



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

The Scallop Fishery in Wales

Consultation
17th July - 25th September 2009

Summary of Responses

October 2009

Introduction

The Welsh Assembly Government (WAG) held a 10 week consultation on 'Proposals for the Scallop Fishery in Wales' from the 17th July 2009 until 25th September 2009.

The Wales Fisheries Strategy was launched in September 2008 and signalled the Minister's intention to develop and manage viable and sustainable fisheries through an ecosystem based approach. The aim of the proposed measures will be a first stage in securing the sustainable management of the fishery as part of a healthy wider marine ecosystem.

Through these proposals the Minister for Rural Affairs is seeking to implement a series of management measures to achieve a viable and sustainable scallop fishery in Wales. In preparing the consultation document account was taken of issues raised by key stakeholders during a series of pre-consultation meetings.

The purpose of the consultation document was to seek views on a proposed Scallop Fishing (Wales) Order 2009 and on proposals for the future management of the scallop fishery.

Responses

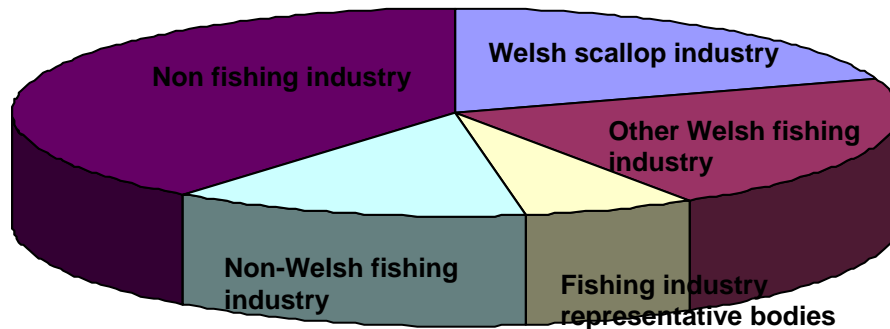
WAG would like to thank all those who responded to the consultation. All responses have been considered and will be fed into decisions on the measures to be implemented.

In total there were 61 responses from a range organisations and individuals. There is a list of respondents at Annex A. The table and chart below show the breakdown of responses.

Table 1: Responses received split by sector

Sector	No. Responses	%
Welsh scallop industry	12	20
Other Welsh fishing industry	13	21
Fishing industry representative bodies	4	7
Non-Welsh fishing industry	8	13
Non fishing industry	24	39
Total	61	

Figure 1; Breakdown of responses



General Comments

Proposals to enhance the sustainable management of the scallop fishery in Welsh waters were generally welcomed. Concerns were often spilt into two distinct camps depending on the particular interest of the respondent. Those involved with the scallop industry, although welcoming moves to protect the fishery for the future, generally felt that the measures, especially proposed closures, went too far and in particular with regards to the Special Areas of Conservation, were not based on scientific evidence. They felt that impacts on these sites were not as great as was generally believed. Those not involved in this fishery also welcomed the measures proposed but felt that the measures did not go far enough, in particular with regard to Wales's marine Natura 2000 sites. Some believed that the document lacked enough detail on the rationale behind the proposals and some were disappointed with the lack of scientific assessment undertaken prior to the consultation being released. Some respondents wanted more verification of statements, such as the importance of this fishery to Wales

"Welcome the stated intension that the introduction of the 2009 Order will be introduced as the first in a series of measures in the coming years". **Countryside Council for Wales (CCW)**

"MCS welcomes the proposal to carry out further research into the fishery in order to make decisions based on sound scientific evidence and apply the precautionary principle wherever this knowledge is lacking. MCS welcome the commitment to an ecosystem-based approach to fisheries management and the acknowledgement that this will have to include measures to restrict effort". **Marine Conservation Society (MCS)**

"The Pembrokeshire Marine SAC Relevant Authorities Group (RAG) warmly welcomes WAG introducing robust new measures

to manage scallop dredging in Welsh waters". **Pembrokeshire Marine SAC Relevant Authorities Group (RAG)**

