

**Thanet Fishermen's Association.
312 Ramsgate Road,
Margate,
Kent.
CT9 4DU.**

21.09.17.

Re: Thanet Fishermen's Association response to: License application update and further information relating to an application for a marine licence to dredge aggregate at Goodwin Sands under Part 4 of the Marine and Coastal Access Act 2009 ("the 2009 Act").

License application number: MLA/2016/00227:

Dear Mr Morris,

Please accept this letter as the third round objection to the Goodwin Sands dredging application, based upon the additional information supplied by the applicant.

Thanet Fishermen's Association has objected to this license being granted on two previous occasions, and the points on which those objections were made are still maintained and have in no way been mitigated or reduced by the additional information provided by the applicant, the reductions in quantities of material, the alteration of the dredge area or the timing of the proposed dredge programme. The Fishermen's objection has always been based upon the loss of ground and the lack of accurate information within the application.

Reduction in dredge footprint/ amount of material.

The summary of impacts at table 4-1 and the potential impacts noted are still severely understated and show the lack of engagement with the Fishermen's Association. There is a suggestion that Fishing will only be affected when the dredgers are working, or during the dredge programme, but there is no mention of how the ground will be affected and unfishable, once the area has been dredged. The lower number of dredge periods are stated as reducing the overall level of disturbance to the Fishermen but all of the conclusions drawn in this section of the report are based upon speculation and a lack of data, as stated in the report itself. It has taken a concerted archaeological campaign to alter the footprint of the dredge area and yet is assumed, on page 27, that this is a benefit to the Fishermen when no consideration has been given to how the Fishermen use the ground or how their methods of Fishing will be affected. On page 26, the report wrongly states that 'there is no information to suggest that the

originally proposed dredge area is of particular importance (in comparison to the wider study area) to any single fishing type or target species' despite DHB and Mac Allister Elliot being told that part of the dredge area is used for bottom drift netting, targeting Dover Sole, Skate and Bass. The use of this gear is very specific and very sensitive to change. This was proven in one area of the dredge footprint when a Ramsgate Fishing vessels gear collided with unadvertised survey equipment left on the seabed.

Mitigation table 4-1.

The introduction of a Fisheries Liaison Plan and an FLO is welcomed as recognised mitigation but relies upon a basic understanding of the Fishing impact being in place and without that it has little meaning outside of a way to distribute information. Both the FLO and FLP should be recognised as a license application standard rather than a form of mitigation. While the applicant has been quick to list the environmental benefits of them being allowed to dredge the Goodwins (Lower Carbon Footprint/ Less congestion than road haulage), it has not attempted to look at the environmental damage this will cause to the Fishermen. Had they been genuinely concerned about impact to the Fishing Industry, the FLO mentioned as mitigation, should have been local to the project and from the start should have been involved in developing a full understanding of how the ground is fished and what the impacts would be on local vessels. An FLO will only be engaged once the license is granted, at which point the Fishermen are effectively on the back foot and the FLO role becomes very different. In addition, the surveys suggested by the Fishermen should have been taken on board and would have provided more information than the report has managed to achieve. As previously stated, the residual impact being noted as 'Minor adverse/ Negligible' is an indication of the lack of understanding of how Fishermen use these or any other areas of ground.

Additional information on new projects.

As well as the additional information received from the applicant, the Fishermen's Association feels it must be recognised that since the original Goodwin Sands dredge application was made, new projects have come to light which must also be considered as additional information from a stakeholder's point of view, and be part of this license application. The proposal of new Interconnectors and additional dredging in the Thames Estuary will further reduce the amount of ground available to Fishermen, either temporarily or continuously, and will add to the cumulative impact already being felt.

Conclusion and objection.

Overall we feel the report fails on a commercial Fisheries level due to the information it overlooks as well as the information it includes. At the initial meetings between TFA and DHB, it was highlighted that the Fishermen have been misrepresented by more than one consultancy, their information has been gathered many times and either misconstrued or used against them.

The result of this, over many years, is a lack of trust for many consultancies, who generally seek as much of the Fishermen's data as possible in order to complete generic reports for applications such as this. Having discussed with DHB that the Fishermen's Association should gather the data for its own Fishermen in the correct manner, DHB instead elected to engage a Fisheries consultant who sought to interview the Fishermen individually, which was not accepted, and to gather various types of data including the financial income of each Fisherman. Ultimately the Fishermen's Association compiled the data from its member vessels and handed this over to consultant but most refused to give financial information (The report states 7 did give their turnover) and many would not give their additional Fishing grounds beyond the Goodwins for fear that they would be used for purposes other than the Goodwin Sands application, as in the past.

None of this is mentioned in the report therefore the projections on earnings, and activity compared to other grounds, are out of context and have little meaning to the Fishermen that work this area. Commercial Fishing, especially for the inshore sector, relies upon a great deal of flexibility. Changes in season, species and quotas mean different grounds are used in various combinations each year. While there are some trends within Fishing, these are not the same as trends ashore and are certainly not measurable by a value in pounds per square kilometre on such a local level. The report admits there is little information on the under 10m fleet but then goes on to draw conclusions on ground value and impact based upon this lack of information.

The Goodwin Sands application area is fished consistently, using specific methods, and is another loss of ground the inshore Fishermen can ill afford. The impact on the Fishermen will not be negligible and will not be limited to the dredge period, once the operation has taken what it needs the damage to the ground will be long lasting. On the basis of the above, while we do not object to the project that Dover is trying to achieve, we object to the dredging application for the Goodwin Sands in its entirety.

Yours sincerely,

M.W.Jackson.
Thanet Fishermen's Association.