



# Bass Fishery Management Plan

## Guidance Notes for Sea Anglers

Bass anglers, we need you! The English and Welsh Governments are currently consulting on their plans for the bass fishery and they want to hear your views.

The Angling Trust want the Bass FMP to:

- Deliver equal access to the bass fishery
- Protects juvenile and spawning bass
- Minimises discards
- Phase out inshore netting
- Follow scientific advice
- Raise the MCRS and implement a slot size

We have prepared the following guidance document for recreational sea anglers who want to respond to the consultation. It is important that **you make your response unique to you** and use it as an opportunity to share your views. This document is intended to be guidance only and only pertains to section 2 of the Bass Fishery Management Plan Consultation which relates to questions on the proposed fishery management plan.

The Seabass Fishery Management Plan consultation closes on **1st October 2023**. It is important that as many members of the recreational sea angling community as possible respond to the consultation with their views. If you want to have your say on the current state of the bass fishery, and plans for the future, this is the biggest opportunity to do so.



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### Question 1 - Do you have any comments on the process for developing the Bass FMP?

YES...

- The Angling Trust supported the Policy Lab stakeholder engagement process as a way of gathering stakeholder opinions and consensus on the various aspects of the bass fishery management plan being considered by Defra. However, there was **considerable confusion**, and **subsequent tensions**, surrounding the **timelines of these processes** and the **publication of the results**. While we felt this method of compiling stakeholder views was superior to those used in other Fisheries Management Plans, it also **generated a significant amount of stakeholder fatigue**.
- We strongly encourage stakeholder engagement coordinators to **define a delivery and output timeline to maintain stakeholder expectations**. We also feel this **process must be streamlined to reduce stakeholder fatigue and burden**. Communication is integral to the effectiveness of fishery management plan stakeholder engagement, and **we encourage Defra and its associated arms-length bodies to invest in a communications delivery plan with aspects tailored toward the recreational sea angling sector**.
- Defra predominantly engaged with stakeholders via existing engagement groups: Regional Fisheries Groups and the Finfish Advisory Group. Whilst this is understandable in theory, in reality, **our view is that it didn't offer a balanced opportunity for stakeholders to engage largely due to a lack of representation from recreational stakeholders through these groups**.
- There **should be a tailored recruitment drive to promote these opportunities to recreational angling stakeholders**. Similarly, for Future Fisheries Management Live events, given their importance, these events should have been more widely advertised and tailored toward all stakeholders, not just the commercial fishing industry.



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**Question 2 - What are your views about the evidence presented on the current state of bass stocks in English and Welsh waters and can you provide any other evidence, which supports or differs from ours?**

- Latest ICES (International Council for the Exploration of the Sea) advice **indicates that spawning stock biomass (SSB) remains below safe limits**
- ICES advise that **removals in 2024 should be reduced** due to persistent low recruitment
- The bass stock has recently dipped below the limit reference point (Blim), and ongoing efforts to rehabilitate the seabass population to sustainable levels are **at risk of being compromised if adequate control and enforcement mechanisms are not in place, particularly surrounding illegal targeting of bass and discards.**
- **Raise the Minimum Conservation Reference Size (MCRS) to 48cm.** The current 42cm limit does not allow sufficient protections for fish to spawn once before they're removed from the population.
- Minimum mesh sizes for netters and trawls are not larger enough to protect juvenile bass. **We want the minimum mesh size to be raised to 110mm.** It is imperative to take more decisive actions to curtail the capture of undersized fish by improving selectivity and employing spatial management techniques.
- Defra appear to have **ignored evidence to support managing the bass fishery for recreational benefit**





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### Question 3 - Do you agree that these goals are appropriate for domestic management priorities within the Bass FMP?

**NO...**

Overall we agree with the direction of travel for many of the Bass FMP goals; however, **they lack ambition for delivering a world-class fishery** and are vague which **creates concerns regarding Defra's intentions to deviate away from business-as-usual.**

Some key points to consider:

- There is **limited recognition of the socio-economic benefits** recreational bass fishing can generate and contribute to coastal communities.
- There is **limited recognition of allocating fishing opportunities in line with the benefits generated** by recreational and commercial fishers
- Defra appear to ignore the FMP goal of "sustainable harvesting" as the **stock is not currently managed within sustainable limits**, as evidenced by ICES advice for 2024.
- Defra is appear to ignore the FMP goal of "Protecting juvenile and spawning bass" by allowing commercial fishers to target spawning aggregations and **not adopting temporary closures and minimum mesh sizes.**
- Fisheries management should **focus on restoring a natural age and size structure within the bass stock**



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### Question 4 - Do you agree that these actions are appropriate short-term priorities for the Bass FMP?

