



Marine
Management
Organisation

Channel Demersal Non-Quota Species Fisheries Management Plan:

Feedback from February and March 2023 stakeholder engagement

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Background

Now that the UK has left the European Union, we have the opportunity to manage our fisheries in a way that best meets the needs of stocks, the marine environment, and the people whose livelihoods depend on them. Fisheries Management Plans (FMPs) are one way in which we can achieve our ambition for sustainable fisheries.

There are 43 proposed FMPs across the UK. The Department for Environment, Food and Rural Affairs (Defra) is responsible for preparing and publishing FMPs in English waters. Defra and delivery partners will prepare the plans with stakeholders across the sector. The drafts will then go to consultation before being published and implemented. The Marine Management Organisation (MMO) is the delivery partner leading on stakeholder engagement and drafting of the demersal non-quota species (NQS) FMP in the English Channel. The Channel demersal NQS FMP will include ICES divisions 7d and 7e and will cover demersal species red, tub and grey gurnards, cuttlefish, squid, octopus, john dory, surmullet, lesser spotted dogfish, brill, turbot, lemon sole, bib and Smooth hound.

Following on from our, MMO carried out a second round of in person engagement events on England's south coast with stakeholders from the commercial and recreational fishing sectors and other interested stakeholders. We held a combination of drop-in sessions and quayside visits at several locations across the south coast. We were able to speak with many stakeholders over a two-week period to gather a wide range of views and feedback on the Channel demersal NQS FMP. In addition to the in-person events, we also held four online events, with one specific to recreational anglers. Our online events had over 30 attendees. The information gathered during this stakeholder engagement will allow MMO to focus on what needs to be considered in the final FMP draft. The feedback within this document represents the key themes that were picked up during our engagement sessions in February and March 2023. Where appropriate, we will endeavour to take on board all the feedback that we collected during our visit to the south coast, this first iteration of the FMP cannot aim to address everything that has been raised.

This document covers the views of a wide range of stakeholders across the south coast. The views expressed in this document are not MMO's opinion. These are fisher's and wider stakeholders' opinions which we would like to share for transparency and to encourage further discussion.

Summary of 7e stakeholder engagement

Engagement in ICES area 7e ran for one week from 6 to 9 March. Sessions were held in Plymouth, Brixham, Newlyn, Truro, Mevagissey, Exmouth, Axmouth, Lyme Regis, Looe, Fowey, Weymouth and Falmouth. The FMP Team spoke to over 30 individuals from the commercial and recreational fishing sectors and other interested stakeholders. Feedback is summarised below.

Species

Commercial fishers' feedback:

- All species listed in the FMP are important and valuable to industry. It was highlighted that there has been a decline in all species within the FMP.
- Turbot, brill and squid were highlighted by some stakeholders as having healthy stocks. Whereas others raised concerns over the increase in netting causing a decline in the turbot population and that the increase in bluefin tuna has led to a decline in squid.
- Squid are an important summer hand lining fishery.
- Protecting squid, cuttlefish and octopus will be difficult due to the short cyclical life spans.
- Mullet, john dory, and gurnard numbers are reported to be decreasing due to fly seining activity however, some report seeing more john dory.
- Research is needed to identify the issue behind declining lemon sole catches.
- Cuttlefish is an important fishery in the Channel, especially in the eastern Channel. There are large annual variations in catches and more work needs to be done on Catch per unit effort (CPUE) to accurately assess stocks. It was also highlighted that the cuttlefish trap fishery has a short season, and fish are trapped after breeding which is the stage of natural mortality and is sustainable. A review of the trap fishery was highlighted as a need for the FMP.
- Stakeholders reported a large increase in the Mediterranean octopus population and are concerned that octopus are feeding on dogfish eggs, lobsters and crabs caught in pots. Stakeholders highlighted that the Spanish octopus fishery is Marine Stewardship Council accredited and that this example could be used in the UK to manage the octopus sustainably.
- Smooth hound and lesser spotted dogfish are an important bycatch species and a source of pot bait for the whelk fishery. It has been reported that landings and sizes have declined. There are concerns that there will be an increase in smooth hound landings due to the recent allocation of spurdog quota.

