

Title: Closed Areas Byelaw 2020 IA No: EIFCA009 RPC Reference No: n/a Lead department or agency: Eastern Inshore Fisheries and Conservation Authority Other departments or agencies: n/a	Impact Assessment (IA)			
	Date: 15/07/2020			
	Stage: Draft Version 1			
	Source of intervention: Domestic			
	Type of measure: Primary legislation			
Contact for enquiries: Julian Gregory (CEO)				

Summary: Intervention and Options	RPC Opinion: Not Applicable
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Cost of Preferred (or more likely) Option			
Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status Qualifying provision
£-192056.5	£-53473.4	£6212.3	

What is the problem under consideration? Why is government intervention necessary?

Bottom Towed gear and its potential impacts on circalittoral rock & Intertidal Saballaira within the Wash and North Norfolk Coast Special Area of Conservation (SAC) has been assessed and it has been concluded that impacts on site integrity are likely. Assessments have also been carried out for Bottom Towed gear use on *Sabellaria spinulosa* in the Inner Dowsing, Race Bank & North Ridge SAC and it has been concluded that impacts on site integrity are likely. Spatial closures are proposed through the Closed Area Byelaw 2020 which will mitigate the identified impacts and therefore the risk to the features. Intervention is necessary because of the risk to Marine Protected Areas (MPA) dictates that a regulatory approach is required. Fishing activity and its potential impacts on Eelgrass in the Humber Estuary has also been assessed as part of a review of the existing byelaw, evidence of the extent of the feature has indicated that the size of the initial closure can be reduced.

What are the policy objectives and the intended effects?

The policy objective is to manage long-term, sustainable fisheries with the Eastern Inshore Fisheries and Conservation District which do not adversely impact the conservation objectives of MPA's. The intended effect is to prevent degradation and or improve the condition of circalittoral rock, Intertidal *Saballaria* and *Sabellaria spinulosa* which has been assessed as being vulnerable to bottom towed gear. With regards to the closure in the Humber the closure required review and the review concluded that the new extent of the closure achieves the above policy objective, whilst not restricting activity unnecessarily.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 0. Do nothing
 Option 1. Discreate spatial closures encompassing the circalittoral rock feature, the Intertidal Saballaira sub-feature and the *Saballaria Spinulosa* sub feature through the Closed Area Byelaw 2020
 Option 2. Total closure of the Wash and North Norfolk Coast SAC, Inner Dowsing, Race Bank & North Ridge SAC (within Eastern IFCA's district)

The preferred option is option 1 as the proposed byelaw will ensure that fishing activity will not impact negatively on the conservation objectives of the Wash and North Norfolk Coast SAC, or the Inner Dowsing, Race Bank & North Ridge SAC. It will also not close any part of the site where the circalittoral rock, intertidal *saballaria* and *Sabellaria spinulosa* features do not exist.

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** 11/2026

Does implementation go beyond minimum EU requirements?	Yes			
Is this measure likely to impact on international trade and investment?	No			
Are any of these organisations in scope?	Micro Yes	Small Yes	Medium Yes	Large Yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)	Traded: N/A		Non-traded: N/A	

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Chief Executive: _____ Date: _____

Summary: Analysis & Evidence

Policy Option 1

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year	Time Period Years	Net Benefit (Present Value (PV)) (£)		
			Low: -568529.1	High: -2805.4	Best Estimate: -105905.5

COSTS (£)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0	325.9	2805.4
High	0	66049.0	568529.1
Best Estimate	0	12303.6	105905.5

Description and scale of key monetised costs by 'main affected groups'

The key monetised cost relates to the loss of fishing grounds to those who use bottom towed gear. There is anticipated to be no impact based on the best estimate in terms of the Humber area being reduced or the Circalittoral rock closure. There will be an estimated impact of £7046.60 in relation to the Saballaria closures. Regarding this impact fishers will be able to mitigate losses by fishing in different areas, as the proposed closures are limited in extent. The scale is therefore thought to be very low. There are costs in relation to enforcement costs to Eastern IFCA outlined below.

Other key non-monetised costs by 'main affected groups'

None anticipated, if this does occur it will be a low cost associated with increased vessel overhead costs (depreciation and fuel costs) as a result of increasing range to accommodate displacement from fishing grounds closed to fishing by bottom-towed-gear. There may be loss of potential future fishing opportunities in closed areas as raised during the informal consultation in relation to future seed mussel fisheries.

