



Monitoring the Whelk Fishery 2025 Stakeholder Engagement Report

**A Summary of Responses from Telephone Interviews
Conducted with D&S IFCA's Potting Permit Holders who
Fish for Whelk**

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April 2026**

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Version Control

Officer	Date	Comments	Version
S. Curtin	14/01/2026	Skeleton draft	0.1
J. Stewart	17/02/2026	Comments on draft report for revision	0.2
S. Curtin	10/03/2026	Draft 2	0.3
J. Stewart	18/03/2026	Draft finalised for SMT review	0.4
S. Clark	26/03/2026	Comments added for SCu to respond	0.5
S. Curtin	31/03/2026	Amendments following SC comments	0.6
S. Clark	13/04/2026	Final Review	1.0

1. Introduction

Between 2013 and 2016, Cefas and Devon and Severn Inshore Fisheries and Conservation Authority (D&S IFCA) conducted sampling work to investigate the Size of Maturity (SOM) of whelk and the seasonality of whelk spawning in D&S IFCA's District. Monthly samples were collected from both Ilfracombe (representing the District's north coast), and Exmouth (representing the District's south coast). The study found that SOM was greater for whelk caught in the Ilfracombe fishery (shell height 76.6 mm for females and 76.4 mm for males) than in the Exmouth fishery (shell height of 69.3 mm for females and 70.9 mm for males). In both cases, the evidence demonstrated that the EU Minimum Conservation Reference Size (MCRS) of 45mm was insufficient to protect the spawning stocks and therefore the sustainability of the population. As a result, D&S IFCA revised its management measures in November 2018 through its Potting Permit Byelaw Permit Conditions, increasing the MCRS of whelks within the District to 65mm over a two-year period (increased to 55mm in November 2018 and 65mm in November 2020).

For the 2025/2026 Annual Plan, D&S IFCA identified the need to evaluate outcomes (for the industry and whelk stocks) of the change in management measures and to gain an insight into industry perspectives of any change in the whelk fishery over this time. This included reviewing evidence that might suggest movement into or out of the fishery, views on future management and a reflection on the amount of fishing effort.

2. Methods

In 2025, D&S IFCA determined that stakeholder engagement in the form of telephone interviews should be undertaken to assess any impacts of the increase in MCRS on both the industry and whelk stocks within the District. The interviews consisted of a questionnaire containing 14 questions (Appendix I) and focused on the following themes: perceived impact of MCRS management measures; bait use; economic viability and market access; fishing effort; gear types; spatial distribution; potential future management and the national Whelk Fisheries Management Plan (FMP).

To determine which stakeholders to contact, landings data for all species and gear types for the period 2019–2023, for specified vessels (from D&S IFCA's Potting Permit holders) were requested from the Marine Management Organisation (MMO). These data were then filtered to include vessels landing whelk in D&S IFCA's District. Vessels with the largest landings of whelk and individual vessel dependency on whelk landings were used to determine priority order of Permit holders to conduct the interviews with. For the north of the District, a total of 11 vessels were identified, and 26 vessels were identified for the south of the District. The vessel sizes and base ports are outlined in Table 1.

From the North of the District, seven out of a possible 11 responses were received. It should be noted that one of these respondents stopped fishing for whelk in 2022; however, their responses are still included in this report. Of the four vessels which did not provide a response, two vessels were no longer D&S IFCA Permit holders, one was no longer fishing and did not think it would be fair to provide a response, and one did not respond, despite several contact attempts.

From the South of the District, 12 out of a possible 24 responses were received. It should be noted that one of the respondents fishes outside of the D&S IFCA's District, therefore, only information relating to gear set-up has been included in this report. Of those that did not respond, four vessels were no longer on D&S IFCA's potting permit database, one did not

end up fishing for whelk, two have not fished for whelk in D&S IFCA’s District, two have not started fishing for whelk yet but will start in 2026, and three did not respond despite several contact attempts.

Table 1. Vessel base port and length categories of respondents.

Port	Vessel Size			
	<7m	7–10m	10–12m	>12m
Bideford	1	0	0	0
Ilfracombe	0	2	2	0
Appledore	0	2	0	0
Brixham	0	1	1	0
Dartmouth	0	0	1	0
Exmouth	0	2	0	0
Lyme Regis	0	5	0	0
Paignton	0	1	0	0
Teignmouth	0	0	1	0

3. Overview of the Telephone Interviews and Findings

A total of 19 responses were received across the North and South of D&S IFCA’s District. There were mixed responses to the questions, but some main themes/topics were highlighted. This section outlines the main themes, Section 4 outlines more detail on responses, and Section 5 places the responses in the context of wider evidence, for example on the size of whelk found in the District.

The core season for whelk fishing appears to be from November to June with the majority of fishers fishing both within and outside the 6nm limit, although this seems to be more prevalent in the North of the District. This may be due to increased gear conflict in the South of the District as individuals raised issues with trawlers towing up potting gear if it is outside the 6nm limit.

The frequency of fishing varies between the North and South of the District. In the North four days a week appears to be the average whereas in the South it is 7 days a week (weather depending). There are a variety of different pots used, with the most common being FishTek, Micky Whelk and Mustang. There is a total of 10,815 pots reported between the 18 individuals who participated in the consultation.

