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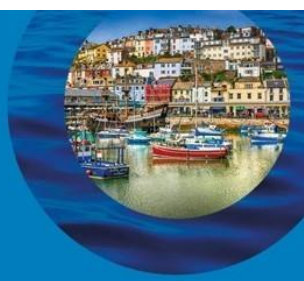
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# Response to the consultation on ICES division 7d and Lyme Bay area of 7e King scallop dredge fishery closure

## April 2024



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## Summary

The Marine Management Organisation (MMO), acting on behalf of all four UK Fisheries Administrations (UKFAs), sought views on proposals to close UK waters in ICES division 7d and Lyme Bay area of 7e to the king scallop (*Pectens maximus*) dredge fishery. **A closure period of 15 May to 30 September 2024 is the chosen option.**

The chosen decision extends the UK closure period from that of previous years and looks to address a 39% increase in landings observed in May 2023.

The chosen closure mirrors the EU closure of EU 7d waters to all UK and EU vessels in the king scallop dredge fishery. This closure option will offer increased protection to spawning stock in 7d and limits displacement from EU waters. Management of a parallel closure in the Lyme Bay area of 7e aims to limit depletion of this potentially vulnerable stock from displacement of fishing effort as result of the 7d closure.

UKFAs are committed to ensuring fisheries are managed to a level where stocks are healthy and fished sustainably, environmental damage is minimised, and economic return is maximized whilst ensuring sustainable exploitation.

## Proposed Closures

Two closure lengths were considered for ICES division 7d (see map in [annex](#) for further information) applied to vessels over 10 meters in length:

- 15 May – 30 September 2024, the same period as the EU closure of 7d to the king scallop dredge fishery, or
- 1 July – 30 September 2024, the same UK closure period as 2023.
- A no-closure option was also presented in the consultation.

Furthermore, a closure to the Lyme Bay area of 7e (see map in [annex](#) for further information) to vessels over 12 meters in length, aligning with the chosen closure period for 7d was also presented, alongside an option to keep Lyme Bay open regardless of the option chosen for 7d.

MMO also sought views on the proposal to implement the chosen management option for a period of two years. **It has been decided that a closure period of 15 May to 30**

**September will also take place in 2025.** The closure will remain under review for this period any data and scientific evidence will be analysed in the same manner as in previous years. Should analysis indicate significant changes during that period re-consultation will be required.

**The closures will apply to both EU and UK scallop dredge vessels.**

### **ICES Sub area 7d**

The most recent Centre for Environment, Fisheries and Aquaculture Science (Cefas) stock assessment published in 2023 indicates that most stock units in the English Channel, including ICES sub area 7d, are estimated to have been generally exploited at, or marginally below, the rate associated with maximum sustainable yield (MSY) over the last 6 years, with the exception of 2018 and 2021.

In 2018, harvest rates were more than double MSY, this was due to lower estimates of harvestable biomass rather than a significant increase in landings. Harvest rate estimations also indicated exploitation above MSY in 2021. Initial findings in area 7d suggest the stock continues to look relatively healthy, despite stock abundance estimations having shown a continued decline from 2020 to 2022. Cefas survey data collected in 2022 is currently being processed and will be available in April 2024, therefore evidence provided relates to the most recent stock assessment published in 2023<sup>2</sup> using data up to 2021.

In 2023 the under 12m fleet (UK and EU) landed a total of 546.49 tons in 7d, compared to 21,591.85 tons landed by the over 12m fleet (UK and EU).

A temporal shift in activity associated with increased landings in ICES division 7d and 7e in the months leading up to the EU scallop fishery closure in May was identified. Indeed, the quantity of scallops landed in UK 7d in May increased by 39% from 2022 – 2023, likely directly resulting from displacement of vessels from the May – September closure in EU 7d waters.

### **ICES Sub area 7e**

Scientific advice suggests the stock in Lyme Bay area of 7e has been highly exploited between 2017 and 2021, exceeding the MSY harvest rate each year, and showing a general increase in exploitation rate since 2019.

