

Bass Draft Fisheries Management Plan (FMP)

Summary of the Bass FMP

The Bass draft FMP has been prepared for the purpose of meeting the requirements set out in the Fisheries Act. The plan has been developed by the Department for Environment, Food and Rural Affairs (Defra) and Welsh government, in collaboration with scientists, regulators, Statutory Nature Conservation Bodies) and recreational and commercial fishing sectors to deliver a roadmap for the long-term sustainable management of bass fisheries in English and Welsh waters over the next six years.

The Bass FMP was prioritised as the management of bass is of interest to both the commercial and recreational sectors. It is estimated that the recreational sector is responsible for 27% of the total fishing mortality, catch taken and mortality of released fish.

UK and EU vessels have accessed bass as a non quota species, however unlike many other non quota species, the bass fishery is already subject to considerable management of both commercial and recreational fishing. Prior to 2015, bass management included the designation of many estuaries as Bass Nursery Areas (BNAs) and additional restrictions on netting and the application of a minimum size of 36cms in length. However, in 2015 a package of much wider sweeping measures were introduced to reflect the urgent scientific warnings of stock decline below estimated levels (Blim) to support recovery of the stock. The introduction of increased management reflected that high fishing pressure and poor recruitment had been responsible for the decline.

In terms of stock, limited recovery of the stock has been noted but the scientific data indicates that the stock is still below MSY B Trigger levels meaning that there is still an increased risk of recruitment failure to support the fishery. The FMP states that bass stocks have increased and are currently fished with in sustainable limits in line with ICES advice.

The consultation with the recreational and commercial sectors was undertaken by Defra's Policy Lab team. Policy Lab specialise in designing consultation and engagement to better understand the present situation and imagine the future and then design ways in which to achieve this. This approach meant that the current management approach was examined in detail and through engagement the effectiveness of the management was tested against the opinions of both commercial and recreational fishers.

Key Goals and Proposed Management Actions of the FMP

Goal 1 Inclusive stakeholder engagement structures to inform management of the bass fishery

Goal 2 Equitable access to the commercial bass fishery, while prioritising stock sustainability

Goal 3 Minimise discarding of bass bycatch where survival rates are low

Goal 4. Encourage and facilitate full compliance with bass regulations

Goal 5. Maximise the benefits of bass fishing for local coastal communities

Goal 6. Sustainable harvesting of the bass stock in line with scientific advice

Goal 7. Protecting juvenile and spawning bass

Goal 8. Minimise the impact of bass fishing on the wider marine ecosystem

Goal 9. Mitigate against and adapt to the impact of climate change on bass fishing

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

Goal 1: Establishment of bass management groups to facilitate stakeholder participation in management decisions.

Government wants to establish a formal bass management group to support future co-management of bass fisheries through a collaborate approach involving all interested sectors. It is important that such a group is established as the initial proposals in the Bass FMP set out the priority areas for review and consideration, but no specific proposed management measures have been identified. It is intended that an additional evidence sub-group would be established to ensure decision were grounded in science and evidence.

Goal 2: It is proposed that the current access arrangements to the bass fishery should be reviewed by initially tasking the proposed bass management group to review the existing management measures to inform a decision on whether to introduce alternative access arrangements. As a priority measures for early consideration include the current bass authorisation system and reference period and the timing and duration of the closed seasons.

A review of the current authorisation system is needed. Although there is evidence that the introduction of the current authorisation system has had the effect of reducing the overall landings of bass, the authorisation system has many weaknesses. The authorisation system did technically mean that there was only a hook and line (rod and line in most instances) directed fishery for bass. Other methods of capture, trawls, seines, fixed nets were technically only allowed to retain bass as an unavoidable bycatch. The reality is that fixed nets are used to directly target bass and the recent D&S IFCA prosecution identified that large amounts of bass was being transhipped at sea and landed as rod and line caught.

The priority is to consider equitable access to the commercial fishery. It is important that the review references section 25 of the Fisheries Act. Section 25 sets out what should be considered when distributing fishing opportunities. The priority is to address the commercial fishery requirements however it is recognised that the recreational fisheries are responsible for approximately 27% of fishing mortality and the recreational fishery contributes significantly to local economies. Although the relevant data in Annex 2 Evidence Statement is questionable and is explored in more detail in the report, based on the current reported importance of bass to the commercial sector, an argument could be made to prioritise the recreational fishery.

