



BY EMAIL ONLY

28 October 2020

Dear stakeholder,

Call for evidence on the MMO draft assessment of fishing impacts and potential management options for the Dogger Bank Special Area of Conservation (SAC)

The Marine Management Organisation (MMO) is seeking additional evidence and views on our draft assessment of the impacts of fishing on the conservation objectives of the Dogger Bank SAC, and potential management options.

This letter provides a background to the SAC and the role of the MMO, a brief summary of known fishing activity in the site, a range of potential management options being considered, supplementary information, and information on how to respond to the call for evidence and what to expect next.

Background

Dogger Bank SAC was formally designated in September 2017¹. The site has one designated feature:

- Sandbanks which are slightly covered by seawater all the time

A map showing the Dogger Bank SAC and the location of the habitat types (known as 'sub-features') making up the sandbank is provided at the end of this letter.

The conservation objectives set for the Dogger Bank SAC are set out on the Joint Nature Conservation Committee (JNCC) Site Information Centre² as:

For the feature to be in favourable condition thus ensuring site integrity in the long term and contribution to favourable conservation status of Annex I sandbanks which are slightly

¹ Regulations 11, 16 and 17 of the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007: www.legislation.gov.uk/uksi/2007/1842/contents/made.

² Dogger Bank Site Information Centre: <https://jncc.gov.uk/our-work/dogger-bank-mpa/>



covered by seawater all the time. This contribution would be achieved by maintaining or restoring, subject to natural change:

- The extent and distribution of the qualifying habitat in the site;
- The structure and function of the qualifying habitat in the site; and
- The supporting processes on which the qualifying habitat relies.

The Joint Nature Conservation Committee (JNCC) advises a combination of 'maintain' and 'restore' targets for different attributes of the sandbanks which are slightly covered by seawater all the time feature³.

Maritime boundaries

The Dogger Bank SAC lies in English offshore (from 12-200 nm) waters and is adjacent to the median line with Dutch waters.

Summary of fishing activity within the site

Initial analysis of vessel monitoring system (VMS) information indicates that the main fishing activities within the Dogger Bank SAC are from bottom towed gear, including trawling and seining vessels. There has been little previous evidence of scallop dredging occurring within the site however, there has been a rapid increase in this activity since mid-2020. Other fishing activities occurring, albeit less frequently, include fixed gill nets. Vessels that fish within the SAC include those from the UK, Denmark, the Netherlands, Belgium, Sweden, France, Germany, Ireland, and Norway.

Further analysis of fishing activity within the site is available in the draft Dogger Bank SAC MMO Fisheries Assessment.

Draft MMO assessment

The draft MMO assessment of fishing impacts at this site, taking into account the current unfavourable status⁴ of the site's feature, advice from JNCC and best available evidence, has determined that the 'sandbanks that are slightly covered by seawater all the time' feature is sensitive to impacts from the semi-pelagic and demersal trawl, demersal seine and dredging activities at the levels taking place.

It is therefore MMO's current opinion that the conservation objectives for this feature may not be achieved due to its vulnerability to these activities.

Management of fishing activity may therefore be required to support the achievement of the conservation objectives for the SAC.

³ JNCC Supplementary Advice on Conservation Objectives: <https://data.jncc.gov.uk/data/26659f8d-271e-403d-8a6b-300defcabcb1/DoggerBank-3-SACO-v1.0.pdf>

⁴

www.noordzeeloket.nl/publish/pages/126227/north_sea_rac_agreement_on_fisheries_management_dogger_bank.pdf



The purpose of this call for evidence is to seek additional evidence and views to inform the draft assessment and the associated management options.

Management options

The focus of this call for evidence is ensuring that the draft assessments are based on the best available evidence. The introduction of any management measures will be subject to a separate process, including appropriate levels of consultation.

Any management measures will be non-discriminatory, applying equally to vessels from the UK and from any other country with fishing access rights.

