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# **Executive summary**

Marine Management Organisation (MMO) was commissioned by the Department of Food and Rural Affairs (Defra) to deliver proposal three of the <u>Crab and Lobster fisheries management plan (FMP)</u>. Proposal three of the FMP suggested a brown crab (*Cancer Pagurus*) trial in the South West area (Figure 1, Annex 2). The aim of the trial was to test management on a regional scale following a co-design approach. For this document 'brown crab' refers to the species, *Cancer Pagurus*, that is also known as 'edible crab'.

The South West Crab Trial Group was established to help deliver proposal three and advise MMO on proposed management options for the trial. During engagement with the group, there was unanimous support for the harmonisation of brown crab **minimum conservation reference size (MCRS)**, sometimes referred to as minimum landing size (MLS), in the South West trial area.

Regional regulation has meant that there are different brown crab MCRS depending on where the fish was caught (please see Table 1, Annex 1).

Given the significant stakeholder support and anticipated long-term benefits to crab stocks in the South West, the government proposed the harmonisation of MCRS should be a permanent measure in the South West rather than a trial.

MMO on behalf of Defra launched an online survey to gather stakeholder feedback. The survey opened on 31 July 2025 and closed on 17 August 2025. The survey received **78 responses** and **82%** of respondents were in favour of the permanent measure.

Considering the strength of support and challenges facing the fishery, MMO will proceed with the introduction of a harmonised MCRS for the South West (Figure 1, Annex 2). This means that there will be one MCRS for male brown crab (160 millimetres 'mm') and one MCRS for female brown crab (150 mm). The measure will apply to all UK and EU vessels, using all gears. Due to the survey support for a quick response the measure will initially be placed in a vessel licence condition that will come into effect on 1 February 2026.

Additionally, the survey showed concern regarding increasing effort in the fishery through the increased number of pots deployed in the fishery. Investigation of effort management in the fishery is one of the medium to long-term goals of the FMP (Proposal 4) and work on this is being developed by Defra. There was also strong support for a closed season in the winter months.

## 1. Introduction

Marine Management Organisation (MMO) was commissioned by the Department of Environment, Food and Rural Affairs (Defra) to deliver Proposal three of the <u>crab</u> and lobster fisheries management plan (FMP) to 'pilot [trial] finer scale management for brown crab and lobster in selected fishery units'. For this document 'brown crab' (Cancer Pagurus) refers to the species that is also known as 'edible crab'.

To support the delivery of proposal three, the South West Crab Trial Group (SWCTG) was established in 2024. MMO explored potential trial management options for the South West brown crab fishery with the group, Defra and Inshore Fisheries and Conservation Authorities (IFCAs). Further information on the trial management options and feedback from the SWCTG is available from the <a href="mailto:options">options</a> paper, <a href="mailto:summary of online meetings">summary of online meetings</a> and <a href="mailto:online survey overview">online survey overview</a> documents available on the <a href="mailto:South West Regional Fisheries Group">South West Regional Fisheries Group</a> (RFG) website.

There was unanimous support from the SWCTG harmonising the **minimum conservation reference size (MCRS)**, also referred to as the minimum landing size, for brown crab in the South West brown crab area (Figure 1, Annex 2). The brown crab MCRS will be 160 millimetres (mm) for male crab and 150 mm for female crab.

Annex 1, Table 1 summarises the current legislative framework regarding brown crab MCRS in the South West and the changes that will be adopted due to the new measure.

Given the support from the SWCTG and anticipated long-term benefits to crab stocks in the South West, the government proposed the harmonisation of MCRS should be a permanent measure for the South West rather than a trial. Based on this and acting on feedback received from the SWCTG, MMO on behalf of Defra launched a consultation in the form of a mobile friendly survey.

The purpose of this document is to provide you with the responses received, survey outcome and intended next steps (including how any changes will be implemented).

## 1.1. Structure of this document

**Section 2** – provides information on the online survey, including the responses received, MMO's response and the outcome of the survey

**Section 3** – sets out the rationale, with the scientific, social and economic, and legislative and regulatory considerations that underpin the decision.

**Section 4** – outlines MMO's next steps and how the closure will be implemented.

**Section 5** – provides contact details for MMO should you wish to contact us with regards to the survey

**Annexes** – provide supplementary information which may be useful to refer to (for example a chart of the South West brown crab area.

