



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 Inner Dowsing, Race Bank and North Ridge 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 Inner Dowsing, Race Bank and North Ridge 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

Inner Dowsing, Race Bank and North Ridge SAC was formally designated as a Site of Community Importance (SCI) in November 2011. Under The Conservation of Offshore Marine Habitats and Species Regulations 2017¹ the status changed to a SAC on 29 September 2017. The site has two designated features:

- Reefs; and
- Sandbanks which are slightly covered by sea water all the time.

A map showing the Inner Dowsing, Race Bank and North Ridge SAC and the location of the features is provided at the end of this letter.

¹ https://www.legislation.gov.uk/ukxi/2017/1013/pdfs/ukxi_20171013_en.pdf



The conservation objectives set for the Inner Dowsing, Race Bank and North Ridge SAC are set out in the Natural England and Joint Nature Conservation Committee (JNCC) conservation advice and are to:

- Restore reef to favourable condition; and
- Restore sandbanks which are covered by sea water all the time to favourable condition.

Maritime boundaries

The Inner Dowsing, Race Bank and North Ridge SAC straddles both the 6 and 12 nautical mile (nm) boundaries, and therefore falls under two different administrative areas: the District of the Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA; 0 – 6 nm) and the area offshore of 6 nm, where MMO leads on the assessment and management of fishing. The assessment is for the portion of the site offshore of 6 nm only. Eastern IFCA will continue to assess and manage fishing activities in the area inshore of 6 nm.

Summary of fishing activity within the site

Initial analysis of vessel monitoring system (VMS) information indicates that fishing activity of vessels over 12 meters, throughout the site is mostly potting (including whelk as well as crab and lobster pots), demersal trawling, dredging and anchored nets/lines are also used in the site. The vast majority of vessels operating within Inner Dowsing, North Ridge and Race Bank SAC are UK vessels. However, there are a small number of French vessels known to fish within the SAC outside of 12nm.

Further analysis of fishing activity within the site is available in the draft Inner Dowsing SAC Marine Management Organisation (MMO) Fisheries Assessment.

Draft MMO assessment

The draft MMO assessment of fishing impacts at this site, taking into account advice from Natural England and JNCC is that there is a pathway for disturbance from bottom-towed gear (demersal trawl, demersal seine and dredging) and the impacts alone may result in adverse effect on site integrity - irrespective of feature condition, level of pressure or background environmental conditions.

It is therefore MMO's current opinion that the conservation objectives for these features 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.



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 trawls, demersal seines, dredges, traps and anchored nets/lines 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 trawls, demersal seines and dredges, traps and anchored nets/lines will be prohibited in all areas of the site.

At this time, we do not believe that management option 1 is sufficient to protect Inner Dowsing, Race Bank and North Ridge SAC due to likely adverse effects to site integrity from fishing with gears that interact with the seabed.

Questions to consider

Please provide us with any information you feel could be relevant to inform our 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 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 trawls, demersal seines, dredges, traps and anchored nets/lines? Where possible, please provide the evidence and/or rationale for your answer.
 - By what proportion do you think demersal trawls, demersal seines, dredges, traps and anchored nets/lines 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 be therefore be assessed in accordance with the MMO evidence quality assurance process².

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:

Inner Dowsing, Race Bank and North Ridge SAC call for evidence

2

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



Marine Conservation Team
Marine Management Organisation
Lancaster House
Newcastle upon Tyne
NE4 7YH

Next steps

We will use the information received during this call for evidence, alongside other information (including analysis of academic literature, fishing logbook, 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,

