

# North Sea Advisory Council



## NSAC Advice Ref. 03-1617

### Sea bass Management in the North Sea

This paper was approved by the NSAC Executive Committee via a written procedure on the 8<sup>th</sup> December, 2016.

#### **Executive Summary**

This paper provides advice on the impact of recently introduced measures to protect the sea bass stock in the North Sea, Channel, Celtic Sea and Irish Sea, on changes to these measures in 2017 and beyond, and on research and monitoring required to underpin sustainable management of the fishery.

The most recent ICES advice (June 2016) is that the abundance of adult sea bass is now below the historic low recorded in 1992, recruitment has been poor since 2008, landings in 2015 had fallen to around half the peak reported in 2005-2010, and fishing mortality is no longer increasing.

Since 2015 there has been a ban on directed fishing in the spawning season; daily bag limits in recreational fisheries, monthly bycatch limits for different demersal fishing gears and an increase of the minimum landing size (MCRS) from 36 cm to 42cm. The Commission proposal for 2017 includes:

- A moratorium on fishing for sea bass (**professional** fisheries) throughout 2017, with the following exceptions: a) demersal trawls and seines are allowed a 1% bycatch limit for sea bass, that do not exceed 1 tonne per month; b) hook and line only (not fixed gill nets) are banned only in February and March, and allowed a 10 tonnes catch limit per vessel per year.
- In January and from April to December a maximum retained catch of 10 sea bass per fisherman each month in **recreational** fisheries, and only catch-and-release fishing for sea bass, including from shore, allowed in February and March.



The priority is to manage exploitation so that the stock is rebuilt to a level that is biologically secure, and then to aim at achieving maximum sustainable yield (MSY). NSAC notes that ICES does not currently advise on FMSY for the stock, and is not yet able to assess the impact on the sea bass stock of measures implemented since 2014. This creates difficulties for managers to know whether the measures are having the desired effect so that they can be adjusted as necessary in a meaningful timeframe.

As things stand, the bass fishery lacks a coherent rebuilding strategy. We are hampered by the absence of an adequate appraisal of how much has been achieved by the significant measures adopted in 2014, 2015 and 2016. Taking into account the stake of the stock and the absence of a rebuilding strategy work should be commenced in 2017 to develop a recovery plan for sea bass.

It is essential that measures that directly contribute to a reduction in fishing mortality are identified, though unintended consequences (such as an increase in discards due to the increase in MCRS) will determine the rate of rebuilding of the SSB.

In light of these uncertainties, NSAC advises that research be undertaken to:

Estimate the impact of the measures implemented in 2015 and 2016 on stock biomass, population size structure and other factors that may have a positive or negative effect on recruitment of sea bass (e.g. climate effects);

Improve the scientific basis for an assessment of stock status, including examination of regional differences in stock dynamics;

Evaluate changes in exploitation pattern (catch at age/size) on discarding and estimation of FMSY;

Ensure a coherent and joined up approach to research and monitoring of sea bass, both with in the scientific community and with fishers, in particular, investigate sources of data that provide up to date estimates of recruitment the North Sea and post-capture survival;

Assess the extent fishermen have voluntarily increased mesh sizes as a result of the MCRS increase to 42 cm, and the socio-economic effects of the impact of the 2016 measures on all stakeholders;

Review the timing of fishery closures to protect the most vulnerable pre-spawning and spawning aggregations across the “northern” stock’s range.

Each sector - directed, recreational and bycatch fisheries – must take a responsibility to contribute towards the requisite reduction in fishing mortality on the stock.

In the North Sea, the **directed** sea bass fisheries tend to be seasonal small-scale rod and line, static and drift net fisheries that take proportionally smaller catches of bass than the mobile pelagic trawl fisheries in the Channel, which nevertheless make up a valuable component in annual earnings. Vessels for which a *targeted* bass fishery is no longer a viable option are likely to target other species in mixed fisheries.



NSAC members representing **recreational** fishing believe recreational fishing has been hit disproportionately hard by the 2016 measures and consider that there are few options remaining for further reductions to mortality within this sector.

