



Isle of Man
Government

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Summary of responses to public consultation on proposed changes to Isle of Man legislation regarding sea bass (*Dicentrarchus labrax*)

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1. Introduction

The public consultation on proposed changes to Isle of Man legislation regarding sea bass (*Dicentrarchus labrax*) was launched 12th October 2015 with a deadline for responses of 23rd November 2015.

In accordance with the requirements of the Fisheries Management Agreement 2012, the following UK administrations were consulted on the proposals prior to launch of the public consultation and responded that they had no comments to make:

Department for Environment, Food and Rural Affairs (DEFRA)

Department of Agriculture and Rural Development, Northern Ireland (DARD)

Marine Scotland, Scottish Government

Welsh Government

Responses to the public consultation were sought directly from the following organisations:

Isle of Man Government Departments

Tynwald Members

Attorney General

Manx Fish Producers Organisation

Manx Anglers Forum

Bass Anglers' Sportfishing Society

Manx Wildlife Trust

Isle of Man Angling Federation

Douglas & District Angling Club

Peel Angling Club

Mannin Angling Club

Ramsey Angling Club

Manx Game Fishing Club

Isle of Man Fly Fishers

Members of the public and representatives of organisations not included in the list above were also invited to submit comments by 23rd November 2015.

Responses were subsequently received from the Department of Home Affairs (DHA), the Department of Infrastructure (DoI), and the following ten non-government organisations (NGOs):

The Angling Trust
Bass Anglers' Sportfishing Society
Institute of Fisheries Management
Isle of Man Angling Federation
Isle of Man Fly Fishers
Mannin Angling Club
Manx Fish Producers Organisation
Manx National Heritage
Manx Wildlife Trust
Peel Angling Club

Responses were also received from 82 individuals from the following areas:

Isle of Man:	23
UK:	48
Eire:	1
France:	1
Netherlands:	1
Not known	8

(probably UK)

2. Summary of responses

2.1 Government Departments

The DoI responded that it had no comment to make. The DHA responded that it had no concerns other than potential for extra burden on the police force, and expressed reassurance following further information being provided.

2.2 Non-Government Organisations

2.2.1 The Angling Trust

The Angling Trust is recognised by the UK Government as the representative body for all game, coarse and sea angling in England. It supported the suite of proposals, describing them as "visionary".

2.2.2 Bass Anglers' Sportfishing Society (BASS)

BASS, a UK organisation, whose membership includes Isle of Man residents, is affiliated to the Angling Trust. BASS supported Proposal 2 (recreational bag limit) on the proviso that Proposal 1 (ban on commercial fishing) is adopted. It also supported the other proposals, stating:

"In our opinion the proposed MLS / MCRS is set to ensure that a very high proportion of bass will have reproduced at least once and the upper landing size is commensurate with a fish of >5lb in weight and the point at which many anglers consider their catch to be a notable fish.

We also agree with the premise that returning larger more fecund bass will contribute to a robust gene pool and could provide a 'buffer' during recruitment fluctuations, which are known to occur within bass reproductive cycles."

2.2.3 Institute of Fisheries Management (IFM)

The IFM is a non-profit organisation created in the UK in 1969. Its international membership is drawn from professional fisheries managers, regulatory and research bodies, fishing and angling organisations, water companies, fish farms and private individuals. It is one of the Constituent Bodies of the Society for the Environment, which has a Royal Charter.

The IFM fully supported all of the proposals, stating "you present a fully reasoned argument, based upon good evidence, for the five proposals set out."

Regarding Proposal 1 (ban on commercial fishing), the IFM pointed out that, although it endorses "sustainable fisheries management which in many cases would include both recreational and commercial components...there are specific cases where the promotion of a fishery, which is entirely for recreational benefit and contains no commercial component at all, can make good sense in both stock conservation and economic terms."

