

## Topic 3: Changes Relevant to Recreational Netting Activity – Net Length, Combining Nets, and Bag Limits

### Officers' Recommendations

- a) That the maximum length of a recreational net at sea, per permit holder, shall be increased from 25 metres to 50 metres in length.
- b) That Category Two (recreational) permit conditions will be introduced to prohibit combining recreational nets.
- c) That Category Two (recreational) permit conditions are introduced to limit the removal from a fishery the following species to the levels set out below:
  - 10 plaice per permit holder, per calendar day
  - 3 rays (any species) per permit holder, per calendar day
  - 5 sole (any species) per permit holder, per calendar day
  - 15kg of sand eel per permit holder, per calendar day.

### Background

The current Category Two (recreational) Netting Permit Conditions are relatively restrictive. The current conditions limit a net at sea to 25 metres in length. The current conditions include daily bag limits; however, they are currently limited to shellfish species. Other legislation also limits what can be taken on a recreational basis. There is currently no limit on the amount of sand eel that can be taken with a recreational sand eel seine net.

There is no current limit on the number of recreational nets that can be combined; however, if recreational netters work together all nets that are combined must be marked correctly and each permit holder must be present when they are shot and hauled. D&S IFCA has Policy and Clarification documentation relating to the use of multiple recreational netting permits on a single vessel.

### Overview of the Proposals

The proposals in the formal consultation were based around introducing a package of management measures and to recognise that the needs of commercial and recreational netters are different. At the time of writing, there are 64 Category Two (recreational) permits that are valid; however how many of the recreational nets are frequently used is not known. It is not known how many recreational netters choose to work together by joining their nets together, but based on experience and sightings, Officers have the view that not many are likely to operate in this way. Netting without doubt is a hobby for some, to catch food for the table or to catch bait such as sand eel to then use for recreational angling. There are those that continue to question if netting should be a recreational activity. Based on past anecdotal information, the findings from past engagement, and discussion at B&PSC meetings surrounding the likely take from relatively short lengths of nets, a potential package of measures was developed for the formal consultation.

The proposals did include an increase in the maximum net length (at sea), which some would see as a relaxation of a control measure and an increase in effort, potentially an excessive increase in effort. However, the proposals also included additional control measures, regarding joining nets and additional species for a daily bag limit, therefore adding more restriction as compared to current situation. The proposed bag limits for finfish species were not seen by Officers to represent a “challenge” for recreational users of nets to reach these levels of take.

Rather the proposed bag limits were set at levels to harmonise with voluntary measures in the angling zones (the voluntary maximum take by anglers) and, regarding sand eel, to harmonise with levels set in a proposed byelaw (recreational sand eel trawling). Officers and the B&PSC considered the proposals to represent a balanced package of management measures for those conducting netting on a recreational basis.

### Consultation Response

Officers have considered the response in the formal consultation relating to topic 3. The Angling Trust commented on bag limits (plaice, rays and sole), per permit holder, per calendar day as follows:

*“The Angling Trust does not support bag limits being placed on recreational anglers who intend to sustain themselves through their catches. The Angling Trust does support the IFCA in efforts to establish if illegal commercial fishing is being done under the guise of recreation.”*

Regarding the bag limit for sand eel, the Angling Trust stated the following:

*“The Angling Trust notes that for recreational purposes, this species is more likely to be used as bait rather than consumption, and that 15kg appears a significant quantity of bait if there is no commercial intent.”*

The Environment Agency (EA) was not opposed to extending the maximum length of net for a recreational netter, but as part of the increased package of measures. The EA was not supportive of combining nets, with one reason being that it increases (potentially overly increases the risk) the risk of catching migratory fish species if the net is not attended quickly.

### Officers' View

The Authority believes that the separation of different users (and appropriate restrictions for different groups) such as setting bag limits is not discriminatory; instead, it is a justified approach to secure the correct balance for different fishery users. The bag limits already set in the recreational netting permits mirror other recreational permits for potting and diving. The proposed additional finfish species are to better reflect the activity of netting. The addition of the species and levels set represent a tighter control of the activity, which has potentially not been fully understood in the formal consultation.

The introduction of a 25metre maximum length of a recreational net in 2018 was to demonstrate a key difference between commercial and recreational pursuits. Nets of 100 metres in length are considered more of a standard purchase length, but it was not the only length that can be acquired. Officers are of the view that setting the maximum net length for a single recreational net at sea to 50 metres will have minimal impact, is still not signifying any commercial intent, but will go some way to recognise responses in both the pre-consultation and formal consultation. It is part of a package of revised measures for this sector.

To recognise the concerns of the EA and others regarding the joining of recreational nets, the Officers' recommendation is to develop a permit condition to prohibit the combining of recreational nets.

### Background Papers

- B&PSC papers and minutes from meetings (D&S IFCA website Resource Library)
- [Policy & Clarification](#) - Multiple Category Two Permits on a Single Vessel
- Pre-consultation and formal consultation summary reports.