Around 40% of fishing mortality on sea bass is attributable to vessels for which bass is not a target species. Given the range of gears, areas, and types of fishing operation involved, this **by catch** represents a major challenge to the design and implementation of a conservation strategy aimed at controlling overall fishing mortality on bass, whilst minimising discards. It will be necessary to develop formal or informal avoidance strategies for the bass fishery, which could include real time closures and gear selectivity in order to meet the entry of sea bass into the Landing Obligation, due by 1<sup>st</sup> January 2019.

There is concern that the new regulations are not being universally respected or enforced effectively. In particular, unreported sale of sea bass direct to the public and from unlicensed fishers (anglers and netters) pose a serious challenge for the accurate monitoring of bass catches, and for stock assessments. The accuracy of landings data for sea bass from all commercial and recreational fisheries has to be improved, and carcass tagging schemes, among others, should be considered to help traceability from boat to plate.

Member states must ensure adequate resources are deployed to achieve effective monitoring and enforcement of the new regulations across all catching components, and that they are provided with clear and accurate information regarding the state of the stock and new regulations.



## 1.0 Background

- 1.1 The purpose of this paper is to provide advice to the European Commission, Member States and the European Parliament on the effectiveness and impact of the sea bass measures introduced in 2015 and 2016, and to propose changes to these measures or additional measures for 2017 and beyond that will contribute towards recovery of the stock and decreasing mortality to sustainable levels. It also suggests research and monitoring required to underpin informed decisions about the future management of the fishery. Finally it presents options for improving enforcement.
- 1.2 The most recent ICES advice regarding the state of the “northern” sea bass stock in Divisions 4.bc and 7.a,d-h (north Sea, Channel, Celtic Sea and Irish Sea) (June 2016) is based on an assessment that shows the same trends as those carried out previously: the abundance of adult sea bass has continued to fall from a high point in 2010 and is now below the historic low recorded in 1992: recruitment has been poor since 2008, though the 2013 year-class is estimated to be above-average; landings in 2015 had fallen to around half the peak reported in 2005-2010, whilst fishing mortality is no longer increasing. ICES advises that when the precautionary approach is applied, there should be zero catch (commercial and recreational) in 2017.
- 1.3 Given the depleted state of the sea bass stock the priority is to manage exploitation to protect both the adult spawning stock (to safeguard its reproductive potential) and juvenile fish recruiting to the fishery. Managing for sustainability requires the stock first to be rebuilt to a level that is secure, in a biological sense, at which stage management can begin to aim at achieving maximum sustainable yield (MSY). Considerations of managing against a target of FMSY (the fishing mortality rate associated with MSY) are therefore premature, bearing in mind that ICES carried out a benchmark of the sea bass stock in Dec 2015 - March 2016<sup>1</sup> at which it was agreed that the estimate of FMSY in the original advice is no longer valid, and this has not been updated.
- 1.4 Given the continuing perilous state of the sea bass stock, which continues to decline, the EU has proposed measures to strengthen the protection for spawning aggregations in 2017. It proposed that on the basis of social and economic impacts, limited fisheries using hooks and lines should be permitted, while vessels using demersal trawls and seines are allowed a limited by-catch of sea bass. Catches of recreational fishermen should be restricted by a monthly rather than daily limit.

In essence, the proposed measures for 2017 provide:

- A moratorium on fishing for sea bass (**professional** fisheries) throughout 2017, with the following exceptions: a) demersal trawls and seines are allowed a 1% bycatch limit for sea bass, that do not exceed 1 tonne per month; b) hook and line only (not fixed gill nets) are banned only in February and March, and allowed a 10 tonnes catch limit per vessel per year.

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[file:///C:/Users/User/AppData/Local/Microsoft/Windows/INetCache/IE/ZO7PMTNH/01\\_IBPBass%20Report.pdf](file:///C:/Users/User/AppData/Local/Microsoft/Windows/INetCache/IE/ZO7PMTNH/01_IBPBass%20Report.pdf)



- In January and from April to December a maximum retained catch of 10 sea bass per fisherman each month in **recreational** fisheries, and only catch-and-release fishing for sea bass, including from shore, allowed in February and March.

There are concerns within the fishing industry that further layers of measures are being applied without an adequate understanding of the impact of those already in place. Proposals for 2017 may lead to a significant discard problem without an adequate catch or bycatch allowance, as seen previously in the trawl fishery.

