



Marine
Management
Organisation



To: Prof. Sam Evans CBE
Defra, Sustainable Fisheries & Marine
Planning Division

12 June 2015

Dear Sam,

Options for joint working between IFCAs and the MMO

Thank you for your letter of 12 May. Please accept this reply as a combined response from the Association of IFCAs, IFCA Chief Officers and the MMO. After receiving your letter, we held four meetings to explore how we might make efficiencies and develop collaborative working and we are now in a position to share our initial thoughts with you.

In the context of this work, it has to be understood that the IFCAs have a unique funding model in that the majority of funding comes from Local Authorities, with a valuable additional contribution through the New Burdens formula from Defra. The assets of the IFCAs are owned in many cases by the Local Authorities and the priorities set by the IFCAs have to be approved by the full Authority, which is made up of local representatives. The IFCAs are fully committed to closer partnership working with relevant organisations to deliver budget savings where possible.

However, there is undoubtedly a positive will between the IFCAs and the MMO to undertake greater collaboration and joint working, by building upon that which is already taking place and by giving it greater impetus and structure. This could include developing a shared culture and vision based on our joint responsibilities to promote sustainable fisheries and to protect the marine environment.

We see this being a gradual process moving from closer working initially, through to creating what might resemble a seamless organisation. The MMO is already starting to explore the capacity for joint working with a range of organisations with marine responsibilities, starting with the MCA and the IFCAs. We are also actively participating in the National Maritime Assets Co-ordination trial working in conjunction with the RN, UKBF, MCA, NCA and the NMIC. Later partnership working could include CEFAS, Natural England, JNCC, Environment Agency, UK Border Force, etc.

It is very clear that we can realise efficiencies and improve our delivery capabilities by working more closely together, recognising that the marine environment poses special challenges for regulators and managers. It is much harder to realise the capacity for cost savings, at least in the short term. The reason for this is that the regulatory responsibilities of the IFCAs and the MMO are undiminished. Indeed, they continue to grow and provide



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still further challenges for us, such as MPA management (and in particular the Defra revised approach), the CFP landings obligation and the new bass measures. In addition, the opportunities for cash savings when continuing with existing structures are very limited. For example MMO and IFCA staff could possibly travel together or represent each other at meetings. Whilst these immediate operational savings will be identified, they only offer very marginal cash savings in relation to departmental or organisational budgets. Real savings will only come through a different and more radical approach to joint working, accountabilities and responsibilities.

We have identified the following areas where collaboration and joint working can realise real efficiencies over the short to medium term. This can be taken forward as a programme of work and a number of the items have close linkages.

- **Accommodation sharing** – We are starting an exercise to identify office space and the capacity for co-location, hot desking, sharing meeting rooms, etc. Cornwall IFCA is already co-located with the MMO in Penzance and Southern IFCA is considering the possibility of co-locating with the Poole MMO as leases come up for renewal. The enclosed Annex shows some initial work undertaken by the IFCAs.
- **Potential functions for enhanced joint working and co-operation** – The IFCAs and MMO will consider what work can be absorbed within current resources and what can be done with resource transfer.
 - We will explore the capacity for IFCAs to support MMO work functions more, including:
 - i) control of fishing vessel activity to help address EC concerns (eg barrier patrolling to support the MMO's under 10m sampling plan, CFP pelagic reference fleet inspections, 6-12 miles limit patrolling),
 - ii) MPA monitoring work in 0-12miles,
 - iii) marine licensing inspections and applications in 0-12 miles and capacity for IFCAs to cost recover.
 - We will explore the capacity for MMO officers to support enforcement of IFCA byelaws.
 - IFCAs and MMO strongly support the introduction of fully monitored fisheries using technologies such as I-VMS. The I-VMS project is going through type approval testing at present and Devon & Severn IFCA is embarking upon an extensive trial that has the support of their local fishermen.
- **Training** – It is proposed to review the delivery of training for IFCOs and MEOs and the capacity for sharing burdens through cross-warranting, as well as developing common standards. This review will be linked with the ongoing work to roll-out recognised 'Skills for Justice' accreditation standards for IFCOs and MEOs, but this will not be deliverable by the end of July. The respective organisations may be able

to provide training free of charge to the other party, subject to ensuring any additional training burden can be adequately resourced as training schedules are already quite full.

