

Sussex IFCA Shellfish Permit Byelaw 2015 Review – First Steps – Stakeholder Engagement Report

February 2026

George Balchin & Sol Lucas, Sussex IFCA

Executive Summary

Sussex Inshore Fisheries and Conservation Authority periodically review its fisheries management byelaws to ensure they are fit for purpose. If changes or updates are required, appropriate stakeholder groups are invited to input through consultation.

The Sussex IFCA Shellfish Permit Byelaw 2015 is now under review. Consultation fatigue amongst the fishing community is currently high, however we view their input as key to effective management, and necessary for a co-design approach. As such, we conducted a snap survey and semi-structured interviews (SSI) with local fishers, focusing on Shellfish Permit Holders, to gather their views and ensure their input is captured at the very first steps of the management review process. Fishers were able to express a preference for the timing and location, in order to minimise any inconvenience and fatigue associated with the process.

The snap surveys asked short-form questions to quantify fishers' overall perception of the byelaw, specific byelaw conditions, as well as the fishery generally, and were subsequently analysed and summarised by Sussex IFCA. A thematic analysis of the SSI was conducted by Newcastle University to ensure any conclusions drawn were generated independently of the regulator and produce a detail-oriented report capturing the nuance in their views. The snap survey was designed to produce a concise, focused assessment of the byelaw, the SSI were designed to capture the richness of knowledge and opinions from the inshore fleet.

Both reports were then used to identify the priorities of fishers for the byelaw management review, and feed into the internal Sussex IFCA priorities, hopefully building trust in the process.

This report compiles both the snap survey (p.1-12) and semi-structured interview report (p.1-41), which will be presented to the Sussex IFCA Committee to ensure a full understanding of fisher's views before assessing any proposals made as part of the management review. We view this as crucial to ensuring that the process is effective, efficient, and fair.

Here we highlight key pages pertaining to views specifically on the byelaw conditions (note that page numbers refer to this compiled report, rather than numbering in the separate reports):

p.7, Snap survey report: Snap survey views on the catch return system

p.8, Snap survey report: Snap survey views on overall management of shellfish locally

p.9-11, Snap survey report: Snap survey views on specific permit conditions

p.12, 13, 16, 17, 19, 21, 23-27, 29-31, 33, SSI report: summary tables indicating fishers' views on issues with the byelaw and their suggested solutions. These tables have been collated by Sussex IFCA in a separate document, including an IFCA response and suggested actions.

The reports will form the basis of the discussion at the Sussex IFCA Technical Subcommittee meeting on **12th March 2026**. Following the meeting, Sussex IFCA will prepare proposals for the focuses of the byelaw review to take to a Principal Committee meeting on **23rd July 2026**.

Review of the Sussex IFCA Shellfish Permit Byelaw 2015

Snap survey question responses

January 2026

Sol Lucas – Senior Fisheries and Conservation Officer



Sussex IFCA Conservation and Research team conducted 26 interviews with 31 commercial fishers to gather fisher's opinions on the Shellfish Permit Byelaw 2015 (herein 'the byelaw'). Interviews were split into two parts. Part I contained open questions for a semi-structured interview (covered in the main report). Part II (covered in this Annex) contained closed questions to understand their demographics, fishing practices, business and if they do other work outside of fishing; of the 31 commercial fishers interviewed, 28 also completed Part II. This was to understand how important shellfisheries in Sussex are to their livelihood and their assessment of the byelaw. Fisher's provided Likert responses of their opinions on the fishery and its management and then asked if they would make any changes to specific conditions of the byelaw. Fishers were not required to answer any questions to take part and could skip questions if they wished. The fishers were asked questions verbally by the interviewer and responses were recorded by the interviewer on a questionnaire form.

The following sections summarise the answers given by commercial fishers (n=28, collected across 26 interviews). Responses for recreational fishers (n=5, collected across 3 interviews) were also recorded, but not included in this report, to ensure the views of commercial fishers are captured accurately, as the commercial fishery accounts for >99.9% of inshore shellfish landings in Sussex (from Sussex IFCA Shellfish Permit Byelaw 2015 catch return data, Table 1). The figure headings are the questions that fishers were asked.

Table 1. Proportion of commercial landings out of all shellfish landings in the Sussex IFCA district for the full period recorded on the catch returns database, between 01/02/2017 – 13/12/2025. Total landings were reported in kg for each species listed in the byelaw.

	Lobster	Edible Crab	Whelk	Cuttlefish	Prawn	Total
Commercial (kg)	158,386.4	779,708.9	8,145,705.3	862,714.5	944.0	9,947,459.0
Recreational (kg)	7,114.8	265.8	308.3	84.0	27.7	7,800.6
Total (kg)	165,501.2	779,974.6	8,146,013.6	862,798.5	971.7	9,955,259.6
Proportion of commercial landings (%)	95.7%	>99.9%	>99.9%	>99.9%	97.1%	99.9%

Participant's demographics and fishing activity

Fishers were asked to provide information about their fishing activities. Answers on number of years spent fishing, home port, target species, and pot numbers included free-text responses, which were then categorised. Answers on their work and business practices, whether they work outside fishing and whether they fish inshore or offshore, were tick-box categories. Figure captions contain details on how the data were collected and cleaned. Further detail on the answers is provided in bullet points below the figures.

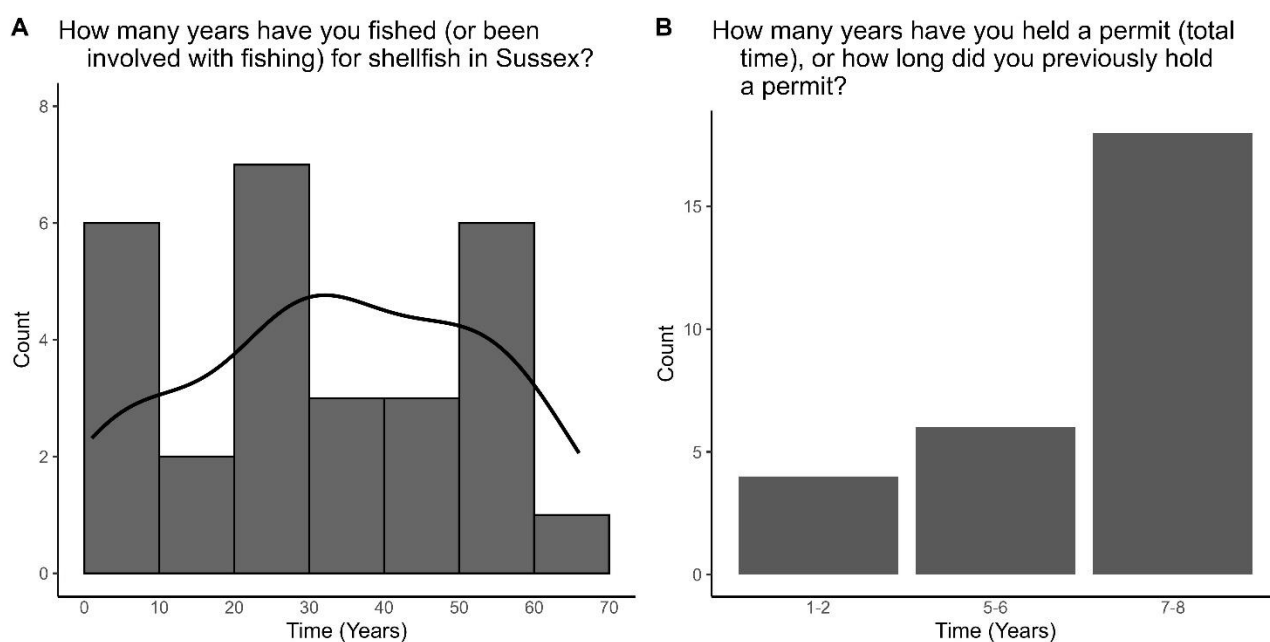


Figure 1. (A) Time spent fishing for shellfish in Sussex overall, with a density curve overlay on the histogram. (B) Number of years with a permit. Fisher answers were categorised into time bins for each plot.

- 46% of the fishers interviewed (n=13) have been fishing for shellfish in Sussex for over 30 years
- Most (79%, n=22) have 11+ years fishing experience and therefore worked in the fishery pre- and post-byelaw
- However, there are some newer fishers in the fleet with less than 10 years' experience (n=6), and that have held a permit for less than 3 years (n=3)
- 24 fishers were permit holders (47% of the 51 permit holders in the district), covering 36 permits (51% of the 71 permits in the district at the time of the study)
- Five fishers did not have a permit, and skipped for under the permit of someone else, with all but one having a minimum of 10 years shellfish fishing experience



Figure 2. Home ports listed from west to east in the Sussex IFCA district. At least one fisher was interviewed from every port in the district. Fishers that reported their home port as changing through the year were asked to give the port from which they mainly fish. Where fishers were the only person from their home port, they have been aggregated into other ports to protect their anonymity.

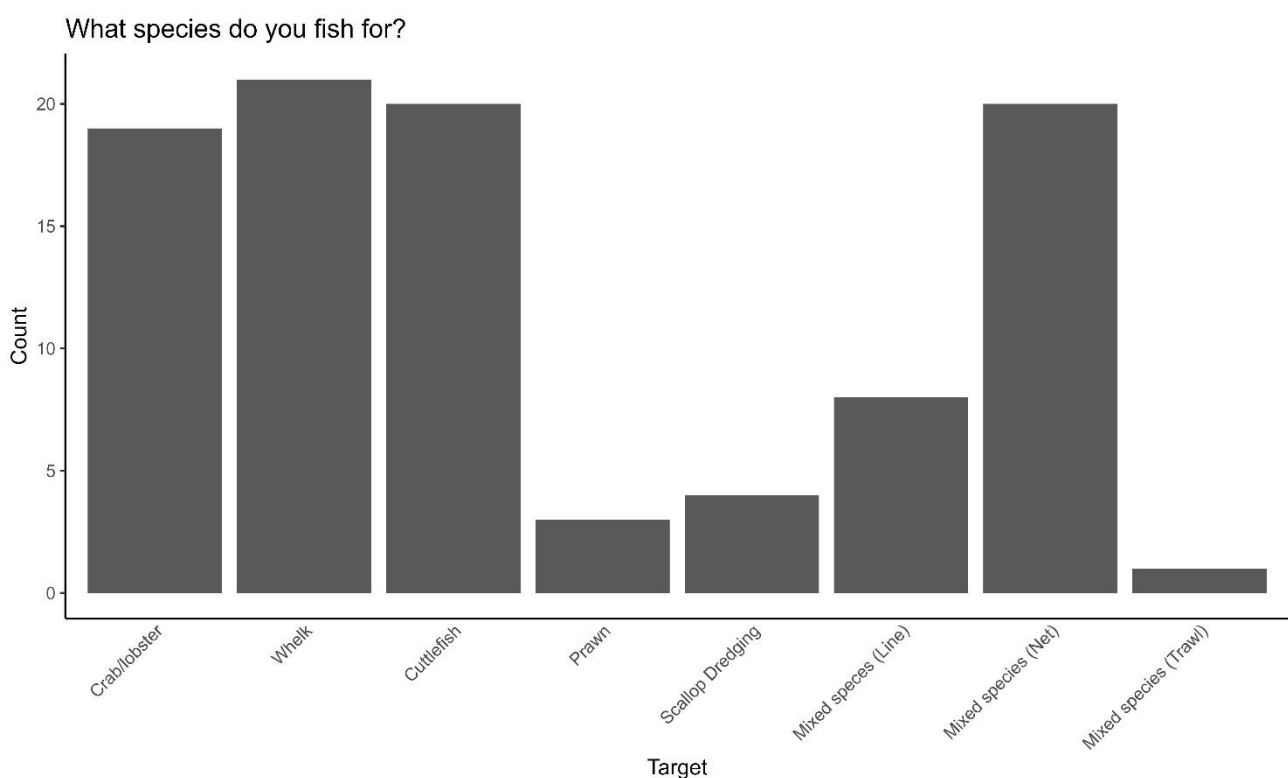
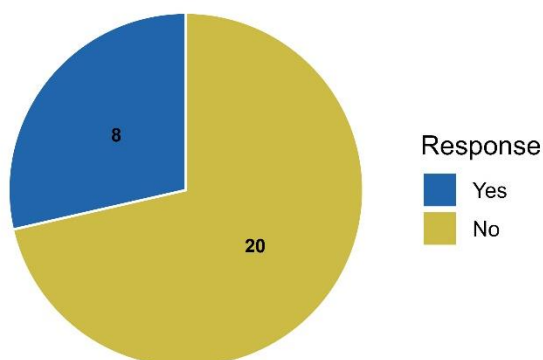


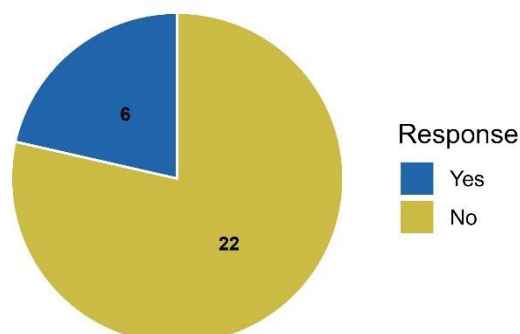
Figure 3. Target species: where the fisher also used other gears that do not have one specific target species, these were recorded as 'Mixed'.

- Pot and trap fisheries occur throughout the Sussex IFCA District
- Fishers generally use mixed gears (82%, n=23, report using more than one gear type), suggesting they move between different fisheries seasonally
- 18% (n=5) report that they fish only with pots/traps
- 79% of fishers (n=22) report using nets in addition to pots/traps; which was the most popular additional fishing gear for potters

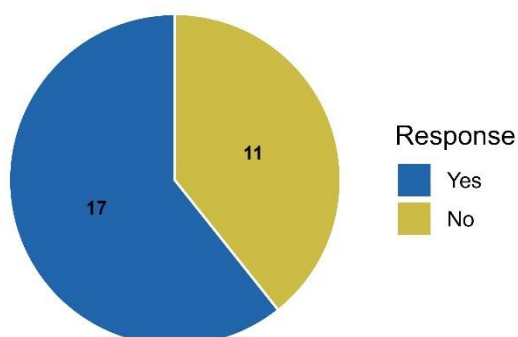
A Do you do other work outside of fishing?