Many fishers thought that the increase in the MCRS appears to have resulted in a decrease in whelk landings in both the northern and southern areas of the District. Some fishers suggested that the inshore whelk population does not typically attain the MCRS of 65mm, and fishers believe that this is responsible for a decrease in landings, although it was unclear whether respondents meant that no whelk reach this size, or that a relatively small proportion reach this size. Individuals also stated that a decrease in landings was a reason for them moving their fishing activity to areas outside the 6nm limit, where the MCRS remains 45 mm. Furthermore, it is thought that whelk size appears to be influenced by habitat type and geographic location. Discussions with various individuals suggest a noticeable difference in whelk size between the eastern and western areas of the North and South of the District, with smaller whelk being reported in the east.

Although not everyone agreed with the implementation of the new management measures, it was deemed by most that the way it was implemented via a phased approach (over two years) was a lot more manageable. Some respondents, although they were landing less, understood why the MCRS was increased and that it results in more whelks being able to breed.

The most common type of bait used is brown crab (which acts as an attractant) and dogfish, (which keeps the whelk feeding whilst in the pot). This was also reflected in the national Crab and Lobster Fisheries Management Plan (FMP).

The Sea Fisheries Act (Shellfish) 1967 prohibits the landing of any brown crab that 'has recently cast its shell', unless it is to be used for bait. There is a current proposal to prohibit the landing of soft-shelled brown crab thus closing the legislative loophole which currently allows soft-shelled brown crab to be used for bait. The purpose of this proposed management measure is to address stock sustainability by prohibiting the removal of soft-shelled individuals before they are able to reproduce within a given moult cycle, remove pressure on the stocks and to create incentives to ensure crab landings attract the highest market value, as meat yield will be higher. This will also remove the incentive to keep all the catch and the poorer quality being sold for whelk bait at a much-reduced price.

Respondents indicated that they did not use soft-shell crab as bait in the whelk fishery. It is not clear to what extent this reflects practice across the whelk fishery in D&S IFCA's District, and the national Crab and Lobster FMP has identified that there is a market for the use of soft-shelled crab as bait within the whelk fishery.

Permit holders generally appear to have working relationships with commercial bait suppliers and buyers of whelk which streamlines market access, although some have noted inconsistencies in the quality of bait supplied and difficulties in addressing this. Also, some concern was expressed regarding the influence of commercial buyers and processors on the prices of both bait and whelk, and whether this is a disadvantage to fishers.

In terms of management, the predominant suggestion was to reduce the MCRS back to either 50 or 55mm. This is based on the participants' claim that the inshore population of whelk do not reach the current MCRS of 65mm. Pot limitations were also mentioned by five respondents as another form of management that could help support the future of the fishery (by three respondents in the south of the District, and two in the north).

The introduction of a whelk permit or entitlement as part of the whelk FMP was also discussed with participants. It was made clear that D&S IFCA had not supported this suggestion and was not yet aware of what the process would involve. The majority of participants were in favour of a permit or entitlement. The primary rationale for supporting this was the potential to prevent vivier vessels and other larger vessels from entering the fishery. However, some concerns were raised about the permit or entitlement restricting fishers from diversifying to this species if other fisheries were experiencing declines.

Overall, feedback has highlighted a feeling that the increase in the Minimum Conservation Reference Size (MCRS) may have had a negative impact on the fishery in terms of decreasing landings and of fishermen operating beyond the six nautical mile limit, although there was some appreciation of the phased approach to implementation. Stakeholders have expressed a preference for a reduction of the MCRS to 50-55mm. This is covered in more detail in later sections, including that the MCRS change was intended to allow a greater proportion of whelk to breed before capture, and that any benefit of this to the stock would only just be starting to be seen now, due to the biology and lifespan of whelk.

4. Summary of Responses

Below is a summary of the responses that have been divided into sub-sections based on themes from the questionnaire. The summary includes some anonymous quotations from the individual responses.

4.1 Fishing Effort, Gear Types, and Spatial Distribution

The questionnaire asked fishers to confirm whether they fish inside the 6 nm limit (“inshore”), outside of 6 nm (“offshore”) or both, and how they manage operations across the 6 nm limit given the difference in MCRS. Additional questions included fishing frequency, total number of pots fished and gear configuration (pots per string).

North of District Responses

The majority of respondents indicated that they fish both inside and outside of the 6 nm limit, with just two individuals advising they only fish for whelk inside the 6 nm limit. Amongst the five individuals engaged in fishing beyond the 6nm limit, three adhere to the inshore MCRS of 65mm even while operating in offshore waters. One individual employs a larger grid for their offshore fishing practices, while the remaining individual did not provide a response.

Individuals were asked about the spacing of their riddles, but precise data on this could not be obtained as fishers could not remember the exact spacing. One fisher advised that their spacing was around 26mm.

Based on discussions with the respondents, it seems that the core fishing season for whelk in the North of the District typically commences in October or November and finishes around June. The table below summarises the frequency of fishing, gear type and configuration used. Fishers that use FishTek pots advised that these are of a better construction than some of the other pots previously used. This is due to the presence of small gaps at the base of the pots which act as an escape gap for juveniles, therefore mitigating the retention of undersized whelk within the pots.

Vessel	Frequency of fishing for whelk (days)	Type of pots	Total No. of pots	Pots per string
1	3-4	Mustang Homemade pots	120 40-50	25
2	5 (if good catches) 3-4 (if not)	FishTek	600	55
3	7 (weather dependent)	Mustang	650	50
4	Summer – 3 Winter – 7	FishTek	650 with extra 330 in winter	55
5	3-4	Mostly FishTek, odd few Mustang but phasing them out	550	50
6	3-4	FishTek	800	50
7	4-5	Micky Whelk	500	50

South of District Responses

Six out of the twelve respondents advised they fish both inside and outside the 6 nm limit, with the remainder fishing inside the 6 nm limit only. Out of the six that fish across the 6 nm limit none of them voluntarily fish to the D&S IFCA's MCRS of 65mm when offshore but instead carry two separate riddles on their vessel. Seven individuals were able to confirm the spacing on their riddles (for the MCRS of 65mm). Four of these were within 25-27mm and three were within 27-29mm. Guidance released by D&S IFCA in August 2018 specified that for the 65mm shell height MCRS, with a riddle set to 27mm approximately 7.9% of the retained catch would be undersized, while 8.8% of the sizeable catch could be lost.

