

Department of Environment, Food and Agriculture

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Summary of Responses to Consultation

2021

Joint Consultation on the Isle of Man King Scallop Fishery

Isle of Man Scallop Management Board and Department of Environment, Food and Agriculture
consultation on

A long-term management plan for the king scallop fishery
within the Isle of Man territorial sea

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Part 1. Introduction

Background

In December 2020, the Isle of Man Scallop Management Board (SMB) submitted a Discussion Document on a Long Term Management Plan (LTMP) for the Isle of Man king scallop fishery to the Department of Environment, Food and Agriculture. This was followed by a SMB meeting in February 2021, during which a series of High Level Objectives (HLOs) were agreed and endorsed by the Scallop Management Board (see section 1.7), which outlined the industry's vision for the future. The SMB meeting in February 2021 also resulted in a recommendation from the Board that DEFA work with industry to develop a LTMP for the fishery based on the industry Discussion Document and the agreed HLOs, and that a public consultation on the LTMP is subsequently launched.

The industry-driven initiative to develop a LTMP resulted in a sub-group of the SMB, including industry representatives, Bangor University, and the Department working collaboratively to produce this Joint Consultation. During June 2021, the industry members of the SMB convened in a series of 'LTMP consultation workshops' to consider the consultation documents in full, before then officially endorsing it and recommending that DEFA launch the public consultation.

This consultation was split into two parts and was accompanied by an Evidence-base:

Part 1 provided an in-depth technical description of developments over the period 2008-2020 with respect to management of scallop fisheries in Manx and UK waters. Part 1 was largely constructed by DEFA officers, and provided a 10-year historic context for the LTMP consultation (reading time.

Part 2 was the consultation itself, which contained questions relating to the LTMP ranging from high-level 'in-principle' questions to specific technical considerations. Part 2 was co-developed by the SMB sub-group, and is based largely on the industry Discussion Document and SMB endorsed HLOs.

An Evidence-base was included for those parts of the consultation that present and/or propose specific outcomes that can be quantitatively assessed. The Evidence-base was produced by Bangor University. An Appendix was attached to the consultation, which included the most recent stock advice from Bangor University utilising fisheries-independent scientific and industry surveys, and fisheries-dependent data from previous season (for the 2020/21 fishing season).

The king scallop fishery in Manx waters is economically critical to the local industry, and important to many businesses in the wider UK scallop industry. However, sustainable management of this resource remains challenging despite reductions in fleet capacity, innovative approaches to spatial management, and an increased level of scientific assessment, monitoring and co-management. At this time, the SMB, the Department and Bangor University consider the main barrier to an economically successful and sustainable fishery to be the absence of a long-term strategic approach that informs the Harvest Control Strategies each year. Furthermore, the lack of appropriate effort and fleet capacity management measures is an immediate barrier to implementing a Harvest Control Strategy that is aligned with a bioeconomic sustainability.

The industry, through the Scallop Management Board, demonstrated initiative and leadership in their call for a Long Term Management Plan for this fishery, which should facilitate a more strategic approach to how the resource is managed with the overall aim of delivering high-level socioeconomic and biological objectives.

The Department and the SMB sought stakeholder views on a LTMP for the Manx king scallop fishery and a range of short-to-medium-term management options that are aligned to the LTMP and its

HLOs.

Part 2. The consultation exercise

A public consultation process was undertaken between 6th August and 29th October 2021. The objectives of the consultation were:

- To inform industry and other interested stakeholders of the challenges facing the sustainable management of the Isle of Man king scallop fishery; and,
- To seek views on the high-level objectives of a long-term management plan, as well as a range of proposed management measure, which related to:
 - Co-management and future-proofing a long-term management plan
 - Access and feet capacity
 - Technical Measures
 - Additional considerations

The consultation document was posted on the government Consultation Hub website, notified to working group industry representatives and communicated to the UK fisheries administrations;

- DEFRA
- Marine Scotland
- DAERA (Northern Ireland)
- Welsh Assembly Government

A government press release was made, and the consultation process was covered by Manx Radio, BBC News, and other media organisations. At the close of the consultation, a total of 25 responses had been received, and are catagorised and presented as:

	Conservationist
	Ex-Fisher
	Fisher
	Fisher and Vessel Owner
	Fisher, Vessel Owner and Processor
	Processor
	Producer Organisation

Part 3. Responses

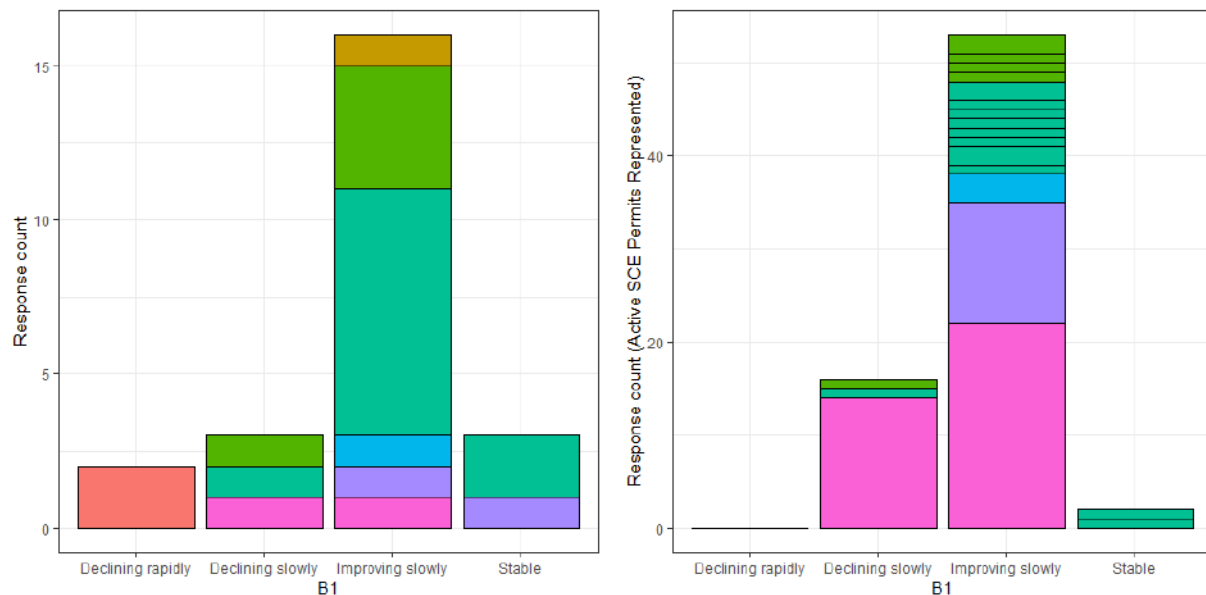
The consultation received 25 responses, some of which included responses *on behalf* of a number stakeholders with active king scallop entitlements. This has been taken into consideration in the summary of responses by displaying the responses both;

1. In terms of the number of response submissions, by stakeholder category; and,
2. In terms of the number of scallop-permit holders represented by response submissions, by stakeholder category.

A subsample of qualitative comments are highlighted from those submissions where the individual or organisation has given permission to publish their responses. These broadly capture the range of responses received during the consultation. POs represent and respond on behalf of multiple stakeholders, therefore their responses are highlighted separately from other commercial consultation responses.

Section B – Perception of - and vision for - the Isle of Man King Scallop Fishery

QB.1 What is your perception of the overall trend in the state of scallop stock(s) in Isle of Man territorial waters since the fishery was reviewed in 2016?



Comments:

All measures implemented by the SMB are materialising and securing the future of the territorial sea. Without question this model is the way to go as the old model always left us with a fishery dependent on recruitment and we need to have a stock based fishery.

After a few years of decline following the 2016/17 season and the introduction of TAC and DCL the stock appears to be improving over the last couple of years. This stock improvement will of been helped slightly by the COVID pandemic limiting markets and restricting boats from using harbors' due to border controls.

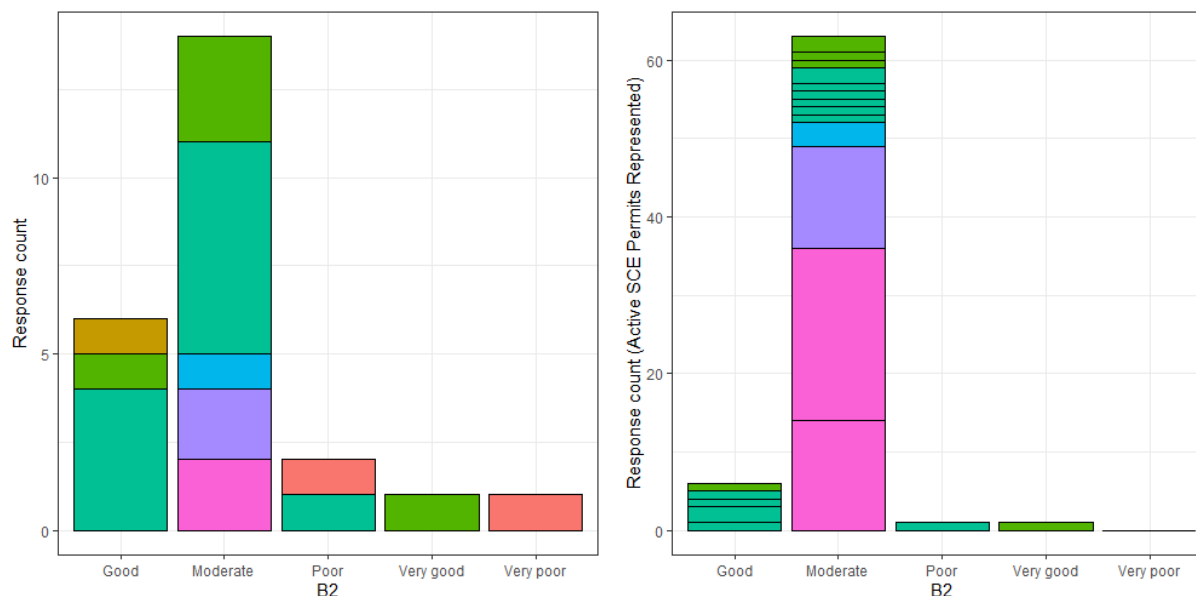
Due to bad management I.e. giving out too many licences to visiting vessels with no quota the scallop stocks had been over fished. I believe the scallop stocks are recovering well.

Stable, but precarious. As with all UK fishery in general, Stock biomass must improve to ensure robust and sustainable environmental and economic future for the fishery

The number of boats that had entitlements to fish in Manx waters was still far too many even after the 2016 reduction. There has been some natural wastage since then but there are still 83 boats entitled to fish for King scallops. With no additional management (apart from reducing the number of boats) the stock was heavily overfished in 2016/17. As a result, from 2017/18 there had to be other management measures brought in such as a Total Allowable Catch (TAC) and Daily Catch Limit (DCL) in order to control the effort and landings. Each subsequent year until 2020, the stock declined and more stringent measures had to be brought in. It is only now, with an uneconomic DCL, that we have managed to control effort to such a level that stocks have shown signs of improvement with stock increases in 2020 and 2021. They are still below the 2016 level. This indicates that the number of licensed boats is far higher than the stock can withstand. The situation is slowly improving from a very low point but there is far too much potential effort and so the severe and uneconomic DCL's will need to remain until effort is applied appropriately.

In my 40 years scallop fishing experience Irish Sea shellfish stocks have always gone in natural cycles, we are currently on an upward part of the latest natural cycle - this is without any human influence, just as it always has been - nature has always been and always will be the big driver in Irish Sea Scallop recruitment, anyone assuming or presuming otherwise is perhaps kidding themselves on.

QB.2 What is your perception of the current state of scallop stock(s) in Isle of Man territorial waters?



Comments:

The biomass is showing good recruitment a result born from well a planned strategy.

Some areas are showing good numbers of recruits and non-recruits but certain grounds (chickens) aren't showing the recruitment it has historically. Nature could obviously have something to do with this (weather, currents, spawning periods etc.) but I feel a lot of this is down to certain vessels taking the small scallops home and reseeded their own shores. Whilst other vessels are taking more than the DCL and logging the excess as caught outside the territorial sea, effectively giving false numbers about what has actually been harvested.

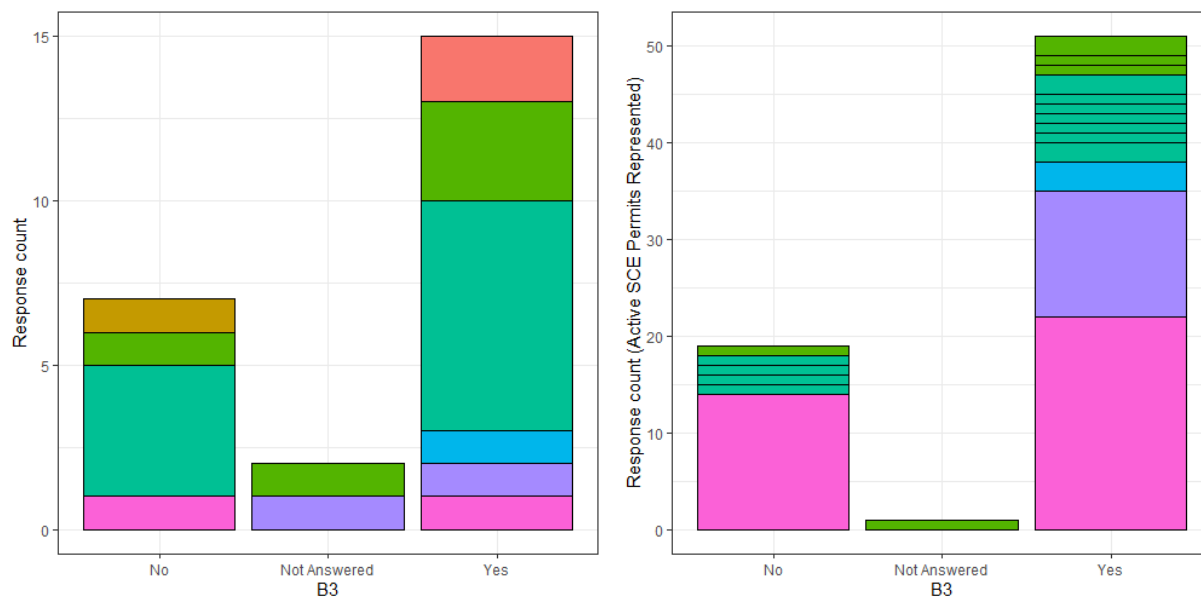
A lot of juvenile scallops especially east Douglas

Poor, the amount of scallops on the ground doesn't provide for an economically sustainable fishery for vessels participating.

It has improved in 2020 and 2021 but this may be partly due to the reduced level of landings as a result of Covid and not solely the strict management regime.

As above, we are on an upward trend in the natural cycle.

QB.3 Would you characterise the Isle of Man king scallop fishery as recruit-dependent?



Comments:

We are in a transitional stage and I'm confident we attain a stock based fishery.

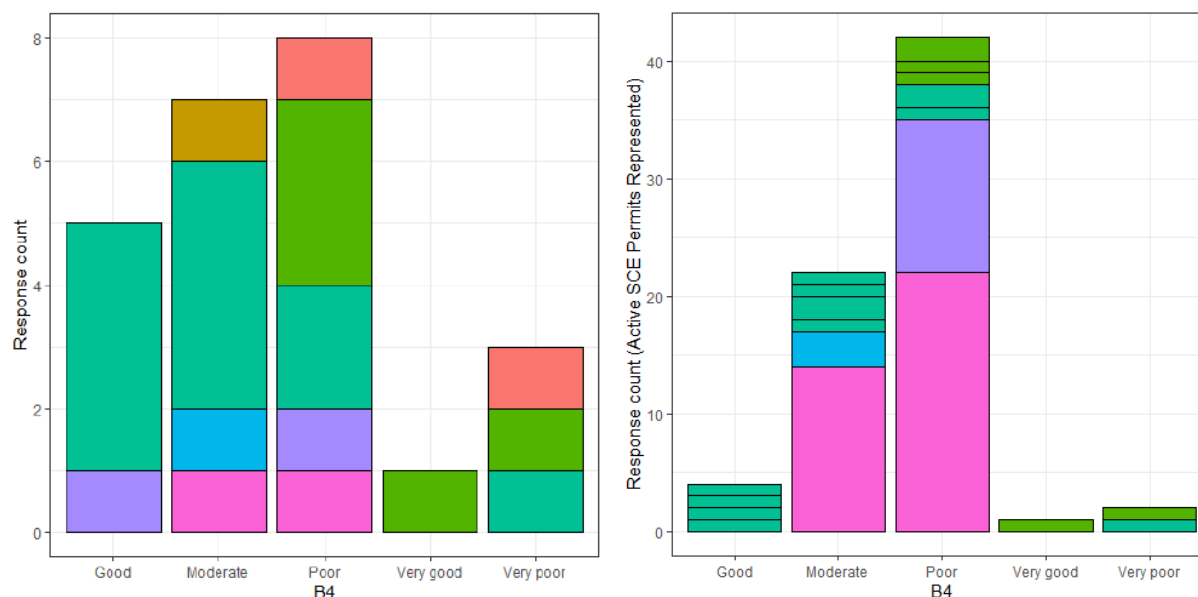
This is a result of too much effort. Reducing the number of vessels would help this but I don't feel it possible to reduce the effort/number of vessels enough for the fishery to not be dependent on recruitment as the territorial sea just isn't a large enough area.

This is not a healthy situation either for the stock or vessels reliant on the fishery

The improvement in the past 2 years (from a very low level) is due to new recruits growing into the population. We need to have a multi-year class stock which is far more resilient and able to withstand years of poor recruitment.

There is always a huge variety of scallop sizes in Manx waters depending on location, this does not indicate being largely dependent on any single year class, more the opposite.

QB.4 What is your perception of the overall long-term outlook on the state of scallop stock(s) in Isle of Man territorial waters based on the current management strategy and existing management framework (i.e. without any significant changes to how scallop fishing is managed)?



Comments:

We must reduce the amount of vessels. I believe this is essential to achieve the long term goal of a stock based fishery.

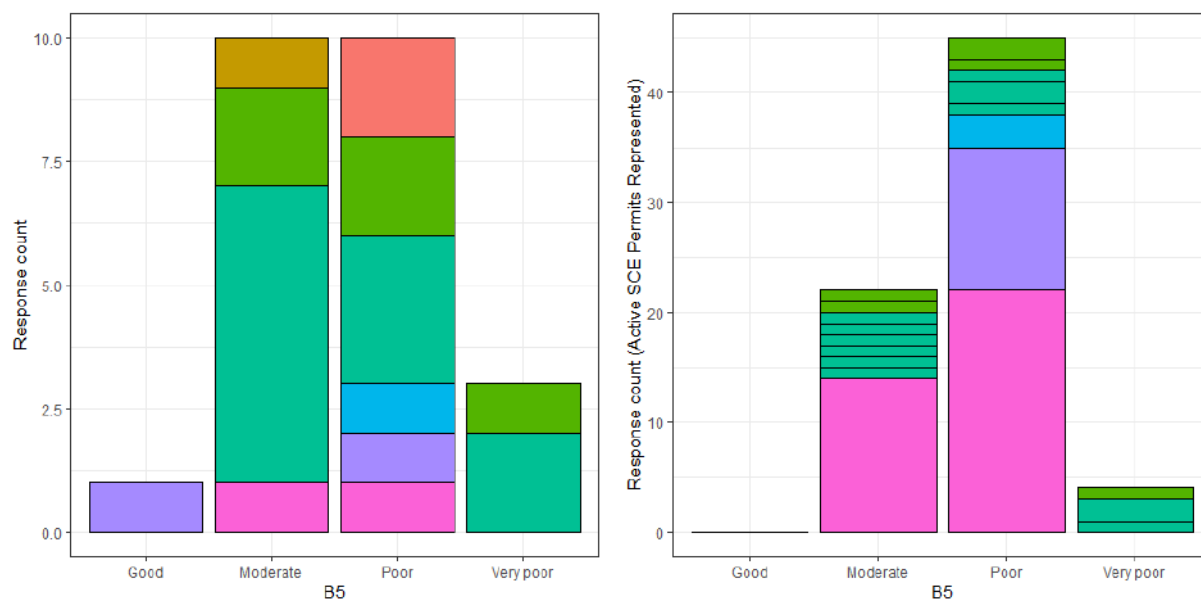
While stocks are low fewer vessels prosecute the fishery, but as stock levels build, TACs and DCLs rise it becomes more attractive to the vessels that maybe haven't accessed it when stocks were low, causing the stock to be depleted and starting the recovery process all over again. I would also emphasize that the stock levels rely a lot on other variables that are out of our control (natural effects such as tides and weather when spawning takes place).

Without change in management strategy, it's hard to see how things will improve.

The MFPO would wish to say the long-term outlook is moderate as there are signs of stock improvement. However, under the existing management framework we would have to say it is poor. There is far too much potential effort which could quickly reduce the stocks back to the 2019 level. Any improvement may therefore be short-lived.

Irish Sea shellfish stocks go up and down naturally, they always have done and they always will do. We are currently on an upward part of the latest natural cycle - this is without any human influence, just as it always has been.

QB.5 What is your perception of the short-term economic viability of the scallop fishery in Isle of Man territorial waters based on the current management strategy and existing management framework (i.e. without any significant changes to how scallop fishing is managed)?



Comments:

Most local vessels are operating short-handed as the reduction in DCLs over the last few years have made it uneconomic to support a full crew. The majority are older vessels that require modernization/replacement but the current limits make it impossible to replace them with more modern vessels.

Poor market prices will not improve any time soon.

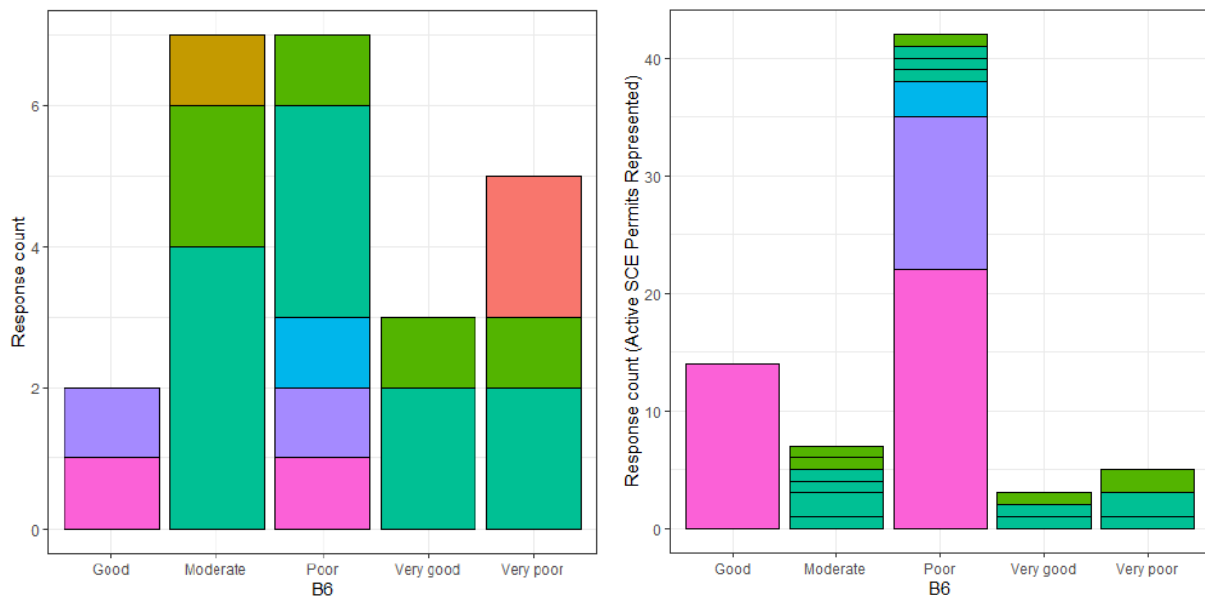
Although the current Isle of Man scallop fishery management is superior to anywhere else in UK waters, against a backdrop of ever increasing vessel running costs and the need for increasing crew wages things must change if the fleet is to be viable in the future.

Also scallop dredging is under ever-increasing scrutiny from an environmentally aware public, scallop management must be rigorous enough to stand-up to any criticism

With the low prices, partly as a result of Covid and its impact on the economies of almost all major markets and the low level of DCL (which is necessary to control effort, landings and to ensure the fishery lasts the full 7 months) will mean that in the short term the economic viability is poor. While there will probably be some improvement in the market this will be offset by the extra delivery costs associated with Brexit and also the rapidly rising fuel prices.

I say moderate but with sensible management which made the most of the resource when it's at its most abundant and valuable it would be good or very good, this does not require "significant change".

QB.6 What is your perception of the long-term economic viability of the scallop fishery in Isle of Man territorial waters based on the current management strategy and existing management framework (i.e. without any significant changes to how scallop fishing is managed)?



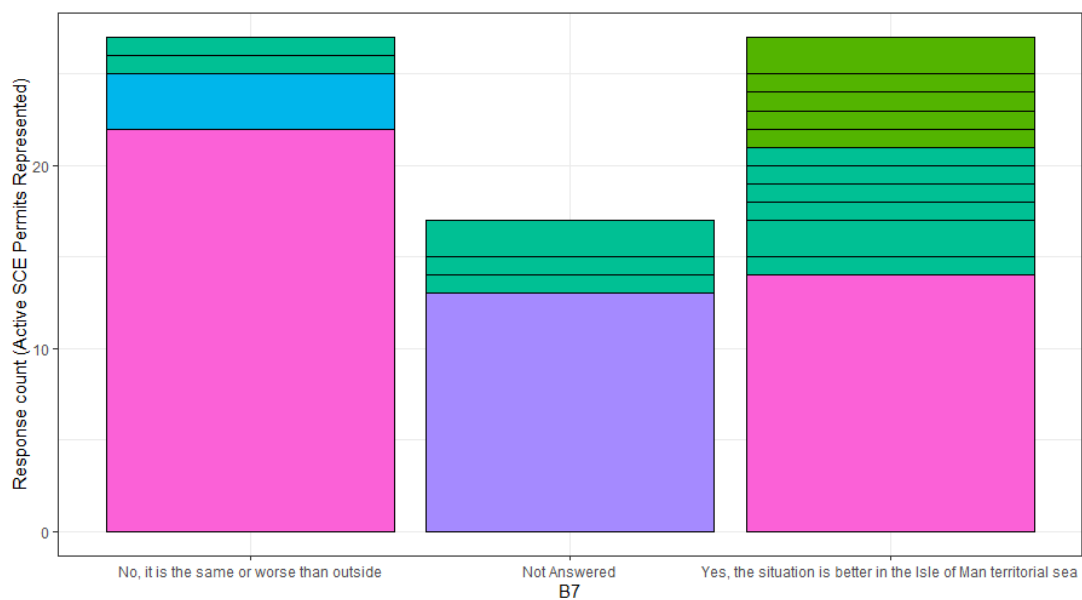
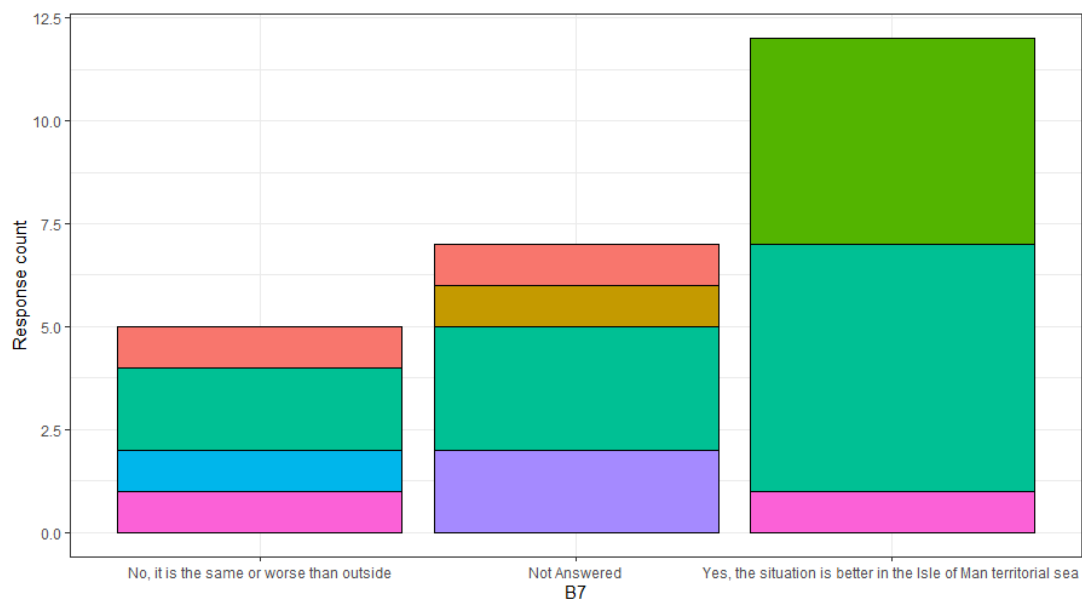
Comments:

In the future when prices improve to as they were pre-covid.

