



## **Southern Inshore Fisheries and Conservation Authority**

# **Black Seabream Marine Conservation Zone Assessment Package**

**Supporting Document for Black Seabream Management Package**

## Document Control

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24.11.25	S Birchenough	2.0	Updated draft	Following receipt of a request for additional information received from NE on 10.11.25 and subsequent response from Southern IFCA on 20.11.25 additional information has been added to provide clarity on rationale to support the information provided in the Assessment Package. The letter received from NE and Southern IFCA's response are included as Annexes 4 & 5 respectively, information related to specific points of clarity is included in purple text in the relevant section of this document (Section H).	P Bateman
04.12.25	S Birchenough	2.0	Final	Document accepted by Technical Advisory Sub-Committee at a meeting held on 4 <sup>th</sup> December 2025.	P Bateman

## Correspondence History

This document has been distributed for information and comment to:

Organisation	Name	Date Sent	Comments Received
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## Section A: Introduction

Black seabream (BSB) (*Spondyllosoma cantharus*) are a member of the Sparidae family (Dunn, 1999; Ruiz, 2008) and are protogynous hermaphrodites, starting out as female and changing to male at a certain age and size (Pajuelo and Lorenzo, 1999; Baldock and Dipper, 2023). The genus *Spondyllosoma* (which includes black seabream) is one of only two genera within the Sparidae family which provides male-only care in the form of nest building and guarding of eggs (Beaulieu, 2020). The evolution of parental care alongside protogyny is a novel evolutionary strategy (Beaulieu, 2020).

In the UK, BSB are most abundant along the south coast and into the southern part of the North Sea (Rogers, 1998). For the past century during the spring months, specifically along the Southern coast of the UK, BSB have been recorded within the following Marine Conservation Zones (MCZs): Poole Rocks, Purbeck Coast, and Southbourne Rough (Baldock & Dipper, 2023; Collins & Mallinson, 2012; Doggett and Baldock, 2022).

BSB are a designated feature in three MCZs in Dorset; Purbeck Coast, Poole Rocks and Southbourne Rough. This Conservation Assessment Package considers the requirement for management of relevant fishing activities to fulfil Southern IFCA's legal duties under the Marine and Coastal Access Act 2009 (MaCAA) with regard to the protection of MCZs.

### 1.0 Primary Policy Objective

#### Managing BSB as a designated feature of Marine Conservation Zones

##### 1.1 Scope

BSB were designated as features of the Purbeck Coast MCZ and Southbourne Rough MCZ during the second tranche of MCZ designations in 2019. At the same time, BSB were designated as an 'additional feature' for the Poole Rocks MCZ, a site originally designated under the first tranche of MCZ designations in 2013.

##### 1.2 Route of Designation

BSB are designated under Section 117(5) of the MaCAA to (1) **conserve diversity**, specifically due to their ecological significance (the reoccurring time and place of reproductive behaviours, considered to be of critical importance to the life cycle of BSB), where if not protected the BSB would be affected at population or sub-population level, & (2) **persistence** – where they occur at high densities in contrast to surrounding areas.

BSB are not designated under Section 117(4) of MaCAA as rare or threatened due to limited numbers or limited locations where the BSB are present.

The designation of BSB across the three Dorset MCZs in 2019 was not based on a Condition Assessment, instead Natural England (NE) undertook a vulnerability assessment as a proxy. NE deemed BSB to be vulnerable to bottom towed fishing gear (BTFG), netting and recreational angling and therefore considered BSB to be in an **unfavourable condition** and requiring management. No metrics have been provided by NE to quantify 'unfavourable condition'.

### 1.3 Relevant MCZs

The location of the three MCZs in Dorset with BSB as a designated feature are summarised below and shown in **Figure 1**.

- **Purbeck Coast MCZ<sup>1</sup>**
  - An inshore site which covers an area of 282km<sup>2</sup>, located in the Eastern channel stretching from Ringstead Bay in the west to Swanage Bay in the east along the Jurassic Coast World Heritage Site.
- **Poole Rocks MCZ<sup>2</sup>**
  - An inshore site which covers an area of around 4km<sup>2</sup>, lying to the east of the entrance to Poole Harbour and approximately 2-2.5km to the east of the beachfront at Sandbanks.
- **Southbourne Rough MCZ<sup>3</sup>**
  - An inshore site which covers an area of 5km<sup>2</sup>, located in an area of patchy reefs to the east of Poole Rocks MCZ in Poole Bay, slightly further offshore and deeper than Poole Rocks MCZ.

The relevant designated feature for each site is listed as follows:

MCZ	Designated Feature
Purbeck Coast	Black seabream (nesting)
Poole Rocks	Black seabream
Southbourne Rough	Black seabream (nesting)

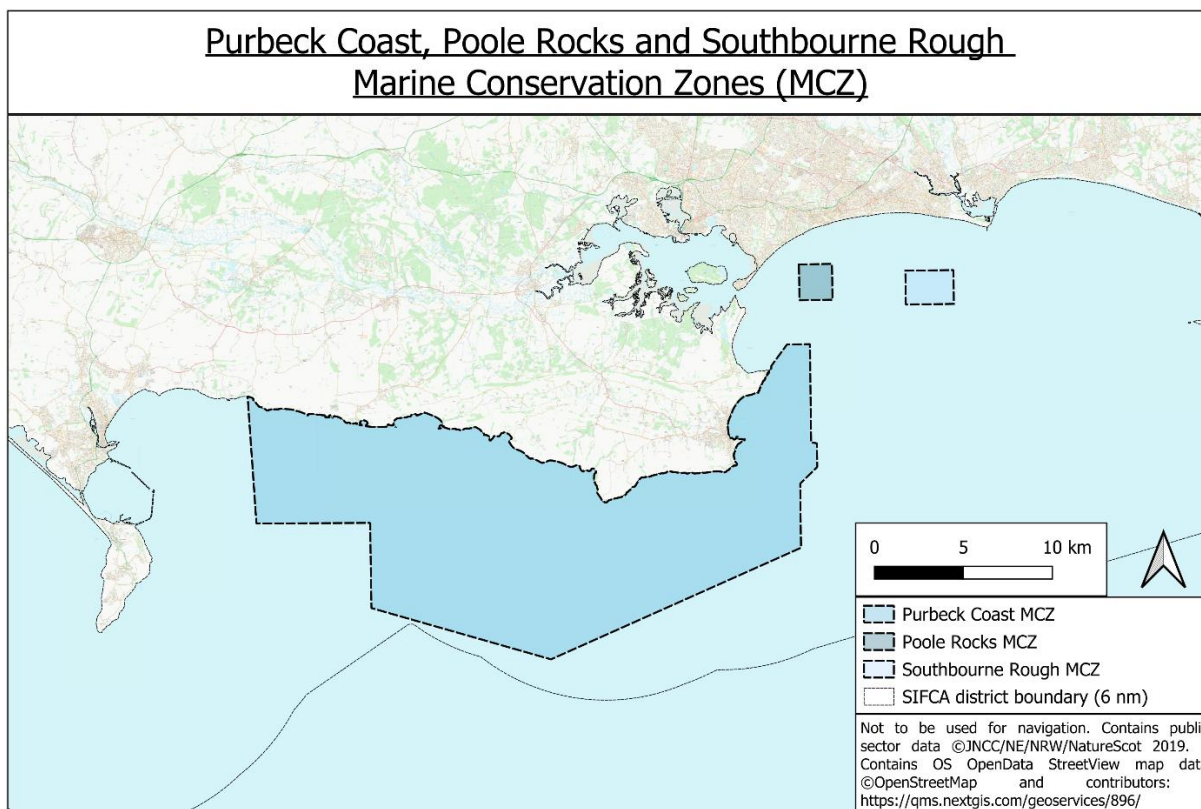
A full general description of each MCZ including all designated features and figures showing the best available evidence of the extent and location of designated features from the evidence package provided by NE to Southern IFCA in 2023 is provided in the **Black Seabream Site Specific Evidence Packages** supporting document.

Included in the **Black Seabream Site Specific Evidence Packages** is evidence of BSB using each of the MCZs. In order to ensure a full understanding of the best available evidence on the location and extent of BSB nests within each site, additional evidence sources to that provided by NE as the evidence package on designated feature location and extent (current version 2023) were interrogated. This was deemed necessary as the information available through the NE package was determined not to represent all the information which existed in peer-reviewed literature and from District specific studies and therefore did not constitute the full best available evidence base. The best available evidence used to inform nest locations for BSB are given in the Evidence Principles agreed by the Authority (see Section A 1.7 of this document) and this evidence is detailed in **Sections 1.3 (Purbeck Coast MCZ), 2.3 (Poole Rocks MCZ) and 3.3 (Southbourne Rough MCZ)** of the **Black Seabream Site Specific Evidence Packages**.

<sup>1</sup> [Marine Conservation Zones: Purbeck Coast - GOV.UK](#)

<sup>2</sup> [Marine conservation zones: Poole Rocks - GOV.UK](#)

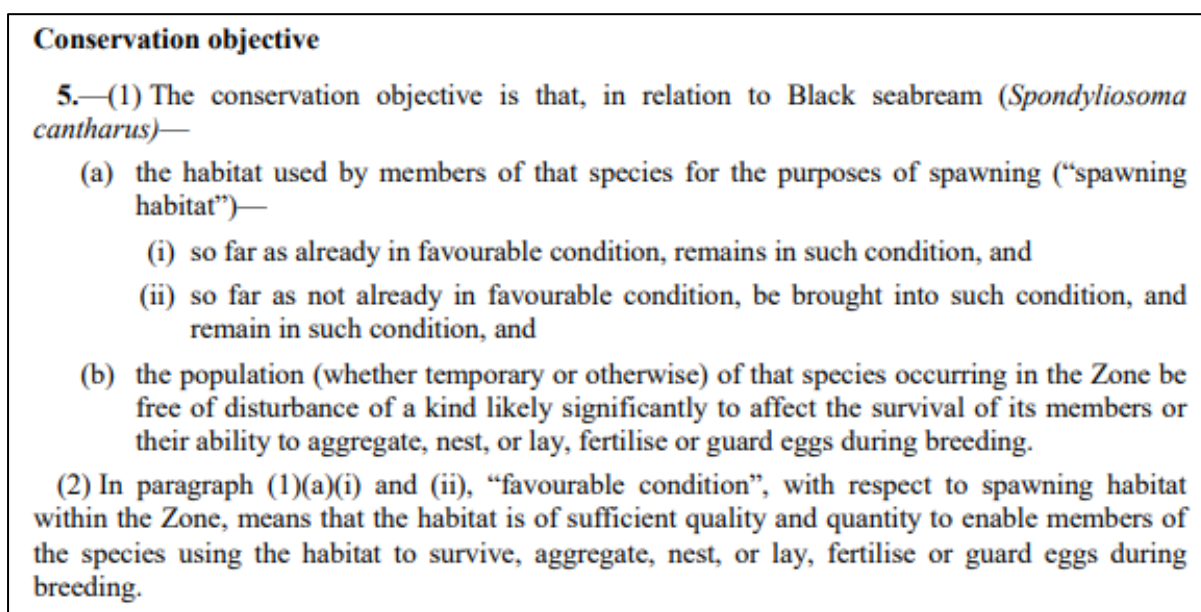
<sup>3</sup> [Marine Conservation Zones: Southbourne Rough - GOV.UK](#)



**Figure 1: Location of the three Dorset Marine Conservation Zones (MCZs) with Black Seabream as a designated feature; Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ.**

## 1.4 Conservation Objectives

For all three Dorset MCZs, the Conservation Objectives (COs) provided for BSB are given in **Figure 2** below.



**Figure 2: Conservation Objectives relevant to three Dorset MCZs**

## 1.5 Protection of Marine Conservation Zones: MaCAA Section 154 Duties

Under Section 154(1) of the MaCAA, Southern IFCA must “...seek to ensure that the conservation objectives of any MCZ in the District are furthered...”, with Section 154(2) requiring that “...nothing in Section 153(2) is to affect the performance of the duty...” This includes socio-economic considerations.

## 1.6 Focus Areas

In the absence of quantification of ‘unfavourable condition’, and in accordance with Southern IFCA’s Section 154 duties under MaCAA, the following **CO Focus Areas** (as identified via highlights in **Figure 3** and detailed in **Figure 4**) were identified to be used as metrics against which the Authority can demonstrate where and how any management interventions are furthering the COs of the MCZs for BSB.

In accordance with the best available evidence, the recognised **spawning/breeding season** is 1<sup>st</sup> April – 31<sup>st</sup> July, details of the best available evidence used to inform this is provided in the **Black Seabream Site Specific Evidence Packages** for each MCZ and in **Section 1.2.1 of the Black Seabream Literature Review**.

**Conservation objective**

5.—(1) The conservation objective is that, in relation to Black seabream (*Spondyliosoma cantharus*)—

- (a) the habitat used by members of that species for the purposes of spawning (“spawning habitat”)—
  - (i) so far as already in favourable condition, remains in such condition, and
  - (ii) so far as not already in favourable condition, be brought into such condition, and remain in such condition, and
- (b) the population (whether temporary or otherwise) of that species occurring in the Zone be free of disturbance of a kind likely significantly to affect the survival of its members or their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding.

(2) In paragraph (1)(a)(i) and (ii), “favourable condition”, with respect to spawning habitat within the Zone, means that the habitat is of sufficient quality and quantity to enable members of the species using the habitat to survive, aggregate, nest, or lay, fertilise or guard eggs during breeding.

Figure 3: Conservation Objectives relevant to the three Dorset MCZs with CO Focus Areas highlighted

**Conservation Objectives: Focus Areas**

- 1** spawning habitat used by BSB in the MCZ be of sufficient quality & quantity to enable BSB to survive, aggregate, nest, lay, fertilise or guard eggs during breeding.
- 2** the population of BSB occurring in the MCZ be free of disturbance of a kind likely significantly to affect the survival of its members.
- 3** the population of BSB occurring in the MCZ be free of disturbance of a kind likely significantly to affect their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding.

Figure 4: Identified CO Focus Areas

From the CO Focus Areas, and based on best available evidence, the following key definitions are taken:

- **‘spawning habitat’**: BSB nests
- **‘during breeding’**: 1<sup>st</sup> April to 31<sup>st</sup> July
- **‘likely significant’**: to probably happen or to be expected in a way that is easy to see or by a large amount
- **‘sufficient quality & quantity’**: defined by Spatial Principles agreed by the Authority (see Section A1.7 of this document)

## 1.7 Defining Principles

In order to facilitate the progression of management considerations the following Legislative, Evidence and Spatial Principles were developed as part of a series of Member Working Groups prior to ratification at the Technical Advisory Committee (TAC):

### Legislative

(1) **‘further’** will be defined as ‘to take to a greater degree or a more advanced stage’ in line with the Oxford English Dictionary definition

Under Section 154(1) of MaCAA, Southern IFCA must *‘...seek to ensure that the conservation objectives of any MCZ in the District are furthered...’*, Recognising the lack of a legal definition for ‘furthered’, the Authority agreed that ‘further’ and synonyms of, will be defined as **“to take to a greater degree or a more advanced stage”** in line with Oxford English Dictionary definition.

At the time of BSB designation across all 3 MCZs, management measures which were already affording BSB protections were not considered in the NE Vulnerability Assessment. As such, the Authority consider that any qualification of ‘furthering’ of the COs will be taken from a baseline position of no management.

### Evidence

Two Evidence Principles were developed in order to clarify the sources of best available evidence used to inform nest locations and detailed how any additional evidence received will be considered appropriately.

(2) The best available evidence used to inform nest locations for black seabream is that provided in:

- a) The Natural England designated features layer provided to Southern IFCA in 2023
- b) Data from Cefas Project Report for NE (2021)
- c) Data from Southern IFCA side scan sonar of Chapmans Pool (2016)
- d) Data collected by Collins, K. Side scan sonar survey (2010)

(3) Any additional evidence received after the 29<sup>th</sup> January 2024 will be considered during the period of formal byelaw consultation (where relevant) and then (subject to byelaw ratification), in subsequent byelaw reviews, as determined under the provisions of the byelaw.

