**Questions on the King Scallop FMP**

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

The views expressed in this response are from the perspective of the Marine Stewardship Council (MSC), as Secretariat to Project UK, a collaborative partnership working towards an environmentally sustainable future for UK fisheries through the implementation of credible Fishery Improvement Projects. Project UK facilitates two King scallop fisheries improvement projects, one in the English channel, and one with fishing grounds in the North Sea, Irish Sea and West of Scotland. The views expressed here are a collective response from the Steering Group and not attributed to a necessarily representative of single person or organisation.

Overall we are happy with the FMP development process facilitated through engagement with the SICG. We commend and are supportive of the co-management approach, and seeking industry involvement in the development of measures to generate buy-in. We are supportive of this being the way future FMPs are developed and progressed.

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

The evidence presented on the current state of stocks seems thorough and clearly demonstrates the importance and value of the King scallop fishery to the UK economy.

Since the first King scallop FIP was commenced in 2017, focussed on the scallop fishery in the English channel (7.d and 8.e), it has been the ambition of the Steering Group to have biological reference points defined and it was understood at the time that a time-series of 7-10 years would be adequate to begin this process. The FMP acknowledges that biological reference points are seen as a priority, and we would therefore encourage the final FMP to clarify the process and timelines for defining biological reference points. We encourage prioritising research actions which will support the development of biological reference points to underpin a robust harvest strategies and harvest control rules.

Also to note, the scallop fishery in the Solent which is permitted through the Solent Dredge Permit Byelaw by Southern IFCA has not been captured in the maps provided in the FMP document. This fishery is made up of <12m vessels and is not surveyed by Cefas survey work. Southern IFCA have fishing effort and survey data which can be made available, and should be considered to support the interests of these small scale inshore fisheries. Further, other sources of information for the <12m fleet should be sought and included where possible.

We feel more emphasis could have been given to the Cefas reports by Reeves *et al.,* 2020 which have already examined alternative management measures to the current Days At Sea approach 12

Finally, we would encourage the drafting team to make more use of data which already exists from well-protected areas, which can be as a source of information for benchmarking and stock assessments. Good data exists from such areas in the Isle of Man, Lyme Bay and others.

Notes of other research conducted as part of the fisheries improvement projects is listed in Q1 of the Environmental Report section.

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

The evidence gaps identified in Annex 2 are extensive. This extensive list suggests years worth of work and significant resource investment, but it has not been mentioned how this would be resourced in terms of funding or staff time. The FMP should outline the timescale anticipated for data collection to produce enough information that gaps are considered complete enough to base initial management on.

Within Project UK, the Action Plans written for the King scallop FIPs, which aim to progress the king scallop fisheries to best practice fisheries management, require the delivery of a robust harvest strategy and harvest control rules which are responsive to the state of the stocks. This would begin with developing biological reference points as a priority. Therefore, we actively support a focus on research which supports the evidence base required for this.

We also encourage looking at where effort could be shared between different fisheries/research needs, and to examine where there could be efficiencies in data collection across the various FMPs.

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

Overall, it is clear from the actions in Table 1 and the research needs identified in Annex 2 that significant data collection is needed to support the implementation of a robust management structure. Many of the actions in Table 1 are broad in scope, and do not provide information on who is responsible for the delivery of the action.

The final FMP should clearly prioritise the actions that are needed to meet the original aim of the FMP which is ecological sustainability, and support the development of a management framework.

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

We believe that the priority should first be on developing a management strategy (harvest strategy), based on a prioritisation of all the things that are called for in the FMP.

While a closure strategy may be required, first a management strategy is required, which can then be supported by a variety of management measures. We are also aware of research that has been conducted which demonstrates that demonstrated that combining output controls with seasonal closures is a more effective means of protecting stocks that combining an effort regime with seasonal closures 1, 2.

Looking at the wider FMP objectives, the King scallop FIP action plans support I-VMS and VMS being implemented on all vessels to better understand the footprint of the fishery. If this information demonstrates areas where direct effects of the fishery remain a concern for any habitats, then a habitat management strategy, including potential area-based closures, should be considered.

We also encourage considering options such as ‘Go fish zones’, instead of protected areas. Fishing areas have been used in other areas such as off the Yorkshire coast, where areas are designated for scallop fishermen only. This is tightly monitored and helps alleviate gear conflict in areas of spatial squeeze.

