Formal Consultation Responses – 01 to 040, not all in number order.



Some of the responses, came via letters, attachments, via D&S IFCA office email etc and have been copied out for ease of viewing.

**Response 01**

I am writing in response to your proposed amendment to the Netting byelaw in Salcombe Estuary. As a recreational angler this is of huge concern to me and I oppose the use of nets in the strongest possible terms. The estuary is a recognised bass nursery area and environment of significant importance to gilthead bream, flounder, plaice and salmonids to name but a few species. The indiscriminate fishing that netting provides will, in no doubt, result in a significant number of non-target species being caught and killed, inevitably this will include a number of immature and adult bass. Some might infer that this is actually the true target for these nets, (I’m sure you have at your disposal the figures for the very meagre mullet fishery within the South West). With Bass stocks hovering just above BLIM you are in danger of being responsible for damaging a very slow stock recovery. Amidst the rewriting of the BFMP we have heard a great deal of rhetoric in relation to fish stocks and maximising economic benefits for coastal communities. The figures don’t lie, you can not do this by constantly prioritising commercial fishing over recreational angling. Salcombe is a very popular destination for anglers and this proposal threatens to change that. If a mullet fishery is the true intention, I would have little doubt that income brought to the local area through recreational angling would far outweigh the value of a mullet based commercial fishery and when the fish have gone, as they inevitably will, this recreational input will also be lost. It’s a lose lose situation.

The regulations pertaining to these proposed net fisheries, I believe, are almost impossible to adhere to. I refer to the suggested permitted soak times in relation to the length and number of nets involved. I would like to know how you are proposing to police this fishery. There exists a great deal of anger amongst recreational anglers that, at this time of year, aggregating, pre-spawning bass are illegally targeted with nets off the coast of the South West and Cornwall in particular. It seems that the relevant authorities are either happy to turn a blind eye to this illegal activity, or are incapable of enforcing the law. Are we going to have a similar scenario with netting in Salcombe?

There is already a feeling of anger and frustration that this proposal has come about because local commercial fishing has emptied the area of Brown Crab and now they need to move on to the next thing. True or not, this form of fishery management is very shortsighted. Somebody, somewhere is going to have to ‘grow a pair’, if you’ll excuse the phrase, and cease this constant bowing to pressure from the commercial sector before our fish stocks (they belong to everyone and not commercial fishers as often seems the case) are in an even worse position than they are now.

But, perhaps of more concern to the wider public is the risk to other wildlife. We have seen numerous cases this year of birds, mammals and cetaceans that have been entangled in fishing nets and killed. A great deal of these populations are already subject to their own pressures.

In all honesty, it beggars belief that this proposed legislation has got as far as a public consultation. It is a huge backward step for fishing, fish stocks and the wider environment and potentially sets a very dangerous precedent for other IFCAs to follow suit. We should be doing all we can to protect these ever decreasing environments, not exploiting them for short term gain. I wholeheartedly urge you to reject this proposal.

Yours sincerely and with concern, Mark Drewer.

**Response 016**

Dear colleague,

I am writing to submit a response to the formal consultation on proposed changes to D&SIFCA’s netting permit conditions. My comments are restricted to:

“The opening of a six-month fixed net fishery within Salcombe Estuary (subject to range of management measures”.

I am strongly against these proposed changes. I cannot understand why they are even being considered, when the original byelaw, which stopped netting in Devon estuaries, was so well supported, and the pre-consultation responses were so clearly against any changes. D&SIFCA Officers themselves appear to be of the opinion that these changes are not justified. D&SIFCA have gained a reputation for being balanced and progressive; these proposals are anything but.

As a bass angler, and Science Lead for the Bass Anglers’ Sportfishing Society which is currently involved in the [‘FinVision’](https://www.plymouth.ac.uk/research/marine-conservation-research-group/fishing-and-aquaculture/finvision) FISP project with Plymouth University, in addition to leading a programme of [juvenile bass surveys in Cornish estuaries](https://cornwallbassinvestigationsgroup.weebly.com/), my concerns centre around bass. However, if these changes are implemented they will also do great damage to other stocks, such as mullet, gilthead bream and flounder, and the valuable recreational fisheries that depend on them.

Bass tagged in the D&SIFCA study showed a high degree of site residency to the Salcombe-Kingsbridge Bass Nursery Area for most of the year, implying high exposure to the kind of small-scale estuary-based netting activity proposed here.

Byelaw & Permitting Subcommittee members appear to accept that 18.8% netting mortality [[1]](#footnote-1) is acceptable. I do not, especially since most of the dead fish will have to be thrown away because bass can only be retained for one (i.e. January) of the six months of this proposed fishery. The retention of bass may not even be allowed in January if Bass Nursery Area (BNA) restrictions are made year-round in the Bass Fisheries Management Plan (BFMP) when published. But, as the D&SIFCA study acknowledges, the mortality rate is likely to be substantially higher than this in real-world conditions. This mortality rate is also dependent on strict compliance with the conditions of the fishery (e.g. soak time); how good will this be? Previous netting in this estuary is known to have occurred at night, when fish are less likely to see the net, resulting in higher catches, and therefore mortality, than was found during the D&SIFCA study .

