

# Kent & Essex Inshore Fisheries and Conservation Authority



## Annual Report 2022-2023

[www.kentandessex-ifca.gov.uk](http://www.kentandessex-ifca.gov.uk)

# ***Publication***

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## Contents

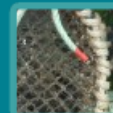
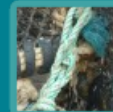
<b>Introduction to IFCA Success Criteria .....</b>	<b>2</b>
<b>Overview .....</b>	<b>3</b>
<b>Chairman’s foreword.....</b>	<b>4</b>
<b>Focus and priorities .....</b>	<b>5</b>
<b>IFCA Vision and Duties.....</b>	<b>6</b>
<b>The Kent and Essex IFCA District.....</b>	<b>7</b>
<b>Success Criterion 1: Communications and Engagement.....</b>	<b>8</b>
<b>Success Criterion 2: Compliance and Enforcement.....</b>	<b>13</b>
<b>Success Criterion 3: Management Measures.....</b>	<b>22</b>
<b>Success Criterion 4: Governance and Training.....</b>	<b>27</b>
<b>Success Criterion 5: Evidence and Science .....</b>	<b>31</b>
<b>Structure of the Authority .....</b>	<b>39</b>
<b>Staff structure.....</b>	<b>42</b>
<b>Resources.....</b>	<b>43</b>
<b>KEIFCA strategically working with partners.....</b>	<b>44</b>
<b>Stakeholder engagement, communication &amp; consultation....</b>	<b>45</b>
<b>Abbreviations.....</b>	<b>46</b>

## Background

The Marine and Coastal Access Act 2009 (MCAA 2009) provides a framework for managing the demands put on our seas, and aims to ensure clean, healthy, safe, productive and biologically diverse oceans and seas, by putting in place better systems for delivering sustainable development of the marine and coastal environment. Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA) and the District for which it has responsibility were established by the Secretary of State under sections 149 and 150 of MCAA 2009 and took on its full statutory role from the 1st April 2011.

The Kent and Essex Inshore Fisheries and Conservation Authority has clearly defined duties to manage fisheries in a sustainable manner and conserve the wider marine environment within the coastal waters of Kent and Essex. This annual report provides information regarding how the Authority has fulfilled its duties and reports on actions taken during this year which contribute towards the Government’s Marine Policy Statement and High Level Marine Objectives.

Although the Marine and Coastal Access Act 2009 provides the outline of change, important detail has been added by the implementation of Orders and Defra guidance documents. These documents include the IFCA vision statement, success criteria and high level objectives, as well as key outputs and performance indicators; these have been used to assist in the development of our priorities as an organisation for 2022-2023 (see [www.kentandessex-ifca.gov.uk](http://www.kentandessex-ifca.gov.uk) for documentation).





## *Introduction to IFCA Success Criteria*

This report summarises the outcomes of the Annual Plan, structured in relation to progress against the five IFCA Success Criteria:

- **Success Criterion 1: Communications and engagement** - IFCA's are recognised and heard, balancing the economic needs of the fishery whilst working in partnership and engaging with stakeholders.
- **Success Criterion 2: Compliance and Enforcement** - IFCA's implement a fair, effective and proportionate enforcement regime.
- **Success Criterion 3: Management measures** - IFCA's use evidence based and appropriate measures to manage the sustainable exploitation of sea fisheries resources and deliver marine environmental protection within their districts.
- **Success Criterion 4: Governance and Training** - IFCA's have appropriate governance in place and staff are trained and professional.
- **Success Criterion 5: Evidence and Science** - IFCA's make the best use of evidence to deliver their objectives.

# Overview— 2022-23 at a glance...

## KEIFCA 2022-2023



Fisheries inspections

**8,457** million  
Estimated cockles in the Thames



**1,845**  
Cockle samples taken



236 km<sup>2</sup>  
of MPAs with protective management measures

**13** staff



567  
Marine mammal sightings



**5,799** miles covered in patrol vessels



29  
Whelk permits issued



**£955 K**  
budget



**18** Authority members



**15** Scientific Dispensations issued



43  
Staff training courses completed



**45**  
Fisheries Offences recorded



247  
Intelligence reports

Twitter followers



**813**





## Foreword

### **Chairman's foreword**

This year's annual report demonstrates the continuing progress of Kent and Essex IFCA as a leading authority. Over the last year there has been a significant focus on the long-term future management of the Thames cockle fishery. A huge amount of effort has been taken in collecting evidence and views from a wide range of stakeholders with a bespoke website created to aid the process and the Authority holding an additional 3 specific cockle management Authority meetings. Throughout this process Authority Members and officers continued to strive to achieve a balance between socio-economic aspects of fishing with those of conservation, in accordance with our vision. Ensuring this approach is at the heart of all we do, has allowed us to collectively develop innovative fisheries solutions that reflect local priorities.

In addition to delivering against National IFCA Objectives & Success Criteria, we recognised the importance of demonstrating how our work helps deliver the new Fisheries Act 2020. Fisheries Management Plans or FMPs provide an opportunity to create long-term sustainable fisheries that will benefit us all. We all care about our local coastal fishing communities and the marine environment they rely on, and the creation of these new plans will provide an opportunity for us all to work together to help shape this future.

I am proud of both the strength and resilience of the KEIFCA staff in response to staffing reductions and changes in national policy (e.g. Fisheries Management Plans, the Government's Environmental Improvement Plan and MPA management targets). With this ever-evolving backdrop, we have continued to promote compliance across our regulated fisheries, support projects like Fish Local and invested in improving and developing our ways of working.

We welcome new Members of the Authority both appointed and elected and are very grateful that several highly experienced appointees have renewed their tenures. I would like to thank all the staff, including our finance and administrative team, as well as all our Authority Members for their support and commitment throughout a very busy year.



A handwritten signature in black ink that reads "John Lamb". The signature is written in a cursive, flowing style.

JOHN LAMB  
KEIFCA Chair

# 2022-23 focus and priorities outlined in the Annual Plan

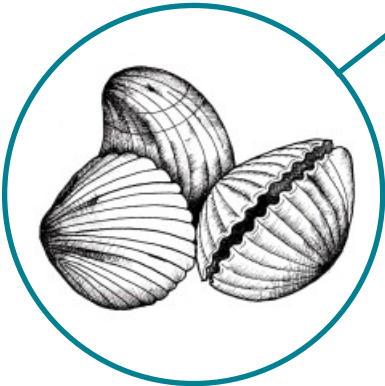
**Working with industry**



**Marine Protected Areas**



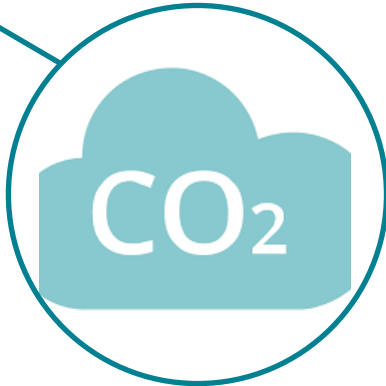
## Focus and Priorities 2022-23



**Thames cockle fishery**



**Future fisheries management**



**CO2 reduction**



## Vision and Duties

### The national IFCA vision

*"Inshore Fisheries and Conservation Authorities will lead, champion and manage a sustainable marine environment and inshore fisheries, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry"*

### **Kent and Essex IFCA** **DUTIES**

#### **Competent and Relevant Authority for transposed directives:**

- The Habitats Directive 1992
- The Water Framework Directive 2000
- The Marine Strategy Framework

#### **Managing local fishery orders:**

- The Thames Estuary Cockle Fishery Order 1994
- The River Roach Oyster Fishery Order 2013.

#### **Duties under Marine and Coastal Access Act 2009**

#### **Section 153. Managing the exploitation of sea fisheries resources in the district:**

- a) Ensure exploitation of resources is sustainable.
- b) Balance social and economic benefits of fishing with environmental protection and recovery.
- c) Take steps to achieve sustainable development.
- d) Balance the different needs of stakeholders.

#### **Section 154. Protection of marine conservation zones:**

- a) Seek to ensure that the conservation objectives of any MCZ in the district are furthered



# The Kent and Essex IFCA District

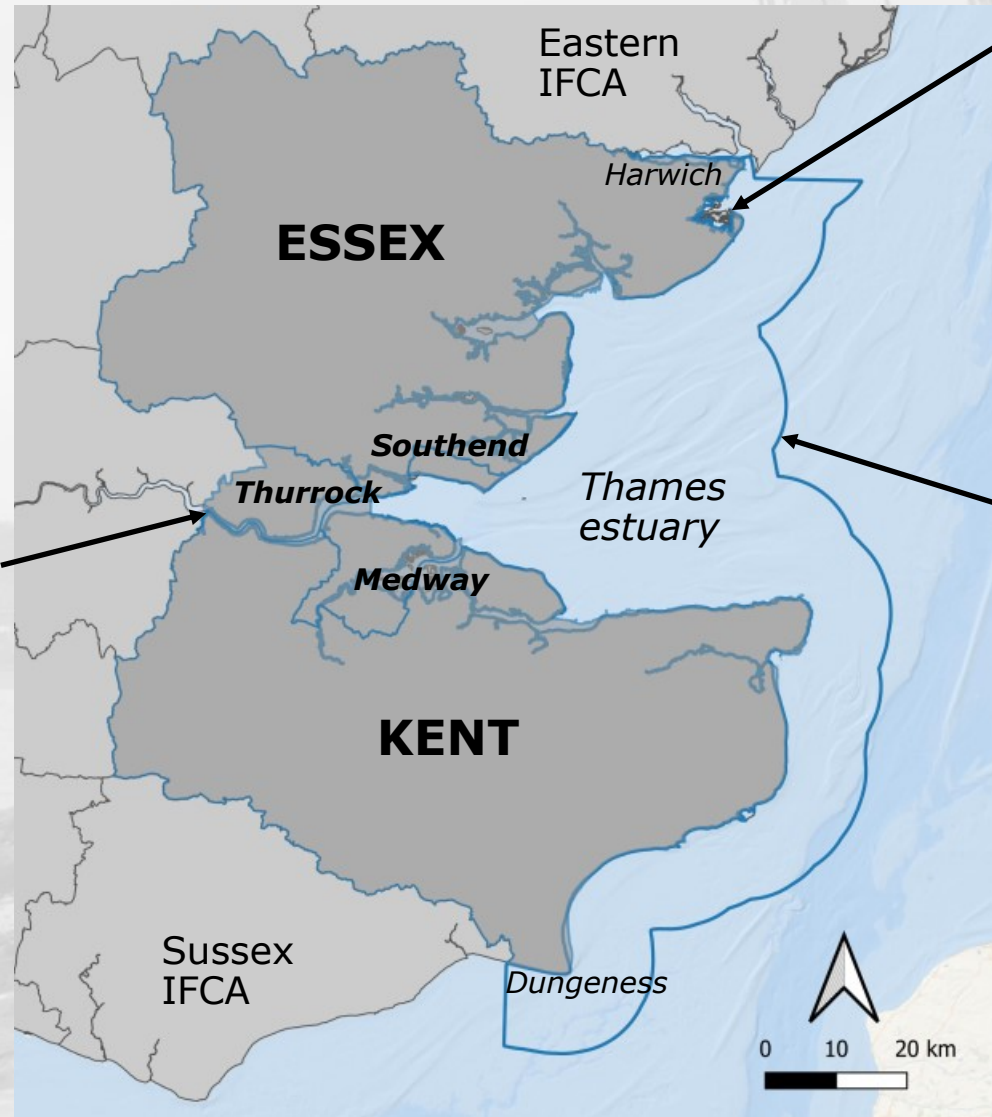
Chart of the KEIFCA district

**The Kent and Essex Inshore Fisheries and Conservation Order 2010 defines the extent of both the landward and seaward elements of the District:**

- the combined areas of the relevant councils (the "basic area" of the district); and
- the sea adjacent to the basic area to a distance of six nautical miles from the 1983 baselines.

## Upstream district boundaries

The up-river KEIFCA boundary in the Thames includes the waters adjacent to Kent County Council and Thurrock Council, with the district boundary running from Dartford creek (River Darent) on the south shore to Mar Dyke on the north shore. District limits for other rivers and estuaries located within the boundaries of Kent and Essex are to their tidal limit (including the Medway, Blackwater, Crouch and Colne).



## Coastline

The coastline of the District is extremely varied, including the reported 'longest coastline of any county' in Essex with its creeks and rivers, to the open Channel coast and chalk cliffs of South Kent, stretching approximately 800km.