The estimated harvest rate was more than three times MSY in 2018 and 2021 and more than double in 2020. Estimated harvestable biomass in the Lyme Bay area of 7e has remained relatively stable since (and including 2018), following a decline in harvestable biomass of 51% from 2017 to 2018, therefore the closure of Lyme Bay would be a precautionary measure as based on Cefas advice given the current larval connectivity (larval import) estimated by the Cefas larval transport simulations. Simulations indicate management outside Lyme Bay may be as important as within Lyme Bay itself. However, as uncertainties exist about larval connectivity between the different assessment areas, local management measures in Lyme Bay remain important as it is unknown to what extent the stock is self-sustained.

As there has been a general trend of decline in stock abundance, and a sustained period of effort above MSY, despite closures being implemented in previous years, it has been determined that an increase to the closure period for both 7d and Lyme Bay area of 7e is proportionate in order to best protect stocks during spawning.

## Summary of Consultation Response

Twenty-three representations to the consultation were received including responses from industry groups, fisheries managers, NGOs and individuals (see annex for full summary of consultation responses). In summary, the majority of respondents agreed to a scallop closure in ICES division 7d, however there were differing opinions on the temporal extent of the closure. Some expressed support for a longer closure in UK waters to that of previous years, to maximise stock sustainability and mitigate current EU vessel displacement, while some cited economic impacts and effort displacement as rationale to avoid extending the closure. Overall, while there was a mixed response with regards to which closure should be chosen, the majority of respondents were in favour of the 15 May to 30 September closure of 7d, the same closures in EU waters<sup>1</sup>.

The majority of respondents confirmed that they wished to see a closure to the Lyme Bay area of 7e for the same period as that selected for 7d. The majority of respondents confirmed that they wished to see the chosen management option applied in both 2024 and 2025, so long as any closure remained under review and the data and scientific evidence was analysed in the same manner as in previous years.

Concerns raised by industry in the consultation regarding proposed closures included gear conflict (especially in mid-channel potting boxes), and additional pressure and impacts on other species such as brown crab resulting from displacement, spatial squeeze, economic losses. A distorted market for king scallops, and the disproportionate impacts of a closure on certain sections of the fleet.

Concerns raised by industry regarding a 1 June – 30 September closure primarily focused around displacement of vessels from EU waters and the resulting economic losses, and the future viability of the stock.

NGOs raised concerns that a June – September closure or a no closure option would increase the detrimental impact of dredging on the benthic habitats and the wider marine environment in the region, and limit habitat recovery.

There were divergent opinions regarding whether under 10 m length vessels should be exempt from the 7d closure. Some respondents were against the proposal and commented that the closure should apply to all vessel lengths for the following reasons:

- Smaller vessels tend to have mixed fishing activity throughout the year and could switch fishing activity from scallops during the closure period. Larger vessels on the other hand are more likely to be specialist scallopers and would thus be disproportionately impacted by a closure to 7d and Lyme Bay. It was argued that it would be unfair to exclude under 10m vessels from the closure based on any potential negative impacts while including larger vessels which were more likely to be specialised and thus suffer greater economic impacts as a result of any closure.
- Some under 10m length vessels are still capable of operating large numbers of dredges and harvesting large quantities of scallops.
- Including all vessel sizes would provide maximum stock and environmental protection from fishing activity.

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<sup>1</sup> [Publications Office \(europa.eu\)](https://publications.office.europa.eu)

Other respondents commented the 10 m and under fleet should be exempt from the 7d closure for the following reasons:

- The 10m and under fleet have limited capacity to move their fishing activity along the coast and into new fishing areas, and so the closure of 7d and Lyme Bay 7e would limit their ability to fish.
- Economic small port activity in ICES division 7d and the Lyme Bay area of 7e is reliant on inshore fishing activity continuing uninterrupted.
- The inshore fleet are dependent on a strong summer fishery as they have limited fishing opportunities in the winter months.
- Reduce the need for the inshore fleet to move into the offshore area of 7e and in turn decrease potential offshore fishing activity and impact on subsequent spatial squeeze.

