

Consultation Response Form on the proposed King Scallop Fisheries Management Plan

Personal details and confidentiality

Would you like your response to be confidential?

- No

If you answered Yes to this question, please give us your reason

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.

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.

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

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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 send them to consultation.coordinator@defra.gov.uk.

What is your name?

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What is your email address?

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What is your organisation?

Devon and Severn Inshore Fisheries and Conservation Authority

Which of the following best describes your interest in the King Scallop FMP

(Required)

Select only one item:

- 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—
 - (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 King Scallop FMP

The following questions relate to the King Scallop Fisheries Management Plan 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 King Scallop FMP

Details can be found in the **Development of the FMP** section of the FMP and **Annex 3: Stakeholder engagement** and **Annex 5: Legislative context and governance**.

- 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. 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 really good cross sections of the interests in the species should be invited at the start of the process. The Scallop FMP states, 'that it is the product of a collaboration between fisheries policy authorities, statutory environment agencies and representatives from the king scallop industry (catchers and processors) via the SICGWG', and that 'the SICGWG was established as a collaborative management group and members have been strong advocates for a co-management approach to scallop fisheries'. However, the fact that IFCAs, as the inshore regulators, who have management measures in place (beyond those applied nationally) and knowledge of the inshore scallop fisheries were not invited at the start of the process does not demonstrate a true co-management approach.

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

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Districts. IFCA's 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 IFCA's 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.

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. D&S IFCA believes that the current process makes it difficult for many stakeholders to successfully engage in the FMP process.

2 What are your views about the evidence presented on the current state of the king scallop stocks in English and Welsh waters and can you provide any other evidence which supports or differs from ours?

Details can be found in the **Current Status of the fishery** section of the FMP and **Annex 1: Evidence Statement**.

Comments and evidence.

D&S IFCA welcomes some of the research outlined in Annex 2 the FMP Evidence and Research Plan. These include the assessment of scallop meat and gonadal weight. Currently the weight of the scallop drives its value and therefore is highest when the gonads are largest, just before spawning. Research on the impact of taking scallop at this maximum gonadal weight on the reproductive potential and how this may negate the benefit of spawning seasonal closures is important and necessary.

The Research Plan reference 5.4 looks to assess the impact of scallop dredging outside MPAs on commercial fisheries populations and endangered, threatened and protected species. D&S IFCA supports this research in particular aspects relating to the impact of the large nomadic vessels in the Western and Mid-Channel on crab stocks. However, D&S IFCA is concerned that in Annex 1- the King Scallop FMP Evidence Statement- it states that 'dredging is unlikely to cause large scale mortality of bycatch species populations due to the low proportion of individual species'. It goes on to say that king scallop dredge bycatch in the English Channel was found to be low compared to other towed mobile fishing gears. This statement is based on a PhD thesis that was published in 2015. Since the publication of this research, scallop dredging vessels have increased their efficiency and many of the large vessels have 20 dredges aside or more. The Evidence Statement also highlights that brown crab is one of the dominant bycatch species and findings suggest that 15% to

53% is the proportion of bycatch species caught in dredges, with a mean of 19%. This raises concern and D&S IFCA would like to see the inclusion in the Research Plan of a specific research need to investigate the level of brown crab bycatch in scallop dredge fisheries particularly in the Western English Channel, where crab stocks are of significant importance to the potting fleet.

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

Details can be found in section the **Improving the evidence base** of the FMP executive summary and the **Management objectives for king scallop fisheries in English and Welsh waters table**. Further details can be found in **Annex 2: Evidence and Research Plan**.

Comments on evidence gaps.

As mentioned in section 2, D&S IFCA would like to see the inclusion in the Research Plan of a specific research need to investigate the level of brown crab bycatch in scallop dredge fisheries particularly in the Western English Channel.

