

## **Consultation on a Proposal to Increase the Minimum Conservation Reference Size for North Irish Sea Razor Clam**

### **Purpose of this consultation**

The purpose of this consultation is to seek the views of those with an interest in the Irish razor clam fishery in the North Irish Sea regarding an industry-led proposal to increase the minimum conservation reference size (MnCRS) for that stock from 100mm to 125mm. The information received during the consultation will inform policy decisions on the proposed measure and will assist in evaluating possible impacts it could have.

If you wish to respond to this consultation, you are invited to complete this consultation submission document. **Please read the entire document and provide answers to the consultation questions in sections 1-3, 6, and 9-11.**

You are requested to submit the completed consultation submission document using one of the following methods:

- by email to: [inshore@agriculture.gov.ie](mailto:inshore@agriculture.gov.ie) (with the subject line “NIS Razor Clam”)
- by post to: North Irish Sea Razor Clam Consultation  
Marine Programmes Division  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty, Co. Cork P85 TX47

**Please note that the consultation will last for six weeks, commencing on Monday, 22 January 2018, with a deadline of 5pm on Friday, 9 February 2018 for submissions.**

### **FREEDOM OF INFORMATION & DATA PROTECTION**

All submissions are subject to the Freedom of Information Acts and/or the European Communities (Access to Information on the Environment) Regulations and may also be published on the Department’s website (excluding certain personal information). If any of the detail you have provided is sensitive on the basis that it is personal, confidential, or commercially confidential, please identify it here and give clear reasons why you think it should not be released. The Department will, where possible, consult with you about any information which you have identified as sensitive information before making a decision in response to a request for release under the Freedom of Information Acts.

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### CONSULTATION SUBMISSION DOCUMENT

*Please read the consultation document in full before responding to this questionnaire.*

**1. I am making this submission:**

- |   |   |
|---|---|
| <input type="checkbox"/> On my own behalf | <input type="checkbox"/> On behalf of an organisation/group |
|---|---|

**2. I am a:**

- |  |   |
|--|---|
| <input type="checkbox"/> Fisherman                               | <input type="checkbox"/> Shellfish buyer / processor            |
| <input type="checkbox"/> Representative of fishermen association | <input type="checkbox"/> Representative of an environmental NGO |
| <input type="checkbox"/> Representative of state body            | <input type="checkbox"/> Scientist / technical expert           |
| <input type="checkbox"/> Political representative                | <input type="checkbox"/> Representative of trade association    |
| <input type="checkbox"/> General public                          | <input type="checkbox"/> Other                                  |

**3. My contact information is:**

Name	
Address	
Phone number (optional)	
Email address (optional)	

**If you are a fisherman:**

Sea-fishing boat name	
Sea-fishing boat registration	
Home port	

**4. Razor clam fishing in Ireland**

Fisheries for razor clam (*Ensis siliqua* and *Ensis arcuatus*) in the waters of the State are largely based on the east coast, with major fisheries located in the North Irish Sea (Howth to Dundalk Bay) and off the Wexford coast (Rosslare and Cahore). There are additional smaller fisheries located around the coast at locations such as the Inishkea Islands. Razor clams can only be taken from areas designated as classified production areas by the Sea-Fisheries Protection Authority (SFPA). Razor clam fishing occurs during most of the year, however the industry typically pause during spawning season

in early summer. In 2015, landings of razor clams into Ireland amounted to 840 tonnes and were valued at more than €4.77 million.

Weekly catch limits apply to sea-fishing boats operating in the North Irish Sea and Wexford razor clam fisheries. Voluntary catch limits are in place for smaller Irish razor clam fisheries, with annual TAC (total allowable catch) limits for particular stocks. **The EU minimum conservation reference size (MnCRS) of 100mm (Council Regulation (EC) No 850/98) applies to landings of razor clams, but a higher MnCRS of 130mm applies to boats operating in the Wexford fishery (Fisheries Natura Declaration No. 3 of 2014 (Wexford Razor Clam Fishery)).** All sea-fishing boats fishing for razor clams within the internal waters or territorial seas of the State are required to report VMS (vessel monitoring system) data.

## 5. Razor clam fishing in the North Irish Sea

The North Irish Sea (NIS) razor clam fishery (*Ensis siliqua*) has expanded significantly in the period since 2011, especially in the last five years, and the fishery continues to experience high fishing effort. More than 60 sea-fishing boats fished in 2016 and 2017. This fishery is regulated using a weekly catch limit of 600kgs per boat.<sup>1</sup> Fishing is also prohibited on Sunday. There is no annual TAC in place for the fishery, but the industry pauses fishing voluntarily during the stock's spawning season, which is likely to peak in June.

## 6. Do you fish for razor clam?

Yes                       No

**If yes, in what area do you fish for razor clam?**

North Irish Sea             Wexford Coast (Rosslare and Cahore)

Other (Please describe in box below)

## 7. Proposal to increase MnCRS

The proposal to increase the MnCRS for the NIS razor clam fishery was put forward by the North Irish Sea Razor Fishermen's Association, which represents about 30 of the estimated 70 sea-fishing boats active in the fishery in recent years. The proposal would

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<sup>1</sup> Razor Clam (Conservation of Stocks) (North Irish Sea) Regulations 2015 (S.I. No. 207 of 2015) and Razor Clam (Conservation of Stocks) (North Irish Sea) (Amendment) Regulations 2015 (S.I. No. 588 of 2015)

raise the MnCRS for razor clam in the NIS fishery above the current 100mm level to 125mm.

