

Afternoon Mr Butler,

As per phone call this morning. I want to put in writing some of the points that were raised.

We have grave concerns about "The Shellfish Gathering (Conservation) Regulations (Northern Ireland)" the reasons being:-

1. Economic impact- You cannot close an industry for a third of the year within causing severe damage to that industry via market prices ETC. The answer you received indicated that because periwinkles are exported there would be no negative impact but this is clearly nonsense. There will be the lose of markets as we cannot supply our customers meaning that they will go elsewhere to find the product and come May when we are trying to get our customers back there is no guarantee as they may wish to stay with their new suppliers, so this may have a financial impact on our business all year round. The four month closure will most certainly have a severe impact on us.

You could split the year into 3 parts. The first four months (January- April) are lucrative for pickers as the Spring tides and cold weather bring in the large (jumbo) winkles and these command a premium price. The second four months (May-August) the winkles are sparse as the beach takes on a weed that covers the area and many pickers don't bother picking. The final four months (September-December) are good as prices begin to pick up and reach a peak for the Christmas/New year period.

We would be sceptical of the 400-ton figure that you have been quoted, but we would need more time to analyze that figure.

2. Need for regulations - We do not see the need for regulations as nowhere else in the United Kingdom and Republic of Ireland has any, with the exception of one or two small areas in England, like marine nature reserves. Indeed in recent conversations I've had with processors in Scotland and ROI they say there is no way they would have regulations. As you said Chair, they are an abundant species and the market regulates itself in that it will not accept small Periwinkles.
3. AFBI Survey- This survey was carried out in Strangford Lough and how can we be sure that it is relative to the whole of Northern Ireland, which the ban covers. If there were to be a ban it would make more sense to have it from May until August when it would have least impact financially to both pickers and business but I would emphasize the need for no ban. There are other shellfish species which spawn at different times in different areas, so how can we be sure the Periwinkle

spawning in Strangford Lough is at the same time as the outer Lough. The science is incomplete.

4. Length of notice- We received notice on Monday afternoon (26th) saying that the ban would come into effect on the 6th February giving 11 days notice. This is absolutely ridiculous a business cannot operate like that, we have already received orders for the next 6 months. This just shows a total lack of knowledge as to how business works.

Hopefully you can do something to stop this legislation going through and perhaps it should wait until the FMP comes to fruition in 2027/2028.

If you require any more information please don't hesitate to contact me.

Thanks

Paul Leeman