

ANNEX A

IFCA Bass position statement:

The Inshore Fisheries and Conservation Authorities (IFCAs) have an important role in securing the future sustainable exploitation of bass and we wish to work with national partners to implement measures to address the international decline.

We recognise the need for urgency in light of the international decline and we consider measures must be proportionate in their effects because bass are important to both the recreational and commercial fisheries and because they significantly contribute to coastal economies.

This position statement sets out the views expressed, by the IFCAs, following a meeting with Defra and Cefas officials regarding the future management of bass. The purpose of this letter is to consider which aspects of a management plan are best achieved through IFCA local action and which measures might be better achieved through national measures (identifying therein where we could support such an approach). We recognise that management of inshore fisheries alone will not recover the stock, but that inshore fisheries management has an important role to play in the international management plan. As such the measures we describe here are part of an overall package that is necessary to reduce bass mortality; they are not the whole answer. We recognise other measures are required to achieve outcome of a sustainable bass fishery.

The effectiveness of existing bass nursery area legislation.

The IFCAs consider that there is a need for an immediate review of the effectiveness of the current bass nursery area legislation. For the sake of time, and in the context of the immediate need for action, we think that this should take the form of a light touch amendment to the current instruments as opposed to wholesale redrafting. We hope that this will speed up the process of better protecting bass in these important areas. The purpose of this recommendation is to reduce the mortality of bass in these nursery areas.

We therefore recommend The Bass (Specified Areas) (Prohibition of Fishing) Order 1990 and The Bass (Specified Areas) (Prohibition of Fishing) (Variation) Order 1999 are amended to include

- 1) a deeming clause, which deems any bass has been caught within the BNA when found in the possession of a person who is fishing in a BNA (on a boat or on the shore).
- 2) the restriction of the removal of bass to include fishing (in all forms) from the shore.

The IFCAs will then review netting in these areas and consider the use of local byelaws to augment the protections they afford.

The Creation of new areas.

The IFCAs consider that the identification and creation of more nursery areas (or congregations sites) would contribute further to the necessary reduction in mortality of bass. We consider that the IFCAs are best placed to conduct such a review: we propose to review the near shore netting regulations in particular the relationships between the current management arrangements (legacy byelaws) and their function as bass nursery/congregation areas. We consider that the designation of such areas could be achieved through local byelaws. We consider that the IFCAs are best placed to identify suitable areas and introduce such measures.

Minimum Legal Size

We support the national implementation of a Minimum Legal Size for bass of at least that of Length at Maturity (50%). So as to be effective and proportionate we consider that this measure should apply to both the recreational and commercial sector. If necessary we can support the implementation of this national measure with mesh size requirements where incidence of bycatch could be high in the inshore fisheries. There is an ideal window of opportunity to introduce a national minimum size at a time when the recruitment to the fishery is low.

We consider that only a national bass minimum legal size will have the desired effect of reducing mortality. This is because of the effect of displacement and enforceability.

Bag Limits.

The IFCAs support the introduction of a bag limit to address the weaknesses in the current management of unregistered unlicensed sale of bass. As part of a balanced package of measures a bag limit will also help reduce the mortality associated with recreational sea angling. Estimates of the impacts of sea angling on mortality are not insignificant the majority of this activity is occurring within the IFCAs Districts. IFCAs therefore have a clear role to play. Given that the MMO have indicated reluctance to cross warrant with IFCAs (not a view that is shared by the IFCAs) we consider that the bag limit should be established nationally. We could however introduce such measures if Defra felt this expedient in the interest of efficiency.

Catch Limits

We recognise that this will form a necessary part of a package of measures required to reduce mortality. Given the existing routes to achieve this outcome (i.e. license condition and variation) we would support the monitoring through intelligence sharing with national partners.