

Consultation Response form on Seabass Fisheries Management Plan (FMP)

Personal details and confidentiality

Would you like your response to be confidential?

- Yes
- No

If you answered Yes to this question, please give us your reason.

Confidentiality and data protection information

A summary of responses to this consultation will be published on the Government website at: www.gov.uk/defra <<http://www.gov.uk/defra>> . An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.

Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (e.g. home address, email address, etc).

If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

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There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts.

This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance> <<https://www.gov.uk/government/publications/consultation-principlesguidance>> .

Please find our latest privacy notice uploaded as a related document alongside our consultation document.

If you have any comments or complaints about the consultation process, please send them to consultation.coordinator@defra.gov.uk

What is your name?

Mat Mander

What is your email address?

m.mander@devonandsevernifca.gov.uk

What is your organisation?

Devon and Severn Inshore Fisheries and Conservation Authority

Which of the following best describes your interest in the Bass FMP

(Required)

Select only one item:

- ☐ Other

If other, please specify.

D&S IFCA has statutory duties under Ss.153 and 154 MaCAA 2009:

153 Management of inshore fisheries

- (1) The authority for an IFC district must manage the exploitation of sea fisheries resources in that district.
- (2) In performing its duty under subsection (1), the authority for an IFC district must—
 - (a) seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way,
 - (b) seek to balance the social and economic benefits of exploiting the sea fisheries resources of the district with the need to protect the marine environment from, or promote its recovery from, the effects of such exploitation,

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(c) take any other steps which in the authority's opinion are necessary or expedient for the purpose of making a contribution to the achievement of sustainable development, and
(d) seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district.

154 Protection of marine conservation zones

(1) The authority for an IFC district must seek to ensure that the conservation objectives of any MCZ in the district are furthered.

IFCAs manage the inshore fisheries and marine environment that may be impacted by them. D&S IFCA also in order to exercise its powers under SS 155 and 156 MaCAA to make byelaws and monitor compliance and undertake enforcement of these byelaws. D&S IFCA is also a relevant and appropriate Authority in other legislation such as Habitats Regulations, Fisheries Act; Environment Act, Wildlife and Countryside Act (as amended), Marine strategy Regulations. Of particular relevance to the FMPs are the Fisheries Act and the Joint Fisheries Statement where IFCAs must have regard to the objectives set out in the Act.

Questions on the proposed Bass FMP

The following questions relate to the Bass Fisheries Management Plan which can be found in the 'related documents' section on the home page.

1 Do you have any comments on the process for developing the Bass FMP?

Details can be found under **Stakeholder Engagement** in the **Executive Summary** of the FMP, **Annex 4: Record of Stakeholder Engagement** and **Annex 10: FMP Goals: Evidence & Stakeholder Views**. Further details can be found in the Policy Lab reports at **Annexes 5,6,7 & 8**.

- Yes
-

If yes, please leave your comments here.

IFCAs were not initially invited to sit on the frontrunner FMPS even though they have years of experience and expertise in managing fisheries and knowledge of the inshore fleets. D&S IFCA was the only IFCA to get involved at the early stages of the Crab & Lobster FMP. This was due to D&S IFCA's Deputy Chief Officer finding out second hand that a meeting was planned and told outright by an industry member that IFCAs were not invited to attend. This led to her contacting Seafish and requesting to a seat on the CMG. Attendance at other front runner FMPs was remedied through liaison with the FMP groups and the AIFCA but this was sometime later after the AIFCA joined the Programme Board, by which time the FMP group had been running for some time, many wheels were in motion and draft FMPs had developed quite considerably by then. This was a failure of FMP process not to have the IFCAs, as key inshore regulators, on the FMP management groups from the outset. For future FMP development a really good cross sections of the interests in the species should be invited at the start of the process.

IFCAs are knowledgeable about the inshore shellfish fleet and understand the economic, social, cultural and heritage importance, to both the small and large ports and their communities in their

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Districts. IFCAs are also able to sense check the data used in the Evidence summary due to their knowledge of these fisheries.

It is therefore important for IFCAs to be involved in all relevant future FMP development as it is clear that mistakes have been made in the front runners in terms of what the membership should be and developing a formula for stakeholder involvement would be a key step forward.