A review of the seasonal closures of both the commercial and recreational bass fisheries is needed. There have been adjustments to the seasonal closures, and it is generally recognised that the protection of the offshore spawning stock has been improved with the prohibition of directed pair trawling activities. Page 17 of Annex 2 suggests that inshore spawning and inshore aggregations of bass are important and there is evidence that the inshore aggregations of pre spawning bass are being caught by trawls and nets and results in increasing discarding or illegal retention of bass.

Goal 3: It is proposed that management measures should be reviewed to reduce the waste of dead bass and improve data collection to better manage discarding. Early consideration set out in the FMP include providing derogations to trawling vessel to exceed the current 5% bycatch limit per trip, to use the catch app to record discards and support the continuation of the REM Celtic Sea programme.

A review of the management of discarding is a priority. The highest profile response to concerns regarding discards and wasting of fish was the introduction of the Landing

Obligations. The introduction of this legislation demonstrated an intention to reduce discarding, but it has not been without its challenges and has had unintended consequences such as the removal of the 5% bycatch rule of quota species caught whilst scallop dredging. Ideally the best approach would be to minimise the opportunity for non-directed fisheries to catch the bass and then create better provisions to land genuine unavoidable bycatches of bass. The Celtic Sea REM programme is referenced and technology must ultimately have a key role in future fisheries management and in the short-term the roll out of IVMS may provide opportunities to explore the greater use of real time closures across the towed gear sector similar to north sea cod real time closures. Given the reported fishing mortality of the recreational bass fishery, promotion of lure fishing or use of circle hooks when using bait could have a significant benefit and with little loss of fishing opportunities. The reliance on reporting via the catch app is questionable as there is no independent way of verifying the reports and there may lead to over or under reported bycatches.

Goal 4: Ensure compliance with bass regulations. A consistent message from the consultation was that better monitoring and enforcement of the existing management measure by the MMO and IFCA's was needed. The theme for early intervention was to improve communication and available guidance.

The short-term approach seems mainly to improve compliance through fishers better understanding of the regulations with emphasis on the recreational sector. Signage is always helpful where it can be installed but care is needed to maintain the accuracy of the information. Until recently there was signage within D&S IFCA's District referring to the maximum landing of three bass per recreational angler per day. In addition to information dissemination there needs to be an effective enforcement approach to deter fishers from circumventing the rules. It is questionable why this critical aspect of any management approach is only referred to in the medium to long-term. Policy Lab's consultation suggested that many within the fishing sectors wanted more effective enforcement as soon as possible. To support more effective enforcement, immediate action to address the key loopholes in legislation should be prioritised including those set out in the medium to long term actions of the draft FMP.

Goal 5: Bass is particularly important to inshore fishers due to its high market prices, appealing fishing experience for recreational sea fishers and historical legacy for English and Welsh coastal communities. If managed appropriately, bass fishing therefore has the potential to generate substantial social and economic benefits for local coastal communities.

The above statement is lifted directly from the proposed FMP, yet the evidence statement minimises the importance to the commercial fishery. On page 12 of the Evidence Statement the document sets out that over the last six years only eight to nine commercial vessels were dependent on bass landing for more than 20% of the owner's income and the owners of only between two and six vessels rely on bass for more than 60% of their fishing income. Officers understood that the majority of commercial vessels that use rod and line as the main method of fishing rely on bass for the majority of their income, this number is far higher than the report suggests. Rod and line vessels usually target bass during the summer and autumn and pollack during the rest of the year. The decline in pollack stocks and the recently introduced MCA restriction on the distance from shore that under 8m vessels can operate mean that the reliance on bass landings is likely to increase in future years.

To complicate the assessment of the reliance on bass, at page 9 ,the evidence statement sets out that the higher price attained by rod and line caught bass was approximately £10/kg (between 2016 and 2021). Whereas on page 13 the report suggests bass prices have been between £40 and £70 per kg. Page 15 of the report suggests that only four Full Time Equivalent employees (FTE) were associated with vessels landing bass other than the Southwest beamer fleet and u15m scallop dredging fleet.

