

Consultation Response Form on the proposed Crab and Lobster Fisheries Management Plan (FMP)

Personal details and confidentiality

1 Would you like your response to be confidential?

No

Confidentiality and data protection information

A summary of responses to this consultation will be published on the Government website at: www.gov.uk/defra <<http://www.gov.uk/defra>> . An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.

Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details(e.g., home address, email address, etc).

If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

Consultation Response Form on the proposed Crab and Lobster FMP

If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts.

This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

This consultation is being conducted in line with the Cabinet Office "Consultation Principles" and be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance> <<https://www.gov.uk/government/publications/consultation-principlesguidance>> .

Please find our latest privacy notice uploaded as a related document alongside our consultation document.

If you have any comments or complaints about the consultation process, please address them to: consultation.coordinator@defra.gov.uk

What is your name?

Name: Sarah Clark

What is your email address?

Email : s.clark@devonandsevernifca.gov.uk

What is your organisation?

Organisation : Devon and Severn Inshore Fisheries and Conservation Authority

Which of the following best describes your interest in the Crab and Lobster FMP?

(Required)

- Other

If 'other', please specify

D&S IFCA has statutory duties under Ss.153 and 154 MaCAA 2009:

153 Management of inshore fisheries

(1) The authority for an IFC district must manage the exploitation of sea fisheries resources in that district.

(2) In performing its duty under subsection (1), the authority for an IFC district must—

Consultation Response Form on the proposed Crab and Lobster FMP

- (a) seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way,
- (b) seek to balance the social and economic benefits of exploiting the sea fisheries resources of the district with the need to protect the marine environment from, or promote its recovery from, the effects of such exploitation,
- (c) take any other steps which in the authority's opinion are necessary or expedient for the purpose of making a contribution to the achievement of sustainable development, and
- (d) seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district.

154 Protection of marine conservation zones

- (1) The authority for an IFC district must seek to ensure that the conservation objectives of any MCZ in the district are furthered.

IFCAs manage the inshore fisheries and marine environment that may be impacted by them. D&S IFCA also in order to exercise its powers under SS 155 and 156 MaCAA to make byelaws and monitor compliance and undertake enforcement of these byelaws. D&S IFCA is also a relevant and appropriate Authority in other legislation such as Habitats Regulations, Fisheries Act; Environment Act, Wildlife and Countryside Act (as amended), Marine strategy Regulations. Of particular relevance to the FMPs are the Fisheries Act and the Joint Fisheries Statement where IFCAs must have regard to the objectives set out in the Act.

Questions on the Crab and Lobster FMP

The following questions relate to the Crab and Lobster Fisheries Management Plan (FMP) which can be found in the 'related documents' section on the home page.

1 Do you have any comments on the process for developing the Crab and Lobster FMP?

Details can be found in the **Executive Summary**, **Foreword**, **Context**, and **Scope of the Crab and Lobster FMP** sections of the FMP, and **Annex 3: Stakeholder Engagement**.

- [Yes](#)

If yes, please leave your comments here.

IFCAs were not initially invited to sit on the frontrunner FMPS (crab & lobster, whelk and scallop) even though they have years of experience and expertise in managing these fisheries and knowledge of the inshore fleets. D&S IFCA was the only IFCA to get involved at the early stages of the Crab & Lobster FMP. This was due to D&S IFCA's Deputy Chief Officer finding out second hand that a meeting was planned and told outright by an industry member that IFCAs were not invited to attend. This led to her contacting Seafish and requesting to a seat on the CMG. Attendance at other front runner FMPS was remedied for the through liaison with the FMP groups through the AIFCA but this was sometime later after the AIFCA joined the Programme Board, by which time the FMP group had been running for some time, many wheels were in motion and draft FMPS had developed quite considerably by then. This was a failure of FMP process not to have the IFCAs, as key inshore regulators, on the FMP management groups from the outset. For future FMP development a really good cross sections of the interests in the species should be invited at the start of the process.