## Seaward district boundaries

Kent & Essex IFCA district covers an area of over 3,379 km<sup>2</sup>, and extends from the east end of Rye Bay in Kent to the northern boundary of Essex on the River Stour. The seaward boundary follows the 6 mile nautical limit measured from the 1983 baseline, which, due to drying sand banks, extends up to 15 miles offshore at its furthest point.



# Success Criterion 1: Communications and Engagement

## Working with the community to develop future cockle management

At the November 2021 Authority meeting KEIFCA members agreed the framework to review and develop future cockle management in the KEIFCA district with the aim of confirming new legislation before the current legislation ends in September 2024. As this was such a large piece of work, the task was split into a series of time defined steps (The Listening Phase followed by Consultations 1-4) with each step building on the last. From the outset of this process, KEIFCA defined the scope, purpose, and meeting dates for each step/ consultation, with the aim of setting out a clear process, run over 20 months, that helped everyone understand when, where and what could be decided at each stage.

To best capture feedback from stakeholders, a bespoke engagement process was developed which allowed stakeholders to provide evidence either through a specific questionnaire and/or via filmed oral evidence. KEIFCA officers worked with a local communications company to develop the option of giving filmed oral evidence, and although unusual, it allowed stakeholders to give evidence directly to Authority Members and meant we could include the views of stakeholders that were less confident in giving written answers.

Another key component of the communication plan was to use the KEIFCA e-bulletin to help specifically promote engagement in this process. Normally the e-bulletin is used to promote KEIFCA quarterly meetings and is linked to the publication of papers a week prior to each meeting. With over 150 subscribers, the e-bulletin helps create a regular link to stakeholders and encourages involvement by referring recipients to the website. KEIFCA repurposed the e-bulletin to inform the wide group of stakeholders about the process and how to engage. KEIFCA also worked with Thames Estuary Partnership to engage with the wider stakeholder community especially in the initial 'Listening Phase'.

To underpin the whole cockle management review process KEIFCA constructed a bespoke website to help provide a focal point for information about the process as well as provided a location for key documents and videos to be viewed or downloaded. The website was designed so that all stakeholders would be a few clicks away from accessing all the evidence considered in the decision-making process and officers engaged with the local community to promote the website, using specially designed business cards and posters. Stakeholders providing filmed oral evidence had the option of storing their evidence on the website or submitting their evidence directly to the Authority members on a memory stick. At each step, we held public Authority meetings that were supported by easily accessible and promoted papers that reviewed feedback and options. The additional three special Authority meetings provided a route for all stakeholders to engage with the decision-making process and for KEIFCA members to hear evidence from stakeholders.



# Success Criterion 1: Communications and Engagement

Over the five separate consultations nearly 10,000 pieces of evidence were submitted to or collected by KEIFCA. This evidence included written responses to questionnaires, letters, oral evidence, and one-to-one discussions with officers. A huge amount of work has been put into this review by the fishing industry and other stakeholders as well as KEIFCA Officers and most especially KEIFCA Authority Members without whose commitment and time we would not have been able to run such a comprehensive review process.



<p><b>Consultation 1</b></p> <p><i>Agree initial framework model outlines</i></p> <p>(24 March – 9 May 2022)</p>	<p>The first step reviewed and evaluated a range of different management framework models for managing cockle fisheries within the KEIFCA district. The key features included the size and shape of any specific management zones, the type of fishing gear (e.g. suction dredge or other fishing method), whether access to a zone would be limited and if so to what kind of number/ range of licences or permits would likely be issued. Finally, whether the IFCA would use a Regulating Order or byelaw to manage the area.</p> <p>Following an extensive consultation and a special Authority meeting, the Authority voted for three framework models to be developed further in Consultation 2; New Jamaica, New Haiti and New Bermuda (all these options included a commitment to make a new Regulating Order). The Authority also agreed to develop a small-scale fishery in the area outside the Regulating Order, using the current flexible permit byelaw rather than running a small-scale trial.</p>
<p><b>Consultation 2</b></p> <p><i>Agree access arrangements for framework models and a single framework to take to next stage</i></p> <p>(22 July – 16 Sept 2022)</p>	<p>Consultation 2 explored the different methods, systems, or criteria that the Authority might use to manage, limit or control access to a specific cockle management zone. Building on the decisions made in Consultation 1, the wide range of different possible access arrangements or criteria for potential licence holders were thoroughly discussed and evaluated within the context of each agreed framework model.</p> <p>This is a complex legal area with very far-reaching long-term consequences which can not only impact current fishermen, but also has the potential to impact a generation of future fishermen. The Listening Phase highlighted that this was an area poorly understood by fishers outside of the current cockle fishery and it was important to spend time to clearly work through the mechanisms, outcomes and impacts upon different sectors, of different possible access arrangements. At the end of this step in the process the Authority agreed the final framework model and access arrangements/ criteria to develop further during the technical development phase.</p>
<p><b>Consultation 3</b></p> <p><i>Agree key features and detail of the agreed framework model.</i></p> <p>(12 Dec 22 – 27 Jan 2023)</p>	<p>One of the key issues that has been raised throughout the Listening Phase is whether operators that acquire a licence could transfer that licence in the future either to an individual like a family member or via the purchase of their company. Having a clear management framework model with agreed access arrangements/ criteria will help inform this decision and allow a focused debate on what can be a very emotive discussion with very strong views on either side.</p> <p>Other important areas of detail that would need to be discussed and agreed include the fine detail concerning the review of the legislation, the access arrangements/ criteria and finalising the Regulating Order boundary with specific coordinates.</p>

Will Wright, Chief Officer

# Success Criterion 1: Communications and Engagement



Michael Meddle - TECFO

Michael Meddle

Watch later Share

Entire interview

James Bates - TECFO

James Bates

Watch later Share

Entire interview

Wayne Brewster - CFFPB (Permit Fishery)

Wayne Brewster

Watch later Share

Entire interview



Kevin Castro - Other - Catching Sector

Kevin Castro

Watch later Share

Entire interview

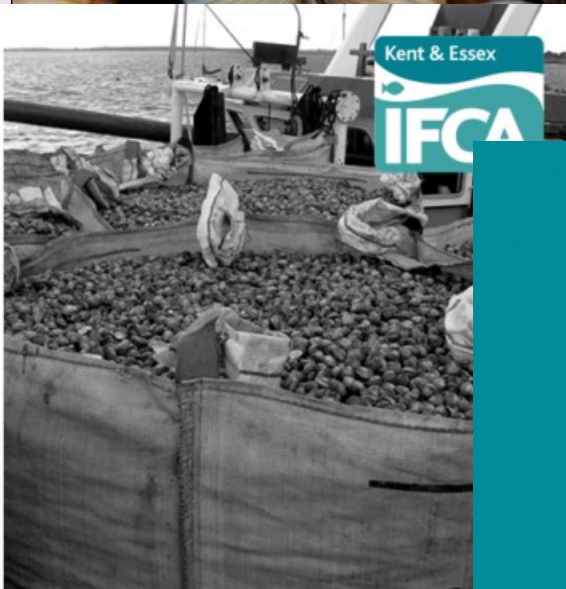


# Success Criterion 1: Communications and Engagement

[cocklereview.kentandessex-ifca.gov.uk](http://cocklereview.kentandessex-ifca.gov.uk)



Consultation process for reviewing and developing future cockle management



Review of current management, and development of future management, related to the cockle fisheries within the Kent and Essex IFCA District.

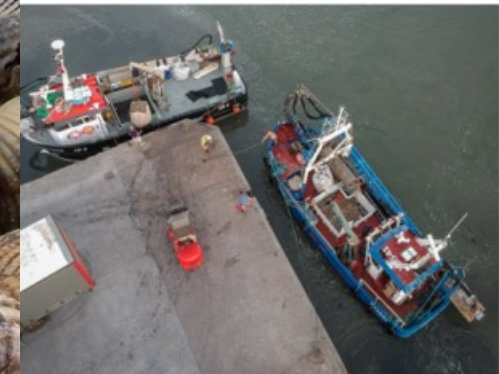
**CONSULTATION 2**



Review of current management, and development of future management, related to the cockle fisheries within the Kent and Essex IFCA District

**CONSULTATION 1**

[http://cocklereview.kentandessex-ifca.gov.uk/](http://http://cocklereview.kentandessex-ifca.gov.uk/)



Review of current management, and development of future management, related to the cockle fisheries within the Kent and Essex IFCA District.

**CONSULTATION 3**



## Success Criterion 1 – Outputs

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION:</b> 1A) Association of IFCAAs – working to coordinate national IFCAAs policy and approach		<ul style="list-style-type: none"> <li>• Contributed financially to the funding of the AIFCA</li> <li>• Attended 3 AIFCA meetings and took forward meeting actions</li> <li>• CIFCO sits on AIFCA as a Director</li> <li>• Chair of KEIFCA sits as a member of AIFCA</li> <li>• Fed into AIFCA annual plan and report</li> </ul>	
<b>ONGOING ACTION:</b> 1B) National Inshore Marine Enforcement Group (NIMEG) – working to coordinate IFCA and partner organisation compliance activities.		<ul style="list-style-type: none"> <li>• Attended 4 meetings and took forward meeting actions</li> <li>• Contributed to the running of NIMEG in officer time.</li> </ul>	
<b>ONGOING ACTION:</b> 1C) Technical Advisory Group (TAG) – working to provide technical input and advice to the Chief Officers Group (COG) and provide direction on national fisheries and marine science for IFCAAs and partner organisations.		<ul style="list-style-type: none"> <li>• Attended 4 meetings</li> <li>• Contributed to the running of TAG in officer time</li> <li>• Fed into the annual report to COG</li> </ul>	
<b>ONGOING ACTION:</b> 1D) External Meetings - Partnership coordination; attend meetings with national partners (MMO, NE, CEFAS, EA, other IFCAAs). Meetings primarily focusing on national policy. (SHARED OBJECTIVE: MMO)		<ul style="list-style-type: none"> <li>• 21 Fisheries Management Plan meetings</li> <li>• 10 Chief Officers Group meetings</li> <li>• 7 Natural England meetings</li> <li>• 9 MAFCO meetings</li> </ul>	
<b>ONGOING ACTION:</b> 1E) Consultations/ Correspondence - replies to national partners e.g. MMO licences, policy consultation on legislation, information requests asking for KEIFCA stats for national purposes.		<ul style="list-style-type: none"> <li>• 25 consultations processed</li> <li>• Local and national information requests and replies processed</li> </ul>	
<b>ONGOING ACTION:</b> 1F) Stakeholder database		<ul style="list-style-type: none"> <li>• Maintained an up-to-date list of addressed and email addresses of stakeholders, updated every 12 months</li> </ul>	





Objective completed



Significant progress made but objective not completed



Minimal progress made

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION:</b> 1G) Website and e-bulletin		<ul style="list-style-type: none"> <li>•The website has been regularly updated with Quarterly meeting papers, before meetings so that the community can be briefed before the Authority meeting. Decisions made by Members are added within 1 week of each meeting to the papers.</li> <li>• The ebulletin has been reviewed to include more content relating to the work of bodies that work in association with the IFCA</li> </ul>	
<b>ONGOING ACTION:</b> 1H) Website content		<ul style="list-style-type: none"> <li>• New website developed to ensure aims of consultation process for the review of the cockle fishery within Kent &amp; Essex are clear and transparent</li> </ul>	Further updates to website required to improve accessibility
<b>ONGOING ACTION:</b> 1K) Tranche 3 Marine Conservation Zones		<ul style="list-style-type: none"> <li>• Coordinate with partner organisations to communicate introduction of T3 MCZs (Goodwin Sands).</li> </ul>	in process
<b>ONGOING ACTION:</b> 1L) New UK-EU relationship - Working through Association of IFCA's with Defra and partners		<ul style="list-style-type: none"> <li>• Attendance at meetings relating to UK-EU relationship through Association</li> <li>• Contribution of local knowledge and experience to national planning</li> <li>• Use of Authority meetings and comms network to update stakeholders on developments</li> </ul>	
<b>ONGOING ACTION:</b> 1M) Communication Plan		<ul style="list-style-type: none"> <li>• Communication plan is produced each year and contained within the Annual Plan.</li> </ul>	



## Success Criterion 2: Compliance and Enforcement

### **Compliance and Enforcement Introduction**

KEIFCA has a statutory duty to manage the sustainable exploitation of sea fisheries resources in our District. In order to do this we aim to maintain an effective enforcement presence around the coast at all times, carrying out patrols, conducting inspections of people undertaking relevant fishing activities to check for compliance with the legislation we enforce.

