



Department
for Environment,
Food & Rural Affairs

Consultation outcome

Summary of responses

Updated 31 January 2024

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Foreword

Defra ran a public consultation from 7 March 2023 to 30 May 2023 to gather views on the management measures of industrial sandeel fishing in English waters of the North Sea. Defra asked for views on the proposed management measures and the impacts of these potential measures.

This document gives a summary of responses to the consultation. The analysis given in this summary is based on the responses to the consultation via Citizen Space and via email correspondents. However, we have also considered all views expressed in discussions, emails and petitions towards the consultation.

Overview

Background

Sandeels are an important forage fish providing an essential source of food for marine species. Recognising the importance of sandeels, with Ministerial approval, a call for evidence in 2021 was completed by Defra. The evidence highlighted the need for future additional sandeel management measures to protect the marine environment. Defra then requested an advice report by expert scientists in 2022 on ecosystem risks and benefits of full prohibition of industrial sandeel fishing in the UK waters of the North Sea. The [evidence report on the ecosystem impacts from industrial sandeel fishing](https://www.gov.uk/government/publications/evidence-report-on-the-ecosystem-impacts-from-industrial-sandeel-fishing) (<https://www.gov.uk/government/publications/evidence-report-on-the-ecosystem-impacts-from-industrial-sandeel-fishing>) was published alongside the consultation on 7 March.

Now Defra have consulted on spatial management measures for industrial sandeel fishing in English waters of the North Sea. The proposed management measures would allow for:

- the protection of sandeel stocks, the wider marine environment
- increased resilience for key sandeel predators such as seabirds, commercially valuable fish and marine mammals

Defra consulted on 3 management measures that could increase the resilience of sandeel stocks and the wider ecosystem within English waters of the North Sea. The options were:

1. Full closure of English waters within the North Sea. This option would see full closure of industrial sandeel fishing within the English waters of SA1r, SA3r and SA4.
2. Closure of English waters within SA4 and SA3r. This option would be a partial closure in English waters, with industrial fishing prohibited in English areas of SA4 and SA3r.
3. Closure of English waters within SA1r. This option would be a partial closure in English waters, with industrial fishing prohibited in English area of SA1r.

Reponses

The consultation received 340 responses during the consultation period. The majority of responses (329) were received through the online portal of Citizen Space. In addition to the consultation responses, we received 11 email responses. There was a range of representatives including environmental non-governmental organisation (e-NGOs), commercial fishing companies and members of the public (table 1).

Further to this, we received over 32,000 co-ordinated emails from members of the Royal Society of the Protection of Birds (RSPB) and a Greenpeace petition attained 138,890 signatures. Whilst these are not responses to the online consultation survey, we acknowledge their participation and views. Annex 1 includes a full list of respondents.

We are grateful to everyone who took the time to respond and share their views, suggestions, and experiences on the matter. All responses were considered in the analysis of the consultation and will be considered in a future government response.

Table 1: Consultation responses categorised into type of respondent, collated from Citizen Space and email responses (Annex 1 includes a full list of respondents).

Type of respondent	Quantity
Members of the public or other (including private individuals and other organisations)	268
Trusts and organisations (including trusts, networks, groups and eNGOs)	53
Fishing industry and commercial (including individuals, representatives and companies involved in the fishing	13

Type of respondent	Quantity
industry)	
International institutions	2
Academics or research bodies (including individuals and research bodies of academic accreditation)	4

Methodology

The questions in the consultation were analysed with both a quantitative and qualitative assessment. Questions 1, 4, and 8 followed a yes, no or unanswered response for a simple percentage of answers. All other questions required a methodological qualitative analysis for which a thematic analysis was used.

A thematic analysis uses the qualitative data, in this case the consultation responses, to identify and interpret patterns or themes within the text. These themes can be quantified by counting the number of references within all answers provided. Each theme was only recorded as one reference per answer, annex 2 includes the themes identified for each question. These are marked in quotation marks in the summary of responses. This went through a quality assurance process internally on a random selection basis.

