Review of the Mobile Fishing Permit Byelaw 2022 Permit Conditions

A Summary of Responses from the Formal Public Consultation

(9th April 2026 to 7th May 2026)

20th May 2026

Contents

Version Control

Version & Date	Comments
Version 0.1: 14th May 2026	1st draft of report prepared. Internal review, additions, and editing.
Version 1.0: 20th May 2026	Report finalised for presentation to the Byelaw & Permitting Sub-Committee for use at their meeting on 4th June 2026

1. Foreword - This Report & its Purpose

This report (20th May 2026) has been prepared for Members of the Devon and Severn Inshore Fisheries and Conservation Authority's (D&S IFCA's) Byelaw and Permitting Sub-Committee (B&PSC) and for all stakeholders to examine via its publication on the D&S IFCA website.

This report is accompanied with an Officers' paper to inform discussion and the B&PSC's decision making relating to potential amendments to commercial (Category One) Mobile Fishing Permit Conditions. The Officers' paper, rather than this report, includes recommendations for the B&PSC relating to each of the three proposals set out in the formal public consultation.

This report demonstrates how the formal public consultation - Review of the Mobile Fishing Permit Conditions - was conducted and summarises the responses received. There was a low response to the formal public consultation consisting of 10 responses received by the closing date of midnight 7th May 2026. Every response[1] submitted by email was acknowledged by Officers who also provided additional information in email replies.

This report is intended to blend responses together to demonstrate the views, statements, and questions of those that responded and to highlight the key themes raised in the responses that were submitted by both individuals and organisations. This report includes extracts from selected responses that are set out in *purple italic font*.

If the B&PSC identify changes that are appropriate, Officers, with potential assistance of the Byelaw Technical Working Group (BTWG), will re-draft the Mobile Fishing Permit Conditions which will be re-issued free of charge to Permit holders.

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[1] Received by D&S IFCA by the closing date of midnight 7th May 2026.

2. Executive Summary of the Formal Public Consultation

The formal consultation consisted of direct notification with supporting information (a summary of the proposals) posted on D&S IFCA's website and Facebook. Direct notification included use of Mailchimp, with **2005** stakeholders receiving the formal consultation information in full.

A total of **1129** Permit holders (some with more than one permit) also received the formal consultation information in full via email with attachment. A total of **34** Permit holders with no email received the full information sent as hard copy in the post. It is unknown how many people only viewed the summary of information, rather than the information in full.

- The total response consisted of **10 responses**
- There were **10 objections to proposal (1)** (to open a new dredge fishery for razor clams in the South of the D&S IFCA's District).
- There were **no objections to proposal (2)** (introducing protective measures for mariculture sites) and three supportive comments.
- There were **no objections to proposal (3)** (change of requirements for transmission of IVMS data) and two supportive comments.

Who Responded:

The formal consultation highlighted that it would be of use for D&S IFCA Officers if every response contained 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 netting 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).

None of the responses contained answers to all three of the above questions. It is unknown how all the stakeholders that responded were made aware of the formal consultation, however the Wembury Marine Conservation Area Advisory Group confirmed notification via D&S IFCA's direct communication. It is likely that both Devon Wildlife Trust and the British Spearfishing Association also became aware due to D&S IFCA's direct notification.

The majority of responses indicated their interest group

Table 1: Interest Groups (individuals)

Interest Group	Number of Responses
Diving and Marine Environment (individuals)	6
Unknown	1

In addition to individual stakeholders, the organisations that provided a response were as follows:

1. Devon Wildlife Trust
2. Wembury Marine Conservation Area Advisory Group (Wembury Advisory Group)
3. British Spearfishing Association

Level of Detail in the Responses

All responses submitted by individual stakeholders (mainly divers) were different in how they were set out and were not a petition type of response. Officers have triaged the responses, and the points made in the simplest of responses were often repeated and expanded in other responses, in particular the responses submitted by the organisations.

The points made by both individual divers and those with an interest in the marine environment were generally covered, with additional information, in the responses submitted by the organisations, in particular the Devon Wildlife Trust and the British Spearfishing Association.

