

JULY 2020

# HIGHLY PROTECTED MARINE AREAS

Angling Trust Response to the  
Benyon Review June 2020



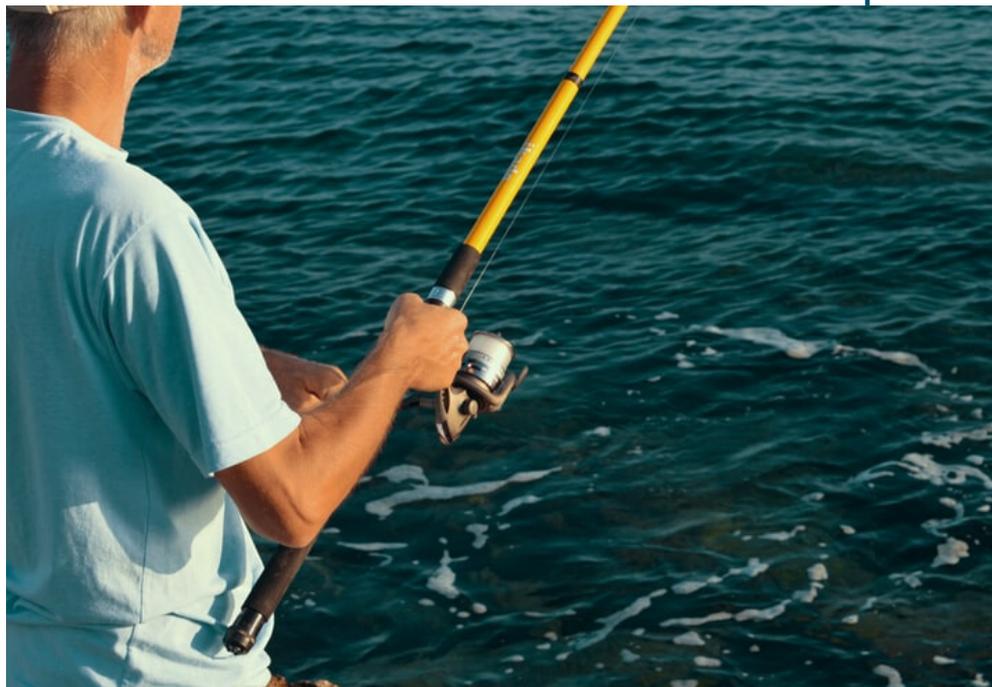
## 1. OBJECTIVES



This briefing paper represents the formal response from the Angling Trust to the Benyon Review Panel's recommendations in respect of recreational sea angling (RSA). It is a key part of our call to Ministers to accept the need for HPMA's but reject those ill-informed aspects of the report relating to angling in favour of a second process of meaningful engagement with the recreational angling sector which would see the creation of specific recreational only buffer zones.

Marine conservation and recreational fishing share the same goals and the Review Panel's recommendation to exclude the angling community from the process has created wholly unnecessary conflict.

As well as setting out the evidence case for some forms of recreational fishing in and around marine protected areas we also highlight some of the best available practice from around the world where the engagement and involvement of the angling community has improved conservation outcomes.





## 2. RECOMMENDATIONS



Read the full Benyon Review here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/890484/hpma-review-final-report.pdf?dm\\_t=0,0,0,0](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/890484/hpma-review-final-report.pdf?dm_t=0,0,0,0)

- The Angling Trust calls upon ministers to accept the case for the introduction of HPMA zones as proposed by the Benyon Review, but to reject those inaccurate aspects of the report that wrongly equate the impacts of modern recreational sea angling as equivalent to damaging industrial activities such as trawling, dredging and drilling, in favour of a second process of meaningful engagement with the recreational angling sector.
- This process must engage the recreational angling community and other stakeholders in examining the potential for the introduction of multi-use marine protection zones that allow for low impact and recreational activities and which protect fish stocks and restore seabed habitats including the creation of specific 'recreational only' buffer zones to operate alongside any new HPMA zones.

### 3. INTRODUCTION



The Angling Trust welcomed the establishment of the Benyon Review into Highly Protected Marine Areas (HMPAs). We shared the concern of many about the parlous state of the oceans in general and of the seas around the coast of the UK in particular. We have a long track record of supporting meaningful marine conservation and believe that the UK lags well behind many other jurisdictions in the scope and quality of our fishery management regime. In Britain we have allowed commercial over-fishing to drive down fish stocks to often unsustainable levels and failed to effectively manage important habitats for fish and other wildlife which would allow for recruitment and recovery. In particular, the absence of specific protections for estuaries and fish nursery areas coupled with the failure to impose spatial and temporal closures on commercial fishing effort where spawning aggregations occur has only served to hasten the decline.

Whilst HMPAs undoubtedly have a role to play in helping our seas to recover, far more radical reforms are needed if meaningful improvements in fish abundance and biodiversity are to occur.

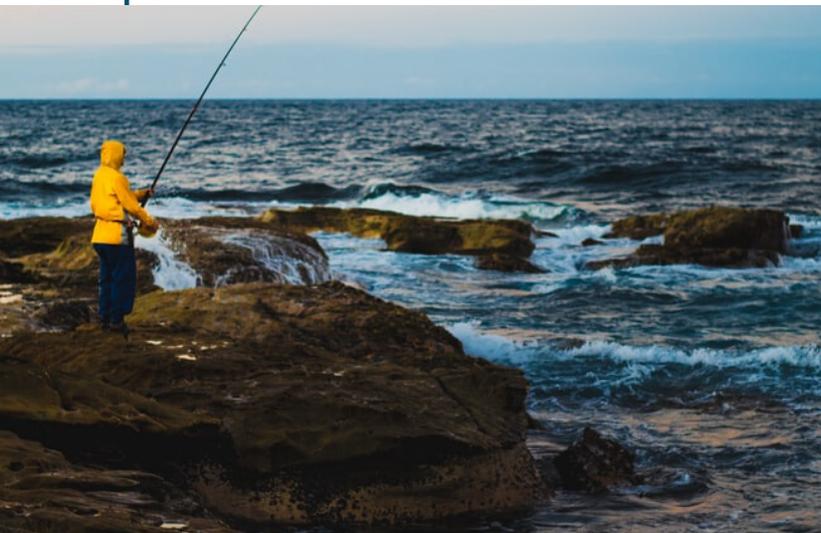
As the national representative body for all forms of recreational fishing the Angling Trust is keen for the sea angling community to be actively involved in all aspects of marine conservation and management. Sea angling generates considerable economic value to the UK economy yet too often it is ignored or marginalised in the decisions taken about the management of our seas upon which our sport depends.

