



Marine
Management
Organisation

Bass authorisation review

December 2025



...ambitious for our seas and coasts

European Sea bass (bass) (*Dicentrarchus labrax*) authorisation review

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1. Executive summary

This report presents the findings of the bass authorisation review subgroup, a multi-stakeholder partnership convened under the [Bass Management Group \(BMG\)](#) to review the current bass authorisation system.

The subgroup has produced 24 recommendations aimed at enhancing sustainable fishing opportunities, promoting adaptive and evidence-based management of European sea bass (*Dicentrarchus labrax*), and supporting the broader objectives of the [Bass Fisheries Management Plan \(FMP\)](#) including reducing by-catch and discards, improving data collection, and ensuring the long-term sustainability of the bass fishery.

During the review each recommendation was subjected to an analysis of its strengths and weaknesses and are accompanied in the report by benefits, risks and

implementation considerations. It is important to note that these recommendations represent the subgroup's collective findings and opinion and should not be interpreted as final decisions.

All proposals remain subject to formal decision-making processes led by Defra and the BMG. This may involve further consultation, evidence gathering, and assessment of broader implications, including operational impacts for the Marine Management Organisation (MMO). While not all recommendations may be adopted, this process ensures each is carefully considered.

2. Introduction

This report presents the collective findings and recommendations of the bass authorisation review subgroup, a multi-stakeholder group formed under the framework of the [Bass Fisheries Management Plan \(FMP\)](#) and convened through the [Bass Management Group \(BMG\)](#).

The subgroup comprised representatives from the commercial fishing industry, recreational angling sector, conservation organisations, non-governmental organisations, and regulatory authorities. Its purpose was to review the current domestic bass authorisation system in English waters, and provide recommendations to inform areas for improvement, amendment or revocation.

Over a seven-month period, and under the leadership of the Marine Management Organisation (MMO), the subgroup conducted in-depth discussions to evaluate the strengths and weaknesses of the existing authorisation system and broader opportunities.

This report outlines 24 recommendations aimed at enhancing sustainable fishing opportunity, adaptive management and evidence-based management of European bass stocks. These recommendations also support broader FMP goals, including reducing bycatch and discards, improving data collection, and ensuring the long-term sustainability of the bass fishery.

This document is a transparent reflection of the collaborative efforts of the subgroup's diverse membership with the resulting recommendations intended to guide future policy development and implementation under the bass FMP.

It is a testament to the power of collaboration across a diverse stakeholder group that has navigated a complex landscape of differing priorities, perspectives, and operational needs through mutual understanding and trust, demonstrating a shared commitment to constructive dialogue.

This achievement will not only strengthen the bass authorisation system in the future but also sets a benchmark for future collaborative efforts in fisheries management. It highlights how, even in the face of differing opinions and priorities, a shared vision and inclusive approach can lead to meaningful, lasting progress.

This document compiled by MMO has been reviewed by the subgroup members to ensure that it accurately reflects their contribution during the analysis phase of the authorisation review.

3. Structure of this document

Where relevant, the recommendations in this report are organised into thematic sections. Each section includes:

- **Background context**, including relevant legislation and guidance.
- **A summary of analysis** and insights gathered during the review.
- **A stakeholder input** summary from stakeholder engagement events.
- **Detailed recommendations**, each accompanied by:
 - anticipated benefits
 - associated risks
 - proposed mitigations and Implementation considerations
 - a list of dependencies relevant to each recommendation

Report Structure

- **Section 2:** Background to the review.
- **Section 3:** Review process, methodology and subgroup membership.
- **Section 4:** Engagement and transparency.
- **Section 5-11:** Thematic recommendations.

Annexes:

- **Annex 1:** Policy steer and scope of the review.
- **Annex 2:** Stakeholder engagement events summary.
- **Annex 3:** Full list of recommendations.
- **Annex 4:** Opportunities considered but descoped.
- **Annex 5:** Bass authorisation review Task and Finish group membership.

4. Background

The bass fishery has several management measures aimed at protecting the stock. These were introduced in 2015 after warnings of stock decline due to multiple years of poor recruitment and high fishing pressure. These measures include:

- Minimum Conservation Reference Size (MCRS).

- Domestic authorisations for commercial bass fishing.
- Seasonal closures for both commercial and recreational fishers.
- Landing and bycatch limits for all sectors.

In December 2023, the Bass Fisheries Management Plan was published, providing a roadmap for the long-term sustainable management of European bass fisheries. An action within the FMP (**Goal 2**) is to review the authorisation system.

The FMP recognises that the existing commercial bass authorisation system has been effective in capping fishing effort and improving sustainability of European bass stocks but seeks to review the system, ensuring equitable access to the fishery while prioritising stock sustainability.

Any alternative system would seek to maintain access to the fishery, align with other FMP goals for example, reducing discarding, minimising environmental impact (sensitive species bycatch) and maximising benefits to local coastal communities.

FMP Goals related to the bass authorisation review

Goal 3. Minimise discarding of bass bycatch where survival rates are low.

Adopt an alternative authorisation system if agreed to help minimise discarding.

Goal 5. Maximise the benefits of bass fishing for local coastal communities.

Maximise benefits for different groups, such as commercial inshore fishermen or recreational sea anglers.

Goal 8.1. Minimise and, where possible, eliminate bycatch of sensitive species in bass fisheries. Consider allowing fishers with relevant authorisations the option to switch from using fixed nets to hook and line gears associated with a lower risk of sensitive species bycatch and to improve monitoring to better understand sensitive species bycatch in bass fisheries.

The Bass Management Group formed by Department for Environment Food and Rural Affairs (Defra) under FMP **Goal 1** held its first meeting on **8 November 2024**. During this meeting to ensure effectiveness of the BMG at delivering its aims, smaller subgroups, known as 'task-and-finish' groups would be formed to tackle specific measures set out in the bass FMP.

MMO were tasked to lead on the review of the bass authorisation system and formed a subgroup consisting of members of the BMG and other stakeholders, meeting for the first time on the **16 December 2024**.

5. Process and Methodology

Following its initial meeting, the bass authorisation review subgroup convened fortnightly for two-hour sessions concluding its analysis and document review in **September 2025**.

The review was structured around a strengths and weaknesses analysis of the current authorisation system, guided primarily by the Defra policy guidance and scope document (**Annex 1**). During subgroup meetings and additional engagement events, broader opportunities and issues were raised, these were subjected to the same analytical approach.

Opportunities reviewed through this process were either:

- Excluded (descoped) due to identified weaknesses, or
- Put forward as recommendations in this report.

While consensus was reached on many recommendations, the diversity of the group naturally led to occasional differences in opinion and organisational priorities. In cases where consensus could not be achieved, and to ensure full transparency these disagreements have been documented in this report, with an emphasis on the underlying risk and rationale.

Subgroup membership

The outcome of the review reflects the collaborative efforts of subgroup members, many of whom participated on a voluntary basis. Individually members contributed to multiple meetings, in addition to time spent between sessions reviewing documents, engaging with their respective sectors, and attending stakeholder engagement events.

Membership comprised of representatives from the BMG and other participants where gaps in knowledge or expertise were identified.

Bass authorisation review Task and Finish group membership can be seen at **Annex 5**.

Participants not only worked towards shared outcomes but also made a conscious effort to understand each other's experiences and priorities. The broad consensus achieved on many points reflects a genuine commitment to collaboration across sectors.

6. Transparency and Engagement

Transparency

The terms of reference for the bass authorisation review subgroup were aligned with those of the [BMG](#) specifically with regards to transparency. At the request of subgroup participants, a summary document (lines) was produced following each meeting. This document captured key discussion points and emerging recommendations.

While it could be shared with wider networks to keep stakeholders informed of progress, it was clearly caveated that these recommendations did not represent final decisions. All outputs from the subgroup remain subject to a formal decision-making process led by Defra and the BMG, which may include further consultation, evidence

gathering, and assessment of broader impacts. The subgroup membership was provided with meeting transcripts, meeting summary and a copy of the strengths and weaknesses analyses document used to record discussions.

Engagement

A series of engagement events were delivered with the support of the [Regional Fisheries Groups \(RFG\)](#) taking place at various coastal locations across the country (**Annex 2**). These events designed to enhance the analysis phase of the review followed a consistent format aligned with the approach used by the review subgroup, featuring a structured set of questions based on the policy steer (**Annex 1**) and broader opportunities identified during the review process.

Participants were informed that their input was critically important to the outcome of the review. They were first encouraged to identify the strengths and weaknesses of specific aspects of the current authorisation system before being invited to consider broader opportunities. This sequencing was designed to minimise bias and avoid influencing participants views.

In total, 20 in person events were held, engaging with nearly 300 stakeholders. While open to all, the coastal locations naturally attracted a majority of commercial fishing stakeholders and representatives from the Inshore Fisheries and Conservation Authorities (IFCA). Notably, six events in the South and South West were attended by the Bass Anglers Sportfishing Society's recreational angling and conservation representative from the subgroup, whose presence added valuable context and balance to the discussions.

To ensure broader accessibility, an additional online engagement event was held, primarily aimed at the recreational angling sector. This provided an opportunity for participants to gain insight into the review and contribute their perspectives.

7. Track records

The review of the track record system focused primarily on the following policy considerations.

1. Should authorisations still be based on a track record, or moved to another system?
2. Should the bass fishery remain a closed commercial fishery?
3. Is an authorisation the right method to grant bass fishing rights?
4. How do we best encourage stock recovery within this system?
5. How do we balance accessibility to the fishery with sustainability?
6. How do we deal with latent capacity?

During track record discussions in the authorisation review subgroup and wider engagement meetings, broader opportunities were identified, each of these broader opportunities were analysed for their strengths, weaknesses, and risks. Where relevant, recommendations arising from broader opportunities are included in this section.

Background

Since 2015, joint United Kingdom (UK) and European Union (EU) management has reduced fishing pressure on the northern bass stock through a range of measures which includes the control of effort through a track record process.

This process ensured that commercial fishing vessels that were historically active in the bass fishery in ICES divisions 4b and 4c and sub-area 7 of United Kingdom (UK) could continue to land bass by certain gear type, providing they could demonstrate a track record of landing bass during the reference period of 1 July 2015 to 30 September 2016.

Those successful in demonstrating track record of landing bass during the reference period were issued an authorisation by gear type linked to the vessel hull.

An authorisation administered by MMO is required for English registered commercial fishing vessels to land bass using fixed gillnets (bycatch) or by hook and line gear. Catching bass using hook and line is the only authorised targeted fishery. If using fixed gillnets bass can only be fished and landed as bycatch.

Since 2021 all commercial fishing vessels are now authorised to land bass bycatch (subject to a landing limit and catch composition) by demersal trawls and seines and no written authorisation is required. [The Sea Fisheries \(Amendment\) \(No. 2\) Regulations 2021](#)

Analysis

Summary

Analysis of the track record system was positive in relation to the benefits to the stock. However, a review of MMO authorisations data identified that the number of authorisations issued across all gear types has reduced over time (**figure 1**), providing limited opportunities to access the fishery by those without track record and restricting the ability to maintain the fleet.

With no reliable information as to the reason for the decline of authorisations the group speculated that it was likely to be caused by retirement, vessels moving out of the area and older vessels no longer being capable of being licensed.

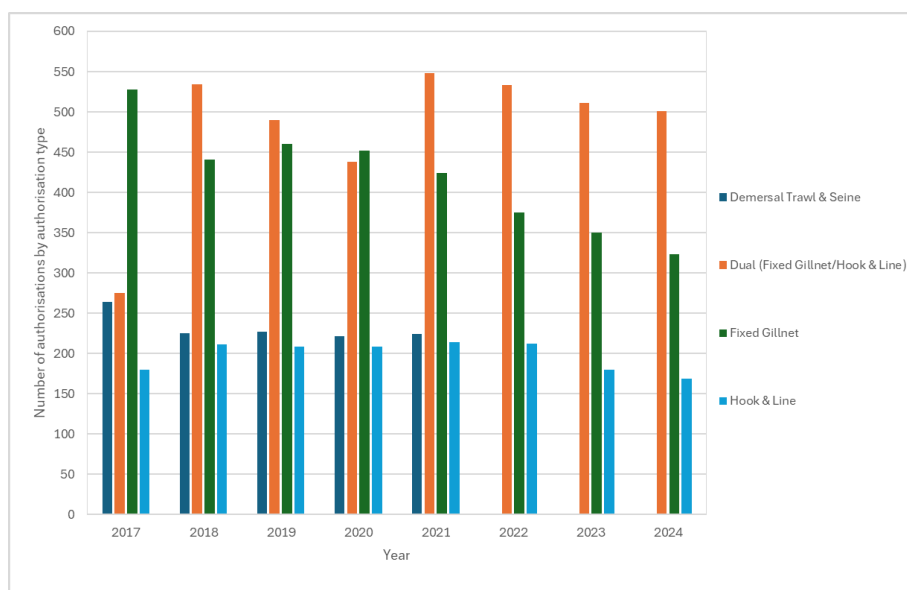


Figure 1. Total number of authorisations issued by gear type 2017 to 2024.

Table 1: Percentage decrease of authorisations issued by authorisation type from peak of authorisations to 2024. *Under 2021 regulations all commercial fishing vessels are now authorised to land bass bycatch by demersal trawls and seines, and no written authorisation is required.

Year	Demersal Trawl & Seine	Dual (Fixed Gillnet/Hook & Line)	Fixed Gillnet	Hook & Line	Total Fixed Gillnet/Hook & Line
2017	264	275	528	180	983
2018	225	534	441	211	1186
2019	227	490	460	208	1158
2020	221	438	452	208	1098
2021	224	548	424	214	1186
2022	0	533	375	212	1120
2023	0	511	350	180	1041
2024	0	501	323	169	993
Increase/Decrease		-47	-137	-45	-193
Percentage		-9%	-24%	-21%	-16%

In certain circumstances, bass authorisations can be transferred between licensed fishing vessels and the only way for individuals (without track record) to enter the fishery would be through the purchase of a vessel with a track record (authorisation) attached.

The practice of attaching the authorisation to the vessel hull monetised the fleet to varying degrees around the country. This monetisation of the fleet adds further barriers to access due to the additional financial commitment, particularly for young persons wishing to enter the fishing industry and the bass fishery.

Despite the fall in the number of vessels authorised to land bass the total landing weight has not followed this trend but has increased gradually in line with changes to the annual landing limits (**Figure 2** and **Figure 3**).

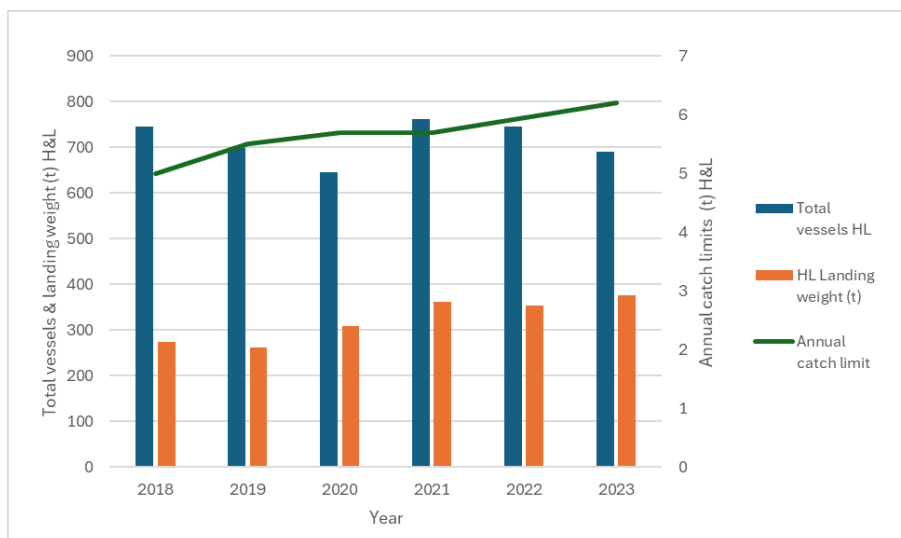


Figure 2. Total number of vessels authorised to land bass by hook and line (dual authorisations and hook and line authorisations combined) annual landing weight in tonnes and changes to the annual catch limits.

The left-hand axis on **figure 2**, organised by year 2018 to 2023 represents the total number of vessels authorised to land bass by hook and line gear and the total landing weight in tonnes. The right-hand axis represents the annual landing limit change in tonnes.

For example, in 2023 691 vessels were authorised to land bass by hook and line landing 376 tonnes. The hook and line landing limit for this year increased to 6.2 tonnes.

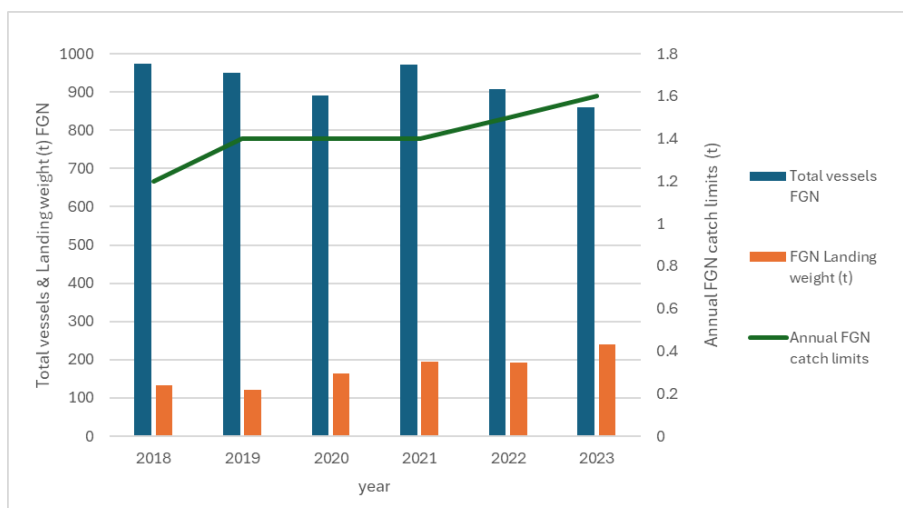


Figure 3. Total number of vessels authorised to land bass as bycatch with fixed gillnet (dual authorisations and fixed gillnet authorisations combined) annual landing weight in tonnes and changes to the annual catch limits.

The left-hand axis on **figure 3**, organised by year 2018 to 2023 represents the total number of vessels authorised to land bass by fixed gillnet gear and the total landing weight in tonnes. The right-hand axis represents the annual landing limit change in tonnes.

