

Consultation on New Controls in the Queen Scallop Fishery in ICES Divisions VIa and VIIa

Summary of Responses

August 2017

Consultation on New Controls in the Queen Scallop Fishery in ICES Divisions VIa and VIIa

Summary of Responses

August 2017

CONTENTS

	Page
Introduction	1
Analysis of Consultation Responses, Part 1: Management Measures Advocated by the Working Group	3
– Proposal 1: Increasing the Minimum Conservation Reference Size (MCRS) of Queen Scallops	3
– Proposal 2: Introduction of a Closed Season for Queen Scallops	5
– Proposal 3: Entry Restrictions for the Queen Scallop Fishery	7
▪ Entry Restriction Options – Qualifying Period	8
▪ Options for Entry Requirements	9
Analysis of Consultation Responses, Part 2: Additional Management Options for Consideration in the Medium to Long Term	11
– Proposal 4: Effort Restrictions	11
– Proposal 5: Introduction of Quotas for the Queen Scallop Fishery	13
– Proposal 6: Introduction of Closed Areas for the Queen Scallop Fishery	14
– Proposal 7: Introduction of Gear Specific Management in the Queen Scallop Fishery	15
Next Steps	16
List of Consultation Respondents	16

INTRODUCTION

This report summarises the responses to the *Consultation on New Controls in the Queen Scallop Fishery in ICES Divisions VIa and VIIa*. Stakeholders' views on each of the management proposals in the consultation are examined, with common trends and issues highlighted as appropriate.

Background

The UK queen scallop fishery is worth approximately £6 million per year, helping to sustain jobs in many coastal communities where other forms of employment may not be readily available.

There have been concerns in recent years for the health of the queen scallop stock, with the Isle of Man fishery having its Marine Stewardship Council (MSC) sustainability certification suspended in 2014 in response to stock assessments that showed reduced biomass. Concerns have also been raised regarding the level of fishing activity (effort) in the wider fishery.

As a result of correspondence from queen scallop fishermen and processors, a working group was formed consisting of fishermen, processors, scientists, and the UK Fisheries Administrations. The working group's aim has been to assess the current status of the fishery and, if appropriate, develop management measures and reduce long term risk.

Consultation

Following significant discussion, the working group agreed to consult on new management measures for the queen scallop fishery in ICES Divisions VIa (north coast of Northern Ireland and western Scotland) and VIIa (Irish Sea).

The consultation sought views on two sets of proposals. The first of these were management measures that the working group considered should be introduced in the short term to help ensure the sustainability of the stock:

- Increasing the minimum conservation reference size (MCRS)
- Introducing an annual closed season
- Introducing limits on the number of vessels able to prosecute the fishery, specifically via entry restrictions.

The second set of proposals consulted on were longer term management options. These were measures that had either not been supported by the working group for introduction in the short term, or would require the development of more specific proposals:

- Effort reduction measures (restricting time that vessels can fish)
- Catch quotas
- Closed areas

- Gear-specific management

It was not intended for these additional measures to be introduced as a direct result of the consultation, but it was felt that stakeholders' views would help to inform future considerations for the fishery.

Respondents

The consultation was launched on 11 October 2016 and ran for a 12-week period, closing to responses on 3 January 2017. There were 35 respondents, consisting of 18 private individuals (51%) and 17 organisations (49%).

Respondents break down by type as follows:

Respondent Type	Number	%
Private Individual	18	51%
Fish Processor	5	14%
Fishermen's Association	3	9%
Producer Organisation	3	9%
Conservation/Environmental	3	9%
Other	3	9%
Total	35	100%

Most respondents had a relevant interest in the queen scallop fishery. The majority of private individuals were fishermen, or had a scientific or conservation / environmental background; while organisations were mainly a mix of fishing associations, producer organisations ('POs'), fish processors, and conservation / environmental groups.

A copy of the consultation document, along with published responses, is available at <https://consult.scotland.gov.uk/marine-scotland/queen-scallop-consultation/>.

ANALYSIS OF CONSULTATION RESPONSES, PART 1: MANAGEMENT MEASURES ADVOCATED BY THE WORKING GROUP

This section summarises responses to the first part of the consultation, which sought views on management measures that the queen scallop working group had agreed should be introduced into the fishery as soon as possible.

Proposal 1: Increasing the Minimum Conservation Reference Size (MCRS) of Queen Scallops

Views were sought on whether the MCRS of queen scallops should be increased, in order to give queen scallops an additional opportunity to grow and reproduce before being landed. An EU-set minimum size of 40 mm currently applies in UK waters, while a 55 mm size is in force in Isle of Man territorial waters.

