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Consultation – summary of responses

To the Proposals for the Inshore Crustacean Fishery

Phase 1



Date of issue: August 2014

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Overview

The Vision of the Wales Marine and Fisheries Strategic Action Plan (M&FSAP),¹ which was published on 26 November 2013, is for clean, healthy, safe, productive and biologically diverse seas. The M&FSAP aims to introduce an ecosystems approach to the management of our seas protecting and preserving natural resources, using healthy populations as the basis to drive sustainable economic growth.

The challenge for fisheries managers is finding the balance between the need to avoid activity that harms our environment and the desire to maximise the value of activities that we can undertake sustainably. Shellfish have significant sustainable economic potential and the Welsh Government has a responsibility to manage these assets sustainably to ensure appropriate economic growth and the protection of livelihoods around our coast. The crustacean fishery (which includes Lobsters, Edible or Brown Crab, Crawfish, Spider Crab, Velvet Crab and Green Crab) is one of the largest commercial fisheries sectors in Wales.

The Welsh Government would like to see a viable and sustainable inshore crustacean fishery with simple and effective legislation to manage that fishery. The current rules and regulations used are complex and can cause confusion. There are multiple provisions and layers of secondary legislation which have been developed over time by the different bodies which previously managed the fisheries, often covering different geographical parts of Wales. Inevitably there are some overlaps, duplication and contradictions between the different sets of legislation. This is confusing for users and managers alike and is not a tenable position.

This consultation document sets out the proposals for Phase 1 of the review of all the relevant legislation that applies to crustaceans throughout Welsh waters. The wider review of legislation relating to crustaceans in Welsh waters will seek to achieve a clear and easy to understand “all Wales” framework for the management of the Welsh crustacean fishery. This work forms part of a wider review of all fisheries legislation which applies in relation to Wales (and the Welsh zone).

We believe we need new rules that are fair, evidence based, easy to understand and accessible. There will be more standardisation and fewer boundaries. They should be practical to enforce, fit in with current fishing practices and, where possible, reduce burden on both the industry and Government. The changes will enable better use and targeting of our natural resources.

¹ <http://wales.gov.uk/topics/environmentcountryside/fisheries/walesfisheriesstrategy/?lang=en>

Introduction

In April 2010 Welsh Ministers assumed full responsibility for fisheries management within the Welsh Zone, including the inshore fisheries out to 12 nautical miles, which is referred to as the Welsh Territorial Sea.

The former Minister for Natural Resources and Food agreed to launch a 12 week consultation on Proposals for the Inshore Crustacean Fishery (Phase 1).

Consultation Period and Distribution

The consultation commenced on 27th January 2014 and concluded on 20th April 2014.

The aim of the consultation was to seek views on the proposals for Phase 1 of the review of current legislation that applies to the Inshore Crustacean Fishery.

A letter advising Stakeholders of the consultation was sent to approximately 1500 stakeholders either by post or email and also provided details of the web address where the documents could be found. Whilst the consultation was available on line, Stakeholders were also given the option of contacting Welsh Government Officials to request a hard copy of the document.

Alongside the consultation a Response Form was distributed, which consisted of 11 specific questions and also gave respondents the opportunity to include comments on both Phase I and Phase II of the Legislation Review. In total there were 44 responses received to the consultation. A list of respondents is at Annex 1. Two further supplementary questions were put to all 44 respondents on 25 June with a deadline for responses on 4 July. These respondents were informed that if we did not receive a reply by the deadline, we would presume their response to be 'No comment' for the purposes of this consultation. This explains the increased number of 'No comments' when compared to the overall consultation response.

Responses

The Welsh Government would like to thank all those who responded to the consultation. All responses together with discussions held with small stakeholder groups and the Inshore Fisheries Groups (IFGs) will be considered and will feed into the decision regarding these proposals.

A broad range of stakeholders covering a wide range of interests responded. The majority of the respondents used the questionnaire provided; however a small number used a free text format.

Summary of key issues

Respondents are in support of the majority of the proposals and feel that there should be clear and consistent legislation across Wales. The majority of the responses received to the proposals were from the commercial sector (20) and the recreational sector (17). A further 7 responses were received, including representations from sectors such as, Fishermen's Associations (1) Merchants (1), Environmental Groups (2) and other non specified representatives (3).

A breakdown of Respondents by sector can be seen at Question 1 together with a further breakdown by area represented.

