

Marine Conservation and Enforcement Team
Marine Management Organisation
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Thursday October 1st 2015

Sussex IFCA Marine Protected Area Byelaw and associated
Kingmere Regulatory Notice

Dear Marine Conservation and Enforcement Team,

The following comments are submitted on behalf of the Angling Trust in its role as the national representative body for all angling in England through which we represent the interests of individual members, member clubs, charter skipper and angling trade members throughout Sussex.

The Angling Trust's Sussex Marine Region, which has been heavily involved in the discussions around the management of the Kingmere MCZ, will be responding separately.

The Angling Trust supported the designation of the first tranche of Marine Conservation Zones back in 2013 despite the lack of detail provided at that time about what the likely management measures would be and how recreational angling might therefore be affected.

The Angling Trust is committed to achieving a number of objectives detailed in the [National Angling Strategy](#) – our five year strategy for angling supported by Defra and funded by both the Environment Agency and Sport England. These objectives include opening up community waters which, in the case of sea angling, includes maintaining and extending access for recreational sea angling.

At a local level we have been campaigning for black bream, one of the key features for which the Kingmere MCZ was designated to protect, to be recognised for its importance as a recreational species and for its value as one of Sussex's most iconic marine natural assets.

While we believe spatial management of black bream can provide conservation benefits, because of the lifecycle of the species, we will continue to campaign for better management of the fishery as a whole and not just within the limited confines of the Kingmere MCZ.

Comments relating To The Sussex IFCA MPA Bylaw

Interpretation:

1. a)

It is not clear whether the definition of angling confines it to recreational angling. Sections g) and h) define fishing and fishing gear but no mention is made of angling (the use of rod, line and hook) for the removal of sea fisheries resources for commercial purposes. Can the IFCA clarify how commercial hook and line fisheries are interpreted?

5. a)

Can the IFCA clarify how recreational angling gear may be stowed in a way that, should it be carried through a management area in which, or during which time, angling is prohibited, the vessel or persons may be confident that they will not be in contravention of the Regulatory Notice?

10.

We request that where a Regulatory Notice is issued varied or revoked efforts are made to publish details in local angling specific media in order to inform the recreational angling sector as thoroughly as possible. The Angling Trust is willing to help do this through our databases and communications department.

Comments relating to the Kingmere Regulatory Notice

‘Angling’ management measures:

- a) Due to its very low use by recreational anglers, the proportion of known nesting areas within the site (33%) and the benefit of having a control area against which to measure the effectiveness of the three other sites, we feel that a prohibition on angling in zone 1 is proportionate in relation to the angling management measures as a whole.
- b) Whilst our own extensive local consultation with anglers identified a five bream per day bag limit as being acceptable we can accept that four bream per angler, per day, represents the majority of recreational anglers with the opportunity to retain a reasonable number of fish for personal consumption whilst reducing overall fishing mortality of spawning bream and contributing towards the objective of recovering the status of spawning black bream within the site.

However, we believe the proposal for a year-round bag limit does go beyond the conservation advice by restricting angling outside of the defined spawning and nesting period (April – June). Whilst we understand the rationale for proposing this we consider it we would like to see this as part of a wider management plan for black bream which includes annual catch limits and perhaps a Minimum Conservation Reference Size for all sectors exploiting the fishery; Failing that, other technical conservation measures, as appropriate.

‘Towed Gear’ management measures:

5.

a)

(ii) We understand the SxIFCA’s argument for justifying a year round bag limit on recreational catches – which is that it is not unreasonable for those fishing within an MCZ to acknowledge that they are fishing within a site of conservation importance by contributing to lowering their impact on the features designated for protection outside of the spawning period. In addition we accept that black bream may display high site fidelity and that reducing fishing mortality outside of the spawning period may therefore contribute to the increasing the population returning to nest and spawn within the MCZ. However, if this is to be achieved stakeholders must believe that the measures they are being asked to adhere to are balanced, equitable, proportionate and contributing to the conservation objectives of the site.

