



Potting Permit Byelaw Permit Conditions

Proposals to Amend the Potting Permit Conditions
to Manage the Live Wrasse Pot Fishery

A Report on the Formal Consultation

22nd May 2020

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Part 1

1. Aim of the Report & Content

This report (22nd 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 should be used as reference material and read in conjunction with a separate resolution paper that officers have prepared for members to discuss prior to their decision making.

This report documents summarised and anonymised information from The Formal Consultation – Amendments to the Permit Conditions to Manage the Live Wrasse Pot Fishery (April 2020) that ended on 15th May 2020 and is divided into two sections.

Part One of the report provides background information to explain why the consultation was conducted and how it was conducted. Part Two of the report focusses on the findings from relatively small consultation response which includes mixed opinions provided by those individuals and organisations that did engage in the formal consultation. The 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. Process

As with any potential change to flexible permit conditions, a process must be followed as set out in the respective overarching permit byelaw.

The process includes consultation with permit holders, organisations and persons as appear to the Authority to be representative of the interests likely to be substantially affected by the proposed future management options.

Dependent on the decision making of members, the Potting Permit Conditions will be amended and circulated free of charge.

3. Background Information & Decision Making

On the 11th of February 2020, as part of the formal review of the Live Wrasse Pot Fishery, D&S IFCA's Byelaw and Permitting Sub-Committee (B&PSC) examined a detailed report. The Three-Year Comprehensive Review of the Live Wrasse Fishery (version 1.3), set out detailed information about D&S IFCA's on-going research and a series of recommendations relating to the management of the fishery.

Two of the key conclusions, relevant to the formal consultation, were as follows:

- 1) To continue to manage the fishery as outlined in the D&S IFCA's Policy Statement and Potting Permit Conditions for the Live Wrasse Fishery (1st August 2018), except in the case of rock cook wrasse (2, below)
- 2) In the case of rock cook, all catch should be returned to the sea. Retention of rock cook on board for landing, transportation and/or sale should be prevented via an update to D&S IFCA's Potting Permit Byelaw Permit Conditions, and this change communicated to fishers and salmon farm agents to encourage compliance.

Regarding the future of the Live Wrasse Pot Fishery, members of the B&PSC proposed and agreed the following:

That D&S IFCA continues to manage the Live Wrasse Pot Fishery using permit restrictions and the continuation of the Fully Documented Fishery (research), whilst having regard to changes in permit conditions relating to rock cook wrasse.

That the Potting Permit Conditions are to be examined by the BTWG and amended in such a way as to require all rock cook wrasse to be returned to the sea.

4. Drafting of Amended Potting Permit Conditions

Officers were able to prepare draft Potting Permit Conditions to recognise the expectations of the B&PSC to afford additional protection to rock cook wrasse, without the need of a full Byelaw Technical Working Group meeting.

The drafting work included:

1. Adding rock cook wrasse to an established list of species within the Potting Permit Conditions that are prohibited for removal from a fishery within the D&S IFCA District.
2. Recognising that the minimum and maximum size of rock cook as set out in the Permit Condition 2.6.2 (specific to those engaged in the live wrasse fishery) would no longer be applicable.

Other changes & Impact

It was recognised during drafting work, that the opportunity existed to amend some other wording within the current [Potting Permit Conditions \(Version control August 2019\)](#) which relates to the Minimum Conservation Reference Sizes (MCRS) as set out within paragraph 1.3. The explanation of how to measure a marine organism is linked to paragraph 1.3.2 which specifies Annex XIII Article 18(1) of Council Regulation (EC) 850/98. This EU legislation has changed.

Rather than changing the provision to link to amended legislation, officers recognised the potential to introduce a more user-friendly schedule to the Permit Conditions, with diagrams to help fishers understand how to measure different species that are regulated by the Permit Conditions. This was explained in the consultation and formed one of the three proposals.

The changes to the Permit Conditions, in the way they are drafted, have a potential impact to all fishers using pots and not solely those commercial fishers that participate in the Live Wrasse Pot Fishery. The potential prohibition on the removal of rock cook wrasse would apply to all fishers with a Potting Permit. This potential impact was explained in the consultation.