In order for the fishery to be economically viable it needs all boats to have the potential to make a profit on each fishing trip. This is not possible with the current level of stocks and the potential effort within the fishery. Any increase in the DCL, to allow for more income, will attract more effort which will mean higher landings. The DCL will then have to decrease to ensure the TAC is not exceeded and the fishery lasts the full season.

I say moderate but with sensible management which made the most of the resource when it's at its most abundant and valuable it would be good or very good, this does not require "significant change". Economic viability was always good in the past, now in an era of micro-managing it seems not to be.

QB.7 For those stakeholders that also fish for scallops elsewhere, do you consider the general situation (taking into account how scallop fishing is managed, and the status of stocks) to be better within the Isle of Man territorial sea, compared to UK waters?



Comments:

The general situation is better in that it's easier to catch scallops. But in my opinion this only helps the lesser fishermen and hinders the better as it's not an equal opportunity industry in the Isle of Man.

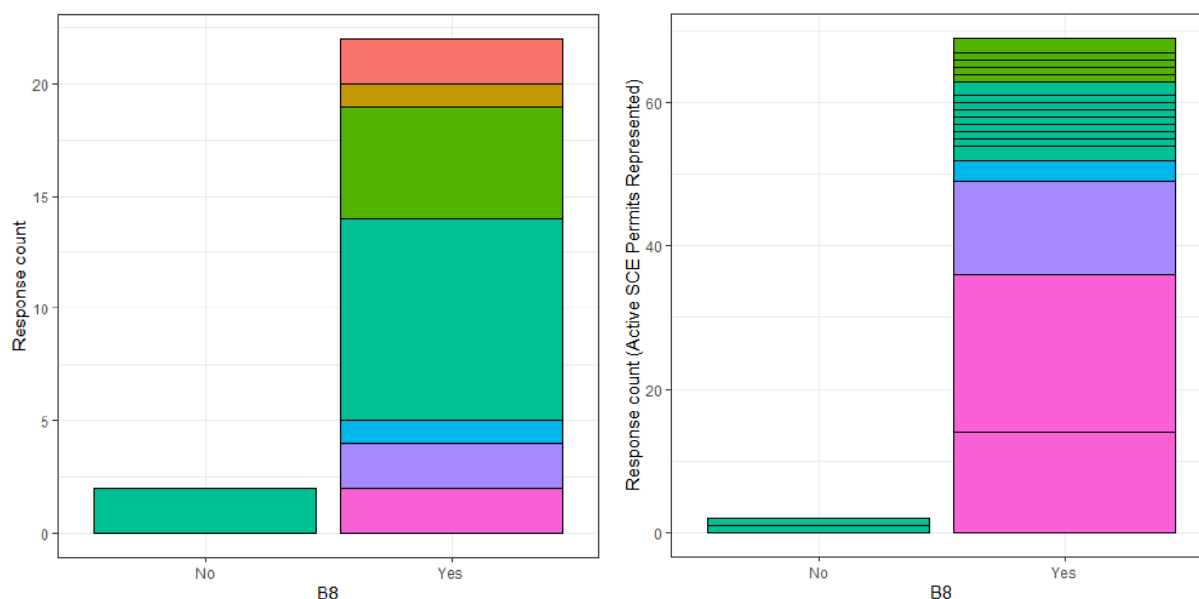
Management is shamefully poor in UK waters - as with the fishery in the Isle of Man TS, things must improve if there is to be a future for the UK scallop industry

The Manx Territorial Sea is better managed than UK waters and has the potential to be better than UK waters. However, there is so much variation in management between Manx Territorial Sea (MTS) and the UK that is difficult to compare. There is 24 hour fishing in UK waters (12 hours in MTS) and several stocks to target. Therefore there is the potential to be able to catch more in UK waters. There is also the potential to overfish some UK waters and make it economically unviable. It is certainly 'a race to fish' in UK waters. Therefore as the season develops there may be some stocks that are better and some worse than IOM stocks. The fact is that there is a maximum value that can be achieved for a day's fishing (12 hours) in the MTS but theoretically no maximum in UK waters. If you are part of the UK nomadic fleet (typically larger and more powerful boats than the Manx fleet) then the general situation is probably economically better in UK waters than MTS as there are less stringent management measures. Further, some areas around the UK permit all year round fishing and so in that respect fishing is available for 12 months rather than 7 months.

In summary, the Manx TS is better managed but perhaps economically unviable in the long term, at current fleet levels. UK waters have less management and so the stocks, in theory, are more susceptible to overfishing but allow a higher level of income if prepared, and able, to fish in multiple areas.

Areas everywhere change frequently, there is no answer to this question. Current IOM management seems to be built around making vessels inefficient which greatly increases the costs of catching scallops there, this detracts from the fishery and I am unsure who it actually benefits - it is a very strange concept particularly given the economic viability focus of this consultation. Another thing that current management does do is increase carbon emissions, this could be reduced with no detriment to the stock, and it would also increase vessel profitability.

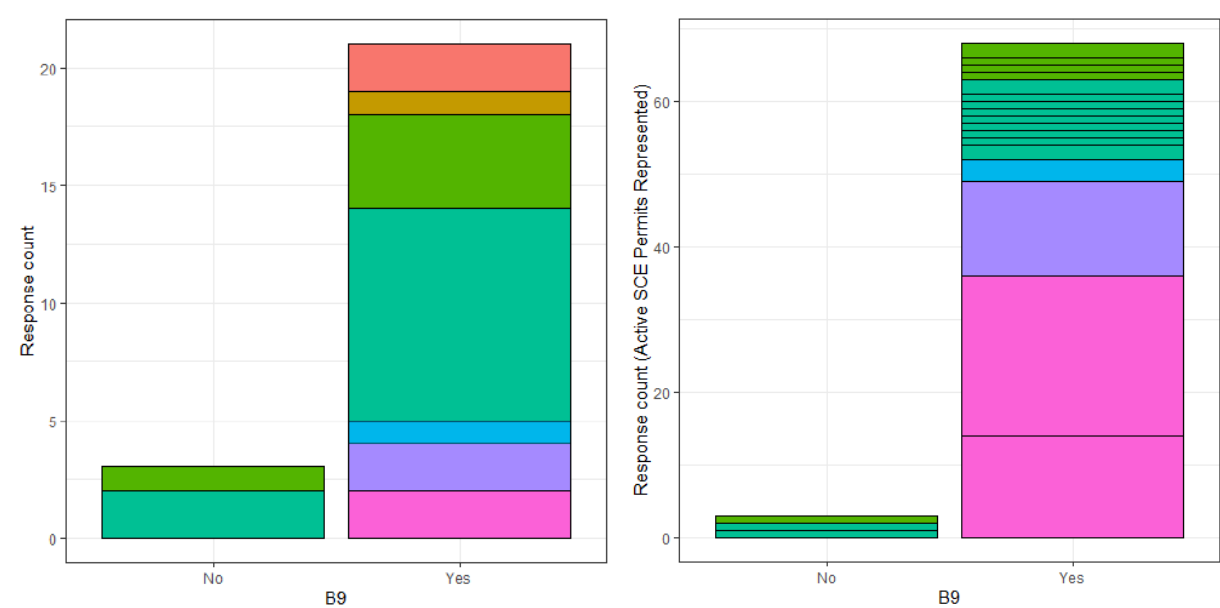
QB.8 Do you agree that there is a need for a long-term management plan (LTMP) to improve the state of stock(s) and deliver sustainable economic benefits in the Isle of Man scallop fishery?



Comments:

We support LT management planning with scope for revision.
Too many vessels
For all the reasons in previous answers
The current regime is not working. There are simply too many boats chasing the available resource. We also have a fishery that is dependent on annual recruitment.
The fishery has been good for decades with prudent sensible management, along came the relatively recent micro-managing and if what you say is indeed the case it seems to be degenerating into an economic basket case, this saddens me.
A sensible management plan would be great but it needs to take into account all stakeholders and the socio-economic needs of all of these stakeholders, not just small vessels or IOM vessels - nor should it discriminate against some non IOM interests as this current consultation has set out to do.

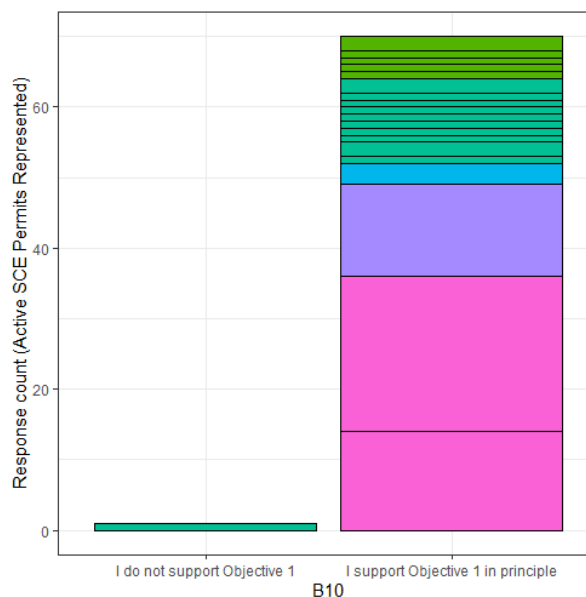
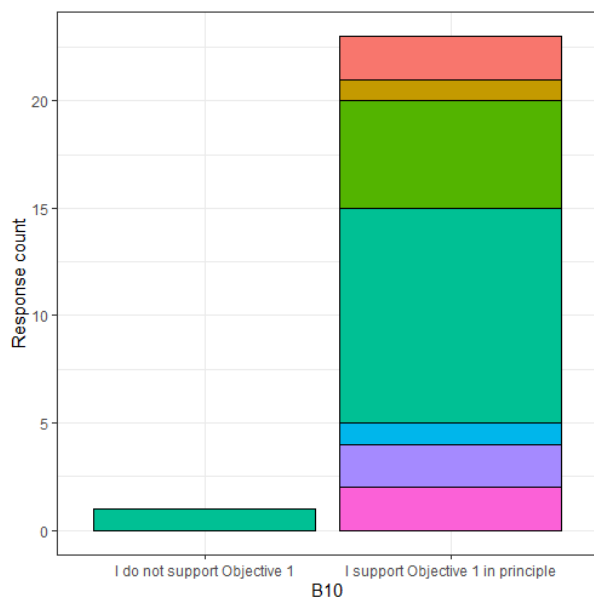
QB.9 In principle, do you support the development and implementation of a LTMP for the Isle of Man scallop fishery?



Comments:

The need to remove high power vessels
There needs to be a LTMP to improve the stock, improve the economic viability of those that depend on the fishery, achieve a sustainable fishery and to protect the marine environment from the effects of overfishing.
A sensible management plan would be great but it needs to take into account all stakeholders and the socio-economics of all of these stakeholders, not just small vessels or IOM vessels - nor should it discriminate against some non IOM interests as this current consultation has set out to do.

QB.10 In principle, do you support industry High-level Objective 1: Restore and maintain good stock status and achieve long-term stability

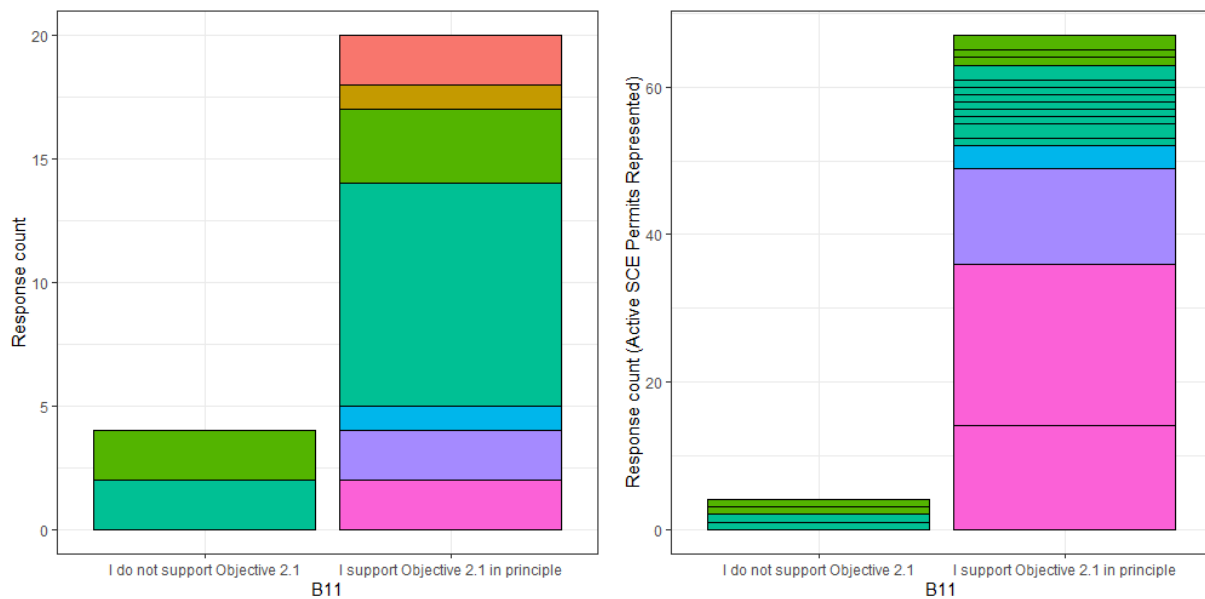


Comments:

This realistically can only be achieved through a reduction in potential effort.

Irish Sea shellfish stocks have natural cycles, they always have done - you will not manage these natural variables out of the fishery no matter what you do. There will be boom years and there will be not so great years, sensible management would allow you to capitalise on the boom years allowing you to build in resilience for the lesser years. Before the era of micro-managing this was always the case and it seemed to work very well even with massively more fishing effort than there is nowadays.

QB.11 In principle, do you support industry High-level Objective 2.1: A Harvest Control Strategy (HCS) in pursuit and continuation of the above primary objective, which sets biologically sustainable limits on fishing activity, informed by robust/best available scientific stock data linked to biological reference points (limit and target reference points).



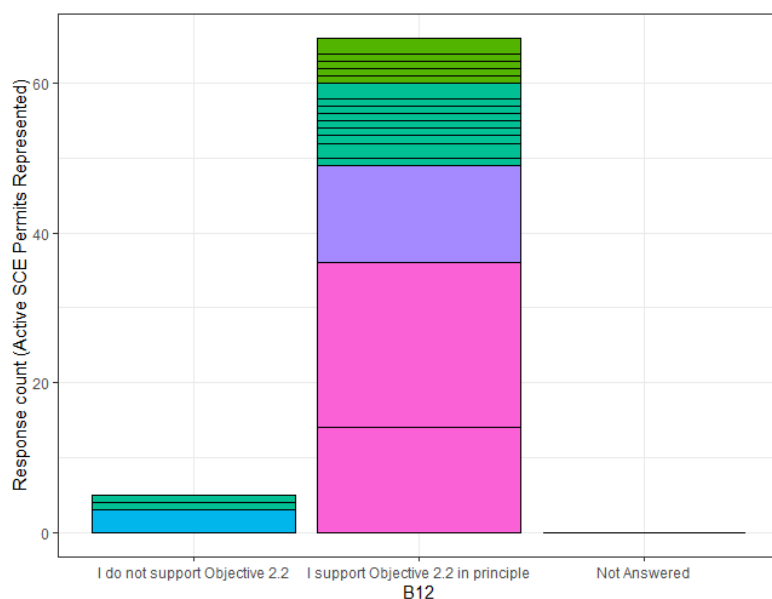
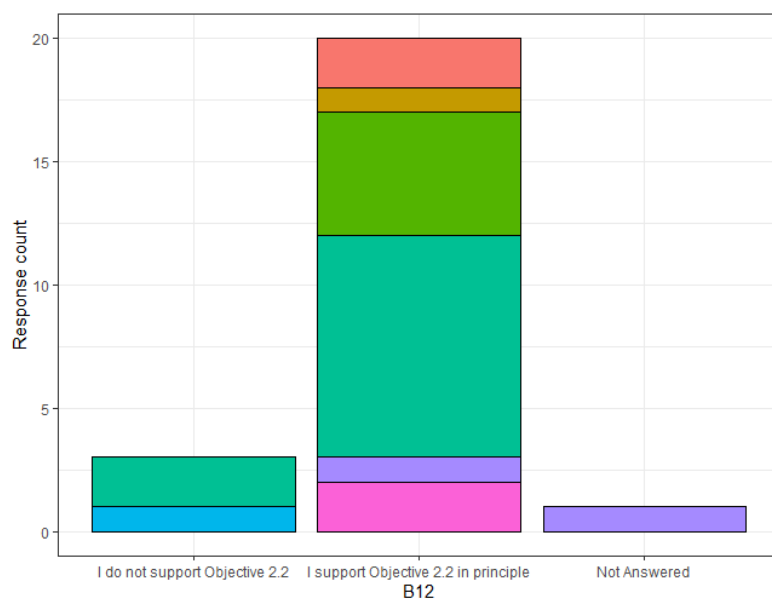
Comments:

Socio-economic factors must also be taken into account.

I would like to place great faith in the science/data involved here but events of recent years make this very difficult. Setting anything in stone on such a fluid and dynamic situation is a dangerous game, a game where genuine stakeholders may pay quite some price while those making or influencing the decisions have little or nothing at stake.

It appears that the IOM queenie fishery has been micro-managed into a sad parody of its former self - you would hope that lessons may have been learned on the back of this, time will tell.

QB.12 In principle, do you support industry High-level Objective 2.2: A Harvest Control Strategy (HCS) in pursuit and continuation of the above primary objective, which manages vessel numbers, access, and effort so that fleet capacity is economically viable within the limits set (in 2i), and with consideration of environmental, economic, and monitoring-control surveillance (MCS) requirements.

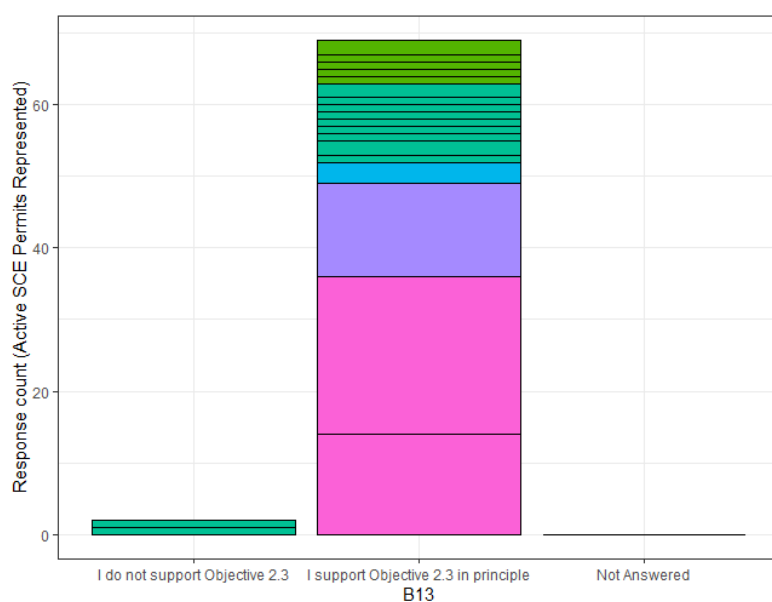
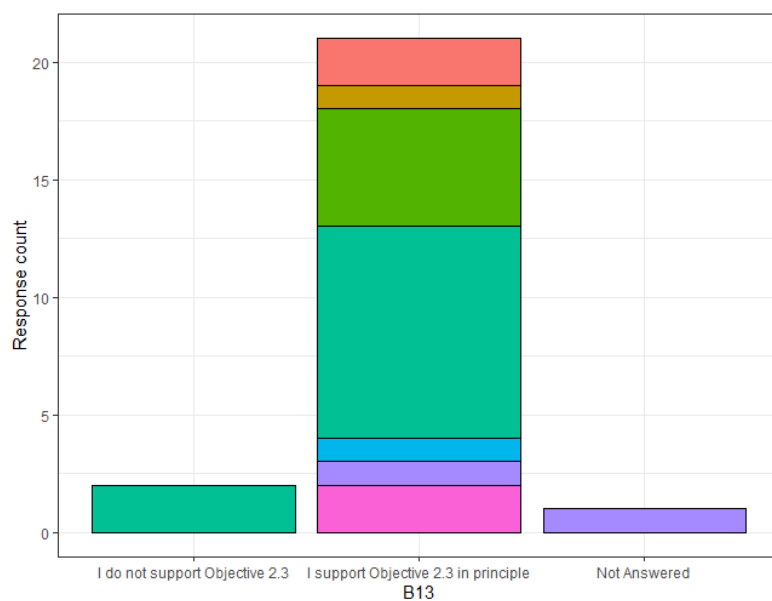


Comments:

This is essential for those that depend on the fishery for their livelihood.

Fishing effort has drastically reduced while it seems the problems and issues in the fishery have escalated, is there a link - who knows but it most certainly jumps out at you as something that deserves serious consideration. It is ironic that the consultation talks so much about the lack of economic viability while the current management regime is built around making vessels operate just about as uneconomically as possible - it sounds as if this is now starting to take a real toll on even Manx stakeholders, this is sad to see. You can beat about the bush and throw smokescreens around but forcing vessels to operate uneconomically which then unsurprisingly leads to them being uneconomically viable can't really come as any great surprise to anyone.

QB.13 In principle, do you support industry High-level Objective 2.2: A Harvest Control Strategy (HCS) in pursuit and continuation of the above primary objective, which utilises harvest control rules (HCRs) with defined limits that are effective, responsive, and enforceable.

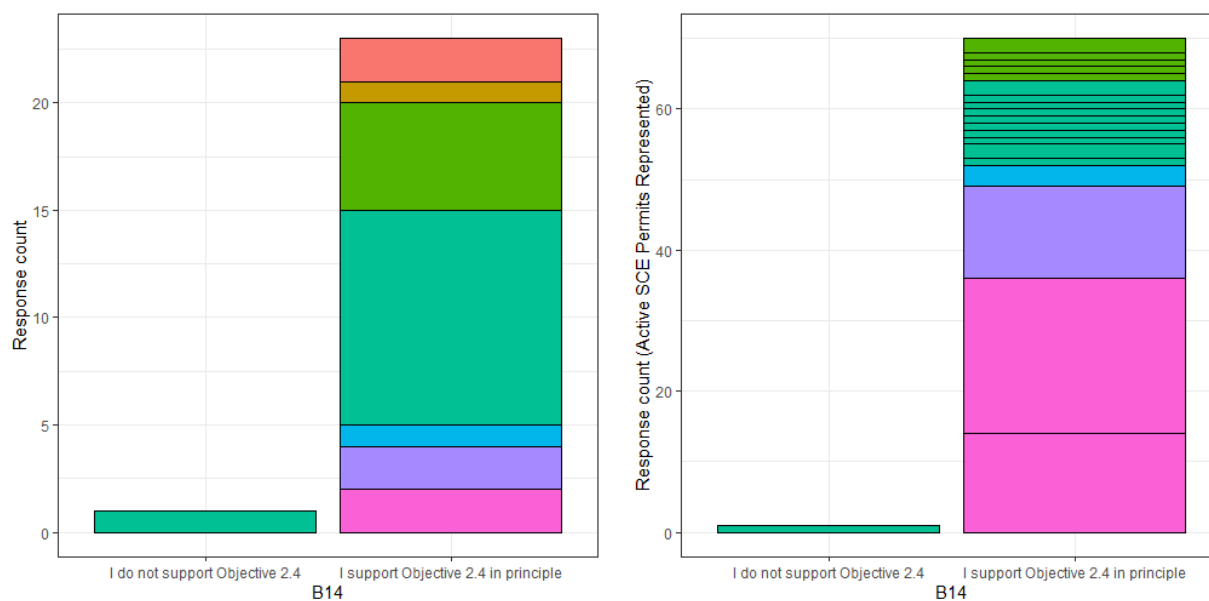


Comments:

They must also be economically viable

Limits are good if they are sensible and reflect the true state of the stock, in a fast changing fishery data lag can be and sometimes is a disaster - more so when people refuse point blank to accept what can be staring them in the face no matter what the collateral damage of that unacceptance may be. Scientific Data should feed into the management process but it should never be driving the process to the exclusion of other information.

QB.14 In principle, do you support industry High-level Objective 2.2: A Harvest Control Strategy (HCS) in pursuit and continuation of the above primary objective, which safeguards against poor recruitment.

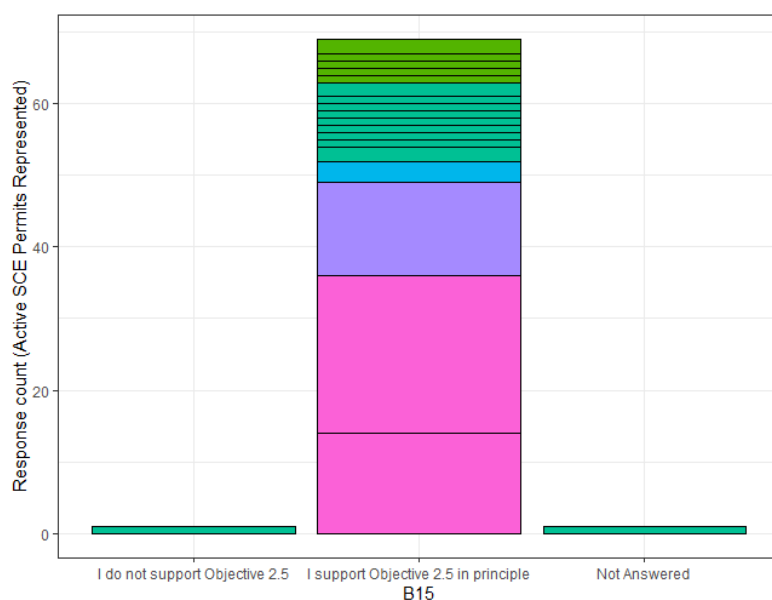
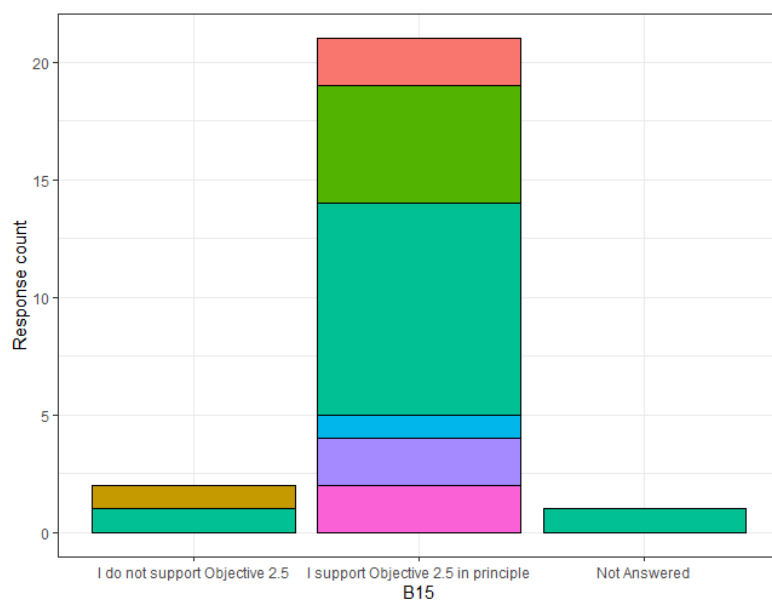


Comments:

The stock needs more resilience. This can only be achieved through a multi-year class stock.