As part of the CMG D&S IFCA spoke out about the inshore fleet and raised issues relating to them. The inshore matters on occasion took a back seat to the bigger business interests in the discussions. Most of the larger businesses had representation on the group which was not the case for the inshore fleet. As stated in the draft FMP and Annex 3 the CMG is an industry led group. However, the CMG is largely made up of the large crabbing fleet owners or their representatives and whilst two inshore Fishermen's association in the SW spoke out the inshore fisheries concerns were not wholly incorporated into the Plan. Also, the timing of meetings did not concur with the ability for fishermen rather than company owners to attend.

IFCAs are knowledgeable about the inshore shellfish fleet and understand the economic, social, cultural and heritage importance, to both the small and large ports and their communities in their Districts. IFCAs are also able to sense check the data used in the Evidence summary due to their knowledge of these fisheries.

It is therefore important for IFCAs to be involved in all relevant future FMP development as it is clear that mistakes have been made in the front runners in terms of what the membership should be and developing a formula for stakeholder involvement would be a key step forward.

It is encouraging in the Crab & Lobster FMP that stakeholder recognised that one size fits all approach to management is not appropriate for a fishery characterised by local fleet variation. Currently much of the existing management lies on the inshore fleet where IFCA's have introduced measures to try and support the sustainability of the stock compared to measures outside the 6nm. Whilst measures might not be transferable across local or regional boundaries there are some measure that could benefit the stock overall such as increase in MCRS for crawfish, lobster and crab. In the stakeholder meetings some of these measures were key points of discussions – on the disparity of measures on the inshore fleet whilst the fleet outside the 6nm have fewer restrictions. Throughout the FMP process little discussion was had on the effort on stock particularly in the north sea and western channel exerted by the vivier potting vessels many of which are under 15m but compared to a similar sized inshore vessel is of completely different design and efficiency. One area which was not addressed in the plan is the how the landings data is allocated to the different métiers of the fleet. This should be broken down further to differentiate in more detail the 12-15m vessels to split into those that have vivier tanks and can fish for days at a time landing up to 20 tonnes of crab compared to a similar size inshore vessel that does not have the same construction and facilities.

A concern that D&S IFCA would like to raise regarding the FMP consultation process is the amount of documentation included in the consultation. With all of the Tranche 1 FMP consultations, there is a multitude of documents to review to be fully informed of the objectives of the plans, proposals for management and research requirements. Each FMP consultation consists of the FMP itself; multiple annexes detailing evidence analysed, communications undertaken, and research planned; a Strategic Environmental Assessment and a De-minimis Impact Assessment. Many of these documents are over 100 pages in length. Whilst the summaries are useful, in order to be informed of all the evidence used and research planned to inform the FMP consultation, review of all documents is necessary, and this takes a great deal of time and effort. Consulting on all six front runner FMPs at the same time is not satisfactory. It would have been more accommodating to stagger the consultations over time to allow stakeholders an opportunity to review each one rather than having to respond to six by the same date. Officers believe that the current process makes it difficult for many stakeholders to successfully engage in the FMP process.

2 What are your views on the evidence presented on the current state of crab and lobster stocks (and other related stocks) in English waters and can you provide any additional evidence that supports or differs from Defra's view.

Details can be found in the **Scope of the Crab and Lobster FMP and Status of the English Crab and Lobster Fisheries** section of the FMP and **Annex 1: Evidence Statement**.

The heritage value of crab and lobster fisheries are not mentioned in the Executive summary only employment and recreational interest. As fisheries sustainability includes environmental, social and economic sustainability some emphasis on social aspects such as heritage, community and associated businesses and families within those communities is vital.

It mentions that the same biological stock may be subject to different management restrictions, but this is only with reference to crab and lobster – many fisheries experience the same issues. IFCA

were created under the MaCAA to be local managers of fisheries and the marine environment in their districts.

The Draft FMP has numerous annexes associated with it which includes the Crab and Lobster FMP Evidence Statement Annex 1. The data used within this include landings of different segments of the fleet. This is welcomed but the data used to date does not identify those vessel that are 'day boats' and those that are viviers vessels which operate for many days at sea and deploy greater numbers of pots than day boats. Many of these vessels are under 15m and therefore included in the data for the 12-15m sector. D&S IFCA welcomes points made in the FMP that greater evidence will be gathered to differentiate these vessels from day boats so that their effort on the stock can be assessed.

