

## The Jersey Recreational Fishing Group



### The Bag Limit Proposal: Response to the Scrutiny Panel

Many recreational fishermen are not associated with clubs and organisations. Due to omissions and misleading information it has been difficult for many to develop an informed view on the bag limit proposal. We have just formed The Jersey Recreational Fishing Group to ensure recreational fishermen as a whole are better informed on such matters and to effectively give them a collective voice. The purpose of this submission is to present their views to the scrutiny panel.

The comments and analysis document which has been attached to this submission cover the issues in more detail. This document offers some reasoning and justification for our views but is primarily intended for the purpose of highlighting the issues to the Scrutiny Panel. We have tried to be as comprehensive as possible in explaining the issues however this is a complex matter which has required the input of many. In many cases, is not possible to obtain facts to back up points made.

The Jersey Recreational Fishing Group's General Views are presented as a list of points which are intended to stand alone as a single document. This document was designed to offer fishermen a simple mean of supporting the views if they wish. These General Views consolidate the opinions of most major recreational clubs and organisations which should greatly simplify matters. The parties and organisations who have contributed toward this group as listed on our General Views sheet. All parties mentioned will be available separately for comment if required and some may be submitting their own comments to make additional points.

We are not claiming every recreational fisherman in Jersey subscribes to these views and we clearly do not have time remaining to canvass every fisherman in jersey; we would therefore appreciate it if fishermen responding to scrutiny could be made aware of the recent formation of our group given an opportunity to comment on our views.

We would have ideally spent more time on preparing this submission but feel it is far more important that Scrutiny be made aware of potential issues now in order that they can ask the right questions.

The Jersey Recreational Fishing Group

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04 June 09 Draft

## **The Jersey Recreational Fishing Group**

Jersey Recreational Fishing Group is an informal group set up to represent the collective views of recreational fishermen. The group includes low water fishermen, divers, anglers and spearfishermen. Some members of this group are club officials representing the views of their members. The group has support from representatives of all major fishing clubs and organisations including the rod caught records committee, Sinkers Sea fishing club, Club Apnea, the Jersey Specimen Hunters group, the Jersey Spearfishing Club, the Jersey Bass Festival Committee and the organisers of the Jersey Shore Angling Festival.

### **The Group's General Views:**

- We are not against recreational bag limits that are justified for protection of fish stocks or bag limits intended to improve stocks and promote tourism and leisure fishing. Such limits would be pointless unless accompanied by heavy restrictions on the commercial fishing methods which target the same fish.
- A bass bag limit would only restrict fishing methods such as beach netting and boat fishing that regularly result in catches in excess of five bass. It puts out the wrong political message to pointlessly impose similar restrictions on lower impact and sustainable fishing methods that we are actively trying to promote for the benefit of locals and visitors.
- We would support a significant increase in the minimum legal fish size to allow fish to breed. This would be far more beneficial to fish stocks than a combination of recreational bag limits and commercial concessions.
- We do not believe an ormer bag limit will make any significant difference to current stocks as 90% of them are below the low water mark and inaccessible.
- The impact of recreational fishermen on the Island's overall lobster stocks is questionable. The proposed restrictions on low water fishing for lobsters will achieve absolutely nothing and will again pointlessly penalise a sustainable method.
- We strongly object to any proposals that will penalise thousands of us that have done absolutely nothing wrong purely to help a tiny minority with financial interests.
- We object to restrictions that have nothing to do with fish stocks and deny us a source of food purely to benefit those who sell the same commodity.
- We object to a flawed political process which allows unfounded and biased proposals to be pushed through the states as a worthy cause.

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## **The Jersey Recreational Fishing Group**



Draft Submission  
04 June 09

### **The Bag Limit Proposal: Comments and analysis**

We accept that we are not in possession of every fact on the matter and we may not be 100% correct on every fact we do have. It is acceptable in a legal document to make unfounded accusations and assumptions based on no credible evidence, then it is certainly acceptable for us to counter these with claims that we believe are correct but can't easily be backed up with evidence. If only a fraction of our claims have some substance, this is more than enough to expose this proposal.

