

BASS Response 2

Dear Mr Derriman

Many thanks for your detailed response, it is much appreciated.
However, you make several points which I must address.

Breeding size - I believe we both wish to use the best scientific evidence available and I am sure you are aware, as Chief Officer of an IFCA, of the hierarchy of "robustness" of scientific evidence.

At the 'top of the tree' are peer reviewed scientific papers published in eminent scientific journals, below that we have evidence authored by highly knowledgeable or well informed experts published by reputable bodies (e.g. the Defra Regulatory Impact Assessment (RIA) of 2006/7 or the Book 'Sea Bass: Biology, exploitation and conservation, written by Pickett and Pawson and considered the definitive work on this subject), below that we have varying degrees of published evidence and at the 'bottom of the tree' we have private, unrecorded verbal statements.

In the Sea Bass book, Pickett and Pawson state "No fully mature females were found at lengths below 42cm, though some showed signs of gonad development up to maturity stage 3 (and one at stage 4)" - page 143.

In the Defra RIA it states that female bass mature at 40cm to 45cm - page 5, it also states that female bass mature at "around 42cm to 45cm" - page 35, it also states female bass first spawn at a size "consistently above 42cm" - page 31 and on page 28 picks a single figure of 42cm.

I believe this body of work represents the best scientific evidence currently available. If you have evidence to support a breeding range contrary to this (eg 38cm to 42cm) I suggest you publish that evidence in order that it can be fully scrutinised in detail, otherwise I believe you should withdraw your statement, acknowledge that female bass reach maturity in accordance with the evidence I have just referred to and unless and until new evidence is produced and accepted that proves the Defra RIA wrong, stick to that best available evidence of the breeding size of bass.

With regard to smaller female bass being full of eggs I would again refer you to the Pickett and Pawson book where this completely natural and normal phenomenon is discussed at length (page 136, 7.4). Basically smaller female bass do develop eggs but they do not develop far enough (as measured by the Gonadosomatic Index) to be spawned, until 42cm +. It takes a trained expert scientist to determine maturity of the eggs and the female bass.

I am not such an expert and I suspect you are not either.

Finally, on the subject of breeding, the 48cm you refer to below is the minimum landing size, applied 12 months of the year, that is needed if you want to be able to make the statement that any bass taken has most likely had the chance to breed at least once. It allows for the fact that a bass caught in say October, November or December, after the main summer 'growing season' will have been smaller at the previous spring spawning season.

Annual growth for a bass of this size is from 3cm to 6cm (dependent on source of information and natural conditions). Given that maturity is at 42cm + you would need an early winter bass to be at

48cm (42 + 6) to be reasonably sure it had had the chance to spawn that spring, hence the requirement for an mls of 48cm. I would be grateful if you could acknowledge your acceptance of this simple concept and arithmetic.

Management Issues - thank you for confirming that you were referring to the French pair trawlers and not small inshore vessels. The impact of the French pair trawlers was covered in the Defra RIA which states "This suggests that the main benefits of an increased MLS would accrue chiefly to fisheries operating within the UK 6-mile zone" - page 15, point 50. Unless you have evidence that the Defra RIA is wrong, which you can publish for full detailed scrutiny, I believe you should acknowledge and accept the findings of the Defra RIA and therefore acknowledge that unilateral UK action will be good for UK fisheries even if our action is not followed by the EU as a whole (which would be most unfortunate, but given what happened over our pair trawling ban, is a possibility).

I am very pleased that the local IFCA's are discussing regional management of bass.

The 500% and 20% were, interestingly, confirmed in the Defra RIA (Annex 2). Given this, I am surprised if there is any doubt about them. I am also surprised that a profit opportunity so large appears to be unwanted by the commercial fishing sector, especially the small inshore boats that are best placed to take advantage of this.

Regarding informal advice from Cefas on bass stocks and bass management, I believe this has now been superseded by formal published advice from ICES (September 2012) recommending a 20% cut in catches to be delivered by technical measures aimed at reducing fishing mortality of juveniles. Could you tell me how you intend implementing this advice?

Regarding your last comment, I am unaware of any previous private conversations you have had with Malcolm Gilbert or others, but I can confirm that BASS is not calling for bass to be a recreational only species. I can also confirm that is the position of the Angling Trust and that that is the position that both BASS and the AT stated to Richard Benyon at our meeting with him last summer.

I am aware that Tony Blair and the Cabinet Office, in their 2004 report entitled "Net Benefits" did call for this to be looked into, but I don't know what, if anything, was actually done in response.

I look forward to your response to the points I raise above, especially regarding breeding size and the impact of French pair trawlers.

Best Regards

Nigel Horsman
BASS Restoration Team