

Response Summary

Manila Clam Trial Consultation – The Next Steps

KEIFCA have run a consultation to provide feedback on the shape and nature of future clam trials in the Thames Estuary. The consultation opened on the 3rd of April and closed on the 28th of April 2025. In total KEIFCA received ten responses, seven of which were from businesses/individuals that participated in the 2024 Manila clam trial. This document summarises the responses that KEIFCA received.

Question 1: Which vision statement do you think KEIFCA should use, and why?

Vision 1: Seek to create a thriving, sustainable Manila clam fishery that has a reputation for producing high-quality, environmentally responsible, local product through the use of low impact clam harvesting equipment and industry-led stewardship of clam beds.

Vision 2: A small-scale, sustainable Manila clam fishery that supports the local coastal community through the creation of a high-value local clam market, investment in local processing infrastructure, and the provision of skilled employment.

Vision 3: Strive to balance economic, social, and environmental needs; maintaining a long-term, lucrative Manila clam fishery that enhances the local economy, while safeguarding the wider ecosystem it relies on, resulting in a fishery with a reputation for high quality product.

There was a fairly even split in preference between the vision statements, with three for Vision 1, four for Vision 2, and two for Vision 3. The following were mentioned as key phrases in each statement by respondents:

- Vision 1: Industry-led; high-quality, local product; sustainable.
- Vision 2: Small-scale; local; investment.
- Vision 3: N/A

Respondent	Response	2024 Trialist?
A	Vision 1, as it captures what we believe a successful Manila clam fishery should look like – sustainable, well-managed, and aiming to produce a high-quality, local product. What really stands out in this vision is the emphasis on industry-led stewardship. We’re strong believers that those working on the water every day are best placed to help look after the resource, provided there’s clear communication, data sharing, and a shared responsibility for sustainability.	No
B	Vision-1 as it captures what we believe a successful manila clam fishery should look like sustainable well managed and aiming to produce a high-quality local product.	No
C	Vision 1 through all reasons explained. Suction Dredging should not be discounted as a fishing method as	No

	adjustments to the Suction Dredge, Water Pressure, Suction force can reduce breakages. All dredge Types should look long-term to have the dredge skies in line with the dredge blade to reduce unnecessary seabed impact reducing potential blue carbon disruption. Clams should be handled with maximum care when handled on board whether for sale or returning undersize clams back to the seabed.	
D	Number 3 This sounds the best and reads how we want the fishery to go.	Yes
E	Vision 3. We need to do everything sensibly to ensure this fishery will work. As we have very little else to turn to. We are keen to work in collaboration with KEIFCA to gain the support of a successful fishery now and in the future.	Yes
F	Vision 2 best encompasses what we have in the estuary. I think a small local fishery that lasts is the most desirable outcome.	Yes
G	I believe that the Vision 2 statement best reflects the aims and desires of the local fishing Industry and that this would reflect well on the Authority in general.	Yes
H	Please consider the below as a combination of the above as an alternative.	Yes
I	Vision 2. Would keep it a small-scale fishery for those that are willing to build it up over time at properly not a lot of profit to start to something that will grow, with local processing plants to enhance profit and product to be able to sell to local buyers. Building a reputation for local caught clams.	Yes
J	Vision 2. Keeping the fishery small scale will be better for the environment, the fishermen and investment locally in processing increasing crew employment locally.	Yes

Question 2: If you would like KEIFCA to consider an alternative vision statement, please include your version below and highlight the components that you think would make this a strong vision statement.

There was one alternative vision suggested by a respondent, presenting an option that was a combination of all three vision statements (see Respondent H in the table below).

Respondent	Response	2024 Trialist?
A	N/A	No
B	N/A	No
C	N/A	No
D	2 would have been the second statement I chose	Yes
E	N/A	Yes
F	N/A	Yes
G	N/A	Yes

H	Seek to create a thriving, long term, sustainable manila clam fishery that has a reputation for responsibly caught high end product with co management and development from industry and authority whilst enhancing the Thames fleet and its fishers.	Yes
I	N/A	Yes
J	Include caution on amounts to be taken no more than 300 kg per trip to safe guard the stock and lower impact on all species. Keeping supply at a sensible rate to fulfil demand keeping prices high.	Yes

Vision Recommendation

As there was no overwhelming preference for a particular vision, KEIFCA recommends the adoption of the following alternative vision, which captures identified strong points 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."

Question 3: Do you have a view on the outline of the trial, or the number of trialists?