When considering wider spawning habitat, i.e., the habitat type which may be suitable for BSB nests, it was determined that there was no evidence available to indicate where this habitat type may occur within the three MCZs. Southern IFCA also undertook specific work with the recreational angling sector to better understand fishing patterns and practice for BSB within the three MCZs, this data is provided in the **Black Seabream Supporting Evidence Packages** and was used to inform understandings of activity as part of the Part B

Assessments. It is identified that there are significant evidence gaps on the location and extent of BSB nests within the three MCZs, by compiling multiple sources of evidence as listed under Principle (2), Southern IFCA have created a best available evidence base on which to base management considerations.

## **Spatial**

Six Spatial Principles were developed to describe the process by which ‘Indicative Habitat Areas’ have been developed, which used the best available evidence and adopted a precautionary approach recognising the need to achieve ‘**sufficient quality & quantity**’ of habitat, as specified in the CO.

(4) In accordance with the best available evidence, three data types are to be used to identify nest locations. ‘Nest Data’

- a) Individual nests (Cefas and NE data)
- b) Polygon data (Southern IFCA data)
- c) Nest areas of 50m x 50m where nest(s) have been noted to occur (Collins, K. data)

(5) A 10m buffer will be added to all nest locations to account for confidence in GPS accuracy. This will be referred to as ‘GPS Buffer’.

(6) Nest data and GPS Buffer combined will be called ‘Nest Units’

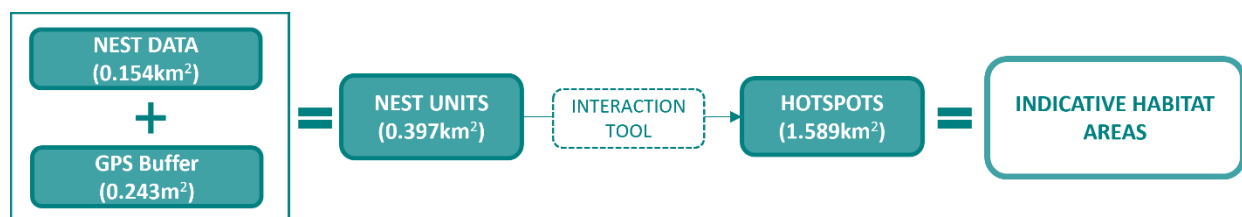
(7) Three or more Nest Units existing within 320m of another will be grouped using straight lines to form ‘Hotspots’.

(8) Collectively principles 4-7 build to provide ‘Indicative Habitat Areas’.

(9) Management will be considered within ‘Indicative Habitat Areas’.

From the best available evidence listed in the Evidence Principle, it was determined that there was collectively 0.154km<sup>2</sup> of ‘Nest Data’ across the three MCZs (equivalent to 21 football pitches).

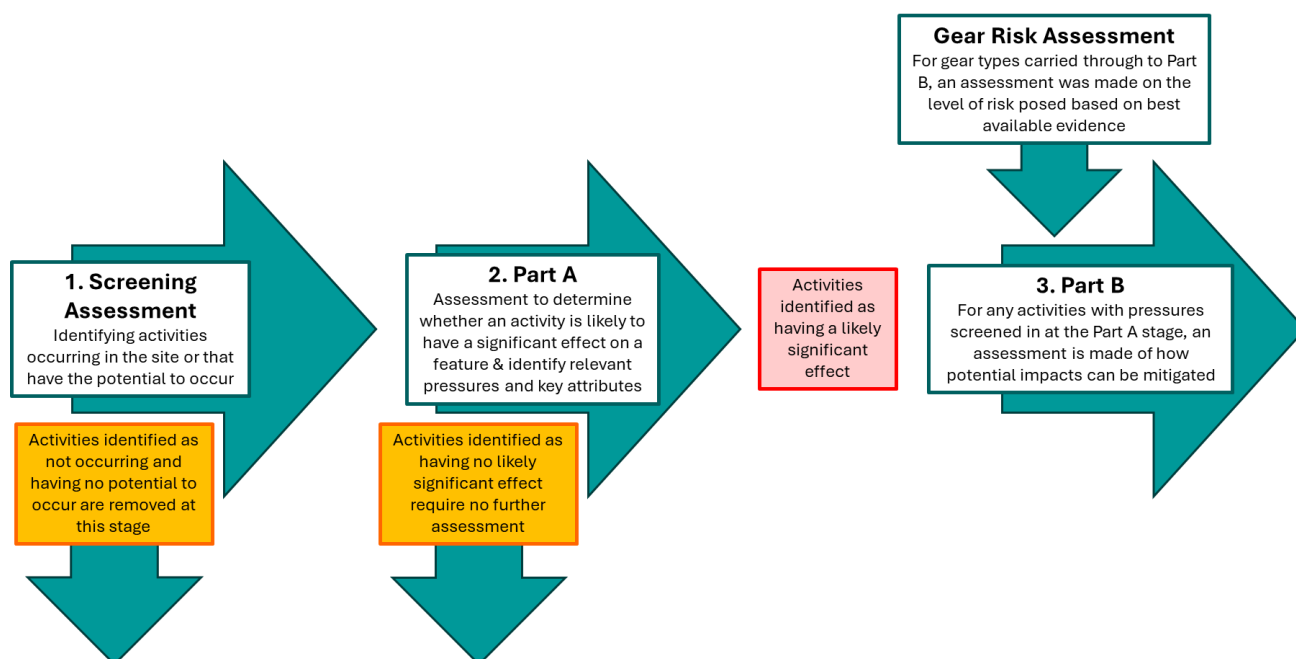
Collectively, the 13 Indicative Habitat Areas covered 1.589km<sup>2</sup> (equivalent to 222 football pitches).



## Section B: The MCZ Assessment Process

This section details the MCZ Assessment process undertaken to assess different fishing gear types against the designated feature of BSB within the three Dorset MCZs. The MCZ Assessment is a determination of whether, in the view of the Authority, management measures are required to achieve legal duties under MaCAA (154) and, whether the measures in place or proposed is appropriate in mitigating any identified risk to the achievement of the COs.

The assessment was undertaken following a stepwise process:



### 1.0 Supporting Documentation

This Conservation Assessment Package is to be read in conjunction with the following supporting documents (where applicable reference to specific sections of these documents have been highlighted):

- **Black Seabream Site Specific Evidence Packages**
- **Black Seabream Literature Review**

In addition, the Assessments in this package have been informed by<sup>4</sup>:

- The Black Seabream Site Activity Screening Document
- The Black Seabream MCZ Assessments: Part A Document

<sup>4</sup> Note that these documents are provided to Natural England in order to inform the provision of Formal Advice on the conclusions of the Conservation Assessments, these documents can be made available on request.

## 2.0 Screening Assessment Outcomes

The Screening Assessment was carried out for each MCZ against the following gear categories:

- **Bottom Towed Fishing Gear**
  - Towed (demersal)
  - Towed (pelagic)
  - Dredges (towed)
  - Dredges (other, i.e., suction)
- **Intertidal Handwork**
  - Hand working (access from a vessel)
  - Hand working (access from land)
  - Mechanical hand working
- **Static Pots/Traps**
  - Pots/Creels (crustacea/gastropods)
  - Cuttle Pots
  - Fish Traps
- **Demersal Nets**
  - Static – Fixed Nets
    - Gill Nets
    - Trammels
    - Entangling
  - Demersal Seines
  - Beach Seines/Ring Nets
- **Pelagic Nets**
  - Drift Nets
- **Other**
  - Purse Seine
  - Shrimp Push Nets
  - Fyke and Stake Nets
- **Lines**
  - Longlines (demersal)
  - Longlines (pelagic)
  - Handlines (rod/gurdy etc.)
  - Jigging/Trolling
- **Diving**
  - Commercial Diving

The outcome of the Screening Assessment resulted in the activities listed in **Table 1** being taken forward to a Part A Assessment.

From the activities taken forward, this has then been translated to the relevant category of gear type provided by NE through the Conservation Advice for the site, given as 'Advice on Operations' (AoO). When conducting the Part A Assessment, the AoO is used to determine relevant pressures and make an assessment of the potential for likely significant impact.

**Table 1: Outcomes of the Screening Assessment for the three Dorset MCZs**

MCZ Site Name	Activity	Relevant Advice on Operations
Purbeck Coast	Towed (Demersal)	• Demersal Trawl
	Pots/Creels (crustacean/gastropod)	• Traps
	Cuttle Pots	
	Static – Fixed Nets (all)	• Anchored Nets/Lines • Pelagic Fishing
	Drift Nets	
	Lines (all)	
	Diving	• Diving
Poole Rocks	Pots/Creels (crustacean/gastropod)	• Traps
	Cuttle Pots	
	Static – Fixed Nets (all)	• Anchored Nets/Lines • Pelagic Fishing
	Drift Nets	
	Lines (all)	
Southbourne Rough	Pots/Creels (crustacean/gastropod)	• Traps
	Static – Fixed Nets (all)	• Anchored Nets/Lines • Pelagic Fishing
	Handlines (rod/gurdy etc.)	
	Jigging/Trolling	
	Diving	• Diving

### 3.0 Part A Assessments

For the relevant AoO identified through the Screening Process, Part A Assessments were carried out for each MCZ.

For each assessment, each type of activity was assessed with respect to the potential pressures which may be exerted on designated features. The assessment was undertaken using the AoO and Supplementary Advice provided by NE for each site. The AoO provides a broadscale assessment of the sensitivity of designated features to different activity-derived pressures, using nationally available evidence on their resilience (ability to recover) and resistance (the level of tolerance) to physical, chemical and biological pressures. The broadscale assessment of sensitivity to the pressures is measured against a benchmark. It should be noted that these benchmarks are not representative of the likely intensity of a pressure cause by typical activities, and do not represent a threshold of an ‘acceptable’ intensity of a pressure. It is therefore necessary to consider the specifics of the activity being assessed as they are relevant to the Southern IFCA District, i.e., assessing the potential for a significant effect of a pressure on a feature using knowledge of activity levels, occurrence, intensity, gear type, operation etc. The determination of whether a pressure/feature interaction needs to be carried forward to the Part B Assessment stage considers this site and District-specific detail alongside the broader AoO.

The Part A Assessments for Southbourne Rough and Purbeck Coast in relation to BTFG were carried out as part of the Southern IFCA BTFG Review Phase I. The Part A Assessments have however also been included in the Part A Assessments conducted as part of this package given the relevance of these assessments to the consideration of BSB as a designated feature of the Southbourne Rough and Purbeck Coast MCZs. The two Part A Assessments have been updated to reflect management introduced in 2025 under the Bottom Towed Fishing Gear Byelaw 2023 and any Formal Advice received from NE on these assessments through the BTFG Review Phase I has been referenced as needed.

The outcomes of the Part A Assessments identified the following pressures as having a potential likely significant effect:

**Anchored Nets/Lines** (*same for all three MCZs*)

- Abrasion
- Removal of non-target species
- Removal of target species

**Pelagic Fishing** (*same for all three MCZs*)

- Removal of non-target species
- Removal of target species

**Traps** (*same for all three MCZs*)

- Abrasion

**Demersal Trawl** (*Southbourne Rough MCZ only*)

- Abrasion
- Removal of non-target species
- Removal of target species
- Smothering and siltation rate changes (light)

**Table 2** below provides a summary of the outputs of these assessments for each site for Anchored Nets/Lines, Pelagic Fishing and Traps, indicating the pressures which may exert a significant impact, the rationale for screening into the next stage in the assessment process and the relevant attributes listed by NE in the Supplementary Advice for designated sites which may be affected by the exertion of that pressures on that feature.

**Table 2: Summary of outcomes for the Part A Assessments for Anchored Nets/Lines, Pelagic Fishing and Traps.**

<b>Advice on Operations: Anchored Nets/Lines</b>			
<b>Potential Pressure</b>	<b>Relevant MCZ</b>	<b>Rationale</b>	<b>Relevant Attributes</b>
Abrasion/disturbance on the surface of the seabed	<ul style="list-style-type: none"> <li>• Purbeck Coast</li> <li>• Poole Rocks</li> <li>• Southbourne Rough</li> </ul>	There is potential for the activity to cause abrasion over areas where BSB nests occur. There is however limited overlap between areas where BSB nests have been identified and anchored netting activity.	Nest abundance Population: age/size frequency Population: population size Population: recruitment and reproductive capability Presence and spatial distribution of the species Supporting habitat: extent and distribution
Removal of non-target species		BSB may be caught by the activity as a non-target species by either recreational or commercial operators.	
Removal of target species		BSB may be caught by the activity as a target species by either recreational or commercial operators.	
<b>Advice on Operations: Pelagic Fishing (or fishing activities that do not interact with the sea bed)</b>			
Removal of non-target species	<ul style="list-style-type: none"> <li>• Purbeck Coast</li> <li>• Poole Rocks</li> <li>• Southbourne Rough</li> </ul>	BSB may be caught by the activity as a non-target species by either recreational or commercial operators.	Population: age/size frequency Population: population size Population: recruitment and reproductive capability Presence and spatial distribution of the species
Removal of target species		BSB may be caught by the activity as a target species by either recreational or commercial operators.	
<b>Advice on Operations: Traps</b>			
Abrasion/disturbance on the surface of the seabed	<ul style="list-style-type: none"> <li>• Purbeck Coast</li> <li>• Poole Rocks</li> <li>• Southbourne Rough</li> </ul>	There is the potential for the activity to cause abrasion over areas where BSB nests have been identified.	Nest abundance Population: recruitment and reproductive capability Supporting habitat: extent and distribution

### 3.1 Part A Assessment Outcomes – Demersal Trawl

Under the Part A Assessments carried out for the BTFG Review: Phase I, the following conclusions were reached:

#### Purbeck Coast MCZ

All pressures were screened out at the Part A Assessment stage on the basis of the best available evidence on the location and extent of BSB nests within the site being within an area prohibited to all forms of BTFG under the Southern IFCA BTFG Byelaw 2016 (covering 90% of the site due to management for the Studland to Portland Special Area of Conservation). It was identified that the small remaining area of the site not closed to BTFG was not known to meet the habitat requirements to be suitable for BSB nesting sites.

The Part A Assessment was submitted to NE for Formal Advice on 7<sup>th</sup> October 2019, a formal statutory response was received from NE on 26<sup>th</sup> November 2019 stating “we note that bottom towed fishing gear impacts upon black seabream have been screened out as the activity does not overlap with nesting sites. Natural England agrees with this approach”.

The Part A Assessment has been reviewed and updated following the ratification of the BTFG Byelaw 2023 in July 2025 which resulted in increased prohibitions for BTFG for the Purbeck Coast MCZ, extending the area of the site which is prohibited to all forms of BTFG to 93%. On this basis, and in consideration of the best available evidence used to inform the location and extent of BSB nests within the site, it is determined that the conclusion of the Part A Assessment review by NE is still valid and therefore no further assessment is required. It is noted that whilst nests or suitable nesting habitat is not identified to occur within the extended prohibition area under the BTFG Byelaw 2023, the inclusion of additional prohibition areas provides additional potential protection to BSB from removal as non-target or target species.

#### Southbourne Rough MCZ

Under the Part A Assessment, the pressures of abrasion/disturbance of the substrate on the surface of the seabed, removal of non-target species, removal of target-species and smothering & siltation rate changes (light) were identified as relevant pressures for the gear type ‘demersal trawl’. A summary is provided in **Table 3** below:

**Table 3: Summary of outcomes for the Part A Assessment for Southbourne Rough MCZ for Demersal Trawl**

Advice on Operations: Demersal Trawl		
Potential Pressure	Rationale	Relevant Attributes
Abrasion/disturbance on the surface of the seabed	The gear type is known to cause abrasion and disturbance to the seabed. Male BSB clear a patch of sediment to use as a nest site, the gear type has the potential to move cleared sediment areas, destroying the nest and to smother and destroy eggs.	Nest abundance Population: age/size frequency Population: population size Population: recruitment and reproductive capability
Removal of non-target species	Impacts on the feature may occur through the removal of the feature as a non-target species.	Presence and spatial distribution of the species Supporting habitat: extent and distribution
Removal of target species	Impacts on the feature may occur through the removal of the feature as a target species.	Supporting processes: water quality - turbidity
Smothering and siltation rate changes (light)	The gear type has the potential to move and increase sediment around nest areas, destroying the nest and smothering and destroying the eggs.	