The bag limit proposal was first championed by Philip Ozouf several years ago. At the time, hundreds of amateur fishermen officially met to discuss the implications. Many voiced opposition, not to the concept of bag of limits but to the principle on which the proposal was based. Following the meeting a recreational group was set up to respond to the proposal.

The current Jersey Recreational Fishing Group includes representation from the original group. We were repeatedly told by the parties pursuing the proposal that objecting was pointless as bag limits were a forgone conclusion because they have ministerial approval and UK approval this view is still openly maintained by those parties. All attempts to bypass the panel we were blocked and we were told that any comments we have must be put to this panel for consideration.

We were forced into a corner; we could either object and achieve nothing or support bag limits on the basis that commercial fishermen also accept some form of restriction on their activities. Restricting netting in the bays and close to the shoreline was discussed.

We accept that we failed to offer a representative to sit on the panel for a period following this. It is understandably very difficult to fill a seat which is automatically overruled by commercial interests and your only hope is to grovel to them for concessions.

Our position had however, already been made clear to the panel. Only now have we realised that the proposal has gone ahead without being linked to any form of commercial restriction. Had we realised at the time that we had been misled and bag limits were not a foregone conclusion, we would have objected to the proposal without it being linked to major concessions from the commercial side.

Recent public statements made by those backing the proposal have been taken directly from the wording of the Draft Regulations document. Most members of the public and clearly all politicians have assumed the statements must be true as they are based on a legal document. At face value, most would be inclined to support the proposal.

Even with little positive information to support an argument, it is not difficult for an expert to put a case together if few others know enough about the subject to question them. It also helps if they are the official authority on the subject and can't easily be challenged. Critical points which strongly suggest certain situations are actually the total opposite have been omitted. The Group's analysis of the Draft Proposals document highlights these inconsistencies. It is a separate document but forms part of this submission.

The fact that the Secretary has already made amendments to the first bag limit draft is an indication of inconsistencies. Human rights matters are still questionable. It must surely be an infringement of rights to deny thousands a source of food for their families purely to benefit a handful with commercial interests. Are we all banned from growing more than five potato plants each year in our gardens just because a few "unscrupulous individuals" are selling them and undermining the sales of commercial growers?

We would however; not have an issue if fish stocks were improved by heavy restrictions applied to commercial fishermen as well. The resulting increase would guarantee more regular catches. If those of us who fish primarily to feed friends and families knew we could catch five bass every time we went fishing, we would feel less need to keep ten bass when we have a lucky day to compensate for all the trips when we catch nothing.

The group accepts that current licensing law prohibiting the sale of fish caught by unlicensed boats is being broken. It must be extremely frustrating for Sea Fisheries that the law is totally unenforceable. However, this whole issue must be put in perspective; Bag limits do not protect the public from injury or violence; they purely protect the financial interests of a very small number of individuals.

As there is no evidence to suggest the problem is extensive, it is questionable that the restrictions be of significant benefit to anyone apart from those who are paid to police it. Is this proposal is just a way of giving Fisheries the powers they have always wanted? We have no problem with fisheries imposing more restrictions on us, providing they are for fair and justified reasons. We are also given the impression by those with a vested interest in policing powers that fish are some sacred commodity that must subject to tighter control and regulation than drugs or alcohol.

Scrutiny may have their hands full with this. It appears to be generally accepted in the states that the information gained by the departmental experts in a one-day study automatically overrules any statements from those that have collectively spent many thousands of hours observing the same factors. How often have we been told by a department that that; "the findings of our study do not support your view".

The proposal has been formulated by politicians and experts paid to try and justify the proposal not question it. The involvement of the Fisheries Advisory panel greatly complicates matters as the proposal involves the personal opinion of those with vested commercial interests.

Considering this is a legal document, it is unbelievable that most points made in support of the proposal are flawed. Instead of questioning some of the unsubstantiated claims and manipulated information, States members supported it! If this proposal can make it most of the way through the states, how many other unfounded, unfair and

unenforceable regulations have been approved in the same way? This is a matter of serious public interest.