## 2. Consultation

### 2.1. Overview

On 31 July 2025, MMO, on behalf of Defra, launched a consultation via a short online survey on the proposal to permanently harmonise MCRS for brown crab within the South West brown crab area (Figure 1, Annex 2). The online survey ran from 31 July to 17 August 2025.

MMO would like to thank everyone who responded to the survey. We received **78 responses**. Your responses have allowed us to make the most informed management decision.

In section 2.2 below we present the questions asked and the responses you provided to the survey. Annex 4 contains question 13 which asked if respondents had any other comments.

## 2.2. Summary of responses

This section provides the questions asked during the survey and a summary of the responses received. These have been grouped into sections (potential harmonisation measure, about you and your business, priorities for the future, online survey method and any other comments). Please note that some questions allowed for more than one answer option to be chosen, so the number of answers may be greater than the total number of survey responses.

## 2.2.1. Proposed harmonisation of MCRS measures

#### Question 1.

We asked: 'Do you support the harmonisation of brown crab minimum landing size (160 mm male, 150 mm female) in the South West?'

#### You said:

Option for response	Responses
Yes	64
No	12
None of the above	2
Total	78

82% (64) of respondents were in favour of the harmonisation of brown crab MCRS in the South West. 15% (12) were not in favour and 3% (two) chose 'none of the above'. The reasoning provided for choosing 'none of the above' included that these respondents were concerned that effort management was a larger issue and that all decisions should be underpinned with good scientific evidence.

#### Question 2.

<u>We asked</u>: 'Please provide a reason for why you do/do not support the harmonisation of brown crab minimum landing size (multiple choice)'

#### You said:

Option for response	Responses
I support it because it will help improve crab stocks	60
I support it because I fish for that size crab anyway	26
I support it because it helps that it's the same size across different areas in the South West	38
I am neutral because I don't think it will negatively or positively affect the crab stocks	3
I am neutral because I don't think it will affect my business or fishing activity	0
I do not support it because it will negatively impact my business	8
I do not support it because I don't think it will have a positive impact on the crab stocks	10
I do not support it because it will have an impact on other stocks	1
Other	1

Many respondents included multiple answers for supporting or not supporting the proposal to harmonise brown crab MCRS. The most supported statement was that the harmonisation would help improve crab stocks. This statement is supported by scientific advice, because there is a positive relationship between crab size and fertility. Respondents that chose the "other" option stated they wanted further simplification of brown crab MCRS, to have only one size regardless of sex.

#### Question 3.

<u>We asked</u>: 'If this measure were to come into force how long would you need to adapt to a size change'?

#### You said:

Option for response	Responses
No time	64
3 months	3
6 months	3
1 year or longer	8
Total	78

Many respondents expressed the need to introduce management measures in the fishery as a matter of urgency. 82% (64) supported the immediate introduction of brown crab MCRS harmonisation in the South West. All the responses that wanted more time before the introduction of the measure stated that the measure would

have a negative impact on their business and they did not believe the measure would improve the stocks.

## 2.2.2. About you and your business

#### Question 4.

<u>We asked</u>: 'What are the impacts on you and your business of increasing the minimum landing size for brown crab in the South West? (multiple choice)'

#### You said:

Option for response	Responses
Little or no impact	48
Short term loss in landings and revenue	26
Changes in supply, pricing and demand for crab	6
Potential for stock recovery and increased further yields	17
Long term loss in landings and revenue	9

68% (48) of the responses to this question thought that the measure would have little or no impact on their current fishing business. Of those, 18 respondents felt the impacts of the measure would be minimal as they were already fishing to the size due to existing IFCA byelaws. Of the nine respondents who stated the measure would have a long-term impact on their business, none supported the measure. One, cited the lack of other fishing opportunities in the South West as one of the drivers for reliance upon the current crab fishery as the main income for their business.

#### MMO response to MCRS harmonisation in the South West. (Questions 1 to 4)

82% supported the option to harmonise the brown crab MCRS, the same number chose for immediate adoption of the measure. 76% believed the measure would have a positive impact on the crab stocks.

Of those who expressed a negative response to the harmonisation of brown crab MCRS, 10% were concerned about the impact on their business and 12% did not think there would be a positive impact on stock responses.

During the South West crab trial work there was strong support to simplify the current measures, increasing compliance and assurance, and easing burdens and costs associated with fragmented regulation. The survey clearly continues that level of support throughout the wider stakeholder group.

