



## Angling Trust | Save Our Sea Bass Bass Position Statement 2018

### Background

Up until the 1980s, sea bass (*Dicentrarchus labrax*) – which are present in the central and southern North Sea, Irish Sea, English Channel, Bristol Channel and Celtic Sea – were prized mainly by members of the public fishing recreationally by rod and line (henceforth referred to as ‘anglers’ or ‘the public’) and were subject to very little commercial exploitation. Since then, a retail market for bass developed, quota for other fish reduced, and commercial fishermen predictably responded by over-fishing the bass stock.

Organisations like the Angling Trust, and the Bass Anglers’ Sportfishing Society (BASS) have been campaigning for the introduction of bass conservation measures for more than 20 years. But fishery managers and fisheries ministers made little attempt to control and protect the fishery, despite repeated warnings from scientists and conservation bodies (see below). The current dramatic decline was inevitable and entirely avoidable.

Excerpt from “The BASS” Laboratory Leaflet No.59, 1987, Ministry of Agriculture, Fisheries and Food:

Since the mid-1970s, the bass has become one of the main target species for the inshore commercial fishery in southern Britain. Strong home and continental markets have ensured that high prices – comparable with those of other prime fish such as salmon, turbot and sole – are paid for bass, and pressure on the stocks has become intense. Renewed calls for a halt to the apparent decline of the British bass population resulted in MAFF’s decision to increase the MLS to 32 cm\* in May 1981 and to initiate an investigation of the bass fishery in England and Wales and of the species’ biology, in order to provide the scientific basis for further management measures should they be considered necessary. This leaflet presents the results of this work and discusses how the bass fishery could be managed to safeguard the stocks and provide a high, sustainable yield. Where relevant information is available in scientific papers, these are referred to in the text.

### **Our bass stock is in real trouble**

The bass stock is crashing. It was nearly 19,000 tonnes in 2010, but the forecast for 2018 is just 6,414 tonnes, a fall of two thirds. The stock is now well below the critical level of 8,075 tonnes (Blim), which means the future regeneration of the stock is now critically endangered and the stock may remain depleted for extended periods.

Scientific advice issued by the International Council for the Exploration of the Seas (ICES) in June 2013 recommended a 36% cut in fishing mortality (F) across the Northern EU area for 2014. This was ignored and in 2014 bass landings by UK vessels actually rose by 30% (from 772 tonnes to 1,004 tonnes). In 2014, ICES recommended a cut of 80% for 2015.

Recreational angling bodies are not in the least surprised that ICES is once again recommending a total moratorium in 2018. For several years we have warned EU fisheries ministers that unless they radically reduce the commercial catch limits in line with the scientific advice, the ICES recommendations would get ever more draconian.

### **Gill netting**

There is no doubt that inshore gill netting has played a significant part in the decline of bass stocks. For example, in 2014, UK gill netters alone landed 584 tonnes of bass – more than the 541 tonnes that ICES recommended as the total for the entire Northern EU bass fishery in 2016.

The “unavoidable by-catch” allowance for fixed netters has been a disastrous failure. It is impossible to prove that a fisherman is targeting bass. Fixed netters know this and so many have been illegally targeting bass secure in the knowledge that they cannot be prosecuted. UK Inshore Fisheries Conservation Authorities are admitting that they do not have the legal powers to enforce the fixed netting laws and the MMO are telling fixed netters that it is legal to net reefs where bass is the target species. As a result, in the UK, the restrictions on fixed netting have failed to deliver the necessary reductions in bass mortality as they were intended when agreed by the Council of Ministers.

### **The public – the biggest stakeholder in the bass fishery**

Sea bass are an iconic sporting species, a top target for the 8.7 million sea anglers whose total economic activity across Europe is estimated to add €10.5bn the European economy. A report published in 2017 for the European Parliament’s PECH Committee on the value and impact on fish stocks of marine recreational fishing estimates it creates almost 100,000 jobs across Europe and that, “If this (marine recreational fishing) was a single company, it would be in the top 10 in Europe, in terms of number of employees, and the top 100 in the world.”