**Sadly, this was the case with the Benyon Review which not only failed to include any representatives of the sea angling sector on the Panel but produced a plainly flawed recommendation for a blanket ban on recreational fishing in HPMAs claiming that the impacts of rod and line fishing are comparable with extractive, commercial exploitation such as dredging, trawling and drilling. This is demonstrably not the case as we demonstrate in our response below.**



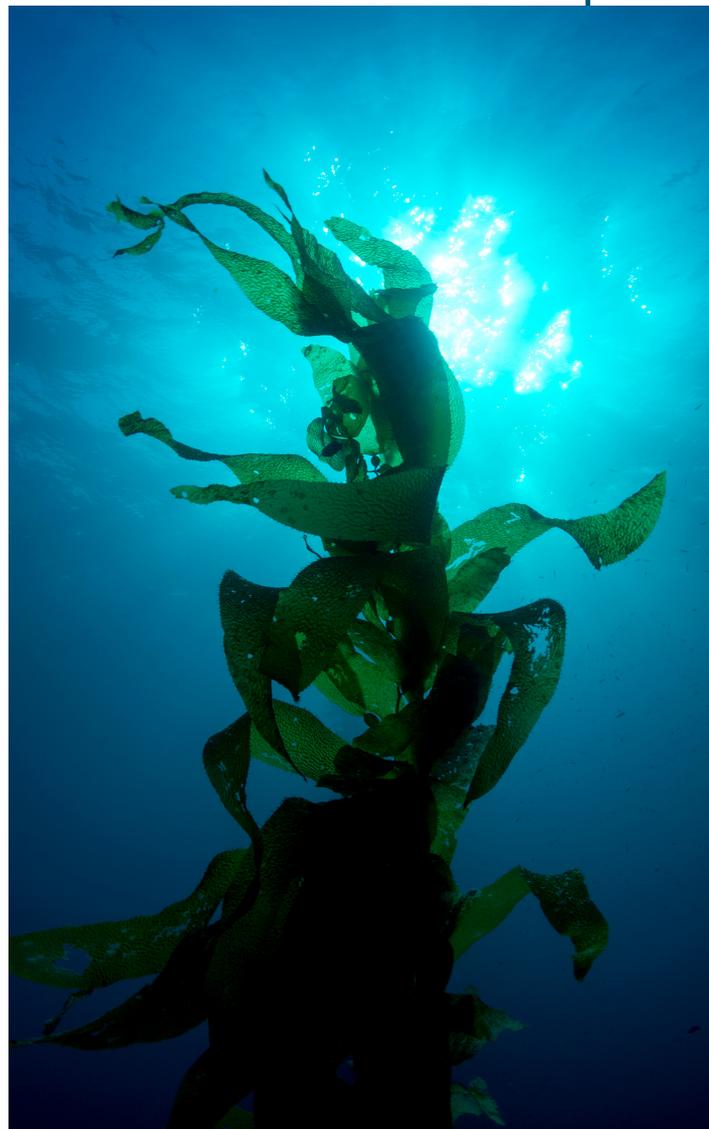
## 4. SUMMARY

- The Angling Trust welcomes the establishment of Highly Protected Marine Areas (HPMAs) and is concerned at the parlous state of the oceans in general and of the seas around the coast of the UK in particular.
- In Britain we have allowed commercial over-fishing to drive down fish stocks to unsustainable levels and failed to effectively manage important habitats for fish and other wildlife.
- Sea angling generates considerable economic value to the UK economy yet too often it is ignored or marginalised in the decisions taken about the management of our seas upon which our sport depends and this was certainly the case with the Benyon Review which failed to include any representatives of the sea angling sector on the Panel.
- Whilst the Angling Trust can support many of the Panel's recommendations we strongly object to their deeply flawed recommendation for a blanket ban on recreational fishing in all HPMAs and their wholly unsubstantiated claims that the impacts of rod and line fishing are comparable with extractive, commercial exploitation such as dredging, trawling and drilling.
- We set out the evidence case for some forms of recreational fishing in and around marine protected areas drawing on best available practice from around the world where the engagement and involvement of the angling community has improved conservation outcomes.



## Angling Trust - Highly Protected Marine Areas Response

- The key points of the Benyon Review are highlighted together with their objectives for HPMA's and the selection of five pilot sites from a list of 45 candidate sites mentioned in the report.
- Rather than exclude recreational anglers (in favour of more expensive activities such as powerboating and scuba diving) we suggest a more rational way forward that will deliver marine conservation objectives, improve stakeholder engagement, reduce economic damage to coastal communities and provide a network of willing volunteers to aid compliance and assist enforcement.
- Experience elsewhere shows how attempts to impose unnecessary restrictions on recreational fishing pushed many anglers into a position of hostility towards conservationists and environmental groups. Marine conservation measures require community and stakeholder support if they are to gain acceptance.
- Most anglers recognise and support genuine environmental action to reverse habitat destruction, protect threatened species and change unsustainable fisheries and land use practices. We need to have recreational fishers fully engaged in promoting policies and programmes that benefit the aquatic environment on which our sport depends.
- Given the lack of meaningful enforcement around our coasts the presence of anglers in and around the HPMA's would be an aid to ensuring compliance and reporting transgressions.
- Whilst there may be an evidenced based case for a complete 'no-take' component in part of some of the new HPMA's these could be surrounded by recreational fishing only zones, as is the case elsewhere, which would enable anglers to benefit from any spill-over effect that would otherwise be hoovered up by waiting commercial fishers.
- We demonstrate how the Panel has misrepresented the conservation benefits of Catch and Release fishing and made no reference to other good fishery management practices that would further minimise the slight impacts of recreational fishing.
- We believe that it should be possible to build wide support amongst stakeholders for the Angling Trust position which has always been to accept the need for HPMA's in principle but to argue in favour of USA-style multi-use MPAs which allow low impact and recreational activities and which protect fish stocks and restore seabed habitats.
- This briefing paper represents the formal response from the Angling Trust to the Benyon Review Panel's recommendations in respect of recreational sea angling (RSA).