Based on the discussions with respondents, it seems that the core fishing season for whelk typically commences in December/January, two months later than in the North of the District and finishes around June. The table below summarises the frequency of fishing, gear type and configuration used.

Vessel	Frequency of fishing for whelk (days)	Type of pots	Total No. of pots	Pots per string
1**			1200	80
2	Once a week or fortnight	FishTek and Micky Whelk	40	15
3	5	Homemade	600	20
4	7	Mustang	1000	70 strings of 10 5 strings of 60
5	3 (weather dependent)	Homemade	500	50
6	7	Mustang	550	30-35
7	Varies	Micky Whelk	75	25
8	7 (weather dependent)	Buys own from Channel pots	600	40
9	7 (weather dependent)	Micky Whelk	300	25
10	7 (weather dependent)	Shields Creels	1200	50
11	7 (weather dependent)	Micky Whelk and Mustang	500	40
12	7 (weather dependent)	Micky Whelk and Mustang	720	60

** The respondent fishes offshore only.

4.2. Perceived Impact of MCRS Management Measures

One of the main objectives of the engagement work is to establish whether there has been any impact of the increase in MCRS on the whelk stock. In order to ascertain this, respondents were asked to share their opinions and observations on whelk catches, whether these have changed over the last 4-5 years and whether the increase in MCRS has had an impact on the fishery and their landings. In addition, discussions were also held about the fishers' views on the phased approach used to increase the MCRS

North of District Responses

Discussions with respondents suggest that the increase in MCRS has not impacted the overall volume of whelk being caught but has reduced their landable catch. It also became apparent that respondents believe the 'good fishing' goes in cycles, with catches remaining high for around three years and then seeming to drop off.

Individuals didn't seem to think that the amount of whelk per pot had changed, but five out of the seven advised that whelk size seems to be dependent on habitat type and location. For example, based on the discussions with respondents, there appears to be a discernible variation in the size of whelk between the eastern and western regions of the north of the District.

One respondent advised, "different ground hold different size whelk. Large whelks seem to congregate together. In east between Lundy and Ilfracombe there are smaller species of whelk. In some areas whelk don't grow as big as 65mm. Wouldn't matter how long you left it unfished; the whelk would never reach 65mm".

One respondent advised ' MCRS should have been kept at 55mm. 65mm is too big. 70% of catch is 55-65 even offshore'. In addition to this, other respondents advised "the whelk in Swansea Bay don't reach 65mm" and "whelk inshore don't seem to reach 65mm".

The responses indicated that all individuals agreed that the increase had an impact on the fishery and landings, but this was mixed in terms of whether the impact was positive or negative. Some advised it had a negative impact on landings as the whelk inshore don't seem to grow to 65mm and therefore they suggested the increase in MCRS to 65mm was too big. Whereas others, although they were landing less, understood why it was increased and that it does result in more whelks being able to breed.

In terms of how the new management was introduced (over a two-year period) three respondents supported this approach as it was more manageable and less of an impact. Some of the response extracts are:

"I was in favour of the phased approach but didn't realise the MCRS was going to increase to 65mm. This approach was more manageable rather than jumping from 45-65mm."

"I wasn't against the phased approach. Thought it was a good idea as it wasn't a massive change straight away."

"I understand that it is to protect the stocks, makes sense to. Biggest issue was getting a new riddle"

South of District Responses

Discussions with respondents suggest that since the increase in MCRS landings have dramatically reduced. One respondent advised "amount of whelk landing has reduced by around 100-200 kilo per trip. In terms of amounts being caught, this is about the same, but the amount being returned has increased". In addition, another respondent commented "landings have reduced by around 35%. Gone from a 4-month whelking season to a 7-month season now to make a living so having more impact on stock as fishing for longer".

Four respondents advised that they either now fish within Southern IFCA's District or fish outside of the 6 nm (as the MCRS for whelk in those areas is still 45mm). Respondents claimed that this is due to the inshore stock not reaching 65mm. One respondent advised, "I stopped working when the increase went to 65mm as there wasn't anything to catch. Any boat that works out of Lyme and works within D&S IFCA's District are not sticking to the

65mm limit". Another respondent also suggested that some boats are keeping undersized whelk and use a Dorset size riddle in Devon. Only one individual advised that the number of whelks per pot hasn't really changed and there hasn't been a massive impact as a result of the increase in MCRS.

The majority of responses therefore suggest that individuals feel the increase in MCRS has potentially had a negative impact on the fishery economically and socially due to reduced landings inshore, resulting in decreased income working longer hours and some individuals moving outside of D&S IFCA's District to fish as not able to make living inshore. Only one individual, who had fished inside and outside of the 6nm boundary, believed the increase in MCRS had a positive impact in that there are more whelks later on in the year and commented **"financially it wasn't great when the increase in MCRS came in but that's a selfish approach. As a whole it was the right thing to do as years have gone on catches have gone up"**.

Variation in whelk size between the eastern and western regions of the south of the District have also been observed by fishers, similar to those of the North of the District, with individuals suggesting whelks are smaller in the East compared to the West.