The U.K. recreational bass fishery alone is estimated by Defra to be worth £200 million a year. The imminent collapse in the bass stock, or a further reduction in the ability of the public to take a bass for the table, would be disastrous for the economy and many coastal communities.

Sea Angling 2012, the study of Recreational Sea Angling in England carried out by CEFAS for Defra, shows:

- There are 884,000 sea anglers in England who directly pump £1.23 billion p.a. into the economy (£2.1 billion including induced and indirect impacts).
- 10,400 full time jobs are dependent on sea angling (23,600 jobs including induced and indirect impacts).

In 2014 a study carried out by MRAG on behalf of the Blue Marine Foundation concluded that, per tonne of bass removed, the economic output of bass angling was estimated to be 40 times higher than for commercial fisheries. To put it in context, the VAT alone which is collected from sea anglers dwarfs the entire value of all commercial fish landings in England.

### **Fishing Opportunities for 2017**

In December 2016, at the meeting to set 'Fishing Opportunities' for 2017, the EU Commission tabled proposals calling for a complete end to commercial netting for bass, which had the wholehearted support of angling organisations and conservation bodies. Fishery ministers agreed to restrict targeted bass fishing to commercial hook and line and public access only, but they recklessly agreed three loopholes for commercial fisheries:

- Fixed netters were given an “unavoidable by-catch” allowance of 250kg per month. We warned the UK Government before it was agreed that it was transparently a targeting allowance dressed up as a by-catch allowance and we would ensure that the public was made fully aware of this.
- The percentage by-catch allowance for bottom trawlers and seine netters was increased from 1% to 3% of catch, despite there being no evidence to support this.
- Commercial hook & liners were given an annual allowance of 10 tonnes. But in 2016, not one hook & liner in the UK landed more than 9 tonnes and 91% of them landed 1 tonne or less! In 2017, UK hook & line bass landings have actually increased.

Anglers accepted the same severe fishing rules with only catch and release up to the end of June and one fish a day per angler from July to the end of the year. A proposed monthly bag limit for anglers was rejected, meaning that anglers were once again disproportionately affected, despite having a lower impact on stocks than commercial fishing and delivering the greatest socio-economic benefits from the fishery.

### ICES Advice - October 2017

Unsurprisingly, given the failure to bring commercial catches down to sustainable levels, ICES has advised that, when the precautionary approach is applied, there should be zero catch for both commercial and recreational sectors in 2018. This would mean that commercial fishermen could only legally land bass within their by-catch allowance and members of the public angling would be restricted to catch and release only and not be able to take a bass for the table.

The full ICES advice for 2018 can be viewed here:

<http://ices.dk/sites/pub/Publication%20Reports/Advice/2017/2017/bss.27.4bc7ad-h.pdf>

### What we would like to see for 2018

Bass anglers have been writing to the EU Commission with three key demands:

1. A restriction of 3% of catch per trip for fixed netters, as already applies to demersal trawlers and seiners – a law that could be easily understood and enforced.
2. Cut commercial hook & line vessels to 1.0 tonne of bass per annum.
3. Extend the six-month moratorium on anglers to apply to all forms of commercial bass fishing. Bass spawn between January and June and the fishery will not recover unless we protect these spawning fish. A complete moratorium on landings (both targeted and bycatch) for six months will reduce mortality significantly, since there will be no economic incentive for commercial fishermen to target bass in this period. **It is simply unacceptable for commercial fishing opportunities to be open during this period while anglers right to retain fish is restricted.**
4. Fishing opportunities (the ability to retain bass for personal consumption) are maintained in 2018 for public access to publicly-owned bass stocks.

### What we oppose for 2018

We are aware that the UK may propose another loophole for commercial fixed netters: a percentage of monthly total catch by-catch allowance, instead of the 3% of catch per trip restriction that applies to demersal trawlers and seine netters. As we have explained to Defra: there is no evidence to support the need for this allowance; it is completely unworkable since it requires fishermen to be able to forecast their catch a month ahead; it is unenforceable since the MMO do not know how much bass an under 10 metre vessel lands each month; and it represents an outrageous ten-fold increase over a 3% of catch per trip proposal.