"Some form of restriction is necessary to preserve our stocks and I wholeheartedly support WAG in any changes they make with the fishermen affected to protect the Welsh scallopers livelihoods"
Individual non-scallop fisherman

"Keen for some measures to be put in place to protect the future of the Welsh scallop fishery and future generations of fishermen, however the balance of the restrictions has to be realistic and workable"
Individual non-scallop fisherman

"We welcome the Welsh Assembly Government's (WAG) intention that Wales' scallop fisheries be managed in order to secure them for the long term, and in consideration of impacts on habitats and species. We believe this is appropriate in the context of WAG's sustainable development duty." **National Trust**

Comments on specific sections of the proposals

For each set of proposals, we have provided a general overview of proposals and examples of responses.

Spatial restrictions:

Consideration of proposals under spatial restrictions was based on a mix of closure of particular areas and limiting access and effort within certain areas.

The areas under consideration for closure were; 0–1 nm all around the Welsh coast; Pen Llyn a'r Sarnau SAC; and Cardigan Bay SAC.

Restricting access in particular areas was proposed as follows; Limiting access in the 1-3 nm areas that are not closed (as detailed above) to vessels which are 10 metres or less overall length, and towing no more than 3 scallop dredges per side.

In the 3 – 12 nm area that is not subject to closure (as detailed above), to further restrict the number of scallop dredges which are allowed to be towed, through one of the following options:

In the 3-6 nm area the maximum number of dredges which can be towed should be 4 per side and in the 6-12 nm zone the restrictions should be a maximum of 7 per side; or

In the 3 – 12 nm zone, to limit the number of scallop dredges permitted to a maximum of 4 per side for vessels that are 10 metres or less overall length, and a maximum of 7 per side for all other vessels.

Questions asked in the consultation document and a cross-section of the responses are given below;

- a) ***Do you agree that the closures proposed above should be introduced within the scallop order?***
- b) ***Do you agree that the closures meet the optimum arrangements for protecting the known locations where key features exist whilst allowing controlled scallop fishing to***

take place. If not, what would you believe to be an optimum and why?

Comments in favour

"We view the proposal for a 0-1nm exclusion zone, together with a three dredges per side restriction for vessels 10m or less in the 1-3nm zone, as a positive move – both in terms of protecting sensitive inshore habitats and to safeguard other fishing interests, particularly those using static gear". **WWF Cymru**

"Inshore waters are of particular importance to the protected bottlenose dolphin population, both within and beyond the borders of the County's two SACs. The inshore waters are important to static gear and recreational fishermen". **B Morgan, Ceredigion County Council**

"Agree in principle with the proposals made in the document, other than closing the whole of the Cardigan Bay SAC because key features still exist despite 3 decades of scallop fishing and this closure would have an enormous detrimental effect on the Welsh inshore fleet". **Individual Scallop Fishermen**

Comments against

"If the Cardigan SAC is closed then this will finish the scallop fishery in Wales" **Individual Scallop Fishermen**

"Complete closure of these areas could force local Welsh boats to disengage from the fishery altogether. This would be due to a lack of profitable fishing grounds available to fish following the proposed closures, or would force the remaining boats to fish further afield, in harsh weather conditions away from the shelter of the shore increasing danger and increasing the danger may possibly lead to more accidents or even fatalities". **Individual Scallop Fishermen**

"We do not believe that any of the areas proposed should be closed to scalloping. It would be far more prudent to identify key areas where scallops have been traditionally fished and work out from there. We are confident that this will reveal huge connecting areas of sea which could be used as a chain of 'scallop-dredge free' areas" **Individual Scallop Fishermen**

"Disappointed that the Carmarthen Bay & Estuaries EMS and Pembrokeshire Marine SAC has not been included in the list of SACs from which it is proposed that scallop dredging would be prohibited completely, or at least pending Habitats Regulations Assessment". **Carmarthen Bay and Estuaries European Site Relevant Authorities Group**

