



Development of the Hand Working Permit Byelaw

Developing Catch Thresholds Reference Report.

A Summary of Response from the Consultation on Proposals to Introduce a Series of Catch Threshold Levels (Bag Limits)

(7th February 2020 to 9th March 2020)

20th May 2020

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Part 1

1. Aim of Report

This report (20th May 2020) has been prepared for members of the Devon and Severn Inshore Fisheries and Conservation Authority's (D&S IFCA's) Byelaw and Permitting Sub-Committee (B&PSC) and for all stakeholders to examine via its publication on the D&S IFCA website.

This report provides information that will influence the development of a Hand Working Permit Byelaw. Officers will use the information contained within this report to set out how, in their view, the Authority could proceed with the development of the Byelaw and the Permit Conditions that will be used to manage hand working fishing activity. A separate resolutions paper for members will be prepared in due course and discussed as an agenda item at a future B&PSC meeting. The resolution paper will be published on the D&S IFCA website.

This report documents summarised and anonymised information from the Development of Bag Limits for Recreational Fishers – Have Your Say 4-week consultation that ended on 9th March 2020 and is divided into two sections.

Part One of the report provides the information relevant to the development work including why the consultation was conducted and how it was conducted.

Part Two of the report focusses on the findings from the large consultation response which includes mixed opinions provided by those individuals and organisations that did engage in the information gathering exercise. For ease of reading, a summary of the consultation response has been included, along with a more detailed examination of the responses submitted and the suggestions provided by stakeholders for amended catch thresholds (bag limits). This report includes embedded information (Hyperlinks) that give readers access to additional information. All additional information embedded in this report is freely accessible within different sections of the [D&S IFCA Website Resource Library](#).

2. Background Information

On the 14th of November 2019, D&S IFCA's Byelaw and Permitting Sub-Committee (B&PSC) examined options to manage different types of hand working fishing activity. Hand working fishing activity includes the use of crab tiles, bait digging and a range of hand gathering methods. It was concluded by the D&S IFCA Byelaw and Permitting Sub-Committee that a new Hand Working Permit Byelaw should be developed. A further report¹, presented in January 2020, focussed on the potential structure of the Hand Working Permit Byelaw and how catch thresholds could be used independently to the use of permit conditions as a fixed provision within the Byelaw. A consultation was prepared to inform that process.

3. Drivers and Construction of the Byelaw

Several drivers as documented in the options for management report (25th October 2019) act as the basis for the development of a Hand Working Permit Byelaw. These include the duties set out within the Marine and Coastal Access Act 2009, recognising a precautionary approach to the management of fishing activities and to meet established byelaw making principles.

It was determined that the initial approach for the development of the Hand Working Permit Byelaw could involve the development of fixed provisions that would be placed into the overarching Byelaw rather than permit all fishers who wish to conduct hand working fishing

¹ Development of a Hand Working Permit Byelaw – Structure and Bag Limits (2nd January 2020)

activity. Although restrictions would apply in permit conditions, fixed provisions in the overarching Byelaw could include a series of catch threshold levels for different resources that could be taken each calendar day with no need for a permit.

As the first phase of this byelaw development is to establish a catch threshold level for those that would not be regulated via a permit, the strongest driver is Section 153, paragraph (2) (d) of the Marine and Coastal Access Act 2009.

- d) seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district.**

4. Balancing Needs

The Authority believes that the separation of different users (and appropriate restrictions for different groups) is not discriminatory; instead it is a justified approach to secure the correct balance for different fishery users who have different needs. The Authority has taken the view in its byelaw review process to date, that a recreational catch restriction (for consumption) is an appropriate approach. Catch restrictions as a requirement of a permit for recreational fishers have been implemented in the Potting, Netting and Diving (for defined species) Permit Byelaws.

In the case of the Hand Working Permit Byelaw, the resources removed are clearly not all for consumption and many are for use as bait for angling. The Authority believes that hand working as a recreational activity should continue, but on a proportionately restricted basis which reflects its non-commercial nature for many people engaged in the different activities. It was also recognised that there may be large numbers of people who wish to remove relatively small quantities of sea fisheries resources and that over regulation may not be an appropriate way to manage this limited removal. The consultation response informs the potential setting of catch threshold levels within the Byelaw.

In order to balance the needs of different persons removing the different species, it is important to gain a better understanding of who the people are and their needs. The consultation has highlighted different needs and expectations. Complications exist as this byelaw is, at this stage, focused on both the removal of resources for bait and the removal of resource for consumption. Further complications exist as it has not yet been determined what types of additional restrictions would apply within permit conditions and the criteria needed to obtain a permit or different categories of permit. This unavoidable lack of clarity in this development phase, coupled with potentially some misunderstanding by some stakeholders, has been reflected in some of the responses received during the consultation.

Catch Threshold Levels

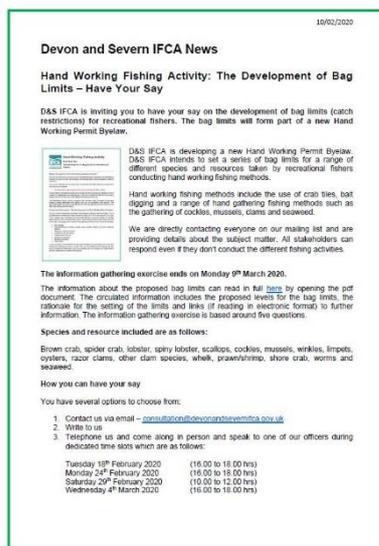
Members of D&S IFCA's Byelaw and Permitting Sub-Committee recognised that, it would be advantageous to seek the views of stakeholders to establish catch threshold levels through early 'Have your Say' engagement. It was envisaged that the eventual setting of proportionate catch threshold levels could help to achieve the following:

- Balancing the needs of various users and helping to meet conservation objectives
- Sustainability
- To drive behavioural change and high compliance
- To encourage legitimate activity and remove illegal, un-licensed and un-regulated fishing activity
- To reduce the administration burden on D&S IFCA
- To limit the intervention on the public's fishing activities

5. How the Consultation was Conducted

The Development of Bag Limits for Recreational Fishers – Have Your Say 4-week consultation had the sole focus of highlighting some early proposals and to generate a reaction and alternative suggestions. A key aim of the exercise was to collect more information to aid further development of the construction and drafting of the Byelaw.

Information was prepared and directly circulated via mail chimp to over 1100 people and organisations on the D&S IFCA email contact data base. The D&S IFCA Website and Facebook were used to support the four-week consultation that ended on 9th March 2020.