The MnCRS proposal was developed by local industry members in response to concerns that numbers of NIS razor clams just above the current MnCRS are being landed and that this could be negatively affecting conservation of the stock. Industry members proposed increasing the MnCRS as a way of protecting these razor clams and giving them more time to spawn and contribute to the stock's biomass.

The proposal was brought to the National Inshore Fisheries Forum (NIFF) by the North East Regional Inshore Fisheries Forum (NE RIFF). The NE RIFF has said it fully supports the proposal and believes that an increase in the MnCRS may help the fishery to become sustainable in the long term, increase the value of landings and allow higher recruitment and spawning.

The proposal was recommended to the Minister by the NIFF at its meeting in September 2017. Accordingly, the Minister is now considering the introduction of the increase. The information received during the public consultation will inform policy decisions on the proposed measure and will assist in evaluating possible impacts it could have.

## **8. Status of the North Irish Sea razor clam stock**

The Marine Institute (MI) has previously advised that razor clam stocks in the Irish Sea are over-exploited, with indicators (daily landings per sea-fishing boat, catch per hour) declining significantly and persistently over time. Following a June 2017 survey of the NIS razor clam stock, the MI has advised:

- The stock is increasingly growth overfished.
- Economically, the fishery is at increased risk from reduced availability of high-value grades and from overall reduction in catch per hour and net value of catch per hour. Landings and fishing effort, particularly the number of sea-fishing boats, continues to increase.
- The existing weekly catch limit has not stabilised landings or effort.
- These trends should be reversed by reducing the rate of fishing to enable growth of clams to keep pace with fishery removals.
- Total annual fishing effort and/or landings should be reduced.

Advising on the MnCRS proposal, the MI said that increasing the MnCRS for NIS razor clam to 125mm may have positive effects on the stock's future yield and egg production, depending on discard mortality and depending on the degree to which it represents a change in selection (high grading) in the fishery. However, the MI also noted that an increase in the MnCRS, combined with the continued reduction in size and density of the razor clams (which is reflected in lower catch rates), will increase dredging effort under existing catch limit arrangements. This may have negative effects on recruitment of razor clams and on seafloor integrity. It also will increase the costs of fishing.

**9. Should the current minimum conservation reference size (MnCRS) of 100mm be retained for the NIS razor clam fishery or should the MnCRS be increased to 125mm?**

Retaining the current MnCRS of 100mm for the NIS razor clam fishery would maintain the *status quo*.

Pros	Cons
Fishing practices would remain unchanged.	No increase to yield and egg production in the fishery.
	Overfishing of stock likely to continue.

Increasing the MnCRS for the NIS razor clam fishery to 125mm would mean no razor clam less than 125mm could be landed from that fishery. Fishermen would be obliged to comply with this standard.

Pros	Cons
The MnCRS increase will have positive effects on yield and egg production in the fishery, depending on discard mortality and changes in high grading in the fishery.	The MnCRS increase will lead to an increase in the number of fished razor clams being discarded.
The MnCRS increase will reduce the risk of stock overexploitation.	The MnCRS increase will not reduce landings, as each sea-fishing boat can still take razor clams up to the weekly catch limit.
	The MnCRS increase, along with continued decline in the size and density of razor clams, will result in higher dredging effort, which increases the costs of fishing and may negatively effect razor clam recruitment and seafloor integrity.

**Please indicate which of the two options you recommend (pick one):**

- Increase the MnCRS for the NIS razor clam fishery from 100mm to 125mm
- Retain the current 100mm MnCRS for the NIS razor clam fishery

Please give your reasons why:

**10. If the increased MnCRS is implemented, should it be applied within the same “specified zone” as other management measures for the NIS razor clam fishery?**

The MnCRS proposal received from the NE RIFF recommends the increased MnCRS for the NIS razor clam stock be applied to sea-fishing boats fishing in the North Irish Sea, in an inshore area extending from Howth to Dundalk Bay.

The Razor Clam (Conservation of Stocks) (North Irish Sea) Regulations 2015 (S.I. No. 207 of 2015) defined a “specified zone” for the fishery that includes the waters of the State west of longitude 005°59.2000’W, running from Cranfield Point to Bray Head. The specific definition of the zone given in the SI is as follows:

*“specified zone” means the internal waters or territorial seas west of an imaginary line drawn from:*

*Latitude 54°01.3617’N, Longitude 006°03.7762’W through*

*Latitude 54°00.0000’N, Longitude 005°59.2000’W through*

*Latitude 53°11.2881’N, Longitude 005°59.2000’W to*

*Latitude 53°11.2881’N, Longitude 006°04.5611’W.*

**If the increased MnCRS is implemented, should it be applied within the same “specified zone”?**

Yes

No

Please give your reasons why:

**11. Would you recommend that different or additional measures are needed for the NIS razor clam fishery? If so, please describe what other measure(s) you recommend. Please give reasons for your proposal(s).**

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