Although Respondents were invited to provide a 'Yes' or 'No' response to each question, they were also invited to provide additional comment against a specific question if they felt it was relevant. All comments quoted below are from separate consultation responses.

To show a true reflection of those in support, the % figure is based upon the number of respondents who provided a 'Yes' or 'No' response. Those who offered 'no comment' are not included in the calculation.

Q.2 Do you agree with the establishment of a Wales wide minimum size for lobster (*Homarus gammarus*) at 90mm

	For	Against	No comment	total	% Support
Q2	34	7	3	44	83%

Q.3 Do you agree with the establishment of a Wales wide Minimum size for brown crab (*Cancer pagurus*) (both genders) at 140mm ?

	For	Against	no comment	total	% Support
Q3	36	6	2	44	86%

Q.4 Do you agree with the establishment of a Wales wide Minimum size for spider crab (*Maia squinado*) both genders at 130mm ?

	For	Against	no comment	total	% Support
Q4	40	2	2	44	95%

Q.5 Do you agree with the establishment of a Wales wide Minimum size for Crawfish (*Pallinurus elephas*) at 110mm?

	For	Against	no comment	total	% Support
Q5	39	3	2	44	93%

Q.6 Do you agree with amending the legislation identified in this document that relate to velvet crab (*Liocarcinus puber*)?

	For	Against	no comment	total	% Support
Q6	37	4	3	44	90%

Q.7 Do you agree with extending the jurisdiction of the above minimum sizes out to twelve nautical miles in line with Welsh Territorial waters?

	For	Against	no comment	total	% Support
Q7	38	3	3	44	93%

Q.8 Do you agree with creating a carriage offence, whereby it is an offence to be in possession of the above species, below the minimum sizes stated above, even if caught outside Welsh territorial waters (12nm)?

	For	Against	no comment	total	% Support
Q8	36	5	3	44	88%

Q.9 Do you agree with the prohibition on fishing for, landing, selling, exposing or offering for sale or having in possession of berried (egg bearing) lobsters? This would mean that berried lobsters must be returned to the sea immediately?

	For	Against	no comment	total	% Support
Q9	23	19	2	44	55%

Supplementary questions asked were:

SQ.1. Do you agree with a prohibition on fishing for, landing, selling, exposing or offering for sale or having possession of any V-notched or mutilated lobsters? This would mean that V-notched or mutilated lobsters must be returned to the sea immediately?

	For	Against	no comment	total	% Support
SQ1	11	2	31	44	85%

SQ.2. Do you agree with the prohibition of retaining parts of Edible Crab, Spider Crab, Velvet Crab and Green Crab throughout the coast of Wales, out to a distance of 12 nautical miles from baselines?

	For	Against	no comment	total	% Support
SQ.2	11	2	31	44	85%

Questions

Q.1 What is your interest in the crustacean fishery? Please tick one of the boxes below that best describes your interest in the Crustacean fishery in Wales

The majority of responses received were from commercial fishermen, and were from the North Wales area.

Table 1: Responses received split by sector:

Category	Number of respondents	% Total number of respondents
Commercial fisherman	20	45
Hobby fisherman	17	39
Representative of a fishermen's group	1	2
Merchants	1	2
Environmental Interests	2	5
Other	1	2
Not specified	2	5
Total	44	100

Table 2: A breakdown of responses split by area:

Sector Represented	Total Responses	North	South
Commercial fisherman	20	16	4
Hobby fisherman	17	17	-
Representative of a fishermen's group	1	1	-
Merchants	1	1	-
Environmental Interests	2	2	
Other	1	1	-
Not specified	2	2	-

Q.2 Do you agree with the establishment of a Wales wide minimum size for lobster (*Homarus gammarus*) at 90mm?

The majority of respondents agreed with the proposal to increase the minimum size of lobster and felt this would benefit the Welsh fishing industry (34). However, whilst agreeing with the proposal, a number of respondents felt this change should be phased in over a 2/3 year period in order to reduce effect on fishers, particularly in North Wales. 7 disagreed with the proposals completely and 3 did not provide a response.

