



Secondary Consultation on Potential Net Management Measures for Estuaries, Harbours and Piers

Summary of Responses

March 2020

Title: Secondary Consultation on Potential Net Management Measures for Estuaries, Harbours and Piers

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About this document: This document has been developed to summarise the secondary consultation undertaken by Southern IFCA between 6th January and 29th December 2020 to seek the community's on proposed net management measures for the Southern IFCA district. Engagement and consultation was aimed towards representative organisations of those stakeholder groups that were set to be the most affected by the proposed measures. The responses received by the Authority have been summarised in this document. In determining the most suitable next steps, Members of the Authority will have access to the full package of responses received, together with any accompanying evidence.

Further Copies:

This document is available in electronic format from the Southern IFCA website at www.southern-ifca.gov.uk

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1. Introduction

Background

The harbour and estuarine waters of Dorset, Hampshire and the Isle of Wight are highly biodiverse and ecologically rich habitats, providing valuable nursery and refuge areas for a variety of fish species. These transitional waters also form an important migratory route for salmon and sea trout as they leave and re-enter our riverine environments.

Our harbours, estuaries and piers are also important places for people, offering a place to enjoy through recreation or somewhere to make an income. In particular, these areas hold great significance for recreational and commercial fisheries.

Net fishing is an activity which has been carried out by fishers in the estuaries, harbours and coastal waters of Dorset, Hampshire and the Isle of Wight for generations. Net types and fishing methods have evolved over time to reflect the target species, local environment, technological advances and the people using them. At the same time, the impacts of developing fishing methods on the marine environment and fish populations have changed. It is important to take the opportunity to consider how these activities can be better managed to better support these habitats, species and human users, promoting positive economic and social benefits for coastal communities.

Current Management

Within the Southern IFCA District there exists a complex range of management measures relating to the use of nets in harbours and estuaries.

These measures include Southern IFCA byelaws such as the Fixed Engines byelaw, the Sea Fisheries Fixed Engine Prohibitions Byelaw and the Regulation of the Use of Stake or Stop Nets in Langstone Harbour legacy Byelaw, national legislation including Bass Nursery Areas, local regulations such as Harbour Master byelaws or land-owner permissions and voluntary codes such as the Southern IFCA Netting Code of Practice.

European Union measures outline required mesh sizes and the marking of fishing nets at sea. Specifically, within 6nm, regulations require that nets are labelled in a prescribed manner and it is recommended that marker buoys are used and marked with the vessel's port letter and numbers (PLN) so that gear is easily identifiable.

Recreational fishers, or fishers from the shore, are currently allowed to fish with nets within the district, providing that they follow relevant net regulations.

IFCA Duties

The nationally agreed vision of the IFCAs is that they will:

“lead, champion and manage a sustainable marine environment and inshore fisheries within their Districts by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry”

Under Section 153 of the Marine and Coastal Access Act 2009, Southern IFCA must manage the exploitation of sea fisheries resources in the district. In doing so, the Authority must:

- a) *seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way,*

- b) *seek to balance the social and economic benefits of exploiting sea fisheries resources of the district with the need to protect the marine environment from, or to promote its recovery from, the effects of such exploitation,*
- c) *take any other steps which in the authority's opinion are necessary or expedient for the purpose of making a contribution to the achievement of sustainable development, and*
- d) *seek to balance the different needs of persons engaged in exploitation of sea fisheries resources in the district.*

Furthermore, the Authority has responsibilities to manage fishing activities within sites of conservation importance such as Special Areas of Conservation (SAC), or Sites of Special Scientific Interest (SSSI). This is of particular relevance to this review as, within the district, the Atlantic salmon (*Salmo salar*) is listed as a species of Community Interest in two SACs and both the Atlantic salmon and the brown/sea trout (*Salmo trutta*) are referenced in the citations of several SSSIs. Additionally, the Atlantic salmon was identified as a priority species under the UK Biodiversity Action Plan (BAP) and subsequently listed as a Species of Principal Importance under the Natural Environment and Rural Communities Act 2006.

Under Section 155 of the Marine and Coastal Access Act 2009, the Authority has the power to make byelaws for the district. IFCA byelaw guidance outlines the management options and the scope of IFCA byelaws.

