

From: Chief IFCO/Scientific and Conservation IFCO

To: Kent and Essex Inshore Fisheries and Conservation Authority –  
18 June 2025

Subject: Manila clam trial overview

Classification: **Unrestricted**

### **Summary:**

KEIFCA ran a public consultation on the shape and nature of future Manila clam fishery trials. Building on feedback from the consultation, officers have developed an outline for the 2-year trial, an application form with marking criteria, and a draft Code of Conduct for trialists. An outline of the 2025 trial has been included although a final update for the 2025 trial will be submitted at the next Authority meeting

### **Recommendations:**

1. The Authority is asked to **APPROVE** the proposed Manila clam fishery vision.
2. The Authority is asked to **APPROVE** the 2-year trial outline including the principle of one application per business and 8 trial places, and the application process as described (including the Application form and the Allocation Process for KEIFCA for 2025-2026 Manila Clam Trial and the draft Code of Conduct).

### **Introduction**

The Manila clam (*Ruditapes philippinarum*) is a high-value shellfish that has become ever more abundant in the Thames Estuary over the last few years. In order to assess the potential for the establishment of a viable future fishery, KEIFCA ran a trial to understand the impact and economic potential of different types of harvesting gear and operations. This trial took place over a month in October of 2024 and was a success, with significant amounts of data being collected. The results of the trial were discussed at the January 2025 Authority meeting and the Authority agreed to a 2025 trial fishery focussing on understanding how the fishery works and its impacts at a fleet level. This paper provides:

- 1) Feedback from the Clam trial consultation
- 2) An overview of the 2-year clam trial proposal including the application process for trialists
- 3) An initial outline of the 2025 trial management measures

## **1) Clam trial consultation – feedback**

### *Introduction*

KEIFCA wants to work closely with the whole community on this project, and at the last meeting the Authority agreed to undertake a consultation with all stakeholders that expressed an interest in the 2024 Manila clam fishery trial. The consultation opened on the 3rd of April and closed on the 28th of April and sought feedback on:

- A proposed vision statement for the fishery
- Outline of the proposed trial
- Outline of the proposed application process

In total, KEIFCA received ten responses, seven of which were from businesses/individuals that participated in the 2024 Manila clam trial (Appendix 1 summarises the consultation responses).

### *Proposed Fishery Vision*

Whilst most of the responses commented constructively on the vision statements, support was split between all 3 potential vision statements as well as one respondent suggesting their own option. As there was no overwhelming preference for a particular vision, KEIFCA recommends the adoption of the following alternative vision, which captures identified strong points, highlighted by the industry, of each of the four statements.

*"Seek to create a small-scale, sustainable Manila clam fishery that has a reputation for producing a high-quality product for a thriving local market, supported by investment in local processing infrastructure, while safeguarding the environment through industry-driven stewardship of clam beds."*

### *Feedback on the outline of the trial and number of trialists*

In general, there was support for the main components of the trial outline. The main concerns were around the area open to the trial and the concern that they needed to be bigger to sustain more fishing effort. Two respondents suggested that allowances be made for vessels to look for new grounds to add to future trials.

The feedback from the consultation was used to inform and build the suggested trial structure included in sections 2 and 3 of this paper. Building on specific suggestions from the industry, KEIFCA have modified the structure of the trip and catch limits (section 3) to be fortnightly instead of weekly, in order to increase flexibility and address difficulties associated with weather.

Using feedback, two prospecting trips have been added to the trial, in which vessels will be able to explore new clam grounds within the Thames Estuary as long as the grounds have the appropriate shellfish classification (section 3). Catch from prospecting trips would be permitted for landing, and GPS tracking and data forms would be required. Prospecting will not be permitted in any areas within which bottom towed fishing gear is prohibited.

#### *Feedback on the number of trialists*

Five respondents, all of whom were part of the 2024 trial, suggested that the number of trialists should remain at 8 vessels. One respondent stated that if increases in trialists were deemed necessary it should be a minimal increase. Conversely, one respondent who was a 2024 trialist was in favour of increasing the number of trialists to ten. All three respondents that were not 2024 trialists wished to increase the number of trialists to 10. Appendix 1 provides more detail of stakeholders' rationale for each option.

The input from respondents clearly outlines the arguments for and against and increase, unfortunately feedback from the clam stock assessment surveys was not positive and the analysis suggested drops in stock numbers in the areas previously fished, as outlined in section 2 the recommendation would be to keep the number of trialists at 8.