"UK-wide approach to managing scalloping is needed. As such, we support the work that is being carried out by the UK National Scallop Development Group to secure a sustainable future for the scallop sector that balances the need for environmental protection and profitable fishing operations" **WWF Cymru**

“No meaningful way of enforcing any zones, which results in frequent infractions by trawlers all seeking to pursue this unsustainable way of gathering scallops”. **Individual non-fisherman**

“I believe that before such issues as vessel size, horse power, dredge size and effort restrictions are discussed an appropriate impact assessment should be made so that areas that might be able to support a sustainable dredged scallop fishery, without threatening other important ecosystems and fisheries, can be identified”. **Individual non-fisherman**

“Reducing from 8 dredges per side to 7 per side will obviously affect profitability, those two dredges would have paid the wages of 2 crewmen”. **Individual Scallop Fishermen**

“Restrictions should be increased in the 6-12nm zone as this is where most of the activity occurred last season”. **Individual Scallop Fishermen**

“Would not support the closures of the SACs in total as feel that this would increase effort in area’s outside the SAC”. **South West and Wales Fishing Communities Ltd**

c) What benefits or costs do you think these proposals will bring?

“Immeasurable benefits to the long-term viability of charter angling vessels of Aberystwyth and Aberdyfi”. **Charter Angling Boat Skipper**

“As well as benefiting the conservation interest of the sites, there would also be benefits to static gear fishermen and recreational anglers. The major cost would be to those local individuals reliant on scallop fishing in the areas proposed for closure”. **E Morgan, Ceredigion County Council**

“There may be more value to be gained by excluding scallop dredging from the proposed areas, allowing potting, sea angling and diving to thrive and moving to other, more sustainable, means of scallop exploitation and production”. **Individual non-scallop Fishermen**

“Closure of the SACs would bring the benefit of protection of designated and other species and habitats within them. Creation of a 1nm limit may have some very limited benefit in the same terms but would fail to prevent continued damage beyond this. Establishment of a 12nm limit, or less optimally, a 6nm limit would have significantly increased environmental benefits and enhance the future viability of Cardigan Bay” **Friends of Cardigan Bay, Whale and Dolphin Conservation Society, Save our Seas, Cardigan Bay marine Wildlife Centre, Pembrokeshire Bird Group.**

“The costs to the fishery would be the loss of access would lead to displacement of effort to other areas.” **Clyde Fishermen’s Association**

“The cost of closing the SAC means small Welsh family businesses driven to bankruptcy and the socio economics will have far reaching effects”. **Individual Scallop Fishermen**

“The main cost will be the destruction of the Welsh scalloping fleet, who are ill equipped to go further afield”. **Llyn Fishermen’s Association**

“They will bring few benefits simply because they are not based on sound reasoning. Cost will be substantially increased if they are to be policed effectively as the areas are huge and the industry has a history of breaching regulation”. **Individual non-fishermen**

“Minor short term costs to Welsh fishing industry but potential long term benefit from enhancing scallop population stocks and providing opportunity for introduction of non-destructive catching methods” **Individual non-fishermen**

Vessel restrictions

To seek to reduce intensive effort from larger scalloping vessels and to achieve parity with the restrictions based on beam trawling within 12nm the proposal was out forward to limit the maximum vessel power to 300 hp (221 kW) within 0-12 nm zone

- d) Do you agree that the above restrictions, which will limit effort from larger scallop vessels and achieve parity with the restrictions placed on beam trawling in 0-12nm, should be introduced?**
- e) If you do not agree, what would you consider an effective limit to be and why?**

Comments in favour

“Agree with vessel power restrictions of 300hp in 1-12nm zone and less than 300hp inside 1 nm zone” **Individual non-scallop fishermen**

“Restrict the size of vessel that is allowed to fish for Scallops within three miles of the shore to less than 10 metres and have a maximum of 150 hp (111.94 kW)” **Individual non-scallop fishermen**