Focus of the Responses

Table 2: Number and type of comment for each proposal

Proposal	Total Number of Comments	Support/Qualified Support Comments	No comment or no strong view	Objection Comments
01: Opening of a Razor Dredge Fishery	**10**	**0**	**0**	**10**
02: Protection of Mariculture Sites	**4**	**3**	**1**	**0**
03: IVMS Data Requirement	**3**	**2**	**1**	**0**

Objections

The focus in every response was to **object to proposal (1)**, the opening of a new dredge fishery for razor clams in the South of the D&S IFCA's District. It is possible that not all stakeholders that responded read, or potentially fully understood, all of the background information set out in the formal consultation; however, the objection is still clear. How individual stakeholders demonstrated their objection differed, as did the level of detail in the responses and the subject matter highlighted in their responses.

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Simple Objections:

Individual Response 1

"Dredging is incredibly harmful to the seabed, destroying seabed ecosystem and causing damage that lasts for decades. There is extensive evidence of the unrecovered bycatch and other marine life that is killed by dredging. It is the least sustainable form of fishing. That fact that you would propose it shows just how out of touch with the evidence the department has become, and just how little regard you have for the public opinion on such matters. Shame on you. Not only do I oppose this proposal, but I would also call for a complete ban on all trawling within 50 miles of the coast".

Individual Response 2

"I am a diver of over 50 years and have seen a massive decline in life in all areas. This area seems to be far worse. A recent 14 miles round trip with 2 fish finders on showed no fish, and a half hour dive still did not see a fish. I see this trawling as the last life left remove. The trawling in this area should be stopped to let things recover not remove more".

Individual Response 3

"I'm writing to object about the proposed razor clam fishery. I'm a recreational diver/fisherman and I have seen first-hand the damage to the seafloor "small dredges" can do. These shallow areas have extensive ecological importance and considering the current state of our local ecosystems any further damage should be avoided at all cost".

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More Detailed Objections:

The remaining seven responses contained more detail. Responses from the British Spearfishing Association and the Devon Wildlife Trust were the most detailed of the responses from the organisations. Two responses from individual stakeholders also contained a significant amount of detail.

The points below capture the main themes relating to **proposal (1)** set out in the responses.

- **Confidence in the Evidence Base – Habitat**
- **Environmental Impact**
- **Selectivity/Sustainability**
- **Further Trials - A need to Build the Evidence Base**
- **Impact on Water Quality, Visibility and Across Fishing Sectors**
- **Longer Term Impacts and Recovery of Marine Environment**

Section **3.1** of this report documents these themes of objection in more detail.

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Qualified Support and Other Comments

Four of the responses referred to proposal (2), with brief messages of support, or a message from the Wembury Advisory Group that it would seem to be appropriate for the B&PSC to agree to the changes.

Three of the responses referred to proposal (3), with brief messages of support, or in the case of the Wembury Advisory Group a sentence stating that they do not have sufficient knowledge or expertise to comment in more detail.

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3. Proposal 1: (Dredge Fishery for Razor Clams)

- **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.