For example, in 2023 861 vessels were authorised to land bass by fixed gillnet landing 239 tonnes. The Fixed gillnet (bycatch) landing limit for this year increased to 1.6 tonnes.

Stakeholder engagement

During engagement meetings stakeholders recognised the track record representations process but stated that the track record reference period was too short, unfair and discriminatory, indicating that some who were invested in the bass fishery felt punished for diversification whilst fishing for other species during the reference period, vessels in refit, repair or individuals suffering ill health.

Most regions agreed that track records and the resulting control in effort did its job in terms of stock protection but was now overly restrictive. Fishing opportunity was affected as the track record process gave no consideration to the specific fishing practice at a regional level due to the blanket restriction on gear type, an example raised was inshore drift netting in the East of England.

Stakeholders agreed with the necessity to protect the stock but stated that a new system is now required to enable effective management of the fleet and improve fishing opportunity, particularly important due to the perceived geographical changes to the stock and the reduction of fishing opportunities with other species such as pollack in the South West.

1. Should authorisation still be based on a track record?

Of the 20 engagement events held, 18 meetings reached a consensus and expressed opposition to this consideration. Participants noted a regional decline in fishing vessels and advocated for changes to the track record process to help maintain fleet capacity and ensure continued fishing opportunities. One meeting,

held at a venue in the Northwest, supported the current authorisation system, citing the need to protect their specific local circumstances, whilst participants at the online event aimed at recreational fishers stated that there should be no plans to expand the fishery whilst in their view, the existing fishery has failed to be enforced adequately.

2. Should the bass fishery remain a closed commercial fishery?

17 of 20 stakeholder engagement events held reached a consensus responding negatively to this consideration, highlighting that efforts should be made to maintain the fleet and encourage new fishers particularly young people into the industry. However, apprehensions were raised that by opening the fishery to unlimited vessels this could negatively impact the stock, affect the market value of bass, and demonetise vessels with a bass authorisation. Any additional fishing opportunity must be based on science and should relate to the maximum track record capacity enabling the fleet to be maintained at that level.

Recommendations

Recommendation 1: The track record system for issuing bass authorisations should be amended to provide fishing opportunity.

An alternative system would seek to maintain access to those currently authorised and identify fishing opportunities for commercial fishers wishing to enter the bass fishery subject to stock, capacity, and sustainability limits.

The track record system has several limitations:

- The number of authorisations that are issued each year are declining over time.
- The ability to maintain the current fleet size as it depletes is limited.
- There is limited flexibility to allow new entrants into the fishery as the fleet declines or the stock changes.

The fishery should no longer remain a closed commercial fishery but allow access to commercial fishers wishing to enter the bass fishery within established historical sustainable limits, with consideration to sensitive species bycatch. Bass authorisations should be set as a cap using historic track record data to ensure fishing pressure does not exceed desired levels and aligning with the legislative requirements under [Council Regulation \(EU\) 2020/123](#) In terms of fishing capacity.

MMO authorisations data (**table 1**) shows that the maximum number of authorisations based on track record declarations is 1186 distributed across authorisation types fixed gillnet, hook and line, and dual authorisations. The number of authorisations has declined since its peak in 2021 by 193 to its current number of

993. The total amount of authorisations subject to stock assessments should be capped at the maximum historical track record number.

The group advocated for an aim to strive towards a situation where access can be restored and allowing flexibility in fishing practice. Future decisions around landing limits could look to increase authorisations rather than landing limits as stocks improve and to explore ways for the fishery to be innovative towards selectivity.

It was agreed that a localised or regional approach to bass management remains best addressed through national measures, with flexibility to tailor responses to specific regional issues on a case-by-case basis. While it was not recommended to introduce regional variation in the authorisation process, the group proposes establishing a medium to long term objective to explore regional management of both authorisations and the stock itself. This could involve regional trials aimed at developing selective and locally appropriate fishing practices, as well as evidence gathering projects to monitor regional stock variations. These efforts could be supported by the implementation of spatial and temporal closures where appropriate.

Recommendation 2: Analysis of data to identify fishing opportunities.

The track record recommendation to remove the closed element of the bass authorisation system (**Recommendation 1**) and allow maintenance of the total bass fleet would increase fishing pressure on the stock. A further recommendation for analysis of data to identify fishing opportunity ensures that the benefit to the stock continues. Analysis of data is required prior to a final decision on fishing opportunity which would include ICES stock assessment, regional stock information and guidance from the Bass Management Group.

Recommendation 3: Create a pool of authorisations for use in a young persons/new fishers scheme.

The recommendation to remove the track record requirement (**Recommendation 1**) provides the potential for additional fishing opportunity and was discussed in the authorisations review subgroup and wider engagement meetings. This recommendation provides the ability to manage and prevent continued decline in the bass fishing fleet whilst creating additional benefits to coastal communities particularly young persons through organised schemes.

Recommendation 4: Create a pool of authorisations for use in alternative gear trials.

During events around the coast many stakeholders expressed the need for trials to look at alternative gears for the bass fishery, stating that the bass measures did not necessarily reflect the regional picture in terms of historical fishing methods and bass abundance. Trials would be beneficial at a regional level dealing with issues such as seal predation, enabling some flexibility in fishing practice and keeping up with

environmental changes. For example, based on stakeholder engagement events, Stakeholders in the East and South East advocated for trials in a limited drift net fishery, (**Recommendation 5, Inshore Drift Netting Scientific Trial**).

Benefits

1. Legislation and policy

- This approach aligns with multiple goals of the Bass Fisheries Management Plan (FMP), including **supporting coastal communities through regional fleet management (Goal 5), ensuring sustainable harvesting based on scientific advice (Goal 6), reducing discards in mixed fisheries (Goal 3), and minimising bycatch of sensitive species (Goal 8.1) by promoting the use of lower-risk gear types such as hook and line.**
- This would be consistent with obligations under the [Fisheries Act 2020](#) specifically the **National Benefit Objective** in that ***fishing activities of UK fishing boats bring social or economic benefits to the United Kingdom.*** Giving fisheries managers the ability to maintain the fleet size within capacity limits will provide social and economic benefits to coastal communities and businesses.
- Delivering in line with [MMO strategic goals](#) specifically, **Goal 6 - Assure the sustainable and transparent management of fishing opportunities to achieve a resilient and increasingly viable fishing sector.**
- Aligning with the legislative requirements under [Council Regulation \(EU\) 2020/123](#) In terms of fishing capacity where the number of authorised United Kingdom fishing vessels and overall fishing capacity does not increase.
- This would help to achieve Good Environmental Status and align with obligations under the [UK Marine Strategy](#), Specifically, **D1 and D4 where the long-term viability of marine bird populations, cetaceans and seals are not threatened by deaths caused by incidental bycatch catch in mobile and static fishing gear**, providing that the number of gillnets fished does not increase and gears (hook and line) supporting the reduction of sensitive species bycatch are promoted.
- This would be consistent with **Goal 6** of the [Environmental Improvement Plan](#) to **ensure that fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield and to reduce negative ecosystem impacts**, providing that increased fishing opportunity is based on scientific advice promoting gears that support a reduction of sensitive species bycatch.

2. Stock

- Increased discard data collection through gear trials, utilising [Inshore Vessel Monitoring System \(I-VMS\)](#) and catch app to support stock assessments providing the ability to understand the stock at a regional level assisting fisheries managers in decision making.
- Commercial fishers wishing to enter the bass fishery could be encouraged to develop a selective and sustainable fishery particularly if they are encouraged to use hook and line.
- The reduction in discards for those non authorised fishers employing an existing mixed fishery using gillnets.

3. Fishing opportunity

- Providing inshore fishers with greater fishing opportunity.
- Boosting income for fishers, processors, and coastal communities supporting small scale inshore fisheries.
- Legal access to the fishery could reduce illegal, unreported and unregulated fishing.
- Enables the development of alternative gear types.
- Provides opportunity to attract young people into the fishing industry.

Risks

1. No Action

- The government could fail to be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 5: *Maximise the benefits of bass fishing for local coastal communities.*** Bass fisheries contribute culturally, socially, and economically to coastal communities, continued decline in the inshore fleet would impact on this contribution with the potential for job losses and reduced income. Anecdotal information gained during stakeholder meetings indicates that the bass stock is changing and moving into areas where it has previously not been seen, providing the potential for increased social and economic benefits at a regional level across commercial and recreational sectors.

2. Enforcement and compliance

- Concerns about the specific targeting of bass aggregations by gill netters have been raised in the subgroup and wider engagement meetings. Increasing the

current number of authorisations could place an additional enforcement burden on regulators.

- Misreporting of bass landings by gear type by those with dual authorisations was raised as an issue in the authorisation review subgroup and stakeholder meetings. If new authorisations create additional dual authorisations this could increase this concern.
- One of the aims of this recommendation is to provide fishing opportunity by maintaining the fleet at a maximum capacity subject to sustainability limits. This could create an additional regulatory burden and require additional resource.

3. Stock and Data

- Additional authorisations could increase effort and mortality placing additional pressure on the stock.
- During the stakeholder events around the coast fishers perceived an abundance of fish in certain areas and increased discards. Therefore there is a risk that authorisations could become regionally focused and unsustainable.
- The process of issuing additional authorisations could be complicated. Many commercial fishing stakeholders advocated for authorisations to be prioritised in areas with existing bass populations, as opposed to allowing fishing opportunity in areas where bass stocks are emerging.

4. Environment

- Additional fixed gillnet authorisations provided to commercial fishers not currently undertaking a mixed fishery with regards to netting would create wider environmental implications, particularly if the net fishery is increased. Increasing the number of nets in the water may have a negative impact on sensitive species bycatch.
- Allowing new entrants into the fishery could create gear conflicts with recreational anglers, other commercial fishers, and marine tourism operators.

5. Latent Capacity

There are three identified aspects to latent capacity in the bass fishery each contributing to the potential that if activated, previously unutilised fishing effort could lead to overfishing and negatively impact the stock.

1. Unfished catch limit

It has been recognised by the authorisations review subgroup and by the BMG that if every authorised vessel landed their allocated landing limit, then the landed amount

would be well in excess of the ICES advice for removals. **Table 2** and **Table 3** below shows the number of active authorised vessels that reach their landing limit.

2. Unused authorisations

In the bass catching fleet the total number of vessels landing bass is lower than the number of vessels authorised to land bass. Unused authorisations were discussed including an option to recover unused authorisations. The group recognised that there may well be authorisations that are not used in the fleet, however it was highlighted that most vessels with a bass authorisation employed a mixed fishery approach, for the purpose of diversification and flexibility. Recovering unused authorisations was descope for that reason.

3. Potential catching capacity

The creation of additional authorisations within the maximum historic track record figures creates additional catching capacity.

Table 2 fixed gillnet authorisations and **Table 3** hook and line authorisations below illustrate the number of unfished authorisations, the average landing weight in kg and the number of vessels landing bass within weight brackets from 2018 to 2024.

Analysis of the tables identifies that although latent capacity exists in the fleet as described above, the utilised effort has remained consistent and stable. Fisheries managers would however need to have a mechanism to be able to manage any uptake of latent capacity, should it be required.

Table 2: Fixed gillnet (FGN) authorisations showing the number of unfished authorisations, the average landing weight in kg and the number of vessels landing bass within weight brackets from 2018 to 2024.

	2018	2019	2020	2021	2022	2023	2024
Total no of vessels authorised to land with FGN	975	950	892	972	908	861	824
Total landing weight kg	133315	121356	164698	195951	193047	239215	134215
Total number of vessels landing	640	602	597	589	564	536	462
Average landing weight kg per vessel	208	202	276	333	342	446	291
No of vessels landing <100kg	413	371	323	303	258	223	212
No of vessels landing >100kg and <500kg	199	205	232	227	254	154	159
No of vessels landing >500kg and <1000kg	16	19	28	36	39	81	56
No of vessels landing >1000kg and <1200kg	2	3	3	8	10	18	11
No of vessels landing >1200kg and <1400kg	1	0	2	2	6	17	7
No of vessels landing >1400kg and <1600kg	2	3	3	8	10	12	10

Table 3: Hook & Line (H&L) authorisations showing the number of unfished authorisations, the average landing weight in kg and the number of vessels landing bass within weight brackets from 2018 to 2024.

	2018	2019	2020	2021	2022	2023	2024
Total no of vessels authorised H&L	745	698	646	762	745	691	670
Landing weight Kg	273329	261962	309001	361541	353455	356733	403895
Total number of vessels landing	533	533	511	542	526	512	536
Average landing weight per vessel Kg	513	491	605	667	672	697	754
No of vessels landing <100kg	236	283	214	220	194	176	208
No of vessels landing >100kg and <1000kg	211	174	203	221	223	222	206
No of vessels landing >1000kg and <2000kg	45	38	49	41	55	57	58
No of vessels landing >2000kg and <3000kg	25	16	19	26	28	25	27
No of vessels landing >3000kg and <4000kg	7	11	13	14	12	21	14
No of vessels landing >4000kg and <5000kg	8	9	8	13	9	7	13
No of vessels landing >5000kg and <6000kg	1	2	5	7	5	3	8
No of vessels landing >6000kg and <7000kg	0	0	0	0	0	1	2

Implementation and Mitigation

1. To be consistent with **Goal 6** of the [Bass Fisheries Management Plan \(FMP\)](#), ***Sustainable harvesting of bass stock in line with scientific advice***. Additional agreed fishing opportunity (authorisations) should be allocated in accordance with ICES scientific advice with the development and support of regional scientific information.
2. Dual authorisations provide flexibility in fishing practice however misreporting between fixed gillnets and hook and line presents a risk. Manipulation of different landing limits can significantly increase the number of bass a vessel is able to land, affecting the stock and reducing the ability to provide effective management. Mitigation may be provided by not issuing a dual authorisation without having an effective mechanism to enforce misreporting by dual authorised fishers.
3. Additional authorisations provided within this recommendation would be prioritised to encourage the use of hook and line gears associated as a lower risk to sensitive species bycatch.
4. The issuing of additional authorisations including a young person's scheme requires careful balancing of sustainability, fairness, and enforceability and should be approached in a structured manner. The process should consider the [Equality Act 2010](#) and define a clear eligibility criterion, this could be by gear type, vessel size or discard data for example, utilising stakeholders in the process and looking to other fisheries for best practice. Criteria should be published to ensure fairness and transparency.
5. By creating additional fishing opportunity, the risk of misreporting of bass landings by gear type and targeting of bass aggregations could increase. Providing additional authorisations would benefit from an understanding of the risk alongside compliance assurances if appropriate. Creating additional fishing opportunities may increase the risk of misreporting bass landings by gear type and the targeting of bass aggregations. Any provision of extra authorisations

should be informed by an assessment of these risks and include appropriate compliance assurances

6. The creation of a young person's scheme should be coordinated by a local commercial fishing organisation, stakeholder groups and regulators with careful consideration to safeguarding, safety and fairness.
7. Monitor the impact of latent capacity in the bass stock to ensure that fishing effort remains within scientific advice and ensure fisheries managers have a mechanism to react to unsustainable fishing pressure, with awareness of the race to fish risk should sudden closure of the fishery be predicted. Currently bass landing limits are within the fishing vessel licence and therefore provides a potential mechanism to adjust, however variations would need to be more reactive for example with monthly landing limits, a yearly landing limit does not provide an effective mechanism to react to changing stock.

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**.

Table 4 below shows the dependencies associated with this recommendation and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.
- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.

Table 4: Dependencies

Recommendation	Type	Dependency
1 The track record system for issuing bass authorisations should be amended to provide fishing opportunity.	External dependency Scientific advice	Recommendation 2. Analysis of data to identify fishing opportunity. Additional agreed fishing opportunity (authorisations) should be allocated in accordance with ICES scientific advice
	External dependency Compliance assurances	Providing for additional authorisations could not be achieved without compliance safeguards regarding misreporting and targeting bass aggregations.
	Discretionary dependency Eligibility criteria	The issuing of additional authorisations requires careful balancing of sustainability, fairness, and enforceability and should be approached in a structured manner looking to other fisheries for best practice. Criteria

			should be published to ensure fairness and transparency.
		External dependency MMO administration and resource	Recommendation 24. Move from a manual database to an existing automated database on (SFM) Sea fisheries Management. Increasing the number of authorisations requires a system that allows this to be efficient.
2	Recommendation for analysis of data to identify fishing opportunity.	External dependency Scientific advice	Additional agreed fishing opportunity (authorisations) should be allocated in accordance with ICES scientific advice would require allocated resource
3	Recommendation to create a pool of authorisations for use in a young persons/new fishers scheme.	External dependency Recommendation 1	Recommendation 1 The track record system for issuing bass authorisations should be amended by removing the track record requirement.
		External dependency Compliance assurances	Providing for additional authorisations could not be achieved without compliance safeguards regarding misreporting and targeting bass aggregations. Compliance and Enforcement recommendations Section 9.
		Discretionary dependency Eligibility criteria	Develop an eligibility criterion
4	Recommendation to create a pool of authorisations for use in alternative gear trials.	Internal dependency Implementation options and sensitive species bycatch mitigation	Reliant on the use of the appropriate mitigants listed in drift netting trial Recommendation 5.
		Mandatory Dependencies	Legislative and regulatory implications listed in the drift netting trial risks
		External dependency	Trial structure and implementation options listed in Recommendation 5. Inshore Drift Netting Scientific Trial

8. Inshore Drift Netting Scientific Trial

During the review of the track record process a recommendation to remove the track record requirement was created (**Recommendation 1**). This recommendation would seek to maintain access to those currently authorised and identify fishing opportunities within the historic track record limit. The recommendation provides the ability to manage and prevent continued decline in the bass fishing fleet whilst enabling potential fishing opportunity, this includes research into alternative gear types that reflect fishing practice at a regional level.

This aspect of the review focused on an inshore drift netting scientific trial with the following considerations:

1. How do we balance accessibility to the fishery with sustainability?
2. Consider overall effort – are localised and regional approaches more appropriate?

Background

Currently subject to having a bass authorisation fishers are only permitted to catch and retain bass as a bycatch using fixed gillnet and with hook and line as the only targeted bass fishery. All commercial fishing vessels are now authorised to land bass (subject to landing limits) caught by demersal trawls and seines, and no written authorisation is required. Fishers are not allowed to catch and retain bass with any other gears and this includes drift nets.

