



'Call for information': a review of the Southern IFCA inshore pot fisheries

Summary of responses

January 2019

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1 Introduction and Objectives

Fishing with pots for shellfish, such as whelks, cuttlefish, crabs and lobsters in inshore waters is of great economic and social importance and has been carried out for generations across the coastal communities of Hampshire, Dorset and the Isle of Wight.

In order to support coastal communities and the future sustainability of the inshore pot fisheries, the Southern Inshore Fisheries and Conservation Authority (IFCA) is currently undertaking a review of the existing management arrangements within the district. We are at the beginning of this process and have held this 'Call for Information' to take account of your views from the outset.

The information received during this process will be used to consider what, if any, further measures may be taken to support the inshore pot fisheries in the future. If a need for further measures are identified, the Authority will conduct an informal pre-consultation in 2019.

1.1 Existing Management Measures

The following provides an overview of the current management measures in place which govern the fisheries in questions.

1.1.1 European Legislation

Under Annex XII of Council Regulation (EC) No. 850/98^[1] a number of shellfishes are subject to a minimum conservation reference size (MCRS). MCRS is designed to protect juveniles of each species. Details of this are provided in Annex A of this document. In addition, under paragraph (18,4b) of the above-named regulation, when using pots or creels a maximum of 1% weight of the total catch of edible crabs landed may consist of detached claws.

1.1.2 National Legislation

There is Statutory Guidance on the catching or landing of berried lobsters and crawfish in England^[2]. This guidance prohibits the fishing for (in English waters) and landing of (into English ports) berried lobsters and crawfish. In addition, The Lobsters and Crawfish (Prohibition of Fishing and Landing) Order 2000, prohibits the landing and retention of any lobster or crawfish with a 'V' notch in the tail or which is mutilated to obscure a 'V' notch.

1.1.3 Southern IFCA Byelaws

Under the 'Protection of Berried (egg bearing) Lobsters' Byelaw^[3], the removal of berried lobsters is prohibited in the Southern IFCA district.

1.1.4 Voluntary Measures

Southern IFCA Cuttlefish Traps Code of Practice^[4] was developed to provide protection to cuttlefish eggs.

1.2 A Call for Information

A 'Call for Information' is an evidence gathering exercise, which is undertaken with stakeholders, which seeks to obtain information regarding the fishery in question. The information received during this process can then be used to inform the Authority of whether there is a need to undertake a further review of the fishery, with specific regard to its sustainability. As such, the feedback provided by stakeholders during this 'Call for Information' may be used in order to provide a structure for a later pre-consultation with stakeholders.

Between April and June 2018, Southern IFCA undertook a 'Call for information', which invited views from stakeholders regarding (1) whether there is a need to review the existing management arrangements governing the pot fisheries throughout the district, (2) to identify any improvements that could be made to

^[1] <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1998R0850:20060117:EN:PDF>

^[2] <https://www.gov.uk/government/publications/catching-or-landing-of-berried-lobsters-and-crawfish-in-england/catching-or-landing-of-berried-lobsters-and-crawfish-in-england>

^[3] <http://www.southern-ifca.gov.uk/byelaws#Protection-of-Berried-Lobsters>

^[4] <https://secure.toolkitfiles.co.uk/clients/25364/sitedata/files/Cuttlefishtrapcodeofpracti.pdf>

support the sustainability of the pot fisheries and (3) to provide suggestions on how improvements could be achieved.

In total, two hundred and fifty-three fishermen who held a current Southern IFCA permit and indicated that they participate in pot fisheries within the district, seven merchants and four fishing associations were contacted in writing by Southern IFCA, asking for their views. The following questions were posed to all:

1: Do you currently fish with pots in the Southern IFCA district? If yes, please specify the area fished, your method and target species.

2: What are your views on the current inshore pot fisheries in your local area?

3: What improvements would you like to see in the fishery? If any?

4. How do you think these improvements could be achieved?

5. Do you have anything else you would like to say?

In addition to the dissemination of these questions, fifteen stakeholder engagement meetings were conducted by Southern IFCA Officers and the 'Call for Information' was also advertised on a range of social media platforms and via the Southern IFCA website.

1.3 Responses

A total of forty responses were received. Of these thirty-three were from commercial fishermen, one was from the fish processing and retail sector and six were from Fishermen's Associations. Annex B contains a breakdown of responses received by sector.

For note, the summary of responses reflects both the feedback received in response to the specific questions highlighted for comment during the 'Call for Information', as well as an account of the less structured written and verbal responses received during stakeholder engagement. A detailed transcript of responses received can be found in Annex C.

