

Date: 12 July 2024  
Our ref: 475252  
Your ref: MCP\_TOR-MCZ-001



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**BY EMAIL ONLY**

Dear James,

**AMENDED VERSION D&S IFCA's Monitoring and Control Plan (M&CP) for demersal trawl gear on the sub-tidal mud in Torbay MCZ.**

Thank you for sending the Ocean Ecology BACI study report, and the M&CP version 2, received by email on 3<sup>rd</sup> May 2024.

Natural England has considered the M&CP prepared by Devon & Severn IFCA. Please accept this letter as Natural England's formal advice on the M&CP and the conclusions it makes.

Natural England does have some minor comments relating to the M&CP, but this does not alter our views on the validity of the conclusions drawn (**Appendix 1**: Minor comments on M&CP).

**We agree with the approach of setting trigger levels for MCZ Assessment review, and agree that the trigger levels presented in Table 1 of the M&CP version 2 document are appropriate. We are also content that the best available and most up to date evidence has been used in drafting the Torbay M&CP by Devon & Severn IFCA officers.**

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

Yours sincerely,

A handwritten signature in black ink that reads "Jasmine Rix". The signature is written in a cursive, flowing style.

Jasmine Rix

Higher Officer – Marine  
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## **Appendix 1: Minor comments on M&CP**

- Upon reviewing the revised plan, I have a query regarding section 2 of table 1 (annual monitoring of IVMS data for the site). The triggers outlined in sections 1a and 1b are specific to vessels under 12 meters (U12m). Could you please clarify whether the trigger level in section 2 is designed to capture data on vessels larger than 12 meters (over 12m) if they begin to use the site? We would want to ensure that there was the facility to capture over 12m vessel interactions as well as monitoring the U12m vessels.
- While the BACI study did not find any statistically significant differences between trawled and control areas during the study, the authors do note the limitations of that study, and the reduction in high-level ecological indicator (IQI) values from “high” ecological status to “good” in those areas subject to heavy trawl gear use after six months, and suggest that this may be of concern to managers. However, since the baseline of activity is very low (2019 – one tow of under 20 min duration) and therefore not above the trawling effort in the BACI study, and the proposed trigger levels are appropriate, this is not of current concern but rather a note of caution which further justifies the ongoing close monitoring of the activity across the site, as outlined in the revised M&CP.