2. The Review

The Authority identified, through a strategic review of management measures, that it was a priority to review the management of near-shore netting & nursery areas in the district. Following consideration by the Authority, Members identified a set of objectives to review and, if necessary, develop netting regulations to:

- i. Support the use of estuaries and harbours by bass and other fish populations as nursery and refuge areas;**
- ii. Provide protection to migratory fish species as they transit through our estuaries and harbours; and, within these areas**
- iii. Balance the social and economic benefits and different needs of users in exploiting the fishery**

An Authority Working Group, consisting of Defra Appointee Members, conducted this review in an evidence based, strategic and proportionate manner.

In line with the objectives of this review, Members considered the effectiveness of existing management and opportunities to strengthen it. The best available evidence from a variety of sources, including the Environment Agency, Natural England, commercial and recreational users has supported decision making throughout this review.

2.1 Pre-Consultation

Through this review the Working Group drafted a series of proposals on which the views of the community were sought through a period of pre-consultation. This first round of informal consultation sought the community's views on proposals for the management of net fishing activities in estuaries, harbours and piers in Dorset, Hampshire and the Isle of Wight. This pre-consultation closed on 7th December 2018, having run for a period of 8 weeks.

A Public Consultation document outlined the scope of the review including the objectives, proposals and associated rationale as well as providing information on how people could

participate. A Supporting Evidence document was also produced to accompany the Public Consultation Document.

The Authority held a series of six drop-in style meetings across the district to provide stakeholders with the opportunity to learn more about the proposed measures and to provide views. In addition, officers met with representative groups, attended meetings and presented to forums.

■ Responses to Pre-Consultation

Overall, a high level of evidenced responses were submitted during the first round of pre-consultation, with 242 written responses received and further verbal engagement with 27 other individuals. Responses were largely dominated by three roughly defined sectors: those individuals with a commercial fishing interest (more often than not actively engaged in commercial netting), those individuals with a recreational sea angling interest and those individuals with a river angling interest (including riparian owners, anglers and guides). Generally speaking, it was clear from responses received that 199 respondents (including 88 template responses) did not believe that the proposed net management measures were restrictive enough. Conversely, 27 respondents (almost all of whom had a commercial fishing interest) felt that the proposed measures were too restrictive. The responses received have been summarised in a Summary of Responses document.

■ Review of Evidence

Following the submission of considerable new evidence, Members of the Authority's Working Group committed to undertake a review of their existing proposals. There was a strong response to the pre-consultation to highlight the value of our harbours and estuaries to salmonid populations and the support that these populations also provide to resident fish populations in our chalkstream rivers. Respondents to the pre-consultation also recognised the value of harbour and estuarine areas as essential fish habitat, particularly for the socially and economically valuable species grey mullet, bass and flounder.

A good proportion of respondents stated that the proposed net management measures were not restrictive enough to achieve the necessary protection for migratory salmonids as they move through our waters; the underlying rationale being the impact of both intentional and unavoidable interactions with nets used in our estuaries, harbours and coastal areas. These respondents argued that salmonid bycatch in nearly any form of net was unavoidable and, on this basis, net use should not be allowed in harbours and salmonid migration routes where migrating salmonids are often more concentrated. Many believed that the Authority should seek to be more precautionary in their approach due to the designations protecting these species and the UK's involvement in the North Atlantic Salmon Conservation Organisation. It was also highlighted that there may be unavoidable consequences of displacement of effort into other harbour net fisheries if these were allowed to continue.

Conversely, some respondents questioned the level of evidence available to demonstrate negative interactions between harbour and estuarine nets and migratory salmonid species, particularly in the Southern IFCA district. In particular, respondents focussed on the uncertainty surrounding netting impacts in Southampton Water (Dock Head to Calshot) and Poole Harbour in particular. Ring net fishing for grey mullet and fixed netting for flatfish and herring were highlighted in Poole Harbour, whilst in Southampton Water respondents highlighted the demersal fixed net fishery for sole in relatively shallow waters.

Additional harbour and estuarine net prohibition areas were proposed for Weymouth Harbour, where there is evidence of sea trout movement from/to the River Wey, the wider area of Langstone Harbour and the remaining parts of Portsmouth Harbour, particularly in light of recent evidence of salmon presence in the River Wallington.

At their meeting on 8th March 2019, Working Group Members agreed that revisions to the proposed measures should only be made where clear evidence of a need for change had emerged from the first round of pre-consultation.

There was a general acknowledgement that, although management consistency is desirable, there are significant differences in geomorphology and fishery pressures between sites and so it may be beneficial to consider a site-by-site approach, maintaining the ability to be flexible in the application of management, possibly by way of a permitting approach.