## 5. BENYON REVIEW KEY POINTS



Review Panel answered the following questions:

- What are Highly Protected Marine Areas (HPMAs) and should they be part of marine management?
- What opportunities and challenges do HPMAs create?
- How should government select HPMAs?
- How will HPMAs work?
- How should pilot HPMAs be selected?

HPMAs allow marine ecosystems to recover to a mature state. By taking a 'whole site approach' to designation, thereby protecting all habitats and species in their boundaries, HPMAs give nature the best chance to thrive.

HPMAs will support delivery of government's ambition to:

- i. leave nature in a better state than we found it as set out in the 25 Year Environment Plan;
- ii. reach 'Good Environmental Status' as set out in the UK Marine Strategy;
- iii. sustainably manage, protect and preserve the ocean through a co-ordinated approach as set out The Commonwealth Blue Charter;
- iv. conserve at least 10% of coastal and marine areas, consistent with national and international law and based on the best available scientific information as set out the United Nations Sustainable Development Goals (SDGs);
- v. safeguard at least 30% of the world's ocean by 2030, establishing and leading a Global Ocean Alliance;
- vi. be consistent with government's Blue Belt policies for the ocean under its control.

For these reasons, the Panel's headline recommendation is that HPMAs are an essential component of the Marine Protected Areas network, and government should introduce them into Secretary of State waters

## Angling Trust - Highly Protected Marine Areas Response

The Panel made a number of recommendations in support of HPMA introduction, including:

- HPMA's should be defined as areas of the sea that allow the protection and recovery of marine ecosystems. They prohibit extractive, destructive and depositional uses and allow only non-damaging levels of other activities.
- Government and others should use HPMA's as an opportunity to increase public awareness of, and engagement with, the marine environment.
- Government and local authorities should seek to maximise the direct and indirect social, economic and cultural benefits of HPMA designation.
- Government should acknowledge displacement in its decision making during HPMA designation. It should put strategies in place to support marine uses and avoid creating new problems from moving pressures to other parts of the marine environment.
- Government should adopt the principles of transparency and early, continuous engagement with a range of stakeholders in HPMA site consideration.
- Government should use 'best available evidence' to designate HPMA's and should not use a lack of perfect evidence as a reason to delay HPMA designation.
- Government should adopt co-management principles where possible, to agree effective management in partnership with sea users.
- Government must issue guidance on permitted activities within HPMA's, underpinned by a simple categorisation approach aligned to International Union for Conservation of Nature categories.
- Management bodies will need to set out clearly their enforcement responsibilities which will be critical to HPMA success and required by legislation; they should also develop, where possible, voluntary approaches and codes of conduct with stakeholder user groups (particularly for low-impact activities).
- To increase compliance and reduce enforcement demands, government and marine managers should engage with stakeholders early and regularly, on all aspects of the HPMA process.

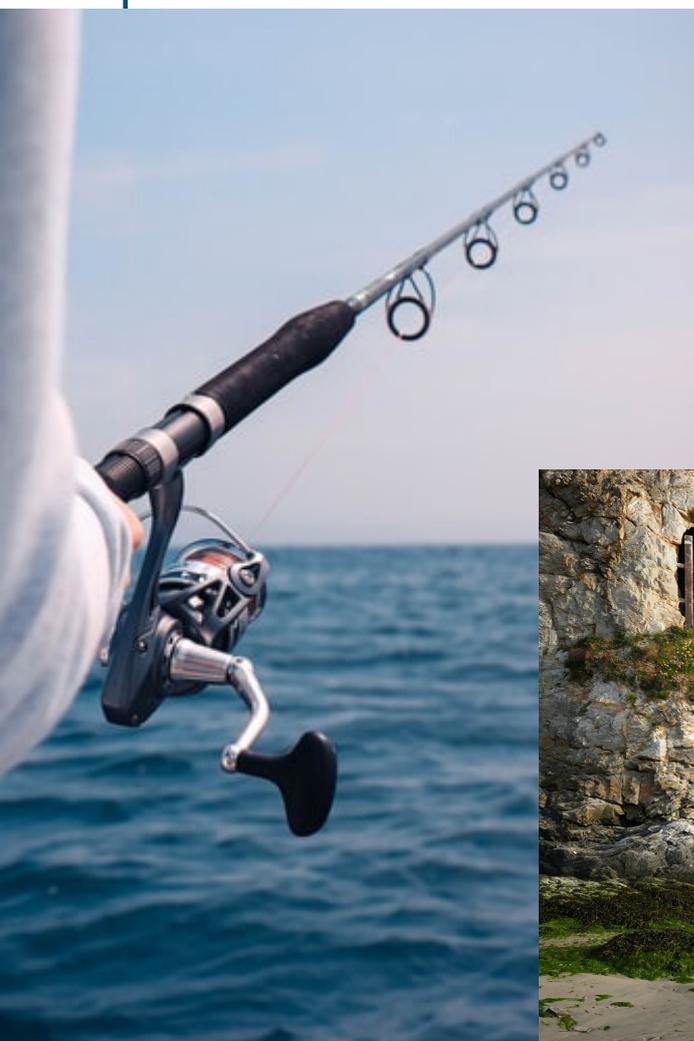
## Angling Trust - Highly Protected Marine Areas Response

### HPMA Site Selection

The Review contained a list of 45 sites around the English coast, including many well-known angling destinations that should be considered for a minimum of five pilot sites to develop as HPMA's from which recreational fishing would be banned. A wider ambition of extending this to 10% of all UK waters has been expressed but is not currently policy.

The Panel's recommendations state:

- Supporting evidence for identifying pilot HPMA's should be taken from a wide a range of sources including statutory bodies, academia, environmental NGOs and industry.
- Government could use the list of sites recommended to the Review as a starting point in any future HPMA process.
- Five pilot sites are the bare minimum and to cover different environments and activities, the number of pilot sites should have sufficient geographic spread to cover nearshore, inshore and offshore areas and different regional seas.