BENEFITS (£)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0	0	0
High	0	0	0
Best Estimate	0	0	0

Description and scale of key monetised benefits by 'main affected groups'

None Identified

Other key non-monetised benefits by 'main affected groups'

Protection of the circalittoral rock, intertidal *saballaria*, and *Saballaria spinulosa* identified as being at risk from bottom towed gear fishing activity will have a positive effect on the overall ecological functioning of the MPAs and potentially improve fishery productivity, including in relation to species other than those targeted using the relevant gear types (i.e. potting or netting fisheries and overall biodiversity may improve), such as gears that would not be effected by this regulation.

Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

Assumptions: In relation to the Circalittoral rock that no fishing occurs within the closed area and that the VMS data that shows this is representative of all vessels (VMS is only fitted on vessels over 12m). In relation to the intertidal *saballaria* and *Saballaria spinulosa*, that VMS data and shrimp returns are representative of the levels of activity within the closed area. Risks: Any fishing activity that occurs within the closed areas could cause displacement into other less sensitive areas with the effect of impacting site integrity (unlikely). The closure will prevent future fisheries (that may not have previously occurred or have historically occurred) within the area.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £:
Costs: 7046.60	Benefits: 0.0	Net: 7046.6	

Evidence Base (for summary sheets)

Problem under consideration

Defra’s revised approach to managing fishing activity in European Marine Sites requires Eastern IFCA to ensure that fishing activity does not have an adverse effect on site integrity in marine protected areas (MPA’s) which occur within the IFC District. This requirement derives from Article 6 of the Habitats directive and the Conservation of Habitats and Species Regulations (as amended) 2017 (SI 2017/1012). Furthermore, Eastern IFCA is required under the Marine and Coastal Access Act 2009 to further the conservation objectives of any marine conservation zones within the Eastern IFC District.

Eastern IFCA also has a duty to act to ensure the sustainable exploitation of fisheries within its district as per section 153 of the Marine and Coastal Access Act 2009. In carrying out its duties Eastern IFCA is obliged to ensure good environmental status of fish and shellfish stocks as per the Marine Strategy Framework Directive (2008/56/EC) namely; sustainable fisheries with high long-term yields, stocks functioning at full reproductive capacity, and to maintain or increase the proportion of older and larger individuals.

The prolific shrimp fishery (the primary type of bottom towed gear use as assessed) within the Eastern IFC District co-occurs primarily with the Wash and North Norfolk Coast Special Area of Conservation (SAC) – see figure 1. The fishery was assessed in accordance with s.63 of the Habitats and Species Regulations (as amended) 2017 and it was concluded that management measures are required to prevent an adverse effect on site integrity.

Further information about the requirement for closure can be found in action item 8 of the 41st Eastern IFCA full authority meeting.

Data about the features

Given that the features under consideration are considered ‘red-risk’ in relation to fishing with bottom towed gear (and other fishing types in relation to the Intertidal *Saballaria*), Defra’s revised approach to managing fishing activity in MPAs necessitates closures of the area to the fishing activity.