Economic data have been included in the Evidence Statement Annex 1. The data suggest that the prices for crab in any 12-month period between 2016 and 2021 fluctuated by £500/tonne in some years, and over £1,000/tonne in others. From D&S IFCA's understanding of prices per kilo of crab landed for human consumption, this appears very low. Prices rarely go below £2.00 per kilo (£2000 per tonne) and realistically range between £2000 to £3000 per tonne over this time period with cock crab reaching higher values. From MMO landings data into Devon ports from 2016 -2021, the price per kilo of crab for the under 10m vessels range from £1.55 to £3.17 and between £2.05 to £3.66 for the 10m and over vessels. The disparity between national landings value and Devon landings value implies that large quantities are being landing at a lower value, which is likely to be used as whelk bait and brings down the average price per kilo of crab.

D&S IFCA officers have submitted comments on previous drafts of the plan some of which have been included in the final plan whilst others have been omitted. One area within the Annex 1 Table 8 Crab and Lobster Evidence Statement details the MMO data on landings and value. D&S IFCA has pointed out to the CMG that landings into Dartmouth, Kingswear and the River Dart should be amalgamated and not listed as separate ports as there is not a recognised difference between these places of landings. Currently Salcombe lies 4th in the highest landings and value of brown crab (656 tonnes and £2.2 million respectively) in England and those landings into the Dart (amalgamated) would be the 5th largest in port in terms of value for crab (£1.6 million). This shows the significance of brown crab landings into Devon ports and the importance to the fishing industry and associate businesses.

3 What are your views on the evidence gaps identified within the FMP?

Details can be found in the **Scope of the Crab and Lobster FMP and Status of the English Crab and Lobster Fisheries** section of the FMP, **Annex 1: Evidence Statement** and **Annex 2: Evidence and Research Plan**.

D&S IFCA welcomes the reference, within the FMP and Evidence and Research Plan (Annex 2), to the use of REM and AI for gathering data on catch composition as part of fishery dependent data collection.

Under FMP Objective 4 of the Evidence and Research Plan there is reference to the research needs of reviewing the available evidence of how other fisheries impact crab and lobster stocks. This too is welcomed as there have been reported impacts of scallop dredge vessels on the crab stocks within Western Channel; those vessels having been displaced from further east along the Channel due to seasonal closures to protect spawning stock. The displacement has created unintended impacts which D&S IFCA has raised in their recent consultation response on the proposal for seasonal scallop

closures in ICES areas 7d and inshore 7e in the Channel. Proper assessment of the impacts of these and other fisheries on crab migration and stocks is essential.

4 Do you agree with the actions to address the evidence gaps identified? Please provide information to support your view.

Details can be found in the **Scope of the Crab and Lobster FMP, Status of the English Crab and Lobster Fisheries, Shared Shellfish Principles, Crab and Lobster Fishery Management Objectives** and **Future Fisheries Management Strategy** sections of the FMP, Further details can be found in **Annex 2: Evidence and Research Plan**.

- No

D&S IFCA believes another key area that needs addressing within the evidence gathering is the impact of more efficient viviers vessels' effort on stocks and also the impact of other activities such as capital dredging on the migration of female brown crab from east to west along the Channel. Also, worth investigation is whether there is any link between the amount of effort in the southern North Sea, Eastern Channel and further along the Western Channel on crab movement and stocks, and consideration of environmental fluctuations such as the North Atlantic Multidecadal oscillation on crab populations. These are not mentioned in the FMP, Evidence Statement or Research Plan.

Also, it would be useful to understand the changes in the fleet between fishing methods which have been raised. For example, many of the traditional crabbing vessels particularly the viviers have shifted effort away from crab to lobster due to lower landings of crab/LPUE and also a movement by these vessels from potting to netting to target crawfish due to decline in crab catches. It would be useful to assess these changes within that fleet.

5 Do you agree with how the proposed measures have been prioritised?

Details can be found in the **Future Fisheries Management Strategy** section of the FMP.

- No

If no, please provide comments below.