B Does anyone else in your household work in the fishing industry?



C Does anyone in your household work outside of the fishing industry (other than you)?



D Do you fish only within 6nm, or also offshore?

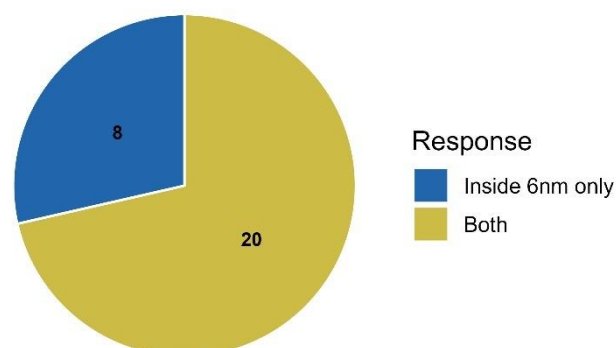
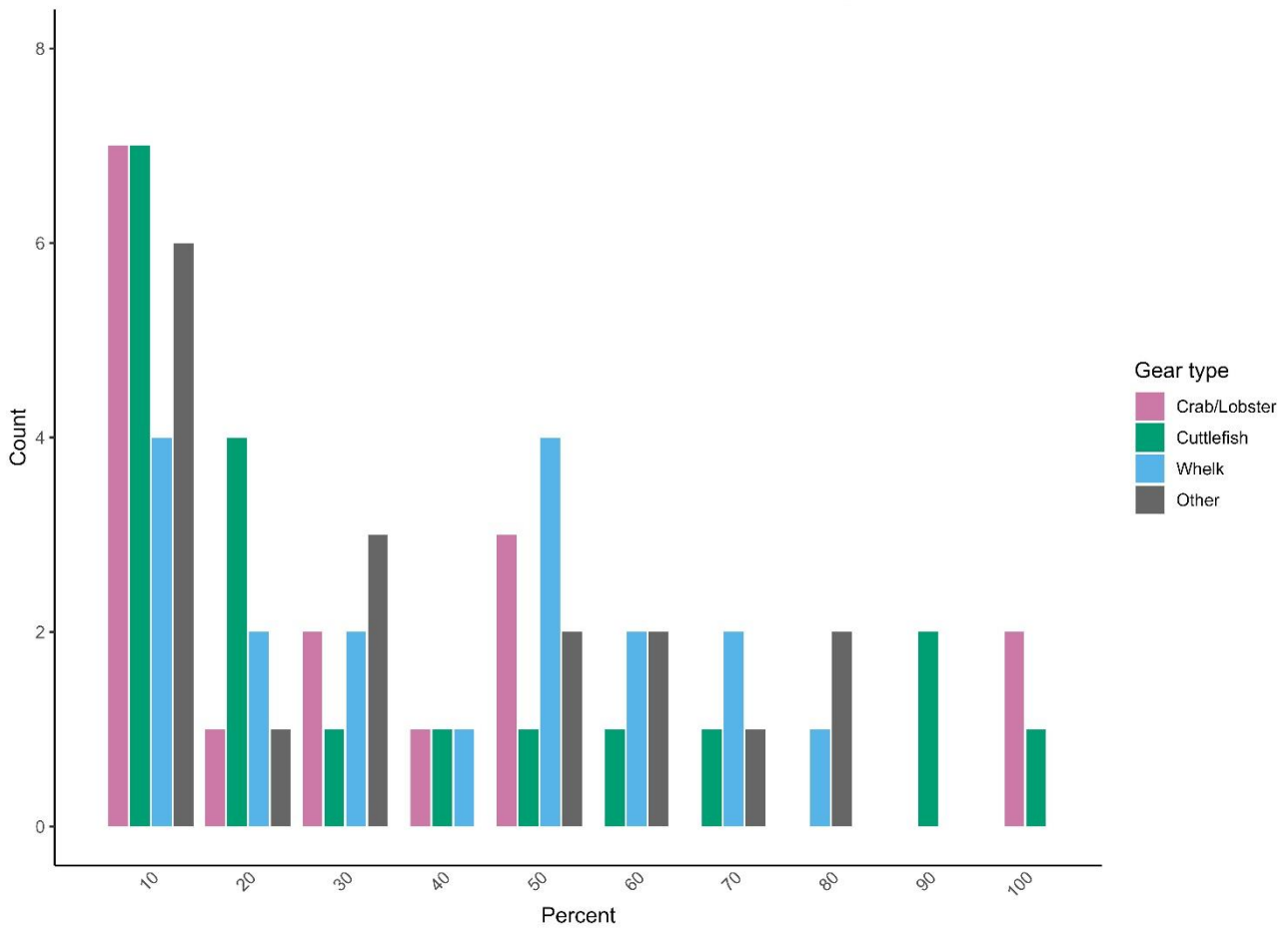


Figure 4. (A) Eight fishers work outside of fishing, although two of these reported that the work was in wholesale retail of fish. (B) Six fishers reported that someone else in their household works in the fishing industry and (C) 17 reported that someone else in their household works outside the fishing industry. (D) Eight fishers only fish inshore and the remaining 20 also fish offshore, outside 6NM. Of those eight, one person fishes with 340 crab/lobster pots and 120 cuttle traps. The remaining seven all fish with less than 250 pots overall.

- For 32% of fishers (n=9) their household income relies on the fishing, i.e. they do not work outside the fishing industry, and either no one else in their house works (n=7), or someone else in their household also works in the fishing industry (n=2)
- Of those nine fishers, three work only inshore, and six work both inshore and offshore (outside 6NM), suggested it is not unusual to rely on the inshore fishery for their livelihood
- Equally, of the fishers that work both inside and outside 6NM, 75% of them (n = 15) do not work outside of the fishery industry (although n = 9 had family members that do)
- The majority of fishers (71%, n = 20) fish both inshore and offshore as part of their business

A Over the full year, what proportion of your livelihood does each fishery equate to?



B Average contribution of each fishery to annual livelihood

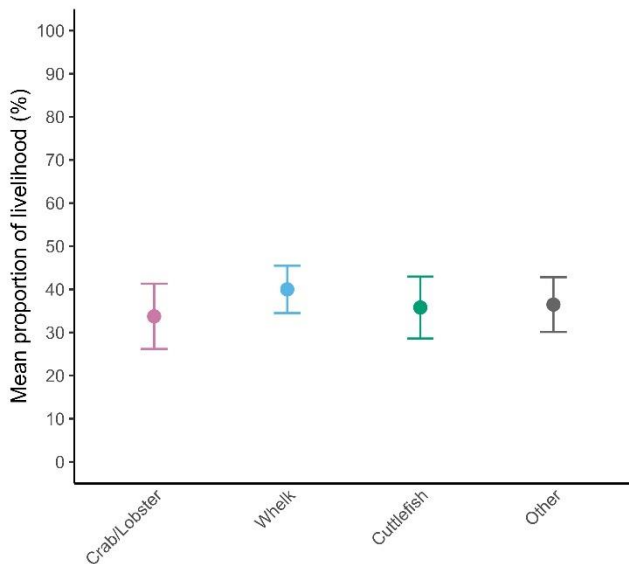
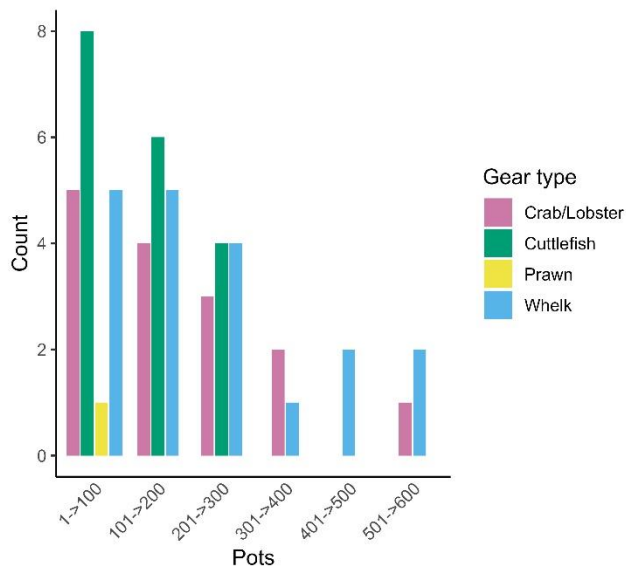


Figure 5. (A) Fishers were asked to approximate how much each fishery contributed to their livelihood, adding up to a total of 100%. Answers were recorded in bins in increments of 10%. Responses of 0% are not plotted. **(B)** The average percentage contribution of each species to fishers' business. Points show the mean percentage contribution for each species and error bars show $\pm$ standard error ($SE = SD / \sqrt{n}$). Values for each species are: crab/lobster (mean = 33.8%, SD = 30.3, n = 16, SE = 7.58), whelk (mean = 40.0%, SD = 23.3, n = 18, SE = 5.48), cuttlefish (mean = 35.8%, SD = 31.3, n = 19, SE = 7.19), other (mean = 36.5%, SD = 26.2, n = 17, SE = 6.36). Large SD values indicate substantial variability among individual fishers. Error bars ($\pm$ SE) are a measure of uncertainty of the mean. SE here shows that mean estimates were relatively precise.

- For 71% of fishers (n=20), pots/traps account for 70% or more of their income from fishing
- For 25% of fishers (n=7), pots/traps account for 50% or less of their business, although only one of this group fishes with more than 300 pots total across all gear types

A Approximately how many pots/traps do you actively fish with inside 6nm?



B Approximately how many pots/traps do you actively fish with outside 6nm?

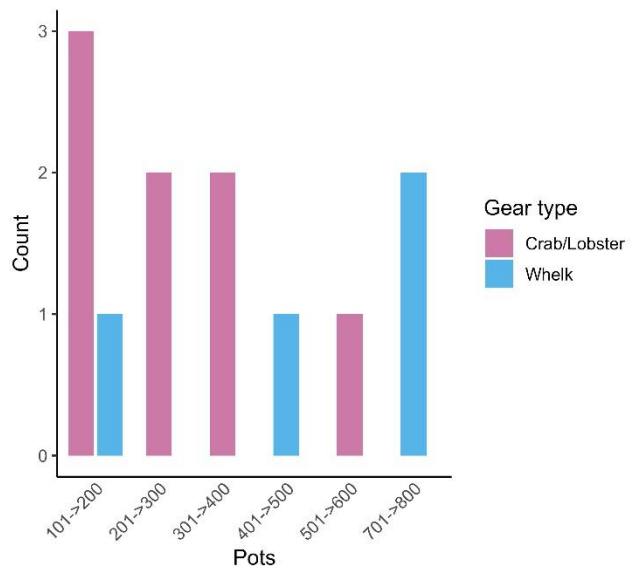


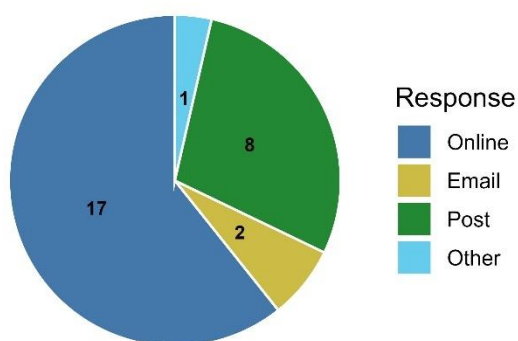
Figure 6. Fishers were asked to quantify how many pots/traps they actively use inside (**A**) and outside (**B**) the district. Number of pots/traps were given as a free text response, then these were aggregated into bins of 100 pots. No-one reported that they fish with cuttlefish or prawn traps outside of 6NM. Most of these traps are set within 3NM.

- Of those interviewed, 14 % (n=4) had the maximum number of pots for crab/lobster (600 pots), 21% (n=6) had the maximum for whelk (600 pots) and 18% (n=5) had the maximum for cuttlefish (300 pots)
- However, only one person reported actively fishing 600 crab/lobster pots in the district, two people reported actively fishing 600 whelk pots in the district and two people reported actively fishing 300 cuttlefish traps in the district
- 53% of crab/lobster fishers (n=8) also fish offshore, reporting use of up to 600 pots outside 6NM
- 26% of whelk fishers (n=5) also fish offshore, reporting use of up to 800 pots outside 6NM

Catch returns

Fishers were asked how they submit their catch returns and if a change to an online-only catch return system would work for them. These questions are self-explanatory and required little data cleaning, so further details on the answers are given in the figure caption.

A How do you send in catch returns to Sussex IFCA?



B Would a change to an online-only catch return system work for you?

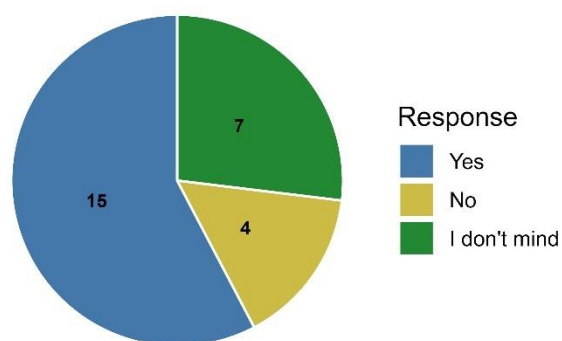


Figure 7. (A) Methods that the fishers currently use to submit catch returns. The one response of 'Other' was reported where one of the fisher's relatives does the catch returns for them, so they weren't sure how they were submitted. The eight fishers that responded 'Post' and one that responded 'Other' have fished for shellfish in Sussex for at least 29 years (mean = 46.7 years). **(B)** Four fishers said that an online-only catch return system would not work for them. Each of those four had fished for shellfish in Sussex for at least 45 years. Some fishers that responded 'Yes' or 'I don't mind' commented that a change may not work for other fishers.

