

## **Draft HRA for the Essex Estuaries – Paul Gilson**

I have been asked by Kent and Essex IFCA officers to comment on this draft, much of what I have said here we have spoken about. We agree that towed gear must have an effect or influence on the seabed but to what degree is arguable. They asked for my opinion warts and all, I hope I have done just that.

As the authority is held as a body that is trusted and held in some regard by many and whose opinion is respected I feel compelled to give my honest opinion. My comments on this paper are purely facts as I know them, they are not arguments against the site. Some of you may be aware that it was at my instigation that this site was looked at and adopted. If I were to ignore this draft I would be letting the authority down as well as my industry. For those that do not know me I have 45 years of fishing the local areas and I represent the South East on the NFFO executive committee. I served on the old Sea fisheries committee for 15 years and was a member of the Balanced seas group that put forward areas for MCZs. I am at present a member of the sharks and rays group as well as the elasmobranch team.

The draft is well put together and to the man in the street he would be impressed, however it is deeply flawed. The research has been done without any practical knowledge and possibly just a deck top survey. Comments of expert officer knowledge I found deeply disturbing in the context that they were used. One of the things when dealing with subjects like the environment is experience and time served, history. My example would be our cockle industry it works because the authority has been actively working with it for many years and I would not contradict the senior officers when it came to cockles. However there is not that level of knowledge within the authority on history, fishing gear, fish movements and ground knowledge, even your committee members have limited knowledge on these subjects.

On numerous occasions expert officer knowledge is used and the claim that they have at least 50 years of experience with in the industry. I may be wrong but IFCA officers hours are only 35 hours a week most fishermen put in double that. A huge error in this expert advice and knowledge is the complete absence or reference to white weeding, the harvesting of a soft coral. This type of fishing has

been used since the end of the 1940's early 50s. Rakes were towed over the sea bed raking or clawing the weed from the sea floor, some years there could be fifty vessels taking part in the fishery. This happened year in year out with some years better than others with no detrimental effects on the sea bed or what lived there. In some years many hundreds of tons of this coral was harvested and exported all over the world. Many of the grounds around the edge of the Maplins were the most productive within the area and for many other species as well. However this was to change in 2012 when the weed/coral all but died out. (As reported later in the draft) This corresponded with the collapse of sole when reported to those officers of the new IFCA was dismissed as one of those years. However what I am saying is despite the fear now of seabed damage by trawlers this brutal fishery took place without any noticeable effect on the environment. I do remember fishing for sole amongst those weeders while again to no ill effects to the fin fishery. Something happen to the environment when dredging started a coincidence maybe but I do not think so and the IFCA has let the environment, its self and the industry down.

I will try to keep my comments brief it is clear by my notes that if pushed there would be over twenty pages of comment I will endeavour not to go that far but I must cover the main facts so nothing is missed. There will be many that will disagree with my views but that is a democracy

3 Zostra grass, was never under threat from towed gear and only a very small area by dredging for oysters and very remotely cockles. However it is under threat from advancing Spartina grasses around West Mersea Foulness and Two tree Islands.

4. The over view gives the impression that the beds are under threat because of the many boats with in the area. Most of the local boats would be too deep drafted to go there and why would they, what fishery would they engage in?

The number of vessels appear grossly exaggerated for example Southend is credited with 7 boats, where are they? There are only 2.

Fishing activities, Cod and Mullet caught together in the winter? We must be referring to Grey Mullet that are summer visitors.

Native Oyster and American hard shell clams are being dredged despite a bylaw prohibiting the harvesting of natives oysters, by unlicensed and unregistered vessels. Clam harvesting by dredging and hand collecting is taking place in the river Roach and surrounding creeks often from an area closed on health grounds.

5.2 Should read have natural changes. The Buxey and Maplin sands move all the time naturally.

3. The areas around the Maplin sands and Buxey are dynamic with often rapid changes of sea bed from soft sand to mud. This in turn changes the creatures that live there, ie the Maplin's had vast areas of lady stars or brittle stars the sea bed altered over a couple of years and clams and soft shelled urchins replaced them.

4. I believe this research is irrelevant to local areas. For over 2,000 years different methods of fishing has been carried out with in this site.(The Romans exported Oysters back to Rome in barrels of bran by ox cart). If we take this as fact there should be no fish or shellfish living within the site, when in fact it is highly productive.

Vessels have trawled this site for at least 80 years with very similar gear to no obvious detrimental effect.

One of the reference areas has only 40 cm of tidel movement, there can be no relationship when the local tide can move up and down over 6 metres twice a day.