A 'Drift net' is defined as any gillnet held on the sea surface or at a certain distance below it by floating devices, drifting with the current, either independently or with the boat to which it may be attached. It may be equipped with devices aiming to stabilise the net or to limit its drift.

From 2015 as part of a package of broader regulations aimed at protecting declining bass stocks joint United Kingdom (UK) and European Union (EU) measures prohibited drift netting for bass. This was due to the effectiveness of drift nets in the bass fishery, the resulting impact on fish mortality and concerns about the impact of bycatch on sensitive and protected species including cetaceans, seabirds and other marine fauna.

It should be noted that currently drift nets of many different types are legally permitted for certain species in the UK.

Analysis

Summary

Goal 8.1 of the [Bass Fisheries Management Plan \(FMP\)](#) states that incidental catches of sensitive species is minimised and, where possible eliminated whilst the ecosystem objective in the [Fisheries Act 2020](#) states that;

(a) fish and aquaculture activities are managed using an ecosystem-based approach so as to ensure that their negative impacts on marine ecosystems are minimised and, where possible, reversed, and

(b) incidental catches of sensitive species are minimised and, where possible, eliminated.

The [Marine wildlife bycatch mitigation initiative](#) provides more detail policy objectives and reflects that reducing bycatch is complex and likely to require solutions that are tailored to different needs in different fisheries. It recognises the importance of stakeholders, including the fishing industry, non-governmental organisations, and experts, to collaboratively develop and implement solutions that are ambitious, effective and practical.

As part of the bass authorisation review process the subgroup considered and analysed broader opportunities, this included specific requests during the stakeholder engagement events in the East and South East for an inshore drift netting scientific trial to be considered. Due to the weight of stakeholder opinion, the group concluded that it would be appropriate to analyse this option.

The bass authorisation review subgroup concluded its analysis with a recommendation for an inshore drift netting scientific trial. However, full consensus was not achieved among all sectors represented. Participants from the recreational sector and the Royal Society for the Protection of Birds (RSPB) opposed the recommendation, citing concerns about increased bycatch of sensitive species and the potential for reinforcing allegations of illegal targeting of bass by net fishers.

In contrast, representatives from the commercial fishing sector and Inshore Fisheries Conservation Authority (IFCA) supported a recommendation for a trial. They emphasised the importance of the inshore commercial fleet and argued that a well-coordinated scientific trial could provide carefully managed regional access to bass stocks around the coast. They also highlighted the potential to reduce sensitive species bycatch and the benefits to mitigating seal predation and challenged what they viewed as misconceptions about the impacts of inshore drift netting compared to offshore operations, adding that drift nets are legally used in many other fisheries. Commercial fishers argued that the impact on the bass stock was primarily caused by drift netting in the Eastern channel, which was particularly effective at targeting aggregations, as opposed to inshore drift netting reported to have a lesser impact.

This recommendation is for an inshore drift netting scientific trial. It is being submitted due to the strong regional support expressed by regulators and commercial fishers in the East and South East regions, this is despite the lack of consensus within the authorisation review subgroup and the potential risks identified.

There was interest from fishers to collaborate with a range of stakeholders in designing a highly monitored inshore drift netting scientific trial, with the aim of exploring the potential benefits of a well-regulated inshore drift net fishery, demonstrating the benefits to sensitive species and seal predation compared to other metiers.

It was raised in the subgroup meetings that prior to publication of the [Bass Fisheries Management Plan \(FMP\)](#) MMO had been collaborating with stakeholders on a draft proposal for an inshore drift netting trial as preparatory work to inform the Bass FMP.

However, it has since been reported that this earlier work has been overtaken by the FMP process and has had no influence on this recommendation.

Stakeholder engagement

During the stakeholder engagement phase of the bass authorisation review, numerous participants emphasised the urgent need to reassess the range of gear types permitted in the bass fishery. Many expressed strong interests in participating in an inshore drift netting scientific trial to evaluate the potential for landing bass either as bycatch or as part of a targeted inshore drift net fishery.

Commercial fishers from the East and South East regions argued that the current permitted gear types are often impractical for small-scale inshore fishers. They noted operational challenges such as poor water quality, strong tidal flows, and increasing levels of seal predation. Additionally, they argued that the existing ban on drift netting in the bass fishery was based on fishing practices not reflective of their local, traditional methods, and therefore failed to account for regional fishing approaches.

Commercial fishers emphasised that current bass regulations restrict fishing opportunities and do not adequately consider regional variations in fishing practices. The blanket prohibition on certain gear types in the bass fishery was seen as overlooking the specific needs and conditions of small-scale inshore fisheries. While commercial fishers supported the overarching goals of protecting sensitive species and reducing bycatch, they felt that broad, one-size-fits-all restrictions were not appropriate for their local contexts.

To address these concerns, commercial fishing stakeholders proposed a limited, coordinated, and tightly controlled inshore drift netting scientific trial. They suggested that such a trial could help reduce bycatch of sensitive species by using a variety of mitigations such as short soak times and net attendance. Scientific evidence was cited indicating that drift nets may result in lower fish mortality compared to fixed gillnets ([FMP Annexes](#)), and that their use could reduce seabed disturbance and the risk of ghost fishing from lost gear.

Commercial fishing stakeholders also noted that drift nets can be effectively monitored with net attendance and managed through measures such as closed seasons and areas, limits on soak times and gear length. They argued that this approach would offer better protection for sensitive species while also helping to mitigate seal predation, which they identified as a growing and significant issue in many inshore areas.

1. Should we allow the use of other gear types - Drift netting trial?

Of the 20 stakeholder engagement events held, 18 supported an inshore drift netting scientific trial. Participants recognised concerns around bycatch of seabirds, and marine mammals but stated that if coordinated and controlled adequately, with the appropriate control measures, then a limited inshore drift netting fishery could be of benefit to sensitive species.

Fishers raised the significant impact on fixed gears from seal depredation, offering drift netting as an option to improve this. Commercial fishing stakeholders indicated that it would be possible to balance the need to protect sensitive species with the economic needs of fishers.

One stakeholder meeting on the south coast did not support an inshore drift netting scientific trial stating that hook and line should be promoted as the only official gear type, but consideration could be given to other selective gear trials.

Participants at the online event focussing on recreational fishers opposed the trial arguing that the mobility provided by drift netting means that some fishers could target aggregations, increasing fishing pressure and mortality for no benefit other than for those active fishers.

Recommendations

Recommendation 5: Implementation of a limited regional inshore drift netting scientific trial

A carefully coordinated and structured regional inshore drift netting scientific trial is recommended. The trial should include active collaboration and engagement with stakeholders across the regulatory, recreational, commercial, and non-government organisations. Oversight should be ensured with appropriate monitoring which could include Remote Electronic Monitoring (REM), onboard observers or gear monitoring and tracking technology. The trial must incorporate robust technical conservation measures, including:

- Defined closed times and periods.
- Mesh size and net length restrictions.
- Soak time limits.
- Vessel size limitations.
- Location-specific restrictions based on regional conditions.
- Comparison to other gear metiers.

The inshore drift netting scientific trial should be guided by clearly defined objectives, with a strong emphasis on eliminating bycatch of sensitive species. It should be targeted in regions where fishers currently have no viable alternative to fixed gillnet authorised gear, ensuring that the trial offers a practical and environmentally responsible option and conducted in comparison to other gear metiers.

Benefits

1. Legislation and policy

- This recommendation would be consistent with multiple goals of the Bass Fisheries Management Plan (FMP), including maximising benefits for coastal communities (Goal 5), ensuring sustainable harvesting based on scientific advice (Goal 6), minimising discards in mixed fisheries (Goal 3), improving monitoring of sensitive species bycatch (Goal 8.1), and reducing seabed impact and ghost fishing (Goal 8.2).

- This would be consistent with obligations under the [Fisheries Act 2020](#) specifically the **national benefit objective** in that fishing activities of UK fishing boats bring social or economic benefits to the United Kingdom.
- Delivering in line with [MMO strategic goals](#) specifically, **Goal 6 - Assure the sustainable and transparent management of fishing opportunities to achieve a resilient and increasingly viable fishing sector.**

2. Stock and Data

- Increased data collection to support stock assessments and the ability to understand the stock at a regional level, assisting fisheries managers in decision making and aligning with **Recommendation 2. Analysis of data to identify fishing opportunity.**
- Development of a selective and sustainable fishery aligning with **Recommendation 20. Develop a hook-to-plate accreditation for the bass fishery.**

3. Fishing opportunity

- Providing small scale inshore fishers with an additional fishing opportunity.
- Boosting income for fishers, processors, and coastal communities.
- Legal access to the fishery could reduce illegal, unreported and unregulated fishing.

4. Enforcement and Compliance

- Engaging and collaborating with commercial fishing stakeholders can encourage compliance and therefore reduce the enforcement resource burden.

Risks

1. No Action

- The government could fail to be consistent with obligations under the [Fisheries Act 2020](#) specifically the **National benefit objective, *fishing activities of UK fishing boats bring social or economic benefits to the United Kingdom or any part of the United Kingdom.*** Anecdotal information gained during stakeholder meetings suggests that the bass stock is changing and moving into areas where it has previously not been seen, with the potential for increased social and economic benefits at a regional level.

- The government could fail to be consistent under the [Bass Fisheries Management Plan \(FMP\)](#) specifically alignment with **Goal 5: *Maximise the benefits of bass fishing for local coastal communities.***

2. Enforcement and compliance

- The targeting of bass aggregations by some gill netters has been raised in the subgroup and wider engagement meetings including the enforcement difficulties.
- Ensuring that nets are used only within trial parameters could require intensive monitoring with the use of REM or observers, creating a financial and resource burden.

3. Legislation and policy

- Drift netting is not legislated as a permitted gear in the bass fishery and therefore a scientific inshore drift netting trial may require either a specific scientific dispensation, legislative amendments or policy change.

4. Stock and Data

- Drift netting is an effective fishing method that could be utilised to target bass aggregations, resulting in increased removals and impacting other fishing sectors.
- Discard data is poor, particularly around seal predated fish. This lack of data could affect the justification for a trial where seal depredation is cited as a key rationale.

5. Administration and resource

- The creation of an appropriately managed trial would require significant resource across many stakeholder groups.
- The process of identifying trial participants could be complicated and contentious. Many stakeholders around the coast raised an interest in trial participation.

6. Environment

- A drift netting trial could produce gear conflicts with recreational anglers, other commercial fishers, and marine tourism operators.
- A drift netting trial could without the necessary safeguards may negatively increase the targeting of seasonal aggregations of bass.

- Additional authorisations provided to fishers not currently undertaking a mixed fishery with regards to netting and discards could create wider environmental implications, particularly if the use of gears associated with a risk to species such as seabirds and marine mammals is increased.

7. Reputational

- Drift netting has a controversial reputation due to its historical association with targeting of aggregations and high rates of sensitive species bycatch.
- Recreational anglers and conservation groups oppose drift netting due to its potential impact on bass stocks, cross sector fishing opportunities and sensitive species. A trial if not conducted effectively could lead to public scrutiny and reduced trust in fisheries management.

Implementation and Mitigation

1. Define trial objectives and design including the specific aim of the trial, scientific and policy goals.
 - Identify and consult with stakeholders.
 - Identify duration and location of the trial.
 - Scientific oversight including consideration of recommendations in [The Bycatch Mitigation Hub](#).
 - Identify participants.
 - Communication and transparency.
 - Technical measures should include monitoring of deployed gear (net attendance), limits on soak times and gear length, along with spatial and temporal restrictions tailored to the specific sensitivities of local protected and vulnerable species of birds and marine mammals.
 - Develop monitoring process through observers or REM.
 - Evaluation.
2. To satisfy targeting, misreporting, enforcement concerns and to be consistent with obligations under **Goal 8.1** of the [Bass Fisheries Management Plan \(FMP\)](#) to ***Improve monitoring and better understand sensitive species bycatch in bass fisheries***, a trial should only proceed providing there is effective and appropriate monitoring on participating vessels.
3. To be consistent with obligations under the [UK Marine Strategy](#). Specifically, **D1 and D4 where the viability of marine bird populations, cetaceans and seals are not threatened from incidental bycatch catch**. Trial parameters and technical conservation measures must be designed in collaboration with appropriate stakeholders and with consideration to recommendations in [The Bycatch Mitigation Hub](#) including temporal and spatial restrictions.

4. To be consistent with obligations under **Goal 6** of the [Environmental Improvement Plan](#) ***to ensure that fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield and to reduce negative ecosystem impacts***. Any trial must be adequately based on scientific advice with consideration of the risk to species such as seabirds and marine mammals.
5. Drift netting is not a permitted gear type in the bass fishery therefore to enable a trial it will require legislative exemptions in terms of scientific dispensation and policy decisions.
6. Currently the lack of data and evidence, other than anecdotal reflecting the impact of seal depredation and discards is limited. To provide justification for a trial where discards from seal predated fish is cited then discard reporting will need to be improved, this can be achieved through communication and discard reporting trials (**Recommendation 21. Improved communication and provide incentives for discard recording**) and potential changes to the catch app (**Recommendation 22. Consider amendments to the Catch App**).
7. Participants for a drift netting trial should be selected from fishers that are fixed gillnet authorised and undertaking a mixed fishery with regards to netting, therefore mitigating environmental implications of increasing the number of nets in the fishery and the resulting impact on sensitive species bycatch.
8. The trial must be carefully designed to minimise gear conflicts with recreational anglers, other commercial fishers, and marine tourism operators, incorporating a structured approach that includes spatial separation measures.
9. Recognising the public interest that is likely to evolve from an inshore drift netting scientific trial, transparency and communication will be important to highlight rationale, risks and mitigation.
10. To be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) **Goal 5: *Maximise the benefits of bass fishing for local coastal communities***. Monitoring and consideration should be given to reduced landings and sector conflict from the impact of any increased fishing pressure, including recreational fisheries, charter vessels, other commercial fishers and coastal communities.

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**.

Table 5 below shows the dependencies associated with the recommendation for an inshore drift netting scientific trial and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.
- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.
-

Table 5: Dependencies

Recommendation		Type	Dependency
5	Implementation of a Limited regional inshore Drift Netting scientific Trial	External dependency Scientific advice	Recommendation 2. Analysis of data to identify fishing opportunity. Additional. Fishing opportunity should be allocated in accordance with scientific advice
		External dependency Compliance assurances	Effective monitoring of a trial for example through REM and observers
		Internal dependency Implementation options	The use of appropriate mitigants listed to reduce the risks identified in an inshore drift netting scientific trial.
		Discretionary dependency Eligibility criteria	The eligibility criteria require fairness and transparency.
		External dependency Trial parameters	Trial parameters and technical conservation measures should be designed in collaboration with appropriate stakeholders
		Mandatory Dependencies Legislation and Policy	Scientific dispensation, legislative or policy change
		External dependency Evaluation	Appropriate scientific evaluation resource should be identified
		External dependency Cost and resource	Identification of resource availability and funding

9. Gear

This aspect of the review focused on gear types with the following considerations:

1. How do we balance accessibility to the fishery with sustainability?
2. Consider allowing fishers with relevant authorisations the option to switch from using fixed nets to hook and line gears associated with a lower risk of sensitive species bycatch.
3. Consideration of one type of entitlement - either, trawl and seine or fixed gill nets or rod and line, not both – requirement for vessels to state which one they are using when going out to fish and only having that on board.
4. Trawls and seines – no entitlement needed yet have an allocated per trip bycatch of 10% is this suitable – Is it the right approach that trawls and seines not be included?

During the analysis phase of the bass authorisation review process broader opportunities were identified either from the authorisation review subgroup or from stakeholder engagement events, each of these broader opportunities were analysed for their strengths, weaknesses, and risks. Where relevant recommendations arising from broader opportunities are included in this section.

Background

Currently and providing they have a bass authorisation commercial fishers are only permitted to catch and retain bass as a bycatch using fixed gillnet and with hook and line as the only targeted bass fishery

Authorised vessels can only retain and land bass subject to the landing limits below (2025).

- Hook and line 6.8 tonnes per year.
- Fixed gillnet by-catch of 1.8 tonnes per year.

Under [Council Regulation \(EU\) 2020/123](#) and amended through [The Sea Fisheries \(Amendment\) \(No. 2\) Regulations 2021](#) all commercial fishing vessels are now authorised to land bass bycatch by demersal trawls and seines and no written authorisation is required.

It is important to note however that bass caught using trawls and seines remain subject to a 10% by weight of all marine organisms per trip. An unavoidable by-catch landing limit of 3.8 tonnes (3800kg) per vessel per year.

If commercial fishers want to catch and retain bass by other gears, they must have a written authorisation from the MMO to do so.

Once commercial fishermen have been issued an authorisation they will be authorised to catch and retain bass with the gear types listed on the authorisation, subject to the specific limitations for each gear type.

Analysis

Summary

During the authorisation review meetings, the group explored strategies to mitigate the bycatch of sensitive species, aligning with **Goal 8.1** of the [Bass Fisheries Management Plan \(FMP\)](#), which aims to minimise or eliminate such bycatch. A short-term objective identified under this goal is to provide fishers holding relevant authorisations the opportunity to transition from fixed gill nets to hook and line gear, which is associated with a lower risk of sensitive species bycatch.

Following analysis, the group recommended that the option to switch from fixed gill net to hook and line could be offered to:

- Fishers currently authorised to use fixed gill nets for bycatch.
- Commercial fishers entering the bass fishery enabled by **Recommendation 1**, which removes the track record requirement and creates additional fishing opportunity.
- Commercial fishers acquiring authorisations through vessel transfers.

Commercial fishing stakeholders highlighted that fixed gillnet authorisations function as a bycatch fishery. They noted that unauthorised commercial fishers may still use nets as part of mixed fishery and as such may present a risk as to the motivation for switching to gain a higher landing limit. Some regional variations e.g. water clarity would make it impossible for fishers to use hook and line and in certain areas this would not be a viable commercial option.

Recreational sector representatives further suggested that promoting a transition to hook and line could support the development of a more selective and sustainable fishery. They proposed the potential for a “hook-to-plate” accreditation scheme (**Recommendation 20**), which could enhance product traceability, increase market value, and deliver economic benefits to coastal communities.

