

Question 1: Do you have any comments or views based on the opening times proposals

The fishery needs to be flexible with active management so will need options of when there is an opening

November/December Sell direct to Christmas higher ring size for market, higher value with lower risk with no relaying

March or April possible sale to market or relay but with higher risk of high oyster mortality from relaying in the shallow, warmer waters

Question 2: Do you have any comments or views based on the areas and boundaries proposed?

The sub-areas are good way manage a fishery allowing parts of the area opened different times of the year

Question 3: Do you have any comments or views on how sub-areas should be opened and closed and the process behind making this decision?

There will not be average stock increase over the MCZ. Some sub-areas could be increasing as well decreasing as a management plan healthy & increasing sub-areas could be commercially fished or with partner funding stock relocated to sub- areas with lower stock densities to increase overall levels in the MCZ

The decision making processes of opening and closing sub-areas should be by a similar process taken by IFCA with the cockle fishery with consultation with active fishermen within the MZC native oyster fishery area

Question 4: Do you have any comments or views on the minimum size or comments on the review process?

I support the conclusions & comments from the KEICA consultation document as out lined below

Increasing or decreasing the ring size can be used as a stock management tool to target different oyster age/ size classes and this flexibility was strongly supported by the oyster industry during initial consultation. It is proposed that 70mm be maintained as the standard minimum size but that the byelaw would allow the ring size to be increased up to 80mm and decreased to 60mm as a response to specific oyster stock population profiles, which would most likely be a particularly strong age class. As with other flexible conditions this decision would be reviewed as part of developing the management measures package for each season and if there were specific advantageous fisheries management or conservation reasons to change the ring size these would be considered as part of this process.

Question 5: Do you have any comments or views on how permit fee costs should be set or the cost of the permit fee?

Is the permit fee set to when the fishery opens for separate limited periods e.g. opens March/April permit fee £150 and maybe opens in Nov/Dec the same year pay another £150?

This needs to be discussed at the 30th October technical panel meeting

Question 6: Do you have any comments or views on the maximum size of vessel that could fish for native oysters under the permit?

Vessel maximum size should be kept at 10m as the very large majority in the MCZ area are 10m and below

Question 7: Do you have any comments or views on the gear controls being suggested?

The dredge must not be 2.4m in total length each maximum dredge length to be set Spacings between the ladder blade runs set at 5cm/7.5cm

Technical panel to clarify the suggested blade length measurement is it 2m 4cm or 2m 40cm

Question 8: Will conforming with these potential requirements incur any additional costs on your business. If yes please could you provide a breakdown of those costs?

Conforming to these requirements will not make any extra additional costs to my business

Question 9: Do you have any comments or views on using vessel tracking systems as a management tool within the fishery

I agree that VMS could be a useful tool for management within the fishery and the comments from the KEICA consultation document as out lined below is the best option

For this reason, it is suggested that the vessel tracking component of the byelaw is retained but that the detail of implementation and running this addressed by the upcoming national process.

Question 10: Do you have any comments or views on:

- **The detail of the proposed management plan?**
- **Using 800 tonnes as the starting point?**
- **The management plan process?**
- **The criteria used to reach decisions?**
- **The make-up of the expert group?**
- **Do you think anything else should be added or removed from the proposed management process, plan or criteria?**

Conservation objectives for the site is stable or increasing and at a favourable condition
The KEICA consultation document as highlighted 800 tonnes starting point for this fishery
I can foresee no commercial activity within the MCZ area in the next 5 years if this is a
trigger point and possibly in the future management priorities by regulators & NGOs could
have changed

Question 11: Do you have any comments or views based on the closure of the restoration box (area 2a) applying to oyster dredging and harvesting activities?

There has been general agreement with the restoration box by industry regarding oyster
dredging and harvesting being restricted in this area but I believe there has been ongoing
discussions regarding size and final location and Natural England requirement of ($\approx 2\text{km}^2$) for
the restoration box

Question 12: Do you have any comments or views based on the closure of the restoration box (area 2a) applying to fishing gears that could interact with the sea bed (e.g. trawling)?

Trawling in the area has not been common in this area now or historically

identifying smaller set-a-side areas in preferred oyster bed habitat.

Question 14: Do you have any comments or views regarding the location or design of the proposed set-a-side areas?
Question 13: Do you have any comments or views on the concept of additional set-a-side areas?

Set-a-side is not the right way forward now as there is not sufficient information of oyster
beds within the MZC

William Baker 18 October 2017

KEIFCA NATIVE OYSTER PERMIT BYELAW CONSULTATION REPLY