

# The National Mullet Club response to formal public consultation – Changes to the Netting Permit Conditions

The NMC provided a detailed response in June 2023 to the bylaw permit review. This response is still entirely valid and is attached as Annex A. The NMC asks that every member carefully read this response in Annex A.

The B&PSC questioned the validity of the landing data quoted in the initial response (attached as Annex A) that was supplied by the MMO. The NMC has received a reply from the MMO stating that the NMC had been supplied and used the correct data. Further, the MMO pointed out that the B&PSC had used data that was provisional.

**Answers to the questions asked in the formal public consultation proposals are detailed below.**

## *1. What is your specific interest in Salcombe Estuary?*

The NMC represents anglers with an interest in fishing for the three species of grey mullet in UK waters as well as other species. Salcombe is a popular venue for members resident in the Southwest as well as those visiting the area. The Salcombe Estuary currently provides good fishing and access for a variety of species. Where commercial netting has increased in these areas fishing has deteriorated quickly, this has occurred in several fisheries for instance, Poole Harbour which was once considered the premier thick lip mullet fishery and is now no longer fished for this species.

## *2. Will you be impacted (positively or negatively) financially or otherwise, by this change – how and why?*

The NMC and other recreational anglers will be negatively impacted as the fishery will decline and there will be no viable stock to target. Financially it will mean local anglers will need to travel elsewhere, often at greater cost and visiting anglers will move to other areas.

## *3. In what ways will the commercial and/or recreational fishing sector be impacted (positively or negatively), by this change – how and why?*

Aside the answers to question 2 the loss of fishing through deterioration in catches has caused many anglers to give up their sport. For many age and financial reasons means that this part of their lives – often for fifty years or more, cannot be replaced often leading to mental and physical health challenges.

Commercially the target species of grey mullet are most valuable when landed in small quantities from mixed fisheries out at sea where the fish are likely cleaner than when netted inshore due to water quality and diet. Netting aggregations – especially spawning aggregations, makes no sense commercially as prices are driven down often far below the normal market value.

## *4. In what ways will the natural environment and/or fish stocks be impacted (positively or negatively) by this change – how and why?*

Much of the answer to question four is contained within the previous response in Annex A. To summarise specifically to grey mullet species, they use the harbours and estuaries for much of their life for refuge, as a nursery and critically to aggregate prior to spawning during

winter. To net the mullet at this time is against any good fishery management practice as it will cause huge problems with current and future stocks.

When D&S IFCA put this bylaw in place it was, and still is at the moment, a bold decision and to quote the IFCA 'to do the right thing'. This is a bylaw is an example that every other IFCA should aim to replicate. Instead, it is proposed to change the conditions allowing damaging, unsustainable netting for very short term small commercial gain at the expense of every other stakeholder and the fish.

It cannot be suggested that this is not the case. It is widely acknowledged that grey mullet are extremely vulnerable to overfishing. Netting immature fish repeatedly or retaining at first capture and preventing the fish living to maturity and spawning cannot be managed by an unsuitable or indeed any MCRS (this should be at least L50 47cm). The only management measure proposed that it seems is deemed necessary by the B&PSC.

Potentially, and very likely, there will be many boats and nets fishing at all states of the tide day and night. Figure 1 below from the D&S IFCA paper '*Understanding Mortality of European Sea Bass (*Dicentrarchus labrax*) in Small-Scale Inshore Netting v1.1*' shows how much of the estuary is covered by just one boat using nets up to 200m in length. This netting took place at various states of the tide demonstrating that tide will not influence effort and