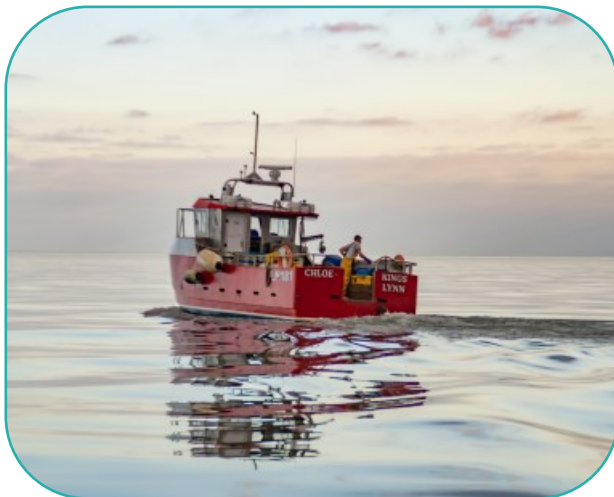
As ever, we maintain a risk-based approach to enforcement, using the best available intelligence to target those individuals who are likely to be operating illegally, thereby making our operations as efficient as possible. We share key information and carry out joint working with partner agencies such as the MMO, Environment Agency, Local Authorities, Border Force and the Police in order to support their objectives and receive support for our own in return.

During 2022-23, significant shifts occurred within our staff structure. Notably, two experienced officers departed from their positions in Essex, and roles within the enforcement team in Kent were restructured. Despite these changes, our officers maintained all enforcement operations, albeit operating at a slightly reduced capacity compared to the previous year. The data for 2022-23 shows a decrease in detected offences compared to the previous year, and this was notably due to great improvements in compliance within the Thames cockle fishery.

To mitigate the effects of reduced officer availability during this period, efforts were made to strengthen collaborative work with joint agency enforcement. Partnerships were cultivated with key partners such as the Marine Management Organisation, Police, and the Environment Agency. As part of these initiatives, one of our officers engaged in joint fishery inspections aboard the MMO Offshore Patrol Vessel "Trafalgar" for a week, fostering increased cooperation and the sharing of enforcement practices.

Training has also improved this year, with a marked increase in the number of training courses attended by officers as the last impacts of COVID restrictions were finally left behind. Organising more training of officers will remain a priority in the coming year compensating for the time that was lost during the pandemic.

*Hayden Hurst, Lead Compliance Officer*





## Success Criterion 2: Enforcement at a glance...

### Enforcement 2022/23

Number of shore patrols



**137**

Gear sightings



**359**

Fishing vessel sightings



**2931**

Nautical miles  
patrolled



FPV Nerissa

**1258**

Nautical miles  
patrolled

FPV Tamesis



**63**

Vessel inspections at sea



**39**

Gear  
inspections



Intelligence  
reports  
processed

**247**



**45** Offences  
recorded



**182**

Inspections in port

**1610**  
Nautical miles  
patrolled

FPV Vigilant





## Success Criterion 2: Compliance and Enforcement Report

### **Bass compliance - joint agency operations**

European seabass is a predatory, slow growing fish that is identified by its sparkling silver scales and spiny dorsal fin. Bass mature slowly and spend their first few years of life in estuaries such as those found in the Kent and Essex IFCA district. Bass then migrate between offshore breeding grounds and coastal spawning locations and eventually reach sexual maturity around the age of six or seven.

Seabass stocks remain in recovery after scientific analysis found populations were being severely impacted by unsustainable fishing mortality. Despite reports of bass stocks recovering well in British waters, there are still recovery measures in place. Commercial fishers are subject to catch limits and can only retain bass with permitted gear types, whilst recreational anglers are restricted to a bag limit of 2 bass per day.

Seabass is an important species in the Kent and Essex district for both commercial and recreational fishers. It is a popular fish to eat which brings high market value for the inshore fleet, and it is also a favourite amongst the angling community who enjoy its fighting abilities. This popularity inevitably attracts compliance risks, and KEIFCA area aware of a minority of people in both commercial and recreational sectors that have continued fish in breach of bass regulations. However, the compliance picture does appear to be improving.

In 2022 – 2023, several KEIFCA patrols observed vessels which had previously operated using illegal drifting gill nets for bass using fixed (anchored) nets instead. This meant they were able to legally retain bass from the nets and would not risk having to return valuable fish to sea. KEIFCA's persistent patrol presence on bass fishing grounds has likely been a strong contributing factor to this positive change in compliance.

Drift netting is a highly effective and targeted method of catching bass and can remove large quantities of prime bass over just a few hours fishing, potentially impacting the recovery of the stock. KEIFCA have continued to run regular sea going patrols to target drifting hotspots in order to work towards improved compliance.





## Success Criterion 2: Compliance and Enforcement Report

The powers for bass enforcement are shared between IFCA and the Marine Management Organisation and as such, joint working is paramount to run effective enforcement operations. In 2021 -2022, KEIFCA and the MMO joined enforcement effort to combat suspected misallocation of fish from one registered fishing vessel to another much smaller registered vessel with bass allocation. The joint operations led to investigations which continued in to 2022-2023, but additional outcomes were seen with several of the fishers suspected of misallocation selling their small bass boats in response to the targeted operation. The sale of these secondary boats eliminated the risk of misallocating bass, allowing the joint work to focus on other compliance issues.

In 2022-2023 KEIFCA and the MMO gathered intelligence to indicate that a commercial vessel was catching and retaining seabass without any authorisation. A directed operation was initiated to investigate the vessel of interest and a merchant suspected of allocating the illegally caught bass to other vessels. The resulting inspection led to an ongoing MMO investigation and is a good example of how the two agencies can work effectively together, sharing resources and information. Although the outcomes of the investigation are still pending, the unauthorised bass fishing and misallocation of catches has ceased.

The overall picture of bas compliance in 2022 - 2023 is positive. Compliance has improved, risk has decreased, and the MMO and KEIFCA's relationship continues to strengthen through positive communication and joint working.

*Alice Highton, First Mate (Essex)*



## Success Criterion 2 – Outputs

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION:</b> 2A) National updates and strategy		<ul style="list-style-type: none"> <li>Data , risk register and enforcement processes reviewed and improved.</li> <li>COVID protocols removed in line with government advice and direction.</li> <li>National Inshore Marine Enforcement Group meetings attended and contributed to by enforcement managers to develop national best practises.</li> <li>KEIFCA LCO sits on Task &amp; Finish groups within NIMEG for investigations, C&amp;E strategy and FAP development. Task and finish groups working to overhaul FAP guidance to improve, streamline and align between MMO and IFCAs.</li> </ul>	
<b>ONGOING ACTION:</b> 2B) Information and Planning		<ul style="list-style-type: none"> <li>x2 Full operation orders implemented to target enforcement on high risk seasonal fisheries (cockles and bass)</li> <li>Tasking and Coordination Group (TCG) meetings held on biweekly basis to focus resources on high risk intel. Increased attendance at TCG meetings from partner agencies including Environment Agency, Border Force, and MMO. Increased emphasis on filling intelligence gaps based on the number of reports submitted from each of the six district areas.</li> <li>TCG charts continued and improved, used effectively for enforcement outcome review and taskings.</li> <li>Annual plans and reports completed.</li> </ul>	
<b>ONGOING ACTION:</b> 2C) Enforcement systems		<ul style="list-style-type: none"> <li>Intel: 247 intelligence reports processed. Training given to officers on a individual needs basis to foster best practise and improve standards. Relevant intel for partner agencies gathered and disseminated. Improved reporting/awareness of intel between partner agencies relating via attendance at TCG meetings and secured KEIFCA access to national (MMO) intelligence database via NIMEG.</li> <li>TCG content updated: inclusion of dispensations active and national vessel of interest lists.</li> <li>MCSS: all inspection, sighting, patrol and offence data (PFV) submitted to MCSS. KEIFCA has one of the highest reporting rates of all 10 IFCAs as reported by MMO via NIMEG.</li> <li>COVID sitreps and response groups discontinued as no longer required, in line with government advice and subject to review.</li> <li>Enforcement SharePoint site used on a daily basis by officers. "Enforcement Record System" used to record all inspection data, vessel ID monitored and maintained by a duty officer in each county.</li> <li>Case file management system implemented following national model.</li> <li>Patrol planning system updated and streamlined, now in use on daily basis by officers in the field. Reporting on outputs has improved and become easier as a result.</li> <li>KEIFCA Crib books reviewed, updated and expanded to include sections on private grounds to improve officer understanding and knowledge in the field.</li> </ul>	Adopt new CLUE intel system when released
<b>ONGOING ACTION:</b> 2D) Case Files and Prosecutions		<ul style="list-style-type: none"> <li>Case files built and proportionate outcomes delivered according to legal advice in line with Compliance and Enforcement Strategy.</li> <li>National protocol and best practises adopted via NIMEG.</li> <li>X3 FAPs issued and paid. X6 official written warnings issued.</li> <li>Officers attended Competent Officer course (x2) and Investigative Interviewing (x4). On-the-job training and feedback from supervision of LCO given to officers routinely when building case files and gathering evidence.</li> </ul>	Further formal training required to improve and maintain officers skills

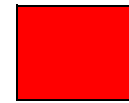




Objective completed



Significant progress made but objective not completed



Minimal progress made

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION: 2E)</b> Sea-going enforcement asset management		<ul style="list-style-type: none"> <li>• KEIFCA vessels maintained for enforcement purposes, including full refit of FPV Tamesis.</li> <li>• Enforcement equipment maintained. BWV cameras upgraded to Halo system, proven to be more robust and reliable. New gauges purchased for byelaw enforcement.</li> <li>• Reports on vessel operation delivered to the Authority.</li> </ul>	
<b>ONGOING ACTION: 2F)</b> Enforcement activities – sea-based		<ul style="list-style-type: none"> <li>• 138 sea patrols: 63 fishing vessel inspections and 39 gear inspections completed.</li> <li>• Improved and updated understanding of partner agency intelligence interests from attending joint meetings and external TCGs.</li> <li>• Intel gathered and compliance risk prioritised and actioned via TCG and Operation Orders, in addition to reactive enforcement to live Intelligence when needed.</li> <li>• Body Worn Video used routinely for inspections at sea and footage used as evidence in case files.</li> <li>• Support MMO / joint taskings by carrying out joint operations to target bass drift netting, and sending IFCO aboard MMO offshore patrol vessel for 1 week.</li> </ul>	Further joint agency sea patrol work
<b>ONGOING ACTION: 2H)</b> Enforcement activities – shore-based		<ul style="list-style-type: none"> <li>• 251 shore patrols and 182 shore-based inspections completed</li> <li>• Intel gathered and compliance risk prioritised and actioned via TCG and Operation Orders in addition to reactive enforcement to live Intelligence when needed.</li> <li>• Body Worn Video used routinely for inspections on shore, footage used as evidence in case files.</li> </ul>	
<b>ONGOING ACTION: 2I)</b> Enforcement training		<ul style="list-style-type: none"> <li>• Updates to legislation and procedures disseminated to officers by ACIFCO and LCO accordingly</li> <li>• CRIB books issued to all officers, content under continuous review. CRIBs are used by officers in the field on a routine basis for specific needs and to maintain knowledge of legislation and procedure.</li> <li>• Personal development opportunities for IFCO working aboard MMO Offshore Patrol Vessel</li> <li>• Operational training package encompassed by CRIB books and subject to continuous review. Aim to train new staff and standardise/optimize experienced staff skillsets.</li> <li>• Admin assistant is trained in data extraction and data processing required for TCG charts</li> <li>• Officers are cross-warranted with the Environment Agency (limited SAFFA warrants. Also 7 EA staff cross-warranted to enforce KEIFCA byelaws.</li> </ul>	
2J) AIFCA National Training Project		<ul style="list-style-type: none"> <li>• KEIFCA led the development and delivery of the IFCO Competent Officer course in Jan-Feb 2023.</li> </ul>	
2K) Marine Protected Area enforcement		<ul style="list-style-type: none"> <li>• MPAs feature in risk register</li> <li>• Enforcement operations detected one minor MPA infringement, verbal warning issued.</li> <li>• MCSS updated where applicable</li> </ul>	
2L) Private grounds		<ul style="list-style-type: none"> <li>• GIS maps created for all private grounds in the KEIFCA district.</li> <li>• New section added to officer CRIB books to ensure all staff are informed of these areas.</li> </ul>	
2M) Dispensations from KEIFCA byelaws		<ul style="list-style-type: none"> <li>• 15 dispensations were provided from KEIFCA Byelaws for survey and scientific study, including CEFAS surveys, University of Essex, Environment Agency, Harwich Haven Authority and Maldon Council among others.</li> <li>• Alteration made to dispensations to reduce impact on sensitive protected areas.</li> </ul>	



## Success Criterion 3: Management Measures

### Replacement of TECFO 1994

Under the Marine and Coastal Access Act 2009, Kent & Essex Inshore Fisheries and Conservation Authority (KEIFCA) has the responsibility to manage the exploitation of sea fisheries resources in our District. In addition, we have a duty to seek to balance the social and economic benefits of exploiting the sea fisheries resources of the district with the need to protect the marine environment from, or promote its recovery from, the exploits of such exploitation.

