



The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Keep Northern Ireland Beautiful, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust, Causeway Coast & Glens Heritage Trust and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to: [Consultation on the Review of Unlicensed Fishing for Crabs and Lobsters](#)

Submitted: 17th December 2025

NIMTF thanks DAERA for the opportunity to respond to the review of unlicensed fishing for crabs and lobsters. This is timely given the development of the fisheries management plans (FMPs) and to ensure that there are adequate provisions in place to safeguard commercial species where gaps in policies have been identified. NIMTF outlines the responses to the questions with relevant actions to ensure the sustainability of wild populations alongside commercial and recreational interests from fishers.

1. Do you support the introduction of a registration process for unlicensed crab and lobster fishers to apply for a permit?

Yes

Please provide details why you would / would not support this proposal.

NIMTF are in support of this proposal given that the evidence-base in developing the Non-Quota Species (NQS) FMP where we queried the reliability and accuracy of the data being collected by AFBI on the current levels of stocks for Brown Crab, Velvet Crab and European Lobsters. It was highlighted through the *Unlicensed Fishing for Crabs and Lobsters Regulations (Northern Ireland) 2008 (the 2008 Regulations)*¹ that there is potential for underrepresentation of the recorded abundance and frequency of crabs and lobsters being collected by recreational fishers given the existing legislation permits 5 crabs and 1 lobster to be removed daily per fisher. As it stands, it is unknown how many recreational fishers are currently taking advantage of this opportunity, or how many commercial fishers might be taking advantage of this - this is expanded on in Questions 3 and 4.

¹ <https://www.legislation.gov.uk/nisr/2008/185/made>

² <https://keepnorthernirelandbeautiful.knib.app/keepnorthernirelandbeautiful/documents/009661.pdf>

³ <https://keepnorthernirelandbeautiful.knib.app/keepnorthernirelandbeautiful/documents/009659.pdf>

⁴ Stevens, B.G., 2021. The ups and downs of traps: environmental impacts, entanglement, mitigation, and the future of trap fishing for crustaceans and fish. ICES Journal of Marine Science 78, 584–596.

⁵ Cerbule, K., Herrmann, B., Grimaldo, E., Brinkhof, J., Sistiaga, M., Larsen, R.B., Bak-Jensen, Z., 2023. Ghost fishing efficiency by lost, abandoned or discarded pots in snow crab (*Chionoecetes opilio*) fishery. Mar Pollut Bull 193, 115249.

A permit ensures the requirement for catches to be recorded, leading to greater compliance based on the existing registration system. Whilst this requires additional support and administration from DAERA, given existing enforcement challenges, NIMTF would welcome the potential opportunity to improve the accuracy of data associated in particular with crabs. However, this must be done in conjunction with recreational fishers to ensure that they do not feel they are being penalised to ensure that data is being gathered in this process.

Action: DAERA to implement a permit scheme for crabs and lobsters which would increase data robustness, precision and accuracy thus ensuring refined protections.

NIMTF would request that DAERA retains the right to prohibit the catching of both crab species (Brown Crab/Velvet Crab) and lobster within certain areas, such as MPAs in conjunction with relevant Conservation Objectives and exclusion zones as part of the Departmental 'toolkit'. This should be available if localised depletions and reductions become serious, given the existing advice which is outlined in Question 3. This would also be beneficial in terms of addressing potential conflicts with other marine users.

Action: DAERA to retain the right to prohibit the catching of crab and lobsters within certain areas, as deemed necessary in the event of localised declines as part of a wider 'toolkit' of management measures.

2. Do you support the introduction of a pot tagging system to distinguish between pots deployed by recreational and commercial fishers?

Yes

Please provide details why you would / would not support this proposal.

This will provide greater clarity between recreational and commercial fishers, especially if there is no proper standardised tagging system currently in place across all fishers. Without a consistent, robust tagging system in place to allow distinction between the two types of fishers, there is the potential for conflict between marine users. At present, anything can be used as a tag for potters as long as it meets requirements as outlined further in this response to Question 2, but can create long-term issues if any such tags were to detach, contributing to marine litter. Fishing gear has been highlighted within Keep NI Beautiful's Marine Litter Surveys 2023, where "tangles - fishing nets/rope/cord/string" was 2nd out of the top 10 findings; with 343 items found on a 1km stretch of beach², whereas 2024 showed a decrease to 7th out of 10; with 145 items found on a 1km stretch of beach³. Ghost fishing by pots/creels can put significant pressure on both the ecology of an ecosystem (Stevens, 2021)⁴ and the economic capacity of fisheries by continuing to fish target species and bycatch species (Cerbule *et al.*, 2023⁵, 2025⁶; DelBene *et al.*, 2019⁷). Marine Litter itself has been highlighted as a failing indicator⁸ of the UK Marine Strategy⁹, which has consistently failed to be achieved since the 2018 assessment¹⁰. Northern Ireland is developing a Plastic Pollution Plan¹¹, which focuses on the elimination and reduction of plastic items which cannot be recycled, which NIMTF

provided a response to and there should be alignment¹². This will jointly tackle marine litter and mitigate potential conflict amongst marine users.