D&S IFCA would like to have seen more detail in the Evidence Statement on the different metiers of the scallop fleet. Within the fleet characteristic and landings data of the Evidence Plan, there are figures included for only two metiers - the 10m and under fleet and the over 10m fleet. It would be useful to understand the landings of the different metiers such as the 10-12m, 12-15m, 15-18m, and over 18m vessels. It would then be clearer as to which sector is landing more, has the greatest effort on the stocks and where further management might be applicable. Currently the inshore fleet (largely under 15m) in D&S IFCA's District (and other IFCA Districts) is subject to greater management in terms of gears specification, spatial and temporal closures than the larger vessels. Under Objective 3 of the FMP, it states that there is 'Currently no regulatory barrier to growth for <10m sector and limited regulatory barrier to growth for <15m sector (despite largest expansion seen to date in 10-15m sector). There is the potential for unexpected growth from the <15m sector to undermine future management decisions'. Whilst this may be the case, the under 15m sector operating inshore is subject to further management than those operating outside the 6nm. Also, the FMP states that there has been a gradual decline in landings for the under 10m fleet since 2016. The FMP suggests, under Objective 3, that there will be consideration of appropriate regulation of the under 15m scallop sector. D&S IFCA would like to understand what measures might be considered, as there is currently appropriate management of the inshore sector by IFCAs. The FMP should detail how the management measures inside the 6nm could be used to help inform future management measures across boundaries and sectors of the fleet.

The King Scallop FMP Objective 5 discusses the action to assess the interactions with the marine environment and potential impacts associated with scallop fisheries. D&S IFCA, as well as other IFCAs, has undertaken MPA assessments of the impact of scallop dredges on features of MPAs. These include reefs, coarse, sediment, mud, sand and sea grass. There is a wealth of information available to the SICG and its members from these assessments. Included in these assessments are reviews of literature used, conclusions on the impact on features and the integrity of the sites, and Natural England's formal advice. Much can be learnt from these assessments. It is interesting to see in the Strategic Environmental Report, which accompanies the FMP as part of the consultation, that before any new management intervention of the king scallop fleet are introduced in MPAs that a test of likely significant effect and/or MPA assessment will be carried out. Under Defra's 2012 Revised

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Approach to Managing commercial fishing, scallop dredging was the most significant impact to most features of MPAs and were termed 'red risk' and had to be prohibited from MPAs or large areas within MPAs. This process was undertaken by IFCA within the 6nm. Again, lessons can be learned from the IFCA's work, and help support the achievement of the targets for MPA condition set out in the Environmental Targets (MPA) Regulations 2022.

The FMP Objective 5 discusses the need to assess the impacts of scallop dredging on the environment. As stated above this has already been done. D&S IFCA would suggest that efforts are immediately focussed on the production of an action plan to mitigate these recognised impacts.

4 Do you agree with the actions to address the evidence gaps?

Details can be found in the **Current status of the fishery** and **Improving the evidence base** sections of the FMP executive summary and **Table 1: Management objectives for king scallop fisheries in English and Welsh waters**. Further details can be found in **Annex 1: Evidence statement** and **Annex 2: Evidence and Research Plan**.

- Yes

Further comments:

D&S IFCA is supportive of the inclusion in the Research Plan of the review of potential solution to gear conflict between the scallop fisheries and other fisheries, in particular the potting fleet in the SW, which will help inform future management measures such as zonal management. Conflict of this nature is an issue within D&S IFCA's District and beyond the 6nm limit.

D&S IFCA welcomes the reference to the use of REM in the FMP to provide spatial data to support MPA /ecosystem management. REM together with IVMS/VMS can be used not only for monitoring compliance of spatial management measures but to inform displacement, spatial squeeze and also to identify productive scallop fishing grounds, as highlighted in a research need under 5.3 of the Research Plan.

D&S IFCA is currently undertaking research into the spawning season for King scallop in its district. These data collected included gonadal weight and maturity and could help inform any future management measures to be considered in the FMP. Data are in the second year of collection and once the report is finalised can be shared with SICG and SICGWG.

5 What role can area-based closures play in effectively achieving stock sustainability and FMP goals under the proposed new management framework (in terms of environmental, economic, social)?

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Details can be found in the **Initial management measures** section of the FMP executive summary, and the **Fishery Management objectives for king scallops in English and Welsh waters table**. Further details can be found in **Annex 1: Evidence statement**.

Comments on area-based closures.

D&S IFCA welcomes the consideration of further seasonal/area-based closures to protect spawning stocks and contribute to stock sustainability. However, the FMP suggests that these will not be achieved until further evidence and information is collated, as described under this measure. There is no timeframe for implementation or discussions on possible areas. It is D&S IFCA's view that this will make slow progress and the lack of definitive area-based management in the plan is a weakness.

