



SSACN position regarding the EU Commission's proposal for bass measures

Summary

ICES 2014 Bass advice recommends a 20% reduction in bass catches.

We do not agree with the EU Commission's proposal for bass measures for adoption by the Council 15-16 December 2014 as we feel a bag limit for the recreational sector would be an ill-conceived, badly thought out and disproportionate mechanism when all impacts on the stock are considered.

Although in principle SSACN could support bag limits, it would only be if there is sufficient data to support the need and a clear set of management goals and measures aimed delivering a reduction in bass mortality which are targeted at all sectors having an impact on the stocks.

The Commission's proposal as it stands lacks any science based data to illustrate how such a bag limit would help reduce fishing mortality on sea bass given there will only be limited restrictions placed on the commercial sector exploiting stocks.

If there are to be any form of bag limits, we would like Scotland to take the same approach as Ireland and the Netherlands who have introduced tough measures to protect bass stocks in their inshore waters.

Additional Detail

Recruitment has been declining since the mid-2000s, and has been very poor since 2008. The combination of declining recruitment and increasing effort has caused a rapid decline in biomass.

The report goes on to advise that a management plan is urgently needed to develop and implement measures to substantially reduce fishing mortality throughout the range of the stock yet appears to focus on the impact of the recreational sector whilst ignoring the impact of the commercial sector – an approach which is inconsistent with the impact of the two sectors

	RSA %	Commercial %
1970	95	5
1990	50	50
2000	40	60
2012	30	70
2014	25	75

The Scottish Sea Angling Conservation Network - www.ssacn.org – contact@ssacn.org

The recreational fishing bag limit concerns ‘only’ the ICES areas IVbc, VIIa, VIId-h, which means that not all bass fishing areas of France, Ireland and Scotland are within the remit.

Approaches like that show the major dis-connect between the ‘theorists’ of fisheries management and the practical implications of their measures – such an approach will only create confusion as to who is and who is not subject to the limitations and where they apply.

The ICES advice also states *“In the longer term, management of sea bass fisheries could take into account the objectives and the economic and social value of the commercial and recreational fisheries that share the resource, adopting a common methodological approach to estimate the value of each fishery”*.

Our position regarding the ICES advice is that ‘Best Value’ is only achieved if the management of fisheries includes representation from all stakeholders, including that of sea anglers.

There are also doubts as to whether the EU has the legal competence to legislate for a recreational fishing bag limit such as proposed as stated by Ms Damanaki on the 1st August 2013:

“Recreational fisheries activities are not covered by the EU’s exclusive competence with regard to the conservation of fish stocks. Therefore, the rules governing recreational fishing are decided by the Member states themselves.”

With all the above in mind, whilst we agree that there is a need to adopt suitable emergency measures now in order to reduce fishing mortality in line with the June 2014 ICES advice, the suggested recommendations appear to do little to address the main issue of over exploitation, including specifically targeting known breeding / spawning grounds, by the EU commercial sector.