

Amendments to the Mobile Fishing Permit Conditions – Proposal (1)

Officers Recommendation

That Members agree that the razor dredge fishery is opened subject to a Monitoring and Control Plan being implemented and to the following permit conditions:

- 1. Design of dredge (interpretation);**
- 2. Areas fished (within the area outlined in Figure 2 as an Annex); and**
- 3. Installation on board of a REM system that remains fully functional at all times.**

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

Background

The formal consultation set out the proposal to introduce a series of Category One Mobile Fishing Permit Conditions to regulate a new razor clam dredge fishery. This would include defining the fishing gear to be used, spatial management, and the use of Remote Electronic Monitoring (REM) to monitor the fishery.

The proposed razor clam fishery would take place in areas currently open to trawling and scallop dredging. The proposed access areas for the razor clam fishery were set out on a chart as shown below.

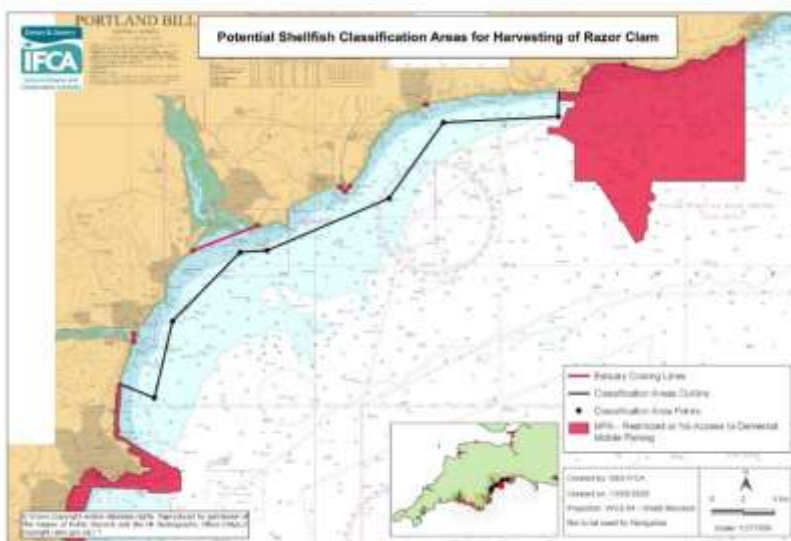


Figure 1: Proposed shellfish classification areas for the harvesting of razor clams.

The proposal for formal consultation set out that:

- 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 recognised the need to monitor this new fishery if it is authorised to take place. The proposal included a requirement that Remote Electronic Monitoring (REM) is fitted to the fishing vessel, as a Permit Condition, so the fishing activity can be fully monitored. The formal consultation set out that 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.

The formal consultation also set out that 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.

In addition, 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 Consultation Response

Support and Qualified Support:

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

Consideration by B&PSC:

Objection

The main themes of objection have been divided into topics and addressed by Officers.

Confidence in the Evidence Base - Habitat

The fishery will take place over sandy habitats that are characterised by poor biodiversity. The trials that have been undertaken show very few species being brought to the surface. The invertebrate population of the sediment is unknown, but the habitat is a relatively harsh environment and will have less infaunal richness compared to other substrates.

Figure 2 shows the extent of the proposed fishery. However, areas within the zone highlighted in black will need to receive shellfish classification status by the Fish Health Inspectorate. Due to the requirement for monthly monitoring of shellfish quality, it is very likely that the classified areas will be much smaller than indicated in Figure 2.

In addition to the potential shellfish classification area restrictions, the fishery will be restricted because the dredge design is not suitable for substrates other than sand and will not be effective in catching razor clams in other substrates.

The proposed on-board REM system will monitor the catch coming aboard the vessel and will be able to determine the type of sediment such as sand, mud and gravel on which the fishing is taking place. The habitat type can be determined through examination of the footage from the REM and on-board surveys undertaken by D&S IFCA Officers.