The Part A Assessment was submitted to NE for Formal Advice on 7<sup>th</sup> October 2019, a formal statutory response was received from NE on 26<sup>th</sup> November 2019 supporting the conclusion that a Part B Assessment was required. A Part B Assessment was carried out by Southern IFCA titled ‘Southbourne Rough MCZ – Part B Assessment – 001 BTFG Bream nest v.1.4’<sup>5</sup> for which Formal Advice was sought from NE on 7<sup>th</sup> February 2020. A formal statutory response was received on 6<sup>th</sup> May 2020. The advice received supported the conclusion of Southern IFCA that demersal trawling was likely to pose a significant risk to the feature and agreed with proposed mitigation to introduce BTFG prohibition across the whole site to protect the feature.

The Part A Assessment has been reviewed and updated following the ratification of the BTFG Byelaw 2023 which introduced a prohibition for BTFG across the extent of the site. On this basis there is no requirement for further assessment.

## 4.0 Gear Risk Assessment

Following the completion of the Part A Assessments, it was determined that an assessment would be made of the risk posed by relevant gear types to provide context to the consideration of those gear types under a Part B Assessment. As outlined in Section B3.0, there is a need to consider site specific information alongside the broadscale information provided by the Conservation Advice and specifically the Advice on Operations for each gear type in relation to a particular feature. In order to ensure full transparency in the site specific considerations for different gear types, the gear risk assessment was carried out following the Part A Assessment stage to fully explore the level of risk posed by each relevant gear type and how this would contribute to the consideration of appropriate mitigation to meet Southern IFCA’s duties under MaCAA (154) under a Part B Assessment.

The risk levels determined for each gear type by this exercise are given in **Table 4** below. Full rationale for each risk level is given in the table in **Annex 2**. The risk levels were determined using best available evidence including on fishing effort and location provided in the **Black Seabream Site Specific Evidence Packages**, commercial landings and peer-reviewed literature provided in the **Black Seabream Literature Review**.

The information provided in Annex 2 allows the following pressures to be removed for the following gear types:

### **Anchored Nets/Lines** (*same for all three MCZs*)

- Abrasion
- Removal of non-target species
- Removal of target species

### **Pelagic Fishing** (*same for all three MCZs*)

- Removal of non-target species
- Removal of target species

### **Traps** (*same for all three MCZs*)

- Abrasion

### **Demersal Trawl** (*Southbourne Rough MCZ only*)

- Abrasion
- Removal of non-target species
- Removal of target species
- Smothering and siltation rate changes (light)

<sup>5</sup> [Southbourne-Rough-BTFG-Bream.pdf](#)

Resulting in the removal of 'Traps' and associated forms of pot fishing from the need for a Part B Assessment and the narrowing of relevant pressures for Anchored Nets/Lines to 'removal of non-target species' and 'removal of target species'.

**Table 4: Risk levels assigned to relevant gear types in relation to the feature of BSB**

<b>Gear Type</b>	<b>Sector</b>	<b>Pressure</b>	<b>Risk</b>
BTFG	Commercial	Abrasion	HIGH
		Removal Non-Target	HIGH
		Removal Target	HIGH
		Smothering & Siltation	HIGH
Pot Fishing	Commercial	Abrasion	LOW
Nets – Demersal – Drift Nets	Commercial	Abrasion	LOW
		Removal Non-Target	LOW
		Removal Target	LOW
Nets – Demersal – Fixed Nets	Commercial	Abrasion	LOW
		Removal Non-Target	LOW
		Removal Target	LOW
Nets – Pelagic – Drift Nets	Commercial	Removal Non-Target	LOW
		Removal Target	LOW
Lines – Demersal – Longlines	Commercial	Abrasion	LOW
		Removal Non-Target	LOW
		Removal Target	LOW
Lines – Pelagic – Longlines	Commercial	Removal Non-Target	LOW
		Removal Target	LOW
Lines – Pelagic – Rod & Line	Commercial	Removal Non-Target (including jigging/trolling)	LOW
		Removal Target	LOW
	Recreational	Removal Non-Target (including jigging/trolling)	MED
		Removal Target	MED

## Section C: Management Solutions

### 1.0 Existing Statutory Measures

Under the **Southern IFCA BTFG Byelaw 2016**, protections are afforded to BSB through prohibition areas within which all types of BTFG are prohibited at all times and the passage of a vessel through these areas carrying BTFG is also managed (**Figure 5**).

#### Bottom Towed Fishing Gear Byelaw 2016

##### Prohibition

- A person must not...use bottom towed fishing gear within a prohibited area
- A person must not...use a vessel carrying bottom towed fishing gear while transiting through a prohibited area unless all parts of that gear are inboard and above the sea

*Figure 5: Prohibitions as listed in the Southern IFCA Bottom Towed Fishing Gear Byelaw 2016*

The prohibitions under this Byelaw provide whole site protection for Poole Rocks MCZ from BTFG (100% closure), and for 90% of Purbeck Coast MCZ by virtue of prohibitions introduced for designated features of the Studland to Portland Special Area of Conservation (SAC).

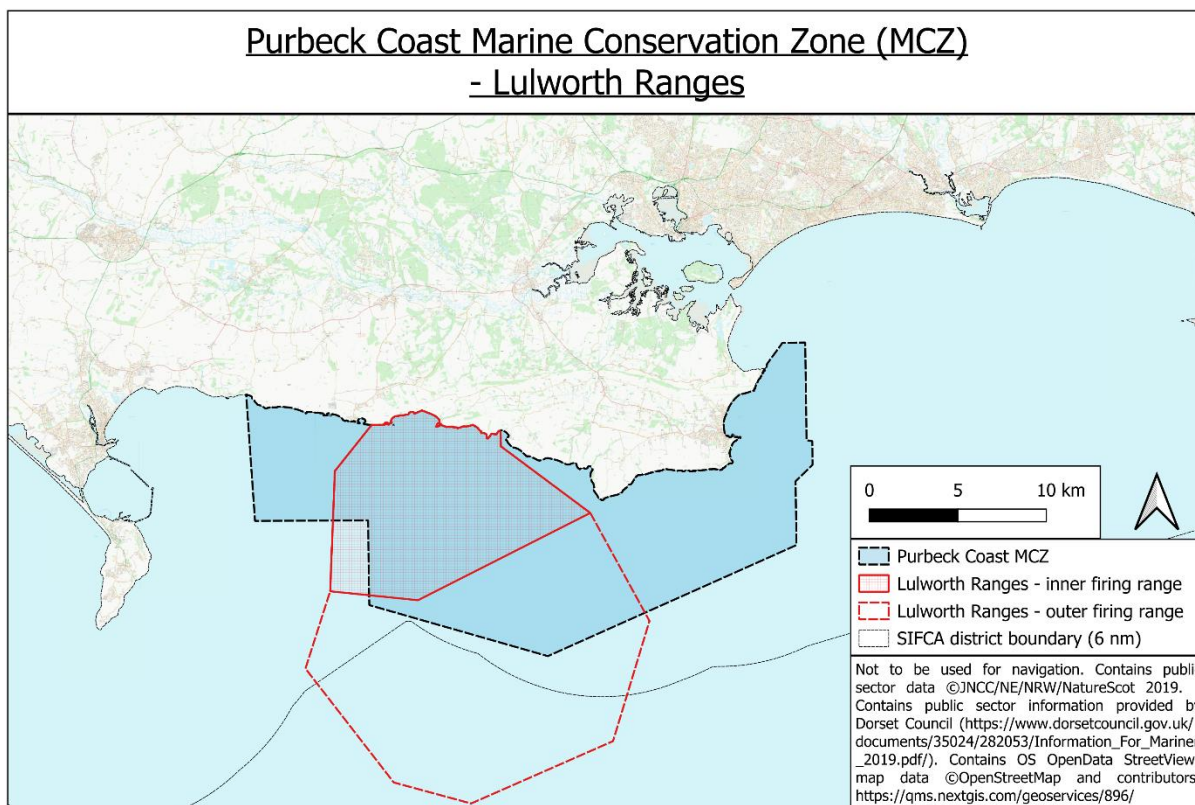
The **Southern IFCA Minimum Conservation Reference Size Byelaw** provides a MCRS for BSB at 23cm. There is no national MCRS for BSB therefore the MCRS Byelaw provides protections for this species specifically within the Southern IFCA District. The Byelaw extends the MCRS application beyond the immediate act of fishing for or taking the species, prohibiting a person from removing from the fishery, retaining on board, transhipping, landing, transporting, storing, selling, displaying or offering for sale BSB from a fishery within the District<sup>6</sup>.

### 2.0 Existing External Measures

There are additional measures restricting fishing activity in place by the Ministry of Defence for the largest of the three MCZs, Purbeck Coast MCZ. These restrictions are for the Lulworth Firing Ranges and comprise an area referred to as the 'Inner Ranges' and an area referred to as the 'Outer Ranges'. The combined area of the Inner and Outer Ranges is 151.8km<sup>2</sup> covering 53.8% of the Purbeck Coast MCZ (**Figure 6**). The Inner Ranges area covers 92.8km<sup>2</sup> (32.8%) and the Outer Ranges 59.0km<sup>2</sup> (21.0%). Information is available online for the closure periods for the Inner Ranges area, which is closed during the week and at certain weekends (outside of public holidays and defined stand down periods). During the closure periods all vessels, including all fishing activities, are prohibited from operating within the Inner Ranges area. The Outer Ranges area does not have specific information provided for closure periods but is closed periodically to all vessels.

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<sup>6</sup> [SIFCA-MCRS-Byelaw.pdf](#)



**Figure 6: Purbeck Coast MCZ (blue) overlaid with the area of the Lulworth Firing Ranges showing the Inner Ranges (red hashed) and the Outer Ranges (red dashed outline)**

Based on information for the Inner Ranges from 2025 for the period 1<sup>st</sup> April to 31<sup>st</sup> July, the area was closed to fishing activity for 32% of the total time available (based on total hours available during that period and a fishing pattern of activity predominantly occurring between 0400-1800 at a maximum). For 2026 based on closure patterns it is anticipated that the Inner Ranges area will be closed to fishing activity for 33% of the total time available (using the same calculation as for 2025). When looking at days, out of 122 days (1<sup>st</sup> April to 31<sup>st</sup> July), in 2025 the Inner Ranges were closed for a day period (7.5 hours) for 55 days (45%) and in 2026 an anticipated 57 days (47%). Whilst it is recognised that the day closures are not 24 hours in length, cutting out a large proportion of daytime hours will make fishing activities unviable to take place on those days from a commercial perspective and will make it unlikely that the area would be used by Charter Vessels or Recreational Angling Vessels on those days.

### 3.0 Development of New Statutory Measures

Between 2020 and 2023 the **Southern IFCA BTFG Byelaw 2023**<sup>7</sup> was developed and made by the Authority in order to satisfy multiple aims. The new Byelaw replaced the BTFG Byelaw 2016 and introduced new prohibition areas and extensions to existing prohibition areas across the District. Under the Byelaw, extended protections are afforded to BSB through prohibition areas within which all types of BTFG are prohibited at all times, the passage of a vessel through the prohibited areas carrying BTFG also continues to be managed (**Figure 7**).

<sup>7</sup> [BTFG-Byelaw-2023-signed.pdf](#)

## Bottom Towed Fishing Gear Byelaw 2023

### Prohibition

- A person must not...use bottom towed fishing gear within a prohibited area
- A person must not...use a vessel carrying bottom towed fishing gear while transiting through a prohibited area unless all parts of that gear are inboard and above the sea

Figure 7: Prohibitions as listed in the Southern IFCA Bottom Towed Fishing Gear Byelaw 2023

The prohibitions under this Byelaw maintain the whole site protection for Poole Rocks MCZ from BTFG (100% closure), extend the protections for Purbeck Coast MCZ to cover 93% of the site and introduce new whole site protection for Southbourne Rough MCZ in line with the conclusion of the Part B Assessment carried out for this site under the BTFG Review: Phase I (100% closure). For Purbeck Coast MCZ, the determination of the area of the site requiring a prohibition is based on feature-based management of designated features within MCZs in line with Southern IFCA's legal duties and the process for delivering management under the BTFG Review: Phase I. The area remaining open to BTFG is due to their either being no evidence of the location of a designated feature within that area (eastern part of the site) or a lack of confidence in the data indicating the presence of a designated feature (towards the western part of the site), the approach and resulting management has been agreed by NE through the BTFG Review: Phase I process and consideration of relevant MCZ Assessments. The prohibition areas under the BTFG Byelaw 2023 overlaid with the three Dorset MCZs is shown in **Figure 8**.

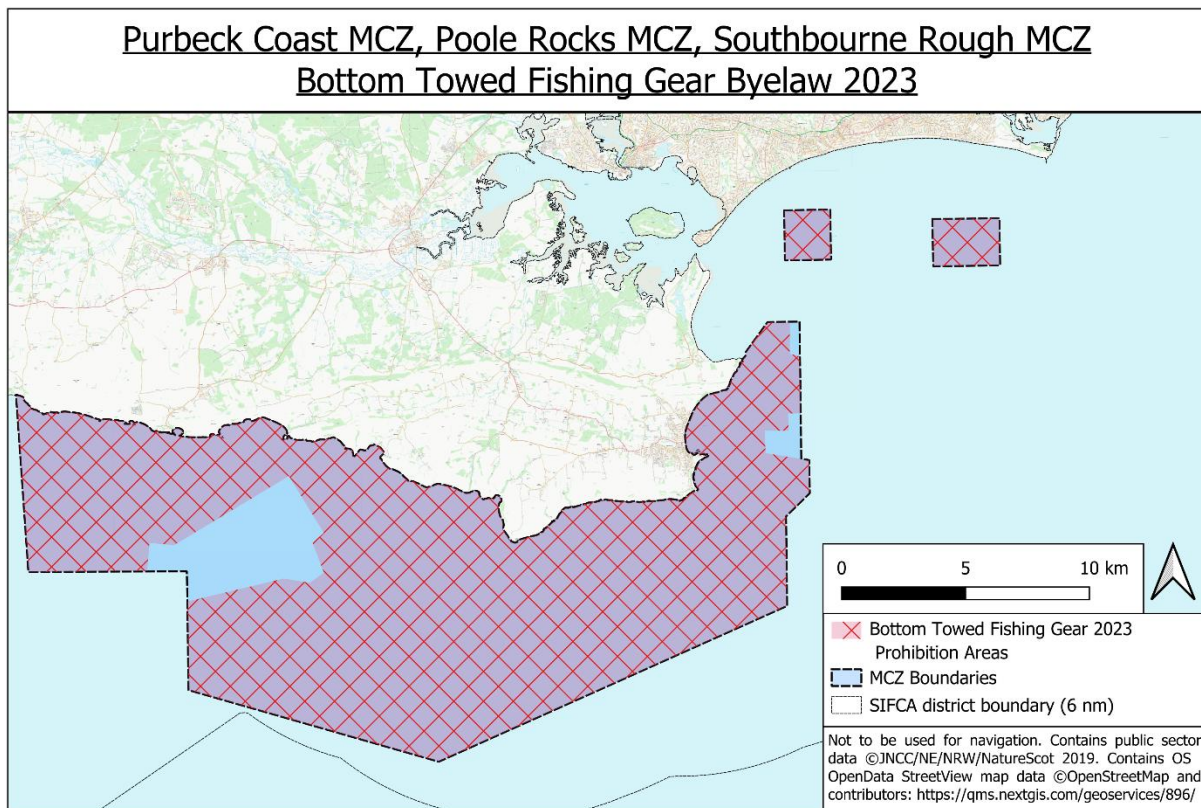


Figure 8: MCZ boundaries for Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ (grey) overlaid with the relevant prohibition areas under the Southern IFCA Bottom Towed Fishing Gear Byelaw 2023

## Section D: Part B Assessments

The aim of the Part B Assessments is to ensure that activities will not prevent the furthering of COs. The following information and evidence were used to carry out the required Part B Assessments, where information can be found in a supporting document this is indicated.

