

Financial Arrangements - Update

Background

A Financial Plan for the Association was prepared and agreed in 2010. An update was considered at the last meeting of the Association in April 2013, when it was agreed that some additional matters should be considered in the budget and that a review of the budget and funding model should be presented to this meeting.

Recommendations

1. That the proposed Financial Plan should be discussed, and subject to any amendments, agreed by the Association.
2. That proposals for altering the budget and income to the Order over the next few years are discussed and subject to any amendments, agreed by the Association.
3. That the Association should consult with the lease and licence holders, and also with WAG before implementing any changes to lease or licence fees.

The remainder of this report is considered to be commercially sensitive and has been withheld from publication.

MSFOMA Secretariat
September 2013

Developing the Fishery Order Area

Background

The Menai Strait Fishery Order allows both for the cultivation of mussels, and also for them to be gathered by hand by a small number of licensed fishermen. At the April meeting of the Association there was some discussion about the number of licences that should be issued for the Order area, and also the number of leased areas. This report provides an update on progress with both issues, as well as an update on steps to renew the Fishery Order.

Recommendations

1. That the Association considers the management issues associated with the possible creation of new cultivation areas within the Menai Strait Fishery Order that are set out below.
2. That the Association considers the management issues associated with the fishing licences issue for the Menai Strait Fishery Order that are set out below.

The remainder of this report is considered to be commercially sensitive and has been withheld from publication.

MSFOMA Secretariat
September 2013

Welsh Government Activity

Background

The Welsh Government has been continuing with the process of reviewing and modernising the management of sea fisheries and aquaculture around the coast of Wales. This report provides a brief update on recent progress with this initiative to brief Members of the Association ahead of discussions with Welsh Government officers who are expected to attend the meeting.

Recommendations

1. That that the proposed changes reported here are noted.
2. That the Association considers the response(s) that it may make to the on-going changes to fisheries and aquaculture management around the Welsh coast.

1. Proposed changes to Several and Regulating Order regime in Wales

- 1.1 A consultation document setting out some proposals for changing the existing regime for Several and Regulating Orders in Wales was submitted to the April meeting of this Association for consideration. This document is attached at Annex A.
- 1.2 The April meeting of the Association resolved that a meeting should be sought with Welsh Government officials to discuss the proposals in greater detail. This meeting took place in Bangor in May 2013. Following the meeting the Chair of the Association wrote to the Welsh Government to formally welcome many of the proposed changes (see Annex B).
- 1.3 It is now understood that the Welsh Government is seeking to progress these changes through the proposed Environment Bill that is due to be published as a White Paper for consultation in the autumn. Welsh Government Officers have been invited to attend the Association meeting to provide a further update on progress with this initiative.

2. Cockle Fishery Management Proposals

- 2.1 In July 2013 the Welsh Government issued a consultation document setting out proposals for establishing an All Wales Permit Scheme for cockle picking. The full consultation document is 28 pages long, and can be downloaded [here](#).
- 2.2 The Association is advised that none of the proposals in this document appear to adversely affect mussel harvesting and cultivation in the Menai Strait. There appears to be no need for the Association to raise any concerns about the proposals. There is, however, an opportunity to welcome the commitment to sustainable fisheries management set out in the proposals.

Annex A: Welsh Government Proposals for Changing the Fishery Order Regime

Proposed Changes to the Several and Regulating Shellfishery Order regime in Wales.

Reasons for change

We have been looking at ways to improve the SR system in Wales in order to help improve, encourage and create sustainable, environmentally sound and economically viable shellfisheries in Wales.

Part 1 of the 1967 Act could be improved to make the process much more efficient for both the Welsh Government and the applicant fishermen. Our key aims are to:

- ensure that Wales has increasingly resilient and diverse Shellfishery ecosystems that deliver economic, environmental and social benefits now and in the future;
- enhance economic opportunities whilst protecting vulnerable environmental features; and
- provide a more integrated and efficient approach to the management and regulation of Shellfisheries in Wales, without unnecessary bureaucracy.

We have been taking note of your issues and suggestions for how the system could be better and we now have a rare chance to make improvements in Wales through the proposed Environment Bill (which allows us to alter relevant Primary Legislation.)