There also appears to be some gear conflict in the south of the District, with some respondents stating their gear has been damaged by trawlers if they shoot gear outside of the potting boxes within the IPA (Areas 1,2,3 and Corridor) off Start bay and also within the Torbay and Lyme Bay SAC around the area closed to demersal mobile fishing gear (Annex 2) as part of the Mobile Fishing Permit Conditions.

In terms of how the new management was introduced, only two respondents supported this approach. Most of the respondents believed that the increase to 65mm was too big, with two individuals stating D&S IFCA did not take into account the advice provided by fishers at the time the initial research was conducted and when the change in management was undertaken. Some of the response extracts are:

"Such a big jump from 45 to 55mm. Should have just gone to 50mm. Cannot get anything out of the fishery now in terms of size".

"Increasing the size limit hasn't done anything. I rung you and advised that the increase wouldn't do anything to protect the stock as it's the ground that needs to be closed off".

"It would have been manageable if people played by the book. Boats have Dorset size riddles in Devon District and aren't getting checked by enforcement."

"Phased approach was good but not sure 2 years was long enough. Should have been over a 5-year period. Not enough catch up between 45-55mm to then go another year to 65mm".

"My view to start with was whether you had enough data to back up the decision and that is still my view now. Stock inside 6 nm doesn't really get to 65mm around Start Bay and Thatchers Rock only get to 55 mm and then die off. Also, if the water temperatures are colder then they don't get that big".

4.3. Bait Use

D&S IFCA aimed to collect data concerning the bait types utilised and their respective sources. Participants were also questioned about the implications of new regulations, specifically the prohibition of soft-shell crab as bait, as well as the accessibility and practicality of alternative bait options.

North of District Responses

Six out of seven respondents use crab and dogfish as bait, while the remaining individual uses pollock and dogfish. Bait was reported as being sourced from local commercial suppliers. None of the respondents reported using soft-shell crab as bait.

South of District Responses

Of the twelve individuals surveyed, ten use crab and dogfish as bait, sourced from commercial suppliers. One respondent uses spider crab, which they procure through their own netting activities. The remaining respondent did not specify their bait source, as they conduct offshore fishing activities. None of the respondents reported using soft-shell crab as bait.

4.4. Economic Viability and Market Access

To assess the potential impact of the increase in MCRS on the industry, D&S IFCA sought to gather information regarding the accessibility of markets for selling catch and to identify specific challenges encountered by individuals in this process. Additionally, data regarding the locations where catches are landed was collected.

North of District Responses

None of the respondents have faced any challenges in terms of selling their catch as they all land to a buyer that collects the whelk from them.

South of District Responses

Only two respondents reported facing challenges when selling their catch, and these were centred around pricing. One individual mentioned that the price per kilo for whelk has been lower than expected. A respondent also expressed a belief that a particular buyer/seller has the capacity to influence the pricing of bait and whelk, leading to potential challenges in market pricing dynamics as competitors tend to align with this pricing strategy.

4.5. Future Management and the National Whelk Fisheries Management Plan.

During the interview process, participants were encouraged to share their perspectives on potential management strategies that could contribute to the sustainability of the whelk fishery. It was explicitly stated that their feedback was to be considered as advisory input rather than a commitment or final decision.

The Department for Environment, Food & Rural Affairs (DEFRA) has released a Fisheries Management Plan (FMP) focused on whelk, aimed at promoting the long-term sustainability of whelk populations. A crucial initial management strategy outlined in this plan involves the introduction of a whelk permit or license entitlement. Discussions with respondents were conducted to gather their perspectives on this proposed measure.

North of District Responses

A variety of responses were received in regard to the management. Two respondents believed that the current management seems to be working and therefore nothing needs amending. In contrast to this other suggestions included limiting days at sea, pot limitations,

national MRCS of 55mm, some form of allowance of undersize whelk per total catch before any enforcement action can be taken, stipulation to use certain pots (i.e. like FishTek pots as these have small holes on bottom that allow juveniles to escape), better financial support and education for new and younger entrants into the industry.

With regard to the introduction of a whelk permit or licence entitlement as part of the FMP, respondents had mixed opinions on whether it was a good idea. Three respondents were against the introduction of a permit/licence entitlement. The main reason being that it would restrict fishers from diversifying to this species if other fisheries experience declines and it would provide other boats from further geographic areas the opportunity to enter the fishery. However, these same reasons were also cited as reasons to favour introduction of a permit/licence. The remaining four respondents were in favour of a permit/licence as they believe it may help stop larger Vivier boats from entering the fishery as well as boats that have been displaced from other fisheries. Some of the response extracts are shown below;

“Don’t think fishers should be pigeonholed in terms of what species they are allowed to fish for. If I didn’t get a permit for whelk and then stocks declined on other species I am fishing, I wouldn’t be able to switch to whelk in order to make a living, what am I going to fish for then?”

“If the whelk permits secure the areas for boats and stops the viviers then it’ll be a good thing”

“Potentially a lot of people turn to whelk due to low stocks of other species so this would stop other fishers coming into the fishery”

“I did know about the permit or entitlement as part of the FMP. As long as it is similar to the permit application and permits that are issued currently for potting then it wouldn’t be an issue. If it stops more/bigger boats entering the fishery then it would be helpful”

South of District Responses

Several recommendations were proposed regarding measures to contribute to the future sustainability of the fishery. The predominant suggestion, cited by four individuals, was to lower the MCRS to approximately 50mm. Additionally, two other measures were noted multiple times: the implementation of a closed season (between August to December and end of July to end of December was mentioned, as it is believed spawning season is August to December) and restrictions on pot numbers (a limit of 500 was mentioned by one individual). Other suggestions include introducing a quota and reducing the scallop season to minimise gear conflict and allowing the seabed time to recover.

