



Hand Working Fishing Activity

Have Your Say

The Development of Bag Limits for Recreational Fishers

What's the purpose of this information gathering exercise?

D&S IFCA is inviting you to have your say on the establishment of bag limits (catch restrictions) that will form part of a new Hand Working Permit Byelaw that is being developed in 2020 by D&S IFCA.

Your view is important, and we encourage you to forward this information if you know others that may have an interest.

- **The information gathering exercise ends on Monday 9th March 2020.**

We are directly contacting everyone on our mailing list and are giving you options on how to respond. All stakeholders can respond even if they don't conduct the different hand working fishing methods that are used to take different sea fisheries resources.

This information circular includes proposals, five questions, links (if reading in electronic format) to further information and explains how you can participate in the process. This information gathering exercise is based around a series of proposed bag limits that are set out after some background information.

Background Information – The Development of a Hand Working Permit Byelaw

D&S IFCA must manage the exploitation of sea fisheries resources within its District. This is specified within the Marine & Coastal Access Act 2009. 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 which include the following

- Bait pumping
- Hand gathering of mussels, cockles, clams, winkles, limpets, and other molluscan species
- Raking for cockles and clams
- Hooking for crab and lobster
- Prawning with hand net
- Salting for razor shells
- Seaweed harvesting
- Drop netting

It was concluded by the D&S IFCA Byelaw and Permitting Sub-Committee that a new Hand Working Permit Byelaw should be created. The new Hand Working Permit Byelaw will take time to develop and information, such as the findings from this exercise, will help to inform decision making and the drafting of the Byelaw.

How will the Byelaw Work?

The Byelaw (if implemented) will apply to the whole D&S IFCA District and will enable D&S IFCA to manage hand working fishing methods in a new way. The needs of commercial fishers and recreational fishers are different, and this will be reflected in the restrictions that will apply.

Commercial Fishers

The Byelaw will enable D&S IFCA to issue permits to commercial fishers. The criteria needed to gain a commercial permit is yet to be developed. The flexible permit conditions will contain catch, gear, spatial and time restrictions that will be appropriate for commercial fishing activity. This information gathering exercise is not to try and inform the development of restrictions for commercial fishers.

Recreational Fishers

Recreational fishers won't need a permit. Instead of a permit, fixed provisions (rules & regulations) will be set out in the overarching byelaw. Fixed spatial provisions (closed areas/sites) will help to protect features such as seagrass. A series of catch limits (bag limits) for different species (sea fisheries resources) that are targeted by different types of hand working fishing methods will also be introduced. The proposed bag limits for personal use are set out in this information circular. It will be illegal for recreational fishers to sell their catch.

Question 1: Your Interests

What interest do you have regarding the setting of bag limits for recreational fishers conducting crab tiling, bait digging or hand gathering fishing methods?

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Bag Limits

The following information highlights the proposed bag limits that would apply to recreational fishers conducting crab tiling, bait digging or other defined hand gathering fishing methods. The rationale for the setting of the bag limits is also set out.

Proposal - Species/Resource Group A

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

Rationale: Levels for Crab, Lobster and Scallops

The importance of these species which are of relatively high value, and desirable as a food source, has been recognised in the type of management already introduced by D&S IFCA. These species are typically targeted by diving, potting and netting and the scale of these fishing activities and their relative efficiency to remove these species has led to the introduction of tailored permit conditions issued under the Diving, Netting and Potting Permit Byelaws. Conditions of use have recognised the needs of different user groups that target them via those activities. Within the other D&S IFCA Permit Byelaws, bag limits for recreational fishers are set at a combined daily total of three crabs from the species of brown crab and spider crab. Notwithstanding specific spatial restrictions for the removal of spiny lobster, up to two lobsters from the species of lobster and spiny lobster can be taken per calendar day. Following

consultation and the issue of revised diving permits in 2019, a total of 25 scallops can now be taken by recreational divers operating under a permit.