Recreational fishers' feedback:

- Squid, cuttlefish, grey, red and tub gurnard are important species for recreational anglers.
- Grey gurnards are increasing in volume and size.
- Concerns that large amounts of cuttlefish are being removed by EU vessels working between the 6 nautical mile (nm) and 12nm limit.
- Stakeholders raised concerns over the decline in the squid population due to the increase in bluefin tuna.
- It was highlighted that the increase in octopus is an opportunity to develop a new recreational fishery and the spear fishing sector.
- Red mullet has become a rare summer fishery.
- There are increasing john dory catches from the boat angling sector being reported.
- Lesser spotted dogfish and lemon sole have declined. The lemon sole season used to be from January to February, but recreational anglers report not seeing it in the same volumes and quality anymore.
- Starry smooth hound is an emerging sport fishery.

Management Measures

Commercial fishers' feedback:

- Need to understand how management will work with diminished fish stocks. Fishers need support to maintain a fishery for the future along with a need to look at effort and other market drivers –this needs to be broken down by species level.
- Minimum Conservation Reference Size (MCRS) for lemon sole, turbot, brill, john dory and red mullet that aligns with the local Inshore Fisheries and Conservation Authorities (IFCAs) is required.
- MCRS for cuttlefish may be more difficult to implement. It is felt by stakeholders that more data is needed regarding cuttlefish and squid before any management measures for those species are introduced. Size limit restrictions are not as effective at controlling effort as the undersized fish will be discarded.
- Standardise mesh size for all vessels to 100mm. This will need to apply to UK and EU vessels (beamers, otter trawls and fly seiners). Take an incremental approach to increasing gear size gradually to not put fishers out of business.
- New trawl configurations were suggested. Shorter trawls increase survivability and allow fish to be returned to the sea alive. Increase the cod end mesh size incrementally to 100mm for all towed gear. There would be a short-term reduction of catch quantity and squid landings, but it will reduce small sized catch, dog fish landings, fly seining activity and the need to introduce minimum conservation reference size (MCRS) for some species.
- Engine power restrictions on mobile gear.
- It was highlighted that the current quota system is not working due to exhausted quota putting more pressure on other species and preventing diversification.
- Suggestion to introduce a fishing exclusion zone around shipwrecks.
- Suggestion to introduce a 30% of bycatch limit for smooth hound.
- Displacement from Marine Protected Areas (MPAs) needs to be monitored. Highly Protected Marine Areas (HPMAs) will not be effective as commercial fishing is too efficient. Instead, much larger offshore no take zones should be implemented.
- It was highlighted by some stakeholders that legislation/management measures need to be reviewed on a more regular basis to reflect what is happening on the ground. However, other stakeholders did note that being too reactive could be detrimental to the stocks/fisheries.
- Closed seasons should be in place for spawning fish. However, real time closures should be in consultation with fishers and any voluntary closures should be made statutory.
- Compensation should be provided for days at sea not fished. This would enable recovery of stocks in an effort-based regime which limited fishing days.
- Look at restrictions to push the larger and less sustainable fishing methods beyond the 12 nm line and limit offshore effort as it leads to a decline in inshore stocks. For example, introducing engine power restrictions for a maximum 250 horsepower (HP) as a management measure to restrict access inside the 6nm limit.
- It was noted that the under 10-metre fleet require flexibility because they have limited fishing effort and should be exempt from certain restrictions to ensure they can make a living.
- There is a requirement to utilise all catch and not discard at sea. There could be a minimal and reserve price for landing excess fish.

Recreational fishers' feedback:

- Introduce a MCRS for turbot, dogfish, and brill along with maximum size and bag limit for recreational anglers to protect a stock.
- Spear fishing should be commercialised.
- Educational resources should be made available to help recreational anglers avoid landing juvenile fish.
- Management needs to be agile, adaptive, flexible, and reactive.

Engagement

Commercial fishers' feedback:

- Some stakeholders would prefer one-to-one engagement both in person and via email as they find it hard to engage in online meetings.
- Fishers want to see FMP meeting notes, timelines, data and feedback published and shared, especially around the time of the public consultation.
- Boat yards are a good place for publicising future engagement events.
- In the future, there should be a paid representative for the commercial fishers at meetings.
- It was noted that future engagement events should include North Devon and North Cornwall.