It is acknowledged that all changes to regulation have some impact, however, there was strong support that this measure would improve the crab stocks. MMO will continue to work towards easing regulatory burden while enabling a sustainable future for the future.

#### Question 5.

We asked: 'Do you consider your business to rely on brown crab all year round?'

#### You said:

Option for response	Responses
Yes	43
No	35
Total	78

70% (30) of the 43 respondents who stated they relied on the brown crab fishery year-round supported the MCRS measure. 97% (34) of the 35 respondents who did not rely on the brown crab fishery all year round also supported the proposed MCRS harmonisation.

#### Question 6.

We asked: 'Do you swap into another fishery for part of the year, in which other fishery do you work? (Free text- included multiple answers)'

#### You said:

Option for response	Responses
Trawling (unspecified)	2
Pollack	3
Octopus	4
Gill and tangle netting	5
Lobster	13
Whelk	5
Clam	1
Ray	3
Crawfish	2
Bass	5
Mackerel	1
Spider crab	1
Ray	3
Red mullet	1
Not applicable/not answered	49

51 (65%) of the respondents to the survey did not give an answer to this question. Of the 27 respondents that gave details of other fisheries that supported their income, it was notable that other shellfish dominated the answers given, and 16 gave multiple answers.

#### Question 7.

We asked: 'Please select which option best describes your role in the crab fishery?'

#### You said:

Option for response	Responses
Commercial fisher	58
Processor	4
Buyer	5
Recreational fisher	5
Non-Governmental organisation	1
Regulator	1
Charity	1
Scientist or academic, Agent, Producer Organisation or	0
Fisheries Association	
Other	3
Total	78

74% (58) of respondents to the survey were from the commercial fishing sector and 11% (nine) from buyers and processors. 6% (five) of respondents were from the recreational sector. No responses were received from scientific or academic, agents, producer organisations or fisheries associations.

#### Question 8.

We asked: 'If you are a vessel owner/agent/skipper or crew what size is your vessel(s)? You can select more than one option'.

#### You said:

Option for response	Responses
Under 10 metres (m)	44
10 to 11.99 m	10
12 to 14.99 m	10
Over 15 m	7
None of the above	15

The demographics of the responses reflects the nature of the brown crab fishery in the South West with 44 responses (56%) from the under 10 m fleet. There was no discernible relationship between vessel size and support for the measure.

Of the 78 responses, 15 (19%) did not answer this question. Of the 15, eight were processors and buyers and the others were from the recreational fishery, charity, regulatory and non-government organisation sectors. There were five respondents that indicated multiple vessel ownership.

#### Question 9.

We asked: 'Which is your main port of landing or location of work?'

#### You said:

Option for response	Responses
Appledore, Axmouth, Coverack, Exmouth, Helford River,	0
Ilfracombe, Lynmouth, Mousehole, Penzance, Polperro,	
Portland, Porthleven, River Dart, Sennan, South Wales,	
Yealm River	
Bude, Clovelly, Looe, Par, Teignmouth, Weymouth	1
Falmouth, Mevagissey, Padstow, Plymouth, Poole	2
Beer, Cadgwith, Lyme Regis, St Ives	3
Brixham, Newquay	4
Salcombe	8
Dartmouth	11
Newlyn	13
Other	10
Total	78

The largest proportion of responses came from the larger ports such as Newlyn (13) or those ports that are most focussed on the shellfish fishery, Dartmouth (11).

#### MMO response to survey demographics (Questions 5 to 9)

The survey has been responded to from all sectors of the fishery throughout the South West area, with notable respondent numbers from Newlyn, Dartmouth and Salcombe. This was expected as those ports are known for the large number of vessels engaged in the fishery.

74 % of the responses were from commercial fishers and of those 56 % were from the under 10-metre fleet, which reflects the importance of the fishery to the smaller fleet. Half of the commercial fishers stated they relied on the crab fishery as their main income.

During the development work of this measure MMO were advised that the summer is one of the busiest periods for the fishing industry, therefore MMO looked at different ways to engage with fishers. Despite the lack of face-to-face engagement and port visits it is felt that the survey process did reach all parts of the fishing community.

## 2.2.3. Priorities for future management

#### Question 10.

<u>We asked</u>: 'To help focus future work on crab in the South West, what would be your highest priority to help improve the stock?'