## 6. ANGLING TRUST COMMENTARY



The Angling Trust has highlighted flaws in the Benyon Review where both recommendations and a methodology are at odds with the stated objectives.

Far from the use of 'best available evidence' the Review cherry picks from studies that confirm the already published views of panel members.

Rather than adopting the principles of 'transparency and early, continuous engagement with a range of stakeholders' important partners such recreational anglers were excluded from membership of the Panel and our concerns not even referenced in the final report.

Instead of drawing on examples from other countries where high level marine protection zones include buffer areas designated for recreational fishing only and permitted catch and release and no anchor fishing in other sections, the Panel decided that even low impact recreational fishing should be treated as indistinct from commercial netting and trawling or industrial activities such as construction, drilling and mining.

This is both absurd and disappointing and set out below is a more rational way forward that will deliver marine conservation objectives, improve stakeholder engagement, reduce economic damage to coastal communities and provide a network of willing volunteers to aid compliance and assist enforcement.



## 7. THE FLAWED PROCESS



The Angling Trust has been pressing hard on behalf of recreational sea anglers (RSA) for our voice to be heard by the Review Panel for many months. We argued from the start for RSA to be given a place as of right on the Review Panel, but this was turned down to our extreme annoyance and frustration. We were invited to attend a consultation meeting in October last year in Poole along with commercial fishers and other stakeholders. There was supposed to be a follow up meeting for stakeholders on November 6th, but this was cancelled due to the forthcoming General Election.

We made clear that marine conservation measures shouldn't result in a blanket ban on recreational fishing as our impacts are not comparable with commercial exploitation such as dredging, trawling and drilling. We followed up with a formal response to the public consultation which drew heavily on the [EAA 'Recreational Fishing in MPAs' position paper which we helped write in 2017.](#)

In summary the Angling Trust position was to accept the need for HPMA's in principle but to argue in favour of USA-style multi-use Marine Protected Areas (MPAs) which allow low impact and recreational activities and which protect and restore seabed habitats.

We also made direct approaches to Richard Benyon, as chair of the Review Panel, to once again express our concern at the lack of an RSA presence on the panel and our fear that the eventual recommendations would be skewed against our sector.

When the final report was published on June 8th and it was clear that recreational angling had been dismissed as being part of the problem, rather than the part of the solution. The Report saw a sector worth £2bn to the UK economy as having no role to play in marine conservation. Consequently, [we issued the following press release prior to preparing this response.](#)



## 8. STATE OF OUR SEAS



Recreational sea anglers are uniquely placed to give testament to the alarming decline in abundance of many once common fish species caused primarily by commercial over-fishing and the destruction of habitats essential to promote healthy recruitment of juvenile fish. The practical experiences of sea anglers were reflected out in the government's own 2019 Marine Strategy Review which admitted that:

**“Demersal fish communities are recovering from over- exploitation in the past, but Good Ecological Status (GES) has not yet been achieved in either the Greater North Sea or the Celtic Seas. A partial assessment of pelagic shelf fish did not provide a clear result.”**

As of 2020 some 80 to 90% of the world's fish stocks are either fully fished or over fished and some studies estimate that at current rate of consumption and population growth there may be a global shortage of most available seafood by 2050.

Based on the United Nation Food & Agriculture Organisation assessment, the percentage of stocks fished at biologically unsustainable levels has increased from 10 percent in 1974 to 34.2 percent in 2017.



## Angling Trust - Highly Protected Marine Areas Response

### European Waters

Within EU waters the situation is not a whole lot better despite bold commitments in the revised Common Fisheries Policy (CFP) to end overfishing by this year. Pew Trust reports:

**The CFP actually set a deadline to end overfishing by 2015 “where possible”, with 2020 being the final cut-off date. Yet catch limits for 2020 were set in excess of scientific advice for several fish populations, some of which are heavily depleted, such as Celtic Sea cod. Around 48 per cent of the limits set by ministers for 2020 appear to be higher than the publicly available scientific advice, a worsening of the previous year’s figure (42 per cent), despite the missed deadline.**

Marine conservation measures are rarely embraced by the commercial fishing sector and the National Federation of Fishing Organisations recently made public their ongoing meetings with Defra at which they are seeking to review the rules governing landing obligations which would see the reintroduction of the destructive and unsustainable practice of discards of fish species they are not targeting or fish that are too small to be legally landed.

The introduction of marine conservation measures is important in aiding the recovery of fish stocks alongside the need to end commercial overfishing and unsustainable harvesting. The Angling Trust agrees with the Review Panel when it states:

**Safeguarding areas of the sea from extractive, destructive and depositional uses, while allowing non-damaging levels of other activities, would help government to implement and evidence environmental recovery**

Benyon Review, June 2020

Where we take issue with the Review is in its wholly unfounded statements equating the impacts of all forms recreational angling as equivalent to destructive activities such as dredging, trawling and drilling.

**By taking a ‘whole site approach’ and only permitting certain activities within their boundaries such as vessel transit, scuba diving and kayaking. Activities that could have a damaging effect on habitats or wildlife, including fishing (both commercial and recreational), construction and dredging would be banned.**

Benyon Review, June 2020

## 9. RECREATIONAL FISHING & MARINE CONSERVATION ZONES



The exclusion of anglers from various forms of marine conservation zones around the world has been a highly contentious subject. In the USA considerable steps were made to involve managed levels of recreational fishing in many of these protection zones whereas the mistakes made in Australia, where the recreational fishing community was profoundly alienated, created such a political and public backlash that much needed marine conservation measures were shelved.

There are a number of studies into recreational fishing in marine protection zones which the Review ignored and which we reference below. There are also some prominent conservationists who recognise the valuable role that anglers play in fisheries management and enforcement. Charles Clover, Director of the Blue Marine Foundation and author of the seminal work on the parlous state of global fish stocks - 'End of the Line' - states:

**"It seemed to me that a few areas where commercial fishing was banned , but recreational fishing was not, could have bought crucial support for conservation."**

It is significant that the largest and newest marine reserve in the world, promoted by the Blue Marine Foundation in the British waters around the Chagos Archipelago is to retain recreational fishing in the areas where it is currently practised.

