

REVISED VERSION of 7 December – map changed on page 4 (to the right)
See more maps: www.eaa-europe.org/topics/sea-bass/measures-2016.htm

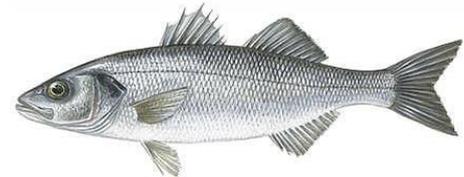
European Anglers Alliance, EAA
European Fishing Tackle Trade Association, EFTTA
Rue de la loi 81a
1040 Brussels
Belgium



Tel: +32 (0)2 725 11 15 • Email: info@eaa-europe.eu • Web: www.eaa-europe.eu • www.eftta.com

Brussels, 4 December 2015

ATT:
The EU Council
The EU Member States
The European Commission



EAA and EFTTA Response to Commission Proposals for Bass Fishing Opportunities 2016

Introduction:

Today, we have received the revised version of the Commission's proposed legislative text¹, which was published 10 November². The revised version now makes it clear that the non-retention period for bass in the first half of 2016 applies to all fisheries, commercial as well as recreational, and not only "Union vessels".

Article 10(4) of the revised text goes on to say, "From 1 January 2016 to 30 June 2016, it shall be prohibited in recreational fisheries to fish for sea bass..." We urgently request that the wording of that sentence is changed to mean "no-retention of bass" instead of "no recreational fishing for bass". No recreational fishing for bass fails to take account of the high rate of survivability of bass released alive by recreational anglers and would needlessly inflict severe economic damage on bass guides, charter vessels, tackle shops, and other associated businesses including tourism.

If the wording is not changed to allow for recreational angling for bass during the 'closed' period we will call on the CFP's Article 15(4)(b) ('Landing Obligation'), which resolves this situation. Article 15 bans discards of species, which are subject to catch limits. However, it does allow for continued fishing for "species for which scientific evidence demonstrates high survival rates, taking into account the characteristics of the gear, of the fishing practices and of the ecosystem;". The survival rate of released bass caught by recreational anglers is evidently "high", and the impact on the ecosystem very low and therefore continued recreational angling for bass can be allowed in the concerned 'closed' period with a "no-retention" rule in place. (NB! We argue on behalf of recreational angling only, not other kinds of recreational fishing).

EAA and EFTTA welcome the Commission's continued efforts to urgently reduce bass fishing mortality.

We agree with the Commission, that: "In light of the seriousness of the 2015 ICES advice, there is a clear need to continue actions to protect this stock and to build on the progress made in 2015 and to provide further protection of the spawning stock, maximise recruitment and reduce the catches of sea bass. The proposed measures are intended to ensure that all those who would benefit from a rebuilt stock contribute to its rebuilding."³

We are well aware that ICES recognises that the fishing mortality of sea bass in the North East Atlantic is currently four times higher than the level which would ensure maximum sustainable yield (MSY) and has advised that catches of sea bass in 2016 should not exceed 541 tonnes. The Commission will aim at achieving MSY in 2017 and has proposed measures which will lead to catches of nearly 1,500 tonnes of bass in 2016.

¹ http://www.eaa-europe.org/files/1-en-act-part1-v3-2_7149.pdf

² http://eur-lex.europa.eu/resource.html?uri=cellar:f4d9701d-87b1-11e5-b8b7-01aa75ed71a1.0011.02/DOC_1&format=PDF

³ Ibid - page 5

We do believe though, that some of the measures proposed can and should be amended to lessen the impact on the recreational sector and its dependant businesses, including tourism.

Anglers have reacted with surprise and frustration to the Commission's proposals, which would see recreational anglers being restricted to only one-fish-per-day during the second half of 2016 while commercial fishermen continue to be allowed to land up to one tonne of bass per month.

Anglers also find the proposed ½ year no-retention period excessively long and 'unfair' and suggest a shorter period and/or other less dramatic measures.

Anglers stress that they are already contributing considerably to fishing mortality reduction through the three-fish-per-day bag limit, which took effect 29 March this year and the releasing of fish below the new Minimum Conservation Reference Size of 42cm with effect from 1 September.

At this point in time the scientific catch data for bass is vague. Therefore, we regard the proposed management measures as "emergency measures", based on precautionary assumptions. The data collection and other sea bass science⁴ will be improved from next year making it possible to introduce more flexibility and spatial measures e.g. seasonal closures, which differ in time from one geographical area to another. It is likely too late for this December Council meeting to deal with, but the added value of fin clipping and carcass tagging should be investigated. Fin-clipping of bass is a legal requirement in France. Carcass tagging is used in some European salmon fisheries as well as striped bass fisheries in the USA⁵ to improve control and enforcement as well as to provide better data for management.