Environmental Impact

The area set out in Figure 2 is currently open to mobile fishing (trawling and scallop dredging) vessels, that operate under a D&S IFCA Permit. These are areas that have been fished by towed gear for generations. The habitat has already been modified by this fishing activity, and the features and habitats have not be designated as Marine Protected Areas.

The razor clam dredge will reach a maximum of 40 centimetres to catch the razor clams intact. The fishing activity will take place at very low speeds enabling any mobile species to avoid capture. The footprint of the dredge is only one metre wide so the area subject to fishing pressure is relatively small compared to other demersal towed gears.

It is accepted that the proposed razor dredge fishery, as with most other fishing activity, will change the habitat and the abundance of species present, but no razor dredging is proposed within more sensitive and important habitats located within the MPA network.

Selectivity/Sustainability

From surveys undertaken in 2025 the razor clam dredge only catches razor clams, other clams, and the occasional echinoderms and crabs as bycatch. The gear itself is selective in terms of the size of species caught. Smaller organisms are released at the dredge head

whilst it is on the seabed. Selectivity comes from the habitat on which the dredge operates, where fewer species are found. It is not in the operators interest to catch non-target species or undersize razor clams.

REM would record the catches and allow monitoring of any bycatch. REM, together with on-board surveys, would verify the selectivity of the operation, the level of bycatch and as previously mentioned the habitat type. REM can be used to assess the catches, and when combined with landings data, will allow for the assessment of Catch Per Unit effort (CPUE) and Landings Per Unit Effort (LPUE), which will provide information on stocks and sustainability of the fishery.

Further Trials - A need to Build the Evidence Base

The proposed fishery does rely on a robust Monitoring and Control Plan to be in place and will be supported by the onboard REM system. Regular reports on the fishery will be provided to the Authority for consideration after the fishery has commenced. If the evidence is that the fishery is not sustainable, including from an environmental or bycatch perspective, the Authority has the ability to close the fishery.

The fisher has worked closely with both D&S IFCA and CIFCA to trial the razor dredge system prior to fishing commercially. The fisher has indicated that they are willing to fully engage with the Authority's Officers to ensure that the fishery is sustainable. In order to assess the fishery further, the operation must be on a commercial basis to properly assess potential impacts outside of the context of the gear trials.

Officers understand that there is a low likelihood that the fishery will expand beyond one operator and one vessel in the next few years due to the complexity of the set up and gear design. This provides the Authority sufficient time to assess the impact of the fishery on the marine environment and determine whether the razor dredge proves to be a viable and sustainable method.

Impact on Water Quality, Visibility and Across Fishing Sectors

The trials to date show that the dredging activity does create a plume, but the scale of the suspended sediment is limited to the immediate vicinity of the vessel. The concerns raised by respondents regarding smothering of other features is not considered to be significant.

The areas where the dredging activity can take place are open to other demersal fishing activity which cause disturbance to the seabed, and it is highly unlikely that these areas would be suitable for diving activity.

Officers do not believe that additional conflict between fishing sectors will arise due to one more mobile gear operator.

Longer Term Impacts and Recovery of Marine Environment

D&S IFCA's duties include seeking 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.

The priority for the respondents is to protect the marine environment, and they have report a decline in the fish stocks and deterioration of the marine habitat.

D&S IFCA has dedicated considerable time and resources to protect the marine environment in its District. Currently 40% of the South of the D&S IFCA's District is closed to demersal fishing gear. Officers have undertaken impact assessments and D&S IFCA has introduced spatial closures to allow for marine protection and recovery in these closed areas.

Natural England, through their position on the Authority, has been fully aware of the proposal and the trials that have taken place, and have provided no response through the public consultation to object to the activity moving to a commercial fishery.

It is the Officers' view that although there were points of objection raised in the formal consultation, there are sufficient safeguards in place including detailed monitoring to allow the fishery to be opened subject to regular review.

The Permit Conditions can be amended and circulated to apply from 1st July 2026.

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Background Papers

B&PSC Papers and meeting minutes ([Section B of D&S IFCA Website Resource Library](#)) and Agenda Item 7 (Annex A) – A summary of Response from the Formal Consultation