

- 1) As an ex professional fisherman holding a skippers certificate of competency I maintain a strong interest in the marine environment and the Cornish fishing industry as it still provides valuable business for me as a service provider to the marine sector.
- 2) I am also very fortunate and privileged to be a member of Cornwall Sea Fisheries Committee where I represent the interests of recreational sea angling which gives me an insight of the complex conservation and management issues that currently bedevil the fishing sector.
- 3) In any discussion with regard to fisheries policy it is an essential prerequisite that all engaging in the process accept unreservedly that the RESOURCE is paramount, without vibrant healthy seas supporting abundant fish stocks, marine organisms and bird life anything else is pointless, this necessarily dictates that narrow sectional interests or political dogma must never take precedence over the well being of that resource.
- 4) Fisheries and the marine environment must be regarded as a bank account where the harvest equates to the drawing of interest, the moment the capital is tapped the whole structure will start to unravel.
- 5) Any fishing method or system that needs to draw on the capital to function by depleting stocks beyond sustainability is doomed and morally damned from the start.
- 6) Sensible, competent and equitable regulation must be the cornerstone of all future conservation initiatives for all rather than the present thoroughly discredited regime which has, over time, descended into the realms of madness.
- 7) That the revised Common Fisheries Policy has been an unmitigated social environmental and financial disaster encapsulating badly drafted, destructive and inherently insensitive regulation over an extended time-frame is beyond reasonable dispute.
- 8) This is seen to a large extent to be due to the intransigence of officials, who, being controlled by politicians not always fully on top of their brief, have wilfully persisted with policies that whilst probably well intentioned were non-the-less patently flawed from day one.
- 9) One definition of officialdom states "that it takes a simple issue and makes it complicated", this, to a layman with long practical experience, seems to be true, there has invariably been a mindset of steely administrative inflexibility that has over this period ruled out any form of compromise or willingness to fine tune events to evolving circumstances regardless of demonstrably developing adverse consequences.
- 10) However well intentioned the original concept of the CFP may have been this regime of badly formulated insensitive micro management will invariably foster a sense of injustice resentment and outright hostility by those who suffer as a result of poor policy decisions taken in places remote from unfolding events by poorly briefed politicians and civil servants, this is reinforced by the universal hostility to it, that has resulted.
- 11) Together the European Commission and DEFRA's officials have succeeded in laying waste to fishing communities and infrastructure throughout Europe, wrecking businesses and lives at the heart of these communities in the process, while the economy and environment in these regions has continued to deteriorate at an accelerating pace as desperate people fought to survive the regulatory onslaught.
- 12) At the epicentre of this catastrophe has been the inherently flawed quota system which has led to the dumping of un-quantifiable amounts of fish at sea over the period that quotas have been in force, ostensibly for "conservation" purposes.
- 13) This incredible example of the disastrous consequences of administrators, charged with the regulation of a living resource that will never respect arbitrary lines drawn by politicians pens on maps, being given free rein, was in reality, morally and economically bankrupt from its inception, insofar that it did not and never could conserve a single fish.
- 14) Until recently Brussels has placed great reliance on what has predictably proven to be flawed science that paid scant regard to evidence on the fishing grounds whilst continuing to set ever tighter quotas which have only exacerbated the discard problem to an alarming degree.
- 15) This is especially true in the mixed fisheries prosecuted in the English Channel, Western Approaches and Bristol Channel by vessels from Devon and Cornwall along with those from France, Spain, Belgium and Holland.
- 16) The European Commission in Brussels and DEFRA in English territorial waters, having belatedly woken up to the futility of previous policy currently seem to be exhibiting clear signs of increasing desperation at both National and European level as the latent wrath of citizens, increasingly aware of the folly perpetrated in their names, focuses on the collective failings of those whose stewardship has proven so dire.
- 17) This is clearly the motive behind the unaccustomed willingness of politicians and fisheries administrators to suddenly consult all and sundry on the best way forward in order to hopefully develop a future policy that may actually deliver meaningful improvements to the unfortunate citizens who happen to be affected at grassroots level by such ongoing serial institutional failure.