“Measures to reduce horse-power and number of dredges must be implemented”. **Individual scallop fishermen**

“One of the best options to reduce fishing effort in Welsh waters” **Individual scallop fishermen**

“There is little doubt that this restriction will reduce impact on the grounds”. **Manx Fish Producers Organisation Limited**

“Welcome this proposal however consider it also necessary to restrict the total number of vessels”. **Countryside Council for Wales (CCW)**

“If scallop dredging continues the proposal to limit maximum vessel power to 300 hp (221kW) is supported. Reduction in vessel power needs to be allied to appropriate spatial restriction pending full sensitivity analyses, and to restrictive permitting”. **Friends of Cardigan Bay, Whale and Dolphin Conservation Society, Save our Seas, Cardigan Bay marine Wildlife Centre, Pembrokeshire Bird Group.**

Comments against

“Strongly disagree with vessel restriction proposals. Feels that WAG are proposing a very discriminatory measure which will affect almost all non-Welsh vessels who traditionally fish the area on a regular basis, and have done so for decades” **Individual Non-Welsh Scallop Fishermen**

“The controlling factor for the number of dredges fished by a vessel is not predominantly horse power; it is overall size of the vessel that matters” **Individual non-scallop fishermen**

“There is no justification for this and it cannot be supported” **The Scallop Association**

f) What benefits or costs do you think this measure will bring?

“Costs to the fishery would be through effort displacement”. **Clyde Fishermen’s Association**

“The benefits to the fishery would be that reducing access to small vessels only would give the seabed a chance to recover from the damage caused by larger vessels”. **Individual non-fishermen**

“Limiting the vessel power only makes it a limited fishery for a few. The costs to ourselves is probably 25% of our annual turnover” **Saltire Seafoods**

“The benefits to the very few Welsh scallop vessels, none of whom will be affected by any HP limit will be enormous. To everyone else who is excluded because of the HP limit proposals, the effects will be absolutely devastating, and may well spell the end for many businesses, possibly resulting in huge job losses both afloat and ashore in many rural communities”. **Individual non-Welsh scallop fisherman**

Technical and Gear restrictions

The introduction of several further technical measures regarding the design of dredges used in the fishery were proposed including; reduce the number of teeth allowed to 8 (from 9 currently); a Maximum length of 110mm; Tooth width defined as 12mm; increase the belly rings from 75mm to 85mm; a maximum tow bar diameter of 150mm; consideration of maximum dredge weight and the disallowing for vessels to use their dredges as anchors.

g) Do you agree with the gear restrictions proposed above?

h) If you do not agree, what do you believe the maximum gear settings to be and why?

Comments in favour

“Agree with proposals however there should be a transition period for people to use up there existing stock” **Individual scallop fisherman**

“Any measures to reduce weight and intrusiveness of the gear into the seabed is welcomed”. **Countryside Council for Wales (CCW)**

“Our research has shown that the principal advantage to be gained from improving the selectivity of scallop dredges has been the reduction in stress on the undersized scallops due to the selection of small scallops on the seabed and not on the deck of the boat”. **Seafish**

“I am supportive of the gear restrictions, which will reduce impact of fisheries on ecosystem and provide extra selectivity in relation to the target species”. **Individual non-scallop fisherman**

Comments against

“These proposals would not achieve their desired affect – even if they were bought in the gear used would still be capable of shattering scallop shells and damaging, maybe killing flatfish”. **Individual non-scallop fisherman**

“Given the amount of technical regulations proposed it will be very difficult to assess, on an individual basis, what has and has not been successful”. **Manx Fish Producers Organisation Limited**

“All limits are irrelevant until an effective tracking system is fitted to ALL vessels”. **Individual non-scallop fisherman.**

“All dredging within all marine SACs should be prohibited with immediate effect. Outside marine SACs a strategy for moving towards more sustainable means of scallop exploitation and production might allow for continued dredging during a transition period in areas where it can be shown that damage will be temporary and recovery will be swift (within five years)”. **Wildlife Trusts**

“Proven safe method of anchoring; deploying one side of scallop gear on to the seabed, a normal anchor has a strong possibility of fouling and allowing the vessel to drift. A vessel anchored by one set of Scallop Gear with the crew sleeping and the engines stopped and not making way through the water cannot be “deemed to be fishing”. **Individual scallop fisherman**

i) What benefits or costs do you think these proposals will bring?