The second section requested feedback on a proposed outline of a future trial. Respondents were asked to comment on the following:

- 2-year trial period over 2025 and 2026
- Trial duration of 6 to 8 weeks in autumn
- Code of conduct to be signed by trialists
- Primarily take place in the 2024 trial areas
- Number of trialists/boats to remain at 8 or increase to 10

There were no responses in opposition of a two-year trial, and one response in favour. The response in favour cited encouragement of investment as a drawcard of the proposal. There were no responses in opposition of a trial duration of six to eight weeks in autumn. Two respondents were in favour of the duration, due to increased consumer confidence with a longer trial, and the healthy condition of clams in autumn. There was one respondent in favour of a code of conduct, with none in opposition. Some respondents were critical of the areas used in the 2024 trials. They identified that the areas were too small and that catch rates dropped towards the end of the trial, and that this would be exacerbated with an increase in trialists or catch volumes. Two respondents suggested that allowances be made for vessels to look for new grounds to add to future trials.

Feedback on the number of trialists depended on whether the respondent was a 2024 trialist or not:

2024 Trialists: Five respondents, all of whom were part of the 2024 trial, expressed 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. Most of those in favour of keeping the trial at eight vessels were concerned by an increase in

trialists, given the experience of catch rates dropping towards the end of the 2024 trial. Further, most cited concerns regarding market flooding and a decrease in the price of Manila clams if more trialists were added, which several identified as a risk to the financial viability of and investment in the fishery. Several responses suggested that increases in the number of trialists should only occur once more information on the stock and the market had been collected. Conversely, one respondent who was a 2024 trialist was in favour of increasing the number of trialists to ten.

Non-trialists: All three respondents that were not 2024 trialists wish to increase the number of trialists to 10, to broaden the dataset, support as many local fishermen as possible, and increase the economic viability of the fishery.

Respondent	Response	2024 Trialist?
A	Expanding the trial to include 10 trialists/boats will provide a broader data set. Also an increase in daily volumes landed will increase the economic viability of the fishery.	No
B	Expanding to 10 boats for viability of the fishery.	No
C	The long-term aim is to have a sustainable Clam fishery that supports as many fishers as possible. So, the trial should start with a commercially viable and sustainable fishing fleet size of 10.	No
D	We think for this next trial it should be limited to 8 boats as you have indicated it will only be a small area again. At the end of the last trial the catch rates dropped considerably and there was only 6 active boats. There would be problems selling the clams at a high price if there was many boats doing this and would deter investment into a purifying plant which will be needed to obtain a good price and to start getting the good name of the Thames clam out there to local markets and restaurants.	Yes
E	It would be sensible to keep the number of trialists the same as last year to enable the survey to be consistent. If this grows in number before it has even started the market could become flooded. The 2 small areas would not survive if we invite more vessels. I suggest we look for alternative areas to try in the trials.	Yes
F	A longer trial is a great idea, I think that flexibility is key, let's not get hemmed in by self imposed restrictions. The number of trialists should stay the same until all fishing and marketing assessments are completed with confidence. Once there is an operational fishery, then lets see how the fishery changes with additional trialists.	Yes
G	My personal view for the upcoming trial is that the difficult decision on how many trialists should be considered is very dependent on the following factors.1. consideration to the impact of the grounds that is evidenced from the last trial. 2. The area to be fished will this be increased or the same as the initial trial. 3. Depending on the answers to the above 2 points it may	Yes

	<p>be sensible to only consider increasing the trialists by a minimum amount as there is very little known at this point on the stock density and reproduction growth rates.</p> <p>4. If there was major increase in trialists there is the risk of over flooding the local marketability which would decrease the maximising of the value of the fishery in the long term. I do believe strongly that will very careful consideration that the trial will give consumer confidence in the local market for the 6-8 week period being suggested, and in particular to the Autumn period as suggested, as the clams will no longer be spawning and in a stronger healthier condition than during the summer months. The proposal for a 2 year period of the trial is definitely the way forward to allow further investment in equipment and knowledge to develop a very sustainable and economic fishery and supporting the local market place and local employment.</p>	
H	<p>Remain at 8 trialists until such a time financial sustainability can be achieved from the fleet. Add more vessels as more areas are identified, opened, when stock assessment and scientific data allows. Financial stability would require considerable more quota than has previously been issued, recommend that the 6-8 week period should be aiming to be at 2000kg per 2 week basis. Allowing fortnightly or more flexible quotas would help with increased weather restrictions as the fishery moves on into the late autumn. Prioritise allowing time and movement for vessels to be able to identify new grounds for future inclusion in the fishery. Those that are not seen to be contributing, developing and working with other trialists and the authority truthly without just cause, should be removed from the trial immediately and replaced with the next in the list.</p>	Yes
I	<p>I think trial should be run with max of 10 boats.</p>	Yes
J	<p>The first new year vessels with working batch dredges only this in itself will be an increase of 25 percent impact from 2024 on clams being harvested. Take opportunity of using successful clam fishers/dredge builders and their skills. This will help the officers develop the fishery. As the impact did show last year on some areas but there were unsuitable dredges being used that may have had an impact on this.</p>	Yes