The Wash and North Norfolk Coast SAC

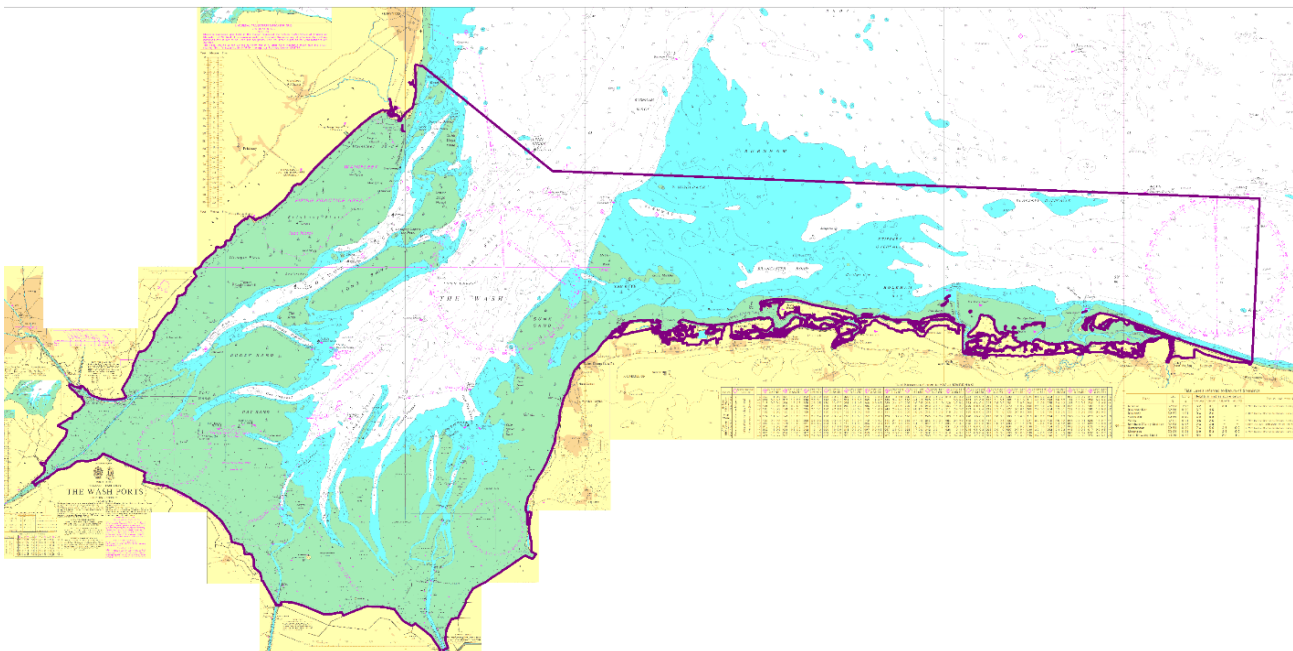


Figure 1. Chart showing the boundary of the Wash and North Norfolk Coast Special Area of Conservation.



Legend
The Wash and North Norfolk Coast Special Area of Conservation (SAC)

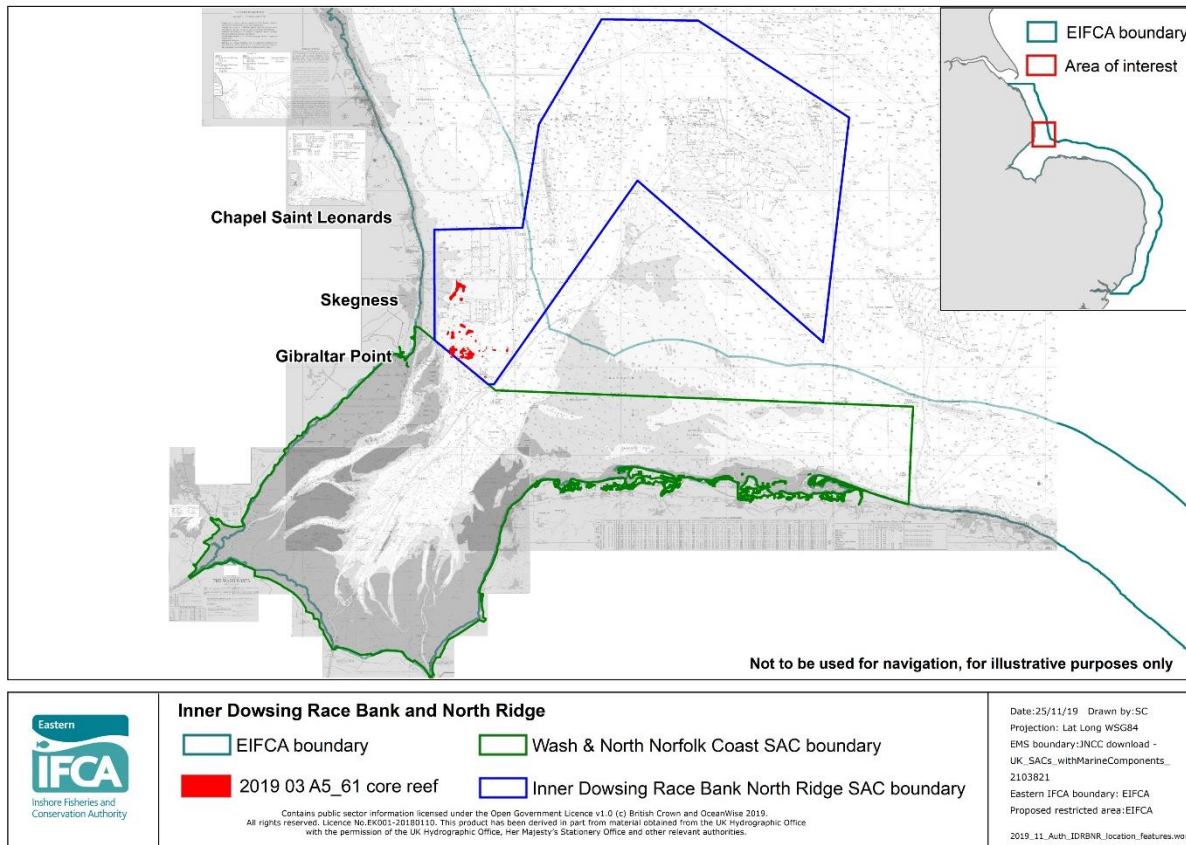
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Drawn by: SC
Date drawn: 02/07/15
Boundary data source: JNCC

