

Dear Authority Members / Technical Panel,

I would like to start by saying that the industry as yet has not formed a whelk association, as suggested by the KEIFCA because of the differences in opinions and locations between the fishermen in the district. It is worth noting the cockle fishery all fish the same grounds as each other, making it easier to formulate a single voice. We are still looking to form an association but with working over 50 hours per week, COVID, and different areas, it is proving problematic.

Further more, with COVID, there is a huge concern that especially the more technologically challenged fishermen are unable to put their opinions and concerns across. There is also a concern that COVID has restricted the amount of samples the officers have taken from vessels and areas. I believe it is only approximately 30% of permit holders have been inspected in recent months.

With my views, I can only represent the area within a radius of approximately 10 miles from Whitstable, but some of these points may cross reference with other areas in the district.

- We are very concerned with the wording of the new bylaw, especially #22 labelled **flexible permit conditions**. It seems, using this wording, KEIFCA are trying to make the whelk industry the same as the cockle industry. We oppose catch restrictions, time and effort restrictions, spatial restrictions, and electronic monitoring equipment, especially without any consultation. There has been no mention of this change of wording to the industry as far as I know. Catch restrictions are governed by the gear restrictions (300 pots limits the amount we can catch). We do not support spatial restrictions, as it will increase fishing effort in certain areas. We do not support time and effort restrictions, or closed seasons, or anything else, as this fishery has historically been restricted by weather (for small boats), and time in the summer, where the whelks do not crawl. We do not support electronic monitoring equipment, because this is to sustain a small boat fleet, that has terrible trouble with damp and dry space to support any such measures.
- I would like to say I think the 25mm riddle is a good thing in our area and that we are starting to see the benefits of it on the fishing grounds.
- There is a large area of ground that is approximately 15mile square, that has a large proportion of sizable whelks (approximately 70-80%) but are very tight to 25mm wide. The whelks in this area tend to be very "dirty" (barnacles, limpets, ETC), which make it very difficult to always get with the 5% tolerance. This ground is important to us, so we are all not overfishing the ground with larger whelks and with weather periods of sustained offshore winds we need to work these inshore grounds for safety.
- **Rotary Riddles**. I used a rotary riddle supplied by the KEIFCA and I think the idea is brilliant in principle. I found the amount of noise generated by the riddle very concerning with sustained readings of 85-90 decibels. After 1 day, I had a sore throat from shouting over it to the crew, and the crew were complaining of tinnitus. It is worth noting that I could not hear the sound of my engine, and there is no way I would hear a bilge or smoke alarm going off with the riddle in use. They are fairly large in dimensions and weight, so for a small / start up boat, or a boat with a small working area like mine it is awkward to make it fit. This makes it impractical for a young person with a start up vessel to get into the whelk industry like the Chief Fishery Officer has previously declared he would like the industry to be.

- It is unrealistic to expect fishermen to sit there with a stop/go gauge measuring whelks either in their bags or in “the sievings” when we have time constraints of meeting lorries on landing. The lorries are unable to wait for us, as they are booked on set ferries and have to make multiple collections. At the end of the day, I feel we have measured them once when we put them across the riddle.
- I estimate that we move approximately 12 ton in a day, by hand, by the time we have moved each pot 3 times and the bags of whelks 3-4 times.
- There is a lot of ground that is shut off to us at the moment, due to shared interest with trawlers and oyster boats so we are compacted into quite a small area and to not be able to fish the inshore grounds would put even more strain on the ground that other boats are already working potentially causing arguments between fishermen and safety issues with getting each others gear around propellers.
- Fishermen don’t have all 300 pots on 1 patch of ground, we spread them across 4-5 patches to prevent overfishing an area and to methodically work the ground. These patches need to be within a reasonable distance of each other to make sure we meet the time constraints of meeting landing times.
- I am concerned the KEIFCA are effectively pushing rotary riddles on us “through the back door”. When questioning the KEIFCA officers on what I should do about the problems I am facing, their response is you will have to fish the ground with a more effective riddle (IE Rotary Riddle) or move onto areas where there are larger whelks. I find this unacceptable, as historically fishermen from Whitstable have fished these areas for many decades, with flat bed riddles and the fishery has gone from strength to strength. This could also cause overfishing on other areas.
- The KEIFCA have done many studies of whelks and are saying that the average shell height of a 25mm wide whelk is 53mm. I wonder, if to work out that average, was there only 5% of the 25mm wide whelks were under 53mm shell height. **The fundamental problem still exists whereby we are measuring the width using a riddle and the KEIFCA are using the shell height as a measurement.** Like humans, whelks are not all the same shape and size, we have fat ones, thin ones, tall ones, and short ones.
- I hope you can see from the above points the predicaments the new bylaw imposes on some of us, and that 5% is too tight of a margin to guarantee getting within.
- I propose the tolerance should be increased to 10% or the MLS reduced to 51 or 52mm which will theoretically make us fall within the 5% tolerance, as the majority of my “undersized” whelks were 51 or 52mm.

We the here signed below wish to object to the framework of the new bylaw with the above points.

| Name            | Boat Name     | PLN    | Port       |
|-----------------|---------------|--------|------------|
| C. Attenborough | Holladays     | R8     | Whitstable |
| R. Attenborough | Claire Louise | R39    | Whitstable |
| B. Cooper       | Suvera        | HL1054 | Whitstable |
| D. Garrard      | Jacqueline    | Fe63   | Whitstable |

|            |             |       |            |
|------------|-------------|-------|------------|
| M.King     | Le Aimee    |       | Sheerness  |
| R.Foad     | Simon Isaac | RX43  | Whitstable |
| K.Sharp    | KG1         | RX443 | Dungeness  |
| D.Thomas   | Doreen T    | FE 4  | Dungeness  |
| S. Skippon | Oppurtunity | FE6   | Folkestone |
| M.Tart     | Julie Jean  | FE380 | Dungeness  |
| M.Gosman   | Sarah Ray   | R490  | Ramsgate   |
| J. Thomas  | Annalusion  | FE382 | Dungeness  |
| S.Gosman   | Our Kate    | DR165 | Ramsgate   |
| J.Craig    | Hot Shot 3  | CK10  | Mersea     |
| J.French   | Valkyrie 2  | CK5   | Mersea     |