“There would be a cost to the industry in having to adapt and change gear, to comply with the proposals. **Llyn Fishermen’s Association**

“The proposals are workable but time would be needed to change over to use up the gear we have in storage and for manufacturers to produce the new gear **Individual scallop fisherman**

“Any of the proposed changes are better than none – Financial incentives and grant funding should be made available to encourage changes, along with suitable monitoring and research to encourage these changes, as technology improves i.e. to look at toothless dredges, Hydro-dredges and positively encourage diversification into diver caught scallops and farmed scallops”. **Individual non fisherman**

Effort restrictions

Two proposals were put forward with regards to effort control those being a reduction in the scallop season length, so it commences on 1 November and closes on 31 March (as opposed to closing on the 31 May) or to implement a days at sea regime of a maximum of 20 days per month at sea. Either of the above would be conjunction with all vessels being required to carry and complete a logbook denoting scallop landing information and days at sea.

- j) *Which of the above do you consider to be the most effective method of reducing effort?***
- k) *Do you agree with the proposed level of effort reduction and, if not, what do you believe would be the optimum level of effort reduction?***

Comments in favour

“Closing the scallop season on the 31st March would be a constructive way forward” **Individual scallop fisherman**

“Agree with the restriction of 20 days per month, a closed season encourages heavy fishing on the season opening. Agree with logbooks for all scallop landings”. **Clyde Fishermen’s Association**

“Any shortening of the scallop season should not apply to hand gathering of scallops. An end of July season end would provide an opportunity for ample underwater visibility for hand gathering”. **Individual scallop fisherman**

“Restrict fishing to daylight hours only 6am-6pm hence halving the potential effort” **Individual non-scallop fisherman**

“Suggest a days at sea regime of 140 days over 7 months, 1st November to 31st May”. **Scallop Association**

“If scallop dredging continues, of the options proposed, a reduced scalloping season is the preferred option. However, recovery of benthic organisms, particularly in the most vulnerable environments, may extend to years rather than months, with full recovery to pre-dredging conditions taking potentially many years”. **Friends of Cardigan Bay, Whale and Dolphin Conservation Society, Save our Seas, Cardigan Bay marine Wildlife Centre, Pembrokeshire Bird Group.**

Comments against

Does not agree with any of this section as effort will be restricted by other proposals **Individual non-scallop fisherman**

Shortening the season in April and May is unfair when the weather becomes more settled at this time of year. 20 days per month would be fairer effectively knocking over 2 months fishing time off the season. **Individual scallop fisherman**

A 'days at sea' regime would place an effort restriction on the smaller vessels and have little or no effect on the larger nomadic Scallop vessels. **Individual scallop fisherman**

Retained Fisheries Management from Scallop Fishing (Wales) Order 2005

Nearly all respondents were in favour of retaining the measures included in the Scallop Fishing (Wales) Order 2005, which were not been mentioned in the consultation to ensure at the very least the same level of protection is afforded.

Enforcement

To seek to ensure compliance in this fishery we proposed to consider ways in which current enforcement activity could be enhanced and consider the option for all vessels engaged in the scallop fishery to provide 4 hours notification before the commencement of landing of catches.

n) What do you see are the key areas for enhanced enforcement activity?