For 2016 we agree the need for further cuts in bass fishing mortality and the need for a no-retention period, which should, as proposed by the Commission, apply to all commercial and recreational fishers. However, we urge that the shaping of the long term management plan – to be developed next year – should not be dictated by these emergency measures, but should instead be based on the best and most recent science available, as well as taking into account sustainability, socio-economics and other aspects, which have not been taken fully into account so far.

NB! We urge all those involved to recognise that recreational fishing is not the cause of the decline in bass – this has largely been caused by increased commercial catches and increasing fishing pressure over successive decades. Until now, little to no effort has been made to manage bass sustainably despite repeated warnings of stock decline by anglers and recreational angling organisations who witnessed the decline in the stock as commercial fisheries became established.

We also stress that recreational angling only accounts for approximately 26 per cent⁶ of the present bass fishing mortality, generates a much higher economic output per landed fish⁷ compared with other fishing segments and has a very low impact on the environment. Recreational angling is a most selective method of fishing, which allows for unwanted fish or fish below the legal minimum size to be returned to the sea with a very high rate of survival.

Suggestions for amendments to the 2016 measures proposed by the Commission 10 November:

Allocation of fishing opportunities – the bass legislation is special

Normally, the fishing opportunities (TACs) are set and allocated at EU level to and among Member States, whereas the allocation to and between national fishing segments and vessels is a matter for the individual Member State alone. However, the allocation of fishing opportunities for bass circumvents the national level as the fishing segments are addressed directly from EU level.

Article 17 of the Common Fisheries Policy "Criteria for the allocation of fishing opportunities by Member States"⁸ sets some criteria, which Member States have to respect and others, which they should consider when they allocate fishing opportunities, e.g.: "Member States shall use transparent and objective criteria

⁴ These two ongoing bass projects will deliver new valuable data:

- the Bargip project http://www.ifremer.fr/bar_eng/The-Bargip-project2 and

- the C-Bass project <https://marinescience.blog.gov.uk/2015/01/06/sea-bass-anglo-french-collaboration>

⁵ www.asmfc.org/uploads/file/55c3bfd5sbfmpreview2015.pdf ; page 6:

"In 2012, Addendum III was approved by the Board. This addendum requires all states and jurisdictions with a commercial fishery to implement a commercial harvest tagging program. The addendum was initiated in response to significant poaching events in the Chesapeake Bay and aims to limit illegal harvest of Striped Bass."

⁶ STECF (Nov 2015) https://stecf.jrc.ec.europa.eu/documents/43805/1281129/2015-11_STECF+PLEN+15-03_JRCxxx.pdf ; page 5, and ICES (June 2015) www.ices.dk/sites/pub/Publication%20Reports/Advice/2015/2015/Bss-47.pdf page 7:

Commercial landings 2014: 2,683 tonnes; recreational fisheries: 908 tonnes ~ recreational of total = 25.3%.

⁷ See for an example this study concerning Sussex, which concluded, page 40: "From the analysis performed in this study it can therefore be inferred that recreational bass fisheries in Sussex have 3.4 times the economic impact in terms of financial outputs to the economy and 3.2 times the economic impact in terms of Employment (FTE)."

www.bluemarinefoundation.com/wp-content/uploads/2014/12/20141128-Final-Bass-Report-BMF-MRAG.pdf

⁸ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:354:0022:0061:EN:PDF>

including those of an environmental, social and economic nature.”, and “Member States shall endeavour to provide incentives to fishing vessels deploying selective fishing gear..”

Does Article 17 apply? Does Article 17 apply also in this bass context where the Commission/Council are not allocating fishing opportunities to the Member States, but directly to the fishing segments – an act which normally lies in the hands of the Member States individually? We would say yes. We find that Article 17 must apply by analogy. And, it must apply to the bass fishery as a whole, commercial and recreational fishing.

Bag limit and Minimum Conservation Reference Size (MCRS)

EAA and EFTTA urge the recreational three fish bag limit should not be reduced

We believe the reduction from three to one fish is disproportionately restrictive compared to what is proposed for the commercial fisheries segments. To the best of our knowledge, a minor percentage of fishing vessels will be restricted by the one tonne monthly catch limit during the open season (2nd half of 2016). Hundreds of small scale fishing vessels can and will continue to catch the same amount of bass – or even more – during 2nd half of next year simply because the monthly vessel catch limits are set above what these vessels caught during that period this year.

According to scientists, a one fish bag limit may also be counter-productive⁹. In fact, the scientists advised (December last year) that a bag limit of 4 bass and a MCRS of 45cm would be the optimal measures to apply to recreational fisheries. Therefore, we insist that the bag limit should remain at three fish.

From what we know, a MCRS of 50cm would make sure that all bass have spawned at least once. Therefore, further MCRS increases should be considered with regard to the long term management plan. This would also reduce the need for a very long closed season.