Highlight

Following a 12-week consultation period, a total of 340 responses were recorded:

- 329 responses to the online survey on Citizen Space
- 11 responses by email

The consultation consisted of 3 overarching question themes aligned with the spatial areas:

1. Full closure.
2. Partial closure.
3. Further views.

There were 14 questions asking for views and suggestions on the potential management measures. Over 50% of respondents answered each question.

Over 95.5% of respondents submitted agreement toward full spatial closure. Key themes identified as to why there should be a full closure included to “protect the seabirds”, “protecting marine wildlife” and “concerns of displacement fishing from partial closures”. The support towards full closure was evident throughout all questions with the key themes continuing throughout.

Summary of responses by question

Questions 1 to 4: Full closure of English waters within the North Sea

Questions 1 to 4 asked whether the respondent agreed or not with an approach of full closure of industrial fishing within the North Sea, further asking for an explanation as to why they do, or do not, support this measure. Additionally, questions sought their views on benefits and negative impacts of this measure. Find the full answers to each question in annex 2.

All respondents submitted a response to question 1. 314 (95.5%) submitted agreement to the approach of full spatial closure of industrial sandeel fishing within the North Sea, with 10 (3%) submitting disagreement and 5 (1.5%) not submitting an answer. 302 (91.7%) respondents submitted a response to question 2 to expand on their reasoning of support or no support towards full closure. The two main reasons identified were “protecting the seabirds” (41.9%) and “supporting the marine wildlife that depend on sandeels” (35%). Other answers with lower percentages were given such as “full closure to prevent displacement”, “threats from climate change” and “meeting environmental targets”.

Of the ‘no’ and ‘unanswered’ responses the justifications included proposing non-spatial measures and preferring partial closure as in questions 5 to 12. However, 2 of the ‘no’ were determined to be unjustified as the reasons given show clear support for a full closure.

295 (89.7%) respondents submitted a response to question 3. The main themes giving a reason of benefit were “protecting the seabirds” (32.9%) and “the importance of sandeels in the food web” (21.9%). Some of the less

common themes were that full closure could “avoid displacement”, and the “impact from offshore windfarms”.

280 (85.1%) respondents submitted a response to question 4. The main themes identified for the negative benefits were “none” (30.3%), followed by “low impact on industrial fishing companies” (17%) and “financial impact” (13.3%). Of lesser concern were “livelihood of fishermen”, “enforcement of the ban” and “potential friction with other fishing nations”.

In addition to the responses recorded on citizen space, 6 email responses to the consultation were in favour of full spatial closure and 5 emails were in disagreement to full spatial closure. The reasons cited in these emails generally follow the themes identified for the “reasons for supporting a full closure” and the “negative benefits” highlighted above.

Although not direct replies to the consultation survey, the RSPB petition with over 32,000 signatures and the Greenpeace petition with 138,890 signatures were both in favour of full spatial closure.

Questions 5 to 8: Partial closure of English waters within SA4 and SA3r in the North Sea

Questions 5 to 8 asked whether the respondent agreed or not with an approach of partial closure of industrial fishing within SA4 and SA3r in the North Sea, further asking for an explanation as to why they do, or do not, support this measure. Additionally, questions sought for their views on benefits and negative impacts of this measure. Find the full answers to each question in annex 2.

All respondents submitted a response to question 5. 84 (25.5%) submitted agreement to the approach of partial spatial closure of industrial sandeel fishing within the North Sea, with 213 (64.7%) submitting disagreement and 32 (9.7%) not submitting an answer. Of the ‘disagree’ and ‘unanswered’ responses, 82% of the expanded answers from question 6 indicated that full closure was preferred.

251 (76.3%) respondents submitted a response to question 6 to expand on their reasoning of support or no support towards partial closure. The two main reasons were “full closure preferred” (39.4%) and “insufficient protection to marine environment” (30.3%). Other answers with lower percentages were given such as “partial closure could lead to displacement” and “harder to enforce”.

207 (62.9%) respondents submitted a response to question 7. The main themes giving a reason of benefit to partial closure were “prefer full closure”

(23.5%) and “limited benefits with partial closure” (19.6%). Other themes included that partial closure would have “concern of displacement fishing” and “protecting sandeel stocks”.

