



Devon and Severn IFCA
Response to Points made by Offshore Shellfish
on D&S IFCA's Consultation Response for
MLA/2025/00025

22nd May 2025

D&S IFCA has been forwarded Offshore Shellfish Limited (OSL) response to D&S IFCA consultation response to MLA/00025/2025. D&S IFCA appreciates the opportunity to respond.

D&S IFCA has reviewed the document and would like to make the following observations:

1. As previously stated, D&S IFCA is aware that the area is not trawled all year and consistently by the vessels whose IVMS data have been analysed. The data show they do undertake fishing activity in Labrador Bay and across the proposed location of the farm. OSL has analysed the data to show the time spent in the site and D&S IFCA does not disagree with the calculations. However, the amount of time spent in the site is not indicative of how the fishers regard the whole area as part of their annual fishing operations. Only part of a fishers' tows will be in the proposed farm site. Therefore, making constant references to the amount of time in the proposed box is not appropriate. The whole length of all tows should be considered when looking at the importance of an area to the existing users. The fishers who have liaised with D&S IFCA regards the area as important to them.
2. OSL states that the 'use of the area and surrounding area in poor weather does not prove the ground is valuable but simply that the vessel is not fishing elsewhere in poor weather.' This may be the view of OSL, but it is the fishers that have raised these concerns and that their historic fishing grounds have value to them. The fishers have indicated the species they fish and to them during times of the year and also during periods of poor weather this area allows them to catch the species they have listed and how the area contributes to theirs' and their crews' livelihoods when it is not possible for them to go elsewhere. Different sectors and stakeholders will place different values on a site and D&S IFCA is relaying the concerns of the fishermen who have engaged with them. D&S IFCA believes it is important to have regard for them and their use of the area as historic fishing grounds. The points continually raised by OSL that fishers can go elsewhere and the area is not important to them is unjustified. OSL states that there is no evidence to support the actual value of the grounds other than rarely repeated tracks. The tracks do show the use of the ground when inspecting the fishers tows across the whole area rather than just in the site proposed. Fishers have the best knowledge and experience of fishing grounds and will only return to an area if it has fish that they are targeting, and it is profitable to them to go there.
3. Trawling vessels do need a larger turning area than scallopers and even the IVMS tows show they cannot make sharp turns. The fishers tracks follow contours and the known grounds and habitats when the fish species they wish to target frequent,
4. OSL is correct in saying that the fishers have avoided the area where the RTS site was initially located and also where it was finally located. They did this to avoid getting tangled up in disused unmarked structures. Over the time of the RTS site has been located in this area, the ground has been used by potters and now the area too is not accessible to the trawlers unless they have conflict with potting gear. The different sectors will dispute this with each other and as the area is not closed to demersal gear it is not something that D&S IFCA can enforce.
5. OSL states that the 'presence of the site in the proposed location will not prevent any of the above marine activities [fishing vessel, commercial or pleasure craft] from taking place elsewhere.' Fishing by whatever sector is always seen as being easy to displace. D&S IFCA deals with issues of spatial squeeze regularly and the commercial fishing industry relay their concerns on the increase in areas closed to demersal fishing gear and that their views are not recognised. D&S IFCA is relaying

these concerns to OSL which is why D&S IFCA has tried to work with fishers find alternative locations.