The Hand Working Permit Byelaw is a different byelaw model. Management via flexible permit conditions is obviously different to the threshold approach which will be fixed provisions within the Hand Working Permit Byelaw. Reduced bag limit levels for those conducting hand working activities (in this case hand gathering) with no permits as compared to those fishers managed via a permitting model is not discriminatory, rather it reflects a different approach that may be considered less burdensome on non-commercial hand collectors.

Although it is more pre-cautionary in its approach, it reflects the reduced level of management directed towards the fishing activity and those conducting it. It is thought to be unlikely that greater numbers of these species would either be available to collect or would be actively targeted for collection each day by those conducting hand gathering activity on a non-commercial basis as compared to non-commercial potting, diving or netting.

Question 2: Group A Species/Resource

What level of bag limit do you suggest for species/resource group (A) as set out in the table and what are your reasons?

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Proposal - Species/Resource Group B

Species/Resource	Level (per calendar day)	Initial 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

Mussels

Research would suggest that the average amount of mussel required for a single serving is 500g. It is the view of D&S IFCA that 1kg of mussels would be enough per person as a bag limit.

Cockles

Research would suggest that the weight of cockles required for a single serving is between 250g 300g. It is the view of D&S IFCA that a 1kg bag limit of cockles would be enough per person as a bag limit.

Question 3: Group B Species/Resource

What level of bag limit do you suggest for species/resource group (B) as set out in the table and what are your reasons?

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Proposal - Species/Resource Group C

Species/Resource	Level (per calendar day)	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.

Question 4: Species/Resource Group C

What level of bag limit do you suggest for species group (C) as set out in the table and what are your reasons?

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Other Information

We will collate the information you provide, and this may help our Byelaw and Permitting Sub-Committee (B&PSC) in their decision making. The findings of the bag limit consultation will be discussed by the B&PSC in May 2020. More drafting work is required, but it is expected that a completed draft Hand Working Permit Byelaw will be completed by July 2020. It will then be subjected to a six-week formal consultation. The Hand Working Permit Byelaw would need confirmation by Defra before coming into force.

Question 5: Other Information

Do you have any comments on the proposals or the development of the Hand Working Permit Byelaw?

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How you can have your say

You have several options to choose from:

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)

Visit us:

Devon and Severn IFCA
Brixham Laboratory,
Freshwater Quarry,
Brixham,
TQ5 8BA.

Phone us:

01803 854648

- **This information gathering exercise ends on 9th March 2020.**

Further Information

Further detail about our byelaw review and the work conducted by our Byelaw & Permitting Sub-Committee can be found in our [guide](#) that is posted on the D&S IFCA website or available upon request.

Reports presented to and discussed by the Byelaw and Permitting Sub-Committee can be found on the D&S IFCA website in the [Resource Library](#) or are available upon request. The [Meetings Tab](#) of the D&S IFCA website is also used to post information relevant to the most recent meetings.

The Managing Hand Working Fishing Activity - Options for Management – report (25th October 2019) can be read [here](#).

Minutes of Byelaw and Permitting Sub-Committee meetings can be found on the D&S IFCA website in the [Resource Library](#) or available upon request.

How to follow our work?

If you are not already on our mailing list, then you can get yourself added by [contacting D&S IFCA](#) or by using this [link](#). You will then be directly notified of all our consultations. You will also receive our free e-newsletter.

Keep an eye on our [consultation page](#) on our website to read about this and other work being done and how you can get involved and have your say.

Follow our [latest news items](#) displayed on our website or our face book page.

Explore our website [Resource Library](#) for an extensive range of our information and publications. It's all free.

What do we do with your information – Privacy Policy

We protect any personal data that you may provide. Any personal data submitted in this information collecting process will not be shared with others. The content of responses will be summarised and anonymised where appropriate for documenting in reports that will be presented to the Byelaw & Permitting Sub-Committee and published on our website.

D&S IFCA has a privacy policy which can be found by visiting our website (home page) www.devonandsevernifca.gov.uk

- You can change your preferences at any time.
- We have a duty to consult with D&S IFCA Permit Holders.

You can manage your preferences by contacting D&S IFCA.