Recreational fishers' feedback:

- Local recreational fishing competitions would be a good place to engage with the recreational anglers.
- Recreational anglers want meeting notes, presentations and stakeholder engagement feedback published.
- Need to build links and trust between recreational fishers, the commercial sector, and the fisheries authorities. It would be good to make funding available to put people in place to represent the recreational anglers to enable better communication.
- Angling shops and websites can assist with sharing messages and future publications.
- It is felt that the recreational anglers need further engagement, proportionate representation and to feel valued and included.
- Face-to-face engagement in the evenings is preferred for future engagement events and a single point of contact provided for the recreational fleet to contact MMO.
- It is felt that Regional Fisheries Group meetings are not open enough to recreational fishers.
- Recreational anglers highlighted that The Angling Trust does not represent all sea anglers but can be a useful contact.

Summary of 7d stakeholder engagement

Engagement in ICES area 7d ran for one week from 20 to 23 of February and sessions were held in Poole, Rye, Hastings, Portsmouth, Arundel, Eastbourne, Selsey, Shoreham, Brighton, Hove, Gosport and Newhaven. The FMP Team spoke to over 60 individuals from the commercial and recreational fishing sectors. Feedback is summarised below.

Species

Commercial fishers feedback:

- Most of the species included in the FMP are important and profitable bycatch.
- Lemon sole, plaice, red mullet, and john dory catches are in decline. Some fishers believe the decline is due to the fly seining in the English Channel and others believe that the fishing effort for those species has declined.
- Cuttlefish landings have declined since 2018, it was noted that last year, 2022, was a very bad year. It is believed that the stocks are being targeted and overfished by the offshore fleet. The fishery is an important spring and early summer fishery to the inshore fleet and gives the opportunity to fish when quota species are limited. The offshore cuttlefish tend to aggregate with bass, and it is difficult to manage the 5% bass trawling rule when aiming to catch cuttlefish.
- Smooth hound and dogfish are abundant. However, lesser spotted dogfish seen have reduced in size.
- There is concern that small sized red mullet landings have increased.
- A decline in the average size of red gurnards landed over the last three years has been observed.
- Larger vessels have been targeting squid and consequently the inshore squid fishery has collapsed. Others thought that squid was starting to be seen in greater quantities and there were good size squid in 80mm cod ends.
- Bib and tub gurnard were harder to sell during the pandemic. Effort went into other species which could be processed and frozen.
- Smooth hound became worthless during covid, very cyclic fishery; has been good and bad years. Damage from the fish to set gill nets decreased due to new mesh size regulation. Smooth hound landing decreased after pair trawling ban was introduced.

Recreational fishers' feedback:

- Turbot, red and tub gurnard are important species for boat anglers.
- Lesser spotted dogfish are not worth protecting. The recreational fishers do not target lesser spotted dogfish unless fishing in competitions.
- The recreational fleet observed that cuttlefish landings were affected by the pandemic – sales were difficult due to most of the landings being exported to Spain and Italy, the prices fell as well as the amount landed.
- Squid is a new and growing target for recreational anglers both from the shore and boat.
- From a recreational shore perspective, smooth hounds are the main species targeted, along with a few red mullet and gurnards. Concern that numbers of smooth hound caught from the beach are falling in comparison to numbers caught in the immediate aftermath of Covid restrictions.
- Since pair trawlers were pushed out of Sussex IFCA district due to the byelaw and with Kingsmere MPA restrictions there has been an increase in the inshore cuttlefish population.