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Not to be used for Navigation

Inner Dowsing, Race Bank & North Ridge SAC



Rationale for intervention

IFCAs have a duty to ensure that fish stocks are exploited in a sustainable manner, and that any impacts from that exploitation on designated features in the marine environment are reduced or suitably mitigated, by implementing appropriate management measures. Implementing this byelaw will enable Eastern IFCA to ensure that fishing activities are conducted in a sustainable manner and that the marine environment is suitably protected.

Fishing activities can potentially cause negative outcomes as a result of market failures. These failures can be described as:

1. Public goods and services – a number of goods and services provided by the marine environment such as biological diversity are 'public goods' (no-one can be excluded from benefiting from them but use of the goods does not diminish the goods being available to others). The characteristics of public goods, being available to all but belonging to no-one, mean that individuals do not necessarily have an incentive to voluntarily ensure the continued existence of these goods which can lead to under-protection/provision.
2. Negative externalities – negative externalities occur when the cost of damage to the marine environment is not fully borne by the users causing the damage. In many cases no monetary value is attached to the goods and services provided by the marine environment and this can lead to more damage occurring than would occur if the users had to pay the price of damage. Even for those marine harvestable goods that are traded (such as wild fish), market prices often do not reflect the full economic cost of the exploitation or of any damage caused to the environment by that exploitation.

3. Common goods - a number of goods and services provided by the marine environment such as populations of wild fish are 'common goods' (no-one can be excluded from benefiting from those goods however consumption of the goods does diminish that available to others). The characteristics of common goods (being available but belonging to no-one, and of a diminishing quantity), mean that individuals do not necessarily have an individual economic incentive to ensure the long-term existence of these goods which can lead, in fisheries terms, to potential overfishing. Furthermore, it is in the interest of each individual to catch as much as possible as quickly as possible so that competitors do not take all the benefits. This can lead to an inefficient amount of effort and unsustainable exploitation.

IFCA byelaws aim to redress these sources of market failure in the marine environment through the following ways:

- Management measures to conserve designated features of MPAs will ensure negative externalities are reduced or suitably mitigated.
- Management measures will support continued existence of public goods in the marine environment by conserving the range of biodiversity in the Eastern IFC District.
- Management measures will also support continued existence of common goods in the marine environment by ensuring the long-term sustainability of shrimp stocks in the Eastern IFC District.

Policy objective

The policy objective is to ensure that the bottom towed gear fisheries (and other fishing types in relation to the intertidal *Saballaria*) within the Wash and North Norfolk Coast SAC and the part of the Inner Dowsing, Race Bank and North Ridge SAC within Eastern IFCA's district do not have an adverse effect on site integrity whilst minimising the economic impact on the fishing industry. The size and shape of the closures are intended to be representative of minimum requirements to ensure conservation objectives are met but also effective, enforceable and clear to impacted stakeholders. The intended effect of the measures is to prohibit the use of bottom towed gear (and other fishing types in relation to the intertidal *Saballaria*) in areas which contain habitats which are likely to be damaged by their use and with the effect of adversely affecting site integrity.

In relation to the restricted area in the Humber, the aim of the proposal is to ensure that the above policy objective is still met, whilst also ensuring that the size of the restricted area reflects that needed to have a protective effect and is not excessive.