Action: DAERA to introduce a robust, standardised pot tagging system to distinguish between recreational and commercial fishers to reduce conflict and reduce/eliminate marine litter occurrences.

Section 6 “Marking of pots” of the current legislations sets out the specific requirements as outlined below:

- Legible and indelible
- Name of the vessel / name of the owner
- Marker buoy / Similar floating object

The current system enables increased potential for confusion and contribution to marine litter if a recreational fisher does not follow the “legible and indelible” component of current requirements. There are inherent risks that without appropriate marking of pots, recreational fishers risk losing their gear if conflicts occur with other marine users, leading to the potential of entanglement if not appropriately marked or lit to be visible both day and night, as recommended by the Royal Yachting Association (RYA)¹³. An effective tagging system, such as Radio Frequency Identification Tags (RFID) may be a consideration for DAERA in addressing the standardised tagging system. This would delineate commercial and recreational pots, but also aid track and trace of ghost fishing gear if appropriate. This technology is likely best used in its ‘active’ form rather than its ‘passive’ form when considering ghost fishing gear and marine entanglement, as active tags have much higher detection ranges (He and Suuronen, 2018)¹⁴ and multiple types of tags can be applied to different parts of fishing gear - e.g. pots vs buoys to maximise efficacy, which has been achieved successfully in Polish studies (Szulc *et al.*, 2015)¹⁵. At present, there are no records for Northern Ireland, however this could be due to a lack of awareness of the available website to report incidents, or poorly marked static gear being present to date.

Action: DAERA to improve and raise awareness of available resources to marine users regarding potential entanglement hotspots.

Action: DAERA to assess effective potential tagging systems, including application systems (pots vs buoys) to enable track and trace alongside delineating between commercial and recreational fishers.

6 Cerbule, K., Larsen, R.B., Rijkure, A., 2025. Pot losses and associated implications in Barents sea snow crab fishery. *Sci Rep* 15, 14961.

7 DelBene, J.A., Bilkovic, D.M., Scheld, A.M., 2019. Examining derelict pot impacts on harvest in a commercial blue crab *Callinectes sapidus* fishery. *Mar Pollut Bull* 139, 150–156.

8 <https://moat.cefas.co.uk/pressures-from-human-activities/marine-litter/>

9 <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status/>

10

<https://moat.cefas.co.uk/previous-assessments/2018-assessment/summary-of-progress-towards-good-environmental-status/>

11 <https://www.daera-ni.gov.uk/consultations/public-consultation-plastic-pollution-plan-northern-ireland>

3. Do you support the requirement for recreational fishers to submit catch records?

Yes

Please provide details why you would / would not support this proposal.

As highlighted in Question 1, NIMTF are in support of recreational fishers submitting catch records. A report by ICES highlights that Brown Crabs are currently facing an exacerbated decline in wild populations, entitled “An Overview of the Brown Crab (*Cancer pagurus*) fisheries and stock trends in the Northeast Atlantic”¹⁶. This therefore needs to be addressed through a robust monitoring programme, as part of the developing FMPs, where gaps in current knowledge have been acknowledged, including the potential underrepresentation of landings from both recreational and commercial fisheries. In addition to annual ICES TAC advice, AFBI also provides annual species-specific advice sheets to fisheries to advise them further on the science behind the potential changes in quotas. Below in Table 1, AFBI has recommended consistently reduced quotas from 2021 to present for Brown Crabs, whilst the Marine Conservation Society’s Good Fish Guide section of Brown Crabs, highlights concern for both the stock status and current levels of management in relation to fishing pressure¹⁷. Table 1 also shows an overall reduction in quotas also seen for Velvet Crabs and a reduced increase for Lobsters.

Table 1. AFBI Annual Percentage (%) Change in Quota from Advice Sheets for Crabs and Lobsters

	2021/2022	2023	2024	2025	2026 (AFBI, pers. corres.)
Brown Crab	-48.4% ¹⁸	-50.4% ¹⁹	-41.9% ²⁰	-31.6% ²¹	-43% (AFBI, pers. corres.)
Velvet Crab	+22% ²²	5.4% ²³	-3.5% ²⁴	-20% ²⁵	-30% (AFBI, pers. corres.)
Lobster	-18% ²⁶	1.65% ²⁷	-4.7% ²⁸	7.7% ²⁹	-4.3% (AFBI, pers. corres.)

