

Action points from meeting with representatives of the Scottish Electro Razor Fishing Focus Group (SERFF) and the Scottish Razor Clam Association

Thursday 7 June 2018

Marine Scotland (Policy, Compliance and Science) and two of the public bodies supporting the electrofishing for razor clams trial (HSE, FSS) met with representatives of SERFF and the Scottish Razor Clam Association. Both groups have been recently established and represent a number of the participants of the electrofishing for razor clams trial.

Attendees

[information redacted], Marine Scotland	[information redacted]
[information redacted] Food Standards Scotland	[information redacted]
[information redacted]	[information redacted]
[information redacted]	[information redacted], Marine Scotland Science
[information redacted], Marine Scotland Compliance	[information redacted], Food Standards Scotland
[information redacted], Marine Scotland	[information redacted], Marine Scotland Compliance
[information redacted]	
[information redacted], HSE	

Overview of meeting

The morning session opened with Marine Scotland (Policy and Compliance), HSE and FSS giving an update on experiences since the trial launched on 1 February 2018. HSE have been conducting inspections and acknowledged the higher standard of dive operations since the trial commenced. HSE advised that intelligence has been received suggesting that the standby diver is not being used and that a Prohibition Notice would be issued if the third diver was found not to be kitted up. FSS set out the procedure for classification and monitoring and encouraged trial participants to contact them to help enable sampling/collection of samples.

The morning session of the meeting was dedicated to discussing queries raised by trial participants (page 3). It was confirmed that diver checks can usually be completed swiftly, within 3 working days, but there will be occasions during the year when resources dictate that up to 5 working days will be required. Crew/deckhand changes do not need to be notified. All those working onboard (divers and crew) must have the required certification for working onboard fishing vessels as per the Fishing Vessel (Safety Training) Regulations 1989 No. 126 as amended (Marine Guidance Note 411 M+F) [[Microsoft Word - 411 \(publishing.service.gov.uk\)](#)]

Marine Scotland drew attention to the definition of a 'day' in the Scottish Statutory Instrument [[The Razor Clams \(Prohibition on Fishing and Landing\) \(Scotland\) Order 2017 \(legislation.gov.uk\)](#)] and also to the Terms & Conditions of the trial, in particular 4.5 and 4.6. Marine Scotland confirmed that there are no current plans to amend the boundary of any of the trial areas.

It was agreed that a provision would be added to the terms and conditions to facilitate a steaming voyage between two ports which would be exempt from days at sea deductions. Marine Scotland

will consider adding a provision to reimburse time at sea for voyages carried out solely for FSS sampling purposes in exceptional circumstances (remote locations quoted by the representative groups). Marine Scotland emphasised that should it become apparent that these provisions are being abused then they will be removed.

A presentation by [Information redacted], Marine Scotland Science, generated discussion and suggestions for collaborative working to develop the science requirements for the trial. The presentation set out the different types of data that are of interest and why.

***ACTION POINTS ON PAGE 2**

ACTION POINTS

[information redacted] and [information redacted]

- Send to [information redacted] a list of the vessels that SERFF and the Scottish Razor Clam Association represent.

[information redacted]/ [information redacted]/ [information redacted]

- Prior to issuing revised derogations and terms and conditions of participating in the trial:
 - I. add provision for a steaming voyage to T&Cs in order for vessel to move ports exempt from days at sea deductions
 - II. consider the addition of reimbursing time at sea for trips solely for sampling purposes in exceptional circumstances (remote locations)
 - III. consider with Jo and Ally the implications of gear being stored at sea

[information redacted]

- seek views from colleagues on supplying local market 'positive release'
- pass on comment to [information redacted] about stating name and PLN of vessel on movement documents

[information redacted]

- Provide SERFF and the Scottish Razor Clam Association with a written breakdown of what biological data and samples are required from trial participants and/or related factories, including:
 - I. monthly live samples to be sent the Marine Laboratory in Aberdeen
 - II. catch sampling procedure and guidance to be carried out at factories preparing razor clams for export
 - III. catch recording on a tow by tow basis

Queries raised by the [Scottish Razor Clam Association](#) and the [Scottish Electro Razor Fishing Focus Group](#)

i. Change of Crew/Divers

a) How much notification is required? b) Do crew changes (not involved in diving) also need to be notified?

ii. Terms and Conditions of the trial

a) 24 Hour period

Can we clarify the time that will be used i.e. UTC or British summer time?

Regulations stipulate from midnight to midnight. Depending on tidal and/or weather conditions this could be very restrictive. As monitoring equipment will be on board could the 24hr period commence from when the machine is switched on? Similarly, if having phoned to confirm leaving port intending to razor fish, on arrival at the dive site either visibility or weather conditions dictate otherwise, can this be classed as a non-day? Only when the box is switched on should a day be used.

b) Daily catch limit of 450kg

What is definition of 'landed weight of 450kg'? At which point are the razors 'landed'? Bearing in mind that with water loss 450kg at the quay could be reduced by several kilo by the time they are weighed and packed out. Will Marine Scotland allow a small margin of tolerance – 10kg?

How will the weight of razors be calculated? In the summer months it is necessary to run water through the razors constantly to ensure they do not die. If the boxes were weighed on deck with the water this would result in a far higher weight but would not be the net weight of razors. The concern is that delegates would be in breach of the derogation regulations if you took the gross weight inclusive of water.

Suggestion that boats allowed to fish at Tiree could be given a special dispensation to allow a 2-day trip, landing no more than 900kg. The time/cost to get to the area, fish and return to port within 24hrs could prove difficult.

c) Exploiting other fisheries whilst participating in the trial

Regulations state that it is not permitted to carry underwater electrics on board if not fishing for razor clams. Concerns expressed that due to changing weather conditions they would want to have the option of leaving the razors and go clam diving/trawling or vice versa, without having to return to port to remove or load on the rods & cables, thereby losing an opportunity to have a day's fishing of any nature. Removing/reloading the cables/rods carries a safety issue and the equipment could be damaged if swapped regularly. If the machine is not switched on, and is being monitored then this action is not necessary.

Clarification required on what is counted as electro fishing equipment on board as it is not possible to remove the generator or pulse box each time you travel but are not electro fishing. Would it therefore be deemed that you do not have electro equipment on board if the vessel is not carrying the cables & rods?

iii. Site sampling and classification in trial areas

a) Trial areas and classified areas

Concerns that some of the zones approved fall short of do not include the classified areas.

Tarbert bank - the trial area is very slightly north of the classified section. Could it be possible to include the classified area within the zone?

b) Days at sea

There are a couple of more remote areas where the gathering of razors for sampling will prove very difficult: namely Coll & Tiree. The cost/time involved does not justify losing a day for 12 razors. Can SFS collect samples from the ferry terminal? Or accept samples from an unlicensed boat, or if it is insisted that it needs be a licensed boat then they should not lose a day from their 110 day allocation.

The NW zone does not have sufficient classified areas to allow all boats in this area to currently fish & will result in vessels being penalized financially. As indicated by Marine Scotland, each day you travel to collect a sample will result in a loss of a fishing day plus the time it takes to steam to these areas without fishing. Would it be acceptable to hand pick the samples in these areas or have a fast vessel specifically for sample collection but not for fishing?