The FMP recognises that displacement needs to be fully assessed if further measures are introduced. D&S IFCA would welcome further detail within the FMP on the impact of these closures and the displacement on other fish stocks in particular those relating to crab stocks. Concerns have already been highlighted by the potting sector operating in the mid-Channel blocks, the impact of scalloping seasonal closures which have been implemented. Anecdotal evidence suggests displacement is causing an impact on crab stocks in the area.

D&S IFCA is supportive of the development of a Closure Strategy, but this would require consultation across all fisheries and industry sectors, including regulators, to understand the potential impacts of implementation of measures in the Strategy. D&S IFCA would welcome detail on the principles in the Closure Strategy.

6 Are there particular stock areas you think closures could be beneficial to the FMP goals? Please provide any evidence you have that supports this.

Details can be found in the **Fishery Management** section of the FMP and **Annex 6: Current Management**.

Comments on stock areas.

Cefas stock assessments are important to determine the state of the stocks and where seasonal closures should be implemented to ensure stock sustainability and identify those stocks under greatest pressure and fished above MSY. However, closing one area, for example 7d which has seasonal closures since 2013, puts the pressure on other areas in the English Channel such as 7e. In 2023, the closure was extended in 7e Lyme Bay, and it will be interesting to identify the impacts of this closure on the level of effort in 7e offshore. There is great concern on the displacement impacts not only on scallops stocks in other areas but on stock of other species such as crab which are caught or destroyed by scallop dredges. These impacts have been identified in the Mid Channel blocks area and in the Western Channel. Potentially in order to meet the sustainability and precautionary objectives of the Fisheries Act (for both scallop and crab) and FMP goals closures should be extended out into 7e.O.E. The impact of such a closures may put pressure on other areas such as 7e.I and 7 F.I. Any closures need to have an impact assessment attached to it. Perhaps seasonal closures, as seen as an important stock sustainability measure, should be applied across all scallop areas so that displacement and its impacts are not an issue.

7 Where do you see opportunities for strengthening existing measures to ensure they are fit for purpose to achieve stock sustainability and FMP goals under the proposed new management framework (in context of environmental, economic, social)?

Details can be found in the **Current status of the fishery** and **Fishery management strategy** sections of the FMP and **Management objectives for king scallops in English and Welsh waters table**. Further details can be found in **Annex 6: Current Management measures**.

Comments on strengthening measures.

D&S IFCA appreciates the time, effort and level of engagement that has been undertaken to develop the King Scallop FMP. The FMP and Research Plan outlines a great deal of evidence gathering that is planned to help inform potential changes in management relating to several areas of the fishery including seasonal closures, gear modifications, and consideration of output and input controls. The FMP itself is very high level without any detail on potential management interventions. These are dependent on the collation of information outlined. Overall, it is D&S IFCA's view that there have been missed opportunities within the Scallop FMP to include management interventions, as has been done in other shellfish FMPs, and this leads to the opinion that the introduction of any future changes in management, to support the objectives of the Fisheries Act, will be delayed.

Whilst D&S IFCA is supportive of the inclusion of these longer-term actions, D&S IFCA would suggest they are not management interventions or measures. They appear to be 'business as usual' as part of the implementation and on-going objectives of the FMP and will support future iterations of the plan.

8 Do you agree with the proposal to explore and develop a scientifically based output control approach and/or input control approach, and are there potential benefits and drawbacks (environmental, economic, social) that should be considered early in the process?

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

Comments on output/input controls.

D&S IFCA agrees with the proposal to explore and develop scientifically based output and input controls. However, these approaches are very high level and as stated in the FMP 'sufficient time is required to develop the detail of future measures, which will vary depending on their nature e.g.,

whether the measure is new or updated, complexity of the proposed measure, the evidence available on which to underpin and inform the details and what mechanism will be required to implement the measure'. This suggests that management interventions are yet to be decided in the short to medium term.