5. Shipping has a greater effect than stated, bow waves or wash from ships creates an unnatural wave and they travel miles. When they meet the shallow waters they often create a breaking wave with very strong undertows. With ever-bigger ships operating within the Thames we can expect to see more of this, as the vessels have to travel at higher speeds to maintain steerage. Several fishermen I have spoken to believe that the noise from some of these ships is detrimental to fish life.

The Gunfleet sands Wind farm appears to have had an effect on the sea bed west of their site. There are more areas of soft sand and mud there now than was evident before the building of the site. (Again several fishermen have reported big changes around the wind farm site since the farm was built).

The Wallasea Island reserve. There is now evidence that the breaking of the sea walls is changing the flow of the tide and sediment's in the Rivers Roach and Crouch as the water drains from the new lagoons. As this has only just happened it will be interesting to see how the site develops and what effect it has on the fish and shell fish in the local areas. It is interesting to note that fin fish have all but disappeared from the Crouch since construction started, Grey Mullet, Bass and most of the flat fish have all but vanished.

Expert Officer Knowledge, this is untrue and patronising. If they were so vigilant why is or has so much fish and shellfish been landed and sold by unlicensed vessels with in the district.

Expert officer knowledge, again this is misleading please remove as it is not clearly expert.

Vessels from Leigh and Rochford had made regular trips to the Wallet and Whitaker channels in recent years after the collapse of local grounds in 2012.

There would appear an increase in fish abundance in the Wallet since that year, with shoals of cod and herring through the winter and then skate and sole far more than is being seen on a regular basis than other grounds. Venturing outside the Wallet channel in the spring is being severely hampered by immense shoals of skate or thornback ray. Their proliferation is now so great that sole fishing is a problem as you cannot avoid them and when you can catch two tons for a few minutes fishing it becomes unworkable. One local vessel caught 4 tons one haul when he was doing a survey for CEFAS last year and he is an under ten. With many boats now working single handed this amount of fish is unworkable for small boats to operate safely and viably. This problem extends all over the Thames and as far south as Dungeness. (I would hope this problem has been reported to you).

Table difference between active and inactive licenced vessels. As above Rochford and Leigh have been far more active in recent years.

Fisher foot print knowledge should be sought as actual ground used is considerably less that thought because so many obstructions and wrecks cover the seabed. Every one of those obstructions is a conservation zone.

Expert officer knowledge is again untrue and patronising. (I repeat my self). If the officers were so vigilant why has there been such an increase in unregulated fishing, landing and sell throughout the district in recent years by unlicensed craft?

Expert officer knowledge again is misleading.

6.2 Anyone involved in fishing knows that the mouth of the river Black water is fished for sole most springs with varying degrees of abundance each year. The mouth of the Crouch is probably under fished as the sea bed is so mobile. The very light fishing that takes place there is so small it is barely worth a mention but a few fish are caught here. The sea bed is so soft most gears just sink in to the ground so the effort required is too great for the returns available.

6.2 Research would have to be carried out regularly as the Maplin and Buxy sands move so much ie the east end of Maplins has move east several miles in recent years joining the Whitaker spit making the area more dangerous than ever for small craft.

6.3 IFCA experts appear to have overlooked quotas restrictions. It also fails to note that the demand for oysters has increased massively and several vessels have diversified to harvest Gigas oyster an oyster that NE want eradicated.

Expert officer knowledge should have highlighted the huge shoals of herring that the industry cannot sell profitably. The catching of Sprat is restricted by quota the amount of quota available makes this fishery unviable. Sprats could never be relied on and with most of the quota in private hands this will probably not change.

In recent years February March and April have seen the herring shoals provide abundant food for Cod and Skate.

Life History, MacAlister Elliot and partners who work for DPW, stated at the public enquiry for the new port at Shellhaven that Dover Sole spawn all over the North Sea not just in the Thames. This was despite the evidence of much higher levels of spawning and juvenile fish in the upper reaches of the Thames collected from CEFAS surveys. (CEFAS were not allowed to give evidence at the public enquiry). Fishermen disagreed but the judge accepted their case and argument and allowed the development and the dredging of Over 30,000,000 cubic tons of seabed

materials. The collapse of some stocks post dredging would back up the fishermen's point of view. The Blackwater saw a significant rise in fish levels especially Dover Sole giving the appearance that the sole had been displaced.

Fishing, the officers of the Kent and Essex IFCA have been repeatedly told of the devastation that fishermen have witnessed. There are many areas of sea bed that now have virtually no fish on them except for skates and dog fish. The spring fishery had never failed before but has done since the dredging started. However the Blackwater has not suffered the same fate and is still vibrant.