"Enforcement is critical factor in achieving compliance. I am encouraged by the new approach in relation to fisheries management and enforcement within Wales". **Individual non-scallop fisherman**

"Effective enforcement is a key to any sustainable fishery. It requires experienced people on the ground who thoroughly know their area, effective legislation which is clear and straightforward in interpretation and enforcement, and effective deterrents commensurate with the returns made from scallop dredging". **Individual non fisherman**

"A patrol boat should be constantly on the scallop ground, which would mean there would be no need for the 4 hour notification proposal". **Individual non fisherman**

"I have no problem whatever the enforcement regime is. In these days of real time satellite monitoring and the lack of choice of suitable landing ports in Welsh waters I am unsure of the need for a reporting in regulation". **Individual non-Welsh scallop fisherman**

"Something needs to be done in relation to the landing in other ports within the UK of 100mm scallops. This obvious loophole is regrettably one that is exploited". **Llyn Fishermen's Association**

“Causes great difficulty when fishing outside the 12 nautical miles not being able to transit Welsh waters or land in Welsh harbours, with 100mm scallops. This rule looses Welsh ports revenue from landing dues, haulage and wastes fuel with vessels going round” **Saltire Seafoods**

“Increased policing of minimum landing size to prevent undersized scallops fished in Welsh waters being landed in Scotland” **Clyde Fishermen’s Association.**

“Notification requirements have been devised for pressure stock species that are under threat. There is no evidence to suggest that this is the case for scallops in Welsh water” **Manx Fish Producers Organisation Limited**

“Concern over the lack of effective management and enforcement of the fishery, even at the height of the problems in early 2008. Concerns over 4 hour notifications with few port facilities”. **Welsh Federation of Fishermen’s Associations**

Proposals for the future management of the scallop fishery

The proposal is that a Scallop Fishing (Wales) Order 2009 will be introduced as the first in the series of measures over the coming years to seek to ensure that stocks are fished in a managed way. In order to improve the scientific base underpinning the management of the fishery a series of measures were proposed for the coming years as detailed below;

Further science and data

It was proposed that further research work around the sustainability of the scallop fishery be commissioned and to work with other bodies to build on CCW’s habitat mapping work, gather sensitivity data to scallop fishing and design and pilot a new method of fisheries management that may include temporal closures.

o) The Welsh Assembly Government would welcome any comments you have on this approach.

*“Welcomes the proposal to undertake further research into scallop fishing and to pilot management approaches. In order that future policy can be based on scientific evidence, we recommend that WAG and CCW monitor the impacts of the Order on habitats and ecosystems, particularly in the SACs”.***The National Trust**

“I hope that any research work will be open minded and not driven by the recent media coverage regarding the traditional, decades old scallop fishery in Welsh waters. I also hope that the wider industry will be part of this work; there are more than just Welsh fishermen who are "stakeholders" in the scallop fishery within Welsh waters”. **Individual non-Welsh scallop fishermen**

“WAG should have done their research first”. **Saltire Seafoods**

Without doubt there should be continuing studies carried out but in the meantime permits should be heavily restricted, both in number and agreed activity. **Individual non-scallop fishermen**

“In Wales over the last twenty five years, the only fishery during this period to withstand effort and is as good today as was thirty years ago is the scallop fishery therefore it is clearly sustainable **Individual scallop fishermen**

“There has already been ample research into scallop dredging already. On the other hand there is a need for more knowledge of the Welsh seabed for this and other reasons so continuation of seabed mapping is very much needed. **Individual non fishermen**

“By now it is recognised that there was a startling lack of science involved in the formation of the Cardigan SAC. **Individual scallop fishermen**

“There is a pressing need for more detailed data collection and monitoring of impacts of scallop dredging to inform fishery management. The proposal to commission further research and to undertake evaluate new practices is supported. Such research should seek advice not only from industry and research bodies but also from relevant environmental NGOs. **Friends of Cardigan Bay, Whale and Dolphin Conservation Society, Save our Seas, Cardigan Bay marine Wildlife Centre, Pembrokeshire Bird Group.**

We would welcome research into spatial and temporal mapping of scallop fishing and the sensitivity of benthic habitats. **Marine Conservation Society (MCS)**

Vessel tracking

The Welsh Assembly Government will work with the industry to determine methods of vessel tracking, to procure and pilot the tracking technology with a view to introducing compulsory vessel tracking for scallop fishing within 0-12nm. Approximately three quarters of respondents that replied on this issue agreed with vessel tracking for all scallop vessels. Those that didn't agree felt that this was not necessary because all vessels over 15m in length already had such a system installed. Many commented that payment for such systems should come from the government.

