



**Cyfoeth  
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Cymru  
**Natural  
Resources**  
Wales

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Whelk Management Measures 2020 Consultation  
Marine and Fisheries Division  
Welsh Government Office  
Sarn Mynach  
Llandudno Junction  
Conwy  
LL31 9RZ

4<sup>th</sup> June 2020

**By email only**

**Natural Resources Wales' Response to Welsh Government's Whelk Management Measures 2020 Consultation**

Dear Sir / Madam,

Natural Resources Wales (NRW) welcomes the opportunity to respond to the Whelk Management Measures 2020 consultation.

The statutory purpose of NRW is set out under the Environment (Wales) Act 2016. In the exercise of its functions under that Act, NRW must pursue the sustainable management of natural resources in relation to all its work in Wales, and apply the principles of sustainable management of natural resources (SMNR) in so far as that is consistent with the proper exercise of its functions. NRW's duty, in common with the other public bodies that are covered by the Well-Being of Future Generations (Wales) Act 2015, is to carry out sustainable development.

NRW is also a Statutory Nature Conservation Body under the Conservation of Habitats and Species Regulations 2017, as further amended by paragraph 189 of the Natural Resources Body for Wales (Functions) Order 2013, and an advisor to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

NRW's response to the consultation appended below, is provided in the context of the statutory purpose, functions and duties outlined above.

If you require any further information or would like to discuss any of the points that we have raised, please contact our Lead Specialist Advisor for Marine Fisheries, Sean Evans, via [sean.evans@cyfoethnaturiolcymru.gov.uk](mailto:sean.evans@cyfoethnaturiolcymru.gov.uk) or 0300 065 3712 in the first instance.

Yn gywir / Yours sincerely

A handwritten signature in purple ink that reads "R. Jenkins". The signature is written in a cursive style with a large initial "R".

Ruth Jenkins  
Head of Natural Resource Management Policy

**Cc: Ruth Jenkins (NRW)**  
**Keith Davies (NRW)**  
**Mary Lewis (NRW)**  
**Ann Purser (NRW)**

## Appendix

### Whelk Management Measures 2020

#### Consultation Response Form

Name Sean Evans

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Cardiff  
CF24 0TP

Organisation (if applicable) Natural Resources Wales (NRW)

Telephone No. 03000 65 3712

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*What is your involvement in the fishing industry?*

- |                                   |                                     |       |
|-----------------------------------|-------------------------------------|-------|
| Commercial Fisherman              | <input type="checkbox"/>            |       |
| Recreational Fisherman            | <input type="checkbox"/>            |       |
| Merchant/Processor (please state) | <input type="checkbox"/>            | _____ |
| Environment / Conservation        | <input checked="" type="checkbox"/> |       |
| Other (please state)              | <input type="checkbox"/>            | _____ |
- 

1. *Do you agree with the Welsh Government's primary objective to conserve whelk stocks and thereby stabilise the Welsh whelk fishery?*

Yes                       No                       No comment

2. *Do you agree it should be prohibited for UK vessels to take whelk with pots from the Welsh zone without an authorisation?*

Yes                       No                       No comment

3. *Do you agree authorisations should be issued annually from the period beginning of March in one year to the end of February in the following year?*

Yes  No  No comment

4. *Do you agree the Welsh Government should charge a fee for an authorisation?*

Yes  No  No comment

5. *Do you agree with the process to set future landing caps in Box 2?*

Yes  No  No comment

6. *Do you agree it should be prohibited for vessel owners to fish beyond the authorised monthly landing cap?*

Yes  No  No comment

7. *Do you agree authorisation holders should provide statistical information to the Welsh Government, such as numbers of pots fished, amount of undersized whelk, location of fishing activity etc. to assist with stock assessment calculations?*

Yes  No  No comment

8. *Do you agree authorisation holders should be required to gather data (as described in paragraph 44) to assist with stock assessment calculations?*

Yes  No  No comment

9. *Do you agree authorisation holders should provide landings data direct to Welsh Government?*

Yes  No  No comment

10. *Do you agree the Welsh Government should ban authorised vessels from retaining or landing de-shelled whelk?*

Yes  No  No comment

11. *Do you agree authorisation holders should be required to have an active and functioning Vessel Monitoring System on board when fishing whelk with pots in the Welsh zone?*

Yes  No  No comment

12. *We would like to know your views on the effects of issuing whelk authorisations with a flexible landing cap on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.*

*What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?*

*Please enter your response here:*

No comment made

*13. Please also explain how you believe the issuing of whelk authorisations with a flexible landing cap could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English Language.*

*Please enter your response here:*

No comment made

*14. 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:*

*Please enter your response here:*

NRW welcomes Welsh Government's stated commitment to the conservation and sustainable management of fisheries, and its specific recognition of the need to put in place a package of measures to "*conserve stocks and ensure the sustainability of the Welsh whelk fishery*". NRW supports the proposed introduction of a flexible whelk authorisation scheme for all UK vessels taking whelk with pots in the Welsh Zone, inclusive of: an annual limit on the total amount of whelk that can be taken from that Zone; a variable monthly landing cap for authorised vessels; and the suite of associated conditions.

NRW considers that the proposed introduction of evidence-based effort control, through a total annual limit (to ultimately be informed by stock assessment) and a flexible monthly landings cap as a means of ensuring that the total annual limit is not exceeded, is fundamental to the sustainable management of Welsh whelk resources.

To this end, NRW welcomes efforts currently underway to put in place an appropriate stock assessment regime for Welsh whelk resources, and the Welsh Government's aim of completing "*the first whelk stock assessment by Spring 2021*". In the absence of comprehensive stock assessment information at present, NRW supports the proposed introduction of a total annual limit based on the average annual amount of whelk landed by UK vessels into Wales over the 2015 – 2019 reference period, as a means of preventing further increases in exploitation of whelk beyond current levels in the short term.

NRW considers up to date information on catch, landings and other statistics to be essential for the delivery of informed and adaptive fisheries management. NRW is,

therefore, supportive of the proposed requirement for authorisation holders to provide statistical information and landings data directly to the Welsh Government. Specifically, NRW considers that the provision of data on landings and effort (e.g. number of pots fished and pot soak time) is fundamental to both the timely monitoring of total annual limit uptake, thereby ensuring that such limits are not exceeded for a given year, and the understanding of key fisheries metrics such as catch per unit effort.

NRW supports the principle of charging a fee for whelk authorisations in order to offset fishery administration and stock assessment survey costs, particularly given the ongoing need to maintain the scientific evidence base in order to responsively and flexibly manage the fishery with a view to achieving sustainability in the longer term.

*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:*

Natural Resources Wales is content for this response to be made public.