

**NWIFCA Technical, Science and Byelaw
Committee**

2nd August 2022: 10:00 a.m.

Agenda Item

12

RESULTS OF THE MUSSEL MINIMUM LANDINGS SIZE CONSULTATION

Purpose: To present the results of the mussel minimum landing size consultation

Recommendation:

1. To accept the conclusions of this report.
2. To agree no immediate action is required regarding the request to reduce MLS, and that further work on mussel MLS should be considered within the development of a mussel management plan.

Overview:

At the Technical Science and Byelaw meeting held on the 10th of May 2022, the Authority was asked to consider a reduction to the current minimum landing size (MLS) of mussels (*Mytilus edulis*) in the District from 45 mm to 40 mm.

It was subsequently resolved that a consultation would be undertaken to determine the view of industry on this matter.

A questionnaire was drafted and approved by TSB by email, before being made available on NWIFCA website on the 29th of June.

Byelaw 3 permit holders and other members of industry were informed of the consultation by news posts on the website, Facebook and Twitter updates, contacted directly by text messages and invited to complete a questionnaire on the 29th of June. Permit holders were reminded again via text on the 8th of July. The questionnaire is provided as an Annex to this Agenda Item.

All relevant members of industry were asked to return their responses to the Authority by the 17th of July. In addition to the questions posed, the consultation also offered the opportunity for industry members to raise any additional information they believe to be relevant to this matter.

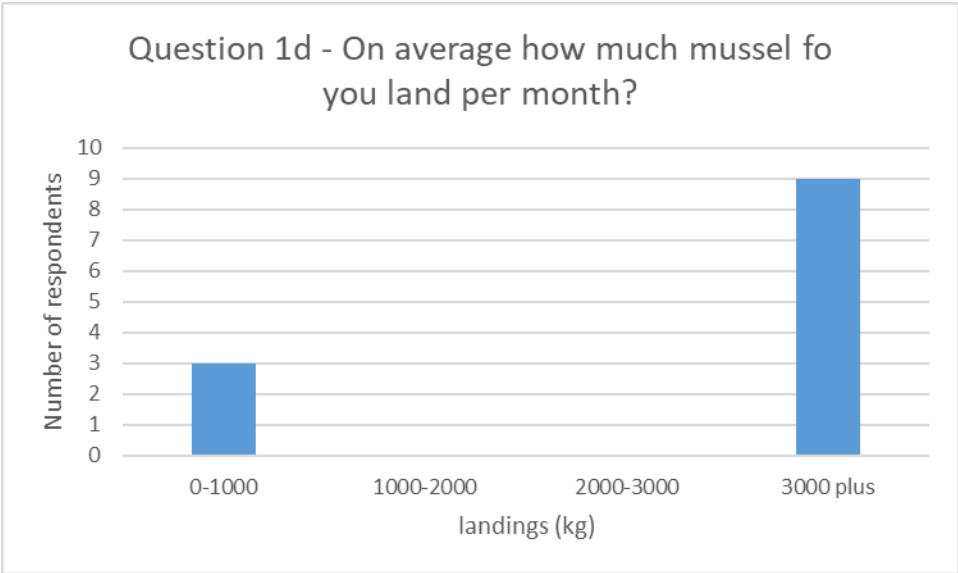
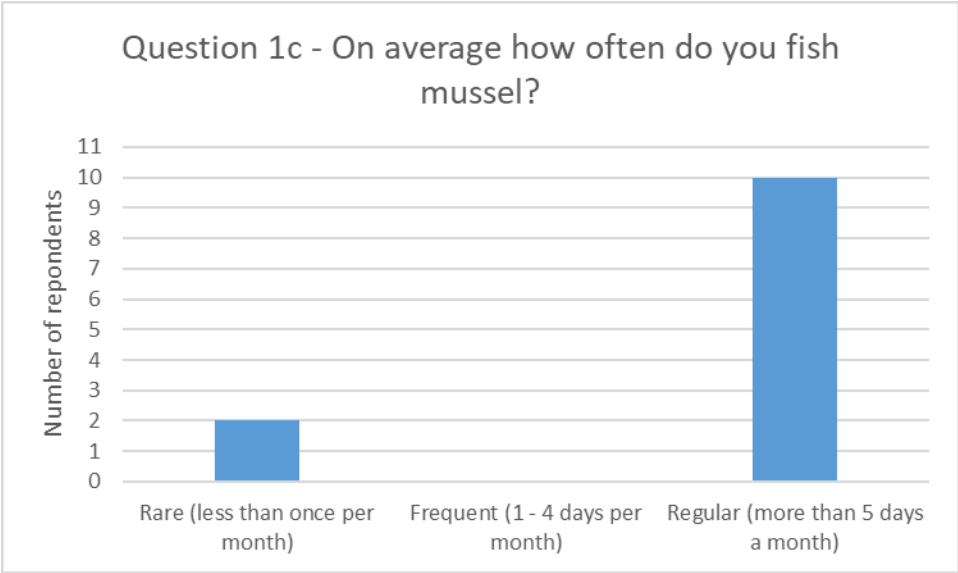
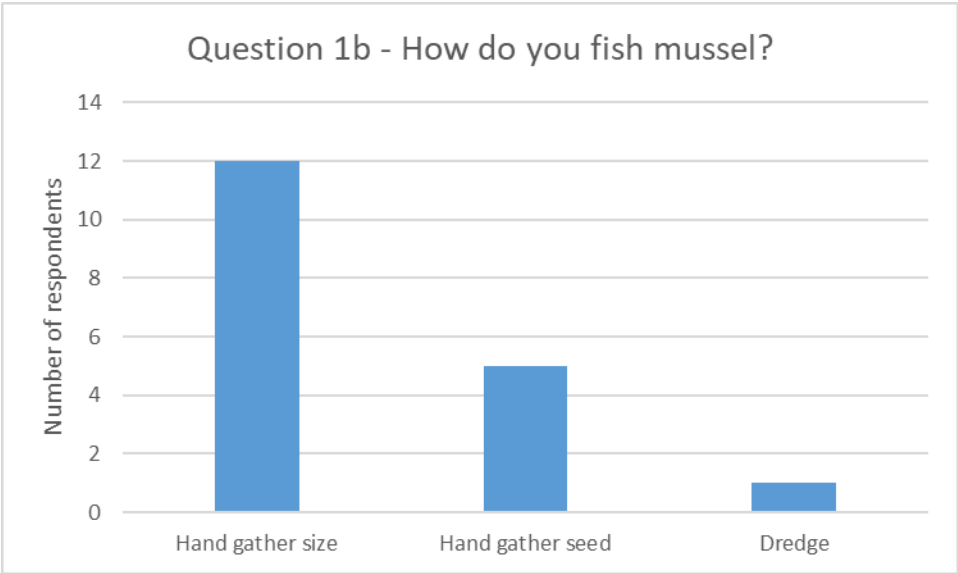
The following constitutes a summary of the responses received.