Issues

It is becoming more difficult to process applications for Orders due to the age and the inflexibility of the 1967 Act. Most applications should on average take around 6-9 months to progress to issuing an Order. This would probably be longer for fisheries in SSSI's, SACs etc depending on the site itself and the type of fishery. However at present, even relatively straight forward, simple applications outside EMS are taking at least 2 years onwards to be processed.

The age of the 1967 Act

It predates all current EU environmental legislation which means that when the application is being considered by the Welsh Ministers, considerable time is spent in making sure that it complies with all the relevant and current legislation (mainly environmental and enforcement). Updating the Act will make it easier to consider all the appropriate legislation and should make this part of the process quicker.

The inflexibility of the 1967 Act.

In order to amend/vary a granted Order, applicants need to make a reapplication. This has to follow the same principle and process as the original application. Due to the changing nature of the marine environment, this makes it difficult for an applicant to

provide a management plan which could be approved for a period of longer than 10 years. Even 5 years or greater can prove a problem.

Solutions:

1) To make the application process simpler and provide better guidance

The application forms and guidance need revising in order to make it clear to applicants what should and shouldn't be included in an application. We want to make it possible to accept the majority (if not all) of an application in an electronic format including the Admiralty maps.

2) Update the Act so the environmental and enforcement duties are clearer.

This is more of an internal process but should have benefits for the industry in terms of a shortening of the time needed in order to fully process applications

3) To make it easier to amend/change existing Orders by removing the need to go through the entire application process

4) To provide a mechanism so that the management of the fishery could be regularly reviewed depending on the marine environment and any to have regular reviews- this would mean that Orders could be granted for longer periods of time than 5-10 years

One option for 3&4 could be the introduction of a Code of Practice for each fishery instead of the management plan. This would be drawn up by the applicant and would need to be agreed by the Welsh Ministers. This would then become a piece of legislation which the Welsh Ministers would have the power to change as needed - meaning that in order to alter/vary anything, applicant would not need to go through the entire process from the beginning. This would also mean that we could consider granting Orders for a greater period of time as the Code of Practice could be altered as necessary to reflect any positive or negative change in the marine environment

Regulating Orders

We are also looking simplifying the application process for Regulating Orders by replacing them with a restrictive permitting scheme. This will offer the same type of fishery but will not be subject to the public inquiry process- making it better value for money and easier to obtain.

What we want from you

As mentioned we are intending to make these changes through the proposed Environment Bill which should be ready for consultation late 2013. However we want to make sure that all our proposed changes have the approval and support of the industry before the consultation period.

We want your opinions on our proposed changes;
What you think will work and why;
What you disagree with/think you would have difficulty with;
Also if you have any alternative/complementary ideas that we could investigate in the next few months to see if they would be possible.

Annex B: MSFOMA Response to Proposed Changes to the Fishery Order Regime.

Menai Strait Fishery Order Management Association

Port Penrhyn, Bangor, LL57 4HN

Jodi Massey
Welsh Government
Sea Policy Executive
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23rd May 2013

Dear Jodi

PROPOSED CHANGES TO SEVERAL AND REGULATING ORDER REGIME IN WALES

I am writing further to our meeting earlier this month. We agreed at the meeting that it could be useful for us to formally respond to you in order to inform the work that you are now carrying out to progress revisions to the regime under the proposed new Environment Act in Wales.

I should preface these comments by saying that from the MSFOMA perspective the current regime works very well indeed, and we do not necessarily agree with the "Issues" set out in the discussion document. However we support the proposed improvements to the regime, and have chosen to focus on these matters in our response.

1. Simpler application process with better guidance

We would welcome this proposal, and we are sure it will be widely supported.

We feel that the application process would be greatly improved if it was also accompanied with a clear timetable which would set out the time allotted (to both the Welsh Government and the applicant) for the various steps in the process. This could be accomplished through administrative procedures (such as improved guidance) or deadlines set in statute (such as those used in §28H of the Wildlife & Countryside Act).

The key issue for the industry in general is that the application process should be both swift and definite so that time is not wasted waiting for a determination to be reached, whether approving or declining an application.