We recommend for 2016 an increase of the MCRS from the present 42cm to 45cm from 1st September 2016 (which is a year after the latest increase from 36cm to 42cm). We believe this measure would provide as much or more fishing mortality reduction in the recreational fishery as a reduction of the bag limit from three to one fish would. Further, if the proposed no-retention season is taken into account, we cannot see any need for a reduced bag limit. A bag limit less than three bass will have a negative impact on angling dependant businesses and tourism, which should be avoided. In fact, one of the big advantages of recreational fishing is its ability to provide economic activity to local communities both inside and outside the ordinary tourism season. So a long closed season is sub-optimal solution, but we accept it short term as an emergency measure to protect and rebuild the stock more rapidly.

This 45 cm limit should apply to commercial fishing as well of course. A 45 cm MCRS would secure bass fishing mortality reduction in the commercial fisheries across the board. To be fully effective it must be accompanied by moderation in or change of fishing gear (e.g. increased mesh size or shift to more selective gear) or changes in fishing practices (avoid/leave areas with juveniles) to keep down the amount of unwanted catches of juveniles and/or to secure a high survival rate of discarded bass. “Fully documented commercial fisheries” should be a key objective. This MCRS increase would also support our wish for a shorter non-retention season for recreational fishing than proposed by the Commission.

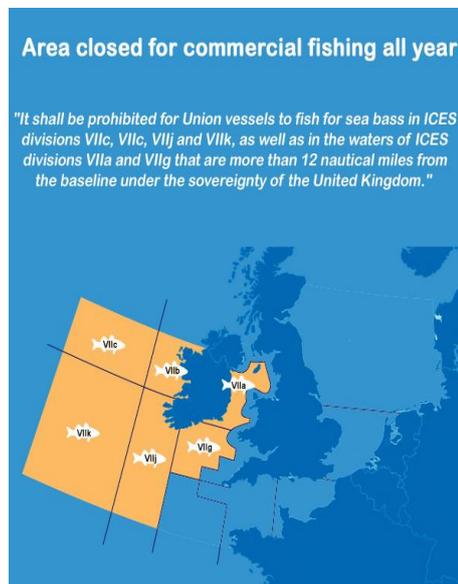
Recreational fishers should be allowed to continue with the present bag limit of three fish per day during the open season - and bag limit flexibility should be introduced as an option. Many recreational fishing days are spent without catching any bass at all. Therefore, it is important that anglers, in particular boat anglers, who generally have higher costs and go out less frequently than non-boat anglers, are allowed to keep more than one fish when the fish are there. Therefore, we propose, that the Member States should be given a free choice, with regard to recreational fishing between: 1) a daily bag limit of three fish, and 2) a monthly bag limit. The Member States which choose the monthly bag limit option would make sure that it does not cause more total fishing mortality than a daily bag limit, and that it is accompanied by an adequate monitoring and control scheme, e.g. log books. The scheme should be approved by the Commission before taking effect.

The ‘non-retention season’

We anticipate that Member States won’t agree to the proposed six months non-retention but a shorter period. In this regard we stress that if the non-retention season is shortened for commercial fisheries it should be shortened for recreational fisheries as well. The non-retention season could be shortened maybe one or two months.

⁹ Request for Services - Sea bass. Commitment No.686192. Paper for STECF, "Assessment of recreational fisheries for seabass", Mike Armstrong (contract lead), Tessa van der Hammen and Ronan Goff Independent scientific experts, UK, Netherlands and France, December 2014 www.eaa-europe.org/files/bass-mis-bag-limit-dec-2014_7078.pdf

We suggest a core non-retention period January to April (4 months instead of 6). We believe bass have spawned in many areas at the end of April, though there are some areas where spawning takes place or continues into May and June. It could be left to the individual Member State to identify and close such areas or by other means protect the spawning fish in those areas (we suggest that different closed seasons for different areas should be considered in the long term management plan when more data is available



– spawning do not always occur at the same time or in the same area from one year to another). We believe that fishing for congregations of pre-spawning bass happens in some areas as early as November/December¹⁰. Therefore, it should be considered to close December as well, but this decision will now have to wait until later next year when this year's December's catch data are available.

For commercial fisheries the vessel limits proposed (1,000 kg/month) should be less for at least some commercial fishers to be fair and balanced across all stakeholders, to reflect the Article 17 provisions as well as contributing more proportionately to lowering total overall catches. As said above, increasing the MCRS seems a fair measure in this regard.

For small scale fishers whose businesses rely more heavily on bass, and who can demonstrate a track record of landings, we support financial compensation for the loss of revenue from bass sales. We also support financial compensation to tackle shops, charter boats and other bass angling dependent businesses, which can prove a loss due to the non-retention season, bag limit or other measures.