D&S IFCA agrees that the proposed increases in MLS for lobster and crawfish should be prioritised. The proposal for an increase in MLS for both these species nationally would deliver harmony with the existing management measures already in place in D&S IFCA's District and allays concerns of the inshore fishing industry regarding the different management measures relating to MLS inside and outside 6nm boundary. For crawfish there is strong evidence and support for an increase in MLS nationally from the SW IFCA's who have already implemented this increase, the inshore fishers in these areas, the Cornish Fish Producer Organisation and follow the same measures having been introduced by Ireland and France to meet the sustainability needs of the fishery. Research has shown that females over 82mm are becoming sexually mature, that size of sexual maturity (50% mature) is between 95-10mm, and 100% are sexual mature over 110mm (Ifremer work on the Atlantic stock). Therefore, the priority to is introduce an increase in crawfish MLS to 110mm.

D&S IFCA agrees with the increase in MLS for lobster to 90mm. It appreciates that in the north east England this may have an impact on the fishers and their businesses, but perhaps a regional difference could be implemented for this measure and a phased approach to the increase over several years from 87mm to 90mm could be implemented for the fishery allowing a reduced impact over time to the fishers and their businesses.

For brown crab there may need to be regional differences in implementation due to the current differences in MLS along the north sea coast. However, there is potential to harmonise the sizes regionally across the 6nm. D&S IFCA supports an increase in the South West to mimic the MLS for female and male brown crab outside the 6nm – i.e., 150mm for females and 160mm for male brown crab across the South West region (outside the 6nm).

D&S IFCA does not agree on the action to implement measures to improve the information base on recreational crab & lobster fishing. Whilst D&S IFCA has a system in place to understand the level of recreational activity, in terms of numbers of recreational potting permit holders and the implemented catch limits, it does not have the administrative or financial resource capability to introduce of a catch return policy which support this measures of improving the information base of recreational crustacea catches. D&S IFCA does not see this intervention as a priority.

D&S IFCA believes that managing effort is key for the brown crab fishery nationally. With the increase in offshore vivier vessels that do not have effort restrictions there has been a corresponding decline in crab catches, and this has impacted the inshore crabbing fleet not only in the South West but nationally. Effort management is key whether it is through days at sea or pot limits. Pot limits are unlikely to work in the offshore areas outside the 6nm due to enforcement capability so a limit on effort through days at sea may be more appropriate. D&S IFCA welcomes further discussions on effort management.

6 What do you think are the likely positive and negative impacts (stock sustainability, environmental, economic, social) of increasing the minimum landing sizes for lobster in English waters? Please provide evidence where possible.

Details can be found in the **Future Fisheries Management Strategy** section of the FMP.

Most IFCA's have implemented a larger MLS for lobster and in particular in the South West the fishing industry have been calling for the measures to be extended across the 6nm to a national scale to harmonise with inshore measures. D&S IFCA believes that an increase to 90mm will be beneficial to all stocks around the country. In particular in the north east of England the stocks are fished heavily and above MSY, and increasing the size would meet both the precautionary objective and the sustainability objective of the Fisheries Act 2020. D&S IFCA is aware that this view might not be held by the fishing industry in the North East. Perhaps Defra could implement the increase across all other areas immediately to meet the short-term early intervention timeframe but in the North East perhaps a phased approach to the increase could be implemented which would allow fishers to adapt

and not be immediately impacted by a 3mm increase. Economic and social impacts would need to be assessed.

D&S IFCA would like to understand if this measure will apply to all vessels landing into English ports as this would be the most pertinent and acceptable measure for those fishers operating in English waters. This would follow the similar measures to those within the Lobsters and Crawfish (Prohibition of Fishing and Landing) (Amendment) (England) Order 2017.

7 What do you think are the likely positive and negative impacts (stock sustainability, environmental, economic, social) of increasing the minimum landing sizes for crawfish in English waters? Please provide evidence where possible.

Details can be found in the **Future Fisheries Management Strategy** section of the FMP.