A concern that D&S IFCA would like to raise regarding the FMP consultation process is the amount of documentation included in the consultation. With all of the Tranche 1 and 2 FMP consultations, there is a multitude of documents to review to be fully informed of the objectives of the plans, proposals for management and research requirements. Each FMP consultation consists of the FMP itself; multiple annexes detailing evidence analysed, communications undertaken, and research planned; a Strategic Environmental Assessment and a De-minimus Impact Assessment. Many of these documents are over 100 pages in length. Whilst the summaries are useful, in order to be informed of all the evidence used and research planned to inform the FMP consultation, review of all documents is necessary, and this takes a great deal of time and effort. Consulting on all six front runner FMPs at the same time is not satisfactory. It would have been more accommodating to stagger the consultations over time to allow stakeholders an opportunity to review each one rather than having to respond to six by the same date. D&S IFCA believes that the current process makes it difficult for many stakeholders to successfully engage in the FMP process. Having all these FMP consultations out at the same time makes it difficult to and time consuming to respond.

2 What are your views on the evidence presented on the current state of bass stocks in English and Welsh waters and can you provide any other evidence which supports or differs from ours?

Details can be found in the **Current Status of the Fishery** section of the FMP and **Annex 3: Bournemouth University Report**.

Further comments or evidence.

A common theme to all the front runner FMPs is the reference to 'Coastal Communities'. It is important that coastal communities are better defined so that it can differentiate between the needs of small scale and large-scale fishing ports and geographical recreational interests. For example, the recent MMO commissioned review of the dover sole fishery in Lyme Bay identified the various port dependencies on sole and where the main recreational fishery takes place. A similar approach to bass may provide a much better understanding of the relative importance to each coastal community around England and Wales.

The following points relate to Goal 5 of the FMP which states: 'Bass is particularly important to inshore fishers due to its high market prices, appealing fishing experience for recreational sea fishers and historical legacy for English and Welsh coastal communities. If managed appropriately, bass fishing therefore has the potential to generate substantial social and economic benefits for local coastal communities'.

The evidence statement minimises the importance to the commercial fishery. On page 12 of the Evidence Statement the document sets out that over the last six years only eight to nine commercial

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vessels were dependent on bass landing for more than 20% of the owner's income and the owners of only between two and six vessels rely on bass for more than 60% of their fishing income. D&S IFCA understood that the majority of commercial vessels that use rod and line as the main method of fishing rely on bass for the majority of their income, this number is far higher than the report suggests. Rod and line vessels usually target bass during the summer and autumn and pollack during the rest of the year. The decline in pollack stocks and the recently introduced MCA restriction on the distance from shore that under 8m vessels can operate mean that the reliance on bass landings is likely to increase in future years.

To complicate the assessment of the reliance on bass, at page 9 ,the evidence statement sets out that the higher price attained by rod and line caught bass was approximately £10/kg (between 2016 and 2021). Whereas on page 13 the report suggests bass prices have been between £40 and £70 per kg. Page 15 of the report suggests that only four Full Time Equivalent employees (FTE) were associated with vessels landing bass other than the Southwest beamer fleet and u15m scallop dredging fleet. It is correct that many smaller vessel fishers also have alternative employment ashore but fishing with rod and line generally requires more crew than other forms of fishing and collectively the FTE of these fishers will be considerably higher than four FTEs. At the Southwest RFG meetings there is a standing request to review the current limitations on landing to allow small scale fishers to land a small quantity of bass because of its importance to their potential overall income. For example, the owners of vessels without nationally administered Shellfish Entitlement are permitted to land up to 5 lobsters and 25 crabs per day.

It should be noted that bass is targeted by the recreational sector for sport and consumption. The high value of bass and the availability of improved tackle and technology (sounder etc) means that large catches can be achieved by unlicensed anglers and the temptation is to push surplus bass into the public food chain.

3 Do you agree that these goals are appropriate for domestic management priorities within the Bass FMP?

Details can be found in the **Management Goals section** of the FMP and **Annex 10: FMP Goals: Evidence & Stakeholder views**.

- No

If no, please explain your answer here. D&S IFCA's response to each goal is highlighted in blue

Goal 1: Establishment of bass management groups to facilitate stakeholder participation in management decisions.

Government wants to establish a formal bass management group to support future co-management of bass fisheries through a collaborate approach involving all interested sectors. It is important that such a group is established as the initial proposals in the Bass FMP set out the priority areas for review and consideration, but no specific proposed management measures have been identified. It is intended that an additional evidence sub-group would be established to ensure decision were grounded in science and evidence.

Goal 2: It is proposed that the current access arrangements to the bass fishery should be reviewed by initially tasking the proposed bass management group to review the existing management measures to inform a

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decision on whether to introduce alternative access arrangements. As a priority measures for early consideration include the current bass authorisation system and reference period and the timing and duration of the closed seasons.

