



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

YES - Our members were initially very optimistic about the stakeholder engagement process, which appeared to be inclusive, thorough and open. As things progressed however, doubts about the impartiality and openness of the process began to develop:

- Many of our members felt that the venues for the lived experience interviews and the co-design workshops being focussed on commercial fishing ports was indicative of "commercial sector bias" e.g. one BASS member who lives in Birmingham was invited to attend a workshop in Plymouth and another who lives in Bristol was invited to the Milford Haven workshop, requiring significant distances and travel time to attend.
- These feelings of bias were solidified when, in an effort to enlist more responses from the commercial fishing sector, Policy Lab extended the co-refine survey by one week and only informed commercial fishing interests; while we were being reassured that the objective of the survey was to obtain qualitative and not quantitative data.
- Via our members' online forum and at our AGM, there were many comments received that our members felt frustrated and "kept in the dark" that the background data underpinning the proposals that Policy Lab had put forward were not made public, despite the time and effort that many had devoted to contributing to various stages of the Policy Lab stakeholder involvement process.
- The proposals that were distilled from the early stages were considered by many to be "business as usual" or "the same game being played out" and "yet another let-down".
- The majority had difficulty in understanding how some proposals had come to the fore e.g. MSY objectives appearing in the workshops and online surveys, when others, which we know have attracted good support within the RSA community (e.g. increasing the bass MCRS and improved enforcement), had been omitted.

## 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?

We find it somewhat incongruous that the Bass FMP presentation to FIAG members and June's webinar presentations claim that there has been a significant increase in SSB (also p4 Proposed FMP for Sea bass in English and Welsh Waters 'Why an FMP for bass'). This sets the underlying premise of the Bass FMP proposals and underplays the urgent need for substantial changes in management objectives, especially when the Bournemouth University report is unequivocal about the state of the bass stocks, containing precautionary statements such as:

***"Bass spawning stock biomass has shown some signs of recovery but remains below the MSY objective."***  
and ***"Despite these measures, bass spawning stock biomass has remained low, resulting in an overall slow rate of stock recovery"*** and ***"However, the interaction of weak recruitment and increasing fishing mortality has resulted in stock biomass declines from 2010, with levels today still depressed - despite the 2015 management measures - due to recruitment success still being relatively weak."***

It is suggestive of a pre-determined agenda that says "keep the commercial sector happy" and more about managing the aspirations of a small minority\* of commercial fishermen, than the much-needed recovery of bass stocks.

***\* " At present, very few vessels are dependent on bass for their primary income. Since 2016, the number of vessels with greater than 60% economic dependence on bass landings has varied between 2-6 vessels."***

Source: p7 of 27 - Annex 10 Goals: evidence and stakeholder views for Bass FMP

Also: **"In entirety, bass made only minor contributions to landings and values of demersal fish captured by UK fishing fleets"**. Source: Bournemouth University report p60.

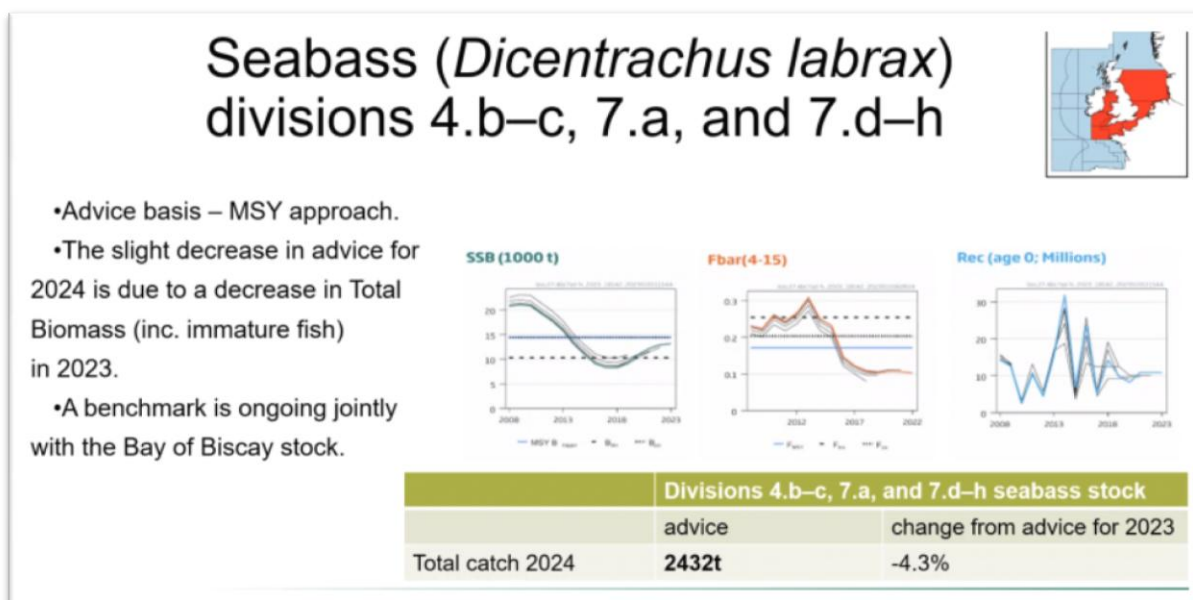
This is despite the much greater participant numbers and magnitude of the financial contribution relating to bass from Recreational Sea Anglers (RSA) and is a classic example of the historic capitulation to the commercial sector and appears as a veiled attempt to avoid "rocking the boat".