The Thames estuary sustains some of the largest populations and fisheries of cockles (*Cerastoderma edule*) in the UK and directly supports jobs and skills in our local communities. The main current management system, the Thames Estuary Cockle Fishery Order 1994, is due to end in 2024.

During 2022/23, KEIFCA carried out three of four consultations to define and construct the future management mechanisms of the fishery.

Consultation 1 reviewed and evaluated a range of basic framework models including:

1. The size and shape of any specific management area
2. The type of fishing gear
3. Whether access to an area would be limited and if so to what kind of number/range of licences or permit would likely be issued
4. Whether the IFCA would use a Regulating Order or Byelaw to manage the area

Consultation 2 looked to explore the different methods, systems or criteria that the IFCA might use to manage, limit or control access to a specific management area. Building on the decisions made in Consultation 1 the wide range of different possible access arrangements or criteria for potential permit or licence holders were discussed and evaluated within the context of each agreed framework model. At the end of this step of the process the IFCA agreed the final framework model and access arrangements/criteria to develop further and take into the technical development phase

Consultation 3 addressed a key issue raised in the Listening Phase—whether operators that acquire a licence can transfer that licence in the future to an individual such as a family member or via the purchase of their company. Having a clear management framework model with agreed access arrangements/criteria helped inform this decision and allowed a focussed debate. Other important areas of detail that were discussed included the fine detail concerning the review of the legislation, the access arrangements/criteria and finalising the regulating order boundary with specific coordinates.

The three consultations as detailed above, led to the development of indicative legal wording of the regulating order as well as a management plan. The plan is to then consult on these documents in 2023/24 and apply to Defra for a new regulating order—Thames Estuary Cockle Fishery Order 2024 (T24).

*Dominic Bailey, Assistant Chief Officer*



# Success Criterion 3: Management Measures





## Success Criterion 3 – Outputs

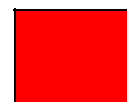
Action	Completion Status	Outputs Completed	Next steps
<p><b>ONGOING ACTION:</b> 3A) Cockle and Whelk Administration e.g. producing, collating &amp; sending out licence info &amp; licences, and permits. Arranging and managing cockle industry meetings</p>		<ul style="list-style-type: none"> <li>• Processed 28 cockle permits and 14 licence applications</li> <li>• Produced 5 cockle fishery update letters</li> <li>• Held industry meetings to discuss management measures for cockle fishery</li> <li>• Processed 28 whelk permit applications</li> <li>• Produced 3 whelk fishery update letters</li> </ul>	
<p><b>ONGOING ACTION:</b> 3B) Byelaw Administration E.g. Arranging advertising, managing the byelaw process, seeking legal opinion etc</p>		<ul style="list-style-type: none"> <li>• Continued to maintain communications with the MMO Byelaw team in order to inform national resource allocation for progression of IFCA byelaws.</li> <li>• Engaged with the MMO byelaw team to provide advance notification of upcoming byelaws in early development by KEIFCA</li> </ul>	
<p><b>3C) Cockle fisheries review of current management</b></p>		<ul style="list-style-type: none"> <li>• Developed and created a consultation document and supporting information for the purposes of running Consultation 1 of the review into cockle fishery management within the KEIFCA district.</li> <li>• Developed and created a consultation document and supporting information for the purposes of running Consultation 2 of the review into cockle fishery management within the KEIFCA district.</li> <li>• Developed and created a consultation document and supporting information for the purposes of running Consultation 3 of the review into cockle fishery management within the KEIFCA district.</li> <li>• Engaged services of Band Agency to carry out oral evidence project for consultations to help stakeholders input their views to the process in a way other than the traditional survey-type format used by most regulators. Oral evidence project was then integrated into the purpose-built website, established for the cockle review.</li> <li>• Held 3 extraordinary Authority meetings to enable members to make decisions in a timely manner to meet the objectives and timescales necessary for successful delivery of the project.</li> </ul>	



Objective completed



Significant progress made but objective not completed



Minimal progress made



Action	Completion Status	Outputs Completed	Next steps
<b>3D) Cockle fisheries development of future management</b>		<ul style="list-style-type: none"> <li>• Blackwater, Crouch, Roach and Colne Estuaries MCZ Native Oyster byelaw in force.</li> <li>• Data collection did not occur due to annual survey not taking place under COVID restrictions</li> <li>• Process in place to discuss fishery opening with stakeholders including industry, Natural England, NGO's and other stakeholders.</li> </ul>	
<b>3E) Future fisheries management</b> - Contribution and engagement to future international fisheries management arrangements which will be key in constantly reviewing our suite of byelaws		<ul style="list-style-type: none"> <li>• Commencement of discussion and consultation process with stakeholders and Members on the review of the cockle fisheries within the Kent and Essex district. Listening Phase, oral evidence session and Member workshop held.</li> </ul>	
<b>3F) Fish Local</b>		<ul style="list-style-type: none"> <li>• Worked with Thames Estuary Partnership to obtain funding from London Gateway develop the Fish Local project and build a stronger local market for fish.</li> <li>• Assisted with bid from Seafood and Fisheries Fund to help support and grow the project</li> <li>• Members of Fish Local presented to Members on work undertaken at IFCA meetings</li> </ul>	
<b>3G) Native oyster management in BCRC</b>		<ul style="list-style-type: none"> <li>• Blackwater, Crouch, Roach and Colne Estuaries MCZ Native Oyster byelaw in force.</li> <li>• Data collection did not occur due to annual survey not taking place under COVID restrictions</li> <li>• Process in place to discuss fishery opening with stakeholders including industry, Natural England, NGO's and other stakeholders.</li> </ul>	'Commercial Fishing Assessment' process not yet established—carry into next Annual Plan
<b>3H) T3 MPA assessment and management</b> – addition of T3 MCZ sites to current legislation		<ul style="list-style-type: none"> <li>• T3 MCZ fisheries assessments completed</li> <li>• Worked with local stakeholders to develop management options for Goodwin Sands site.</li> <li>• Discussions with MMO and NE held about joint site management.</li> </ul>	

## Success Criterion 4: Governance and Training

### **National training update**

With the departure of the National Lead Training Officer and a review of how IFCA training is being delivered moving forwards, Kent and Essex IFCA, together with Southern IFCA, delivered the IFCA Competent Officer course in Torquay in February 2023. This was led by the Assistant Chief IFCO, together with the Deputy Chief IFCO from Southern IFCA. Feedback from the course was excellent and further conversations are now ongoing through the Chief Officers Group to introduce a medium/long term plan

### **Kent and Essex IFCA training update**

Kent & Essex IFCA continues to invest in training its staff to enhance the skills and knowledge of its employees to increase their productivity and efficiency in their respective roles. Investment in training programs for Inshore Fisheries and Conservation Officers is vital in ensuring the competent and effective enforcement of regulations and the sustainable management of marine resources. By equipping officers with the necessary skills and knowledge, we can significantly contribute to the protection of our seas and the conservation of marine life.

#### *Enforcement training*

During 2022/23 selected officers attended the following courses.

Competent Officer Course:

The Competent Officer Course is a comprehensive program designed to provide officers with a solid foundation in the following areas:

- Fisheries management and conservation.
- Navigation and vessel inspection.
- Legal aspects of fisheries enforcement.
- Safety at sea.
- Search and seizure procedures.

The objective is to equip officers with the necessary skills and knowledge to effectively enforce regulations, ensure sustainable fisheries and conduct successful investigations. The program encompasses a combination of classroom instruction, practical exercises, and hands-on training. Courses are conducted through a combination of tailored presentations, practical demonstrations, and field exercises. Officers are provided with up-to-date materials and access to experienced instructors.





## Success Criterion 4: Governance and Training



### *Investigative Interviewing Techniques:*

The Investigative Interviewing Techniques component is a specialised training program focused on developing the skills and knowledge necessary for effective interviews and interrogations. This includes:

- Ethical considerations in interviews.
- Developing rapport with subjects.
- Questioning techniques.
- Recognising deception.
- Documentation and report writing.
- STCW basic safety training

### *STCW training*

All sea going IFCA officers are required to take STCW basic safety training courses every 4 years. There is a legal requirement for seafarers to undergo this training : The International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers (STCW) sets the standards for training and certification of seafarers. IFCA officers currently undertake training in the following areas:

- STCW Personal Survival Techniques
- STCW Elementary First Aid
- STCW Fire Prevention & Fire Fighting
- STCW Personal Safety and Social Responsibility
- STCW Security Awareness

These courses provide essential knowledge and skills to respond to emergencies and ensure the safety of staff and others on board a ship. This is crucial in the maritime industry, where accidents can have severe consequences.

### **Future Plans**

During the next period we are looking to develop and deliver training in a number of key areas, these will include an update on our current syllabus for both Competent and Advanced Officers, as well as some new topics. Bespoke training evolutions covering case file preparation, courtroom skills, practical inspections, along with some industry related health and safety training such as working within the intertidal area are also under development.

*Dominic Bailey, Assistant Chief IFCO*



## Success Criterion 4 – Outputs

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION:</b> 4A) Budget Management - Handling invoices, Oracle Administration, compile budget, budget meetings etc. Manage and coordinate funding applications e.g. EU		<ul style="list-style-type: none"> <li>• Approved budget with quarterly updates</li> <li>• Maintained and processed 13 oracle statements</li> <li>• Held internal budget planning &amp; review meetings</li> <li>• Mid and end of year Internal audit completed</li> <li>• Budget held for NLTO post on behalf of AIFCA</li> <li>• Final EMFF claim made against NLTO training application</li> <li>• Processed 790 invoices</li> </ul>	
<b>ONGOING ACTION:</b> 4B) Annual planning and reporting		<ul style="list-style-type: none"> <li>• Created and published 2023-2024 annual plan and 2021-2022 annual report</li> <li>• Documented and presented to Authority and displayed on website</li> </ul>	
<b>ONGOING ACTION:</b> 4C) Facilitating staff matters - Run current staff performance monitoring system. Run annual staff workshop. Recruiting new staff. H&S reviews. Responsibility for HR matters – contracts, payroll, pensions etc.		<ul style="list-style-type: none"> <li>• Annual staff appraisals and taskings meetings undertaken</li> <li>• Maintained and updated H&amp;S documentation</li> </ul>	
<b>ONGOING ACTION:</b> 4D) IFCA Meetings - Run and provide support for quarterly IFCA meetings and technical panel meetings.		<ul style="list-style-type: none"> <li>• Held 5 quarterly meetings with approved minutes.</li> <li>• Held 2 x 2 day cockle review meeting for Members</li> <li>• Maintained handbook for Members</li> </ul>	
<b>ONGOING ACTION:</b> 4E) ,4K) Staff training - Accredited Enforcement Training, Internal training, PACE course training, Sea tickets/training, survey training (ATV training) etc.		<ul style="list-style-type: none"> <li>• 5 officers completed sea survival training</li> <li>• 6 officers completed 1st aid training</li> <li>• 5 officers completed fire fighting training</li> <li>• 4 officers completed investigative interview training</li> <li>• 2 officers completed the competent officer course</li> <li>• 1 officer completed quad bike training</li> <li>• 1 staff completed trailer training</li> <li>• 6 staff completed working at heights, manual handling and confined space training</li> </ul>	
<b>ONGOING ACTION:</b> 4F) General administration - Fill in timesheets, filing, post, travel & expenses, purchase card etc.		<ul style="list-style-type: none"> <li>• Management of timesheets</li> <li>• Processed 34 travel &amp; expenses claims</li> <li>• Processed 25 purchase card updates</li> <li>• Maintained data records and filing</li> </ul>	