Links:

[Pdf version of Mail Chimp Circular](#)

[Pdf version of D&S IFCA Website & Facebook News Item](#)

The Mail Chimp circular explained the purpose of the information gathering exercise along with background information and questions related to the setting of catch threshold levels (bag limits).

Different resources were highlighted in tables with some rationale for the setting of the different catch threshold levels. Stakeholders were encouraged to provide their views and alternatives with their own rationale.

Options were provided for engagement as follows:

1. Contact us via email – consultation@devonandsevernifca.gov.uk
2. Write to us
3. Telephone us and come along in person and speak to one of our officers during dedicated time slots which are as follows:

Tuesday 18 th February 2020	(16.00 to 18.00 hrs)
Monday 24 th February 2020	(16.00 to 18.00 hrs)
Saturday 29 th February 2020	(10.00 to 12.00 hrs)
Wednesday 4 th March 2020	(16.00 to 18.00 hrs)

6. The D&S IFCA Catch Threshold Proposals for Consultation

Different species were highlighted in the consultation that were the most appropriate for limitation via fixed provisions within the overarching byelaw. The same species and others could be subjected to limitation within permit conditions, yet to be developed.

The species/resource groups were divided into three separate tables as follows:

Proposal - Species/Resource Group A

Species/Resource	Level (per calendar day)
Brown & Spider Crab	1
Lobster & Spiny Lobster	1
Scallops	15

Proposal - Species/Resource Group B

Species/Resource	Level (per calendar day)	D&S IFCA Rationale
Cockles	1kg	Considered to be enough for personal consumption
Mussels	1kg	Considered to be enough for personal consumption
Winkles	1kg	Considered to be enough for personal consumption
Limpets	1kg	Considered to be enough for personal consumption
Oysters	6 (in number)	Considered to be enough for personal consumption
Razor Clam	15 (in number)	Considered to be enough for personal use
Other Clam Species	1kg	Combined amount suitable for personal consumption
Whelk	5kg	Considered to be enough for personal consumption and expected levels available from hand working activity

Proposal - Species/Resource Group C

Species/Resource	Level (per calendar day)	D&S IFCA Rationale
Prawn/Shrimp	1kg	Considered to be enough for personal consumption.
Shore Crab	40 (in number)	A number rather than a weight for ease of compliance. Considered to be a suitable level for personal use.
Worms (any species)	100 (in number)	Considered to be a suitable level suitable for personal use as bait.
Seaweed	1kg (except for detached and found on the strandline.	No limit on removal of detached seaweed from the strandline as many beaches are cleaned for tourism purposes.

Part 2: The Consultation Response

7. Summary of all the Responses

The consultation reached a national audience via Angling forums and as a result the majority of responses were received by stakeholders with an interest in recreational angling. This had the effect that the basis for most responses related to the collection and use of species for bait, rather than commenting on levels suitable to remove for human consumption.

Based on D&S IFCA's previous engagement work, the number of responses received in this pre-consultation exercise is relatively high. Based on the responses, there is clearly opposition to the development of either a byelaw, or the catch threshold levels as proposed by D&S IFCA, that would be placed within the byelaw and impact recreational activity.

The basis of the byelaw has been questioned, including the absence of clear environmental evidence to demonstrate a need to limit the exploitation and protect different stock levels of all the sea fisheries resources highlighted. The Magna Carta was referenced in some responses and questions were raised about Defra Byelaw making Guidance and if D&S IFCA is complying with it. It is likely that not all those that have responded were aware of the three separate phases of pre-consultation (Crab Tiles, Bait Digging & Hand Gathering) that were conducted in 2019 to build D&S IFCA's base line information and evidence prior to an Options for Management decision making process.

How familiar every stakeholder was with the content of the consultation as circulated and the rationale for the setting of catch threshold levels is also not beyond doubt. Although background information was set out in the consultation circular, some responses including one from the Bass Anglers' Sportfishing Society questioned why there were no restrictions set out for commercial operators and the restrictions would only apply to the recreational sector. There is potentially an underlying concern by some that new regulation for hand working activity in D&S IFCA's District may act as catalyst for similar regional approaches (byelaws) around the UK and that this development work and the potential implementation of a new byelaw would be an attack on the recreational angling sector.

In general, many anglers feel that their removal of bait species has little impact on the environment and that should be the overriding consideration for the implementation of the Byelaw. Other duties for D&S IFCA and in particular the driver of balancing the needs of different persons engaged in the exploitation of sea fisheries resources in the District is either not fully recognised or can't be visualised at this time as restrictions for commercial operators has not been established or highlighted at this time.

The development of the Hand Working Byelaw is complex, and amongst other things, it was envisaged it would cater for species and resource that can be used for bait, but also in some cases those taken for human consumption. Although the overarching byelaw would recognise other factors and byelaw development drivers, such as environmental considerations (including the protection of seagrass beds), it would be the permitting mechanism that would add specific and flexible restrictions to those placed in the Byelaw. The permitting mechanism would allow for future stakeholder inclusive management, enable D&S IFCA to gather more data, and to some degree would be a pre-cautionary measure. Although conservation groups have suggested that restrictions, either as fixed provisions or within permit conditions could go further than highlighted at this time, it should be noted that current management is at a relatively low level. Any new legislation introduced by D&S IFCA would be a significant change to the status quo and produce an impact on those gathering resources for both recreational and commercial purposes.

It was envisaged that establishing proportionate fixed restrictions within the Byelaw would remove the burden for many stakeholders to be regulated via permit conditions. In isolation, balancing the needs of those removing resource for personal consumption is not without difficulty as set levels would be to a degree subjective, but when merged with removal of bait species, complications intensify.

D&S IFCA's proposed catch threshold levels and the desired needs of different stakeholders are different. The information gathered in the consultation indicates that it will be challenging or impossible, solely within the overarching byelaw, to fully recognise and balance the needs of those that forage for personal consumption and large numbers of people that remove resource for bait (for recreational angling). Spider crab is a good example, with the proposed level set at one per calendar day (based on personal consumption) and the opposing view by some anglers and clubs suggesting that 25 to 100 spider crabs in a soft-shell state should be the set limit for the removal of the species for bait purposes. Daily limits (per calendar day) are generally not favoured for the collection of bait species for reasons explained in the report. Although a seasonal or yearly limitation on species removal for recreational fishers has been suggested by some, this would be impossible to enforce if the Byelaw was implemented.

