

CifA response to DEFRA consultation on the introduction of Inshore Vessel Monitoring Systems for all licensed British fishing boats under 12 metres in length operating in English waters

Submitted via online form

Link: <https://consult.defra.gov.uk/marine-management/introduction-of-inshore-vessel-monitoring-systems/consultation/intro/>

Relevant questions and responses:

7. Do you agree with the proposal that I-VMS is needed on under 12m vessels?

Yes.

Adopting I-VMS for under 12m vessels opens up new possibilities for effective monitoring and management of the marine historic environment. Although not mentioned in this consultation, the proposals could help to achieve positive enhancements in protections for important underwater cultural heritage, adding value to the Government's investment in this scheme.

9. What are your views on the costs and benefits as set out in the Regulatory Triage Assessment, do you agree with them?

With the exception of the omission of potential benefits to managing the marine historic environment, we agree with the Regulatory Triage Assessment and particularly emphasise the management of environmental protections in MPAs and other sensitive areas, as these parallel uses of the technology relate to similar potentials for monitoring of underwater cultural heritage.

10. Are there any costs or benefits that have not been identified in the Regulatory Triage Assessment? What evidence do you have to support this?

The consultation document omits reference to the historic marine environment which should be listed as benefit to government and other public sectors. The proposals for I-VMS could enable monitoring and evidencing of small boat activity in relation to heritage assets, such as protected wrecks. Data produced would be of use in showing that fishermen take due care with such assets, closely paralleling how I-VMS could be used for zoned management in MPAs. I-VMS would also likely be useful in discouraging harmful activities and create opportunities to enhance discovery protocols.

It would be extremely valuable for DEFRA to explicitly recognise scope for these benefits at this stage, with details to be fully considered in consultation with specialists in the historic environment in due course. The Chartered Institute for Archaeologists, in particular the CifA Marine Archaeology Group (MAG) – to which most professional maritime archaeologists belong – would be happy to contribute to these discussions to ensure the appropriate inclusion of benefits to the historic marine environment in the proposals.