Other management measures were proposed for the scallop dredge fishery in ICES division 7d and the Lyme Bay area of 7e; including a catch-based limit, dredge limit, single type vessel limits, effort days and no-take zones.

Comments received during this consultation and in previous years from stakeholders indicated that a holistic approach to management including potential impacts all relevant species would be a preferred approach. MMO will look to identify other species which could be impacted by the proposed closure and monitor VMS and landings data to consider whether the chosen management option is having an impact to nearby stocks of other species.

## **Response of the UK Fisheries Administrations and consultation outcome**

Having considered the consultation responses (a summary of which is available in the annex) and scientific advice (outlined in the consultation [here](#)) on the stock biomass, UKFAs have agreed to introduce a closure in UK 7d & Lyme Bay area of 7e (ICES rectangles 29E6, 29E7, 30E6 and 30E7, see map in annex for further details), for the king scallop dredge fishery from 15 May to 30 September 2024.

The 7d closure will apply to all UK and EU vessels in UK waters over 10 m in length, the Lyme Bay area of 7e closure will apply to all UK and EU vessels over 12 m in length. This management approach will be applied to both 2024 and 2025 but will remain under review for this period and the data and scientific evidence will be analysed in the same manner as in previous years. Should analysis indicate significant changes during that period re-consultation will be required.

When considering this decision UKFAs must be mindful of the principles of public law which includes requiring measures to be necessary and expedient for the regulation of sea fishing, as well as being proportionate and enforceable. UKFAs also considered the Fisheries Act 2020 in their decision making including the sustainability objective and environmental, social and economic considerations.

A summary of the reasoning for this decision is outlined below:

- ICES division 7d is split between the UK and EU Exclusive Economic Zones, making the king scallop population in this region a shared stock. Management in one area of 7d will have impacts on the other. In 2023 the EU closure of EU 7d waters was longer than the UK closure of UK 7d waters (15 May – 30 September compared to 1 July – 30 September). This resulted in displacement of effort from EU 7d waters into UK 7d waters in May 2023. The quantity of scallops landed in UK 7d in May increased by 39%



from 2022 – 2023. A 15 May to 30 September closure in UK 7d waters mirroring the EU closure will help to prevent displacement from EU waters and minimise the threat of overfishing of king scallops in UK 7d waters.

- Concerns about this displacement of fishing effort from EU waters were raised in the consultation. The majority of respondents felt that the most effect way to mitigate against this was to implement the 15 May – 30 September closure to UK 7d waters mirroring that seen in EU waters.
- The 15 May to 30 September closure in ICES division 7d will provide increased protection to king scallop stocks during the peak spawning period. The 15 May to 30 September closure will also help to further mitigate the adverse environmental impacts of dredging and increase the potential for habitat recovery.
- A concurrent closure in the Lyme Bay area of 7e would limit depletion of the stock due to displacement of fishing effort. This is particularly important due to the overexploitation of the stock in Lyme Bay and poor condition of scallops in the early summer months. Larval modelling suggests that Western Channel stocks are stocked by populations within 7e and there is a distinct barrier between eastern and western stocks. Further vessel activity in the Western Channel could disrupt the larval flow patterns which stock Lyme Bay.
- Mixed responses were received regarding the option to exempt under 10m vessels from the 7d closure. The MMO acknowledges the points raised regarding both sides of the argument. Landing data for 7d shows a 45% reduction in landings by the under 10m fleet from 2022-2023. During this period only two under 10m vessels fished 7d. This indicates a lower impact on the 7d scallop stock and the overall environment of the region. Furthermore, the reduction in landings from the under 10m fleet in 7d suggests a sector which is less resilient to further limitations. Although financial impacts are not the main driver to exclude fleet segments from the closure, due to the lower landings, lower capacity, lower mobility, and the reductions in landings of the under 10m vessels, it was considered overburdensome to include them in the 7d closure, considering their lower potential to impact the stock, and the social importance of the under 10m fleet to coastal communities.
- The decision to exempt smaller fleet sizes from the closure to the Lyme Bay area of 7e follows the same rationale for excluding under 10m vessels from 7d. Evidence suggests a high level of reliance on 7e for under 12m vessels. Due to the importance of Lyme Bay to under 12m vessels and the limitations of the vessels to travel to alternative fishing grounds, it was considered appropriate to exempt these vessels from the closure in the Lyme Bay area of 7e.

