



**D&S IFCA's Response to
MMO's Consultation on Proposals for a King
Scallop Fishery Closures
in ICES Area 7d and Lyme Bay of Area 7e
in 2025**

12th January 2025

Devon and Severn Inshore Fisheries and Conservation Authority

The Inshore Fisheries and Conservation Authorities (IFCAs), including Devon and Severn IFCA (D&S IFCA), are statutory regulators. The ten regional IFCAs have a shared vision: "Inshore Fisheries and Conservation Authorities will lead, champion and manage a sustainable marine environment and inshore fisheries, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry."

The IFCAs are responsible for the sustainable management of sea fisheries resources in English waters from baselines out to six nautical miles. D&S IFCA's District includes waters from baselines to six nautical miles on the south and north coasts of Devon and north Somerset, and the waters of the Severn Estuary out to the median line with Wales. D&S IFCA's District includes areas of ICES rectangle 7e

The powers and duties of the IFCAs are provided by the Marine and Coastal Access Act (2009; the Act). D&S IFCA statutory duties include:

- (a) to seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way,
- (b) to 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) to 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) to seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district.

D&S IFCA's response to the consultation relates to questions 1,2, 6, 7, 8.

Q1. A proposed closure prohibiting UK and EU scallop dredge fishing for vessels in UK waters of ICES area 7d, for the following time periods:

- a) From 15 May to 30 September 2025
- b) From 1 July to 30 September 2025
- c) Retain extended closure period for Lyme Bay area of 7e, roll back closure period in 7d to shorter closure period
- d) No closure within any time period

D&S IFCA Response:

The consultation states that the spawning period for king scallops within ICES area 7d is between May and October, with peak spawning typically in summer and that scientific evidence indicates that protection for stocks against fishing activity during the summer months is likely to deliver the most benefit. D&S IFCA undertook research in 2022 to identify the timing of King Scallop spawning in its District by measuring the gonadosomatic index (relative roe size). The results showed that the majority of scallops in South Devon are likely to reach maturity and peak spawning condition between April and late July and that most spawning activity occurs from early June through to September. Preparation for spawning peaks in early May when the peak in relative roe size occurred. Relative roe size then declined steadily

throughout the sampled period (to mid-October) as gonad weight decreased relative to total body weight. This change was associated with spawning from May throughout the summer season. The period in which more than 50% of scallops are mature (nearing spawning) in South Devon is likely to range between early April and the end of July but may extend into mid-August. The proportion of scallops classed as recently spawned increased rapidly from mid-May and peaked in early September, indicating the peak spawning period occurs between June and early September.

With this in mind either the periods stated a) or b) above would protect the stock that is preparing to spawn and is spawning. Whilst a closure from 15th May to 30th September would protect those scallops that are preparing to spawn and align with the EU closure of 7d, this will cause further displacement of effort for a longer period of time and a shift in effort to 7e areas further down the Channel that remain open. As the purpose of the proposal is to protect the stock of scallops during the main spawning period within 7d and 7e then the proposed closure b) from 1st July to 30th September would fulfil this objective and aligns with D&S IFCA closed period for the removal of scallops by its scallop dredge fleet.

D&S IFCA therefore would support a closure from 1st July to 30th September. However, if the closure is to protect the spawning stock, as stated in the consultation, this should be applied to **all areas within 7d and 7e**. Currently in 7e it only applies to 7eL (Lyme Bay). If the intention is spawning period protection then it should apply through the ICES areas 7d and 7e including 7eO and 7eI.

Q2. If you consider a closure an appropriate option, which vessel size should be included in the closure? Also, within which ICES areas would be most appropriate?