Management Measures

Commercial fishers' feedback:

- MCRS is needed for lemon sole, turbot and brill. However, MCRS for cuttlefish will not be effective until survivability studies have been conducted.
- Stakeholders highlighted the need for joined up management between the IFCA and MMO. The FMP needs to be agile and encompass management measured from both authorities in real time.
- Management needs to be less restrictive and allow fishers to diversify.
- Stakeholders highlighted the difference between the inshore and offshore fleets and want them to be managed differently. Additional management measures should not reduce inshore opportunities as they are vulnerable to other factors such as the weather. There needs to be wider government support with clear goals for future inshore fisheries.
- Enforcement directed against the EU vessels needs to be made more effective for management to work. It was commented that different regulations for EU vessels would be ideal and the introduction of Remote Electronic Monitoring (REM) on board their vessels.
- Subsidies would be needed if there is a call to reduce overall fishing effort.
- It was suggested the derogation of 40mm cod end for catching squid should be removed for fly seiners.
- It was highlighted that the placement of the square mesh panel is important and there is a need to increase mesh to 90mm for both dogfish and bass.
- There is a need to define what is meant by 'targeted' fishery as some say they are targeting sole but catch mainly cuttlefish. This needs to be understood to be able to manage stocks sustainably.
- Historic right/track record to allow fishing management measures does not allow inshore fishers to diversify year on year. If going to use track record management measures, it needs to be longer than 3 years, up to 10 years to show the stocks change.
- It was noted that there is a concern regarding the permit schemes, as they don't limit the fleet as anyone can have one.
- Need to create a more standardised approach to net compliance through a more cohesive approach with the MMO, fishers, and net manufacturers working together towards better compliance.
- NQS stocks should be protected from becoming quota species as they are a gateway into the industry for new fishers who can't access quota – it's very expensive/difficult to get hold of.

Recreational fishers' feedback:

- Could introduce rod license to fund the collection of accurate data and funding for protection measures such as needing a licence to buy bait which could help record recreational fishery activity and help prevent small fish being caught.
- More guidance on good handling practice could help to maximise survivability for recreational catches.

- The introduction of protected areas for the recreational and sustainable inshore sector and certain fisheries was highlighted as a potential management measure. Introducing a no fishing zone would adversely impact the charter companies.
- Need to capture data on what the recreational fleet are catching as well as landing.
- Need maximum size as well as MCRS to protect breeding stock.
- Concern over illegal commercial anglers – catching large quantities of fish and selling them to local places - further education is needed for commercial shore fishers.
- There is a lot of confusion on the ground about what management is applicable for boat and beach anglers.
- Need clarity and for anglers to support measures - all new measures should start with an educational period; anglers will need to see evidence that existing management measures are working.
- Concerns that significant setting of static nets very close to the shoreline is preventing fish getting through to beach anglers – seen a significant decline in catches from the beach.

Engagement

Commercial fishers' feedback:

- Engaging with stakeholders in North Devon and Scotland was suggested.
- Stakeholders highlighted the need for a FMP summary document that is easy to read that highlights the key areas of the FMP.
- A map with all the MPAs, FMPs and Offshore Wind Farms (OWF) overlaid would be helpful and illustrate spatial squeeze.
- Texts and emails were the preferred methods of contact for many stakeholders.
- Stakeholders raised concerns over the volume of engagement required from different organisations currently. Fishing will always be prioritised.
- Engagement sessions should be shared with other maritime organisations.
- Engagement and trust would be improved if data was shared with fishers.
- Need to understand the demographic of those that are contributing to consultations and give weighting to responses so that full time and part time fishers are equally represented.
- There was an “inshore fisheries conference” held before the pandemic and that would be an ideal forum for gathering more data about the fisheries and sharing future FMP news.

Recreational fishers' feedback:

- Recreational anglers suggested the MMO use the Angling Trust more to circulate messages regarding the FMP and upcoming events. This includes getting messages out in magazines such as “Sea Angling” and “Saltwater Boat Angling”.
- Also suggested working with the Marine Conservation Society as they have a lot of experience of engaging with the recreational and commercial sector, commonly using the ‘Community voice’ methods, which has proved to be very effective.
- Creating an MMO area on World Sea Fishing Forum was also suggested.

Other issues raised

There were many other issues raised by stakeholders during our visit to the south coast that the FMP cannot address. Specific issues were passed on to the relevant MMO team(s).