**6 Are there particular stock areas you think closures could be beneficial to the FMP goals? Please provide any evidence you have that supports this.**

This needs to be considered as part of a management framework and/or closure strategy, informed by science and considered through the co-management approach. This could also be informed by the Project UK FIP action plan, for example currently the Lyme Bay area has the lowest MSC score of the four stock areas.

We encourage any closures to be considered in a systematic way, with an appropriate plan in place, and to include all stakeholders in the discussions on appropriate management to be implemented.

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

Overall, we do not support the strengthening of the current Days at Sea (DAS) measures, and support different management approached being developed. DAS does not support gear innovation and ‘smarter fishing’, which is needed to reduce the impact on the seabed and wider environment.

The FMP should also be used as an opportunity to support and improve technical gear legislation to improve gear innovation.

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

We believe this should be the main priority of the FMP and the timeline to deliver this should be prompt. From a FIP perspective, the scores for ‘harvest strategy’ and ‘harvest control rules’ are current scoring <60, which would immediately fail the fishery in an MSC assessment. Both of these scores are directly related to the development of output and/or input control.

We would also like to express that this has been discussed extensively already, in many forums. For example, one conference discussion is here : [UK Scallop Management Conference 2019](FINAL_UK%20scallop%20management%20conference_summary%20report_Mar19.pdf%20%28nwwac.org%29).

From an MSC perspective, scientifically based output controls such as a Total Allowable Catch have been demonstrated to be successful in other fisheries which have been certified to the MSC Fisheries Standard. Out of the nine currently MSC certified scallop fisheries globally, seven of these use a TAC based output system to sustainable manage exploitation, and many of these have been certified as sustainable for over 10 years.

 It is also worth mentioning the Marine Conservation Society Good Fish Guide ratings, which currently propose that King scallops are downgraded, due to the lack of a harvest strategy and harvest control rules in the fishery to control exploitation. This downgrading represents a commercial threat to the industry and should be used to highlight the urgent need to develop these measures.

We also acknowledge that this does not need to be a one size fits all approach, for example there could be one system inside of 12nm and a different approach outside of 12nm.

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

We understand that a lot of consideration has already been given to which measures should be considered so this work shouldn’t further delay that.

Additional things which have not been mentioned in this consultation that could be considered are gear measures which aim to increase and improve selectivity, reduce bycatch and reduce impact on the seabed.

We are aware of research which has been undertaken on Low impact scallop gear for example, which should be considered 3

The current Days at Sea management approach does not support gear innovation, and instead a TAC-based system would support innovation in this area which could lead to overall benefits to the wider environment.

The FMP could also consider new and innovative approaches to fishing gear such as potting for scallops, and the artificial intelligence scallop hoover currently being used in Norway. As this management is a long-term plan, it should also consider new and innovative ways of fishing.

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

Early action should prioritise the research needs (and resource requirements) identified to implement a science-based management framework focussed on stock sustainability and minimising ecosystem impacts.

As the MSC Fisheries Standard requires that all pressure on the stock is considered when assessing stock sustainability, measures which allow for the control of exploitation from both UK and EU vessels will be a key part of a successful management framework. Considering output controls at an early stage would be in line with the precautionary approach to manage exploitation.

There should be a priority on the evidence gaps to develop the management framework focussed on conserving ecological, social and economic sustainability.

We are disappointed with the timelines put forward in the FMP and believe that a wider suite of management measures could have been considered for consultation at this stage to deliver a precautionary approach. Overall, the timelines for development and implementation on a management framework should be significantly shortened in order to ensure the conservation goals are met in a timely manner.

It is also worth highlighting the timelines for the FIPs, which require progress in many areas covered within the FMP, but particularly development of harvest strategy and harvest control rules. These areas would currently fail the fishery in an MSC assessment. If the fishery was able to be certified as sustainable, this would have great social and economic benefits as more and more consumers are voicing their desire to purchase independently certified sustainable seafood.

Retail representatives within the Steering Group voiced that there is a strong risk customers will turn away from the FIP if they continue to see delays in progress against the action plan, which will have a negative impact on the scallop industry in English waters.