D&S IFCA together with CIFCA and IoS IFCA have already implemented an increase in MLS to 110mm. D&S IFCA therefore supports this increase nationally. The main fishery is in the South West and with increase in catches and landings of crawfish in the South West have been identified in particular in Cornwall and Isles of Scilly this would be beneficial to stock sustainability. D&S IFCA is aware that the Cornish Fish Producers' Organisation has implemented a voluntary MLS of 110mm for all its members which also supports this measures. Further detail to support this measure are as follows and can be seen in section 5 above: For crawfish there is strong evidence and support for an increase in MLS nationally from the SW IFCA's who have already implemented this increase, the inshore fishers in these areas, the Cornish Fish Producer Organisation and follow the same measures having been introduced by Ireland and France to meet the sustainability needs of the fishery. Research has shown that females over 82mm are becoming sexually mature, that size of sexual maturity (50% mature) is between 95-10mm, and 100% are sexual mature over 110m (Ifremer work on the Atlantic stock). Therefore, the priority to is introduce an increase in crawfish MLS to 110mm.

D&S IFCA would like to understand if this measure will apply to all vessels landing into English ports as this would be the most pertinent and acceptable measure for those fishers operating in English waters. This would follow the similar measures to those within the Lobsters and Crawfish (Prohibition of Fishing and Landing) (Amendment) (England) Order 2017. D&S IFCA would support an early intervention for an increase to the MLS of crawfish to 110mm under a Fishing Vessel Licence Condition as of immediate effect (or at least 1st January 2024) whilst a Statutory Instrument is developed for this measure.

8 What do you think are the likely positive and negative impacts (stock sustainability, environmental, economic, social) of prohibiting the landings of soft brown crab for bait?

Details can be found in the **Future Fisheries Management Strategy** section of the FMP.

Consultation Response Form on the proposed Crab and Lobster FMP

During the development of the draft FMP D&S IFCA participated in the management and science groups and pushed for this measure to be included as an early intervention in the life of the plan. D&S IFCA welcomes and supports the inclusion of the short-term intervention of prohibiting the landing of soft-shelled crab as bait and would support going a step further and suggest a prohibition of the use of crab (soft or hard shelled), per se, for bait. D&S IFCA's permit conditions already prohibit the use of edible crab as bait whilst fishing for edible crab, lobster, and spider crab. D&S IFCA believes that this measure will benefit stock sustainability and encourage fishers to land the best quality crab rather than keep all the sizeable crab caught so the poor-quality soft-shelled crab can be used as bait even though a much lower price is attained for this crab. Landing only good quality crab will also benefit the fishers' economically due to the increased quality and weight of meat in the crab.

D&S IFCA is part of a Fishing Industry Science Partnership funded project, together with Bangor University, Seafish and South Devon and Channel Shellfishermen, which is developing a methodology to measure the hardness of the shell of brown crab using a durometer (used by North American crustacean fisheries). If successful this methodology would be used to enforce the change in legislation required to introduce this early intervention. The research work has started this summer and a Research Assistant will be employed by the project to aid D&S IFCA officers in this work.

The inability to land soft-shelled crab will temporarily impact the whelk fishing industry in particular economically but fishers should be able to seek waste from the processing factories, and work with them to provide the waste in an appropriate form, and also look for alternative sources of bait. This in turn may drive innovation for the whelk fishery.

9 What considerations, such as interactions with existing management measures for these species, need to be taken into account whilst developing the proposed initial measures?

Details can be found in the **Future Fisheries Management Strategy** section of the FMP and **Section 14 of Annex 1: Evidence Statement**.

Comments on considerations to be taken into account whilst developing the proposed initial measures.

10 Are there other technical measures or variations of the proposed measures that we should consider to restore and protect the crab and lobster stock in English waters and the wider ecosystem on which they depend, and why?

Details can be found in the **Future Fisheries Management Strategy** section of the FMP.

- Yes

Consultation Response Form on the proposed Crab and Lobster FMP

D&S IFCA, whilst understanding the 3-S approach, is concerned about the inclusion of the Western English Channel CFU as a pilot area without more information and evidence. Cefas Crab and Lobster stock assessments for 2022 were due to be published early this year but these have been delayed. Their publication is expected in September 2023. It would be useful to view the most up to date stock assessment for the Western Channel CFU to see if the anecdotal concerns are reflected in it.