A review of the current authorisation system is needed. Although there is evidence that the introduction of the current authorisation system has had the effect of reducing the overall landings of bass, the authorisation system has many weaknesses. The authorisation system did technically mean that there was only a hook and line (rod and line in most instances) directed fishery for bass. Other methods of capture, trawls, seines, fixed nets were technically only allowed to retain bass as an unavoidable bycatch. The reality is that some fixed nets are used to directly target bass and the recent D&S IFCA prosecution identified that large amounts of bass was being transhipped at sea and landed as rod and line caught.

The priority is to consider equitable access to the commercial fishery. It is important that the review references Section 25 of the Fisheries Act. Section 25 sets out what should be considered when distributing fishing opportunities. The priority is to address the commercial fishery requirements however it is recognised that the recreational fisheries are responsible for approximately 27% of fishing mortality and the recreational fishery contributes significantly to local economies. Although the relevant data in Annex 2 Evidence Statement is questionable and is explored in more detail above (and Goal 5 below), there is concern that if these current figures in the Evidence Statement are used and under report the importance of bass to the commercial sector, then some may suggest that the recreational fishery is prioritised.

There is an increasing risk that non powered vessels will undermine the management of bass if they are not included within future regulation. D&S IFCA understands that some commercial vessel owners are already stating that they use non powered vessels for part of their fishing and because they are not licensed vessel they are not subject to any catch restrictions so potential for cross booking is very easy to achieve.

A review of the seasonal closures of both the commercial and recreational bass fisheries is needed. There have been adjustments to the seasonal closures, and it is generally recognised that the protection of the offshore spawning stock has been improved with the prohibition of directed pair trawling activities. Page 17 of Annex 2 suggests that inshore spawning and inshore aggregations of bass are important and there is evidence that the inshore aggregations of pre spawning bass are being caught by trawls and nets and results in increasing discarding or illegal retention of bass.

Goal 3: It is proposed that management measures should be reviewed to reduce the waste of dead bass and improve data collection to better manage discarding. Early consideration set out in the FMP include providing derogations to trawling vessel to exceed the current 5% bycatch limit per trip, to use the catch app to record discards and support the continuation of the REM Celtic Sea programme.

A review of the management of discarding is a priority. The highest profile response to concerns regarding discards and wasting of fish was the introduction of the Landing Obligations. The introduction of this legislation demonstrated an intention to reduce discarding, but it has not been without its challenges and has had unintended consequences such as the removal of the 5% bycatch rule of quota species caught whilst scallop dredging. Ideally the best approach would be to minimise the opportunity for non-directed fisheries to catch the bass and then create better provisions to land genuine unavoidable bycatches of bass. The Celtic Sea REM programme is referenced and technology must ultimately have a key role in future fisheries management and in the short-term the

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roll out of IVMS may provide opportunities to explore the greater use of real time closures across the towed gear sector similar to north sea cod real time closures. Given the reported fishing mortality of the recreational bass fishery, promotion of lure fishing or use of circle hooks when using bait could have a significant benefit and with little loss of fishing opportunities. The reliance on reporting via the catch app is questionable as there is no independent way of verifying the reports and there may lead to over or under reported bycatches.

Goal 4: Ensure compliance with bass regulations. A consistent message from the consultation was that better monitoring and enforcement of the existing management measure by the MMO and IFCA's was needed. The theme for early intervention was to improve communication and available guidance.

The short-term approach seems mainly to improve compliance through fishers better understanding of the regulations with emphasis on the recreational sector. Signage is always helpful where it can be installed but care is needed to maintain the accuracy of the information. Until recently there was signage within D&S IFCA's District referring to the maximum landing of three bass per recreational angler per day. In addition to information dissemination there needs to be an effective enforcement approach to deter fishers from circumventing the rules. It is questionable why this critical aspect of any management approach is only referred to in the medium to long-term. Policy Lab's consultation suggested that many within the fishing sectors wanted more effective enforcement as soon as possible. To support more effective enforcement, immediate action to address the key loopholes in legislation should be prioritised including those set out in the medium to long term actions of the draft FMP.

Goal 5: Bass is particularly important to inshore fishers due to its high market prices, appealing fishing experience for recreational sea fishers and historical legacy for English and Welsh coastal communities. If managed appropriately, bass fishing therefore has the potential to generate substantial social and economic benefits for local coastal communities.