Comments received from those in favour of the proposals included:

- In terms of marketing and sustainability I think it is very important to increase sizes. By increasing landing size all female lobsters will get extra year or two releasing eggs.
- I believe that 87mm is too small anyway and don't keep lobsters under 90.
- I totally agree that the size should go up to 90mm but what does worry me is the amount at present of smaller fish on the ground. I believe this does cause fatalities in pots which are left for a long soak. I think if this 90 is brought in at the same time would be the ideal time to bring in compulsory escape hatches.
- I support the introduction of a minimum size of 90mm carapace length for all Welsh waters out to the 12nm.
- Raising the minimum size to 90mm will give better resilience to the lobster stock. It will also provide a better lobster value wise to the markets.
- I do believe in a size limit set across the board to avoid confusion, but only if it can be policed.
- As lobsters are cannibalistic the large ones will do more harm than good and don't reproduce as well as younger ones. I agree with raising the size. Will mean a big drop in catch in the short term.
- I agree with the size going up to 90mm but maybe move it up 1mm per year over the next 3 years so the effect is not so great in one season.
- Lobster and brown crab minimum size - I have ticked for the 90mm minimum size for lobster and 140mm for brown crab.
- Agree with raising size but will mean a big hit in the short term for North Wales and Cardigan Bay (old NW, NWSFC area)
- The proposals should cover land as well as at sea so any buyer purchasing undersize shellfish or any fisherman caught with undersize shellfish on land or

at sea should be prosecuted and the fines need to be large enough to deter any future offences.

- I have been a full time commercial lobster and crab fisherman for 31 years. The minimum size increases are long overdue and are very welcome.
- In my area there's problems with landing under 87mm lobster and under 130mm brown crab; the 90mm and 140mm will have to be enforced or all honest fishermen will be out of business.

Comments received from those against the proposals included:

- The raising the lobster size up to 90mm would have a devastating effect on the local fishery here in Trefor. Would mean going out of business within a year with catches being more than halved.
- Limiting the maximum size of lobster would take the fun out of catching them, increase fighting with claw loss or worse. One area where I fish I only catch small lobsters [87mm to 90mm] and on diving in this area, a large amount of the holding ground will only support this size of lobster. So raising the size limit will affect my catch quite substantially.
- The MLS is the only measure in the North Wales fishery that protects the resource, at present, apart from v-notching. It obviously works very well and without it the fishery would not exist as it does today. However in increasing the MLS significantly from 87mm to 90mm there are two problems. Firstly there would be a significant loss of 'select' lobsters from the catch. There is also another problem with an MLS increase. For some fishermen this increase in select discards will result in the retention of undersized lobsters.
- The 3m jump from 87mm to 90mm was too much too soon as this would be too much hardship on the smaller vessels in the industry and was agreed that 1mm a year should be implemented until 90mm was reached as it was deemed that the size would inevitably go up to 90mm to unify north and south.
- I don't feel sufficiently qualified to answers the questions, so I'm just making general comment. As a recreational fisherman like many others who come on holiday to Wales each summer & perhaps catches 3 or 4 lobsters a year during August - please do not make any new system or reporting system too onerous for us amateurs. Without the opportunity to potter about in a boat with 2 or 3 lobster pots for 3 weeks a year then I and my family, like others, might not come on holiday to Wales each summer.
- There has been a gradual increase in all crustaceans in the last 10 years. There is no need to increase the minimum size if the protection area is to be increased because this will help stock to increase even more due to more protection.

Q.3 Do you agree with the establishment of a Wales wide minimum size for brown crab (*Cancer pagurus*) (both genders) at 140mm?

There was support for this (36), 6 objected and 2 did not provide a response. However, comments received from Inshore Fisheries Groups seem to favour an Economic Impact Assessment being carried out before changes are implemented.

Comments received from those in favour of the proposals included:

- Lobster and brown crab minimum size - I have ticked for the 90mm minimum size for lobster and 140mm for brown crab. In my area there's problems with landing under 87mm lobster and under 130mm brown crab; the 90mm and 140mm will have to be enforced or all honest fishermen will be out of business.
- In terms of marketing and sustainability I think it is very important to increase sizes.

I support the introduction of a Brown/Edible Crab minimum size of 140mm for all Welsh waters out to the 12nm.

- It was agreed that should WG implement these new measures they should provide the measures with the appropriate sizes on it. Also it was strongly felt that a much stronger presence from Fisheries was necessary to keep check on the industry and deter any would be flouting of the law as the present level of patrol is no deterrent at all. It has been suggested that when the laws are blatantly broke that permits should be revoked and this would act as a much stronger deterrent.

