

Addressing the issues from the workshop – *Next Steps*

Feedback from the meeting not only highlighted the difficulty riddles have in accurately sorting specific sizes of whelks, but also emphasised the need for a clearer whelk inspection process. KEIFCA recognises these difficulties and is committed to working with the industry to resolve them.

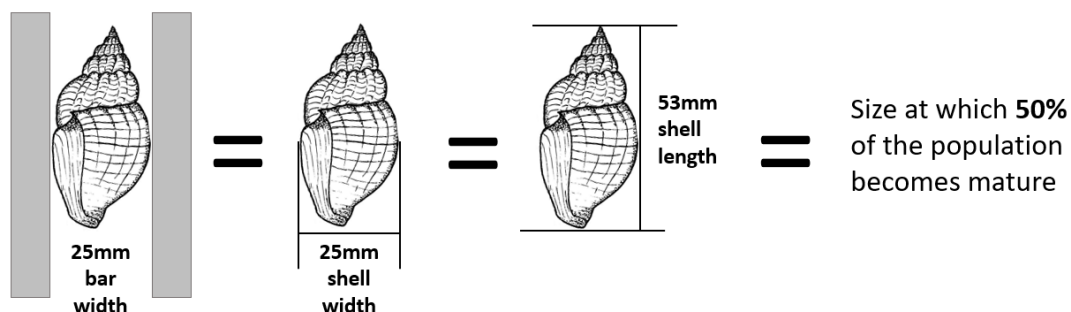
The following are set of suggestions that keep the same management measures in place but are aimed at simplifying and clarifying how this would work. *We would like your input and feedback to these suggestions. Please could you fill in the comment sections below and send back to us using the stamped self-address envelope by the 24th January. All feedback will be sent to Authority members for the next KEIFCA quarterly meeting held at Gravesend on the 31st January when this item will be discussed.*

1) Translating the current riddle gap size into a minimum size of whelk landed.

When the flexible permit byelaw was made, the use of a riddle gap width rather than a specific minimum size was adopted as it was the management approach taken by our neighbouring Sussex IFCA.

In 2017 the Authority agreed to increase the riddle gap width from 22mm to 25mm. The aim of this management measure was to protect the breeding population and in effect increase the minimum landing size of the whelks, moving it closer to a size at which 50% would have been likely to have bred.

Feedback from the industry in general and at the meeting suggested translating the riddle gap width into a 25mm minimum whelk width or the equivalent length (53mm) would help clarify the intention of the byelaw.



Although 25mm width is a straight forward translation from the current riddle gap, due to the irregular shape of a whelk the width of a whelk is difficult to accurately and repeatedly measure as it can depend on which angle you measure it. Source of industries concern about riddling

In addition, having a KEIFCA minimum width (25mm) but an EU/UK minimum length (45mm) could cause confusion and legally there is an expectation that regulators would use a standard measurement technique that is already widely used.

KEIFCA officers have measured the length and width of over 10,000 whelks from around the district over the last 3 years and although there is variation, the large size of the sampling does give us a very accurate conversion factor from whelk width to length.

This suggested measure is more repeatable than the riddling process, cheap and simple for both fishermen and KEIFCA officers to apply but also gives the industry more flexibility in developing sorting processes which will work on fishing vessels of varying sizes.

Suggestion: Convert the current riddle 25mm gap size into a minimum 53mm length

Do you have any comments or ideas concerning this suggestion?