#### *Comments on the application process*

There was varied feedback from respondents on the application process, with many different suggestions presented. One respondent expressed the need for the scoring panel to be composed of individuals external to KEIFCA to avoid bias derived from existing relationships with fishermen. Another suggested that assistance be provided by KEIFCA for applicants, allowing for oral discussions to be included in the application. There was criticism of the application process timeline, as sufficient time has not been allowed for gear design and development by successful applicants. One respondent was supportive of only accepting one application per business, whereas another stated that only personal applications should be accepted rather than those associated with a business.

Building on consultation feedback it is suggested that the application scoring panel should be composed of individuals external to KEIFCA as well as Authority members to addresses any concerns regarding the impartiality of the scoring process. The recommendation now has increased the number of external members

on the Applications panel so there are two Authority members and two externals (section 2).

After considering the stakeholder feedback and the small number of trial spaces available (8) the recommendation remains that there should be one application per business (Section 2).

#### *Comments on the application form or scoring of the applications*

Three respondents identified that the 'experience' section is the most important and should be scored higher whereas the 'clam fishery development plan' should be scored lower. Three respondents were critical of photographs being awarded higher marks, explaining that the expectation of applicants to build gear would be unreasonable if their place on the trial was not confirmed. It was suggested that detailed drawing of gear should be awarded the same marks as a photograph. Both these suggestions were included in the recommended application form and assessment process.

#### *Summary*

The consultation responses were invaluable to KEIFCA officers to help shape both the direction of the clam trial and this papers recommendations, and we would like to thank fishers for spending their time producing detailed and well thought through responses. Whilst different people wanted different outcomes, officers have endeavoured to consider and balance these views when developing recommendations. Whilst officers have highlighted the main points or suggestions that have been taken from the consultation feedback, the consultation (Appendix 1) has informed all the proposals outlined in the rest of the paper.

## 2) Overview of the 2-year clam trial

As with last year, KEIFCA are still using the trial to gather information on the 11 key points (below), however, the key focus of this 2-year trial is to start to assess fleet-level effects on the biology, stocks, and economic considerations and enforcement of our management. It is particularly important to understand how the clam stocks will hold up to commercial levels of fishing, both within a fishing season and then the following season.

### **Biological**

- Being able to reliably age the clams and so understand growth rates, size of maturity and age of maturity.
- Understand the annual cycle of growth rates and maturity.
- Develop a reliable stock assessment process.
- Develop a better understanding of the distribution of clams and clam beds outside normal survey areas.

### **Fishing**

- How will the clam stock react to different levels of fishing?
- Can current Manila clam stocks sustain fishing over a 2-month fishing season?
- What will the Manila clam stocks look like after a year or two of sustained fishing?

### **Economic**

- How large is the market for Manila clams, and how can we help ensure that good prices are sustained across the fishing season?
- How can we get the most local benefit, in the form of jobs, investment and infrastructure from this fishery?

### **Enforcement**

- What is involved in the landing inspection process?
- What controls are in place to ensure spatial management measures have a high level of compliance?

Using vessel tracking technology, the trial aims to assess the impact of different intensities of clam fishing on both the clam stocks, the cockle stocks and on the seabed. Running the trial over two years allows our KEIFCA science team to monitor these impacts over successive seasons. This will provide insight into what will happen if these trials move towards becoming a commercial fishery in future. Running the trial over a longer period will help answer biological, fishing, economic and enforcement questions, as well as provide an opportunity for trialists to invest in and commit to the trial with more confidence.

A 2-year trial also helps KEIFCA develop clam-specific management measures such as allocating TAC and trips over a 2-week window rather than per week (responding to the greater impact of weather on this autumn/winter fishery) and test inspection procedures for officers on land and at sea. As with last year we hope to work very closely with the clam trialists to collect the data we need to pass all the necessary MPA assessments.

### *The application process*

Unfortunately, we are working in quite a compressed time window to run and then assess clam trial applications. To give all trialists as much time as possible to consider and complete their application, all the stakeholders who had previously registered interest in the clam fishery were emailed on the 10<sup>th</sup> of June, informing them of this paper, the draft application form and scoring criteria. Any changes that the Authority agrees in this meeting will be emailed to all stakeholders;

however, this would give applicants just under 28 days to reply with the deadline set at 3pm on the 7<sup>th</sup> of July (any applications after this deadline will be ineligible).