During subgroup discussions and broader stakeholder engagement, the concept of allowing non-authorised fixed gill net fishers to land bass as bycatch within a defined limit was explored. The group identified that such an approach could help reduce discards, provide some limited economic support to fishers, and contribute valuable scientific data on regional stock movements. As a result, a trial implementation of a two-fish daily bycatch allowance for non-authorised fixed gill net fishers was recommended, with the aim of encouraging discard reporting and data collection. However, this proposal did not receive full consensus, with some recreational representatives expressing concerns about the potential for targeting aggregations and misreporting, with RSPB representatives indicating that the measure could increase the impact on sensitive species bycatch.

The group also reviewed the current policy that permits all commercial vessels to land bass bycatch from demersal trawls and seines without requiring written

authorisation. It was agreed that this approach remains appropriate. Nonetheless, concerns were raised regarding the complexity of catch composition in these fisheries. Consequently, the group recommended establishing a dedicated working group to further examine the demersal trawls and seines in the bass fishery (**Recommendation 9**).

Finally, the group considered the possibility of removing dual gear authorisations in favour of a single gear entitlement. However, no recommendation was made due to concerns from the commercial fishing representation about the potential impact on the inshore fleet, which often relies on the flexibility of dual authorisations (fixed gillnet bycatch and hook and line) to adapt to changing environmental conditions and seasonal variations. Recreational participants voiced disagreement, citing the risk of misreporting gear type and the potential for targeting bass aggregations under dual authorisations. This discussion identified a series of options to mitigate these concerns listed as recommendations in **section 9** of this report **Compliance and Enforcement**, for example a recommendation to prioritise the use of REM for vessels identified as high risk.

Stakeholder engagement

In many areas visited during the stakeholder engagement events participants reported bass abundance and requested other fishing opportunities including the consideration of bycatch allowances for other gear types. Commercial fishing stakeholders also indicated a willingness to support any opportunity for them to assist in data collection to improve the stock picture at a regional level and advocated for the fixed gillnet bycatch element to become a targeted fishery.

1. Should we allow fishers to switch from fixed net authorisation to hook and line?

Out of the 20 stakeholder engagement events conducted, 12 expressed support for allowing fishers to exchange their fixed gillnet authorisation for hook and line. This support was based on the recognition that such a measure provides flexibility, enabling fishers to make choices aligned with their individual circumstances and fishing practices. Six events resulted in no clear consensus, while one event held in the Northwest region opposed the proposal. During the online session aimed at recreational fishers, participants raised the need for safeguards to ensure the integrity of the measure. They emphasised the importance of verifying the motivations behind such gear changes, citing a potential risk of misreporting gear type.

2. Should we allow all non-authorised fixed gillnet fishers to land bass within an allowance?

At 17 of the 20 stakeholder engagement events, participants expressed support for the recommendation, with several suggesting that similar considerations could be extended to other gear types in the future. One event held in the South emphasised that the measure would not establish a new fishery or entitlement, but rather contribute to reducing discards, based on the assumption that participating fishers would already be using gillnets for other target species and currently discarding bass.

In contrast, one venue in the Northwest opposed the recommendation, citing concerns that increased landings could negatively impact market prices. During the online session aimed at recreational fishers, a participant questioned the potential benefit to the bass stock, arguing that the measure could increase illegal netting due to existing enforcement challenges. It was also suggested that if implemented aligning any proposed bycatch allowance with the recreational limit would promote fairness across sectors.

3. Should there be only one type of gear entitlement?

Participants at 16 events opposed the removal of dual authorisations, while acknowledging concerns around potential misreporting. They emphasised that such issues should be addressed through effective enforcement rather than by limiting options. Participants highlighted that removing dual authorisations would reduce flexibility, particularly for those engaged in mixed fisheries. These fishers often rely on the ability to choose between gear types based on prevailing conditions and fishing opportunities. At four events, participants did not reach a definitive conclusion on the subject.

Recommendations

Recommendation 6: Allow the switch from fixed gillnet authorisation to hook and line.

This recommendation would allow fishers currently fixed gillnet authorised the opportunity to transition to a hook and line authorisation. This opportunity originates from the scope of the authorisation review and the short-term objective of **Goal 8.1** in the [Bass Fisheries Management Plan \(FMP\)](#). This goal seeks to reduce discards and the bycatch of sensitive species by enabling fishers with relevant authorisations to adopt hook and line gear that poses a lower risk to sensitive species.

In evaluating this proposal, the authorisation review subgroup considered opportunities to support the reduction of sensitive species bycatch through transition to a hook and line fishery, including allowing the switch from fixed gillnet authorisation to hook and line in the following cases:

1. Fishers currently authorised to land bass as bycatch from fixed gillnets wishing to transition fully to hook and line with no risk of bycatch and therefore discards occurring from other fishing practice.
2. A fixed gillnet authorised fisher who lands bass as bycatch, wishing to transition to hook and line gear but continues to use nets as part of a mixed fishery, any bass caught in those nets would therefore become subject to discard.
Under these circumstances fishers would be permitted to land bass caught both by fixed gillnets and by hook and line, under a single, combined landing limit as applied to fixed gillnet authorisations.

3. Commercial fishers acquiring fixed gillnet authorisations through vessel transfers would be given the option to switch to a hook and line gear.

An example of how this recommendation could benefit inshore small-scale fishers is illustrated by a message received from a commercial fisher who was not part of the authorisation review process.

“As a commercial fisherman with netted bass entitlement I would like to see the opportunity to swap it for hook and line with the same catch limit as the gillnets, I think it would be a great opportunity to fish sustainably whilst not losing the financial benefits that contribute to small fishers like myself. It would be a great way to promote sustainably for all parties involved”.

Benefits

- Provides the opportunity to control the type of authorisations by gear type and supports the transition to gears associated with a lower risk of sensitive species bycatch.
- Contributes towards meeting **Goal 8.1** of the [Bass Fisheries Management Plan \(FMP\)](#) **reduction of sensitive species bycatch**. Allowing the switch to hook and line gears supports the approach in those cases where fishers are not undertaking a mixed fishery in relation to fixed gillnets.
- This measure recognises the hook and line fishery as the only targeted fishery and supports the recognition of selective and low impact methods of fishing alongside the development of an accredited fishery (**Recommendation 20**).
- This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 3: Minimise discarding of bass bycatch where survival rates are low**. In cases where commercial fishers that transition are not undertaking a mixed fishery in terms of fixed gillnets.
- This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 5: Maximise the benefits of bass fishing for local coastal communities**. Providing benefit to fishers at a regional level where hook and line gear may be a more appropriate fishing method.
- It was generally considered that the risk of individuals making the transition to misreport through the greater landing limit would be low.
- The higher landing limit associated with switching to hook and line is unlikely to result in a significant increase in overall removals, unless the fisher becomes a dedicated specialist hook and line fisher.
- Fishers would make the decision on balance, whether it was useful geographically or if they wanted to be more of a hook and line specialist.

Risks

- Fixed gill net authorisations function as a bycatch fishery. Commercial fishers opting to switch from fixed gillnet to hook and line may still use nets as part of mixed fishery and as such discards could increase.
- The motivation for switching authorised gear type may not be clear and presents a risk that fishers may take advantage of the higher landing limit to misreport by gear type.
- Removing a net authorisation does not necessarily mean that bass mortality will be lowered.
- There is no direct net fishery for bass and therefore this recommendation does not limit netters for other species and therefore may not support the reduction of discard and sensitive species bycatch.
- Implementing this option may create several tiers of authorisation and therefore increase the compliance and resource burden.

Implementation and Mitigation

- Each request to transition from fixed gillnet to hook and line authorisation must be assessed to establish the impact on discards in each circumstance.
- Where there is no risk of continued participation in netted fisheries for other species and therefore no risk of bycatch or discards, commercial fishers currently authorised to land bass as bycatch from fixed gillnets should be permitted to fully transition to hook and line gear.
- If a fixed gillnet authorised fisher who lands bass as bycatch, chooses to transition to hook and line gears but continues to use nets as part of a mixed fishery, any bass caught in those nets would be subject to discard.
To reduce the discard impact in such cases, it is proposed that these fishers be permitted to land bass caught both by fixed gillnets and by hook and line, under a single combined landing limit as applied to fixed gillnet authorisations. This could be applied through a transitional period to allow fishers time to adjust.
- To support this recommendation, consider the development of an accreditation scheme for hook and line authorised fishers which could enhance product traceability, increase market value, and deliver economic benefits to coastal communities (**Recommendation 20**).
- Mitigate concerns of misreporting by gear type through the implementation of recommendations in **Section 9, Compliance and Enforcement**.

- Further research is required to establish potential uptake this could be achieved in the form of an online survey.
- Further research is required to establish the compliance and administrative resource burden.

Recommendation 7: Trial bycatch allowance for all non-authorised fixed gillnet fishers.

The concept of allowing all non-authorised fixed gill net fishers to land bass as bycatch within a defined limit was proposed for analysis through identification of broader opportunities by subgroup members from the commercial fishing sector, and during stakeholder engagement events by commercial fishers.

It was suggested that such an approach could help reduce discards, provide some limited economic support to fishers, and contribute valuable scientific data on regional stock movements.

As a result, it is recommended that a two-fish daily bycatch allowance for non-authorised fixed gill net fishers is considered, with the aim of encouraging discard reporting and data collection.

It was proposed that this would be conducted as a trial, aligning the trial with current minimum size and closed period with scientific support. Concerns around targeting and misreporting should again be mitigated with changes to the Catch App and the use of electronic monitoring.

Concerns were raised by RSPB about the potential for fishers to increase the number of nets deployed in order to exploit the bycatch allowance. However, these concerns were considered unfounded, as the effort and cost required would not be justified by the limited return of a two-fish daily allowance.

Benefits

- This recommendation allows non authorised vessels that are fishing for other species to land limited incidental catches of bass.
- This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 5: *Maximise the benefits of bass fishing for local coastal communities.*** Allowing non-authorised commercial fishers to land bass that would otherwise be discarded provides some small economic benefit.
- This would be consistent with a short term goal within **Goal 6: [Bass Fisheries Management Plan \(FMP\)](#)** including: ***To fill evidence gaps required for improved stock assessments, including additional data on levels of discarding in the commercial sector.*** By encouraging participants in this trial to record discard data and provide evidence of regional stock movement to scientists and regulators.

- This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 3: Minimise discarding of bass bycatch**, in order to improve data collection for better management of discarding.
- Assists in the exploration of how following the implementation of emergency bass measures the bass fishery can progress to a more normal situation through improved data collection.
- Aligns with recreational daily bag limit promoting fairness and consistency across sectors.
- Minimal resource burden as enforcement would form part of routine inspections. Some administration may be required for investigations, but this would be outweighed by the benefit of data.
- This would be consistent with practice employed in other fisheries for example shellfish.

Risks

- The potential for fishers to increase the number of nets deployed in order to exploit the bycatch allowance has been raised as a possible risk, this could fail to be consistent with **Goal 8.1** of the [Bass Fisheries Management Plan \(FMP\)](#) with regards to the reduction of **sensitive species bycatch**. However, through analysis, these concerns were considered unfounded, as the effort and cost required would not be justified by the limited return of a two-fish daily allowance.
- There is currently no bycatch definition for bass caught in fixed gillnets.
- This recommendation allows the landing of bass as bycatch that would otherwise be discarded therefore has no impact on mortality.
- A regulated approach could reduce illegal, unreported and unregulated fishing.
- The uptake for this measure is unknown and therefore the impact on market value cannot be predicted.
- This focus on commercial netters could be seen as discriminatory towards recreational fishers wishing to land bass by nets.

Implementation and Mitigation

- Provide assurances that this recommendation will not lead to an increase in the number of nets deployed, which could in turn elevate the risk of discards and bycatch of sensitive species. Further research is needed to determine whether the potential benefits justify any additional cost and effort required from fishers to deploy nets.

- Trial would be conducted in line with recommendations for discard reporting (**Section 10**) and conducted in such a way to allow monitoring of the impact of uptake and landings.
- Conducted at a regional level with key individuals from the fishing community and scientific support.
- Ensure that the bycatch amount of two fish is defined to prevent targeting.

Recommendation 8: Demersal trawls and seines should remain excluded from the requirement to have a bass authorisation

This recommendation stems from the scope of the authorisation review to consider if it is the correct approach for trawls and seines not to be included in the requirement to have an authorisation. Through analysis the subgroup established that it was the correct approach.

Recommendation 9: Establish a demersal trawls and seines working group

The authorisation review subgroup members and engagement with commercial fishing stakeholders highlighted the complexity of issues related to regulations, discards, and catch composition. Issues were raised regarding bycatch, discards and the reputational risks to both the fishing industry and regulators associated with discarding.

It was indicated by commercial fishing representation that these matters extended beyond the scope and available time of the bass authorisation review. As a result, it was agreed for a recommendation that a dedicated task and finish group be established to specifically review demersal trawls and seines in the bass fishery.

Stakeholder feedback identified both strengths and weaknesses of the trawl fishery in relation to bass. Key concerns included the significant impact on non-target species, which are often landed solely to meet catch composition requirements, the environmental and reputational damage caused when large volumes of low-value fish and other marine organisms are landed, or substantial quantities of bass are discarded.

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**

Table 6 below shows the dependencies associated with this recommendation and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.

- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.

Table 6: Dependencies

Recommendation		Type	Dependency
6	Allow the switch from fixed gillnet authorisation to hook and line.	External dependency Fishing opportunity	Recommendation 1 creation of fishing opportunity that allows commercial fishers to enter the bass fishery
		External dependency Compliance assurances	Compliance and enforcement assurances (Section 9)
		Discretionary dependency	Identify the impact on discards in each circumstance
		External dependency	Identify resource burden
7	Bycatch allowance for all non-authorised fixed gillnet fishers.	External dependency Research	Research to establish if the cost benefit justifies the effort required by fishers to provide assurances that nets are not increased
		External dependency Discards	Align with discard reporting Recommendation 21 and 22
		External dependency Compliance assurances	Compliance and enforcement assurances Section 9
8	Demersal trawls and seines should remain not included in the requirement to have a bass authorisation	None	None
9	Establish a demersal trawls and seines working group	External dependency Prioritisation	Bass Management Group resource and prioritisation consideration

10. Transfer of authorisations

The review of the transfer of authorisations process and regulation focused primarily on the following considerations.

1. Could we allow bass authorisation to be held on licence entitlements and transfer that way to a new vessel?
2. Do we need to prevent increases on engine power and tonnage?
3. Could we allow aggregation of licence entitlements as it would reduce the number of vessels?
4. Could we allow the U8m exemption where an intended replacement vessel must be a monohull to all U8m vessels including catamarans?

During analysis of the transfer of authorisations process and regulations in the subgroup and wider engagement meetings, broader opportunities were identified, each of these broader opportunities were analysed for their strengths, weaknesses, and risks. Where relevant recommendations arising from broader opportunities relating to the transfer of authorisations are included in this section.

Background

Commercial fishing vessels that demonstrated a track record of landing bass during the reference period of 1 July 2015 to 30 September 2016 were eligible to obtain a bass authorisation. These authorisations are issued by gear type linked directly to the vessel hull.

Linking the authorisation to the vessel aimed to ensure that fishing pressure did not exceed desired levels of fishing capacity limiting engine power, tonnage and the number of vessels in the fleet, and aligning with legislative requirements of the [Council Regulation \(EU\) 2020/123](#).

In specific cases commercial fishermen can transfer the authorisation between vessels provided that the replacement vessel does not exceed the original in engine size or tonnage, and the total number of vessels in the fleet does not increase.

However, vessels with a single hull and an overall length of 8 metres or less are exempt from the engine size and tonnage restrictions under the [Council Regulation \(EU\) 2020/123](#) and amended by [The Sea Fisheries Amendment Regulations 2021](#).

This exemption recognises that newer vessels in this size category often have slightly greater capacity and power, and allows owners to upgrade to safer, more modern vessels without having the unintended consequence on that individual of losing their bass authorisation.

Enforcement advice was that minor capacity changes between vessels in this size category of single hulled vessels would not create additional fishing pressure or the

potential for increased uptake of catch limits and therefore impacting the bass management objectives.

- **Vessel Replacement and transfer of authorisation.**

Transfers between two vessels in your ownership. Vessel owners wishing to transfer an existing authorisation in their name to a replacement (new build or newly purchased) vessel have a responsibility to seek relevant approvals from the MMO prior to making any commitments.

No transfer of a bass authorisation will be processed until the new vessel has been registered and licensed by MMO.

Owners intending to sell vessels being replaced should also make the purchaser aware that the vessel being sold will lose its authorisation once the transfer is completed. It is also recommended that purchasers confirm that the vessel has any authorisations required before finalising a purchase.

Transfer of a bass authorisation when a vessel is sold. With bass authorisations being linked to the vessel they do not transfer with a fishing vessel licence. Authorisations will transfer to the new owner of the vessel when the ownership of the vessel is transferred.

It is important to note that the catch uptake by that vessel will also be transferred, the catch limits will not be reset.

- **Aggregation.**

Aggregation refers to the process of combining multiple fishing licence entitlements to meet the requirements of a new or replacement vessel and is not currently a mechanism for transferring bass authorisations. This means fishers cannot freely combine multiple authorisations to create a new one for a different vessel.

Analysis

Summary

Analysis of the rules governing the transfer of bass authorisations between vessels revealed that many current regulations impose unnecessary constraints on commercial fishers. Specifically, the rules significantly limit the pool of eligible vessels based on the characteristics of certain fishing areas. This makes it difficult for fishers to expand or diversify their operations, as attempting to transfer a bass authorisation to a vessel with higher engine power could result in them losing the bass authorisation.

The group examined the relevance of engine power restrictions within the bass fleet. It was agreed that, aside from trawlers, there is little correlation between engine power and fishing capacity for fixed gillnet and hook and line gears. Since landing limits already regulate fishing effort, the group questioned the necessity of these power-based restrictions and recommended that some flexibility be introduced to allow limited size and power increases across the fleet.

The topic of aggregation was also discussed. Commercial representatives noted that finding a perfectly matching licence is often challenging, and aggregation is sometimes necessary, not to increase capacity, but simply to obtain a suitable licence. However, allowing aggregation of bass authorisations could further limit fishing opportunities by concentrating authorisations among larger vessels. The group ultimately recommended maintaining the current restriction on aggregation due to these risks.