The chosen management option will be applied in both 2024 and 2025. This is to minimise stakeholder fatigue which could result from a consultation in 2025. It should be noted that this will remain under review for this period and the data and scientific evidence will be analysed in the same manner as in previous years. Should analysis indicate significant changes during that period re-consultation will be required.

The MMO will continue to monitor data, scientific advice and feedback from industry to ensure that the closure achieves its objectives. The MMO will focus closely on concerns and potential issues raised during the consultation:

- Concerns were raised over the potential exemption of under 10m vessels from the 7d closure and under 12m vessels from the Lyme Bay area of 7e closure. Monitoring and analysis of the impact of these vessel lengths will be undertaken

throughout the closure period to ensure fishing activity of these permitted vessels does not overly risk the objectives of the closure. Should this indicate that the objectives of the closure are not being met the MMO will react accordingly to undertake the most appropriate action. Concerns were raised that vessels displaced from 7d and the Lyme Bay area of 7e will encroach on mid-channel potting boxes, resulting in gear conflict and bycatch of other important species. MMO will look to identify other species which could be impacted by the proposed closure and monitor VMS and landings data to consider whether the chosen management option is having an impact to nearby stocks of other species. As part of the MMO's communications regarding the closure, these mid-channel potting box arrangements will be highlighted to increase awareness and aim to prevent displacement into these areas.

This decision had considered national policy such as the relevant marine plans and Joint Fisheries Statement to ensure the short term social and economic risks have been balanced with long term health of the marine environment that provide resilience to coastal communities whilst protecting the stock for future fisheries. Further consideration of environmental, social and economic themes and alternative scenarios is available in the annex.

This decision does not set a precedent for any potential future closures, and future decisions on fishing effort and gear restrictions will be made through the king scallop fisheries management plan using best available scientific evidence and with input from a cross section of the scallop industry.

Improving non-quota species management, including shellfish stocks, is a priority for UKFAs and Government as we work towards developing and implementing longer term approaches. This will be supported through the Fisheries Management Plans and international agreements on non-quota species such as the Trade and Cooperation Agreement, as set out in the Joint Fisheries Statement.

Exercises such as this consultation and the introduction of improved measures, alongside continued engagement with industry and scientists, will help inform these longer-term management approaches and improve the evidence on which decisions around future management will be based. This approach will also help to ensure the impacts of any future management measures are fully understood, both in terms of the likely socio-economic impacts and the level of protection they provide to the stocks.

The decision has been assessed against the South<sup>1</sup> and the Southwest<sup>2</sup> Marine plans:

This activity is compliant with the following marine plan policies in the South Marine Plan<sup>2</sup>: S- FISH-1, S-EMP-2, S-SOC-1, S-BIO-2, S-FISH-4. The remaining policies in the South Marine Plan are not applicable to this decision.

This activity is compliant with the following marine plan policies in the Southwest Marine Plan<sup>3</sup>: S- FISH-1, S- FISH-2, S- FISH-3, S-EMP-1, S-SOC-1, S-BIO-2. The remaining policies in the Southwest Marine Plan are not applicable to this decision.

