

RECEIVED 03 SEP 2018

29th August 2018

Re. BLACKWATER, CROUCH, ROACH AND COLNE ESTUARIES MARINE
CONSERVATION ZONE NATIVE OYSTER FISHERY FLEXIBLE PERMIT BYELAW

Dear Dominic Bailey,

Thank you for your letter dated 20th August regarding this subject, nonetheless my objection still stands.

Firstly, you state that my objections have been 'considered', however, no amendment has been made to the byelaw. How many objections do you need to receive for you to consider making a change? Is there some kind of points system for this or is it just down to how the committee feels on the day or who it is making the objection?

I know myself several people called and wrote in who have an active interest in the fishery and are expressing concerns over the complexity of the management plan and all these objections seem to count for nothing and have been totally ignored. Maybe you can prove otherwise? I'm interested to know how you determine whether to act on an objection or to disregard it.

I think you have misread my original letter. I quote; 'fishing effort now within the district is at an all time low'. I am referring to the Kent and Essex district as a whole and not the MCZ.

Despite your intentions and good will, there is little chance of this fishery working because of fundamental flaws in the management plan.

- It is totally impossible to gain any true idea of stock levels inside the whole MCZ because of the sheer size of the area, the vast differences in substrates it has and also the sporadic way in which native oysters inhabit the ground.
- You cannot set a TAC for a fishery you cannot accurately assess the stock of.
- Given the criteria you have set to take part in the fishery and the protentional rewards based on market value of native oysters, it is not financially viable.

- The fishery is not going to magically improve all by itself, it needs working. So how you expect the current stocks to increase, and in turn, allow the fishery to open.

I am all for opening and having access to the fishery, but it must be realistic in its management approach.

On the subject of paragraph 5b. If I am fishing for native oysters offshore, outside of the MCZ and outside of mobile phone reception, how do you expect me to call in to you? And also, if oysters are being caught outside of the 6 mile limit, what business is it of yours to want to know where I might be fishing?

I look forward to your answers to these points.

Yours sincerely,



James Elbra