The group also discussed the under 8 metre vessel size and power exemptions, acknowledging its importance for the inshore fleet, especially as vessels age and Maritime and Coastguard Agency (MCA) safety standards evolve. The exemption currently applies only to monohulls. While monohulls have less carrying capacity than catamarans, catamarans offer greater stability and weather resilience, potentially allowing more days at sea. The group recommended continuing the exemption for monohulls but noted some disagreement. Some commercial fishers argued that catamarans should not be excluded, as their advantages in safety and usability should not be seen as giving them unfair advantage.

Recreational sector representatives proposed that bass authorisations should not be transferable upon vessel sale, arguing that these rights are a public resource granted at no cost and should not inflate vessel value. However, the group did not reach consensus on whether this approach would help manage the fleet or simply devalue vessels. As with previous discussions on track records, it was acknowledged that financial barriers remain for new entrants into the bass fishery. As a result of the lack of consensus, it was concluded that subject to **Recommendation 1 (removal of the track record process)** any fishers taking advantage of the availability of any new authorisations would not be allowed to transfer an authorisation when a vessel is sold.

Stakeholder engagement

During engagement meetings many stakeholders indicated that except for trawlers there is minimal correlation between engine power and fishing capacity, they stated that existing landing limits serve as a primary mechanism to restrict fishing effort and that an aging fleet presents challenges for vessel replacement, particularly in matching new vessels to existing licence specifications. Stakeholders proposed that to address this, introducing limited flexibility for increases in engine power and tonnage could support improvements in vessel safety, alignment with modern fishing practices, and fleet modernization.

It was argued that allowing unrestricted increases in power and vessels size may lead to the displacement of fishing activity into other areas due to the increase capacity and stability, potentially causing ecological impacts to the environment or economic impacts to other sectors.

Furthermore, reliance on landing limits alone was not thought to be a sustainable strategy for managing fishing effort. Larger vessels equipped with more horsepower can undertake more trips per day and accommodate additional crew, enhancing efficiency.

Unlimited allowances for engine power and tonnage increases would also provide uncertainty in landings and therefore impact stock management.

Participants emphasised the restrictions that the transfer rules place on commercial fishers wishing to improve or diversify, adding that the restriction on engine power and tonnage doesn't always align with MCA rules, also highlighting that rules can be confusing and could benefit from improved communication and guidance.

1. Could we allow bass authorisation to be held on licence entitlements and transfer that way to a new vessel?

Out of 20 stakeholder engagement events, participants at five meetings supported the idea of allowing bass authorisations to be held on licence entitlements rather than being tied to vessel hulls. They cited challenges such as restrictions on transfers between family members and barriers to progression within the fishing industry. Twelve events reached no clear conclusion, while participants at three events opposed the idea. These groups preferred keeping authorisations linked to the vessel hull but acknowledged that the current rules should be simplified.

2. Do we need to prevent increases on engine power and tonnage?

At 17 of the 20 stakeholder events, participants expressed that increases in engine power and tonnage in the hook and line and fixed gillnet fisheries should not be restricted. They argued that such restrictions hinder diversification across fisheries and have limited relevance to actual fishing effort, it was however recognised that the ability to upgrade vessels with no restriction would enable the catch limit to be reached quicker with the potential for increasing discards. Three venues reached no conclusion.

3. Could we allow the under 8 metre exemption where an intended replacement vessel must be a monohull to all under 8 metre vessels including catamarans?

Participants at 14 of the 20 events supported extending the under 8m exemption to include catamarans. They questioned the need for exclusion, especially given that catch limits already regulate fishing effort. Four events in the East and South East regions did not reach a conclusion, noting both advantages and disadvantages of catamarans, while also highlighting natural effort controls such as weather and operational costs. In contrast, meetings held in the Northwest and online event aimed at recreational fishers expressed opposition, citing concerns over the increased capacity and fishing effort potentially associated with catamarans.

Recommendations

Recommendation 10: Authorisations to remain attached to the vessel hull

Analysis of whether the authorisation should be attached to a fishing vessel licence, an individual or the vessel concluded with the recommendation that the authorisation should remain attached to the vessel hull. This primarily supports management of the stock by continuing to restrict excessive increases in capacity and therefore effort.

There is currently no mechanism to add bass authorisations to fishing vessel licences as this would Add further complexity to an already significantly complex document.

Benefits

- This would be consistent with the legislative requirements under [Council Regulation \(EU\) 2020/123](#) In terms of fishing capacity.
- Retaining the authorisation on the vessel hull assists in making the transfer process simple, particularly when transferring between vessels in the same ownership.

Risks

- Tying authorisations to specific vessel hulls restricts fishers ability to upgrade or replace vessels due to fear of losing bass fishing rights (over 8 metre vessels).
- Rigidity in transfers can hinder generational succession within fishing families and limit adaptation to modern safety standards.

Implementation and Mitigation

- Clarification and communication of the process to be used when transferring an authorisation to a new vessel is recommended, specifically where the owner does not have to have both vessels at the same time, but the authorisation can be retained until the new vessel is purchased and licensed. The bass guidance has recently been amended to simplify the transfer process information.
- Formalise MMO bass authorisation retention policy when there are delays in replacing a vessel.
- **Recommendation 11**, which permits limited increases in engine power and vessel size, helps to mitigate transfer rigidity.

Recommendation 11: Allow limited increase in engine power and vessel size.

Provide flexibility in the transfer process to all bass authorised vessels. Allow limited engine power and vessel size increases for vessels authorised to land bass by hook and line and fixed gillnet as bycatch.

Benefits

- Added flexibility to allow limited increases in engine power and vessel size allows fishers to keep up with technological improvements and safety, allowing diversification of fishing practice and modernisation of vessels.

- This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 5: Maximise the benefits of bass fishing for local coastal communities**, by providing improved fishing opportunity at a regional level allowing fishers greater flexibility to diversify and improve.
- Many fishers operate within a mixed fishery. This recommendation helps mitigate the risk of losing a bass authorisation by providing flexibility should their mixed fishery approach require upgrading or replacing their vessel with one of a different size or power.

Risks

- Reliance on catch limits alone would not be a viable way of managing effort, allowing increases to larger vessels with more horsepower could allow a vessel to do more trips in a day and carry more crew, fishing through more adverse weather conditions.
- Allowing larger vessels to increase capacity by engine power and size may mean they could reach catch limits faster with an unintended consequence of overfishing and effort creep.
- Allowing limited increase in vessel size and power would require changes to bass guidance, rules and legislation.
- Additional MMO resource would be required to manage and monitor changes.
- The level of increase in engine power and tonnage is yet to be determined and therefore the impact on the stock is unknown.
- Increase fishing capacity through this flexibility could increase the risk of targeting of bass aggregations and displacement of effort into other fishing areas.
- This could fail to be consistent with the legislative requirements under [Council Regulation \(EU\) 2020/123](#) In terms of fishing capacity where the number of authorised United Kingdom fishing vessels and overall fishing capacity does not increase.

Implementation and Mitigation

- The level of increase in engine power and tonnage has not been determined during the analysis phase and therefore the impact on the stock is unknown. Research of fleet characteristics is required to identify the appropriate flexibility in terms of engine power and vessel size increases.
- **Recommendation 1** outlines the potential response to any activation of latent capacity. As with this recommendation, fisheries managers may need the ability to respond to stock fluctuations and unsustainable increases in landings.

- Legislative requirements under [Council Regulation \(EU\) 2020/123](#) states that in the case of a replacement of a United Kingdom fishing vessel, a fisheries administration may allow the derogation (bass authorisation) to apply to another fishing vessel provided that the number of United Kingdom fishing vessels subject to a bass authorisation and their overall fishing capacity do not increase. Therefore, to introduce greater flexibility, particularly in cases involving different vessel types or capacity changes, amendments to the legislation will be necessary.

Recommendation 12: Retain the current under 8 metre exemption to monohull.

Retain the current under 8 metre exemption where replacement vessel must be monohull. This is due to difference in capacity of catamarans where it was considered that the advantages in stability and useability would give an unfair advantage in the under 8 metre fleet.

While monohulls have less carrying capacity than catamarans, catamarans weather resilience could allow more days at sea, however stakeholders questioned the need for exclusion, especially given that catch limits already exist to regulate fishing effort and since there is no directed bass fishery using gillnets the current rules hinder those employed in a mixed fishery.

Benefits

- Prevents excessive capacity and effort increases in the under 8 metre fleet.

Risks

- This recommendation is contradictory to **recommendation 11** that allows limited increases in engine power and vessel size across the fleet.
- Allowing vessel size and power increases (**recommendation 11**) could disadvantage those wishing to upgrade to catamaran within the under 8 metre fleet. Justification will be needed to highlight the risk of including catamaran in the under 8 metre exemption compared to allowing limited increase in size and engine power across the entire fleet.
- Creates a very small pool of potential available vessels in relation to the characteristics of the specific fishing area.
- The advantages of catamarans in safety and usability should not be seen as giving them unfair advantage, especially since there is no directed bass fishery using gillnets.
- Creates additional administrative burden with different regulations for different vessels.

Implementation and Mitigation

- If **Recommendation 11** is adopted, permitting limited increases in engine power and vessel size for vessels authorised to fish with hook and line or fixed gillnets, catamarans would become the only vessel type excluded from transferring authorisations between vessels of differing size and power (capacity).

To ensure fairness and consistency, further research is needed to determine whether transferring an authorisation from an under 8m monohull to an under 8m catamaran would result in a disproportionate increase in capacity compared to the limited increases permitted under **Recommendation 11**.

- [Council Regulation \(EU\) 2020/123](#) provides that when a UK fishing vessel is replaced, a fisheries administration may permit the bass authorisation (derogation) to be transferred to another vessel, provided that the total number of UK vessels holding the authorisation and their combined fishing capacity do not increase.

For replacement vessels that are 8 metres or less in overall length and have a single hull, the regulation allows an assumption that the new vessel's gross tonnage and engine power are no greater than those of the vessel it replaces. If the outcome of research indicates that in the interest of fairness catamarans may be included in the exemption, then amendments to the legislation will be necessary.

Recommendation 13: Retain the restriction on aggregations

Aggregation refers to the process of combining multiple fishing licence or entitlements to meet the requirements of a new or replacement vessel and is not currently a mechanism for transferring bass authorisations. This means fishers cannot freely combine multiple authorisations to create a new one for a different vessel.

This recommendation is to retain the restriction of aggregations due to weaknesses; aggregation of authorised vessels would further limit the number of vessels with authorisations in the fleet impacting fishing opportunity, whilst changing the focus to larger vessels in the fleet.

Benefits

- If the aggregating of authorisations was allowed this could lead to a concentration of fishing capacity in fewer, larger vessels, increasing overall fishing capacity and undermining sustainability goals. This recommendation prevents this impact.
- Prevents unfairness and the reduction of fleet diversity in the inshore fleet.

- Prevents the value of vessels with a bass authorisation increasing and further barriers to entry for new fishers through the inflation of the cost of vessel replacement.
- Aggregation could complicate the tracking of fishing effort and compliance, especially if authorisations are split or combined across different gear types or vessel sizes.
- Allowing aggregation may fail to be consistent with the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 5: *Maximise the benefits of bass fishing for local coastal communities.***
- Retains the characteristics of the inshore fleet

Risks

- Preventing aggregations of bass authorisations does not assist fishers finding a single licence that matches the specifications of a new or replacement vessel. It is often difficult to find a licence which fits perfectly, and fishers often need to aggregate to be able to get a licence for the vessel.
- Some authorisations may remain unused if they cannot be aggregated, leading to inefficiencies in the fleet and lost fishing opportunity.

Implementation and Mitigation

This recommendation does not create any changes or additions to the current regulation and therefore no implementation is required.

Recommendation 14: New entrants to the fishery would not be allowed to transfer an authorisation when the vessel is sold

Recommendation 1 if implemented would allow additional authorisations to be issued within capacity and sustainability limits. Newly authorised vessels utilising any additional authorisations would not be allowed to transfer an authorisation if the vessel is sold.

Current authorised vessels would continue in the current rule to mitigate the impact of demonetisation and to assist in the ability to manage the stock and control authorisations when they are no longer required. The aim of the measure would be to assist in the ability to manage the stock, but the objective should not be to reduce the financial benefit that currently exists in vessels with bass authorisations.

Benefits

- This measure would assist in the flexibility to manage fishing effort and changes to the stock. Being able to control the number of authorisations enables fisheries managers to more effectively manage the fleet, allowing them to decide what

type of authorisation or management is best to support the goals of the [Bass Fisheries Management Plan \(FMP\)](#).

- Provides flexibility in controlling the number and type of authorisations and not reissuing the authorisation if fishing pressure was too high.
- Enables the issuing of new authorisations to attract new people into the bass fishery, particularly young people, who cannot afford to pay a premium to fish for bass and therefore being consistent with obligations under the [Fisheries Act 2020](#), specifically the **National Benefit Objective *in that fishing activities of UK fishing boats bring social or economic benefits to the United Kingdom or any part of the United Kingdom.***
- Prevents individuals prospecting and obtaining an authorisation based on its potential commodity value.

Risks

- Preventing new authorisations from transferring when a vessel is sold would create a two-tier system and an administrative and resource burden for MMO.
- During the analysis of this opportunity, it was considered that implementing this measure could lead to legal challenges.
- The process of allowing authorisations to be transferred when sold supports movement of fishing opportunity as the fishery changes, allowing those in areas that did not previously have bass to enter the fishery, this measure could restrict that process.

Implementation and Mitigation

- Further Investigation of the administration and resource implication of this recommendation is required.
- Consider and clarify the criteria that this recommendation would apply.
- Align with **recommendation 24 Move authorisations to an automated system**
- Identify additional MMO resource requirements

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**.

Table 7 below shows the dependencies associated with these recommendations and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.
- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.

Table 7: Dependencies

	Recommendation	Type	Dependency
10	Authorisations to remain attached to the vessel hull	External dependency Communication	Clarification and communication of the process to be used when transferring an authorisation to a new vessel (bass guidance)
		External dependency MMO Policy/Guidance	Formalise MMO bass authorisation retention policy when there are delays in replacing a vessel
11	Allow limited increase in Engine power and vessel size.	External dependency Research	Research of fleet characteristics is required to identify the appropriate flexibility in terms or engine power and vessel size increases
		Mandatory Dependency Regulation requirement	To introduce greater flexibility, particularly in cases involving different vessel types or capacity changes, amendments to the legislation will be necessary
12	Retain the current under 8 metre exemption to monohull	External dependency Research to ensure fairness and transparency	To ensure fairness and consistency, further research is needed to determine whether transferring an authorisation from an under 8 metre monohull to an under 8 metre catamaran would result in a disproportionate increase in capacity compared to the limited increases permitted under Recommendation 11
		External dependency Compliance assurances	If the outcome of research above indicates that in the interest of fairness catamarans may be included in the exemption, then amendments to the legislation will be necessary
13	Retain the restriction on aggregations	Internal dependency Implementation options and sensitive species bycatch mitigation	None
14	New entrants to the fishery would not be allowed to transfer an authorisation when the vessel is sold	External dependency Track record fishing opportunity	Implementation of Recommendation 1: The track record requirement for issuing bass authorisations should be removed providing fishing opportunity
		Mandatory dependency Regulation requirement	During the analysis of this opportunity, it was considered that implementing this measure could lead to legal challenges
		External dependency Legal challenge	Identify risk of legal challenge
		External dependency Administrative resource	Implementation of Recommendation 24 moving authorisations to streamlined system

11. Compliance and Enforcement

During the authorisation review process, the subgroup conducted analysis of the current authorisation system, alongside broader opportunities identified through subgroup discussions and stakeholder engagement events. This analysis informed a series of recommendations, which included benefits, risks, mitigation and implementation considerations associated with enforcement and compliance.

Several of these recommendations, such as **Recommendation 1 (removal of the track record requirement)** and **Recommendation 6 (permitting fixed gillnet authorised fishers to switch to hook and line gear)** carry specific enforcement and compliance implications. In subgroup meetings stakeholders raised the potential for increased misreporting of bass landings by gear type because of these changes.

Non-powered vessels (NPV) were also discussed as part of this section, recognising that there is no statutory function for MMO to register NPVs and that the system was open to abuse from both recreational and commercial fishers in terms of transshipping and misreporting.

This section therefore focused on exploring potential recommendations aimed at mitigating the risks of misreporting, transshipping, and the targeting of bass aggregations. The subgroup considered a range of options to address these concerns and to facilitate the implementation of wider recommendations from the review.

1. How can the under 10 metre catch app be improved to support catch reporting?
2. Mitigation of misreporting of bass landings by gear type.
3. Should non-powered vessels under 10 metres remain exempt from the requirement to have a bass authorisation?
4. [Bass Fisheries Management Plan \(FMP\)](#) **Goal 4:** Ensure full compliance with bass regulations.

Background

1. Bass Fishery Gear Use

All commercial fishing vessels are authorised to land unavoidable bass bycatch by demersal trawls and seines, and no written authorisation is required. However, catches of bass are restricted to a 10% limit by weight of all marine organisms per trip up to a total limit of 3.8 tonnes per vessel per year.

Only commercial fishers with a written authorisation are permitted to catch and retain bass as a bycatch using fixed gillnet and with hook and line as the only targeted bass fishery subject to the landing limits below (2025).

- Hook and line 6.8 tonnes per year.
- Fixed gillnet by-catch of 1.8 tonnes per year.

2. Misreporting of Gear Type.

Misreporting refers to the intentional or unintentional misdeclaration of bass landings particularly regarding the gear type used. An example raised includes dual authorised commercial fishers reporting catches as taken by hook and line (subject to higher catch limits) while actually using gillnets or trawls

Accurate gear reporting is essential for:

- Ensuring compliance with catch limits.
- Supporting effective enforcement and inspections.
- Providing reliable data for fisheries management and stock assessments.

3. Regulation on Gear Carriage

It is a requirement within a Fishing Vessel Licence that UK vessels may only carry one authorised fishing gear on a fishing trip when retaining bass on board, this provides the regulation to prevent misreporting by gear type.

“A vessel authorised to fish for bass using more than one of the gear types may not retain on board bass if more than one of the gear types is present on board the vessel during any single fishing trip”.

4. Non-Powered Vessel (NPV)

Under the [Fisheries Act 2020](#), fishing anywhere by a British fishing boat is prohibited unless authorised by a fishing vessel license. However, this requirement does not apply to a vessel whose length is 10 metres or less and which does not have an engine to power the vessel.