#### You said:

Option for response	Responses
The number of days a vessel can fish	10
The number of pots in the fishery	45
Effort in fishery in the 6 – 12 nautical miles (nm)	10
Closures based on sex and season	6
The creation of gear specific areas/technical measures	7
Total	78

The survey results show a positive response (58%; 45 responses) to investigating pot numbers in the fishery.

#### MMO response to priorities for future management (Question 10)

One of the FMP medium to long term objectives (Proposal 4) is to progress work to develop an effort management strategy for crab (and lobster). Defra with MMO support are prioritising developing effort management for crab and lobster fisheries working with the crab and lobster implementation group. The outputs of this survey along with previous stakeholder engagement feedback will help future management development.

## 2.2.4. Online survey method

#### Question 11.

We asked: 'We hope this survey was easy to complete, do you agree?'

#### You said:

Option for response	Responses
Strongly agree	40
Agree	30
Neither agree nor disagree	6
Disagree	1
Strongly disagree	1
Total	78

This is the first time that an online survey has been used for the FMP implementation work. 90% (70) of respondents felt that the survey was easy to complete. Of those that didn't agree, one response stated that they would have preferred more free text response options.

#### Question 12.

<u>We asked</u>: 'Do you prefer short surveys to the traditional consultation process (online/email)?'

#### You said:

Option for response	Responses
Yes	60
No	2
No opinion	16
Total	78

77% (60) of respondents preferred this style of consultation when compared to the more traditional consultations used for FMP implementation and wider fisheries management to date that have required an emailed response to questions asked in a consultation document.

MMO response to the survey process section. (Questions 11 to 12)

This is the first time that a survey has been used as part of the FMP implementation process. The survey process was significantly well received with 89% of all respondents stating the survey was easy to complete and 75% said they preferred this method to the usual online consultation process. Future consultations may follow this format especially in the busy summer months.

### 2.3. Consultation outcome

MMO will implement the harmonisation of the brown crab MCRS in the South West (Figure 1, Annex 2). The new MCRS will be 160 mm for male brown crab and 150 mm for female brown crab in English waters of the South West. It will apply to all UK and EU vessels, using all gears. This measure will be implemented via a vessel licence condition and the new MCRS will apply from 1 February 2026.

In making this decision MMO has considered relevant policy/legislation (for example, marine plans and the Joint Fisheries Statement) to ensure the social and economic risks have been considered alongside the long-term health of the marine environment – please see section 3 below for further information. This decision does not set a precedent for any potential future management proposals.

## 3. Rationale

There are various aspects that underpin the decision-making process for MMO. For the purposes of this document these have been summarised into three aspects - scientific and environmental, social and economic and legislative. Please see sections 3.1 to 3.3 below.

## 3.1. Scientific and environmental considerations

The purpose of the increase in MCRS is to reduce fishing mortality on spawning stock to increase opportunities for brown crab to spawn before they are removed from the fishery. There is a positive relationship between brown crab size and

fecundity and the increase MCRS may help improve the stock in conjunction with other measures.

The FMP draws on the best available evidence to assess the health of crab stocks across English waters. Current evidence suggests there are high exploitation rates, potentially exceeding levels needed to maintain stocks at Maximum Sustainable Yield (MSY). High levels of fishing pressure can deplete the spawning stock and impair recruitment, leading to reduced fishery productivity and resilience. If recruitment drops below threshold levels, the risk of a stock collapse increases. This raises concerns about the long-term viability if fishing pressure continues unchecked.

There are also concerns regarding the declines in crab landings around the UK, (see Annex 3, Figures 2 and 3) most notably since 2020. The South West has seen a large increase in the number of common octopus in the channel which has compounded the decline in crab this year.

It is acknowledged that throughout stakeholder engagement events the main concern expressed is the increased effort and declining catch rates in the crab fishery. Following work with the SWCTG it was decided that it is not the right time to investigate effort trials due to the impact of octopus on catches in the Western Channel. However, MMO and Defra remain committed to investigate effort in the fishery and will continue working with industry group to address the issue.

The FMP acknowledges that the stock assessment methods still carry uncertainties, and the impact of fishing effort on stock sustainability is not yet fully understood. To address this, the plan takes a precautionary and adaptive approach, combining existing management tools with new measures aimed at improving data quality and filling evidence gaps.