## 2.0 Current Management Measures

- 2.1 The existing measures (adopted in December 2014 and December 2015) which impact on the fisheries for sea bass are:

[http://ec.europa.eu/fisheries/cfp/fishing\\_rules/sea-bass/index\\_en.htm](http://ec.europa.eu/fisheries/cfp/fishing_rules/sea-bass/index_en.htm)

### 2015

- A ban on pelagic trawling (February to April 2015)
- A maximum retained catch of 3 sea bass per day in recreational fisheries (April to December)
- Monthly catch limits for different demersal fishing gears (July to December)
- Increase of the minimum landing size (MCRS) from 36 cm to 42cm (permanent measure)

### 2016

- A moratorium on fishing for sea bass (recreational and professional fisheries) from January to June with the following exceptions: a) demersal trawls and seines are allowed a 1% bycatch limit for sea bass; b) hook and line and fixed gill nets are banned only in February and March, and allowed a monthly catch limit in other months.
- From July to December monthly catch limits apply to all vessels and a maximum retained catch of 1 sea bass per day in recreational fisheries.

## 3.0 Evaluating the impact of 2015-2016 management measures

- 3.1 ICES claim that it is difficult to assess the impact on the sea bass stock of existing measures implemented since September 2015, in part due to the number of sea areas covered by the stock assessment and because the dynamics of the stock depend mainly on relative abundance of young fish (recruitment), which in turn is highly dependent on environmental influences. There is no clear relationship between spawning stock biomass (SSB) and recruitment in sea bass; the relative abundance



of incoming year classes appears to be almost entirely driven by climate effects (warmer winters in particular have produced large year classes); and the strength of recruitment is only apparent in the fishery (and SSB) at ages 5-7. In addition, inaccuracies in the catch data create uncertainties around the current assessment (ICES 2016). The delay in evaluation of the management measures creates difficulties for managers and decision makers who, ideally, would like to know whether the measures implemented are having the desired effect so that they can be adjusted as necessary in a meaningful timeframe.

- 3.2 It is essential that those measures that directly contribute to a reduction in fishing mortality and to which changes in SSB levels can be attributed (as opposed to recruitment effects) are identified.
- 3.3 Evaluations by ICES and STECF will ultimately provide an understanding of overall mortality on the stock. Experience tells us, however, that at the level of an individual fishery, measures to reduce fishing mortality may also have unintended consequences for example an unintended increase in discards or create an incentive for illicit unrecorded landings. The balance between these outcomes will determine the contribution towards the overall reduction in fishing mortality and therefore to the rate of rebuilding of the SSB.
- 3.4 It should be noted that the Netherlands commissioned LEI (research institute) to undertake an evaluation of the 2015-16 measures<sup>2</sup>. This gives a first indication of how restrictive the measures may have been to Dutch vessels and how compliance with these measures has been followed. This analysis reveals that, for the Dutch fleet and given landings statistics for 2014 and 2015, the measures have been most restrictive to the Dutch fly shoot vessels. For the hand liners the closed season is likely to be more restrictive than the monthly catch allowance, as monthly vessel landings greater than 1000kg/month occurred in 2014 and 2015. For the demersal trawls (in 2014 and 2015) catches exceeding 1000kg/month were also rare; the later also seems to apply to the demersal trawls (excluding fly-shoot).
- 3.5 In light of these uncertainties NSAC suggests the following research be undertaken:
  - I. An assessment both in terms of changes in fishing mortality and in stock biomass in the whole of the 'north' area. This should estimate the impact of the measures implemented in 2015 and 2016; the impact of reduced sea bass landings on stock biomass and demography (population size structure - effects on stock dynamics will only be revealed slowly): and focus efforts on other factors that may have a positive or negative effect on recruitment of sea bass (e.g. climate effects).
  - II. An analysis of gear changes as a result of the MCRS increase from 36 cm to 42 cm in order to assess the extent fishermen have voluntarily increased mesh sizes and the costs of implementing these changes.