As a result, where NPV under 10 metre vessels are acting in a commercial capacity:

- They are exempt from licensing requirements and consequently the requirement under the fishing vessel licence to have a bass authorisation.
- They are not subject to the same commercial regulations, landing limits or reporting obligations.

Historically, NPVs could be issued a unique reference number by the MMO to facilitate recording sale of catches on sales notes. From February 2025, this practice has changed, and all sales relating to NPVs should be recorded under a singular reference number “NPV0001”.

There may be local [Inshore Fisheries and Conservation Authorities \(IFCA\)](#) restrictions, permit requirements or regulations that apply to NPVs.

Analysis

Summary

Misreporting bass landings and the targeting of aggregations was raised as a risk in many of the recommendations and broader opportunities discussed. During the analysis phase of the review several opportunities to reduce the issue were put forward for discussion.

Recreational fishing stakeholders suggested that individuals owning multiple vessels with bass authorisations could misreport landings against vessels never leaving port, and that individuals should only be entitled to one bass authorisation. Commercial representatives argued that there was limited rationale for this approach and that evidence was largely anecdotal. Following analysis, this opportunity was descope summarising that the implementation of [Inshore Vessel Monitoring System \(I-VMS\)](#) alongside catch recording may provide the tools for MMO enforcement.

The group discussed the removal of dual authorisations and having only one type of gear entitlement, raised as a policy consideration in the review scope and by recreational representatives who highlighted that dual authorisations could also encourage misreporting and that enforcement challenges mean the risk of being caught illegally misreporting bass landings is low, discriminating against those legitimate fishers obeying the rules.

Commercial fishing participants pointed out that dual gear authorisations were a vital part of a small boat's income, removing dual authorisations removes opportunity particularly in the winter months when water quality dictates certain fishing methods. The removal of dual authorisations would increase discards particularly from vessels employed in a mixed fishery with gillnets, reducing the flexibility for fishers to diversify. This consideration was also descope due to the impact on fishing opportunity and diversification of fishing practice.

During the discussions around misreporting and transshipping, MMO compliance were tasked to investigate available intelligence on bass misreporting and landings outside of authorisations.

Summarising that the issue of fishers with bass authorisations landing catch on behalf of fishers with no bass authorisation was deemed very low risk. Given the increasing awareness and potential for this behaviour, a push to gather more intelligence in the current bass season would assist the intelligence team in exploring this issue further.

Representatives from the RSPB confirmed their position that REM remains the most effective approach for enhancing evidence collection, compliance, and enforcement within the fishery. They expressed enthusiasm for the authorisations review subgroup to recommend REM trials, particularly in relation to fixed gillnet authorisations stating that such trials could contribute to several evidence gaps previously identified by the Bass Management Group.

Misreporting and targeting of bass aggregations by gillnetters was discussed by the group and led to a series of recommendations put forward as mitigation in this section. Discussions were concluded summarising that misreporting and targeting should be dealt with through the existing regulation, via intelligence reporting and vessel monitoring.

The subgroup analysed issues surrounding NPVs reaching consensus that the lack of regulation posed an increasing problem, indicating that the issue of NPVs had

escalated, particularly in the South West and had moved into other species including pollack.

- NPVs are not required to carry [Inshore Vessel Monitoring System \(I-VMS\)](#) or other Identification systems making enforcement difficult.
- Due to NPV size and mobility, vessels can launch from informal sites making them hard to detect.
- NPV's can target aggregations in inaccessible areas that bass may seek for protection.
- Individuals don't have to own a NPV they could simply declare bass landed as such.

Despite the negative impacts posed by NPVs the group also highlighted that fishing in this sector was a selective and sustainable fishing practice, with significant environmental and economic benefits. It was recognised that there are several legitimate commercial fishing NPVs that genuinely wanted to be recognised and regulated to develop a high-class, low impact fishery.

Discussions concluded with a recommendation that a registration scheme for NPVs should be established, with set catch limits and a requirement to report landings through the Catch App.

Stakeholder engagement

During the stakeholder engagement phase of the bass authorisation review, both recreational and commercial fishers stated that certain proposed recommendations could inadvertently increase the risk of misreporting. Stakeholders emphasized that such measures should not be implemented without appropriate enforcement safeguards. Among the options discussed were the pre declaration of gear type and the use of [Inshore Vessel Monitoring System \(I-VMS\)](#) to enhance compliance.

Views on the impact of NPVs varied by region. In the East, commercial fishers generally did not perceive NPVs as a significant issue, although they supported the introduction of regulation. In contrast, stakeholders in the South West identified NPVs as an increasing concern.

Despite recognising that NPV non-powered fishing vessels are often selective and environmentally sustainable, both commercial and recreational stakeholders agreed that the lack of catch reporting, the potential for transshipping, and the absence of regulation posed serious risks to compliance and stock sustainability. There was broad consensus that additional regulation is necessary to ensure accountability and protect the bass fishery.

1. Mitigation of misreporting of bass landings by gear type

Across the 20 stakeholder engagement events held as part of the bass authorisation review, the issue of misreporting emerged consistently in discussions on a wide range of topics.

During the recreational fishers online meeting, participants questioned the rationale behind introducing changes that could increase existing enforcement challenges. They expressed concern that expanding the fishery without first addressing enforcement shortcomings would be counterproductive. Several participants suggested there was a perceived lack of will or capacity to enforce rules around targeting and misreporting effectively.

Commercial fishers echoed these concerns, stating that any new authorisations should be subject to resolving current enforcement shortcomings, particularly those related to gear-specific targeting and misreporting. In the South West, commercial stakeholders proposed that fishers currently authorised to use fixed gillnets should only be given the option to switch to hook and line gear (**Recommendation 6**), provided that such a change does not increase the risk of misreporting.

2. Should non-powered vessels under 10 metres remain exempt from the requirement to have a bass authorisation?

At 14 stakeholder events, including those attended by commercial fishers, regulators, and participants in the recreational fishers online session, the topic of NPVs remaining exempt from regulation was met with negative responses. There was uneasiness about the risks of transshipping and misreporting. While stakeholders acknowledged the environmental, sustainability, and selectivity benefits of this fishing method, noting its potential to support opportunities for young fishers, they also highlighted concerns around safety, duty of care and undermining of market value.

There was broad agreement that some form of licensing and regulation should be introduced. It was also suggested that implementing an appropriate catch limit could help mitigate the risk of transshipment.

In contrast, at six events held in the East, no firm conclusions were reached due to the limited use of NPVs in those areas. However, participants generally supported the principle that regulation and monitoring should be in place, even if the issue was not currently significant in their region.

Recommendations

Recommendation 15: Catch App be amended to direct fishers to declare gear type prior to departure

Several opportunities discussed during this review aimed to reduce misreporting, this includes not issuing dual authorisations and the removal and reallocation of authorisations from fishers benefiting from multiple authorisations. Both options were descope due to the additional weaknesses identified during analysis. However, to

mitigate misreporting and to support existing gear carriage regulations, this recommendation is for the catch app to be amended to allow and direct fishers to declare gear type prior to departure on a fishing trip.

Benefits

- Simplifies inspections allowing regulatory organisations to verify whether the gear on board and the fish landed declaration matches the declared type.
- Reduces misreporting by preventing fishers from misreporting gear type to exploit different catch limits.
- Supports targeted monitoring by allowing regulators to focus resources based on gear type, risk and intelligence.
- This could be consistent with [Bass Fisheries Management Plan \(FMP\) Goal 4: *Ensure full compliance with bass regulations.*](#) To ensure that all those fishing for bass understand and comply with the regulations.
- Improve accuracy of catch attribution ensuring that landings are correctly linked to the gear used, improving data for fisheries management.

Risks

- Added declarations may be difficult for small scale fishers.
- Risk of false declarations if oversight is weak, especially in remote areas.
- The cost and time implications could be significant. Initial enquires with Catch App and with comparison to similar actions indicate the cost of amending the catch recording app could be in the region of £250k, with over 12 months to implement.

Implementation and Mitigation

- Further research of MMO data to identify the extent and scale of misreporting events.
- Further cost and time investigation.
- Explore other gear declaration opportunities.
- Explore if gear declaration on landing (**Recommendation 17**) would negate this recommendation.
- Consider if accurate gear notification can be implemented that dual authorised fishers may be allowed to bypass gear carriage rules.

Recommendation 16: Review of the current closure period to establish if the protection it provides to the stock is appropriate.

As previously mentioned during track record discussions (**Recommendation 1, removal of track record process**) in subgroup and wider engagement meetings, the targeting of bass aggregations by gill nets have been discussed.

In several meetings in the South West fishers openly acknowledged the practice of targeting, rationalising the practice by indicating that was all there was to catch, and it could not be avoided.

Commercial and recreational fishing stakeholders also referred to the relevance of the current closed season, adding that anecdotally, bass aggregations now differ around the coast region to region, suggesting that research should be undertaken to establish if there should be a regional approach to closures to further mitigate the targeting of bass aggregations.

Benefits

- This would be consistent with obligations under **Goal 7: Ongoing protection of juvenile and spawning bass stock**, and its short-term goal to Gather evidence on the most suitable timing and duration of the closed seasons, including the possibility of regional variations. Many stakeholders expressed a willingness to support scientific research.
- This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) specifically **Goal 6: Sustainable harvesting of bass stock in line with scientific advice**, by ensuring that fishing opportunity is based on scientific advice and a reliable stock assessment.
- Accurate closed seasons established if appropriate at a regional level could assist in protecting pre spawning aggregations and the protection of sensitive species such as sea birds.

Risks

- Enforcement and compliance implications of regional approach to closures due to the lack of harmonisation.
- Measures that are not harmonised across regions could impact on recreational fishers.

Implementation and Mitigation

- The authorisation review subgroup is aware of the short term aims under **Goal 7:** of the [Bass Fisheries Management Plan \(FMP\)](#) and the considerations of the timing and duration of closed seasons discussed through the BMG.

Recommendation 17: Direct that gear type and bass catches weight be declared before landing.

Continuing with recommendations to mitigate misreporting this option would direct that gear type and bass landing weight be declared before fish are landed. This recommendation is applicable only to the under 10 metre fleet using the Catch App and applies to hook and line and fixed gillnet authorised vessels only.

Benefits

- Simplifies inspections allowing regulatory organisations to verify whether the gear on board and the fish landed declaration match.
- Reduces misreporting by preventing fishers from misreporting gear type to exploit different landing limits.
- Supports targeted monitoring by allowing regulatory bodies to focus resources based on gear use.
- This would be consistent with obligations under [Bass Fisheries Management Plan \(FMP\)](#) **Goal 4: *Ensure full compliance with bass regulations***, to ensure that all those fishing for bass understand and comply with the regulations.
- Improve accuracy of gear attribution ensuring that landings are correctly linked to the gear used, improving the data for fisheries management.

Risks

- Added declarations may be difficult for small scale fishers.
- Risk of false declarations if oversight is weak, especially in remote areas.
- Cost and time implications to be established.

Implementation and Mitigation

- Further research of MMO intelligence and data to identify the extent and scale of misreporting events.
- Further cost and time investigation to identify other potential gear declaration options.

Recommendation 18: Remote Electronic Monitoring (REM) of vessels.

- Support recommendations where possible with the appropriate use of electronic monitoring.

- Encourage fishers in the bass fishery for early adoption of REM.
- Prioritise the use of REM for individual vessels identified as high risk.

The subgroup recognised that through the [Bass Fisheries Management Plan \(FMP\)](#) **Goal 3 to incentivise participation in REM early adopter programmes** and **Goal 8.1 promoting commercial fishers uptake of monitoring on vessels**, Defra plans to expand the use of [REM in English waters](#) over the next five years in selected priority fisheries, the factors listed in this recommendation support this approach.

RSPB representation in the authorisation review subgroup raised the risk to sensitive species bycatch in many of the recommendations including **Recommendation 1 (removal of the track record system)** and **Recommendation 5 (Inshore drift netting scientific trial)** whilst providing support for recommendations that encouraged a transition to hook and line gears (**Recommendation 6**).

RSPB representatives highlighted that if the authorisation system presents obstacles to removing sensitive species bycatch, then knowledge should be pooled to identify solutions, this included suggesting collaboration across other relevant FMP species such as pollack. Highlighting that by supporting recommendations with REM this could also assist with seabird and other sensitive species bycatch monitoring, and this aim should be pursued in any relevant recommendations detailed in this document.

Benefits

- **Support recommendations with the use of electronic monitoring.** This would be consistent with obligations under the [Bass Fisheries Management Plan \(FMP\)](#) **Goal 8.1: Improve monitoring to better understand sensitive species bycatch in bass fisheries**. Specifically, the short-term aim in promoting and ensuring commercial fishers uptake of monitoring on vessels including observers or REM.
- **Encourage fishers in the bass fishery for early adoption of REM.** This would be consistent with obligations under **Goal 3: [Bass Fisheries Management Plan \(FMP\)](#) Minimise discarding of bass bycatch where survival rates are low**, specifically in relation to the long term aim to consider how to incentivise participation in REM early adopter programmes to improve data collection on discards.
- **Prioritise the use of REM for vessels identified as high risk.** This would support mitigations in **Section 9, Enforcement and Compliance**.

Risks

- Initial installation and maintenance cost can be expensive particularly for the smaller inshore fleet.
- Smaller vessels, common in the bass fishery, may struggle with space and power requirements for REM equipment.

- Recommendations may not align with Defra [REM in English waters](#) priorities.

Implementation and Mitigation

- The subgroup recognised that through the FMP Defra plans to expand the use of [REM in English waters](#) in selected priority fisheries.
- Collaborate with IFCA's with regards to existing monitoring approaches and technology.
- Incentivise the use of REM in the bass fishery by allowing the carriage of dual gears on dual authorised vessels.
- Incentivise early adoption of REM in the bass fishery through funding.

Recommendation 19: Registration of non-powered vessels.

NPVs of under 10 metres are exempt from licensing requirements and consequently the requirement under the fishing vessel licence to have a bass authorisation.

As a result, where non powered under 10 metre vessels are acting in a commercial capacity:

- They are exempt from licensing requirements and consequently the requirement under the fishing vessel licence to have a bass authorisation.
- They are not subject to the same catch limits or reporting obligations.
- Due to the nature of NPVs they have no capacity to comply with either MCA requirements of vessel safety or port health requirements for food safety.

Historically, NPVs could be issued a unique reference number by the MMO to facilitate recording sale of catches on sales notes. From February 2025, this practice has changed, and all sales relating to NPVs should be recorded under a singular reference number "NPV0001".

In addition to the negative impacts of NPVs the subgroup also highlighted that fishing in this sector was a selective and sustainable fishing practice with environmental and economic benefits.

Benefits

- Registration assists in identifying total fishing effort and landings, improving the accuracy of landing data.
- Registration creates a formal record of all vessels participating in the fishery mitigating the risk of transshipping and misreporting.

- Ensures fairness and accountability across sectors.
- There are numerous legitimate commercial fishing NPVs with a genuine wish to be recognised and regulated to develop a high-class low impact fishery.
- Registration would mean they would be subject to the same requirements and regulations.

Risks

- Data protection risk, particularly if registration data is held in relation to young persons.
- Requiring NPVs to register could bring safeguarding and safety implications.
- NPVs such as a kayak would not have the same level of safety, insurance or vessel registration requirements that would apply to a commercial fishing vessel.

Implementation and Mitigation

- Explore the potential for a registration system that requires fishers from unpowered vessels to register with the MMO.
- Explore the process that could require NPV fishers to submit catch reports using the under 10 metre Catch App.
- Exploration of data protection and safeguarding implications particularly with the registration of young fishers.
- If the risks prohibit NPVs from being under a registration scheme, then they should be categorised as recreational fishers and align with those regulations.
- Future development of [Fish Labelling](#) requirements may assist in mitigating NPV issues.

Recommendation 20: Develop a hook-to-plate accreditation for the bass fishery.

This recommendation supports and enhances **Recommendations 6, Allow the switch from fixed gillnet authorisation to hook and line** and would seek to establish a dedicated accreditation scheme within the bass fishery, specifically for commercial fishers authorised to use hook and line gear.

This initiative originally proposed by recreational representatives in the authorisation review subgroup aims to foster a transparent, traceable, and high-quality fishery that supports both sustainability and market integrity.

- Promoting responsible fishing practices through traceability.

- Enhance the market value of line caught bass by certifying quality.
- Build trust among consumers, regulators, and stakeholders.

Benefits

- Supports sustainability by encouraging selective, low-impact fishing methods.
- Boosts consumer confidence through traceability and verified practices.
- Improves regulatory compliance by linking hook and line authorisations with best practice.
- Facilitates a registration scheme for NPVs, integrating them into a recognised and accountable structure.
- Contributes towards meeting **Goal 8.1** of the [Bass Fisheries Management Plan \(FMP\)](#). Allowing the switch to hook and line gears.
- Supports and enhances **Recommendation 6, Allow the switch from fixed gillnet authorisation to hook and line.**

Risks

- None identified at this stage, however ongoing stakeholder engagement will be essential to ensure broad support and practical implementation.

Implementation & Mitigation

- Utilise existing models and organisations
- Engage stakeholders across the commercial and recreational sectors to co-design a scheme, ensuring it is practical, inclusive, and regionally appropriate.
- Pilot the scheme in a selected areas to test feasibility.

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**.

Table 8 below shows the dependencies associated with this recommendation and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.
- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.

Table 8: Dependencies

	Recommendation	Type	Dependency
15	Catch App be amended to direct fishers to declare gear type prior to departure	External dependency Cost analysis	Cost analysis
		Mandatory dependency Regulatory amendments	Regulatory amendments including fishing vessel licence and catch recording guidance
16	Review of the current closure period to establish if the protection it provides to the stock is appropriate	External dependency	Defra/Bass Management group prioritisation and sequencing
17	Direct that gear type and bass catches weight be declared before landing	Mandatory dependency Regulatory amendments	Regulatory amendments including fishing vessel licence and catch recording guidance
18	Remote Electronic Monitoring of vessels	External dependency	Defra REM programme
19	Registration of NPVs	External dependency	Analysis of safeguarding, safety and data protection implications
20	Develop a hook-to-plate accreditation for the bass fishery.	Discretionary Dependency	Identify route to support bass fishery accreditation through stakeholders

12. Discard and Electronic Catch Recording (Catch App)

This section of the review focused on discards and catch recording with the following considerations:

- 1 How to encourage better discard reporting through the authorisation system?
- 2 How can the under 10 metre catch app be improved to support catch reporting?