- 1) *Yes! Unfair towards the fishermen who honestly want conservation. Just 25mm riddle should remain and number of pots reduced.*
- 2) *Yes, I can see this working in principal, however if a whelk does manage to drop through the bars and is under 53mm but measures over 25mm depending on the angle it drops through we can blame your conversion factor.*
- 3) *I think this is a good idea in principle as it will create less ambiguity in the rules, but I think more work should be done to make sure it will realistically work rather than working on theories. Although 53mm may be the average size for a 25mm width whelk we will still be effectively measuring across the width with a riddle and I am very sceptical that it may exacerbate the problem of riddling dirty whelks (whelks with heavy growth), in reality meaning we are going to be in a worse state than we are now.*
- 4) *Concern a: 50mm-60mm are, and always have been, the prime eating whelk. The best tasting and texture, a whelk that for generations have been highly prized in the local area by the general public. Concern b: we have to be very careful that measures brought in to increase the profitability and “sustainability” of the fishery leave us without a fishery at all i.e. fishing boats go out of business.*
- 5) *I think to put the size up to 53mm is far too bit. I think the pot limit, 25mm riddle 25mm and 10 holes in the pot at 25mm is more than enough to keep the stocks healthy. 45mm – 53mm is a massive jump.*
- 6) *Having been a fisherman for 20+ years who has always worked to MLS, I would find it better to increase the MLS in line with what is actually being riddled out through the 25mm riddle, so that you don't look in the box of riddlings and see what are actually mostly 'sizeable' whelks under the current EU legislation. It just makes sense and wouldn't affect us at all, as everything passes over the riddle, removes the grey area regarding the difference between the current 45mm MLS and the IFCA byelaw.*

2) A percentage allowance that can be under the minimum size

Building on feedback from the industry and from testing a number of different riddles, developing a percentage allowance under the minimum size, best represents the accuracy of the whelk riddling process and the bulk-quantities in which whelks are landed. For ease of assessment by both the industry and KEIFCA officers, it is suggested that a percentage by weight rather than number would be used. From initial trials by officers, an allowance between 3-5% would be reasonable. It would still be illegal to land whelks under the current EU 45mm minimum length.

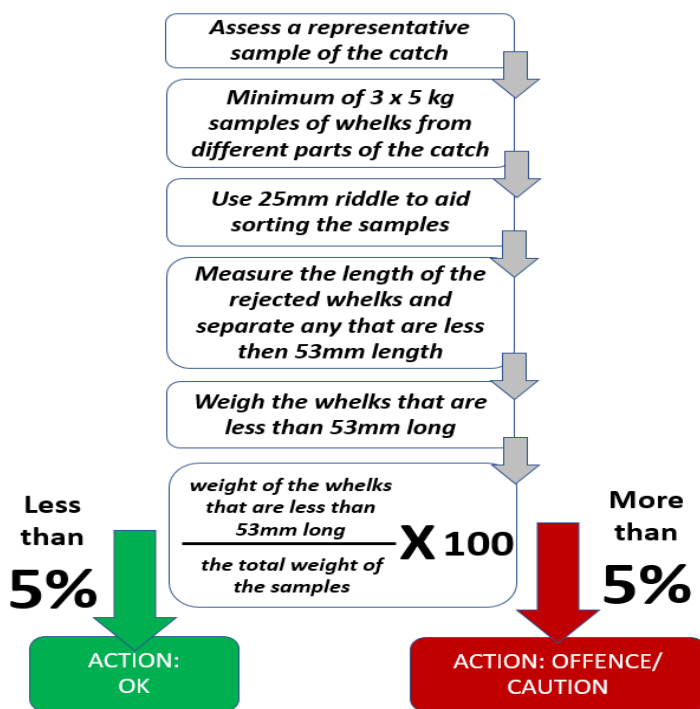
Suggestion: An allowance of no more than 5% by weight of a representative sample may measure less than the specified length of 53mm.

Do you have any comments or ideas concerning this suggestion?