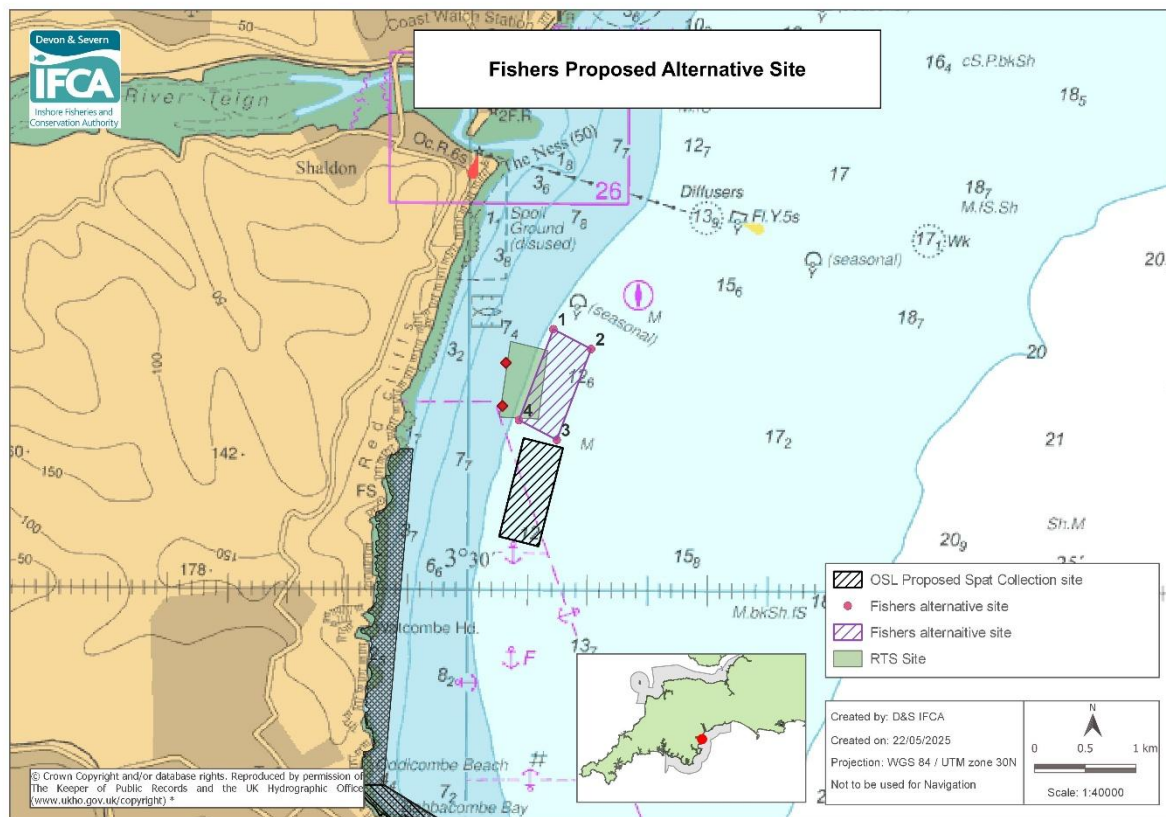
6. OSL raises, on several occasions, that there will be minimal impact on all users, stating in their response that 'OSL have minimised the impact the site will have on ALL users by locating the proposed site in an area of low traffic'. Other users including recreational craft, other boating sectors including tugs, special craft, tankers can easily move around structures as they do not have trawls nets, trawl doors and warps on the seabed and attached to their vessels. By the very nature of trawling this is not the case. These other craft will not attach the same importance to this area, and they can move with minimal disturbance. This has been well demonstrated by other boating sectors avoiding the scallop ranch in Torbay.
7. D&S IFCA appreciates that OSL has provided more information on the need to have 11m depth and appreciates that the environment in Labrador Bay is very different to a Danish Fjord. The site suggested by fishers closer to the RTS site adjoins the 10m contour. Perhaps moving this to the 11m contour might be a way forward in allaying the fishers' concerns. The location proposed by fishers and sent to OSL on 4th December 2024 (see Appendix 1) appears to be in approximately 11m in depth as it does not abut the 10m contour. Unfortunately, D&S IFCA does not have a detailed chart of the area showing point depth, but this position may satisfy the fishers who engaged in the discussion. Has this area been surveyed for depth and could it be reconsidered?
8. The AIS data chart and charts of other boating sectors show only slightly more activity in the area suggested by the fishers and these other boating vessels can move slightly to avoid the farm. It would appear that all other sectors considerations are being put above those of the demersal fishing vessels that do use the area as part of their fishing operations and livelihoods. Those other boating sectors can move without impacting their businesses.
9. OSL describes S.69 MaCAA 2009 as only relevant in this case if the proposed location was the only possible location for the activity to occur. S.69 states that the licensing authority must have regard to the need to prevent interference with legitimate uses of the sea. Fishing is a legitimate use of the sea, as is aquaculture. If fishing can occur in a different location the same could apply to the spat collection farm.
10. OSL has highlighted the benefits of offshore mussel farms from research undertaken. Whilst the spat collection farm may provide a refuge to certain fish species the added benefit of commercial fish species to the demersal fishing sector is not as well documented and how this will benefit the demersal fish populations is unknown.
11. OSL has verified that the fishers they spoke to in Teignmouth were from the potting sector and D&S IFCA understands that they will provide a positive response as mobile and potting sectors often have conflicting views on activity suitable in certain areas, and there is well known conflict in the sea space between these sectors. D&S IFCA does not hold one sector more important than another. D&S IFCA responds on a case-by-case basis considering those sectors who may be impacted by any marine development proposals and respond accordingly with evidence to show whether or not there will be an impact on existing users by a development proposal.
12. In terms of engagement whilst fishers did not attend the first meeting, D&S IFCA did not send reminders (e-mail or calls) of the meeting date and time but contacted them when the meeting was about to start to see if they were attending. In fact, at the second meeting D&S IFCA was criticised for not reminding them of the first meeting date and time. D&S IFCA organised a second meeting with the hope that OSL would attend. It is a shame that OSL could not find a representative to attend as they would

have heard first hand of the concerns of the fishers and been able to discuss their proposal in more depth and together find a more suitable location.

In summary, D&S IFCA would like OSL to consider relocating the site to the North East of the proposed location as indicated in Annex 1. This would help minimise the impact of the farm to the existing use of the area by the demersal fishing vessels.

Sarah Clark
Deputy Chief Officer
D&S IFCA

Annex 1



Point	GIS Long	GIS Lat	Longitude	Latitude
1	-3.48835	50.52288	003° 29.301' W	50° 31.373' N
2	-3.48308	50.52114	003° 28.985' W	50° 31.269' N
3	-3.48778	50.51307	003° 29.267' W	50° 30.784' N
4	-3.49305	50.5148	003° 29.583' W	50° 30.888' N