5. How the Consultation was Conducted

The Formal Consultation – Amendments to the Permit Conditions to Manage the Live Wrasse Pot Fishery (April 2020) highlighted background information and demonstrated the proposed wording for amendments within the Potting Permit Conditions. A key aim of the exercise was to provide the opportunity for feedback on the specific proposals that could be summarised and assist with further decision making of the B&PSC.

Electronic engagement formed the basis of formal consultation, and a Mail Chimp circular was sent directly to all those on the D&S IFCA consultation mailing list. Due to the Covid-19 virus and the restricted working arrangements at the time for D&S IFCA Officers, information was not sent in hard copy format to any permit holder that had only provided a postal address. Unlike other consultation work, the opportunity for stakeholders to visit the office and engage in one to one discussion with officers was also not an option that was deemed appropriate or possible due to Covid-19.


Recipients of the direct notification (via email) were encouraged to forward the information or notify others that may have an interest about the consultation.

Other Communication

D&S IFCA's website was used to support the formal consultation with information posted on the Consultation display page. News/Information items were also prepared and posted on the website and D&S IFCA's Facebook page. Options were provided to submit a response including a dedicated email address: Consultation@devonandsevernifca.gov.uk

Links to Consultation Information:

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



Potting Permit Conditions

Formal Consultation

Amendments to the Permit Conditions to Manage the Live Wrasse Pot Fishery

What's the purpose of this Formal Consultation?

D&S IFCA is inviting you to respond to the formal consultation on proposed amendments to existing Potting Permit Conditions that are used to manage the Live Wrasse Pot Fishery.

- The information gathering exercise ends on Friday 15th May 2020.

We are directly contacting everyone on our (email) mailing list and are giving you options on how to respond. Due to the Covid-19 virus and our current working arrangements, we are not able to send this information directly to any permit holder that has only provided a postal address. Your view is important, and we encourage you to forward this information or notify others that may have an interest about the consultation.

- Information is posted on the D&S IFCA's website to support this direct email notification

<https://www.devonandsevernifca.gov.uk/Consultation>

All stakeholders can respond even if they do not conduct commercial potting for live wrasse within the D&S IFCA's District. The proposed changes relate to all potting permits.

This is not a long questionnaire. This information circular demonstrates why D&S IFCA proposes to amend the existing Potting Permit Conditions and how this will be achieved. This circular explains how you and others can participate in the process and provides some background information including some embedded information (hyperlinks).

Background Information – The Live Wrasse Pot Fishery

Fishing with pots for live wrasse is highly regulated in the D&S IFCA's District and can only be conducted by commercial fishers. A total of 480 pots (that must be tagged) are authorised to be used within the entire D&S IFCA's District to catch live wrasse that are used as cleaner fish in salmon farms. Additional commercial fishers, with a potting permit, have an opportunity to join the fishery; however, this would trigger a review of the Potting Permit Conditions to determine how to divide the total effort.

The activity is restricted to an area of the D&S IFCA's District in and around Plymouth Sound. The tags are currently divided between four commercial fishing vessels (maximum of 120 tags each) that meet the required criteria to engage in the Live Wrasse Pot Fishery.

Currently, the Permit conditions include a closed fishing season (1st May to 15th July inclusive), gear marking and minimum and maximum size restrictions for five species of wrasse. In addition to permit conditions, under Paragraph 17 of the Potting Permit Byelaw, fishers must supply landing data to D&S IFCA and allow D&S IFCA Officers to conduct on board observations. Voluntary measures also contribute to the management of the fishery.

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16th April 2020

16th April 2020

Devon and Severn IFCA News

Formal Consultation – Potting Permit Conditions

D&S IFCA is inviting you to respond to the formal consultation on proposed amendments to existing Potting Permit Conditions that are used to manage the Live Wrasse Pot Fishery.