The industry believes that the dredging has created leach out from the toxic waste sites from around the upper dredging area this action is well documented it is called liquefaction. Pollutants have acted as a repellent and driven fish away. The Black water and some areas south of the Medway have escaped those pollutants they may have been protected by the Gunfleet sands and the flow from the river Medway?

Officers must be made aware that some fishermen were paid a disruption payment by DPW. To receive that payment they had to sign a gagging clause, some considerable amounts were paid but if they the fishermen or any contractor were to say anything detrimental about DPW they would lose all the money they were paid plus interest. So officers may have to treat some fisherman's comments with caution from the fishermen working up river.

Skate with sole in guts, I have contacted many fishermen over this statement and a few fishermen have seen an odd sole being seen in their stomach but many have never seen one in a life time of fishing. So to conclude that skate are the reason for the decline in sole is pure speculation even fantasy. More sole were seen being eaten off shore than by boats working closer inshore it would appear.

An IFCA officer and a local fisherman were taken to sea on the survey boat to witness the fish survey being carried out by the Ina K to prove how vibrant the fish stocks were. Many hauls had very few to no fish and close to the site only dead fish were caught. Fishermen have witnessed a virtual wipe out of small sole local to the port its self from many thousands of juveniles to less than a hand full when working small mesh gear. There is speculation from sections of the industry that the lack of opposition or comment from the IFCA on this problem indicates

that the IFCA received gifts in kind from DPW, I could not comment but it is odd as the IFCA is charged with issues on conservation.

Figure 6, highlights this, it appears to only be a local issue as sole quota has been raised because stock levels have increased this year

Poor quotas have restricted cod landings; a month's quota could be caught in a few days without much effort. Prices have been poor from the local fish auction at Lowestoft and local markets have been subdued due to sports fishermen selling their substantial catches direct to chip shops, pubs and restaurant'.

6.3.4 This section needs rewriting some bass are trawled but most are drift netted. Sports fishermen catch a considerable number but your IFCA officers should know this.

6.4.2 This needs rewriting as it is misleading.

6.4.5 This is inaccurate

6.5 This has obviously been researched and is not relevant to local boats and their fishing methods. Tickler chains are used mostly on Beam Trawlers not Otter trawlers, this kind of fishing is very rare indeed, too much sea bed life is caught when an otter trawler uses this method and gear damage is substantial with the light gear used locally.

This claim about door penetration is laughable no vessel has the power to tow a door through that depth of mud and why would you?

The clump sledge or skid that are used locally is quite light the claim that it is one third as heavy again as the door is untrue. It is more lightly one third of the weight of the door, my doors would need four men to lift them but I can lift my skid!

The next statement beggars' belief towing a net full of rocks words fail me.

This is obviously computer researched as it bears no resemblance to what happens on local vessels.

Decreased Biomass by sediment covering, Richness and Diversity.

The whole of the Thames Estuary has massive sediment movements with thousands of tons moved naturally every day. The amount moved by ground contact I believe is negligible compared to the natural cycle. The month of May is

renowned for clear water sometimes it is possible to see the sea bed in over 40ft of water towing is often near impossible in some areas as the mud has dropped to the bottom. Divers have told me that the seabed is like a muddy soup when they dive in May and early June but they can see most of the rest. As this happens all the time the biomass must be tolerant of this movement of sediments. When we are talking about the damage to the seabed by doors or ground ropes let us just stand back and look at the bigger picture. We have blow dredging taking place within the district where many thousands of tons of seabed is emulsified and recycled into the water column to be redeposited somewhere else. Yet we are worried about some minor movement by fishing gear, I believe this is total hypocrisy.

To sum up the areas selected are very diverse and dynamic they see strong tides and short wave actions that make it so. I believe it is a very robust environment that can absorb much of human activity, however when that activity reaches the levels we have seen in recent years with wind farms and physically altering the sea bed beyond its natural shape with excessive dredging the environment will change. These changes are a far greater threat to the seabed and environment than limited trawling and dredging by fishermen.

It is also very clear that the IFCA lacks knowledge in many areas it is a huge thing to learn. The restructuring of the IFCA denied the authority that extra knowledge that was available to them by reducing the number of fishery interests. This was not of their doing but they have suffered for it. I have been critical because it has to be said but with so much work for those officers to do you cannot blame them in only getting a brief glimpse of other fisheries other than cockles. The knowledge is out there but they have to talk to those that have it.

Thank you.