

EAPO answer Dogger Bank Special Area of Conservation Consultation

<https://consult.defra.gov.uk/mmo/formal-consultation-mmo-mpa-assessments/consultation/subpage.2020-10-07.1069588890/>

Consultation closes 28/03/2021

= prohibition on all bottom towed fishing, including demersal and semi-pelagic trawls, demersal seines and dredges throughout the SAC, and a small buffer area around the SAC.

Questions:

1. Do you have any additional information about the location, condition or sensitivity of the designated feature and/or its sub-features?

The Dogger Bank is an area straddling on waters of different countries and **cooperation** is therefore key when setting up management measures.

The Scheveningen Group, of which the UK was a party has been preparing a Joint Recommendation regarding the Dogger Bank. The work that has been put in the proposal for the past 10 years should not be disregarded and taken off the table. All Member States, including the United Kingdom agreed to the Joint Recommendation in August 2019.

2. 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?

All information regarding the above point has been given and studied as part of the Scheveningen Group Joint Recommendation, agreed to by all Member States, including the UK. The work that has been put in the proposal for the past 10 years should not be disregarded and taken off the table.

3. How would the proposed management option affect you?

(Please provide evidence of this impact if possible. Please see 'More information' for details about the proposed management.)

EAPO is deeply concerned about the proposal made by the UK government to close the UK SAC of the Dogger Bank to many fishing gears. This will directly affect the viability of many fisheries and in turn strike coastal fishing communities around the North Sea. Some gears are the only ones available for a viable fishery targeting a number of species. It is unacceptable to completely ignore this, and announce such blanket ban.

The proposal to totally ban bottom towed gears, semi-pelagic trawls, bottom seines and dredges in the entire area is far from reaching balanced approach to the three pillars of sustainability. It completely disregards the stakeholder's position and the socio-economic consequences that are entailed.

It is also baffling to see that the UK is completely ignoring the Joint Recommendation of the Scheveningen Group to which the UK competent authorities signed up. The work that has been put in the proposal for the past 10 years should not be disregarded and taken off the table.

4. What other effects will the proposed management option have?

In addition to the negative effects mentioned in the previous question, the blanket ban proposed will create displacement of fishing in other areas with potentially negative environmental consequences. In cases where fishermen cannot catch their usual quotas, it might also lead to an increase of fish imports from 3rd countries with less stringent management measures.

Again, EAPO would like to remind that more than 10 year of work have been put into preparing a Joint Recommendation agreed to by all Member States, including the UK. This work cannot be disregarded.

5. Further information

If you have further information and wish to upload this in a separate document, please do so here.

⇒ See draft EAPO answer