Comments received from those against the proposals included:

- I don't agree with an increase in minimum size for Brown Crab. This is again mainly due to market and the fact that the population in North Wales appears very healthy. The local merchants dress crab for the restaurants, hotels and tourists in the summer. It is a fact that in our area the smaller crabs give the best meat yield. Many of the desirable crabs for dressing are in the 130mm-140mm bracket. I would lose a very significant part of my marketable catch which could not be supplemented with larger crab due to the sometimes watery nature of their meat. An increase in MLS would significantly impact on my earnings and to me Brown Crab population is very healthy so why give it further protection?
- Why have you all of a sudden wanted to change the legislation when there is an increase in crustaceans in our seas.

Q.4 Do you agree with the establishment of a Wales wide minimum size for spider crab (*Maia squinado*) both genders at 130mm?

There was overwhelming support for this proposal, with 40 responses agreeing to the change. Only 2 respondents objected and 2 did not provide a response.

Comments received from those in favour of the proposals included:

- It was agreed that should WG implement these new measures they should provide the measures with the appropriate sizes on it. Also it was strongly felt that a much stronger presence from Fisheries was necessary to keep check on the industry and deter any would be flouting of the law as the present level of patrol is no deterrent at all. It has been suggested that when the laws are blatantly broke that permits should be revoked and this would act as a much stronger deterrent.
- I support the proposals for the Spider Crab minimum size, but this must also include buyers in Wales.
- In terms of marketing and sustainability I think it is very important to increase sizes. Customers rarely want to purchase smaller sizes and often I have force them to at lower price. By increasing size we will have a much better quality product that is more sustainable and easier to sell at a premium price this is for both crab and lobster.

Respondents who did not support the proposals did not supply comment.

Q.5 Do you agree with the establishment of a Wales wide minimum size for Crawfish (*Pallinurus elehas*) at 110mm?

The majority of responses supported the proposal (39), with some respondents providing additional proposals. There were 3 objections and 2 who did not provide a response.

Comments received from those in favour of the proposals included:

- It was agreed that should WG implement these new measures they should provide the measures with the appropriate sizes on it. Also it was strongly felt that a much stronger presence from Fisheries was necessary to keep check on the industry and deter any would be flouting of the law as the present level of patrol is no deterrent at all. It has been suggested that when the laws are blatantly broke that permits should be revoked and this would act as a much stronger deterrent
- Can we include prohibition on landing berried crawfish?
- I support the proposals for the spider Crawfish/Spiny Lobster, but this must also include buyers in Wales.

- The proposals should cover land as well as at sea so any buyer purchasing undersize shellfish or any fisherman caught with undersize shellfish on land or at sea should be prosecuted and the fines need to be large enough to deter any future offences.

Comments received from those against the proposals included:

- Why change?
- Why have you all of a sudden wanted to change the legislation when there is an increase in crustaceans in our seas.

Q.6 Do you agree with amending the legislation identified in this document that relate to velvet crab?

Respondents were in support of this proposal with 38 supporting the proposal, 3 objecting and 3 not providing a response.

One comment received in favour of the proposal was:

- I support the proposals for the velvet crab, but this must also include buyers in Wales.

Q.7 Do you agree with extending the jurisdiction of the above minimum sizes out to twelve nautical miles in line with Welsh Territorial waters?

Once again there was support for this proposal with 36 respondents being favour of the proposal, 5 against and 3 not providing a response. Although there was support for this proposal no relevant comments were provided.

Comments received from those against the proposals included:

- Why change? Clearer phrasing of questions.
- Why have you all of a sudden wanted to change the legislation when there is an increase in crustaceans in our seas.

Q.8 Do you agree with creating a carriage offence, whereby it is an offence to be in possession of the above species, below the minimum sizes stated above, even if caught outside Welsh territorial waters (12nm)?

Comments received from those in favour of the proposals included:

- I also support the introduction of a carriage offense out to the 12nm, but the carriage offense must extend to cover the land, to insure that crabs/lobster below the Welsh minimum size can not be purchased over land by buyers.

The proposals should cover land as well as at sea so any buyer purchasing undersize shellfish or any fisherman caught with undersize shellfish on land or

at sea should be prosecuted and the fines need to be large enough to deter any future offences.