Opinions on shellfish management in Sussex

Opinions of fishers on the shellfish management in Sussex were recorded on a Likert scale, which included options for “Strongly Disagree”, “Disagree”, “Unsure”, “Agree”, and “Strongly Agree”

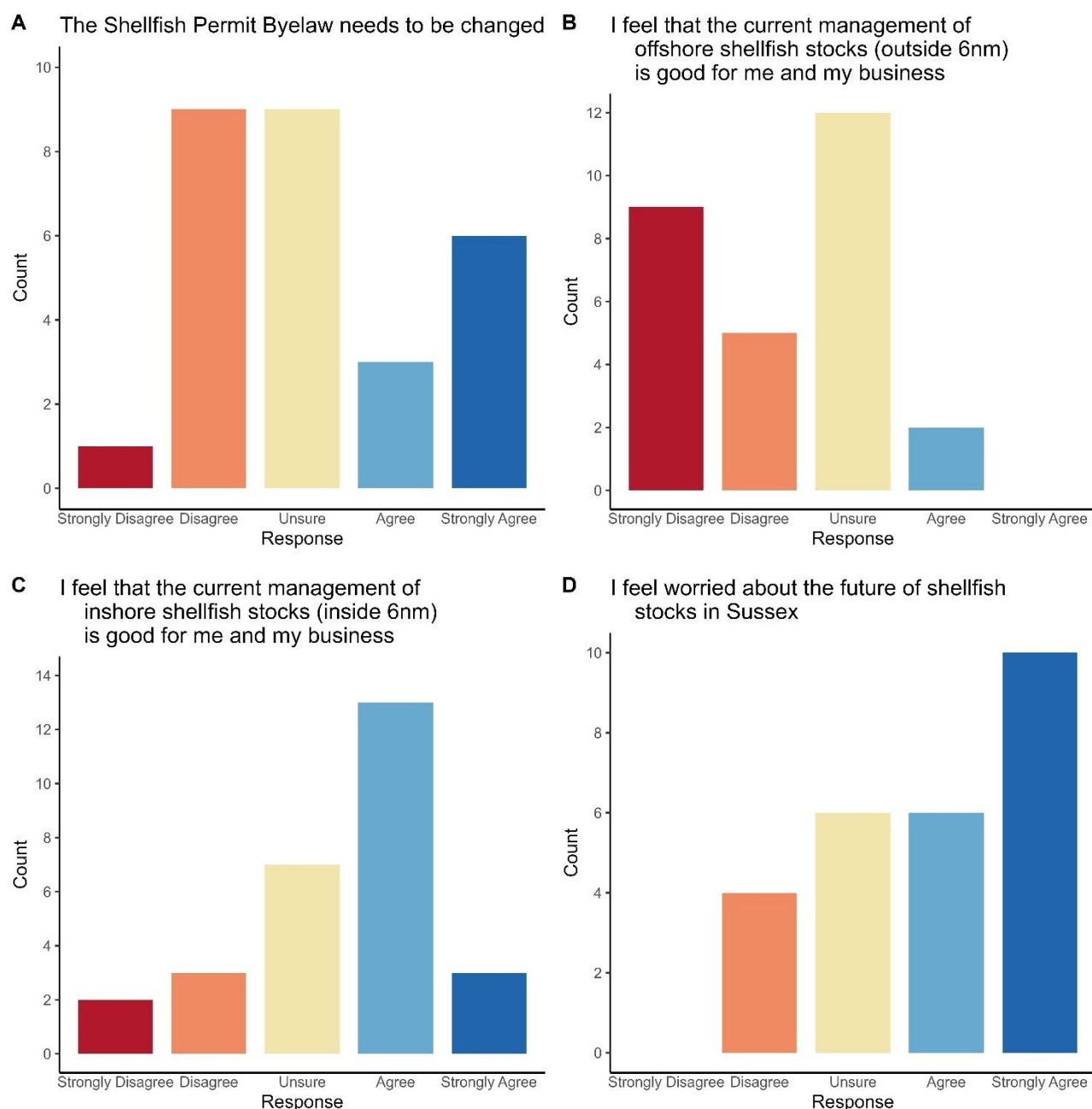


Figure 8. (A) Nine fishers ‘Agree’ or ‘Strongly Agree’ that the byelaw needs to be changed, although 10 fishers ‘Disagree’ or ‘Strongly Disagree’. (B) 14 fishers ‘Disagree’ or ‘Strongly Disagree’ that the management of offshore shellfish stocks is good for them or their business, citing that there was little management of stocks offshore. (C) 16 fishers ‘Agree’ or ‘Strongly Agree’ that the management of inshore shellfish stocks is good for them or their business. (D) 16 (61%) fishers ‘Agree’ or ‘Strongly Agree’ that they are worried about the future of shellfish stocks in Sussex. Two fishers did not respond to this statement, citing that if they voiced their concerns over shellfish stocks, that new quotas would be introduced to further restrict their fishing efforts.

- There were a range of opinions on whether byelaw needs to be changed, however the majority (61%, n=16) are concerned about the future of shellfisheries in Sussex

- The majority of fishers felt inshore management was benefitting them (57%, n=16), however the view of offshore fisheries was different, with half disagreeing or strongly disagreeing (n=14), 43% unsure (n=12) and only 7% (n=2) agreeing that management of offshore shellfish stocks was good for them or their business

Changes to the current byelaw or permit conditions

Fishers were asked 'Considering the following permit conditions, what would you change, if anything?'. Fishers were given discrete categorical options to respond to, which are listed in the figure captions. They were not required to reply with a verbatim answer fitting the discrete options, but if their answer did not match with any of the answers, their response was recorded as 'Other'. Further details on their answers are provided in the figure captions.

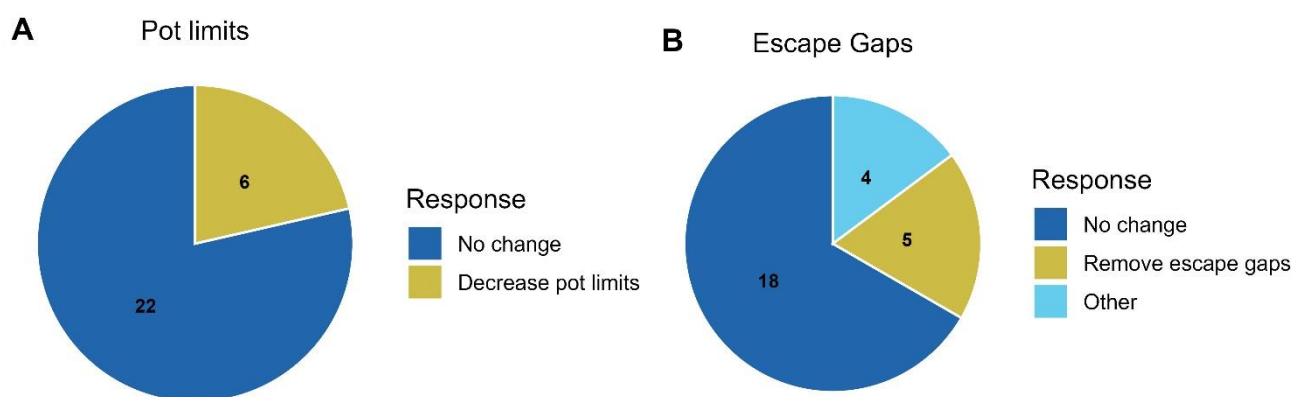


Figure 9. (A) Fishers could respond: No change; Decrease pot limits; Increase pot limits; Other. Of the six fishers that called for reductions in pot limits, five of them used less than 250 pots/traps overall. **(B)** Fishers could respond: No change; Increase escape gap size; Decrease escape gap size; Remove escape gaps; Other. Of the five that responded 'Remove escape gaps', two fishers only targeted cuttlefish. The responses of 'Other' included two responses to continue investigating what the appropriate size should be, to keep up with increasing minimum sizes, and one reported that escape gaps don't make a difference.

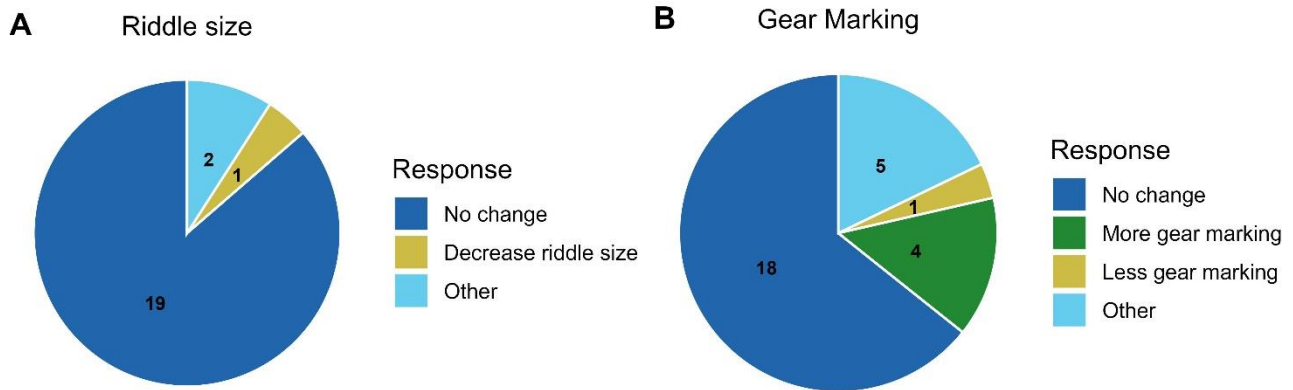


Figure 10. (A) Fishers could respond: No change; Decrease riddle size; Increase riddle size; Other. The two responses of ‘Other’ requested that riddles should have a consistent size inside and outside 6NM. Fishers commented that riddles were not being used correctly, or that the whelks that passed through riddles are sometimes still retained. **(B)** Fishers could respond: No change; More gear marking; Less gear marking; Other. Two of the responses of ‘Other’ requested that flexibility is required for gear marking in rough tidal conditions to allow for use of subsurface buoys for safety, but two requested that increased gear marking should be required, such as use of dahns unless there are strong winds, and not the cans or plastic containers that are sometimes used. One response requested that Sussex IFCA provide tags to mark buoys with their information, as the buoys get dirty and markings rub off.

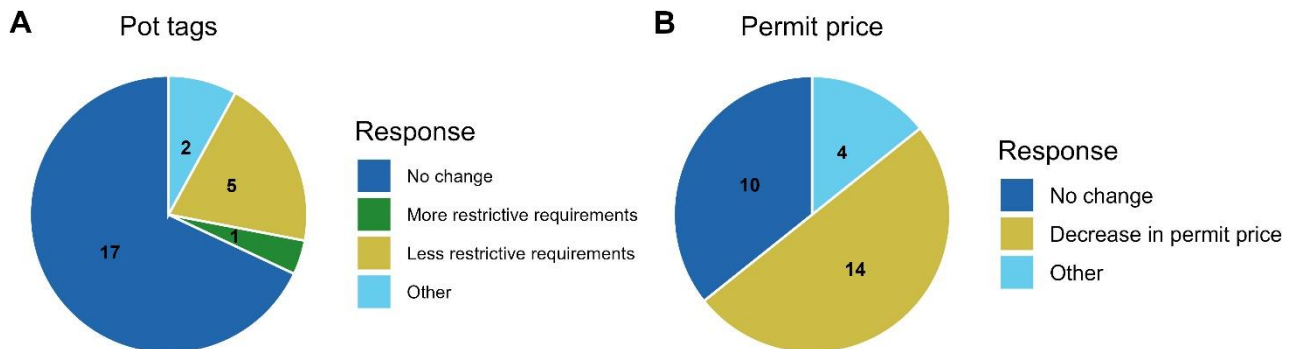
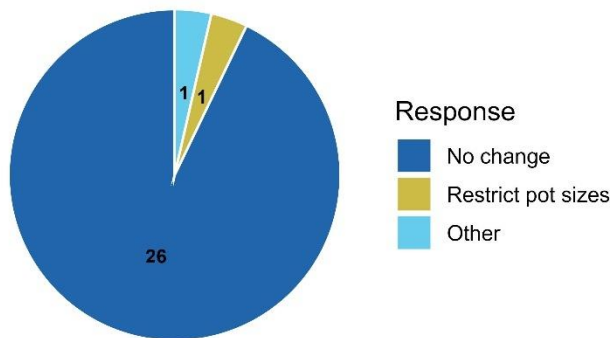


Figure 11. (A) Fishers could respond: No change; More restrictive pot tagging requirements; Less restrictive pot tagging requirements; Other. It was left up to the fisher to interpret what would constitute more or less restrictive requirements. Fishers commented that the cost of tags should be lowered or removed and that tags should be made of metal, or be able to be re-stamped, so they last longer and stay on the pots. One fisher suggested that there are loopholes in the tagging system that are used by some to fish over their pot limit. One fisher called for re-use of pot tags, and one requested an extension to the permit duration so tags could be re-used. **(B)** Fishers could respond: No change; Increase in permit price; Decrease in permit price; Other. Of the four that answered ‘Other’, fishers suggested that the permit price should depend on how many pots the fisher has, and that recreational fishers should pay the same as the commercial fishers. Alternatives to a decrease in price included making the permit term longer than 2 years.

A Pot sizes (currently no restrictions)



B Would you consider v-notching lobsters over a set maximum size?

