

## Whelk Permit Byelaw 2016

### Informal Consultation August 2020: Outcome



This document discusses the outcome of our informal consultation to review the permit conditions for the Whelk Permit Byelaw 2016. It is a responsibility of the byelaw that the permit conditions are reviewed every four years.

#### We asked

We consulted on the permit conditions for the Whelk Permit Byelaw 2016 in the context of our 2020 assessment of the fishery which highlighted some risks to the sustainability of the fishery. This consultation closed on 1<sup>st</sup> September 2020. We requested comments from industry about:

- The current permit conditions,
- suggestions for future permit conditions and any concerns about current their current practice or the fishery more broadly,
- information about their fishing activity in the wash.

#### You said, and our response

The following key points were highlighted:

You Said	Our Response
<p>There are concerns that the pot limitation (500 pots per vessel) is not being adhered to and that whelk stocks will be impacted as a result.</p>	<p>Officers activities seek to identify pots at sea which are not tagged, and IFCOs have identified several ways in which non-compliant permit holders attempt to avoid detection.</p> <p>In the context of industry and IFCA concerns it is proposed that further permit conditions are introduced to increase the level of deterrence and increase the visibility of non-compliance. The proposed permit conditions Permit conditions are subject to consultation with industry and more information can be found below.</p>
<p>Edible crab should be able to be used as bait.</p>	<p>The byelaw inherited from Eastern Sea Fisheries and Joint Committee prohibits the use of any edible crab as bait, including cooked waste. The intention of which was to reduce the potential for soft, undersize, or sizable crab caught during crab fishing to be used as bait</p>

	<p>undetected. Bait would not be recorded by catch return form requirements.</p> <p>This measure will be subject to review alongside other crab and lobster measures – a workstream which is ongoing – but cannot be resolved using permit conditions under the Whelk Permit Byelaw 2016.</p>
<p>Concern for the use of low-quality plastic pots as encouraging additional effort and that the plastic degrades contributing to pollution.</p>	<p>It is intended that this concern is given more consideration, including via dialogue with industry.</p>

Further comments and observations:

Current permit conditions

- Most respondents agreed that the current permit conditions were effective in ensuring the sustainability of the fishery.
- Most broadly supported the measures for sorting catch, minimum sizes, and internal pot volumes.

Future permit conditions suggested by respondents

- There should be a maximum size in addition to a minimum landing size for whelk.
- Views were polarised on the effectiveness of escape holes, with some believing them to be very effective and suggesting an increase in their use, others reporting that they are ineffective and not used by the whelks.
- Suggestions for managing whelk fishing effort in the wash including limiting access based on track record, reducing number of pots per vessel, limiting access, and increasing pots per vessel, rotating fishing grounds, daily/weekly/monthly quotas, and closed periods.

These suggestions will be considered alongside the ongoing review of the whelk fisheries in the district.

Fishing Activity in the Wash

- Of fishermen fishing in The Wash only one was unable to fish elsewhere.
- There is the potential for displacement into the Lincs Coast and North Norfolk Coast if restrictions are enforced.
- There is a general concern for viability of businesses of associated costs of fishing outside The Wash.

## Outcome

As documented through our comments above, we reviewed all responses to the consultation and will undertake the following:

- Propose the implementation of additional measures: permit conditions and eligibility criteria, to increase the deterrence against non-compliant activity and to assist in the ongoing collection of accurate data. These proposed additional measures can be accessed at the link in 'further information' below.
- Continue dialogue with industry regarding the concern for low quality plastic pots to monitor and further consider their use.
- Better informed understanding following information provided about activity in The Wash to be considered in effort management proposals.
- Consider use of edible crab as bait alongside 'crab and lobster' measures which is an ongoing piece of work.

## Next Steps

In January 2021 Eastern IFCA will begin to consult with industry on the additional measures that were the outcome of this consultation (as above). Keep up to date with the ongoing review of the Whelk Permit Byelaw 2016 and future consultation on our website:

[www.eastern-ifca.gov.uk](http://www.eastern-ifca.gov.uk)

## Further Information

- [Whelk Permit Byelaw 2016](#)
- [Whelk Permit Byelaw: Additional Measures – Consultation, January 2021](#)