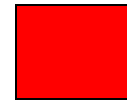




Objective completed



Significant progress made but objective not completed



Minimal progress made

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION:</b> 4G) Health and Safety Systems		<ul style="list-style-type: none"> <li>• Annual reporting of H&amp;S issues to Authority</li> <li>• Regular meeting of H&amp;S committee to discuss any issues and to put procedures in place to mitigate against further incidents.</li> </ul>	
4H) Health and Safety Audit		<ul style="list-style-type: none"> <li>• Enquiries made with KCC Health and Safety Business Operations Manager to review the existing Health &amp; Safety policy with meetings scheduled to discuss specific requirements. Covid 19 restrictions have delayed the ability to carry these out</li> </ul>	
4L) Accredited Training – Continue roll out accredited training		<ul style="list-style-type: none"> <li>• <i>Two officers to complete units 1-4 of accredited training for enforcement officers</i></li> <li>• NLTO post to facilitate officer completion for further review of project</li> <li>• Staff attend IFCA and MMO training</li> <li>• Accreditation programme undertaken by a select number of IFCOs, ACIFCO continues to develop programme nationally.</li> </ul>	
4M) National Lead Training Officer admin and support		<p>KEIFCA continued to facilitate and host the AIFCA National Lead Training post to 31.03.23 by:</p> <ul style="list-style-type: none"> <li>• Managing HR requirements on behalf of AIFCA to include overseeing of redundancy process following ending of funding stream.</li> <li>• Oversee grant funding application and claims process</li> <li>• ACFO &amp; OM sit as members of the National Training Group</li> <li>• Financial management of process and reporting expenditure, quarterly reporting and reviewing. Purchase of equipment and resources.</li> </ul>	



## Success Criterion 5: Evidence and Science Report

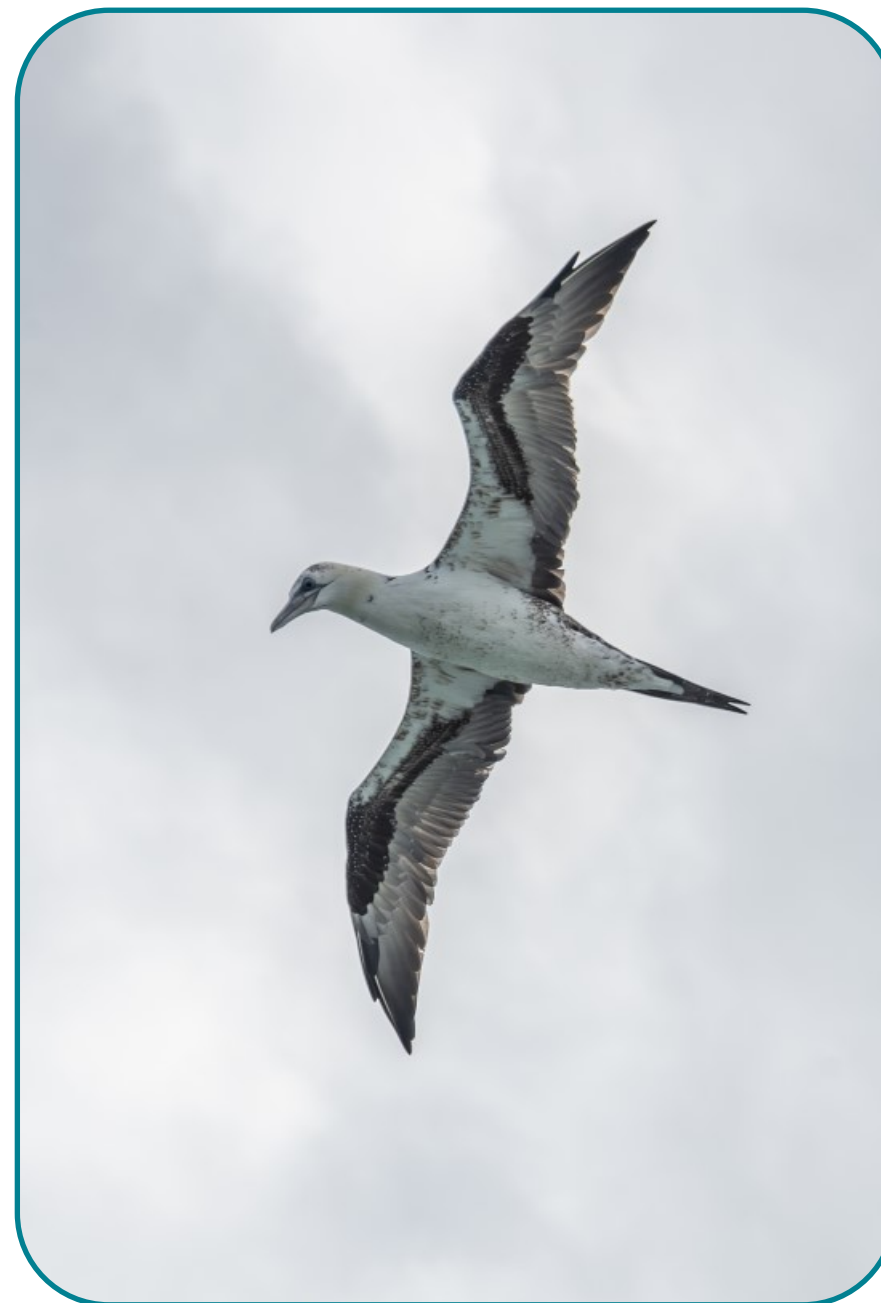
### **Evidence and Science Introduction**

KEIFCA carries out essential scientific research that supports the management of Marine Conservation Zones (MCZs), sustainable fisheries and provides access to evidence (data and information) for Kent and Essex IFCA-district. The highlights of the 2022/2023 research agenda are presented within three themes, namely, (1) Marine Protected Areas (MPAs), (2) Sustainable Fisheries, and (3) Access to Evidence.

We collect and analyse data during filed surveys to inform the status of various fishery stocks (primarily shellfish), and in turn, these are used to inform the management of fisheries in the district. For example, surveys of cockle stocks are used to set quotas for license holders, open or close certain areas to the fishery, and inform the opening of fisheries that operate under flexible permit schemes. Furthermore, this data provides evidence when fisheries are in decline and management measures are required, such as byelaws, regulations and enhanced enforcement.

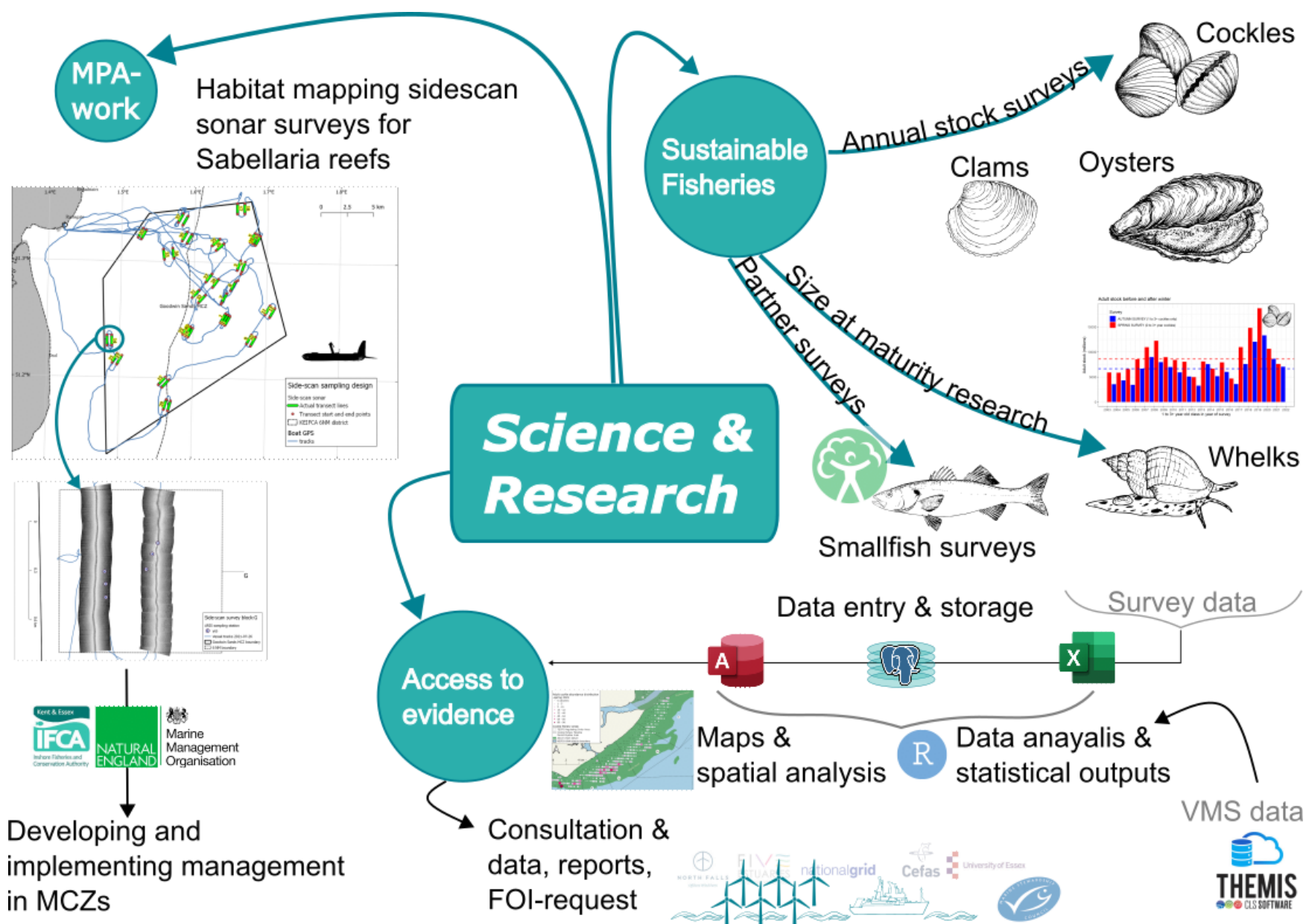
In 2022/2023 KEIFCA's research programme was back to normal after COVID-19 rules were relaxed when England began its phased exit from lockdown in March 2021. KEIFCA continued its Research Schedule, primarily focussing on core shellfish fisheries to provide evidence of the status of these fishery stocks and completed the habitat mapping started in 2022/2023 as part of its plans to put management in place for Goodwin Sands MCZ.

*Philip Haupt, Lead Scientific Officer*





# Success Criterion 5: Science at a glance...



## Success Criterion 5: Evidence and Science Report

### **Marine Protected Areas**

KEIFCA is the delivery body for MPAs enforcing regulations within Marine Conservation Zones (MCZs) and European Marine Sites within the district's waters. KEIFCA have nine MCZs across the district. As part of KEIFCA's role in MPA management, we have been developing MCZ Fisheries Assessments in 2020-2021 from which Management Recommendations stem for each MCZ. The following three Marine Conservation Zones require further fisheries management, namely: Goodwin Sands MCZ, the Swale MCZ, and Dover-Deal MCZ. As part of this process KEIFCA identified that it was necessary to gather additional data on the spatial distribution of *Sabellaria spinulosa* reefs (Ross worm reef) in Goodwin Sands MCZ because the Marine Evidence base lacked sufficient data for the IFCA to be able to put effective management in place. Following on from a first round of evidence gathering, KEIFCA used sidescan sonar and an ARIS camera to map out these Ross worm reefs in the Goodwin Sands MCZ.

The Goodwin Sands MCZ is a large (277 km<sup>2</sup>) MCZ off Sandwich Bay on the Kent coast in the Southern North Sea, is characterised by series of sand banks stretching approximately 16 km which overlays a chalk platform. The position of the sand banks are moved by tides, currents and waves, making it a navigational hazard. The area has a rich maritime history, with over 130 known wrecks have been found, but as 2000 are thought to have become wrecked upon the sands. Goodwin Sands MCZ was designated in 2019 and includes five protected features, of which Ross reef has been identified in particular as requiring management to aid its recovery to a favourable condition. Ross reefs are important because of their ecological role in enhancing the associated biodiversity and abundance of marine life where it occurs. However, the paucity of data, with the last previous surveys being in 2014, in combination with the ephemeral nature of these reefs, meaning that they move or may only exist in a particular area for a limited period were identified by KEIFCA as requiring further investigation.

The collected a second round of sidescan sonar data from surveys off FPV Nerissa in 2022, complementing its surveys from 2021, in partnership with Natural England in 2021 This data greatly improves our understand the spatial distribution of the reefs in the MCZ, and some insight about the ephemeral-nature of these reefs. This data will be added to existing data for the site on other features to help KEIFCA in developing site management for Goodwin Sands MCZ.



