Channel Non Quota Species Draft Fisheries Management Plan (FMP)

Summary of the Channel Non Quota Species (NQS) FMP

The Channel NQS FMP has been prepared for the purpose of meeting the requirements set out in the Act. This has been developed by the Marine Management Organisation (MMO) on behalf of the Department for Environment Food and Rural Affairs (Defra). The FMP was developed in collaboration with a working group made up of fisheries stakeholders, including commercial and recreational fishers. The MMO also engaged widely with coastal communities, supply chain businesses, scientists, and government agencies. Contributions from environmental non-governmental organisations have been considered across all FMPs in a group coordinated by Defra. D&S IFCA represented the six IFCA Districts covered by the NQS FMP as was a member of the working group.

The Channel NQS FMP is one of two of the six frontrunner FMPS that have a limited and defined area of application. The NQS FMP only affects the waters along the English Channel. One of the challenges to this FMP is the inclusion and consideration of 19 species pout, brill, turbot, lemon sole, john dory, red mullet, grey, red and tub gurnards, lesser spotted dogfish, common and starry smoothounds, common and elegant cuttlefish, common and curled octopuses, veined and European common and common squids. Landings of the 19 species is dominated by; beam trawls; otter trawls and demersal seines and flyseines.

All FMPs identify the need for more evidence, but this requirement is far higher for the Channel NQS FMP. Most scientific work has been focussed on informing the decisions regarding stocks managed by quota.

Key Goals and Proposed Management Actions of the FMP

Goal 1 Deliver effective management of demersal non-quota species in the English Channel

Goal 2 Deliver wider biological sustainability
Goal 3 Better understand and optimise social and economic benefits
Goal 4 Develop on partnership working to build capacity for the industry to be able to input into matters affecting NQS fisheries management
Goal 5 Better understand the wider non-quota species evidence gaps and develop the evidence base

To deliver the goals, the FMP sets out a series of actions in the short and medium to long-term.

Proposed Early Management Interventions and Officers' Comments (in blue)

Goal 1: Deliver effective management of demersal non-quota species in the English Channel

Among the six planned actions it is proposed that consideration should be given to how to define the precautionary approach in the Channel NQS mixed fisheries, including how it will be initiated, implemented, and assessed in line with data collection and management needs. The proposed approach is to define the precautionary approach, how it is applied, mechanisms and triggers for initiation, research and data collection needed, and possible actions for implementation.

In the Fisheries Act 2020, "precautionary approach to fisheries management*" means an approach in which the absence of sufficient scientific information is not used to justify postponing or failing to take management measures to conserve target species, associated or dependent species, non-target species or their environment'.*

Whilst it is recognised that the species in the NQS FMP are data deficient, the absence of data should not necessarily be a justification for taking action. There are strong indications that certain stocks are under environmental and fishing pressures and the Fisheries Act allows regulators to take early interventions to mitigate the risks. Developments in fisheries as seen in flyseining requires much earlier intervention by regulators so that the potential impact can be considered rather than managing the impact of a developing or developed fishery.

The NQS FMP proposes some management of flyseining in the short term, which is welcome, but other measures that could be applied are considered for the medium to long-term which, given the anecdotal evidence of the impact of the fishery, may be too late. REM could be considered in an earlier timeframe and made a mandatory requirement to start building a much stronger evidence base for future management interventions.

As a precautionary measure, the FMP proposes to protect pre-spawning juveniles and promote recruitment population by introducing Minimum Conservation Reference Sizes (MCRS) for lemon sole (25cm), turbot (30cm), brill (30cm), common cuttlefish (23cm).

Turbot and brill used to have the same national (EU) minimum landing sizes that are suggested in the FMP. Lemon Sole and Cuttlefish have not had national minimum sizes before. The FMP recognises that to introduce the MCRS for the species gear mesh and possibly other design, and net geometry will be needed. Each species has different discard survival rates dependent on gear type and the commercial catching sector query whether the introduction of a MCRS for cuttlefish will have an overall benefit to the fishery. The MCRS is only likely to apply to the towed gear sector as the inshore potting fishery targets the larger cuttlefish before spawning and laying their eggs. Officers would support the introduction of a national MCRS for lemon sole, turbot and brill but more research is needed to understand the benefit of introducing a MCRS for cuttlefish due to its reported high discard mortality compared with other management, such as seasonal closures that are also to be considered in the short-term.

