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NWWAC response to the UK consultation on the proposed King Scallop Fisheries Management Plan

02 October 2023

The UK Department for Environment, Food and Rural Affairs (DEFRA) launched a consultation on the proposed King Scallop Fisheries Management Plan in English and Welsh waters.

Given its role as legitimate EU fisheries stakeholder body and the geographical remit of its work, the North Western Waters Advisory Council (NWWAC) has prepared the following response to the consultation's online questionnaire, which has been approved by the NWWAC Executive Committee on 29 October 2023.

Response to DEFRA online questionnaire

1. Do you have any comments on the process for developing the King Scallop FMP?

The NWWAC definitely sees the need for a good management plan that can benefit both fishermen and the scallop stock in the English Channel. However, the Advisory Council points out the tight deadline and the timing set to reply to this consultation. This consultation is taking place simultaneously with consultation on other FMPs and on other relevant topics (discards and remote electronic monitoring), all of them closing at the beginning of October. Each of them includes a substantial number of documents to examine. The fact that all these consultations were opened in mid-July, just before the summer holiday period, created further difficulties in gathering stakeholders' views. We recommend that, in future consultations, these elements are taken into account to ensure proper engagement and participation of stakeholders.

2. What are your views on the evidence presented on the current state of the king scallop stocks in English and Welsh waters and can you provide any other evidence which supports or differs from ours?

We recommend taking into account stock assessments and other research done by Ifremer and the results of the SELEDRAG project.

3. What are your views on the evidence gaps identified within the FMP?

No response

4. Do you agree with the actions to address the evidence gaps?

Stock assessments for king scallop have been carried out for over 30 years using the same protocol in France and also in Ireland to establish stock size and inform any future management plans.



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5. What role can area-based closures play in effectively achieving stock sustainability and FMP goals under the proposed new management framework (in terms of environmental, economic, and social considerations)?

The NWWAC agrees that seasonal closures for scallops targeting fisheries to protect spawning stocks, like those implemented in French waters, are important elements towards achieving a sustainable management of the scallop stock in the Channel. However, we consider that closures to protect seabed features in addition to the MPA stages in process will not have an added value.

Prior to measures adoption and implementation, it is important to define the methods for achieving the objectives set for such closures. The choice of closures sites and time should be based on a solid scientific base in combination with experience and knowledge from fishers, who should be involved from the start of the process and engaged throughout every phase.

Closures should be monitored and regularly evaluated to assess their environmental, social and economic impacts.

6. Are there particular stock areas you think closures could be beneficial (for example, to protect spawning stock, and/ or seabed during spat settlement), or detrimental to the FMP goals?

We recommend considering recent study from Ifremer, “Impact of the implementation of marine rotational harvest area impacts on the population dynamics of King scallops”, published in September 2022.

7. Where do you see opportunities for strengthening existing measures to ensure they are fit for purpose to achieve stock sustainability and FMP goals under the proposed new management framework (in context of environmental, economic, and social factors)?

The main management tool being used at present is the use of area closures mainly in the summer period. These closures should be regionalised and assessed for economic impact as well as their possible impact in improving the stock of king scallop.

8. Do you agree with the proposal to explore and develop a scientifically based output control approach and/or input control approach, and are there potential benefits and drawbacks (environmental, economic, social) that should be considered at any early stage in the process?

Very solid stock assessments are required to achieve such the objective of this proposal. The effects of pressures other than fishing must be taken into account when introducing output controls.



9. Are there any additional management measures that should be considered to protect king scallop stocks and the wider ecosystem, and why?

In France, the SELEDRAG project introduced some management measures for the Channel area inside the 12 nautical miles which include the use of increased ring sizes to improve selectivity in the king scallop fishery. Ireland is currently conducting trials on this type of gear measure.

The 97mm rings have been made compulsory in France in the 7d and 7e for all dredgers, both on coastal areas and offshore.

10. Are there any measures which should be prioritised for early action in line with the precautionary approach, and why?

Selectivity should be prioritized to protect the stock biomass, for example by increasing the ring size and implementing temporal closures.

11. Do you agree that establishing a co-management approach is the most effective way to manage the king scallop fisheries in English and Welsh waters moving forward, and why? What role do you think you/your organisation could play to support a co-management approach?

Globally, the centralised top-down governance of fisheries and conventional input controls have proven inadequate in resolving many issues associated with modern exploitation of fisheries resources. By contrast, co-management seems to be a more effective tool especially because it integrates stakeholders' knowledge into science and policy, which is also the objective of the NWWAC. The NWWAC aims at ensuring stakeholder involvement in the EU decision-making process regarding fisheries management in the EU North Western Waters. While the NWWAC is not an official entity in the UK, we consider being an important partner in this consultation and in supporting a co-management approach, given our role as a legitimate EU fisheries stakeholder body and our geographical remit.

While co-management remains a valid option, biological reality must take precedence. In ICES 7d most of scallop, over 80% of the biomass, is located in EU waters and on the French coast. It is therefore important to respect local management measures and the interests of coastal fleets that depend on these sedentary resources.

12. How would you like to be involved in the delivery of the plan and the future management of the English and Welsh king scallop fishery?

The NWWAC would like to be kept informed of any proposed measures which may be introduced as part of the FMP and to be included in any consultation where this is possible under the rules of the TCA.



13. Are there any important connections or links to other fisheries that we should consider when finalising this FMP or during its implementation process?

The NWWAC wishes to raise a vital issue in relation to the implementation of the FMP, which is the risk of having two diverging policies, one in the EU and one in UK waters, which would create a huge discrepancy and make it extremely difficult for vessels to operate. There are substantial interactions between the two areas on a daily basis and it is important that attention is given to the practicalities of implementing any changes. Joined up thinking, which is envisaged under the TCA, is needed and should be a priority for the work of the Specialised Committee on Fisheries.

Finally, the NWWAC wishes to point out that harmonisation should not be carried out at the cost of existing best management practices which protect the natural resources and ensure sustainability of the stock for years to come.

14. Is there any additional evidence we could consider, to inform our environmental baseline?

Ifremer current modelling shows that most of scallops in southern England come from larvae from the Seine Bay. We also note a density of 2 scallops/m² in the inner Seine Bay 12 nautical miles. Much less on the coasts of southern England in 7d.

15. Are there any other positive or negative environmental effects associated with the policies and actions of the draft King Scallop FMP that we could consider?

No response

16. Do you have any comments on the proposed actions set out in the Environmental Report to monitor and/or mitigate any likely significant (negative) effects on the environment of the FMPs?

No response

17. Do you have any additional comments in relation to the Environmental Report which you have not been able to provide in response to the previous questions?

It would be important to have health monitoring on the UK side. France trades a lot of whole/live scallops and health monitoring (DSP/ASP) is needed to guarantee toxin-free products for consumers.