

CALL FOR IFCA EVIDENCE FOR A REVIEW OF BASS NURSERY AREAS (BNAs).

It is widely accepted that there is an international decline in the bass stock. The cause is accepted to be a combination of overfishing affecting adult spawning stock and recent colder winters, reducing survival of juveniles in the nursery grounds. Bass has been declining rapidly since 2012 and will according to ICES reach its historically lowest level in 2016. Bass is popular among recreational anglers and many small scale commercial fishermen also exploit the stock.

Much has been achieved recently to support the recovery of adult bass, such as introducing bag and catch limits and increasing the minimum landing size for both commercial and recreational anglers. BNAs have also played an important part in protecting stocks since their introduction in 1990 by moving the focus of fishing effort away from juvenile bass, the objective being to improve recruitment to the spawning stock and maintaining and increasing yields to the fishery. However, BNAs have been in existence for some time and with declining overall bass stocks it would be prudent to undertake a collective review of current measures in BNAs and their effectiveness.

IFCAs are responsible for the management and enforcement of BNAs and are best placed to provide the necessary information to support this review. The review will provide the opportunity to bring together and consider the information, evidence and the challenges faced by IFCAs in managing BNAs and their current effectiveness in protecting juvenile bass. Going forward will be dependent on the review findings and may lead to the introduction of further measures if deemed necessary. Any such action will need to balance economic, social and environmental impacts.

Bass Nursery Area Review Questionnaire

In answering these questions, please bear in mind that the purpose of bass nursery areas (BNAs) is to protect sea bass in areas where catches of bass below the Minimum Conservation Reference Size (MCRS) predominate. If you have specific evidence or detailed scientific data to support your response, please copy that to us.

Existing Areas

1. Have BNAs have been effective in protecting juvenile bass in your area?

Yes, upon their introduction BNAs provided protection for juvenile bass given that their locations were primarily the result of bass aggregations around power station outflows.

2. Do you consider BNAs to have also provided protection of bass above the current 36cm MLS?

Yes, when BNA's were first introduced, bass were not a year round fishery in the KEIFCA district as they are today. Due to lower sea temperatures, the warm water outflows from power stations in the district acted as aggregation areas for bass regardless of size.

With the increase in minimum size to 42cm undertaking research on the size profile of bass populations in rivers/ estuaries in the southeast would be very useful in answering this question.

3. Are the boundaries of the existing BNAs correct as set out in the current Statutory Instrument (please confirm in the response which BNAs you are referring to, using the list attached)?

Bradwell Power Station – the baffle wall referenced in the SI is no longer in existence which means the BNA is unenforceable. In any case the power station is now decommissioned and warm water is no longer emitted from the power station.

Grain Power Station - correct

Kingsnorth Power Station – correct. However the power station is now decommissioned and warm water is no longer emitted from the power station.

Dungeness Power Station - correct

4. If the answer to 3 is no, could you suggest new boundaries for the BNAs and the rationale for those?

Due to the lack of enforceability relating to Bradwell Power Station, it would be necessary to replace 'the baffle wall' reference in the SI with co-ordinates.

5. Are there any BNAs which are no longer justified (e.g. because of a shift in habitat utilisation, or habitat quality)? If so, could you explain why?

Bradwell and Kingsnorth are no longer working power stations and due to their decommissioning they no longer emit warm water from the cooling outflows. The change in water temperature could change the quantity and sizes of bass that utilise these areas.

6. Some of the BNAs are seasonal. Do you consider this to be appropriate? If not, can you suggest new periods, including any justification for the change?

Given that bass (both adult and juvenile) now reside in the Thames year round and utilise nursery habitats, having temporal closures in nursery areas would now seem illogical.

New Areas

7. Are there new areas where significant or sizeable populations of juvenile bass can be found that might benefit from protection from exploitation either now or in the future? If so, can you give a brief outline of the location?

The Thames Estuary and its tributaries in their entirety provide significant nursery functions for a wide range of species and is one of the primary fish production areas for the southern North Sea. As bass is now a year-round resident of the KEIFCA district it makes use, as a species, of the parts of the estuary which are, ecologically, nursery areas. i.e. saltmarsh areas, the smaller estuaries which feed into the Thames etc.

8. Are there any sources of catch data to support any suggested new areas?

Not of any note. The best data available for the Thames is that collected by the EA as part of their WFD monitoring which would support the above response.

Enforcement

9. How would you describe levels of compliance to BNA regulations within your organisation's jurisdiction?

Unlicensed small scale recreational netting can be an issue especially in the summer months.