The Proposed Access Area

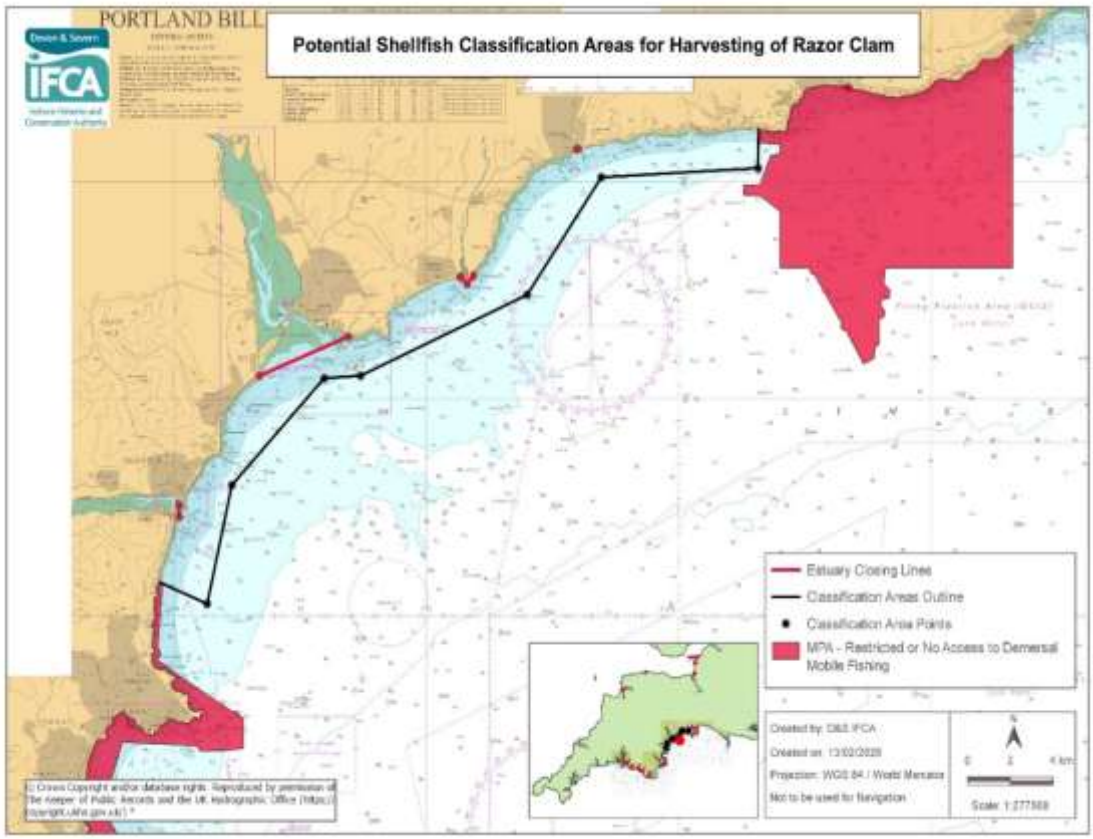


Figure 1: Proposed shellfish classification areas for the harvesting of razor clams.

- 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.

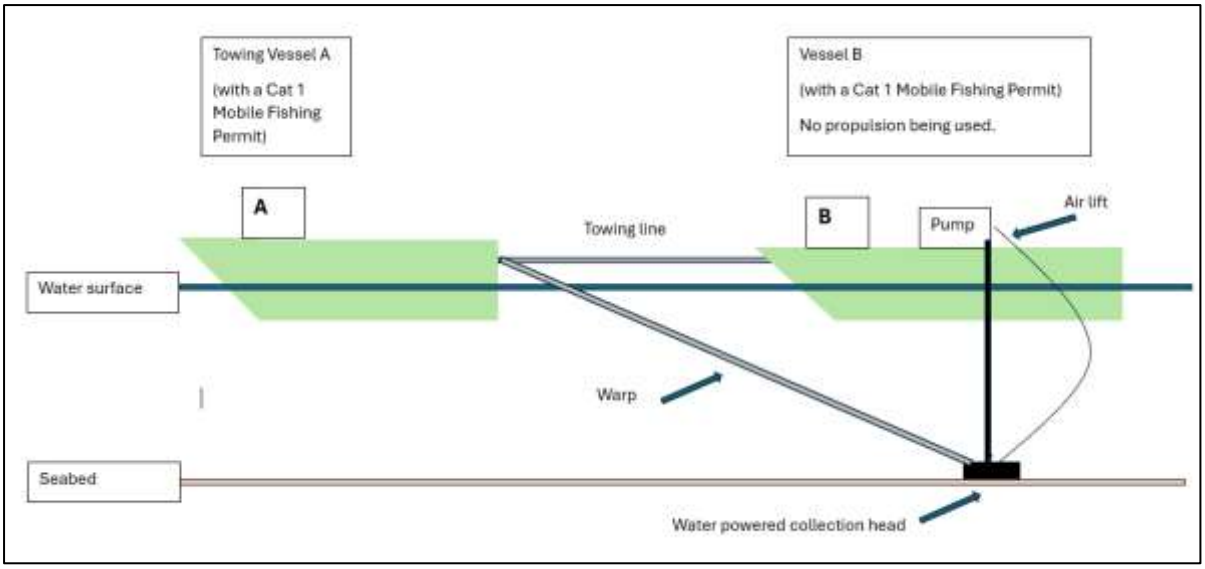
- Permit Conditions will be developed for the fitting of and use of REM, and the action that must be taken if the REM system is no longer functioning correctly or needs replacement.

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.

The Explanation and Rationale Provided in the Formal Consultation

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.

The Prompts for a Response

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?