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2. Clarify environmental and enforcement duties

With regard to the enforcement duties associated with Fishery Orders we note that a peculiar situation has arisen in Wales with the demise of the old Sea Fisheries Committees, and that it is appropriate for enforcement powers to be clarified. You might find it helpful in this regard to consider that enforcement powers under the Sea Fisheries (Shellfish) Act 1967 were bolstered in Scotland by the addition of §4A-4D under the Police, Public Order and Criminal Justice (Scotland) Act 2006 ASP 10 (Part 3, §98(1)).

3. Simplify amendment process

The proposal to simplify the amendment process is welcome, providing that this does not undermine the protection that Several and Regulating Orders provide to shellfish farmers and shellfishermen in Wales.

We would welcome the opportunity to amend existing Orders so that they might be able to support the cultivation or husbandry of additional shellfish species, or the use of practices that were not anticipated in the original Order.

We would, however, strongly resist any proposals that would allow 3rd parties to apply for the amendment of an existing Fishery Order once it is made. This would remove the security of tenure provided by a Fishery Order that is the foundation of this legislation. Undermining these legal foundations would threaten the future of the Welsh shellfishing businesses that are currently thriving in Fishery Order areas.

4. Create new system for management review

We understand that your legal advisors have raised concerns about the relationship between Fishery Orders assigned to a single operator and compliance with the Habitats Directive. It appears that these are issues that do not apply directly to MSFOMA. Our only comment would be that if this issue could be addressed to the benefit of the shellfish industry in Wales, it would be widely welcomed.

5. Replacement of Regulating Orders

We understand from our discussion with you that this option is no longer being considered, so have no comments at this time.

In addition to the comments on your proposals, we felt that it might be appropriate to make some suggestions of our own that might be useful in this process:-

- **Renewal of Fishery Orders** – it might be useful to broaden the scope of the proposal to simplify the amendment process so that it would encompass the renewal of existing Orders. This change would assist with the renewal of the cockle fishery Orders in North and South Wales, and also with the renewal of the Menai Strait Oyster and Mussel Fishery Order 1962 in 2022.
- **Cross-border integration** – it will be important to ensure that the introduction of new management measures for the shellfish industry in Wales does not put us at a competitive disadvantage to our colleagues elsewhere in the UK; and equally that difference in the interpretation of legislation by different administrations in the UK does not add to delays in

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the creation of Fishery Orders. In this regard, we would strongly recommend that you make contact with the Shellfish Association of Great Britain if you have not done so already.

We hope that these comments are helpful. If there is any further information you require from us to assist with this review process, please do not hesitate to get in touch with us.

Yours sincerely

SUE UTTING
Chair, MSFOMA

Cc David Jarrad, Shellfish Association of Great Britain

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North West Inshore Fisheries and Conservation Authority Activity

Background

The North West Inshore Fisheries and Conservation Authority (NWIFCA) is responsible for managing sea fisheries, including mussel fisheries, in the coastal waters lying between the Dee and the Solway Firth. This area includes the UK's largest seed mussel resource, which is vital to the ongoing success of the Menai Strait mussel fishery. This report provides a brief update on NWIFCA activities that could have an impact on the Menai Strait mussel fishery.

Recommendation

1. That the Association considers the response(s) that it may make to the NWIFCA concerning the management of mussel fishing within its District.

1. Morecambe Bay Fishery Order

- 1.1 The NWIFCA has been working on proposals to establish a new Fishery Order for all of Morecambe Bay for several years. The proposed new Fishery Order would cover all of Morecambe Bay and would establish a Regulated Fishery for cockles and mussels, as well as providing opportunities for shellfish cultivation within Several areas in the Bay.
- 1.2 The new Fishery Order is larger in both scope and scale than its predecessor, the Morecambe Bay Fishery Order 1978, which expired in 2008. This earlier Order was limited in its scope to the regulation of fishing for mussels, and the extent was limited to the "South America" mussel skear in the northern part of Morecambe Bay where the annual seed mussel fishery takes place.
- 1.3 It is understood that the NWIFCA has submitted its formal application for a 30 year Fishery Order for Morecambe Bay to Defra. The application is supported by the local fishing industry and also by Natural England. Defra and the NWIFCA are understood to be in the process of securing the support of all of the interested parties associated with the Fishery Order, and are optimistic that the new Order will be made in time for the 2014 seed mussel fishery.

