



Review of the Mobile Fishing Permit Conditions

Formal Public Consultation Proposals

Amendments to Category One Mobile Fishing Permit Conditions

What is this about?

D&S IFCA is inviting you to respond to the formal public consultation on proposed amendments to existing Category One (at sea) Mobile Fishing Permit Conditions. To make changes to the Permit Conditions, D&S IFCA must follow a process that includes formal public consultation.

We are directly contacting everyone on our (email) mailing list to set out how to respond. We are also writing to permit holders that have not provided us with an email address. Your view is important, and we also encourage you to forward this information or to notify others that may have an interest in the formal public consultation.

All stakeholders (for example fishermen with any type of D&S IFCA permit, recreational anglers, organisations, or anyone with an interest in the marine environment) can respond to each of the **three proposals** in this formal public consultation even if they do not conduct mobile fishing within the D&S IFCA's District. Information is available on the D&S IFCA's website to support this formal public consultation together with details on how you can respond. The formal public consultation begins on **9th April 2026** and will end on **7th May 2026**. This formal consultation includes a privacy notice relating to the protection of personal information.

Summary of the Proposed Changes

Each of the proposed changes are explained in more detail within this formal public consultation; however, in summary, the formal public consultation focuses on the following three proposals:

- 1) To open a new dredge fishery for razor clams in the South of the D&S IFCA's District.

It is proposed to use a series of Permit Conditions to regulate this new fishery, including defining where the activity can take place within the areas classified for the harvesting of razor clams by the Food Standards Agency and the use of Remote Electronic Monitoring (REM) being fitted to the harvesting vessel to monitor the new fishery.

- 2) To introduce protective measures, using the Permit Conditions, for mariculture sites that have already been licenced by the Marine Management Organisation (MMO) and established in Labrador Bay, South Devon and Bideford Bay, North Devon.

It is proposed to prohibit demersal mobile fishing within these two mariculture sites (set out within this information) and in the Annexes to the Permit Conditions.

- 3) To change the requirement relating to the transmission of IVMS data to reflect the installation of Rewire devices.

It is proposed to amend the Permit Conditions so that Permit Holders with a Nemo (CLS UK (Fulcrum Maritime Ltd)) and a Rewire Security Vessel Monitoring Device fitted to their vessels are compliant with the requirements relating to the transmission and availability of relevant data.

The Process for Change

The Permit Conditions are flexible and can be amended by following the process set out in the Mobile Fishing Permit Byelaw 2022. The D&S IFCA's Byelaw and Permitting Sub-Committee (B&PSC) has the responsibility of reviewing the management of fishing activities and byelaw permit conditions. A list of B&PSC Members can be found on D&S IFCA's website or by clicking [here](#).

Information provided to the B&PSC

On 26th February 2026, the B&PSC was presented with information and evidence, and two Officers' papers setting out Officers' recommendations for this formal consultation. The information presented to the B&PSC is available to read by visiting D&S IFCA's website:

The Authority and B&PSC Meetings website page or Section B of the website Resource Library:

<https://www.devonandsevernifca.gov.uk/authority-meetings/>

<https://www.devonandsevernifca.gov.uk/resource-library/b-internal-practice-and-procedure/>

On 26th February 2026, Members of the B&PSC determined their proposals for the formal public consultation that may result in changes to the Category One Mobile Fishing Permit Conditions.

The findings of this formal public consultation will be documented and discussed by the Members of the B&PSC before any changes are made to the Category One Mobile Fishing Permit Conditions. The next B&PSC meeting is anticipated to take place in June 2026. If changes are agreed by the B&PSC they will come into force during 2026.

Your Response

We have included some prompts to help you set out your response, but this is not a questionnaire. Your response can be as detailed as you wish and relate to one or all of the proposals. We very much encourage you to explain the reasons for your views and provide supporting information, if you have any, so that all the information can be considered in the decision-making process.

Responses sent by email or letters are preferred, however you can also telephone us or meet with us in person if you prefer.

It is useful for us if every response contains the following information:

- A) Your name and contact details (if not already on our mailing list).
- B) What interest do you (or your organisation) have in mobile fishing activity and this formal consultation?
- C) How were you made aware of this formal public consultation? (e.g., by this circular, D&S IFCA's website, D&S IFCA Facebook, from someone else, or other source).

