

Annex 1

Responses For the Consultation on the Increase in Female Crab Minimum Conservation Reference Size

Black text = supporting increase

Red Text = objections

Q1. What is your opinion on the increase of female edible crab from 140mm to 150mm?

1. At the end of the day it can only help the species. Short term losses should make up for long term gain.
2. I support the increase.
3. Personally I catch very few female crabs of market size. I have no objection to a size increase.
4. Ok in the long run
5. I support the increase totally. There is very little demand from buyers for female edible crab of less than 150mm. 140mm crab will increase size to more than 150mm at one moult, i.e. within 12 months. Gives stock more time to breed, therefore helping to maintain stock levels. Creates parity with Cornwall IFCA regs.
6. Good.
7. This doesn't affect me as I have no market for hen crabs.
8. I would support the increase of female crabs from 140mm to 150mm. In exchange could any authority improve the pricing of the fish during the year to the fisherman (more or less same price for past 20 years).
9. I whole heartedly support it, as long as it is for everybody without exception in the D&S IFCA. Long term it will ensure the future of our industry. For the future I would like to see an increase in the male size to 170mm.
10. Firstly, in our opinion 140mm is a very small crab & one year's moult takes it to 150mm so we're not talking about a big problem here. One year's extra breeding can only be good for the industry. Most of our customers already have 150mm as their minimum size anyway. As we have been fishing to a MLS of 150mm for years, it is a non-event to us & we do not intend to revert to 140mm.
11. Processor: A positive move setting an example to others. Allowing the females to moult and reproduce once more before being landed can only strengthen the already healthy stock providing a future for generations to come. In the south of Norway the MLS is 110mm and the landings there are dropping.
12. I do tend to agree with the increase. However I think that an increase of two 5mm increments over two years may have been a better way forward as I suggested during the consultation period.
13. My opinion is once again the inshore fisherman is being hit again with restrictions and so leading to more financial loss. Once again as with the berried lobster laws the smaller boat that fishes closer to shore is being hit.
14. Not needed. Working around the shore in an open 19' Dory between mid-May to mid-September.
15. Response received on 2nd September after consultation deadline): My opinion on the increase from 140mm to 150mm is that there is no evidence to suggest that the increase is needed. If it was backed up by sound evidence from catch figures (over a few years, not a couple of months or so as is the case with this consultation). I would support it wholeheartedly, but no studies suggest this.
What is the point implementing this only inside 6 miles from the shore, when crabs of 140mm can still be caught and landed outside the 6 mile limit? Do you think that the crabs

inside 6 miles are a different stock? REALLY??

Your question states that it's important to provide evidence in support of my opinion.

What a shame then that you didn't provide any evidence to bring this ruling about in the first place. It was brought about by your own admission that a few people that you had talked to in the industry were all for it. Yet again, someone's opinion and yet again no evidence to support their thoughts. Opinions are just that, opinions. They are not facts and therefore do not need evidence of any sort.

Q2. Has the increase in female edible crab affected your business?

1. Only slightly possibly losing between 40 and 50kg per trip.
2. No, because we haven't kept less than 150mm for the last 10 years.
3. No.
4. Awaiting new boat but expect it to have 25-30% impact (less).
5. Definitely not in a negative manner. I would suggest that increasing to 150mm will ultimately benefit fishers only in a positive way.
6. No.
7. N/A
8. Left blank.
9. Yes it will, but from the one year or so of pain there be will gain for us all in the future – 140mm is way too small!!
10. Please see above(Q1 for this respondent).
11. Processor: Yes, as a processor small crabs are much more labour intensive and in a competitive market costs are critical. Larger crabs are easier to process and knowing that the stock is well managed and sustainable gives us confidence to invest for the future.
12. This will have undoubtedly affected our business to some degree but will affect us more during the winter months as we will see a smaller run of crab then.
13. Yes. Even if it was 30kg a day returned at £1.50/Kilo equates to £45 a day at 200 days a year. £9000 a year loss. I think 30kg a day is very conservative estimate for the grounds we fish. As with the bigger boats who fish the deeper offshore grounds and catch bigger crab won't be affected same as with the berried lobster laws.
14. Yes. Returning up to 60%.
15. Response received on 2nd September after consultation deadline): If I am not allowed to keep today what I was yesterday then of course it has affected my business – what a stupid question!! It doesn't just mean I can bring fewer crabs in than before, but the meat yield of smaller crabs is better, especially in the summer months, than the bigger crabs. So whereas numbers landed may be slightly down, the amount of crab meat yielded from them has dropped significantly. When you ask about evidence to support this, it's impossible to do in the short space of time given. Now I can't land 140mm crabs to carry out a comparison asking for evidence is a bit pointless!!