The implementation of a permit requiring recreational fishers to submit catch records would ensure greater compliance, meet objectives of FMPs and improve the accuracy and precision of data. Given the level of AFBI’s recommended reduced quotas (Table 1) it is recommended that recreational fishers also should be submitting location records of catch to further improve the accuracy and precision of available data, as outlined further in Question 3. NIMTF respects concerns that fishers wish to maintain confidentiality regarding their local fishing area, however this information should be made available to DAERA to better understand where catches are coming from and improve data accuracy.

¹² <https://nimtf.org/wp-content/uploads/2025/10/plastic-pollution-plan-nimtf-response.pdf>

¹³ <https://www.rya.org.uk/water-safety/boat-safety-and-maintenance/fishing-gear-entanglements/>

At present there is no standardised quantification of recreational potting activity in Northern Ireland, it would be scientifically, ecologically and economically pertinent to gather information on this activity, but also in understanding the impact on bycatch by recreational fisheries to better quantify impacts, especially in sensitive areas such as MPAs. Studies within the UK highlight this issue, e.g. (Rees *et al.*, 2021)³⁰ which necessitates best practices and sustainable fishing across a fishery (and by extension, recreational fishers), to the benefit of both fisheries and conservation objectives.

Action: DAERA to include examples of best practice within MPAs for sustainable fisheries across both commercial and recreational fishers which incorporate low-impact methodologies which address data gaps.

As highlighted in Question 1, this supports evidence-based management where localised declines of crabs and/or lobsters are found. This would benefit the development of a Harvest Control Strategy, as part of the FMP process for the NQS FMP. If adopted, this has the potential to also benefit the Intertidal Hand-Gathering of Shellfish FMP which is also in development by DAERA.

Action: DAERA to implement a permit scheme which requires submission of catch records linked to location to improve data accuracy and precision.

Action: DAERA to link catch records to the development of a Harvest Control Strategy as part of the NQS FMP and Intertidal Hand-Gathering of Shellfish FMP as necessary.

4. Are there alternative approaches to gathering data on recreational potting that should be considered to enable more complete stock assessments to be conducted?

NIMTF propose that DAERA discuss with AFBI to see if there are any additional data gaps in compiling complete annual stock assessments. NIMTF have highlighted and proposed addressing a gap in the standardised quantification of recreational potting activity in Northern Ireland in Question 3, given that the study by Rees *et al.*, (2021)³⁰ utilises techniques and methods which could be easily adopted by DAERA to apply to pot fishing monitoring based on the similarity. The findings of this study could act as a foundation so that DAERA is not starting from a blank slate and boost addressing data gaps highlighted by AFBI.

14 He, P., Suuronen, P., 2018. Technologies for the marking of fishing gear to identify gear components entangled on marine animals and to reduce abandoned, lost or otherwise discarded fishing gear. *Mar Pollut Bull* 129, 253–261.

15 Szulc, M., Kasperek, S., Gruszka, P., Pieckiel, P., Grabia, M., Markowski, T., 2015. Removal of derelict fishing gear, lost or discarded by fishermen in the Baltic Sea - Final project report.

16 <https://archimer.ifremer.fr/doc/00983/109492/123155.pdf>

17 <https://www.mcsuk.org/goodfishguide/ratings/wild-capture/1048/>

18 https://www.afbini.gov.uk/files/afbini/publications/Brown%20crab%20advice%20sheet%202021_22.v2pdf.pdf

19 <https://www.afbini.gov.uk/files/afbini/publications/Brown%20crab%20advice%202023.pdf>

20 <https://www.afbini.gov.uk/files/afbini/publications/Brown%20crab%20advice%202024.pdf>

21 <https://www.afbini.gov.uk/files/afbini/publications/Brown%20crab%20advice%202025.pdf>

22 https://www.afbini.gov.uk/files/afbini/publications/Velvet%20Crab%20Advice%20Sheet%202021_22.pdf

23 <https://www.afbini.gov.uk/files/afbini/publications/Velvet%20Crab%20advice%202023.pdf>

24 <https://www.afbini.gov.uk/files/afbini/publications/Velvet%20Crab%20advice%202024.pdf>

NIMTF would also suggest that DAERA approach the Marine Biodiversity Data Portal NI for feedback regarding bycatch^{31,32}. At present, if potential numbers of crabs and lobsters are not being reported through the licence permit scheme, then there is further potential for under-reporting of bycatch such as wrasse species which can then be sold onto salmon aquaculture farms in Scotland. One case found that across 38 cases^{33,34} involving farms of MOWI³⁵ (previously named Marine Harvest), Scottish Sea Farms, The Scottish Salmon Company, Kames Fish Farming and Loch Duart that there was a 15% mortality rate³⁶ (as a result of 3.33k dead cleaner fish being recorded) against 2.15 million being held on aquaculture farms. However, a study investigating mortality rates in Norwegian fish farms suggests that the mortality rate might be higher, near 40%³⁷.

