

Institute of Fisheries Management

response to

MMO MPA Fisheries Management Stage 3 Consultation

September 2025

Introduction

Established in 1969 in the UK, the Institute of Fisheries Management (IFM) is dedicated to the advancement of sustainable fisheries management. We are a non-profit organisation controlled by members and managed by an elected council.

Our members are fisheries managers from regulatory and research bodies, fishing and angling organisations, water companies, fish farms and educational institutions. We have branches in the UK and offer training, including fish surveys, a Diploma in Fisheries Management and, commencing soon, a Marine Diploma. We organise many events throughout the year, from national conferences to small branch visits.

In our policy work, we aim to reflect what the policy team considers is the best management approach for the long-term health of our fish stocks and the ecosystems on which they depend. We are also members of [Wildlife & Countryside Link](#) and support their response to this consultation.

Overview

The Institute for Fisheries Management strongly welcomes the Marine Management Organisation (MMO) taking the necessary steps to further manage fishing in all offshore benthic Marine Protected Areas (MPAs) around England. We fully support the four regional sea byelaws to manage these 42 MPAs. We strongly agree that bottom trawling is incompatible with maintaining site integrity and/or the conservation objectives of the sites, and that byelaws are necessary to prohibit this activity and prevent further damage to the sites.

At the same time as supporting these proposals, we are concerned that the government is still taking a feature-based approach rather than a whole-site approach, and we request the latter for the three sites where whole-site protection is not proposed. We also recommend that all industrial fishing is banned from the MPAs, i.e. pelagic trawlers, in addition to bottom-trawlers and dredgers, as industrial fishing is incompatible with the aims of MPAs¹.

We are keen that the MPAs are protected to meet marine conservation aims as well as implement relevant legislation and policies. Including:

- Marine and Coastal Access Act 2009;
- Offshore Marine Habitats and Species Regulations 2017);
- Conservation of Habitats and Species Regulations 2017; Fisheries Act 2020;
- Marine Strategy Regulations 2010; and
- United Nations Convention on Biological Diversity (CBD) 30 by 30 commitment.²

¹ <https://www.iucncongress2020.org/motion/066> RECOGNISING that 'industrial fishing' activities can be identified by variables including the capacity and size of vessels and the method and volume of fish extraction, and that in the context of protected areas, 'industrial fishing' is defined here as (>12 m long x 6 m wide) motorised vessels, with a capacity of >50 kg catch/voyage, requiring substantial sums for their construction, maintenance, and operation and mostly sold commercially, and that all fishing using trawling gears that are dragged or towed across the seafloor or through the water column, and fishing using purse seines and large longlines, is defined as industrial fishing.

² The ecosystem approach is referenced in numerous decisions of the parties to the CBD - see Decision II/8 (1995) (para 1) as affirmed by Decision V/6, Annex, Principles 5–6 and Decision VIII/24.

Response to MMO consultation questions

1. Do you have any additional information about the location, condition, or sensitivity of the designated features?

The IFM does not have data on the **location** of designated features in offshore MPAs. However, regardless of the exact location of individual features, we support the whole site approach, whereby MPAs are protected in their entirety and we note that case law also requires this.

Given the levels of bottom trawling in MPAs the **condition** of designated features is likely compromised. This is confirmed in the the MMO Stage 3 Fishing Gear Impacts Evidence: Bottom Towed Gear which provides an in-depth examination of the impacts of this activity on the primary features found in the offshore MPAs, supported by substantial evidence from research conducted by the JNCC and Natural England. It concludes that all features including sandbanks may be impacted. This makes it necessary for the conservation objectives to primarily be “restore/recover to favourable conservation status/condition”. Where the objective is to “maintain,” we recommend reconsideration given the fishing pressure.

The **sensitivity** of benthic habitats to bottom-towed gear is well documented (Sciberras et al. 2018; Cook et al. 2013; Obst et al. 2018; Josefson et al. 2018; Cartes et al. 2013; Otero et al. 2017), including the fact that first pass of bottom-towed gear on a biogenic reef is the most destructive³. The greatest impact in offshore shelf seas over the past 120 years has been the reduction of offshore shellfish and bivalve reefs to low-complexity shell, sand and gravel beds⁴, and other physical states by persistent trawling and dredging. The recovery time for seabed communities affected by bottom trawling has been estimated to be between 7.5 and 15 years after one single pass of a beam trawl (Pedersen et al. 2009).