The loss of bass will be significant. Although this will be greatest during January, when bass could be retained as bycatch, losses will occur throughout the six-month period due to netting mortality. Up to 17 vessels (<6m limit) would be able to carry out netting, and each will be able to deploy 2 x 200m nets. Presumably each net could be redeployed again as soon it has been cleared, multiple times per day.

Bass losses will include juveniles since, as the D&SIFCA study showed, 12% of the bass caught using a 100mm net were undersized (<42cm). This could be even higher, depending on how the net is set. The importance of maximising bass recruitment, in order to boost stocks, which are currently below MSY, is now widely recognised. BNAs were set up to protect juvenile bass. If implemented, these proposals would set a precedent for other areas, and undo all the progress made in this regard, just when we measures to increase the protection of juvenile bass are being considered. D&SIFCA’s netting policy would be out of step, and not well aligned with the BFMP (in particular goal 7: ongoing protection of the juvenile and spawning bass stock), including considering a prohibition of fixed netting in BNAs.

These proposals are ostensibly about allowing other species (mullet, gilthead bream etc.) to be targeted with nets. And yet, in the D&SIFCA study ,in 2023, 52% of the total catch was sea bass, while only 39% was mullet, and 44% of the net hauls which caught any fish included sea bass as >50% of the catch.

The value of mullet and gilthead bream catches is likely to be small. The value for the fisheries in Estuaries (presumably all estuaries in D&SIFCA’s catchment area) was only approximately £46,000 (CO - B&PSC minutes 31.8.23) when the Netting Permit Byelaw came into place. Again, one has to ask why the changes are even being considered, given the damage they will cause to fish and other wildlife for such low financial return. Birds in particular (but potentially seals as well) are at risk of entanglement with nets. This is likely to be increased when netting is conducted at night.

The key drivers for the introduction of the Netting Permit Byelaw in 2018 and the management measures within the Permit Conditions included the protection of bass, the protection of salmon and sea trout, achieving sustainable development of the recreational angling sector and balancing the needs of others catching sea fish species. These proposed changes undermine all of these, and are discriminatory to anglers in prioritising the needs of a small number of commercial fishermen above those of a large number of anglers, who are opposed to these changes. Sea fish are a public resource, and D&S IFCA has a duty to try and find the correct balance between the commercial and recreational sectors.

At the current time fixed netting is prohibited, making it easy to spot illegal activity. If netting is allowed again, it will be much harder for a passing member of the public to tell the difference between legal and illegal activity, and report suspicious activity. Previous netting activity is known to have occurred at night, making it even harder to enforce regulations.

Robin Bradley

4.12.23

**Response 032**

Dear IFCA, This proposal has come about due to commercial fishermen overfishing brown crab - and cod and bass and now pollack. Estuaries such as the Exe and Teign have also been heavily netted for flounders for pot bait, as more and more pots are having to be used to catch the same number of crabs. This has deprived local RSAs of a popular sporting fish which for many years attracted hundreds of anglers to take part in competitions. The fish in our waters do not belong solely to commercials but to anglers too.

Angling by local people and visitors is very popular in the Kingsbridge estuary, a bass nursery area where netting is currently prohibited. Species targeted include bass, gilthead bream, mullet, flounders and plaice. The estuary is also visited by seatrout and is home to a host of birds and aquatic creatures.

The proposal could see up to 47 boats licensed to net the estuary, with each man allowed to operate two long gill nets. In theory they would be targeting mullet with 100mm mesh nets. As mullet are a slow-growing species, this would mean many mullet being taken before they had a chance to spawn. In theory, all bass trapped in the nets would be returned unharmed except during a brief period. In practice, many would die in the nets and be returned dead or illegally retained. The same would apply to seatrout. Because of their deep body shape, even small gilthead bream and flounders would be caught in the nets. The result would not just be devastating for fish life and deprive anglers of fish to catch, but would also bring death to cormorants and other water birds and to aquatic animals such as seals.

In a small, heavily tidal estuary such as this, fish stocks would be irreparably damaged in no time. All this would be bad enough if commercial fishermen could make a sustainable living doing this. But nobody can make a living catching mullet at £3.50 a kilo. All that would happen would be that a few men would make a bit of money for a short while until stocks were exhausted and then they would be back to square one. Your responsibility is to ensure that fishing is done sustainably. This is not sustainable. Allowing netting in a bass nursery area is madness. And stripping an estuary bare for the sake of a temporary financial gain for a few is simply obscene. Please do not allow this proposal to go ahead.

Graham Broach, Plymouth 07941 427341

1. Understanding Mortality of European Sea Bass (Dicentrarchus labrax) in Small-Scale Inshore Netting [↑](#footnote-ref-1)