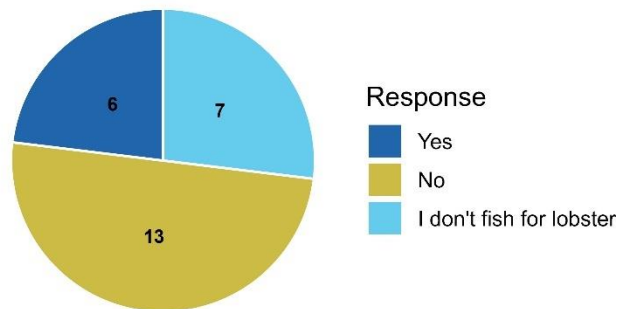


Figure 12. (A) Fishers could respond: Do not restrict pot sizes (No change); Restrict pot sizes; Other. One fisher that answered 'Other' suggested parlour pots should be phased out in favour of inkwell pots. **(B)** Fishers could respond: Yes; No; I don't fish for lobster; Other. Fishers did not provide a specific answer to this question. Fishers commented that if, and at what maximum size a lobster should be returned, should be left to the discretion of the fishermen (n=3), and that the ban on landing berried lobsters should continue (n=2). One fisher commented that v-notching would not make a difference, and one said it would be a pain at first, but good in the long run.

Would you be interested in joining future discussions on shellfish or fisheries management?

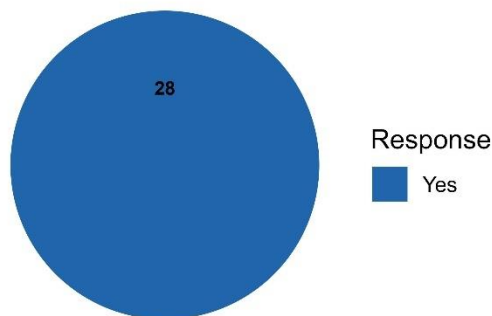


Figure 13. All fishers said they would be interested in being involved in future conversations on shellfish or fisheries management.

Final comments

Fishers were asked if they had any final comments, recorded in a free-text box. Responses including concerns regarding the following issues:

- Concern over the consultation process and the presence of the public in consultation meetings (n=1)
- Concern over lack of management offshore (n=2)
- Concern over the lack of support for the inshore fleet (n=1)
- Overpopulation of seals (n=3)
- Poor communication and lack consultation with fishers from Sussex IFCA when creating byelaws (e.g. netting permits; n=2)
- Reminders for catch returns would be useful (n=1)
- Duplication of catch returns between the MMO and IFCA (n=1)
- Control over the entry process into the fishery and concern over new entrants (n=1)
- Concern over dredging for aggregate (n=1)
- Calls for increased patrols and tougher penalties for breaking the byelaws, including freezing the license (n=3)
- Preference for face-to-face and 1-2-1 interactions and paper forms, rather than public meetings and online forms (n=5)



Sussex IFCA Shellfish Permit Byelaw 2015 Review

Insights from Commercial and Recreational Fishers

Written by:

Ainsley Hatt, Phoebe Lewis &
Dr Sarah Coulthard

Reviewed by:

Dr Sol Lucas & Dr George Balchin

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Executive Summary

This report has been commissioned by Sussex Inshore Fisheries and Conservation Authority (IFCA) to present findings from 29 interviews with 36 commercial and recreational shellfish fishers operating within the Sussex IFCA District, undertaken to inform the review of the Sussex IFCA Shellfish Permit Byelaw 2015. Of those interviewed, 24 fishers were commercial shellfish permit holders, representing 47% of the 51 shellfish permit holders in the district. The research focuses on fishers lived experiences of the shellfish fishery and management in Sussex and how current arrangements affect livelihoods and wellbeing.

Three research questions guide the analysis. Research Question 1 explores what fishers need to live well and what is important to them as a shellfish fisher in Sussex. Fishers consistently emphasise the importance of earning a viable and predictable income, having secure access to fishing grounds, and operating within a management system that is fair, clear, and consistent. Trust, respectful relationships with regulators, and the ability to plan for the future are also central to living well.

Research Question 2 examines prevailing views on the Shellfish Permit Byelaw 2015. Fishers broadly support many sustainability measures in principle; however, across interviews they frequently raise concerns about the practical enforceability of specific measures, particularly pot limits, escape gaps and riddles, and pot tagging requirements, alongside calls for proportionate and consistent enforcement. Permit costs and permit numbers are also commonly raised concerns, and administrative requirements such as monthly returns are widely viewed as contributing to cumulative regulatory burden. Overall, measures are most strongly supported where they are simple, effective, enforceable, and perceived as fair, and where concerns arise, fishers tend to propose refinements rather than removal of existing measures.

Research Question 3 focuses on management of the inshore crab stock and its decline. Fishers identify multiple interacting factors that they believe may be contributing to declining stocks, including fishing activity, non-fishing pressures, and environmental change, and express uncertainty about the relative importance of these drivers. Alongside this, fishers propose potential solutions, highlighting both the complexity of managing mixed fisheries and the limits of inshore fisheries management alone.

Overall, the report shows that fishers value regulation that is practical, proportionate, and transparent, and that supporting livelihoods and wellbeing is closely linked to the perceived legitimacy of management.

This research was conducted as a collaboration between Sussex IFCA and Newcastle University. Sussex IFCA led participant recruitment and conducted all interviews, while Newcastle University researchers undertook qualitative analysis and authored the report, with findings reviewed and discussed collaboratively between project partners.

Introduction

This report presents findings from qualitative research exploring commercial and recreational fishers' experiences of shellfish management within the Sussex IFCA District. The research has been undertaken in the context of the **review of the Sussex IFCA Shellfish Permit Byelaw 2015 (herein 'the byelaw')**, providing an opportunity to reflect on how the byelaw is functioning in practice and how it is experienced by those directly affected by it. Rather than evaluating the byelaw solely against regulatory or biological objectives, the report focuses on shellfish fisher perspectives, in-line with Sussex IFCA's co-design principles and recognising that lived experience, practicality, and perceived fairness play a central role in shaping engagement with management measures.

The Sussex shellfish fishery supports a diverse range of fishing practices, vessel types, and business models. Fishers operate within an increasingly complex management environment (IFCAs, Marine Management Organisation, Marine & Coastguard Agency), where regulatory requirements interact with environmental change, market pressures, and cumulative spatial constraints. Against this backdrop, the byelaw review provides an important moment to examine not only the technical operation of specific measures, but also how they intersect with fishers' ability to maintain viable livelihoods and quality of life.

The research is structured around three interconnected research questions.

Research Question 1 asks: what do shellfish fishers in the Sussex IFCA District need to live well? This question looks beyond the specific conditions of the byelaw to consider fishers' broader experiences of wellbeing and satisfaction in their work. The open nature of this question allows fishers themselves to steer the direction of the interview, highlighting topics that they feel are most relevant to their lives as a shellfish fisher in Sussex. As such, it explores themes that include income stability, access to fishing opportunities, enforcement and management, relationships with regulators and other fishers, and the ability to plan for the future. This approach situates regulatory measures within the wider context of what fishers identify as necessary for a good quality of life, supporting new conversations about topics which may not be immediately obvious to fisheries managers, but are in fact very relevant to life as a fisher and effective management.

Research Question 2 asks: What are the prevailing views over what's working well, concerns, and solutions regarding the byelaw? This section examines shellfish fisher experiences of specific management measures, including permits, gear requirements, reporting obligations, enforcement approaches, and communication. The analysis highlights aspects of the byelaw that fishers perceive as working well, areas where measures are experienced as ineffective, burdensome, or unclear, and solutions or

refinements proposed by fishers themselves. The aim is not to assess regulatory effectiveness in isolation, but to understand how the byelaw operates in practice and how it is perceived by fishers in terms of legitimacy, proportionality, and fairness.

Research Question 3 asks: Given that crab and lobster are fished with the same gear, but crab is in decline, what can be done to benefit crab stocks without unnecessarily impeding access to the lobster fishery? This section addresses concerns about the decline in crab stocks and the analysis focuses on fishers' perspectives on drivers of change, including fishing activity, non-fishing pressures, and environmental factors, as well as the potential solutions they put forward. This question reflects the prominence of crab decline as a concern within the fishery and recognises the value of fishers' local knowledge and observation in understanding complex, interacting pressures. Data collected here have clear relevance to national and international recognition of the decline in UK brown crab populations highlighted in 2025 by the MMO¹, the Marine Conservation Society², ICES³ and others, and further compounded in southwest England by the recent surge in common octopus⁴.

The findings presented in this report are based on semi-structured interviews conducted by Sussex IFCA Conservation and Research Officers with shellfish fishers operating across different ports, vessel sizes, and fishing strategies. Interview data were coded thematically, and analysis was conducted to identify prevailing views, concerns and potential solutions. Throughout the report, care is taken to distinguish between views that are widely shared and those raised by a smaller subset of participants.

Overall, this report aims to provide an evidence-based account of shellfish fisher perspectives at a key moment in the byelaw's review cycle. The report documents how management measures are experienced on the ground, and seeks to inform reflective discussions about the future direction of shellfish management within the Sussex IFCA District. The qualitative assessment and suitability of byelaw measures will generate information that will be fed into Sussex IFCA's management review process.

¹ [MMO Report: South West brown crab: MCRS survey results](#)

² [Article: "Urgent action needed" to stem UK crab and lobster declines](#)

³ [Article: ICES brown crab report charts widespread stock decline](#)

⁴ [Article: Unprecedented alliance launches major study into octopus bloom](#)

Methodology

Roles and responsibilities

Sussex IFCA led interview recruitment and data collection, with IFCA Conservation and Research officers conducting all interviews and managing consent, recordings, and transcript quality assurance. Anonymised transcripts were shared with the Newcastle University project team, who led qualitative coding, analysis, and preparation of the report, with findings discussed collaboratively between project partners.

Data collection and interviews

This report is based on analysis of semi-structured interviews conducted by Sussex IFCA with commercial and recreational shellfish fishers operating in Sussex. Interviews were designed to inform analysis of the following research questions:

- RQ1: What do commercial fishers need to live well?
- RQ2: What are the prevailing views over what's working well, concerns, and solutions regarding the Sussex IFCA Shellfish Permit Byelaw 2015?
- RQ3: Given that brown crab and lobster are fished with the same gear, and the historical and continued decline of brown crab, what can be done to benefit brown crab stocks (without impeding access to the lobster fishery)?

Interviews explored fishers' experiences of shellfish fishing, views on the byelaw, and broader perspectives on management and livelihoods.

In total, 26 interviews were conducted with commercial fishers, either individually or in small groups, resulting in contributions from 31 individuals, and three interviews were conducted with recreational fishers, resulting in contributions from five individuals⁵. These groups are analysed separately to reflect differences in fishing activity, regulatory context, and engagement with the fishery, with commercial fishing undertaken as a business activity and recreational fishing primarily for sustenance or leisure.

All interviews followed a common interview guide, and interview questions were designed to support analysis of Research Questions 1, 2, and 3:

1. What do you need to live well as a shellfish fisher in Sussex^{6,7}?

⁵ These contributions were from fishers from seven ports across the district. Further demographics were captured in a short-form questionnaire, of which, results are contained in a separate report.

⁶ Asking fishers about their capacities to live well in the context of their lives 'as shellfish fishers in Sussex' establishes a useful boundary for discussions to remain relevant to the context of the shellfish byelaw, as per the project objectives. Whilst this helps visualise the (sometimes hidden) connections between fisheries management and fisher wellbeing, we also recognise that many other factors, beyond fisheries management, contribute to a person's wellbeing, which may not have been covered here and lie beyond the scope of this project.

⁷ This question was deemed less relevant to recreational fishers, so for the three interviews with recreational fishers, we instead asked: 'Can you tell me a bit about why you have a recreational permit to fish for shellfish?'

2. What is working well about the Shellfish Permit Byelaw?
3. What is not working well about the Shellfish Permit Byelaw?
4. What solutions do you see to the problems you have described?
5. Given that brown crab and lobster are fished with the same pots, but brown crab is in decline and lobster is showing signs of recovery, how would you manage their fishing in Sussex⁸?
6. Is there anything else you would like to say about the Shellfish Permit Byelaw?

Ethical considerations

All interviews were conducted by Sussex IFCA Conservation and Research officers. Research ethics were reviewed internally by Sussex IFCA and the Newcastle University project team. All interviewees gave informed consent to participate, were informed of their right to withdraw at any time and were assured full anonymity. Interviews were audio recorded for accuracy, transcribed, anonymised, and recordings were subsequently deleted. No personal or identifiable data were collected, and participants were initially invited using existing permit holder records held by Sussex IFCA. Anonymised transcripts were shared with university researchers for analysis and reporting and may be used in future scientific publications and management processes.

Interview coding and analysis

Transcribed interviews were imported into NVivo⁹ qualitative analysis software for coding and analysis. Analysis was undertaken by the project team using an inductive thematic analysis approach, informed by established principles of thematic analysis¹⁰ and guided by the study's research questions.

Each transcript was reviewed in full, and codes were applied where participant comments were identified as relevant to one of the research questions. Where similar issues were raised across interviews, additional references were added under shared codes. This process resulted in the development of a comprehensive list of codes capturing the range of issues discussed by participants.

During initial coding, no formal themes were defined. Following completion of coding, codes were reviewed, compared, and iteratively grouped into broader themes and sub-themes that reflected recurring patterns in participant perspectives and aligned with the research questions.

⁸ This question was only asked to fishers who fish for crab or lobster.

⁹ NVivo is a widely used qualitative data analysis software that supports the organisation and coding of interview and text-based data. General information on NVivo is available from [QSR International](https://www.qsrinternational.com/).

¹⁰ For an accessible overview of thematic analysis as a qualitative method, see [Braun and Clarke \(2006\)](#).

To support consistency in coding within the project team, the first three transcripts were double-coded and discussed, and minor refinements were made to the coding approach before analysis proceeded across the remaining interviews.

Theme development and reporting

Themes and sub-themes were developed through structured synthesis of coded material and are intended to represent prevailing views expressed across interviews, rather than to quantify levels of agreement or statistical prevalence.