Evidence Type	Relevant Document
<b>Policy</b>	
CO Focus Areas	<b>Section A1.6 of this document</b>
Legislative, Evidence & Spatial Principles	<b>Section A1.7 of this document</b>
<b>Site Specific</b>	
Gear Risk Assessment	<b>Section B4.0 of this document</b>
Feature location & extent	<b>Black Seabream Site Specific Evidence Packages</b>
Additional evidence of BSB using the site	
Fishing activity location & effort	
Records of catch levels from Southern IFCA RSA Project	
Seasonality	<b>Black Seabream Site Specific Evidence Packages</b>  <b>Black Seabream Literature Review</b>
<b>General</b>	
Trends in BSB catches (commercial)	<b>Black Seabream Literature Review</b>
Historic RSA competition records related to BSB	
Evidence from peer-reviewed literature on BSB biology, ecology and potential impacts from fishing activity	
Existing and newly developed statutory management which applies across relevant areas (Southern IFCA)	<b>Section C1.0 &amp; C3.0 of this document</b>
Existing statutory management by other authorities	<b>Section C2.0 of this document</b>

Considering the **CO Focus Areas**, used as metrics against which the Authority can demonstrate where and how any management interventions are furthering the COs of the MCZs, the existing and newly developed statutory management across the three MCZs provides the following protections to BSB:

### Bottom Towed Fishing Gear Byelaw 2016

Under the BTFG Byelaw 2016, spatial protections were provided which eliminated, to the following degrees, the activity deemed to pose the highest risk (**risk rating from Gear Risk Assessment = HIGH**) to achieving each of the CO Focus Areas with 100% protection provided for Poole Rocks MCZ and 90% protection provided for Purbeck Coast MCZ (**Figure 9**).

1	<b>Poole Rocks MCZ:</b>	<b>whole site protection for 12 months a year (100% closure to BTFG)</b>
	<b>Purbeck MCZ:</b>	<b>90% closure to BTFG for 12 months a year</b>
	<b>Southbourne Rough:</b>	<b>No protections under this byelaw</b>
2	<b>Poole Rocks MCZ:</b>	<b>whole site protection for 12 months a year (100% closure to BTFG)</b>
	<b>Purbeck MCZ:</b>	<b>90% closure to BTFG for 12 months a year</b>
	<b>Southbourne Rough:</b>	<b>No protections under this byelaw</b>
3	<b>Poole Rocks MCZ:</b>	<b>whole site protection for 12 months a year (100% closure to BTFG)</b>
	<b>Purbeck MCZ:</b>	<b>90% closure to BTFG for 12 months a year</b>
	<b>Southbourne Rough:</b>	<b>No protections under this byelaw</b>

Figure 9: CO Focus Areas (1-3) supported by management interventions provided by the BTFG Byelaw 2016

### Bottom Towed Fishing Gear 2023

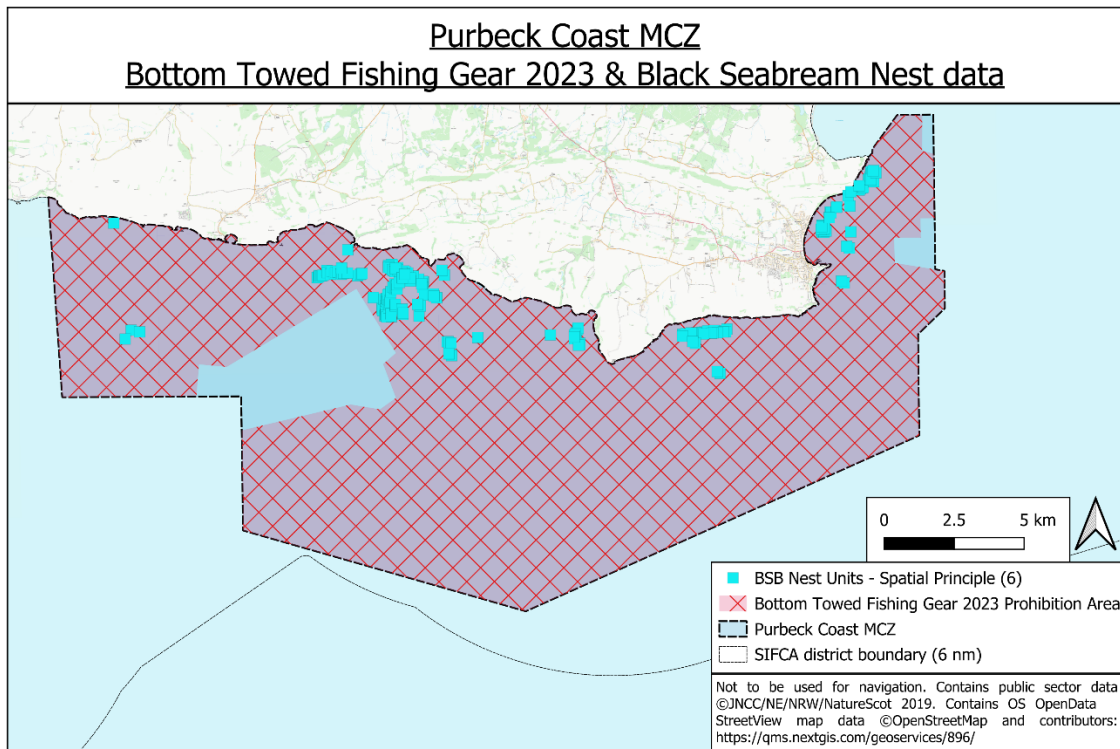
In 2025 the BTFG Byelaw 2016 was revoked and replaced by the BTFG Byelaw 2023, this byelaw provides increased spatial protections which increased the degree to which the activity deemed to pose the highest risk to achieving the CO Focus Areas is eliminated, providing such protections across all three MCZs, two at 100% (Poole Rocks MCZ and Southbourne Rough MCZ) and at 93% in Purbeck Coast MCZ, the remaining area, as agreed by Natural England, posing no risk to BSB due to the absence of nest areas and suitable habitat in the area which remains open. **Figure 10** below illustrates the additional protections provided by the BTFG Byelaw 2023, recognising that the protections outlined in **Figure 9** for Poole Rocks are also maintained.

1	<b>Purbeck MCZ:</b>	<b>Increase to 93% closure to BTFG for 12 months a year</b> (100% not achievable due to unreliable NE data)
	<b>Southbourne Rough:</b>	<b>Introduction of whole site protection for 12 months a year (100% closure to BTFG)</b>
2	<b>Purbeck MCZ:</b>	<b>Increase to 93% closure to BTFG for 12 months a year</b> (100% not achievable due to unreliable NE data)
	<b>Southbourne Rough:</b>	<b>Introduction of whole site protection for 12 months a year (100% closure to BTFG)</b>
3	<b>Purbeck MCZ:</b>	<b>Increase to 93% closure to BTFG for 12 months a year</b> (100% not achievable due to unreliable NE data)
	<b>Southbourne Rough:</b>	<b>Introduction of whole site protection for 12 months a year (100% closure to BTFG)</b>

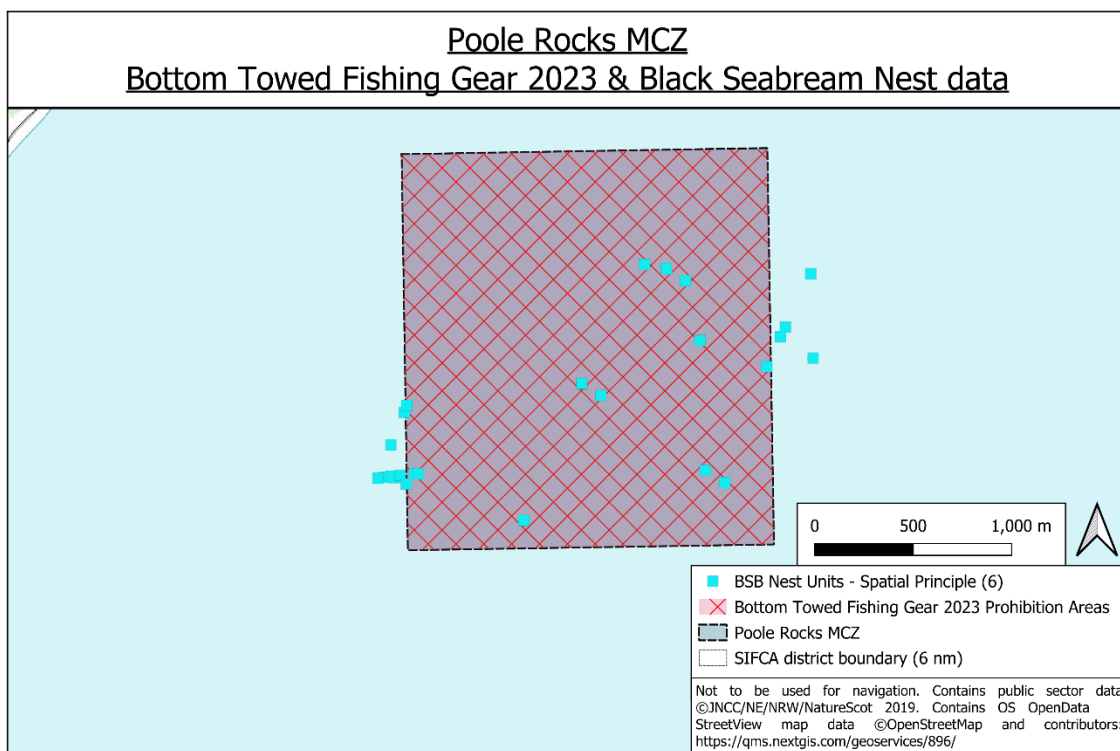
Figure 10: CO Focus Areas (1-3) supported by management interventions introduced under the BTFG Byelaw 2023, in addition to that already in place under the BTFG Byelaw 2016

BTFG protections apply year-round and therefore offer extended protection to BSB populations beyond the identified breeding season.

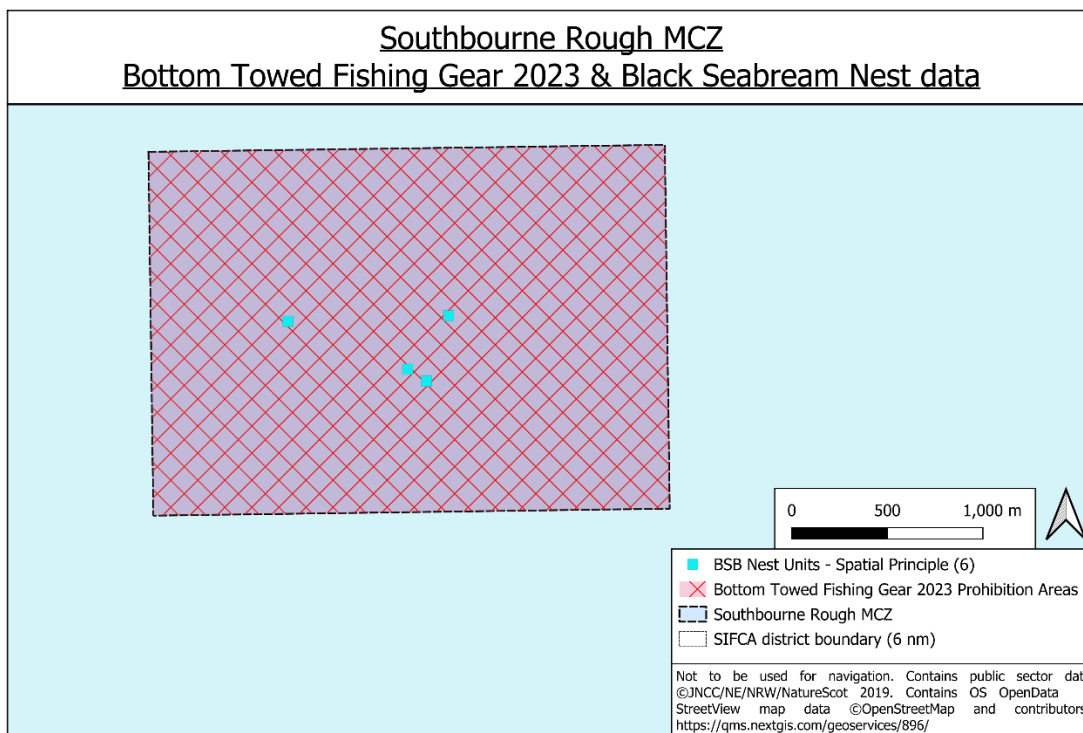
**Figure 11 to Figure 13** show each site with the overlaid BTFG Byelaw 2023 prohibition areas and the 'Nest Units' as defined under the **Spatial Principles** based on the best available evidence defined in the **Evidence Principles**. 100% of identified BSB nests within MCZs based on best available evidence are found within prohibition areas for BTFG.



**Figure 11: Purbeck Coast MCZ with the area covered by the prohibition area under the BTFG Byelaw 2023 (93%) and the BSB Nest Units defined under the Spatial Principles using best available evidence**



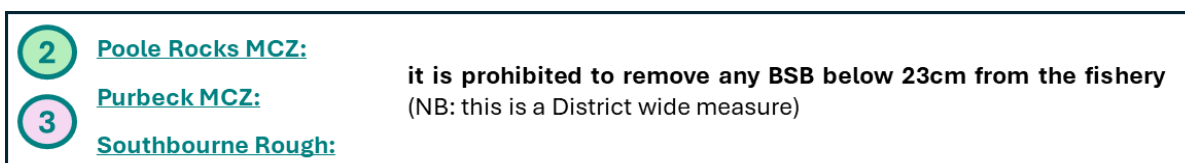
**Figure 12: Poole Rocks MCZ with the area covered by the prohibition area under the BTFG Byelaw 2023 (100%) and the BSB Nest Units defined under the Spatial Principles using best available evidence**



**Figure 13: Southbourne Rough MCZ with the area covered by the prohibition area under the BTFG Byelaw 2023 (100%) and the BSB Nest Units defined under the Spatial Principles using best available evidence**

### Minimum Conservation Reference Size Byelaw

Under the Southern IFCA MCRS Byelaw with the prescribed MCRS of 23cm, applied across the entirety of the supply chain and to both commercial and recreational fishers for all fishing gear types, the following protections are afforded to BSB at a District wide level, extending protections beyond the boundary of the three Dorset MCZs, supporting the furthering of the CO Focus Areas as show in **Figure 14**.