Both stakeholder groups are important, and have legitimate needs, which should be taken into account, but the management objectives and emphasis for the Bass FMP should be shifted in favour of RSAs, who generate far more income, across a wider cross-section of society, for far less impact on bass stocks.

In a similar vein, the Bass FMP also claims that bass is currently fished within sustainable limits (p4 'Why an FMP for bass'), yet stocks are below B MSY and at 42cm the MCRS is set too low to allow sufficient fish to spawn more than once (if at all) before being harvested. There are insufficient safeguards (e.g. mandated minimum mesh sizes commensurate with the MCRS), to prevent significant numbers of juveniles being caught and discarded dead, and pre-spawning aggregations are ruthlessly exploited by some unscrupulous commercial fishers - see BASS document: [https://issuu.com/ukbass/docs/targeting\\_of\\_pre-spawning\\_aggregations\\_of\\_bass\\_by\\_](https://issuu.com/ukbass/docs/targeting_of_pre-spawning_aggregations_of_bass_by_)

It would have been more accurate and balanced to say that there had been a slow recovery in the SSB since measures were introduced in 2015, but that the stock is still below safe limits (B MSY) and well below (approx. -50%) of where they were before the crash began in 2010.

ICES advises that total removals for the Celtic Sea and English Channel in 2024 should be reduced (-4.3%) due to a reduction of the Total Stock Biomass, because of fewer immature bass, due to sustained low and fluctuating recruitment. As such, this requires a precautionary approach to bass management, yet there are proposals within the Bass FMP draft to afford greater access to bass to the commercial fishing sector by reducing "latent capacity".



Source: Virtual presentation July 18th 2023 - Latest ICES advice for stocks in the Celtic Sea and English Channel.

Again, a more accurate and balanced statement would have been that bass catches are much reduced since emergency management measures were introduced in 2015, but stocks remain below B MSY and **"recruitment is low, fluctuating without trend since 2008"**.

Source: Latest ICES advice for stocks in the Celtic Sea and English Channel

## General comments

This is a useful first draft, and contains some good proposals to manage the bass fishery. However, in its present form, the FMP is about setting up the infrastructure to manage the bass fishery, and data collection for future actions, but very little to actually deal with pressing issues. As such, it lacks ambition, and represents a missed opportunity to address these and to develop a 'World class' bass fishery that we have been promised.

There are several important measures left out (see later in response), or deferred to the medium-long term which should and could be commenced in the short term. Lots of good intentions, but doubts about whether any of the medium to long term actions will ever be carried out. Not only does the proposed approach undermine the need for change at national level, the FMP will delay much-needed management changes (e.g. to inshore netting) under the current arrangements as IFCA's wait for issues to be considered nationally in the medium-long term (3-6 years).

Returning again to the apparent bias towards the commercial fishing sector - examples such as the Policy Lab comment in Recommendation 4.1: "*However, in the comments it was evident that there are different definitions of 'the benefit' ranging from financial benefits and taxes paid by commercial fishers to the wellbeing benefits of sport seabass angling*" confirm a fundamental lack of understanding of the value of the recreational bass fishing sector to the national balance sheet, where thousands of people work to provide services to anglers, from fishing tackle shops, charter boat operators, bass fishing guides, tackle manufacturers and distributors, boat builders and chandlers and the accommodation and hospitality trades who cater for bass anglers.

