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Shellfish
Association of Great Britain

Our ref: NFFO/3560/BCD/jl

George Eustice MP
Minister for Fisheries
DEFRA
Nobel House
17 Smith Square
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Dear Minister

Crustacea Shellfish Policy Inertia

This letter is written jointly on behalf of NFFO and the Shellfish Association of Great Britain.

You may be aware that the NFFO recently convened a Shellfish Summit, in Greenwich, to discuss the future of the shellfish potting sector in light of anticipated challenges. The event was an inclusive one, involving fishermen, regulators, processors and scientists. The Shellfish Association of Great Britain was a central participant, both in terms of presentations and subsequent discussions.

I think that it is fair to say that the meeting came to three main conclusions:

1. Scientific and Knowledge underpinnings

The meeting took the view that there is a demonstrable need to put in place a long- term mechanism for involving fishermen in the collection of data to strengthen and underpin the knowledge base for management of the shell-fisheries. We – NFFO and SAGB - are now working on ways to put in place the arrangements that will deliver this aspiration.

Interestingly, the Defra science symposium the following two days came up with similar suggestions.

2. Regionalised Measures/Participation

The meeting confirmed that for the most part *regionalised* measures are the appropriate means for managing the shell fisheries within the 6 mile limit, where variations in stock, local ecosystems and fishing dynamics can be very significant. It follows that the IFCAS have a central role to play in implementing a regionalised approach. At the same time, there are concerns within the industry that there appears to be a wide variation between different IFCAs insofar as transparency and participative decision making is concerned. It is important that all IFCAs pay due attention to best practice in this regard.

Perhaps a best practice guide on good governance could be produced?

3. Capacity Constraints for the High Volume Crab fleet

The NFFO published its Shellfish Policy in 2011. Its starting point is that the over-15m high-volume crab fleet should be *ring-fenced* to prevent further expansion. Without this foundation, it is unlikely that other conservation measures will be able to achieve very much as they will be undermined by increasing fishing effort in the pot fisheries. Constraining fleet capacity to a broad equilibrium with available resources is the basis for all successful fisheries management strategies.

Although our proposal was based on a consensus within the shellfish sector and a thorough analysis of the way forward for shellfish conservation, it is fair to say that it has been met with by determined inactivity on the part of policy makers. Partly this has been due to the fact that ring-fencing would require new legislation and the Government's moratorium on additional rules affecting business has been given as the primary reason why no progress has been made. This assumes that all rules are unhelpful. However, this is hardly good enough as a blanket obstruction to new regulation leaves a policy vacuum with no plan on how to constrain shellfish effort and therefore no foundation for a coherent approach to managing the pot fisheries. It is difficult to see how the objective of attaining maximum sustainable yield in the crab and lobster fisheries without taking this fundamental first step to constrain capacity in the fishery.

The Summit felt that it was vital that DEFRA take a fresh look at this issue. If there has been one lesson learned from UK fisheries management over the past 20 years it is that an early, pre-emptive, approach before optimum yields begin to decline will save much more difficult and painful measures later on. The assessments of the shellfish stocks now being provided by CEFAs suggests that we cannot afford to prevaricate any longer. Hard lessons have been learnt in other sectors when preventative measures were left too

late. The shellfish sector has no wish to follow that difficult experience.

Dealing with the expansion of capacity is seen as a *precondition* for a wider package of measures to ensure that the shell fisheries remain on a sustainable footing and it is important that we now see movement backed by the UK Fisheries Minister.

In addition, there are several crab fisheries that are exploited both inside and outside the 6 mile limit, (and therefore IFCA districts) so it follows, if we are to manage these stocks appropriately, that national arrangements will be necessary.

Against this background we would request that you look into this issue as a matter of urgency. Ring-fencing the over-15m fleet will not solve all the problems facing the shellfish sector. It will however help to forestall some of the most urgent threats to sustainability and economic viability that otherwise are likely to undermine the future of the industry and the those that derive a living from it.

Signed

For NFFO

For SAGB