Another important factor would be to analyse the sectors of the fleet that could be impacting stocks outside the 6nm boundary. There has been a larger increase in offshore vivier boats entering the fishery since 2015 and many operate in the Western Channel. D&S IFCA believes that there are up to 15 vivier vessels operate in the Western Channel each with approximately 5,000-6,000 pots. Much more information is required regarding this sector of the fleet and its effort on crab stocks. Details of the catches, effort, and landings per unit effort of this sector would be needed to determine the potential management measures that would aid the sustainability of the stock. Further information is required on the amount of crab that is landed from these vessels that goes to whelk bait. Anecdotal information suggests that all of the sizeable crab, no matter what the condition, is retained on these vessels, and any soft and poor-quality crab, or crab that has died in the vivier, is sold for whelk bait as it still has a value.

The South West IFCA's (D&S IFCA, CIFCA and IoS IFCA), have already introduced the largest Minimum Conservation reference Size (MCRS) for brown crab in the inshore area of England, having implemented MCRS of 150mm for females and 160mm for males. Outside of the 6nm the MLS remains at 140mm. Increases in MLS in the Western Channel to match D&S IFCA sizes would support the size aspect of the 3-S approach. D&S IFCA would like to see better harmonisation for MLS across the inside and outside 6nm limit. Whilst there may be spatial and biological stock difference in around the coast, D&S IFCA believes that in the different Crab Fishery Units that there should be harmonisation inside and outside of the 6nm boundary. If the increased MLS for brown crab is extended across the whole of the South West Crab Fishery Unit, D&S IFCA believes this would reduce the pressure on the stock and be a conservation measure for stock sustainability. This could similarly be implemented in other Crab Fishery Units depending on biological restraints. Harmonisation cross the 6nm in the different fishery units is important and will aid fishermen by simplifying the legislation and support better compliance and enforcement of measures.

In terms of season, within IFCA's District, potting seasonality is often determined by the weather with inshore vessels having limitations on going to sea in bad weather, larger groundswell, inability to leave harbours in poor conditions, challenges associated with working in spring tides, and therefore their effort is limited to a reduced number of days compared to those vessels constructed to withstand such sea conditions and poor weather. Introduction of any seasonal measure would need to look at those vessels that can withstand poor weather and sea conditions rather than apply to the inshore vessel that are already restrained by these environmental factors. Seasonal management may be more relevant to the offshore vivier vessels.

The other area of the 3-S approach is sex of crab. The Western Channel Crab Fishery, particularly inshore, is dominated by females migrating along the Channel. Any measure introduced based on restricting female catches would severely impact the inshore fishery. All the above factors, highlighted by D&S IFCA, would need to be considered in light of better evidence.

As previously mentioned D&S IFCA believes that managing effort is key to the sustainability of the brown crab fisheries across all fishery units.

With reference to the FMP goal to explore wider environmental issue and impacts of crab and lobster fisheries, D&S IFCA welcomes the inclusion of this action. D&S IFCA Officers have assessed the impacts of potting on MPA designated features as not having a significant the features or MPA site integrity, which has been supported by Natural England, and would primarily focus support on the greater understanding of the impacts of lost or abandoned gear. D&S IFCA is looking to explore funding opportunities to support the removal of 'ghost fishing gear'.

11 Are there other measures which should be prioritised for early action in line with the precautionary approach? Please provide any additional views and evidence you would like us to consider.

Details can be found in the **Future Fisheries Management Strategy** section of the FMP.

- Yes

D&S IFCA has promoted and been supportive of the measure to prohibit the landing of soft-shelled crab for use as whelk bait. D&S IFCA would propose that this goes further and prohibits the use of all brown crab for bait – both soft and hard shelled. This would be in line with the precautionary objective as well as the sustainability objective of the Fisheries Act.

D&S IFCA would also like to see further exploration of more harmonisation of crab MLS regionally across the country through further research into the reasons why the current MLS exist and whether increases can be achieved in other areas nationally.

From the recent AIFCA workshop on the Crab and lobster FMP, managing/controlling fishing effort on brown crab in particular for the offshore vessels (not day boats) was considered as a priority for early action and the evidence from landings, LPUE and fishers' personal testimony supports the decline in crab stocks. D&S IFCA awaits the up to date Cefas stock assessments to understand if this is evident from these assessments.

12 How would you like to be involved in the delivery of the FMP and the future management of the English crab and lobster fisheries?

Details can be found in **Annex 3: Stakeholder Engagement Report** and the **Implementation section of the Consultation Document**.