A formal consultation on proposals to amend the existing Potting Permit Conditions has begun. D&S IFCA is contacting everyone on its (email) mailing list with a circular that provides more detail and links to additional information and has posted information on its website [consultation page](#).

The proposed changes relate to all potting permits.

All stakeholders can respond even if they do not conduct commercial potting for live wrasse within the D&S IFCA's District. The consultation will end on 15th May 2020.

The Proposed Changes to the Potting Permit Conditions

There are three proposed changes to the Potting Permit Conditions which are summarised as follows:

1. To prohibit the removal from the fishery of any rock cook wrasse
2. To remove the provision in the Potting Permit (2.6.2) that relates to the minimum and maximum size of rock cook as this will no longer be applicable due to the first proposal.
3. To introduce a new schedule to the Permit Conditions, with diagrams to help fishers understand how to measure different species that are regulated by the Permit Conditions.

Why are these changes being proposed?

Fishing with pots for live wrasse is highly regulated in the D&S IFCA's District and can only be conducted by commercial fishers. A total of 480 pots (that must be tagged) are authorised to be used within the entire D&S IFCA's District to catch live wrasse that are used as cleaner fish in salmon farms. The activity is restricted to an area of the D&S IFCA's District in and around Plymouth Sound. Currently, the [Potting Permit Conditions](#) contain a range of restrictions to manage the Live Wrasse Pot Fishery and these conditions are supported by [voluntary measures](#).

Part 2: The Consultation Response

6. Summary

The response to the formal consultation was small and 11 responses were received by Friday 15th May 2020. Auto reply responses have been excluded. The response mainly consisted of those submitted by organisations, rather than individuals and none of these were Potting Permit holders.

The majority of responses indicated that they are supportive of the proposals, but not necessarily supportive of the continuation of the Live Wrasse Pot Fishery.

Devon Wildlife Trust, the Angling Trust (Wyvern Region), two angling clubs, the Wembury Advisory Group and Wembury Parish Council all indicated that it would be their preferred option if the fishery was further restricted or prohibited.

Other than the Devon Wildlife Trust, none of the responses recognised the other proposals including the intention to introduce a schedule to the Permit Conditions to explain how species should be measured.

A couple of the responses were simple messages of support and one response was non-committal on the proposals but did question the basis of sustainability and requested further information on the subject matter and how the Live Wrasse Fishery is enforced.

7. Who Responded?

Category	Number of Responses
Individually Crafted Responses	5
Sea Angling Clubs/Angling Trust	3
Other Organisations (Conservation)	3
Total	11

Organisations:

1. Devon Wildlife Trust
2. Wembury Advisory Group
3. Wembury Parish Council
4. Angling Trust Wyvern Region
5. Honiton Sea Angling Trust
6. DOE Sea Angling Club (Plymouth)

8. Opposition to the Fishery

A common theme within the responses was a desire to see the Live Wrasse Fishery further restricted or prohibited. The angling sector have found it surprising that the fishery is considered by D&S IFCA to be sustainable and, only if it is to continue, would welcome on-going research. It has been highlighted that wrasse, in particular ballan wrasse, are a good sport fish and also an important starter fish for many junior anglers that fish on a catch and release basis. Commercial fishing and a reduction of wrasse in the Plymouth area is, in their view, negatively impacting on recreational angling and there are fears by some that stock levels could deteriorate in a similar way to those experienced for bass.

Responses offered by organisations with a strong conservation interest were more detailed and favoured restrictions beyond those proposed in the formal consultation. Wembury Parish Council and the Wembury Advisory Group provided the same consultation response as follows:

1. *A significant proportion of the fishery occurs within the Marine Conservation Area and all of it is very close.*
2. *We are concerned that the removal of large numbers of fish that are territorial and of great ecological importance will damage the Marine Conservation Area.*

We wish to make the following points:

1. *We welcome IFCA's use of monitoring data to review and amend permit conditions in this way.*
2. *We welcome protection of rock cooks and therefore support the proposed changes.*
3. *Nevertheless, we continue to have serious concerns about the wrasse fishery because:*
 - *It targets territorial fish and can therefore strip them from particular areas*
 - *Wrasse are of great ecological importance, in food webs and as cleaners of parasites from other fish*
 - *There are serious animal welfare issues associated with capture and long-distance transport of live, sentient vertebrates*
 - *As noted in the fishery report, for such territorial species there is a risk that small scale adjustments to potting positions by fishers can misleadingly maintain Catch per Unit Effort results and mask real declines in wrasse numbers*
 - *Several local divers have reported seeing fewer wrasse than they have been accustomed to in fished areas over recent years*
 - *Several local divers and snorkelers (including myself) have noted an increase in fish lice infestation on wrasse and other fish such as pollack in the relevant areas over recent years*
 - *We are concerned that rock cooks could be early indicators of what will soon happen to other wrasse species*
 - *Of its impact on non-target species combined with the lack of data on bycatch. Pots seen underwater have contained significant numbers of territorial fish such as blennies and sea scorpions. Even if these are returned, they may, by then, have lost territories, nests, eggs etc*
 - *As noted in the fishery report, one of the four fishers failed to return any landings data. This is in contravention of permit conditions and would therefore be expected to result in permit withdrawal.*

Devon Wildlife Trust

This organisation provided a very detailed response. Although supportive of the proposals, this was not without a caveat. It was evident that the Three-Year Comprehensive Review of the Live Wrasse Fishery Report had been studied in detail by Devon Wildlife Trust (DWT) and their response questioned elements of the findings. The response has been transcribed as follows:

2a: To prohibit the removal from the fishery of any rock cook wrasse

We fully support the prohibition on removal of this species from the fishery. However, we have concerns over the method of doing this. There is little understanding on the mortality rates for returned fish, which means that simply returning unwanted catch may only have limited impact on this species. We agree with the 3-year review that a Code of Conduct (CoC) around method of return is essential, although we feel this needs to be mandatory as there are concerns around compliance with the voluntary measures that have been used for this fishery. In addition to the CoC we advocate removing from the fishery areas where catch composition includes a high proportion of rock cook – particularly squares O15 and O16 (Figure 34).

2b: To remove the provision in the Potting Permit (2.6.2) that relates to the minimum and maximum size of rock cook as this will no longer be applicable due to the first proposal.

We support this proposal.

2c: To introduce a new schedule to the Permit Conditions, with diagrams to help fishers understand how to measure different species that are regulated by the Permit Conditions.

We support this proposal.

Question 3: If you do not support the proposed changes, please set out your reasons?

N/A

The consultation provided an opportunity for further comments and DWT provided many as follows:

Precautionary Principle

Devon Wildlife Trust has repeatedly asked that the precautionary principle be followed regarding this fishery due to the lack of understanding around wrasse populations and ecological impacts of large-scale wrasse removal. The 3-year review adds further weight to the arguments for at least a moratorium of this fishery while questions are answered. The 3-year review states:

*“Understanding how CPUE and LPUE relate to abundance is extremely difficult in this fishery both overall and on a species-by-species basis, in part because the association of wrasse with reef habitat may result in a complex relationship between fisher behaviour and stock dynamics (Ross 2016). **It may, therefore, be difficult to identify unsustainable fishing practices underlying apparently stable CPUE patterns.** For example, the CPUE may remain high despite an overall reduction in the wrasse population, because fishers move from reef to reef to maintain catch levels. This is known as hyperstability”.*

This is the clearest argument yet for a closure of this fishery using the precautionary principle. Until a wider ecological understanding of wrasse in this area can inform how CPUE and LPUE can be used to monitor wrasse populations (and therefore any potential declines), this fishery cannot be managed sustainably.