Goal 2: Deliver wider biological sustainability

The NQS FMP consider this goal by seeking to identify and then mitigate pressures on the relevant species and understanding and reducing, where needed, the impact of exploiting the NQS fisheries on the wider environment.

Included in the proposed actions is the short-term measure to understand and define the targeting behaviour of the fleet. This will be best achieved with the national roll out of IVMS on the under 12 metre fleet but also requires the over 12 metre fleet to be monitored more closely by increasing the positional data from two hours to three minute reporting. This will provide high resolution activity maps across the whole of the fleet.

In the medium to long-term the FMP identifies the need to better understand the impact of fishing gear interactions with the marine environment. D&S IFCA and other IFCAs have undertaken environmental impact assessments of all demersal towed gear and static gear interaction in Marine Protected Areas across the full range of habitats, from fine sand to rocky reef. It is unclear what additional information is required. JNCC and Natural England will be able to provide information on the vulnerability of habitats and different gear interactions.

Goal 3: Better understand and optimise social and economic benefits

The NQS FMP sets out to identify who is reliant upon the NQS fisheries and the social and economic benefits that are derived from those fisheries on coastal communities.

The generic term coastal communities is referred to across all frontrunner FMPs. It will be important to identify more closely the importance across communities dominated by small vessels compared to larger vessels and bigger ports and the interest to the recreational sea angling sector.

Annual landings of species in the FMP identifies that the most significant species in terms UK landings and value are cuttlefish where EU vessels landing of squid is the most valuable followed by cuttlefish. Cuttlefish, and increasingly squid, are important fisheries for both the inshore and offshore vessels so identifying benefits to the coastal communities is challenging.

Consultation so far with the recreational sea angling sector identifies that smoothound and turbot were the species that the sector wanted prioritising. The NQS FMP identifies that pout, john dory, lesser spotted dogfish, gurnards, smoothound, lemon sole, brill and turbot are key species for recreational anglers. Many anglers catch pout, lesser spotted dogfish and gurnards but they are normally taken as a bycatch to the target species, such as bass, pollack and rays. The value and interest in the recreational squid fishery continue to increase and this is likely to become a priority NQS for recreational anglers.

Other FMPs provide more scope to include and develop recreational fishing interests than the NQS FMP. Angling is not the only recreational fishing activity of note as recognised by D&S IFCA's permit byelaws but the relevance of all these recreational activities to the NQS FMP is still relatively low. Improving how all fish and shellfish is handled and released is important for both recreational and the commercial sectors.

Smaller gurnards, bib, lesser spotted dogfish and smoothounds are landed as bycatch and used mainly as bait and required to retain on boards to meet other legal obligations, for example retention of bass on a trawler is limited to 5% of the overall catch onboard.

Goal 4: Develop on partnership working to build capacity for the industry to be able to input into matters affecting NQS fisheries management by formally establish a Channel demersal NQS management group to allow for continued engagement in ongoing management of NQS fisheries.

The proposal to create a management group is supported as the FMP sets out that a lot of work is needed to better inform future iterations of the plan. The formation of a management group is consistent with the other front runner FMPs. There is a real risk that there will be participation fatigue if meaningful developments are not achieved and whether sufficient financial support will be provided in the medium to long-term. IFCA funding to support development of the FMPs has not been identified beyond 2023/24.

Goal 5: Better understand the wider non-quota species evidence gaps and develop the evidence base

Various data gaps are identified and proposals are set out on how evidence shall be gathered and analysed.

In the medium to long term, the use of technology to obtain the required data is identified. Gathering evidence from on board the vessels to better understand the composition of the catches taken is the only way to improve significantly the quality and quantity of data generated.