### *The application form*

The applicants will be required to fill in an application form that is split into four sections with changes made based on feedback from the industry, as follows: Marks have been increased for sections on experience (fishing and landing in the Thames, fishing and landing shellfish as well as experience of working constructively in scientific trials or surveys) and decreased for the section on their clam fishery development plan (Appendix 2 for draft application form and Appendix 4 for the process of allocating trial places and the scoring criteria):

- 1) Outline of proposed clam fishing operation, that would be split into sections on the boat, the fishing gear, the sorting gear and landings/sales, *Higher marks would be given for photos of gear or clear, annotated drawings.*  
- 30 MARKS
- 2) Outline of experience of fishing and landing in the Thames, fishing and landing shellfish, *Higher marks would be given to applicants that can show they have expert knowledge and significant, long-term, regular, and current experience*  
- 25 MARKS
- 3) Outline of experience of working constructively in scientific trials or surveys, *Higher marks would be given to applicants that can show they have expert knowledge and significant, long-term, regular, and current experience*  
- 20 MARKS
- 4) KEIFCA manila clam fishery development plan, *Higher marks would be given to applicants that demonstrate exceptional experience, competence, and capability in delivering the key details and requirements of the plan whilst delivering value additional to the requirement in supporting local business and supply chains, adding value to the catch especially within KEIFCA district and supporting the wider community.*  
- 25 MARKS

Development plan to include:

- ☐ An overview of your commitment to the trial and plan to help collect evidence and develop a potential clam fishery over the next 2 years.
- ☐ Details of intended markets for products and steps you propose to take to ensure your company maintains a high-quality product.
- ☐ Details of how you or your processor intend to add any value to the catch and any plans to create new local markets
- ☐ Details of how you will be supporting skilled local employment, local businesses and local investment.
- ☐ Details of steps taken to reduce the impact of fishing operations on the clam stocks, the cockle stocks and the seabed.

### *Agreeing a panel to assess the applications*

For the 2024 trial, a panel of three KEIFCA members reviewed and scored the applications. Feedback from one of the participants from the consultation suggested that the whole application panel should consist of individuals from outside the district to avoid any bias. As a compromise it is suggested that the panel should consist of four members, two KEIFCA members, the CEO of the Association of IFCAs and Prof. John Humphries (the ex-chair of Southern IFCA and an expert on Manila clams who is currently in the final stages of completing a book on the species).

The applications will be scored and ranked, and places on the trial offered to applicants in descending order until all the places have been allocated. A standby list of the next four applications will be kept on record and a trial offer will be issued if a participating trialist withdraws, again in descending ranked order. To spread the opportunity as widely as possible KEIFCA will only accept one application per business (i.e. applicants with related companies/interests would only be able to apply on behalf of one company/interest). Applicants would be informed if they have been accepted onto the trial or be on a standby list by the 14<sup>th</sup> of July.

### **3) The 2025 trial proposals**

The trial for the first year will run over 6 weeks starting in November 2025 and ending in mid-December 2025, with 2026 to be decided at a later date. As in the 2024 trial, the trialists will be able to sell their catch. Any successful applicant will be required to contribute to the trial, attend in-person meetings in the district (up to 4 a year period), supply all relevant trial data and sign-up to a Code of Conduct (Appendix 3). All trialists will be required to use a specified vessel tracking system whilst taking part in the trial and will be withdrawn from the trial if found to be breaking any of the management conditions as outlined in the Code of Conduct (see the draft attached – Appendix 3).