In addition, the following are specifically mentioned within the 3-year review as data that are needed but are not available, and are unlikely to become available due to a lack of resources:

- Mark-release-recapture studies to establish if CRS is an effective tool due to impacts of returned fish mortality
- Impacts of environmental drivers on local wrasse abundance
- Surveys to more accurately detect spawning activity
- Studies to assess whether this fishery is being sex-selective

While we recognise, value and support the D&S IFCA's considerable efforts to monitor this fishery, making it one of the most monitored fisheries in the UK, it is clear that the lack of key data may be hampering the ability to detect unsustainable practice and stock declines, with resulting wider ecological impacts within the Plymouth Sound and Estuaries MPA. If the fishery's unsustainability only becomes apparent once LPUE and/or CPUE are declining for a species – e.g. rock cook – it is likely to be too late, with a significant effect on the MPA potentially already having occurred. Hyperstability (at various scales) may be masking severe declines that are already occurring.

We welcome the IFCA's further effort and investment in establishing of a PhD to assess some wider impacts of the fishery, but with so many uncertainties around the sustainability of this fishery, we recommend it must be closed until these can be answered.

HRA

We have not assessed the detail of all the HRAs for this fishery but make the point that many of the comments in this letter echo those in Natural England's letter to the D&S IFCA (dated 21 February 2018 sent in response to the HRA submissions by D&S IFCA) and therefore raise concerns as to whether this fishery is breaching Habitats Regulations. The points around data and a fully monitored fishery are key to the HRA, as they are how NE is satisfied that the fishery is taking the precautionary principle. Dealing effectively with non-compliance is also clearly highlighted as is the effectiveness of the voluntary closed areas.

We would ask that Natural England review this report against their previous letter and review their position.

Non-compliance.

It is clear that one vessel has consistently been non-compliant with the byelaw requirement to enable a fully documented fishery by not supplying returns information over multiple years. This clearly puts this vessel in breach of the byelaw, as it has been consistently throughout the life of this fishery - and yet it appears from the 3-year review that no enforcement action has occurred. This is made worse by the figures showing that this vessel is responsible for 40% of the 2019 landings, leading to seriously impoverished evidence around this fishery.

It is essential that byelaws are rigorously enforced by the D&S IFCA to avoid the risks of undermining the purpose and success of this byelaw, and further non-compliance by other fishers. This non-compliance has also taken up considerable officer time in following up, time which is therefore not available for other duties.

This same vessel has not received observer surveys due to boat size, meaning that landings data are currently the only option for monitoring 40% of this fishery. It is essential that a clear message is sent out by the D&S IFCA and we would strongly recommend that, where there is consistent and ongoing non-compliance, revoking the potting permit for this fishery (for this fisher/vessel) is considered.

There is clearly a need for alternative methods of observation where boats are too small e.g. chest cameras and iVMS. Such options should be investigated to enable better monitoring and use of D&S IFCA officer time.

Lack of data

The justification originally given for this fishery proceeding - when there were and are so many questions around sustainability and so little understanding about wrasse in Plymouth Sound - was that it would be a fully monitored and documented fishery. This was the D&S IFCA's approach to the precautionary principle. While we recognise the considerable effort of the D&S IFCA in pursuing this, it is apparent that this has not been achieved.

The following demonstrate this lack of data:

- Vessel 3 provided no landings data to the D&S IFCA. Vessel 3 represents 40% of landings (from MMO transport data) for this fishery in 2019 and has consistently failed to supply data throughout the fishery. This means the evidence is impoverished and introduces risk of errors for 2019 and for any trends over the life of the fishery.
- There are clearly discrepancies between landings data supplied to the D&S IFCA and the transport data supplied to the MMO (Table 2 versus Table 3), with either lack of recording or under-recording by all but one vessel in the landing data supplied to the D&S IFCA. As above, this casts doubt over the conclusions derived from the incomplete D&S IFCA dataset.
- The target of observing 12% of the fishery has been substantially missed. One vessel (Vessel 3) received no observations, while another vessel (Vessel 2) received only 2 observations (of 47 days fished). While there is no data on number of days fishing for Vessel 3, these two vessels represent 68% of the landings (from MMO transport data) for this fishery. This means that more than two-thirds of the fishery received only two observations. The remaining two vessels (representing 32% of landings) did reach the target of 12%.
- The 3-year review does not include data for Cornwall IFCA and suggests there is no data available for CIFCA waters for 2019. This leaves one side of Plymouth Sound vulnerable to being 'fished-out' while undetected, with impacts on the whole system on both sides of the Sound.

