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Submitted Friday 18th August 2023

Angling Trust Response to “Proposed removal of the quota finfish licence cap on English 10 metre and under vessels” Consultation

Question 1: Do you agree with the proposed removal of the licence cap from English u10m fleet vessels?

No.

Question 2: What is the reason for your answer for Question 1?

Our marine environment is in poor condition with many stocks either overfished or heading in that direction. Latest ICES Advice (2024) indicates that, largely, we should be reducing fishing pressure across many quota and non-quota species, therefore while the consultation document intends to provide reassurances that removing the licensing cap will not exceed quotas, it seems at odds with the latest scientific advice. It is simply not ambitious enough, or in our view in line with the UK Government’s ambition for “World-Class Fisheries”, for an increase in fishing pressure to be a priority at this time.

We believe the current proposal has the potential to create many loopholes that may undermine the sustainability of inshore fisheries and have unforeseen consequences on both the marine environment and the socio-economic impacts on inshore recreational fisheries. Many commercial finfish species, quota and non-quota, are also of recreational interest and importance. In the consultation document it does not appear due diligence has been undertaken to assess and examine the potential impacts of the removal of this license cap on recreational fisheries, particularly shore angling.

Within the consultation document there are references to challenging market conditions which may have been influenced by various world events. When the market conditions are poor, landing more fish for less value is not the correct solution and instead invites overfishing.

The position that the license cap cannot continue on a temporary basis because “*it provides no certainty that this quota will be made available permanently*” is also at odds with the scientific advice and negotiation process. Given the volatile state of our fisheries, particularly in light of climate change, there should be no guarantees regarding future quota or scientific advice. As referenced within the consultation document, the total allowable catch (TAC) across the fleet

with access to quota should not, under any circumstances, exceed scientific advice and as seek to establish the UK as possessing “World-Class Fisheries” we should ensure the health and recover of our fish stocks is a priority.

Question 3: What impact do you think removing the licence cap will have?

It is highly likely that the removal of the license cap will increase pressure on inshore fishing grounds, which in turn will have unintended consequences on the health and experience of, and benefits derived from, inshore recreational fisheries. With recreational fisheries now a named stakeholder under the Fisheries Act (2020) we believe that more attention must be paid to the ramifications this license cap removal will have on those fisheries. Many shore anglers’ fish from the same mark, particularly those who are elderly or have mobility issues, and are unable to move to different fishing locations like fishing vessels can.

Given the state of our marine environment, and the objectives outlined in the Joint Fisheries Statement, it is bizarre that the government is looking to increase fishing pressure. This seems to be a move to appease the commercial fishing industry, rather than acting in the interests of coastal communities and ecosystem-based management at large. As per 2.1.4 in the Joint Fisheries Statement, *“The fisheries policy authorities will place emphasis on rebuilding stocks and protecting the environment. This will need to be delivered in a manner that is sensitive to the needs of fishing interests, including coastal communities, takes account of wider environmental factors.”*

We believe this potential presents a loophole that could allow larger vessels to land considerable quantities of fish via smaller vessels that possess this uncapped license. This presents a significant risk for IUU fishing.

From the provided data within the consultation over 2020 to 2022, i.e., 2 years:

- Total amount of quota has increased by 70%
- Total excess over the 350kg cap has increased by 275%
- Number of vessels exceeding 350kg has increased by 400%
- Number of vessels exceeding 350kg as a portion of the vessels with a capped license has increased by 471%

These figures do not indicate to us that there has not been an increase in fishing effort or pressure.

Question 4: Is there anything else you would like to share in relation to the proposal of removing the licence cap?

Further questions that we have in relation to the proposal to remove the licensing cap:

- What is the anticipated impact on the recreational sea angling sector, particularly shore-based anglers?

- Has an assessment been undertaken to quantify the expected impact to inshore targeted finfish stocks and non-quota species caught as bycatch or discarded?
- Will uncapped license holders be able to obtain a bass entitlement?
- Will uncapped license holders be able to buy extra kW's?
- Will license holders need to pay a fee to get these licenses upgraded to uncapped?
- Where is the evidence that there is a market available to support this expansion?
- What contingency plan will the government introduce in the event that quota is overfished as a result of the license cap being removed?
- Regarding gear type, will there be incentives for less environmentally damaging gear such as rod and reel over netting and trawls? What gear types are most likely to be used by these vessels and is it compatible with the objectives of the Joint Fisheries Statement and relevant FMPs?
- Landing data for several quota finfish species in 2022 demonstrates that only 55% of the quota was utilised – Plaice 46.1%, Whiting 55%, Megrim Sole 50.5% and Pollack 33.9%. What evidence has been gathered and is available for sharing to indicate that this is due to a reduction in commercial fishing effort and not a result of historic and current overfishing?
- From 2020 onwards, a total of 107 vessels have utilised the temporary lifting of the cap, what effect has the increase in pressure had on other species through bycatch and discards?
- How was the data included within this consultation document obtained and verified from the U10 sector?

Whilst the Angling Trust is concerned about the future sustainability of affected targeted quota species and discarded/bycaught non-quota species should the proposed license cap be removed, the Angling Trust is also concerned about the opposite: implications for non-quota stocks, should the license cap stay in place due to increased fishing effort as there are landing restrictions on quota species. Both scenarios will have impacts on the recreational sea angling sector, and the wider marine environment, and we welcome discussions to identify the best path forward for coastal communities and the marine environment.