2. Byelaw 3 (Permit to fish for cockles & mussels)

- 2.1 This byelaw was introduced by the NWIFCA in 2012 to regulate the harvesting of cockles and mussels in the NWIFCA District.
- 2.2 During 2013 the NWIFCA has used this new Byelaw to regulate the fishery for seed mussels on South America mussel skear in Morecambe Bay. A levy has been charged for a limited number of permits that were issued to mussel dredgers to allow them to fish for seed mussels in a specified area.
- 2.3 It is understood that Byelaw 3 enabled the NWIFCA to manage the seed mussel fishery effectively in 2013. A verbal update on the effectiveness of this management approach will be given to the meeting by industry representatives.

MSFOMA Secretariat
September 2013

Fishery Management Issues

Background

“Fishery Management Issues” have become a standing item on the agenda for MSFOMA meetings. The agenda item is usually informed by verbal reports from the industry on topical issues of concern. On this occasion a written report has been prepared in order to inform the Association of actions that have been taken at the EU level on issues of concern to the management of the Menai Strait Fishery Order.

Recommendation

1. That the Association considers the response(s) that it may make to the NWIFCA concerning the management of mussel fishing within its District.

1. *Bonamia* in the western Strait

- 1.1 A verbal report shall be submitted to the Association on progress with the eradication of the shellfish parasite *Bonamia* in the western Menai Strait.

2. Invasive Alien Species - EU Proposals

- 2.1 Members of the Association will be aware of the problems that Invasive Alien Species can cause both on land and at sea. On September 9th, the EU set out proposals for new legislation designed to prevent and manage the spread of these species.
- 2.2 The EU proposals can be viewed on the EU website [here](#) and are outlined in the press release attached at Annex A. The EU reports that there are thought to be around 12,000 alien species in Europe, and that between 10 and 15% of them can cause the sort of problems that the proposed legislation seeks to remedy.
- 2.3 Members are advised that at this point the proposed legislation concentrates solely on the measures that might prevent and manage the spread of invasive alien species. The draft legislation does not include a list of the species that will be subject to this management regime.
- 2.4 The Menai Strait mussel fishing industry is based entirely on native species. The proposals to manage and prevent the spread of invasive alien species should therefore be broadly welcomed, providing that they do not place unnecessary constraints on the movement of mussels between coastal sites in the UK or their export to Europe.

3. *Norovirus* - update on status of EU negotiations

- 3.1 At the April meeting of the Association it was reported that the EU was considering proposals to introduce limits on the levels of *Norovirus* in raw shellfish meat. The shellfish industry in the UK and elsewhere in Europe had raised concerns about these proposals.

- 3.2 Following the discussion at the last meeting, the Chair of the Association wrote to the Food Standards Agency to register concerns about the proposed new *Norovirus* legislation (see Annex B).
- 3.3 In July 2013 the Food Standards Agency (FSA) wrote to the Association indicating that there were insufficient data available to progress the proposals at this time (see Annex C).
- 3.4 Any further developments with this matter will be reported verbally to the Association.

4. Marine Conservation Zones

- 4.1 A verbal update of any progress with the introduction of Marine Conservation Zones will be made to the meeting by relevant officers.

MSFOMA Secretariat
September 2013

Annex A: EC Press Release announcing action to tackle Invasive Alien Species



EUROPEAN COMMISSION

PRESS RELEASE

Brussels, 9 September 2013

Environment: New EU Action to protect biodiversity against problematic invasive species

The European Commission today proposed new legislation to prevent and manage the rapidly growing threat from invasive species. There are currently over 12 000 species present in Europe which are alien to the natural environment. About 15% of these are invasive and they are rapidly growing in number. The proposal is designed to respond to increasing problems caused by these invasive alien species, which include:

- An **economic** problem: invasive alien species cause damage worth at least EUR 12 billion every year in Europe, through hazards to human health (e.g. the Asian hornet and tiger mosquito, whose effects can be fatal), damage to infrastructure (e.g. Japanese knotweed damaging buildings) and yield losses in agriculture (e.g. the coypu, which harms crops);
- An **ecological** problem: invasive alien species can seriously damage ecosystems and cause extinctions of species which are needed to maintain the balance of our natural environment. Black cherry for example is seriously disturbing forest ecosystems and grey squirrels are outcompeting red squirrels. After habitat loss, invasive alien species are the second largest cause of biodiversity loss in the world;
- A **policy** problem: many Member States are already having to spend considerable resources in dealing with this problem, but their efforts are not effective if they are dealt with purely on a national basis. The Giant hogweed eradication campaign in Belgium, for example, will be undermined if the species reinvades from France.