Members focussed on the proposed management of net use in Poole Harbour to help them develop principles to apply when considering management of other harbour and estuarine areas for the protection of salmonids. The following principles were agreed:

- A prohibition of all net use should be considered under the precautionary principle in estuarine pinch-points and assumed principal salmonid migratory channels to reduce the likelihood of net interactions.
- Where applicable there should be alignment with existing local netting regulations.
- Proposals should have due regard for sites where salmon are a designated feature/sub-feature or supporting feature.
- Seasonal restrictions on fixed/drift net use should be considered for all other harbour areas during periods of peak salmonid migration.

At their meeting on 15th April 2019 Members of the Working Group considered how these principles could be applied to other harbour and estuarine areas in the district and whether potential changes were necessary for the defining principles for ring net use in harbour and estuarine areas.

The Working Group met again on the 28th May 2019 and confirmed revisions to their net management proposals for all harbours and estuaries, in line with the principles outlined at their previous meeting. It was also determined that the MCRS for grey mullet should be increased from 30cm to 36cm for Golden grey mullet and 42cm for Thin and Thick-lipped mullet (overall length), with a final increase when the fish size byelaw is reviewed. The agreed proposals would be presented as management recommendations to the Authority's Technical Advisory Committee.

Following the Working Group's recommendation, at their meeting on 7th November 2019, the Authority's Technical Advisory Committee agreed to draft two new byelaws, a Net Fishing Byelaw, to introduce new net fishing measures in the district, and a Minimum Conservation Reference Size Byelaw to introduce increased minimum size restrictions for grey mullet species in the district. It was also agreed that the Authority should seek the views of the most affected users through a second round of pre-consultation, targeted towards representative groups.

Draft Byelaw Proposals

The Authority's draft management proposals were outlined in a standalone document for consultees. It was proposed that the following management measures would be introduced through the Southern IFCA Minimum Conservation Reference Size Byelaw:

- An increase in the minimum conservation reference size for thick-lipped grey mullet and thin-lipped grey mullet from 30cm to 42cm overall length;
- An increase in the minimum conservation reference size for golden grey mullet from 30cm to 36cm overall length; and,
- An increase in the minimum conservation reference size for crawfish from 95mm to 110mm carapace length.

It was proposed that the following management measures would be introduced through the Southern IFCA Net Fishing Byelaw:

- A prohibition of all net use within 100 metres of Southsea Pier, Sandown Pier, Ryde Pier, Yarmouth Pier, Boscombe Pier, Bournemouth Pier, Swanage Pier, Weymouth Nothe Pier and Weymouth Peninsula Pier;
- A prohibition of all net use within Bridge Lake (Langstone Harbour), Fareham Creek (Portsmouth Harbour), the Rivers Meon, Hamble, Test and Itchen, Bembridge Harbour, Wooton Creek, King's Quay (Isle of Wight), the River Medina, Newtown Harbour, the River Beaulieu, Yarmouth Harbour and the Western Yar, the River Beaulieu, Lymington River, Keyhaven, the Rivers Stour, Avon and eastern parts of Christchurch Harbour, the Rivers Frome and Piddle, Lytchett Bay (Poole Harbour), Wych Lake and Middlebere Lake (Poole Harbour), Weymouth Harbour, Bridport Harbour, the Langstone Channel and Broom Channel in Langstone Harbour, the Main Channel, Portchester Lake, Fountain Lake and Paulsgrove Lake in Portsmouth Harbour, the Main Channel and Hamble Channel in Southampton Water, the Main Channel in Christchurch Harbour and the Wareham Channel, Main Channel and South Deep in Poole Harbour;
- A prohibition of the use of net within 3 metres of the surface of the water within 1nm of the coast in Lyme Bay, between the western boundary of the district and a point east of Burton Mere;
- A prohibition of net use within the Christchurch 'Box' area at the entrance to Christchurch Harbour between 15th February and 30th September inclusive, each year;
- A prohibition of all net use except bottom nets within the Christchurch 'Box' area between 1st October and 14th February inclusive, each year;
- A prohibition of all net use without a valid Harbour and Estuarine Net Permit within Langstone Harbour, Portsmouth Harbour, Southampton Water, Christchurch Harbour, Poole Harbour and the Fleet, provided all conditions of the permit are being met;
- When net fishing in a Harbour and Estuary Net Permit Area, the mandatory marking of any net at each end by a labelled marker buoy that is above the water at all states of the tide;
- A prohibition of the use of a net to fish for or take from the harbour and estuarine net permit areas any bass (*Dicentrarchus labrax*) or of the use of a net whilst this species is on board the vessel; and,
- The issue of Harbour and Estuarine Net Permits to a person, in respect of a named relevant fishing vessel.

