

Comments from the Jersey Recreational Fishing Association (V2)

A history of stock collapses, environmental damage & widespread conflicts prove that managing our marine environment based on opinion doesn't work. The MSP is a significant achievement. A huge amount of work has gone into collating information to ensure future management decisions can be based on science not bias. However the process is already being undermined by the same old bias & opinion.

Maerl beds are home to a huge variety of species & are nursery ground for many more, including commercial species. We have an international obligation to protect maerl as a habitat. The Ecosystem service assessment states "Jersey is committing to maintaining its maerl habitats in a favourable condition as a signatory to OSPAR". The MSP identified areas where some maerl is known to be present & earmarked them for protection from dredging until the full extent of the maerl can be established. If maerl is present this is a strong indication that the conditions are right for it to thrive, if given the chance.

Following "extensive consultation with the commercial sector" the Minister has decided to allow dredging to continue in these areas. This is like trying to assess how many protected species are in a field while it's being ploughed. There was no extensive consultation with other stakeholder groups on this matter which undermines the whole process.

We are told people's livelihoods are at stake so this was done to strike a balance. A balance implies that the two sides have been levelled up but the only item on one side of the scales is the short term incomes of a few dredgers. On the other side of the scales is preventing serious damage to the environment, protecting the long term security of the commercial sector & protecting the interests of tens of thousands of recreational stakeholders whose source of food & recreation is negatively impacted by practices which damage entire food chains.

The economic argument has always been used to elevate the commercial sector to the top of the stakeholder list, despite the evidence pointing in the opposite direction. A study produced a couple of decades ago determined that the economic input generated by the recreational fishing industry far outweighed the input of the whole commercial catch fishery. There are now far more recreational fishers & far less commercial fishers & only a few dredgers. The marine leisure industry has also expanded significantly to a point where the value may exceed the recreational fishery. It's clear which side of the scales has all the weight on it but it's not possible to provide figures as there has been no interest in assessing the value of the other sectors.

The bass stock was allowed to collapse through overfishing. This pushed more fishers toward targeting the lobster stock. The lobster stock then was allowed to collapse through overfishing. This pushed more fishers toward dredging for scallops. Commercial species like bass & lobster are not just food items, they are predators & scavengers which sit at the top of food chains. Depleting stocks to the point of collapse will upset the ecological balance which can have wide reaching impacts. This ongoing cycle of mismanagement is not fair on other stakeholders & it's not fair on the environment.

The commercial industry may be its own worst enemy for blocking stock preservation measures in order to protect short term profits but they have only done what the system has allowed them to do. It's not their job to know what's best for the fishery & it's certainly not their job to decide what's best for the environment & the other stakeholders.

The action plan acknowledges that there is “widespread concern” regarding inshore gill netting. This is no surprise as our current inshore netting regulations were designed to reduce conflicts between nets & swimmers on some beaches. They were not designed to protect species, the environment or people outside of these areas.

The ongoing increase in leisure activity, including coastering, swimming, snorkelling & night diving raises well evidenced safety issues. A net which is just under the surface can't be seen from above water & below water so you are more likely to swim into it before seeing it, particularly at night. Scuba divers have more time to disentangle themselves but many local snorkel divers have had close escapes & some have had to climb over nets which were set inshore of them. Nets set in shallow water are also a hazard to boats, including rescue craft.

The shoreline is a diverse mix of habitats with a high concentration of resident fish species. Most are of little value commercially but they still end up caught in the nets. The vast majority of Recreational fishers are confined to the shore. They rely on the species found there to feed families & provide sport. Scuba divers & snorkelers go in the water to experience a world with fish in it.

It's most common to see 100m long nets placed in separate locations. This is done on an opportunist basis because fish stocks don't support continuous netting in the same place. There is nothing in the regulations to control the length of nets so there are occasions when long chains of nets are deployed, blocking off whole bays & sections of coast. Some netters make an effort to avoid areas which would result in high conflict. Others don't.

We are told the situation is equitable as everybody gets a fair chance to catch fish but this is far from the case. The commercials have no net limit & no daily catch limit, while even the low value bycatch species which are used for commercial pot bait are subject to strict recreational bag limits. Strings of commercial lobster pots are also set in the intertidal zone which is the only place low water fishers have access to. Bass & lobsters move in & out of the shoreline zone so removing netting & pots won't remove them as a source of commercial income.

The species found up against the shoreline are far more value to the economy & the environment if they are not targeted by high impact commercial fishing methods. The input to the economy plus the social & emotional benefits linked to thousands of shore fishers who use low impact methods must surely put them firmly at the top of the list, alongside the other sport & leisure users. Gill netting must surely come at the bottom of the list.

The shoreline zone where the conflicts occur encircles the Island & the offshore reefs. There will be pockets where conflicts are less serious but it would be impossible to enforce a zone which has lots of small chunks taken out & many shallow water species move parallel to the shore so this won't protect them.

The zone could extend a set distance from the water's edge & move in & out with the tide in the same way as the current 200m limit works. There will be areas where it makes more sense for the boundary to be in a fixed position, like along the north coast. The distance can change to avoid specific conflicts with wildlife colonies & sporting/leisure activities but a fixed distance is much more realistic from an enforcement viewpoint. The spatial plan is the perfect tool to determine where the boundary line needs to be set.

Creating net-free spatial zones is the most obvious solution but the MSP action plan instead proposes that these conflicts be resolved by better marking of nets & limiting shore netting to night time. This will certainly reduce some conflicts but it won't protect wildlife which is active at night or divers at night or address the high bycatch of fish species or the loss of recreational input to the economy. The short timescale imposed on the project is no excuse for omitting the most obvious solution.

Fisheries are always in a state of change. It doesn't matter how many fishers currently use nets or which areas are currently netted, they create serious conflicts in known areas so the job of the spatial plan is to determine which areas are acceptable to net & which are not. At this stage the process just needs to arrive at a solid conclusion regarding the use of netting-free zones as solution. If it fails to do this, every time conflicts crop up, we will be told that we will just have to put up with them because the MSP didn't support net-free zones.

Our obligation is to firstly protect the environment, then the economy, then the interests of the stakeholders in descending order of priority. It is acceptable to make reasonable concessions to accommodate any sector which has to make changes like compensation, gradually phasing out conflicting practices & relaxing boundaries where there are no serious consequences. It is not acceptable to swing the MSP process in favour of any stakeholder group.

The recreational sector is incredibly diverse with many opposing views but they will all agree when it comes to placing the interests of the environment first. The MSP won't stop political interference from trying to take over the narrative but it will make it much easier for Scrutiny to spot when this is happening. We don't have evidence to support all points made & some will no doubt be argued as opinion but they serve to draw attention to issues which cannot afford to go unchallenged.