*Philip Haupt, Lead Scientific Officer*



# Success Criterion 5: Evidence and Science Report

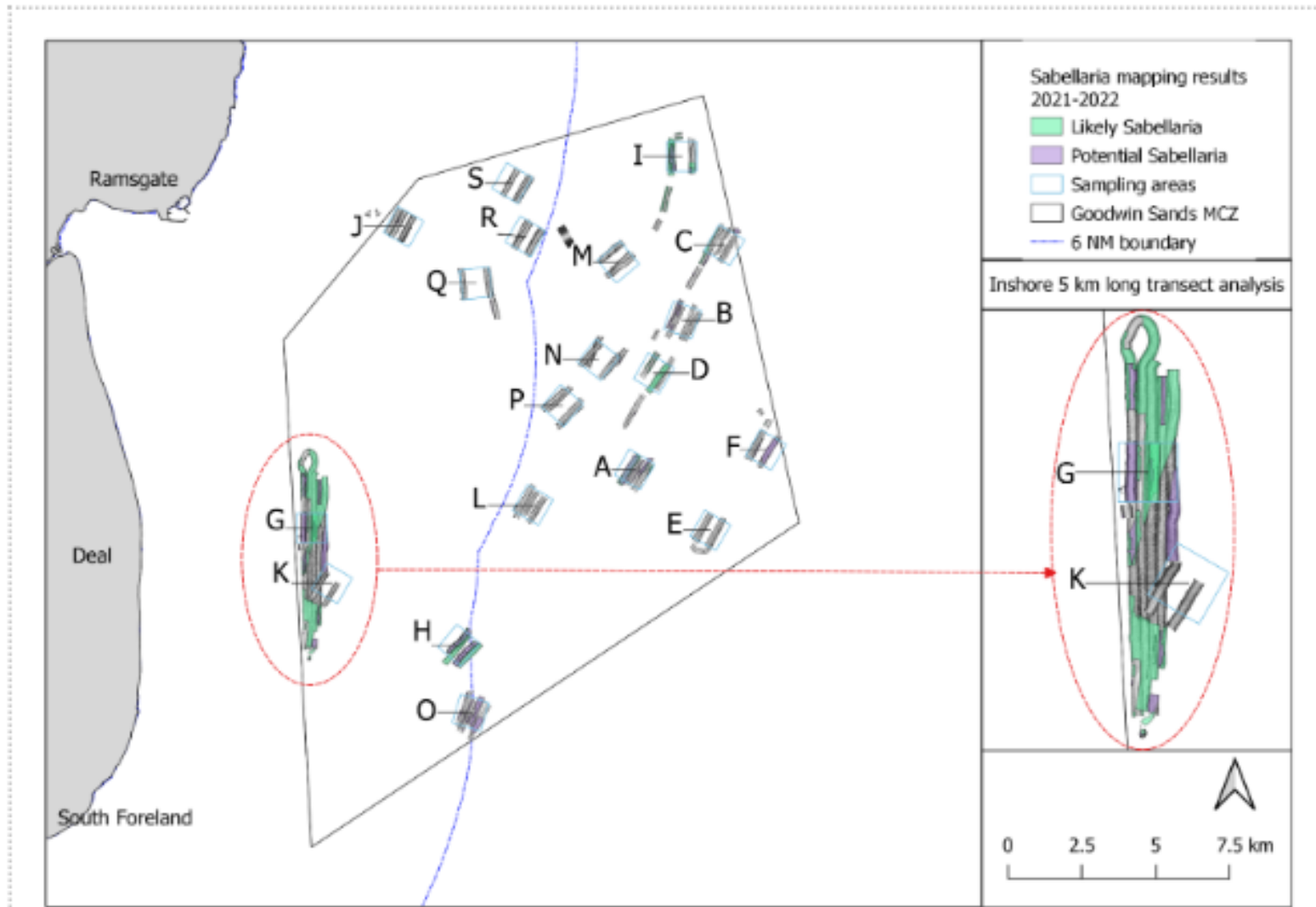
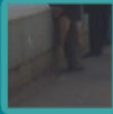


Figure 1. Map of sidescan echograms during Sabellaria surveys 2021 – 2022 in Goodwin Sands Marine Conservation Zone.

## Success Criterion 5: Evidence and Science Report

### **Sustainable Fisheries**

KEIFCA's sustainable fisheries research focusses on three key shellfish stocks, namely (1) cockles, (2) oysters and (3) whelks. Research into finfish are limited at the moment but KEIFCA were able to support a collaborative small fish survey Project with the EA and Essex University.

#### *Cockles*

The Thames cockle fishery is the most economically important shellfish fishery in the district and achieved MSC blue ecolabel status since 2020. The fishery is managed using total allowable catch (TAC) fishery based on annual surveys from which the stock biomass is determined. The annual survey is backed-up by 30 years of survey data providing a long-term time series from which stock trends can be determined and are used to inform the management regulations. The cockle survey is at the top of our research agenda supporting both the Thames Estuary Cockle Fishery Order (TECFO) and "Outside" permit cockle fisheries. We produce a separate, detailed, annual cockle survey report and only highlights from the survey and catches are presented here.

For our cockle surveys we deploy a 0.1m<sup>2</sup> Day-grab from our Fisheries Patrol Vessels (FPVs) to collect standardised samples of sediment and cockles from the commercially fished subtidal cockle beds in the Thames Estuary. These sea-based surveys are complemented by land-based surveys carried out in intertidal areas using custom fitted quad bikes which provides additional data from the shallow areas that are not easily reached by our FPVs. The cockles collected during the survey are aged, sized, and counted, before their collective weights are taken for each age-class and size-category. This information is used to derive establish stock abundance, biomass, assess trends and finally, to determine annual fishing quotas.

KEIFCA staff counted 13,429 cockles from 1,366 sampling sites in 19 of the cockle areas in the district during spring of 2022. In 2022 we estimated 8,043 million adult cockles from the main cockle beds on the Maplin Sands which was slightly below the long-term average 8,926 million, but slightly up from the 7,598 million estimated in 2021. A fishing quota of 5,852 tonnes was set prior to opening the TECFO (Thames Estuary Regulation Order) fishery. Fishermen reported a total annual catch of 5,147.5 tonnes for 2022 in this fishery.

In 2022 we compiled a research report detailing the impact of hydraulic suction dredging on benthic substrate, animals and the ecology as part of the update to the new regulation order which is being developed by KEIFCA to replace the current TECFO 1994. Part of this research used VMS data to create detailed maps of the fishery's footprint on various habitats and was presented at a TAG symposium in Jersey.



*Philip Haupt, Lead Scientific Officer*



## Success Criterion 5: Evidence and Science Report

### Oysters

Research of European native oysters is an important focus for KEIFCA's research plan because of the significant global and local declines recorded over the past century which must be balanced with its importance to local fisheries in the district. The native oyster fishery has been closed Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (BCRC MCZ) since 2015 and is updated based on an annual stock assessment survey. We carried out our annual survey for the first time since 2019 to assess the native oyster population abundance and biomass of native oysters in October 2022 in the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (BCRC MCZ). The survey results are used to inform opening or keeping the fishery closed in the public grounds of the BCRC MCZ.

The 2022 survey showed substantial declines of both native and Pacific oysters since the last survey was completed in March 2019. The declines were widespread across all sampling sites, with the largest declines observed in areas where they were most abundant in 2014-2019 surveys, like the mouth of Crouch, declining by 71 %, and in the Ray Sand channel by 73%. Owing to the low overall biomass and declining population determined using the population biomass model developed by Dr Lown in 2019 meant that the native oyster fishery in the BCRC MCZ remained closed in 2022.

In 2022 we continued work with Essex University support their efforts to obtain a better estimate of the oyster dredge efficiency (proportion of oysters captured on given piece of ground during a pass of the dredge) within different sediment types and under different spatial distributions of oysters (uniform or clumped). Dredge efficiency is a key parameter affecting the outcome of the oyster population model on its final predicted population size. In this work Tom Cameron is attempting to obtain a better understanding what the actual dredge efficiency is, which has up to now been assumed to be about 20 %.

We continued our engagement in ENORI (Essex Native Oyster Restoration Initiative) project which focusses on trailing methods which assess the recovery of European native oyster populations in a small area set aside for restoration activities exclusively within the BCRC MCZ.

In 2022 KEIFCA carried out a native oyster survey in the Medway as part of a project run by ZSL which aims to identify areas for Marine Habitat Restoration (<https://www.zsl.org/what-we-do/projects/marine-habitat-restoration>). The survey revealed presence of native and Pacific oysters but at slightly lower densities than in the BCRC MCZ. Results of this survey are due to be published by ZSL in 2023.



*Philip Haupt, Lead Scientific Officer*

## Success Criterion 5: Evidence and Science Report

### **Sustainable Fisheries**

#### *Whelks*

Whelks fishing is carried out by a commercial potting fleet throughout Kent and Essex district from Dungeness to Walton on Naze, with Whitstable Harbour reporting the highest annual landings in the district. The fishery has managed under Flexible Permit Byelaw made in 2011 and has had recent minimum size byelaws updated in 2020 and 2021 following size of maturity research.

In late summer 2022 we received reports of whelks from the Whitstable area that were in a poor body condition, appearing non-responsive, malodorous, and subsequently we had reports of whelk found dead in pots after only 2-days soak time of pots – this is unusual because whelks tend to survive well in pots for up to a week. We collected samples for toxicology and disease screening, documented reports and engaged with the whelk community from Whitstable to discuss the issue and formulate a response plan. The catch return data submitted by whelk fishermen confirmed a sudden sharp decline of landings from July 2022 which persisted throughout the rest of the year. KEIFCA launched an investigation to assess the impact of various environmental drivers including water temperature and water quality. Workshops were held with Bangor University, CEFAS and EA among other organisations to help develop a monitoring programme to be deployed in 2023 to assess the population status at the affected area. The strongest line of evidence at the time of writing was that the prolonged duration of abnormally high sea water temperatures sustained throughout the summer months in 2022 may have led to stress, movement away and mortality of whelks in the shallow subtidal area of Whitstable. This investigation will continue in to 2023.

We attended meetings held by science sub-committee of the Whelk Management Group (WMG) led by Seafish, which aims to develop a whelk research plan as part of the Fisheries Management Plan (FMP) for whelks. The proposed research plan is still under development and will be published alongside the Whelk FMP in 2023 for public comment. We also contributed to the discussions and shared information in the national IFCA Whelk Working Group (WWG) meetings. Both groups identified common concerns needed for a national FMP: Currently there is no stock assessment for whelks in English waters, lack of clarity around stock boundaries, and the need for national inquiry into better data to develop stock management measures. We have shared our rotary riddle and flat-bed riddles with researchers, Mike Kaiser and Moritz Eichman from Herriot-Watt University who are investigating the selectivity and behavioural effects of gear on whelks from capture to riddling to help improve and minimise impacts on whelks. Updates to this research will follow in 2023.



*Philip Haupt, Lead Scientific Officer*

## Success Criterion 5: Evidence and Science Report

### **Small fish survey**

KEIFCA carried out a small fish survey in the River Stour in 2022 as part of the EA's Water Framework Directive surveys. These surveys contribute to a long-term national database to better understand habitat use by juvenile fish in estuaries and rivers throughout England. We retained 10 juvenile bass specimens from this survey that were sent to Essex University as part of their research programme aimed at better understanding site fidelity of juveniles and adult life stages of fish through their chemical signature, which varies between different estuaries. This work will help identify the most important estuaries in the district to seabass.

### **Access to Evidence**

KEIFCA is in the process of developing a series of databases and computer scripts to make extracting data, and reporting on survey data more efficient. In 2022 a new database was developed to house the native oyster survey data which greatly improves our ability to analyse the data rapidly. We consulted and shared expert knowledge and data with Five Estuaries and North Falls windfarm developments, vessel sightings data with the MMO, whelk riddling data with Herriot-Watt University. We shared whelk allometry data with Bangor University and NW IFCA as part of further research into size at maturity work completed in 2021.