This approach ensures that crab fisheries are managed not just for today, but with a long-term vision for ecological and economic sustainability. This is reflected in the positive survey responses supporting the fast introduction of the measure whilst acknowledging the short-term losses.

## 3.2. Social and economic considerations

There are likely economic losses due to any change in the brown crab MCRS as it will likely reduce available landings in the short term. However, this region already tends to operate at these larger sizes due to IFCA management in the districts of Cornwall, and Devon and Severn.

In general, in the South West landings of brown crab have declined most notably, since the pandemic in 2020. A comparison of 2023 and 2024 UK landings data in the South West<sup>1</sup> (Annex 3, Figure 3) shows an approximate 25% reduction in the annual value of the landings. When a similar comparison is made between 2024 and 2025 there is a further 36% decline in the value of crab landings. In 2025 further pressure

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<sup>&</sup>lt;sup>1</sup> United Kingdom (UK) landings data taken from International Council for the Exploration of the Sea (ICES) areas 7e, 7f, 7g and 7h, (see Annex 3, figure 3) from 2023 to August 2025

has been placed on this fishery from the octopus bloom in the Western English Channel. MMO are providing a response to the bloom and as part of this have been monitoring the landings of octopus and shellfish species. Further published information on the octopus response (including landings information) can be found on the South West RFG web pages.

For this overview of the economic impact of the harmonisation of MCRS in the South West the size, length and sex ratio data was extrapolated from the 2023 Isle of Scilly IFCA (IoSIFCA) stock status report. The length/size data has been used as a proxy for the entire area. This assumption does carry a risk that the population in the Isles of Scilly is representative of the fishery in the South West, however the IoSIFCA report was the best evidence available at the time.

Extrapolating the IoSIFCA size data there could be a 24% reduction in the number of female crabs that will be landed in the South West when the increase MCRS is introduced. This equates to an overall reduction of approximately 14% of all crab landings in the South West in the first year after the change. Despite the short-term decrease in available landings, it is hoped that this measure will bring long-term positive benefits to the crab stock biomass.

Table 3 – Potential economic impact of increasing brown crab MCRS in the South West using proxy size data. (Taken to the nearest whole pound '£').

ICES Area 7e, f, g, h only – all vessels	2023		2024	
Landed value	Brown crab landings value (£)	Minus a 14% reduction (£)	Brown crab landings value (£)	Minus a14% reduction (£)
All 7e, f, g, and h landings	9,139,842	7,860,264	6,841,803	5,883,951
Under 10 m average	20,749	17,844	13,903	11,957
10 m – 11.99 m average	51,190	44,248	49,885	42,901
12 m – 14.99 m average	273,461	235,176	238,329	204,963
Over 15 m average	380,798	327,486	340,982	293,244

MMO is mindful that 2025 has been an extraordinary year due to the recent increased common octopus presence in the Western English Channel. The economic modelling does assume that a similar population and size cohort will be landed.

## 3.3. Legislation and policy considerations

MMO has obligations relating to legislation and policy including, but not limited to:

- Being 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.
- Under the <u>Trade and Cooperation Agreement</u> article 496(3), notifying the EU about new measures which are likely to apply to their vessels. It has been agreed that 45 days' notice should be provided prior to new measures being applied.
- Reviewing the fishery from an environmental, social and economic perspective, in line with its obligations under the Fisheries Act 2020.
- Delivering policies in line with the fisheries objectives as an obligation under the <u>Joint Fisheries Statement</u>. Those most relevant to this fishery are the sustainable, precautionary, ecosystem and equal access objectives.
- Having regard to national and international agreements as outlined in the <u>Joint Fisheries Statement</u>. These include the <u>Marine Strategy Regulations</u> 2010, which require fishery bodies in the UK to take action to achieve or maintain Good Environmental Status (GES) in all UK waters and the <u>UK Marine Strategy</u> which is a key pillar of marine policy in the UK.
  - The harmonisation of crab MCRS in the South West aligns with the sustainable objective to ensure the short term social and economic risks have been balanced with long term health of the marine environment. It provides resilience to coastal communities whilst protecting crab for future fisheries.
  - The harmonisation of crab MCRS in the South West proposal aligns with the ecosystem objective in that any negative impacts on crab is minimised.
  - This measure aligns with the equal access objective in that it ensures fair and equitable access and benefit is not impeded based on any vessels home port and that any decisions are based on the need to protect the stock.
- Delivering in line with <u>MMO strategic goals</u> specifically, goal 6 Assure the sustainable and transparent management of fishing opportunities to achieve a resilient and increasingly viable fishing sector.
- Complying with our public sector equality duty under the <u>Equality Act 2010</u>.
   MMO has considered if people with any protected characteristics are likely to have different needs in relation to the decision made within this document or if the decision is likely to present unequal opportunity, result in discrimination or

fail to foster good relations between people with different or diverse characteristics.