The Authority may limit the number of permits that it grants in accordance with a review procedure outlined in the byelaw. It is not the intention of the Authority to initially limit the number of permits issued.

The Authority may, in accordance with a review procedure outlined in the byelaw attach, vary or remove flexible permit conditions to a harbour and estuarine net permit relating to the following matters:

- a) The method, frequency and deadline for the reporting of information to the Authority relating to any interaction between a net and an Atlantic salmon or a sea trout within a harbour and estuarine net permit area;
- b) the amount of sea fisheries resources a permit holder or vessel may take by use of a net within a harbour and estuarine net permit area during the year, or part of the year; and
- c) the prohibition or restriction of any method of net use within a harbour and estuarine net permit area during the year, or part of the year.

Management proposals under the flexible Harbour and Estuarine Net Permit at the point of making the byelaw were:

- A prohibition of the use of any net, other than a ring net within Langstone Harbour, Portsmouth Harbour or Poole Harbour between 1st March and 31st October, each year;
- A requirement for permit holders to, within one week, report any interaction between their fishing activity and an Atlantic salmon (*Salmo salar*) or a sea trout (*Salmo trutta*) when fishing with a net within a Harbour and Estuarine Net Permit Area;
- A prohibition of the use of any net, other than a ring net or a bottom set net within Southampton Water; and,
- A prohibition of the use of any net, other than a ring net within The Fleet, Christchurch Harbour and the Wareham Approaches in Poole Harbour.

It was proposed that the cost of a harbour and estuarine net permit, valid for a fixed five-year period, will be £120.

It was anticipated that the measures that will introduced as flexible permit conditions may be subject to periodic change in response to the evolving availability of relevant evidence, such as the sustainability of fish populations, the health of the marine environment, impacts of net fishing activities and fisheries data available to fisheries managers.

3. Secondary Consultation

In January 2020 representative groups of the potentially most affected and engaged users, as identified through the review to date, were contacted with information about the revised management proposals and were invited to speak with officers in further detail about the proposals and the rationale behind their design. As well as informal communication with officers, consultees were invited to submit a response to the consultation in writing by the end of February 2020.

At the same time, all respondents to the first period of pre-consultation were written to with an update on developments in 2019.

3.1 Summary of Engagement

Between 17th January 2020 and 29th February 2020 representative groups of the potentially most affected and engaged community members were contacted by the Authority with information about the revised management proposals. These groups include fishing associations falling within or overlapping harbour and estuarine areas, the National Federation of Fishermen's Organisations, South Coast Fisherman's Council, the Angling Trust, National Mullet Club, Wild Trout Trust, Salmon and Trout Conservation, the region's Recreational Angling Sector Group, the Dorset, Hampshire and Isle of Wight Marine Conservation Group, Environment Agency and Natural England.

Following initial contact, Officers attended a total of 12 meetings to outline the management proposals and the rationale behind their design. Following these meetings, a total of 8 written responses were received by the Authority.

Sector	Meetings	Responses
Commercial Fishing	5	3
Recreational Fishing	3	2
Environmental	2	2
Statutory Bodies	2	1
TOTAL	12	8

Table 1: Summary of engagement, by sector.

Summary of Responses

This summary provides an overall flavour of the information received; Members will be able view the full responses and accompanying evidence when determining the most appropriate course of action. In places, this summary makes reference to costs and benefits, however financial data have not been included on the basis of confidentiality and representativity.

3.2.1 Southampton Water

With reference in particular to the existing grey mullet net fishery in Southampton Water, some respondents highlighted the divergence between the existing surface drift netting fishing technique used by some fishers and the proposed definition of 'ring-net'. Some fishers currently operate a 350metre surface net, not necessarily set in a complete ring, to almost exclusively fish for grey mullet and would be unable to continue to do so if the proposed restrictions were introduced.

Within the Rivers Test, Itchen and Hamble there are defined areas which are important to net fishers due to their historic value as grey mullet catch areas, and represent a high proportion of their actual fishing area. These are very shallow areas, outside of channels and areas of high flow and are considered by fishers as extremely low risk for salmonid bycatch. Local fishers have presented a case for maintaining access to these defined areas, potentially through a restricted permit scheme whereby a limited number of existing fishers are granted access. If these areas are lost it has been suggested that at least one fisher will be forced to sell their boat and give up fishing.