The level of response and the content of those responses demonstrates that there is apprehension from many recreational anglers about the potential impact that catch threshold levels would have on them regarding bait collection and further impacts relating to their angling activity. Many anglers feel that collecting their own bait adds to the fishing experience and many have stated that they collect for others when the opportunity arises. Many anglers have stated that they, family or friends have collected bait for years with minimal impact.

Many anglers feel that they have a right to collect their bait in the quantities they desire at the times that suit them or when tide and weather conditions allow. There were signs of confusion in some responses regarding the proposals to limit the collection of bait, rather than the use of bait for fishing. Although the catch threshold levels wouldn't prevent anglers using as much bait as they wish, it is likely that there would be little appetite for anglers to subsidise their potentially reduced collections of bait via purchases from bait shops. Coupled to this there is some concern that reduced opportunities to self-collect bait will impact supplies and result in higher prices from bait outlets to obtain the products.

The consultation has confirmed that the recreational angling sector is sub-divided between those that participate on a more occasional basis and those that are club members or more serious competition anglers fishing very frequently. The more serious angler sub-group collect relatively large numbers of resource and often store it for future angling sessions that may be on an ad-hoc basis. The need to over collect when there is no immediate need for the bait, and subsequent freezing down of the resource, was a reoccurring comment. It is highly likely that some recreational anglers' profit from trading the excess of bait they have collected, and this practice was cited by one of the angling clubs.

It is likely that very minor amendments to the suggested catch threshold levels would have little value in gaining acceptance or higher levels of support from the more dedicated or competition angler. The Angling Trust (Wyvern Region) submitted a response and commented that most of angling clubs in D&S IFCA's District are members. Although the Angling Trust collated some broad views on the catch threshold levels on behalf of around 40 angling clubs, they had the expectation that individual clubs would also submit their own views. Although not unanimously supportive of regulation, the views of angling clubs and the Angling Trust demonstrate that more support would be achieved if catch threshold levels were increased significantly for worms, razor clams and spider crab.

Separating worm species, rather than combining them, was a consistent theme and due to their different sizes, a combined total of 100 was seen to be totally unacceptable. A combined total of 250 worms was suggested by the Angling Trust, but views differed amongst individual responses and one angling club suggested that a daily allowance of 1000 Harbour Rag Worm should be considered. The views of individual stakeholders often echoed the view of angling clubs and in some cases demonstrated greater expectations regarding increased catch threshold levels for several species.

Responses of a strong environmental interest conflicted with the views of recreational anglers. Organisations that responded included the Devon Wildlife Trust, the Wembury Advisory Group and South Devon Estuaries Partnership. The generic grouping of species within the consultation hampered the ability of these organisations to respond in as much detail as they would possibly otherwise have done so. Separation of specific species was advised, so more detail regarding impacts on ecology could be considered and recognised in future potential management. Significant reductions for catch threshold levels were advised for many species including shore crab and worm species that should be separated and not combined due to vastly different ecology, size and harvesting methods.

The collection of pacific oysters was encouraged by the environmental groups, and a low catch threshold not favoured. Further views on seaweed collection were submitted and more detail regarding these responses is set out in Part 2 of the Report.

- The use of the pre-cautionary principle was encouraged, especially as the fixed catch threshold model (with no permit) limits the ability of D&S IFCA to monitor the activity

Support for the introduction of the Byelaw was submitted by some stakeholders in the Shaldon area. Many residents from this area raised concern in the hand gathering pre-consultation exercise conducted in 2019 and documented in a previous B&PSC report. The bag limit consultation was utilised by some residents, although at significantly reduced number and responses were received from Teignbridge and Shaldon District Councillors and the Teignmouth Harbour Consultative Body to demonstrate support for the introduction of the Byelaw. Although comments didn't extend to all species, the suggested catch threshold level of 1Kg per day for cockles, or not exceeding a level of 2kg, was supported.

Although Part 2 of the report provides more detail, the following table provides an indication of the ranges suggested during the consultation for the setting of catch thresholds for some key species.

Species	Low Suggestion	High Suggestion
Brown Crab	1 (combined)	4
Spider Crab	1 (combined)	25
Lobster	1	2
Spiny Lobster	0	2 (combined)
Mussels	1kg	3kg
Limpets	Zero to 500g	3kg
Razor Clams	15	100
Whelk	3kg	5kg
Prawns	500g	2kg or 100 in number
Shore Crab	5 to 25	100+
Seaweed	Zero to 1kg	30kg
Worms	100 or less (combined) Blow Lug: 100 King Rag: 20 to 30 Harbour Rag: 200 (in combination)	Blow Lug: 250 worms to 5lb in weight King Rag: 250 worms to 5lb in weight Harbour Rag: 1000 worms

Officer Comment: Further Development

There is recognition within many responses that the activity of hand working should be managed, in particular for commercial operators. Although not limited to the management of commercial activity, principles of D&S IFCA's byelaw development work includes:

- Driving behavioural change and high compliance
- To encourage legitimate activity and remove illegal, un-licenced and un-regulated fishing activity

The Angling Trust enquired about the potential to issue permits to non-commercial operators that have a need to remove more than the levels set as fixed catch thresholds and suggested future liaison with their Marine Regions Co-ordinator to work with the many angling clubs in the D&S IFCA District that are members. Many of the individual responses also urged for further engagement to develop the Hand Working Permit Byelaw.

B&PSC Tasking & Future Engagement

The task for the B&PSC is to consider the consultation response as it will be referred to in future decision making.

Establishing the structure of the Hand Working Permit Byelaw and the scope for management within the prohibitions of the overarching byelaw and what restrictions can be applied to the associated permit conditions is critical for further development.

This is highly complex, and it will need careful consideration by officers in the first instance, before the B&PSC are presented with officers' resolutions on how to proceed with the development work.

Although there are indications that a catch threshold level within the overarching Hand Working Permit Byelaw is not favoured by many stakeholders that offered a response, there may not necessarily be complete opposition to the development of permits that can support management of bait collection on a commercial and recreational basis.

In addition, the implementation of a new Hand Working Permit Byelaw would potentially gain more support generally, if different stakeholders are provided with more clarity at the earliest possible opportunity about all the aims of the Byelaw and how a permit mechanism will be used to recognise differing factors and needs.

Additional pre-consultation is likely to form part of the officer's resolutions that will be presented in due course.

Later in the development process, the Byelaw Technical Working Group must have clearly defined parameters for advanced drafting work. The construction of a draft byelaw (fit to be examined and potentially made by the B&PSC²) and the accompanying mandatory Impact Assessment, to be used in formal consultation, is dependent on the future decision making of the B&PSC.