3.1 Proposal 1: Summary of Response

All of the **10 responses** commented on proposal (1). All responses raised points of **objection**. The most detailed responses regarding proposal (1) were provided by Devon Wildlife Trust and British Spearfishing Association. Extracts from these responses feature strongly in this report as they encompass many of the concerns set out in other responses including the Wembury Advisory Group.

Support and Qualified Support

There were **no responses offering support or qualified support** for proposal (1).

Objection

The main themes of objection have been divided into topics.

Confidence in the Evidence Base - Habitat

Responses lacked confidence in the evidence base to date, in particular the assertation that the proposed areas for operation are “homogeneous” sandy habitats. The British Spearfishing Association challenged this by citing that their members have extensive experience diving these waters and can confirm that the seabed from Berry Head to Beer is far more complex that suggested in the formal consultation.

The Devon Wildlife Trust set out that there should be a pre- and post-impact survey of benthic community composition and recovery. An individual response from a diver also raised concern surrounding the habitat type in the proposed areas of operation.

Devon Wildlife Trust (DWT)

"We (DWT*) have significant concerns regarding proposal 1, and do not consider the current evidence base to be sufficient to demonstrate that the proposed fishery can be introduced without significant environmental risk".*

British Spearfishing Association (BSA)

(the proposed area)*"….contains low-lying sandstone reefs, particularly near Budleigh Salterton and Exmouth, as well as biogenic structures such as sponges and corals. These complex habitats, transitional zones, and the corridors between them function as vital nurseries for juvenile fish and shellfish".*

Individual Stakeholder (Diver)

"The proposal appears to characterise the seabed as relatively homogeneous; however, this does not align with my repeated in situ observations while diving across the proposed area. I have personally witnessed that the proposed site supports a heterogeneous mosaic of sediments and biogenic structure, with associated fauna and flora including:

- *Commercial and non-commercial bivalves: scallops, queen scallops, razor clams, cockles, and a range of other burrowing shellfish species*
- *Crustaceans: brown crab, European lobster, spiny lobster (crawfish), swimming crabs, hermit crabs, and juvenile crustaceans utilising the area for shelter*
- *Demersal and benthic-associated fish: flatfish (including plaice, sole, flounder, brill and turbot), gurnards, juvenile rays, and frequent sightings of black bream, red mullet, and bass*
- *Pelagic and bentho-pelagic visitors: grey mullet and other transient species moving through the area to feed*
- *Sessile and semi-sessile benthic fauna: anemones, soft corals, hydroids, bryozoans, tube-building worms, and sponges contributing to structural complexity*
- *Echinoderms: starfish, brittle stars, sea urchins, and other sediment-interacting species*
- *Algal assemblages: red and brown seaweeds occurring in patches where substrate allows, contributing to habitat structure, nursery function, and localised productivity*
- *Mobile invertebrates: cuttlefish, squid, octopus, and a variety of gastropods and other molluscs*

These observations indicate a functionally diverse benthic ecosystem, with both infaunal and epifaunal communities contributing to habitat structure, nutrient cycling, and trophic interactions. The presence of juvenile fish and commercially important species suggests the area may also function as a nursery or feeding ground".

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Environmental Impact

Both DWT and WAG recognised that although the fishery may cause much less surface (seabed) damage than a traditional scallop dredge, it will still result in substantial disturbance to the benthic environment, including the displacement and potential damage of infaunal communities.

All three organisation lacked confidence that the infilling of the trenches, even 'within hours', as set out in the formal consultation information, will not produce significant impact or result in the seabed being restored to its pre-disturbed condition. The view is that the ecological

recovery of such systems operates on significantly longer timescales than sediment redistribution alone. The Wembury Advisory Group commented that the size of razor clams targeted by the fishery and their burrowing ability means that considerable seabed disturbance will be required for the technique to be effective, with the release of large quantities of organic material in addition to the displacement of fauna. Sperate responses from individual stakeholders also raised concerns regarding impact to the marine environment.

British Spearfishing Association (BSA)

"The proposed "razor clam dredge" penetrates up to 40cm into the substrate. This deep-penetration method is arguably more destructive to the vertical structure of the seabed than even traditional trawling. The claim that these trenches will "infill within hours" fails to account for the destruction of the infaunal communities and the long-term destabilisation of the benthic environment. The ecological recovery of such systems operates on significantly longer timescales than sediment redistribution alone".