Environment Commissioner Janez Potočnik said: *"Combating invasive alien species is a prime example of an area where Europe is better when working together. The legislation we are proposing will help protect biodiversity and is targeted to allow us to focus on the most serious threats. This will help improve the effectiveness of national measures and achieve results in the most cost-effective way. I look forward to working with Member States and the European Parliament to put this legislation in place and step up our efforts to tackle this serious problem right across Europe."*

The proposal centres round a **list of invasive alien species of Union concern**, which will be drawn up with the Member States using risk assessments and scientific evidence. Selected species will be banned from the EU, meaning it will not be possible to import, buy, use, release or sell them. Special measures will be taken to deal with issues arising for traders, breeders or pet owners in the transitional period.

The proposal is for three types of intervention:

- **Prevention:** Member States will organise checks to prevent the intentional introduction of species of concern. However many species come into the EU unintentionally, as a contaminant in goods or trapped in containers. Member States will have to take action to spot such pathways and take corrective measures.



IP/13/818

- **Early warning and rapid response:** when Member States detect a species of Union concern that is becoming established, they will take immediate action to eradicate it.
- **Management** of established invasive alien species of concern: if species of Union concern are already widely spread, Member States will need to put in place measures to minimise the harm they cause.

The proposal encourages a shift towards a harmonized and more preventive approach, increasing efficiency and lowering damage costs and the cost of action over time.

Next Steps

The proposed Regulation will now be examined by the Council and the Parliament. Member States will be fully involved in compiling the list and can propose candidates for listing. The regime will be coupled with an information support mechanism: the European Alien Species Information Network (<http://easin.jrc.ec.europa.eu/>).

Background

Alien species invasions in Europe are expected to further increase as a result of the rising volume and extent of trade and travel, which will see more species transported around the globe.

The Regulation on the prevention and management of invasive alien species draws on the EU's Resource Efficiency Roadmap and the EU Biodiversity Strategy to 2020.

For more information:

http://ec.europa.eu/environment/nature/invasivealien/index_en.htm

Audiovisual material can be downloaded from tvlink.org

[MEMO/13/769](#)

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Annex B: Letter from Chair of the Association to Food Standards Agency

Menai Strait Fishery Order Management Association

Port Penrhyn, Bangor, LL57 4HN

Jayne Griffiths
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23rd May 2013

Dear Jayne

Re: CEFAS Discussion paper on live bivalve molluscs (LBM) and human enteric virus contamination: options for improving risk management in EU food hygiene package

The Menai Strait Fishery Order Management Association (MSFOMA) was established in 2010 when the management of The Menai Strait Oyster and Mussel Fishery Order 1962, formerly under the North Western and North Wales Sea Fisheries Committee was no longer appropriate after staff were moved into Welsh Government. We are writing to you to raise our concerns over the proposals that have been put forward in the CEFAS discussion paper on live bivalve molluscs (LBM) and human enteric virus (norovirus and hepatitis A) contamination. This paper was requested by DG Sanco of the European Commission and will be discussed at a restricted Member States working group meeting.

It is our opinion that any proposal for setting virus standards, and in particular norovirus, for LBMs entering the food chain and for LBM production areas is inappropriate at this time for the reasons outlined below. If virus standards were to be introduced, then the future of the LBM industry in Wales and the rest of the UK will be under severe threat, with the closure of many businesses with the knock-on impact on local communities, local markets and export markets. In 2010, the estimated first sale value of LBMs in Wales and the UK was £6.1 million and £25.5 million respectively (CEFAS Shellfish News, spring 2012).