Description of options considered (including status-quo)

Option 0 (do nothing) – status quo

Eastern IFCA identified additional 'red-risk' interactions within the Wash and North Norfolk Coast SAC and the Inner Dowsing, Race Bank and North Ridge SAC. Red-risk interactions relate to the interaction between a type of fishing activity and a feature (or sub-feature) of an MPA which is likely to be impacted by that activity. The present proposals relate to the red-risk interaction of fishing with bottom towed gear concurrent with circalittoral rock, Intertidal *Saballaria* and *Saballaria spinulosa*. Defra policy (Defra's revised approach to fisheries management within MPA) requires the removal of the fishing pressure for 'red-risk' interactions. The 'do nothing' option would have the least economic impact on stakeholders, however, is not considered to adequate to reduce the risk of impacts from bottom towed gear within Wash and North Norfolk Coast SAC and the Inner Dowsing, Race Bank and North Ridge

SAC and would not be in keeping with Defra's revised approach and is therefore not considered a viable option. In relation to the reduction of size in the Humber, to leave the closure would provide no additional benefit, and would be in contrast to Eastern IFCAs need to review the closure and using best available evidence in relation to management measures.

Option 1 (preferred option) – Closed Area Byelaw 2020

The Closed area Byelaw 2020 will introduce restricted areas in addition to those in effect via the Marine Protected Areas Byelaw 2019 to prohibit the use of bottom towed gear in relation to Circalittoral rock, Intertidal *Saballaria* and *Saballaria Spinulosa* (the red-risk interactions). So as to be effective, closures are proposed which are as simple shape as possible and do not necessarily follow the convoluted extent of sub-features identified. As such, closures will also encompass some habitats and features which are not considered at risk of damage. In addition, hand-working and crab tiling will also be prohibited in relation to intertidal *Sabellaria* (which is also identified as a red-risk interaction).

Option 1 will also reduce the size of the restricted area within the Humber Estuary SAC for the protection of eelgrass which prohibits hand-working and crab tiling in addition to use of bottom towed gear. This reflects an assessment concluding that the size of the restricted area is in excess of that required to have a protective effect on the eelgrass sub-feature.

Option 2 – Closure of MPA to bottom towed gear

Closure of the sites would meet the conservation objectives of the site but have disproportionate impacts on the industry. It also goes beyond the minimum requirement to achieve the conservation objectives of the associated MPA. Therefore, this option was not considered viable.

Monetised and non-monetised costs and benefits of each option (including administrative burden)

Option 0 (do nothing) – status quo

There are no monetised costs associated with the 'do nothing' option.

The key non-monetised costs relate to the impacts on ecosystem functioning resultant of continued fishing activity in the areas proposed to be closed. Impacts on ecosystem function is likely to lead to impacts on the sustainability of the fishery and its productivity.

In addition, the 'do nothing' option is not in keeping with the requirements of the Habitats Directive or the Marine and Coastal Access Act 2009 and as such may lead to infraction proceedings being taken against the UK.

Option 1 (preferred option) – Closed Area Byelaw 2020

Intertidal Seagrass

There are no anticipated costs, based on this area being a reduction in size from a previous closure. Therefore, this change opens up more area to fishing. The newly proposed closure still adequately protects the feature.

Circalittoral Rock

There are no anticipated costs based upon the loss of fishing grounds in relation to the closure for circalittoral rock. There may be some fishing for crab, lobster and whelk in the area however these activities will not be prevented. Regarding the closure for Circalittoral Rock, Shrimp fishing and beam trawling for white fish are the main impacted activities but are not thought to occur in this area. This is supported by VMS data which shows that there is unlikely to be any fishing effort within the area

proposed to be closed. There are limitations with the VMS data, in that it only reports location once every 2 hours and is only fitted on vessels larger than 12m. However, this is mitigated by the large set of data and that there is only 1 ping within this area. It is also anecdotally known that shrimp fishing doesn't occur over this habitat type.

Intertidal *Saballaria*

There are moderate costs associated with the loss of fishing grounds over the Intertidal *Saballaria*, in relation to bottom towed gear use. This is supported by VMS and Shrimp returns data which shows moderate fishing effort in the area with around 2% of shrimp fishing occurring within a box where the closure is, with the closure representing 0.2% of this box.

The high cost of this closure is £53,375 (based on the highest value of shrimp caught in any reporting year, and that all of the 2% of shrimp fishing in the corresponding box occurs in the closure area).

The best estimate cost is estimated as £6506.60 (based on the average value of shrimp over the reporting period, and that effort in the corresponding shrimp return box is consistent and that 0.2% of the value of shrimps come from the closure area). This is deemed a slight overestimate and it is thought less fishing will occur than this in the area.