After a potential Hand Working Permit Byelaw is made by the B&PSC, a period of formal consultation must be conducted to allow stakeholders the opportunity to express their support or opposition to the potential implementation of the Hand Working Permit Byelaw.

² The B&PSC have delegated powers from the Authority for byelaw making.

8. Who Responded?

The consultation reached a national audience via Angling forums. A total of 134 responses were received during the four-week consultation period which ended on 9th March 2020.

Most responses were from individual stakeholders and 52 responses were submitted in a petition type of format. There were responses on behalf of several organisations including 9 Sea Angling Clubs, the Angling Trust, and the Chair of the Angling Trust (Wyvern Region), representing around 40 Sea Angling Clubs. Organisations with a primary conservation interest included Devon Wildlife Trust (DWT), the Wembury Advisory Group (WAG) and the South Devon Area of Outstanding Natural Beauty (AONB) Partnership. Other responses included the Teignmouth Harbour Consultative Body, a Councillor from Devon County & Teignbridge District and a response from a Shaldon Parish Councillor.

Category	Number of Responses
Individually Crafted Responses	63
Petition Responses	52
Sea Angling Clubs/Angling Trust	12
Other Organisations/Councillors	7
Total	134

9. Questioning the basis of the Byelaw

Although there was widespread opposition to the catch threshold levels, seven responses were identified as offering the strongest objection. Rather than offering alternatives to the proposed catch thresholds, different levels of detail were provided as to why the development of the Hand Working Permit Byelaw should cease completely.

It was questioned how a byelaw can be considered if the species referred to are not under threat and although the mandatory Impact Assessment has yet to be prepared, it was of concern to some that the rationale for making a byelaw was not explained in detail within the consultation circular.

Although it was recognised that there may be some benefit to regulate commercial activity through the introduction of licencing (permits), unnecessary constraints on the recreational sector will result in increased demand to the benefit of the commercial harvester.

A shared view was that different areas and populations of sea fisheries resources have been exploited for many years with minimal impact or noticeable change. Areas and stock recover naturally, and the view taken in several responses is that natural factors such as storms and rough seas will have a greater impact than bait collectors.

Regarding crustaceans, it was highlighted that the proposals will have no discernible conservation benefits when commercial fishers (at sea) have no pot limitation and crustacean mortality relating to hand gathering is totally insignificant.

Whilst there is a recognised argument to protect features such as sea grass from the impacts of trampling, this should be done purely with spatial management. Defra byelaw making advice, informed by the Hampton Review, was referenced and it was highlighted that legislation should be the last resort when considering options for regulation.

Without any overwhelming need for catch threshold levels for all species and resource as proposed, it was suggested that D&S IFCA should reconsider its approach or risk legal challenge.

Specific Summarised Comments:

- Introducing such a byelaw for no discernible benefit is totally contrary to the government's aim of reducing the overall burden of legislation.
- Sea fishery resources are a commonly held national asset belonging to all citizens. It is totally unacceptable to legislate, in effect, in favour of the commercial sector at the expense of the recreational sector.
- Gathering bait from the shore has been established by case law as a legal right for non-commercial gathering. The threshold at which gathering worms becomes classified as commercial has been agreed to be a weight which recognises vast differences in size and their use as bait. A limit for worms of 1kg is considered acceptable.
- National principles have been agreed that an individual should be allowed to collect for family members and friends without reward.
- You have no authority to impose bag limits on recreational anglers.
- In English law, every man has a free born right to collect crustaceans, molluscs, worms etc for personal use and any interference or curtailing of those rights would be illegal and lead to court action.
- The Magna Carta gave rights for individuals to obtain shellfish and sea fishing bait. The law has never been rescinded and the law can't change without reference to Parliament.
- Your limits are ridiculous – 6-hour fishing competition, 3 hooks, 4 casts an hour will be 72 baits even with one per hook. I think it's an absolute disgrace and in direct conflict with the rights of the Magna Carta
- I have been a professional bait digger for years and all that will happen is shop closures and fishing clubs will collapse. You need to have environmental proof that bait foraging is having a detrimental impact on bird species and other reasons.
- As a match fisherman, the amounts of bait (as proposed) is nowhere near enough for me to fish a match that I pay good money to enter. Restricting my bait is not right, I would not stick to it anyway and it is illegal for you to do this.

10. Petition Response

A petition accounted for nearly 40% of the total response. There were 52 responses that used an almost identical series of words to express their opposition to the proposed daily catch threshold levels for the collection of different resources.

The petition was based on the needs for bait, rather than consideration regarding consumption and highlights the needs of more dedicated or competition orientated anglers as opposed to an infrequent angler.

Although it is not stated in the response, it could be assumed that there would be strong reluctance from these recreational fishers to subsidise a potential shortfall of bait species with a purchase/s from a bait shop to meet their fishing or competition fishing needs.

Although there is not strong objection to regulate the commercial sector; there is concern regarding the daily allowance (as a fixed byelaw provision) for worms, shore crab, spider crab and razor clams.

- The response does indicate that adjusted levels could form the basis of additional consultation.

The petition type of response has been transcribed in full as follows:

Message: To whom it may concern,

With regards to your consultation on the hand working permit byelaw, I consider the levels for recreational anglers to be punitive and unworkable. Whilst I do not object to the attempts to ensure regulation of the commercial sector, it should not be restrictive on the recreational angler. The areas of most concern are worms, shore crab, spider crab and razor clams.

To set one limit for all species of worm overlooks the fact that maddies (harbour rag) are a much smaller species used in bunches of 8-10 per hook. That being said, the limit of 100 worms a day is not workable for lug or rag either.

Even in a typical session, 100 of either species will be stretched. However, when you consider digging for a couple of matches over a weekend or digging for family or friends who may be providing other baits or simply unable to dig due to ill health, then the limits are considerably short of what would be required.

With regard to shore crab, spider crab and razor clams, you overlook the fact that recreational anglers collect and freeze these down to cover a number of sessions, often even a season. Spider crabs in particular are very seasonal for collection purposes. It is unreasonable to schedule time to collect all baits ahead of all fishing sessions, as most dedicated recreational anglers have a well-stocked bait freezer for off the cuff sessions.

I trust you shall account for all of the issues above in re-issuing realistic levels for personal use.