Furthermore, research by the European Anglers' Alliance (EAA) has identified a range of countries and jurisdictions including South Africa, USA, Kenya and the Western Indian Ocean where sport fishing has been allowed to continue in designated marine reserves, often on a catch and release basis.

## Angling Trust - Highly Protected Marine Areas Response

### European Anglers' Alliance

A subsequent EAA report in 2018 set out ten key principles for the successful designation and introduction of marine protection zones and concluded that there were few circumstances where a blanket ban on recreational activities such as angling was either necessary or justified. In fact, they highlighted where marine protection zones had been established to promote reserved areas for recreational fishing. (See Appendix 1)

### Lessons from America

#### NOAA

The highly respected National Oceanic and Atmospheric Administration agency (NOAA) published a paper - 'Marine Protected Areas and Recreational Fishing', which advocates the continuation of recreational fishing in the vast majority of situations and points out that under their National Marine Sanctuary Act, 'an area may be designated as a sanctuary if it is found to be of national significance, due in part to its recreational qualities'. It states:

**Marine Protected Areas (MPAs) have long been used as a conservation tool in the United States and elsewhere in the world. Familiar examples of U.S. MPAs include national marine sanctuaries, national parks and wildlife refuges, many state parks and conservation areas, and a variety of fishery management closures. MPAs in the U.S. encompass many purposes, and most allow recreational uses, including fishing, throughout their boundaries. Fully protected or "no take" MPAs that prohibit all extractive uses account for only a tiny percentage of U.S. waters.**



## Angling Trust - Highly Protected Marine Areas Response

### The Pacific Remote Islands Marine National Monument

In 2014 the Obama administration continued America's bipartisan approach to marine conservation with the creation of the largest marine reserve in the world (at the time) by expanding an existing monument around U.S.-controlled islands and atolls in the central Pacific. The Pacific Remote Islands Marine National Monument is nearly 490,000 square miles, about three times the size of California and six times larger than its previous size. The newly expanded monument is also larger than the sum total of all U.S. national parks on land, which add up to a combined 132,000 square miles. Commercial fishing, dumping, and mining will be prohibited in the reserve, but recreational fishing will be allowed with permits, and boaters may visit the area.

The announcement was seized upon by the recreational fishing sector in Australia who were locked in dispute with their own government's plans for a federal system of marine parks where angling was to be excluded in most cases.

### Lessons from Australia

Attempts to exclude recreational fishing in marine park sanctuary zones in Australia created a highly polarised and destructive debate, pitching anglers against environmentalists and resulting in the creation of single interest political parties whose objective was to oppose any further marine conservation measures. Instead of seeking dialogue with the recreational fishing community the conservation sector adopted a militant anti-angling agenda and drove anglers into alliances with the commercial sector who successfully lobbied to overturn a series of much need federal marine protections.

Other unfortunate examples include:

The recently proposed Sydney Marine Park lacked scientific justification to the extent that the proposed no-take zones had nothing to do with conservation objectives and just reflected the wishes of vested interest groups. Pollution and water quality were by far the biggest issues yet the traditional marine park approach of locking anglers out of popular fishing spots was still the favoured approach proposed. The resulting public uproar saw politicians shelve all plans for the marine park and there were zero conservation outcomes for the area and increased polarisation and ill-feeling.



## Angling Trust - Highly Protected Marine Areas Response

In New South Wales proposed new intertidal protection zones would have outlawed the gathering of weed and sea lettuce on rock platforms for bait. Once it was pointed out that big seas totally remove it anyway and it quickly grows back and that local councils deliberately kill it in their saltwater rock swimming pools to prevent slips the State government quickly reneged in the face of considerable public ridicule.

Environmental groups proposed a huge Coral Sea total exclusion zone which would have outlawed recreational angling in one of the most remote seas in the world. This triggered a successful campaign to establish a more sensible zone-based system but again, lasting damage was done to the relationship between anglers and conservationists.

Policy is beginning to shift in some States in favour of a new approach of threat and risk assessments which are showing that the major issues affecting the marine environment involve pollution, poor water quality, habitat destruction, development, catchment issues (ie, land clearing, agricultural run-off) and other factors such as shipping, dredging and drilling. Extractive fishing is a risk but it's often of a lower order than other issues.

Changes to some previously contentious marine protection zones from which anglers were excluded without reason have now occurred. The recent government review of the Batemans Marine Park in New South Wales has resulted in at least one former sanctuary area being designated as a catch and release zone. The same review has resulted in a number of other no-fishing sanctuary zones being opened up to recreational fishing, albeit with specific restrictions to protect important features such as no anchoring on seagrass beds and no bait fishing in known grey nurse shark locations.

There has been some gradual acceptance that better results for the marine environment would result from managing recreational and commercial fishing far more effectively - with strict quotas and tight bag and size limits augmented as needed by seasonal closures - and an encompassing approach to restoring habitat, reducing pollution and improving water quality. There are few issues associated with discreet areas with no fishing whatsoever to allow for research but in the same light, other areas are set aside to allow for low impact recreational fishing.



## Angling Trust - Highly Protected Marine Areas Response

### Studies on Recreational Fishing and Marine Conservation Zones

Just as the Review panel chose to cite reports in favour of excluding recreational fishing from marine protection zones there are many studies which illustrate the value of involving anglers and limited impacts that they have on the local environment.