These businesses and their employees pay taxes, just like their commercial fishing counterparts, yet their significant contributions and that of the RSA sector to the nation's coffers are dismissively overlooked by this statement.

The RSA related revenue stream to the Treasury was not lost on The Rt Hon Ben Bradshaw (Exeter) Minister of State for DEFRA from 2006 to 2007 who stated during a Parliamentary debate on the bass fishery on 3rd December 2014:

*We know for a fact that recreational bass fishing is worth far more to the economy than commercial fishing and that it is a great deal more sustainable.  
It is also worth noting that the VAT receipts alone from the wealth and activity generated by sea angling dwarfs the income from the commercial sector.*

And within the **Themes** section of the Policy Lab report; comments from commercial fishers / sellers of bass are highlighted in speech boxes 27 times, compared to only 9 comments that are attributed to recreational fishers. This is despite an alleged equal spread of participants from both fishing sectors. This again creates the impression that the views of the commercial sector are prioritised and given more weight than those of the recreational sector.

It is also noted that within Annex 2. Evidence Statement for Bass FMP- there are approximately 10 pages (p5 - p15) devoted to the detailed analysis of the commercial bass fishery ... yet only two brief paragraphs are allocated to cover Recreational Fishing.

Along with many other sea angling clubs The Bass Anglers' Sportfishing Society has kept detailed records of the recreational catches of our members for 50 years and in many respects the records confirm the trends associated with the ICES SSB levels over that time. In recent years the average number of bass >42cm per hour of fishing has been 0.5 with many members reporting trips resulting in no fish above the MCRS being caught for 60% of trips, with bass of >60cms (approx. 5lb / 2.27kg in weight) representing less than 2% of catches (catch Recording Scheme report available). These figures confirm that not only are stocks low (as reported by ICES), but there are very few larger fish left in the UK inshore stock (higher % in S. Ireland), available to those who seek to catch larger specimens.

The current stock profile and exploitation also minimises the number of Big Old Fat Fecund Females (BOFFFs) that an increasing number of scientists assert are important for maximising reproductive capabilities when the optimum environmental conditions allow (see: <https://academic.oup.com/icesjms/article/71/8/2171/748104> )

When commercial fishermen are targeting fish which are aggregating from other areas (e.g. pre-spawning), and chasing down what fish there are with high-tech fish location gear, it's in their interests to play up the stock levels so that restrictions can be lifted or weakened. So, their view does not necessarily reflect the true state of the stock. Anglers, on the other hand, especially shore anglers, have to wait for the fish to come to them, and many shore anglers fish over a longer season, so will get a more representative picture of the stock's state.

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

In general we welcome most of these, with certain qualifications (see below).

However:

- There is no mention of developing a fishery which encourages recreational participation by increasing the numbers and size range of fish, especially larger fish desired by many anglers.
- Current proposals do not adequately consider the needs of recreational sea anglers. Doing so would greatly increase the economic value of the fishery to local economies, while also reducing the impact on stocks.
- There is insufficient attention given to maximising bass recruitment, the effects of the offshore fishery, and preventing localised depletion of stocks through indiscriminate and targeted netting .

#### **Goal 1: Inclusive stakeholder engagement structures to inform management of the bass fishery**

YES.

Probably the most important proposal, if balanced and effective. We firmly believe that commercial and recreational fishers, along with managers and scientists working together, is the way forward and wish to be part of this process.

#### **Goal 2: Equitable access to the bass fishery, while prioritising stock sustainability**

NO.

This talks about delivering "the right balance" between commercial and recreational access to the bass fishery, but the actions which underpin this include nothing about re-apportioning recreational use. This needs to be rectified, especially when in workshops and previous surveys indicated that bass stocks should be managed with the catch allocation apportioned between recreational and commercial fishers according to the benefit they generate.

Section 25 of The Fisheries Act sets out what should be considered when distributing fishing opportunities. Defra's priority is to only address the commercial fishery requirements, however the recreational fisheries are responsible for only 27% of fishing mortality, yet the recreational fishery contributes significantly to coastal economies. Based on the statements within the Annex and Bournemouth University report wrt the low levels of importance of bass to the commercial sector:

***" At present, very few vessels are dependent on bass for their primary income. Since 2016, the number of vessels with greater than 60% economic dependence on bass landings has varied between 2-6 vessels."***

*Source: p7 of 27 - Annex 10 Goals: evidence and stakeholder views for Bass FMP*

Also:

***"In entirety, bass made only minor contributions to landings and values of demersal fish captured by UK fishing fleets".*** *Source: Bournemouth University report p60.*

BASS advocates to prioritise the recreational bass fishery as it offers the most sustainable form of exploitation.