- 18) Could it be that, finally, increasingly obvious public outrage at discard levels and the perceived ineptitude of fisheries mismanagement in general has registered itself on the collective consciences of those who have failed to deliver sound workable policies to such a degree that both National and European politicians can no longer continue to ignore the outrage that has long been evident had they bothered to listen sooner?
- 19) This is vitally important because the currently failed policy has actually, however unintentionally, abused a priceless natural resource that is a vital source of high quality food which given better more competent stewardship has the ongoing potential to be self sustaining in perpetuity.
- 20) A uniquely bizarre unintended, unforeseen consequence of discards has been that, locally, in Cornwall, when combined with the release of rescued seals from a local sanctuary and tourist attraction being familiarised with humans there has possibly been an evolutionary modification of seal behaviour insofar that seals now associate fishing boats and their gear with a source of free food.
- 21) This strange example of the random consequences of cause and effect may account for the escalating levels of damage to monkfish in particular in the Cornish tangle net fishery directly attributable to seal activity leading to increasing calls for a seal cull, which effectively would be a retrograde step, as a probable direct result of rescued seals becoming humanised and discovering an easy plentiful new food source.
- 22) Vessel decommissioning schemes have at considerable taxpayer cost succeeded in reducing catching capacity only to a limited degree insofar that the incredible level of technology found on relatively small modern "rule beater" vessels that have entered service in recent years ensures that they are super efficient fishing machines.
- 23) Many of these "rule beaters" were built with the money obtained from decommissioning larger vessels at tax payers expense which in reality merely shifted excess catching capacity into another sector with full regulatory consent, currently a proportion of these rule beaters have been decommissioned, again at tax payer expense, why was this fiasco not previously spotted by the army of officials involved?
- 24) Another serious problem that Brussels tinkering has ensured unwittingly is the destruction of an inherently safe seaworthy but relatively inefficient class of vessel in the 15 to 25 metre size bracket only to be replaced by increasing numbers of the less safe but highly efficient under 10 metre "rule-beaters", until recently exempt from the quota system.
- 25) This has transferred massive overcapacity into the inshore fleet which has only recently been subjected to catch recording and quotas set at a level that virtually guarantees financial catastrophe for many, it is even more inappropriate when many of these boats were built with money from older boats previously decommissioned at tax payers expense.
- 26) The recent introduction of catch monitoring and reporting paints a horrifying picture of the actual catching capacity reintroduced when these vessels were constructed to replace previously decommissioned tonnage without let or hindrance from fisheries managers charged with reducing overall catching capacity, effectively a large part of vessel decommissioning was a waste of time and, more significantly, tax-payers money.

- 27) This is a glaring example of the huge financial cost of politicians collective inability to embrace the irrefutable law of cause and effect combined with an unforgivable but not unexpected failure to grasp commercial reality and the sheer entrepreneurial ingenuity that drives it which was virtually guaranteed to create the almost inevitable unwelcome consequences that invariably emerged.
- 28) Once again decommissioning has recently been used as a blunt instrument at considerable taxpayer expense to scrap numbers of under 10 metre vessels (some originally built with grant aid) that would never have been built in the first place were it not for the artificial regulatory distortions and temporary largesse generated by the Common Fisheries Policy.
- 29) Despite this saga of serial ineptitude there still continues to be massive overcapacity in the English under 10 metre inshore fleet particularly in the shellfish sector which has exploded as a result of vessels leaving the whitefish sector because of impossible quota restrictions created by the Common Fisheries Policy.
- 30) This type of artificial vessel displacement from one fishery to another is a typical consequence of administrative meddling in a business that like any other ought, perhaps, to have been regulated by purely economic means.
- 31) Ironically the class of larger vessel decommissioned during the first wave has taken pressure away from the offshore grounds where most used to work, there are now a fraction of the number of vessels be they British French or Spanish offshore than there used to be and this fact is clearly demonstrated by the higher catch rates being reported by remaining vessels as the grounds seem to have rapidly recovered.
- 32) From the steadily improving catch levels experienced by a smaller numbers of larger vessels working offshore beyond the 12 mile limit it seems to suggest that stocks are actually in an increasingly healthy state, this class of vessel generally has access to sufficient quota either owned or leased to ensure discards are minimal or in many cases non existent.