I would have thought history to have shown that general Irish Sea scallop stock recruitment is relatively predictable, the natural cycle goes up for a period of years and then comes back down for a period of years.

QB.15 In principle, do you support industry High-level Objective 2.2: A Harvest Control Strategy (HCS) in pursuit and continuation of the above primary objective, which incorporates spatial management.



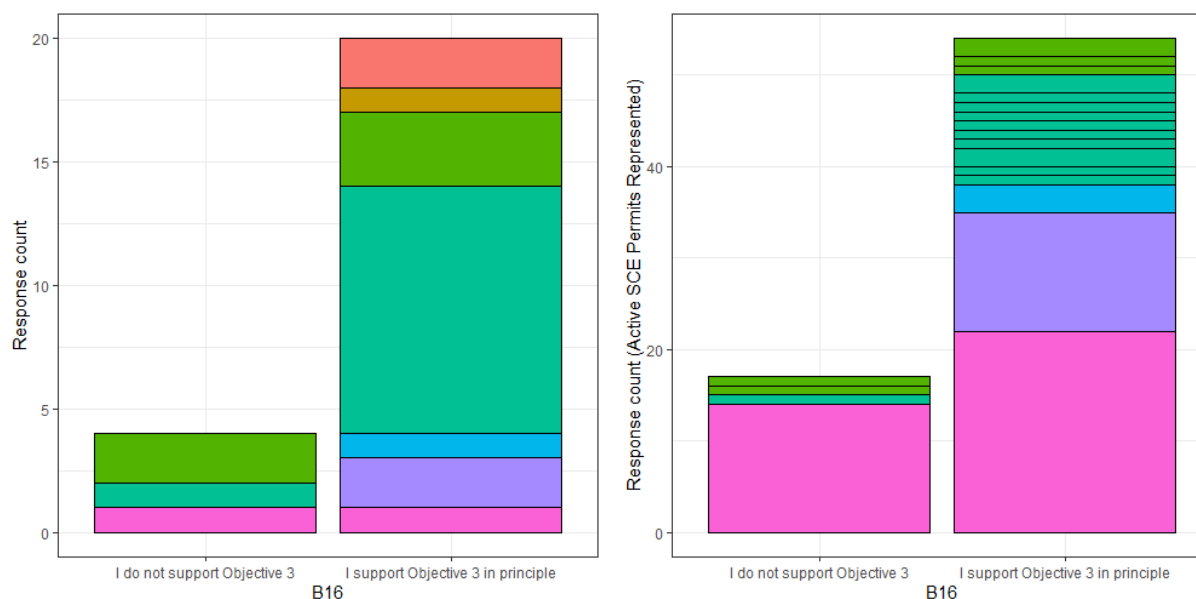
Comments:

If the number of vessels is right we should move away from closing areas to be opened a year or two later as it displaces effort towards those areas

Spatial management is a very useful tool. It can ensure that boats catch quickly, and with a DCL this reduces seabed impact. Closing areas to protect juvenile population's works but opening those areas must be carefully managed. Spatial management must have a purpose, be well-informed and the effects on displacement of effort must be considered.

Revolving closed boxes are a good thing for fishers. Permanently closed boxes are not, there are plenty of agenda driven theories to the contrary but rarely if ever do they translate into real world benefits for fishers, either direct or indirect.

QB.16 In principle, do you support industry High-level Objective 3: An environmentally-considered fishery, following an ecosystem-based approach.

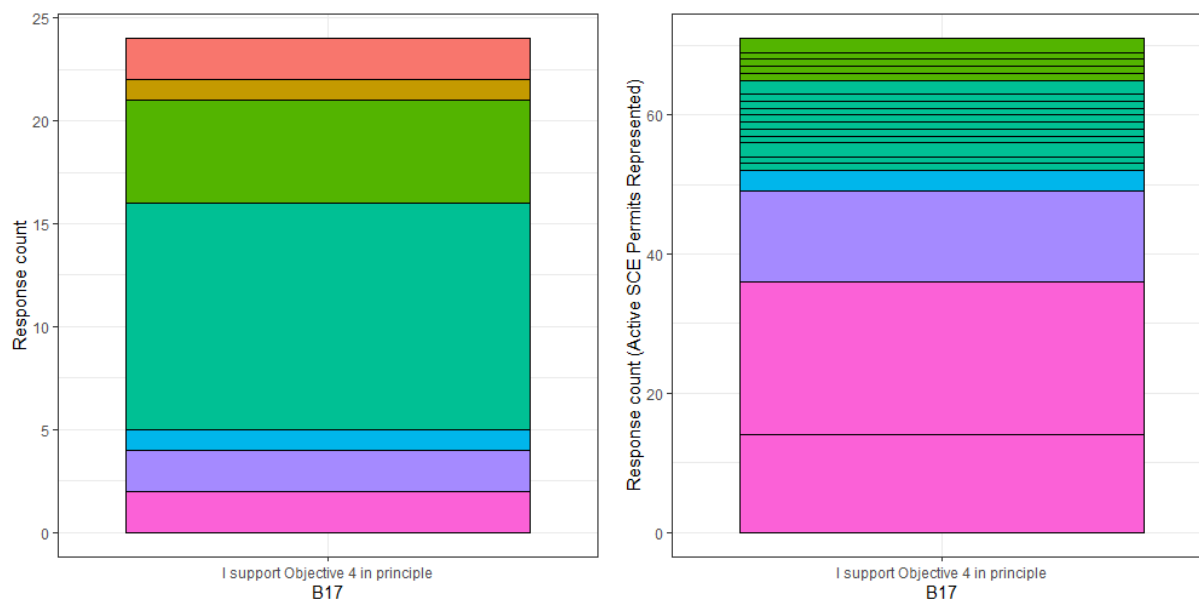


Comments:

Emphasise whole ecosystem impacts including computation of swept areas related to landings and quotas. Taking an ecosystem approach safeguards economic benefits and reduces carbon loss from the sediments.

All industries need to respect the environment. This is becoming far more apparent and necessary in recent years. The fishing industry in the MTS has made huge improvements over the past 5-6 years through a reduction in fishing days within the MTS. This needs to continue and can only be done by matching the number of boats to the available resource. This then leads to a more efficient fishery and less sea-bed contact time which in turn greatly reduces the impact on the marine environment.

QB.17 In principle, do you support industry High-level Objective 4: A high-quality seafood product, produced sustainably, that delivers market access and maximises stakeholder economic return.

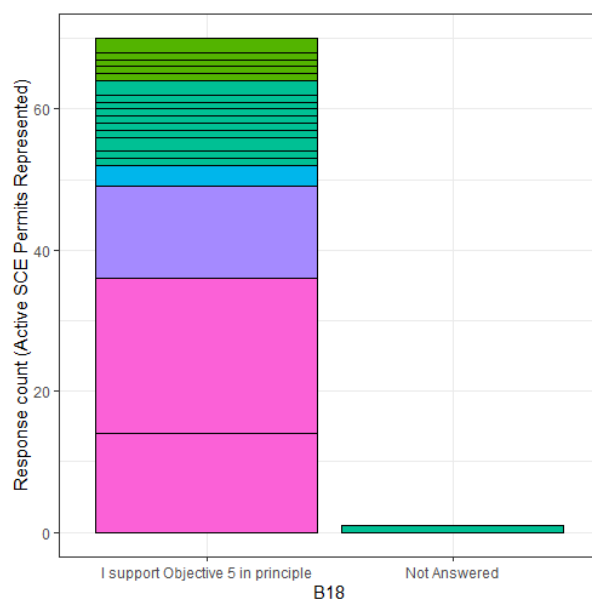
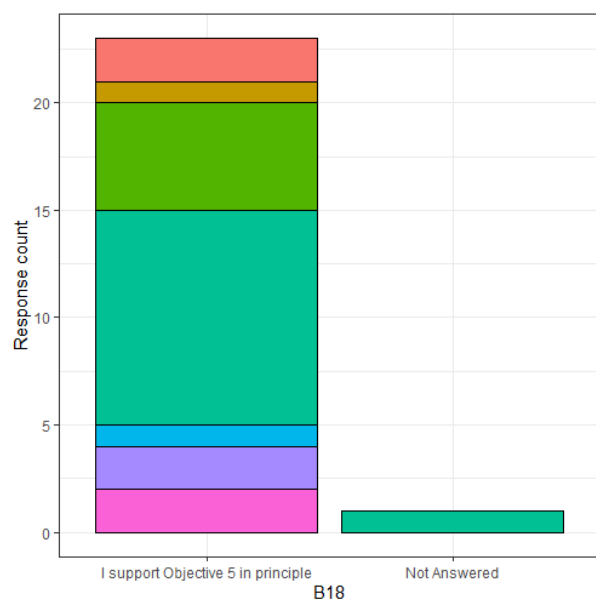


Comments:

A mobile gear, bottom trawling industry could never be sustainable.

If we manage the fishery so that there is a multi-year class structure, then for a given catch less scallops will need to be landed. This reduces the impact on the stock and the sea-bed, will lead to an improved yield and will help to ensure a high-quality seafood product.

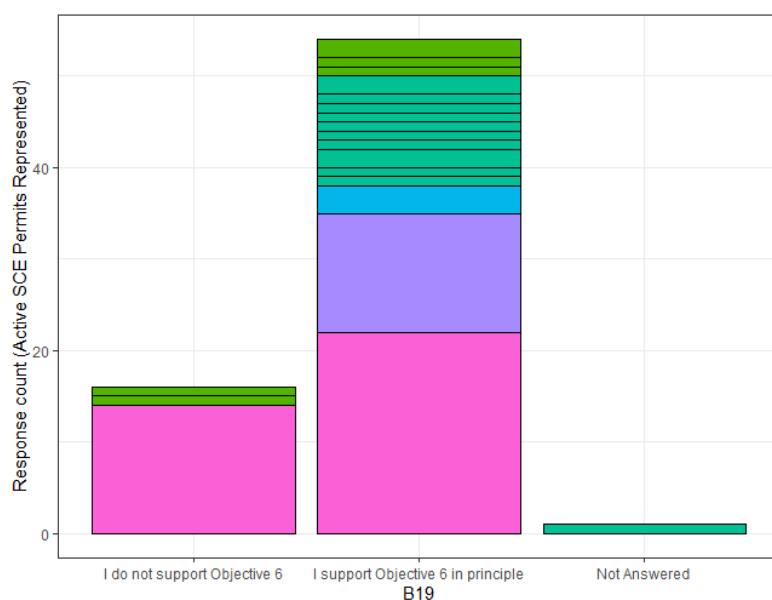
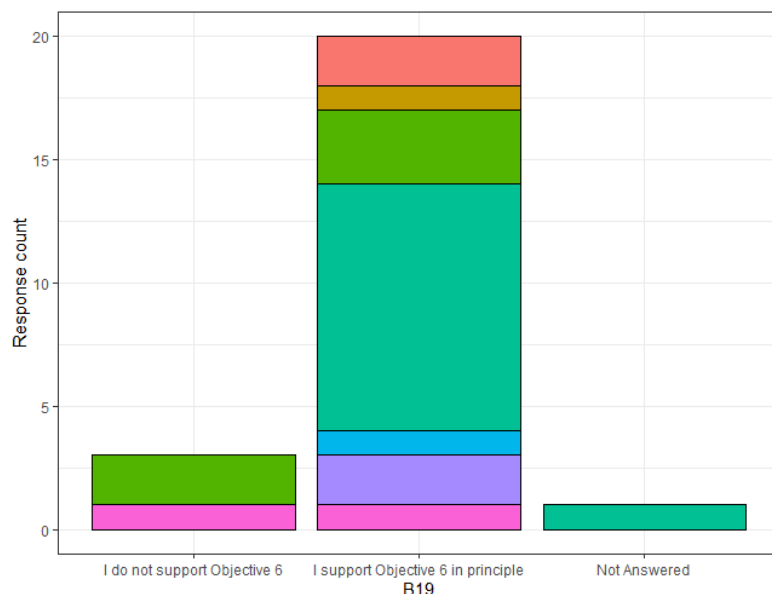
QB.18 In principle, do you support industry High-level Objective 5: A high level of safety and wellbeing for those people working in the industry



Comments:

This is an essential part of the socio-economic improvement within the fishery. If we can achieve this then we will have matched effort to resource.

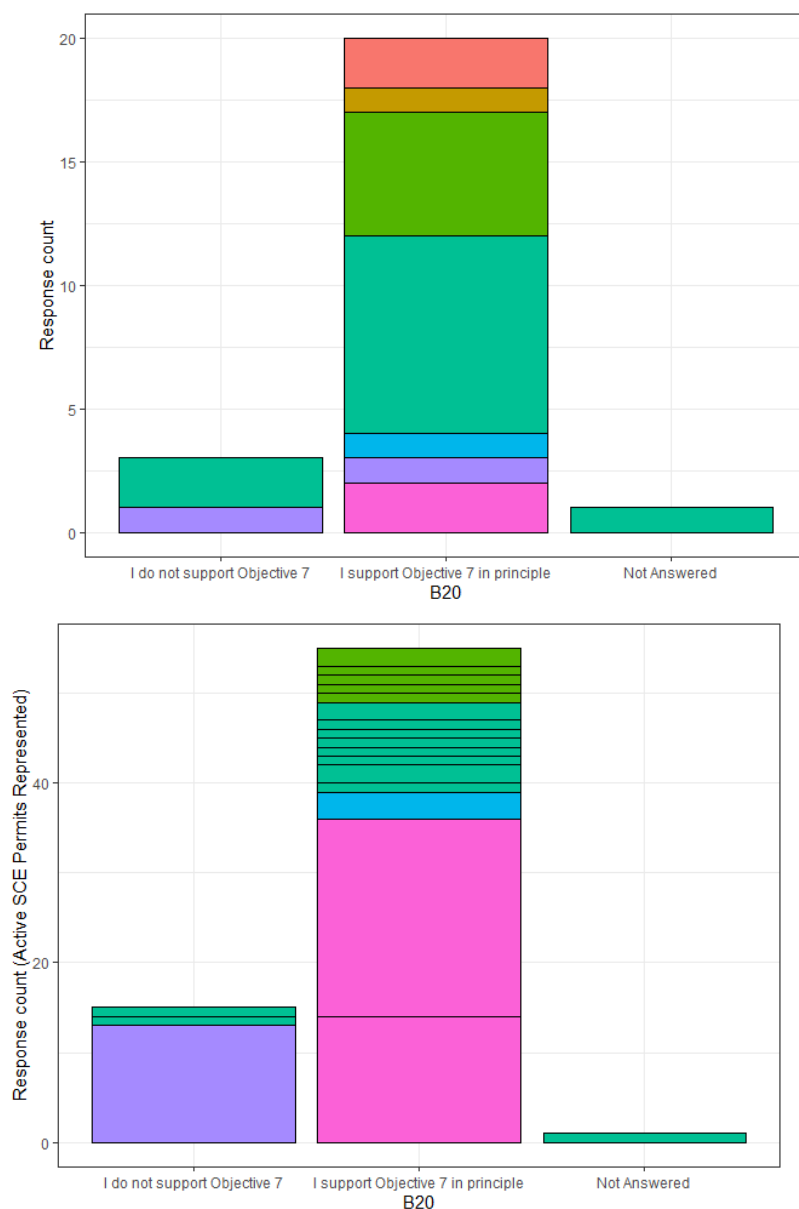
QB.19 In principle, do you support industry High-level Objective 6: An energy efficient fishery



Comments:

Quite laughable when much of the catch is exported far beyond our borders.
This is key point with many opportunities and should include the whole processing, transport and marketing chains.
In the long term, yes I support this , in the short term, it would be very expensive to make energy efficiency better,
The first step in this is to increase catch rates through stock improvements. Then, with a DCL in place, there will be less fishing time needed for a given level of catch. This will reduce the carbon footprint of the fishery. In the future there will be developments for replacement of diesel powered craft.
The current regime including daily quotas must be among the most energy inefficient fisheries that there is. Daily quotas are a dreadful concept from an energy efficiency perspective with easily avoidable carbon emissions to match.

QB.20 In principle, do you support industry High-level Objective 7: The fishery (and stock) is considered in relation to marine spatial planning, marine developments, and wider fisheries management.

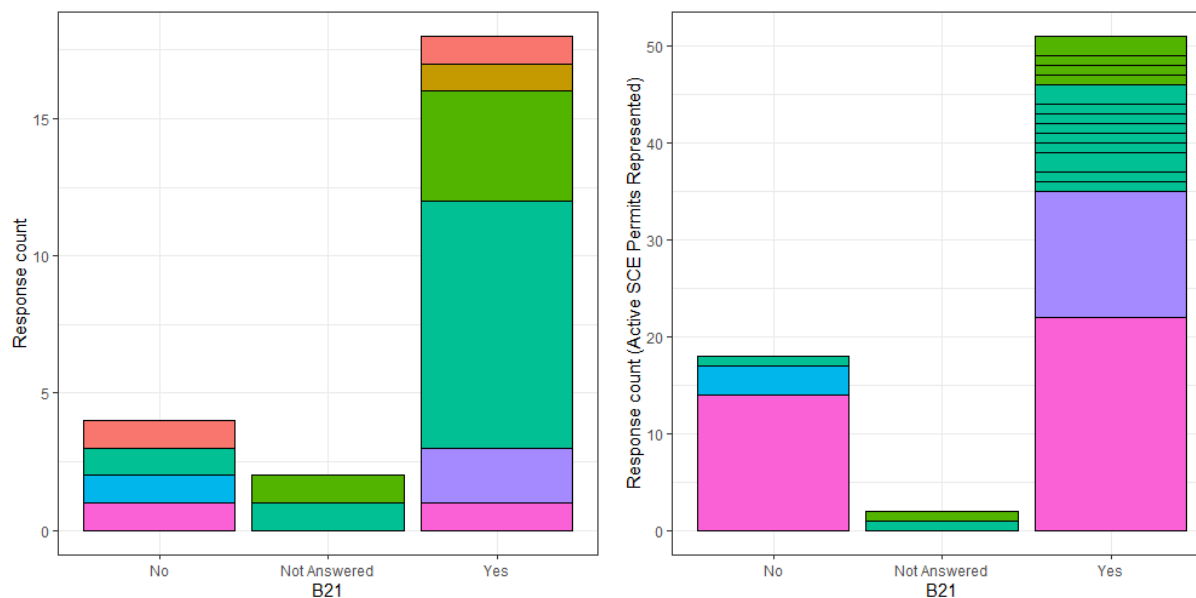


Comments:

I feel the fishery should be the priority and all other developments/marine spatial planning should be secondary

Marine spatial planning, marine developments and wider fisheries management must also consider the current fishery and the stock. It is a two-way process. This is not the case at the moment and displacement of fishing effort is seldom seriously considered.

QB.21 The SMB has highlighted objectives 1-5 as high-priority, and objectives 6-7 as secondary priorities. Do you agree with the SMBs prioritisation?



Comments:

Objective 6 should also be included in the priorities list. Tackling climate change and reducing carbon emissions are key targets for everyone, including the IOM Government.

There has been much thought put into the objectives. The first 5 priorities are those that can be achieved quickest through appropriate management. The other 2 will follow along as part of the process.

Energy efficiency should also be a high-priority, you can't really play on economic unviability in part of the consultation while hugely contributing to exactly that with some management measures making vessels inefficient. The carbon footprint of fisheries will come under ever more scrutiny, it will become increasingly important for vessels to operate as efficiently as possible.

QB.22 Do you have any other ideas, or suggestions, to include in the High Level Objectives for the fishery

Comments:

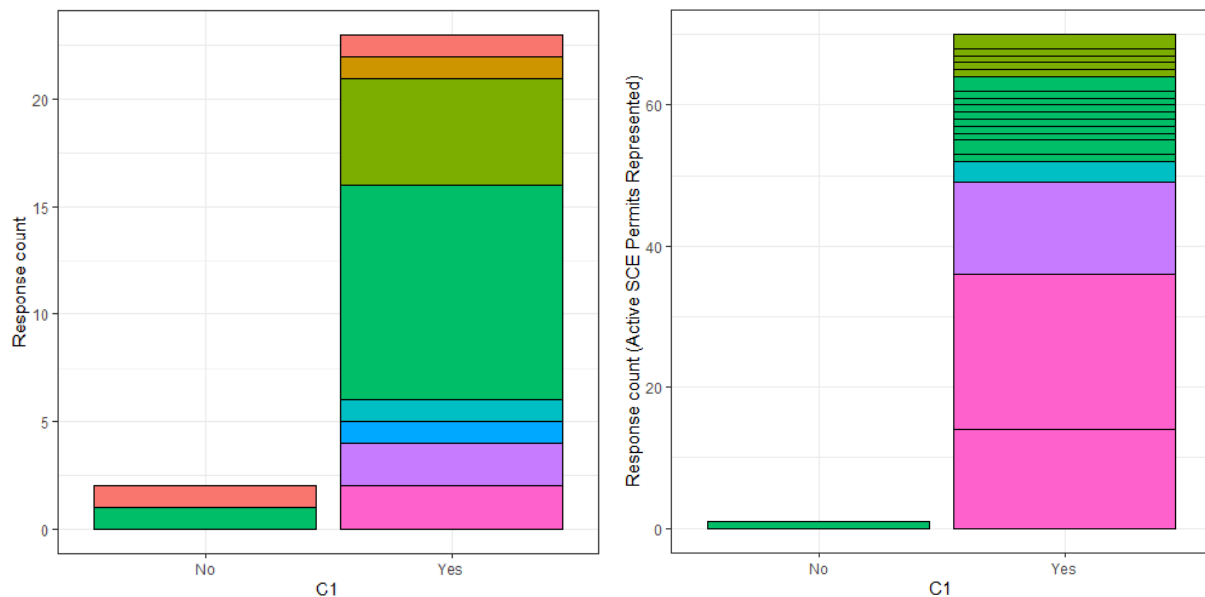
A complete ban on mobile gear bottom trawling in Manx waters should be introduced. The ecological and climate-related negative impacts from this wholly unsustainable fishing practice far outweigh the short-term, economic gain. A method of fishing that is hard to beat for its ecologically destructive power is not acceptable anywhere, let alone in a so-called Biosphere nation.

Reduce the fleet, reduce size of vessels and reduce the high power automatic vessels
--

A weekly bag limit instead of a daily bag limit. This would have an economic and environmental benefit as less time would be spent steaming to and from the harbour to fishing grounds.

Section C – Co-management and the LTMP

QC.1 Do you agree that a LTMP for the Isle of Man scallop fishery would be best implemented, and managed through a co-management system?



Comments:

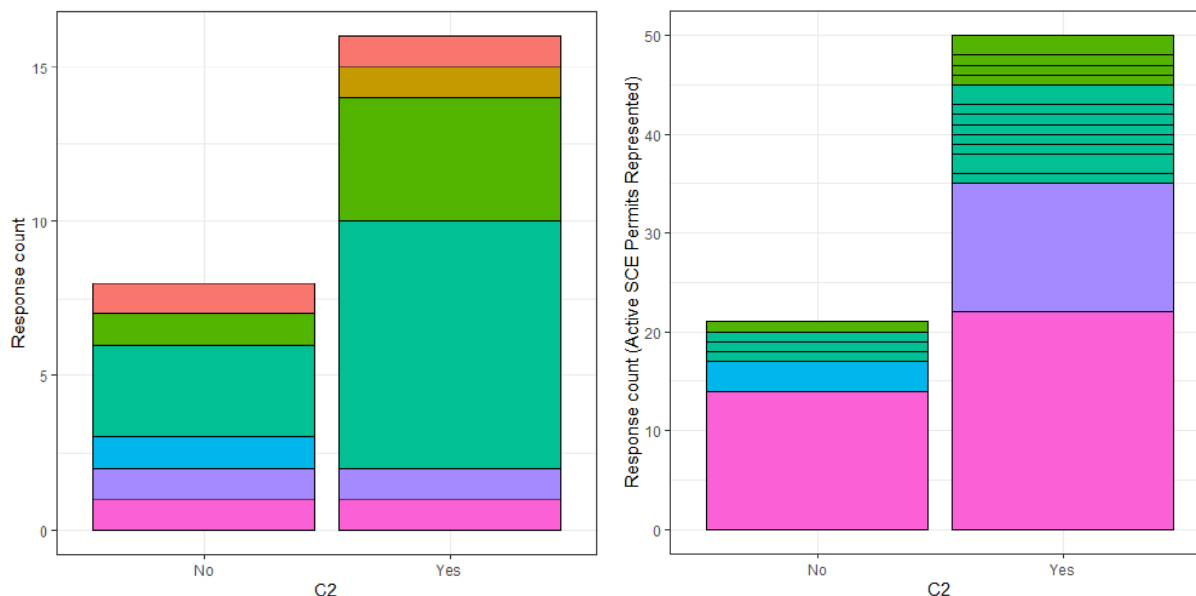
But should also include a marine conservation scientists and others with a marine economic interest.

The relationship between the industry and government has greatly improved over the last few years. There is a clear governance structure and the input of industry has been vital. The development of the industry-led high-resolution survey has greatly assisted the management of the fishery. The Scallop Management Board has been a vital part of the improvement in relations. This needs to continue.

It is essential that all stakeholders had representation in the system. The current SMB model is quite frankly disturbing in the way that some stakeholders are completely excluded. They have nobody reflecting their interests nor are their opinions ever asked for apart from in consultations such as this - usually once any decisions are well down the line.

I couldn't actually tell you who if anyone is meant to be reflecting my interests on the SMB - let alone ever having being asked my thoughts on anything for many years. It is like a closed shop secret society where so many stakeholders have no idea what is going on behind closed doors let alone be invited to have any input whatsoever.

QC.2 Do you agree that the Isle of Man Scallop Management Board is a suitable co-management forum to develop and progress a LTMP?



Comments:

But with wider consultation and participation, including other jurisdictions, working towards northern Irish Sea scallop stock management.

The SMB does perhaps need to consult more widely. There should be thought given to the use of invited experts (where needed) and contributions from the wider industry.