D&S IFCA has been involved in the SIAG, CMG, its working group and science sub-group and would like to continue this collaboration with industry, government and other stakeholders. D&S IFCA is the inshore fisheries regulator and has expertise in management of crab and lobster stocks beyond current national legislation and in the monitoring compliance of regulations. D&S IFCA's knowledge of the inshore crab and lobster fisheries is an important asset to feed into the implementation of the Plan and future management of the English crab and lobster fisheries. D&S IFCA has been able to disseminate information in relation to FMP engagement events to its Members and all its permit

holders so that those who are involved in the fishery and interested in its future can attend these events and get engaged in the process.

13 Are there any important connections with or links to other fisheries that we should consider when finalising this FMP or during its implementation process?

Defra should consider the impacts of other fisheries on the crab and lobster fishery. For example, the displacement of scallop vessels due to seasonal closures in the eastern through to western channel and inshore closures in Lyme Bay (ICES areas 7d and 7e) and the increased pressure of these vessels on areas to which they are displaced. Some of the most important crab fisheries exist in the western channel and crab fishers have reported impacts on crab stocks by the scallop vessels displaced in particular those larger vessels with many dredges aside. These impacts have been reported in the Mid Channel blocks.

Impact on crab stocks of other activities should also be considered through the Plan, in particular those that may impact the migration of crab along the Channel, such as capital dredging. Also, further information is needed on whether crab stocks are linked and how increased effort offshore in the eastern Channel, Southern North Sea and western Channel impacts the stocks overall.

D&S IFCA would like to understand changes in fleet fishing methods i.e., on how vessels are changing methods to target other species since crab stocks have shown a decline e.g., have vessels shifted away from crab to lobster to support their income and whether potters have switched to netting to target crawfish. Anecdotal evidence suggests this is happening with the offshore vivier vessels.

Questions on the Crab and Lobster FMP environmental report

The following questions relate to the Crab and Lobster FMP environmental report which can be found in the 'related documents' section on the home page.

Is there any additional evidence we could consider, to inform our environmental baseline?

Section 3 provides a summary of the current state of the UK marine environment for each of the environmental issues screened into this SEA, and where applicable their associated UK MS descriptors (Table 4).

Our assessment has been conducted against the environmental baseline set out in these sources of existing information.

D&S IFCA would like to see more information on environmental fluctuations/changes in Section 3 of the SEA. For example, consideration of the North Atlantic Multidecadal Oscillation and how these fluctuations from a positive to negative phase may impact fish stocks, in particular in this case crab

and lobster stocks. There have been observable changes in populations of certain species such as crawfish – increases in catches/sightings have been observed since 2014 and reported sightings have extended into Dorset far beyond their recognised distribution. Crawfish landing dropped dramatically in the 1970s/1980s and within 40 years their numbers have increased in the South West. Same is true of blue fin tuna which is now quite common sight for fishers operating in the South West particular towards late summer.

Are there any other positive or negative environmental effects associated with the policies and actions of the draft Crab and Lobster FMP that we could consider?

Section 5 assesses the environmental effects of the policies and actions of the draft Whelk FMP, in relation to the environmental issues screened into this SEA, and where applicable, their associated UK MS descriptors (Table 4).

Please include any other positive or negative environmental effects associated with the policies and actions of the draft FMP below.

Do you have any comments on the proposed actions set out in the Environmental Report to monitor and/or mitigate any likely significant (negative) effects on the environment of the FMPs?

Section 6 details the proposed measures for reducing significant negative environmental effects arising from the Crab and Lobster Fisheries Management Plan, for issues scoped into the assessment.

Please include any comments on the proposed actions to monitor and/or mitigate any likely significant (negative) effects on the environment of the FMPs.

Do you have any additional comments in relation to the Environmental Report which you have not been able to provide in response to the previous questions?

Please include any additional comments in relation to the Environmental Report below.

Consultee feedback on the online survey

Overall, how satisfied are you with our online consultation tool?

- *Very satisfied*
- *Satisfied*
- *Neither satisfied nor dissatisfied*
- *Dis-satisfied*
- *Very dissatisfied*
- *Don't know*

Please give us any comments you have on the tool, including suggestions on how we could improve it.