### **Goal 3: Minimise discarding of bass bycatch where survival rates are low**

This talks about minimising discarding, but doesn't consider gear developments for nets and trawls until the medium-long term; we need these (e.g. mesh sizes, length restrictions) NOW.

### **Goal 4: Encourage and facilitate full compliance with bass regulations**

YES.

In principal we welcome this, but worry that IFCA's won't have sufficient information about stock levels to appropriately enforce catch limits. A good intention, but doesn't mention IFCA's being able to access MMO landings data, or increasing staff to carry out inspections and enforcement. They appear not to know how much bass is being caught in their districts, how it is caught and by whom. **Enforcement of the use of the U10 app should assist in this data capture shortfall.** Difficulties in getting byelaws passed suggest that regulations should be made at national level wherever possible. This would also simplify and standardise things.

### **Goal 5: Maximise the benefits of bass fishing for local coastal communities**

YES.

There is an unrealised, latent potential for increased socio-economic benefits for coastal communities within the bass fishery and associated recreational fisheries. If it were not for the depressed condition of the bass stock and the lack of ambition and commitment to restore it to previous size and abundance, Wales and England could have a truly "World Class" bass fishery and attract anglers from around the UK, Europe and further afield. Recreational bass fishing can take place during most months of the year and promoting this nearly year-round activity has the potential to extend the tourist season in coastal communities.

( see: <https://www.eaa-europe.org/news/17564/new-study-confirms-the-economic-significance-of-seabass-angling-in-the-netherlands.html> )

### **Goal 6: Sustainable harvesting of the bass stock in line with scientific advice**

YES ... But we would argue that the stock has NOT been maintained within sustainable limits – it is still below safe limits (B MSY).

The Bass FMP should aim to set commercial catch restrictions which allow the stock to be rebuilt to previous (pre-2010 crash) levels, not B MSY. Alternative strategies should be implemented as soon as possible. We advocate that Maximum Economic Yield and a Large Stock Strategy (More and bigger fish) needs to be the core objectives of the Bass FMP and is detailed in our document ' **Maximum Sustainable Yield - The wrong management objective for bass** see: [https://issuu.com/ukbass/docs/maximum\\_sustainable\\_yield\\_-\\_the\\_wrong\\_management\\_o](https://issuu.com/ukbass/docs/maximum_sustainable_yield_-_the_wrong_management_o)

Managing the UK bass stock to Maximum Economic Yield (MEY) objectives and a Large Stock Strategy (LSS) will bring benefits for commercial fishermen, recreational anglers and coastal communities, and boost the spawning stock to take advantage of favourable recruitment conditions when they occur.

The proposed MSY goal represents a lack of ambition, and fails to realise the potential financial and social benefits the bass fishery could deliver for all fishing sectors and our coastal communities.

### **Goal 7: Protecting juvenile and spawning bass**

YES ... However, short term actions only include a proposal to gather evidence about closed seasons to protect spawning stocks, and do not include the use of temporary closures/restrictions to H&L to protect pre-spawning aggregations.

- There is no specific mention of mandating a minimum mesh size increase to 110 mm in the short (or other) term and no mention of increasing BNAs / EFH, or looking at coastal lagoons and sheltered bays.
- There is a need for increased and more reactive juvenile bass monitoring in more areas through collaborative initiatives with IFCA, universities and citizen science volunteers.

**Goal 8: Minimise the impact of bass fishing on the wider marine ecosystem**

YES.

We welcome retaining current restrictions on trawling and netting, and shift to lower impact gears, but need to do more to reduce the directed netting for bass, with the medium term aim of phasing out the metier completely.

**Goal 9: Mitigate against and adapt to the impact of climate change on bass fishing**

YES.

**Additional goals should include:**

1. Restoring the Spawning Stock Biomass to that seen in the mid-eighties i.e. ~25,000 tonnes.
2. Restoring a natural age/size profile to the stock.
3. Managing the fishery to achieve the greatest socioeconomic benefit and lowest environmental impact.
4. Maximise and protect the extent of nursery habitat.
5. Addressing the impact of the offshore fishery.
6. Preventing localised depletion of stocks.