1. Do you support increasing the MCRS of queen scallops in ICES divisions VIa and VIIa?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	32	94%
b) No	2	6%

Nearly all respondents supported this proposal, with only two not being in favour. Most respondents cited the stock conservation benefits as being their main reason for supporting increasing the MCRS:

“Increasing the MLS would enable stock recovery and It would also help minimise impact on grounds. By having more larger animals present there would also be an overall increase in fecundity of the population.” [Individual respondent]

Only one of the respondents opposed to the proposal chose to comment, expressing concern that increasing the MCRS would have a financial impact on their business:

“It would be very costly to my operation unless grant aid was available.” [Individual respondent]

2. If Yes, what size should the MCRS be increased to?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) 50 mm	13	43%
b) 55 mm	9	30%
c) 60 mm	8	27%

Increasing the MCRS to 50 mm was the most popular option chosen by supportive respondents, which included POs, processors and fishing associations. Several commented that vessels were already landing at this size, while others said they were open to further size increases in the future:

“Some boats have already applied a 50 mm limit and the quality is far better for processing and worth more to the fishermen.” [Isle of Man Seafood Products Ltd]

“If stock recovers sufficiently the minimum size could be increased again to 55 mm.” [AM Seafoods Ltd]

A majority of supportive respondents favoured increasing the MCRS to a size greater than 50 mm, sharing the opinion that a larger size would be more beneficial for stock conservation. However, views were split between 55 mm (chosen by a number of individual respondents) or 60 mm (preferred by conservation groups):

*“I believe the smaller queenies should be left to grow and spawn a few times, as well as increase in yield when eventually caught and processed.”
[Individual respondent – for 55 mm increase]*

“In terms of protecting the species, we would look to having as a large an MCRS as is practicably feasible.” [National Trust for Scotland – for 60 mm increase]

3. What impacts would increasing the MCRS of queen scallops have on your business? What would the likely costs be?

Views were also sought on the potential costs for businesses as a result of increasing the MCRS. Most respondents commented that, while it may cause a short term reduction in catches, it would have a positive impact on the stock in the longer term and increase the consistency and quality of product landed:

“Initially there may be some smaller catches, but the long-term effect on the fishery should be positive.” [Scottish Fishermen’s Federation]

“It would improve the fishery and make it more sustainable and far better for the sales of the goods with a consistent and higher MCRS.” [Isle of Man Seafood Products Ltd]

“Most queen scallops are of more than 50 mm, but there may be economic incentive for fishermen to keep them when below 50 mm, despite the fact that the processors don’t want them and the price is lower. At and above 50 mm the processors will get the product they want and a better price should be reflected.” [South Western Fish Producer Organisation Ltd]

A few respondents highlighted particular negative impacts for their business, including a potential decrease in profitability from a reduction in catches, and the expense of re-gearing to target larger queen scallops:

“First few years catch decrease and less profit if any out of job.” [Individual respondent]

“The increase in size would require new gear for fishing as ring size would need to increase and new shakers and riddles aboard vessel.” [Individual respondent]

Proposal 2: Introduction of a Closed Season for Queen Scallops

Views were sought on whether there should be a seasonal closure for fishing for queen scallops, in order to protect them during their main spawning season. Queen scallops can currently be fished throughout the year in UK waters, while a statutory seasonal closure from 1 April to 31 May is in force in Isle of Man territorial waters.

4. Do you support an annual spawning closure for queen scallops in ICES divisions VIa and VIIa?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	33	100%
b) No	0	0%

Respondents were unanimous in their support for this proposal. Those who commented highlighted the benefits of a closure from a conservation perspective (protecting stocks at key spawning times) and an economic perspective (low yields reducing earnings):

“Macduff Shellfish believe an annual spawning closure would provide real benefits to this important fishery, not only would it allow the queen scallops to spawn but also allow the seabed time to recover.” [Macduff Shellfish]

“The poorest meat yields from the queenie are obviously during spawning times, so rather than fishing them harder, better to let them recover and continue to provide spawn.” [Scottish Fishermen’s Federation]

5. If Yes, which of the following closure options is preferred?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) One annual closure between 1st April and 31st May (i.e. same as statutory Isle of Man Closure)	7	21%
b) One annual closure between 1st April and 30th June	13	39%
c) One annual flexible closure between March and June, with specific timing determined by the fisheries management agencies, in consultation with industry representatives, and with reference to biological and commercial considerations.	13	39%

Respondents were split on how a seasonal closure should be implemented, with none of the options being favoured by a particular sector. The views of respondents in support of each option can be summarised as follows:

- Option A: would match the Isle of Man, and have a smaller financial impact.

