



We welcome the opportunity to comment on Roger Cook's report on sea angling in Wales. He is to be congratulated on the depth of his analysis and the production of such a wide-ranging draft discussion paper.

The following responses are based on our understanding of the general views of our members and many other sea angling groups, who share our concerns about the future of our inshore fisheries, upon which our sport depends.

2.2 Significance of sea angling to Wales

We have been encouraged by the attitude to all forms of angling by the Welsh Assembly Government and applaud this latest initiative, in developing further the sea angling experience for domestic and visiting anglers.

Whilst criteria like hospitality, good access, an attractive environment enhance the Recreational Sea Angling (RSA) product, the quality of the fishing available is the most important single factor by far in persuading both local and visiting anglers to fish and continue fishing in Wales. Research into angler motivation establishes that participation levels in angling are directly related to the size and quantity of fish species available for capture. This factor is often referred to as the *fish availability threshold*.

We enclose some data from the State of Maryland, in the United States, which demonstrates the number of angler trips increasing in direct proportion to the growth of the striped bass stock following the implementation of the striped bass restoration scheme. See www.asmfc.org - About us (Striped Bass Act) - managed species- striped bass, for further information.

A sympathetic structural framework is a prerequisite to the development of RSA and the delay in the development of RSA in Wales is in many ways directly attributable to structural failures. There are signs structural weaknesses are being remedied, but it remains to be seen whether the structure will evolve sufficiently to allow RSA to be fully developed in Wales and further afield in Europe. Equally, there is a suspicion that structural restraints on the development of RSA are at times over-stated.

We agree with the comment in 2.3 (6) that "it is dramatically obvious that there is considerable scope for the further development of the sport" and that logistical and marketing factors have a role to play, so long as it is remembered that the success of logistical and marketing campaigns ultimately rest on the quality of the RSA experience Wales is able to offer and the health and abundance of fish stocks must therefore remain centre stage. It might even be said that healthy fish stocks i.e. fish stocks reflecting their natural age range, stocks with a reasonable number of older fish in large and specimen sizes, are capable of selling themselves.

3. Conservation Issues.

The potential that RSA offers the economy of Wales can only be fully developed when conservation measures are seen to be in place.

Knowledge that measures encouraging the development of RSA are in place, act as a powerful marketing device in their own right.

For example: The Bass Order prohibiting the sale of bass in Eire, sends a very clear message to sea anglers in other countries about the quality of Irish bass fishing.

A variety of conservation measures can be used to improve fish stocks for RSA. They may include, for example, effort controls or zonal restrictions, or a combination of both e.g. bass nursery areas, or even specific fish species conservation schemes, where exploitation patterns are controlled right down to the last detail.

Once in place it is very important to publicise the conservation measures to maximise their marketing value.

An excellent example of detailed management measures of specific species can be found at www.asmfc.org The Atlantic States Marine Fisheries Commission web-site.

Click on “about us” see the Striped Bass Act

Also “Interstate Fisheries Management”

Also “striped bass”

In New Zealand there is further evidence of this approach -

www.fish.govt.nz/recreational click on “Kingfish”

Both the above schemes fix quotas for important recreational and commercial fisheries. The same also applies in Australia, to barramundi www.fish.wa.gov.au – ‘recreational fishing’

A fixed allocation, has the advantage of recognising RSA’s stake in a stock in a tangible way. Unless RSA’s rights are fully recognised there is a real risk that more efficient exploiters will gradually increase effort directed at traditionally RSA species and subsequently claim a stronger right of exploitation. The recent rapid growth in commercial effort directed at the bass stock provides a dramatic example.

“Prior to the mid 1970’s, bass were regarded as a sport fish, the development of the commercial fishery being a fairly recent phenomenon” (extract from 1987 MAFF Lab. Leaflet 59).

The following comment, in the Salmon & Trout Association’s response underline the growing popularity of sea angling particularly for bass as well as the increasing trend for crossover between sea angling and freshwater angling *“We have an interest in the consultation because increasing numbers of our members are fly-fishing in salt water for bass, which is one of the fastest growing sectors of angling. Indeed with global warming threatening to severely limit traditional salmon and trout angling during the summer months, especially in the South of England and Wales, fly-fishing for bass will become even more important for S&TA members in future.”*

Conservation measures, which fully reflect the growing importance of recreational bass fishing need to be implemented today. Fisheries managers should be planning

15 to 20 years ahead with bass and many other important recreational species, in order to secure potential economic rewards in future years.

3.2 Commercial catching

The commercial catching sector of the fishing industry has enjoyed a monopoly of sea fisheries policy and management to date. Indeed, the Association of Sea Fisheries Committees argued just a few years ago, that UK sea fisheries policy should continue to prioritize commercial fisheries in order to meet the public's dietary requirement for fish. This argument overlooks the fact that very little of the fin-fish consumed in the UK today is caught by the UK fleet and that the potential for the UK fleet to meet consumer demand from UK waters is remote, due to the severely depleted state of many native fish stocks.