For RQ1, themes describe the conditions associated with living well as a shellfish fisher in Sussex. For RQ2 and RQ3, themes capture prevailing views, concerns, and suggested solutions relating to the byelaw and shellfish management more broadly.

Where appropriate, tables report the number of interviews in which a theme or sub-theme was raised, to provide transparency regarding how widely issues were discussed across the dataset. Findings are presented in a descriptive manner, with synthesis prioritised over extensive detail to support clarity and accessibility for a policy and management audience.

It is important to note that findings reflect fishers' perceptions and lived experiences as expressed in interviews. The report does not assess the accuracy of individual perceptions but presents them to inform understanding of how management is experienced and understood. Where divergence occurs, this should be taken to indicate gaps in communication, transparency, or shared understanding, with the aim that this information be helpful and informative to both fishers and the regulator (Sussex IFCA).

Results

RQ1 – Living well as a commercial fisher

This research question explores how commercial inshore fishers describe what they need to “live well” within the context of shellfish fishing in the Sussex IFCA District.

Analysis identified five overarching themes; within each theme, a number of key elements capture how these themes are experienced in practice. The findings presented here reflect prevailing views expressed across interviews and are grounded in fishers’ descriptions of ecological, operational, economic, social, and governance-related factors that shape their ability to live well.

Table 2: Key themes and elements of living well identified across interviews¹¹.

Theme	Key elements to living well
Fish stocks	• Available catch • Healthy fishery • Long-term sustainability
Fishing activity	• Access to grounds • Flexibility to adapt • Effort and work life balance • Safety at sea
Financial viability	• Balancing incomings and outgoings • Predictability and planning • Retirement and entry
Fishing identity	• Identity • Way of life
Governance and management	• Regulatory burden and proportionality • Accessibility and understanding • Evidence, knowledge, and responsiveness • Enforcement and management

Elements of living well

Fish stocks

Across interviews, fish stocks are consistently described as the most fundamental requirement for living well. Fishers repeatedly emphasise that without sufficient shellfish available to catch, other considerations such as prices, costs, or management arrangements become secondary. Living well is therefore frequently described in practical terms, centred on whether sufficient catch is available to support ongoing fishing activity.

¹¹ For RQ1, the aim is to capture how fishers conceptualise living well in practice rather than to quantify the prevalence of specific factors. As such, the number of interviews in which elements of living well are mentioned are not included since discussions of wellbeing are often holistic making frequency-based reporting less informative.

Beyond available catch, fishers also discuss the importance of a healthy fishery, one that continues to produce viable catches while showing visible indicators of resilience, such as the presence of berried hens¹². Water quality is also identified as an important factor associated with a healthy fishery.

Additionally, long-term sustainability is viewed as an important element of living well. Fishers describe stock stewardship as essential to their own future and to the viability of the next generation of fishers and raise the importance of allowing grounds time to recover, whilst avoiding excessive concentration of effort.

Fishing activity

Living well is strongly shaped by the ability to carry out fishing activity in a way that is practical, efficient, and safe. Access to fishing grounds is identified as a key requirement, with fishers describing increasing spatial pressure from Marine Protected Areas and other marine industries, seal depredation, the seasonal presence of spider crabs, and gear conflict. These pressures are perceived as reducing effective access to fishing grounds and concentrating fishing effort into smaller areas.

Effort and efficiency are also discussed as components of living well. Fishers emphasise the importance of achieving sufficient landings for the time and physical effort invested, with high landings per unit of effort associated with improved work–life balance. Where more effort is required to achieve the same returns, fishing is described as becoming increasingly demanding and less sustainable.

Flexibility to adapt fishing practices is also viewed as essential. Inshore fishing is described as inherently seasonal and variable, requiring the ability to target what is locally available at different times of year. Rules or restrictions that limit the ability to adapt by constraining gear types, and access to species or fishing grounds, are perceived to undermine this flexibility.

Fishers also commented on the importance of being able to work safely, with safety understood not only in terms of formal requirements but also through experience, working practices, and the ability to crew vessels appropriately.

Financial viability

Financial viability is consistently framed in terms of economic sufficiency rather than profit. Fishers emphasise the need to balance incomings and outgoings in order to earn enough to live and to keep fishing businesses operating. Outgoings are described as substantial and wide-ranging, including vessel purchase and maintenance, fuel, bait,

¹² Berried hens describes when female lobsters are laden with eggs.

gear, licences, insurance, berthing, refits, inspections, and safety equipment, alongside household costs such as rent or mortgages, bills, and family commitments.

The ability to support oneself financially without needing to take on a second job is described as central to living well, with many participants commenting that they are currently unable to achieve this. Rising costs are also widely viewed as the biggest barrier to new entrants, contributing to concerns about the future of the inshore fishing sector.

Predictability and the ability to plan are also identified as important. Reliable catches and stable market prices are viewed as necessary for planning expenditure, managing maintenance and vessel refits, and maintaining financial stability. Unpredictable earnings are described as increasing stress and uncertainty, even where average income may be sufficient over time.

Financial viability is discussed across the full life cycle of fishing. Fishers raise concerns about the ability to earn enough to retire and to sell vessels or licences at the end of their career. At the same time, uncertainty around entry and succession is highlighted, with doubts expressed about whether the industry offers a viable or prosperous future for new entrants. Access to grants is viewed as important in supporting viability, helping with costs, and enabling adaptation or diversification.

Fishing identity

Beyond ecological and economic conditions, living well is also described in terms of identity and attachment to fishing as a way of life. Fishers emphasise the importance of being viewed as providers of food rather than those who seek to exploit marine resources to the detriment of the environment in which they work.

Autonomy is a central component of this theme. The ability to work for oneself and manage one's own time is described as a key reason for remaining in fishing, even in the face of financial and operational challenges. Independence and self-direction are viewed as integral to the appeal of the occupation.

Enjoyment of fishing is also discussed. Participants describe fishing as something they continue to do because they love it, with excitement, satisfaction, and pride remaining strong motivators. However, fishers are clear that enjoyment alone cannot compensate for sustained economic or ecological decline, and that attachment to fishing as a way of life exists alongside growing uncertainty about its future and the quality of life it can provide.

Governance and management

Governance and management are widely viewed as shaping whether fishing remains viable and worthwhile. Fishers frequently describe regulatory burden and over-regulation as undermining their ability to live well, with complex or numerous requirements perceived as discouraging participation and increasing frustration.

Recognition of the practical realities of small inshore vessels is viewed as important. Fishers emphasise the need for management approaches that reflect the nature of inshore fishing and for support that takes account of varying levels of computer literacy. Where regulatory systems or communication rely heavily on digital engagement, this is perceived as creating additional barriers.

Evidence, knowledge, and responsiveness are also central to living well. Fishers emphasise the importance of decisions being based on good scientific evidence and of management responding quickly where new fisheries emerge or conditions change. Research into emerging issues affecting stocks and livelihood viability is viewed as necessary, alongside proactive support from fisheries management to assist on challenges such as diversification.

Enforcement and management are described as needing to be fair, proportionate, and meaningful. Fishers emphasise the importance of consistent enforcement and penalties that deter rule-breaking behaviour, alongside effective management of other sea users.

Relationships with fisheries management bodies are highlighted as an important component of governance. Fishers value two-way relationships, friendly interactions, and face-to-face engagement that it is not solely focused on enforcement. Being consulted on regulatory changes and feeling heard are viewed as important for trust, legitimacy, and cooperation.

Summary

Across the interviews, living well is closely associated with the continued presence of healthy, productive stocks, with sustainability framed as essential to both present and future livelihoods. Living well is framed less in terms of high income or growth and more as the ability to sustain a modest, viable livelihood over time. Taken together, the findings indicate that living well as a commercial inshore shellfish fisher in Sussex reflects a balance between ecological conditions, effective fishing activity, financial sufficiency, occupational identity, and governance arrangements perceived as fair, practical, responsive, and underpinned by constructive relationships.

RQ2 - Sussex IFCA Shellfish Byelaw: prevailing views over what's working well, concerns, and solutions

This research question explores commercial and recreational fishers' views on the byelaw and how its measures are experienced in practice within the Sussex IFCA District.

Analysis identified a set of recurring themes, within which specific measures and issues capture how the byelaw is understood, implemented, and perceived by fishers. The findings presented here reflect prevailing views expressed across interviews and are grounded in fishers' accounts of conservation measures, regulatory requirements, enforcement, and their cumulative effects on fishing activity and livelihoods.

Table 3: Key themes and sub-themes identified in interviews on what is working well, areas of concern, and potential improvements relating to the byelaw. The table also includes the number of interviews in which each sub-theme was mentioned in both commercial and recreational interviews.

Theme	Subtheme	Commercial mentions [/26]	Recreational mentions [/3]
Permit system	Permit costs	12	1
	Permit numbers	10	0
	Permit communication	3	2
Gear marking	Pot tags	11	1
	Tag replacement	8	0
	Surface markers	6	1
Gear restrictions	Pot limits	21	2
	Escape gaps and riddles	11	1
Monthly catch returns	Administrative burden	12	0
	Data quality and accuracy	5	1
Catch rules	Berried hens and v-notching	9	1
	Closed areas and seasonal restrictions	5	0
	Quota	2	0
Enforcement & relationships	Enforcement approach	10	2
	Relationships	7	1

Permit system

Interviewees expressed a range of views relating to the permit system. These are grouped into three sub-themes: permit costs, permit numbers, and permit communication.

Table 4: Summary of prevailing commercial views, concerns, and proposed solutions related to the permit system, as well as the number of interviews that mention each subtheme (out of the 26 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Permit costs ¹³ [12/26]	Permit costs are perceived by many commercial fishers to be high when combined with other licensing and operational fees.	Reduce or remove permit costs.
	Permit costs are viewed as disproportionate for seasonal or low-effort fishers.	Link permit costs to fishing effort or number of pot tags held.
	Some fishers are uncertain about what permit costs are used to fund.	<i>No solution identified.</i>
	Some commercial fishers perceive recreational permit costs as comparatively unfair.	Increase recreational permit costs.
Permit numbers [10/26]	The number of permits issued is perceived as excessive in certain areas.	Limit the total number of permits issued.
	The concentration of fishing activity in certain areas is leading to gear conflict.	<i>No solution identified.</i>
	Recreational permits are viewed as adding pressure in areas where commercial fishing is struggling.	Remove or limit recreational permits in specific areas.
Permit communication [3/26]	Byelaw wording or requirements (e.g. pot limits and pot tag attachment) is perceived as unclear or confusing.	Produce clearer written guidance, including visual examples.
	General consultation on the permit is perceived to occur too late.	Communicate proposed changes earlier and provide transition support.
	There are inconsistencies with byelaw requirements (e.g. certificate disc).	<i>No solution identified.</i>

Permit costs

Fishers generally accept the need for regulation, but permit costs are widely experienced as an additional and increasingly burdensome pressure within a sector already facing rising operational expenses and uncertain returns. While some fishers

¹³ Permit costs for commercial fishers are £200 every two years. Recreational fishing permit costs are £10 per year with a potential £5 additional administration fee.

acknowledge that permit fees are modest in isolation, others emphasise that these fixed costs accumulate alongside; licences, gear, fuel, and maintenance; all of which are particularly prevalent in low-margin fisheries.

A central concern is that permit costs are perceived as duplicative, particularly when fishers already hold MMO licences for the same activity. Some who raised this issue also question why an additional fee is required when the benefits of the permit system are not clearly visible. This is said to weaken confidence that permit income is contributing meaningfully to improved enforcement, stock protection, or management outcomes.

Uniform permit pricing is also widely viewed as disproportionately impacting small-scale and seasonal operators who highlight that the cost is more burdensome to them than it is to larger, higher-intensity businesses. Paying a fixed fee regardless of fishing intensity is seen by some fishers as unfair and as favouring those with greater capacity to absorb costs.

Fishers do not generally call for permit costs to be removed but instead propose reforms to improve proportionality. Suggested approaches include linking fees to fishing effort or gear levels e.g. in relation to number of pot tags, introducing tiered or seasonal permits, and providing clearer justification for how permit fees are used by the IFCA. Overall, permit costs function as a focal point for concerns about fairness, transparency, and cumulative regulatory pressure rather than opposition to regulation itself.

Permit numbers

Fishers express concern that current permit arrangements do not meaningfully limit participation or overall fishing pressure. While permits require formal registration, they are widely perceived as failing to control the number of operators or the cumulative level of effort within the fishery, particularly in certain areas. As a result, the system is often described as maintaining effective open access rather than functioning as a substantive management control.

An issue highlighted is the ability for individual businesses to hold permits across multiple vessels. This is seen as allowing effort to concentrate among a small number of well-resourced operators, which fishers view as unfair and disadvantageous to smaller, independent boats reliant on local grounds. The perception of excessive permit numbers in specific areas¹⁴ is also linked to greater crowding, reduced scope for informal ground rotation, and rising competition for space.

¹⁴ Concerns about excessive permit numbers were raised in five interviews, all of which involved fishers operating in ICES sub-squares 30E9 West and 30E9 East and primarily targeting whelk.

Concerns were also raised in one interview about **recreational gear contributing to conflict**, particularly where there is no clear structure or guidance on where recreational pots should be placed. The presence of recreational fishing in this case is seen as increasing congestion in already pressured areas.

Some fishers express concern that unrestricted permit numbers reduce opportunities for fishing grounds to recover, contributing to continuous pressure on stocks. In this context, permit numbers are seen as undermining the effectiveness of other management measures, such as pot limits, by allowing high cumulative effort even where individual vessels remain within permitted levels.

The solutions proposed in this section simply call for a limitation in permit numbers, whether that is limited access to large businesses, limits to recreational permits or overall limits across the district.

Permit communication

Fishers raise a small number of specific concerns about how permit requirements are communicated, focusing primarily on clarity rather than opposition to the permit itself. One issue highlighted is confusion arising from the phrasing of aspects of the byelaw, with pot limit wording cited as an example where rules are not immediately clear and seem open to interpretation. This is seen as creating uncertainty rather than deliberate noncompliance.

