



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

Maes y Fynnon
Penrhosgarnedd
Bangor
LL57 2DW

Whelk Consultation
Fisheries Directorate
The Slieau Whallian
St Johns
Isle of Man
IM4 3AS

15 May 2017

By Email

Dear Sir / Madam,

Natural Resources Wales works to make sure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used, now and in the future.

Please find our response to your whelk consultation questions below:

Q1. Do you support the concept that the whelk fishery within the 3-12NM limit of the Isle of Man territorial sea should be a specific licenced fishery?

Yes

Why?

Natural Resources Wales supports the principle that the whelk fishery within the 3 – 12 NM area of Isle of Man territorial sea, an area adjacent to Welsh waters, should be a licensed or permitted fishery as part of a package of sustainable management measures. The licence or permit issued should include a range of adaptive conditions to control fishing effort and the spatial / temporal aspects of the fishery. If licenced or permitted fisheries conditions are informed by concurrent and relevant scientific stock assessment data this type of management mechanism, if applied flexibly, will grant the Regulator an ability to react to environmental change.

Q2. Do you support the proposal that the whelk fishery should cap the number of licences issued within the territorial sea between 0-3NM, 3-12 NM or both?

Yes, Both

Why?

Natural Resources Wales supports the proposal to cap the number of licences issued within both 0- 3 nm and 3 – 12 nm areas of the Isle of Man territorial sea. Currently the fishing effort on whelks within the 3 – 12 nm area surrounding the Isle of Man is not subject to any effort controls. With the price of whelks increasing and the fishery attracting new entrants this is a potentially unsustainable situation in terms of fishing pressure on whelks. By capping the number of licences, this on its own will act as a basic mechanism to limit fishing effort, but with technological creep and the ability to fish multiple fleets of pots from a single vessel there is still the possibility that there will be no defined ceiling on fishing effort.

Q3. Do you support a cap on whelk fishing effort within the Isle of Man territorial sea as a measure to protect stocks within the 3-12NM limit?

Yes

Why?

Natural Resources Wales supports the principle of capping whelk fishing effort within the 3 – 12 nm area of the Isle of Man territorial sea as a measure to protect stocks. Applying individual or combined fishing effort controls to vessels or the fleet of vessels targeting whelks will contribute to stock protection. However, it is important that the Regulator combines fishing effort controls with detailed environmental and stock assessment information from the 3 – 12 nm area to deliver sustainable management of the fishery.

Q4. Do you support the concept that specific whelk fishing licences for the territorial sea should be issued by reference period for the 0-3NM, 3-12NM nm or both?

This is a decision for fishery managers.

Q5 The Department's preference is 1st January 2016 – 31st December 2016; please select which reference period you prefer?

This is a decision for fishery managers.

Q6. Do you support a minimum number of days fished within the reference period, as above, as a means of determining eligibility for receipt of a whelk fishing licence for the 3-12NM limit and what do you think is a suitable number?

This is a decision for fishery managers.

Q7. Do you support the principle of a pot limit per vessel fishing for whelks in the territorial sea?

Yes, both areas.

Why?

Natural Resources Wales supports the principle of pot limits per individual fishing vessel or a total pot fishing limit across the fleet of permitted fishing vessels. As explained in our response to question 3, applying a pot limit as a measure to limit fishing effort will contribute to stock protection, however, it is important that the Regulator combines fishing effort controls with detailed environmental and stock assessment information from the 3 – 12 nm area to deliver sustainable management of the fishery.

Q8. If you supported the introduction of pot limits per vessel, how do you think the number of pots should be allocated?

This is a decision for fishery managers.

Q9. Based on your answer above, please can you give details of how you believe a suitable number of pots per vessel should be calculated? E.g. X pots per vessel metre/X pots per kilowatt.

This is a decision for fishery managers.

Q10. Do you support an increase in the minimum landing size of whelks caught in the Isle of Man territorial sea to 80mm?

Yes

Why

Natural Resources Wales supports an increase in the minimum landing size of whelks caught in the Isle of Man territorial sea from 70mm to 80mm. The science provided with the consultation indicates that 50% of the whelk population are not becoming sexually mature until at least 80mm. By increasing the minimum landing size to 80mm it will allow a significant proportion of the whelk population to breed at least once before capture contributing to the longer term sustainable of the fishery stock.

How should this be introduced?

This is a decision for fishery managers.

Q11. Do you support the introduction of seasonal spatial and temporal closed areas within the territorial sea to protect whelk resources on the seabed through co-management with industry stakeholders?

Yes

Natural Resources Wales supports the principle of introducing spatial and temporal controls within the Isle of Man territorial sea to protect whelk resources. These mechanisms should be available to managers in an adaptive format, as conditions to a

licence or permit, whereby managers can react, in consultation with the industry and at short notice if necessary, to specific environmental or fishery management issues.

Q12. Do you support harmonising existing management measures proposed in this consultation document with the existing measures already in place between the 0-3NM limit?

This is a decision for fishery managers, but harmonising management measures between those proposed in the 3 – 12 nm area with those that already exist in the 0 – 3 nm area would provide a consistent, equitable and transparent management regime.

If you need any further information on the detail included in our response please contact Colin Charman, NRW's Marine Fishery Advisor in the first instance on either colin.charman@cyfoethnaturiolcymru.gov.uk or 03000 654965.

Yours sincerely



Mary Lewis
Marine Advice Team Leader