I look forward to hearing from you

11. Angling Trust & Angling Clubs

As highlighted in the main consultation response summary, the Angling Trust (Wyvern Region) submitted a response and commented that most of angling clubs in D&S IFCA's District are members. Information about the D&S IFCA consultation was highlighted on their Facebook page which helped generate the relatively large response to the consultation. Although the Angling Trust collated some broad views on the catch threshold levels on behalf of around 40 angling clubs, they had the expectation that individual clubs would also submit their own views. Responses were received from the following angling clubs, not all of which are within D&S IFCA's District:

- a. Colchester Sea Angling Club
- b. Newbiggin & District Sea Angling Club
- c. Coombe Martin Sea Angling Club
- d. DOESAC
- e. Honiton Sea Angling Club
- f. Paignton Sea Anglers Association
- g. Rodbenders Sea Angling Club
- h. Roving Rods Sea Angling Club
- i. Weston Outcasts Sea Angling Club

Although not unanimously supportive of regulation, the views of angling clubs and the Angling Trust demonstrate that more support would be achieved if catch threshold levels were increased significantly for worms, razor clams and spider crab. There was consistent opposition to introducing a catch threshold per day as opposed to other time frames. Weekly or even annual limits were suggested which account for seasonal collection, impacts of weather and tides, collecting for friends and family and a need to infrequently collect but store and freeze for future use. It was highlighted that bait diggers are prepared to travel long distances such as 40 or 50 miles to collect their own resource and overly restrictive catch thresholds would either make this a pointless exercise or do little to promote compliance.

Worms

The combining of worm species and the proposal to set a bag limit of 100 per day, regardless of the individual species, was the biggest concern. It was explained how different types of worms are used at differing times of the year for example, the use of Harbour Rag in the autumn and winter months when targeting flounder. The numbers of worms typically used in fishing competitions are far in excess of the catch threshold as proposed and it was suggested that a combined total of 100 worms will not meet the needs of a typical fishing session for many members of angling clubs or the more serious angler that may not necessarily be a member of a club. An example of a match lasting up to 12 hours, using King Rag, Blow Lug and Harbour Rag (often referred to as “maddies”) was provided by one angling club to demonstrate the numbers of worms often used.

- *A maximum of 2 rods and 4 hooks permitted.*
- *A single bait will last for 20 to 30 minutes*
- *King Rag & Blow Lug (assuming 3 worms per hook) at 30-minute casts = 12 hrs x 2 casts per hour x 3 worms = 288 worms for a day.*
- *As Harbour Rag are much smaller it may be that 12 worms are needed per hook. Even if the match was for 6 hours the number of worms required would be 864 worms.*

A different club suggested that **100 fresh blow lugworm, 50 large black lug** and possibly **20 to 30 larger king ragworm** would be enough for a day’s fishing; however, they agreed that considerably more than 100 harbour ragworm are needed.

- **Blow Lug & King Rag = 250 worms per day**
- **Blow Lug & King Rag = 5lb per day**
- **Harbour Rag = 1000**
- **Harbour Rag = 5lb per day**

Putting aside the increased numbers of worms that are required, the suggestion that a weight limit be used as opposed to a number featured in many of the responses.

Species	D&S IFCA Proposal	Lower number as suggested	Higher number as suggested	Other comments
Blow Lug Worm	100 (combined with all worms)	100	250	5lb in weight suggested
King Rag Worm	100 (combined with all worms)	20 to 30	250	5lb in weight suggested
Harbour Rag Worm	100 (combined with all worms)	200 or 250 in combination	1000	A level of 1000 should be converted into a weight for compliance & enforcement purposes

Other Bait

The following text and tables summarise the views of the Angling Clubs for other bait species.

Crab:

Responses highlighted that the proposed level set by D&S IFCA was based on consumption rather than a need to use the resource as bait. One spider crab is apparently enough for 4 to 6 baits, but only when it is in a soft-shell state. It was reported that the collection of brown crab & spider crab is seasonal and typically collected in the summer months when moulting. The infrequency of accessibility for its use as bait should be reflected in an increased daily bag limit.

Some responses focussed on shore crabs more than others. It was explained in one response that bait gathering for shore crabs is really split into two categories, one of peeler crab gathering from 'pots' or tiles set in the mud between high and low water marks, and secondly the collection of shore crabs by using baited drop nets from harbour walls or piers or collecting them from the shoreline.

Peeler crab gathering is determined by tide cycles, usually on a two-weekly basis at low water, but it is possible on a weekly basis at the at the start and end of a spring tide week. Peeler crab are not gathered daily as the pots or tiles need time to replenish after being fished. Peeler crab are used for targeting many species such as flatfish, rays, bass and wrasse. The number of peeler crab obtained will depend on the number of pots, but on average this will be one peeler crab per 5-10 pots. Peeler crab can keep for approximately 2 weeks after being gathered and can be frozen for use in the future.

It was reported that shore crab gathering can be done daily, usually at high tide when baited nets are dropped onto the seabed and left for a while and drawn back in, or at low tide when gathering under seaweed covered rocks or in rock pools. Mainly small shore crabs up to 50mm across are used for wrasse fishing, and a gathering of say 50 -100 crabs will provide enough bait for a wrasse fishing session, and those not used would be returned alive to the water on the day.

D&S IFCA was encouraged to examine the proposal of 40 shore crab once again and to consider splitting this to distinguish between peeler crab and shore crab gathering.

Species	D&S IFCA Proposal	Lower number as suggested	Higher number as suggested	Other comments
Spider Crab	1 (combined)	3 (combined) as a fall-back position only	25	A higher number is needed but it was suggested that it could be an annual limit
Brown Crab	1 (combined)	3 (combined) as a fall-back position only	No suggestion	
Shore Crab	40	50	100+	Consider splitting to distinguish between peeler crab and shore crab.

Razor Clams:

Fewer comments were received from Angling Clubs about Razor Clams, but those that did comment explained that they were only collected on big tides, are used as bait, but less so than other baits.

Species	D&S IFCA's Proposal	High number as suggested
Razor Clams	15	100

Prawn:

It was reported that club anglers occasionally collect prawn and 50 to 100 would be enough for a fishing season, typically targeting pollack, bass, wrasse and rays. The responses that did comment regarding prawns, indicates that 1kg per day, as a catch threshold, would be reasonable.