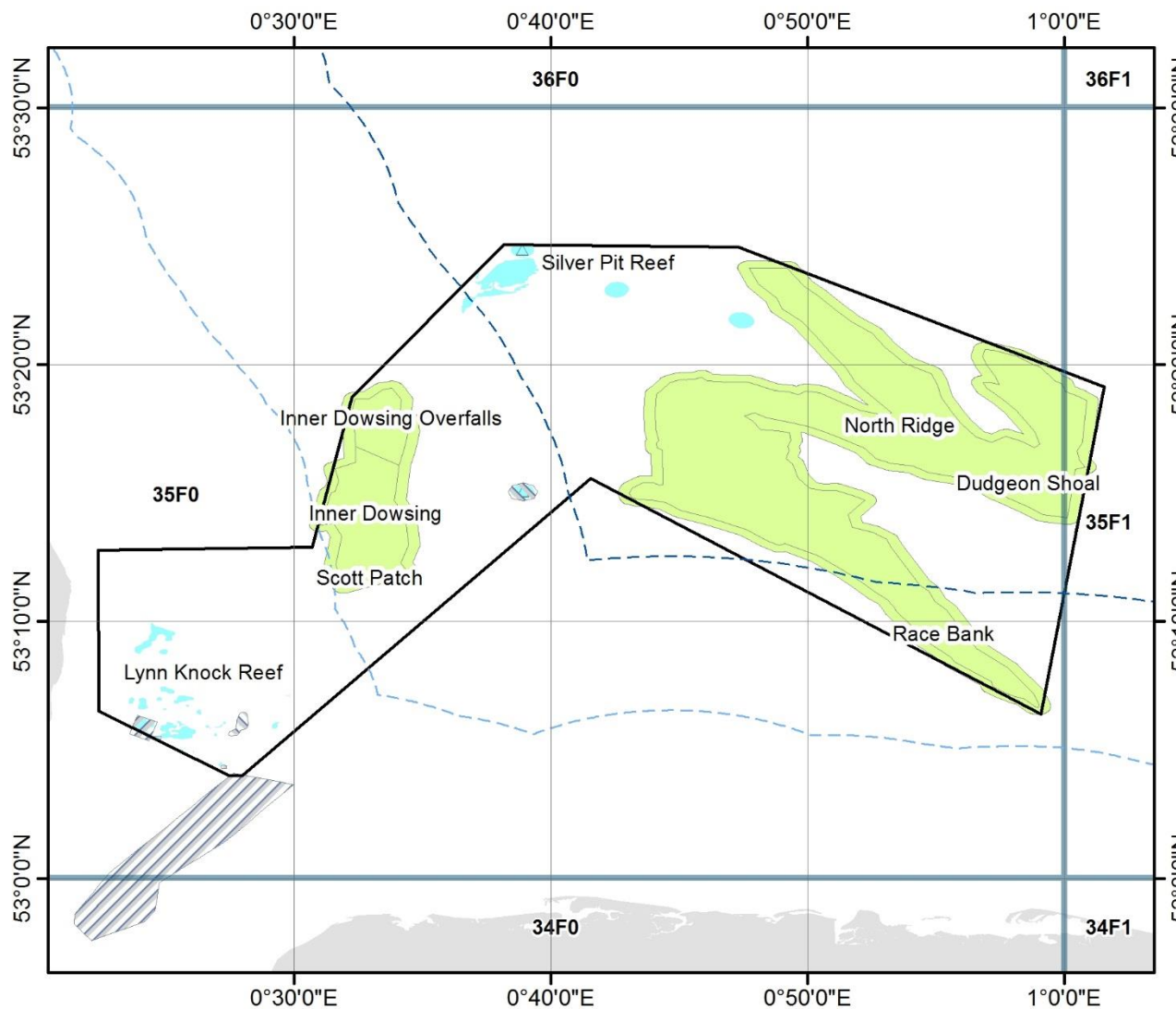
MMO Marine Conservation Team





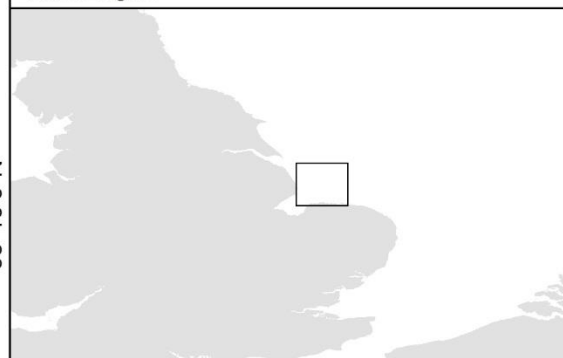
Marine Management Organisation

Inner Dowsing, Race Bank and North Ridge: Special Area of Conservation Designated Features



- 12 Nautical Mile Limit (1983) (UKHO)
- 6 Nautical Mile Limit (1983) (UKHO)
- ICES Statistical Rectangles
- Inner Dowsing Race Bank and North Ridge SAC
- Designated Features Annex 1 Sabellaria Reef
- Area to be managed as Annex 1 Sabellaria Reef
- Annex 1 Sandbank
- MMO and IFCA Byelaws
- MMO Bottom Towed Fishing Gear Byelaw
- Eastern IFCA MPA Byelaw 2018

Date: 26/10/2020
 Coordinate System: GCS ETRS 1989
 Datum: ETRS 1989
 Units: Degree



Not to be used for navigation.
 Contains public sector information licensed under the Open Government Licence v 3.0. © Crown copyright and database right 2020, Ordnance Survey data © Crown copyright and database right 2016, Marine Management Organisation data © Crown copyright and database right 2020, NOAA 2019 data © and SOEST 2019 data, UK Hydrographic Office data © Crown copyright and database right 2020. ICES Statistical Rectangles dataset 2015. ICES, Copenhagen.