The discussions regarding the proposed whelk permit or entitlement, which is part of the FMP, indicated that two thirds of respondents (eight) supported the proposal. A condition expressed by some was that the permit or entitlement should not further limit the fishery and should follow a process similar to the existing D&S IFCA Potting Permit application. The primary rationale for supporting a permit or entitlement was the potential to prevent larger vessels from entering the fishery. In terms of how the entitlement or permit is allocated, it was suggested that a track record of historical whelk fishing was taken into consideration. The remaining three individuals voiced their objections to the permit or entitlement based on several factors. They argued that it would impede fishers' ability to adjust and pursue different species when a particular fishery experiences a decline. Furthermore, they believed it would discourage new and younger individuals from entering the fishery. The objectors also expressed concern that the permit would create the impression that the fish stock is the exclusive property of the specific individuals who obtain a permit. Finally, they

perceived the proposal as an attempt by DEFRA to exert control over and limit the fishery. Some of the response extracts are shown below.

“Defra want to licence everything and want to take control of everything. Trying to restrict it. Everyone with a commercial licence has right to fish for whelk and this is just trying to restrict it”.

“Only got set amount of fishers that are whelking. In Lyme Bay have a few bigger boats that work whelks, they decimate the grounds. Might be a good thing if it stops the bigger boats coming into the fishery”.

“No different then applying for permits to go crabbing, netting etc. If they have a limit on whelk that would help”.

“Have to get a potting permit anyway though D&S IFCA. Don't think it's an issue if a permit is brought in”.

“Against all methods like that as authorities are too slow to react. Once you have permit for whelk then you might want to fish for other species and whelk might not be good that particular year. Fishers have to be able to adapt to different species when one fishery starts to drop off. More red tape. Would stop new entrants/ younger fishers from coming in”.

5. Contextualising Responses

This section reviews feedback received from respondents in the context of other available evidence and recent progress in national and IFCA-level management.

5.1. Impact of Increase in MCRS on Landings Per Trip.

Several respondents indicated that landings per trip have declined following the increase in MCRS. This decrease can be anticipated as a consequence of the initial increase in MCRS, which results in a larger number of individuals being returned. This is an important part of the MCRS strategy which aims to allow a larger proportion of the stock to breed at least once before being captured. Any reduction in landings needs to be differentiated between a reduction caused by, for example, stock depletion/mortality and a reduction caused by fishers having to discard previously marketable (but now undersized) individuals. One fisher also noted that “financially it wasn't great when the increase in MCRS came in but that's a selfish approach. As a whole it was the right thing to do as years have gone on catches have gone up”.

It may be possible to assess data on whelk landings to understand the changes in whelk landings since the MCRS increase. Data on whelk landings has been previously requested from the MMO and while this could be used to compare the anecdotal information received from individuals, it has several limitations and therefore cannot be relied upon in isolation to assess any degree of reduction in landings. These limitations will be discussed below;

- 1. Landings data represent retained catch, not total catch** – MMO landings data only record the quantity of whelks that are landed and sold. They do not include; undersized individuals that are returned to sea, catch that is not declared or sold outside official channels.

After an increase in MCRS, fishers may still catch smaller whelks but must discard them. This means a reduction in landings could simply reflect regulatory compliance rather than a change in catch rates or stock abundance.

- 2. Changes in fisher behaviour** – Fishers may respond to the MCRS change in several ways that affect landings data including; moving to different fishing grounds, changing fishing effort for whelk, altering gear configuration (changes in pot types and density which may affect catch efficiency).

Any of these behavioural responses can alter recorded landings independently of stock status.

- 3. Effort is not accounted for** – Landings data alone do not indicate how much effort was used to catch the whelks (e.g. number of pots, days at sea, soak time). A change in landings may therefore result from change in any of these factors.

Without effort data, it is not possible to determine whether the change reflects reduced fishing activity or reduced catch rates. Currently, assessments of landings per unit effort from pre- and post- MCRS change would need to use the 'fishing trip' as the unit of effort.

- 4. Spatial and reporting limitations** – MMO landings data are reported at relatively broad spatial scales (ICES rectangle) and do not therefore reflect local patterns in abundance or fishing activity. In addition, it is not possible to determine from the landings data whether whelk landed are from inside or outside the 6nm and whether this has changed pre- and post- MCRS increase.

Consequently, additional data would need to be obtained in order to accurately assess any trends in reported whelk landings following the increase in MCRS. This is discussed in section 6.

MMO landings data could be assessed on a per-trip basis, taking into account the caveats highlighted above, in order to understand potential changes in landings volumes and values pre- and post- MCRS increase.

This report has dealt primarily with perceived impacts of the MCRS increase on fishers since 2018. The change was made in order to improve sustainability of the stock, by allowing a larger proportion of the stock to breed before entering the fishery. As the lifespan of whelk can be five to seven years, the benefit to the population of the MCRS change will only just be emerging. If a larger number of whelk are able to breed then, subject to the carrying capacity of the environment, this may be expected to increase the overall available stock. Further data collection on the stock would be needed to understand the extent to which this has occurred.

5.2. Perceptions of MCRS and Size of Whelk in the District

Data obtained during D&S IFCA's Size of Sexual Maturity (SOM) studies were reviewed in order to establish whether a representative size frequency distribution could be produced. Unfortunately, this data could not be used due to the methodology of the SOM study only using a sub-sample (10 individuals) of whelk. Whilst this was an appropriate method for assessing SOM, it does not provide a representative picture of the size distributions. Further information gathering would be required to validate claims about spatial variation in the sizes of whelk available in the District.

