



# Shellfish

Association of Great Britain

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Via email to [info@kentandessex-ifca.gov.uk](mailto:info@kentandessex-ifca.gov.uk)

16th September 2022

Dear Sirs

## **Response to the Cockle Fishery Review**

I am writing on behalf of the Shellfish Association of Great Britain (SAGB). We are the UK industry membership trade association based at Fishmongers' Hall, home of the Worshipful Company of Fishmongers; one of the 12 great livery companies of the City of London. We represent the shellfish industry in Britain which currently accounts for almost half of the value of landings of all fishery products in the UK.

The SAGB would like to make the following comments on the Cockle Fishery review for the Thames Estuary.

It is appropriate that a full review is taking place, however care needs to be taken with any decisions reached.

The SAGB believes that The Thames Estuary Cockle Fishery Order of 1994, granted for 30 years, has been, with the Bury Inlet and Poole Harbour Fisheries, one of the most successful examples of any of the Cockle Fishery's in the UK and Europe. The fact that it has achieved MSC certification is testament to this and a major first for a hydraulic dredge cockle fishery.

This clearly demonstrates that the management has been effective in creating a well-managed and sustainable fishery since the inception of the regulating order and to date.

Limiting Access to a fishery does have enormous benefit in achieving strong management and sustainability, however it does also have drawbacks as well by limiting entrants into the fishery.

We see that you have plans for a small-scale fishery that must be commended allowing more fishers to pursue their aims, yet at the same time protecting the main fishery.

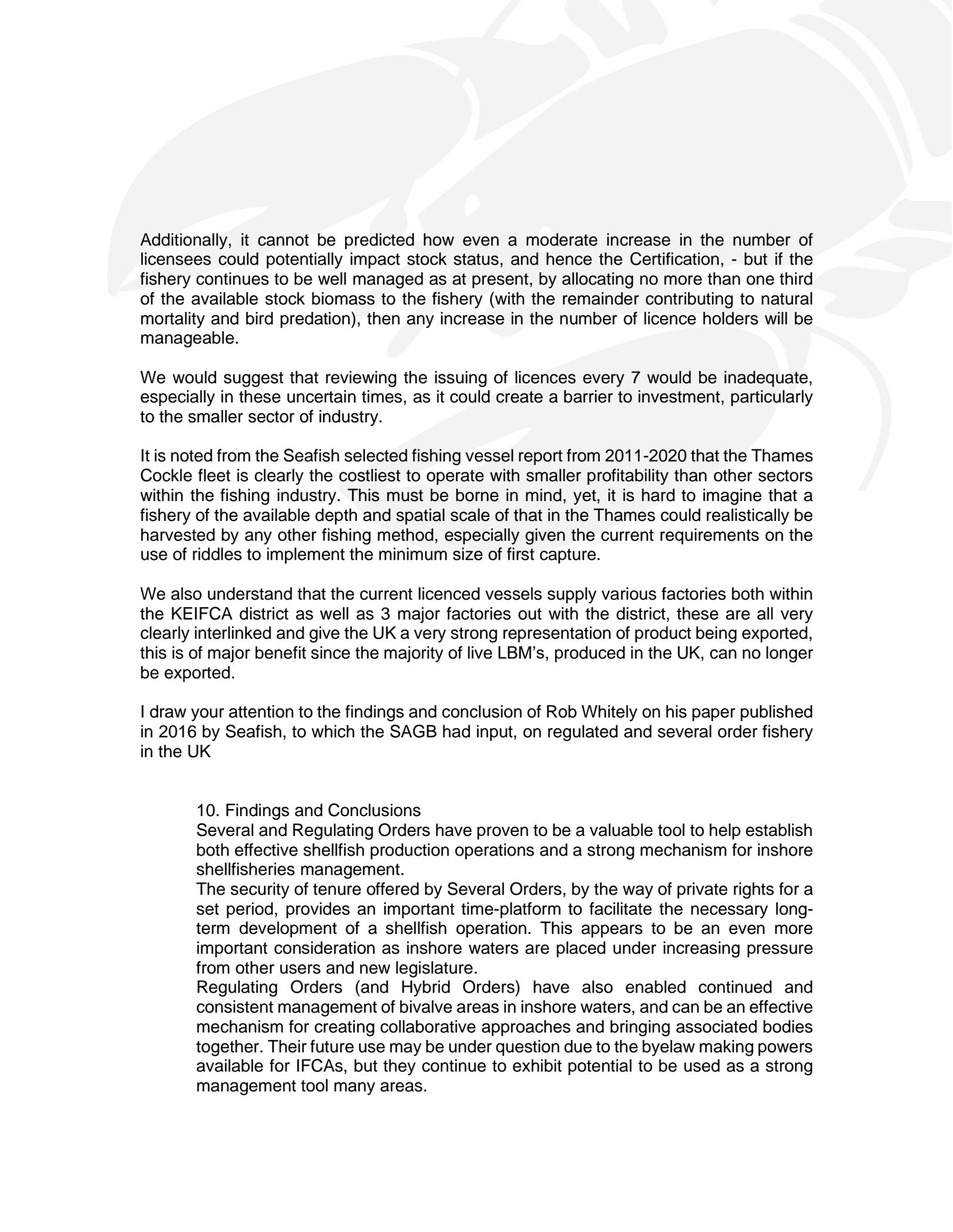
It is important to recognise that Certification rests on the current licensing and stock management arrangements, and that any changes to these may have implications for continuation of the accreditation.