(www.defra.gov.uk/corporate/consult/gov-response-seafish/sfia-reviewfinalreport.pdf

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*“37. Over the 25 years since 1981, there has been a very substantial increase in the amount of fish which is imported into the UK from foreign catchers for processing and/or consumption. **Only a relatively small proportion of the fish now consumed in the UK is caught by the UK fleet while much of the fish caught by the UK fleet is exported.** The health of the UK catching sector is no longer of such central importance to the UK seafood industry.”*

Recreational Sea Angling with rod & line cannot compete with the efficiency of commercial fish catching techniques, but it does have the significant advantage of producing high rewards from low levels of fish mortality - a real bonus when many stocks are over-fished, or subject to draconian recovery plans. RSA cannot be developed to reach its maximum economic potential unless commercial exploitation of important RSA species is more rigorously controlled.

Whilst it is possible to increase the mesh size of nets to allow fish to reach larger sizes, trawling is not generally a size selective method and mortality rates of immature fish from trawling are known to be high.

Inshore waters form important nursery areas for many species of fish and given high levels of by-catch and resulting depletion in many fish stocks there is a strong case for the prohibition of trawling throughout inshore waters, at very least out to 1 mile from shore.

The Bass Management Plan's proposal for a one mile, no netting zone has wide-spread appeal and support, at a time when the public is increasingly aware of the environmental negatives associated with less selective and often destructive fishing gear and fisheries managers are seeking to encourage environmentally friendly fishing. It would mean that controlled recreational and commercial line only fishing would be allowed within one mile from shore.

We are pleased to enclose a copy of the Bass Management Plan (BMP) in addition to this submission.

3.3 Aquaculture.

Studies carried out abroad appear to suggest that the returns to Wales PLC from a fully developed RSA product are likely to be far greater than the returns of fin-fish aquaculture.

In the circumstances, one wonders whether the risks aquaculture presents, to more valuable wild stocks through cross contamination justifies the development of fish farms in Wales. Cross contamination from farmed salmon has had disastrous effects on wild stocks of salmon. The economy of Wales has more to gain from the sustainable development of its recreational sea fisheries and this area should surely be the main focus of energy and investment.

3.7 Implications of Marine Protected Areas.

Some influential eco-organisations classify angling as an *active* use of the marine environment. This highly subjective classification has tended to mean attempts are made to ban angling, as a matter of course, whenever a marine reserve is proposed, whereas activities deemed *passive* like diving are allowed.

Is angling really more damaging than diving? Many activities can be damaging depending on the way they are practised and the knowledge and experience of the individual practitioner. For example saltwater fly or lure fishing by an experienced angler is likely to involve less contact with flora and fauna on the seabed than diving. If this method is combined with Catch and Release (C&R) or bag limits and directed at migratory species only, the potential for significant damage to the protected features of an MPA would seem limited.

Unfortunately proponents of MPAs are often unaware of the versatility of angling and seek to ban angling, when a total ban on angling isn't necessary

Proposals to create No Take Zones - allegedly for research in a pristine environment - sometimes appear to be little more than a front to provide a zone for the exclusive enjoyment of other recreational activities. How, one wonders, does the provision of a pristine environment fit in with other intensive recreational activities, but excludes sea angling, without robust evidence?

Research suggests separation of recreational activities encourages social division- (Social Identity Theory) in these circumstances separation of users is best avoided unless it can be proven to be absolutely necessary and the reasons for doing so transparent.

If the genuine purpose of the MPA is to create a pristine environment for research, there is surely a very strong argument that all users should be denied access to that environment - not just anglers.

Angling bans also, at times, appear to rest purely on grounds of expediency. "No Take" means "No take", campaigners boast about Lundy Marine Reserve. The argument seems to be that the same protection afforded to animals in nature reserves

on land should be extended to all marine life in marine reserves, irrespective of whether any permanent conservation benefit is derived from this policy. No take exists for the benefit of the species within the site for as long as they remain in the reserve. However, angling is permitted in many nature reserves on land and prohibiting an activity without proof of damage is a highly contentious issue which gives rise to the suspicion that prohibition is really aimed at angling itself rather than any conservation motive. Bans to include angling on grounds of discrimination against fishermen, because angling is after all “fishing” too, seem equally unsatisfactory. The purpose and scale of angling is very different to commercial fishing and it seems unfair to categorise a recreational activity with a production-based use, aimed at supplying many consumers with fish.