- 33) Problems can still arise when catch levels of certain species suddenly and unexpectedly surge as they often do due to big year classes, better science may soon be able to predict these events and hopefully develop the flexibility to promptly adjust quotas accordingly as necessary.
- 34) Inshore vessels suddenly subjected to catch monitoring and miniscule quotas often report extreme difficulties in avoiding discards if they are to remain fishing in a very mixed fishery, once again a large proportion of blame for this highly undesirable situation lies with the artificial distortions created by the Common Fisheries Policy.
- 35) Political opinion driven by media pressure seems to be edging towards the concept of banning discards in favour of landing everything caught which may give a better more accurate indication of actual stock levels, it has proven to work in Norway and Iceland.
- 36) It ought to be borne in mind by officials that a fish landed iced in a box is no more or less dead than a similar fish merely discarded to become a meal for a semi tame seal or seabird adapting to, and opportunistically exploiting, an unnatural food source.
- 37) One very practical suggestion that has emerged that may bear further scrutiny is that over quota fish landed under such a regime be sold and the income generated used to finance the purchase of additional fish quota by fishermen-owned quota companies such as the already operating Duchy Fish Quota Company based in Newlyn.
- 38) Current trends indicate that marine protected areas (MPA's) designated by Natural England will play an increasing role in future fisheries management and conservation initiatives.
- 39) Marine protected areas that are intelligently identified, accepted by the majority stakeholders, implemented and subsequently properly monitored to ascertain benefits or otherwise are no doubt potentially highly effective conservation and stock management tools if embraced willingly by stakeholders who buy into the concept rather than being arbitrarily imposed as seems increasingly likely.
- 40) When monitoring any designated MPA clear provision must be made to cancel or otherwise fine tune the designation should the original aims and objectives demonstrably fail to be met, any MPA that fails to deliver clearly demonstrable benefits is pointless, unnecessary and financially unsound.
- 41) The advantage of the MPA concept is that, subject to local decision making, it ought to be possible to tailor each one to specific local objectives with conservation as a priority, this need not necessarily entail closing all designated MPA's to all activity or banning everything as some suggest, but rather controlling effort by restricting certain gear types, amounts of gear worked or by implementing seasonal closures as necessary.
- 42) Neither must this mean that a presently perceived bias against mobile gears is intensified, possibly because they are easier to police, while static gear escapes attention because it is more difficult to monitor.
- 43) Experience suggests that seasonal closures appear to have been highly beneficial on the Trevoze grounds off North Cornwall giving credence to the long held, but formerly ignored belief in regulatory circles, that it is logical to protect spawning fish, this is a good example of what a well designated MPA could achieve, it is even more remarkable given that it was introduced on the instigation of fishermen.
- 44) Seasonal closures are particularly relevant in the context of bass and pollack where spawning aggregations of both species in known locations are highly vulnerable to intensive directed fishing effort, be it pair trawling or netting, this madness frequently glut markets with often low quality produce, which quite predictably lowers market prices, so valuable breeding stock is decimated for relatively low returns.
- 45) It is increasingly felt that both species which are the cornerstone of sustainable inshore fishing practices and recreational sea angling would be much better exploited by hook and line fisheries prosecuted by small boats at times when both demand and market prices are high.
- 46) Commercial handline or pole fishing is a highly skilled operation, by its very nature it is entirely self regulating and admirably suited to slot into the MPA concept.
- 47) Dozens of boxes of fish roe often seen on fish markets in the main spawning season are clear evidence of unsustainable and unacceptable fishing practices which further strengthens the case for seasonal closures in defined areas, which again, in reality would fit well with the MPA concept.
- 48) A long standing problem has been the offshore winter pair trawl fishery for bass by targeting spawning aggregations which are highly vulnerable to this method, there have been repeated calls to ban the method, however it is not the actual method that is problematic, rather its timing, perhaps a simple seasonal closure for targeted bass pair trawling in the western channel would be more effective and acceptable.
- 49) From the recreational sea angling perspective the pair trawl fishery appears to have had an impact on the size of bass at sexual maturity, bass were generally accepted to be sexually mature at circa > 42 centimetres but the bulk of the spawning stock were much larger 3 kilo plus fish, in recent years gravid bass of <40 centimetres have been observed with a corresponding decrease in the numbers of bigger fish.