Fishers also express a perception that consultation and communication tend to occur too late, limiting opportunities to understand changes in advance or to adjust practices accordingly. While not widely discussed across interviews, this contributes to frustration where changes affect existing fishing arrangements or large financial investments.

In addition, it was identified that there is a need for clearer and more accessible supporting guidance, particularly for practical documents such as a pot tag guidance. Simple, visual guidance is seen as a way to reduce confusion and improve consistency in how rules are interpreted and followed.

Overall, permit communication is not described as a major failing of the byelaw, but as an area where clearer wording and more practical guidance could improve understanding and support compliance.

Recreational fishing perspective

Table 5: Summary of prevailing recreational views, concerns, and proposed solutions related to the permit system, as well as the number of interviews that mention the viewpoint (out of the 3 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Permit costs [1/3]	Recreational permit costs are considered reasonable by some recreational fishers.	<i>No solution identified.</i>
Permit numbers [0/3]	<i>No comments identified.</i>	<i>No solution identified.</i>
Permit communication [2/3]	Recreational fishers expressed concern about how they can clearly identify their permit to the public.	Re-introduce permit stickers for recreational boats.
	Recreational fishers report low confidence in understanding permit rules and requirements.	Improve dissemination of permit information and consider dissemination through angling shops.
	Recreational fishers report difficulty in accessing clear information about Marine Protected Areas and associated restrictions.	Provide clearer identification and explanation of protected areas.

Recreational fishers' views on permits broadly align with commercial concerns about clarity and accessibility of information, rather than opposition to regulation itself. Participants report uncertainty about where to find clear guidance on permit conditions and spatial restrictions, particularly in relation to protected areas, and they also suggest that clearer, more accessible communication would reduce confusion.

Recreational fishers generally consider permit costs to be reasonable and did not raise any concerns about the number of permits issued, diverging from commercial perspectives where cumulative effort is a more prominent issue. Their focus instead is on understanding how rules apply in practice and being confident that they are compliant.

Gear marking

Interviewees expressed a range of views relating to gear marking. These are grouped into three sub-themes: pot tags, tag replacement, and surface markers.

Table 6: Summary of prevailing commercial views, concerns, and proposed solutions related to gear marking, as well as the number of interviews that mention each subtheme (out of the 26 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Pot tags [11/26]	Pot tags are perceived as restrictive for fishers working both inside and outside 6nm, as frequent gear movement makes rotational practices difficult.	<i>No solution identified.</i>
	Pot tags are experienced as a financial and time burden for fishers.	<i>No solution identified.</i>
	A single-colour pot tag system for 0–3NM and 3–6NM is perceived to make the 300-pot limit from 0–3NM difficult to enforce.	Introduce a two-colour pot tag system to differentiate between 0–3NM and 3–6NM.
Tag replacement [8/26]	Loss of a small number of pot tags requires replacement of the full set, resulting in additional cost and time.	Introduce a second colour for replacement tags.
	Replacement tags are perceived to be fished alongside original tags, making it difficult to detect noncompliance and excess tag / pot use.	Introduce tags with unique codes or identifiers to allow checks on validity.
	The pot tags replacement cycle of two years, despite tags remaining functional, is perceived as frustrating.	Extend tag and/or permit duration. Use more durable, reusable, or recyclable tag materials (e.g. metal tags or return-and-reissue schemes).
Surface markers [6/26]	Large surface markers are perceived as impractical in high-tidal or exposed locations and may cause gear damage.	Flexibility with surface marking in areas with strong tides.
	Noncompliant surface tag behaviours (e.g. unmarked cans) are perceived to go unpunished, while minor issues (e.g. faded writing on buoys) are enforced.	Greater enforcement and compliance checks. More consistent and proportionate enforcement.

Pot tags

Commercial fishers generally accept pot tags as a legitimate requirement for identifying gear and signalling participation in a regulated fishery. Tags are seen as useful for establishing ownership and, to some extent, discouraging uncontrolled entry. However, support for the principle of pot tagging is tempered by concerns raised across interviews about how the measure operates in practice. One issue raised is that tagging can be restrictive for fishers operating **both inside and outside 6NM**, where gear is moved regularly and rotational practices depend on flexibility. In this context, tagging requirements are described as creating constraints that do not always align with how fishing is practically carried out.

Fishers also raise concerns that a **single tag colour** for pots used across different zones weakens the enforceability of inshore limits, particularly where compliance relies on clear, visual distinction. A proposed solution is a **two-coloured tag system** to differentiate between pots fished 0–3NM and 3–6NM. However, this is also recognised as potentially restrictive for fishers who genuinely work across both zones and move gear frequently, suggesting any change would need to balance clarity with operational flexibility.

Finally, fishers question the effectiveness of pot tags as an effort-control mechanism. While tags identify permitted gear, they are not perceived as reliably limiting the number of pots fished, because checking pot limits would require IFCA enforcement officers to haul all pots associated with an individual permit simultaneously, which is not practical and they are therefore unable to monitor whether tag limits are exceeded across the district. Several fishers suggest that this creates opportunities for exploitation.

Tag replacement

Commercial fishers describe tag replacement requirements as a disproportionate source of cost, time, and frustration. A key issue is that where a small number of tags are lost, fishers may need to replace a full set, creating significant expense and administrative burden. Concerns are also raised that replacement tags can be **fished alongside original tags**, and that it is difficult for enforcement to detect when fishers are effectively using too many tags, weakening confidence in the measure.

Replacement cycles are also criticised where tags must be replaced every two years despite remaining functional. Fishers raise concerns about the **waste generated**, particularly the environmental impact of discarding durable plastic tags prematurely.

Rather than rejecting replacement controls entirely, fishers propose practical refinements. Suggested solutions include introducing a **second colour for replacement tags**, using **tags with codes or unique IDs** so validity can be checked

(e.g., in-date vs expired), extending **tag/permit duration**, and exploring **more durable, reusable, or recyclable materials** (including return-and-reissue schemes).

Surface markers

Commercial fishers broadly accept the requirement to mark gear at the surface and recognise its role in identifying ownership and reducing conflict. However, concerns are raised about how surface marking requirements operate in practice.

A key issue is **practicality in high-tidal or exposed locations**. Fishers working in areas with strong tides or winter weather describe large surface markers as creating excessive drag, increasing the risk of gear being displaced, damaged, or lost. In these contexts, rigid requirements for highly visible markers are viewed as incompatible with safe and effective fishing, rather than as a conservation concern.

Concerns are also raised about **uneven compliance and enforcement**. Fishers report that some vessels do not comply with surface marking requirements at all (e.g. unmarked cans or missing identifiers), while others are penalised for relatively minor issues such as faded writing. This perceived imbalance undermines confidence in the measure and contributes to frustration among compliant fishers.

Proposed solutions include **greater flexibility in surface marking requirements in high-tidal areas**, alongside **more consistent and proportionate enforcement** that prioritises clear noncompliance over minor or unintentional noncompliance.

Recreational fishing perspective

Table 7: Summary of prevailing recreational views, concerns, and proposed solutions related to gear marking, as well as the number of interviews that mention the viewpoint (out of the 3 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Pot tags [1/3]	A recreational fisher commented that pot tags legitimise fishing activity and clearly identify gear as part of an authorised fishery.	N/A.
Tag replacement [0/3]	<i>No comments identified.</i>	<i>No solution identified.</i>
Surface markers [1/3]	Recreational fishers report that surface markings deteriorate during the season and are difficult to re-mark mid-season.	Apply proportionate enforcement recognising wear and tear on surface markings.

Recreational fishers note that **wear and tear on surface markings is inevitable** over the course of a season due to weather, abrasion, and regular hauling. It is highlighted that maintaining markings in perfect condition over a full season is seen as unrealistic, particularly for smaller, recreational operations with limited capacity to regularly re-

mark gear. These fishers noted this should be taken into consideration by enforcement officers. However, one recreational fisher also highlights that pot tags help legitimise their fishing activity by clearly identifying gear as part of an authorised fishery.

Gear restrictions

Interviewees expressed a range of views relating to gear restrictions. These are grouped into two sub-themes: pot limits, and escape gaps and riddles.

Table 8: Summary of prevailing commercial views, concerns, and proposed solutions related to gear restrictions, as well as the number of interviews that mention each subtheme (out of the 26 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Pot limits ¹⁵ [21/26]	Many fishers expressed positive views about the current pot limit for commercial and recreational fishermen and felt it was an appropriate measure to limit effort.	N/A.
	Some fishers expressed concern that pot limits are unenforceable in practice.	<i>No solution identified.</i>
	Some fishers expressed concern about the long-term sustainability of stocks due to cumulative effort.	Reduce pot limits or number of issued permits. Limit parlour pots in favour of inkwell pots.
	Some fishers expressed concern that pot limits do not account for differences in pot size and design, meaning fishing capacity (and pressure) can increase while maintaining pot numbers.	Consider technical measures to define/standardise pot types. Consider technical measures to restrict pot size/design.
	Fishers report that increased effort is required to maintain catches, leading to larger areas of ground being worked.	<i>No solution identified.</i>
Escape gaps and riddles ¹⁶ [11/26]	Fishers expressed positive views about escape gaps and riddles as a conservation measure.	N/A.
	Noncompliance due to different riddle sizes inside and outside 6NM is perceived as widespread.	<i>No solution identified.</i>
	Reduced visibility of undersized catch has altered fishers' perceptions of stock health.	Increase stock assessments and share data on juvenile abundance.
	Some fishers expressed concern that escape gaps and riddles can cause injury or mortality (e.g. damaged claws, trapped individuals)	<i>No solution identified.</i>

¹⁵ Current commercial fishing pot limit for crab/lobster and whelk is 600 total pots, with there being 300 pots at 0-3NM and 300 pots at 3-6NM. The limit for cuttlefish is 300 traps total.

¹⁶ Within the Sussex IFCA District, the Shellfish Permit Byelaw requires the use of escape gaps in crab and lobster pots, and escape holes and riddles in whelk pots.

Pot limits

Commercial fishers generally express **positive views about the current pot limit**, with many describing it as appropriate for both commercial and recreational fishing. Existing limits are widely seen as workable and as providing a clear boundary on effort, helping to prevent unrestricted expansion of gear. For many participants, the current pot limit is not viewed as a constraint on their ability to operate.

Alongside this support, some fishers raise concerns about **enforceability in practice**. These concerns focus on the difficulty of verifying how many pots are deployed at sea, leading to scepticism about how consistently limits can be checked. Fishers also note that the allowance of separate pot limits inside 3NM and 3-6NM is difficult to enforce, with concerns that some operators may be exploiting this by concentrating their full allocation inside 3NM. In addition, a small subset of fishers suggest that pot limits do not account for differences in pot size or design, meaning that fishing capacity can increase without exceeding permitted pot numbers.

A smaller number of fishers express concern about the **long-term sustainability of stocks**, particularly in the context of overall fishing pressure. In this context, reducing pot limits is suggested as a potential precautionary measure to support stock recovery. Related to this, some fishers proposed limiting the use of **parlour pots in favour of inkwell pots**, which are perceived as less intensive. However, these suggestions are not widely shared and are framed as longer-term sustainability considerations rather than immediate management priorities.

Fishers also report that **greater effort is required to maintain catches**, resulting in larger areas of ground being worked, and worked more regularly. This observation is noted as a change in fishing practice rather than as a direct criticism of current pot limits.

Escape gaps and riddles

Commercial fishers largely describe escape gaps and riddles as **working well and delivering clear benefits**. Many speak positively about escape gaps and the 25 mm riddle, noting that these measures are effective and that undersized shellfish are no longer being caught in significant numbers.

Alongside this support, however, fishers raise concerns about **noncompliance**, particularly in relation to escape gap and riddle sizes. There is frustration that some vessels are not adhering to the required specifications, which undermines fairness and confidence in the measure. This concern is heightened by the use of different riddle sizes inside and outside 6 nautical miles, which fishers believe allows some operators to take advantage of the rules. Moreover, escape gaps and riddles have also influenced perceptions of the fishery, with one fisher indicating that seeing fewer undersized

individuals when sorting catch has altered how they judge stock health and future prospects, noting that seeing undersized individuals was a positive sign for the future.

Practical issues with **escape gap materials (plastic)** are also highlighted. Fishers report that current materials are easily broken, requiring frequent replacement. Concerns are additionally raised about escape gaps and riddles causing injury or mortality to individuals, including damage to claws or non-target species getting trapped.

Suggested solutions include **using more durable materials** for escape gaps (e.g. metal), **requiring vessels fishing inside 6 nautical miles to carry only the 25 mm riddle**, and improving enforcement to address noncompliance. Some fishers also suggest that Sussex IFCA could undertake more stock assessment work and share information on juvenile shellfish numbers to support understanding of the benefits of these measures.

Recreational fishing perspective

Table 9: Summary of prevailing recreational views, concerns, and proposed solutions related to gear restrictions, as well as the number of interviews that mention the viewpoint (out of the 3 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Pot limits [2/3]	Recreational pot limits were perceived by some recreational fishers as too low to be viable.	Increase recreational pot limit (e.g. to 10 pots) while maintaining catch limits.
	Recreational fishers raised the need for flexibility to lift pots in practical or emergency situations.	Introduce greater flexibility in rules for emergency or practical circumstances.
Escape gaps and riddles [1/3]	Fishers expressed positive views about escape gaps as a conservation measure.	N/A.

Recreational fishers raise a limited number of practical points relating to pot limits and gear use, focusing on **viability and flexibility** rather than opposition to regulation. In one interview, it is suggested that the current 5 pot limit makes recreational potting less viable, with a proposal to increase the limit to **10 pots** while retaining existing catch limits.

A distinct issue relates to **flexibility in practical or emergency situations**. Participants describe circumstances where weather or equipment problems may require another recreational fisher to lift pots to prevent loss. This is framed as protecting gear rather than increasing catch, with a suggestion that limited, agreed flexibility on pot limits for these emergency situations would better support real-world conditions. It is noted in conversation by the fishers proposing this that they understand the possible enforcement complexities of this suggestion.