- Bass annual allowance is restrictive and there needs to be a simplification of the bass measures and the bass authorisations process. Bass discards are very high due to the 5% trawler rule. There should be a small allowance available to enable these landings and stop the waste. It was also suggested that all bass breeding stock should be landed, and that selective fishing gear is a must.
- Crab and lobster catches are decreasing each year, minimum sizes need to be harmonised around the country and between the IFCA and MMO, there should be a maximum landing size for the females of both species' sizes. The landing/selling of crab claws should be prohibited. The crabs are caught by the scallop fleet as they migrate to breeding grounds. Brown crab effort increased with falling stocks there are more pots being deployed and consequently more dog fish being landed for bait.
- The commercial sector should be prioritised over the recreational sector in relation to bluefin tuna quota allocation. EU vessels have overfished the 6 – 12 nm and EU effort, especially beam trawlers and fly seine vessels which should be excluded out to the 12nm limit. The EU have made subsidies available to the smaller fishing vessels so they are more efficient and can work more profitably.
- There is a recent increase in the use of multiple trawls - does this increase the effort and therefore the landed catch quantity and value or does this reflect a reduction of overall landed catches by single trawls? Do we need to understand this further? And do we need to observe the trend?
- Kelp beds need more protection to enable them to provide a buffer and protect nursery and brood stock areas.
- The biggest fear is further displacement from management measures. Fear about timelines, concerns that there is a block/buffer of Trade and Cooperation Agreement (TCA) negotiations. It is a tricky dynamic of how to manage the FMP in view of the TCA negotiations.
- The local independent fishers are being squeezed out by larger companies that own multiple vessels.
- There needs to be a new class of fishing licence for Non-Powered Vessels.
- Mental health and wellbeing are an increasing issue amongst the fishing industry due to increasing pressures from other government agencies such as the introduction of the ENG1 (Offshore medical certificate) and new vessel stabilisation rules from the Marine Coastguard Agency (MCA).
- Concerns over the difference between EU and UK fishing practices and management and the MMO's ability and decision making when it comes to inspecting EU vessels.
- There are also concerns that EU pair trawlers are catching protected species such as dolphins and returning them dead to the sea.
- Stakeholders raised that the gillnet fishery has been pushed further offshore and bycatch has become difficult to manage.

- Current catch recording app needs adjustments such as using common names and being able to split the catch to land over several days.
- More research needs to be carried out regarding the discard usage, discards should not be dumped, but landed and used to stop waste.

Feedback on Goals of the FMP

Whilst on the south coast, the FMP team also gathered feedback on the drafted goals of the FMP. The goals of the FMP are split into three themes: Sustainable Fisheries, Social and Economic, and Evidence. Feedback is summarised below.

General:

- The social, economic, and sustainable goals need to be shared with processors and buyers to increase confidence that future fisheries are sustainability and encourage investment by association community benefits.

Sustainable Fisheries theme:

- Climate change is changing species distribution and there are concerns around what this will mean for the future of the fishery. The FMP should address climate change issues and more research is needed into the effects of warming water is having on the fish biology/reproduction cycles.
- New technology needs to be encouraged e.g. into the industry such Sum Wings
- Help and guidance is required to move toward better fishing practices such as appropriate cuttlefish egg removal traps.
- Some anglers have suggested that some species could become a recreational angler catch only, this would help sustain the species as recreational fishing is selective and fish can be returned to the sea alive.
- Some anglers have called for quotas to be applied to the recreational anglers, especially the high value targeted species.
- A balanced/ecosystem approach is needed for future sustainable fisheries.
- Grants are needed to assist the industry with purchasing new and more efficient technology and using more sustainable gear.
- How can sustainability be measured and defined when the non-quota species are data poor and as yet do not have a maximum sustainable yield (MSY). The life cycles of some fish included in the species list is short, it is going to make measurement of a MSY very difficult.
- The sustainability of fish stocks is not just down to fishing activity – this needs to be reflected in the goals (e.g., positive / negative impacts of MPAs, aggregate dredging and windfarms). Can the FMP investigate the impact of windfarms on fish species? It was also suggested that we should be more specific and refer to “sustainability of NQS stocks”.

Social and Economic theme:

- Local management measures and access to the fishery should optimise community benefits. Stakeholders feel that the benefits of the FMP should be for the local community/areas.