We are currently considering the following potential management options to further the site's conservation objectives:

Option 1: No fisheries restrictions. Introduce a monitoring and control plan within the site.

Option 2: Reduce/limit pressures. Due to the potential impacts of demersal and semi-pelagic trawls, demersal seines and dredges on the features of the site, management would be introduced to reduce the risk of the conservation objectives not being achieved. This may be through a zoned management approach and/or limiting the activity/intensity of these activity types.

Option 3: Remove/avoid pressures (whole site prohibition). Demersal and semi-pelagic trawls, demersal seines and dredges will be prohibited in all areas of the site.

At this time, we do not believe that management option 1 is sufficient to protect Dogger Bank SAC due to the unfavourable status of the site and the likely adverse effects to site integrity from fishing with gears that are towed over the seabed.

Questions to consider

Please provide us with any information you feel could be relevant to inform our assessment and decision for management at this site. In particular we are interested in understanding the following:

- Do you have any additional information about the location, condition or sensitivity of the designated feature and/or its sub-features?
- Do you have information about the level or nature of fishing activity within the site?
 - What fishing gears are commonly used?
 - How regularly are each of these gears used?
 - What is the approximate size of each of the gears being used?
 - What species do each of these gears target?
 - What species are caught as bycatch by each of these gears?
 - What are the other environmental effects of these gears?
- How would each of the proposed management options affect you? (Please provide evidence of this impact if possible)
- What other effects will each of the proposed management options have?



- With regard to management option 2, to achieve the conservation objectives of the site:
 - What proportion and/or which parts of the site should be subject to a prohibition of demersal and semi-pelagic trawls, demersal seines and dredges? Where possible, please provide the evidence and/or rationale for your answer.
 - By what proportion do you think demersal and semi-pelagic trawls, demersal seines and dredges should be reduced? Where possible, please provide the evidence and/or the rationale for your answer.

How we will consider new evidence

We always seek to use the best available evidence to inform our decisions.

The purpose of this call for evidence is to provide an opportunity for stakeholders to provide additional evidence to inform our assessment and, where necessary, development of management measures.

It is important that we understand the strengths and limitations of any evidence in order to understand how it can contribute to our decision making.

Any evidence received will therefore be assessed in accordance with the MMO evidence quality assurance process⁵.

How to respond

Please respond no later than **15 December 2020**. You can respond by completing our online survey by visiting: <https://consult.defra.gov.uk/mmo/call-for-evidence-mmo-mpa-assessments>

If you are not able to access the above survey, you can respond via the details below. Due to the current COVID-19 situation we are asking all stakeholders to use email rather than post if possible.

By email: conservation@marinemanagement.org.uk

By telephone: 0300 123 1032

In writing:
Dogger Bank SAC call for evidence
Marine Conservation Team
Marine Management Organisation
Lancaster House
Newcastle upon Tyne
NE4 7YH

5

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921894/qa-evidenceprocess002.pdf



Next steps

We will use the information received during this call for evidence, alongside other information (including analysis of academic literature, fishing logbooks, vessel monitoring system data), to update and finalise our assessment and develop formal fisheries management proposals for this site.

If we believe that management measures are required, we will identify the most appropriate way to implement these and take steps, including further consultation, accordingly.

More information on the MMO byelaw making process can be found at www.gov.uk/guidance/marine-conservation-byelaws

If you wish to be alerted once this consultation is launched, or if you have any further questions or queries, please email conservation@marinemanagement.org.uk or call the MMO helpline on: 0300 123 1032.

