

## **Institute of Fisheries Management (IFM) response to the Welsh Government (WG) consultation on the draft Welsh National Marine Plan (WNMP)**

29 March 2018

### **Background to the IFM**

The Institute of Fisheries Management (IFM) was founded in 1969 to represent professionals across all fisheries sectors and promote sustainable fisheries management within the British Isles and further afield. We have 10 regional branches in the UK and Ireland, including a Welsh branch. We also have various specialist sections including an Estuarine and Marine Specialist Section. We welcome the opportunity to respond to this consultation on the draft Welsh National Marine Plan (WNMP).

### **Overview comments**

The IFM welcomes the intent and vision of the broader marine planning process and recognises the contribution that it can make to the sustainable management, use and development of our marine environment. We also welcome the many detailed considerations given within the draft WNMP and acknowledge the difficulties in achieving a balance between environmental, economic and societal factors to achieve truly sustainable development. We wish to see the final WNMP being an effective and robust plan to guide the use of Wales' marine environment in the future.

We thoroughly endorse the vision set out in the Introduction to the draft WNMP, together with the Plan Objectives and the policies directing industries towards key areas of resource where benefits can be maximised. We also support the desire for blue growth and sustainable local growth. We fully support inclusion of the principles of Sustainable Management of Natural Resources as set out in the Environment (Wales) Act, 2016. In particular, we strongly endorse the concept of ecosystem resilience. The IFM wishes to maintain the sustainable management of fisheries and the resilience of this ecosystem, within the context of the WNMP, blue growth and the proposed Strategic Resource Areas (SRAs).

This requires further understanding of the current health of the stocks and populations of species around the Welsh coast and further afield, and the ability of these populations to withstand future uses of the marine environment as planned. Only when that is understood can the implications of planned activities be known and decisions be made using sound evidence and in a risk-based manner, whilst ensuring that decisions for economic or societal benefit are taken without causing long-term effects upon fisheries. The IFM would like to see this acknowledged within the plan.

### **Specific comments**

The IFM wishes to raise a number of further specific comments on the draft WNMP for consideration:

- The draft WNMP is split into a number of specific policies which aim to achieve the objectives of the WNMP, but the synergies and interactions between policies, including the spatial policies defined, is not clearly addressed, nor the processes for resolution of conflict between certain policies. There may be some value in including 'area-based' policies or commentary (such as for the Severn Estuary), as well as 'industry-based' policies, to deal with areas where multiple industries exist or there is intense usage.
- Dynamic and productive ecosystems in estuaries such as the Dee and Severn recognise no human derived boundaries. Sustainable management demands a fully integrated approach to secure these resources. We welcome the introduction of the marine planning process in the hope that it will create a more joined up, strategic approach to management of these areas and we stress the need

for this plan to dovetail with neighbouring English plans and existing legislation such as the Water Framework Directive (WFD).