"Furthermore, the reliance on Remote Electronic Monitoring (REM) is a reactive measure that cannot prevent the physical destruction of a reef once the dredge has already passed over it".

Devon Wildlife Trust (DWT)

"We (DWT) *also note that the evidence presented suggests that sandy habitats are resilient to disturbance and that dredge tracks may infill rapidly. However, physical infilling does not equate to ecological recovery. Natural disturbance processes (e.g wave and tidal action) are also not directly comparable to constant, spatially targeted fishing activity, particularly where effort may be concentrated".*

Wembury Advisory Group (WAG)

"Although the proposed method should cause much less surface damage than a scallop dredge, it will still disturb the entire benthic community with many buried animals lifted to the surface of the sediment where they will be available to scavengers and predators. More fragile animals will be damaged by the technique itself".

Individual Stakeholder (Diver)

"I anticipate negative impacts. Razor clam dredging is a high-impact, bottom-towed fishing method associated with:

- *Significant sediment mobilisation and turbidity plumes*
- *Penetration and disruption of infaunal communities*
- *Damage to emergent epifaunal structures and biogenic habitats*
- *Bycatch and mortality of non-target species*
- *Potential alteration of sediment composition and community recovery trajectories*

Given the ecological complexity described above, such impacts are unlikely to be spatially or temporally limited, and may result in cumulative degradation of habitat quality".

Individual Stakeholder (Diver)

"I am strongly against this fishery. It will add another huge pressure on the seabed environment in areas that are very close to shore, these areas hold an abundance of micro habitats and species that reside on the seabed and are also yet to be commercially exploited. They have been sheltered (close to shore) from the already destructive bottom trawling, for scallops or bottom dwelling fish species for long periods of time and provide a good food source for a range of species.

Dredging the bottom for razor clams will be adding to the pressure that the bottom trawling fleet already does, which is extremely significant. I can evidence this first hand with the fact

that there are almost no flatfish (plaice/sole/turbot) found in areas where they were very abundant 30-40 years ago, with zero signs of recovery. When these bottom dwelling fish are caught, they are all significantly smaller when compared to catches made in this time".

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Selectivity/Sustainability

British Spearfishing Association

We note with concern that during the reported IFCA trials, 34% of the razor clams caught were under the minimum conservation reference size and that modifications were constantly required to reduce "damage to bycatch species". This suggests that the gear is not yet sufficiently selective, and directly contradicts the Authority's mandate to ensure sustainable exploitation.

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Further Trials - A need to Build the Evidence Base

Although Devon Wildlife Trust are supportive and the development of lower-impact fishing methods, it is their view that the current proposal relies too heavily on assumptions regarding the razor dredge fishing method being low impact without additional supporting evidence.

Devon Wildlife Trust stated that they are supportive of additional onboard surveys to assess catch composition and bycatch. In their response they highlighted that species such as *Echinocardium cordatum*, that the research work has identified are taken as a bycatch, are important bioturbators (De Ridder and Saucède, 2020) that contribute to sediment structure and ecosystem functioning.

It is the view of Devon Wildlife Trust that their repeated disturbance or removal may therefore have wider ecosystem consequences. It was recognised that gear adaptions may reduce damage to both target species and non-target species; however, the evidence base remains limited in spatial and temporal scope and that the findings of research indicate that further gear refinement is required.

Devon Wildlife Trust commented that they would like to see more evidence gathering relating to the following

- Quantification of bycatch rates across seasons and environmental conditions
- Information on post-capture and release survival of bycaught species
- Assessment of cumulative effects under repeated or scaled-up fishing effort

And more broadly it was the view of Devon Wildlife Trust that there is insufficient information presented on:

- The composition and sensitivity of benthic communities within proposed fishing areas
- The extent and persistence of sediment plumes generated by jetting activity
- The implications for carbon storage

It is the view of Devon Wildlife Trust that without understanding these factors, it is not possible to fully assess the environmental risks associated with this proposal and therefore if the B&PSC decide to progress this proposal, they recommend that it is implemented as a precautionary, time-limited trial, with clearly defined spatial and effort limits. Furthermore, it is the view of Devon Wildlife Trust that a comprehensive monitoring plan should be in place from the outset, including:

- Quantitative assessment of bycatch and damage rates (target and non-target species)

- Pre- and post-impact surveys of benthic community composition and recovery
- Assessment of sediment disturbance, including plume dynamics and deposition
- Evaluation of cumulative impacts over time

Devon Wildlife Trust set out that the monitoring should be supported by a transparent adaptive framework, with clear thresholds for intervention, including the suspension of the fishery if unacceptable impacts are identified.