**Figure 14: CO Focus Areas (2 & 3) supported by management interventions provided by the Minimum Conservation Reference Size Byelaw**

### External Measures – Lulworth Ranges

The spatial closures created by the Lulworth Ranges which, based on best available data, is known to be closed to all activity in the Inner Ranges area for between 32-33% of the available time between 1st April and 31st July each year, overlaps with 57% of the BSB nest areas

within the Purbeck Coast MCZ (

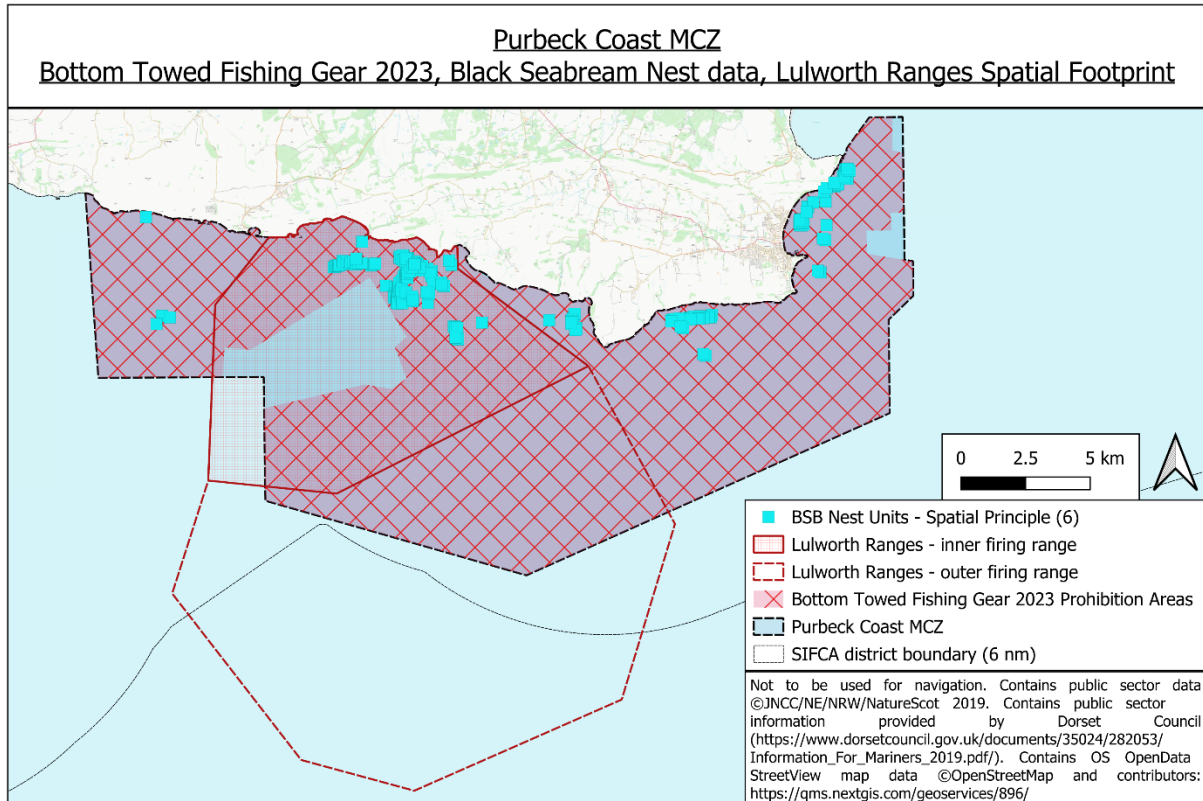


Figure 15). This provides additional protection for BSB populations from all fishing gear types during the breeding season for approx. a third of the total site area over approx. 1/3 of the total breeding season. The Outer Ranges will also be closed periodically, whilst no information is available to quantify this, the closure of the Outer Ranges would provide additional protections to BSB over (in combination with the Inner Ranges) 53.8% of the site. Additionally, the Lulworth ranges continue to operate outside of the breeding season, providing extended protections to BSB outside of the breeding season. The spatial protections provided by the Lulworth Ranges supporting the furthering of the CO Focus Areas as shown in

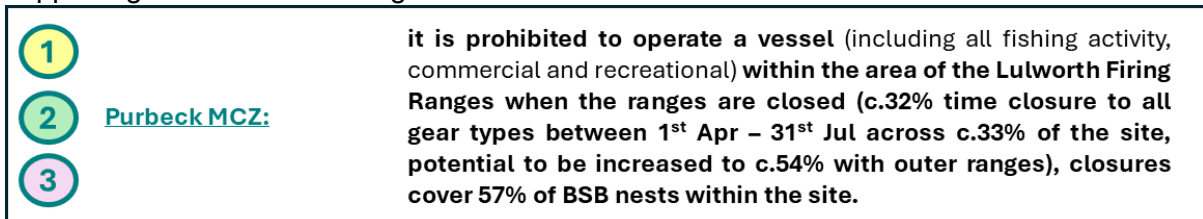
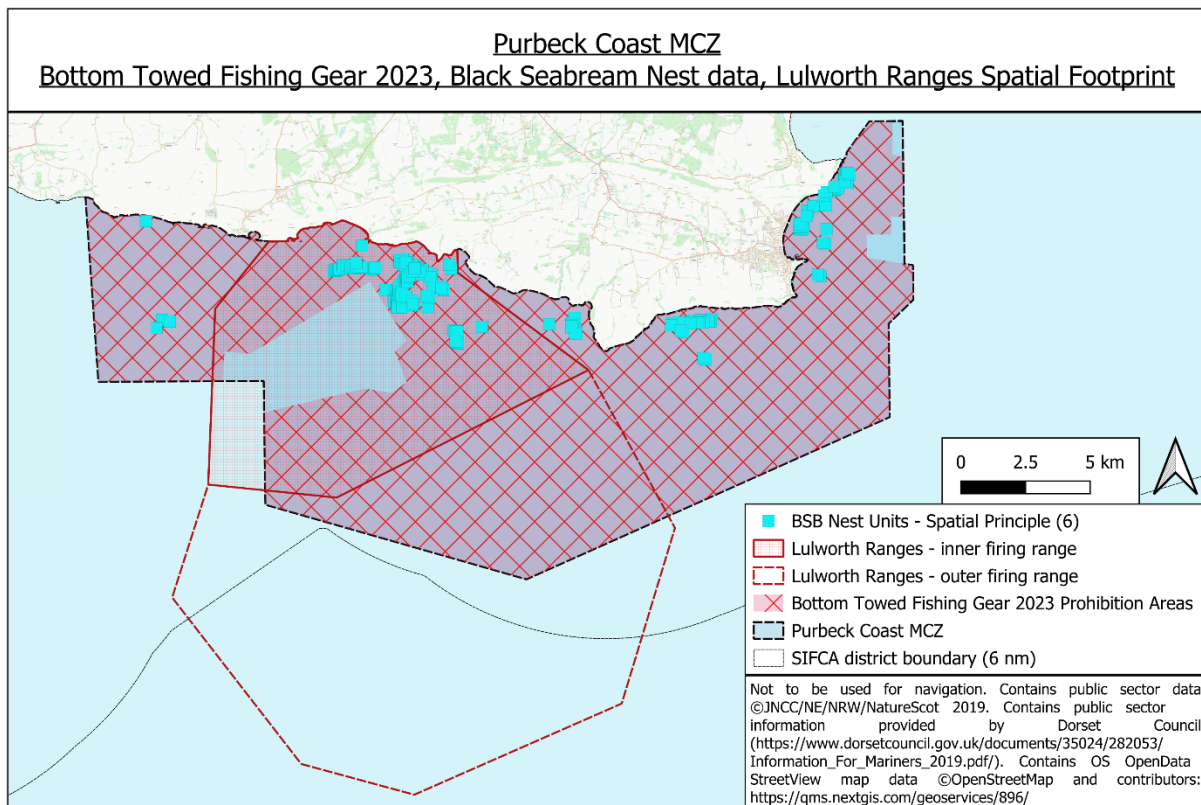
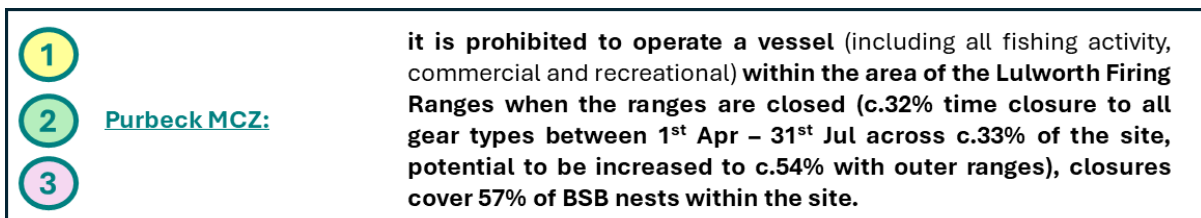


Figure 16.



**Figure 15: Purbeck Coast MCZ overlaid with the prohibition area under the BTFG Byelaw 2023 and the spatial area covered by the Lulworth Ranges, showing the Inner Ranges (solid orange) and the Outer Ranges (orange line) overlapped with BSB nest data from best available evidence**



**Figure 16: CO Focus Areas (1-3) supported by external spatial management afforded by the Lulworth Ranges**

A summary of the assessment of the furthering of the CO Focus Areas achieved by the combination of management measures in place combined with an assessment of the level of risk posed by each relevant gear type is given in **Figure 17**. The full Part B Assessment tables are provided in **Annex 3**.

**In relation to the key focus areas identified from the COs, the spawning habitat is protected from high risk fishing activity during breeding allowing for that habitat to be found in sufficient quality and quantity to avoid any likely significant effect. Additional measures and identification of risk levels for other gear types result in no likely significant impact from other gear types.**

Conservation Objective	Conservation Objectives: Focus Areas		MaCAA 154(1) '...must seek to ensure that the <b>conservation objectives...are furthered...</b> '		MaCAA 154 satisfied?
			<b>HIGH RISK activity = BTFG</b>	Additional Protections – <b>MED</b> & <b>LOW</b> RISK = Pot, Net, Line	
1 spawning habitat used by BSB in the MCZ be of sufficient quality & quantity to enable BSB to survive, aggregate, nest, lay, fertilise or guard eggs during breeding.	spawning habitat used by BSB in the MCZ be of sufficient quality & quantity to enable BSB to survive, aggregate, nest, lay, fertilise or guard eggs during breeding.	Poole Rocks MCZ Purbeck MCZ Southbourne Rough MCZ	BTFG Byelaw 2023 = <b>100% protection</b>		✓
			BTFG Byelaw 2023 = <b>93% protection</b> supported by NE through 2020 advice	57% of nest areas protected for all gear types across 1/3 of site during 1/3 of breeding season	✓ ✓
			BTFG Byelaw 2023 = <b>100% protection</b>		✓
2 the population of BSB occurring in the MCZ be free of disturbance of a kind likely significantly to affect the survival of its members.	the population of BSB occurring in the MCZ be free of disturbance of a kind likely significantly to affect the survival of its members.	Poole Rocks MCZ Purbeck MCZ Southbourne Rough MCZ	BTFG Byelaw 2023 = <b>100% protection</b>	MCRS Byelaw = 23cm	✓ ✓
			BTFG Byelaw 2023 = <b>93% protection</b> supported by NE through 2020 advice	MCRS Byelaw = 23cm 57% of nest areas protected for all gear types across 1/3 of site during 1/3 of breeding season	✓ ✓
			BTFG Byelaw 2023 = <b>100% protection</b>	MCRS Byelaw = 23cm	✓ ✓
3 the population of BSB occurring in the MCZ be free of disturbance of a kind likely significantly to affect their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding.	the population of BSB occurring in the MCZ be free of disturbance of a kind likely significantly to affect their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding.	Poole Rocks MCZ Purbeck MCZ Southbourne Rough MCZ	BTFG Byelaw 2023 = <b>100% protection</b>	MCRS Byelaw = 23cm	✓ ✓
			BTFG Byelaw 2023 = <b>93% protection</b> supported by NE through 2020 advice	MCRS Byelaw = 23cm 57% of nest areas protected for all gear types across 1/3 of site during 1/3 of breeding season	✓ ✓
			BTFG Byelaw 2023 = <b>100% protection</b>	MCRS Byelaw = 23cm	✓ ✓

Figure 17: Summary of the outputs of the Part B Assessment in considering the furthering of Conservation Objectives and associated CO Focus Areas for BSB across the three Dorset MCZs against the management in place and the risk level posed by relevant fishing gear types

## Section E: Part B Assessment Outcomes

Based on the information presented in this document, and the consideration of the potential pressures identified for relevant gear types, in conjunction with designated feature location & extent, policy underpinning the designation of BSB, current & historic levels of fishing activity, the potential for impact to BSB COs from different gear types, evidence provided in peer-reviewed literature, previous NE Advice and Conservation Advice for each site it is concluded that appropriate mitigative measures are already in place via a combination of spatial and technical statutory mechanisms, which are collectively furthering the Conservation Objectives relevant to BSB across three Dorset MCZs.

This is primarily being achieved via the elimination of BTFG activity across the entirety of Poole Rocks MCZ (whole site) and Southbourne Rough MCZ (whole site) and via a BTFG spatial closure across 93%<sup>8</sup> of the Purbeck MCZ, thus removing the highest risk fishing activity almost in its entirety across the three Dorset MCZs. Additionally, the furthering of the COs is being achieved via enforcement of a MCRS for BSB at a District wide level, applicable to commercial and recreational users, which is also applicable to the wider supply chain. Furthermore, spatial restrictions via an exclusion zone in the Purbeck MCZ, which equates to quantifiable closures for c.32% of the time (during the relevant season), across c.33% of the MCZ (which can be extended to c.54%), as enforced by the Ministry of Defence (MOD), are further enhancing protections to BSB in the Purbeck MCZ across the entirety of gear types (commercial and recreational) via closures applicable to all users.

Collectively, the Southern IFCA statutory measures (as well as those enforced by the MOD) are already providing protections to BSB beyond the three MCZ's collective footprint, at a temporal scale beyond that of the breeding season. As such, these statutory measures are providing protections to BSB nesting sites and populations at a level which exceeds the scope of the Conservation Objectives. In combination, these measures are furthering the Conservation Objectives for BSB across the Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ.

## Section F: In-Combination Assessment

As part of the assessment process, Southern IFCA is required to consider the in-combination effect of draft measures with other fishing activities and also other non-fishing plans/projects in relevant areas.

For fishing activities, the appropriate conservation assessments have been completed for the three Dorset MCZs for any activities identified as having a potential impact on the furthering of the Conservation Objectives. These include:

- Bottom Towed Fishing Gear (for all other designated features in the three MCZs)
- Shore gathering activities (for other designated features in Purbeck Coast MCZ)

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<sup>8</sup> The remainder of the Purbeck Coast MCZ is subject to feature data which has been deemed unreliable in terms of location and/or extent by Natural England and is therefore not suitable as a basis for making management determinations. The feature data does not relate directly to BSB and it has been confirmed by NE through the Part A Assessment process for the BTFG Review Phase I that the area of the MCZ which remains open to BSB poses no risk to BSB as a designated feature.

- Pots/Creels (for other designated features in Poole Rocks & Purbeck Coast MCZs)

These assessments concluded, with appropriate management in place, that there will be no impact to the furthering of Conservation Objectives. **Therefore, in relation to fishing activity there is no in-combination effect.**

Considering non-fishing plans/projects, the Southern IFCA is a consultee in the marine licencing process administered by the MMO. Southern IFCA reviews relevant applications for works taking place in the marine environment and through this process identifies whether there is likely to be an overlap with fishing activity. From the current pending marine licence applications, there are no identified plans/projects which overlap with any of the three Dorset MCZs, any marine licences which have been issued would be subject to consideration of an MCZ Assessment in relation to the works with a required conclusion of no impact to furthering the Conservation Objectives or appropriate mitigative measures put in place, therefore for any licenced works any impact would be mitigated resulting in no in-combination effect. **In relation to non-fishing activity there is no in-combination effect.**

## Section G: Integrity Test

**On the basis of the information provided in the Conservation Assessment Package and the management in place in the form of the Bottom Towed Fishing Gear Byelaw 2023, the Minimum Conservation Reference Size Byelaw and external spatial management through the Lulworth Ranges, it is concluded that suitable and appropriate mitigation is in place to ensure that the Conservation Objectives of Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ can be furthered for Black Seabream.**

## Section H: Secondary Policy Objective

### Scope

In addition to satisfying the primary policy objective and therefore the MaCAA 154 requirements, the Authority committed to explore additional management solutions in the BSB fishery, identifying the following drivers and headline objectives:

### **Drivers**

- (1) To improve understandings of BSB behaviours, fisheries and ecosystem management, recognising that these are currently data poor.
- (2) To be proportionate in the application of precaution, complementing existing statutory measures for lower impact fisheries (adaptive management approach).
- (3) To be precautionary, as despite evidence suggesting that current effort is not having an impact, this remains data poor. Additionally, potential future impact also remains unknown.

## Headline Objectives

- (1) To ensure current and future sustainability of BSB populations for the benefit of the marine environment and all sectors.
- (2) To improve understandings via data collection.
- (3) to monitor and review measures (adaptive management).
- (4) include users in policy development and ongoing management interventions.

## Gear Risk Considerations – Lower Risk Gear Types

The outcomes of the Gear Risk Assessment (detailed in **Section B4.0 of this document**), identified the following gear types as either presenting a **low** or **medium** risk to BSB within the three Dorset MCZs:

- Nets – Demersal – Fixed Nets (commercial)
- Lines – Pelagic – Rod & Line (commercial & recreational)

### *Recreational Rod & Line Activity*

Further information was sought from NE on the consideration of recreational rod & line activity (RA) under the Secondary Policy Objective. RA is already subject to active management across the three Dorset MCZs (and at a District wide level) through the application of the Southern IFCA MCRS Byelaw and via the application of MOD exclusion zones in the largest of the three Dorset MCZs (as detailed in Section D). These mechanisms, as per the outcome of the Part B Assessment, are and will continue to further the COs of the MCZs and therefore have direct relevant to Southern IFCA's duties under Section 154 of MaCAA and the achievement of the Primary Policy Objective.