In this instance we believe the conservation contribution made by anglers through a four fish bag limit outside the spawning period, from 1st July to 31st March, could be mitigated many times over by the proposed management measures that allow towed gear in zone 3 of the site in the same period.

Evidence provided in the impact assessment estimates the total removal of bream from the Kingmere by recreational anglers to be 5.8t (based on very limited data and a number of assumptions made) compared to total commercial landings onto Sussex ports per annum of approximately 130t. The Marine Management Organisation’s **provisional reported landings for May 2015** show 55t of bream were landed into Shoreham from January – May 2015. Although not a direct comparison, it is clear that the major contributor of fishing mortality and decrease in spawning stock biomass comes from commercial fisheries. Some of these, in particular teams of pair trawlers, have a very significant impact on spawning black bream while at the same time producing a low quality product and delivering very little economic benefit to local coastal communities in Sussex. The MMO UK Sea fisheries statistics for 2015 show that 44t of bream were landed into UK ports by vessels over 10m in length, dwarfing the 5.8t estimated to be removed by recreational anglers whose economic spend goes into directly supporting jobs and businesses in coastal communities across Sussex.

We believe that the IFCA will struggle to get buy in for the proposed management measures when the conservation contribution of ‘catch and release’ of bream from recreational anglers could be undermined by landings from towed gears from bream in zone 3 entering or exiting the nesting sites within the MCZ.

We therefore recommend, in order to further the conservation objectives of the site and compliment the contribution being made by the recreational angling sector through a year round bag limit and voluntary code of conduct, that towed gear is also prohibited year round within zone 3.

In addition to the management measures detailed in the regulatory notice we are aware that the SxIFCA wishes to develop a code of conduct for recreational angling within the site. Having previously developed a crowdsourced code of conduct for bream fishing on the Kingmere we support this proposal. However, it does constitute a further voluntary conservation measure by recreational anglers which will contribute to furthering the conservation objectives of the MCZ. We believe it will be more difficult to achieve compliance with the voluntary code while the conservation benefits of it may be undermined by permitting towed gears in zone 3 from July to May.

Enforcement and compliance

While the zoned approach to managing the site has no doubt involved significant negotiations on how to balance the needs of stakeholders against the conservation objectives of the site it does present a significant challenge to ensure that compliance is achieved within the constraints of the enforcement capabilities of the SxIFCA. There may be a role for anglers to support the IFCA by providing intelligence on which compliance and enforcement action can be based. The Angling Trust would be interested to discuss with the SxIFCA and MMO how this might be explored further.

Review of regulatory notice

We believe that it is crucial that data is collected from all fisheries operating within the MCZ in order to establish a robust evidence base of their impacts on the site as well as the effectiveness of the management measures. The evidence provided by natural England acknowledges the evidence of the impact of recreational angling on spawning black bream is very limited. Various assumptions are therefore made using evidence from other species/fisheries which have been better studied. This includes freshwater species/fisheries which may display very different characteristics as a result of recreational fishing pressure. As a result no clear conclusions can be drawn on the extent of the impact of recreational angling on nesting/spawning black bream.

Accurate catch data at site level must be recorded in order to better understand the impact on both the site and on stakeholders which will in turn help to achieve more effective and targeted management measures that still allow levels of sustainable fishing to occur within the site. The Angling Trust would be prepared to work with the SxIFCA on how better data from recreational fishing could be recorded on condition that our concerns over towed gear access to zone 3 are addressed and that, should towed gears be permitted to operate within the MCZ, catch data of black bream from these vessels be accurately recorded in order to assess the full impact towed gear targeting bream entering or exiting their nesting sites.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Mitchell', with a stylized, cursive script.

David Mitchell
Marine Campaigns Manager
Angling Trust

Cc: Tim Dapling, Chief Fisheries and Conservation Officer, Sussex IFCA