

Date: 28/02/2019  
Our ref: 274488  
Your ref: Version 4 December 2018



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## BY EMAIL ONLY

Dear Sarah,

### INFORMAL

**Re: Fisheries in EMS Habitats Regulations Assessment for Lundy SAC UK0013114**  
**Fishing Activity: Towed demersal vs sandbanks which are slightly covered by sea water all the time, subtidal coarse sediment and subtidal sand**

Natural England has reviewed the revised HRA for Lundy SAC UK0013114 Fishing Activity: Towed demersal vs sandbanks which are slightly covered by sea water all the time, subtidal coarse sediment and subtidal sand and the associated monitoring and control plan. Natural England would like to provide the following informal comments.

#### Summary of previous advice from NE

In November 2016 Natural England advised that the conclusion made in the HRA by the D&S IFCA was subject to a high degree of uncertainty. In order to deal with this uncertainty, we advised that a monitoring and control plan be introduced by the IFCA as a part of the HRA. This plan will play a key role in the delivery of adaptive management in order to satisfy the requirements of the HRA.

iVMS would provide exposure information on % of site / feature exposed, and how much it's exposed on multiple occasions and once exposure is better understood, that may allow conclusions to be reached with more certainty. If sufficient uncertainty still remains, the next step might require the collection of field data within Lundy SAC to directly measure the impact the trawling is having on seabed communities.

Due to the lack of information available on exposure to trawling Natural England did not agree that the HRA adequately demonstrated that the current level of activity was necessarily below a level that would not result in diminished biodiversity or affect ecosystem function with any degree of certainty.

Natural England advised that a better understanding of the degree to which the seabed is exposed to multiple passes of trawl gear during the season is required before a firm conclusion on whether the activity is having an adverse effect on the integrity of the site can be reached. A better understanding of exposure also requires more clarity on the gear being used (e.g. trawl width) and could be aided by considering the impact of individual gear components which may penetrate to different levels within the seabed.

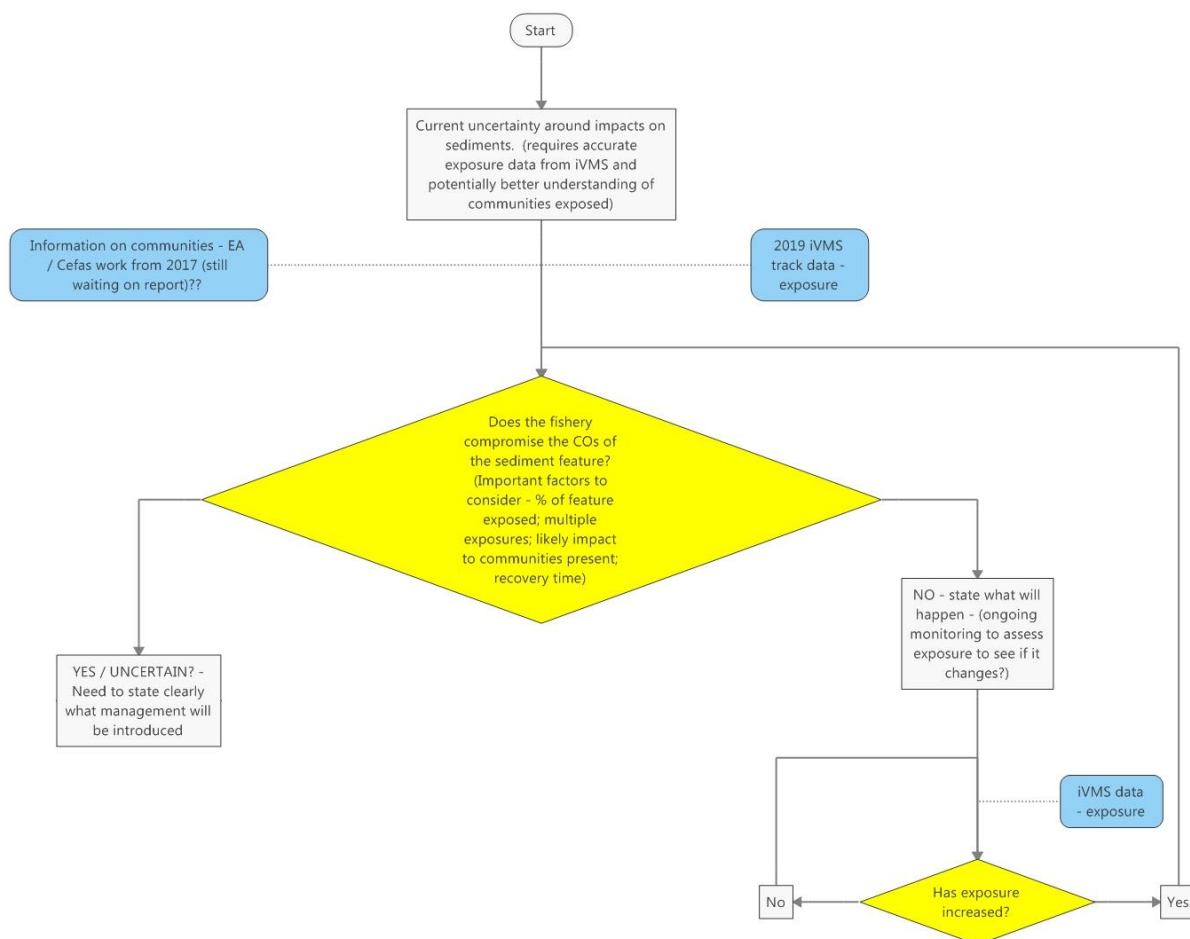
#### Monitoring and control plan

A monitoring and control plan should identify monitoring requirements and the management actions (see note attached '*NE Staff Guidance Note: Monitoring & Control Plans and their Role in Adaptive Risk Management*'.) and should include:

- Set out (with time scales) the monitoring that will be undertaken
- Set out clearly how the data obtained will be used to make decisions on management (with time scales if possible)
- Specified management actions need to be identified, initiated by clear triggers or decision points

The proposed plan suggests that the effort data collected through iVMS will be used to establish a baseline and that D&S IFCA will monitor if this level changes (section 3.1). A trigger point of five vessels has been set and the effort for each vessel will be obtained and this will form the baseline (section 4.1). This makes the assumption that the current level of activity is not having an adverse impact on the habitat. Natural England does not agree that the current level of activity has been adequately demonstrated to be below a level that will not result in a diminished biodiversity or effect on the ecosystem function with any degree of certainty. We need to see clearly set out how this exposure data will inform whether the exposure is at an acceptable level or not and whatever the data shows, it should be clear what management action will result.

It may be helpful to set this out in a flowchart; an example is given in Figure 1.



**Figure 1: Example flowchart**

Any new habitat characterisation data (i.e. the data collected by the EA which is being reported by Cefas) should be used where possible in conjunction with the iVMS tracks to inform a judgement on whether the current fishing effort levels are acceptable or not, not just when fishing effort occurs at a high level (section 3.2 and 4.2).

Section 4.2 sets out that work would be done in partnership with Natural England that might involve joint survey work to assess changes against baseline habitat characterisation data if a large increase in fishing effort has been identified. Natural England cannot guarantee financial future contributions to survey work.

If you would like to have a face to face meeting to discuss the development of the monitoring and control plan then please contact us to arrange a date.

Please do not hesitate to contact me if you have any questions or require further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ruth Porter', enclosed within a light grey rectangular border.

Ruth Porter

Marine Lead Adviser  
Natural England

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