Permits

The Welsh Assembly Government will consider, with the industry, a potential role for a restrictive permitting scheme and permit variations as a way of dynamically managing effort and intensity for the future.

q) *The Welsh Assembly Government would welcome any comments you have on this approach.*

“Permit only a certain number of vessels to fish in Welsh waters and cut numbers in Cardigan Bay 08/09 season to 50%” **Charter Angling Boat Skipper**

“No problem with permit scheme but they would need to be a means of allowing young fishermen into the permit scheme”. **Individual scallop fishermen**

“Restrictive permits may well be an effective tool for a sustainable scallop fishing industry”. **Individual non- fishermen**

“To control vessel numbers in the fishery a permit system should be introduced with conditions tied to the permits” **Countryside Council for Wales (CCW)**

“I support a system of permits to limit the activity and number of boats. Large numbers of boats have been reported in the area, and the restriction of numbers will be a key tool for fisheries managers to work with”. **M Williams, MP**

“Strongly opposed to this measure. This is not designed for fisheries management but to stop vessels fishing” **Manx Fish producers Organisation Ltd**

“Scalloping already has a licence entitlement, no further permit required” **Clyde Fishermen’s Association**

Further gear restrictions

The Welsh Assembly Government will work with the industry and research bodies to explore options for less invasive methods of fishing, including further gear restrictions.

r) The Welsh Assembly Government would welcome any comments you have on this approach.

“Research on less invasive gear technology should apply to whole industry not just scallop fishing gear”. **Individual non-scallop fisherman**

“We would welcome research and collaboration on less invasive methods of fishing”. **The Scallop Association**

“This area should be explored. Methods of farming, diving should be encouraged as these methods will produce a better tasting and more selective yield with all the marketing implications of environmentally and sustainable caught food” **Individual non-fisherman**

“Fishermen need to be involved in this making sure that such developments suit everybody concerned” **Individual scallop fisherman**

“There has been failure of the scalloping industry to take steps to investigate dredging methods with least environmental impact. Given local resource constraints, but high levels of scallop activity around the UK, a collaborative approach between national authorities in the UK, including WAG, industry and others to design and evaluate alternatives is required.” **Friends of Cardigan Bay, Whale and Dolphin Conservation Society, Save our Seas, Cardigan Bay marine Wildlife Centre, Pembrokeshire Bird Group.**

“In particular, we would support mapping of seabed habitats according to sensitivity and to overlay these with maps of fishing activity to identify key areas for management action. We would also support further research on measuring by-catch and research into gear modifications to address this problem along with the environmental impact of towed gears upon hard substrates”. **WWF Cymru**

Annex A: List of respondents

Barratlantic Ltd
Carmarthen Bay and Estuaries European Site Relevant Authorities Group
Ceredigion County Council
Clyde Fishermen's Assoc
Countryside Council for Wales
Friends of Cardigan Bay, Whale and Dolphin Conservation Society, Save Our Seas, Cardigan Bay Marine Wildlife Centre, Pembrokeshire Bird Group
Llyn Fishermen's Association
M Williams MP
Manx Fish Producers Organisation Ltd
Marine Conservation Society
National Trust
Pembrokeshire Coast National Park Authority
Pembrokeshire Marine Special Area of Conservation Relevant Authorities Group
Saltire Seafoods
Scallop Association
Seafish
Seatrust
South and West Wales Fishing Communities Ltd
South Wales Sea Fisheries Committee
Welsh Federation of Fishermen's Associations
West Coast Sea Products
Wildlife Trusts
WWF

Plus twenty three individuals