Sending in your response/contacting us

1. Contact us via email – consultation@devonandsevernifca.gov.uk
2. Write to us: D&S IFCA, Brixham Laboratory, Freshwater Quarry, Brixham, TQ5 8BA.
3. Call us to find out more about the formal consultation – 01803 854648 (Extension 856)

- **This formal consultation begins on 9th April 2026 and will end on 7th May 2026.**

The Proposed Changes – Detailed Information

Proposal 01:

- To open a new dredge fishery for razor clams in the South of the D&S IFCA's District.

It is proposed to introduce a series of Category One Mobile Fishing Permit Conditions to regulate a new razor clam dredge fishery. This includes defining the fishing gear to be used, spatial management, and the use of Remote Electronic Monitoring (REM) to monitor the fishery.

Proposed Access Areas for the Razor Clam Fishery

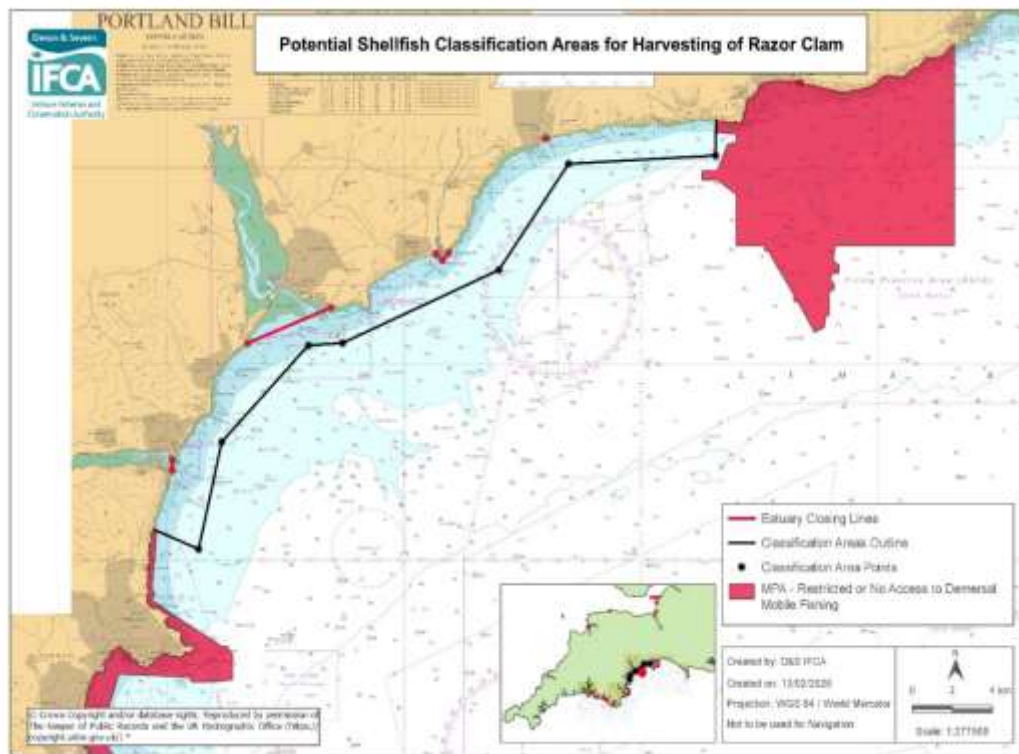


Figure 1: Proposed shellfish classification areas for the harvesting of razor clams.

- The fishing activity will be prohibited within Marine Protected Areas.
- The fishing activity will be limited to Shellfish Classification Areas for Harvesting of Razor Clams by the Food Standards Agency as shown above (areas classified within the coastal zone with a black boarder).
- Permit Conditions will be introduced to link the access areas being authorised by the Permit Conditions to a new Annex specifically for the razor clam fishery.

The Proposed Interpretation:

A new interpretation will be developed to define a razor clam dredge that will be as follows (or similar).

