

SW IFCAs' letter to Defra regarding the management of the pollack fishery in 2024

Officers' Recommendation

That Members note the content of the letter.

Background

The International Council for the Exploration of Seas (ICES) advised a zero catch of Pollack in 2024. ICES considers pollack to be part of a mixed stock fishery. Generally however the pollack fishery is regarded as a targeted fishery by the gill net and hook and line sectors.. ICES advised that a small quota (UK's allocation, 203 tonnes) was provided to reflect pollack taken as bycatch.

The recreational angling sector is recognised by CEFAS¹ as a significant contributor to the overall take of pollack each year but unlike bass, where regulation limits anglers to two sizeable bass per day, no restrictions are in place for 2024 to manage the take by recreational anglers.

Following discussions with representatives of the fishing industry and Defra in December 2023, the Chief Officers of Isle of Scilly IFCA, Cornwall IFCA and Devon and Severn IFCA agreed that it was important to set out to Defra their concerns and the likely impact that the decision to close the commercial pollack fishery would have on commercial fishermen in their respective Districts.

Since the letter was sent, the Marine Mangement Organsation has applied a monthly 100kgs bycatch only pollack quota to the under 10 metre and over 10 metre non sector vessels.

Defra has indicated that it will engage with representatives of the fishng industry and the IFCAs in the next few month to consider options to avoid a bycatch only quota approach to the management of the pollack fishery in 2025.

¹ Radford, Z., Hyder, K., Zarauz, L., Mugerza, E., Ferter, K., Prellezo, R., Strehlow, H. V., et al. 2018. The impact of marine recreational fishing on key fish stocks in European waters. PLoS ONE, 13: e0201666. <https://doi.org/10.1371/journal.pone.0201666>



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By e-mail

cc: Tim Dixon, Head of Fisheries Management, MMO;

20th December 2023

Dear Mike,

Re: Pollack Zero TAC and inshore fishing in the South West

In this letter Devon and Severn IFCA, Cornwall IFCA and Isles of Scilly IFCA highlight specific needs of the small scale fishing sector and provide some additional notes of caution for how pollack are managed to reduce the risk of loopholes and unintended consequences, and to give this species the best chance of recovery.

Throughout the South West, the IFCAs are aware of examples of the impact that the decision to apply a bycatch only TAC will have on all vessels which rely on pollack for a significant proportion of their income. Owners of netting vessels may be able to diversify into other fisheries, but hook and line vessels rely almost exclusively on pollack and bass. There are very limited fishing alternatives that could be achieved through funding for gear; and access to other species is unrealistic due to existing pressures on those stocks, in addition to likely spatial and temporal issues for most smaller fishing vessels.

MMO's catch data shows how the hook and line vessels successfully utilise a small proportion of the overall pollack landings and it may be possible to offset some of the impact for their owners by ensuring that enough bycatch quota is available to hook and line vessels during the year when pollack will be part of the bycatch. There is an opportunity to support these businesses through 2024 through careful management of part of the bycatch allowance for hook and line fishermen whose needs are smallest, but for whom the value is very significant to the viability of their fishing business. IFCAs are in a position to help identify these fishermen and provide local insights if requested.

The Isles of Scilly fishermen are uniquely and disproportionately affected by the zero TAC measure – the District has very limited wet fish opportunity, with no bass, haddock or flatfish landed commercially and no vessels set up for trawling. The fleet is predominantly very small boats targeting crab, lobster and crawfish. With only a limited access to mackerel fishery due to stocks moving north,



pollack are the only local wet fish stock and supply two fish and chip businesses, with wider social and economic businesses within the community. This is a very specific situation in which pollack are the principal resource which underpins fishing activity for three fishermen, direct economic activity for two local businesses and indirect economic benefits locally to an estimated 1520 other individuals and small businesses.

IFCAs share the concerns that have been raised regarding the recreational sector including charter angling boats. The shared ambition is to ensure that pressure is removed across the board to allow the stock to recover, but the risk remains that recreational and charter angling sectors may seek to expand into the gap left by commercial fishing vessels. The use of bag limits for recreational bass fishing has been successfully used as part of the solution to limit the uptake of a species which is under pressure from both recreational and commercial fishing and has widely been accepted as a necessary and effective measure. The monitoring of the recreational fishing sector would clearly put a great deal of additional pressure on regulators and IFCAs are open to discussions on how we can support this, should the recreational sector become subject to any pollack fishing restrictions.

There has been no mention of the pollack that will inevitably be landed by non-powered vessels (NPV). There are around 100 NPVs registered with the MMO for Cornwall alone, which it would seem are not subject to any quota restrictions and may continue to sell any amount of their pollack catch. It is therefore concerning that pollack landed from NPVs could be attributable to the UK Area VII 203t pollack bycatch quota, seriously reducing the availability of pollack bycatch for the licensed commercial fishermen in 2024.

In the absence of these opportunities, and as discussed with stakeholders on the FIAG call last week, we endorse the need for mobilisation of crisis funds for fishing businesses that have been disproportionately impacted by the zero TAC.

Through October, IFCAs were actively engaging with Defra and the MMO to provide ideas for how small-scale hook and line fisheries could thrive under a small quota allowance. In direct communication with fishermen, some proactive measures were put forward in October that could have enabled a carefully managed hook and line fishery requiring a relatively small amount of pollack uptake. In the context of difficult decisions around a dwindling stock, we think that a more proportionate solution was achievable that would achieve more effective conservation outcomes and support small scale fishermen. It is unfortunate that this outcome was announced at very short notice, with little opportunity for businesses to adapt and for anyone to plan and resource appropriately.

Beyond the ideas and points presented in this letter, we also support the need for a collective review through which we can learn lessons as to how a fish species that was marketed as the great 'sustainable alternative' over the last two decades, reached a point in 2023 where Governments have had to resort to imposing a zero catch at short notice.

Yours sincerely,



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Chief Officer, Cornwall IFCA



Tom Hooper
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