

Bass Angling Conservation

Response to D&SIFCA Consultation on Changes to the Netting Permit Conditions

Bass Angling Conservation "BAC" seeks:

- an excellent and sustainable bass fishery
- a fair deal for sea anglers and other recreational fishers
- high quality fishery management

BAC objects to the proposal to open a six-month fixed net fishery within Salcombe Estuary for the reasons set out below.

Socio-economics

D&SIFCA has a statutory duty to "seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district." This requires D&SIFCA to seek to understand the socio-economics needs of the relevant stakeholders and to understand the likely impact of the proposals on the relevant stakeholders. It appears that D&SIFCA has not yet carried out this work. If D&SIFCA were to allow the proposed netting without doing this work, BAC would investigate taking a judicial review.

We believe the socio-economic value of Salcombe Estuary to recreational fishers is high and the proposed netting would reduce this value significantly. On the other hand, the proposed netting would have a low socio-economic value since relatively few fishers would benefit and since the proposal is for a targeted mullet fishery, the economic value would be low. The proposal would therefore reduce socio-economic benefits overall, which is undesirable.

Bass Discards

The proposal is for a 6-month netting period. But for 5 of these 6 months, it would be illegal to land bass (due to the closed period and the Bass Nursery Area rules). The proposal will therefore result in considerable bass discards and mortality since bass and mullet are found in similar locations, as shown by D&SIFCA's recent netting research¹, with bass forming up to 85% of the catch.

The bass mortality rate of 17.4% to 18.8% registered by D&SIFCA is unacceptably high, given that the stock is currently below Btrigger and is expected to decline towards Blim in 2024. The actual mortality rate would be likely to be considerably higher for a range of reasons, including:

- the bass will not be cut out of nets and so will suffer more damage.
- the bass will not recuperate in tank and are less likely to survive when returned immediately to the sea.
- some bass seemingly in good condition will die later as a result of being netted.
- It is likely that a high proportion of bass graded as poor condition will die post release.

The Fisheries Act bycatch objective is that bycatch is avoided or reduced. This proposal would increase bass bycatch.

The Bass Fishery Management Plan aims to reduce bass bycatch and reduce the waste of dead fish. This proposal will increase bass bycatch and, due to the landing prohibition for 5 of the 6 months, will increase the waste of dead fish.

Other Discards/Unselective Fishing

The proposed netting is not selective and will result in mortality of many fish of different species that will be discarded dead or be discarded to die later. Fishery managers should be looking to phase out unselective fishing methods, not create additional unselective and unsustainable fisheries.

¹ Understanding Mortality of European Sea Bass (*Dicentrarchus labrax*) in Small-Scale Inshore Netting

Precautionary Principle

The precautionary principle requires that before opening a new fishery, fishery managers should assess the risk of opening a new fishery and ensure that it is sustainable. It does not seem that D&SIFCA has assessed the risks of opening this new fishery.

Bass Nursery Area

The proposal is to reintroduce netting in a Bass Nursery Area. Bass recruitment has been poor in recent years and the latest ICES assessment notes a significant recent decline in recruitment. The importance of protecting juvenile bass in Bass Nursery Areas has never been higher. Introducing netting in a Bass Nursery Area would result in juvenile bass being killed to the detriment of the stock, the bass fishery and those dependent on it.

Salmonids Protection

The status of Salmonids in England is extremely poor. This proposal would increase sea trout and salmon mortality. Instead, D&SIFCA should be looking at ways to decrease salmonid mortality.

Have Your Say (A Review of the Netting Permit Conditions) Consultation

The D&SIFCA report on the "Have Your Say (A Review of the Netting Permit Conditions) Consultation notes "the angling sector has provided a clear message of support for the current restrictions that apply to the estuaries." and "The need to protect salmon and sea trout was a repeating theme".

It seems that just one commercial fisher used the consultation to ask for netting to be reintroduced.

It is puzzling that D&SIFCA decided to hold a further consultation when it is clear there is little support for the proposed netting and considerable opposition.

Introduction of MCRS

We support the introduction of MCRS for species such as grey mullet and gilthead bream, although we would prefer D&SIFCA to be pursuing these at a national level via the Association of IFCA's. For sustainability reasons, MCRS should be set so as to allow fish to breed at least once before being killed. That means setting the MCRS at

the length that allows 95% of fish to have matured and survived one spawning season.