A 'razor clam dredge' means a dredge where

- i. any part of the dredge does not exceed one metre in width; and
- ii. any blade fitted to the bar of the dredge does not exceed 400mm in depth, and
- iii. that the dredge uses a continuous air lift retrieval system to bring the catch immediately to the surface, and
- iv. that a maximum of two dredges can be used at any one time.

Monitoring:

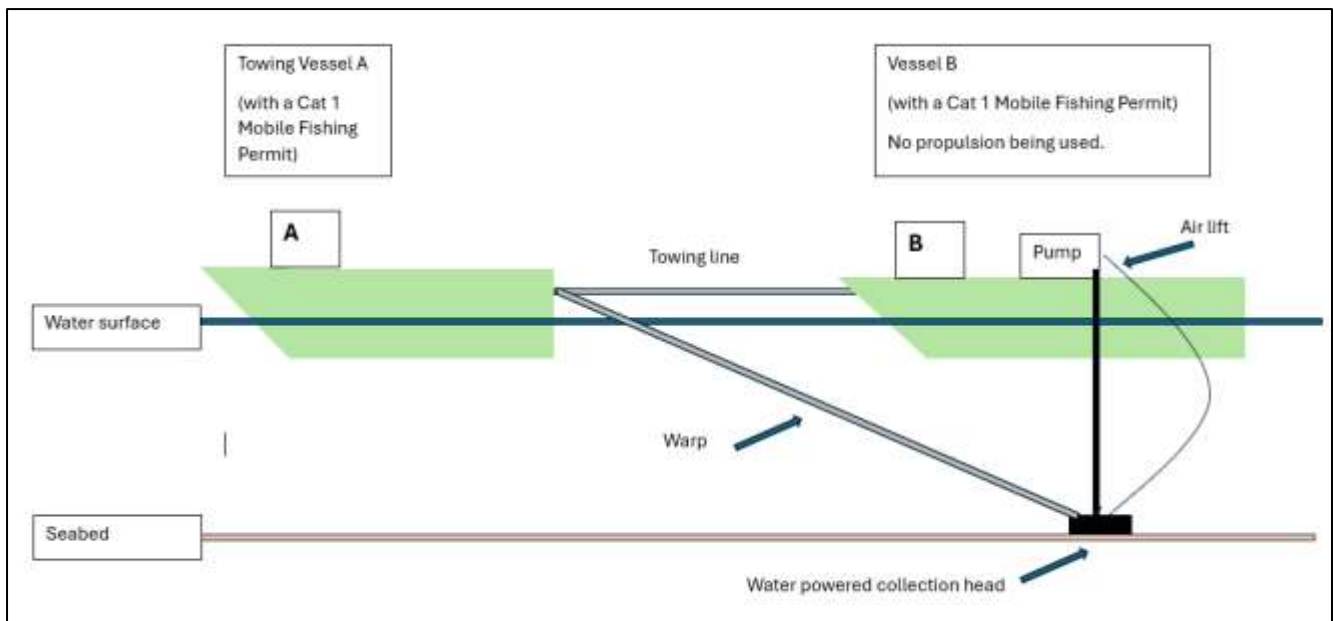
The B&PSC recognise the need to monitor this new fishery if it is authorised to take place. The B&PSC are proposing that Remote Electronic Monitoring (REM) is fitted to the fishing vessel, as a Permit Condition, so the fishing activity can be fully monitored. REM is an integrated system using an array of electronic equipment, such as gear sensors and video cameras used to remotely monitor fishing activities.

- Permit Conditions will be developed for the fitting of and use of REM, and the action that must be taken if the REM system is no longer functioning correctly or needs replacement.

If this fishery becomes established, a Monitoring and Control Plan, to go alongside the Permit Conditions, will include monitoring of footage and data from REM and IVMS to ensure the fishery takes place on sandy ground and to monitor the location of the fishery. Landings data will be gathered and linked to IVMS data to develop a preliminary stock assessment forming a baseline against which Officers will be able to assess spatial and seasonal changes in landings per unit effort. D&S IFCA Officers will undertake a limited number of onboard catch monitoring surveys to assess the catch, the proportion of juveniles and record the damage rates of catch and bycatch.