203 (61.7%) respondents submitted a response to question 8. The main themes identified for the negative benefits were “none” (35.1%), followed by “concerns of displacement fishing” (22.8%) and “less benefit than full closure” (12.7%). Other negative impacts were identified as “reduction in livelihoods” and “harder to monitor”.

Although not responses to the consultation survey, 6 of the email responses were in favour of partial spatial closure and 5 in disagreement to partial spatial closure. The reasons cited in these emails generally follow the themes identified for the “reasons for supporting a full closure” and the “negative benefits” highlighted above.

Questions 9 to 12: Partial closure of English waters within SA1r in the North Sea

Questions 9 to 12 asked whether the respondent agreed or not with an approach of partial closure of industrial fishing within SA1r in the North Sea, further asking for an explanation as to why they do, or do not, support this measure. Additionally, questions sought for their views on benefits and negative impacts of this measure. Find the full answers to each question in annex 2.

All respondents submitted a response to question 9. 79 (24%) submitted agreement to the approach of partial spatial closure of industrial sandeel fishing within the North Sea, with 207 (62.9%) submitting disagreement and 43 (13%) not submitting an answer. Of the ‘disagree’ and ‘unanswered’ responses, 78.7% of the expanded answers from question 10 indicated that full closure was preferred.

230 (69.9%) respondents submitted a response to question 10 to expand on their reasoning of support or no support towards partial closure. The two main reasons were “full closure preferred” (53.1%) and “limited benefits” (25%). Other answers with lower percentages were given such as “concerns of displacement fishing” and “harder to enforce”.

196 (59.5%) respondents submitted a response to question 11. The main themes giving a reason of benefit to partial closure were “prefer full closure” (43%) and “limited benefits” (19.9%). Other themes included that partial closure would have “no benefits” and “concern of displacement fishing”.

197 (59.8%) respondents submitted a response to question 12. The main themes identified for the negative benefits were “none” (41.7%), followed by “concerns of displacement” (15.7%) and “insufficient protection for seabirds” (10.8%). Other negative impacts were “socio-economic challenges” and “harder to monitor”.

Although not answers to the consultation survey, 6 email responses disagreed to full closure, as well as partial closure. The reasons cited in these emails generally follow the themes identified for the “reasons for supporting a full closure” and the “negative benefits” highlighted above.

Questions 13 and 14: Further views

Questions 13 and 14 gave a chance for further views on the options and to give alternative management measures to the spatial measures proposed. Find the full answers to each question in annex 2.

On ranking the 3 proposed spatial measures, all respondents submitted a response for question 13a. 304 respondents (92.4%) submitted option 1 of full closure as their first preference, 3 respondents submitted option 2 as their first preference and 7 respondents submitted option 3 as first preference.

242 respondents submitted reasons for their preference choices, these included “prefer full closure” (68.6%) and “provide protection for seabirds” (12.6%). Other reasons included “importance of marine wildlife”, “avoiding displacement” and “considering livelihoods”.

All respondents submitted a response to question 14a. 209 respondents (63.5%) submitted agreement to the approach of using spatial measures. 65 respondents (19.7%) submitted disagreement and 55 (16.7%) did not submit an answer.

193 (58.6%) respondents submitted a reason to whether or not they support spatial measures. Although not answering the question directly, 39.3% of answers resubmitted the statement of preferring full closure. The reasons in support of spatial measures included “appropriate for sandeel protection” (24.9%), “effective enforcement” (11%) and “protect marine environment” (11%). Reasons for not supporting spatial measures were “difficulty to enforce effectively” (2.3%) and “concerns of displacement fishing” (1.3%).

The final question, 14c, asked for recommendations on alternative management measures not covered within the consultation. 166 (50.5%) respondents submitted an answer to this. 54.5% stated there was no alternative management measures. 23.1% suggested a full ban across all

waters of the North Sea. Other suggestions were to “include Scottish and Welsh waters”, “introducing fines”, and “changes in fishing equipment”.