Amongst these reports by:

Alós J. and Arlinghaus R. (2012) Impacts of partial marine protected areas on coastal fish communities exploited by recreational angling. Fisheries Research. <https://doi.org/10.1016/j.fishres.2012.09.007>

**The usefulness of partial marine protected areas (MPA) that implement some form of fisheries management regulations, but do not ban fishing and the take of fish entirely, has been questioned due its perceived limited conservation benefits. Here, we provide empirical data demonstrating fish conservation benefits of partial MPA when the stocks in question are mainly exploited by recreational angling.**



## Angling Trust - Highly Protected Marine Areas Response

Cooke, S.J., Hogan, Z.S., Butcher, P.A., Stokesbury, M.J.W., Raghavan, R., Gallagher, A.J., Hammerschlag, N., and Danylchuk, A.J. (2014) Angling for endangered fish: conservation problem or conservation action? *Fish and Fisheries*.  
<https://doi.org/10.1111/faf.12076>

**However, as revealed by several case-studies, there is much evidence that anglers are vocal and effective proponents of fish and habitat conservation, and for endangered species, they are often the only voice when other stakeholders are not engaged. Anglers may contribute directly to conservation actions via user fees (e.g. licences), philanthropic donations or by volunteering in research, education and restoration activities.**



Cooke, S.J., Danylchuk, A.J., Danylchuk, S.E., Suski, C.D., and Goldberg, T.L. (2006) Is catch-and-release recreational angling compatible with no-take marine protected areas? *Ocean & Coastal Management*. 49: 342-354

**Marine protected areas (MPAs) have become a common conservation and management tool for reducing exploitation from the commercial and recreational fisheries sectors. However, the recreational fisheries sector has the potential to be compatible with no-take MPAs when catch-and-release angling is practiced because, in theory, no fish are actually harvested. This**

**presumes that the effects of catch-and-release angling and related activities do not cause appreciable declines in fish populations as a result of direct mortality, sub-lethal effects, or indirect effects on fish habitats, or other problems contrary to the goal of a given MPA. Here, we explore the idea that recreational catch-and-release angling may be compatible with some no-take MPAs provided there are no substantive negative ecological consequences.**



## Angling Trust - Highly Protected Marine Areas Response

Venturini, S., Campodonico, P., Cappanera, V., Fanciulli, G., and Cattaneo Vietti, R. (2017) Recreational fisheries in Portofino Marine Protected Area, Italy: Some implications for the management. *Fisheries Management and Ecology*. <https://doi.org/10.1111/fme.12241>

**Since the 1970s, recreational fishing has become a mass hobby in Italy, reaching a large number of people, who, using modern equipment, increased their harvesting capacity, provoking serious conflicts with the professional fisheries. Recreational fishing is strictly regulated inside Italian Marine Protected Areas (MPAs) and is generally allocated to local residents, mainly to reduce the tensions caused by limitations of access to the resources. The aim of this study was to provide an analysis of recreational fishing activities within the Portofino MPA (Mediterranean Sea), to assess the possible impact on the local fish stocks and to plan potential management actions.**



## 10. CATCH AND RELEASE FISHING



Catch and release (C&R) fishing now makes use of best available techniques including circle hooks and braided line to avoid deep hooking and release weights to minimise the effects of baurotrauma. Evidence from tagging studies shows that healthy repeat captures are commonplace. However, the Review Panel make spurious claims regarding RSA impacts and C&R mortalities.

On pages 65-66 the Benyon Review states:

**“During the site visit to Poole and at round-table events, the Panel heard that most sea anglers operate a catch-and-release policy. By operating this policy and others, such as gear modifications and fish handling techniques, the sea angling community is taking steps to minimise its environmental impact. However, capturing fish, even if not fatal in the first instance, will reduce the life span of an animal if captured repeatedly. The effort expended by the fish in the process may leave it exhausted and vulnerable to predation. Moreover, depending on the time of year and location, angling may negatively impact breeding behaviour despite a range of reported post-release mortalities. As a result, catch-and-release angling is likely to have an impact on the health and mortality of fish and therefore conflict with the goals of HPMAs. We do not believe that angling (catch-and-release or otherwise) is compatible with HPMAs.”**

However, there a number of reputable studies showing more realistic impacts of C&R fishing which the Panel chose to ignore, including:

Ferter, K et al. (2013) Unexpectedly high catch-and-release rates in European marine recreational fisheries: implications for science and management. ICES Journal of Marine Science. <https://doi.org/10.1093/icesjms/fst104>.

**While catch-and-release (C&R) is a well-known practice in several European freshwater recreational fisheries, studies on the magnitude and impact of this practice in European marine recreational fisheries are limited. To provide an overview of the practice and magnitude of C&R among marine recreational anglers in Europe, the existing knowledge of C&R and its potential associated release mortality was collected and summarized. The present study revealed that in several European countries over half of the total recreational catch is released by marine anglers.**

## Angling Trust - Highly Protected Marine Areas Response

Several other studies have shown that the survival of fish released after being caught by hook and line can be high for some marine species, with post-release mortalities of less than 15% (e.g. Albin and Karpov, 1998; Duffy, 2002; Bartholomew and Bohnsack, 2005). Cooke et al. (2006), and make the case that C&R could even be compatible with no-take marine protected areas, provided that lethal and sublethal effects on the released fish are low, and that there are no negative ecological consequences for the ecosystem.

### Catch and Release Studies NSW Australia DPI (2013)

One of the most comprehensive studies into the impact of catch and release angling on fish mortality was undertaken by the Department of Primary industries in Australia and can be found either in [full here](#) and [summarised here](#). The results are discussed further in relation to marine protected areas in Appendix 2.

The report concluded that catch and release zones had compatibility with areas of higher protection in Marine Parks stating:

**The recreational fishing sector has the potential to be compatible with no-take marine parks when catch and release (C&R) fishing is practised because, in theory, no fish are actually harvested (extracted) (Cooke et al 2006). Catch and release research undertaken by DPI has shown that most fish survive after release, and that catch and release fishing is effective for managing and conserving stocks. While these results are considered to be very positive, it is also clear that for many species, survival can be improved and adverse effects to the health of individuals can be further reduced if appropriate catch and release practices are chosen.**



## 11. OTHER ACTIVITIES TO BE PERMITTED INSIDE HPMAS



Despite evidence of higher levels of harm and disturbance to sensitive marine ecosystems the Panel made the quite extraordinary recommendation that activities such as powerboating, scuba diving, surfing and sea kayaking could be allowed to continue unrestricted in the proposed HPMAs yet recreational fishing was not to be tolerated. Comment has already been made of the high cost of many of these activities compared to angling which will effectively lock out poorer income families from these zones.

There have been a number of studies that highlight threats to marine ecosystems from the very activities that the Panel are suggesting be permitted in HPMAs.