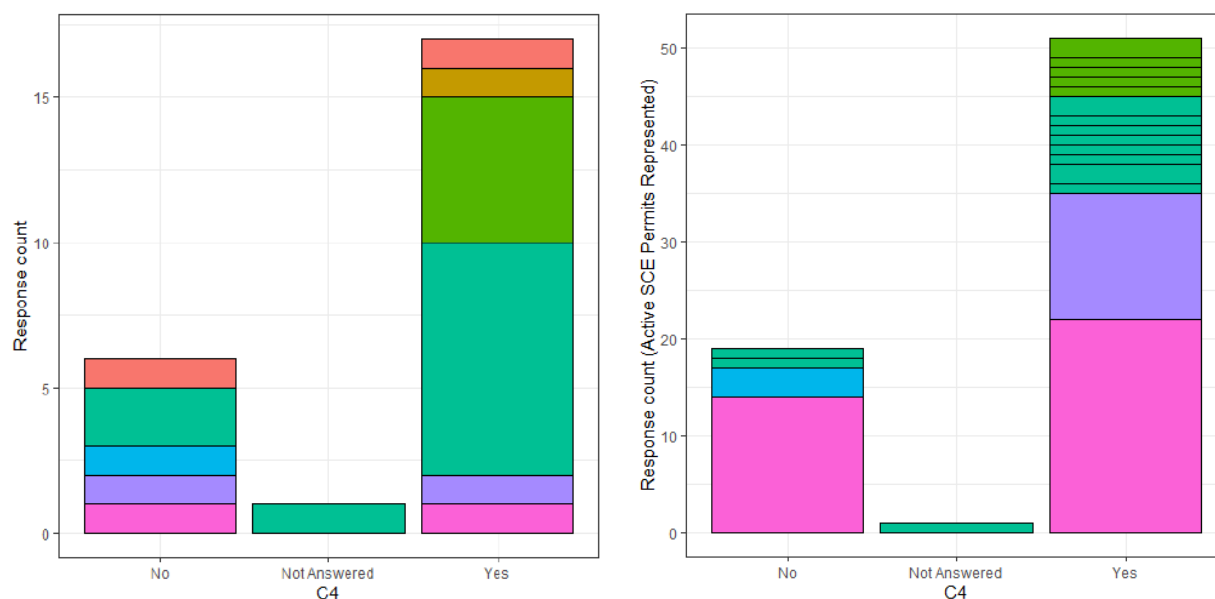
The SMB needs to be truly representative of stakeholders, currently it appears that this is not the case. If the SMB is being used to drive policy in a multi-stakeholder fishery then it needs to change in its make-up, one that recognises and reflects the interests of all stakeholders and not just the select few. Until this changes the SMB is not a suitable forum to influence management of the fishery.

QC.3 With a view to improving the performance in delivering the overall aims of the Isle of Man Scallop Management Board, do you have any recommendations?

Comments:

Ensure that the scientific data is fully heeded in setting TAC or quotas. Resources of the SMB may need to be increased to enable it to function efficiently.
Involve more local representatives and less overseas reps
No
More effort should perhaps to bring on occasion fishing interests who have 'reservations' about management along to SMB meeting to better understand the rationale behind decisions and future aspirations and ambitions etc.
The SMB does perhaps need to consult more widely. There should be thought given to the use of invited experts (where needed) and contributions from the wider industry. The structure of the SMB membership needs to be monitored to ensure it represents all interests. The SMB should never be a lobbying group but we do need to ensure we have the best knowledge available to be able to make informed decisions.
The SMB needs to be truly representative of stakeholders, currently it appears that this is not the case. If the SMB is being used to drive policy in a multi-stakeholder fishery then it needs to change in its make-up, one that recognises and reflects the interests of all stakeholders and not just the select few. Until this changes the SMB is not a suitable forum to influence management of the fishery.

QC.4 Do you agree that the current Isle of Man Scallop Management Board management recommendations process is an effective method of delivering a LTMP?

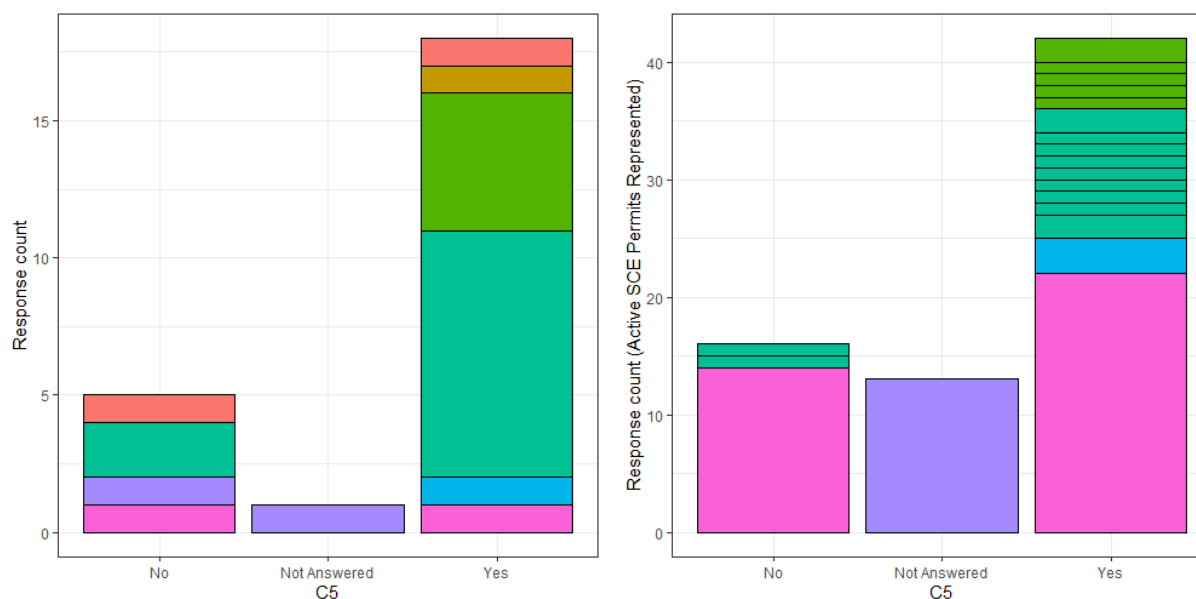


Comments:

The SMB has been involved throughout this process and therefore is the appropriate forum for implementation.

The SMB needs to be truly representative of stakeholders, currently it appears that this is not the case. If the SMB is being used to drive policy in a multi-stakeholder fishery then it needs to change in its make-up, one that recognises and reflects the interests of all stakeholders and not just the select few. Until this changes the SMB is not a suitable forum to influence management of the fishery.

QC.5 Do you agree that progress towards the LTMP should be evaluated by the Isle of Man Scallop Management Board on an annual basis?



Comments:

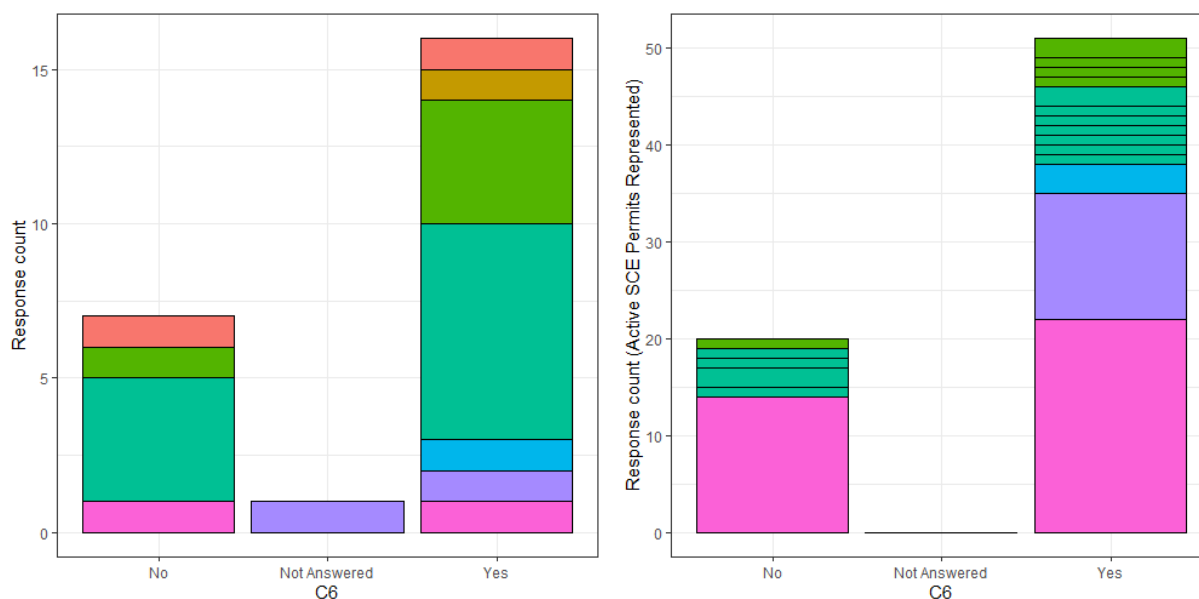
An annual review would help monitor progress towards LTMP

Of course, improving management systems is an ever evolving learning process and must be scrutinised to keep improving and refining.

This is done already as part of the discussions at SMB meetings and within the management sub-group. There is a continual appraisal of progress. Whether this needs to be stated as an annual evaluation I am not sure.

Yes - but the SMB needs to be truly representative of stakeholders, currently it appears that this is not the case. If the SMB is being used to drive policy in a multi-stakeholder fishery then it needs to change in its make-up, one that recognises and reflects the interests of all stakeholders and not just the select few. Until this changes the SMB is not a suitable forum to influence management of the fishery.

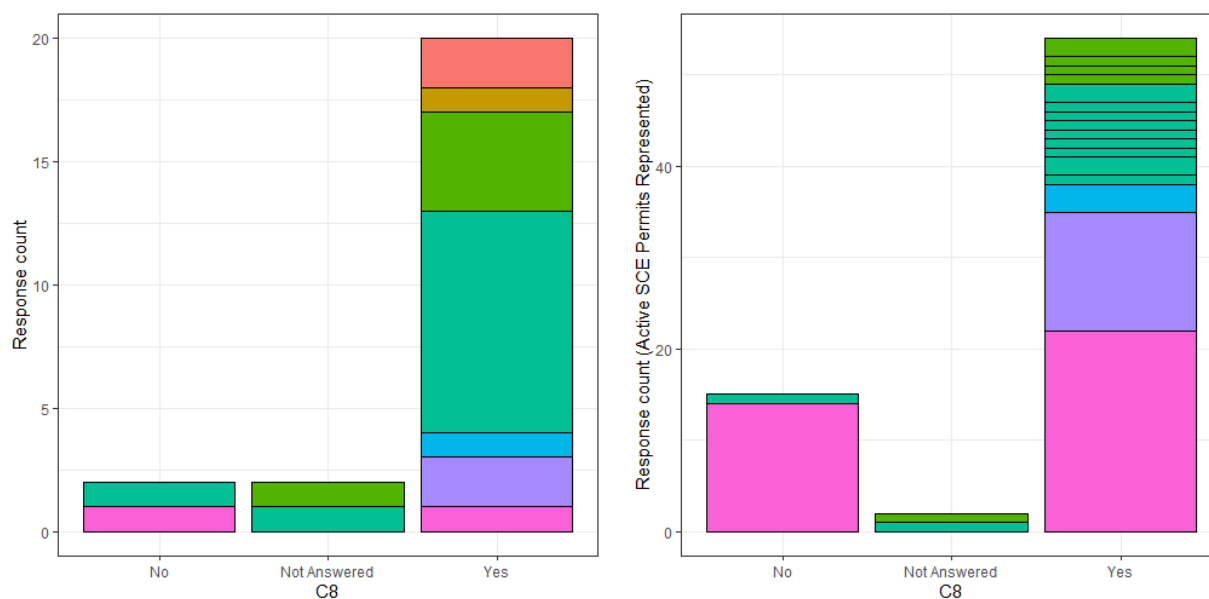
QC.6 Do you agree that the fundamental LTMP strategy should be reviewed by the Isle of Man Scallop Management Board on a multi-annual basis (to be decided)?



QC.7 How often do you think the LTMP should be reviewed?

A 5 year review is fine as long as the annual reviews mentioned above are undertaken.
I believe we must monitor the fishery/project on a yearly basis. There will be a time when as in 2008 and 2014 when we had huge settlements of scallops within the TS so we can react and take advantage of the situation or conversely protect it in the advent of poor recruitment.
End of each year
We have had a consultation in 2010, 2016, and 2021. There is also an IOM government led 5 year fishing strategy 2015-2020 which will soon be replaced by the next strategy. It is logical to have a fundamental review after 5 years.
It should be reviewed at least annually, this is a fast moving dynamic fishery and management needs to operate at the same pace.

QC.8 Do you agree that for the purpose of gathering stakeholder opinions relating to proposed Management Framework Adjustments for the Isle of Man scallop fishery (either before the 38 start of a season or during a season), the Isle of Man Scallop Management Board may include the use of survey tools (e.g. online SurveyMonkey/GoogleForms) to collect stakeholder perspectives on specific measures?

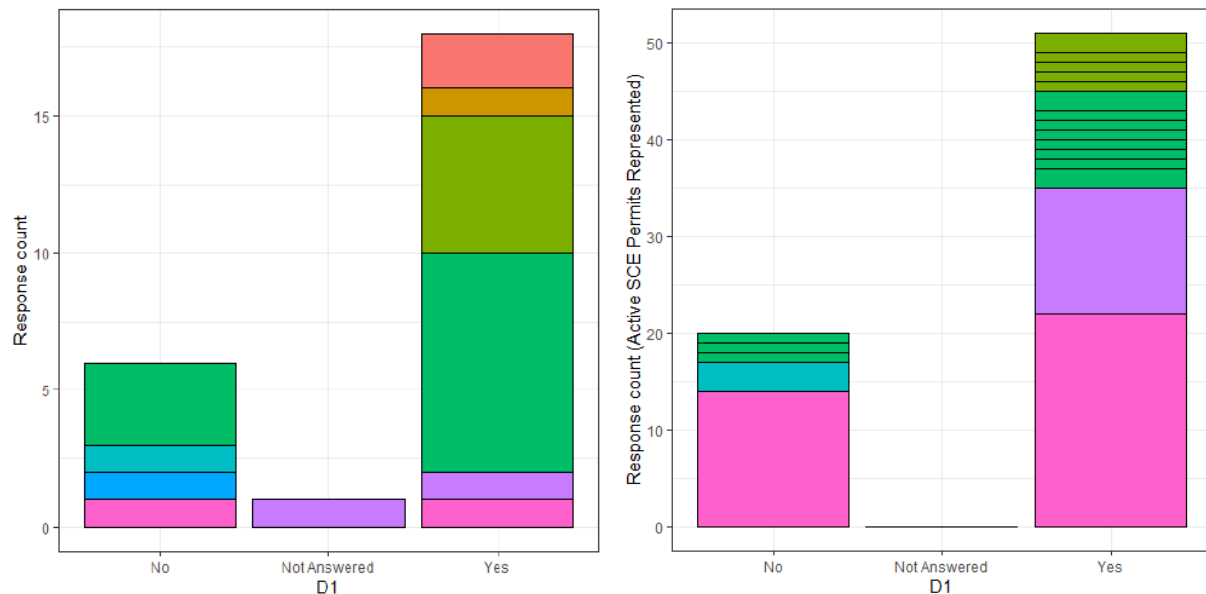


Comments:

Sometimes there will be a need for all stakeholders to have a chance to express opinions.
This is a fast moving dynamic fishery and management needs to move at the same pace.

Section D – Access and Fleet Capacity

QD.1 Do you agree that the current fleet capacity (83 licences), under the current access and management framework, i.e. without further input controls, is too great to allow for stock recovery, and economically viable scallop fishery for all of those vessels in the short-term?



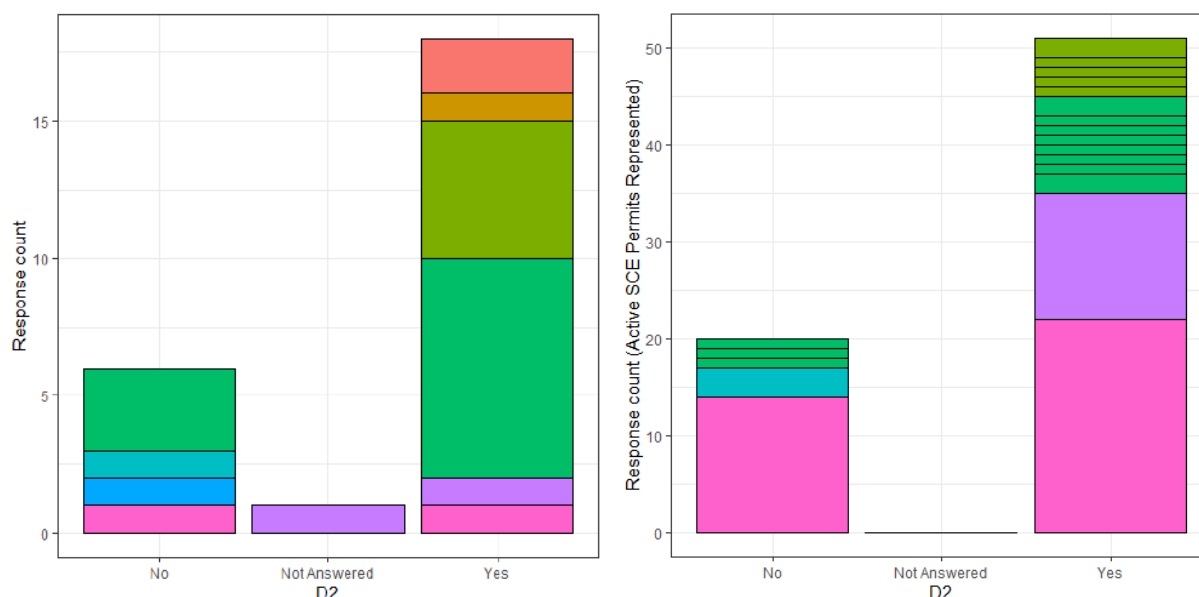
Comments:

There is too much potential effort. Any improvements in stock could be quickly fished if management measures are relaxed in line with a stock improvement. For example, any increase in DCL (as a result of stock increases) will result in more effort and any gains made could be lost. If we wish to have a stock no longer totally reliant on annual recruitment then there is simply too much potential effort available. The answer, with 83 licences, is never to increase the DCL to ensure effort remains manageable. This would mean uneconomic fishing for everyone. The fleet capacity therefore has to be reduced to prevent businesses that rely heavily on this fishery, from forever being in a position of economic uncertainty.

For decades (I have fished there for 40 years) the IOM fishery was always profitable, now going by this consultation it is not - I find this most odd given that the fleet and fishing effort are a fraction of what they were in even relatively recent times, reducing from 226 to 83 or less licenced vessels. The only other change apart from vastly reduced fishing effort is that the fishery is now micro-managed into dreadful inefficiency, this is obviously a handicap to economic viability. Your concern over economic viability is humbling but the biggest handicap toward economic viability has undoubtable been a management system designed to make economic viability very difficult.

History has shown that natural recruitment has and always will be the big driver in Irish Sea scallop stocks, we as humans are a sideshow when nature does her thing, we can tinker round the edges but we are but players in the real stock recruitment and recovery game.

QD.2 Do you agree that the current fleet capacity (83 licences), under the current access and management framework, i.e. without further input controls, is too great to allow for stock recovery, and economically viable scallop fishery for all of those vessels in the long-term?

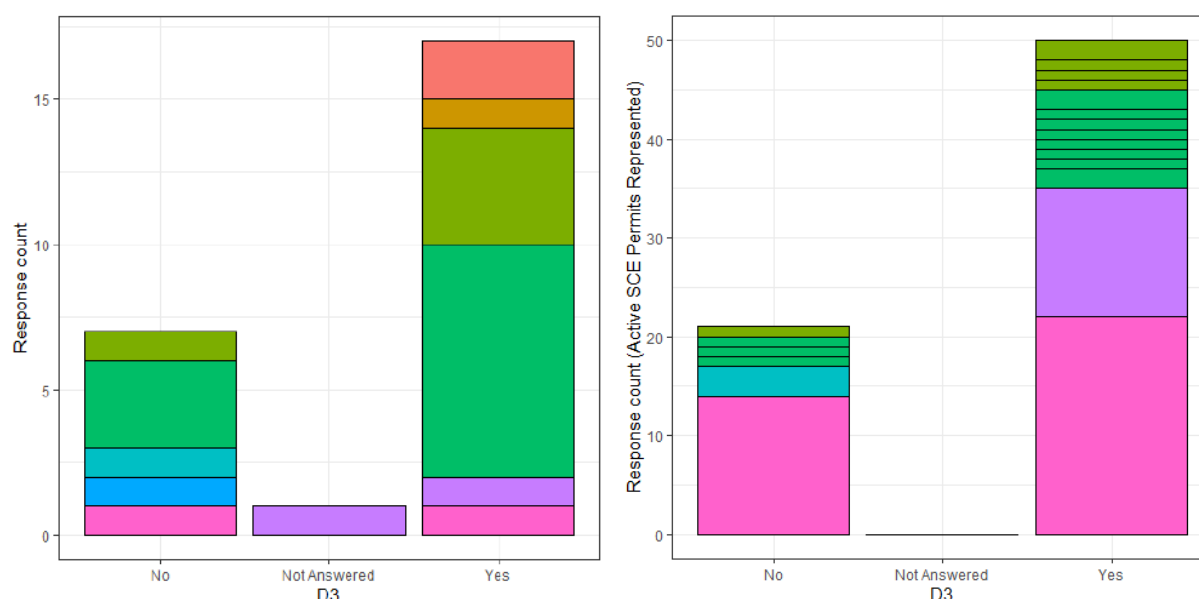


Comments:

The same argument applies for the short-term and long-term. With 83 licences the potential for increased effort is always there. Management will always have to be aware of that. With this level of licensed vessels recovery would be slower and tenuous. The potential effort must be matched with the available resource and that does not appear to be the situation as it stands. Natural wastage will gradually reduce the fleet but how long would it take to reach an appropriate level? It would simply be the survival of the fittest rather than supporting those businesses that rely on the fishery for the majority

Stocks recovered and a much larger number of vessels were economically viable when there were fewer restrictions, as restrictions have tightened over the years the issues seem to have escalated - I do appreciate that there needs to be prudent management but for the life of me some of these arguments bemuse me - unless of course it is an attempt to discriminate against some stakeholders and remove them from the fishery, I am trying hard to hope that this is not the case but this consultation and some of its content make that very difficult.

QD.3 Do you agree that the current fleet capacity (83 licences), under the current access and management framework, i.e. without further input controls, is too great to achieve the Scallop Management Board's agreed long-term objectives?



Comments:

There is currently a potential for an imbalance between current stock levels and fleet capacity if all 83 vessels participated in the fishery.

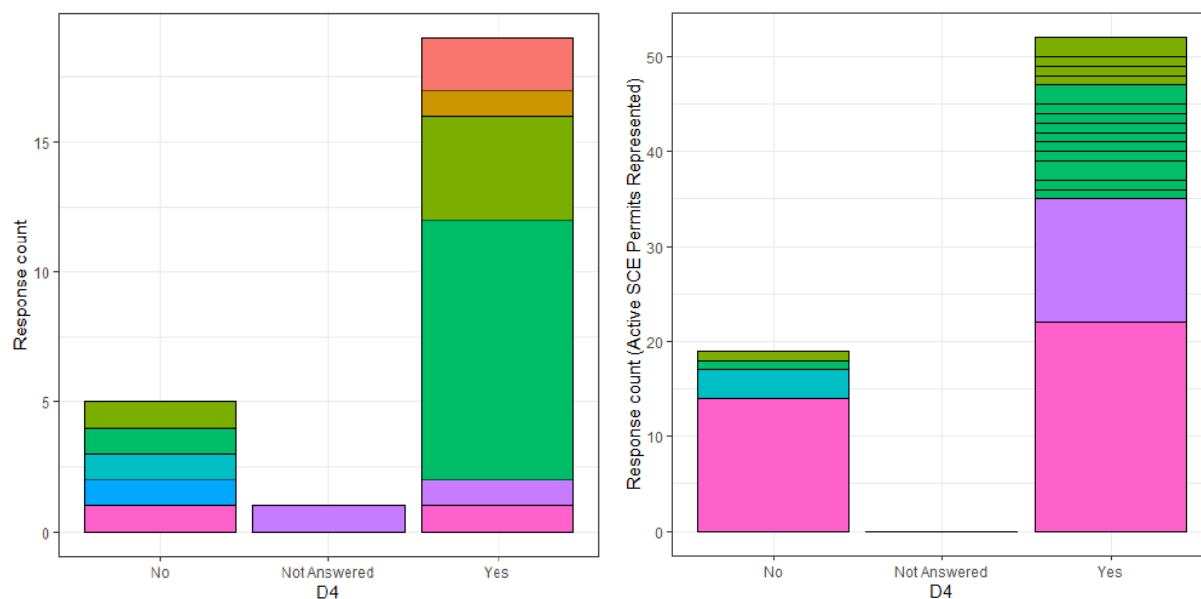
Also if stocks did improve to a degree, they would soon reduce at the current fleet capacity.

There is of course a quota, but if all vessels wanted a share, the divided up 'share' would be uneconomically viable for all.

There is simply too much potential effort within the licensed fleet. The MTS is already one of the most heavily dredged areas in UK waters. To achieve a sustainable fishery which respects the environment changes must be made. There is a need to remove the latent effort and manage the remaining potential effort in an appropriate and economically sustainable way.

I am beginning to wonder what the real objectives are here. The fishery happily supported over 220 vessels not too long ago, now 83 or less highly regulated vessels targeting the same resource are too many - seriously!

QD.4 Do you agree in principle that the current fleet capacity should be regulated at a level that allows for economically viable fishing for all participating vessels within the biologically sustainable limits, thereby allowing for progress towards the Scallop Management Board's Objective 1 and Objective 2.2?

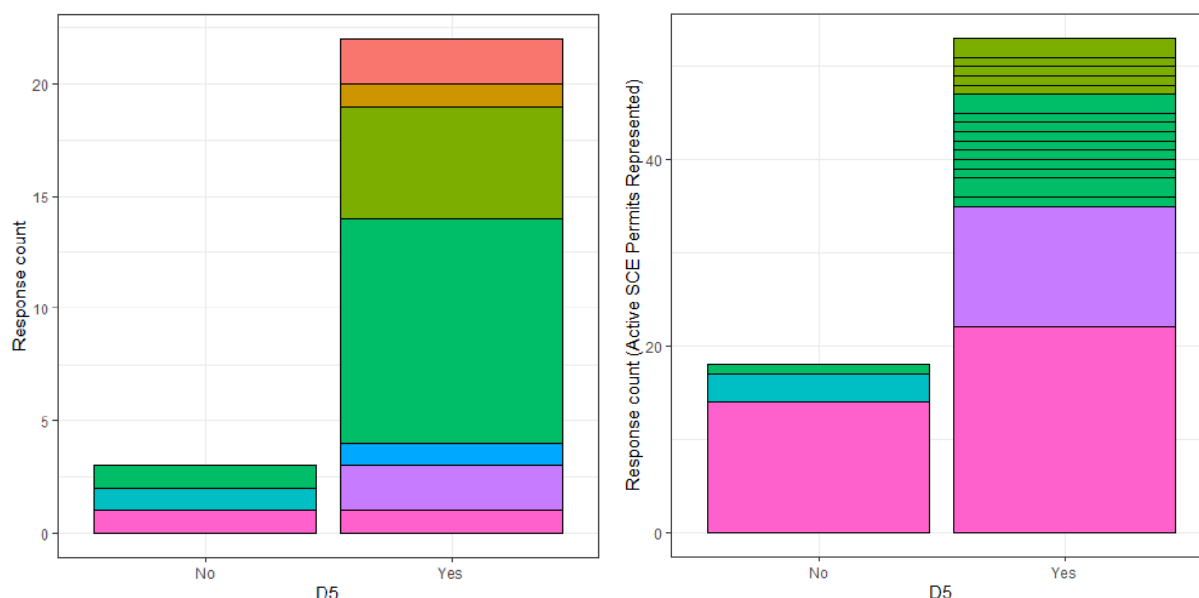


Comments:

Without matching effort to the available resource nothing else works.