- Under SOC\_08 Resilience to coastal change and flooding, we would point out that saltmarshes and managed realignments represent the optimal habitats for the early life stages of fish species such as sea bass. Where we have to create new sites, we can add significant value by building in multiple important ecosystem services, such as fish nurseries, carbon sequestration and nutrient stripping.
- We fully support the section describing the Marine Strategy and Good Ecological Status. However, we would point out that the existing regulation under the WFD apply in transitional and inshore coastal waters. We would encourage greater continuity of management across this boundary. Transitional waters act as important corridors for freshwater migratory fish as well as major nursery grounds for marine species such as sole and bass. The IFM's Position Statement on Sustainable Fisheries Management in Estuaries is provided in Appendix 1 for information.
- We welcome the statements made under SCI\_01 Risk based decision making. We should always attempt to make decisions based upon sound evidence. Where information is lacking, we agree that a combination of the precautionary principle, adaptive management, expert judgement and effective clear communication is appropriate.
- We welcome the policy stance taken in ENV\_03 Invasive non-native species. We would point out that there is some circumstantial evidence that the Chinese Mitten Crab *Eriocheir sinensis* has been vectored around the English coast unwittingly on commercial fishing vessels with damp trawl nets on deck. The animal can survive for many days in such conditions. User education is a key part of the effort to restrict the spread of non-native species.
- Under policy AQU\_01 Aquaculture (Supporting) we welcome the positive approach to planning for aquaculture adopted in the Draft Plan. We agree that the establishment of aquaculture, especially for shellfish can help drive better environmental management standards. Biosecurity and pollution control are key concerns however, particularly in view of the history of finfish farming in Scottish sea lochs and elsewhere in Europe. We support the view that Several Orders and Regulating Orders are the most appropriate tools to manage bottom culture shellfisheries sustainably. IFM members were active in assisting the establishment of the Dee Estuary Regulating Order for the cockle fishery and have extensive experience in this field.
- Key areas of resource under policy ELC\_01 support significant spawning and nursery grounds for marine fish species, and also migratory routes for a large proportion of Wales' diadromous fish populations. With policy ELC\_01 supporting all types of marine renewable energy generation around the Welsh coast within these areas of resource, the effects of projects being brought forward under this policy upon diadromous fish species and the spawning and nursery grounds of marine fish species needs to be clearly understood prior to decision-making. This will ensure fish stocks can be sustainably managed and to avoid conflict between policies.
- We welcome the progressive fisheries stance outlined with the promotion of local sustainable low impact fisheries operating to Maximum Sustainable Yield (MSY), employing the ecosystem approach to management. We note that policy FIS\_01 Fisheries (Supporting) makes no reference to recreational sea angling. Sea angling is recognised as a recreational pursuit, there is at least to some extent competition for and exploitation of the same resource as commercial fisheries. Bangor University and Cefas (2014)<sup>1</sup> estimated that the average total annual expenditure on sea angling in Wales by visiting anglers was an estimated £39.33 million. Furthermore the estimated average annual expenditure by sea anglers in Wales was £87.08 million. Although true comparison between these two sectors is more complex, the scale of this sea angling activity does suggest a potentially appreciable exploitation of the resource. It is very likely that recreational sea angling will continue to grow in importance in Wales in the future, both in economic and health and well-being terms. Many studies from around the world have demonstrated that the level of recreational pursuit of fish tends to go hand in hand with economic development. Consequently, the future sustainable fisheries management regime should include participation in the management process by both the

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<sup>1</sup> Bangor University and Cefas (2014) Socio-economic and Spatial Review of Recreational Sea Angling in Wales. Welsh Government report

commercial and recreational sectors. This would be a good example of the co-existence principle outlined in the Draft Plan.

- We note with satisfaction that FIS-03 Fisheries (Safeguarding) makes reference to protecting spawning and nursery areas. To date, existing information on spawning and nursery areas has not featured heavily in marine management in the UK. Sustainable fisheries management would demand that we pay much more attention to such factors in future, wherever the relevant information is available.

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**IFM Welsh Branch**

**Appendix 1.**

**IFM Position Statement – Sustainable Fisheries Management in Estuaries**

## INSTITUTE OF FISHERIES MANAGEMENT

### Position Statement

## **Sustainable Fisheries Management in Estuaries**

### **Introduction**

Estuaries provide some of the most productive and dynamic aquatic environments available. They act as important migration corridors, as well as spawning and nursery grounds for a broad range of freshwater, estuarine and marine fish species. Some species need to spend part of their life cycle in the estuary itself. Others need to migrate through the estuary in order to complete their lifecycles in freshwaters upstream. The intertidal margins of the estuary provide the most productive microhabitats in the whole estuary. A number of studies have now demonstrated that saltmarshes represent the optimal nursery grounds for the early life stages of species such as bass.

In the past, fisheries management in most estuaries has been somewhat fragmentary. Migratory fisheries have tended to be managed by the Environment Agency (EA and other equivalents) with little direct contact with marine fisheries interests and regulators, other than to protect migratory salmonids in specific locations. Clearer information, based largely upon new sampling regimes for the Water Framework Directive (WFD), provides an improved evidence base to inform managers. Given the new regulatory framework in the inshore area and defined responsibilities of regulators, the time is now right to properly review fisheries management in estuaries.

Under the Marine & Coastal Access Act, 2009, the new Inshore Fisheries and Conservation Authorities (IFCAs) have responsibility for regulation of all marine fisheries, including those in estuaries. The EA have been provided with new powers to maintain, improve and protect additional migratory species that utilise estuaries, smelt, river and sea lamprey.

Given its aim to promote sustainable fisheries management, now is a propitious time for the Institute to be using its considerable experience and unique skill base in this particular field to promote more sustainable management regimes in all estuaries. The socio-economic benefits to the wider community may well be profound.