There is a great danger that trends to ban angling might proliferate without any real scientific justification. The bottom line should be that angling should only be banned where there is scientific proof that angling has a significant negative impact on the objectives of the MPA. Angling bans based on presumptions of damage should be avoided at all costs. Attempts to include angling in no take policy zones have already led to a spate of Freedom to Fish bills in the United States, one has recently been passed in New York State. These bills seek to protect the right to fish by requiring scientific proof of damage before any angling ban can be implemented.

Regrettably access seems likely to become an increasingly contentious area of fisheries management particularly for RSA. The irony is that anglers have initiated No Take proposals in their own right in the past e.g bass nursery areas to protect juveniles. It would be far better if the agencies worked, with rather than against, anglers in determining the objectives and policy for MPAs .

A report recently prepared for Defra by Professors Sweeting and Polunin, of Newcastle University’s School of Marine Science, suggested that ‘*marine reserve proposals were misguided*’.

The report highlights that many MPA advocates are basing their opinions on scientific evidence garnered from small conservation-oriented MPA’s largely in tropical waters. Although the Newcastle team acknowledges that MPAs have brought many benefits to the tropics and elsewhere, it stresses this experience can not be applied to the North Sea, which possesses very different habitats and species.

Prof Polunin said “*Evidence suggests closing off small areas of the ocean won’t deliver results with regard to highly mobile species like cod and haddock. These fish, which are among the most economically sought-after species, may travel hundreds of miles to move between spawning and feeding areas*”. The same could be said for many other species of sea fish.

If small MPAs offer no real conservation benefit for migratory species is any purpose served in prohibiting controlled angling directed at those species, assuming angling can otherwise meet the objectives for the site?

4. Management issues .

It is our view that a management structure which recognises the RSA value of those species will be needed if the potential value of RSA is to be realised. We do not consider that the present fisheries management regime is sufficiently knowledgeable in the needs of sea anglers to offer much in the way of the direct expertise to deliver on the Governments' Charter for Anglers.

The long-standing dominance of commercial fishing interests on Sea Fisheries Committees (SFCs) has held back the development of RSA in the UK.

4.1 RSA representation.

RSA representation should fully reflect RSA's socio-economic value. A number of recent studies have established that the value of RSA compares favourably with the value of commercial fisheries, although representatives of the commercial sector often dispute valuations of RSA. Fair comparisons are not easy to make, but most recent research fully supports the view that RSA is far more valuable than commercial inshore fin-fish fishing. It is therefore reasonable that RSA should benefit from greater input in inshore fin-fish fisheries, particularly with regard to areas of policy and management of important RSA species.

2. RSA should be wary of committing itself to restrictions without equivalent restrictions on the commercial sector. RSA would be advised to adopt a quid pro quo approach, particularly on the contentious issues bag limits and licensing.

3. Please see advisory committees and species boards – Interstate Fisheries Management at www.asmf.org Do fisheries stakeholders and lay people have sufficient scientific knowledge and the required degree of impartiality to make decisions on complex management issues? Sometimes it seems better to agree the parameters within which a stocks should be managed and allow experts to take the important decisions - as long as it is the well-being of the resource that is the key driver – not exploitation for profit or preservation of livelihoods, at all costs.

Representation on local fisheries management authorities should reflect the socio-economic impact of fisheries sectors i.e. that the paramount consideration should reflect the interest of Wales PLC rather than the interests of a particular group of fisheries stakeholders. Representatives of sport and particularly tourism should be involved in inshore fisheries management in view of the considerable contribution RSA makes to economy of Wales and to ensure the maximum development of its future value .

It is high time the economic contribution of tourism, Wales' biggest industry, was recognised in Fisheries Management circles.

Current levels of representation given to RSA on SFC's fail to adequately reflect the value of RSA to the economy of Wales. In the circumstances representation afforded to RSA on future fisheries management authorities in Wales should at least be equal to, or more than, any representation afforded to commercial fishers, particularly where the management of RSA species is concerned.

4.2 Discards from the commercial Sector

We agree, particularly as many fish stocks are seriously depleted. Methods which involve high levels of discards should be discontinued.

4.3 Management structures

2. In over 100 years, since their formation, SFCs appear to have done very little to improve RSA and have frequently denied any duty to consider RSA interests . SFC enforcement tends to be weak (perhaps due to financial constraints) and finally, and most of all, SFCs are either directly or indirectly dominated by commercial fishing interests.

Will SFC's ever be sufficiently reformed, to fully address the needs of RSA ?

The EA already manages recreational freshwater fisheries including angler licensing, has jurisdiction on migratory species in inshore waters, a strong commitment to enforcement with powers to back it up and has now been given further powers and duties under the WFD.

Is a separate tier of local inshore sea fisheries management really necessary?

Perhaps the management and development of angling (sea and freshwater) would be better coordinated under the EA umbrella. Furthermore, EA management of inshore waters would clear up the grey enforcement area in estuaries, which play such a vital role in sustaining both sea and freshwater stocks.

4.5. Bag Limits

The burden of conservation should be shared.