12. Other Organisations/Conservation Interest

Several organisations, and a small number of stakeholders, submitted a response from more of a conservation or precautionary perspective. Organisations included the following:

- Devon Wildlife Trust
- Wembury Advisory Group
- South Devon AONB Estuaries Partnership
- Teignmouth Harbour Consultative Body

Devon Wildlife Trust

Devon Wildlife Trust (DWT) stated that it is Devon's leading wildlife and environmental charity, and their interest is to ensure wildlife can thrive in the county and its seas. DWT (along with the wider Wildlife Trust movement) has played a key role in the development of the national network of Marine Protected Areas. Flourishing Seas is a theme of DWT's 25-year plan with goals around sustainable fishing and protection of species.

DWT welcomes the introduction of a Hand Working Byelaw with catch thresholds for recreational fishing. While DWT understands and welcomes the introduction of rules and regulations (instead of permitting) to this recreational fishery, they have urged the use of the precautionary principle when applying catch thresholds, as there will be little ability to monitor the fishery. DWT stated that D&S IFCA's excellent use of permits through other byelaws has allowed the ongoing monitoring of fisheries, with alterations relatively easy to apply as new data becomes available. DWT commented that the consultation lacked detail and did not help to identify all the conservation measures. The use of Minimum Conservation Reference Sizes (MCRS) was, in their view, an essential management measure to apply and furthermore hand fishing activities within Marine Protected Areas and in recognised sensitive areas should be prohibited. The use of information around quantities of species required for typical consumption may provide a guide around likely demand but does not provide ecological information around what is sustainable. The generic grouping of species was not favoured as many species included have substantially different biological and ecological situations and DWT urged D&S IFCA to directly consult with research organisations to ensure relevant ecological information provides a basis for sustainable fishing activities, divided into species or at least into groups of biologically and ecologically similar species.

Some observations from DWT included the following:

- **that piddocks are included in the Byelaw with a zero-catch limit. DWT reported that piddock are sometimes chipped out of rocks for food, causing irreversible impact on substrate and loss of habitat.**
- **DWT would like to see that approaches to hand fishing that cause habitat damage prohibited. This may include the breaking of bedrock or damaging rock crevices during attempts to collect crabs and lobsters.**

In summary, the proposed D&S IFCA catch threshold levels were considered by DWT to be in some cases excessive.

A response was received from the South Devon AONB Estuaries Partnership's Estuaries (SD AONB) Officer whose remit includes encouraging conservation and sustainable use and enjoyment of Devon's estuaries by their wider local communities. With duties extending to advising funding partners and involvement with the granting of enabling permits for activities and works within the South Hams District, the response was also of a precautionary nature. Although the Wembury Advisory Group has most interest in the Wembury Marine Conservation Area, they also commented on the catch threshold levels that have relevance to the whole D&S IFCA District. The comments received from both these organisations were similar in tone to the response submitted by DWT. The suggested catch threshold levels from these three organisations has been summarised into the tables below.

Resource Group A

Species/Resource	Suggested Level	Rationale/Comments
Crab	1 (combined)	Velvet crab should be included in combined amount
Lobster	1	
Spiny Lobster	0	The species are in early signs of recovery from their population collapse
Scallop	6, possibly 0	15 would be challenging to collect from the shore. Scallops collection in more sensitive foreshore areas should be prohibited.
Other Comment:	The collection of berried crab and lobster should be prohibited	

Resource Group B

Species/Resource	Suggested Level	Rationale/Comments
Winkle	1kg	Any more would be excessive for consumption. The species should be clearly identified.
Limpets	Zero to 500g or 10 in number	There are more than one species and should be separated. They can be slow growing and have ecological importance in rocky shore areas. This is potentially an exploratory food item. More than 1kg is likely to have a localised impact.
Razor Clams	Not specified	A limit should be established based on how they are collected. No tools should be used to dig them up and areas of seagrass should be protected.

Other Clam Species	Not specified to a maximum of 2Kg	Different species should be identified. 2kg was supported by THCB. Other groups didn't specify an amount.
Whelk	Not specified	This should specify common whelk. A MCRS should be applied.
Mussels	Not specified	
Cockles	1kg to 2kg	Residents from Shaldon support 1kg and the THCB supported a maximum of 2kg for cockles and clams.
Oysters	Zero to high levels	Differences between native European and invasive Pacific oysters were highlighted. It was suggested that the collection of pacific oysters should be encouraged.

As many of the above species are filter feeding organisms, concern was raised regarding potential bio-accumulate harmful dinoflagellates and risks to health via their collection and subsequent personal consumption.

The Teignmouth Harbour Consultative Body (THCB) submitted a response strongly related to shellfish collection, particularly cockles, from the Teign Estuary. This response highlighted large organised groups of people collecting shellfish in quantities too large to be for personal consumption. They were concerned that this activity was significantly reducing everyone's collective resource and had concern that it would be entering the food supply chain without appropriate quality testing or licensing. The response highlighted that Shaldon residents and local Councillors had raised similar concerns to D&S IFCA in the past. This is correct, with similar responses documented in the hand gathering pre-consultation report presented to the B&PSC in 2019. THCB have recommended that a catch threshold limit for cockles and clams be introduced and set at a level of 2kg per person, per day. It should be noted that local Councillors and residents that responded in this consultation supported a catch threshold of 1kg for cockles. Responses didn't extend to the other sea fisheries resources highlighted in the consultation.

Resource Group C

Seaweed

Regarding the hand collection of seaweed, the DWT highlighted that there is a large array of different species with vastly different ecologies and therefore should be divided to identify specific requirements and limitations. Ecological understanding of wider ecosystem role of each species should be a consideration when creating sustainable catch limits and slow growing species such as egg wrack should be afforded greater protection. WAG reported that a 30cm egg wrack plant may be up to 10 years old, while other species could reach a much larger size in a matter of months.

It was the view of DWT and WAG that rules on harvesting of some species (e.g. egg wrack, larger perennial kelps) should require that holdfasts and DWT suggested that 50% of stipe growth are not removed and rare and sensitive species (e.g. some red seaweed species) should have a bag limit of zero.

Harvesting of invasive species (e.g. *Sargassum*) should be prohibited to prevent spread (e.g. through spore transmission), although exceptions should be considered where done for conservation management (e.g. to prevent threat to seagrass beds). The DWT highlighted that GBNNSS has advice on invasive species including the SW RIMP. Rules should prohibit

clear harvesting of native seaweed, to both protect local ecology and prevent colonisation of invasive species.

