

**KEIFCA NATIVE OYSTER PERMIT BYELAW CONSULTATION****Replies to the Consultation Questions  
from Allan Bird****Allan Bird**

Allan working on his oyster layings  
in 'Doitch'

- He has worked for 53 years in Native Oyster culture.
- Began working on the public native oyster fishery in 1964 and finished in 2013, not continually but at least for 35 years.
- Spent 6 years of Native Oyster culture in the rivers Crouch and Roach.
- Member of Balanced Seas representing the oyster industry.
- Worked with Essex Wildlife Trust to gain evidence to designate the BCRC MCZ.
- Member of Enorie representing Blackwater Oystermans Association.
- Director of the Tollesbury and Mersea Native Oyster Company.

Question 1	<i>Do you have any comments or views based on the opening times proposals (above)?</i>
Comment	Adaptive management is necessary. Oysters in the Raysand have traditionally been sold straight to the market in the season. Oysters in other areas may have to be re-laid in the Spring to achieve better meat quality and working the ground at that time would prepare the culch for spatfall
Question 2	<i>Do you have any views how the site is divided up into harvest areas?</i>
Comment	The reasons for doing this are understood but the practicalities could be complex and the problems of bonamia have be taken into account.
Question 3	<i>Do you have any comments or views on how sub-areas should be opened and closed and the process behind making this decision?</i>
Comment	The decision for opening or closing a sub-area must depend on the stock level, the distribution of the year-class and the level of bonamia. Such decisions should be the responsibility of the Expert Group.
Question 4	<i>Do you have any comments or views on the minimum size or comments on the review process?</i>
Comment	I agree with adaptive management because the value to be set for the minimum ring size can be reduced if there is a high bonamia outbreak or if there is a high year class value, or conversely increased if the mature stock level is low. Such decisions can be decided with adaptive management.
Question 5	<i>Do you have any comments or views on how permit fee costs should be set or the cost of the permit fee?</i>
Comment	No comment.
Question 6	<i>Do you have any comments or views on the maximum size of vessel that could fish for native oysters under the permit?</i>

Comment	A large vessel has to have a large return on the investment. To be sustainable there is a limit to the stock that can be taken from the Fishery. There is therefore a balance between vessel size and the number of oystermen involved.
---------	---

Question 7	<i>Do you have any comments or views on the gear controls being suggested?</i>
Comment	I agree that your proposals for the size, weight and number of dredges per boat will limit damage to the Fishery ground but the maximum of 100 Kg weight of dredge seems excessive. Dredge design should however take account of new development.

Question 8	<i>Will conforming with these potential requirements incur any additional costs on your business. If yes please could you provide a breakdown of those costs?</i>
Comment	No comment.

Question 9	<i>Do you have any comments or views on using vessel tracking systems as a management tool within the fishery?</i>
Comment	This will not solve all the problems. More thought is needed which is open for discussion.

Question 10	<p><i>Do you have any comments or views on:</i></p> <p>(1) <i>The detail of the proposed management plan?</i></p> <p>(2) <i>Using 800 tonnes as the starting point?</i></p> <p>(3) <i>The management plan process?</i></p> <p>(4) <i>The criteria used to reach decisions?</i></p> <p>(5) <i>The make-up of the expert group?</i></p> <p>(6) <i>Do you think anything else should be added or removed from the proposed management process, plan or criteria?</i></p>
Comments	<p>The answer to this depends on whether the management of the Public Fishery addresses the conservation objectives of the site. The conservation objectives of the site recognise how important the habitat is for the restoration of the native oyster. If the habitat is not correct, it is very difficult to achieve good spat recruitment.</p> <p>(1) I think that new evidence will show that the valuable sub-tidal mixed sediment is being lost by excluding man's intervention. At the original discussions at Balance Seas it was recognised that man's intervention was necessary to restore the native oyster. I can see in the short term that the easiest way for IFCA is to close the Fishery but, if the evidence shows that this is not working, another way must be found to improve the habitat.</p> <p>(2) No comment</p> <p>(3) This is answered in (1) above.</p> <p>(4) As a practical oysterman, I know that the criteria are very complicated and depend on many differing parameters. More discussion is required.</p> <p>(5) The industry needs to be a big part of this.</p> <p>(6) More work is necessary.</p>

Question 11	<i>Do you have any comments or views based on the closure of the restoration box (area 2a) applying to oyster dredging and harvesting activities?</i>
Comment	I have always supported the restoration box. There needs to be an incentive to get on with the job. However, if there has been no improvement to the site after 10 years of practical experimentation, it should be returned to the public fishery

Question 12	<i>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)?</i>
Comment	Fishing activities within the restoration box which have minimal effect on the sea bed should be allowed and this will gain the support of the local community. A total ban will cause considerable discontent.

Question 13	<i>Do you have any comments or views on the concept of identifying smaller set-a-side areas in preferred oyster bed habitat.</i>
Comment	At a recent IFCA consultation, we understand the idea was thought to be too complicated and has been abandoned.

Question 14	<i>Do you have any comments or views regarding the location or design of the proposed additional set-a-side areas?</i>
Comment	As comment for question 13 above.

I must emphasise that the above answers/comments are my personal views and don't represent the opinions of the groups that I belong to.

Allan Bird