Covid-19; they noted that it was *‘difficult and sometimes impossible to make transport connections in the EU, which costs companies the full loss of the cargoes exported’*. Costs were sometimes, although not always, shared between the fishers, fish markets, and transport companies. One small exporter experienced four failed attempts to export the same shipment of frozen fish, writing that *‘any hope of profit was lost after the first failed despatch, [and] now it is a case of limiting the losses’*.

Even where paperwork problems were resolved, delays acted to depreciate the quality of the seafood being exported, with many exporters incurring losses of revenue or goods due to spoiling. Some fishermen found themselves having to accept lower prices for their goods instead, while one from Ayrshire reported that *‘problems in the supply chain caused quotas on the catch of each boat being imposed by the processor we land to’*. One respondent noted they had shipments deliberately destroyed at the border by SIVEP, France’s Veterinary and Phytosanitary Border Inspection Office, resulting in a loss of £60,000 worth of goods. The decision to destroy the shipments was in their view *‘based upon a sensory assessment, which is not suitable for a number of species and is widely condemned by myself and other peers in the industry’*.

In an open letter to the Prime Minister (5), the Scottish Fishermen’s Federation reported that some of its vessels *‘are now making a 72-hour round trip to land fish in Denmark, as this is the only way to guarantee that their catch will make a fair price and actually find its way to market while still being fresh enough to meet customer demands’*. It is noted that the government responded to calls from the Scottish Fishermen’s Federation and others to provide compensation to seafood exporters experiencing delays as a result of Brexit, opening a £23 million fund (6) for this purpose for small and medium enterprises.

## Loss of business and markets

Increasing costs from paperwork requirements and problems at borders had a knock-on effect on the ability of exporters to access certain overseas markets. For example, one respondent reported that *'sales to the EU have fallen by 65-70% on molluscs and at least 60% on live crustaceans and remaining sales have been to wholesalers instead of bespoke smaller more profitable merchants and retailers. The economics of these [formerly] more profitable smaller sales have been destroyed by costs such as health certification, customs checks, and VAT agents' fees'*.

Similar impacts were felt by respondents of various backgrounds. A pot fisherman said he was *'having to throw at least 90% of the catch back'*, because while demand still existed, his former buyers were dissuaded by onerous paperwork and export costs, compared to buying similar products from Ireland. A respondent from the shellfish aquaculture industry faced similar difficulties, reporting that *'we were sending between 50 and 100 tons of large oysters to Europe every year at an average price of 1,500 euros per ton, but we have not sent a single oyster to the EU since January 2020'*, resulting in lost sales amounting to £300,000 since 2020. In another example, a small fishmonger found that *'our sales to one customer in Belgium made up around 35% of total sales pre-Brexit, but that has now fallen to under 5%'*. One fishermen's association saw the loss of markets in the EU and EEA as its products became *'less reliable or more costly'*, with the result that its vessels had attempted to regain a foothold by setting much lower prices than the quality of their seafood would normally achieve.

Exporters also reported increased difficulties in targeting different markets at different times. A fishermen's association noted that some of its vessels used to send fish to Belgium at Christmas and New Year, when the UK market is typically poorer, *'but the paperwork has made this too challenging'*. The respondent from the shellfish aquaculture industry echoed this comment, writing that prior to Brexit, *'we used the French market as a safety valve; if we had an excess of stock, we knew that we could sell it'*.

In addition to withdrawal from existing markets, some respondents felt that Brexit had made it more challenging for UK businesses to access new markets or expand their market reach *'due to the high costs of sending product samples to potential customers'*. NUTFA, which represents the UK's under-10 metre fishing vessels, has publicly stated that *'the main worry now is the permanent loss of markets in Europe'* (3). One respondent considered calls for the sector to look to New Zealand, Australia, and Canada as potential alternative markets to be *'unhelpful'* given *'the perishable nature of seafood, increased consumer demand for food with fewer food miles, and a lack of recognition that all three of those countries are huge producers of fish and shellfish, making their markets hard to compete in'*. Another respondent was concerned that future new trade partners could be *'less exacting on the origins of the fish, which doesn't bode well for environmental protection'*.