## Following the ICES advice

On behalf of the millions of EU anglers, we make the following observations:

- Members of the public who wish to fish for bass have been very heavily restricted - a six-month moratorium and a one fish bag limit – while some commercial fisheries have avoided any restrictions. Yet angling by the public is the most sustainable form of fishing and delivers the highest socio-economic benefits.
- ICES estimates that 97% of bass caught by anglers in the UK are released, demonstrating the severe impact the restrictions are already having on the public.
- A 97% UK release rate shows that anglers are respecting the restrictions and have already contributed about as much as possible to reducing their impact.
- Estimates as to the impact of ‘recreational’ fishing on bass stocks in recent years have varied from 10% to 25% of all landings. In December 2016, Cefas advised Defra that the public access to bass was responsible for mortality of just 230 – 560 tonnes.
- ICES advice on seabass in 2014 highlighted that landings from UK under 10m fleets could be up to three times higher than the official landings data. This needs to be taken into account by ICES when advising on which measures would deliver the biggest reductions in mortality.
- The ICES advice currently fails to take into account discards from commercial fisheries, thus understating commercial fishing mortality.
- The public expects a level playing field and wants no more politically-motivated derogations and exemptions for commercial fishing interests.
- We applaud the excellent work that ICES are doing, but we are deeply puzzled that ‘recreational’ fisheries in 2014 were responsible for taking 1,132 tonnes of bass, but in 2016 was responsible for 1,627 tonnes after two years of restrictions which included a six-month moratorium, very restrictive bag limits and an increase in the Minimum Conservation Reference Size (resulting in fewer bass being retained). **This simply defies all logic and we have suggested that ICES should revisit their methodology.**
- There is a lack of clarity around the ICES advice on the post release mortality (PRM) assessments for recreational angling and no evidence of a similar exercise being done for commercial hook and line fisheries.
- The overwhelming majority of bass (85% or more) released by anglers survive and contribute to rebuilding the stock. Both the Angling Trust and BASS will continue to promote best angling practice to reduce the already low rates of post release mortality
- More recent evidence suggests the rate of post release mortality could be as low as 5% yet this has not been included in the ICES advice.
- Experience shows us that there is little chance of fisheries ministers approving the total moratorium recommended by ICES.

## European Commission Proposals

The Commission's proposals were published in draft on 16th November as follows:

### Commercial Sector

- A reduction from 10 to 4 tonnes for eligible hook and line vessels (with Feb/Mar closure)
- No netting for bass and no more by-catch arrangements for trawl or fixed nets.

### Recreational sector

- No retention of bass all year
- In first 6 months, no fishing for bass at all
- In latter 6 months catch and release only.

### **We urge the EU Commission to target a minimum 5% growth in the bass stock in 2018 by:**

- Removing the unavoidable by-catch loophole for fixed netting which facilitated illegal targeted fishing.
- Reducing the commercial hook and line allowance to 1.0 tonne per annum – so that they can contribute proportionately to reducing fishing mortality.
- Extending the six month moratorium to apply to commercial bass fishing
- Accepting that there can be no justification, as we have demonstrated, for increasing the already severe restrictions on anglers who have already borne a disproportionate burden of restrictions.

## Conclusions

The Angling Trust and Save our Sea Bass want to see EU Fisheries Ministers:

- Firmly reject, at European Union Fisheries Council meeting, proposals by the EU Commission which seek to restrict angler's historic rights to the public Bass fishery whilst allowing commercial exploitation to continue.
- Make clear that this measure is unfair, disproportionate and completely unenforceable. It would 'criminalise' thousands of anglers whose activities have had the lowest impact on European Bass stocks.
- Protect the jobs and businesses in the angling trade and tourism sectors which would be jeopardised by preventing anglers from spending money on fishing.
- Insist that there can be no justification for increasing the already severe restrictions on anglers who have borne a disproportionate burden of recent restrictions.
- Continue to rebuild Bass stocks by limiting their commercial exploitation by restricting bass fishing to sustainable hook and line fishing only.