

Dear Petition Committee Members,

Re: Comments for Petition Committee Meeting June 2018

Thank you, once again, for the opportunity to submit comments for the next Petition Committee Meeting.

1. Comments relating to the Cabinet Secretary's letter

It is pleasing to note that the **Cabinet Secretary** for Energy, planning and rural affairs letter (April 2018), indicates that the "*health and status of razor clam stocks and environmental effects*" remains a continuing theme for any stock assessment and future harvesting methods.

2. Comments relating to the razor Clam Report

2.1 The report is an extensive literature review; and documents potential methods for stock assessment. From reading the report it would appear that much of the literature review is grounded in general knowledge about razor clams, in other locations, with a few specific references to Llanfairfechan beach. However, the report shows that it is not known with any degree of accuracy the extent and viability of the fishery at Llanfairfechan and therefore the sustainability of current practices on this resource for future generations. What is interesting is that it has been an area of study in many areas of the UK and Europe and some fisheries appear to have established, policed and managed effective and sustainable fisheries.

2.2 The report echoes many issues raised at the public meeting held last July. i.e. razor clams have a restricted distribution, therefore populations can be vulnerable to over exploitation. There is a suggestion in one section of the report that there may be evidence of previous overfishing:

*" With no evidence of a vast subtidal bed, and no indication of recruitment in the fished areas, it was suggested that the groups may be targeting an important brood stock, and it was thought from anecdotal evidence that the razor clam catch per person was decreasing in the intensely targeted areas"*p12. This comment may be indicative of a reduction in the size of the RC beds.

2.3 In addition, there is a need for detailed understanding of the local environmental, biological landscape, intertidal areas to inform authorities what effective management and assessment of the resource needs to be undertaken, if it is to be properly utilised.

Some potential questions for research are:

- Clear detail to determine if the E Siliqua is the most abundant intertidal clam locally;
- What the density of E Siliqua per M² locally?
- When is the prime spawning season for E Siliqua locally?
- When is the optimum time to apply a closed season for harvesting?(*see comments below also);
- What is the growing rate of the clams locally?

*The report outlines some very helpful information relating to the life cycle, spawning and maturity of razor clams which will hopefully enable the Petition Committee to help within the fulfilment of one of the themes of the petition i.e. to recommend a suitable 'closed' season for the harvesting of razor clams and this should be aligned to the spawning season. In addition, the information regarding Minimum Landing size is useful, although there are no suggestions regarding optimum quotas which may be taken, or what constitutes overfishing.

2.4 A point raised in the report's recommendations states the potential for research bias. Perhaps this could be counteracted by the timely co-opting of interested locals, during the research process e.g. fishermen, commercial fishermen and environmentalists. This would help to make the process more open, transparent and lead to a genuinely local- led initiative.

2.5 It has been muted at previous Petition Committee meetings that the Marine Biology Department of Bangor University is best placed to be involved in any ongoing investigations, and as has been outlined before, this is an ideal opportunity to conduct some highly useful, original and unique local research.

3 Comments relating to continued harvesting and signage

With regard to the current signs, which indicate the razor beds are closed; it was noted last week that there were a few spring tides and a handful of gatherers were seen on the beach on three occasions. Janet Finch-Saunders (AM) is aware of this infringement of the Bye-Law. Once again, it must be reported that the current signs appear to be inadequate, both in terms of their lack of prominence and they do not appear on or near all access points to the beach.

I wish to thank the Petition Committee for their steadfast interest and actions when working on this petition.

Yours faithfully,

Vanessa L Dye in collaboration with John Jones(Llanfairfechan resident and local angler)