The latest JEP article claims a maximum penalty of £20 000 is proposed for breaking the bag limit law. This standard tactics; when they finally agree to reduce it to £5000 we will all be so grateful to them for being more reasonable and listening to us...Wrong!

We were not aware that the scrutiny panel was in a position to asses this proposal. We consequently took other measures to raise the profile of the issue. The recent JEP news feature which questioned the bag limit proposal was based on our correspondence. The article successfully put some points across but could accommodate many other important points.

It is a sad reflection on local politics that we must set up an organisation such as this to protect ourselves from blatantly unjust restrictions being proposed by the government. For this group, the next stage involves writing to the Secretary Of State, local states members and the media. If necessary, petitions will follow. We do not wish to waste anyone's time, especially ours. We are therefore prepared to await a response from the scrutiny panel before proceeding with any such action.

## **Analysis of the Draft Proposal Document**

The group offers the following comments on the Draft Sea Fisheries (bag limits) (Jersey) 200- regulations:

*"The benefit of Regulations setting restrictions on the number of fish or shellfish that may be caught by recreational fishermen – "bag limits" – has long been recognised, both locally and elsewhere."*

This fails to mention that restrictions are only considered beneficial for the purpose of stock conservation and elsewhere such restrictions always go in hand with heavy commercial restrictions. There therefore is no comparison between the proposed bag limit and cases elsewhere.

*"Local recreational scallop divers have been restricted in the number of scallops they may take, since such activity became legal over 10 years ago."*

Those with a recreational scallop license are restricted, however the limit applies to how many scallops they can land, not how many they can possess once on land.

On each day, the proposed bag limit law prohibits possession of any fresh fish in excess of the limit at any time whether in a boat or on the shore ....or not even fishing.

The scallop license system is purely in place to manage and maintain the scallop fishery. The bag limit proposal has nothing to do with fisheries management.

If there are clearly no similarities whatsoever between the two systems, why are scallop restrictions used in support of the argument?

*"In Brittany and Normandy, low water fishermen have been restricted in the number of oysters they may take for many years. Whilst it is recognised that limiting the number of oysters caught is a conservation measure to protect stocks which are still recovering after a disease...."*

The local ormer stock situation can not be directly compared with France or any other location. Tidal ranges and seabed topography govern the percentage of ormer stocks are accessible at low water in any given area. Along some stretches of French coastline all the ormer stocks will be accessible at low water and bag limits will make a difference. Along others, bag limits are pointless as none are accessible.

We have a mixture of these situations condensed into one area. As a whole we have an extensive ormer population below the low water mark which is hundreds of times larger than the accessible stocks. In most areas, this submerged zone adjoins the accessible ormer ground. In such areas, accessible stocks are replenished as ormers move a short distance, often only a few metres, into the intertidal zone.

Recent strict regulations on taking ormers only raised their status resulting in an increase in fishing effort on the days when ormering is allowed. This has also increased their value, increasing the incentive to either ignore the regulations or exploit loopholes.

In recent years, it has been almost impossible to catch 20 ormers on a regular basis while low water fishing. Even before the disease, 20 was considered a respectable catch. Ormers are not a commercial species and the vast majority of stocks around our coast are naturally inaccessible. How will a bag limit therefore achieve anything significant, especially one that is very difficult to exceed anyway?

Fisheries must be perfectly aware that restricting ormer catches to 20 a day will make no difference whatsoever to the overall stock numbers. Even a limit of 5 would make no significant difference. Ormers should not be in the bag limit proposal. It appears their presence is purely intended to minimise objections by sounding generous.

*".....Limiting numbers of lobster and bass targets the illegal sale of fish and shellfish by non-licensed fishermen.*

*The fishing industry has called on the Department to introduce legislation which would effectively prevent the sale of "black" fish which results in a reduction in the market price.*

If just one commercial boat has a good day and lands hundreds of bass, this can affect the high end of the market. There is therefore no dispute that there are occasions when recreational catches affect commercial fishermen however there is no evidence to suggest this is a regular or widespread problem. Some catches are perfectly legal to sell if caught from the shore. Whether or not such sales appear on income tax returns is a totally separate issue.