- 1) *With the best of intentions some undersized whelks will always be landed. The only sure way to ensure no law breaking would be to measure every individual whelk which of course would not be possible.*
- 2) *Yes I agree which covers my point above.*
- 3) *I welcome this long-awaited realisation that it is impossible to riddle every single whelk out, especially in areas of dirty whelks. Again, I think before we 100% commit to it, although I think 5% is fair, I am cautious that we may need a few trial runs especially in areas of dirty whelks.*

- 4) *I must say that a 5% margin is far too tight for the industry to comply to. Riddling can be difficult at the best of times. Fishermen all have different riddles and fish in different areas of whelk size population. The whelk population of a smaller size in particular areas will inevitably result in a large proportion of whelks that may not measure over 53mm. Therefore at least a 10% leeway is more appropriate.*
- 5) *I feel it's too low, 5% as a single-handed fisherman may struggle at times in weather to do a through job! Mistakes get made.*
- 6) *I agree there needs to be a small tolerance as no riddle is absolutely perfect. Certainly no more than 5% as that could potentially lead to a fall in the current standards that the fishermen in my area are setting. In my opinion all the boats in my port are currently fishing 'properly' and landing 'properly' riddled catches.*

3) A clear method for assessing the size of whelks in a catch and the percentage allowance that can be under the minimum size



By developing a clear assessment and inspection process, both fishermen and KEIFCA officers will know what to expect and it will help to make the inspection process as quick, efficient and consistent as possible. It is suggested that a clear method would be developed outlining both the number of samples and the weight of samples taken from different parts of the catch. From initial trials and officer experience taking a minimum number of 3 samples of about 5kg could be an appropriate level for a reasonable assessment. If required it would always be at the officer's discretion to take more samples.

Suggestion: A representative sample would be assessed from each landing that would consist of no less than three 5kg samples taken from different parts of the catch.

Do you have any comments or ideas concerning this suggestion?

- 1)
- 2) *Should be allowed a verbal warning, if found to be over again then a written warning.*
- 3) *I think it should be more regimented than a minimum of 3 samples. I think it should be worked out on a fixed percentage, for example take a 1 x 5kg sample per 6-10 bags landed. It is then known what to expect from each other. If it is more than the set percentage under the set MLS then further investigation may be necessary dependant on how far over the set percentage it is. Again, I think we may be rushing into this based on theories and I think it will be prudent to have a trial period to make sure it works. If it doesn't then we need to work together to find the solution. It is important to get this right as the foundation to build on.*
- 4)

- 5) *I think that it is far too hard to standardise the riddle because every area is clearly different! It will be impossible to not get whelks under 53mm in the bag and you will be fining fishermen left right and centre and you well know that!!!*
- 6) *A 10kg sample would potentially be more appropriate, in my experience that would be closer to the volume that we would riddle at a time. Would also make working out whether an offence had been committed slightly simpler, 5% of 10kg is 500g anything over that and there is cause for concern.*

4) Taking the suggestions forward

Agreeing these new rules and putting them into new legislation (an emergency byelaw) would mean that these rules could be most fairly and consistently applied to all permit holders and that all parties would have clarity on what is expected. As an emergency byelaw only lasts up to 18 months, any permanent solution would need to be in the form of a new byelaw which would take into account any learning from the emergency byelaw application.

Suggestion: An emergency byelaw would be made, using the suggestions outlined above to clearly outline the new procedures.

Do you have any comments or ideas concerning this suggestion?

- 1) *Why not reduce the number of pots to 100 and allow whelk fishing to only be carried out between March–October? Many of us do this anyway to allow stocks a chance to replenish and have been learnt this way and have been taught from generation for our own interests and future benefit.*
- 2) *As this is an emergency byelaw and we are taking into account we are learning, use this as a trial period so that we can get this right, keep any offences to a minimum.*
- 3) *As stated throughout the fundamental problem in the past is everything has been based on classroom theories and gone ahead without proper trialling with the people who work with it every day. I agree something needs to be put in place but it has got to be right. We have seen this fishery go from strength to strength, let's not ruin it by going in headfirst and making something inadvertently unworkable.*
- 4) *Without fishermen there will not be a British fishing industry. The whelks are not the only things that needs conserving especially with all the rules and regulations burdening the under 10metre fleet in the last few years. I hope you take this into account when you bring in a measure that possibly could severely affect fishermen's livelihoods.*
- 5) *No need to change; the 25mm riddle is more than enough to keep the stock!! Stop wasting time and money on a problem that does not exist.*
- 6) *No, this seems the natural way forward.*