These represent critical data deficiencies and, with LPUE and CPUE being derived from these data, it is impossible to obtain accurate results by year or for the life of the fishery. This means that the fishery is not fully monitored and documented and so the justification for this 'fully documented' fishery cannot be supported.

Conclusions drawn from this data must be treated with caution and have appropriate caveats. Suggesting that "*catch and landings are sustainable for most species*" are not based on complete data and so may be inaccurate. Indeed, the data does not wholly support this conclusion (e.g. Figure 33).

DWT welcomes the PhD study that has started investigating some wider effects of this fishery (e.g. sea temperature, and catch data), but it is critical that impacts of this fishery on the wider ecology are studied. Anecdotal diver reports suggest a reduction in sightings of wrasse in fished areas, together with an increase in fish lice infestations seen on wrasse and other fish species. With Plymouth Sound designated as a SAC, the potential of large-scale alteration of ecosystems must be assessed.

Returns mortality and related effectiveness of CRS

It is noticeable that, for the whole fishery, the CPUE average is approx. 1.5 (Figure 3) while the LPUE average is approx. 0.7 (Figure 2), meaning approximately half the catch is returned. Broken down by species this is:

- Ballan – 38% returned
- Goldsinny – 74% returned
- Rock Cook – 79% returned
- Corkwing – 80% returned
- Cuckoo – 100% returned

The 3-year review highlights the case of rock cook - *“therefore, the cause of reductions in rock cook LPUE(fc) and CPUE is currently unclear. **The mortality of wrasse caught but returned to sea is not yet known**, though mark-release-recapture surveys may aid the understanding of this”*. It is very concerning that such a large proportion of the catch is returned as part of conservation measures for this fishery and yet the effectiveness of returning wrasse as a conservation measure has not been assessed.

It is important to understand the level of mortality for returned wrasse. The CRS is a key measure in protecting wrasse populations in this fishery, but if returned fish have high mortality, this would undermine the effectiveness of this measure. It is essential that a study is carried out to understand returns mortality in wrasse if the CRS measure is to continue.

As mortality is unknown, as a minimum, we recommend that further measures are put in place. We agree with the 3-year review that a Code of Conduct (CoC) around method of return is essential, although we believe this needs to be mandatory as there are concerns around compliance with the voluntary measures that have been used for this fishery. For controls on specific species, in addition to the CoC, we advocate removing from the fishery areas where catch composition includes a high proportion of that species (e.g. for rock cook squares O15 and O16).

Having identified a significant knowledge gap, we do not believe it is helpful to infer that catch and release would not be associated with high mortality (e.g. *“it appears unlikely that simple catch and release would be associated with high mortality”*).

In addition, the observed numbers of goldsinny within the CRS has declined considerably – 7% of overall catch, but this represents a 26% decline of goldsinny within the CRS. This represents a loss of larger individuals from the population. This could impact on future population dynamics and the wider ecological impacts are not understood.

Reduction in fishing effort

There is no explanation regarding why effort decreased by two thirds from 2017 to 2018 (with this lower effort continued in 2019). This effort decrease is mirrored in the landings data from the MMO - while there were 17,537 fish landed in 2019, this is a third of the 46,497 landed in 2017. It would be helpful to understand if the reduction was driven by demand or supply.

There is a considerable discrepancy between the effort figures in terms of days fished from observer data (362 in 2017, 116 in 2019) which shows a reduction in effort of 68% and that of pot hauls from wider data (4,322 in 2017, 2,334 in 2019) which shows a reduction in effort of approx. 54%. The latter figure would be alarming if accurate, as effort has halved while landings have reduced by 62% suggesting a fall in catch. Once again, this figure for effort does not include Vessel 3 while the landings (MMO) figure does, meaning the situation could be significantly worse.