## Disproportionate impact on small-scale operators

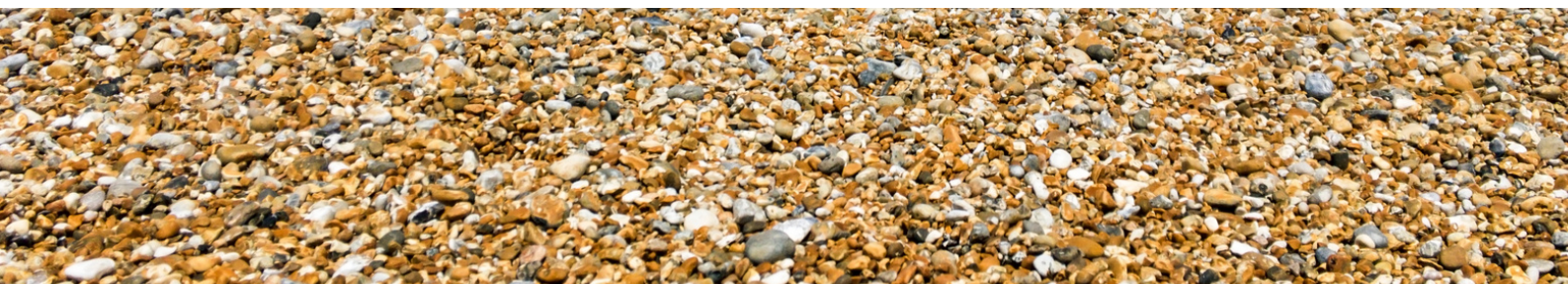
Small-scale exporters who responded to the call for evidence for this report felt they were more affected by Brexit changes in comparison to larger exporters. One fishermen's association found that *'some of our smaller exporters stopped exporting for the first part of the year because they did not have the capacity to get through the paperwork'*. Another exporter said, *'we have only managed to dispatch four times this year, and on each occasion, rather than the paperwork becoming more familiar and less onerous, it has become harder'*.

However, the key difficulty that affected small-scale businesses was that of groupage, where multiple exporters send their goods on a single lorry to save on transport costs. After Brexit, groupage reportedly became riskier, because *'if one shipment is rejected due to errors in the paperwork or due to failing a health inspection, the whole load is rejected'*. In turn, this *'puts considerable pressure on the haulage companies, who have trucks and drivers held up at ports for days on end, at considerable cost'*. According to one exporter, *'many of the haulage companies have simply stopped offering groupage services'*, and whereas it used to cost them around £240 to send a pallet by groupage, their last shipment cost £1,300 which made it *'financially unviable'*. Cornish fishing industry stakeholders expressed concern that because of the new risks involved in exporting, *'without any intervention from the UK government, the market is likely to consolidate around a few larger players'*. This had already occurred according to one respondent, who stated that *'exports have been consolidated into a few main companies which has led to fewer competitors'*.

Among some respondents who had experienced challenges with exports, there was cause for a degree of optimism:

“ *The current situation is that some prices have steadily improved in the last few months, and that the process of exporting is becoming slightly better, although much more complicated than pre-Brexit conditions. Of course, this improvement is fairly recent and will not make up for the huge impact felt particularly by our inshore shellfish fleets.* ”

“ *There has been a steadying of the ship as customs agents have become better equipped to carry out their duties. Naturally, there are still ongoing costs that were not present previously, but I feel that this is something which at least businesses can plan for, and were planning for prior to 1 January 2021.* ”



## UNEXPECTED IMPACTS

On unexpected impacts, respondents most commonly cited the perceived unfairness of the EU-UK fishing deal. Reviewing the overall tonnages of fish that the EU and UK had secured in the deal, the NFFO concluded that *'a deal that permits the EU fleets to catch 42,000 tonnes in UK waters and allows the UK to catch only 12,000 tonnes in EU waters replicates the imbalance in quota shares that has been a source of great controversy since quotas were introduced in 1983'* (1). Respondents focused in particular on EU access to UK waters until mid-2026, including access to the 6-12 nautical mile coastal zone, and quota allocations. One exporter characterised the deal by saying: *'in reality, the Brexit deal resulted in the EU agreeing to hand over 25% of their current fishing quota of certain UK fish stocks [to the UK]. The EU currently has rights to fish a third of the total quota from UK waters, so this uplift for our fishers actually works out at just 8.3%'*. Meanwhile, in a letter to the Prime Minister (5), the Scottish Fishermen's Federation wrote:

*"We find ourselves with an outcome where the EU fleet will continue to have full and unfettered access to UK waters until the middle of 2026, and should the UK want to change these arrangements at that point, the EU can impose a suite of punitive sanctions on the UK. No other coastal state in the world is in this position... Of major concern, however, is the outcome for many key whitefish species. Your deal actually leaves the Scottish industry in a worse position on more than half of the key stocks and now facing acute problems with North Sea cod and saithe in particular."*

