

Addressed to:

European commission
in charge to Sea bass regulation.

Subject: FNPSA Positions regarding the measures proposed by the European Commission to regulate sea bass fishing in the North Sea and in the Channel for 2017

Our Federation is committed for several years for the management of fishery resources and for the conservation of marine areas and species of interest. For this we have established environmental commissions composed partly of experts in fisheries, ecology and aquaculture. Their mission is to carry out a survey, to communicate, operations of community volunteering science and collaboration with scientists and managers of protected marine areas. We also pledge our league, our clubs and their licensees practicing their activities by adopting an active eco-responsible attitude, as evidenced by our charter.

The decrease in biomass sea bass stock in "North" area (ICES IVbc Division VIIa, VIId-h) since 2010, due to very low recruitment between 2008 and 2012 in a mortality context by professional and recreational fishing globally up, led the European Commission to take emergency measures during year 2015. These measures have included to ban pelagic trawling from January to April, to set a minimum conservation reference size of 42 cm and to limit the monthly landings by professional fishermen and recreational fishermen daily landings to a maximum of 3 individuals per day per fisherman. Recognizing the need to better manage the exploitation of this stock, the FNPSA welcomed these strong measures and considers that they are likely to ensure a level of mortality associated to recreational fishing consistent with an environmentally responsible management.

In 2016, even before the benefit of these measures to the stock is noticed, the European Commission has drastically reduced fishing opportunities. For professionals, the fishery was closed from January to June for trawls and February-March for lines and nets, and monthly quotas were reduced. For recreational fishermen, fishing was forbidden from January to June and the daily landings reduced to one individual per day per fisherman.

FNPSA believes, based on its observations of recreational fishing activities, that these new extremely strong measures have reduced sea bass fishing mortality by more than 50 percent between 2015 and 2016. This is in effect due to halving the allowed fishing period and reducing the maximum number of sea bass landed per day by three. These measures also led the decreasing of fishing trips frequency for a significant part of anglers, even the cessation of all fishing activities for some. To justify these observations, FNPSA also initiate a study to assess the level of reduction of fishing mortality by analyzing the fishing notebooks of a sample of its members.

Furthermore, FNPSA is of course in favor to a fishing closure during reproduction but would like to remind the inconsistency between the seasonal closure implemented from January 1st to June 30th and the reproductive period. Indeed, sea bass reproductive period in the Western Channel occurs from January to end April, with a more intense spawning season centered on March (Fritsch, 2005¹).

This author specifies that the full spawning season would take place between mid-February and late March - early April. So the seasonal closure is extended 2 months beyond the reproductive period.

The diagnostic published by ICES in 2016 shows that the spawning biomass has continued to decline, however, the 2013 recruitment has been good. Note that the level of recruitment in 2014, 2015 and 2016 is still unknown due to lack of data available to assess the abundance of corresponding age groups. Forecasting the stock in 2016, ICES has retained the assumption of the status quo for fishing mortality, leading to an assessment of spawning biomass below the precautionary biomass in 2016. Based on this diagnostic, ICES recommend that there should be zero catch (commercial and recreational) in 2017. This recommendation was reiterated by the European Commission in its catch proposals for 2017.

FNPSA contest the lack of consideration by ICES regarding the last management measures through the choice of a status quo as fishing mortality hypothesis in 2016 and the undervaluation of spawning stock resulting. Quite the opposite, FNPSA believes that fishing mortality has decreased by over 50 percent from 2015, as result to the last measures and request to ICES to reconsider its advice on this basis.

FNPSA also wishes to warn of the impact on the economy related to leisure and tourism of draconian restrictions taken in 2016 and the impact that could have a moratorium. It is estimated that all expenses related to the only recreational fishing activity at sea are around 2 billion Euros per year. If we consider all the boating activities bound to the recreational fishing, estimation goes up to 5 billion Euros per year.

Therefore, FNPSA is opposed to the moratorium recommended by ICES and European Commission and wish expose its positions:

- Going back to a quota of 3 bars per day per fisherman which ensures a level of mortality associated with recreational fishing consistent with responsible management while maintaining the economic activity of leisure and tourism associated with the fishery for bass
- Adapt the seasonal closure to the reproductive season, from January 1st to April 30th.

¹ Fritsch Manon (2005). Traits biologiques et exploitation du bar commun *Dicentrarchus labrax* (L.) dans les pêcheries françaises de la Manche et du golfe de Gascogne. PhD Thesis, Université de Bretagne Occidentale. <http://archimer.ifremer.fr/doc/00000/1088/>



FEDERATION NAUTIQUE DE PECHE SPORTIVE EN APNEE

Siège social: 46, rue Montpensier – 64000 PAU

Secrétariat: Boite postale N°36 – 29910 Trégunc – Tél: 02 98 06 57 76

Email: fnpsa.secretariatfederal@orange.fr – **Site web:** www.fnpsa.net