Background

The management of fishing opportunity is often reliant on data, and it should be ensured that catches and discards are correctly recorded. This provides confidence that there is data to meet sustainability goals and management decisions.

Discard recording

The [Landing obligation](#) requires all commercial fishers to land all catches of species subject to Total Allowable Catch (TAC) limits or Quota, this does not however apply to bass. Therefore, any bass caught using an unauthorised gear, or any catches exceeding the permitted limit when using an authorised gear, or are below MCRS, must be discarded.

Additionally, during February and March, all bass fishing is prohibited, and bass caught during this period must be returned to the sea.

If more than 50kg of bass is discarded during a trip, commercial fishers must record the estimated weight of those discards in their fishing logbook or catch recording app.

Catch recording.

The [Fishing vessel licence](#) for under 10 metre vessels requires the completion of an electronic catch record ([Catch App](#)) which must be accurately completed by the master of the vessel or representatives, indicating specifically all quantities of each species caught.

The electronic catch record should contain.

- Identification number and the name of the fishing vessel.
- The departure port and date.
- Landing port and date.
- Gear type used to catch the fish species landed, including the mesh size, species code and relevant [ICES statistical sub-rectangles](#).
- Estimated quantities of each species in kilograms live weight; to be retained on board or landed.
- Estimated quantities of discards for any species not subject to the landing obligation.

The licence condition stipulates a 10% permitted margin of tolerance for all species estimated.

Analysis

Summary

Goal 3: [Bass Fisheries Management Plan \(FMP\)](#) Minimising Discarding of Bass Bycatch with Low Survival Rates outlines specific steps to improve data collection on discards. During analysis of this section, the subgroup explored both the barriers to discard reporting and the short-term objectives of the FMP, including:

- Enhancing data collection on discards.
- Exploring options to allow the landing of bass discards.
- Offering incentives in exchange for discard data.

Goal 2: [Bass Fisheries Management Plan \(FMP\)](#) Ensuring Equitable Access While Prioritising Sustainability includes a review of the domestic bass authorisation system, aiming to align it with other FMP goals, including the reduction of discards under **Goal 3**. The subgroup also considered how recommendations in this report could support and align with the reduction of discards as follows:

- **Incentivise reporting: Recommendation 7.** Trial allowing all non-authorised gillnetters to land up to two bass per day if discard data is submitted.
- **Establish a demersal trawls and seines working group: Recommendation 9.** The authorisation review recognised the complexity of issues related to regulations, bycatch, discards, and catch composition recommending that it should be subject to a specific review.
- **Regional bycatch avoidance: Recommendation 16.** By reviewing the timing and duration of closed seasons at a regional level to reduce targeting of bass aggregations and discards.
- **Encourage REM participation: Recommendation 18.** Promote early adopter programmes for REM to improve data on discards and sensitive species bycatch.

Barriers to Discard Reporting

The subgroup identified key challenges and barriers to discard reporting, with consensus among subgroup stakeholders that commercial fishers are often reluctant to report discards. Several contributing factors were identified:

- **Lack of trust and confidence.** Fishers fear that reporting high discard rates in the bass fishery could lead to stricter regulations and increased inspections, reduced catch limits, or reputational harm.

- **Limited capacity on smaller vessels.** Many commercial fishers lack the time, space, or equipment to sort and record discards effectively.
- **Practical and logistical constraints.** Accurate discard recording is particularly difficult on smaller vessels or in mixed-species fisheries.
- **Low motivation.** There are few obvious incentives for fishers to report discards voluntarily.

The group concluded with several practical options to enhance and improve discard reporting.

- **Enhance the Catch App.** Introduce discard categories to increase discard data quality.
- **Improve Stakeholder Confidence.** Build trust by clearly communicating the requirements and benefits of discard reporting to stakeholders.
- **Incentivise reporting.** For example, through **Recommendation 7**, trial allowing all gillnetters to land up to two bass per day if discard data is submitted.
- **Peer-led trials.** Engage respected figures in the commercial fishing sector to assist in discard reporting and to promote the value of discard data.
- **Regional bycatch avoidance.** Supports **Recommendation 16** by reviewing the timing and duration of closed seasons at a regional level to reduce targeting of bass aggregations.
- **Encourage REM participation.** Promote early adopter programmes for REM to improve data on discards and sensitive species bycatch (**Recommendation 18**).

Stakeholder engagement

During the stakeholder engagement phase of the bass authorisation review, many commercial fishing participants reinforced the subgroups analysis on the barriers to discard reporting, citing trust and fear of repercussions as the primary reluctance.

Commercial fishers noted that recording discards can be challenging due to the already high workload on board vessels. In some cases, bringing fish on board solely to record their weight before discarding may reduce their chances of survival.

Many expressed strong interest in participating in trials to improve communication and discard data.

1. How to encourage better discard reporting through the authorisation system.

Out of 20 stakeholder engagement events, 16 responded positively to this question. Most participants identified trust and confidence as the main barriers to accurate reporting.

In the South and South East, commercial fishers showed interest in supporting trials to enhance data collection. They proposed several improvements, including:

- Adding more discard categories in the Catch App.
- Allowing bass discards to be recorded by number of fish rather than weight, to assist survivability and reduce the reporting burden.
- Improving communication around the benefits of accurate discard data.

In contrast, commercial fishers in the East expressed concerns. They cited:

- Fear of regulatory enforcement.
- Complexity of rules across multiple fisheries.
- Perceived negative reactions from the recreational fishing sector and non-governmental conservation organisations if discard levels appear high.

At an online event for recreational fishers, participants highlighted the need for better public understanding of discarding practices. They noted that members of the public often witness discards and mistakenly interpret them as pollution or wrongdoing, underscoring the importance of clear communication and accessible reporting mechanisms.

2. How can the under 10 metre catch app be improved to support catch reporting?

Stakeholders at all 20 engagement events agreed that, aside from occasional connectivity issues, the Catch App is simple and user-friendly. However, they suggested several improvements to enhance its functionality:

- **Gear type attribution.** Enable the app to record the gear type used before landing. Also Identified during compliance and enforcement analysis
recommendation 17.
- **Reduce data duplication.** Commercial fishers expressed frustration with having to enter the same data multiple times across the Catch App, IFCA returns, and sales notes. Streamlining these processes would reduce administrative burden.
- **Catch history.** Add a feature that allows fishers to view their previous landings, with a running tally of quota or landing limits by species. This would help fishers track their annual catch more effectively.
- **Integration with IVMS.** Connect the Catch App with [Inshore Vessel Monitoring System \(I-VMS\)](#) to automatically include location data, improving accuracy and reducing manual input.

- **Access to regulations:** Include a link to a rules and regulations page within the Catch App. Fishers noted that it is often difficult and frustrating to access up to date information on species specific and area specific regulations whilst at sea.

Recommendations

Following analysis of discard reporting, catch recording and broader opportunities in the authorisation review subgroup and stakeholder engagement events several recommendations have been identified.

Recommendation 21: Improved communication and provide incentives for discard recording.

The subgroup recognised the reluctance of fishers to record discards highlighting a lack of trust, confidence, and fear that high discard rates could lead to stricter regulations or reputational damage. Improved communication on discard reporting is therefore recommended.

Benefits

- This would be consistent with obligations under **Goal 4:** of the [Bass Fisheries Management Plan \(FMP\)](#), ***Ensure full compliance with bass regulations***, to ensure that all those fishing for bass understand and comply with the regulations particularly discards.
- Clear communication of the benefits could encourage commercial fishers to report discards more reliably improving data to support stock assessment and fishing opportunity.
- Accurate discard data supports management decisions helping to identify trends, avoid overfishing and maintain sustainability of bass populations.
- Fishers are more likely to support discard reporting if they understand the benefits, purpose and see their opinions considered.
- Clear guidance on what, how, and why to report discards reduces confusion and non-compliance.

Risks

Improved communication around bass discard recording has many benefits, but it also comes with potential challenges including.

- The context of any communication provided could be misinterpreted leading to potential negative perceptions of the bass fishery.
- Poorly handled messaging could erode trust between stakeholders and regulators.

- Fishers expressed fear that transparency could lead to restrictions.
- Development of a communication plan would require additional resource.

Implementation and Mitigation

- Design messaging applicable to different sectors to explain the benefits of discard reporting, using examples of how discard data has improved management in other fisheries and for sensitive species bycatch through the [Clean Catch project](#).
- Involve stakeholders in the development of communication materials to ensure relevance and build trust. Provide clear feedback mechanisms to show how input data including fishing effort and vessel activity (iVMS), catch records and gear use and output data, the result of fishing activity (landing data and sales notes) is used in decision-making
- Engagement using stakeholders as intermediaries including producer and fisheries organisations, recreational fishing representatives and regulators to deliver messages.
- A trial to evaluate communication and build confidence before wider rollout.
- A trial to allow discards to be recorded by number of fish rather than weight, to assist survivability and reduce the reporting burden.
- Incentivise reporting through the development of regional trials to drive the benefits of discard data including **recommendation 7**, a trial allowing all non-authorized gillnetters to land up to two bass per day to incentivise discard reporting.

Recommendation 22: Consider amendments to the Catch App

Throughout the authorisation review numerous opportunities have been discussed that relate to improvements to the catch app.

- **Gear Type Attribution.** Enable the Catch App to record the gear type used before landing. Identified during compliance and enforcement analysis under **Recommendation 17** and would assist in the mitigation of misreporting bass landings by gear type.
- **Reduce Data Duplication.** Commercial fishers expressed frustration with having to enter the same data multiple times across the Catch App, IFCA returns, and Sales notes. Streamlining these processes would reduce the administrative burden for commercial fishing stakeholders.

- **Catch History and Quota Tracking.** Add a feature that allows fishers to view their previous landings, with a running tally of quota or catch limits by species. This would help fishers particularly those involved in a mixed fishery to track their annual catch more effectively.
- **Access to Regulations.** Include a link to a rules and regulations page within the Catch App. Fishers noted that it is often difficult and frustrating to access up to date information on species specific and area specific regulations whilst at sea.
- **Categorisation of discards.** Introduce a function within the Catch App and other reporting processes to categorise the type of discards. This would enhance the quality of data and support the justification of specific management measures such as **Recommendation 5, an Inshore Drift Netting Scientific Trial.** Suggested discard categories could include:

Undersized fish. Individuals below the Minimum Conservation Reference Size

Diseased or damaged fish. Visibly unfit for sale due to health or condition

Catch over allocated limits. Fish caught in excess of catch limits

Predated fish. For example, fish damaged by seals

Prohibited species. Such as bass caught using unauthorised gear types

Live v dead discards. How do they add to mortality figures

Benefits

- Improve accuracy of catch attribution ensuring that landings are correctly linked to the gear used, improving the data for fisheries management.
- This would be consistent with obligations under **Goal 3** of the [Bass Fisheries Management Plan \(FMP\)](#), **Minimising Discarding of Bass Bycatch**, with specific steps to improve data collection on discards.

Risks

- Resource and cost implications of Catch App amendments or additions.

Implementation and Mitigation

- Collaboration with Catch App to identify cost and resource implications.

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**.

Table 9 below shows the dependencies associated with this recommendation and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.
- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.

Table 9: Dependencies

	Recommendation	Type	Dependency
21	Improved communication and provide incentives for discard recording	External dependency Targeted communication	Communication strategy. Stakeholder input and engagement
		Internal dependency Incentivise reporting	Development of regional trials to drive the benefits of discard data including recommendation 7 , a trial allowing all non-authorised gillnetters to land up to two bass per day to incentivise discard reporting.
22	Consider amendments to the Catch App to assist in discard reporting	External dependency Catch App	Collaboration with Catch App to identify cost and resource implications.

13. MMO administration - Authorisations.

As part of the authorisations review MMO held internal discussions on resource and the administrative process for the management of bass authorisations. Focusing on:

1. Track record representations.
2. Current administrative process.
3. Resource and database requirements subject to the implementation of measures from the authorisation review.

Background

Track record

Measures to control effort in the bass fishery included a track record process of issuing authorisations. This process ensured that commercial fishing vessels that were historically active in the bass fishery could continue to land bass by certain gear type, providing they could demonstrate a track record of landing bass during the reference period of 1 July 2015 to 30 September 2016.

Representations

It is understood that the Track Record representations process was due to end in 2018, however the process remained open to allow a complaints process to ensure commercial fishers had the opportunity to provide evidence of track record after this point. It should be noted that in the past 24 months no representations with evidence of track record have been received by MMO.

Data Management

Current authorisations data management exists as a data spreadsheet with updates provided by a letter. Bass authorisations are issued based on data contained within this spreadsheet when changes to bass related legislation or regulation occur, for example bass landing limit changes in the fishing vessel licence.

Analysis

Summary

Track record representations

Following analysis and discussions on other recommendations from this review it was considered that it was no longer appropriate for track record applications to be accepted.

- A significant amount of time has passed since the implementation of the track record process.
- The time and resource required to enable MMO to evaluate new representations is excessive and no new evidence has been submitted in the past 24 months.

- Given the potential for new authorisations to be considered under **recommendation 1 (The track record system for issuing bass authorisations should be amended by removing the track record requirement)** track record representations or complaints will no longer be necessary.

Data Management

Internal discussions identified options to ensure the future management of bass authorisations is efficient, particularly important if recommendations under this review are implemented.

Recommendations

Recommendation 23: Close the Track Record applications process.

Given the time passed and the resource required to process track record applications the recommendation is to close the ability for fishers to obtain bass authorisations through the track record process.

Benefits

- Saves time and resources that would otherwise be spent verifying and processing track record applications.
- Allows fisheries managers to focus resource on maintaining the bass fishing fleet through **Recommendation 1**.

Risks

- Requires legislative change to amend regulation requiring track record declarations for a bass authorisation.
- Potential legal and compliance implications of removing track record declarations process.

Implementation and Mitigation

- Further compliance and legal discussions required.

Recommendation 24: Move authorisations administration to an automated system.

- Move bass authorisations from a manual data base to an established automated data base, Sea Fisheries Management (SFM).

Benefits

- **Improved Data Integrity and Accuracy.** Reduces manual entry errors and the risk of data corruption.
- **Resource.** Reduced administrative resource as many functions would become automated and integrated with other data.
- **Integration.** With other systems.
- **Analysis.** Supports data queries and analysis with potential real time reporting.

Risks

- **Cost implications.** Where changes to SFM may be required.
- **Resource implications.** Data transfer.

Implementation and Mitigation

- Further research required to identify cost implications and feasibility.

Dependencies

The implementation of recommendations identified during the bass authorisation system review may be dependent on other recommendations, FMP goals or Legislative requirements. A full list of recommendations from this review can be found at **Annex 3**

Table 10 below shows the dependencies associated with this recommendation and are categorised as follows:

- **Internal Dependencies:** Between recommendations of the authorisation review.
- **External Dependencies:** Involving tasks falling outside of the authorisation review.
- **Mandatory Dependencies:** Tasks involving regulation.
- **Discretionary Dependencies:** Tasks based on preferences of best practice.

Table 10: Dependencies

	Recommendation	Type	Dependency
23	Close the Track Record applications process	Internal dependency Recommendation 1	Recommendation 1. The track record system for issuing bass authorisations should be amended by removing the track record requirement
		Mandatory dependency Legislation	Legislative change required to amend the requirement for track record to obtain a bass authorisation

		Mandatory dependency Legal and Compliance	Compliance and legal discussions required
24	Move authorisations administration to an automated system.	External dependency MMO process	Identify cost and resource implications

Annex 1. Policy guidance and outline scope of the review

Bass Authorisation review - Defra policy guidance and scope.

- The review should be delivered within 2 years of the FMP being published (The commitment is to get the review underway within 2 years, not necessarily complete the review. However, ideally, we would have it delivered within this time frame.)
 - Depending on the scope we will need to agree between Defra and MMO what is a realistic time frame for delivery
- Scope – The review is for registered vessels in England within the designated EEZ
 - The review should be for all registered vessels, not just those with existing authorisations. – Is an authorisation the right method to grant bass fishing rights? Trawls and seins currently aren't included – should they be?
- Secretariat –
 - MMO to chair the group, and select the relevant interests represented on the group
 - MMO to appoint secretariat for the group
 - MMO responsible for the production and oversight of all products required from the group. Defra would expect a written report from the group (setting out current situation, legal history, how quota allocations are devised with the EU, identify current issues, the incentives for doing the review and a timeline for delivery. Report will also have to be transparent – who discussed what. Ideally non-technical but can have annexes with detailed SWOT analysis if needed). Report will be brought to the BMG and a decision will be made by MMO/Defra/ministers following further discussion and recommendations of BMG.
 - MMO to update re progress of the review and provide project updates at IDG meetings.
- Evidence – This group will be supported by the Evidence task and finish group where required
 - Do we have the right evidence to support this, or is more needed? (Evidence base likely to be based on landings and existing advice?) – will need Cefas to feed in to some extent re capacity.
- Assess the suitability of the domestic Bass Authorisation System to determine if

the current system is the most appropriate in line with the FMP short term objectives: (Incentivating the move to hook and line where possible)

How this can be achieved: short term

The bass management group (or groups) should review the current domestic authorisation system, which is designed to help manage fishing pressure on the bass stock. An alternative system should seek to:

- maintain access to the fishery (within sustainable limits)
- align with other bass FMP goals (for example, minimising damage to the wider environment, mitigating and adapting to the impact of climate change, minimising discards, maximising benefits to local coastal communities and ensuring sustainable harvesting of the stock)
 - Goal 2 “Equitable access to the bass fishery, while prioritising stock sustainability”. I.e. maintaining access to the fishery within sustainable limits
 - Goal 8.1 “Minimise and, where possible, eliminate bycatch of sensitive species in bass fisheries”.
- Assess the suitability of the Bass Authorisation System to determine if the current system is the most appropriate in line with the FMP medium term objectives
 - Goal 3 “Minimise discarding of bass bycatch where survival rates are low”.
 - Goal 5 “Maximise the benefits of bass fishing for local coastal communities”.
- SWOT analysis of the current system to inform areas for; improvement, amendment, revocation
 - Assess suitability of current system for UK vessels
 - Recommend options for future system for UK vessels
 - Trawls and seines – no entitlement needed yet have an allocated per trip bycatch of 5% is this suitable – Is it the right approach that trawls and seines not be included?
- Technical considerations
 - Should the bass fishery remain a closed commercial fishery?
 - How do we balance accessibility to the fishery with sustainability?
 - Is the current authorisation system still appropriate?
 - Should authorisation still be based on a track record, or moved to another system?
 - How do we best encourage stock recovery within this system?
 - How do we deal with latent capacity?