Regarding trials, the Wembury Advisory Group had a similar view that if the fishery is to go ahead, robust monitoring must be in place from the outset to address all relevant parameters including, but not limited to, bycatch of and damage to razor clams and non-target species.

Individual Stakeholder

"The classification of the area as "homogeneous" should be revisited and supported by ground-truth survey data, including diver observations where appropriate".

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Impact on Water Quality, Visibility and Across Fishing Sectors

Both the British Spearfishing Association and an individual stakeholder (diver) raised concern regarding this topic. Both responses highlighted that dredging will result in stirring up of silt and will cause sand to be in suspension, impacting visibility, water quality, and water clarity in areas near the shore.

British Spearfishing Association (BSA)

"Frequent dredging will create persistent sediment plumes, significantly reducing visibility. This will not only impact the biological health of the area (e.g., by smothering reefs, and reducing primary productivity) but will also displace the spearfishing and recreational diving sectors, effectively prioritising one high-impact commercial operation over multiple sustainable, low-impact users".

It is the view of the British Spearfishing Association that the opening of the razor dredge fishery will create a direct conflict between a high-impact, short-term fishery and existing sustainable methods and urged D&S IFCA to adopt a precautionary approach.

"If a razor clam fishery is to be established, it should be restricted to hand-harvesting by divers. This method is proven to be commercially viable (e.g. in the Scottish Model, Marine Scotland), is 100% selective, has zero impact on the seabed, maintains water visibility, and provides a higher-value "niche" product that aligns with the IFCA's duty to ensure sustainable exploitation".

Individual Stakeholder (Diver)

"As a diver operating in this area, I depend on stable seabed conditions, good visibility, and intact benthic communities to effectively and selectively harvest shellfish. From a fisheries perspective, this introduces clear conflict:

- *Diving and hand-gathering sectors rely on intact habitats, species diversity, and visibility*
- *Static gear fisheries may be affected by displacement, gear conflict, and reduced stock productivity*
- *Mobile gear operators may gain short-term access, but at the cost of longer-term ecosystem resilience*

- *The proposal therefore risks privileging a high-impact, short-term extraction method over lower-impact, more selective, and potentially more sustainable practices".*

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Longer Term Impacts and Recovery of Marine Environment

Devon Wildlife Trust

"…..the introduction of a new fishery involving active seabed disturbance appears inconsistent with wider environmental objectives. Any new fishery should demonstrate a clear net benefit, for example through the replacement of more damaging activities or through strong evidence of genuinely low ecological impact".

The Wembury Advisory Group had a similar message.

Wembury Advisory Group

"Seabed habitats need stronger protection to enable ecosystem recovery and maximise overall productivity of ecosystems. We consider this should preclude the development of new fisheries that will damage them. Any new fishery should result in a net benefit to the environment by replacing or adapting an existing one".

Individual Stakeholder

"We should be championing more areas to have no destructive bottom fishing in our local areas (like Sussex), giving these types of bottom dwelling fish some shelter/rest bite in an environment that is heavily over fished. Not adding more pressure to it by taking their food source away and simultaneously damaging the seabed along with disrupting all the other species that reside there, I also assume a high mortality rate and discard for the species that do not have a high commercial value which are unfortunate enough to get vacuumed to the surface".

"I am a generational spearfisherman/freed diver who lives in Dawlish, I have a great understanding and knowledge of our local waters. I have firsthand accounts from my father of how things used to look with regards to bottom dwelling species in the 60's/70's and feel that this new fishery will only enhance the pressures on this type of environment, when we should be striving to get it to how it used to be. (The proposal is*) adding further pressure to the surrounding ecosystems. It feels like we are going backwards not forwards, whilst not taking into consideration any conservation measures".*

Individual Stakeholder

"This (potential new razor dredge fishery) *adds yet another layer of stress to marine life and the broader ecosystem. Overall, this proposal risks causing disproportionate and potentially irreversible harm to seabed habitats and the species that depend on them. It prioritises short-term gain over long-term environmental sustainability, and I strongly urge that it be reconsidered".*

4. Proposal 2: (Mariculture Sites – Protective Measures)

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- **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

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 Provided in the Formal Consultation

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.