### **General Position on sustainable fisheries management**

The IFM has established a number of general positions on sustainable estuarine and marine fisheries management:-

- The promotion of a healthy fish resource, available equally to all users, with maximal associated benefits for society and the economy
- Holistic integrated and inclusive management based upon the ecosystem approach and the precautionary principle
- Full inclusion of recreational sea angling in the management process
- Sustainable well regulated exploitation based on sound science

- Effective, robust, integrated enforcement following the principles established in the UK for Better Regulation
- Greater integration of fisheries and environmental policy
- Greater emphasis on stock and habitat protection and enhancement measures
- Greater emphasis on measures which tend to reduce discards and restrict unsustainable fishing and illegal landings
- Greater emphasis on the application of effort controls to marine fisheries management. These may include limitations on fishing methods and the temporary closure of fishing grounds to protect spawning and nursery grounds
- The promotion of branded, local, high value, low impact, commercial fisheries
- Greater recognition in management regimes of the high importance of intertidal areas as key nursery grounds for the early life stages of a range of economically significant species.

## **The Position in Estuaries**

- There are a number of estuaries in England and Wales, where informed inclusive dialogue over a number of years, based on good local environmental data, have resulted in management regimes which permit and indeed encourage sustainable exploitation in an inclusive and equitable manner. They all entail high compliance and low enforcement costs, without jeopardizing the broad range of vital ecosystem services which these environments provide. Good examples exist in the Thames, the Welsh Dee, and in a number of estuaries in Cornwall, Devon, the North West and the North East of England. IFM members have been actively involved in the partnership processes which have led to these successful examples. The IFM will actively work to support the continued success of these good practice examples and seek to promote their wider adoption elsewhere.
- The unique and productive environment that an estuary provides demands that some of are worthy of formal protection. However, the Adhoc Technical Expert Group on Marine and Coastal Protected Areas working for the Secretariat of the Convention on Biological Diversity note in their publication *Technical Advice on the Establishment of a National System of Marine and Coastal Protected Areas* that “the term ‘marine protected area’ (MPA) is taken not to include coastal areas or cross the land/sea interface, and omits important parts of the overall marine environment such as estuaries, marine saltmarsh (CBD Technical Series no. 13, 2004). IFM members have been very active in the designation of a number of estuaries as candidate Marine Conservation Zones, in part based on their status as important nursery grounds, utilising WFD data sets. The IFM will continue to promote broader protection of estuarine fish communities and habitats. The Institute believes in the multi-functional approach to MPA designation and use, where a holistic and inclusive view is taken of what is protected and what can still be exploited sustainably.
- A number of the good practice examples cited above include some temporal and/or spatial restriction on trawling in the inner parts of estuaries. The Institute believes that all forms of trawling can be extremely destructive to juvenile fish life and benthic productivity in the narrow confines of the inner parts of estuaries, as well as impacting on migratory species, albeit unintentionally. This makes no sense in terms

of sustainable fisheries management and tends to run counter to Good Ecological Status under WFD. The Institute will continue to promote the limitation of trawling in the inner sections of estuaries, based not on dogma, but on a case by case, consensual and inclusive approach and on the basis of good local science.

- Drifting gill nets set in estuaries legally for marine fish can have devastating impacts on migratory salmonids. Some of the good practice examples set out above already place controls on this method of fishing, to protect migratory salmonids. The Institute would support this good practice and would also point out that overall production of some targeted estuarine species taken by these methods such as bass and grey mullets, might actually be increased to the wider benefit of all commercial and recreational interests, if these destructive fishing methods were removed from the narrow confines of the inner estuary.
- The IFM provides technical support for the sampling of fish in estuaries to meet WFD standards through accredited training courses. The IFM is now supporting a number of new partnership fish survey programmes, building upon this technical support base. In our experience, management regimes that build upon the commitment and trust that naturally ensues from such collaborative survey programmes are much more robust, inclusive and ultimately successful.

IFM members have a wealth of experience in the ecology of fish in estuaries and in estuarine fisheries management. We look forward to more engagement in this field with you and many other interests in the future. Through a range of fora, we will continue to promote more sustainable fisheries management in all its forms in estuaries and other inshore waters.

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