The low cost is estimated as £23.92 (based on the lowest value of shrimp caught in a year and that effort in the corresponding shrimp return box is consistent and that 0.2% of the value of shrimps come from the closure area), as the area is not thought to be a prime fishing area, ultimately the low cost could be 0 however the figure of £23.92 is more precautionary.

There is no evidence to support that any bait digging, hand working, or crab tiling occurs in this area. The proposed closed area is outside of the area covered by Eastern IFCA cockle survey. It is deemed as an unlikely area to support cockles; the ground appears to be unsuitable for this species. Historically there has been a mussel bed in the area but did not survive for long.

VMS data indicates where vessels ≥ 12 m have undertaken shrimp fishing activity within the proposed closure area. Data is from 2018. Activity has been cross-referenced with shrimp sales notes to ensure the vessel reports that relate to shrimp fishing alone and no other type of fishing. There were 4 vessel reports in the area for 2018 and 8 vessel reports in the area in the last 5 years. This is in the context of 5076 total vessel reports in 2018 and 29392 reports over the course of the last 5 years

Saballaria spinulosa reef

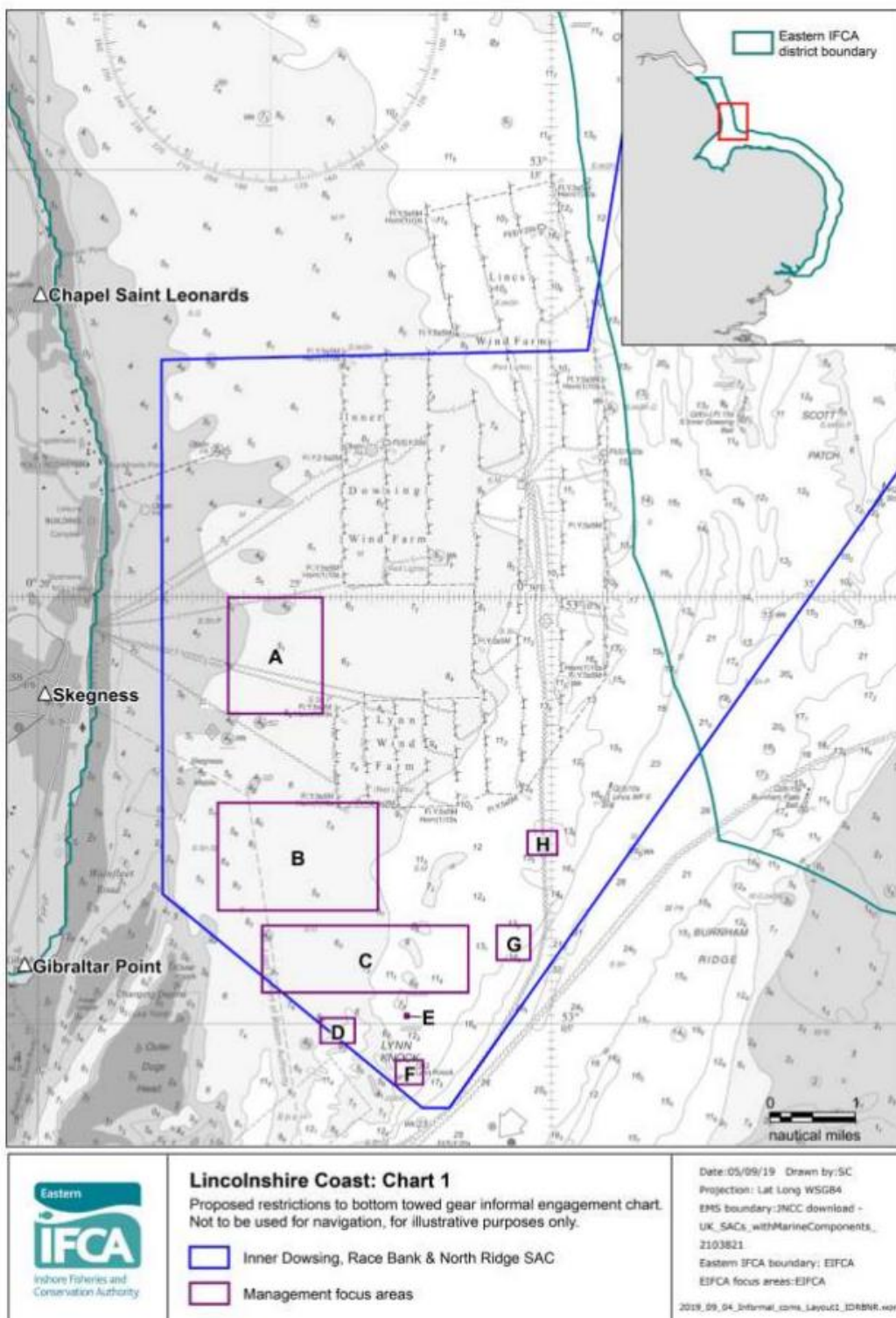
Stakeholder engagement has indicated that historically parts of this area have been important mussel seed ground. They also indicated that areas A, B and C (see below chart) of which the proposed closures fall within (albeit being far smaller) can be important shrimp fishing ground. No further fisheries were identified. There are no VMS pings within, or near to the closures, with the more heavily fished areas clearly being off to the east and west.