“It makes sense to make all the areas have the same closed season and a 2 month closure would have less of an impact on the economics than a longer one.” [Isle of Man Seafood Products Ltd]

- Option B: would offer more protection by covering the entire spawning season.

“Queen scallops typically spawn in spring between March to May. By having the longest close season of May to June you are ensuring the maximum possible chance for the scallops to complete spawning.” [Individual respondent]

- Option C: would be more responsive to annual variations in spawning times.

“As queen scallop recruitment can be erratic and subject to fluctuations, closed seasons needs to be adaptive and based on the state of stock.” [Individual respondent]

6. Should fishery closures be implemented on a voluntary or compulsory basis (statute or licence condition)?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Voluntary	4	12%
b) Compulsory	29	88%

A majority of respondents also felt that any closures should be implemented on a compulsory basis. The shared view was that people would not comply with a voluntary closure over the long term, and that a compulsory approach would be easier to enforce:

“Any closure is likely to be most effective if it is respected by all relevant vessels, and the best way to enforce this is through a compulsory basis (for example as a licence condition).” [ClientEarth]

“It is an unfortunate reality that voluntary closures (or any other voluntary measures) will not work in the long-term.” [Individual respondent]

Even among those who preferred a voluntary approach one commented that, if fishermen were not complying, closures would need to be made compulsory:

“If this doesn’t work out then compulsory is the only option. With a strict enforcement and loss of fishing entitlement if not observed.” [Individual respondent]

Proposal 3: Entry Restrictions for the Queen Scallop Fishery

Views were sought on whether the number of vessels that can take part in the queen scallop fishery should be limited (i.e. restricting entry), and whether greater data collection should be a condition of receiving a queen scallop entitlement. The fishery is currently 'open access' in UK waters, meaning that it is open to any vessel with a commercial fishing licence.

7. Do you support the introduction of entry restrictions to the UK queen scallop fishery?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	29	85%
b) No	5	15%

A majority of respondents supported this proposal, with several commenting that restricting entry was necessary for other management measures to be effective. Others remarked that continuing open access arrangements, along with modern processing capacity, would have a further impact on stocks if the number of active vessels increased:

“The number of vessels needs to be controlled so that management plans can be put in place. Without limitation of numbers any management plans can be affected at any time and there would therefore need to be more micro management and administrations do not have the resources to continually alter plans.” [Manx Fish Producers Organisation]

“Any more expansion of the fleet can only have a detrimental effect on the queen scallop stock. In the past when queen scallops were all cut out by hand there was only a limited demand but now that processing machinery has been introduced the stock could be severely damaged as result of increased effort.” [AM Seafoods Ltd]

Those opposed to entry restrictions gave different reasons for doing so. These included that they could prevent new entrants from joining the fishery, or include areas that are not part of the current fishery:

“I do not welcome Entry restrictions. Main reason as we need to keep an opening for youth coming along and new entrants into fishery.” [Individual respondent]

“I can quite clearly see the need to restrict access in a fishery that has virtually no management but I cannot see the reason to bring the same rules into sea areas that are not heavily exploited but could be exploited in the future.” [Individual respondent]

8. Do you support the introduction of additional data collection as a condition of receiving a queen scallop entitlement?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	30	94%
b) No	2	6%

Nearly all respondents supported this proposal, with only two not being in favour. The shared view was that accurate data was essential to managing the fishery effectively, and that collecting additional data could only improve knowledge of the stock. Several felt it was reasonable for fishermen to contribute data, with it being noted that a similar practice was already in effect in Isle of Man waters:

“There needs to be more data collection and the boats are out there in all weathers and so are the obvious way to collect data.” [Isle of Man Seafood Products Ltd]

“It is a relatively simple thing to do and is standard in Manx waters that when requested to do so data is collected by the fishermen. Also the best way to get sufficient data in a short time period.” [Individual respondent]

The respondents opposed to the proposal did not consent to having their comments published.

Entry Restriction Options – Qualifying Period

Views were then sought on the management options available for implementing entry restrictions. The first of these was the preferred reference period for determining eligibility through a track record of fishing activity.