2 Summary of responses

The feedback provided by respondents to the 'Call for information' have been split into the following areas:

- Southern IFCA district crab and lobster fisheries;
- Southern IFCA district whelk fishery;
- Southern IFCA district cuttlefish fishery;
- Southern IFCA district recreational and part-time pot fisheries

2.1 The Lobster and Crab Fishery

2.1.1 Management intervention

Thirty-three respondents expressed an opinion on the need for management intervention in the crab and lobster fisheries in the district. Of these, seventeen would support the introduction of new management measures. Three respondents suggested the need to introduce a permit scheme; access to which could be restricted to those vessels with a track record and a district homeport. One fisher suggested that a permit scheme could have the facility to 'cap' the fishery in response to declining stocks.

Twelve felt that the current stock levels were sustainable, with five of these providing a rationale based upon the volume of immature lobsters seen on the grounds. Six respondents felt that the crab and lobster fisheries were self-regulating, providing a rationale which gave regard to the current size of vessels engaged in the fisheries, the availability of grounds for harvesting and the tidal and weather restrictions which limit days at sea. For note, five fishers attributed this year's poor stocks to inclement weather.

Two commercial fishermen called for a review of the current MMO Statutory Guidance on the catching or landing of berried lobsters and crawfish in England, whilst one openly supports this guidance.

2.1.2 Pot limitations

A total of twenty respondents provided feedback regarding crab and lobster effort limitations. Of these seven were in favour of the potential to introduce pot limitations, with suggestions including pot limits of between 250 and 400 pots. Five respondents suggested the pot limits should be directly related to the number of crew a vessel has. One respondent suggested that the pot limits should reflect the current levels of pot numbers in operation in the fisheries. One commercial fisher suggested the need for a 'pot register' instead of pot limitations or tagging. Conversely another fisher felt that the marking of pots could be a useful tool for management of the fisheries. One fisher thought that there should be an assessment of current pot numbers, before considering any management intervention.

Eleven (11/20) respondents did not feel there is a need to introduce pot limits in the fisheries. Of these, three provided a rationale that pot limits are hard to enforce, and three believed that the introduction of a pot limit would have a negative impact on their livelihood. In addition, one respondent raised concerns that an introduction of pot limits may provide larger vessels with an advantage over smaller vessels.

2.1.3 Escape hatches

Four (of seven) respondents suggested they support the use of escape hatches in pots. Of these one suggested that the hatches should be integrated into the pots during manufacture.

Equally, three respondents indicated they were opposed to escape hatches, with two suggesting that larger crabs can block the escape hatches. One respondent felt that if pots were checked regularly then escape hatches were not necessary, whilst another felt that the inclusion of escape hatches would allow pots to be checked less regularly. One respondent was opposed to any form of change to the pots.

One fisher felt that escape hatches should be introduced to all pots unless fishers were targeting velvet crabs.

Two further responses from Fishermen's Associations reported mixed feedback with regard to escape hatches; with some fishers using the presence of small crabs and lobsters in the pots as an indication of future stock levels, whilst others recognise that pot clearing is easier with escape hatches installed. Some fishers see little benefit with escape hatches, apart from the fact that they get rid of fiddler crabs and prevent ghost fishing.

2.1.4 Minimum and maximum conservation references size

Thirteen responses made reference to the current landing size of either lobster or crab, of these; four were not in favour of any change to the minimum landing size for either species. Of these, one opposed change to the lobster landing size because of the recent implementation of the MMO's Statutory Guidance on berried lobsters.

Four fishers would support an increase in the lobster landing size, suggesting an incremental increase. Two fishers suggested a 120 mm maximum landing size for female lobsters. One fisher suggested a 1 mm per year increase up to a threshold of 90 mm. The rationale underpinning this suggestion was that currently the lobster fishery is at its maximum potential, with few larger lobsters seen.

Three fishers suggested a need to increase the minimum landing size for brown crab by 10 mm.

2.2 The Whelk Fishery

2.2.1 Management intervention

Ninety four percent of respondents (17/18) would support a management intervention in the whelk fishery. Of these, four indicated a decline in catches; four raised concerns with regard to the larger boats and their use of up to 800 pots, three noted the abundance of undersize whelks, with one fisher's catch composition, prior to sorting, regularly in excess of 60% undersize. One fisher highlighted a significant reduction in the amount of whelk eggs seen. Two fishers suggested that a quota system could be introduced.