## Next steps

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<sup>2</sup> <https://www.gov.uk/government/publications/the-south-marine-plans-documents>

<sup>3</sup> <https://www.gov.uk/government/publications/the-south-west-marine-plans-documents>

The following closure in UK waters for the king scallop dredge fishery will be enacted via a fishing vessel licence variation:

- ICES division 7d for UK and EU vessels over 10 m in length from 15 May to 30 September 2024 and for 15 May to 30 September 2025
- Lyme Bay area of 7e (ICES rectangles 29E5, 29E7, 30E6 and 30E7) for UK and EU vessels over 12 m in length from 15 May to 30 September 2024 and for 15 May to 30 September 2025

Any fisher who is the nominated contact on the domestic fishing vessel license system and has either a scallop flag or declared dredges as a gear option will be informed via an email notification when the variation is enacted.

All respondents to the consultation will be informed of the decision by e mail.

### Useful Information

Topic of the consultation:	To ask for views on a closure of ICES division 7d and 7e (Lyme Bay area) king scallop ( <i>Pectens maximus</i> ) dredge fishery between: 15 May - 30 September, 1 July – 30 September or No closure With consideration given to exempt the 12 meter and under fleet.
Scope of this call for evidence:	To seek views, evidence, and impact information on a closure of ICES division 7d and the Lyme Bay area of 7e for the king scallop dredge fishery.
Geographical scope:	ICES division 7d and Lyme Bay area of 7e (ICES areas, 29E6, 29E7, 30E6, 30E7)
Those consulted:	Scallop fishing and processing industry, IFCA's, Crown Dependencies, NGO's academics and members of the
Body/bodies responsible for the Consultation:	MMO: Fisheries Management Team, Defra and UKFAs.
Duration:	The consultation ran from 07 December 2023 – 14 February 2024.
Enquiries:	For any enquiries about the consultation please contact <a href="mailto:sustainablefisheries@marinemanagement.org.uk">sustainablefisheries@marinemanagement.org.uk</a> .