I am beginning to wonder what the real objectives are here. The fishery happily supported over 220 vessels not too long ago, now 83 or less highly regulated vessels targeting the same resource are too many - seriously!

QD.5 In principle, do you support removing latency within the Isle of Man scallop fishery by reissuing licences to vessels with an appropriate track-record (to be decided) within a specified reference period (to be decided)?



Comments:

This is key to reduce boom and bust fishing.

Removing latency reduces the risk of stock depletion and makes it more economically viable for those that rely more on the fishery every year.

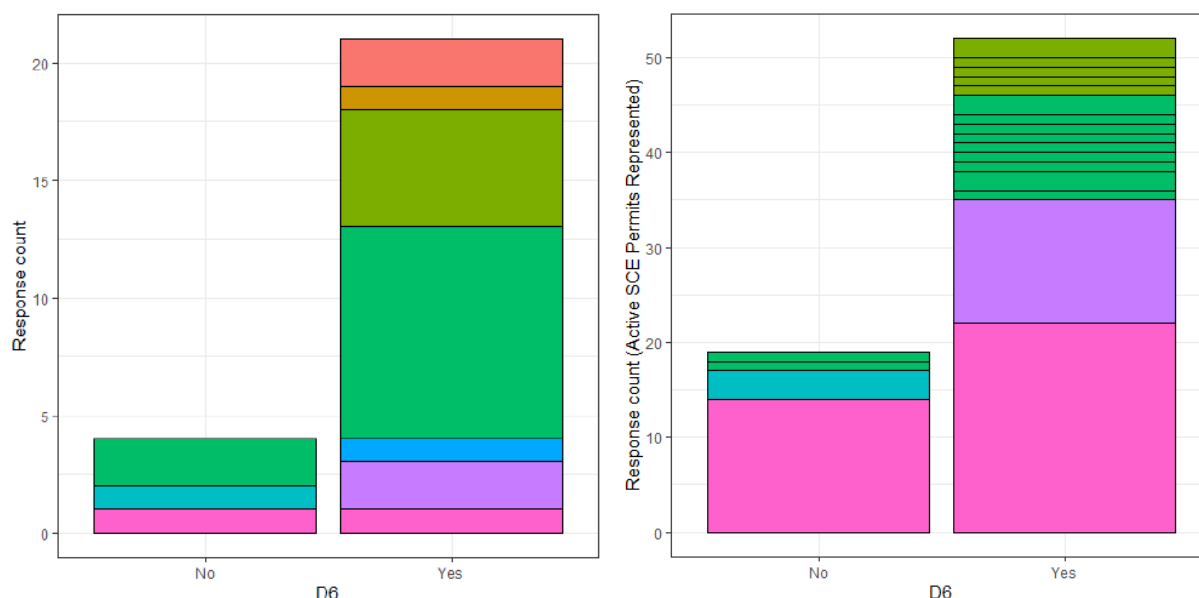
There are too many vessels for the available resource. Therefore there has to be some mechanism to reduce licences. Removing latency through track record is one of the most common methods of restricting or removing licences. Freezing latent licences is an alternative method. The issue is how do you decide which vessels are latent and under what criteria and what is considered an appropriate track record to demonstrate dependency on the fishery. The preferred track record and reference period makes sense. The fishery will always be managed with a DCL and 1st November 2017 (start of the reference period) was the date when the DCL (variable) was first introduced. If we consider track records before that period then this would not be relevant to the current management methods for this fishery. The end date coincides with the start of Covid when stay at home orders were first introduced.

It is inevitable that some vessels, who depend on this fishery as their main source of income, will lose their licence due to the track record as the reference period is relatively short. This could be due to periods of illness, long-term repair or refitting of the vessel, the vessel being bought within the reference period. All of these must be examined and checked through a robust appeals system to ensure we do not take away someone's livelihood.

The yes depends on the track record and reference period decided - this must take into account vessels who have found the fishery uneconomic since daily quotas were brought in.

The reference period needs to go back to way before 2017/18, starting from the 2013/14 season would be a fair and reasonable period to allow for those stakeholders forced to fish elsewhere once daily quotas were implemented.

QD.6 Do you support removing Species Specific Licences for king scallops from the Isle of Man Sea Fishing Licence where a licence-holder does not meet the above criteria recommended by the Isle of Man Scallop Management Board?



Comments:

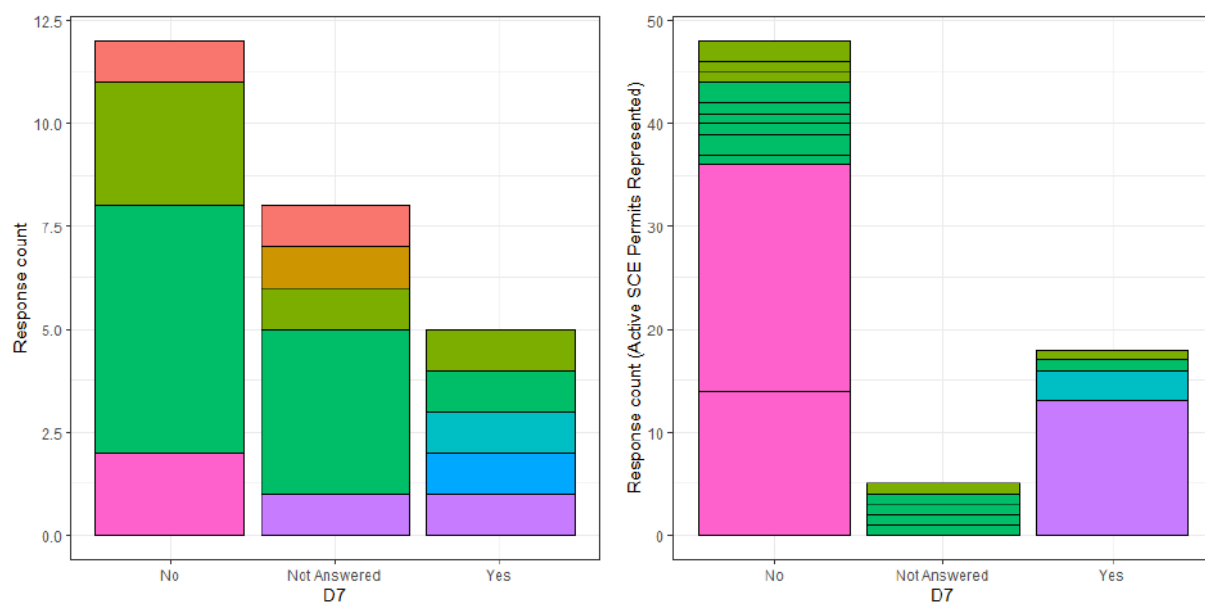
If a license holder hasn't met the criteria to keep the license it proves they're not as reliant on the fishery as others.

The SMB recommended that to qualify there should be a minimum of 54 fishing days within the reference period or 27 days within any one season. The 54 days equate to 10% of the total number of available fishing days. With any such recommended minimum level of fishing activity needed to qualify for a licence there must be a robust appeals system in place. No matter what level is set, each vessel fishes under different circumstances which are unique to that vessel and/or owner. There may be some valid reason why the number of fishing days have not been met - prolonged illness, vessel bought within reference period, lengthy repairs - and if this means that the vessel does not get a licence then an appeals system must be available to examine if the vessel has an acceptable reason for not meeting minimum entry requirements. Particular consideration should be given to those who have no other source of income for their vessel.

There should, perhaps, also be an opportunity for an owner of more than one boat to combine track records to permit one of their boats to have access to the fishery while the other(s) is removed. This would reduce the financial impact on that owner.

If people do not depend upon the fishery for part of their vessels viability then if anyone has to go they should be the first to go - unless there are genuine mitigating circumstances, one of which is the fishery becoming uneconomic for some vessels when daily quotas were brought in, any reference period needs to start well before this change influenced IOM licence latency.

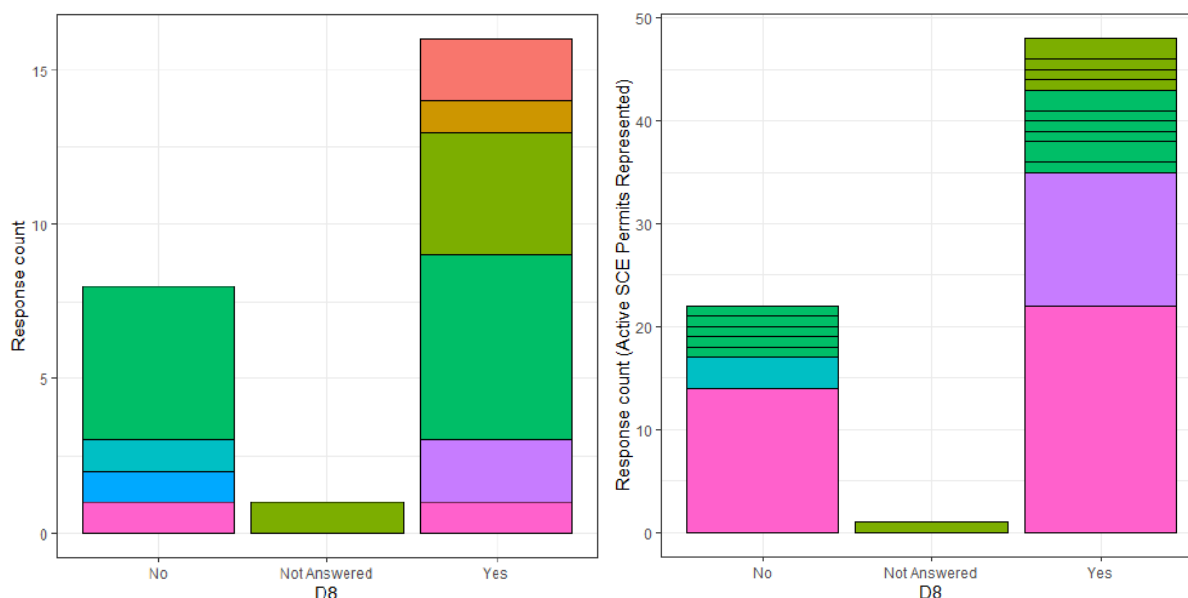
QD.7 If not, do you have an alternative proposal for either the track-record requirement, or reference period?



Comments:

Start of season 2013/14 onwards for the reasons given above.

QD.8 Option 1: Once latency is removed, and should the fleet capacity (i.e. number of vessels) still be greater than the long-term average landings could support, do you support reducing vessel numbers further without changing the access framework?



Comments:

We support option 1 because all options for managing fishing effort should be considered but option 2 seems a preferable approach, as it offers more flexibility to changing stocks.

As important as it is to have a sustainable fishery, without the boats being economically viable there is no fishery.

I'm unable to answer this until the effects of fleet reduction is known!

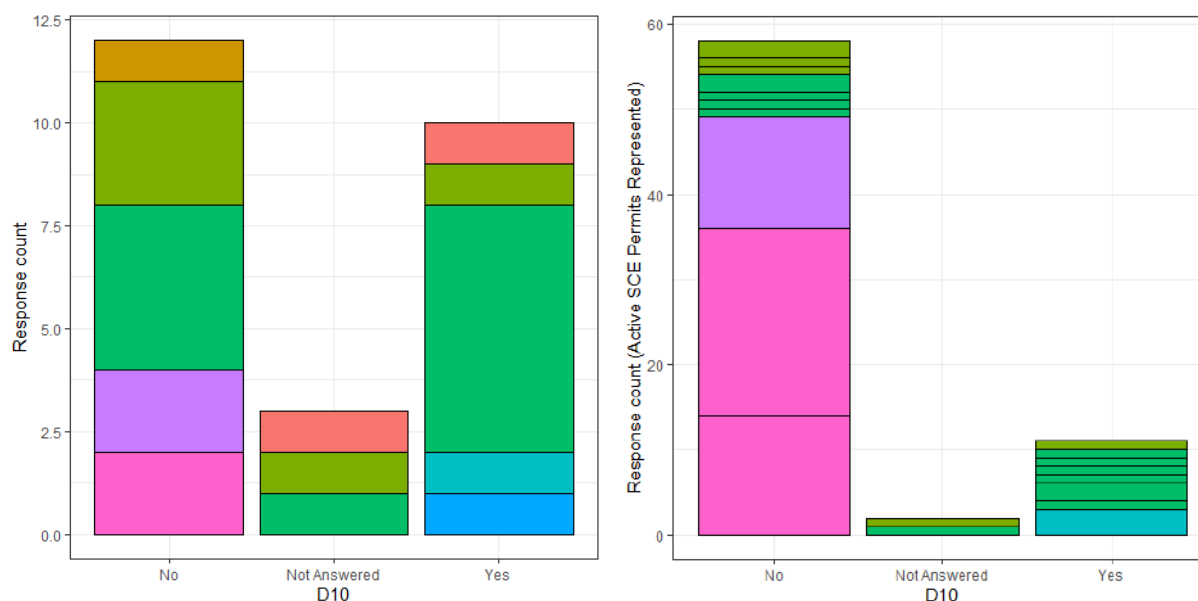
The MFPO do support further reducing the number of boats if it is considered that fleet capacity is still too high after a reduction. The question is whether this needs to be done immediately or should there be time for the fishing activity of the newly reduced number to be examined. The calculations within this document largely concentrate on the maximum number of full-time vessel equivalents. Fishing behaviour changes, costs reduce/increase, stocks outside MTS increase/decrease, other fishing opportunities develop or disappear. These all have influences on fishing behaviour within a given area particularly if the vessel is nomadic and has the ability to target multiple areas or multiple fisheries. Therefore there would need to be a period of data collection and examination of what a full-time equivalent vessel is within the new reduced fleet capacity. This would decide if further reductions are required.

I have no idea why an already vastly reduced fleet (from 226 lightly managed vessels in 2010 reduced to 83 micro-managed vessels now) suddenly becomes over capacitated to target the very same resource that for decades sustained a much larger fleet - much of the reasoning and assumptions in this consultation are very strange.

QD.9 If yes, which Track-Record criteria should then be used to determine vessel eligibility within the same reference period; 01/11/2017 – 31/03/2020?

The most popular method criteria was Total DAS; however average DAS per season and average DAS per calendar week were also highlighted by some respondents.

QD.10 In principle, do you agree that a Tier-based access framework for the Isle of Man scallop fishery, which makes provision for adjustable input controls, could be an effective mechanism for regulating fleet capacity?



Comments:

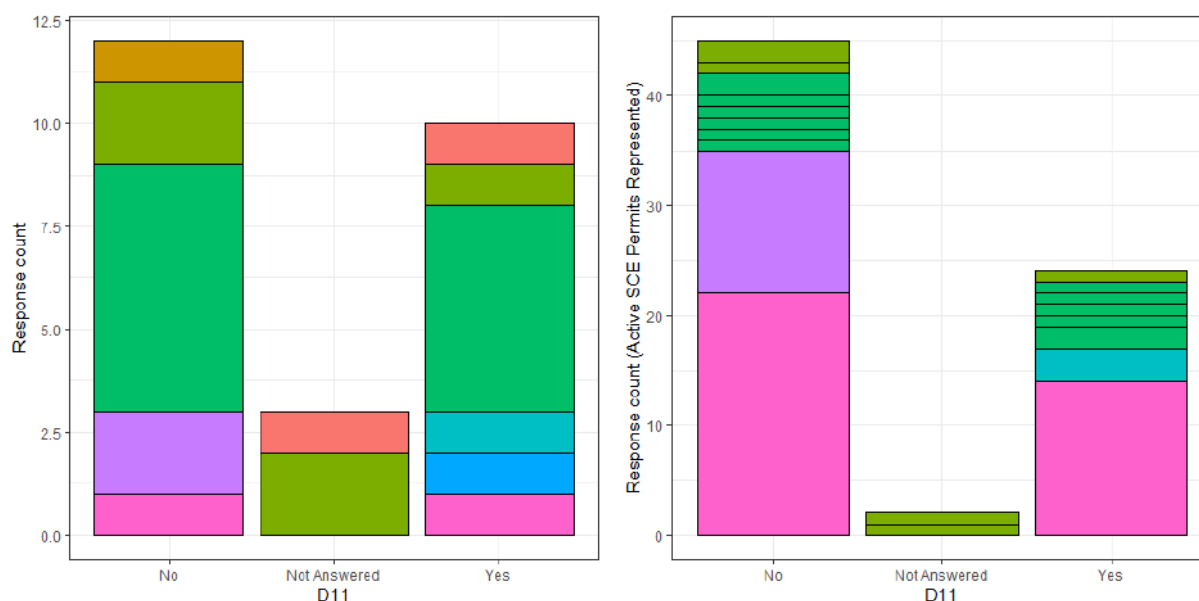
I think it should be an equal opportunity fishery where every participant has the same chance i.e, number of days, hours. Not the same amount of product.

It is a fair system, and in line with adaptive/flexible management - ever changing circumstances

This is not a straightforward question to answer. The opinion of the majority of MFPO members is that there needs to be a period of examining fishing activity and landings after any reduction in fleet capacity before any further effort regime (beyond that already used within the fishery - TAC, DCL etc.) is introduced. There were also some members who thought that an effort regime could work. A Days at Sea (DAS) scheme is one of the ways of reducing effort further (or at the very least controlling effort) and a Tiered system, which incorporates DAS could work. There are, however, many variables and difficulties within a tiered system. A period of reflection and of computer modelling with the new reduced number of boats would be needed to iron out problems with such a system. Therefore while the answer to this is 'no, the MFPO members do not agree with a Tiered system' it is a qualified no. Give the new reduced boat numbers time to settle into the fishery, collect data over a certain period and use this data to examine various 'models' on a DAS effort regime. Please note that with the UK Fisheries Act there is a requirement for all non-quota fisheries to be managed sustainably. As such, there may be a DAS regime introduced within the next 1-2 years which we would need to adhere to (much like Western Waters Days but for all classes of vessel). This would need to be considered in addition to the assessment of the potential impact a reduced capacity fleet might have on King scallops within the MTS. This could also influence the application of a Tiered System. This should very much be a situation of 'wait and see'.

It is difficult to comprehend that this restricting access proposal is in the same consultation which seems so concerned about the economic viability of vessels in the fishery - the two do not belong on the same planet let alone in the same consultation.

QD.11 In principle, do you agree that a Tier-based Days-at-sea access framework for the Isle of Man scallop fishery could be an effective mechanism for regulating fleet capacity?



Comments:

It has some merit but I feel it would increase and decrease the value of the license depending on the tier. It would also be very harsh I think, some boats might be in a lower tier by a day or two and some in a higher tier by the same margin. The only way I see the tiered system working is if each qualifying vessel gets a fair portion of the total number of days based on the number of days that vessel has done in the reference period. I'm not sure how vessels could increase their share days after the initial split.

Again there should be an asterisk attached to this answer. An effort based regime such as a Tiered system has its merits and a DAS system may need to be introduced in the future (or be part of UK management changes). However, the opinion of the majority of MFPO members is that there should be a period of reflection and data collection and analysis after any reduction in fleet capacity before any further effort controls are brought in. If this consultation results in changes to the number of licenced vessels and the number is at the correct level then it should be possible to reduce some of the effort controls rather than increase them. However, if the number of vessels is still considered too high then effort controls may be brought in, in the future, but consideration would have to be given for any DAS regime that the UK introduces for all vessels.

It is difficult to comprehend that this restricting access proposal is in the same consultation which seems so concerned about the economic viability of vessels in the fishery - the two do not belong on the same planet let alone in the same consultation.

QD.12 If you do not agree with a Tier-based days-at-sea access framework, do you have any other suggestions on what might be an effective input control mechanism?

Each boat should have the same opportunity. Be it days or hours

Assess the impact of any reduction of the fleet on effort and landings before any further effort regime is brought in. Scallop fishing is very challenging across the UK and it is the general opinion of the UK fleet that there will be natural wastage over the next few years until we reach a level which is sustainable across the UK. The number of vessels that is arrived at, post-consultation, for the MTS may reduce further through the process of natural wastage. There are 13 scallop boats advertised for sale at this point in time, with very few buyers.

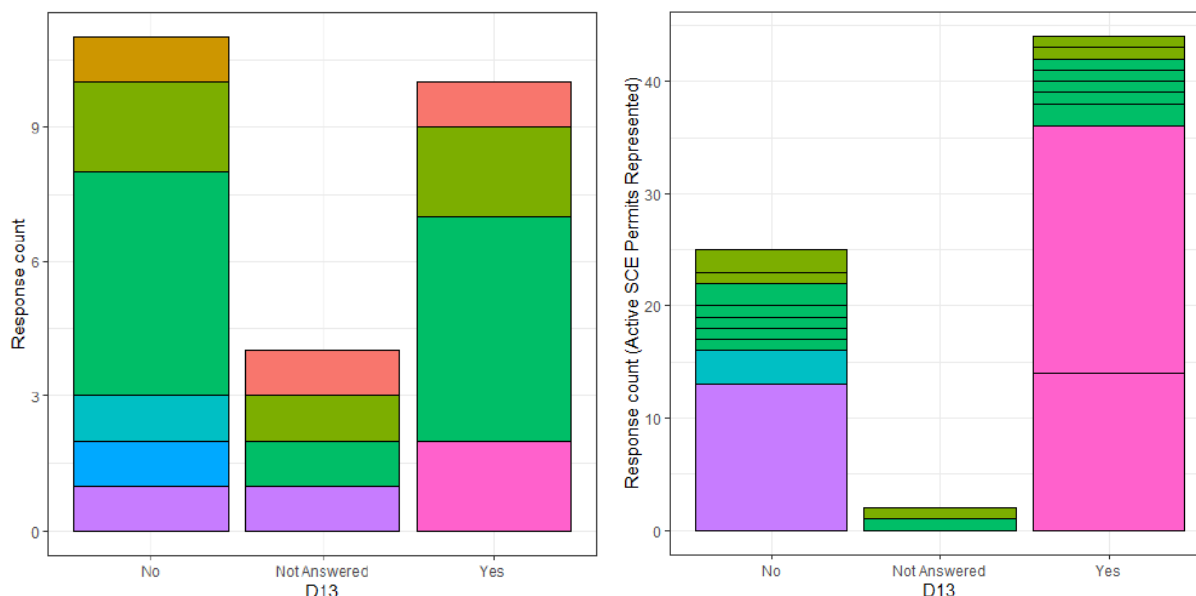
Therefore continue with the currently used methods of DCL and TAC, which reflects stock status, examine the number of boats post-consultation and their behaviour, factor in any DAS regime brought in UK wide and then assess whether any more input control mechanisms are needed.

Alternatives would be a pool based system within each jurisdiction allocated a certain number of DAS based on previous combined track records. Each jurisdiction then manages that effort pool.

I would go back to a daily curfew and retain the existing dredge limits, with possibly weekly quotas if quotas are needed (I agree with the need to avoid huge landings which can flood processors and crash prices) - the fishing will then regulate itself just as it did before these recent economic viability issues appeared.

Management based around sensible Curfews and dredge limits worked fine for many years in the Manx Scallop fishery. It was changed to include daily quotas, from then on the fishery and it appears vessel economic viability seem to have gone downhill at an alarming rate - is there perhaps a lesson to be learned there?

QD.13 In principle, do you support the development of a Tiered access framework that allocates and adjusts DAS for the Isle of Man king scallop fishery in line with Bioeconomic modelling and Long-term High Level Objectives?



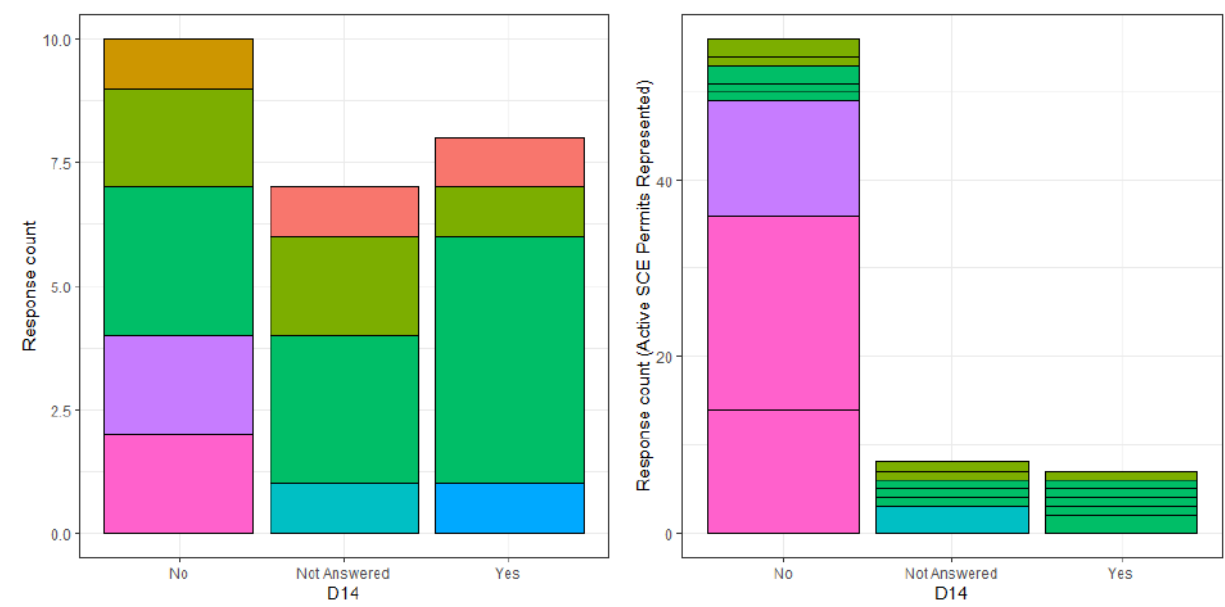
Comments:

From a selfish point of view I feel I'd be in the top tier so of course I'd want the tiered system. However I do feel it wouldn't necessarily be fair to everyone.

The MFPO supports the development of a Tiered Access framework but this should not be considered for implementation until the new number of vessels is assessed and other factors such as any future UK DAS regime is considered. So this is a qualified Yes. By all means develop the system but in the current form it would not be manageable as there are so many variations and difficulties within the system, some of which we may not see at present. At the same time 'model' other DAS or effort based regimes based on the new (and hopefully reduced) number of vessels.

It is difficult to comprehend that this restricting access proposal is in the same consultation which seems so concerned about the economic viability of vessels in the fishery - the two do not belong on the same planet let alone in the same consultation.

QD.14 If yes, do you think the Isle of Man Scallop Management Board and the Department should develop and implement a tier-based access framework, and replace the current binary access framework in the Isle of Man scallop fishery?