Yours faithfully,

MMO Marine Conservation Team

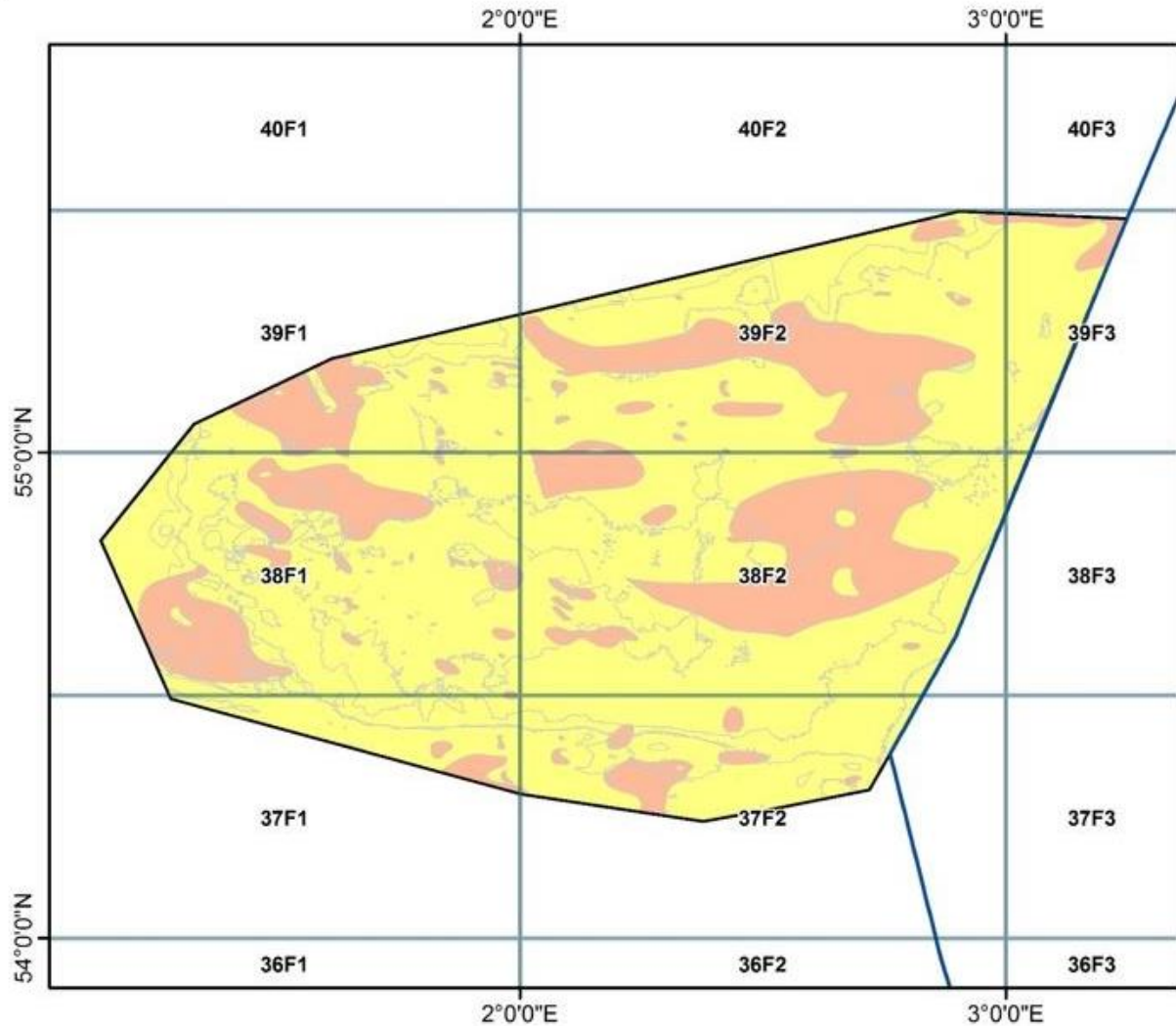




Marine
Management
Organisation

Dogger Bank Special Area of Conservation

Designated features



- UK EEZ
- ICES Statistical Rectangles
- Dogger Bank SAC

Habitat Type

- Subtidal coarse sediment (A5.1) [H1110]
- Subtidal sand (A5.2) [H1110]
- Subtidal mixed sediment (A5.4) [H1110]

Habitat data clipped to site

Date: 27/08/2020
Coordinate System: GCS ETRS 1989
Datum: ETRS 1989
Units: Degree



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