D&S IFCA has read the detail of the FMP and are reassured that input and output control are being considered as part of the Harvest Control Rules and Strategy. However, there is little detail in the FMP on what they might look like and how they would be implemented across the different sectors of the fleet. All actions detailed in the plan are based on collecting existing data and identifying new evidence to help inform any proposed measures. D&S IFCA believe there is a great deal of evidence currently available and management measures already in place (in particular in IFCA District inside the 6nm) that can be used to develop controls for the king scallop fisheries. The FMP mentions that a phased approach may be considered or trials across areas or sectors but there is no detail and no timeline for proposals to be forth coming.

9 Are there any additional technical measures that should be considered to protect king scallop stocks and the wider ecosystem, and why?

Details can be found in the **Fishery Management Strategy** section of the FMP and **Annex 6: Current Management**.

Comments on additional technical measures.

D&S IFCA believes that the 95% Bivalve Mollusc catch composition rule on scallop dredging should be reintroduced. The introduction of the Landing Obligation and the revocation of the 95% Bivalve Mollusc catch composition rule for scallop dredging and doubling the available sole quota has incentivised scallop dredging in 7e and in other areas. MMO's analysis shows that profitability has increased for scallop dredging since 2020 and is more profitable than all other forms of fishing other than beam trawling. It is widely recognised that the Landing Obligation legislation has failed to reduce discarding and that failure is compounded by the revocation of the restrictions on dredge fisheries.

Unless the 95% bivalve mollusc measure is reintroduced for scallop dredging, D&S IFCA does not see what would encourage fishers to move to a less profitable form of fishing. Currently scallop dredges are able to fish the same grounds for longer even if the scallop catches are low as they can land other species such as sole making their continued effort on the same ground more profitable. This means that scallop grounds experience greater prolonged effort, reduce scallop density and populations further (and so impacting the breeding potential of the stocks) and will cause greater damage to the environment with this most destructive form of fishing. The introduction of the 95% Bivalve Mollusc catch composition will fulfil the Sustainability, Precautionary and Ecosystem objective of the Fisheries Act and fulfil objectives in the FMP.

D&S IFCA has a restriction on the number of dredges aside (6 aside) in place for all scallop dredge vessels operating inside its District. D&S IFCA would support a limitation on the number of dredges

aside for vessels operating outside the 6nm on a national basis. This would support the Ecosystem Objective and reduce the footprint impact of the dredges.

D&S IFCA has already commented that it supports the reference to the use of REM in the FMP to provide data to support MPA / ecosystem management. D&S IFCA is currently trialling the use of cameras and gear sensors on scallop dredge vessels within its District. D&S IFCA believes that rolling out the use of REM, cameras and gear sensors is an important technical measure that should be introduced, not only to ensure that gear technical measures are being adhered to e.g., number of dredges aside, but can support other technical measures such as catch composition limits and identify bycatch impacts on other species of concern e.g., brown crab, sole.

REM, including trackers, winch sensors and cameras, has been rolled out to all scallop dredge vessels and pelagic vessels operating in Scottish waters and D&S IFCA believes this should be obligatory on all scallop dredge vessels operating in English water.

10 Are there any measures which should be prioritised for early action in line with the precautionary approach, and why?

Details can be found in **Annex 3: Stakeholder Engagement Report** and **Annex 5: Legislative context and Governance** and the **Implementation** section of the FMP.

Comments on measures and the precautionary approach.

See section 10 above.

11 Do you agree that establishing a co-management approach is the most effective way to manage the king scallop fisheries in English and Welsh waters moving forward, and why? What role do you think you/your organisation could play to support a co-management approach?

Details can be found in the **co-management** section of consultation document, and the **Management framework: partnership working** section of FMP.

- Yes

Please explain your answer.

D&S IFCA supports co-management as this is an integral part of the IFCA's role. D&S IFCA has its own vision which states :

We believe in shared responsibility for the health and benefits of the marine environment and uphold our duties, now and in the future. We will be proactive in our management to restore and recover marine ecosystems, habitats and species. We envisage that the waters, under our authority, will support sustainable fishing practices serving local, national and international communities. We will innovate, and champion the use of technology, the delivery of low impact fisheries and the UK Government's 'Net Zero' by 2050 carbon target. We embrace co-management and will drive change in inshore recreational and commercial fisheries, recognising their social and economic benefits, and securing a future for sustainable fishing in the coastal belt.