It is correct that many smaller vessel fishers also have alternative employment ashore but fishing with rod and line generally requires more crew than other forms of fishing and collectively the FTE of these fishers will be considerably higher than four FTEs. At the Southwest RFG meetings there is a standing request to review the current limitations on landing to allow small scale fishers to land a small quantity of bass because of its importance to their potential overall income. For example, the owners of vessels without nationally administered Shellfish Entitlement are permitted to land up to 5 lobsters and 25 crabs per day.

It should be noted that bass is targeted by the recreational sector for sport and consumption. The high value of bass and the availability of improved tackle and technology (sounder etc) means that large catches can be achieved by unlicensed anglers and the temptation is to push surplus bass into the public food chain.

A common theme to all the front runner FMPs is the reference to 'Coastal Communities'. It is important that coastal communities are better defined so that it can differentiate between the needs of small scale and large-scale fishing ports and geographical recreational interests. For example, the recent MMO commissioned review of the dover sole fishery in Lyme Bay identified the various port dependencies on sole and where the main recreational fishery takes place. A similar approach to bass may provide a much better understanding of the relative importance to each coastal community around England and Wales.

Goal 6: The primary aim of FMPs is to ensure that the stocks in scope are harvested sustainably. Since the introduction of the current management approach in 2015, harvesting of the bass stock has been maintained within sustainable limits aligned with ICES advice. In future, it may be possible to build on this foundation to enhance the potential benefits from bass fishing by exploring alternative harvest strategies in line with other FMP goals.

The evidence statement sets out that a limited recovery of the stock has been noted but the scientific data indicates that the stock is still below MSY B Trigger levels meaning that there is still an increased risk of recruitment failure to support the fishery. The FMP states that bass stocks have increased and are currently fished within sustainable limits in line with ICES advice. However, the stocks are considerably lower than historical levels and further recovery of the stocks well above MSY B Trigger level should be achieved if the bass fishery is to be recognised as 'world class'. The medium to long-term strategy acknowledges this point.

Goal 7: Although the bass stock has shown signs of recovery in recent years, spawning stock biomass (SSB) and the recruitment of juveniles remains a concern. Effective protection of the spawning and juvenile bass stock will enable the stock to replenish most efficiently.

The above rationale recognises that there is much more to do to support the recovery of the bass stocks and that protection of the juvenile and spawning bass is a priority. With variable recruitment, maximising the number of juvenile bass entering the fishery is key and avoiding the adult stock during spawning or pre-spawning aggregations is important too. However, the FMP short-term approach is to gather more evidence. Some of the medium to long-term considerations could be introduced earlier. For example, fixed and drift netting is now prohibited in all South West estuaries (Cornwall and D&S IFCA's District) and could be extended to all BNAs in England and Wales.

Goal 8.1: The focus on minimising the impact of the bass fishery on the wider ecosystem is to reduce the bycatch of endangered, threatened, and protected species. The FMP

highlights the risk of nets to seabirds, marine mammals, elasmobranchs, turtles, and migratory fish.

The short-term considerations include allowing fishers with authorisations to use fixed nets for bass to switch to using hook and line gears as these have a much lower incident of bycatch of many of the species listed above. This approach would also be consistent with Section 25 of the Fisheries Act 2025.

Medium to long-term proposals include reviewing the practice of shallow inshore and shore-based netting to determine whether additional regional or national protections are needed to prevent migratory fish bycatch. D&S IFCA is currently reviewing its management of netting, including coastal netting.

Goal 8.2: Reduce impacts of gear on seabed integrity by minimising the impact of fishing gear on seabed integrity and benthic habitats.

The FMP proposes to maintain current restrictions on targeted trawling and netting of bass as part of a continued shift towards lower impact gears. If stopping the targeting of bass continues to be the approach of the FMP, then the current restrictions need to be reviewed as there is clear evidence that bass is being targeted by netting in particular.

Goal 8.3: Reduce contribution of bass fishing to marine litter. Abandoned, lost, or discarded fishing gear is associated with sensitive species entanglements and ghost fishing.

D&S IFCA is looking at whether to consult on introducing a management measure to address the issue of abandoned nets.

Goal 9: Mitigate against and adapt to the impact of climate change on bass fishing.

The focus is to undertake research into the possible effects of climate change on the bass fishery. There is also recognition that an increased biomass could contribute to improved blue carbon ocean storage.