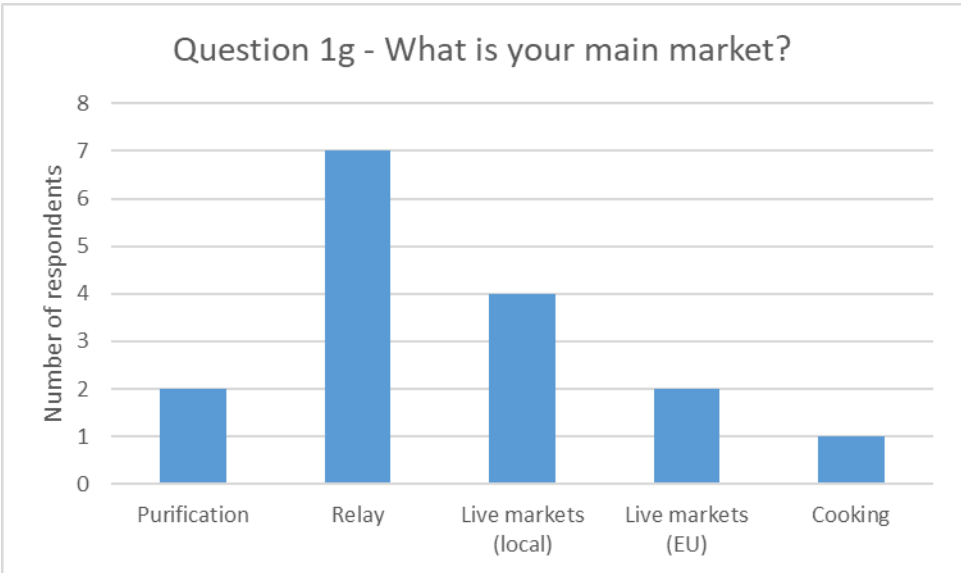
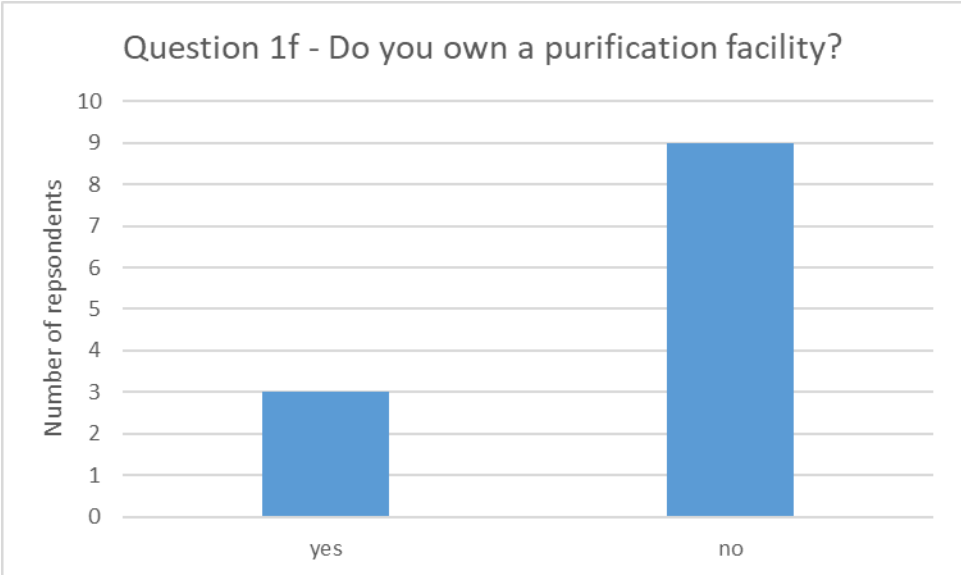
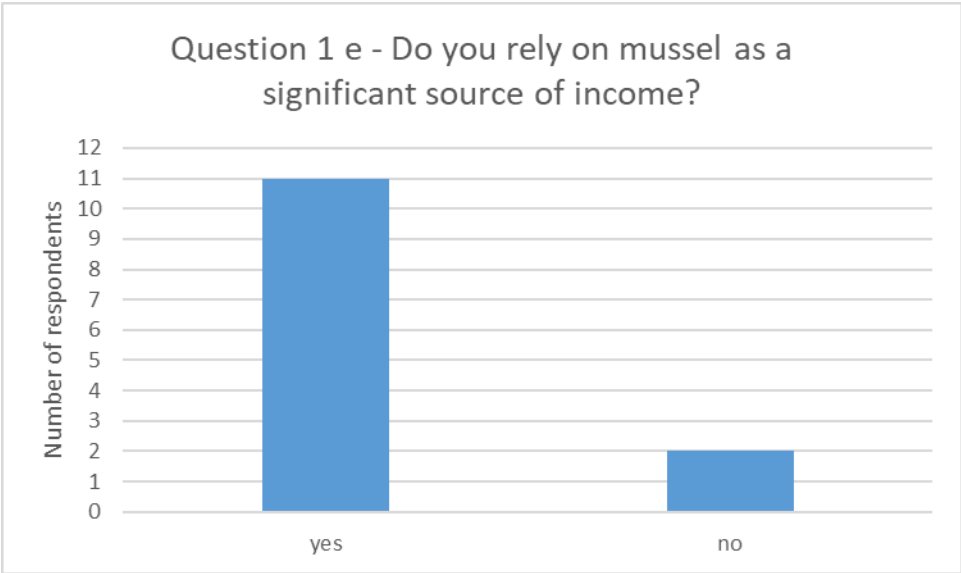
Results:

A total of 14 industry members responded to the questionnaire, of which 12 were commercial fishers.

Question 1 (b-g):

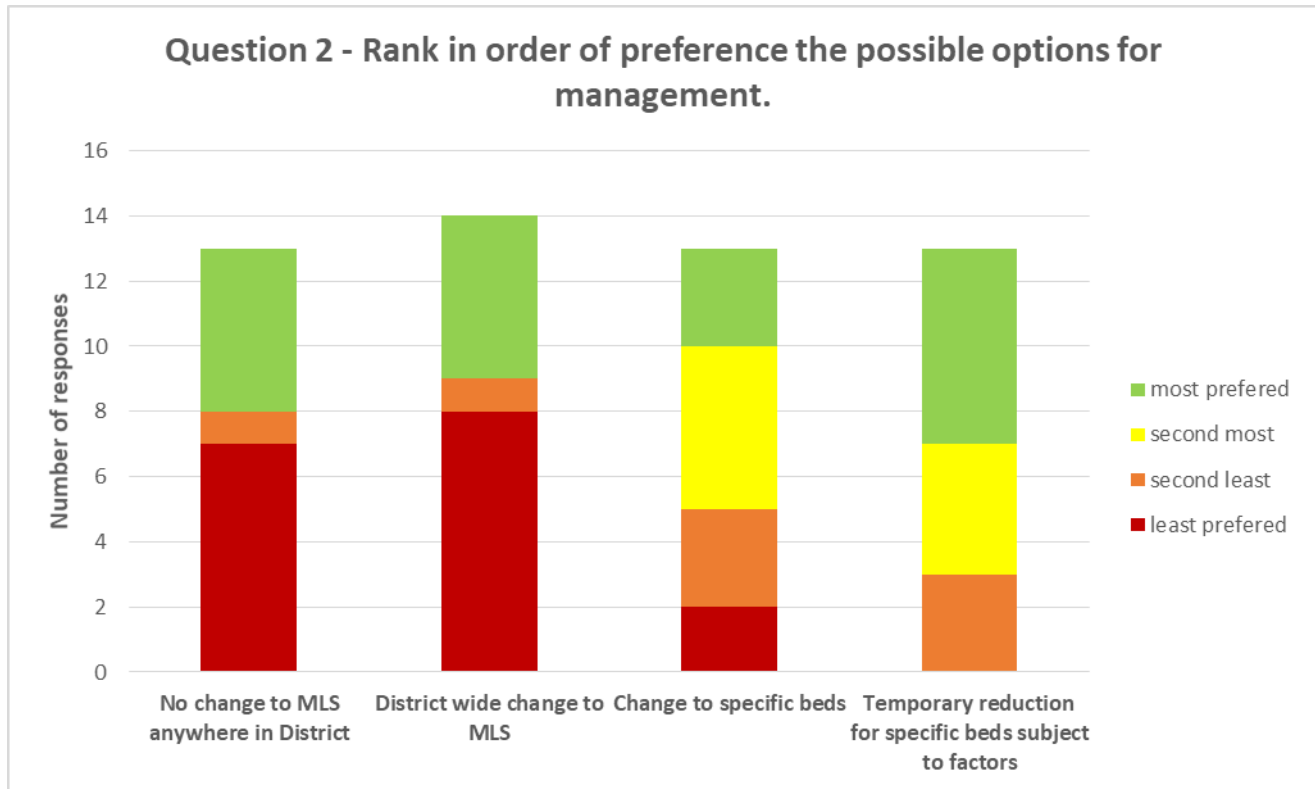
This section focussed on respondent information.





Question 2

Please rank in order of preference (1 = most in favour, 4 = least in favour) the following options:



Scores for each option were tallied and the overall sum of ranks used to determine an order of preference for the options provided.