2.2.2 Pot limitations

Eighty percent of respondents [12/15] suggested a need to introduce pot limits in the district's whelk fisheries. Of these seven fishers suggested pot limit ranges from 300 to 600 pots per boat. Two of these indicated that pot limits should factor in crew. One fisher thinks that vessels in excess of 8m should be subject to limits. One fisher would like to see separate limits for different zones, e.g. 0-3nm and 3-6nm.

Those respondents (3/15) who would not support the introduction of pot limits believe that pot limits are hard to enforce and would be concerned about IFCA lifting pots at sea to check them whilst undertaking compliance patrols.

2.2.3 Escape holes

Fifty five percent (5/9) of respondents thought that whelk pots should have escape holes, with suggestions that escape hole sizes could range from 22 mm and 25 mm. One respondent indicated that they would like to see escape holes incorporated into the pots during manufacture. One commercial fisher suggested the use of a pot neck mesh size which could be used to filter undersize whelks.

Of those who would not support the introduction of escape holes, one provided a rationale that the larger whelks would block the holes, with one concerned that the holes would cause the pots to buckle upon hauling.

2.2.4 Riddles

Eight respondents (8/10) would support the introduction of a riddle minimum size. Suggestions of widths ranged from 22 mm to 25 mm. One fisher discussed the need for the riddle size to reflect the fact that whelks can be fat or thin.

2.2.5 Temporal closures

The majority (8/9) of fishers who provided feedback, are in favour of a closed season. Of these, four suggested the need to align this with the whelk-breeding season; one suggested a closure between 1st July to 31st October, one from the end of May until the end of December and another during October and December.

Two respondents suggested the introduction of a temporary closure, with one suggesting a period of one to two years and the other suggesting a period of one year.

2.2.6 Species minimum and maximum conservation reference size

Three of eight respondents would support an increase in the whelk minimum landing size. Of these, one fisher would like to see research undertaken which looks at the relationship between whelk height and width

at sexual maturity. One fisher would like the minimum size of whelks to be based on the width of the organism, rather than length.

Of those who did not believe that there needs to be an increase in the minimum landing size, one thought that given the current composition of the whelks (large numbers of small), an increase in the MLS would make the fishery unviable.

2.3 The Cuttlefish Fishery

2.3.1 Management intervention

Nine respondents commented on the cuttlefish fishery. Six fishers raised concerns regarding the impact of the offshore cuttlefish trawl fishery, with three of these specifying the trawl fishery is taking small individuals which have not had the opportunity to breed. One noted that the cuttlefish pot fishery has decreased due to the impacts of the cuttlefish trawl fishery and another described the trawl fishery as unsustainable. One fisherman association also expressed concern about the current effort levels of the cuttlefish trawl fishery. A further individual expressed that they were concerned about the cuttlefish fishery but did not clarify whether it was the trawl or pot fishery they were referring to.

One respondent would like to see the cuttlefish pot fishery managed via a quota system.

2.3.2 Voluntary Measures

Three respondents support the measures listed under the Southern IFCA Cuttlefish Traps Code of Conduct. One Fisherman's Association also supports this code.

One fisher has concerns with regard to cuttlefish eggs being jet washed off the traps and would like to see traps left at sea until September in order to allow for the development of the eggs, in particular this practice would be supported in the Solent where there is greater natural protection from storms.

One fisher did not agree with the measures under the code which suggest that traps should remain at sea for specific durations, due to the value of the traps.

2.3.3 Pot Limitations

Three out of five respondents would support the introduction of cuttlefish pot limits, with the following suggestions provided: 150, 200 and 300 pots per boat.

The remaining two respondents (2/5) of respondents would not support the implementation of cuttlefish pot limits as they believe that cuttlefish need regional management and pot limits are not effective.

2.3.4 Temporal and spatial closures

Two fishers would like to see either a temporary or fixed closed period in the cuttlefish fishery. One of these fishers would like to see a complete landing ban on cuttlefish over an unspecified period whilst the other would like to see the cuttlefish fishery closed during their breeding season. Neither specified whether they were referring to the pot or trawl fishery or both.

2.3.5 Species minimum and maximum conservation reference size

Two individuals suggested that cuttlefish needs a minimum legal size to limit the trawls which are taking small animals.

2.4 The recreational and part-time pot fishery

Fifteen (out of the total of forty responses) expressed concern about the recreational pot fishery. Six of these believed the recreational fishery should be managed through a pot limitation. Two of these six suggested a pot limit; one suggesting 25 of each pot type and one 5 pots in total.