2. Do you have information on the type, location, frequency, or intensity of fishing activity within the MPAs?

No, the IFM does not retain data on the type or location of fishing activity within the offshore MPAs. However, we think the MMO should consider the following data:

- European waters experience the highest levels of trawling globally—over 50% of their surface area is regularly affected, compared to a global average of 14% (Amoroso et al. 2018).
- Oceana analysis of Global Fishing Watch data found over 90% of offshore UK MPAs impacted by bottom trawling.⁵
- Greenpeace analysis of Global Fishing Watch data found supertrawlers spent 7,380 hours in UK MPAs from 2020-2025.⁶

We would also like the following observations noted:

- We are very concerned about the ongoing industrial fishing, especially bottom trawling, occurring in offshore MPAs and the fact that this has been permitted to continue, in most cases, unabated since these MPAs were designated, in contravention of the Marine Act and Offshore Habitats Regulations under which they were established. The continuation of such activity not only undermines conservation efforts and threatens the ecological integrity of these protected areas, impeding their intended purpose of safeguarding marine biodiversity and habitats.
- Regardless of whether fishing **frequency** or **intensity** within each MPA is high or low, the government has clear legal duties to prevent damaging fishing activities. This is crucial because studies have shown that even a single sweep of a bottom trawl can significantly reduce biodiversity and species richness. For example, research has demonstrated that a single bottom trawl pass can

³ Cook R., Farinas-Franco J.M, Gell F.R., Holt, R.H. Lindenbaum C. (and 5 others) (2013). The substantial first impact of bottom fishing on rare biodiversity hotspots: A dilemma for evidence-based conservation. PLoS 1 8(8): e69904.

⁴ Thurstan R.H., Hawkins J.P., Raby L. & C.M. Roberts (2013). Oyster (*Ostrea edulis*) extirpation and ecosystem transformation in the Firth of Forth, Scotland. J Nature Cons 21(5): 253-261. <https://doi.org/10.1016/j.jnc.2013.01.004>

⁵ [Fishing industry still ‘bulldozing’ seabed in 90% of UK marine protected areas | Fishing industry | The Guardian](#)

⁶ [Supertrawlers spent 7,380 hours fishing in UK Marine Protected Areas each year since Brexit - Greenpeace UK](#)

reduce benthic invertebrate abundance by 26% and species richness by 19%, highlighting the immediate and substantial ecological impact of such activities^{7, 8}.

- We therefore very much welcome the proposed management measures (see answer to Q 3).
- However, we think all industrial fishing should be managed across the MPAs ie all pelagic trawlers and fishers over 12m in addition to bottom trawlers. We believe that the MMO will have access to data on all industrial trawling, and this additional activity, not least the super trawlers, should be prohibited across all MPAs, including Harbour porpoise sites, during Stage IV (see Q.3).

3. Do you agree or disagree with the proposed management measures? Do you have any suggestions for other management measures?

- The IFM firmly agrees with and strongly welcomes the proposed management measures for the 42 offshore MPAs to close the MPAs to bottom-towed gear, through four regional byelaws.
- The proposed byelaws are essential to protect and restore our seas, to meet the conservation objectives of the MPAs and to implement national and international policies and laws on marine conservation.
- For too long, England's offshore marine environment has suffered from a lack of a well-managed MPA network, with bottom trawling being permitted throughout. This has resulted in damage, degradation and in some instances destruction of the MPA habitats – some rare and some representative.⁹ Bottom-trawling also disturbs organic carbon within seafloor sediments and reduces habitat's ability to sequester and store carbon.¹⁰
- The MMO is therefore correct to conclude that demersal trawls or dredges are not compatible with the conservation objectives of the site and/or achieving site integrity.

These measures are long overdue and essential to meet various national and international law including:

- Marine and Coastal Access Act 2009;
- Offshore Marine Habitats and Species Regulations 2017);
- Conservation of Habitats and Species Regulations 2017; Fisheries Act 2020;
- Marine Strategy Regulations 2010; and
- United Nations Convention on Biological Diversity (CBD) 30 by 30 commitment.¹¹

There are three MPAs, however (one new measure and two byelaws being incorporated from Tranche 2/3), that only cover part of the site, rather than the whole site and one MPA where no byelaws are proposed. It is the IFM view that to ensure site integrity under the Habitats Regulations and achieve the conservation objectives under the Marine Act, the entire MPA should be protected from bottom trawling and industrial fishing. The sites we have concerns about in stage 3 are:

- North Sea byelaw: Inner Dowsing, Race Bank & North Ridge SAC – the closed trawl area byelaw for this SAC continues to only cover about half of the SAC, with tight boundaries around the sandbank and reef features, giving no opportunity for them to expand, even though abrasion and trawling are identified as the main threats to this reef species.¹²
- East Channel byelaw: Beachy Head East, where a small area of subtidal coarse sediment in the SE corner seems to have been excluded in the map, from the trawling ban, for no clear reason.
- Western Channel byelaw: The Canyons MCZ, where about 1/5th of the MCZ is not protected from bottom trawling, likely due to it not being possible to trawl this deep-sea location, but