D&S IFCA's Response:

Currently (January 2025), D&S IFCA has issued 105 Mobile Fishing Permits for vessels operating mobile fishing gear i.e. trawl and scallop gear. Of these, 57 indicated they used scallop dredges in their fishing operations. Thirty-four (34) are under 12m in overall length with 21 vessels being under 10m length and 13 vessels being between 10m and 12m in length. Twenty-three (23) vessels are over 12m in overall length. D&S IFCA's maximum length of vessel is 14.99m. D&S IFCA has a closed season for scallopers from 1st July to 31st September. Extending the closure to the 15th May will remove fishing opportunities for approximately 6 weeks for those smaller vessels that are not able to fish outside the D&S IFCA's District.

The landings by the over 12m fleet, especially the over 15m vessels who operate with a larger number of dredges aside, will have the greatest impact on stock levels. Therefore, the 12m and under fleet effort and landings are small in comparison. From previous years' consultation documents, the landings for 7e in 2022 suggest that vessels of 12m length and over accounted for about of 85% of landings within Lyme Bay during either the current or an extended closure period. If the under 12m vessels are excluded from the closure this will allow them to continue fishing between 15th May to 1st July in D&S IFCA's District (if they are permitted by D&S IFCA to do so) and outside of the District in the Lyme Bay area if these vessels are able to continue to fish during the closed season and are able travel to grounds outside the district when D&S IFCA's closure comes into place. In summary, D&S IFCA suggests that the closure should only apply to vessels greater than 12m in length.

In addition, D&S IFCA suggests that the information provided within the consultation document should include the landings (both in total and quarterly) by the different size vessels. It would be useful to see the landings of vessels under 10m, between 10-12m, 12m to under 15m, and

15m and over, in each of the ICES area within 7d and 7e. This breakdown would show where the greatest effort is being exerted and where future management measures should be directed to which part of the scallop fleet.

Q6. Would you consider any alternative areas to be of concern to displaced effort as a result of any proposed closure? I.E ICES rectangles other than those covered in the closure, or other areas such as the mid-channel potting blocks.

D&S IFCA's Response:

Yes.

As mentioned in previous responses to king scallop closures, D&S IFCA is concerned that closing 7d and 7eL is causing displacement of the larger scallop vessels into 7eO and crab fishers have highlighted that those over 15m scallop vessels that have large number of dredges aside e.g. 18 to 22 dredges, are causing a significant impact on crab stocks in the Channel and particular around the Mid-Channel Blocks that lie within 7eO. The effort of these vessels has impacted the crab stocks, through damage to the crabs, through bycatch in the dredges, damage to the habitats and a decline in crab catches in the pot fisheries so impacting the crab fishermen who operate in the crab blocks when they are open. The Chart (Figure 1) below shows the ICES sub-rectangles together with the Mid Channel Potting blocks A & B and the EEZ boundary. The closure of Lyme Bay inshore 7e (ICES sub-rectangles 30E6, 30E7, 29E6 and 29E7) together with 7d would likely causes displacement into the north east corner of ICES rectangle 28E7 and into 28E6 (7e O (offshore)) and further down channel into 7.e .I (Cornish inshore /offshore waters) as shown in Cefas Assessment of king scallop stock status 2021¹). The Mid-Channel blocks take up much of ICES rectangle 28E6.

Displacement of many large scallopers from 7d into 7e Lyme Bay and Offshore (28E7 and 28E6) was reported by South Devon and Channel Shellfishermen in 2022 and 2023 and led to gear conflict and loss and damage to crab catches/stocks in the vicinity of the mid channel blocks. Some of D&S IFCA's Potting Permit holders fish in the mid-channel blocks and therefore damage to their fishing opportunities in the blocks will likely cause increased displacement of potting effort into D&S IFCA waters to remain viable for the rest of their fishing season. There is real concern regarding the damage that scallop dredgers can do to crabs and crab stocks on the ground. Crab catches have been in decline over recent years in the South West as reported to the Crab and Lobster Fisheries Management Plan working Group and Shellfish Industry Advisory Group and has been raised and discussed with Defra. Any increase pressure of the stock due to displacement of large scallopers may lead to further declines.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/977732/Scallop_assessment_report_2020_main_report.pdf