Many anglers will not be happy with the idea of bag limits unless they are balanced by effective conservation measures to control commercial fishing. Restrictions are also placed on commercial landings where recreational bag limits are applied abroad. We see little point in restricting recreational rod & liners to bag limits, if those using far more efficient methods of capturing fish are free to catch as many fish as they like.

The term *recreational bag limits* should obviously include not only rod and line, but other methods of capture e.g. spear fishing, recreational netting etc.

4.6 Sea angling licences.

Perhaps one of the most contentious issues of all – Many anglers have no objection to a licence providing the fees are earmarked for the improvement of RSA, particularly for enforcement and commercial fishermen also pay for a licence, which would reflect the greater volume of fish captured by commercial fishermen. At the present time, much is made of the fact fishermen have licences, whereas anglers don't, but commercial fishermen were allocated licences free of charge and make no DIRECT contribution towards the environmental and management costs of fishing.

Government seems to have difficulty appreciating why many sea anglers are opposed to a licence. Sea anglers have experienced a rapid decline in the quality of important RSA fish stocks over the last 20 years through no fault of their own. Fish are much smaller and less numerous than they used to be, due mainly to commercial over-fishing.

When anglers ask government to take steps to restore important RSA species, their annoyance isn't so surprising, when a sea angling licence is virtually the first proposal to appear on the table. This attitude might well change, when conservation measures are implemented and more importantly seen to be working.

Sea anglers may find a graduated sea angling licence more acceptable, beginning initially with a nominal sum and increasing, as the conservation measures start to take effect and RSA stocks are restored.

5.2 Integration of angling is more likely to take place more effectively under one authority.

6. Development

6.1 Interactions with fisheries science.

Unfortunately, much of the science has to date focused on commercial, rather than recreational fishing. e.g. the Cefas science backing up the recent proposals to increase the mls for bass focused on maximum commercial yield rather than best value, which some RSA's suggest would be achieved by an even higher mls than 45cms.

The nature of the science applied and which body carries it out becomes a political question. Although much of Cefas' work has focused on commercial fisheries there is theoretically, at least, no reason why Cefas should not also work in the interests of RSA if Cefas is directed to do so. However, if the EA was chosen as the inshore enforcement agency seems probable EA scientists would also have input in the science in time.

2. Information on recreational landings and socio-economic value of RSA should be collected on a regular basis. In the United States, such information has to be gathered and published annually by the National Marine Fisheries Statistics agency under the Sustainable Fisheries Act. www.st.nmfs.gov This information provides important information for planning and development. Given that the potential value of the sea angling experience was estimated at over £1 billion in England & Wales (Drew Study 2004), the cost of collecting and collating this data would seem to be worthwhile.

3. The proposal to carry out more work into the biology of sewin and to look into the potential for sea angling integration linked to this species has some merit.

The growing interest of freshwater game fishers in respect of bass has already been mentioned in 2.2. although there seems to be some territorial resistance to the idea of a special "gamefishing" type licence for certain species of sea fish. The correlation of salt and freshwater angling activities is increasing rapidly and should be reflected at structural level. This is another reason the EA is best placed to manage and enforce inshore fisheries.

6.2 Development of improved/new fishing venues.

Gear restrictions are likely to develop angling venues more effectively than improvements in angling facilities although there is clearly scope for such developments too - launch sites and access to launch sites are increasingly in short supply for small angling boat users.

6.3

1. Again and without detracting from the value of the FWA, conservation measures and the publicising of conservation measures constitute the best form of marketing and promotion.

2. The plans to involve the whole of the angling sector under the FWA umbrella seems an excellent idea. Poor communications due to fragmentation is often angling biggest bugbear. As things currently stand, tackle shops do not even benefit from the membership of a representative body and many only hear about conservation/policy initiatives from their customers. Clearly, there is a dramatic communications failure when retailers hear about developments vital to the future welfare of their businesses from their customers. Again this failure relates back to a one dimensional approach to fisheries policy and management. Were tackle shops in Wales informed about the bass consultation on mls by fisheries managers?

Many angling businesses simply don't appreciate the extent to which their future profits are directly related to fisheries management. This suggest some training and constant updating of information is needed to help angling businesses appreciate the benefits of conservation measures. This can only be achieved if information is available to prove it - hence the importance of collecting the data referred to in Development 6.1 –2

Enclosures –

State of Maryland – striped bass – angler participation correlation.

The Bass Management Plan – Proposals for the revised management of the UK bass fishery. A PDF version available at

www.ukbass.com/bassmanagementplan/bmp/bmpdraft.pdf

Response to the consultation on measures to increase the minimum landing size of bass. A PDF version is available at www.ukbass.com/downloads/bass_wag_resp.pdf

Further information on the Bass Anglers' Sportfishing Society can be found at www.ukbass.com