Advice from Natural England

1. Background

On 17th June 2026 Officers received advice from Natural England (the Government's Statutory Nature Conservation Body). This advice has had a bearing on the development of a M&CP to accompany the potential opening of a razor clam fishery. At the Authority meeting held on 18th June 2026, Kate Sugar (Marine Senior Officer from Natural England) provided Members with a verbal account of the advice. The advice received from Natural England was circulated to all Authority Members on 19th June 2026.

2. The Advice

The advice from Natural England is transcribed below in purple font.

We welcome the discussion around the proposal for the introduction of a new dredge fishery for razor clams in the South of the D&S IFCA District, and the diligence of the IFCA in its close consideration of the proposal, and appropriate management measures should the fishery be opened.

The following information outlines Natural England's recommendations on this proposal, to provide transparency to members of the IFCA, the Committee and the Byelaw & Permitting Sub Committee.

1. Clarification of statutory position

Our understanding is that the proposed fishing activity would be prohibited within Marine Protected Areas (MPAs) and therefore would not directly impact any designated MPA sites or features. Therefore, Natural England's statutory duties around MPA protection are not triggered in this case.

Natural England can provide wider seas conservation advice (for example in relation to Good Environmental Status (GES) and the ecosystem objectives of the Environment Act), although there is no statutory obligation to do so (unless requested). Furthermore, there is no requirement for decision-makers to seek out or take account of this advice.

This letter outlines Natural England's wider conservation advice. Providing such advice is relevant where there is a risk of wider environmental impact. IFCAs are bound by their duty to manage sea fisheries resources sustainably (see below). They are also subject to a requirement to consider the wider marine environment (including Good Environmental Status) and to operate in accordance with the core statutory objectives of the Fisheries Act (2020). Particularly relevant objectives for this proposal include the sustainability objective, the precautionary objective, and the ecosystem objective. Taken together, this suite of duties and responsibilities supports a precautionary approach to introducing and managing any new fishery.

2. Sustainable management of sea fisheries resources

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. Previous concerns around the sustainability of razor clam exploitation have been raised in multiple regions (Scotland, Wales, Ireland), and there is evidence of previous over-exploitation from similar hydraulic dredge fisheries. It is therefore prudent to consider the factors that leave razor clams open to such sustainability concerns and ensure that any management brought in (should the fishery be opened) can adequately address these concerns.

Biological constraints

Razor clam stocks are inherently vulnerable to over-exploitation. They are relatively long-lived organisms, with a lifespan often over 10 years (and reported up to ~25 years for Ensis siliqua). Growth is relatively slow, and it can take several years for individuals to reach maturity. In addition, recruitment is intermittent and unpredictable.

Distribution is patchy and localised, and very dependent on suitable habitat. Razor clams preferentially inhabit clean fine sands with sufficient depth (>30cm), typically at shallow to moderate depths. Populations are age-structured i.e. young and old individuals are not normally found in the same location. The patchy, localised nature of their distribution and defined habitat preferences can mean that fishing effort is likely to concentrate on a small number of productive beds, which presents a risk of local depletion and a propensity for a boom-and-bust pattern of exploitation in the absence of appropriate management. Due to the life history characteristics mentioned above (relatively slow growing and long lived), recovery periods for exploited populations may be several years.

Any system of adaptive management proposed for this fishery should therefore consider the specific biological constraints for this species (see suggestions in section 4 below).

3. Wider seas considerations: Good Environmental Status

Good Environmental Status (GES) is the legal benchmark for the health of UK seas, defined as an ocean state that is ecologically diverse, clean, healthy, and productive. It requires that marine resources are used sustainably so current and future generations can benefit, while safeguarding the marine ecosystem. In the UK, the UK Marine Strategy (UKMS) measures progress towards GES across 11 key environmental descriptors (indicators). The UKMS provides the overarching framework for achieving GES, setting out how we will measure, assess and respond to the state of our seas. All public bodies (including IFCAs) must have regard to the UKMS when making decisions (Reg 9 of Marine Strategy Regulations 2010). The most recent updated assessment (UK Marine Strategy Part One) reports against the high-level objectives outlined for achieving GES. The relevant high-level objective for benthic habitats is "The health of seabed habitats is not significantly adversely affected by human activities."

It is recognised that reaching UKMS targets will require action beyond the designated features of MPAs, and beyond MPA boundaries. Of relevance here is the risk of failing GES objectives due to impacts on benthic habitats outside MPAs. The current assessment shows that we are not achieving these targets, particularly due to fishing-related seabed disturbance. There is therefore a recognised need for coordinated action across fisheries management, including activity outside MPAs.