It is the Authority's view that any potential disturbance resulting from RA which is likely significantly to affect a) the survival of BSB, and b) the ability of BSB to aggregate, nest, or lay, fertilise or guard eggs during breeding, is mitigated via:

the ongoing application of the Southern IFCA MCRS, this is a statutory measure that has been in place since 2001, with Southern IFCA compliance metrics demonstrating embedded community compliance with this established measure

the active enforcement by many of the charter operators working the MCZs of their own bag limits, and across the RA sector, charter operators and individuals working to an increased MCRS, recognising the importance of the sustainability of the BSB fishery via self-governance mechanisms

recent BAE (2025) provided through the Angling for Sustainability Fisheries Industry Science Partnerships Project (AfS FISP), providing an early indication that following tagging and release (a more invasive and intensive activity than catch & release), BSB can return to nesting site areas which some fish then appearing to spend time in a small spatial area potentially indicative of returning to nesting behaviour<sup>9</sup>

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<sup>9</sup>This data is currently unpublished and is in the early stages of analysis, therefore a full determination of this behaviour can only be made following the conclusion of all required analysis. Reporting of early indications as detailed in the text is with the permission of the University of Plymouth.

additional spatial measures enforced by the MOD which further mitigate the potential impact of RA in 33% of the largest MCZ (Purbeck Coast), during 32% of the breeding season, with the potential for increased spatial coverage of closures up to 54%

The Authority deem that these measures in combination, which are directly applicable to RAs are furthering the COs without the requirement for further intervention under the Primary Policy Objective.

### **Legislative Underpinning**

The consideration of delivering the secondary policy objective is made under Section 153 (2) of the MaCAA, namely when managing the exploitation of inshore fisheries, Southern IFCA must:

- a. seek to ensure that the exploitation of sea fisheries resources is carried out in a sustainable way,
- b. seek to balance the social and economic benefits of exploiting the sea fisheries resources of the district with the need to protect the marine environment from, or promote its recovery from, the effects of such exploitation,
- c. take any other steps which in the authority’s opinion are necessary or expedient for the purpose of making a contribution to the achievement of sustainable development, and
- d. seek to balance the different needs of persons engaged in the exploitation of sea fisheries resources in the district

### **Co-Developed Principles**

As underpinned by a set of Drivers and Headline Objectives, which provided the rationale for the exploration of additional management solutions, the following Co-Developed (CoD) principles; in addition to their application, have been finalised for consideration by the TAC in Autumn 2025.

The CoD principles have been informed via the co-development process and the best available evidence base as detailed in the **Black Seabream Literature Review** and the **Black Seabream Site Specific Evidence Packages**.

*Table 5: Co-Developed Principles for BSB in three Dorset MCZs*

<b>Application of Co-Developed Principles:</b>	
Voluntary, applying within the 3 Dorset MCZs, and in force during the period 1 <sup>st</sup> April to 31 <sup>st</sup> July	
<b>Co-Developed Principles:</b>	
Minimum Conservation Reference Size	28cm
Maximum Conservation Reference Size	38cm
Recreational Bag Limit	6 fish per person per day
Guidance	Good practice fishing & handling
Data Collection	Year-round, all sectors

## Seasonality

With respect to the application of the CoD Principles for the period 1<sup>st</sup> April to 31<sup>st</sup> July, further information was sought from NE as to the omission of March from the defined breeding season. In accordance with the best available evidence, the recognised breeding season for BSB is 1<sup>st</sup> April to 31<sup>st</sup> July. The details of the BAE used to inform this position are provided in the **Black Seabream Site Specific Evidence Packages** relevant to each MCZ and in Section 1.2.1 of the **Black Seabream Literature Review**, this information being used to inform an Authority Members' Working Group in February 2024 where the breeding season was discussed and agreed to be taken forward by Members as 1<sup>st</sup> April to 31<sup>st</sup> July.

The literature on seasonality used in the Literature Review includes six references to seasonality either along the south coast of England (3 studies), specific to the Dorset MCZs (2 studies) or specific to the Kingmere MCZ (1 study). The study for the Kingmere MCZ represents the most up to date published literature on BSB seasonality, reflecting that 92% of tagged BSB were detected at known nesting areas between April to June in 2022 and almost exclusively within this period in 2023 (Davies *et al.*, 2024). Studies specific to the Dorset MCZs reference nest presence between May and June (Collins and Mallinson, 2012) and nesting within June, extending into July (Doggett, 2018). Studies for the south coast of England more widely reference the period April to July (Wilson, 1958; Lythgoe and Lythgoe, 1971; Pawson, 1995; Collins and Mallinson, 2012). The start of the breeding season in April is also consistent with the breeding season applied in the Sussex IFCA District to the Kingmere MCZ, with 'Bream Season Management' defined for the period 1<sup>st</sup> April to 30<sup>th</sup> June. Furthermore, the Purbeck Coast, Poole Rocks and Southbourne Rough MCZ Factsheets developed by Defra list the breeding season as April to July. The seasonality information provided by NE as part of the Conservation Advice is included in supporting documents to this Conservation Assessment Package, however it is noted that the advice also states that any assessment of potential impacts on the features must be based on up-to-date data and take account of population trends in evidence from any other available information as well as the Conservation Advice.

The Authority consider the BAE referenced in the Literature Review to provide the most accurate temporal determination of the breeding season, and as such it is determined that there is no risk to BSB populations associated with the breeding season omitting March.

## Data Collection

NE sought further information on how data collected under the Data Collection CoD Principle will be used for the purposes of adaptive management. BSB populations and associated fisheries are considered data poor, the data collection programme providing data at the spatial scale of the three MCZs, year-round, supporting wider external research on BSB, and providing an evidence base to help inform ongoing management of relevant fisheries. Details of the data collection programme and its application can be found in Sections 2.3.2 and 2.4 of the **Process Document 3: Management Tools, Application & Review** policy document which forms part of the BSB Management Package.

The CoD principles seek to complement the existing management protections afforded to BSB in the three Dorset MCZs, through an adaptive management approach which responds to the best available evidence.

Whilst the Secondary Policy Objective remains legislatively separate to the Primary Policy Objective, the application of management solutions relevant to the Secondary Policy Objective

will contribute to the ongoing furthering of COs in a way which considers the wider complexities of the BSB fisheries in Dorset, allowing understandings of the fisheries to advance in collaboration with stakeholders, which will facilitate achievement of shared endeavours which are relevant to Southern IFCA, Natural England and the wider community.

Affording BSB with proportionate and appropriate protections in an adaptive manner allows sustainability of these fisheries in Dorset. Southern IFCA's role as a regulator is not to inhibit fishing activity disproportionately and therefore must consider risk and proportion in its decision-making processes.

For full details of the BSB Management Intentions please see the policy documents which form part of the BSB Management Package;

- [Process Document 1 – Delivery Policy Objectives](#)
- [Process Document 2 – Decision Making & Road Map](#)
- [Process Document 3 – Management Tools, Application & Review](#)

## Section I: Conclusion

In satisfying the primary policy objective, it is concluded that suitable and appropriate mitigation is in place to ensure that the Conservation Objectives of Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ can be furthered for Black Seabream. In delivering under the secondary policy objective in addition to this, Southern IFCA and the Dorset Community are affording BSB protections which go beyond the furthering of the Conservation Objectives by providing complementary measures to those already in place and by supporting advancing the understandings of the health of the BSB fishery over time with community by-in.

Through pragmatic application of Southern IFCA's legal functions, shared objectives (namely the overall sustainability of BSB) can be achieved via parallel delivery of 154 and 153 duties, which will facilitate co-management with a community who are committed to the ongoing protection of the BSB. The dual approach presented by Southern IFCA allows the management focus for lower risk fishing activities to be iterative and adaptive, as supported by improved understandings, and thus providing a more holistic approach to conservation and fisheries management which, in combination will achieve a furthering of conservation objectives, whilst remaining true to the wider functions of the IFCA. This provides a platform upon which Southern IFCA can continue to work collegiately with NE and the Dorset community to ensure that shared objectives are achieved in the long term at a community level for the benefit of both conservation and fisheries.

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## Annex 2: Gear Risk Assessment

The following table provides the rationale for the assigning of a risk level to a particular gear type under the gear risk assessment carried out for BSB in three Dorset MCZs.

Gear Type	Sector	Pressure	Risk	Rationale
BTFG	Commercial	Abrasion	HIGH	Rock habitats at risk where interspersed throughout subtidal mixed sediments, risking overlap where mixed sediments fringe rock habitat. Footprint can be 0.2-2.0m wide and 30cm deep from otter boards or trawl doors. Beam width can be around 4m on each side. Study on trawling over habitat where veneer of sediment covered gravel and boulders resulted in sediment veneer being removed and underlying structure disrupted (supported by second study where single pass of an otter trawl had same effect) - sediment veneer over rock is preferred nesting habitat for BSB.
		Removal Non-Target	HIGH	Dependent on location unable to fully determine level of obtaining BSB as a bycatch - aggregation of species increases risk. Potential for BSB to return to nest if released in good condition but damage from this gear type is not known and more likely/more likely to be severe than from other gear types. More risk of indiscriminate fishing due to footprint of gear type and wider range of species targeted.
		Removal Target	HIGH	Data from landings of BSB by trawls in 30E7 and 30E8 indicate mixed pattern over time but levels generally low, max. average 0.2 tonne in 2022 in 30E8 (incorporates all ICES area, not able to be District or MCZ specific with available data. However, this data is considering BTFG Byelaw 2016 closures, if no BTFG closures in place levels of activity within MCZs and corresponding landings not known.
		Smothering & Siltation	HIGH	High potential for sediment movements from gear passage which may smother neighbouring habitats. Wider passage of gear interacting with the seabed increases spatial extent and likelihood and severity of effect occurring.
Pot Fishing	Commercial	Abrasion	LOW	Levels of activity are generally low in the west and centre of Purbeck Coast MCZ, levels in the eastern part of the site have declined since 2005 with levels between 2020-2025 having a maximum of 5 sightings per year. For Poole Rocks and Southbourne Rough levels have been consistently low over 2005-2025.

				The activity is not identified as a risk activity by NE for BSB. Literature identifies potential for movement and interaction with seabed but at small scales, some studies show less than 2m <sup>2</sup> interaction area, organisms rather than habitats noted as being affected (long-lived sessile branching organisms), total time moving pots during hauling estimated to be around 20 seconds.
Nets – Demersal – Drift Nets	Commercial	Abrasion	LOW	Activity not observed in Poole Rocks or Southbourne Rough, last sighting in Purbeck Coast in 2005. Activity in Purbeck Coast is limited by tidal action and based on best available evidence is not anticipated to occur.
		Removal Non-Target	LOW	
		Removal Target	LOW	
Nets – Demersal – Fixed Nets	Commercial	Abrasion	LOW	Gill netting, trammel netting and entangling netting all have potential to occur in the site. Potential for lead line and anchors to sweep seabed causing abrasion, however indication from literature that swept area is small (Danish study up to 2m, commonly 10cm), documented impacts being for branching species. Potential for significant impact to nesting sites is very low. Low levels of documented activity within all three sites, no sightings of this type of fishing in Purbeck Coast MCZ since 2011, occurrences in Poole Rocks MCZ are limited to 1 sighting in 2025 and the same for Southbourne Rough.
		Removal Non-Target	LOW	Potential for low levels of activity in more inshore areas due to tidal influence in outer parts of Purbeck Coast MCZ, however generally levels remain very low. In Southbourne Rough MCZ trammel nets target sole, bycatch noted as plaice, turbot and brill but not documented as BSB. Entangling nets noted to be used to target ray and skate species, large mesh sizes required therefore risk of BSB as bycatch is reduced. Low levels of documented activity within all three sites (see row above).
		Removal Target	LOW	Removal of BSB as target species occurs, recorded catches of BSB in nets from landings data in 30E7 (Purbeck Coast) and 30E8 (Poole Rocks and Southbourne Rough) show general consistency in last 5 years (2020-2024), some increase in landings during breeding season in 30E7 but larger catches are outside breeding season in 30E8. Use of these gear types through documented activity (<12m vessels) is low in all three sites, average landings per year for 30E7 vary from 0.13 to 0.016 tonnes (2020-2024), and for 30E8 from 0.034 to 0.013 tonnes (2020-2024). Monthly averages (2020-2024) for 30E7 0.003-0.26 tonnes, peak in February, less than 0.05 tonnes (April to November), for 30E8 0.0067-0.08 tonnes, peak in April (less than 0.05 tonnes June to March Landings based on MMO data for BSB for Dorset Ports within District (highest resolution available and therefore likely overestimate of fishing within MCZs specifically) shows low levels of landings in 2024 (average 0.199 tonne) and for last 3 years (average all less than 0.1 tonne) and generally for last 9 nine years

				(average all less than 0.5 tonne), broken down by month for last three years higher levels of landings have occurred primarily outside the period April to July. See 'Abrasion' row for this gear type for sightings data indicating low levels of activity in all three sites.
Nets – Pelagic – Drift Nets	Commercial	Removal Non-Target	LOW	Activity not observed in Poole Rocks or Southbourne Rough, last sighting in Purbeck Coast in 2005. Activity in Purbeck Coast is limited by tidal action and based on best available evidence is not anticipated to occur.
		Removal Target	LOW	
Lines – Demersal – Longlines	Commercial	Abrasion	LOW	Demersal long-lining is not known to occur within Poole Rocks or Southbourne Rough. Historic potential for 1-2 vessels to use the activity in Purbeck Coast but no observed sightings by Southern IFCA or information that the activity is occurring, therefore it is not anticipate to occur.
		Removal Non-Target	LOW	
		Removal Target	LOW	
Lines – Pelagic – Longlines	Commercial	Removal Non-Target	LOW	Pelagic long-lining is not known to occur within Poole Rocks or Southbourne Rough. Historic potential for 1-2 vessels to use the activity in Purbeck Coast but no observed sightings by Southern IFCA or information that the activity is occurring, therefore it is not anticipated to occur.
		Removal Target	LOW	
Lines – Pelagic – Rod & Line	Commercial	Removal Non-Target (including jigging/trolling)	LOW	Commercial rod & line is a very targeted activity, whilst BSB may be caught as bycatch, different techniques and areas will be fished if other species are being targeted. Focused activity on MCZs is most commonly when BSB are a target species. Indication from recent research that BSB are returning to nests post-tagging, indicating strong likelihood that BSB returned from rod & line would also return to nests.  Sightings data does not distinguish between commercial and recreational rod & line activity, however for Purbeck Coast MCZ across the gear type of rod & line collectively sightings have decreased from 2005, the maximum in the last five years being 11 (2021). Peaks in activity were also seen in the same year for Poole Rocks MCZ (20) and Southbourne Rough MCZ (less than 10) with levels lower than this in subsequent years.
		Removal Target	LOW	BSB are a target species for commercial rod & line, however landings data into Dorset Ports indicates fluctuating and generally low levels. Catch levels on average remain low between 0.7 tonne and 0.06 tonne (2016-2024). No consistent pattern in MMO landings data into Dorset ports that suggests activity is focused on April to July breeding season, for most recent three years (2022-2024), highest landings per month limited to an average of 0.2 tonne maximum which occurred in November. Landings between April to July (2022-2024) varied from an average of 0.1 to 0.01 tonne.