10. Can you provide a description of the enforcement your organisation has undertaken in regard to BNAs over the past 5 years? Should this information be available for a longer (or shorter) period, please provide and specify the period. Please also provide figures relating to inspections, warnings or prosecutions.

The three BNAs within the KEIFCA district are covered on routine patrols by KEIFCA vessels. We respond to intelligence and will increase patrols or run specific operations when required. Enforcement levels can vary depending on levels of unlicensed small scale recreational netting.

11. What activities other than enforcement does your organisation do to aid compliance to BNAs e.g. notices to fishermen, website, articles etc.? Have these activities been reviewed for their effectiveness and if so, how effective are they?

We would strongly support a raising of the profile of bass nursery areas through a range of local and national media.

12. What are the main obstacles, if any, to enforcement?

See answer to question 16.

13. There is currently a prohibition on fishing with sand eels. Should this prohibition be maintained? Would it be appropriate to extend the prohibition to other baits?

NA

14. Are there any other types of activity in nursery areas that impact on enforcement? If so how this could be addressed?

Mullet fishing. A mullet permit could be introduced if required.

15. Would additional protective measures for BNAs have an impact on the protection of other species e.g. grey mullet, black bream?

That would depend upon the wording and construction of any new legislation. As in a previous answer, given the use of the Thames by a multitude of species for nursery function, nursery areas in the Thames could improve protection for a large number of other species in their juvenile stages.

16. Are there any other measures which could be taken to improve enforcement of BNAs? For example, deeming clauses, permanent closures etc?

Deeming clauses make enforcement action very clear, especially when the location/size/geography of a site makes enforcement more challenging. They also allow the IFCA to respond to any reported offences by members of the public in a very positive manner. Permanent closures make things far more clear and simple to understand for fishers and members of the public i.e. an area is closed.

Other fisheries (socio-economic factors of the fishery)

17. Do fishing activities for other species potentially impact on bass juveniles?

Yes, the KEIFCA district is characterised by being a mixed fishery.

18. If the fishing activities for other species were restricted in the BNAs, would the vessels affected be:

a. Able to fish elsewhere with little or no effect?

- b. Able to fish elsewhere, but with increased costs (e.g. increased fuel use due to travelling to other areas further away)?
- c. Able to fish elsewhere but with reduced landings (e.g. due to exploiting less rich fishing grounds)?
- d. Unable to fish elsewhere?

This would depend entirely upon the location and extent of any proposed BNAs legislation. KEIFCA would be happy to feedback on any proposals.

19. What level of recreational fishing activity takes place in the BNA? Is this from the shore or boats?

Recreational activity on sites can vary both from shore and boat and have generally reduced in the areas where the power station has been decommissioned as the warmed water tended to aggregate the fish. As with most fishing, fishermen tend to learn the best times and locations to target fish and effort tends to focus at these points.

20. Do you have any evidence of survivability of juveniles from angling in BNAs?

None

General

21. Are you aware of other interested organisations in your local area who should be contacted in connection with this review?

Rochester Oyster and Floating Fishermen

Thanet Fishermens Association

West Mersea Fishermens Association

Southend Fishermens Association

Angling Trust

Kent/Essex Wildlife Trusts

22. Could BNAs in your area support the fulfilment of any other legal requirements (e.g. if they fall within European Marine Sites, or MCZs)?

Yes. 70% of the KEIFCA district is covered by at least one type of MPA designation and in many places, multiple overlaid designations. As such, any restriction on fishing activities for the purpose of a BNA would contribute towards managing effort within designated sites.

23. Could BNAs provide secondary environmental benefits such as reduction in fish discards, or reduction in seabird bycatch?

Again, this is entirely dependent upon how the legislation is worded, where an individual BNA is located and how that piece of sea is used by both fish, fishermen, seabirds and other users. Very simply, yes they *could* provide these benefits provided that the sites were identified carefully and evidenced properly.

24. Could BNAs provide any other socio-economic benefits in your local area (e.g. educational, cultural, and recreational)?

Yes, work KEIFCA are doing in the River Medway at present, working alongside Rochester Oyster and Floating Fishermen, is identifying that a fish nursery area/no take zone in the estuary could have significant local socio-economic benefits. Working with schools and local organisations and enabling the stakeholders to present the Medway in an ecological, environmentally-aware and sustainable manner is of significant interest to all.

25. Do you have any other observations or comments in relation to BNAs?

Please provide a full reference list of quantitative supporting evidence.

Please return completed questionnaire by 22 August 2015 to:

James Towns

James.towns@defra.gsi.gov.uk