There has recently been an increase in the importation of farmed bass and other fish. Many supermarkets import their fish and bypass the local system. This has a major impact on the local market. Some fishermen will undoubtedly struggle as long as people continue to buy these fish. This is a conflict which is very difficult to resolve.

Recreational fishermen may be an insignificant factor compared to this but, there is no one else to target, so we have now jumped to the top of the list. There are numerous means of assisting small-scale commercial fishermen which do not infringe upon the rights of others. Some of these have already been successfully implemented with assistance from the states.

It is known that less than a dozen commercial fishermen specialise in bass fishing and land significant catches of bass on a daily basis. These fishermen have complained to their association that their sales are being impacted by recreational catches. The

commercial Fishermans Association only represents a minority of local licensed fishermen. Many are not members of the association and do not support their views.

A number of licensed fishermen are associated with of this group. This may sound like a contradiction however; they do not agree with the bag limit proposal and feel they have no other way of putting their views forward. Most of recreational fishermen and many other members of the public already have negative opinions of commercial fishermen. Many are small scale commercial fishermen who would benefit from more states help. This is unlikely to be forthcoming without public support for their cause. They consider it to be political suicide to peruse a proposal which offers questionable benefit and a major loss in public support.

The bag limit issue is actually far simpler to resolve than we are led to believe as the problem is obviously selling activity not catching fish. There are numerous measures which could be imposed at the sales end which would prevent illegal sales. For an example; tagging systems are known to work elsewhere with license holders being issued with numbered tags. Similarly; how difficult would it be to pass a regulation that requires those who purchasers fish on a commercial scale to retain proper receipts which must include the fish merchant or fishing license number? The deterrent value of carrying out occasional checks of any fresh bass on the premises would be high and would take up far less resources than checking the catches of thousands of fishermen.

The fact that these proven solutions have been dropped in favour of bag limits strongly suggests there is a hidden agenda; every fish retained by a recreational fisherman is one less that can be caught by a commercial fisherman. Every fish we give to friends and family is one less they will buy.

*"The Sea Fisheries and Marine Resources Advisory Panel, which has on it leading members from commercial fishing, leisure fishing, angling and fish farming, is unanimous in its support of this measure."*

Few fully understand the complex issues surrounding this proposal. It is highly likely the states have relied totally on the advice of Sea Fisheries and the Advisory Panel. The panel has representatives from all backgrounds. However, a closer look at the makeup of the panel and the allocation of votes will soon explain why the panel supports recreational restrictions.

We are told that our Advisory Panel system is perfectly acceptable because various UK authorities use the same system. Further investigation will show that they also have the same issue with vested commercial interests leading to unreasonable proposals.

*"Jersey's fish populations may be exploited by 2 main groups of people: the professional fishermen who have purchased a fishing license and the amateur or leisure fishermen. Leisure fishermen are not permitted to sell their catch caught in local waters from a vessel that does not have a fishing licence; however, because certain species attract a high value if sold (in particular lobster and bass), some unscrupulous individuals that do not have a fishing licence for their vessel are tempted to catch more than they need for themselves and sell the surplus catch."*

Many commercial fishermen hold original licenses which were issued for free. Only those who obtained a license from someone else will have paid for it.

*"At present, professional fishermen have either a shellfish qualified licence which allows them unlimited catches of shellfish, or are only allowed to fish for 15 lobsters and 25*

*crabs per day. No such restriction exists for leisure fishermen, and this legislation would rectify the disparity. The bag limits in the proposed legislation make generous allowance for leisure fishermen fishing for their own consumption.”*

A commercial fisherman without a shellfish entitlement on his license can only ever be a “wet fish” fisherman (bass etc), a dredger or scallop diver. He can never fish commercially for crab or lobster. How will he therefore benefit from a recreational bag limit on crab and lobster? This disparity is totally irrelevant and does not support the argument.