				<p>For wider areas 30E8 and 30E7, vessels &lt;12m, the average weight landed from 2020-2024 ranges from 0.026 to 0.048 tonnes per year, max weight 0.12-0.38 tonnes in 2024 (30E7), the average weight from 2020-2024 ranges from 0.018 to 0.027 tonnes per year, max weight 0.11-0.24 tonnes in 2024 (30E8). 30E7 highest target month March, 30E8 January.</p> <p>See row above for sightings data.</p>
	Recreational	Removal Non-Target (including jigging/trolling)	MED	<p>Charter or private RSA rod &amp; line is a very targeted activity, whilst BSB may be caught as bycatch, different techniques and areas will be fished if other species are being targeted. Focused activity on MCZs is most commonly when BSB are a target species. Indication from recent research that BSB are returning to nests post-tagging, indicating strong likelihood that BSB returned from rod &amp; line would also return to nests.</p>
		Removal Target	MED	<p>BSB are a target species for charter and private RSA rod &amp; line activity. Charter vessels already employ larger MCRS and bag limits as voluntary measures on majority of vessels, RSA often employ larger MCRS (24cm) recommended by AT. Competitions are most commonly catch and release. Indication from recent research that BSB are returning to nests post-tagging, indicating strong likelihood that BSB returned from rod &amp; line would also return to nests.</p> <p>Information collected through the Southern IFCA data collection program for May 2021 and May 2022 showed for Purbeck Coast an average CPUE of 1.47 BSB per rod per hour corresponding to a 21.5% retention, for Poole Rocks MCZ the average CPUE was 0.72 BSB per rod per hour with a retention of 15.4% and for Southbourne Rough an average CPUE of 0.86 BSB per rod per hour with a retention of 21.5%.</p>

*(\*) Note that for landings data from 30E7, 30E8 and at the level of 'Dorset Ports' does not provide for an analysis of the level of fishing activity taking place specifically within an MCZ, therefore catch levels will represent an overestimate of any catches occurring within an MCZ.*

## Annex 3: Part B Assessment Table

Advice on Operations: Demersal Trawl					
Potential Pressure	Relevant MCZ	Rationale	Relevant Attributes	Gear Risk Level	Mitigation Measures
Abrasion/disturbance on the surface of the seabed	Southbourne Rough	The gear type is known to cause abrasion and disturbance to the seabed. Male BSB clear a patch of sediment to use as a nest site, the gear type has the potential to move cleared sediment areas, destroying the nest and to smother and destroy eggs.	Nest abundance Population: age/size frequency Population: population size Population: recruitment and reproductive capability Presence and spatial distribution of the species Supporting habitat: extent and distribution Supporting processes: water quality - turbidity	<b>HIGH</b>	All forms of BTFG prohibited across the whole site at Southbourne Rough MCZ at all times of the year – 100% protection.  Extended protection provided by prohibition applying year round and therefore extended protections outside of identified breeding season further supporting the COs.
Removal of non-target species		Impacts on the feature may occur through the removal of the feature as a non-target species.			
Removal of target species		Impacts on the feature may occur through the removal of the feature as a target species.			
Smothering and siltation rate changes (light)		The gear type has the potential to move and increase sediment around nest areas, destroying the nest and smothering and destroying the eggs.			
Advice on Operations: Anchored Nets/Lines					
Removal of non-target species	<ul style="list-style-type: none"> <li>• Purbeck Coast</li> <li>• Poole Rocks</li> </ul>	BSB may be caught by the activity as a non-target species by either recreational or commercial operators.	Population: age/size frequency Population: population size Population: recruitment and reproductive capability	<b>LOW</b>	MCRS of 23cm applied across the supply chain.

Removal of target species	<ul style="list-style-type: none"> <li>• Southbourne Rough</li> </ul>	BSB may be caught by the activity as a target species by either recreational or commercial operators.	Presence and spatial distribution of the species		Protection within 1/3 of the area of the Purbeck Coast MCZ for 1/3 of the breeding season covering 57% of BSB nest areas.
<b>Advice on Operations: Pelagic Fishing (or fishing activities that do not interact with the sea bed)</b>					
Removal of non-target species	<ul style="list-style-type: none"> <li>• Purbeck Coast</li> <li>• Poole Rocks Southbourne Rough</li> </ul>	BSB may be caught by the activity as a non-target species by either recreational or commercial operators.	Population: age/size frequency Population: population size Population: recruitment and reproductive capability	Pelagic Fishing: Draft Nets, Longlines  <b>LOW</b>  Pelagic rod & line  <b>MED</b>	MCRS of 23cm applied across the supply chain.
Removal of non-target species		BSB may be caught by the activity as a non-target species by either recreational or commercial operators.	Presence and spatial distribution of the species		Protection within 1/3 of the area of the Purbeck Coast MCZ for 1/3 of the breeding season covering 57% of BSB nest areas.

## Annex 4: Natural England Letter, 10<sup>th</sup> Nov 2025

A copy of the letter received from Natural England dated 10<sup>th</sup> November 2025 seeking further clarity on specific points related to the Black Seabream Conservation Assessment Package, submitted for Formal Advice on 13<sup>th</sup> October 2025.

Date: 10 November 2025  
Our ref: 530485  
Your ref: Black Seabream Conservation Assessment Package



Sarah Birchenough  
Southern Inshore Fisheries & Conservation Authority  
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### BY EMAIL ONLY

Dear Sarah

#### **Southern IFCA Black Seabream Conservation Assessment Package**

Thank you for your consultation on the above which was received on 13 October 2025. The following constitutes Natural England's formal statutory response.

Purbeck Coast, Poole Rocks and Southbourne Rough MCZs are designated to protect black seabream (*Spondyllosoma cantharus*) during the breeding stage of their lifecycle (encompassing aggregating, nesting, laying, fertilising and guarding eggs) when they are particularly vulnerable to anthropogenic impacts. While the Purbeck Coast and Southbourne Rough sites were designated through the second tranche of the MCZ process in 2019, Poole Rocks was designated through the first tranche in November 2013 – with black seabream subsequently designated as an additional feature in 2019.

SIFCA has duties under section 154 of the Marine and Coastal Access Act 2009 (MaCAA) to ensure that the conservation objectives of any MCZ in the district are furthered. Section 125 of the Act also requires that public authorities (including IFCAs) exercise their functions in a manner which best furthers (or, if not possible, least hinders) the conservation objectives for MCZs.

The conservation objectives for the three Dorset MCZs are that, in relation to black seabream:

- (1) the habitat used by individuals of that species for the purposes of spawning (spawning habitat);
  - (a) are maintained in favourable condition if they are already in favourable condition;  
or
  - (b) be brought into favourable condition if they are not already in favourable condition.
- (2) the population (whether temporary or otherwise) of that species occurring in the zone be free of disturbance likely to significantly affect the survival of its members or their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding.

In order to demonstrate that their duties under MaCAA are being fulfilled, SIFCA has undertaken an assessment of fishing activities within the three Dorset MCZs with respect to the black seabream feature. The assessment comprises the following documents that have been provided to Natural England:

- Black Seabream Site Activity Screening Document
- Black Seabream MCZ Assessments – Part A
- Black Seabream MCZ Assessment Package
- Black Seabream Site-Specific Evidence Packages
- Black Seabream Literature Review

As requested, Natural England has reviewed these documents with respect to their content and conclusions. Please find our advice detailed below.

### **1. Black Seabream Site Activity Screening Document**

The Site Activity Screening Document identifies the following activities that occur, or have the potential to occur, within each MCZ and are therefore taken forward for Part-A assessment:

- Purbeck Coast MCZ: Anchored nets/lines; pelagic fishing; traps; diving; demersal trawl
- Poole Rocks MCZ: Anchored nets/lines; pelagic fishing; traps
- Southbourne Rough MCZ: Anchored nets/lines; pelagic fishing; traps; diving

Natural England agrees with the approach taken and conclusions of this screening exercise. We note that bottom towed fishing gear has been screened out for the Poole Rocks and Southbourne Rough MCZs due to this activity being prohibited across the entirety of these sites via SIFCA's Bottom Towed Fishing Gear Byelaw 2023. This activity is screened in for Purbeck Coast MCZ as the Byelaw covers the majority (92%) but not all of the site.

### **2. Black Seabream MCZ Assessments – Part A**

The Part A assessments apply Natural England's published Advice on Operation to each relevant gear type to activity to determine relevant pressures and assess the potential for likely significant impact. We have reviewed these assessments and agree with the approach taken and conclusions.

### **3. Black Seabream MCZ Assessment Package**

Natural England has provided comments on each relevant section of the Assessment Package below.

#### **3.1 Defining principles:**

To facilitate the progression of management considerations a series of legislative, evidence and spatial principles were developed as part of a series of Member Working Groups in which Natural England participated. During this process Natural England questioned the definition of the breeding season as 1<sup>st</sup> April to 31<sup>st</sup> July as this is inconsistent with the seasonality tables provided in the relevant Conservation Advice packages – which state 1<sup>st</sup> March to 31<sup>st</sup> July. We note that the Site-Specific Evidence Packages refer to peer-reviewed literature on seasonality which is implied to support an April-July season. However, we recommend that

further justification is provided in the Assessment Package as to why March has been omitted from the defined breeding season; particularly as some of the sources referenced in the Literature Review make reference to black seabream being present on the south coast during this month. It would also be beneficial to outline the implications and relative risk to black seabream of omitting March within the Assessment Package.

During the Member Working Groups, Natural England also highlighted the limitations of using best available evidence to identify nest locations and 'Indicative Habitat Areas', namely that: (i) the data used does not fully capture all the nest sites within the MCZ; (ii) the location of nest sites may move over time to alternative areas of suitable substrate; and (iii) by focusing upon nest sites only, there is a risk that this approach does not adequately protect pre-spawning (i.e. aggregation) behaviour as per the conservation objectives. Our advice on this matter still stands with respect to the defining principles presented in the Assessment Package.

### 3.2 Gear risk assessment:

An assessment of the risk posed by relevant gear types has been undertaken which considers site-specific information in addition to Natural England's published Conservation Advice. The stated purpose of this assessment is to fully explore the level of risk posed by each relevant gear type and how this would contribute to the consideration of appropriate mitigation to meet Southern IFCA's duties under MaCAA (s.154) under a Part B Assessment.

We note that bottom towed fishing gear (BTFG) is categorised as high risk; recreational rod and line angling as medium risk; and pots, nets, lines and commercial rod and line angling as low risk. While Natural England does not disagree that the risks posed by BTFG are likely to be greater than recreational rod and line angling, we have some observations around how these risk categories relate to the Policy Objectives and associated management solutions (see below).

### 3.3 Policy Objectives

The assessment identifies a primary policy objective to manage black seabream as a designated feature of MCZs – thereby fulfilling SIFCAs duties under MaCAA (s.154). The management of bottom towed fishing gear, as a high-risk activity, is considered with respect to this objective.

Additionally, a secondary policy objective is identified to explore additional management solutions for black seabream under the following drivers:

- 1) To improve understandings of BSB behaviours, fisheries and ecosystem management, recognising that these are currently data poor.
- 2) To be proportionate in the application of precaution, complementing existing statutory measures for lower impact fisheries (adaptive management approach).
- 3) To be precautionary, as despite evidence suggesting that current effort is not having an impact, this remains data poor. Additionally, potential future impact also remains unknown.

We note that this secondary policy objective is applied under Section 153(2) of MaCAA rather than Section 154; and applies to 'lower risk' activities including recreational angling. As such, it is our interpretation that any management measures presented under this secondary

objective are deemed to be beneficial to black seabream but not necessary to further the conservation objectives of the three Dorset MCZs.

Given the risk of disturbance to black seabream posed by recreational angling, it is unclear from the Assessment Package document why the management of this activity is being considered under the secondary policy objective. It is Natural England's view that it should be considered under the primary policy objective given the direct relevance of the disturbance pressure to the conservation objectives.

#### 3.4 Management solutions

The assessment identifies three existing measures that provide protection to black seabream in the Dorset MCZs:

- 1) The Southern IFCA Bottom Towed Fishing Gear Byelaw 2023: which prohibits the use of towed gear within the entirety of the Poole Rocks and Southbourne Rough MCZs, and across 93% of the Purbeck Coast MCZ.
- 2) The Southern IFCA Minimum Conservation Reference Size Byelaw: which stipulates a MCRS of 23cm for black seabream within the SIFCA district.
- 3) Ministry of Defence restrictions for the Lulworth Firing Ranges: which prohibit all vessels from operating within the Inner Ranges and Outer Ranges during specified periods. The area of the Inner Ranges and Outer Ranges covers 32.8% and 21% of the Purbeck Coast MCZ respectively.

The contribution of these measures to satisfying the primary policy objective are considered within the Part-B assessment with respect to pre-defined spatial principles.

Natural wrote to SIFCA on 28 February 2025 to clarify our advice on the designation, conservation objectives and protection of the black seabream feature. In this correspondence, we welcomed SIFCA's commitment to prohibit bottom towed fishing gear within the Purbeck Coast, Poole Rocks and Southbourne Rough MCZs, as these activities have the potential to cause disturbance to black seabream and affect the condition of their spawning habitat during the breeding season. However, it was (and remains) our position that current recreational angling activities continued to risk hindering the achievement of the conservation objectives of the sites; and that these objectives would be best furthered through spatial closures to ensure black seabream are not significantly disturbed during the breeding season. Natural England's position on spatial closures is consistent with our advice to the offshore wind and aggregate sectors regarding impacts on black seabream in Kingmere MCZ, in addition to our advice to Sussex IFCA on the management of fishing activities within this site.

We note that the introduction of seasonal spatial closures to recreational angling within the three Dorset MCZs are not proposed. Given that spatial closures were previously explored within the Member Working Groups, it would be helpful to clarify why this approach is no longer deemed appropriate.

It is acknowledged that temporary spatial closures associated the Lulworth Firing Ranges will reduce recreational angling pressure within the Purbeck Coast MCZ. Additionally, the following voluntary co-developed principles (to be applied to each MCZ during the period 1<sup>st</sup> April – 31<sup>st</sup> July) are proposed under the secondary policy objective:

- Minimum Conservation Reference Size: 28cm
- Maximum Conservation Reference Size: 38cm
- Recreational Bag Limit: 6 fish person per day
- Guidance: Good practice fishing & handling
- Data collection: Year-round, all sectors

While Natural England is supportive of these measures, our previous comments regarding seasonality (section 3.1) remain applicable. Furthermore, consistent with our comments under section 3.3, it is unclear why these measures are being proposed under the secondary policy objective and as such are not considered applicable to SIFCA's duties under Section 154 of MaCAA.

### 3.5 Part-B Assessment outcomes

The Part-B assessment concludes that *"...appropriate mitigative measures are in place through spatial restrictions on BTFG and other gear types and an MCRS applied across the supply chain to further the Conservation Objectives for Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ with regard to the feature black seabream"*.

Natural England is currently unable to agree with this conclusion based on the information provided. We note that information pertaining to the risks and potential impact of recreational angling is provided in the Literature Review. However, it is our view that the rationale for why additional management of recreational angling is not required to meet SIFCA'S primary policy objective is underdeveloped.

As noted in sections 3.3. and 3.4 we recommend that further information is provided in the Assessment Package on why the categorisation of recreational angling as medium risk means that management of this activity is not required to fulfil SIFCA's duties under MaCAA (s.154). More specifically, this information should demonstrate why disturbance resulting from recreational angling is not likely to significantly affect the survival of black seabream or their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding – as per the conservation objectives.

Additionally, it would be helpful to expand on how data collected via the co-developed principles will be used for the purposes of adaptive management; for example, whether it will be used to identify increased/emerging risks and trigger a review of the current management approach.

## 4. Black seabream Site Specific Evidence Packages and Literature Review

Natural England welcomes the provision of the Evidence Packages and Literature Review se documents to support the MCZ Assessment Package. We do not have any specific comments relating to these documents but have made several broader recommendations within this letter around how this evidence is used to support the conclusions of the Assessment Package.

## 5. Summary

Natural England welcomes SIFCA's commitment to manage fishing impacts upon black seabream in the Purbeck Coast, Poole Rocks and Southbourne Rough MCZs. In reviewing the MCZ Assessment Package and supporting documents we have identified several areas

where we feel further justification is required to support the conclusions. We would be happy to provide further advice to SIFCA on these aspects if that would be helpful.

Should you have any queries, please contact me using the details provided below.

Yours sincerely



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## Annex 5: Southern IFCA Response to NE Letter, 20<sup>th</sup> Nov 2025

A copy of the response letter provided by Southern IFCA to NE in response to the letter seeking additional clarity on specific points related to the Conservation Assessment Package.