Both the DWT and WAG agreed that the no-limit on harvesting detached strandline seaweed is unacceptable. All three of the conservation organisations highlighted that strandline seaweed has many benefits. It can rot down and provide further nutrients to saltmarshes and sand dunes. Furthermore, it is an important habitat for many species (e.g. invertebrates, birds, bats) and should not ideally be cleared for tourism or seaweed harvesting. Similar catch limits to live/attached seaweed should apply to detached strandline seaweed. If the removal of stranded seaweed can't be prohibited, it should as a minimum be strongly discouraged.

Comments and suggestions relating to other resources in section C of the D&S IFCA consultation are set out in the following table.

Species/Resource	Suggested Level	Rationale/Comments
Shore Crab	5 to around 25 as a maximum	40 is high for recreational angling needs and is an unreasonably high number. This scale of removal could result in ecological damage.
Worms	Not specified	Worm species should be separated as the removal of 100 may not be suitable for all species
Prawn/Shrimp	Maximum of 500g	1kg per person, per day is excessive.

Other comments and opinions

- Whilst the introduction of the Byelaw would be supported (from a conservation/precautionary perspective), there are significant concerns regarding many catch thresholds being too high and descriptions being insufficiently specific because they cover species with very different sensitivities.
- D&S IFCA should promote the catch threshold levels as a limit and not the target
- Should these byelaws also cover flowering plants e.g saltmarsh plants such as marsh samphire?
- Should the byelaws be adaptive to sudden novelty fads of popularity or previously unharvested species encouraged by online & TV cooks?
- BioSecurity – please promote the need for at the very least the ‘Check, Clean & Dry’ campaign to discourage the spread of INNS (and mariculture pathogens etc.) and encourage the proper disposal of all collected discards e.g. shucked bivalve shells, etc. ... i.e. not discarded back onto the foreshore.
- Any collection of fan mussels must be banned.

13. Individual Responses

The 63 responses categorised as individually crafted responses were mixed, with a small number of them in favour of elements of the approach to management or the proposed catch threshold levels with little or very minor adjustment.

Support

A handful of responses were received from residents and Councillors with a strong interest in the Shaldon area and the Teign Estuary, although the levels of support for the introduction of catch thresholds for species including cockles and mussels was more evident in the hand gathering pre-consultation exercise conducted in 2019. A daily catch threshold level of around 1kg for those types of species would be supported by these stakeholders, but the responses didn't expand to the other resources highlighted in the consultation. One of the responses captured the thoughts many living in this area and has been partially transcribed as follows:

“I strongly believe there is a need for new regulation in this area, having seen the damage being inflicted on the environment in the Teignmouth and Shaldon area. This has become apparent by gangs working in the harbour at low tide, ostensibly for personal use, but in reality, serving the commercial trade. This is therefore unregulated commercial fishing which we would not tolerate if the environmental impacts were significant. I fully support your proposal to introduce a 1kg limit per person as a means to differentiate between personal and commercial fishing”.

Some of the responses were supportive of management but were disappointed that self-regulation or voluntary codes were not enough to manage the activity. There was some feeling that it should be the semi-professional operators that are removing high volumes for illegal or un-recorded sale that should be the focus of new legislation, rather than all collectors.

There were some elements of support from those in the recreational angling sector, but this was a minority of cases. It was highlighted that any shortage of bait arising from bag limit restrictions could be topped up via a purchase from a bait shop or even a supermarket, if needed, but this was not a view shared by many.

“The availability of bait from specialist suppliers has expanded considerably in the last couple of decades ... although perhaps a little on the pricey side when postal carriage is included, it does nevertheless represent a clean and convenient way of obtaining a sufficient range of baits, that would otherwise be confined to a collection of just worm or crab if you made the effort yourself. The local supermarket also offers a surprisingly wide range of frozen shellfish baits at reasonable cost – far easier than traipsing across rocks and mud to find your own”.

The development of a permit byelaw was supported by the secretary of one South Devon based angling club who could see how new controls could minimise the potential over exploitation of different resources that, in his view, was far too excessive to be either for consumption or for recreational purposes (bait). The response drew the conclusion that having no limit on different resources promotes the continuing grey area of those operating as unregulated commercial operators. It was also suggested that there are a number of anglers that fish so regularly that they are in the category of being fanatical about their sport. This type of angler has a demand for bait that is far from typical and therefore, any implemented catch threshold levels for species that can be and are used for bait, would, more than likely, meet opposition from this sub-group.

Human Consumption

Although most stakeholders responded to the consultation from a bait collecting and bait use perspective, some, but not many, focussed on collection for human consumption. There were a few responses that suggested, the setting of catch threshold levels for human consumption should be the extent of this approach, with no need to extend this form of management to the collection of bait species. The later, for some, was viewed as nonsensical, as in their view recreational anglers will only harvest small volumes of bait with minimal environmental impact. Enforcement difficulties were cited with the view taken that officers would be unable to properly inspect, weigh or count numbers of resource taken for bait purposes.

Setting catch threshold levels for human consumption is subjective; however, D&S IFCA attempted to set out some rationale for this within the consultation, with levels set based on some on-line food recipes and to reflect that permits would not be used to closely manage the removal of the resources. As with the development of catch limits in other permit byelaws (permit conditions) for recreational consumption, the views of D&S IFCA and individual fishers responding in consultations were not always the same.

It is evident that some stakeholders conduct a whole range of activities to collect resource for their own consumption. This includes hooking, digging, salting and the use of drop nets, push nets and scissors to collect seaweed.

Regarding catch threshold levels, the need to collect for a family of four persons was highlighted and the difficulties accessing different sites due to available leisure time, weather and tidal considerations. Rather than a single crab and lobster, 2 lobster and 4 crab was suggested and, in their view, given the levels of commercial exploitation, anything less would be overly restrictive. 15 scallops may be challenging to collect but considered to be a reasonable daily bag limit. It was suggested by one stakeholder that velvet crabs are very edible and although not part of the consultation should be restricted to 8 per day, whether they are for bait or eating.

The levels for Resource Group B (Cockles to Whelk) was considered by some to be insufficient for consumption purposes. It was highlighted that there is a difference between wild mussel harvested from the shore and those rope grown or dredged from deep water. Thicker shells result in less meat yield and for that reason 3kg per person, per day was a suggestion for mussel.

3kg per day was also suggested for cockles, winkles, limpets and other clam species, other than razor clams. A daily amount of 20 razor clams was suggested as they can be eaten and used as bait, with 20 providing enough bait for a fishing session for two anglers. 5kg of whelks was stated to be generous and it was suggested that 3kg would be enough. A doubling of the catch threshold for shrimp/prawn to 2kg was suggested as being a more suitable level for consumption.