Regarding Proposal 3 (minimum landing size), the IFM stated "We pressed for a 42cm MLS in our bass statement [*Position Statement-Sustainable Management of Sea Bass*, Jan 2015]. This seemed to be the best that could be achieved in the European debate during the winter of 2014/15. We would strongly endorse a higher limit of at least 45cm....Given your intent to commit to a recreational only fishery, we can fully support the reasoning for adopting an MLS of 50cm."

Regarding Proposal 4 (maximum landing size), the IFM stated "We would strongly endorse the application of this measure as a novel European experiment. One from which we might all learn something worthwhile."

The IFM also emphasised the importance of undertaking a long-term monitoring programme to "satisfy doubters and actively promote good practice."

2.2.4 Isle of Man Angling Federation (IoMAF)

The IoMAF fully supported proposals 1, 2 and 5. It also strongly endorsed the institution of a slot size, but expressed a preference for this to be 45-55cm rather than the proposed 50-60cm.

2.2.5 Isle of Man Fly Fishers (IoMFF)

The IoMFF fully supported the suite of proposals.

2.2.6 Mannin Angling Club

Mannin Angling Club fully supported the suite of proposals, stating its belief that "if a decent stock of bass could be maintained on the Ayres at the moment ,and hopefully around the whole of the Isle of Man, it would without doubt bring a good number of anglers from all over Europe."

2.2.7 Manx Fish Producers Organisation (MFPO)

The Chief Executive Officer of the MFPO stated that its "response to the consultation paper is the result of internal discussions within MFPO members and also following meetings with fishermen outside of this organisation and therefore represents the views of much of the Manx commercial sector."

The response was critical of the Department for proposing restrictions without first obtaining data specific to Manx waters, although it did acknowledge that "both areas of exploitation need to be restricted". While it stated that "there has not been a targeted commercial bass fishery in Manx waters for many years...", it expressed concern that the proposed ban on commercial fishing would have an adverse impact on small-scale fishermen, who catch bass "in small numbers....as part of a mixed fishery or on rod and line" as "one small part of their income which is forever being eroded by catch limits on other species". It proposed that small scale commercial fishermen be given a monthly catch limit determined via discussions with the relevant persons.

The MFPO also expressed concerns regarding potential impact of illegal selling of sea bass by recreational fishermen and the ability of the Department to enforce restrictions, claiming that non-compliance by recreational fishermen could counteract the potential benefit of further restrictions, and posed a greater risk to stocks than did the commercial fleet. It also queried whether the proposed bag limit might discourage rather than encourage non-resident anglers from visiting the Island. However, it did also state "There is no doubt that many of the sea anglers respect the fish they are catching and are an excellent advert for their sport. Visiting anglers would no doubt be of the same ilk."

The response was also critical of there being no proposals to protect spawning grounds or nursery areas.

2.2.8 Manx National Heritage (MNH)

MNH supported the proposals stating that they "seem to us to be sensible"

2.2.9 Manx Wildlife Trust (MWT)

MWT supported the proposals, stating "Changing its status to that of a sport fish, with protection measures commensurate with salmon and trout is commended..."

It also stated that it would also like restrictions to be introduced regarding what tackle anglers could use in order to minimise post-release mortality, and emphasised the importance of regularly reviewing the landing sizes to achieve maximum benefit.

2.2.10 Peel Angling Club

The club fully supported proposals 1, 2 and 5. It also strongly endorsed the institution of a slot size, but expressed a preference for this to be 45—55cm rather than the proposed 50-60cm. It also suggested a close season for anglers during the spawning season and queried how the regulations would be policed.

2.3 Individuals

2.3.1 Proposal 1 (Ban on commercial fishing)

19 out of the 23 responses received from Isle of Man residents expressed support for this proposal. Of the other 4 responses, which made no specific comment on this proposal, 3 stated that they considered bass to be widespread and plentiful in Manx waters because of the absence of a directed commercial fishery for the species.

All those individuals submitting responses from the UK and elsewhere (59 in total) supported the proposal.