MMO has very limited data on protected characteristics of people who fish in South West crab area. However, MMO does not consider the decisions made will discriminate or disadvantage people with protected characteristics. MMO would welcome any comments or information on this matter.

# 4. Conclusion and next steps

MMO would like to thank everyone involved in the survey, in particular the fisheries stakeholders and the fishers themselves who have dedicated the time to working with MMO.

The decision is to harmonise of the brown crab MCRS in all English waters in the South West (Annex 2, Figure 1). The measure will apply to all vessels (UK and EU) will be implementation via a vessel licence condition.

From 1 February 2026 the brown crab MCRS in the South West will be 160 mm for male brown crab and 150 mm for female brown crab.

Any fisher who is the nominated contact on the domestic fishing vessel licence system will be informed via an email notification when the variation is enacted.

## 5. Contact us

If you have any questions or queries, then please email or call our helpline using the details provided below:

Email: FMP@marinemanagement.org.uk

**MMO** helpline: 0300 123 1032

# Annex 1. Existing MCRS management measures

Table 1. South West crab and lobster existing MCRS management measures.

	est crab and lobster existing it	To the management measures.
Measure	Detail	Change
	UK measure in all waters	
	unless exempted by regional	
<u>Technical</u>	regulation.	More restrictive. An increase for
Conservation -	140mm – male and female	male brown crab to 160 mm and
measures	brown crab.	150 mm for female brown crab.
The Undersized	The coasts of Devon, Cornwall,	
Edible Crabs	and Isle of Scilly-	More restrictive for female brown
Order 2000	160 mm - male brown crab	crab – from 140 mm to 150 mm.
	Within the CIFCA district.	
Cornwall IFCA	160 mm male brown crab	
(CIFCA)	150 mm female brown crab	No change
Devon & Severn	Within the D&SIFCA district	_
<u>IFCA</u>	160 mm male brown crab	
(D&SIFCA)	150 mm female brown crab	No change

## Annex 2. South West brown crab area

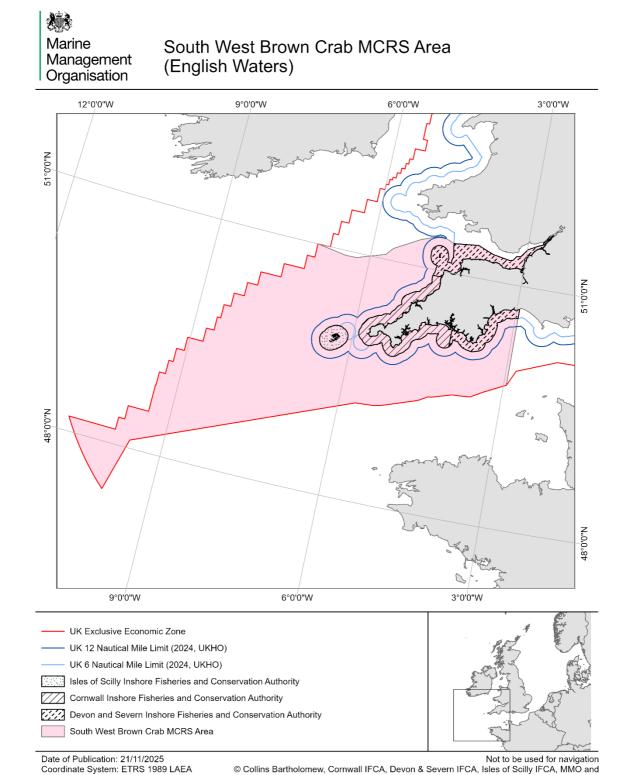


Figure 1. South West brown crab area (shaded pink). The area extends to the area west of 2°.56.78W longitude and south of 52 ° 0 N latitude (map).