- 50) This will possibly lead to many more bass of a much smaller average size (a race of dwarves?), increasing numbers of much smaller fish is a classic sign of a stock in distress, both recreational sea anglers and commercial handline fishermen have a vested interest in the capture of higher numbers of larger bass which provide better sport and higher financial returns, the small bass market should be supplied by farmed bass.
- 51) Commercial hand liners operating out of small remote Cornish Coves (so called "pole men) are the perfect means of harvesting bass, pollack and mackerel in a low impact manner which produces small catches of superb quality fish in a highly sustainable manner, they encapsulate the tourists vision of Cornish fishermen and are a vital feature of Cornwall's unique coastline, NATURAL ENGLAND PLEASE TAKE NOTE!
- 52) There is also a similar but more extensive artisanal fishery on the Breton Coast operating along similar lines, both fisheries are admirable and must be nurtured and preserved, they are the fisheries most at risk from the activities of the offshore winter pair trawl fishery which is seen as particularly destructive when it targets spawning aggregations of bass in the late winter.
- 53) The monitoring of "O" group juvenile bass in the Fal and Helford Rivers in Cornwall, an ongoing project conducted under licence from DEFRA by the remarkable Captain Derek Goodwin, (an octogenarian human dynamo) tends to suggest two weak year classes which does not bode particularly well for the future.

- 54) Bass nursery areas introduced by MAAF (DEFRA's predecessor) have proven to be highly successful as revealed by Captain Goodwins valuable work over many years, it is good to acknowledge a rare success story with regard to fisheries management
- 55) However as soon as the juvenile bass leave the nursery areas they are highly vulnerable to gill nets inshore, the two weak year classes highlighted by Captain Goodwins netting samples could potentially create a considerable hole in a stock composed of predominantly small fish, given the possibility of a series of poor year classes this could have serious long term consequences for a pressurised resource if not addressed.
- 56) Cornish North Coast storm beaches such as Porthtowan and Perranporth used to be noted for regularly producing significant numbers of bass in the 3 to 4 kilo range for recreational sea anglers.
- 57) In recent years these fish have been virtually absent but have been replaced by high numbers of juvenile fish of barely legal size which were formerly unheard of in these locations.
- 58) The bass stock from a pure numbers perspective is apparently healthy but in reality it is actually quite severely out of balance owing to the worrying absence of the larger class of breeding fish in their normal haunts, replaced by immature bass not formerly present in these locations, this follows more than a decade of significant inshore gill netting activity combined with the targeted winter pair trawl fishery offshore.
- 59) A typical example of (well meaning) but spectacularly inept British fisheries regulation involved the banning of British vessels pair trawling for bass inside 12 miles in an attempt to placate the angling lobby which politicians recognise as significant.
- 60) Unfortunately at the same time the French being in possession of EU rights regulated by Brussels were able to continue fishing into six miles while taking massive catches, despite local boats being excluded.
- 61) The cetacean by catch question that this pair trawl fishery raises at during the winter season ought to be reason enough to seasonally close the fishery as it cannot be pure coincidence that cetacean mortality as evidenced by numerous carcasses washed ashore during this season causes public outrage and strong anti fishing sentiment which is not currently being addressed by the EU.
- 62) Another potentially even more serious problem involves the increasingly active near shore summer gill net fishery for red mullet, the fishery is proving lucrative on the back of increasingly abundant red mullet numbers so more gear is being introduced and more vessels are piling in to take advantage.
- 63) Net soak times can vary, the most successful boats appear to work less gear but turn it over more frequently which hopefully minimises the potentially heavy by catch of small pollack and wrasse.
- 64) Less professional operators working more gear with correspondingly longer soak times to compensate for lower skill levels are probably causing heavy by catch mortality by allowing nets longer soak times while the target species is left highly vulnerable to damage from cuttlefish and crabs which ruin catch quality.
- 65) It is reiterated that there is a perception that boats working offshore using mobile gears get more disproportionate regulatory attention than inshore netters, could this be because they are an easier prey for target driven enforcers?
- 66) Uncontrolled gill netting is probably the most serious threat to close inshore species of interest to recreational sea anglers both shore and boat.