Three of the fifteen responses suggested recreational potting should be managed by catch limits with two of these explaining that catch limits would be preferred because pot limits are hard to enforce. Of these, two gave suggestions; one of five per day and the other of one crab and one lobster per day.

Six of the fifteen would like to see more policing/enforcement/monitoring of the recreational pot fisheries. One specified this should focus on landings, with specific reference to minimum sizes. Another indicated they

wanted the IFCA to act on tip-offs when notified and a further individual requested that enforcement should be highly visible to ensure recreational potters are complying with all appropriate legislations.

Five (out of the fifteen) are concerned about the sales of catch not being declared by recreational fishers.

3 Next Steps

This document will be presented to the Southern Inshore Fisheries and Conservation Authority on 13th December 2019. At this meeting the following recommendations will be made:

1. For the summary of responses to be disseminated to industry and advertised on social media platforms.
2. For the Authority to consider the need for a Byelaw Working Group to consider the responses and the duties of the IFCA under the MaCAA.

For any further information on the progress of this workstream please contact:

enquiries@southern-ifca.gov.uk

4 Reference List

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¹

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²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722904/Cefas_Crab_Stock_Assessment_2017.pdf

Annex A: Shellfish minimum conservation reference sizes

Under Annex XII of Council Regulation (EC) No. 850/98^[1] a number of shellfishes are subject to a minimum conservation reference size. These are displayed in the following table (1).

Table 1: European Minimum Conservation Reference Size (MCRS) for the species targeted in the Southern IFCA pot fisheries.

Species	Female MCRS (mm)	Male MCRS (mm)
Edible Crab	140	140
Spider Crab	120 (whole)	130 (whole)
Velvet Crab	65	65
Lobster	87 (whole)	87 (whole)
Whelk	45	45
Cuttlefish	No MCRS specified	No MCRS specified

Annex B: Reponses by sector

Table 2: Breakdown of responses by sector

			Total
Individual Commercial and Recreational Fishers	Written	22	33
	Face to face engagement	11	
Merchants, fish processing and retail	Written	1	1
	Face to face engagement	0	
Fishing Associations	Written	2	6
	Face to face engagement	4	
Total*			40

* Total figure reflects number of individual responses – where both written and verbal responses were received only one response was counted

^[1] <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1998R0850:20060117:EN:PDF>

Annex C: Summary of responses

Table 3: Responses relating to the 'Call for information'

The call for information	
Overall opinion	
The ' Call for Information' on the District Potting Fishery	<p>The majority of respondents who responded to the call for information (34/40) were in some way in favour of additional management for the pot fisheries in order to provide the security of long-term fishery sustainability. Of the forty, thirty-three were commercial fisherman, one was a representative from the fish processing and retail sector, and six were representatives of fisheries associations.</p> <p>Of those stakeholders (6/40) who stated they were not in support of any further management for the pot fisheries, the following reasons were provided; two fishers were concerned that further restriction would deter youngsters from joining the fishery, one is happy with the current situation, another believes any declines are due to system and ground changes, one feels fishing is sustainable with plenty of berried and juvenile lobsters on the ground and one is concerned that more management could affect their livelihood.</p>

Table 4: responses relating to the Southern IFCA lobster and crab fishery

The lobster and crab fishery	
Points raised	
The state of the lobster and crab fishery	<p>Twelve respondents describe the lobster and crab fishery as sustainable, good or steady. One of these relates the positive status of the fishery to the low number of active fishing vessels.</p> <p>Three suggest there are lots of small lobsters on the ground. Two others suggest there are lots of juvenile lobsters and crabs and plenty of berried hens. A Fisherman's Association notes an increase in the numbers of small individuals and berried undersized individuals over the last few years.</p> <p>Five believe the fishery is poor or low this year due to the cold winter and ecosystem and ground changes. One notes that spider crab is in abundance. One response think stocks can be improved.</p> <p>There was an almost equal split between those 33 respondents that commented on whether additional management was needed in the fishery (17 support some type of management, 16 were against all management). One fisher believes the fishery is currently at its maximum potential. Two suggest the fishing effort is large with a high density of pots in certain areas.</p> <p>Six believe the fishery is self-regulating with reasons behind this including the high gear costs, the availability of ground and weather or exposure limiting effort over the fishing grounds.</p>
Effort limitations	<p>Eleven respondents out of the twenty who expressed an opinion do not support the introduction of pot limitations for this fishery. Three fishers said pot limits are hard to enforce whilst one response suggested pot limits are easy to disobey. Three fishers said pot limits would finish or negatively affect their income and livelihood. Other reasons for not supporting pot limits included:</p> <ul style="list-style-type: none"> • The fishing climate has changed, fishers have lost (mackerel, whitefish, berried lobsters and bass) so need more gear than ever. • Pot limits would have no effect on part-time fishermen. • Changes to pot numbers may cause bigger boats to have an advantage unless a pot restriction was fair. • Pot limits are not wanted for smaller boats. This respondent asked questions about what would happen to surplus pots: would there be a payment for

pots/boats and would the surplus pots be bought or swapped? Therefore, there may not be an actual reduction in pot numbers. Pot limits could push smaller boats outside 6nm which is a health and safety concern.