The high cost of the closure is estimated as £2160 based on all activity from the corresponding shrimp return boxes coming from within the closed area and a high price (£10) per kilo of shrimp.

The best estimate for the cost of this closure is estimated as £540, based on an average price of shrimp for the reporting period (2011-2019) and that all shrimp from the corresponding shrimp returns box came from the closure area (this is deemed unlikely).

The low cost of the closure is estimated as £302 based on all shrimp from the corresponding shrimp returns box came from the closure area and the lowest price per kilo (yearly average) during the reporting period (2011-2019).

Management Focus areas from the Informal Consultation



Costs to Eastern IFCA

Additional compliance activities will be required in addition to education and engagement. The cost of these are estimated to be £10,514 based on six additional sea patrols and 4 additional shore patrols. There are existing closures in the area, which are already routinely monitored, but the closures in the Inner Dowsing and Race Bank SAC are further away from any port location and existing closures and as such would need the additional patrols in order to be monitored. It is possible that costs could be high if the number of patrols have to increased based on risk with the fishery as directed through the

Tactical Coordinating Group. This is deemed unlikely, due to the current lack of fishing effort within the proposed closed areas as shown using current evidence. The high cost is 6 additional sea patrols, and 4 additional shore patrol costs, which is deemed unlikely due to the above rationale. Therefore, the best estimate is half this number of patrols costing £5,257. The low estimate is that no extra patrols are carried out as enough enforcement activity already occurs in this area, due to monitoring of closures already in the area and general enforcement patrols that are carried out throughout the district.

Table 2. showing the breakdown of costs associated with additional compliance needs resultant of introducing a new byelaw.

Costs associated with 1 sea patrol				
Crew: -	Number required	employment cost including on costs	working days	cost per 7.4-hour day
Senior IFCO	1	46197	225	205.32
Grade 5 IFCO	3	120385	227	530.33
Total cost				735.65
		annual cost	days at sea	
<u>Operation cost of vessel</u>			70	
Maintenance/refit		15,500.00		221.42
Insurance		3,250.00		46.42
Fuel etc.		500		500
Total Cost		19250		767.65
Total operation cost per day/trip				1503.30
Costs associated with 1 shore patrol				
Crew: -	Number required	employment cost inc on costs	working days	cost per 7.4-hour day
Grade 5 IFCO	2	80257	227	353.55
Total cost				353.55
<u>Operation Cost of Patrol vehicle</u>				
	Per day	£20		£20
Total operational cost of shore patrol per day				373.55

Further information

On average, vessel patrols are carried out with 1 Senior IFCO and 3 IFCO's. Shore patrols are usually carried out by 2 IFCO's. Lone patrols can be carried out, and patrols can be carried out by Senior IFCO's, so this figure is seen as representative.

Option 2 Closure of MPA to bottom towed gear

The pink and brown shrimp fisheries in the Eastern IFC District are worth between £584,525 and £2,668,788 per annum. The vast majority of these fisheries are thought to occur within the Wash and

North Norfolk Coast SAC although there are other notable areas are off the Lincolnshire coast and north of this MPA.

The potential impact of this option is likely to be underestimated by the landed value of catch. The factories which process the shrimp caught (both of which are based in King's Lynn) rely to a large degree on the shrimp market. The market price for the processed shrimp is likely to be much higher than the landed value and which includes a significant amount of export to foreign markets (primarily Netherlands). There are a significant number of tertiary jobs associated with this fishery and these processing factories (i.e. engineers, factory workers, delivery drivers).

Closure of the whole site would meet the conservation objectives however; it is likely to cause a large impact on stakeholders with little or no additional benefit to site integrity. As such, it is considered disproportionate to close the entire site to bottom towed gear.