These include:

- Hardiman, N. and Burgin, S. (2010) Recreational impacts on the fauna of Australian coastal marine ecosystems. *Journal of Environmental Management*. [10.1016/j.jenvman.2010.06.012](https://doi.org/10.1016/j.jenvman.2010.06.012)
- Lynch, T.P., Wilkinson, E., Melling, L., Hamilton, R., MacReady, A. and Feary, S. (2004) Conflict and Impacts of Divers and Anglers in a Marine Park. *Environmental Management*. [10.1007/s00267-003-3014-6](https://doi.org/10.1007/s00267-003-3014-6)



## 12. ECONOMICS



Recreational sea angling makes a significant economic contribution to both the UK in general and coastal communities in particular. The Review Panel noted that RSA generates a GVA of £847m against £784m for commercial fishing.

### Sea Angling 2012

This study of Recreational Sea Angling carried out by CEFAS for Defra showed:

- There are 884,000 sea anglers in England who directly pump £1.23 billion p.a. into the economy (£2.1 billion including induced and indirect impacts)
- 10,400 full time jobs are dependent on sea angling (23,600 jobs including induced and indirect impacts)

### Tourism

Invest in Fish (West of England Study) was a Defra funded project (cost £1.6 million) that was launched in 2004 and ran until 2007. The objective was to examine ways in which fish stocks might be restored and included a study of the demographics and economic impacts of recreational sea angling. The headline figures are:

- 240,900 south west residents go sea angling, whose cumulative expenditure in the south west was £110 million. In addition, visitors spend 750,000 days sea angling in the region and spend £55 million in so doing. Therefore, recreational sea angling across the south west generates a total of £165 million of expenditure on tackle, bait, specialist clothing, charter boats, boat ownership, mooring fees, chandlery, travel, accommodation, etc.
- The report concluded that management policies should aim to increase the size of fish caught as well as the number of fish caught. Overall, increasing the size of fish will have a larger impact than increasing the catch per day.

The Recreational Sea Angling sector is of significant importance in terms of its economic contribution and the health and well being benefits that it brings. It deserves to be treated as a full partner in decisions that impact upon the marine environment.

## 13. CONCLUSIONS



The dangers associated with the polarisation of the debate over Marine Parks in Australia and elsewhere should have sounded alarm bells for the Benyon Review and was a point we tried in vain to get the panel to address.

Proposed restrictions on recreational fishing pushed many anglers into a position of hostility towards conservationists and environmental groups. This is in danger of happening right now in the UK and is not where we need to be nor where we should be. Marine conservation measures require community and stakeholder support if they are to gain acceptance.

Most anglers recognise and support genuine environmental action to reverse habitat destruction, protect threatened species and change unsustainable fisheries and land use practices. We need to have recreational fishers fully engaged in promoting policies and programmes that benefit the aquatic environment on which our sport depends.

Given the lack of meaningful enforcement around our coasts the presence of anglers in and around the HPMAs would be an aid to ensure compliance and report transgressions.

We believe that it should be possible to build wide support amongst stakeholders for the Angling Trust position which has always been to accept the need for HPMAs in principle but to argue in favour of USA-style multi-use MPAs which allow low impact and recreational activities and which protect fish stocks and restore seabed habitats.

Whilst there may be an evidenced based case for a complete 'no-take' component in part of some of the new HPMAs these could be surrounded by recreational fishing only zones, as is the case elsewhere, which would enable anglers to benefit from any spill-over effect which would otherwise be hoovered up by waiting commercial fishers.



## Angling Trust - Highly Protected Marine Areas Response

Anglers are often involved with scientific fish tagging projects, such as bass, tuna and elasmobranchs, which couldn't be conducted without angling volunteers due to the cost implications. The presence of anglers in HPMAs and other MPAs are of importance for monitoring and data collection, which are big cost obstacles according to the Benyon Review:



**“To create a robust monitoring and data collection framework within HPMAs, government will need to make available significant resources proportional to the HPMAs size. Funding requirements are likely to be higher than those directed to existing MPAs.”**

Managed recreational fishing in other marine protection zones include components designed to aid conservation and fisheries management, including:

- Fishing to bag and size limits
- No anchoring where seabed protection is an objective
- Catch and Release and the use of circle hooks to ensure recovery.
- Temporal and spatial closures to protect spawning aggregations



Catch and Release (C&R) fishing is misrepresented in the Benyon Review as causing inevitable harm to almost every fish caught when in fact studies show mortality rates as low as 5% for European seabass and similar results for many other species. Tagging studies also illustrate healthy recovery by previous caught fish.

## 14. APPENDICES

### APPENDIX 1 - EAA (summary) position on Recreational Angling in Marine Protected Areas

- ① Successful MPAs protect, conserve or restore the habitat or the species population(s) for which they are designated, as well as preserve and support sustainable activities and exploitations, like well-managed recreational angling and tourism. Proper control and enforcement of an MPA is crucial for its success.
- ② EAA supports MPAs for all the good reasons listed in the definition(s) of marine protected areas - in particular the protection of habitat which creates/restores ecosystems, increasing biodiversity and biomass, as well as MPAs for the protection of spawning aggregations and juvenile fish.
- ③ EAA strongly supports scientifically based management of our marine and freshwater resources, including MPAs. Anglers have a long tradition in cooperating with scientists, also with regard to protected areas.
- ④ EAA believes and promotes that the objectives for an MPA should include both environmental as well as societal objectives to achieve a win-win situation for conservation and recreational activities, which engage people in the stewardship of the marine environment.
- ⑤ EAA supports multi-use MPAs that take into account socio-economics and the needs of local communities. There is no need to ban all human activities in most MPAs. This will become clear when access and use rules are made proportionate and appropriate with the MPA's objectives.
- ⑥ Existing MPAs are often zoned i.e. have one or more highly protected zones or hot spots, surrounded by other zones where certain activities are allowed. Recreational angling most often is allowed in all open zones while some low impact commercial fishing activities/gear can be allowed in the lesser protected zones.
- ⑦ EAA supports public access to marine and freshwater fishery resources for consumptive recreational activities where appropriate and under management systems for resource sustainability. EAA urges evidence to be provided of the impact of recreational sea angling (rod & line) on the objectives of any MPA before any management measures for recreational fishing are introduced. EAA urges, when management measures for the recreational fishing sector are discussed, that the recreational segments (rod & line, nets, pots, spears..) are discussed and addressed individually in their own right as these segments' impact on the habitat and stocks are different, and the socio-economics generated vary considerably.