Monthly catch returns

Interviewees expressed a range of views relating to monthly catch returns. These are grouped into two sub-themes: administrative burden, and data quality and accuracy.

Table 10: Summary of prevailing commercial views, concerns, and proposed solutions related to monthly catch returns, as well as the number of interviews that mention each subtheme (out of the 26 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Administrative burden [12/26]	Monthly returns are seen to add to the administrative burden of fishers.	Share and streamline data collections between IFCA, MMO, and markets to reduce manual collation. Develop a digital reporting tool (app) similar to the MMO app which fishers are already familiar with.
	Monthly returns are seen to duplicate data collected by MMO and via markets.	Integrate IFCA reporting requirements into existing MMO systems or apps.
	Monthly returns are required even when vessels are not fishing or have no gear deployed.	<i>No solution identified.</i>
Data quality and accuracy [5/26]	Monthly catch returns rely on self-reported data, the submission of which may be inconsistently interpreted across fishers leading to questions about the accuracy and reliability of data collected.	Conduct targeted audits (spot checks and inspections) to verify catch return data. Engage with fishers to clarify interpretation of return questions. Improve guidance and question design to increase accurate reporting. More frequent reporting (although this raises concerns about increased admin burden). Include soak time in reporting to get a clearer picture of effort.

Administrative burden

Fishers consistently describe monthly catch returns as contributing to an **administrative burden**, particularly when combined with other reporting and regulatory requirements. A key frustration is the perception that IFCA returns **duplicate data already provided** through MMO reporting systems and market sales notes, requiring fishers to collate and submit similar information multiple times.

This duplication is seen as inefficient and unnecessary, increasing workload without clear added benefit. The requirement to submit monthly returns even when vessels are **not fishing or have no gear deployed** is also highlighted as adding to administrative effort, though no clear solution was identified by participants.

Fishers propose several ways to reduce this burden, primarily through **streamlining and integration**. Suggested solutions include sharing data between IFCA, MMO, and markets to reduce manual collation, integrating IFCA reporting requirements into existing MMO systems or apps, and developing a **digital reporting tool** aligned with platforms fishers already use.

Data quality and accuracy

Commercial fishers raise concerns about the **quality and reliability of data** generated through monthly catch returns. A central issue is that returns rely on **self-reported information**, which fishers note can be interpreted differently by different individuals. This inconsistency leads to questions about how accurate and comparable the resulting data are, particularly when used to inform management decisions.

Fishers also highlight that current catch return formats may not always capture fishing activity in a way that reflects actual effort. In this context, some suggest that data collected through monthly returns may provide an incomplete or misleading picture if interpretations vary or key aspects of fishing activity are not adequately recorded.

Rather than opposing data collection, fishers identify a number of ways to improve accuracy. Suggested solutions include **targeted audits or spot checks** to verify submitted data, **direct engagement with fishers** to clarify how questions are interpreted, and **improved guidance and question design** to prompt more consistent reporting. One fisher also suggested that the return form could be updated to including **soak time** which could help provide a clearer indication of effort. With these suggestions, fishers acknowledge that more frequent reporting could increase administrative burden.

Recreational fishing perspective

Table 11: Summary of prevailing recreational views, concerns, and proposed solutions related to monthly catch returns, as well as the number of interviews that mention each subtheme (out of the 3 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Administrative burden [0/3]	No comments identified.	No solution identified.

Data quality and accuracy [1/3]	Recreational fishers struggle to complete weight-based returns due to not weighing catch.	Introduce a separate recreational reporting format based on numbers caught, retained, and released.
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Recreational fishers raise a specific concern about **data quality and reporting requirements**, noting difficulties with completing **weight-based catch returns**. As recreational catches are not routinely weighed, participants describe this requirement as impractical and poorly aligned with how recreational fishing is carried out.

To address this, recreational fishers suggest introducing a **separate reporting format** tailored to recreational activity, based on the number of shellfish caught, retained, and released. No comments are identified from recreational fishers regarding the administrative burden of reporting, and no additional solutions are proposed.

Catch rules

Interviewees expressed a range of views relating to catch rules. These are grouped into three sub-themes: berried hens and v-notching, quota, and seasonal restrictions and closed areas.

Table 12: Summary of prevailing commercial views, concerns, and proposed solutions related to catch rules, as well as the number of interviews that mention each subtheme (out of the 26 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Berried hens and v-notching ¹⁷ [9/26]	Fishers expressed positive views about the berried hen ban and v-notching as a conservation measure.	N/A.
	Concerns were raised about the enforceability and level of compliance around the landing of berried hens.	Consider a ban on the landing of crippled lobsters, as an alternative, which have lower commercial value and is enforceable.
	Concern was expressed that the berried hen ban may be affecting the gender balance of lobster stocks.	No solution identified.
Closed areas and seasonal restrictions [5/26]	Concerns were raised about stock condition and levels of effort in specific areas.	Introduce seasonal closed areas (e.g. close areas for whelk fishing between October and January). Limit vessel capacity allowed to operate in specific areas.
Quota [2/26]	Fishers expressed concern about the long-term sustainability of stocks.	Introduce quota, particularly for larger vessels and within the whelk fishery.
	Fishers expressed concern about limited opportunities for diversification.	Retain non-quota status.

Berried hens and v-notching

Fishers generally express **strong support** for the protection of berried hens and view the ban on landing berried lobsters as an important and effective conservation measure. Many regard it as a well-established rule that contributes to the long-term sustainability of lobster stocks. One fisher also commented on v-notching as a positive tool for protecting breeding stock.

Alongside this support, fishers raise concerns about **enforceability and compliance**. Some express scepticism that the berried hen ban is consistently adhered to, particularly in areas where enforcement is limited. This creates frustration among compliant fishers and raises doubts about whether the conservation benefits are being fully realised.

¹⁷ The landing of v-notched, mutilated, or berried lobsters is not permitted within the district.

One fisher also raised concern about whether the berried hen ban may have **unintended effects on the gender balance** of lobster stocks. While this concern is not widely shared, it introduces some uncertainty about longer-term biological outcomes.

In response to enforcement concerns, one participant suggests that banning the landing of **crippled lobsters** could provide a more enforceable alternative, which would be easier to regulate and focuses on returning individuals that have a lower market value. Overall, berried hen protection is viewed as a positive management measure, with concerns focused on compliance and enforceability rather than the measure itself.

Closed areas & seasonal restrictions

Commercial fishers raise a limited set of points in relation to closed areas and seasonal restrictions. Concerns about **future stock sustainability** underpin most comments in this area. Some fishers express particular concern about stock condition on specific grounds e.g. high concentrations of berried hens at Bognor Rocks; a well-known local site. In this context, seasonal closures are suggested as a precautionary measure to protect stocks during sensitive periods. Proposed closures are framed as temporary and targeted, rather than permanent exclusions. Additionally, vessel capacity restrictions in some areas are proposed as a possible solution to limiting effort around sensitive areas.

Fishers also raise concerns about the **future of the whelk fishery**, with some suggesting that continued year-round fishing pressure, both inside and outside 6NM, risks undermining stock sustainability. Seasonal closures are therefore proposed as a way to reduce pressure and allow stocks to recover.

Although the byelaw itself does not specify closed areas or seasonal limits, it was highlighted that **restrictions introduced through other byelaws are already affecting fishing activity** linked to this permit. This creates a perception of cumulative constraint, where the combined effect of multiple measures reduces available grounds, even when no explicit restriction exists within this byelaw.

Quota

Some fishers raise concerns about the **long-term sustainability of shellfish stocks**, particularly in relation to increasing pressure within certain fisheries. Some fishers suggest that introducing quota, particularly for larger vessels and within the whelk fishery, could help reduce pressure on stocks.

At the same time, a fisher expressed specific caution about the possible implications of introducing a quota on cuttlefish. There is concern that this could restrict opportunities

to switch between fisheries or adapt to changing conditions, particularly in areas where diversification opportunities are limited.

As a result, views on quota are mixed. While quota is seen as a way to address sustainability concerns in high-pressure fisheries, others emphasise the importance of retaining a **non-quota system** to preserve flexibility and resilience. Overall, quota is discussed as a potential future option rather than a preferred or widely supported solution, with fishers weighing stock protection against the risk of reduced adaptability.

Recreational fishing perspective

Table 13: Summary of prevailing recreational views, concerns, and proposed solutions related to catch rules, as well as the number of interviews that mention each subtheme (out of the 3 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Berried hens and v-notching [1/3]	Fishers expressed positive views about the berried hen ban as a conservation measure.	N/A
Closed areas and seasonal restrictions [0/3]	<i>No comments identified.</i>	<i>No solution identified.</i>
Quota [0/3]	<i>No comments identified.</i>	<i>No solution identified.</i>

Recreational fishers express **positive views** about the ban on landing berried hens, describing it as an appropriate and effective conservation measure. No concerns or alternative approaches are raised in relation to this measure.

No comments are identified from recreational fishers regarding quota, closed areas, or seasonal restrictions.

Enforcement and relationships

Interviewees expressed a range of views relating to enforcement and relationship building. These are grouped into two sub-themes: enforcement approach and relationships.

Table 14: Summary of prevailing commercial views, concerns, and proposed solutions related to enforcement and relationships, as well as the number of interviews that mention each subtheme (out of the 26 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Enforcement approach [10/26]	Noncompliance within the district is perceived not to be effectively managed.	Use monthly catch return data and vessel effort to highlight potential noncompliant activities and guide inspections. Increase enforcement activity across the district. Apply penalties that are sufficient to deter noncompliance.
	The current enforcement vessel is perceived as insufficiently discreet, and as unable to access certain grounds or handle large volumes of pots, limiting effective checks.	Use alternative or additional enforcement vessels (e.g. smaller or less conspicuous vessels).
	Fishers value an IFCA presence and boardings, although there are concerns that the current level is insufficient and unevenly distributed across the district.	Increase IFCA presence and frequency of boardings.
	Reports of noncompliance are perceived not to be consistently followed up.	Improve intelligence gathering and follow-up on reported issues.
	Some officers are perceived to lack practical fishing experience and knowledge to enforce rules effectively.	Include fishers within IFCA roles or advisory positions. Increase opportunities for IFCA staff to gain practical experience, including spending time at sea with fishing vessels.
	There are concerns pot inspections (for cuttlefish in particular) is disruptive and impacts the success of a pot.	<i>No solution identified.</i>
Relationships [7/26]	Fishers commented that they have experienced confrontational interactions, including with enforcement officers, and prefer officers to be approachable, understanding, and proportionate.	Continue and promote approachable officer engagement. Maintain proportionate, pragmatic enforcement.

		Prioritise advice and informal resolution where appropriate.
	Some fishers felt that the IFCA could be a more supportive body.	Develop a more supportive and promotional role, including assistance with diversification. Engage with industry bodies to maximise knowledge exchange (e.g. shellfish associations).
	Fishers report difficulty accessing information or contacting officers, discouraging engagement.	Provide clearer communication channels. Improve phone availability and face-to-face engagement. Offer alternatives to online-only information.
	Fishers value collaborative interactions and feel frustrated when feedback on raised concerns is lacking.	Increase two-way engagement. Provide feedback on issues raised by fishers.
	Limited use of local ecological knowledge is perceived to affect fisheries data collection and survey design.	Incorporate fishers' local knowledge and ensure meaningful consultation.

Enforcement approach

Fishers consistently express concern that **noncompliance within the district is not being effectively managed**. While rules are generally accepted in principle, many participants perceive that noncompliance is insufficiently detected or addressed, undermining confidence in the regulatory system and disadvantaging compliant operators.

A recurring issue relates to **enforcement capacity and coverage**. Fishers value an IFCA presence and boardings but widely feel that current enforcement activity is too limited and unevenly distributed across the district, with some fishers who operate far below pot limits stating that inspections are too frequent and are disruptive to their catch (cuttlefish pots in particular). The existing enforcement vessel is also perceived as restricting effectiveness, as it is viewed as highly visible, unable to access certain grounds, and impractical for checking large volumes of pots. These limitations are seen as reducing both deterrence and the ability to verify compliance.

Concerns are also raised about the **follow-up of reported noncompliance**. Some fishers feel that intelligence provided to IFCA is not consistently acted upon, which weakens trust in reporting mechanisms and discourages future cooperation.

In response, fishers suggest several improvements focused on strengthening deterrence and targeting effort. Proposed solutions include using **catch return data and vessel effort information** to identify potential noncompliance and guide inspections, increasing enforcement activity across the district, and applying **penalties that are sufficient to deter rule breaking**. Some also suggest deploying **alternative or additional enforcement vessels**, such as smaller or less conspicuous crafts, to improve access and effectiveness.

Finally, a small number of fishers express concern that some officers lack sufficient practical fishing knowledge to enforce rules effectively. In response, some suggest greater involvement of fishers within IFCA processes and increased opportunities for IFCA staff to gain practical experience, including spending time at sea on working fishing vessels and learning from fishers.

Relationships

Fishers place strong emphasis on the **quality of relationships with Sussex IFCA officers**, viewing these interactions as central to trust, compliance, and effective management. Several participants describe experiences of **confrontational enforcement**, and contrast these with a clear preference for officers who are approachable, understanding, and proportionate in their interactions. Where engagement is perceived as pragmatic and respectful, fishers report greater willingness to cooperate and comply.

Some fishers also express a desire for IFCA to adopt a more **supportive role**, beyond enforcement alone. This includes acting as a source of advocacy, advice and assistance, for example in relation to diversification opportunities, and engaging more actively with industry bodies such as shellfish associations to strengthen knowledge exchange.

Difficulties in **accessing information or contacting officers** are raised as a barrier to engagement. Fishers report that limited phone availability, reliance on online communication, and reduced face-to-face contact discourage dialogue and reduce opportunities to resolve issues informally.