- 67) At present neither UK National or EU regulators have any idea how many kilometres of static gill and tangle nets exist, given that huge amounts probably sit unused in fishermen's stores in addition to what is actually at sea fishing, if this were to be seriously examined the results could prove startling.
- 68) Perhaps some thought ought to be given to licensing sellers of sheet tangle and gill netting throughout the EU with the proviso that all sales are recorded and reported (which would be relatively easy to implement).
- 69) Likewise fishermen ought to be licensed to buy sheet netting (which again is potentially easy to implement) or ready rigged nets so that over a period it would be possible to accurately monitor how much static netting gear of a specific type was in use or available for use by any given individual or vessel.
- 70) It is accepted that, properly used, particularly in the offshore context, gill nets and tangle nets can be a highly selective fuel efficient tool for targeting size specific mature fish with minimal by-catch mortality, however misused (particularly tangle nets) they are an environmental menace that slaughters fish and other creatures in the most destructive unacceptable manner.
- 71) A combination of effort control, after establishing how much gear is actually being used, by setting a ceiling on gear length combined with well structured sensibly implemented MPA's could be a major contribution to conservation without preventing responsible fishermen exploiting opportunities in a responsible professional manner.
- 72) A particular issue arises in Cornwall in relation to small inshore boats able to return easily to port repeatedly to load more gear, bigger offshore netters working trips are, to a degree, limited by the physical amount of gear they can actually carry and the excessive steaming time and fuel involved in returning to port for more gear.
- 73) It is hoped that practical, effective, affordable acoustic devices will soon be available to eliminate or at least keep cetacean by-catch to the absolute minimum in the gill net fishery.
- 74) It is not unreasonable given their financial input to expect that recreational sea anglers can target fish from the shore or boat in the reasonable expectation that they will, given an average degree of competence, have some measure of success in catching what they target.
- 75) In practice this means that they should not have to perpetually run the gauntlet of excessive commercial fishing activity to successfully achieve their objective, this is a prime example of the potential benefits to be gained from an MPA network .
- 76) From the MPA standpoint perhaps serious consideration could be given to establishing hook and line only zones around specific reefs and inshore sandbank systems which would also potentially benefit commercial hand-liners targeting, typically, bass and pollack in a relatively low impact manner, again this sits comfortably with a well structured MPA regime.
- 77) Inshore sandbank areas are often significant flatfish nurseries which can be seriously harmed by continual trawling activity, a prime example is the Skerries Bank in Start Bay which is well protected by a trawling ban and very economically significant for angling charter boats, a similar area in Porthcurno Bay in Cornwall enjoys no protection and therefore never fulfils its true potential as a nursery area.
- 78) There are several other relatively small but nonetheless significant areas which would benefit from some measure of protection for juvenile flatfish particularly turbot which would be much more valuable if allowed to grow bigger before coming under fishing pressure.
- 79) Vessel monitoring already exists on larger vessels, as well as an aid to fisheries monitoring and enforcement its contribution to safety is vital, the ability to instantly establish a vessel's position in a distress situation is priceless.
- 80) Monitoring systems should be introduced across the entire fleet as soon as possible, the technology is available, this would reduce the requirement for expensive patrol vessels enabling enforcement effort to concentrate on identified risks and landing points.
- 81) This is highly relevant in the case of the very small numbers of recreational sea anglers fishing from unlicensed vessels who abuse their position to sell their "by the back door" catches often to the detriment of licensed commercial fishermen.
- 82) This albeit very limited practice eschewed by the vast majority of law abiding anglers is justifiably a major cause of friction and distrust and a potential flashpoint between professional fishermen and recreational sea anglers which is entirely due to the selfish actions of a tiny minority of recreational sea anglers.
- 83) A similar reverse situation can occur when the odd rogue commercial fisherman antagonises anglers by interfering with their legitimate activities, the miscreants on both sides of the divide ought to know better, there are so many legitimate issues of mutual concern, they should be ashamed of themselves and learn to work together.

- 84) Scalloping seems perpetually in the news for all the wrong reasons as Natural England flexes its muscles without apparent thought for the inevitable unhelpful consequences that its unilateral closures inflict on other areas.
- 85) The inshore scallop fleet in Devon and Cornwall is stable and has been for many years, it consists primarily of modern purpose built vessels which represent a major investment in the future by their operators.