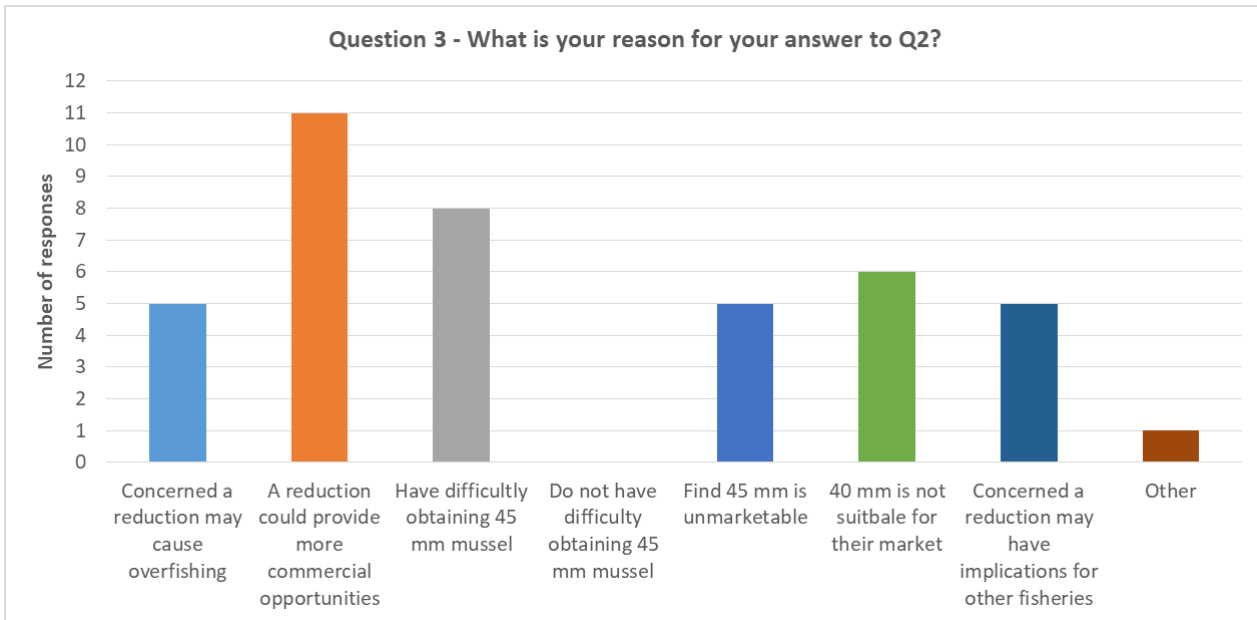
Q2: Options in order of preference:

- 1 Temporary reduction in MLS of specific beds subject to biological assessment
- 2 Reduction of MLS on specific beds
- 3 No change to MLS anywhere in the District
- 4 District wide change to mussel MLS

On inspection of the data, there was a clear difference in the preferred options among fishers. 50% of respondents were least in favour of a district wide change in MLS, and as a whole, considered a temporary reduction in MLS only subject to biological factors as their favourite option. In comparison, the other 50% had their least favourite option as no change in MLS across the district, scored evenly among all other options, but had a greater number preferring a district wide change in MLS as their first choice.

Question 3

What is the reasoning for your answer to question 2? (You may select multiple options):



The highest number of respondents said that their reasoning for their preferred mussel MLS option was that it would increase commercial opportunity for fishers. Eight respondents said that they have difficulty obtaining mussel of 45 mm, but 6 said 40 mm mussel was not suitable for their target market. Five respondents were concerned that a reduction may lead to overfishing and have consequences for other fisheries. No respondents said they did not have difficulty obtaining 45 mm mussel, though additional comments provided in question 4 by some stated that they did not have difficulty with this.

Question 4 - Additional comments provided by respondents:

Topic	Comments
Commercial concerns	<p><i>'Whilst certain people have markets for 40 mm mussel, a lot of pickers do not [...] and it would give these permit holders a monopoly over the bed [...]</i></p> <p><i>'[...] would like to see the cultivation of mussel in the area not see it wiped out.'</i></p> <p><i>'We have spent a lot of money putting in a purification plant and diversified since brexit selling shellfish to the european market, and would like to see the cultivation of mussel in the area.'</i></p> <p><i>'[...] would like to see mussel get to 50mm for the market we supply but realise mussel is washed off in certain areas'</i></p>
Pearling	<p><i>'The mussel in question does get to [45mm] MLS without pearling [...]</i></p> <p><i>'In the higher areas mussels can persist but take 3/4 years to get to legal size and by that time they are unmarketable due to developing pearl, barnacle and turning a undesirable colour. When this happens these mussels don't get fished and simply occupy the ground until it naturally dies, not allowing any new settlements to establish.'</i></p> <p><i>'[...] certain areas in the district have in the past proven to be marketable at 40mm but seem to spoil before they reach 45mm, in particular areas of foulney.'</i></p> <p><i>'The domestic markets require large clean mussels with no barnacles or pearls, and good meats. There is unfortunately no such thing in Morecambe Bay.'</i></p> <p><i>'There is a problem with pearled mussel in the district.'</i></p>
Commercial opportunity	<p><i>'[...] sales of 45mm mussels basically disappeared due the brexit and the fact we can't ship abroad anymore.'</i></p> <p><i>'The main market for Morecambe Bay size mussels has been France. They will take smaller size 35mm to 45mm. Hopefully we will be able to get back into that market in future, so reducing the mls to 40 mm will increase the marketing opportunities.'</i></p> <p><i>'When they [are] 40mm we can start to pick them and the rest will have a chance to grow.'</i></p> <p><i>'We have big issues in the faulney [...] they may be nearing the MLS of 45mm at the end of the growing season [...] this stock then has to survive the next winter in its most vulnerable state. The many storms that we encounter before the next growing season leaves it at risk of being lost to the elements.'</i></p> <p><i>'Thousands of tonnes of mussels never make it to 45mm on higher ground.'</i></p>