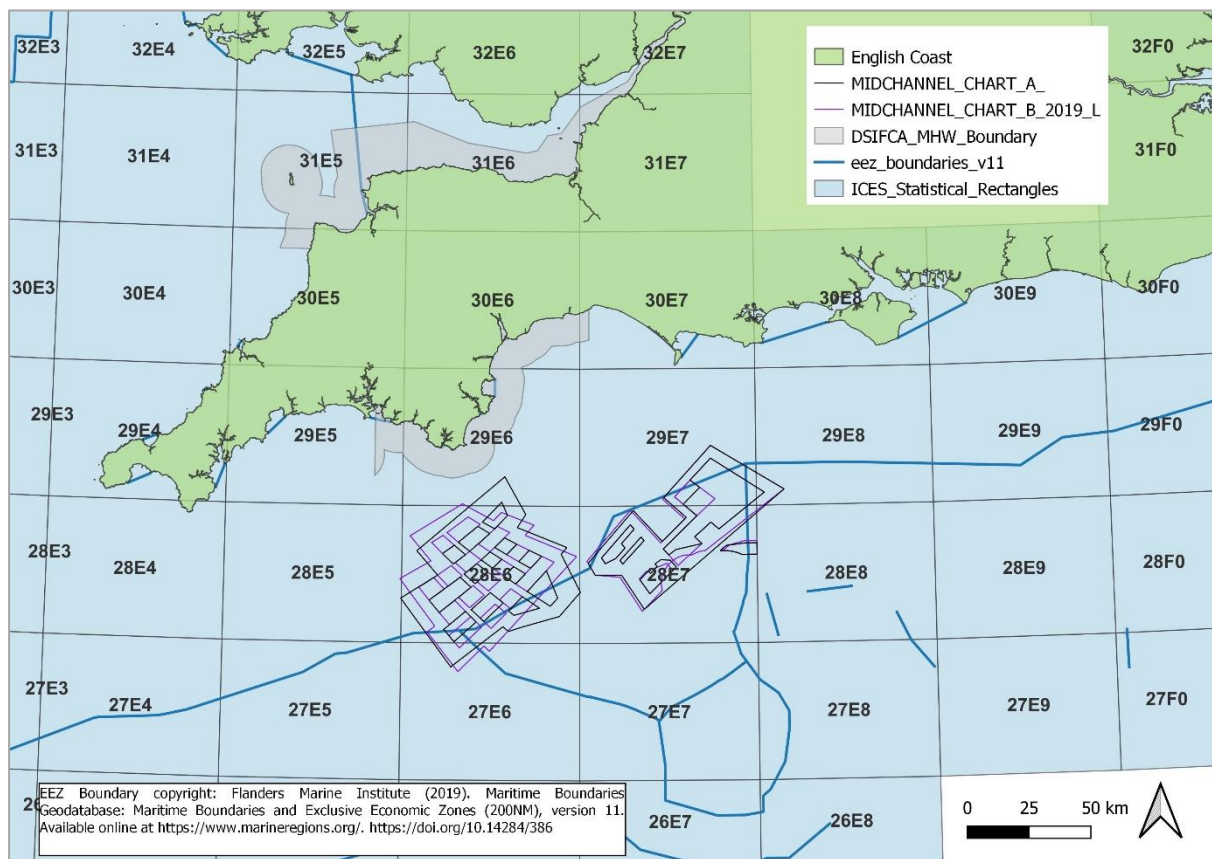


Figure 1 Chart of the English Channel showing ICES Rectangles and Mid Channel Blocks

Q7. Are there any temporary measures that should be considered whilst longer term management is implemented through the king scallop Fisheries Management Plan?

D&S IFCA's Response

Yes.