- If a pot limit is introduced, the limit should reflect current fishing effort levels to keep status quo.
- Not supportive of pot limits in my area.
- Management should be area specific: the one size fits all approach does not work.
- The fishery is self-regulated by vessels and tidal access. Fishers need a certain amount of pots to have a viable income. If implemented pot limits should be based on vessel length.
- Pot limits would not be effective. But if they are implemented the limit needs to be a high number, so suggests a max of 600 per vessel.

Seven responses were in favour of a pot limit for this fishery. One was neutral about pot limits for the fishery and said the size of the area limits the fishery. This respondent recommended if pot limits were needed 200-300 pots could be the limit but crew should be factored in. Those who support pot limits recommended the following:

- 300 per boat, 400 if more than one crew.
- 300 for vessels under 8m between 0-3 nm. Then reduce the limit in time.
- No more than 10 strings of pots per vessel.
- 250 per boat, plus extra for crew.
- Pot limits should be based on vessel size and crew number.

One fisher raised concerns about how pot limits would affect owners with two boats but only one set of gear. Another indicated that they need a certain amount of gear to make a profit.

- One respondent suggested a pot register should be introduced because of the drawbacks of pot tags and limits.
- One respondent does not support pot tags as it leads to those with more than one vessel increasing their quantity of gear.
- One response supports pot tagging.
- One response does not agree with the pot limit spatial limitation used in Sussex.
- One indicated that we should assess what pot numbers are already being used before introducing limits.

Thirteen responses commented on the legal size of either lobster or crab.

Four did not support changes in size for both lobster and crab. An additional respondent was opposed to changes in the size of lobster because of the berried hen landings ban which is already in force. Another reason given for not supporting an increase in legal size was that smaller hard crabs are more common in winter when other species are not and two responses said that inshore lobster are smaller.

Two support the proposal that there should be a maximum legal size for lobster with one suggestion of 1.5kg/120mm.

Four support an increase in the lobster legal size with the following recommendations:

- A little at a time
- 1mm per year up to 90mm
- 90mm

One gave a reason explaining that the fishery is currently at maximum potential because there are no larger lobsters.

Three of these four individuals recommended an increase in minimum legal size for brown crab:

- 10mm increase

Legal sizes

	<ul style="list-style-type: none"> • 10mm increase • increase to 150/160mm.
<p>Escape hatches</p>	<p>Four of the seven responses who commented support the use of escape hatches in lobster and crab pots. One suggested escape hatches should be included in pots at the manufacture stage and another response proposed that they should be used unless fishers can prove they are landing velvet crabs. Another felt that having escape hatches fitted to pots allowed gear to be checked less regularly.</p> <p>Three comments indicated they are opposed to escape hatches. Three reasons given were: because they get chewed up by bigger crabs, because they jam up with bigger crabs and one fisher believes he checks his pots regularly enough that they are not needed.</p> <p>Two fishermen's associations reported mixed feedback about escape hatches. Fishers like to see the small as an indication of future stock but the pot clearing is easier with them installed. Some fishers think they are useless but others say they get rid of fiddler crabs and they prevent ghost fishing.</p> <p>One response is against any changes to pots.</p>
<p>Other management measures and comments</p>	<p>Other management measures proposed by the responses are detailed below:</p> <ul style="list-style-type: none"> • One fisher does not want to have to provide catch returns as this simply doubles up work for them. • Three responses supported the idea of a permit scheme, with one suggestion that they are only given to vessels with a district home port and historical track record. This response also indicated that permits may need to be capped to avoid over exploitation. • One response from a fisherman's association expressed concerns over permits. • One suggested gear should be marked. • One simply requested some type of 'stock management'. • One proposed that mutilated crab landings should be banned. • One believes that large boats should be focused outside of 6nm. • One believes fishing licences should only to be given to those whose home port is in the area fished. • One supports the use of AIS. • Two are against a closed season due to changes in weather which can change the dynamics of the fishery. • One suggests artificial reefs would encourage and improve species as a protected habitat. Over the last 40 years the areas fished have been hit hard by beam trawlers. • Two respondents are against the berried hen lobster landings ban with one saying the ban leads to less lobsters to be available in winter which drives up prices however, the price drops when they shed their eggs and become available again. • One fisher supports the berried hen landings ban. • One fisher indicates that crab fishing is best between August and December and is normally focus over 5 weeks.