⁷ Sciberras, M, Hiddink, JG, Jennings, S, Szostek, CL, Hughes, KM, Kneafsey, B, Clarke, LJ, Ellis, N, Rijnsdorp, AD, McConnaughey, RA, Hilborn, R, Collie, JS, Pitcher, CR, Amoroso, RO, Parma, AM, Suuronen, P & Kaiser, MJ 2018, 'Response of benthic fauna to experimental bottom fishing: A global meta analysis', Fish and Fisheries, vol. 19, no. 4, pp. 698-715. <https://doi.org/10.1111/faf.12283>

⁸ <https://scotlandsnature.blog/2017/05/19/snh-divers-assess-loch-carron-flame-shell-bed-damage/>

⁹ Dureuil et al., Science 362, 1403-1407. 2018. Elevated trawling inside protected areas undermines conservation outcomes in a global fishing hot spot. <https://www.science.org/doi/10.1126/science.aau0561>

¹⁰ Sala et al., Nature 592, 397-402. 2021. Protecting the global ocean for biodiversity, food and climate. <https://www.nature.com/articles/s41586-021-03371-z.epdf>

¹¹ The ecosystem approach is referenced in numerous decisions of the parties to the CBD - see Decision II/8 (1995) (para 1) as affirmed by Decision V/6, Annex, Principles 5-6 and Decision VIII/24.

¹² OSPAR. 2013. Background Document for Sabellaria spinulosa reefs. <https://www.ospar.org/documents?v=7342>

given it is within the site and a deep-sea feature, it should still be included, for simplicity and to adhere to the legal process that licensing damaging activities in MPAs should not be permitted.

- Land's End and Cape Bank MPA has no management measures proposed by the MMO. As this is an area of rocky reef no bottom trawling is undertaken, but there is still fishing with anchored nets and lines, which the MMO concluded does not adversely affect the site. While this may be the case for smaller vessels, large vessels exceeding 12 metres are considered industrial fishing by the IUCN and should be prohibited (see below).
- We have concerns that not all other industrial fishing is covered by the byelaws, and we call for all industrial trawlers to be banned from fishing in the MPAs, as we agree with the IUCN position that no industrial fishing should take place inside MPAs.¹³ It further defines industrial fishing in this context as all fishing vessels over 12 metres in length and/or that tow gear across the seafloor.¹⁴

The UK is internationally obligated to protect marine environments under agreements like the UN Convention on Biological Diversity. With the global "30 by 30" commitment, the UK must safeguard 30% of its seas. As a leader in marine protection and founder of the Global Ocean Alliance, the UK should protect its MPAs from all industrial fishing and work to protect 30% of its offshore zone accordingly, whether through Tranche IV or new designations and byelaws to reach 30%.

4. How would the proposed management option affect you? Or those you represent?

The Institute of Fisheries Management welcomes the proposed byelaws to ensure that the damaging activity of bottom trawling is halted in all the offshore MPAs and urges swift adoption and enforcement, enabling their ecological recovery and ensuring that conservation objectives are fully achieved.

Our members will welcome the conservation measures and the UK's work to improve sustainable fisheries management in our seas, for the benefit of biodiversity including fish stocks, recreation, and ecosystem services, particularly in terms of climate mitigation. Fishers will ultimately benefit through the rebuilding of sustainable wild fish harvest opportunities.

We are commencing a marine diploma course and would hope in the future to use the UK, as a leading example in marine conservation, demonstrating to students how effective policy implementation can drive meaningful environmental change once these byelaws are enacted and enforced.

5. What impacts, if any, do you anticipate the proposed management measures will have on UK fishing vessels, operators, or supply chains?

According to the MMO and Defra's 2023 impact assessment, the estimated benefits of closures are valued at several billion pounds, which is higher than the estimated impacts to fishers and operators of several million pounds. While it is important to consider the effects on fishers, potential benefits include increased fish stocks, improved water quality through more effective nutrient cycling, and contributions to climate regulation by preserving marine habitats that store organic carbon. Even if costs have been underestimated, it is clear that the benefits would greatly likely exceed the financial impacts on fishers and operators.

6. What impacts, if any, do you anticipate the proposed management measures will have on non-UK fishing vessels, operators, or supply chains (including those from the EU)?

¹³ <https://www.iucncongress2020.org/motion/066> RECOGNISING that 'industrial fishing' activities can be identified by variables including the capacity and size of vessels and the method and volume of fish extraction, and that in the context of protected areas, 'industrial fishing' is defined here as (>12 m long x 6 m wide) motorised vessels, with a capacity of >50 kg catch/voyage, requiring substantial sums for their construction, maintenance, and operation and mostly sold commercially, and that all fishing using trawling gears that are dragged or towed across the seafloor or through the water column, and fishing using purse seines and large longlines, is defined as industrial fishing.

As stated in response to Q5.