From Cefas' Assessment of King Scallop Stock status in selected waters around English Coast 2023², it is clear that 7d is now being fished below the MSY target but 7eL is overexploited and harvest rates (for 2022 - 71.9% harvest rate on the dredged portion of the stock and 40.7% on the wider stock (including UVS survey)) is much higher than the MSY reference point harvest rate target of 24.4%. Therefore, the current measures in place are not reducing the harvest exploitation rate on the stock in this area. The displacement caused by the previous closure in 7d and 7eL have caused an increase in effort and corresponding increase in landings in 7eO and 7eI.

D&S IFCA suggests that other management measures are implemented to reduce all these additional consequences of the closure in 7d and 7eL. D&S IFCA believes that whilst 7d, 7eI and 7eO are being fished below the MSY target, area 7eL is, from the Cefas stock assessment, still overexploited above MSY. Therefore, an additional management measure of reducing the number of dredges aside in area 7eL would reduce the effort and therefore the exploitation rate. If the number of dredges was reduced to 10 aside this would restrict the effort significantly. Currently the closures seem to only benefit the larger vessels whose effort increases such after the closure ends that they outcompete the inshore vessels. The overexploitation of the scallop stock by those vessels with larger number of dredges has

therefore continued and the scallop closed season has done little in area 7eL to reduce the harvest rate down to the MSY target level. It might be suggested that in order to fulfil the Fisheries Act's Sustainability Objective as well as the Bycatch, Ecosystem and Equal Access Objectives that a more precautionary approach under the Precautionary Objective should be applied – where the number of dredges aside is reduced for the over 15m vessels operating in English waters in 7d and 7e for the whole year. The stock assessments may then start to show that the exploitation rate is reducing in particular in 7eL to come closer to the MSY reference point harvest rate.

D&S IFCA is a supporter and advocate of automatic remote electronic monitoring (REM) and has been trialling REM on some of its scallop vessels. This has been very successful and has been used to monitor the number of scallop dredges aside used by the vessels and also allows alerts to be issued when vessels are operating in prohibited areas. This technology has been used by other regulatory authorities and D&S IFCA believes this could be applied to the UK scallop fleet operating in areas 7d and 7e so that a reduction in the number of dredges could be achieved and be well monitored for compliance. It would appear from the evidence gathered to date by Cefas that a closed period alone is not reducing overexploitation and further restrictions are required. Reducing the number of dredges and then monitoring compliance is a management measure that could be implemented successfully.

Q8. Do you have any other comments?

D&S IFCA's Response:

Yes.

Cefas Stock Assessment 2023² provides some information on landings in the different areas of 7d and 7e. The landings in 7eL (Lyme Bay) show a big jump up in Quarter 4 and Quarter 1 to make up for the loss of fishing opportunities and earnings due to the closed period (Table 3.2)². The landings in Quarter 4 of 2023 have doubled compared with those of previous years showing the increased effort following the closed season. Areas 7eO and 7eI have also seen increases in landings in Quarter 3 (table 3.3)² which is likely due to displacement of vessels from 7eL and 7d during the closed season. The landings in area 7eI in 2023 show a huge increase compared to 2021 and 2022 (1381 tonnes compared to 859 tonnes in 2021 and 891 tonnes in 2022).

This apparent and documented increase in effort after the closed season ends has an impact not only on the stocks but also on the markets as they are being flooded by scallops causing a decrease in price. The increased effort after the closure is having an impact on the smaller vessels trying to make up their earnings due to the displacement and higher effort of the larger (over 15m) vessels. Whilst areas 7eO and 7eI have seen the increase in effort due to the closed season currently the harvesting rate has remained below the MSY target rate, but D&S IFCA would ask how long before these stocks become over exploited?

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[Assessment of king scallop stock status for selected waters around the English coast 2023](#)

A Defra and Industry Funded Project. Jessica Harvey, Nikolai Nawri, Daniel Clarke, Karen Vanstaen, and Ramon Benedet
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