Comments received from those against the proposals included:

- I don't believe the fisheries has enough resources to police inside the 6nm let alone spreading themselves even thinner and further out to 12nm at the cost of reduced policing inshore.
- Why change? Clearer phrasing of questions.
- Why have you all of a sudden wanted to change the legislation when there is an increase in crustaceans in our seas.

Q.9 Do you agree with the prohibition on fishing for, landing, selling, exposing or offering for sale or having in possession of berried (egg bearing) lobsters? This would mean that berried lobsters must be returned to the sea immediately?

Whilst there was support for this proposal (23), 19 respondents objected with 2 did not provide a response.

Comments were varied, however, respondents felt this proposal would be difficult to enforce.

Comments received from those in favour of the proposals included:

- I totally agree with the prohibition of fishing for, landing, selling, exposing, offering for sale or possessing berried lobsters.
- All berried hens should be returned unharmed immediately to help towards a sustainable population. It should be an offence to land a berried hen.
- A year round ban on berried hens was chosen because it was felt that protecting all hens in June and July was a fruitless exercise, what's the point protecting all females for a few lobsters that remain with eyed eggs when for the previous nine months most of them have been harvested anyway.

Comments received from those against the proposals included:

- The reason I have said no is because some fishermen would resort to the washing off of the lobster eggs which might result in the death or damage to the lobsters. I strongly believe in protecting our species.
- The only negative comment I have to make is regarding the banning of the landing of berried hens. This proposal is unenforceable and will only result in bonafide fishermen losing.

- A berried lobster is very aggressive and have a large territory. A ban on berried lobsters will cause more fighting with claw loss or worse and also reduce the holding capacity of good lobster ground.
- Again I'll be happy to go out of my way to bring them in and take them back out and return them if there is some sort of scheme rather than just being held to ransom with legislation.
- Pretty pointless as some fishermen will scrub berried lobsters and as these can make up at half to three quarters of a day's catch
- Have agreed with all proposals except the berried lobster one. Already at 87mm minimum size a considerable number of berried lobsters are released, at the proposed increase to 90mm there will be another and probably greater additional number of mature (berried) released as being undersized. Practical terms, it is much more difficult to police than a minimum size.
- I do not agree with the berried hens being put back in continuously but I do think that there should be certain months of the year when berried should be put back in
- Do not agree because A) 90mm size will give all stock more time to breed B) Not enforceable C) Combined with size increase would reduce catches in North by 75% and more, putting people out of business. Lobster stock is healthy and good now. Not under threat, problem is poor markets not lack of fish.
- Berried lobster over a certain size should not be landed say 1 kg or equivalent average length if this can be policed
- Berried lobster - I do not agree with a prohibition on landing berried lobster because I don't believe that we can enforce this
- At this stage I do not support the banning of landing berried hen lobsters, as there is insufficient underpinning scientific evidence to prove that returning berried hens to Welsh waters will benefit Welsh fishermen directly.
- I am not against the landing of berried hens, I feel to return all of them would have a big impact on already declining earnings.

Following receipt of the above responses, the 44 respondents were also asked to consider two further supplementary questions:

SQ.1. Do you agree with a prohibition on fishing for, landing, selling, exposing or offering for sale or having possession of any V-notched or mutilated lobsters? This would mean that V-notched or mutilated lobsters must be returned to the sea immediately

Of those who responded (12) 10 were in favour of this proposal.

Comments received from those in favour of the proposals included:

- I support the proposal for V-notched lobsters but this must also include buyers within Wales.
- With work already done regarding V notching for stock enhancement to take out V notch protection would be counterproductive as soft and buried hens which are currently notched would become unprotected. All the measures you are introducing are good for stock enhancement but without effort control the effort would only increase making all these new regulations futile.

Comments received from those against the proposals included:

- V notching females would unbalance the male/female ration which is a bad thing and would be extra work and expense to enforce. The lobster stock is very healthy but a nationwide 90mm mls wouldn't be a bad thing.
- Don't like V-notching, lot of room for error, accidental damage, plus large aggressive hens killing other lobsters in pots.

SQ. 2. Do you agree with the prohibition of retaining parts of Edible Crab, Spider Crab, Velvet Crab and Green Crab throughout the coast of Wales, out to a distance of 12 nautical miles from baselines?

Of those who responded (12) 10 were in favour of this proposal.