## Angling Trust - Highly Protected Marine Areas Response

⑧ Less than one per cent of MPAs prohibit recreational angling. In fact, some MPAs have as a specific objective to preserve and support good recreational angling in the MPA area. Angling is very rarely a limiting factor in achieving favourable conservation status in Natura 2000 marine areas and other MPAs' objectives. To the contrary, legal human presence in MPAs can help avoid or keep down illegal human presence and use of the MPA.

⑨ The recreational angling activity fits and supports very well UN and EU policies and strategies to "conserve and sustainably use the oceans, seas and marine resources" (1); the EU's "Blue Growth Strategy" (2), which brings together economic growth and sustainable ecosystems in one coherent policy; the "Initiative for the sustainable development of the blue economy in the western Mediterranean", which has as one target "20% increase in off-season tourism" (3); in tandem with EU environment conservation policies and legislation like the NATURA 2000 network (4), and the Marine Strategy Framework Directive (5).

⑩ EAA recommends the US approach and model of designating MPAs which acknowledges the importance of recreational activities: "MPAs share conservation as a primary goal, but many were also established to encourage recreational uses" (6)

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Links:

(1) UN sustainable goal 14: [www.un.org/sustainabledevelopment/oceans](http://www.un.org/sustainabledevelopment/oceans)

(2) [https://ec.europa.eu/maritimeaffairs/policy/blue\\_growth\\_en](https://ec.europa.eu/maritimeaffairs/policy/blue_growth_en)

(3) [https://ec.europa.eu/maritimeaffairs/sites/maritimeaffairs/files/docs/publications/blue-economy-in-the-western-mediterranean\\_en.pdf](https://ec.europa.eu/maritimeaffairs/sites/maritimeaffairs/files/docs/publications/blue-economy-in-the-western-mediterranean_en.pdf)

(4) [http://ec.europa.eu/environment/nature/natura2000/index\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/index_en.htm)

(5) [http://ec.europa.eu/environment/marine/eu-coast-and-marine-policy/marine-strategy-framework-directive/index\\_en.htm](http://ec.europa.eu/environment/marine/eu-coast-and-marine-policy/marine-strategy-framework-directive/index_en.htm)

(6) Marine Protected Areas and Recreational Fishing; NOAA leaflet

[https://nmsmarineprotectedareas.blob.core.windows.net/marineprotectedareas-prod/media/archive/pdf/helpful-resources/mpas\\_rec\\_fish.pdf](https://nmsmarineprotectedareas.blob.core.windows.net/marineprotectedareas-prod/media/archive/pdf/helpful-resources/mpas_rec_fish.pdf)

### **APPENDIX 2 - Catch and release zones – consideration of compatibility with areas of higher protection in Marine Parks - NSW Australia (2018)**

<https://www.dpi.nsw.gov.au/fishing/recreational/fishing-skills/catch-and-release>

#### EXTRACT

The recreational fishing sector has the potential to be compatible with no-take marine parks when catch and release (C&R) fishing is practised because, in theory, no fish are actually harvested (extracted) (Cooke et al 2006). Catch and release research undertaken by NSW DPI has shown that most fish survive after release, and that catch and release fishing is effective for managing and conserving stocks. While these results are considered to be very positive, it is also clear that for many species, survival can be improved and adverse effects to the health of individuals can be further reduced if appropriate catch and release practices are chosen. Further information on catch and release survival and best practice techniques can be found in the NSW DPI publication – Recreational Fishing Catch and Release Handbook and on the NSW DPI website.

There are many benefits to providing some limited, low impact, access for fishing to areas of higher environmental protection within marine parks. There are numerous recognised low impact fishing techniques and appropriate rules that can be applied to these areas to ensure the access provided is consistent with marine park values. The benefits include maintaining the many social and economic benefits of recreational fishing as well as maintaining public support by providing access to these areas. It is also considered that by providing access to areas of higher protection, the fishing benefits will be recognised by the anglers and this may result in more broadly changed fishing behaviours, such as increased C&R practices, when fishing in other areas less regulated, thus resulting in wider conservation benefits for the whole fish population. This type of behaviour change has been seen after anglers have participated in fishing competitions with C&R rules or fished in other locations with an increased C&R ethic.

It also must be remembered that closing areas to recreational fishing doesn't result in reduced recreational fishing effort overall, it merely squeezes the fishing pressure into a smaller space thus increasing the intensity of fishing. This "displaced effort" has been reported to have negative environmental consequences (Gardner 2016) and also increases the level of conflict between fishers, thus impacting on social values.

## Angling Trust - Highly Protected Marine Areas Response

There are many other activities that are currently permitted in highly protected "Sanctuary Zone" areas in Marine Parks that compromise the conservation objectives of marine reserves. This includes: motor boating (and anchoring), scuba diving, snorkelling, jet skiing, wildlife observation etc. A number of these can potentially have similar or greater impacts than catch and release fishing (Thurstan et al 2012), therefore it is considered that providing access to other non-extractive uses without allowing any form of fishing is providing an unfair allocation of the resource. A better outcome may be achieved by providing some areas of high protection with no access for any user group and larger areas of higher protection where access is permitted to activities that are considered non-extractive – including C&R fishing.

### Low impact recreational fishing options

There are many varied management rules that can be applied and adapted to minimise impact from recreational fishing.

These rules include:

- No boat anchoring - to limit habitat damage
- More stringent rules - such as reduced bag limit and increased size limits to reduce harvest.

Method rules:

- Lure fishing only - to reduce incidences of deep hooking and to limit catch of sharks.
- Circle hook only - to allow bait fishing but to promote mouth hooking of fish.
- Barbless hook only - to speed up unhooking
- Trolling by lure only - to limit catch to pelagic species even further and promote mouth hooking of those species

No harvest rules:

- Catch and release only - to prevent harvest of any fish from that area

These rules can be used singularly or collectively to provide an appropriate range of rules to provide low impact recreational fishing within a marine protected area.

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Further information on catch and release survival and best practice techniques can be found in the DPI publication – Recreational Fishing Catch and Release Handbook and on the DPI website <https://www.dpi.nsw.gov.au/fishing/recreational/fishing-skills/catch-and-release>