Additionally, we support the reallocation of quota of other species to small scale fishers in order to reduce their reliance on bass and to compensate them with alternative fishing opportunities that allow them to stay in business and make money from alternative stocks.

Southern sea bass

We urge strongly that measures to reduce fishing mortality for southern bass are introduced as soon as possible.

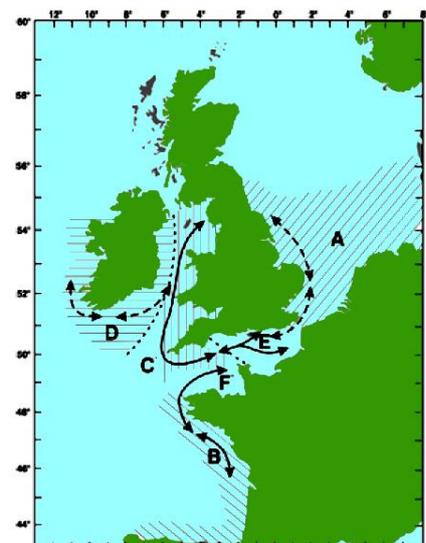
If appropriate measures are not introduced for the southern bass area, we fear that this stock will be overfished soon if not already. Also, sea bass migrate between the two areas and so do fishing vessels but nobody has quantified these overlaps. New evidence to be released shortly by Cefas in the UK is expected to tell more about how the two fisheries are connected and overlapping.

As a minimum of precaution the bass MCRS should be the same in all EU waters and also to secure fair competition among commercial fishers, improve the monitoring and control i.e. to avoid undersized fish being caught in Northern waters but sold as legal-sized fish caught in Southern waters.

For the same reasons, we recommend the same bass MCRS to apply to the Mediterranean Sea and the Black Sea.

ENDS

(Notes to editors on the next page)



The sea areas in which six unit stocks of bass are found

A) North Sea; B) Biscay; C) UK west-south-west coast; D) Ireland; E) eastern Channel, and F) western Channel – south part.

Arrows indicate the main range of movement of adult bass in each "stock", and four hatched areas denote putative biological populations.

Figure from ICES (2004); page 20 (coloured by EAA) www.ices.dk/sites/pub/CM%20Documents/2004/ACFM/ACFM0404.pdf

¹⁰ http://fisheries-conservation.bangor.ac.uk/wales/documents/ThesisCARROLL_ABI_MEP_bass.pdf page 14:

"Offshore, bass are generally caught using pelagic pair trawlers which target congregations of spawning bass between December and April (Pawson et al. 2007)."

Notes to editors:

- **Find more background information in EAA's sea bass dossier:**
www.eaa-europe.org/topics/sea-bass
- **See also: sea bass event at the European Parliament 14 April:**
www.eaa-europe.org/european-parliament-forum/ep-recfishing-forum-events/14-april-2015-sea-bass-event.html

Contacts:

France - FNPPSF:	Jean Kiffer	+33 663 213 609
UK – Angling Trust:	David Mitchell Mike Heylin	+44 794 62 63 131 +44 7836718187
NL - Sportvisserij Nederland:	Jan Willem Wijnstroom	+31 30 60 58 477
BE - Sportvisserij Vlaanderen:	Peter Coene Jim Pauwels	+32 50 42 85 23 +32 50 41 40 77
Ireland:	John Crudden	+353 86 688 56 32
Denmark:	Kaare Manniche Ebert	+45 76 22 70 73
EFTTA:	Jean Claude Bel	+33 (0) 608 062 264
EAA and EFTTA Brussels office:	Jan Kappel	+32 (0)498 84 05 23

EAA, the European Anglers Alliance is a pan-European NGO composed of key angling organisations from 14 European countries with about 3 mill members. In Europe there are about 25 million anglers of which 8-10 million go sea fishing. Sea bass is very important and valuable to the recreational angling community.

Website: www.eaa-europe.eu
Facebook: www.facebook.com/EuropeanAnglersAlliance
Twitter: @AnglersAlliance

EFTTA is a Trade Association for Manufacturers and Wholesalers of sportfishing equipment. EFTTA members can exhibit at EFTTEX, the leading international Fishing Tackle Trade Exhibition. Membership is open to Manufacturers, Wholesalers, Agents and Press in the tackle industry. EFTTA was established in London in 1981, as an international, independent association to serve the European fishing tackle trade by campaigning to promote sportfishing, environmental issues and international business.

Website: www.eftta.com
Facebook: www.facebook.com/pages/EFTTA-European-Fishing-Tackle-Trade-Association

Forum on Recreational Fisheries and Aquatic Environment

EAA and EFTTA provide the forum's secretariat
Web: www.eaa-europe.org/european-parliament-forum