Comments received from those in favour of the proposals included:

- I support the proposals for the removal of parts of crustaceans, but this must also include buyers in Wales.
- 100% agree
- The proposals appear to be a sensible approach to the issues and a proactive method to close existing loopholes. Furthermore it provides a clear mechanism to eliminate unsustainable practices and strengthen enforcement.

Comments received from those against the proposals included:

- Current Practice among static net fishermen is to remove one or both claws from edible crabs to facilitate removal from the net. The remainder of the crab is then returned to the sea. Although the survival rate of return crabs is not

known, it would appear that some do, as some are caught with claws in the process of regeneration. If the ban on landing removed claws is brought in, it is likely that the fishermen would resort to smashing the whole crab rather than removing its claws. Thus it is likely that the stock of crabs will be reduced, albeit by an unknown amount. Further research on the survival rates of crabs without claws may clarify this issue.

- What does parts mean, do you mean pots, where I don't think it matters from what I can see there are plenty, and a sustainable quantity of these crustacean, if anything in the last 3 years the numbers have been increasing, so I don't think it is necessary to stop people retaining parts/pots of any of these crustacean.

Q.10 Do you have any comment to make regarding the proposals outlined in Part II?

In Part II of the consultation, stakeholders were asked to provide comment on proposals which are being considered for inclusion in phase 2 of the Crustacean Review. Proposals put forward in Part II provoked mixed reactions from stakeholders.

Lobster/Crab Pot Escape Gaps

There was very little support for the use of escape gaps in lobster/crab pots with fishers believing they were unnecessary.

Comments received were varied and included:

- I also think that the introduction of an escape hatch for smaller crustaceans is an excellent idea and thought of incorporating it myself last year but wasn't sure how or what size.
- I think they are sensible protection. I agree with undersized escape hatches. Commercial fishermen will have increased workload with biodegradable elements of the traps.
- It also noted that "A ban on the landing of berried females, effort reduction and an increase in the MLS would produce the greatest increases in eggs per recruit. Of these measures, only an increase in MLS would result in a greater yield per recruit. Therefore, in addition to the current ban on landing berried females an increase in the minimum landing size would be the most effective means of ensuring recruitment to the fishery."
- Escape hatches do concern me as I use the same creels for lobster fishing and for winter velvet fishing so this would pretty much ruin a vital fishery.
- Unnecessary.

- As I don't land velvet crab now I use escape gaps on the majority of my pots, the size used in the Channel Islands I think. As a result I catch very few undersized lobster and crab which reduces clearing time significantly.
- Extra expense and not needed.
- Only being recreational fisherman if pots must have escape gaps does this mean we will have to use different pots for each type we might find in a pot
- We welcome the commitment by Welsh Government to investigate the scientific value of using escape gaps to release undersize crustaceans. We support the gathering of scientific data by the Bangor School of Ocean Sciences to underpin this initiative.
- Whilst we would welcome further consideration of escape gaps, it should be utilised in conjunction with other measures, and effort should be made to monitor the effects on landing sizes should this measure be introduced. With this in mind, it would seem prudent that Welsh Government look to utilising the EMFF to fund any such measures to gain the best understanding of this approach.
- I have seen the black plastic escape gaps 80 x 45mm, although I have never tried one myself i would be interested to hear any research on this. I think I would be concerned that small crabs would have easier access to the pot and therefore deplete the bait more quickly?

Ghost Fishing

Comments received were limited and included:

- Not a problem in my experience.
- Mandatory incorporation of low cost effective biodegradable materials into fishing pots would be a welcome measure to alleviate ghost fishing in Wales.

Maximum Landing Size for Lobsters

Comments received were varied and included:

- I do think the proposed MaxLS of 12-130mm is a bit small and could affect fishermen working offshore. I would suggest one of 140mm+.
- The introduction of maximum landing sizes (MLS) for lobster could be beneficial as it would potentially increase the reproductive capacity by allowing larger more fecund individuals to remain in the fishery, contributing towards a healthier population.

- Waste of time, not possible to fix a size that suits both North and South Wales
- The supporting scientific evidence which accompanied the consultation showed that there is very few large lobsters within the fishery. This is not the case and landing for select lobster and large lobsters are roughly equal by weight. An introduction of a maximum size would have catastrophic effects on the economic viability of the fishery, it would also reduce the amount of select lobsters available to catch as larger lobsters remained on the ground dominating the fishery
- The maximum size of 140mm for lobster was rejected.
- We understand that a maximum landing size is already used in a number of fisheries in Scotland, in part due to issues with being able to market lobsters over a certain size. However it would be prudent to ensure that this measure has had a tangible improvement on fisheries in Scotland, either alone or in conjunction with other measures before applying this to the Welsh lobster fishery. It should also be noted that any such restriction should also apply to non-commercial fishing to ensure it is not undermined by un-regulated fishing.