IFCAs are made up of General Members who brings expertise from a wide range of marine sectors and help decide management measures that are introduced. This is a co-management system that has worked since the formation of IFCAs under MaCAA. D&S IFCA pre-consults and consults on all management measures proposed so that all stakeholders can engage, and their views are recognised and taken into account when developing management measures. Co-management is important to understand all view points and take into consideration all relevant stakeholder groups' expertise and knowledge and provide a basis adaptive management and help incentivise co-operation and compliance of regulations.

D&S IFCA would have like to have seen IFCAs inclusion in the SICG or SICWG from the start of the development of the Scallop FMP and its objectives and unfortunately this does not demonstrate full inclusive co-management. D&S IFCA can provide a role to support the co-management approach if it is involved in the process and has knowledge and expertise of inshore fisheries that is invaluable.

12 How would you like to be involved in the delivery of the plan and the future management of the English and Welsh king scallop fishery?

Details can be found in the **Implementation** and **Fishery management strategy: partnership working** sections of the FMP. Further details can be found in **Annex 5: Legislative Context and Governance**.

Comments on your involvement.

The FMP measure 'Consideration of broad alignment of measures where there are environmental, social, or economic benefits of doing so' describes the outcome as consideration of the current and new measures to ensure that are applied at the most appropriate level and suggests that a log of existing measures will be completed in six months and a report on existing measure will be produced in the short term. D&S IFCA has already provided information to Defra on management measures in place within D&S IFCA's District and other IFCAs have provided similar information. This has been in the form of the 'Shellfish Legislation Tool', to which there have been several iterations since 2020. D&S IFCA believes that all the information of gear specification and other measures relating to the management of the King Scallop fisheries is available to the Scallop Industry Consultation Group. It would have been useful to have these provided in detail (in tabular format) in Annex 6 (King Scallop FMP Current Management) and used by the group to consider options prior to the publication of the draft FMP. The FMP states that the implementation of this measure is on-going or to be kept under review.

D&S IFCA will support the measures being considered by inputting information where relevant and appropriate. This however is not easy to do if it is not involved in the discussion on future

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management measures. D&S IFCA hopes that the process of considering management measures in shared with IFCA so that we can be involved and support the FMP.

D&S IFCA has management measures in place for the scallop dredge fleet operating in its District. D&S IFCA will like to understand how measures in the FMP will align with measure inshore and how the IFCA's can support on-going discussions.

D&S IFCA can also help disseminate information to all those involved in scallop fisheries in its district including commercial and recreational fishers and help their engagement in future management proposals.

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?

Links to other fisheries.

As previously mentioned consideration of the bycatch of other commercially important species such as brown crab is necessary and should be highlighted in the implementation of the FMP. Much better information is needed as to the amount of crab that is caught and killed in scallop dredges so that this can feed into Crab stock assessments. REM, if implemented, will provide this level of evidence and will present up-to-date information on the mortality of brown crab from this form of fishing. The same applies to other commercially important species, in particular flat fish such as sole, that are being caught and landed due to the removal of the 95% bivalve mollusc catch composition requirement.

King Scallop FMP environmental report

The following questions relate to the King Scallop 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.

Please include any additional evidence below

D&S IFCA is currently undertaking research into the spawning season for King scallop in its district. These data collected included gonadal weight and maturity and could help inform any future management measures to be considered in the FMP. Data are in the second year of collection and once the report is finalised can be shared with SICG and SICGWG.

With reference to p.48 – 'The impact of bycatch of species on D1 biodiversity and its relation to D4 food webs', D&S IFCA does not agree that bycatch in the king scallop fishery is at low levels and unlikely to affect population of bycatch species. D&S IFCA would like to know what monitoring of bycatch has taken place on board scallop vessels operating in English waters. There is a clear evidence that catches of sole have increased as a bycatch due to the removal of the 95% Bivalve Mollusc Catch Composition requirement. This needs to be re-instated so that bycatch of other species is not encouraged and therefore potential greater impacts of continued fishing in an area where scallop catches have been reduced but sole catches can supplement income are not realised.. Also, D&S IFCA believes that the bycatch of crab is an issue in the South West and further data are needed to ascertain the level of bycatch. This could be achieved with REM – on board cameras and gear sensors.

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

Section 5 assesses the environmental effects of the policies and actions of the draft King Scallop 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 whelk 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
- Dissatisfied
- Very dissatisfied
- Don't know

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