*Philip Haupt, Lead Scientific Officer*



## Success Criterion 5 – Outputs

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION: 5A) Annual Research Plan &amp; Report</b>		<ul style="list-style-type: none"> <li>Annual Research Plan and Report produced &amp; reported to Authority</li> </ul>	
<b>ONGOING ACTION: 5B) Participate in TAG meetings</b>		<ul style="list-style-type: none"> <li>Actively contributed to IFCA TAG meetings &amp; presented at TAG symposium hosted in Jersey</li> <li>Represented TAG at WMG meetings</li> </ul>	
<b>ONGOING ACTION: 5C) Sea-going scientific survey capability</b>		<ul style="list-style-type: none"> <li>KEIFCA vessels and equipment provided and maintained for the purposes of scientific surveys and data collection</li> <li>Vessel status reported to Authority at quarterly meetings</li> </ul>	
<b>ONGOING ACTION: 5D) Shore based scientific survey capability</b>		<ul style="list-style-type: none"> <li>Vehicles provided and maintained for shore based scientific surveys and data collection</li> <li>Planning and reporting to the Authority carried out.</li> </ul>	
<b>ONGOING ACTION: 5E) Support development of MPA management measures</b>		<ul style="list-style-type: none"> <li>Prepared evidence to inform management measures for Goodwin Sands MCZ</li> </ul>	



Objective completed



Significant progress made but objective not completed



Minimal progress made

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION: 5F) Cockle fishery stock assessment and fishery recommendations</b>		<ul style="list-style-type: none"> <li>• Delivered cockle survey, data analysis and management recommendations.</li> <li>• Held pre-fishery stakeholder meeting (License holders):</li> <li>• Produced and distributed cockle papers and annual report</li> <li>• Provided cockle samples for MESL.</li> <li>• Production of Habitat Regulations Assessment, including consultation with NE and subsequent advice.</li> </ul>	
<b>ONGOING ACTION: 5G) Native oyster stock assessment and fishery recommendations</b>		<ul style="list-style-type: none"> <li>• Delivered native oyster survey, analysed data</li> <li>• Prepared native oyster survey database</li> <li>• Produced oyster paper and delivered stock management recommendations to Authority</li> </ul>	
<b>ONGOING ACTION: 5H) Native Oyster ENORI projects</b>		<ul style="list-style-type: none"> <li>• Continued membership of ENORI</li> <li>• Delivered CEFAS oyster survey</li> </ul>	
<b>ONGOING ACTION: 5I) Whelk fishery management</b>		<ul style="list-style-type: none"> <li>• Analysed data and prepared annual whelk landings report</li> </ul>	Commence surveys in 2022-2023



## Success Criterion 5 – Outputs

Action	Completion Status	Outputs Completed	Next steps
<b>ONGOING ACTION: 5J) Small fish surveys</b>		<ul style="list-style-type: none"> <li>• Collaborated in EA small fish surveys</li> <li>• Provide survey capability and crew.</li> <li>• Obtained bass samples for University of Essex</li> </ul>	
<b>ONGOING ACTION: 5S) Consultation and engagement with major developments</b>		<ul style="list-style-type: none"> <li>• Evaluated key consultations and provided evidence when there is a potential impact on local fisheries, MPAs or byelaws</li> </ul>	Provide more written feedback to planning inspectorate and developers: Recruit scientific officer
<b>ONGOING ACTION: 5K) Data analysis and services</b>		<ul style="list-style-type: none"> <li>• Provisioned GIS services, data analysis to inform evidence requirements, e.g., maps, vessel sightings, fish stocks</li> <li>• Develop data analysis routines and reports to automate and increase efficiency of data analysis</li> <li>• Develop relational databases for key shellfish species monitoring and landings data: oysters, clams, whelks and cockles</li> </ul>	
<b>5L) Cockle fishery review (post 1994 - 2024 regulations order)</b>		<ul style="list-style-type: none"> <li>• Assimilate landings, survey and VMS data</li> <li>• Analyse data to inform management options</li> <li>• Generate map-options for fishery area extents</li> <li>• Prepare spatial analysis and analysis as a component of the management options for new cockle fishery post 2024</li> </ul>	
<b>5H) MSC review for cockle fishery</b>		<ul style="list-style-type: none"> <li>• Provided data and detailed explanations thereof</li> <li>• Attended 4 meetings over the course of the year.</li> <li>• Provided maps, and reports as needed.</li> </ul>	<b>Complete</b>

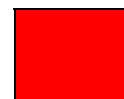




Objective completed

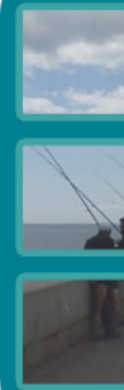


Significant progress made but objective not completed



Minimal progress made

Action	Completion Status	Outputs Completed	Next steps
<b>5M) Clam population assessment</b>		<ul style="list-style-type: none"> <li>Delivered surveys and data analysis as part of cockle survey and communication</li> </ul>	
<b>5N) Fisheries management plans for fish caught in district under Fisheries Act 2020</b>		<ul style="list-style-type: none"> <li>Participated in Whelk Management Group (WVG) meetings, analysis, and interpretation to assist development of fisheries management plans for whelks, cockles and oysters as needed.</li> </ul>	
<b>5O) Native Oyster - Fishing industry collaboration project</b>		<ul style="list-style-type: none"> <li>Engaged with oyster fishermen and discussed survey results</li> </ul>	Need for the project needs re-evaluation
<b>5P) Anglian Water Oyster survey</b>		<ul style="list-style-type: none"> <li>Provide logistical and technical support to CEFAS and Anglian Water to carry out Pacific and Native Oyster survey</li> </ul>	
<b>5Q) Survey Sabellaria reefs in Goodwin Sands MCZ</b>		<ul style="list-style-type: none"> <li>Funding secured</li> <li>Completed phase-2 of Sabellaria reef survey</li> </ul>	Process and analyse side-scan survey data
<b>5R) MCZ management</b>		<ul style="list-style-type: none"> <li>Using Goodwin Sands MCZ spatial planning and process to explore further development of this project for wider use in England.</li> </ul>	Funding applications Develop strategic management plan using ecosystem-based management and spatial optimisation



## Structure of the Authority

### **The formation of the Authority**

The Kent and Essex Inshore Fisheries and Conservation Order 2010 makes provision for the establishment of the Kent and Essex Inshore Fisheries and Conservation District and for the Authority for that district. The Order lays out the membership and proceedings of the Authority and makes provision in relation to the expenses of the Authority and to the reimbursement of members' expenses.

The Order states that the Authority is to consist of 21 members. The Order also makes clear the number of councillors to sit on the Authority (9) the number of "general members" or MMO appointees (10) (of which one member must be an employee of the MMO) and 2 "additional members" drawn from the Environment Agency and Natural England. The Order also lays out how the expenses of the Authority should be divided between the councils.

### **List of Members (\*\*Chairman, \*Vice-Chairman)**

<b>**Cllr John L Lamb</b>	Southend BC	<b>Cllr Jane Fleming</b>	Essex CC
<b>Cllr Mike Dendor</b>	Kent CC	<b>Cllr George Coxshall</b>	Thurrock BC
<b>Cllr Tony Hills</b>	Kent CC	<b>Cllr Habib Tejan</b>	Medway BC
<b>Cllr Andy Weatherhead</b>	Kent CC	<b>Mr Alex Baker</b>	NE representative
<b>Cllr Alan Goggin</b>	Essex CC	<b>Mr Justin Rowley</b>	MMO representative
<b>Cllr Michael Skeels</b>	Essex CC	<b>Ms Lindsay Faulkner</b>	EA representative
<b>*Mr P John E Nichols</b>	MMO Appointee		<i>Commercial- finfish</i>
<b>Mr Peter Wexham</b>	MMO Appointee		<i>Commercial - finfish</i>
<b>Mrs Esther Gilson</b>	MMO Appointee		<i>Commercial - shellfish</i>
<b>Mr Richard Turner</b>	MMO Appointee		<i>Marine environment and recreational fishing</i>
<b>Ms Tanya Ferry</b>	MMO Appointee		<i>Marine environment and other</i>
<b>Mr Eden Hannam</b>	MMO Appointee		<i>Marine Policy</i>

# Governance

Good governance is at the heart of sound decision-making and it is because of this that KEIFCA has already adopted or is about to adopt key working documents that will aid the smooth and transparent working of the Authority (i.e. Code of Conduct, Standing Orders, Financial Regulations, register of members' interests and a policy on Members' Allowances/Expenses). As well as this, KEIFCA has formally agreed to use Kent County Council for legal, constitutional, financial and HR support, as well as one-off support on procurement and other key activities.

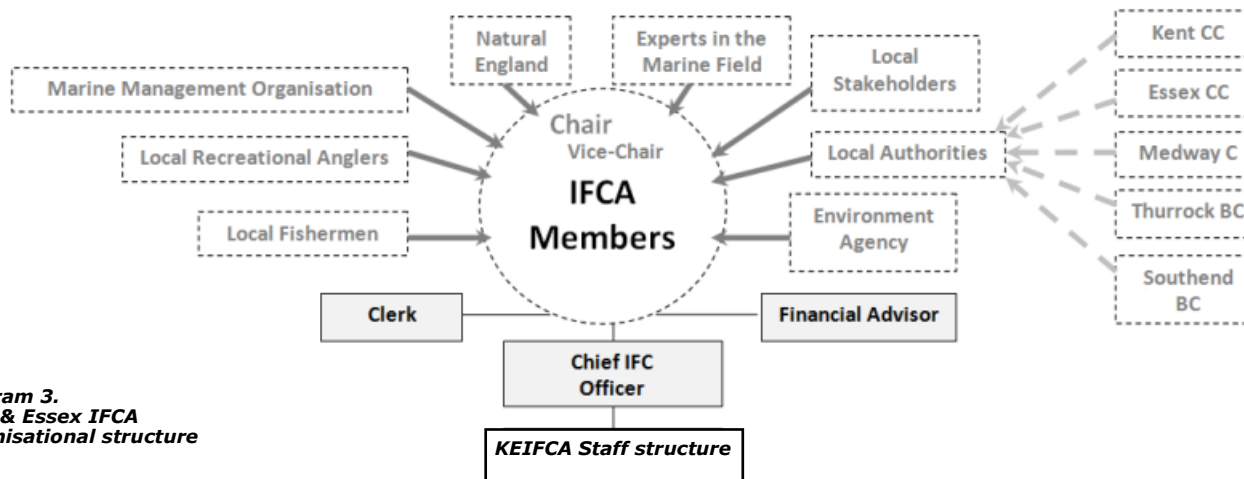


Diagram 3.  
Kent & Essex IFCA  
organisational structure

## Members

IFCA members are a vital component of helping KEIFCA deliver many of the key concepts expressed in the IFCA vision, but especially in helping to “secure the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry”.

IFCA members attend the quarterly IFCA meetings, with some members also attending specialist Technical Panel meetings where specific issues are discussed in greater detail; recommendations from these meetings are then taken forward to the next full meeting of the Authority.

The member’s role within the organisation (Diagram 3) is to decide and comment on the strategy and direction of the organisation and to make key strategic decisions (e.g. agree budget, staffing levels, stock management measures, etc.).