Habitat impacts

Hydraulic/suction dredging can disturb sediments to significant depths, potentially deeper than other mobile gears including scallop dredging. The proposal states that "The razor clam dredge will reach a maximum of 40 centimetres to catch the razor clams intact" which means that there will be an unprecedented level of penetration of the sediment from fishing gear in the areas where the fishery operates. The impacts of this type of fishery can also affect benthic communities beyond the target species. These factors mean that this activity type can contribute to failure to meet benthic habitat objectives under GES. Significant concerns about wider benthic habitat impacts were raised in a number of recent responses to the public consultation on this fishery. We advise that these are taken into account when considering management should the fishery be introduced.

Natural England's summary advice on key elements to consider when designing management and monitoring for this activity in order to control and minimise habitat impacts is as follows[1]:

- **Habitat type:** Habitat impacts will likely be greater in areas of more sheltered and less mobile sediment, and recovery would take longer in these areas vs the more high energy locations for the gear trial where it was reported that dredge trenches were infilling within hours. It is also important to note (as raised by several respondents to the consultation) that the ecological recovery of these sediment habitats, even in exposed locations, operates on significantly longer timescales than sediment redistribution alone. Restricting the fishery to areas of more exposed, mobile sediment would help to lessen its overall impact.

- **Bycatch and wider habitat impacts:** Fragile animals may by damaged by hydraulic/suction gear. Buried animals will be lifted to the surface where they may suffer increased predation. There may be wider impacts from the bycatch (removal) of other organisms. Monitoring of bycatch rates (and species) during the operation of the fishery will be an important source of information to feed back

[1] More detailed information can be found in our Conservation Advice Packages at https://designatedsites.naturalengland.org.uk/MarineAdviceAndEvidence.aspx

into the adaptive management of the activity. Where possible, this should include monitoring 'bycatch' of species that are exposed but not lifted onto the boat.

- **Opening unexploited areas to towed gear:** Despite the fishery only being permitted to operate in areas already open to towed gear, there is concern that the specific geographical locations targeted by this activity would be different to those currently exploited by other forms of towed gear. This may result in impacts to areas that up to now have been able to recover from previous habitat damage. Whilst this does not impact MPA protection there are implications for wider nature recovery that should be considered: where possible the fishery should be restricted to areas that are demonstrably already exploited by other forms of towed gear.

- **Size of the area open to new fishery:** The consultation documents showed the large, proposed shellfish classification area. It is understood that should the fishery go ahead, it would not operate across this whole area, however, further definition of a restricted area within which it could operate initially would be helpful.

4. Management considerations

We welcome the IFCA's proposal to put in place a robust Monitoring and Control Plan, and plan for adaptive management, from the outset. We recommend setting out management objectives clearly, and planning for comprehensive monitoring of the fishery alongside frequent review in order to facilitate true adaptive management.

We welcome the proposal for requiring REM and catch/effort reporting to contribute to initial stock assessments. Catch and bycatch monitoring will also be important to analyse impacts of the fishery.

Taking into account the biological constraints of the target species, and wider environmental concerns around potential habitat impacts, Natural England advise that management of this fishery should consider:

- Limiting effort/ catch within the fishery: starting with a more limited, trial fishery with the potential to expand from there should the fishery prove sustainable over time
- Investigating and avoiding the spawning season for targeted razor clam species e.g. a requirement for the fishery to cease when spawning is first apparent and resume following recovery of condition after spawning
- Increasing the minimum landing size (MLS) – current national Minimum Conservation Reference Size (MCRS) for all Ensis spp. is 100mm. Evidence suggests this is too low for at least some species of razor clam (particularly

E.siliqua), and a larger MLS of 140mm plus would be more appropriate. The operator has informed D&S IFCA that they intend to target a market with a minimum landing size of 180mm so it would seem eminently feasible to set a MLS for this fishery at a more sustainable level, above the current national MCRS.

- Limitation of area(s) open to this fishery within the wider shellfish classification area: start small and expand from there if the fishery proves sustainable over time.
- Limit areas open to the fishery to areas that are already open to (and fished by) other towed gear (e.g. using iVMS tracks to define these areas).
- Exclude sensitive habitat types from areas open to the fishery e.g. sensitive habitats like sandstone reef. Areas open to the fishery should be higher energy, more mobile sandy habitats with the highest potential for recovery.
- Taking a zoned approach – clearly defining areas for the fishery to operate within, and considering application of closed areas/ rotation system

Recommendation

Natural England recommends that, if the fishery is progressed, it is done so under a clearly defined, precautionary management framework with monitoring, adaptive management, and safeguards to ensure alignment with wider environmental objectives. Robust adaptive management provides the opportunity to effectively monitor and respond to potential impacts associated with this new fishery.

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LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Background Papers

Full Authority minutes (final V1.0) – from 18th June 2026

End.