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

We have been happy with the approach of the co-management direction taken so far, as it seems to have produced successful collaborative efforts to date. Project UK is also a multi-stakeholder collaborative steering group, and we believe a co-management and co-decision making approach paves the way for a successful outcome with collective input and buy in from those involved in the fishery.

The Marine Stewardship Council, through the work of Project UK, has demonstrated a willingness to support the development of this and other national FMPs, through convening of the steering groups to input into early information gathering exercises and act as a sounding board for ideas. The MSC as facilitators of Project UK are keen to continue playing an active role in supporting the development of fisheries management in the UK.

The FMP discusses a management group to implement management measures, and it is important that this is a truly co-management group and includes wider stakeholders, and includes representatives from the area covered by the FMP.

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

Through continued engagement and options of multiple ways to received and feedback information. For example, online and in person webinars, information sharing events, and feedback sessions.

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

The effects and implications on the mobile and nomadic scallop fishing fleets should be considered, as this FMP only considers management in English and Welsh waters.

As mentioned, the two Project UK King scallop fisheries improvement projects are both due to finish in April 2024. To meet the MSC Standard, the FIP requires the implementation of a formal harvest strategy and harvest control rules which are responsive to the state of the stocks. The hope is that this will be delivered at pace through the FMP process, and significantly prior to the maximum timeline for review of 6 years from now.

There has been significant investment and support for the king scallop fishery through the FIPs, and

UK retailers have ambitious sourcing policies, requiring that the fisheries they source from are either in a FIP or have MSC certification to demonstrate they are sustainably sourced.

We also again highlight the need to consider any interactions between different types of fisheries (positive or negative), looking at cumulative impacts, research needs, and whether there are any efficiencies to be made with data collection and gear conflict solutions.

1. Reeves S. Management options for UK crab and scallop fisheries in Western Waters. CEFAS.

2. Reeves S. A literature review of management approaches for crab and scallop fisheries. CEFAS.

3. Sciberras, M., Fenton, M., Szostek, C., Delargy, A., Johnson, A., Hinz, H., Hold, N., & Kaiser, M. (2022). RD099: Low Impact Scallop Innovation Gear (LISIG) project.

**King Scallop FMP environmental report**

The following questions relate to the King Scallop FMP environmental report which can be found in the 'related documents' section on the home page.

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

Through the Project UK King scallop Fisheries Improvement Projects, a PhD has been funded through Herriot-Watt University which is looking at ‘*Understanding the consequences of scallop dredging in relation to seabed habitat types, conservation features and other industry sectors’.* Although outside the timeline of the initial publication, this is due for completion in the first half of 2024 and may provide useful information to consider.

A number of smaller pieces of work have been completed over the years for the scallop FIPs which may be useful:

* Ewen Bell (Cefas) 2017: *C7488: Project UK Fisheries Improvements: Task 4*
* Lambert, Gwladys., Martinez, Roi., and Mangi, Stephen (Cefas) 2019: *C7488 Project UK Fisheries Improvement - Task 5. Scallop ecosystem assessment Information for Scale Intensity Consequence Analysis (SICA) of performance indicator (PI) 2.5.1*
* Newstead, Steven., Hiddink, Jan., and Stewart, Bryce. 2020: *Project UK Channel Scallops: Action 7. Habitat Assessment*
* Holden, Rhiannon. 2017. Managing UK Fisheries for Risk: An Ecological Risk Assessment of Endangered, Threatened and Protected (ETP) Species and their Interaction with the Channel Scallop Fishery

There is also the work conducted through the GAP Scallop Management Workshops in 2014 , which can be found online:

<http://gap2.eu/gap2voices/channel-scallop-fishery-collaborating-for-a-sustainable-future/>

And the final report is here: [GAP2-Report\_2nd-Channel-Scallop-WorkshopFINAL.pdf](http://gap2.eu/gap2wordpress/wp-content/uploads/2015/06/GAP2-Report_2nd-Channel-Scallop-WorkshopFINAL.pdf)

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

Overall, the FIP action plan demonstrates that the controls are needed which bring about environmental benefit and innovations around gear efficiencies that lead to a reduced footprint and reduced impact on the seabed based on output control management framework. The FMP and it’s objectives should also consider other UK legislative requirements such as Good Environmental Status

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

NA

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

NA