Comments:

SMB is the most informed to develop such a framework

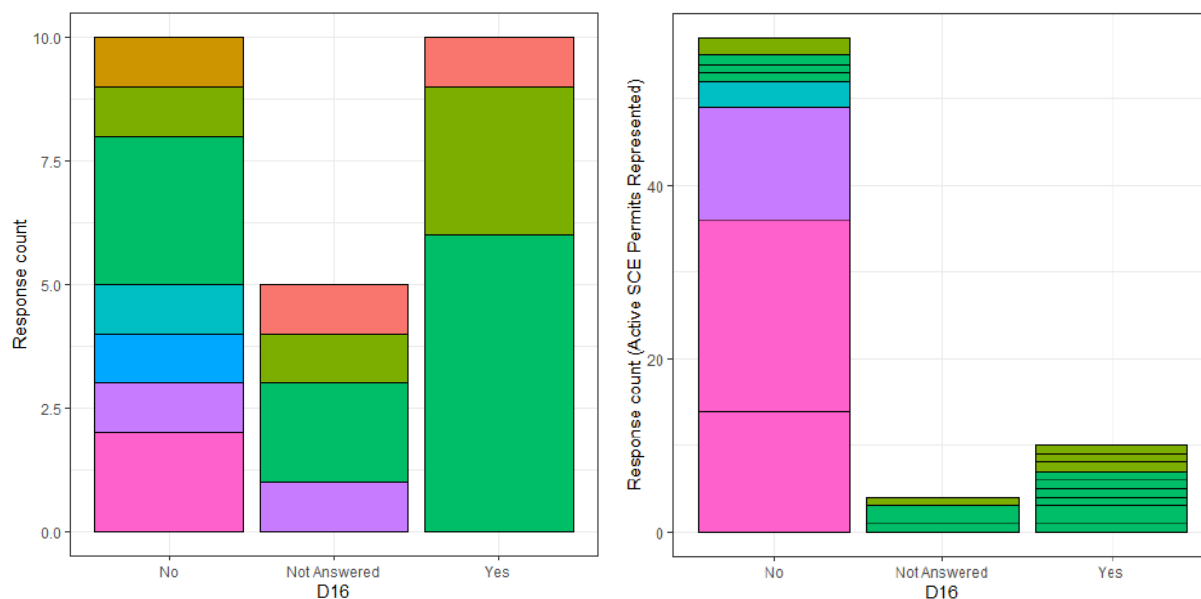
The SMB should develop the system, along with Bangor scientists and DEFA officials input, but not implement it until time has been given to assess the effect on effort and landings of a reduced fleet. Other factors such as UK wide DAS system may be introduced soon which would also impact on the modelling of a Tiered system. The Tiered System certainly has merit but it needs to be examined with real and/or live data from the reduced vessel fishery before being considered for introduction.

QD.15 It is acknowledged that a Tiered access framework may need to build in some flexibility for licences to move between Tiers. It is also acknowledged that the movement between Tiers may also provide opportunity for New Entrants at some point in the future. How might this be done?

Comments:

There should never be any new entrants allowed to this unsustainable industry, which has no long-term ecologically sustainable future.
This is an industry decision.
Future access for new/young entrants should always be factored into adaptive LTMPs, without 'news blood' the industry would die. How this is done is secondary in importance at this stage, building up stock and economic resilience should be the main focus for now- without which there will be no future for new entrants.
This is part of the modelling of the Tiered System. Various scenarios need to be inputted into the Tiered System and the workings challenged by real-time data. That data can only come from the fishery once any reduction in fleet numbers is factored in and tested in 'real-time.' Once we know the new number of vessels, have examined their behaviour both in the past and in real-time, and examined the impact of any new changes brought in by UK, can we effectively trial a Tiered System. Part of that trial will be incorporating new entrants although of course this would be unfair to bring in new entrants in the 3-12 mile licence category directly after a reduction in the fleet. One way of considering new entrants is within the proposed 0-3 mile management structure. With the large reduction in vessels that have a licence to fish in the 0-3 mile (due to natural wastage over the past 5 years) there could be room for a low number of new entrants within that fishery. It is likely that management of the 0-3 mile will be managed to limit overall effort, and with the alternative of fishing within the 3-12 mile it would be possible to add new entrants to the 0-3 mile fishery within that effort limit.
Perhaps focusing on the here and now issues that you have raised in the consultation might be prudent, it sounds as if there are more than enough issues to concern current stakeholders in the fishery.

QD.16 In principle, do you support the proposal to develop and implement a methodology that allocates DAS to individual Isle of Man Species Specific Licences for king scallops within a tiered regime, according to a track-record of participation (days-at-sea within the Manx scallop fishery) within the reference period; 01/11/2017-31/03/2020?



Comments:

Covid affected participation in the fishery after this period.

As pointed out in a previous answer, the tiered system can be developed but it must be tested in real-time scenarios to examine the credibility and effectiveness of such a system. There are so many variables that it could cause more problems than it solves, so it must be tested and modelled with real data from the fishery post-consultation before any such system is implemented.

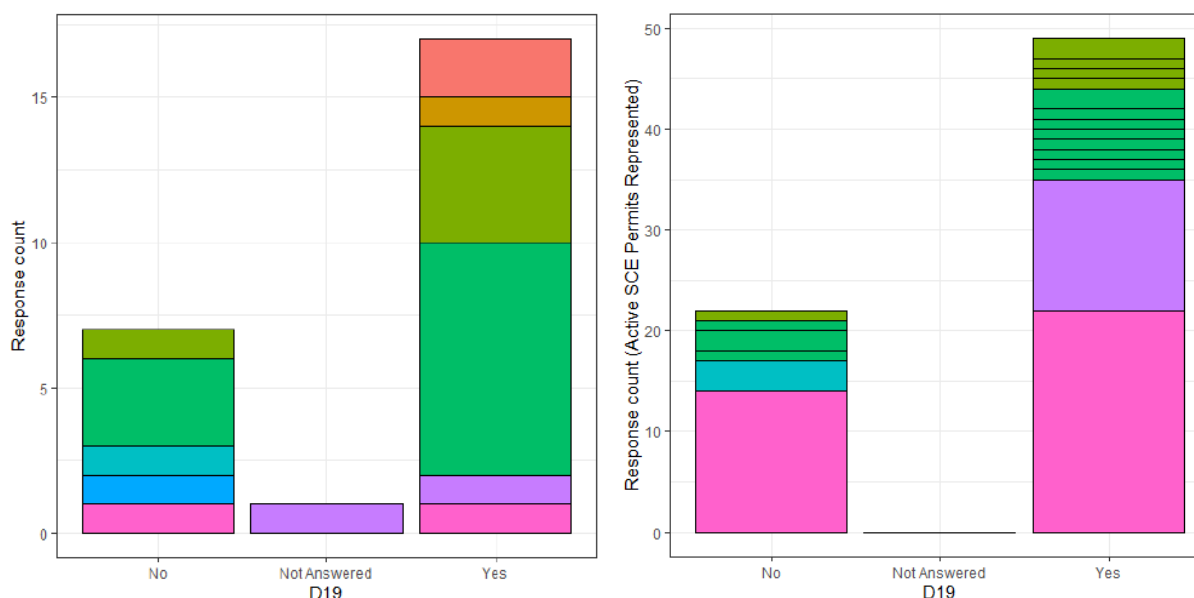
Also the track record period is fairly limited (due to Covid) and therefore may not be reflective of current behaviour. And yet it could be considered unfair to include the Covid period. There needs to be a period of post-consultation, post Covid fishing to assess the fishing behaviour of the newly reduced fleet.

It is difficult to comprehend that this restricting access proposal is in the same consultation which seems so concerned about the economic viability of vessels in the fishery - the two do not belong on the same planet let alone in the same consultation.

QD.17 If no, which fishing track-record metric should be used to determine access levels among eligible vessels, and which fishing years/seasons should be included as the reference period in track-record analysis?

Responses showed no clear consensus on an alternative track record methodology or metrics.

QD.19 Do you support the termination of Grandfather Rights for vessels over-221 kW in the Isle of Man king scallop fishery, allowing those eligible vessels currently operating under Grandfather rights to be replaced before a specific date?



Comments:

Enough time has passed since the introduction of grandfather rights for owners who genuinely want to continue with access to the fishery to replace or re-engine their vessels

Yes in principle- should be looked at 'case by case'

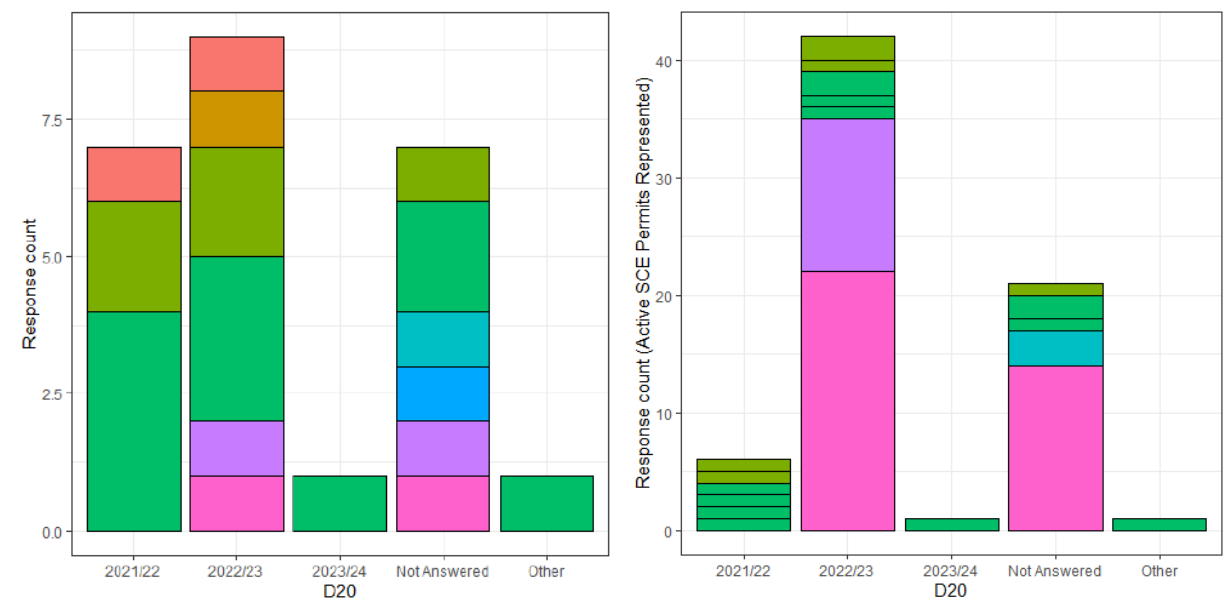
The view of the majority of the MFPO members is that this was never meant to be a long-term position, to allow Grandfather Rights to continue, without any end-date. This step was first brought in in 2010 when 22 vessels were included which had Grandfather Rights. Since then, we believe it has reduced to 6 vessels due to de-rating and natural wastage. The intention was, as an inshore fishery, to have all boats below 221kw - this is pertinent nowadays as the low DCL's mean a day's fishing for any vessel over 221 kw is very inefficient. There should be an end date and then a period in which the boats could be replaced by a vessel less than 221kw. There is the alternative point of view that the DCL has meant that vessels greater than 221kW have come to the fishery less and less and so removing them would have little overall impact. However, if we are to have an energy efficient fishery then they would need to be replaced at some point in the future so there should be an end-point.

History has shown with the constant natural decline of GF rights vessels in the fishery that the current GF system is both fair and works, no stakeholder loses access to their traditional and vital fishery unless they choose to do so for whatever reason. GF rights should die when such a vessel changes hands (as happens and as is working well) - if GF rights were time limited this should have been made very clear when they were granted, moving the goal posts without several years notice to give people ample time to prepare for such seismic change is at best questionable for several reasons.

It would be interesting to know the Nationality of the six GF rights vessels and if these vessels are spread equally among the Nations who make up the current IOM Scallop licence holders, meaning that any impact from their removal is non-discriminatory and would be shared equally among the Nations - a question that an impact assessment as required by the FMA 2012 would have answered.

Discrimination in any shape or form, be it direct discrimination or indirect discrimination must never be tolerated and should always be challenged. Unless the GF rights vessels are fairly evenly spread throughout the stakeholder Countries/IOM this should certainly ring alarm bells regarding discrimination, be that direct or indirect discrimination, one is no better or any more tolerable than the other. Given that GF rights vessels are under the very same catch limits and management measures as non GF rights vessels it is difficult to see this proposal as anything but an opportunistic means of removing some long term stakeholders from the fishery by default.

QD.20 If yes, from the start of which fishing season (01st November) should Grandfather Rights be terminated?



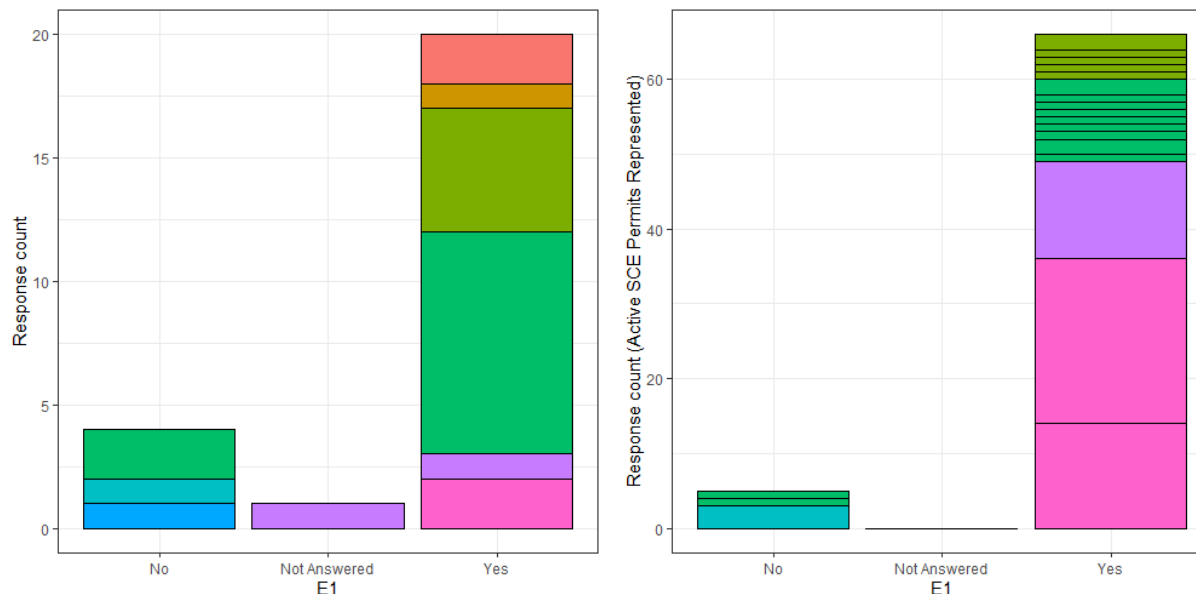
Comments:

If we are to remove Grandfather rights then these vessels should have the right to replace that vessel with one below 221kW and perhaps also have an extended period in which they can do this.

They shouldn't be but if they are then it would need to be at 2024/25 at the very earliest to allow those impacted time to consider their options and have an appropriate sub 300HP vessel sourced or ordered and built should they deem this to be their least worst option.

Section E – Technical Measures

QE.1 In principle, do you support the use of maximum tow bar length restrictions, for the purpose of limiting the number of dredges-a-side, within the Isle of Man territorial sea?



Comments:

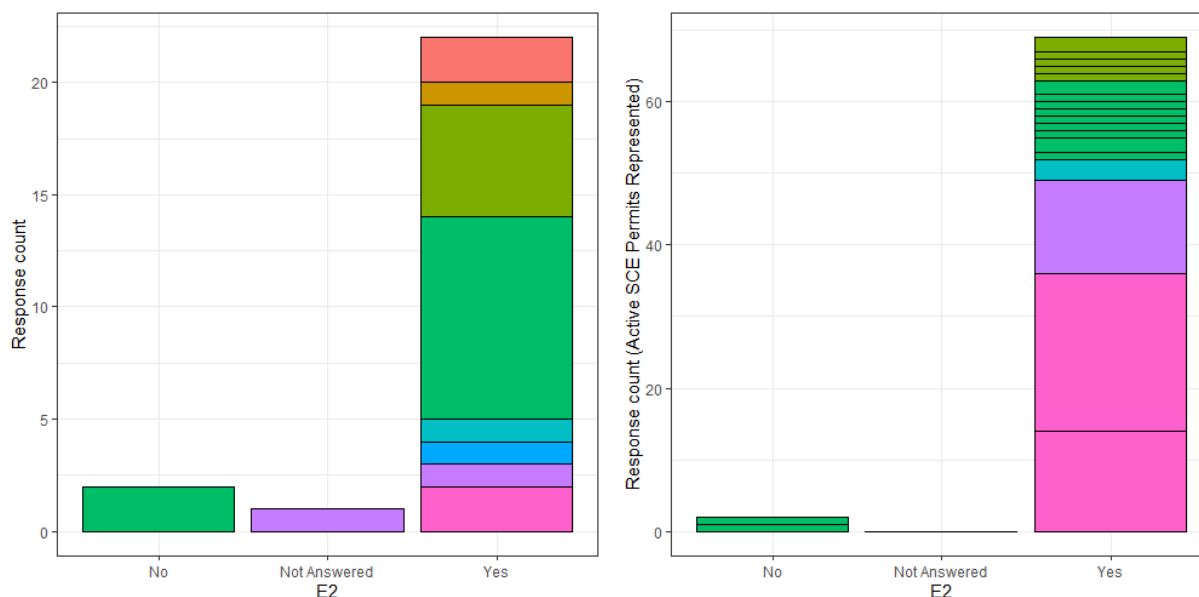
Max tow bar length reduces risk of vessels fishing with too much gear

The aim would be to match up with Northern Ireland regulations - aligning inshore fisheries regulations, where possible, has been promoted within recent UK scallop fishery discussions. The NI fishery from 0-12 mile is 6 a side and Manx boats cannot use their current 7 a side tow bar in those waters. Also there are more vessels from NI that qualify for the Manx fishery than any other devolved administration. It therefore seems sensible to align regulations.

Having a maximum length tow bar will also reduce the width and weight of gear being towed along the sea-bed in the MTS. This is important in reducing the environmental impact of the fishery. It will also assist enforcement as the DEFA team will be able to more easily check the number of dredges being used. Having a maximum tow bar length restricts the number of dredges it is possible to use and will ensure compliance with the rules.

We come back to handicapping vessels by making them ever more inefficient, this is a bit rich and totally at odds when a fundamental part of the consultation makes great play on lack of economic viability. The SMB is not representative of all stakeholders - were there many IOM members of the SMB who have interests in or represent vessels usually operating more than 6 aside tow bars in Manx waters - in attendance when this was recommended? This measure would increase fishing effort in Manx waters - totally at odds with what the consultation appears to be trying to achieve. It would also increase carbon emissions. Will any impact of this measure be shared equally among all of the Stakeholder Countries/IOM vessels (a question that a credible impact assessment as required by the FMA 2012 would have answered)? If not then this proposal is potentially discriminatory, be that direct or indirect discrimination.

QE.2 In principle, do you support the specification of the number of dredges on each tow bar (port and starboard), for the purpose of limiting the number of dredges-a-side, within the Isle of Man territorial sea?

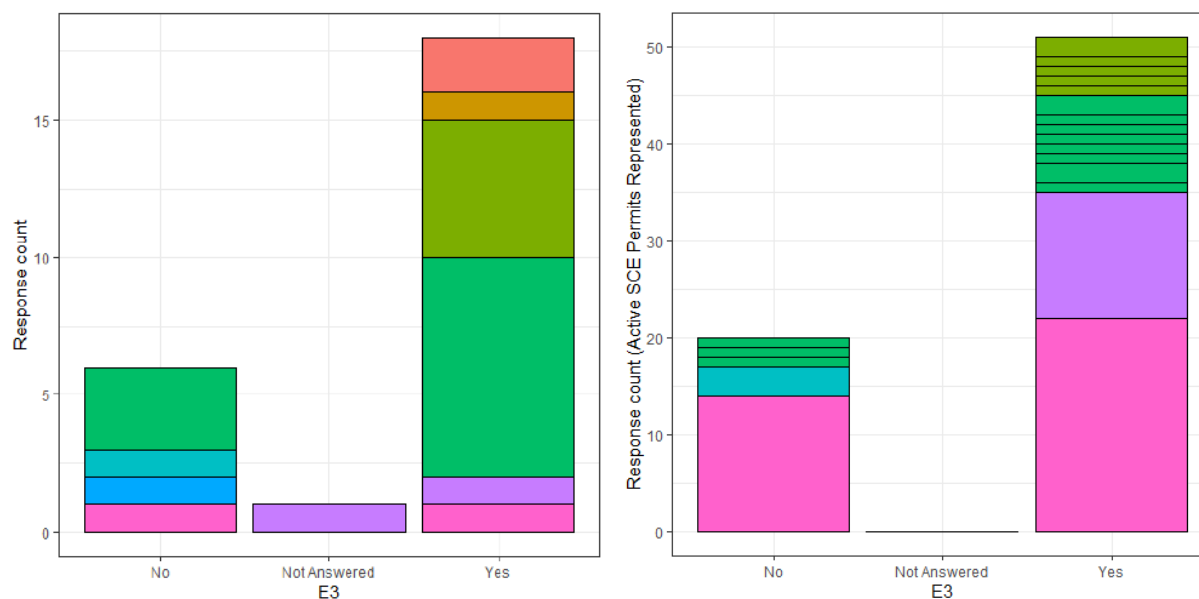


Comments:

To align with Northern Ireland regulations. This should reduce costs for the Manx and NI vessels which make up the majority of the licenced fleet within the MTS. This will also assist enforcement of the regulations. Of course there is the argument that by having 7 a side (the current maximum permitted), the boats that can tow such gear will be more energy efficient for a given catch than a vessel with 6 a side. Examining catch data does not necessarily confirm this position. A vessel with 7 a side has 16.6% more catching capacity than a vessel with 6 a side but from fishing data is only 5% more likely to meet the DCL. The 12 hour limit to fishing is therefore the main limiting factor to meeting the DCL rather than being 7 a side.

I'm not sure I really understand the point being made here!

QE.3 Do you support the introduction and/or amendment of measures that would prohibit a vessel from operating more than 6 standard scallop dredges-a-side in the extended Territorial Sea (3-12 NM zone), as recommended by the Scallop Management Board?



Comments:

If there is a bag limit and a curfew that should be enough without reducing bar length.

Have answered yes, however, if the quota system is enforced effectively then fishing with 7 dredges per side would make no difference - in fact it should result in a vessel catching its DCL quicker, so, spending less time fishing, reducing impact on the ground and reducing engine exhaust emissions.

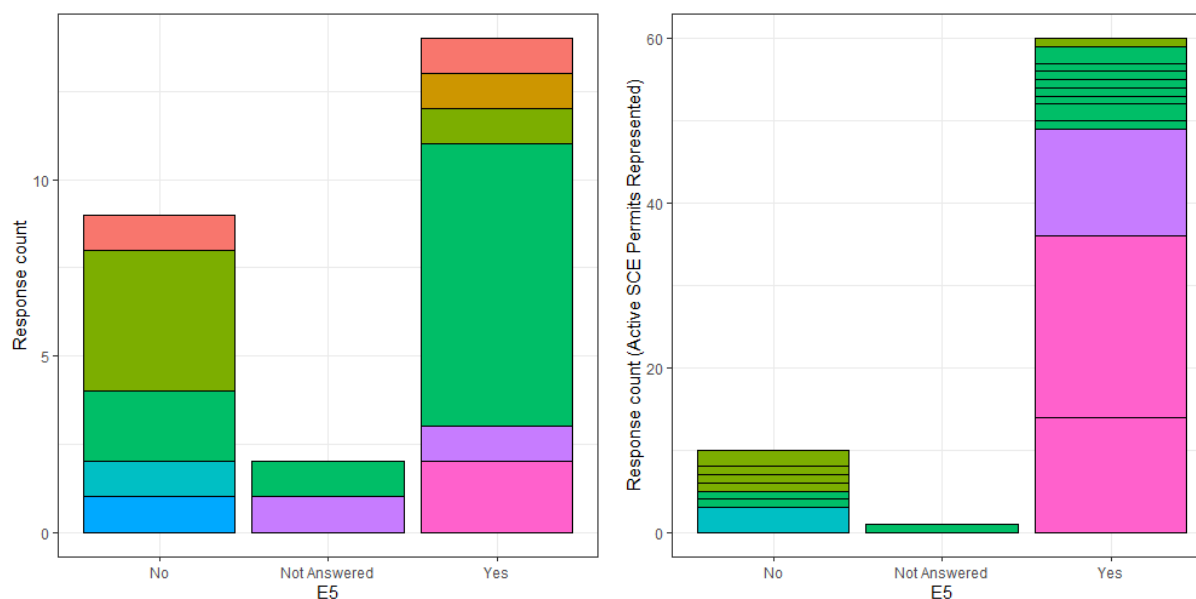
As stated in earlier answers, less weight of gear on the seabed will help to protect the environment. UK discussion have also recommended that inshore fisheries and geographically close fisheries should align regulations where possible.

We come back to handicapping vessels by making them ever more inefficient, this is a bit rich and totally at odds when a fundamental part of the consultation makes great play on lack of vessel economic viability. This measure would increase the fleet's environmental footprint in Manx waters and increase carbon emissions. The SMB is not representative of all stakeholders - were there many IOM members of the SMB who have interests in or represent vessels usually operating more than 6 aside tow bars in Manx waters - in attendance when this was recommended? Will any impact of this measure be shared equally among all of the Stakeholder Countries/IOM vessels (a question that a credible impact assessment as required by the FMA 2012 would have answered)? If not then this proposal is potentially discriminatory, be that direct or indirect discrimination.

QE.4 What is the maximum length of tow bar that should be specified to prohibit a vessel from using more than 6 standard scallop dredges-a-side?

Only two responses recommended a bar length that was not 5.5 m; one response suggested 8 m, and another suggested 4 m. There were 13 individual responses that suggested 5.5 m.

QE.5 In principle, do you support including provisions for vessels to carry fishing equipment onboard that are not permitted for use within the Territorial sea, subject to certain requirements?



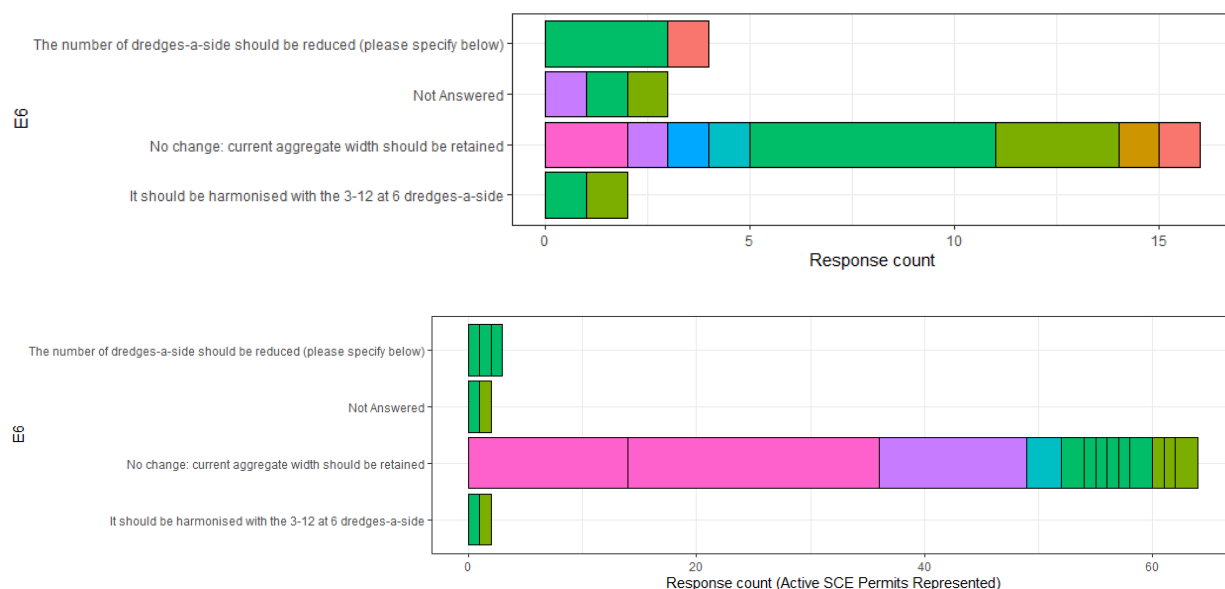
Comments:

It makes enforcement easier if vessels don't have the ability to tow more dredges than is legally allowed

This would allow boats that fish outside the MTS to swap their tow bars over and fish more dredges outside the 12 mile limit if they are capable. When fishing within the 12 mile limit the alternative tow bars must be securely lashed and not available for use. Ideally there should be cameras onboard to prove that the 'lashed' tow-bars are only used once beyond the Territorial Sea. Most of the larger boats, that are capable of towing longer tow-bars and can therefore fish with more dredges, will have cameras fitted as this is required in Scottish waters. Therefore any boats that wish to carry a longer tow bar should have their cameras operational in Manx waters so that this can be easily checked by enforcement.