Explanation and Rationale

A fisherman has approached D&S IFCA with a view to targeting razor clams in the south of D&S IFCA's District. D&S IFCA's duty, under S153 (2) (a) MaCAA 2009, is to seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way. As this a developing fishery in D&S IFCA's District it warranted consideration by the Members of the B&PSC. The fisherman has explained his intended fishing method to the B&PSC. The method consists of two vessels that must both have Certificates of Registry and Fishing Licences, and both will require separate Category One Mobile Fishing Permits. The forward vessel tows the second vessel and puts pressure on the fishing gear via a warp and is essentially a very slow simple dredging operation.



The second vessel (Vessel B) uses no powered propulsion during fishing. The method uses a one metre wide water powered razor dredge that reaches a depth of approximately 35cm to 40cm. When using a single dredge, it creates a single trench, approximately 1 metre width which is much less than the footprint of a single scallop dredger. The razor clam dredges have no teeth, like a scallop dredge.

A maximum of two dredges may be deployed but initially the operation would use a single dredge. The dredge uses water jets to displace razor clams which are then air-lifted to the surface at the moment of capture.

The air lift method dictates that the pipe must remain as vertical as possible and that necessitates a second vessel being used to pull the dredge forward as the sand is cleared by the jets. Any forcing of the dredge through the sand results in broken shellfish so the method is more suited for use by small boats with low horse power. The fisherman has suggested that this system will retain razor clams in good condition with minimal damage, which in turn should maximises shelf life and value. Although this is a new and innovative type of mobile fishing, the potential introduction of Category One Permit Conditions will not prevent other fishermen investing in the required specialised equipment and engaging in the razor clam dredge fishery – it is not a limited permit approach.

Research Work and Impacts on the Seabed:

D&S IFCA has worked with Cornwall IFCA (CIFCA) and the fisherman to undertake research on the impact of this novel fishing gear on the sandy habitat within a small area of Lantic Bay that had been previously classified for the harvesting of razor clams. CIFCA's survey vessel Tiger Lily deployed an underwater camera and go-pros (cameras) to observe the visual impact of the airlift dredge on a comparable habitat on which the fishery would take place in Devon. All catches from the tows were recorded and examined for damage.

The visual impact of the fishing method on the seabed has been examined. The trials took place on sandy types of habitat in which razor clams live and which are similar to the habitats in the areas where the activity is proposed to take place in South Devon. The type of sandy habitat where the fishing activity is proposed to take place, is shallow water, and will be highly influenced by tides, wave action and storms. The trenches left by the gear are likely to be infilled within hours of the activity with the tides, currents and water movements in the shallow depths.

- The findings from the surveys within both IFCA Districts were reported to and considered by the Byelaw and Permitting Sub-Committee when developing this proposal.

Water Classification:

The removal of razor clams from the sea will require classification under EU Regulation 627/2019. The area classified is then monitored on a monthly basis to ensure the shellfish meet the classification given which in turn ensures that shellfish are safe to eat. There are stricter classifications allowing for direct consumption and others requiring purification, re-laying, or cooking so the shellfish are safe for human consumption. Sandy Bay, to the east of the mouth of the Exe Estuary, has previously been classified for the surf clam (*Spisula spp.*), which may aid the timeframe for classifying the areas suggested by the fisherman.

Proposal 01: Your Response:

You can choose how to set out your response; however, the following questions (any or all) function as prompts and may help you set out your response and may help Officers to collate your views. Please provide any information that may support your view.

1. Are you a Category One Mobile Fishing Permit Holder?
2. If not, do you have another D&S IFCA Permit, or what is your main interest in this proposal?

3. Will you be impacted (positively or negatively) financially or otherwise, by the proposed introduction of a razor clam dredge fishery – how and why?
4. In what ways will the different fishing sectors or the environment be impacted (positively or negatively), by this change – how and why?
5. Do you have any other comments or suggestions relating to proposal 01?

Proposal 02:

- **To introduce protective measures, using the Permit Conditions, for mariculture sites that have already been licenced by the Marine Management Organisation (MMO) in Labrador Bay, South Devon and Bideford Bay, North Devon.**

It is proposed to introduce Mobile Fishing Permit Conditions to prohibit the use of mobile fishing gear within the defined area of two mariculture sites.