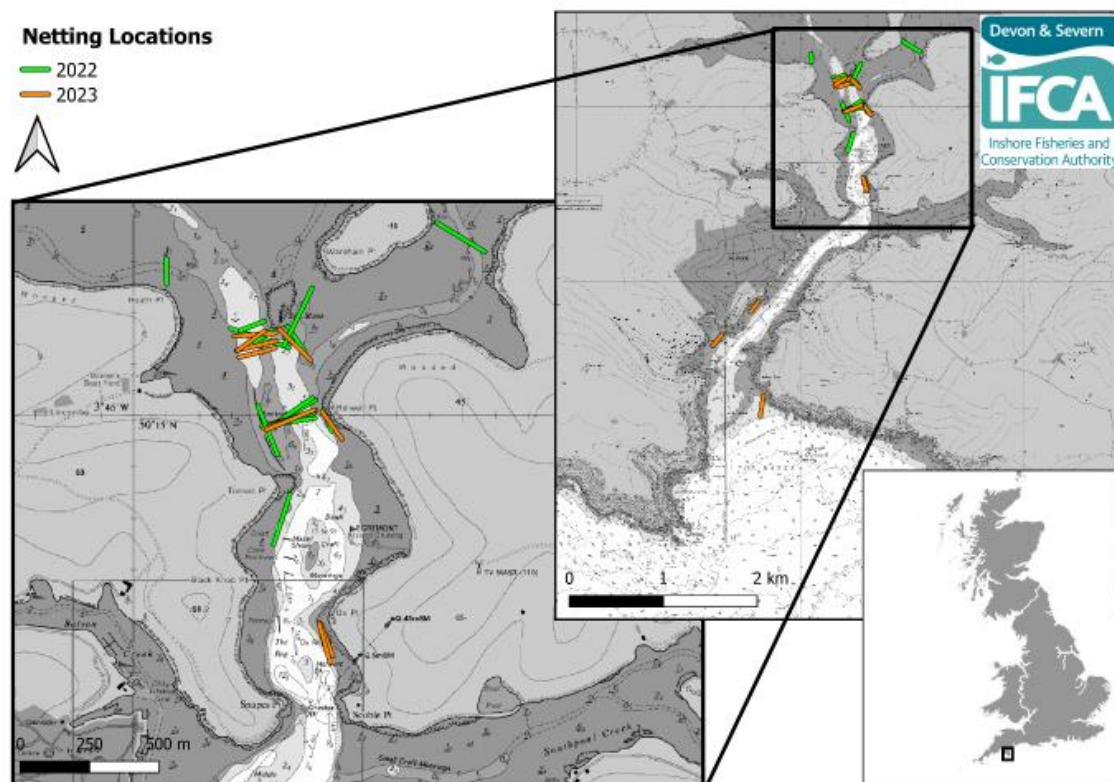


Figure 1. Study location near Salcombe, South West England, showing where nets were set in 2022 (green) and 2023 (orange).

Figure 1 from the IFCA paper *Understanding Mortality of European Sea Bass (*Dicentrarchus labrax*) in Small-Scale Inshore Netting v1.1*

just how much pressure will be exerted upon fish stock by just one small boat using two nets. Multiply the boat by ten, the nets by two and then the period for six months, how can that be justified or considered sustainable in such a small estuary targeting a vulnerable species? This will occur day and night for six months, 20% plus mortality on discards each time and further damage repeat captures!

There is no precaution, impact or risk assessment, lessons from elsewhere are not heeded. A remark that grey mullet are a 'non pressure stock' seems to intimate that it is considered, ignoring evidence provided, that there is an abundant supply that will mitigate all the mismanagement of other stocks. It is blatantly obvious this is far from the case.

Should this proposal be voted through it will reinforce all the negativity that surrounds UK fishery management and demonstrate that D&S IFCA are not serious when it comes to their responsibilities to manage the fishery sustainably and for all stakeholders. It is obvious from our (NMC) work on this consultation that there is tremendous opposition to the proposal including the IFCA Officers! If voted through it will damage the great reputation that D&S IFCA has among anglers, various organisations and the community.

The NMC believes that the smaller U10 fleet is something that should be a valuable asset producing high quality, high value, fish. Whilst the NMC sympathises with and notes that the opportunities available to the smaller U10 commercial fleet are limited due to overfishing and other issues; the issues which have caused a decline in traditional species targeted and the problems it faces need addressing by the MMO and DEFRA; not by unsustainable fishing of other stocks.

For the reasons stated the NMC believes that the bylaw should remain unchanged and it would be a damaging precedent that goes against the wishes and needs of all stakeholders whilst destroying the conservation aims it was written and acted to protect and enhance.

Andy Burt

Chairman, The National Mullet Club



## **Annex A**

### **Devon & Severn Inshore Fisheries and Conservation Authority (D&SIFCA) Netting Permit Bylaw Review, Benefits and Implications**

Response from Andrew Burt, Chairman of the National Mullet Club (NMC), I have also written and submitted a separate response on behalf of myself. Please consider this the response from the NMC.

The National Mullet Club (NMC) applauds D&S IFCA for this bylaw which protects the critical estuaries used as refuge and nursery areas from damaging fishing practices.

The D&S IFCA netting bylaw came into effect on the 1<sup>st</sup> March 2018. After 5 years it is now up for review and evidence gathering has begun.

D&S IFCA introduced this bylaw to protect salmonids, bass, grey mullet and other species that use these inshore areas for migration, as nurseries or for refuge. In doing so D&S IFCA recognised the importance of protecting these areas from commercial fishing and the benefits to recreational fishing and local communities. It is worth noting that many of these areas now fully protected are BNAs (Bass Nursery Areas) and are ecologically sensitive.

The bylaw as it stands only allows for seine netting for sandeels. This offers complete protection of all other species using the estuaries and harbours.