This gets dangerous, swapping tow bars at sea in anything but breath calm conditions is a disaster looking for somewhere to happen - how sad if an IOM tow bar length restriction directly led to serious injuries or worse, more so at a time when safety aboard fishing vessels is under more focus than ever.

QE.6 What are your views on the number of standard scallop dredges that may be used by vessels fishing in the Isle of Man 0-3 NM zone?



Comments:

The fishery is at present wholly unsustainable.

Along with other measures it is a way of reducing effort per boat. If the SMB feel the need to reduce the number of dredges-a-side we would support that. We would not support an increase.

It harmonizes the territorial sea at 6 dredges aside and brings it in line with Northern Ireland.

The first thoughts of the majority of the MFPO members were to have 6 a side in the 0-3 mile as well as 3-12 mile. This would match the Northern Ireland regulations. However, on reflection it was felt important to have that distinction between the 2 fishing zones. Less than 50% of the current fleet has access to the 0-3 mile and having the limit of 5 a side in the 0-3 mile sets up a demarcation point. It also means that 6 a side boats, even if qualified, are more likely to stay outside the 3 mile limit if they have to remove one dredge a side. It is therefore easier to state where the catch comes from on their Nestforms and for catch analysis to compare data between the two areas.

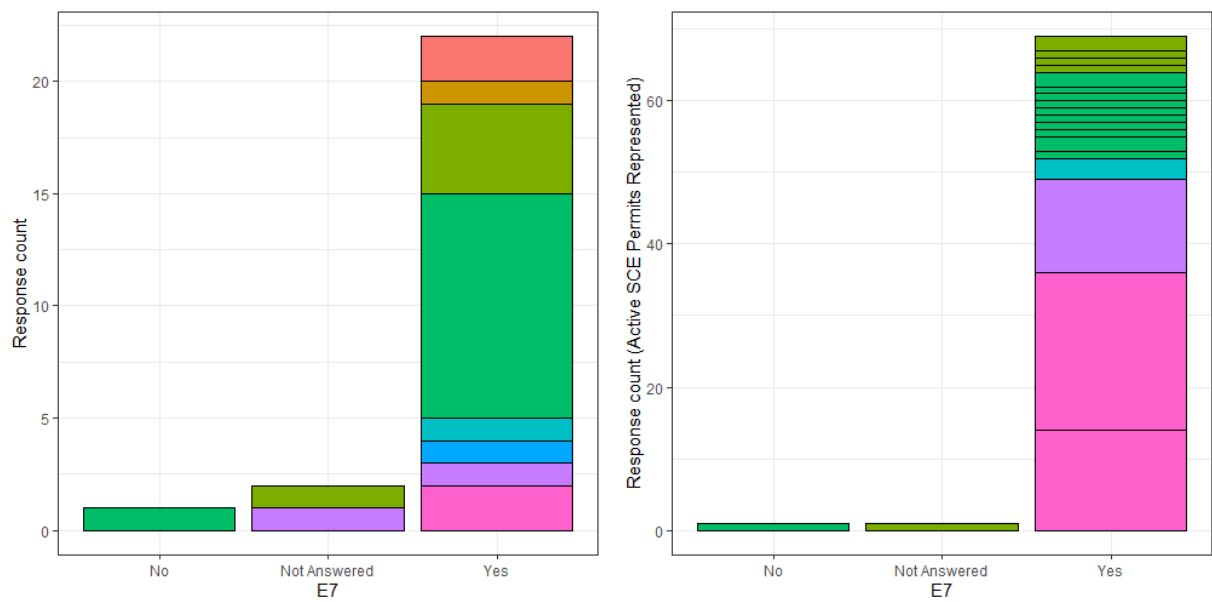
Also there could be a tendency for a 6 a side qualified boat to fish within the 0-3 mile, if 6 aside were permitted, rather than go outside the 3 mile where the higher number of dredges is allowed. Finally, perhaps this decision should be left until the proposed 0-3 mile management regime is formed, and a Fisheries Management Plan developed, before changing current rules.

Please note there should be a maximum tow bar length specified for the 0-3 mile. This should match the proposal for the 3-12 mile (e.g. 5.5m)

It beggars belief that as you seem to be trying to reduce fishing effort there is an option above to actually increase the amount of dredges per side within 3 miles - this is all very strange indeed, although given the current make-up of the SMB it comes as no real surprise.

If there are to be gear reductions then they must be across the board, inside 3 miles must be reduced in proportion to any dredge reductions between 3 & 12miles.

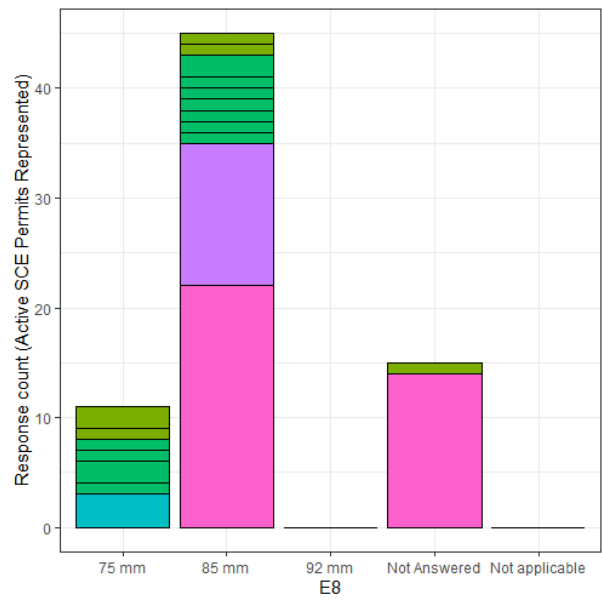
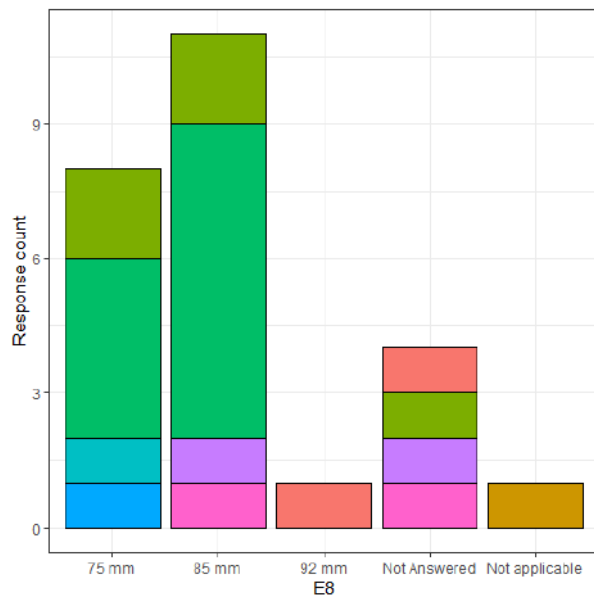
QE.7 In principle, do you support the continued use of a minimum internal diameter specification of scallop dredge belly-rings within the Isle of Man territorial sea?



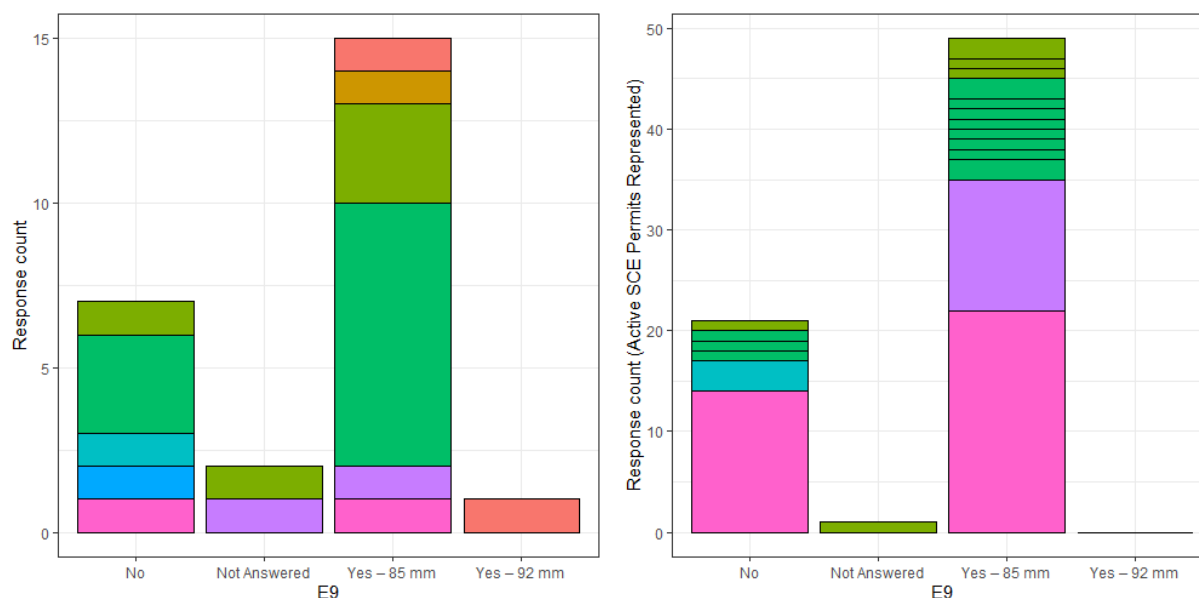
Comments:

Not Answered
It helps sort the catch on the seabed and reduces stress to juvenile scallops
There needs to be more investigation to find most suitable ring diameter belly/half back and netting covers
Having a minimum internal diameter reduces the potential bycatch of a number of species
I see no reason not to but the real driver in catching less small scallops is using 8 tooth rather than 9 tooth swords. I have never noticed much difference when trialling different belly rings but the difference between 8 and 9 tooth swords really is night and day.

QE.8 What is the internal diameter of bell-rings that you typically use to fish for scallops in the Isle of Man territorial sea?



QE.9 Based on the information available at this time, would you support an increase in the minimum internal diameter specified for scallop dredge belly-rings within the Isle of Man territorial sea?



Comments:

It appears this is the recommended size.

85mm rings don't catch any less adult scallops than 75mm but catch considerably less juveniles when new or worn however the bigger the rings the bigger the scallops that can be shaken out as the rings wear. So although I haven't used bigger than 85mm I feel any bigger and they'd become inefficient as they wear.

This will assist grading on the sea bed by removing a larger number of juvenile King scallops. It will also reduce the weight of the gear (compared to a dredge with a 75mm belly ring) and reduce bycatch.

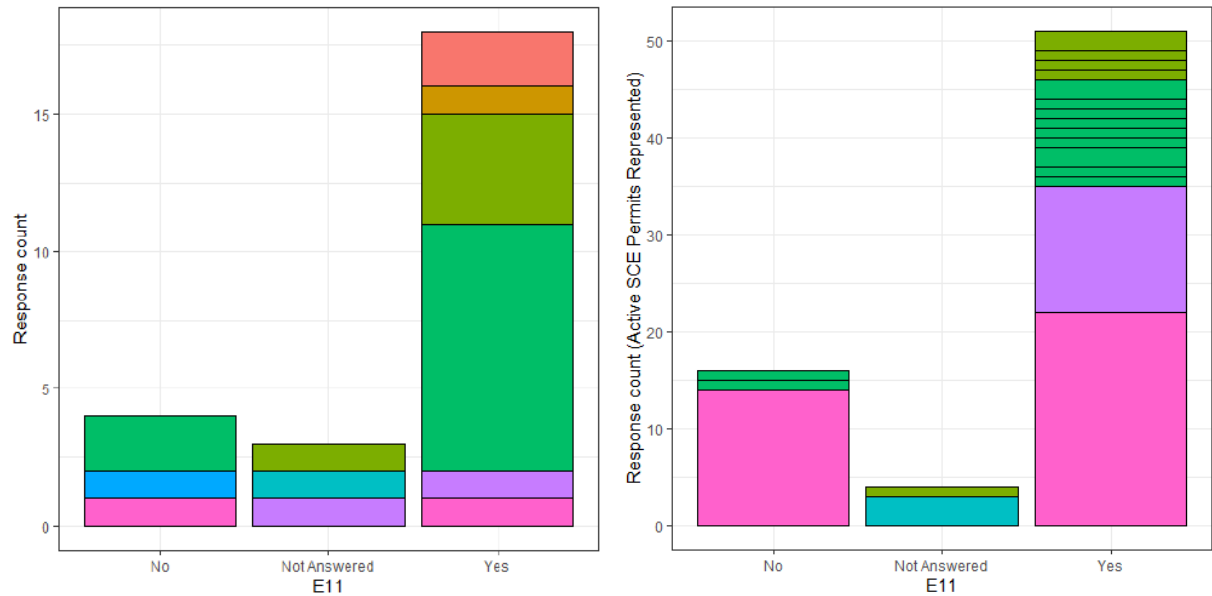
Scallop gear is expensive, any change would need to be phased in over a sensible period of time so that good gear did not have to be replaced rather than worn out over time - nobody needs more pointless expense at a time where it seems that economic viability is a big player in (some of) this consultation.

QE.10 How many teeth are on each tooth-bar that you typically fish on king scallop dredges within the Isle of Man territorial sea?

Comments:

Three responses showed that three stakeholder's fish using 9 teeth, however all other responses showed fishers already using 8 teeth on dredge bars.

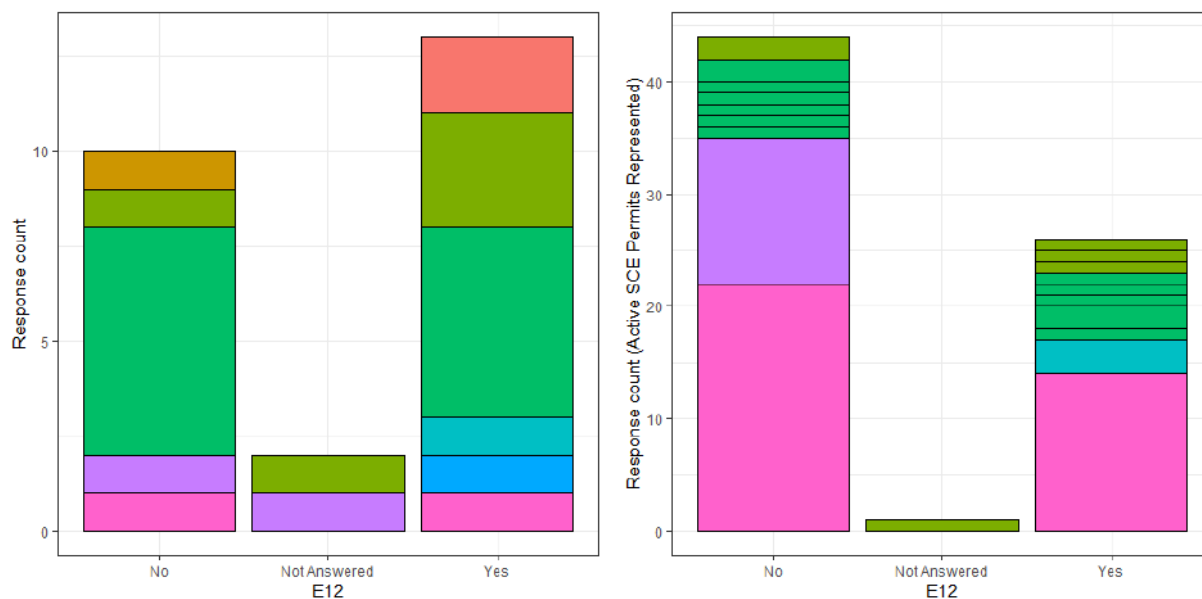
QE.11 Based upon the information available at this time, do you support a reduction in the number of teeth per dredge to 8?



Comments:

It appears to be the recommended tooth number.
Less juveniles caught unnecessarily
It reduces discards
This is already common practice
This measure would be very welcome, it is the original win-win for so many reasons, they select scallops better, less work for crews, cheaper than 9 tooth swords etc. I don't know of a single negative that would arise from implementing this measure.

QE.12 In principle, do you think there should be a standard dredge technical specification for the northern Irish Sea region?



Comments:

Easier for enforcement and the industry.

This does not allow for any technical development of the dredge. Regulations are already very strict on the type of dredge that can be used. Trials should be permitted on technical changes to dredges to reduce sea-bed contact time.

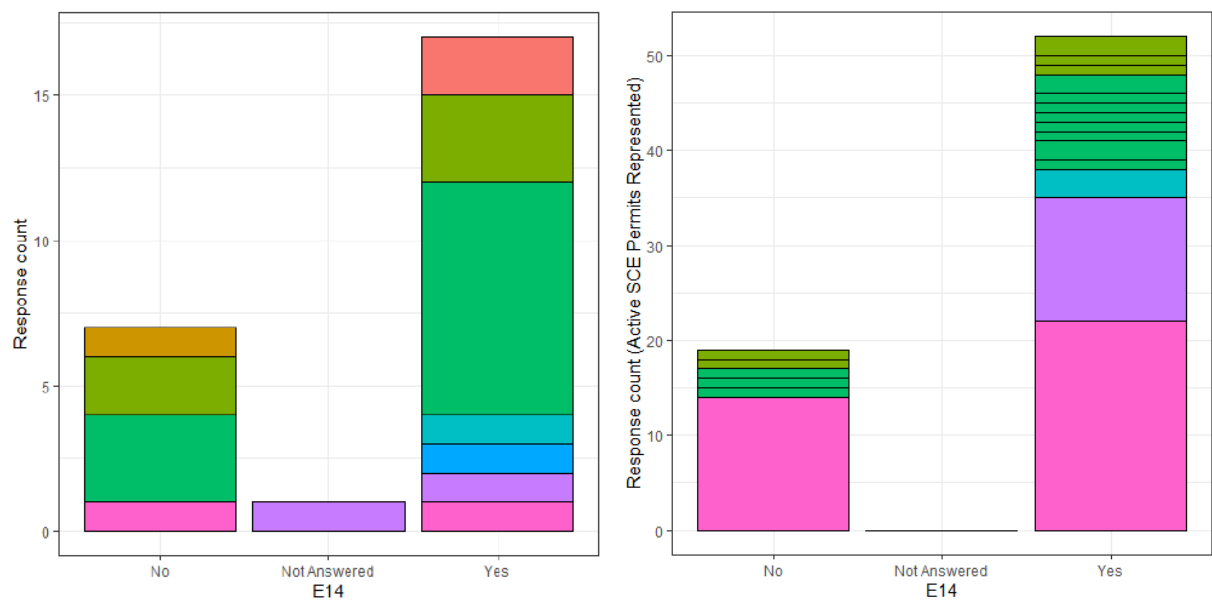
Harmonisation of individual dredge technical measures has to be a good thing.

QE.13 Do you have any views on any other Technical Measures relating to scallop dredge fishing in the Isle of Man territorial sea?

Comments:

Minimum landing size should be increased.
We should continue to explore and test the design of less destructive gear.
If we get the stock levels up and the fishery becomes profitable, increasing the mls could be a option to increase profits from landing a better/bigger product
A study should be commissioned belly ring and half back diameter ring size and mesh size should be commissioned pan Irish Sea.
Also benefits of increasing MLS of scallops should be investigated i.e leaving an older year class on the ground to spawn - again pan Irish Sea
Technical trials should be permitted which reduce the contact with the sea-bed e.g. trails to lift the belly of the dredge off the ground. This would reduce the weight of gear on the sea-bed and allow for more active grading of the catch on the sea-bed.
The only real positive step that I can see is making 8 tooth swords mandatory, I have never seen mesh size, ring size etc making any real difference to selectivity anywhere ever but 8 tooth rather than 9 tooth swords is consistently night and day.

QE.14 In principle, do you support the use of REM (Remote Electronic Monitoring with onboard cameras) in the Isle of Man Scallop Fishery for all vessels?



Comments:

100% yes.
To assist enforcement.
It makes enforcement easier.
Already vms tracking, nest forms, e logs and fishery protection vessel.
Very effective management and enforcement tool that should be mandatory for all UK waters
This assists with enforcement and protects the fishery. It will also help to ensure that vessels do not tow through restricted areas or no-take zones.
It is a foolproof way of checking vessels activities, easy policing and among other benefits it should be effective in helping combat some of the negativity and wild accusations constantly thrown at the scallop sector by eNGOs.

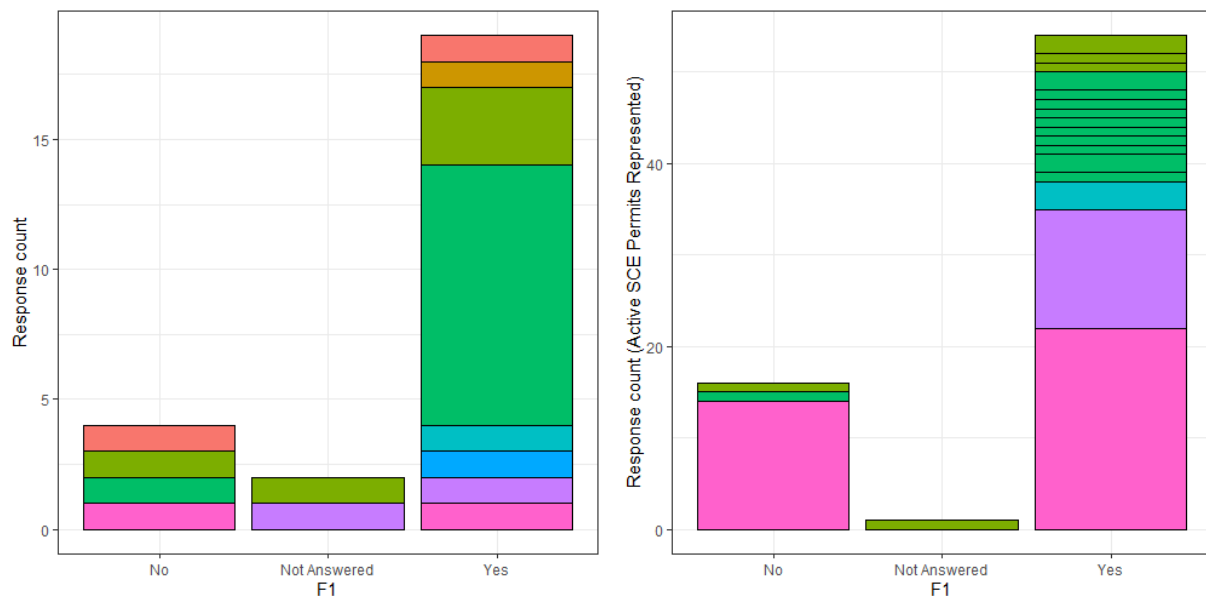
QE.15 How do you think such equipment should be funded?

Comments:

Solely by the industry.
By Government
Government
Government funded or at least grant aided to manx vessels
Defa
Partly government funded
As per usual with such equipment, grant funded for a voluntary period by Devolved Administrations
Ideally this should be centrally funded through government. Marine Scotland who are the first to bring in REM for all scallop vessels and also paid for all of their scallop boats to be fitted with REM. It would be a huge disadvantage if members of the MFPO had to pay for the REM particularly given the current financial and economic hardships they are faced with. At present, if Manx boats wish to fish in Scottish waters (which reach down to approximately 8 miles north of the Point of Ayre) from January 1st 2022 then they will need to have REM fitted. This would be at their own cost which gives the Scottish fleet an economic advantage.
Some vessels already have it fitted, perhaps having REM fitted could be a caveat of retaining access to the fishery if as it seems you wish to drastically reduce fishing effort - I am unsure how it should be funded, possibly by fisheries administrations as has been the case in Scotland.

Section F – Additional Considerations relating to the LTMP

QF.1 Do you agree that the recent management of the Isle of Man scallop fishery has benefited from additional industry-led surveys, which have had design and analysis support from Bangor University?



Comments:

Biased.

Because of COVID-19 restrictions in spring 2020 bangor were unable to do a survey, therefore without the industry survey there would of been no information to help set the limits of the 2020/21 fishery

Surveys should be carried out by fishing boats.

The industry led high resolution survey is now an invaluable tool in fisheries management within the Territorial Sea. It samples both juvenile and adult King and Queen scallops and so provides a complete picture of the distribution of the two stock and their size distribution. It allows for accurate closure of grounds and therefore protects juvenile beds of scallops. It is essential to continue these surveys.

At present this has been funded by the MFPO on behalf of the whole fleet. Therefore all UK licenced vessels have benefitted from the surveys but paid nothing towards the costs.

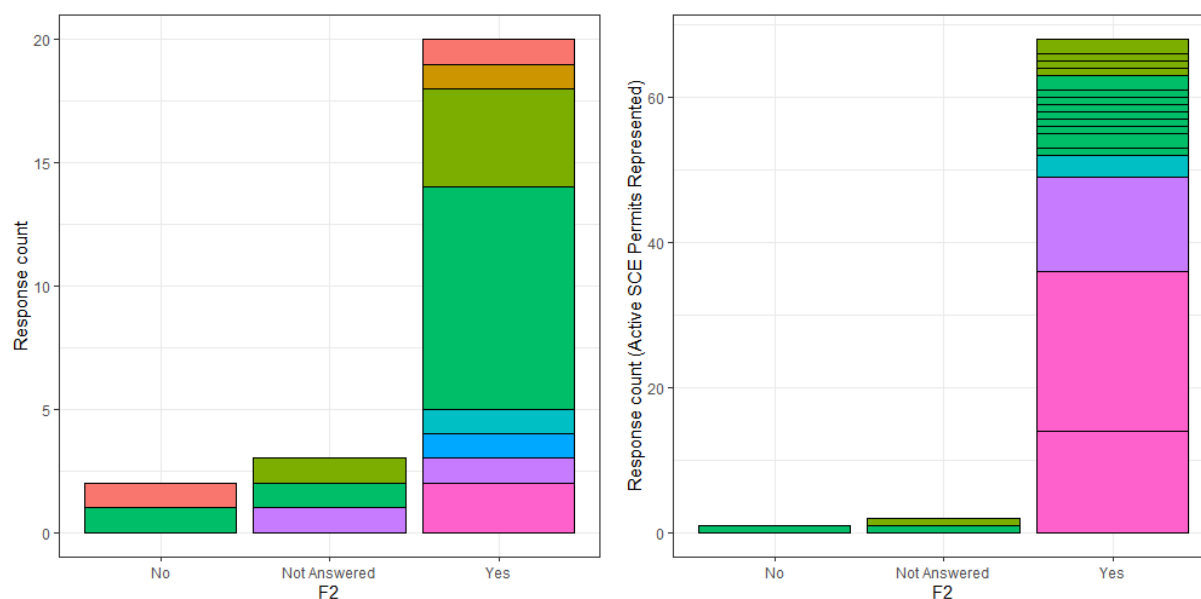
DEFA have assisted with grants where possible but the MFPO have funded a minimum of 60% of the costs each year.