One Shetland fisherman was also frustrated at the handling of quota for cod, writing:

*"There is more cod around Shetland right now than anytime in living memory, but our quota is minuscule. It has been said by skippers recently that you can catch your year's quota in one day! There are also plans to cut the cod further in 2022, so it begs the question: why are we still using the broken quota system the EU put in place now that we are an independent coastal state?"*



The EU-UK fishing deal was considered by representatives of the small-scale fishing industry to be particularly unfair to them. The director of NUTFA wrote (3) that *“taking back control” has resulted in only a net nine percent increase in fish and with the species concerned, almost nothing of value for the UK’s smaller scale fleet, who already have to subsist on only two percent of the national quota, despite making up 79 percent of the fleet by number’*. The majority of under-10 metre vessels use static gear, however, access to UK coastal waters by large-scale vessels - both UK and EU ones - *‘limits the ability of the small-scale fishers to leave their gear out beyond 6 nautical miles for fear of the supertrawlers towing it away’*. The NFFO (1) also drew attention to the disparity between large- and small-scale vessels in terms of pelagic quota, writing:

“Of the total assumed benefit of the UK quota uplifts by mid 2026 (£148m), some £57.8m is likely to be paper fish and of no benefit to the UK fleet – particularly the inshore vessels. This leaves a balance of £90m. Of this, £71m goes to the pelagic vessels, leaving a rump of c.£19m for the overwhelming bulk of the UK fleet.”

One fisherman attributed falls in catches of demersal fish and non-quota fish stocks in the Channel, and sprat stocks in the southwest, to licensing of large fishing vessels. Others observed that industrial fishing fleets from France, Belgium, and the Netherlands appeared to have increased their fishing effort in UK waters since Brexit. One fishermen’s association said that *‘quota uptake on the face of it appears to be good’* but that this was countered by the fact that *‘the large European fleet is still allowed to fish up to the UK’s 6-mile limit with industrial vessels, including large beam trawlers as well as the French trawling fleet’*.

There was also concern that post-Brexit quota allocations were increasing competition between large and small-scale UK fleets, with another fishermen’s association stating that:

“As the larger fleets in the north haven’t on the whole achieved the quota aspirations they had, the pressure is on them now to try and secure the most domestic fish they can. In reality, we see this presenting a real threat to the coastal inshore fleets around the coast regionally having a fair chance to even think about diversification.”



Several other issues related to quotas were raised. A Producer Organisation reported that *'we were unable to swap quota internationally for the first six months of the year and there is doubt over whether we can do cross-year international swaps, which has led to lost fishing opportunities this year and next'*. This represents an impediment to Producer Organisations, a key function of which is to manage quotas. Meanwhile, a fishermen's association reported that its fleet had suffered from *'instability of access to markets through potential direct action of blocking of exports to France over fishing access'*, with this concern *'ongoing'* at the time of writing to the APPG. Although some respondents had seen quotas for some species markedly increase, one fisherman highlighted that in the case of an additional pelagic quota, *'the infrastructure is not in place to handle this fish, which has severely restricted this new opportunity'*.

Respondents also raised equipment and technical issues. One Producer Organisation found that *'obtaining equipment for vessels has been challenging due to administrative burdens of customs and the cost of duty'*, while another respondent had experienced *'system failures with software/labels required to export post Brexit'* and *'a cold storage/freezing capacity issue'*.

One fishermen's association highlighted that Brexit had for them resulted in *'an increase in the need for representation from the fishing industry in meetings with government, and the media, all on a much-reduced budget'*. Because of the resources needed to *'navigate'* Brexit, the association encountered other opportunity costs:

*“Many science projects which are very badly needed due to data deficiencies just haven't happened. This is not the fault of any organisation, but it can have real-life implications as to how fisheries are managed and what opportunities are possible. In our area we have seen finfish trials and spurdog trials, both key priorities for local fishermen, paused or halted.*

”



## RECOMMENDED KEY CHANGES

Respondents were asked for suggestions on possible changes to improve or protect their livelihoods in the future. Responses were many and varied, and have been grouped below.

### RECOMMENDATION ONE

#### **Ensure that quotas are distributed and managed more fairly.**

Several respondents felt that quotas were currently unfairly distributed, in part because of a quota auctioning system which privileged large businesses, and the relative power of Producer Organisations which were less accessible to under-10 metre vessels owing to the smaller amount of quota they were able to bring with them. Overhauling the allocation of quota by auction would, in one respondent's words, *'allow young folk like me to reinvest in the industry to keep it going'*. Another felt that *'the provision of quota to encourage and support new entrants is vital if the sector is going to survive in the long term'*. In addition to fairer distribution of quota, which would be expected to increase the incomes of beneficiaries, increasing quota shares among smaller vessels would reduce barriers to their entry to Producer Organisations.