- **Intelligence** – We will aim to provide for enhanced sharing of intelligence between the MMO and the IFCA's and the development of a common intelligence model. A project is about to start to develop and enhance the intelligence model used by the MMO and this will include engagement with the IFCA's. It will produce a revised series of enforcement co-ordination meetings to which IFCA's will be invited to participate. Better use and sharing of intelligence will lead to more effective planning, prioritisation and co-ordination of enforcement activity and this could lead to cost savings over time.
- **Enforcement systems upgrade** – The MMO's Monitoring, Control and Surveillance System (MCSS) is shared with the IFCA's, but it does not provide them with any outputs or adequately cover their byelaw and Regulating/Several Order work. Developing additional capacity to hold this information would lead to the likelihood of significant additional English enforcement activity being captured and reported. It is proposed to assign an IFCA representative to the MMO's Proteus IT systems upgrade project. This will lead to greater efficiencies over time and should raise inspection performance results overall. It will link back to the intelligence project.

In conclusion, both our organisations recognise the need and value in reviewing joint working. However, in the process of scoping this exercise, it has become clear that the output possible by the end of July represents the start of a much wider process. We will need to look more widely at opportunities and challenges facing the marine regulatory process, how this might affect the resources of the MMO and the IFCA's, and how it might link with other Defra initiatives.

We look forward to engaging with you and our other delivery partners in the near future.

We will ensure that you receive proposals by the end of July as requested in your original letter.

Yours sincerely,

John Tuckett (MMO Chief Executive)

Stephen Bolt (Chief Executive Association of IFCA's)

Andy Beattie (MMO Director of Operations)

Tim Robbins (Chair IFCA Chief Officers)

Annex 1: IFCA co-location snapshot

IFCA	Current position	Potential co-location
NIFCA	This does not happen; we work independently from our office in Blyth.	One or two MMO officers could sometimes work from the NIFCA office but that would not always be convenient as all work stations are often already filled. The MMO could potentially have room in the building where they operate from in North Shields to accommodate NIFCA. In theory a new Joint Office could be found but we are currently committed to the lease of 8 Ennerdale Road for the next 3 years or so.
NEIFCA	No co-location with MMO currently.	Limited or zero potential currently. NEIFCA is currently integrated and embedded with its lead local authority (and has been since 1996), East Riding of Yorkshire Council and shares accommodation, IT including databases, staffing and phone systems at preferential rates and levels of efficiency which could be unlikely to be replicated with another partner such as the MMO.
EIFCA	Nil	Eastern IFCA currently rents offices in King's Lynn and will be reviewing office accommodation arrangement in the next 18 months as the current lease approaches expiry. The opportunity to co-locate some staff with the MMO in Lowestoft is under active consideration.
K&EIFCA	KEIFCA has 2 offices at Ramsgate and Brightlingsea. MMO has an office in Hastings, Sussex (1 hour 45 mins from Ramsgate) a satellite office at Harwich (40 mins from Brightlingsea) and a main office at Lowestoft (2 hours).	Kent and Essex IFCA is one of the few organisations that is based around the Thames rather than uses the Thames as an organisational boarder. To this end we are at the south of the Eastern MMO district and the North of the Southern MMO district. Both the MMO main offices are outside our district.
SuIFCA	No significant co-location at present: Both MMO and IFCA have offices in Shoreham. An offer exists for MMO officers to utilise facilities such as meeting rooms if required and the wifi network can enable access via portable devices.	Sussex IFCA would be very willing to explore the opportunities to share office space. Further development of shared facilities would be good for the purpose of joint working. The central IFCA office has the greatest potential for a co-location site. The MMO Hastings office could provide a useful satellite facility for IFCA officers operating in the east of the District.

SoIFCA	none	Southern IFCA are looking to move in the medium term (2-5 years) we both have bases in Poole. We would welcome shared accommodation. We own property and have capital reserve, which could be used for this purpose. Co-location we feel would offer better levels of service.
D&SIFCA	Not at present. We do share meeting rooms with the MMO who have allowed us on numerous occasions to borrow their meeting rooms.	The MMO have two offices in our district. Their ability to move is restricted by Defra Estates There is no spare capacity within the MMO offices for IFCA officers to join them.
CIFCA	Cornwall IFCA, MMO and Cefas share a wing of a Cornwall Council building and we operate a shared reception service for visitors, staffed by CIFCA staff. This works exceptionally well as fishermen can resolve a range of queries for MMO and CIFCA during one visit and this has been commented upon very positively by stakeholders. Unfortunately the building is being demolished so efforts are being made to find alternative provision which will keep all three organisations together.	Every endeavour is being made to find alternative premises to maintain co-location of staff. There is an extremely limited supply of suitable office accommodation in west Cornwall of the type both organisations require, which may prove to be an issue.
IOSIFCA	There are no MMO offices on the Isles of Scilly	
NWIFCA	None	Current offices in Carnforth are needed for HQ functions. Relocating staff would be costly. Might be able to accommodate 1-2 MMO officers. Co-location in Whitehaven possible. IFCA has 2 underused offices