- Consider allowing fishers with relevant authorisations the option to switch from using fixed nets to hook and line gears associated with a lower risk of sensitive species bycatch.
- Consideration of one type of entitlement - either, trawl and seine or fixed gill nets or rod and line, not both – requirement for vessels to state which one they are using when going out to fish, and only having that on board
- How to encourage better discard reporting through the authorisation system – better comms issued with permit? – Eg licence condition or better comms? Better guidance? MMO website?
- How can the u10 catch app be improved to support catch reporting – i.e. for non-authorised vessels as currently only licenced vessels can use the app.
- Bass transfers:
- Do we need to prevent increases on engine power and tonnage? Therefore, could we scrap the no increase on tonnage rule and just go by engine power.
- Could we allow bass authorisation to be held on licence entitlements and transfer that way to a new vessel?
- Could we allow aggregation of licence entitlements as it would reduce the number of vessels - While maintaining the ban on disaggregation's.
- Could we allow the U8m exemption where an intended replacement vessel must be a monohull to all U8m vessels including catamarans.
- (although in that case I would not allow a limitless engine power increase)
- Should unpowered vessels under 10 metre remain exempt from the requirement to have a bass authorisation. The Fisheries Act 2020 only exempts them from the licensing requirement.
- Consider NPV issues
- Should there be a review of rec vessels that can sell their catch? – potential look at RBS? Regs of buyers and sellers. Currently no prohibition on marketing catch from recreational fisheries and retained in English law on EU Exit. – could this be covered in the authorisation review?
- Consider overall effort – are localised and regional approaches more appropriate?

Annex 2. Stakeholder Engagement

No	Region	Date	Location	Venue	Stakeholders
1	East	11/02/2025	Wells	The maltings, Sack house Wells-Next-the-Sea	13
2		11/02/2025	Southwold	The swan hotel Market Place, Southwold IP18 6EG	14
3		11/02/2025	Harwich	Harwich and Dovercourt sailing club, Harwich CO12 3HF	15
4		12/02/2025	West Mersea	Yacht club West Mersea Colchester Essex CO5 8PB	16
5		17/03/2025	Whitstable	The Horsebridge Whitstable, Whitstable, CT5 1AF	11
6	South /South East	18/03/2025	Rye	The River Room Rye Harbour Discovery Centre. TN31 7FW	14
7		18/03/2025	Eastbourne	Fisherman's CIC Sovereign Harbour. BN23 5UY	6
8		18/03/2025	Shoreham	The Shoreham Centre. Shoreham, BN43 5WU.	11
9		19/03/2023	Portsmouth	Greene King Inns Farmhouse, Portsmouth. PO3 5HH.	4
10		01/05/2025	Poole	MMO Office Poole, The Quay, Poole, BH15 1HP	9
11	South West	28/04/2025	Brixham	Brixham Trawler Agents, New Fish Quay, Brixham TQ5 8AW	6
12		29/04/2025	Plymouth	Crown & Anchor 10 The Barbican, Plymouth PL1 2LS	16
13		30/04/2025	Mevagissey	Mevagissey Activity Centre, Mevagissey, Saint Austell PL26 6SA	23

14		30/04/2025	Newlyn	CFPO Office, 46 Fore St, Newlyn, Penzance TR18 5JR	14
15		01/05/2025	Lyme Regis	Fishing College, The Cobb, Lyme Regis DT7 3JJ	16
16	Northwest	08/04/2025	Barrow-in-Furness	Brewer's Fayre, North Road, Barrow-in-Furness, LA14 2PW	6
17		09/04/2025	Lytham St Annes	The Railway Hotel Station Road, Lytham St Annes, FY8 5DH	9
18		09/04/2025	Liverpool	Liverpool City Council Liverpool, L3 1BP	7
19	Northeast	19/05/2025	Bridlington	Bridlington Harbour Office	7
20	Online event	04/06/2025	Online recreational event	Online	53

Annex 3. List of Recommendations

- **Goal 1:** Inclusive stakeholder engagement structures to inform management of the bass fishery
- **Goal 2:** Equitable access to the bass fishery, while prioritising stock sustainability
- **Goal 3:** Minimise discarding of bass bycatch where survival rates are low
- **Goal 4:** Ensure full compliance with bass regulations
- **Goal 5:** Maximise the benefits of bass fishing for local coastal communities
- **Goal 6:** Sustainable harvesting of bass stock in line with scientific advice
- **Goal 7:** Ongoing protection of juvenile and spawning bass stock
- **Goal 8:** Minimise the impact of bass fishing on the wider marine ecosystem
- **Goal 8.1:** Minimise and, where possible, eliminate bycatch of sensitive species in bass fisheries
- **Goal 8.2:** Reduce impacts of gear on seabed integrity
- **Goal 8.3:** Reduce contribution of bass fishing to marine litter
- **Goal 9:** Mitigate against and adapt to the impact of climate change on bass fishing

Section/ Category	Recommendation		FMP goals
5 - Track records	1	The track record system for issuing bass authorisations should be amended providing fishing opportunity. An alternative system would seek to maintain access to those currently authorised and identify fishing opportunities for commercial fishers wishing to enter the bass fishery subject to stock, capacity, and sustainability limits. The fishery should no longer remain a closed commercial fishery but allow access to commercial fishers wishing to enter the bass fishery. Bass authorisations should be set as a cap using historic track record data to ensure fishing pressure does not exceed desired levels	Goal 5 Goal 3 Goal 6 Goal 8.1
	2	Analysis of data to identify fishing opportunity. The track record to remove the closed element of the bass authorisation (Recommendation 1) system and allow maintenance of the total bass fleet would increase fishing pressure on the stock. A further recommendation for analysis of data to identify fishing opportunity ensures that the benefit to the stock continues. Analysis of data is required prior to a final decision on fishing opportunity which would include ICES stock assessment, regional stock information and guidance from the Bass Management Group.	Goal 5 Goal 3 Goal 6 Goal 8.1
	3	Create a pool of authorisations for use in a young persons/new fishers scheme. Recommendation 1 to remove the track record requirement provides the potential for additional fishing opportunity and was discussed in the authorisations review subgroup and wider engagement meetings. This recommendation provides the ability to manage and prevent continued decline in the bass fishing fleet whilst creating additional benefits to coastal communities particularly young persons through organised schemes.	Goal 5 Goal 3 Goal 6 Goal 8.1
	4	Create a pool of authorisations for use in alternative gear trials During events around the coast many stakeholders expressed the need for trials to look at alternative gears for the bass fishery, stating that the bass measures did not necessarily reflect the regional picture in terms of historical fishing methods and bass abundance. Trials would be beneficial at a regional level dealing with issues such as seal predation, enabling some flexibility in fishing practice and keeping up with environmental changes.	Goal 5 Goal 3 Goal 6 Goal 8.1

Section/ Category	Recommendation		FMP goals
6 - Drift netting	5	Implementation of a Limited regional inshore Drift Netting scientific Trial A carefully coordinated and structured regional inshore drift netting scientific trial is recommended. The trial should include active collaboration and engagement with stakeholders across the regulatory, recreational, commercial, and non-government organisations. Oversight should be ensured with appropriate monitoring which could include REM or onboard observers.	Goal 1 Goal 5 Goal 3 Goal 6 Goal 8.1 Goal 8.2
	6	Allow the switch from fixed gillnet authorisation to hook and line This recommendation would allow fishers currently fixed gillnet authorised the opportunity to transition to a hook and line authorisation. This opportunity originates from the scope of the authorisation review and the short-term objective of Goal 8.1 in the Bass Fisheries Management Plan (FMP). This goal seeks to reduce the bycatch of sensitive species by enabling fishers with relevant authorisations to adopt a gear type that pose a lower risk to sensitive species.	Goal 8.1 Goal 5 Goal 3
7 - Gear	7	Trial bycatch allowance for all non-authorised fixed gillnet fishers. The concept of allowing all non-authorised fixed gill net fishers to land bass as bycatch within a defined limit was proposed for analysis through identification of broader opportunities by subgroup members from the commercial fishing sector and during stakeholder engagement events by commercial fishers. This approach could help reduce discards, provide limited economic support, contribute valuable scientific data on regional stock movements. It is recommended that a two-fish daily bycatch allowance for non-authorised fixed gill net fishers is considered, with the aim of encouraging discard reporting and data collection.	Goal 1 Goal 5 Goal 3 Goal 6
	8	Demersal trawls and seines should remain not included in the requirement to have a bass authorisation This recommendation stems from scope of the authorisation review to consider if it is the correct approach for trawls and seines not to be included in the requirement to have an authorisation. Through discussions the group established that it was the correct approach.	Goal 3
	9	Establish a demersal trawls and seines working group Subgroup members and commercial fishing stakeholders highlighted the complexity of regulations, discards, and catch composition. Concerns raised regarding bycatch, discards and the reputational risks to both the fishing industry and regulators associated with discarding. The subgroup agreed that these matters extended beyond the scope and expertise of the bass authorisation review subgroup and a dedicated subgroup should be established to specifically review demersal trawls and seines in the bass fishery	Goal 3

Section/ Category	Recommendation		FMP goals
8 - Transfers	10	Authorisations to remain attached to the vessel hull Analysis of whether the authorisation should be attached to a fishing vessel licence, an individual or the vessel concluded with the recommendation that the authorisation should remain attached to the vessel hull. This primarily supports management of the stock by continuing to restrict excessive increases in capacity and therefore effort.	Goal 1
	11	Allow limited increase in engine power and vessel size Provide flexibility in the transfer process to all bass authorised vessels. Allow limited engine power and vessel size increases for vessels authorised to land bass by hook and line and fixed gillnet as bycatch.	
	12	Retain the current U8m exemption to monohull Retain the current U8m exemption where replacement vessel must be monohull. This is due to difference in capacity of catamarans where it was considered that their advantages in stability and useability would give an unfair advantage in the under 8m fleet.	
	13	Retain the restriction on aggregations Aggregation refers to the process of combining multiple fishing licences or entitlements to meet the requirements of a new or replacement vessel and is not currently a mechanism for transferring bass authorisations. This means fishers cannot freely combine multiple authorisations to create a new one for a different vessel.	
	14	New entrants to the fishery would not be allowed to transfer an authorisation when the vessel is sold Recommendation 1 if implemented would allow additional authorisations to be issued within capacity and sustainability limits. Newly authorised vessels utilising any additional authorisations would not be allowed to transfer an authorisation if the vessel is sold. Current authorised vessels would continue in the current rule to mitigate the impact of demonetisation and to assist in the ability to manage the stock and control authorisations when they are no longer required. The aim of the measure would be to assist in the ability to manage the stock, but the objective should not be to reduce the financial benefit that currently exists in vessels with bass authorisations.	

Section/ Category	Recommendation		FMP goals
9 - Compliance and Enforcement	15	Recommendation that the Catch App be amended to direct fishers to declare gear type prior to departure. Several opportunities discussed aimed to tackle misreporting, this includes not issuing dual authorisations and the reallocation of authorisations from fishers benefiting from multiple authorisations. Both descoped however, to mitigate misreporting and to support regulations, the catch app could be amended to allow and direct fishers to declare gear type prior to departure on a fishing trip.	Goal 4
	16	Review of the current closure period to establish if the protection it provides to the stock is appropriate. Commercial and recreational fishing stakeholders also referred to the relevance of the current closed season, adding that anecdotally, bass aggregations now differ around the coast region to region, suggesting that research should be undertaken to establish if there could be a regional approach to closures to further mitigate the targeting of a bass aggregation.	Goal 7
	17	Direct that gear type and bass catches weight be declared before landing. Continuing with recommendations to mitigate misreporting this option would direct that gear type and bass landing weight be declared before landing, with no grace period before fish are taken off the vessel.	Goal 4
	18	Remote Electronic Monitoring of vessels. The subgroup recognised that through the Bass Fisheries Management Plan (FMP) Goal 3 to incentivise participation in REM early adopter programmes and Goal 8.1 promoting commercial fishers uptake of monitoring on vessels, Defra plans to expand the use of REM in English waters over the next five years in selected priority fisheries, the factors listed in this recommendation support this approach.	Goal 8.1
	19	Registration of non-powered vessels Non-powered vessels of under 10 metres are exempt from licensing requirements. They are not subject to commercial catch limits or reporting obligations and can operate outside the regulations applied to licensed fishing vessels or recreational catch limits. Historically, NPVs could be issued port letters and numbers by the MMO to land bass at market, but this practice has now been discontinued with fish now being landed are recorded through a generic code.	Goal 2 Goal 4
	20	Develop a hook-to-plate accreditation for the bass fishery. Recommendation to develop an accreditation scheme in the bass fishery specifically in relation to commercial fishers authorised with hook and line gear and recommended by the recreational representatives of the authorisation review subgroup to assist in creating a transparent and traceable high-class bass fishery.	

Section/ Category	Recommendation		FMP goals
10 Discards and catch recording	21	Improved communication and provide incentives for discard recording. The subgroup recognised the reluctance of fishers to record discards highlighting a lack of trust, confidence, and fear that high discard rates could lead to stricter regulations or reputational damage. Improved communication on discard reporting is therefore recommended.	
	22	Consider amendments to the Catch App Throughout the authorisation review numerous opportunities have been discussed that relate to improvements to the catch app including. <ul style="list-style-type: none"> • Gear Type Attribution. • Reduce Data Duplication. • Catch History and Quota Tracking. • Integration with IVMS. • Access to Regulations. • Categorisation of discards. 	
11 Administration	23	Close the Track Record applications process. Given the time passed and the resource required to process track record applications the recommendation is to close the ability for fishers to obtain bass authorisations through the track Record process.	
	24	Move authorisations administration to an automated system. Move bass authorisations from a manual data base to an established automated data base Sea fisheries management (SFM).	

Annex 4. List of descoped opportunities

No	Descoped opportunity
1	<p>Recovery of authorisations from other authorities.</p> <p>Discussed as an opportunity identified to increase the number of available authorisations within capacity limits. Through discussions it was identified that the number of authorisations likely to be affected is so small it is not perceived to be an issue.</p>
2	<p>Recovery of unused authorisations. Categorised as authorised vessels not landing bass during a particular period.</p> <p>Categorised as authorised vessels not landing bass during a particular period. This was descoped due to the weaknesses, this measure would create an issue where fishers feel forced to utilise their authorisation in order to retain it. Many fishers employ a mixed fishery approach and diversifying. Removal of this choice would impact on fishing opportunity and the ability to diversify.</p>
3	<p>Remove and reallocate authorisations from fishers benefiting from multiple authorisations.</p> <p>This opportunity was clarified as individuals owning multiple vessels with bass authorisations misreporting landings on vessels never leaving port and was descoped due to the weaknesses. Commercial representatives argued that there was limited rationale for this approach and that evidence of misreporting in these circumstances was largely anecdotal. Concerns around misreporting should be dealt with via current regulation, intelligence reporting and IVMS.</p>
4	<p>Open authorisations to all smaller vessels.</p> <p>De scoped as needs to be considered in conjunction with other options including gear type, stock status and bycatch.</p>
5	<p>Move away from authorisation towards quota system.</p> <p>Descoped due to weaknesses, a quota system would increase the number of fishers catching bass therefore diluting the individual available landing limits and restricting opportunity. The current approach to landing limits provides flexibility to fishers.</p>
6	<p>Grant authorisations for a fixed term.</p> <p>De scoped as the weaknesses outweigh the strengths. This measure would not allow for financial certainty or the appropriate amount of business planning. The impact on fishers long term business planning would be significant. Effort control is done by managing the number of authorised vessels in the fleet, catch limits. and closures. It was not thought necessary to initiate further uncertainty in the fishing industry.</p>
7	<p>Consideration of one type of gear entitlement either, trawl and seine or fixed gill nets or rod and line, not both.</p> <p>De scoped due to impact on fishing opportunity and diversification of fishing practice. Concerns around misreporting and targeting by gillnetters is recognised and may be mitigated with enforcement recommendations.</p>

8	<p>Bass authorisations for netters should contain a 25% of catch per trip restriction. The percentage restriction should be by first landed value, rather than by weight, to prevent fishers loading up on low value fish, to land bass.</p> <p>De scoped due to weaknesses. We are not recommending a catch composition for the FGN fishery however the concerns around the targeting of pre spawning aggregations are recognised.</p>
9	<p>Bycatch allowance for different gear types.</p> <p>Descoped as it was considered that there was difficulty in identifying stock impacts due to uncertainty on gear quantity. The approach to develop more selective gear types is supported in other recommendations. The risk of misreporting from those taking the opportunity to catch bass and claim that they are landed by a different gear type was felt to be too high</p>
10	<p>Allow all smaller vessels to engage in a limited rod and line fishery.</p> <p>De scoped due to weaknesses. It is not appropriate to encourage further removals without fully understanding the stock status. Different catch limits would be difficult to manage and coordinate and the immediate impact on vessel value would be significant.</p>
11	<p>Allow one catch limit across all authorised gear types.</p> <p>Descoped due to weaknesses and the contradiction to the FMP and the drive towards more sustainable gear types. Contradicts Recommendation 6 to allow switch from fixed gillnet to hook and line.</p>

Annex 5. Bass authorisation review Task and Finish group membership.

Chris Collins - Chair - Marine Management Organisation.

Joel Brown – Marine Management Organisation. Minutes and actions.

Richard Stride - South Coast Fisherman's Council/Commercial Fisherman.

Jean Duggan - Royal Society for the Protection of Birds.

David Curtis - Bass Angling Conservation.

Andrew Pascoe - Cornish Fish Producers Organisation/Commercial Fisherman.

Neil Witney - Commercial Fisherman.

Edward Baker – Plymouth Fishing and Seafood Association.

Andrew Newlands - Marine Management Organisation, Compliance.

Peter Elliot – Defra.

Grant Horsburgh – Defra.

Andrea O'Shaughnessy - Marine Management Organisation, authorisations.

Hubert Gieschen - Marine Management Organisation, authorisations.

Mat Mander - Devon & Severn IFCA.

Hayden Hurst - Kent and Essex IFCA.

Grant Jones - Bass Anglers' Sportfishing Society.

Steve Pits - Bass Anglers' Sportfishing Society.