According to the MMO and Defra's 2023 impact assessment, the estimated benefits of closures are valued at several billion pounds, which is higher than the estimated impacts to fishers and operators of several million pounds. While it is important to consider the short term effects on fishers, potential benefits include increased fish stocks, improved water quality through more effective nutrient cycling, and contributions to climate regulation by preserving marine habitats that store organic carbon. Even if costs have been underestimated, the available evidence suggests that the benefits would likely exceed the financial impacts on fishers and operators.

7. What other impacts could the proposed management measures have? For example, on fishers, the wider fishing community, coastal communities, employment, upstream and downstream supply chains, people with protected characteristics under the Equality Act 2010, fish stocks, and the marine environment.

- The proposed management measures will have positive effects on England's regional sea ecosystems and beyond, enabling a proportion of our rare, threatened or representative habitats to recover from many decades of trawling. This will increase biodiversity and the complexity of the sites and wider ecosystems.
- Permitting bottom trawling in MPAs harms marine habitats that the MPAs are supposed to protect¹⁵ and can also disturb organic carbon within seafloor sediments¹⁶ and reduce carbon sequestration.
- The sensitivity of benthic habitats to bottom-towed gear is well documented (Sciberras et al. 2018; Cook et al. 2013; Obst et al. 2018; Josefson et al. 2018; Cartes et al. 2013; Otero et al. 2017), including the fact that first pass of bottom-towed gear on a biogenic reef is the most destructive¹⁷. The greatest impact in offshore shelf seas over the past 120 years has been the reduction of offshore shellfish and bivalve reefs to low-complexity shell, sand and gravel beds¹⁸, and other physical states by persistent trawling and dredging. The recovery time for seabed communities affected by bottom trawling has been estimated to be between 7.5 and 15 years after one single pass of a beam trawl (Pedersen et al. 2009).
- The condition of designated features is likely compromised, as European waters experience the highest levels of trawling globally—over 50% of their surface area is regularly affected, compared to a global average of 14% (Amoroso et al. 2018). Most Marine Protected Area (MPA) features are impacted and require restoration or recovery, making objectives to “restore/recover to favourable conservation status/condition” essential in most MPAs.
- Restoring these habitats provides broad ecosystem benefits, as shown in the MMO Stage 3 De Minimis Assessment. Improved environmental health supports fish stocks, food security, tourism, nutrient cycling, waste bioremediation, and climate regulation. We welcome work to estimate the benefit over 20 years and note it is around £3.1 billion compared to a net cost of £7.8 million for UK businesses and public bodies. Likewise the report *Valuing the Benefits of Designating a Scottish Network of MPAs in Territorial and Offshore Waters (2012)*¹⁹ found the MPAs could provide benefits to Scotland to the tune of £10 billion.
- The measures will also result in the UK implementing the law with regard to bottom trawling in MPAs under the Marine and Coastal Access Act 2009; Offshore Marine Habitats and Species Regulations 2017) and Conservation of Habitats and Species Regulations 2017; and Fisheries Act 2020. It will also mark an important step to start to work towards seafloor integrity under the Marine

¹⁵ Dureuil et al., *Science* 362, 1403-1407. 2018. Elevated trawling inside protected areas undermines conservation outcomes in a global fishing hot spot. <https://www.science.org/doi/10.1126/science.aau0561>

¹⁶ Sala et al., *Nature* 592, 397-402. 2021. Protecting the global ocean for biodiversity, food and climate. <https://www.nature.com/articles/s41586-021-03371-z.epdf>

¹⁷ Cook R., Farinas-Franco J.M, Gell F.R., Holt, R.H. Lindenbaum C. (and 5 others) (2013). The substantial first impact of bottom fishing on rare biodiversity hotspots: A dilemma for evidence-based conservation. *PLoS* 1 8(8): e69904.

¹⁸ Thurstan R.H., Hawkins J.P., Raby L. & C.M. Roberts (2013). Oyster (*Ostrea edulis*) extirpation and ecosystem transformation in the Firth of Forth, Scotland. *J Nature Cons* 21(5): 253-261. <https://doi.org/10.1016/j.jnc.2013.01.004>

¹⁹ [Valuing the Benefits of Designating a Scottish Network of MPAs in Territorial and Offshore Waters \(2012\)](#)

Strategy Regulations 2010 and contribute to Good Environmental Status, which the UK is far behind on achieving. The OEP has recently concluded an investigation into the UK's failure to achieve GES by 2020 and is seeking accountability and a timebound plan to achieve GES.²⁰

- Progress towards 30 by 30: Now there is an international commitment to 30 by 30 under the United Nations Convention on Biological Diversity (CBD) there is a global obligation as well as national to protect 30% of our seas. These measures, once implemented will put the UK Government in good stead to lead by example, which they ought to do as lead partners in the Global Ocean Alliance,

²⁰ [OEP identifies possible failures to comply with environmental law over marine target | Office for Environmental Protection](#)