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<sup>2</sup> (Strietman and Op de Weegh, 2016. Indicatieve Impact maatregelen zeebaars; Een eerste indicatie van de mogelijke impact van zeebaarsbeschermende maatregelen op de Nederlandse zeevisserij. Wageningen, LEI Wageningen UR (University and Research Centre), LEI Nota 2016-007 )



- III. Effect of changes in exploitation pattern (catch at age/size) on discarding and estimation of FMSY, noting that ICES no longer has an estimate of FMSY and is advising on the basis of applying the precautionary principle (see 1.2 and 3.0 above).
- IV. An assessment of socio-economic effects of the impact of the 2016 measures on all stakeholders including those directly involved in bass fishing (commercial and recreational) and support industries such as charter boats, the tackle trade (both recreational and commercial), tourism, fish selling and other businesses.

#### **4.0 Improving future stock assessment and data collection efforts for better management**

- 4.1 An accurate assessment of stock status is very important and all parties must collaborate in contributing towards improving the scientific basis for these.
- 4.2 ICES evaluation assumes that the "northern sea bass stock" is homogeneous and independent of sea bass in the Bay of Biscay and south and west of Ireland. The abundance indices used in the model are considered representative of the entire area, which is probably not the case. Fishery data and investigations show that the dynamics of sea bass in the North Sea during the 1990s and 2000s were quite different from those of the population on the West coast (changes in migration patterns, substantial increase in abundance and spread of the stock into Norwegian waters).
- 4.3 NSAC recommends that separate assessments for the original ICES "stocks" (at least in areas 4 and 7d; and on the west UK coast, 7a, e,f,g,h) are carried out with appropriate biological parameters and recruitment information, emphasising the period 2000 - 2015. However, we do recognise that the current assessment is the best available evidence and that it will be used for management advice in the foreseeable future.
- 4.4 In this context, NSAC would like to see an evaluation of the potential for improving landings and discard data for sea bass from all commercial and recreational fisheries. It is possible that the exemptions within the control regulations (Appendix 1) are impeding accurate recording of catches. An assessment of these exemptions would help to quantify the levels of unreported landings and to identify which exemptions contributed most to unreported landings. Efforts to improve catch data should include greater efforts for sampling and monitoring by-catches and discards in important by-catch fisheries (see section 8 below). The discard sampling rate under the DCR in certain components of the fleet (such as the fly shoot fishery in the Channel) is extremely low, despite such metier's being potentially significant in terms of their contribution to fishing mortality in sea bass.
- 4.5 NSAC urges all concerned to ensure a coherent and joined up approach to research on sea bass and continued support via EMFF. There are a number of seemingly standalone projects going on at present, including the BARGIP research programme, work undertaken by LEI, IMARES and the C-Bass project by CEFAS, and it is vital for all concerned within the scientific community to work together in this respect. ICES could help co-ordinate these efforts



- 4.6 Continue research on identification of spawning and nursery sites throughout the species range and especially in the North Sea. Currently, ICES estimates year-class strength prior to recruitment to the fishery using only the dedicate survey in the Solent and a general bottom-trawl survey in the English Channel, and seems not confident in predicting the most recent year-classes. NSAC recommends the reintroduction of the pre-recruitment survey in the River Thames which will provide Member States and the Commission with a much better idea of recruitment within the North Sea. Further, the Dutch research institute IMARES has recently carried out an analysis of available survey data, pointing to some spawning and nursery areas in Dutch waters. NSAC suggest EMFF funding is allocated to pay for pre-recruitment surveys, and that all the available information should be incorporated in ICES assessments to give up to date estimates of recruitment.
- 4.7 NSAC would welcome more collaborative research programmes, engaging fishers and scientific institutions to generate data in a cost-effective way, often covering the whole year cycle. The data from the F-project in the Netherlands was recently combined with landing data and data from research trips (mostly on board commercial vessels). The analysis produced a picture of the volume of landings and discards which reflected the industry's understanding. In England and Wales, a fishermen's voluntary logbook scheme has been used by Cefas scientists to estimate annual catches by metier since 1985.
- 4.8 NSAC suggests that the timing of the closure for fixed nets and hook & line be reviewed for the North Sea in light of evidence that bass in the North Sea spawn later in the year than in the Atlantic and English Channel. This could mean moving the closure from February – March to May – June in order to protect spawning stocks in the North Sea. Similarly, LIFE has proposed shifting the closure for active gears to November –May to protect the most vulnerable pre-spawning and spawning aggregations across the “northern” stock's range. Data from the egg and larvae surveys in the North Sea and Channel, reports from professional and recreational fishers on catches of egg carrying females has been used in the past to provide evidence regarding the extent of the spawning season in different sea areas. NSAC suggests that this needs updating.
- 4.9 NSAC also advises that existing research on post-capture survival (or inferences from tagging studies, e.g.) should be compiled and analysed to help evaluate implications for the sea bass fisheries in advance of the species falling under the Landing Obligation for demersal fisheries.