Trial Outline Recommendation

KEIFCA recommends the following trial structure. A 2-year trial period, from 2025 to 2026, during each year a trial would be run over six to eight weeks in autumn. 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), supply all relevant trial data and sign-up to a code of conduct. All trialists will be required to use a 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 (exact details would be included in the code of conduct).

Several respondents raised concerns regarding the areas remaining similar to the 2024 trial. Therefore, KEIFCA recommends that trial areas be re-evaluated with survey data and expanded if it is deemed appropriate for the stock and overlapping Marine Protected Areas.

Further, following suggestions from respondents, KEIFCA recommends adding two prospecting trips within 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. 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

KEIFCA recommends that catch limits and the number of trips per week be calculated after surveys have taken place, with the final proposals submitted to the September Authority meeting. KEIFCA also recommends that the structure of the trip and catch limits should be fortnightly instead of weekly, in order to increase flexibility and address difficulty associated with weather.

From this consultation, there was not a clear outcome as to whether 8 or 10 vessels will be more appropriate. Therefore, KEIFCA recommends that this number be determined by the results of stock surveys.

Question 4: Do you have any comments on the application process?

Respondents were supplied with an outline of the application process for future Manila clam trials and asked for feedback. Some responses to Question 4 were regarding the scoring of the application. These are more aligned with Question 5 and so will be further discussed in that section of the summary. Similarly, some responses to Question 5 are more aligned with Question 4, and thus will be discussed here.

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.

There were no responses in opposition of the rest of the proposed application process.

Respondent	Response	2024 Trialist?
A	It would be better if the assessment panel were made up entirely of individuals external to KEIFCA, perhaps including members from another IFCA. This would help ensure the process is as impartial as possible and reduce any perception of favouritism, especially given the limited number of places and high interest in the trial. Also, while the application requests photos of gear, it should be	No

	made clear that drawings or detailed diagrams are equally acceptable. It's not reasonable to expect applicants to invest in specialist equipment before knowing if they've secured a place on the trial. Allowing for visual plans and clear descriptions at this stage would still provide the necessary insight into applicants' preparedness without creating an unfair barrier.	
B	While the application requests photos of gear it should be made clear that drawings or detailed diagrams are equally acceptable it not reasonable to expect applicants to invest in specialist equipment before knowing if they've secured a place on the trial allowing for visual plans and clear descriptions at this stage	No
C	Freedom of Market should be maintained to assist in a higher value when selling clams.	No
D	No I think the application process will be fair	Yes
E	Since taking part in the 2024 trials – I have spent many hours making a wet dredge at a substantial cost. I would hope last year's trialists will have first refusal if they meet the criteria set out for 2025.	Yes
F	June is very late to be ready for an autumn fishery. I would like to invest a lot of time into the clam trial. If involved in the trial i would want maximum time to create the best set up, particularly a sorting mechanism that isn't boded together.	Yes
G	The application process itself seems relatively clear, However I think to make it very clear details of the specifications of the fishing and sorting gear need to be included, as the scoring system for higher points with photo evidence would clearly be an issue for an applicant if they did not have clear guidance on the specification and could result in unnecessary financial cost in the building or design of gear.	Yes
H	Ensure neutral help is available to those who ask. Should the applicant wish to, allow for oral discussions with a set officer without bias to be included once interpreted to their initial application.	Yes
I	Preference to those who took part in previous trials due to the expense that was put in to making dredges etc and skill required to this type of fishery.	Yes
J	Details of the dredge type and pump design most important to impact the clams and biomass. Personal applications only.	Yes

Application Process Recommendations

KEIFCA recommends that the application scoring panel should be composed of KEIFCA Authority members, along with individuals external to KEIFCA, such as staff from another IFCA or the Association of IFCAs. This addresses concerns regarding the impartiality of the scoring process.