The Locations of the Mariculture Sites:

There are two sites, both shown.

Mussel Spat Collection Site - Labrador Bay South Devon:



Positions:

1. 50° 30.792 N 003° 29.543 W
2. 50° 30.268 N 003° 29.742 W
3. 50° 30.217 N 003° 29.413 W
4. 50° 30.741 N 003° 29.214 W

Seaweed Farm – Bideford Bay, North Devon



Positions:

1. 51° 03.489 N 004° 22.258 W
2. 51° 03.161 N 004° 21.687 W
3. 51° 03.642 N 004° 20.880 W
4. 51° 03.981 N 004° 21.438 W

The Proposed Permit Conditions

The above areas will be added to current Annex 12 (No Access Areas – Coastal Mariculture Sites).

The Category One Permit Conditions (paragraph 10.1) will remain as follows:

A permit holder or a named representative must not access the areas as defined by the co-ordinates set out in the attached Annex 12 to these permit conditions (the Coastal Mariculture sites) with demersal mobile fishing gear unless the demersal mobile fishing gear is stowed on deck and no fishing is taking place.

Explanation and Rationale

Both of these sites have already been granted Marine Licences by the Marine Management Organisation (MMO). Regardless of the outcome of this formal consultation, these two sites are already established, and will remain where they are.

Regarding the mariculture site in Labrador Bay South Devon, D&S IFCA responded to the Marine Licence Application and suggested a change in the location and orientation of the site to reduce the impact on the local mobile gear vessels who have historically fished in the area. The Marine Management Organisation (MMO) considered all the information from the consultation (including [D&S IFCA's response](#)) on the Marine Licence Application, including impact on other marine traffic, and granted the licence for the site in the original proposed location. The B&PSC has recognised that this site for Offshore Shellfish Ltd (OSL) is now established and its location will not change.

Algapelago Marine Ltd (AML) were granted a Marine Licence to locate the seaweed farm in Bideford Bay, North Devon, in 2022. The site is 116 hectares in size and is marked on the most up to date Admiralty Chart. AML worked closely with the local fishermen to locate the farm in an area that would least impact the existing users of the area, and some of the North Devon fishermen continue to help support the operation of the farm. The farm has longlines spaced so that seed can be deployed on the lines and allows for maintenance and harvesting. The farm grows and harvests sugar kelp in the upper reaches of the farm area and also have a dispensation to grow shellfish within the farm site. AML is currently on-growing mussel seed on lines in the midwater area of the farm. AML are also considering seeding and growing native oysters on the seabed below the farm. The farm site is described by AML as a 'Blue Forest creating a new, complex habitat for keystone species, accelerating marine restoration, providing refuge, habitat and food to enable marine regeneration'.

The Authority supports sustainable development and recognises the benefits of growth in mariculture in the District. Mariculture sites are at risk from incursions by mobile fishing vessels that can damage the farms and deter further investment into this fishing sector. In recent years there have been reported incursions into mariculture sites which have resulted in significant financial costs to the owners of the established sites. These losses are similar to the financial losses suffered by static gear vessel owners when their pots and nets are towed away by demersal towed gear vessels fishing illegally within the Marine Protected Areas.

The B&PSC has recognised that using the Permit Conditions to prohibit demersal mobile gear vessels from fishing in mariculture sites is a way to reduce the risk of damage to the farms and encourage investment in mariculture. However, each mariculture site is considered on a case by case basis. D&S IFCA's Mariculture Strategy sets out that established mariculture sites should be protected from the interaction with mobile fishing vessels. The words "established mariculture sites" has a bearing on the B&PSC's decision making regarding formally consulting on changes to the Permit Conditions to help protect these two mariculture sites.

Proposal 02: Your Response:

You can choose how to set out your response; however, the following questions (any or all) function as prompts and may help you set out your response and may help Officers to collate your views. Please provide any information that may support your view.