## **5.0 Future Management Considerations**

- 5.1 The European Commission has proposed a mixed species multi-annual management plan for the North Sea, though sea bass is not included within this plan. To date no one has provided a clear summary of the benefits and drawbacks of a single species versus a multi-species plan. NSAC believes that a cost-benefit analysis on the inclusion of sea bass in a multi-species plan would help to assess the appropriateness of managing bass alongside other species.



- 5.2 The immediate challenge facing the bass stock and, therefore, the bass fishery, is to put in place an interim rebuilding strategy for the stock, based on proportionate and effective measures.
- 5.3 The European Commission has recently proposed a mixed fishery plan for the North Sea. A similar plan for North Western Waters is expected shortly and follows the adoption of the first new generation plans in the Baltic. The North Sea Plan will now enter the co-decision process. The proposals understandably take the form of legislative language and perhaps because of this there remains a considerable degree of uncertainty over how stocks, like bass, which extend over more than one area of jurisdiction/plan will be treated. It will be important to obtain some clarity on this fundamental question to permit us to work on a long-term plan for sea bass.
- 5.4 Given the areas in which bass populations can be found, the UK's impending departure from the EU is a relevant factor in future management considerations.

## 6.0 Controlling Mortality

- 6.1 Given the severely depleted state of the sea bass stock and the urgent need for rebuilding, it is clear that each sector - directed, recreational and bycatch fisheries – takes a responsibility to contribute towards the requisite reduction in fishing mortality on the stock.

### Directed Fishery

- 6.2 Prior to 2014, the directed commercial fishery accounted for approximately 30% of the fishing mortality on bass. The management measures adopted in 2014 and 2015 impacted most immediately and severely on this section of the fishery. In effect, the measures ended the *directed* pelagic trawl fishery, by introducing a moratorium during the period when spawning aggregations formed the basis for the fishery. Although it is notoriously difficult to disentangle the impact of specific measures and the degree to which these have contributed to an overall reduction in fishing pressure, when introduced simultaneously with other measures, ICES considers that the achievement of an overall 30% reduction in fishing mortality is “plausible” in 2016. It is likely that the directed fisheries have accounted for most of this reduction. This has not been without serious socio-economic costs nor without unintended consequences, such as displacement into other areas/fisheries.
- 6.3 In the North Sea, the directed fisheries have tended to be seasonal small scale rod and line, static and drift net fisheries rather than the more mobile pelagic trawl fisheries in the Channel. Catches of bass have been proportionally smaller, although they do make up a valuable component in annual earnings. Outside the moratorium period/derogation and subject to maximum catch limits, small-scale fisheries continue, with some reported to be severely constrained. A total ban on the landing of seabass by these traditional small scale fishers, as the Commission proposes, should be reconsidered. Environmental NGOs believe this could be reconsidered if significant reductions in total mortality are achieved through other measures; sufficient to clearly start recovery of the population.



- 6.4 Vessels for which a *targeted* bass fishery is no longer a viable option are likely to target other species in mixed fisheries, for which bass may be a *bycatch* and, as such, subject to bycatch limits.

### Recreational Fishing

- 6.5 NSAC members representing recreational fishing believe recreational fishing has been hit disproportionately hard by the 2016 measures and consider that there are few options remaining for further reductions to mortality within their sector.

### The Bycatch Fishery

- 6.6 ICES estimates that around 40% of fishing mortality on sea bass within a mixed fishery is attributable to catch by vessels for which bass is not the target species. Given the range of gears, areas, and types of fishing operation involved, this represents a major challenge to the design and implementation of a conservation strategy aimed at controlling overall fishing mortality on bass.