Seaweed

There were a couple of responses that focussed quite heavily on the use of seaweed for consumption. It was recognised that species such as Samphire should be afforded special protection and uprooting prohibited. A catch threshold of 1kg of this species was seen as acceptable. For other seaweed species one response highlighted seasonal collection of laver seaweed, with a normal collection of 30kg. This volume, when cleaned and processed, equates to about 20 packs of 1kg each. Packs are frozen, with 1kg enough to add to a meal for two persons.

Opposition

Opposition for catch threshold levels, mostly related to those species used for bait and the recognition that any limitation (greater or lesser than proposed) would be per calendar day, rather than spread over a longer time frame. It is clearly common practice for anglers to source their own bait, but not every day due to different reasons. Many responses highlighted that weather, tides and seasonality limit collection and for these reasons over-collection is favoured, with subsequent storing and freezing of the resources. Sharing of bait and the sharing of effort to collect the bait was a common theme within in responses. A few of the responses suggested that closed seasons or closed areas should be used instead of implementing a daily catch threshold limit.

Some quotations from selected responses help to summarise the collective view of many:

“Certain baits will only be accessible once a month on spring tides or even as little as only a couple of tides a year in the case of white ragworm. The daily bait allowance does not take into account tide cycle and not been able to collect bait during bad weather, neap tides, or when tides are too late/ coincide with work”.

“I personally through winter months digging one to two tides a month. Correct careful storage of bait means I have a supply to last till next month’s big tides with no waste. A Limit would mean trying to dig prior to nearly every fishing session. This does not favour the working angler with very little spare time on his hands”.

“Shore crabs are usually collected at specific times of year and frozen down for future use. Limiting to 40 crabs is too little to accommodate this practice. Something like 100 would be more suitable”.

“Why spider crabs are limited to 1 per day, I really don’t know. Spiders are hugely abundant and available to collectors so infrequently and at such specific locations that they should have a much higher limit. I’d suggest 30”.

“Certain proposed quantities identified in your consultation document are woefully inadequate. For example, 15 razor clams per day. These shellfish are usually only collectable from the shore on big spring tides a handful of times per year. When I forage for them, I would expect to collect around 100 and these would be frozen and last me the whole year”.

“The limits are ridiculous. Consider the situation of me digging for the four of our family to go fishing. We use 2 rods with an average of 2 hooks on each rod and worm bait lasts 10-15 minutes maximum. If there are to be limits, they need to be weekly limits to allow those of us further from the coast to do one trip and collect our bait. 700 worms and 280 crab (shore crab) over the week would allow my family and I to fish twice per week”.

“A lot of anglers collect their own bait as it is the only affordable option. This may still involve driving many miles to a chosen bait bed incurring fuel costs which need to be balanced against a successful bait collecting trip”.

“Whilst hand-digging and foraging the shoreline will never die out totally, it is not of such magnitude that it presents a serious problem to specie conservation. Why impose legislation on the hobbyist angler when there is no justification for doing so”.

“To the angler, the introduction of such a byelaw will be viewed upon as an unwarranted interference in a stress-relieving / healthy pastime enjoyed by many thousands in the UK - if the authorities wish to alienate those very people that provide an essential intelligence service (“eyes and ears on the ground”), then this intrusion will fit nicely”.

The levels of resource suggested by many individuals, more opposed to catch threshold limits, were very similar to those submitted by the angling clubs. In some cases, they were more excessive but sometimes with the caveat that it would be a limit per week, month or year, rather than a daily removal.

Suggestions relating to the resources from a bait perspective included the following:

- **Shore Crab:** 100 per day or 280 per week
- **Spider Crab:** 15 per day or 100 per year
- **Prawns:** 2kg per day
- **Razor Clams:** 150 per day
- **Worms:** If combined, make it 5lb per day

Regarding the practice of bait digging, it was suggested that a daily limit of worms (at too low a level) will potentially have an adverse impact on habitat. The proposed regulation will potentially stop people digging on behalf of others. Worms will be dug over shorter timeframes by more people and result in far more holes being produced in the more regular digging sessions. As more holes will be created, the time needed for the sites to repair will be increased.

As with several of the angling clubs, many of the individual responses commented that further engagement with the recreational angling sector would be of use in the development of the Hand Working Permit Byelaw.

14. Other Responses with Minimal Content

There were about a dozen responses that didn't contain enough information to add significantly to the report. Some were seeking answers to simple questions, some were related to other subject matter, and some were strongly opposed, but with no rationale for the opposition.

Examples (extracts) are shown below:

“Sorry but all sounds too big brother for me, and I think you ignore the big issues and look to punish the easy target as you have done with bass. As we speak the last pollack now full of roe is still being decimated by gill nets at every wreck within 50 miles of Plymouth.....I now expect you to punish the poor angler on the pollack fishing with restrictions the same as bass to cover up your limitations”.

“People like Stalin, Adolf Hitler, Pol Pot, Mussolini, would be proud of your efforts. This is what the common fisheries Policy was lacking”.

15. Further Information (Hyperlinks)

The following information that is embedded in this report is freely accessible within D&S IFCA's website resource library.

Pre-Consultation Communications

- [Crab Tiles: Call for Information Mailchimp Circular \(January 2019\)](#)
- [Crab Tiles: Call for Information Website & Facebook News Item](#)
- [Bait Digging: Call for Information \(March 2019\)](#)
- [Bait Digging: Call for Information Website & Facebook News Item](#)
- [Hand Gathering: Call for Information \(June & July 2019\)](#)
- [Hand Gathering: Call for Information Website & Facebook News Item](#)
- [Hand Working: Bag Limits Have Your Say \(February 2020\)](#)
- [Hand Working: Bag Limits Have Your Say Website & Facebook News Item](#)

2019 (pre-consultation) Reports to the B&PSC

- [Managing Hand Working Fishing Activity: A Focus on Crab Tiles \(May 2019\)](#)
- [Managing Hand Working Fishing Activity: A Focus on Bait Digging \(May 2019\)](#)
- [Managing Hand Working Fishing Activity: A Focus on Hand Gathering \(July 2019\)](#)

Decision Making

- [Managing Hand Working Fishing Activity: Options for Management Report \(Oct 2019\)](#)
- [Development of a Hand Working Byelaw – Structure and Bag Limits \(January 2020\)](#)

Past minutes of all B&PSC meetings (that have been approved for accuracy) can be viewed free of charge in [Section B of D&S IFCA's Website Resource Library](#).

End of Report (20th May 2020)