Spawning/closed season

The 3-year review states that corkwing spawning levels are increasing, although timing is not mentioned for this species in the report. When were corkwing observed to be spawning? This is good news, but it is critical to know when spawning occurs to ensure the closed season supports conservation measures for this species. Reports based on anecdotal observations from divers see activity in April. Other studies also showing that ballan spawn in April, once again gives weight to our request for the closed season to be extended to include April.

Voluntary closed areas

We have previously raised concerns around fisher compliance with voluntary closed areas, which is a critical measure in protecting vulnerable habitats. We raise these again here as they appear under-reported in the 3-year review. While only 3 strings were observed to overlap with the closed part of grid cell M12, landings reports suggest between 1174 – 2334 pots were hauled in this cell. Additionally, between 216 – 524 pots were hauled in grid cell L10. While both these cells are only partially closed, these are very large numbers of pots that could be totally or partially within the closed areas, and these figures do not account for the activity of Vessel 3. Both these cells contain known seagrass beds and one observed string in M12 appeared to be right over the seagrass.

The Natural England letter accompanying the HRAs for this fishery clearly states that closed areas around seagrass beds are particularly vulnerable to damage – which makes such incursions very concerning, and potentially in breach of Habitats Regulations. Once again, we would challenge the effectiveness of the voluntary closures, particularly taking account of the unknown activity of Vessel 3. We would instead advocate mandatory closures with clear penalties associated, including revoking of permits.

We would also like to understand whether observers on board Vessel 4 observing strings overlapping the closed area, informed the fisher and reiterated that this was a closed area?

Falling populations

We welcome the proposal to prohibit the removal from the fishery of any rock cook wrasse, as data indicates a decline in the population of this species. However, we raise concerns that observer data (shown in figure 33 in the 3-year review) suggests that other species could also be experiencing declines. Figures are approximate as these are shown only in graph form and we recognise that this is based solely on observed data, with this being a small proportion of the total fishery.

- Goldsinny have reduced from a catch of over 800 in 2017-18 to a catch of just over 500 in 2019 – an approx. 38% decline.
- Ballan show a drop from approx. 150 in 2017 to approx. 80 in 2019 – an approx. 47% decline.
- Rock cook shows an approx. 77% decline.

These are direct figures from the sample of observer surveys not adjusted for effort, and so effort should not be relevant. These declines are deeply concerning.

In addition, while corkwing have increased (approx. 250 in 2017, 410 in 2018 and 420 in 2019) this appears to show a large increase in 2017-18 with a plateauing effect in 2018-19. It will be important to understand how corkwing numbers perform in future years as this flattening out of numbers may serve as an early warning of decline.

We call into question the interpretation of the data in the 3-year review. For example, the review states on page 38: *“suggesting that the landable portion of the catch has decreased but that this has not had a wider impact on goldsinny”*. The facts paint a very troubling picture: the landable portion of the catch has decreased by approx. 26%; the total observed catch of goldsinny has reduced markedly (>800 - >500 or over 37%), the impacts on the population and sustainable yields is not known; and it is premature to draw any conclusions on the ecological impacts this reduction will have.

While we recognise the considerable effort of the D&S IFCA in putting in place the potting permit byelaw conditions for this fishery and the significant resource and expenditure in monitoring the fishery and reviewing the byelaw based on the evidence gained, we continue to have grave concerns around the sustainability of the live wrasse fishery in Plymouth Sound.

9. Further Information (Hyperlinks)

Evidence Base

The following report was presented to the B&PSC on 11th February 2019 and can be read by using the link below:

- [Three Year Comprehensive Review of the Live Wrasse in Devon and Severn IFCA's District \(February 2020\) - Version 1.3.](#)

There was a data review and re-analysis of the report in April 2020. The revised version of the report (Version 1.6) can be viewed using the link below.

- [Curtin, Henly & Stewart - Three Year Comprehensive Review of the Live Wrasse in Devon and Severn IFCA's District \(April 2020\) - Version 1.6.](#)

Current Potting Permit Conditions

[Current Potting Permit Conditions \(Versions Control August 2019\)](#)

End of Report.