Diving & Netting for Crawfish

Comments received were varied and included:

- I would never support a ban on netting for crawfish.
- All members agreed that crawfish should only be caught with pots and that netting and diving for them should be prohibited. It was also agreed that they should receive full protection for a five year period to see if stocks could recover or attempt a restocking programme if funding could be sought, with the programme being assessed by an independent body every five years.
- Before consideration is given to controlling the proposed fishery mechanisms for crawfish it would be advisable to return the stock to MSY levels. Only when the stock is in a self-sustaining condition should consideration be given to how much of the stock can be removed and by what method.
- Natural Resources Wales appreciates that this is only the first part of the crustacean management proposals for Wales and we support the Welsh Government's proposal to establish an increased Wales wide MLS for crawfish of 110mm, even though it is not supported by clear scientific evidence.

Non-Commercial Potting

Comments received were varied and included:

- Also you need to look at the five pot policy per person.

- Recreational lobster fishermen should be stopped from selling lobsters. More policing required by either boarding or landing inspections.
- I believe that the right for recreational fishermen to catch a limited number of crustacean for personal consumption should be maintained
- Unlicensed fishermen are on the increase throughout Pembrokeshire, many of whom sell their catches through the black market, this affects licensed fishermen, I support some type of restriction
- I believe that the right for recreational fishermen to catch a limited number of crustacean for personal consumption should be maintained
- Recreational lobster fishermen should be stopped from selling lobsters.
- It is our view that it is important to manage all fisheries to deliver the ecosystem based approach and so resource is shared more equitably and sustainably.
- Consideration should also be given to pot marking of non-commercial pots.

Permit Scheme for Commercial Fishermen

Comments received were varied and included:

- I do not support a permit scheme, I feel that to own a licensed and registered boat is all that should be required.
- We welcome Welsh governments view that crustacean fisheries may require effort limitation to ensure both a sustainable fishery and a sustainable industry.
- The introduction of a restricted permit scheme for certain fisheries would be welcome provided it contributed towards the achievement of MSY.

Minimum Size for Green Crab (*Carcinus maenas*)

Comments received were varied and included:

- I wouldn't support such a measure.
- Establishing a minimum landing size for green crab would be welcomed and must be underpinned by robust science.

Q. 11 We have asked a number of specific questions. If you have any comments relating to these questions please use this space to report them. Please keep each comment separate.

Comments received were varied and included:

- They are all realistic and reasonable. It's not right to have different regulations across the county and minimum catch sizes are fair.
- I believe that the proposals in question are a fantastic idea and realistic with regards to being able to maintain a healthy stock of lobster and supporting the need of both commercial and recreational fishermen.
- On the whole I believe any steps taken to protect future stocks within reason can only be a good thing.
- We support the Welsh Government's intention to consider additional management measures for Welsh crustacean fisheries in a further consultation process. However, before these additional measures are adopted, the evidence base for doing so must be clearly presented and examined.
- We welcome a number of the outlined proposals, and hopes that Welsh Government will take the necessary steps to ensure their delivery. However we note that a number of the proposals will be difficult to enforce without co-operation of the industry and therefore hope that sufficient discussion has been had to ensure implementation of these proposals in a co-operative fashion.

Next Steps

The responses to the consultation will be considered by the Deputy Minister for Agriculture & Fisheries for a decision to be made on the way forward.

List of Respondents *

David Nicholson
Richard Boyce
Andrew Wilson
Dr Chris Hawksley
Norman Scott
Denver Beer
Martin Esseen
Bob J Wright
Carl Davies
David Barker
John James Gorman
Steven James
Idwal Moor
Ryan Horton
Stephen DeWaine
Robert James Gorman
Martyn Bowen
Tristan Woods
Clive Campbell
Chris Jones
Llyn Fishermens Association
Paul Mansel
Richard Andrew Stothert
Sion Williams
Wales Environment Link
Natural Resources Wales
Dan Angel
Dene Wright
Alastair Bresford

*** The above do not include those who wish to be kept anonymous or confidential.**