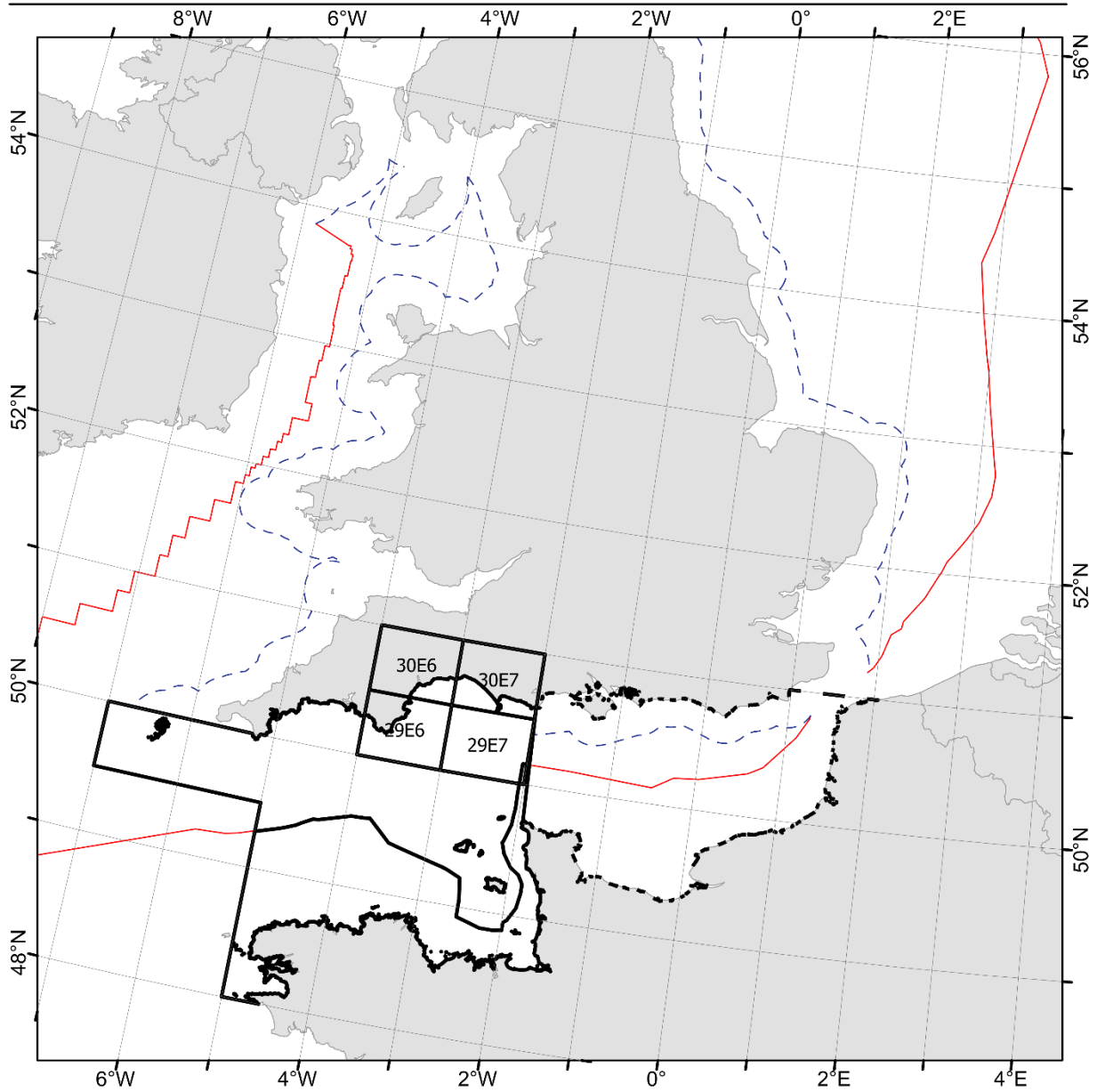


# Annex



Marine Management Organisation

## ICES area 7d and 7e (Including Lyme Bay Area - 29E6, 29E7 30E6 and 30E7)



- |                                   |                             |
|-----------------------------------|-----------------------------|
| Maritime Boundaries               | ICES Statistical Rectangles |
| UKHO 2020 12nm Limit              | ICES Area 7d                |
| UK Exclusive Economic Zone (2013) | ICES Areas 7e               |

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## **Further information on UKFAs consideration of the consultation.**

### *Environmental theme*

- Scientific evidence suggests a closure can protect the stock during spawning as well as reducing the environmental impacts from dredging. Peak spawning is typically summer, although spawning events occur from spring through to October.
- The potential impacts of any closures are uncertain. A closure would be expected to materialise as an increase in the average level of future recruitments. However, it would be difficult to separate management benefits from natural variability for a single event. The additional benefits of a longer closure compared with a shorter closure is also unknown.
- If overall effort patterns across the year are not reduced, it can negate any positive impact of a closure.
- If any displaced effort from the 7d closure is redirected to Lyme Bay, there is a risk to the sustainability of the local scallop population.
- Landing data and scientific advice indicates that vessels UK under 10 m may have a lower capacity of impacting spawning potential due to the small number of removals. During 2023 UK vessels under 12 m reported the lowest landings for every month (so far). The largest reductions in landings by vessel fleet sector was seen in the 10 m and under fleet, with landings just over 700 t in 2022 and 434 t in 2023. In both years the sector was exempt from the closure, although landed quantities in the summer months were very low, with 14 t landed in the 2022 closure period and 0.2 t landed in the 2023 closure period.

### *Social and economic theme and alternative scenarios*

- It was considered that a shorter closure of 7d between 1 July – 30 September (the same closure as 2023) would reduce short term economic impacts on the fleet, especially the larger, more specialised vessels.
- However, consultation responses suggested that there could be significant displacement into 7d from EU vessels if the closure did not match that implemented in EU waters.

Consultation responses suggested that an extended closure could have increased benefits for stock and environmental health.