The above statement is lifted directly from the proposed FMP, yet the evidence statement minimises the importance to the commercial fishery. On page 12 of the Evidence Statement the document sets out that over the last six years only eight to nine commercial vessels were dependent on bass landing for more than 20% of the owner's income and the owners of only between two and six vessels rely on bass for more than 60% of their fishing income. Officers understood that the majority of commercial vessels that use rod and line as the main method of fishing rely on bass for the majority of their income, this number is far higher than the report suggests. Rod and line vessels usually target bass during the summer and autumn and pollack during the rest of the year. The decline in pollack stocks and the recently introduced MCA restriction on the distance from shore that under 8m vessels can operate mean that the reliance on bass landings is likely to increase in future years.

To complicate the assessment of the reliance on bass, at page 9 ,the evidence statement sets out that the higher price attained by rod and line caught bass was approximately £10/kg (between 2016 and 2021). Whereas on page 13 the report suggests bass prices have been between £40 and £70 per kg. Page 15 of the report suggests that only four Full Time Equivalent employees (FTE) were associated with vessels landing bass other than the Southwest beamer fleet and u15m scallop dredging fleet.

It is correct that many smaller vessel fishers also have alternative employment ashore but fishing with rod and line generally requires more crew than other forms of fishing and collectively the FTE of these fishers will be considerably higher than four FTEs. At the Southwest RFG meetings there

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is a standing request to review the current limitations on landing to allow small scale fishers to land a small quantity of bass because of its importance to their potential overall income. For example, the owners of vessels without nationally administered Shellfish Entitlement are permitted to land up to 5 lobsters and 25 crabs per day.

It should be noted that bass is targeted by the recreational sector for sport and consumption. The high value of bass and the availability of improved tackle and technology (sounder etc) means that large catches can be achieved by unlicensed anglers and the temptation is to push surplus bass into the public food chain. The ability to operate from a non powered vessel gives recreational anglers a similar opportunity to circumvent current management by guising as a commercial angler.

Given the importance of bass to the recreational angling sector there are no proposals in the FMP to develop access to the fishery.

A common theme to all the front runner FMPs is the reference to 'Coastal Communities'. It is important that coastal communities are better defined so that it can differentiate between the needs of small scale and large-scale fishing ports and geographical recreational interests. For example, the recent MMO commissioned review of the dover sole fishery in Lyme Bay identified the various port dependencies on sole and where the main recreational fishery takes place. A similar approach to bass may provide a much better understanding of the relative importance to each coastal community around England and Wales.

Goal 6: The primary aim of FMPs is to ensure that the stocks in scope are harvested sustainably. Since the introduction of the current management approach in 2015, harvesting of the bass stock has been maintained within sustainable limits aligned with ICES advice. In future, it may be possible to build on this foundation to enhance the potential benefits from bass fishing by exploring alternative harvest strategies in line with other FMP goals.

The evidence statement sets out that a limited recovery of the stock has been noted but the scientific data indicates that the stock is still below MSY B Trigger levels meaning that there is still an increased risk of recruitment failure to support the fishery. The FMP states that bass stocks have increased and are currently fished within sustainable limits in line with ICES advice. However, the stocks are considerably lower than historical levels and further recovery of the stocks well above MSY B Trigger level should be achieved if the bass fishery is to be recognised as 'world class'. The medium to long-term strategy acknowledges this point.

Goal 7: Although the bass stock has shown signs of recovery in recent years, spawning stock biomass (SSB) and the recruitment of juveniles remains a concern. Effective protection of the spawning and juvenile bass stock will enable the stock to replenish most efficiently.

The above rationale recognises that there is much more to do to support the recovery of the bass stocks and that protection of the juvenile and spawning bass is a priority. With variable recruitment, maximising the number of juvenile bass entering the fishery is key and avoiding the adult stock during spawning or pre-spawning aggregations is important too. However, the FMP short-term approach is to gather more evidence. Some of the medium to long-term considerations could be introduced earlier. For example, fixed and drift netting is now prohibited in all South West estuaries (Cornwall and D&S IFCA's District) and could be extended to all BNAs in England and Wales.

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Goal 8.1: The focus on minimising the impact of the bass fishery on the wider ecosystem is to reduce the bycatch of endangered, threatened, and protected species. The FMP highlights the risk of nets to seabirds, marine mammals, elasmobranchs, turtles, and migratory fish.

The short-term considerations include allowing fishers with authorisations to use fixed nets for bass to switch to using hook and line gears as these have a much lower incident of bycatch of many of the species listed above. This approach would also be consistent with Section 25 of the Fisheries Act 2025.