Although some of these are included under other goals, we feel the importance of them warrants being included as separate goals.

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

Only 2 (potential) management actions are proposed i.e. revising the authorisation system and gathering evidence on the timing and duration of closed seasons to protect spawning bass. There are other short-term actions required (see below). We welcome proposals to improve the evidence base, but this should include selectivity of gill nets and extent of their use?

**Goal 1: Inclusive stakeholder engagement structures to inform management of the bass fishery -**

YES

**Goal 2: Equitable access to the bass fishery, while prioritising stock sustainability**

NO.

Proposals do not include prioritising access for more sustainable fishing methods and tackling abuse of the dual authorisation system. (see Cornwall IFCA Bass FMP response regarding transhipping and dual authorisation abuses)

**Goal 3: Minimise discarding of bass bycatch where survival rates are low**

NO.

This is all about data collection and monitoring, not reducing bycatch. Need to consider gear developments for nets (e.g. mesh sizes / how much net can be set) and trawls as a short-term action. We need a system which prevents repeated fishing in areas when bass catch limits have been reached, as a short-term action.

**Goal 4: Encourage and facilitate full compliance with bass regulations**

NO.

Management needs to be more centralised, so that regulations are UK-wide where possible to overcome difficulties IFCAs face when introducing new byelaws. It should be easier to bring in emergency measures. This would also simplify matters and make communication easier.

There must be a formal data sharing agreement, so that IFCAs have full access to MMO landing data etc. IFCAs must be adequately resourced to carry out surveillance, inspections and prosecutions.

We are concerned that IFCAs won't have sufficient information about stock levels to appropriately allocate local catch limits (or will be pressurised by some stakeholders to inflate). We also have concerns about whether they will be able to reduce limits if stocks fall. There is no mention of flexibility in the other direction i.e. to reduce limits/close fisheries when catches are too high in specific areas, to prevent localised depletion.

**Goal 6: Sustainable harvesting of the bass stock in line with scientific advice**

NO.

We need to move away from the MSY approach and rebuild stocks back up to levels seen prior to the last crash which started in 2010, and we need a more natural age/size profile. There are multiple reasons for this, including benefitting all stakeholders, and enhancing recruitment by ensuring that there are healthy stocks which can take maximum advantage of environmental conditions which are favourable for spawning and settlement when they arise.

**Goal 7: Protecting juvenile and spawning bass**

NO.

Closed seasons (all, or some gears e.g. nets) must include pre-spawning aggregation periods (e.g. Nov- Jan) as well. These closed seasons must be implemented in the short-term - there is ample evidence of very large catches of 'ripe' bass during these pre-spawning periods.

**Goal 8: Minimise the impact of bass fishing on the wider marine ecosystem - YES**

**Goal 9: Mitigate against and adapt to the impact of climate change on bass fishing - YES.**

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

**Goal 1:** YES

**Goal 2:** NO There is no mention of ring-fencing sufficient tonnage, including fish of larger sizes, for RSAs.

**Goal 3:** NO. We need to consider gear developments as a short-term action.

**Goal 4:** YES. With the advancement of knowledge over time, there is now a need for a simpler, more rational and effective approach to managing fishing in estuaries.

- Any 'headroom' created as a result of management measures should first be used to allow stocks to rebuild.
- We would like to see a % catch composition limit brought in in the short term. We suggest a 30% maximum.

**Goal 5:** YES

**Goal 6:** NO. Research into alternative harvest strategies should be accelerated to a short-term action.

**Goal 7:** NO.

- Prohibition of fixed netting in all BNAs must be a short-term action.
- There is no mention of action to prevent localised depletion
- Review of MCRS must be a short-term action to allow emerging year classes (e.g. 2016), which will just be reaching maturity, to breed several times and replenish stocks quicker.
- **We suggest a 48 cm MCRS with commensurate minimum mesh size of 110 mm.**
- There is already sufficient evidence about the high fecundity of large female bass to consider the introduction of a slot size for line-caught bass in the short term.
- Spatio-temporal closures to protect both pre-spawning and spawning bass must be introduced as a short-term action.
- Fish handling guidance to reduce post-release mortality is already available for related species and should be implemented as a short-term action with appropriate education and awareness support.
- Gear modifications (e.g. increasing the upper limit of prohibited net mesh size ranges and limitations on length set) must be introduced (not considered) in the short-term.

