



Summary of Responses to the Isle of Man Department of Environment, Food and Agriculture (DEFA) Consultation on iVMS requirements for under-12 m fishing vessels

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The activity ran from 01/03/2022 to 11/04/2022

Responses to this survey: **10**

1: Do you agree with the proposal that iVMS is needed on under 12m vessels? agree with the proposal that iVMS is needed

There were 10 responses to this part of the question.

Option	Total	Percent
Yes	10	100.00%
No	0	0.00%
Not Answered	0	0.00%

2: Do you agree that a temporary exemption should be included for vessels under-6 m overall length? agree that a temporary exemption should be included for vessels under-6 m

There were 10 responses to this part of the question.

Option	Total	Percent
Yes	5	50.00%
No	5	50.00%
Not Answered	0	0.00%

3: Do you agree that such an exemption (2) should be subject to a phase-out policy, i.e. non-transferable? exemption should be subject to a phase-out policy

There were 8 responses to this part of the question.

Option	Total	Percent
Yes	4	40.00%
No	4	40.00%
Not Answered	2	20.00%

4: Do you agree that the iVMS statutory provisions should align with the requirements being introduced in English waters?

iVMS statutory provisions should align with the requirements being introduced in English waters

There were 10 responses to this part of the question.

Option	Total	Percent
Yes	7	70.00%
No	3	30.00%
Not Answered	0	0.00%

5: What alternative approaches could be taken to achieve the same aim?

There were 4 written responses to this Question.

Owners of vessels less than 6 m in length overall acknowledged it would be difficult, particularly where there is no cabin on onboard electronics, to securely maintain (and comply with) an iVMS requirement, and recommended that instead, additional reporting requirements could be used to identify spatial extent of activity.

Other suggested that a local solution would be welcomed, considering the relatively low risk of these small vessels.

However, other responses suggested that **if** there is portable, and battery-powered iVMS technology that allows these small vessels to comply with requirements, then there is no reason why there should be an exemption.

On the subject of alignment, some responses suggested that the Island has, in the past, has increased reporting requirements compared to the UK.

6: What are your views on the operating costs, and the impact on businesses?

Please add your comments - views on operating costs and impact on businesses

There were 7 written responses to this Question.

Comments acknowledged the support that is intended to be made available by the Department, and welcomed the approach. The operating costs were, generally, considered to be negligible

compared to other operating costs, and there was significant cost-benefit to be made from investment.

Others noted that, by not covering the installation costs, there may be additional pressure on fishing boats, particularly given that there is a limited supply of electrical engineers on the Island.

Finally, whilst estimated operating costs were estimated to be low, respondents urged caution and consideration against rising costs, as has been the case with VMS devices.

7: What are your views on the potential benefits of iVMS?

There were 7 written responses to this Question.

All responses noted that there are significant benefits to be realised through an iVMS requirement, and that the benefits highlighted by the Department in the consultation document appeared to cover the main areas.

However, responses noted that, at present, iVMS devices only record location and speed, and does not necessarily demonstrate proof of fishing for enforcement purposes.

Finally, some respondents noted the benefit to fishers from the increasing designation of offshore marine developments, such as wind farms, whereby iVMS-enabled vessels will be able to demonstrate their dependence on certain areas of the territorial sea.

8: When should the statutory provisions be scheduled for introduction?

There were 6 written responses to this part of the question.

Half of the respondents called for the Department to introduce the requirements as soon as possible. Others suggested that a minimum 12 week notification period is required.

Other suggested that the Department should only introduce statutory requirements once it is satisfied all vessels have had the opportunity to have devices installed and tested, and that once introduced, a grace-period (with respect to enforcement) should be considered as operators becomes used-to the maintenance and operation of devices.

9: Do you have any other comments in relation to this proposal?

There were 5 responses to this part of the question.

Most respondents urged the Department to build upon this consultation with a delivery / implementation plan.

Others took the opportunity to point out that, as these requirements are introduced, the Department should review the Logbook Regulations to assess whether any other reporting requirements may be removed, so as not to duplicate reporting requirements.

Next Steps

The Department would like to thank all the respondents for their views. The Fisheries Division within DEFA will now work to develop a policy on iVMS, and set out an implementation programme.

The Department has procured the provision of iVMS devices from Succorfish Ltd (SC2 GEN2 devices, Iridium enabled), which will be made available to eligible persons* in the near future. The devices will be made available ahead of any statutory requirements, which may be introduced either through a condition of the Isle of Man sea fishing licence, or through regulation (to be determined).

Officers will continue to work with counterparts in the UK Devolved Administrations to avoid, mitigate, or manage potentially conflicting technical requirements relating to iVMS.

*eligible persons are owners of fishing vessels registered in the Isle of Man, which have an overall length of less than 12 metres.