

D&SIFCA public consultation - changes to netting permit conditions

Cornwall Bass Investigations Group

Dear colleague,

We are writing to submit a response to the formal consultation on proposed changes to D&SIFCA's netting permit conditions. Our comments are restricted to:

"The opening of a six-month fixed net fishery within Salcombe Estuary (subject to range of management measures".

The [Cornwall Bass Investigations Group](#) have carried out juvenile bass surveys in Cornish estuaries since 1994. Our aim is to monitor the strength of each successive year class, and its first-winter survival, to provide information for the management of bass stocks and research in bass recruitment. Our views, therefore, centre on how the proposed changes might affect these.

Bass tagged in the D&SIFCA study ¹ showed a high degree of site residency to the Salcombe-Kingsbridge Bass Nursery Area (BNA) for most of the year, implying high exposure to the kind of small-scale estuary-based netting activity proposed here.

Byelaw & Permitting Subcommittee members appear to accept that 18.8% netting mortality ¹ for bass is acceptable. We do not, especially since most of the dead fish will have to be thrown away because bass can only be retained for one (i.e. January) of the six months of this proposed fishery. The retention of bass may not even be allowed in January if BNA restrictions are made year-round in the Bass Fisheries Management Plan (BFMP) when published. But, as the D&SIFCA study acknowledges, the mortality rate is likely to be substantially higher than this in real-world conditions. This mortality rate is also dependent on strict compliance with the conditions of the fishery (e.g. soak time); how good will this be? Previous netting in this estuary is known to have occurred at night, when fish are less likely to see the net, resulting in higher catches, and therefore mortality, than was found during the D&SIFCA study.

The loss of bass will be significant. Although this will be greatest during January, when bass could be retained as bycatch, losses will occur throughout the six-month period due to netting mortality. Up to 17 vessels (<6m limit) would be able to carry out netting, and each will be able to deploy 2 x 200m nets. Presumably each net could be redeployed again as soon it has been cleared, multiple times per day.

Bass losses will include juveniles since, as the D&SIFCA study showed, 12% of the bass caught using a 100mm net were undersized (<42cm). This could be even higher, depending on how the net is set. The importance of maximising bass recruitment, in order to boost stocks, is now widely recognised; according to [ICES stock information](#) these are currently below MSY Btrigger.

¹ Understanding Mortality of European Sea Bass (*Dicentrarchus labrax*) in Small-Scale Inshore Netting

BNAs were set up to protect juvenile bass. If implemented, these proposals would set a precedent for other areas, and undo all the progress made in this regard, just when measures to increase the protection of juvenile bass are being considered. D&SIFCA's netting policy would be out of step, and not well aligned with the BFMP (in particular goal 7: ongoing protection of the juvenile and spawning bass stock), including considering a prohibition of fixed netting in BNAs.

Bycatch of other species is also a concern. Birds in particular (but potentially seals as well) are at risk of entanglement with nets. This is likely to be increased when netting is conducted at night.

For the above reasons, we would be very concerned if these changes were implemented.

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