Low and fluctuating recruitment is now the main source of concern about bass stocks, yet there is no mention of expanding the number of BNAs, and protecting those we already have from habitat loss (e.g. from climate change and coastal development). This is essential to maximise recruitment. While some potential BNAs may contribute more in this respect, it is thought that all non-polluted estuaries are likely to provide bass nursery habitats. (*Bournemouth University report p 21*).

Research is needed to establish other types of nursery habitats for bass, such as coastal lagoons and sheltered bays. We need increased juvenile bass monitoring in more areas, and an early warning system to allow management measures to respond quickly to the precautionary protection of poor year classes through to SSB recruitment.

Regarding changes to BNA regulations: We would be strongly opposed to a prohibition on targeting bass from the shore, but would support the universal use of barbless/de-barbed hooks to reduce damage to juvenile bass bycatch. BNA regulations should operate year-round.

**Goal 8:** Reviewing inshore and shore-based netting must be a short-term action. There is ample evidence (e.g. Cornwall wildlife Trust Marine Strandings Network reports) of the need to reduce the bycatch of marine mammals and birds. There needs to be an intensive research initiative into the level of bycatch of salmonids in inshore fishing.

**Goal 9:** YES.

## **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?**

- As a group, whose primary aim is to ensure the long term sustainability of our bass stock for future generations, our members will continue to participate in juvenile bass surveys to assess year class strength and provide information for University and Cefas-led research on bass recruitment and involvement in other citizen science projects related to bass biology.
- Our members will continue to collaborate and assist with university-led research to better understand the habitat requirements of juvenile bass and their movements within estuaries and coastal environments. As part of this work we will continue to be assisted in the capture of bass for tagging and provided scale and tissue samples for scientific study and analysis.



- We will continue to support and coordinate bass tagging studies to expand and confirm knowledge of the seasonal migrations of bass.
- As a group, we will continue to offer bursary funding for projects and scientific research into bass biology and ecology involving individuals, groups and students at postgraduate level.
- We would want to offer our accumulated 50 years experience in bass biology, ecology and distribution as working members of any Bass Management Group(s) that should be created as part of the Bass FMP.

**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?**

- There is often close associations of inshore bass fisheries and salmon and sea trout distributions and migrations, salmonids being subject to highly protective legislation. Defra and Welsh Government should consider the links to salmonid fisheries and uphold the UK's commitments to protecting these species.
- Be aware of bycatch of bass within other FMPs e.g. channel demersal, flatfish FMPs:
- Commercial fishers often target these fish (including cuttle) with the hope of achieving high levels of bass bycatch.

**Environmental report response**

**1. Is there any additional evidence we could consider, to inform our environmental baseline?**

For information on how water quality can affect estuaries see:

<https://storymaps.arcgis.com/collections/4d23344ec1044d8da81a79ab90ef7aaf?item=3>

**2. Are there any other positive or negative environmental effects associated with the policies and actions of the draft Bass FMP that we could consider?**

- Salt marsh is an important habitat for juvenile bass. But salt marsh has been lost, for example to land reclamation, drainage and marina development. Salt marshes need to be restored and protected.
- Estuaries are essential habitat for bass, especially juvenile bass. Unfortunately some estuaries are not protected from fixed netting.
- As discussed above, bass migrate along the coastline to and from offshore spawning sites. At these times they are highly vulnerable to inshore fixed netting.
- Near-shore areas are extremely sensitive, yet commercial fixed netters are often allowed to set nets very close to the shore and trawlers allowed to operate in these areas, destroying essential sea grass habitat.

Seagrasses (often found in BNAs) don't receive much attention, but they are one of the most productive ecosystem types on the Earth. They also have an incredible ability that helps fight climate change – a huge capacity for carbon absorption. Seagrasses act as a dense sediment trap, capturing carbon and storing it, eventually depositing it onto the seafloor. *Source: ClientEarth Communications July 2022*

**3. Do you have any comments on the proposed actions set out in the Environmental Report to monitor and/or mitigate any likely significant (negative) effects on the environment of the FMP?**

NO.

**4. Do you have any additional comments in relation to the Environmental Report which you have not been able to provide in response to the previous questions?**

NO.