Table 5: Responses relating to the Southern IFCA whelk fishery

The whelk fishery	
Points raised	
The state of the whelk fishery	<p>Out of the 18 who commented on whelk management 17 believed more management is required whilst one does not think any further management is required. They described the fishery in the following ways:</p> <ul style="list-style-type: none"> • One described the fishery as overfished and on the verge of collapse. Some boats are doing 700 pots per day. • One had concerns over fishery displacement, whelk fishery pot numbers and management. • One said something needs to be done for the future of the fishery. • Another described that catches have declined and there are now hardly any eggs. They believe whelking effort has increased over the last 15 years with larger boats now working 600-800 pots mostly inshore up to 3nm. Up to 60% of the catch is immature. • One feels the whelk fishery improved this year potentially due to better compliance with riddle size. • One describes that whelk fishing is poor with many undersized. • Another says whelk effort dropped from 3 to 4 boats to 1 to 2 in their area. • One suggests whelk is in poor condition due to high fishing effort, the year-round fishery and no restrictions. • One thinks there are potential issues with whelks due to large boats. • One noted seeing lots of small whelks, and recently hauled one string with only 4 sizeable whelks. • Whelk needs management with one or two measures at a time. • Whelk landings have reduced and are now very poor.
Effort limitations	<p>Twelve of those fifteen who commented are supportive of pot limitations as a management measure for the whelk fishery. They gave the following suggestions:</p> <ul style="list-style-type: none"> • 300 pots per vessel • 400 pots per vessel • 500 to 600 pots per vessel • 600 pots per vessel with a staged implementation and should be based on number of crew • 600 pots per vessel • Boats larger than 8m 600 pots per vessel. No limit for smaller boats. • A pot limit in the 0-3nm zone and 3-6 nm zone. • 300 pots per vessel and factor is crew. <p>Three of the fifteen were against pot limits and gave the following reasons:</p> <ul style="list-style-type: none"> • Pot limits are hard to enforce and easy to disobey • Pot limits are not effective • Cannot police pot limits and the fisher would be concerned about IFCA lifting and damaging pots. Pot limits could push people outside 6nm (Except those who don't have capacity which will be unfair) but could positively limit visiting vessels. If required pot limits should be based on vessel length. <p>One response supports pot tagging.</p>
Temporary closures and closed seasons	<p>Eight responses out of nine who expressed an opinion supported a closed season in the whelk fishery. Those who made specific comments suggested:</p> <ul style="list-style-type: none"> • Closed season between 1 July to 31 October. • Closed season between end of May to end of December. • Closed season is needed because the ground needs to rest for a few months. • Closed season between October and December (breeding season). • Open season for 3 months when whelks are not breeding.

	<ul style="list-style-type: none"> • A three to five-month fishing season during summer when whelks aren't breeding. • Closed season over the whelk breeding season (supported by science) or closed season based on when landings are low. The fishery is not currently getting a rest due to a strong year-round whelk market. <p>One respondent out of the nine was against a closed season and asked if a closed season would work – do whelks have a venerable time?</p> <p>Two respondents suggested the whelk fishery needs a temporary closure with one suggesting a period of one to two years and the other suggesting a period of one year.</p> <p>No responses gave the opinion they were against a temporary closure of whelks.</p>
<p>Legal size</p>	<p>Three responses suggested the whelk minimum size should increase. Two of these three gave the following comments:</p> <ul style="list-style-type: none"> • For an increase we need to know whelk height/width at sexual maturity. This should be informed by the science of whelk size at breeding maturity. • As the UK is leaving the EU, the minimum size should change to width not length because whelks are sorted in a riddle by whelk width. <p>Five other response opposed an increase in whelk minimum size. Only three gave comments:</p> <ul style="list-style-type: none"> • Do whelks mature at a size? • Minimum size is not effective management. • Currently there are lots of small whelks so an increase will make the fishery unviable.
<p>Escape holes</p>	<p>Five responses indicated they felt whelk pots should have escape holes. These responses added the following suggestions:</p> <ul style="list-style-type: none"> • Someone should consult with the manufacturer to design escape holes into new pots. • Escape hole size of 22mm. • Escape hole size of 25mm. • The mesh size on pot neck can also be used as escape holes. <p>Four other responses indicated they were not supportive of having escape holes in their whelk pots. Only two reasons were given:</p> <ul style="list-style-type: none"> • Holes become blocked by larger individuals when hauling. • Pots would buckle with bigger escape holes.
<p>Other management measures and comments</p>	<p>Eight responses supported the idea that the whelk fishery could be managed by a whelk riddle size. Suggestions of the following were given:</p> <ul style="list-style-type: none"> • 22mm riddle size. • 25mm riddle size. • Riddle size should be informed by science of whelk width/length. • Whelks can be fat or thin depending on the area. Could increase riddle size to an equivalent of an increase in minimum size to get over this issue. • 23 mm riddle size. • Currently use a riddle 23 1/4 mm <p>One respondent was indifferent about riddle size management and currently uses a 22-23mm riddle. Another who did not show an opinion either way suggested if whelk MLS or riddle size is introduced it should be phased.</p> <ul style="list-style-type: none"> • Two respondents suggested a quota for the whelk fishery. • Two responses supported the creation of a permit scheme however, one of these worried it could put young fishers off and indicated that permits will need to be able to be transferred to different boats.