2.3.2 Proposal 2 (recreational bag limit of 1 bass/day)

Of the 23 responses received from Isle of Man residents, 13 supported this proposal, 2 expressed a strong preference for a 2/day limit, 1 did not object to a 1/day limit but preferred it to be 2/day, and 1 preferred the UK limit to be imposed (3/day at the time the response was submitted). 5 objected to there being any bag limit.

With the exception of 1 respondent from the UK, who objected to any restrictions on recreational angling, all those submitting responses from the UK and elsewhere (58 in total) supported the proposal.

2.3.3 Proposals 3 (50cm minimum landing size) and 4 (60cm maximum landing size)

14 out of the 23 responses received from Isle of Man residents supported this proposed 'slot size'. 2 others supported there being a 'slot size' but preferred a different range (43-60cm in one case and, in the other, either 45-55cm or 43-50cm depending on whether total length or fork length). 6 supported retention of current legislation, and 1 stated that the Island should follow the UK limit (42cm) for the minimum size with no maximum limit.

With the exception of 1 respondent from the UK, who objected to any restrictions on recreational angling, all those submitting responses from the UK and elsewhere (58 in total) supported the proposed 'slot size'.

2.3.4 Proposal 5 (retained bass to be removed whole from foreshore)

Of the 23 responses received from Isle of Man residents, 16 supported this proposal and 2 made no specific comment on it. 5 objected to it, regarding current legislation to be sufficient.

With the exception of 1 respondent from the UK, who objected to any restrictions on

recreational angling, all those submitting responses from the UK and elsewhere (58 in total) supported this proposal.

2.3.5 Comments on related issues

2.3.5.1 Enforcement

Isle of Man residents:

- One expressed concern about the cost and feasibility of enforcement
- One suggested ban on fishing for bass between midnight and sunrise to cut down on illegal practice. "This would also remove uncertainty as to what constitutes a day."
- Two queried wording for proposal 5 concerned that it may provide a loophole for pleasure boat landings
- "However difficult it may prove to police these proposals, should NOT stop IOM Gov from pressing ahead and introducing them."
- "I think the sticky area will be the subject of policing ." "I believe it will need to consist of voluntary help when setting up and assisting with policing any new bye laws"

Residents of UK and elsewhere:

- "Although education and building willing compliance are essential there will also be a need for increased enforcement and more severe penalties. Perhaps by involving citizens within a 24/7 'Sea-watch' framework of reporting and responding in a timely manner to intelligence received."
- "Would the provision of measuring tapes in tackle shops for anglers (subsidised by advertising?) be helpful to enable non catch and release anglers to measure their catch whilst reminding them of the regulations?"
- "I hope perhaps that sea bass might be included in the 'Trout, sea trout, salmon license', so that there is the funds to continue this protection."

2.3.5.2 Potential additional restrictions

Isle of Man residents:

- One suggested closed season during spawning season and regulations on hooks to minimise post-release mortality.
- One requested restricting anglers to using one treble hook/lure with single hooks for the other two if using more than one hook when fishing for bass.

- One expressed a preference for anglers not to be allowed to catch and release following retention of a bass because of the inevitability of some post-release mortality occurring. "Proposal 4 & 5- Maximum landing size for Sea Bass of 60cm , I support both these in full however i personally would like to see some added wording along the lines of " No person shall take , kill or be in possession of any mutilated Sea bass" I see the possibility of fin trimming say a 61-62 cm Specimen."
- "The only additional aspect which comes to mind is how the proposed changes would apply to catches made from boats. It would be important to ensure that a simple loophole is not left should anyone choose to exploit any increase in bass stocks which may arise from the excellent proposals."

Residents of UK and elsewhere:

- One angler who had previously fished on the Isle of Man expressed a preference for anglers to be restricted to fishing bass on a catch and release only basis.
- One angler suggested banning live bait and extra protection for nursery and spawning areas.
- One angler suggested banning the eating of bass on the foreshore and the use of treble hooks.
- One angler suggested replacing 'landing' with 'retained' to avoid confusion.