Annex 1: List of organisations that responded to the consultation

List of respondents from Citizen Space and email responses.

Members of the public and other

Including private individuals and other organisations.

- Baines Wilson LLP
- Boston Spa, Wetherby & Villages Community Green Group
- New Meaning Foundation
- NHS
- Parish Council Member
- Pro Sales Solutions
- PTFA (Parent, Teacher and Friends Assc.)
- Satellite Applications Catapult
- Scottish Wildlife Trust (individual member)
- Second City Ventures Limited
- Stanhill Capital Ltd
- Wildlife Trusts (individual member)

Trusts and organisations

Including trusts, eNGOs, and networks

- AAC
- All About the Bass
- Ammonite Limited
- Angling Trust
- Bass Angling Conservation
- BASS (Bass Anglers Sportfishing Society)

- Blue Marine Foundation
- British Divers Marine Life Rescue
- Country Eye
- CVCP (Cline Valley Country Park)
- EAA (European Anglers Alliance)
- Conservation Association)
- Essex Wildlife Trust
- Friends of Par Beach
- Geoff Carr Ecology
- Greenpeace UK
- Heart of Argyll Wildlife Organisation
- Kent Ornithological Society
- Knapman Partnership
- Marine Conservation Society
- Natural England
- Northumberland IFCA (Inshore Fisheries National Trust
- Oceana
- Orvis
- PBSBAC (Pool Bay Small Boat Angling Club)
- Property Industry Flyfishers
- Purbeck Safari
- Reading and District Natural History Society and Reading Climate Action Network
- RSPB
- SCAC (South Cerney Angling Club)
- Seal Research Trust
- Sedbergh Angling Association
- Shark Trust
- St. Mary's Island Wildlife Conservation Society
- The Natural World
- The Pew Charitable Trusts
- The Seabird Group
- The Summer Camps Trust
- West Wales Rivers Trust
- Whale and Dolphin Conservation
- Wildfish
- World Wildlife Trust

Including a joint response from:

- Bird Life Finland
- Bird Life International
- Bird Life Sverige
- Bird Watch Ireland
- ClientEarth
- Fuglavernd
- Natur & Æmwelt
- SEO Birdlife
- SPEA (Sociedade Portuguesa para a Estudo das Aves)
- The Fisheries Secretariat
- Vogelbescherming Nederland

Fishing industry and commercial

including individuals, representatives and companies involved in the fishing industry

- A commercial fisherman
- Danish Fishers Producers Organisation
- Energy UK
- European Fishmeal and Fish Oil Producers
- Fishmonger
- Freight
- Marine Ingredients Denmark
- Offshore Wind Industry Council
- Outer Dowsing Offshore Wind
- Scottish Pelagic Fishermen's Association
- SSE Renewables
- Scottish Fishing Company
- Whitby commercial fishing Association

International institutions

- Danish Ministry for Food, Agriculture and Fisheries
- European Commission

Academics and research bodies

Including individuals and research bodies of academic accreditation

- Marine Biological Association of the UK
- University of Gloucestershire
- University of Manchester
- University of Oxford

Annex 2: Answers to each individual question

Q1. Do you agree with this approach of full closure of industrial sandeel fishing within the North Sea?

Table 2: Citizen space responses to Question 1.

Answer	Number of responses	Percentage of responses
Agree	314	95.44%
Disagree	10	3.04%
Unanswered	5	1.52%

Q2. Please expand on your answer by providing why you support this option, or why you do not support this option?

Table 3: Citizen space responses to Question 2 by themes identified.

Theme of answer	Percentage of responses
Protecting the seabirds	30.0%

Theme of answer	Percentage of responses
Marine wildlife depends on sandeels	25.1%
Ecological and environmental benefit	9.6%
Protecting sandeel stocks	9.2%
Full closure to prevent displacement	8.9%
Understanding of climate change threats	6.8%
Negative effects on marine environment	4.0%
Support commercially valuable fish	2.3%
Meeting Good Environmental Status targets	1.9%
Mitigate offshore wind	1.6%
Full ban is easier to monitor	0.5%

Q3. What do you see are the benefits of full closure of industrial sandeel fishing in English waters within the North Sea?