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20<sup>th</sup> November 2025

BY EMAIL ONLY

**Ref: request for further rationale re: Formal Advice on Black Seabream**

Dear Richard,

In response to your email dated the 10<sup>th</sup> of November 2025, where you have asked for further information on several matters, I am pleased to provide the following information. Please note that in the absence of a specific list of questions, the responses have been summarised around the following points:

### Length of Breeding Season: 1<sup>st</sup> April – 31<sup>st</sup> July

1. To provide further justification as to why March has been omitted from the defined breeding season and to outline the implications and relative risk to black seabream as a result of this.

In accordance with the best available evidence, the recognised breeding season for black sea bream (BSB) is 1st April – 31st July. The details of the Best Available Evidence (BAE) used to inform this position are provided in the documents 'Black Seabream Site Specific Evidence Packages' relevant to each MCZ and in Section 1.2.1 of the 'Black Seabream Literature Review', this information being used to inform a Member Working Group in February 2024 where the breeding season was discussed and agreed to be taken forward by Members as 1st April – 31st July.

For ease and in order to expand further on this matter, the literature on seasonality used in the Literature Review includes six references to seasonality either along the south coast of England (3 studies), specific to the Dorset MCZs (2 studies) or specific to the Kingmere MCZ (1 study). The study for the Kingmere MCZ represents the most up to date published literature on BSB seasonality, reflecting that 92% of tagged BSB were detected at known nesting areas between April to June in 2022 and almost exclusively within this period in 2023 (Davies *et al.*, 2024). Studies specific to the Dorset MCZs reference nest presence between May and June (Collins and Mallinson, 2012) and nesting within June, extending into July (Doggett, 2018). Studies for the south coast of England more widely reference the period April to July (Wilson, 1958; Lythgoe and Lythgoe, 1971; Pawson, 1995; Collins and Mallinson, 2012). The start of the breeding season in April is also consistent with the breeding season applied in the Sussex IFCA District to the Kingmere MCZ, with 'Bream Season Management' defined for the period 1<sup>st</sup> April to 30<sup>th</sup> June. Furthermore, the Purbeck Coast, Poole Rocks and Southbourne Rough Factsheets developed by Defra list the breeding season as April to July. The seasonality information provided by Natural England as part of the Conservation Advice is included in supporting documents for the BSB Conservation Assessment Package, however it is noted that the advice also states that any assessment of potential impacts on the features must be based on up-to-date data and take account of population trends evidence from any other available information as well as the Conservation Advice.

With consideration of the information provided in the above paragraphs, the Authority consider the BAE referenced in the Literature Review, to provide the most accurate temporal determination of the breeding season, and as such do not consider there to be any risk associated with the breeding season by omitting March.

It is prudent to reiterate that the fishing activity which poses the highest risk (Bottom Towed Fishing Gear [BTFG]) has already been removed across all three MCZs at a near site level, across the entirety of the calendar year. Therefore, the protections afforded to BSB by the BTFG Byelaw 2023 alone are considered by the Authority to exceed the scope of the Conservation Objectives (COs), when reflecting that the measures are applicable and actively enforced beyond the scope of the recognised breeding season. Further, existing measures in place which are applicable across all gear types across a 12-month temporal scale (MCRS & Lulworth Ranges) further mitigate the relative risk to BSB.

### Clarification on matters specific to Recreational Angling

2. To clarify why spatial closures are not being proposed for Recreational Angling (RA), despite this option being explored by the Authority during Member Working Groups.

In order to gather information about the BSB fishery operating in the 3 x Dorset MCZ's, Members initially proposed that a seasonal closure be considered for 13 Indicative Habitat Areas (IHAs) for all fishing activity (recreational and commercial [pots/traps, nets and lines]) between 1st April-31st July. The aim of this initial proposal was to gain an understanding of the potential impact that the introduction of 'no take zones' could have, if applied across the 13 IHAs, as an initial iteration of possible draft measures.

Using this proposal as a starting point, a Quantification of Impact Exercise (QIE) was undertaken with the stakeholder community to understand more about the BSB fishery at a site level. IFCA's are required by Defra to ensure that any potential impacts are identified and considered in all decision-making processes to ensure that any subsequent management intervention is proportionate to the risk being addressed.

The outcomes of the QIE instigated a three-month review of the BSB work that had been undertaken to date. The catalyst for this review was recognition that, whilst the draft spatial management proposal could satisfy 154 of the MaCAA in isolation, based on the crudest outcomes of the QIE, it was apparent that there could be significant unintended consequences associated with the introduction of such spatial management. As such, the Members resolved to undertake a wider analysis of the fishery to help inform the subsequent decision-making process. This work explored all relevant Material Considerations, including (but not limited to) consideration of gear risk site specific profiling, quantification of existing measures, socio-economic impact and the exploration the BSB designation process (specifically that BSB were not designated under MaCAA 117[4] as rare or threatened due to limited numbers or limited locations where present, rather, they were designated under MaCAA 117[5] to conserve diversity, due to ecological significance...where if not protected the BSB would be affected at population or sub-population level & persistence [where they occur at high densities in contrast to surrounding areas]). Further details of the relevant Material Considerations and their role in the decision-making process will be available in the agenda papers accompanying the Technical Advisory Committee on the 4th of December.

The above-mentioned work was undertaken during a three-month period of 'Review & Refocus'. Following this period, the Members determined to split the BSB Review into two parallel streams of work, each having independent policy objectives and legislative underpinnings - one specific to MaCAA 154 duties and one specific to MaCAA 153 duties, with the Secondary Policy Objective to consider lower risk fishing activities, in accordance with the Policy Drivers and Headline Objective set by the Authority.

It is important to note that specific to RA, as part of the outcomes of the 'Review & Refocus', it was identified that the MOD actively enforce exclusion zones in the largest of the Dorset MCZ's (Purbeck), the footprint of which can be quantified at c.33% of the MCZ during a defined c.32% of the breeding season with additional closures able to be applied to a further c.21% (giving a total coverage of c.54% of the MCZ). The BAE suggests that 57% of known nesting areas in the Purbeck MCZ are found within the MOD exclusion zone. The Authority deem that these spatial closures, applicable to RA (and all other gear types) are actively furthering the COs.

3. To clarify why RA is being considered under the Secondary Policy Objective and not considered applicable to the IFCA duties under Section 154; demonstrating why disturbance resulting from RA is not likely significantly to affect the survival of BSB or their ability to aggregate, nest, or lay, fertilise or guard eggs during breeding – as per the conservation objectives.

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Recreational Angling is already subject to active management across the 3 x MCZ's (and at a District wide level) via the Southern IFCA MCRS Byelaw and via application of MOD exclusion zones in the largest of the Dorset MCZs (covering a quantified 33% of the Purbeck MCZ during 32% of the breeding season with the potential for an increased coverage up to 54%). These mechanisms are and will continue to further the COs of the sites and therefore have direct relevance to the Section 154 duties.

The output of the gear risk assessment identified that for rod & line the applicable pressures were 'removal of target species' and 'removal of non-target species', with a medium rating which, subject to further consideration based on the specifics of this gear type, as per the information provided in Annex 2 of the Conservation Assessment Package, identifies that catch levels for removal are low with additional measures already employed by RA, including increased MCRS. Additionally, recent work in Dorset under the Angling for Sustainability Fisheries Industry Science Partnerships Project (AfS FISP), which used acoustic telemetry to monitor BSB movements in the three Dorset MCZs, provides an early indication that following tagging and release, BSB can return to nesting site areas with some fish then appearing to spend time in a small spatial area potentially indicative of returning to nesting behaviour. This data is currently unpublished and is in the early stages of analysis, therefore a full determination of this behaviour can only be made following the conclusion of all required analysis. However, in considering the measures which already apply in the form of MCRS and spatial closures through external mechanisms, and noting that the designation of BSB is not applicable to a population which is rare or threatened due to limited numbers or locations present, the Authority considers that any additional management to that already in place would be disproportionate to the risk being addressed.

The Authority are committed to ensuring that any additional management of fishing activity which is not classified as high risk must be proportionate and considered holistically via qualification of all relevant material considerations as part of the decision-making process. Recognising that (in combination), the Southern IFCA BTFG 2023 Byelaw, the Southern IFCA MCRS Byelaw and the MOD spatial closures are already satisfying the 154 MaCAA duty, the Authority subsequently determined to explore opportunities for management of all lower risk fishing activities under the legislative umbrella of MaCAA 153 (Primary Policy Objective) and in doing so, committed to explore management solutions best suited to achieve the Secondary Policy Objectives' Policy Drivers & Headline Objectives, as set by the Authority.

It is the Authority's view that any potential disturbance resulting from RA which is likely significantly to affect (a) the survival of BSB, and (b) the ability of BSB to aggregate, nest, or lay, fertilise or guard eggs during breeding, is mitigated via:

- the ongoing application of the Southern IFCA MCRS -this is a statutory measure that has been in place since 2001<sup>1</sup>, with Southern IFCA compliance metrics demonstrating embedded community compliance with this established measure.
- In addition, many of the charter operators working in the MCZs are actively enforcing their own bag limits and across the RA sector, charter operators and individuals are working to an increased MCRS, recognising the importance of the sustainability of the BSB fishery via self-governance mechanisms.
- Further, recent BAE (2025) provided through the AfS FISP, indicates survivability of BSB following catch and release, with BSB returning to nesting site areas and gives a potential indication of the resumption of nesting behaviour based on spending time in a small spatial area following tagging (a more invasive & intensive activity than catch & release)
- Additional spatial measures enforced by the MOD further mitigate the potential impact of RA in 33% of the largest MCZ (Purbeck Coast), during 32% of the breeding season, with the potential for increased spatial coverage of closures up to 54%.

<sup>1</sup> Under the Southern IFCA 'Minimum Fish Sizes' byelaw, subsequently revoked and replaced in 2021 by the 'Minimum Conservation Reference Size Byelaw'

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The Authority deem that these measures in combination, which are directly applicable to RAs, are (1) furthering the COs; specifically, that the mitigations reduce the potential for disturbance caused by RA, and therefore RA is not '...likely significantly\*...' to affect (a) or (b) as per above [\*to probably happen, by a large amount], and (2) accordingly are satisfied that there is no significant risk that RA will hinder the achievement of the COs.

Whilst Policy Objective 2 (153 duties) remains legislatively separate to Policy Objective 1 (154 duties) and therefore does not require formal consideration by Natural England (NE), it is of importance for NE to recognise that the application of management solutions relevant to Policy Objective 2 will contribute to the ongoing furthering of COs in a way which considers the wider complexities of the BSB fishery in Dorset, allowing understandings of the fishery to advance in collaboration with stakeholders, which will facilitate achievement of shared endeavours which are relevant to NE, Southern IFCA and the wider community. Affording BSB with proportionate and appropriate protections in an adaptive manner allows Southern IFCA, as a regulator, to robustly respond to BAE in a timely way to ensure the future sustainability of this fishery in Dorset. Southern IFCA's role as a regulator is not to inhibit fishing activity disproportionately and therefore must consider risk and proportion in its decision-making processes.

Through pragmatic application of Southern IFCA's legal functions, shared objectives (namely the overall sustainability of BSB) can be achieved via parallel delivery of 154 and 153 duties, which will facilitate co-management with a community who are committed to the ongoing protection of the BSB. The dual approach presented by Southern IFCA allows the management focus for lower risk fishing activities to be iterative and adaptive, as supported by improved understandings, and thus providing a more holistic approach to conservation and fisheries management which, in combination will achieve a furthering of conservation objectives, whilst remaining true to the wider functions of the IFCA. This provides a platform upon which Southern IFCA can continue to work collegially with NE and the Dorset community to ensure that shared objectives are achieved in the long term at a community level for the benefit of both conservation and fisheries.

It is observed that the Drivers and Headline Objectives underpinning Policy Objective 2 align with NE's 2025 Strategy: Recovering Nature for Growth, Health and Security. It is understood that the driver for this Strategy recognises, in part, that previous NE management directives for protection and restoration alone cannot achieve shared endeavours, rather there is a need to consider economic growth, health (to include wellbeing via access to blue space) and food security (fisheries) alongside the recovery of nature.

### [Further information on data collection and its role in adaptive management](#)

4. To expand on how data collected via the co-developed principles will be used for the purposes of adaptive management; for example, whether it will be used to identify increased/emerging risks and trigger a review of the current management approach.

BSB populations and associated fisheries are considered data poor, the data collection programme, as one of the CoD Principles, will provide data at the spatial scale of the three MCZs, supporting wider external research on BSB, and will provide an evidence base to help inform ongoing management of relevant fisheries. The data collection programme will also provide data to the Seabreams FMP during the implementation phase helping to support local and national management through an aligned, evidence-based approach. Data will be sought across commercial fisheries (net, rod & line), recreational fisheries (rod & line) and charter vessel fisheries (rod & line) via multiple mechanisms to facilitate maximum participation.

An Annual Review of the CoD Principles will follow the conclusion of the recognised breeding season and will consider community feedback on the application of the CoD Principles & overall health of the BSB fisheries, analysis of data collected during the season, additional data collection (running year-round), IFCA compliance & enforcement metrics, data from external sources (other relevant

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authorities), BSB FMP outcomes (goals, actions, data gaps) and emerging evidence on BSB populations or fisheries (for example published outputs from the AFS FISP).

Following Annual Review, any changes proposed to the CoD Principles will be considered with the community prior to consideration by the Authority, with any changes implemented prior to the subsequent season. Following Annual Review, if singular or multiple CoD Principles are deemed not to be achieving the Policy Objectives, then consideration may be given to the development of fisheries relevant triggers in line with recognised practice. Southern IFCA recognise that this fishery is data poor, as such, an adaptive management approach, as facilitated under the Secondary Policy Objective, allows Southern IFCA to robustly respond to BAE in a timely way to ensure the future sustainability of this fishery in Dorset.

Southern IFCA welcome this opportunity to provide Natural England with more in-depth rationale to support the information provided in the Assessment Package, and would like to take this opportunity to draw together the following conclusions:

The Authority conclude that appropriate mitigative measures are already in place via a combination of spatial and technical statutory mechanisms, which are collectively furthering the Conservation Objectives relevant to BSB across three Dorset MCZs. This is primarily being achieved via the elimination of BTFG activity across the entirety of Poole Rocks MCZ (whole site) and Southbourne Rough MCZ (whole site) and via a BTFG spatial closure across 93%<sup>2</sup> of the Purbeck MCZ, thus removing the highest risk fishing activity almost in its entirety across the three Dorset MCZs. Additionally, the furthering of the COs is being achieved via enforcement of a MCRS for BSB at a District wide level, applicable to commercial and recreational users, which is also applicable to the wider supply chain. Furthermore, spatial restrictions via an exclusion zone in the Purbeck MCZ, which equates to quantifiable closures for c.32% of the time (during the relevant season), across c.33% of the MCZ (which can be extended to c.54%), as enforced by the Ministry of Defence (MOD), are further enhancing protections to BSB in the Purbeck MCZ across the entirety of gear types (commercial and recreational) via closures applicable to all users.

Collectively, the Southern IFCA statutory measures (as well as those enforced by the MOD) are already providing protections to BSB beyond the 3 x MCZ's collective footprint, at a temporal scale beyond that of the breeding season. As such, these statutory measures are providing protections to BSB nesting sites and populations at a level which exceeds the scope of the Conservation Objectives. In combination, these measures are furthering the Conservation Objectives for BSB across the Purbeck Coast MCZ, Poole Rocks MCZ and Southbourne Rough MCZ.

Please note that we will be incorporating the above requested information into the Assessment Package as required in due course, for completeness. In the meantime, we ask that Natural England consider this letter alongside the Southern IFCA Black Seabream Conservation Assessment Package (sent on the 13th of October 2025) in order to avoid any unnecessary delay in provision of Natural England's final conclusions.

Kind Regards,

A handwritten signature in black ink, appearing to read "Pia Bateman".

Pia Bateman

Chief Executive Officer, Southern Inshore Fisheries and Conservation Authority

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<sup>2</sup> The remainder of the Purbeck Coast MCZ is subject to feature data which has been deemed unreliable in terms of location and/or extent by Natural England and is therefore not suitable as a basis for making management determinations. The feature data does not relate directly to BSB and it has been confirmed by NE through the Part A Assessment process for the BTFG Review Phase 1 that the area of the MCZ which remains open to BSB poses no risk to BSB as a designated feature.