2.3.5.3 Monitoring

Two Isle of Man residents emphasised importance of monitoring to assess impact of any new legislation, one of whom was keen for research to be conducted to ascertain the location of spawning areas of the Island's bass stocks.

2.3.5.4 Economic impact

Isle of Man residents:

One respondent believed that the proposals would put bass anglers off visiting the Isle of Man rather than attracting them. However, 6 respondents asserted that the proposals would have a positive effect on angling tourism:

- "If these proposals are passed I believe they would be hugely beneficial not only for Bass as a species but also the tourism industry."
- "it can only benefit the island with the increased number of anglers visiting to fish for Bass."

- "I have had several groups of friends over from various parts of the country this year, mainly fishing for bass, but they also like to fish for wrasse & pollack (callig). These guys spend a lot of money with the Steam Packet, self catering accommodation, supermarkets, takeaways, cafes, tackle shop, petrol/diesel, presents for the family etc. All the anglers that came this year, bar one are all returnees. Two guys have been back here fishing about ten times in three years. I already have two other groups of friends that are interested in coming over here fishing. One group from Ireland & a group from Wales that wish to come & fish for bass here next year."
- "I am particularly encouraged by the proposal of a maximum size limit of 60cms. Fish above this size truly are 'sportfish' and are the fish that would appeal to angling tourists, but more importantly than that, these fish are breeding machines and must be protected at all costs."
- "I believe if such proposals be passed [sportfishing] would become more attractive and boost our economy even more. I am involved directly with sport fishing/angling as I own a fishing lure manufacturing company on the Island specifically designing and manufacturing products for catching sea bass, if our sport fishery were to increase there would be the possibility of creating job opportunities within my company, thus another benefit to our economy."
- "We see many anglers visiting the IOM for angling purposes, and bass angling in particular is popular. In addition to the tourism attraction, the Island has at least 4 fishing tackle shops , as well as 2 online traders and local anglers spend significant sums on their chosen hobby."

Residents of UK and elsewhere:

One angler was opposed to any restrictions on recreational angling and stated "I would personally not visit the country or area with such a limit." However, 29 respondents asserted that the proposals would have a positive effect on angling tourism, including 8 anglers who had previously made fishing trips to the Isle of Man. (3 other anglers, who had fished on the Island made no specific comment on economic impact but did fully support the suite of proposals.):

- "If the proposal are successful I will be booking my next trip to Manx in support of the good work and I wont be alone !!"
- "I have a weeks bass fishing in Ireland every year. If these proposals go through on The Isle of Man, I would consider giving The Isle of Man a go for my bass fishing holiday."
- "when they are implemented I look forward to returning to the Isle of Man with my fishing tackle"
- "I live in Bristol, UK and I am a very keen bass angler and I visit Ireland and the Isle of Man for much of my bass fishing.... I spent just under 3 weeks in the Isle of Man this year. If your proposals become enacted then I would consider spending more time in the Isle of Man."