Table 4: Citizen space responses to Question 3 by themes identified.

Theme of answer	Percentage of responses
Protecting the seabirds	32.9%
Ecological importance in food web	21.9%
Protecting sandeel stocks	8.7%
Recognising climate change threats	8.4%
Supporting larger fish stocks	7.2%
Saving biodiversity of marine species	7.2%
Increase UK's nature-based tourism	3.6%

Theme of answer	Percentage of responses
Meeting Good Environmental Status targets	3.1%
Avoiding displacement	2.4%
Mitigate offshore windfarms	1.9%
No benefits to current measures	1.4%
Enable an effective assessment	1.3%

Q4. What do you see are the negative impacts of full closure of industrial sandeel fishing in English waters within the North Sea?

Table 5: Citizen space responses to Question 4 by themes identified.

Theme of answer	Percentage of responses
None	30.3%
Low level impact on industry	17.0%
Financial losses	13.3%
Value nature over industry progression	11.0%
Displacement to non-English waters	8.4%
Recognise compensatory work	5.5%
Targeting other species	5.5%
Job losses	2.9%
Friction with other fishing nations	2.3%
Difficulty to effectively enforce ban	1.4%
More impact on industry than environment	1.2%
Negatively impacting livelihood	0.9%

Theme of answer	Percentage of responses
Important for farming methods	0.6%

Q5. Do you agree with this approach to close SA4 and SA3r of industrial sandeel fishing in the North Sea?

Table 6: Citizen space responses to Question 5.

Answer	Number of responses	Percentage of responses
Agree	84	25.53%
Disagree	213	64.74%
Unanswered	32	9.73%

Q6. Please expand on your answer providing why you support this option, or why you do not support this option?

Table 7: Citizen space responses to Question 6 by themes identified.

Theme of answer	Percentage of responses
Prefer full closure	39.4%
Insufficient protection to marine environment	30.3%
Concerns of displacement fishing	16.3%
Any closure better than no closure	10.2%
Difficulty to enforce	1.1%
Concerns of targeting other species	1.1%
More than closure of English waters	0.8%

Theme of answer	Percentage of responses
Against closure of English waters	0.8%

Q7. What do you see are the benefits of full closure of industrial sandeel fishing in English waters within SA4 and SA3r in the North Sea?

Table 8: Citizen space responses to Question 7 by themes identified.

Theme of answer	Percentage of responses
Prefer full closure	23.5%
Limited benefits of partial closure	19.6%
Any closure better than no closure	15.2%
Environmental benefits	14.7%
None	9.3%
Protecting sandeel stocks	7.8%
Concerns of displacement fishing	2.9%
Protecting the seabirds	2.5%
Able to continue some fishing	1.5%
Difficult to effectively enforce	1.0%
No further benefits than current measures	1.0%
Less political impact	0.5%
Research and monitor area	0.5%

Q8. What do you see are the negative impacts of full closure of industrial sandeel fishing in English waters within SA4 and SA3r in the North Sea?

Table 9: Citizen space responses to Question 8 by themes identified.

Theme of answer	Percentage of responses
None	35.1%
Concerns of displacement fishing	22.8%
Less benefit than full closure	12.7%
Negative socio-economic impacts	9.2%
Reduction in livelihood	5.3%
Loss of wildlife	4.4%
Difficult to effectively enforce	3.5%
Targeting other species	3.1%
Won't achieve Good Environmental Status targets	2.2%
More impact on industry than marine environment	1.8%

Q9. Do you agree with this approach to close SA1r of industrial sandeel fishing in the North Sea?

Table 10: Citizen space responses to Question 9.

Answer	Number of responses	Percentage of responses
Agree	79	24.01%
Disagree	207	62.92%

Answer	Number of responses	Percentage of responses
Unanswered	43	13.07%

Q10. Please expand on your answer providing why you support this option, or why you do not support this option?

Table 11: Citizen space responses to Question 10 by themes identified.