Respondents also highlighted the value of the area between the proposed northern boundary closure (from Hythe Pier to Weston Shore) and the existing northern boundary closure (East/West through Dock Head) and questioned the need and rationale for moving this boundary line. In fact, one respondent went further to suggest that there was currently no clear evidence to suggest that Dock Head should be considered a 'pinch-point' at all.

There was a concern by one respondent that the financial figures stated in the draft impact assessment to quantify the value of the fishery within the proposed net prohibition areas was inaccurate by a factor of at least 10. Limited additional evidence was provided to substantiate this response.

3.2.2 The Solent

Along the New Forest shoreline, it has been highlighted by some respondents that the saltmarsh channel systems provide valuable grey mullet fishing whilst presenting, in their view, little risk to migratory salmonids. These saltmarsh channels are most prominent around the entrance to the Lymington River and at Pennington and Keyhaven. Fishers have therefore presented a case to continue net fishing within these areas.

There was a suggestion that, as Langstone Harbour is functionally linked to Chichester Harbour, a standard approach to net management across both harbours should be applied and Langstone should therefore be closed to all net use in a similar manner to the proposals made by Sussex IFCA for Chichester Harbour.

3.2.3 Christchurch Harbour

Some respondents highlighted Christchurch Harbour as an area where they felt the proposed measures were not restrictive enough, referencing evidence of 80% interaction between salmonids and nets from a report submitted by the EA. Due to this evidence it was suggested that Christchurch Harbour should be given more consideration as a net prohibition area.

It was also highlighted that the River Mude has a salmonid run but has not been afforded the protection that other salmonid rivers have in the proposed measures, with a suggestion that net fishing should be prohibited within a set radius of the river entrance. A respondent also questioned the value of the grey mullet fishery within Christchurch and highlighted the low number of participants, suggesting that a greater value could be achieved from increased recreational angling opportunities if the grey mullet net fishery was closed completely in this location.

3.2.4 Poole Harbour

Within Poole Harbour some respondents specifically identify the channel fringes as important fishing areas, particularly at slack water. These areas naturally attract high concentrations of fish as the channel begins to slope upwards and, when fished, the aim is not to interact with the deep-water areas of the channel. Should the existing proposals stand there is the risk of unintentional non-compliance due to the activity taking place so close to the prohibited areas. This was particularly relevant in the area between Brownsea Castle and the entrance to Poole Harbour.

Additional evidence from the SAMARCH Interreg project was submitted which highlights the proportionately high percentage of sea trout and Atlantic salmon smolts that are apparently 'lost' within the Poole Harbour estuary system during their downstream migration compared to three other estuaries studied under the project. It must be noted that the geomorphology of

Poole Harbour is distinctly different to these three other estuaries, with a wider network of shallow channel systems, potentially exposing fish to a greater range of predators. The respondent suggests that ring netting in Poole Harbour may be the primary cause for this discrepancy and proceeds to highlight the risk posed to smolts (which may measure up to 20cm in length) by monofilament nets.

Also, additional evidence was submitted by one respondent to highlight that sea trout populations comprise of repeat spawners and, in Poole Harbour, post spawning sea trout return to sea from December to the end of February. The respondent concludes that the timing of the proposed measures would therefore place these fish at risk from winter fixed net use as they move through the harbour.

3.2.5 The Fleet

One response suggested that, due to the low economic value of fisheries within the Fleet, the Fleet should be considered a net prohibition area as the benefits to bass and grey mullet populations and the consequential increase in recreational angling would far outweigh the costs to a 'handful' of local commercial net fishers.

3.2.6 Migratory salmonids

Some respondents highlighted, what they believed to be, the greater negative impacts of other issues such as licensed water abstraction, effluent discharges, predation and climate change on local migratory salmonid populations and questioned why greater steps weren't being taken to address these issues first. Respondents also dwelt on the issue of licensed targeted fishing of salmonids in rivers and questioned the impact of this activity. There are several rivers in the district where sea trout anglers are permitted to retain their catch and the impact on sea trout populations from this activity was clear. Respondents also questioned the impacts of catch and release angling practices within migratory salmonid fisheries, highlighting the evidence of mortality within this practice and suggesting that the impacts from freshwater salmonid angling fisheries in the district are far greater than existing net fishing practices, for which they highlight the lack of evidence for negative impact through incidental bycatch, referencing the 2019 observer trips carried out by Southern IFCA. Although this issue is considered by the draft HRAs 'in-combination' with mitigative measures for net fishing, it was felt that they did not receive enough scrutiny by the relevant authorities, notably the EA and NE.