9. What is the preferred 3-year reference period for determining eligibility for the fishery in future?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) 2013-2015 – would tend to maintain current vessel numbers	10	43%
b) 2012-2014 – would tend to maintain current vessel numbers	0	0%
c) 2011-2013 – would tend to maintain current vessel numbers	0	0%
d) 2010-2012 – would tend to reduce current vessel numbers	13	57%

Respondents were split between the 2013-15 and 2010-12 reference periods, with a small majority favouring the latter option. These were mostly individual respondents, who felt that a reduction in vessel numbers was necessary for stock conservation:

“Catch rates are falling the fleet is too large for the resource.” [Individual respondent]

“There were less vessels and less pressure on the stocks at this time.” [Individual respondent]

The 2013-15 option was preferred by POs, processors and fishing associations, as well as some individuals. Their main view was that this option would avoid impacting on vessels that had been active in the fishery in recent years:

“This would maintain current levels but would avoid most of the pipeline cases and also reflects current practices. Effort control can be brought in through other means. Also this would enable those that have invested recently to be able to fish.” [Isle of Man Seafood Products Ltd]

Options for Entry Requirements

Specific activity criteria were also identified that could be used, in combination with the three-year reference period, to determine eligibility for entry. Views were sought on a preferred reference point (i.e. threshold) among the following options for differentiating between eligible and non-eligible fishing vessels:

- Option 1: Reported landings quantity, i.e. vessels would need to meet a certain tonnage of queen scallops landed.
- Option 2: Landings frequency, i.e. vessels would need to meet a certain number of recorded landings of queen scallops.
- Option 3: The number of days at sea of targeted fishing activity, i.e. vessels would need to meet a certain number of days spent fishing for queen scallops.

None of the above options had a clear preference over others; while nine respondents (39%) had selected just one option, 11 respondents (47%) selected from two or even all three options. There was however a common thread in respondents' comments for why they chose a particular reference point:

- Those selecting a broader reference point did so as it would allow most vessels who had fished for queen scallops to retain access to the fishery.

“Give vessels with small track record a chance to join fishery under conditions.” [Individual respondent – for Option 3(a) (Q12)]

- Those selecting a narrower reference point instead preferred that only vessels that could be proven to be reliant on the fishery should qualify for access.

“This would mean that only serious queenie fishermen were included and would cut the latent effort.” [Individual respondent – for Option 2(e), (Q11)]

Only a few commented on possible negative aspects of the three options, highlighting how each could be biased toward or against a particular size class of vessel:

“Basing this on weight might exclude smaller artisanal fishers from the market and favour larger vessels.” [Individual respondent – against Option 1 (Q10)]

“Option 2 favours smaller vessels who have to land more often.” [Individual respondent – against Option 2 (Q11)]

“Option 3 favours larger vessels who can operate under a wider range of sea conditions.” [Individual respondent – against Option 3 (Q12)]

The number of responses received for each option and preferred reference point were as follows:

10. What is the preferred reference point for 'reported landings quantity' during the 3-year reference period?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Up to one tonne landed during the 3 years would qualify.	2	10%
b) Minimum of one tonne landed during the 3 years would qualify.	2	10%
c) Minimum of 5 tonnes landed during the 3 years would qualify.	3	14%
d) Minimum of 10 tonnes landed during the 3 years would qualify.	4	19%
e) NONE - prefer use of Option 2 or 3.	10	48%

11. What is the preferred reference point for 'landing frequency' during the 3-year reference period?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Any recorded landing during the 3 years would qualify.	4	20%
b) Between 10 and 20 landings over the 3-year period would qualify.	0	0%
c) Between 20 and 30 landings over the 3-year period would qualify.	5	25%
d) Between 30 and 50 landings over the 3-year period would qualify.	0	0%
e) More than 50 landings over the 3-year period required to qualify.	6	30%
f) NONE - prefer use of Option 1 or 3.	5	25%

12. What is the preferred reference point for 'number of days at sea' of targeted fishing activity during the 3-year reference?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Any recorded days at sea during the 3 years would qualify.	4	20%
b) Between 10 and 20 days at sea during the 3 years would qualify.	0	0%
c) Between 20 and 30 days at sea during the 3 years would qualify.	5	25%
d) Between 30 and 50 days at sea during the 3 years would qualify.	0	0%
e) More than 50 days at sea during the 3 years would qualify.	6	30%
f) NONE - prefer use of Option 1 or 2.	5	25%

ANALYSIS OF CONSULTATION RESPONSES, PART 2: ADDITIONAL MANAGEMENT OPTIONS FOR CONSIDERATION IN THE MEDIUM TO LONG TERM

This section summarises responses to the second part of the consultation, which sought views on longer term management options that the queen scallop working group did not agree on for immediate introduction. It was felt however that stakeholders' views should be gathered on their potential use, in order to better inform future management considerations for the fishery.