It has been highlighted that the timeline for the application process does not provide trialists with much time to develop harvesting and sorting gear. Unfortunately, the application process cannot be moved forward due to existing workload. The two-year

trial period was originally suggested as a strategy to allow for investment of both time and money in the trial, and so even though this year there is a short period in which trialists can prepare, next year this issue should be significantly reduced.

Question 5: Do you have any comments on the application form or scoring of the applications?

This section requested feedback on the proposed criteria and scoring of applications. An outline of the broad sections that the application form would address was provided, along with details around the scoring criteria for each section.

Three respondents identified that Section 2, “experience of fishing and landing in the Thames, fishing and landing shellfish [...] working constructively in scientific trials” is the most important and should be scored as such. Some commented that Section 3, “clam fishery development plan” should be scored lower, as it doesn’t require any evidence and thus may lead to unsuitable applicants performing well against the criteria. Section 3 received criticism from one respondent, expressing that due to the relative youth of the Thames clam fishery, marketing and investment would be subject to change as the fishery develops and that encouraging planning may hinder natural development and cause uncertainty.

Three respondents were critical of photographs being awarded higher marks, explaining that the expectation of applicants to build gear (which comes with great investment of time and money) 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.

One respondent (who was not a 2024 trialist) highlighted the importance that the application scoring does not favour 2024 trialists. Conversely, two respondents (both of which were 2024 trialists) stated that priority should be given to trialists from 2024, due to the significant financial investment made by those businesses and the benefit to future trials of skills gained during the previous trial. One response suggested that those who filled out an application for the 2024 trial, regardless of whether they were successful should get priority. Another stated that local vessels should be prioritised.

Respondent	Response	2024 Trialist?
A	Experience should rank above all others. Its critical to demonstrate commitment to fishing within the Thames, as well as ability to do so.	No
B	Having experience in dredging goes a long way.	No
C	As legal advice states there is no legitimate expectation of future access to the future clam fisheries via trials. Any points given in scoring future applications once trials have been completed should not favour a trialist in any way.	No
D	No a scoring application is the fairest way.	Yes
E	I would hope this will work.	Yes
F	Section 3 gives top marks of 40 but the answer to all the questions in section three are hypothetical and based on our hopes and dreams. Sections 1 and 2 are evidential but then somebody like A.A Milne or Roald Dahl could ace section 3 and have us fishing with Winnie the Pooh and the BFG.	Yes

G	I agree it is correct to only accept 1 application for a place in the trial and that related business should be excluded from the application process, this keeps it very open and transparent process and gives a wider opportunity for the benefit of the local communities.	Yes
H	Need simplifying to an arrangement that means there is no interpretation of answers, specific scoring. Section 2 should be scored higher and should maintain to be the highest scoring section of the application. Section 3 needs more consideration as to if it is too early in the process of the fishery to be asking these questions, for example; the markets are new, developing and are likely to change even within season. Asking for added value should almost be secondary at this stage of the process, the fishery itself should be priority. The fishery financially is currently far too small to be talking about local investments. Being more open as in the initial trail (as was seen dramatically) will show greater development on gears rather than asking for committed ideas. Most of the criteria in section 3 will naturally develop as the fishery grows and becomes more investable, putting early pressure on it will likely cause failure and leave people questioning investment. The more open and less restrictive the trials are will show considerably quicker growth. Those that initially applied to be part of the first trial (15) should take priority over people whom have vested an interest with an email, those that had applied were committed to invest with their time and financially rather than just a quick email in case things change in the future. The application should be developed between the authority and trialists so that achievable questions and requirements can be asked of other fishers.	Yes
I	No	Yes
J	The application to local vessels supporting local industries.	Yes

Application Scoring Recommendation

KEIFCA recommend that the marks allocated for Section 2 be increased. This will ensure that skilled, experienced applicants can score highly. Despite concerns raised, KEIFCA recommends that Section 3 should remain, to ensure that trialists are striving towards a fishing operation that aligns with the fishery vision. However, KEIFCA recommends that the marks allocated for this section be decreased. Further, KEIFCA recommends that it be made clear that a detailed, annotated drawing can be scored just as highly as a photograph in Section 1. This addresses criticism of the unreasonable investment designing and building gear requires.

KEIFCA has made it clear that no priority will be given to any group, and that the application process aims to be fair, transparent and equally accessible. Its objective is to ensure that participants in future trials are skilled, experienced fishermen and willing to invest time and money into the development of a Manila clam fishery in the Thames in line with the fishery vision.