Theme of answer	Percentage of responses
Full closure preferred	53.1%
Limited benefits	25.0%
Concerns of displacement fishing	14.0%
Protect the seabirds	3.5%
Any closure better than no closure	2.2%
Difficult to effectively enforce	0.9%
Protection of larger fish stocks	0.9%
Benefits for fishing industry	0.4%

Q11. What do see are the benefits of full closure of industrial sandeel fishing in English waters within SA1r in the North Sea?

Table 12: Citizen space responses to Question 11 by themes identified.

Theme of answer	Percentage of responses
Full closure preferred	43.0%

Theme of answer	Percentage of responses
Limited benefits	19.9%
Protecting species biodiversity	15.1%
None	14.0%
Concerns of displacement fishing	2.7%
Protecting the seabirds	2.2%
Less political impact	0.5%
Difficulty to effectively monitor	0.5%

Q12. What do you see are the negative impacts of full closure of industrial sandeel fishing in English waters within SA1r in the North Sea?

Table 13: Citizen space responses to Question 12 by themes identified.

Theme of answer	Percentage of responses
None	41.7%
Concerns of displacement fishing	15.7%
Insufficient to protect seabirds	10.8%
Negative socio-economic impacts	10.3%
Prefer full closure	8.3%
Minimal impact	3.4%
Difficult to effectively enforce	2.5%
Will not achieve targets	2.0%
More impact on industry than marine environment	2.0%

Theme of answer	Percentage of responses
Friction with other fishing nations	2.0%
Recognise compensatory work	1.0%
Prefer alternative measure to spatial closures	0.5%

Q13a. Please rank options 1, 2 and 3 by preference.

Table 14: Citizen space responses to Question 13a by preference rank.

Rank	Answer	Percentage of responses
1	Option 1	92.4%
2	Option 2	0.9%
3	Option 3	2.1%
Unanswered	N/A	4.6%

Q13b. Please provide reasoning for your choice of preference.

Table 15: Citizen space responses to Question 13b by themes identified.

Theme of answer	Percentage of responses
Prefer full closure	68.6%
Protect the seabirds	12.6%
Importance of marine ecosystem	4.0%
Close more than English waters	2.7%
To avoid displacement fishing	3.6%

Theme of answer	Percentage of responses
Protect sandeel stocks	2.2%
Meeting Good Environmental Status	2.2%
Considering livelihood of fisheries	1.3%
No ideal solution	0.9%
Difficulty to effectively enforce	0.9%
No measures wanted	0.9%

Q14a. Do you agree with using spatial management measures?

Table 16: Citizen space responses to Question 14a.

Answer	Number of responses	Percentage of responses
Agree	209	63.53%
Disagree	65	19.76%
Unanswered	55	16.72%

Q14b. Please provide reasoning for your view.

Table 17: Citizen space responses to Question 14b by themes identified.

Theme of answer	Percentage of responses
Full closure preferred	39.3%
Appropriate to achieve sandeel protection	24.9%
Protect marine environment	11.0%

Theme of answer	Percentage of responses
Able to effectively enforcement	11.0%
Unsure of effectiveness of alternative measures	3.5%
Protect the seabirds	2.9%
Against spatial measures	2.9%
Difficult to effectively enforce	2.3%
Concerns of displacement fishing	1.3%
Comprehensive monitoring	0.6%
Legislation or issuing	0.6%

Q14c. Are there alternative management measures that you would like to recommend that have not been put forward in this consultation?

Table 18: Citizen space responses to Question 14c by themes identified.

Theme of answer	Percentage of responses
No alternatives	54.5%
Complete ban on sandeel fishing	23.1%
Collaborate with other countries	6.0%
Include Scottish and Welsh waters	2.2%
More Highly Protected Marine Areas (HMPAs)	2.2%
Manage quotas	2.2%
Measures in place don't need to change	2.2%
Changes in fishing equipment	1.5%

Theme of answer	Percentage of responses
Licensing of vessels	1.5%
No trawl areas	1.5%
Introduce fines	1.5%
Establish monitoring programme	1.5%
Compensatory work	0.7%
Count populations via trapping	0.7%

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