Proposal 4: Effort Restrictions

Views were sought on whether controls to manage the level of fishing activity (effort) should be introduced and, if so, what management approach should be taken, in response to indications that effort in the queen scallop fishery is currently at too high a level. The consultation stated that, if effort restrictions were to be introduced, this would be in addition to entry restrictions and should apply to all size classes of fishing vessel.

13. Do you agree that effort controls should be introduced in the queen scallop fishery?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	33	100%
b) No	0	0%

Respondents were unanimous in their support for this proposal, believing that the stock was under increasing pressure, and allowing effort to remain uncontrolled would put it at further risk. They also agreed that effort needed to be controlled in addition to restricting entry, and that any controls should apply to all vessels:

“Effort controls are key to securing the future of the fishery, and are long overdue – unless a balance is struck between effort and the resilience of stocks to remain sustainable, the stock will become depleted.” [Individual respondent]

“Even limiting numbers does not mean effort is lowered as the qualified boats would just fish more. Also I doubt if the numbers will be low as there is too much vested interest and influence so effort control would be needed.” [Individual respondent]

“At present the only effort controls are the Western Water regime for the over 15m vessels. While this class of vessel has the greatest impact on the stocks there is a need to control the number of days for other classes of boats when fishing for a pressured stock.” [Manx Fish Producers Organisation]

14. If Yes, which of the following is preferred for development as a future effort management option in the queen scallop fishery?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Days at Sea scheme.	15	56%
b) Temporal fishing restriction, e.g. no weekend fishing, no night fishing.	12	44%

Respondents were split on a preference for how effort should be managed, with a small majority favouring a Days at Sea scheme as they believed it would offer more flexibility. They felt temporal restrictions would constrain the activity of smaller vessels which was subject to weather conditions, while weekend or overnight bans would make fishing offshore uneconomical for larger vessels:

“Weather often dictates the fishing patterns of vessels so a weekend ban would be unfair on the smaller boats who can only go fishing in certain conditions. It would be fairer to have a days at sea regime so that the fishermen can make their own decisions.” [Manx Fish Producers Organisation]

“Weekend and overnight bans aren't good for this fishery as need time and frequent landings to make any money.” [Individual respondent]

Those who supported temporal restrictions felt that they would be easier to enforce and more effective at reducing effort than a Days at Sea scheme, which they did not think had worked well elsewhere:

“Days at sea does not work as can be seen by the failure of Western Water days to control the pressure on the queenie stocks. Temporal restriction such as 12 hour fishing days will immediately reduce effort.” [Individual respondent]

“This is a better option for taking pressure off stock.” [Individual respondent]

“Easier for fishery protection patrols to police.” [Individual respondent]

Proposal 5: Introduction of Quotas for the Queen Scallop Fishery

Views were sought on whether a quota system should be introduced, which would be used to control the quantity of queen scallops that can be taken from the fishery. The consultation stated that determining an appropriate quota would require stock assessment, which has not yet been conducted for the whole fishery.

15. Do you support the principle of developing a long-term quota system for the queen scallop fishery?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	21	64%
b) No	12	36%

A majority of respondents supported this proposal, believing that it would be a good method for managing the fishery and beneficial for the stock. Several respondents also agreed that a quota system would need to be informed by evidence gathered through stock assessments:

“Quotas are now part of the wider fishery management across all stocks so why not for queen scallops to make control measures more enforceable.”
[Individual respondent]

“Although a quota system is highly reliant on accurate stock assessments and evidence base, this method is a good form of stock management.” [Individual respondent]

Those opposed to quotas gave different reasons for doing so. These included: negative experiences with the system used in the Isle of Man; that it would favour larger vessels; and that other measures were sufficient to manage the fishery:

“Experience so far of the model being used in the IoM is negative, and needs much more catching sector input to make it meaningful. Therefore extending that across the Irish sea is not desirable.” [Scottish Fishermen’s Federation]

“No as this favours large vessels fishing 24 hours a day not affected by weather as much as smaller vessels who may fish more sustainably over a longer period of time.” [Individual respondent]

“There should be no set quota and especially not individual quotas. If you have the other restrictions in place to control effort then you should not need quotas.” [Individual respondent]

Proposal 6: Introduction of Closed Areas for the Queen Scallop Fishery

Views were sought on whether spatial management (i.e. closed areas) should be used in the queen scallop fishery. The consultation suggested how this could be used to protect areas inhabited by high density populations of adult or juvenile queen scallops, or habitats where juveniles were likely to settle to grow.