'[...] sales of 45mm mussels basically disappeared due the brexit and the fact we can't ship abroad anymore.'

'[...] areas of quick growing mussels like South america/fauklands and most recently duddon seem to be more at risk from adverse weather/shifting channels so I feel that a reduction in them areas would give the fishermen a better opportunity to fish these areas rather than wait and likely lose the stock.'

Concerns over sustainability *'If the mls was reduced it could devastate the beds, although factors temporary on specific beds is acceptable under certain cicumstances.'*

'I think if mls was dropped to 40mm it could lead to the demise of mussel in morecambe bay'

Summary of Results

The majority of respondents were commercial fishers targeting size mussel that regularly fished the mussel beds. 75% of respondents landed >3000 kg of mussel per month, and for nearly all, size mussel made up a significant portion of their income.

Selling to relay markets made up the biggest target market among respondents, followed by local live markets and purification facilities.

Taking the group as a whole, the least popular idea among respondent, was to have district wide reduction in mussel MLS. This was followed by no change at all. The most favoured option was for a temporary reduction of a specific bed determined by biological factors, and the second favourite was for there to be a change on specific beds.

However, the responses were divided among the group as a whole. 50% of fisher's first choice was a temporary, localised reduction subject to biological factors, and their least favourite a district wide change to MLS. In comparison, the other 50% scored no change to MLS as their least favourite option, and weighted the other options equally.

The greatest concerns among fishers were the possibility of overfishing, 40 mm not being suitable for target markets and the reduction having an implication on other fisheries. However, most fishers acknowledged the potential for additional commercial opportunities that could arise from a reduction to 40mm, and over half said they had difficulty obtaining mussel at 45 mm.

Additional comments provided mainly focussed on the difficulty in obtaining 45 mm mussel in the district, identifying areas such as Foulney, which were of particular concern. However, many comments were contradictory with some fishers claiming to have difficulty finding 45 mm mussel while others did not.

NWIFCA recommendation:

Out of ~130 Byelaw 3 permit holders, there are approximately 20 commercial mussel fishers. This number is a conservative estimate based on landings returns since the start of 2021. Out of these 20 permit fishers, 12 replied to the consultation. An additional 2 industry stakeholders responded.

Overall, most respondents were in favour of a temporary, localised reduction in MLS so long as it met certain assessment criteria. A district wide change in MLS was the least desired option, followed by no change at all. Given these results, we can conclude that a permanent reduction in the MLS of mussels across the district, should not be considered further.

Given the mix of responses to the questionnaire, there is clearly differing concerns among industry members, and we must be cautious that one course of action does not provide unfair advantage or disadvantage on the different sectors.

Based on questionnaire responses, the option to introduce a temporary, localised reduction for specific beds subject to meeting biological assessment criteria could be further explored. However, given the interaction between mussel and cockle stocks and bird food requirements for annual HRA's, any further work would need to be sensitive to these issues and requires further study.

Outside of this questionnaire consultation, NWIFCA officers have received little communication from industry that they are in favour of a reduction in mussel MLS, and it has not been considered a matter of concern. In addition, previous consultation work carried out on the same request in 2018 also concluded that there was little interest in reducing mussel MLS.

As agreed management plans are not yet in place, it is recommended that any further work should focus on developing cockle and mussel management plans for the District. Prioritising management plans would serve to benefit a wider number of stakeholders and provide greater clarity on how a temporary, localised reduction in mussel MLS may sit within the greater picture of mussel management in the District.

NWIFCA, 27th July 2022