

Bass Fishery Management Plan Consultation Guidance Notes

Introduction:

These guidance notes are to help individual anglers to respond to Defra's consultation on the Bass Fishery Management Plan (FMP) that closes on the 1st October 2023. The consultation may be hard for an individual to respond to and many of the questions assume that respondents will have specialist knowledge.

Maximising the impact of your response:

For almost all the questions, we can write any text we like. If 200 individuals respond, that's 200 lots of individual text that someone would have to look at for each question. Analysis of individual responses will focus on what is easier to analyse. For example, the number of people saying Yes / No, and possibly the number of times a certain word or short phrase is used. This guidance note focuses on the questions where Yes / No answers may be given and suggests some short bullet points to accompany those answers.

Key point: Long paragraphs of text from individual anglers are very unlikely to be looked at.

You can save information and come back to it later. This function is available at the bottom of the page at the bottom of the page. You will be sent a unique link, allowing you to re-open the survey later. If you only have a few minutes spare, you can build up your response by doing this a few times. Each time you re-open the link in your email, the main page will show how many questions you have completed. There are four sections to the consultation.

Section 1 - Personal details - this is mandatory to complete and should be quick / straightforward.

Section 2 – Questions on the Bass FMP - **This is the most important section to complete as an individual angler.** This is where we have the opportunity to get our collective voice heard. Not all of this section needs to be completed for your response to have an impact (see guidance below).

Section 3 – Questions on the Bass FMP environmental report – this section isn't mandatory to complete. It does not contain clear questions and requires specialist knowledge to complete. We do not recommend individual anglers attempt to complete this section without specialist knowledge.

Section 4 – Consultee feedback on the online survey – this is mandatory, but potentially quick / straightforward to complete. You could rate / score the consultation tool, then enter "no further comments" in the text box. Remember this question is about the consultation tool please, so do not add comments on the consultation content / process rather make sure to make your points in Section 2.

Guidance for completing Section 2

This is the section where individual responses are most likely to have the biggest impact.

If we are all aligned in how we respond, there is an opportunity for all recreational anglers to clearly communicate what we do and do not agree with in the proposed Bass FMP.

Consultation / Survey Questions on the Bass FMP

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

Answer Yes, then enter something on the following topics....

- Recreational anglers were initially pleased to be involved in the stakeholder engagement process led by Policy Lab, which appeared to be inclusive, thorough and open, however the draft FMP doesn't seem to reflect the outcome.
- Bias towards commercial fishers - the selection of locations for face-to-face engagement was biased to commercial fishing ports and often excluded recreational anglers who live inland. The survey was extended, commercial fishers were notified, and recreational anglers were not.
- Lack of transparency – many proposals put forward by recreational anglers were omitted from the final selection (e.g. increasing MCRS for bass and strengthening enforcement). These were often backed with sound data and evidence, while proposals to support commercial fishing interests (e.g. continue with maximum sustainable yield) were put forward, with little or no evidence provided on why proposals were included or excluded and even freedom of information requests were denied.
- Further evidenced by the fact that in Annex 2 there are approximately 10 pages (p5 - p15) of analysis for the commercial bass fishery, and two brief paragraphs to cover recreational fishing

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?

- Defra have ignored the biological evidence that spawning stock biomass (SSB) is below safe limits whilst drafting this plan
- The evidence from ICES (International Council for the Exploration of the Sea) is that the SSB is low, fragile and below safe limits, yet Defra suggest a "...significant increase" and uses this as the basis for many Bass FMP Goals
- ICES advise that removals in 2024 should be reduced due to persistent low recruitment
- The 42cm minimum size is set too low to allow sufficient fish to spawn, before they are removed
- There are no effective minimum mesh sizes in place to protect juvenile bass
- Defra has also disregarded the significant body of economic evidence for managing a fishery for recreational objectives
- The draft FMP continues to focus on killing the maximum number of Bass for human consumption, despite there being no evidence to support maximum sustainable yield as the most economically advantageous approach to managing the fishery.

Question 3.

Do you agree that the goals are appropriate for domestic management priorities within the Bass FMP?

Respond “No” to the first part.

Key point: The goals are vague and do not commit Defra to anything that would support a "World class" recreational bass fishery.

By answering ‘No’ it will be hard for Defra to avoid reporting the number and % of responses that agreed/disagreed. Answering “No” should be a clear, quick way to communicate our dissatisfaction with the proposed goals. Then provide some of the following as explanation:

- There is no goal to support the development of "World class" recreational bass fishery, after leaving the European Union / Common Fisheries Policy
- There is no goal to restore the bass stock to a natural age and size profile to support a world class recreational bass fishery.
- Goal 2 “equitable access” contains no actions to support a "World class" recreational bass fishery when previous surveys indicated that bass stocks should be managed with the apportionment of catch allocation between recreational and commercial fishers according to the benefit they generate
- Defra is already ignoring the goal “sustainable harvesting” as the stock is not currently managed within sustainable limits, as evidenced by ICES advice for 2024.
- Defra is already ignoring the goal “Protecting juvenile and spawning bass” by allowing commercial fishers to target spawning aggregations and not adopting temporary closures and minimum mesh sizes.

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

Respond “No” to the first part, for the same reasons as Question 3. Then provide some of the following as explanation:

- The proposed short-term actions prioritise maintaining or expanding a commercial bass fishery (e.g. additional authorisations) focused on killing the maximum number of bass
- The proposed short-term “actions” do not prioritise the restoration of the bass stock to a natural age and size profile to support a "World class" recreational bass fishery
- There are no short-term actions proposed to close netting of bass during November to January and in nursery areas, which is critical to protecting the bass stock from further decline
- There are no short-term actions (e.g. increase minimum mesh size) to reduce by-catch, which is critical to protecting the stock from further decline

Question 5.

Do you agree that the actions are suitable medium-long-term priorities for the Bass FMP?

Respond “No” to the first part, for the same reasons as Question 3. Then provide some of the following as explanation:

Key point: For recreational anglers, we don't agree with the prioritisation:

Many of the proposed actions listed here (e.g. slot sizes, regulation of shore netting, prohibition of fixed netting in nursery areas, fish care / handling guidance), should be re-designated as short-term priorities to protect an already depleted Bass stock

- Medium-long term actions are dominated by those that would be controversial to commercial fishers and beneficial to developing a "World class" recreational bass fishery
- Defra suggest that evidence on goals / measures to support a "World class" recreational bass fishery (e.g. large stock strategy, maximum economic yield) will “evolve”, rather than acting on the evidence that already exists, including its own evidence Annex, which Defra appears to have ignored
- The proposed medium-long term “actions” are somewhat wishy washy, and need to be more specific. (the language uses words like: “consider”, “possible”, “explore benefits of”.) They need to be SMARTer (Specific, Measurable, Achievable, Relevant and Time Bound)
- We are concerned that medium-long term priorities are at risk of not being acted upon by Defra
- Defra and the Welsh Government have not done enough to fulfil their statutory duty to recognise recreational anglers as a key stakeholder when developing these plans

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?

Individual recreational angler's responses to this question are unlikely to be considered in any detail. You could answer “no comment” and move on.

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?

Individual recreational angler's responses to this question are unlikely to be considered in any detail. You could answer “no comment” and move on.

Key point: The term "World class fishery" has been coined by the four UK Governments in their Joint Fishery Statement (JFS) which underpins Fisheries Management Plans. It is therefore correct that we hold fishery managers to achieving this key objective