### [The Shellfish Association of Great Britain](http://www.shellfish.org.uk)

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Additionally, it cannot be predicted how even a moderate increase in the number of licensees could potentially impact stock status, and hence the Certification, - but if the fishery continues to be well managed as at present, by allocating no more than one third of the available stock biomass to the fishery (with the remainder contributing to natural mortality and bird predation), then any increase in the number of licence holders will be manageable.

We would suggest that reviewing the issuing of licences every 7 would be inadequate, especially in these uncertain times, as it could create a barrier to investment, particularly to the smaller sector of industry.

It is noted from the Seafish selected fishing vessel report from 2011-2020 that the Thames Cockle fleet is clearly the costliest to operate with smaller profitability than other sectors within the fishing industry. This must be borne in mind, yet, it is hard to imagine that a fishery of the available depth and spatial scale of that in the Thames could realistically be harvested by any other fishing method, especially given the current requirements on the use of riddles to implement the minimum size of first capture.

We also understand that the current licenced vessels supply various factories both within the KEIFCA district as well as 3 major factories out with the district, these are all very clearly interlinked and give the UK a very strong representation of product being exported, this is of major benefit since the majority of live LBM's, produced in the UK, can no longer be exported.

I draw your attention to the findings and conclusion of Rob Whitely on his paper published in 2016 by Seafish, to which the SAGB had input, on regulated and several order fishery in the UK

#### 10. Findings and Conclusions

Several and Regulating Orders have proven to be a valuable tool to help establish both effective shellfish production operations and a strong mechanism for inshore shellfisheries management.

The security of tenure offered by Several Orders, by the way of private rights for a set period, provides an important time-platform to facilitate the necessary long-term development of a shellfish operation. This appears to be an even more important consideration as inshore waters are placed under increasing pressure from other users and new legislature.

Regulating Orders (and Hybrid Orders) have also enabled continued and consistent management of bivalve areas in inshore waters, and can be an effective mechanism for creating collaborative approaches and bringing associated bodies together. Their future use may be under question due to the byelaw making powers available for IFCAs, but they continue to exhibit potential to be used as a strong management tool many areas.

For any future Order to succeed (whether it is a planned, existing, or up for renewal), early and extensive consultation with associated stakeholders is critical. Maximising early engagement and encouraging dialogue should help shape the Order and minimise and/or mitigate any objections or potential issues and uncertainty at the time of formal consultation. This also should result in a more efficient procedures and ultimately greater management effectiveness once an Order is in place and operational.

The application and renewal procedure for Several and Regulating Orders should be made as efficient as possible to encourage their potential use; with active systems in place to inform and support the operators. Further, suggestions made by the SAGB regarding a wider development plan for aquaculture would also create a more strategic approach to identifying potential sites.

Improving the annual returns and storage procedures for Several and Regulating Orders would also allow their contribution to be quantified in terms of UK shellfish production.

There is little doubt that Orders could be made more 'user-friendly', and in doing so their inclusion and use in planning, managing and increasing shellfish production across England, Wales and Scotland could be harnessed more effectively - whether this be through individual sites/holders, or via large-scale Orders encompassing expansive areas of the British coastline. It may be appropriate to build on the significant expertise, influence on development decisions and to raise the profile of shellfish aquaculture development within regional management organisations such as IFCA's.

The SAGB believes that Several and Regulating Orders may well be seen by some as legacy legislature, complex and under-utilised, but they are all we have and they can work, as clearly demonstrated with The Thames Estuary Cockle Fishery Order of 1994!

It is often the tools we already possess that have the potential to be used the most effectively...perhaps all they need is sharpening in order to be wielded with more conviction and precision?

I hope and trust these comments are helpful in your decision making process.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'David L Jarrad', with a long horizontal line extending to the right.

David L Jarrad  
CEO