1. Are you a Category One Mobile Fishing Permit Holder?
2. If you are not a Category One Mobile Fishing Permit Holder, do you have another D&S IFCA Permit, or what is your main interest in this proposal?
3. Will you be impacted (positively or negatively) financially or otherwise, by the proposal to prohibit mobile fishing activity in the mariculture sites – how and why?
4. In what ways will the different fishing sectors or the environment be impacted (positively or negatively), by this change – how and why?
5. Do you have any other comments or suggestions relating to proposal 02?

Proposal 03:

- **To change the requirement relating to the transmission of IVMS data to reflect the installation of Rewire devices.**

It is proposed to amend paragraph 4.2 (b) so that Permit Holders with a Nemo (CLS UK (Fulcrum Maritime Ltd)) and a Rewire Security Vessel Monitoring Device fitted to their vessels are compliant with the requirements relating to the transmission and availability of relevant data.

It is proposed to add the words highlighted below to Paragraph 4.2 (b).

- 4.2 A permit holder or a named representative must not operate a relevant fishing vessel over 6.99 metres in overall length within the District unless:
- a) a permit holder has provided in writing a copy of the manufacturer's approved engineer's installation report for the vessel monitoring device containing the information specified in paragraph 6.1; and
 - b) subject to paragraph 4.3, the relevant data is received by the UK VMS hub, **or is received by the vessel monitoring device supplier and made available to the Authority via the supplier's platform**, at least every three minutes except when a relevant fishing vessel is within an area as defined by the co-ordinates set out in the attached Annex 13 to these permit conditions.

Explanation and Rationale

D&S IFCA relies on its ability to access IVMS data and to view the information in real time to monitor fishing activity of mobile gear vessels and provide protection to the Marine Protected Area network.

On 12th August 2025, Succorfish stopped forwarding IVMS data to the UK VMS hub and this situation continues. In response, on 18th September 2025, D&S IFCA agreed to supply and install alternative IVMS devices to those vessels that had Succorfish devices fitted on board. D&S IFCA has currently installed 38 Rewire Security IVMS devices on those vessels that had a Succorfish device fitted. It was anticipated that the MMO would accept the data from these vessels on to the UK VMS hub. The UK VMS hub is currently receiving data transmitted from Rewire IVMS devices fitted to Jersey registered and Welsh registered vessels. However, the MMO has confirmed that in respect to English registered vessels, the UK VMS hub would only receive IVMS data from either a Succorfish or Fulcrum IVMS device.

D&S IFCA did not anticipate that the situation with Succorfish would remain unresolved. The current permit conditions do not account for this situation or the refusal from the MMO to receive Rewire data from English registered vessels to the UK VMS hub.

This means affected permit holders, through no fault of their own, are unable to comply with the current permit conditions. The proposed amendments allow all permit holders the ability to be compliant with all the permit conditions relating to vessel monitoring.

D&S IFCA can access the data from the Rewire devices via the supplier's platform in a similar way that individual permit holders can view their vessel's data.

Until further notice, only those mobile gear fishing vessels that have a fully functioning Rewire or Fulcrum device on board are able to continue to fish in D&S IFCA's District.

The MMO have stated that the owners of vessels fitted with Succorfish IVMS devices must keep the devices switched on.

What do we do with your information – Privacy Policy.

We protect any personal data that you may provide. Any personal data submitted in this formal consultation will not be shared with other organisations or placed in the public domain. The content of responses will be summarised and anonymised where appropriate for documenting in reports that will be presented to the Byelaw & Permitting Sub-Committee and published on our website.

D&S IFCA has a privacy policy which can be found by visiting our website (home page) www.devonandsevernifca.gov.uk

- You can change your preferences at any time.
- We have a duty to consult with D&S IFCA Permit Holders.
- You can manage your preferences by contacting D&S IFCA.

Background Reports & Papers (Links) and keeping you informed.

Reports and Officers' papers of most significance to this review of the Mobile fishing Permit Conditions are available on D&S IFCA's website:

- [The Authority Meetings Tab](#)
- [Section B of the D&S IFCA Website Resource Library](#)

We regularly post information about our work on our website/Facebook. Direct communication is often the best way to help you stay informed about our work and to highlight the opportunities for you to have your say on a range of topics or issues. If you are not already on our mailing list, then you can get yourself added by contacting D&S IFCA. You will then be directly notified of all our consultations.

End.