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# **Annex 3. Brown crab landing data**

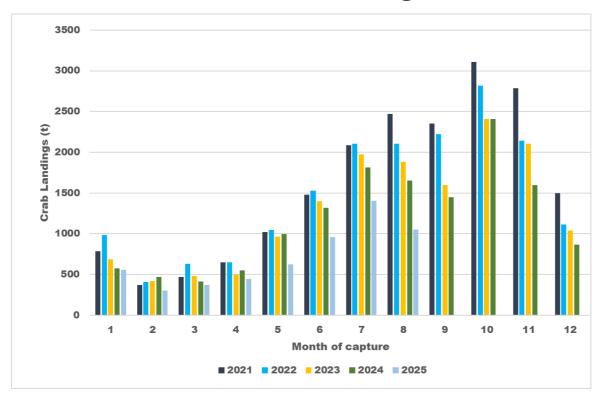


Figure 2. MMO crab landing data from 2021 to August 2025, for all English waters for all UK vessels and all gears.

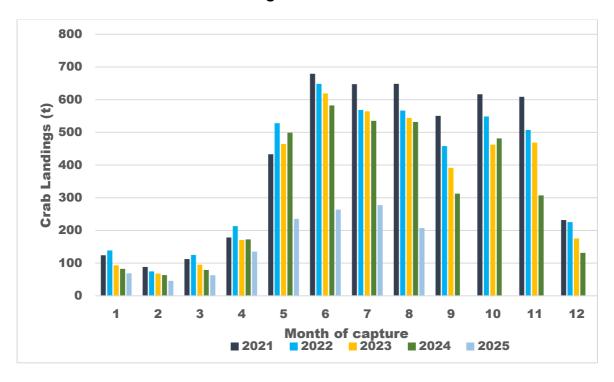


Figure 3. MMO landing data from 2021 to August 2025 from ICES area 7e, 7f, 7g, 7h, and 7j for all UK vessels and all gears.

# Annex 4. Responses to consultation and MMO response for question 13.

Question 13 provided respondents with the opportunity to provide any further comments and was a free text response. To present responses MMO organised responses into themes (Table 2). Please see Table 3 for MMO response to the main themes for this question.

#### Question 13.

We asked: 'Do you have any other comments?'

This question provided an option for free text responses. To present the responses MMO has collated these into themes and summarised comments. Please see table 2 below.

#### You said:

Table 2. Themes and summarised comments received from respondents for question 13.

Theme	Comments
Effort management	<ul> <li>Fishing effort needs to be reduced to 20%.</li> <li>Weather limits days at sea small inshore boats can operate.</li> <li>Brown crab fishing in the South West needs to be managed through a harvest control rule that directly restricts the fishery to allow stocks to rebuild and the fishery to become as productive as it can be in the long term.</li> </ul>
Size limits and biological concerns	<ul> <li>Calls for uniform shellfish size limits across all regions and sexes (for example, one size for brown crab).</li> <li>Further requests to increase MCRS for crab and lobster (for example why not increase crab MCRS for the rest of the Channel to the east; lobster MCRS increase to 90 mm).</li> <li>Further scientific evidence and research is needed into the diversity of crab populations around the country to make future MCRS and effort management decisions.</li> </ul>
Closed seasons and days at sea	Strong support for seasonal closures, especially in winter (November to January), to allow stock recovery and reduce risks (such as accidents and lost gear).

	<ul> <li>12 to 14.99 m boats are already restricted to the number of days at sea by weather and crew shortages.</li> <li>Days at sea is the easiest management tool.</li> <li>Suggestions to restrict to 100 days per year.</li> <li>Some advocate for closures across all species, not just crab.</li> </ul>
Pot limits	<ul> <li>Concern about large vessels with thousands of pots, intensely fishing causing stock depletion.</li> <li>The expansion of pot numbers is seen as unsustainable and harmful to traditional grounds.</li> <li>Introduce pot limits per vessel (for example, "100 pots per metre of vessel length).</li> <li>The less pots and crabs being caught means better prices for what is landed.</li> <li>Concerns about enforcement challenges if pot limits are introduced. Use of Remote Electronic Monitoring (REM) could be a solution.</li> </ul>
Diversification and alternative fisheries	<ul> <li>It should be easier to diversify into other fisheries.</li> <li>Bass licences should be transferable and changeable between rod/line and netting. Tuna licences could be prioritised.</li> <li>If whelk permits are introduced, then give to boats wishing to move from crabbing to reduce pressure on crab stocks.</li> <li>Diversification helps fishers adapt and reduce overfishing.</li> </ul>
Impact of octopus and seals	<ul> <li>Several mention the octopus' invasion and their predation on smaller crab and lobster.</li> <li>One response highlights the exploding seal population as a threat to salmon and other stocks.</li> </ul>
Equity between vessel sizes	<ul> <li>Smaller day boats feel unfairly targeted and highlight their limited fishing days due to weather and crew availability.</li> <li>Emphasis that larger boats fishing in all weathers and all hours of the day are the real issue.</li> <li>Larger boats should be restricted from the inshore waters.</li> <li>Size limit restrictions will not help stocks unless you limit the amount of pots being used.</li> </ul>