Q3. What percentage of your catch, before sorting, is between 140mm to 149mm?

1. Less than 50%
2. 10% to 15% inshore but offshore only 5% because closer inshore is the breeding ground.
3. The total number of female crab that I land is in single digits per year, four or five animals usually.
4. At times 30-35%.
5. Do not have any accurate figures to answer this question.
6. 50%.
7. N/A

8. Left blank.
9. N/A
10. None, anything below 150mm goes back to the sea alive & we catch it next year at 150mm or above.
11. Processor: Less than 10% of all crabs received at the factory are less than 150mm.
12. % unknown at the mo. Lauren has been out with us for 1 day and will have those figures. Welcome to come again now we are seeing a bit more crab.
13. We had an IFCA officer aboard (Lauren) measuring crab who will have the necessary data.
14. 40-60%.
15. Response received on 2nd September after consultation deadline): During the time span of this after thought of a consultation, my catches of 140mm to 149mm have ranged between 10% and 45% of my total catch. This is a guess between numbers of crabs caught, as a percentage, and total weight, as a percentage – something not made clear in your question, and in light of your rule about not retaining undersize crabs on board, physically impossible to do?? How can I come up with a weight when I can't weigh them at sea and I can't land them. I have had to use figures of numbers of crabs caught, when, to get a true figure they would have to be weighed. I get paid per kilo NOT how many I've caught. Because I can't bring them ashore to prove my figures, it is my word against yours and up to you whether you believe me or not. Yes, we had the chance of yourselves coming to sea on our boat to see for yourselves, and we turned it down. Again, one or two trips to sea is not enough to gain a realistic view, especially if they had been days where we only put 10% of our catch back. Again you would only have been able to count the number of crabs at sea as oppose to weighing them. Do you not realised that a small, full crab will weigh more and produce more meat than a larger, emptier crab? That is why when someone buys some live crab from a fisherman, he will weigh them and pay per kilo, not so much per crab (a point which you don't seem to be taking into consideration).

Q4. Have you got any alternative management measures that you think should apply to the edible crab fishery?

1. To stop more effort any proposed quota system should be based on track record over a period of years as opposed to put limitation the objective to be to increase the value of this premium product.
2. The only one perhaps is no landing of cripple in the summer (IV mid channel) we return the cripple to sea (because they are half price).
3. Don't know much about crab – mainly lobsters here. You would be welcome to come on a trip but they tend to be arranged at the last minute (weather and uncertainty if I get enough people to run a passenger trip instead). Possibly not much help with crab survey but nice scenery though!
4. All English Channel to have same size. Stop using crab for whelk bait. Officer welcome aboard.
5. Left blank.
6. No.
7. N/A
8. Improve the prices of shellfish to fishermen.
9. It should be a European measure not just inside 6 mile and that should be for berried lobsters as well.
10. No, the edible crab & spider crab fisheries are in great shape in south Devon our problems are on the commercial side. We have views about the lobsters, but you're not asking about that!

11. Processor: Not alternative – additional. Increasing the MLS is by far the quickest way to help the stock and the easiest to police. Other measures such as pot limits and restricted permits will help maintain the profitability of the existing fishermen.
12. I would like to see more policing of part-time boats e.g. checking gear, no of pots, have they got permits etc. There are more pots than ever in the bay between Salcombe & Prawle Point this year mainly non-members of the association. Being understaffed, in my opinion, is not a good enough excuse. If rules are made they must apply to all and be properly managed.
13. The size increase could be good for the industry BUT once again the very much inshore boats will pay the price whilst the offshore boats as with the berried lobster are relatively unaffected, and even increase their effort for them (lobster days). Further discussions are required.
14. Left blank.
15. Response received on 2nd September after consultation deadline: Yes – don't change anything unless you have evidence to support it. If it ain't broke, don't fix it. If there was a problem in the fishery of catches going down, average sizes going down etc. then fishermen would be only too glad to get it sorted, it's our future after all, but there has been no evidence provided by yourselves that there is a problem in the edible crab fishery within 6 miles. You have provided no sound evidence which you have to according to MMO guidelines published online, instead rushing through a (far too short to be any good) consultation with questions pretty much impossible to answer.