Due to the sheer effort required to catch commercial quantities of crab or lobster, only full time fishermen or those with larger boats can catch saleable amounts. There is therefore little issue with recreational lobster catches impacting the market. No disparity exists regarding bass as there are no commercial restrictions on the species that apply close to our coastline.

*“This legislation serves to limit retention of the named species of fish and shellfish by non-licensed fishermen to a reasonable amount; 20 ormers per person per day, 5 bass per person per day and 5 lobsters per person or boat per day (whilst an individual fisherman may retain up to 5 lobsters, 3 fishermen on one boat would be restricted to a total of 5 lobsters).”*

The proposed bag limit figures do not make any sense. It is extremely difficult to catch five lobsters or twenty ormers while low water fishing and five bass is an exceptional catch for a shore angler. Even the most skilled spearfisherman will struggle to catch this many in a day. It is only possible to regularly land catches that exceed the proposed bass limit while fishing from a boat or beach netting.

Shore fishermen make up the vast majority of recreational fishermen. A number say they are not concerned by the proposed bag limits because they doubt they could ever catch that many bass, lobsters or ormers anyway. This is exactly how they were supposed to react as the bag limit figures were designed to limit objections from the vast majority.

Few recreational fishermen are aware that the proposal is actually an enabling law to allow bag limits of any number to be imposed on any species as seen fit by the authorities. Once passed, limits can instantly be lowered and more species added without referral to the States. Few are aware of this because the draft proposal document does not mention this and the parties backing the proposal have somehow failed to mention this critical point. Recreational fishermen who are aware of this have a much stronger view on the subject.

If the proposed law is passed purely to protect commercial interests, this will set a precedent which effectively gives commercial fishermen control over setting recreational restrictions and imposing new fisheries regulations.

*“Although the majority of recreational fishermen would support the introduction of bag limits, some objections may be raised to this legislation by those who see the measure as a denial of a source of income.”*

Recreational fishermen would support bag limits but only for stock protection or improvement and these would need to go in hand with heavy commercial restrictions. Recreational fishermen strongly oppose this bag limit proposal because it has nothing to do with fish stocks, not because they sell fish.



This wording has been composed to effectively accuse any who wishes to catch more than five bass of doing so because they intend to sell them. Such accusations play no part in a draft legal document.

*“Fishermen catching bass from the shore using rod and line, set nets and longlines may currently sell an unlimited number of bass as there is no requirement for them to hold a fishing licence. Whilst some such individuals may see a reduction in income derived from this source, the Regulations allow the Minister to exempt some fishermen who can demonstrate a genuine record of commercial activity (a separate Ministerial Decision will be taken in relation to any such exemptions).”*

It is not possible to catch large numbers of bass on a regular basis using any shore-based method. However some shore fishermen do occasionally land catches of potential saleable value, primarily through set-netting along the east coast. In reality, only a small number of individuals set nets. Most fish for their own consumption or to feed friends and family. There are objections from these fishermen that the proposals will deny them a source of food not money.

Even for those who can produce receipts for fish, how will it be possible to prove they caught them using any particular method? A proportion of those that set nets and longlines from the shore are commercial fishermen with licenses. They will obviously be allowed to continue this practice unrestricted.

There are very strong environmental arguments against netting close the shoreline and on the beach. These are not mentioned in support of the proposals as the proposals have nothing to do with environmental protection. Most recreational fishermen would support shore netting restrictions proposed for environmental or stock protection reasons. Such restrictions would clearly be pointless unless they also applied to commercial fishermen.

*“It is likely, however, that the principal objectors will be those anglers working from unlicensed fishing boats who will no longer be able to sell significant quantities of bass, and indeed it is the aim of this legislation to deny them that illegal income.”*

This comment firstly makes the totally unfounded claim that significant quantities of fish are sold illegally. A minority fish purely for sport and return most fish. Most recreational fishermen fish for sport but also to provide food for family and friends. Many boat fishermen can only fish weekends subject to the weather. It is not unreasonable of them to try and catch enough fish to supply the family and friends until the next time they can get out and also to fill the freezer for the winter. Five bass every few weeks will not go far. Is the proposal also intended to force these fishermen to put back their fish and buy them from a commercial fisherman instead? These fishermen will be objectors but the principal objectors are most recreational fishermen.