However, it is not unusual for shell fisheries to have high return rates. Data collected from the lobster fishery in D&S IFCA's District between 2023 to 2025 indicates around 62% of the catch is landable after taking into account restrictions around removal from the fishery of

individuals that are smaller than the MCRS, berried (egg bearing), v-notched or have mutilated tails.

While future implementation of a lower MCRS could provide short-term economic relief to the fishing industry, evidence indicates that a lower MCRS, can lead to overexploitation, as seen with plaice in the English Channel, as well as reduce long-term sustainability as individuals are removed before they have had a chance to reproduce, severely damaging the spawning stock biomass (SSB).

5.3. Use of Soft-Shell Crab as Bait

Whelk fisheries use natural baits to attract and retain whelks in pots. Baits used vary but anecdotal information from fishers suggests that a mix of brown crab and dogfish is the preferred option. Although none of the respondents reported using soft shell crab as bait, there is a market for soft-shelled crab for use as bait in the whelk fishery and it is commonly used as an attractant in the fishery more widely. There are concerns that the market for whelk bait could incentivise the landing of poor-quality crab, putting additional pressure on already declining crab stocks. In addition, removing individuals from the population before they have had a chance to spawn raises concerns on stock sustainability.

The implementation of a prohibition of landing soft-shelled crab for bait will protect crabs at the more vulnerable stage of their life cycle and allow them to reproduce within that moult period. This is intended to protect stocks from over-fishing and to support stock status.

5.4. Implication of a National Whelk Permit Approach

Some respondents raised concerns about fishing effort, particularly from vivier boats and suggested that the permit/ entitlement, as part of the FMP process, might help prevent these boats from entering the fishery. D&S IFCA acknowledges the concerns expressed by fishers concerning vivier boat effort. Changes to D&S IFCA's Potting Permit Conditions took effect from 7th November 2025 which may address these concerns at the scale of D&S IFCA's District. The Potting Permit Conditions now include a provision that states a permit holder or named representative is not authorised, whilst fishing in the District, to store sea fisheries resources in a vivier tank or tanks below the uppermost continuous deck that have a volume that exceeds two cubic meters. Based on the information presented to D&S IFCA's Byelaw and Permitting Sub-Committee (B&PSC), it was the view of the Members of the B&PSC that the prohibition on vessels fitted with vivier tanks will safeguard existing operators against increased levels of effort being applied, in particular from the vivier fleet being displaced from Cornwall and offshore grounds.

5.5. Riddle Use and Proposal for an Allowance of Whelk Below the MCRS

Some respondents suggested an allowance of undersized whelk be introduced as a future management measure, as it can be difficult to ensure all catch is above the MCRS when volumes are high.

In August 2018, D&S IFCA published a guidance document to the industry on the increase in MCRS for whelk. This guidance included a section on using shell widths as guides for the setting of riddle widths and how this would affect the size of the retained catch.

The MCRS (65mm in D&S IFCA's District) refers to shell length, but riddling excludes undersize whelk on the basis of shell width. There is substantial variation between individual whelks in the relationship between shell length and shell width. Although a riddle with 27mm spacing would be expected to allow most of the whelk below MCRS through (to be returned to sea), some retained whelk may be shorter than expected based on their width. It is

possible to take a scientific approach to predict the proportion of whelk that are smaller than the MCRS, but which would still be retained based on a given width and riddle spacing. This could be used to inform any future consideration of an 'undersize allowance', a shift to using shell width to define the MCRS, or recommendations to alter riddle spacing to improve exclusion of undersize whelk, should any of these approaches be considered appropriate.

Whelk riddling speed and method will also directly impact the percentage of undersized catch retained. Rapid or hasty sorting processes tend to result in more smaller individuals passing over the riddle and into the landing bag, rather than falling through it. To optimise efficiency, riddle handling should be carried out in a careful and slow manner.

5.6. Spatial Variation in Whelk Size, and Implications for Use of Consistent MCRS

Information obtained from the interviews suggest whelk vary in size over relatively small spatial scales, particularly between the east and west of the District. It has been suggested that whelks are smaller in the east compared to the west.

Data collected during D&S IFCA's SOM study did not capture the full-size distribution of whelk caught during sampling trips. Instead, for each sample, the whelks were separated into 5mm size classes (e.g. 41 – 45mm, 46 – 50mm), and then a maximum of ten individuals per size class were measured. This means that size classes represented by more than ten individuals were capped at a sample size of ten, so it is not clear from the data how many individuals were in each size class before sub-sampling occurred. However, in cases where fewer than ten individuals per size class were measured, this was because there were not enough of that size class to take the full sub-sample. This gives some insight into which size classes seemed to be less well-represented. Accounting for the caveat above, data collected during the SOM study revealed that around 50% of whelks were below 55mm in Start Bay, whereas the sampling in Exmouth indicated that less than 25% of whelks were below 55mm. Overall, there was higher representation in the 65mm+ size classes in the samples taken from Exmouth than in the samples taken from Start Bay.

These findings provide initial support for the idea that whelk size varies across relatively small spatial scales, although they do not align with the suggestion that whelks are smaller in the east. However, it is important to note that this is based on subsampled data collected between 2014 and 2018, and that potentially whelk sizes may have changed since then due to several biological and environmental reasons (i.e. changes in temperature, salinity, food availability, predation pressure, local adaption) Furthermore, the dataset does not include additional sampling locations further west or east within the District, meaning there may be some spatial variations not identified in the dataset used for the SOM study.