Action: DAERA to discuss with AFBI any outstanding data gaps relating to the AFBI Annual Stock Assessments.

Action: DAERA to explore and implement relevant and effective techniques and measures as highlighted in the Rees *et al.* (2021) study to monitor pot fishing.

Action: DAERA to discuss with Marine Biodiversity Data Portal NI for further information relating to bycatch from potting associated with aquaculture farms.

A report by the Marine Conservation Society in 2021 highlights that ‘no known research has been undertaken to date on the scale of the wrasse fishery or the impact of wrasse fishing in Northern Ireland, on local wrasse populations³⁸.’ Additionally, it highlights under Table 3 the “Summary of cleaner fish management measures in the United Kingdom”, that for wrasse species only Scotland (mandatory measures) and England (voluntary and mandatory measures) have the following management measures in place:

- Minimum and Maximum Landing Size(s)
- Effort controls
- Gear restrictions
- Closed areas
- Closed seasons
- Monitoring of fishery

Lessons should be taken forward from Scotland and England to assess whether the above measures have been appropriate to reduce and regulate wrasse bycatch, and if so, should be adopted into DAERA’s ‘toolkit’ alongside the permit scheme.

Action: DAERA should assess if management measures of the Scottish and English wrasse fisheries have been effective and if so, adopted into the NQS FMP to reduce bycatch.

25 <https://www.afbini.gov.uk/files/afbini/publications/Velvet%20Crab%20advice%202025.pdf>

26 https://www.afbini.gov.uk/files/afbini/publications/Lobster%20advice%20sheet%202021_22.pdf

27 <https://www.afbini.gov.uk/files/afbini/publications/Lobster%20advice%202023.pdf>

28 <https://www.afbini.gov.uk/files/afbini/publications/Lobster%20advice%202024.pdf>

29 <https://www.afbini.gov.uk/files/afbini/publications/Lobster%20advice%202025.pdf>

By implementing a permit scheme, it would ensure that all catches would be able to be checked and reported on to ensure effective compliance. The introduction of I-VMS and Remote Electronic Monitoring (REM) would also support effective compliance and enforcement being carried out. It is important to understand that the implementation of management measures must be applied across both commercial and recreational fishers for any measure to be effective and to prevent conflict amongst marine users.

Action: DAERA to address the current gaps in I-VMS and assess challenges in REM alongside implementation of a permit scheme for commercial and recreational fishers.

NIMTF thanks DAERA for the opportunity to respond to this consultation to address unlicensed fishing for crabs and lobsters across both commercial and recreational fishers. It is important that one is not favoured over the other as we seek to address data gaps through the above, outlined work.

For further information, please contact the NIMTF Officer, Robert Walsh on robert.walsh@nimtf.org.

30 Rees, A., Sheehan, E. V., Attrill, M.J., 2021. Optimal fishing effort benefits fisheries and conservation. Sci Rep 11, 3784.

31 <https://www2.habitas.org.uk/marbiop-ni/index.php>

32 <https://www.qub.ac.uk/research-centres/QueensUniversityMarineLaboratory/research/MarineBiodiversityDataPortal/>

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<https://www.gov.scot/binaries/content/documents/govscot/publications/foi-eir-release/2025/01-d/foi-202400444416/documents/eir-202400444416---information-released---annex/eir-202400444416---information-released---annex/govscot%3Adocument/EIR%2B202400444416%2B-%2BInformation%2Breleased%2B-%2BAnnex.pdf>

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<https://www.parliament.scot/-/media/files/committees/rural-affairs-and-islands-committee/correspondence/2024/salmon-farming-ccn-11-november-2024.pdf> (Page 11)

35 <https://www.sciencedirect.com/science/article/pii/S0044848619332600>

36 <https://flyfishing-and-flytying.co.uk/salmon-farming-ban-for-cleaner-fish/>

37

<https://www.sciencenorway.no/animal-welfare-fish-farming-salmon-industry/every-year-50-million-cleaner-fish-die-in-norwegian-fish-farms/1631228>

38 https://media.mcsuk.org/documents/Use_Of_Cleaner_Fish_in_UK_Aquaculture-2021_bSTJrMB.pdf