*“The existence of bag limits for bass would contribute to the increase in angling tourism as it would underline the importance to the Island of efficient management of the fishery.”*

It is beyond belief that a blatantly incorrect claim can form part of draft legal proposal. How can restricting recreational bass catches be seen as efficient fishery management when the commercial fishermen that these measures are designed to benefit will still have a free reign to take as many bass as they can catch.

The proposal has certainly attracted national attention from bass fishermen. However, they are not queuing up to book a fishing holiday; they are expressing their anger and offering us their sympathy and support. Fishermen have very strong views on commercial exploitation. The political fallout from failing to tackle the commercial targeting of breeding bass stocks in Guernsey has had a negative impact on their fishing tourism.

We are not in such a dramatic situation however the same political principles apply. Try justifying to a visiting fisherman that he must put a fish back to support "efficient management of the fishery", while at the same time 200 metres of gill net is being paid out in front of him.

Several local clubs regularly hold national and international competitions. Visiting fishermen commonly stay for a week or two to make a holiday out of it. Due to strong political feelings over the issue we have already had negative enquiries.

Recreational Bag limits are successfully in force elsewhere. In all these cases, commercial fishing is also heavily restricted. If local bag limits were necessary for protection of fish stocks or the environment, high impact commercial fishing practices would obviously be addressed as a higher priority. In some situations, not dissimilar from ours, commercial bass fishing is banned altogether as the authorities have realised that there is far more economic benefit in encouraging tourist sport fishing than supporting a small number of commercial fishermen. The group is not suggesting this should necessarily be the case locally; the example is intended to demonstrate just how far off the mark bag limit proposal actually is.

It appears no thought whatsoever has been given to the economic implications of the proposal. Many recreational boat fishermen can only fish occasionally. Those who know these fishermen will know the disproportionate amount of money many will spend in an attempt to maximise their chances. Some fish primarily for sport and some fish primarily to bring home a good catch for the table and the freezer. If these fishermen can no longer keep a good catch, what is the point in them spending the money? The restrictions will potentially impact local fishing and boating-related businesses. Some of these businesses have expressed their concerns to the group. It is ironic that it is Economic Development that is backing these proposals. It would be interesting to see how this point was evaluated in their economic assessment of the proposal. Under a normal bag limit proposal aimed at stock improvement, this would be offset by an increase in visiting fishermen buying equipment.

*"The legislation denies no-one the right to fish. Fish caught in excess of the bag limit can be put back into the sea"*

Most bass caught rod angling are unharmed and will survive if returned. There are exceptions such as a small fish gut hooked with a large hook. It has been demonstrated that such fish will not survive. There are hook designs that minimise the chances of this happening. Any bag limit proposal must consider points such as this.

Some fish caught in regularly checked nets or on lines will be in a fit condition to survive if returned. However, netters often only check their nets once a day. Often they are left overnight. Many fish that have been in a submerged net for many hours will either be dead or unfit to return. All fish that have been in a beach net or a long line that has dried out will be dead.

This proposal clearly has a secondary agenda to restrict certain fishing methods such as beach netting. It is a misguided belief that bag limits will make this happen as those who employ such non-sporting methods will certainly have no moral issue with discarding dead fish. Many recreational netters would still consider it worthwhile fishing if they can keep the five biggest bass. Many would actually consider themselves lucky to even catch five bass. It is also total fantasy to believe that every rod angler has high morals and would keep five small bass if they subsequently caught five much larger ones. This is why unfairly imposed bag limits that are opposed by fishermen will not work.

