



National Mullet Club

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24th March 2008

Consultation on a Recreational Sea Angling Strategy for England

Introduction

NMC is a recreational sea angling organisation for anglers interested in catching grey mullet of the three species found in UK waters. NMC has a long-standing interest in conservation of grey mullet and more effective management of the inshore fishery generally.

Enquiries regarding this consultation response should be addressed to the NMC Chairman, David Rigden, as above.

Responses to Consultation Questions

1. What are your overall views on the Strategy? Does it miss anything? Which part would you change and how?

(Section 1.1) The document fails to make clear the full extent of the economic value of RSA *in comparison with commercial fishing*. The simple facts are that the first sale value of commercial landings of all fish species of interest to anglers is in the region of £24M. Even with value added by transport, processing and marketing, this figure escalates only to £100M at most. As stated, RSA contributes £538M to the economy, this before the growth that would ensue if the objectives of this strategy were met, with little or no subsidy from the taxpayer and far less environmental impact than commercial fishing. Similar figures were well understood by the authors of Net Benefits in 2004; years and years of research are not needed to establish the gulf that exists. These facts need to be widely publicised, not hidden from view. Were they properly in the public domain, measures such as the Golden Mile would seem much less contentious and much more politically achievable. (Section 4.12).

There is little mention of the non-monetary value of RSA, be these the health benefits associated with an outdoors pursuit, provision of a constructive pastime for youngsters or the simple enjoyment of a low-stress hobby in an increasingly busy world.

2. How often do you go angling? Where do you mostly go angling? Do you go on angling holidays? What sort of angling – shore, own boat or charter vessels?

When surveyed in 2005, our members fished for mullet on an average of 5.0 trips per month across an average of 6.4 months per year. 71% undertook at least one holiday per year with mullet fishing opportunities.

In both cases it is important to realise that very few of our members fish exclusively for mullet so the totals for all fishing trips/holidays would be significantly higher.

Mullet angling can be practiced in any coastal county in England though predominantly from East Anglia clockwise round to the Bristol Channel. The large majority of mullet angling is shore-based, both open sea and in estuaries. There is a significant amount of mullet fishing from small dinghies and (increasingly) kayaks, but no significant charter fishing for mullet.

3. Why do you go sea angling? What are the key reasons for your participation in the sport? What is the biggest issue for you affecting your angling?

Our members fish predominantly for the (excellent) sporting potential of grey mullet, which are more challenging to catch than many sea species, require more subtle tactics and lighter tackle, and fight harder. Our membership fishes on an almost exclusively catch-and-return basis with no significant fishing “for the pot”. This is reflected across mullet angling generally: Invest in Fish South West data suggested 86% of mullet are returned alive.

The biggest factor affecting mullet angling is the decline in numbers of mullet available due to inshore commercial fishing, especially gill-netting. The decline in catches is approximately 30% over 20 years, reflecting a significantly greater reduction in stocks as we now have a longer season, better tackle and techniques, and greater mobility to fish new venues when old venues are netted excessively.

4. Do you agree with the aim and objectives of the Strategy? Which objective do you think is most important?

The objectives of the strategy are well-founded. We feel more emphasis should be placed on the first objective (“more and bigger fish”) which is undoubtedly the most important. If objective 1 is met, objectives 2 (economic potential) and 3 (increased participation) will flow more-or-less naturally. It is difficult to see how objectives 2 or 3 could possibly be delivered without objective 1 being met.

5. How do you think angling needs can be reflected in fisheries management decisions and policy? What do you think is the best way to achieve this?

At a local level, the proposed changes to SFCs must be seen through and the new bodies must be required to give RSA the development focus called for in the Strategy. SFCs are starting from a very low trust base amongst anglers, and there is an understandable suspicion that a change of name, boundaries and some personnel will do little to correct the ingrained bias in favour of commercial fishing that exists to the virtual exclusion of conservation interests and the interests of anglers and other user groups. Strong central direction is called for.

At a national level, Defra must take seriously its commitment to consult RSA. For example, recent quota reallocations have taken place without consultation of RSA organisations, even though they impinge on inshore fishing for some RSA-important species. Meanwhile, commercial interests are consulted on all aspects of RSA, as the consultation list for the RSA Strategy will testify. Anglers have a right to a level playing field.

At an EU level, the UK Government should press for RSA to be fully recognised as a stakeholder in the CFP.

6. Which species do you value most? What action would you like to see taken to improve these stocks?

Grey mullet, obviously! An NFSA survey in 2006 revealed mullet as the fourth most popular target species among shore anglers in England.

Grey mullet are unusually slow-growing and late-maturing fish. At present the level of commercial interest is limited. In significant part, mullet are targeted with a lucrative potential (and often illegal) by-catch of bass, sea-trout and salmon in mind. The mullet themselves may attract a first-sale price of less than £1 per kilogram; or they may end up as pot-bait. However, as referenced in our answer to Question 3, even this level of exploitation appears unsustainable, at least in terms of providing mullet of a size of interest to anglers.