- One response commented that nationally there is an assumption that big whelks are caught inshore but this may not be true.
- Another pointed out that the east coast whelk fishery was restricted 3 years ago and is now recovering. They believed that some boats are working 1200 whelk pots at the moment.
- One response proposed that a whelk closed season and MLS increase could work together but not a whelk closed season and pot limitation together.

Table 6: Responses relating to the Southern IFCA cuttlefish fishery

The cuttlefish fishery	
Points raised	
The state of the cuttlefish fishery	<p>Nine responses commented on the cuttlefish fishery. One of which was a Fisherman's Association.</p> <p>Seven of the nine are concerned about the cuttlefish trawl fishery including the Fisherman's Association. Of these seven three respondents are concerned about the trawl fishery taking small individuals which have not had the opportunity to breed. Other comments given about the trawl fishery included:</p> <ul style="list-style-type: none"> • Cuttlefish have decreased and this is believed to be due to trawlers which cause potters a loss of income. • Cuttlefish needs regional management which needs to address the trawl fishery. • The cuttlefish fishery is poor. The trawl cuttlefish fishery is not sustainable - in 2014 there was limited trawling due to bad weather and cuttlefish pot catches were good. • Concerned over the cuttlefish trawl fishery. <p>A further respondent was specifically concerned about the cuttlefish pot fishery, whilst the final respondent who commented did not make it clear which cuttlefish fishery they were concerned about.</p>
Effort limitations	<p>Three respondents out of the five who commented supported pot limits within the cuttlefish fishery. One of these believes that cuttlefish traps work too efficiently and ghost fish when they have been lost in the sea. Three gave suggestions:</p> <ul style="list-style-type: none"> • 150 pots per boat and pots need to be spaced further apart. • 200 pots per boat. • 300 pots per boat. <p>Two were not supportive of pot limits in the cuttlefish fishery giving the reasons that cuttlefish need regional management, pot limits are not effective and that the cuttlefish fishery effort is focused elsewhere.</p>
Temporary closures and closed seasons	<p>One individual suggested that cuttlefish need a total ban. Another suggested that cuttlefish needs a closed season during their breeding season.</p>
Legal size	<p>Two individuals suggested that cuttlefish needs a minimum legal size, both of which specifically suggests this would be to limit the trawls which are taking juvenile animals.</p>
Other management measures and comments	<p>Three responses are supportive of the cuttlefish traps code of practise. Another response from a fisherman's association also supports this code of practise. One of these is concerned about cuttlefish eggs being jet washed off and thinks traps should be kept in the sea until September particularly in the Solent where there is greater protection from storms.</p> <p>One other response said they do not support the cuttlefish code because pots are too valuable.</p> <p>One individual proposed that cuttlefish pot fishery could be managed via a quota system.</p> <p>One response asked has landings data from the trawl fishery been analysed and suggested that research is being carried out on the maturity of cuttlefish.</p>

Table 7: Responses relating to the Southern IFCA recreational and part-time pot fishery