### *Lyme Bay closure scenarios*

- The consultation has raised the issue that further investigation is needed into the overall levels of fishing activity in Lyme Bay that may need to be managed from a comprehensive approach.
- A no closure option for the Lyme Bay area of 7e was considered. It was suggested in some of the responses to the consultation that this might help to spread displacement from 7d, and may help to prevent resulting gear conflicts and impacts on other fisheries in important areas such as the mid-channel potting boxes.
- However, responses to the consultation highlighted displacement from 7d into 7e as a concern. A scenario where Lyme Bay remained open during the closure period could have resulted in over-exploitation of the stock.

### *Exclusion of the 10m and under fleet from the 7d closure and 12m and under fleet from the Lyme Bay 7e closure*

- There were several responses that supported the closure for all fleet sizes, as it

was suggested that small vessels were less likely to be specialist scallop vessels and could access alternative fisheries.

- It was also suggested that smaller vessels still had a significant impact on the fishery and wider environment of the region.
- However, others suggested the closure has a disproportionately large financial burden on the small local fleet which lack the support and resilience to change fishing locations.
- The largest reductions in landings by vessel fleet sector was seen in the UK 10 m and under fleet, with landings of 434 t in 2023. In this year the sector was exempt from the closure,
- The capability of the 10.01 - 12 m fleet has been investigated through landing data. Between 2022 and 2023 a reduction in landings and vessel numbers was seen for this category. In 2023 in 7d under 12 m vessels reported the lowest catches for every month between January – September.

### **Summary of Responses to the Consultation Questions**

This consultation ran from 7 December 2023 to 14 February 2024 with information on background of the fishery, reasoning for the proposed closure and consultation questions available for review [Here](#)

Those individuals who are the nominated contact on the domestic fishing vessel licence system, and other interested parties were directly emailed to notify them of the consultation. There were also communications regarding the consultation on social media.

Twenty-three representations to the consultation were received including responses from industry groups, fisheries managers, NGO's, individuals and a mixture of sectors from under 10 m vessels to over 15 m vessels. Further detail of responses can be found below, numbers presented below are to indicate general responses to the consultation and are not indicative of the number the people each respondent was representative of:

Summaries of the views received are set out below:

1) The options for proposed 7d king scallop dredge fishery closures are:

- 15 May to 30 September 2024 – a closure period that aligns with the EU closure of 7d to the king scallop dredge fishery.
- 1 July to 30 September 2024 – the same closure period as 2023.
- No closure within 7d within any time period.

16 of the 23 respondents agreed that a 7d scallop closure was needed.

Of the 23 respondents, nine favoured the 15 May to 30 September closure option while seven favoured the 1 July to 30 September closure option. Respondents that supported the 15 May to 30 September were concerned about the stock levels in 7d, wished to reduce the risk of any EU displaced vessels working in UK 7d, and felt the closure would support the future work of the Scallop Fisheries Management plan and

future king scallop Multi Year Strategies.

Respondents that favoured the 1 July to 30 September closure stated that the closure period would offer protection for the spawning stock while minimising economic impacts, especially for larger, more specialised vessels. Respondents who selected this option cited how the stock appeared to be doing well, and thus the same management as last year should be implemented this year.

Alternative management measures other than closures were suggested, including limiting the number of dredges allowed to a maximum to 14 per side, introducing beam length restrictions, TAC, single-type vessel limits, re-evaluating the effort days, reducing overall effort, and area-based closures.

*A proposed closure prohibiting scallop dredge fishing in Lyme Bay area of 7e (ICES rectangles 30E6, 30E7, 29E6 and 29E7) that aligns to the dates of the proposed 7d closure.*

Of all the responses for the consultation, nine were in favour of closing Lyme Bay area of 7e for the same period as 7d. The rationale behind supporting this additional spatial closure was that the area has been fished above maximum sustainable yield in the recent past and stock levels would not sustain if the displacement from 7d was focused on the area.