NMC has written a conservation paper that has been distributed to Defra and other interested parties, see: <http://www.thenationalmulletclub.org/mcpsept06v3.pdf>. The paper makes the case for re-designation of mullet as a recreational-only species. We would expect given their importance to RSA that mullet would be a priority for development of a "species management plan" under the terms of the Strategy and that recreational-status would be given due consideration as part of this, as encouraged by the *Net Benefits* report (2004) and as promised in the *Labour Charter for Angling* (2005). Recreational-only status has been the subject of some misunderstanding, perhaps purposeful, in RSA-circles. Although NMC is broadly in favour of catch-and-release angling, recreational-only status does not equate with compulsory catch-and-release; please see our response to Question 8.

On a shorter timescale, as discussed at our meeting with the Minister in February 2008, there is the potential for the review of bass nursery area regulations to benefit mullet and other RSA-important species such as flounders, as well as bass, if an outcome of that review were to reduce abuse of the nursery regulations and simplify enforcement by prohibiting all netting in the nurseries.

7. If a sea angling licence were introduced and the revenue spent to provide benefits for sea anglers, would you be willing to pay and how much?

At the NMC AGM in February 2008, a substantial majority of members indicated that they would be prepared to pay for a licence in return for a package of beneficial measures. The issue of cost was not discussed explicitly but there is a general assumption of a figure on a par with the EA coarse/non-migratory trout licence at around £25 per annum.

We do not, however, expect a similar response from RSA in general. The timing of this consultation in the wake of the Minister's decision not to implement the bass MLS increase

– with all the frustration, anger and cynicism that has unleashed – could scarcely have been worse. Many anglers rightly point out the inequity of paying a coarse rod licence and getting waters restocked compared to paying a sea licence to have a government-sponsored commercial industry trawl and gill-net fish out.

In such circumstances it is probably as well that the Minister has already decided not to pursue Defra's licensing proposals at this stage. As to the future, we would suggest it would be inappropriate to attempt to reintroduce licensing proposals at least until there has been actual progress in delivery of the "more and bigger fish" objective; and even then it should only be considered in tandem with a time-scaled action plan for further progress.

Progress towards "more and bigger fish" will need to be carefully defined. The recently announced measures to protect tope are welcome to prevent the future development of a targeted fishery, but really only serve to maintain status quo in terms of the commercial by-catch and catch-and-release by (an overwhelming majority of) anglers. Real progress towards "more and bigger fish" will almost inevitably require some level of sacrifice by the inshore commercial industry, if only in the short-term.

8. Would you support a bag limit for certain species where there is a conservation need and there are controls on commercial exploitation of the same species?

NMC does believe there would be potential benefit from recreational bag limits *for some species* as part of a package of measures that also *reduces* commercial exploitation. As much was suggested, for example, in the *Bass Management Plan* produced by BASS and which NMC supported.

It is difficult to see that much practical benefit would accrue from a recreational bag limit for mullet, where the voluntary catch-and-release rate is already nearing 90%. (The same would presumably apply to other species such as wrasse and smooth-hounds that are generally returned alive anyway.) In real terms, for such species, education and encouragement towards catch-and-release would almost certainly yield conservation benefits as great as or greater than bag limits. We can see merits in an argument that it would be equitable to accompany reductions in the commercial mullet fishery with mullet bag limits for RSA; we can see merits in the counter-argument that the decline in the mullet fishery is down to the commercial industry so why penalise anglers? The bottom line is that if bag limits for RSA are deemed politically expedient to speed a significant reduction in the commercial fishery, or recreational-only status, then NMC would find them acceptable.

9. What would you spend money on to improve your enjoyment of sea angling?

NMC would wish to see expenditure primarily targeted at the objective of "more and bigger fish", if necessary buying out commercial licences to create angling-only areas. Rapid progress in this respect need not be prohibitively expensive. For example, there is only one netting licence in effect on the River Hamble estuary in Hampshire, a popular RSA venue. Tagging returns and repeat captures of identifiable individual fish suggest that mullet (often) return to the same area each season so that one might expect the benefits of angling-only areas to accrue in the areas concerned, and not be dissipated around inshore waters generally.

One of the attractions of mullet angling is that it is available in urban areas as well as in "wild" areas of marsh and rocky shoreline. As such, mullet angling can be particularly

appropriate for junior, elderly and disabled anglers. Over the years there has been a gradual erosion of accessible urban areas as piers have closed, dock areas have been shut (often on dubious health & safety grounds) and quayside has been given over to smart housing/marina developments. Expenditure directed at maintaining existing access and restoring some lost areas would be welcome.

10. What new sources of information are you aware of that are available to build an evidence base? E.g. data on catches, social studies, angling business turnovers, numbers of people going on charter vessels year on year etc

NMC has some tag-return data from the 1990s that it has already shared with Mike Pawson at Cefas. We also have aggregated catch statistics over many years that we may be prepared to share, depending on the terms of reference of the study involved.