One Producer Organisation reported benefitting from additional quota that had been obtained by the UK through Brexit and then allocated via the Fixed Quota Allocation (FQA) system. They wished for this additional quota to continue to be allocated via FQA.

### RECOMMENDATION TWO

#### **Implement further restrictions on non-UK fishing fleet access to UK waters, and sooner than 2026.**

Many respondents felt that urgent restrictions on non-UK fishing fleets were needed to ensure the sustainability of UK fish stocks and the livelihoods of UK fishers. Commenting specifically on the continued access by EU fishers to the UK's 6-12 mile zone until at least 2026 – when access is due to be reviewed – respondents wanted this to be withdrawn much sooner, if not immediately. Some respondents wished to see restrictions on all non-UK vessels, for example: *'In the future, I believe there should be no foreign vessels within the 12 mile limit, and the numbers of foreign vessels granted licences to fish in UK waters should be decreased'*. Another recommended that the government *'reinstate the 1988 Merchant Shipping Act to regain more control over UK waters, and coupled with this, keep foreign vessels outside the 220 metre or 120 fathom continental shelf contour line, to keep UK and non-UK fleets separated'*.

Restricting access to UK waters by non-UK industrial fishing fleets was another priority. Fly shooting, a method also known as Danish seining, received particular scrutiny due to being *'an extremely efficient and effective method of catching fish'*. One respondent wrote that *'there are currently 75 of these large and powerful vessels, almost all in foreign ownership, licenced to operate in the English Channel and western waters; these licences should be cancelled pending an in-depth assessment of the impact of such a method'*.



### RECOMMENDATION THREE

#### Ensure effective and inclusive management of UK stocks.

There was support for changes to policy and management bodies in order to better manage UK stocks. A general comment was that *'advisory boards should include qualified fishermen, ex-fishermen, or fish processors'*. Regarding non-quota species, one respondent thought that Brexit had *'introduced uncertainty around [their] management'* and that *'well-considered policy is needed to manage the stocks sustainably, rather than the tonnage limit set out in the TCA'*.

Another respondent suggested a more substantive overhaul of fisheries management by creating *'a new management body in government with power over Defra'* or a merging of various other existing bodies such as the MMO and the IFCA's. Specifically on the under-10 metre sector, one respondent wanted the MMO's management to *'at least be undertaken in a co-management partnership'*. Such a partnership could be built alongside organisations such as Fishing Into the Future, which supports members of the fishing industry to become more involved with fisheries science and management.

To aid recovery of fish stocks, one respondent recommended that all fly shooting and *'factory ships'* be barred, at least from English waters, *'as there is a massive over-capacity problem in the over-20m sector in English waters'*. Another respondent wanted *'all industrial fishing to be banned within the 12 mile limit'* at minimum.

### RECOMMENDATION FOUR

#### Implement measures to increase the efficiency and reduce the costs of exporting.

Respondents wanted a more responsive support function from the government to help them quickly resolve export challenges as and when they arose. This could be in the form of *'a new ministerial or Defra department'* or *'a phone helpdesk in line with the current MMO offer'*. Assistance would need to be available on weekends *'because this is actually when we have experienced a number of our challenges and there is little to no support available'*. Beyond emergent issues, export paperwork guidance was currently *'difficult to navigate'* and would benefit from being updated.

The process of completing export paperwork could be reduced in cost – particularly for places with *'dispersed geography'* such as Cornwall – if Defra were to *'reach an agreement with the EU that would allow a move to electronic export paperwork'*, although this would not address administration costs. In relation to this, it was commented that *'Defra should continue to subsidise costs of Environmental Health Certificates, as a return to full cost recovery will add costs to a sector that is already struggling'*. Other means of reducing costs could be to *'continue funding of customs agents on both sides of the Channel, as more competition in this area will push up standards and reduce pricing'* and, in the case of the Cornwall seafood industry, to *'encourage Brittany Ferries to offer a minimum of one ferry crossing a week during the winter period, noting that a logistics hub in the southwest is unlikely to address export issues given the nature of smaller consignments'*. Where unanticipated costs had been incurred due to the destruction of goods by customs officers, a respondent who experienced this recommended setting up *'a knowledgeable seafood panel to determine whether there is a case for a claim, where insufficient evidence has been provided by SIVEP [France's Veterinary and Phytosanitary Border Inspection Office]'*.