There were two responses who disagreed with the proposal to close Lyme Bay. A few points were raised; including the need for more information to support the closure and introducing other measures such as gear restrictions before closing the area. There was concern that if Lyme Bay was closed there would be an increase in displacement and spatial squeeze which would lead to gear conflict between the trawling/dredging fleet and the static gear fleet. Gear conflict has negative financial implications to the industry as there may be cumulative losses of gear, landings and fishing time. The Lyme Bay closure could also have a negative impact on the voluntary agreement between the trawlers and the potters in the mid channel potting boxes and force the fishery westwards into Cornish waters and south into Channel Island waters.

*Do you think the closure of 7d should only apply to vessels greater than 10 m in length? (i.e., vessels 10 m and under in length are exempt from the closure) Please provide any reasoning.*

Reasons given in support of the statements were that the smaller inshore fleet had other constraints such as weather and effort limit through gear restrictions.

Of the 23 responses 7 disagreed that any length-based restrictions should be enforced, and that all vessel sizes should be included in the closure. Reasons for this varied, with respondents citing that to offer maximum environmental and stock protection all vessel lengths should be included, that some under 10m vessels are still capable of operating large numbers of dredges and harvesting large quantities of scallops, and under 10m vessels are less likely to be specialist scallop vessels and thus would be less negatively impacted by any closure.

*MMO are considering the proposal for the chosen management option to remain in place for a period of two years. This is being considered in order to reduce the necessity for stakeholder engagement, whilst allowing continued management of king scallops in 7d*

*and 7e. The MMO will still consider evidence and data to ensure management remains relevant. Should any evidence or analysis of data during this period indicate further considerations are necessary in order to ensure management remains appropriate we will complete a full consultation.*

Of the 23 respondents 14 responded to this question of which 11 agreed that the MMO should implement the chosen management measure for the period of two years, so long as evidence and data was reviewed to ensure that management remained relevant. Reasons cited included consistency of management, and one respondent even called for the measure to become permanent. It should be noted that many of the respondents included the caveat that they supported this so long as their preferred closure length was selected.

Three of the respondents suggested that they would not wish to see the chosen closure implemented in 2025 (while remaining under review), however they stated that they would support this should a longer closure of May – October to align with EU restrictions be introduced.

*How would these proposed closures of ICES division area 7d and Lyme Bay area of 7e to scallop dredging impact you and your business?*

Out of the 23 respondents there were 14 responses to this question. Four responses were in favour of the closure and said that the short-term loss from this closure would lead to long term gains in terms of stock levels and economic terms. Several respondents noted they had increased fishing effort prior to previous closures to offset economic losses, but that this had resulted in a distorted market for scallops and lower prices. Three respondents stated that the environmental benefits of any closure outweighed the potential economic costs. Three respondents stated that a longer closure than last year would have severe economic impacts, as the margins for profitability were already small.

*If you are a vessel owner/vessel agent or skipper: in which length group is your vessel; 10 m and under, 10.01 m – 12 m, 12.01 m – 15 m and the over 15 m fleet?*

- At least five respondents represented under 10m vessels.
- At least five respondents represented 10.01m - 12m vessels.
- At least three of the respondents represented 12.01m - 15m vessels.  
At least twenty-two respondents represented 15m+ vessels.

#### *Other Comments*

There were several responses which stated that a longer closure of May – October would be more beneficial than the current closure.

A number of other management options were proposed including gear restrictions, restricting the number of dredges, beam lengths, TACs, area-based closures, vessel-type closures, and the number of days that can be used for fishing. Two respondents stated that there was no scientific evidence to back up the closure. One respondent stated that the Scottish fleet would be disproportionately impacted by any closure. Another response suggested the closure should consider the external factors that the



fishing fleet are currently having to endure such as rising fuel, maintenance and processing costs that were eroding profit margins. Some respondents suggested that dredging should be completely phased out of the fishing industry altogether.

The chosen management does not aim to adversely impact any particular fleet, however it is recognised that larger Scottish vessels who travel to fish in 7d and 7e will be directly impacted by the chosen closure. MMO will observe this fishing patterns of the smaller vessels permitted to fish during the closure to understand the level of impact and determine whether changes in patterns reflect an increased risk to the aims of the closure.