The Prompts for a Response

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?

4.1 Proposal 2: Summary of Response

There were four responses that referred to proposal (2). In their response relating to proposal (2), the British Spearfishing Association also highlighted concerns regarding proposal (1).

Support and Qualified Support

Devon Wildlife Trust simply stated that they support proposal (2). The Wembury Advisory Group had no comments as such, other than the proposal to introduce protective measures appears to be appropriate. The other supportive messages are sown below, with the response from the British Spearfishing Association also referencing proposal (1).

Individual Stakeholder

"I am generally supportive of mussel farms, as they can increase habitat complexity and provide structure that supports fish and invertebrate communities. I therefore have no objections and support this proposal".

British Spearfishing Association (BSA)

"The BSA supports the principle of spatial management and the prohibition of demersal mobile fishing within defined areas to protect sensitive installations or habitats. However, we find it contradictory that the Authority recognises the need to protect mariculture sites from mobile gear while simultaneously proposing to introduce a high-impact dredging operation into the wider marine environment. We recommend that the same level of protection afforded to these mariculture sites be extended to the sensitive sandstone reefs and transitional zones identified by our members".

……

Objection

There were **no objections** to proposal (2).

……

(intentionally blank)

5. Proposal 3: (Transmission of IVMS Data)

- **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.

The Explanation and Rationale Provided in the Formal Consultation

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.

The Prompts for a Response

There were no prompts for a response; however, stakeholders were encouraged to explain the reasons for their views and to provide supporting information, if they had any, so that all the information can be considered in the decision-making process.

5.1 Proposal 3: Summary of Response

Three responses referred to proposal (3) in their submissions. The Wembury Advisory Group stated that they do not have knowledge or expertise to make any comment.

Support

Comments were provided from one individual stakeholder and the Devon Wildlife Trust.

Individual Stakeholder

"I have no concerns regarding this proposal and support its implementation".

Devon Wildlife Trust (DWT)

"DWT supports this proposal".

……

Objection

There were **no objections** to proposal (3).

……

6. Communication & Outreach

Overview

The Formal Public Consultation began on 9th April 2026 and ended on 7th May 2026. The full version of the formal consultation was directly circulated to over 2000 contacts on the D&S IFCA contact data base. This included all D&S IFCA Byelaw and Permitting Sub-Committee Members.

- 2005 people received the information via the Mailchimp Platform.
- 1316 people opened the Mailchimp email.
- 1129 Permit holders with an email address were sent the information as an email attachment.
- 34 Permit holders were sent the consultation information in hard copy.
- The most popular hyperlinks to D&S IFCA's website within the formal consultation were to view the Authority & B&PSC Meetings page and the Our Members page.

In addition to the Mailchimp circular, a news item was produced for the website which was duplicated on Facebook setting out a summary of the five proposals. The blog news item was taken off display after the consultation ended. The news item (pdf) can be viewed **here**.

The key information about the formal consultation was placed on the "Engagement & Have Your Say" website display page for the duration of the formal public consultation.

The circulated information explained the purpose of the formal consultation, a summary of the proposals, information about process (including links), prompts to help people respond, and then the five proposals set out in more detail including specific management measures and rationale for the proposals. A privacy notice explained how personal data is protected and how it would be used. The pdf version of the formal consultation can be read **here**.

The application forms to gain a permit provide fisher with a choice not to provide an email address for communication. All permit holders that have not provided D&S IFCA with an email address were sent the full formal consultation information in the post. The cost to the Authority of sending hard copy information was £61.

Options were provided for engagement as follows:

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)

Effectiveness of D&S IFCA Communications

Although the response (10 responses) was very low, the communications approach exactly mirrored D&S IFCA's formal consultation for changes to the Netting Permit Conditions undertaken in 2023/2024 which resulted in 364 separate responses.

The consultation did not appear to generate widespread interest, for example additional articles in newspapers or the television. One respondent (a diver) did say they heard about the consultation via a Facebook group.

Officers have the view that the relativity low response rate is far more likely to be reflection on the substance of the formal consultation rather than any aspect of D&S IFCAs approach to its communications.

End.