Rationale and evidence that justify the level of analysis used in the IA (proportionality approach)

This assessment has used the following information:

- MMO landings data (2010 to 2017 inclusive)
- VMS data (2012 to 2019 inclusive)
- Anecdotal information provided by fishers (during informal engagement)

The analysis has considered the best available evidence to estimate monetised costs where the data will allow such. This has included consultation with stakeholders who are likely to be impacted. In relation to the Circalittoral rock there have been no concerns raised by the fishing industry in relation to the closure during the informal engagement period, this is despite all fishers (whom we hold contact details for) within the Eastern IFCA district being directly contacted either by post or email.

In relation to the Intertidal *Saballaria* there are some perceived impacts in relation to fisheries stakeholders. These were raised during the informal consultation period and evidenced by Eastern IFCA shrimp returns and MMO VMS data. No concerns were raised in relation to crab titling, concerns were raised in relation to the area being a cockle bed, however information shows that this area is not included in the WFO cockle fishery.

In relation to the *Saballaria Spinulosa* in the Inner Dousing and Race Bank SAC there were some stakeholder concerns around loss of shrimp ground, which is unsupported by the data held that shows there is not shrimp fishing activity in the area due to be closed.

Risks and assumptions

Circalittoral rock

The conclusion that this area has limited to no fishing impact is based upon limited stakeholder input which is assumed to be representative of the industry, however data sources such as VMS and Shrimp returns data corroborate this. Local knowledge has shown that the grounds are not suitable for shrimp fishing and this is the primary bottom towed gear fishery in the Wash.

The absence of VMS pings in the area means that we are confident that this represents the fishing pattern (no fishing in the area). However, given that VMS only pings once every 2 hours it is plausible though unlikely that some vessels have fished in the area, but have never been there when there VMS pings.

In addition, as set out above, shrimp fishing grounds are known to move within and between years. As such, the importance of the areas closed to fishing are likely to change over time. It is however thought

that the habitat is unsuitable for shrimp, if the habitat was to change then it is likely the closure would be reviewed.

Intertidal saballaria

That the low level of VMS pings and shrimp returns data correctly indicate low activity (shrimp trawling) in this area. Local knowledge and lack of stakeholder input has shown that there is limited other fishing activity (hand working, crab tiling). It is also thought that this habitat is unsuitable for brown shrimp, if the habitat changed it is likely the closure would be reviewed.

Saballaria Spinulosa

As with the other sub-feature closures it is assumed that the data showing low vessel activity in the areas, is representative of fishing activity. It is assumed that the responses related to fishing activity in the area are representative of the fishing industry. In addition, as set out above, shrimp fishing grounds are known to move within and between years. As such, the importance of the areas closed to fishing are likely to change over time.

A risk is that although mussel beds have not been found in recent years in the areas, as they are ephemeral they could be present in future years and this has not been assessed.

Direct costs and benefits to business calculations

Direct costs to business could occur due to non-compliance with the regulation. It is difficult to estimate costs, but they would only be placed on business following non-compliance, and ultimately in line with Eastern IFCA's regulation and Compliance Strategy where there is a proportionate approach to enforcement with education, engagement and endorsement of compliance being at the forefront of the strategy.

No costs or benefits identified in relation to voluntary and community bodies.

A brief qualitative summary of the potential trade implications of measure.

None anticipated.

Wider impacts

No wider impacts identified.

Summary and preferred option with description of implementation plan.

The preferred option is option 1 – Closed Area Byelaw 2020. This would close one area to the use of bottom towed gear and require the gear to be secured and stowed when transiting restricted areas with an exception in certain circumstances.

These closures are in addition to the closures already implemented in the Marine Protected areas Byelaw 2019.

The proposed measure will have the effect of protecting the sensitive sub-features within the Wash and Norfolk Coast SAC and the Inner Dowsing, Race Bank and North Ridge SAC from the effects of bottom towed gear and other fishing activity but minimise the impact on industry by closing only those areas which will be impacted.

To implement these measures, fishers will be made aware of the additional closures through updates to the Eastern IFCA website and targeted dialogue with fishers. Officers will engage with the industry to educate and engage as per Eastern IFCA's Enforcement Policy and Regulation Strategy¹.

¹ <http://www.eastern-ifca.gov.uk/wp-content/uploads/2016/03/RC-Strategy.pdf>