The recreational and part-time pot fishery	
Points raised	
Management of the recreational fishery	<p>Fifteen responses showed concern about the recreational pot fishery. Six of these believed they should be managed via a pot limitation, with two suggestions of pot limits, one stating 25 of each pot type and one 5 pots in total.</p> <p>Three of the fifteen responses suggested recreational potting should be managed by catch limits: with two of these giving suggestions of 5 per day and 1 crab and 1 lobster per day. Two of these said this is because pot limits are hard to enforce.</p> <p>Six of the fifteen wish there to be more policing/enforcement/monitoring of the recreational pot fisheries. One specified this should focus on their landings and sizes. One said this should focus on acting on tip-offs when notified. Another said enforcement should be high visibility to deter potters.</p> <p>Five of these fifteen are concerned about the sales of catch by recreational fishers. Comments on this were as follows:</p> <ul style="list-style-type: none"> • Individuals are fishing 50 pots and selling their catch but not declaring this. • Part-time fishermen without licences are selling their catch for cash. • Those on benefits fish to the maximum income and then sell their catch for cash to avoid benefit deductions. • Back door sales undermine commercial markets. • Fishers are concerned about the illegal sales in this sector. <p>Other management measures suggested for this sector were:</p> <ul style="list-style-type: none"> • One respondent suggested registration/licensing, pot tagging and catch returns. • Another suggested a recreational closed season. • One suggested that there should be a campaign to raise awareness of the regulations for recreational potters. • Another proposed gear marking and a permit scheme. • One wished for a complete ban on recreational and unlicensed pots and nets. <p>Other comments about the recreational fishery are given below:</p> <ul style="list-style-type: none"> • Recreational potters are a concern due to numbers taken from fishery and the flouting of size limits. • Authorities are not capturing this sector.
Part-time fisheries	<p>The below comments were made about part-time fishers:</p> <ul style="list-style-type: none"> • There are a lot of part-timers whose sole income is not from fishing. • SIFCA should regulate part-time registered users with larger boats having to work outside 6nm. • Part-time fishers work hundreds of pots (lobster, whelk, cuttlefish and nets). They have another income. • There are issues with part-time/ hobby potters who leave their gear ghost fishing. • There is a part-timer with at least 60 pots who tells me he is just topping up he pension. He has a wooden gauge 10mm thick that cannot work.

Table 8: Responses relating to other variables and miscellaneous

Other variables and miscellaneous	
Points raised	
<ul style="list-style-type: none"> • The IFCA should encourage fishers to earn living rather than introduce further restrictions. • Fishermen should be entitled to an opinion. • Engagement needs to be face to face. • A hatchery of all shellfish and molluscs would be good, set up with Southampton University and released in to the Solent. • My licence been capped and with no bass entitlement, so further restrictions would severely harm my business and living. Plus, there is an MCZ on my fishing grounds which will impact me harshly. 	

- There is no need to change the fishery, fishers' licences have been capped, plus the bass ban so we have no other means to earn a living.
 - Concerned about the amount of restrictions making it difficult for the future of the industry and harder to make a living. Has the berried lobster ban been effective? There are loopholes (area's fished) that certain fishermen are using to avoid this berried lobster ban. The berried lobster ban needs to be national. The threat of further management to commercial boats is too much making it harder to retain quality crew and reduce income. Concerned about Brexit.
 - One respondent wants to know if berried hen ban has worked before more management? What is the increase in berried hens doing in relation to smaller crabs and lobsters?
 - Some fishers have pots on ground 365 days and haul irregularly. Concerned about those who use unpowered boats.
 - Any legislation would deter newcomers and be detrimental to the fishery which has already hugely declined over the past 40 years.
 - Brexit is complicating things - small boats need to diversify.
 - Some boats have no fish quota so must pot. Small boats feel victimised by restrictions.
 - There is only a finite amount of rough ground and the fishery is limited by tide and weather.
 - Could regulations be port specific as the fisheries are very different?
 - Concerned about wrasse removal as they eat lice and lice feed on bait. Should the review wait until after Brexit?
 - One respondent was against restrictions on boats under 6.5 m.
 - Two respondents are against closed seasons due to changes in climate and weather leading to reduced seasonality and changes in the dynamics of the fisheries.
 - One fisherman's association noted support for fishermen led zonal management in the form of an inshore potting agreement.
 - One respondent wants whelk fishers, trawlers and scallop fishers to be restricted by areas they can or cannot fish to reduce pot losses.
 - Another wants a restriction on whelking/trawlers to reduce pot losses. Whelk fishers/trawlers/scallop fishers' blanket fish the area making it too hard to fish without losing gear. For example, at Bembridge Ledge Buoy when there was three months of bad weather, there were six or seven scallop fishers.
 - One respondent requested that any management which is to be brought in to the fishery to be user friendly.
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