# Staff Structure

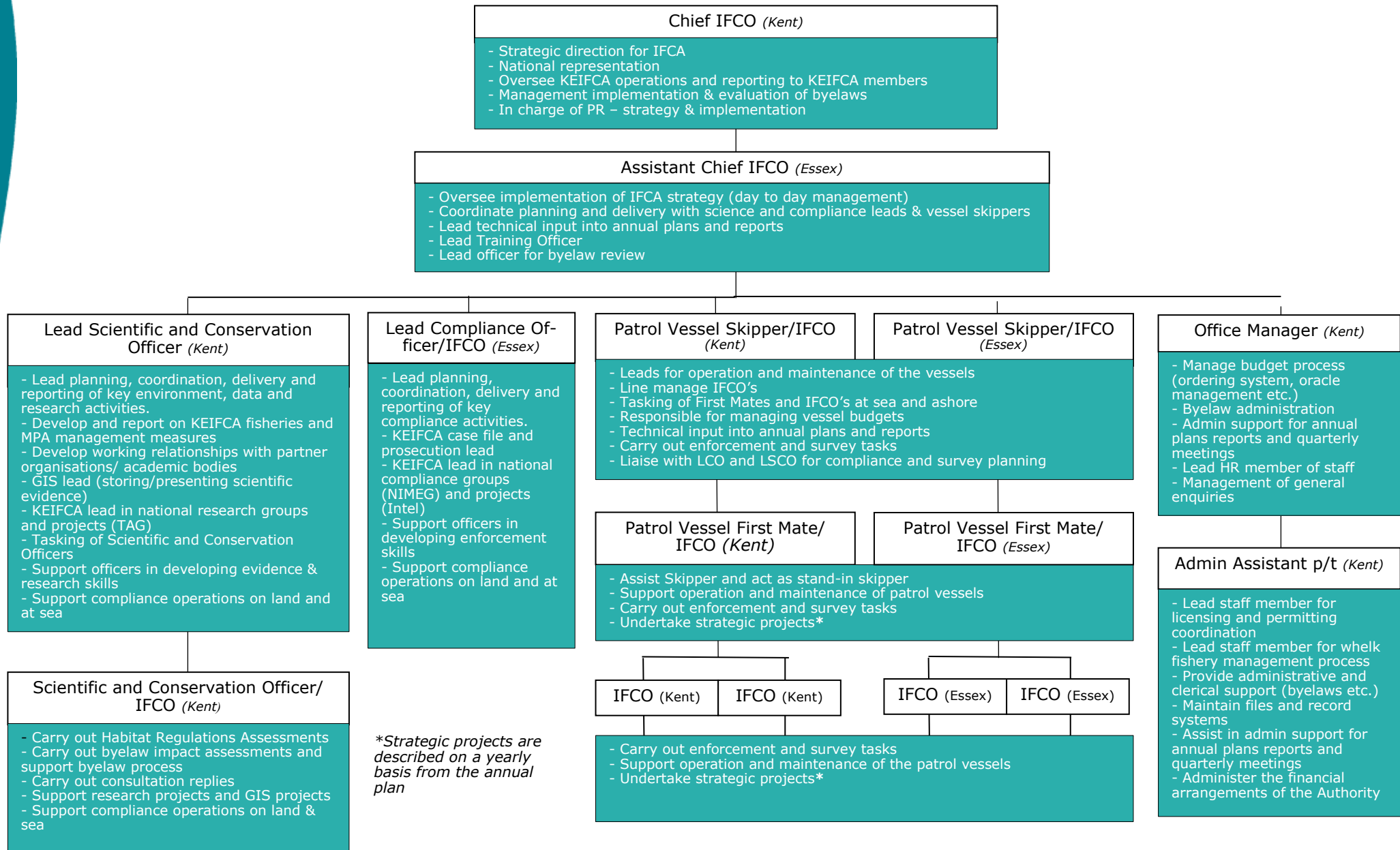


Diagram 4. Kent & Essex IFCA staff structure and key tasks

## Staff

The officers and administration staff implement the strategic decisions that the Authority (i.e. members) have agreed. The IFCA staff, led by the Chief IFC Officer (Diagram 4), are responsible for the ongoing operations of KEIFCA (e.g. appointing staff, setting and managing staff performance, implementing the agreed stock management measures and enforcement etc.) and reporting back to the Members on key issues and matters for discussion each quarter.

At present KEIFCA employs 11 full time staff, 2 part-time staff a part time Clerk and a part time financial advisor. In addition to this the Authority also contributes to the services of the Chair and Vice-chair. The structure and key roles of each member of staff are laid out in Diagram 4. One of the areas that KEIFCA is continuing to develop in the organisation is the ability of each officer to take on each other's roles, and expand their knowledge base so that each officer is competent in a wide spectrum of roles and duties. This approach will give KEIFCA a huge amount of flexibility in being able to deliver all of its duties and to react to events.

### **Staff performance and assessment**

KEIFCA currently apply a system used by Kent County Council (KCC) for staff performance monitoring. The system is based on a yearly review of an employee's performance using a series of objectives that are agreed between the employee's line manager and the employee. The objectives and the outputs of the employee relate back to the overall objectives in the annual plan. Dependent upon how well an employee meets, or exceeds, the targets set during this process, an employee may receive a small percentage increase related to their salary dependant on budgetary constraints and pay scale.

### **Training**

Staff continue to work hard to gain the qualifications and experience they need in order to fulfil the functions of the IFCA. There now exists within KEIFCA a core understanding, level of experience and knowledge related to the range of work of the IFCA.

The quarterly tasking's process (where staff report on their progress every quarter and identify new goals), has developed into a useful tool to help both staff members and senior management prioritise work streams and identify key issues.

Important training areas include developing IFC officer enforcement and seamanship skills, building on survey skills within the organisation and developing officers' ability to undertake a range of surveys and help staff expand their IT skills (including using GIS and website maintenance). KEIFCA is leading IFCA nationwide hope that the next year will bring better training opportunities than ever for our team.



## ***KEIFCA strategically working with partners***

### ***Joined up government***

KEIFCA has worked in conjunction with the other IFCAs to develop MoUs with key public authority stakeholders. The MoUs layout in broad terms how KEIFCA will work constructively with the Marine Management Organisation, Environment Agency, Natural England and Centre for Environment, Fisheries & Aquaculture Science.

As well as the detailed MoUs the MMO, EA and NE shared objectives have been included in our annual planning process which means that the cooperation and coordination between agencies is hard wired into the system. KEIFCA is looking to build on this relationship to establish protocols of how information will flow between organisations using this mechanism.

### ***Association of Inshore Fisheries and Conservation Authorities (AIFCA)***

KEIFCA played an important part in the setting up and effective running of the AIFCAs. The Association is an important national body that allows all 10 IFCAs to speak with one voice at a national level on key topics. KEIFCA see that the Association can act as an important body in helping IFCAs coordinate their actions and resources efficiently.

### ***Technical Advisory Group (TAG)***

KEIFCA continues to support and work through the Technical Advisory Group (TAG) to help it achieve its aims:

- To improve the quality and extent of fisheries management information through better coordination and dissemination of fisheries related scientific research.
- Define and apply best practice relating to the scientific & technical functions and responsibilities of IFCAs.

### ***National Inshore Marine Enforcement Group (NIMEG)***

KEIFCA played an important part in the establishment of NIMEG. The purpose of the group is to bring together expertise in the field of regulation and enforcement within inshore fisheries and marine conservation in order to develop and support joint working and consistency; identify and share best practice; and to promote professionalism and competence.

### ***Working with national and local associations and partnerships***

KEIFCA continues to build on the current partnerships it has already developed with a wide range of organisations, ranging from fishermen's associations, wildlife trusts, coastal partnerships, harbour authorities to power stations. KEIFCA also sees the need to develop new working relationships with organisations affected by the remit of IFCAs and it is hoped that the communication strategy will help engage with these communities in a productive way. KEIFCA sits on a number of local and national management groups ranging from national enforcement working groups to local marine protected area management meetings. KEIFCA also strongly supports and contributes to the Shellfish Association of Great Britain as well as the Thames Estuary Partnership.



# Stakeholder engagement, communication and consultation

## **Compliments and Complaints:**

Over the past year three formal complaints or compliments were received, these were addressed using our complaints procedure and we have retained our complaints procedure to deal with any which may occur in future. Sixteen Freedom of Information requests were received this year. All other issues have been addressed by the Authority as they have arisen.

### **Our people**

*We recognise that we rely on our staff to work with our stakeholders in delivering KEIFCA's objectives. We will:*

- ensure our staff are trained and competent to deliver our services.
- ensure our staff treat every user of KEIFCA services as they would wish to be treated themselves, with respect, courtesy and understanding.
- train all staff to work constructively with stakeholders.

### **Reaching us**

*We will provide different ways to help people contact us and access the services they need. We will:*

- make information about KEIFCA and its services easily available.
- publish opening hours and describe how to access services.
- Keep our website updated.
- provide a welcoming, friendly environment, easily accessible to all.

### **How we communicate**

*We want to make every contact a positive experience for our stakeholders.*

*We will:*

- always listen carefully to what stakeholders and colleagues say and be polite and honest.
- give a contact name and details.
- let people know what will happen next.
- point people in the right direction if we can't help.
- provide a suitable environment and ensure confidentiality.
- write letters, emails and publications that are easy to read and understand.
- respond to letters and emails promptly and when that is not possible, we will send an acknowledgement with details of who is dealing with the matter.
- let people know if there will be a delay in responding.
- ensure answer-phone messages are clear and tell people when to expect a reply

### **Involving our stakeholders**

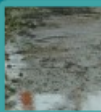
*We will seek to understand what our stakeholders need, and develop our services around our stakeholders' expectations. We will:*

- regularly ask stakeholders for their opinions.
- ensure that our stakeholders help shape the services we deliver.
- be honest about what we can and what we can't do.

### **Measuring how we perform**

*We want to make sure that our commitment to working closely with our stakeholders is making a difference, and we will assess our success by measuring what our stakeholders value. We will:*

- seek regular feedback on stakeholder satisfaction.
- publish details of how stakeholders can tell us about complaints, pay compliments and give us feedback and investigate all complaints thoroughly, as quickly as possible, and learn from our mistakes ([www.kentandessex-ifca.gov.uk](http://www.kentandessex-ifca.gov.uk)).
- train all staff in core standards of behaviour and how to interact with stakeholders.
- continue our commitment to make 100% of our services (where appropriate) available electronically.
- respond where possible to all public enquiries within 10 working days.
- issue licences and permits within 10 working days of receipt of a correctly completed form.





## KEIFCA Assets & Resources

**2** offices

Main office in Ramsgate, Kent  
Second office in Brightlingsea, Essex



**2** patrol vessels

FPV Tamesis 12m, Brightlingsea  
FPV Nerissa 17m, Ramsgate



**2** RIBs

FPV Vigilant 8m, standalone RIB  
FPR Nereus 4.5m, boarding RIB  
launched from FPV Nerissa stern ramp



**4** vehicles

2 Toyota Hilux's  
2 VW Caddy's



# Abbreviations

<b>ACIFCO</b>	Assistant Chief Inshore Fisheries and Conservation Officer	<b>MaCAA 2009</b>	Marine and Coastal Access Act 2009
<b>AIFCA</b>	Association of Inshore Fisheries and Conservation Authorities	<b>MCSS</b>	Monitoring and Control Surveillance System
<b>ASFC</b>	Association of Sea Fisheries Committees	<b>MCZ</b>	Marine Conservation Zones
<b>AA</b>	Appropriate Assessment	<b>MMO</b>	Marine Management Organisation
<b>CEFAS</b>	Centre for Environment, Fisheries & Aquaculture Science	<b>MoU</b>	Memoranda of Understanding
<b>CFP</b>	Common Fisheries Policy	<b>MSFD</b>	Marine Strategy Framework Directive
<b>CIFCO</b>	Chief Inshore Fisheries and Conservation Officer	<b>MPA</b>	Marine Protected Area
<b>Defra</b>	Department for Environment, Food and Rural Affairs	<b>MSC</b>	Marine Stewardship Council
<b>EA</b>	Environment Agency	<b>MSP</b>	Marine Spatial Plans
<b>ECC</b>	Essex County Council	<b>NE</b>	Natural England
<b>EFF</b>	European Fisheries Fund	<b>NIMEG</b>	National Inshore Marine Enforcement Group
<b>EIA</b>	Environmental Impact Assessment	<b>nm</b>	Nautical Miles
<b>EIFCA</b>	Eastern Inshore Fishing and Conservation Authority	<b>RSA</b>	Recreational Sea Angling
<b>EMS</b>	European Marine Site	<b>RIB</b>	Rigid Inflatable Boat
<b>GIS</b>	Geographical Information System	<b>SAC</b>	Special Area of Conservation
<b>IFCO</b>	Inshore Fisheries and Conservation Officer	<b>SBC</b>	Southend Borough Council
<b>IFCA</b>	Inshore Fisheries and Conservation Authority		
<b>KCC</b>	Kent County Council	<b>SxIFCA</b>	Sussex Inshore Fisheries and Conservation Authority
<b>KEIFCA</b>	Kent and Essex Inshore Fisheries and Conservation Authority	<b>SSSI</b>	Site of Special Scientific Interest
<b>LSCO</b>	Lead Scientific and Conservation Officer	<b>SPA</b>	Special Protection Area
<b>MC</b>	Medway Council	<b>TBC</b>	Thurrock Borough Council
		<b>TLSE</b>	Test of Likely Significant Effect
<b>MCA</b>	Marine Coastguard Agency		



# Meeting our duties

The Marine and Coastal Access Act, 2009 states:

(s.) **178** Annual Report

**(1)** As soon as is reasonably practical after the end of each financial year, every IFC authority must prepare a report on its activities in that year.

**(2)** A report under this section must be in such form and contain such information as the Secretary of State may require.

**(3)** A report under this section must be published in such manner as the Secretary of State may require.

A copy of the Marine and Coastal Access Act is available online at: [www.legislation.gov.uk](http://www.legislation.gov.uk)



## Further Copies

This document can be downloaded from  
[www.kentandessex-ifca.gov.uk](http://www.kentandessex-ifca.gov.uk)

Alternatively a hard copy can be viewed at:  
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[www.kentandessex-ifca.gov.uk](http://www.kentandessex-ifca.gov.uk)