Medium to long-term proposals include reviewing the practice of shallow inshore and shore-based netting to determine whether additional regional or national protections are needed to prevent migratory fish bycatch. D&S IFCA is currently reviewing its management of netting, including coastal netting.

Goal 8.2: Reduce impacts of gear on seabed integrity by minimising the impact of fishing gear on seabed integrity and benthic habitats.

The FMP proposes to maintain current restrictions on targeted trawling and netting of bass as part of a continued shift towards lower impact gears. If stopping the targeting of bass continues to be the approach of the FMP, then the current restrictions need to be reviewed as there is clear evidence that bass is being targeted by netting in particular.

Goal 8.3: Reduce contribution of bass fishing to marine litter. Abandoned, lost, or discarded fishing gear is associated with sensitive species entanglements and ghost fishing.

D&S IFCA supports this goal and is looking at whether to consult on introducing a management measure to address the issue of abandoned nets.

Goal 9: Mitigate against and adapt to the impact of climate change on bass fishing.

The focus is to undertake research into the possible effects of climate change on the bass fishery. There is also recognition that an increased biomass could contribute to improved blue carbon ocean storage.

4 Do you agree that these actions are appropriate short-term priorities for the Bass FMP?

Details can be found in the **Management Goals** section of the FMP and **Annex 10: FMP Goals: Evidence & Stakeholder views**.

See D&S IFCA comments under Question 4

5 Do you agree that this approach outlines suitable medium long-term priorities for the Bass FMP?

Details can be found in the **Management Goals** section of the FMP and **Annex 10: FMP Goals: Evidence & Stakeholder views**.

[See D&S IFCA comments under Question 4](#)

6 How would you like to be involved in the delivery of the plan and the future management of the English and Welsh bass fishery?

Details can be found in the **Management Goals** section of the FMP and **Annex 10: FMP Goals: Evidence & Stakeholder views**.

D&S IFCA would like to see IFCA representation as part of the working groups to aid the implementation of the FMP and development of future management of bass fisheries.

D&S IFCA can also help disseminate information to all those involved in bass fisheries in its district including commercial and recreational fishers and help their engagement in future management proposals.

7 Are there any important connections with or links to other fisheries that we should consider when finalising this FMP or during its implementation process?

Comments on links to other fisheries.

The Bass FMP and its implementation process should consider the link with Channel Non-quota species and its FMP. This is because bass management is aligned with towed gear vessels as it can make up a percentage (5%) of the composition of the total catch on board these vessels, and this can lead to greater retention of non-quota species so that the bass can be retained and landed. For example, if 100kg of bass is retained it would mean that two tonnes of mainly non-quota species would need to be caught and retained to allow the bass to be landed. This creates an additional pressure on non-quota species and has been highlighted regarding the relationship with dogfish catches.

Questions on the Bass FMP environmental report

The following questions relate to the Bass FMP environmental report which can be found in the 'related documents' section on the home page.

Is there any additional evidence we could consider, to inform our environmental baseline?

Section 3 provides a summary of the current state of the UK marine environment for each of the environmental issues screened into this SEA, and where applicable their associated UK MS descriptors (Table 4).

Our assessment has been conducted against the environmental baseline set out in these sources of existing information.

Please include any additional evidence below.

Are there any other positive or negative environmental effects associated with the policies and actions of the draft Bass FMP that we could consider?

Section 5 assesses the environmental effects of the policies and actions of the draft Bass FMP, in relation to the environmental issues screened into this SEA, and where applicable, their associated UK MS descriptors (Table 4).

Please include any other positive or negative environmental effects associated with the policies and actions of the draft FMP below.

Do you have any comments on the proposed actions set out in the Environmental Report to monitor and/or mitigate any likely significant (negative) effects on the environment of the FMP?

Section 6 details the proposed measures for reducing significant negative environmental effects arising from the Bass Fisheries Management Plan, for issues scoped into the assessment.

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Please include any comments on the proposed actions to monitor and/or mitigate any likely significant (negative) effects on the environment of the FMPs.

Do you have any additional comments in relation to the Environmental Report which you have not been able to provide in response to the previous questions?

Please include any additional comments in relation to the Environmental Report below.

Consultee feedback on the online survey

Dear Consultee

Thank you for taking your time to participate in this online survey. It would be appreciated, if you can provide us with an insight into how you view the tool and the area(s) you feel is in need of improvement, by completing our feedback questionnaire.

Overall, how satisfied are you with our online consultation tool?

- **Very satisfied**
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied
- Don't know

Please give us any comments you have on the tool, including suggestions on how we could improve it