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Cymru**  
**Natural  
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Marine & Fisheries Division  
Welsh Government  
Llys y Draig  
Penllergaer Business Park  
Penllergaer  
Swansea  
SA4 9NX

10 June 2017

**By email**

### **Whelk Consultation Response**

Dear Welsh Government,

Natural Resources Wales works to make sure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used, now and in the future.

We welcome the opportunity to respond to the consultation on the proposed sustainable management measure for the Welsh whelk fishery. Please find our response to the consultation below.

If you require any further information please contact Colin Charman, Marine Fisheries Advisor on [colin.charman@cyfoethnaturiolcymru.gov.uk](mailto:colin.charman@cyfoethnaturiolcymru.gov.uk) or 03000654965

Yours sincerely

Keith Davies  
Planning, landscape, energy and Climate Change Manager

# CONSULTATION RESPONSE FORM

## New Management Measures for the Whelk Fishery in Wales

Name: Colin Charman

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Organisation (if applicable) Natural Resources Wales

Telephone No: 03000654965

Email: Colin.charman@cyfoethnaturiolcymru.gov.uk

1. What is your interest in the whelk fishing industry in Wales? (Please tick **one** of the boxes below that best describes your interest in the Whelk fishery in Wales).

Commercial Whelk fisherman

Commercial Shell fisherman

Recreational Shell fisherman

Merchant/Processor (please state)  \_\_\_\_\_

Environment / Conservation  X

Other (please state)  \_\_\_\_\_

2. Do you support an increase in Minimum Conservation Reference Size (MCRS) from 45 mm shell length to 65mm shell length

Yes  X      No

3. Do you think an increase in MCRS should be a phased approach? For example, over, 2, or 3 years?

Yes X

No

4. If you have answered 'YES' to question 3, please state the period you think would be appropriate:

A minimum number of phased increases in MCRS is recommended as fishers could possibly incur re-tooling costs if they have to change their measuring process.

Natural Resources Wales support the Welsh Government's proposal to increase the MCRS of whelks in Welsh waters to 65mm. However, the various geographically relevant scientific papers, attached in Annex 1, indicate that the MCRS for whelks in the Celtic and Irish Seas surrounding Wales is greater than 65mm. Natural Resources Wales would recommend an MCRS, informed by the relevant papers, that will allow a significant proportion of the whelk population to breed at least once before capture. This MCRS may be closer to 75 or 80mm and would contribute to the long term sustainable management of the stock.

5. Do you support the introduction of a permit scheme for vessels fishing for whelks in Welsh waters?

Yes X

No

6. Do you support the introduction of flexible conditions to the permit which could be reviewed periodically? For example, flexible catch allowances?

Yes X

No

7. Do you think that the number of permits should be limited?

Yes X

No

8. Do you consider 'Effort Control' to be an acceptable condition to apply to the permit?

Yes X

No

9. Do you support a cap on the weight of whelks that can be landed per month?

Yes X

No

10. Do you support a cap on the number of pots that can be fished?

Yes X

No

11. Do you consider 'Data Collection Requirements' to be an acceptable condition to apply to the permit?

Yes X

No

12. Do you consider a 'Closed Season' to be an appropriate management tool, particularly during the spawning season?

Yes X

No

13. Do you support the use of escape holes?

Yes X

No

14. Do you support that all whelks should be landed in fish boxes or net sacks weighing no more than 40kg each when full of whelks?

Yes

No

15. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Natural Resources Wales works to make sure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used, now and in the future.

Natural Resources Wales supports the proposal that the Welsh whelk fishery should be a permitted fishery. The permits should include a range of flexible conditions to allow Welsh Government to deliver sustainable management of this natural resource. These periodically reviewed conditions should be informed by concurrent and relevant scientific stock assessment data to allow the Regulator to react to environmental conditions and change.

Currently the fishing effort within the Welsh whelk fishery is not subject to any effort controls. Controlling the amount of effort expended by fishermen within the fishery will be a key mechanism to delivering sustainable management. This can be achieved by utilising a combination of the proposals put forward in the consultation, such as:

- Limiting the number of permits
- Capping the weight of whelks that can be landed in a given time period
- Limiting the number of pots fished by permit holders
- Catch allowances

Catch allowances or Total Allowable Catch (TAC) should be informed by concurrent and relevant scientific stock assessment data so that the fishery is being fished within safe biological limits. This data and analysis should be informed and supported by proposal 11 on data collection requirements, with fishers providing detailed mandatory fishery data as part of the proposed permit conditions e.g. location of activity, weight/size of discards etc.

Natural Resources Wales supports the introduction of spatial and temporal restrictions through permit conditions. These types of conditions can also be used as additional methods to control effort and to limit the environmental impacts from the fishery, for example closed periods during sensitive spawning times. If these mechanisms are available to managers in an adaptive format, as conditions to a permit, managers can react, in consultation with the industry and at short notice if necessary, to specific environmental or fishery management issues.

In combination with increasing the MCRS of whelks in Welsh waters Natural Resources Wales would support the introduction of escape holes for undersized marine species.

Standardising the unit of landing of whelks to 40kg is a management decision for Welsh Government to aid transparency and compliance. Welsh Government may also consider labelling bags and pots with permit numbers.

**Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:**

Annex 1: List of relevant scientific papers on whelk MCRS

**1988. Bell, M.C., and Walker, P; Size at maturity in common whelks *Buccinum undatum* L., in England and Wales. ICES CM1998/CC:9**

**2006. J. A. Hemer; An assessment of biological and population parameters of the Common whelk, *Buccinum undatum* (L.) in the region of the North West Irish whelk fishery**

**2013. Lawler. A. DEFRA MF0231. A. Lawler; Determination of the Size of Maturity of the Whelk *Buccinum undatum* in English Waters**

**2015. Cefas Report. Edmonds N. & Masefield R.; Determination of Size at Maturity of the Whelk *Buccinum undatum* in Welsh Waters.**

**2015 (1). Report 50. Jodie A. Haig, Julia R. Pantin, Harriet Salomonsen, Lee G. Murray & Michel J. Kaiser: The size at maturity for the common whelk, *Buccinum undatum* in Welsh waters, with an industry perspective on minimum landing sizes**

**2015 (2). Jodie A. Haig\*, Julia R. Pantin, Harriet Salomonsen, Lee G. Murray, and Michel J. Kaiser; Temporal and spatial variation in size at maturity of the common whelk (*Buccinum undatum*)**

**2015. Devon and Severn IFCA Research Report. K. Stephenson; Determination of the Size of Maturity of the Whelk *Buccinum undatum* within the Devon & Severn IFCA District**

**2016. Devon and Severn IFCA Research Report. K. Stephenson; Determination of the Size of Maturity of the Whelk *Buccinum undatum* within the Devon & Severn IFCA District Supplementary Report: Start Bay**

**2017 Report 68. J.A. Emmerson, I.S.M. Bloor & M.J. Kaiser; Proposals for Future Management of the Isle of Man Common Whelk Fishery: The Current Evidence Base.**