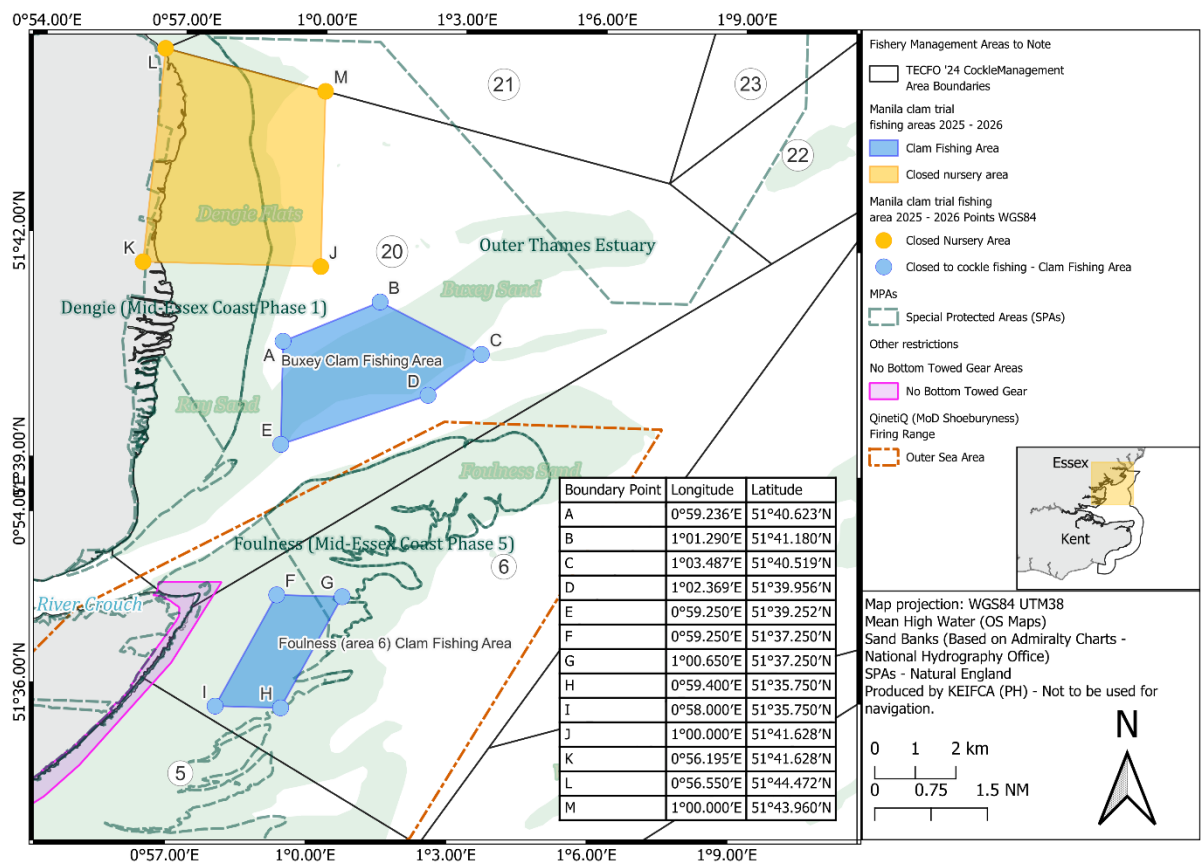
#### *Number of trialists*

Spring stock assessment surveys suggest that clam numbers have declined significantly since 2024. Due to this, officers are recommending that eight trialists will be selected for participation instead of increasing to ten.

#### *Trial Areas*

The proposed trial areas are highlighted in blue in Fig. 1. In addition, it is proposed that two additional trips will be allocated for prospecting, in which vessels will be able to explore new clam grounds within the Thames Estuary as long as the grounds has a valid and appropriate shellfish. Catch from prospecting trips will be permitted for landing, and GPS tracking and data forms would be required. Prospecting will not be permitted in any areas within which bottom towed fishing gear is prohibited. Further, an area of the seabed will be closed to any dredging, as a reserve for the stock and to ensure that the fishery does not hinder the conservation objectives of any MPAs within the area (Fig. 1). KEIFCA need to

work with other agencies to finalise this proposal, and more details will be provided at the next meeting.



**Fig.1 Plotted coordinates of proposed Manila clam trial areas**

*Catch and trip limits*

Final catch and trip limits will be determined from September surveys, to ensure that the latest data on the abundance of clams is used, however officers have included potential detail to give trial applicants an outline of the trial. Officers propose that management measures will be structured as fortnightly limits, rather than weekly limits in order to increase flexibility and address fishing difficulties associated with weather. At present, using the data we have currently got, we are projecting setting each trip at 300kg (we would like to develop a volume equivalent in standardised fish boxes).

	Start	Finish	No. Trips	Landings permitted per trip
<b>Week 1</b>	4 Nov @ 08:00	8 Nov @ 18:00	2	300 kg
<b>Week 2</b>	10 Nov @ 08:00		4	300 kg
<b>Week 3</b>		21 Nov @ 12:00		
<b>Week 4</b>	24 Nov @ 8:00		4	300 kg
<b>Week 5</b>		5 Dec @ 12:00		
Prospecting trips				
<b>Week 6</b>	8 Dec @ 8:00	12 Dec @ 12:00	2	300 kg



### *Reviewing the trial after Year 1 (2025 trial)*

As with the 2024 trial, officers will look to compile a report of the findings of the 2025 trial for the January or May 2026 quarterly meeting. After considering the findings and recommendations of the report, members will be asked whether they want to continue with the trial or not. Summary feedback will also be given on the engagement of trialists, and recommendations could be put forward regarding individuals' future involvement based on the Code of Conduct criteria.

***After discussing the trial with our legal team, we need to make it very clear to all prospective applicants that taking part in the trial does not create or confer any legitimate expectation of future access to any possible clam fishery or to any future trials.***

***If these trials are successful and more trials are undertaken in the future it would be the intention of the Authority to run a new application process using criteria deemed relevant by the Authority, that would be open to all those that expressed an interest.***

### **Recommendations**

1. The Authority is asked to **APPROVE** the proposed Manila clam fishery vision.
2. The Authority is asked to **APPROVE** the 2-year trial outline including the principle of one application per business and 8 trial places, and the application process as described (including the Application form and the Allocation Process for KEIFCA for 2025-2026 Manila Clam Trial and the draft Code of Conduct).