## RECOMMENDATION FIVE

### Work with the EU to free up trade and remove regulatory and financial barriers

One respondent recommended that the government *'set up a UK-EU agreement on mutual recognition of standards that would allow spot checks at border control posts (BCPs) rather than close to 100% checks at EU BCPs which is happening at the moment'*, noting that *'the EU takes a spot check approach to imports from countries such as New Zealand, so this solution is possible for UK exports'*. A similar comment was that *'the UK should join an EEA to trade freely with the EU and reinstate a form of customs union, which would relieve all problems except transport costs'*.

Two more specific areas where the UK could focus on working with the EU were identified. The first was *'to ensure that VAT repayments [on UK-EU exports] are paid more quickly, or do not have to be paid in the first place'*, which has since been resolved. The second was to *'lift the EU ban on the import of undepurated live bivalves from class B waters'*, as *'there is absolutely no change to the sanitary or disease status of the animals and commercial interests on both sides of the divide want this resolved'*, and the respondent feared that without resolution *'the industry will eventually fold'*.

## RECOMMENDATION SIX

### Invest in infrastructure and new markets.

In addition to the need for financial support or compensation for fishermen and businesses experiencing losses due to Brexit, several respondents identified the need for longer-term investment across the industry. One association wrote *'we need investment in boats to make them safe, many being around 50 years old. We also need shoreside investment in processing facilities and marketing work to develop new sustainable fisheries and markets, and help with the resilience and costs for the local fleet post-Brexit'*. A comment specific to Scotland was that *'we need to be planning and preparing for the next 5 years for the Scottish seafood sector. This includes capital investment – a vision for youth and [the Scottish] government setting out a path for industry to work towards'*. It is noted that government funding has been made available for investment in the seafood industry, in the form of the Marine Fund Scotland (8), and the Fisheries and Seafood Scheme (9) (FaSS) in England, with fishers able to access support in applying to FaSS from the Fishing Animateur project (10).

Finally, given the extensive problems experienced by shellfish exporters, one respondent recommended that the government *'provide funding to market our fish and shellfish to the domestic market'*. It is noted that the government recently announced (11) £1 million in funding to promote UK seafood to international markets.

## CONCLUSIONS

The APPG on Fisheries received a diverse mix of responses on the impacts of Brexit, although all were characterised by significant concern around financial losses and the long-term viability of individual businesses, fishing fleets, and other sectors of the UK fisheries sector including processors and transporters. Many respondents had already been experiencing difficulties prior to Brexit and to the Covid-19 pandemic, such as labour shortages and diminishing catches or quotas. However, Brexit appears to have been the final trigger for, in the words of one fisherman, *'a perfect storm'*.

Adding to this is a sense of unfairness and frustration at the impacts of Brexit, which for some respondents appears to have been heightened by the expectations they held prior to the publication of the Trade and Cooperation Agreement. One fisherman, when asked if any of the impacts he had experienced had been unexpected, answered *'all of them, because we were told we would be getting the independence of our sovereign waters back and that has not happened'*.

It must also be acknowledged that the Covid-19 pandemic also contributed to many of the issues faced by the industry, in particular with regards to trade and labour availability. Teasing apart the respective effects of Brexit and the pandemic on the industry is challenging, and in many cases they appeared to influence and compound the effects of one another.

Despite an overall clear sentiment that the effects of Brexit were principally negative, some potential positive effects were recognised. Among respondents who had faced challenges in exporting their goods, it was acknowledged that problems which emerged at the outset of Brexit had since improved. There was also cautious optimism regarding quota upticks in some instances, though it was emphasised that this should be accompanied by relevant and fair support.

Respondents had a broad array of suggestions for how the sector could be supported in navigating the post-Brexit landscape. These were broadly grouped as follows:

- Ensure that quotas and tonnage limits are distributed and managed more fairly.
- Ensure effective and inclusive management of domestic stocks.
- Implement further restrictions on non-UK fishing fleet access to UK waters, and sooner than 2026.
- Implement measures to increase the efficiency and reduce the costs of exporting.
- Work with the EU to free up trade, and remove regulatory and financial barriers.
- Compensate exporters who have been found to have had goods destroyed or experienced delays due to the challenges of adjusting to new export requirements.

This report aims to provide a clear, direct insight into how the UK fisheries sector feels that government, Parliament, and other stakeholders could best act to ensure the future security and prosperity of the industry. Though respondents felt Brexit had not worked in their favour, some expressed hope that the situation could be improved, and the recommendations within this report highlight pathways that may bring this to reality.

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