Fishers also highlight that they value **collaborative interactions**, particularly where concerns or observations are acknowledged and acted upon. Related to this, some fishers feel that limited use of **local ecological knowledge from fishers** affects fisheries data collection and survey design by fisheries organisations, and that greater incorporation of fishers' knowledge would improve both evidence and relationships.

Suggested improvements focus on maintaining approachable enforcement styles, strengthening two-way communication, improving accessibility of officers, and ensuring that engagement and consultation lead to visible feedback and outcomes.

Recreational fishing perspective

Table 15: Summary of prevailing recreational views, concerns, and proposed solutions related to enforcement and relationships, as well as the number of interviews that mention each subtheme (out of the 3 total).

Subtheme	Prevailing view / concern	Participant-identified solution(s)
Enforcement approach [2/3]	There are concerns that noncompliance in the district is not being effectively managed.	Increase enforcement activity across the district.
	A recreational fisher reported that they were happy with how pot inspections were conducted.	N/A
	A recreational fisher raised concerns about free divers removing catch from recreational pots.	Increase enforcement activity across the district.
Relationships [1/3]	Recreational fishers report limited face-to-face engagement with IFCA staff.	<i>No solution identified.</i>

Recreational fishers express concerns that **noncompliance within the district is not being effectively managed**, echoing views raised by commercial fishers. In particular, participants raised concerns about **freedivers removing catch from recreational pots**, which is seen as difficult to monitor and enforce currently. In response, recreational fishers identify **increased enforcement activity across the district** as the primary solution, with an emphasis on greater visibility and deterrence rather than changes to rules themselves.

Recreational fishers also report **limited face-to-face engagement with IFCA staff**, which they feel reduces opportunities to build understanding and trust. No specific solutions are proposed to address this issue, but the concern highlights a perceived gap in direct interaction between recreational fishers and IFCA. Recreational fishers also report being **content with how inspections are carried out**, with no concerns raised about enforcement approach or conduct.

Summary

Across RQ2, fishers' views show that acceptance of the byelaw is shaped less by opposition to regulation itself and more by how **specific measures operate together in practice**. Many fishers support individual rules, such as pot limits, escape gaps, riddles, and protection of berried hens, and often describe these as sensible or effective in principle. However, confidence in these measures is undermined where **enforcement is perceived as inconsistent**, where rules are difficult to interpret or apply, or where compliant fishers feel disadvantaged.

A recurring issue is that **measures which appear robust on paper are open to noncompliance**. For example, fishers note that pot limits are widely accepted to monitor effort, yet their effectiveness is questioned in areas where high permit numbers concentrate effort or where pot limits are difficult to enforce or monitor at sea. Similarly, riddles are strongly supported, but confidence is reduced where some operators are perceived to use riddles with different size specifications without consequence, for example riddles that should only be used outside 6NM. In these cases, frustration is not with the rule itself, but with uneven compliance and enforcement.

Concerns about **cumulative burden** cut across permits, gear marking, and reporting. Permit costs, pot tags, surface marking, and monthly catch returns are described as manageable in isolation, but together contribute to a sense of increasing administrative and financial pressure. This is amplified where fishers struggle to see how reporting data is used, or where minor infractions (such as faded markings) appear to attract attention while more substantive noncompliance persists within the district.

Enforcement and relationships underpin all other themes. Fishers consistently link trust in management to visible, proportionate enforcement and approachable engagement. Where IFCA presence is limited, follow-up is unclear, or interactions feel confrontational, confidence drops in the wider system, even for measures that are otherwise supported. Alongside enforcement, some fishers suggest that IFCA could play a more supportive role, including advocating for the inshore fleet and engaging with other organisations or research bodies to support knowledge exchange.

Aside from commercial perspectives, recreational fishers generally express support for conservation measures and share concerns about fairness where noncompliance undermines confidence in management. Compared with commercial perspectives, their responses place greater emphasis on **clarity, accessibility, and practical flexibility** in permit conditions, reporting, and day-to-day compliance, rather than on cumulative effort or economic pressure. Overall, recreational perspectives highlight the importance of rules that are understandable, workable at low intensity, and consistently applied.

Overall, RQ2 shows that management measures are most likely to be accepted where they are clear, enforceable, and applied fairly and proportionately, and where fishers feel the system of measures operates as a joined-up framework rather than a collection of disconnected regulations.

RQ3 - Managing crab and lobster fisheries

Context

Interviewees identified a range of perceived factors contributing to crab stock decline. These are grouped into three sub-themes: fishing activity, non-fishing activity, and environmental factors.

Table 16: Summary of commercial fisher-identified factors contributing to crab stock decline

Subtheme	Participant identified drivers of decline
Fishing activity	• Fishing activity outside of the Sussex IFCA District • Technology advancements (e.g. use of parlour pots) • Fishing activity impacting ground (e.g. scallop dredging) • Unsustainable levels of fishing effort • Landing of soft crab
Non-fishing activity	• Capital, maintenance and aggregate dredging (e.g. Portsmouth harbour, Shingle Bank, and Brighton Marina) • Pollution • Subsea cables
Environmental factors	• Changing crab migration patterns • Octopus bloom • Climate change / sea temperature rise • Increase in black spot disease (predominately in brown crab)

Fishing activity

Some participants note fishing activity **outside the Sussex IFCA District** as a contributing factor affecting stocks that migrate across management boundaries. Others refer to periods of **increased fishing effort**, including temporary changes in activity levels linked to market conditions (e.g. crab price increase during COVID-19).

A small number of fishers raise more specific observations. These include concerns about the landing of **soft crab**, which is highlighted as being wasteful and interrupting breeding cycles. Additionally, some isolated comments suggested that differences in gear efficiency may influence catch outcomes, specifically the increase in efficiency from introducing parlour pots. These points are not widely shared and are presented as individual observations rather than community-wide concerns.

Non-fishing activity

Fishers frequently point to **non-fishing activities** as important drivers of crab decline. Capital, maintenance and aggregate dredging is a prominent concern, with participants describing changes to seabed conditions and sediment movement that they believe affect crab movement or habitat, particularly in specific areas referenced in table 15.

Pollution and water quality are also raised, including concerns about discharges and historical contamination. These impacts are described as cumulative and long-term, with fishers expressing uncertainty about their full effects but viewing them as significant pressures on shellfish habitats.

In addition, fishers mention **offshore infrastructure**, such as subsea cables associated with wind farms or interconnectors, suggesting these may influence crab behaviour or distribution. Across these comments, non-fishing activities are consistently framed as external pressures that are difficult to observe directly but are perceived to play a substantial role in shaping stock availability.

Environmental factors

Participants report changes in **seasonal timing and movement patterns of crabs**, including variations in when and where crabs are encountered. Climate change and **rising sea temperatures** are mentioned as possible contributors to altered behaviour and migration patterns. Some fishers also raise concerns about increased disease, including black spot in crabs, as well as the recent octopus bloom, which is perceived to be impacting crab stocks. Overall, environmental factors are framed as complex, variable, and beyond local control.

Solutions

Interviewees proposed several solutions to address the decline of crab stocks. These are grouped into three sub-themes: fishing activity, data and enforcement, and beyond IFCA remit.

Table 17: Summary of commercial fisher-identified solutions proposed in interviews to address crab stock decline

Subtheme	Participant-identified solution(s)
Fishing activity	• Target fishing to areas where lobsters are more prominent • Employ bait which is favoured by target species • Introduce quota • Ban / phase out parlour pots in favour of inkwell pots • Greater coordination between IFCA, MMO, and neighbouring districts to align inshore and offshore management measures.
Data and enforcement	• Increase data collection to evidence reasons for decline • Educate IFCA officers on how to identify hard or soft crab
Beyond IFCA remit	• Restrict capital, maintenance, or aggregate dredging • Ensure accountability for historical and current impacts

Fishing activity

Fishers highlight a small set of practical changes aimed at reducing pressure on crab stocks through adjustments in fishing practice. One suggestion is to be **more selective about fishing sites**, including targeting areas where lobsters are expected rather than crabs, as a way to reduce crab catches and associated pressure. Another proposes more operational changes, such as using **different bait choices** (e.g., fresh skate) to better “coax” crabs where crab fishing is intended.

A couple of solutions raised by fishers incorporate broader controls on fishing activity. These include introducing **quota** and, separately, **banning or phasing out parlour pots** in favour of inkwell pots, although the complexities involved with implementing such a transition to inkwell pots was noted.

In addition, one fisher emphasises that inshore management measures are unlikely to be effective in isolation and calls for greater coordination between IFCA, the MMO, and neighbouring districts. From this perspective, aligning inshore and offshore management measures is viewed as necessary to address pressures on stocks that move across management boundaries.

Data and enforcement

Several participants emphasise that **more data is needed**. This is framed as a prerequisite for understanding what is driving changes in crab and lobster availability and for distinguishing between competing explanations. The emphasis is therefore on

strengthening the information available for management, rather than proposing specific regulatory changes.

One practical suggestion, framed as a conservation measure, is to **educate IFCA officers on identifying soft- versus hard-shelled crab**, reflecting a perception and concern that enforcement or interpretation may be hindered by limited familiarity with the distinction. It was also recognised in the interview that this distinction is still subjective, even amongst experienced fishers.

Beyond IFCA remit

Some fishers express the view that key routes to change lie **beyond IFCA's remit**, particularly in relation to non-fishing pressures. In this context, suggestions focus on activities such as capital, maintenance and aggregate dredging, including the idea of allowing **a season without these activities** and seeking **accountability for historical and on-going dredging impacts**. These points are framed as requiring action by other bodies or wider regulatory processes, rather than adjustments to local fisheries rules.

Recreational fishing solutions

Table 18: Summary of recreational fisher-identified solutions proposed in interviews to address crab stock decline

Subtheme	Participant-identified solution(s)
Fishing activity	• Fishery closures or restrictions to allow stock recovery • Increase crab landing size to 150mm • Update recreational catch limit to 2 crabs • Improve marketability of spider crab
Data and enforcement	• <i>No solutions identified</i>
Beyond IFCA remit	• <i>No solutions identified</i>

Recreational fishers identify a small number of specific solutions focused on reducing pressure on crab stocks. One participant suggested **giving the crab fishery a rest for a few years**, although this idea is not expanded on or discussed in detail.

More concrete proposals relate to **tightening catch controls**. These include increasing the **minimum landing size for crab to 150 mm** and reducing the **recreational catch limit to two crabs**, both framed as ways to limit removals and support stock sustainability.

In addition, one recreational fisher proposes improving the **public promotion of spider crabs**, suggesting that greater awareness or acceptance of this species could influence consumer demand and alleviate pressure on brown crab.

Summary

Across RQ3, fishers consistently describe the decline in crab stocks as the result of **multiple interacting factors**, rather than a single identifiable cause. While fishing activity is acknowledged as part of the picture, fishers rarely frame it as the sole or dominant driver for crab stock decline.

Non-fishing activities are frequently raised as significant influences on crab availability, particularly where fishers perceive changes to seabed conditions, water quality, or habitat. These pressures are often described as operating beyond the scope of local fisheries management, contributing to a sense that management responses focused solely on fishing controls may be insufficient to address observed declines.

Environmental change further complicates fishers' interpretations. Shifts in migration patterns, distribution, and disease occurrence are cited, with fishers emphasising that these factors are difficult to predict or manage.

Fishers raise a limited set of **potential responses**, reflecting the complexity of the issue. These include suggestions to reduce fishing pressure through measures such as temporary reductions in activity, targeted effort on ground where lobster is more prominent, adjustments to catch limits or size limits, and greater precaution in what is landed. Other suggestions focus on improving understanding through better data and monitoring, or on addressing non-fishing pressures outside Sussex IFCA's remit. These proposals are typically framed as exploratory or precautionary rather than as clearly defined solutions.

Overall, RQ3 shows that fishers view crab decline as a multifaceted issue, with proposed responses shaped by uncertainty and an awareness of the limits of local management.

Closing Remarks

Overall, the interviews give a rare, detailed insight into the realities of life as a shellfish fisher in the Sussex IFCA District, prioritising fishers' views, concerns, and hopes for the future of their fishery from the outset of the byelaw review process. Across research questions, fishers consistently emphasise the importance of having confidence in a management system that is fair, clear, and consistently applied, with reasoned rationale and effect.

The findings highlight that a number of existing measures are perceived as working well and attract broad support, including conservation measures such as the protection of berried female lobsters. At the same time, the report identifies areas where management is experienced as burdensome, unclear, or unfair in practice. These include cumulative regulatory and administrative pressures, perceived inequities in permit allocation and costs, and frustration where noncompliance is seen to persist alongside limited or inconsistent enforcement.

Importantly, fishers' concerns are rarely framed as opposition to regulation itself. Rather, they focus on how measures operate together on the ground, how enforceable they are in practice, and whether they are applied proportionately and consistently. Where problems are identified, fishers tend to propose refinements and improvements, rather than removal of existing measures.

This report constitutes a qualitative evidence base, grounded in fishers' lived experience and perceptions of management systems. It does not seek to assess biological stock status or enforcement effectiveness directly, but instead provides insight into how management arrangements are understood and experienced by those most directly affected. As such, it offers valuable context to sit alongside scientific, compliance, and monitoring evidence in the byelaw review process.

Taken together, the findings underline that supporting livelihoods and wellbeing is closely linked to trust in management, constructive relationships with regulators, and the perceived fairness and practicality of regulatory measures. The report is intended to inform reflective discussion within Sussex IFCA, in the context of the byelaw review, highlighting where existing approaches appear to be working as intended, and where implementation challenges or unintended effects may warrant further consideration.

Suggested next steps could include comparative learning with other IFCAs and fisheries to explore how similar challenges have been addressed elsewhere, and further examination of the workability of participant-identified solutions where these have been trialled in other contexts. Such learning could support future consultation and decision-making by Sussex IFCA as it considers the ongoing review of the byelaw.