6. Next Steps

The feedback summarised in this report provides valuable insight into how the increase in MCRS has affected the whelk fishery. The views shared by fishers highlight a range of operational, economic and practical impacts, and provides a basis for further assessment and evidence gathering.

Several topics/questions have been identified that may require further exploration as well as highlighting a general need to understand the health of the stock of this non-quota fishery. Potential next steps include:

- **Review of evidence** – Assess consultation responses alongside fisheries data to evaluate the practical impacts of the MCRS change. Using individual permit holders' data on landings per trip as highlighted in section 5.1 would provide a useful step in this respect. As further Inshore Vessel Monitoring System data become available, landings and spatial data could be combined to assess spatial variation in landings per unit effort.
- **Further data collection or research** – Explore options to improve understanding of whelk stocks, catch profiles and fishery dynamics (see Appendix II for list)
- **Ongoing stakeholder engagement** – Continue dialogue with fishers and other stakeholders to ensure that future work reflects both scientific evidence and practical experience.

These actions will help ensure that any future decisions regarding the whelk fishery are informed by a broad evidence base.

7. Conclusions

The consultation has provided valuable insight into the fishers' perceptions of any impact the increase in MCRS has had within the whelk fishery. Key themes emerging from responses include: spatial variation in catch composition (particularly size); operational adjustments; reduction in landings and potential economic implications for vessels. Overall, the feedback highlights both practical and economic considerations that are important for understanding the effects of the MCRS change. Next steps have been highlighted that will be valuable for validating these effects and understanding the stock-level impacts of the MCRS change, which was expected to improve the size of the breeding stock over time. The information gathered in this report could be used alongside other scientific evidence, landings data, and other monitoring information to support future assessment and help inform any subsequent management decisions regarding the whelk fishery.

Appendix I. Telephone questionnaire

Background

Fishers were contacted that had previously indicated they fish for whelk. At the start of the call officers explained the previous work D&S IFCA had done on assessing the Size of Sexual Maturity (SOM) of whelk and as a result of this work increased the MCRS from 45mm to 65mm over a two-year period. It was then explained to fishers that D&S IFCA are now looking to gather data on the whelk fishery to establish what impacts the increase in MCRS may have had on industry and whelk stocks. Fisheries were advised that any information they provide would be confidential and any information used would be anonymised.

The first set of questions focused on the change in the MCRS:

1. Do you think/feel the number of whelk you are getting per pot has changed on average and if so how (has this been generally across all areas or more sporadic i.e. certain areas/ depths etc, can also ask them whether the influx of octopus has had an effect).
2. If your opinion, has the increase in MCRS from 45mm to 65mm for the inshore stock had any impact (positive/ negative) on the fishery and you/ your landings?
3. What were your views on the phased approach to increase the MCRS and what are your views now?

Individuals were thanked for their insight and asked the next set of questions

4. Do you fish inshore (inside the 6nm), offshore (outside the 6nm) or both?
5. If both, how do you approach fishing across the inshore and offshore district given the difference in management (i.e. different MCRS). Do you just fish to the inshore MCRS of 65mm when fishing offshore?
6. What is the spacing on your riddle and do you use the same one for inshore and offshore fishing?
7. Where do you source your bait from?
8. Obviously one of the potting permit conditions is that shellfish as bait within D&S IFCA's District must meet the MCRS for shellfish (e.g. 150mm female crab, 160mm male crab). If a prohibition of using soft shell crab as bait was introduced,
 - i) Would this impact you, please describe how
 - ii) What alternatives are available? Would you still use crab or processed crab?

Fishers were advised that the next set of questions are focused on access to markets

9. Where do you land your catch?
10. How accessible is the market? Can you sell your catch easily?
11. How do you transport your catch to market?
12. How often do you fish for whelk?
13. What type of gear do you use and the amount of gear (i.e. number of pots per string and number of strings)?

It was explained to fishers that the last set of questions were centred on management. It was highlighted that any advice provided by them is for insight only rather than commitment and final decisions.

14. What measures, if any, do you think could help support the future of the fishery?
15. What are your thoughts on the proposed whelk permit/entitlement as part of the whelk Fisheries Management Plan?

Fishers were thanked for their time and then asked if they would be willing to have an officer on board to gather catch information should we need it or provide a bag of unriddled whelks that could be measured at the quayside.

Appendix II. Whelk Fishery Monitoring possibilities

Scenario	Research question(s)	Data collection requirements (M = Minimum; R = Recommended; U = Useful)	Links to other questions & data collection
<p>1) Fishers have suggested that there is spatial variation in the average size of the catch and have expressed concern that the D&S IFCA MCRS is too large given what is caught.</p> <p>The data that were collected for earlier whelk maturity studies were subsamples of the catch (10 whelk per size class) so cannot give an accurate picture of catch size distribution. Also, fishing pressure and/or natural processes may have changed size distributions since those studies were undertaken (over 10 years ago).</p>	<p>What is the size distribution of the catch?</p> <p>Is there spatial variation in the size of the catch?</p> <p>How does the catch composition across the District compare to the MCRS?</p>	<p>M = Quarterly samples of unriddled catch from “normal” pots on sentinel vessels. Spatially stratified according to effort/landings*; neap tides.</p> <p>R = Quarterly whole catch samples from scientific pots[†]. Spatially stratified* and compared to unriddled catch from adjacent “normal” pot; neap tides.</p> <p>U = Regular whole-catch sampling at processor/ data provision by processors.</p> <p>U = Consider use of technology to reduce required effort e.g. measuring size of catch from photos of whelk on standardised grid.</p>	<p>Leads to (2), provides supporting data for (3)</p>
<p>2) If there is significant spatial variation in size distributions <i>and</i> if there are areas where a large proportion of the catch is smaller than the MCRS, this is likely to raise the question of whether the MCRS is suitable to sustain a fishery.</p> <p>Very strongly linked to this is the relationship between the MCRS, size of maturity (L_{50}), and the long-term sustainability of different MCRS scenarios.</p>	<p>How does the size of maturity (measured using L_{50}) vary across the District?</p> <p>What proportion of the catch in each area is larger than the L_{50}?</p> <p>What proportion of the landable whelk are larger than the L_{50}?</p> <p>Are other MCRS scenarios (smaller/larger/area-specific) more suitable?</p> <p>Can L_{50} be used as an SSB indicator (following Emmerson et al 2018 paper)?</p>	<p>M = catch sampling as in scenario 1, supported by biennial dissections of spatially-stratified samples to assess maturity during September – November.</p>	<p>Builds on (1), supports (3)</p>

