

sent to ifcabylaws@marinemanagement.org.uk; enquiries@cornwall-ifca.gov.uk

Cornwall Wildlife Trust
Five Acres
Allet
16th January 2025

Dear Sir or Madam

I am writing on behalf of Cornwall Wildlife Trust, and the Cornwall Good Seafood Guide to formally support the proposal for Crustacean and Molluscan Fisheries (Vessel Specifications) Bylaw 2024.

The crab and lobster fishery in Cornwall needs better management to ensure the long-term viability of the fishery and protection of our marine ecosystem. Cornwall Wildlife Trust staff and trustees have long thought that excessive effort in this vital sector of our fishery as a result of insufficient management was a major concern and this is backed up by the views of many local fishers whose opinions we respect and value.

The dire situation facing shellfish fisheries is backed up by our work on Cornwall Good Seafood guide (CGSG). It was extremely disappointing that in summer 2024 the CGSG sustainability rating for brown crab was downgraded, leaving our recommended list for the first time ever in the projects 9 year history. Cornish pot caught brown crab is now rated as a 4 (on a scale of 1 to 5 with one being the most sustainable and five being seafood to avoid) – our ratings are calculated using the MCS wild capture methodology that ensures all seafood ratings are fair and comparable across the world. The reason that the rating was downgraded is firstly due to evidence from CEFAS stock assessment 2023 showing that stocks of brown crab in our area are below sustainable levels and fishing pressure is too high to ensure that stocks don't continue to decline, a trend that was also shown in CIFCA shellfish permit summary statistics 2022 in terms of decreased landings per unit effort for pot and net caught brown crab in Cornish waters. Secondly the management score for brown crab was poor as without a harvest control rule of any kind (i.e. catch limit or effort limit) it is impossible to provide a good sustainability score for management. Our seafood ratings are publicly consulted on and no objections were raised to counter the downgrade and no contrary evidence was provided.

There has been a clear trend in investment in larger vessels in recent years within a fleet that has for decades already been too big for the fishery. The increase in large nomadic crabbing vessels equipped with vivier tanks has enabled a steep increase in effort and has threatened the sustainability of the entire fishery. The proposed byelaw will only affect 6 existing vivier boats who will still be able to fish outside the CIFCA district, so it will not significantly adversely affect their operation, however not having a ban on this sector of large efficient boats will threaten the long-term future of the fishery significantly. The crab and lobster fishery is highly valuable to

Cornwall's coastal economy and culture and due to the selective nature of the fishery it has potential to again be our most sustainable long term fishery but management, particularly catch limits are needed urgently to see this happening and to safeguard our shellfish stocks and Cornwall's shellfish fishery.

We appreciate the way that CIFCA has consulted widely with the fishers on the issues of management of crab and lobster fisheries and note that 74% of fishers who responded in the recent survey are in favour of limitation on size of vessels operating in the district. The rapid increase in effort by the vivier fleet (just six boats currently) and the excellent research presented in the summary report by CIFCA shows that the risks of allowing vivier vessels to continue to fish in our waters, in numbers unchecked, could very soon result in a collapse in crab and lobster stocks and risk the livelihoods of hundreds of small scale coastal crab and lobster fishers.

We sincerely hope that this byelaw is adopted and that further effort management bylaws to limit catches of crab and lobster can be brought in with some urgency.

Yours sincerely

Matt Slater
Marine Conservation Officer
Cornwall Wildlife Trust