The Environment Agency pushed for a complete ban due to the poor ecological status of salmonids particularly Atlantic Salmon. The financial benefit to local communities of thriving salmon and sea trout is huge, not only getting local rods out fishing again but attracting anglers from other parts of the country to return.

The harbours and estuaries are home to all three native UK grey mullet species, particularly thick and thin lipped. These two species use these areas throughout the juvenile stages and then adulthood. It can take a thick lip mullet 10 – 12 years to reach maturity before they can breed for the first time. Often aggregating in large shoals and demonstrating a high site fidelity (often returning to the same places) they are particularly vulnerable to overfishing. During winter months they are known to aggregate in particularly large shoals prior to spawning; this makes them extremely vulnerable to commercial exploitation at the time when they are most in need of protection.

As previously mentioned, many of the areas protected are already BNAs, however this does not protect bass from illegal commercial fishing or mortality when caught in nets set for other species and outside of months when bass nursery regulations apply. Like grey mullet species they are spiky and easily caught in gill nets of any mesh fished tight or slack.

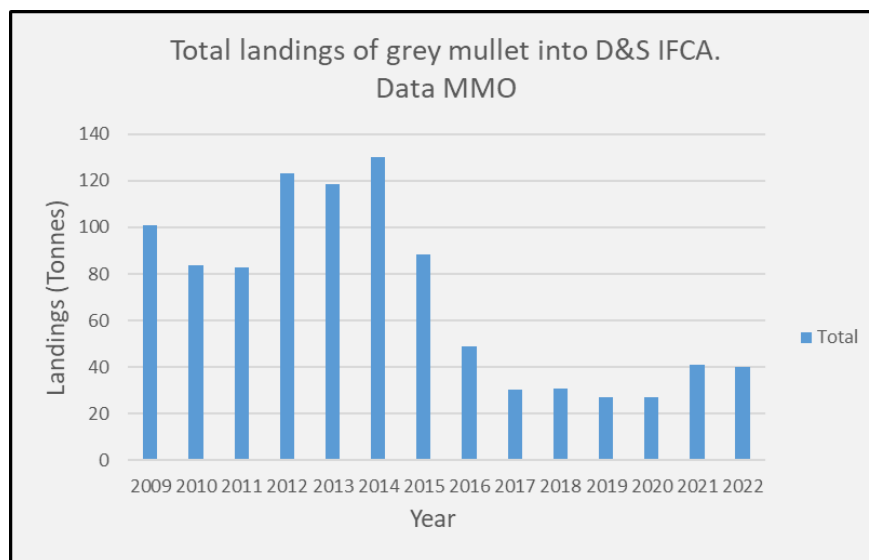
These inshore areas are important not only for the fish but for recreational angling as they offer good access as few anglers have boats and fishing from the open coast is often not possible or safe. Thriving inshore fisheries are of huge benefit recreationally and financially to local communities where anglers can fish for species such as grey mullet, flounder and

gilthead bream that are of low importance to commercial fishing as well as bass. Further up the rivers anglers and communities' benefit from increased salmonid stocks.

It should be noted that much of the recreational fishing is catch and release, it is estimated that over 95% of grey mullet caught recreationally are returned alive (who would want to eat a fish that has spent 10 – 20 years eating detritus including raw sewage anyway?).

Impact is extremely low for bass and grey mullet species, recreational anglers are severely restricted as to how many bass may be retained, currently two per day per angler.

To sum up, the bylaw has little impact upon commercial fishing but huge positive impacts upon the fish living inshore, the communities and the financial value generated for Devon and Somerset. The NMC firmly believe that there has been a positive impact upon the quantity and size of species since the bylaw was instigated as well as an increase in range of some species such as gilthead bream. During previous consultation landing data from the commercial sector highlighted the low commercial importance of these areas. The protection of these nursery and refuge areas, social and economic benefits to recreational angling, coastal communities as well as those further inland surely highlight that this bylaw should not be changed to weaken it undermining the intent and benefits for small commercial gain that MMO data shows has not actually been missed!



*The graph above demonstrates that the grey mullet stocks that had been forced into decline are showing signs of recovery and that the bylaw did not result in any loss of income from grey mullet. The landings are in fact, greater than in 2018 when the bylaw came into effect!*

Netting aggregations especially when fish are preparing to or have just spawned, is far from good practice. Countries such as New Zealand and the USA have put in legislation to protect spawning aggregations of grey mullet after the practice caused massive crashes in the population. Currently, mullet caught by gill nets are most likely caught in a mixed fishery, as such would be far more sustainable and more profitable as the fish is worth more money.

It is seen all too often that larger landings of grey mullet cause a drop in price, it is not sustainable, it is a horrible waste.

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