- 86) There is no doubt that reef systems need protection, I have campaigned on this issue for over ten years, it should be recognised that scallop gear will be seriously damaged if it is towed over high reefs, the problem of scallop dredge damage really arises on mixed grounds and ross coral banks.
- 87) That said current proposals around Lands End by Natural England have appeared to omit three highly significant reef systems, the Wolf Rock, Carn Base and the Runnelstone while the proposal on the table appears to include a section of prime trawling ground between the Ship (Seven Stones) and the west side of Cape Cornwall Bank.
- 88) The West Country inshore scallop fleet is effectively hemmed in by the presence of large industrial scallop vessels towing up to eighteen dredges per side working in to six miles, the same applies to local static gear vessels unable to risk heavy gear losses to large scallopers when fishing outside the six mile limit.
- 89) Beam trawlers in this six to twelve mile zone have long been limited by horsepower and gear size, why are scallopers exempted?
- 90) If these large vessels were excluded from the six to twelve mile zone the smaller local vessels could expand into the area relieving pressure on inshore grounds all round.
- 91) This could be simply achieved by limiting dredge numbers to eight per side on all sizes of vessels wishing to fish in this zone, why do fisheries administrators appear to repeatedly ignore this glaring anomaly?
- 92) Perhaps a measure of this type could be sweetened for the displaced vessels by restoring the former 10% whitefish by-catch allowance for vessels working more than 8 dredges per side outside the 12 mile limit, this was reduced to 5% to no avail other than increase discard rates of fish not specifically targeted but nonetheless already dead.
- 93) Currently it would appear that potentially more regulators are involved in fisheries monitoring enforcement and research than there are actually full time fishermen to be regulated, Natural England's present exponential growth is almost certainly exacerbating this very serious financial issue generated entirely by ongoing serial regulatory inefficiency.
- 94) It therefore necessarily follows that the combined cost of fisheries regulation enforcement and research is possibly more than the gross financial output of the English fishing industry, if this does turn out to be true it is a totally unacceptable example of "big government" at its worst and a serious misuse of tax payer funds.
- 95) Any system where the regulators potentially outnumber the regulated will invariably be inefficient, inherently unsound and inevitably doomed to ultimate failure, in England Natural England must be factored into this equation.
- 96) The soon to be introduced Inshore Fisheries and Conservation Authorities (IFCA's) must be structured to deliver ongoing meaningful improvements on what presently occurs under the increasingly outmoded Sea Fisheries Committee regime which they are designed to replace, presently this may not be a foregone conclusion given the current level of institutional regulatory failure.
- 97) It necessarily follows that there are currently, almost certainly, too many regulatory layers to deliver maximum regulatory efficiency at minimum tax payer cost even before factoring in what is currently in the pipeline.
- 98) IFCA's are, in theory, an ideal opportunity to introduce a local decision making process that regulates from the bottom up, rather than as presently, from the top down, eliminating the implied inefficiencies the present system delivers to the serious detriment of our precious marine environment, the outcome in practice is awaited with a degree of trepidation as previous experience counsels caution.
- 99) Properly implemented this imminent new regime offers the tantalising prospect of stripping out several layers congenitally inefficient administration that has played a large part in creating the present unacceptable regulatory mess, the localised bottom up regulatory model that, subject to proper safeguards, delegates local control to local agencies better suited to local area management must be the best way forward.
- 100) Under this regulatory model there would need to be provision for regular contact and close liaison with French and Spanish organisations which would hopefully be created by this local-regional management model which would empower the citizens closest to the resource to manage it responsibly and sustainably to the greater benefit of all.
- 101) For this to work politicians would need to accept citizens rights to local and regional self determination within the EU long bitter experience teaches that Brussels is simply not up to the task.
- 102) The sixty four thousand dollar question hinges around the will of both English and EU politicians and civil servants to implement the sea changes in outlook and culture required to deliver the economies necessary to restore the balance between regulator and regulated, which as it stands presently is both unacceptable and unrepresentative.