Yes - but the problems seem to have escalated in proportion to Bangors involvement although this may be more due to the timing of natural cycles than anything to do with Bangor.

There has clearly been some Manx industry concern regarding some of these surveys.

In practical terms I am unsure what positives they have brought apart from more data, pre-Bangor there was a world class highly profitable multi-stakeholder fishery enjoyed by a much larger fleet than today - going by this consultation this once mighty fishery has been driven to almost basket case status even though the fleet has been drastically reduced.

QF.2 Do you agree that funding future industry-led surveys will be important for the development, evaluation and delivery of the Isle of Man scallop LTMP?



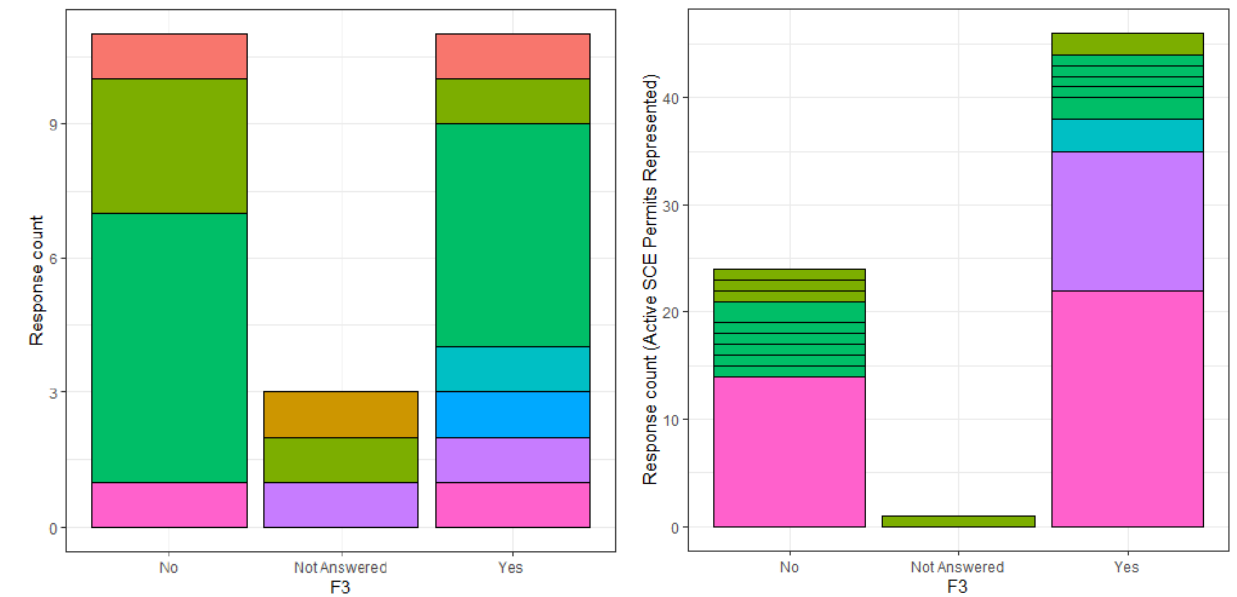
Comments:

It surveys more sites therefore gives a more accurate picture of the stock

Industry-led surveys will be vital for all aspects of the LTMP. The information from the survey helps with targeted and very efficient fishing. It also defines stock boundaries and juvenile and adult beds of scallops thus allowing for accurate and appropriate closures of areas of fishing grounds. This ensures that juveniles are protected and allowed to grow into the adult population. The surveys also enable year on year changes to be accurately assessed.

I have no idea.

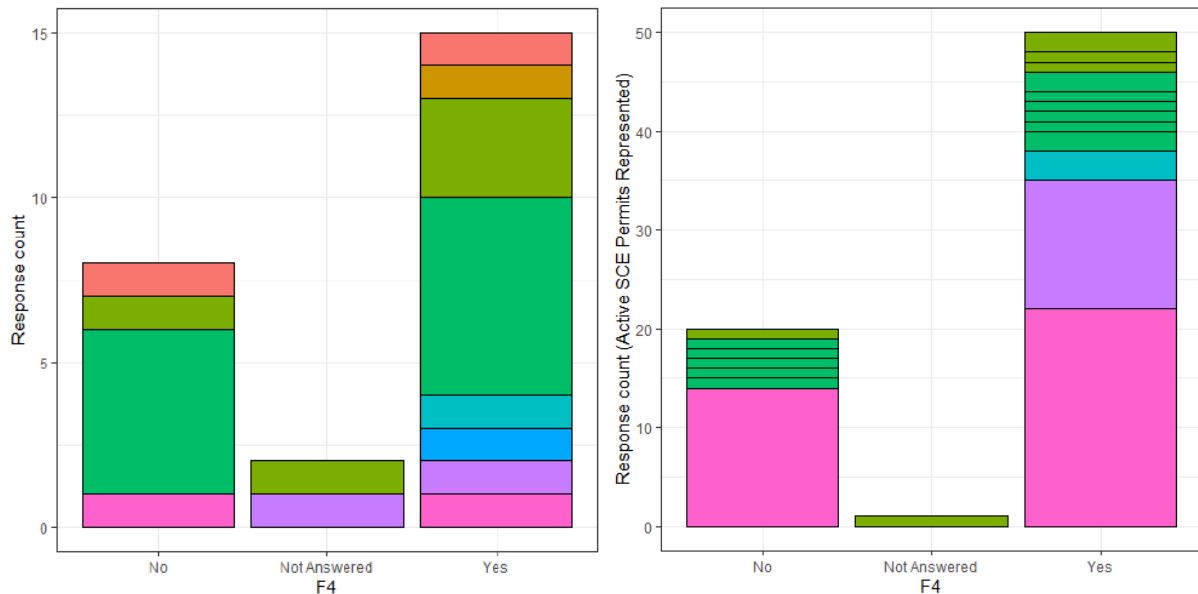
QF.3 Do you agree that revenue should be raised from the fishery in order to fund industry-led research proposals?



Comments:

Biased.
I think it should be government funded but as it's unlikely we have to find another way
How? The fishery is barely viable as it is without charging vessels extra for research
It is unfair for the industry surveys to be organised and funded by the MFPO alone. There needs to be some mechanism of user pays and or a combination of this and government support.
Manx PO members alone benefit from the lucrative Ramsey Bay fishery, could the required funding be raised as a part of this exclusive and highly profitable fishery?

QF.4 Do you agree that revenue should be raised on a user-pays principle?



Comments:

It should be a combination of Industry and Government funding. Government pays more because they are independent.

Should be a pay as you use scheme

Anybody with a permit to fish in the TS should pay an equal amount

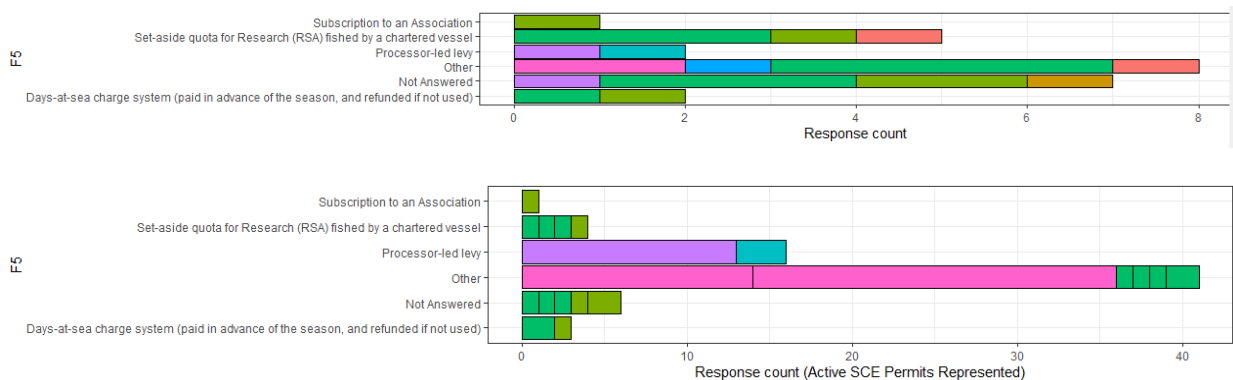
Those that benefit most from the fishery should pay contributions towards the funding of the industry surveys. If there was also support from government then the surveys could be expanded further.

How do you measure who benefits most from the fishery?

It could be said that we have a 3 tier stakeholder set up - those with access inside 3 miles and also out to 12, those with access between 3 and 12 only, and those with access inside 3 miles and out to 12 + the Ramsey Bay Fishery - should the latter who have the most access and benefit the most pay the most, it would be difficult to argue a credible case otherwise.

Much of the focus of the consultation seems to be on economic viability concerns and challenges, this would obviously add to them.

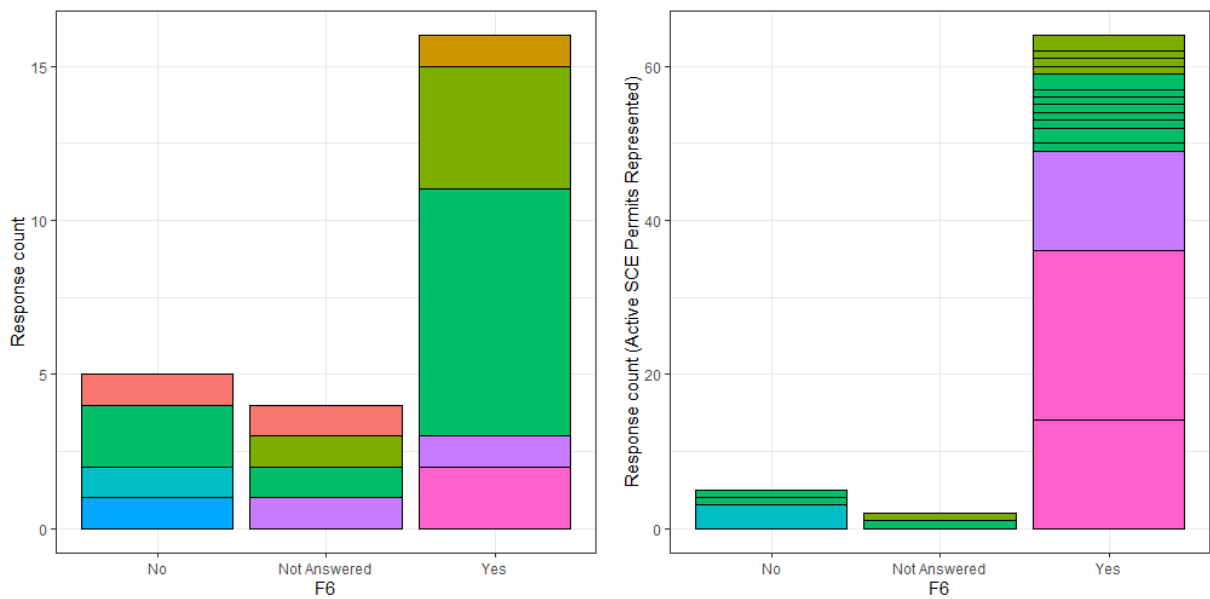
QF.5 Do you have any proposals on how this revenue should be raised?



Comments:

Those who benefit the most contribute the most. Also amount should reflect the size of the boat.
Could be based on all of the above
Permit trusted boats to fish above the Daily Catch Limit with the funds going to a research fund that is used for surveys and other scientific purposes. For example, the current DCL is 700kg. The trusted vessels would be permitted to land up to 770kg with any landings above 700kg going to the scientific fund. The named boats would therefore be able to catch their maximum level of 700kg and not have to throw back any landed catch from their last tow of the day. At present vessels often need to return part of the catch of the last tow to ensure they do not exceed 700kg. Allowing an excess up to 770kg would mean the catch does not have to be returned to the sea (we do not know mortality rate from this) but could be retained and landed. The value of the excess catch would be paid directly into the scientific fund by a trusted processor. Once the system has been trialled and is working, then this could be expanded to all boats and all processors. This would ensure that user pays. Set aside quota is similar but would mean boats are paid to land the catch with the result that far more quota needs to be set aside to achieve the same level of funding.

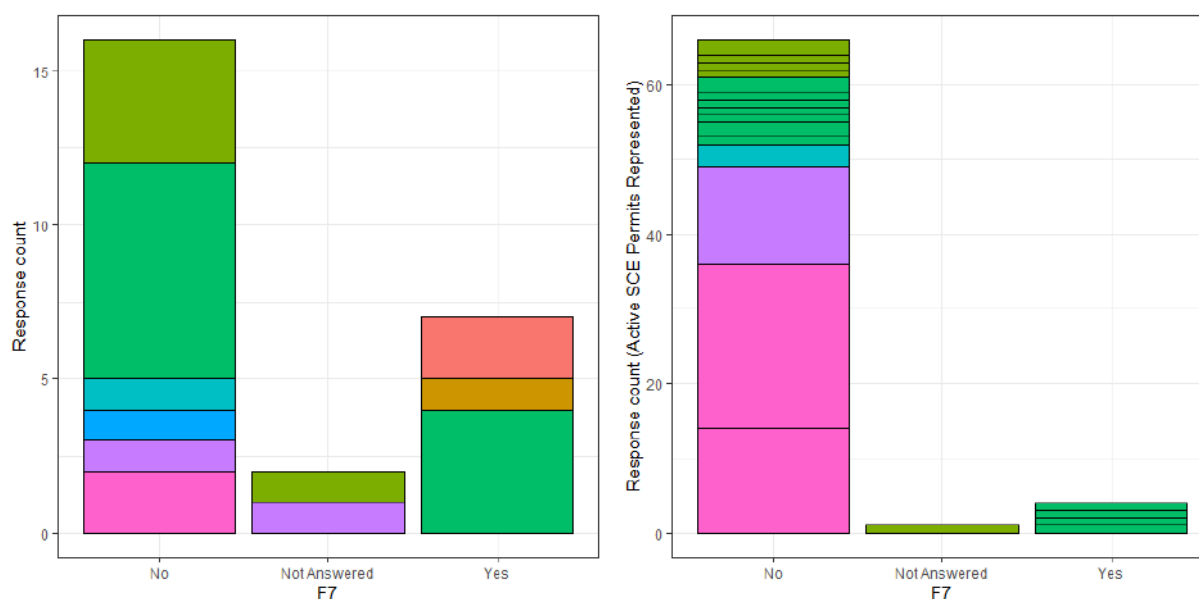
QF.6 Do you support the establishment of an Isle of Man Fishing Industry Research Council (FIRC) to take responsibility for the administration and delivery of a funding scheme?



Comments:

We would support the provision of a body that is independent from political pressures but must not increase the financial burden to the Industry.
There needs to be a regulated funding scheme to ensure the funds are applied correctly
Yes but with the caveat that it is truly representative and reflective of all stakeholders unlike the current SMB which is anything but representative and reflective of all stakeholders.

QF.7 Do you agree that a dive-caught scallop fishery within Isle of Man territorial sea should be developed?



Comments:

Because mobile gear bottom trawling is amongst the most ecologically unsustainable fishing practices on the planet.

In conjunction with the above Objectives i.e. managed appropriately to avoid undue pressure to the marine nature reserves and the marine environment in general.

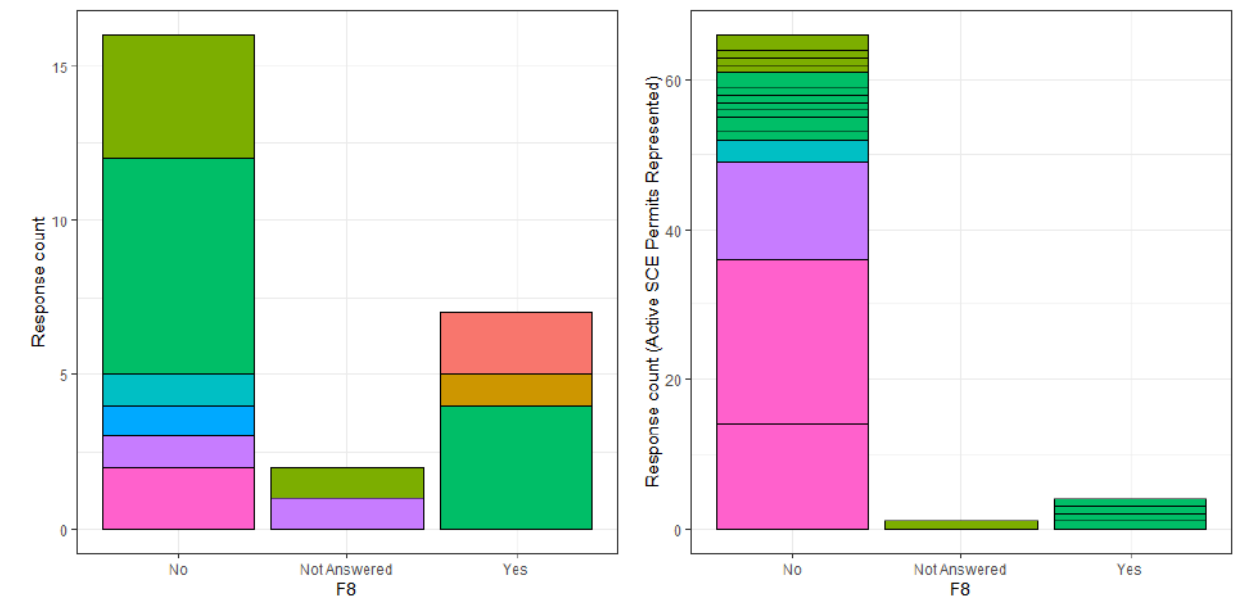
There's never been a dive fishery in the past and the only reason it's being discussed now is because the dredge fleet have sacrificed so much ground to marine nature reserves and conservation zones which I believe are the areas being discussed for the dive fishery

Must be inclusive

Not at present. The stocks are in recovery phase and we are trying to reduce effort. Also the industry gave up large areas of the 0-3 mile (over 50% is currently protected) to protect key environmental areas. There were also areas which did not have specific features to protect but will have developed scallop brood-stock populations which will provide spat for the fished areas. The areas that would be targeted by divers would be in the areas where mobile gear is not used. This would therefore impact on the sacrifices the industry have recently made.

There are many issues with scallop diving, these would need to be addressed before any such fishery was given access. The addition of a dive fishery would place more pressure on the stock.

QF.8 In principle, do you agree that the Department and the Scallop Management Board should work to develop and integrate a dive-caught scallop fishery as a component of the king scallop LTMP?



Comments:

Because mobile gear bottom trawling is amongst the most ecologically unsustainable fishing practices on the planet.
Its potentially a lower impact fishery with a higher economic value.
The aim of the LTMP plan is to improve stocks, partly through a reduction in effort. This is not the time to discuss increased effort.
An added dive fishery would place more pressure on the stock which going by this consultation is already under more than enough pressure.

QF.9 If yes, what do you consider to be important in establishing and managing a dive-caught fishery?

There should be 1) a marine ecologist, 2) a marine biologist and 3) a professional diver-member on the Isle of Man Scallop Management Board.
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Yes to a diver on the SMB.

Licence costs should not be based on boat engine size as it is with dredge caught scallops.

Preference for existing fishing vessels (scallops or otherwise) to change to diver caught scallops.

There needs to be scientific input to assess the impacts on fecundity and spat supply, it is likely the fishery would target older and dense scallop areas.

Separate regulations for diver caught scallops, may be needed.
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Dive caught aspect should be considered as 'new entrants'

QF.10 In your view, how would the development of a dive-caught fishery interact with the established scallop fishery, and the Scallop Management Board?

At present the mobile sector would be very much against any dive caught product for the reasons explained above. There may come a time to discuss this again, once the stocks have recovered, but, at present, when effort is being reduced we should not be considering any increase in effort.

It would be another stakeholder group in the fishery, I don't see how or why it would interact any differently from any other group, they would have to abide by closed areas etc.

As a stakeholder their views would need to be reflected on the SMB, currently this is not the case with some existing stakeholders.

QF.11 It is anticipated that any new fishery for king scallops (incl. dive caught) would be subject to similar regulation and management approaches to existing scallop fisheries. Do you have any specific ideas relating to the management and licensing of a dive-caught fishery in the Isle of Man territorial sea?

Comments:

There should be greater subsidy / support for dive caught businesses.
Any new scallop fishery should only be allowed to happen in the same fishing areas as the current scallop fishery
Do not permit the development of a dive caught fishery at this point in time. Assess the level of effort and number of vessels post-consultation. Give the time for the changes to have an impact on stocks and then revisit this question.
They must adhere to all legislation both in diving and processing - there are far too many cowboy operators in the UK Scallop dive sector who neither conform to H&S diving regulations or market their catch through legitimate channels - the disaster potential to the scallop sector from both is frightening.

QF.12 Do you have any other comments or suggestions relating to Long-term Management Plan and immediate management options for the Isle of Man king scallop fishery?

Comments:

<p>This fishery is a disgrace, being wholly ecologically unsustainable and should be closed. One of the most ecologically destructive fishing techniques known to the planet should not receive any Government support.</p>
<p>That permanent exclusions zones in the 3-12nm should be considered and the selection should be based on scientific evidence for spat supply and other conservation requirements. Under Objective 6 goals should be set to reduce distance travelled by boats e.g. reductions in travelling to land catch. Minimise swept areas and ecosystem damage in management of the fishery. A new consultation will be required for the details/aims for the LTMP, especially Objective 3. Lessons learned from Ramsey Bay MNR should be taken into account.</p>
<p>Manx registered vessels should be looked after first. Visiting vessels should be charged fees to land here, take water, Moor in a marina etc.</p>
<p>Well done Isle of Man for once more leading the way in terms of scallop management. If there is to be any hope for a future for the the UK scallop industry, the wider Industry and Devolved Administrations must follow the Isle of Man's lead.</p>
<p>If there are too many objections to the reduction in fleet capacity and too much political pressure to permit sufficient changes in the fleet structure and the number of qualified vessels, then consider an alternative approach with the 0-3 management regime being extended out to the 6 mile. Vessel numbers could be cut within the 0-6 mile zone, based on a strict track record requirement, with the fleet structure of the 6-12 mile based on a less strict track record. This could mean more vessels still retain access but that the close inshore waters are well protected. This would be similar to other UK administrations where the 0-6 mile and the 6-12 mile have different rules and access arrangements.</p>
<p>Parts of this consultation appear to be alarmingly discriminatory. Several proposals seem to be targeted at specific stakeholders in the fishery, tellingly there is nobody reflecting these stakeholders interests on the SMB despite this anomaly being raised on many occasions. Discrimination, be that direct or indirect discrimination is a dreadful thing and should never be tolerated whenever or wherever it rears its ugly head, the Isle of Man is I hope much better than this. Given that the SMB has become a powerful body which plays a fundamental part in influencing management of the fishery and its future it is hugely important that the SMB is truly reflective of all stakeholders, currently this is not the case and some stakeholders are clearly suffering on the back of this untenable situation.</p> <p>Much of this consultation, how it has come about and how it has been delivered appear to be in breach of the terms of the FMA 2012 between the IOM Government and the other four Fisheries Administrations. It is a very strange scenario for many reasons and hard to believe that the FMA 2012 and its terms even exist given that several parts of it seem to have been ignored on this occasion.</p> <p>Where for example is the required Impact Assessment for the proposed new measures (6c), why are several of the measures proposed indirectly discriminatory towards some stakeholders (6b), the proposals do not ensure fair access to each others waters for some vessels (6e) - terms relating to these and other concerning issues are rightly made clear in the FMA 2012 yet these conditions appear to have been ignored. Perhaps these proposals should be withdrawn until the terms of the FMA 2012 are met rather than ignored and the make up of the SMB is changed to genuinely reflect all stakeholders in the fishery. In the absence of both it would be very difficult not to see this discriminatory consultation as an opportunistic attempt to remove some stakeholders from the IOM scallop fishery by default.</p> <p>I can understand why some IOM interests who fish in Scottish waters are very nervous about the outcome of this consultation. When signatories to a formal agreement between administrations start acting like rogue nations in fishery management terms it has to be a real concern to anyone reliant upon fair access to each others waters as per the FMA 2012. The timing of this consultation while many stakeholders, their businesses, their families and their communities are still struggling to recover from the ongoing impact of the Covid Pandemic and Brexit is incredibly insensitive to say the least.</p>

Part 4 – Marine Scotland Response

The Department received one response from the UK Devolved Administrations, from the Scottish Government. The response was in the form of a generalised letter that did not address specific consultation questions, but rather the overall themes contained in the consultation, and is therefore not included in the quantitative analysis or qualitative summaries presented in Section 3. The response is summarised below.

General

The Scottish Government supported 'much in the document' and saw benefits in the development on a long-term management plan; however, there was a perception of disproportionate impact on Scottish-registered vessels relative to those registered in the Isle of Man.

The response criticised the consultation and the accompanying evidence base for lack of detail and depth, and questioned the need to focus on managing capacity when catch limits alone may be sufficient.

Scallop Management Board

Marine Scotland acknowledged the benefits of co-management but raised concerns over the representation of members on the Board. Marine Scotland questioned attendance and individual involvement of specific members.

Development of a Long Term Management Plan

Marine Scotland acknowledged the benefit in developing a long-term management plan; however, suggested that development of the plan should come before any consultation on specific proposals.

Access and Fleet Capacity

The Scottish Government's response made it clear that it held a perception of disproportionate impact on visiting vessels compared to Isle of Man based vessels. Marine Scotland suggested that the Department had underestimated the impact of the Western Waters Effort Regime. Further, Marine Scotland suggested that an alternative reference period and/or track-record criteria should be utilised to account for the difficulty for visiting vessels in building a track-record, suggesting this would be a 'logical extensions of [the Departments] non-discriminatory approach which aims to utilise measures that do not discriminate between fishers by reason of nationality'.

The response noted that Scottish-registered vessels had reportedly actively avoided Manx scallop grounds to allow for 'stock improvement'. The definition of 'latency' was deemed to be arbitrary, and that the reference period should include the 16/17 season, and 2019/20 should be excluded.

Fleet Capacity Management and Access Framework Options

Marine Scotland determined that the basis of a days-at-sea system was insufficient to provide a full analysis, but acknowledged that a days-at-sea system could be an effective means of regulation.

Grandfather Rights

Marine Scotland viewed the removal of Grandfather Rights as having a disproportionate impact on Scottish-registered vessels.

Dredges-a-side

Marine Scotland did not recognise the need to reduce dredge numbers in the 3-12 NM zone in the context of the output limits imposed on the fishery, citing a disproportionate impact on larger vessels.

Belly-ring, Teeth numbers, Tooth-spacing

Marine Scotland had no view on the proposed technical measures, but recommended that the Department work with stakeholders to help inform the potential impacts of the proposals.

Remote Electronic Monitoring

Marine Scotland advocated for the use of Remote Electronic Monitoring for both improved governance and scientific evidence gathering.

Additional Considerations

Marine Scotland supported the development of a dive-caught fishery, and noted with interest the proposals around funding industry-led surveys.

Conclusion

Marine Scotland cited a concern that the proposed management measures may breach the equal access objective in the UK Fisheries Act 2020, and have a disproportionate impact on Scottish vessels, and that these impacts were neither acknowledged nor explored adequately by the consultation and accompanying evidence base.

Part 5 – Conclusion

The Department wishes to thank all those stakeholders that submitted a response to the consultation. Officers will now consider and evaluate the consultation responses, and potential next steps.