*“if fishermen wish to sell their catch and legalise their activity, licences are available for them to buy.”*

Licenses are hard to find and expensive but can be bought. If recreational fishermen who had no previous interest in selling fish have to buy a license just to allow them to catch over five bass, some will undoubtedly try and recoup the cost. This will result in more fishermen trying harder to catch more fish then selling them perfectly legally. Any who previously sold fish illegally will certainly be determined to recover the cost. This will make selling fish harder to the detriment of current commercial fishermen. This is totally contrary to what this bag limit proposal was intended to achieve and it would also be totally contrary to bag limits imposed for stock protection. This fact that this point is used in support of the argument demonstrates that those behind these proposals do not have a clue what they are doing. The last thing anyone needs is more commercial fishermen!

*“Financial / Manpower implications*

*There are no additional financial or manpower implications for the States arising from the adoption of these draft regulations.”*

Adopting regulations does not require resources. Proper policing and enforcement does. Many current fisheries laws are openly broken as it is common knowledge that the Department does not have the resources to carry out regular patrols and inspections. Fisheries will obviously not have figures on this.

Every bag limit system inherently comes with numerous legal loopholes and illegal means of avoidance which are virtually impossible to counter. It is obviously not appropriate to list these. In order to be effective, such regulations therefore rely heavily on the on the support of fishermen.

Fisheries seem oblivious to the political implications of perusing these unfair restrictions. Many fishermen who would previously have been happy to cooperate with them have now changed their views.

It appears standard practice to mislead the states on manpower implications. You can't loose out proposing new regulations as even if you can't enforce them you end up with more power and political respect in the states. You can then request more resources to police regulations that are being broken on a widespread basis.

**The Jersey Recreational Fishing Association**  
Response to JEP letter dated 13 June from Don Thompson

Don Thompson, Chairman of the Jersey (commercial) Fishermans Association recently commented in support of the bag limit proposal. The Jersey Recreational Fishing Association had no intention of dragging up points that blacklist commercial fishermen or their association just for the sake of it. It ironic that, in attempting to counter our arguments, Mr Thompson has now publicly raised these issues himself.

Mr Thompson uses the issue of income tax and illegal sales to support his argument. Many high-end fish sales are "cash in hand" whether legal or illegal. Is this not why very simple "buying/selling" regulations have been dismissed by commercial fishermen in favour of bag limits? Such measures clearly tackle the root of the problem and would be easy to enforce but apparently they involve too many complications (keeping sales records that could be accessed by income tax?).

The local bass fishermen operating close-in around our coastline are not subject to any catch restrictions whatsoever. Will Mr Thompson please stop claiming that it is not fair to have unrestricted recreational catches while commercial catches are restricted? Recreational fishermen are not the only ones on the hit list. The commercial Association have even proposed restricting the majority of commercial license holders who do not fish as a full time living for the benefit the minority of their members who do.

So we are wrong in claiming this is purely an economic measure? Not according to the Draft Sea Fisheries (bag limits) (Jersey) 200 document. We question if Mr Thompson has actually seen the document. The proposals document itself makes many incorrect and ridiculous statements. Who honestly believes that bag limits will not require an increase in manpower or resources to enforce? The "Draft Sea Fisheries (bag limits) (Jersey) 200- regulations" is on the Jersey Legal information Board's website under: "*laws--- draft legislation*". We have submitted a full analysis of this document as it raises many serious issues of public interest. It is pointless continuing to counter all the claims Mr Thompson makes as we have already done this in our analysis.

We agree that we must have a comprehensive plan of action in place ready to deal with any future decline in bass stocks. We will discuss this with Mr Thompson once he stops insulting our intelligence with this current proposal.

It is not difficult to put together a common sense proposal that does not penalise anyone unnecessarily;

Base the proposal on stock conservation; Target the higher impact recreational boat fishing methods before the sustainable shore-based methods; State the proportionate commercial restrictions that will also be imposed; State that restrictions will be implemented at the first sign of a serious problem with fish stocks; and this might just start to sound like something we can support. Are we really being so unreasonable in requesting this?

An increase in the minimum bass size that allows fish to breed before being taken is actually a far better conservation measure but is unlikely to be supported by the commercial sector as most high-end fish purchasers want fish that are just on the current legal size and no bigger.