UK producers work very hard to make sure that LBMs do not pose a risk to public health and are extremely concerned about the proposals put forward in the discussion paper. They need reassurance that there is a future in producing LBMs in order to have the confidence to invest in further development. MSFOMA is seeking your support by asking you to raise our concerns at the highest level and request that the industry is given the time to respond to any consultation on this issue, an issue that will have a devastating effect on producers and UK molluscan shellfish production.

Reasons why it is too soon to set viral standards

1. Currently PCR analytical techniques (the recommended method for measuring the level of norovirus) cannot differentiate between infectious (live) and non-infectious (dead) norovirus. Therefore, in our opinion, effective legislative controls to protect public health should not be based on what is still a developing methodology. It is imperative that the methodology is able to identify infectious versus non-infectious virus.

2. Since it is impossible to differentiate between infectious and non-infectious norovirus (copies/g) at the moment, it is too soon to set viral standards for LBMs going on to the market or for production areas (as is being proposed in the discussion paper). We should have a robust methodology in place to ensure achievable and affordable limits for norovirus contamination are set at the outset, both for the benefit of the LBM grower and the Competent Authority.

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3. Norovirus contamination measured by PCR methods is only an indication of risk and not a true measure of the real risk to UK public health from consuming LBMs. We need to put a figure on the real risk to public health from LBMs. The CEFAS discussion paper does not present any statistical data on the current risk to public health from LBMs or present any cost benefit analysis of introducing an 'Official Control virus programme'. Norovirus is widespread in the human population. Outbreaks of gastroenteritis can be caused by the consumption of food and water contaminated with faecal material but is also transmitted through person to person contact and contact with infected surfaces. We believe that the risk to public health through the consumption of LBMs is being considered disproportionately to these other methods of infection and in relation to the consumption of some other foodstuffs, eg salads and fruits.

4. In 2012, the European Food Safety Authority (EFSA) observed that PCR methods may overestimate health risk issues since they will detect both infectious (live) and non-infectious (dead) norovirus. No practical method for testing for virus viability is currently available or is likely to be available in the medium term (i.e. next 5 years). EFSA also observed that the ratio of infectious to non-infectious virus particles detected is likely to vary from sample to sample depending on the impact of the environmental conditions encountered. We have concerns that this could lead to 'false positives' in the results with consequential impacts on producers and their viability.

In conclusion, if the viral standards as proposed were to be introduced, it would have a significant effect on shellfish businesses since they are established in areas where urbanisation has increasingly affected water quality (specifically bacteria and virus levels) and this is, and will remain beyond the control of the producer. Relaying LBMs is not a realistic option for UK growers because there are not enough Class A areas in which to relay and it would be cost-prohibitive to move them. Also, the majority of LBMs coming on to market (mussels, cockles, clams) will not pose a risk to public health since they are usually cooked. The LBMs that could pose a risk to public health are oysters and any future controls should be limited to them. However, increased depuration times are unlikely to be a practical option since they reduce quality of the product and add additional expense.

Yours sincerely

SUE UTTING
Chair, MSFOMA

Menai Strait Fisher Order Management Association
Company registered in England and Wales No 07163689

Annex C: Letter from Food Standards Agency to Interested Parties.



Dear Interested Party

30 July 2013

Norovirus in shellfish – an update on status of EU negotiations

Following my letter dated 08 May 2013 I would like to provide you with an update on the EU discussion on norovirus controls in shellfish.

The EU Commission gathered views from Member States at a Working Group meeting on 27th June 2013. Following detailed and constructive discussions, during which many different views were expressed, it was agreed that no limits should be set at this stage due to the limitations of the current methodology and the gaps in current knowledge about norovirus. However, it was agreed that there is a need to address food safety risks associated with norovirus in raw shellfish and the Commission, together with Member States, will continue to explore risk management options, identifying areas where harmonised practices could be introduced. There was also support for a harmonised EU baseline study, as recommended by EFSA, to help fill gaps in the data that have been identified.

The FSA is continuing to explore the feasibility and effectiveness of alternative approaches which could be applied, such as buffer zones and alert systems to facilitate active management of harvesting. I would welcome any evidence based information and/or suggestions in the coming months to inform these considerations.

Yours Sincerely

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