- Work that investigates the value of the fishery to the wider community beyond regular economic and social benefits should be prioritised. Fishing is central to the coastal communities, which seems to be misunderstood and its importance is underestimated.
- Direct selling and setting up avenues for the inshore fleet to sell locally to the public could help sustain the inshore fleet and give opportunities to the local coastal communities.
- Need to understand how the inshore fleet and offshore fleets provide different benefits to coastal communities.
- Currently the inshore fleet are struggling to make a living, the inshore fleet would not be able to sustain purely on a NQS fishery. When the inshore fleet struggle to make a living, this has a negative impact on the local community. EU vessel catches in UK waters should be landed into UK ports which would be a benefit to the local community.
- Can there be some defined measure as to what is “reliance”? When trying to define the industry as reliant on NQS there needs to more clarity about that measure. A better term would be to identify in the NQS sector and what are the resulting social and economic benefits.
- Suggested that the EU needs to be recognised as a stakeholder in relation to this FMP. The French industry is organised into regional associations that need to be identified for this FMP and potential management group.
- Recreational fishing is essential for mental health and wellbeing of society. The recreational anglers want to promote the value in recreational angling catching and best practice. There is a need to understand the full scope of economic benefits the angling community brings such as angling club employing local staff and providing safe spaces and support for older members.
- Stakeholders would like to see an industry led FMP management group and be represented by local producer organisations of fisheries associations throughout the FMP process to make sure the views and concerns of the fishers are equally represented. Any management groups should be regional/ by port and meet annually.

Evidence:

- Evidence outcomes of the FMP need to be shared with fishers and carried out at a local scale. Fishermen should be utilised to gather evidence. Some others believe that there is still work to do to engage fishers to encourage them to share data and be part of the evidence gathering.
- A catch per unit effort (CPUE) data base is needed for each species with vessel numbers monitored over the seasons.
- Data between the EU and UK needs to be shared as there is mistrust regarding the EU vessel landing data.
- There is 30 years of logbook data that is available from the larger vessels that could help fill some data gaps.
- Catch and landing data should include numbers of fish as well as weight especially for shellfish.
- Need to investigate a fish sustainability scoring system for NQS and the methods of catching them to help gather and process data.
- The definition of an “inshore fleet” fleet needs to be clearly communicated.

- There is a lag between stock assessments and what fishers see on the ground. Fishers need to be included for reactive management.
- There are significant data gaps and a question as to whether there is funding and time to address the evidence gaps.
- More work is needed with local industry to investigate the different stock maturity ages.
- Anecdotal evidence from fishers can be used and a partnership between fishermen and academics would help to fill evidence gaps. However, some fishers are cautious about duplicating data that has already been collected.
- The benefits and outcomes of the FMP should be mapped and shared as part of the Evidence Statement.
- Angling clubs hold a lot of historic records with data on species, sizes and numbers of fish caught spanning back decades.
- Sea angling diaries have some good data but they are too complicated which puts people off from using them.
- A central recreational database for holding angling data would be a good idea but reassurances needed that it would not be “open access” and would not be used for any enforcement/control issues. However, it was noted that anglers would be very nervous about sharing their data with MMO. It needs to be clear how the data will be used and for what purpose.
- Some of the recreational anglers would like to work with scientists to investigate and analyse local issues such as the over abundant species and predatory pressures.
- Charter boats could be a good source of angling data.
- There is a lack a baseline data for the recreational and inshore fisheries.
- There is some data regarding recreational fishery on social media, along with angling clubs and bait and tackle shops, recreational fleet might be apathetic regarding data submission of data, so the data and views of the recreational fishers maybe skewed by the vocal and engaged few.

Next steps

The FMP team have been working through all the feedback received from the in-person engagement and ensuring that views are captured within the FMP where appropriate. We will be holding a series of workshops with the Channel NQS FMP Working Group to co-refine chapters of the FMP before it goes out to public consultation in summer 2023.

Useful Information

- Fisheries Management Plan Team contact details:
FMP@marinemanagement.org.uk
- [Channel demersal non-quota species FMP gov.uk site](https://www.gov.uk/government/consultations/channel-demersal-non-quota-species-fmp)