Some respondents questioned the validity of the data used to determine the relative survivability of salmonids after capture in ring nets. In one case, additional data gathered as part of the SAMARCH project demonstrated that fish caught in fixed gill nets set on an overnight lay were almost certainly likely to be found dead with significant scale damage as a result of the interaction.

In reference to the interaction between salmonids and fishing nets and the relative survivability, it has been suggested that a greater emphasis should be placed on the information provided by the net operators themselves, of which there is currently very little reference in Southern IFCA's documentation.

3.2.7 Grey Mullet

Some respondents present evidence which, they believe, indicates a decline in the grey mullet population in the district. Based on this evidence it is suggested that the proposed measures are not restrictive enough to support a sustainable population of grey mullet in the district. It is their belief that the proposed measures will actually be counter-productive and will encourage

greater fishing effort within the grey mullet fishery. As a solution, it is suggested that grey mullet fishing effort restriction measures and greater restrictions on net fishing in harbours and estuaries are required, referencing the closures implemented by Devon and Severn IFCA, Cornwall IFCA and the proposed closure of Chichester Harbour (functionally linked with Langstone Harbour) by Sussex IFCA.

Also requested is a more restrictive MCRS for all grey mullet, above the proposed 42cm. It is suggested that it is near impossible to accurately differentiate between golden grey mullet and the two other species without dissecting the fish and therefore a separate size for golden grey mullet would be ineffective and unenforceable. The respondent references “the only peer-approved research to define the L50 (the length at which 50% of fish have spawned at least once) for female thick-lipped mullet in UK” by Hickling in 1970, where a size of 47cm was found, suggesting that this should be the MCRS that the Authority adopts.

Grey mullet is defined by several respondents as a ‘low-value’ species and it is concluded that they have the potential to contribute more to the community through recreational angling fisheries rather than commercial net fisheries. Conversely, other respondents highlighted the value of commercial grey mullet fishing to local fishing communities, particularly to very small vessels and new entrants, due to the low set-up costs and relative availability of the resource.

3.2.8 Bass

Several respondents have identified the divergence between the existing seasonal bass nursery area (BNA) closures in some estuaries and the proposed measures to prevent the fishing for or carriage of bass throughout the year in all estuaries. Some view these proposed measures as being too restrictive and unnecessary, suggesting that there is the potential for major financial impact to the fishing industry without just cause. The EU emergency bass measures are referenced by some respondents as being an effective tool to drive recovery in bass stocks and are believed by these stakeholders to be sufficient to support a sustainable bass fishery in the district.

It has been suggested that, should the proposed restriction be employed in the new measures, then it should only be applied within those harbours where there is an existing BNA and only during the periods for which the BNA measures currently apply. In many cases, bass is a bycatch species of a mixed winter net fishery and the proposed measures will only result in the unnecessary discard of potentially dead fish.

3.2.9 Co-management

The Authority was thanked by many for taking the opportunity to actively engage stakeholder through this review process.

Active bycatch monitoring appears to be widely accepted by respondents, particularly those with a commercial fishing interest and further recommendations were made about how this could be practically achieved, although more than one respondent questioned the rationale behind the selection of the 5 salmon threshold.

Some respondents positively identified the benefits of a collaborative approach to net fishing management, referencing the potential benefits of improved compliance and reporting of illegal activities, particularly by those with access to the fishery. It was suggested that further steps could be taken to improve codes of practice and negate the burden of legislation.

4. Next Steps

This summary of responses document will be shared by email with all individuals who responded to the pre-consultation. The document will also be posted on the Authority's website and will be shared by social-media.

Authority Members will consider this document, together with all responses received from this consultation ahead of the development of net management byelaws for the district.

Should the Authority choose to make a byelaw it will be advertised in local publications and on the Authority website. The byelaw will then be subjected to a 28-day statutory consultation, during which the community will have the opportunity to formally respond. The Authority will in turn reply to each of these responses before deciding whether to seek Secretary of State confirmation. The byelaw will only become active once it has been confirmed by the Secretary of State.