16. Do you support the principle of developing spatial management options (closed areas) for the queen scallop fishery?		
<u>Option</u>	<u># of responses</u>	<u>% of responses</u>
a) Yes	25	78%
b) No	7	22%

A majority of respondents supported this proposal, with several citing the Isle of Man as a good example of using spatial management. However, it was remarked that the planning process for introducing closures would need to be supported by scientific evidence, and would have to consider the possibility of displacement to other areas:

“Totally - these have been used to great effect in the Isle of Man who are using an ever-expanding closed area system to good effect.” [Individual respondent]

“Spatial closures should be part of a management plan but should be flexible and based on robust science and evidence. Spatial closures must however take displacement of fishing effort in to consideration.” [Individual respondent]

Those opposed to this proposal believed that closed areas were not working in Isle of Man, saying they were difficult to enforce and had caused displacement. They also felt that the science currently available wasn't adequate for planning any closures:

“We have them on the Isle of Man and there is no evidence that they work. Also they displace effort to everywhere else.” [Individual respondent]

“Spatial management is a great theory but too much guess work involved, effort controls are the best way to enhance the fishery.” [Individual respondent]

Proposal 7: Introduction of Gear Specific Management in the Queen Scallop Fishery

Views were sought on whether the two main methods of fishing for queen scallops – dredge and otter trawl – should be managed separately, with specific measures being developed for each gear type.

17. Do you support the principle of developing equivalent, gear-specific management options for the queen scallop fishery?		
Option	# of responses	% of responses
a) Yes	24	77%
b) No	7	23%

A majority of respondents supported this proposal, with most believing that the two methods required separate management but that vessels should be able to fish using either method. However, a number of responses also called for net-only fishing areas, or for dredge activity to be prohibited entirely:

“As the 2 types of gear are so different it seems sensible to have separate management options. However, you should be able to switch between the 2 types of fishing as many vessels use both methods, within a given year, to target queenies. If you qualify overall for access to the queenie fishery it should not be on the basis of either net or dredge, nor should you have to make a choice at the beginning of a given period.” [Manx Fish Producers Organisation]

“Net area fisheries only zones, it's been my experience that well managed fisheries that have lasted several years can be destroyed in no time quite quickly by a large nomadic dredge boat fishery.” [Individual respondent]

“Nets not dredges should be used. Targeting with dredges destroys the benthos and increases bycatch. Nets reduce this.” [Individual respondent]

Those opposed felt that gear-specific management was unnecessary as other measures would be sufficient and apply to vessels regardless of fishing method used. There were also concerns that it could constrain gear innovation:

“I don't really see where this is leading. Effort control should cover all really if a boat has 18 dredges that's their choice but the curfews on fishing and MLS are the same for all.” [Individual respondent]

“Modifications can be made without State interference to improve and innovate for efficiency and effectiveness. Imposing design constraints might quash innovation and cause displacement without due cause.” [South Western Fish Producer Organisation Ltd]

NEXT STEPS

The UK Fisheries Administrations would like to thank those who took the time to respond to the consultation. The responses received will be taken into account whilst a formal response is developed, which will outline how the Fisheries Administrations intend to proceed. This is intended to be published in autumn 2017.

LIST OF CONSULTATION RESPONDENTS*

Organisations

- AM Seafoods Ltd
- ClientEarth
- Clyde Fishermen's Association
- Isle of Man Seafood Products Ltd
- Manx Fish Producers Organisation
- National Trust for Scotland
- Natural Resources Wales
- Northern Ireland Fish Producers Organisation Ltd
- Pupils 2 Parliament
- Scottish Fishermen's Federation
- Scottish Water
- South Western Fish Producer Organisation Ltd
- Western Inshore Scallop Group

Individuals

- Donald Gibson
- Emma Neave-Webb
- Ian Skelly
- Jennifer Meade
- Kevin Campbell
- Mark Roberts
- Marshall Thompson
- Melvyn Reid
- Michael Hill
- Thomas Bryan-Brown

*Who gave permission for their names to be published



Scottish Government
Riaghaltas na h-Alba
gov.scot

© Crown copyright 2017

OGL

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at
The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-78851-153-7 (web only)

Published by The Scottish Government, August 2017

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS282686 (08/17)

W W W . G O V . S C O T