Frustration with past management	<ul> <li>Criticism of grant-funded pots causing the increased pot numbers, and the lack of action despite engagement.</li> <li>Calls for urgent, robust, and enforceable management before stock collapse becomes irreversible.</li> <li>Frustration with past decisions made without robust scientific evidence and/or lack of management.</li> <li>Appreciate engagement but action is better.</li> </ul>
Other	<ul> <li>Support for licensing for pot fishing.</li> <li>Allow aggregation then decommissioning the fleet.</li> <li>Ban the use of brown crab for (whelk) bait.</li> <li>A quota would be easier to enforce.</li> </ul>

Table 3. MMO responses to themes raised in question 13.

Theme(s)	MMO response
Effort Management	<ul> <li>Effort management is raised as a medium to long-term goal of the Crab and Lobster FMP.</li> <li>Defra, MMO and stakeholder groups will be developing effort management strategies in the fishery as a priority.</li> </ul>
Lobster MCRS and soft-shell crab being used bait	<ul> <li>Both subjects are raised as short term goals of the Crab and Lobster FMP.</li> <li>Work has been progressed by Defra, and outcomes are hoped to be announced shortly.</li> </ul>
Western Waters Effort	<ul> <li>Western waters effort is a limitation on the number of days each year that vessels 15 m and over can fish for brown crab and spider crab in ICES areas 5, 6 and 7.</li> <li>This is retained EU law and may inform future effort management work in the fishery.</li> </ul>
Pot Limits	<ul> <li>Pot number data is limited and unverified at present.</li> <li>Without verifying the pot numbers creating pot limits could be based on assumption rather than a Catch per Unit Effort (CPUE) calculation.</li> <li>Proposal 4 of the FMP relates to effort management. As part of this objective, it notes that effort limitations could be achieved by capping pot numbers. Pot numbers and</li> </ul>

	subsequent limits will be considered as part of this upcoming work.
Diversification (bass, tuna and vessel licensing)	<ul> <li>One of the bass FMP short-term measures was to review the bass authorisation process. The recommendations that come from the bass authorisation review will be further developed in the medium- and long-term bass FMP work. Progress of the bass FMP can be found in the <a href="Defra FMP">Defra FMP</a> blog.</li> <li>The bluefin tuna (BFT) fishery is an emerging fishery in the South West and the licensing process is an annual allocation that is being developed each year. Further details and guidance of the BFT fishery can be found on the <a href="MMO BFT webpages">MMO BFT webpages</a>.</li> </ul>
Seal predation	<ul> <li>Since 2020 UK fishermen can no longer use the nets man's defence to reduce loss of catches from seal predation.</li> <li>MMO Evidence team have been working on a project investigating seal deterrent devices, the outcome will be published on the <u>Evidence projects registry</u>.</li> <li>Anecdotal information has recorded seal predation in pots for both the bait and the fish captured within.</li> </ul>
Frustration with past management (historic pot funding)	<ul> <li>Replacement pot funding was previously available through the European Fisheries Fund (EMFF).</li> <li>This element was removed from the scheme following concerns and anecdotal intelligence that it was being exploited.</li> <li>To be successful in a grant for replacement pots there were stipulations on sustainability.</li> <li>Replacement pots were subject to an inspection by the MMO Coastal team to verify that the replaced gear had been destroyed. If this was not satisfied, then the payment was not made.</li> <li>As the pots being funded had to be replaced, and evidence of the old being destroyed, there is no evidence to support the suggested increase of pots in the fishery.</li> </ul>

It was noted that in many responses it was requested that new management needs to be quickly implemented and there is need for further management to be introduced in the fishery.