- 103) Unless or until politicians and officials accept unreservedly that they are ultimately responsible for the catastrophic mess that has occurred on their watch and that any rectification measures devised must involve pain on their part commencing with a declaration of all out war on twaddle and fudge this consultation will be yet another cruelly cynical shambolic attempt to appease and hoodwink citizens by papering over the cracks
- 104) Whatever else transpires it is incumbent on politicians and civil servants to deliver a balanced marine regulatory regime that works fairly, equitably and effectively in whatever form proves necessary to deliver demonstrably better tax payer value than hitherto, if this involves a heavy cull of those responsible for past mistakes then so be it.
- 105) It should be clearly noted that organisations such as Natural England which already seem to be multiplying exponentially on the back of the English Marine Bill are already regarded with great suspicion by a broad cross section at grass roots level on account of their perceived autocratic nature and top down approach, they cannot and will not function effectively without the acceptance of those they will impact most heavily upon.
- 106) There is presently compelling evidence of a serious danger of ongoing duplication of effort and its attendant economic implications which waste scarce monetary resources as various unelected unaccountable QUANGO's hop on the bandwagon created by the English Parliaments Marine Bill.
- 107) Clear evidence of slackness in the system is already apparent, as presently, MPA advisory groups wait for work to be completed, which in reality, ought to have been completed and ready to be utilised before the English Marine Bill gained Royal Assent, this early failure by a well funded QUANGO is bound to impact unfavourably on the function of IFCA's from day one.
- 108) Anecdotal evidence suggests that the (EU funded?) Finding Sanctuary Project has cost tax payers circa £5,000,000 to produce similar work to that has been undertaken by the Cornish Fish Producers Organisation for circa £30,000, yet the Finding Sanctuary work is still overdue and impacting on the work of MPA advisory groups, which currently, In Cornwall, are dead in the water as a result.
- 109) There was a similar project commenced locally in Cornwall, "Identifying Significant Areas", the results of which have never seen the light of day as far as those who contributed their experience and knowledge at grass roots level are concerned, this is a clear illustration of why so many willing voluntary participants are so seriously under-whelmed by the performance standards of those responsible.
- 110) I attended an angling consultation meeting organised by English Nature in Peterborough at the time that English Nature was about to be replaced by Natural England in preparation for the enactment of the English Marine Bill where it was categorically stated that the new organisation would be driven from the bottom up, it was sold to us on that basis, subsequent experience tends to indicate that this is not or will not be the case.

- 111) ALL PUBLIC BODIES, IN WHATEVER FORM THEY TAKE OR AREA THEY OPERATE IN, MUST BE FULLY ACCOUNTABLE AT ALL TIMES, UNLESS THEY ARE THEY MUST NOT BE UNDULY SURPRISED WHEN THEY ENCOUNTER NEGATIVE REACTIONS OR OUTRIGHT HOSTILITY FROM THE CITIZENS THEY WERE CREATED TO SERVE.
- 112) THEY MUST CLEARLY AND DEMONSTRABLY DELIVER BEST VALUE IN A TRANSPARENTLY ECONOMIC MANNER, CONSEQUENTLY THEY MUST STAND OR FALL BY RESULTS ALONE, OUT OF CONTROL, REMOTE, DETACHED, DISPASSIONATE OFFICIALDOM FEEDING ON ITS OWN INEPTITUDE SIMPLY WILL NOT DO.
- 113) WERE THE REGULATORS TO HAVE THE VISION AND COURAGE TO HAND CONTROL OF VITAL MARINE RESOURCES TO THE LOCAL CITIZENS MOST AFFECTED WHO STAND TO GAIN OR LOSE THE MOST FROM SUCCESS OR FAILURE HUGE ECONOMIES WOULD BE VIRTUALLY GUARANTEED, IF THIS FAILED WHICH IS UNTHINKABLE THE SITUATION COULD SCARCELY BE WORSE THAN AT PRESENT.
- 114) IF AS IS HIGHLY LIKELY SUCH EMANCIPATION SUCCEEDED WHERE BUROCRATS PREVIOUSLY FAILED POLITICIANS COULD CLAIM THE CREDIT FOR A STUNNING SUCCESS THAT WOULD DELIVER EVERY RIGHT THINKING CITIZENS VISION OF CLEAN VIBRANT SEAS POPULATED BY HEALTHY ABUNDANT MARINE AND BIRD LIFE.