- 6.7 The term *bycatch* is very broad. By-catch is considered 'unintended catch', but from an economic stand-point can encompass 'unwanted by-catch' and 'wanted by-catch'

- Unwanted by-catch – catch that has no or little commercial value and/or cannot be legally landed (e.g. prohibited species or, for species not under the Landing Obligation below MCRS);
- Wanted by-catch (also known as by-product internationally) which is not a "target" species but has a high economic value and is therefore a significant component in the annual income of the vessels concerned. Due to the species high economic value, sea bass by-catches (above the MCRS) have generally been landed and marketed.
- Wanted by-catch which has a significant economic value but in the demersal fisheries currently must be discarded to comply with catch limits or catch composition rules
- By way of illustration, in some ultra-mixed fisheries, up to 40 species are retained, of which bass is only one, and it is questionable whether the term *bycatch* is relevant or helpful

- 6.8 Sea bass is caught as bycatch in the following gears:

- Otter trawl
- Beam trawl
- Fixed gill net



- Trammel net
- Seine net (fly shooter)
- Drift net

- 6.9 The management challenge in fisheries in which bass are caught as a bycatch is how to effect a reduction in fishing mortality, whilst minimising the potential to create a new discard problem. Until the EU landing obligation applies to the species, bass caught in excess of bycatch limits of monthly catch limits must be returned to the sea.
- 6.10 Although some degree of avoidance is possible, it is thought that, in the mixed fisheries, vessels will continue to catch bass in various commercial gears. The proportion that survive is open to question but is considered to be low. The potential of by-catch avoidance measures should be investigated in order to understand the most effective strategies for reducing sea bass by-catch mortality.
- 6.11 The lesson from other fisheries, not least in that for North Sea cod, is that decreasing catch limits without concomitant changes to fishing strategies/tactics will result in a significant discard problem. In the North Sea cod fishery, reduced TACs without accompanying avoidance measures led to the situation where one cod was discarded for every one retained. It this counterproductive approach is to be avoided in the bass fishery it will be necessary to develop formal or informal avoidance strategies:

The potential measures include:

Real Time Closures: This approach has been fruitfully applied in the North Sea and has contributed to rebuilding the stock and to reducing the discard rate. However, given the mobility of bass there is less confidence that this type of closure will be in the right place at the right time.

Gear Selectivity: Trials are in development to investigate whether net geometry could be adjusted to release *unwanted* catches of bass.

Real Time Information (RTI): There is evidence from other fisheries (Yellow Flounder in New England, Spur dog trials currently under way in the UK and also from the bass fishery itself) that the rapid promulgation of information about aggregations of bass can provide vessel masters with the basis to adjust their fishing strategies to avoid catches below the MCRS or in quantities above those that could be retained on board. Fishers using gear that represents a threat to juvenile sea bass could avoid significant shoals in both the North Sea and Eastern English Channel with the introduction of RTI systems to report such congregations.

The above mentioned strategies should be evaluated in terms of their potential to contribute to the reduction of sea bass mortality in by-catch fisheries. It is thought that real time information will be the most relevant and fruitful approach to secure a reduction in fishing mortality in mixed fisheries catching sea bass.



## 7.0 Landing Obligation

7.1 From 1<sup>st</sup> January 2019 at the latest, (depending on phasing arrangements) it will become a legal obligation to land all bass caught in the demersal fisheries, unless a specific high survival or *de minimis* exemption is applied. The latter would be on the grounds of obstacles to selectivity or disproportionate costs (Note catches of bass already fall under the landing obligation in pelagic fisheries<sup>3</sup>). As for NSAC advice previously submitted on the landing obligation<sup>4</sup>, it is essential that complementary commitments be made by Member States to support improvements in selectivity, monitoring, and best practice incentives, before the obligation applies to each of the species (in this case bass) subject to the landing obligation. Enhanced monitoring of catches in particular will be important to provide accurate data to inform stock assessments.

## 8.0 Monitoring, Enforcement, and Traceability

8.1 The effectiveness of management measures to facilitate recovery of the sea bass population and to fish at sustainable levels is dependent on the degree to which they are fully implemented and adhered to by the various fleets: buy-in from the catching sectors is required. There is a need to better communicate with the various fleets and sectors catching sea bass in order to help all fishers understand why measures are being implemented, what they are trying to achieve and the benefits that they will bring. Should measures be effectively applied, all sectors stand to gain a huge amount through increased catches of one of the most valuable seafood species in our waters. Presently, there is concern that the new regulations are not being universally respected or enforced effectively. In 2014 ICES stated that the actual landings of sea bass from commercial vessels in UK were likely to be on average around three times higher than the official statistics.<sup>5</sup> In 2015 and 2016 enforcement agencies have been unable to effectively control illegal landings. Such a level of unreported fishing fundamentally undermines attempts to manage sea bass and attempts and sacrifices of others to improve the stock. This must be addressed as a matter of urgency. It is crucial that measures are taken to establish the true level of total catch.