<p>Reference points for each indicator are calculated from individual growth curves (size at age) or size at maturity estimates and are calculated from survey data. Growth curves are more difficult to calculate due to requirement to age the whelks.</p>			
<p>4) Catches or Landings Per Unit Effort can inform regional stock assessments in the medium to long term. Concern over sustainability of fisheries could be addressed by understanding changes in CPUE or LPUE over time.</p>	<p>Do whelk substocks/ distinct fishing regions vary in their LPUE levels and/or trends? Are there significant (positive or negative) trends in LPUE in regional fisheries?</p>	<p>M = Trip-level landings and effort data (number of pots) from catch recording app and other sources (vessel length-dependent), linked to IVMS data so that LPUE trends can be calculated for fishing locations. R = See considerations below on landings and landings per unit effort</p>	

* Spatial stratification – draw polygons around known fishing grounds (based on previous data collection & IVMS); allocate pots & sampling effort based on area of each polygon (potentially ‘weighted’ by intensity of fishing). Aim for sampling within 1km of specified sampling point (discuss feasibility with fishers). Define polygons at relatively small spatial scale to allow potential delineation of stock boundaries based on size distributions.

†Scientific pots are similar to FishTek pots with smaller mesh size and 10mm drainage holes to retain whole catch.

Quarterly sampling likely targeted to March/April, June/July, September/October and December/January.

Other considerations for Landings & Landings-per-unit-effort

Overall assessment of LPUE trend would be a long-term commitment requiring years of data. It is generally advised that the time series of data required is typically at least as long as the number of ages in the population. This may be around five to seven years, however, may vary in populations with different growth rates. In Welsh waters, researchers have observed a knife-edge age distribution after five years.

Fine-scale effort data for LPUE assessment are difficult to achieve. Options for estimating effort are described below, moving from simplest/coarsest scale to finer scale but more difficult to achieve options.

Unit of effort	Comments	Disadvantages
Trip identity	Simple, coarse assessment. Vessel identity used to standardise analysis, based on assumption that gear set by vessel remains consistent over time. Could be improved by comms to quantify gear changes,	Does not account for: number or type of pots, soak time.
IVMS proxy: Time on fishing grounds:	IVMS data excluding obvious steaming to quantify time on fishing grounds. Based on algorithm detection of fishing patterns that represent potting activity. Soak time could be estimated using consecutive days of fishing effort.	Does not account for number or type of pots. Algorithm development required e.g. based on combination of vessel speed, consistency in heading etc., but possible within R & QGIS. Extensive QA required during development.
IVMS proxy: Number and length of strings	IVMS data assessed to identify obvious strings of pots. Length of string could be extracted using QGIS. Soak time could be estimated using consecutive days of fishing effort.	May be time consuming to identify strings from IVMS data and to measure length, but semi-automation may improve this.
Pots per trip: Catch recording	Effort data from e.g. catch recording app specifying number of pots fished. Could implement QC protocols including a minimum number of pots (E.g. if reported number of pots is lower than a pre-determined threshold, disregard these data in case fisher is reporting number of strings instead of number of pots). Welsh assessment may use threshold of 50.	Data may be unreliable so will need to be checked. Consistency of use will need to be assured for time series of data. Does not account for soak time except in combination with an IVMS proxy approach. Does not account for type of pots.
Pots per trip: Permit returns	Effort data from a new IFCA reporting system, rolled out to Permit holders under Potting Permit Byelaw clause 17. Could build on lessons learned from application of this approach in other Districts. Could account for soak time, type and number of pots. Successful implementation of digital-first approach may lead to	Greater initial investment.

	reduced effort for data collection and assessment over time and provide closer collaboration with Permit holders.	
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Pot-level effort and landings data from fishery-dependent sampling would produce pot-based CPUE trends in the short term and would allow for stock assessment using a 'Bayesian hierarchical surplus production model' in the medium term. However, previous work has shown that that a surplus production model is unlikely to produce reliable estimates of stock size in the absence of a fishery-independent survey data set, small-scale spatial resolution of catches and multiple years of data (perhaps > 15 years).

Sentinel fleet monitoring

Distribute scientific pots (similar to FishTek pots with smaller mesh size and drainage holes) to sentinel vessels for monthly or quarterly sampling of full catch ("red bag scheme"). Spatially stratified sampling in consistent locations – pots distributed to specific areas & vessels based on importance of grounds to fishery (i.e. more sampling from vessels and areas that produce higher landings). Use for full-catch size distribution assessment, comparison with adjacent pot (unriddled) for "caught whelk" vs "available whelk".

Processor monitoring

Improve relationship with processors for regular sampling of length data. Explore opportunities for data sharing if they already collect these data.