- "I am particularly impressed to see the proposal for a 50 - 60cm slot size. Over a few years this policy, if implemented, should allow the IoM to have a resident population of large Sea Bass that will make it a highly attractive bass fishing destination. This would strongly encourage me to make a first ever visit to the IoM."
- "I hope that this becomes law as it will only make it more likely that I will visit the Island for Leisure holidays in the future."
- "I spent [during Oct 2015 visit to IoM] approximately £350 which includes ferry travel and four nights staying at the Farm self catering apartment (excellent value). There were two of us, so a total of £700 for us would be a fair estimate, and of course this is during the off peak time of year. Catch wise, we caught four between us, up to 53cm, but we also fished for Callig and Wrasse which were more abundant. All fish were returned and a great time was had. This was my second visit, and I will be returning."
- "I regularly travel to fish, camping or staying B&B. The proposed changes would definitely make me think of adding the Isle of Man to my list of destinations."
- "As both a fish merchant and an angler I support these measures." "They will encourage further angling tourism trips as the IoM becomes a noted bass reserve as Eire has."
- "I am a full time recreational fishing writer and photographer, with a particular addiction to (sea) bass fishing.....although the one place I have not fished for them is in fact the Isle of Man." "if you guys do this right then I see no reason why you will not attract more and more visiting anglers."
- "Together with my fly fishing colleagues I travel far and wide in search of saltwater fly fishing opportunities in geographies where the stock of sportfish has a structure that reflects a natural position and significant numbers of larger fish persist. I have never been to the Isle of Man in my 50 years of fishing, however, should you achieve the proposed changes I am absolutely sure that I will be visiting together with my fishing friends as you are only a short ferry ride away from us."
- "...will paint the IoM in a favourable light generally and also highlight the island as a destination for bass anglers who traditionally venture over to Southern Ireland for the best bass angling."
- "I for one would happily support this by moving my holiday plans (always fishing based) to the IOM each year, rather than going elsewhere purely in the hunt for bass."
- "It would be fantastic if the Isle of Man were to adopt the proposals. I for one would certainly consider the Isle of Man as the destination for my next Sea Bass fishing holiday if it were to!"
- "The resultant benefits would add considerably to the economy as can be seen from the Striped Bass Fishery in the USA and help this iconic fish proliferate. Please do all you can to conserve and manage this important fishery."

- "The paper put forward makes note of the angling tourism of which I am a good example having spent a fair amount of money on food and accommodation while on the IoM. In fact in the course of a year I spend upwards of £3000 just on such travel costs in addition to many thousand I spend on my fishing equipment."
- "I've visited your Island on a couple of occasions to lure-fish in your seas. Whilst I enjoy catching most fish, the quality of the Bass fishing is in my opinion the jewel in your crown. I just hope that these proposals are implemented as soon as possible to protect such a valuable resource."
- "I hope to spend a holiday in the IOM in the near future, not just because your attempting to protect bass in this way, but these proposals will hopefully add to the stock in your area and the chance of catching more and bigger bass."
- "they are the right set of legislation changes to ensure the future of bass around the Isle of Man and promote and sustain the valuable tourism and recreational aspects of fishing for bass with rod and line...."
- "My friends and I invest significant sums each year visiting destinations that offer fine shore fishing, a refuge for wildlife and a welcoming approach to visitors. I hope that the proposals are adopted and I look forward to visiting with my angling friends and contributing our bit to the Isle of Man economy."
- "If the proposals you are recommending were to be implemented in full I am sure the Isle of Man would also benefit from an increase in angling tourism related to bass fishing."
- "The IOM tourist industry will also benefit from a healthy number of bass for the visiting sportsfishermen/women."
- "I would just like to say as a regular Angling visitor to the Island how excited I am by these proposals and hope fervently that they come into force." "What's more Anglers spend an enormous amount of money just IN THE HOPE of catching one."
- "My first visit three years ago was purely in pursuit of the bass. I have returned to the island several times and am now planning a trip next year with my family as our main family holiday so you can see how the economy would benefit from increased numbers of anglers supporting the island."
- "As a frequent visitor to the Isle of Man to fish for Bass, I completely agree with the proposals that have been made with regard to Bass conservation."
- "I am certain that if such measures come in to force I (and many like minded bass anglers) will be adding The IOM to the list of must visit destinations for bass fishing."
- "I am certain that they will benefit the Isle of Man bass fishery in particular and the economy in general."
- "a great attraction for someone like myself to visit for a holiday."

- "I am in love with your project that I have translated thoroughly in order to diffuse it in France" "I definitely shall come in your Island and observe the results of your experience as I did in Ireland.... I can tell you that many french anglers....come regularly in Ireland for sea bass fishing, especially the big ones."

The information in this booklet can be provided in large print or audio format upon request.