

K&EIFCA PROPOSED NATIVE OYSTER PERMIT BYELAW CONSULTATION

Response from Blackwater Oystermen's Association

The answers to many of these of these questions cannot be very definite if adaptive management is to be used, as it should be.

1. Opening the fishery would probably be best during March/April/May allowing oysters to be used for relaying and possible sale for consumption if the quality is good enough whilst also "cleaning" the ground to facilitate spatfall. It should also be possible to open the fishery at other times to enable active management and dredging to thin out stocks or allow sales to be made.
2. Flexible management = flexible areas.
3. Areas should be managed individually with only limited consideration of total stock levels.
4. Ring size needs to be flexible with decisions being made on stock size/size range and market requirements.
5. Permit fee should be £100 max until the value of the fishery is determined.
6. 10 metres is the maximum vessel length at the moment; any increase would only enable increased effort.
7. Maximum aggregate dredge width: 2.4m -- would seem suitable at present.
Maximum number of dredges: 2 – as above.
Maximum weight of dredge: 100kg – seems excessive but further consultation needed.
Construction of dredge: ladder blade – seems best at present but changes could be made.
8. Should not involve much expenditure for most people.
9. A system using mobile phones is in use at the moment and is adequate.
IVMFS could be used but the extra expenditure should be covered by grant aid.
10. Proposed management plan – seems to mean either an open or a closed fishery; no inbetween to allow active management.
800 tones as the starting point -- We understood this was only being used as a theoretical starting point to be replaced when more evidence of the actual stock became available.
The management process – must be active (as above) to at least maintain or improve the habitat.
The criteria needed to make decisions – needs more discussion.
The make-up of the expert group -- needs input especially from the industry and active, practical scientists.
Changes to the proposed management process etc. – more discussion needed.

11. The closure of the restoration box to oyster dredging and harvesting activities.

This should not prohibit activities necessary to maintain the habitat and protect the oysters.

12. The closure of the restoration box to fishing gears that could interact with the seabed.

Trawling, whilst in active contact with the seabed, can be beneficial in maintaining the habitat. Other passive fishing activities should not be harmful.

13. We understand that this proposal has now been abandoned.

14. As 13 above