8.2 The unreported sale of sea bass from commercial vessels direct to the public for non-personal consumption (above 30Kg) and from unlicensed recreational fishers (anglers and netters) is believed to occur. The scale of the problem is difficult to quantify, but

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<sup>3</sup> <https://www.gov.uk/government/publications/pelagic-landing-obligation/pelagic-landing-obligation-guidance>

<sup>4</sup> <http://www.nsrac.org/wp-content/uploads/2014/12/1-1415-2014-12-08-Phasing-LO-for-Demersal-in-NS.docx>

<sup>5</sup> [www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2014/IBP%20Bass%202014/ibpBass\\_report\\_2014.pdf](http://www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2014/IBP%20Bass%202014/ibpBass_report_2014.pdf) - p.125:

“The official reported landings of sea bass in the UK are known to underestimate the true total landings, particularly for small-scale inshore fisheries where there has been no requirement to submit EC logbooks.”...“Despite the potential biases, the survey results for commercial vessels confirm that the historical official reported landings of sea bass are likely to be underestimates (Figure B1.1). For fixed/driftnets, the landings including the Cefas logbook estimates for under 10 m vessels results in a landings series that is on average around three times higher than the official statistics. For lines, the ratio fluctuates around 3.0 for a large part of the series but was larger from 2000–2005.”



numerous reports in the UK at least, suggest that these illegal practices pose a serious challenge for the accurate monitoring of bass catches. The NSAC is pleased to see the recent launch of a new campaign<sup>6</sup> from the UK Marine Management Organisation (MMO) to crackdown on such practices and encourages other member states to consider such initiatives to help monitor all bass catches. It will also be important for the wider public, restaurants and other commercial buyers to be made aware of the potential to be purchasing illegally caught and/or traded sea bass.

- 8.3 Improving the traceability of sea bass – from boat to plate - would help stamp out the unreported and illegal sale of sea bass and collect more accurate catch data. There is some evidence that carcass tagging schemes have been very successful at demonstrating provenance in some hand line fleets in the UK, France and the Netherlands. Given this success, it would be beneficial to promote carcass tagging more broadly in sea bass fisheries, especially considering the relatively low catch numbers of sea bass per vessel, and the fact that most sea bass are landed whole.
- 8.4 Better communication with the various sea bass catching sectors may encourage support for new management measures. It is imperative that all fisheries taking sea bass are provided with clear and accurate information regarding the state of the stock and the new regulations.
- 8.5 As the recreational component of the sea bass catch is estimated to be significant, Member States should develop schemes that would better monitor recreational sea bass catches. An assessment of different approaches should be undertaken, and in particular how the 10 fish per month bag limit will be monitored and enforced.
- 8.6 Supporting all of the above, there must be effective monitoring and enforcement of the new regulations. This is challenging for sea bass as it is caught in a wide range of areas (inshore and offshore), by a wide range of gears and vessel sizes, and by both recreational, commercial and unlicensed fishermen selling fish commercially whilst operating under the guise of recreational fishers. All catching components have a role to play and it is important that member states ensure adequate resources and powers are deployed to achieve compliance across all of them.

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<sup>6</sup> <https://www.gov.uk/government/news/looks-fishy-dont-risk-it-campaign-targets-illegal-sale-of-fish>



**Appendix 1**

Article 14 - Completion and submission of the fishing logbook - exemption: “only catches > 50kg/species”.

Article 16 - Fishing vessels not subject to fishing logbook requirements.

Article 21 - Completion and submission of the transshipment declaration – exemption: “only catches >50kg/species”.

Article 25 - Vessels not subject to landing declaration requirements.

Article 56 - Principles for the control of marketing – exemption: “own consumption < 30 kg”.

Article 59 - First sale of fisheries products – exemption: “own consumption < 30 kg”.

Article 65 - Exemptions from sales notes requirements – exemption: “own consumption’ < 30 kg + the 50 kg rule”.