**NO...**

We agree that the follow actions are suitable and necessary short-term actions for the Seabass FMP that must be implemented within the first 3 years of the enactment of the fishery management plan.

- The establishment of government bass management groups to facilitate stakeholder participation in management decisions
- Exploring opportunities to develop more adaptive management systems which protect the stock and allow fisheries to take advantage of any increases in stock abundance
- Reviewing the most suitable timing and duration of the closed seasons
- Considering how best to monitor and reduce discarding, for example, using existing data recording tools like the CatchApp and/or managed access (within existing annual limits) in return for data.
- Encourage better monitoring, the use of gear modifications and engagement with relevant schemes to help reduce the incidence of sensitive species bycatch associated with bass fishing
- Improving communication and understanding of bass regulations, including Registered Buyers and Sellers (RBS)

**However**, we are disappointed that **there are no actions focused on close season for netting of bass during November to January and in nursery areas**, which is critical to protecting the bass stock from further decline.

We also want to see short-term actions focused on **increasing the minimum mesh size** to reduce bycatch of endangered, threatened and protected species including migratory fish like salmonids.

We also believe more focus should be on **reviewing the current harvest strategy to prioritise restoring a natural larger age and size stock structure** within the bass stock.



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### Question 5 - Do you agree that this approach outlines suitable medium-long term priorities for the Bass FMP?

#### NO...

We would advocate for the following actions to be moved from medium-long term priorities to short-term priorities for the Seabass FMP:

- Reviewing appropriate size limits for the bass stock, for example, a MCRS or slot sizes
- Reviewing appropriate harvest strategies for bass in light of outcomes from the International Council for the Exploration of the Sea (ICES) 2023-23 benchmarking exercise
- Reviewing the practice of shallow inshore and shore-based netting to determine whether additional protections are needed to prevent migratory fish bycatch.
- Investigating the possibility of implementing a percentage catch composition definition of bass bycatch for net fishers
- Improving collaboration between regulators on targeted enforcement and alignment of powers to ensure consistency

We agree that the follow actions are suitable medium-long term actions for the Seabass FMP:

- Improving sector equality so that regulations apply to all those fishing for bass
- Encouraging participation in Remote Electronic Monitoring (REM) early-adopter programmes where appropriate to improve data collection on discards and sensitive species bycatch
- Supporting industry to decarbonise and adapt to the impacts of environmental change on bass distribution and abundance

**However**, many of these actions focus on “reviewing” evidence rather than acting on the existing evidence base. **We want Defra to take more decisive action faster to protect juvenile bass, capitalise on the socio-economic benefits of recreational angling and promote the recovery of the bass stock.**





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### **Question 6 - How would you like to be involved in the delivery of the plan and the future management of the English and Welsh bass fishery?**

The Angling Trust would like to **play an active role in management discussions for the bass fishery management plan**. Recreational fisheries are a newly recognised stakeholder under the Fisheries Act (2020) and as a result there are many opportunities and challenges facing the sector due to the growing need for recreational fishery engagement in policy, science and management, particularly within the fisheries management plan process. If the intention is for stakeholders to deliver aspects of a fishery management plan, then there is a dire need for **government to support the sector through investment in the financial resourcing required**.

We believe the government must **make stronger efforts to ensure engagement from sea anglers through existing structures such as Defra's Regional Fisheries Groups are well supported**.

### **Question 7 - Are there any important connections with or links to other fisheries that we should consider when finalising this FMP or during its implementation process?**

An important connection that must be considered when finalising this FMP is the **overlap of bass fisheries and salmon and sea trout distributions**. Salmonids are highly protected species, falling under a large swath of legislation and international agreements, including the UK's membership to the North Atlantic Salmon Conservation Organisation (NASCO). This means the UK has **an international responsibility to protect salmon and sea trout across freshwater and marine environments**. When finalising and implementing this FMP, it is crucial that Defra does so in a way that upholds the UK's many commitments to these species.